Strengthening the collection of palm oil supply chain traceability information in Indonesia

This brief has been developed in consultation with the Indonesian Sustainable Palm Oil (ISPO) Secretariat and technical staff from the Ministry of Agriculture, the Ministry of Industry and the Ministry of Trade. It builds on the ISPO-EFI Joint gap assessment of the EUDR information needs and information availability from the Indonesian Sustainable Palm Oil (ISPO) certification, which highlights the need for a palm oil supply chain traceability system to support ISPO certification.

Introduction

Supply chain traceability has become increasingly important as a means to support claims regarding the production of agricultural commodities, which has long been associated with deforestation and human and labour rights issues. Palm oil has been the subject of much global attention in this respect, and significant efforts have been made to minimise negative impacts associated with its production and trade to meet global market demands.

Voluntary certifications and company sustainability commitments have played an important role in improving standards of production in global agricultural commodity supply chains. Regulatory measures are now being more widely implemented in both producer and consumer countries to broaden the impacts achieved thus far. In the context of Indonesia-EU palm oil trade, the European Union Deforestation Regulation (EUDR) and the Indonesian Sustainable Palm Oil (ISPO) standards are of particular interest in this respect.

The EUDR requires commodities including palm oil that are placed on or exported from the EU market to be deforestation-free, and produced in accordance with relevant legislation of

the country of production. EU operators and traders will be responsible for submitting a statement confirming that due diligence has been carried out and that products are produced in accordance with the EUDR's legal and deforestation-free requirements[1]. To do this, traceability systems are needed to connect the product to the area of production and ensure that no mixing with other products has taken place.

In Indonesia, Presidential Regulation No. 44/2020 and Minister of Agriculture Regulation No. 38/2020 currently provide a regulatory basis for ISPO certification. Regulation 38/2020 includes a number of provisions on traceability under Principle 6, Application of Transparency that are meant to apply to the supply chain from the producer to the mill. Both regulations are currently being revised, while complementary regulations are being developed by other ministries to support palm oil supply chain traceability downstream of the mill.

This brief proposes provisions that could be considered in developing the abovementioned regulations, and a selection of supporting measures that could be considered by the Ministry of Trade. The provisions take into account implementation challenges of current regulations and requirements included in the EUDR – in particular, EU operators' requirements to collect geolocation information and other traceability information as part of the mandatory due diligence process. Data collection and storage responsibilities for each supply chain actor, and channels through which information could be submitted, are also considered. The spirit of the brief is not to inflate data reporting requirements for the industry; therefore, where possible, recommendations focus on improving data sharing across administrations without creating new obligations.

While potentially supporting EU market access for Indonesian palm oil, strengthened palm oil supply chain traceability could also facilitate export of palm oil to other global markets where similar regulations are being developed. Comparable regulatory measures could additionally be considered for other agricultural commodities produced in Indonesia that are within the scope of the EUDR and other global regulations, e.g. rubber, cocoa and coffee.

Palm oil certification and traceability in Indonesia

The main governmental provisions regarding palm oil traceability in Indonesia are linked to the ISPO national standard, which was launched in 2011. A revamp culminating in the issuance of Presidential Regulation No. 44/2020 and Minister of Agriculture Regulation No. 38/2020 sought to strengthen the implementation and effectiveness of the standard and to tackle issues including in relation to environmental and forest protection, documentation procedures and transparency. The ISPO certification scheme is now mandatory for companies and for smallholders, who will need to be certified by 2025. The standard regulates the palm oil supply chain from the area of production up to and including the palm oil mill.

[1] On 2 October 2024, the European Commission proposed an amendment to the EUDR, to give a 12-month extension of the date of entry into application to 30 December 2025, for larger companies and to 30 June 2026 for micro, small and medium enterprises. The amendment is subject to approval by the European Parliament and the Council of the European Union.

A revised Presidential Regulation is currently being developed and, following its issuance, a revised ministerial regulation is expected to be launched within a short timeframe. Additionally, a regulation is expected to be issued by the Ministry of Industry to regulate the palm oil supply chain from the mill to the port of export for food, feed and oleochemicals. Another regulation issued by the Ministry of Energy and Mineral Resources will perform a similar function for palm oil-derived biofuel.

In the current 2020 ISPO standard, there are seven principles, five of which apply to smallholders as outlined in Table 1 below.

Table 1. ISPO principles for companies and smallholders as described in Minister of Agriculture Regulation No. 38/2020.

Principle	Coverage	
	Companies (Annex 1)	**Smallholders (Annex 2)**
1. Compliance with legal regulations	✓	✓
2. Implementation of good plantation practices	✓	✓
3. Environmental management, natural resource, and biodiversity conservation	✓	✓
4. Labor responsibility	✓	Not applicable
5. Social responsibility and community empowerment	✓	Not applicable
6. Implementation of transparency	✓	✓
7. Sustainable business improvement	✓	✓

Traceability is included under principle six on transparency. The six transparency criteria are as follows:

1. Known Fresh Fruit Bunch (FFB) sources
2. Calculation of the K index and transparent supporting data[2]
3. Implementation of fair and transparent Fresh Fruit Bunches (FFB) pricing
4. Non-confidential information disclosure and complaint handling
5. Commitment to refrain from actions indicated as bribery
6. **Has a supply chain traceability system** (applicable to integrated palm oil plantation and processing companies and palm oil processing companies).

The specific requirements under principle six on traceability as detailed in annex of Ministry of Agriculture Regulation No. 38 of 2020 are presented in Annex 1. Supply chain actors can opt for either segregated or mass balance traceability, with different verifiers accordingly. The certification assessment is based on the presence of relevant documentation for most verifiers. Under criteria 6.6 (Has a Traceability Supply Chain System), verifier 6.9.2 refers to an "ISPO IT system", and notes that "When an ISPO IT system is available, transaction registration and reporting must be carried out in the IT system before delivery." At the time of publication of this brief, this IT system was not available to support ISPO traceability.

[2] For determining FFB price.

In its development, ISPO certification was conceived to apply not only to companies and smallholders managing palm oil plantations, but also to downstream actors as integral components within the supply chain. Ministry of Agriculture Regulation No. 38 of 2020 covers smallholder and company oil palm plantations, and supply chain actors up to the mills, but to extend traceability to downstream actors in support of full traceability from the point of export, further regulations need to be issued by ministries with administrative responsibility for relevant downstream supply chain actors. As noted above, for actors involved in food, feed and oleochemical supply chains, the Ministry of Industry is responsible. while for actors in biofuel supply chains, the Ministry of Energy and Mineral Resources is responsible.

EUDR information requirements related to traceability

The EUDR places restrictions on the import of commodities associated with deforestation, including palm oil. EU operators and traders are required to ensure that these products are not linked to deforestation after 31 December 2020. Under Article 9, operators are required to collect, organise and keep the following information, accompanied by evidence, relating to each relevant product:

1. a description of the product; the product description shall include the list of relevant commodities or relevant products contained therein or used to make those products;
2. the quantity of the relevant products;
3. the country of production and, where relevant, parts thereof;
4. the geolocation of all plots of land [polygons for > 4ha] where the commodities that the product contains, or has been made using, were produced, as well as the date or time range of production; where a product contains or has been made with commodities produced on different plots of land, the geolocation of all different plots of land shall be included;
5. the name, address and email of any business or person from whom they have been supplied with the products;
6. the name, address and email of any business, operator or trader to whom the products have been supplied;
7. verifiable information that the products are deforestation-free;
8. ffverifiable information that the commodities have been produced in accordance with the relevant legislation of the country of production, including any arrangement conferring the right to use the respective area for the purposes of the production of the commodity.

To meet these requirements and facilitate collection and transfer of information to EU operators, the forthcoming revised Ministry of Agriculture regulation on ISPO could be adapted to close gaps identified in the Joint Gap assessment of the EUDR information needs and information availability from the Malaysian Sustainable Palm Oil (MSPO) certification scheme. Regarding traceability, the following adaptations were recommended:

1. Accelerate establishment of an ISPO IT system as described in Regulation 38/2020.
2. Include functionality to record and transfer geolocation and other EUDR-relevant information to EU operators in an ISPO IT system.
3. Include a requirement in ISPO regulation/s for intermediaries (dealers/traders) to be certified, to facilitate collection and transfer of geolocation information for plots of land managed by independent smallholders.
4. Strengthen the ISPO Mass Balance supply chain model by requiring the collection of EUDR-relevant information for the non-ISPO certified component.

Other recommendations covered creation of links to SIPERIBUN and eSTD-B data platforms, inclusion of deforestation-free provisions aligned with the EUDR, and inclusion of indicators and verifiers regarding all areas of law within the scope of the EUDR.

The following section outlines how these recommendations could be accommodated in forthcoming regulations so that full traceability to the area of production of palm oil can be achieved through ISPO certification and other relevant systems.

Traceability provisions for consideration by Indonesian ministries

Ministry of Agriculture

The Ministry of Agriculture is responsible for regulating the palm oil supply chain from the plantation to the mill. In anticipation of increased global demand for legal and deforestation free products, the Ministry of Agriculture can implement regulations to support the provision of relevant information, such as will be required by EU operators and traders placing palm oil on the EU market.

Regulation No. 38/2020 on Indonesian Sustainable Palm Oil Plantation Certification already includes helpful information for operators seeking to meet EUDR requirements. Amongst other things, the ISPO certificate provides information on the name and address of the Business Entity; the location, coordinate points, plantation area, productivity and total production of the certified unit; and the supply chain model. Only coordinate points and not polygons are, however, required for plantations <25 ha, and to meet EUDR requirements, polygons would need to be collected for plantations >4 ha.

Assessment of supply chain certification under ISPO will only begin on 16 November 2025, when ISPO is required to be fully in force. Companies are allowed to choose between segregated or mass balance supply chain models. Under EUDR requirements, commodities placed on the EU market cannot be mixed with relevant products of unknown origin or produced in areas where deforestation or forest degradation has occurred after 31 December 2020. Therefore, ISPO-certified palm oil produced in areas that were not deforested after 2020 could not be mixed with and palm oil, either certified or uncertified, that does not meet all EUDR requirements. One way to meet these requirements would be to explicitly include a 2020 deforestation cut-off date in the ISPO regulation, and to ensure that it is implemented in fully segregated EU supply chains. For supply chains to the EU, the

deforestation cut-off date would also need to be based on the FAO-based EUDR forest definition[3].

Provisions for consideration by the Ministry of Agriculture:

1. Include under ISPO indicators 6.1.1 (SOP of mills for receiving FFBs) and 6.6.2 (purchase and sales transactions) a requirement for collection of geolocation coordinates for all company-managed plantations from which FFB have been supplied.
2. Include requirements for a supply chain traceability system for smallholders under Annex II Principle 4 – Application of Transparency, with requirements for collection of geolocation information.
3. Harmonise the Delivery Note template to allow identification of dealers serving as intermediaries in supplying FFB to palm oil mills. This step will help to close traceability gaps to farmers and ensure that the entire supply chain becomes traceable.
4. Consider the inclusion of a forest definition aligned with the FAO/EUDR forest definition and a deforestation cut-off date prior to 31 December 2020.
5. Consider restricting the application of the ISPO mass balance supply chain model only to sources verified as deforestation free (according to the FAO/EUDR definition), hence not allowing the application of mass balance accounting when mixing FFB sources not verified for deforestation.
6. Require supply chain actors including ISPO Certification Bodies to submit information specified under Article 9 of the EUDR and transaction information to the National Dashboard of Sustainable Commodity Data and Information to facilitate product tracing and collation of information relevant for placing palm oil on the EU market.
7. Authorise sharing of the following data from the e-STDB information system with the National Dashboard of Sustainable Commodity Data and Information to facilitate product tracing and omit the need for duplication: information on plantation geolocation (full set of GPS coordinates), planted hectares and date of plantation establishment.
8. Authorise sharing of the following data from the SIPERIBUN information system with the National Dashboard of Sustainable Commodity Data and Information to facilitate product tracing and omit the need for duplication: information on plantation geolocation (full set of GPS coordinates), planted hectares, productivity, plantation establishment and legality status.

Information available in the e-STDB and SIPERIBUN declarations is outlined in Annex 2. Only a subset of this information would be relevant, excluding any personal information.

Ministry of Industry and Ministry of Energy and Mineral Resources

Currently, palm oil transactions between mills, refineries and ports of export are not reported and the Ministries of Industry and of Energy and Mineral Resources have not yet provided regulations regarding the origin of commodities and their traceability. They may adopt and/or incorporate the ISPO certification scheme as a requirement for business licensing and operation, and could assist in ensuring downstream palm oil supply chain traceability.

[3] 'Forest' means land spanning more than 0.5 hectares with trees higher than 5 metres and a canopy cover of more than 10 %, or trees able to reach those thresholds in situ, excluding land that is predominantly under agricultural or urban land use (EUDR Article 2 (4)).

The Ministry of Industry National Industry Information System (Sistem Informasi Industri Nasional/SIINas), facilitates collation of data from businesses to support policy formulation, e.g. to ensure raw material and energy availability, protect domestic producers against imported goods, and provide fiscal and non-fiscal support. Information available in SIINas is outlined in Annex 2. This system could further be used to facilitate collation of additional information relevant for supply chain traceability.

Provisions for consideration by the Ministry of Industry:

1. Incorporate ISPO certification as a requirement for licensing and operation of palm oil related businesses, and for export of palm oil products.
2. Require industrial facilities, including palm oil mills, refineries and bulking facilities, to report data to SIINas including per transaction information on volumes supplied and sold along with client information, transaction date and HS code for palm oil products and derivatives (see Annex 3).
3. Authorise data sharing from the SIINas information system to the National Dashboard of Sustainable Commodity Data and Information to facilitate product tracing and collation of information relevant for placing palm oil on the EU market.
4. Establish a risk-based system to monitor ISPO-certified industries with a focus on high-risk areas and/or entities.
5. Institute a transparent and publicly accessible reporting system for supply chain data to facilitate sharing of data on compliance with ISPO certification as a means of improving credibility and competitiveness in global markets.
6. Define consequences for non-compliance with ISPO traceability requirements, such as regulatory penalties including suspension or revocation of ISPO certification.
7. Implement third-party audits of ISPO-certified facilities to verify adherence to traceability and sustainability criteria.

Ministry of Trade

The Indonesia National Single Window (SINSW) system records all data related to exports and/or imports, including customs, quarantine, licensing and port/airport documentation. It automatically harmonises the flow of information across systems and ensures data and information security. Additionally, the Ministry of Trade manages INATRADE[4], an online unified trade licencing system. To obtain an export license, exporters must submit a complete electronic application through the SINSW, which is then forwarded to INATRADE.

For the export of specific goods, exporters are required by the Ministry of Trade to complete other documents. For example, v-Legal documents provide evidence of the legality of wood and wood products for export purposes. The documents contain business identification information, HS code, quantity of products, export destination, etc.

Regulation of the Minister of Trade No. 23 of 2023 does not yet contain provisions related to traceability or legal and deforestation-free production of palm oil products or palm oil derivatives. However, palm oil products meet the criteria as specific goods requiring verification and additional documentation for ensuring legality. A list of palm oil products and

[4] http://inatrade.kemendag.go.id

derivatives included within the scope of the EUDR that should be covered by these additional requirements is included in Annex 3.

Provisions for consideration by the Ministry of Trade:

1. Requirement for data reporting to INATRADE by palm oil exporters to include per shipment and HS code information as follows:
    a. Information on the identity of the refineries and/or mills that supplied the products, quantity information and date of transaction for each supplier refinery and/or mill.
    b. Number of the ISPO certificate (or other relevant document) providing evidence of the legality of palm oil products for export.
2. Authorise data sharing between INATRADE and the National Dashboard of Sustainable Commodity Data and Information to facilitate product tracing and collation of information relevant for placing palm oil on the EU market.
3. Develop and enforce segregation protocols to prevent mixing of certified and uncertified palm oil products, and ensure that associated documentation is maintained.
4. Institute measures to promote data transparency and ensure accessibility of data to buyers, government agencies, and national and international stakeholders.
5. Implement risk-based monitoring, prioritising high-risk areas and/or entities to help ensure compliance with traceability requirements.

Annex 1: Existing ISPO traceability requirements for companies – Principle 6, Application of Transparency

Criteria	Indicator	Assessment norms
6.1. Establish and implement supply chain model and system	6.1.1. There is an evidence of establishment of supply chain system models and procedures	**Compliant if** having documents and documented commitments and there are no procedures related to their implementation. **Non-compliant** if not having documents and documented commitments and there is no implementation procedure.
	6.1.2. There is a documented commitment regarding the establishment of the supply chain model applied by the POM and the procedures related to the application of the model choice.	
	6.1.3. The available of document on handling non-conformity with claims and other deviation in the ISPO certified products and/or related documents.	**Compliant** If having documents. **Non-compliant** If not having documents.
6.2. Has complete information on purchase and sale transaction documents which at least includes the following information: a. seller's name and address, b. buyer's name and address, c. destination of delivery, d. product identification among others cpo, pko, shells, and other by- products, including the suitability of supply chain model applied, e. the number of products delivered, f. number of products received or shipped, g. date of loading and delivery, h. shipping/ transportation documentation, i. ISPO certificate number, j. validity period of the ISPO certificate, k. unique identifier number.	6.2.1. The available of purchase transaction documents which include agreements, weigh notes/tickets, cover letters, delivery notes including letter of goods delivery	**Compliant** If having documents. Non-compliant If not having documents.
	6.2.2. The available of selling transaction documents which include agreements, weigh notes/tickets, cover letters, delivery notes including letter of goods delivery.	**Compliant** If having documents. **Non-compliant** If not having documents.
6.3. Application of the supply chain system with the segregation model.	6.3.1. There are facilities that support the physical separation of certified and non-ISPO certified products at every stage of production, storage processing and shipping transportation throughout the supply chain.	**Compliant** If having facilities that support product separation **Non-compliant** If not having facilities that support product separation.
	6.3.2. There is a record of facility flushing at the time of supply chain model changes and record of separation of non-ISPO certified products.	**Compliant** If having a record. **Non-compliant** If not having a record.
	6.3.3. There is a follow-up SOP for handling contaminated products.	**Compliant** If having SOP.

Criteria	Indicator	Assessment norms
		Non-compliant If not having SOP.
	6.3.4. There are documents that prove physical separation at storage, processing and transportation facilities.	**Compliant** If having documents. Non-compliant If not having documents.
6.4. Application of a mass balance supply chain system.	6.4.1. Available data on ISPO certified products sold and purchased, includes following information: a. list of suppliers, b. material entry notes, c. production records, d. storing record, e. delivery notes, f. list of buyers.	**Compliant** If data is available. **Non-compliant** If no data is available.
	6.4.2. There is data for assurance (verification/validation) that the number of ISPO certified products does not exceed the total number stated in the certificate.	**Compliant** If data is available. **Non-compliant** If no data is available.
	6.4.2.1 If using a continuous accounting system, periodic reconciliation reports are available with the following conditions: a. daily basis monitoring (real-time), b. the quantity of ISPO certified product delivered to customers from the mill does not exceed the quantity produced on a daily record basis. c. Products produced during the freezing period cannot be certified ISPO.	**Compliant** If data is available. **Non-compliant** If no data is available.
	6.4.2.2 If using a system for recording periodic transactions (fixed inventory period), there is available a reconciliation report of maximum periodic for 3 (three) months provided that: a. total volume/weight of ISPO certified product in and out of balance, b. at the end of the reconciliation period there are no negative stocks for ISPO certified products, c. If there is excessive recording at the end of reconciliation period. Unused credits can be transferred and recorded for the next reconciliation period as long as the ISPO certificate is valid.	**Compliant** If data is available. **Non-compliant** If no data is available.
6.5. Has a control mechanism for outsourced activities.	6.5.1. There is an SOP for controlling outsourced activities.	**Compliant** If SOP is available. **Non-compliant** If no SOP is available.
	6.5.2. There is an agreement/contract document covering outsourced activities with all contractors that carry out physical handling of ISPO certified products, material ownership status.	**Compliant** If there is evidence of agreement/contract Non-compliant If there is no proof of agreement/ contract is available
	6.5.3. The ISPO supply chain system dissemination document is available to contractors.	**Compliant** If there is evidence of dissemination. **Non-compliant** If there is no evidence of dissemination.
6.6. Has a supply chain system record control mechanism that is	6.6.1. A record control SOP is available.	**Compliant** If SOP is available. **Non-compliant** If no

Criteria	Indicator	Assessment norms
implemented and remains available for at least 5 (five) years.		SOP is available.
	6.6.2. There is a supply chain record that is kept for at least 5 (five) years.	**Compliant** If a record is available. **Non-compliant** If a record is not available.
6.7. Has personnel who are competent in the implementation and maintenance of the supply chain system.	6.7.1. There are competency requirements criteria and a list of the personnel involved in the ISPO supply chain system.	**Compliant** If data is available. **Non-compliant** if data is not available.
	6.7.2. A personnel training needs plan is available.	**Compliant** If data is available. Non-compliant if data is not available.
	6.7.3. Realization of personnel training is available.	**Compliant** If data is available. **Non-compliant** If data is not available.
	6.7.4. An evaluation of training results is available.	**Compliant** If data is available. **Non-compliant** If data is not available.
6.8. Has adequate infrastructure in the implementation and maintenance of the supply chain system.	6.8.1. There is a storage capacity layout for ISPO certified products according to the production capacity.	**Compliant** If there is a storage layout document available. Non-compliant If no document storage layout is available.
	6.8.2. There is a balance infrastructure that has been calibrated.	**Compliant** If there is infrastructure and tera data. **Non-compliant** If there is no infrastructure and tera data.
	6.8.3. There is an information management system that supports the supply chain system and is implemented.	**Compliant** If an information management system is available. Non-compliant If no Information management system is available.
6.9. Registration of total production and sales quantities of the ISPO certified products.	6.9.1. A copy of the transaction reporting for ISPO certified products is available to Certification Bodies that issue ISPO certificates before delivery.	**Compliant** If having reporting records. **Non-compliant** If not having reporting records
	6.9.2. When an ISPO IT system is available, transaction registration and reporting must be carried out in the IT system before delivery.	**Compliant** If registered and have proof of reporting Non-compliant If it is not registered and has proof of reporting

Source: Ministry of Agriculture Regulation No. 38 of 2020

Annex 2: Available information in e-STDB, SIPERIBUN and SIINas

Information available in the e-STDB, SIPERIBUN and SIINas declarations is presented here. Only a subset of this information would be relevant to facilitate traceability and provision of information for the export of palm oil products to the EU, excluding any personal information: plantations' geolocation (full set of GPS coordinates), planted hectares and date of plantation establishment.

Table 1: e-STDB database

FARMER INFORMATION	
1	Name
2	Number of resident identity card (NIK – Nomor Induk Kependudukan)
3	Plantation location address (Province - Regency/City - Village/Sub-district - Complete Address)
4	Gender (Male/Female)
5	Date of Birth
PLANTATION INFORMATION	
1	Plantation land no.… (1,2,3,etc)
2	Land Status (SHM*, Girik**/SKT***/SKGR****/Management Rights, Ulayat/Customary Land, Other Legal Business, Production/Social Forest Area Land, Protected/Conservation Forest Area Land)
3	Number of document that land is registered
4	Plantation Area based on Document (m^2)
5	Planting Pattern (Monoculture/Polyculture)
6	Commodity (More than 1 commodity if its polyculture)
7	Planted Area (m^2)
8	Planting Year
9	Number of Tree Stands
10	Number of Production Per Year (tons)
11	Productivity (Tons/Ha)
12	Seed Source: 1. Certified Seed 2. Non-Certified Seed 3. Unknown
13	Type of Land (More than one can be selected if the cropping pattern is polyculture): 1. Mineral Land 2. Alkaline Land (Tidal, Peat)
14	Type of Fertilizer (Organic, Non-Organic, Mixed)
15	Sales Partners (Cooperatives, Processing Companies, Others)
16	Certification Information (if any)

FARMERS INSTITUTION	
1	Name of Farmers Institution (can include more than one)
2	Farmers Institution Commodities (can include more than one)
3	Group Number in SIMLUHTAN
4	Address of Farmers Institution
PLANTATION LOCATION	
1	At least 4 coordinates forming a polygon 1. (Long)…... (Lat)….... 2. (Long)…... (Lat)….... 3. (Long)…... (Lat)….... 4. (Long)…... (Lat)…....
ADDITIONAL INFORMATION	
1	Status on replanting (Yes/No. If already had replanting, when?)

*SHM (Sertifikat Hak Milik) – Certificate of Ownership: This is the highest form of land ownership in Indonesia, granting the holder full ownership rights over the land. It is permanent, inheritable, and can be sold or transferred to others.

**Girik – Land Tax Receipt: Girik is an old document showing the payment of land taxes. It is not a legal proof of land ownership but is often used as evidence of control over the land. To gain legal ownership, a landholder would need to convert Girik into an SHM.

***SKT (Surat Keterangan Tanah) – Land Ownership Statement: SKT is a document issued by local authorities to declare the ownership or use of a piece of land. It is often used in regions where land registration is less formal and can be an initial step toward obtaining formal ownership rights.

****SKGR (Surat Keterangan Ganti Rugi) – Compensation Letter: This document shows that a transaction took place between the seller and buyer for land that has not yet been formally registered. It is typically used as proof of a land sale or transfer but does not equate to full legal ownership.

Table 2: SIPERIBUN database

ACTOR INFORMATION	
1	Business Actor Name
2	Business Actor Office Address
3	Nomor SITU / Surat Izin Tempat Usaha (Business Location Permit number)
4	Website (If any)
5	Company Coordinate Location (if any): (Lat)….. (Long)….....
6	Company Area (ha)
7	Name of company group
PLANTATION INFORMATION	
1	Plantation land no.… (1,2,3,etc)
2	Land Status (IUP-Izin Usaha Perkebunan (Plantation Business Permit))
3	Number of document that land is registered
4	Plantation Area based on Document (m^2)
5	Planting Pattern (Monoculture/Polyculture)
6	Commodity (More than 1 commodity if polyculture)
7	Planted Area (m^2)
8	Planting Year
9	Number of Tree Stands
10	Number of Production Per Year (tons)
11	Productivity (Tons/Ha)
12	Seed Source:

	1. Certified Seed 2. Non-Certified Seed 3. Unknown
13	Type of Land (More than one can be selected if the planting pattern is polyculture): 1. Mineral Land 2. Alkaline Land (Tidal, Peat)
14	Type of Fertilizer (Organic, Non-Organic, Mixed)
15	Sales Partners (Cooperatives, Processing Companies, Others)
16	Certification Information (if any)
PLANTATION LOCATION	
1	At least 4 coordinates forming a polygon 1. (Long)…... (Lat)….... 2. (Long)…... (Lat)….... 3. (Long)…... (Lat)….... 4. (Long)…... (Lat)…....
ADDITIONAL INFORMATION	
1	Status on replanting (Yes/No. If already had replanting, when?)

Table 3: SIINas database

MILLS INFORMATION	
1	Company Group name and number of business licensing and operation
2	Mills name
3	Mills address
4	Mills coordinates
5	Processing date
6	Product volume (ton)
7	Total processing volume (Mills capacity) (ton)
8	Vehicle type (for example: box trucks, semi-trailer truck, etc.)
9	Number of vehicles entering the mills
10	Number of vehicles leaving the mills
11	Product type (FFB)
12	Product entry and exit date
13	Declaration of ability to perform segregation
BULKING TERMINAL INFORMATION	
1	Company Group name and number of business licensing and operation
2	Bulking terminal name
3	Bulking terminal address
4	Bulking terminal coordinates
5	Type of products delivered
6	Product volume (ton)
7	Number of vehicles entering the bulking terminal
8	Number of vehicles leaving the bulking terminal
9	Point of origin information
10	Point of destination information
11	Shipping documents: 1. Refinery, 2. Oleochemical, 3. Biodiesel, 4. EU Trader
REFINERY INFORMATION	
1	Company Group name and number of business licensing and operation
2	Refinery name

3	Product Volume (Ton)
4	Date of receipt CPO-in*
5	Date RBDPO-out*
6	Date RPO-out*
7	Date RBDPS-out*
8	Date RPS-out*
9	Date RBDPKO-out*
10	Date RBPKS-out*
11	Date CBS-out*
12	Date RPS-out*
13	Date Truck-in/ship-in
14	Number of Truck-out
15	Shipping documents
16	Processing result (HS Code)

*adjusted to the palm oil products and their derivatives processed at the refinery

ANNEX 3: List of HS codes for palm oil products within the scope of the EUDR

HS Code in EUDR	Indonesia HS Code 8 Digits	Product Description
1207 10 Palm nuts and kernels	1207.10	- Palm nuts and kernels :
	1207.10.10	- - Palm nuts suitable for sowing/planting
	1207.10.30	- - Kernels
	1207.10.90	- - Other
1511 Palm oil and its fractions, whether or not refined, but not chemically modified	**15.11**	**Palm oil and its fractions, whether or not refined, but not chemically modified.**
	1511.10.00	- Crude oil
	1511.90	- Other :
	1511.90.20	- - Refined oil
		- - Fractions of refined oil :
		- - - Solid fractions :
	1511.90.31	- - - - With iodine value 30 or more, but less than 40
	1511.90.32	- - - - Other
		- - - Liquid fractions :
	1511.90.36	- - - - In packing of a net weight not exceeding 25 kg
	1511.90.37	- - - - Other, with iodine value 55 or more, but less than 60
	1511.90.39	- - - - Other
		- - Fractions of unrefined oil :
	1511.90.41	- - - Solid fractions
	1511.90.42	- - - Other, with packing of a net weight not exceeding 25 kg
	1511.90.49	- - - Other
1513 21 Crude palm kernel and babassu oil and fractions thereof, whether or not refined, but not chemically modified	1513.21	- - Crude oil :
	1513.21.10	- - - Palm kernel oil
	1513.21.90	- - - Other
	1513.29	- - Other :
		- - - Fractions of unrefined palm kernel oil or of unrefined babassu oil:

HS Code in EUDR	Indonesia HS Code 8 Digits	Product Description
1513 29 Palm kernel and babassu oil and their fractions, whether or not refined, but not chemically modified (excluding crude oil)	1513.29.11	- - - - Solid fractions of unrefined palm kernel oil
	1513.29.12	- - - - Solid fractions of unrefined babassu oil
	1513.29.13	- - - - Other, of unrefined palm kernel oil (palm kernel olein)
	1513.29.14	- - - - Other, of unrefined babassu oil
		- - - Other :
	1513.29.91	- - - - Solid fractions of palm kernel oil
	1513.29.92	- - - - Solid fractions of babassu oil
	1513.29.94	- - - - Palm kernel olein, refined, bleached and deodorised (RBD)
	1513.29.95	- - - - Palm kernel oil, refined, bleached and deodorised (RBD)
	1513.29.96	- - - - Other, palm kernel oil
	1513.29.97	- - - - Other, of babassu oil
2306 60 Oilcake and other solid residues of palm nuts or kernels, whether or not ground or in the form of pellets, resulting from the extraction of palm nut or kernel fats or oils	2306.60	- Of palm nuts or kernels :
	2306.60.10	- - Ground or in the form of pellets
	2306.60.90	- - Other
ex 2905 45 Glycerol, with a purity of 95 % or more (calculated on the weight of the dry product)	2905.45.00	- - Glycerol
2915 70 Palmitic acid, stearic acid, their salts and esters	2915.70	- Palmitic acid, stearic acid, their salts and esters :
	2915.70.10	- - Palmitic acid, its salts and esters
	2915.70.20	- - Stearic acid
	2915.70.30	- - Salts and esters of stearic acid
2915 90 Saturated acyclic monocarboxylic acids, their anhydrides, halides, peroxides and peroxyacids; their halogenated, sulphonated, nitrated or nitrosated derivatives (excluding formic acid, acetic acid, mono-, di- or trichloroacetic acids, propionic acid, butanoic acids, pentanoic acids, palmitic acid, stearic acid, their salts and esters, and acetic anhydride)	2915.90	- Other :
	2915.90.20	- - Lauric acid, myristic acid, their salts and esters
	2915.90.30	- - Caprylic acid, its salts and esters
	2915.90.40	- - Capric acid, its salts and esters
	2915.90.90	- - Other
3823 11 Stearic acid, industrial	3823.11.00	- - Stearic acid
3823 12 Oleic acid, industrial	3823.12.00	- - Oleic acid
3823 19 Industrial monocarboxylic fatty acids; acid oils from refining (excluding stearic acid, oleic acid and tall oil fatty acids)	3823.19	- - Other :
		- - - Acid oils from refining :

HS Code in EUDR	Indonesia HS Code 8 Digits	Product Description
	3823.19.11	- - - - Coconut acid oil
	3823.19.19	- - - - Other
	3823.19.20	- - - Palm fatty acid distillate
	3823.19.30	- - - Palm kernel fatty acid distillate
	3823.19.90	- - - Other
3823 70 Industrial fatty alcohols	3823.70	- Industrial fatty alcohols :
	3823.70.10	- - In the form of wax
	3823.70.90	- - Other

Cover photo: A member of the Tri Daya palm oil cooperative photographs a truck during testing of a traceability platform in Parenggean, Central Kalimantan, Indonesia. **EFI**.

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