



Forest  
Positive

# Deforestation Monitoring and Response Framework

Version 1.0 Developed  
by The Consumer Goods  
Forum's **Forest Positive**  
Coalition of Action

[www.tcgfforestpositive.com](http://www.tcgfforestpositive.com)

**MARCH**  
**2022**



An aerial photograph of a vast, dense palm forest. The palm trees are tightly packed, creating a textured, green canopy. In the lower right quadrant, a small, calm pond reflects the surrounding greenery. The lighting is soft, suggesting a late afternoon or early morning setting.

## About the Forest Positive Coalition of Action

The Consumer Goods Forum (CGF) Forest Positive Coalition of Action is a CEO-led initiative representing 21 CGF member companies who are committed to leveraging collective action and accelerating systemic efforts to remove deforestation, forest degradation and conversion from key commodity supply chains. Launched in 2020, the Coalition represents a dynamic shift in the industry's approach to stopping deforestation: by mobilising the leading position of member companies to build multi-stakeholder partnerships and develop effective implementation and engagement strategies, the Coalition brings together diverse stakeholders for sustainable impact. These efforts support the development of forest-positive businesses that drive transformational change in key landscapes and commodity supply chains, strengthening the resilience of communities and ecosystems worldwide. To learn more about the Forest Positive Coalition, visit [www.tcgfforestpositive.com](http://www.tcgfforestpositive.com).

The Coalition is being supported by the Tropical Forest Alliance and Proforest as strategic and technical partners.



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## Context

The Consumer Goods Forum's (CGF) Forest Positive Coalition (FPC) was launched to leverage the collective action of its member companies to use their combined influence to drive and accelerate efforts to remove deforestation from not only their own commodity supply chains, but across their suppliers' entire supply base. The Coalition believes that its collective reach will enable members to make progress on four goals:

1. Accelerate efforts to remove commodity-driven deforestation from individual supply chains.
2. Set higher expectations for traders to act across their entire supply base.
3. Drive transformational change in key commodity landscapes.
4. Define measurable outcomes on which all members agree to track and report both individually and collectively.

To address these goals under Element 3 (Monitoring and Response) of the Palm Oil Roadmap, the FPC has developed two workstreams focused on tackling deforestation non-compliances in or linked to CGF FPC member's palm supply chains:

1. **Response Framework (RF)** (see section 1) – to clarify CGF FPC roles/responsibilities and streamline response to deforestation non-compliances.
2. **Monitoring “minimum requirements” guidance (MRs)** (see section 2) – to improve consistency of monitoring information to streamline response.

This document contains the output guidance developed under these two workstreams, collectively referred to as the Monitoring and Response Framework (MRF).

## Timeline

The Monitoring and Response Framework (MRF) is formally adopted by the CGF and FPC members from January 1<sup>st</sup>, 2022 and applies to subsequent non-compliances identified by members. Progress will be reported through the CGF and by individual members against KPIs articulated in the CGF FPC Palm Oil Roadmap.

The MRF will be a living document, subject to updates that reflect FPC member experiences, feedback from traders, refiners and others in the value chain, civil society insights, and specific workstreams that seek to build on the momentum of this initial draft to further improve how non-compliances are addressed.

## Guiding Principles

The MRF has been developed with the aim of meeting the following principles:

- Maximize the leverage of the Forest Positive Coalition, and its individual members, to **drive better environmental outcomes** and strengthen the palm oil value chain's ability to meet No Deforestation or Development on Peatland (NDP);
- **Standardize and articulate expectations of FPC members** to the rest of the value chain;
- Enable the **efficient use of resources** focused on action including by minimizing duplication of resources between members and between different parts of the value chain;
- Enable members to **clearly and more simply communicate** to the value chain, civil society and others how alerts are managed both in the short term through timely response to grievances and to drive longer term improvements; and
- **Comply with core competition law principles**, including that members must not coordinate their commercial conduct, must decide on an individual basis how to engage with their suppliers, and must not share or discuss competitively sensitive information regarding their own commercial/operational decisions.

## Application of the MRF

FPC recommends that members use the Monitoring and Response Framework as guidance to address alerts identified through deforestation monitoring platforms and other sources, including to set their own sourcing expectations for their Tier 1 suppliers, and make their own sourcing decisions, based on a set of possible actions. For the avoidance of doubt, FPC members must always decide independently and on an individual basis as to whether and how to respond to deforestation alerts.

## Scope

The scope of the monitoring guidance is as follows:

- Palm oil only, but lessons will be shared for other commodities across the FPC.
- Focus is on deforestation and peat conversion, plus secondarily data on fire.
- Geographic scope: main production areas for palm oil including South East Asia (Malaysia, Indonesia), Oceania (Papua New Guinea & Solomon Islands), Latin America and West/Central Africa.
- Social issues such as labour issues and land rights are not currently in-scope, but the framework will be reviewed for application in these and potentially other areas in the future.

## Scenarios

The MRF reflects three potential scenarios of deforestation non-compliances.

- **Scenario 1:** Deforestation non-compliance takes place inside a concession linked directly to a mill in the supply base or to group with mills in the supply base of a CGF FPC member. Producer groups without mills but with multiple concessions owned by the same group are considered in Scenario 1.
- **Scenario 2:** Deforestation non-compliance occurs in an independent concession not part of a producer group and without any known links to existing mills.
- **Scenario 3:** Deforestation non-compliance occurs outside any known concession.

It is expected that most of the alerts that FPC members will identify come from Scenario 3 (Deforestation non-compliance occurring outside any known concession) and that the number of alerts in Scenarios 2 and 1 will decrease over time as FPC member actions following the Framework take effect.

Each Scenario consists of a decision tree addressing the steps that FPC members identified as good practice for palm oil supply chains in order to address non-compliances. Each decision tree comprises of four steps:



Additionally, the MRF contains detailed supporting guidance on roles and actions that FPC members should consider with their palm oil supply chains in order to address identified deforestation non-compliances. This document provides a summary of the guidance that FPC members may use to ensure that non-compliances are effectively addressed.

## Scenario 3 Context

The CGF FPC notes evidence that deforestation events in palm landscapes appear to be increasingly occurring outside large concessions, with varying drivers including other commodities/sectors, and very large numbers of smaller or medium-sized palm producers for which there is inadequate information on ownership and supply chain relationships. For community or smallholder deforestation, where livelihood needs are a primary motivation, appropriate responses must be adapted to be equitable and not unfairly punish smallholders without the means to comply with supply chain expectations.

Existing approaches such as producer group engagement and concession monitoring have proved less effective and carry risks, including undermining smallholder livelihoods. Different proactive and collaborative strategies are required that work with producers, producer country governments (at national and sub-national levels), local communities and other stakeholders to understand local livelihoods and economic needs and get ahead of the deforestation curve in these critical areas.

Therefore, Scenario 3 of the Monitoring and Response Framework has a different emphasis to Scenarios 1 & 2 and aims to drive a more collaborative approach with a focus on highest priority origins and a stepwise approach with grievance management only applying after capacity building & engagement efforts.

## Anti-trust Principles

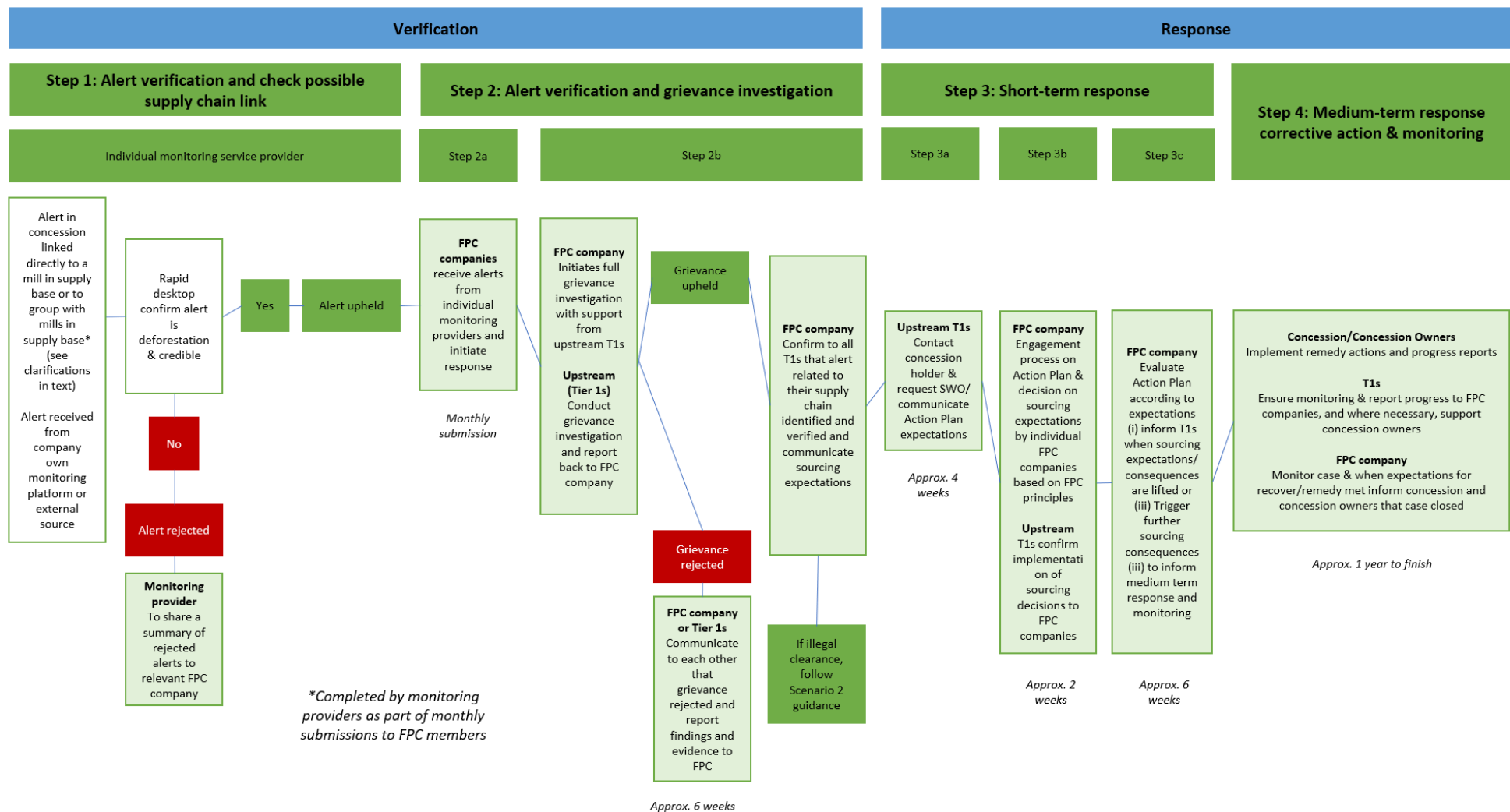
The Monitoring and Response Framework has been written to comply with anti-trust laws. FPC members are committed to ensuring that these antitrust laws are followed, including through the adoption of the following principles for using the MRF. These include but are not limited to:

- The MRF aims to outline various proposed actions that FPC members could undertake to help achieve Forest Positive Coalition's goals, specifically improving industry responses to deforestation alerts towards remediation.
- FPC members must always decide independently and on an individual basis as to whether and how to respond to deforestation alerts.
- FPC members will follow all anti-trust rules and continue to seek expert legal advice in the application of the Response Framework in their own supply chains.
- Any reporting/information sharing for the purpose of monitoring and reporting non compliances will comply with anti-trust law principles, e.g., not including commercially sensitive information.
- If the sourcing expectations pertain to competitive conduct/parameters (e.g., decision to stop sourcing from a supplier, volumes, pricing) FPC members must communicate those sourcing expectations individually to their suppliers.
- While the Monitoring and Response Framework is currently focused on palm oil, FPC members will monitor deforestation alerts of companies in their palm oil supply chain that are linked to other commodities when taking a whole farm approach.
- If a Tier 1 supplies to an FPC company which buys from a group against which a DF alert has been raised, BUT the Tier 1 is claiming that it is not supplying any physical material to the FPC company from that group, the FPC company will nevertheless be expected to engage the Tier 1 regarding this alert and follow this Monitoring and Response Framework.
- If a grower implements initial actions (e.g., the SWO) but it takes longer than MRF timelines to make progress on other activities (i.e., there is willingness to engage AND progress is being made), FPC members will individually explore the possibility of having a degree of flexibility in MRF timelines.

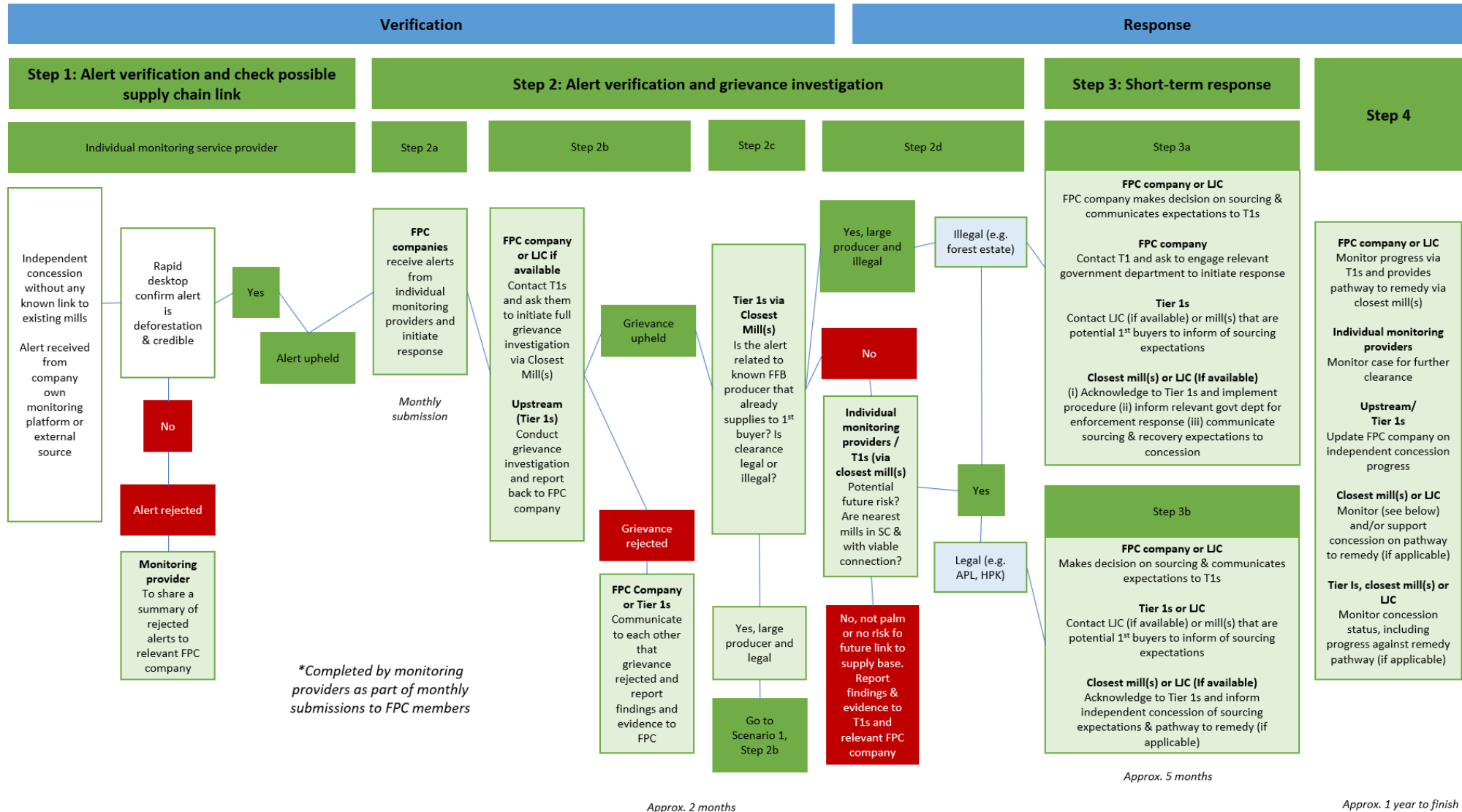


# Response Framework

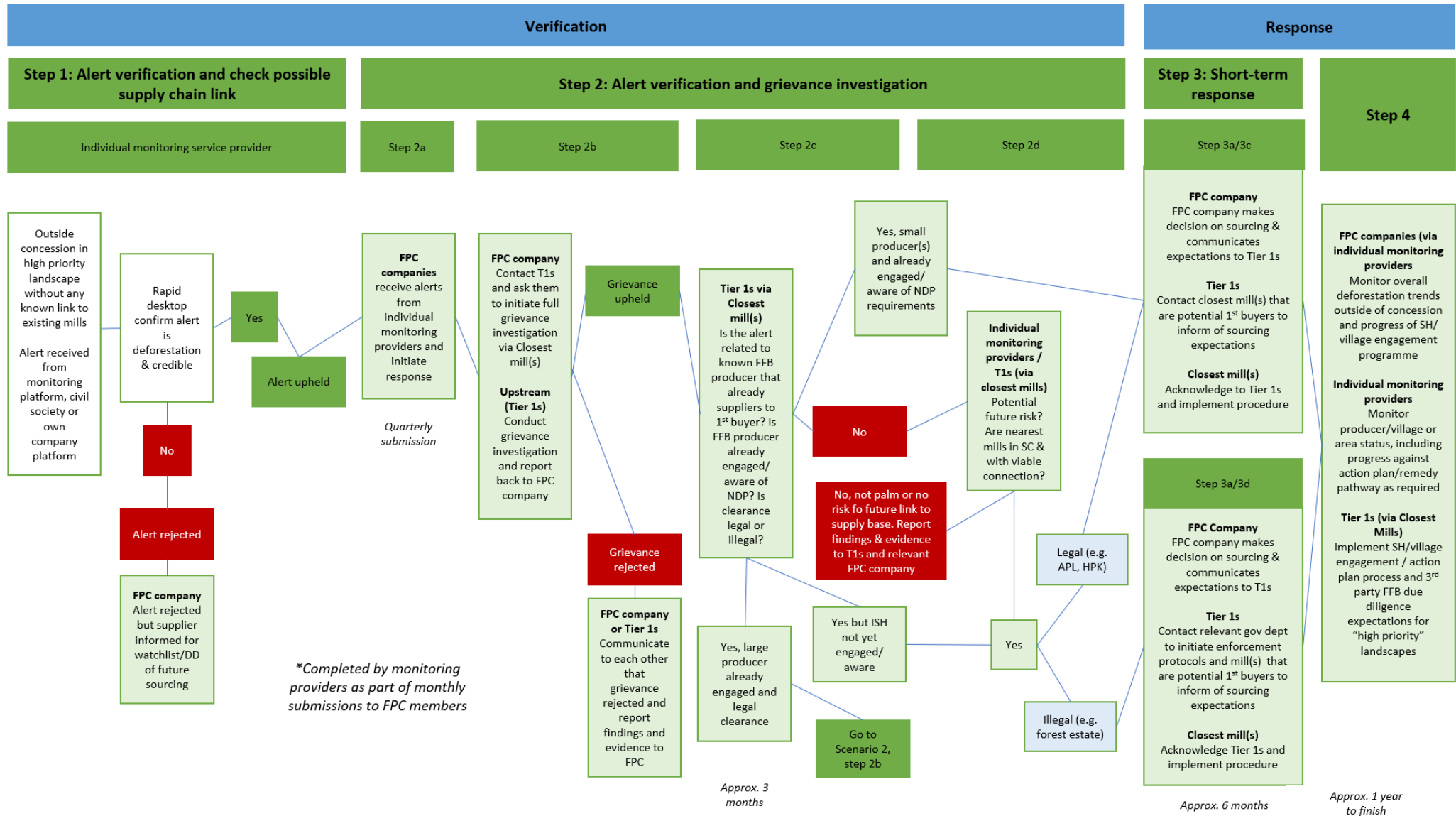
## Scenario 1: Deforestation non-compliance in concessions & associated producer groups



## Scenario 2: Deforestation non-compliance in independent concessions

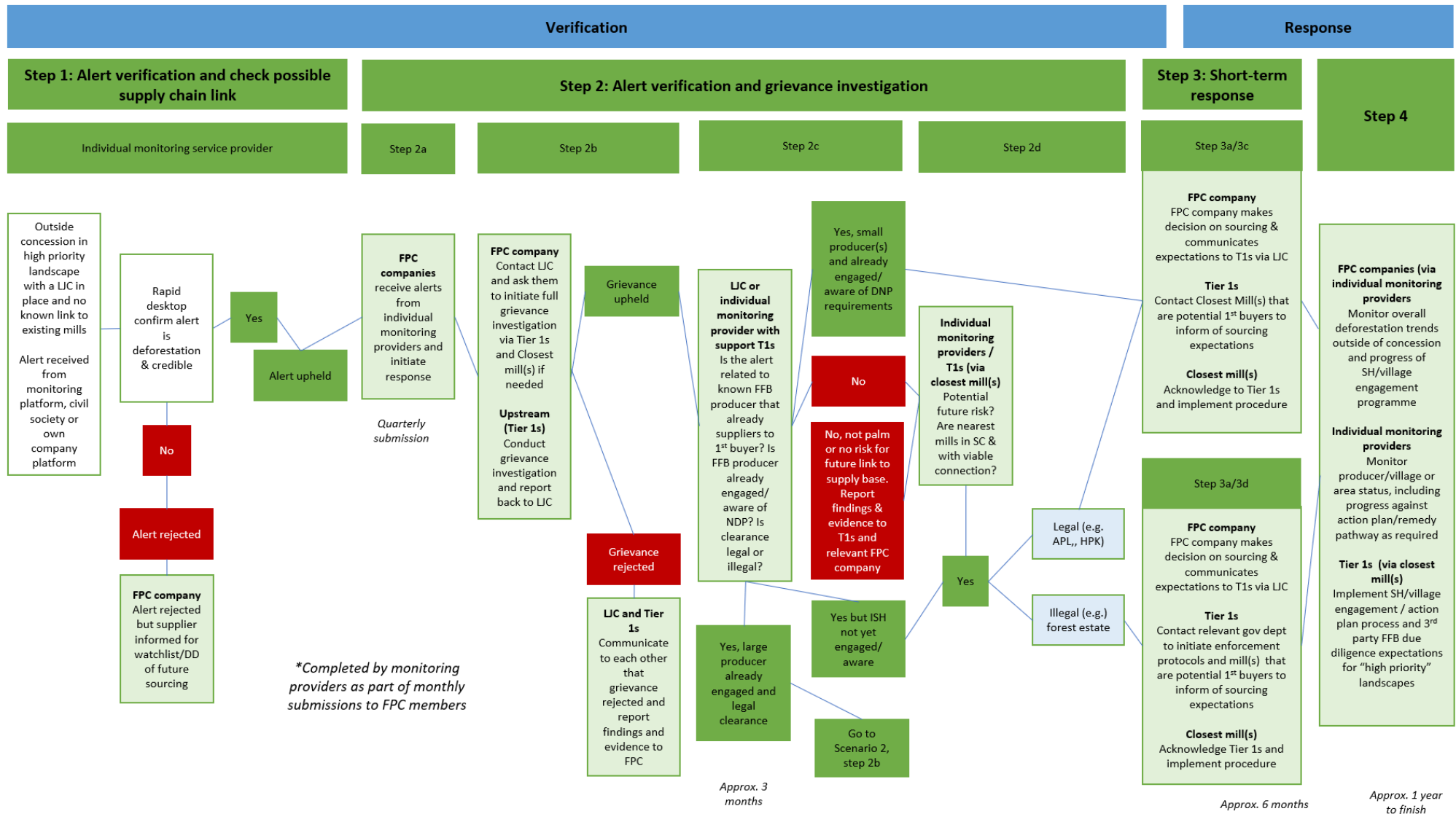


### Scenario 3a: High-priority landscape with no existing landscape/jurisdictional initiative





# Scenario 3b: High-priority landscape (Existing Landscape/Jurisdictional Initiative in place)



# Supporting Guidance

	SCENARIO		
	1. Concessions & associated producer groups	2. Independent concessions	3. Outside any known concession
<b>Prioritisation exercise</b>	Not applicable		FPC members should first conduct an individual prioritisation exercise to identify their highest priority sourcing origins for Scenario 3 ( <a href="#">see Annex</a> ). Short-term response (through application of this MRF) will then focus only on these high priority origins, based on Scenario 3a ( <a href="#">High-priority landscape with no existing landscape/jurisdictional initiative</a> ) and 3b ( <a href="#">High-priority landscape - Existing Landscape/ Jurisdictional Initiative in place</a> ) decision trees. For low priority origins annual trend monitoring is conducted.
<b>STEP 1 Alert verification &amp; check possible supply chain link</b>	Alert upheld if >1 ha of forest cleared (as defined in <a href="#">Minimum monitoring requirements</a> ), and the following criteria are met: <ul style="list-style-type: none"> <li>The alert is inside a concession/ management unit that is in FPC supply chain either directly or at the group<sup>1</sup> level</li> <li>“Non-compliant” clearance of HCS forest, HCV area or peatland in line with thresholds, base maps set out in monitoring guidance</li> <li>After 31 December 2021.</li> </ul>	Alert upheld if >1 ha of clearance of HCS forest, HCV area or peatland (as defined in <a href="#">Minimum monitoring requirements</a> ) inside an independent concession after 31 December 2021.  Individual monitoring providers also need to give an indication of the “potential” risk currently or in the future <sup>2</sup> for FFB trading link: <ul style="list-style-type: none"> <li>Where possible based on actual TTP/FFB trade intelligence – criteria/datasets TBC with providers.</li> <li>&lt;50 km from mill in FPC member supply base.</li> <li>Viable transport link, e.g. road or known FFB barge navigable river connection.</li> </ul>	Viable transport link, e.g. road or known FFB barge navigable river connection.  Alert upheld if >2 ha of clearance of HCS forest, HCV area or peatland (as defined in <a href="#">Minimum monitoring requirements</a> ) beyond concession “non-compliant” clearance in High-Priority Landscape and if potential future supply risk (following same procedure as per Scenario 2) after 31 December 2021.  If alert rejected (e.g. alert not linked to clearance for palm oil OR <2 ha) FPC company should inform supplier for due diligence of future sourcing.
<b>Step 1 Timeline</b>	<u>Monthly</u> submission to FPC members by monitoring providers.	<u>Monthly</u> submission to FPC members by monitoring providers.	<u>Quarterly</u> submission to FPC members by monitoring providers.

<sup>1</sup> The group definition agreed by the FPC is the RSPO's definition of corporate group , but with reference to the Accountability Framework Initiative’s corporate group definition on family control where the FPC will consider entities part of the same corporate group if BOTH of the following are met: (1) A company has evident influence over the decisions that an entity makes through family links and (2) Entities are owned or run by members of the same family.

<sup>2</sup> In most cases, when independent concessions are developing land, it will be a new greenfield site and they will not be producing FFB yet. Therefore, monitoring providers would need to evaluate if there is a potential future risk it will enter the supply chain.

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<b>STEP 2 Grievance investigation &amp; assignment</b>	<p>Upheld alerts move to Step 2 and become the subject of a grievance investigation to confirm that the criteria in Step 1 are met and to collect information that will inform actions under Steps 3 and 4.</p> <p>To simplify data collection FPC members can use the MRF grievance investigation template (<a href="#">please refer to Annex</a>) during the grievance investigation process with Tier 1s.</p> <p>The template asks relevant questions, including:</p> <ol style="list-style-type: none"> <li>Who did clearance (e.g. company, other company or community)? Provide proof/evidence.</li> <li>Confirm details of clearance, including hectares, dates of clearance, crop planted (if possible) and confirm type of vegetation cleared (e.g. HCV etc.) if not already confirmed in Step 1.</li> </ol>		
	<p>Note that clearance for non-palm or by 3<sup>rd</sup> parties (e.g., community or SMEs) inside a Scenario 1 concession is considered valid grievance but recovery/response may differ, e.g.:</p> <ul style="list-style-type: none"> <li>FPC applies a “whole farm approach” if producers are growing multiple commodities on the same farm/ management unit from which the FPC member is sourcing, (i.e., if the company only sources palm oil from the producer but they deforest for rubber this is considered non-compliant deforestation).</li> <li>If deforestation in the producer’s concession was by a 3<sup>rd</sup> party (e.g., local community), response will take into account the need for FPIC and root cause analysis.</li> </ul> <p>In instances where sourcing boundary data cannot be shared due to commercial confidentiality, the Tier 1 should be responsible for providing a written statement to individual FPC members confirming which company/supplier/actor is responsible for clearance and confirming necessary ownership information to link the grievance holder to the grievance.</p>	<p>The same criteria apply as in Scenario 1, except where there is currently no link between a concession company and any FPC supply base. In this case the risk that product from the cleared area might enter an FPC company supply chain at some point in the future must be considered (refer to <a href="#">Minimum monitoring requirements</a>):</p> <ol style="list-style-type: none"> <li>Mill sources FFB from 3<sup>rd</sup> parties, and lacks full TTP and adequate onboarding protocol [expected only to be obtainable via SC engagement].</li> <li>&lt;50 km from mill in FPC member supply base.</li> <li>Viable transport link, e.g. road or known FFB barge navigable river connection.</li> </ol>	
<b>Step 2 Timeline</b>	6 weeks	2 months	3 months



## Forest Positive Coalition Monitoring and Response Framework

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<b>STEP 3</b> <b>Medium-term Response</b>	The short-term response should seek to ensure that the grievance holder recognizes the issues and adopts immediate actions to prevent any further damage. Individual FPC companies set their own sourcing expectations and make their own sourcing decisions for their Tier 1 suppliers linked to deforestation alerts.		
	<p>Individual FPC companies should consider the following possible actions when developing their own approach:</p> <ol style="list-style-type: none"> <li>1. Tier 1s set clear publicly communicated sourcing expectations AND timeline for their suppliers that will be triggered if deforestation or peat grievances occur.</li> <li>2. Tier 1 sourcing expectations are to be applied at producer group level, and across Tier 1 entire supply chain</li> <li>3. Tier 1s include contract clauses on sourcing expectations in supplier contracts</li> <li>4. Sourcing expectations clearly specify timelines for: <ul style="list-style-type: none"> <li>• When initial sourcing expectations are triggered (e.g. point of verified grievance, if supplier refuses to implement a SWO).</li> <li>• When the sourcing expectations could be lifted.</li> <li>• Ongoing monitoring (consistent with FPC MRF).</li> </ul> </li> <li>5. Sourcing expectations could also include the following options: <ul style="list-style-type: none"> <li>• Suspension of supplier group at point of verified grievance and until short term Action Plan expectations are met (<a href="#">as set out in Step 3c</a>).</li> <li>• No buy or reduction in purchased volumes from supplier group in next contract cycle triggered if short term Action Plan expectations as set out in Step 3c are not met.</li> <li>• Change of contract conditions in next contract cycle if short term Action Plan expectations as set out in Step 3c are not met.</li> </ul> </li> </ol>	<p>Individual FPC companies should consider the following principles when developing their approach:</p> <ul style="list-style-type: none"> <li>• If there is an LJC (Landscape or Jurisdictional Coalition), FPC members should follow already existing response protocols (e.g. RADD)</li> <li>• FPC members to decide whether sourcing expectations apply when there is a future risk but not currently supplying FFB.</li> <li>• Engaging with independent concessions that are not yet producing FFB is challenging as supply mills typically have no trade relationship or mandate to engage. Therefore, where LJC's do not exist, FPC company should propose that T1s engage proactively with mills and government to explore options for communicating with and monitoring of new independent concession developments.</li> <li>• If independent concession owner not engaged, then Tier 1s should provide a written statement committing to agreed safeguards against future non-compliance, for example, not selling any FFB coming from such concession to FPC members until individual company expectations met.</li> </ul>	<p>Individual FPC companies should consider the following proactive principles to managing Independent Smallholder (ISH) grievances with their suppliers:</p> <ul style="list-style-type: none"> <li>• ISH deforestation response is focused only on high priority landscapes.</li> <li>• Deforestation response for ISHs starts from engagement and capacity building, with grievance management only after farmers have been engaged, and with differentiated expectations depending on level of engagement.</li> <li>• T1 and/or T2 suppliers should have programmes/ systems to proactively engage their ISHs suppliers on NDPE in High Priority origins/landscapes.</li> <li>• FPC members will explore possibility of supporting smallholder/community engagement or landscape programmes (as part of wider coalitions or B2B together with T1 supplier and/or closest mills) in high priority landscapes that support smallholder livelihoods and capacity building combined with grievance response systems that address root causes of deforestation whilst also providing 3<sup>rd</sup> party FFB Due Diligence.</li> <li>• Response and recovery must not undermine smallholder livelihoods.</li> <li>• If ISH not engaged, then Tier 1s should provide a written statement committing to agreed safeguards against future non-compliance, for example, not selling any FFB coming from such concession to FPC members until individual company expectations met.</li> </ul>

## Forest Positive Coalition Monitoring and Response Framework

	SCENARIO		
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	<p>FPC members should individually assess Action Plans against the following possible actions, which were developed based on Tier 1s existing protocols, CGF FPC discussion and feedback from a wide range of stakeholders:</p> <ol style="list-style-type: none"> <li>Possible actions for <b>Grievance holder</b>: <ul style="list-style-type: none"> <li>In the <b>short term</b> (Step 3): <ul style="list-style-type: none"> <li>Implement SWO<sup>3</sup> (<a href="#">see Step 3a</a>).</li> <li>Calculate &amp; acknowledge publicly area of non-compliant clearance since 31 December 2015. Summary of how liability calculated should be provided on request (including who did analysis, land use change maps provided).</li> <li>Commit publicly to developing recovery plan for addressing non-compliant clearance (<a href="#">see Step 4 criteria</a>).</li> <li>Commit to bi-annual, public progress reports.</li> </ul> </li> <li>In the <b>medium term</b> (Step 4): <ul style="list-style-type: none"> <li>Develop recovery plan for addressing non-compliant clearance (<a href="#">see Step 4 criteria</a>) and publish public summary on website. Recovery plan must cover full liability &amp; if “off-site”<sup>4</sup> be with a trusted implementation organization.</li> <li>Carry out an HCV-HCS assessment in line with HCSA and HCVRN requirements to identify HCV areas and HCS forests within the grievance holder management unit<sup>5</sup>.</li> </ul> </li> </ul></li></ol>	<p>Individual FPC companies should also consider the following possible actions (assume consistency with Scenario 1 considering what is realistic to be implemented for independent concessions) when developing their own approach:</p> <ol style="list-style-type: none"> <li>If <b>Illegal clearance</b> (e.g., forest estate or Protected Area), <a href="#">please refer to Step 3a</a>. The guiding principle should be resolving the legality first and then meet FPC expectations (solving the legality alone does not meet FPC expectations): <ul style="list-style-type: none"> <li>Stop Work Order (SWO) in relevant concession.</li> <li>Action Plan: <ul style="list-style-type: none"> <li>Commit to NDPE.</li> <li>Calculate &amp; publicly acknowledge area of non-compliant clearance after 31 December 2021.</li> <li>Commit publicly to developing a recovery plan for addressing non-compliant clearance.</li> </ul> </li> </ul> </li> <li>If <b>legal clearance</b> (e.g., APL, HPK, <a href="#">see List of Acronyms and Abbreviations</a>), <a href="#">please refer to Step 3b</a>: <ul style="list-style-type: none"> <li>Stop Work Order (SWO) in relevant concession.</li> <li>Action Plan: <ul style="list-style-type: none"> <li>Commit to NDPE</li> <li>Calculate &amp; publicly acknowledge area of non-compliant clearance after 31 December 2021.</li> <li>If clearance &gt;50 ha OR concession &gt;100 ha, commit publicly to developing and implementing a recovery plan for addressing non-</li> </ul> </li> </ul> </li> </ol>	<p>Individual FPC companies should also consider the following possible actions (considering what is realistic to be implemented for ISH) when developing their own approach:</p> <ol style="list-style-type: none"> <li>If <b>Independent Smallholder (ISH) AND already engaged/ aware of NDP requirements</b> (<a href="#">please refer to Step 3a</a>): <ul style="list-style-type: none"> <li>Stop Work Order (SWO) in relevant farm/plot.</li> <li>Action Plan<sup>6</sup>: <ul style="list-style-type: none"> <li>Acknowledge approximate area of non-compliant clearance (self-disclosure).</li> <li>Commit to developing or supporting a simplified &amp; community or farmer group level recovery plan for addressing non-compliant clearance<sup>7</sup>, e.g., to restore buffer zones to legal minimum &amp; rehabilitate forest after planting cycle.</li> </ul> </li> </ul> </li> </ol>

<sup>3</sup> This is defined as stopping all land clearance, preparation or planting activities (including terracing, salvage logging, canal digging, etc.) OR commit to protecting remaining undeveloped forest in farm/plot.

<sup>4</sup> In some cases, grievance holder might choose to implement a recovery project outside of the supplier site(s).

<sup>5</sup> Significant time is required to complete an HCV-HCS assessment and ALS review, therefore, these actions are expected to exceed the main MRF timelines.

<sup>6</sup> NB Expectations for an Action Plan appropriate to NDP policy adherence by ISHs will be very different to Scenarios 1 & 2.

<sup>7</sup> Criteria for ISH recovery requires further industry discussion. FPC members may explore the possibility of allocating funds to support ISH meet their recovery expectations.

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	SCENARIO		
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	<p>And possible actions at the <b>Group level</b>:</p> <p>3. In the <b>medium term</b> (Step 4):</p> <ul style="list-style-type: none"> <li>○ Commit to and publish on website NDPE policy and time-bound plan,</li> <li>○ Develop grievance mechanism,</li> <li>○ New SOPs for land clearing and community engagement, etc.</li> </ul> <p><b>Other general principles for action:</b></p> <ul style="list-style-type: none"> <li>• If 3<sup>rd</sup> party encroachment (e.g., encroachment is validated as due to local community or other companies deforesting in a concession) Action Plan may differ. For community clearance, the concession owner must engage in line with FPIC and resolution should follow best practice in grievance resolution following UNGPs.</li> </ul>	<p>compliant clearance (refer to Step 4 for further information).</p> <p><b>Other general principles for action:</b></p> <ul style="list-style-type: none"> <li>• If repeat offenders, FPC members may consider requiring a stronger grievance response (e.g., expect remedial actions even if clearance &lt;50 ha) if ind. concession FFB will enter FPC supply chains.</li> <li>• If independent concessions are not yet producing FFB and never previously engaged on NDPE, action plans and recovery for legal clearance may need to consider industry level support and/or flexibility for off-site compensation options.</li> </ul>	<p>2. If <b>illegal clearance by ISH NOT yet engaged/aware</b> (<a href="#">please refer to Step 3b</a>), the guiding principle should be resolving the legality first and then meet FPC expectations (solving the legality alone does not meet FPC expectations):</p> <ul style="list-style-type: none"> <li>• Stop Work Order (SWO) in relevant farm/plot.</li> <li>• Action Plan: <ul style="list-style-type: none"> <li>○ If available, commit to participating in smallholder programme.</li> <li>○ Agree to comply with legal requirements for relocation/recovery.</li> </ul> </li> </ul> <p>3. If <b>legal clearance by ISH not yet aware/engaged</b> (<a href="#">please refer to Step 3c</a>):</p> <ul style="list-style-type: none"> <li>• Stop Work Order (SWO) in relevant farm/plot.</li> <li>• Action Plan: <ul style="list-style-type: none"> <li>○ If available, commit to participating in smallholder programme</li> </ul> </li> </ul>
<b>Step 3 Timeline</b>	2.5 months	5 months	6 months



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	1. Concessions & associated producer groups	2. Independent concessions	3. Outside any known concession
<b>STEP 4: Medium term response, corrective action &amp; monitoring</b>	The medium-term response should seek to ensure the delivery of actions by the grievance holder that directly address the grievance and strengthen their ability to prevent future non-compliance. FPC members should individually assess Action/Recovery plans (if applicable) against the following possible actions and steps developed based on Tier 1s existing protocols, CGF FPC discussion and feedback from a wide range of stakeholders:		
	<ol style="list-style-type: none"> <li>Liability calculation (back to 31 December 2015) based on a transparent methodology.</li> <li>Commitment to recovery plan development.</li> <li>Development of recovery plan. Recovery plans would be expected to consider: <ul style="list-style-type: none"> <li>Contracting of external technical expertise (if needed).</li> <li>Review of corporate SOPs.</li> <li>Measures to maintain good working relationships with relevant stakeholder groups.</li> <li>Human resource allocation and corporate structure.</li> </ul> </li> <li>Implementation</li> <li>Monitoring</li> <li>Local government engagement and other enabling stakeholders as blended finance likely needed.</li> <li>Clear timelines for each step in recovery process, including monitoring and for any phased implementation.</li> </ol> <p>Specific principles that FPC members may consider for on- and off-site remediation of deforestation/peat clearance include:</p> <ol style="list-style-type: none"> <li><b>Additional:</b> e.g., the area being protected or restored should add to any existing planned, funded or required activities (e.g., already identified HCV/HCS not suitable).</li> <li><b>Equivalent:</b> <ol style="list-style-type: none"> <li>Ha-for-ha, \$ equivalent (consistent with RSPO) or other clear criteria for defining conservation outcomes.</li> <li>Geographic proximity, unless clear exceptions e.g., lack of suitable on-the-ground partners.</li> </ol> </li> </ol>	<ol style="list-style-type: none"> <li>Rapid liability calculation to 31 December 2021 (e.g. by monitoring provider or using tools like Global Forest Watch). If needed Tier 1s support to conduct rapid liability calculation.</li> <li>For all growers: written evidence of a SWO and commitment and/or SOP to protect remaining undeveloped forest in concession.</li> <li>FPC companies should consider additional recovery expectations based on scale of clearance/size of grower: <ul style="list-style-type: none"> <li>If <b>50-500 ha forest clearance OR concession is 100 – 1000 ha total size</b>, then jointly agree within 1 year on an environmental &amp; social project for supplier to support.</li> <li>If <b>&gt;500 ha forest clearance OR concession is &gt;1000 ha total size</b>, then recovery expectations as per Scenario 1.</li> </ul> </li> </ol>	<p>If <b>Independent Smallholder AND already engaged/aware of NDPE</b> requirements:</p> <ul style="list-style-type: none"> <li>Written evidence of a SWO OR written commitment to protect remaining forest.</li> <li>Implement community or farmer group level recovery plan (scope TBC as outlined in Step 3).</li> </ul> <p>If <b>illegal clearance by ISH not yet engaged aware:</b></p> <ul style="list-style-type: none"> <li>Written evidence of a SWO OR written commitment to protect remaining forest.</li> <li>Comply with legal requirements for relocation/recovery.</li> </ul> <p>If <b>legal clearance by ISH not yet engaged/aware:</b></p> <ul style="list-style-type: none"> <li>Written evidence of a SWO OR written commitment to protect remaining forest.</li> </ul>

Forest Positive Coalition Monitoring and Response Framework

	SCENARIO		
	1. Concessions & associated producer groups	2. Independent concessions	3. Outside any known concession
	3. <b>Equitable:</b> evidence of FPIC (consistent with RSPO guidance). 4. <b>Long-lasting:</b> at least 25 years. 5. <b>Knowledge-based:</b> based on previous recovery cases from the RSPO RACP, other NDPE recovery cases, scientific literature or other restoration projects).		
STEP 4 Timeline	1 year to finish		

# Minimum Monitoring Requirements

## Background

The “Minimum Requirements” (MRs) have been developed to complement the Response Framework to improve consistency of the monitoring information on deforestation and peat alerts used by FPC companies, and to therefore ultimately streamline response. Primary users of the MRs are anticipated to be deforestation monitoring service providers, but they should also provide a useful reference for other stakeholders by providing greater clarity on key thresholds and timelines for defining and reporting data on deforestation and peat clearance grievances.

## Minimum Requirements

Response Framework Steps	Attributes/minimum requirements		
	SCENARIO 1 (Concessions and associated producer group)	SCENARIO 2 (Independent concessions)	SCENARIO 3 (Outside concessions)
Step 1	<p><b>1. Technical (cross-cutting for all scenarios)</b></p> <p>1.1 Up to date and accurate base maps to verify credibility &amp; assess non-compliance:</p> <p>1.1.1 Forest base maps:</p> <p>1.1.1.1 Spatial resolution ≤30 meters. Where possible following the HCSA toolkit expectations of forest mapped based on raw satellite imagery of &lt;10m and with &lt;5% cloud cover<sup>8</sup>.</p> <p>1.1.1.2 Annually updated.</p> <p>1.1.1.3 &gt;80% accuracy, following <a href="#">GOFC GOLD guidelines</a> for estimating uncertainty (section 2.7) and explaining accuracy assessment protocol.</p> <p>1.1.1.4 Preference for HCSA forest definition or if not, definition parameters clearly explained: e.g., canopy cover, tree height, etc., and/or forest definition used indicated (e.g. FAO, national definitions).</p> <p>1.1.1.5 Indicative or proxy HCV map included where not already identified through site level HCV or HCV-HCSA assessment.</p> <p>1.1.2 Peat base maps:</p> <p>1.1.2.1 Spatial resolution ≤30 meters.</p> <p>1.1.2.2 Based on best available data (combination of remote and field data). Recommended remote data should combine the following: Wetlands International; government datasets: Malaysia: JUPEM or relevant Sabah/Sarawak agencies; Indonesia: Min Agric.</p> <p>1.1.2.3 Where relevant legally protected peat should be mapped (e.g. in Indonesia for &gt;3m deep peat/peat moratorium areas).</p> <p>1.1.2.4 Protocol for verifying peat map accuracy and updating peat base maps clearly explained (aligned with <a href="#">GOFC GOLD guidelines</a> for estimating uncertainty (section 2.7)), and confidence level provided, in line with following guidance:</p> <p>1.1.2.4.1 High: Based on site-level soil surveys with evidence provided (e.g. reported by grower or verified by 3<sup>rd</sup> party).</p> <p>1.1.2.4.2 Medium: Based on site-level self-declaration but no evidence provided, OR remote data with a transparent remote accuracy assessment protocol.</p> <p>1.1.2.4.3 Low: Remote data without transparent accuracy assessment protocol.</p>		

<sup>8</sup> Note: the HCSA toolkit is designed for site level application not wall-to-wall national/landscape mapping where higher specifications may not be feasible

## Forest Positive Coalition Monitoring and Response Framework

Response Framework Steps	Attributes/minimum requirements		
	SCENARIO 1 (Concessions and associated producer group)	SCENARIO 2 (Independent concessions)	SCENARIO 3 (Outside concessions)
	<p>1.1.2.5 <i>Required for new plantings:</i> if remote/national peat maps indicate peat presence it is assumed present, any differences from remote maps must be supported by evidence from field soil/peat survey (accuracy &gt;80% and following best practice for peat surveys according to RSPO<sup>9</sup> and with peat defined as per RSPO definition<sup>10</sup>).</p> <p>1.1.3 Publicly available data on HCV areas (RSPO/ALS), HCS forest (HCSA/ALS) and community land.</p> <p>1.1.4 Other zoning maps, e.g., planting plans.</p>		
	<p><b>2. Technical (Scenario 1 only):</b></p> <p>2.1 Accuracy level:</p> <p>2.1.1 Deforestation: 1 ha of non-compliance within concession (if &lt;1ha, it will not be reported to end users). Confidence level/accuracy: &gt;80% that forest was cleared, following <a href="#">GOFC Gold Handbook</a>, section 2.7) and clearly specifying if any ground verification has been conducted.</p> <p>2.1.2 Fire: data sources clearly communicated. Alerts using “raw” satellite alerts (e.g., from VIRS) provide confidence level, and where possible verification based on high-res imagery, fire scars or ground-truth.</p> <p>2.1.3 If any other prioritization or ranking is conducted, methodology is clearly explained (e.g., using HCSA High Priority Patches / core areas).</p> <p><b>3. Integration and verification of third-party alerts/reports.</b></p> <p><b>4. Frequency of summary deforestation reports:</b> monthly.</p> <p><b>5. Accurate and up-to-date supply chain &amp; ownership intel:</b></p> <p>5.1 Concession boundary accuracy:</p> <p>5.1.1 Minimum up to date as of 31<sup>st</sup> December 2018, and ideally updated for new concessions on a yearly basis.</p> <p>5.1.2 Includes land bank and planted/unplanted status.</p> <p>5.1.3 Sources (self-reporting, gov agency etc.) and type (e.g. HGU, IL, temporary land title) of boundary summarized.</p>	<p><b>2. Technical (Scenario 2 only):</b></p> <p>2.1 Accuracy level:</p> <p>2.1.1. Deforestation: 1 ha of non-compliance in independent concession without known link to existing mills (if &lt;1ha, it will not be reported to end users). Confidence level/accuracy: &gt;80% that forest was cleared, following <a href="#">GOFC Gold guidance</a> for estimating uncertainties (GOFC GOLC Handbook, section 2.7) and clearly specifying if any ground verification has been conducted.</p> <p>2.1.2. Fire: data sources clearly communicated. Alerts using “raw” satellite alerts (e.g., from VIRS) provide confidence level, and where possible verification based on high-res imagery, fire scars or ground-truth.</p> <p>2.1.3. If any other prioritization or ranking is conducted, methodology is clearly explained (e.g., using HCSA High Priority Patches / core areas).</p> <p><b>3. Integration and verification of third-party alerts.</b></p> <p><b>4. Frequency of summary deforestation reports:</b> monthly.</p> <p><b>5. Accurate and up-to-date supply chain &amp; ownership intel:</b></p> <p>5.1. Concession boundary accuracy:</p> <p>5.1.1. Minimum up to date as of 31<sup>st</sup> December 2018, and ideally updated for new concessions on a yearly basis.</p> <p>5.1.2. Includes land bank and planted/unplanted status.</p>	<p>Follow prioritization of low/high priority landscapes as per MRF Scenario 3 (<i>Draft requiring further discussion and testing</i>) – <b>MRs listed below apply only within high priority landscapes.</b></p> <p><b>2. Technical (Scenario 3 only):</b></p> <p>2.1 Accuracy level:</p> <p>2.1.1 Deforestation: ≥2<sup>13</sup> ha of non-compliance outside concession (if &lt;2 ha, it will not be reported to end users). Confidence level: &gt;80% that forest was cleared.</p> <p>2.1.2 Monitoring providers to rank these alerts and clearly explain methodology (e.g., using HCSA High Priority Patches, proximity to mill, summarized at village level etc.).</p> <p>2.2 Deforestation driver (crop type, fire history), other intel on land type/status (e.g., APL, HP etc. in Indonesia).</p> <p><b>3. Integration and verification of third-party alerts.</b></p> <p><b>4. Frequency of summary deforestation reports:</b> quarterly.</p> <p><b>5. Supply chain &amp; ownership intel:</b></p> <p>5.1 Ownership status (if available) or relevant administrative boundary that enables engagement with an actor with some mandate for land management (i.e., village or mukim name, dealers or community name etc.).</p> <p>5.2 Source and confidence in TTP linkages (e.g. link from smallholder group/dealer to mill) must be provided, clearly stating if based on actual FFB trade data (self-</p>

<sup>9</sup> <https://rspo.org/resources/peat>

<sup>10</sup> <https://rspo.org/principles-and-criteria-review/revision-of-rspo-organic-and-peat-soil-classification>

<sup>13</sup> Alert threshold consistent with Radar Alerts for Detecting Deforestation (RADD) Protocol



## Forest Positive Coalition Monitoring and Response Framework

Response Framework Steps	Attributes/minimum requirements		
	SCENARIO 1 (Concessions and associated producer group)	SCENARIO 2 (Independent concessions)	SCENARIO 3 (Outside concessions)
	<p>5.1.4 Protocol for verifying concession boundary accuracy clearly explained (aligned with GOFC GOLD guidelines for estimating uncertainty (section 2.7)), e.g. verification by concession owner, <u>using systematic review/judgments by local experts or comparison with other spatial or non-spatial data. Monitoring providers should have a logbook of changes.</u></p> <p>5.1.5 Confidence level must be provided, in line with following guidance:</p> <p>5.1.5.1 High: self-reported by concession owner with supporting evidence and/or verified by other ground-verification process (may include verification with local government agency or against recognized cadastre). In Indonesia boundary needed when land developed (before HGU), in Malaysia temporary land title.</p> <p>5.1.5.2 Medium: based on official government boundaries from relevant local/sub-national agency but without confirmation from grower or ground verification.</p> <p>5.1.5.3 Low: based on publicly available or unofficial datasets without any confirmation from grower or ground verification.</p> <p>5.2 Ownership status (including group)</p> <p>5.2.1 Concession ownership (including group) stated and source provided with evidence where possible (e.g. self-reported, official government sources, stock market records etc.).</p> <p>5.2.2 Concession ownership status expected for &gt;95% of group-owned concessions OR confidence level in ownership to be reported (following 4.1.5 for boundary confidence).</p> <p>5.2.3 Group definition clearly explained or following CGF definition as specified in MRF (building off RSPO and AFi definitions).</p> <p>5.2.4 Mill ownership updated bi-annually as per UML process<sup>11</sup> (sources summarized &amp; verification process explained).</p>	<p>5.1.3. Sources (self-reporting, gov agency etc.) and type (e.g. HGU, IL, temporary land title) of boundary summarized.</p> <p>5.1.4. Protocol for verifying concession boundary accuracy clearly explained (aligned with GOFC GOLD guidelines for estimating uncertainty (section 2.7)), e.g. verification by concession owner, <u>using systematic review/judgments by local experts or comparison with other spatial or non-spatial data. Monitoring providers should have a logbook of changes.</u></p> <p>5.1.5. Confidence level must be provided, in line with following guidance:</p> <p>5.1.5.1. High: self-reported by concession owner with supporting evidence and/or verified by other ground-verification process (may include verification with local government agency or against recognized cadastre). In Indonesia boundary needed when land developed (before HGU), in Malaysia temporary land title.</p> <p>5.1.5.2. Medium: based on official government boundaries from relevant local/sub-national agency but without confirmation from grower or ground verification.</p> <p>5.1.5.3. Low: based on publicly available or unofficial datasets without any confirmation from grower or ground verification.</p> <p>5.2. Ownership status (i.e., name of independent company):</p> <p>5.2.1. Concession ownership stated and source provided with evidence where possible (e.g. self-reported, official government sources, stock market records etc.; following 4.1.5 for boundary confidence).</p> <p>5.2.2. Concession ownership status expected for &gt;75% of independent concessions.</p> <p>5.3. Traceability to Plantation/Supply chain linkages to mills, refiners and traders:</p>	<p>reported by mill = high confidence) or potential link based on risk-assessment or other proxies (medium/low confidence). Recommend use of emerging industry tools such as risk-based / "Risk-calibrated traceability (RCA TTP)".</p>

<sup>11</sup> CGF POWG members, consulted supply chain companies and monitoring providers agreed to actively supporting WRI with strengthening the Universal Mill List

## Forest Positive Coalition Monitoring and Response Framework

Response Framework Steps	Attributes/minimum requirements		
	SCENARIO 1 (Concessions and associated producer group)	SCENARIO 2 (Independent concessions)	SCENARIO 3 (Outside concessions)
	<p>5.3 Traceability to Plantation/Supply chain linkages to (mills) refiners and traders – actionable and useful summary.</p> <p>5.4 Future risk related to land bank (e.g., undeveloped status, permit submission processes etc.).</p>	<p>5.3.1. Source and confidence in TTP linkages (e.g. link from independent concession to mill) must be provided, clearly stating if based on actual FFB trade data (self-reported by mill = high confidence) or potential link based on risk-assessment or other proxies (medium/low confidence<sup>12</sup>).</p> <p>5.3.2. If only “potential link”, methods used for defining risk or probability of supply link must be provided (e.g., viable transport link, potential trade link (&amp; predictive capability)).</p> <p>5.3.3. For new developments, the risk of potential future supply link must also be provided &amp; methodology explained (may be the same as for above bullet).</p>	
Step 2	<p><b>1. Grievance investigation</b></p> <p>1.1 FPC members engage Tier 1s to identify existing grievance investigation or undertake one. Where possible, monitoring providers provide additional verification information on:</p> <p>1.1.1 Who did clearance &amp; proof?</p> <p>1.1.2 Area cleared</p> <p>1.1.3 Timelines</p> <p>1.1.4 Info on crop to be planted</p>	<p><b>1. Grievance investigation</b></p> <p>1.1 Expect lower confidence than in Scenario 1. FPC members engage Tier 1s to identify existing grievance investigation or undertake one. Where possible, monitoring providers provide additional verification information on:</p> <p>1.1.1 Who did clearance &amp; proof?</p> <p>1.1.2 Area cleared</p> <p>1.1.3 Timelines</p> <p>1.1.4 Info on crop to be planted</p> <p>1.2 If there is currently no link between grievance holder and any FPC supply base, monitoring providers should assess the potential future risk that FFB from the cleared area might enter an FPC company supply chain at some point in the future: Where possible, monitoring providers provide additional verification information on:</p> <p>1.2.1 Where possible based on actual TTP/FFB trade intelligence.</p> <p>1.2.2 &lt;50km from mill in FPC member supply base.</p> <p>1.2.3 Viable transport link, e.g. road or known FFB barge navigable river connection.</p>	
Steps 3 & 4	<p><b>1. Monitoring &amp; verification:</b> Providers continue monitoring concession<sup>14</sup> If deforestation non-compliance not addressed, feeds back into MRF Step 1.</p> <p>Optional extra of case monitoring for more in-depth grievance tracking (e.g., medium term responses and corrective actions inside the concession).</p>		<p><b>1. Monitoring &amp; verification:</b> Need to develop appropriate monitoring protocol linked to longer term engagement/smallholder programmes or as part of Landscape Coalitions.</p>

<sup>12</sup> Through the Monitoring and Response Framework dialogue/pilots, CGF POWG to engage with supply chain to develop and test (e.g. within landscape/jurisdictional initiatives) a process to move from risk to actual TTP data (with CGF member existing or new co-funding) whilst ensuring respect for commercial sensitive sourcing data.

<sup>14</sup> Monitoring of short-term responses – stop work orders linked to DF alerts. Service providers might also monitor the cessation of sourcing where this has been deemed appropriate i.e., supply chain links.

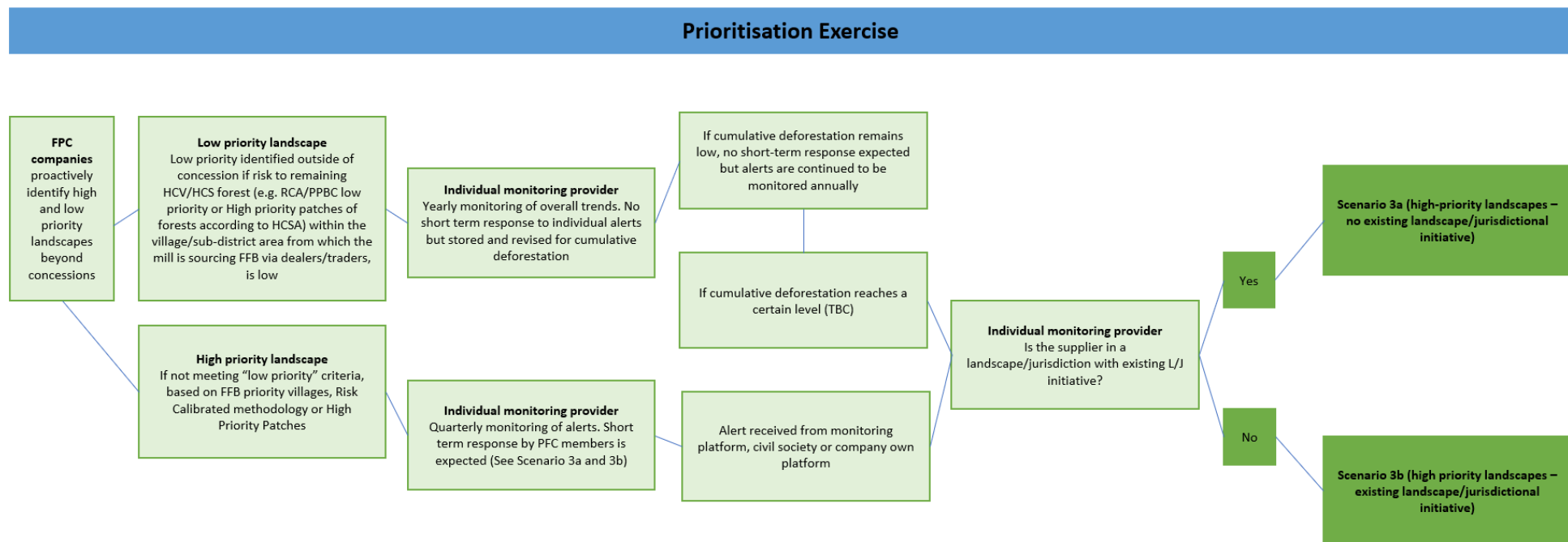
## Forest Positive Coalition Monitoring and Response Framework

The table above captures the “core” information required for FPC members to apply the Response Framework and take action under the three scenarios outlined. In addition to this “core” information, the FPC has identified several additional, cross-cutting outputs that are not considered essential for the Response Framework, but that may be useful additional data and analyses that deforestation monitoring service providers could consider offering to user companies:

1. Option for “Emergency” reporting/alerts where required (e.g., massive deforestation event, for instance even threshold for Scenario 1 could be >50 ha clearance in 1-2 weeks).
2. VDF reporting: based on pulling together results of 3 Scenarios and transparency about assumptions made (e.g., on traceability, risk proxies etc). Additional dialogue may be needed to define/agree specific criteria.
3. Retrospective land-use change to assess past clearance since 31 December 2015 (Spatial resolution  $\leq 30$  meters) – used for MRF Step 4 liability assessment.
4. Annual accuracy summary based on accuracy assessment reporting %/frequency of false positives and false negatives.
5. Case reporting.
6. Concession/mill performance data to inform recovery plan expectations/avenues, e.g., certification status or other NDPE progress reporting.
7. Public summary reports on deforestation alerts/cases (including periodic summary of other “non-palm” drivers to contextualise the alerts).

# Annex

## Annex A: Scenario 3 – Prioritisation Exercise





## Annex B: Grievance Investigation Template

Date FPC company communicated grievance to T1 supplier	
Has T1 supplier or other stakeholder (e.g., government body or LJC) already initiated action?	Yes/No. If yes, please provide details, and if other stakeholder initiated action please state who
Grievance subject (e.g., concessionaire/group, community, etc.)	
Field verification	Yes/No
	<i>*If yes please provide evidence of verification and/or summary of verification protocol</i>
List of suppliers between grievance subject and T1 supplier. If alert is related to grower who is not yet producing FFB or not supplying to FPC company supply chain, then determine (via monitoring provider) whether there is a potential future risk according to MRF criteria under step 2.	
<b>Detailed grievance information (may be provided by grievance subject)</b>	
Date grievance was communicated to grievance subject or other local stakeholder responsible for response/verification (e.g., government body or LJC)	NA
Does the grievance subject acknowledge the grievance?	Yes/No
	Please provide any additional information below. For example, if grievance subject claims not related to alert, please provide supporting evidence
Date of clearance	
Land/Concession owner	
Responsible party for land clearance <i>*Please provide proof/evidence (e.g., group, company, community)</i>	Please provide any additional information below:
Confirm number of hectares cleared <i>*If different from FPC company, please provide proof/evidence</i>	Please provide any additional information below:
Confirm type of vegetation cleared	
Crop planted	
If any response or remedy action already in place, please confirm details of activities and implementation status here	Yes/No. Add details (if response/action plan in place)
Deadline to report back to T1 supplier	

## Annex C. List of Abbreviations and Acronyms

<b>AFi</b>	Accountability Framework Initiative
<b>APL</b>	Areal Penggunaan Lain
<b>DD</b>	Due Diligence
<b>FFB</b>	Fresh Fruit Bunches
<b>FPC</b>	Forest Positive Coalition
<b>FPIC</b>	Free, Prior and Informed Consent
<b>GM</b>	Grievance Manager
<b>HCS</b>	High Carbon Stock
<b>HCV</b>	High Conservation Value
<b>HPK</b>	Hutan Produksi yang dapat Dikonversi
<b>ISH</b>	Independent Smallholder
<b>LJC</b>	Landscape or Jurisdictional Coalition
<b>MRs</b>	Minimum Requirements Monitoring Guidance
<b>NDP</b>	No Deforestation or Development on Peatland
<b>POCG</b>	Palm Oil Collaboration Group
<b>RCA</b>	Risk Calibrated Approach
<b>MRF</b>	Monitoring & Response Framework
<b>RSPO</b>	Roundtable on Sustainable Palm Oil
<b>SME</b>	Small and Medium-sized Enterprises
<b>Tier 1s</b>	Upstream (Tier 1 actors)
<b>TTP</b>	Traceability to Plantation



An aerial photograph of a vast, dense palm forest. The palm trees are tightly packed, creating a textured green canopy. A narrow dirt road winds through the forest, and a small, dark-colored car is visible on the road, providing a sense of scale. The lighting is natural, highlighting the vibrant green of the palm fronds.

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