Conversion of Independent Smallholder Subsistence Farms into Plantations

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Proof of compliance with ISCC land use change requirements may be a challenge when smallholder farms are converted into plantations

**Situation**
- Smallholder farms may cover different kinds of crops and age, e.g. rubber, mango, bananas, nuts, palm (often referred to as „mixed garden“ or “shifting agriculture“)
- Ownership of smallholder land may have changed quite often
- Smallholder farms have been bought by plantation companies some time ago
- Documentation of the smallholder farms and land use may be quite rudimentary
- Areas are sometimes left behind for several years when rural communities move
- Time lag between purchase of the land and conversion into plantations may be several years

**Issues**
- Those areas appear on satellite imagery as forested areas indicating a potential violation of Principle 1
- Time lag between original land use and conversion into plantations may result into highly biodiverse land cover in a tropical climate
Land use change (LUC) after 2008 from marginal land to palm plantation is in line with ISCC Principle 1 – e.g. identified by using the GRAS tool.

Source: www.gras-system.org
LUC of No-Go Areas after 2008 violates ISCC Principle 1 – However, shifting from "mixed garden" to plantation is not regarded as LUC

Conversion of No-Go Areas → No certification possible!

Smallholder agriculture to plantation → NO LUC

Challenge
Smallholder agriculture / “mixed garden” often appears on satellite imagery as forested area, i.e. regarded as No-Go Area and indicating a potential violation of Principle 1
Issue in land category determination: Smallholder agriculture is difficult to detect with satellite imagery

- **Land status 2014:**
  - „mixed garden“ / “shifting agriculture“
  - Different kinds of crops, e.g. rubber, bananas, palm
  - Looks like forest on satellite imagery

- **Land status 2016:**
  - Plantation
  - Palm monoculture
  - Easy to detect on satellite imagery

**ISCC audit**
- Documentation of the date when the conversion into plantation took place (e.g. 2015)
- Proof that the land status in 2014 was smallholder agriculture or not land with high biodiversity (in cases where e.g. the land was left idle several years before conversion and the land status may have moved from smallholder agriculture to highly biodiverse land)
Options for proofs regarding LUC after 2008 – Case 1: conversion to plantation has not yet taken place

Proof options

- Report has to be provided together with audit procedures to the ISCC head office by the CB
- Documentation of land status
- History of land development and ownership for the areas including legal compensation documents
- Satellite imagery
- Biodiversity/ HCV reports
- National maps

➢ ISCC will evaluate reports / documentation and contact CB in case of questions
Options for proofs regarding LUC after 2008 – Case 2: conversion to plantation has already taken place

**Proof options**

- Detailed Report to be provided to ISCC prior to the audit
- Affidavit from a recognised NGO confirming that land was under smallholder agriculture before the land use change (e.g. rubber plantation, shifting agriculture)
- Sampling approach for onsite visits for the sites with LUC pictures of the agricultural use
- Compensation documents, shape files
- Pictures (e.g. rubber trees in use)
- Detailed georeference/azimuth high resolution images with a clear description of the cultivated land proving similarity of LUC areas with the reference area
- ISCC and GRAS will review the report and decide if proof is appropriate
Thanks for your attention!

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