



RSPO

PROCEDURES FOR NEW PLANTATIONS (NPP)

**COMPANY:
COMPAÑÍA PALMA TICA S.A.**

PLANNING AND MANAGEMENT SUMMARY

PREPARED BY:



BIO TERRA CONSULTORES AMBIENTALES

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Table of Contents

1. Executive Summary	2
2. Reference Documents.....	3
2.1 SEIA and HCVA Evaluation Reports	3
2.2 List of the legal documents and permits related with the areas evaluated	4
2.3 Area for the new plantations and timetable for the new plantations	6
3. SEIA and HCVA Management and the staff for implementation	11
3.1 Organizational information and contacts	11
3.1 Staff involved in planning and execution	11
3.2 Community leaders to be involved:	12
4. Summary of Management and Mitigation Plans (SEIA)	13
4.1 Mitigation plan for potential social and economic impacts for the new African Oil plantation development	13
4.1 Mitigation plan for potential environmental and social impacts for the new Oil Palm plantation development	17
4.2 Management plan for promoting positive environmental effects	27
5. Summary of the Management and Mitigation Plans (HCVA).....	27
5.1 HCVA monitoring plan and periodic date review	27
5.1 Conservation, management and mitigation plan for potential threats in the HCAs and their buffer zones.....	29
5.2 Management plan for improving and/or maintaining conservation values in the HCVA.....	31
6. Internal Responsibility	31
6.1 Formal waiver for the implementation of management and mitigation plans	31

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 south 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.

In this way, it is possible to provide an available control instrument, 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 those that are inevitable and maximizing the positive ones.

2. Reference Documents

2.1 SEIA and HCVA Evaluation Reports

Study: Criteria 7.1. RSPO Standard

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

Alexander Rosales Ibarra

Agricultural Engineer

Soils Specialists.



Agricultural Engineering Association: 5725
Evaluator for Proper Soil Use: No 38

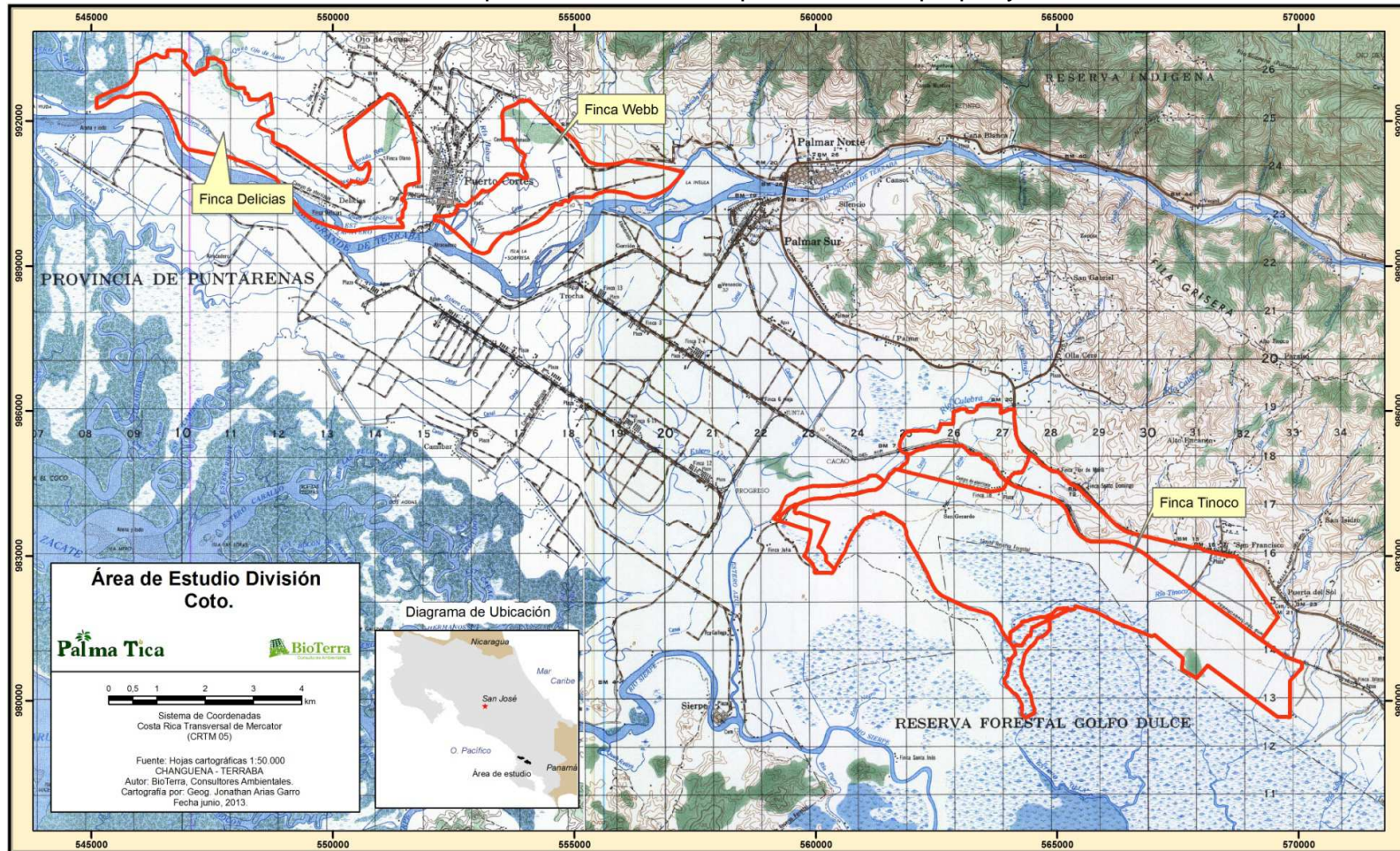
2.2 List of the legal documents and permits related with the areas evaluated

At the present time, Environmental Viability is being processed in the National Environmental Technical Secretary (SETENA), for the new proposed plantation. The Project has been assigned by the cases D1 10845-13 and D1 10206-13.

Likewise, in a simultaneous form, 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.

Location Map – both to a landscape level and a property level



2.3 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:

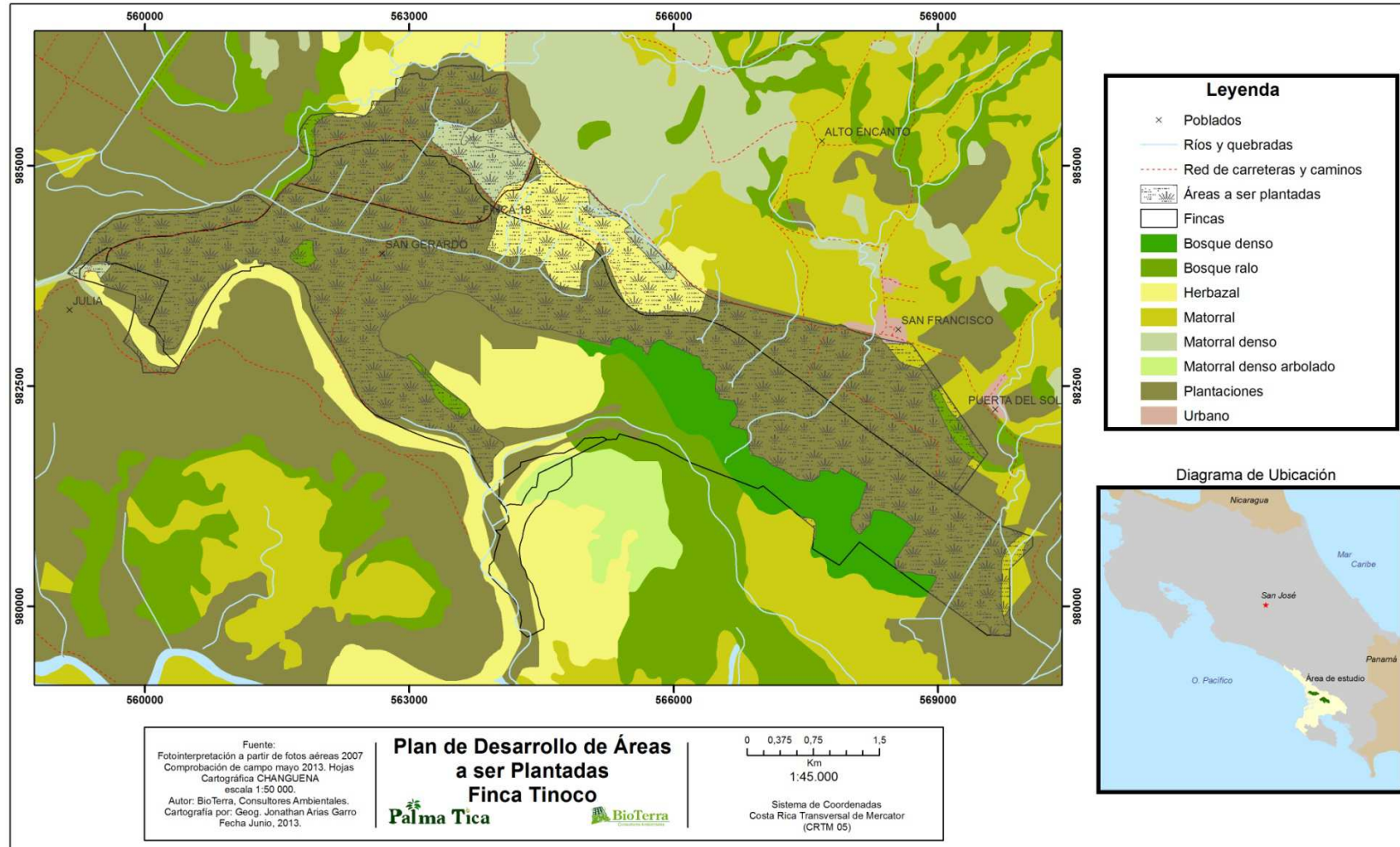
Farm's Areas versus Areas to be planted

Farm	Farm's area	Area to be planted
Tinoco	2469,81ha	1552,403ha
Webb	621,55ha	464,55ha
Las Delicias	855,99ha	514,89ha
Total	3947,35ha	2531,84ha

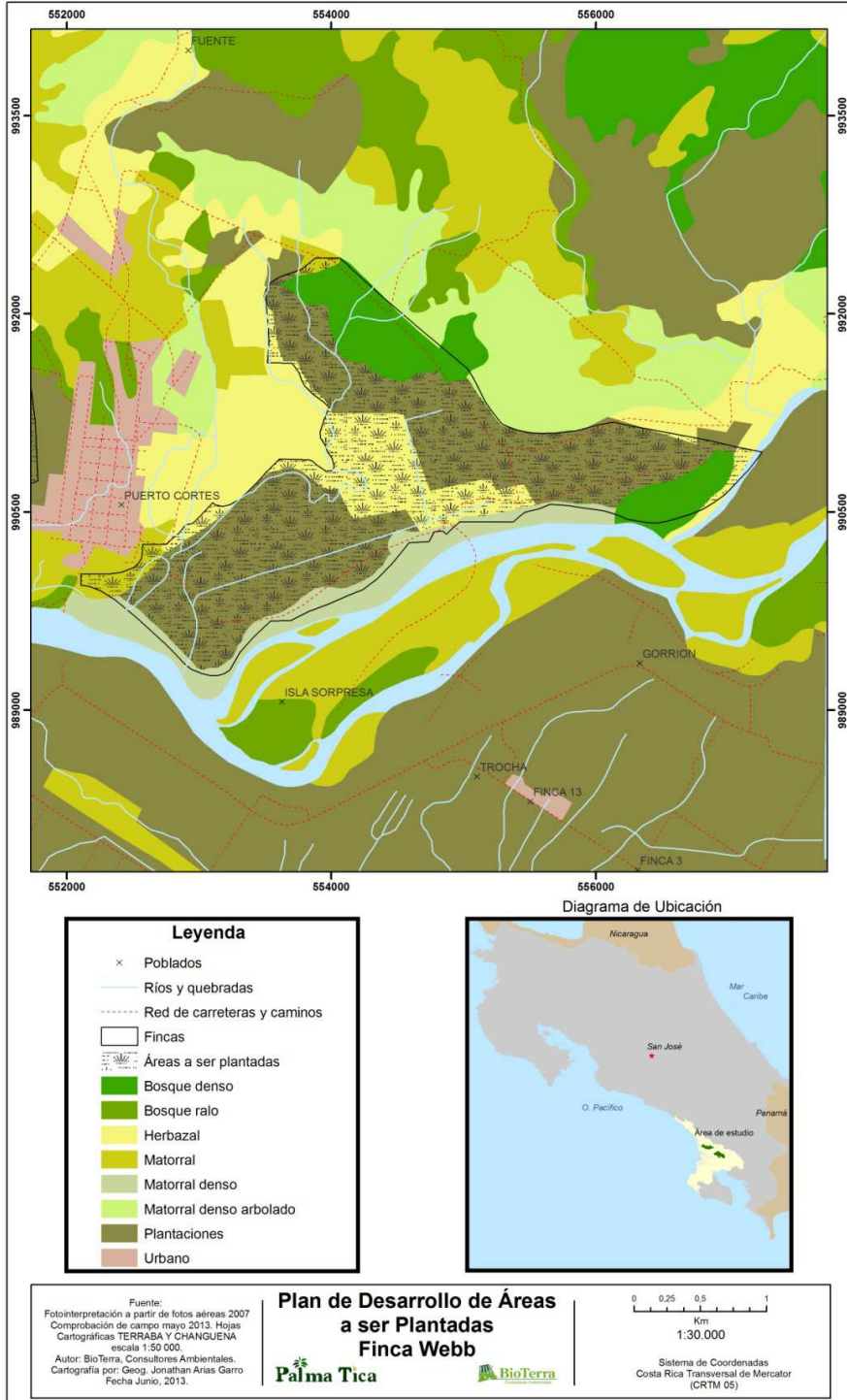
The areas to be planted are currently covered by rice fields and others, also pastures and bushes. **It is important to mention that fragile zones as bodies of water and their protected areas, forest patches and it's buffer zones will be dedicated to conservation and will remain intact.**

The following maps indicate clearly the areas to planted:

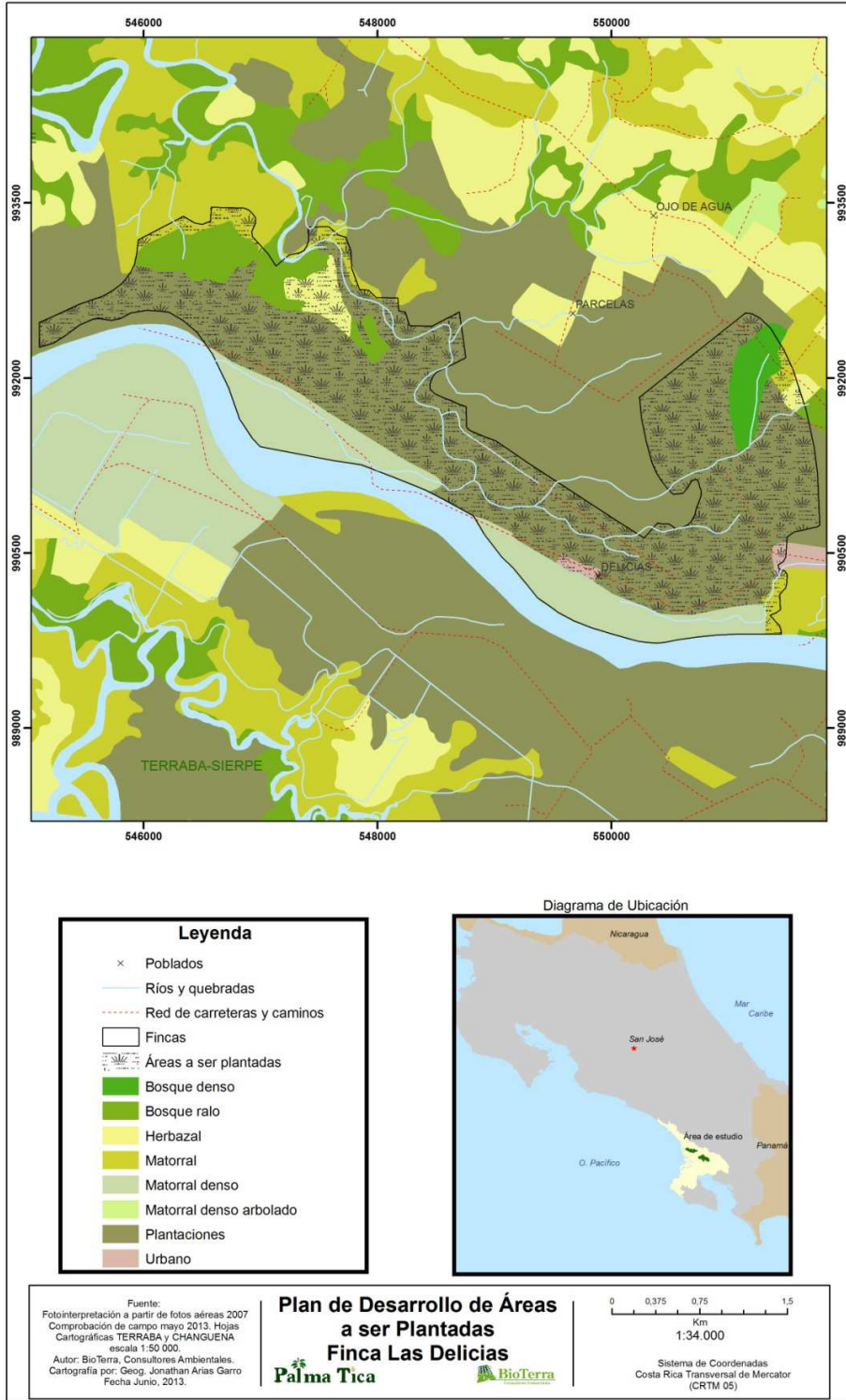
Map of the areas to be planted on Tinoco Farm



Map of the areas to be planted on Webb Farm



Map of the areas to be planted on Las Delicias Farm



The following chart shows the production timetable proposed:

Productivity	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
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	32.6
Year 13	2026	31.1
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
Year 25	2038	21.25

3. SEIA and HCVA Management and the staff for implementation

3.1 Organizational information and contacts

Name of the Company	Compañía Palma Tica S.A
Corporate Identification Number	3-101-173999
Legal Representative	Erwin Martin Holmann Pastora
Identification Number	R-155808421015
Telephone	2284-1000
Fax	2221-6371 / 2221-7340
E-mail	info@numar.net
Company's Environmental Manager	Huascar Blanco Acevedo
Identification Number	155812139109
Telephone	2785-9174
Fax	2781-1214
E-mail	hblanco@numar.net

3.1 Staff involved in planning and execution

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

➤ 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, which is a legal requisite pursuant to the dispositions issued by the National Environmental Technical Secretariat (SETENA). This person will be responsible for ensuring that Compañía Palma Tica S.A. comply effectively 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
- MNAE
- SINAC
- Ministry of Health
- Ministry of Agriculture and Livestock (MAG)

3.2 Community leaders to be involved:

- Gladys Gómez Grijalva
- Patricia Navarro Gómez
- Roberto Guzmán Mesén
- Edgardo López
- Jhonny Solís Barrantes

4. Summary of Management and Mitigation Plans (SEIA)

4.1 Mitigation plan for potential social and economic impacts for the new African Oil plantation development

Impacting Action	Potential Impact	Mitigation Measures	Phase	Responsible Party	Time frame
<p>Site preparation for planting of new plantations:</p> <ul style="list-style-type: none"> • Presence and movement of heavy machinery • Leveling the land • Creation of drainages 	<ul style="list-style-type: none"> • Change in the landscape of farms • Change and/or replacement agro-production activities 	<ul style="list-style-type: none"> • Comply with the national regulations regarding working hours and conditions • Comply with the regulations regarding transit of heavy machinery (use of tarps) • Comply with the national regulations regarding the protection of archeological resources 	<ul style="list-style-type: none"> • Preparation of the land for crops in the new African Oil Palm plantations 	<ul style="list-style-type: none"> • Compañía Palma Tica S.A. - Coto Division • Environmental manager or regent • MAG, MINSA, INDER, MTSS, and other regional offices 	<ul style="list-style-type: none"> • During the entire site preparation phase for the new African Oil Palm plantations

Impacting Action	Potential Impact	Mitigation Measures	Phase	Responsible Party	Time frame
Planting process for the new plantations: <ul style="list-style-type: none"> • Consolidation of greenhouses • Planting new African Oil Palm plants • Use of various agro-chemicals 	<ul style="list-style-type: none"> • Change in the landscape of farms • Change and/or replacement agro-production activities 	<ul style="list-style-type: none"> • Comply with the national regulations regarding working hours and conditions • Comply with the national legislation regarding handling of hazardous substances (agro-chemicals) 	<ul style="list-style-type: none"> • Planting new African Oil Palm plantations 	<ul style="list-style-type: none"> • Compañía Palma Tica S.A. - Coto Division • Environmental manager or regent • MAG, MINSA, INDER, MTSS, and other regional offices 	<ul style="list-style-type: none"> • During the entire site preparation phase for the new African Oil Palm plantations

4.1 Management plan for improvements in the social and economic contributions

Possible positive impact	Measures for maximizing the possible impact	Responsible parties
Maintain alliance with the agricultural production	<ul style="list-style-type: none"> • Carry out a training process of the different activities that integrate the cultivation and / or harvesting of palm oil 	<ul style="list-style-type: none"> • Compañía Palma Tica S.A. - Coto Division • Environmental manager or regent

Possible positive impact	Measures for maximizing the possible impact	Responsible parties
		<ul style="list-style-type: none"> • MAG, MINSA, INDER, MTSS, and other regional offices
<p>Generation of job opportunities for those individuals living in the surrounding communities</p>	<ul style="list-style-type: none"> • Give priority of employment to people living in the communities located in the vicinity of the farms where the new plantations will be developed. • Compliance with the established by the laws No.2 (Labour Code), N ° 7142 (social equality for women law), N ° 7476 (Law against sexual harassment in employment and education), No. 7600 (equal opportunities for people with disabilities law). • Respect what is established concerning to the prohibition and / or limitations of work for children in farming activities. • Develop, implement and publish a plan for occupational health and safety in order to make employees aware about the importance of using protective equipment in risk labours as a mechanism for the prevention of accidents. • Promote the study and / or training within the local population in order to provide other job options and not to be limited to the cultivation or harvesting, and give opportunities for administrative positions within the activity. 	<ul style="list-style-type: none"> • Compañía Palma Tica S.A. - Coto Division • Environmental manager or regent • MAG, MINSA, INDER, MTSS, and other regional offices
<p>Reduction of agrochemicals substances in the air due to the reduction aerial spraying</p>	<ul style="list-style-type: none"> • The use of agrochemicals substances should be more focused and less polluting methods of application, it will help to improve health and environmental conditions in the new vicinity 	<ul style="list-style-type: none"> • Compañía Palma Tica S.A. - Coto Division

Possible positive impact	Measures for maximizing the possible impact	Responsible parties
	<p>communities of the new oil palm plantation.</p> <ul style="list-style-type: none"> • Provide conditioned spaces for the correct management of agrochemicals substances which shall be used in the greenhouses or in the new oil palm plantations for the control of pests or improving productivity. • Train the working agrochemicals personnel for proper handling, and thereby reduce health problems in the employees or population as well as the nearby fauna and flora to the greenhouses or plantations. • Respect what is established in the national legislation for the disposal of waste or surplus of agrochemicals substances. 	<ul style="list-style-type: none"> • Environmental manager or regent • MAG, MINSA, INDER, MTSS, and other regional offices
<p>Keep relation with the agricultural activity.</p>	<ul style="list-style-type: none"> • Conduct a training process of the different activities related with the cultivation and / or harvesting of oil palm. 	<ul style="list-style-type: none"> • Compañía Palma Tica S.A. - Coto Division • Environmental manager or regent • MAG, MINSA, INDER, MTSS, and other regional offices

4.1 Mitigation plan for potential environmental and social impacts for the new Oil Palm plantation development

Impacting Action	Environmental Measures	Application Timeframe	Responsible for implementation
Soil removal	<ul style="list-style-type: none"> The work will be stopped immediately if archeological materials are found; inform the corresponding officer (or the National Museum of Costa Rica) and act according to his or her recommendations. 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. All fill material must be compacted. 	<p>NA (This is to take place only in the initial site preparation stage)</p>	The Company
Dust generation	<ul style="list-style-type: none"> If it is necessary to export materials from the farms, trucks must be covered with tarpaulins to avoid spreading dust particles. Apply vegetal coverage (Kudzu) on the uncovered soil. 	D	The Company
Deterioration of air quality	<ul style="list-style-type: none"> Ensure that the machinery used for the works is in good mechanical condition (does not generate excessive smoke). 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. Comply with the current laws regarding noise levels (Refer to Decree No. 78718-S). Hire trained personnel for the operation of machinery. Implement a work schedule involving machinery that ensures the 	D	The Company

	<p>minimum noise disturbance possible (6am a 6pm).</p> <ul style="list-style-type: none"> • The measures regarding to the dust management indicated in the previous section are repeated. • Give preventive and corrective maintenance to all the vehicles and machinery. • Data consumption that generate emissions of CO₂ of every activity will be collected, as well as a collection of clearing activities that are available to reach a level of carbon neutral. 		
<p>Surface water pollution</p>	<ul style="list-style-type: none"> • Do not perform preventive maintenance of heavy machinery within the farms. In case of corrective maintenance inside the plantations ensure not to leave waste. • Ensure that heavy machinery and vehicles are in optimal mechanical conditions, to avoid leaks or spills. • Have a containment plan for fuel spills, to avoid any type of pollution. • Store solid wastes in a location for that purpose, for due treatment and remove them from the farm periodically. • 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. • Do not discharge untreated solid or liquid wasted into bodies of water. • Provide periodical maintenance to the rain water drainage network in the farms. • Do physical - chemical analysis periodically in the bodies of water which are in the environment of the plantations. • For every plague and disease due to the crop, will be determined the cultural, biological, mechanical or physical practices in order to minimize the use of agrochemicals, • Tests will be made in order to avoid the use of pesticides type 1A and 	<p>D and Q (in the event of maintenance to canals and drainages)</p>	<p>The Company</p>

	<p>1B of the World Health Organization, paraguat or cataloged for the Estocolmo or Rotterdam convention.</p> <ul style="list-style-type: none"> • Set up an application program based on the established threshold for the only use of pesticides authorized in Costa Rica for the application in oil palm • A preventive maintenance program for the equipments will be carried out and its owing identification and registry of maintenance and calibration made. • Procedures will be established in order to comply with the Costa Rican legislation and the international standards of BPA for the storage of pesticides. • Necessary procedures will be provided for the adecuate operation of the water treatment system with pesticides from the waste and containers washing, personnel, uniforms and application equipment. • Analysis of sewage will be programmed for the fulfillment of the legislation and the presentation of the required informs. 		
<p>Soil and underground water pollution</p>	<ul style="list-style-type: none"> • This section reiterates the measures described in the previous section, except those relating to the maintenance canals and drains. 	<p>D</p>	<p>The Company</p>
<p>Generation of solid waste</p>	<ul style="list-style-type: none"> • Also, where applicable, waste must be returned to the suppliers, such as product containers used for applications and others. • Set up a waste collection area within one of the farms and classify according to type. • 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. • Give weekly maintenance to the waste containers installed in each 	<p>D, W and M</p>	<p>The Company</p>

	<p>farm, to avoid bad smells.</p> <ul style="list-style-type: none"> • Establish waste management systems to minimize waste generation as much as possible (recycling), implementing a basic classification system and waste utilization. • Farms must be in orderly and clean conditions. • Collect waste periodically, with proper sanitary final disposal, in a location authorized by the Ministry of Health. • To have as a business policy, the maximum reuse of all materials where applicable. • Coordination with the waste collection companies about the management of every type of waste. The deliveries of waste to such collection companies will be registered and the fulfillment of the established management will be monitored. 		
<p>Water consumption</p>	<ul style="list-style-type: none"> • Participation in national or local campaigns which are done to promote saving water. • Implementation of the necessary measures to minimize the consumption of the resource. • The company should train the personnel in thematics about the rational use of the water. • A plan of irrigation will be define (mainly in the field nursery), where the following points are established: <ul style="list-style-type: none"> ➢ Calculation of crop water needs ➢ Selection of the irrigation system that takes into account the conservation the water resource. ➢ Optimization plan of consumption and minimization of losses. • Manage the required permissions to the waters department of MINAE for water use in case wells or surface water would be used. • A monitoring irrigation water will be established, for the purpose of not to endanger the environment, crop, fruit and the people. 	<p>D</p>	<p>The Company</p>

	<ul style="list-style-type: none"> • There will be a daily registry of water applications in the crop. • Flows will be checked to determine the level of fulfillment based on the requirements law of irrigation. 		
<p>Potential effect on the biological environment (forest coverage, bodies of water and their buffer zones)</p>	<ul style="list-style-type: none"> • 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. • Notify MINAET of the presence of endangered flora or fauna species, if found during the project's development. • If possible burrows, shelters or nests of any species are identified, coordinate with specialists and MINAET for relocation. • Ensure no impact on the forest coverage or the water protection zones associated with each of the farms. • Keep strict erosion and sedimentation control practices, mainly regarding surface runoff draining towards the bodies of water associated with the farms. • Promote vegetation recovery plans in the associated water protection zones, in full coordination with MINAET. • Monitor the physical and chemical conditions in the associated bodies of water, twice a year. • Take samples from the bodies of water for benthic macro-invertebrates (biological indicators), once a year. • Clearly identify all those areas cataloged as HCVA. • Active participation in local and regional programs for the conservation of biodiversity in Protected Wild Areas (PWA). • Ensure that the boundaries of the plantations do not invade those areas cataloged as HCVA. • Identify Internal problems in the company, in terms of the management of the plantation that might affect HCVA or HCV. • Identify local and regional problems that may affect these areas. 	<p>NA and SE (in the event of water monitoring)</p>	<p>The Company</p>

	<ul style="list-style-type: none"> • Monitor the behavior and dynamic of the ecosystem at a landscape level in general, to determine if they are affecting HCVA. • Respect a buffer zone of 10 meters regarding to all the areas with forest coverage. • Encourage natural regeneration in each of the buffer zones. 		
<p>Occupational safety risks</p>	<ul style="list-style-type: none"> • 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. • Comply with the regulations and technical guidelines set forth by the authorities, with regards to Occupational Health and Safety. • 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. • Define the guidelines and safety measures that must be applied by workers for their personal safety. • 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. • Provide employees with initial and ongoing training on health and safety matters. • Limit access to the Plantation to authorized personnel only. • Create policies for the use of personal protection equipment (PPE) and train employees in the correct use of said equipment. • Make the use of PPE mandatory for all employees, according to the tasks performed. • Provide insurance coverage for the employees with an Occupation Risk Insurance Policy from the National Insurance Institute (INS). 	<p>NA and D (when using PPE and guidance compliance)</p>	<p>The Company</p>

	<ul style="list-style-type: none"> • Issue warnings to those employees not complying with the safety guidelines set forth for the project. • Not to plant palm to the roadside, to avoid accidents for electrocution due to contact between the rod that is used to cut fruit and high voltage cables. • Allow employees to move to the nearest toilet if they require it. • Evaluations will be made about physical and chemical agents in the activities identified as hazardous, in order to take corrective measures that merit. • Equipment shall be available for rescue and basic first aid. • There will be an annual medical evaluation of employees who apply pesticides. 		
Vehicular traffic	<ul style="list-style-type: none"> • Post signs that warn drivers and pedestrians about heavy machinery and vehicles exiting and entering the farms. • Observe and respect the maximum speed for heavy machinery and vehicles of 25 km/h. 	NA and D (with regards to the maximum allowed speed)	The Company
Replacement of production activity (ricefields)	<ul style="list-style-type: none"> • Fully comply with the national regulations regarding work schedules and conditions • Respect the national legislation about the protection of archaeological resources. • Respect the national legislation about the management of hazardous substances (agrochemicals). 	D	The Company
Changes in the landscape	<ul style="list-style-type: none"> • 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. 	NA	The Company

	<ul style="list-style-type: none"> • Ensure no impact on the forest coverage or the water protection zones associated with each of the farms. • Promote vegetation recovery plans in the associated water protection zones, in full coordination with MINAET. 		
Generation of job opportunities	<ul style="list-style-type: none"> • Give priority of employment to people from communities located in the vicinity of the farms, where the new plantations will be developed. • Compliance with the established by the laws No.2 (Labour Code), N ° 7142 (social equality for women law), N ° 7476 (Law against sexual harassment in employment and education), No. 7600 (equal opportunities for people with disabilities law). • Respect what is established concerning to the prohibition and / or limitations of work for children in farming activities. • Develop, implement and publish a plan for occupational health and safety in order to make employees aware about the importance of using protective equipment in risk labours as a mechanism for the prevention of accidents. • Promote the study and / or training within the local population in order to provide other job options and not to be limited to the cultivation or harvesting, and give opportunities for administrative positions within the activity. 	NA and D (in the case of respecting the standards)	The Company
Economic stability	<ul style="list-style-type: none"> • Involve people in order to venture into the growing and / or harvesting of oil palm in the agrochain of Oil Palm in the Brunca Region. • Conduct a training process of the different activities related with the cultivation and / or harvesting of oil palm, in order to ensure the proper insertion of people to the activity. 	NA	The Company

<p>Reduction of aerial spraying</p>	<ul style="list-style-type: none"> • The use of agrochemicals substances should be more focused and less polluting methods of application, it will help to improve health and environmental conditions. • Provide conditioned spaces for the correct management of agrochemicals substances which shall be used for the control of pests or improving productivity. • Train the working agrochemicals personnel for proper handling, and thereby reduce health problems. • Respect what is established in the national legislation for the disposal of waste or surplus of agrochemicals substances. 	<p>NA</p>	<p>The Company</p>
<p>Improvements to the communities</p>	<ul style="list-style-type: none"> • Establish a protocol of contributions to the communities located in the vicinity of the farms. • Promote community environmental education programs. • Celebrate the Environment Day in the school communities. • Organize a health fair with the support of the "CCSS". Ebais. • Continue promoting and supporting the recycling program in the communities. • Contribute to educational institutions according to request and availability of resources. • Promote campaigns against the dengue mosquito in coordination with the Ministry of Health. • Contribute to the needs of the community according to request and availability of resources. • Establish alliance with MINAE to mark sensitive areas for hunting, illegal dumping, poisoning rivers, wastewater discharge, and others. • Training schools in emergency care. 	<p>NA</p>	<p>The Company</p>



NA: Not applicable, D: Daily, M: Montly, W: Weekly, Q: Quaterly, SE: Semiannual

4.2 Management plan for promoting positive environmental effects

This section notes that oil palm plantations in the proposed area will function as a barrier and damping control for the flooding and sediment transportation phenomena that every year affect inevitably T rraba Sierpe wetland and vicinity communities. This is considered a highly positive impact for the region.

On the other hand, it is also important to mention that oil palm plantations can give more sustainability to a greater diversity of wildlife than ricefields, grasslands and bushes which are currently occupying most of the proposed farms, this is also an aspect considered as a positive impact for the region.

Regarding to the management plan to promote these positive impacts, it is noted that upon completion of the proposed management plan in the previous point, positive environmental effects would be generated automatically, since the plan seeks among other things, to protect and promote all those ecosystems with conservation potential such as bodies of water, riparian vegetation, isolated forest parks and others.

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

5.1 HCVA monitoring plan and periodic date review

Below are a series of recommendations for management and monitoring, in order to establish sustainable management mechanisms for the HCVA's identified.

General actions:

- ❖ Establish contact with local institutions, non-government and government agencies, in order to give out the conservation and management policies and the actions to be executed.
 - ❖ Take a firm position and inform the surrounding communities about the policies and actions that will be executed by the Company regarding to environmental matters.
 - ❖ Identify social and cultural behaviors that may affect the HCA and formulate solutions.
 - ❖ Identify internal Company problem issues regarding to the management of future plantations that could affect the HCAs identified.
 - ❖ Identify local and regional problem issues regarding to any 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.

5.1 Conservation, management and mitigation plan for potential threats in the HCAs and their buffer zones

In the 3 proposed farms were identified HCVAs. In order to preserve these areas, the following chart details the environmental measures that must be observed:

Objective	Environmental Impact	Environmental Measure	Application Timeframe	Responsible Party
Ensure respect and maintenance of all bodies of water and forest coverage present in the farms and influence areas	Potential affectionation on the biological environment (forest coverage and bodies of water)	<ul style="list-style-type: none"> • Prior to cutting down any forest species (in a requested case), 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. • Notify MINAE of the presence of endangered flora or fauna species, if found during the project's development. • If possible burrows, shelters or nests of any species are identified, coordinate with specialists and MINAE for relocation. • Ensure no impact on the forest coverage or the water protection zones associated with each of the farms. • Keep strict erosion and sedimentation control practices, mainly regarding surface 	Periodical application. However, constant alert should be in place with regards to these measures. For water monitoring, periodicity shall be every semester.	The Company

		<p>runoff draining towards the bodies of water associated with the farms.</p> <ul style="list-style-type: none"> • Promote vegetation recovery plans in the associated water protection zones, in full coordination with MINAE. • Monitor the physical and chemical conditions in the associated bodies of water, twice a year. • Take samples from the bodies of water for benthic macro-invertebrates (biological indicators), twice a year. • Respect a buffer zone of 15 meters regarding to forest coverage zones. • Promote a natural regeneration of every buffer zone. 		
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5.2 Management plan for improving and/or maintaining conservation values in the HCVA

The conservation, management and mitigation plan proposed in the previous chart, simultaneously integrates management to improve and / or maintain the conservation values of the HCVAs identified in the different farms.

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,



*Biol. Marisol Zumbado Bustillos, MSc
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Bio Terra Consultores Ambientales*
