

INDIAN SUSTAINABLE
NATURAL RUBBER



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Rubber Board India
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INDIAN SUSTAINABLE NATURAL RUBBER (iSNR) POLICY FRAMEWORK

For Sustainable Natural Rubber Production and
Sourcing in India

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INTRODUCTION

The Indian Sustainable Natural Rubber (iSNR) certification is an initiative by the Rubber Board to promote sustainable practices at every level of the natural rubber supply chain. The iSNR certification aims to drive the adoption of sustainable natural rubber in the global marketplace by addressing critical challenges, including forest and ecosystem conservation, biodiversity loss, human and labor rights violations, and inequities in the supply chain.

To support industry stakeholders in translating these principles into actionable commitments, the Rubber Board has developed comprehensive Policy Components.

The framework provides specific examples to guide appropriate adoption, implementation, and monitoring at each supply chain node.

The iSNR Policy Components are aligned with international guidelines and principles, including the GPSNR guidelines, ISCC standards, UN Global Compact, UN Guiding Principles for Business and Human Rights, the International Bill of Human Rights, and ILO Fundamental Conventions. This alignment ensures the framework is robust and globally relevant, driving measurable progress toward sustainability in the natural rubber industry.



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POLICY COMPONENTS

02. POLICY COMPONENTS

The Natural Rubber will be certified as sustainable by the Rubber Board if it is produced and handled in compliance with the following policy guidelines:

Top Theme	Policy Component
1 Commitment to Legal Compliance including corruption	1.1 Complying with applicable state, national and international laws on human rights, labour, land use, and the environment (example: EU Deforestation Regulation) 1.2 Working against corruption in all of its forms including extortion and bribery.
2 Commitment to no deforestation & protection of High Conservation Value (HCVs) Areas	2.1.1 Producing and sourcing natural rubber in a way that does not contribute to deforestation or degrade High Conservation Values (HCVs). 2.1.2 Natural rubber from areas deforested or where HCVs have been degraded after the cutoff date of 1 April 2019 is considered to be non-conforming with this policy element. An HCV is a biological, ecological, social or cultural value of outstanding significance or critical importance, as defined by Common Guidance for Identification of HCVs. The six categories of HCVs are: HCV 1: Species diversity Concentrations of biological diversity including endemic species, and rare, threatened or endangered species, that are significant at global, regional or national levels. HCV 2: Landscape-level ecosystems, ecosystem mosaics and IFL Large landscape-level ecosystems, ecosystem mosaics and Intact Forest Landscapes (IFL) that are significant at global, regional or national levels, and that contain viable populations of the great majority of the naturally occurring species in natural patterns of distribution and abundance.

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Top Theme	Policy Component
2 Commitment to no deforestation & protection of High Conservation Value (HCVs) Areas	HCV 3: Ecosystems and habitats Rare, threatened, or endangered ecosystems, habitats or refugia.
	HCV 4: Ecosystem services Basic ecosystem services in critical situations, including protection of water catchments and control of erosion of vulnerable soils and slopes.
	HCV 5: Community needs Sites and resources fundamental for satisfying the basic necessities of local communities or indigenous peoples (for livelihoods, health, nutrition, water, etc...), identified through engagement with these communities or indigenous peoples.
	HCV 6: Cultural values Sites, resources, habitats and landscapes of global or national cultural, archaeological or historical significance, and/or of critical cultural, ecological, economic or religious/sacred importance for the traditional cultures of local communities or indigenous peoples, identified through engagement with these local communities or indigenous peoples.
3 Commitment to Healthy Ecosystem & No pollution	3.1. Supporting the long-term protection of natural forests and other ecosystems and their conservation values, and restoring or supporting restoration of deforested and degraded rubber landscapes.
	3.2. Not using open burning/fire in new or ongoing operations for land preparation, land management, waste management, or any other reason other than in justified and documented cases of fire break establishment, waste management for sanitary reasons where public garbage collection is not available, phytosanitary and other emergencies.

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Top Theme	Policy Component
3 Commitment to Healthy Ecosystem & No pollution	3.3. Protecting wildlife, including rare, threatened, endangered and critically endangered species from poaching, over-hunting and habitat loss in areas under company management and supporting wildlife protection activities in areas of influence.
	3.4. Protecting water quantity and quality, preventing water contamination from agricultural and industrial chemicals, and preventing erosion and sedimentation. Application of water conservation measures to reduce water usage and to maintain and improve water quality
	3.5. Protecting soil quality, preventing erosion, nutrient degradation, subsidence and contamination.
	3.6. Preventing the development of or sourcing from natural rubber plantations on peat , regardless of depth, extent, or status (wet, drained or dry).
	3.7. Ensuring the safe disposal of chemical waste generated during rubber farming activities
	3.8. Using only environmentally safe and approved chemicals for plant protection and as fertilizers
	3.9. Adopting safe and eco-friendly methods for clearing old plantations, ensuring minimal disruption to the surrounding ecosystem, and preserving biodiversity.
	3.10. Conducting regular training for farmers and workers on best practices for chemical handling, waste management, and ecosystem conservation.

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Top Theme	Policy Component
4 Commitment to Respecting Rights of Tribals & Indigenous Communities	4.1 Ensuring adherence to internationally recognized human rights standards, as outlined in the UN Guiding Principles on Business and Human Rights (UNGP). This involves taking steps to avoid causing or contributing to human rights violations and addressing any harm that may arise from activities within the natural rubber supply chain. 4.2 Developing and implementing an effective grievance mechanism in line with UNGP principles to address and resolve any adverse impacts resulting from production, sourcing, or related operations. 4.3 Recognizing and safeguarding the customary and cultural rights of tribal and indigenous communities in India, which includes: • Conducting activities in compliance with national laws and policies related to the rights of forest-dependent and tribal communities. • Ensuring secure access to land and resources for communities reliant on natural ecosystems. • Preserving traditional rights for the use of natural resources essential for livelihood, cultural heritage, and religious practices. 4.4 Prior to initiating any activity that may affect the land, resources, or rights of tribal & indigenous communities, securing their Free, Prior, and Informed Consent (FPIC) is mandatory. This includes projects involving plantation development, resource extraction, or infrastructure establishment. FPIC processes must follow culturally appropriate methods and adhere to national and global standards, ensuring communities have the opportunity to approve or reject such activities.

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Top Theme	Policy Component
4 Commitment to Respecting Rights of Tribals & Indigenous Communities	4.5 In cases where operations impact tribal & indigenous communities, appropriate measures should be taken to provide compensation or accommodation, based on the outcomes of the FPIC process. 4.6 Addressing historical grievances where community land or resources were used without proper consent. This requires engaging with the affected communities, government bodies, and independent organizations to find fair and transparent solutions. 4.7 Establishing regular communication channels with tribal & indigenous communities and other affected groups to build trust, ensure transparency, and promote sustainable development outcomes.
5 Commitment to Labour Conventions	5.1 Upholding applicable labour rights and labour laws in the jurisdictions where operating, the UN Guiding Principles on Business and Human Rights, and the intent of the International Labor Organization's eight core conventions. This includes: • Freedom of association and collective bargaining (ILO Convention No. 87 and No. 98) • No forced labour (ILO Convention No. 29 and its 2014 Protocol) • No child labour (ILO Convention No. 138 and No. 182) • Decent living wages • No discrimination (ILO Convention No. 111 and No. 100) • Legal working hours • Safe and healthy workplaces • No abusive practices (ILO Convention No. 105) • Gender equity Safeguards apply to all workers, including contract, temporary and migrant workers.

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Top Theme	Policy Component
6 Commitment to Community Livelihoods	6.1 Ensuring that natural rubber production and processing activities do not negatively impact the livelihoods and well-being of local communities, including their access to essential resources such as clean water, fertile soil, and breathable air.
	6.2 Proactively monitoring and addressing potential environmental impacts, including water pollution, soil contamination, odor, and air quality, to minimize any disruption to the local communities' quality of life.
	6.3 Establishing an accessible and transparent grievance redressal mechanism for local communities to report concerns related to environmental or social impacts, ensuring timely resolution of all complaints.
7 Commitment to International Migrant Workers	7.1 Ensuring that all foreign workers employed in rubber farming possess valid work permits or visas, in full compliance with national immigration and labor laws.
	7.2 Requiring farmers to maintain accurate and updated records, including copies of permits or visas for each foreign worker
	7.3 Ensuring that foreign workers receive equal pay for equal work, consistent with the wages paid to local workers performing similar tasks, and in compliance with national labor laws and international labor standards.
	7.4 Promoting ethical recruitment practices to prevent the employment of undocumented or unauthorized foreign workers within the rubber supply chain.

02. POLICY COMPONENTS

Top Theme	Policy Component
8 Commitment to Tax, Anti-Corruption, Trade & Customs Regulations	8.1 Establishing and enforcing anti-corruption policies to prevent bribery and unethical practices in rubber cultivation and supply chain operations.
	8.2 Implementing measures to ensure compliance with trade and customs regulations, particularly those required for exporting rubber products to international markets, such as the European Union.
	8.3 Maintaining comprehensive documentation of efforts to comply with tax, anti-corruption, trade, and customs regulations, ensuring transparency and accountability.
	8.4 Actively engaging with stakeholders and employees to raise awareness and promote adherence to relevant tax, anti-corruption, trade, and customs regulations.
	8.5 Conducting periodic reviews and audits to monitor compliance with anti-corruption, trade, and customs policies and addressing any gaps or violations.
	8.6 Collaborating with regulatory bodies to stay updated on changes in trade and customs requirements and aligning practices accordingly.

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Top Theme	Policy Component
9 Commitment to Third-Party Rights	9.1 Confirming that the land used for rubber cultivation has not been previously utilized by indigenous peoples or local communities for their basic needs, traditional practices, or cultural activities without proper consultation and agreements.
	9.2 Establishing and maintaining formal systems to address and resolve grievances or complaints from local communities or third parties in a timely and transparent manner.
	9.3 Ensuring that rubber farming activities do not restrict local communities' access to shared resources such as water, grazing land, or forest products, and taking corrective action if such restrictions are identified.
	9.4 Providing alternative arrangements or mitigation measures in cases where farming activities impact shared resources, in consultation with affected communities.
10 Commitment to Record-Keeping & Documentation	10.1 All entities in the supply chain must document detailed information about the origin, quantity, and movement of natural rubber at every stage of production, processing and handling.
	10.2 All Natural Rubber transaction in the supply chain must be documented, specifying the volume and supporting documents, such as invoices and shipping records, must be maintained.
	10.3 Supply chain stakeholders except farmers must keep the records for a minimum of five years to allow for retrospective verification and auditing.
	10.4 Supply chain participants must receive training on bookkeeping requirements to ensure accurate and consistent recordkeeping.

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Top Theme	Policy Component
11 Commitment to Supply Chain Assessment and Traceability	11.1 Conducting detailed assessments of all stages in the supply chain to ensure compliance with sustainability and traceability requirements.
	11.2 Establishing systems to track each unit of natural rubber back to its specific origin.
	11.3 Recording and maintaining geocoordinates of origin points for all raw materials used in the supply chain.
	11.4 Ensuring all supply chain entities adhere to defined procedures for segregation, storage, and transportation to maintain the traceability of materials.
	11.5 Conducting regular audits to verify traceability and compliance across the supply chain.
12 Commitment to Monitoring and Reporting on Progress Towards, and Conformance with, Policy Components	12.1 Conducting regular monitoring across all stages of the supply chain to ensure compliance with iSNR guidelines.
	12.2 Implementing periodic audits to assess adherence to policy components and identify any non-conformances.

APPENDIX 1: DEFINITIONS

Child labour	Work that is likely to be hazardous or to interfere with the child’s education, or to be harmful to the child’s health or physical, mental, spiritual, moral or social development. Not all work done by children should be classified as child labour that is to be targeted for elimination. Children’s or adolescents’ participation in work that does not affect their health and personal development or interfere with their schooling, is generally regarded as being something positive (according to International Labour Organisation).
Conversion	Change of a natural ecosystem to another land use or profound change in a natural ecosystem’s species composition, structure, or function. • Deforestation is one form of conversion (conversion of natural forests). • Conversion includes severe degradation or the introduction of management practices that result in substantial and sustained change in the ecosystem’s former species composition, structure, or function. • Change to natural ecosystems that meets this definition is considered to be conversion regardless of whether or not it is legal.
Deforestation	Loss of natural forest as a result of: i) conversion to agriculture or other non-forest land use; ii) conversion to a tree plantation; or iii) severe and sustained degradation. • This definition pertains to no-deforestation supply chain commitments, which generally focus on preventing the conversion of natural forests (primary forests and HCV areas).. • Loss of natural forest that meets this definition is considered to be deforestation regardless of whether or not it is legal. • The Accountability Framework’s definition of deforestation signifies “gross deforestation” of natural forest where “gross” is used in the sense of “total; aggregate; without deduction for reforestation or other offset.”

Cutoff date	(Related to no-deforestation and no-conversion commitments): The date after which deforestation or conversion renders a given area or production unit non-compliant with no-deforestation or no-conversion commitments, respectively.
Equal Pay	All work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily (according to International Labour Organisation).
Forced labour	All work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily (according to International Labour Organisation).
Forest degradation	Changes within a natural ecosystem that significantly and negatively affect its species composition, structure, and/or function and reduce the ecosystem's capacity to supply products, support biodiversity, and/or deliver ecosystem services. Degradation may be considered conversion if it: • is large-scale and progressive or enduring; • alters ecosystem composition, structure, and function to the extent that regeneration to a previous state is unlikely; or • leads to a change in land use (e.g., to agriculture or other use that is not a natural forest or other natural ecosystem).
Freedom of association	The right for workers and employers to establish and join organisations of their own choosing without previous authorization (according to International Labour Organisation).
Free Prior and Informed Consent (FPIC)	A process ensuring that indigenous peoples or local communities are consulted and have the opportunity to accept or reject proposed activities on their land, using culturally appropriate and internationally recognized methods.

Local community

A group of people living in a specific area, sharing concerns about local facilities, services, and the environment. They may hold cultural, historical, or livelihood ties to the land and natural resources, often managing them through customary practices and tenure systems. Like Indigenous Peoples, local communities have the right to give or withhold Free, Prior, and Informed Consent (FPIC) for activities affecting their land and resources.(FPIC; see definition).

Natural ecosystem

A natural ecosystem is one that closely resembles the species composition, structure, and ecological function of ecosystems found in a given area without significant human interference. It includes ecosystems managed by humans, as long as much of their natural characteristics are maintained.

Natural ecosystems include:

- Largely “pristine” natural ecosystems that have not been subject to major human impacts in recent history
- Regenerated natural ecosystems that were subject to major impacts in the past (for instance by agriculture, livestock raising, tree plantations, or intensive logging) but where the main causes of impact have ceased or greatly diminished and the ecosystem has attained species composition, structure and ecological function similar to prior or other contemporary natural ecosystems
- Managed natural ecosystems (including many ecosystems that could be referred to as “semi-natural”) where much of the ecosystem’s composition, structure, and ecological function are present; this includes managed natural forests as well as native grasslands or rangelands that are, or have historically been, grazed by livestock
- Natural ecosystems that have been partially degraded by anthropogenic or natural causes (e.g., harvesting, fire, climate change, invasive species, or others) but where the land has not been converted to another use and where much of the ecosystem’s composition, structure, and ecological function remain present or are expected to regenerate naturally or by management for ecological restoration.

Natural forest

A forest that is a natural ecosystem.

1. Natural forests possess many or most of the characteristics of a forest native to the given site, including species composition, structure, and ecological function. Natural forests include:
 - Primary forests that have not been subject to major human impacts in recent history
 - Regenerated (second-growth) forests that were subject to major impacts in the past (for instance by agriculture, livestock raising, tree plantations, or intensive logging) but where the main causes of impact have ceased or greatly diminished and the ecosystem has attained much of the species composition, structure, and ecological function of prior or other contemporary natural ecosystems.
 - Managed natural forests where much of the ecosystem's composition, structure, and ecological function exist in the presence of activities such as:
 - Harvesting of timber or other forest products, including management to promote high-value species
 - Low intensity, small-scale cultivation within the forest, such as less-intensive forms of swidden agriculture in a forest mosaic
 - Forests that have been partially degraded by anthropogenic or natural causes (e.g., harvesting, fire, climate change, invasive species, or others) but where the land has not been converted to another use and where degradation does not result in the sustained reduction of tree cover below the thresholds that define a forest or sustained loss of other main elements of ecosystem composition, structure, and ecological function.
2. The categories “natural forest” and “tree plantation” are mutually exclusive, though in some cases the distinction may be nuanced. Please see the [Operational Guidance on Applying the Definitions Related to Deforestation, Conversion, and Protection of Ecosystems](#) for further discussion of boundary cases.
3. For the purpose of corporate no-deforestation commitments, the focus is on preventing the conversion of natural forests.

Peat	A soil with cumulative organic layer(s) comprising more than half of the upper 80 cm or 100 cm of the soil surface containing 35% or more of organic matter (35% or more Loss on Ignition) or 18% or more organic carbon.
Protected area	Areas especially dedicated to the protection and maintenance of biological diversity, and of natural and associated cultural resources, and managed through legal or other effective means. Countries may use different legal terminologies to name and define protected areas covered under relevant national legal requirements.
Supply chain transparency	• Transparency refers to the capture and transference of ‘high-level’ information along the supply chain. • Supply chain transparency is an all-in strategy, requiring harmonious agreement of various moving parties. Strategic transparency is contingent upon the gathering of existing data, and building a knowledge base for existing supply chain activities and suppliers. • Supply chain transparency requires companies to know what is happening upstream in the supply chain and to communicate this knowledge both internally and externally.
Target date	The date by which a given company (or other commitment- or policy-issuing entity) intends to have fully implemented its commitment or policy.
Traceability	The ability to track a product’s journey through the supply chain back to its origin, including geocoordinates for raw material sources.

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