

To what extent and under what circumstances does making a complaint through the Roundtable on Sustainable Palm Oil (RSPO) complaint system contribute to forest conservation?

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The continued development of palm oil (*Elaeis guineensis*) plantations has become one of the most pressing conservation issues in South East Asia in the last few decades, as vast tracts of tropical rainforest have been converted to make way for the crop (Koh & Wilcove, 2008), the world's most widely traded vegetable oil (Rosillo-Calle *et al*, 2009). As Indonesia and Malaysia produce approximately 82% of global palm oil (Persson *et al*, 2014), expansion has had a significant impact on populations of wild orangutans, which are found only in these two countries (Wich *et al*, 2008). The Roundtable on Sustainable Palm Oil (RSPO) was established in 2004 to respond to this growing threat, by providing a sustainable certification standard for the industry (Paoli *et al*, 2010; Yaap & Paoli, 2014). A central component of the RSPO is its complaints system, a mechanism by which any concerned party can formally complain about RSPO members they believe have contravened the RSPO Principles & Criteria (P&C), the specifications all members agree to abide by as a condition of membership (RSPO, 2013).

Although being increasingly used by NGOs and civic society as a way to hold companies to account, whether making a complaint has any impact on forest conservation remains unclear. I examined to what extent and under what circumstances making a complaint through the RSPO complaints system helps to conserve High Conservation Value (HCV) areas on the plantations that are the focus of complaints, and whether making a complaint has any impact on ongoing company policies and behaviour. The PSGB conservation grant was used to cover travel to Indonesia, Malaysia and Singapore, to conduct semi-structured interviews with NGOs who have used of the system, and companies that have been the subject of a complaint, to determine their views on the system's strengths and weaknesses.

I examined five cases lodged because of the clearing of wild orangutan habitat in Indonesia, involving the companies Ibris Palm, Bumitama Agri Ltd and First Resources Ltd. In all cases, there was some degree of HCV forest remaining on the plantation, but making an assessment on the quality of the HCV forest or the extent of degradation was virtually impossible, due to the lack of transparency in the complaints system and the wider palm oil. It was clear, however, that the confusing and inconsistent directives from the complaints panel made effective resolution of complaints difficult, undermining both company and complainant confidence in the system. The lack of enforcement of Stop Work Orders by the RSPO means directives intended to halt forest loss are often not adhered to, and the level of engagement the RSPO expects of complainants, both before and after the complaint is made, slows down the resolution of the complaint, to such an extent that forest on plantations can be almost completely cleared while the complaints panel is deciding on how best to deal with the case.

These issues have undermined confidence in the system and resulted in some NGOs believing that, as making a complaint provides few tangible conservation outcomes, it is not worth the considerable time and resources. As the RSPO is recognised as one of the most effective tools for bringing greater sustainability to the palm oil industry and conserving primate habitat in plantations (Laurance *et al*, 2010), this presents a serious challenge to the RSPO. While understandable, it is a misguided view, as making a complaint does have a positive long term impact on company behaviour. The recent sustainability policies of Wilmar, First Resources and Bumitama have all, to some degree, been impacted by being the recipient of a complaint, and the negative media attention and corresponding impact on company reputation that complaints can bring. Companies that have been the subject of a complaint also show a greater willingness to engage with NGOs and pursue different conservation strategies. Though there is still evidence that public statements by companies are not translating in to changes on the ground, and are in some cases more impacted by consumer and purchaser demands than the RSPO, the composite effect of complaints does make companies more aware of their sustainability commitments.

As many primate species are increasingly threatened by palm oil plantation development and, in most cases, the RSPO remains the only avenue open for NGOs to engage with palm oil companies, a strengthening of the complaints process could have serious positive

outcomes for primate conservation. I recommend that the RSPO make a greater effort to enforce current rules governing transparency in the palm oil industry, work to enforce and monitor Stop Work Orders and strengthen and develop procedures intended to force companies to compensation for forest losses.

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