

RSPO NOTIFICATION OF PROPOSED NEW PLANTING

This notification shall be on the RSPO website for 30 days as required by the RSPO procedures for new plantings (<http://www.rspo.org/?q=page/535>). It has also been posted on local on-site notice boards.

Date of notification : **16th December 2013**

Tick whichever is appropriate

This is a completely new development and stakeholders may submit comments.

This is part of an ongoing planting and is meant for notification only.

Company : Olam Palm Gabon
Subsidiary : -
RSPO Membership No. : 2-0209-11-000-00

Location of proposed new planting: (description or maps and GPS coordinate as below)

Company Name : **Olam Palm Gabon**

Company Address : **Head Office:** Olam International Limited 9 Temasek Boulevard #11-02 Suntec, Tower 2, Singapore 038989
Gabon Office: Olam Palm Gabon, Galerie Tsika (behind Mbolo), B.P.1024 Libreville, Gabon

Location Size : ± 31,800 Ha

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Location : **Olam Palm Gabon (Mouila Lot 2)**
Departments of Tsamba Magotsi (Fougamou) and Ndolou (Mandji). Ngounié Province, Gabon

GPS Reference : E 10°24' – 10°42' and S 1°26' - 1°44'

Legal permit : Concession agreement for long-term lease between the Government of Gabon (GoG), represented by the Prime Minister, and Olam Palm Gabon, issued by the Prime Minister, the Minister of Economy and Sustainable Development and the Minister of Agriculture, Livestock, Fishery and Rural Development, 5 June 2012. This agreement summarizes the rights and obligations of Olam Palm Gabon on the acquisition of a concession north of Mouila with a total area of 31,800 ha (period of 49 years, renewable once) to be developed for oil palm.

Location of proposed new planting

The area of proposed new planting is within a concession of 35,354 hectares in the province of Ngounié, in the departments of Tsamba Magotsi (Fougamou), and Douya-Enoye (Mouila). The concession, as stipulated in the land title deed, is on land of the private state domain, but customary use by villages in this area was identified through participatory mapping.

A preliminary soil survey, Environmental & Social impact assessment and High Conservation Value assessment of the concession were completed. The assessments have recognized the following:

- There was no primary forest identified within the concession area
- All areas required to maintain or enhance one of more High Conservation Values (HCV's)
- There are no areas of peat soils
- Land Identification of areas important to local communities was completed in two phases. The first phase, involved a socio-economic survey of each village potentially impacted by the project. In the second step, a team of experts completed participatory mapping in each village. This process identified both the areas currently used for hunting, fishing, logging and collection of non-timber forest products and sacred and culturally important sites

The maps below provide the location of the concession and the area of new plantings, as follows:



Figure 1. Location of Olam Palm Gabon (Mouila Lot 2) in Gabon

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Figure 2. Location of Olam Palm Gabon (Mouila Lot 2) in Ngounié Province, Gabon

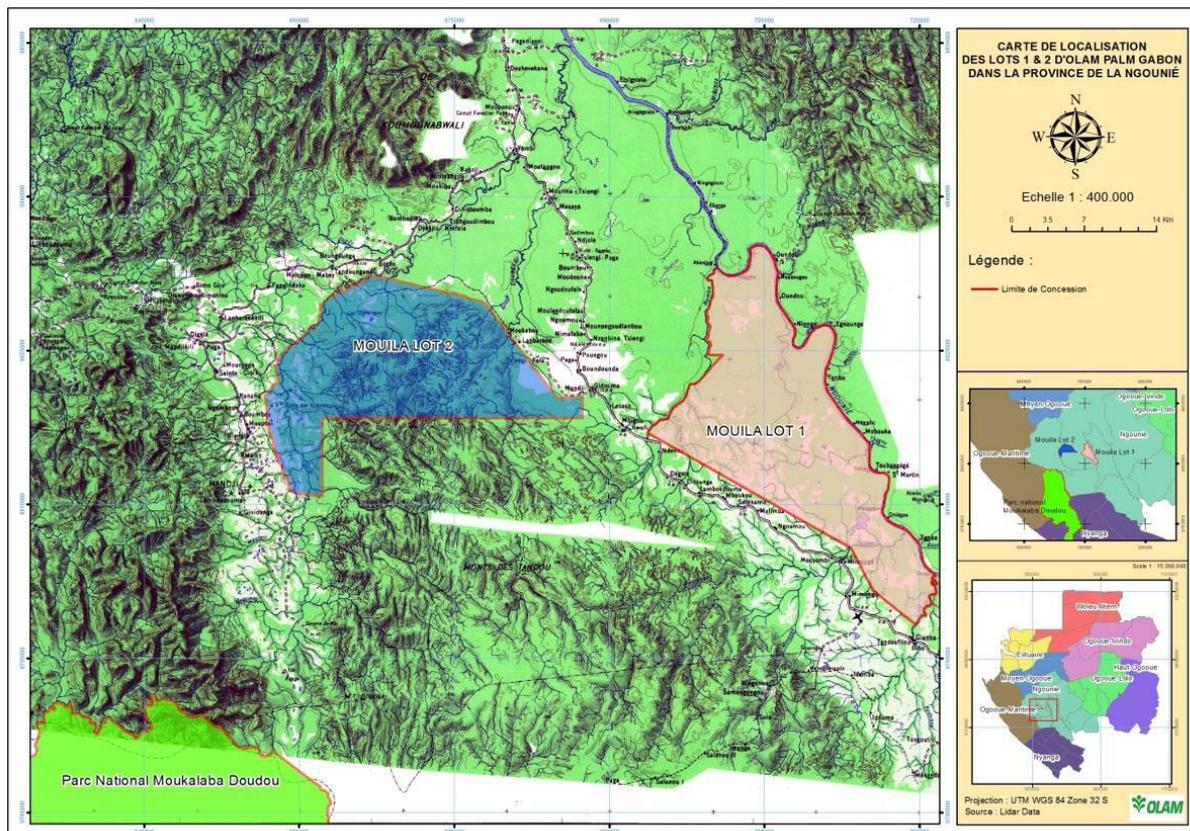


Figure 3. Map showing Olam Palm Gabon (Mouila Lot 2) and its surrounding entities

A. SUMMARY FROM SEI ASSESSMENTS:

The Social and Environmental Impact Assessment (SEIA) was conducted by Ecosphere in November 2012 – October 2013 for Olam Palm Gabon Project in Mouila (Lot 2) ± 31,800 ha located in Ngounié Province, Gabon. The report is comprehensive, covering the aspect-impact of environmental-social condition in the study location.

The SEIA was involved participation from various stakeholders, such as: local communities, governments and NGOs. Stakeholder meetings were conducted with the local community and others stakeholders, photographs and minutes of meetings are provided as evidence. The FPIC process is being implemented.

1. Summary of key findings in respect of socio-economic impacts to country, region and local communities

The site is located in Ndolou and Tsamba-Magotsi Departments, Ngounié Province. There are villages and small agglomerations of settlements along the two main roads that run along the northern sides of the concession.

Sources of Income

According to the socioeconomic study, monthly incomes range from less than 50,000 XAF per month to over 200,000 XAF per month. Sources of household income

include the sale of agricultural products, bush-meat, fish, NTFPs and palm wine. Additionally, some people manage small businesses.

Land Use and Conflict Management

The use of village land is, in principle, under the authority of the village chief. Indeed, for any newcomer to the village, the construction of a dwelling and use of agricultural land are subject to approval from the village chief. However, in practice, these requirements are often not followed.

Conflicts related to village life are often subjected to the village chief, and if no solution is found there, it can be passed to the district chief or to the highest level (the Prefet or the police). Most common conflicts between villagers are often resolved informally.

Infrastructure and Social Services

The road transport links are:

- Libreville – Fougamou road: Fougamou is 330 km from Libreville by car (5-6 hours' drive).
- Fougamou – Mouila road: Fougamou and Mouila are connected by a new road, paved by a Chinese company.
- Fougamou – Mandji road: There is a dirt road that connects Fougamou and Mandji along the Ovigui River.

Various goods (agriculture, fish, bush-meat, etc.) and handicrafts (basket, masks, pots, baskets, etc.) are for sale along the roadside. The roads also facilitate commercial activities between the villages. Though the Ovigui River is navigable and used as an important transport route, river traffic has largely stopped since the people settled along the road.

Houses are mostly constructed of wood (a structure built from wooden poles and planks) with brick earth walls, the exception being public buildings (schools and clinics) and some individual houses. The roofs are covered with sheet metal and sometimes straw or dried leaves and palm fronds.

Electricity from the public grid is available in Fougamou and Mandji, though power cuts are quite frequent and irregularly distributed in different parts of the towns. However, most villages in the region do not have access to public electricity and instead use generators which were provided as gifts during political campaigns. Fuel for the generators is either provided during political campaigns or through monthly contributions from villagers.

People in villages obtain water from public hydraulic pumps, rivers and rainwater. Existing hydraulic pumps were financed and installed by the Gabonese government. Some have been in a state of disrepair for several years due to various failures. Others, which are well maintained and repaired, work well.

The many rivers, streams and natural springs, are particularly used by villages which are not equipped with functioning hydraulic pumps. However it should be noted that the water quality of rivers may be below drinking quality standards. Rainwater is

collected in barrels, tubs and buckets and then used both for drinking, cooking and household chores. During the rainy season, this water source is regular but in the dry season, the rains are less abundant, and this water source is thus uncertain.

Education and Health Care

The study area has ten primary schools distributed across Mandji town and six villages. Most schools are public, but there is also a private Catholic school and a Christian Alliance school. All schools, especially in the villages, do not offer a complete cycle from year 1 to year 5 and some do not have a fifth year, which causes students to leave the village to complete the primary education cycle in Mandji. There are seven secondary schools in Mouila, one each in Mandji and in Fougamou each for a total of nine secondary schools unevenly distributed in the study area.

In general there is a bias toward boys, as girls may be excluded from education based on economic or cultural reasons. In the villages, the number of students in 4th and 5th year is lower than that found in the first, second and third years. Some may be absent due to the conditions in the village (no electricity, poor educational facilities, etc.) and others may be sent to the city to complete primary school. The socioeconomic study notes that several schools lack textbooks, tables and benches for students and desks and chairs for teachers.

In terms of medical care, Mouila has the largest and best health facilities. Douya Onoye is the only department to have a Regional Hospital and other structures such as the Centre de Traitement Ambulatoire (CTA), the Base Epidémiologique et de Lutte contre les Endémies et Ripostes (BELER) and a Provincial centre for maternal and child health.

In Tsamba Magotsi, the Fougamou Medical Centre is fairly well equipped and has a research center affiliated with the Albert Schweitzer hospital in Lambarene. Also, in Ngounié province, there is a regional health centre, private clinics and several pharmacies.

Subsistence Activities

Shifting agriculture is the primary activity in the villages with women carrying out planting, weeding and harvesting and men, land clearing . The staple food crops are cassava and banana. Farmers use their fields for a few years and then clear new land or return to old fallows. Most farms are located from 500m to a few kilometers from the villages and people often construct small huts in the fields so that they can protect against crop damage and raiding by elephants, apes and rodents – a serious threat to crop yields.

Typical meals consist of starches (cassava, banana, yam etc.), vegetables, cassava leaves, fish products and bushmeat (gazelle, porcupine, antelope, bush pig, etc.) and sometimes wild foods (caterpillars, snails, Odika, etc.). Rearing of domestic animals is only practiced at a small-scale with households raising a few chickens and goats, but most animals are left to graze and are un-penned. Domestic animal meat is rarely consumed by households, but rather meat (especially goats) are used as an insurance policy, for paying fines or dowries for example. The majority of households in the study area use firewood for cooking meals. Firewood collection is done in the

surrounding forest. Local people gather non-timber forest products (NTFPs) for food, construction, medicinal purposes and small-scale commerce. Gathering activities generally extend over large areas and are conducted at the same time as other activities such as fishing, hunting and agricultural work.

Hunting

Hunting is another important activity for households, practiced by men, and taking place throughout customary territories ranging from relatively near to the villages and extending into the forest. Hunters most commonly use snares, placing them along frequently used forest paths and checking them a couple of times per week. A few hunters use shotguns, but this method is more expensive (purchase of guns and ammunition). For hunting, communities travel the longest distances into the forest; however it is performed by a limited number of people. The most commonly hunted species are antelopes (duikers), porcupines, monkeys and red river hogs. Those who target large animals (often protected) species are even fewer in number.

Bushmeat is consumed for household protein or sold to passers-by along the road and other villagers to buy basic necessities (soap, oil, salt or oil). Hunting contributes up to 10,000 XAF per week per household. It is not documented in this study, but some meat may make its way towards Libreville or other cities. Bush-meat is consumed for household protein or sold to travelers along the road and other villagers to buy basic necessities (soap, oil, salt or oil).

Fishing

Fishing is mainly practiced in the dry season when agricultural activities are less intense and some agricultural camps can also serve as fishing camp. Both men and women fish, though they generally use different methods. Women's fishing is generally for household consumption and is practiced in small streams during the dry season. In contrast, men's fishing occurs throughout the year and the catch is most often sold for cash income. The most commonly fished species include yarra, silure, carp and catfish. The study also noted that crocodiles are captured. This is of concern because dwarf crocodiles *Osteolaemus tetraspis* are protected by national law. According to the socioeconomic study, the Gisir people do not eat fish. If this is indeed the case, this should be considered when trying to recommend alternative sources of protein if bush-meat populations decline after palm plantation development.

Artisanal Logging

Artisanal logging (generally with pit saws) is practiced by communities for both household use (construction of houses, canoes and bridges) and for commerce. Families with customary land rights believe that they have ownership over forest territories and therefore the right to log commercial tree species

Cultural Values (see Figure 5 for sacred sites as determined by participative mapping). During discussions and mapping activities, people discussed their village history, and specifically how earlier generations migrated to the area and created the current-day villages. This history is visible in the form of ancient villages, tombs and sacred sites. One particular site known as the Holy Cross of Echira (Sainte Croix

d'Echira) is considered to symbolize the birthplace of the Echira people, and the site is of critical importance for the population; they are strongly attached to it and do not wish to see it disappear. This site could be de-classified from the Olam permit or special measures are needed to ensure its absolute protection.

Old villages can be found several tens of kilometers from the main roads and sites of current-day villages. Some people still practice activities such as hunting or agriculture in these former villages.

2. Summary of Key Findings of Socio-economic Impact in Respect to Emergent Communities

Jobs will be created through development of the plantation and its infrastructure. Subcontractors are expected to also hire their workforce locally. The jobs being created will fall under two categories: temporary, which are those lasting for a limited amount of time (i.e. road construction) and permanent, more sustainable roles (harvesters, maintenance workers, social workers, administration, health and safety). The development is likely to generate a dynamic economy in the region.

A monitoring committee (a standing committee of company and community representatives) will be set up to advice and initiate developmental projects as well as oversee employment issues such as hiring of locals, working conditions and capacity building of workers

Issues Raised by Stakeholders and Assessors Comments

Public Consultations

Public consultations were held in 9 villages and Mandji town. As listed above the consultations involved local and national government authorities, politicians representing the area, village representatives and representatives from Ecosphere and Olam Palm Gabon. The villages of Mouladafoula and Guidouma did not participate due to the first concern expressed below. The other concerns expressed are summarized below:

- Due to the presence of Lot 1 in the east and the proposed concession of Lot 2, the villages perceive that they are hemmed in and thus anticipate the loss of land for agriculture and the loss of native customary rights. Therefore the two villages (Mouladafoula and Guidouma) objected to the proposed development of Lot 2.
- Almost all villages expressed their concern on the loss of customary rights and livelihoods, particularly with respect to land for village farming and wanted the company to respect these by the identification and setting aside of areas for village use and/or compensation through material means that contribute towards social development.
- Due to strong dependence on rivers and other water bodies for fishing, drinking water and bathing, many villages expressed concern of the use of phyto-sanitary (agrochemical) products by the company and consequent contamination of water bodies. They wanted the company to put clear safe-guards in place to prevent this.

- Due to presence of sacred sites such as cemeteries, ancient villages and the Holy Cross of Echira (Sainte Croix d'Echira) they wanted assurance from the company that these would be protected by the setting aside of adequate areas.
- Due to their dependence on wood for house construction etc. the villagers requested access to wood on the concession prior to land clearing by the company.
- Overall they urged the company to respect their customs and traditions while developing the project
- While they welcomed employment opportunities that development would generate they were concerned about the tenure and conditions of employment in the face of compromises they would make for the company and the migration of foreign workers that could erode their cultural traditions and impact their livelihoods
- They were concerned about the loss of habitats for elephants and the possible escalation of elephant damage of their crops.

The company and the government authorities responded that these concerns would be duly considered and appropriately acted upon. Indeed the environmental and social management plans and the recommendations of the HCV assessment provide several recommendations pertinent these concerns. The company is therefore compelled to follow these recommendations

3. Free, Prior and Informed Consent

The process to obtain FPIC among villages surrounding the concession is an on-going process which has commenced. From the 6 steps recommended for completing the FPIC process, each of which have several key components, the social team of Olam Palm Gabon have completed the following actions against each step:

- Step 1(SEIA): The SEIA has been submitted to the Director General of Environment, subsequent to public consultations informing all stakeholders about the impacts of the project and addressing any concerns raised. The SEIA also includes a study for the impact of the project on subsistence activities (farming, hunting, gathering, collection and fishing) in and around the concession area and the recommended action to mitigate this.
- Step 2: (Elaboration of the FPIC process with stakeholders): The details of the FPIC process have been elaborated with local communities and relevant provincial and national government agencies. An information campaign on impacts of the project is presently underway. A register of information requested, issues, claims and complaints has been opened in the offices of Olam, the Prefectures of Mouila and Fougamou and villages potentially affected by the project. Furthermore a list of all stakeholders is maintained and a record of communications, consultations and actions arising from these, is regularly updated.
- Step 3: (Identification of stakeholders, definition of participative modes of consultations, representation and negotiations): A steering committee to monitor and guide the FPIC process has been established.
- Step 4 (Identification of the persons affected by the project and estimation of compensation required): An agricultural inventory was carried out to identify owners of crops, farms and timber permits within the concession, allowing Olam Gabon to plan for compensation of owners in accordance to Gabonese law.

- The last two steps, 5 and 6, facilitate obtaining free, prior and informed consent from the villagers and other stakeholders formally, validated through a social contract and a ritual ceremony. Execution of all steps (actions) is supported by documentary evidence signed by the relevant stakeholders and Olam Palm Gabon.

B. SUMMARY FROM HCV ASSESSMENTS:

1. Data Sources and Quality

Coordination of assessments like this comes with certain risks and challenges which Proforest aims to minimize or eliminate. For instance, in cases where discipline specialists did not adhere to sampling plans, methods or technical advice, Proforest has sought to supplement the information as much as possible from relevant literature, expert consultation and experience. Additionally, Proforest has made use of the precautionary approach to HCV identification meaning that where the information is not adequate to justify the absence of an HCV, an HCV may be assumed to be potentially present until further evidence shows otherwise.

2. HCV Toolkits Employed

Global generic guidance is provided by the HCV Resource Network, but countries also develop national HCV interpretations to further adapt the approach to national and local concerns. In 2008, forestry stakeholders in Gabon developed a national HCV toolkit, which has been used in certification processes resulting in successful FSC certification for forestry companies in Gabon. This draft HCV national interpretation was produced before large-scale agricultural plantation development was taking place. The definitions proposed in the earlier draft now need to be reviewed in the context of significant habitat loss through plantation development (Rayden 2012). Since 2011, a consortium of conservation organisations has worked on updating and refining some of the guidance in the 2008 HCV national interpretation (Rayden 2012), but at the time of this HCV assessment, this guidance has not yet been fully developed. The reference documents used to interpret and identify HCVs during this assessment include: Good practice guidelines for High Conservation Value assessments (2008), the HCV National Interpretation for Gabon (2008) and recently published Common Guidance for HCV Identification (2013).

3. Stakeholder Consultation

In September 2013 Proforest conducted stakeholder consultation to discuss the HCV assessment results for the Mouila Lot 2 project. Summary of stakeholder concerns as below:

Process of Concession Acquisition

Both social and conservation NGO representatives expressed concern over the process of concession acquisition, namely the transfer of forest domain land to an agricultural use. According to Olam, the Ministry of Economy, Employment and Sustainable Development issued Olam Palm Gabon (OPG) with a Bail Emphytheotique in November 2012 for 31,800 ha for development of a new oil palm plantation in Mouila Lot 2. This is outside of the direct scope of the HCV assessment, but it is important

for RSPO and NPP compliance. Proforest has recommended that Olam effectively communicate the land acquisition process (and evidence of permits) to concerned stakeholders to ensure transparency.

A question of Process for Development

Most stakeholders acknowledge that the choice of this site (Mouila 2) is appropriate in terms of distance from protected areas, proximity to roads, etc. However, stakeholders want to see that the process for determining whether and how much forest conversion will take place, is systematic and objective and can be repeated consistently for all of Olam’s future developments. They would like to see a holistic and landscape (even national or provincial) view, rather than piece-meal developments.

Biodiversity

- WCS and WWF expressed concern that some of the methods used were not rigorous enough to adequately characterize the biodiversity of the site. They mentioned specifically the lack of surveys for savannah patches and herbaceous plants.
- Develop a conservation management plan for great apes (gorillas, chimpanzees) and elephants

Collaborate with Neighbors

Stakeholders recommended that Olam collaborate with neighbors such as CBG (FSC certified logging concession) and a mining company to share biodiversity and inventory data and to manage wildlife.

Local Communities

- Ensure that social impacts of immigration to the area (e.g. increased pressure on natural resources) are adequately addressed by management plans.
- Conduct a high quality FPIC process

4. Decisions on HCV status and Related Mapping

HCV	Definition	Present/Potentially Present/Absent	Approx. area (Ha)
HCV 1	Concentrations of biological diversity including endemic species, and rare, threatened or endangered species, that are significant at global, regional or national levels.	Potentially Present	Overlap with HCV 4
HCV 2	Large landscape-level ecosystems and ecosystem mosaics 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	Absent	-

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HCV 3	Rare, threatened, or endangered ecosystems, habitats or refugia	Absent	-
HCV 4	Basic ecosystem services in critical situations including protection of water catchments and control of erosion of vulnerable soils and slopes.	Present	17,522 ha
HCV 5	Sites and resources fundamental for satisfying the basic necessities of local communities or indigenous peoples (for example for livelihoods, health, nutrition, water). Identified through engagement with these communities or indigenous peoples.	Present	4,382 ha
HCV 6	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.	Present	Included in HCV 5 area above

C. SUMMARY OF PLANS

1. Summary of Management and Mitigation Plans for SEIA

Potential Impact	Action Plan	Adherence Indicator	Timing	PIC
Reduction or loss of areas for village plantations, hunting, fishing or collection and exploitation of timber & non-timber forest products Reduction or loss of areas for village plantations, hunting, fishing or collection and exploitation of timber & non-timber forest products	Inform communities about the value of the land and their rights prior to negotiating conservation and/or compensation for relinquishment of lands	<ul style="list-style-type: none"> Minutes of meetings with villages available 	Prior to land clearing	Social Manager
	Demarcate areas that will be maintained for continued village use (NTFP, agriculture) and include in GIS database	<ul style="list-style-type: none"> Social Participatory Maps available No social conflicts or intrusions onto land 	Prior to land clearing	Social Manager/GIS/ community representatives
	Establishment of village committee for negotiation and long term engagement and monitoring	<ul style="list-style-type: none"> Minutes of village committee meetings Reports on progress against social commitments are available Social Contracts signed by community representatives 	Prior to land clearing	Social Manager
	Provide access to timber cleared from the site for community use and funding from sale of timber for the benefit of community.	<ul style="list-style-type: none"> Records of contributions to community fund from sale of timber Records of tax paid to Government for timber Record of quantity of timber provided to communities 	First year of development	Social Manager
	Demarcate areas that will be maintained for continued village use (NTFP, agriculture) and include in GIS database	<ul style="list-style-type: none"> Social Participatory Maps available No social conflicts or intrusions onto land 	Prior to land clearing	Social Manager/GIS/ community representatives
Disruption of Sacred or Cultural Sites	Demarcate and conserve sacred areas with communities (FPIC)	<ul style="list-style-type: none"> GIS coordinates of sacred sites available Monitoring plan for sacred sites in place 	Prior to land clearing	Social Manager
	Inform employees and subcontractors on appropriate conduct with regards to respecting sites	<ul style="list-style-type: none"> Minutes of meetings and attendance available No intrusions on sacred sites 	Prior to land clearing	Training Manager/Social Manager
Social Conflict caused by potential	Consult with Community Representatives prior to hiring foreign labour for plantation	<ul style="list-style-type: none"> Minutes of meetings available Action plan to prevent social conflict based on 	Prior to hiring foreign labour	Social Manager

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influx of foreign workers	maintenance	recommendations from representatives in place		
	Provide adequate housing and sustenance within the Plantation for foreign workers to reduce intrusion into communities and impact on biodiversity	<ul style="list-style-type: none"> # houses established proportionate to foreign workers Sale of food on site for workers No hunting or theft of crops by foreign workers 	Prior to hiring foreign labour	Director at Site
	Inform foreign workers about local customs	<ul style="list-style-type: none"> Awareness Programme is implemented and attendance is recorded 	Immediately upon joining	Social Manager
Intensification of hunting and fishing	Ban hunting by foreign plantation workers and prohibit any worker from hunting within the concession during working hours	<ul style="list-style-type: none"> Records of species seized from hunters on site Interviews with workers demonstrate understanding of ban Signs citing ban are posted throughout the site 	Continuous	HCV Manager
	Partner with the National Parks Agency and Ministry of Water and Forest and national NGOs to monitor and enforce compliance with wildlife laws	<ul style="list-style-type: none"> Partnership agreement with National Parks Agency and/or Ministry of Water and Forests Presence of National Parks/Water and Forests field officers 	Continuous	HCV Manager
	Partner with local development agencies to establish a programme to ensure food security.	<ul style="list-style-type: none"> Partnership agreement with local development agency Plots for cultivation mapped with interested farmers Seedlings provided to farmers Records of revenue from sale of produce 	During first year	Social Manager
	Inform villages on sustainable hunting practices	<ul style="list-style-type: none"> Awareness Raising Programme implemented and attendance is recorded 	Continuous	HCV Manager
Job Creation	Hiring policy favorable to local communities	<ul style="list-style-type: none"> Documented policy in place Advertisement of jobs in local communities 	Continuous	HR Manager
	Multiplier effect from capital injection in local communities through payment of wages and hiring of local contractors	<ul style="list-style-type: none"> Documented baseline of household incomes in affected communities Social surveys completed on an annual basis to identify changes 	Prior to land clearing	Social Manager
	Provide healthcare to workers	<ul style="list-style-type: none"> Records of medical care provided All national workers are covered by health insurance 	Continuous	Doctor
	Establishment of dispensaries and consider	<ul style="list-style-type: none"> Plans for construction and management of 	Within 3 years of	Social Manager

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	providing access to basic medical consultations in local communities (subject to FPIC)	dispensaries agreed on with Communities • Dispensaries are established	starting development	
	Rehabilitation of schools and teachers housing (Subject to FPIC)	• Plans for rehabilitation and management of schools and teachers housing agreed on with local Government	Within 3 years of starting development	Social Manager
Erosion Prevention/loss of fertility	Demarcate and set aside areas with slopes above 20 degrees and hill forest area as permanent HCV areas	• Areas marked in GIS database and left undeveloped	Prior to land clearing	HCV Manager
	Windrow felled vegetation	• Stacked vegetation between planting rows	During land clearing	Director at Site
	Terrace slopes between 10-20 degrees, in areas suitable for planting, to prevent erosion and facilitate greater retention of moisture	• Terraced slopes	After land clearing	Director at Site
	Establish Pueraria javanica immediately after land clearing to ensure nitrogen fixation and prevent erosion	• Pueraria javanica is established and maintained in recently cleared areas	Immediately after land clearing	Director at Site
	Demarcate and maintain riparian buffers according to width of water course to prevent chemical runoff and sedimentation	• Riparian buffers are visibly marked • GIS coordinates of buffer boundaries are available	Prior to land clearing	HCV Manager
	Establish Road Construction plan	• Plan takes into account topography and hydrological systems	Prior to land clearing	Director at Site
		• Awareness programme on civil engineering best practices in place for machine operators	Prior to land clearing	Training Manager
	Compact roads and use laterite, where possible, to stabilize the surface to reduce erosion until suitable surfacing is established	• Roads are compacted and there is no significant erosion visible during rainy season	During land clearing	Director at Site
	Construct adequate drainage systems at regular intervals to drain and limit concentration of runoff (minimum of field drain to 8 rows); Pay particular attention to areas prone to flooding.	• Drainage system is in place and is well maintained and clear of blockages • Main drain outlets designed to minimise risk of sedimentation to minor rivers • No flooding	After land clearing	Director at Site
	Establish a system for managing storm water	• Storm water management system in place	After land clearing	Director at Site
Construct sediment traps at regular intervals	• Sediment traps are established and maintained	After land clearing	Director at Site	

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	where needed			
Air Pollution	Spray access roads with water regularly to reduce dust emissions	<ul style="list-style-type: none"> • Little dust covering vegetation along roads is visible 	Continuous	QEHS Manager
	Limit speed of vehicles and machinery to 40 km/h to reduce dust emissions	<ul style="list-style-type: none"> • Warning system for drivers breaking the speed limit is in place • No accidents resulting from speeding 	Continuous	QEHS Manager
	Prohibit idling of cars to reduce carbon monoxide emissions	<ul style="list-style-type: none"> • No idling cars 	Continuous	QEHS Manager
Maintenance of Water Bodies	Identify physiochemical parameters for water bodies and establish a water quality monitoring and management plan.	<ul style="list-style-type: none"> • Baseline assessment of parameters is provided • Water Management plan is in place • Water analysis reports are available 	Prior to land clearing	QEHS Manager
	Establish pollution prevention procedure which includes steps for clean-up in case of accidental spills or leaks	<ul style="list-style-type: none"> • Pollution Prevention Procedure is available • Monitoring records and corrective actions taken where spills have occurred are documented 	Prior to land clearing	QEHS Manager
	A piezometer will be used for monitoring of the water table level	<ul style="list-style-type: none"> • Record of water table levels 	Continuous	HCV Manager
	Demarcate and maintain riparian buffer zones around bodies of water and along rivers according to width.	<ul style="list-style-type: none"> • Demarcation of buffer zones • Rehabilitation procedure for accidental encroachments in place • Riparian Area monitoring records are available 	Prior to land clearing	HCV Manager
	Train contractors in proper felling techniques and bridge construction to ensure damage to riparian areas are avoided.	<ul style="list-style-type: none"> • Training programme in place and attendance is recorded • No non-conformities arise 	Prior to land clearing	Training Manager
	Avoid long-term diversion of water from its natural course	<ul style="list-style-type: none"> • Corrective actions are taken where water courses have been diverted 	During land clearing	HCV Manager
	Maintain vegetation around ponds to prevent eutrophication	<ul style="list-style-type: none"> • Monitoring records of water quality of ponds • Boundary of vegetation around ponds is marked 	Continuous	HCV Manager
	Process household waste water before discharging and monitor discharge areas	<ul style="list-style-type: none"> • Records of water quality tests of discharge water 	Continuous	QEHS Manager
	Treat sewage from base camp prior to discharge	<ul style="list-style-type: none"> • Sewage treatment plan is established • Records of tests of discharge water 	Prior to construction of housing	QEHS Manager

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	Construct concrete bunds around refueling and chemical storage/handling areas	<ul style="list-style-type: none"> Bunded areas are maintained 	During infrastructure construction	Director at Site
Household waste management	Establish waste management and monitoring plan for household waste which takes into account the collection, sorting and storage of recyclables.	<ul style="list-style-type: none"> Documented Household Waste Management plan is available 	Prior to development of housing	QEHS Manager
	Provide closed trash receptacles in housing area	<ul style="list-style-type: none"> Closed trash receptacles are available No litter around housing area 	During house construction	QEHS Manager
	Establish a leak proof, covered landfill of 25x15x 2 m in accordance to waste storage standards (Decree No. 541/PR/MEFEPEPN regulating waste disposal)	<ul style="list-style-type: none"> Landfill is established and complies with national regulations No leaks from landfill detected 	During infrastructure construction	QEHS Manager
	Inform workers and subcontractors about appropriate waste disposal	<ul style="list-style-type: none"> Interviews with subcontractors and workers reveal understanding of proper waste disposal No sightings of litter 	Prior to land clearing/continuous	QEHS Manager
Vegetative Waste	Windrow felled vegetation to ensure nutrients are returned to the soil	<ul style="list-style-type: none"> Vegetation is windrowed as stipulated in Agriculture Policy Manual 	During land clearing	Director at Site/Regional
Ordinary Industrial Waste	Establish a waste management and monitoring plan for collection, sorting and storage of ordinary industrial waste recyclables; workers will be informed of proper handling and disposal of waste in the appropriate receptacle	<ul style="list-style-type: none"> Documented Industrial Waste Management Plan is available Monitoring records are available Corrective Actions, where taken, are recorded 	Prior to land clearing	QEHS Manager
	Inform workers and subcontractors about appropriate waste disposal	<ul style="list-style-type: none"> Minutes of meetings with workers and subcontractors available Interviews with workers and subcontractors reveal understanding of disposal procedure 	Continuous	QEHS Manager
	Define procedures for control and clean up of any spills or leaks	<ul style="list-style-type: none"> Control and clean Up Procedures are documented Corrective actions taken as per procedures are recorded 	Prior to land clearing	QEHS Manager
Hazardous Industrial Waste	A waste management plan for the collection, treatment, storage and disposal of hazardous	<ul style="list-style-type: none"> Documented monitoring plan and schedule for waste disposal are available 	Prior to land clearing	QEHS Manager

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	industrial waste will be established according to best practices	<ul style="list-style-type: none"> Waste manifests are available 		
	Define procedures for control and clean up of any spills or leaks	<ul style="list-style-type: none"> Control and clean Up Procedures are documented Corrective actions taken as per procedures are recorded 	Prior to land clearing	QEHS Manager
	Inform workers and subcontractors about appropriate waste disposal	<ul style="list-style-type: none"> Minutes of meetings with workers and subcontractors available Interviews with workers and subcontractors reveal understanding of disposal procedure 	Prior to land clearing	QEHS Manager
Reduction of GHG emissions	Control and monitor consumption of oil for machinery, vehicles and use of generators	<ul style="list-style-type: none"> Monitoring records are available 	Continuous	Workshop Manager
	Carry out regular maintenance of vehicles and machinery	<ul style="list-style-type: none"> Documented maintenance history is available 	Continuous	Workshop Manager
	Limit land clearing to planned areas, and maintain and monitor buffer zones & other conservation forest areas	<ul style="list-style-type: none"> Map of protected areas and planting areas are available and specific instructions for clearing are documented and available 	Prior to land clearing	HCV Manager
	Where ever possible, low-polluting modes of transport will be used and fuel consumption will be controlled	<ul style="list-style-type: none"> Fuel consumption record is available 	Continuous	Workshop Manager
	Establish emissions reduction plan based on LUC and operations emissions baseline calculated using the Palm GHG calculator.	<ul style="list-style-type: none"> Documented plan is available 	Prior to Land Clearing	HCV Manager
Reducing Noise and vibration	equipment in good working condition according to manufacturers maintenance schedule	<ul style="list-style-type: none"> Documented maintenance history is available 	Continuous	Workshop Manager
	Equip machinery operators with mufflers for protection against loud noise	<ul style="list-style-type: none"> PPE Issuance Register Proper use of PPE in field by workers 	Prior to land clearing	QEHS Manager
	Train machinery operators in appropriate operating practices and raise awareness on physical stress related to operation of machinery	<ul style="list-style-type: none"> Minutes of meetings with operators and attendance sheet are available Operators are not affected by any physical stress from operation 	Prior to land clearing	QEHS
	Limit construction to daylight hours during the week to reduce noise to prevent excess	<ul style="list-style-type: none"> No activity outside of working hours 	Continuous	Director at Site

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	disturbance of inhabitants of conservation areas and local communities			
Loss and disturbance of biodiversity	Implement land clearing plan which strictly limits development to areas identified for planting and infrastructure.	<ul style="list-style-type: none"> Land clearing plan is available Development does not infringe on set aside areas. 	Prior to land clearing	General Manager
	Demarcate HCV areas in the field and record in GIS database	<ul style="list-style-type: none"> HCV areas are demarcated in the field and GIS coordinates are recorded in database 	Prior to land clearing	GIS Expert/HCV Manager
	Monitor and maintain HCV areas, riparian buffer zones, and significant slope areas	<ul style="list-style-type: none"> Monitoring Reports are available Faunal Surveys are available 	Continuous	HCV Manager
	Discuss wildlife inventories with local wildlife experts and develop a wildlife management plan which is aligned with CBG's management plan	<ul style="list-style-type: none"> Minutes of meetings with experts Recommendations are taken into account in a documented management plan 	Within first year of development	HCV Manager
	Partner with the National Parks, the Department of Water and Forests and NGOs to manage HCV areas and enforce wildlife laws	<ul style="list-style-type: none"> Documented partnership agreement 	Prior to land clearing	HCV Manager
	Prohibit hunting by foreign Olam workers at all times and by any worker during operating hours	<ul style="list-style-type: none"> Records of hunted species seized on site 	Continuous	HCV Manager
	Establish security posts along access roads and implement regular security controls	<ul style="list-style-type: none"> Records of species seized Patrol record 	Continuous	Security Manager
	Provide alternative sources of protein for foreign workers and partner with development organizations to develop animal husbandry programme in villages	<ul style="list-style-type: none"> Partnership agreement with local development organization Roadmap for programme implementation Surveys of current protein consumption in villages completed 	Within first year of development	Social Manager
	Limit operations to daylight hours allowing faunal species to move across the site at night	<ul style="list-style-type: none"> No activities outside of working hours 	Continuous	Director at Site
Health and Safety	Implement QEHS Policy and Procedures	<ul style="list-style-type: none"> Documented QEHS plan available Procedures are posted where relevant Respect for work code of conduct in field 	Continuous	QEHS Manager

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	Monitor and review effectiveness of QEHS Policy and Procedures	<ul style="list-style-type: none"> Minutes of QEHS Policy and Procedure Review meetings and corrective actions taken based on recommendations 	Continuous	QEHS Manager
	Equip and train workers on the use of appropriate Personal Protection Equipment	<ul style="list-style-type: none"> Minutes of meetings with workers Use of PPE in the field 	Continuous	QEHS Manager
	Train workers in first aid/emergency response	<ul style="list-style-type: none"> Minutes of meetings with workers Interviews with field staff reveal understanding of response procedure 	Prior to land clearing	QEHS Manager
	Provide first aid kits at regular intervals throughout the plantation and in all vehicles.	<ul style="list-style-type: none"> First Aid kits are available and contents inside are within expiry dates 	Prior to land clearing	QEHS Manager
Storage, handling and application of Phytosanitary products	Report on and maintain records of LTA	<ul style="list-style-type: none"> LTA records are available 	Continuous	Doctor
	Train workers on responsible handling and application of phytosanitary products	<ul style="list-style-type: none"> Medical reports for any cases of mishandling of chemicals Records of training and attendance 	Continuous	QEHS Manager
	Prohibit pregnant or nursing women from applying phytosanitary agents and reassign them to maintenance of buildings and/or the crèche	<ul style="list-style-type: none"> Procedure in place for relocating affected women Medical certificates are available 	Continuous	QEHS Manager
	Conduct regular blood screening of workers responsible for application of phytosanitary agents	<ul style="list-style-type: none"> Records of screening available Procedure for taking corrective actions for any irregular screenings is available 	Continuous	QEHS Manager
	Inform workers about sicknesses related to the application of and exposure to phytosanitary products	<ul style="list-style-type: none"> Records of training and attendance 	Continuous	QEHS Manager
	Construct an eye wash/shower in the case of direct contact with chemicals	<ul style="list-style-type: none"> Washing stations accessible in storage areas 	When chemical store is established	QEHS Manager
	Label all products with relevant MSDS and post safe-use signage	<ul style="list-style-type: none"> Relevant labeling is clearly displayed All MSDS are posted 	Continuous	QEHS Manager
	Arrange products according to their application (ie. pesticide, herbicide, fungicide, miticide) in chemical store	<ul style="list-style-type: none"> Products are in specified places 	Continuous	QEHS Manager
	Construct an isolated, ventilated room for storage of phytosanitary products and restrict access to appointed personnel	<ul style="list-style-type: none"> Clearly signed, locked storage area No noxious smells 	During infrastructure development	QEHS Manager

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	Adhere to the national system for the authorization of pesticides in order to limit the damage inflicted by pesticides on non-target species	<ul style="list-style-type: none"> Absence of contamination 	Continuous	QEHS Manager
	Justify and record fertilizer and pesticide inputs.	<ul style="list-style-type: none"> Records of fertilizer use are available Leaf sample analysis and pest census records are available 	Continuous	Agronomist/ Director at Site
	Apply empty fresh fruit bunches as mulch on the plantation	<ul style="list-style-type: none"> Evidence of use of empty FFB 	Continuous	Director at Site
Exposure to venomous/disease transmitting species	Reduce and prevent illness from insects by determining illness rates, intensity of contact risk with humans and monitoring populations of insects on the plantation	<ul style="list-style-type: none"> Baseline census of illness rates Insect survey are available Monitoring records are available 	Continuous	HCV & Doctor
	Anti-venom will be kept in the infirmary in the case of a snake-bite incident	<ul style="list-style-type: none"> Stock of anti-venom within expiry date 	Continuous	Doctor
	Workers who have been identified as suitable peer educators will be trained to identify venomous snakes in the area and how to care for snake bite victims	<ul style="list-style-type: none"> Record of training sessions 	Continuous	QEHS Manager

2. Summary of Management and Mitigation Plans for HCV

Potential Impact	HCV	Action required	Indicators	Timeline	Role Responsible
Loss of habitat	1	Demarcate identified HCV areas and incorporate in GIS database	<ul style="list-style-type: none"> HCV boundary markings are visible GIS coordinates are available 	Prior to Land Clearing	HCV Manager
		Implement monitoring and management plan to ensure effective maintenance of HCV areas	<ul style="list-style-type: none"> Monitoring and Management Plan is available Monitoring records available Corrective Actions recorded System for review in place 	Prior to Land Clearing	HCV Manager
		Monitor species densities in HCV areas	<ul style="list-style-type: none"> Faunal Survey report is available 	Continuous	HCV Manager
		Prohibit hunting in concession	<ul style="list-style-type: none"> Records of security screening at Access Points # of species seized from hunters 	Continuous	HCV Manager
		Establish system for monitoring and measuring operational compliance with SOPs regarding protected areas during land clearance.	<ul style="list-style-type: none"> Planning based on block-by-block basis and reviewed as clearing proceeds Monitoring records Corrective actions Documented recommendations from Sustainability team 	Prior to land clearing	HCV Manager
Degradation of hydrological systems	4	Apply controlled dosage of pesticides, herbicides and fertilizers to prevent excessive environmental loads	<ul style="list-style-type: none"> Records of phytosanitary chemical application (location and amount) Records of leaf sampling and pest census and Agronomist recommendation 	Continuous	General Manger/Agronomist
		Train workers on safe handling and cleaning of spraying equipment and controlled disposal of waste water and safe storage	<ul style="list-style-type: none"> Train contractors in relevant SOPs 	Continuous	QEHS Manager
		No spraying of agrochemicals in buffer zones	<ul style="list-style-type: none"> No evidence of chemical application Buffer zone monitoring records are available 	Continuous	HCV Manage

		Delineate riparian buffer areas, calculated based on the distance between either opposite banks of a river or the maximum extent of flooded areas as shown in the table below, in GIS database and with non-toxic paint or tape.		<ul style="list-style-type: none"> • Demarcate areas in a GIS database • Maps of riparian areas are provided to contractors and operations teams 	Prior to land clearing	HCV Manager	
		Water body	Width of water course (m)				Width of buffer zone on each side (m)
		Lake					To be determined in consultation with local people as most lakes have cultural values (HCV 6)
		Seasonal stream	< 5				15 – 20
		Tributaries	5 - 20				50
Large rivers	>20	100					
		Implement a water quality management plan which includes monitoring, and corrective/preventive actions	<ul style="list-style-type: none"> • Documented Water Management Plan • Water Quality Analysis results available • Water Quality Parameter Baseline (analysed prior to land clearing) is available 	Continuous	HCV Manager		
		Train subcontractors on the appropriate land clearing methods (felling trees so that they do not fall in protected areas) respecting buffer zones and HCV areas.	<ul style="list-style-type: none"> • Evidence of training and understanding of buffer zones management • No impact on buffer zones 	Prior to land clearing	HCV Manager		
		Plan bridges and river crossings prior to conversion according to best practices recognized by the FAO	<ul style="list-style-type: none"> • Construction plan is available • No erosion around bridges 	Prior to land clearing	Director at Site		
		Plan roads prior to commencing development	<ul style="list-style-type: none"> • Roads to be constructed are 	Prior to land	Director at site		

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		based on topography and soil structure, using appropriate erosion control methods such as compacting and laying laterite.	<ul style="list-style-type: none"> demarcated beforehand and recorded in GIS database SOP for road construction is available 	clearing	
		Construct drains with sediment ponds and road soak ways with sedimentation traps according to FAO best practices to avoid discharge of sediment into river systems	<ul style="list-style-type: none"> Drains, ponds and soak ways are in place Maintenance plan is available 	After clearing	Director at Site
		Grade and terrace cleared areas (where applicable) and establish Pueraria Javanica to prevent erosion	<ul style="list-style-type: none"> Date of cover crop planting SOP for terracing is available 	After clearing	Director at Site
Loss of customary use rights and threats to natural resources (sources of food and revenue)	5, 6	Prohibit fishing by foreign workers	<ul style="list-style-type: none"> Records of any infractions by foreign workers 	Continuous	HCV Manager
		Raise awareness among communities about sustainable fishing methods	<ul style="list-style-type: none"> Minutes of meetings with local communities 	Continuous	Social Manager
		Partner with a local development organization to establish a food security programme (agriculture and/or animal husbandry)	<ul style="list-style-type: none"> Partnership agreement is available Roadmap for programme implementation Surveys of current protein consumption in villages completed 	Within first year of development	Social Manager
		Inform communities about project impacts and value of the land, and seek their consent for development through a transparent and documented process (FPIC process)	<ul style="list-style-type: none"> Minutes of meetings with communities Documented consent Information on impacts is available to communities 	Prior to land clearing	Social Manager
		If communities choose to exclude areas from development, delineate areas and record in GIS database	<ul style="list-style-type: none"> Minutes of meetings with communities Maps of areas to be excluded from development for continued community use are available 	Prior to land clearing	Social Manager
		For areas identified as HCV, agree access rights and restrictions.	<ul style="list-style-type: none"> Minutes of meetings with communities Documented consent where areas are to be demarcated as HCV 	Prior to land clearing	Social & HCV Managers
		Agree on social contracts with measurable benchmarks with communities outlining	<ul style="list-style-type: none"> Minutes of meetings with communities Signed social contracts 	Prior to land clearing	Social Managers

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	development commitments and a plan for monitoring progress on a regular basis	<ul style="list-style-type: none"> with detailed benchmarks Agreed monitoring plan is available 		
	Plan workers housing in an area on site which reduces risk of hunting and fishing and conduct an immigration and population growth study to guide decisions on managing medium to long term social issues (e.g. health, worker housing, services)	<ul style="list-style-type: none"> Housing construction plan is available Records of internal assessment of alternative housing sites and impacts Documented immigration and population growth study available 	Prior to development of infrastructure	Director at Site
	Provide access to food onsite to prevent hunting and theft of produce	<ul style="list-style-type: none"> Access to adequate food on site 	Continuous	Director at Site
	Partner with local NGO to implement a suitable Bush meat Hunting Awareness programme to inform communities about sustainable hunting practices	<ul style="list-style-type: none"> Documented agreement with local NGO Records of Awareness Programme meetings 	Prior to land clearing	HCV Manager
	Prohibit hunting or enabling of hunters within the plantation by workers and contractors	<ul style="list-style-type: none"> Company policy on hunting is available Records of species seized from hunters 	Continuous	Security and HCV Managers
	Establish clear signage indicating hunting ban	<ul style="list-style-type: none"> Signs are established at regular intervals throughout the plantation 	During land clearing	HCV Manager
	Restrict access to and search all vehicles entering and leaving the site; Seize and destroy and species found	<ul style="list-style-type: none"> Documented Standard Operating Procedure for security Control records Monitoring records of access roads Monitoring records of species sold by the road side Monitoring of elephant, buffalo and chimpanzee and gorilla sightings, counts and locations within boundaries Monitoring of prices of species sold in local shops Annual species surveys 	NA	HCV and Security Manager

3. Summary of Development plant

Olam Gabon Gross Block Area (± Ha)	Left out of Planting (± Ha)			
	HCV Area)	Road/ Facilities, others	Plantable Area	Total
31,800	21,904	0	9,896	31,800

4. Time Plan for New Planting

Planning of cultivation of palm oil in net area	Activity	Time Plan for New Planting	
		2014	2015
9,896 ha	Land Preparation	9,896	
	Planting	9,896	

Note: Land Clearing and planting will be commenced in 2014 and completed in 2015.

VERIFICATION STATEMENT:

The company opted for a document audit, BSI's auditors conducted desk study and discussions with the Olam Palm Gabon's management to verify and review the relevant documents from 09 – 11 December 2013. Subsequently, Olam Palm Gabon prepared and submitted the correction of documents by email for the verification purposes until completed by BSI on 13 December 2013. BSI also conducted a visit to communities surrounding the site to verify the social consultation in July 2013.

The auditors conclude that the social and environmental assessments and HCV assessment are detailed, comprehensive and professionally carried out. The management plan has included the findings of the SEIA conducted by Ecosphere consultants as well as incorporating the HCV assessments findings was conducted by Proforest, who the assessor approved by RSPO. Olam Palm Gabon has adhered to the RSPO New Planting Procedures and has documented the assessments and plans according to the RSPO templates issued in May, 2010.

It is the opinion of the BSI's auditors that the Olam palm Gabon has complied with the RSPO New Planting Procedures enforced on 1st January 2010 and confirmed that the assessment and plan are comprehensive, professional and compliant of RSPO New Planting procedures.

Signed on behalf of BSI,



Haeruddin
Lead Auditor

Signed on behalf of
Olam International Ltd



Alexandra Booth,
Manager-Sustainability, Palm Division