

**SUSTAINABILITY GOVERNANCE FRAMEWORK
FOR MALAYSIA-CHINA PALM OIL SUPPLY
CHAIN UNDER THE GREEN BELT AND
ROAD INITIATIVE**



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UNIVERSITI KEBANGSAAN MALAYSIA

SUSTAINABILITY GOVERNANCE FRAMEWORK FOR MALAYSIA-CHINA
PALM OIL SUPPLY CHAIN UNDER THE GREEN BELT AND
ROAD INITIATIVE

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TADBIR URUS KELESTARIAN UNTUK RANTAIAN BEKALAN MINYAK
SAWIT MALAYSIA-CHINA DI BAWAH INISIATIF
JALUR DAN LALUAN HIJAU

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BANGI
2026

DECLARATION

I hereby declare that the work in this thesis is my own except for quotations and summaries which have been duly acknowledged.

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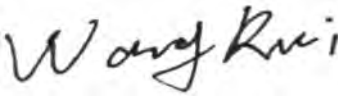
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ABSTRACT

Palm oil, extensively used across industries, is central to global agricultural trade, yet it faces growing sustainability concerns and scrutiny over its environmental and social impacts. As a major importer, China plays a crucial role in shaping the sustainability agenda for palm oil. This study explores the role of the palm oil supply chain within the green supply chain system of the Belt and Road Initiative, aiming to enhance the flow of sustainable palm oil into China by examining the performance of rules, roles and organisations in this agenda. The research objectives, aligned with the aforementioned purposes, are as follows: (i) to identify the issues and challenges in implementing sustainable palm oil within the Malaysia-China supply chain; (ii) to analyse the rules, roles and organisations involved in palm oil sustainability governance within the Malaysia-China supply chain and (iii) to formulate a sustainability governance framework for the Malaysia-China palm oil supply chain under the Green Belt and Road Initiative. This study adopted a qualitative research approach to investigate challenges related to sustainable palm oil in China, including weak enforcement of standards, fragmented institutions and limited stakeholder collaboration. These findings were obtained based on: firstly, these issues were identified through document content analysis of government policies, institutional frameworks, third-party studies, NGO surveys, ESG reports, palm oil sustainability certification standards and China's Green Supply Chain Certification Guidelines. Secondly, interviews were conducted to analyse the positioning of rules, roles and organisations in palm oil sustainability governance, with participants both inside and outside the supply chain serving as informants, thereby enhancing the credibility of the findings. Thirdly, a focus group discussion was conducted to gather insights towards the formulation of the sustainability governance framework, with recommendations from discussants guiding the exploration of this study. Participants in interviews and focus group discussions were primarily based in China, with staff members from certain foreign organisations operating within China also being invited. These comprised industry stakeholders, government bodies, think tanks, international institutions and non-governmental organisations. The data acquired was subjected to thematic analysis using Atlas.ti. Applying Institutional Theory, specifically coercive, mimetic and normative isomorphism, this study examines the root causes of these challenges and proposes strategies to address them. Meanwhile, the perspectives of path dependence, interdependence and resilience from Evolutionary Governance Theory complement the institutional analysis and contribute to the overall governance agenda. Hence, this study proposes a governance framework aligned with the Green Belt and Road Initiative, integrating national, regional and international institutions as layered and interconnected governance systems rather than as isolated regulatory bodies. This offers a novel governance pathway for palm oil sustainability, providing insights into the adaptive regulatory and institutional mechanisms required to align sustainability objectives with global trade practices.

TADBIR URUS KELESTARIAN UNTUK RANTAIAN BEKALAN MINYAK SAWIT MALAYSIA-CHINA DI BAWAH INISIATIF JALUR DAN LALUAN HIJAU

Minyak kelapa sawit yang digunakan secara meluas merentasi industri, adalah teras kepada perdagangan pertanian global, namun ia menghadapi kebimbangan kelestarian yang semakin meningkat, terutamanya kesan alam sekitar dan sosialnya. Sebagai pengimport utama, China memainkan peranan penting dalam membentuk agenda kelestarian minyak kelapa sawit. Kajian ini meneroka peranan rantai bekalan minyak kelapa sawit dalam sistem rantai bekalan Green Belt and Road Initiative, bertujuan untuk meningkatkan aliran minyak kelapa sawit lestari ke China, serta mengkaji prestasi peraturan, peranan dan organisasi dalam agenda ini. Objektif penyelidikan, sejajar dengan tujuan yang dinyatakan di atas, adalah seperti berikut: (i) mengenal pasti isu dan cabaran dalam melaksanakan minyak kelapa sawit lestari dalam rantai bekalan Malaysia-China; (ii) menganalisis peraturan, peranan dan organisasi yang terlibat dalam governans kelestarian minyak kelapa sawit dalam rantai bekalan Malaysia-China dan (iii) membentuk kerangka governans kelestarian bagi rantai bekalan minyak kelapa sawit Malaysia-China di bawah Green Belt and Road Initiative. Kajian ini menggunakan pendekatan penyelidikan kualitatif untuk menyiasat cabaran berkaitan minyak kelapa sawit lestari di China, termasuk penguatkuasaan piawaian yang lemah, institusi berpecah-belah dan kerjasama pihak berkepentingan yang terhad. Dapatan ini diperoleh berdasarkan: pertama, isu- isu ini dikenal pasti melalui analisis kandungan dokumen dasar kerajaan, kerangka institusi, kajian pihak ketiga, kajian NGO, laporan ESG, piawaian pensijilan kelestarian minyak sawit dan Garis Panduan Pensijilan Rantai Bekalan Hijau China. Kedua, temu bual telah dijalankan untuk menganalisis kedudukan peraturan, peranan dan organisasi dalam governans kelestarian minyak kelapa sawit, dengan peserta dalam dan luar rantai bekalan sebagai informan, sekaligus meningkatkan kredibiliti penemuan. Ketiga, perbincangan kumpulan berfokus telah dijalankan untuk mengumpul pandangan ke arah pembentukan kerangka governans kelestarian dengan cadangan daripada peserta yang membimbing penerokaan kajian ini. Peserta dalam temubual dan perbincangan Kumpulan terfokus sebagian besar berfokus di China, dengan staf dari beberapa organisasi asing yang beroperasi di China juga diundang. Data yang diperoleh dianalisis secara tematik menggunakan Atlas.ti. Mengaplikasikan Teori Institusi, khususnya isomorfisme paksaan, mimetik dan normatif, kajian ini mengkaji punca cabaran ini dan mencadangkan strategi untuk menanganinya. Sementara itu, perspektif pergantungan laluan, saling kerbergantungan dan daya tahan daripada Teori Governans Berevolusi melengkapkan analisis institusi dan menyumbang kepada keseluruhan agenda governans. Oleh itu, kajian ini mencadangkan kerangka governans yang diselaraskan dengan Green Belt and Road Initiative, menyepadukan institusi nasional, serantau dan antarabangsa sebagai sistem governans berlapis dan saling berkaitan dan bukannya sebagai badan kawal selia yang terpencil. Ini menawarkan laluan governans baharu untuk kelestarian minyak kelapa sawit, memberikan pandangan tentang mekanisme kawal selia dan institusi penyesuaian yang diperlukan untuk menyelaraskan objektif kelestarian dengan amalan perdagangan global.

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LIST OF ABBREVIATIONS

ACEF.	All-China Environmental Federation
ACFTA.	ASEAN-China Free Trade Agreement
ADB.	Asian Development Bank
A Dec.	Amsterdam Declaration
ADP.	Amsterdam Declarations Partnership
AIIB.	Asian Infrastructure Investment Bank
APA.	The American Psychological Association
APT.	ASEAN Plus Three
APEC.	Asia-Pacific Economic Cooperation
APGSCN.	Asia-Pacific Green Supply Chain Cooperation Network
ASEAN.	Association of Southeast Asian Nations
BRI.	Belt and Road Initiative
B&R.	Belt and Road
BRF.	Belt and Road Forum for International Cooperation
BRP.	Belt and Road Portal
BREE.	Belt and Road Economic & Environmental Cooperation Forum
BRIGC.	The BRI International Green Development Coalition
CAITEC.	Chinese Academy of International Trade and Economic Cooperation
CAF.	Development Bank of Latin America
CAFC.	Corporate Average Fuel Consumption
CB.	Certification Body
CBD.	Global Convention on Biological Diversity
CCFA.	China Chain Store and Franchise Association
CCCC.	China Communications Construction (Group) Co Ltd
CCICED.	China Council for International Cooperation on Environment and Development
CDP.	Carbon Disclosure Project

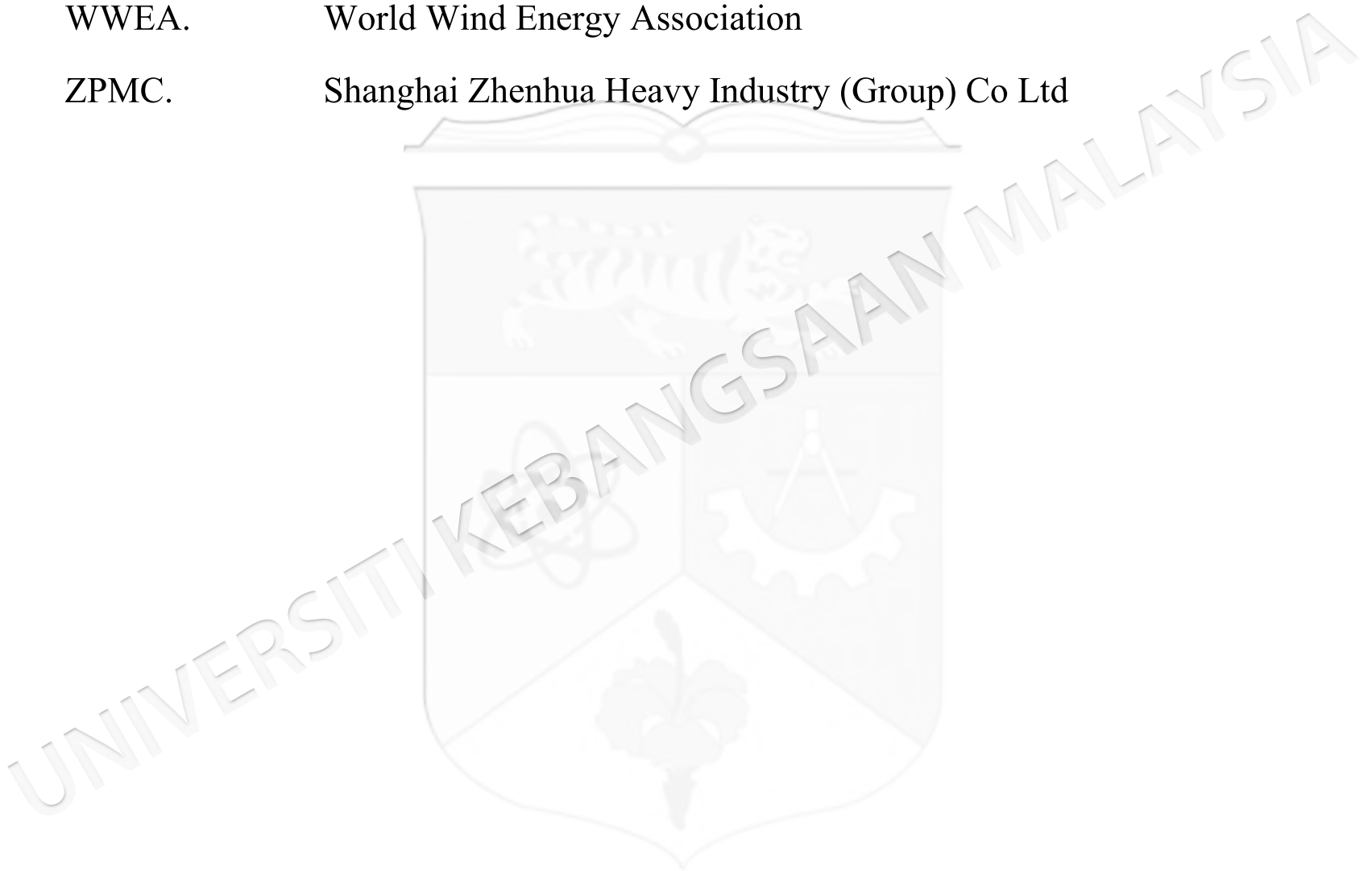
CFNA.	China Chamber of Commerce of Import & Export of Foodstuffs, Native Produce and Animal By-products
CFDR.	Continuous Financial Disclosure Regulation
CGSA.	China Green Supply Chain Alliance
CGSC.	China Green Supply Chain
CGF.	Consumer Goods Forum
CGFCC.	China Green Food Certification Center
CIFOR.	Center for International Forestry Research
CNCEC.	China National Chemical Engineering Heavy-Machinery Co Ltd
COP15.	Fifteenth Meeting of the Conference of the Parties to the Convention on Biological Diversity
COFCO.	China Oil & Foodstuffs Corporation
CPTPP.	Comprehensive and Progressive Agreement for Trans-Pacific Partnership
CPO.	Crude Palm Oil
CPOPC.	Council of Palm Oil Producing Countries
CSPO.	Sustainable Palm Oil Certification
CSPOA.	China Sustainable Palm Oil Alliance
CSR.	Corporate Social Responsibility
E. G.	Exempli gratia
ETC.	Et cetera
EC.	European Commission
EDF.	US Environmental Defense Fund
EGT.	Evolutionary Governance Theory
EIA.	Environmental Impact Assessment
EP.	Equator Principles
EPOA.	European Palm Oil Alliance
ERIA.	Economic Research Institute for ASEAN and East Asia
ESM(S).	Environmental & Social Management (System)
ESG.	Environmental, Social and Governance

EU.	European Union
FPIC.	Free, Prior and Informed Consent
FAO.	Food and Agricultural Organization of the United Nations
FIRI.	Foresight Industrial Research Institute
FTZ.	Free Trade Zone
FTA.	Free Trade Agreement
FTAAP.	Free Trade Area of the Asia-Pacific
FSC.	Forest Stewardship Council
GAP.	Good Agricultural Practices
GB.	Guo Biao
GDP.	Gross Domestic Product
GDG.	Green Development Guidelines for Project
GHG.	Greenhouse Gases
GIP.	Green Investment Principle
GVC.	Global Value Chains
HCV.	High Conservation Value
IEC.	International Electrotechnical Commission/International Electrotechnical Association
I. E.	Id est
IFC.	International Finance Corporation
IMF.	International Monetary Fund
InFIT.	International Forest Investment and Trade
IPOA/GAPKI.	Indonesian Palm Oil Association/ Gabungan Pengusaha Kelapa Sawit Indonesia
IPE.	International Public Environmental Research Centre
IPOP.	Indonesian Palm Oil Pledge
IRENA.	International Renewable Energy Agency
ISPO.	Indonesian Sustainable Palm Oil
ISCC.	International Sustainability and Carbon Certification
ISO.	International Standardization Organizations

ISS.	Institute of Social Studies
ITC.	International Trade Centre
JETRO.	Japan External Trade Organization
KIEP.	Korea Institute for International Economic Policy
LC.	Licensed corporations
LCA.	Life Cycle Assessment
MEE.	Ministry of Ecology and Environment
MIDA.	Malaysian Investment Development Authority
MIIT	Ministry of Industry and Information Technology
MOST.	Ministry of Science and Technology
MOU.	Memorandum of Understanding
MOA.	Ministry of Agriculture and Rural Affairs
MOF.	Ministry of Finance
MOFCOM.	Ministry of Commerce
MPOC.	Malaysian Palm Oil Council
MPOB.	Malaysian Palm Oil Board
MPOCC.	Malaysian Palm Oil Certification Council
MOPGCF.	Malaysian Palm Oil Green Conservation Foundation
MSPO.	Malaysian Sustainable Palm Oil
MT.	Metric Ton
MYR.	Malaysian Ringgit
NBS.	National Bureau of Statistics
NDRC.	National Development and Reform Commission
NDPE.	No Deforestation, No Peat, No Exploitation policy
NGO.	Non-Governmental Organisation
NPC.	National People's Congress
NRDC.	Natural Resources Defense Council
NYDF.	New York Declaration on Forests
OECD.	Organisation for Economic Co-operation and Development

OJK.	Indonesian Financial Services Authority
P&C.	Principles and Criteria
RCEP.	Regional Comprehensive Economic Partnership
REDII.	Renewable Energy Directive II
REDD+.	Reducing Emissions from Deforestation and forest Degradation, plus the sustainable management of forests, and the conservation and enhancement of forest carbon stocks
RVC.	Regional Value Chain
RSPO.	Roundtable on Sustainable Palm Oil
SCP.	Sustainable Consumption and Production
SC.	State Council
SCC.	Soft Commodities Compact
SDGs.	United Nations 2030 Sustainable Development Goals
SEC.	Securities and Exchange Commission
S&P.	Standard & Poor's
SFC.	Securities and Futures Commission
SFA.	State Forestry Administration
SIA.	Social Impact Assessment
SMEs.	Small and Medium Enterprises
SPOM.	Sustainable Palm Oil Manifesto
SPCM.	Supreme People's Court Monitor
SSI.	State of Sustainability Initiatives
UKCGFC.	UK-China Green Finance Centre
UN.	United Nations
UNDP.	United Nations Development Programme
UNEP.	United Nations Environment Programme
UNPRI.	UN Responsible Investment Initiative
UNFCCC.	United Nations Framework Convention on Climate Change
US.	United States
USDA.	United States Department of Agriculture

USEPA.	U.S. Environmental Protection Agency
VUCA.	Volatile, Uncertain, Complex, Uncertain
WBCSD.	World Business Council for Sustainable Development
WB.	World Bank
WEF.	World Economic Forum
WEPR.	Beijing WEP ECO-TECH Development Research Institute
WRI.	World Resources Institute
WWF.	World Wildlife Fund
WWEA.	World Wind Energy Association
ZPMC.	Shanghai Zhenhua Heavy Industry (Group) Co Ltd



CHAPTER I

INTRODUCTION

1.1 RESEARCH BACKGROUND

1.1.1 Palm Oil Industry

Palm oil, which originated in West Africa over 3,000 years ago (RSPO 2013), is a versatile vegetable oil known for its broad range of applications. Its downstream products are prevalent in various markets, ranging from foods and cosmetics to biofuels (RSPO 2020). As illustrated in Figure 1.1, palm oil holds a significant advantage in terms of yield and land use efficiency compared to other vegetable oils, offering exceptional oil yields per hectare. Palm oil has established itself as the most cost-effective vegetable oil on the global market (Rival & Levang 2014), requiring only 0.26 hectares of land to produce one tonne of oil, compared to 1.52 hectares for rapeseed, 2.0 hectares for sunflower and 2.22 hectares for soybean, respectively (MPOC 2021).

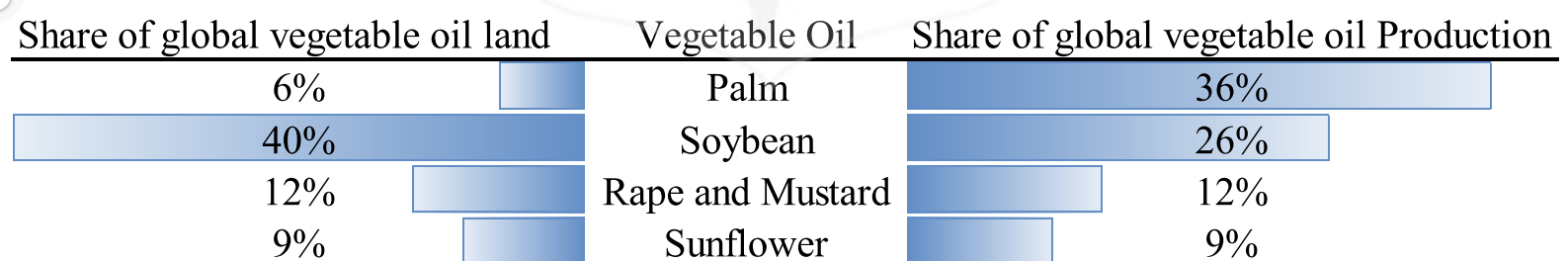


Figure 1.1 Share of global vegetable oil production

Source: Statista, 2020

However, palm oil plantations are frequently associated with deforestation, biodiversity loss, peatland conversion, illegal labour practices and other issues (Savilaakso et al. 2014; Vijay et al. 2016). As of 2018, palm oil plantations covered over 19 million hectares globally, with Indonesia (6.8 million hectares) and Malaysia

(5.2 million hectares) accounting for 63 per cent of the total land area. According to the World Bank (2019), Malaysia's forest coverage decreased from 59.93 per cent in 2000 to 58.48 per cent in 2018, with palm oil plantations contributing to 46 per cent of this decline. The conversion of forests into palm oil plantations has resulted in an 83 per cent reduction in species richness (UNDP 2020), while carbon emissions from deforestation and peatland degradation significantly contribute to climate change (Miettinen et al. 2013).

According to data from the United States Department of Agriculture (USDA), in 2023 Indonesia exported 29.5 million tonnes of palm oil, accounting for a 56 percent market share; Malaysia exported 16.2 million tonnes of palm oil, representing a 31 percent market share; and Thailand ranked third with exports of 2.4 million tonnes of palm oil, holding a 4 percent market share. Indonesia and Malaysia, the world's largest palm oil producers and exporters (Figure 1.2), have each developed national palm oil certification schemes, i.e. Indonesian Sustainable Palm Oil (ISPO) and Malaysian Sustainable Palm Oil (MSPO), to address environmental concerns associated with palm oil production (Gaveau et al. 2016). The Roundtable on Sustainable Palm Oil (RSPO), endorsed by several governments, plays a pivotal role in promoting sustainability within the palm oil sector (Schouten & Glasbergen 2011). Formed under the RSPO's framework, both ISPO and MSPO have taken steps to mitigate deforestation, reduce peatland degradation and minimise CO₂ emissions, thereby addressing the sector's negative impacts on climate (Lister & Dauvergne 2014).

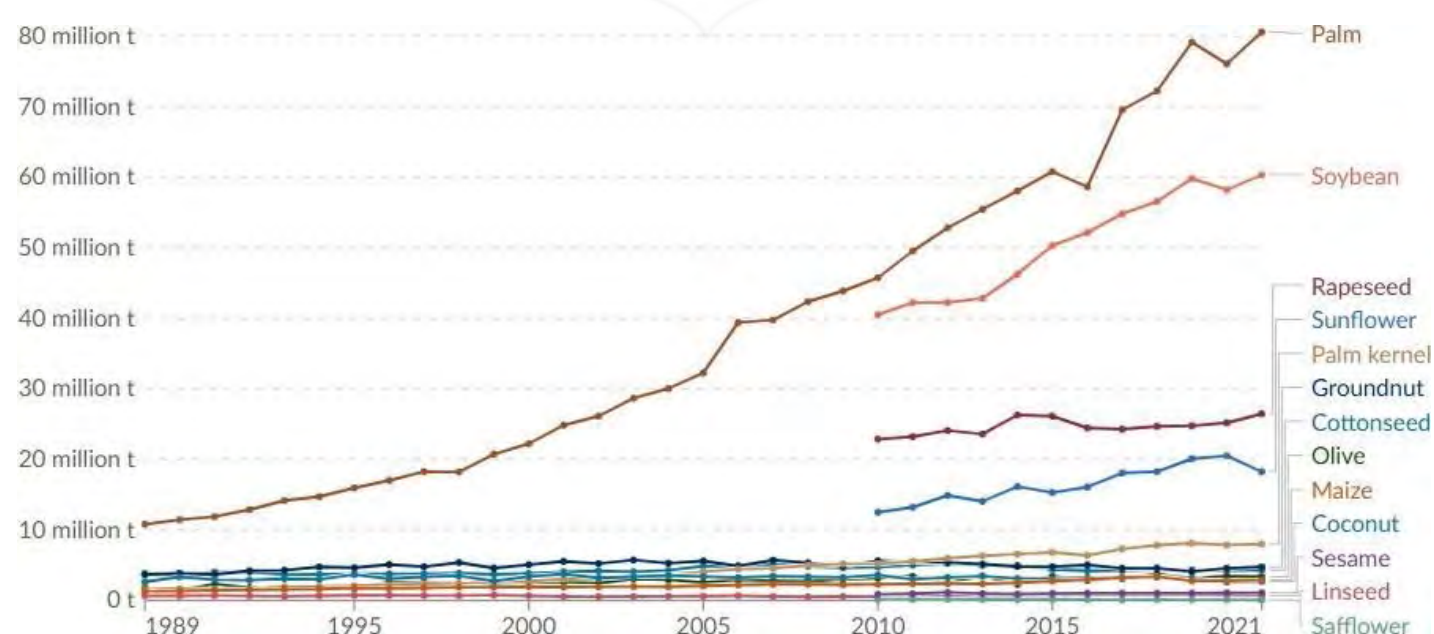


Figure 1.2 Global vegetable oil production comparison for 1989-2021

Source: Food and Agriculture Organization of the United Nations 2022

The RSPO, initiated by the World Wildlife Fund (WWF), engages seven broad categories of palm oil stakeholders, including financial institutions, processors, traders, food manufacturers, retailers, NGOs and consulting firms (RSPO 2021). Among the earliest participants were the Malaysian Palm Oil Association, Migros, Aarhus United UK Ltd, Karlshamns AB (Sweden), Sainsbury's, Unilever (Netherlands) and Golden Hope Plantations Berhad. These stakeholders were convened by the WWF in 2002, with subsequent involvement from other entities like The Body Shop (UK), Pacific Rim Palm Oil Ltd (Singapore) and Loders Croklaan (Netherlands) (Nikoloyuk et al. 2010). The first Roundtable on Sustainable Palm Oil was held in 2003, in Kuala Lumpur, Malaysia, with 200 participants from 16 countries in attendance (RSPO 2021).

India, China, the European Union (EU) and Indonesia (Figure 1.3) consume approximately 50 per cent of global palm oil production annually (UNDP 2020). In December 2019, the European Union launched the Green New Deal, setting new requirements to promote the transformation of supply chains towards sustainability. The development of sustainable supply chains is expected to become a key element in achieving carbon neutrality across various industries, with greater collaboration between upstream and downstream industry players in response to increasingly stringent environmental regulations (CDP 2021). The greening of the entire product cycle, including design, material selection, procurement, manufacturing, packaging, transportation and disposal, is essential to achieving these goals.

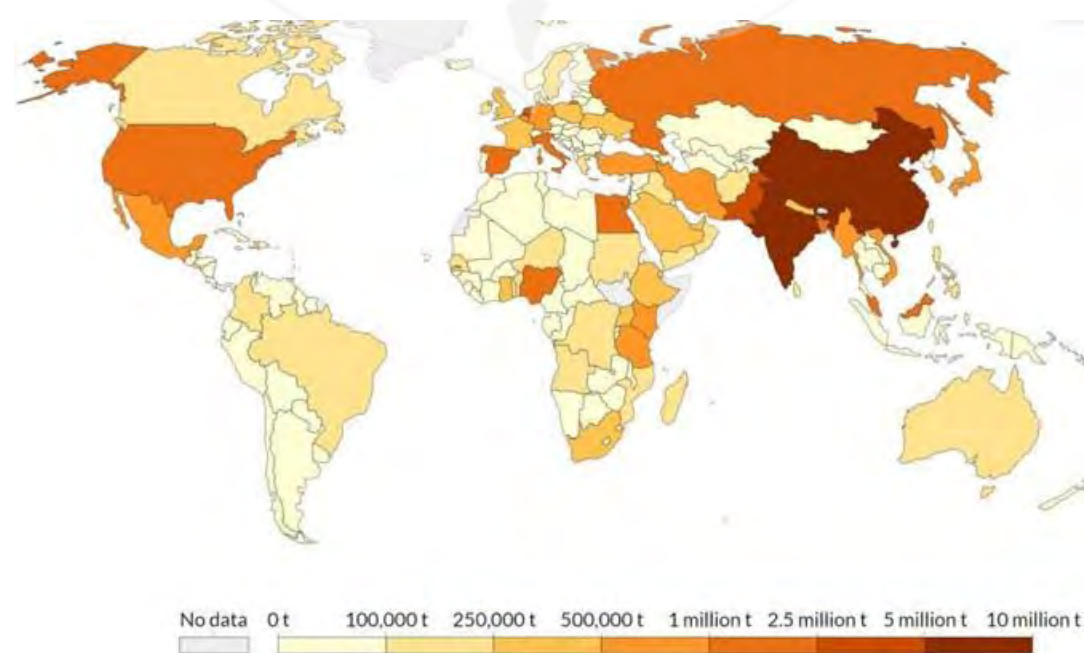


Figure 1.3 Share of world palm oil consumption by country, 2019

Source: Our World in Data, 2022

In 2013, the China Chamber of Commerce of Import & Export of Foodstuffs, Native Produce and Animal By-products (CFNA) took similar steps, partnering with the RSPO and WWF to establish the China Sustainable Palm Oil Alliance (CSPOA). This initiative marked China's first engagement in shaping sustainable palm oil standards. By 2021, the CSPOA had 15 members, including WWF Beijing, CFNA, RSPO, AAK, Musim-Mas, Cargill, Louis Dreyfus, LDC, HSBC, L'Oréal, Ming Fai, Mars, Barry Callebaut, Bureau Veritas, WEF Tropical Rainforest Alliance and the Centre for Global Environmental Information and Research (RSPO 2022).

In 2015, China launched the Guide for Overseas Investment and Production of Sustainable Palm Oil by Chinese Enterprises to guide the activities of its palm oil companies across the transnational supply chain, further reinforcing its commitment to sustainability. In 2017, the first RSPO China Forum was held, and in 2018, CFNA and RSPO signed a Memorandum of Understanding (MoU), establishing a five-year strategic partnership to enhance awareness of RSPO standards, advocate for sustainable development within the palm oil sector and promote sustainable palm oil programmes (RSPO 2020). At the China Sustainable Palm Oil Forum and the 6th RSPO China Forum in 2022, RSPO emphasised the importance of promoting sustainability governance across the supply chain, noting that sustainable development in the palm oil sector is gaining increased recognition (RSPO 2024).

China's pledge to peak carbon emissions by 2030 and achieve carbon neutrality by 2060, announced during the Fifteenth Meeting of the Conference of the Parties to the Convention on Biological Diversity (COP15) in 2020, underscores the need for robust policies to meet both domestic and international greenhouse gas (GHG) emissions targets. China's '30.60' target (SC 2021) stresses the importance of information disclosure in improving enterprise sustainability. Identifying risks and opportunities, as well as assessing business strategies, are critical elements in enhancing governance systems within enterprises. Given the evolving market dynamics and escalating climate crisis, transforming governance systems to improve value chains has become increasingly urgent. China is poised to assume a leadership role in addressing environmental challenges, particularly those associated with the palm oil and timber trades and in preserving Asia's vital forests (CDP 2021).

The role of the supply chain in the consumption and production of sustainable palm oil products in China must be clearly defined, and collaborative efforts across multiple sectors are essential to finding governance tools that align with global standards while meeting China's specific needs. This research focuses on the palm oil industry, which is positioned to showcase China's environmental stewardship in the future.

1.1.2 Palm Oil in Malaysia

Oil palms were introduced to Malaysia in the late 19th century, with large-scale commercial cultivation commencing in 1917. In 2023, Malaysia's refined palm oil exports reached 11.69 million tonnes, accounting for 76 per cent of total exports, while crude palm oil exports constituted only 24 percent (USDA 2024). The country possessed 5.90 million hectares of oil palm plantations as of the end of 2023 (MPOB 2023). Malaysia plays a pivotal role in addressing the growing global demand for edible vegetable oils and grease, currently ranking as the second-largest palm oil exporter globally, after Indonesia. Malaysian palm oil is exported to over 150 nations, including major markets such as China, the European Union (EU), Pakistan, the United States and India. The country accounts for 25.8 per cent of global palm oil production and 34.3 per cent of exports (WWF 2020). In 2018, Malaysia exported approximately 15.4 million metric tonnes of palm oil and related products, generating revenue of MYR 67.52 billion, with the sector contributing around MYR 37.6 billion to the nation's GDP. By 2020, palm oil's contribution to Malaysia's GDP was 2.7 per cent (Figure 1.4). The palm oil industry is considered a key driver of poverty alleviation, employment generation and economic growth in the country, with around 500,000 direct employees in 2019 and indirect benefits affecting over 1 million people (WWF 2021).

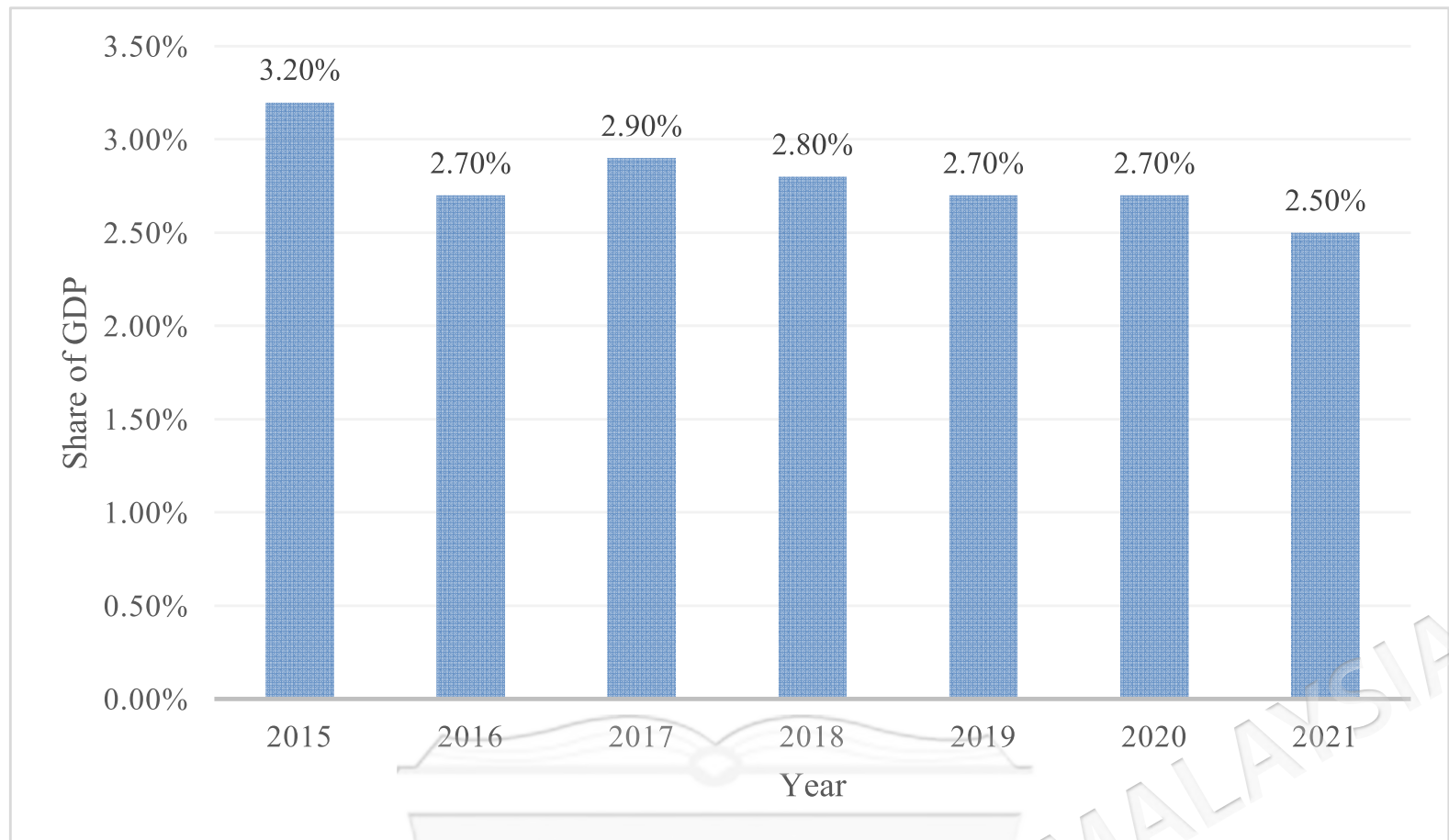


Figure 1.4 Palm oil industry as a share of GDP in Malaysia 2015-2021

Source: Statista, 2023

However, challenges lie ahead, particularly in key markets. The EU, Malaysia's third-largest and most valuable export market for palm oil, has introduced regulations aiming to reduce palm oil use in biofuels to zero by 2030. The EU's ban on palm oil as a biofuel additive, along with its plans to phase it out completely, could potentially reduce exports from Malaysia and Indonesia by about 6.5 million tonnes, equating to around 9 per cent of total global palm oil output (Ardian et al. 2019). The loss of the EU market not only threatens Malaysia's revenue but could also damage its international reputation. India, another key market, has announced additional tariffs on palm oil starting in 2019, further complicating Malaysia's export landscape.

In response to these challenges, the Malaysian Palm Oil Board (MPOB) adheres to the Certified Sustainable Palm Oil (CSPO) scheme under the Roundtable on Sustainable Palm Oil (RSPO), authorising the Malaysian Palm Oil Certification Council (MPOCC) to certify sustainable palm oil. The Malaysian Sustainable Palm Oil (MSPO) certification scheme, managed by MPOCC, serves to enhance the environmental, social and governance (ESG) aspects of palm oil production, including adherence to Good Agricultural Practices (GAP). The MSPO scheme encompasses the entire palm oil

supply chain, including independent and organised smallholders, estates and mills (Eltayeb et al. 2011). This certification aligns palm oil production with existing national laws and regulations (MPOB 2023), ensuring that Malaysia's palm oil industry meets global sustainability standards.

The MSPO certification process includes two key components, specifically, certification and traceability. It revolves around three core principles, i.e. accountability, sustainability and traceability. These principles address fundamental questions, where palm oil is produced, what it consists of, when it is processed and how it can be traced. The certification process includes two tracks, that is, Oil Palm Management Certification and Supply Chain Certification Standards (ISS & SSI 2019). Entities requiring certification include plantations and processing facilities, and each mill, plantation, refinery or processing plant is listed individually in the certification system (Figure 1.5). Certification is a prerequisite for tracking and tracing, and only certified palm oil and its derivatives are entitled to bear the MSPO label (Figure 1.6).

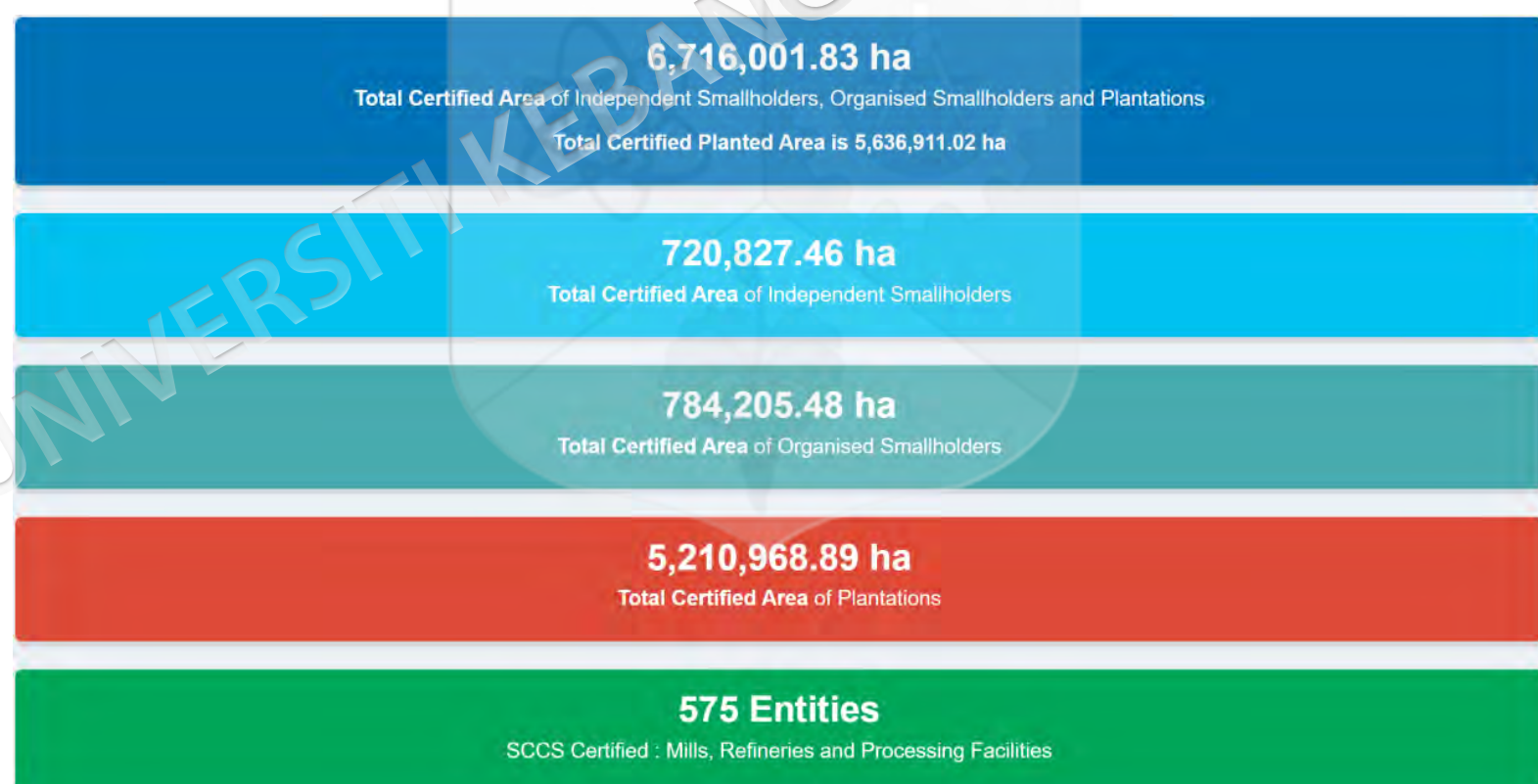


Figure 1.5 Certified planted area of MSPO

Source: MPOCC, 2021

	Supply Chain Model (based on scope of certification)	Content of MSPO Certified Material	Label Implies
	Mass Balance	70%	The product must contain a minimum of 70% of MSPO certified material originating from MSPO certified oil palm planted area where it will be verified through the supply chain certification. Source of non MSPO certified shall be from Malaysia.
	Segregation	100%	The product must contain 100% of MSPO certified material originating from MSPO certified oil palm planted area where it will be verified through the supply chain certification.

Figure 1.6 Specific requirements for MSPO-certified label

Source: MSPO, 2022

In 2021, the MPOCC revised its statistical approach, focusing on certified planted areas as the main figure for certification data, whereas previously, MSPO achievements were measured based on certified areas. To ensure Malaysian palm oil remains competitive and sustainable in global markets, the MPOB updated the MSPO 2013 certification to the new MSPO 2022 standard. The updated certification strengthens sustainability measures by addressing plantation worker placement, forced labour concerns and economic cycles. It adopts the concept of High Conservation Value (HCV) and incorporates methods for measuring Greenhouse Gas (GHG) emissions, particularly those related to land-use changes. Other essential elements in MSPO 2022 include enhanced requirements for the traceability and legality of fresh fruit bunches (FFB), as well as ethical business practices.

These revisions present new challenges for exporters and importers of MSPO-certified products, as the certification limits alterations to the material’s chemical properties during trade. This reflects the broader trend of incorporating sustainable management practices within the palm oil supply chain. From 2024 onwards, MSPO certificate holders will be re-audited under the enhanced MSPO 2022 criteria, which aim to address challenges, such as negative perceptions of palm oil in Western markets by raising certification standards (Abubakar et al. 2021). As of 2022, 97.33 per cent of palm oil plantations in Malaysia, including smallholders and plantations, have been

certified under MSPO, while 453 out of 464 licensed palm oil mills have received MSPO certification (Priya 2022).

1.1.3 Palm Oil in China

In 2018, Malaysia and China signed a five-year economic and trade cooperation plan (2018-2022) to enhance bilateral ties, with a specific focus on the palm oil industry under the Belt and Road Initiative (BRI). China is the second-largest importer of palm oil globally (Figure 1.7), where it is used extensively in both food and industrial applications. Between 2015 and 2020, China's palm oil imports grew by 53.55 per cent, from 4.68 million tonnes to 6.81 million tonnes (Khadir 2020). From 2018 to 2023, Malaysia's exports of virgin palm oil, other palm oils and their derivatives to China remained largely consistent across all years except 2019 (Figure 1.8). Taking exchange rates into account, the actual transaction value has in fact increased. This accounted for 41.5 per cent of China's total palm oil imports, making China becomes Malaysia's top overseas market, surpassing India (Daniel 2021). Given the scale of China's imports, palm oil has been likened to the considerable influence that China's market has on the palm oil industry globally (Yuyangjinqi 2021).

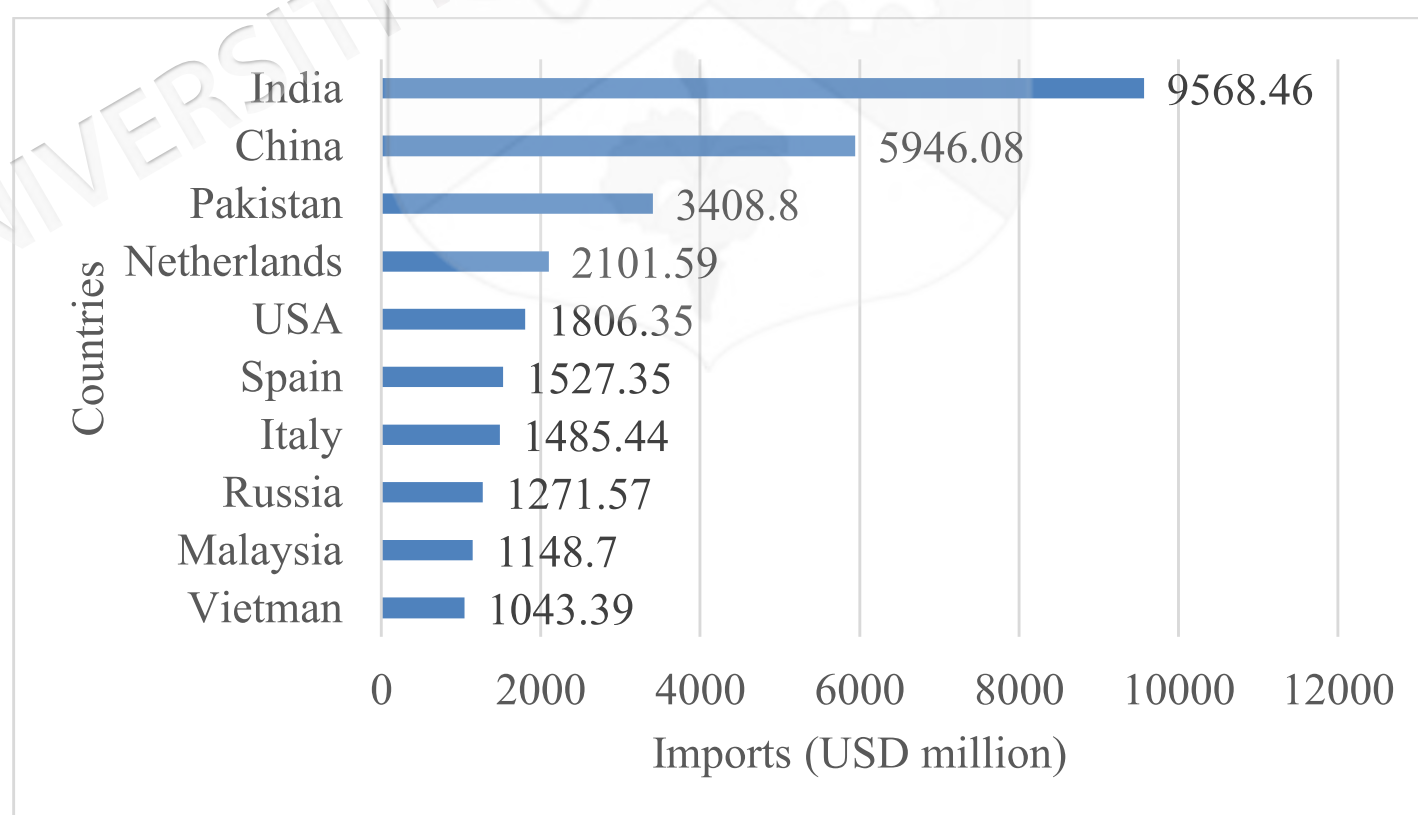


Figure 1.7 Leading importers of palm oil worldwide in 2021 (USD million)

Source: Statista, 2022

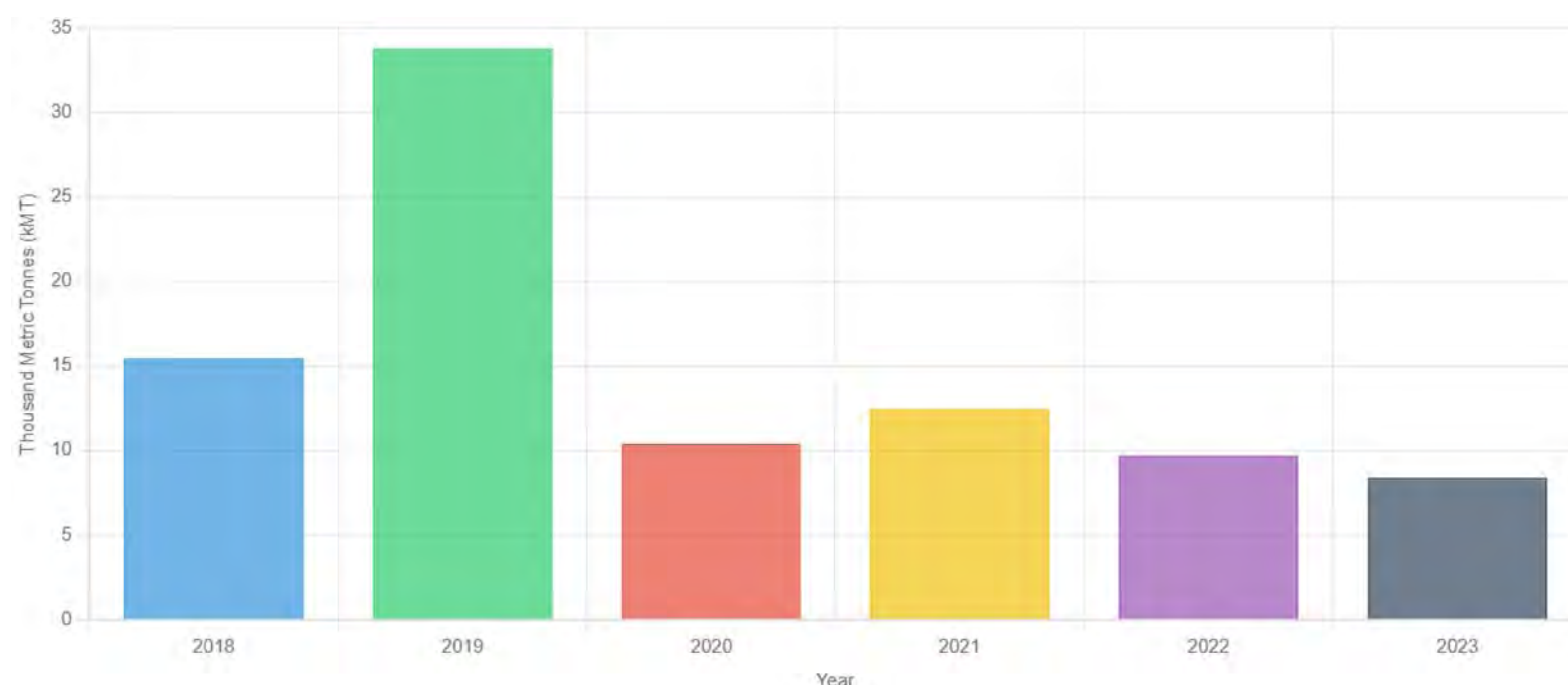


Figure 1.8 Malaysia palm oil export to China (Million Metric Tonnes)

Source: General Administration of Customs, 2024

China's vast market cannot be overlooked when exploring the environmental sustainability of commodities, and palm oil is no exception. Alongside palm (kernel) oil, other popular vegetable oils in China include soybean, rapeseed, peanut and sunflower oil (Figure 1.9), which are sourced both domestically and through imports (Figure 1.10). While these oils have varying ecological and social impacts (Ostfeld et al. 2019), palm oil remains at the centre of environmental controversy (Pacheco et al 2020). Since China produces little to no palm oil, imports are essential to meet its demand. With Malaysia at one end of the palm oil supply chain and China at the other end, focused on consumption, this research emphasises the Chinese side, examining the sustainability of palm oil from the middle and end stages of the supply chain.

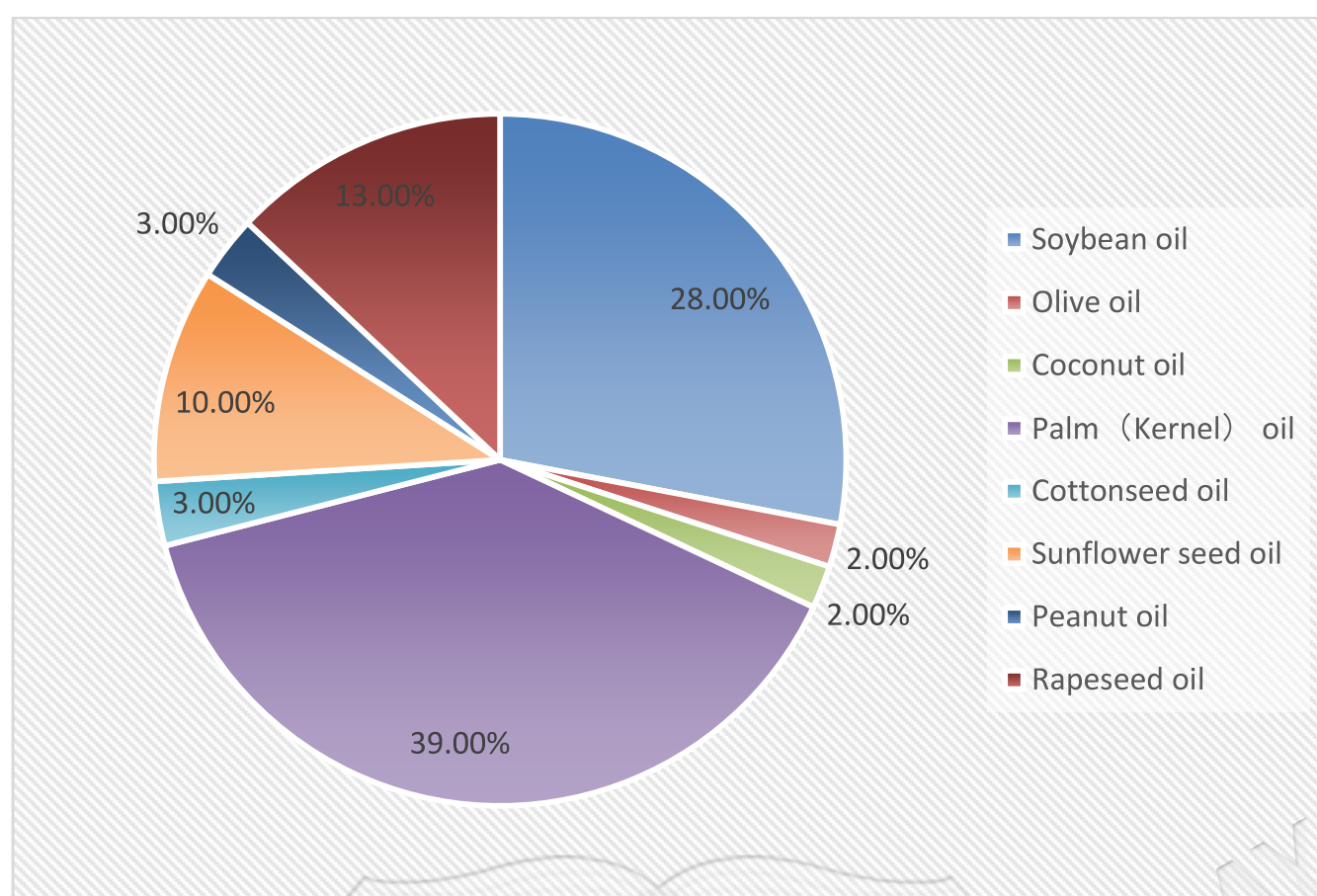


Figure 1.9 Statistics on the consumption structure of China's edible vegetable oil products, 2020

Source: Forward Industry Research Institute, 2022

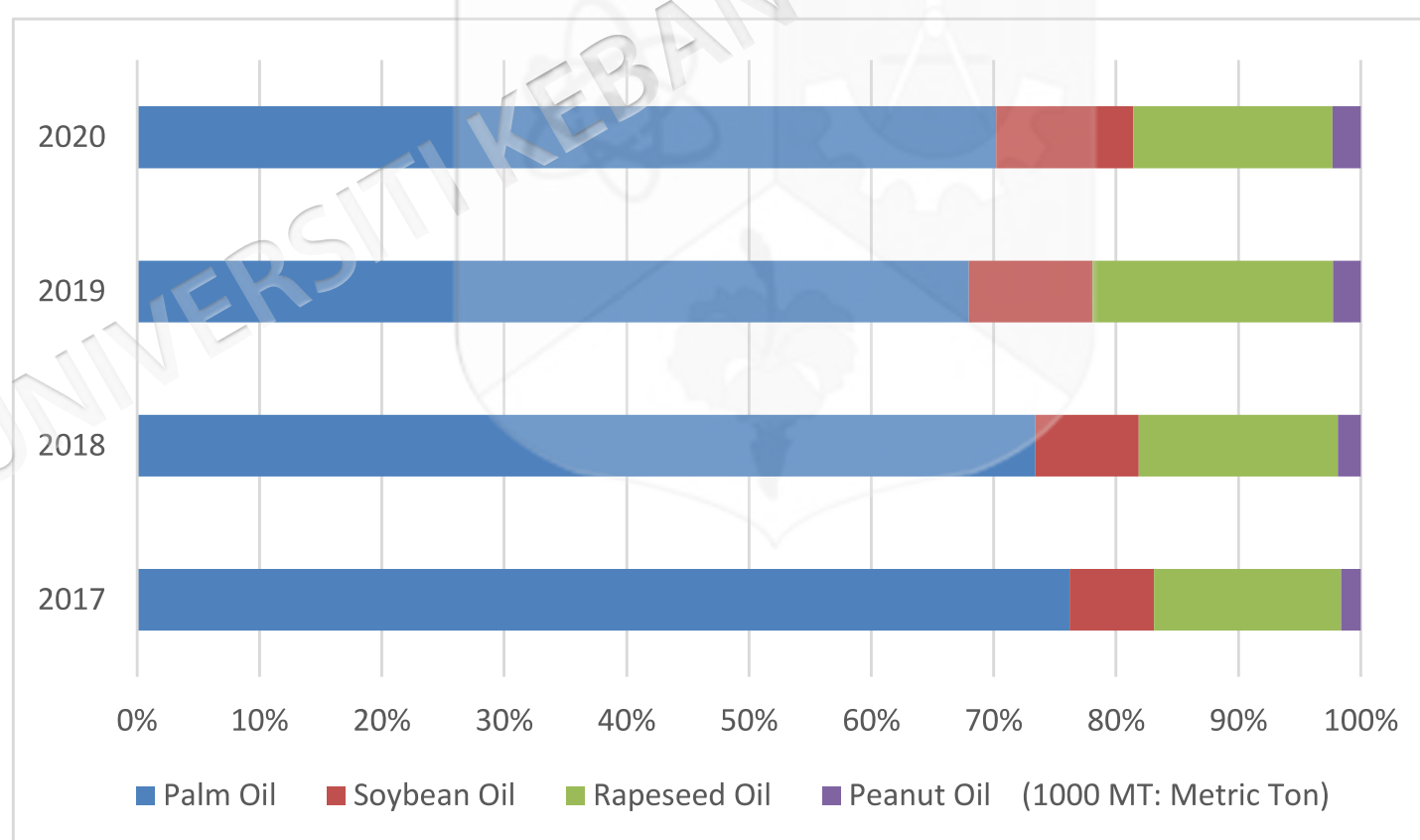


Figure 1.10 China vegetable oil import statistics

Source: United States Department of Agriculture, 2021

Although palm oil remains a significant component of China's edible oil consumption and import structure, its growth has markedly slowed. The stabilisation of palm oil consumption is essentially the result of a balance between 'rigid demand' and

‘price sensitivity’. Other oils, particularly soybean oil, remain the core of edible oils. Meanwhile, consumption of premium oils, rapeseed oil, sunflower oil and other specialty oils, is growing rapidly, becoming the primary drivers of market expansion.

In China, palm oil is prevalent in the food processing industry, where it is used in 71 per cent of food products, 24 per cent of consumer goods and 5 per cent of fuels (Mike 2019) (Figure 1.11). Consumers are generally unaware that these ingredients are derived from palm oil, which has been linked to deforestation, biodiversity loss, carbon emissions and social issues like land grabbing, forced labour and child labour (Ivancic & Koh 2016; Kushairi et al. 2017; Nambiappan et al. 2018). Palm oil in China is primarily consumed in instant noodle production, with two dominant companies, Uni-President and Ting Hsin International Group, leading the sector. In the oleochemical industry, palm oil is used in personal care products and detergents, with key players, including Estée Lauder, Procter & Gamble, Shiseido, Unilever, Colgate, Nice Group and L'Oréal.

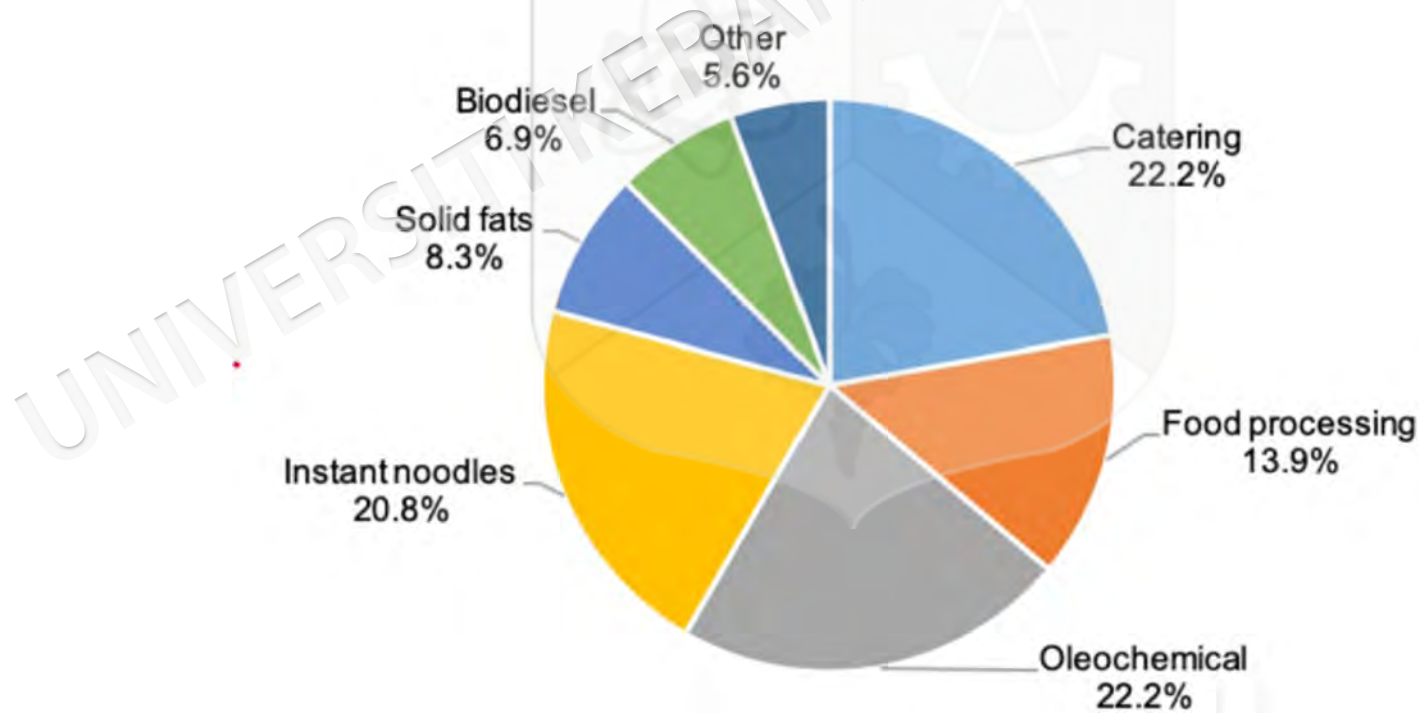


Figure 1.11 Palm oil applications by sectors in China, 2019

Source: Proforest & WWF, 2020

According to RSPO (2020), CSPO accounts for about 90 per cent of the EU market, but only 6 per cent of the Chinese market, falling short of RSPO's 10 per cent target. This suggests that Chinese producers remain largely indifferent to sustainable palm oil certification.

Chinese companies are still in the early stages of addressing forest-related issues. In 2020, the Carbon Disclosure Project (CDP) collected forest questionnaires from 30 Chinese suppliers, reflecting a 173 per cent increase in disclosures from the previous year. However, there is significant room for improvement in identifying forest-related risks and opportunities. Only 30 per cent of respondents had conducted a forest-related risk assessment, while 70 per cent failed to identify any forest-related risks (CDP 2020).

The Belt and Road Initiative (BRI), launched in 2013, provides an important context for understanding the palm oil trade between Malaysia and China. The BRI has become China's most significant diplomatic strategy (Aoyama 2016), with palm oil trade forming a part of its broader economic agenda. Although the palm oil trade represents only a small portion of the BRI's total economic volume, its environmental impact, through biodiversity loss, climate change and deforestation, is substantial. Tachizawa and Wong (2015) argued that examining supply chain sustainability governance through specific theoretical lenses can yield meaningful insights. This research aims to formulate a sustainability governance framework for the Malaysia-China palm oil supply chain within the context of the BRI, using Institutional Theory and Evolutionary Governance Theory to explore the interactions between actors, rules and organisations. The ultimate goal is to move from ambiguity towards a clearer governance path for sustainable palm oil.

1.2 PROBLEM STATEMENT

Palm oil is one of the most widely consumed crops globally due to its ability to produce high yields from limited land, coupled with its role in boosting the economies of emerging markets. However, the palm oil industry has been embroiled in a series of social and environmental challenges, including deforestation, biodiversity loss and human rights violations, which have undermined its sustainability (Ivancic & Koh 2016; Putri et al. 2022). As global demand for palm oil continues to rise, driven largely by major consumer goods companies, it has increasingly become a target for criticism from consumers and civil society (Tan et al. 2009). The environmental sustainability of Malaysia's palm oil industry has been particularly controversial, with Koh & Wilcove (2008) reporting that between 1990 and 2005, 55 per cent to 59 per cent of Malaysia's

oil palm expansion occurred at the expense of forest land, including primary, secondary and plantation forests.

In a report to the Directorate-General for Environment of the European Commission, Barthel et al. (2018) identified several challenges to achieving palm oil sustainability. These included limited engagement from major consuming nations like China and India, supply chain transparency and traceability, the high costs of implementing sustainability measures, the use of public and private procurement policies to increase demand for Certified Sustainable Palm Oil (CSPO) and the complexity of supply chains. The report also emphasised the need for a landscape-scale or jurisdictional approach to address deforestation and biodiversity loss. As the second-largest producer and exporter of palm oil, Malaysia plays a critical role in the global palm oil market, while China, the second-largest importer, is a key destination for Malaysian palm oil exports. The Malaysia-China palm oil relationship is thus integral to the global efforts towards sustainable palm oil management.

Palm oil often remains invisible to consumers, appearing in ingredient lists under names like sodium dodecyl sulfate, palmitoleic acid or simply vegetable oil. Despite China's significant role as a major palm oil importer, its adoption of sustainable palm oil practices lags behind other regions. The number of Chinese businesses involved in the Roundtable on Sustainable Palm Oil (RSPO) is not among the top five globally (Table 1.1). This phenomenon indicates that China, as one of the world's largest palm oil importers, has yet to effectively translate its market influence into leadership in driving sustainable development within the global supply chain. It reveals a disconnect within the palm oil supply chain, where producer nations, such as Malaysia, bear significant sustainability pressures, while major consumer markets like China fail to effectively convert these pressures into economic incentives.

Table 1.1 RSPO members by country and sector

Sectors	UK	USA	France	Germany	Malaysia	Indonesia	India	China
Banks/Investors	2		1			1		
Consumer Goods Manufacturers	74	139	49	98	6	4	7	15
Environmental/Conservation NGOs	5	14			5	4		
Oil Palm Growers	2				30	86		
Palm Oil Processors/Traders	35	68	16	46	58	25	28	39
Retailers	12	19	4	9				1
Social/Developmental NGOs	1				3	7		
Grand Total	131	240	70	153	102	127	35	55

Source: RSPO 2022

Kadarusman and Pramudya (2019) noted that Chinese stakeholders are generally less concerned with environmental sustainability when it comes to palm oil consumption, with price being a more significant factor in driving demand. Schouten & Glasbergen (2011) emphasised the need to better understand Chinese stakeholders' sustainability concerns and preferences, as this knowledge is crucial for promoting sustainable practices in the palm oil industry. These dynamics raise critical questions about the rules, roles and organisations that shape sustainability governance in the Malaysia-China palm oil supply chain.

The China-led Belt and Road Initiative (BRI) is gradually evolving from a focus on physical infrastructure (hard connectivity) to emphasising softer aspects like green development, health and digital advancements (CCICED 2020a). As the BRI approaches its tenth anniversary, it has contributed significantly to global development but has also faced criticisms related to excess capacity transfers, debt traps, increased carbon emissions and environmental degradation (Zhang 2018). The Green BRI offers an innovative development model aimed at enhancing resilience through high-quality co-construction (Zeng 2021). This 'high-quality' development is characterised by high standards, enhanced cooperation, efficient resource input and a focus on sustainability, ultimately benefiting people's livelihoods along the BRI routes (SC 2021).

The greening of the BRI represents a forward-looking approach that seeks to address critical ecological uncertainties, including environmental and biodiversity challenges (Yang, F & Yang, M 2019). This approach involves diverse stakeholders in the management of economic, social and environmental systems under the umbrella of a more sustainable BRI (Enfors et al. 2008; Plieninger et al. 2015). The VUCA (volatile, uncertain, complex and ambiguous) market conditions that arose during the COVID-19 pandemic have further accelerated the adoption of sustainability practices across supply chains worldwide (WEF 2020). The operation of complex cross-border supply chains (palm oil) and large-scale projects has become increasingly challenging, rendering sustainability not merely an ecological imperative but a strategic necessity for enhancing resilience and risk management. The fundamental concern remains that the BRI is not viable if it continues to employ conventional approaches, necessitating the tangible integration of sustainability strategies as constraints within its activities.

This research is positioned within the broader context of the Green Belt and Road Initiative, with a specific focus on the Malaysia-China palm oil supply chain. The Chinese side is particularly highlighted due to its limited experience with sustainable development and its lack of awareness regarding sustainable palm oil practices (Palmoilmagazine 2024). This has resulted in minimal incentive for Chinese enterprises, especially those downstream in the supply chain, to invest in sustainable palm oil (RSPO 2024). To address this issue, this study will employ Institutional Theory to formulate sustainability governance mechanisms for the Malaysia-China palm oil supply chain under the Green Belt and Road Initiative, with Evolutionary Governance Theory serving as the theoretical foundation for the sustainability governance framework.

1.3 RESEARCH QUESTIONS

This research is guided by the following three key questions:

- (i) What are the issues and challenges in implementing sustainable palm oil within the Malaysia-China supply chain?
- (ii) What are the rules, roles and organisations that address palm oil sustainability governance within the Malaysia-China supply chain?
- (iii) How can the sustainability governance framework be developed for the Malaysia-China palm oil supply chain in the context of the Green Belt and Road Initiative (BRI)?

1.4 RESEARCH OBJECTIVES

The research objectives, derived from the research questions, are as follows:

- (i) To identify the issues and challenges in implementing sustainable palm oil within the Malaysia-China supply chain by applying institutional and evolutionary governance theory.
- (ii) To analyse the rules, roles and organisations involved in palm oil sustainability governance within the Malaysia-China supply chain.

- (iii) To formulate a sustainability governance framework for the Malaysia-China palm oil supply chain under the Green BRI.

1.5 SIGNIFICANCE OF THE RESEARCH

This research seeks to formulate a novel sustainability governance framework for the Malaysia-China palm oil industries, incorporating both formal and informal governance modes. The framework formulated in this research aims to illustrate the structure and relationships of key actors within the palm oil supply chain, enhancing sustainable palm oil trade (economic), increasing market awareness of sustainable development (social) and promoting sustainable consumption and production of palm oil (environmental).

The focus on sustainability governance in supply chains is a critical area of research (Croom et al. 2000; Frank et al. 2019), but studies specific to sustainability governance in the palm oil supply chain, especially in the context of China, are still emerging. By exploring the sustainability governance of the Malaysia-China palm oil supply chain, this research will provide valuable insights for policymakers, government agencies and palm oil organisations to address the significant gap in empirical research on the sustainability governance of China's palm oil supply chain.

Specifically, this research will examine the Malaysia-China palm oil supply chain under the Green Belt and Road Initiative (BRI) using Institutional Theory and Evolutionary Governance Theory. The significance of this research lies in:

- (i) Enhancing the understanding of current issues and challenges in palm oil sustainability governance by employing the frameworks of Institutional Theory and Evolutionary Governance Theory.
- (ii) Analysing the elements that address these challenges using both theoretical lenses.
- (iii) Applying these theories to assess Chinese market conditions and the role of organisational sustainability within a rule-based governance framework.

Institutional theory resembles a static map delineating prevailing rules and structures; evolutionary governance theory, however, functions as a dynamic documentary illustrating how this map is drawn, amended or even redrawn. By synthesising both approaches, this research not only examines ‘where the problem lies’ (institutional perspective) but also comprehends ‘why the problem persists’ and ‘how change might occur’ (evolutionary governance perspective). Viewed through this dual lens, the challenges confronting the China-Malaysia palm oil supply chain cease to be an isolated list of problems. Instead, they emerge as pivotal nodes of dynamic force, either propelling or impeding the entire system's evolution towards sustainability. The study will critically investigate the interaction between private and public regulatory initiatives shaping the Malaysia-China palm oil supply chain, with a particular focus on China, the world's second-largest consumer of palm oil, where there is a growing context of environmental policy innovation.

Given that different countries approach supply chain management differently (Teuteberg & Wittstruck 2010), it is crucial to formulate a governance framework tailored to the palm oil sector in both Malaysia and China to promote sustainable consumption and production. The formulated framework will offer valuable insights into key factors, such as policy, stakeholders and industry (Lee et al. 2015), providing palm oil supply chain stakeholders with a deeper understanding of the elements affecting supply chain governance.

This research will contribute new knowledge to scholars, practitioners and regulators about the palm oil industry within the Malaysia-China supply chain, especially within the BRI context. While much attention has been given to the supplier (front end) in sustainability governance research (Lee et al. 2012; Tachizawa & Wong 2015), this study will explore the back end, i.e. sourcing, production and consumption, offering a fresh perspective and a new research horizon for scholars.

1.6 SCOPE OF THE RESEARCH

The palm oil trade between Malaysia and China, along with the state of their interconnected supply chain, is illuminated through an examination of the various stakeholders involved in palm oil sustainability governance. This research divides the

Malaysia-China palm oil supply chain into two main segments (Figure 1.12), highlighting the multifaceted interactions between stakeholders.

In the Chinese segment, the focus is on the intricate network of actors, which includes importers, manufacturers, processors, retailers and both governmental and non-governmental agencies. These actors are critical in shaping the sustainability practices and policies within the Chinese palm oil industry. The research emphasises their roles, decisions and collaborations in ensuring sustainability in the supply chain, particularly as China is one of the largest consumers of palm oil globally.

In the Malaysian segment, the research centres on the government's role in regulating and promoting sustainable palm oil practices. Governmental agencies play a vital part in setting policies and standards that guide the production of sustainable palm oil for export to countries like China. The Malaysian government's involvement in ensuring compliance with sustainability certifications, such as the RSPO and MSPO, is crucial in maintaining sustainability standards.

These dual segments allow for a comprehensive analysis of both ends of the supply chain, with a particular emphasis on the complex network of stakeholders in China and their engagement with palm oil sustainability. At the same time, it underscores the significance of the Malaysian government's regulatory role in shaping sustainable practices in the palm oil sector, especially within the framework of the Green Belt and Road Initiative (BRI). This division of focus ensures that the research captures the dynamics of sustainability governance across the entire Malaysia-China palm oil supply chain.

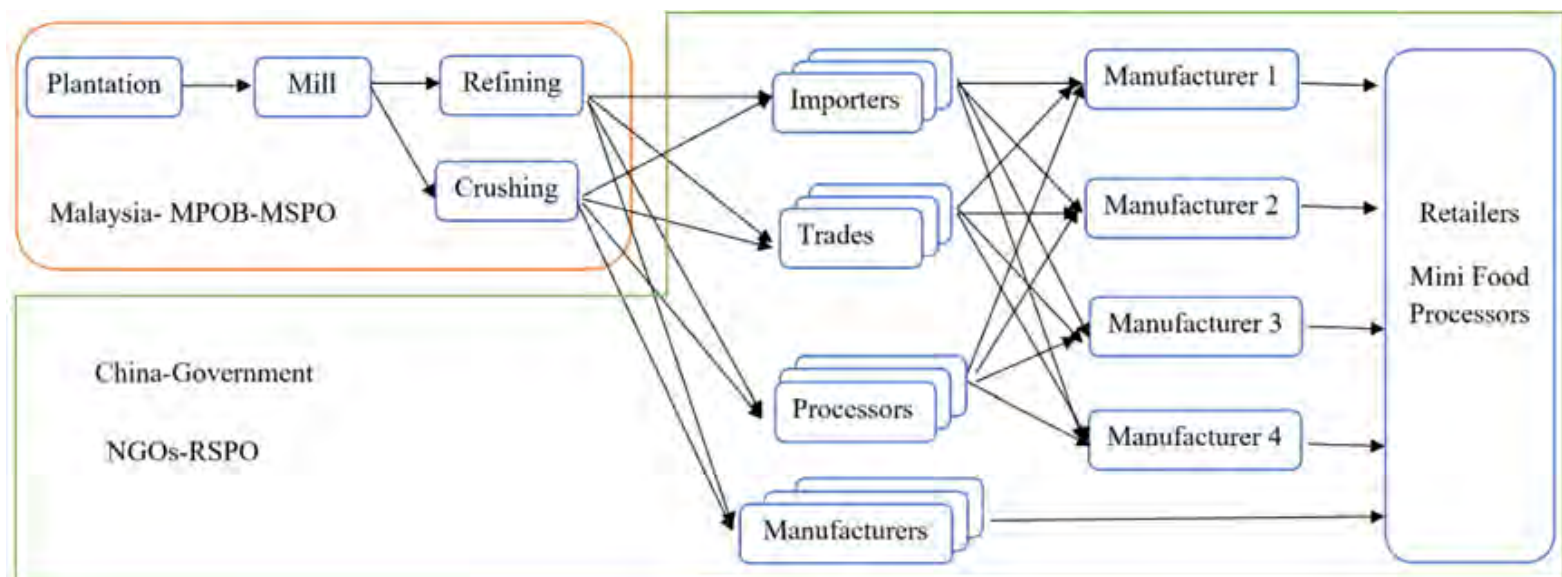


Figure 1.12 Scope of the study

1.7 THESIS OUTLINE

The structure of this thesis is organised as follows:

Chapter 1 introduces the background of the research, outlining the unsustainable activities identified in the palm oil trade between Malaysia and China's supply chain as the problem of this research. The research questions, objectives, scope and significance of the research are also presented.

Chapter 2 provides a comprehensive literature review, covering almost 10 years of studies in the areas of palm oil and sustainability. It includes classifications and solution approaches extracted from the literature that form the basis of this research, along with the theoretical framework.

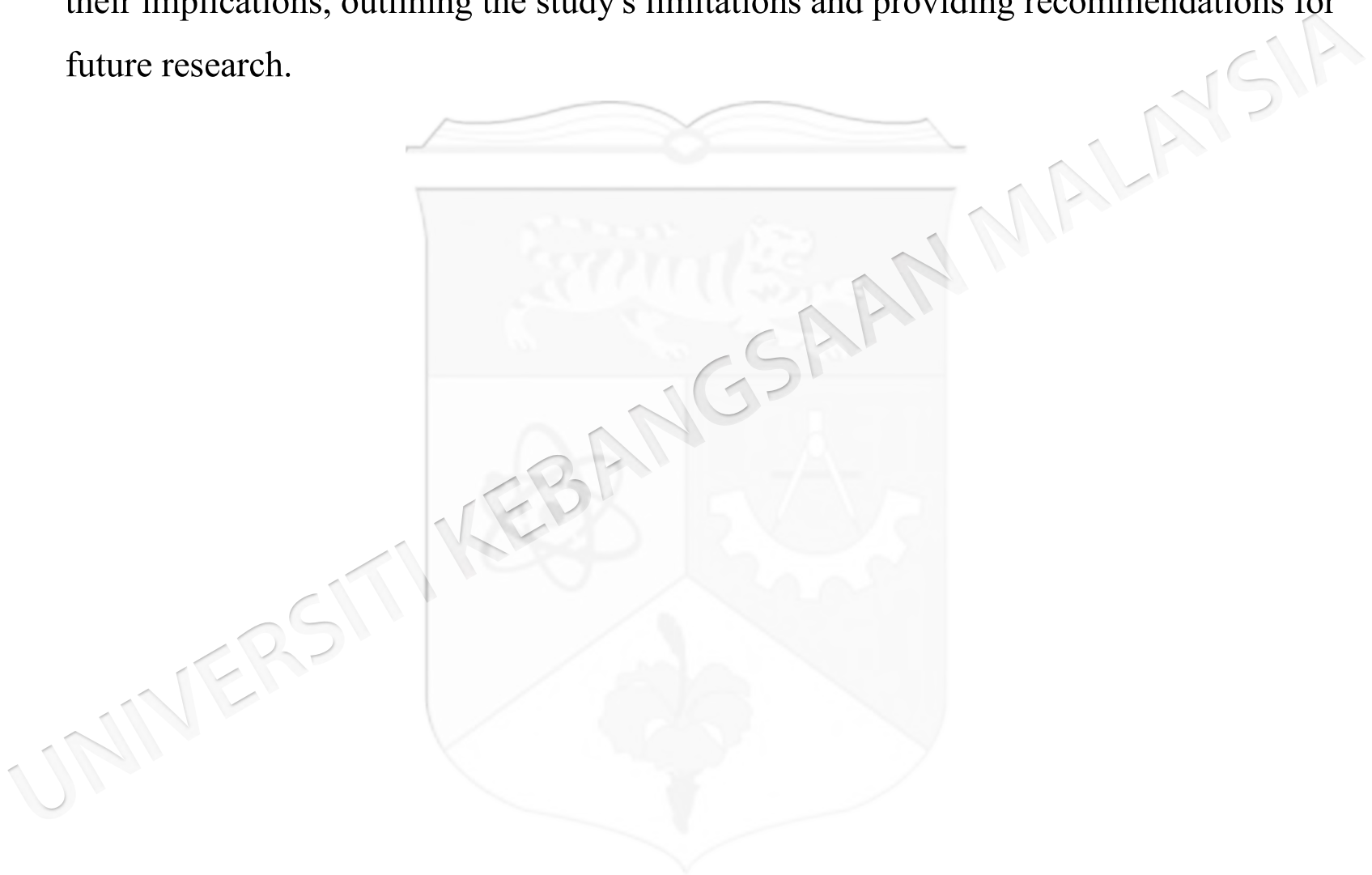
Chapter 3 explains the research methodology, detailing the research design which encompasses sampling procedures, data collection procedures, data analysis and interpretations.

Chapter 4 addresses Objective 1, which involves identifying the issues and challenges in implementing sustainable palm oil within the Malaysia-China supply chain, using qualitative data gathered through document content analysis.

Chapter 5 covers Objective 2, analysing the rules, roles and organisations involved in palm oil sustainability governance, employing both Institutional Theory and Evolutionary Governance Theory to interpret the findings.

Chapter 6 formulates the sustainability governance framework for the Malaysia-China palm oil supply chain under the Green BRI, as outlined in Objective 3, based on the findings drawn from the previous chapters and theoretical framework.

Chapter 7 concludes the thesis by summarising the research findings, discussing their implications, outlining the study's limitations and providing recommendations for future research.



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