

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment**
- Annual Surveillance Assessment** (Choose an item.)
- Recertification Assessment** (Choose an item.)
- Extension of Scope**

Client Company Name / Parent Company: Olam Group Limited
Client Company / Parent Company Address: 9 Temasek Boulevard #11-02 Suntec Tower Two, Singapore
Certification Unit: Olam Palm Gabon SA - Bilala Palm Oil Mill
Location of Certification Unit: PK 19 National Road N1, Mouila, Gabon
Date of Final Report: 13/5/2023

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	Olam Group Limited		
RSPO Membership Number	1-0379-22-000-00	Membership Approval Date	09/10/2006
Address	9 Temasek Boulevard #11-02 Suntec Tower Two, Singapore		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Olam Palm Gabon SA - Bilala Palm Oil Mill		
Location / Address	PK 19 National Road N1, Mouila, Gabon		
Website	www.olanngroup.com		
Management Representative	Mahamadou DAO	E-mail	mohamed.dao@olamnet.com
Telephone	+24166006178	Facsimile	-

2. Certification Information			
Certificate Number	RSPO 671034	Certificate Start Date	28/12/2022
Date of First Certification	28/12/2017	Certificate Expiry Date	27/12/2027
Scope of Certification	Production of Palm Oil and Palm Kernel Extended scope: upgrade from Mass Balance to Identity Preserved module and inclusion of outsourced bulking installation storage facility at Owendo Port, Libreville		
Visit Objectives	<ul style="list-style-type: none"> Determination of the conformity of the client's management system, or parts of it, with audit criteria. Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements. 		
Assessment Cycle	<input type="checkbox"/> Pre-Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input type="checkbox"/> Annual Surveillance Assessment (ASA Choose an item.) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input checked="" type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> Choose an item. <input checked="" type="checkbox"/> Gabon National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input checked="" type="checkbox"/> Identity Preserved; <input type="checkbox"/> Mass Balance	Mill Capacity	90 mt/hr
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		
Is this a remote audit or on-site audit	<input checked="" type="checkbox"/> On-site audit (Option AI)	<input type="checkbox"/> On-site audit (Option AII)	<input type="checkbox"/> Remote audit (Option B)

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
Nil			

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Olam Palm Gabon SA-Bilala POM	Lot 1 Mboukou Bilala, National Road N1, Mouila, Gabon	1° 39' 07.76" S	10° 51' 16.30" E
Estate 1 (Lot 1 Plantation)	Mouila Lot 1 Estate, National Road N1, Mouila, Gabon	1° 46' 37.30" S	10° 57' 43.80" E
Estate 2 (Lot 1 Plantation)	Mouila Lot 1 Estate, National Road N1, Mouila, Gabon	1° 41' 25.70" S	10° 51' 20.20" E
Estate 3 (Lot 1 Plantation)	Mouila Lot 1 Estate, National Road N1, Mouila, Gabon	1° 39' 07.75" S	10° 51' 16.30" E
Estate 4 (Lot 1 Plantation)	Mouila Lot 1 Estate, National Road N1, Mouila, Gabon	1° 39' 29.80" S	10° 49' 53.50" E
Estate 5 (Lot 1 Plantation)	Mouila Lot 1 Estate, National Road N1, Mouila, Gabon	1° 38' 13.20" S	10° 47' 24.10" E
Estate 6 (Lot 1 Plantation)	Mouila Lot 1 Estate, National Road N1, Mouila, Gabon	1° 37' 55.30" S	10° 51' 29.00" E
Estate 7 (Lot 2 Plantation)	Mouila Lot 2 Estate, National Road N1, Mouila, Gabon	1° 39' 00.94" S	10° 26' 26.24" E
Estate 8 (Lot 2 Plantation)	Mouila Lot 2 Estate, National Road N1, Mouila, Gabon	1° 34' 21.69" S	10° 27' 48.48" E
Estate 9 (Lot 2 Plantation)	Mouila Lot 2 Estate, National Road N1, Mouila, Gabon	1° 33' 04.60" S	10° 31' 22.63" E

Note: The Plantations (Lots) has been broken down into estates for ease of managements but are managed as a whole.

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5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No (no change in total planted area)			<input type="checkbox"/> Yes (please refer to Principle 7 for details)	
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Mouila Lot 1 Plantation (Estate 1-6)	15,885	18,323	1,147	35,355	44.93
Mouila Lot 2 Plantation (Estate 7-9)	9,060	21,543	1,197	31,800	28.49
Total	24,945	39,866	2,344	67,155	37.15

Note: Since the estate 1-6 and estate 7-9 are managed by the same management team and each estate are closed each other, the reporting on the areas have been merged according to the nature of the estate management.

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Mouila Lot 1 Plantation	-	15,885	-	-	15,885	-
Mouila Lot 2 Plantation	-	9,060	-	-	9,060	-
Total (ha)	-	24,945	-	-	24,945	-

Note: Only Mature area is considered as production area

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Dec 2021 – Nov 2022)	Actual (Nov 2021 – Oct 2022)		Forecast (Dec 2022 - Nov 2023)
		Previous license period (Nov 2021)	Current license period (Dec 2021 - Oct 2022)	
Lot 1 Plantation	189,029.06	5,975.34	161,242.91	207,653
Lot 2 Plantation	66,741.2	2,746.74	59,033.92	87,883
Total	255,770.26	228,998.91		*295,536

Note: Forecasted yield is low since majority of the palms are still at the young matured stage.

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8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Dec 2021 – Nov 2022)	Actual (Nov 2021 – Oct 2022)		Forecast (Dec 2022 - Nov 2023)
		Previous license period (Nov 2021)	Current license period (Dec 2021 - Oct 2022)	
Lot 3 Plantation			56.10	
Total			56.10	

Note: 1. The period of tonnage FFB verification is based on the latest assessment report (recertification assessment) because the scope of this audit is to scope extension
2. Lot 3 Plantation is certified under Dola POM certification unit.

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Dec 2021 – Nov 2022)	Actual (Nov 2021 – Oct 2022)		Forecast (Dec 2022 - Nov 2023)
		Previous license period (Nov 2021)	Current license period (Dec 2021 - Oct 2022)	
Nil				
Total			-	

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	Nov-21	8,722.08	-	8,722.08
2	Dec-21	11,760.19	-	11,760.19
3	Jan-22	14,779.98	-	14,779.98
4	Feb-22	17,661.51	-	17,661.51
5	Mar-22	23,649.30	-	23,649.30
6	Apr-22	30,004.60	-	30,004.60
7	May-22	31,529.10	-	31,529.10
8	Jun-22	28,770.09	-	28,770.09
9	Jul-22	20,667.83	-	20,667.83
10	Aug-22	17,598.66	-	17,598.66
11	Sep-22	12,489.35	-	12,489.35

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12	Oct-22	11,422.32	-	11,422.32
TOTAL		229,055.01		229,055.01

Note: The period of tonnage FFB verification is based on the latest assessment report (recertification assessment) because the scope of this audit is to scope extension

10. Summary of Certified Tonnage (MT) (not applicable for ISS)			
Estimated last year (Dec 2021 – Nov 2022)	Actual (Nov 2021 – Oct 2022)		Forecast (Dec 2022 - Nov 2023)
	Previous license period (Nov 2021)	Current license period (Dec 2021 - Oct 2022)	
FFB	FFB		FFB
255,770.26 mt	8,722.08 mt	220,332.93 mt	295,536 mt
	229,055.01		
CPO (OER: 24.00%)	CPO (OER: 23.87%)		CPO (OER: 23.99%)
61,384.86 mt	2,197.21 mt	52,469.47 mt	70,899.09 mt
	54,666.68 mt		
PK (KER: 4.50%)	PK (KER: 3.62%)		PK (KER: 3.99%)
11,509.66 mt	414.62 mt	7,883.71 mt	11,791.89 mt
	8,298.33 mt		

Note: The period of certified tonnage of products is based on the latest assessment report (recertification assessment) because the scope of this audit is to scope extension

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	Nov-21	2,197.21	341.56
2	Dec-21	2,902.10	414.62
3	Jan-22	3,381.69	540.75
4	Feb-22	4,623.37	766.62
5	Mar-22	5,751.70	995.91
6	Apr-22	6,629.28	1,050.09
7	May-22	7,498.67	1,110.80
8	Jun-22	6,928.98	966.77
9	Jul-22	5,029.57	651.98
10	Aug-22	4,092.28	592.24
11	Sep-22	2,903.77	451.43
12	Oct-22	2,728.06	415.56

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TOTAL	54,666.68	8,298.33
<p>Note: The period of certified tonnage of products is based on the latest assessment report (recertification assessment) because the scope of this audit is to scope extension</p>		

11. Summary of Actual Volume sold					
Current License period (Dec 2021 - Oct 2022)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	1,918.67	7,027.40		42,468.98	51,415.05
PK (MT)	7,883.71	-	-	-	7,883.71
Credits	-	-	-	-	-
Previous License period (Nov 2021)					
CPO (MT)	-	-	-	2,526.79	2,526.79
PK (MT)	414.62	-	-	-	414.62
Credits	-	-	-	-	-
<p>Note: Conventional is RSPO certified material but sold as non-RSPO. The period of certified tonnage sold is based on the latest assessment report (recertification assessment) because the scope of this audit is to scope extension</p>					

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any) (Nov 2021 - Oct 2022)				
No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	Non-disclosure 1	Non-disclosed	1,918.67	-
2	OPG-Mouila Bilala Kernel Crushing Plant	RSPO_PO1000011348	-	8,298.33
TOTAL			1,918.67	8,298.33
<p>Note: The period of certified tonnage sold is based on the latest assessment report (recertification assessment) because the scope of this audit is to scope extension</p>				

11B. Records of certified CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	Non-disclosure 2	ISCC	2,927.65	-
2	Non-disclosure 3	ISCC	4,099.75	-
TOTAL			7,027.40	-

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11C. Records of CPO & PK Sold as conventional since the last audit (if any) (Nov 2021 - Oct 2022)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
1	Non-disclosure 4	17,761.03	-
2	Non-disclosure 5	27,234.74	-
TOTAL		44,995.77	-

Note: 1. Note: The period of certified tonnage sold is based on the latest assessment report (recertification assessment) because the scope of this audit is to scope extension
2. The volume of 2,526.79 mt sold in the previous license period is included in this figure.

11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold
	Nil		
TOTAL			NA

12. Independent Smallholders Certified Tonnage (MT) / Volume									
Phase	Estimated last year (key in period)			Actual (key in period)			Forecast (key in period)		
	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB									
IS-CSPO									
IS-CSPKO									
IS-CSPKE									
CSPK									

Note: Not applicable

12A. Monthly Records of Certified CPO, PK & PKE (equivalent) produced since the last audit						
No.	Month - Year	FFB (MT)	Certified CPO (MT)	Certified PK (MT)	Certified PKO (MT)	Certified PKE (MT)
	NA	NA	NA	NA	NA	NA
TOTAL		NA	NA	NA	NA	NA

Note: Not applicable

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13. Independent Smallholders Actual Sold Tonnage / Volume							
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
Current License period (key in period)							
Credits				NA	NA	NA	NA
Physical	NA	NA	NA				
Previous License period (key in period)							
Credits				NA	NA	NA	NA
Physical	NA	NA	NA				
Note: Not applicable							

13A. Records of Certified FFB, CPO, PK & PKE (including credits) sold since the last audit							
No.	Buyers Name	PalmTrace Trading License Number	FFB Sold (MT)	Certified CPO Sold (MT/credit)	Certified PK Sold (MT/credit)	Certified PKO Sold (MT/credit)	Certified PKE Sold (MT/credit)
	NA	NA	NA	NA	NA	NA	NA
TOTAL			NA	NA	NA	NA	NA
Note: Not applicable							

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)
Suite 29.01 Level 29, The Gardens North Tower,
Mid Valley City, Lingkaran Syed Putra,
59200 Kuala Lumpur, Malaysia.
Tel +60 (3) 9212 9638 Fax +60 (3) 9212 9639
Representative: Dr. Chaiyaporn Seekao (Chaiyaporn.Seekao@bsigroup.com)
Website: www.bsigroup.com

BSI is a leading global provider of management systems assessment and certification, with more than 92,000 certified locations and clients in over 193 countries. BSI is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia.

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on 28 and 31 March 2023. The audit programme is included as Section 2.3.

The approach to the audit was to treat the mill and supply base as an RSPO Certification Unit. A range of occupational health and safety, environmental, best practice management, and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas, local communities engagement and workers welfare and safety. 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 National Interpretation 2019 of the RSPO P&C 2018 was used as the normative reference to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula $N = (\sqrt{y}) \times (z)$ where y is the number of estates and where z is the multiplier defined by risk assessment. While, the sampling of smallholders were based on the formula $(\sqrt{y}) \times (z)$; where y is total number of group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix E.

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.

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 Section 3.4.

The non-conformities for this audit are detailed in Section 3.3 and unless it is stated in this section, all previous nonconformities including minor nonconformities are remains closed.

This report is structured to provide a summary of assessment finding as provided in Appendix A. The assessment was conducted based on risk based approach sampling and therefore nonconformities may exist.

For Initial, Re-certification and Extension of Scope assessment, the report was externally reviewed by approved external peer reviewer prior to certification decision by BSI.

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For Annual surveillance assessment, the report was internally reviewed and approved by BSI qualified certification reviewer.

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Recertification)	Extension of scope	Year 2 (ASA1_1)	Year 3 (ASA1_2)	Year 4 (ASA1_3)
Bilala POM	✓	✓	✓	✓	✓
Estate 1 (Lot 1 Plantation)					✓
Estate 2 (Lot 1 Plantation)			✓		
Estate 3 (Lot 1 Plantation)	✓				✓
Estate 4 (Lot 1 Plantation)			✓		✓
Estate 5 (Lot 1 Plantation)				✓	
Estate 6 (Lot 1 Plantation)	✓			✓	
Estate 7 (Lot 2 Plantation)			✓		✓
Estate 8 (Lot 2 Plantation)	✓			✓	
Estate 9 (Lot 2 Plantation)	✓			✓	
Bulking installation (Owendo Port)		✓	✓	✓	✓

Tentative Date of Next Visit: November 20, 2023 - November 24, 2023

Total Number of Mandays: 1 mandays

2.2 BSI Assessment Team

Name	Role	Competency
Mohamed Hidhir (MH)	Team Leader	<p>Education: He holds Bachelor Degree in Chemical Engineering from National University of Malaysia</p> <p>Work Experience: He has 7 years working experience in palm oil industry and 5 years specifically on palm oil milling. He is also experiences third party auditing for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO, RSPO P&C, RSPO SCCS, RBA.</p> <p>Training attended: He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course, OHSAS 18001 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed RSPO P&C Refresher Course, MSPO Awareness Training, Endorsed RSPO SCCS Lead Auditor Course, Endorsed RSPO SCCS Refresher Course, Introduction to HCV, HCS & GIS training and SMETA requirement training.</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspects of RSPO SCCS requirements (RSPO SCC Standard & Standard February 2020, RSPO Market Communication and Claims 2019)</p> <p>Language proficiency: He is fluent in Bahasa Malaysia and English.</p>

Accompanying Persons:

Name	Role
Nil	

2.3 Assessment Plan

The Assessment plan was sent to the client prior to the assessment.

Date	Time	Subjects	MHZ
Saturday, 25/03/2023	PM	Auditor travel from Kuala Lumpur via TK61 ETD 2350	√
Sunday, 26/03/2023	PM	Auditor travel to Libreville via TK587, ETA 1955. Check in hotel at Libreville	√
Monday, 27/03/2023	AM	Auditor travel to Bilala	√
Tuesday, 28/03/2023	0830 – 0900	Opening meeting by audit team leader - confirmation of audit scope and audit process.	√
	0900 – 1030	Site tour – Bilala POM (incoming/process/storage/out-going) RSPO Supply chain requirements for mill	
	1030 – 1230	<ul style="list-style-type: none"> - Identity Preserved Module - Internal Audit - Purchasing and Goods In - Sales and Goods Out - Outsourcing Activities (tanker cleaning/flushing process) - Record keeping - Extraction Rate - Processing (tank readiness/cleaning & flushing process) - Registration of transaction - Claims 	
	1230 – 1300	Interim closing for day 1	√
Friday, 31/03/2022 Bulking installation, Libreville	0830 – 1030	5.5. Outsourcing activities – bulking installation (Bilala KCP)	√
	1030 – 1130	5.5. Outsourcing activities – bulking installation (Bilala POM) Plant tour – loading bay control/tank farm management/dispatch bay control	√
	1130 – 1230	Module A (Identity Preserved) – related segregated process at bulking installation <ul style="list-style-type: none"> • A.2 Supply Chain Requirement • A.3 Processing 	√
	1230 – 1300	Closing meeting. Audit conclusion and recommendation	√
	PM	Auditor travel back to Kuala Lumpur via TK540 ETD 1945	√

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	Yes. Olam Palm Gabon has a Time Bound Plan and it includes all of its management units and mills.	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	All units of OPG have been certified. The last on the plan is Graine (Ndende) which was certified in 2022.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available. If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021. <i>Note:</i>	No new acquisition of land.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	Review of the plan does not show any deviation as the estates and mills have been certified as scheduled.	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	There has not been any changes to the plan and this is consistent with the ACOP reporting 2021.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No isolated lapses identified in the implementation of the plan.	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	No fundamental failures to implement the plan. The assessment are been carried out as planned.	Complied
Un-Certified Units or Holdings		
No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	NA as all certification units have been certified.	Not Applicable
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	NA as all certification units have been certified.	Not Applicable
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance	NA as all certification units have been certified.	Not Applicable

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with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.		
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	NA as all certification units have been certified.	Not Applicable
Any Legal non-compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	NA as all certification units have been certified.	Not Applicable
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	NA as all certification units have been certified.	Not Applicable
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	NA as all certification units have been certified.	Not Applicable
Have there been any stakeholder (including NGO) consultation conducted?	NA as all certification units have been certified.	Not Applicable

3.2 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification? OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.	Not applicable as there is no smallholder scheme under the Certification Unit.	Not Applicable

Approved Time Bound Plan

Time Bound Plan for 100% Own Certified FFB

		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 revision					June 15	Oct 16	Feb 17	Jan 18	Jan 19		
	RSPO membership date updated to 9 Oct									Apr 19		
	2006 as per group membership requirement ²											
AWALA	NPP notification	Feb 11										
	RSPO independent gap assessment			Apr 13								
	Mill commissioned					Sep 15						
	RSPO initial certification						June 16					
	RSPO surveillance audit											
Mouila	NPP notification		June 12									
	RSPO independent gap assessment						June 16					
	Mill commissioned							Jan 17				

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	RSPO initial certification							Dec 17				
	RSPO surveillance audit											
Mouila	NPP notification					May 15						
	RSPO independent gap assessment							May 17				
	Mill commissioned										Dec 20	
	RSPO initial certification ³								Dec 18			
	RSPO surveillance audit											
Makouke	Inclusion under Olam RSPO membership						Aug 16					
	RSPO initial certification ⁴									July 19		
	RSPO surveillance audit											
Mouila	NPP notification			Dec 13								
	RSPO initial certification										Dec 20	
	RSPO surveillance audit											
GRAINE	SOTRADER joined RSPO					July 15						
	NPP notification						June 16					
	RSPO independent gap assessment							Dec 17				
	RSPO initial certification ⁵											Dec 21
	100% certification of GRAINE Palm SH											Dec 21

3.3 Details of Nonconformities

The nonconformities are listed below. The findings summary of the assessment by criteria are listed in Appendix A. During this Assessment Zero (0) nonconformities and Zero (0) OFI Opportunity For Improvement raised.

Non-conformity			
NCR Ref #	Nil	Issued Date	
Due Date		Closure Date	
Indicator & Category (Critical / Minor)			
Statement of Nonconformity:			
Requirement Reference:			
Objective Evidence:			
Corrections:			
Root Cause Analysis:			
Corrective Actions:			
Assessment Conclusion:			

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Opportunity for Improvements	
OFI #	Description
1	Nil

Positive Findings	
PF #	Description
PF 1	Good cooperation by management team/staff/sustainability team and readiness towards supply chain model upgrading

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity (not applicable, this is an extension of scope audit)			
NCR Ref #		Issued Date	
Due Date		Closure Date	
Indicator & Category (Critical / Minor)			
Statement of Nonconformity:			
Requirement Reference:			
Objective Evidence:			
Corrections:			
Root Cause Analysis:			
Corrective Actions:			
Assessment Conclusion:			
Effectiveness Closure (for previous audit closed Critical NC):			

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical/Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
2019872-202011M1	Critical	6.7.3	01/12/2020	Closed out on 04/02/2021
2019872-202011M2	Critical	6.2.4	01/12/2020	Closed out on 04/02/2021
2019872-202011M3	Critical	6.6.1	01/12/2020	Closed out on 04/02/2021
2019872-202011M4	Critical	7.2.7	01/12/2020	Closed out on 04/02/2021
2019872-202011N1	Minor	6.7.2	01/12/2020	Closed out on 27/11/2021
2137549-202111-M1	Critical	3.8.12	27/11/2021	Closed out on 27/12/2021
2137549-202111-N1	Minor	1.1.5	27/11/2021	Closed out on 26/11/2022
2137549-202111-N2	Minor	3.1.3	27/11/2021	Closed out on 26/11/2022
2275234-202211-M1	Critical	3.6.1	26/11/2022	Closed out on 31/01/2023
2275234-202211-M2	Critical	6.7.3	26/11/2022	Closed out on 31/01/2023
2275234-202211-N1	Minor	3.3.2	26/11/2022	Open, to be closed in the next annual surveillance audit
2275234-202211-N2	Minor	7.3.1	26/11/2022	Open, to be closed in the next annual surveillance audit

3.4 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Bilala Palm Oil Mill Certification Unit's environmental and social performance, legal and any known dispute issues.

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. Any comment which is not complying to the RSPO P&C requirements have been incorporated as an assessment finding.

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 below.

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Nil		

Stakeholders comment	
1	Feedbacks: Nil
	Audit Team verification and response:

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Government of Gabon	50 years	67,155	Yes	No	Complied



Previous land owner / user comment	
1	Feedbacks:
	Audit Team verification and response:

3.5 Impartiality and conflict of interest

During this assessment there was no circumstances or pressure that had influenced the independence or confidentiality of the assessment team.

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Formal Signing-off of Assessment Conclusion and Recommendation

<p>The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Bilala Palm Oil Mill has complied with the Gabon National Interpretation 2019 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that Bilala Palm Oil Mill is certified.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Mohamed Hidhir Bin Zainal Abidin	Name: Mahamadou DAO
Company Name: BSI Services (M) Sdn Bhd	Company Name: Olam Palm Gabon SA
Title: Lead Auditor	Title: Head of Compliance & Certification
<p>Signature:</p> 	<p>Signature:</p> <p><i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i></p> 
Date: 2nd May 2023	Date: 5th May 2023

Appendix A: Summary of Findings

Since the purpose of the this scope extension audit is to upgrade SCC model from MB to IP and to verify the readiness of IP production, relevant P&C indicators were not audited at this time. In order to comply with audit report which stipulated in RSPO Certification Systems for P&C and RSPO ISH Standard, assessment findings related to P&C from recertification audit done recently are referred in

Criterion / Indicator	Assessment Findings	Compliance	
Principle 1: Behave ethically and transparently			
Criterion 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	<p>(C) Management documents that are specified in the RSPO P&C are made publicly available.</p> <p>- Critical (Major) compliance -</p>	<p>Olam Palm Gabon-Bilala POM has a list of management document that they make publicly available. The documents are made publicly available through display on notice boards in and around the company and also on the company website Ethics & Compliance (olamgroup.com). The company has also shared copies of all such documents with the communities through their chiefs and representatives. Interview with leaders in the Boungounga and Rembo communities all confirmed receipt of the company documents. The company documents include:</p> <ol style="list-style-type: none"> 1. Policy for the protection of reproduction rights 2. Sexual harassment policy 3. Child labour policy 4. Human rights policy 5. Policy on freedom of association and collective bargaining 6. Special labour policy 7. Code of Ethics policy 8. Whistle blower policy 9. HSE policy 	Complied

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		<p>10. Policy on equal opportunities in employment</p> <p>11. Forced labour policy and trafficking, contract substitution and immigrant and temporary workers</p> <p>12. The procedure for handling external complaints</p> <p>13. Protection policy for protected areas</p> <p>14. The procedure for the management of areas with High Conservation Values</p> <p>15. The communication and consultation procedure</p> <p>A visit to the company's notice board showed some of the documents on displayed.</p>	
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>The official written and spoken language in Gabon is French and as such all their information are documented in French and shared with all relevant stakeholders. Interview with the Human Resource manager established that the company uses the French language in all communications with their stakeholders. During field visit to the estates and interview with the workers indicates although there are local languages in the Gabon, French is the most commonly use language in all communications. Based on review, the documents mentioned in the Indicator 1.1.1 were all available in French and accessible to all relevant stakeholders upon request.</p>	Complied
1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>The company has received request for information during the period under review. These information are recorded in a log book which was made available for review. There were no request for information from the stakeholders at the time of this audit.</p>	Complied
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.</p> <p>- Critical (Major) compliance -</p>	<p>The company has a documented procedure captioned Procedure de Consultation et de Communication Avec les Communautés Locales dated 02/07/2012. The procedure reviewed provides information on how the company receives information and the timelines for responding to all</p>	Complied

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		information received. Interview with the communities confirmed the procedure has been shared and communicated to their understanding.	
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -	The company maintains a list of their stakeholders which was made available to the audit team for review. The list of stakeholders are Local administrators, community representatives, NGO, workers’ representatives, Health and safety committee, gender committee and contractors. The for each stakeholder identified, there is a provision for the contact name and number.	Complied
Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. - Minor compliance -	<p>OPG-Bilala has a documented code of conduct and Anti-Bribery and Corruption policy with the objective of conducting business in compliance with the letter and spirit of the law and other accepted standards of business conduct and to maximize shareholder value for its continuing shareholders in an ethical and environmentally sustainable manner.</p> <p>in place and it describes the set of rules and values for the organisation. The values of the company listed in their code of ethics includes</p> <ol style="list-style-type: none"> 1. Anti-Bribery 2. Harassment 3. Health and Safety 4. Drugs and Alcohol use 5. Diversity and Inclusion 6. Integrity <p>These values are communicated to the workers during induction of new workers, awareness programmes, display on the notices boards and morning musters. The policy has also been shared with the communities and contractors. Interview with the Rembo and BOUNGOUNGA communities all confirmed the policy has been shared and communicated to their understanding. The audit team also reviewed records of training with pictorial</p>	Complied

		evidence of training of the company’s policies including the code of conduct policy to their third-party contractors. Documented evidence of sharing copies of the policy to the third-party contractors were also reviewed.	
Principle 2: Operate legally and respect rights			
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	<p>(C) The unit of certification complies with the applicable legal and regulatory requirements.</p> <p>- Critical (Major) compliance -</p>	<p>Olam Palm Gabon keeps an updated lists of all applicable laws as evidenced in “List of Laws Applicable to Plantations and Mills of Olam Palm Gabon”. Document No. 01/LEG LIST/0522 of 05/2022.</p> <p>Additionally, some laws were sampled to verify OPG conformity. For instance: In conformity with Law No. 002/2014 of February 6th 2017 obliging any person working in Gabon to subscribe to the Social Security Regime. Workers payslips were reviewed and confirmed to be registered with the national social security fund (CNSS).</p> <p>In conformity with environmental regulations, OPG has reviewed their social and environmental management and monitoring plan as evidenced in Plan de Gestion Environnemental et Sociale - Etude d’Impact Environnemental et Social de la Plantation de Palmier a Huile d’Olam Palm Gabon (OPG), Mouila Lot 1. (Updated Version (November 2022), produced by Ecosphere.</p>	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations in force, including listing and evidence of legal due diligence of all contracted third parties, recruitment agencies, service providers and labour contractors.</p> <p>- Minor compliance -</p>	<p>Olam Palm Gabon keeps an updated lists of all applicable laws as evidenced in “List of Laws Applicable to Plantations and Mills of Olam Palm Gabon”. Document No. 01/LEG LIST/0522 of 05/2022. Additionally, a legal audit is conducted on an annual basis to keep track of changes in laws. The legal audit covers the following aspects:</p> <ul style="list-style-type: none"> • Social Security provisions • Environmental Law aspects • Fiscal laws requirements 	

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		<ul style="list-style-type: none"> • Alignment of the content of Sub-contractor contracts • Security of transportation of personnel and goods • Audit of labour laws requirements <p>OPG has equally subscribed to the Official Journal of Gabon, a government-owned outlet that publishes official news, including changes in laws.</p>	
2.1.3	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>OPG has signed an agreement with the government of Gabon authorising them to use the land (Convention No 0006 of 13 November 2012 between OPG and the government of Gabon). Following on this convention, OPG has developed concession maps and put in place a boundary management system based on boundary pillars to demarcate their concession. Additionally, OPG uses drones to monitor their boundaries.</p> <p>Field visits to boundary pillars and collection of GPS points was consistent with OPG’s boundary map e.g.</p> <p>Boundary Pillar F: E: 10°48’23.4” S: 01°35’10.3”</p> <p>Field observations did not reveal any planting beyond the concession limits.</p>	
<p>Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.</p>			
2.2.1	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>The company maintains a list of all their contracted parties in the stakeholder list for both Lot 1 and Lot 2. There are 32 listed contractors in Lot 1 whiles in lot 2 there are 36 contractors.</p> <p>The contractors are categorised into Agricole transport activities. Some of the contracted parties on the list are La Semence du Gabon, Bigis Transport, SAPGA, Ouedruogo Services, Kilis Environment and Transport Service Agric. The audit team reviewed sampled contract documents and all were found to be valid.</p>	Complied

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2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>- Minor compliance -</p>	<p>Reviewed contract of agreement between La Semence du Gabon, Bigis Transport, SAPGA, Ouedruogo Services, Kilis Environment and Transport Service Agricole and Olam Palm Gabon-Bilala. All contracts contain clauses on meeting applicable legal requirements.</p> <p>The audit team reviewed their business registration permit and annual license payment, and all were found to be compliant.</p>	Complied
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>- Minor compliance -</p>	<p>Reviewed contract of agreement between La Semence du Gabon, Bigis Transport, SAPGA, Ouedruogo Services, Kilis Environment and Transport Service Agricole with Olam Palm Gabon-Bilala. All contracts contain clauses on disallowing child, forced and trafficked labour.</p> <p>Review of sampled workers files and field observations did not establish the use of young workers in the operations of the company.</p>	Complied
Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Proof of the ownership status or the right/claim to the land by the grower/smallholder • Where applicable, valid commercial license, or is part of a cooperative which allows the buying and selling of FFB. <p>PROCEDURAL NOTE:</p> <p>The proof of the status or the right of ownership can be considered at first by the departmental exploitation contract. See decree N° 01497 of December 29, 2011, or the document of the ANUTTC.</p> <p>- Critical (Major) compliance -</p>	<p>Since the last assessment, Bilala POM only processes FFB from its own certified supply bases and other certified estates owned by Olam i.e., Mouila Lot 3, which is under OPG-Dola Certification Unit. All the required information was made available for verification by the mill.</p>	Complied
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the</p>	<p>There has been no FFB sourced from indirect supplier since the last assessment.</p>	Complied

	evidence as listed in Indicator 2.3.1. PROCEDURAL NOTE: For Implementation Procedure for 2.3.2 refer to Annex 4. - Minor compliance -		
Principle 3: Optimise productivity, efficiency, positive impacts and resilience			
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.			
3.1.1	(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders. - Critical (Major) compliance -	Business or management plan of the certification unit was developed by having an annual budget and management plan with a 7-year projection. The projection covers the FFB forecast, extraction rate (OER & KER), direct cost (upkeep, fertilizer, R&D, mechanization, upkeep tools, harvesting, mill processing and overhead - manager & staff emolument) and indirect cost (corporate allocation). The company does not have Scheme Smallholders in their operations.	Complied
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -	There is no replanting programme for the next five years at all the sampled estates. The oldest palms were planted in 2013 for Lot 1 and 2014 for Lot 2.	Complied
3.1.3	The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken. - Minor compliance -	The last management review meeting was held on 11/08/2022, covering the entire certification unit. It was chaired by the Mr Dao Mahamadou (Head of Compliance & Certification) and attended by 18 key personnel from various department such as Agronomy, HR, Sustainability, Finance, Operations, Legal, and Administration to name a few. Based on minutes of meeting, among the agenda discussed were: 1) Results of internal audits – agenda #1 2) Customer feedback – agenda #2 3) Process performance and product conformity – agenda #3 4) Status of preventive and corrective actions – agenda #4 5) Follow-up actions from previous management reviews – agenda #5	Complied

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		6) Changes that could affect the management system – agenda #6 7) Recommendations for improvement – agenda #7	
Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.			
3.2.1	(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification. - Critical (Major) compliance -	OPG implements its action plan for continuous improvement Some concrete actions include: Reduction in use of pesticides through analysis of chemical used/trends (Chemical Application Trends Mouila Lot 1 Plantation. Last Update 16 November 2022.), annual leaf sampling to identify actual need for inorganic fertilizer and effective use of chemicals, planting of beneficial plants according to the OPG Manual and owl breeding program), by 2 nd quarter 2016. Person responsible is GM Agronomy and R&D. Minimization of environmental impacts through sites improvement based on findings from agronomy audit, annual erosion monitoring on patches of hilly terrain, soil survey to be conducted once every 5 years, application of empty fruit bunches, establishment of land cover crops.	Complied
3.2.2	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template. - Minor Compliance -	As part of the monitoring and continuous improvement process, OPG has submitted its RSPO metrics template. The template was filled out by OPG sustainability manager and was verified during the audit.	Complied
Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.			
3.3.1	(C) Standard Operating Procedures (SOPs) for the unit of certification are in place. - Critical (Major) compliance -	The Mill operations are guided by the Standard Operating Procedures for Palm Oil Mill, version 1: 2015, whereas the estates’ operations are guided by Agriculture Policy Manual, April 2013.	Complied
3.3.2	A mechanism to check consistent implementation of procedures is in place.	Apart from daily routine supervision by the management staff, the sampled management units have their mechanism to monitor the implementation of	Non-compliance

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	- Minor Compliance -	their procedures, which among others through Internal Audit, advisory visits, and workplace inspection by Safety & Health Officer. However, the checking of consistent implementation of a procedure was not effectively demonstrated. It was found that there were 2 workers (#016065 and #001122), respectively from Estate 6 and Estate 3 who were, according to the bio-metric system, assigned to chemical spraying in Jul & Aug 2022 (for worker #016065), and Jun & Sep 2022 (for worker #001122), prior to undergoing any medical examination by an appointed doctor. This is not in-line with the company's SOP on Medical Check of Chemical Operators, SOP No. 13/SD-MC(0)/0820, rev.0, Clause 5.a. Thus, a non-conformity report was assigned.	
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	Records of monitoring with regards to EHS and RSPO implementation are maintained and made available for verification. Among the records of monitoring verified were the internal audit reports and workplace inspection reports. The operating units have taken necessary corrective actions for all the lapses identified through these mechanism. Although some records are promptly to demonstrate to auditor at the time of the audit, it may lead to future nonconformity if the retention method of some records such as "Notification D'accident de Travail" and workplace inspection "Imperative 3", which can further affect the retrieval time, is not addressed.	OFI
Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.			
3.4.1	(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders, and including the impacts of any smallholder/ outgrower scheme is documented - Critical (Major) compliance -	OPG has conducted an Environmental Impact Assessment titled: Environmental Impact Assessment related to the development of a Palm Plantation in the Zone of Mouila, Lot 1) of May 2012, Conducted by Ecosphere Sarl (BP, 655 Libreville Gabon). OPG has equally conducted an Environmental Impact Assessment (Etude d'Impact Environnemental, Implementation d'Une Palmeraie dans la Zone de Mouila Lot 2, Olam Palm Gabon, Rapport Final Incluant les Recommendations	Complied

		de la DGEPN, Avril 2014, Ecosphere Sarl, B.P. 655 Libreville-Gabon. The study included final recommendations from the national ministry of Environment.	
3.4.2	For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders. - Minor Compliance -	Based on the SEIA studies, OPG has developed a social and environmental management and monitoring plan titled: Plan de Gestion Environnemental et Sociale - Etude d'Impact Environnemental et Social de la Plantation de Palmier a Huile d'Olam Palm Gabon (OPG), Mouila Lot 1. (Mise a Jour (Novembre 2022), produced by Ecosphere. The plan contains evidence of participation of different stakeholders (village communities, and government agencies) during the development process.	Complied
3.4.3	(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. - Critical (Major) compliance -	The SEIA management and monitoring plan is implemented, reviewed and updated annually in a participatory way with both communities involved and the governmental authorities. The 2022 review was seen during the audit. Minutes of meetings with local communities in preparation of the 2022 review were seen during audit. Meetings held on 4, 9, 11, 13, 16, 18 November 2021 by OLAM Social team in Lot 1. Villages concerned included: Guidouma, Mboukou, Moutambe Sane Foumu, guiamba, Saint-Martin, Rembo, Doubou. Positive aspects included: reduction of unemployment in villages, protection of sacred sites, respect of concession boundaries by OPG. Major issues included proliferation of elephant attacks in the villages. Based on this, there was a review of the SEIA management plan for Lot 1. For Lot 2: Reports dated 7/12/2021 of meetings held in Boungounga, Diangui, Kanana, Lamberene Kili and Fanguidaka on review of the PGES.	Complied
Criterion 3.5: A system for managing human resources is in place.			

<p>3.5.1</p>	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives.</p> <p>- Minor Compliance -</p>	<p>The company has documented procedures for that guides the recruitment of expatriates, communities and Gabonese. The procedure for the communities is a result of an agreement with the company to give priority to the communities whenever there are the need for workers. Interview with the Human Resource manager confirmed the categorization of expatriate as non-citizens of Gabon The procedures are</p> <ol style="list-style-type: none"> 1. Procedure Interne de Recruitment de Travailleurs Entrangers, referenced 001/03/2016/RH/GT dated May 2016 2. Procedure d’embauche Prioritaire referenced MLA1-PRO 5-CRSS dated June 2015 3. Procedure de Recrutement des Employes Nationaux referenced 2708/2016RH/JM dated 27/08/2016 <p>A review of the procedure for expatriate workers shows the following</p> <ol style="list-style-type: none"> a. Job Advertisement of the position b. Acceptance of Job offered c. Provision of the all necessary document by the candidate d. Submitting such documents to the company e. Arrival of candidate in Gabon and meeting with the company HR manager and medical test f. Acceptance and signing of the contract g. Issued with a foreign worker’s card h. Issuance of a Visa card <p>The procedure for recruitment of a Gabonese is as follows</p> <ol style="list-style-type: none"> 1. Job Advertisement 2. Selection of CVs 3. Interview by Head of Departments 	<p>Complied</p>
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		<ol style="list-style-type: none"> 4. Selection of qualified applicant 5. Approval of budget 6. Job Appointment 7. Medical test 8. Complete a personal form <p>The procedure has been shared with the workers through the workers' union. This was confirmed during interview with the union.</p>	
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>The company keeps records of all recruitment of their employees. However, interview with the HR manager indicates the company has not undertaken any recruitment of citizens this year. However, there has been recruitment of expatriate this year. Twelve of the expatriates were interviewed during a visit to Estate 08 and information provided during the interview confirms the company followed their own procedures in the recruitment process.</p>	Complied
<p>Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.</p>			
3.6.1	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The certification unit has risk assessed all the activities in their operations which includes harvesting, nursery, chemical spraying to name a few. The assessment report is captioned "Register of the Risk Analysis About Health and Safety at Work" which was last revised on 26/06/2022 (BPOM), and 01/07/2022 (estates). The mitigation plans were developed thereafter to address all the identified risks. The report as reviewed has the following information:</p> <ul style="list-style-type: none"> • Major Activity/Area • Description of the activity • Danger • Risk Related to the danger • Risk evaluation • Level of Risk • Counter Measure • New Counter Measures 	Non-compliance

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		<p>SOPs were developed thereafter as regulations to be implemented to minimize the identified risks.</p> <p>However, Some H&S risks were not identified such as follows:</p> <ol style="list-style-type: none"> 1) At Bilala POM, there was an accident happened on 06/08/2022 where a worker fell his foot in a drain that contained hot water near the kernel bunker. Due to the injury, he was given medical leave from 06/08 to 12/09/2022. However, the risk from this incident was not assessed in the S&H Risk Evaluation. 2) Based on site visit at the FFB stockpile at Estate 9, field no. K7, the FFB truck driver has demonstrated that in order to put on the net to cover the FFB in the truck bin, he has to be on top of the truck which is significantly high without attached to any safety harness. However, the risk of working at height for this activity was not identified in the S&H Risk Evaluation. <p>Thus a non-conformity report was assigned due to this lapse.</p>	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Apart from daily routine supervision, among the methods to monitor the effectiveness of the H&S plan are SHO Workplace Inspection, internal audits, safety committee meetings, and annual medical surveillance. Records of monitoring were made available for verification by the sampled management units. Over times, generally the number of accidents had been observed to be declining which indicates the H&S plan is effective.</p>	Complied
Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.			
3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	<p>The last training on SCCS was conducted on in a few sessions, i.e.:</p> <ul style="list-style-type: none"> - 14/03/2022 for mill manager and assistant, weighbridge laboratory and mass balance accounting - 20/03/2023 for contractor (GZES and Mount Meru Logistics Gabon) 	Complied
Criterion 3.8: Supply chain requirement for mills			

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3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>Bilala POM is deemed to be Identity Preserved (IP) due to FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C). The certified estates namely under Lot 1 plantation (Estate 1, 2 , 3, 4 ,5 and 6) and lot 2 plantation (Estate 7,8 and 9).</p>	Complied
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply 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>Mass balance model is no longer valid as Bilala POM is going for IP model upgrading. Thus, this requirement is not applicable.</p>	Not Applicable
3.8.3	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall 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 for forecast IP production. The actual tonnage produced from last audit date (Nov 2021– Oct 2022) is reported in the summary in Table 6. No sales of MB product after the last audit in November 2022 until March 2023.</p>	Complied
3.8.4	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	<p>The registration of PalmTrace will be carried out by the Global Trade Marketing Department, HQ. All transaction will be registered in the PalmTrace. Company has registered their mill in the PalmTrace:</p>	Complied

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		<p>Members ID: RSPO_PO1000006576</p> <p>Licence validity: 28/03/2023 to 27/12/2023</p> <p>Member category: Oil Mill</p> <p>Supply chain model to upgraded to Identity Preserved.</p>	
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role 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 mill's procedures for the implementation of this standard. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill. 	<p>Upgrading model for Identity Preserved (IP) system and readiness are in place. Interview with the person in-charge, he is aware of the upgrading process as guided by its supply chain procedure Standard Operating Procedure (SOP) Supply Chain & Traceability (Identity Preserved and Segregated Model) (Doc. No.: OPG_POM-KCP-SC/IP-SG (01)/0123, version:1, dated 17/01/2023.</p> <p>The procedure covers the subjects on responsibility, reporting of certified CPO/PK, non-conforming products and/ or documents, FFB delivery Plantation to Mill, CPO/PK delivery Mill to customer, record keeping, training, complaints, management review and product claim.</p> <p>The mill has conducted SCCS SOP & Policy training to the critical control point personnel such as weighbridge operator, clerks, and QA supervisor. Details of training are described in Indicator 3.7.1.</p> <p>Based on Standard Operating Procedure (SOP) Supply Chain & Traceability (Identity Preserved and Segregated Model) (Doc. No.: OPG_POM-KCP-SC/IP-SG (01)/0123, version:1, dated 17/01/2023 the Mill Manager and the Assistant Manager are the assigned persons to have the overall responsibility for implementation of the SCCS.</p> <p>Under 6.1. Purchasing And Goods In (Identity Preserved / Segregated), for the given POM with IP Supply Chain certification model, it is prohibited to receive FFB from non-certified plantations.</p>	Complied
3.8.6	<p>Internal Audit</p> <ul style="list-style-type: none"> i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill: 	<p>The mill has last conducted the internal audit on 13/03/2023 in accordance with the internal audit procedure which is addressed in the facility's Standard Operating Procedure (SOP) Supply Chain & Traceability (Identity Preserved and Segregated Model) (Doc. No.: OPG_POM-KCP-SC/IP-SG (01)/0123,</p>	Complied

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	<p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>version:1, dated 17/01/2023 under 6.1: Internal Audit and Management Review. Written in the SOP, the frequency of internal audit is once a year. The internal audit has also covered the RSPO Market Communications and Claims elements.</p> <p>There were 2 NCs and 1 Observation raised as a result of the internal audit with regards to training and procedure requirements. The NCs were closed on 25/3/2023. The internal audit has been discussed and recorded in the last management review minutes of meeting which was conducted in 13/03/2023.</p>	
<p>3.8.7</p>	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>The mill has received Olam PG certified FFB from its own supply base i.e., Mouila Lot 1 and Mouila Lot 2. No FFB from any third party received as to maintain no contamination of non-certified FFB.. Each trip of FFB sent to the mill using FFB truck is accompanied with FFB Dispatch chit which has the information about field no., estate name, truck registration no., RSPO certificate no., number of bunches, and weights (gross & nett).</p> <p>The management will inform CB should there are any overproduction of certified tonnage. Nonetheless, based on the mass balance sheet and production report, there has been no overproduction recorded. The mechanism for handling non-conforming FFB and/or documents addressed in Standard Operating Procedure (SOP) Supply Chain & Traceability (Identity Preserved and Segregated Model) (Doc. No.: OPG_POM-KCP-SC/IP-SG (01)/0123, version:1, dated 17/01/2023. Under 6.1 (e) Purchasing and Goods In; the mechanism for handling certified and non-certified materials (PK and PKO), weighbridge clerk/operators to consult with mill manager if they are in doubt on the source/ origin (certified or non-certified) of the raw materials. In such events, raw material transport vehicles would be denied entry and product discharge until proper clarification is sought and authorization given from the authorized personnel. When the supply Chain Certification of a raw material of a supplier is found to be invalid, it should</p>	<p>Complied</p>

		<p>be brought to the notice of the Mill Manager, who would then decide on course of action and/ or classify it as a non-certified source which must be rejected.</p>													
<p>3.8.8</p>	<p>Sales and Goods Out The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<p>For CPO sales, all the required information of this indicator in various documents such as dispatch tickets, commercial invoice, bill of lading, and sales contracts, to name a few. With regards to PK transaction, the mill is integrated with Mouila Bilala Kernel Crushing Plant. Certified palm kernel is directly transferred to the KCP via conveyor. Verification of the mock traceability calculation Sheet, showed that the movement of certified material and products was correctly recorded. If there is any sales of IP product, related details for especially the SCC model IP will be appeared on the weighbridge ticket using manual rubber stamped. Verification of the mock traceability calculation sheet able to capture the stock at 4 kernel bunker (400 mt capacity, 100 mt per bunker) and 4 kernel silo (120 mt capacity, 30 mt per silo).</p> <p>Stock as at 28/3/2023 recorded as per below:</p> <table border="1" data-bbox="1025 944 1335 1311"> <thead> <tr> <th>Kernel bunker no.</th> <th>Stock (mt)</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>77.4</td> </tr> <tr> <td>2</td> <td>46.1</td> </tr> <tr> <td>3</td> <td>62.3</td> </tr> <tr> <td>4</td> <td>113.8</td> </tr> <tr> <td>Total</td> <td>299.6</td> </tr> </tbody> </table>	Kernel bunker no.	Stock (mt)	1	77.4	2	46.1	3	62.3	4	113.8	Total	299.6	<p>Complied</p>
Kernel bunker no.	Stock (mt)														
1	77.4														
2	46.1														
3	62.3														
4	113.8														
Total	299.6														

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Kernel silo	Silo Level (%)	Stock (mt)
1	90	77.4
2	85	46.1
3	80	62.3
4	85	113.8
Total		299.6

Stock dumped on the floor: 299.55 mt

Process for clearing off CSPK MB infeed/stock will be further verified in the next surveillance audit. Once Bilala POM upgraded to IP model, no CSPK MB can be claimed and transferred to Bilala KCP.

Stock as at 28/3/2023 recorded as per below:
 CPO tank 1 (2,000 mt): Emptied, man hole opened (CPO IP tank), in process of cleaning.
 CPO tank 2 (2,000 mt): Dead stock, man hole still in closed. In process of cleaning.
 CPO tank 3 (2,000 mt): 34.14 mt (MB dead stock)
 CPO tank 4 (2,000 mt): 113.66 mt (MB stock)
 CPO tank 5 (3,000 mt): 1,925.08 mt (MB stock)
 CPO tank 6 (3,000 mt): 196.36 mt (MB stock)

For first IP production, all RSPO products and in the production line (tanks/silos) will be drained out and emptied. A flushed volume will be used as to clear remaining balance in the production. Once Bilala POM upgraded

		to IP, all MB stock and can only be sold as conventional. This process will be further checked in next assessment.	
3.8.9	<p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where the mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>The mill does not outsource any of its milling activities to any third party. The mill outsources its CPO transportation and storage in New Owendo International port to OPG subsidiary logistic company, Gabon Special Economic Zone (GSEZ) and the new transporter, Mount Meru Logistics Gabon. The main Service Level Agreement (SLA) on the provision on logistic services with the extension for the provision of end-to-end export logistics services for CPO/CPKO exports effective from 23rd May 2018 with reference to initial SLA/MOU dated 10/10/17. Verification of addendum contract between OPG and Gabon Special Economic Zone (GSEZ) dated of 30/5/22 and as to extend the contract validity and renewal of the said SLA. Within the scope of the contract stated:</p> <ul style="list-style-type: none"> - Provide flexi bags CPO exports in containers - Inland transport to bulking facility - Bulking storage <p>Stated in the addendum contract on RSPO supply chain compliance declaration which signed on 30/4/2020 by GSEZ representative. Additionally, a new transporter Mount Meru Logistics Gabon has been appointed as outsourced transporter. Service Level Agreement (SLA) signed on 3/2/2023 between OPG and the company.</p> <p>Although there is no outsource activity for processing, by this enforceable contract agreement and addendum, the mill has the assurance mechanism that the requirements of this Indicator #ii) a) to d) are somehow met by the logistic contractor.</p>	Complied

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3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	The mill keeps the names and contact details of person in-charge of GSEZ and Mount Meru Logistics Gabon. This is verifiable through email correspondence between OPG and the outsourced provider.	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	Addressed Standard Operating Procedure (SOP) Supply Chain & Traceability (Identity Preserved and Segregated Model) (Doc. No.: OPG_POM-KCP-SC/IP-SG (01)/0123, version:1, dated 17/01/2023 where OPG is to update all outsourced contractor(s) i.e., name and contact details at least one a year in the stakeholder list. The new contractor (i.e., Mount Meru Logistics Gabon) updated in the list. Nonetheless, Mount Meru Logistics Gabon is registered in the SAP system.	Complied
3.8.12	<p>Record keeping</p> <ul style="list-style-type: none"> i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. iv) For Mass Balance Module, the mill: <ul style="list-style-type: none"> a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. 	<ul style="list-style-type: none"> i) All the sampled mock records (IP production) related to the movements of RSPO certified materials and products were found to be accurate, complete, up-to-date, and accessible. ii) The retention period for maintaining the traceability records is 5 years as stated in the clause 7 (verification) of the Supply Chain & Traceability (Identity Preserved and Segregated Model) (Doc. No.: OPG_POM-KCP-SC/IP-SG (01)/0123, version:1, dated 17/01/2023 iii) The mock traceability calculation sheet, has shown the stock balance at mill and ex-mill (Owendo Port bulking installation). Records of balance of all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. iv) MB module is no longer valid for Bilala POM. 	Complied

	c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.		
3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	Conversion factor of CPO and PK production is depending on the actual OER and KER. Nonetheless, in forecasting the future productions, the OER and KER are estimated based on past experience and performance. It was verified that the estimated OER and KER mentioned in Table 10 are in line with the mill's previous performance.	Complied
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	The facility is using the actual extraction rate and therefore updating of rates is not necessary. Nonetheless, in forecasting the future productions, the OER and KER are estimated based on experience and performance. It was verified that the estimated OER and KER mentioned in Table 10 are in line with the mill's previous performance.	Complied
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>Standard Operating Procedure (SOP) Supply Chain & Traceability (Identity Preserved And Segregated Model) (Doc. No.: OPG_POM-KCP-SC/IP-SG (01)/0123, version:1, dated 17/01/2023 has clearly defined the protocols to ensure RSPO certified oil palm product is kept separate from non-certified oil palm products and oil palm products from other certified mills, including during transport and storage to strive for 100% separation.</p> <p>In case there is contamination/mixture of the raw materials with non-certified raw materials, the resulting CPO respectively non-certified CPO and is stored in a special storage tank dedicated to uncertified storage tank.</p> <p>Other related protocols under section (h) of the said SOP;</p> <p>h) When the IP palm oil products from different Mills are mixed during transportation or storage process, the supply chain model of the total volume must be downgraded to non-certified.</p>	Complied

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		<p>Downgrading process will be for CPO and PK:</p> <p>IP + IP = conventional (applies for both mill and bulking installation/tank farm)</p> <p>Another SOP on Tanks And Tankers Cleaning, Document No.: OPG_TC-(01)/0123, version 1 dated 17/1/23 has been established to ensure no cross contamination of product should the tank use change like from MB oil to IP/SG oil or from a type of oil to another like from CPO to PKO. The procedure applies to all cleaning operations of storage tanks belonging to OPG (Mills/ Tank farm at the Port) and also to the cleaning process of the tankers transporting OPG products. As part of implementation to demonstrate compliance, the below reports required to be kept as such:</p> <ul style="list-style-type: none"> a) Each internal tanks/tankers cleaning operation must be subject to proper record keeping using the template put in annex. b) When the cleaning is done externally (e.g. Tankers) by third party, the record keeping must refer to the cleaning report/certificate from the concerned third party if applicable. c) In case, the third party in charge of the cleaning does not have a cleaning report, the internal form will be used for the record keeping. <p>As for CPO IP tank preparation, in the annex for tanks/tankers cleaning form CPO T1 (2,000 mt) still in the process of cleaning 1/3/23. Inspection and validation will be done once cleaning process has been completed.</p> <p>Status of tank preparation by 28/3/2023;</p> <p>CPO tank 1 (2,000 mt): Emptied, man hole opened (CPO IP tank), in process of cleaning.</p> <p>CPO tank 2 (2,000 mt): Dead stock, man hole still in closed. In process of cleaning.</p> <p>CPO tank 3 (2,000 mt): 34.14 mt (MB dead stock)</p>	
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		<p>CPO tank 4 (2,000 mt): 113.66 mt (MB stock) CPO tank 5 (3,000 mt): 1,925.08 mt (MB stock) CPO tank 6 (3,000 mt): 196.36 mt (MB stock)</p> <p>Ex-mill tank preparation (Owendo port, OPG GGL TANK FARM) CPO (tank# 3: 1,500 mt, tank# 7: 2,000 mt, tank# 9: 1,500 mt, tank# 10: 750 mt, tank# 11: 750 mt) 5 new tanks allocated for Bilala POM IP production (6,500 mt).</p> <p>For first IP production, all RSPO products and in the production line (tanks/silos) will be drained out and emptied. A flushed volume will be used as to clear remaining balance in the production. Once Bilala POM upgraded to IP, all MB stock and can only be sold as conventional. This process will be further checked in next assessment.</p>	
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>i) The registration of PalmTrace is carried out by the General Manager of Sustainability in Head Office. All transaction will be registered in the PalmTrace. As for IP module, related transaction will be further verified in the next audit.</p> <p>ii) N/A as no RSPO certified volumes sold under different scheme or as conventional under IP model.</p>	Complied
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>Should there be any claims regarding the production of RSPO certified oil to be made, the facility will comply with the RSPO Rules on Market Communications and Claims. This is also addressed in the company's Standard Operating Procedure (SOP) Supply Chain & Traceability (Identity</p>	Complied

		Preserved and Segregated Model) (Doc. No.: OPG_POM-KCP-SC/IP-SG (01)/0123, version:1, dated 17/01/2023.	
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	Corporate communication is made at the parent company Olam Palm Gabon SA level i.e., the RSPO member. The company's statement of supporting the RSPO can be seen at its official website https://www.olamgroup.com/products-services/olam-global-agri/edible-oils/sustainable-palm-oil.html	Complied
4.2	In corporate communications a member is allowed to: a. Display its RSPO membership status b. Display the RSPO web address (spo.org) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress spo.org' where the link must lead to the member's profile page.	Based on verification of the OPG's website, there was no breach of the general corporate communications requirements and OPG does not use the RSPO trademark.	Complied
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	There was no statement made by OPG that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Complied
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	There was no communication statement made by OPG SA that can mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	Complied

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4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No evidence of RSPO corporate logo used by the mill and this was verified through document and site review (notice board, business card, shipping documentation, etc.).	Complied
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Business to business communication was demonstrated via shipping documentation and invoices to the next supply chain actor or buyer.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Business to business communication is through the delivery documents. There is no use of trademark logo. Only the communication with RSPO certification number and supply chain model sighted in the weighbridge tickets. As for IP production, the new supply chain model (IP) and certificate will be appeared in the shipping documents.	Complied
5.3	<p>Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:</p> <ul style="list-style-type: none"> a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation. b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2. 	Not applicable as the mill is not a distributor or wholesaler.	Not Applicable

MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES			
Certified oil palm content (IP)			
	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	Bilala POM producing CPO which has 100% IP certified oil palm content.	Complied
	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	NA as the mill opted for IP model.	Not Applicable
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.	Not applicable. This is an extension of scope audit.	Not Applicable
Labelling and trademark (IP)			
	Members are allowed to use the RSPO label in one of the following ways: <ul style="list-style-type: none"> • RSPO trademark which includes the tag 'CERTIFIED' or • RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack. 	Not applicable. This is an extension of scope audit.	Not Applicable
Messaging (IP)			

	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> • The oil palm products contained in this product have been certified to come from RSPO sourcespo.org • By choosing this product, you are sure it contains RSPO-certified palm oil. For more informatiospo.org • RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chaispo.org • Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantationspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditorspo.org • RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org • References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. 	<p>Not applicable. This is an extension of scope audit.</p>	<p>Not Applicable</p>
<p>Principle 4: Respect community and human rights and deliver benefits</p>			
<p>Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRDs), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation, corruption and harassment by the unit of</p>	<p>The company has a documented human rights policy captioned Politique de respect des droits Humains dated 01/09/2019. The policy makes provision for prohibiting retaliation against human rights defenders (HRDs). Interview with community representatives in Boungounga and Rembo communities and harvesters in Estate 08 (block I08) during this audit period did not establish human abuses in the operations of the company.</p>	<p>Complied</p>

	certification and contracted services, including contracted security forces. - Critical (Major) compliance -		
4.1.2	The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations. - Minor compliance -	Interview with the Boungounga and Rembo community members and workers in estate 08 did not establish the use of violence or use any form of harassment, including the use of mercenaries and paramilitaries in the operations of the company.	Complied
Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRDs, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRDs. - Critical (Major) compliance -	The company has a documented procedure for handling grievance captioned Procedure de Gestion des Plaintes est Reclamations referenced SOP N°07/SD-GP (9)/0622 and dated 16/06/2022. The documented procedure outlines the process for addressing internal grievances, external grievance (communities) and grievances from the mill. For each category of grievance, the procedure make provision for a timeline for resolving the complaints submitted. The procedure also states that the complainant can request for anonymity when filing a complaint. The company maintains a file for all complaints received and also records a summary of all the activities towards resolving the grievance in a logbook. The logbook was made available for review and there were records of complaints for the year under the audit. The logbook has heading for information, the date the complaint was made, date the company recorded the information, complainants name, description of the complaint, proposed solution among others.	Complied
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance -	Interview with the representatives from the Boungounga community confirms the procedure has been shared and explained to their understanding. They stated that the company has also shared copies of the grievance forms which they can fill to file a complaint. However, the community indicated that they have stop sending complaints to the company due to the delay in response from the company. Although the community could not present any evidence for the audit team to follow up, this is raise	OFI

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		as an OFI for the company to enhance their engagements with the communities.	
4.2.3	The unit of certification keeps parties affected by a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. - Minor compliance -	The procedure review indicates the company will keep communities informed at all times of the outcomes of the complains either in writing, verbal or by SMS.	Complied
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. - Minor compliance -	The procedure makes provisions for the complainant to choose a legal representative, any person or institution of their choice to assist them.	Complied
Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local communities are realised and documented. - Minor compliance -	The company has negotiated agreement with all communities in the operational area. Based on the agreement the company has developed an action plan towards the implementation of the project activities. The document captioned Chronogramme de Realisation des Projets Sociaux des Villages du Lot 2 is dated 05/09/2022. A review of the action plan shows the document has been signed by all the representatives of the communities. The effectiveness of the communication about the action plan to the communities and to a local NGO (Brain Forest) can be further improved as most of the community representatives are illiterates.	OFI
Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
4.4.1	(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed (FPIC) process. Documents	The right to legal use of land for Olam Palm Gabon was the result of an agreement between the government of Gabon and the company. Documents showing legal rights to the use of land by the company was made available	Complied

	<p>related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>to the audit team. The documents as reviewed shows right to land use was issued by the Award Decree of:</p> <p>lot 1, granting the Company OLAM PALM, an Associated forestry permit (P.F.A) N ° 74/11 covering an area of 35,354 hectares for the implementation of the oil palm plantations of 11/09/2011.</p> <p>Lot 2: granting the Company OLAM PALM, an Associated forestry permit (P.F.A) N ° 74/12 covering an area of 31,800 hectares for the implementation of the oil palm plantations of 20/01/2012.</p> <p>Interview with the communities during the audit interview confirmed land for Olam operations are state land and were legally acquired from the state. They indicated none of the communities contributed land for Olam operations and there are no land disputes with Olam.</p>	
4.4.2	<p>Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:</p>	<p>Review of land documents shows Land for Olam plantations are state land with no land contributions from the six communities. This was further confirmed during stakeholder consultations with the Boungounga and Rembo communities.</p> <p>However, there are evidence of communication with the communities on FPIC process prior to signing the agreement with them. Reviewed a social contract signed on the 25/07/2014. The social contract details the agreements signed with each of the 6 communities in Lot 2 following the FPIC process.</p>	Complied
4.4.2a	<p>Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.</p> <p>- Minor compliance -</p>	<p>The company has negotiated agreement with all communities in the operational area. Based on the agreement the company has developed an action plan towards the implementation of the project activities. The document captioned Chronogramme de Realisation des Projets Sociaux des Villages du Lot 2 is dated 05/09/2022. A review of the action plan shows the document has been signed by all the representatives of the communities. The effectiveness of the communication about the action plan to the communities and to a local NGO (Brain Forest) can be further improved as most of the community representatives are illiterates.</p>	Complied

4.4.2b	<p>Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken.</p> <p>- Minor compliance -</p>	<p>Land for Olam industrial plantations was a result of agreement between the state and the company. There was no land contribution from any of the communities in Lot 1 and Lot 2. However, all the communities were taking through the FPIC process and gave their consent to the project. This was confirmed through review of signed agreements with the company and also during stakeholder interview with the Rembo and Boungounga communities.</p>	Complied
4.4.2c	<p>Evidence that the legal, economic, environmental and social implications of 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 unit of certification's title, concession or lease on the land.</p> <p>- Minor compliance -</p>	<p>Land for Olam industrial plantations was a result of agreement between the state and the company. There was no land contribution from any of the communities in Lot 1 and Lot 2.</p> <p>Interview with community representatives during the audit period indicates they were involved in all environmental and social assessment that were conducted prior to the implementation of the project. The outcome were fully explained to their understanding and they gave their consent to the plantation establishment by Olam.</p>	Complied
4.4.3	<p>(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p> <p>- Critical (Major) compliance -</p>	<p>The company has maps showing their legal rights to the use of the land for industrial plantations. The map captioned Mouila Lot 2 Oil Palm Plantation covers a total of 31,800 Ha. The additional map captioned Mouila Lot 1 Oil Palm Plantation covers a total of 35,355 Ha. Interview with the community representatives in Boungounga and Rembo confirmed their participation in the mapping.</p>	Complied
4.4.4	<p>All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.</p> <p>- Minor compliance -</p>	<p>All information of the company is written in French which is the official spoken and written language in Gabon. Although there are local languages in the communities, the company uses French in explaining all their information to the communities because its commonly spoken among the natives.</p>	Complied
4.4.5	<p>(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p> <p>- Critical (Major) compliance -</p>	<p>Communities during the consultations all indicated that they are represented by their traditional leaders who speaks and takes decisions on the communities' behalf. The leaders in consultations with the communities can also appoint some people such as women representatives and youth leaders</p>	Complied

		to represent the communities on some specific issues. The companies also maintain a list of all such leaders with their contacts in their stakeholder list.	
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	The company update its action plan for the implementation of the negotiated agreements. Reviewed the updated Chronogramme de Realisation des Projets Sociaux des Villages du Lot 2 dated 05/09/2022. These reviews were done in consultations with the representatives of all the communities represented by their elders. The audit team reviewed signed copies of the revised action plan.	Complied
Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	Not Applicable (N/A) The company has not acquired new land for plantings as of the time of this audit.	Not Applicable
4.5.2	(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation. - Critical (Major) compliance -	Not Applicable (N/A) The company has not acquired new land for plantings as of the time of this audit.	Not Applicable
4.5.3	Evidence is 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 unit of certification is signed and ratified by these local peoples.	Not Applicable (N/A) The company has not acquired new land for plantings as of the time of this audit.	Not Applicable

	<p>Agreements have to be negotiated and entered into voluntarily prior to new operations and without coercion.</p> <p>- Minor compliance -</p>		
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p> <p>- Minor compliance -</p>	<p>Not Applicable (N/A)</p> <p>The company has not acquired new land for plantings as of the time of this audit.</p>	Not Applicable
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p>	<p>Not Applicable (N/A)</p> <p>The company has not acquired new land for plantings as of the time of this audit.</p>	Not Applicable
4.5.6	<p>Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.</p> <p>PROCEDURAL NOTE:</p> <p>In Gabon, it is the State which grants the concessions. The operator will then identify the areas of activity with the populations and obtain consent for the implementation of the project.</p> <p>- Minor compliance -</p>	<p>Not Applicable (N/A)</p> <p>The company has not acquired new land for plantings as of the time of this audit.</p>	Not Applicable
4.5.7	<p>New lands will not be acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations in the national interest without consent (eminent</p>	<p>Not Applicable (N/A)</p> <p>The company has not acquired new land for plantings as of the time of this audit.</p>	Not Applicable

	<p>domain), except in cases of smallholders benefitting from agrarian reform or anti-drug programmes.</p> <p>PROCEDURAL NOTE:</p> <p>In Gabon, it is the State which grants the concessions. The operator will then identify the areas of activity with the populations and obtain consent for the implementation of the project. The promoter identifies the populations living near his concession, informs them and decides, with them, of the co-management elements in the common areas.</p> <p>- Minor compliance -</p>		
4.5.8	<p>(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.</p> <p>- Critical (Major) compliance -</p>	<p>Not Applicable (N/A)</p> <p>The company has not acquired new land for plantings as of the time of this audit.</p>	Not Applicable
<p>Criterion 4.6: 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.</p>			
4.6.1	<p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p> <p>- Critical (Major) compliance -</p>	<p>The company has a documented procedure that guides in identifying people entitled to crop compensation. The procedure dated 20/06/2014 has been approved by the Director of plantations.</p>	Complied
4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>The price per tree for each agricultural crop is determined by the Agricultural Department of Gabon. Based on the price guidelines provided by the government agency, the company pays each of the farmers entitled to crop compensation. Sample evidence of crop compensation payment made to the farmers were made available for review.</p> <p>Interview with the Boungounga and Rembo communities during the audit confirmed crop compensation payment to all farmers who lost their crops during Olam’s industrial plantation establishment.</p>	Complied

4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for small holdings.</p> <p>PROCEDURAL NOTE: In Gabon, land belongs to the State. For this reason, operators have no influence on the allocation of land titles.</p> <p>- Minor compliance -</p>	<p>Not applicable as the company does not have smallholder operations in their operations</p>	<p>Not Applicable</p>
4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.</p> <p>- Minor compliance -</p>	<p>Reviewed evidence of payment made to all the people entitled to compensation. Copies of the payment receipts have also been shared with the aggrieved people. During the audit interview, the community representatives confirmed payments were made as compensation for crop losses.</p>	<p>Complied</p>
<p>Criterion 4.7: 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 FPIC and negotiated agreements.</p>			
4.7.1	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	<p>Land for Olam operations are the result of negotiations with the state. The community did not contribute land to Olam’s operations. Nonetheless, should there be any land acquisition that is subject to compensation on loss of customary or user right, the compensation procedure following the Decree No 1016/PR/MAEPDR will be adhered to. The compensation procedure was established from discussion and validation by the Project Steering Committee on 02/08/2012.</p>	<p>Complied</p>
4.7.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.</p> <p>- Critical (Major) compliance -</p>	<p>Land for Olam operations are the result of negotiations with the state. The community did not contribute land to Olam’s operations.</p>	<p>Complied</p>
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.</p>	<p>Land for Olam operations are the result of negotiations with the state. The community did not contribute land to Olam’s operations.</p>	<p>Complied</p>

	- Minor compliance -		
Criterion 4.8: 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.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -	Review of land documents and interview with the communities did not identify land disputes in any of Olam’s operations.	Complied
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	Review of land documents and interview with the communities did not identify land disputes in any of Olam’s operations.	Complied
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4). - Minor compliance -	Review of land documents and interview with the communities did not identify land disputes in any of Olam’s operations.	Complied
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).	Review of land documents and interview with the communities did not identify land disputes in any of Olam’s operations.	Complied

	- Minor compliance -		
Principle 5: Support smallholder inclusion			
Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	Olam Palm Gabon (OPG) does not source FFB from any smallholders or outgrowers. All FFB processed originates from OPG own estates.	Not Applicable
5.1.2	(C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders. - Critical (Major) compliance -	Olam Palm Gabon (OPG) does not source FFB from any smallholders or outgrowers. All FFB processed originates from OPG own estates.	Not Applicable
5.1.3	(C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented - Critical (Major) compliance -	Olam Palm Gabon (OPG) does not source FFB from any smallholders or outgrowers. All FFB processed originates from OPG own estates.	Not Applicable
5.1.4	(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and/or other support mechanisms where applicable. - Critical (Major) compliance -	Olam Palm Gabon (OPG) does not source FFB from any smallholders or outgrowers. All FFB processed originates from OPG own estates.	Not Applicable
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	Olam Palm Gabon (OPG) does not source FFB from any smallholders or outgrowers. All FFB processed originates from OPG own estates.	Not Applicable
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. - Critical (Major) compliance -	Olam Palm Gabon (OPG) does not source FFB from any smallholders or outgrowers. All FFB processed originates from OPG own estates.	Not Applicable

5.1.7	Weighing equipment is verified by an independent third party on a regular basis (this can be government). - Minor compliance -	Olam Palm Gabon (OPG) does not source FFB from any smallholders or outgrowers. All FFB processed originates from OPG own estates.	Not Applicable
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -	Olam Palm Gabon (OPG) does not source FFB from any smallholders or outgrowers. All FFB processed originates from OPG own estates.	Not Applicable
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	Olam Palm Gabon (OPG) does not source FFB from any smallholders or outgrowers. All FFB processed originates from OPG own estates.	Not Applicable
Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	Olam Palm Gabon (OPG) does not source FFB from any smallholders or outgrowers. All FFB processed originates from OPG own estates.	Not Applicable
5.2.2	The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder). PROCEDURAL NOTE:	Olam Palm Gabon (OPG) does not source FFB from any smallholders or outgrowers. All FFB processed originates from OPG own estates.	Not Applicable

	The RSPO just developed a separate standard for Independent Smallholders and the Gabon NIWG decided to make it applicable for all Independent Smallholders in Gabon (see Annex 6). - Minor compliance -		
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	Olam Palm Gabon (OPG) does not source FFB from any smallholders or outgrowers. All FFB processed originates from OPG own estates.	Not Applicable
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	Olam Palm Gabon (OPG) does not source FFB from any smallholders or outgrowers. All FFB processed originates from OPG own estates.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme. - Minor compliance -	Olam Palm Gabon (OPG) does not source FFB from any smallholders or outgrowers. All FFB processed originates from OPG own estates.	Not Applicable
Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			
6.1.1	(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or the age legally authorized at the national level. - Critical (Major) compliance -	The company has a documented fair employment policy dated September 2018. The policy states that the company is committed to providing a workplace where rights of all employees are respected. The goal is to treat all employees with dignity and fairness and to take a proactive approach to protecting the rights of people in all our workplaces.	Complied
6.1.2	(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers' non-payment of recruitment fees.	Interview with 12 migrant workers (harvesters) in Estate 08, representatives in the Boungounga and Rembo communities did not identify issues of discrimination by the company. The migrant workers further stated they did not have to pay recruitment fees prior to their employment. Review of the company's recruitment procedure and interview with the migrant workers	Complied

	<p>- Critical (Major) compliance -</p>	<p>confirms the absence of discrimination in the company's operational activities.</p>	
<p>6.1.3</p>	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>The company has documented procedures for that guides the recruitment of expatriates, communities and Gabonese. The procedure for the communities is a result of an agreement with the company to give priority to the communities whenever there are the need for workers. Interview with the Human Resource manager confirmed the categorization of expatriate as non-citizens of Gabon The procedures are</p> <ol style="list-style-type: none"> 1. Procedure Interne de Recruitment de Travailleurs Entrangers, referenced 001/03/2016/RH/GT dated May 2016 2. Procedure d'embauche Prioritaire referenced MLA1-PRO 5-CRSS dated June 2015 3. Procedure de Recrutement des Employes Nationaux referenced 2708/2016RH/JM dated 27/08/2016 <p>A review of the procedure for expatriate workers shows the following</p> <ol style="list-style-type: none"> i. Job Advertisement of the position j. Acceptance of Job offered k. Provision of the all necessary document by the candidate l. Submitting such documents to the company m. Arrival of candidate in Gabon and meeting with the company HR manager and medical test n. Acceptance and signing of the contract o. Issued with a foreign worker's card p. Issuance of a Visa card <p>The procedure for recruitment of a Gabonese is as follows</p> <ol style="list-style-type: none"> 9. Job Advertisement 	<p>Complied</p>

		<ul style="list-style-type: none"> 10. Selection of CVs 11. Interview by Head of Department/Ds 12. Selection of qualified applicant 13. Approval of budget 14. Job Appointment 15. Medical test 16. Complete a personal form <p>Interview with the HR manager indicates the company has not undertaken any recruitment of citizens this year. However, there has been recruitment of expatriate this year. Twelve of the expatriates were interviewed during a visit to Estate 08 and information provided during the interview confirms the company followed their own procedures in the recruitment process.</p>	
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p>The company in general conducts medical test on all their workers during recruitment and it involves pregnancy test. Interview with the Assistant Human resource manager at Lot 1 indicates the purpose of the test is not to discriminate but to ensure those identified as being pregnant they receive the needed attention and care while working in the company. Pregnant women under the Gabonese laws are protected and as such they provide them with training that enabled them to know and access their rights.</p>	Complied
6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>The company has a gender committee in place for the Lot 1 and Lot 2 estates made up of 8 committee members. The committee hold periodic meetings and have a documented annual programme. The programme captioned Calendrier des activités annuelles du comité genre Lot 2 2022 has a number for activities to be implemented each month. Some of the activities for the year includes</p> <ul style="list-style-type: none"> a. Explanation on the reason for the establishment of the Gender Committee 	Complied

		<ul style="list-style-type: none"> b. Training for gender committee members c. National Women day celebration d. Official Launching of the gender committee <p>Some records on their meetings were reviewed</p> <ul style="list-style-type: none"> 1. Compte rendu de la reunion des membres du Comite Genre Date: 17th November 2022 Attendance: 6 committee members 	
6.1.6	<p>There is evidence of equal pay for the same work scope and provision of similar necessary working tools.</p> <p>PROCEDURAL NOTE:</p> <p>The verification is based on the sectoral collective agreement or, failing that, a company-wide agreement, or any other document recognized by the administration which clearly stipulates the applicable salary bases.</p> <p>- Minor compliance -</p>	<p>The company has a documented list captioned Classification Professionnelle des Emplois Palm dated 08/02/2017. The list has information on all the job categories present in the company. In addition, the company has a salary grade captioned Grille Salariale-Personnel d'execution dated 08/02/2017. The document has information on all the job categories and their corresponding salaries. The Jobs has been grouped into grades such as OE1, OE2, OE3 and others. This document guides the payment of the workers to ensure workers in the same categories and doing same work receive same pay.</p> <p>During the audit interview with the workers' representatives and sampled workers in the estates there were no complains of workers receiving different salaries for the same work done. Also, a review of sampled workers with registration numbers 039298, 024036, 051563 and 023501 all under category OE1AA were receiving the same pay rate of 675 CFA per hour.</p>	Complied
<p>Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			
6.2.1	<p>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay (Salary grid published, same salary for the same position) and conditions are available to the workers in national languages and explained to them in a language they understand.</p> <p>PROCEDURAL NOTE:</p>	<p>The company has a documented collective agreement with their worker's representatives captioned Accord D'Establissement dated 08/02/2017. The document has information on the salary structure and the workers condition of service. The document is written in the French language and copies has been shared with all the worker's representatives. The document is available to all Olam workers upon request.</p>	Complied

	<p>The verification is based on the sectoral collective agreement or, failing that, a company-wide agreement, or any other document recognized by the administration which clearly stipulates the applicable salary bases.</p> <p>- Critical (Major) compliance -</p>	<p>The content of the document is communicated to all workers during their induction period. Interview with the workers representatives confirmed the document has been shared with them.</p>	
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed, including work done by family members.</p> <p>- Critical (Major) compliance -</p>	<p>All Olam workers are issued contract document during job appointments and the document has information on their pay and working conditions including working hours for the year, maternity leave, contract duration, holidays and annual leaves, and reason for dismissal.</p> <p>Also, at the end of each month prior to salary payment, each worker is issued a payslip. The payslip details the salary, deductions, overtime, absent hours, bonus, social security, housing rent and others.</p> <p>However, a review of the contract documents for sampled workers (034638, 054075) identified discrepancies in the salary grade and actual salary paid to workers. During interview with the workers’ representatives, they confirmed ongoing discussions between the representatives and management to align the grade with the salary. The audit team also reviewed action plan toward addressing the errors and minutes of meetings with the workers’ representatives on progress made on the implementation of the agreed action plan.</p> <p>However, on-going discussion between management and workers’ representatives on aligning the grades with salaries paid can be further improved by informing the representatives on every progress made by management.</p>	OFI
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>In the agricultural sector, the Gabon labour law indicates the total working hours for the year is 2400 hours per worker. Also, a review of the workers’ condition of service under Article 10 states that the legal annual working hours for each worker is 2400 hours. This translates into a daily working hour from Monday to Friday of 8 hours and 6 hours on the Saturday making 46 hours per week. Any additional hours made is paid as overtime. Reviewed</p>	Complied

		sampled pay slips for workers with registration numbers 039298, 051563 and 024036 all showed the payment of overtime for work done.	
6.2.4	<p>(C) The unit of certification provides adequate housing, sanitation facilities, drinking water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>The company provides housing to most of their workers both permanent and contract workers. The working families are giving a house each which is made up of a two-bedroom apartment with toilet, kitchen and a bathhouse. However, for non-family workers, two workers are giving a house to share. Thus, a worker per room buy two workers shares same toilet, kitchen and bath. For Olam workers who are not provided with accommodation, the company provides housing allowance to cater for their accommodation needs.</p> <p>For contractor's workers, the company has an agreement with the contractors to provide dormitories for their contractor workers. Interview with the HR manager indicates there are 4 workers per room. Field visit also confirmed the housing of 4 workers per room. The number per room meets the requirements of the country's housing policy.</p>	Complied
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	The company has created an avenue for the establishment of a shop where workers can access some of their needs. Also every Wednesday after work, Saturday and Sunday, the company provides buses for workers to towns where workers can access all their food stuffs.	Complied
6.2.6	<p>A DLW is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE: STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE (Endorsed by the RSPO BoG on 7th November 2019) With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing</p>	The company has conducted as assessment of the prevailing wage it currently pays the workers. The assessment was conducted in September 2022, covers workers accommodated onsite and offsite and the calculation is based on the national minimum wage. The assessment considered some in-kind benefits such as housing allowance, transportation, education and health care. The current minimum wage paid by the company to staff 303,689 CFA whiles the countries minimum wage is 150,000 CFA.	Complied

<p>countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist¹</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO- endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks². These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers’ union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage³.</i></p> <p>The Gabon NIWG will, on their side, start identifying the existent national statistics necessary for the calculations as stipulated in the new RSPO-endorsed living wage methodology.</p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> • Updated assessment on prevailing wages and in-kind benefits • There is annual progress on the implementation of living wages • Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment • The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p>		
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6.2.7	<p>Permanent, full-time employment including contractors' workers and contracted workers is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p>	<p>There are two categories of workers under the direct control of the company. They are the permanent workers and the temporal workers. There are contractor workers who are under the direct control of Contractors who provide maintenance services in the estates to the company. All Olam workers in the plantations is permanent workers. There are no temporal workers in the plantations.</p>	Complied
<p>Criterion 6.3: The unit of Certification 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.</p>			
6.3.1	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand, and is demonstrably implemented. The official language is the language which is recognized as such in the constitution and / or the laws of the country concerned. It is the language used in government and public services.</p> <p>- Critical (Major) compliance -</p>	<p>Interview with the Human Resource manager indicates the Gabon labour code states in Article 303 that each and every worker has the freedom to join any group or association of their choice. Also, the company has a published Freedom of Association statement captured in the Human Rights policy dated 1st September 2019. The statement indicates</p> <ol style="list-style-type: none"> 1. Workers shall have the right to join, or to refrain from joining, representative associations of their choice and to bargain collectively 2. A worker's choice to form or join an association will not compromise their equal treatment at work. <p>Interview with the workers representatives during the audit period confirmed the statement has been communicated to all the workers.</p>	Complied
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages and made available upon request.</p> <p>- Minor compliance -</p>	<p>The company holds meetings with the worker representative's ones every month and this was confirmed by the workers' representatives during the audit interviews. For all such meeting, the company keeps records of the minutes of meetings. Copies of the minutes of meetings with attendance were made available for review. They are</p> <ol style="list-style-type: none"> 1. Minutes of Meeting with the Workers Representatives Date: 5th November 2022 Attendance: 24 staffs 	Complied

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		<p>2. Minutes of Meeting with the Workers Representatives Date: 5th October 2022 Attendance: 24 staffs For all such meetings, copies of the records are shared with the workers' representatives.</p>	
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers. - Minor compliance -</p>	<p>Interview with the workers' representatives during the audit period indicates management does not interfere in the operations of the union.</p>	Complied
Criterion 6.4: Children are not employed or exploited.			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements. - Minor compliance -</p>	<p>Olam has a published statement on Child labour which is applicable to all their subcontractors. The document describes child labour as work that is</p> <ol style="list-style-type: none"> 1. mentally, physically, socially or morally dangerous and harmful to children 2. and interferes with their schooling by 3. depriving them of the opportunity to attend school; 4. obliging them to leave school prematurely or 5. requiring them to attempt to combine school attendance with excessively long and heavy work. <p>The document states that the company does not employ workers that are below the age of 18 years in their operations. In the agreements signed with their contractors, it requires the contractor to comply with the provisions of the labour code.</p>	Complied
6.4.2	<p>(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national</p>	<p>The company during recruitments uses a number of mechanisms to verify the age of their workers including for subcontractor workers. They include</p>	Complied

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	<p>minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure that is to say, provision of a national identity document for the national worker officially recognized at national level and a residence permit (CDS - Carte de séjour in French) for the foreign worker which is the subject of documentation.</p> <p>- Critical (Major) compliance -</p>	<p>verification of their birth certificates, national identity cards and the picture of the worker. During field visits, there was no observation made of a worker under the age of 18 years in the plantations. Also a review of the file of new workers did not identify any below the age of 18 years.</p> <p>The company has a documented procedure for age verification for recruitment of Expatriates and citizen.</p>	
6.4.3	<p>(C) Young workers (between 16 and 18 years old) are not employed in RSPO certified companies in Gabon. The minimum age is 18 years old.</p> <p>- Critical (Major) compliance -</p>	<p>Review of sampled workers files, observation during estate visits and interview with workers confirms the company does not employ worker below the age of 18 years in their operations.</p>	Complied
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>Interview with Rembo and Boungounga communities and sampled workers in Lot 2 all confirmed the no child labour policy has been communicated to their understanding. They also demonstrated knowledge of the policy during the audit interview.</p> <p>The company does not have FFB suppliers in their operations.</p>	Complied
Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	<p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>The company has a documented sexual harassment policy dated September 2018. The document reviewed states the actions and behaviours that qualifies as sexual harassment. The document also provides guidelines on what one must do when sexually abused. Interview with sampled workers in the Lot 1 and 2 all confirmed the policy has been explained to their understanding and demonstrated knowledge of the policy. During interview with the Gender Committee, they indicated they received a reported case of sexual harassment which was investigated and concluded upon.</p>	Complied

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6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>OPG-Bilala POM has a documented Reproductive policy which is captured in the company’s Human Rights policy dated 1st September 2022. The policy states that reproductive rights are protected with full implementation of all relevant articles of Gabon labour code (Article 170 to 175).</p> <p>The policy has been displayed on the company’s notice boards. Interview with sampled workers in the estate and gender committee all confirmed the policy has been communicated to them and they demonstrated knowledge of the policy.</p>	Complied
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p>	<p>Management through the gender committee engages with the new mothers to assess their need and develop action plan that aims to address the identified needs. Records of the meeting with the new mothers was made available for review</p> <ol style="list-style-type: none"> 1. Minute of meeting with Expectant or New mothers Date: 8th October 2022 Attendance: 6 staffs. 	Complied
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>The company has a documented procedure for handling grievance captioned Procedure de Gestion des Plaintes est Reclamations referenced SOP N°07/SD-GP (9)/0622 and dated 16/06/2022. The documented procedure outlines the process for addressing internal grievances, external grievance (communities) and grievances from the mill. For each category of grievance, the procedure make provision for a timeline for resolving the complaints submitted. The procedure also states that the complainant can request for anonymity when filing a complaint.</p>	Complied
Criterion 6.6: No forms of forced or trafficked labour are used.			
6.6.1	<p>(C) All work is voluntary and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports • Payment of recruitment fees Contract substitution Involuntary overtime. 	<p>Interview with migrate workers in Lot 1 and Lot 2 (work shop) did not indicate force labour in the operations of Olam-Bilala. The workers interviewed all their travel documents in their possession and have the freedom to resign as and when they want to.</p>	Complied

	<ul style="list-style-type: none"> Lack of freedom of workers to resign Penalty for termination of employment Debt bondage Withholding of wages <p>- Critical (Major) compliance -</p>		
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	Field visit to Lot 1 and Lot 2 shows the presence of temporal and migrant workers in Olam operations. And the company has a documented specific labour policy and procedures in place for the migrant workers. The document captioned Foreign Workers recruitment policy referenced SOP N°12/SD-FWR (01)/0820 and dated 3 rd August 2020. The temporal workers are cover by the existing labour policy that covers all workers of Gabon and are represented by the workers union.	Complied
<p>Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>The estates and mill management have conducted the regulated quarterly safety committee meeting with the participation of workers representative. Occasionally, some of the meetings were delayed due to movement restriction of Covid-19. All minutes of meetings were made available for verification. Generally, among the agenda discussed in the meetings are:</p> <ul style="list-style-type: none"> Confirmation of minutes previous meeting Workplace inspection report Accident report General Safety Other matters 	Complied
6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in the appropriate language of the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is</p>	<p>The procedures for accident and emergencies (Rspnse d'urgnce enc as d'accident, rev 2, dated 09/09/2022) have been established. There is formation of ERP Team & ERP for all the identified incidences. In addition, the procedures have been summarized in a chart flow form and displayed for information of all employees in the estates/mill. They include emergencies relating fire, chemical spillage, and accident at workplace.</p>	Complied

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	<p>available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>ERT members have been provided with training on emergency procedures appropriate to their respective workplace and level of risk. The trainings were conducted internally by the competent person.</p> <p>The trained personnel for the First Aid were among the employees working as field staff. The first aid boxes were available at various points in the estate office, workshop, and store. The first aid kits were provided to the field staff and brought along to the field during operations.</p>	
<p>6.7.3</p>	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>The management provides appropriate PPE to the employees in accordance with the risk assessment and PPE Matrix. PPE issuance records were well maintained and made available for verification. Among the information available in the record was name of employee, type of PPE (i.e., coverall suit, safety shoes, rubber boots, respirator, cartridge, helmet, goggles, cotton gloves, leather gloves, etc.), date of PPE received and receipt acknowledgement by the recipient. However, some workers were found not using the appropriate personal protective equipment (PPE) at the place of work as the following observations:</p> <ol style="list-style-type: none"> 1) Three workers at the mill’s FFB ramp have not been provided with ear plug as required in the company’s PPE matrix. 2) At the FFB ramp of Estate 8, the worker who was assigned to put on the net to cover the FFB in the truck’s bin was using the safety harness since he was working at height. However, the rope (lifeline) attached to his harness was too long, in which if he fell from the top of the bin, he will still hit the ground. 3) One of the FFB loaders at Estate 9 was found not wearing safety shoes as required in the PPE matrix while loading the FFB into a tractor at Field no. J08. 4) Two contract harvesters were found not wearing safety shoes as required in the PPE matrix while harvesting at Field no. Q18, Estate 6. <p>Thus, a non-conformity report was assigned due to this lapse.</p>	<p style="text-align: center;">Non-compliance</p>

		Sanitation facilities such as shower room, PPE washing area, personal clothing locker for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing were provided and well maintained.	
6.7.4	All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with national law or by the unit of certification where national law does not offer protection. - Minor compliance -	Should there be any medical care needed by the employees, clinic with doctor in-charge is provided which is in Estate 4. Based on site visits, the clinic was well maintained and managed. Records of treatment, and medical itinerary were well updated. OPG is subscribing to the CNSS to cover the accident insurance for all their employees, including workers. The contribution is made quarterly, and the latest payment was made on 28/10/2022 as verified through the receipt #22Q0000116452.	Complied
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA). - Minor compliance -	The RSPO's Lost Time Injury Frequency Rate (LTIFR) metrics was used to record the number of lost time injuries and total hours worked for the period of Jan – Dec of 2021. Verification against the certification unit's other records such as accident reports and summary found the data to be accurate.	Complied
Principle 7: Protect, conserve and enhance ecosystems and the environment			
Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.			
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -	OPG has developed Olam Palm Gabon – Agricultural Policy Manual, Volume 2, of 2013. Chapter 15: Integrated Practices to Manage Insects, Animals and Diseases. The plan involves the use of beneficial plants such as <i>cassia cobanensis</i> and <i>antigonon leptopus</i> ; cover crops such as <i>nephrolepis</i> sp., and <i>Ageratum conizoides</i> . OPG has specifically identified Elephants as the major pests and developed a specific strategy to manage elephants as evidenced in (Olam palm Gabon – Elephant Control, Reviewed Strategy and Structure to Efficiently Address Crop Destruction, Version 4, November 2018). Major aspects of the strategy include: <ul style="list-style-type: none"> • Digging and maintenance of trenches 	Complied

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		<ul style="list-style-type: none"> Erection of fences Use of barbed wire <p>“Elephant Trench Monitoring Map – Mouila Lot 1” and “Elephant Trench Monitoring Map – Mouila Lot 2” were seen during the audit.</p> <p>Weekly maps are produced to document newly dug trenches, i.e. trenches done this week, trenches repaired in the week, trenches done till date and trenches not yet done. In Lot 1 so far 256.954 Km of trenches have been dug. Meanwhile 185.798 Km are still to be done.</p>	
7.1.2	Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented. - Minor compliance -	No species reference in the Global Invasive Species Database and CABI.org are used by OPG.	Complied
7.1.3	There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities. [see guidance section for NI additional guidance for this process]. - Minor compliance -	OPG has a zero-fire use policy as documented in OPG Agricultural Policy Manual of 2013. Field observations did not reveal any use of fire in pest control or any other operations.	Complied
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised. - Critical (Major) compliance -	OPG has developed Agriculture Policy Manuals Volume 1 and Volume 2 (dated April 2013). Justification of pesticide use specifically to the targeted pest, weed or disease is spelt out in Chapter 9 of the Manual, titled Immature Maintenance and Ablation. Additionally, OPG keeps a record of pesticides and their specific uses as evident in Document Number: PRP-EN02, Issue No. 1; of 05/10/2017.	Complied

		Apart from that, Chapter 15 of OPG agriculture manual covers the Integrated Pest & Disease Management Practices, where treatment and management of insects and leaf-eating pests are addressed.	
7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	Records of pesticides used were addressed in a master sheet titled (Health and Safety Form: Pesticides Active Ingredients Analysis per Ha, Document Number: PRP-EN02, Issue No. 1; of 05/10/2017). The format has the information about records of pesticides use (including active ingredients used and their LD50, area treated, and amount of active ingredient. All the sampled estates have made the records available for verification. Based on records such as store bin card, and store inventory records in SAP system, among the major pesticides used by the estates were glyphosate, metsulfuron methyl, and triclopyr butotyl.	Complied
7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>The quantity of agrochemicals required for various field conditions is documented and justified in Chapter 15 of OPG Agriculture Policy Manual covers Integrated Pest & Disease Management Practices. The manual provides the guideline on type of agrochemical use, target pest/weed/disease, weed situation, recommended chemical, application rate, and method of application.</p> <p>The implementation in the field was found to be consistent with the SOP established.</p>	Complied
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	There was no evidence of prophylactic use of pesticide at all the sampled estates.	Complied
7.2.5	<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, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p>	Through verification of store issuance records, field and chemical stores visit, there was no evidence that pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, were used at all the sampled estates.	Complied

	<p>a) Judgment of the threat and verify why this is a major threat</p> <p>b) Why there is no other alternative which can be used</p> <p>c) Which process was applied to verify why there is no other less hazardous alternative</p> <p>d) What is the process to limit the negative impacts of the application</p> <p>e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p> <p>- Minor compliance -</p>		
7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>Trainings on safe handling of chemical and right method of spraying were given to the relevant employees which include the storekeeper, pre-mixers, and herbicides sprayers. Various methods of training such as briefing, practical training and on-the-job supervisions were used to ensure effective delivery of knowledge. Records of training were well maintained by the sampled estates for verification.</p>	Complied
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticides were found stored in all estate’s Chemical Store in accordance with the OPG’s Procedure for Storage and Handling of Agrochemical Products (Document Ref OPG-MLA-EHS-SOP-05, dated 01/10/2017, rev. 2). The stores were at all times locked to prevent unauthorised entrance. The hazard signage was observed to be adequately displayed on the exterior and interior walls. Ventilation facilities and safety data sheets were also adequately provided.</p>	Complied
7.2.8	<p>All pesticide containers are properly disposed of and/or handled responsibly if used for storing or for the same purposes.</p> <p>- Minor compliance -</p>	<p>Excess empty chemical containers that were not used for containing pre-mixed chemicals are triple rinsed and punctured and kept at a designated stores in accordance with the Procedure of storage and handling of agrochemical products [OPG-MLA-EHS-SOP-05, dated 01/10/2017, rev. 2].</p>	Complied

7.2.9	(C) Aerial spraying of pesticides is prohibited. - Critical (Major) compliance -	Aerial spraying of pesticides is not practiced by all the sampled estates.	Complied
7.2.10	(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. - Critical (Major) compliance -	The existing spraying operators will have to undergo an annual medical surveillance which is regulated under Gabonese Labour Code. The surveillances were conducted by doctors employed by the company and records are kept at the estate's clinic. Verification of records showed that the medical surveillances were effectively conducted. Operators which were found to be unfit will be assigned to other jobs which are not related to any pesticides.	Complied
7.2.11	(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work. - Critical (Major) compliance -	Based on site observation and verification of employee master list and interviews at the sampled estates, there was no evidence that work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions.	Complied
Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			
7.3.1	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented. - Minor compliance -	OPG has developed Waste Management Procedure for different waste types. For household waste the procedure titled: Gestion des Dechets: Procedure Standard d'Exploitation, Doc. No. OPG-MLA-EHS-SOP-12, 3rd Edition, produced on 01.10/2013 and revised on 01/08/2022. For proper implementation of the procedure, a waste collection sheet has been developed titled: Waste-S1-M1-Specific Document on Waste Collection. According to the plan, household waste is collected from housing areas 3 times a week, Mondays, Wednesdays and Fridays between 7 am and 2pm. Waste collected from housing units is sorted at the dumpsite. Metal waste and plastic waste are collected and stored for onward recycling. Biomedical wastes from clinics are stored in secured designated areas for onward elimination by authorised third parties.	Non-compliance

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		<p>For chemical waste, including empty pesticide containers, the procedure titled: Mise en rebut des Contenants des Produits Agro-chimiques. Doc. No. OPG-MLA-EHS-SOP-15 established on 05/09/2015 and revised on 09/09/2022, first revision.</p> <p>OPG has signed agreements with different partners to collect different types of waste such as plastics, scrap metals, biomedical waste, spent oils and spent batteries.</p> <p>For instance, HSE Gabon collected 1129.4Kg of biomedical waste on 16/09/2022, receipt no. 0000272 and receipt no. 0000076, collected on 14/10/2022.</p> <p>Certificate of destruction no. 0000558 via incineration on 18/10/2022.</p> <p>For the collection, transportation and treatment of waste, an authorisation from the government of Gabon is required.</p> <p>HSE Gabon's Authorisation No. 001673/MEFMEPCPAT/SG/DGEPN, of 13/11/2020, valid for 2 years expired on 13th November 2022.</p> <p>However, HSE Gabon collected waste from OPG Lot 2 in Mandji waste storage site on 24/11/2022 at 10.00 a.m.; corresponding to 3,004Kg of empty pesticide packaging (bags, containers); receipt number 00000051.</p> <p>A valid authorisation for the collection, transportation and treatment of waste by HSE Gabon was not available at the time of collection of the aforementioned quantities of waste from Lot 2 in Mandji. This does not respect the legal requirement for an authorisation. Thus, a non-conformity report was assigned.</p>	
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7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. - Minor compliance -	OPG organises meetings to sensitize workers on appropriate waste management techniques. Meetings records with attendance sheets were seen during the audit. e.g., on 08/10/2022 for JVG contract workers; 23/03/2022 for SDIS contract workers; and 21/11/2022 for Olam workers: on collection of empty pesticide containers.	Complied
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	OPG has a fire management plan with reference DS-PRP.02 of 28/03/2020), which prohibits the use of fire. Additionally, field observations did not reveal the use of fire for waste management.	Complied
Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agricultural practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -	Olam Palm Gabon Agriculture Policy Manual has been established to cover all the estates operations which includes nursery, land preparation, planting, replanting, infrastructure maintenance, fertilisers application, IPM, and best practices to name a few. There are 20 SOPs all aspects of oil palm management. The related SOP namely Leaf & Soil Sampling Procedure (chapter 19 of the manual) and Fertiliser Programme (chapter 7) were verified. All estates operate in accordance with the Agriculture Manual and standard operating procedures. The implementations were consistently monitored by estate operation management and various internal inspections. The recommendations for improvements are given to maintain the sustainable and best practices.	Complied
7.4.2	Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health. - Minor compliance -	Foliar and soil sampling was carried out by internal agronomist from Mandji Agronomy Team prior to the fertilizer recommendation for the next financial year. Leaf and soil nutrient analysis are commonly used in the diagnosis of fertilizer requirements in oil palms. The frequency for leaf sampling must be conducted every year while for soil analysis, the frequency is once in 4 years. Records of the leaf sampling and soil analysis were made available for verification at all the sampled estates.	Complied

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7.4.3	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>EFB, and POME were applied as per Chapter 7 of OPG Agriculture Policy Manual Volume 1, dated April 2013, on Fertilizing Programme for Nursery, Immature and Mature Plantings. Records of application were maintained by the estates and made available for verification. Among the information available in the records is field number, quantity of EFB being applied (mt) and date of application. Nonetheless, due to distance constraint, only the estates located nearby the mill were seen to be applying the EFB.</p>	Complied
7.4.4	<p>Records of fertiliser inputs are maintained.</p> <p>- Minor compliance -</p>	<p>Records of fertiliser input were well maintained in various documents such as store issuance record, bin cards and month end account to name a few. Among the information available in the records was type of fertiliser, quantity and field number applied including date of application. Based on sampled fields, the amount of fertilisers issued out (i.e. applied) from the store according to the estates' accounting software system was in-lined with the recommendations by agronomist, for all the sampled estates.</p>	Complied
<p>Criterion 7.5: Practices minimise and control erosion and degradation of soils.</p>			
7.5.1	<p>(C) Practices minimise and control erosion and degradation of soils.</p> <p>- Critical (Major) compliance -</p>	<p>Olam Palm Gabon has developed a manual of best practices as evidenced in its agricultural policy manual Vol 1. Of April 2013 that covers several aspects including practices to minimise and control erosion and degradation of soils. More specifically, Chapter4: Management of Water and Drainage System Chapter 6: Methods of Soil and Water Conservation Chapter 8: Establishment and Management of Cover crops.</p> <p>Additionally, OPG Lot 1 has conducted a soil survey titled: Soils of Mouila Lot 1 Plantation, Ngounie Province, Republic of Gabon, Africa, of September 2014. Conducted by Param Agricultural Soil Surveys (M) SDN. BHD, Co. No. 208039-H.</p>	Complied

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		Moreover, Soil fertility studies are conducted every 5 years. The report for 2020: Soil Fertility Study Report Lot 1, November 2020. Was seen during the audit. The reports include soil maps.	
7.5.2	There is no extensive replanting of oil palm on steep terrain. - Minor compliance -	According to the soil survey conducted by PARAM AGRICULTURAL SOIL SURVEYS (M) SDN. BHD (October 2018), and the resulting soil and topographic maps, the major soil type identified within the OPG concession is Haplic Nitisol (based on UNESCO soil map). No steep terrain are present within the concession. Additionally, OPG has developed an Agricultural Policy Manual Volume 1, of April 2013. Chapter 6: Soil and Water Conservation Methods clearly states that planting is not recommended for inland areas with slope exceeding 20-30 degrees.	Complied
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	Based on site visits and field maps verification, there was no new planting of oil palm on steep terrain observed.	Complied
Criterion 7.6: 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.			
7.6.1	(C) To demonstrate the long-term suitability of land for oil palm cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -	OPG has conducted a soil survey titled: Olam Palm Gabob S.A.; Soils of Mouila Lot 2 Estate; Ndolou Tsamba Magotsi Departments, Ngounie Province, Republic of Gabon, Africa, of October 2018. Conducted by: Param Agricultural Soil Surveys (M) SDN. BHD. Co. No. 208039-H. Aspects covered include topography and drainage, geology and geomorphology, and climate. The soil survey is conducted every 5 years. The study led to the production of soil maps.	Complied
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.	No marginal or fragile soils were identified in OPG soil survey.	Complied

	- Minor compliance -		
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	Chapter 3 of OPG Agricultural Policy Manual (on Estate Road and Drainage Construction Requirements), specifically deals with Road networks. Meanwhile, Chapter 4 (on Water management and Water Drainage System) deals with a system of drainage canals. Based on OPG soil survey, topographic information is used to guide all road maintenance activities as evidenced in Road Map Estate 1 – Mouila Lot 1 (GIS-Drone Department/Olam Lebamba; Syst. WGS_1084_UTM_Zone_32S, of 40/10/2021). OPG’s road maintenance program includes the distribution of gravel stones, grading and compacting and construction of gutters to prevent erosion, as evidenced in Road and Block map, Mouila Lot 1 Plantation, Olam Palm Gabon S.A. Ngounie Province. Gabon.	Complied
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	No peat soils were identified in the concession area.	Not Applicable
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below). - Minor compliance -	Same as 7.7.1 above.	Not Applicable
7.7.3	(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	Same as 7.7.1 above.	Not Applicable

7.7.4	<p>(C) A documented water and ground cover management programme is in place. - Critical (Major) compliance -</p>	Same as 7.7.1 above.	Not Applicable
7.7.5	<p>(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>PROCEDURAL NOTE: Full details of the RSPO Drainability Assessment Guidelines and related concepts and detailed actions are in the manual currently being fine-tuned/tested by PLWG. A final version should be approved by PLWG in January 2019 and will include additional guidance on the steps to be followed after the decision not to replant as well as implications for other stakeholders, smallholders, local communities and the unit of certification. It is recommended that a further twelve-month methodology trial period is proposed for all related management units (i.e. those with plantations on peat) to utilise the methodology and provide feedback to the PLWG to enable further refinement of procedure as appropriate before January 2020. Units of certification have the option to defer replanting till after the availability of the revised guidelines. Additional guidance on alternative crops and rehabilitation of natural vegetation will be provided by PLWG.</p>	Same as 7.7.1 above.	Not Applicable

	<p>PROCEDURAL NOTE: PLWG and the Smallholder Interim Group (SHIG) will collaboratively develop guidance for Independent Smallholders [cross links to SHIG and GHG issues]. - Critical (Major) compliance -</p>		
7.7.6	<p>(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance. - Critical (Major) compliance -</p>	Same as 7.7.1 above.	Not Applicable
7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2018) and associated audit guidance. - Critical (Major) compliance -</p>	Same as 7.7.1 above.	Not Applicable
<p>Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.</p>			
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following: a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities. b) Workers have adequate access to clean water.</p>	<p>OPG has developed a water management plan titled, Water Management Plan (OPG Mouila Lot 2), Document No. PLAN MLA/CRS_WMP/0219, of December 2019; and Sustainable Water Management Plan, Mouila Lot 1 Plantation, December 2019. Document No. PLAN MLA/CRS_WMP/0219, of December 2019. The management objectives of the water management plan include aspects such as: protection of human health, protection of water resources, pollution</p>	Complied

	<p>- Minor compliance -</p>	<p>of water resources (surface and ground water) by pesticides, and sustainable use of water.</p> <p>Annex A of the water management plan: Parameters and Frequency for drinking water testing. Specifies the parameters to be measured and at what frequency, e.g.</p> <p>Water testing is done twice a year, once in dry season and once in rainy season as established in water testing programme of OPG: Year 20222 (July-August, dry season) and in December (rainy season, i.e. includes pesticide tests), all tests are done by an external laboratory. Water sample collected On 24-28 August 2022. Analysis conducted by Pro-Training & Co Laboratory. 5 samples were collected from 5 rivers, and 4 samples from mill effluent. Dated 23/09/2022. Report No. 1-534-2022/AEOPG/ML1</p> <p>For drinking Water:</p> <p>Physicochemical and toxic substances (pH, turbidity, nitrates, nitrites, arsenic, etc.) i.e. quarterly.</p> <p>Microbiological: faecal coliforms, faecal streptococci, etc. i.e. monthly</p> <p>Pesticides, e.g. glyphosate, fluroxypr, deltamethrine, etc. i.e. annually.</p> <p>Annex B : Parameters and Frequency for Surface Water Testing Upstream and Downstream Samples.</p> <p>Physicochemical: 3 times a year in the first year and 2 times a year from second year</p> <p>Toxic Substances: twice a year from first year and annually from second year</p> <p>Pesticides : Annually</p>	
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		<p>OPG workers have adequate access clean water as evidenced by reports of analysis of drinking water seen during the audit.</p> <p>Samples of 26/08/2022: ref. Mo1-2-2022-8</p> <p>Samples of 26/09/2022: ref. Mo1-2-2022-9</p> <p>Samples of 25/10/2022: ref. Mo1-2-2022-10</p> <p>Testing is done by Olam Lebamba Agricultural Service, Agricultural Laboratory.</p>	
7.8.2	<p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).</p> <p>- Critical (Major) compliance -</p>	<p>The unit of certification has developed a water Management plan titled: Plan de Gestion des Eaux de la Plantation de Mouila Lot 1 – Olam Palm Gabon (Sustainable Water Management Plan – Mouila Lot 1 Plantation (Document Reference PLAN MLA/CRS_WMP/0219, Revision 01, of 14/12/2019). This plan sets out the activities aimed at monitoring the quality of surface waters including rivers, wetlands and buffer zone, best agricultural practices, etc.</p> <p>Reports of monitoring of wetlands and riparian zones are included in HCV monthly monitoring reports, such as (Rapport Mensuel SMART Mouila Lot 2: No8/2022, SMART ID: 0000008 for August 2022; No9/2022, SMART ID 0000009 for September 2022 and No10/2022, SMART ID 000010) and 000011 for September 2022).</p> <p>Additionally, other activities aimed at protecting riparian zones include the installation of signboards to show riparian zones, as sighted during field visits.</p> <p>OPG equally conducts testing of surrounding surface water. Reports of Surface water analysis were equally seen during the audit.</p> <p>Sample 22.1453.1 of 28/06/2022. Surface water analysis are conducted by SEEG Laboratoire Central Eau.</p>	Complied
7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p>	<p>Olam Palm Gabon, Mouila has developed a system to collect and treat all mill water that is produced.</p>	Complied

	- Minor compliance -	<p>The system includes Daily Log-sheets for effluent inlet at clarification station Logbook for final discharge to pond for land application</p> <p>Periodical testing of mill effluent is conducted by Cabinet d’Expertise et Conseil Pro-Training & Co SARL. The report of the analysis was seen during the audit. (Rapport d’Analyse Physicochimie Eaux Effluents No. 1-534-2022/AEOPG/ML1 of 27/09/2021.</p> <p>The report showed that results including BOD are within the legally established limits (set at 6500mg/l).</p>	
7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- Minor compliance -</p>	<p>Mill water use per tonne of FFB is monitored and recorded accordingly. Daily records of all water consumption are kept, and these are added up to produce monthly records.</p> <p>Total quantities of water used in the mill are recorded and calculated monthly. Additionally, mill water use per tonne of FFB is monitored and recorded. Data from January to October of 2022 were viewed during the audit.</p>	Complied
Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised			
7.9.1	<p>A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and reported.</p> <p>- Minor compliance -</p>	<p>A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy is incorporated in Olam Palm Gabon Continuous Improvement Plan Revision of 2019.</p> <p>Aspects of the plan include: monitoring of total fibre and shell used per MT of CPO; monitoring of direct fossil fuel used per MT of FFB or CPO; fuel allocation quota is determined to all vehicles based on travel distance. Meanwhile, a renewable energy i.e. methane capture facility planned for next year.</p> <p>During processing, fibre is used in boiler and turbine to produce electricity continuously to supply the housing and mill KCP. A biogas production plant</p>	Complied

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		<p>from the effluent is planned to take effect next year. Once this takes effect, OPG Mouila plans to discontinue use of diesel.</p> <p>Energy consumption for steam constitutes 95.59 percent of energy use in 2021.</p> <p>Energy consumption from genset is just 4.41percent of energy use from genset/diesel for the year 2021.</p> <p>Energy consumption is recorded in daily log sheets and compressed into monthly reports. The monthly reports were seen during the audit.</p>	
<p>Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</p>			
<p>7.10.1</p>	<p>(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>OPG has identified all its GHG sources and reports them publicly through Palm GHG. The 2021 Summary was seen at the time of the audit (Usine Olam Mouila Lot 1 Site Bilala Oil Mill – 2021 Summary). The summary includes, summary emissions, mill emission credits, estate/plantation field emissions and sinks (own, group and 3rd party).</p> <p>Reduction of GHG is presented in the Continuous Improvement Plan (April 2019), and actions taken to reduce GHG emissions include implementation of quotas for use of vehicle fuels, and regular control/maintenance of vehicle engines to ensure efficiency. Additionally, interviews with the Sustainability Manager revealed that OPG has plans to set up a methane capture (i.e. biogas plant). There equally is use of fibre and cork at the mill for sterilization.</p>	<p>Complied</p>
<p>7.10.2</p>	<p>(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	<p>Planting was done in 2013, hence this is not applicable.</p>	<p>Not Applicable</p>

7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>As mentioned in 7.10.1 above, OPG GHG calculation captures all significant pollutants. All significant pollutants, including POME, have been identified and plans to minimise them are implemented as part of OPG Continuous Improvement Plan.</p>	Complied
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area			
7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning.</p> <p>- Critical (Major) compliance -</p>	<p>Volume 1, Chapter 2, Section 2.5 of OPG Agriculture Policy Manual, clearly states that the use of fire for land preparation is strictly prohibited.</p> <p>Additionally, no new planting or replanting is ongoing within the concession area. Field interviews with local populations, workers and our own field observations did not reveal any use of fire by OPG.</p> <p>However, if a fire incident should occur, OPG has developed a Plantation Fire Management Plan (Version 2 of 28/03/2020) to guide all actions aimed at managing all such fire incidents.</p>	Complied
7.11.2	<p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.</p> <p>- Minor compliance -</p>	<p>OPG has developed a Plantation Fire Management Plan; Document No. DS-PRP-02; Issue 2 of 28/03/2020. This plan has as main objective to: <i>“provide guidance for the planning and management of the potential fire threat in palm and rubber plantation, palm oil mills, housing areas and adjoining communities”</i></p> <p>This plan sets out OPG fire management actions across the entire unit of certification.</p>	Complied
7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>OPG carries out fire prevention training for its fire control brigade. Additionally, OPG carries out joint fire prevention activities with neighbouring communities. Reports of sensitization campaigns titled: Sensitization campaign in Mboukou, Guidouma, Rembo, Moutambe Sane Foumou, Migabe, Saint-Martin and Guiamba. Conducted in the period from August to September 2022 for Lot 1. The content included use of fire in savannah areas, fishing and hunting practices, IGA. Meetings held in Guidouma 11/08/2022; Mboukou: 09/08/2022; Doubou: 10/08/2022; Rembo: 06/08/2022; Moutambe Sane Foumou: 05/08/2022.</p>	Complied

		<p>Report on Sensitization on Fires in Lot 2: 14, 15, 16 and 28th September 2022, by Social Services Team.</p> <p>Attendance sheets:</p> <p>28/09/2022: Boungounga village</p> <p>15/09/2022: Kanana Village</p> <p>14/09/2022: Fanguidaka Village</p> <p>15/09/2022: Lambarene Kili</p> <p>16/09/2022: Diangui village</p>	
<p>Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.</p>			
<p>7.12.1</p>	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	<p>OPG conducted an HCV assessment as part of the SEIA. Specifically, section 3.3.6 focuses on "Assessment and Cartography of HCVs"</p> <p>Additionally, OPG commissioned an independent HCV/HCS study conducted by Proforest. Titled: HCV Assessment Olam Palm Gabon Mouila Lot 2; 31,801Ha Concession Northeast of Mandji Town, Ngounie Province, Gabon. Dated December 2013.</p> <p>The study identified HCV1 (forests, great apes, elephants,); HCV4 (ecosystems providing water for local people, water catchment services, e.g. control of erosion of vulnerable soils and and slopes, prevention of soil erosion, slope forests); HCV5 (local people's needs: watercourses providing food, fuel and income) and HCV6 (cultural values: sacred sites, old villages, cemeteries)</p> <p>For LOT 1</p>	<p>Complied</p>

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		<p>OPG conducted an independent HCV assessment titled: HCV Assessment Olam Palm Gabon, 35,354 Ha Concession North of Mouila, Final Version may 2012, conducted by Proforest, with Christopher Steewart as Lead (christopher@proforest.net).</p> <p>The study identified 1.2 and 1.3, HCV 3, HCV 4.1, HCV 5 and HCV 6. The study proposed management options for all the different HCVs found.</p> <p>Moreover, no new plantings have been carried out by OPG in Mouila Lot 1 since 15 November 2018. All planted area has been subjected to the RSPO New Planting Procedure with public notification on the RSPO website.</p>	
7.12.2	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p>PROCEDURAL NOTE: For details of transitional measures, refer to Annex 5: RSPO transition from HCV assessments to HCV-HCSA assessments. - Critical (Major) compliance -</p>	<p>Olam Palm Gabon has not carried out any new planting after 15 November 2018. However, OPG conducted an independent HCV assessment (HCV Assessment Olam Palm Gabon, 33.354 Ha Concession North of Mouila, Final Version May 2012). The study was conducted by Proforest.</p>	Complied
7.12.3	<p>In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national</p>	<p>No new plantings have been carried out by OPG in Mouila Lot 1 since 15 November 2018. All planted area has been subjected to the RSPO New Planting Procedure with public notification on the RSPO website.</p>	Complied

	<p>multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.</p> <p>PROCEDURAL NOTE:</p> <p>There should be demonstrable benefits to the local community; clear recognition of legal and customary lands based on participatory land use planning; development should be proportional to the needs of the local community; with a balance between conservation and development. This procedure will also cover planting on previous or abandoned agricultural land / plantations. All other P&C requirements apply, including FPIC and HCV requirements.</p> <p>- Minor compliance -</p>		
<p>7.12.4</p>	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/ or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>Based on the management proposal made by Proforest, Olam develops an annual management plan that is implemented and monitored. The Management plan for 2022 was seen during the audit. Document No. 03/HCV PLAN/22, Of 06/2022, Titled Plan de Gestion des HVC, Olam palm Gabon Plantation Mouila Lot 1.</p> <p>HCV Monitoring reports were seen during the audit. These reports are titled "Rapport Mensuel SMART Mouila Lot 1" Period: October 2022, September 2022 and August 2022 were seen during the audit, i.e. Report No. 10/2022, No. 9/2022, and No. 8/2022, respectively. The reports cover signs of animals in HCV 1 that were identified in the HCV assessment e.g. sightings, and other animal signs. The reports equally outline all human signs such traps, bush fires, debris. The report equally records the number of palms destroyed by elephants.</p> <p>HCV sensitization campaigns are conducted to inform populations about conservation status and hunting practices. Minutes of meetings with Olam workers were seen.</p> <p>Meeting of 03/04/2022 and 15-16/03/2022</p>	<p>Complied</p>

		Minutes of meetings on laws and regulations on customary user rights, hunting and fishing, held on 16/03/2022 was seen during the audit.	
7.12.5	Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas. - Minor compliance -	Based on the HCV assessment conducted by Proforest and previously cited, social HCVs including HCV 5 and HCV 6 were identified in the concession area. The HCV management plan shows that different stakeholders including local communities were duly consulted. Consultations with communities as well as government officials during the period of the audit confirmed that they were consulted during the HCV assessment and the development of the HCV management plan. Additionally, communities confirmed that OPG does not prevent them from accessing the social HCVs. HCV sensitization campaigns are conducted to inform populations about conservation status and hunting practices. Minutes of meetings with Olam workers were seen. Meeting of 03/04/2022 and 15-16/03/2022 Minutes of meetings on laws and regulations on customary user rights, hunting and fishing, held on 16/03/2022 was seen during the audit.	Complied
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species. - Minor compliance -	Additionally, OPG commissioned an independent HCV/HCS study conducted by Proforest. Titled: HCV Assessment Olam Palm Gabon Mouila Lot 2; 31,801Ha Concession Northeast of Mandji Town, Ngounie Province, Gabon. Dated December 2013. The study identified HCV1 (forests, great apes, elephants,); HCV4 (ecosystems providing water for local people, water catchment services, e.g. control of erosion of vulnerable soils and and slopes, prevention of soil erosion, slope forests); HCV5 (local people’s needs: watercourses providing food, fuel and income) and HCV6 (cultural values: sacred sites, old villages, cemeteries) For LOT 1	Complied

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		<p>OPG conducted an independent HCV assessment titled: HCV Assessment Olam Palm Gabon, 35,354 Ha Concession North of Mouila, Final Version may 2012, conducted by Proforest, with Christopher Stewaart as Lead (christopher@proforest.net).</p> <p>The study identified 1.2 and 1.3, HCV 3, HCV 4.1, HCV 5 and HCV 6. The study proposed management options for all the different HCVs found.</p> <p>Based on the HCV Management proposals made by Proforest, OPG has developed an HCV monitoring system with daily reports and condensed monthly reports (SMART) as evidenced by:</p> <ul style="list-style-type: none"> • Monthly SMART Report Mouila LOT2: period 01-30 July, SMART ID: 0000007, No07/2022 • Monthly SMART Report Mouila LOT2: period 01-30 August, SMART ID: 0000008, No08/2022 • Monthly SMART Report Mouila LOT2: period 01-30 September, SMART ID: 0000009, No09/2022 • Monthly SMART Report Mouila LOT2: period 01-30 October, SMART ID: 000010, No10/2022 <p>The reports include animal sign signs, siting, and the use of came traps to monitor RTE movements through the HCV.</p>	
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>As mentioned in 7.12.6 above, OPG monitors all HCVs, and RTEs using the SMART application. Daily monitoring activities, including sighting of RTEs and other species. These daily activities are consolidated to produce weekly, monthly and annual reports as mentioned in 7.12.6 above.</p> <p>Camera traps are used for monitoring, results are collected twice a year in 3 months intervals (dry season and rainy season).</p> <p>Interviews with OPG HCV team revealed that these results are used to prepare and implement further monitoring plans and activities as evidenced in the recent review of Elephant Control Strategy titled: Olam Palm Gabon –</p>	Complied

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		Elephant Control, Reviewed Strategy to Effectively address crop destruction, Version 6, February 2021).	
7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV- HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	No new plantings have been carried out by OPG in Mouila Lot 1 since 15 November 2018. All planted area has been subjected to the RSPO New Planting Procedure with public notification on the RSPO website.	Complied

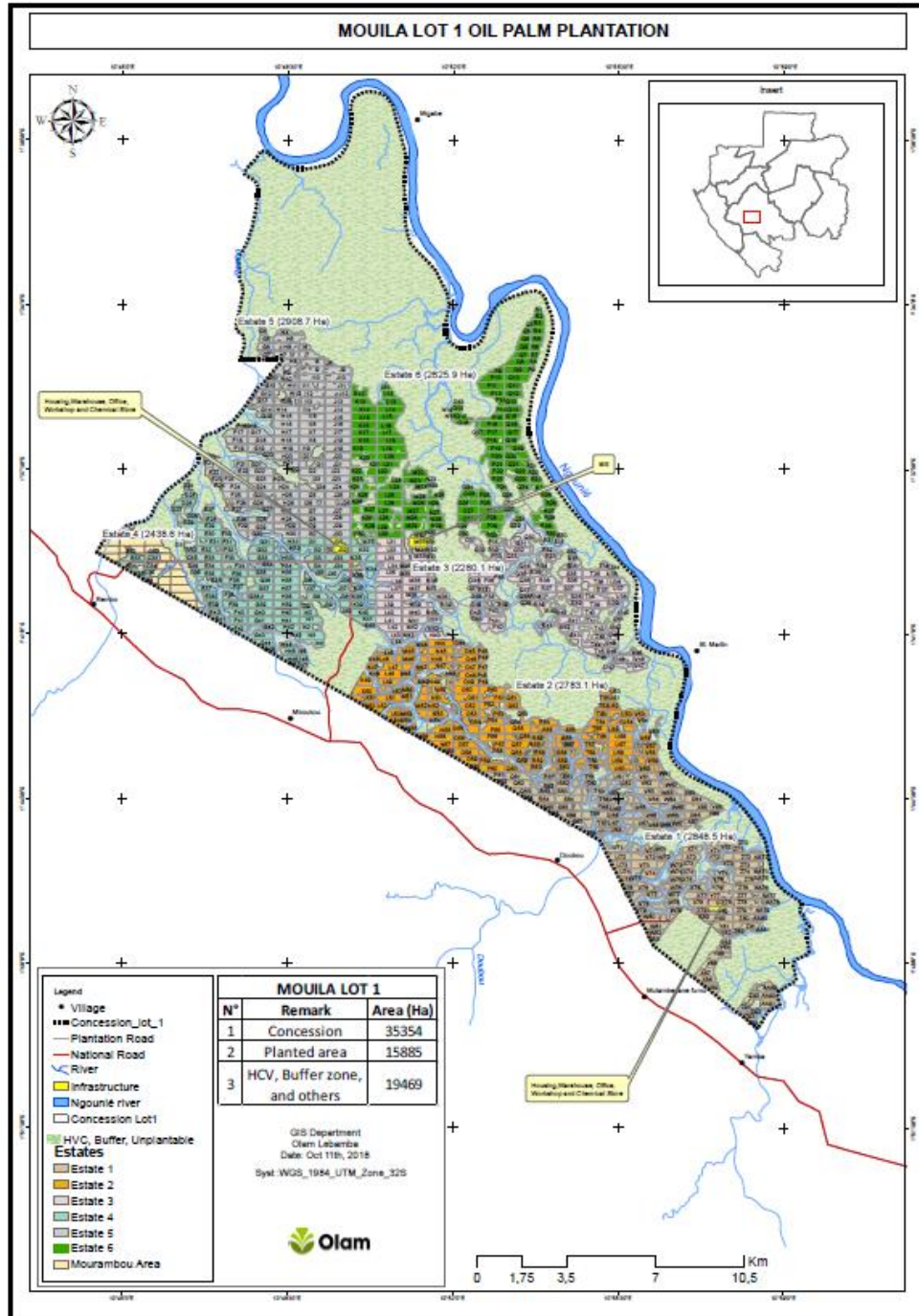
Appendix B: GHG Reporting Executive Summary - Not audited as this is scope extension audit for SCC model

Appendix C: Location Map of Certification Unit and Supply bases

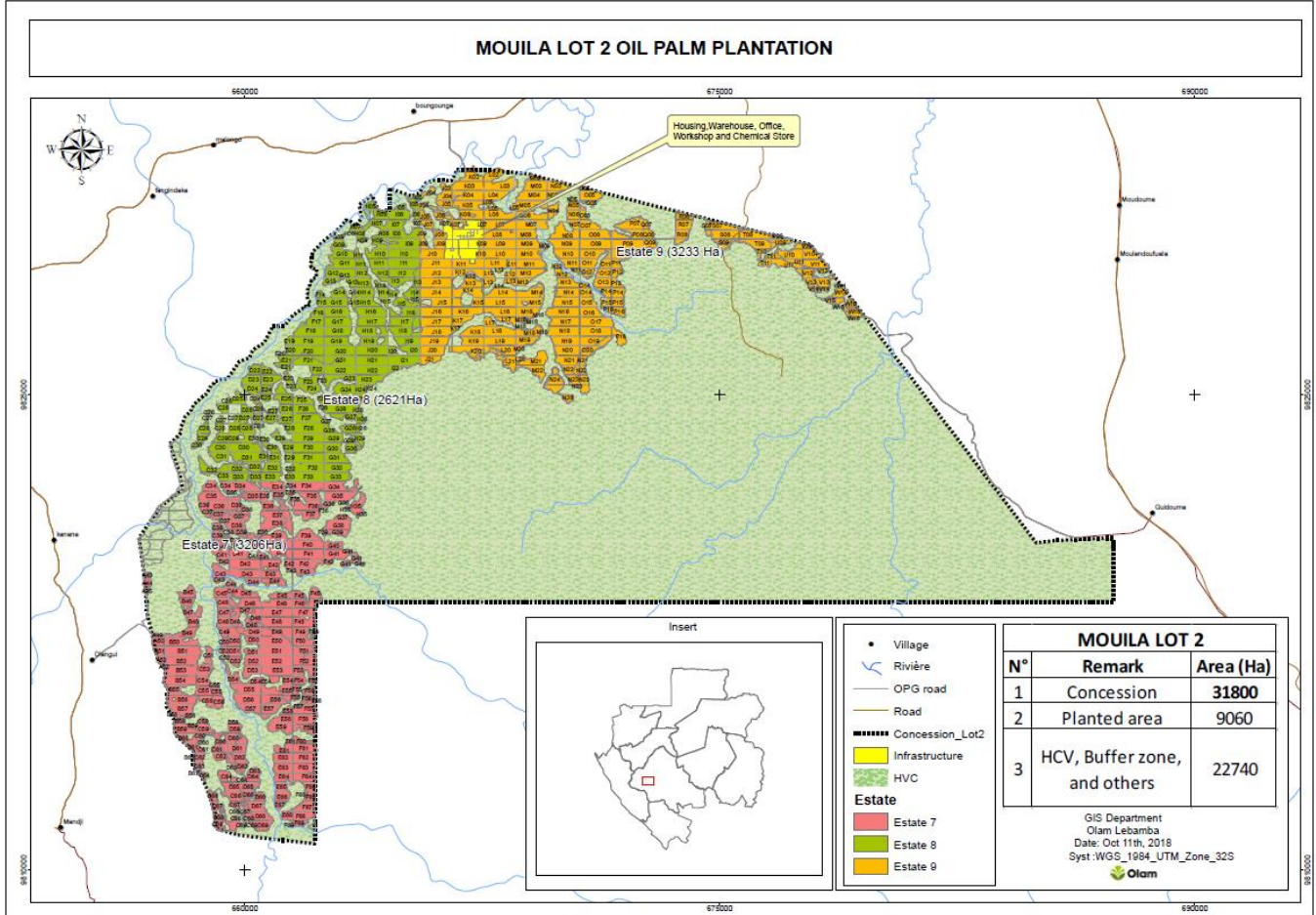


Appendix D: Estate Field Map

Lot 1 Plantation



Lot 2 Plantation



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Appendix E: List of Smallholder Registered and/or sampled

No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
	Not applicable								
Total									
Note: * are smallholders sampled in this audit.									

Appendix F: List of Abbreviations

a.i	Active Ingredient
BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
CSPO	Certified Sustainable Palm Oil
CSPKO	Certified Sustainable Palm Kernel Oil
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GMP	Good Manufacturing Practice
GPS	Global Positioning System
HCV	High Conservation Value
IPM	Integrated Pest Management
IP	Identity Preserved
IS - CSPO	Independent Smallholder Certified Sustainable Palm Oil
IS – CSPKO	Independent Smallholder Certified Sustainable Palm Kernel Oil
IS – CSPKE	Independent Smallholder Certified Sustainable Palm Kernel Expeller
ISCC	International Sustainable Carbon Certification
ISS	Independent Smallholder Standard
LD50	Lethal Dose for 50 sample
MB	Mass Balance
MSDS	Material Safety Data Sheet
MT	Metric Tonnes
OER	Oil Extraction Rate
OSH	Occupational Safety and Health
PK	Palm Kernel
PKO	Palm Kernel Oil
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RSPO	Roundtable on Sustainable Palm Oil
P&C	Principles & Criteria
RTE	Rare, Threatened or Endangered species
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure