European First Importer Survey

2017 Palm Oil Industry Scorecard

A report for:

Retail Palm Oil Transparency Coalition

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Executive Summary

Palm oil and ingredients derived from palm oil are used in a wide range of food and non-food products sold by most retailers (e.g. cakes, biscuits, bread, soaps, bleach). Growth in demand for both food and non-food applications have led to significant production growth and land requirements, contributing to an increasing rate of deforestation, particularly in South East Asia. In response to the growing deforestation challenge, the Consumer Goods Forum (CGF) called on businesses to adopt commitments ensuring that their supply chains would achieve zero deforestation by 2020 for all commodities, including palm oil.

Retailers are the public face of a long and complicated palm supply chain. Although they have little direct influence over the primary production practices of suppliers four or five tiers beyond their contracted suppliers, they occupy a unique role in understanding and responding to customer preferences. The Retail Palm Oil Transparency Coalition (RPOTC) is formed of companies working together to remove deforestation and exploitation from palm oil supply chains. It aims to achieve this by:

- Achieving greater transparency of the progress their supply chains are making towards zero deforestation and exploitation in palm oil production.
- Enabling individual retailers and product suppliers/manufacturers to make more informed sourcing/purchasing decisions.
- Driving faster progress towards the supply of zero deforestation palm oil for UK/European markets and helping the same globally through the take up of this or similar models.

This is the first RPOTC report reflecting the findings from its annual survey of the top ten 'first importers' of palm oil to Europe and North America. Importers were selected on the basis of the ranking of the highest volume suppliers to individual RPOTC member and were then prioritised by those that were most commonly identified by the group.

As a result of the 2017 survey, the following key findings have been identified:

- Commitments and approaches to achieving zero deforestation amongst growers, manufacturers, traders, and importers are rapidly evolving.
- There are significant differences in the progress importers are making towards achieving zero deforestation and exploitation free supply chains.
- ProForest and The Forest Trust (TFT) are the primary partners relied upon for traceability and risk management programmes of the surveyed companies.
- Use of risk-based supply chain monitoring means that deforestation-free palm oil cannot currently be assured for retailers.
- Exploitation is not being proactively managed in third party plantations or supply chains by the majority of companies assessed.
- Third party verification of importer commitments is limited to traceability claims only and therefore do not cover broader policy areas (e.g. exploitation, peatland planting).
- Case studies showcasing zero deforestation progress are often limited to own company plantations / communities and therefore exclude third party supply.

In general, importers stated that they believe RSPO certified palm oil remains the most effective way to limit the risk of deforestation within retail supply chains.

Contents

1. Introduction

The Retail Palm Oil Transparency Coalition (RPOTC) is formed of European retail companies working together to remove deforestation and exploitation from their palm oil supply chains in a non-competitive forum. In 2015, the RPOTC recognised the need to understand how their supply chains were progressing towards these aims. After completing individual mapping projects to understand where palm oil was being used in their supply chains, and who was indirectly supplying it, RPOTC members elected to focus on the 'first importers' of palm oil to Europe. These importers often fill several roles in palm production and supply – from growing to ingredient manufacturing to trading.

This document provides a summary of the cross-cutting themes and findings from the latest assessment. It is structured to clearly identify how the ten importers assessed compare to one another across four themes:

- **Ambition** – Importer commitments and targets to sourcing and supplying certified responsibly sourced palm oil to Europe and the world.
- **Targets** – Plans and timelines to achieve the specific commitments importers have set for themselves and the governance structure supporting their implementation.
- **Progress** – Performance to date in achieving and verifying that their policies are being implemented.
- **Verification** – Steps being taken to provide confidence in the progress reported by the business. This includes increasing transparency, traceability, and engaging third parties to validate that policies are aligned with practices on the ground.

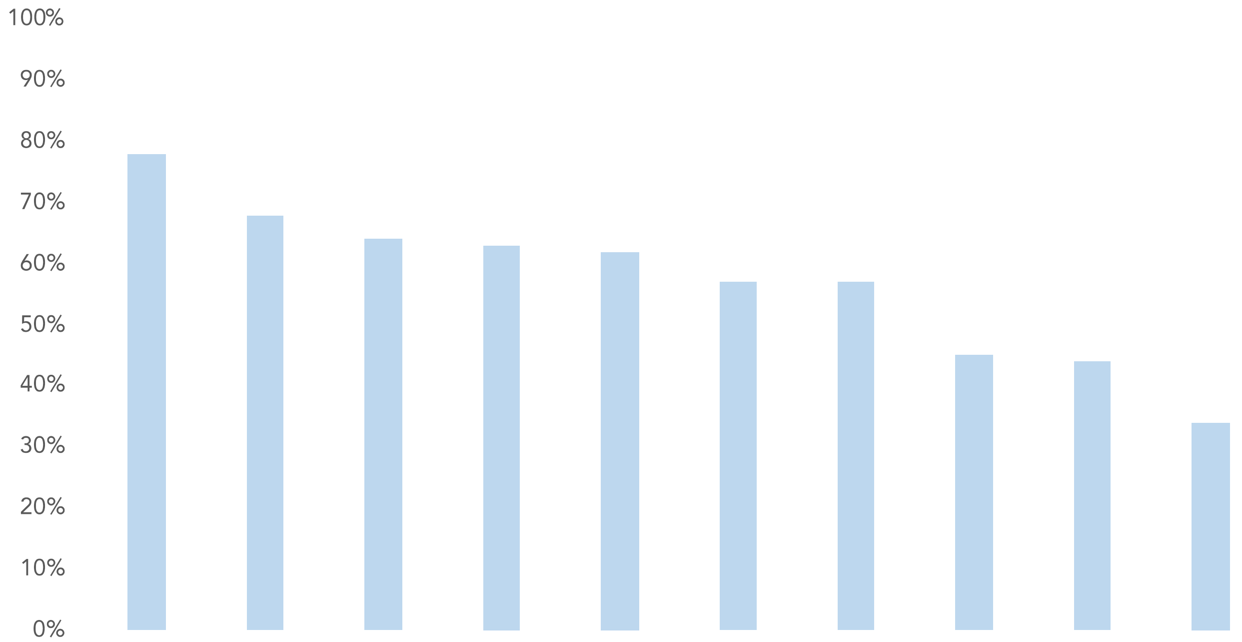
The importers have been anonymised for the purpose of this document. Further details and supplementary materials to align to individual company performance expectations vs company responses via a scorecard are available to RPOTC Members and Affiliates.

It is important to stress from the outset that the retailers commissioning this work understand the significant potential of the palm oil industry in terms of contributing to sustainable development outcomes (e.g. livelihoods and poverty alleviation, agricultural efficiency in terms of land requirements for meeting future global demand for vegetable oil). Ultimately, this research aims to both recognise current leadership and highlight key areas for improvement in order to incentivise faster progress towards the development of a sustainable palm oil industry.

2. Key Themes and Findings

The 2017 first importer survey identified several consistent themes across the companies surveyed that may help inform future engagement and areas for further work to take place. These findings are based on the collective review of responses and provide a general overview of importer progress towards zero deforestation. Individual company actions may contradict some of the conclusions provided.

There are significant differences between importer progress towards zero deforestation and exploitation free palm production.
All responses have been entered into a scorecard to indicate the degree to which companies are responding to the various issues addressed by the survey. RPOTC Members and Affiliates are able to use these scorecards to create bespoke reports based on their individual expectations. In the absence of any subjective weighting, it is clear that some companies are doing more to actively progress transparency and performance.



% of responses indicating progress towards zero deforestation and exploitation free supply chains

Commitments and approaches to achieving zero deforestation are rapidly evolving.
There has been significant progress in commitments and approaches to committing to zero deforestation within all the surveyed companies. Policies, programmes, risk assessments, and transparency data are all developing in line with customer and governmental expectations. The most significant advancements over the last two years have focused on: (1) setting clear and transparent commitments; (2) increasing traceability of supply; and (3) assessing smallholder support opportunities. These areas of focus have returned little evidence to date of progress towards the CGF defined zero deforestation ambition, however it has indicated that the companies assessed are now aware and capable of deploying tested solutions.

ProForest and The Forest Trust (TFT) are relied upon for traceability and risk management.
Seven of ten importers are relying on one, or both, organisations to conduct risk assessment surveys using the industry standard 50km mill radius for determining deforestation potential in their supply chain. ProForest and TFT are respected organisations that utilise satellite imagery to assess deforestation potential to a fair degree. The use of the same organisations means that the same approaches, data, and interpretations are being undertaken for virtually all imported palm oil supply where the mill or plantation location is known.

Use of risk-based supply chain monitoring means that deforestation-free palm oil cannot be assured.
All importers surveyed have supplier policies in place that align to their zero deforestation commitments. To monitor an uncertified supply, most importers utilise a risk-based process for monitoring compliance of third party suppliers with these requirements that depend on a deforestation indicator being raised to prioritise where supplier engagements or ground assessments are needed. Risk-based approaches reduce the likelihood of an issue such as deforestation or exploitation occurring in a supply chain, but they do not exclude it. Segregated certified palm oil remains the closest to an absolute guarantee of deforestation-free product.

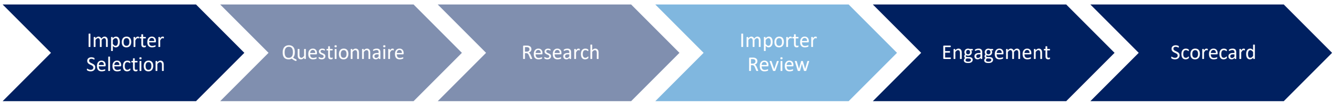
Exploitation is not being proactively managed in third party plantations or supply chains.
Most importers are using a deforestation-based indicator to lead to monitoring exploitation on the ground (i.e. assessing labour policy adherence when there is a risk of deforestation). A grievance process is in place for most companies should a complaint be made. One company, however, has a proactive system in place to monitor ground conditions and media reports of potential exploitation issues around known plantations.

Verification of importer commitments is limited to traceability only.
Six of the ten importers utilise a third party – typically ProForest or TFT – to verify the traceability data for their respective supply chains. Few of the companies reviewed stated that a third-party reviews their progress towards their zero deforestation commitments or corporate reports containing qualitative updates towards them; one has stated they plan to do this in the future.

Case studies showcasing zero deforestation progress are limited to own company plantations / communities.
Every importer assessed has a positive case study or story to demonstrate how they are engaging with plantations to improve their practices. These vary from direct financial support to providing human resource for capacity building. In almost all companies, regardless if own plantations make up 5% or 98% of palm oil supply, this work is often limited to the plantations that have a direct link to, or ownership by, the importer.

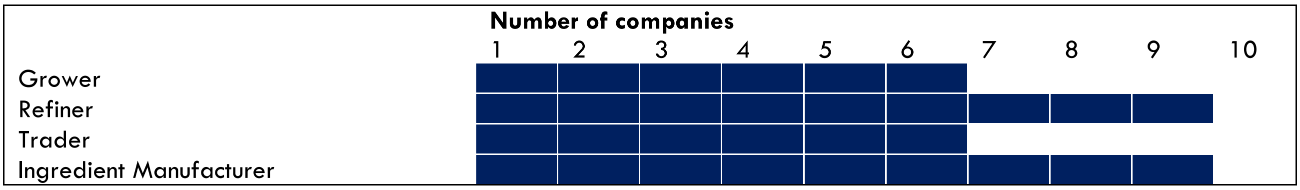
3. Approach

The 2017 scorecard adopted an approach that minimised the time and effort for retailers and importers to engage in the assessment process. This approach is summarised in the six steps below:



Step 1: Importer Identification

Each RPOTC member confidentially provided a list of the top palm oil importers they identified in their supply chain to 3Keel. All importers were then ranked in the order in which there was the most overlap between the retailer supply chains, with the top 10 being agreed for inclusion in the 2017 assessment:



Step 2: Questionnaire

3Keel reviewed and suggested modifications to the original questionnaire used by the RPOTC in the first review round in 2016. The following key changes were made:

- **Revised content** Questions were modified to reflect recent changes in RPOTC members' policies on deforestation and exploitation.
- **Revised format** Full questionnaire conversion from a single Excel tab to multiple tabs split by the focus areas of interest to the RPOTC: Ambition; Targets; Progress; and Verification. Additional background information and feedback requests were also added.
- **Fixed response options** All questions that may receive a scoring element had selectable options for what responses were allowed.
- **Evidence requests** Specific evidence required for justifications for how responses have been provided.
- **Extension to US supply** Data and commitment coverage of US imports included in addition to European supply.
- **Inclusion of positive scoring elements** Additional questions added on promoting high social and community practices (e.g. living wages).

All changes were presented to, reviewed, and agreed by RPOTC members.

Step 3: Research

Once the questions were agreed, 3Keel completed a desk-based review of publicly available information on each of the ten importers across four primary sources: (1) corporate reports; (2) company websites; (3) NGO and industry reports; and (4) Google key word searches. This review facilitated the pre-population of the importer questionnaire with expected responses given the availability of information. Evidence and/or justifications for any pre-populated responses were provided within the questionnaire for the importer to review and revise as appropriate.

Step 4: Importer Review

Each importer was given approximately 4 weeks to review, and add to, the pre-populated questionnaire with further information and evidence regarding their practices and progress towards achieving zero deforestation and exploitation commitments. During this time importers were encouraged to discuss the content, questions, or process with 3Keel prior to their submission.

Nine of the ten importers responded to the request for further information and/or reviewed the preliminary responses pre-populated in the questionnaire by 3Keel. Importers that were reluctant to engage with the RPOTC, or did not engage, were informed that their absence or lack of participation would result in the pre-populated responses being considered fair and representative of their progress. Whilst this clarification did persuade two initially reluctant firms to participate, one did not respond to any of 3Keel's attempts to engage.

Step 5: Engagement

Following the review and submission of the final questionnaire responses by the importer a direct face-to-face or teleconference was scheduled between the importer, a retailer representative on behalf of the RPOTC, and 3Keel. The purpose of these meetings was primarily to open a new channel for dialogue and engagement between the RPOTC and importers whilst seeking clarification and feedback on the primary areas of interest identified by 3Keel based on the questionnaire.

Step 6: Scorecard

Responses to the questionnaire were adjusted following importer engagements to reflect any changes or updates required considering new, or lack of, evidence supporting a relevant area. All data was then inserted into retailer-specific scorecards that provide a performance review based on the individual retailer's expectations of palm importer progress towards their commitments. Each retailer provides unique weighting and issue identification flags depending on what is important to their business. For example, one retailer may wish to flag wherever an importer has received an RSPO complaint against it whereas another may not be interested in monitoring the RSPO status of its suppliers.

The scorecard works by classifying questions and responses in accordance with retailer expectations:

Question Rating	Scoring Implication	Response Classification	Scoring Implication
Critical	If response is **below expectation**, area is flagged as an issue to address. Performance indicator changed to red.	Below Expectation	Reduced company score.
Compliant	Company receives points relevant to the level of response provided.	Meets Expectation	Equivalent points provided to response value.
Preferred	Performance indicator for area changed to blue in summary tab if company is otherwise compliant with all retailer requirements.	Exceeds Expectation	

The scorecard is available to RPOTC Members and Affiliates only.

4. Survey Results: Ambition

This section provides a review of how each company indicated its general ambition towards supporting zero deforestation and exploitation within the palm oil sector. Three areas are assessed:

1) **Certified Supply** – Commitments to source palm oil from sources that have achieved independent certification to RSPO and RSPO Next requirements.
2) **Environment** – Commitments align with recognised expectations for achieving zero deforestation and minimal negative impact.
3) **Exploitation** – Commitments to ensure plantations and supply chains operate fairly with workers and communities in accordance with international labour standards.

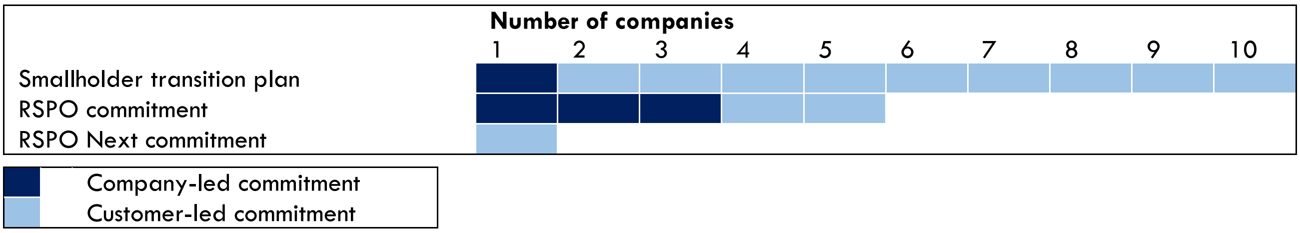
Certified Supply

Importers were asked whether they were committed to 100% sustainable palm oil/palm kernel oil for all the palm oil that they use. Mostly these commitments were advertised in palm oil policies. Some companies are committed to RSPO certification for their own plantations but not for all third-party suppliers. Third-party suppliers can instead align with the importers' proprietary standards.

Several importers indicated in the survey that they were committed to ensuring that the palm oil they used met the RSPO Next standard, usually providing links to zero deforestation policies as evidence but stating that they would not be pursuing supporting RSPO Next explicitly. One importer stated a direct commitment to RSPO Next for its own plantations. Another importer reported that they would audit and certify their operations against RSPO Next if there is a market demand, but would not do so unless this request was made of them. Many of the importers were undecided on the benefits of RSPO Next certification, raising issues of smallholder inclusion in the standard and the current lack of a certification mechanism.

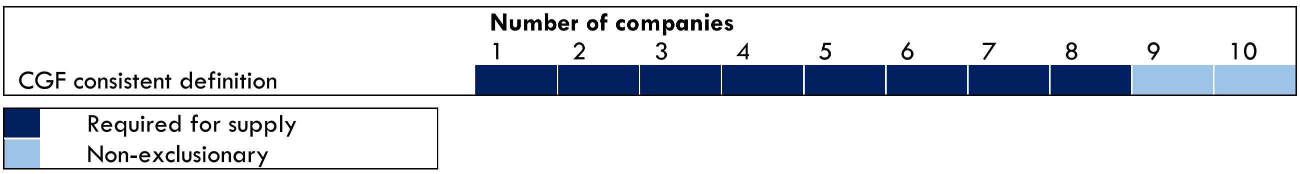
For action on smallholders, most importers referred to individual projects they were planning or that were on-going. Some of these were in their own plantations or supply chain, whilst others have stated their engagement or plans outside of their direct supply chain. Engagement with third party suppliers' smallholders was less common, though one company discussed a structured programme to ensure that all third-party smallholder suppliers are certified within three years in Indonesia.

Few importers reported dedicated smallholder support funds, with most referring to projects they were involved in that indirectly support them (e.g. providing capacity training). Where companies did have funds, the most common use cited by businesses in this area is paying for, or supporting, smallholders to achieve RSPO certification. For example, one company provides interest free credit to smallholders for farm inputs and covers all smallholder certification costs. Most companies did not disclose how much money was set up for these programmes and few provided evidence of strategic programme designs that would transform smallholder presence in third party supply chains.



Environment

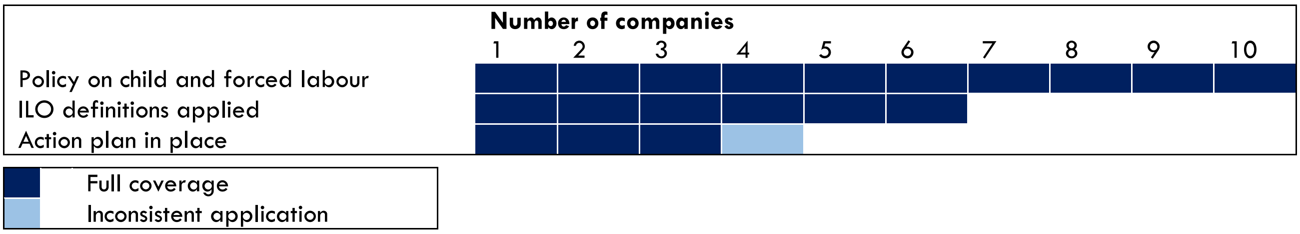
All importers define zero deforestation as covering no conversion of High Carbon Stock (HCS) forest or High Conservation Value (HCV) areas; no conversion of peatland; and undertaking Free Prior and Informed Consent (FPIC) prior to new plantings. All the zero deforestation policies were therefore consistent with the CGF definition of zero net deforestation.



Exploitation

All importers have polices on child and forced labour, though several of these policies lack definitions of the terms 'child' and 'forced' labour, or definitions provided were not consistent with the ILO definitions.

Three importers provided evidence for having proactive plans for minimising the risk of exploitation. One company has a commitment to implement a labour rights monitoring system, with the involvement of an external partner to verify labour conditions, compliance with labour policy requirements and improve welfare and working conditions. Two companies outline programmes and initiatives on human/labour rights in their sustainability reports.



5. Survey Results: Targets

This section provides a review of the targets each company set for themselves in achieving their own commitments. Two areas are assessed:

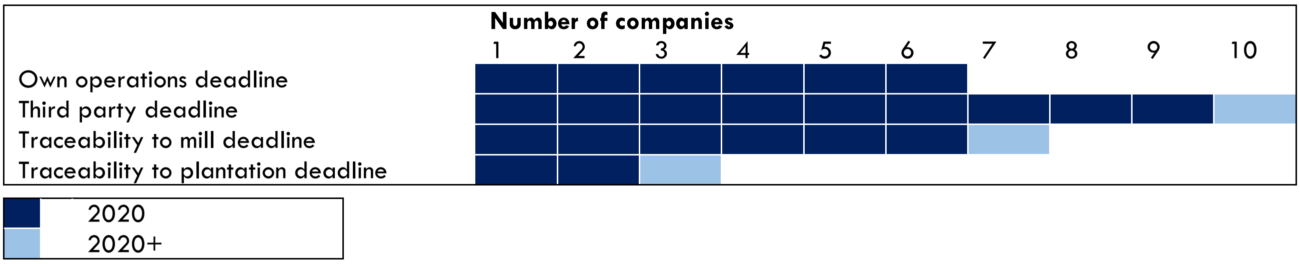
1) **Zero Deforestation and Traceability** – Timelines for achieving a transparent supply chain that conforms to company policies on achieving zero deforestation.
2) **Accountability** – Internal and external accountability structures for ensuring that commitments are realised.

Zero Deforestation and Traceability

The importers surveyed do not consistently provide a distinction between traceability and achieving zero deforestation goals. Although it is appreciated that traceability is a pre-requisite for promoting compliance with supplier and plantation policies when RSPO certified supply is not available, the distinction between demonstrating compliance with policies based on the availability of traceability data versus proactive monitoring, engaging or supporting producers was not always discussed or presented.

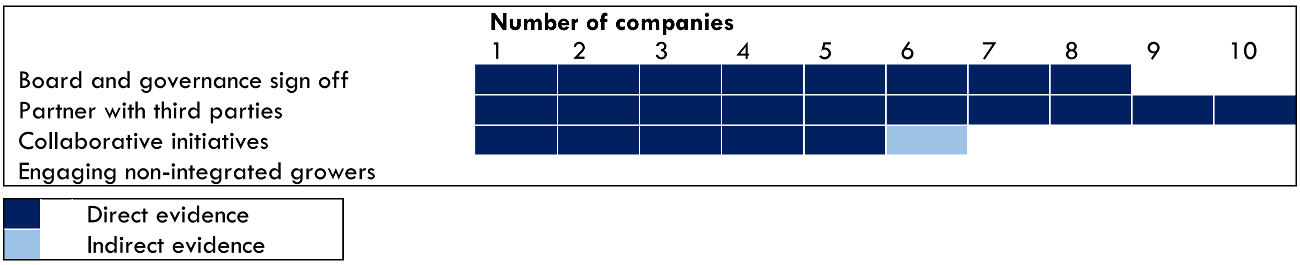
Several importers referred to their deforestation policies being effective immediately, but it was not made clear and no evidence was provided regarding the differences in company actions between requirements of suppliers before or after sunset dates have passed. For example, one company indicates that suppliers must have action plans in place to realise deforestation policies by a certain date, but there are no explicit deadlines for when specific targets must be achieved. No company indicated that a zero-tolerance policy was in place for suppliers that do not conform to their zero deforestation or exploitation commitments; these have also been noted to necessarily be desirable as they may result in displacement of a supplier to another supply chain rather than improvement.

Most importers are focusing on traceability to mill on the basis that a 50km circle around the mill would provide a sufficient measure of risk mitigation. It should be noted that this radius is based on the time needed to get fresh fruit bunches (FFB) from plantation to mill; this measure may not be relevant in every market as roads have improved in many regions enabling producers to transfer FFBs over greater distances within the 24 to 48-hour window.



Accountability

All importers have board governance and sign off for their sustainability policies with the exception of one. Externally, most importers work with third parties to achieve some or all their PO/PKO commitments, normally either The Forest Trust (TFT) or ProForest. These organisations work with the importers to map their supply chains to mill level and provide risk assessments of mills using geospatial mapping to look for evidence of deforestation.
Several importers are involved in collaborative initiatives. These include pre-competitive alliances with other importers, notably the Sustainable Palm Oil Manifesto (SPOM). However, the SPOM does not currently have the support or participation of any NGOs, and has been criticised for failing to meet new benchmarks for responsible palm oil production and trade[1]. Some companies are also part of the Fire Free Alliance (FFA).



[1] http://www.greenpeace.org/seasia/Press-Centre/Press-Releases/HCS-Briefer/

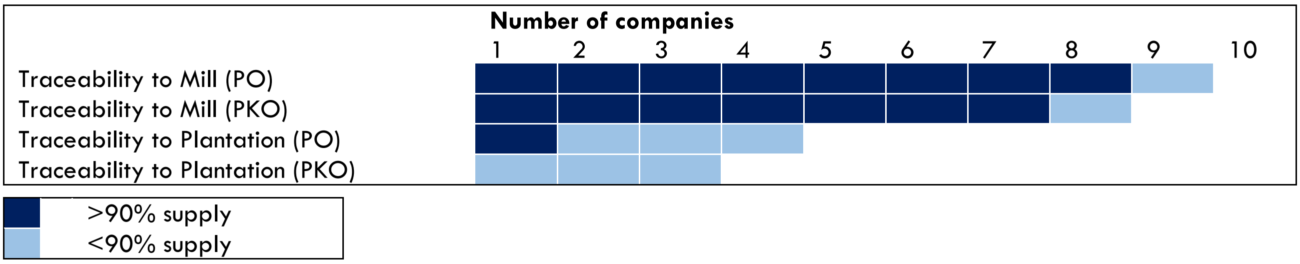
6. Survey Results: Progress

This section provides a review of how companies are measuring and disclosing progress towards their commitments. Three areas are assessed:

1) **Traceability** – Proportion of supply that is currently traceable to mill and plantation.
2) **Management Practices** – Use of grievance processes and risk management tools to monitor and respond to potential breaches of company policies.
3) **Public Standing** – External reports of environmental and social issues within named company supply chains.

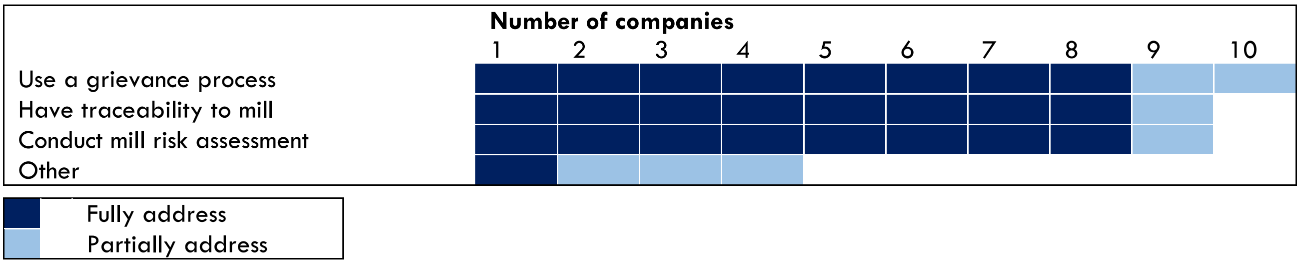
Traceability

Most importers provided traceability progress updates to mill with the exception of one. Traceability tended to be higher for PO than PKO, with the exception of one company, with explanations provided around the fundamental processing differences that make this more difficult. The majority of importers did not provide information on traceability to plantation and few stated that this was an area that they were actively seeking to improve.



Management Practices

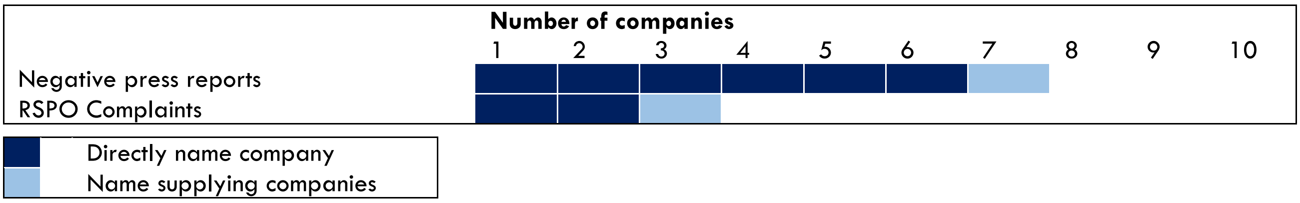
The most common management practices of organisations were to use a grievance process – where communities, producers, or other stakeholders can raise concerns – or applying risk assessments based on a 50km radius around known mills in company supply chains. Most risk assessments were identified as being carried out by ProForest.



Public Standing

Several of the importers have been mentioned in negative press reports. The Greenpeace 'Dirty Bankers' report (2017), Amnesty International's 'The Great Palm Oil Scandal' (2016), Mighty Earth's 'Palm Oil's Black Box' (2016) and the Fair Finance Guide Norway 'The role of Norwegian banks in the Borneo crisis' (2017) are just some examples of reports naming specific companies.

These reports are not uncommon given the focus on palm oil by NGOs and communities. They highlight areas of how community groups and larger NGOs are perceiving and responding to the growth in palm oil production and the risks that they play in the communities they operate in. These reports do not necessarily result in official complaints being made to RSPO which would result in further independent investigation into the allegations. During the survey process companies were asked how they responded to these reports internally. No examples were provided to 3Keel that were not already available in the public domain regarding further actions being taken by businesses to address potential issues.


Number of companies
1
2
3
4
5
6
7
8
9
10
Negative press reports
RSPO Complaints
Directly name company
Name supplying companies

7. Survey Results: Verification

This section provides a review of how companies are verifying that plantations and suppliers are adhering to corporate zero deforestation and exploitation policies.

Generally, importers provide two levels of assurance to RPOTC members that the PO/PKO that they supply to them is free of deforestation and exploitation:

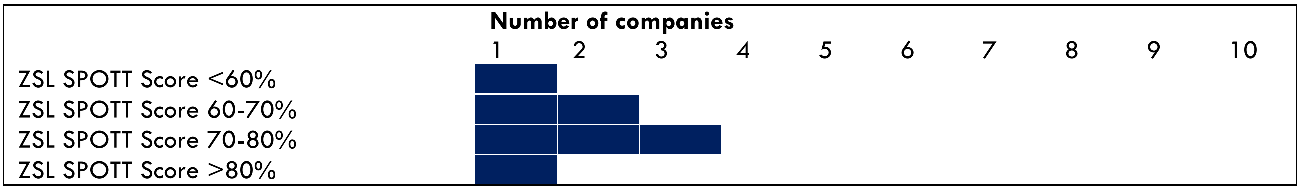
1) **Mill transparency** - Most importers are working towards increasing and verifying the veracity of the geolocation data at the mill level for third party supplied PO/PKO. The presence of geolocation data improves the opportunity for the quality of risk assessments to occur in various regions. This data is typically collected or reviewed by a third party for accuracy and a risk assessment using a 50km radius, and is often being made publicly available on corporate websites and/or Forest Watch.
2) **RSPO certification** – PO/PKO supplied through a certification scheme has had a degree of on the ground verification take place to achieve this classification. All importers indicated that most European PO/PKO is certified to RSPO.

Outside of these two areas, no further evidence was provided to 3Keel regarding additional steps being taken by businesses to verify that policies are being adhered to in third party supply chains.

ZSL SPOTT Score

The Zoological Society of London (ZSL) developed the Sustainable Palm Oil Transparency Toolkit (SPOTT) to aid in the public disclosure of how transparent companies are in their commitments and actions promoting responsible production. A high score does not indicate that company policies are being effective on the ground, or that PO/PKO supplied by them has a lower risk than being supplied by another, and is simply a measure of overall transparency linked with potential risks highlighted by interactive maps.

The score is only applied to palm oil producing companies; traders and ingredient manufacturers are not assessed.



8. Feedback

Importers provided the following feedback to the RPOTC during the 2017 review process:

Retailers are best placed to increase demand for physical CSPO/CSPKO by requiring 100% supply in their contracts.
The most common sentiment from the businesses surveyed was that retailers were removed from the direct supply chain and therefore filling the supply and demand gap for purchasing certified PO/PKO was the most effective role they could play. A few businesses offered alternative suggestions related to additional ways to demonstrate commitment by being more directly involved in working groups and initiatives to support responsible production, including promoting landscape-scale approaches and providing financial support to producers and on the ground training initiatives.

Importers are generally uncomfortable disclosing specific production or trading volumes.
Only one of the ten importers disclosed the total volume of PO/PKO traded by their business. Others were willing to disclose the total volume of RSPO certified, but not the uncertified quantities. When tonnage data was not provided, approximately half of the remaining businesses were willing to disclose proportion of supply that was certified with the remaining refusing to disclose anything related to certified or non-certified proportions. General feedback from businesses indicated that they view anything disclosed in this area as being commercially sensitive. In next year's survey this question should be modified to reflect proportion of supply only to increase the consistency rates of disclosure.

UK and European supply chains are treated differently to global supply of PO/PKO.
Almost all businesses indicated that most of their certified PO/PKO supply was supplied to European customers. Within the European market companies indicated that almost all their supply was RSPO certified. This dynamic resulted in some companies indicating that although their total certified volumes were less than 10% of their supply, 100% of their European supply was certified; working within global retail forums to increase advocate peers in other markets to increase market demand for certified supply may therefore be an area to pursue.

Having a single questionnaire for multiple businesses has been a welcomed initiative.
All importers engaged expressed support for the RPOTC's approach of consolidating requests for information through a single questionnaire. They specifically indicated that over the past few years the volume of requests for information has grown substantially with many companies developing their own questionnaires that are mostly similar but moderately unique, thus increasing what may be viewed as a communication burden for the business. Future promotion of the survey with further businesses that can reduce the number of enquiries they have on zero deforestation and responsible production practices would be welcome (e.g. manufacturers also taking part).

For some importers, face-to-face interaction is desired for collaboration.
There was a high degree of variability of the willingness of importers to engage with the RPOTC and 3Keel during the 2017 assessment. Some companies were supportive of opening a transparent dialogue with retailers to discuss their progress, challenges, and plans whilst others either provided no further information that was already available in the public domain or refused to engage within the process. Regardless of whether a business was supportive of the questionnaire process, most were supportive of having a face-to-face opportunity to describe their approach and progress to addressing these issues.

9. Conclusions and recommendations

The following observations and considerations for future work for the RPOTC have been drawn from assessing the company responses and directly engaging with importers:

<u>Conclusions</u>

- **Specifying 100% RSPO certified PO/PKO is one of the most effective ways for retailers to promote sustainable palm plantation practices at scale.**
  RSPO Next is not currently being actively pursued by many of the selected companies. There are limitations in that the chain of custody mechanisms have not been fully implemented yet for this standard, but none of the businesses surveyed indicated that any actions were being taken at this stage to prepare growers or supply chains for these additional requirements.

- **Corporate policy statements uniformly conform to the CGF definition of zero deforestation.**
  All companies have adopted the same language around applying the principles and definitions of zero deforestation. There are differences in how monitoring and enforcement are being pursued.

- **None of the companies surveyed can guarantee that deforestation or exploitation are not occurring in their supply chains.**
  RSPO supply, which dominates European imports, is consistently identified as being the best way to reduce the risk of these areas, but even RSPO will not provide a 'guarantee' that deforestation is not occurring. This is because RSPO does not currently limit all forms of deforestation (e.g. there is no absolute prohibition on planting on high carbon stock areas) and there are different levels of confidence that can be achieved based on the way the supplier approaches chain of custody certification (e.g. segregated supply vs book and claim). Risk assessment processes are largely uniform between businesses and are dependent on ProForest and/or TFT, as well as grievance processes. As third-party verification efforts of importers are typically limited to traceability, RSPO certification is currently the best way of having minimised risk of these issues from occurring.

- **Supply chain risks are generally only monitored through deforestation potential.**
  Deforestation-based risk assessment compliance with corporate policies leaves a potential gap on assessing exploitation issues. This is a challenge when most risk databases are not able to provide clarity at the geographical level required to prioritise engagement. As the majority of negative NGO campaigning efforts for selected companies have been focused on worker exploitation, this is an area that may need to be developed further.

<u>Recommendations</u>

- **Continue annual survey.**
  This process has provided an avenue for engagement with importers that allows for tangible discussions to take place beyond what is in the public domain. By starting those discussions with an informed update that considers what companies have already stated, conversations and partnerships can delve deeper into the nuances between how different companies are performing.

- **Modify questions to focus beyond policies to focus on specific programmes and actions.**
  Most policies are now in place and are consistent with basic expectations for zero deforestation and exploitation. Monitoring should start asking more detailed questions on engagement with third party suppliers and programmes to address impacts, particularly exploitation and smallholder support.

- **Keep face-to-face visits as part of survey process.**
  Companies were more open in having a dialogue with RPOTC members and some specifics were provided outside of what was presented in the public domain. These candid conversations can be helpful in identifying areas of collaboration and responses to what could otherwise be a purely objective process.