

**RSPO**

**PROCEDURES FOR NEW PLANTATIONS (NPP)**

**COMPANY:  
COMPAÑÍA PALMA TICA S.A.**

**PLANNING AND MANAGEMENT SUMMARY**

**PREPARED BY:**



**BIO TERRA CONSULTORES AMBIENTALES**

**COSTA RICA, FEBRUARY 2013**

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## **1. Executive Summary**

Compañía Palma Tica S.A. founded the first African Oil Palm plantations in 1944. Its crops are currently concentrated in the south region of Costa Rica. However, the Company is expanding its crops to other regions in the country.

Currently, one of the Company's projects is to develop new African Oil Palm plantations in the northeastern region of the country. This project is the object of this study.

The Management Plan is structured around each of the impact generating activities. Each one of these activities is assigned one or more environmental or social protection standards and their compliance must be supervised and controlled through the different phases of the Project, by those responsible of environmental issues, the environmental authorities (SETENA) and the community in general.

The purpose of the Management Plan is to establish an adequate and reasoned balance between the activities in each phase and the environmental and social support conditions.

This makes a control instrument available, in order to provide follow up and application of the protection, control, and/or compensation measures proposed. This is up to the different external parties involved, such as the competent state institutions, local community, environmental managers, and of course of the Company Palma Tica S.A.

Complying with the purpose and objectives will contribute, not only to guarantee that certain particular actions are executed, but also to improve the social and environmental conditions in the study area, preventing and/or mitigating the negative impacts, or compensating for those that are inevitable and maximizing the positive ones.

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## 2. Reference Documents

### 2.1 SEIA and HCVA Evaluation Reports

**Study: Criteria 7.1. RSPO Standard**

(Compañía Palma Tica S.A. – Atlantic Division)

Marisol Zumbado Bustillos

**RSPO Accredited Team Leader**

Biologist, majoring in ecology and sustainable development

Master in Environmental Audit and Management, specializing in management and conservation of natural resources

Biologists Association: 1416

SETENA Consultant: CI-091-2007 (before) / CI-144-2012 (current)

**Evaluation of the High Conservation Value Areas (HCVA). Procedure for new plantations**

(Compañía Palma Tica S.A. – Atlantic Division).

Darién Zúñiga Leitón

Biologist, majoring in ecology and sustainable development.

Master in Environmental Audit and Management, specializing in integral water management and recovery of contaminated soils.

Biologists Association: 1519

SETENA Consultant: CI-079-2007 (before) / CI-143-2012 (current)

**Characterization of social impacts generated by the activity of new African Oil Palm plantations** (Compañía Palma Tica S.A. – Atlantic Division)

Mario Antonio Piedra González

Sociologist, M.Sc. Public Health

Sociologists Professional Association: 12-0235

SETENA Consultant: CI-021-1996

**Soil Exploration Surveys**

(Compañía Palma Tica S.A. – Atlantic Division)

Dr. Carlos A. Cervantes Umaña

Ph.D. Soil Sciences, U of Columbia, Missouri

Soils Specialist.

Agricultural Engineering Association: 1134

Evaluator for Proper Soil Use: No. 44

SETENA Consultant: CI-084-2009

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## **2.2 List of the legal documents and permits related with the areas evaluated**

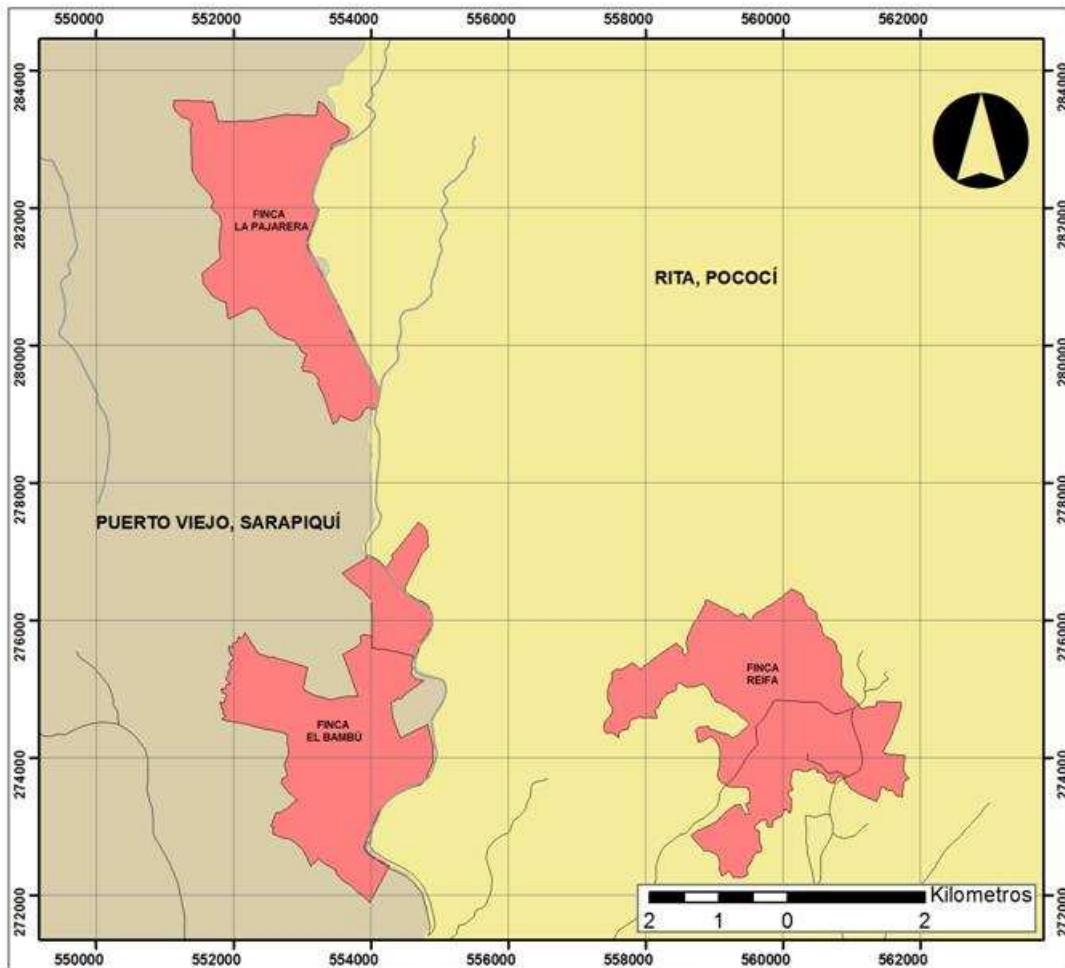
At the present time, Environmental Viability is being processed in the National Environmental Technical Secretariat (SETENA), for the new proposed plantation. The Project has been assigned case number #9077.

Simultaneously, the certification for the new proposed African Oil Palm plantations is being processed with the RSPO. For this reason, the present report is being issued.

Once Environmental Viability from SETENA is obtained, the Municipal permit for the development of the proposed activity will be processed.




## 2.3 Location map – Surroundings and property

**LOCATION MAP**  
Compañía Palma Tica S.A.  
Atlantic Division  
Scale: 1: 75 000



### Symbology

#### Roads

-  Local
-  Undefined
-  Study area

### Location Diagram



### Credits:

-Data provided.  
-Topographic sheet:  
Chirripó Atlantic/Sucio River 1: 50 000

Projection: Lambert North C.R.,  
Lambert Conformal Conic.  
Datum: Clarke 1866.

Created by: Geologist Luis Campos C.

Date: December 2012

## 2.4 Area for the new plantations and timetable for the new plantations

The following is a chart containing the details of the areas to be planted:

| Farm         | Farm's area      | Area to be planted |
|--------------|------------------|--------------------|
| Reifa        | 770,02ha         | 560ha              |
| Chirripósito | 124,22ha         | 110ha              |
| El Bambú     | 589,41ha         | 343ha              |
| Pajarera     | 635,12ha         | 600ha              |
| <b>Total</b> | <b>2118,77ha</b> | <b>1613ha</b>      |

The following chart shows the production timetable proposed:

| Productivity curves | Calendar year | Metric tons of fruit/Ha |
|---------------------|---------------|-------------------------|
| Year 0              | 2013          | 0                       |
| Year 1              | 2014          | 0                       |
| Year 2              | 2015          | 6,59                    |
| Year 3              | 2016          | 14,09                   |
| Year 4              | 2017          | 25,00                   |
| Year 5              | 2018          | 26,17                   |
| Year 6              | 2019          | 27,74                   |
| Year 7              | 2020          | 28,55                   |
| Year 8              | 2021          | 29,01                   |
| Year 9              | 2022          | 27,93                   |
| Year 10             | 2023          | 28,49                   |
| Year 11             | 2024          | 30,34                   |
| Year 12             | 2025          | 32,60                   |
| Year 13             | 2026          | 31,10                   |
| Year 14             | 2027          | 31,44                   |
| Year 15             | 2028          | 28,29                   |
| Year 16             | 2029          | 28,21                   |
| Year 17             | 2030          | 28,39                   |
| Year 18             | 2031          | 28,19                   |
| Year 19             | 2032          | 27,41                   |
| Year 20             | 2033          | 25,69                   |
| Year 21             | 2034          | 24,59                   |
| Year 22             | 2035          | 24,33                   |
| Year 23             | 2036          | 23,98                   |
| Year 24             | 2037          | 22,73                   |

| Productivity curves | Calendar year | Metric tons of fruit/Ha |
|---------------------|---------------|-------------------------|
| Year 25             | 2038          | 21,25                   |

### 3. SEIA and HCVA Management and the staff for implementation

#### 3.1 Organizational information and contacts

|                                        |                                                    |
|----------------------------------------|----------------------------------------------------|
| <b>Name of the Company</b>             | Compañía Palma Tica S.A                            |
| <b>Corporate Identification Number</b> | 3-101-173999                                       |
| <b>Legal Representative</b>            | Erwin Martin Holmann Pastora                       |
| <b>Identification Number</b>           | R-155808421015                                     |
| <b>Telephone</b>                       | 2284-1000                                          |
| <b>Fax</b>                             | 2221-6371 / 2221-7340                              |
| <b>Email</b>                           | <a href="mailto:info@numar.net">info@numar.net</a> |
| <b>Company's Environmental Manager</b> | Carlos Playa Cruz                                  |
| <b>Identification Number</b>           | 6-0308-0889                                        |
| <b>Telephone</b>                       | 2777-8125                                          |
| <b>Fax</b>                             | 2777-0311                                          |
| <b>Email</b>                           | caplaya@numar.net                                  |

#### 3.2 Staff involved in planning and execution

The staff in charge of planning and execution for the proposed Management Plans are presented below, in hierarchy:

➤ Executive Management for Compañía Palma Tica S.A.

- General Manager
- Environmental Manager
- Occupational Health Professional
- Production Engineers
- Workers

Also, the environmental regent, assigned by Compañía Palma Tica S.A., intervenes in this case, with is a legal requisite pursuant to the dispositions issued by the National Environmental Technical Secretariat (SETENA). He will be responsible for ensuring that Compañía Palma Tica S.A., duly complies with the environmental commitments acquired with the government for the development of the Project.



Lastly, the institutions with jurisdiction on this matter must be included, as well as those in charge of supervising that Compañía Palma Tica S.A. act in accordance with the current legislation regarding environmental, occupation and social matters. The following are among these institutions:

- Municipality
- SETENA
- MNAET
- SINAC
- Ministry of Health
- Ministry of Agriculture and Livestock (MAG)

**3.3 Community leaders to be involved:**

- Community Welfare Association in Sota 2.
- Community Welfare Association in Barbados.

**4. Summary of Management and Mitigation Plans (SEIA)**

**4.1 Mitigation plan for minimizing negative social and economic impacts**

| Impacting Action                                                                                                                                                                                           | Impact generated                                                                             | Mitigation Measures                                                                                                                                                                                                        | Phase                                                                       | Responsible Party                                                                                                                       | Timeframe                                                                           |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|
| Site preparation for planting of new plantations:<br>- Presence and movement of heavy machinery<br>- Elimination of coverage<br>- Leveling the land<br>- Creation of drainages<br>- Mobilization of debris | - Change in the landscape of farms<br>- Change and/or replacement agro-production activities | - Comply with the national regulations regarding working hours and conditions<br>- Comply with the regulations regarding transit of heavy machinery (use of tarps)<br>- Comply with the national regulations regarding the | - Preparation of the land for crops in the new African Oil Palm plantations | - Compañía Palma Tica S.A.<br>- Producers<br>- Environmental manager or regent<br>- MAG, MINSA, INDER, MTSS, and other regional offices | - During the entire site preparation phase for the new African Oil Palm plantations |

| Impacting Action                                                                                                                                                                                                                                                                 | Impact generated                                                                                                                                   | Mitigation Measures                                                                                                                                                                                                                                                                                                                | Phase                                       | Responsible Party                                                                                                                                                                                           | Timeframe                                                                           |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                                                                  |                                                                                                                                                    | <ul style="list-style-type: none"> <li>protection of archeological resources</li> <li>- Observe the farm's border with regards to the rural settlements in the area</li> </ul>                                                                                                                                                     |                                             |                                                                                                                                                                                                             |                                                                                     |
| Planting process for the new plantations: <ul style="list-style-type: none"> <li>- Consolidation of greenhouses</li> <li>- Planting new African Oil Palm plants</li> <li>- Use of various agro-chemicals traditionally used in agricultural and livestock in the area</li> </ul> | <ul style="list-style-type: none"> <li>- Change in the farm's landscape</li> <li>- Change and/or replacement agro-production activities</li> </ul> | <ul style="list-style-type: none"> <li>- Comply with the national regulations regarding working hours and conditions</li> <li>- Comply with the national legislation regarding handling of hazardous substances (agro-chemicals)</li> <li>- Observe the farm's border with regards to the rural settlements in the area</li> </ul> | - Planting new African Oil Palm plantations | <ul style="list-style-type: none"> <li>- Compañía Palma Tica S.A.</li> <li>- Producers</li> <li>- Environmental manager or regent</li> <li>- MAG, MINSA, INDER, MTSS, and other regional offices</li> </ul> | - During the entire planting process phase for the new African Oil Palm plantations |

#### 4.2 Management plan for improvements in the social and economic contributions

| Possible positive impact                                                                   | Measures for maximizing the possible impact                                                                                                                                                                                   | Responsible parties                                                                                                                                                                                     |
|--------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Economic stability for the families that will participate in the new plantation activities | <ul style="list-style-type: none"> <li>- Comply with the provisions contained in the Master Plan for African Oil Palm Planting in Atlantic Huatar</li> <li>- Involve the people venturing into the cultivation and</li> </ul> | <ul style="list-style-type: none"> <li>- ASOPALMA</li> <li>- Compañía Palma Tica S.A.</li> <li>- Environmental manager or regent</li> <li>- MAG, MINSA, INDER, INA, MTSS, and other regional</li> </ul> |

| Possible positive impact                                                                           | Measures for maximizing the possible impact                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Responsible parties                                                                                                                                                                                                             |
|----------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                    | <p>harvesting of African Oil Palm in the existing agricultural value chain in the Atlantic Huetar Region</p> <ul style="list-style-type: none"> <li>- Conduct a training process including the different activities involved in the cultivation and/or harvesting of African Oil Palm, to ensure adequate participation in this activity from those involved.</li> <li>- Establish production contracts with those parties that will be involved in the activity, as independent producers.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                     | <p>offices</p>                                                                                                                                                                                                                  |
| <p>Generation of job opportunities for those individuals living in the surrounding communities</p> | <ul style="list-style-type: none"> <li>- Give priority of employment to people living in the communities located in the vicinity of the farms where the new plantations will be developed.</li> <li>- Comply with the provisions contained in Laws No. 2 (Work Code); No. 7142 (Equality Women's Act); No. 7476 (Law against Sexual Harassment in the Workplace and in Education), No. 7600 (Equal Opportunities for People with Disabilities Act).</li> <li>- Comply with the provisions regarding prohibition and/or limitations for child labor in agricultural activities.</li> <li>- Create, implement, and disclose an occupational health and safety plan, to raise awareness within the employees regarding the importance of using personal protection equipment in risk activities, as a mechanism for accident prevention.</li> <li>- Promote education and/or training in the local</li> </ul> | <ul style="list-style-type: none"> <li>- ASOPALMA</li> <li>- Compañía Palma Tica S.A.</li> <li>- Producers</li> <li>- Environmental manager or regent</li> <li>- MAG, MINSA, INDER, MTSS, and other regional offices</li> </ul> |

| Possible positive impact                                                                                         | Measures for maximizing the possible impact                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Responsible parties                                                                                                                                                                                                                   |
|------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                  | community to widen the scope of work opportunities and not limit them to agricultural crops, allowing the possibility of administrative positions within the African Oil Palm activity.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                       |
| Improvements in the communities located in the vicinity of the farms where the new plantations will be developed | <ul style="list-style-type: none"> <li>- Diagnose the organizational status of the communities located in the vicinity of the farms where the planting of the new African Oil Palm plantations will be developed, in order to define the linking mechanisms between the inhabitants and the developers.</li> <li>- Establish a protocol for contributions and assistance to the communities located in the farm's vicinity, to create a regulatory framework for the linking mechanisms between the inhabitants and the developers</li> <li>- Perform an assessment of the community needs for those located in the vicinity of the farms where the new plantations will be developed, to establish a contributions and/or assistance plan that is beneficial to the inhabitants, as well as for the developers</li> </ul> | <ul style="list-style-type: none"> <li>- ASOPALMA</li> <li>- Compañía Palma Tica S.A.</li> <li>- Producers</li> <li>- Environmental manager or regent</li> <li>- MAG, MINSA, INDER, MOPT, MTSS, and other regional offices</li> </ul> |

### 4.3 Mitigation plan for negative environmental effects

| Impacting Action | Environmental Measure                                                                                                                     | Application Timeframe                            | Responsible for implementation |
|------------------|-------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|--------------------------------|
| Soil removal     | <ul style="list-style-type: none"> <li>• The work will be stopped immediately if archeological materials are found; inform the</li> </ul> | <p>NA<br/>(This is to take place only in the</p> | The Company                    |

| Impacting Action                    | Environmental Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Application Timeframe             | Responsible for implementation |
|-------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|--------------------------------|
|                                     | <p>corresponding officer (or the National Museum of Costa Rica) and act according to his or her recommendations.</p> <ul style="list-style-type: none"> <li>• The material needing off-farm export, should be transported to a licensed disposal site, approved for these purposes.</li> <li>• Use the materials obtained from the canals that are made, according to their quality and feasibility, for filling the land, where necessary, within the farms.</li> <li>• All fill material must be compacted.</li> <li>• Soil mounds must be covered in plastic to avoid windborne particles, and to avoid erosion processes due to surface runoff.</li> </ul> | initial site preparation stage)   |                                |
| <b>Dust generation</b>              | <ul style="list-style-type: none"> <li>• Apply systematic irrigation to keep moist the bare soil lacking vegetation coverage during the initial phases of the project.</li> <li>• Use tanker trucks to keep moisture of roads during the dry season, in order to reduce the amount of dust generated.</li> <li>• If it is necessary to export materials from the farms, trucks must be covered with tarpaulins to avoid spreading dust particles.</li> </ul>                                                                                                                                                                                                   | D<br>(only during the dry season) | The Company                    |
| <b>Deterioration of air quality</b> | <ul style="list-style-type: none"> <li>• Ensure that the machinery used for the works is in good mechanical condition (does not generate excessive smoke).</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | D                                 | The Company                    |

| Impacting Action                      | Environmental Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Application Timeframe                                                | Responsible for implementation |
|---------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------|--------------------------------|
|                                       | <ul style="list-style-type: none"> <li>• Use only the equipment and machinery necessary with the highest degree of efficiency, in order to limit the sources of environmental impact as much as possible.</li> <li>• Comply with the current laws regarding noise levels (Refer to Decree No. 78718-S).</li> <li>• Hire trained personnel for the operation of machinery.</li> <li>• Implement a work schedule involving machinery that ensures the minimum noise disturbance possible (6am a 6pm).</li> </ul>                                                                                                                                                                                              |                                                                      |                                |
| <p><b>Surface water pollution</b></p> | <ul style="list-style-type: none"> <li>• Do not perform repairs in heavy machinery or vehicles within the farms.</li> <li>• Ensure that heavy machinery and vehicles are in optimal mechanical conditions, to avoid leaks or spills.</li> <li>• Have a containment plan for fuel spills, to avoid any type of pollution.</li> <li>• Store solid wastes in a location for that purpose, for due treatment and remove them from the farm on a daily basis.</li> <li>• Protect soil from erosion, through correct storm water management techniques (placing bags in the runoff canals to decrease speed), in order to avoid runoff of materials towards bodies of water associated with the farms.</li> </ul> | <p>D and Q (in the event of maintenance to canals and drainages)</p> | <p>The Company</p>             |

| Impacting Action                                   | Environmental Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Application Timeframe | Responsible for implementation |
|----------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|--------------------------------|
|                                                    | <ul style="list-style-type: none"> <li>• Do not discharge untreated solid or liquid waste into bodies of water.</li> <li>• Provide periodical maintenance to the rain water drainage network in the farms, performing inspections aimed at identifying the presence of obstructions and to remove accumulation of sediment.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                 |                       |                                |
| <p><b>Soil and underground water pollution</b></p> | <ul style="list-style-type: none"> <li>• This section reiterates the measures described in the previous section, except those relating to the maintenance canals and drains.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <p>D</p>              | <p>The Company</p>             |
| <p><b>Generation of solid waste</b></p>            | <ul style="list-style-type: none"> <li>• Set up a waste collection area within one of the farms and classify according to type.</li> <li>• Have enough waste containers for the volume of waste generated, to maintain adequate sanitary conditions. The waste containers must have a lid, be equipped with plastic bags and must be cleaned periodically.</li> <li>• Give weekly maintenance to the waste containers installed in each farm, to avoid bad smells.</li> <li>• Collect waste periodically, with proper sanitary final disposal, in a location authorized by the Ministry of Health.</li> <li>• Farms must be in orderly and clean conditions.</li> <li>• Establish waste management systems to minimize waste generation as much as possible</li> </ul> | <p>D, S and M</p>     | <p>The Company</p>             |

| Impacting Action                                             | Environmental Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Application Timeframe                               | Responsible for implementation |
|--------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------|--------------------------------|
|                                                              | <p>(recycling), implementing a basic classification system and waste utilization.</p> <ul style="list-style-type: none"> <li>• Also, where applicable, waste must be returned to the suppliers, such as product containers used for applications and others.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                     |                                |
| <p><b>Potential effect on the biological environment</b></p> | <ul style="list-style-type: none"> <li>• Prior to cutting down any forest species, Article 20 of the Forestry Law No. 7575 must be observed, as well as Articles 14 and 16 of the Forestry Law regulations, Executive Decree No. 25721-MINAE.</li> <li>• Notify MINAET of the presence of endangered flora or fauna species, if found during the project's development.</li> <li>• If possible burrows, shelters or nests of any species are identified, coordinate with specialists and MINAET for relocation.</li> <li>• Ensure no impact on the forest coverage or the water protection zones associated with each of the farms.</li> <li>• Keep strict erosion and sedimentation control practices, mainly regarding surface runoff draining towards the bodies of water associated with the farms.</li> <li>• Promote vegetation recovery plans in the associated water protection zones, in full coordination with MINAET.</li> </ul> | <p>NA and SE (in the event of water monitoring)</p> | <p>The Company</p>             |



| Impacting Action                        | Environmental Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Application Timeframe                                    | Responsible for implementation |
|-----------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------|--------------------------------|
|                                         | <ul style="list-style-type: none"> <li>• Monitor the physical and chemical conditions in the associated bodies of water, twice a year.</li> <li>• Take samples from the bodies of water for benthic macro-invertebrates (biological indicators), twice a year.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                          |                                |
| <p><b>Occupational safety risks</b></p> | <ul style="list-style-type: none"> <li>• The Company commits to ensuring the physical, mental and social wellbeing of all the workers, by hiring the services of an Occupational Health professional, and to comply with the guidelines set forth in the Occupational Health Policies.</li> <li>• Comply with the regulations and technical guidelines set forth by the authorities, with regards to Occupational Health and Safety.</li> <li>• Establish an Occupational Health and Safety Program, pursuant to the current legislation, adapted to the conditions of the site where the works will be developed. This program must be known by the project's workforce.</li> <li>• Define the guidelines and safety measures that must be applied by workers for their personal safety.</li> <li>• Place the safety sheets and use manual for dangerous products in the corresponding warehouses, to ensure availability to the employees. This must comply with the current legislation.</li> </ul> | <p>NA and D (when using PPE and guidance compliance)</p> | <p>The Company</p>             |

| Impacting Action                            | Environmental Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Application Timeframe                                | Responsible for implementation |
|---------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|--------------------------------|
|                                             | <ul style="list-style-type: none"> <li>• Provide employees with initial and ongoing training on health and safety matters.</li> <li>• Limit access to the Plantation to authorized personnel only.</li> <li>• Create policies for the use of personal protection equipment (PPE) and train employees in the correct use of said equipment.</li> <li>• Make the use of PPE mandatory for all employees, according to the tasks performed.</li> <li>• Provide insurance coverage for the employees with an Occupation Risk Insurance Policy from the National Insurance Institute (INS).</li> <li>• Issue warnings to those employees not complying with the safety guidelines set forth for the project.</li> </ul> |                                                      |                                |
| <b>Vehicular traffic</b>                    | <ul style="list-style-type: none"> <li>• Post signs that warn drivers and pedestrians about heavy machinery and vehicles exiting and entering the farms.</li> <li>• Observe the maximum speed for heavy machinery and vehicles of 25 km/h.</li> <li>• Provide periodic maintenance to the road sections that are damaged by the transit of heavy machinery and vehicles.</li> </ul>                                                                                                                                                                                                                                                                                                                                | NA and D (with regards to the maximum allowed speed) | The Company                    |
| <b>Replacement of production activities</b> | <ul style="list-style-type: none"> <li>• Fully comply with the national regulations regarding work schedules and conditions.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | D                                                    | The Company                    |

| Impacting Action                     | Environmental Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Application Timeframe | Responsible for implementation |
|--------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|--------------------------------|
|                                      | <ul style="list-style-type: none"> <li>• Respect the land borders with the rural settlements in the area.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                  |                       |                                |
| <p><b>Changes in the scenery</b></p> | <ul style="list-style-type: none"> <li>• Prior to cutting down any forest species, Article 20 of the Forestry Law No. 7575 must be observed, as well as Articles 14 and 16 of the Forestry Law regulations, Executive Decree No. 25721-MINAE.</li> <li>• Ensure no impact on the forest coverage or the water protection zones associated with each of the farms.</li> <li>• Promote vegetation recovery plans in the associated water protection zones, in full coordination with MINAET.</li> </ul> | <p>NA</p>             | <p>The Company</p>             |

NA: Does not apply, D: Daily, W: Weekly, Q: Quarter, SE: Semester

#### 4.4 Management plan for promoting positive environmental effects

For this section, no positive environmental effects were identified as such. However, compliance of the proposed management plan detailed in the preceding section will automatically generate positive environmental effects, since this plan seeks to protect and promote all ecosystems with conservation potential, such as bodies of water, river bank vegetation, isolated forests, among other things.

## 5. Summary of the Management and Mitigation Plans (HCVA)

### 5.1 HCVA monitoring plan and periodic date review

It is important to establish within this section that neither of the 4 farms included in the study were identified as HCVA. Nonetheless, some High Conversation Values were detected (HCV), which although by themselves do not turn the farms into HCVA, they do present variables that must considered for their conservation.

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Therefore, a monitoring plan was not prepared as such. However, a series of management and monitoring recommendations are detailed below, in order to establish sustainable management mechanisms for these identified HCV.

**General actions:**

- Establish contact with local institutions, non government and government agencies, in order to promote conservation and management policies and actions to be executed.
- Take a firm position regarding the policies and actions that will be executed by the Company regarding environmental matters and inform the surrounding communities.
- Identify social and cultural behaviors that may affect the HCA and formulate solutions.
- Identify internal Company problem issues regarding future plantations that could affect the HCA
- Identify local and regional problem issues regarding affectation of these areas.
- Know the position of the farm's neighboring owners with regards to future management and conservation plans for these areas.
- Monitor the ecosystem's dynamics and behavior, with regards to the general landscape (increase or decrease in the forest areas).
- Elaborate a management plan for the plantations, including the environmental affectation.
- Identify in the landscape the potential of connecting areas with the forest that could favor the creation of biological corridors.
- Perform a survey on those areas that are considered protection zones for bodies of water that could be experiencing an invasion and take the proper corrective actions.

**Specific actions:**

- Evaluate the threatened or endangered wildlife species that use or pass through the farms, in order to determine their population status.
- Determine the use of this farms as transit and travel ways towards more established forests, by identified wildlife species.

**5.2 Management and mitigation plan for HCA potential threats**

As mentioned on the previous section, no HCVA were located in the 4 farms in the study, yet some HCA were identified. With the purpose of preserving said HCA's, the following chart details the environmental measures that must be observed:

| Objective                                                                                                                 | Environmental Impact                                                                           | Environmental Measure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Application Timeframe                                                                                                                                                | Responsible Party  |
|---------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|
| <p>Ensure respect and maintenance of all bodies of water and forest coverage present in the farms and influence areas</p> | <p>Potential affection on the biological environment (forest coverage and bodies of water)</p> | <ul style="list-style-type: none"> <li>• Prior to cutting down any forest species, Article 20 of the Forestry Law No. 7575 must be observed, as well as Articles 14 and 16 of the Forestry Law regulations, Executive Decree No. 25721-MINAE.</li> <li>• Notify MINAET of the presence of endangered flora or fauna species, if found during the project's development.</li> <li>• If possible burrows, shelters or nests of any species are identified, coordinate with specialists and MINAET for relocation.</li> <li>• Ensure no impact on the forest coverage or the water protection zones associated with each of the farms.</li> <li>• Keep strict erosion and sedimentation control practices, mainly regarding surface runoff draining towards the bodies of water associated with the farms.</li> <li>• Promote vegetation recovery plans in the</li> </ul> | <p>Periodical application. However, constant alert should be in place with regards to these measures. For water monitoring, periodicity shall be every semester.</p> | <p>La Compañía</p> |

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|  |  | <p>associated water protection zones, in full coordination with MINAET.</p> <ul style="list-style-type: none"> <li>• Monitor the physical and chemical conditions in the associated bodies of water, twice a year.</li> <li>• Take samples from the bodies of water for benthic macro-invertebrates (biological indicators), twice a year.</li> </ul> |  |  |
|--|--|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|

### **5.3 Management plans for improving and/or maintaining conversation values in the HCVA**

As has been mentioned before, no HCVA were located in the study areas. However, the chart above details the proposed measures that seek to improve and/or maintain some HCA's identified.

## **6. Internal Responsibility**

### **6.1 Formal waiver for the implementation of management and mitigation plans**

Bio Terra Consultores Ambientales, an RSPO accredited company specializing in the environmental field and RSPO fully assumes responsibility for the studies summarized on this public notification reports, with regards to the content of said reports.

Notwithstanding the above, responsibility over the implementation of the proposed management and mitigation plans contained herein is formally and officially waived.

Nothing further, receive my regards,



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