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Forests

The RSPO's Rules on Deforestation, Legality and Traceability

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Introduction

The Roundtable on Sustainable Palm Oil (RSPO), established in 2004, is one of the world's best-known palm oil certification schemes.

The RSPO rules are intended to assure consumers that palm oil is sustainably produced, free from environmental and social harms. The RSPO's main standard, its Principles and Criteria (P&C), is updated every five years, with the latest version being adopted in late 2024 and set to take effect in November 2025.¹

Meanwhile, the EU Deforestation Regulation (EUDR) is due to come into effect at the end of 2025.² This new regulation will require companies to conduct due diligence to ensure that forest-risk commodities, including palm oil, sold or exported in the EU are produced legally and on land that has not been deforested after 31 December 2020.

The European Commission has outlined that certification schemes can help with compliance with the EUDR but do not replace due diligence and stakeholders should assess schemes' standards, implementation and credibility.³ This follows an impact study by the EU in 2021 concluding there are multiple issues with such schemes.⁴

In the UK, under Schedule 17 of the 2021 Environment Act, companies using certain commodities such as palm oil will also be required to ensure these are legally produced.⁵ Unlike in the EU there is no deforestation-free requirement. The UK has yet to bring in secondary regulation which will bring the legislation into effect and set out further details. The role that certification schemes will play under new UK legislation is unclear. However, UK Government policies and initiatives to date have largely relied on certification schemes to ensure palm oil is sustainably produced.⁶

Previous EIA investigations and analyses of RSPO standards, implementation and assurance processes in 2015,⁷ 2019⁸ and 2021⁹ concluded that non-adherence to the RSPO's standards is systemic and widespread and has led to ongoing land conflicts, labour abuses and destruction of forests.

The RSPO has continued to come in for criticism,¹⁰ including the long-documented practice of companies appointing and paying for their own auditors and drawing concerns that it creates an inherent conflict of interest.¹¹

In this briefing we examine the extent to which the RSPO standard ensures legality, traceability and deforestation-free palm oil. At first glance it may look as if the RSPO standard largely ensures palm oil is deforestation-free, legal and traceable. In reality, the system is complicated and many caveats and loopholes allow companies to bypass and bend the rules.

	EU Deforestation Regulation	UK Environment Act	RSPO alignment
Deforestation	Produced on land that has not been subject to deforestation after 31 December 2020.	N/A	The RSPO requires most forests to be conserved since November 2018. However, if a company does not do this, a deforested area can still become certified if certain procedures are followed. In addition, certified mills under the Mass Balance model (see below) are allowed to source from uncertified areas with deforestation.
Legality	Produced in accordance with the relevant legislation of the country of production, meaning the laws applicable in the country of production concerning the legal status of the area of production.	Relevant local laws to be complied with, meaning any law having effect in the country or territory where grown relating to: (a) ownership of the land (b) use of the land (c) otherwise relates to the land and specified in regulations made by the Secretary of State, if it relates to preventing forest being converted to agricultural use.	The RSPO requires all applicable and relevant legislation to be complied with; however, this can be leniently interpreted. RSPO members have been allowed to exclude part of their concessions with legal non-compliances from being certified despite them supplying their certified mill. Certified mills under the Mass Balance model can also source from uncertified suppliers. While direct suppliers are required to be legal, notably in terms of land use, indirect suppliers appear to only have to demonstrate progress towards legality, and other illegalities may be present.
Traceability	The geolocation of all plots of land where produced. For plots of land more than four hectares a polygon of the perimeter of the plot of land is required (polygon). For four hectares or less, at least one latitude and one longitude point is required.	N/A	The RSPO requires the mill to collect geolocations (a point coordinate if under four hectares or polygon coordinates if four hectares or more) for direct suppliers, but indirect suppliers only appear to have to demonstrate progress towards this level of traceability. RSPO member companies are required to submit polygons of all their concessions (certified and uncertified) to the RSPO, but this is a separate process to certification itself.

How the RSPO works

Companies that join the RSPO as members are required to comply with its rules. The rules a company complies with are dependent on what type of organisation it is.¹²

Those that cultivate oil palm – known as “growers” in the RSPO system – follow the RSPO’s Principles and Criteria (P&C). Growers are audited by third-party certification bodies against the RSPO P&C for their operations to become certified.

Certification is granted to a grower’s mill and its associated supply base, known as the Unit of Certification (UoC). The associated supply base to be certified includes the palm oil plantations directly managed by the mill and its scheme smallholders and outgrowers (farmers who are exclusively contracted to that mill).¹³

The RSPO certifies mills under two models:

- **Identity Preserved (IP):** a mill which only sources from certified areas
- **Mass Balance (MB):** a mill which sources from certified and uncertified areas. It can only claim the volume of palm oil produced from certified sources as RSPO certified.

The mass balance model

As a Mass Balance-certified mill can source from uncertified areas, there are different rules depending on what type of area it is sourcing from, creating a confusingly tiered system:

- 1. certified areas:** comply with the P&C
- 2. uncertified areas managed by RSPO members:** comply with the minimum requirements for multiple management units (previously known as the partial certification requirements)¹⁴
- 3. uncertified areas managed by non-RSPO members (also known as fresh fruit bunches, or FFB, suppliers):** comply with far fewer rules and is further split into:
 - **directly sourced:** typically oil palm FFB obtained directly from a smallholder/farmer or another concession company
 - **indirectly sourced:** typically oil palm FFB obtained from collection centres, agents or other intermediaries.

Recognising that the Mass Balance model taints the credibility of the RSPO, RSPO members in 2021 adopted a resolution calling for the organisation to enhance the system.¹⁵

The European Commission has outlined that Mass Balance systems are not allowed under the EUDR because they allow for the mixing of unknown origin and non-deforestation-free commodities.¹⁶



No Deforestation

What are the RSPO's rules on deforestation?

Deforestation	RSPO certified mill		
	Identity Preserved		
	Mass Balance		
	RSPO certified areas	Uncertified areas owned by RSPO members	Uncertified areas managed by non-RSPO members
Rules	<ul style="list-style-type: none"> No clearing of primary forests and High Conservation Areas (HCV) areas since November 2005 and of High Carbon Stock (HCS) forests since November 2018. Companies are required to carry out assessments to identify the relevant areas to conserve prior to any new planting. If land clearing without assessments undertaken, required to go through the RSPO's Remediation and Compensation Procedure (RaCP).¹⁷ (P&C Criterion 7.7) 	Essentially the same as certified areas. ¹⁸	No requirements
How implemented	Assessments have to be submitted to the RSPO as part of its New Planting Procedure (NPP). If clearing without assessments has occurred in breach of the rules, an area can only be certified once approved through the RaCP. Companies are audited against these requirements as part of the P&C.	Assessments submitted as part of NPP. As part of any P&C audit, the auditor assesses if all other uncertified concessions managed by the company have complied with the rules.	N/A

Loopholes and failures in the RSPO system

Deforestation can occur in the RSPO system as:

- companies are allowed to clear forests if they are not identified as primary forests, HCV areas or HCS forests
- companies can acquire new concessions that have deforested and compensate for deforestation undertaken in breach of the rules
- companies can deforest and then join the RSPO and compensate for deforestation undertaken in breach of the rules
- there is a separate procedure for areas in High Forest Cover Landscapes (HFCLs) within High Forest Cover Countries (HFCCs), which has still not been defined, despite being introduced in the 2018 standard
- areas owned by RSPO member that have been deforested can be excluded from being certified despite being part of the certified mill's associated supply base²⁶
- companies have failed to conduct the relevant assessments or conducted poor quality assessments – particularly an issue in the past, ahead of land clearing to identify areas that should not be cleared²⁷
- certified mills sourcing from uncertified suppliers that can have undertaken deforestation

Does the RSPO ensure no deforestation?

Certified areas can have been deforested. Although RSPO members may be compensating for the areas deforested, forest loss has still occurred. There is no requirement for external uncertified suppliers supplying Mass Balance certified mills to be deforestation-free.

A study in 2020 found that around 75 per cent of RSPO member concessions have already been deforested in the past and there was little remaining forest left in RSPO member concessions that could still be deforested,²⁸ suggesting there is little forest still left to lose in RSPO members' concessions.

Definitions

High Conservation Value (HCV) Areas: areas necessary to maintain or enhance one or more of the six High Conservation Values (HCVs) as defined by the HCV Network.²³ These areas conserve one or more of the following:

1. HCV 1 – species diversity
2. HCV 2 – landscape-level ecosystems, ecosystem mosaics and Intact Forest Landscapes
3. HCV 3 – ecosystems and habitats
4. HCV 4 – ecosystem services
5. HCV 5 – community needs
6. HCV 6 – cultural values

High Carbon Stock (HCS) forests: those forests where the carbon stocks above and below ground that could be lost are greater than the carbon stocks that could be gained over one planting cycle (i.e. for oil palm this is typically c. 25 years).

The definition now used by the RSPO deviates from the previous P&C which instead aligned with the internationally recognised High Carbon Stock Approach (HCSA) that classifies forests to be protected based on their vegetation structure.²⁴ This is perceived to weaken the RSPO standard.²⁵



The Remediation and Compensation Procedure (RaCP)

The RaCP was adopted by the RSPO in 2015, acknowledging that land clearance may have taken place without first doing an HCV assessment in breach of the RSPO's rules. This may have been due to mistakes, poor procedures or the activities of previous owners. Rather than just expel members or stop concessions from becoming certified, the RSPO decided that allowing members to remediate and compensate for the loss of areas that should not have been cleared was better.¹⁹

The RaCP calculates the area to be compensated based on when the clearing took place and the type of vegetation cleared. The remediation and compensation can involve anything from having to restore areas to planting trees off-site elsewhere or providing financial support to a protected area.

An independent review of the RaCP in 2020, commissioned by the RSPO, found a much greater degree of non-compliant land clearing than expected (more than one million hectares). It also found for 98 per cent of RaCP cases there was no evidence of remediation and compensation measures yet being implemented on the ground.²⁰

There has been strong criticism of the RaCP still being allowed into the 2024 P&C standard.²¹

As of March 2025, 129 of the 165 grower members (78%) were being required to submit concept notes under the RaCP – meaning over three quarters of members have not complied with the RSPO's rules relating to land clearing.²²

Legality

What are the RSPO's rules on legality?

Legality	RSPO certified mill		
	Identity preserved		
	Mass balance		
	RSPO certified areas	Uncertified areas managed by RSPO members	Uncertified areas managed by non-RSPO members
Rules	Comply with all applicable and relevant legal requirements, including ratified international laws and regulations (P&C Criterion 2.1)	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1.	<ul style="list-style-type: none">• Evidence of the legal status of the land, including tenure and user rights, is required from suppliers (P&C Criterion 2.3)• Contractors, which can include those supplying FFB, required to comply with applicable and relevant legal requirements (P&C Criterion 2.2)
How implemented	The RSPO's National Interpretations set out the relevant legal requirement for each country for auditors to follow as part of P&C audit. ²⁹	Companies conduct internal audits, or similar, on whether all their uncertified concessions are legal – this is assessed by the certification body as part of any P&C audit.	The RSPO mill seeking certification obtains documentation from FFB suppliers, such as proof of the ownership status or the right/claim to the land. All contracts drawn up require contractors to meet and demonstrate they are legal.

Loopholes and failures in the RSPO system

Illegalities can occur in the RSPO system as:

- the RSPO is voluntary and has explicitly stated its standards are voluntary and **“do not extend to enforcing or confirming the legal standing of a company's use of land (which is a mandate only held by the national authority)”**.³⁰
- part of a RSPO members' concession that has legal non-compliance can be excluded from being certified despite being part of a certified mill's associated supply base
- the legality of RSPO members' uncertified concessions is less rigorously assessed by certification bodies as part of the requirements for uncertified management units and any legal non-compliances only have to be addressed³¹
- while evidence is required on the legal status of the land from suppliers, for indirectly sourced FFB only progress towards legality appears to be required, meaning not all land sourced from may be legal
- the legality requirements for uncertified areas supplying to a certified mill are not as comprehensive, nor as rigorously assessed, and other legal non-compliances may be present.

Does the RSPO ensure legality?

A certified mill under the Mass Balance system can be sourcing from uncertified areas that may not be fully legal, including both its own plantations and from external plantations. Legal compliance can also be less rigorously assessed and adhered to, especially if legal non-compliances are widespread.

A report in 2021 by Greenpeace found 100 RSPO members were operating in the forest estate in Indonesia in violation of the law.³² Equally, many Indonesian palm oil companies, including RSPO members, do not have HGU or 'right to cultivate' permits for all or parts of their concession areas, again violating the law (see box on HGU).

In addition, the RSPO's implementation of international human rights standards, such as Free, Prior and Informed Consent (FPIC), is perceived to have been weak and unable to resolve conflicts.³³



Right to Cultivate (Hak Guna Usaha – HGU) permits in the RSPO

The Right to Cultivate (HGU) is the final permit a palm oil company in Indonesia must obtain to be considered legal.

Previously, companies in Indonesia had been allowed to have either a Plantation Business Permit (IUP) and/or HGU permit. In 2016, Indonesia's Constitutional Court clarified that Law No. 39 of 2014 on Plantations required companies to have both a IUP and HGU permit.

Many companies in Indonesia have not yet obtained their HGU permits, either in full or part. As of 2024, the Indonesian Government stated it has identified 537 palm oil companies operating on 2.5 million hectares of land without an HGU.³⁴ Companies operating without an HGU must pay a fine and

then may be issued with a HGU permit, with the Government actively seeking to resolve this.³⁵

The RSPO's rules on HGU permits have been liberal at best:³⁶

- companies that were certified before June 2018 permitted not to have a HGU permit
- companies certified after June 2018 required to have IUP and HGU permits. However, if part of the concession area does not have a HGU permit, that part can be excluded from being certified
- uncertified RSPO member concessions are not required to have HGU permit, only that they are in the process of acquiring it.

Traceability

What are the RSPO's rules on traceability?

Traceability	RSPO certified mill		
	Identity preserved		
	Mass balance		
	RSPO certified areas	Uncertified areas managed by RSPO members	Uncertified areas managed by non-RSPO members
Rules	<ul style="list-style-type: none">Required to obtain documentation on the geolocation of its suppliers – defined as a point location for under four hectares and a polygon for four hectares or more (P&C Criterion 2.3)Separately from the P&C, through RSPO Resolution 6g in 2013, the RSPO requires member companies to submit boundaries in polygon format of all their concessions (certified and uncertified).³⁷	<ul style="list-style-type: none">Required to obtain documentation on the geolocation of its suppliers – defined as a point location for under four hectares and a polygon for four hectares or more (P&C Criterion 2.3)Separately from the P&C, the RSPO requires member companies to submit the boundaries in polygon format of all their concessions (certified and uncertified).	Required to obtain documentation on the geolocation of its suppliers – defined as a point location for under four hectares and a polygon for four hectares or more (P&C Criterion 2.3)
How implemented	<ul style="list-style-type: none">The mill obtains the geolocations of its suppliers as part of the P&C audit process.Every year through the Annual Communication of Progress (ACOP) the RSPO asks member to submit shapefiles of their concessions and declare this represents 100 per cent of their concessions. These are also shown on the GeoRSPO map.³⁸	<ul style="list-style-type: none">The mill obtains the geolocations of its suppliers.Every year through the Annual Communication of Progress (ACOP) the RSPO asks member to submit shapefiles of their concessions and declare this represents 100 per cent of their concessions. These are also shown on the GeoRSPO map.	The mill obtains the geolocations of its suppliers.

Loopholes and failures in the RSPO system

A lack of traceability can occur in the RSPO system as:

- while direct suppliers of four hectares or more in size are now required to have polygons that describe the boundary of the area, indirect suppliers appear only to be required to demonstrate progress towards this level of traceability, meaning full traceability can remain lacking
- companies self-declare their concession areas to the RSPO annually through the ACOP and any changes to these areas, which may risk them not always being declared or up to date
- it is unclear if the P&C require the submission of polygons for certified areas – including the company's own concession and its smallholders.³⁹ While RSPO members submit their concession boundaries in polygon format as part of other processes, it is unclear how these will now be assessed and verified by a certification body.⁴⁰

The RSPO's *prisma* (Palm Resource Information and Sustainability Management) system

The RSPO has recently launched the new *prisma* system that is intended to improve traceability and sustainability.⁴¹ *Prisma* replaces the RSPO's previous PalmTrace system, including integrating certification and licensing information, and is only accessible to RSPO members and certification bodies.

As part of the *prisma* roll-out, the RSPO has invited member companies to review and resubmit shapefiles of their supply bases – including their directly managed land, scheme smallholders and outgrowers – to ensure seamless audit processes that will commence as of June 2025.⁴² It is expected that at least supply base IDs from *prisma* will be

pulled into the audit report. Previously, audit reports have contained maps and a point coordinate for each part of the supply base.

However, this resubmission to *prisma* appears to be a voluntary process and it is unclear how auditors will verify the information submitted to the *prisma* system and whether geolocation information on direct and indirect suppliers will also be integrated into the *prisma* system at some point.⁴³

Therefore it remains to be seen how well the *prisma* system will work and how concession boundaries submitted will be assessed by certification bodies as part of the audit process.

Does the RSPO ensure traceability?

While the RSPO now requires polygons for directly sourced FFB coming from areas of four hectares or more, such traceability for indirectly sourced FFB appears only to be needed to be worked towards, making full traceability still lacking.

RSPO member companies are required to submit their concessions boundaries in polygon format to the RSPO through various processes, but it is unclear how these will be audited as part of the P&C certification process.

The new *prisma* system is meant to improve traceability, but it remains to be seen how it will work in practice.

Conclusion

Our assessment shows that the RSPO standards and the implementation of them still have loopholes and weaknesses that mean they cannot guarantee full compliance in relation to the EU Deforestation Regulation, and any forthcoming UK legislation, for deforestation, legality and traceability. The RSPO's standard still allows for forest loss to be compensated for and for legal non-compliances to exist. While there have been some advances on traceability, it remains to be seen whether this will be translated into effective implementation, an area where the RSPO does not have a strong track record.

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39. A request was sent to the RSPO to seek clarification on the new traceability requirements in the P&C 2024 but no response was received. Previously Criterion 2.3.1 has been in relation to suppliers outside the Unit of Certification.
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41. RSPO, December 2024, Transition Period from PalmTrace to prisma <https://rspo.org/transition-period-from-palmtrace-to-prisma/>
42. RSPO, 9 January 2025, Resubmission of Disclosure by all RSPO P&C Growers and Scheme Smallholders in prisma <https://rspo.org/resubmission-of-disclosure-by-all-rspo-pc-growers/>
43. RSPO, November 2024, RSPO Reiterates FPIC and Components to Address Deforestation Remain Key Criteria in 2024 RSPO Standards <https://rspo.org/rspo-reiterates-fpic-and-components-to-address-deforestation-remain-key-criteria-in-2024-rspo-standards/>; Tropical Forest Alliance and Preferred by Nature, Assessing Traceability, Monitoring and Sustainability Initiatives in Key Soft Commodities: Mapping, Categorization, and Recommendations focusing on EUDR Compliance, May 2024 https://www.visec.com.ar/wp-content/uploads/2024/08/TFA-Assessing-Traceability-Monitoring-and-Sustainability-Initiatives-in-Key-Soft-Commodities_Final-Report.pdf