

STORIES TOLD IN MULTISTAKEHOLDER GOVERNANCE INITIATIVES:  
UNDERSTANDING THE GRIEVANCE PROCESS OF THE ROUNDTABLE ON  
SUSTAINABLE PALM OIL (RSPO)

By

Angela Shen

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Faculty Advisor:

Witold Henisz

Deloitte & Touche Professor in Honor of Russell E. Palmer, former Managing Partner,

Management Department

Vice Dean and Faculty Director, ESG Initiative

THE WHARTON SCHOOL, UNIVERSITY OF PENNSYLVANIA

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## **Abstract**

The Roundtable on Sustainable Palm Oil (RSPO) brings private sector and civil society groups under a system of governance to ensure the sustainable, equitable, and humane production of palm oil. The RSPO includes a grievance mechanism that seeks to remedy the reported violations of its members. This paper builds upon a large body of scholarship examining the effectiveness of the RSPO's conflict resolution through an in-depth investigation of the published correspondences of a complaint case involving PT. PP London Sumatra Indonesia Tbk (a subsidiary of Indofood Agri Resources Ltd) and three non-governmental organizations (NGOs). Using methods of textual analysis through NVivo and temporal analysis, this research identifies and distinguishes narratives of collaboration, opposition, and compliance used by the RSPO, NGOs, and palm oil suppliers to influence outcomes in a grievance process. The interaction of these narratives highlights strengths and gaps in the RSPO's ability to produce trust and mediate conflict.

**Keywords:** conflict resolution, esg, grievance mechanism, human rights, inter-organization communication, multistakeholder governance, palm oil, roundtable, rspo, southeast asia, supply chain, sustainability

## I. INTRODUCTION

### A. Research Question

Stakeholders refer to a group of agents who are affected by or have the ability to affect the activities of a given entity (Freeman, 1984), which in this case can be expanded to the activities within a given physical, political, social, or economic system. When multiple different stakeholder groups confront the same problem, multistakeholder governance can be practiced by bringing government, private sector, and civil society groups together to participate in dialogue, decision-making, and implementation. One category of cross-national, cross-sector challenges is the management of global supply chains: how to convert raw material into finished goods on a mass scale in an ethical and sustainable manner. The Roundtable on Sustainable Palm Oil (RSPO) is one such multistakeholder initiative (MSI) that brings together producers, processors, traders, consumer goods manufacturers, retailers, banks and investors, and non-governmental organizations, to make progress on a tripart set of impact areas summarized as “Prosperity, People, and Planet” (“Impact Report” 2022). Oftentimes, stakeholders may enter conflict over whether RSPO principles are upheld in a specific set of circumstances, in which case the RSPO plays a mediating role by implementing a “mutually agreed and documented system for dealing with complaints and grievances” (“Principles and Criteria” 2020). Previous research voices various criticisms of the RSPO and its conflict resolution mechanisms, such as being ineffective, dominated by industry interests, and inaccessible by or exclusive of critical and vulnerable communities. These studies reference a range of sources including documents, semi-structured interviews, in situ observation, and publicly available databases to examine the RSPO’s effectiveness on specific dimensions such as food security, human rights, and justice. While much work has been done on the RSPO from a multi-case, organization-wide, or cross-organizational

comparative scope, fewer studies take advantage of the level of depth revealed by inter-organizational correspondences published by the RSPO for every individual complaint case. Such letters add a new perspective to the messages and underlying intent of every stakeholder involved in the RSPO conflict resolution process, providing valuable contextual information such as what conflicts and varying interests were negotiated to reach agreement. Thus, this research seeks to answer the question, what kinds of narratives and rhetorical methods emerge among different stakeholders as they seek to influence outcomes in a grievance process, and what do these differing perspectives and approaches imply for the larger effectiveness of a multistakeholder governance system? Using textual analysis through NVivo and temporal analysis with the aid of RavenPack, this project focuses on published correspondence from the case between PT. PP London Sumatra Indonesia Tbk (a subsidiary of PT Salim Ivomas Pratama Tbk) and the Indonesian Labour Rights Association (OPPUK), Rainforest Action Network (RAN), and International Labour Rights Forum (ILRF) to understand how generally-agreed upon standards of trust, transparency, engagement, and dialogue in a multistakeholder organization are interpreted and leveraged by various stakeholders during grievance resolution.

## **B. Contribution to Literature**

The palm oil industry consists of a complicated value chain with nuanced positive and negative impacts that involve many stakeholders. The Roundtable on Sustainable Palm Oil (RSPO) aspires to unite those relevant stakeholders to set standards to evaluate and if necessary mitigate those impacts. To resolve conflicts around potential violations of these standards the RSPO conducts a structured grievance process intended to be fair, transparent, and evidence based. Analysis of stakeholder narratives present throughout this grievance process provides insight into

challenges and goals for non-state-based conflict resolution in other controversial industries such as agriculture, consumer goods, and mining.

This study draws from and contributes to multiple research areas. Significant scholarship, including qualitative content analysis, has been done to investigate dimensions of multi-stakeholder engagement and sustainability strategy with regards to palm oil (Dewi 2021; Snashall 2021; Wardhani & Rahadian 2021). Another area of research focuses on measurement of stakeholder perception, relying on institutional analyses and expert interviews to understand stakeholder opinions on topics like oil palm certification (Dompheh & Gasparatos 2021). Multiple studies have focused on gauging consumer perceptions of palm oil, identifying negative sentiment influenced by social media campaigns (Langley & van den Broek, 2010; Teng et al. 2020). Stakeholder perceptions have also been measured with regards to specific events and controversies in a given industry (Dorobantu 2017). Multi-stakeholder partnerships (MSPs) can be described in terms of three governance processes (deliberation, decision-making, enforcement), harnessing three key dimensions of so-called “wicked problems” (knowledge uncertainty, value conflict, dynamic complexity) (Dentoni & Schouten 2018). With RSPO as a case study, this research seeks to understand and predict complex relations between multistakeholder governance processes, systemic change, and societal problems. This paper thus builds upon an extensive body of literature developing methods to map out and understand stakeholders of an issue.

Researchers have also previously explored the impacts of the RSPO and similar multistakeholder governance initiatives from a variety of angles. The RSPO certification is found to have mixed or limited ability to affect shareholder value or improve food security (Tey & Brindal 2021; Nesadurai 2013). The RSPO is also criticized for privileging business interests, specifically export-oriented palm oil companies and downstream industries along value chain,

while marginalizing smallholders, plantation workers, indigenous peoples through different structures and processes (Pichler 2013; Tyson & Choiruzzad 2018; Fougère & Nikodemus 2020). This paper also builds upon previous research on the RSPO's dispute resolution mechanism. Afrizal (2015) studied whether the process led to executable agreements, Köhne (2014) examined if outcomes benefited the affected stakeholders, and Wielga and Harrison (2021) focused on how the process affected land rights, noting discrepancies between whether the RSPO upheld the United Nations' Guiding Principles on grievance mechanisms and whether its remedies were effective. Afrizal et al. (2023) conducts a multi-dimensional study of outcomes to conclude that the grievance process is biased towards companies due to its inaccessibility, unequal treatment of involved parties, and insufficient monitoring post-agreement. In synthesizing the literature, it becomes apparent that the effectiveness of the RSPO as a conflict resolution system is a point of significant skepticism, as both the procedures and outcomes it follows do not necessarily help the communities affected by a grievance. Despite the wealth of research on the RSPO, there remains a lack of studies taking advantage of the published documents and correspondences of RSPO complaint cases to understand the progression and evolution of attitudes of the RSPO, the complainant, and the defendant during the grievance process. Thus, this preceding discussion of scholarship on the RSPO lays the groundwork for an in-depth evaluation of the chronology and narratives of a specific RSPO complaint case.

## **II. BACKGROUND**

### **A. Palm Oil Industry**

Global annual production of palm oil in 2019 reached 74.58 million tons, making up 36% of the world's vegetable oil as the lowest cost and most productive oil crop (Ritchie & Roser 2021). Beyond cooking oil and shortening, global uses for palm oil occur in a wide range of products and

industries, most significantly food products (68%), followed by industrial applications for cleaning agents, cosmetics, soaps, and detergents (27%), and as a biofuel (5%) (Noleppa & Carlsburg 2016, 5). In the food and beverage industry, palm oil appears in everything from snacks to baked goods to frozen food (Owens 2020). Malaysia and Indonesia together produce 88% of the world's palm oil, and the commodity plays a significant role in both countries' trade and economic development (Ritchie & Roser 2021).

To be ready for purchase, oil palm must be produced, milled, processed, refined, exported, or traded before being manufactured into its many different product forms (Thomas et al. 2015, 49). Figure 1 published by the World Resources Institute (WRI) helps visualize the flow of production.

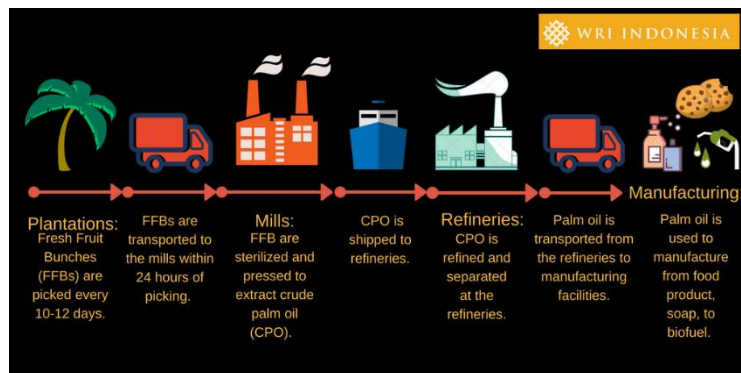


Figure 1. Palm oil supply chain diagram (Widyapratami & Bagja 2018)

This complicated multi-step process involves multiple actors and often requires crossing through multiple countries and jurisdictions. The palm oil industry has a high degree of vertical and horizontal integration, as a large palm oil supplier may own many plantations and mills, several different processing plants, and sometimes even its own manufacturing facilities and brands geared towards end consumers.

## B. Environmental, Social, Governance (ESG) Issues in Palm Oil

In recent years, consideration of environmental, social, and governance (ESG) factors has been increasingly relevant in both the investing and corporate decision-making spheres within the

private sector. Explanations for why more and more major corporations openly discuss ESG in relation to their operations vary widely, from solely economic arguments about increasing returns and profitability, to strategic arguments about obtaining competitive advantage and the license-to-operate, to normative arguments about responsibilities owed by businesses to society (Campbell 2007). ESG issues are often connected to concepts within stakeholder theory, which examines the roles and responsibilities of firms towards all the groups they affect beyond their shareholders (Eskerod 2020). At the firm level, this includes buyers and suppliers; at the industry level, this includes competitors; at the level of the general environment, this includes the media, politicians and regulators, non-profit organizations and advocacy groups, and local communities. While definitions and standards for ESG may vary, ESG provides an important context for why a multistakeholder organization like the RSPO continues to be relevant to a wide network of public and private stakeholders. The RSPO's standards for palm oil supply chains reflect ESG values such as reducing negative environmental impacts, upholding human rights, and acting with transparency.

The palm oil industry has sustained many years of critiques for various ESG shortcomings. Advocacy groups like Greenpeace, the Rainforest Action Network (RAN), and Friends of the Earth (FOE) have dedicated a significant amount of time and resources to highlight the ESG abuses of palm oil. Major non-profits and third-party organizations like the World Wildlife Fund (WWF), the Zoological Society of London (ZSL SPOTT index), and MSCI ESG ratings have developed comprehensive metrics around the scoring of ESG performance of parties involved in producing and sourcing palm oil. The expansion of oil palm plantations has also led to significant land-related conflicts between companies and affected communities (Afrizal 2013). Due to such extensive research and advocacy around various ESG issues and the fact that many of these ESG claims have



relatively direct and empirically confirmable ties to palm oil that can be measured and tracked, the case study of the RSPO and palm oil is useful in understanding the larger ways in which multistakeholder initiatives can be used to resolve ESG issues. While the palm oil industry is unique, lessons about its approach to ESG also offer insight into other industries with similarly complex supply chains, such as cocoa, coffee, jewelry, textiles, and biomaterials.

Common environmental issues in the palm oil industry include contributions to regional tropical deforestation, loss of biodiversity, greenhouse gas emissions, wetland drainage, and management of water, chemicals, and pests (Meijaard et al. 2020). Common social issues include labor rights, land rights, lack of engagement with various local and indigenous communities, and overall unequal distribution of economic benefits (Obidzinski et al. 2020). Strong governance underlies the environmental and social factors and consists of systems of clear communication, transparency, and accountability including regular monitoring and assessment of various impacts as well as mechanisms to deal with complaints and grievances as they arise. Palm oil also presents some opportunities for positive environmental and social impacts, including serving as a more sustainable and affordable to produce vegetable oil, helping to combat food insecurity, and supporting local economic development (Snashall 2017).

### **C. Roundtable on Sustainable Palm Oil (RSPO) and its Grievance Process**

The Roundtable on Sustainable Palm Oil (RSPO) is a non-profit multistakeholder organization founded in 2004 that strives to support sustainable development in the palm oil industry (“Impact Report” 2022). With over 5,200 members from twenty-one countries, the RSPO categorizes its members into seven major stakeholder groups: oil palm producers, processors, and traders; consumer goods manufacturers; retailers; banks and investors; and environmental and social non-governmental organizations (NGOs) (“Impact Report” 2022). RSPO membership

requires compliance with the RSPO's Principles and Criteria (P&C), which include standards for land use, human rights, pay and working conditions, and environmental management ("Principles and Criteria" 2020). RSPO also offers three certification schemes towards its Trademark license: 'Identity Preserved', 'Segregation', and 'Mass Balance', with varying degrees of traceability and costs of implementation ("RSPO Supply Chain Certification Standard" 2020). The RSPO has been the subject to a wide range of criticism including lack of enforcement, insufficient action on climate change, and exclusion of smallholders, plantation workers, and indigenous communities (Pichler 2013). Beyond the RSPO, many companies participate in additional platforms and commitments such as the Palm Oil Innovation Group, Palm Oil Collaboration Group, High Carbon Stock Approach, and Consumer Goods Forum Forest Positive Coalition.

Complaints against RSPO members are resolved through the RSPO Complaints System, through a multi-step and often multi-year procedure outlined in Figure 2.

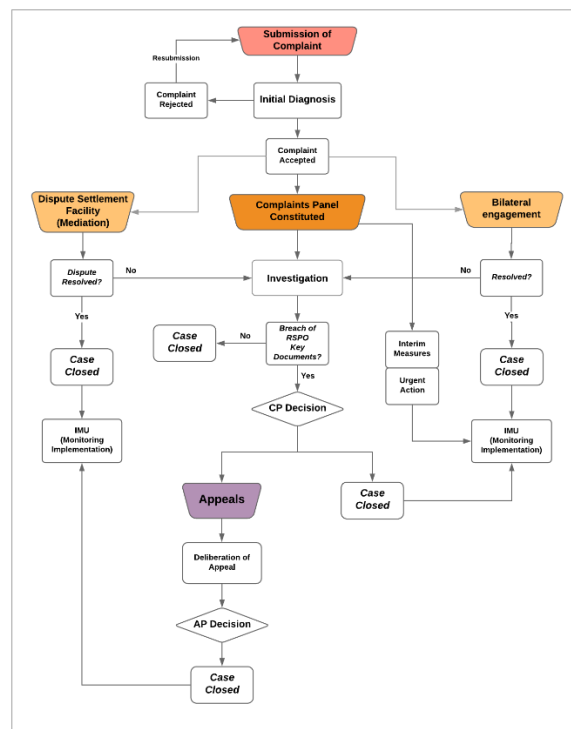


Figure 2. Flowchart of RSPO Complaints and Appeals Procedure (RSPO 2022)

Scott (2014)’s “Three Pillars of Institutions” provides a framework to understand how the RSPO as an institution shapes behavior through regulative, normative, and cognitive factors. Regulative factors encapsulate the influence of explicit regulatory processes such as rule-setting, monitoring, and sanctioning activities (Scott 2014, 59). Regulative systems exist on a spectrum of formalization determined by three factors: (1) *obligation* to obedience due to scrutiny by outside parties; (2) *precision* of the rules in their specification of necessary conduct; (3) *delegation* of authority to external parties to apply the rules and deal with disputes (Scott 2014, 60). The RSPO exists on the moderately formal side of the spectrum, in which rules and external-party dispute mechanisms are clearly elucidated and members, though not officially obligated to follow rules, face scrutiny for their compliance from fellow RSPO members and outside sources. Normative factors invoke compliance based on a sense of social obligation and consideration of what is most appropriate in each situation (Scott 2014, 64). In the context of this RSPO case, social obligation may be both internal—the RSPO, the complainant, and the defendant invoking normative reasons to change each other’s behavior—and external—outside stakeholders like the government or news media placing normative pressure on the outcome of the grievance process. Finally, the cultural-cognitive pillar operates through shared understanding, including commonly held beliefs and logics of action (Scott, 2014, p. 60). In this case, stakeholders would agree to decisions on how to resolve this complaint based on shared cultural conceptions of what to do.

#### **D. The RSPO Case on Indofood Agri**

This study focuses on one case in which an RSPO complaint was filed against a palm oil supplier, Indofood Agri Resources Ltd.. Details around the company and its corresponding controversy are reviewed below.

Indofood Agri Resources Ltd (IndoAgri) is a vertically integrated agribusiness company that engages in research and development, seed breeding, cultivation, milling, refining, branding, and marketing of palm oil derivative products, most notably in the Indonesian branded cooking oil, margarine, and shortening markets (Indofood Agri Resources Ltd, 2023). It is a subsidiary of Indofood Singapore Holdings Pte. Ltd., which in turn is majority-owned by the Salim Group, a major Indonesian conglomerate. The company's plantation division in Indonesia currently operates 244,768 hectares of nucleus oil palm estates, producing over 3700 tons of fresh fruit bunches, the raw material for palm oil mills, per year (Indofood Agri Resources Ltd, 2023). The company is publicly listed on the Singapore Exchange (ticker: 5JS) and the Frankfurt Stock Exchange (ticker: ZVF). The defendant in the RSPO complaint case is PT PP London Sumatra Indonesia Tbk ("PT Lonsum"), a subsidiary of PT Salim Ivomas Pratama Tbk ("SIMP"), which is a subsidiary of Indoagri. The ownership structure as of 2016, according to one of the primary documents from the RSPO complaint, is shown in Figure 3.

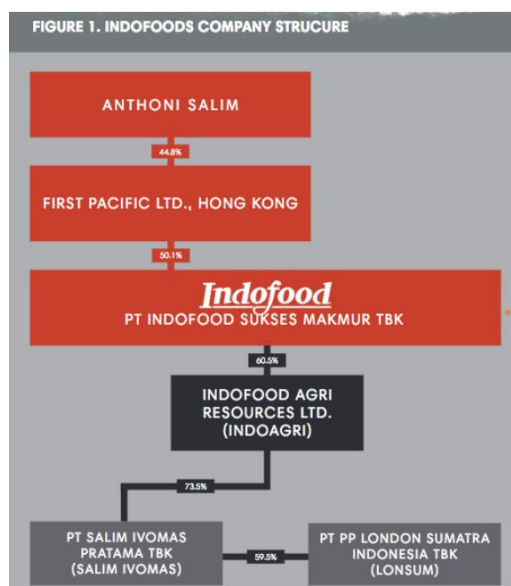


Figure 3 Ownership structure of PT Lonsum (Letter to RSPO dated October 11, 2016)

A brief survey of the timeline of events surrounding the complaint case follows: On June 9<sup>th</sup>, 2016, Indonesian Labour Rights Association (OPPUK), Rainforest Action Network (RAN),

and International Labour Rights Forum (ILRF) published a report titled, “The Human Cost of Conflict Palm Oil: Indofood, PepsiCo’s Hidden Link to Worker Exploitation in Indonesia”. The report revealed various human rights abuses that occurred on two palm oil plantations owned and operated by Indofood subsidiary PT London Sumatra (PT Lonsum), including unfair and underpaid employment contracts, use of child labor, and inadequate health and safety protection (“The Human Cost of Conflict” 2016). The report highlights the role of PepsiCo as Indofood’s joint venture partner, as well as firms like Nestle and Unilever as Indofood’s customers. Over the course of the next few months, RSPO engaged with IndoAgri and the complainants. On December 1<sup>st</sup>, 2016, Assurance Services International (ASI), the sole accreditation body for RSPO, announced a suspension of IndoAgri following a special audit (“PT. PP London Sumatra”). After various communications with PT Lonsum and meetings amount the RSPO Complaints Panel, the RSPO finally announced on February 28<sup>th</sup>, 2019, the official termination of RSPO membership of PT Lonsum and its parent company (“PT. PP London Sumatra”).

### **III. METHODS**

#### **A. Case Selection and Data Sources**

Out of the many complaint cases handled by the RSPO, this IndoAgri case was chosen for several reasons: (1) the complaint has been closed, so no further updates or changes will occur; (2) due to the early and public nature of the case, it includes more published correspondences and documentation than many other RSPO complaints which can be used for study; (3) the case concluded with the termination of RSPO membership, and thus provides an example of a grievance process successful in procedure yet unsuccessful in correcting for the reason of complaint. The IndoAgri case also features extensive involvement from non-governmental actors, providing the

opportunity to analyze an example of how NGO advocacy strategy has been implemented NGO.

In the following discussion of findings, these terms and definitions are appropriate:

**Defendant:** PT PP London Sumatra Indonesia Tbk (“PT Lonsum”), a subsidiary of PT Salim Ivomas Pratama Tbk (“SIMP”), which is a subsidiary of Indofood Agri Resources Ltd. For the sake of concision and clarity, this paper will generally refer to “IndoAgri” as the source of all documents sent and actions taken by the defendant.

**Complainant:** Indonesian Labour Rights Association (OPPUK), Rainforest Action Network (RAN), and International Labour Rights Forum (ILRF). These three organizations worked in alignment to send correspondences to IndoAgri and the RSPO function with a singular message. RAN frequently functions as the leading sender and recipient to represent these three complainants. Thus, for the purpose of this study, this paper will generally engage with these three organizations as if they were a single stakeholder entity, referred to as “NGOs.”

The primary units of analysis are letters and documents sent by the defendant, the complainant, and the RSPO over the course of the grievance resolution process. This case was accessed through the RSPO’s publicly available Complaints System website, where it is designated as under the complaint code GR-000885. The documents span from October 12<sup>th</sup>, 2016 (when the complaint was filed) to February 28<sup>th</sup>, 2019 (when the complaint was closed). Twenty-three total letters were published. Two of the twenty-three were short, official letters sent by third-party accreditation bodies to deliver reports from their investigations, and thus not included in the primary textual analysis of correspondence between relevant stakeholders. A letter is given a unique identification based on its sent date and its senders and recipients. Useful summary information of the sources is presented in Table 1 and Table 2.

*Table 1 Count of Types of Material Published in RSPO Complaint System*

Type	
Document	3
Letter	23
Report	3

*Table 2 Number of Letters for Different Sender-Recipient Pairs*

<b>Sender</b>	<b><u>Recipient</u></b>		
	<b>RSPO</b>	<b>IndoAgri</b>	<b>NGOs</b>
RSPO		6	2
IndoAgri	6		1
NGOs	4	1	1

## **B. Methods**

Recognizing the variety and fluidity of concepts generally used to study grievance procedures, this study takes an exploratory, data-driven approach that treats the United Nations Guiding Principles on grievance mechanisms as a starting point from which novel insights gradually emerge. This inductive approach to understanding an RSPO complaint case offers an opportunity to explore dimensions of multistakeholder decision-making that are difficult to codify or standardize (Kaplan & Mikes 2016). Data comes from a combination of corporate press releases, news articles, NGO publications, and the RSPO Complaints System website. The primary data on the twenty-one letters was compiled from the RSPO website and organized by date and other useful meta-data to be prepared for analysis.

To study the RSPO conflict resolution process, this paper draws upon Fachin & Langley (2018)'s process research paradigms of process as evolution and process as narrative. Process as evolution focuses on changes or convergence over time. In this study, timelines are recreated, visually mapped, and decomposed into useful segments to understand RSPO grievance procedures as a whole and identify key shifts, events, or moments of convergence as well as their underlying drivers. A timeline of correspondences between the RSPO, Indofood Agri, and the non-profit activists is supplemented by additional temporal data on outside stakeholder actions, including news media publication and decisions by palm oil suppliers and financiers. Process as narrative helps capture the multiplicity of meanings within a given event by seeking to understand how

people make sense of their experiences of events (Fachin & Langley 2018). In this study, correspondences written by each stakeholder group—the RSPO, Indofood Agri, and the non-profits—offer in-depth insight into how each group interprets the reality of the RSPO grievance process, presenting the opportunity to better understand each stakeholder’s underlying priorities and strategies. This narrative analysis was conducted through the qualitative method of coding using NVivo software, following the procedure articulated below.

Neale (2016) describes coding as “reviewing all data line-by-line, identifying key issues or themes (codes) and then attaching segments of text (either original text or summarized notes) to those codes” (1097). Code creation was guided by the primary research question and followed an emergent method, in which codes based on concepts and actions are derived over the course of study of the data (Blair 2015). Coding took place in multiple cycles based on the coding methods recommended by Saldaña (2016), allowing for the generation of richer meaning. During the first cycle, *in vivo* coding, in which codes are exact words and phrases from the document, and sentiment coding, in which documents are examined for words and phrases indicating varying degrees of positive or negative sentiment, were conducted through NVivo. The second cycle involved process coding, which identifies on-going actions with codes phrased as gerunds (Theron 2015). In the third cycle, codes were strategically rearranged to eliminate redundancy and reveal core categories through which to group related codes. To identify patterns and generate conclusions through the codes, different visualizations such as charts and maps were created, tested, and interpreted.

To deepen and enrich the insights generated through coding, additional findings are extracted through written memos. Mihas (2019) explains that document reflection memos encompass the narrative journey of a document, while key quotation memos permit investigation



into the power of language and the perceptions of its writers. While written correspondences are being analyzed rather than interviews, Mihas (2019) acknowledges that “[formal] documents have messengers (the ascribed author), messaging (a presentational style), and messages (textual claims and subtextual layers); each of these components reveals meanings conveyed to the audience” (11). Thus, thematic and narrative analysis through coding and memos flows into larger analysis of the narratives present in RSPO conflict resolution.

The collection and combination of temporal data also formed a critical part of narrative analysis. Data on media sources and their corresponding publication dates was extracted from RavenPack, a news database and analytics software, and SPOTT, a platform that tracks ESG performance of soft commodity producers.

#### IV. FINDINGS

In the context of business, terms such as grievance mechanism, conflict resolution process, and remediation process refer to the concept of a structured system of internal and/or external policies and procedures for a corporation to remedy negative impacts associated with its operations. Grievance mechanisms can be state-based or non-state-based or non-state-based and operate through judicial or non-judicial channels (Shift Project 2014). As a non-state-based governance method, the IndoAgri RSPO case can be evaluated based on several frameworks used commonly in practice for grievance mechanisms.

In its Guiding Principles on Business and Human Rights (UNGPs), the United Nations provides eight “Effectiveness Criteria for Non-Judicial Grievance Mechanisms” which are listed in Table 3.

*Table 3 UNGP Effectiveness Criteria for Non-Judicial Grievance Mechanisms (United Nations 2012).*

<p><b>(a) Legitimate</b></p>	<p><b>(e) Transparent</b> Keeping parties to a grievance informed about its progress, and providing sufficient information about the</p>
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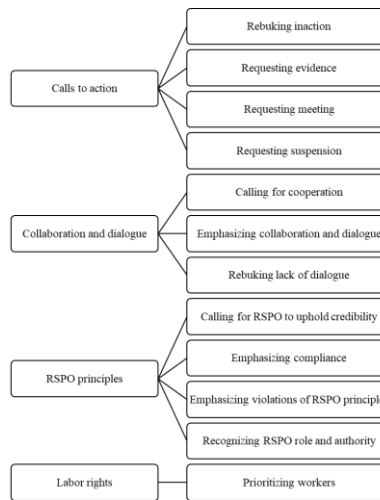
<p>Enabling trust from the stakeholder groups for whose use they are intended and being accountable for the fair conduct of grievance processes.</p> <p><b>(b) Accessible</b> Being known to all stakeholder groups for whose use they are intended and providing adequate assistance for those who may face particular barriers to access.</p> <p><b>(c) Predictable</b> Providing a clear and known procedure with an indicative time frame for each stage, and clarity on the types of process and outcome available and means of monitoring implementation.</p> <p><b>(d) Equitable</b> Seeking to ensure that aggrieved parties have reasonable access to sources of information, advice, and expertise necessary to engage in a grievance process on fair, informed, and respectful terms.</p>	<p>mechanism's performance to build confidence in its effectiveness and meet any public interest at stake.</p> <p><b>(f) Rights-compatible</b> Ensuring that outcomes and remedies accord with internationally recognized human rights.</p> <p><b>(g) A source of continuous learning</b> Drawing on relevant measures to identify lessons for improving the mechanism and preventing future grievances and harms.</p> <p><b>(h) Based on engagement and dialogue</b> Consulting the stakeholder groups for whose use they are intended on their design and performance, and focusing on dialogue as the means to address and resolve grievances.</p>
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These criteria were referenced throughout the coding process of the letters from IndoAgri, RSPO, and the non-governmental organizations Indonesian Labour Rights Association (OPPUK), Rainforest Action Network (RAN), and International Labour Rights Forum (ILRF). In addition, the RSPO also has various standards set regarding its own conflict resolution mechanisms, including 2.3 and 5.1 through 5.5 of the Code of Conduct (RSPO 2022). The two standards most contested in the IndoAgri case are 2.3 “Members will commit to open and transparent engagement with interested parties, and actively seek resolution of conflict” and 5.1 “Members will seek to resolve grievances directly with other member organisations or individuals in a timely fashion, and will not make unsubstantiated allegations of breaches against other members” (RSPO 2022).

By recursively developing, updating, and deriving information from codes, the UNGP criteria and the RSPO Code of Conduct influenced the themes and findings extracted from the data. Four of the eight UNGP criteria proved especially relevant when examining differences in stakeholder narratives: (a) Legitimacy; (c) Predictability; (f) Rights-Compatible; and (h) Engagement and Dialogue.

Figure 4 lists the parent and child codes that resulted from this study. Child codes represent the active processes taking place in the correspondences, while parent codes represent umbrella categories that group together similar active processes. Table 5 lists the percentage of occurrences of each code for each respective stakeholder group. For instance, out of all the content coded to “Requesting meeting,” 13.75% came from letters written by a representative of Indofood Agri, 67.08% came from letters written by a representative of one of the NGOs, and 19.17% came from letters written by a representative of the RSPO.

*Figure 4 Hierarchy of Codes*



*Table 4 Percentage Occurrence of Codes for Each Stakeholder*

		Indofood Agri	NGOs	RSPO
Calls to Action	Rebuking inaction	0%	100%	0%
	Requesting action	1.52%	84.83%	13.66%
	Requesting evidence	100%	0%	0%
	Requesting meeting	13.75%	67.08%	19.17%
	Requesting suspension	0%	100%	0%
Collaboration and Dialogue	Calling for cooperation	14.77%	0%	85.23%
	Emphasizing collaboration and dialogue	6.6%	37.74%	55.66%
	Rebuking lack of dialogue	4.1%	95.9%	0%
RSPO Principles	Calling for RSPO to uphold credibility	0%	100%	0%
	Emphasizing compliance	100%	0%	0%
	Emphasizing violations of RSPO principles	0%	97.33%	2.67%
	Recognizing limitations of RSPO	0%	100%	0%
	Recognizing RSPO role and authority	74.68%	25.32%	0%
Labor Rights	Prioritizing workers	0%	94.19%	5.81%

Based on the distribution of codes between different stakeholder groups shown in Table 4 and the synthesis of document reflection memos written to summarize the main message of each letter, three separate narratives emerge. These narratives are presented in Table 5. Each narrative is communicated and reinforced throughout all the letters written by its corresponding stakeholder.

*Table 5 Different Stakeholder Narratives*

<b>Roundtable on Sustainable Palm Oil:</b> We are following an evidence-based, transparent, and collaborative process to reach a decision around this conflict.
<b>IndoAgri:</b> We are RSPO members who comply to RSPO standards and Indonesian law. The complainants have failed to substantiate their claims with evidence. We are open to following the steps and meetings laid out by the RSPO.
<b>RAN, OPPUK, ILRF:</b> We have shown evidence of violations. We prioritize workers' rights and expect RSPO to do the same. Indofood Agri has been given an opportunity to engage and resolve these violations but has failed. RSPO needs to uphold its principles and suspend Indofood Agri.

Explanations and evidence for each stakeholder narrative listed in Table 5 will now be provided.

#### **RSPO:**

The RSPO delivers the most neutrally toned narrative of the three groups. Especially in the first two years prior to the Complaint Panel's official decisions, the RSPO had high levels of messaging coded to "Calling for collaboration" and "Emphasizing collaboration and dialogue." As represented in Table 4, UNGP grievance mechanism effectiveness criteria (h) Engagement and Dialogue is a value reinforced by all three stakeholders, but the RSPO especially demonstrates its prioritization of the integrity of the grievance process.

By comparing correspondences from the RSPO and from the NGOs, a potential criticism of the RSPO's rhetorical behavior emerges. Through the choice to frame itself as a mediator seeking to resolve conflict, the RSPO neglects to articulate or reinforce the underlying values and mission statement behind its procedures. The RSPO notably makes up 5.81% of the mentions to "Prioritizing workers," with the NGOs responsible for an overwhelming majority of references to

workers' rights. Considering that the complaint is made with regards to labor rights, and that external media sources covering the controversy tend to highlight workers' lives, the relative absence of mentions or affirmations of workers' rights by the RSPO is significant.

***IndoAgri:***

Up until the closure of the case in which PT Lonsum's RSPO membership was terminated due to non-compliance, IndoAgri also maintained a message of acquiescence to the RSPO's authority and its grievance procedures. IndoAgri's correspondences made up 100% of the content coded to "Emphasizing compliance," reflecting its role as a defendant in the complaint case. Similarly, 74.68% of content coded to "Recognizing RSPO role and authority" corresponds to letters written by IndoAgri. Such deference to the RSPO's rules alongside IndoAgri's low frequency of "Requesting Action" indicates a more passive strategy.

Alongside emphasizing its compliance with RSPO and Indonesian rules, IndoAgri's other rhetorical method of defense was "Requesting evidence," in which the firm repeatedly argued that the complainants failed to substantiate their claims with evidence. This debate on whether or not claims have been substantiated are made in reference to RSPO Code of Conduct 5.5, in which members are expected to "not make unsubstantiated allegations of breaches against other members" (RSPO 2022). The letters and reports published from the complaint process provide evidence of the complainant giving extensive details of each RSPO violation, including citations for which Principles and Criteria were violated in each example and why. However, the Code of Conduct phrase "unsubstantiated allegations" allows for some ambiguity as to what distinguishes an allegation substantiated from one that is unsubstantiated. As a result, defendants such as IndoAgri still have the rhetorical power to claim a dearth of evidence as defense.

***NGOs:***

In contrast, the NGOs provide detailed lists, charts, and reports recording evidence of PT Lonsum's violations of RSPO principles. The NGOs frame their intentions around desire to protect workers' rights, citing that as a reason for their unwillingness to provide IndoAgri with specific GPS coordinates and identification of workers interviewed for their reports. The NGOs are frequently more critical and active in their letters, calling out IndoAgri's failure to engage with them in dialogue and the RSPO's delay in responding to their concerns. In multiple letters sent over the three-year timespan of the case, the NGOs seek to pressure the RSPO into suspending PT Lonsum's membership, citing evidence and highlighting the importance of maintaining credibility for the RSPO.

84.83% of content coded to "Requesting action" and 67.08% of content coded to "Requesting meeting" belongs to letters sent by the NGOs, even though the RSPO and IndoAgri also have reasons to request action and meetings. The frequency of "Requesting action" codes for NGOs reflects their more active, elaborative style of communication.

The NGOs' exhibit more vocal and explicit skepticism of the RSPO's efficacy, as it is responsible for most codes to "Calling for RSPO to uphold credibility" and "Recognizing limitations of RSPO." A deeper analysis of "Recognizing limitations of RSPO" reveals four categories of limitations cited by the NGOs, shown with examples in Table 6.

*Table 6 Categories of RSPO limitations cited by NGOs*

Category	Example
Insufficient standards	"Key Facts and Findings of other Violations not Currently Covered by the RSPO P&C" (NGO letter sent October 11 <sup>th</sup> , 2016).
Delays	"We understand that no such decision has been considered by the Complaints Panel1 to date, three and a half months after the filing of our complaint. We write to ask why and reiterate the request outlined in our complaint to suspend RSPO membership status." (NGO letter sent January 26 <sup>th</sup> , 2017).

Gaps in action	“Reviewing your November 15, 2017 response in depth, we note the following gaps, which must be resolved” (NGO letter sent November 20 <sup>th</sup> , 2017).
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The NGO’s emphasis on the shortcomings of the RSPO indicates challenges facing the RSPO grievance process’s ability to fulfil the UNGP’s criteria for effective non-judicial grievance mechanisms. The NGO’s verbalized dissatisfaction with the timing and content of the RSPO’s actions indicate distrust of the RSPO process, calling into question UNGP Grievance Mechanism criteria (a) Legitimate. Dissatisfaction with timing, as discussed in Table 4 under the category ‘Delays,’ also correlates to UNGP criteria (c) Predictable. The Table 4 category of ‘Insufficient Standards’ correlates to UNGP criteria (f) Rights-Compatible, as the NGOs make written recognition of human rights violations by IndoAgri that are explicitly not covered under any of the RSPO’s Principles and Conduct.

To exert influence in the grievance process, the NGOs implement a tactic of normative and social pressure. Table 7 provides specific examples of content coded to “Calling for RSPO to uphold credibility,” all taken from letters written by the NGOs. The NGOs use the RSPO’s mission as leverage to persuade the RSPO to act, repeatedly referencing the RSPO’s “credibility to its stakeholders” and the quality of its “certification standard.” This NGO tactic of using reputational appeals and public shaming to influence the RSPO fits within the larger context of continued criticism of the RSPO from non-profit and academic sources. Using the categorizations created by Ruysschaert & Salles (2016) to understand different strategies taken by conservation NGOs when engaging with the RSPO, the NGOs discussed in this study are taking the ‘opponent’ approach, in which they are not RSPO members to avoid legitimizing the RSPO but “use the RSPO as a platform to expose bad practices in the supply chain.” By investigating and generating media attention around evidence against prominent palm oil suppliers like IndoAgri who break RSPO

rules, these NGOs marshal resources and expertise to influence the RSPO in their favor (Ruysschaert & Salles 2016).

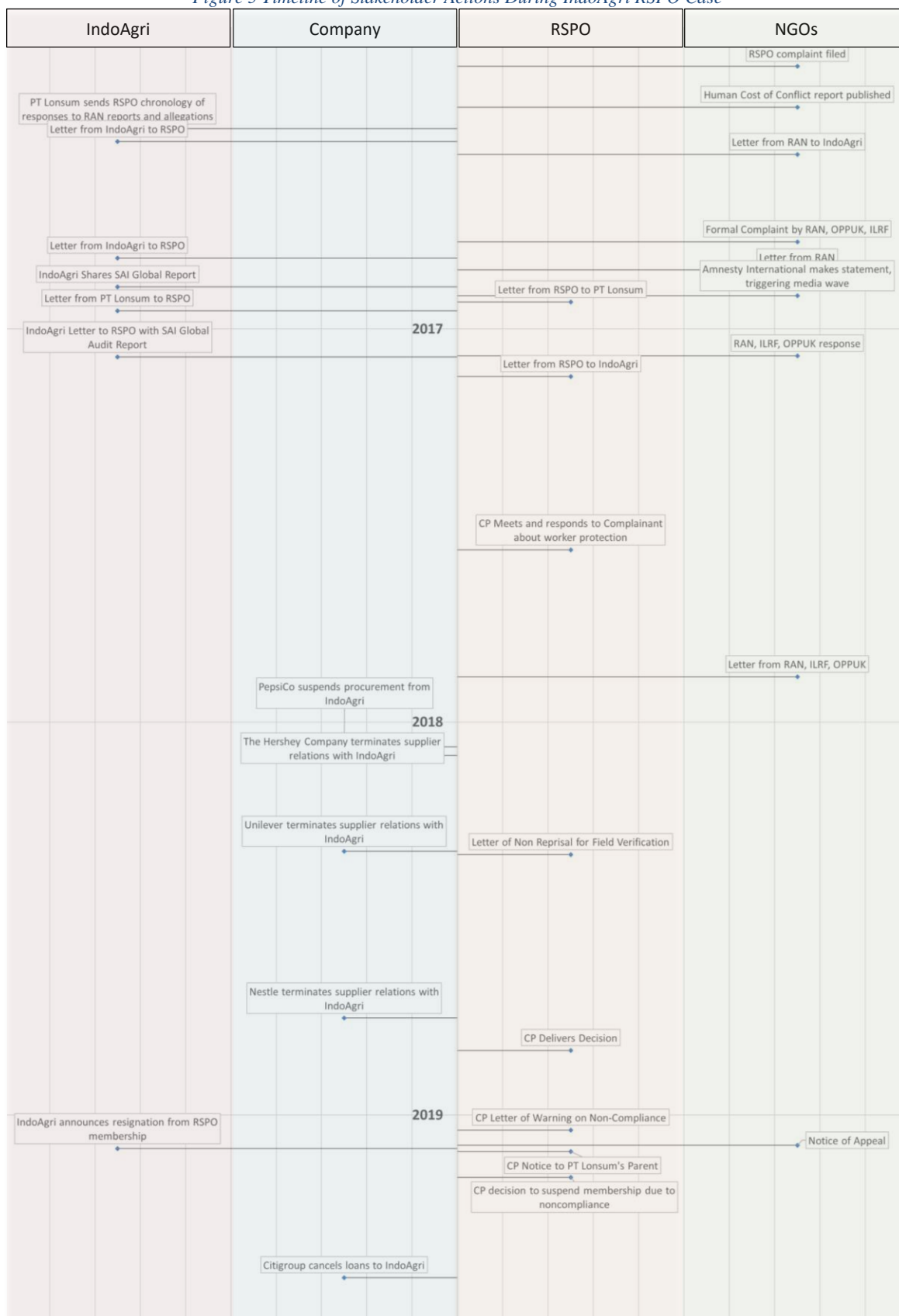
*Table 7 Coded Examples of NGOs Calling on RSPO to Uphold its Principles*

<b>Letter from NGOs to RSPO (November 11<sup>th</sup>, 2016)</b>			
No	fgv-classification	0.0423	2
We call on the RSPO to uphold its certification standard and demonstrate its credibility to all stakeholders by suspending the membership and certification of Lonsum and its parent company Salim Ivomas.			
As one of the most vulnerable and marginalized stakeholders, we hope the RSPO will take these violations of workers' rights and their safety seriously.			
<b>Letter from NGOs to RSPO (January 26<sup>th</sup>, 2017)</b>			
No	fgv-classification	0.0510	1
The RSPO's credibility is closely tied to its responsible handling of complaints such as ours. Delaying the suspension decision of a company like Lonsum, which RSPO's own accreditation body and other sources have shown is in violation of the RSPO Principles & Criteria, means the RSPO permits the ongoing use of its label by companies shown to be in violation of its own standard. This poses a serious reputational risk for the RSPO and calls into question the credibility of its label.			
<b>Letter from NGOs to RSPO (January 29<sup>th</sup>, 2019)</b>			
No	fgv-classification	0.0086	1
Considering that allowing a company with known systemic labor violations to continue to claim membership and sell under RSPO's sustainable palm oil label is a clear threat to RSPO's credibility, a directive for immediate urgent action should have taken place in accordance with Section 10.2.3 of the RSPO Complaints and Appeals Procedure.			

Placing each of the individual stakeholder narratives in the larger context of the narrative progression of the entire RSPO process allows several informative trends to manifest. To aid understanding, Figure 5 presents a timeline of stakeholder actions between 2016 and 2020 with regards to the IndoAgri case, generated through data from the RSPO website and media publications. Actions by each stakeholder are visualized in their respective columns, in order from left-to-right: IndoAgri, Company, RSPO, NGOs. “Company” refers to major public announcements from private corporations including PepsiCo, Unilever, and Nestle regarding actions taken in response to news of IndoAgri’s labor rights violations and RSPO case.



Figure 5 Timeline of Stakeholder Actions During IndoAgri RSPO Case



The progression and eventual resolution of the controversy as visualized by Figure 5 can be divided into roughly three phases, each characterized by distinct levels of activity from each stakeholder group.

***‘Phase 1’ (between 2016 and 2017):***

In the early months following the publication of the report and the filing of the complaint, the main activity occurs between IndoAgri and the NGOs. Their high level of activity reflects exchanges between IndoAgri and the NGOs as they seek to resolve the conflict between them, sending requests and evidence back-and-forth. During this period, companies and the RSPO are less active, possibly explained by the strategic decision to wait for further substantiation of the NGOs’ claims.

***‘Phase 2’ (between 2017 and 2018):***

The lack of published documents corresponds to meetings and investigations being conducted by the RSPO Complaint Panel (CP) as they gradually deliberate on the appropriate course of action. This period of almost twelve months with no consequential action from any stakeholders is referenced in a critical light in letters from the NGOs, as they continue to call for the RSPO to act quickly and suspend IndoAgri.

***‘Phase 3’ (between 2018 and 2019):***

IndoAgri’s controversy has accumulated attention and discourse, leading to a wave of corporate choices to terminate relationships with IndoAgri. The RSPO also becomes more active as the final decision-maker for the case, delivering its decision to the complainant and the defendant on how IndoAgri needs to make remediation for the grievances at question. If the

Complaint Panel's decision is accepted by the complainant, the complaint is considered closed and the case shifts to monitoring and implementation. However, this is not the case for IndoAgri.

In what could be considered Part Two of 'Phase 3', or post- 'Phase 3', IndoAgri's lack of response and compliance to the Complaint Panel's decision leads to a quickly escalating series of events, as the CP issues a letter of warning on non-compliance, the NGOs appeal for a suspension of RSPO membership for IndoAgri's subsidiaries, IndoAgri announces its choice to resign from RSPO membership, and the RSPO ultimately agrees to suspend IndoAgri's membership. IndoAgri's resignation announcement can be understood as an attempt to preserve control over the narrative of its controversy and preempt the RSPO's suspension decision.

In the aftermath of the termination of PT Lonsum's membership, PT Lonsum's labor abuses continue to be a source of contention in legal, social, and political arenas outside of the RSPO. Most notably, groups like RAN and OPPUK have continued to pursue IndoAgri in the Indonesian court system. After the closure of the RSPO complaint case, PT Lonsum releases the results of its own independent legal review, which concludes that PT Lonsum complies with Indonesian labor laws (Indofood Agri, 2019). In February 2020, Indonesian labor rights activists including OPPUK filed six lawsuits in the Medan Industrial Relations Court against Lonsum for breaching Indonesian labor laws, which went on appeal to the Indonesian Supreme Court in 2021 (Dungey, 2022). The Supreme Court found Lonsum in breach of several casual employment contract terms, and the success of such legal proceedings has helped create momentum for RAN, OPPUK, and two other Indonesian activist groups to pursue two new lawsuits against Lonsum over unlawful dismissals of workers (Dungey, 2022). While the RSPO decision is an influential factor in both the legal prosecution and the change in public and corporate opinion of IndoAgri, the RSPO decision itself is not the force able to drive effective punishment or reform. Instead,

corporations, banks, and governments have responded to the concerns raised by this RSPO complaint case, and it is the actions of these external stakeholders that will affect how IndoAgri and its peers will conduct their future operations.

A complete narrative analysis of RSPO, IndoAgri, and the NGOs within the entire case process proceeds as follows:

The RSPO constructs a narrative of collaboration, framing itself as a mediating force that prioritizes the integrity of the grievance process. Though intended to appease all stakeholders, this narrative of neutrality can counteract the RSPO's legitimacy if it obscures other important priorities promised by the RSPO, such as workers' rights. Notably, no direct bias towards either side emerges through an analysis of the RSPO's documents, but this finding does not discount the fact that biases exist in the RSPO on an institutional or systemic level. The NGOs construct a narrative of opposition to both the RSPO and the defendant, leveraging the RSPO's rules, values, and reputation as reasons for the RSPO to quickly act against the defendant. IndoAgri constructs a narrative of compliance in which it verbalizes agreement with the RSPO and its principles, while avoiding legitimate action to remedy the complaint. Even as dialogue progressed and the case concluded, each of these stakeholders maintained consistent narratives of collaboration, opposition, and compliance respectively.

The larger implications of these findings present both advantages and disadvantages of the RSPO grievance mechanism. Temporal analysis demonstrates that RSPO-related announcements and media attention influence how private businesses like consumer goods companies and financial institutions treat a palm oil supplier. The power and the credibility of the RSPO's brand does influence corporate choices, which in turn can effectively exert punitive power against a palm oil supplier found in violation of RSPO principles. However, the clear distrust and criticism

expressed by the NGOs highlights the limitations of the RSPO. Rather than over-emphasizing dialogue, the RSPO needs to ensure that it also maintains predictability with timely behavior, preserves rights-compatibility by recognizing the human rights problems underlying complaints, and builds legitimacy by engaging more deeply with the interests and concerns of different stakeholder groups.

## **VI. CONCLUSION**

This study takes a granular, case-level approach to studying the RSPO grievance mechanism process, seeking to complement existing scholarship that evaluates the RSPO holistically or within the larger landscape of multistakeholder initiatives. By focusing on narratives communicated via written correspondences, this study produces knowledge from a novel and helpful perspective, supplementing previous work that has relied on interviews and in situ observation as primary sources. Through meticulous examination of the specific documents and details of the IndoAgri case, greater insights can be generated around the different narratives perceived by each stakeholder group, which can be applicable more broadly in understanding the motives of different kinds of stakeholders, including private sector actors, multistakeholder governance institutions, and non-profit advocates. However, published documents do not provide a complete picture of the internal machinations of a stakeholder group, and this paper must acknowledge that it provides a limited—though useful—view of only one dimension of stakeholder perceptions and choices. Additionally, some of this specificity is difficult to generalize, and more work needs to be done to discern whether the actions of RSPO, IndoAgri, and the NGOs in this case are representative of their strategies and approaches as a whole. Some observations made with regards to the RSPO-IndoAgri complaint may be unique to the given event, firm, or time period. Since this paper also assumed that all individual representatives are equivalent to their given

organization, a more granular study on the individual level (ie: IndoAgri CEO versus IndoAgri Sustainability Coordinator, etc) may reveal greater nuance in stakeholder narratives. This research could easily be extended to include more organizations and events to create a more robust picture of supply chain relationships in the palm oil industry.

Using the codes and frameworks outlined in this paper, larger statistical studies could be conducted in the future across a larger collection of textual evidence to identify trends common to many RSPO grievance cases. Causal analyses may be especially informative in clarifying the linkages between different stakeholder actions, such as if the RSPO's decisions and announcements lead to any media or corporate activity. More causal analysis beyond the chronological narrative presented in this paper may also improve understanding of the underlying intentions and decision-making of each stakeholder, and how these intentions manifested. It may also be interesting to evaluate the relative impact of each relevant variable and stakeholder, bringing more insights into how groups strategize. However, the question of what kinds of narratives and modes of influence are utilized by different stakeholders in a multistakeholder initiative is difficult to accurately represent in a causal model, which is why additional qualitative studies continuing the line of questioning presented in this paper are also necessary.

Definitions, metrics, and methods to evaluate the effectiveness of multistakeholder governance and grievance processes are still a subject of lively scholarly debate. Due to the wide range of considerations captured under the standards of the RSPO, it is inherently difficult to evaluate or summarize a single RSPO member's function within the larger organization. When it comes to studying complaint resolution procedures, there is also the problem of variability in the level of transparency and reliability of available documentation. Publicly disclosed documents may be difficult to verify and be subject to the distortions brought about by selection factors.

Individual complaint cases vary dramatically in the level of detail they provide in their disclosures, which presents an additional challenge when attempting meaningful comparative study. Moreover, the complexity of supply chain and stakeholder relationships in an industry like palm oil increases the challenge of discerning each stakeholders' role and influence in a given case. Future research could explore applications of the frameworks and findings covered here to other industries and value chains that face similar challenges of environmental, social, and governance violations.

Growing public and private interest in ESG and multistakeholder governance create an exciting opportunity for new and important scholarship about conflict resolution and grievance remediation. A wide variety of consumer goods manufacturers use palm oil in at least one of their products, including well-known brands like Unilever, Nestle, Hershey's, Colgate-Palmolive, and Procter & Gamble. The environmental and social issues with respect to the palm oil industry have been extremely public in the form of oftentimes attention-grabbing and viral campaigns led by advocacy groups like GreenPeace, who often target these consumer goods brands due to their more consumer-facing nature. This paper's analysis of the RSPO grievance process and how it affects and is affected by different stakeholders thus provides concepts and insights to aid comprehension and interpretation of other past and future conflicts, policies, and news surrounding ESG and various commodities such as palm oil. With more detailed information on the chronology of communications and actions taken during RSPO procedures, firms, non-profits, and civil society agencies can better tailor their advocacy and communication strategies. In conflict resolution processes and multistakeholder governance systems that go beyond palm oil and the RSPO, consideration of the narratives told by each stakeholder group involved provides a productive way to identify conflicts and opportunities to improve governance. Multistakeholder initiatives like the

RSPO are thus called to enact dialogue-based processes that are cognizant of stakeholder perceptions and narratives when seeking to maintain trust and legitimacy.



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