

**RSPO PRINCIPLE AND CRITERIA
1st Annual Surveillance Assessment (ASA1)
Public Summary Report**

Olam International Limited
Head Office: 9 Temasek Boulevard #11-02 Suntec Tower Two Singapore
Certification Unit: Olam Palm Gabon – Awala Palm Oil Mill & Supply Base Galerie Tsika, En Face de city Sport, Mbolo BP: 1024, Libreville Gabon, Africa

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Section 1: Scope of the Certification Assessment

1. Company Details			
RSPO Membership Number	1-0114-12-000-00	Date	Member since: 10 February 2011
Company Name	Olam Palm Gabon		
Address	Head office : 9 Temasek Boulevard, #11-02 Suntec Tower Two, Singapore Certification Unit : Olam Palm Gabon – Awala Palm Oil Mill, Galerie Tsika, En face de city Sport, Mbolo, BP: 1024, Libreville, Gabon, Africa		
Subsidiary of (if applicable)	Olam International Limited		
Contact Name	Ms Audrey Lee (Sustainability Manager)		
Website	http://olamgroup.com/	E-mail	audrey.lee@olamnet.com
Telephone	+603 64416771	Facsimile	+603 64416772

2. Certification Information			
Certificate Number	RSPO 651890	Certificate Issued Date	25/08/2016
		Expiry Date	24/08/2021
Scope of Certification	Palm Oil and Palm Kernel Production from Awala Palm Oil Mill and Supply Base: Awala Plantation (Bokoue Estate, Lobe Estate and Komo Estate)		
Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
RSPO 654791	Production of Palm Kernel and Palm Kernel Expeller (Mass Balance Model)	BSI Services Malaysia Sdn Bhd.	21 July 2021

3. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS	
		Easting	Northing
Awala Palm Oil Mill	Kango, Gabon, Central Africa	10° 11' 51.8172"E	0° 01' 19.1549"S
Bokoue Estate	Kango, Gabon, Central Africa	10° 12' 23.3188"E	0° 0' 1.8988"N
Lobe Estate	Kango, Gabon, Central Africa	10° 12' 16.9013"E	0° 02' 21.552"S
Komo Estate	Kango, Gabon, Central Africa	10° 09' 6.9117"E	0° 01' 54.3354"N

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4. Description of Supply Base							
Estate	Immature (ha)	Mature (ha)	Total Planted (ha)	HCV (ha)	Infras & Other (ha)	Total Hectarage	% of Planted
Bokoue Estate	143	2,170	2,313	791	199	3,303	70.03
Lobe Estate	79	2,160	2,239	646	202	3,087	72.53
Komo Estate	98	2,172	2,270	11,045	325	13,640	16.64
Total	320	6,502	6,822	12,482	726	20,030	

Note: Infras = infrastructure

5. Plantings & Cycle								
Estate	Age (Years)					Tonnage / Year		
	0 - 3*	4 - 10*	11 - 20	21 - 25	26 - 30	Estimated (ASA1) (Jan-Dec 16)	Actual (ASA2) (July 2016 – June 2017)*	Forecast (ASA2) (July 2017 – June 2018)*
Bokoue Estate	143	2,170	-	-	-	29,566.00	10,478.00	28,057.00
Lobe Estate	79	2,160	-	-	-	28,130.00	12,018.00	29,672.00
Komo Estate	98	2,172	-	-	-	19,926.00	5,607.00	19,892.00
Total	320	6,502	-	-	-	77,622.00	28,105.00	77,621.00

*The reporting period has been revised from Jan-Dec to July-June to ease the comparison follow the audit schedule.

6. Certified Tonnage of FFB (Own Certified Scope)			
Estate	Tonnage / year		
	Estimated (ASA1) (Jan-Dec 16)	Actual (ASA2) (July 2016 – June 2017)	Forecast (ASA2) (July 2017 – June 2018)
Bokoue Estate	29,566.00	10,478.00	28,057.00
Lobe Estate	28,130.00	12,018.00	29,672.00
Komo Estate	19,926.00	5,607.00	19,892.00
Total	77,622.00	28,105.00	77,621.00

7. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable			
Independent FFB Supplier	Tonnage / year		
	Estimated (ASA1) (Jan-Dec 16)	Actual (ASA2) (July 2016 – June 2017)	Forecast (July 2017 – June 2018)
Mouila	4,003.00	5,883.00	0
Makouke	6,113.00	14,780.00	25,138.00
Agrofor	0	6	240.00
Total	10,116.00	20,669	25,378.00

8. Certified Tonnage									
Mill	Estimated (Jan-Dec 16)			Actual (July 2016 – June 2017)			Forecast (July 2017 – June 2018)		
	FFB	CPO	PK	FFB	CPO	PK	FFB	CPO	PK
Awala Palm Oil Mill	77,622.00	17,464.95	3,492.99	28,105.00	6,424.00	1,119.00	77,621.00	19,017.34	3,492.98

Actual OER 22.85%, KER 3.98% (as per July 2016 – June 2017 period)

2016 actual OER 21.57% KER 4.14%

2017 forecast OER 22.5% KER 4.5%

2018 forecast OER 24.5% KER 4.5%

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd,
(ASI Accreditation Number: RSPO-ACC-19)
Unit 3, Level 10, Tower A
The Vertical Business Suites, Bangsar South
No. 8, Jalan Kerinchi
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BSI is a leading global provider of management systems assessment and certification, with more than 60,000 certified locations and clients in over 100 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (RSPO-ACC-19) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia. BSI is accredited for RSPO Supply Chain Certification Systems (SCCS) and Principles & Criteria for Sustainable Palm Oil Production (P&C, Single Site & Group) certification Worldwide.

Assessment Methodology, Programme, Site Visits

This on-site assessment was conducted from 19 – 21 June 2017. The audit programme is included as Appendix D. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estate (Bokoue Estate & Komo Estate). A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. Gabon RSPO Principles and Criteria National Interpretation endorsed by the RSPO Board of Governors meeting on 6th March 2017 and RSPO Supply Chain Certification Standard 2014 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. The mill was audited together with the estates (or smallholders) of its supply base. The estates sample were determined based on formula $N = 0.8\sqrt{y}$ where y is the number of estates while when applicable, the smallholders sample were determined following the RSPO Certification Requirement for Group Certification Standard 2016. The sampling of smallholders were based on the formula $(0.8\sqrt{y}) \times (z)$; where y is total number of independent group member and where z is the multiplier defined by the risk assessment. The sampled smallholder (when applicable) is listed in Appendix J.

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings.

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Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Appendix E and the sampled smallholder (when applicable) is listed in Appendix J

The previous nonconformity is remains closed. The assessment findings for the 1st Annual Surveillance Assessment are detailed in Section 3.3.

This report is structured to provide a summary of assessment finding as attached in the Appendix A. The assessment was based on random samples and therefore nonconformities may exist that have not been identified.

This report was internally reviewed by RSPO approved Certification Reviewer prior to certification decision by BSI.

The following table would be used to identify the locations to be audited each year in the 5 year cycle

1. Assessment Program					
Name (Mill / Supply Base)	Year 1 (Initial Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA4)
Awala Palm Oil Mill	√	√	√	√	√
Bokoue Estate	√	√		√	
Lobe Estate	√		√	√	√
Komo Estate		√	√		√

[Click here to enter a date.](#)

Tentative Date of Next Visit: May 1, 2018 – May 3, 2018

Total No. of Mandays: 9 mandays

BSI Assessment Team:

Hoo Boon Han – Lead Auditor

He holds Master of Technology (Environmental Management) from the University Malaya and Bachelor of Science Forestry (Hons) Majored in International Tropical Forestry from University Malaysia Sabah. He has more than 3 years working experience in in environmental monitoring & audit, carbon accounting & reduction, wastewater treatment, waste management and sustainable development. He has successfully completed the RSPO Lead Auditor and RSPO Supply Chain Training in April 2012. He has been involved in RSPO P&C audit in Indonesia and Malaysia as well as RSPO SC audit across different region including Asia, Europe and North America for the past 4 years. During this assessment, he assessed on the aspect of environment, Safety and Health, Legal, social and community engagements, stakeholders consultation, and workers welfare. He is able to speak and understand Bahasa Malaysia, English and Mandarin.

Mohd Hafiz Bin Mat Hussain – Team Member

He holds Bachelor Degree in Plantation Technology and Management, graduated from University Technology Mara (UiTM) on 2009. He has 4 years working experience in oil palm plantation industry. He also has the experiences as an auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO in his previous certification body. He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2013, Endorsed RSPO P&C Lead Auditor Course in 2014 and MSPO Awareness Training in 2014. He had been involved in RSPO auditing since May 2013 in more than various companies in Malaysia. During this assessment, he assessed on the aspects of legal, mill best practices, estate best practices, safety and health, environmental and workers and stakeholders consultation.

Hu Ning Shing – Team Member

She holds Bachelor Degree in Science majoring in Applied Chemistry, graduated from University of Malaya on 2011. She has 5 years working experience in rubber and palm oil industry. She also has the experiences as auditor for several standards including ISO 9001, MSPO and RSPO in her previous certification body. She completed the ISO 9001 Lead Auditor Course on 2016, Endorsed RSPO P&C Lead Auditor Course in 2012 and Endorsed RSPO SCCS Lead Auditor Course in 2015. She had been involved in RSPO auditing since November 2015 in more than various companies in Malaysia. During this assessment, she assessed on the aspects of social. She is fluent in Bahasa Malaysia and English languages.

Accompanying Persons:**Jean-Jacques Jaume (Local expert)**

He was appointed as the local expert based on his qualification and experience in management system auditing in African continent as an external resource with BSI South Africa. He has the vast experience in auditing the Occupational Safety and Health as well as the Environmental Management system. He can speak and communicate French with local communities.

Gauthier Perciano Iboinga Kombila (Translator)

He working as a translator for an agency providing a translation and interpretation service to clients where needed. His main function during the assessment (conversation and documentation) was for the translation of French to English and vice-versa.

Section 3: Assessment Findings

3.1 Details of audit results

This assessment has been assessed using the following RSPO normative requirements. The assessment details are provided in Appendix A.

- Olam International Limited Time Bound Plan
- Gabon RSPO Principles and Criteria National Interpretation endorsed by the RSPO Board of Governors meeting on 6th March 2017
- RSPO Supply Chain Certification Checklist November 2014

3.2 Progress against Time Bound Plan

Time Bound Plan		
Requirement	Remarks	Compliance
Summary of the Time Bound Plan		
Does the plan include all subsidiaries, estates and mills?	<p>The time bound plan includes all operating units in Gabon, Africa.</p> <p>The certification plan is revised and approved in August 2016 to include new acquisition. See annex.</p> <p>To date, certification was achieved according to the time bound plan.</p> <p>On 2017 onwards, the plan is to certify Mouila Lot 1, Mouila Lot 3, Mouila Lot 2 and the smallholders' agricultural program, GRAINE (Gabon des Réalisations Agricoles et des Initiatives des Nationaux Engages).</p>	Complied
<p>Is the time bound plan challenging?</p> <ul style="list-style-type: none"> • Age of plantations. • Location. • POM development • Infrastructure. • Compliance with applicable law. 	<p>Based on the age of plantations, location, mill developments, infrastructure and compliance with applicable law, the time bound plan was deemed to be challenging since Olam has developed the plantation at very early stage which involved the New Planting Procedure (NPP) where the land development and initial planting was only started in 2010 in Gabon.</p> <p>Except for Awala Palm Oil Mill commissioned in Aug 2015 and Mouila Lot 1 mill commissioned in Dec 2016, all other mills are still under development while infrastructure development was still in-progress except for basic office and housing facilities.</p>	Complied
Have there been any changes since the last audit? Are they justified?	See above. The certification plan is revised and approved in August 2016 to include new acquisition. See annex.	Complied
If there have been changes, what circumstances have occurred?	New acquisition.	Complied
Have there been any	As of the date of the report being produced, there is no any comment by stakeholder that could be taken	

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stakeholder comments?	action by Olam. Olam continues to engage all affected parties through regular discussions and progress reporting is being made to the RSPO Secretariat.	Complied
Have there been any newly acquired subsidiaries?	Yes. New acquisition of existing plantation from SIAT Gabon was finalized in July 2016.	Complied
Have there been any isolated lapses in implementation of the plan?	No lapse and in full compliance.	Complied
Un-Certified Units or Holdings		
Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	Prior to the certification audit, a gap assessment has been conducted for Awala by Olam in 2013. Internal assessment against the standard has also been completed for most of the operating units including Mouila Lot 1 and GRAINE while closing of gaps is in progress. A positive assurance statement has been produced through the internal gap assessment audit.	Complied
No replacement after dates defined in NIs Criterion 7.3: <ul style="list-style-type: none"> • Primary forest. • Any area identified as containing High Conservation Values (HCVs). • Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3. 	HCV assessment has been conducted by Proforest prior to Awala development and according to the NPP 2010. Public summary report is available on the Olam's website.	Complied
Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	All uncertified areas including Mouila Lot 1, 2, 3, Lot 3 extension have completed NPP and approved after the RSPO 30-days public consultation.	Complied
Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	Mouila Lot 2 in March 2017, 242 ha of community set aside (HCV6) identified through FPIC process claimed by Bemboudie Village is mistakenly classified as development area under Boungounga Village who share some families and territories with Bemboudie. Mutual agreement and resolutions was reached through direct engagement and third party facilitation. Grievance is closed for monitoring. See public record . Meeting record, agreement and official reply from the Bemboudie village are available.	Complied
Any Labor disputes are being resolved through a	No dispute, however, collective agreement was revised and agreed by the self-elected workers representatives in	

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mutually agreed process, in accordance with RSPO criterion 6.3.	all sites (including uncertified units) in Mar 2017.	Complied
Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	-As above As of the date of the internal audit report being produced. Further details please refer to the RSPO Complaints Website: http://www.rspo.org/members/status-of-complaints?keywords=olam&country=&category	Complied
Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	No legal non-compliance. A separate external legal audit was conducted in 2017.	Complied

3.3 Details of findings

The nonconformity is listed below. The summary report of the assessment by criteria is listed in Appendix A.

During the 1st Annual Surveillance Assessment there was 1 (one) Minor nonconformity raised. The Awala Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Major Nonconformity(ies) has been verified for its effectiveness and closed accordingly.

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1491644-201706-N1	Requirements Indicator 5.6.3 A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools.	Minor
	Evidence of Nonconformity Rubbish and oil trace were observed at both oil traps. The gate valve did not close as oil trace detected at the outlet of the oil trap.	
	Statement of Nonconformity In Awala palm oil mill, the monitoring of oil trap is not implemented effectively.	

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	<p>Corrective Actions Immediate action: Clean outlet drain</p> <ul style="list-style-type: none"> • Include maintenance of oil traps (open/ close according to mill maintenance schedule) • Include this action into the QEHS weekly checklist to ensure implementation <p>Preventive Actions: Assign person in charge, include maintenace of oil traps (open/ close according to mill maintenance schedule)</p> <p>Include into the QEHS weekly checklist to ensure implementation</p> <p>Continuos internal safety and RSPO audit to ensure compliance.</p>	
	<p>Assessment Conclusion The CAP and evidence has been submitted on 30/6/2017. The continuous implementation of the corrective action will be verified during the next surveillance assessment.</p>	

Observation	
OBS #	Description
1	Nil

Positive Findings	
PF #	Description
1	Commitment in protection of high conservation value forests and ecosystems.
2.	All estates are carbon neutral, sequestration mainly from crop planting on low carbon stock area (degraded area/ savannah) and sequestration from conservation set asides.

Issues raised by Stakeholders
<p>Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Awala Palm Oil Mill Certification Unit’s environmental and social performance, legal and any known dispute issues.</p> <p>Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and later was verified with the management team. These have been incorporated into the assessment findings.</p> <p>Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Appendix E.</p>

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IS #	Description
1	<p>Issues: Prefet de Kango</p> <ul style="list-style-type: none"> i. Why there are difference of wages between Mouila and Awala Plantation? ii. Not sufficient of workers' quarter to cater all the workers in Awala Plantation. iii. Truck that transported the workers were drove dangerously and workers claimed it was not comfortable. iv. Poor maintenance of solar panel unit in villages. v. To construct school inside the plantation compound. <p>Management Responses:</p> <ul style="list-style-type: none"> i. They have signed a Collective Agreement with all the delegates and local authorities on 8/2/2017 to standardize the wages in all Olam Palm Gabon. ii. Total 13 workers' quarters were under construction at Komo Estate and Bokoue Estate and 6 blocks were completed. iii. They have carried out weekly monitoring of speed by using speed camera in plantation. They will issue warning letter to the drivers if found over the speed limit. iv. They have conducted maintenance on weekly basis and will immediately repair if there is any broke down. v. Kindergarten was established inside the plantation's compound. <p>Audit Team Findings:</p> <ul style="list-style-type: none"> i. Seen the Collective Agreement where the delegates and authorities have acknowledged on the agreement with all the terms stated. ii. Verified the contract agreement with the contractor for construction of housing and onsite verified that the construction is under progress. iii. Seen the Speed Control Trucks and Vehicle report where the management has monitored the speed of lorry driver. iv. Evident of the weekly maintenance report was sighted and action has been taken. v. Onsite verified that the kindergarten was established in the plantation.
2	<p>Issues: Department of Forestry</p> <ul style="list-style-type: none"> i. No issue with Olam Palm Gabon. They have good commitment to comply with the regulations. <p>Management Responses: The management will continue to comply the regulations.</p> <p>Audit Team Findings: No further issue.</p>
3	<p>Issues: Department of Agriculture</p> <ul style="list-style-type: none"> i. They hope the management could provide the list of chemicals handling in the plantation. <p>Management Responses: The management has established the chemical register and will submit to the relevant department.</p> <p>Audit Team Findings: This will be verify during the next surveillance audit.</p>
4	<p>Issues: Department of Education</p> <ul style="list-style-type: none"> i. They hope Olam Palm Gabon could constructed school inside the plantation instead of at the villages. <p>Management Responses: i. The management has constructed kindergarten inside the plantation.</p> <p>Audit Team Findings: i. Site visit to the kindergarten inside the plantation.</p>

<p>5</p>	<p>Issues: Department of Health</p> <ul style="list-style-type: none"> i. Patient history records were not provided when transferred patient from Awala Plantation’s clinic to the clinic in Kango. ii. No data provided by the management on workers’ vaccination. (BCG, Yellow Fever, Typhoid Fever and Hepatitis B) iii. No furniture provided in the new dispensary in Ayeme Bokoue 2. <p>Management Responses:</p> <ul style="list-style-type: none"> i. The Doctor and Assistant of FPIC have confirmed that they passed the referral letter whenever they transferred workers to Kango clinic. ii. The management will check with the authorities on the compulsory vaccination that required by the workers prior submit the data to the department. iii. The management has a Social Contract signed where it stated the company only assisted to construct the dispensary whereas the government will take charge of the personnel and furniture that required. <p>Audit Team Findings:</p> <ul style="list-style-type: none"> i. Seen the referral letter with details of patient history records such as medicine consumed for the past 48 hours and etc. ii. This will be verified during next assessment. iii. No further issue.
<p>6</p>	<p>Issues: Chief of Villagers (Ayeme Bokoue 2, Agricole and etc)</p> <ul style="list-style-type: none"> i. No progress on the ball pump construction for water supply. ii. Need clarification from the management on the national grid construction. iii. Request for the information such as meeting minutes for discuss Social Contract, external RSPO audit report. <p>Management Responses:</p> <ul style="list-style-type: none"> i. The management has been looking for contractor that are reliable for the project. Meanwhile, they have appointed contractor from Cameroon and awaiting for legal procedure to be settled. ii. Olam Palm Gabon was assisting the government on the project and Olam Palm Gabon has to follow the government’s planning on the project. iii. The management has briefed to the populations on the procedure of information request and distributed and displayed the meeting minutes on the notice board in the villages. <p>Audit Team Findings:</p> <ul style="list-style-type: none"> i. This will be verified during the next assessment. ii. No further issue to follow up. iii. Seen the briefing record conducted by Assistant Manager of FPIC, Ms. Gysleine.
<p>7</p>	<p>Issues: Workers’ Delegates, Safety Committee Representatives, Gender Committee Representative</p> <ul style="list-style-type: none"> i. High turbidity of household water. ii. Water disruption without notice. iii. No street light on the way from quarters to sundry shop. <p>Management Responses:</p> <ul style="list-style-type: none"> i. The management has sent the treated water for analysis and the water found that it is safe to consume. ii. They will circular the schedule of water supply to the workers. iii. The management will look into this matter and set up the street light whenever necessary. <p>Audit Team Findings:</p> <ul style="list-style-type: none"> i. The management has sent the treated water for analysis and the water found that it is safe to consume. ii. This will be verified during next assessment.

	iii. No further issue.
8	<p>Issues: Contractors</p> <p>i. They are very happy to work with Olam Palm Gabon. They informed that the payment was made promptly according to the signed contract agreement.</p> <p>Management Responses: The management will continue to make the payment without any delay.</p> <p>Audit Team Findings: Verified the payment records of the contractors confirmed that payment was made according to the agreement where it was paid on every 15th and 30th of the month.</p>

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1328437M1	<p>Requirements Indicator 4.7.2 All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers.</p> <p>Evidence of Nonconformity Water Treatment Plant and Generator set area: i) Risk of electrocution - Life wire connected to the water pump was found on the ground without proper insulation. - Height of the Overhead/aerial line is not sufficient. ii) In the event of fire - No fire extinguisher available at generator set and switchboard room. Camion transport i) Risk assessment for passenger was not identified and only for the driver.</p> <p>Statement of Nonconformity Risk assessment and procedures was not comprehensively covered all operations and activities in the plantation.</p> <p>Corrective Action: Root cause analysis: Risk assessment was conducted during early stage of Awala plantation in October 2013 (refer to Manuel de register des risques). Risks of on-going improvement activities such as instalment of water treatment plant were not assessed. Immediate action: Conduct comprehensive risk assessment revision in Awala Plantation. Assessment shall include all identified risks highlighted during audit. Long term corrective action: 1) Review Manuel de register des risques, include risks highlighted during audit and other risks associated to new activities in Awala e.g. R&D, monthly HCV monitoring</p>	Major

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	<p>by ANPN etc. 2) Revised manual to be submitted by EHS manager and approved by Site Head. 3) After risk evaluation, implement necessary preventive actions:</p> <p>Water Treatment Plant and Generator set area: i) Risk of electrocution - Insulated wiring & Adjust height of the overhead/aerial line ii) In the event of fire - Placement of CO2 fire extinguishers near gen set area and conduct validity / function checking as per schedule. iii) Camion transport - Organize transport/ camion at allocated pick up area especially after working hour, total passengers shall not exceed maximum capacity any time and Procedure de Transport Camion shall be duly followed. iv) Daily check by EHS assistants/ manager on compliance of safety procedure before camion exit from plantation.</p>	
	<p>Assessment Conclusion: The CAP and evidence submitted confirmed that the issue has been fully addressed hence the Major NC was closed satisfactorily on 24/6/2016.</p> <p>During site review, sighted that: Water Treatment Plant and Generator set area: i) Risk of electrocution - the wire that connected to the water pump were in proper insulation. - the height of the Overhead/aerial line is placed in the proper conditions. ii) In the event of fire - The fire extinguishers were available at generator set, switchboard room, boiler room which were valid until 11/2017.</p> <p>Camion transport Risk assessment was updated on 30/4/2017 to include the transport camion.</p> <p>Hence the Major NC remain closed during ASA1.</p>	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1328437N1	<p>Requirements Indicator 4.7.5 Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed.</p> <p>Evidence of Nonconformity Centralised workshop: - One of the first aid box items (spray powder) was expired on November 2015.</p> <p>Statement of Nonconformity Emergency preparedness procedures was not effectively implemented</p>	Minor

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	<p>Corrective Actions Root cause analysis:</p> <ul style="list-style-type: none"> - First aid kits are made available to all team leader/ CDQ (Chef D'Equipes) or person in charge on site. But replacement only based on request by CDQ or person in charge. - Proactive actions are not taken to check availability and validity of all medicines in the first aid kit. <p>Immediate action: Develop checking schedule of first aid kits (and other tools for emergency responses i.e. hydrant, fire extinguisher, emergency shower and spill kit).</p> <p>Long term corrective action plan:</p> <ul style="list-style-type: none"> - Develop monitoring schedule for first aid kits (and other tools for emergency responses i.e. hydrant, fire extinguisher, emergency shower and spill kit). - All equipment to be check once every quarter. - Check all kits and other equipment for emergency response and replace if needed. <p>Assessment Conclusion The CAP has been submitted and accepted on 13/6/2016. Further verifications on CAP implementation and its effectiveness will be done during next surveillance visit. Minor NC remains open.</p> <p>The first aid kits were available at all site visited and the items were found still valid:</p> <ol style="list-style-type: none"> 1. Septimyl – expiry date: 11/2017 2. 70% alcool modifie' – expiry date: 04/2021 3. 80% alcool modifie' – expiry date: 04/2021 4. Gel arnica – expiry date: 04/2021 <p>The corrective action was found effectively implemented. Closed on 21/6/17</p>	
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Non-Conformity		
NCR #	Description	Category (Major / Minor)
1328437N2	<p>Requirements Indicator 5.3.3 A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. As per Environment Standard of Release Prevention and Response Doc. no. E101; Issue 4; Dated 1/4/2016; Minimum Engineering and Administrative Control Requirements:-</p> <ul style="list-style-type: none"> i) Implement the engineering and administrative controls for release prevention a minimum as per Appendix 1 or Comply with local codes and regulations if they are more stringent. <p>Appendix 1 Guidance – Engineering and Administrative Controls for Release Prevention</p> <ul style="list-style-type: none"> ii) Containerised liquids and materials – leak/spill requirements – spill response materials available & appropriate heel chocks and jacks 	Minor

<p>iii) Bulik liquids and solids – leak/spill requirements – secure connections to prevent spills & method to collect minor drips during disconnect or automatic closing valve with dry disconnect</p>	
<p>Evidence of Nonconformity Centralised waste oil storage: - Connections at the containment drain outlet not secured with closing valve Centralised chemical store: - Spill response materials not available during inspection Landfill area: - Oil traces and contamination were noted at the wooden waste store - No proper bunds or oil trap to mitigate any contamination in case of spillage - Spill kit not available during the inspection Scrap yard area: - No containment for engine and hydraulic machinery part which still contain residue oil</p>	
<p>Statement of Nonconformity Waste management and disposal plan to avoid or reduce pollution documented not been implemented.</p>	
<p>Corrective Actions Root cause analysis: Poor implementation of waste management plan. Immediate action: Enhance implementation and follow up of the waste management plan. Long term corrective action plan: - Construct roof over fuel tank to avoid excessive rainfall into retention tanks. Assure good connections between the retention tank and oil separator. Put a closing valve. - Place spill response kits/materials at centralized chemical store. - Improve storage conditions at the landfill area; construct new storage for air filters with cemented ground and bund, spill kit shall be made available on site. - Organize engine and hydraulic machinery part with residue oil into new waste storage area with cemented ground and bund. - Consolidated and appropriate waste management area with cemented ground and bund, especially for scheduled waste such as waste oil, air filter, hydraulic machinery parts, and chemical containers. Spill kit shall be made available on site. - The area to be properly secured.</p>	
<p>Assessment Conclusion The CAP has been submitted and accepted on 21/6/2016. During ASA1, following were verified: a) Closing valve observed at the fuel tank area. Inspection on the oil separator and no oil traces detected. b) Spill kit available at the centralized chemical storage. c) Landfill has been moved to a new location together with the schedule waste store. The new store equipped with the cemented flooring and spill kit. d) Waste oil has been collected and send to the licensed contractor for disposal. No detection of oil stain or spillage at the workshop where the engine and hydraulic machinery part. The corrective action was found effectively implemented. The minor closed on 21/6/17</p>	

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Observation	
OBS #	Description
Not applicable.	

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
1171760M1	Major	4/6/2016	Closed out on 24/6/2016
1328437N1	Minor	4/6/2016	Closed out on 21/6/17
1328437N2	Minor	4/6/2016	Closed out on 21/6/17
1491644-201706-N1	Minor	21/6/17	"Open"

Assessment Conclusion and Recommendation:

Based on the findings during the assessment Awala Palm Oil Mill Certification Unit and supply base complies with the RSPO P&C Gabon-NI March 2017, and the RSPO Supply Chain Certification Standard (Nov 2014) for CPO Mill. It is recommended that the certification of Awala Palm Oil Mill Certification Unit is approved and continued.

Acknowledgement of Assessment Findings	Report Prepared by
Name: Ms Audrey Lee Mei Fong	Name: Mr Hoo Boon Han
Company name: Olam International Limited	Company name: BSI Services Malaysia Sdn Bhd
Title: General Manager, Sustainability	Title: Lead Auditor
Signature:  Date: 8 August 2017	Signature:  Date: 7 August 2017

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance
Principle 1: Commitment to Transparency		
Criterion 1.1 Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow the effective participation in decision making		
1.1.1 There shall be evidence that growers and millers provide adequate information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making -Major compliance-	Adequate information is provided for stakeholders during the new development Awala Plantation through RSPO New Planting Procedure by posting the intention of the new planting on the RSPO website. Information on environmental, social and legal issues relevant to RSPO Criteria was made available to relevant stakeholders for effective participation in decision making.	Complied
1.1.2 Records of the requests for information and responses shall be maintained -Major compliance-	The company has developed a procedure of Management of Applications of Information, Ref. Doc. No.: SOP N°005/CRS-AW (2)/0517, version 1 dated May 2017. Total 12 days to be taken to respond to the request from the stakeholders. Documents that were made publicly available to the stakeholders are such as assessment reports, certificates, SOPs, social contract and etc as stated in the procedure. The Assistant Manager of FPIC has distributed the request information form and briefed to the local communities on the procedure.	Complied
Criterion 1.2 Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.		
1.2.1 Publicly available documents shall include, but are not necessarily limited to: <ul style="list-style-type: none"> • Land titles/user rights (Criterion 2.2); • Occupational health and safety plans (Criterion 4.7); • Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8); • HCV documentation (Criteria 5.2 and 7.3); 	Sustainability (Malaysia & Singapore) and Corporate Responsibility & Sustainability (Gabon) Department will ensure that the following documents are available if requested and they do not impinge on confidentiality and will not cause detrimental sustainability or social outcomes. Among the documents that were made available for viewing are: <ul style="list-style-type: none"> • Land title (held as hard copy by the land department) • Health and safety plan • Plans and impact assessment- environmental 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	<ul style="list-style-type: none"> • Pollution prevention and reduction plans (Criterion 5.6); • Details of complaints and grievances (Criterion 6.3); • Negotiation procedures (Criterion 6.4); • Continual improvement plans (Criterion 8.1); • Public summary of certification assessment report; • Human Rights Policy (Criterion 6.13). <p>-Major compliance-</p>	<ul style="list-style-type: none"> • & social • Pollution prevention plans • Details of complaints and grievances • Negotiation procedures • Continuous improvement plan • Social improvement plan <p>Publicly available documents are as per RSPO requirement. RSPO Policies were also published in company's website as per following address: http://olamgroup.com/sustainability/codes-policies-2/palm-policy-2/</p> <p>In addition to the website, the policies were also displayed at various locations at the operating units including the main notice boards of the estates, mill offices and muster ground notice boards for employees and visitors to view.</p> <p>Records such as information request, complaint and grievances are well documented.</p>	
<p>Criterion 1.3</p> <p>Growers and millers commit to ethical conduct in all business operations and transactions</p>			
1.3.1	<p>There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations</p> <p>-Minor compliance-</p>	<p>The company has developed Code of Conduct documents committing to Gabon dated 30/4/2013. The document has detailed the parties that involved in the Code of Conduct such as employees in the company, suppliers, customers, local communities and etc.</p> <p>Besides, the company has developed Human Rights Policy dated 1/8/2015 where integrity & business ethics was incorporated.</p>	Complied
<p>Principle 2: Compliance with Applicable Laws And Regulations</p>			
<p>Criterion 2.1</p> <p>There is compliance with all applicable local, national and ratified international laws and regulations.</p>			
2.1.1	<p>Evidence of compliance with relevant legal requirements shall be available</p> <p>-Major compliance-</p>	<p>Two certificates of compliance and one Authorization of exploiting have been delivered by DGEPN (the main state environmental administration putting in place and assessing the national environmental politic) are enough to attest the respect of legal requirements:</p> <ul style="list-style-type: none"> - Certificate of Compliance ref. no. 1632/MHUEDD/SG/DGEPN established the 2 August 2011 addressing the environmental and social impact of Kango Palm Oil 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>Plantation</p> <ul style="list-style-type: none"> - Certificate of Compliance ref. no. 1431/MFEPRN/SG/DGEPN established the 02 July 2014 related to the proposed construction of a agro-industrial complex of Owala Plantation - Authorisation of exploiting ref. no. 0741/PMERNFM/SG/DGEPN related to the production of palm oil and palm kernel oil by the company Olam Palm Gabon. Approval date on 27 May 2016. - Approval for dump site within the Bokoue estate dated 28 March 2017; No: 0914/MPERNFM/SG/DGEPN/DEN/SEP <p>Besides, a prescription by Department of General Direction of Environment and Protection (DGEPN) listed all the monitoring, reporting and analysis requirements for the activities in the mill. A summary report which cover monitoring of surface water, air, soil, health & security and employment which need to submit to DGEPN. The latest submission dated March 2017 sighted during onsite visit.</p> <p>For Awala's estate, similar report which cover extra criteria for local communities, biodiversity and waste submitted on march 2017.</p>	
2.1.2	<p>A documented system, which includes written information on legal requirements, shall be maintained.</p> <p>-Minor compliance-</p>	<p>Awala POM and its supply base had documented the Legal requirements & Conventions covering all the necessary regulatory requirements.</p> <p>List was updated in May 2017 and it was aligned with the latest Gabon NI which incorporated the key international laws and conventions.</p> <p>The updating and document management of the required regulations are done by the Legal Department of the Olam Palm Gabon based at Libreville office.</p>	Complied
2.1.3	<p>A mechanism for ensuring compliance shall be implemented.</p> <p>-Minor compliance-</p>	<p>The latest internal audit for Awala Oil Mill, Komo estate and Bokoue estate was conducted from 10-12 October 2016.</p> <p>The 2017 internal audit plan was reviewed to ensure that the mechanism is in place.</p>	Complied
2.1.4	<p>A system for tracking any changes in the law shall be implemented</p> <p>-Minor compliance-</p>	<p>Documented procedure has been established and implemented; refer to Procedure for Legal and Compliance Requirements updated on 30 April 2016.</p> <p>The objective of the procedure is to identify the</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		relevant laws, legal requirements and conventions which applicable to the plantation and mill operation. The process are carry out by the legal department which based in Libreville office of Gabon.	
Criterion 2.2:			
The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights			
2.2.1	Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available. -Major compliance-	<p>The document title "Documents Cartographiques Du Project Palmeraie Olam Palm Gabon" by Ministere Des Eaux Et Forets dated Octobre 2010 was sighted. It was mentioned about the hectarage for lot no 8, no 9, no 11 and "carte des permis forestiers et les zones sollicites par la societe Olam Palm Gabon".</p> <p>There is a Convention addressing concession agreement for long leases signed on November 26th 2010 by The Prime Minister represented Gabonese government and Olam Palm Oil Gabon represented by his General Manager. This document gets provisions on three (03) concessions i.e. Lot 8, Lot 9 and Lot 11. The main applying law is the article 2 alinea 2 from Law 14/63 from 8th May establishing the composition of State's Domain and the rules governing methods of management and alienation. So the period is fixed to 50 years renewable just once for 49 years.</p> <p>Specifically for Awala plantation, the land ownership was from The Gabon Prime Ministry no.001, dated 10 January 2013 for lot 8 : 20,030 Ha</p> <p>Agreement between Government of Gabon and Olam signed by Prime Minister on 26/11/10. Global land use and ownership is for agriculture used.</p> <p>Leased land tenure: 50 years. Max of 99 years.</p> <p>Entire Lot 9 and Lot 11 deemed inappropriate for sustainable development due to overlap with RAMSAR area, both areas have been returned back to the government based on the HCV report during NPP.</p> <p>Lot 9 under RAMSAR area.</p> <p>Rural land: lot 8, Komo Kongo (Awala Plantation), total area 20,030 ha is developed.</p>	Complied
2.2.2	Legal boundaries shall be clearly	In the article 2 of the Convention it has been established that the boundaries and areas are	

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Criterion / Indicator		Assessment Findings	Compliance
	demarcated and visibly maintained. -Minor compliance-	defined as: <ul style="list-style-type: none"> Lot 8 located in Komo Kango department, region of Estuaire the global area is 20.030ha Physical boundary stones is established and maintained on site. Eg: Point no. 1: 00° 00' 24.0" S, 010° 15' 05.0" E Point no. 25: 00° 00' 45.8" S, 010° 15' 02.3" E Point no. 26: 00° 00' 44.8" S, 010° 15' 05.1" E	Complied
2.2.3	Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC). -Major compliance-	There is no land dispute in the certification unit and supply base at the time of audit. The land belongs to Olam Palm Gabon and land ownership documents verified. Besides, there was one complaint case related to the destruction of population's crop during expansion of road access. Please refer to criteria 6.3.2 for details.	Complied
2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved. -Major compliance-	No land conflict was noted. During interview with internal stakeholder and external stakeholders confirmed that no issues related to land conflicts were raised.	Complied
2.2.5	For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). -Minor compliance-	There is no land dispute in the certification unit and supply base at the time of audit.	Complied
2.2.6	To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and planned operations. -Major compliance-	There is no land dispute in the certification unit and supply base at the time of audit.	Complied
Criterion 2.3:			
Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their			

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Criterion / Indicator	Assessment Findings	Compliance	
free prior and Informed consent.			
<p>2.3.1</p>	<p>Maps of an appropriate scale showing the extent of recognised legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities)</p> <p>-Major compliance-</p>	<p>There are villages along the boundary of the plantation such as Ayeme Bokoue, Agricole and etc. The company has maintained a buffer area as indicated in the map.</p>	<p>Complied</p>
<p>2.3.2</p>	<p>Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2.,7.5 and 7.6) shall be available and shall include: a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making; b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken; c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land.</p> <p>-Major compliance-</p>	<p>The company has signed Social Contract through consultation with the local communities and local authorities. There was a revision of Social Contract dated 9/10/2015, version 2 was developed. In the contract, the local communities had requested Olam to construct classroom, quarter for teachers, dispensary and etc. Completed dispensary and quarter for teacher was sighted during site visit and construction of classrooms were under progress as seen during site visit.</p> <p>Interviewed with the local communities and local authorities confirmed that the management has carried out the projects stated in the Social Contract. Meeting to discuss the progress of Social Contract was carried out on quarterly basis.</p>	<p>Complied</p>
<p>2.3.3</p>	<p>All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.</p> <p>-Minor compliance-</p>	<p>The latest version of Social Contract dated 9/10/2015 was available in the French language which understood by the local communities and local authorities. It has been acknowledged by the representative of Chief of Villages and local authorities, Prefect of Gabon and Department of Council</p>	<p>Complied</p>

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2.3.4	Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. -Major compliance-	The latest version of Social Contract dated 9/10/2015 was available in the French language which understood by the local communities and local authorities. It has been acknowledged by the representative of Chief of Villages and local authorities, Prefect of Gabon and Department of Council.	Complied
Principle 3: Commitment to Long-Term Economic and Financial Viability			
Criterion 3.1			
There is an implemented management plan that aims to achieve long-term economic and financial viability			
3.1.1	A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders. -Major compliance-	Awala Plantation (Awala Palm Oil Mill and supply bases) have established and implemented its commitment to long term sustainability and improvements through a capital expenditure programme. Budget and 7 years management plan (projections 2017- 2024) was verified during the audit. Awala Palm Oil Mill and supply bases have made progress towards achieving their performance production targets for the current financial year.Sighted CAPEX for 2017: 1. Workers housing complex – 22 blocks of G10 for Lobe Estate and Komo Estate. 2. Community hall 3. Creche / play school for Awala Plantation	Complied
3.1.2	An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available. -Minor compliance-	There is no replanting since first planting was in February 2012. Replanting will take place after 25 years from the planting date.	Complied
Principle 4: Use of Appropriate Best Practices by Growers and Millers			
Criterion 4.1:			
Operating procedures are appropriately documented, consistently implemented and monitored.			
4.1.1	Standard Operating Procedures (SOPs) for estates and mills shall be documented. -Major compliance-	The SOPs for the mill are documented in "Olam Palm Gabon-Standard Operating Procedure for Palm Oil Mill, dated 24 th April 2015", which consist of 14 SOPs covering all operations including boiler station, power generation station, laboratory, water treatment plant, ETP operation, workshop and maintenance. Additionally, Olam has documented the Integrated Management System Manual (Issue 1, March 2016) that combines all related components of the Olam Quality, Environment, Health and Safety	Complied

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		<p>Management Systems, eg: Fire Safety Management, Materials handling and storage, working at height, confined space entry, safety event investigation, hot work permit, control of contractors, emergency preparedness, waste management, air emissions management, waste reduction, water quality, wastewater management and etc.</p> <p>The SOPs for the estate are documented in "Olam Palm Gabon-Agriculture Policy Manual Version 1 and Version 2", which consist of 20 SOPs covering all operations from land clearing, nursery through to mature palms, harvesting, FFB evacuation, Innovative mechanization practices and etc. In addition, estates have prepared pictorial work instructions for each of the tasks so that the foreign workers understand the work procedures. The estates display SOPs on the notice board at the Muster areas.</p> <p>Standard operating Procedure:</p> <ol style="list-style-type: none"> 1. Oil Palm Replanting, Version 01:2016 2. Oil Palm Fruit Grading, Version 01:2016 3. Oil Palm Harvesting Oil Palm, Version 01:2016 4. Oil Palm Manuring, Version 01:2016 5. Oil Palm Spraying, Version 01:2016 	
4.1.2	<p>A mechanism to check consistent implementation of procedures shall be in place.</p> <p>-Minor compliance-</p>	<p>Internal Audit was conducted once a year by Sustainability department, the latest internal audit was conducted on 10-12/10/2016 for both mill and estates to cover the entire criterion stated in the RSPO standard.</p>	Complied
4.1.3	<p>Records of monitoring and any actions taken shall be maintained and available, as appropriate.</p> <p>-Minor compliance-</p>	<p>All records related to RSPO Internal Audit was maintained and available at Mill and Estate Office.</p>	Complied
4.1.4	<p>The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB).</p> <p>-Major compliance-</p>	<p>Awala Palm Oil Mill continued to maintain and monitor daily record of various source of FFB (from Awala's supply base as well as Olam's other plantation and one outgrower- Agrofor). The records show the origin, weight, transporters details and volume of FFB received through SAP and smart card system.</p>	Complied
<p>Criterion 4.2: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p>			

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4.2.1	<p>There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible.</p> <p>-Major compliance-</p>	<p>Olam Palm Gabon-Agriculture Policy Manual Version 1 and Version 2", which consist of 20 SOPs covering all operations from land clearing, nursery through to mature palms, harvesting, FFB evacuation, Innovative mechanization practices and etc The related SOP, namely Leaf and Soil Sampling procedure was sighted. The leaf sampling analysis is proposed to be conducted once a year while for soil sampling, to be conducted once every 5 years.</p> <p>All estates operate in accordance with the Agriculture Manual and standard operating procedures. The practices consistently monitored by estate operation management and estate inspectorate. The recommendations for improvements are given to maintain the sustainable practices.</p>	Complied
4.2.2	<p>Records of fertiliser inputs shall be maintained.</p> <p>-Minor compliance-</p>	<p>Fertilizers are applied as per agronomist recommendation. Sighted 2nd Report: Annual Agronomic Report- 2016/2017 Fertilizer Recommendation dated November 2016.</p> <p><u>Komo Estate</u></p> <p>The latest application was carried out at Block 61 on June 2017 for Borax (0.1kg/palm).</p> <p><u>Bokoue Estate</u></p> <p>The latest application was carried out at Block 096 on June 2017 for NPK 11(2.5kg/palm). The total tonnage was 8.89 mt.</p>	Complied
4.2.3	<p>There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status.</p> <p>-Major compliance-</p>	<p>The following documents and records were sighted:</p> <ol style="list-style-type: none"> 1. Reports of leave sampling exercise January 2017 2. 2nd Report: Annual Agronomic Report- Palm SAtatus, Leaf Nutrient Survey, Crop production amd 2016/2017 Fertilizer Recommendations in Awala Plantation, Kango, Gabon dated November 2016 3. Reports of leave sampling exercise January 2017 (in progress) 	Complied

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Criterion / Indicator		Assessment Findings	Compliance												
4.2.4	<p>A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting.</p> <p>-Minor compliance-</p>	<p>POME and EFB were applied only in Loboue Estate as per standard operating procedure:</p> <ol style="list-style-type: none"> Chapter 10: Manuring – Organic Fertilizers (Empty Fruit Bunches-EFB). Chapter 14: Palm Oil Mill Effluent (POME) <table border="1"> <thead> <tr> <th>Date</th> <th>Tonnage</th> <th>Type</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>June 17</td> <td>46.5 mt</td> <td>EFB</td> <td>Loboue Estate</td> </tr> </tbody> </table>	Date	Tonnage	Type	Estate	June 17	46.5 mt	EFB	Loboue Estate	Complied				
Date	Tonnage	Type	Estate												
June 17	46.5 mt	EFB	Loboue Estate												
<p>Criterion 4.3 Practices minimize and control erosion and degradation of soils.</p>															
4.3.1	<p>Maps of any fragile soils shall be available.</p> <p>-Major compliance-</p>	<p>Soil map is available. Soil suitability is also included in the EIA report.</p> <p>Soil map was sighted namely Soil Survey report, dated May 2014 by soil survey consultant (PARAM Agriculture Soil Surveys (M) Sdn Bhd).</p> <table border="1"> <thead> <tr> <th>No.</th> <th>Type of Soil</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Bungor</td> </tr> <tr> <td>2</td> <td>Serdang</td> </tr> <tr> <td>3</td> <td>Malau</td> </tr> <tr> <td>4</td> <td>Nami</td> </tr> <tr> <td>5</td> <td>Gajah Mati</td> </tr> </tbody> </table>	No.	Type of Soil	1	Bungor	2	Serdang	3	Malau	4	Nami	5	Gajah Mati	Complied
No.	Type of Soil														
1	Bungor														
2	Serdang														
3	Malau														
4	Nami														
5	Gajah Mati														
4.3.2	<p>A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific).</p> <p>-Minor compliance-</p>	<p>Slope area more than 20° was not planted to avoid erosion following the recommendation from HCV assessment.</p> <p>The area with more than 20° slope is conserve as biodiversity area. Slope below 20° was constructed with conservation terraces.</p> <p>Sighted during site visit the cover crop has been established to avoid bare soil and as part of erosion control. Most of slope area has been completed with cover crop planting.</p> <p>Management strategy, chapter 6: Soil and Water Conservation Methods was established.</p>	Complied												
4.3.3	<p>A road maintenance programme shall be in place.</p> <p>-Minor compliance-</p>	<p>Estates has implemented annual road maintenance programme. Example of programme checked at both estate shows the map indicating road repairs and maintenance for the whole estate roads. The latest road maintenance carried out on June 2017 are as below:</p> <ol style="list-style-type: none"> Komo Estate- block 77 Loboue Estate – block 241 	Complied												
4.3.4	<p>Subsidence of peat soils shall be minimised and monitored. A documented water and ground</p>	<p>There is no peat soil or soil categorised as problematic or fragile soil at both estates.</p>	Complied												

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Criterion / Indicator		Assessment Findings	Compliance
	cover management programme shall be in place. -Major compliance-		
4.3.5	Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. -Minor compliance-	There is no peat soil or soil categorised as problematic or fragile soil at both estates.	Complied
4.3.6	A management strategy shall be in place for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils). -Minor compliance-	There is no peat soil or soil categorised as problematic or fragile soil at both estates.	Complied
Criterion 4.4			
Practices maintain the quality and availability of surface and ground water			
4.4.1	An implemented water management plan shall be in place. -Major compliance-	<p>Awala plantation monitored water quality of incoming/outgoing waters to identify any adverse effect from the mill and estate activities. There is a "Water Management Plan for Awala Plantation" which has been implemented as per procedure (Water Management Procedure and Water Quality Procedure). The plan takes into account the efficient use of resources, ensure amongst other that the use of water did not impact on other users, avoid contamination of ground and surface water, and appropriate treatment of mill effluent. The sampling analysis has been conducted for both incoming/outgoing water and drinking water.</p> <p>Drinking water sampling was done for raw & treated water quality on 1/12/2016 by Societe d'Energie et d'Eau du Gabon (SEEG), Libreville; parameter monitored-: Total Coliform and EscherichiaColiform (EColi), Turbidity, Iron, Manganese and Ammonium. All the parameters were found within the limits.</p> <p>Sampled records of Tubewell water, Incoming/outgoing water analysis, reservoir analysys, and by by Laboratoire Des Roches Et Des Eaux on 20/04/2017; report #0086/2017.</p> <p>The mill has maintained monitoring records of water usage which recorded every day and summarised on monthly basis.</p> <p>Sighted Water Management Plan for Awala Plantation dated June 2015.</p> <p>Consommation d'eau 2016 : site d'Awala Fichier</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance						
		de Suivi: Departement CRS							
4.4.2	<p>Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated</p> <p>-Major compliance-</p>	<p>Rainfall recorded for the year 2015 was 1869.9mm from Jan to Dec 2015. Rainfall recorded from Jan to Dec 2016 was 2195.1mm. Rainfall recorded from Jan to May 2017 was 820.5mm.</p> <p>The latest Effluent BOD monitoring 2017 (final discharge) was done on 04/05/2017 by Laboratoire Des Roches Et Des Eaux and the parameters were shown within the limits.</p> <p>Drinking water sampling was done for raw & treated water quality on 1/12/2016 by Societe d’Energie et d’Eau du Gabon (SEEG), Libreville; parameter monitored-: Total Coliform and EscherichiaColiform (EColi), Turbidity, Iron, Manganese and Ammonium. All the parameters were found within the limits.</p>	Complied						
4.4.3	<p>Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD), shall be in compliance with national regulations (Criteria 2.1 and 5.6).</p> <p>-Major compliance-</p>	<p>No effluent has been discharged since the operation of the mill after commission on 3/8/2015.</p> <p>The latest Effluent BOD monitoring 2017 (final discharge) was done on 04/05/2017 by Laboratoire Des Roches Et Des Eaux and the parameters were shown within the limits.</p>	Complied						
4.4.4	<p>Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored.</p> <p>-Minor compliance-</p>	<p>Awala Mill monitored its water consumption on daily basis for the source of water supply for its mill process usage.</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Water consumed</th> </tr> </thead> <tbody> <tr> <td>2016</td> <td>1.06 m³/mt</td> </tr> <tr> <td>Todate 2017</td> <td>0.96 m³/mt</td> </tr> </tbody> </table>	Year	Water consumed	2016	1.06 m ³ /mt	Todate 2017	0.96 m ³ /mt	Complied
Year	Water consumed								
2016	1.06 m ³ /mt								
Todate 2017	0.96 m ³ /mt								
<p>Criterion 4.5</p> <p>Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques. (IPM).</p>									

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Criterion / Indicator		Assessment Findings	Compliance								
4.5.1	Implementation of Integrated Pest Management (IPM) plans shall be monitored. -Major compliance-	Olam Palm Gabon-Agriculture Policy Manual, Chapter 14 was describe on the integrated pest and disease management practices which includes the planting of beneficial plants and control of damage by rodents, leaf-eaters, orytes and natural enemies. Beneficial plants such as Turnera subulata, Antigonon Leptopus and Cassia Cobanensis are grown in the estates. Records of planting of new areas and maintenance of existing areas of beneficial plants, location maps namely beneficial plant mapping and rynchophorus palm census.	Complied								
4.5.2	Training of those involved in IPM implementation shall be demonstrated. -Major compliance-	Training records for staff and workers on IPM implementation were available and verified to be satisfactory during on-site assessment. <table border="1"> <thead> <tr> <th>Date</th> <th>Training Topic</th> <th>Trainer</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>3/5/17</td> <td>IPM- Rynchophorus phoenicis</td> <td>Agronomist Asssistant</td> <td>Awala Plantation</td> </tr> </tbody> </table>	Date	Training Topic	Trainer	Estate	3/5/17	IPM- Rynchophorus phoenicis	Agronomist Asssistant	Awala Plantation	Complied
Date	Training Topic	Trainer	Estate								
3/5/17	IPM- Rynchophorus phoenicis	Agronomist Asssistant	Awala Plantation								
Criterion 4.6											
Pesticides are used in ways that do not endanger health or the environment											
4.6.1	Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. -Major compliance-	Justification of pesticides applied is available in the Olam Palm Gabon-Agriculture Policy Manual and Standard Operating Procedure for Spraying. The use of pesticide is specific to the target pest, weed and disease. Justification takes consideration to minimize effect on non-target species.	Complied								
4.6.2	Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided. -Major compliance-	Records of pesticides and their active ingredients used, LD50, area treated, amount of a.i. applied per ha, and number of applications was maintained. Sighted the list of chemical that had been register in the "Pesticides Active Ingredients Analysis Per Ha". The type of herbicide use are as follow: <ol style="list-style-type: none"> 1. Ally 20WG 2. Starane 200 3. Garlon 250 4. Roundup <table border="1"> <thead> <tr> <th></th> <th>2016</th> <th>Todate 2017</th> </tr> </thead> <tbody> <tr> <td>Awala Plantation</td> <td>0.33 % a.i/ha</td> <td>0.38 % a.i/ha</td> </tr> </tbody> </table>		2016	Todate 2017	Awala Plantation	0.33 % a.i/ha	0.38 % a.i/ha	Complied		
	2016	Todate 2017									
Awala Plantation	0.33 % a.i/ha	0.38 % a.i/ha									
4.6.3	Any use of pesticides shall be minimised as part of a plan, and in	The quantity of agrochemicals required for various field conditions are documented and justified in									

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Criterion / Indicator		Assessment Findings	Compliance																								
	<p>accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines.</p> <p>-Major compliance-</p>	Standard Operating Procedure for Spraying. The implementation in the field is consistent with the manual. There is no prophylactic use of pesticides.	Complied																								
4.6.4	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimised and eliminated as part of a plan, and shall only be used in exceptional circumstances.</p> <p>-Major compliance-</p>	Awala Plantation did not use the Class 1A and 1B starting from the first planting in February 2012.	Complied																								
4.6.5	<p>Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7).</p> <p>-Major compliance-</p>	<p>Training for both estates was conducted accordingly.</p> <table border="1"> <thead> <tr> <th>Date</th> <th>Training Topic</th> <th>Trainer</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>15/5/17</td> <td>Manuring</td> <td>Agronomist Assistant</td> <td rowspan="3">Komo Estate</td> </tr> <tr> <td>7/4/17</td> <td>Harvesting</td> <td>Agronomist</td> </tr> <tr> <td>10/6/17</td> <td>Spraying</td> <td>Agronomist</td> </tr> <tr> <td>27/3/17</td> <td>Manuring</td> <td>Agronomist Assistant</td> <td rowspan="3">Bokoue Estate</td> </tr> <tr> <td>8/4/17</td> <td>Harvesting</td> <td>Agronomist Assistant</td> </tr> <tr> <td>10/6/17</td> <td>Spraying</td> <td>Agronomist</td> </tr> </tbody> </table>	Date	Training Topic	Trainer	Remarks	15/5/17	Manuring	Agronomist Assistant	Komo Estate	7/4/17	Harvesting	Agronomist	10/6/17	Spraying	Agronomist	27/3/17	Manuring	Agronomist Assistant	Bokoue Estate	8/4/17	Harvesting	Agronomist Assistant	10/6/17	Spraying	Agronomist	Complied
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4.6.6	<p>Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3).</p> <p>-Major compliance-</p>	During visit it was noted that all the remaining pesticides are kept in the store and securely locked. Proper warning signage and ventilation available at the store.	Complied																								
4.6.7	<p>Application of pesticides shall be by proven methods that minimise risk and impacts.</p> <p>-Minor compliance-</p>	The quantity of agrochemicals required for various field conditions were documented and justified in Standard Operating Procedure for Spraying. The implementation in the field was consistent with the procedure.	Complied																								
4.6.8	<p>Pesticides shall be applied aerially only where there is documented</p>	No aerial spraying at all estates.	Complied																								

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Criterion / Indicator		Assessment Findings	Compliance																	
	justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. -Major compliance-																			
4.6.9	Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see Criterion 4.8). -Minor compliance-	There is no associated smallholder at Awala Plantation.	Complied																	
4.6.10	Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3). -Minor compliance-	Proper disposal of waste material are carried out as per the company procedures. The procedures are fully understood by workers and managers. Workers interview reveal that they are aware of the zero burning policy including domestic waste are not allowed to be burned. The management keep the empty containers at in the store and securely locked with cemented floor while domestic waste buried at the landfill.	Complied																	
4.6.11	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. -Major compliance-	Annual medical surveillance for sprayers and pesticide operators were demonstrated. The report namely "Resultats De L'analyse De L'activite Butyrylcholinesterase Chez Les Sujets Sprayers Travillant A Olam Kango-Awala Plantation dated April-May 2017 by Universite Des Sciences De La Sante, Faculte' de Me'decine des Sciences de la Sante' was sighted. <table border="1" data-bbox="699 1469 1216 1814"> <thead> <tr> <th>ID No</th> <th>Date of Medical check up</th> <th>Result</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>B4178511</td> <td>Apr-May 17</td> <td>Normal (Fit to work)</td> <td rowspan="4">Awala Plantation</td> </tr> <tr> <td>B4178508</td> <td>Apr-May 17</td> <td>Normal (Fit to work)</td> </tr> <tr> <td>B3252508</td> <td>Apr-May 17</td> <td>Normal (Fit to work)</td> </tr> <tr> <td>B5426263</td> <td>Apr-May 17</td> <td>Normal (Fit to work)</td> </tr> </tbody> </table>	ID No	Date of Medical check up	Result	Estate	B4178511	Apr-May 17	Normal (Fit to work)	Awala Plantation	B4178508	Apr-May 17	Normal (Fit to work)	B3252508	Apr-May 17	Normal (Fit to work)	B5426263	Apr-May 17	Normal (Fit to work)	Complied
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4.6.12	No work with pesticides shall be undertaken by pregnant or breastfeeding women -Major compliance-	There are no female sprayers at Awala Plantation.	Complied																	

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Criterion / Indicator	Assessment Findings	Compliance
<p>Criterion 4.7 An occupational health and safety plan is documented effectively communicated and implemented.</p>		
<p>4.7.1</p> <p>The health and safety plan shall cover the following: A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored. -Major compliance-</p>	<p>New health and safety policy, issue 2_WD5,document P-04 dated 1/4/16 signed by group MD and CEO of Olam International Limited. Environmental Sustainability Policy, issue2_WD5, document P-02 dated 1/4/16 Quality and food Safety Policy, issue 2_WD5,document P-01 dated 1/4/16 ESH Manual, document ref: OPG-KNG-QSHEMAN-01, rev: 01 approved on 3/3/14. The ESH plan was established namely "Programme HSE Huilerie Awala 2016-2017". The progress of programme was monitored on daily basis by SHO and summarized it in the "Suivi Des Recommandations/ Action 2017" on 16/6/2017. Sampled: 1) Hot Work Permit- Work: Loading Ramp on 20/6/16. 2) Confined Space Entry Permit- Work: clean CPO Tank on Jan 2017, the gas test was carried out by Mill SHO. The equipment was calibrate on 3/8/2016 by the supplier.</p>	<p>Complied</p>
<p>4.7.2</p> <p>All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers. -Major compliance-</p>	<p>The risk assessment was established as per Safety Risk management (S-101.1, Issue 4, Date:1/4/2016). The management was identified and registered the risk and summarized it in the "Awala Palm Oil Mill Risk Assessment" and "Awala Plantation Risk Assessment". Eg: Weighbridge, Loading Ramp, Steriliseur, Pressing Station, Oil Room, Nut Plant at KCP, Boiler, Engin Room, Workshop, Store, ETP, Lab, Forest, Road construction, Spraying, Harvesting, Transportation, Construction, Workshop, Chemical Store and etc.</p>	<p>Complied</p>

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Criterion / Indicator	Assessment Findings	Compliance																																															
<p>4.7.3</p> <p>All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning.</p> <p>-Major compliance-</p>	<p>Training programme planned for year 2017 was consistently implemented. The programme includes training for all categories of workers. Evidence of adequate and appropriate training on safe working practices.</p> <table border="1" data-bbox="699 600 1236 1236"> <thead> <tr> <th>Date</th> <th>Training Topic</th> <th>Trainer</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>24/2/2017</td> <td>Safety Driving</td> <td>Safety Mgr</td> <td rowspan="7">Awala Mill</td> </tr> <tr> <td>31/3/2017</td> <td>Chemical Handling</td> <td>SHO</td> </tr> <tr> <td>2/3/2017</td> <td>Fire evacuation</td> <td>Fire Depart</td> </tr> <tr> <td>21/01/2017</td> <td>RSPO training</td> <td>RSPO Mgr</td> </tr> <tr> <td>17/01/2017</td> <td>5S</td> <td>Mill Mgr</td> </tr> <tr> <td>9/2/2017</td> <td>Manual Handling</td> <td>SHO</td> </tr> <tr> <td>7/6/2017</td> <td>QEHS Induction</td> <td>SHO</td> </tr> <tr> <td>15/5/17</td> <td>Manuring</td> <td></td> <td rowspan="2">Komo Estate</td> </tr> <tr> <td>7/4/17</td> <td>Harvesting</td> <td>Agronomist</td> </tr> <tr> <td>10/6/17</td> <td>Spraying</td> <td>Agronomist</td> <td rowspan="3">Bokoue Estate</td> </tr> <tr> <td>27/3/17</td> <td>Manuring</td> <td>Agronomist Assistant</td> </tr> <tr> <td>8/4/17</td> <td>Harvesting</td> <td>Agronomist Assistant</td> </tr> <tr> <td>10/6/17</td> <td>Spraying</td> <td>Agronomist</td> <td></td> </tr> </tbody> </table>	Date	Training Topic	Trainer	Remarks	24/2/2017	Safety Driving	Safety Mgr	Awala Mill	31/3/2017	Chemical Handling	SHO	2/3/2017	Fire evacuation	Fire Depart	21/01/2017	RSPO training	RSPO Mgr	17/01/2017	5S	Mill Mgr	9/2/2017	Manual Handling	SHO	7/6/2017	QEHS Induction	SHO	15/5/17	Manuring		Komo Estate	7/4/17	Harvesting	Agronomist	10/6/17	Spraying	Agronomist	Bokoue Estate	27/3/17	Manuring	Agronomist Assistant	8/4/17	Harvesting	Agronomist Assistant	10/6/17	Spraying	Agronomist		<p>Complied</p>
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<p>4.7.4</p> <p>The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded.</p> <p>-Major compliance-</p>	<p>OSH Committees meeting conducted 2 month/once and meeting minutes includes issues raised and action taken form workplace inspection report etc. The discussion on the accident review, workplace inspection, safety improvement plan, issues from workers, training, complaints has been discussed and action to be taken. There was no major issue.</p> <p><u>Awala Palm Oil Mill</u></p> <p>SHC organization chart for 2017</p> <p>i) Chairman – Head QHSE</p> <p>ii) Secretary – QHSE Mgr (Plantation) and SHO (Mill)</p> <p>(Minutes dated 8/3/2017 was sighted)</p> <p><u>Awala Plantation</u></p> <p>SHC organization chart for 2017</p> <p>i) Chairman – GM</p> <p>ii) Secretary – Finance Exec</p> <p>(Minutes dated 7/3/2017was sighted)</p> <p><u>QHSE Annual Meeting</u></p>	<p>Complied</p>																																															

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Criterion / Indicator		Assessment Findings	Compliance									
		Date: 22/3/2017 Minutes: QHSE activities, training & awareness programme, QHSE budget, key result perspectives & projects, EHS plan, Incident/Accident.										
4.7.5	Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed. -Minor compliance-	Accident and emergency procedures have been communicated to employees, contractors and visitors. Fire drill and Fire evacuation drill was last conducted on 18/3/17 to test the state of readiness during emergency situation. Workers trained in First Aider were present in the mill and field operations which was last conducted on 18/3/2017. This fire drill and first aid training was conducted by Gabonese Fire Department.	Complied									
4.7.6	All workers shall be provided with medical care, and covered by accident insurance. -Minor compliance-	Medical care is provided to all the employees. Local workers are covered under Caisse Nationale de Securite Sociale (C.N.S.S) scheme while foreign workers are covered under Great Eastern Insurance. <table border="1"> <thead> <tr> <th>Insurance</th> <th>Period</th> <th>Remark</th> </tr> </thead> <tbody> <tr> <td>Great Eastern (Policy No: G0003698)</td> <td>1/1/17–31/12/17</td> <td>Plantation/Mill</td> </tr> <tr> <td>CNSS scheme</td> <td>May 2017</td> <td>Plantation/Mill</td> </tr> </tbody> </table>	Insurance	Period	Remark	Great Eastern (Policy No: G0003698)	1/1/17–31/12/17	Plantation/Mill	CNSS scheme	May 2017	Plantation/Mill	Complied
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CNSS scheme	May 2017	Plantation/Mill										
4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics -Minor compliance-	Records on Lost Time Accident (LTA) metrics were maintained. The accident statistic as shown below: <table border="1"> <thead> <tr> <th>Year</th> <th>Awala Mill</th> <th>Awala Plantation</th> </tr> </thead> <tbody> <tr> <td>2016</td> <td>17</td> <td>704</td> </tr> <tr> <td>2017 (as at May 2017)</td> <td>75</td> <td>226</td> </tr> </tbody> </table> *LTA is equivalent to lost man days	Year	Awala Mill	Awala Plantation	2016	17	704	2017 (as at May 2017)	75	226	Complied
Year	Awala Mill	Awala Plantation										
2016	17	704										
2017 (as at May 2017)	75	226										
Criterion 4.8												
All staff, workers, smallholders and contract workers are appropriately trained.												

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Criterion / Indicator		Assessment Findings	Compliance																																														
4.8.1	<p>A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme.</p> <p>-Major compliance-</p>	<p>Training programme planned for year 2017 was consistently implemented. The programme includes training for all categories of workers. Evidence of adequate and appropriate training on safe working practices.</p> <table border="1"> <thead> <tr> <th>Date</th> <th>Training Topic</th> <th>Trainer</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>24/2/2017</td> <td>Safety Driving</td> <td>Safety Mgr</td> <td rowspan="8">Awala Mill</td> </tr> <tr> <td>31/3/2017</td> <td>Chemical Handling</td> <td>SHO</td> </tr> <tr> <td>2/3/2017</td> <td>Fire evacuation</td> <td>Fire Depart</td> </tr> <tr> <td>21/01/2017</td> <td>RSPO training</td> <td>RSPO Mgr</td> </tr> <tr> <td>17/01/2017</td> <td>5S</td> <td>Mill Mgr</td> </tr> <tr> <td>9/2/2017</td> <td>Manual Handling</td> <td>SHO</td> </tr> <tr> <td>7/6/2017</td> <td>QEHS Induction</td> <td>SHO</td> </tr> <tr> <td>15/5/17</td> <td>Manuring</td> <td></td> <td rowspan="3">Komo Estate</td> </tr> <tr> <td>7/4/17</td> <td>Harvesting</td> <td>Agronomist</td> </tr> <tr> <td>10/6/17</td> <td>Spraying</td> <td>Agronomist</td> </tr> <tr> <td>27/3/17</td> <td>Manuring</td> <td>Agronomist Assistant</td> <td rowspan="3">Bokoue Estate</td> </tr> <tr> <td>8/4/17</td> <td>Harvesting</td> <td>Agronomist Assistant</td> </tr> <tr> <td>10/6/17</td> <td>Spraying</td> <td>Agronomist</td> </tr> </tbody> </table>	Date	Training Topic	Trainer	Remarks	24/2/2017	Safety Driving	Safety Mgr	Awala Mill	31/3/2017	Chemical Handling	SHO	2/3/2017	Fire evacuation	Fire Depart	21/01/2017	RSPO training	RSPO Mgr	17/01/2017	5S	Mill Mgr	9/2/2017	Manual Handling	SHO	7/6/2017	QEHS Induction	SHO	15/5/17	Manuring		Komo Estate	7/4/17	Harvesting	Agronomist	10/6/17	Spraying	Agronomist	27/3/17	Manuring	Agronomist Assistant	Bokoue Estate	8/4/17	Harvesting	Agronomist Assistant	10/6/17	Spraying	Agronomist	Complied
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4.8.2	<p>Records of training for each employee shall be maintained.</p> <p>-Minor compliance-</p>	All records of training were maintained and available at Awala Plantation-Main Office.	Complied																																														
<p>Principle 5: ENVIRONMENTAL RESPONSIBILITY AND CONSERVATION OF NATURAL RESOURCES AND BIODIVERSITY</p>																																																	
<p>Criterion 5.1</p> <p>Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.</p>																																																	
5.1.1	<p>An environmental impact assessment (EIA) shall be documented.</p> <p>-Major compliance-</p>	All the environmental aspects and impacts have been identified in the Management Plan of the Environmental and Social which prepared by Terre Environmental Development on June 2014.	Complied																																														
5.1.2	<p>Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for</p>	There is no change of current practices required to mitigate negative effects based on identified impacts for both the mill and estates.	Complied																																														

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	change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons. -Minor compliance-	In POM, management plan of the environmental and social which prepared by Terre Environmental Development on June 2014 has identified different aspect, impacts and mitigation measures for different activities. For estates, social and management plan which updated on May 2016 has incorporated source of impact, impact, mitigation measures, indicator, responsible personal and completion date.	
5.1.3	This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts. -Minor compliance-	A prescription by Department of General Direction of Environment and Protection (DGEPN) listed all the monitoring, reporting and analysis requirements for the activities in the mill. A summary report which cover monitoring of surface water, air, soil, health & security and employment which need to submit to DGEPN. The latest submission dated March 2017 sighted during onsite visit. For Awala's estate, similar report which cover extra criteria for local communities, biodiversity and waste submitted on march 2017. For example: a. Chimney emission of boiler monitoring report documented on daily basics. Records on 15 May 2017 sighted during onsite audit. b. Latest effluent analysis report dated 20 April 2017 by government laboratories. The analysis conducted on every 3 monthly basics.	Complied
Criterion 5.2			
The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced.			
5.2.1	Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). -Major compliance-	A joint HCV assessment was conducted by Proforest and TERE A with an initial scoping assessment beginning February 2011. The assessment was conducted by HCV assessment team consisted of 21 persons comprising 5 sociologists, 2 ichthyologists, an ornithologist, and 3 ecologists and 9 botanical and mammalian experts as well as a GIS expert. The Global HCV toolkit and the draft HCV National Interpretation Document for Gabon were used. It was identified HCV 1.1, 1.2, 1.4, 2, 4.1, 5 and 6 within the concession area. Management and monitoring plans were	Complied

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		developed based on the HCV consultants' recommendations and these were inspected during the field visit and document review.	
5.2.2	<p>Where rare, threatened or endangered (RTE) species, HCVs, or legally protected species or areas are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan.</p> <p>-Major compliance-</p>	<p>HCV Management Action plan which updated in April 2017 described the management objectives, type of HCV, threats, mitigation measures and monitoring indicator. The action plan has been develop according to the HCV Assessment conducted in Feb 2011.</p> <p>Various management program has been established for the identified HCV area. For example, in total 5 patrol will be organised in the month of April, June, August, October and December to all the HCV area. Report generate for each patrolling recording observation onsite, such as animal trap or fauna observed. The latest report patrol report (224/ANPN/SE/DR/PNP) conducted from 11 April 2017 to 21 April 2017 sighted during onsite.</p> <p>Signage's are erected and placed at the field to create awareness and individuals/employees are notified of the HCV area to ensure that no illegal hunting is carried out within the Awala Concession.</p>	Complied
5.2.3	<p>There shall be a programme to regularly educate the workforce about the status of these RTE, HCV or protected species and habitats, and appropriate disciplinary measures shall be instigated in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species.</p> <p>-Minor compliance-</p>	<p>There are yearly training program has been established for all the internal (mill, estates, workshop & administrations) and external (contractors and villagers) stakeholders. There are two main training program which are protected species and protection of buffer zone.</p> <p>Training program and attendance sighted during site visit. For example:</p> <ol style="list-style-type: none"> Latest training regarding protected species for Komo estate conducted on 26 May 2017. Latest training regarding buffer zone for Lobe estate dated 06 April 2017. 	Complied
5.2.4	<p>Where a management plan has been created there shall be ongoing monitoring:</p> <ul style="list-style-type: none"> The status of HCV, RTE and protected species and areas that are affected by plantation or mill operations shall be documented and reported; Outcomes of monitoring shall be fed back into the management plan. <p>-Minor compliance-</p>	<p>A patrol team containing 6 members- 2 from ANPN (National Park Agency), 2 from Ministry of Forestry and 2 from Olam Palm Gabon will patrol the HCV area every 2 months. It will prevent the illegal logging and hunting activities. Report generate for each patrolling recording observation onsite, such as animal trap or fauna observed. The latest report patrol report (224/ANPN/SE/DR/PNP) conducted from 11 April 2017 to 21 April 2017 sighted during onsite.</p> <p>During the site visit to the HCV North area of Komo estate, it was noted that signage's discouraging any illegal hunting are placed around the HCV area in the field and are well maintained. The HCV North size is 11,045 ha and no evidence</p>	Complied

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		of degradation during site visit. Villagers with authorization still able to access the HCV area for hunting which identified under HCV5.	
5.2.5	Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. -Minor compliance-	Total 11,045 ha which identified as the HCV 5 under HCV North area of Komo estate for the local communities for their activities such as hunting, fruit harvesting and fishing. Interviewed the villagers and they were authorized with the badges for hunting activities in the HCV areas. The permit stated the rules & regulation, signature of the chief and Olam stamp. The villager also satisfied with the control as it will restrict the stranger from other places access to their area.	Complied
Criterion 5.3:			
Waste is reduced, recycled, re-used and disposed in an environmentally and socially responsible manner.			
5.3.1	All waste products and sources of pollution shall be identified and documented. -Major compliance-	In POM, the list of activities, types of waste, location, elimination relating to operations are documented. The activities such as maintenance, office, boiler room and treatment plant. The waste identification updated on 5 May 2017 The pollution sources are provided in the Waste Management Improvement Plan.	Complied
5.3.2	All chemicals and their containers shall be disposed of responsibly. -Major compliance-	In POM, the empty engine oil and lubricant container which used for genset and machinery are kept in the schedule waste store. As per the new contract in 2017 of the company issue to the oil supplier, all the used oil need to collect back by the supplier. Up to date, no chemical container being disposed. Waste register list out the waste, quantity, area and person in charge. The container shredder has been purchased for shredding the empty container.	Complied
5.3.3	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. -Minor compliance-	Waste Management Plan (MOI-DS-02) dated 01 Feb 2016 had identified the source of the waste & pollution and management plan. For domestic waste will send to the landfill located in the estate which has been approved by the local council (dated 28 March 2017; No: 0914/MPERNFM/SG/DGEPN/DEN/SEP). Stores for scheduled waste located just beside the landfill were inspected at Bokoue estate. Label for different scheduled waste sighted at the store such as chemical container, oil filter and etc. Waste oil disposal record dated 25 April 2016 by the authorized company (certificate no: 00822; approved on 15 Nov 2016) sighted during onsite	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		visit.	
Criterion 5.4:			
Efficiency of fossil fuel use and the use of renewable energy is optimized.			
5.4.1	<p>A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored.</p> <p>-Minor compliance-</p>	<p>The POM generates electricity from genset using diesel. The energy generated from Awala Mill will powers the mill operations, offices within the mill vicinity and workshop.</p> <p>The monthly diesel and fibre utilization are being monitored and recorded. For example:</p> <p>a. Jan: 18.10 Diesel /CPO Ltr/Tonnes; 0.60 palm products/CPO Tonnes.</p> <p>b. Feb: 18.37 Diesel /CPO Ltr/Tonnes; 0.59 palm products/CPO Tonnes.</p> <p>c. Mar: 13.74 Diesel /CPO Ltr/Tonnes; 0.59 palm products/CPO Tonnes.</p> <p>For the total three estates, monitoring of fossil fuel vs FFB production 2017 as below:</p> <p>a. Jan: 35.6 liter/tonnes</p> <p>b. Feb: 34.6 liter/tonnes</p> <p>c. Mar: 27.8 liter/tonnes</p>	Complied
Criterion 5.5:			
Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.			
5.5.1	<p>There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions.</p> <p>-Major compliance-</p>	<p>Olam Sustainable Palm Policy which approved on February 2017 described no use of fire in land preparation, including planting and replanting. It also in-lined with the "Land Clearing and Preparation" section 2.5 of Olam Agricultural Manual and it was implemented throughout the land clearing and planting operation.</p> <p>All the new planting in Awala completed in December 2016.</p> <p>During the field assessment, no evidence of burning can be observed for preparing a new planting land.</p>	Complied
5.5.2	<p>Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other</p>	<p>No fired used for preparing of land for new planting. All the new planting in Awala completed in December 2016.</p> <p>This could be observed at Bokoue and Komo estate during field assessments.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	regions -Minor compliance-		
Criterion 5.6: Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.			
5.6.1	An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4) -Major compliance-	Based on the assessment of all polluting activities as of the Environment Aspect and Impact assessment, various emission and effluent monitoring as below: a) The latest Effluent BOD monitoring 2017 (final discharge) was done on 04/05/2017 by Laboratoire Des Roches Et Des Eaux and the parameters were shown within the limits. b) Monitoring of the GHG quantity was done through RSPO PalmGHG Calculator Version 3.0.1.	Complied
5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. -Major compliance-	For the estate, GHG emissions identified including CO _x , SO _x and NO _x from various sources including fossil fuel, chemical, peat oxidation, sinks, crop sequestration, fertilizer consumptions and sequestration in conservation area. For mill, GHG emission identified from POME, fuel consumption and grid electricity utilization. Emission recorded based on RSPO GHG calculator, OPG achieved net sequestration through conservation set asides.	Complied
5.6.3	A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools. -Minor compliance-	In Awala palm oil mill, the monitoring of oil trap is not implemented effectively. Rubbish and oil trace were observed at both oil traps. The gate valve did not closed as oil trace detected at the outlet of the oil trap. Monitoring of the GHG quantity was done through RSPO PalmGHG Calculator Version 3.0.1 is used and the management opted for full version was applied. The report prepared on 22 Jan 2017. These GHG calculations were done as per certification unit basics including 3 estate and mill. Summary emissions: a. Emission/ mt CPO= -35.97 tCO ₂ e/mt CPO b. Emission/ mt PK= -35.97 tCO ₂ e/mt PK Details of GHG calculation can be found under Appendix K: GHG Reporting Executive Summary.	Minor nonconformance

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Principle 6: RESPONSIBLE CONSIDERATION OF EMPLOYEES AND OF INDIVIDUALS AND COMMUNITIES AFFECTED BY GROWERS AND MILLERS			
Criterion 6.1:			
Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.			
6.1.1	A social impact assessment (SIA) including records of meetings shall be documented. -Major compliance-	The company has conducted social impact assessment by the TEREAs on December 2010 before new planting was carried out. The SIA assessment was based on government regulations and by the government approved assessors through a series of stakeholder consultations. Besides, the company has conducted a quarterly meeting with local authorities and local people to discuss if there is any issues reported. The last meeting was conducted on 24/2/2017. Meeting minutes was sighted and interviewed with the participants confirmed that they have been invited to the meeting.	Complied
6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. -Major compliance-	The SIA assessment conducted has involved the participation of different stakeholders such as local communities, NGOs and government authorities. This has been verified through interviewed with the local authorities and local communities that they have been involved in the assessment.	Complied
6.1.3	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation. -Major compliance-	The management plan has been developed on May 2016. The plan has incorporated the impacts, measure to be taken, person in charge and time frame.	Complied
6.1.4	The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. -Minor compliance-	The management plan will be reviewed when deem necessary. The last reviewed was conducted on May 2016.	Complied
6.1.5	Particular attention shall be paid to	Not applicable. No scheme smallholder under	

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	the impacts of smallholder schemes (where the plantation includes such a scheme). -Minor compliance-	Awala plantation.	Not applicable
Criterion 6.2			
There are open and transparent methods for communication and consultation between growers and/or millers, local Communities and other affected or interested parties.			
6.2.1	Consultation and communication procedures shall be documented -Major compliance-	The Consultation and Communication Procedures is developed with the Ref. Doc. No. SOP N° 003/CRS-AW (2)/ 0116, Version 2, dated January 2016 clearly explained the procedure of communication and consultation.	Complied
6.2.2	A management official responsible for these issues shall be nominated. -Minor compliance-	The RSPO Manager, Mr. Dao Mahamadou and Assistant Manager FPIC, Ms. Gysleine Milebe are responsible person onsite for any social issues including communication with stakeholders.	Complied
6.2.3	A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained -Minor compliance-	Stakeholder list was available and updated on March 2017 where authorities, local communities, contractors and NGOs were included into the list. The management has conducted meeting with the local authorities and local communities on quarterly basis to discuss the progress of matters in the Social Contract, version 2 dated 9/10/2015 which signed on 19 June 2015. The meeting was conducted on 24/2/2017. Meeting minutes was sighted with the progress of the activities had been updated in the minutes. For example: The company has constructed one dispensary and one house for teacher at Ayeme Bokoue 1 village. Site visit has confirmed that the dispensary and houses were constructed completely.	Complied
Criterion 6.3			
There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.			
6.3.1	The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested.	The company has developed procedure of Management of Complaints and Claims (Doc. No.: SOP N°07/CRS-AW (3)/0417, version 03, date of revision: April 2017) to address any dispute or grievances from internal and external stakeholders. The company will need to make decision of the complaints within 14 days. Besides,	Complied

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	-Major compliance-	the company has distributed the complaint form to all the villagers in case they have any complaint to lodge.	
6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available. -Major compliance-	Olam Palm Gabon has implemented a software system, SocProg to register and monitor if there is any complaints from the local communities and external parties. Objective evidences will be uploaded into the system and once complaint resolved, it shown "Closed" in the system. Seen the Grievance Reports where all the complaints were closed. Only one complaint, Grievance No.: 193-11-2016 was lodged since last audit from Ayeme Bokoue 2 village due to crop (banana) destruction during the expansion of road access. The company has compensated total 25,000 CFA francs for her loss according to Decree n° 1016-PR dated 24/8/2011 –Compensation for the destruction of livestock, culture and building for breeding. She has accepted the compensation and acknowledged on the payment on 22/12/2016. Thus, the complaint was closed. Interviewed with the local communities, contractors and workers confirmed that they understand the procedure to lodge complaint.	Complied
Criterion 6.4			
Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
6.4.1	A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. -Major compliance-	The company has developed a procedure for Identification of Legal and Customary Right with Doc. No. SOP N° 002/CRS-AW(2)/0116, version 2 dated January 2016. The procedure has clearly explained the stages of the process if there is any land dispute.	Complied
6.4.2	A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups'	The management has adopted the Decree n° 1016-PR dated 24/8/2011 for any compensation of destruction of plantations, culture and building of breeding for the population. For example: Grievance No.: 193-11-2016 was lodged since last audit from Ayeme Bokoue 2 village due to crop (banana) destruction during the expansion of road access. The company has compensated total 25,000 CFA francs for her loss according to Decree n° 1016-PR dated 24/8/2011 – Compensation for the destruction of livestock, culture and building for breeding. She has accepted the compensation and acknowledged on	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	proof of legal versus communal ownership of land. -Minor compliance-	the payment on 22/12/2016.	
6.4.3	The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available -Major compliance-	The records for the compensation of the population was sighted and maintained according to the procedure.	Complied
Criterion 6.5			
Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.			
6.5.1	Documentation of pay and conditions shall be available. -Major compliance-	The mill and estates consist of local workers and foreign workers. The management has included basic pay, net pay, gross pay, deduction of salary, lodgement allowance, holiday pay and etc on the pay slip. Sampled of payslip based on the summary of crop production (low crop month, peak crop month and latest month). Payslip of month July 2016, November 2016 and May 2017 was sampled as below: <ul style="list-style-type: none"> a. Employee ID: 002290 (APOM) b. Employee ID: 001897 (APOM) c. Employee ID: 0019542 (APOM) d. Employee ID: 002505 (APOM) e. Employee ID: 005795 (KE) f. Employee ID: 033551 (KE) g. Employee ID: 017807 (KE) h. Employee ID: 001819 (KE) i. Employee ID: 002251 (BE) j. Employee ID: 024487 (BE) <p>All the sampled workers were achieved minimum wage of 150,000 CFA francs per month.</p>	Complied
6.5.2	Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official. -Major compliance-	Employment contract are available in language (French and Bahasa Indonesian) that understood by workers. The contract has detailing the payments and employment conditions such as period of working, working hour, annual leave, termination of services and etc. The contract was signed by the employees and sampled contracts as below: <ul style="list-style-type: none"> a. Employee ID: 001897 (APOM) b. Employee ID: 034982 (APOM) c. Employee ID: 041764 (KE) d. Employee ID: 036707 (KE) e. Employee ID: 001819 (KE) f. Employee ID: 041908 (BE) 	Complied

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		g. Employee ID: 002087 (BE) h. Employee ID: 034463 (BE)	
6.5.3	Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. -Minor compliance-	The company has provided free workers' quarter, water supply and electricity to the workers. Few blocks of new housing are under construction at the estates and seen the construction is under progress during site visit. Besides, the company provide clinic facility inside the plantation for the workers and their family. Kindergarten was established inside the compound as well. Besides, the company has constructed dispensary and classroom in the neighbouring villages. The company also provide free transportation to send the workers and kids to work and school.	Complied
6.5.4	Growers and millers shall make demonstrable efforts to monitor and improve workers' access to adequate, sufficient and affordable food. -Minor compliance-	Sundry shop was found established in the plantation's compound. The price was clearly displayed on the goods. Besides, the workers also will purchased their daily goods from the nearest town, Kango.	Complied
Criterion 6.6			
The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.			
6.6.1	A published statement in local languages recognising freedom of association shall be available. -Major compliance-	The company has developed Human Rights Policy dated 1/8/2015 where the company does not interfere with the employees' rights to form or join unions or other associations of their own choice and to bargain collectively.	Complied
6.6.2	Minutes of meetings with main trade unions or workers' representatives shall be documented. -Minor compliance-	The workers have formed an association called COSINEQ through the election of the delegates by all the workers on 23/1/2016. There are total 12 delegates from Bokoue Estate, Lobe Estate, Komo Estate and mill. The meeting was conducted on twice a month basis and the last meeting was conducted on 22/5/2017. Seen the Claim Notebook where all the issues raised during the meeting was recorded in the notebook.	Complied
Criterion 6.7			
Children are not employed or exploited.			
6.7.1	There shall be documentary evidence that minimum age requirements are met. -Major compliance-	The company has developed Human Rights Policy dated 1/8/2015 where Olam does not engaged the use of child labour. The minimum age to be employed by the company was above 18 years old as stated in the Code of Conduct document dated	Complied

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		30/4/2013. Seen the List of Workers confirmed that no workers were employed below 18 years old.	
Criterion 6.8			
6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. -Major compliance-	The company has developed Human Rights Policy dated 1/8/2015 where all the employees were free from discrimination as well as it stated in the Code of Conduct version 30/4/2013 .	Complied
6.8.2	Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. -Major compliance-	The management has recruited employees of different nationalities and gender. No discrimination was sighted based on interview with the workers. The management treated all the workers fairly and equally without discrimination.	Complied
6.8.3	It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. -Minor compliance-	The company has developed procedure of Internal Recruitment of Foreign Workers with Ref. Doc. No. 001/03/2016/RH/GT, version 1 dated March 2016. The procedure has explained the process of recruitment of expatriate. The recruitment process is accordance to Gabon Labour Code Act 3/94 of 21 November 1994, Article 104 – 109.	Complied
Criterion 6.9			
There is no harassment or abuse in the work place, and reproductive rights are protected.			
6.9.1	A policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. -Major compliance-	The company has developed Human Rights Policy dated 1/8/2015 where discrimination and harassment or abuse in the workplace is prohibited. Besides, Olam also committed to tolerate no kind of harassment included sexual harassment in workplace. It has been stated in the Code of Conduct document version 30/4/2013.	Complied
6.9.2	A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. -Major compliance-	Human Rights Policy dated 1/8/2015 was implemented where the company provides an environment that free from discrimination and harassment or abuse in workplace, and reproductive rights are protected.	Complied
6.9.3	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established,	The last meeting was conducted on 6-9/6/2017 with the participation of the women's representative from the three estates and mill. During the meeting, the person in charge has	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	implemented, and communicated to all levels of the workforce -Minor compliance-	explained the objective of the establishment of committee, definition of sexual harassment and discrimination as well as the channel to report if there is any case happened. Through interview with the committee confirmed that there have no any issue reported thus far. Besides, the company has developed a Claim Note form for the workers to report for any miscalculation of the payment of salary.	
Criterion 6.10			
Growers and millers deal fairly and transparently with smallholders and other local businesses.			
6.10.1	Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available. -Minor compliance-	The mill has purchased FFB from a smallholder and its own plantations. The pricing was displayed at the weighbridge area.	Complied
6.10.2	Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented (where these are under the control of the mill or plantation). -Major compliance-	Only one smallholder has sent their FFB to Awala POM and seen the agreement for Supply of FFB with Agreement No.: FFB/2017/05/00001 which signed on 15/5/2017. The agreement is valid for one year. Pricing mechanism was clearly stated in Annexure 1 of the agreement. The price of FFB paid to smallholders is in accordance with the price determined by CIF Rotterdam price of CPO & USD exchange rate.	Complied
6.10.3	Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. -Minor compliance-	Contract of Execution of Work was signed by the contractors before the commencement of work. Sampled letters as below: a. Contractor: SPA Multiservices for the construction of housing which acknowledged by the contractor on 10/5/2017. b. Contract No.: N°001/OPGK/E.G.E.A/03-04-2017 for supply labour to carry out decreeping, slashing, manuring and etc commenced on 3/4/2017 for 3 months. c. Contract No.: N°001/OPGK/JARDINS O/14-03-2017 for supply labour on loose fruits collection, pruning and etc commenced on 14/3/2017 for 3 months. d. Contract No.: ESE-2015-08 dated 1/3/2016 for the construction of 12 new blocks of quarter in Awala Plantation. The payment period was clearly stated in the contract agreement signed by the contractors.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
6.10.4	Agreed payments shall be made in a timely manner. -Minor compliance-	Payment was made promptly according to the contract agreement. Verified with the contractors confirmed that the management did not delay any payment of the contractors. Seen the bank voucher that the company has paid the contractors on twice a month which is on the 15 th and 30 th of the month.	Complied
Criterion 6.11 Growers and millers contribute to local sustainable development where appropriate.			
6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. -Minor compliance-	The company has signed a Social Contract with the local communities to develop the villages such as: <ul style="list-style-type: none"> a. Construction of School b. Construction of housing for teachers c. Provide employment opportunities to the local people d. Provide free medical assistance to the workers e. Site visit confirmed that the construction of new workers' quarter and classroom for villagers was under progress. 	Complied
6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. -Minor compliance-	There is no any local scheme smallholders involved in Awala Plantation operation.	Not applicable
Criterion 6.12 No forms of forced or trafficked labour are used.			
6.12.1	There shall be evidence that no forms of forced or trafficked labour are used. -Major compliance-	The company has implemented Human Rights Policy dated 1/8/2015 where Olam does not participate in any form of forced labour or human trafficking. The company will ensure the employees have the freedom of movement during the course of their employment. Through interview with the workers confirmed that no force labour is practice in Olam. Verified the contract of employment for the national and foreign workers and acknowledgement was sighted from the workers. Besides, seen the work permit for the foreign workers (Indonesian) and sampled as below: <ul style="list-style-type: none"> a. Employee ID: 50022507 with Permit No. N°01839 valid until 1/7/2017 b. Employee ID: 50022503 with Permit No. N°01846 valid until 1/7/2017 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>c. Employee ID: 50022484 with Permit No. N°01838 valid until 1/7/2017</p> <p>d. Employee ID: 50022740 with Permit No. N°04025 valid until 17/9/2017</p>	
6.12.2	<p>Where applicable, it shall be demonstrated that no contract substitution has occurred.</p> <p>-Minor compliance-</p>	<p>Interviewed with the foreign and national workers confirmed that they signed contract with Olam Palm Gabon without any substitution of contract.</p>	Complied
6.12.3	<p>Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented.</p> <p>-Major compliance-</p>	<p>The company has developed procedure of Internal Recruitment of Foreign Workers with Ref. Doc. No. 001/03/2016/RH/GT, version 1 dated March 2016. The procedure has explained the process of recruitment of expatriate. The recruitment process is accordance to Gabon Labour Code Act 3/94 of 21 November 1994, Article 104 – 109. The migrant workers were treated equally as the local and provided with free housing and medical assistance.</p>	Complied
<p>Criterion 6.13</p> <p>Growers and millers respect human rights.</p>			
6.13.1	<p>A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations (see Criteria 1.2 and 2.1).</p> <p>-Major compliance-</p>	<p>Human Rights Policy is developed on 1/8/2015 and implemented accordingly at whole Olam International Ltd. The policy has been briefed to the workers during muster.</p>	Complied
<p>Principle 7: Responsible development of new plantings</p>			
<p>Criterion 7.1</p> <p>A comprehensive and participatory independent social and environmental impact assessment is undertaken prior to establishing new plantings or operations, or expanding existing ones, and the results incorporated into planning, management and operations</p>			
7.1.1	<p>An independent social and environmental impact assessment (SEIA), undertaken through a participatory methodology including the relevant affected stakeholders, shall be documented.</p> <p>-Major compliance-</p>	<p>An independent social impact assessment was carried out by the TERA on December 2010 before new planting was carried out. The SIA assessment was based on government regulations and by the government approved assessors through a series of stakeholder consultations.</p>	Complied
7.1.2	<p>Appropriate management planning and operational procedures shall be developed and implemented to avoid or mitigate identified potential</p>	<p>Latest Social Management Plan (by TERA dated May 2016) included in the SEIA management plan. The person responsible for implementation is the Social Manager. Social Action plan dated Jan</p>	Complied

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	negative impacts. -Minor compliance-	2016 described the development plan of “social contracts” and additional program such as providing technical assistance, tools and seeds for villagers in farming. Management plan which include the action to be taken for all the 7 villages was review every month as it is ongoing process. The management plan includes responsibility of each management team members and time frame to address the issues	
7.1.3	Where the development includes an outgrower scheme, the impacts of the scheme and the implications of the way it is managed shall be given particular attention. -Minor compliance-	Not applicable. No scheme smallholder within Awala’s certification scope	Not applicable
Criterion 7.2			
Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.2.1	Soil suitability maps or soil surveys adequate to establish the long-term suitability of land for oil palm cultivation shall be available and taken into account in plans and operations. -Major compliance-	The long term suitability study was carried out by well-known soil specialist from Malaysia, Dr. Paramanathan (Param Agricultural Soil Surveys (M) Sdn Bhd) which conducted on May 2014. A grid soil sampling techniques was used. Besides soil analysis, comparison of climate suitability, rainfall and sunshine was carried out prior to making the decision to plant oil palm in Awala Plantation to ensure suitability of the land for oil palm cultivation.	Complied
7.2.2	Topographic information adequate to guide the planning of drainage and irrigation systems, roads and other infrastructure shall be available and taken into account in plans and operations. -Minor compliance-	The topographic information was developed prior to the land development and used during the initial decision making process. This information is also used as a guide to plan drainage systems, roads and other infrastructure development. LIDAR (Light Detection and Ranging) technology was used to determine the elevation vegetation map, slope map, ground elevation map, hill shading map and contour map. Besides this, profiling analysis, flooding analysis and carbon stock analysis was carried out as part of best operational practice.	Complied
Criterion 7.3			
New plantings since November 2005 have not replaced primary forest or any area required to maintain or enhance one or more High Conservation Values.			

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7.3.1	<p>There shall be evidence that no new plantings have replaced primary forest, or any area required to maintain or enhance one or more High Conservation Values (HCVs), since November 2005. New plantings shall be planned and managed to best ensure the HCVs identified are maintained and/or enhanced (see Criterion 5.2).</p> <p>-Major compliance-</p>	<p>HCV assessment has been conducted by Proforest prior to Awala development and according to the NPP 2010. The assessment reveal that there were no primary forest or any area required to maintain or enhanced was converted to oil palm plantation since November 2005. HCV and other conservation areas identified were mapped and excluded from any development.</p> <p>The Global HCV toolkit and the draft HCV National Interpretation Document for Gabon were used. It was identified HCV 1.1, 1.2, 1.4, 2, 4.1, 5 and 6 within the concession area.</p> <p>Management and monitoring plans were developed based on the HCV consultants' recommendations and these were inspected during the field visit and document review.</p>	Complied
7.3.2	<p>A comprehensive HCV assessment, including stakeholder consultation, shall be conducted prior to any conversion or new planting. This shall include a land use change analysis to determine changes to the vegetation since November 2005. This analysis shall be used, with proxies, to indicate changes to HCV status.</p> <p>-Major compliance-</p>	<p>A joint HCV assessment was conducted by Proforest and TEREA with an initial scoping assessment beginning February 2011. The assessment was conducted by HCV assessment team consisted of 21 persons comprising 5 sociologists, 2 ichthyologists, an ornithologist, and 3 ecologists and 9 botanical and mammalian experts as well as a GIS expert. The assessment reveal that there were no primary forest or any area required to maintain or enhanced was converted to oil palm plantation since November 2005. HCV and other conservation areas identified were mapped and excluded from any development.</p> <p>The Global HCV toolkit and the draft HCV National Interpretation Document for Gabon were used. It was identified HCV 1.1, 1.2, 1.4, 2, 4.1, 5 and 6 within the concession area.</p> <p>Management and monitoring plans were developed based on the HCV consultants' recommendations and these were inspected during the field visit and document review.</p>	Complied
7.3.3	<p>Dates of land preparation and commencement shall be recorded.</p> <p>-Minor compliance-</p>	<p>Dates of land preparation and commencement of planting was recorded and progress of planting is reported on a weekly basis. First land clearing was on May 2011 after the completion of 30days of NPP Notification ended on 18 March 2011.</p> <p>The first planting was in February 2012. Replanting will take place after 25 years from the planting date.</p>	Complied

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7.3.4	<p>An action plan shall be developed that describes operational actions consequent to the findings of the HCV assessment, and that references the grower’s relevant operational procedures (see Criterion 5.2).</p> <p>-Major compliance-</p>	<p>HCV Management Action plan which updated in April 2017 described the management objectives, type of HCV, threats, mitigation measures and monitoring indicator. The action plan has been develop according to the HCV Assessment conducted in Feb 2011.</p> <p>Various management program has been established for the identified HCV area. For example, in total 5 patrol will be organised in the month of April, June, August, October and December to all the HCV area. Report generate for each patrolling recording observation onsite, such as animal trap or fauna observed. The latest report patrol report (224/ANPN/SE/DR/PNP) conducted from 11 April 2017 to 21 April 2017 sighted during onsite.</p> <p>Signage’s are erected and placed at the field to create awareness and individuals/employees are notified of the HCV area to ensure that no illegal hunting is carried out within the Awala Concession.</p>	Complied
7.3.5	<p>Areas required by affected communities to meet their basic needs, taking into account potential positive and negative changes in livelihood resulting from proposed operations, shall be identified in consultation with the communities and incorporated into HCV assessments and management plans (see Criterion 5.2).</p> <p>-Major compliance-</p>	<p>Total 11,045 ha which identified as the HCV 5 under HCV North area of Komo estate for the local communities for their activities such as hunting, fruit harvesting and fishing.</p> <p>Interviewed the villagers and they were authorized with the badges for hunting activities in the HCV areas. The permit stated the rules & regulation, signature of the chief and Olam stamp. The villager also satisfied with the control as it will restrict the stranger from other places access to their area.</p>	Complied
<p>Criterion 7.4 Extensive planting on steep terrain, and/or marginal and fragile soils, including peat, is avoided.</p>			
7.4.1	<p>Maps identifying marginal and fragile soils, including excessive gradients and peat soils, shall be available and used to identify areas to be avoided</p> <p>-Major compliance-</p>	<p>A soil map is available in the SEIA report. No peat soil or fragile soil. Slope area more than 20° was not planted to avoid erosion following the recommendation from HCV assessment.</p>	Complied
7.4.2	<p>Where limited planting on fragile and marginal soils, including peat, is proposed, plans shall be developed and implemented to protect them without incurring adverse impacts.</p>	<p>No fragile or peat soil at Awala Plantation</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	-Major compliance-		
Criterion 7.5 No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their free, prior and informed consent. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
7.5.1	Evidence shall be available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the grower/miller is signed and ratified by these local peoples. -Major compliance-	No customary right or land owned by local communities within the Awala Plantation.	Complied
Criterion 7.6 Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their free, prior and informed consent and negotiated agreements.			
7.6.1	Documented identification and assessment of demonstrable legal, customary and user rights shall be available. -Major compliance-	No customary right or land owned by local communities within the Awala Plantation was noted during audit. Fruit trees which existed within the development areas were compensated by the company as per Decree n° 1016-PR dated 24/8/2011.	Complied
7.6.2	A system for identifying people entitled to compensation shall be in place -Major compliance-	There were no issues related to lost access rights. The identification of compensation for the fruit trees which existed in the development areas were compensated by the company as per Decree n° 1016-PR dated 24/8/2011.	Complied
7.6.3	A system for calculating and distributing fair compensation (monetary or otherwise) shall be in place. -Major compliance-	The compensation refers to the Decree n° 1016-PR dated 24/8/2011 as well as the consensus from the villager.	Complied
7.6.4	Communities that have lost access and rights to land for plantation expansion shall be given opportunities to benefit from plantation development.	There were no issues related to lose of access rights.	Complied

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	-Minor compliance-		
7.6.5	The process and outcome of any compensation claims shall be documented and made publicly available. -Minor compliance-	The identification of compensation for the fruit trees which existed in the development areas was compensated by the company as per Decree n° 1016-PR dated 24/8/2011.	Complied
7.6.6	Evidence shall be available that the affected communities and rights holders have access to information and advices that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. -Minor compliance-	The local communities has been briefed on the procedure of the information request by the Assistant of FPIC. Seen the records of their acknowledgement once they have attended the briefing	Complied
Criterion 7.7 No use of fire in the preparation of new plantings other than in specific situations, as identified in the ASEAN guidelines or other regional best practice.			
7.7.1	There shall be no land preparation by burning, other than in specific situations, as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. -Major compliance-	Olam Sustainable Palm Policy which approved on February 2017 described no use of fire in land preparation, including planting and replanting. It also in-lined with the "Land Clearing and Preparation" section 2.5 of Olam Agricultural Manual and it was implemented throughout the land clearing and planting operation. All the new planting in Awala completed in December 2016.	Complied
7.7.2	In exceptional cases where fire has to be used for preparing land for planting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. -Minor compliance-	No fired used for preparing of land for new planting. All the new planting in Awala completed in December 2016. This could be observed at Bokoue and Komo estate during field assessments.	Complied
Criterion 7.8 New plantation developments are designed to minimize net greenhouse gas emissions.			
7.8.1	The carbon stock of the proposed development area and major	For the estate, GHG emissions identified including COx, SOx and NOx from various sources including	

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	<p>potential sources of emissions that may result directly from the development shall be identified and estimated.</p> <p>-Major compliance-</p>	<p>fossil fuel, chemical, peat oxidation, sinks, crop sequestration, fertilizer consumptions and sequestration in conservation area.</p> <p>For mill, GHG emission identified from POME, fuel consumption and grid electricity utilization.</p> <p>Emission recorded based on RSPO GHG calculator, OPG achieved net sequestration through conservation set asides.</p>	Complied
7.8.2	<p>There shall be a plan to minimize net GHG emissions which takes into account avoidance of land areas with high carbon stocks and/or sequestration options.</p> <p>-Minor compliance-</p>	<p>All estates are carbon neutral, sequestration mainly from crop planting on low carbon stock area (degraded area/ savannah) and sequestration from conservation set asides.</p> <p>Other plan in minimizing GHG emissions such as prioritize expansion in savannah landscape and install methane capture facility in all palm oil mills in next two years.</p>	Complied
Principle 8: Commitment to continuous improvement in key areas of activity			
Criterion 8.1			
Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in their key operations.			
8.1.1	<p>The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</p> <p>-Major compliance-</p>	<p>The company has a plan to construct workers' quarters in all the estate. Seen the contract agreement with the contractor confirmed that the management has allocated and started to construct new quarters for workers.</p> <p>Currently, there are total 22 blocks in planning to construct since Y2016. In Y2017, total 6 blocks were completed and remaining blocks under construction in Komo Estate and Bokoue Estate.</p> <p>The blueprint for the mechanization was sighted.</p> <ol style="list-style-type: none"> 1. Mechanised in-field collection. 2. Mechanised fertilizer application 3. Semi-mechanised path & circle spraying <p>Chemical container shredding machine after tripled rinse and wash. The machine able to reduce contamination risk especially there is no schedule waste collector at this moment in Gabon.</p> <p>Plan of methane capture facility installation in all palm oil mills in minimizing GHG emissions.</p>	Complied

Appendix B: Approved Time Bound Plan

Unit	Remarks	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021
OLAM	Olam joined RSPO as Processor and Trader	Feb 11										
	Olam Sustainable Palm Policy v1	June 11										
	Olam renewed membership as Grower		Feb 12									
	Olam Sustainable Palm Policy v2					June 15						
AWALA	NPP notification	Feb 11										
	RSPO independent gap assessment			Apr 13								
	Mill commissioned					Sept 15						
	RSPO initial certification						June 16					
	RSPO surveillance audit							May 17	Apr 18	Mac 19	Feb 20	
Mouila	NPP notification		June 12									

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LOT 1	RSPO independent gap assessment						June 16					
	Mill commissioned							Jan 17				
	RSPO initial certification							Dec 17				
	RSPO surveillance audit											
Mouila LOT 3	NPP notification						May 15					
	RSPO independent gap assessment							May 17				
	Mill commissioned									Jan 19		
	RSPO initial certification									Dec 19		
	RSPO surveillance audit											
OPG Makouke	Inclusion under Olam RSPO membership						Aug 16					
	RSPO independent gap assessment								Jan 18			
	Mill activation								Dec 18			
	RSPO initial certification									July 19		

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	RSPO surveillance audit											
Mouila LOT 2	NPP notification			Dec 13								
	RSPO independent gap assessment								Dec 19			
	Mill commissioned											Jan 21
	RSPO initial certification											Dec 21
	RSPO surveillance audit											
GRAINE ¹	SOTRADER joined RSPO					July 15						
	NPP notification						June 16					
	RSPO initial certification								April 18			
	100% certification of GRAINE Palm SH											

¹Refer to SOTRADER’s certification time bound plan for schemed smallholders

*Actual date to be verified

Appendix C: Certification Unit RSPO Certificate Details

Olam International Limited
 Olam Palm Gabon – Awala Palm Oil Mill
 Galerie Tsika, En face de city Sport, Mbolo
 BP: 1024, Libreville
 Gabon, Africa
 RSPO membership number: 1-0114-12-000-00

BSI RSPO Certificate No. : RSPO 651890
 Date of Initial Certificate Issued: 25/08/2016
 Date of Expiry: 24/08/2021
 Applicable Standards: RSPO P&C Gabon-NI-2016; RSPO Supply Chain Certification Standard November 2014
 Module E – CPO Mills: Mass Balance)

Awala Palm Oil Mill and Supply Base					
Location Address		Awala Palm Oil Mill, Awala Plantation, Kango, Gabon, West Africa			
GPS Location		10° 11' 51.8172" E ; 0° 01' 19.1549" S			
CPO Tonnage Total		19,017.34 mt			
PK Tonnage Total		3,492.98 mt			
CPO Claimed for Certification*		19,017.34 mt			
PK Claimed for Certification *		3,492.98 mt			
Own estates FFB Tonnage		77,621.00 mt			
Scheme Smallholder FFB Tonnage		-			
Estates	Production Area		Other use (ha)	Certified Area / Total land lease (ha)	Annual FFB Production (mt)
	Mature (ha)	Immature (ha)			
Bokoue Estate	2,170	143	990	3,303	28,057.00
Lobe Estate	2,160	79	848	3,087	29,672.00
Komo Estate	2,172	98	11,370	13,640	19,892.00
Total	6,502	320	13,208	20,030	77,621.00

Appendix D: Assessment Plan

Date	Time	Subjects	HBH	HFZ	HNS	IK	JJ
Friday 16/06/2017	2145 - 2240	Kuala Lumpur – Singapore Flight (MI 341- Singapore Airline)	√	√	√		
Saturday 17/06/2017	0125 - 0610	Singapore – Johannesburg Flight (SW 478-South African Airline)	√	√	√		
	1500 - 1855	Johannesburg – Libreville Flight (SA 86- South African Airline)	√	√	√		
Sunday 18/06/2017	1300 - 1700	Meet up translator & local expert Travel to Awala estate’s guest house	√	√	√	√	√
Monday 19/06/2017	AM - PM	OLAM Gabon (Kango, Libreville) <ul style="list-style-type: none"> Meeting & interviews with stakeholders including government agencies, local council, NGOs, contractors, vendors, suppliers, local communities & etc 		√	√		
Tuesday 20/06/2017 Awala Palm Oil Mill	0830 - 0930	Opening Meeting <ul style="list-style-type: none"> Presentation by OLAM – Awala Palm Oil Mill Presentation by BSI Lead Auditor – introduction of team members and assessment agenda 	√	√	√	√	√
	0930 - 1230	Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc.	√	√	√	√	√
	1100 - 1230	Supply chain for CPO mill, weighbridge officer, production record and etc	√				
	1230 - 1330	Lunch	√	√	√	√	√
	1330 - 1700	Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, TBP, CIP and implementation etc).	√	√	√	√	√
	1700 - 1730	Interim Closing briefing	√	√	√	√	√
Wednesday 21/06/2017 Bokoue Estate	0830 - 1230	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, schedule waste management, worker housing, clinic, landfill, etc.	√	√	√	√	√
	1100 -1230	Meeting with stakeholders (Government, village rep, smallholders, workers leader, contractor etc.)	√	√	√	√	√
	1230 - 1330	Lunch	√	√	√	√	√

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Date	Time	Subjects	HBH	HFZ	HNS	IK	JJ
	1330 - 1700	Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√	√	√
	1700 - 1730	Interim closing briefing	√	√	√	√	√
Thursday 22/06/2017	0830 - 1230	Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, schedule waste management, worker housing, clinic, landfill, etc.	√	√	√	√	√
Komo estate	1100 - 1230	Meeting with stakeholders (Government, village rep, smallholders, workers leader, contractor etc.)		√	√	√	√
	1230 - 1330	Lunch					
	1330 - 1600	Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√	√	√
	1600 - 1630	Verify any outstanding issues & preparation for closing meeting	√	√	√	√	√
	1630 – 1730	Closing meeting	√	√	√	√	√
	1730 – 1900	Travel to Libreville	√	√	√	√	√
	Thursday – Friday 22 – 23/06/2017	2320 – 0455	Libreville – Johannesburg Flight (SA 87- South Africa Airline)	√	√	√	
Friday – Saturday 23 – 24 /06/2017	1345 – 0610	Johannesburg – Singapore Flight (SQ 479 – South African Airline)	√	√	√		
	0710 - 0805	Singapore – Kuala Lumpur Flight (MI 324-Singapore Airline)	√	√	√		

Appendix E: Stakeholders Contacted

Internal Stakeholders

Managers and assistants Male mill staff/workers Female mill staff/workers Foreign workers Male and female estate worker Hospital assistant Female assistant at clinic Union representatives Gender committee secretary	Contractors Village representative
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External Stakeholders

Chief of Villagers (Ayeme Bokoue 2, Agricole and etc)	Department of Forestry Department of Agriculture Department of Education
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Appendix F: CPO Mill Supply Chain Assessment Report (Module E : Mas Balance)

Requirements	Compliance
E.1 Definition	
<p>E.1.1 Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and volume sales of RSPO certified producers. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>Awala Palm Oil Mill receives and process both certified and non-certified FFB. Therefore, it uses the Mass Balance supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified and non-certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified Products.</p>
E.2 Explanation	
<p>E.2.1 The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the CB in the public summary of the P&C certification report. This figure represents the total volume of certified palm oil product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced should then be recorded in each subsequent annual surveillance report.</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.</p>
<p>E.2.2 The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).</p>	<p>The mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim). Their registered member ID is Member ID: RSPO_PO1000002779</p>
E.3 Documented procedures	
<p>E.3.1 The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:</p> <p>a) Complete and up to date procedures covering the implementation of all the elements in these requirements;</p> <p>b) The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site procedures for the implementation of this standard.</p>	<p>Awala Palm Oil Mill has procedures- RSPO Supply Chain and Traceability (Mass Balance model); doc no: APOM-SC/MB/001; issue date: 1 June 2017) for the incoming FFB, processing and outgoing Crude Palm Oil and Palm Kernel for the traceability with Mass Balance model covering certified and non-certified FFB received.</p> <p>The mill manager and assistant manager have awareness of the supply chain system. The manager has overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements.</p>
<p>E.3.2 The site shall have documented procedures for receiving and processing</p>	<p>Awala Palm Oil Mill has documented procedures- clause 1.6 for the incoming FFB, processing and outgoing palm products (CPO and PK). System available to</p>

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certified and non-certified FFBs.	make marking on the receiving documents to differentiate the certified and noncertified FFB received.
E.4 Purchasing and goods in	
E.4.1 The site shall verify and document the volumes of certified and non-certified FFBs received.	Similar to last assessment daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified FFB. Records verified by internal and external audit. Awala mill have system to verify at the weighbridge. Sample of weighbridge ticket : <ul style="list-style-type: none"> a. Weighbridge ticket: 2017006672; Date: 26 March 2017; Own Supply base: Komo Estate; FFB Volume: 2,540 kg b. Weighbridge ticket: 2017006677; Date: 18 June 2017; Own Supply base: Lobe Estate; FFB Volume: 5,640 kg c. Weighbridge ticket: 5005444680; Date: 24 May 2017; Outside Crop Producer: Agro Fort; FFB Volume: 2,040 kg d. Weighbridge ticket: 5002476534; Date: 09 June 2017; Outside Crop Producer: Agro Fort; FFB Volume: 1,460 kg
E.4.2 The site shall inform the CB immediately if there is a projected overproduction.	The facilities aware of this procedure and it written in the procedures.
E.5 Record keeping	
E.5.1 a) The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis. (b) All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c) The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three months. However, a site is allowed to sell short.(ie product can be sold before it is in stock.)	All the inventory records are maintained and updated on daily basis and monthly and reported on monthly and 3 monthly inventory. Computerized system in place. Daily records are prepared at the entry point at the weighbridge. Up to date, the mill only has sales on RSPO Certified PKO and CPO through Book & Claim. Daily summary and monthly summary documented for all the FFB received (certified and non-certified) and total CSPO Produced. Records of certified FFB received verified during annual surveillance. Records verified by internal and external audit. Mass Balancing Records for POM year 2016 and 2017 were verified.
E.5.2 In cases where a mill outsources activities to an independent palm kernel crush, the crush still falls under the responsibility of the mill and does not need to be separately certified. The mill has to ensure that the crush is covered through a signed and enforceable agreement	No outsourcing activities.

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Actual Certified Palm Production 01 July 2016 – 1 June 2017 (ASA 1)

Mill	Processing Capacity	CPO	PK
Awala Palm Oil Mill	45 mt/hr	6,424	1,119

Actual Tonnage Sales of Certified Palm Products -01 July 2016 – 31 June 2017 (ASA 1)

Mill	Certified CPO Sales	Certified PK Sales	Remarks
Awala Palm Oil Mill	1000 MT*	786.20**	*credit sold via palmtrace book and claim **Internally sold to Awala KCP

Month	Certified Supply Base (from own certificate scope) (mt)			Total FFB/Month (mt)
	Bokoue Estate	Lobe Estate	Komo Estate	
July 2016	n/a	n/a	n/a	n/a
Aug 2016	n/a	n/a	n/a	n/a
Sep 2016	812	835	333	1,980
Oct 2016	645	567	213	1,425
Nov 2016	1,121	1,070	433	2,624
Dec 2016	1,181	1,213	552	2,947
Jan 2017	1,053	1,084	582	2,720
Feb 2017	991	1,104	540	2,635
Mar 2017	1,342	1,660	739	3,741
April 2017	1,264	1,706	779	3,749
May 2017	1,097	1,602	764	3,464
June 2017	972	1,177	672	2,820
Total	10478	12,018	5,607	28,105

Appendix G: GHG Reporting Executive Summary

The GHG emissions that were produced in 2016 for Awala Palm Oil Mill and supply base was calculated using the GHGpalm Calculator version 3.0. The assessment team had verified the data input in the GHGpalm Calculator against operations records. Palm GHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

- i. Estates area planted data
- ii. Fuel consumed
- iii. Mill datas include CPO produced, PKO Produced and FFB Processed
- iv. Fertilizer consumed data for both estates and smallholders.

The summary of the Net GHG emitted in 2016 for Awala Palm Oil Mill mill and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	-35.97
PKO	-46.84

Extraction	%
OER	21.57
KER	4.14

Production	t/yr
FFB Process	28,105
CPO Produced	6,424
PKO Produced	361

Land Use	Ha
OP Planted Area	40,336.95
OP Planted on peat	0
Conservation (forested)	31,176.00
Conservation (non-forested)	0
Total	71,512.95

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	122062.9	7.53	198390.95	29.34	0	0	320,453.85	11.40
CO ₂ Emission from fertilizer	2527.58	0.16	671	0.1	0	0	3,198.58	0.11
NO ₂ Emmision	2045.19	0.13	1101.93	0.16	0	0	3,147.12	0.11
Fuel Consumption	4842.81	0.3	7200.76	1.06	0	0	1,2043.57	0.43
Peat Oxidation	0	0	0	0	0	0	0	0
Sink								
Crop Sequestration	-60869.33	-3.76	-274744.22	-40.63	0	0	-335,613.55	-11.94
Conservation Sequestration	-113611.68	-7.01	-161984.16	-23.96	0	0	-275,595.84	-9.69
Total	-42954.53	-2.65	-229396.74	-33.92	0	0	-272,66.27	-9.69

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	5,648.11	0.2
Fuel Consumption	164.31	0.01
Grid Electricity Utilisation	0	0
Credit		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	5,812.42	0.21

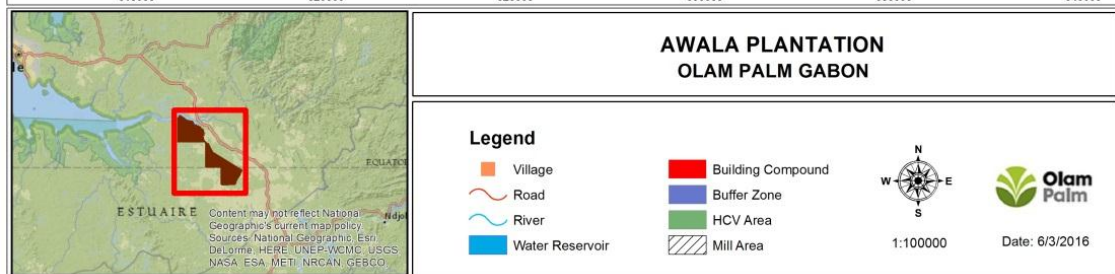
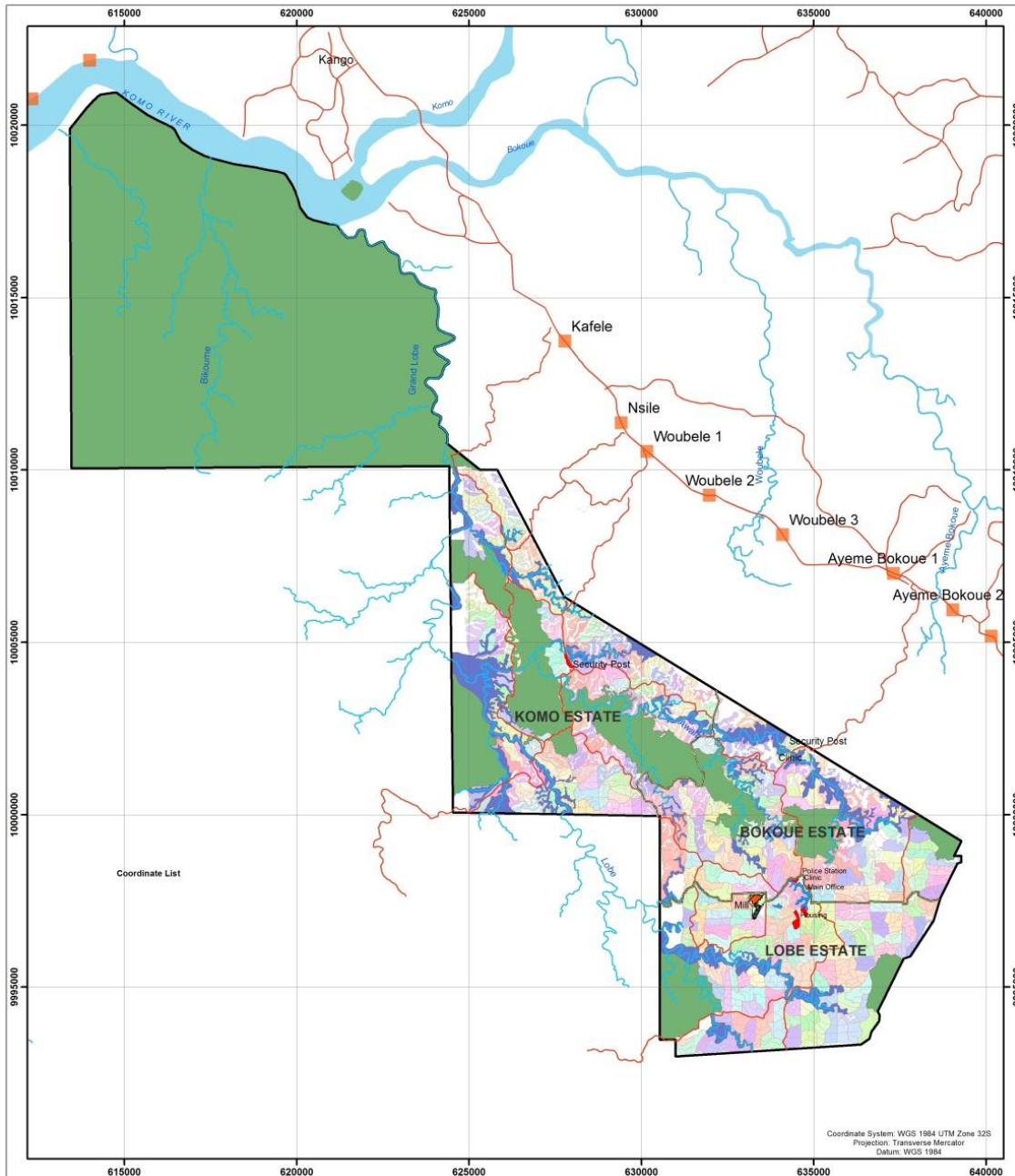
Summary of Kernel Crusher Emission and Credit (applicable)

Emissions	tCO ₂ e
PK from own mill	-42,926.66
PK from other source	0
Fuel Consumptions	117.92
Total Crusher emissions	-42,808.74

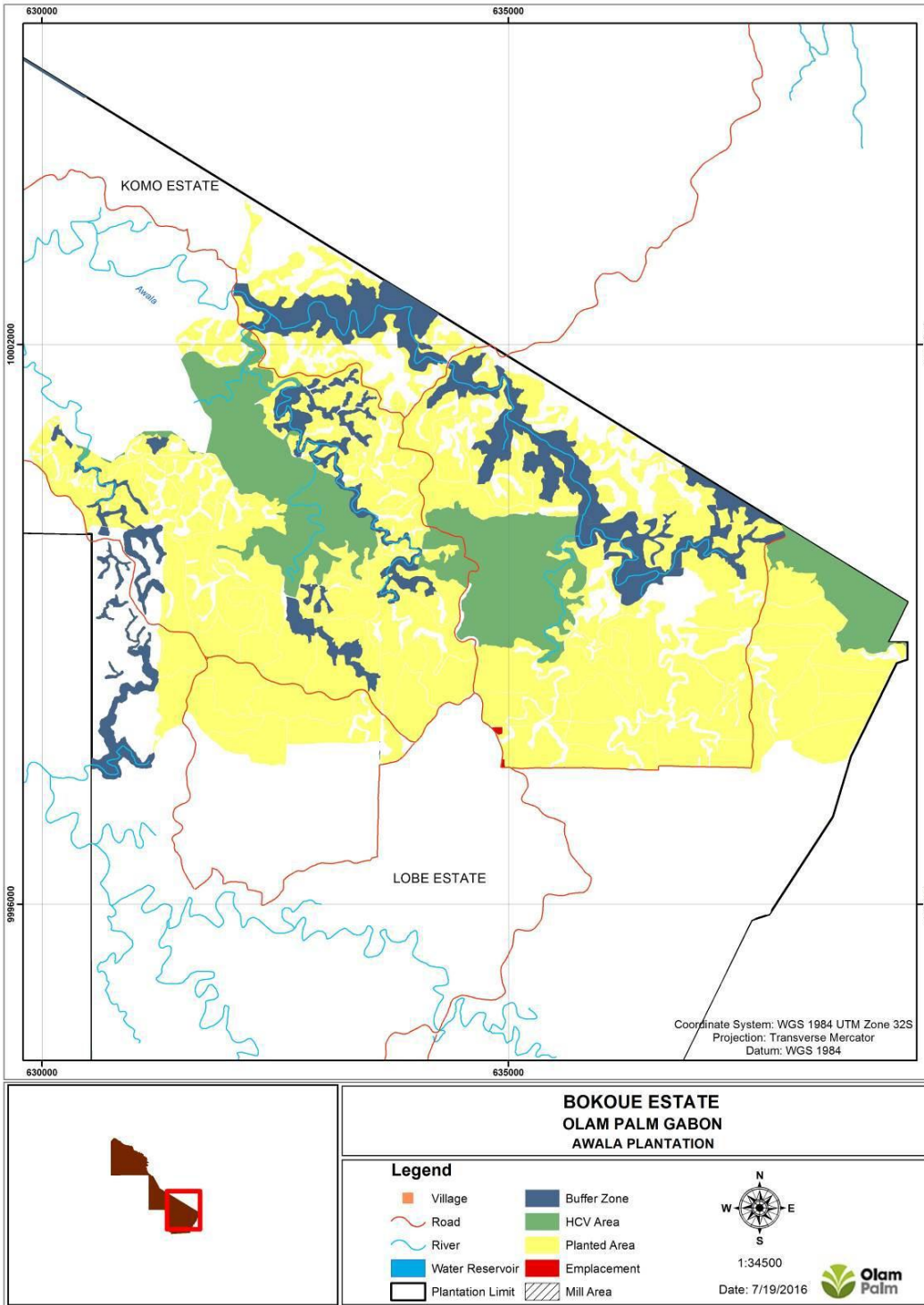
Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0

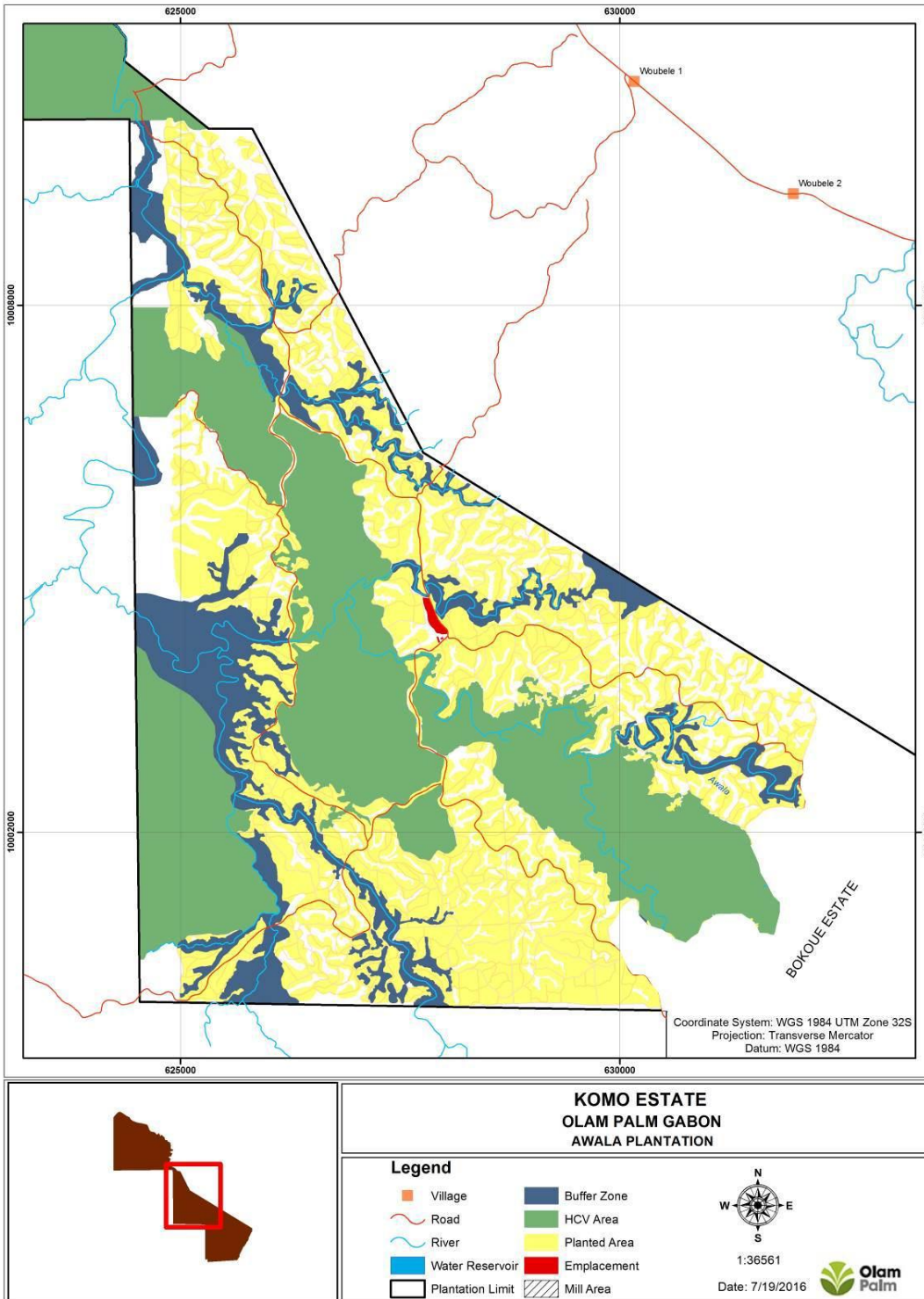
Appendix H: Location Map of Awala Certification Unit and Supply bases



Appendix I: Bokoue Estate Field Map



Appendix J: Komo Estate Field Map



Appendix K: List of Smallholder Sampled

- Not applicable -

Appendix L: List of Abbreviations Used

AN	Ammoniacal Nitrogen
ANPN	National Park Agency Gabon
ASA	Annual Surveillance Assessment
BOD	Biological Oxygen Demand
CHRA	Chemical Health Risk Assessment
CDQ	Chef D'Equipes/supervisor
CIP	Continual Improvement Plan
CPO	Crude Palm Oil
CRS	Corporate Responsibility and Sustainability
DGEPN	Environmental Protection Agency Gabon
DOE	Department of Environment
DOSH	Department of Occupational Safety & Health
EFB	Empty Fruit Bunch
EIA	Environmental Impact Assessment
EMS	Environmental Management System
ERP	Emergency Response Plan
FFB	Fresh Fruit Bunch
GRAINE	Gabon des Realisations Agricoles et des Initiatives de Nationaux Engages
HCV	High Conservation Value
HIRARC	Hazard Identification, Risk Assessment and Risk Control
IPM	Integrated Pest Management
ISCC	International Sustainable Carbon Certification
KER	Kernel Extraction Rate
MSDS	Material Safety Data Sheet
NGO	Non Governmental Organisation
OER	Oil Extraction Rate
OSH	Occupational Safety & Health
PK	Palm Kernel
PKO	Palm Kernel Oil
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RED	Renewable Energy Directive
RSPO	P&C Roundtable on Sustainable Palm Oil Principle & Criteria
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SHO	Safety and Health Officer
SIA	Social Impact Assessment
SOP	Standard Operating Procedure
SS	Suspended solids
TN	Total Nitrogen
TS	Total Solids
TBP	Time Bound Plan
WTP	Water Treatment Plant