

Roundtable on Sustainable Palm Oil

New Planting Procedures

Summary Report of Planning and Management

Biase Plantations Limited (Calaro Extension Estate)

**Akamkpa Local Government Area
Cross River State
Nigeria**

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1. Executive Summary

1.1. Summary of Assessment Findings

Wilmar International is a major agribusiness group and one of the leading global producers, processors and merchandisers of oil palm and lauric oils. The company operates in more than 20 countries located in 4 continents across the world. Wilmar operates in the entire value chain of the agricultural commodity's production and processing; from growing, processing, transportation, and branding to merchandising. As a global leader in the agricultural commodities business, Wilmar is committed to ensuring that its operations meet international best practices as well as social and environmental sustainability requirements.

As part of the company's strategy to expand its palm oil production business in Africa, Wilmar sets up Biase Plantations Limited (BPL) a fully owned subsidiary of Wilmar Africa Investment Ltd which in turn is a direct wholly owned subsidiary of Wilmar International. Biase Plantations Ltd was fully registered in the Cross River State of Nigeria and issued with a Certificate of incorporation under the Nigeria's Companies and Allied Matters Act of 1990 in 10th February 2011. Biase Plantations Limited currently has three estates in the Biase and Akamkpa Local Government areas of the Cross River State in Nigeria. These are the Biase Estate, Ibiae Estate and the Calaro Estate. In 2012, Biase Plantations Ltd. initiated steps to expand its operations in the Calaro axis of its operations and hence acquired an additional land area for new plantings at Calaro Extension. Calaro Extension is an extension of the Calaro estates operated by Biase Plantations Limited and the area shares boundaries with the western corners of Calaro and consists of bush-fallows, farmlands as well as degraded forests. The area has a total size of 2,368.94 ha and has never been planted with any commercial oil palms.

The Calaro extension concession straddles two local government areas. The Uwet axis is located in the Akamkpa local government area, whilst the Atan Odot axis is located in the Odukpani local government area. The concession is located north of Calabar, and south of the villages of Atan Odot and Uwet. Mainly the Uwet Odot Forest Reserve borders it on the north side and the Oban Forest Reserve also borders it to the southeast side. There are farmlands and community lands mainly in the northeast and the southwestern parts of the concession.

As a member of the Roundtable on Sustainable Palm Oil (RSPO), Wilmar and all its subsidiaries including BPL are committed to ensuring that their operations comply with the RSPO certification requirements. An important first step to RSPO compliance requirements for new oil palm plantation development after 1st January 2010 is the RSPO New Planting Procedure (NPP) which requires all new oil palm plantation developments (i.e. those for which no work had commenced prior to 1st January 2010) to undergo a comprehensive independent impact assessment, including High Conservation Value (HCV) assessment, prior to conversion of

natural vegetation. The HCV assessment report that commissioned by BPL is aimed at fulfilling both the company's sustainability policy requirements and the RSPO NPP requirements.

Under the RSPO, oil palm plantation establishment is proscribed in all areas that contain primary forests, high conservation values, peatlands and local people's lands. Based on the field findings and the state and community level consultations, the HCV assessment team of Calaro Extension estate makes the following conclusions:

- a) That the allocated concession **does not consist of primary forests**, as defined under the RSPO requirements. Sections 4 and 5 of the HCV assessment report have illustrated the nature of the vegetation to comprise mainly of farmlands, bush fallows and secondary regrowth. That notwithstanding, there are patches of less degraded areas with tree cover within the concession and areas containing swamp forests which are recommended for protection.
- b) That **there are no areas of peatlands** within the concessions.
- c) That **there are communities living close to the concessions who hold claims of traditional tenure over parts of the concession area**, and who need to be engaged with so as to ensure that the company's operations are carried out with their full consent and that plantation establishment does not impinge on these claims/rights without their free, prior and informed consent. A team from Biase Plantations Limited had begun the process to engage with local communities towards this end.
- d) The HCVs within the concessions have been duly identified and mapped during the assessment process. **HCV 4.1** in particular will have to be delineated in the field and mapped systematically as land preparation process progresses. The High Conservation Values observed in the concession do not preclude the establishment of an oil palm plantation and an associated mill. However, the HCVs will have to be managed to ensure their continued existence and maintenance. Recommendations on managing the HCVs are presented in subsequent sections of the HCV assessment report.

Given the above conclusions and the feedback from BPL's community engagement process, the concession is considered to be generally suitable for oil palm plantation establishment under the RSPO's New Plantings guidance. That notwithstanding, all identified HCVs will be properly delineated on the ground and managed. Conversion of the non-HCV areas to oil palm plantation will demonstrate a net gain for the local economy and people, as per the social and economic provisions of the RSPO standard for sustainable palm oil.

Land acquisition process for plantations in the State

Until March 1978, the Cross River State had its own customary land ownership system. Under the pre-1978 land ownership system, communities, families and individuals owned the lands and they had the right to dispose of their land as and when they deemed necessary. However,

the introduction of the Landuse Act changed the ownership system. The Landuse Act of 1978 vested all lands in the State to the Governor (not ownership right but as a trustee of the land on behalf of the State). This Act was promulgated to allow government acquires lands for overriding purposes. Until the introduction of the Landuse Act, lands in Nigeria were acquired with no end in ownership right but the Act introduced a maximum lease period of 99 years. The governor of the State therefore has the right to issue Certificate of Occupancy (C-of-O) to individuals or companies after communities' consent has been sought. The Act stipulates that the Governor signs C-of-O personally. Communities' consent should be in writing and signed/thumb-printed by the chief and some elders. Although the Landuse Decree vests land ownership in the state, communities' consent must be sought before government can issue Certificate of Occupancy.

According to the requirements of land acquisition process in the state, investors such as Wilmar have two options of acquiring land for proposed projects in the state. Either the land is acquired on the investor's behalf by the State or the investor does it by negotiating with the communities directly. Government acquires land for investors only when the government has interest in the project or using the land as an equity share. If government is facilitating Wilmar's case, then it has interest. Once communities have consented to give out the land for the proposed project, a six-week notice of acquisition would have to be given for others with interest in the land to respond with their claims. The next action is survey of farms and crops and other properties on the land for compensation purposes. Communities, in given their consent, will present a list of traditional items for the company to pay for. This process must be completed for all communities with land contributions; communities with no land contributions are not eligible for this process, besides the crop and farm compensations that are paid based on government-standardised rates. Farmers automatically agree to move out once the chiefs agree to give out the land since the chief acts in the interest of the communities. There should be two levels of agreement: between the communities and the company and between government and the company (known as Certificate of Occupancy), which embodies the contents of the communities-company agreement. Communities generally include annual payments by the company in their agreement but this is based on negotiations between the communities and the company. Land for such investment is usually given for 99 years with review every 25 yrs.

Acquisition of the Calaro Extension concession by Wilmar

The Cross River State Ministry of Agriculture on behalf of Wilmar undertook the land acquisition for the Calaro extension oil palm project. Three land owners (Uwet community in Akamkpa LGA), and (Atan Odot community and Ikot Eyidok family unit of Etak Inoi community, Odukpani LGA), were involved. The CRS government and Wilmar signed a Deed of Grant that specifies the conditions for lease of the land. The duration of lease of the concession to Biase Plantations Ltd., according to the Deed of Grant, is Ninety-nine years (99 years) less one month. The Deed

of Grant also stated that Wilmar paid to the CRS Government to cover compensation to the host communities for economic crops and all unexhausted improvements on the land and infrastructural developments in the area, in addition to a one-time payment to the communities as was agreed for the performance of traditional rites required for acquisition of the land.

Based on the Social Impact Assessment, it appears that although some potential negative impacts are foreseen, the landlord communities generally believe that the project would have overall net positive impacts on the populations and communities in the area. The various social groups in the host communities indicated their unanimous acceptance of, and support for the project and are not contesting the lease of the concession to Biase Plantation Limited. The consensus of the State-level stakeholders consultation was that the development would have net positive impacts if carried out according to the laid-down regulations and terms agreed with the communities and the State government.

Social impact statement

The findings of the SIA carried out in the concession area for Biase Plantations Ltd suggest that the development will create long and short term employment, rural development and business opportunities not only for the local populations in the landlord communities but also for other communities near and far. The proposed intervention was also found to be consistent with the Cross River State agricultural policies and planning and will represent a major investment in oil palm development in the State and in Nigeria at large, thus representing a positive social benefit for the Nigerian economy as a whole. These benefits, notwithstanding, the intervention could potentially impact adversely on local populations' access to farmlands and other natural resources. Although the potential negative impacts may not constitute a serious flaw of the project, recommendations have been provided in which to be adopted & implemented by Biase Plantations Ltd to ensure that the potential negative impacts are minimised, if not completely avoided.

From the Environmental Impact study conducted by Andelsta Ltd Consultants, it can be concluded that there is potential impact by the presence of Calaro Extension estates towards the environmental impact to the area. The possible environmental impact that can occur in this project can be divided into 4 phases of its development - namely, Site preparation/Construction phase, Palm oil base/Company phase, Operation & Maintenance phase and Decommissioning phase. These impact can be broadly summarized as increased soil and vegetative cover disturbance, existence of solid and liquid effluents, reduction in water quality, reduction in air quality and increased air emission regard with increased use of combustion engines, increased in noise level, increased in surface run-off, increased in soil erosion and sedimentation and finally potential for open burning.

The Environmental Impact Assessment (EIA) study carried out by Andelsta Ltd. Consultants, concluded several things that need to be highlighted as follows:

- a) The proposed project if implemented, shall boost oil palm, palm kernel oil (PKO) and palm kernel cake (PKC) production and the production of other related by-products.
- b) The proposed project shall provide employment for Cross River indigenes, create jobs, boost the state economy, and overall support sustainability in the state.
- c) The proposed project would assist in training University students in the field of agriculture and molecular biology during Industrial attachment periods.
- d) The project shall also improve agricultural skills and other technical skills of workers and staff of the company.
- e) The Company shall ensure that the proposed project is implemented and operated in a manner that would not impact adversely on the immediate environment.
- f) There is a general conclusion that the proposed project shall impact positively on the socio-economic lives of the people with respect to income generation, job creation, skill acquisition, employment opportunities, poverty reduction, food security, confidence, motivation and general self-believe.
- g) Adequate mitigation measures shall be put in place or implemented to minimize odour, smoke and particulate matter emissions and disease vectors from the operation of the proposed project and control wastes and erosion caused by the implementation of the proposed project and its activities.

The EIA Final report that has been produced after completing the panel review process as required by the law in Nigeria and taking into consideration the recommendations of the members of the panel, supported with an Environmental Management Plan (EMP) and a Waste Management Plan (WMP), making a robust plan of implementation that will carter for the potential negative impacts.

1.2. Assessment result

The Social and Environmental Impact Assessments (SEIA) were detailed, comprehensive and professionally carried out. The management plans have included the findings of the EIA, HCV and Social Impact assessments by consultants accredited and approved by the RSPO – Proforest (and for EIA, a consultant approved by the Nigerian government – Andelsta Ltd Consultants). Biase Plantations Ltd has adhered to the RSPO New Planting Procedures and has documented the assessments and plans according to the RSPO templates issued in 2015. An audit team from TUV Rheinland Indonesia conducted desk study / verification of documents and field verification at the project site on 10th – 12th March 2016 and they confirmed that the assessments and plan are comprehensive, professional and compliant to the RSPO principles, criteria and indicators. The audit team members are Hendra Fachrurozy (legal land, company aspect, environment & social aspect) and Riswan (HCV aspect) and 1 (one) local expert - Frank Adu.

2. Reference Documents

2.1. Lists of Reports

- i. Social Impact Assessment of the Calaro Extension oil palm concession for Biase Plantations Ltd, Cross River State, Nigeria. September 2014, by Proforest.
- ii. An assessment of High Conservation Values in the Calaro Extension Estate of Biase Plantations Ltd, Cross River State, Nigeria. September 2014, by Proforest.
- iii. Environmental Impact Assessment (EIA) of Calaro Extension oil palm plantations, Biase Plantations Ltd, Nigeria. September 2014, by Andelsta Ltd Consultants.
- iv. Permit register.
- v. Land release and compensation record from local government/privatization council.
- vi. Minutes of Meetings with Communities on Public awareness of the Project (FPIC- Free Prior and Informed Consent).
- vii. Soil and Feasibility Report.

2.2. List of legal documents, regulatory permits and property deeds related to areas assessed

Legal documents

The list of legal documents reviewed includes:

- a) The Cross River State of Nigeria Forestry Commission Law 2010
- b) National Environmental (Control of Bush, Forest Fires and Open Burning) Regulations, 2011
- c) National Environmental (Surface and Groundwater Quality Control) Regulations, 2011
- d) National Environmental (Watershed, Mountainous, Hilly and Catchment Areas) Regulations, 2009
- e) Federal Environmental Protection Agency Act
- f) National Biodiversity Strategy and Action Plan
- g) National Minimum Wage (Amendment) Act of 2000
- h) National Policy on Environment 1999
- i) National Environmental (Sanitation and Wastes Control) Regulations 2009
- j) The National Environmental (Watershed, Hilly, Mountainous and Catchment Areas) Regulations, 2009
- k) National Land Use Act of 1978

Regulatory permits and property deeds

The regulatory permits reviewed as part of this assessment includes:

Table 1. Relevant legal documents, regulatory permits and property deeds of BPL

No.	Permits	Remarks
1	Memorandum of Understanding	Memorandum of Understanding between the Cross River state council on privatization and Uwet & Atan-Odot Communities/Ikot Eyidok Family, acquiring the said lands for oil palm plantation establishment
2	Deeds of Grant	CR Government agreement with Biase Plantations limited leasing the said lands to BPL for a period of 99 years
3	Environmental Impact Assessment (EIA) of Calaro Extension oil palm plantations	Site verification exercise on 15 April 2015 by Federal Ministry of Environment has been concluded that EIA study need final panel review to produce the EIA final report and will support with Environment Management Plan & Waste Management Plan. Due to this process Federal Ministry Environment will issued the EIA Interim Approval.
4	Environmental Impact Statement (EIS)	

2.3 Location maps – both at landscape level and property level

The Calaro Extension Estate is located in the Akamkpa Local Government Area and Odukpani Local Government Area in the Southern Senatorial District of the Cross River State. Calaro Extension estate lies approximately 60 kilometres north of Calabar on the Calabar-Uyo highway, in the vicinity of the Cross River, with its westernmost edge at 5°13'N and 8°11'E (Figures 1, 2, 3). Two main villages namely Uwet and Atan-Odot surround the estate (Figure 2).

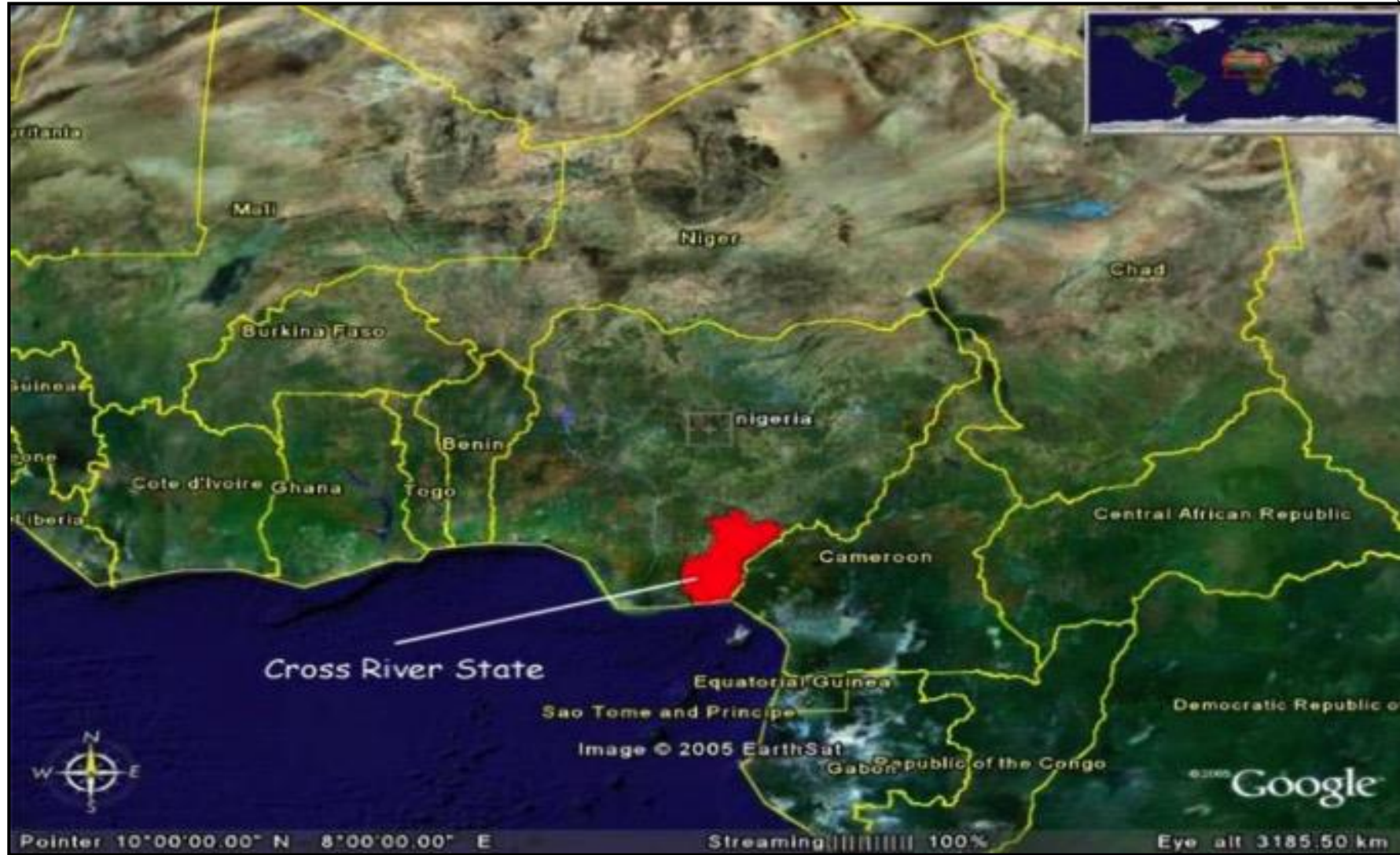


Figure 1. Map of Western Africa with location of Nigeria and Cross River State

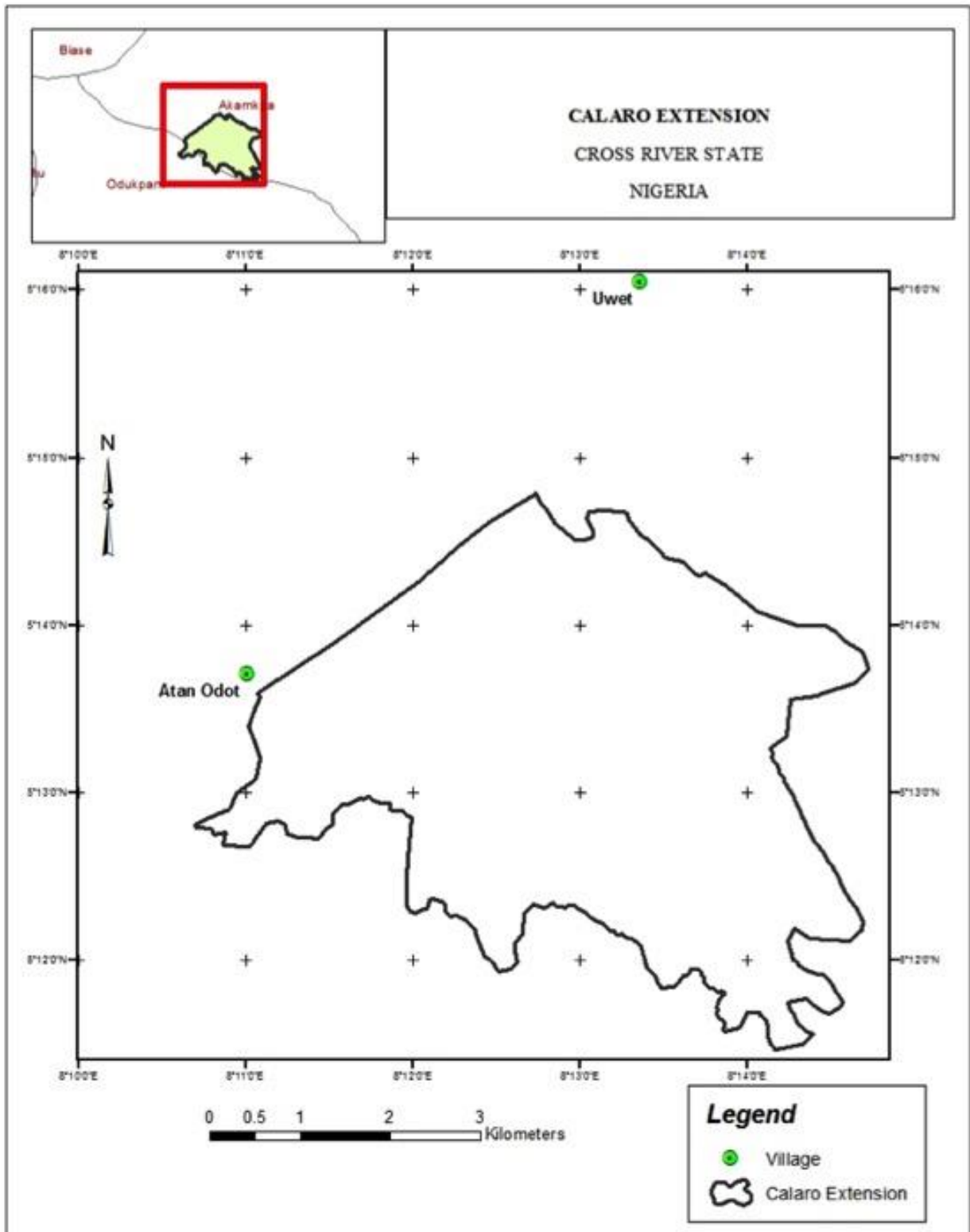


Figure 2. Map of the Calaro Extension Estate with locations of two villages surrounded

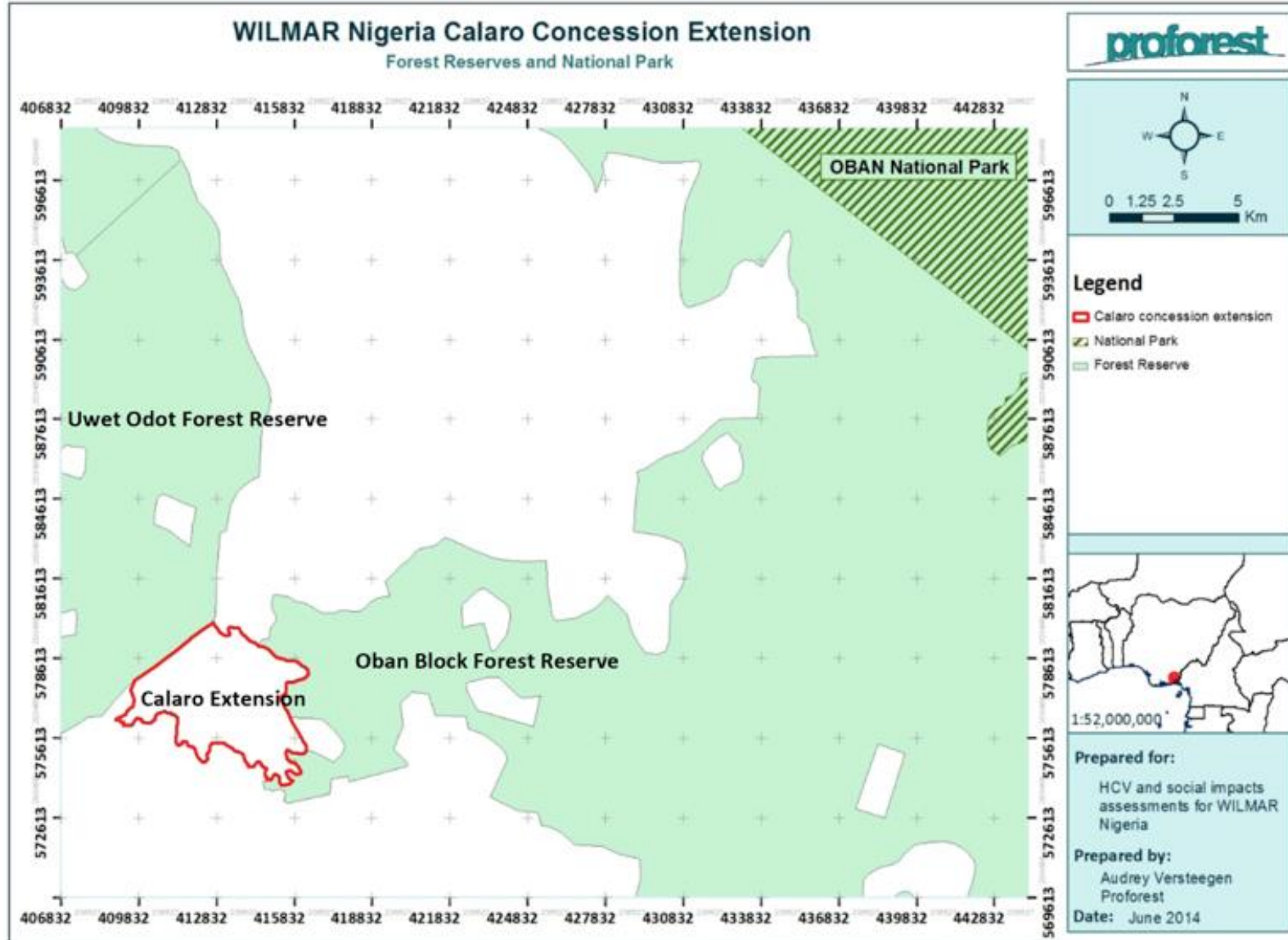


Figure 3. Map of the Calaro Extension Estate showing different protected areas in the landscape

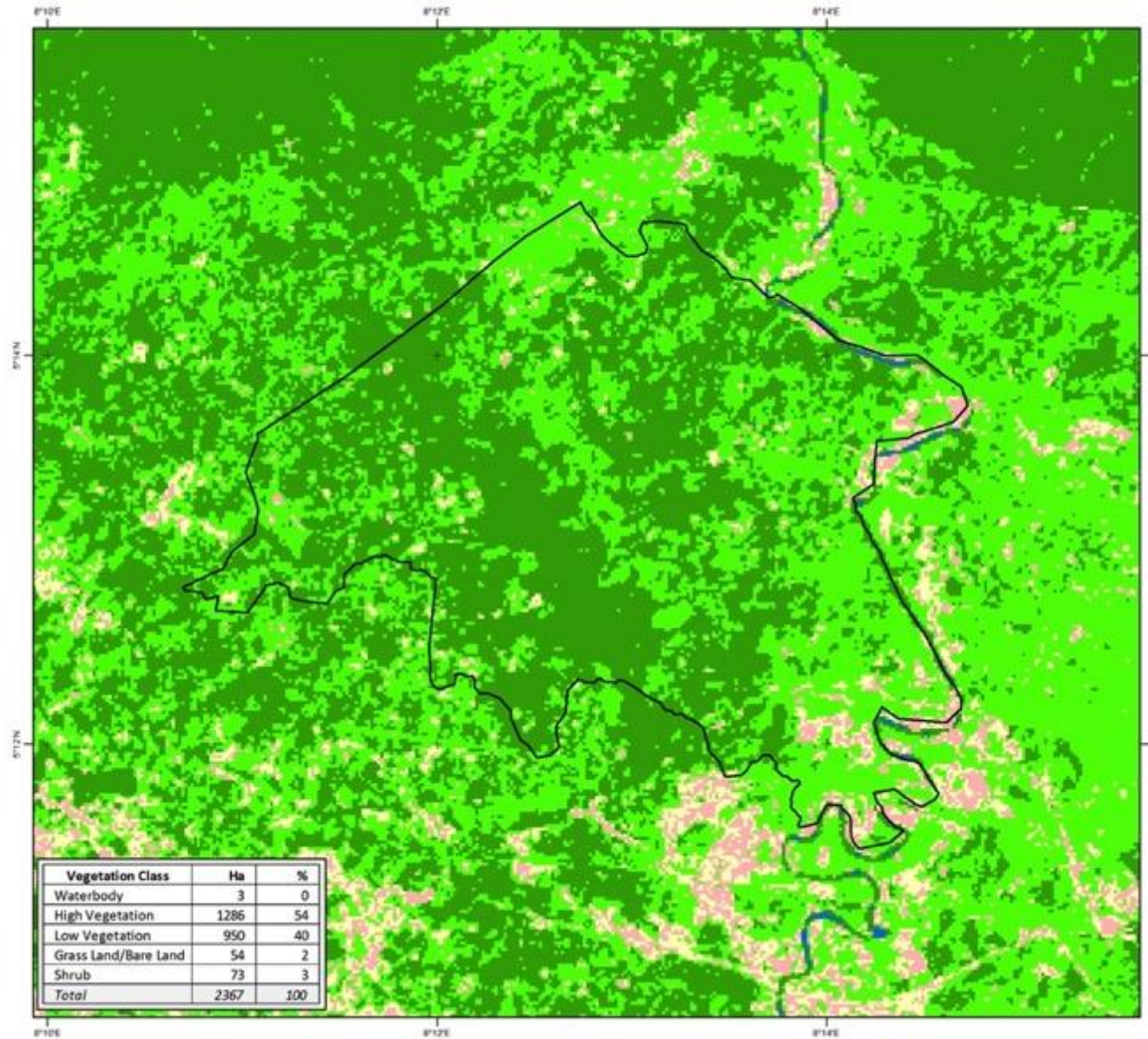


Figure 4. Satellite imagery of Calaro Extension Estate showing its vegetation class

2.4. Area of new plantings and time-plan for new plantings

As defined by RSPO Procedure for New Planting Guidance document dated 12 May 2010, all of the total area of Calaro Extension estate 2,368.94 ha will undergo the new planting procedure. The company intends to plant all the available areas within the Estate with oil palm except the identified HCV management areas and recommended buffer zone limits for water bodies.

3. SEIA and HCV Management and Planning Personnel

3.1. Organizational information / contact person

Contacts details of the company are as follows:

Company Name:	Biase Plantations Limited
Address:	Calaro Estate, Mbarakom village Sub District: Akamkpa Local Government Area District: Cross River State Country: Nigeria
Contact Person:	Sustainability Manager (Asen Ako)
Telephone:	+2348158066794
Email:	asen.ako@ng.wilmar-intl.com
Capitals Status:	Foreign Investment Company
Status Business Land:	Country Lease
Total Area:	2,368.94 ha (Calaro Extension Estate)

3. Management and implementation plan of the proposed area

3.2. Personnel involved in planning and implementation

Those involved in the planning and implementation will be General Manager, Estate Manager, Community & Public Relation, Legal & Government Relation, Biodiversity, Environmental Health and Safety Department. Generally, the organization chart shows as below.

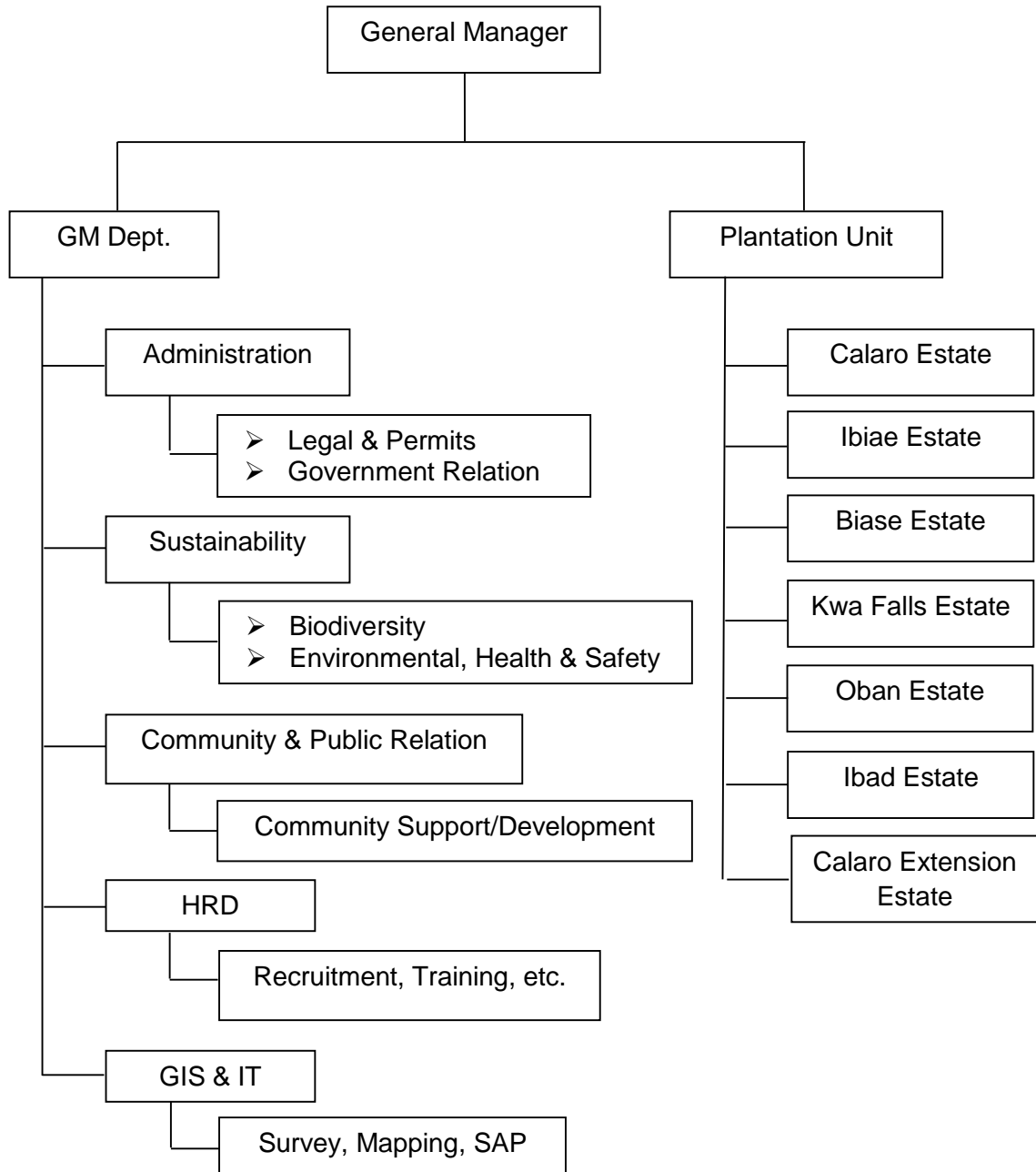


Figure 5. Organization chart involved in planning and implementation

3.3. Stakeholders to involve

Local communities who are and will be affected by the development of Biase Plantations Limited as identified in the Social & Environmental Impact Assessment report. Relevant government departments will also be involved.

4. Summary of Management and Mitigation Plans

4.1. Summary of Social Environmental Impact Management and Mitigation Plan

The following management and mitigation measures have been arranged for adoption and implementation to address the significant potential social and environmental impacts in order to make the project socially acceptable and beneficial. Summary of the Mitigation Plan is described as shown in the table below:

a) Preservation of community farmlands

As much as possible, the company has avoided conversion of active farmlands. In cases where this is unavoidable, the company had engaged the would-be-affected party for their free, prior and informed consent. This involved valuation of crops/land, agreeing on a compensation package and payment of the agreed compensation prior to conversion. Most of the community farmlands are located outside the concession.

b) Ensuring food sufficiency

During the consultations of SIA, the farmers mentioned the lack of modern farm implements, lack of credit and inputs as constraints to farm productivity. Given that food crop production and processing form the backbone of subsistence, livelihood and income for the communities, it is recommended that Biase Plantations Limited, as part of its corporate social responsibility and community development policy, considers assisting local farmers to increase productivity through extension service support, and provision of farm inputs/implements and credit based on agreeable terms with the farmers.

c) Minimize impact of migrant workers on local socio-cultural structures

It is recommended that the company gives priority to employing workers from the local communities, provided they have the requisite knowledge and expertise. Furthermore, the company should endeavor to regularly sensitize migrant workers to respect the existing local socio-cultural structures and systems, and take punitive actions against workers found to consistently and grossly undermine these systems.

d) Identification and appropriate management of traditional conservation areas including other high conservation values in the landscape

The communities identified some of the conservation areas during the participatory mapping exercises undertaken as part of the SIA fieldwork, shown on Annexes 1, 2 and 3 of the SIA report. The company's High Conservation Value (HCV) assessment of the concession area also identified such areas and prescribe best management practices. It is recommended that the company implement the recommendations of the HCV report.

e) Minimizing water and air pollution

Given that the Uwet river and other streams are the major sources of drinking water and water for other domestic uses of host communities, the company must avoid polluting these waters through development and implementation of a Water Management Plan which, among other things, preservation of riparian buffers and prohibition of chemical use in those areas; development and implementation of a Waste Management Plan that ensures that potential POME, sewage and other waste do not end up in the rivers and streams; provision of alternative source of safe water (e.g. boreholes).

To minimize air pollution, it is recommended that the company continually pursues cleaner production technology in the mill in order to reduce the amount of smoke released; install a system that captures methane from POME for use as energy where cost permits; and reduce dust pollution from roads through frequent watering in dry seasons, gravelling (where permissible) and enforcing speed limits.

f) Public and occupational health and safety measures

Biase Plantation Limited should develop and implement Standard Operating Procedures (SOPs) to cover all of its operations. Health and safety risk assessments should also be carried out for all operations and appropriate preventive and remedial actions implemented. With regards to public safety, the company should exercise utmost caution when transporting personnel, equipment, palm fruits, palm oil, etc. through the communities and also during operations such as road construction and maintenance. It is also strongly recommended that the company provide health care services for preventive (i.e. health education on HIV) and remedial purposes.

g) Reduce pressure on existing community infrastructure through corporate social services to communities

As part of the company's corporate social responsibility, it is recommended that the company, upon consultations with all community groups, assists with the provision/expansion of amenities such as schools, clinics, markets, etc. Should the company cause damage to any public infrastructure as a result of its operations, steps should be taken to fix the damage as soon as possible.

Table 2: Summary of SEI Management and Mitigation Plan in the Calaro Extension Estate

Action / control to mitigate	Responsibility	Timeframe
Mitigation target/objective: Avoidance of damage to farmlands and other community lands		
Where farmlands or other community land would be affected by operations, ensure that Free, Prior and Informed consent of farmers are obtained and appropriate compensations paid prior to commencement of the operation.	Biase Plantations Ltd	Prior to and during project development and implementation
Continue engagement with local communities.	Biase Plantations and communities	Throughout the development
Mitigation target/objective: Ensuring food sufficiency		
Consider supporting the introduction of high yielding varieties of crops to increase productivity.	Biase Plantations Ltd; CRS Ministry of Agric	As and when identified as viable option
Consider supplying farm inputs and credit to farmers on agreed terms.	Biase Plantations Ltd	Throughout project implementation
Consider provision of agricultural extension services to farmers.	Biase Plantations Ltd	Throughout project implementation
Consider provision on modern farm implements and processing mills (e.g. cassava mill) on terms agreed with the communities.	Biase Plantations Ltd	Throughout project implementation
Mitigation target/objective: To minimize influx of plantation workers and its implications for communities' family structures and social networks		
Priority should be given to host communities for all categories of workers to be recruited provided they have the requisite knowledge and expertise.	Biase Plantations and communities	Throughout the project's life
Sensitize migrant workers on the need to respect the local socio-cultural systems.	Biase Plantations	Throughout the project
Monitor the conduct of workers in the communities (through regular interactions with the communities) and take disciplinary actions against those found to consistently and grossly undermine the local norms and value systems.	Biase Plantations, Host communities	Throughout the project
Monitor social impacts of operations on local communities and population.	Biase Plantations Ltd	3 Years after commencement, then biennially
Mitigation target/objective: To ensure that plantation development and processing activities do not destroy traditional conservation, HCV and NTFP collection areas		
Adoption, implementation and monitoring of HCV, SIA and EIA recommendations.	Biase Plantations	Throughout project life
Continuous engagement with host communities.	Biase Plantations and communities	Throughout project life
Compliance with policies legal, regulatory and traditional systems.	Biase Plantations	Throughout project life
Training and instructions for field operators and supervisors.	Biase Plantations	Annually

Effective and efficient monitoring of plantation management and operational plans.	Biase Plantations	Throughout project life
Support enforcement of measures (in collaboration with the relevant state institutions) to control unauthorized activity in HCV areas.	Biase Plantations	Throughout project life
Mitigation target/objective: Minimizing water pollution		
Adopt and implement impact assessment management recommendations (HCV and EIA).	Biase Plantations	Throughout project life
Develop, implement and review a detailed Water Management Plan.	Biase Plantations	Prior to and during project implementation
There shall be no development in buffer zones and watershed. Riparian vegetation must be maintained and chemical use prohibited.	Biase Plantations and contractors	Throughout project life
Develop a detailed Integrated Pest Management Plan which permits use of chemicals as a last resort.	Biase Plantations	Prior to nursery and plantation establishment
Only agro-chemicals registered by the National Environmental Standards and Regulations Enforcement Agency (NESREA) or those allowed under Nigerian laws should be used.	Biase Plantations	Throughout project life
Develop and implement instructions for application of agro-chemicals.	Biase Plantations Ltd	Before plantation field activities
Persistent Organic Pollutants banned under Stockholm Convention of 17 th May 2004 should not be used.	Biase Plantations	Throughout project life
Develop and implement a Waste Management Plan.	Biase Plantations	Prior to and during project implementation
Dumping of waste (including POME) into water bodies must be avoided but where necessary, the waste should be treated to an acceptable standard (as per NESREA requirements).	Biase Plantations and contractors	Throughout project life
Respect and comply with legal and regulatory requirements.	Biase Plantations and contractors	Throughout project life
Mitigation target/objective: Minimize air pollution		
Ensure recommendations contained in EIA are fully implemented.	Biase Plantations and contractors	Throughout project life
Implement dust suppression measures for vehicles such as wetting of roads on regular basis during dry seasons and as and when necessary (i.e. surface treatment), gravelling or application of palm kernel shells on roads (surface improvement), reducing traffic and enforcing speed limits on dusty roads.	Biase Plantations and contractors	Throughout project life
Continually pursue cleaner technology in the mill to reduce smoke emissions.	Biase Plantations Ltd	Throughout project life

Install a system that captures methane from effluent ponds for use as energy.	Biase Plantations	As and when the company can afford the technology
Mitigation target/objective: To avoid or minimize the exposure of workers and local communities to health and safety risks		
All tasks should be risk assessed.	Biase Plantations	In 1st year of operation
Standard Operating Procedures should be developed for undertaking operations and implemented.	Biase Plantations	Prior to and during project implementation
Application of agro-chemicals should be in strict compliance with manufacturer's instructions and generally established safety procedures.	Biase Plantations	Throughout project life
Workers should be provided with PPEs appropriate to each task.	Biase Plantations	Throughout project life
Skills audits should be undertaken to determine training and skills development requirements.	Biase Plantations	Throughout the project
When required, implement training and skills development programs for employees.	Biase Plantations	Throughout the project
Ensure all vehicles are in good working condition, drivers are qualified and adhere to road safety rules.	Biase Plantations	Throughout project life
Ensure workers have appropriate and safe means of transport to and from work site.	Biase Plantations	Throughout project life
Ensure drivers adhere to speed limits and institute and implement sanctions against violators.	Biase Plantations	Throughout project life
Regular assessment of medical status of workers in high risk task areas (e.g. chemical handlers).	Biase Plantations	Throughout project life
Ensure that loads are secured safely on vehicles during transport.	Biase Plantations	Throughout project life
Adoption and implementation of health education programs (e.g. on STDs) for workers and communities.	Biase Plantations and Workers Unions	Throughout project life
Provide remedial healthcare services for workers and communities.	Biase Plantations	Throughout project life
Mitigation target/objective: To minimize impacts of operations on public facilities		
Where feasible, Biase Plantations should provide similar facilities or infrastructure for its operations.	Biase Plantations	As and when necessary
Ensure that damage caused to public facilities are appropriately fixed and within reasonable timeframe.	Biase Plantations and contractors	Soon after damage is identified
Develop guidelines for key activities that could potentially impact on public facilities.	Biase Plantations	Within 2 years of operations
Regular and effective monitoring of operation's impacts on public facilities and infrastructure	Biase Plantations	To be part of monitoring

Support to the development of public facilities and infrastructure (e.g. schools, road building and maintenance, electricity etc.)	Biase Plantations	Throughout project life
Mitigation target/objective: To avoid displacement of communities and people		
Measures shall be taken to avoid displacement of communities and people	Biase Plantations	Throughout project life
Where displacement of people and/or communities are necessary measures are taken to ensure their Free Prior and Informed Consent are sought	Biase Plantations	Throughout project life
Where displacement of people and/or communities occur appropriate and acceptable compensations are paid	Biase Plantations	Throughout project life
Displacement of people and/or communities are carried out in accordance with Nigeria's legal requirements and international best practice	Biase Plantations	Throughout project life
Mitigation target/objective: To maximize local employment and ensure reasonable quality of life and working conditions of workers in plantations and mills		
Ensure workers' conditions including salaries and wages are at least the same or exceeds the conditions for similar category of work in Nigeria	Biase Plantations and contractors	Throughout project life
Dialogue, regular interactions and effective communication with workers' union	Biase Plantations and Workers reps	Throughout project life
Develop and implement code of conduct to cover the activities of workers' house on site	Biase Plantations	Throughout project life
Ensure workers have appropriate and safe means of transport to and from work site	Biase Plantations	Throughout project life
Adopt and implement disputes and grievance resolution policy	Biase Plantations	Throughout project life




4.2. Summary of HCV Management and Mitigation Plan

In order for Biase Plantations (Calaro Extension Estate) Ltd to meet the RSPO certification requirements particularly those related to the NPP, it is crucial that the company implements the recommendations described in the HCV assessment report. To ensure that the field operations follow the steps indicated in the report, Biase Plantations Ltd (Calaro Extension Estate) will designate a person responsible for monitoring the implementation in the field of the measures for protecting and maintaining HCVs in the Calaro Extension Estate. This person will be given the authority, time and resources to train staff properly, prepare robust Standard Operating Procedures (SOPs) including recommendations contained in the detailed HCV report and to organize the plan activities before the conversion operations, and to monitor them in the field. Summary of the Mitigation Plan will be elaborated and adopted by Biase Plantation Ltd (Calaro Extension Estate) to ensure effective maintenance and enhancement of the identified HCVs.

Table 3. Summary of HCVs identified with management plan for Calaro Extension Estate (BPL) are show in the table below.

HCV	Findings	Management Objective	Spatial Presence	Management Plan
1.1 Protected Areas	Boundaries with the Uwet Odot and Oban Forest Reserve	To ensure the maintenance of adequate buffer zone to reduce impact of operations on nearby PAs		To maintain a 100m buffer zone along the boundaries with the forest reserves. No conversion to take place in these buffer areas
1.2 Rare, threatened, endangered species	Slender snout crocodile and Sitatunga	To ensure maintenance of the population of Slender-snout crocodiles and Sitatunga. Maintain populations of other threatened species	Few individuals of the slender-snout crocodile and the Sitatunga known to be present in Nigeria	The recommended set aside swampy area is excluded from conversion. The population of the endangered species is monitored on a regular basis
3 Rare, threatened, endangered ecosystems	Swampy vegetations	To maintain swamps and their vegetations to continue to serve as habitat for species	Blocks of swamps dispersed through the concession	The recommended set aside swampy area is excluded from conversion. The population of the endangered species is monitored on a regular basis
4.1 Forests critical to water catchments	Riparian buffers	To ensure perpetual flow of clean water and fishery resources for the host communities by setting aside and maintaining appropriate buffer zones for all rivers and streams in the concessions.	All rivers in the concessions	Riparian vegetation and buffering of rivers and streams. 10m at each side of streams < 5 metres width, 50 m buffer for rivers 5 < 20m width and 100 m for rivers with width <20m. Management recommendations include protection and maintenance of buffer zones, erosion control practices for all areas with slopes of above 5 degrees.
5 Critical livelihood sources	Present at the Ababua River and riparian buffer zones	To ensure that the oil palm plantation development programme does not threaten communities' access to water resources.	Rivers in the concession	Implementing the recommended buffer zone and erosion control measures.

Table 4: Summary of HCVs Mitigation Plan in the Calaro Extension Estate

Legend			
Actions to be implemented:			
	Before conversion	During conversion	After planting

Objective	HCV Ref	Action to mitigate	Monitoring measures / expected result	Timeline
Maintaining water quality and the HCVs it supports				
Protection of rivers	4.1	Buffering of water bodies Water bodies in the concessions serve as sources of water and as fishing grounds for communities in the area and are therefore classified as HCV 4.1	Set aside buffer zones included in GIS database as HCV 4.1	
	ALL	Accurate mapping of all HCVs and their management areas in the concessions should be carried out including mapping of steep slopes.	Availability of accurate maps of all HCVs management areas	
	ALL	Designation of a responsible person for all “HCVs” to provide training and ensuring that field workers adhere to management recommendations for HCV areas		
	1.2, 1.4, 4.1	Workers and staff responsible for HCV delineate 10 metre buffer zones on each side of streams (<5m width) HCV field team to delineate 50-meter buffer zones on each side of rivers with width of 5-20m	Measure river width/buffer zone width Buffer zones included in GIS database Measure river width/buffer zone width Buffer zones included in GIS database	

		HCV field team to delineate 100 meters' buffer zones on each side of major rivers with width greater than 20 m e.g. the Cross River)	Measure river width/buffer zone width Buffer zones included in GIS database	
	1.2, 1.4, 4.1	Land preparation teams are trained to respect buffer zones	Evidence of training and understanding of buffer zones management and monitoring recommendations and requirements Buffer zones are respected	
		Land preparation teams are provided with maps of areas identified as protected areas		
		Land preparation teams are trained to carry out land conversion laterally to buffer zones to avoid having it destroyed by falling trees and shrubs	No impact on buffer zones	
	ALL	Regular monitoring to ensure that buffer zones requirements are respected If buffer zones are not respected, corrective actions must be taken immediately	Corrective actions record	
		Bridges and means of crossing rivers must be pre-planned		
		Bridges and means of crossing rivers must be done according to recognized best practices	Check erosion around bridges	
Erosion control	ALL	HCV or environmental management field team are trained to implement and respect erosion control recommendations	Training records and proof of application of required measures	
	1.2, 1.4, 4.1,	Areas with slopes above 25 degrees are excluded from conversion	Areas above 25 degrees are delineated on the ground and recorded in GIS database and on maps	

	4.2			
		Areas with slopes between 18 and 25 degrees are identified and mapped. Such areas may be planted on condition that erosion control measures such as terracing is implemented.	Area delineated on the ground, recorded in GIS database and appropriately mapped.	
		All areas with slopes categories are mapped in GIS database	GIS database – Slopes map	
		Conversion team/Road construction team trained to implement erosion control measures	Training records and application of measures in practice	
		Roads are planned prior to conversion to avoid being perpendicular to slopes and to avoid fragile soils	Road map – Contour map	
		SOP for terracing is completed before conversion	Records on SOP	
		Cleared vegetation is windrowed	Evidence of windrowed in the field	
		Road soak-aways are built depending on downslope of road being constructed	Frequency/slope	
		Silt pits are built to avoid sediments being discharges into rivers		
	1.2, 1.4, 4.1	Appropriate leguminous cover crops and native tree species that do not have invasive properties are selected for revegetating denuded buffer zones to avoid invasiveness	Biase Plantations should justify the choice of tree species and leguminous crop	

		Cover crops are planted immediately after conversion to avoid erosion of soils during the first rains	Date of planting	
Monitoring of water quality	1.2, 1.4, 4.1	Annual water quality testing for major rivers and all other rivers that are sources of water for host communities	Test results	
		Regular meetings with the host communities on control and prevention of water pollution	Minutes of meetings	
		SOP in place for Corrective/Preventive action to be taken in case of degradation of water quality	Documented SOP	
Respect and Maintain local populations basic needs				
Implementing FPIC	5, 6	Build a community liaison team		
		Biase Plantations Ltd should define its FPIC process and arrange for competent body to undertake FPIC	SOP	
		Discuss and negotiate with the host communities, appropriate consultation processes including frequency of community meetings	Community representative list	
		Define conflict resolution procedures with local communities	SOP	
		Identify appropriate management areas for the Akpa Uwet enclave and the Ababuo fishing grounds and delineate those areas on the ground	Social HCV areas included in GIS data base and mapped	

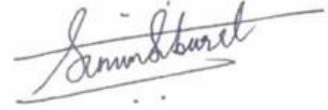
		Negotiate management decisions for HCV areas following the company's FPIC procedures	Signed agreement with community/concerned people	
Monitoring result		Regular (twice a year at the beginning of the project, minimum once a year after relation with communities are strengthened) evaluation of changes in communities' needs.	Minutes of meetings	
Fauna Conservation Program				
Monitoring of fauna species and populations in the set-aside areas	1.2	Periodic fauna survey of the set aside areas during the major rainy season	Survey report	
	1.2	Monitoring the population and dynamics of the Sitatunga and the Slender-snout Crocodile and the recommended management areas	Monitoring reports	
	1.2	Fauna survey of the set-aside areas during major dry season	Survey report	
		Delineation of the buffer zones adjacent protected areas at Uwet Odot FR and Oban FR on the ground	Survey report – GIS database and maps	
		Plan workers quarters/housing if possible in existing city/villages to reduce the impact of external worker hunting on wildlife	Workers quarters – GIS database	
		Biase Plantations Ltd shall implement community education programme on hunting particularly hunting of RTEs and during “no hunting seasons” as stipulated by law	Records of any educational or any other programme undertaken to address issues with hunting Records of community educations conducted.	

		Develop and implement “No hunting” policy for employees including the use of snares and trapping for hunting	Company policy	
		Biase Plantations Ltd shall strive to prohibit hunting within its concessions	Company policy	
Conversion operation				
	N/A	Land conversion operations shall start during the dry season unless there are compelling reasons to do so during a rainy season	Records on starting dates for operations	
	N/A	Land conversion should start away from the protected areas and moving gradually towards those areas		
Scientific Research				
	N/A	Development of partnership on hydrology research		
Implement recommendation in the field				
	N/A	Designation of a responsible person for monitoring the field implementations of HCV management recommendations		

5. Internal Responsibility

Acknowledgement of internal responsibility by Biase Plantations Limited

I the undersigned, being the legal
representative of the inspected company,
agree with the contents of this report



Name: Simon Siburat
Title: GM Group Sustainability