

## Changes to the RSPO SCC Standard

### Changes in Layout

The following parts are now included as annexes:

- ✓ Module F: Multi-site Certification (before part of Chapter 6),
- ✓ Module G: Supply Chain Group Certification (before part of Chapter 6),
- ✓ RSPO Rules for Oleochemicals and its Derivatives (before separate document RSPO-PRO-T05-003 V2.0 ENG),
- ✓ Guidance Document for RSPO SCC of Food Service Company / Companies (before separate document RSPO-GUI-T05-011 V1 ENG)

### Changes in Content

#### For all Supply Chain Actors

- It has been clarified that re-labelling is also a physical activity and therefore requires Supply Chain certification

P5 Standard

**End Product Manufacturer** = The manufacturer/processor that uses oil palm products for manufacturing products designed and intended for consumption or end use in any way without further processing and/or repackaging and/or **relabelling**. For example, retailers who produce own label products in-house, consumer goods manufacturers, biofuel producers, and feed product manufacturers. Retailers and distributors of end products, where no further modification occurs, do not need Supply Chain Certification.

P7 Standard

**Relabel** = Any changes to the original label on the RSPO certified material.

- It was emphasized that a company wishing to trade RSPO products must have a valid license. The RSPO-certificate is valid for 5 years. The certificate is only valid if there is an active licence in PalmTrace. This license must be renewed annually through an audit (with positive result).

P6 Standard:

**Licence** An annual request submitted by an accredited CB in RSPO IT Platform when a certificate holder successfully undergoes an audit within the five-year certificate validity. Upon approval from the RSPO Secretariat, the licence allows a certificate holder to carry out trading and record transactions. **A licence is valid for one (1) year and needs to be renewed after the completion of every audit. The RSPO products cannot be traded as RSPO certified without a valid licence.**

- The internal audit should be performed by a person who is aware of the requirements of the standard, and he/she should not audit his own work. The non-conformities identified during the internal audit must be effectively resolved within a reasonable period of time.

P10 Standard:

5.3.3. The organisation shall ensure that:

a) Internal audits are conducted by personnel knowledgeable in the requirements of this standard;

**b) Internal auditors do not audit their own work;**

**c) Any non-conformities found during internal audit shall be issued corrective action and actions shall be taken in a timely and appropriate manner.**

5.3.4. The results of the internal audit and all actions taken to correct non-conformities shall be subject to management review at least annually.

5.3.5. The organisation shall maintain the internal audit records and reports

- Checking the licenses/certificates of your suppliers should now be done **monthly** instead of annually.

P10 Standard:

5.4.3. The site receiving RSPO certified oil palm products shall ensure that the products are verified as being RSPO certified by:

- a. checking the validity of the Supply Chain Certification of the suppliers via the list of RSPO Supply Chain Certified sites on the RSPO website ([www.rspo.org](http://www.rspo.org)) **on monthly basis**; or
- b. checking the validity of licence for traders and distributors via the list of Licence Holder on the RSPO website ([www.rspo.org](http://www.rspo.org)) **on monthly basis**; or
- c. through the RSPO IT Platform by confirmation of (shipping) announcements.

- It was clarified that the reporting of new contractors or subcontractors should be done **before** the audit.

P11 Standard:

5.5.4 The site shall inform its CB **in advance** prior to conduct its next audit of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products.

- The training plan must now be reviewed annually (previously: on-going review) and it has been clarified that you must keep the evidence of the training provided.

P13 Standard:

5.8.1 The organisation shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to **annual review** and is supported by records of the training provided to staff.

**5.8.3 Training records shall be maintained.**

- It has been clarified which data are required for the annual volume report. A period of 1 year must be considered for all audits except for the initial audit (no data required) and the first surveillance audit (here the data may be over a period of less than a year)

P14 Standard:

5.9.3 Where exact quantities are not available, the organisation shall provide a calculated approximate of the aggregated volume of palm oil/palm kernel oil content (separate categories) used in the RSPO certified oil palm products, as shown in the table below. The organisation shall keep an up-to-date record of the volume purchased (input) and actual or estimated claimed (output) over a period of twelve (12) months, except for the period prior to Annual Surveillance Audit 1<sup>4</sup> (ASA1). This record is required for audit purposes.

<sup>4</sup> **As ASA1 shall be conducted between 8 to 12 months of the certificate issued date, the period will be less than 12 months**

- In the chapter related to the management review, “Customer feedback” was replaced by “Stakeholders feedback”. In the section “Resources” it was further specified that it concerns the RSPO system.

P15 Standard:

**5.13. Management review**

5.13.1 The organisation shall conduct annual management reviews at planned intervals, appropriate to the scale and nature of the activities undertaken.

5.13.2 The input to management review shall include information on:

- a) Follow-up actions from previous management reviews.
- b) Results of internal audits covering RSPO Supply Chain Certification Standard.
- c) **Stakeholders' feedback.**
- d) Status of preventive and corrective actions.
- e) Changes that could affect the management system.
- f) Recommendations for improvement.

5.13.3 The output from the management review shall include any decisions and actions related to:

- a) Improvement of the effectiveness of the management system and its processes.
- b) Resources needed **for effective implementation of the system.**

- For companies that do Mass Balance: it is not possible to opt for a “fixed inventory period” and a “continuous accounting system” at the same time.

P20 Standard:

C.3.2 The site shall ensure that the output of RSPO mass balance oil palm product supplied to customers from the physical site does not exceed the input of RSPO certified oil palm products received at the physical site, using either a continuous accounting system (refer to C.4.1) and/or a fixed inventory period (refer to C.4.2). **The site shall establish only one accounting system at a time.**

Only for Multi-sites

- More explanation is given about participating sites in the multi-site certification. If the head office is also a production site, it is only counted once in the audit sample calculation. If the head office is also the ICS office (place where the Internal Control System is managed), it is considered a participating site, even if there is no production. It should also be noted that a site that is not a production site but that does the invoicing of RSPO products is also counted as a participating site. This has not been interpreted by us like this before and may therefore have consequences for the certificate of your company. Your auditor will inform you of this during the audit.

P24 Standard:

- 1.2. The Central Office acting as ICS office is considered a participating site.
- 1.3. Central Office that also has a production site is counted as one site.

Only for companies that produces Oleochemicals

The separate document “RSPO Rules for Oleochemicals and its Derivatives” (RSPO-PRO-T05-003 V2.0 ENG) is now added to the standard as ANNEX 6.

- The “MB claim transfer cross referencing” is now permitted for glycerine but only if there is proof that the precursor or the C-chain reference have the same PO or PKO source.

P45 Standard:

**4.2.3 MB claim transfer cross referencing**

The transfer of an MB claim inside a specified section as marked in red (see graph 6) is allowed. For example, from a fatty acid to a fatty alcohol or from a sodium laureth - 2 sulfate to a betaine, shall be allowed. Glycerin is excluded from cross-referencing as glycerin neither has a precursor identity nor a C-chain reference<sup>5</sup>.

<sup>5</sup> **In cases where there is evidence of the precursor or C-chain reference of the glycerin, demonstrating the same source (PO or PKO); the MB claim transfer cross referring is allowed.**

- It was omitted that new conversion factors must be reported to RSPO

- It was clarified that the conversion factor of a product reflects the amount of PO/PKO in the final product independent of the processed volumes.

P47 Standard:

**4.4. Guiding principle to calculate Secondary Oleoderivative conversion factors**

The conversion factor (e.g. 1 = 100% PO/PKO content) of a product indicates the amount of PO/PKO which is present in the final product independent from processed amount of material.

- Some changes in the conversion factors:

Table 4 Standard:

11 Sodium Stearate 0.7 (before 0.9)  
 12 Palm Kernelate 0.7 (before 0.9)  
 41 Carboxylic acid soap 0.7 (before 0.9)  
 47 Methyl Ester Sulphonate (MES) 0.7 (added)

Only for Refineries/Mills

- All companies (refineries or traders) that purchase directly from the mill must now keep a list of the mills from which they purchase oil. This list must be updated and made public every 6 months.

P11 Standard:

5.4.5 For refineries/traders involved in primary procurement (i.e. purchasing directly from a mill), the site shall maintain a list of all supplying mills (certified and non-certified). The list shall include mill name, GPS coordinates, parent company, country, and the identity of the mill in the Universal Mill List (UML ID1) (if applicable). The UML ID can also be found in the 'declaration of the conventional sources' list in the RSPO IT Platform. The list shall be updated on a six monthly basis and shall be made publicly available.

- Transactions in PalmTrace must be registered within 3 months (before this was not specified or annually for Tracing). Removals must be done within the license period (compared to not specified before)

P13 Standard:

5.7.2 The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:

- a) Shipping Announcement: Shall be carried out by the mills when RSPO certified products are sold as RSPO certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the date recorded on the Bill of Lading or the dispatch documentation.**
- b) Confirm on Shipping Announcement: Shall be carried out by refineries, crushers, and traders within three months of the issue of the Shipping Announcement.**
- c) Announcement: Shall be carried out by refineries, crushers, and traders when RSPO certified products in the yield scheme (Figure 2 and Figure 3, Annex 1) is sold as RSPO certified. The announcement shall be carried out within three months of the physical delivery of the products.**
- d) Confirm on Announcement: Shall be carried out by refineries and traders within three months of receipt of the certified products.**
- e) Trace: Shall be carried out by the refineries and traders when RSPO certified products are sold as RSPO certified to actors in the supply chain beyond the refinery. The volume shall be traced within three months after physical delivery. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way.**
- f) Remove: RSPO certified volumes sold under other schemes or as conventional, or in case of underproduction, or lost or damaged shall be removed. The volume shall be removed within the licence period.**