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RSPO NOTIFICATION OF PROPOSED NEW PLANTING

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

Date of notification: October 26, 2014

Tick whichever is appropriate

<input type="checkbox"/>	This is a completely new development and stakeholders may submit comments
<input checked="" type="checkbox"/>	This is part of an ongoing planting and is meant for notifications only

Company: Ghana Oil Palm Development Company Limited

Subsidiary: SIAT S.A

RSPO Membership No.: 1-0005-04-000-00

Location of Proposed New Planting: Kwae, Kwaebibirem District, Eastern Region, Ghana

GPS Reference:

Part of Okumaning estate : 06° 01' 41.73" - 06° 05' 29.33" North and 00° 53' 54.11" - 00° 57' 08.40" West (± 1,888.55 Ha) and 06° 04' 02.72" - 06° 05' 21.84" North and 00° 52' 58.70" - 00° 54' 10.88" West (± 352.00 Ha).

RSPO New Planting Procedure Assessment Report Ghana Oil Palm Development Company Ltd – Eastern Region, Ghana



Location of the Proposed New Planting

Ghana Oil Palm Development Company Ltd (GOPDC Ltd), a subsidiary of SIAT S.A, is developing approximately **2,240.55 ha** (51% of the total Okumaning estate). Location of proposed new planting at Okumaning estate - Kwae, Kwaebibirem District, Eastern Region, Ghana. GOPDC Ltd has two estates i.e Okumaning estate and Kwae estate. Kwae estate was planted in 1970s and 1980s and is therefore not subject to the new planting procedure.

GOPDC Ltd has obtained lease agreement issued by the Government of Ghana with register number 2538/2008 on December 15, 2008 covering an area of \pm 12,540 acre / 5,074.76 Ha for Okumaning estate but it takes retrospective effect from 1st January 2000. Okumaning estate encompassing all that parcels of land belonging to Okumaning, Takorowase and Kusi stools. GOPDC, formerly a state owned enterprise (State Oil Palm Company Ltd) had a majority (80%) of the company. In year 1995, the company was divested under the government of Ghana divestiture implementation programme (PNDC Law 326). SIAT (Ghana) Ltd, a subsidiary of SIAT group of companies acquired this majority share with the government of Ghana holding the remaining 20% until 2009 when SIAT (Ghana) Ltd purchased the remaining 20% of government shares to make GOPDC a 100% privately owned company.

Land use classification in the GOPDC Ltd are The GOPDC estates are located within the High Forest Zone (HFZ) of Ghana, Okumaning estate is characterized by oil palm, citrus and cocoa plantations, food crop farms and fallow farmlands with patches of forests and settlements (based on EIA report and satellite imagery) and indicated that oil palm, citrus and cocoa plantation (based on SIA assessment).

The annual rainfall in the region ranges from 840.1 to 2,121.2 mm with an average rainfall of 1,380 mm. The topography is gently undulating with gentle slopes which are generally less than 10% with an altitude of 120 to 168 m above sea level. Type of soil in GOPDC areas are Bekwai, Nzema, Kokofu, Timang and Oda where those type of soil compound association with varying degrees of properties.

A comprehensive and participatory independent Social and Environmental Impact Assessment (SEIA) and High Conservation Value (HCV) Assessment which include internal and external stakeholders were completed by RSPO approved assessor from ProForest Ltd. The results are incorporated into the operational management planning to develop the new planting. The Independent assessment by RSPO approved assessors results are (Okumanig estate):

- HCV 4.1 : Subinsa river in Okumaning estate, Kwae estate (Bobri river)
- HCV 6: Bunukeseeso shrine and Aboabo river in Okumaning estate. Kwae estate - Bobri /Nsoineso shrine, Apaam shrine, Adideku shrine/ Abena river.

**RSPO New Planting Procedure Assessment Report
Ghana Oil Palm Development Company Ltd – Eastern
Region, Ghana**



After the HCV assessment the total HCV area which needs to be set aside and monitored is 197.771ha. Per estate the specific hectare can be found below:

Total hectare for Kwae: 119.431ha

Total hectare for Okumaning: 78.34ha

	Kwae		Okumaning	
	HCV specification	ha	HCV specification	ha
HVC				
4	Bufferzone Bobri	41.58	Bufferzone Subinsa	34.56
4	Bufferzone Abena	22.51		
6	Labadi Shrine	0.911	Bunukesieso Shrine	4.85
6	Atobriso Shrine	2.03	Ntonmu Sacred Site Cemetery	4
6	Apaam Shrine	41.64	Aboabo River	34.93
6	Nsonieso Shrine	1		
6	Bobri Shrine	2.21		
6	Kwae Cemetery	4.65		
6	Anweam Cemetery	2.9		
Total		119.431		78.34

Location maps were prepared and presented in the SEIA and HCV assessment report to include all the above findings and recommendation from the assessor. Location maps showing the NPP location and HCV are in the attached figure below. The SEIA and HCV summary report includes additional maps showing the topography, landscape, and HCV areas (include BDPs). HCV maps prepared to include area for buffer and riparian reserve.

Location maps- both at landscape and property levels

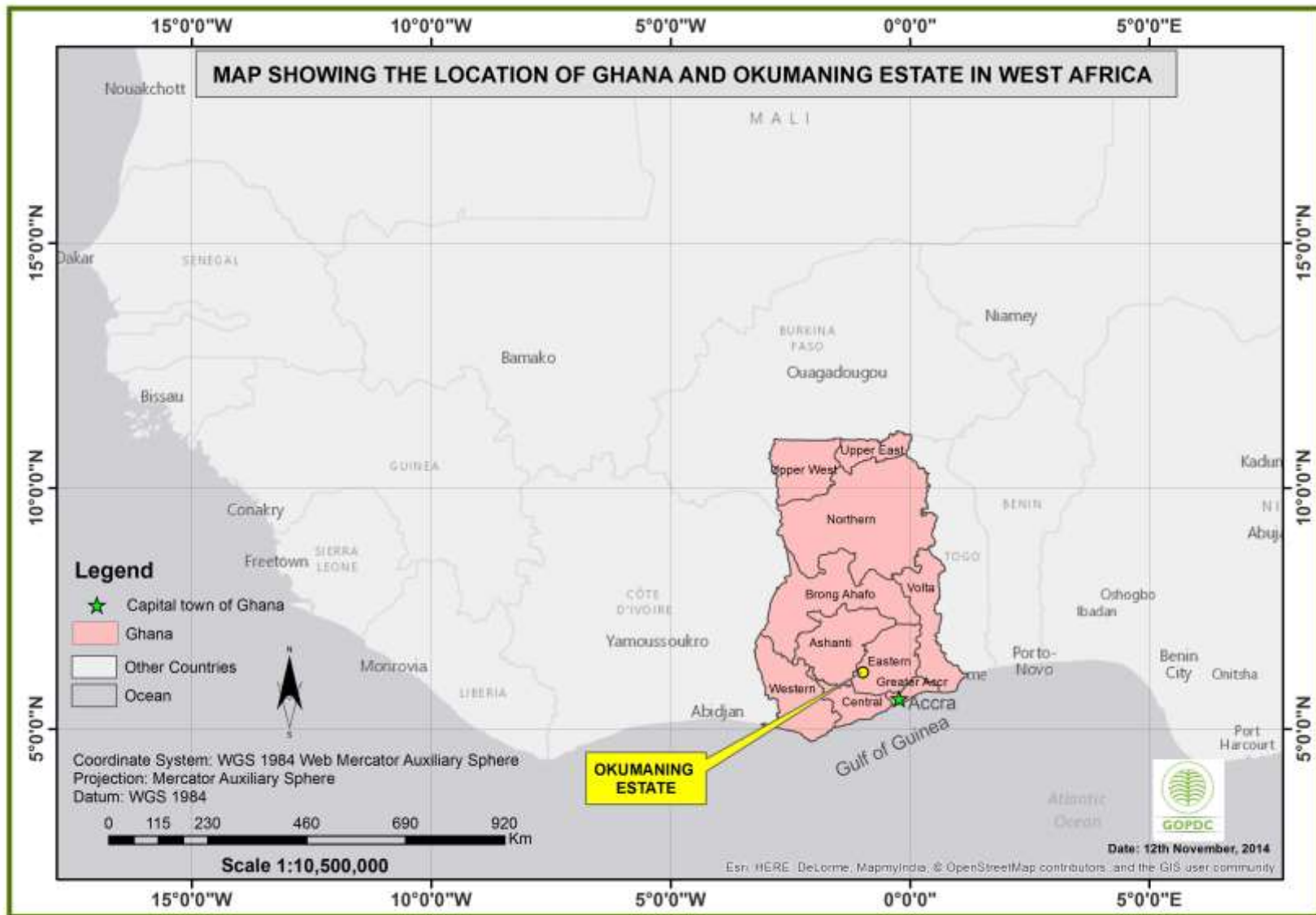


Figure 1: Map showing the location of Ghana and Okumaning Estate in West Africa

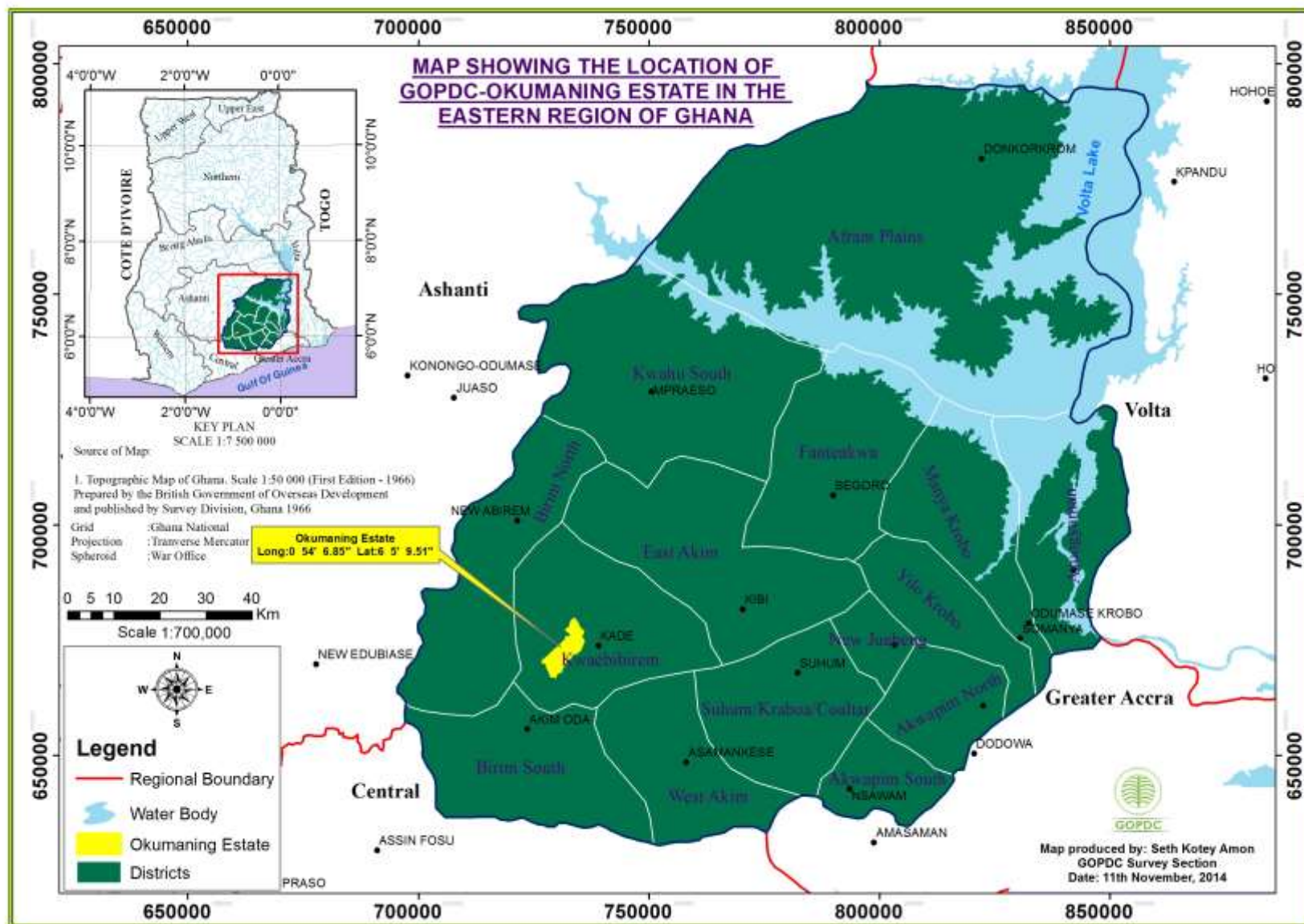


Figure 2: Map of GOPDC in the Ghana, Eastern Region, Kwaebibirim District

RSPO New Planting Procedure Assessment Report
Ghana Oil Palm Development Company Ltd – Eastern
Region, Ghana

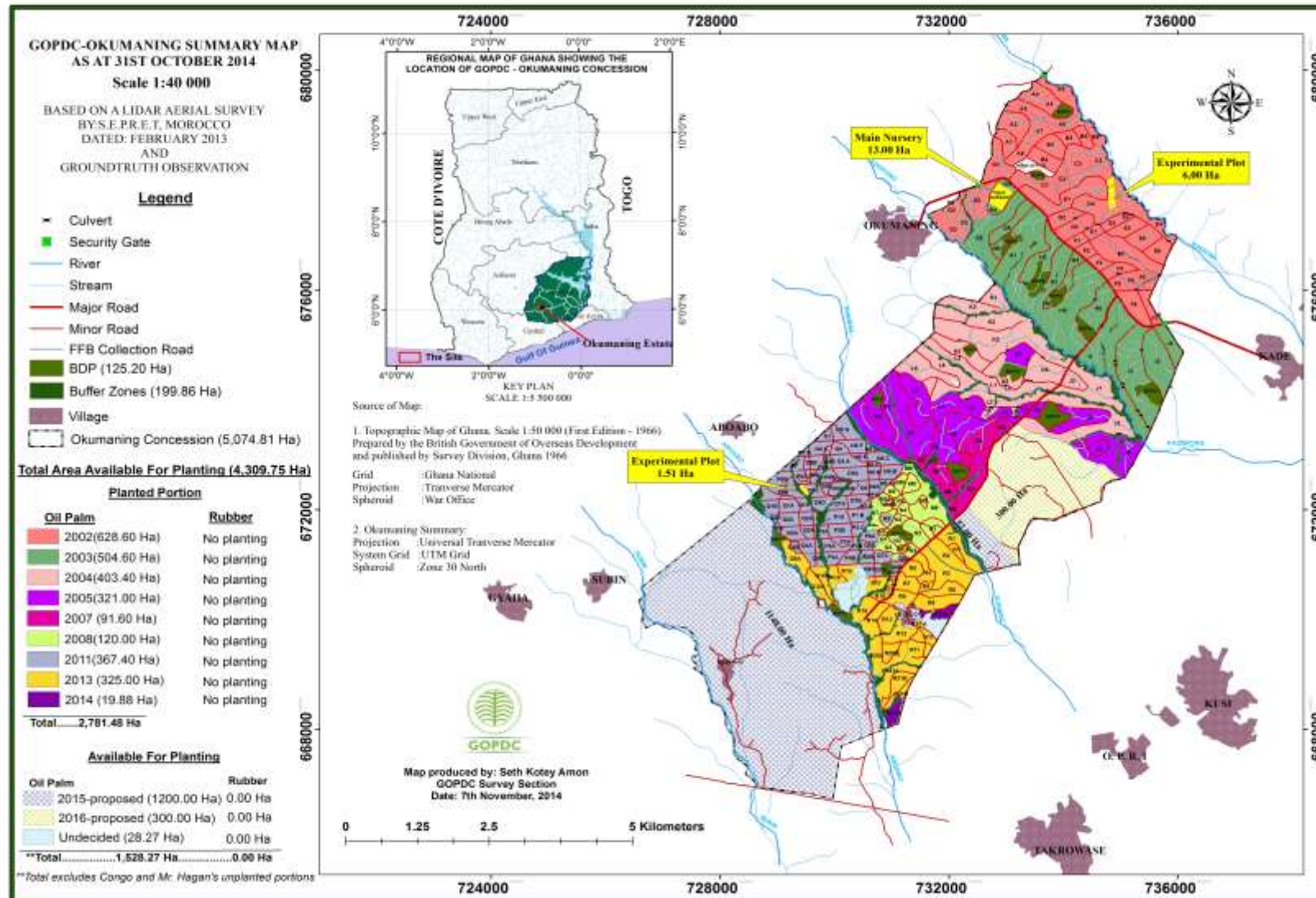


Figure 3: Summary Map of GOPDC – Okumanig Estate – Kwaebibir District, Eastern Region, Ghana

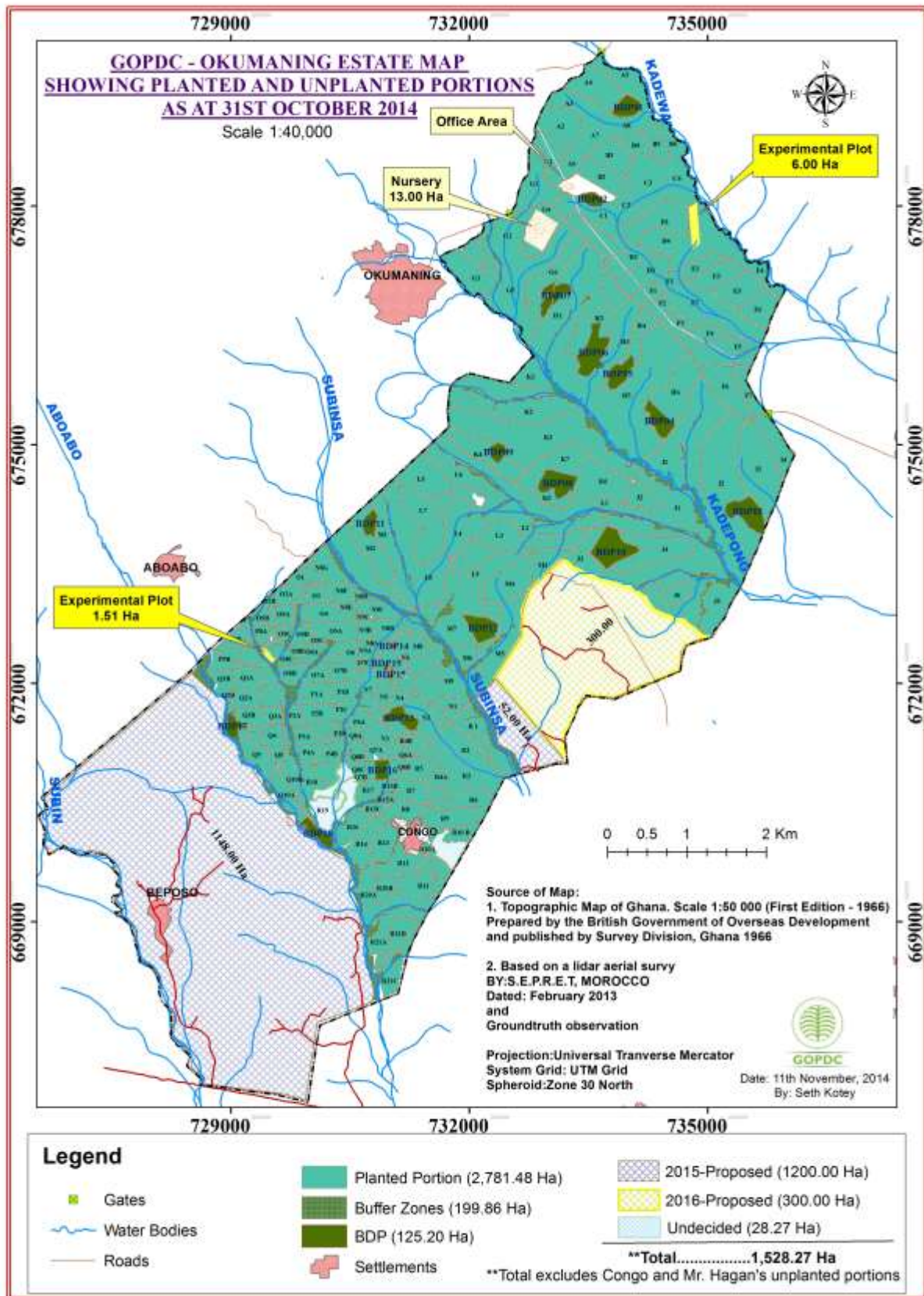


Figure 4: Summary Map of GOPDC Okumaning Estate, Kwabibirem District - Eastern Region, Ghana, highlighting New Planting Areas

SUMMARY FROM SEI ASSESSMENTS :

The Social Impact Assessment for Ghana Oil Palm Development Company was carried out by an independent consultant from Proforest team, University of Cape Coast and Kwame Nkrumah University of Science and Technology; PMB L76, Legon Accra Ghana; telephone: +44 (0) 1865 243439; email: africa@proforest.net. The team consist of five (5) members, which have expertise and role in the assessment as follow:

Name	Expertise and role in the assessment
Nana Darko Cobbinah	Agricultural and forestry expert, team Leader
Abraham Baffoe	Environmental policy and socio-economic expert, team member
Elikplim Agbitor	Environmental expert, team member
Isaac Abban-Mensah	Agric and socio-cultural expert, team member
Kwame Boakye Agyeman	Social survey team member
Delali Kpetsigo	Social survey team member
Phyllis Nayram Dzakpasu	Social survey team member

Assessment Methods (Data sources, data collection, dates, program, and places visited)

The primary and secondary data required in the preparation of this study was collected from different sources which including from relevant government agencies as well as the GOPDC and supported by field data verification.

a. Review of data, laws and publications to gather baseline data

Secondary data from various sources, this data is needed to make the identification and analysis of social sustainability at GOPDC, including demographic data from the 2010 Population and Housing Census carried out in Ghana by the Ghana Statistical Service and the Medium-Term Development Plans of the Kwaebibirem and Denkyemba Districts of the Eastern Region. Other relevant legal requirements including the Ghana Labour laws were also reviewed alongside relevant planning and policy framework document such as the Oil Palm Development Master Plan and reports of studies carried out on GOPDC operations as well as the company's own policies.

b. District level stakeholder consultations

Two district level consultations were carried out in Kwaebibirem and Denkyemba Districts. The objective of the first consultation was to solicit their inputs and comments on the assessment. The second was to share the SIA finding with them for their inputs into appropriate recommendation. Institution consulted included the Denkyemba and Kwaebibirem District Assemblies, and the Kwaebibirem District Directorate of Education.

c. Field survey and community consultations

Primary data collection was conducted by survey method. The basic representation of socio-economic aspects, work areas, as well as patterns of interaction with the company which is focused on community perception, community dependence/interaction to forest, social-custom, land legality, and company impacts. The field survey was conducted during the period 11th to 18th March 2014.

d. Semi structured interviews

Semi structured interviews conducted with key person (key person interviews) with the purpose to obtain more detailed information and understanding in accordance with the field of expertise or authority of each key person. Therefore, the more appropriate selection method of respondents for key person interviews was by purposive sampling rather than random sampling

e. Focus group discussions (FGD)

**RSPO New Planting Procedure Assessment Report
Ghana Oil Palm Development Company Ltd – Eastern
Region, Ghana**



Focus group which is defined as the people in a village that are specialized in a particular activity. The focus group approach was mostly adopted for chiefs and elders of communities, outgrowers, smallholders, GOPDC Workers Union, and various categories of GOPDC staff.

f. Community meetings

The social impact assessment exercise involved the community in discussing and providing information related to culture and tradition, local economy, infrastructure, perceived positive and negative impact of the GOPDC, land, and concession negotiation.

A stakeholders' consultation of the HCV and SIA management plan involving the stakeholders from local communities, village heads, government agencies, local workers union, outgrowers, smallholders, GOPDC, Management team and RSPO accreditation assessors from Proforest was held at Kwae and Okumaning estate.

Date of consultation	Community/organisation consulted	Activity
11 th March, 2014	Chiefs and elders of Kwae and Anweam	Focus group discussion
12 th March, 2014	Chiefs and Elders of Okumaning, Takorowase, Kusi, Minta & Asuom. Households in Kwae & Anweam.	Focus group discussions. Household questionnaire survey.
13 th March, 2014	Chiefs and Elders of Okaikrom, Aboabo & Otumi. Okaikrom, Otumi, Aboabo & Congo communities. GOPDC staff/workers <ul style="list-style-type: none"> a. Senior Staff (Agric) b. Junior staff (Agric) c. Permanent and casual workers (Agric) d. Human Resource Manager e. Health and Safety Officer f. Mill Manager g. Mill workers h. Projects and Utilities Manager i. Local Workers Union (GAWU). Okumaning, Aboabo and Congo communities.	Focus group discussions. Community meetings. Focus group discussions Focus group discussions Focus group discussions Interview Interview Interview Focus group discussion Interview Focus group discussions. Household questionnaire survey.
14 th March, 2014	Outgrowers Kwaebibirem District Directorate of Education. Kwaebibirem District Assembly. Denkyembour District Assembly. Households in Takorowase & Kusi. GOPDC Outgrower Manager	Focus group discussion and questionnaire survey Interviews. Interviews and brainstorming session. Interviews and brainstorming session. Household questionnaire survey. Interview

**RSPO New Planting Procedure Assessment Report
Ghana Oil Palm Development Company Ltd – Eastern
Region, Ghana**



Date of consultation	Community/organisation consulted	Activity
	GOPDC Community Relations Officer	Interview
15 th March, 2014	Asuom/Asuom-Minta, Atobriso, Okaikrom communities. Chiefs & elders; and womens' group in Atobriso. Womens' groups in Asuom and Minta	Household questionnaire surveys. Focus group discussions. Focus group discussions.
16 th March, 2014	Households in Asuom and Minta	Additional household questionnaire
17 th March, 2014	Smallholders. GOPDC's Kwae estates manager GOPDC's Okumaning estates manager GOPDC's Okumaning nursery workers	Focus group discussion and questionnaire survey. Interview Interview Focus group discussions.
29 th May, 2014	Representatives of communities around Okumaning estate (Okumaning, Takorowase, Kusi, Congo, Aboabo)	Public consultation
30 th May, 2014	Representatives of communities around Kwae estate (Kwae, Anweam, Asuom, Minta, Atobriso, Otumi, Okaikrom)	Public consultation

Summary of assessment findings for SIA assessments

The findings from Social Impact Assessment identify both positive and negative impacts from the operational activities of GOPDC. The positive impacts of the activities identified are as follows: uplift of the local people's financial income, opening of more job opportunities and development of the local community and area. The negative impacts that might occur are potential impacts on local social structures, land scarcity, water and air pollution, public infrastructure damage and displacement of people.

The Social Impact Assessment result by Proforest stated that, in general, the existence of GOPDC has a significant social impact to the basic requirement to the social sustainability of local community. The result of positive and negative social impacts identification that occur on the identified parties such as:

Impact area	Groups impacted	Significance of impact (No mitigation)	Significance of impact (With mitigation)
Employment creation and business opportunities (ready market for oil palm)	<ul style="list-style-type: none"> • GOPDC workers • Outgrowers • Scheme smallholders • Independent • Smallholders • Local communities 	High (Positive impact)	High (Positive impact)
Increased revenue	<ul style="list-style-type: none"> • Host communities • The Akyem Abuakwa Traditional Area • District Assemblies • Central Government 	High (Positive impact)	High (Positive impact)

RSPO New Planting Procedure Assessment Report
Ghana Oil Palm Development Company Ltd – Eastern
Region, Ghana



Impact area	Groups impacted	Significance of impact (No mitigation)	Significance of impact (With mitigation)
Contribution to education and healthcare	<ul style="list-style-type: none"> • Host and neighbouring communities • GOPDC workers and their families 	High (Positive impact)	High (Positive impact)
Contribution to poverty reduction	<ul style="list-style-type: none"> • Host and neighboring communities • Outgrowers • Smallholders • GOPDC workers 	High (Positive impact)	High (Positive impact)
Training and capacity building for sustainable oil palm production	<ul style="list-style-type: none"> • Scheme smallholders • Outgrowers • Independent smallholders 	High (Positive impact)	High (Positive impact)
Contribution to rural infrastructural development (water, sanitation, communication)	<ul style="list-style-type: none"> • Host communities • GOPDC staff living in the local communities 	High (Positive impact)	High (Positive impact)
Support for customs and traditions	<ul style="list-style-type: none"> • Host communities 	High (Positive impact)	High (Positive impact)
Presence of plantation workers and potential impacts on local social structures	<ul style="list-style-type: none"> • Local communities 	High (Negative impact)	Low (Negative impact)
Potential risk of anti-social behavior due to influx of migrant workers	<ul style="list-style-type: none"> • Local communities 	High (Negative impact)	Low (Negative impact)
Land scarcity, food insufficiency and high cost of food	<ul style="list-style-type: none"> • Host communities • GOPDC workers 	Medium (Negative impact)	Low (Negative impact)
Water and air pollution	<ul style="list-style-type: none"> • Local communities • GOPDC workers 	High (Negative impact)	Low (Negative impact)
Exposure to health and safety risks	<ul style="list-style-type: none"> • Local communities • GOPDC workers 	High (Negative impact)	Low (Negative impact)
Damage to infrastructure (e.g. roads)	<ul style="list-style-type: none"> • Local communities 	Low (Negative impact)	Low (Negative impact)
Displacement of people	<ul style="list-style-type: none"> • Host communities • Squatter communities • Squatter farmers 	High (Negative impact)	Medium (Negative impact)

The outcome of the community consultations indicated that, generally, the host communities have a

RSPO New Planting Procedure Assessment Report
Ghana Oil Palm Development Company Ltd – Eastern
Region, Ghana



cordial relationship with GOPDC and have not reported any major conflicts although they do occasionally have issues with the way GOPDC handles issues. GOPDC has not been in contravention of any traditional laws and values in its operational area; the communities commend the company for respecting their traditions, taboos and values. Some of the communities have sacred areas and other areas of cultural significance within GOPDC's concessions to which the company grants unhindered access to the communities.

GOPDC is aware about the FPIC and transparency in relation to dealings with customary landowners. SIA result shows there are some of land issues that the communities have with GOPDC which are pending. These include:

- Congo: Congo is a squatter community within GOPDC's Okumaning concession. The community has been issued eviction notice because of GOPDC's intentions to plant in the area. Valuation of crops and property was undertaken in 2005. The payment of compensation however delayed until 2009. The residents however rejected payment of the 2005 compensation package on the grounds that the value of their properties would have appreciated in 2009 when the compensation was planned to be paid. They therefore took the matter to court of which judgment is pending.
- Aboabo: the community lies on the fringes of GOPDC's Okumaning concession. Some members of the community have been farming on GOPDC's land. The company however intends planting on those parcels and has thus given the farmers an eviction notice. Valuation of crops and property has been completed but compensation yet to be paid.
- Takorowase: GOPDC started plantation development on the Takorowase land in 2013. Prior to commencement of planting, farmers who were on the land had their assets valued in 2005 and 2010 and compensation paid to them. Those whose assets were valued in 2013 are yet to receive compensation. Again, those who were compensated based on the 2005 and 2010 valuations were displeased with the compensation they received because of the time lapse between the valuation and the payment (devaluation) and have taken the matter to court. GOPDC has yet to undertake any developmental project in Takorowase; chiefs and elders were asked to bring a proposal which has not yet been submitted.
- Kusi: the community claims to have a 720 acre parcel of land within GOPDC's concession which is yet to be developed. The community is requesting GOPDC to reserve this parcel of land for residents to use as farm land since the community has given out all its remaining land to the Oil Palm Research Institute (OPRI) and Great Consolidated Diamond Ghana Limited. GOPDC, upon receipt of this request, reportedly advised the chiefs and elders of Kusi to refer the issue to the relevant government department so that government can refund GOPDC's land rent for that portion of the land and the requisite process followed to release the land to the community. This has not yet been done. GOPDC is thus holding back development of that parcel of land whilst continuing dialogue with the community.
- Beposo: Beposo is a settler community within GOPDC's concession on the Okumaning estate. GOPDC contracted a private valuer who undertook valuation of crops and other property in the concession. The private valuers report was submitted to the Technical Committee of the Lands Valuation Division (or the Lands Commission) for approval. The Technical Committee however announced new directives that valuation on all state divested lands should be carried out by the Lands Valuation Division, and could therefore not work with the private valuers report. Upon discussions between GOPDC and the Technical Committee, it was agreed that the Lands Valuation Division would undertake valuation of samples of areas valued by the private valuer to verify the accuracy of the private valuer's figures. GOPDC accordingly informed the Beposo community about the new developments. The community however objected to the verification exercise, expression fear that the verification exercise may result in reduction of the value of their properties.

Action taken by GOPDC are: 1) the company did not do any activity in the area that is being disputed;; 2) provide the community an opportunity to submit their objections related land issue; 3) waiting for a

court decision; 4) continuing to build good rapport through regular visits and social responsibility contribution.

- **Environmental Impact Assessment**

The main anticipation from Environmental Impact Assessment are:

Ecological Impacts

The site preparation activities covers an estimated area of 4,550 ha for the estate establishment. Site clearing for the plantation development including provision of roads may influence the habitat of a broad range of terrestrial flora and fauna. Increased sediment transport into streams will reduce stream channel, and also destroy the spawning and nestling grounds of fishes.

Soil Impacts

Soil Erosion: The removal of the protective vegetation cover will induce soil erosion. There is the potential of up-slope soils (Bekwai and Nzema) to be lost through erosion and therefore the risk classification of such exposed soil series is relatively high. About 24% of the concession is prone to high erosion risk.

Road construction

The total road layout will result in a surface occupation of about 3.9 km/100 ha. This means the development of about 5000 ha of land will encompass a total road network of 195km.

Soil Fertility

The soils are inherently low in fertility and, therefore may require the application of fertilizers.

Fertilizers applied on upland soils may be transported to streams thus affecting stream water quality.

Water impacts

Hydrological Regime: Vegetation removal during site preparation activities may temporarily alter the hydrological regime because of disturbance in the evapo-transpiration process. About 38% of the Kadepon, 27% of the Subinsa and 32% of the Aboabo catchments are within the concession.

Flooding

The Kadepon and the Aboabo Streams usually overflow their banks during the months of June and July. The removal of vegetation cover may result in an increased incidence of flood during the rainy period.

Water pollution due to soil erosion

Eroded soil or sediment deposited in waterways may increase the Total Suspended Solids (TSS) and turbidity of the receiving water bodies. Increased sediment deposition in the receiving streams may greatly reduce channel capacity.

Water pollution due to use of agro-chemicals

The estimated total areal nutrient inputs into the Aboabo, Subinsa and Kadepon Streams are calculated to be 1,025 kg/yr for phosphorus and 8,200 kg/yr for nitrogen in the ration 37%: 22% : 41% respectively for the three streams.

Water pollution due to domestic waste

**RSPO New Planting Procedure Assessment Report
Ghana Oil Palm Development Company Ltd – Eastern
Region, Ghana**



About 600 people will be employed for the site preparation activities and most of them will be maintained for the field maintenance aspects. Indiscriminate disposal of human wastes especially during site preparation activities by field workers may pollute nearby water bodies with fecal matter.

Impact on Groundwater Regime

Oil palm trees develop fibrous root system. These are usually shallow in depth barely exceeding 2m. Aquifer depth within the upper Birimian ranges from 4m to 59m. Groundwater quality may be threatened by nitrate pollution from fertilizer application.

Impacts on Air quality from burning

Standard practices at GOPDC do not permit burning of biomass and therefore this impact is eliminated.

Impact on Air quality from Traffic and Transportation

Traffic and transportation activities within, to and from Kwae may result in dust and noise pollution as well as addition to the existing traffic volume. Traffic to be associated with site reparation activities ranges from 2-4 motor cycles for field workers/supervisors, 6-9 transporting vehicles such as trucks and tractor-trailer combination and 4-6 four-wheel drives (mainly pickups).

Visual and Landscape Impacts: with the development of the project, the land cover is expected to be skewed towards oil palm (>55%) against cocoa and citrus. The project is expected to blend with the existing plantation landscape of the area.

Climate Change Impacts

The development of the oil palm plantation within the area will provide additional tree cover needed to reduce the damaging effect of storms associated with strong winds, which is a common event in the area. The impact on the local climate from vegetation clearing with large biomass generation is expected to be temporary. The re-vegetating of the cleared areas through the cultivation of oil palm is expected to restore and improve the local CO₂ concentration in the atmosphere through a much better tree (oil palm trees) cover.

The potential impacts and their sources from the project operational activities is presented in the table below :

Source of impacts	Medium to be affected/Effect of impacts
Oil Palm Nursery Development phase and Production of Seedlings	
Nursery site preparation, development and maintenance	Loss of vegetation Water pollution Soil erosion
Plantation Development Phase	
Plantation site preparation and construction of plantation internal roads	Displacement of people and villages in the permit area
	Loss of local population farmlands
	Water pollution due to surface runoff
	Destruction of immature crops
Use of agrochemicals (fertilizers, pesticides etc)	Soil erosion
	Run off into water bodies which may affect water quality and potentially make them unsafe for consumption
Working in high risk areas including chemical application, brushing etc	Pollution of water bodies which may impact on aquatic life forms
	Potential exposure to injuries such as cuts and snake bites
Influx of plantation workers	Risk of workers from chemical contaminations
	Health related risks such as HIV AIDS

**RSPO New Planting Procedure Assessment Report
Ghana Oil Palm Development Company Ltd – Eastern
Region, Ghana**



Source of impacts	Medium to be affected/Effect of impacts
	Potential impacts on native people's culture and tradition
Harvesting and transportation of FFB	
Harvesting of FFB	Risks from snake and other poisonous animals attack Potential injuries from sickle and falling fruits
Smoke, dust and particulate pollution from transportation of FFB to the mill	Air pollution
Emission of methane from ponds as a result of POME digestion	Air pollution Rivers and streams pollution
Discharge of untreated effluent	Rivers and streams pollution Air pollution from stench
Solid wastes from workers	Soil pollution Air pollution from decay and stench
Generalised Impacts	
Displacement of squatter communities	Displacement of squatter villages such as Aboabo and the inhabitants
Food security	Conversion of food crop lands to oil palm
Damage to public facilities and infrastructure	Potential damage to existing public roads, water etc due to increased use and pressure
Exposure to health risks	From pollution and exposure of local population to infectious diseases

SUMMARY FROM HCV ASSESSMENT :

The HCV assessment at GOPDC Ltd was carried out by a consultant from ProForest Ltd which is located in South Suite, Frewin Chambers, Frewin Court, Oxford OX1 3HZ, United Kingdom, Telephone/Fax : +44 (0) 1865 243439 / +44 (0) 1865 244820, email : info@proforest.net, website : www.proforest.net. The team members consist of consultants accredited and approved by the RSPO including:

- a. **Abraham Baffoe**. (Leader team and RSPO approved HCV assessor) is Natural Resources Management (Forestry) specialist and associate director of ProForest. He has a Master of Science (MS) in Forestry and Environmental Policy from the Louisiana State University, USA.
- b. **Remi Duval** (Member team and RSPO approved HCV assessor) is sustainable management of natural resources and biological survey and conservation planning. He worked in Gabon for a timber company where he was charge of the SFM.
- c. **Isaac Abban-Mensah** (Member team) is forester specializing in the socio-economics of tropical forestry. He has recently completed a master's degree at the University of Copenhagen.
- d. **Anni Vuohelaenen** (Member team) is GIS and mapping specialist.
- e. **Yaw Gyamfi** (Member team) is Social expert.
- f. **Thomas Takyi** (Member team) is Fauna survey expert.
- g. **Adjei Yeboah** (Member team) is Flora survey expert.

HCV Identifying Methods on the ground was carried out as follow:

The Ghana HCV toolkit was employed for HCV assessment conducted at GOPDC Ltd. The scope of the assessment of the presence of HCVs in the unplanted area of Okumaning estate (nucleus estate) and general Kwae estate. The assessment was also expanded into villages and other areas which are of considerable importance to the surrounding proposed plantation area. Process steps were used for HCV assessment are data and information collection and review, stakeholder consultation,

RSPO New Planting Procedure Assessment Report

Ghana Oil Palm Development Company Ltd – Eastern Region, Ghana



field visits to GOPDC operation, field verification at the unplanted areas in Okumaning and Kwae estate, community consultation. The fieldwork and primary data collection (including direct stakeholder consultation) was conducted on 15, 24-30 June 2010.

Summary of assessment findings (For HCV assessments)

In HCV report, GOPDC operations are located in one of these zones, the South-East subtype of the Moist Semi-Deciduous forest.

According to soil and land system maps of GOPDC attached on the HCV assessment and EIA document, there is no peat land present in all company's proposed new planting area.

HCV locations are distributed in all the company's locations. There are 2 categorized HCV in the company's location, i.e. HCV 4 and 6 with object are Subinsa river, Bunukeseeso shrine and Aboabo river in Okumaning estate. Whereas in Kwae estate are Bobri river, Bobri shrine, Apaam shrine, Adideku shrine/Abena river.

Total hectare for Kwae: 119ha

Total hectare for Okumaning: 79ha

The important element of HCV 4 especially HCV 4.1 are Bobri river and Subinsa river serve as a critical source of water supply for the townships Takorowase, Kusi and Kwae. Bobri River thus continues to serve as a critical source of water for household purposes by Kwae community and Takorowase community depends on pipe-borne water, whereas Kusi community is fully dependent on Subinsa river.

The important element for HCV 6 is the areas that have important function for local communities culture are archeological sites (protected or sacred object therefore they have ancestral heritage or historical value) and cultural rituals (the location and materials necessary to perform them). Type of HCV 6 in GOPDC areas are Taboo/sacred days on which entry to the bush is prohibited, sacred groves, fetish shrines, river deities, burial grounds and sacred tree. Sacred days are as follows: Okumaning township - Fridays and Kwae community - Tuesdays. Locations of sacred sites are Bunukeseeso along the Aboabo River in Okumaning and the abena sonieso along Abena river and nsonieso on Bobri river in Kwae estate. Three of such major river deities are Abena river and Bobri river in Kwae estate and Aboabo river in Okumaning estate. Fetish shrine such as Apaam shrine in Kwae estate which belongs to the people of Asuom community, and Adideku shrine at Bobriso (Kwae estate) which is connected to the Abena river.

The company has initiation to design the area as a Biodiversity Plot (BDP) dedicated to perpetual protection against all forms of logging, farming or hunting activities and have biodiversity of flora and fauna. In Okumaning estate has 20 BDP (125ha) and Kwae estate has 28 BDP (180ha). Moreover, the company has carried out buffer zone/riparian protection for rivers and streams. I

Current condition (based on verification in field) that the company has been committed protect of HCV areas as seen at block with year planting 2011-2014 which bordering with Aboabo river and Subinsa river. Whereas, guarantee from GOPDC that it will not conduct land clearing on HCV areas where appropriate with owned procedure relate of land clearing or land preparation.

Stakeholders' Consultation

The process of the HCV and SIA development and preparation of management plans and monitoring plans GOPDC involved consultation with the relevant stakeholders such as local community members, formal and informal community leaders and Government officials. A stakeholders' consultation of the HCV and SIA management plan took place involving the stakeholders from local community members, formal and informal community leaders, government officials. GOPDC Management team and RSPO accreditation assessors from ProForest was held at some location on

**RSPO New Planting Procedure Assessment Report
Ghana Oil Palm Development Company Ltd – Eastern
Region, Ghana**



15th June 2010 (Resource Management Support Centre of the Forestry Commission), 24th June 2010 (Ghana Wildlife Society), 26th June 2010 (chief and leader of Okumaning community), 27th June 2010 (Beposo settler community and Aboabo community), 28th June 2010 (Forestry Commission District Manager for Kade and chief and leader of Takrowase) and 29th June 2010 (Kwae community).

Issues raised by stakeholder in stakeholder consultation are the local population particularly the natives generally believe that the Okumaning expansion project will contribute to the socio-economic development of the area and therefore very much want the project to take off. This said, they together with the migrant farmers were concerned that the expansion project could impact negatively on available farmlands for food crop production and also their traditional conservation areas and other protected areas such as watersheds, riparian vegetation and sacred sites. They were also concerned about the delayed compensation for their immature crops and other properties. Additionally, they expressed concerns about the impact of pollution from POME and other agro-chemicals on water bodies especially the ones they depend on for their household water need such as the Aboabo River.

SUMMARY OF PLANS:

a. Summary of Management and Mitigation Plans (SEIA)

Social Impact Mitigation Plan:

Positive and negative impact that has been identified from the results of the Social Impact Assessment in 2014 including: employment, health and safety, employment rights and benefits, communication and consultation of workers, employment stability, business opportunities, local revenue, household income, institutional, perceptions on corporate, social and cultural change, employee health and tenure.

GOPDC established a social impact management plan for Kwae and Okumaning Operation for June 2014-May 2015. They will consider and revision their management plans on an annual basis. GOPDC's document on Social impact management plan presented the company's efforts to manage some issues mentioned :

Target	Proposed Actions	Time	Responsibility	Monitoring & Execution
Minimizing damage to local roads	Develop and implement a road maintenance program	To start in November 1 st 2014 and end in February 2015, throughout the project	General Services Dept. Outgrower Manager Community Relations Officer District Assembly	<ul style="list-style-type: none"> • Undertake frequent maintenance of roads • Keeping records • Periodically review the performances
Reducing pollution	Complete construction of biomethanation plant that will utilize the POME	September 2014 commission Biogas plant	Project & Utility Manager Technical Director Manager HSE manager	<ol style="list-style-type: none"> 1. Pursue cleaner production in the mill 2. Reduces the amount of smoke released, monitoring reports for all mentioned aspects 3. GOPDC should device practical means of reducing dust pollution. 4. To review the

**RSPO New Planting Procedure Assessment Report
Ghana Oil Palm Development Company Ltd – Eastern
Region, Ghana**



Target	Proposed Actions	Time	Responsibility	Monitoring & Execution
				EIA & Mitigation Plan Document annually 5. Respond to EIA 6. Periodic audits will be conducted to identify possible wastes and to reduce same
Employment opportunities for affected inhabitants Phase I	Recruit affected inhabitants for plantation work. Provide the enable environment for the affected inhabitants to provide other service on the estate	Ongoing	CRO HRM CAO NES manager	<ul style="list-style-type: none"> Keep employment data affected inhabitant (ABS) Involve Community Development Committee
Provision of infrastructure in the surrounding communities	<ul style="list-style-type: none"> Established community Consultative & Development Committee at the surrounding Communities to be involved in the Provision of infrastructure Organise capacity building training for committees established Facilitate community participation and decision making in development project 	January 2015 at least 3 project	CRO MD	<ol style="list-style-type: none"> Facilitate community participation and decision making in-development project. Monthly visit to project site. Meetings with CCDC members Monthly reports on projects execution
Land scarcity on food sufficiency	<ul style="list-style-type: none"> Consider engaging other actors to provide training and agricultural extension service to local food crop farmers to assist the better manage their existing farmland for greater productivity Consider instituting an award scheme for food crop farmers to serve as motivation Support the District Assemblies to facilitate land acquisition for food crop farming Consider providing 	November 2014 through the project First Friday of December (ie National farmers day) Beginning discussion on first quarter 2015 Second quarter 2015	MD CRO CAO	<ul style="list-style-type: none"> Regular meeting with farmers to evaluate their needs, Regular meeting with District Assembly, keep record of the meeting reports. Facilitate communication between farmers and district Assembly. Propose a project document to farmers and district Assembly

RSPO New Planting Procedure Assessment Report
Ghana Oil Palm Development Company Ltd – Eastern
Region, Ghana



Target	Proposed Actions	Time	Responsibility	Monitoring & Execution
	farm inputs (on credits basis or as part of social responsibility engagement) that allows local farmers to cultivate their existing plots more intensively to increase yield			
Periodic health and safety including cultural training for field workers	<ul style="list-style-type: none"> ▪ Provide trainers training for sectional heads on health and safety including local cultural values ▪ Further training for sectional worker on first aid and others cultural values systems ▪ Workers should be provided with appropriate PPEs ▪ Step should be taken to replace damage PPEs 	August 2014 for SHE and including the traditional cultural value discussion	CRO HSE Manager	Keep record of training reports, Keep record of PPE distribution sheets.

b. Summary of Management and Mitigation Plans (HCV).

The HCV development and preparation of management and monitoring plans was based on the result of the HCV assessment from ProForest i.e.:

	Streams/HCV/B DP Title	Buffer Zone/BDP actions necessary (Action required)	GOPDC Action plan (Action taken by GOPDC)	Responsibility	Timelin e action taken	Statu of implemen tation	Monitoring activities/ actions
Maintaining water quality and the HCVs it support							
Protecti on of rivers/ streams	Apaam, Bobiri, Kotokobon, Abena, Aberewa, Kadepong, Subinsa, Aboabo and Apesika	Buffering of water bodies as well as all riparian areas.	Set aside buffer zones and included in GIS database according to HSE SOP Management of sensible areas	Survey or	Dec. 2014	Done	Daily and monthly monitoring of buffer zones area by Surveyor
	HCV 4.1 (Bobiri River and its riparian areas)	Accurate mapping of all HCVs and their management areas in the concessions should be carried out.	Availability of accurate maps of all HCVs' management areas.	Survey or	Dec. 2014	In progress	
	All HCVs and riparian areas	Designation of a responsible person for all HCVs and riparian		HSE	Dec. 2014	Done	Daily and monthly monitoring of buffer zones

RSPO New Planting Procedure Assessment Report
Ghana Oil Palm Development Company Ltd – Eastern
Region, Ghana



	Streams/HCV/B DP Title	Buffer Zone/BDP actions necessary (Action required)	GOPDC Action plan (Action taken by GOPDC)	Responsibility	Timeline action taken	Status of implementation	Monitoring activities/actions
		areas to provide training and ensuring that field workers adhere to management recommendations .					area by Surveyor
	HCV 4.1 (Bobiri River) and all riparian areas	Delineation of all buffer zones as well as HCV 5.	Painting of all riparian areas in blue oil paint, leaving about 18-27 metres along each side of streams/rivers. Buffer zones included in GIS database	HSE Surveyor	Dec. 2014	In progress	Daily and monthly monitoring of buffer zones area by Surveyor
		HCV/buffer zone field team to delineate 60 meters buffer zones on each side of major rivers with width greater than 20 m. e.g. the Birim River)	Measure river width/buffer zone width Buffer zones included in GIS database	HSE	Not applicable	Not applicable	Daily and monthly monitoring of buffer zones area by Surveyor
Protection of rivers (HCV 4.1)	All riparian areas	Agric planting team and chemical application teams are trained to respect buffer zones.	Evidence of training and understanding of buffer zones management and monitoring.	HSE	Dec. 2014	In progress	Daily and monthly monitoring of buffer zones area by Surveyor
	All riparian areas	Replanting & maintenance teams are provided with maps of areas identified as protected areas.	Buffer zones are to be respected.	HSE	Dec. 2014	In progress	Daily and monthly monitoring of buffer zones area by Surveyor
	All riparian areas	Replanting & maintenance teams are trained to carry out felling laterally to buffer zones to avoid having it destroyed and blocked by falling trees and shrubs.	No impact on buffer zones	HSE	Dec. 2014	In progress	Daily and monthly monitoring of buffer zones area by Surveyor
	All buffer/riparian zones	Regular monitoring to ensure that buffer zones requirements are respected. If buffer zones are	Corrective actions' records	HSE	Dec. 2014	In progress	Daily and monthly monitoring of buffer zones area by Surveyor

RSPO New Planting Procedure Assessment Report
Ghana Oil Palm Development Company Ltd – Eastern
Region, Ghana



	Streams/HCV/B DP Title	Buffer Zone/BDP actions necessary (Action required)	GOPDC Action plan (Action taken by GOPDC)	Responsibility	Timeline action taken	Statu of implementation	Monitoring activities/actions
		not respected, corrective actions must be taken immediately.					
Monitoring of water quality	HCV 4.1 (Bobiri River)	Bi-annual surface water quality monitoring and Quarterly effluent monitoring testing for major rivers and all other rivers that are sources of water for host communities.	Test results	HSE		Done	Check bi-annual surface water quality monitoring and Quarterly effluent results
	HCV 4.1	Corrective/Preventive action to be taken in case of degradation of water quality. Provision of alternative water supply for affected communities/ areas	Waste + Pollutant Management Plan	HSE	Dec. 2014	Done	Check bi-annual surface water quality monitoring and Quarterly effluent results
Respecting and maintaining local communities cultural/traditional identity/values							
FPIC	HCV 6: Kwae: BDP 7, 8, 14, 15 (burial grounds), BDP 10 (Apaam Shrine) Okumaning: Bonkese Shrine	Identify appropriate management areas for those HCV 6 areas (e.g. burial grounds) and delineate those areas.	Social HCV areas included in GIS database and mapped.	Survey or/ Community Relations Officer	Dec. 2014	Done	Biannual check of maintenance of HCV 6 areas by CRO and verify if grievance letters are not related to them
		Negotiate management decisions for HCV areas following the company's FPIC procedures.	Agreement with community/concerned people	Community Relations Officer	Dec. 2014	Done	
Flora/fauna conservation programme							
Monitoring of fauna/flora species and populations in the protected areas and	BDP 10 (Kwae) : Mieso Sacred Grove (Apaam Shrine) BDP 10 (Okumaning): Aperawa Junction	Periodic fauna survey of the set-aside areas.	Survey report	HSE	Dec. 2014	Done	Periodical survey by HSE
	Estate	GOPDC shall implement community education programme on	Records of any educational or any other programme undertaken to	Community Relations Office	Dec. 2014	Under consideration	Monthly monitoring of poaching activities

**RSPO New Planting Procedure Assessment Report
Ghana Oil Palm Development Company Ltd – Eastern
Region, Ghana**



	Streams/HCV/B DP Title	Buffer Zone/BDP actions necessary (Action required)	GOPDC Action plan (Action taken by GOPDC)	Respo nsibili ty	Timelin e action taken	Statu of implemen tation	Monitoring activities/ actions
other establis hed BDPs		hunting and during “no hunting seasons” as stipulated by law.	address issues with hunting. Records of community educations conducted.	r/HSE			
	Estate	Develop and implement “no hunting / poaching” policy for employees including the use of snares and traps for hunting.	Company policy	Estate Mana gers/ HSE	Dec. 2014	Done	Monthly monitoring of poaching activities
	Estate	GOPDC shall strive to prohibit hunting within its concessions.	Company policy	Estate Mana gers /HSE	Dec. 2014	In progress	Monthly monitoring of poaching activities

VERIFICATION STATEMENT :

The social and environmental assessments were detailed, comprehensive and professionally carried out. The management plan has included the findings of the SEI Assessment conducted by the government approved consultants as well as incorporating the HCV and SIA assessments findings by consultants accredited and approved by the RSPO. GOPDC has adhered to the RSPO New Planting Procedures and has documented the assessments and plans according to the RSPO templates issued in May, 2010. TUV Rheinland auditors conducted desk study, review relevant documents and verification to field was done on 24 - 25 September 2014. Two TUV Rheinland auditors were present with the management team of GOPDC Ltd at Kvae, Kwaebirem District, Eastern Region on that time to verify the findings of the desk study and field visit and held further discussions on the review and verification conducted. It is the opinion of the TUV Rheinland auditors that GOPDC Ltd has complied with the RSPO New Planting Procedures enforced on 1st January, 2010. TUV Rheinland confirmed that the assessment and plan are comprehensive, professional and compliant of RSPO principles, criteria and indicators for the ongoing plantation activities in GOPDC Ltd.

**Signed on behalf of
TUV Rheinland Indonesia**

**Hendra Fachrurozy
Lead Auditor
Date : October 26, 2014**

**RSPO New Planting Procedure Assessment Report
Ghana Oil Palm Development Company Ltd – Eastern
Region, Ghana**



On behalf of the company, I acknowledge the responsibilities of the company to implement the management and mitigations plans.

Signed on behalf of the company,

A handwritten signature in blue ink, appearing to read 'Eric de Foresta', written over a horizontal line.

**Eric de Foresta
Director
Date : October 26, 2014**