

Open Letter to the Roundtable on Sustainable Palm Oil (RSPO)

Joint Letter from RSPO Members on the RSPO Complaints Process, following the Panel's Decision letter on PT PP London Sumatra Indonesia Tbk.

30 November 2018

RSPO Secretariat

Unit A-37-1, Level 37, Tower A, Menara UOA
Bangsar No.5 Jalan Bangsar Utama 1,
59000 Kuala Lumpur Malaysia

Dear Datuk Darrel Webber,

We are writing concerning the RSPO Complaints System, and by way of example would draw special attention to the RSPO Complaint Panel's decision letter dated 2 November 2018 on the case involving PT PP London Sumatra (LonSum) Indonesia Tbk ("**Decision Letter**").

As RSPO members, we value the establishment and management of the Complaints System by the RSPO Secretariat as a fundamental mechanism to ensure all members hold the Principles and Criteria in the highest regard. We remain committed to the process, however, see the need for the Complaints System to be improved, providing clarity and ensuring transparency of cases moving forward.

RSPO members rely on the third-party investigation and verification mechanism, and require the timely management of cases, with clear time-bound milestones communicated via the public dashboard for accountability and understanding of progress. Should there be delays in the process, we call on the RSPO to promptly and transparently communicate these details as well. With the strengthening of the complaints procedure in 2017, we do believe effort has been made. However, we call for stronger communication and greater detail to be made publicly available, except where anonymity is strictly necessary.

Following the recent publication of the decision letter on PT LonSum, we see the need for the grievance process to be improved, based notably on the specific action points described below, and to providing clarity and transparency moving forward.

As concerned stakeholders in this process, we call upon the RSPO to promptly set up and communicate a clear and transparent approach to manage any remediation process. Such an approach should include the following points:

1. Any action towards resolution of the complaint shall be handled with full transparency and impartiality and conducted by a party free from conflict of interest, including but not limited to the certification bodies involved.
2. The RSPO should communicate publicly and ensure the accomplishment of the following specific milestones:
 - a) Complaints Respondents shall publish an action plan based on decisions by the Complaints Panel. For LonSum, they shall publish an action plan to perform the corrective actions in the Decision Letter within 30 days, or by December 1, 2018, at 12:00 AM EST ("**Action Plan**");
 - b) The relevant Certification Body ("**CBs**") shall issue a Surveillance Audit report as a three-month milestone. For LonSum, this would be, by February 1, 2019; and
 - c) Accreditation Services International (ASI) shall provide a Compliance Audit report on the CBs as a six-month milestone. For LonSum, this would be, by May 1, 2019.

3. The RSPO should publish Lonsum’s quarterly updates on progress on implementation of the corrective actions as well as a summary of the findings of the CB reports against the Action Plan and of the ASI report on the CB reports.
4. We understand that the RSPO has established an Implementation and Monitoring Unit (IMU), which has the mandate to monitor and verify the implementation of any Action Plan endorsed by the Complaints Panel. The IMU should demonstrate how it would operate in the above case, in particular how it would work with relevant stakeholders, including the complainants, to accurately and objectively assess whether all critical milestones have been successfully achieved and transparently report all progress made and challenges faced in the process.
5. The RSPO should ensure and promote greater transparency around all complaints, including the Lonsum case given its urgency.

We believe the above will facilitate a clear and transparent process in which members succeed in addressing stakeholders’ concerns.

Thank you.

Yours Sincerely,

	
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