

CHAPTER 16

RSPO P&C CERTIFICATION RULES



CONTROL UNION SERVICES S.A.C.

1. INTRODUCTION

The RSPO P&C rules contain regulations on the assessment and certification activities of Control Union Services S.A.C (hereinafter “CU Services”).

This documents refers to the rights and obligations of the client and CU Services, and complements the General Certification Rules (P12.CONTR.A02 Chapter 1), applicable to all programs certified by CU Services. This document is available on the website: peru.controlunion.com

This document describes the general conditions, requirements, and rules applicable to the RSPO P&C 2018, Independent Smallholders (ISH), and New Planting Procedure (NPP) certification processes, administered by Control Union Services, and is mandatory for all applicants and certified clients.

2. REFERENCE DOCUMENTS

RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard 2018
 RSPO New Planting Procedure (NPP) 2021
 RSPO-PRO-T01-002 Requirements for Certification Bodies Certifying against the 2018 RSPO Principles and Criteria (P&C) and RSPO Independent Smallholder (ISH) Standard.
 RSPO Management System Requirement for Group Certification of FFB Production 2022
 RSPO Independet Smallholder Standard 2019

3. DEFINITIONS

Annual Surveillance:	Annual systematic repetition of conformity assessment activities as a basis for maintaining the validity of RSPO certification.
Eligibility	First phase of the RSPO ISH Standard, for those who are eligible, allow time for continual improvement and progress towards meeting all requirements of the RSPO ISH Standard.
FPIC:	Free, prior and Informed consent. The general requirement of FPIC is that members engage in a process that involves discussions, consultations, mapping and consent with communities, prior to any oil palm plantation development
GHG Assessment:	Greenhouse gas assessment to identify and estimate carbon stocks and major potential sources of emissions in the proposed development area (also called the carbon stock assessment)
HCS (High Carbon Stock):	A classification approach used to identify and protect forest areas with significant carbon storage, ensuring that RSPO-certified operations avoid deforestation and maintain high-carbon forest landscapes during land-use planning and development.
High Conservation Value (HCV)	A set of biological, ecological, social, and cultural values of outstanding importance that must be identified, maintained, and enhanced within RSPO-certified operations to ensure responsible and sustainable palm oil production.
IMU (Independent Monitoring Unit)	An independent entity designated to monitor, assess, and objectively report on compliance with RSPO standards, procedures, and requirements, ensuring the transparency, credibility, and integrity of the certification system.
Initial Certification:	The beginning stage of the certification cycle where the decision of certification and issuance of certificate was done
LUCA:	Land Use Change Analysis. A land use change analysis (LUCA) should use historical remote sensing imagery (of land cover) to demonstrate there has been no conversion of primary forest or any area required to maintain or enhance HCVs since November 2005 and HCS from November 2018
Milestone A (MS A):	Second phase of the RSPO ISH Standard. Compliance at every milestone is measured by fulfilling all the requirements of the current milestone and all preceding milestones. To be compliant with MS A, the smallholder group must demonstrate compliance to the Eligibility requirements and requirements of MS A.

Milestone B (MS B):	Full compliance of RSPO Independent Smallholder Standard. CU Services shall conduct an Initial Certification audit followed by the annual surveillance and recertification audits according to the requirements laid out in the Certification System document
National Interpretation:	An adaptation of the RSPO Principles & Criteria for use in a particular country.
Non-compliance (NC)	Non-fulfilment or lack of evidence of fulfilment of an RSPO requirement. NCs are graded into two categories, i.e. minor and major NCs. The grading of the NC shall follow the indicators. Indicators marked with (C) indicate Critical and any NC against this indicator (i.e. indicator marked as (C)) shall be graded as Major NC. Non-compliance against indicators without marking with (C) shall be graded as Minor NC.
NPP verification	NPP verification is the independent review of a company's compliance with RSPO requirements for new plantings, ensuring that environmental, social, and legal criteria are met prior to land development.
Out growers:	Oil palm farmers with more than 50 hectares in size who produce FFB for sales, but without mill. Out grower can be independent, i.e. independent growers, or associated with a mill, i.e. scheme out growers
Peer Reviewer	An external, independent, and competent person who reviews the audit report prior to the certification decision. Their role is to provide an impartial technical opinion to ensure that the report is consistent, complete, and accurate, guaranteeing the quality, credibility, and impartiality of the process. They cannot be part of the audit team or an employee of CU Services to avoid conflicts of interest.
Recertification:	Audit of an organization for renewal of RSPO certification before expiry of the current valid certificate.
RSPO NPP (New Planting Procedure) document:	The RSPO New Planting Procedure (NPP) consists of a set of assessments and verification activities to be conducted by growers and certification bodies (CB) prior to a new oil palm development, to help guide responsible planting. The NPP applies to any development of new plantings, regardless of size (ha). The intention is that new oil palm plantings will not negatively impact primary forest, High Conservation Values (HCV), high carbon stocks (HCS), fragile and marginal soils or local people's lands. A successful implementation of NPP ensures that all the indicators of the RSPO Principles and Criteria (P&C) 2013 Principle 7 are being implemented and therefore in compliance when the new development starts.
Scheme Smallholders:	Farmers, landowners or their delegates that do not have the: Enforceable decision-making power on the operation of the land and production practices; and/or Freedom to choose how they utilize their lands, type of crops to plant, and how they manage them (whether and how they organize, manage and finance the land).
SEIA:	Social and Environmental Impact assessment.
Stakeholders:	An individual or group with a legitimate and/or demonstrable interest in, or who is directly affected by, the activities of an organization and the consequences of those activities
Transfer of certification:	The transfer of certification is defined as the recognition of an existing and valid certification issued, by an accredited certification body (CB), (the 'issuing CB') and accepted by CU, (the 'accepting CB') for the purpose of issuing or maintaining a certification, or vice versa.
Unannounced audit/assessment:	It is an additional audit conducted in response to, for example, a complaint against or identified potential risk linked to the integrity of the certificate issued to the certified organization.

4. CERTIFICATION OPTIONS

- a) Certification type, audit scope and certification option applicable will be determined based on the RSPO requirements and the application review of CU Services. These elements are not discretionary for the applicant and must be defined according to the applicable RSPO Certification System.

- b) CU Services may combine RSPO audits with other schemes, provided that impartiality, competence and RSPO-specific requirements are not compromised.
- c) Applicants acknowledge that the options and scope of certification are determined solely in accordance with RSPO standards and not by customer preference.

4.1. RSPO PRINCIPLES & CRITERIA (P&C)

The description of the certification options is presented at an informational level for the applicant, in accordance with applicable RSPO requirements.

RSPO Principles & Criteria (P&C) is structured as a series of principles, criteria, indicators and guidance, and is designed to be used by palm oil growers and millers to implement sustainable production practices.

The unit of certification shall include both directly managed land (and estates) and scheme smallholders and outgrowers, where estates have been legally established with proportions of lands allocated to each. CU Services will determine the status of the smallholders at the time of the assessment.

Note: The RSPO National Interpretation (NI) of the RSPO P&C shall be used when the applicable NI has been endorsed by the RSPO Board of Governors (BoG). In cases where an NI has not been endorsed, the latest version of the RSPO P&C shall be used for the audit. The RSPO P&C are also designed to be used before, during and after any land is developed for oil palm plantings.

RSPO Principles and Criteria (P&C)		
Certification Units	Audit types	Remarks
1 Supply Base + 1 Mill 1 Supply Base + >= 2 Mills (*)	Initial Certification	The beginning stage of the certification cycle Before proceeding, CU Services shall ensure that: <ul style="list-style-type: none"> • The Organization shall be a member of RSPO (CU Services shall check on the RSPO website: https://rspo.org/search-members/) • The client has submitted to the RSPO Secretariat the Disclosure of Non-Compliant Land Clearing (Annex 2 of the RaCP). CU Services shall check directly with the RSPO Secretariat via email of the submission of the form (rspocompensation@rspo.org) the procedure shall be completed prior to entering a contract.
Plantation only (**) For group certification: Group Manager + group members (***)	Annual Surveillance	<ul style="list-style-type: none"> • The first annual surveillance audit shall be undertaken within 12 months of the certificate issue date, but not earlier than eight (8) months after the certificate issue date. • The subsequent annual surveillance audits shall be undertaken within 12 months of the license expiration dates, but not earlier than eight (8) months after the expiration date
	Recertification	<ul style="list-style-type: none"> • RSPO recertification audit shall be undertaken once every five years. • Recertification audits shall be undertaken within 12 months of the license period date, but no earlier than eight (8) months after the original expiry of the previous license date

*Where more than one mill shares the same supply base, deviations shall be requested from the RSPO Secretariat to include more than one mill on a single certificate. Certifier request formal authorization from the RSPO secretariat to allow two or more mills that share the same supply base to be certified together under a single certificate. CU Services must identify at the time of the application whether the organization has more than one mill with the same supply base.

CU Services await approval from the RSPO secretariat before issuing the offer.

**Where organizations are managing plantations only, with no integrated mill, or where the mill is not yet established, the requirements in the P&C relating only to mills are not applicable.

***For group certification other than ISH, the RSPO Management System Requirements and Guidance for Group Certification of FFB Production is applicable.

4.2. RSPO INDEPENDENT SMALLHOLDERS STANDARD (ISH)

RSPO Independent Smallholders Standard (ISH) was developed in response to the growing recognition by stakeholders for the need to increase smallholders' 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) and is only applicable to those smallholders that qualify as Independent Smallholders as defined in the standard

RSPO Independent Smallholders (ISH)		
Certification Unit	Audit types	Remarks
Group manager + 100% ISH	Eligibility (E)	It will only take place in year 1. No audit is required in year 2.
	Milestone A (MS A)	This will be conducted no later than four (4) months before expiry of the Eligibility certificate (i.e. audit shall be carried out on the 20 th month of the Eligibility certification)
Group members	Milestone B (MS B)	The initial certification of MS B phase shall be conducted no later than five (5) months before the expiry of the MS A certificate. The first annual surveillance of MS B phase shall be conducted within 12 months of the certificate issue date, but not earlier than eight (8) months after the certificate issue date. The subsequent annual surveillance audits shall be undertaken within 12 months of the license expiration, but not later than four (4) months before the license expiry

4.3. NEW PLANTING PROCEDURE (NPP)

The RSPO New Planting Procedure (NPP) specifies a subset of RSPO P&C that must be independently evaluated prior to any development of new plantings.

NPP must be implemented before a grower commences land preparation, including any associated development, for new oil palm planting (except Independent Smallholders pursuing RSPO Independent Smallholders Standard)

RSPO New Planting Procedure (NPP)		
Verification Options	Audit types	Remarks
Newly acquired Land	Natural Ecosystem	All land with natural, native vegetation, including but not limited to native forests, riparian vegetation, natural wetlands, peatlands, grasslands, savannahs and prairies
Land expansion from existing Area	Abandoned Land Re-clearing (unmanaged for more than 3 years)	Clearing of land previously converted/developed and neither a new development nor new land clearing

CU Services reviews the RSPO website to ensure whether there is National Interpretation available and endorsed by RSPO to the applicable country when selecting the audit scope.

4.4. SCOPE CONSIDERATIONS

- a) The scope of a P&C certificate cannot include processing activities performed by other entities. Therefore, mills cannot outsource processing of FFB activities. A mill wanting to certify its palm oil products (e.g. CPO and PK) shall carry out all related processing activities.

- b) It is possible that CU Services may combine RSPO audits with other certification audits, when possible and appropriate at the discretion of CU Services and the client.

5. CONTRACTING

5.1 APPLICATION

- a) The certification programs offered by CU Services are published through various media (web, social networks, fairs, email, etc.)
- b) CU Services provides organizations seeking certification at minimum with the following documents: standards to be used, application form, the CU's general terms and conditions and details of the appeals and complaints procedures. Contracting and normative documents are available on CU Services website.
- c) Applicants complete the application form. The application shall be completed and returned to CU Services by an authorized representative of the potential client.
- d) With this information, CU Services will be able to make a suitable and comprehensive offer to the client based on the CU Services RSPO tariff (RSPO.CONTR.F04).
- e) Before initiating any audit, during the application phase it will be reviewed the RSPO membership and presentation of Disclosure of Non-Compliant Land Clearing (RaCP).
- f) Follow-up: If there is no response after a defined period (1 week), CU Services shall contact the (potential) client by a reminder call or email.

5.1.1. TRANSFER OF CERTIFICATE

- a) If the applicant wants to request a transfer from another CB to CU Services, then the application form is filled specifying the request for transfer.
- b) CUServices will review the eligibility of the transfer. CU Services request, to the applicant and to the issuing CB, all necessary information to evaluate the feasibility of the transfer. It may be necessary to have a pre-transfer visit to evaluate implementation of corrections and corrective actions of major NCs.
- c) If pre-transfer review is positive, then applicant can be offered a quotation and will keep the certification cycle.
- d) If pre-transfer review is not positive, applicant starts as new client and can be offered a quotation to start a new certification cycle; or due to results applicant cannot be offered.

5.2. APPLICATION REVIEW

- a) CU Services reviews the application to confirm that all required fields are completed including scope, site locations, outsourcings, and others.
- b) For the application, the client or its parent organization is an RSPO member. In case the membership status is in doubt, CU Services shall contact the RSPO Secretariat and check in the RSPO website whether the client is already registered as a member: <https://rspo.org/search-members/>
- c) The client has submitted to the RSPO Secretariat the Disclosure of Non-Compliant Land Clearing (Annex 2 of the Remediation and Compensation Procedure (RaCP). The certifier shall cross-check with the RSPO Secretariat of the submission of formal communication via email.
- d) CU Services has the competence and ability to perform the certification activity.
- e) The scope of certification sought, the site(s) seeking certification, time required to complete the assessment including time for stakeholders' consultation, and any other points influencing the certification activity are taken into account (e.g. language, safety conditions, threats to impartiality, etc.).
- f) There is no potential conflict of interest nor is impartiality at stake.
- g) CU shall not accept any contracts from its certified clients in relation to the verification and/or investigation of complaints.
- h) Once the application is reviewed, CU Services conducts a risk assessment.

5.2.1. RISK ASSESSMENT

- a) The risk assessment summarizes key operational, environmental, social, and compliance factors that may influence the integrity of the RSPO certification process. By evaluating elements such as the scale and diversity of sites, potential contamination risks, stakeholder concerns, and the experience of personnel, the assessment provides an objective basis for determining the overall risk level of the operation. This classification supports audit planning, resource allocation, and the effective implementation of controls within the RSPO management system.
- b) The result of this evaluation will determine the risk factor for the audit sampling and in accordance with the RSPO P&C Planning procedure.

5.3. OFFER

- a) Once the application is filled and reviewed and the risk assessment conducted, then CU Services calculate the days to prepare the offer letter.
- b) As a general guideline, the duration of the site audit of a management unit consisting of one mill and one estate should be nine (9) man-days. However, the duration of the site assessment will depend on other factors, such as the size and complexity of the operation, geographic context, known community issues, risk, etc. The final duration of the audit is determined by the conformity of the applicable requirements of RSPO and the planning procedure of CU Services.
- c) In some cases, based on risk or complaints, unannounced audits must be carried out to high risk certified operators. These audit fees are not included in the offer and will have to be charge to the client separately. Decision of conducting an unannounced audits is approved by certifier.
- d) Applicants have the obligation to give CU Services proper access to facilities, provide accurate information, continuous compliance with RSPO requirements, correct use of trademarks, timely notification of significant changes and acceptance of unannounced audits. Applicant can review all rights and obligations on the terms of contract of Control Union Services S.A.C and CU Services certification general rules chapter 1.

6. PLANNING

6.1. PLANNING

- a) The certificate holder confirms to CU Services about the weather conditions; they have to give the guarantee that the audit will be carried out without any problem. If the audit cannot be fully carried out due to weather conditions, additional audit days will be added.
- b) Based on the type of audit there are some considerations at the moment of planning an audit.

RSPO P&C	Remark
Initial Certification Audit (IC)	First Audit of a new client (never been certified) Can only be excuted once public announcement has been approved by RSPO minimum 30 days before the audit starts.
Surveillance Audit (ASA)	ASA1: Audit shall take place between 8 – 12 months after the certificate issued date. ASA2-4: Audit shall take place between 8 – 12 months before the expiration date. Time extension: Certificate holder (CH) can request an extension of the license period for maximum of three months. If requested, CH will have additional time to schedule the audit. License extension must be requested and approved by RSPO before license expiration date.
Recertification Audit (RC)	Shall take place within 12 months if the license period date, but not earlier that eight months after the original expiry of the previous license date Time extension: A time extension of up to maximum three months can be granted.

	If certification decision is taken after the maximum extension period, the certification cycle will restart from the date of the audit decision.
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Audit type for	Remark
ISH	Eligibility (E) a. Only takes place at year 1. b. No audit is required in year 2. c. After positive result of this audit, certifier issues an eligibility certificate with two years validity. d. The group has maximum these two years to comply with MSA requirements.
	Milestone A (MSA) a. This audit must be planned at least 4 months prior to the expiration of the eligibility phase. b. After positive result of this audit, certifier issues the MSA certificate with one year validity.
	Milestone B (MSB) a. After initial MSB audit is conducted. The first surveillance audit of MS B phase shall be conducted within 12 months of the certificate issue date, but not earlier than (8) months after the certificate issue date. The subsequent annual surveillance b. Audits shall be undertaken within 12 months of the licence expiration, but not later than four (4) months before the licence expiry.
NPP verification	a. NPP verification is planned when requested by client that new plantations wants to be installed. b. The NPP verification onsite audit can exceed the minimum 1-day allocation depending on the risk of the organization. The risk is defined as indicated in the risk assessment stated on RSPO.CONTR, which is approved by certifier. c. To check whether the FPIC process has been initiated in a way agreed to by the local people, CU must hold meetings with the self-chosen representatives of the communities concerned and carry out randomized interviews with a range of members of the communities, to assess the inclusivity of the process and ensure that processes have been participatory.

6.2. PUBLIC ANNOUNCEMENT

- a) For initial and recertification audits for P&C and audits at Eligibility, MSA, Initial (MSB) and recertification audits for RPSO ISH, CU Services requires RSPO to make a public announcement on their website of the audit at least one month prior to its start.
- b) The public announcement must be done in English and in national language. For that purpose, after receiving and application these types audits, client will be requested to fill both public announcement formats in English and national language.
- c) Prior to make the announcement, certifier checks with RSPO of the management unit liability. If there is liability, the public announcement only proceed when the concept note has been submitted to the RSPO Secretariat. This requirement does not apply to the ISH group.
- d) The public announcement must be published by RSPO at least 30 days before the audit start date.
- e) CUServices can't execute an audit if the public announcement has not been sent to RSPO on enough time for review. It is a recommendation to send the public announcement 2 months before the audit start date.
- f) If public announcement is not sent before 30 days of the audit start date, audit must be rescheduled.

6.3. UNANNOUNCED AUDITS

- a) CU Services can propose the execution of an unannounced audit/assessment in response to a complaint against the organization or an identified potential risk linked to the integrity of the certificate issued to the certificate holder.

- b) For those cases, CUServices does not announce the dates of the audit.
- c) For logistics purposes, auditor sends the audit plan at least three (3) working days before the audit after confirmation of the audit dates by the planner and certifier.
- d) The same team auditor that carried out the last audit can't be considered for the execution of the unannounced audit.

7. AUDIT

- a) During the inspection, all clients will be evaluated under the RSPO requirements. For group and smallholders there will be sampling procedures to define the number of sites to be visited during the evaluation.
- b) CUServices selects a sample based on the applicable scope of the client.

7.1. SAMPLING

- a) Sampling is done like the following formula: $x = (\sqrt{y}) \times (z)$, where y is the number of estates and where z us the multiplier defined by the risk assessment. Risks factors are considered as follows and based on the RSPO scope.

Risk level	Type of risk	Multiplier Z
Level 1	Low risk	Multiplier Z = 0.8
Level 2	Medium Risk	Multiplier Z = 1.2
Level 3	High Risk	Multiplier Z = 2

- b) The sampling methodologies described in this chapter are provided for transparency purposes and comply with the applicable RSPO requirements. These descriptions are for informational purposes only and do not constitute exhaustive operational instructions. Control Union Services may adjust the sampling intensity, the number of sites or members to be assessed, and the selection strategy based on the risk assessment and mandatory RSPO instructions, in accordance with its internal planning procedures and the applicable requirements of the RSPO system.

8. CLASSIFICATION OF NON CONFORMITIES

- a) Based on the scope, non conformities can be classified as follows:

RSPO P&C:

Type of NC	Deadline for closure
Major NC	Initial: 12 months after closing meeting. Surveillance and recertification: 90 days after the audit or certificate is suspended.
Minor NC	By the time of the following audit.

RSPO ISH:

Type of NC	Deadline for closure
Major NC	Eligibility: Within 12 months of the audit. MS A: 1 month before the expiration of the eligibility certificate MS B: 2 months prior to the expiry of the MS A certificate. For surveillance audits: Within 90 days of the closing meeting.

- b) Recurring major NC on the same indicator in successive audits shall lead to immediate suspension.
- c) Recurring minor NC on the same indicator in successive audits shall be raised to major.
- d) For ISH, all indicators at E, MSA and MSB are considered as critical indicators so lead auditor shall raise them as major NCs.

9. CERTIFICATION DECISION

9.1. CONSIDERATIONS FOR CERTIFICATION PROCESS

- a) The certification decision will be made by authorized personnel of the certification body, independent of the audit team, and will be based on a review of all relevant information from the audit process, including compliance with the applicable RSPO P&C, ISH, and/or NPP requirements also includes the evaluation of the FPIC, HCV, HCS, LUCA and stakeholder concerns.
- b) When an organization only applies for plantations without a processing plant, the requirements of the RSPO Principles and Criteria that relate exclusively to processing plants are not applicable.
- c) All land (or farms) managed directly under the scope of the certification must comply with the requirements of the RSPO Principles and Criteria in order for the certificate to be granted.
- d) For New Planting Procedure (NPP) verifications, the assessment must cover all Principles, Criteria, and Indicators of the RSPO Principles and Criteria referenced in the RSPO NPP document, ensuring that the certification decision is based on complete and traceable evidence of compliance.
- e) Any unresolved stakeholder concerns are considered prior to certification decision.
- f) For NPP verification, CU Services confirms that a risk-based approach has been applied to determine the need for field verification. High-risk developments (e.g. proximity to protected areas, presence of HCVs, land tenure conflicts, greenfield developments) shall require field verification. Low-risk developments may be verified through desktop review, provided sufficient objective evidence is available.

9.2. REVIEW OF NEW PLANTING PROCEDURE (NPP) VERIFICATION RESULTS

- a) For New Planting Procedure (NPP) verifications, the certifier ensures that the audit and verification process has been conducted in accordance with the RSPO New Planting Procedure latest applicable version and applicable RSPO mandatory requirements.
- b) For NPP verifications, CU Services shall use the official RSPO document “RSPO New Planting Procedure – Verification: Checklist for Auditors” (latest applicable version) to verify compliance with the RSPO NPP requirements and applicable RSPO P&C indicators at the new planting stage.
- c) The review confirms that the NPP report:
 - Follows the RSPO NPP reporting template;
 - Includes all required assessments (SEIA, HCV, soil and topography, land use change, GHG);
 - Contains management plans addressing identified environmental and social risks; and
 - Clearly defines scope, boundaries and proposed development areas supported by maps and shapefiles.
- d) CU Services verifies that the public notification period has been completed, that all comments and objections received through RSPO channels have been adequately addressed by the grower, and that no active objection remains in PRISMA prior to issuing the NPP Verification Statement or granting certification.
- e) CU Services confirms that the latest applicable versions of RSPO NPP, FPIC mandatory requirements, National Interpretations and RSPO templates have been used during verification.

9.3. FPIC ASSESSMENT REVIEW (NPP)

- a) For NPP verifications, CU Services shall specifically review the Free, Prior and Informed Consent (FPIC) process in accordance with the RSPO Mandatory Requirements for Certification Bodies in Assessing FPIC in NPP.
- b) The review includes, but is not limited to:
 - Evidence that FPIC was conducted prior to land development;
 - Identification of affected communities and legitimate rights holders;
 - Records of consultations, meetings and agreements;
 - Evidence that information was provided in an appropriate language and format;
 - Documentation of grievance handling related to land rights; and

- Confirmation that consent was obtained without coercion and is demonstrated through documented agreements.
- c) All FPIC-related evidence, including agreements, consultation records, maps, grievance records and community engagement documentation, shall be retained in the audit file and be fully traceable to the specific NPP area verified.
- d) The certifier verifies that land-related grievances and disputes have been identified, documented and addressed through an operational grievance mechanism in line with RSPO requirements, and that unresolved land conflicts preclude a positive NPP verification.

9.4. IMPARTIALITY AND CONFLICT OF INTEREST – NPP

- a) Where assessors involved in SEIA, HCV or other NPP-related studies are part of the CB's network, the certifier shall verify and document that no conflict of interest exists.
- b) Assessors who developed NPP assessments or management plans shall not participate in the verification of the same NPP process.

9.5. REVIEW OF NON CONFORMITIES

9.5.1. REVIEW OF P&C NONCONFORMITIES

- a) Major NCs raised during surveillance audits and recertification audits are closed within 90 days by the certifier.
- b) Minor NCs raised has a deadline of 12 months from the closing meeting. If not addressed by the subsequent audit, auditor raises minor NCs as major ones.
- c) A critical non-conformity corresponds to a major non-conformity linked to a Principle. A minor non-conformity is considered non-critical. Minor non-conformities that are not closed by the next audit are escalated to major non-conformities.
- d) If there are more than 5 critical non-conformities initially during surveillance or recertification; immediate suspension.
- e) The repetition of the same critical NC under the same Principle in successive audits shall result in immediate suspension.

9.5.2. REVIEW OF ISH NONCONFORMITIES

- a) All deviations are considered major NCs in RPSO ISH.
- b) For Eligibility phase, the NCs are closed at least 12 months of the audit. If not, CU Services denies the eligibility certificate and a full re-audit is required.
- c) For MS A, NCs are closed at least one month before the expiration of the eligibility certificate. If not, CU Services denies MS A audit and a full re-audit is required. No extensions are allowed in this phase.
- d) For initial MS B, NCs are closed at least two months prior to the expiration of MS A certificate. If not, CU Services denies MS B initial audit and a full re-audit is required.
- e) For annual surveillance audits, NCs are closed within 90 days of the closing meeting. If not, certificate is suspended.

9.6. PEER REVIEW PROCESS

- a) For initial and recertification audits for RSPO P&C and Eligibility, MSA and MSB initial and recertification for ISH, CU Services submits the final audit report approved to the peer reviewer for review.
- b) CU Services monitors that peer reviewer their results on the review not more than two calendar weeks of the date that they receive the report from the certifier.
- c) If peer reviewer has comments or observations in the report, then CU Services needs to adjust information or give justification until the audit report is approved by the peer reviewer. All peer reviewer observations shall be resolved and accepted before the certification decision is taken.
- d) Certification decision shall not be granted while peer reviewer observations remain open or unresolved.

9.7. CERTIFICATION DECISION IN THE RSPO PLATAFORM

- a) All certification decisions, licence requests, updates, suspensions, withdrawals and related actions are recorded and processed exclusively through the RSPO IT Platform (PRISMA), in accordance with RSPO system requirements and applicable user guidance.
- b) Once certification decision is granted, CU Services needs to require the license in the RSPO IT PLATFORM.
- c) Before applying for or issuing an RSPO license in PRISMA, CU Services must verify whether the certified Management Unit has an active Improvement and Mitigation Unit (IMU). When an IMU is identified, the certifier must: verify the IMU's status in PRISMA; and confirm whether the IMU's conditions allow for licensing in accordance with RSPO requirements. An RSPO license will not be applied for or issued if the IMU's conditions preclude certification approval.

9.8. SUSPENSION OF CERTIFICATE

- a) If certified projects cannot close major NCs within the deadline given, CU Services suspends the certificate.
- b) The client needs to solve the NCs after suspension to avoid CU Services to withdraw the certificate. CU Services determines the maximum time of suspension but not more than 6 months from the last audit day. For recertification, suspension cannot last more than the validity of the licence. For ISH, a request for time extension of p to a maximum of three months may be approved by RSPO.
- c) If a certified project has a major NC on the same indicator in successive audits, CU Services suspends the certificate immediately.
- d) CU Services suspends certification if five or more major NCs are detected within a principle in an annual surveillance audit or recertification audit not considering ncs raised on the supply chain indicators.
- e) If certificate is suspended due to failure of closing NCs, client has no more than 6 months from the last audit date to lift suspension. If not, CU Services withdraws certificate.
- f) Certificate can also be suspended or withdrawn by an RSPO request.
- g) CU Services communicates suspension to client within five working days after the end of closing meeting and updates the certification status in RSPO IT Platform.

9.9. WITHDRAWAL AND TERMINATION OF CERTIFICATION

- a) If an operator is suspended and no actions are taken or are not enough to lift suspension, then certificate is withdrawn by CU Services.
- b) For ISH, during MS A, operator has 1 month before expiration of the eligibility certificate to address the major non-conformity. If not, CU Services withdraws certificate and reaudit will be required.
- c) For ISH, during MS B initial audit, if major NC is not addressed at least two months prior to the expiry of the MSA certificate, CU Services withdraws certificate and a reaudit will be required.
- d) Certifier communicates decision of withdrawal of certificate sending a letter to the client.
- e) Also certifiers update the status of certification history in RSPO IT platform.

9.10. USE OF RSPO TRADEMARKS

- a) During the audits, CU Services will evaluate any use of RSPO trademarks and claims as stated in the RSPO Rules of Market and Communications and Claims.
- b) Trademarks and claims can only be used after certification decision is granted.
- c) Certified operation can only use trademarks, logos or claims in conformity with the RSPO Rules of Market and Communications and Claims.
- d) Any unauthorized or misleading use may lead to nonconformity. This requirement is not applicable for the RSPO ISH standard.
- e) Control Union Services does not approve artwork, packaging designs or trademark applications. Responsibility for ensuring correct use of RSPO trademarks and claims, including prior approval when required, rests solely with the certified organization in accordance with RSPO Rules of Market Communications and Claims.
- f) The current version of the RSPO Rules on Communication and Claims is publicly available on the RSPO website and must be consulted by the organization prior to any use.
- g) Failure to comply with RSPO trademark rules may also result in penalties imposed directly by the RSPO.
- h) Any questions related to trademark approval processes must be directed directly to the RSPO or managed through the corresponding RSPO platforms.

9.11. PUBLIC INFORMATION

- a) As part of the requirements from RSPO, CUServices makes de following documents available to the public via CUServices website, also these documents are shared with RSPO for publication on the RSPO website: Audit report, certificate, CUServices complaints procedures, Directory of RSPO certified clients, public announcements, new planting procedure comments and new planting procedure report.

10. CHANGE CONTROL

Version and date	Description
Version 1.0; 31/12/2025	First version of the document.
Version 1.1; 15/03/2026	Modifications highlighted on grey.