



ROUNDTABLE ON SUSTAINABLE PALM OIL (RSPO)

GP01

RSPO Principles & Criteria Certification Description of the Certification Process

Document Reference: [GP01 RSPO P&C MY Eng v1.1]

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Note:

- Bureau Veritas Certification (Malaysia) Sdn Bhd is accredited for RSPO Principles & Criteria certification systems and authorized to make certification decision for the contract company.
- This document is attached and applicable for each RSPO P&C contract of Bureau Veritas Certification (Malaysia) Sdn Bhd and its local offices contracted under Service Level Agreement (SLA).
- The signature and the chop of the company on the contract are worth acceptance of the terms of General Certification Conditions (SF05), Generic Terms and Conditions for Certification Services (SF05) and of the General RSPO Certification Process (GP01 V1.1).

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1. General presentation of the RSPO Certification system

1.1. Presentation of the RSPO

The Roundtable on Sustainable Palm Oil (RSPO) is a not-for-profit, international membership organisation that unites stakeholders from the different sectors of the palm oil industry: oil palm producers, processors and traders, consumer goods manufacturers, retailers, banks/investors, and environmental and social non-governmental organisations (NGOs), to develop and implement global standards for sustainable palm oil production.

The RSPO is a voluntary certification scheme established in 2004. The RSPO consists of a Secretariat and RSPO members. The RSPO standards are revised every five years. There are two types of certification: Principles and Criteria (P&C) and Supply Chain Certification (SCC). Further information on RSPO can be obtained through www.rspo.org.

1.2. RSPO P&C System Requirements

RSPO certification system requirements are defined by the RSPO Principles and Criteria for the Production of Sustainable Palm Oil and RSPO Certifications Systems for Principles & Criteria.

When Bureau Veritas Certification (BVC) issues RSPO P&C certificate to a company, it provides a guarantee that the company has demonstrated conformity with all the applicable RSPO requirements at the time of Bureau Veritas' verification.

BVC's overall performance; review of independence; used policies; certification decision process, implementation of policies and dispute resolution are available upon request.

2. Certification Proposition

2.1. Certification Process Description

This document presents BVC procedures concerning RSPO Principles & Criteria certification. These procedures are developed according to RSPO Certifications Systems for Principles & Criteria.

The RSPO P&C apply to all production level companies, i.e. all mills, who do not fall under the definition of independent mill as outlined in the RSPO SCC standard; and to all growers, who do not meet the definition of Independent Smallholder or the applicability requirements as outlined in the RSPO Smallholder Standard (under development as of September 2018 with finalisation expected in 2019) and therefore cannot apply the RSPO Smallholder Standard. These are referred to as the unit of certification throughout this document.

Several scope of certification offered under RSPO Principles & Criteria, for example:

- a. Palm Oil Mill and its Supply Bases
- b. Independent Smallholders (ISH)
- c. Out-growers
- d. Group Certification (e.g. several out-growers coming for RSPO P&C certification together under one ICS)

2.2. Useful definition

a. Standard:

Bureau Veritas Certification is performing certification audit on clients premises based on RSPO Principles and Criteria for the Production of Sustainable Palm Oil standard; and it's applicable procedures established by RSPO Secretariat. Access to the latest version of RSPO standard can be obtain through <https://rspo.org/resources>.

The standard defines the requirements that the applicant to certification shall meet and serves as evaluation basis during audits.

b. Applicant:

Bureau Veritas Certification considers an applicant as any legal entity applying for a certification and linked contractually with Bureau Veritas Certification.

c. Unit of Certification:

Bureau Veritas Certification considers Unit of Certification as all production level companies, i.e. all mills, who do not fall under the definition of independent mill as outlined in the RSPO SCC standard; and to all growers, who do not meet the definition of Independent Smallholder or the applicability requirements as outlined in the RSPO Smallholder Standard (under development as of September 2018 with finalisation expected in 2019) and therefore cannot apply the RSPO Smallholder Standard.

d. Site(s):

Bureau Veritas Certification consider "site" as any location of a legal entity; and/or a majority holding in and/or management control of more than one autonomous company growing oil palm belongs to the applicants.

e. Group Certification:

A certification option for a group of sites that have a legal or contractual link with a defined Central Office, who acts as ICS.

f. Outsourcing/subcontracting:

Bureau Veritas considers as outsourcing or subcontracting an organization in which any part of the operation/services is managed by a third party company.

g. Stakeholders:

Bureau Veritas certification considers stakeholders as an individual or group with a legitimate and/or demonstrable interest in, or who is directly affected by, the activities of an organisation and the consequences of those activities.

3. Certification Application

Any company interested in RSPO P&C certification shall receive PC01 (Application Form), the present document (GP01) and its relevant standards (where applicable); such as:

- a. RSPO Principles and Criteria for the Production of Sustainable Palm Oil standard
- b. RSPO Independent Smallholders Standard for the Production of Sustainable Palm Oil
- c. RSPO Rules on Market Communications and Claims

The whole RSPO standards, policies, procedures and guidance are available in RSPO web site (<https://rspo.org/resources>).

3.1. Preliminary Check of the Application Form and Certification Proposal

On return of the PC01 Application Form duly filled in, Bureau Veritas Certification will perform application and contract review to allow accurate certification offer. Nevertheless the PC01 also allows Bureau Veritas Certification to ensure that the entity is able to enter the certification process and to maintain it afterwards.

Together with the offer, the general and specific terms of sale are provided to the applicants. Any application from unit of certification that are already covered by a valid or suspended RSPO P&C certification (except for transfer) will be rejected. Any other reason for declining the application from the review process, will be explained to the applicant via written communication.

It is essential for Bureau Veritas Certification to ensure and confirms that the applicants is a registered RSPO Members and in RSPO IT Platform; as well as completed all preliminary procedures set by RSPO (e.g. Remediation and Compensation Procedure; New Planting Procedure, High Conservation Value Assessment, etc.) at the time of certification proposal preparation.

3.2. Certification Contract

When the applicant understand and accepts Bureau Veritas Certification's certification proposal, the returned signed document: the certification proposal then becomes an official certification contract between the applicant and Bureau Veritas Certification.

For initial/re-certification audit application, Bureau Veritas Certification shall at minimum notify RSPO Secretariat to perform Public Announcement in the RSPO websites (<https://rspo.org/certification/public-announcement>) at latest thirty (30) calendar days before the Initial Audit.

3.3. Audit Preparation

Bureau Veritas Certification and the applicant for certification agree on the audit team's timetable and composition with a view to prepare the pre-audit or the initial audit.

The applicant can ask for a revision of the audit team composition to avoid any risks of conflict of interests between the unit of certification and one or several audit team members. The final selection of the audit team composition is nevertheless made by Bureau Veritas Certification.

The audit preparation is finalized and presented to the applicant. The documents that will have to be examined by the auditors before the audit are then requested from the applicant.

4. Auditors of Bureau Veritas Certification (RSPO Principles & Criteria)

4.1. Auditor's Qualification

Bureau Veritas Certification only calls upon RSPO P&C experts, in order to give priority to the following points:

- a. Independence: the auditors shall not have been employed, nor be a consultant for the last 3 years.
- b. Mastering of oil palm plantation/forest management techniques and processes
- c. Knowledge of the industry.

Besides, to be described as Bureau Veritas Certification auditors, these specialists shall:

- a. Prove a technical competence and a professional experience in the forestry/oil palm plantation field;
- b. Have successfully completed a specific training for auditing and the RSPO P&C certification system standard;
- c. Sign a non-disclosure agreement to protect the applicant's details;
- d. Have validated his/her competency by having participated in at least three audits.

Finally, Bureau Veritas Certification specialized auditors are appointed for certification audits realization according to the three following criteria:

- a. Competence in the oil palm plantation and familiarity on issue/areas concerned by the unit of certification
- b. Nearness to the location of the oil palm plantation
- c. Availability on the certification dates wished by the applicant

Bureau Veritas Certification auditors favour a pragmatic and practical approach. Prior to any other thing, they have been provided with calibration training related to RSPO P&C standards requirements and its certification procedures to master its activities and to improve them.

4.2. Audit Team Composition

An audit team is formed of at least one Bureau Veritas Certification Lead Auditor, most of the time assisted by other auditors or technical/local expert. If necessary, Bureau Veritas Certification calls on technical/local experts who come with a specific competence in a field or a particular region. Thus the qualifications we should find within the audit team (among others specified in RSPO Certification System Documents) are:

- a. A qualified Lead Auditor (mandatory);
- b. Someone fluent in the local language (or an interpreter) when required. This person cannot be related to the applicant in any way;

- c. Someone who has experience or the required qualifications concerning social problems in the region;
- d. Someone who has experience or the required qualifications concerning economic problems in the region;
- e. Someone who has experience or the required qualifications concerning environmental and oil palm plantation management in the region.

4.3. Observer's participation to audits

Bureau Veritas Certification can be led to associate observers to its Certification or monitoring audits.

An observer is a person who accompanies the assessment or audit team but does not assess or audit. Observers are recognized as interested parties, but shall respect the code of conduct outlined in this document.

NOTE 1: An observer is not a part of the audit team and shall not influence or interfere with the audit.

NOTE 2: An observer can be from a regulator or other interested party who witnesses the audit.

These observers can be:

- a. Bureau Veritas Certification in-house auditors (within the scope of in-house audit activities of Bureau Veritas Certification),
- b. Bureau Veritas Certification International in-house auditors (in-house audit of Bureau Veritas Certification Local Office by Bureau Veritas Certification International network),
- c. Bureau Veritas Certification auditors undergoing training,
- d. Observers having signed Confidentiality and Non-Conflict of Interest agreement,
- e. ASI Assessor (Accreditation Services International - Accreditation Organization for RSPO) (at the time of a Bureau Veritas Certification audit within the scope of accreditation programmes).
- f. Scheme Owner (RSPO Secretariat)

The applicant has to accept the presence of an accreditation body representative during Bureau Veritas Certification audits. In other cases, the presence of observer will be submitted and notified for Applicant's agreement.

The applicant shall submit substantiate justification (conflict of interest, track record of breaking confidentiality agreements, track record of audit misconduct, and evidence of an intended disruption of the audit) in case of rejection of observer's application, otherwise the refusal will not be accepted.

5. Pre-Audit (Optional)

5.1. Pre-Audit interest and realization

The pre-audit stage consists in evaluation on how oil palm plantation management operations satisfy RSPO Principles & Criteria standard requirements and thus if the applicant can undergo a complete assessment (carried out during the initial audit).

The pre-audit allows to analyse the unit of certification in particular, to check that the purposes of the procedure are understood by the applicant (questions provoked by the standard, process details, label use, etc.) and to define issues that the applicant will need to implement necessary updating actions before the initial audit.

That stage is not systematically compulsory in the certification process, nevertheless it is recommended when oil palm plantation management operations are complex or when the surface area to be assessed is important (e.g. controversial issue, history of certification revoked, sensitive areas, etc.).

Bureau Veritas Certification may request the applicant to be previously audited (pre-audit to be performed) in any risky areas, in order to identify whether the applicant to RSPO P&C certification can reach the level of performance demanding by RSPO P&C standard and the national interpretation, in such context. Such risky areas can be identified with the following criteria:

- Presence of protected/sensitive areas within proximity/close to the unit of certification;
- High level of corruption;
- Known stakeholder's issues about the company's activities.

And in any case, in order to limit failure and extra cost risks, pre-audit allows the applicant to check that the organization set up for certification does not present any major dysfunctions and that he does not become wrongly involved in the certification procedure. It is mainly about a documentary survey, however, according to circumstances (size of the oil palm plantation, complexity of plantation management), a visit in the unit of certification may be organized as well as consulting the stakeholders.

In the case of group or multiple site evaluations, there will be an analysis and description of the units of certification and the procedure of sampling; an initial analysis of the applicants management systems and an explicit review of conformity with the requirements for group entities.

A pre-audit report is given to the applicant which specifies Areas of Concerns (AoC) to be implemented before the initial audit as well as the time limits to carry out these actions, in agreement with the applicant.

Besides, the pre-audit stage is highly recommended for a smooth course of the stakeholders' consultation: even before pre-audit, the applicant entity and Bureau Veritas Certification shall proceed with the stakeholders' first identification, in order to organize a consultation which will take place during the pre-audit.

Afterwards, during pre-audit, the auditor will try to make the stakeholders' list as exhaustive as possible for Bureau Veritas Certification to be able then to start the consultation.

Note: It is strongly recommended that the applicant should have identified and got into contact with the stakeholders even before the beginning of the certification process. Applicants not having carried out that work are invited to do so.

5.2. Setting Up Areas of Concerns

On the pre-audit report basis, the applicant for certification sets up, within the due time, upgrade actions in order to find a solution to critical points identified during pre-audit.

At the same time, Bureau Veritas Certification gets in contact with the identified stakeholders, at least thirty (30) days before the initial audit, presents to them the certification procedure objectives, collects potential observations concerning the management practised by the unit of certification, and, in certain cases, submits the RSPO P&C standard to them for comments (during a first use so that the latter is perfectly appropriate to the concerned site characteristics).

Then a team of auditors is missioned by Bureau Veritas Certification to prepare the initial audit. Bureau Veritas Certification shall receive notice by mail from the applicant that the corrective actions on the AoC's raised were carried out so that Bureau Veritas Certification may set the initial audit dates.

6. Initial/Surveillance/Recertification audit

6.1. Audit Agenda

Sufficiently early before the audit, Bureau Veritas Certification provides the applicant a provisional audit agenda which specifies the applicant's organization elements which will be subjected to assessment as well as a timetable of the interventions.

That agenda can be reconsidered afterwards, according to its coherence with the organization of activities and availability of the people that the auditors wish to meet, so as to perturb as little as possible the running of the company. For group or multiple sites, the sampling will be analysed in order to get the best overall point of view of the applicant's situation.

If the documentary review or the preliminary audit showed numerous differences that could not be corrected before the initial audit and risking to compromise the certification process, the applicant may ask Bureau Veritas Certification within reasonable time previous to the audit for the audit to be postponed so as to put itself in conformity.

6.2. Audit Realization

The audit stage consists in checking that the unit of certification respects all the requirements recorded in the RSPO Principles & Criteria standard so as to grant or not the certificate.

6.2.1. Opening meeting

The audit starts by a meeting during which the Lead Auditor confirms the certification scope, presents the team and confirms the audit plan and logistic according to the latest changes that the applicant entity may perhaps wish to bring.

The presence of the Company's managers and heads of departments is necessary during that meeting so that they can clearly perceive the way in which the audit will take place and thus be able to inform their staff.

6.2.2. Audit Commissioning

The audit team work is at first done on documents, then from field inspections and interviews of employees, outside contributors, and stakeholders' representatives. The initial audit principal missions are as follows:

- Analysis of unit of certification;
- Evaluation of management system(s);
- Selection and Evaluation of unit of certification

In order to do so, the audit team will proceed in different ways:

- Introduce, among the controlled requirements, the region's specific elements (such as locally endangered species) and, if necessary, take into account local and regional uses and rules;
- Meet the identified stakeholders' representatives;
- Visit the applicant's offices/field for which assessment of the operational system for planning, plantation management and surveillance is set up as described in a management scheme;
- It also collects detailed and precise information on sites, rare threatened and endangered species and volumes as well as on the good agriculture practices, social and environmental as well as safety and health management;
- Define the standard and discuss the encountered problems with the unit of certification managers and the staff concerned.

6.2.3. Recap Meeting

At the end of each audit day (or after each main stage of the audit), recap meetings are organized so as to sum up the audit progress and synthesize the first results. The differences encountered during the day (or the stage) are analyzed thus allowing the unit of certification to start thinking about the corresponding corrective actions.

6.2.4. Closing Meeting

The Lead Auditor organizes a closing meeting at the end of the audit. It gathers, as far as possible, the same people as those who were present at the opening meeting. That meeting enables to present the audit results and its conclusions, as well as handing in the nonconformity reports and to have the audit conclusions signed.

Despite the audit will present the Non-Conformities (NC) during the closing meeting, the final wording and grading of all NC will be submitted by Bureau Veritas Certification offices together with the finalized audit report resulting from the certification decision.

During the closing meeting, the lead auditor gives to the applicant a copy of the nonconformity reports for sign off and acknowledgement. At that stage, the initial audit results only expose the noted situation and facts, they do not allow a certificate allocation decision.

Bureau Veritas Certification is not obliged to grant or maintain certification, if activities of the client conflict with the obligations of Bureau Veritas Certification as specified in its accreditation contract with ASI, or which, in the sole opinion of Bureau Veritas Certification, reflect badly on the good name of Bureau Veritas Certification

The audit team produces a temporary initial audit report and submits it to the Bureau Veritas Certification technical manager concerned. The audit report is reviewed by Bureau Veritas Certification.

6.3. Reporting

BVC audit team will furnish the audit report pack with timeline set by the RSPO Certification System for P&C and RISS (Nov 2020).

Content of the audit report pack, *inter-alia*:

- Audit agenda
- Public summary report
- Audit checklist
- Closing meeting report
- RSPO metric template

6.4. Technical Review Process

All reports shall be submitted to the Technical Reviewer for technical review (taking into account the substantive issues) of correctness of the post-audit documentation provided by the lead auditor. Technical Review form shall be filled in to demonstrate that the technical review process has taken into place and that all relevant RSPO requirements have been complied with during the process.

For Initial and Recertification audit, the report shall be submitted for Peer Review process. Any clarification required by the Peer Review shall be responded by the Technical Reviewer and lead auditor.

Following technical review of the audit report and relevant associated information, including completion of the Peer Review process, the Technical Reviewer shall make a certification recommendation to the Certification Manager/Certification Director who will make the final certification decision.

Upon positive recommendation and approval, the audit report together with the RSPO metric template and certificate will be submitted to RSPO Secretariat for review and PalmTrace license request.

6.5. Peer Review Process

As required in RSPO Certification System, Bureau Veritas Certification will submit the initial audit report for comments on the unit of certification as well as to pairs, who carry out an independent review in full confidentiality and impartiality.

There is minimum one peer reviewer who is an independent expert, familiar with the problems linked to the oil palm plantation management, palm oil mill operations and RSPO P&C certification system requirements.

The choice of peer reviewer is, like the choice of the auditors, carried out by Bureau Veritas Certification then, if requested, submitted to the applicant in case changes/updates is required.

7. Non-Conformities

7.1. Non-conformities definition

The dysfunctions met during the audit are commented by the Lead Auditor with the applicant's representative, who can then bring complementary elements allowing to evaluate them in a more global context. If these elements are deemed insufficient by the audit team, the dysfunctions are then formalized in nonconformity reports the originals of which are left to the applicant, signed by their representative.

The nonconformities thus formalized always meet the 3 following criteria:

- Be objective and motivated by failure to meet a standard requirement or a disposition planned by the applicant.
- Be founded on proof and in no case on presumptions.
- Be understood and accepted by the Applicant.

According to their importance, nonconformities appear as observations, minor corrective actions requests or major corrective actions requests.

7.2. Non-conformities status

There are three corrective action levels:

- **Observations:** remarks concerning either dysfunctions or potential improvements detected by the auditors, but for an element which, however, meets the standard requirements, or even an element which is not dealt with by the standard. The entity can be certified;
- **Non Critical Non-Conformities (Minor NC):** the entity can be certified but it must put itself in conformity with the requirements in question within the year following the initial audit;
- **Critical Non-Conformities (Major NC):** the entity cannot be certified as long as it does not meet the requirements in question and a complementary audit specific to major NC will take place before any certification decision.
- In the scope of surveillance audits, in a RSPO P&C certification process (once the entity is certified);
 - In case of recurring Critical NC on the same indicator in successive surveillance audit, the certificate will be immediately suspended.
 - In case of recurring Non-Critical NC on the same indicator in successive surveillance audit, the NC will be upgraded to Critical NC.
 - In case of 5 or more NC within one Principles, the certificate will be immediately suspended.
 - In RSPO P&C certification, a Critical NC can never be downgraded to a Non-Critical NC;

Any non-conformity against RSPO Certification System for Principles & Criteria will be treated as Critical Non-conformity. For all non-conformity, unit of certification will be requested to submit proposal on corrective action within a maximum period of two (2) weeks from the date of closing meeting.

7.3. Timelines for NC closure

The Applicant can start corrective actions to solve the nonconformities as soon as the nonconformity reports have been signed.

7.3.1. Minor Non-Conformities

Non-Critical NC shall be corrected as soon as possible, the latest by during the next surveillance audit or within one (1) year.

7.3.2. Major Non-Conformities

Critical NC shall be corrected within a maximum period of ninety (90) days. In case of failure to address the NC within 90 days, the certificate will be suspended. In case the unit of certification fail to address the NC within 6 months after closing meeting, the certificate will be withdrawn.

The nonconformity reports filled in by the unit of certification are returned to the Lead Auditor. Bureau Veritas Certification will inform the client if the closure of the NC involve an additional audit on site to assess the corrective and preventive actions carried out by the client.

7.4. Follow up / Special audit

Subject to the complexity and criticality of the audit findings, BVC's audit team may conduct a follow up or a special audit at client's site or via remote audit, to ensure that all the actions taken to address the Non-Conformities by the applicants have being implemented adequately.

In other points, should BVC received any complaints or issues concerning the area being certified, a special audit may be conducted.

The confirmation and arrangement of the follow up audit or special audit, to be liaise with the management representative.

8. Certification

8.1. Certification Decision

On the basis of the initial audit report finalised, the comments of the applicant for certification as well as the peer review, the certification decision is made by the Bureau Veritas accredited entity.

Bureau Veritas Certification communicates certification positive decisions to the client maximum twelve (12) months after the main evaluation. In case of negative certification decision, Bureau Veritas Certification provides the reasons for this decision to the client.

Prior to making the certification decision, the Certification Decision maker can ask for a complementary audit in order to clarify some parts. He also may raise non-conformity or upgrade a minor non-conformity to a major nonconformity if the non-conformity represent either alone or in combination with further nonconformities, it results in, or is likely to result in a fundamental failure:

- To achieve the objectives of the relevant RSPO P&C Criterion, or
- In a significant part of the applied management system.

8.2. Certificate Granting

When the certification decision is favourable and the applicant accepts the observations and possible non-conformities, the certification is granted for maximum five years. A certificate number is given to the applicant who becomes a certified organization.

Upon signing of RSPO License agreement, the RSPO certified entity can use the RSPO trademark while respecting the conditions of use described in the RSPO Rules on Market Communication and Claims (Jan 2019).

Bureau Veritas Certification prepares a public summary (general and non-confidential data) mentioning the certification decision. The public report will be considered as accepted by the applicant and will be published in both BVC and RSPO website.

9. List of documents to be provided for application

So as to inform the audit team before the first assessment and, in certain cases, to be able to establish a personalized services offer to the unit of certification, it is requested to transmit to Bureau Veritas Certification, at the time of the official application, the following elements:

9.1. In case of Mill and Supply Bases Certification/Out growers (>50ha)

- Large scale map showing location of the unit of certification;
- Age profile of oil palm within the unit of certification, GPS coordinate;
- RSPO Membership documentation;
- Where applicable: Time-bound Plan; New Planting Procedure Verification Report, Remediation and Compensation Procedure process, High Conservation Value Report;
- Legal documentation, business permits;
- List of stakeholders;
- Document dealing with the particular management of environmental and social aspects, for example: identification and technical itinerary of remarkable sites, sensitive zones, protected species; environmental and social impact surveys, chemical agents use; stakeholders' consultation... It can be the management document or an appendix if these elements are not dealt with in the management document;

9.2. In case of Independent Smallholder (ISH)

- Large scale map showing location of the unit of certification and its group members;
- Age profile of oil palm within the unit of certification, GPS coordinate;
- RSPO Membership documentation;
- Where applicable: Remediation and Compensation Procedure process, Land Use Change Analysis Report;
- Legal documentation of the group manager, business permits;

- List of stakeholders, List of group members;

It is in that case preferable to contact Bureau Veritas Certification.

9.3. List of documents to be prepared for the first audit

After having sent the above mentioned documents and so as to proceed with the first audit (pre-audit or initial audit), certain documents will have to be prepared and put at the audit team's disposals:

- Stakeholders' consultation elements;
- List of stakeholder;
- information relating to environmental, social and landscape constraints;
- elements taking into account certification requirements with regard to the plantation, contractors or workers;
- any information concerning the rights and uses (mandates, leases, uses, legal constraints...);

9.4. List of information and documents to be made public

Within the scope of certification, certain elements must be made public. That requirement applies as soon as the unit of certification receives a certificate:

- name and address of the unit of certification;
- certificate number;
- last name and first name of the person to be contacted within the scope of the certification;
- Information related to the unit of certification included in the scope of the certification (name, localisation, area, etc.);
- RSPO P&C certification standard and documents defined in the RSPO Certification System documents.

Bureau Veritas Certification is responsible, through legally enforceable commitments, for the management of all information obtained or created during the performance of certification activities.

Information is considered proprietary and shall be regarded as confidential, except for information that the client makes or is required to make publicly available (see the list above) and that RSPO and ASI are entitled to access, or when agreed between the CB and the client (e.g. for the purpose of responding to complaints).

10. Management of the disputes linked to the certificate

Bureau Veritas Certification developed within the scope of the RSPO P&C certification system, a process based in great part on consultation and concertation. The latter operates through the unit of certification's information and consultation, at the different stages of the certification process, but also through the consultation of all the stakeholders involved in the management unit. These consultation and voluntary participation general principles enable to avoid any dispute concerning certification benefits.

Nevertheless, if a conflict appears within the scope of a certification decision, Bureau Veritas Certification has set up a complaints and appeals management procedure, enabling to deal with the latter with maximum independence and according to the following particularities:

- Everything is implemented by Bureau Veritas Certification to solve the conflict in an amicable manner.
- When the conflict concerns a certification decision, the certification decision maker intervenes in the resolution;
- When the conflict concerns the use of the certification mark or the standard requirements, the RSPO is regarded as the final judge.

11. Use of the RSPO trademark

11.1. Use of the RSPO trademark

The certified entity is required to sign License Agreement with RSPO in order to use of the RSPO trademark. It must respect the RSPO label/trademark conditions of use, for its product use as well as for its promotional use.

These conditions of use are to be found RSPO Rules on Market Communication and Claims document.

11.2. Use of Bureau Veritas Certification mark

The company certified by Bureau Veritas Certification can use the Bureau Veritas Certification mark, associated to the RSPO mark and respecting every RSPO trademark use requirements (see RSPO Rules on Market Communication and Claims).

The size of the Bureau Veritas Certification logo shall not be bigger than the RSPO logo and if it consists on product marking, the RSPO label must be sufficiently visible to avoid any confusion (data processing provided on demand).

This logo cannot be used alone and can only be used in association with the RSPO trademark.

12. Certificate Maintenance

12.1. Annual Surveillance Audits

Surveillance audits will take place at least annually (once per calendar year) but may be more frequent depending on:

- The complexity and evolution of the certificate holder management system conformity;
- The scale of operation;
- The intensity of resource management
- The ecological or social sensitivity of the resource base to management intervention;
- The experience and track record of the operations involved;
- The number and nature of any complaints submitted by stakeholders;
- The deadline of non-conformities resolution.

NOTE: RSPO and ASI reserve the right to request higher surveillance frequencies from certification bodies for certain geographical areas or certification services that are deemed "challenging" or are linked to "high" or "specified risk" as the result of an internal risk assessment.

Surveillance audits enable to monitor:

- The management continuation as assessed during the initial audit;
- The implementation of minor corrective actions and eventual recommendations;
- The correct use of the RSPO trademark by the certified organization

After each surveillance audit, the public summary will be updated with the new observation and findings made during the audit. This summary will be published in BVC and RSPO websites.

During the valid period of the certificate (maximum 5 years), if Bureau Veritas Certification notes significant nonconformities leading to minor or major ones:

- for Non Critical NCs the company is given a period of time of 12 month to implement the necessary corrective actions to close the non-conformity. After this period, if one minor NC is not closed, either by lack of proof or lack of audit, it is automatically upgraded to Major NC, and subject to closure in the next 3 months.
- for Critical NCs:
 - in a RSPO P&C certification system, if Critical NCs are issued; the entity is allowed a length of time given by the auditors, relatively short (three months maximum), to meet the relevant requirements. At the end of that period of time, a complementary audit is carried out (documentary and/or field). According to the assessment of the given answers, the certificate is maintained or suspended over a period of time sufficient for the company to put itself in compliance.

A Critical NC can never be downgraded to Non-Critical NC in RSPO P&C certification. If 5 or more Critical NCs are issued within one Principles; the certificate will be immediately suspended. If 5 or more Critical NCs are issued, the certificate is immediately suspended.

Recurrence of Critical NC on same indicator in successive surveillance audit will lead to immediate suspension of certificate.

- When corrective action is implemented in order to close the nonconformities, a complementary audit is carried out (documentary and/or field), according to the assessment of the given answers, the certificate is re-issued or maintained suspended until the company is able to implement the necessary actions.

Each year, the certified organization provides Bureau Veritas Certification with the list of the sold certified products from the "unit of certification".

12.2. Certificate scope extension

Certification scope extension can be requested to widen the field of application of a certificate:

- a unit of certification manager wishing to include new supply bases to the field of application of his certificate, or,
- a manufacturer or a dealer wishing to include new units to the field of application of his certificate.

The certified organization might be subjected to an extension audit depending on the importance and/or the intensity of the new activities or areas to be included in the scope of certificate. This audit will be carried out on all new elements to be included in the scope of the certificate to monitor the compliance with the requirements defined in the applicable RSPO standards (comparable to the initial audit).

In any case the extension is reported to the technical reviewer and if an audit was carried out, the audit report is submitted to the Certification decision maker for analysis and it decides to extend or not the field of application of the certificate following the normal procedure (see paragraph Certificate granting).

NOTE 1: An increase or decrease in the group member's number is not considered a change of scope unless, in the opinion of Bureau Veritas Certification, the change requires significant changes to the group certification holder's management systems.

NOTE 2: A change of scope may be necessary as a result of changes in ownership, structure of the organization, or management systems.

In case of scope modification requirement, the certificate holder shall return its old certificate in order to receive a new one with the new wording for the scope.

12.3. Re-Certification Audit

At the end of the five years, the certification contract can be renewed. To do so, Bureau Veritas Certification proceeds with a complete new assessment of the certified organization (comparable to the initial audit). Afterwards, the certification process is carried out in the same way as previously.

12.4. Period of validity of a certificate

The period of validity of a certificate is five (5) years.

13. Suspension or withdrawal of the certificate

A certified organization practice or non-completion of a corrective action, leading to one or several nonconformities to the requirements defined within the RSPO P&C standard can be brought to Bureau Veritas Certification's knowledge.

During a conflict or after denunciation of a nonconformity, Bureau Veritas Certification makes sure of the truthfulness of the collected information and reports to the Certification decision maker. In all cases, NC are expressed if necessary.

The Certification decision maker then makes a decision depending on the importance of the

nonconformity, which is judged in the following manner:

- If the nonconformity is due to an involuntary action, it justifies a conditional maintaining of the certificate. The certificate is maintained subject to the carrying out of the corrective action(s) requested by the certification decision maker, within a period of time that it defines;
- If the nonconformity is due to a deliberate action, it justifies, depending on the seriousness of the facts, a temporary suspension or a definitive withdrawal of the certificate.

In case of serious and indisputable failure to comply with the requirements of the standard or the label conditions of use, Bureau Veritas Certification remains authorized to suspend or withdraw the certificate, temporarily and without concertation with the Certification decision maker.

There is no partial withdrawal within the scope of RSPO P&C certification. A withdrawal always concerns the whole certificate. For multi-site or group certification, it means all the sites of the certificate will be either suspended or withdrawn.

Bureau Veritas Certification will suspend certification at latest 6 months after the closing meeting of a surveillance audit if a certification decision to maintain the certification cannot be taken due to circumstances beyond its control (for example if client or other parties prevent from the use of audit findings and/or delayed or declined acceptance of audit findings...).

BVC will inform the RSPO within one day, together with the effective date and justification of suspension or withdrawal. The RSPO will update and announce the status of the certificate in the RSPO website database based on the information given by the BVC within seven days.

In order to remove a suspension of certificate, a complementary (documentary or field) audit should take place in order to check the carrying out of the requested corrective action(s). The certificate can then be granted again. In case the requested corrective action(s) is (are) not raised, the certificate is then withdrawn.

Suspension of a certificate cannot last more than 6 months. The previously certified entity can from this point no longer claim RSPO certification, and all trading of its RSPO certified oil shall cease. Any remaining stocks of certified palm oil shall then be considered as uncertified.

The RSPO Secretariat may instruct a CB to suspend or withdraw a certificate. In such cases the CB will implement the request within five days. This must be based on the internal processes and decisions within the RSPO Secretariat.

14. Complaints and Appeals process

Complaints and appeals management procedure can be download from Bureau Veritas Certification website. For information about this procedure, Bureau Veritas Certification may be contacted.

Complaints and appeals are registered directly on-line by the party (person or organization applicant) on either the global Bureau Veritas Certification website and/or directly on the Bureau Veritas Certification local office's website.

14.1. Complaints

It's a formal expression of dissatisfaction (different from an appeal) relating to the activities of Bureau Veritas Certification and/or its subsidiaries.

14.2. Appeals

The applicant or certificate holder may request for reconsideration of a certification decision or non-conformity issuance related to its certification status.

15. Applicable standards for RSPO P&C Certification

15.1. RSPO Principles & Criteria

Bureau Veritas Certification is auditing unit of certification based on RSPO Principles and Criteria and validated by the RSPO during the accreditation procedures. Generic standard adaptation procedures to different local contexts are validated as well.

15.2. National Interpretation

Most countries in the world have their national standard at their disposal today (indeed, concerning the United-States for example, several local standards). These local standards are also based on RSPO Principles and Criteria and validated by the RSPO. Nevertheless, they were established by RSPO local working groups.

When a country has at his disposal a standard adapted and validated by RSPO, that standard is the standard to be respected for all RSPO P&C certifications in the country. When there is no local standard approved by RSPO, the certification body wishing to certify a unit of certification must adapt its generic standard to the local context, following the adaptation procedures validated by RSPO.

Nevertheless, if one of these countries develop its own national standard, via a working group recognized by RSPO, that national standard will become the document to be respected and will replace the standard adapted by Bureau Veritas Certification.

15.3. RSPO Independent Smallholder Standard

The RSPO Independent Smallholder Standard was developed in response to the growing recognition by stakeholders for the need to increase smallholder's inclusion into the RSPO system through a mechanism that takes into consideration the diversity of challenges and situations faced by smallholders globally, together with their varying needs and concerns. This standard complements the 2018 RSPO Principles and Criteria for the Production of Sustainable Palm Oil (2018 P&C).

16. Management of change

The company must inform Bureau Veritas Certification within ten (10) days of changes in the ownership, structure of the organization (e.g. changes in key managerial staff), certified management systems or circumstances which relate to the implementation of RSPO certification requirements.

A change of scope may be necessary as a result of changes in ownership, structure of the organization, or management systems.

If a standard is revised, Bureau Veritas Certification will contact the client and communicate the actions to be done to get the certification against the new standard revised. Clients that were certified prior to the effective date of approval of a new or revised applicable RSPO normative document shall be audited against the requirements of the new or revised document in accordance with the applicable transition requirements.

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