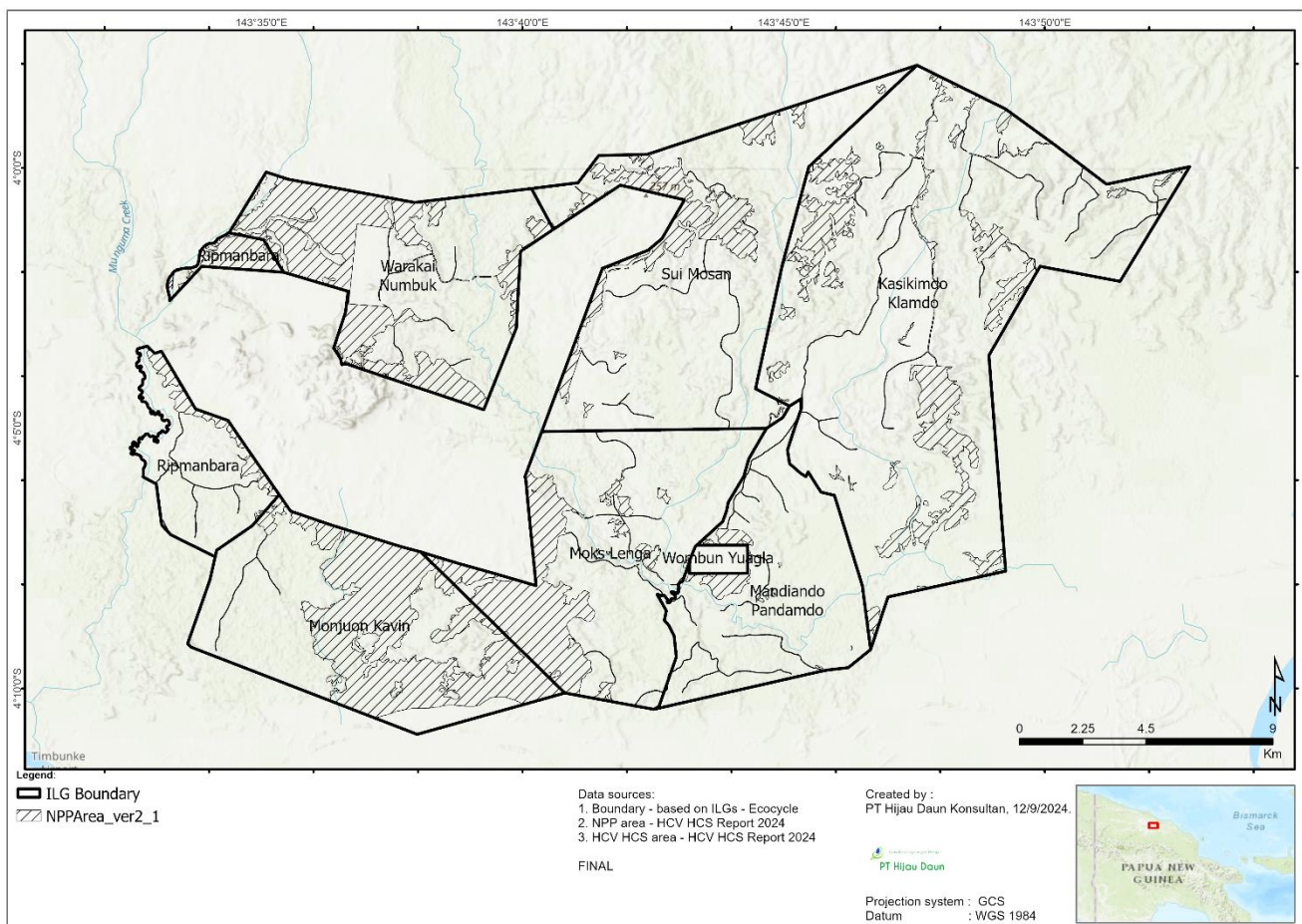


New Planting Procedure – Notification Statement

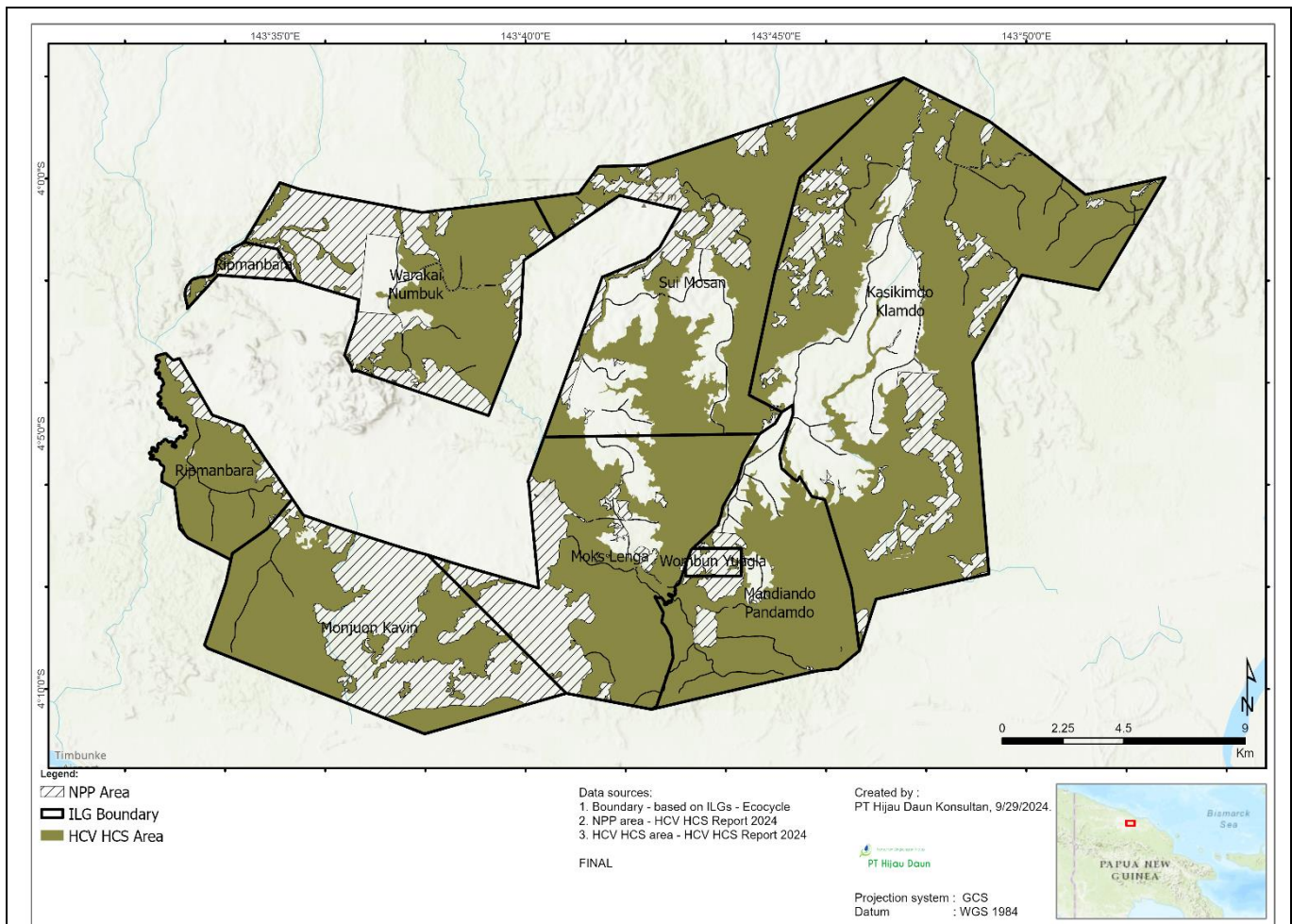
 Roundtable on Sustainable Palm Oil		
NPP Reference Number	GGC-ECO-NPP-2025	
Country of the NPP Submission:	Papua New Guinea	
RSPO Membership Number	1-0493-24-000-00	
Name of Subsidiary (if any):	Not Applicable (N.A)	
Name of Management Unit:	Ecocycle Limited	
Name(s) of Estate(s) covered under this management plan:	-	
Location of NPP area:	Angoram District, East Sepik Province, Papua New Guinea	
Address of NPP area:	Mundo-Mundo Village, Poimbit Village, Sarapa Village (Sarapa Village is under Warakai Numbuk ILG as per HCV report page 85, Kanduanum Village, Angoram/Middle Sepik LLG, Angoram District, East Sepik Province, Papua New Guinea	
Business/operation Permit Reference Number and Issuing Authority:	<ul style="list-style-type: none"> • No. 1-123480236 by PNG Registrar of Companies • Sub-lease agreements between lessor and lessee, i.e : <ol style="list-style-type: none"> 1. Mandiando Pandamdo Investment Ltd (as representative of the customary landowners (ILG Mandiando Pandamdo)) and Pacific Elite Investment Ltd for Sagadik land 2. Kasikimdo Klamdo Investment Ltd (as representative of the customary landowners (ILG Kasikimdo Klamdo)) and Pacific Elite Investment Ltd for Kionung Kalkap Land 3. Sui Mosan Agro Ltd (as representative of the customary landowners (ILG Sui Mosan)) and Pacific Agro Capital Ltd for Kaurinwia Land 4. Moks Lenga Agro Ltd (as representative of the customary landowners (ILG Moks Lenga)) and Pacific Agro Capital Ltd for Sagim land 5. Warakai Numbuk Investment Ltd (as representative of the customary landowners (ILG Warakai Numbuk)) and Pacific Agro Capital Ltd for Yamban Land 6. Ripmanbara Holdings Ltd (as representative of the customary landowners (ILG Ripmanbara)) and Pacific Agro Capital Ltd 7. Anglando Makar Holdings Ltd (as representative of the customary landowners (ILG Monjuon Kavin)) and Pacific Agro Capital Ltd for Singambe Land 8. Wombun Yuagla Agro Ltd (as representative of the customary landowners (ILG Wombun Yuagla) and Sepik Palm Oil Ltd 	

Size information (ha)	a) Total area as per permit:	± 46,568.33 Ha
	b) Area for new planting:	± 10,361.01 Ha
	c) HCV area (if any):	± 26,554.48 Ha
	d) HCS forest (if any):	± 22,938.50 Ha
	e) Peatland (if any):	± 16.29 Ha
	f) Steep terrain (if any):	-
	g) Riparian buffer (if any):	-
	h) Marginal and fragile soil (if any):	-
Projected GHG emissions	1,142.24 tCO ₂ e	
Geospatial Coordinates	143° 43.69' 0.00" E; 04° 07.50' 0.00" S	

Boundary Maps



Picture 1.a. Proposed of NPP areas and the customary land owner areas



Picture 1.b NPP areas, the customary land owner areas and HCV-HCS areas

Areas and proposed time for new planting

Location	Proposed Time Plan for Development		Approx. size of clearing
	Month	Year	
Kasikimdo-klamdo/Mandiando-pandamdo /Sui-mosan	June to May	2025/2026	± 3,253.35 Ha
Moks-lenga/Warakai-numbuk	June to May	2026/2027	± 3,777.53 Ha
Ripmanbara/Monjuon-kavin	June to May	2027/2028	± 3,330.13 Ha
TOTAL			± 10,361.01 Ha

Summary of the NPP Verification by CB

The total areas of Ecocycle's lease areas is ± 46,568.33 Ha and there is part of areas it has planted oil palm trees with year of planting of 2015-2023, as own oil palm plantation areas. Ecocycle's land has planted and will be planting is totally on customary land which is mobilised through lease-lease back arrangements with the customary land owners, using Incorporated Land Groups (ILG). In year 2023, the company took over management control over two estates in East Sepik and has taken over the management of the assets of three

companies i.e Pacific Elite Investment Ltd (oil palm plantation company), Pacific Agriculture Company Ltd (oil palm plantation company) and Sepik Palm Oil Holdings Ltd (palm oil mill). There is joint venture agreement between Ecocycle Limited and Pacific Agro Capital Limited (PACL) & Pacific Elite Investment Limited (PEIL) date on 5 August 2024. Refer to JV agreement that PACL and PEIL are authorised and entitled to use and develop the oil palm land pursuant to the principal land use and development agreement and they are existing oil palm operators and has been acquiring land and clearing land for plantation and harvesting of FFB through leases obtained. Whereas, Ecocycle shall undertake the full development of the oil palm land and manage fully and solely the existing operations of PACL and PEIL in accordance to the terms herein created refer to the JV obligations.

Ecocycle is a member of the RSPO since dated on 20 September 2024 and is pursuing an expansion plan and is seeking to increase its planted area in the next few years (in customary land) so that they will be completing NPP prior to undertaking any new planting. The NPP verification will carry out against new development areas on remain of ecocycle areas which has not been land clearing activity. The scope of NPP assessment is not include oil palm plantation areas has planted and land has cleared before NPP verification process has finished.

The NPP verification has conducted through document verification, interview and on-site visit. GGC auditor has conducted document verification/review and interview (company and/or site management, previous landownerships, chairman LOC & leader in communities) on 02-04 December 2024 and on-site visit on 02-03 December 2024. During audit, NPP team has involved competence person as local expert and interpreter to local language.

New planting areas inside on development/project areas so that the customary landowners/ILG has understood that their lands will be developing into an estate producing commercial crops where one of commodities is oil palm since year 2016. It has stated on each land lease and development agreements. Based on information above so the information on the proposed areas for new planting has been communicated by transparently to representative of land owners and ILGs by the company until the NPP verification is carried out.

At the time of field verification that auditor was found any lands has planted oil palm plantation, palm oil mill, infrastructures (road, housing, office, bridge, etc) by company. The proposed of new planting areas before NPP process has finished so that it is exclude as subject of NPP areas.

Summary of verification document, interview and field visit result about environmental, soil & topography, HCV-HCS, GHG & LUCA issues as belows :

- Representative of company management said the company still have obligation to developing oil palm plantation on remain of land bank areas.
- Ecocycle have some policies for all its operation and production chain where one of policies i.e sustainability policy, environment and biodiversity policy, bussiness conduct and ethical policy, human right policy, OSH policy, social policy, etc
- Auditor has selected 8 sample of locations but can be visited to 7 sample of locations only because any limite of access to visiting ILG of Ripmanbara areas which need \pm 1 day by walking. 6 of 7 sample of locations has installed signboard of new planting areas. Some informations on signboard is name of company (Pacific Elite Investment Limited (PEIL) & Pacific Agro Capital Limited (PACL)), propose of new planting areas & type of land cover, total of areas, coordinate, ILG name and land title number.
- Chairman or representative of Monjuon Kavin ILG has understood that Singambe land is one of new planting areas although signboard of New Planting has not been installed. Other ILGs on sample of locations is Kasikimdo Klamdo, Sui Mosan, Warakai Numbuk and Moks Lenga.
- Land cover on all sample of locations is grassland majority except 1 sample of location has been covered with like as scrub, topography is flat, found former animal shepherding and near new planting areas has found sago trees on swamp areas.
- There are 2 sample of locations near oil palm plantation (mature & immature) which owned by ecocycle but it is exclude from scope of NPP verification i.e new planting areas on ILG of Kasikimdo Klamdo areas with long : 9549173; lat : 810754 and ILG of Warakai Numbuk with long : 790845; lat : 9555463) .

- Auditor has found mark/sign of buffer zone with HCV and/or HCS areas and community areas/village in 2 points/sample of locations which near HCV and/or HCS areas or community areas/village (sample of location with coordinate is long : 803191; lat : 9555119 (ILG of Sui Mosan) and long : 796992; lat : 9545136 (ILG of Moks Lenga)).
- Some HCV areas near sample of locations still in good-condition but any HCV areas was changed/opened as road or access to new planting areas (lat : 807822; long : 9558018).
- Interview result with chairman or representative of ILG that they has understood about new planting areas, HCV-HCS and/or other conservation areas (as sample is river) shall be conserve or can't opening/clearing, need bounday pillar in each new planting areas as sign/mark, etc.
- Expansion of the existing oil palm estate would not be classified as high risk so EIA not required for ecocycle but the company has carried out SEIA by third party/independent consultant (on behalf company), participatory and comprehensive. Social and Environmental document has identified impact and creating social & environmental impact management plan. Scope of SEIA is all ecocycle areas (\pm 46,568.33 Ha).
- Soil suitability and topographic survey was carried by company with scope of survey is all ecocycle areas (\pm 46,568.33 Ha). There are small areas of peat soils (histosol) identified which associated with the swamp areas near the Sepik river. It is outside the scope of new planting areas. Whereas, majority of steep soil is flat.
- Integrated HCV-HCSA assessment has carried out by ALS HCV assessor on ecocycle ltd areas and it has reviewed by HCV-RN with satisfactory status. HCSA and HCV1 to HCV6 was presented on ecocycle areas.
- GHG calculation was carried out by third party on behalf company with preferred scenario is scenario 1 (no development of community use /HCV or HCS areas and no community use to be developed) with total of develop areas is 10,361.01 Ha from land cover classification of grassland and shrub land.
- As the NPP requirement, company also already carried out a Land Use Change Analysis (LUC analysis) to ensure deforestation situation due to land development for palm oil. Result of LUC analysis methodology review still "not pass" during audit. The study consisted of a systematic land use changes analysis with the use of comparative satellite imagery, which shows the land use of the proposed area for the period 2005 – 2023. The LUCA consist of before 1 November 2005, 1 November 2005 to 30 November 2007, 1 December 2007 to 31 December 2009, 1 January 2010 to 10 May 2014, 10 May 2014 to HCV assessment. Land cover class from analysis result is garden, grassland, low density forest (LDF), medium density forest (MDF), oil palm, open area, sago, settelement, shrub, scrub swamp, WB and young regeneration forest (YRF). Any area of non-complaint land clearance, any area of conservation liability and any environmental remediation.
- The summary of each assessment has displayed on NPP summary of assessment report. Whereas, integration management plan each assessment has shown on NPP Integration management plan.

Summary of verification document, interview and field visit result about FPIC, land title and boundary and land compensation issues as belows :

A comprehensive verification process was conducted to assess Ecocycle Limited's compliance with Free, Prior, and Informed Consent (FPIC), legal land tenure, boundary demarcation, and land compensation practices. This verification involved document reviews, stakeholder interviews, and field inspections to confirm the legitimacy and transparency of land acquisition, land-use agreements, and compensation processes. The findings confirm that Ecocycle has adhered to legal and sustainability standards, ensuring proper land governance and fair treatment of affected communities.

The full Integrated High Conservation Value (HCV) and High Carbon Stock (HCS) Approach Assessment Report for Ecocycle Limited can be accessed at the HCV Network website:

<https://www.hcvnetwork.org/reports/integrated-highconservation-value-highcarbon-stock-approachassessment-report-ecocycleltd-east-sepik-province-papuanew-guinea>

Free, Prior, and Informed Consent (FPIC) Verification

The FPIC process ensures that landowners and affected communities have been fully informed and have voluntarily consented to land transactions before plantation development. The verification process reviewed legal agreements, consultation records, and field evidence to establish whether FPIC principles were followed.

- Documents Reviewed:
 - o Signed FPIC Agreements, confirming that landowners consented to the transactions .
 - o Community Consultation Meeting Minutes, demonstrating that stakeholders were engaged in discussions before signing agreements.
 - o Participatory Mapping Reports, proving that landowners actively participated in defining land boundaries.
- Interviews Conducted:
 - o Landowners and community representatives confirmed that consultations were conducted before signing agreements.
 - o Government authorities and legal experts verified that FPIC principles were followed, ensuring voluntary participation.
 - o Field Visit Results:
 - o Community engagement meetings were observed, confirming transparency in the FPIC process.
 - o Signboards marking plantation areas were physically verified at different sites, indicating community-approved land-use agreements.

The findings confirm that Ecocycle has implemented the FPIC process correctly, ensuring that affected communities were fully aware of the terms and implications of land development.

1. Land Title and Boundary Verification

To establish the legality of land tenure and proper boundary demarcation, a review of land titles, lease agreements, and physical boundary markers was conducted.

- Documents Reviewed:
 - o Land Lease and Development Agreements, outlining the legal ownership and leasing terms .
 - o Land Group Incorporation (ILG) Records, confirming official recognition of customary landowners.
 - o Participatory Mapping Reports, showing land demarcation and validation by stakeholders .
 - o Field Visit Results:
 - Boundary markers were physically verified, ensuring alignment with lease agreements.
 - GPS coordinates of boundaries were cross-checked with legal maps to confirm accuracy.
 - Signboards identifying land titles and ownership details were observed in key locations.

The verification confirms that Ecocycle has documented legal land titles, physically marked boundaries, and complied with land governance requirements.

2. Land Compensation Issues and Resolution

The assessment of land compensation practices involved financial record verification, stakeholder discussions, and negotiation agreements to ensure that landowners received fair compensation.

- Documents Reviewed:
 - o Sub-Lease Agreements between Lessors and Lessees, detailing compensation terms and revenue-sharing models

- o Records of Compensation Payments, confirming that affected landowners received fair financial compensation
- o Minutes of Compensation Negotiations, demonstrating that stakeholders actively participated in decision-making
- Interviews Conducted:
 - o Landowners confirmed that payments were made as per agreements.
 - o Community leaders acknowledged fair and transparent negotiation processes.
 - o Local authorities verified that no forced acquisitions or disputes over compensation were reported.

The findings indicate that Ecocycle has implemented a fair compensation system, documented all agreements, and ensured that landowners were properly consulted and compensated.

Conclusion verification document, interview and field visit result about FPIC, land title and boundary and land compensation issues

The verification process confirms that Ecocycle has complied with FPIC, legal land acquisition processes, boundary demarcation, and compensation principles. The company has demonstrated transparency in stakeholder engagement, fair compensation practices, and legal compliance with PNG land tenure laws and RSPO standards.

- FPIC compliance was verified through stakeholder interviews, signed agreements, and independent consultations.
- Land titles and boundaries were properly documented, marked, and confirmed through GPS verification.
- Compensation was fairly distributed, and all negotiation records were available for verification.


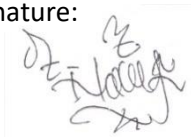
This audit confirms that Ecocycle's land tenure and compensation framework aligns with RSPO and PNG legal requirements, ensuring sustainability, compliance, and community participation.

References :

- Sui Mosan Land Lease and Development Agreement – Legal documentation of land acquisition .
- Ecocycle SEIA Report – FPIC documentation, land dispute records, and consultation evidence .
- Sub-Lease Agreements Between Lessors and Lessees – Verification of land compensation and leasing terms.
- KACE09 Land Dispute Documents – Historical records of land disputes and resolutions .
- GPS Verified Boundary Markers – Physical verification of legal land demarcation.
- Participatory Mapping Reports – Evidence of community involvement in land surveys .
- Minutes of Compensation Negotiations – Documentation of discussions and payment agreements
- Mandiando Pandamdo Investment Ltd (ILG Mandiando Pandamdo) and Pacific Elite Investment Ltd – Sagadik Land
- Kasikimdo Klamdo Investment Ltd (ILG Kasikimdo Klamdo) and Pacific Elite Investment Ltd – Kionung Kalkap Land
- Sui Mosan Agro Ltd (ILG Sui Mosan) and Pacific Agro Capital Ltd – Kaurinwia Land
- Moks Lenga Agro Ltd (ILG Moks Lenga) and Pacific Agro Capital Ltd – Sagim Land
- Warakai Numbuk Investment Ltd (ILG Warakai Numbuk) and Pacific Agro Capital Ltd – Yamban Land
- Ripmanbara Holdings Ltd (ILG Ripmanbara) and Pacific Agro Capital Ltd
- Anglando Makar Holdings Ltd (ILG Monjuon Kavin) and Pacific Agro Capital Ltd – Singambe Land

Conclusion

The GGC auditor were present with the management team of ecocycle on that time to verify the findings of the desk study and held further discussions on the review and verification conducted. It is opinion of auditor that all assessment documents and integrated management plan are comprehensive, professional and complied to RSPO requirements (principle, criterion and indicator).

Acknowledgement by RSPO Member	Ecocycle Limited acknowledges that this NPP submission had been conducted in accordance with the New Planting Procedure year 2021. All assessments had been carried out accordingly and without any prejudice. Ecocycle Limited will ensure all legal requirements are continuously met pre, during and post development of this NPP area.	
Confirmation by Certification Body	The work recorded in this NPP submission by Ecocycle Limited at Angoram District, East Sepik Province, Papua New Guinea has been verified by GGC and has been carried out in accordance with the requirement of the RSPO New Planting Procedure year 2021 for the time being in force and in that respect that this area is considered satisfactory for development of new plantings.	
Signatures	RSPO Members	Certification Body
	Name of Person Responsible: Leslee Ng	Name of Lead Auditor : Hendra Fachrurozy
	Designation: Chief of Operation (COO)	Designation: Lead Auditor
	Signature: 	Signature: 
	Date : 03 March 2025	Date : 03 March 2025