

GENDER REVIEW FROM INDONESIAN SUSTAINABLE PALM OIL (ISPO)

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This Infobrief was developed to respond to the issuance of the policy package of Presidential Regulation (Perpres) No. 44 Year 2020 and Minister of Agriculture Regulation (Permentan) No. 38 Year 2020, focusing to examine the gender-related substance from these policies and certification tools (principles, criteria, and indicators), and to what extent this instrument can address various gender issues found in the palm oil industry.

WHY GENDER IS IMPORTANT IN THE PALM OIL INDUSTRY AND PALM OIL CERTIFICATION

A. Background

Palm oil is an essential plantation commodity and produces cooking oil, industrial oil, and biofuel (biodiesel). Palm oil also becomes the means of livelihood for at least 4.6 million smallholders and at least 7 million workers in the palm oil sector. The global economic transaction contributed by the palm oil commodity also serves as a crucial source of foreign exchange, even more so because Indonesia is the largest producer of palm oil in the world (around 56.47% of global palm oil production). According to the data from the Indonesian Plantation Statistics 2018-2020: Palm Oil, in 2018 for example, palm oil export (in the form of Crude Palm Oil (CPO) or Palm Kernel Oil (PKO)) was US\$ 18,306 Billion.

However, palm oil is also under the spotlight, especially from the environmental aspect. Allegedly, the loss of million hectares of tropical rainforests and peatlands occurs because they have been converted into palm oil plantations. This issue has indeed become a part of intense pros and cons on the link between palm oil expansion and deforestation rate, especially deforestation to natural forests. Damaged forests have a wide impact: the loss of biodiversity, damaged food source, and the loss of means of livelihood, traditional herbs, and the crucial pillar for

cultural lives and symbolic space for the indigenous people. From the gender aspect, the deforestation issue also occurs hand-in-hand with impoverished feminization, which takes forms on issues like child marriage, reproductive and sexual health, women and children trafficking, and gender-based violence issues (Siscawati, 2020).

The gender dimension of palm oil also presents a colorful narration. Because of its immense role to means of livelihood and the economy, palm oil also has huge relevancy and implication for women. Palm oil expansion also requires the need for cheap labor, and this also opens a wide job opportunity. Despite often being considered as a masculine commodity, women actually supply a large enough portion in the palm oil industry. Women mainly become the majority of daily freelance workers or family workers, both of which have limited access to workers' rights protection, besides having to deal with domestic responsibilities, including childcare (Li, 2015). Concentrating on working on palm oil treatment also puts female workers in a risky position in terms of health, due to exposure to chemical fertilizers and pesticides, in addition to lack of rights fulfillments, such as menstruation and maternity leave, decent and equal wages, good sanitation, and the lack of lactation facilities (Palm Oil Labor Coalition, 2018).

Palm oil also becomes a part of the global trade political negotiations. This is especially apparent when the European Union Parliament issued a resolution on 4 April 2017 to gradually eliminate, ultimately fully restrict, the use of biofuels made of palm oil. This was a heavy blow for Indonesia, considering that the European Union was the second-largest export destination after India.

In the context of trade politics on one hand and the need for sustainable palm oil development on the other hand, the development of the Indonesian Sustainable Palm Oil (ISPO) system as a mandatory palm oil certification becomes an important endeavor we need to appreciate. ISPO aims to ensure the implementation of laws and regulations on palm oil plantations to achieve sustainable palm oil and support the commitment of the President of the Republic of Indonesia to reduce Greenhouse Gas. Different from RSPO, which is voluntary, as regulated by the Government of Indonesia, ISPO is mandatory for palm oil business actors. As a note, if at the beginning it is voluntary for smallholders, ISPO is developing and then will be mandatory for all, including smallholders, with adjusted principles and criteria, including for 5 years of a transitional period.

The government has issued Presidential Regulation 44/2020 concerning the Indonesian Sustainable Palm Oil Plantation Certification System and the Minister

of Agriculture Regulation 38/ 2020 concerning the Implementation of Indonesian Sustainable Palm Oil Plantation Certification. Both of these policies marked a new chapter of the ISPO development. This issuance of this latest ISPO policy package brought many hopes and challenges, including from the gender aspect. The main question from a gender aspect is how to integrate the gender aspect in this policy package, and to what extent can we put our hopes up that this policy package can contribute to a more gender-responsive and sustainable palm oil management? This infobrief was developed to address these questions

B. Palm Oil, Smallholders, and Large Companies

Palm oil farmers (Smallholders) play an important role in palm oil cultivation and trade. The Palm Oil Statistic Data in 2020 showed that 40.62% of the total palm oil land in Indonesia was owned by smallholder plantations. This number ranked second after the first place, which was held by large private plantations, with a total area of 55.09%. For smallholder palm oil plantations, the provinces with the largest area in 2018, in order, were Riau Islands, Jambi, South Sumatra, and West Kalimantan. The main issues faced by smallholder plantations were low productivity and production quality (Plantation Statistics, 2020). This can be seen in the following table of the profile of palm oil total area and productivity in Indonesia:

Tabel 1. Total area and productivity of palm oil based on the ownership status

Year	Smallholder Plantations		State Plantations		Private Plantations	
	Total Area (Ha)	Production (Ton)	Total Area (Ha)	Production (Ton)	Total Area (Ha)	Production (Ton)
2018	5.818.888	15.296.801	614.756	2.147.136	7.892.706	25.439.694
2019*	6.035.742	16.223.527	627.042	2.306.751	8.061.636	27.330.844
2020*	6.090.883	17.375.397	643.488	2.470.529	8.261.639	29.271.334

*: temporary numbers



From the above table, we can see that in 2020, for example, even though the total smallholder plantation area was 40.62% of the total palm oil area, on the production side, the total production of smallholder plantations was only 35.38% of the total palm oil production. Compare it with private plantations, wherewith an area of 55%, the production reached 59.59% of the total palm oil production. One of the reasons for this low smallholder palm oil productivity was the technology used was relatively simple (from seeding to harvesting).

However, we need to understand that palm oil smallholders are not homogenous. They are also divided into several groups, and each group can have a different character and problem; smallholders bound by a company, bound smallholders who are also independent farmers, and independent smallholders. Looking at these diverse smallholder positions is also important in examining the extent to which the schemes promoted in the certification need to consider smallholders' position and relationship with companies.

The claim of having considered strengthening the welfare of smallholders was one of the things proposed by the Roundtable on Sustainable Palm Oil (RSPO), especially in strengthening the means of livelihood of villagers and reducing negative environmental impact. A study conducted by De Vos (et.al, 2021) found that RSPO-certified farmers showed a different performance than those who were not certified, specifically in plantation management practices (quality seeds and using more standardized fertilizers), and had significantly higher plantation yields (22.45 vs 14.5 ton of bunch of fresh fruits per hectare per year). However, this study examined that the difference in yields/productivity could not be explained as a result of the certification, but more as a result of existing pre-conditions before certification, like the presence of strong smallholder groups.

In the context explained above, the issuance of ISPO-related policy packages can be interpreted positively as the government's effort to increase market acceptance through promotion using a sustainable palm oil approach. Sustainability here needs to be placed as an approach that brings together the interests of conservation and welfare, especially the smallholders' welfare. It is in this spirit that efforts to review and strengthen the ISPO development from the gender aspect need to be placed.

EXAMINING GENDER ISSUES IN THE PALM OIL INDUSTRY

Despite being an important issue in plantation commodities, such as palm oil, the gender issue is often sidelined in various public debates, including those related to sustainable palm oil. Even when women hold various positions and identities linked to the palm oil commodity, like as plantation workers, farmers, or members of local communities, their voices and interests are often hidden.

The following section describes gender issues and conditions faced by women and marginalized groups in relation to the palm oil commodity.

- a. **Land Ownership.** This is crucial due to its correlation with representation in the process of negotiating land acquisition and subsequent benefit flow. Even further, women's marginalization in the negotiation process for decision-making on land conversion is most likely also experienced by indigenous women who are relatively equal but are facing the gender norm in bureaucracy that excludes women (Basnett, et al, 2017). The marginalization of women is also most likely to occur during the formalization (land certification) process, which follows the state law and tends to be recorded under the name of men (Julia & White, 2012). A case study in Sanggau within the Dayak Hibun community, as shown in this study, shows a shift, where the head of the family (men) system promoted by the state and referred to by corporations in registering farmers has eroded the economy and recognition of women's position within the Dayak Hibun indigenous community. Previously, in the indigenous scheme, women shared land ownership with men, especially for ownership from an inheritance, which was not based on gender differentiation.
- b. **Work and Gender in the Palm Oil Industry.** The primary issue that often occurs in relation to the position of plantation workers is the tendency of women being positioned as weak workers (Li, 2015). It is important to examine the gender implication of the shift of position from independent farmers or smallholders to casual workers, particularly as a form of negotiation to fulfill the gender role related to childcare and nurture. In addition, women tend to be family workers, critically contributing to meet the work target recorded under the name of male workers/head of households, but do not obtain the right fulfillment benefits as workers. The same finding was also conveyed by the Indonesian Palm Oil Labor Coalition, that the majority of invisible workers, who do not get law protection insurance, are women. These women who are invisible workers dominate the work of maintaining the plantation, exposing them to pesticides and chemical fertilizers, but do not get sufficient rights fulfillment, especially in obtaining social insurance, work equipment, fixed allowance, and the right to form a union. Due to their position, their rights as female workers are also not being met, especially related to menstruation and maternity leave, as well as lactation facilities
- c. **Gender-based violence.** The violence phenomenon is also a gender problem rooted in unbalanced power relations and objectification of women's bodies. Gender-based violence can occur in various locations, from households and workplaces (like plantations and offices) to wider public spaces. Some reports mention that gender-based violence also happens in palm oil plantations, although there is no comprehensive data on actual cases and violence patterns. The result of an investigation by the Associated Press (AP) in Indonesia and Malaysia found bad treatment done to female workers, including sexual harassment (from verbal harassment to rape). In this investigation, AP interviewed more than three dozen women and girls from at least 12 companies across Indonesia and Malaysia. The investigation also found that these practices even happen to workers who have green certification (RSPO).¹ This allegation was denied by, among others, GAPKI (2020), which mentioned that this allegation is baseless because the company has provided educational and other social facilities in the plantation area. GAPKI also criticized the news as a part of the world biofuel trade war.²
- d. **The phenomenon of child labor in palm oil plantations.** The issue of child labor has become a hot aspect in palm oil diplomacy and trade.

1. AP Investigation Found Sexual Violence Culture in the Palm Oil Industry. 19 November 2020. Link: <https://bit.ly/3l5VgDt>

2. cnnIndonesia.com, Female Labors in Palm Oil Plantations snared in Sexual Harassment, 19 Nov 2020. Link: <https://bit.ly/3lauUpU>

Reports on child labor in the palm oil industry can be seen in, among others, a coverage from Associated Press (2020), which found child workers in Malaysia and Indonesia. The report mentioned an issue of child workers being exposed to dangerous conditions (exposure to chemicals), sexual harassment, prone to become victims of child trafficking, and cannot go to school. This report also shows that child workers are part of the supply chain for food processing products, such as cereal, candy, and ice cream, sold by many well-known brands at the global level. The United States Department of Labor even includes Indonesian palm oil as the annual list of products generated from child workers in 2015.

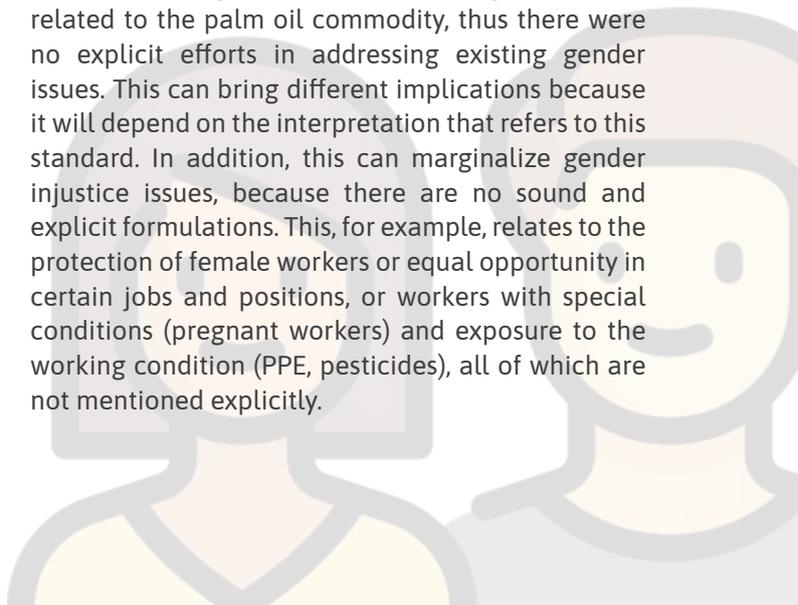
- e. **Gender and Social Exclusion Issues in Smallholder Palm Oil Plantations** The assessment on the smallholder palm oil industry in Kotim-Central Kalimantan and Berau-East Kalimantan also found gender issues related to gender-based job division, the unseen contribution from women in the palm oil supply chain, and issues related to gender-based discrimination and risk of violence (Fatimah, 2019). While palm oil is often associated with a male commodity, as with palm oil in large companies, the contribution of women in palm oil plantations is actually also important in cultivation and post-harvest. Women also contribute to joint activities (working together) in clearing land, seeding, spraying, cutting, collecting *brondolan*, fertilizing, and using *klerat* (to control rat pests). Women's activities look minuscule and routine, but actually quite time and energy-consuming. However, women are not quite represented in farmer group organizations or are localized in a feminine role (for example as a treasurer).

workload, income and job opportunity, and representation in decision making (Sexsmith, 2017). The principles, criteria, and indicators developed in certifications like ISPO and RSPO, are important aspects in promoting sustainable palm oil. Through these instruments, the gender dimension has a chance to become a part of palm oil cultivation and trade practices. However, the implementation is also no walk in the park. The study from Hanifa & Pramudya (2017) on palm oil smallholders showed various challenges, both related to the gender social norm and institutional and technical management dimension. These include social norm on gender that considers gender discrimination practices (like the concept of head of the family and breadwinner, female leadership, and violence) as common and a non-issue. Gender issues also intersect with social phenomenon such as migration and women's position in the labor force structure in the palm oil industry. Furthermore, the social norm on gender will also affect institutional practices and operationalization at the technical level, including during the certification process, where attention on the gender aspect is not a priority and is considered difficult by auditors and certification agencies. As a comparison, gender principles, criteria, and indicators are considered more abstract and difficult than other principles and criteria, for example, the transparency principle. Even though this issue is gaining more attention in the global palm oil market, for civil society organizations with a background mostly on the environment issue, the gender aspect in labor policies and practices has yet to be the primary attention.

Let us see the extent of integration of the above-mentioned gender issue considerations in the development of the ISPO standard. When we examine it in general, the word gender or women is not explicitly mentioned in the developed standard. As a standard, ISPO was developed using a gender-neutral approach, in which this standard was not developed based on a recognition that there were gender issues related to the palm oil commodity, thus there were no explicit efforts in addressing existing gender issues. This can bring different implications because it will depend on the interpretation that refers to this standard. In addition, this can marginalize gender injustice issues, because there are no sound and explicit formulations. This, for example, relates to the protection of female workers or equal opportunity in certain jobs and positions, or workers with special conditions (pregnant workers) and exposure to the working condition (PPE, pesticides), all of which are not mentioned explicitly.

► GENDER REVIEW FROM THE LATEST ISPO

Certification becomes an important scheme in promoting the sustainability aspect of commodities and increasing market acceptance. From the gender aspect, commodity certification has the potential to become one of the instruments in recognizing and protecting women's rights as well promoting a change in gender-based power relations, when it can address gender issues related to the aspects of tenurial, access to productive resources, domestic



However, the substance of gender equality and women and children’s rights has been implicitly accommodated in several ISPO principles below (Herryadi, 2021):

- Principle 4 of ISPO for companies, with the following scope: there shall not be any forced work, slavery, child workers, discrimination, and sexual harassment
- The same treatment in working opportunity, the right to take breaks and leaves, establishing target according to capacity and working facilities.
- The company may not hold a document (s) owned by workers, must prepare a manpower report to the Office (normative in relation to the development), and facilitate the establishment of workers’ unions and cooperatives
- In the Smallholder ISPO standard, there is Principle 2, in that smallholder organization must serve as a mutual platform to fulfill the aspirations and needs of its members. This can be interpreted as an effort to accommodate women’s interests as a part of workers.

a. Opportunity of Integrating Gender Issues in ISPO

The opportunity of integrating gender issues in the ISPO principle can at least be seen in the first five principles of ISPO, in the following table

Table 2. Opportunity for Gender Integration into ISPO Principles

Principle	Gender Integration Opportunity
Principle 1. Compliance to Laws and Regulations	Women’s position and voice in determining land status and also conversion including in resolving tenurial conflicts in opening & developing palm oil plantations
Principle 2. Implementing good plantation practices	Efforts to address equal access for men and women in capacity building (training and access to information) and institutional capacity to promote good plantation practices

Principle 3. Environmental, natural resources, and biodiversity management	Environmental quality and biodiversity risks related to the palm oil industry and their impact on women
Principle 4. Employment responsibility	Gender inequality related to wages, fulfillment of welfare and social insurance, the risk of child labor, and freedom to establish a union for female workers
Principle 5. Social responsibility and community economic empowerment	Gender issues related to empowering the economy of female community members living around the forest/ palm oil plantations, also a responsibility on fulfilling the rights of indigenous women

Even though these five principles apply to companies, fundamentally, the integration opportunity can also be done using a similar approach to smallholders, of course by considering the transition and affirmation aspects for smallholders.

b. Lessons Learned from RSPO

Considering that gender and social issues are a big part of the palm oil dynamics, it can be understood that certification development also integrates social and gender aspects. Two palm oil certification schemes that serve as the main references are a mandatory and public/state-initiated certification, namely ISPO, and a voluntary scheme initiated by non-state actors, namely RSPO. A study from UNDP (2015) showed that both ISPO and RSPO place certification as an effort to reduce deforestation, and only grants certification to plantation companies with legally approved lands. However, there is a difference in interpreting HCV, Free Prior Informed Consent (FPIC), and new planting procedures.

RSPO is also an interesting reference to see the integration of gender and social aspects in this certification. The study from Basnett et.al (2017) showed that RSPO was developed using a gender-neutral assumption, thus not made to be gender-specific, because gender was considered a family matter and the community did not need to get into the scope of RSPO. This study from Basnett et.al also showed the following:

There was some progress from the gender aspect, including:

- Principle 6 was an explicit formulation: responsible consideration to employees, individuals, and communities affected by plantation and factory workers. Women and gender became a part of the indicators related to the rights of workers and affected communities, workers' health and safety standards, and the establishment of new companies.
- Indicators and guidelines on complaint mechanism (principle 6.3) that were more gender-sensitive compared to FPIC, recommendation on female representation in the joint consultative committee, and women's right to fair compensation (Principle 6.4.2).
- The potential palm oil impact on the surrounding community, including women, was included in Principle 7, despite no guideline on assessing this impact.
- Principle 2 on rights over lands, principle 6 on affected communities, and principle 7 on the development of new plantations are actually related to FPIC. However, FPIC indicators and guidelines use gender-neutral languages and do not explicitly mention that women need to be involved in negotiations during and after land acquisition on new planting. They also do not calculate the conflict risk between land ownership by women and access to tradition and indigenous rights.
- Balanced participation from the gender aspect is not mandatory, and there are no further guidelines on fair compensation, including no guideline on palm oil impact assessment on the community, including women, in principle 7.
- Highlighting women's rights, even though the guideline given for auditor's assessment is very minimal, and more oriented towards the process (documentation, consultation), without clear assessment parameters.

Notes from the gender aspect. The following notes need to be paid attention to, especially considering how the gender dimension can be operationalized in certification:

In addition, the social aspect in RSPO, specifically for smallholders, includes two important principles, with the following criteria description.



Table 3. Social and Gender Aspect in RSPO

<p>Principle: Ensuring Legality, Respect towards Land Rights and People’s Welfare</p>	<p>Principle: Recognizing human rights, including workers’ rights and working conditions</p>
<ul style="list-style-type: none"> • Criteria 2.1. Farmers have the legal or indigenous right to use land according to the national law, local law, and indigenous practices • Criteria 2.2. Farmers have not obtained land from indigenous people, local people, or other users without Free and Prior Informed Consent based on a simplified FPIC approach • Criteria 2.3. The right to use land not being disputed by indigenous people, local people, or other users • Criteria 2.4. Farmer plots are located outside of areas classified as national parks or protected areas, as defined by the national, regional, or local law, or as determined in the National Interpretation. • Criteria 2.5 For new planning, smallholders will not open or get land without obtaining Free and Prior Informed Consent (FPIC) from the indigenous people and/or local community and/or other users, based on a simplified FPIC approach 	<ul style="list-style-type: none"> • Criteria 3.1 No use of forced labor. • Criteria 3.2 Children are not worked or exploited. Work by children is acceptable in family farms, under the supervision of an adult, and does not disturb the education program. Children are not exposed to dangerous working conditions • Criteria 3.3. Labors’ wages are according to the minimum legal requirements and mandatory industry standards as determined by the national law or mutual negotiation (referring to the ones prioritized in the local regulation) • Criteria 3.4 Workers understand their rights and freedom to file complaints to the relevant manager group or third party, including RSPO. • Criteria 3.5. Working conditions and facilities are safe and fulfill the minimum legal requirements • Criteria 3.6. No discrimination, harassment, or abuse on the farm.

From the two certifications reviewed, both ISPO and RSPO offer hope in terms of promoting gender integration into sustainable palm oil development. Even though there is a note that both are designed using a gender-neutral approach, there is room and opportunity to place gender as an important issue that needs to be considered in palm oil development. The opportunity for integration can be seen with existing principle formulation to accommodate steps in addressing gender issues.

Thus, sustainable palm oil plantation practices need to be developed not only to address environmental issues that have been the priority but also need to be further strengthened in answering existing gender and social exclusion issues. This can contribute to achieving sustainable palm oil development goals in ensuring the welfare of smallholders, both women and men.



THE STRENGTHS AND CHALLENGES OF ISPO IN ADDRESSING GENDER ISSUES IN THE PALM OIL INDUSTRY

One of the strengths of ISPO is its mandatory nature, requiring every business actor to comply with the standard as a part of maintaining national interest and building market acceptance. ISPO Standard also needs to be appreciated when it creates a standard that also covers smallholders by trying to match it with the need to strengthen their position. The approach uses affirmation measures so that smallholders' yields are increasingly accepted by the market, but is made lighter to accommodate smallholders' conditions (Herryadi, 2021). Therefore, for smallholders, certification is needed not only to assess compliance but also suitability, with the spirit of continual improvement so that smallholders can meet the certification standard on gender. This is one of the essences of the interesting approach selected by ISPO, namely the continual improvement, especially in smallholder actors.

Lessons learned from various certifications show that a good standard has rigid criteria and does not cause multi-interpretation. This includes the principle, criteria, and indicator aspects, thus enabling business actors (both companies and smallholders) to understand how they can meet these principles, criteria, and indicators, according to their roles and responsibilities. In addition, the equally important part is the presence of an independent auditor as the third party, with a capacity measured by the National Accreditation Committee (KAN). The auditor will refer to existing indicators, hence the clarity of the standard will be very helpful for auditors to work and assess the alignment of plantation practices with the certification standard.

Despite taking the middle ground by offering the above approach, ISPO is also faced with a number of challenges, as follows:

- a. Companies in general will look at cost and benefit, especially in its financial aspect. Currently, not many documentations have shown the benefit of certification from the gender aspect, for example, the positive response/market acceptance when companies and smallholders apply standards related to the gender aspect. If good practices on gender integration benefit on business development can be demonstrated, it can be a tool to promote and establish a wider acceptance of this approach.
- b. A verifier for each principle and criteria. Some gender issues require layered and careful verification, therefore verification on just the formal aspects may not be enough to explore existing gender issues. For example, exploring sensitive issues, such as violence against women, requires careful and appropriate measures and methods, for example, the approach that does not blame the victim and understands not just the formal but also body language, which can be obtained through, among others, observations.
- c. Challenges related to current social norms, for example, the assumption that gender-based wage inequality is common and normal in some cultural contexts.

CONCLUSION AND RECOMMENDATION

Conclusion

The effort to develop sustainable palm oil by developing ISPO is an important initiative that must continue to be strengthened. Certification, when formulated and implemented properly, has the potential to not only promote commodity development and improved market acceptance but can also bring social and economic benefits for a wider community, including in promoting gender equality in sustainable palm oil development. Steps to ensure gender integration in five of seven principles, as mentioned above, need to be prioritized by both large-scale plantations and smallholders. If so, the ISPO certification will not only contribute to addressing environmental issues, which are the priorities all this time but also contribute to gender equality and justice for women and men who are a part of the palm oil industry. Considering the important role of palm oil for the national economy and means of livelihood for millions of households, a certification with clear substances and measures in promoting gender equality will also potentially be able to promote improvement on the welfare of women and marginalized groups and promote a more gender-just power relations.

However, this effort needs to be done by seriously mapping and taking the right and consistent measures to address various gender issues in the palm oil commodity. The wisdom and seriousness in mapping gender issues and conducting ongoing improvement measures are crucial, both in companies and smallholders. This requires cooperation between parties, starting from the government, ISPO committee, accreditation agencies (especially auditors), to auditees (companies and smallholders), and various other key parties.

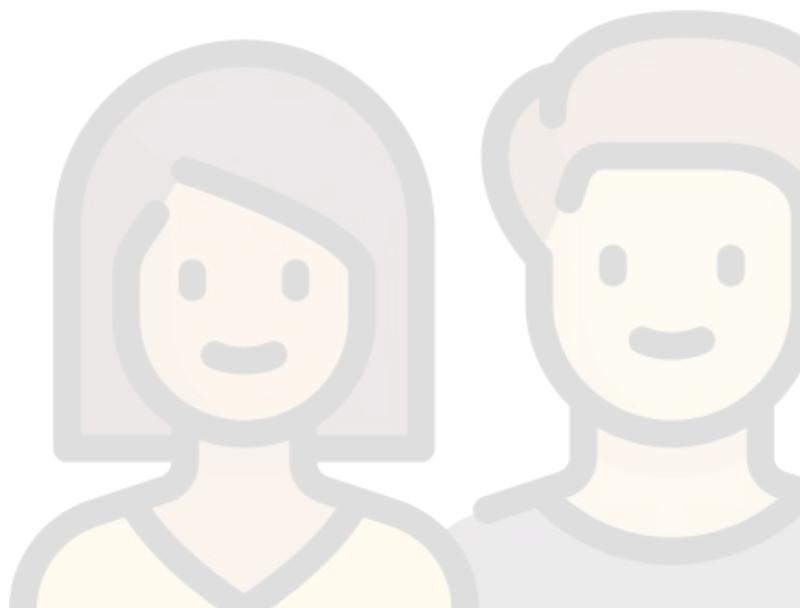
Recommendation³:

- The ISPO Committee needs to develop a guideline for auditors and auditee to make the certification standard more operational. In particular, translating existing principles and criteria with a more rigid and not multi interpretation indicator formulation, as well as a clear way to measure them.
- As a mandatory scheme, which means it is forcible, the legal argument needs to be strengthened and clarified with the concept and situation in Indonesia. The standard needs to mention specifically the laws and regulations reference used in terms of gender equality and social inclusion.
- Promoting the standard is not an easy process, but can be done with a gradual enforcement scheme. The standard can regulate the compliance and conformance aspects. The conformance aspect can provide space for more varied gradations/levels through milestones that can be referred to by business actors, which gradually will move towards better results. These milestones can also be used by auditors to conduct monitoring on whether indicators have been met in the standard, and if not, they can recommend the necessary improvement measures.
- Capacity and institutional strengthening, particularly for auditors and auditees as the front lines of the certification. For auditors, capacity building on gender is absolutely needed due to the still varied understandings of gender. In addition, capacity building will also enable auditors to not only conduct audits but also provide improvement recommendations. For the record, from 3 auditor aspects (business-cultivation, environment, and social), it is essential to build the capacity for auditors in charge of the social aspect, by adding knowledge on the concept of gender and its implication for the audit process. Besides capacity building, we also need to examine the integrity dimension, including promoting the establishment of the auditor community to maintain the integrity and this collective support.
- Periodic review to the standard, by looking at the transition stages for smallholders and also progress and challenges in implementing the standard for companies.

3. This section was formulated based on an online discussion with Herryadi, a member of the ISPO Committee. The discussion took place on 23 December 2021.

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