

	32. Perombata Ext. (Haintapa Clan) 33. Perombata Ext. (Sorupa Clan) 34. Portion 2 35. Pupu 36. Saura (Portion 919) 37. Serembe - Arehu Oga 38. Serembe - Ohogo 39. Sifia					
	40. Siko 41. Topiripa Extension					
		42. Wanipa Extension				
Location of NPP area:	Papua New Guinea, Oro Province					
Address of NPP area:	Sime Darby Plantation – NBPOL Higaturu Oil Palm					
	Address: POPONDETTA, ORO PROVINCE, PAPUA NEW					
	GUINEA.					
Business/operation Permit Reference Number and	Site	Proposed Estate	Tenure ¹			
Issuing Authority:	Ref.					
	ND01	Topiripa	SUB- LEASED THROUGH			
		Extension	AN ILG			
	ND02	Hougapa	SUB- LEASED THROUGH			
			AN ILG			
	ND03	Perombata	SUB- LEASED THROUGH			
		Extension	AN ILG			
	ND04	Perombata	SUB- LEASED THROUGH			
		Extension	AN ILG			
	ND05	Kovenopa	SUB- LEASED THROUGH			
		Sambura	AN ILG			
	ND06	Owate	SUB- LEASED THROUGH			
		Owate	AN ILG			
	ND07	Sefia	SUB- LEASED THROUGH			
	NDO	Jena	AN ILG			
	ND08	Kofureta	SUB- LEASED THROUGH			
	אטטאו	Handiria	AN ILG			
	ND 00					
	ND09	Pupu	SUB- LEASED THROUGH AN ILG			
	ND10	Houembo	SUB- LEASED THROUGH			
		Kosote	AN ILG			

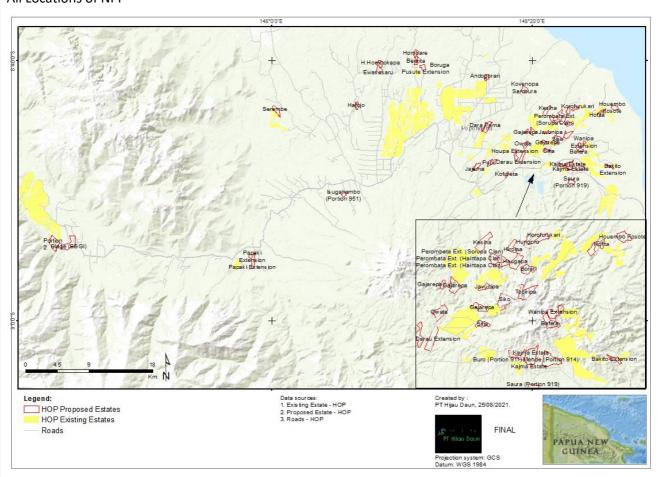
¹ CL = Customary Land, SL = State Lease , LTC = Land Tenure Conversion (customary land but with clear title usually registered to a single clan member rather that communal or clan name (ILG))

	Jajama	SUB- LEASED THROUGH		
ND12		SUB- LEASED THROUGH AN ILG		
INDIZ I	Portion 2	SL		
ND13	Dara Pema	SUB- LEASED THROUGH AN ILG		
ND14	Darau Extension	SUB- LEASED THROUGH AN ILG		
ND15	Javunipa	SUB- LEASED THROUGH AN ILG		
ND16	Bakito Extension	SUB- LEASED THROUGH AN ILG		
	Mende (Portion 914)	State Lease		
1	Buro (Portion 911)	State Lease		
	Saura (Portion 919)	State Lease		
1	Wanipa Extension	SUB- LEASED THROUGH AN ILG		
ND21	Bafera	SUB- LEASED THROUGH AN ILG		
ND22	Korofurukari	SUB- LEASED THROUGH AN ILG		
ND23	Hungoro	SUB- LEASED THROUGH AN ILG		
ND24	Borari	SUB- LEASED THROUGH AN ILG		
ND25	Siko	SUB- LEASED THROUGH AN ILG		
ND26	Hiroipa	SUB- LEASED THROUGH AN ILG		
ND27	Hofita	SUB- LEASED THROUGH AN ILG		
ND28	Kesiha	SUB- LEASED THROUGH AN ILG		
ND29	Gajarepa	SUB- LEASED THROUGH AN ILG		
ND30	Houpa Extension	SUB- LEASED THROUGH AN ILG		
	Boruga Pusute Extension	SUB- LEASED THROUGH AN ILG		

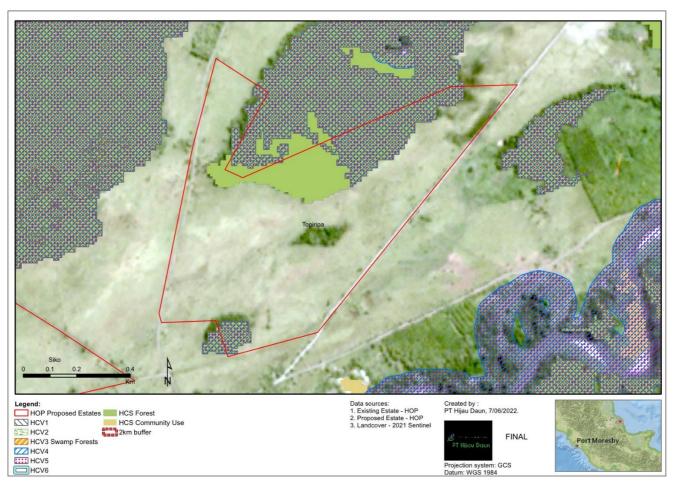
	ND32	Beririta	SUB- LEASEI AN ILG	O THROUGH		
		Hombare	SUB- LEASED THROUGH AN ILG			
	ND34	D34 Handari SUB- LEASE AN ILG		O THROUGH		
	ND35	Ewasasaru	SUB- LEASED THROUGH AN ILG			
	ND36	ND36 Hajojoo SUB- LEASED AN ILG		O THROUGH		
	ND37 Andogorari SUB- LEAS AN ILG			O THROUGH		
	ND38	Serembe	SUB- LEASEI AN ILG	O THROUGH		
	ND39	Isugahambo (Por 951 LTC)	Private lease with an owner with a Freehold title (LTC)			
	ND40	Papaki Extension	SUB- LEASED THROUGH AN ILG			
	ND41	Papaki Extension	AN ILG			
	ND42	Kajma Estate				
Size information (ha)	a) Total	a) Total area as per permit: 2,256.54 ha				
	b) Area	for new planting:		1,843.75 ha		
	c) HCV area (if any):			206.77 ha		
	d) HCS f	orest (if any):		226.57 ha		
	e) Peatla	and (if any):		0		
	f) Steep	terrain (if any):		0		
	g) Riparian buffer (if any):			204.69 ha		
	h) Marg	inal and fragile soil (if any):		0		
Projected GHG emissions	(-0.84 in	(-0.84 in tonne CO2e)				
Geospatial Coordinates	8°45′ 42	8°45′ 42″ S ; 148° 14′ 14″E				
	I					

Boundary Maps

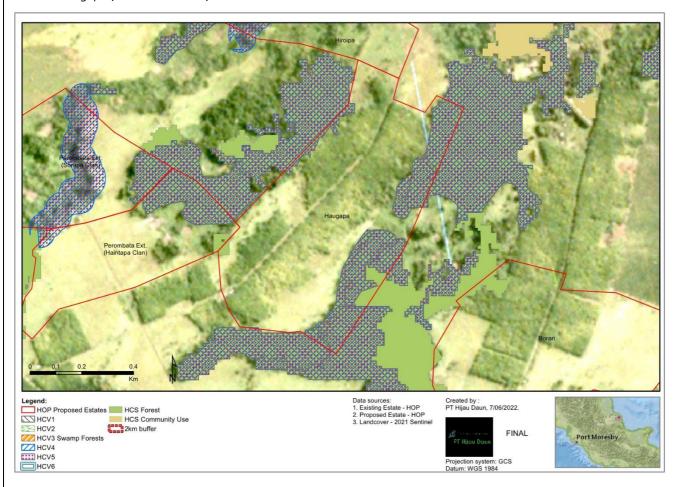
All Locations of NPP



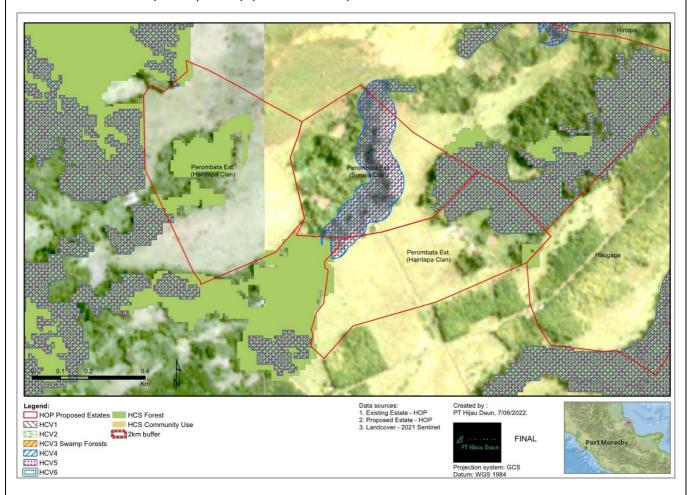
1. Topiripa Extension (ND01-69.18 Ha)



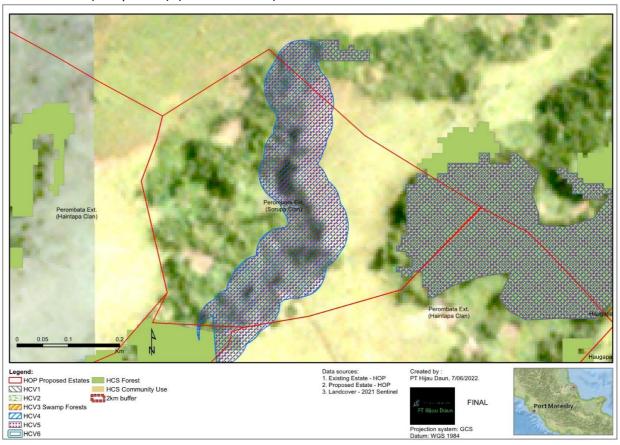
2. Haugapa (ND02-54.59 Ha)

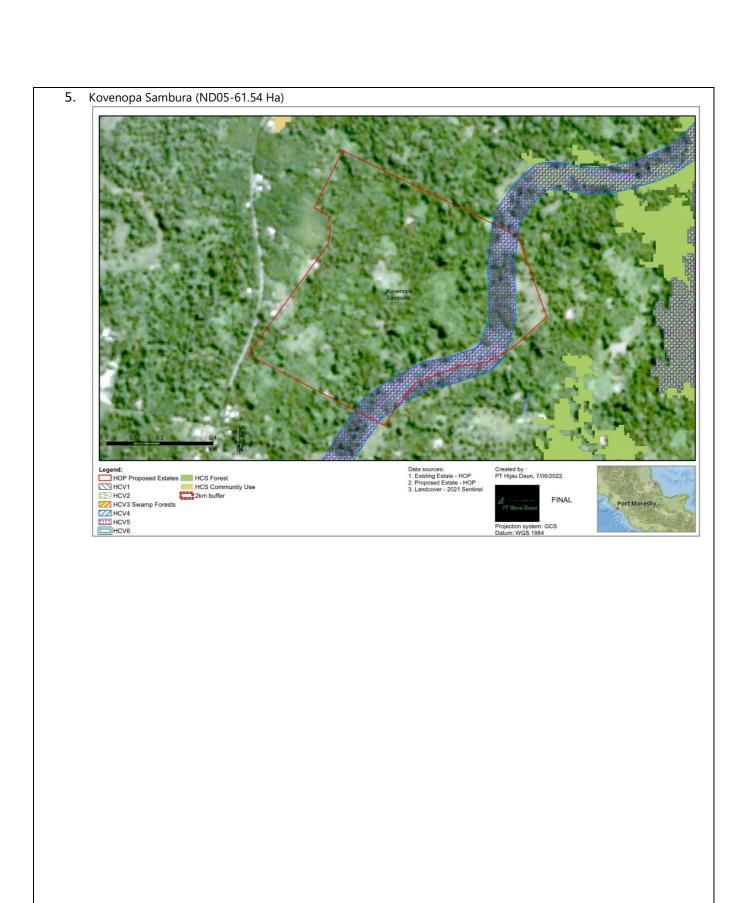


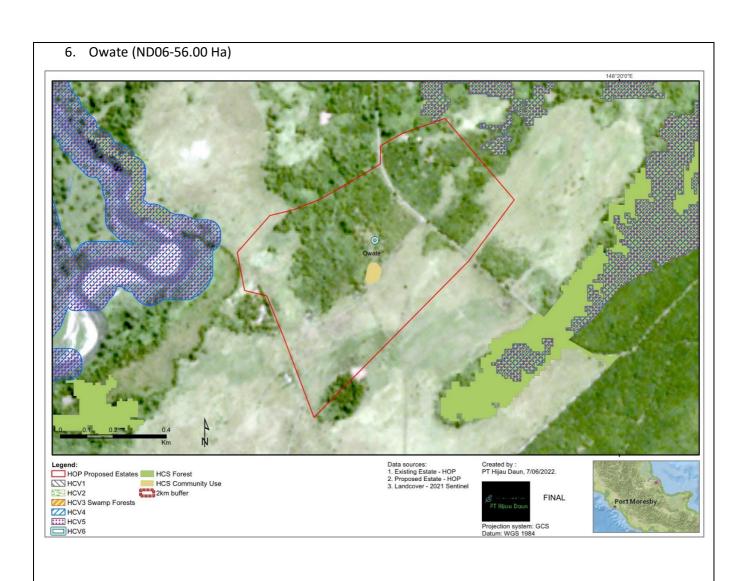
3. Perombata Ext (Haintapa Clan) (ND03-54.47 Ha)



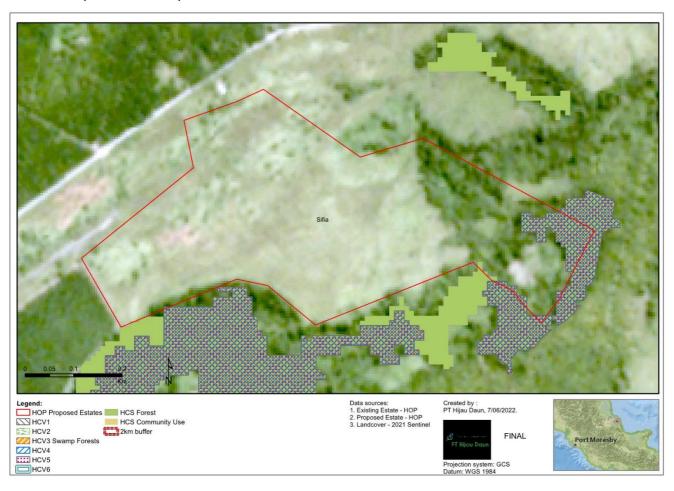
4. Perombata Ext (Sorupa Clan) (ND04-21.83 Ha)





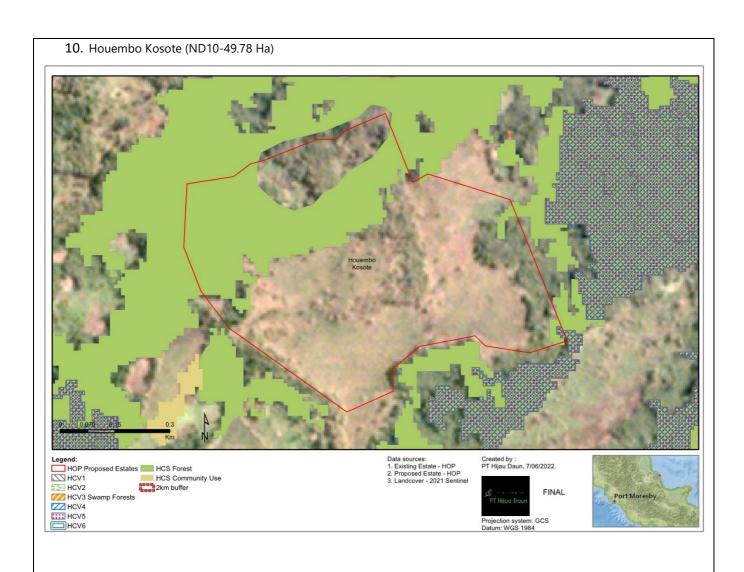


7. Sifia (ND07-28.26 Ha)

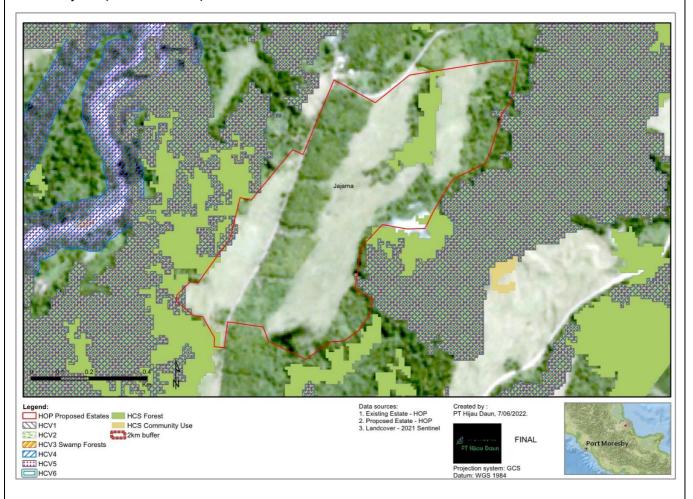


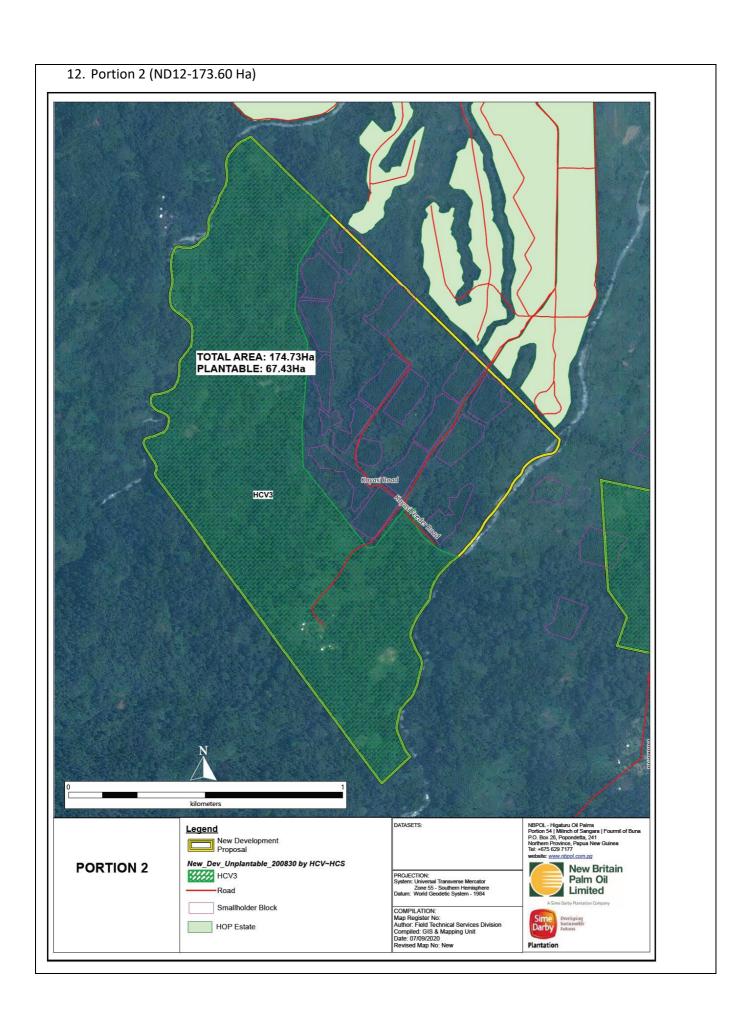
8. Kofureta (ND08-28.61 Ha) HCV3 Swamp Forests HCV4 HCV5 HCV6 Data sources: 1. Existing Estate - HOP 2. Proposed Estate - HOP 3. Landcover - 2021 Sentinel Port Moresby Projection system: Datum: WGS 1984

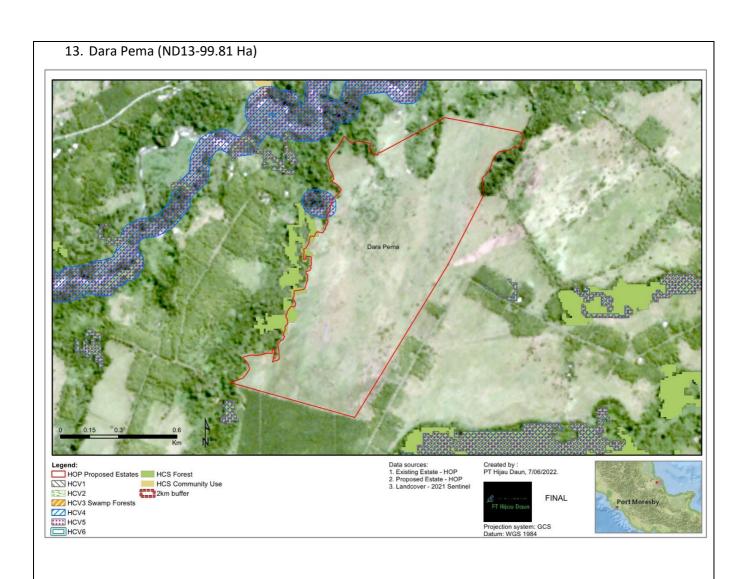
9. Pupu (ND09-55.11 Ha) Legend: HOP Proposed Estates HCS Forest HCS Community Use HCV2 HCV3 Swamp Forests HCV4 HCV5 HCV6 Data sources: 1. Existing Estate - HOP 2. Proposed Estate - HOP 3. Landcover - 2021 Sentinel FINAL : GCS

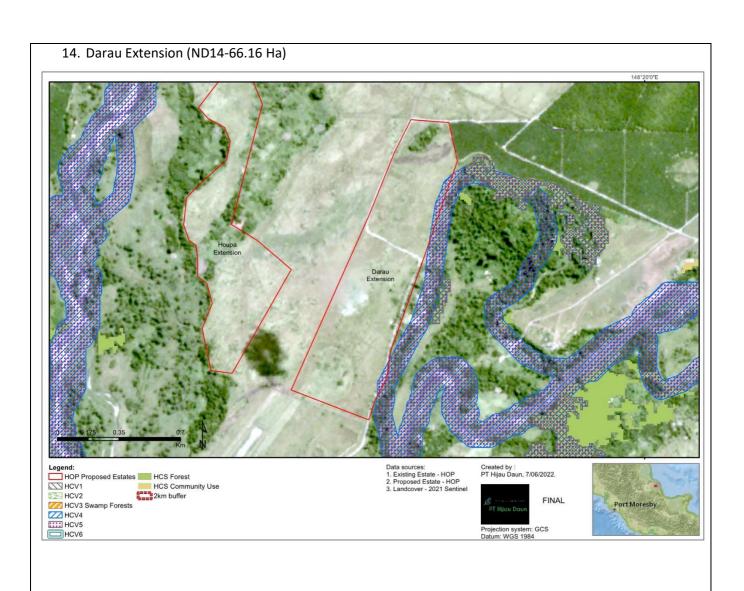


11. Jajama (ND11-54.72 Ha)









15. Javunipa (ND15-23.49 Ha)

Data sources: 1. Existing Estate - HOP 2. Proposed Estate - HOP 3. Landcover - 2021 Sentinel

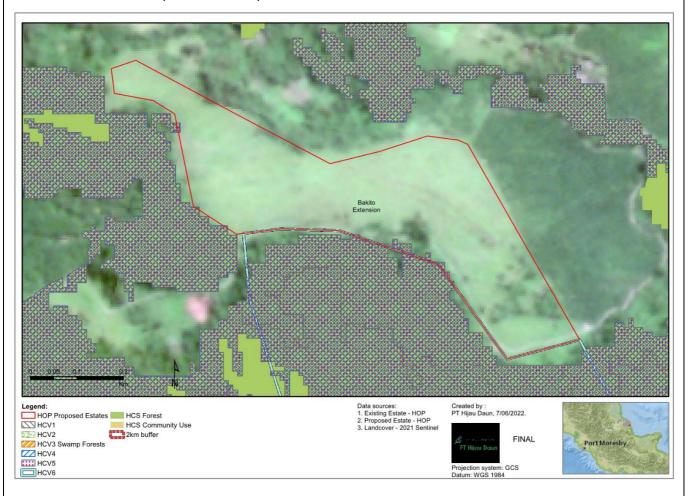
Created by : PT Hijau Daun, 7/06/2022.

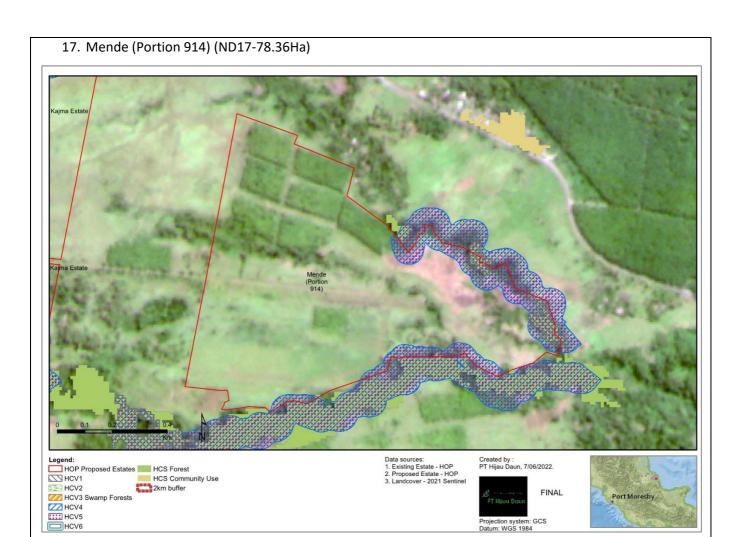
Projection system: GCS Datum: WGS 1984

FINAL

Legend:
HOP Proposed Estates
HCS Forest
HCV1
HCV2
HCV3 Swamp Forests
HCV4
HCV5
HCV5

16. Bakito Extension (ND16-19.47 Ha)



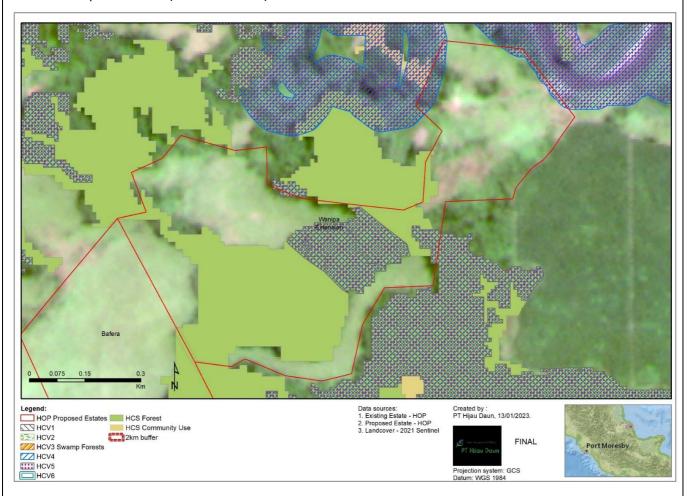


18. Buro (Portion 911) (ND18-36.78 Ha) Kajma Estate HCV1 HCV3 Swamp Forests HCV4 HCV5 HCV6 Data sources: 1. Existing Estate - HOP 2. Proposed Estate - HOP 3. Landcover - 2021 Sentinel Created by : PT Hijau Daun, 7/06/2022. **FINAL**

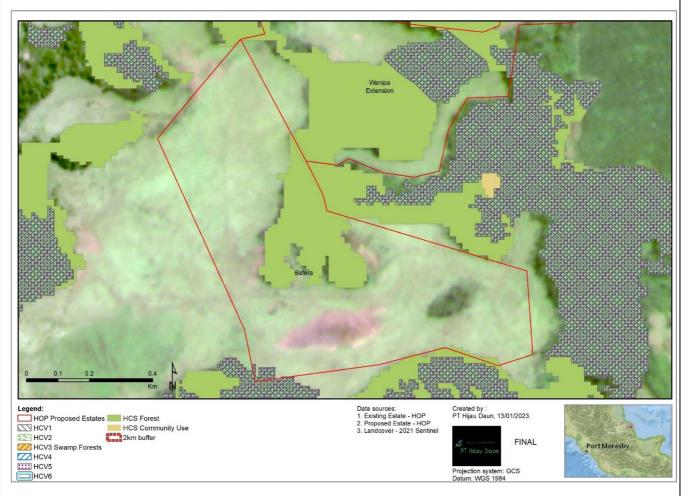
Projection system: GCS Datum: WGS 1984

19. Saura (Portion 919) (ND19-47.41 Ha) Legend: HOP Proposed Estates HCS Forest HCV1 HCV3 Community Use HCV3 Swamp Forests HCV4 HCV5 HCV5 HCV6 Data sources: 1. Existing Estate - HOP 2. Proposed Estate - HOP 3. Landcover - 2021 Sentinel Created by : PT Hijau Daun, 7/06/2022.

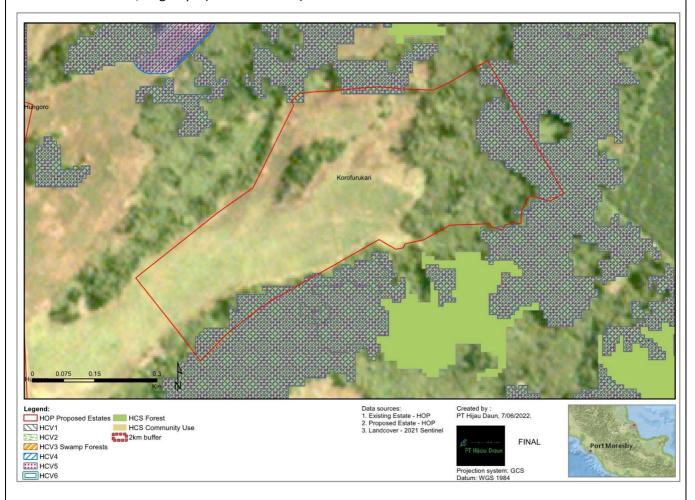
20. Wanipa Extension (ND20-47.16 Ha)



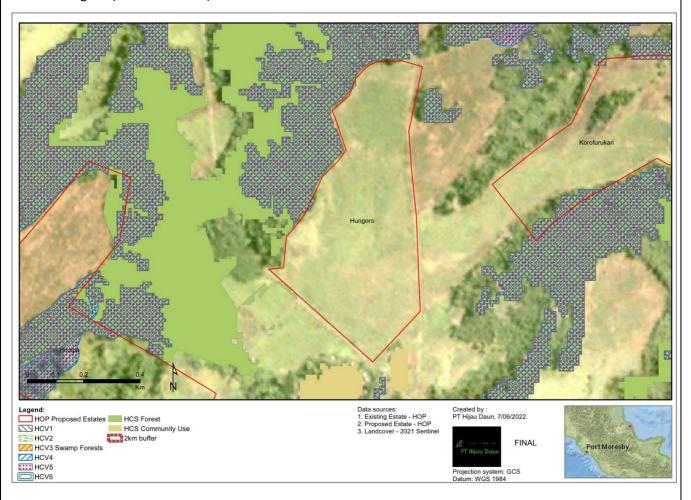
21. Bafera (ND021-56.76 Ha)



22. Korofurukari/Ungurapa (ND22-31.45 Ha)



23. Hungoro (ND23-33.28 Ha)

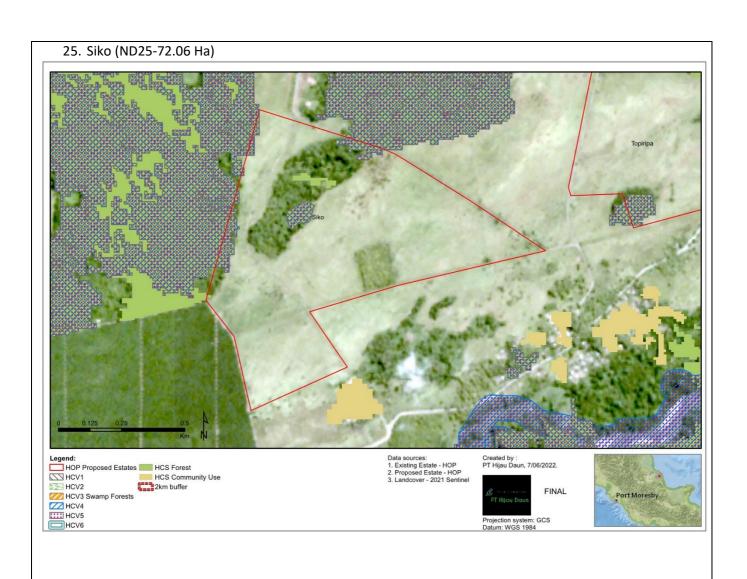


24. Borari (ND24-42.57 Ha) Legend: HOP Proposed Estates HCV1 HCV2 HCV3 Swamp Forests HCV4 HCV5 HCV5 Data sources: 1. Existing Estate - HOP 2. Proposed Estate - HOP 3. Landcover - 2021 Sentinel Created by : PT Hijau Daun, 7/06/2022.

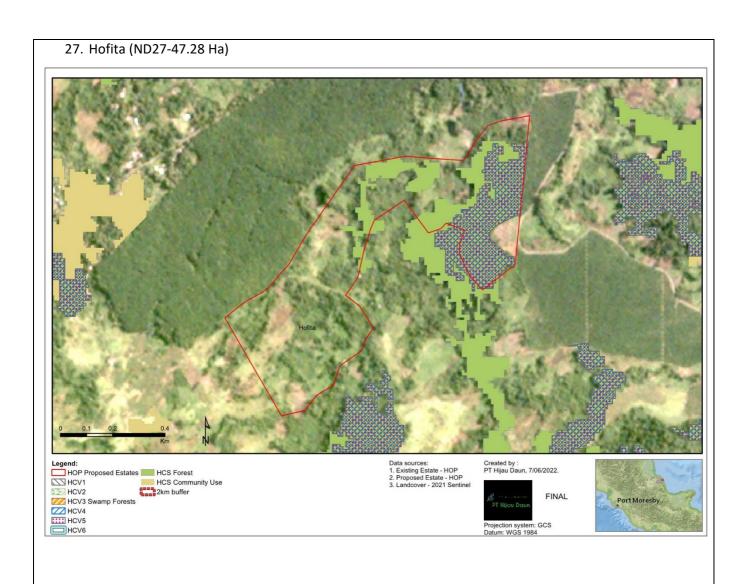
FINAL

Projection system: GCS Datum: WGS 1984

Port Moresby

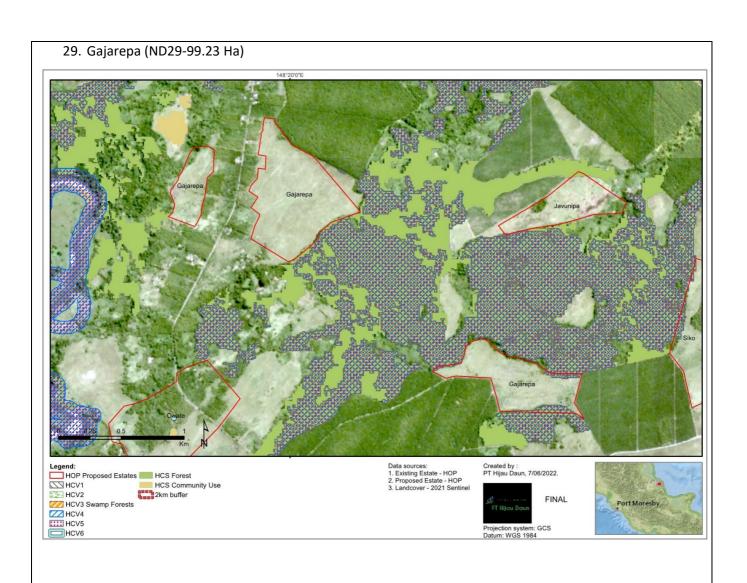


26. Hiroipa (ND26-39.33 Ha) HCV1 HCV3 Swamp Forests HCV4 HCV5 HCV6 Created by : PT Hijau Daun, 7/06/2022. Data sources: 1. Existing Estate - HOP 2. Proposed Estate - HOP 3. Landcover - 2021 Sentinel FINAL Projection system: GCS Datum: WGS 1984



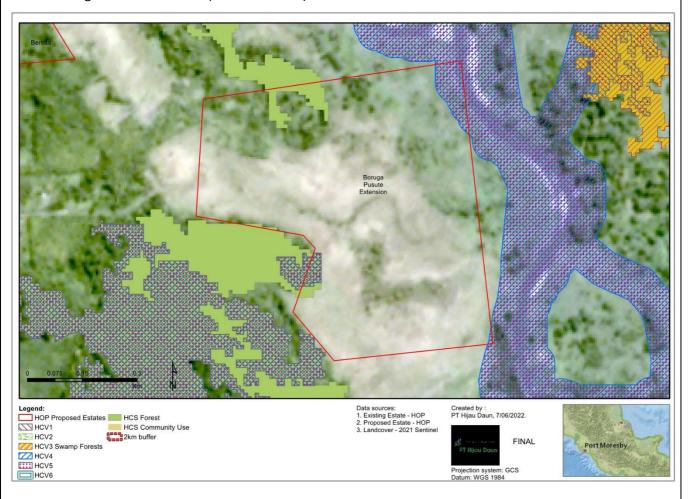
28. Kesiha (ND28-60.50 Ha) Legend: HOP Proposed Estates HCS Forest HCV1 HCV3 Swamp Forests HCV4 HCV4 HCV5 HCV5 Data sources: 1. Existing Estate - HOP 2. Proposed Estate - HOP 3. Landcover - 2021 Sentinel Created by : PT Hijau Daun, 7/06/2022. FINAL

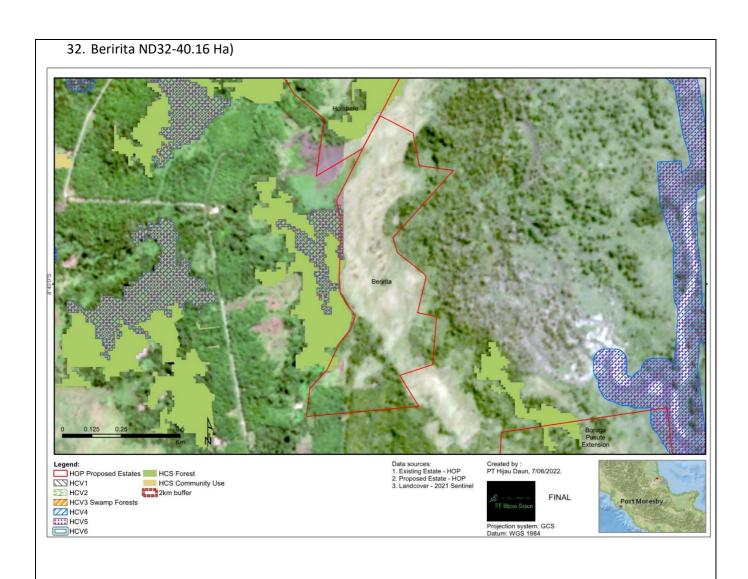
Projection system: GCS Datum: WGS 1984



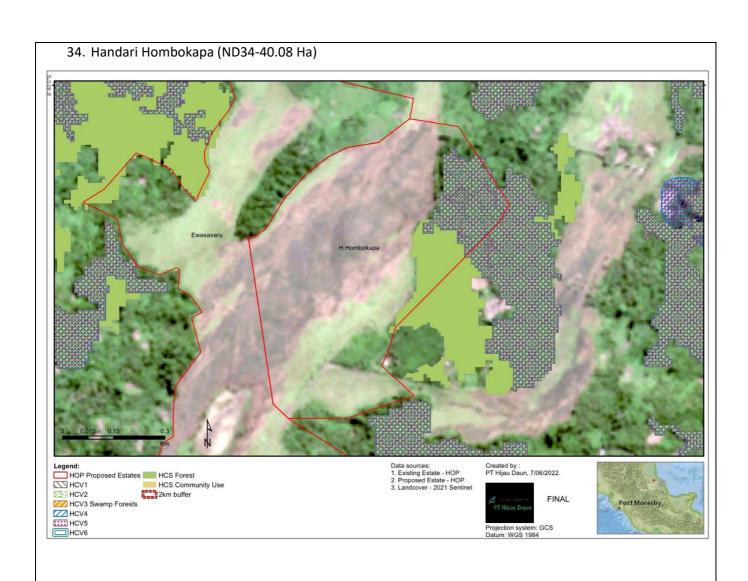
30. Houpa Extension (ND30-47.83 Ha) Legend: HOP Proposed Estates HCS Forest HCV1 HCV2 2km buffer HCV3 Swamp Forests HCV4 HCV5 HCV6 Data sources: 1. Existing Estate - HOP 2. Proposed Estate - HOP 3. Landcover - 2021 Sentinel Created by : PT Hijau Daun, 7/06/2022. FINAL Port Moresby Projection system: GCS Datum: WGS 1984

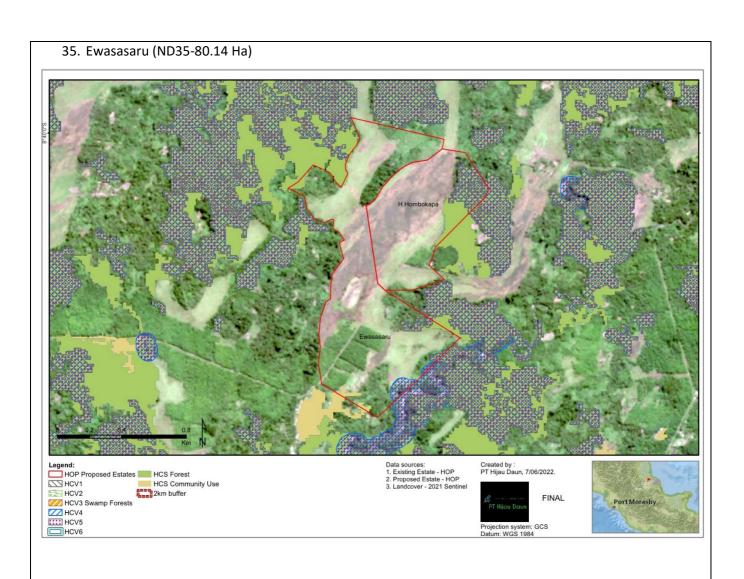
31. Boruga Pusute Extension (ND31-45.83 Ha)





33. Hombare (ND33-45.91 Ha) Legend: HOP Proposed Estates HCV1 HCV2 HCV3 Swamp Forests HCV4 HCV4 HCV5 HCV6 Data sources: 1. Existing Estate - HOP 2. Proposed Estate - HOP 3. Landcover - 2021 Sentinel Created by : PT Hijau Daun, 7/06/2022. HCS Forest HCS Community Use FINAL Port Moresby Projection system: GCS Datum: WGS 1984

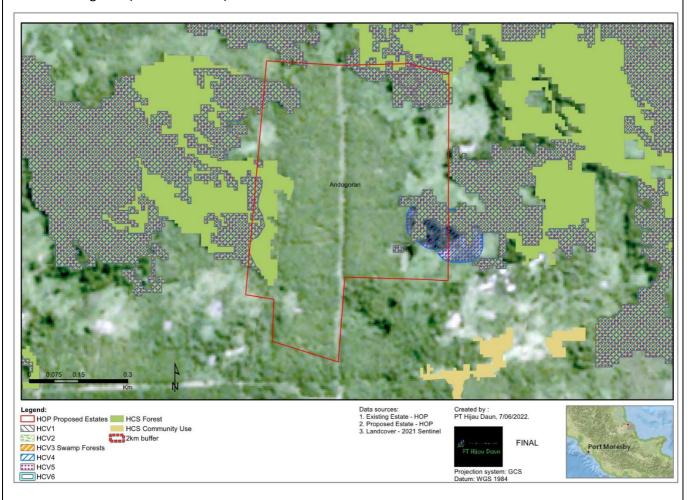


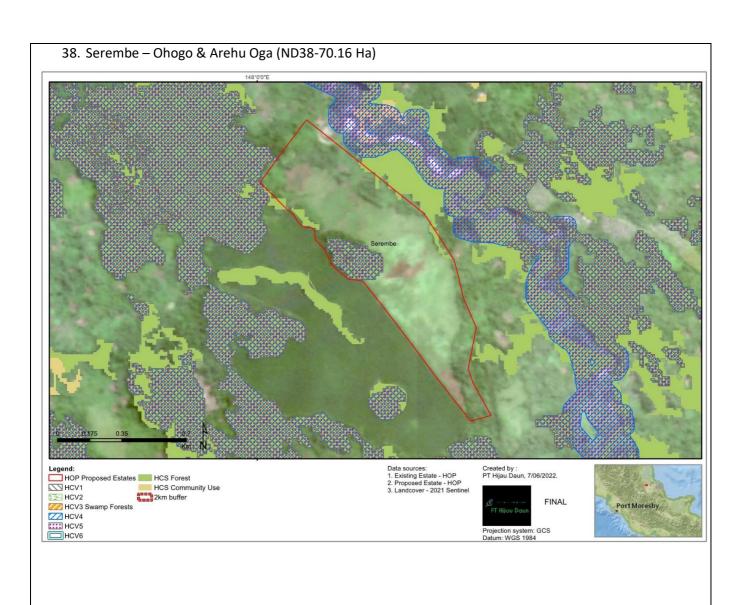


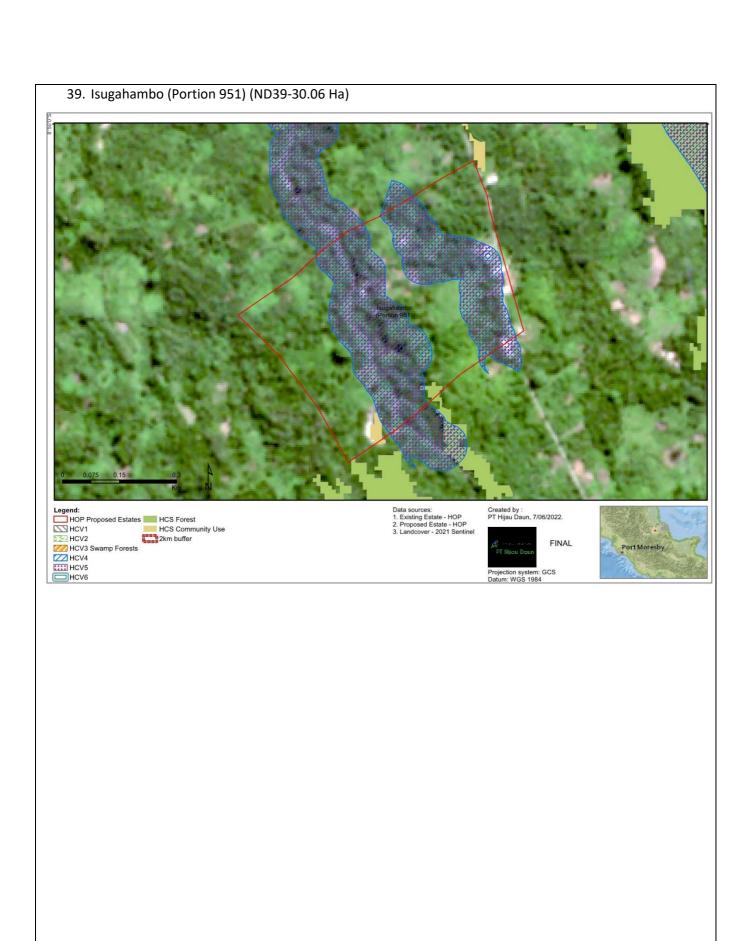
36. Hajojo (ND36-29.89 Ha) HOP Proposed Estates HCS Forest HCV1 HCV2 HCV3 Swamp Forests HCV4 HCV5 HCV5 HCV6 Data sources: 1. Existing Estate - HOP 2. Proposed Estate - HOP 3. Landcover - 2021 Sentinel Port Moresby

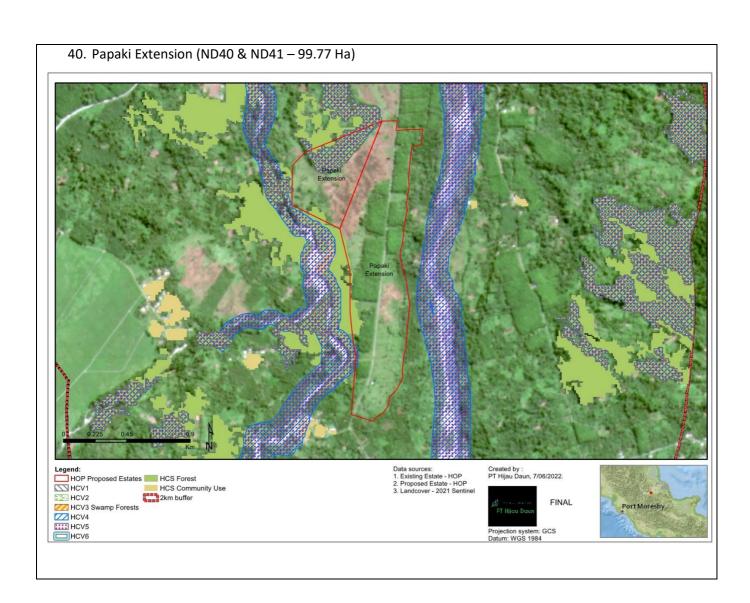
: GCS

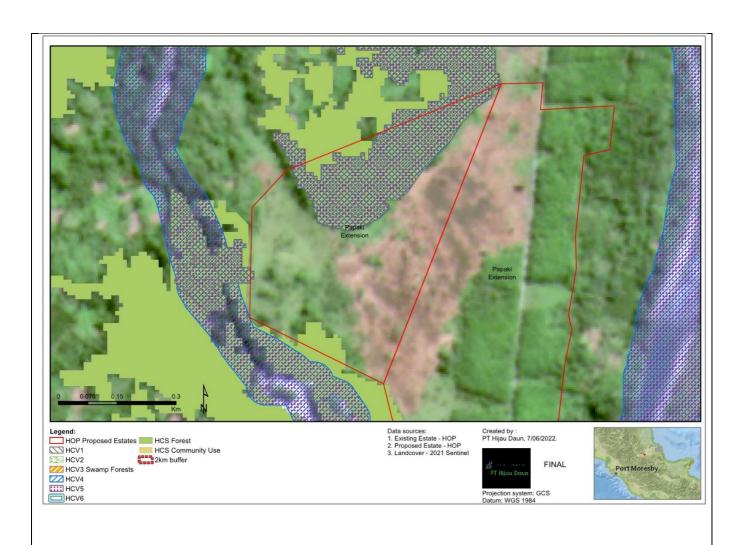
37. Andogorari (ND37-42.67 Ha)



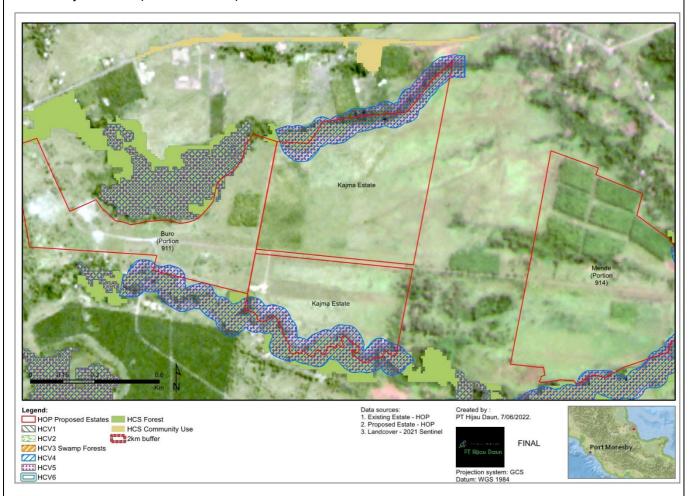








41. Kajma Estate (ND42-76.16 Ha)



Areas and proposed time for new planting

Mini Estate	Area (ha)	Development Year	Development Month
Andogorari	34.65	2025	November
Bafera	48.47	2024	April
Bakito Extension	19.31	2024	April
Beririta	39.61	2026	February
Borari	41.27	2025	May
Boruga Pusute Extension	43.44	2026	January
Buro (Portion 911)	35.51	2024	February
Dara Pema	98.62	2024	October
Darau Extension	64.73	2025	October
Ewasasaru	75.50	2026	May
Gajarepa	96.26	2024	June
H.Hombokapa	33.63	2026	April
Најојо	26.83	2026	June

Haugapa	42.15	2023	October
Hiroipa	29.53	2025	July
Hofita	33.48	2025	August
Hombare	28.00	2026	March
Houembo Kosote	36.89	2026	July
Houpa Extension	47.83	2025	September
Hungoro	33.20	2025	April
Isugahambo (Portion 951)	15.48	2024	November
Jajama	51.49	2024	September
Javunipa	23.10	2024	May
Kajma Estate	64.27	2024	January
Kesiha	49.36	2024	May
Kofureta	27.73	2024	August
Korofurukari	27.63	2025	April
Kovenopa Sambura	53.56	2023	December
Mende (Portion 914)	70.93	2024	February
Owate	55.21	2024	July
Papaki Extension	89.84	2025	January-Feb
Perombata Ext. (Haintapa Clan)	44.16	2023	November
Perombata Ext. (Sorupa Clan)	13.58	2023	November
Portion2	45.46	2025	March
Pupu	32.30	2024	August
Saura (Portion 919)	26.95	2024	March
Serembe-Ohogo	64.02	2025	December
Sifia	27.17	2024	July
Siko	68.87	2025	June
Topiripa Extension	55.59	2023	October
Wanipa Extension	28.14	2024	March
Grand Total	1,843.75		

Note: Please add rows if there are more locations planned. This section is an indicative plan by RSPO members on the land clearing that will be conducted. This information is also useful for growers to monitor their own progress and to plan for their Time-bound Plan for certification.

Summary of the NPP Verification by CB

The auditor conducted on site NPP verification for 4 days (8-11 May 2023) using the Reference Standard: RSPO New Planting Procedure 2021 (NPP 2021) Endorsed by the Board of Governors on 10th June 2021. The verification method used is document verification, interviews with directly affected parties and field visits in the area that will be developed for an oil palm plantation under the "Mini Estate" scheme.

Note: Mini Estate is a scheme developed by NBPOL in which indigenous peoples as land owners receive a monthly land lease and a monthly share of FFB production of 10% of the production value. The "Mini Estate" scheme is fully managed by NBPOL Management.

Field visits and interviews with land owners were carried out in 42 locations that would become "Mini Estate" projects.

Verification is carried out on mandatory indicators as stipulated in Appendix 3 of the RSPO New Planting Procedure 2021, with the following results:

	Indicator	Checklist	Finding
Lega	Requirement(s)		
2.1.	(C) The unit of certification complies with applicable legal requirements.	 a. Is the complete list of legal requirements available? b. When was the list updated? c. Is there evidence of compliance to the applicable legal requirements? 	The company's legal requirement has been established as per document No. HOPRSPO-Doc- 02 (Identification, Access & Evaluation On Compliance To Legal & Other Requirements) version 7.0 dated 01/11/2021. The Sustainability Manager is responsible to ensure that the overall legal aspects and other requirements related to management system have been identified. Method to identify regulation and other requirements may be obtained by accessing websites of certain organizations/institution: • http://www.paclii.org/pg/legis/consol_act/ • https://www.loc.gov/law/help/guide/nations/papua.ph p • http://www.parliament.gov.pg/bills-and-legislation • http://www.fao.org/faolex/country-profiles/general-profile/en/?iso3=PNG • http://www.rspo.org/ • https://www.rainforest-alliance.org • http://www.nbpol.com.pg
2.1.	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.	 a. Is there a map showing location of boundary markers? b. Is there physical presence of boundary markers? c. How does the company maintained its boundary markers? Note to auditor: Ground verification of 	The procedure for marking of new boundaries as per documented in NBPOL - MG 01A: New Development Practices. The objective is to identify the lease boundary of the Project to ensure that all available land is utilized and to ensure no conflicts arise from landowners. Maps of boundary markers are available during audit. Series of boundary surveys have been conducted by the company to ensure all boundaries are clearly marked. Sighted survey map for Dara Pema, SF No. 15923(E). As of todate, there are 12 NPP areas have been completed the boundary survey. As per verified during site visit, no planting has been initiated by the company. Plantings will be done within the legal boundaries.

boundary markers using GPS should be conducted. Priority should be on boundaries with other estates, community areas, protected area and rivers

d. Any planting beyond these legal or authorised boundaries? How was this

verified?

For the proposed mini estates, boundary stones have been verified by auditors:

- 1. ND 15 (-8.756255, 148.353126)
- 2. ND 03 (-8.746457, 148.360836)
- 3. ND 05 (-8.698777, 148.321156)
- 4. ND 29 (-8.757328, 148.327039)

Development Planning

- 3.3. (C) Standard 1 Operating Procedures (SOPs) for the unit of certification are in place.
- a. Are the SOPs for mills and plantation documented?
- b. Are the SOPs appropriate and adequately cover all estate and mill processes and activities? Provide examples of **SOPs** established in the estate and mill.
- c. Are the SOPs dated and approved by the management?
- d. Is a copy of the latest version of the SOP available on site and is

SOPs have been developed by the management of NBPOL. Sighted copy of SOP such as:

- 1. NBPOL MG 01A: New Development Process, revision no. 1 dated 15/10/2018. It includes procedures for boundary establishment, determination of topography, road and drainage alignment, buffer zone establishment, etc.
- 2. MG 01B Replant Practices, Revision 8, dated 23/10/2018.
- 3. NBPOL EI MG 02: Oil Palm Nursery Practices, revision 8 dated 23/10/2018. It includes procedures such as site selection & preparation, irrigation, main nursery establishment, planting germinated seed, Pre-nursery culling, etc.
- 4. NBPOL EI MG 03: Pesticide Practices, Revision 8 dated 23/10/2018.
- 5. NBPOL EI MG 04: Upkeep practices, revision 7 dated 23/10/2018. It includes procedures for weeding, roads/bridges maintenance, soil conservation, Boundary marking, Palm removal (thinning), Pruning, sanitation, Pest & Disease, etc.
- 6. NBPOL EI MG 05: harvesting Practices, revision 8, dated 24/10/2018. It is for the Harvesting, Collection and Organising of FFB and Loose fruit for transportation to the mills consistent with standards intended under RSPO Principles & Criteria.
- 7. NBPOL EI MG 14: Compound upkeep, revision 7 dated 25/10/2018.

	1	T	
3.3.	Mechanism to check consistent implementatio n of procedures is in place.	it documented in an appropriate language? e. Are the SOPs made available at the appropriate location accessible by the workers? f. Is there evidence that SOPs are implemented and understood by workers? a. What are the mechanisms established to check consistent implementation of procedures in the unit of certification? b. Are the	8. NBPOL – EMP –MG21: Lands & Mini Estate Guidelines, Land Acquisition Practices, version 3, June 2014. The company is conducting annual audit quarterly to ensure its implementation of the procedures are in place. The latest internal audit sighted for Sangara Estate was on 28/09/2022 by Esther Wafiware, Sylvester Dira and Stephanie Pokowas. During this audit, there were 14 findings identified during this audit for correcting. All the issues have been corrected by the estate management and has been reviewed by SQM Manager on 08/10/2022.
4.5. 7	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 domain), except in cases of	mechanisms implemented? a. Is there any new land acquired after 15/11/201 8 for plantation s and mills? b. Have the local communiti es consented and/or compensat ed prior to acquisition	A total of 42 blocks of lands to be developed by NBPOL with a total area of 2256.54 hectares. All the communities involved have written to NBPOL and formally requested development of their land. Series of FPIC meetings have been held with all the communities where the whole development process was explained including all the company policies and procedures. Sighted minutes of meeting: 1. 03/05/2021, proposed estate: Hiroipa (39.33 ha) signed by the representative Clan of Javiripa. 2. 08/03/2021, proposed estate: Siko (72.06 ha) signed by representative Clan of Topiripa and Hougapa. 3. 08/06/2020, proposed estate: Kajma (76.16 ha) signed by representative, Mr. Justo Raepa.

4.5.	smallholders benefitting from agrarian reform or anti- drug programmes	of the land?	 4. 14/10/2020, proposed estate: Wanimpa (47.16 ha) signed by representative from clan Wanipa. 5. 14/10/2020, proposed estate: Korofurukari (31.45 ha) signed by representative from Clan Ungurapa. 6. 11/06/2020, proposed estate: Darau – Extension (66.16 ha) signed by representative from Clan Hougapa. 7. 03/06/2020, proposed estate: Papaki - extension (99.77 ha) signed by representative from Clan Afurafu. All the local communities will be compensated as per reference to "Direct Benefits to Landowners: stated in NBPOL – EMP – MG21: Lands & Mini Estate Guidelines Land Acquisition Practices. NBPOL will pay rental to owners based on planted hectares and FFB Royalties (paid monthly in arrears), calculated as a percentage of the value of the crop harvested from the Mini Estate for the month. Official agreement will be established between the company and land owners once the NPP is approved. As of the date of meeting with the land owners, they have already signed a "Preliminary Agreement" for the development of customary land into oil palm mini estate signed by the chief (land owners) for each proposed mini estate. Copy of the agreement is kept by the chief and evident during the site verification. FPIC procedures are contained in NBPOL document "MG 21 Land"
8	are not acquired in areas inhabited by communities in voluntary isolation		Acquisition Practices". This describes the process for the company to develop mini-estates. These mini-estates rely on "leasing" land and not actually acquiring it. The landowners have a good understanding of the requirements and benefits of development.
			Primarily, it involves assisting the villagers / clans to form an ILG (Incorporated Land Group) which gives the clan a legal entity to be able to lease land to NBPOL. The process of formation of an ILG mirrors the FPIC process, ensuring that all the members of the ILG are informed and agreed to the scheme. An ILG can only lease land, it cannot sell the land. Therefore, the community maintains their land rights and cannot result in landlessness.
Cont	inuous Improven	nent	
3.2.	(C) The action plan for continuous improvement is implemented, based on	a. Is there any community in voluntary isolation being identified? b. Is there any new land	The action plan has been identified as per report on Social and Environmental Impact Assessment of Proposed New Development Areas at Higaturu Oil Palms. Example management plan for potential environmental impacts:

of the main social and environmental impacts and opportunities of the unit of certification.

with communities in voluntary isolation? Note to auditor: There should be direct verification of above with the local communities

- 1. Conduct a freshwater fish survey before site preparation within the oil palm footprint area and devise a management plan for the fishery in general.
- 2. Demarcation of buffer zones
- 3. Enrich species diversity in the buffer zones and ensure their interconnectivity.
- 4. Use machinery that is in good working order so that noise level and hydrocarbon spillage are minimized.
- 5. Ensure proper design, construction and maintenance of roads, drains, bridges and culverts.
- 6. Ensure proper application of agrochemicals by appropriately trained and equipped personnel.

Management plan for potential socio-economic aspects such as:

- 1. Conduct RSPO awareness in each prospective ILG community.
- 2. Verify that all clan members are kept informed of agreement negotiations.
- 3. Evaluate increases in land rental and FFB royalty rates that would lead to improved socio-economic welfare in each ILG community.
- 4. Ensure priority for employment and contracts is given to each ILG community.

Mapping

- (C) Maps of an 4.4. 3 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)
- a. Is there a map of the extent of legal, customary or user rights? Is this map of appropriate scale?

b. Was the map

- produced through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities?
- c. Are the maps accepted by the relevant communities?

Based on document verification, it shows that the unit of certification has shown proof of making maps of the blocks of oil palm planting plans (Smallholder Scheme) for each (42 locations) and currently the mapping and installation of boundary markers has been completed for 12 locations, the results of the installation of boundary markers HGU is stated in the document "SURVEY OF PORTION" with a scale of 1:4000. The document explains how many boundary stakes have been installed, the land owner, the land area and the coordinates of the land.

For the proposed mini estates, boundary stones have been verified by auditors:

- 5. ND 15 (-8.756255, 148.353126)
- 6. ND 03 (-8.746457, 148.360836)
- 7. ND 05 (-8.698777, 148.321156)
- 8. ND 29 (-8.757328, 148.327039)

Forms of land ownership in PNG can be divided into 2, namely "State Land" and "Customary Land".

"Customary Land" is customary land owned by each clan.

Note to auditor: Actual ground verification showing the accuracy of the dispute map should be conducted

"Land Estate" is state land that has been given management rights to citizens for a period of 99 years, for example:

- a. Agricultural Lease Under Section 56 Document, Volume 29 Folio 70549 (Portion 911), dated 25 October 1976 with an area of 73.7 Ha which was given to the Kombega Clan. The document is accompanied by a map with a scale of 1:15,000.
- b. Document Agricultural Lease Under Section 87, Volume 20 Folio 039 (Portion 912), dated 17 August 2012 with an area of 76.5 Ha which was given to Kajma Estate. The document is accompanied by a map with a scale of 1:15,000

Based on a field visit to "State Land" which will be participating in the "Mini Estate" program, it shows that all of the land has been marked with "Cement Stakes".

The "Mini Estate" project is a project that is offered to the community clans that are around the company and have expressed their consent to participate in the project in the "Preliminary Agreement" document. Based on interviews with all land owners stated that they had signed the agreement and received copies of the document. The "Mini Estate" project will be fully managed by NBPOL management. The agreement for the "Mini Estate" project is signed by the head of the clan concerned as a member representative. Physical boundaries in the field before participatory measurements are taken in the form of natural boundaries of rivers, ditches, plants or footpaths. At the time of making the detailed map, each block had to set up land ownership boundaries which were carried out in a participatory manner between the two land-owning clans.

Based on interviews with the clan leaders of the landowners, it was stated that during the preparation of the 'Mini Estate' plan map, the landowner or other adjacent landowners were involved, including during the determination of the plantation block plan.

Social and Environmental Impact Assessment (SEIA)

3.4. (C) In new 1 plantings or operations including mills, an independent SEIA, undertaken through a

1) Is there any new plantings or operations, or expanding existing ones by the company? If Yes, what is the size of the

As per the report, "Scheme Smallholders are referred as Mini – Estate" which is a common NBPOL HOP's internal understanding regardless of crops that produced by a smallholder.

Based on the report, a total of 42 community base groups.

participatory methodology involving the affected stakeholders and including the impacts of any smallholder/o utgrower scheme, is documented.

new development i.e. new planting area or operation or expansion?

- 2) Has an independent social and environmental impact assessment (SEIA) been documented for the new plantings or operations (i.e. existing planting)?
- 3) Are the impact assessments prepared by accredited independent experts?
- 4) Are all environmental and social impact (positive and negative) adequately identified?
- 5) Is the SEIA undertaken based on the scope of operation?
- 6) Is the SEIA undertaken in a participatory manner, including the relevant affected stakeholders?
- 7) Is the SEIA assessment include and as a minimum:

Based on interviews with Clan Chairman's and members during on-site NPP verification, all the clans have ample land that for other cash crop uses or be it as grassland.

The breakdown of the smallholders is:

- 5 State Lease Holders
- 1 Freehold Landlord
- 36 Customary Landowning

According to the Sustainability Manager, during the HCV assessment (which after the SEIA) there is a change in the number of scheme smallholders as 1/6 of the State Lease Holder with land area of 199.80Ha has withdrawn from the assessment.

Therefore, the total scheme smallholders involving in the NPP as at NPP Verification dated 08/05/2023 was 42 with combined land of 2263.80 Ha.

There is a 3rd party's (Narua Lovai – Freelance Environmental Management Consultant) "Report on Social and Environmental Impact Assessment of Proposed New Development Area at Higaturu Oil Palms".

Based on the report, the assessment was carried out from 08/08/21 - 24/09/2021 and the final report dated on 09/02/2022. The assessment covers a total land area of 2,463.60Ha was done against RSPO NPP 2021 requirements.

The Sustainability Manager had shared the profile of the assessor, Narua Lovai:

- Bachelor of Science Degree in Applied Chemistry from PNG University of Technology,
- Master of Engineering Science Degree in Hydrology and Water Resources Management from University of Adelaide, Australia
- Diploma in Professional Writing and Editing from Australian College QED, Sydney, Australia.

He was formally employed by the PNG Department of Environment and Conservation, South Pacific Brewery and the International Waters Programme (Secretariat of the Pacific Regional Environment Programme).

Since mid-October 2006, he has been working as a Freelance **Environment Management Consultant.**

Some of the clients he has served as a consultant includes:

- South Pacific Applied Geosciences Commission,
- PNG Sustainable Development Limited, Oil Search Limited,
- ExxonMobil PNG Limited,

- i. Assessment of the impacts of all major planned activities, including land clearing, planting, replanting, pesticide and fertiliser use, mill operations, roads, drainage and irrigation systems and other infrastructure
- ii. Assessment of the impacts on HCVs, biodiversity and RTE species, including beyond concession boundaries and any measures for the conservation and/or enhancement of these
- iii. Assessment of potential effects on adjacent natural ecosystems of planned developments, including whether development or expansion will increase pressure on

- British Standards International,
- New Britain Palm Oil Limited
- PNG Power Limited.

His expertise and skills include strategic planning, outcomesbased project management, policy formulation and revision, waste management and cleaner technology, water pollution assessment and mitigation, integrated catchment management, biophysical environment impact assessment, socio-economic impact assessment, environmental compliance and audit monitoring, stakeholder engagement for community development, and professional writing and editing.

Since 2007 he has undertaken various RSPO related Social and Environment Impact Assessments (SEIA) plus certification audits for Hargy Oil Palm Limited in West New Britain Province (WNBP) as well as RSPO related SEIA, Social Impact Assessment (SIA) plus certification audits for NBPOL operations in WNBP, Ramu (Morobe Province), Poliamba (New Ireland Province), Milne Bay Estates (Milne Bay Province) and Higaturu (Northern Province).

As per page 65 of 156 of the SEIA report, point 8.1 refers to 10 types of management of potential environmental impacts and point 8.2 on 7 types of management of potential socioeconomic aspects.

These are connected to Section 7.0 on page 61/156 that relates to aspects & potential impacts register that corresponding to 4 phases of scheme smallholder development & operations. As for the pre-planting site evaluation and land use agreement negotiation seen the focus on ensuring FPIC (as per RSPO and ILG Act).

This was again cross checked in page 149/156 (Appendix 5.0) for social and environmental monitoring and management plans that were matching.

Higaturu Oil Palms complex is an RSPO certified member of NBPOL group. Higaturu complex consists of 2 palm oil mills, 11 estates (6 own estates and 5 scheme smallholders = miniestates), a centralize nursery and a bulking station that with 40KM distance away. All the 42 community base groups that relates to NPP were engaged.

Aside from the 42 community base groups (since it is not declared as mini-estate), the SEIA report gathered information through meetings & interview, literature searches, stakeholders, surrounding local community / village leaders / members of ward development committees' engagements as well as officials from Oro Provincial Administration and Adventist

nearby natural ecosystems

- iv. Identification οf watercourses and wetlands and assessment of potential effects on hydrology and land subsidence of planned developments. Measures should be planned and implemented to maintain the quantity, quality and access to water and land resources v. Baseline soil
- surveys and topographic information, including the identification of steep terrain, marginal and fragile soils, areas prone to erosion, degradation, subsidence, and flooding
- vi. Analysis of type of land to be used (forest, degraded forest, peatlands, cleared land, etc.)

vii. Assessment of land

Development and Relief Agency. The attendance list and interview registers seen attached to the assessment report.

In page 58/156, among the impacts outlined were roads to remote communities, HOP workers selling pesticides to local villagers, sewage effluent discharge with improper treatment system, safe & reliable water supply system, pollution the mouth of rivers by agrochemicals, EFB causes flies, dust pollution due to plantation roads may cause traffic hazard during dry season and etc.

Integrated High Conservation Value / High Carbon Stock Approach Assessment Report by PT. Hijau Daun Konsultan, indicates the assessment started in Sept 2021 and ended in 10/8/2022. The assessment report page 356 – 359 indicates the impacts of HCV 1, HCV 4 and HCV 6. As per the report, the total Conservation Area (HCV or HCS or community use) 487.45ha.

The statement in the report (page 37) that "The assessor was able to verify that the communities had been informed of the proposed project by NBPOL and that they had understood the location, scale and objectives of the proposed development and conservation and had given their consent to the HCV-HCSA assessment" was verified with all the interviewed Clan Chairmans / Chief / Secretary found the answers was "Yes".

Summary of Basic Needs for each village / clan and the score of importance of the natural ecosystem as a source of basic needs sighted in page 193 of the assessment report. This was established based on responses to direct questions posed to the village groups at the proposed development areas.

During the interview with all 42 community groups on the statement per the HCV report page 330, "Where community customary use (HCV 5) and HCS forest overlap, such as in Non-Timber Forest Product (NTFP) areas, they will be proposed for conservation with continued customary use", they agreed and mentioned this was clarified earlier by the assessor and the company.

This was cross verified with NBPOL HOP Land Manager that the management had agreed to preserve what terms to be customary use by the landowners at proposed areas.

As per the assessment report page 205, there is a natural waterway flowing in the proposed area (Isugahambo – ND 39). The river called "Auga River" is used for washing and laundry.

Based on site visit during NPP verification at the proposed area, aside of unmapped small streams / waterways / creeks that could have major impacts on water quality, the main rivers in the landscape are the Kumusi River and the Mamba River

ownership and user rights

- viii. Assessmen t of current land use patterns
- ix. Assessment of impacts on people's amenity
- x. Assess impacts on employment, employment opportunities or from changes of employment terms
- xi. A cost-benefit analysis on social aspects
- xii. Assessment of potential social impacts on surrounding communities of a plantation, including an analysis of potential effects on livelihoods, and differential effects on women versus men, ethnic communities, and migrant versus longterm residents

xiii. Assessmen t of salient risk of human rights violations

xiv. Assessmen t of the

(starting at Kokoda). The control measures are mentioned in page 164.

Locations of soil and topography observation points are reported in "New Planting Procedure - Summary of Assessments" page 75 & 76. Based on the HCV report, in Popondetta generally there are slightly dissected volcanic plains north-east of Mt. Lamington with black, sandy volcanic soils under grassland. This was cross checked with SEIA report page 28 mentioned "Most the soils in the area are unweathered sandy volcanic soils with black topsoils. They are deep, loose, coarse sands to loamy sands with sandy and loam topsoils".

Aside in HCV assessment report seen the control measure on clearing of buffers and steep areas will result in erosion and stream pollution.

In page 272 of HCV assessment report and page 80 of the New Planting Procedure - Summary of Assessments, it mentioned no peat was found in any other assessment areas by the biodiversity team.

Based on HCV assessment report and site visit during NPP verification found the proposed development areas are grasslands / scrub (which tended to be ex-garden) that are only used for hunting bandicoots. There are some patches of forest within the proposed area (1 km from ND 12 & ND 42, 2 km from ND 19 and 2.7 km from ND 41 Extension) which are recommended by assessors to be set aside from development.

As per RSPO NPP 2021 Summary of Assessments page 87, a table explains on analysis of the landcover 2005 – 2021 shows that there has been very little change over of forest area during this period and no conversion to oil palm.

The lands under customary ownership are areas that the clans have ear-marked for new oil palm development. Land ownership is attributable to the respective clan / community groups.

The breakdown of the smallholders is:

- 5 State Lease Holders
- 1 Freehold Landlord
- 36 Customary Landowning (none of the Clan received official land title from local land department. Customary land ownership and land boundaries are determined through traditional mediation processes used by customary landowners).

In HCV assessment report page 113 – 120 stated on Land use and development trends.

impacts on all dimensions of food and water security including the right to adequate food, and monitoring food and water security for affected communities

- xv. Assessment of activities which may impact air quality or generate significant **GHG** emissions
- 8) Are there schemed smallholders/o utgrowers involved?
- 9) Are they considered and involved in the whole process of the SEIA?
- 10) What are the main impacts affecting these smallholders/o utgrowers?
- 11) Is the assessment involved consultation with the affected parties? Who are the affected parties?
- 12) What are the main findings of the assessment?

As per in the SEIA report page 45-46, mentioned "Within the areas marked for ME development from Oro Bay to Papaki, the vegetation is primarily grassland only or grassland with forest patches, and grassland with regenerating secondary regrowth and VOP blocks which in many instances will be integrated into the ME set-up".

The statement in SEIA page 50 "The alternative land uses for the ME areas by the landowners are to venture into more VOPs, expand cultivation of other cash crops such as cocoa, rubber and vanilla, or maintain the status quo, i.e., not proceed with the ME development", was cross verified with all interviewed Clan Chairmans / Chief / Secretary and visit to their proposed land found to yes.

In page 179 & 180, mentioned on the local people's basic needs. While the project will bring cash into the economy and will effectively reduce the reliance on traditional forms of attaining basic needs,

Based on the RSPO Summary Assessment Report page 28, mentioned during site preparation and planting, employment opportunities of unskilled workers should be given to the ILG community and nearby villages.

Sampled the draft copy of the "Agreement for Development of Customary Land between Kula Palm Oil Limited – Higaturu and Sauha Sigopapa Clan the Customary landowners, the Clause 16 (2) mentioning the "Developer shall give preference to the Owners in the awarding of Small Contracts for the development of the land provided...."

As per the SEIA report, page 65 on bullet 8.2 refers to potential social-economics aspects. Example, evaluate increase in land rental and FFB royalty rates that would lead to improved socioeconomic welfare in each ILG community.

Sighted the SEIA report, page 149 on social and environmental monitoring and management plan. Examples such as Clan boundaries disputed by neighboring Clans, disputes over eligibility for membership may arise, members of ILG community not given the opportunity to hear from existing Mini-Estate landowners and etc.

As per SEIA report page 50 mentioned, the clans are unable to meet the initial expenses associated with ILG registration and the land title application process, so they are using the ME partnership with NBPOL HOP to cover these costs. This was verified through interview with Clan Chief / Chairman / Secretary found to be true.

The interview results also prove that the social life of the landowners in the proposed land area will be improved as the 13) Are the findings of the SEIA found any negative impacts? If yes, is there a management and monitoring plan developed to mitigate the negative impacts?

selling price of FFB compared to other crops is much higher and eventually will be a cost-benefit for them.

Aside the clan members feel the high cost of utilities including water supply

and electricity will be likely reduced with the conversion of their grassland into mini-estate.

Some of the clan members agree that they may make an effort to provide better education to their children, better or grand ritual celebrations, access to better health facilities and possible access to better telecommunication facilities.

As per interview with clan members and observations during visit to proposed land area, the livelihood activities of community groups involved are consisted of subsistence agriculture, hunting, and fishing.

Based on the geographical and social culture of the visited sites, it is unlikely that livelihood choices and patterns will change greatly in the near future.

The are possibilities some of the clans who lives in very remote area may have limited gardening area following development who are dependent entirely on the forest for their livelihood and do not want it developed for oil palm.

In the SEIA report page 36 mentioned "The womenfolk do most of the work in the gardens, carry water containers, gather firewood, cook, and attend to the small children. Men on the other hand, prepare new garden sites, build and repair houses and take care of cash crops. Most villagers pointed out that there is

currently a positive noticeable trend whereby more men are assisting their wives in subsistence garden maintenance, firewood collection, water cartage, and looking after young children". This was cross check with clan female members, at which some agrees and some not.

In page 34 of HCV report mentioned on the SDP – NBPOL HOP's Human Right Policies. During interview with clan members, the verifier asks examples of human rights violations which they were able to tell 1 or 2.

Since the company has not planned their detail programs for briefing on the Human Right Policies, therefore the verifiers understand the respond from clan members. The company will engage the community groups upon signing the Development Agreement.

Most villagers cultivate a range of cash crops, and everyone have two or more. All families have subsistence food gardens in which they grow various carbohydrates, vegetables, and fruits.

Some families raise chicken and pigs as animal protein sources. Most of the pigs and chickens are consumed during custom ceremonies and feasts.

It is evident that the produce grown in food gardens is critical to the welfare, health and survival of the local communities potentially affected by the proposed development.

Based on the proposed land area, some clans mentioned the sago starch serves as the dominant source of carbohydrate. Aside, there are other garden foods crops are planted, such as sweet potato, banana, coconut, pumpkin and variety of green vegetables.

As per stated in SEIA, EFB that use for boiler furnace sometimes causes smoke emission that need adequate measure to control. In page 154, the environmental aspect identified the waste management could cause emission of offensive smoke and odour.

In Table 29 of RSPO NPP Summary of Assessment indicates the results of the greenhouse gas emissions scenario modelling. Field emissions and sinks assume average growth for oil palms, used by large scale operations. Data derived from RSPO GHG Calculator (RSPO-PRO-T04-003 V2.0 ENG).

Yes, there are 42 Scheme Smallholders (proposed mini-estates) involved in the HCV/HCS and SEIA assessments. This was verified against the attendance list and through interview with clan members.

Yes, the whole assessment of HCV and SEIA is done for the Mini Estate (Scheme Smallholders).

Examples of potential impacts are resistance by some landowners against the proposal to enter Mini Estates development venture with HOP, land use agreement not understood by the landowners, allegation over water contamination due to use of agrochemicals by HOP and noise nuisance during pre-development / land clearing.

The SEIA sighted interviewed all the 43 Clans and this was cross verified with all the 42 community base groups visited during NPP verification.

For SEIA

I. Collaborative assistance for improved community water supply and sanitation.

			II. Better partnership to improve delivery of education and health services.
			III. Assistance with financial literacy and small business management training IV. Better management of buffer zone.
			V. Enhanced support towards QABB recovery on the Popondetta Plains.
			As mentioned in page 156 of HCV report,
			"The company's plans (no conversion had taken place at the time of the assessment) to convert, after sub-lease agreements had been signed. The communities' agreement with this plan had been noted along with a number of issues of concern (which would be entered into the management and monitoring recommendations). An example was re-establishment of the riparian buffers and setting aside areas for birds in Portion 2.
			The SEIA report mentioned on the Social and Environmental Monitoring and Management Plan in page 149 to 156. It covers the activities such as expression of interest from land owners, notification to CEPA, land boundary survey, study of ILG Genealogy, construction of access roads, land clearing, fertilizer application, pest control and etc.
3.4.	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.	a. Is the SEIA management and monitoring plan developed with participation of affected stakeholders? b. Is the above plan implemented? c. Is there any documented record to outline the plan on mitigation, implementation and monitoring according to the SEIA report?	As per the Sustainability Manager, some of the Social and Environmental Monitoring and Management Plan in page 149 to 156 been already incorporated into the existing management programs. The others which only connecting to the proposed area will be included upon starting of the project.
3.4.	(C) The social and environmental management	a. Is the review of the management and monitoring	As per interview with Sustainability Manager, it is the company policy to review the management and monitoring plan of SEIA on annual basis or as and when there is a need. This is also part of the exercise before the external audit of RSPO P&C audits.
	and	plan conducted	

monitoring plan is implemented, reviewed and updated regularly in a participatory way.

- regularly? How frequent was the review?
- b. Was the review done internally or externally?.
- c. Is the plan updated as necessary (i.e. in cases where the review has concluded that changes should be made to current practices)? d. Is there
- evidence that the review has been done in a participatory way?
- e. When was the last reviewed done?
- f. Was the process recorded/docu mented?

The review is conducted by the Sustainability members with Sustainability Manager who then reports of the review output with HOP General Manager.

As for the proposed area, there is no review done for new inclusions that in reference to the land development. It will be reviewed and documented upon signing of the Development Agreement.

The initial review is expected by 3rd quarter of 2023. As per Sustainability Manager, all the group communities will be engaged.

Human Rights

- 4.1. The unit of 2 certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.
- a. Is there mercenaries and paramilitaries use in the operations of the company? If yes, what is the scope of their work?
- b. Does the interviews with the relevant stakeholders (workers and local communities) or online search reveal use of violence by/in the unit of certification?

NBPOL does not instigate violence or use any form of harassment including the use of mercenaries and paramilitaries in their operations. For security purposes, they are using their own employee to guard and control their assets and workers.

The company has established Human Rights Policy (HOP-RSPO-Pol-04) to focus on three core areas:

- Free, Prior and Informed Consent
- Right to Health
- Rights to Workers

The policy was signed by the General Manager, Vijou Vergis in October 2022.

As per interview with the stakeholders, they have confirmed that no violence is practiced among the NBPOL employees.

	1		1 .	1
			c. If there are	
			reported cases	
			or interviews	
			reveal used of	
			violence by/in	
			the unit of	
			certification,	
			please verify	
			with relevent	
			stakeholders.	
	4.2.	(C) The	a. Is there a	The company has established "Complaints & Grievance
	1	mutually	system in place	Procedure", version 13, dated 26/10/2022. The procedure has
		agreed	to deal with	been explained to all affected parties through series of FPIC
		system, open	complaints and	meetings conducted by the company.
		to all affected	grievances for	Complaints are lodged using the incident report SHEQ001. This
		parties,	all affected	procedure respects the anonymity and protects complainant
		resolves	parties?	where requested.
		disputes in an	b. Does the	where requested.
		effective,	system allow	
		timely and	for the	If the grievance requires another department to address, then
		appropriate	complainant to	the SHEQ001 form will be registered by Sustainability Social
		manner,	agree on the	Officer and forwarded to the respective Supervisor, Line
		ensuring	process of the	Managers, Head of Department or the General Manager for
		anonymity of	grievance	action on the complain or grievance.
		complainants,	mechanism?	action on the complain of grievance.
		HRD,	c. Does the	
		community	system allow	As per stated in the procedure, the complainant has the option
		spokespersons	for the	of seeking access to independent legal and technical advice and
		and	protection of	or choosing individuals or groups to support them and or to act
		whistleblower	the anonymity	as observers as well as the option of third party mediator.
		s, where	of the	as observers as well as the option of third party mediator.
		requested,	complainant if	
		without risk of	· ·	
		reprisal or	d. How is a	
		intimidation	complaint or	
		and follows	grievance	
		the RSPO	investigated,	
		policy on	addressed and	
		respect for	resolved?	
		HRD	e. Is the system	
			effective to	
			ensure	
			complaints or	
			grievances are	
			addressed or	
			resolved in an	
			effective, timely	
			and appropriate	
			manner?	
			f. Is there a non-	
			retaliation or	
Ш			retailation of	

Susta	ninable Developm	non-reprisal policy that protects complainants or whistle-blowers? g. Does the complainant know that his/her anonymity will be protected if requested? h. Where a resolution is not found mutually, is there a process for complaints to be brought to the next level e.g. RSPO Complaints System?	
4.3.	Contributions to community development that are based on the results of consultation with local communities are demonstrated	a. Have the local development needs been identified in consultation with local communities? b. Are there any contributions made to the local development? If yes, are they in accordance with what have been agreed during the consultation?	Local contributions have been actively made by the company to its local stakeholders. Most of the contributions made were according to requests received from the surroundings. Sighted "Master Request & Response Register 2022". Example contribution made such as: Date Request received: 06/04/2022 Request from: Baptist Church- School Mr. Beggai Description: Requesting for Water Pods 1000L for hand washing Action taken: Pod was supplied Action by: Benjamin Osa SQM HOD Date Request received: 03/08/2022 Request from: Higaturu Dart Association Description: Requesting HOP to assist with Sponsorship Action taken: Matter referred to HRM Action by: Benjamin Osa HOD SQM Date Request received: 07/09/2022

	1		[a]
			Request from: Sangara Technical High School Manager: Mr. James Viambu
			Description: Requesting for Gravel loads
			Action taken: Gravels were provided by Road Fleet Section
			Action by: Richard Taudevan
Free.	l . Prior and Inform	ed Consent (FPIC)	
1	(C) Documents showing legal ownership or	a. Are there documents showing legal	As per the document verification, all the 5 – State Lease Holders and 1 – Freehold Landlord has the legal ownership documents. As for the 36 – Customary Landowners has no legal documents.
	ownership or lease, or authorised	showing legal ownership or lease of the	As for the 36 – Customary Landowners has no legal documents. The state lease land title will be having to be formally replaced before sub-lease discussions with HOP can proceed.
	use of customary	land available? (e.g. land titles,	As mentioned in page 40 of SEIA, "HOP and each customary land-owning clan will sign a Development Agreement to enable
	land authorised by	lease documents) b. Is there	registration of the respective ILG as per the ILG (2009 amendment) Act and issuance of a customary land title under
	customary landowners through a	legitimate claim	the Customary land Registration (2009 amendment) Act prior to land lease negotiations between the two parties".
	Free, Prior and Informed	stakeholders? c. Has the claim	The above statement was checked with interviewed Clan representatives found; they want the proposed area to be start
	Consent (FPIC) process.	been identified and assessed	operation the soonest as they are waiting for the confirmation since 2019. This will enable them to secure an official land
	Documents related to the	through the FPIC process?	document.
	history of land tenure and	d. Are there documents	Based on site observation, typically, boundaries are based on physical features such a rivers or ridges, in other places marked out by particular species of plants (a variety of cordyline is a
	the actual legal or customary use	showing history of land tenure available? (e.g.	common marker).
	of the land are available	legal documents	
		showing land status change,	
		SIA and EIA reports, HCV assessment	
		reports) e. Who was the	
		previous land owner of the	
		unit of certification?	
4.4.	There is	a. Is there	The proposed project is yet to start and is expected to
6	evidence that implementatio	evidence that the	commence after this NPP verification. However, the company has done the FPIC process separately from SEIA assessment.
	n of	implementation	When interview with clan members, found the FPIC process
	agreements	of agreements	was done with involvement from every community groups and
	negotiated	negotiated	they agreed it was done ethically and transparently.
	through FPIC	through FPIC is	

	is annually reviewed in consultation with affected parties	annually reviewed in consultation with affected parties? b. When was the reviewed conducted? Note to auditor: interviews with affected parties to be conducted to verify the occurrence of the process.	
4.5.	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available	 a. What are the documents showing identification of legal, customary and user rights? b. Does the SEIA include the identification and assessment of legal, customary and user rights of the area? 	As mentioned in page 40 of SEIA, "HOP and each customary land-owning clan will sign a Development Agreement to enable registration of the respective ILG as per the ILG (2009 amendment) Act and issuance of a customary land title under the Customary land Registration (2009 amendment) Act prior to land lease negotiations between the two parties". The above statement was checked with interviewed Clan representatives found; they want the proposed area to be start operation the soonest as they are waiting for the confirmation since 2019. This will enable them to secure an official land document.
4.5.	(C) FPIC is obtained for all oil palm development through a comprehensiv e process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative	a. Is comprehensive FPIC process carried out for all oil palm development including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions?	HOP has complied with FPIC since its initial response to the expressions of interest lodged by the landowners. A copy of the FPIC meetings that have been held with all the communities where the whole development process was explained including all the company's policies relating to this assessment were explained. There is a sign-off letter and meeting attendance register attached to each document. The villages had been visited several times by NBPOL staff. NBPOL had assisted the villages to form an ILG, which was either complete or in the final steps. Initial FPIC was done by the company. See Appendix Error! Reference source not found. where the company explained many things to the community about the development process, including the HCV assessment. Which would involve a social and biodiversity assessment. By signing this document the landowners agreed for the process to go ahead and allow

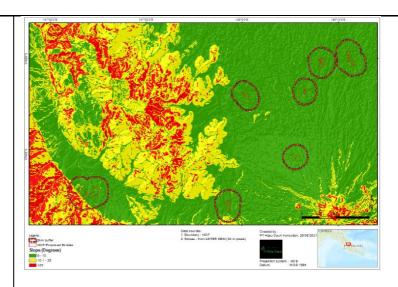
institutions, b. What evidences people to come onto their land and undertake social work in with all the are available to their villages. All the landowners had signed these documents. relevant support (a)? An interview during the full assessment was held with the information affected communities. The assessor asked about the and information that had been provided about the survey by documents NBPOL. The assessor noted that the community had an made adequate understanding of the assessment process and available, with understood that the area may be converted to OP. The assessor option of asked these parties whether the assessment team had the resourced community's consent to start working on their lands and access to engaging with them. independent The customary landowners are always mindful of their need to advice preserve some of their land for subsistence gardening and through a other domestic needs. NBPOL and the assessors have ensured documented, this is also conveyed in the FPIC meeting with the communities. long-term and two-way process of consultation and negotiation 4.5. Evidence is a. Has it been As per Land Manager, the company never requested any available that communicated landowners to lease their land to company. It is the land owners affected local to the through "Expression of Interest" will submit their request. This peoples community that was checked with all the 42 community groups found they are understand they have the aware on the process. they have the right to say 'no' right to say to the proposed Since this NPP process at the beginning stage, all the 42 'no' to development at community members has signed the Preliminary Agreement operations all stages, up with HOP. A copy of the agreement was verified during site planned on until the verification. their lands agreement with before and company is signed? What during initial The Preliminary Agreement for development of customary land discussions, evidence was into oil palm mini estate has information on name of the during the sighted? project, name of the clan, the area to be lease, their concern to stage of b. Is there HOP to feasibly explore and develop their customary land into information evidence to mini-estate, landowner's agreement to vacate their land and gathering and demonstrate grant full unrestricted access of land to the developer and it's associated that the agent freely and carry out any preliminary works, to facilitate consent/agree consultations, preparation of all necessary documents required for the during ment has been application. Finally, the consent from clan members for the given prior to negotiations, proposal. and up until new an agreement operations? with the unit c. Is the of certification negotiated is signed and agreements ratified by made without these local coercion and peoples. entered into

	Negotiated agreements should be non-coercive and entered into voluntarily and carried out prior to new operations	voluntarily and carried out prior to new operations? If yes, what documents to support this?	
4.7.	(C) A mutually agreed procedure for identifying people entitled to compensation is in place	a. Does the company have a documented system or procedure in place to identify people and/or community groups entitled to compensation? b. Is the procedure agreed by the affected parties?	grievances by aggrieved parties.
	ted Stakeholders		
4.6.	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation , is in place	a. Is there documented system in place for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation? b. Is the documented system agreed by the affected parties? Note to auditor: There should be direct verification of	

		above with the affected parties	
4.8.	Where there are or have been disputes, proof of legal acquisition of title and	a. Are there, or have there been any land disputes?a. Note to auditor: Due diligence	Based on interview with Sustainability Manager, land owners and grievance log book, there is no evidence of land disputes registered. Sighted the HCV/HCS assessment has done the due diligence (page 35) on demonstrated legal right over or permission to explore the area of interest.
	evidence that mutually agreed compensation has been made to all people who held legal,	should be conducted on the management to provide evidence that there has been no historical or	Sighted the grievance log book with no indication of land dispute reported by stakeholders.
	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	current land dispute b. If there are or have been disputes, are there: - Documents to proof legal acquisition? - Records of FPIC process including resolution of the dispute? c. If there has been acquisition involving compensation, are there: - Records that fair compensatio n has been	This is (proposed project) is the 4 th batch of mini estate. The previous (3 rd Badge) of the NPP was in 2016 involved 31 community groups. There is no outstanding payment by the company. During interview with 42 community groups, found they are aware the company has no outstanding payment within their clan or others.
		provided and accepted by parties involved? - Records that all affected parties are consulted and	

		ronno combo d	
		represented ? - Documents of negotiations /discussion available? Note to auditor: There should be direct verification of above with the affected parties	
4.8.	(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	a. Does the company have cases of land conflict? (i.e. preventing the company from operating normally) b. If the company has cases of conflict, are records of the following available? - Status of land conflict - SOP/ mechanism for conflict resolution - Implementat ion of SOP/mechanism - Acceptance of the procedures by all parties - Records of conflict resolution	Based on interview with Sustainability Manager, the company (NBPOL HOP) has not received, nor the Mini Estate land owners been raised issue on land disputes. This was cross checked with land owners during interview found no land disputes with company. NBPOL HOP has a procedure on Lands & Mini Estate Guidelines - Land Acquisition Practices (NBPOL – EMP –MG21), page 25 refers to handling of land owner grievances. Based on interview with Sustainability Manager, land owners and grievance log book, there is no evidence of land disputes registered.
4.8.	Where there is evidence of acquisition through dispossession or forced	a. Is there evidence that the land has been acquired through dispossession	As per interviewed with all 42 community base groups during this NPP Verification found, the land owners still holding their land until the Development Agreement sign by both parties. This was cross verified with Sustainability Manager found tally of information.

П					
	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)	or forced abandonment of customary and user rights prior to the current operations? b. Are there any parties who can establish legitimate rights on the land? c. If so, are the requirements in 4.4.2, 4.4.3 and 4.4.4 been met?	All the 42 community base groups mentioned their Clan Chief has the legitimate rights on the land upon consulting with clan members. Based on interviews with the community, the landowner stated that NBPOL did not practice coercion or intimidation for the "Mini Estate" development plan. NBPOL has shown evidence of the implementation of FPIC on the "Mini Estate" development plan for all customary community groups who own land and this was also confirmed when the auditor conducted interviews with the 42 community groups.		
Envir	Environmental				
7.5. 1	(C) Maps identifying marginal and fragile soils, including steep terrain, are available.	Are there maps identifying marginal and fragile soils, including steep terrain and peat soils?	Based on document verification, it shows that NBPOL has conducted a soil suitability study including identifying marginal soil types, fragile soils and areas with steep slopes (Steep Terrain). Based on the verification of the document "Soil Suitability and Topographic Survey of Higaturu Oil Palms - Papua New Guinea, New Britain Palm Oil Limited (2022)" stated that no marginal and fragile soil was found. All of the studied land is suitable for planting oil palm,		
7.5. 3	There is no new planting of oil palm on steep terrain.	Is there new plantings on steep terrain?	although it requires special treatment, such as intensive fertilization. Based on the document, there are no indications of land with steep slopes (Steep Terrain) or peat soil types (Peat Land). Based on the verification of the document "Integrated High Conservation Value / High Carbon Stock Approach Assessment Report, Higaturu Oil Palms — Papua New Guinea, New Britain Palm Oil Limited, 2022 explains that there is no land classification with a slope above 25% as shown below:		



All land that will be used as a "Mini Estate" project has been well mapped including its slope class.

Based on interviews with all landowners as well as visits to 42 prospective "Mini Estate" project locations, it was shown that these lands have a flat slope, except for areas along river banks which show that some locations have quite steep slopes. NBPOL has designated these areas as HCV areas that will not be cleared for oil palm plantation development (See Figure below).





The degree of slope in the riparian buffer.



The condition of the riparian buffer zone in Block ND39 (Isugahambo)



Block ND 21 (Bafera)



Block ND 21 (Bafera)

7.6. (C) To 1 demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.

- a. Has the unit fo certification submitted NPP to RSPO? If no, how does the unit conducted its soil maps or soil surveys identifying the marginal and fragile soil, including the steep terrain?
- b. Are the soil maps or soil surveys taken into account in plans and operations of the estates to ensure long term suitability of land for palm oil cultivation?
- c. Are the maps used to identify areas that are inappropriate for planting?
- d. Are there any new planting on unsuitable area

NBPOL has conducted a land suitability study in 2022. The study was carried out in collaboration with PT Hijau Daun where field verification was carried out in February 2022 for 3 weeks and the results were set forth in the document "Soil Suitability and Topographic Survey, Higaturu Oil Palms - Papua New Guinea, New Britain Palm Oil Limited".

The purpose of the soil suitability and topographic survey is to enable NBPOL to comply with RSPO requirements, which necessitate all new oil palm developments to undertake the aforementioned survey prior to development (the overall purpose is to comply with RSPO new planting procedures). This is done to ensure that planting is not undertaken on fragile soils or unsuitable terrain in the assessment area. Fragile soils or unsuitable terrain must be identified and mapped prior to development to ensure that land clearing and planting does not take place on these areas. Standardized, open, transparent and credible methods are used to identify these areas. The soil suitability and topographic survey includes the following steps:

- Compiling and analyzing available primary and secondary data relevant to identifying fragile soils or unsuitable terrain in a pre-assessment.
- Undertaking a field survey to verify the data that has already been obtained.

The results of the soil suitability and topographic survey studies are as follows:

Criteria	Description	Observation
Fragile	A soil that is	Based on interviews
Soils	susceptible to	with the community,
	degradation	there was no mention

П	and the same of		/	C 11 11
	as identify in the soil map?		(reduction in fertility) when disturbed. A soil is particularly fragile if the degradation rapidly leads to an unacceptably low level of fertility or if it is irreversible using economically feasible management inputs.	of soils that met these criteria. Indeed agricultural studies have labelled these soils as some of the best in PNG.
		Marginal Soils	A soil that is unlikely to produce acceptable economic returns for the proposed crop at reasonable projections of crop value and costs of amelioration. Degraded soils are not marginal soils if their amelioration and resulting productivity is cost effective.	In all the community interviews, it was mentioned that the area could be comprehensively cropped and there was no mention of areas or soil types that were routinely avoided because of low yields for Oil Palm. Note that the grassland areas have been routinely burnt which has led to very low levels of soil carbon. This means that large amounts of particularly nitrogen fertiliser will be needed. These can be seen as degraded soils not marginal soils.
		Peat	A soil with cumulative organic layer(s) comprising more than half of the upper 80 cm or 100 cm of the soil surface containing 35% or more of organic matter (35% or more Loss on Ignition) or 18% or more organic carbon.	There was no peat observed in the area nor was it mapped in any of the soil data sets.
		Steep soils	Soils over 25 degrees	No areas over 25 degrees were noted.

7.6.	Soil surveys	a. Are the areas	Based on a study of the Soil Suitability and Topographic Survey					
3	and	where planting	documents, it shows that there is a classification of					
	topographic	was carried out	Depositional landforms (Fluvial - recent plains – 22) that require					
	information	require	good drainage. In detail, the types of landform in the NPP area					
	guide the	drainage or	are as follow	rs:				
	planning of	irrigation?						
	drainage and	b. If yes, is there						
	irrigation	topographic	Landform	Landform	Landform	Description		
	systems,roads	information and	Number	group	name			
	and other	soil surveys to	3	Depositional	Beach	Beach ridge		
	infrastructure	guide the		landforms	Ridge	complexes consist of		
		planning of			complexes	long parallel ridges		
		drainage and			and beach	and swales often		
		irrigation			plains	extending for		
		system?				several tens of		
		c. Is the				kilometres along the		
		topographic				coast. The relief is		
		information and				mostly 2-3 m and		
		best practices				gradually decreases		
		taken into				inland. If there is no		
		consideration				discernible relief the		
		during the development of				complex is called a		
		roads and				beach plain. Beach		
		infrastructure?				ridge complexes are		
		illiastructure:				formed by sand		
						transported by lung-		
						shore drift and are		
						most common		
						where there is		
						strong wave		
						transport. Beach		
						ridge complexes		
						often occur at the		
						mouths of estuaries		
						along the south		
						coast and are the		
						most favoured areas		
						of human		
						settlement. They		
						are, however, also		
						common along the		
						north coast where their material is		
						generally coarser,		
						reflecting the greater sediment		
						supply from the		
						inland rivers due to		
						the continuous		
						uplift of the area.		
						apilit of the area.		

13	Depositional landforms (recent plains)	Composite alluvial plains	Complex alluvial plains or basins consisting of a central flat to gently undulating meander floodplain with meandering channels, low discontinuous levees, meander scrolls and oxbows, which merge into poorly drained flanking back plains an back swamps and/or higher well drained terraces.
21	Depositional landforms	Back plains	Fossil beach ridges are those which are some distance inland and separated from the present beach ridge complexes. In the strict sense, of course, only the very first beach ridge of a complex is active and all the successively older beach ridges behind it are inactive. However, because of the very limited extent of these land forms it was not possible to map this kind of detail. Relict beach ridges are clear indicators for seaward extension of the land.
22	Depositional landforms (Fluvial - recent plains)	Back swamps	Extensive marshy semi-permanently to permanently inundated depressed areas of floodplains with drainage impounded or impeded by a

			central levee or meander plain. These freshwater swamps are maintained wherever land gradients and drainage outlets are inadequate to disperse the rain and run-on water. The depth of standing water and duration and depth of flooding is highly variable throughout PNG and depends entirely on local conditions.
25	Depositional landforms (Fluvial - recent plains)	Braided Flood- plains or Bar Plains	Braided flood-plains are distinctly different from the plains mentioned above. They are characterized by numerous braiding shallow channels, sand bars, and mud bars which are constantly shifting. The channels are very shallow and unnavigable by even small craft. The gradients are high (0.5-3 %) even for larger rivers and large quantities of sediment are moved rapidly during flood.
31	Depositional landforms (Fluvial - recent plains)	Relict fans	Relict fans are basically similar to relict plains but form a segment of a cone with its apex at the point where the stream leaves the mountains. They consist of irregularly bedded sediments

			of silt, clay, and gravel unconformably overlying planed surfaces of older beds. Fans are typical features of tectonically active areas. The relief gives an approximate indication of the degree of dissection. Undissected fans have a relief of 0-10 m, while the dissected fans have a relief of 10-30 m or 30 - 100 m.
32	Volcanic landforms (Fans and footslopes)	Little dissected volcanic footslopes and volcano- alluvial fans	A variety of undissected to little dissected landforms generally surrounding young or recently active volcanoes and including partially dissected extensive coalescing volcanoalluvial fans of slightly concave profile. Fans are dissected by shallow, frequently steep sided radiating valleys separated by either long low ridges with accordant crests or by undulation plains at lower altitudes and slopes.
33	Volcanic landforms (Fans and footslopes)	Dissected volcanic footslopes and volcano-alluvial fans	Dissected volcanic footslopes and former volcano-alluvial fans of slightly concave profile, formed of intercalated fluvial, lahric (mudflow) and

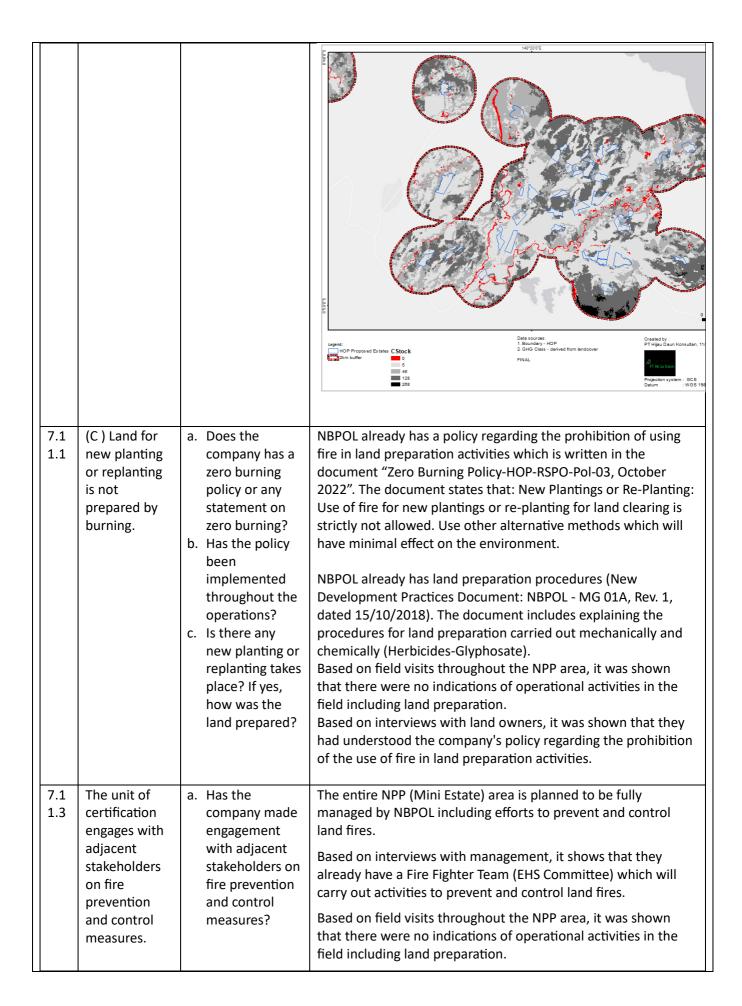
			nuee (avalanche) deposits with superficial ash. On the flanks of major volcanoes, they are dissected by numerous radiating streams to form a pattern of long, radianting or sub- parallel ridges and narrow, steep sided valleys.
35	Volcanic landforms (Fans and footslopes)	Volcano- alluvial plains	Actively forming very low angle volcanic plains which may take various forms.
51	Erosional landforms (mountains and hills)	Mountains or hills with weak or no structural control	Mountains and hills of high to very high relief (greater than 100m) with weak or no structural control, steep escarpments and narrow sharp crested ridges separated by V-shaped valleys with steep river gradients.
			Mountains and hills with weak or no structural control on soft fine -grained sedimentary rocks such as marl, mudstone and siltstone. They are characterized by a very dense dissection pattern and highly irregular slopes with great variability in slope steepness because of frequent slumping and
			intense gullying. Slopes can vary from

			50º at slump headwalls to a few degrees at slump toes. Weathering is mostly shallow and immature.
			There were no indications of steep slopes in the entire NPP area, so there was only one recommendation published in the study, namely that cover crop planting (Mucuna spp) should be carried out immediately after land clearing activities in preparation for planting oil palm.
			Based on interviews with all landowners as well as visits to all prospective locations for the "Mini Estate" project, it was shown that these lands have a flat slope, except for areas along river banks which show that some locations have quite steep slopes. NBPOL has designated these areas as HCV areas where land clearing will not be carried out for the development of oil palm plantations.
7.7.	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.	Is there peat in the unit of certification? If yes, please refer to RSPO Peat Audit Guidance for P&C 2018	Based on document reviews as well as interviews with landowners and visits to all samples (42 locations) it shows that there is no indication of the existence of peatlands in the area.
7.1 0.1	(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented,	 a. Are all sources of GHG emissions identified? b. Is the GHG emissions for the unit of certification calculated using the latest version of RSPO 	The NBPOL (NPP Project) has carried out GHG calculations, the results of which are described in the document "Greenhouse Gas Report, Higaturu Oil Palm-Popondette, Papua New Guinew, NBPOL" which will be carried out in 22 January – 13 February 2022. This calculation is carried out in collaboration with PT Hijau Daun with a team of experts who have the following competencies: 1. Jules Crawshaw: Lead of HCV and HCV-HCSA Assessments. Forest Inventory and GIS 2. Jeffery Lawrence: Tree identification expert
	monitored through the Palm GHG calculator and	Palm GHG calculator? c. Are there plans to reduce or minimise the	The preparation of this document refers to the RSPO document (2016) 'RSPO GHG Assessment Procedure for New Development', (Rev: 3, October).

The GHG calculation is based on the RSPO-PRO-T04-003 V3.0 publicly GHG emissions? Is this publicly reported. ENG document. reported? The document is also equipped with a GHG Management Plan d. Are the plans which outlines plans to minimize the impact of Greenhouse being Gases as follows: implemented? NPP NBPOL GHG Management Plan Was there any changes? Is it Estimat justified? Proposed edEnhance Time-**Paramet** e. Is there a er to be ment / Locat Measure Frequ Respons frame system in place monitor ibility for Mitigatio ion ment ency to monitor complet ed n emission of Measures ion of greenhouse task gases from Mitigate **Implemen** NBP Once Sustaina Complet **GIS Map** estate net GHG tation of OL bility ed (plantation) and emissio the HCV Estat Manage and HCSA mill operations? associat prior to f. Is there regular ed with Field developm reporting of the oil palm ent. No Manage monitoring cultivati conversio n of HCV on outcomes? areas NBP **Enhance** ΑII Quart Sustaina Followin **GIS Map** ment of HCV/HCS OL bility Field erly Carbon areas Estat Manage Develop inspecti Stocks within the ment е on estates to Field be Manage managed conservat ion areas to allow for carbon sequestra tion. **Ensuring** there is no access to settlers into the area. **Awarenes** NBP **GIS Map** Sustaina Followin Annua s to be OL Field bility carried Estat inspecti Manage Develop out on on ment the Field importan ce of Manage maintaini ng **HCV/HCS** areas identified. This is to

				ensure no encroach ment. Monthly monitorin g of all conservat ion areas. Enforcem ent of incursions (ie/garde ning) through consultati on with communit ies, removal of crops / settlers.	NBP OL Estat e	Field Inspecti ons	Annua I	Sustaina bility Manage r Field Manage r	Followin g Develop ment	
7.1 0.2	(C) Starting 2014, the carbon stock of the proposed development area and major potential	a. Has the unit of certification identified and estimated carbon stock of the proposed development area? b. If yes, what are	GHG calculation, the results of which are described in the document "Greenhouse Gas Report, Higaturu Oil Palm-Popondette, Papua New Guinew, NBPOL" which will be						the - e arbon	
	sources of emissions that	the potential major sources	Land cov	er class		Area (ha)	M	ean Carb	on stock (tC/ha)	
	may result directly from	of emissions that may result		d Forest	1	.03.55			128	
	the development	directly from the	Grasslan			528.47			5	
	are estimated	development?	Shrub la	nd	7	15.06			46	
	and a plan to minimise	c. Is there a plan to minimise the	Other			3.06			0	
	them prepared and	emissions? If yes, is the plan	Not to b			5.26			0	
	implemented	following the	Grand To	otal	2,4	55.39				
	(following the RSPO GHG Assessment Procedure for New	RSPO GHG Assessment Procedure for New Development	Assessment Procedure for New		imarising th mate per la		•	ment are	ea (ha) and Tota	
	Development)	d. Is the plan implemented and monitored?	Land cov	ver class		Area (ha)	Me Carb	ean Cark oon		

		stock	
		(tC/ha)	
Disturbed Forest	103.55	128	13,254
Grassland	1,628.47	5	8,142
Shrub land	715.06	46	32,893
Other	3.06	0	0
Not to be developed	5.26	0	0
Grand Total	2,455.39		54,290
Capital Proposed Enters. C Stock Capital Proposed Enters C Stock Capital Duffer Capi	One source: One source: 2 Ond Cleas - deviced from IFNAL	AS	p ₽ Matorestry
Carbon Stock map – E	ast	Proportion system: OCS Datum WOS	OPP



		h What tung of	Pacod on int	orvious with I	and owners it was s	hown that they						
		b. What type of engagement is agreed?	had understo	ood the comp	and owners, it was s any's policy regardin reparation activities.	g the prohibition						
7.1 2.1	(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or	a. Since November 2005, have any new plantings replaced primary forest, or any area required to maintain or	namely: a. Integ App New was	grated High Co roach Assessm Guinea, New carried out in	ments that are requi onservation Value/Hi nent Report, Higatur Britain Palm Oil Lim collaboration with P e following team me	gh Carbon Stock u Oil Palm-Papua ited". The study 'T Hijau Daun						
	enhance HCVs. Land clearing since 15 November	enhance one or more High Conservation Values (HCVs)?	Name	Assessmen t role	Qualifications	Experience with HCV and HCS / Languages						
	2018 has not damaged HCVs or HCS forests. A historic Land Use Change Analysis (LUCA) is conducted	If yes, was an adequate HCV assessment carried out prior to clearing the land. Is a considered by the land. It is a considered by	If yes, was an adequate HCV assessment carried out prior to clearing the land. b. Has the unit of certification	If yes, was an adequate HCV assessment carried out prior to clearing the land. b. Has the unit of certification	adequate HCV assessment carried out prior to clearing the land. b. Has the unit of certification	adequate HCV assessment carried out prior to clearing the land. b. Has the unit of certification submitted the	adequate HCV assessment carried out prior to clearing the land. b. Has the unit of certification submitted the	adequate HCV assessment carried out prior to clearing the land. b. Has the unit of certification submitted the	Jules Crawsha w	Lead Assessor and Social Team Leader	 B.For.Sc., M.Bus.Sys ALS Fully Licensed Assessor (ALS14006JC) HCS Register Practitioner. 	 PNG, Indonesia , Solomon Is, Myanmar , Malaysia English, Indonesia
	new land and LUCA to RSPO? accordance with the RSPO disclosure form reported any land liability? document. Rahma Rahma Rahma Rahma Rahma Accordance disclosure form reported any land liability? document. Jeffery		Rahmat	GIS Expert ²	 B.For.Sc GIS Expert for HCV assessments throughout Indonesia LUCA Assessments 	IndonesiaEnglish,Indonesian						
		Jeffery Lawrence	Vegetation Expert Forest Inventory	 BSc Degree in Forestry Expert in tree identification FSC experience HCV and HCS experience 	PNGEnglish,Tok Pisin							
		the HCVRN ALS quality review process prior to any land clearing.	Juliana Mohe	Social Expert ³	BSc Degree in Geography and Environment al Science	PNGEnglish,Tok Pisin						

² The GIS Expert did the land cover classification. All the other GIS work was done by the lead assessor who is an HCS Registered Practitioner.

³ The lead assessor, who is an HCS Registered Practitioner, joined the social team.

e. Where HCVs & HCS forests have been identified on the land that is intended for new plantings, have new plantings been planned and managed to best ensure the HCVs & HCS forest identified are maintained and/or enhanced. Note to Auditor: Refer to Interpretation	Lewi Kari	Social Expert	 Experience with social research and social surveys MSST. (2010) in Spatial Information Science Technology from the University of Southern Queensland, Toowoomba, Australia Feasibility Studies Training Masters Degree in 	 PNG English, Tok Pisin PNG English,
of Indicator 7.12.2 and Annex 5	Amick Bradley Gewa	Birds Expert	Science rapid assessments on mammals SEIAs BSC. Biodiversity surveys using focal insect, mammal, birds and plant groups. Ecological research involving	 English, Tok Pisin PNG English, Tok Pisin
	carri deta	ied out for 15 o il the field acti posed Villag	e ed in	gust 2021, in :

ND0	Topiripa	Dobudur	√	10.8.202	6
	Extension	u		1	
NDO 2	Hougapa	Ango	√	10.8.202	30
NDO 3	Perombat a Extension	Ango	√	11.8.202	32
NDO 4	Perombat a Extension	Ango	✓	11.8.202 1	
ND0	Kovenopa Sambura	Soputa	√	11.8.202 1	30
ND0	Owate				
ND0 7	Sefia	Urio	√	11.8.212	2
NDO 8	Kofureta Handiria				
NDO 9	Pupu	Tombata	√	12.8.202	6
ND1 0	Houembo Kosote	Hariko	√	9.8.2021	22
ND1 1	Jajama	Tombata	√	12.8.202 1	2
ND1 2	Portion 2				
ND1	Dara Pema	New Soputa	√	12.8.202 1	15
ND1 4	Darau Extension				
ND1 5	Javunipa	Dobudur u	√	11.8.202 1	2
ND1 6	Bakito Extension	Kararata	√	13.8.202 1	8
ND1 7	Mende (Portion 914)				
ND1 8	Buro (Portion 911)				

ND1 9	Saura (Portion 919)	Sori	√	13.8.202	4
ND2 0	Wanipa Extension				
ND2 1	Bafera				
ND2 2	Korofuruk ari	Ango	√	10.8.202 1	9
ND2	Hungoro	Ango	√	10.8.202 1	15
ND2 4	Borari	Ango	√	10.8.202 1	9
ND2 5	Siko	Dobudur u	1	10.8.202 1	2
ND2 6	Hiroipa	Ango	√	10.8.202 1	9
ND2 7	Hofita	Siremi	√	10.8.202	25
ND2 8	Kesiha	Dobudur u	√	11.8.202 1	10
ND2 9	Gajarepa				
ND3 0	Houpa Extension				
ND3	Boruga Pusute Extension	New Warisota	√	16.8.202	10
ND3 2	Beririta				
ND3	Hombare				
ND3 4	Handari Hombuka pa				
ND3 5	Ewasasar u	Sehoro	√	16.8.202 1	20
ND3 6	Најојоо	Jajau	√	17.8.202 1	22
ND3 7	Andogora ri				

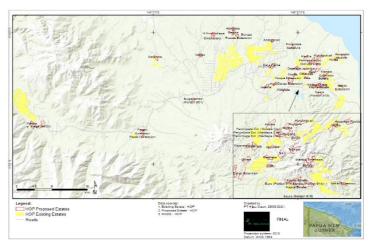
ND3 8	Serembe	Serembe	√	17.8.202 1	19
ND3 9	Isugaham bo (Por 951 LTC)	Handarit uru	✓	18.8.202 1 – site visit	1
				20.8.202 1 - mapping done with estate owner	
ND4 0	Papaki Extension	Papaki	√	18.8.202 1	29
ND4 1	Papaki Extension	Papaki	√	18.8.202 1	29
ND4 2	Biage	Higaturu Office	√	19.8.202 1 – no show by participa nts for meeting – death in communi ty 20.8.202 1 – only mapping done by	1
ND4	Kajma Estate			chairman	

In this activity FPIC was also carried out to explain the aims and objectives of the "Mini Estate" project to be carried out by the company. Based on interviews with the landowners, it was shown that they stated that they had given approval for the plan to develop oil palm plantations by NBPOL on their land and had signed the "Preliminary Agreement" document which contained the approval of the landowners for the project.

In this activity, public consultation was also carried out, consisting of:

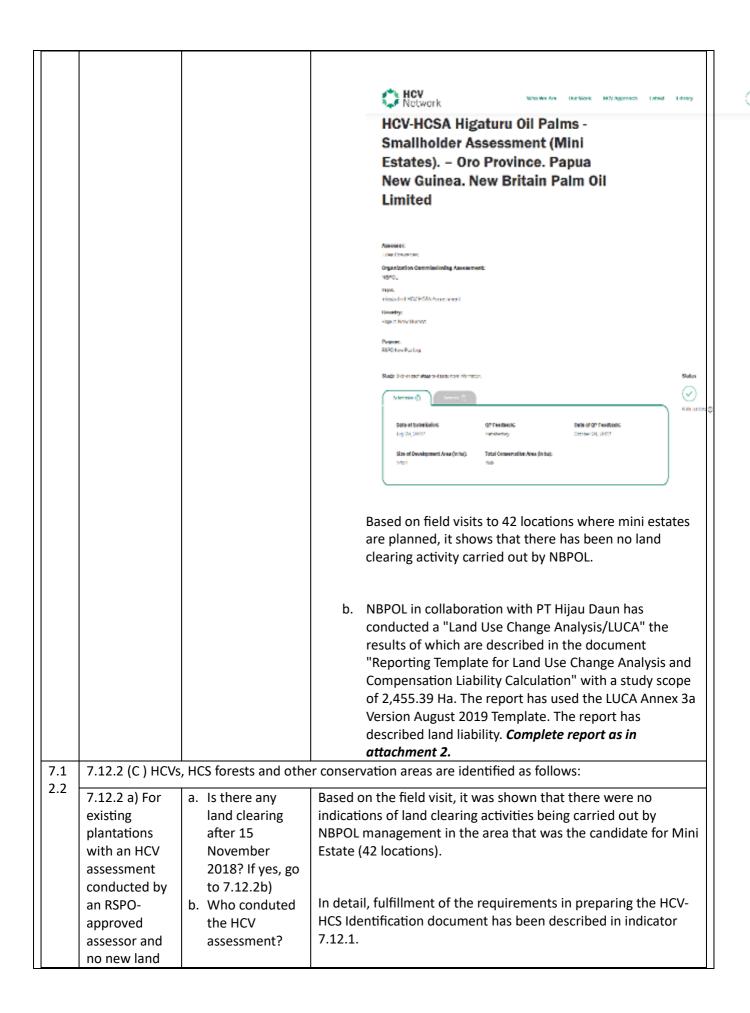
Organisation	Date	No Attending
ADRA (Kokoda Station)	19.8.2021	2
Dept of Lands (Popondetta)	20.8.2021	1
National Forest Authority (Popondetta)	20.8.2021	1

In this assessment, the HCVRN Common Guidance (CG) for HCV Identification is used. There is a PNG HCV toolkit, however this toolkit pre-dates the CG. Therefore, the CG is used as the primary resource and unless specifically stated otherwise, it should be assumed that the CG has been used for HCV identification. HCS guidance is based on version 2 of the HCS toolkit which was released dated May 2017 (HCSA,2017). Locations Identification includes 43 locations but in the current NPP only 42 locations have been proposed.



This report has been supplemented with results of identification of protected species of wildlife and plants by the IUCN redlist, CITES and laws and regulations in Papua New Guinea. This study has also identified the types of threats to the existence of HCVs as well as recommendations for their management and monitoring. NBPOL has also prepared an "Integrated Management Plan-Mini Estates" document which describes the environmental management and monitoring plan including the management and monitoring of HCV areas.

This document has gone through a review process at HCVRN and was declared passed on October 28, 2022, see https://www.hcvnetwork.org/reports/hcv-hcsa-higaturu-oilpalms-smallholder-assessment



clearing after	c. Is the HCV	
15 November	assessment	
2018, the	covers the	
current HCV	following:	
assessment of	- Presence of	
those	protected	
plantations	areas that	
remains valid.	could be	
	significantly	
	affected by	
	the grower	
	or miller;	
	- Conservatio	
	n status (e.g.	
	IUCN status),	
	legal	
	protection,	
	population	
	status and	
	habitat	
	requirement	
	s of rare,	
	threatened,	
	or	
	endangered	
	(RTE) species	
	that could	
	be	
	significantly	
	affected by	
	the grower	
	or miller.	
	- Identificatio	
	n of HCV	
	habitats,	
	such as rare	
	and	
	threatened	
	ecosystems,	
	that could	
	be	
	significantly	
	affected by	
	the grower	
	or miller;	
	d. Was the HCV	
	assessment	
	performed in	
	consultation	
	with relevant	
	stakeholders?	
	StarcHOIDEIS!	

			-
	e	. Does the HCV	
		assessment	
		include	
		checking of	
		available	
		biological	
		records?	
	t	Does the HCV	
	1.		
		assessment	
		include both	
		the planted	
		area itself and	
		relevant wider	
		landscape-level	
		considerations	
		(such as wildlife	
		corridors)?	
	ρ	. Was the HCV	
	8	assessment	
		performed in	
		accordance to	
		the latest	
		methodology	
		available at	
		global and	
		national level?	
	h	. For existing	
		plantation	
		going for	
		certification	
		after 15	
		November	
		2018, are the	
		applicable	
		requirements in	
		Annex 5	
		fullfilled?	
7.12.2 b	λ Δnv 3	Is there land	Based on the field visit, it was shown that there were no
new lan		clearing after	indications of land clearing activities being carried out by
		15 November	NBPOL management in the area that was the candidate for Mini
clearing	(111	2018?	-
existing	00000		Estate (42 locations).
plantatio		. If Yes to (a),	
new pla		does it fall into	In detail fulfillment of the requirements in averaging the UCV
after 15		any of the	In detail, fulfillment of the requirements in preparing the HCV-
Novemb	per	scenarios in	HCS Identification document has been described in indicator
2018 is		Annex 5 and	7.12.1
precede	-	the 'RSPO	
an HCV-	HCS	Interpretation	
assessm	ent,	of Annex 5 &	
using th	e	indcator	
HCSA To			
	1		J

		7.42.21.1	11
	and the HCV-	7.12.2'documen	
	HCSA	t?	
	Assessment	c. If Yes to (b), are	
	Manual. This	the applicable	
	will include	requirements	
	stakeholder	for the scenario	
	consultation	in Annex 5	
	and take into	fullfilled?	
	account wider	d. If No to (b), was	
	landscape-	a HCV-HCSA	
	level	assessment	
	considerations	conducted prior	
		to any land	
		clearing?	
		e. Is the HCV-	
		HCSA	
		assessment	
		passed the ALS	
		•	
		quality control? How was this	
		confirmed?	
		f. Was the HCV-	
		HCSA .	
		assessment	
		conducted in	
		consultation	
		with	
		stakeholders	
		and take into	
		account wider	
		landscape-level	
		considerations?	
	PROCEDURAL N	OTE for 7.12.2: For de	tails of transitional measures, refer to Annex 5: RSPO transition
	from HCV assess	sments to HCV-HCS As	sessments.
7 1	(C) In High	This shocklist will	In detail the recults of the identification of UCV UCS have been
7.1	(C) In High	This checklist will	In detail the results of the identification of HCV-HCS have been
2.3	Forest Cover	be provided once	described in indicator 7.12.1 including the FPIC process and the
	Landscapes	the procedure by	Preliminary Agreement with the community who owns the
	(HFCLs)within	the "No	land.
	HFCCs, a	Deforestation Joint	
	specific	Steering Group" is	
	procedure will	finalised.	Based on interviews with the community, the landowner stated
	apply for		that NBPOL did not practice coercion or intimidation for the
	legacy cases		"Mini Estate" development plan.
	and		NBPOL has shown evidence of the implementation of FPIC on
	development		the "Mini Estate" development plan for all customary
	by indigenous		community groups who own land and this was also confirmed
	peoples and		when the auditor conducted interviews with the 42 community
	local		groups.
	communities		bιοαμα.
	with legal or		
	customary		
		<u>l</u>	

NBPOL has conveyed information about the negative and rights, taking into positive impacts that may be caused by the "Mini Estate" development plan to the customary community who own the consideration regional and land. Based on interviews with customary community groups, national multithis has also been confirmed. stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies. PROCEDURAL NOTE for 7.12.3: 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. 7.1 (C) Where a. Has the unit of Based on the verification of the HCV-HCS documents, 2.4 HCVs, HCS certification identification and LUCA documents show that there is no forests after identified the indication of the presence of peat soil types in the 42 locations where oil palm plantations (Mini Estate) will be developed. 15 November HCV, HCS, 2018, peatland and peatland and other Based on the verification of the document "Soil Suitability and other conservation Topographic Survey Higaturu Oil Palms - Papua New Guinea, conservation areas? This is New Britain Palm Oil Limited (2022)" stated that no peat soil applicable for areas have types were found in 42 locations where oil palm plantations been both existing were planned to be developed (Mini Estate). identified, and new they are planting areas. Indicative soils (great soil groups) found within the study areas, protected b. Where (a) have derived from PNGRIS (2008). been identified and/or Order Suborde **Great soil** Brief Erosion enhanced. An on the land that description group risk integrated is intended for (PNGRIS new plantings, management 2008) plan to have new Inceptisol Andepts Dystrandepts Moderately Very low protect and/or plantings been weathered, enhance well drained planned and soils that HCVs, HCS managed to are formed forests, ensure the on volcanic peatland and identified HCVs ash. are maintained other Inceptisol Moderat **Tropepts** Dystropepts Relatively conservation and/or young, moderately enhanced. areas is well-drained developed, c. Is there an soils with implemented integrated moderately and adapted management high bulk densities. plan to protect where Low in and/or enhance necessary, and amorphous contains HCVs, HCS

monitoring

forests,

clay

minerals.

П .				I		
requirements. The integrated management plan is reviewed at least once every five	peatland and other conservation areas developed, implemented and adapted	Inceptisol s	Andepts	Eutrandepts Fluvaquents	Moderately weathered, well drained soils that are formed on volcanic ash. Poorly to	Very low Moderat
years. The integrated management plan is developed in consultation with relevant stakeholders and includes	where necessary? Is the plan contains monitoring requirements? d. Is the integrated management		•		very poorly drained soils found on the flood plains of major rivers. Organic carbon content relatively high.	e
the directly managed area and any relevant wider landscape level considerations (where these are identified).	plan developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level	Mollisols	Ustolls	Hapludolls	Moderatly well drained soils from humid climates. Profile unlikely to dry out for moe than 90 days (cumulative) per year.	Low
	considerations (where these are identified)? e. Is the plan reviewed by the unit of certification? When was the	Inceptisol s	Tropepts	Humitropept s	Have >12 kg/m2 organic carbon in the soil t a depth of 1 m and less than 50% base saturation.	Moderat e
	last reviewed conducted?	Entisols	Aquents	Hydraquents	Dominated by fine textured alluvial soil	Moderat e
		Histosols	Fibrists	Tropofibrists	Little decompose d organic soils (peats). Saturated with water for at least 6 months, black and organic matter cannot easily be destroyed by rubbing.	Very low
		Entisols	Fluvents	Tropofluvent s	Moderately well	Moderat e

			Entisols	Orthents	Troporthents	drained, stratified alluvial soils with textures of loamy fine sand or finer. Soils without any diagnostic horizons that are formed on recent erosional surfaces. Often shallow.	Moderat e	
			Inceptisol s	Andepts	Vitrandepts	Little or un- weathered Andepts. Gravelly or sandy textures.	Very low	
			all of them so area. The loc	tated that t ation wher	th 42 groups of here was no ty e the oil palm pof the land cove	pe of peat soil plantation will	in their be built is	
			(Mini Estate)	will be bui	lt, it is shown t	here oil palm plantations that all of them are minated by weeds and		
					study on the Id In detail in indic			
			Estates docu managemen and monitor maintaining plan refers to	ment in what and monitions of HCV at the conservant of the recomp	ed an Integrated lich it describes toring plan includer areas with the vation values commendations fo entification Rep	an environmouding the mar aim of protect ontained there or managing th	ental nagement ing or in. The	
7.1 2.8	(C) Where there has been land clearing without prior	a. Is there land cleared since November 2005 without prior	(mini estates	s) are plann	12 locations wh ed to be develong activity carri	ped, it shows	that there	

HCV assessment since November 2005, or without prior **HCV-HCSA** assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.

- HCV assessment?
- b. Is there land cleared since 15 November 2018 without prior HCV-HCSA assessment?
- c. If (a) or (b)
 above applies,
 has the unit of
 certification
 undergone the
 RaCP process?
- d. If (c) applies, is there evidence that compensation plan for the affected area has been approved by the RSPO? Note to auditor: Certificate shall not be issued until the Compensation Plan is approved.

NBPOL has conducted an HCV-HCS study by taking into account the fulfilment of the requirements in the preparation of the HCV-HCS Identification document as described in indicator 7.12.1

NBPOL in collaboration with PT Hijau Daun has conducted a "Land Use Change Analysis/LUCA" the results of which are described in the document "Reporting Template for Land Use Change Analysis and Compensation Liability Calculation" with a study scope of 2,455.39 Ha. The report uses the LUCA Annex 3a Version August 2019 Template. Based on a review of the document, it states that there are no indications of land clearing by companies in 42 locations prior to the HCV-HCS Assessment.

In general, the NPP verification results are as follows:

- a. NBPOL has completed the NPP submission requirements for verification in the form of: Preparation of Integrated HCV-HCS identification documents, Social Environment Impact Assessment (SEIA), Carbon Calculation using the updated method, Integrated Management plan and provision of maps required by the RSPO New Planting Procedure 2021.
- b. There were no indications that NBPOL had carried out operational activities in the field including land clearing, construction of infrastructure, or other operational activities required for the development of oil palm plantations except for fulfilling the permissible requirements such as carrying out FPIC, measuring land and marking boundaries on some of the land that will be used as the "Mini Farm" project. Estates".
- c. There is no indication of the presence of peat soil types in the entire area that will be used as the "Mini Estate" project.
- d. There is no indication that NBPOL has committed any practices that violate human rights, indigenous peoples' rights, habitat protection and protected species of wild animals/plants.
- e. NBPOL has been equipped with good operational procedures in conducting oil palm plantation development activities.

A summary of the oil palm plantation development plan under the "Mini Estate" scheme by NBPOL is as follows:

	HCV1	HCV 2	HCV	HCV4	HCV5	HCV 6	Community Use	HCS	Total Conservation	Develop Area	Total Area
Andogorari	4.73			5.61	5.61			7.15	8.02	34.65	42.67
Bafera	0.25			0.25	0.25			8.29	8.29	48.47	56.76
Bakito Extension	0.16			0.16	0.16	0.00		0.16	0.16	19.31	19.47
Beririta	0.26			0.26	0.26			0.55	0.55	39.61	40.16
Borari	0.08			0.08	0.08			1.31	1.31	41.27	42.57
Boruga Pusute Extension	0.31			1.36	1.36			1.34	2.40	43.44	45.83
Buro (Portion 911)	0.40			0.90	0.90	0.01		0.78	1.27	35.51	36.78
Dara Pema				0.23	0.23	0.13		0.83	1.19	98.62	99.81
Darau Extension				1.43	1.43		0.57		1.43	64.73	66.16
Ewasasaru	1.14			2.62	2.62	0.25		2.34	4.64	75.50	80.14
Gajarepa	2.71			2.71	2.71			2.97	2.97	96.26	99.23
H.Hombokapa	3.99			3.99	3.99			6.44	6.44	33.63	40.08
Најојо	0.19			0.19	0.19			3.06	3.06	26.83	29.89
Haugapa	11.40			11.40	11.40	0.13		12.38	12.50	42.15	54.65
Hiroipa	6.01			8.71	8.71			7.11	9.80	29.53	39.33
Hofita	7.57			7.57	7.57			13.81	13.81	33.48	47.28
Hombare									17.91	28.00	45.91
Houembo Kosote	0.04			0.04	0.04	0.13		17.91	12.89	36.89	49.78
Houpa Extension									0	47.83	47.83
Hungoro	0.07			0.07	0.07			12.77	0.07	33.20	33.28
Isugahambo (Portion 951)				14.20	14.20	0.35	0.18	0.07	14.58	15.48	30.06
Jajama	0.42			0.42	0.42			0.12	3.23	51.49	54.72
Javunipa	0.01			0.01	0.01			3.23	0.39	23.10	23.49
Kajma Estate				11.81	11.81			0.39	11.89	64.27	76.16
Kesiha				10.08	10.08			2.83	11.14	49.36	60.50
Kofureta	10.08			0.02	0.02		0.55	11.14	0.88	27.73	28.61
Korofurukari	3.69			3.69	3.69	0.13		0.31	3.82	27.63	31.45
Kovenopa Sambura				7.58	7.58	0.13		3.69	7.71	53.56	61.27
Mende (Portion 914)	0.97			7.40	7.40			1.04	7.43	70.93	78.36
Owate	0.02			0.02	0.02	0.16	0.37	0.02	0.54	55.21	55.75
Papaki Extension	6.41			6.67	6.67			9.68	9.93	89.84	99.77
Perombata Ext. (Haintapa Clan)	3.85			4.21	4.21			9.80	10.07	44.16	54.23
Perombata Ext. (Sorupa Clan)	1.76			8.15	8.15			1.76	8.15	13.58	21.73
Portion 2	3.08			39.73	39.73	0.50	112.71	1.53	128.14	45.46	173.60
Pupu	9.81			18.08	18.08			19.37	22.81	32.30	55.11
Saura (Portion 919)	3.54			3.54	3.54	0.25		20.39	20.46	26.95	47.41
Serembe - Ohogo	4.53			4.53	4.53			6.14	6.14	64.02	70.16

Sifia	0.92		0.92	0.92			0.96	0.96	27.17	28.13
Siko	2.75		2.75	2.75			3.19	3.19	68.87	72.06
Topiripa Extension	7.96		7.96	7.96			13.59	13.59	55.59	69.18
Wanipa Extension	4.46		5.35	5.35	0.01	0.01	18.12	19.02	28.14	47.16
Grand Total	103.5 5		204.6 9	204.6 9	2.15	114.39	226.5 7	412.79	1,843.74	2,256.54

Total Area : 2,256.54 Ha

Conservation Area : 412.79 Ha

Oil Palm Development Area : 1,843.75 Ha

Acknowledgement by RSPO Member	NBPOL – Higaturu Oil Palms Ltd of Sime Darby Plantation acknowledges that this NPP submission had been conducted in accordance with the New Planting Procedure 2021. All assessments had been carried out accordingly and without any prejudice. Sime Darby Plantation 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 Higaturu Oil Palms, Popondetta has been verified by GGC and has been carried out in accordance with the requirement of the RSPO New Planting Procedure 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:
	NBPOL – Higaturu Oil Palms Ltd of Sime Darby Plantation	Global Gateway Certifications
	Name of Person Responsible:	Name of Lead Auditor:
	Benjamin Osa	Nanang Mualib
	Designation:	Designation:
	Sustainability Manager	Lead Auditor
	Signature:	Signature:
	Hara	Cu
	Date: 21st May 2024	Date: 21 st May 2024