

**Roundtable on Sustainable Palm Oil
New Planting Procedures
Summary Report of Planning and Management**

**Biase Plantations Limited
(Ibiae Estate)**

**Biase Local Government Area
Cross River State
Nigeria**

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1. Executive Summary

1.1. Summary of Assessment Findings

Wilmar International is a major agribusiness group and one of the leading global producers, processors and merchandisers of oil palm and lauric oils. The company operates in more than 20 countries located in 4 continents across the world. Wilmar operates in the entire value chain of the agricultural commodity's production and processing; from growing, processing, transportation, and branding to merchandising. As a global leader in the agricultural commodities business, Wilmar is committed to ensuring that its operations meet international best practices as well as social and environmental sustainability requirements.

As part of the company's strategy to expand its palm oil production business in Africa, Wilmar sets up Biase Plantations Limited (BPL) a fully owned subsidiary of Wilmar Africa Investment Ltd which in turn is a direct wholly owned subsidiary of Wilmar International. Biase Plantations Ltd was fully registered in the Cross River State of Nigeria and issued with a Certificate of incorporation under the Nigeria's Companies and Allied Matters Act of 1990 in 10th February 2011. The company in November 2011 acquired three Estates, Biase, Calaro and Ibiae with a total land area of 19,173 ha for oil palm plantations development. The Estates are located in the Biase Local Government Area of the Cross River State of Nigeria. These estates have long been earmarked for agricultural activities and were initially acquired by the State Government for plantations development in the early 1960s. Although the three Estates were acquired by the state government for plantations development, only Calaro and about half of the Ibiae Estates (2,540 ha) were planted with oil palm in the 1960s. The unplanted areas of Ibiae (3,054 ha) consist largely of bush fallows, farm lands and degraded woodlands as well as patches of old and unmanaged oil palm plantations. Although there are no communities on the Estate besides the ex-oil palm plantation workers who reside at the old workers' camp, a number of local farmers are actively using some parts of the Ibiae Estate for subsistence farming activities.

As a member of the Roundtable on Sustainable Palm Oil (RSPO), Wilmar and all its subsidiaries including Biase Plantations Ltd are committed to ensuring that their operations comply with the RSPO certification requirements including the New Planting Procedure (NPP). Because the entire Calaro estate was fully planted in 1960's, the NPP does not apply to this Estate and the old plantings of Ibiae estate. For the remaining two other estates, Biase Plantations Ltd engaged Proforest, a RSPO approved consultant to conduct a High Conservation Value (HCV) assessment for the Biase and Ibiae Estates and a Social Impact (SI) assessment for all three areas. This report presents a brief summary and conclusions of

the HCV and social impact assessments for the Ibiae Estate only. New planting Procedure for Biase estate will be conducted separately.

Primary forests in the assessment area

There are no primary forests within the Estate. The Estate was originally earmarked for agriculture over 50 years ago and has since been used for farming activities – both commercial oil palm plantation and to a lesser extent subsistence farming in areas closer to communities. Information from the Cross River State Forestry Commission and the observations during the field investigation of this assessment suggest that the Estate is mainly farmland with isolated stands of trees exploited by illegal chainsaw operators. However, the eastern boundary of the Estate contains areas of wooded vegetation which this assessment has recommended should be excluded from conversion given the current context in Nigeria, where almost all forest cover has been lost. This wooded area in Ibiae could thus be a very important forest with the potential to regenerate and become an important ecosystem and habitat for myriad species of fauna.

For Ibiae estate the result of the identification of HCV study showed that there are two types of HCV values, HCV 4 and HCV 5 in the estate. The total recommended strict reserve areas for HCV identified is about 500.16 hectares or 9% of total study area of 5,594 Ha. HCV element 4 was the most dominant HCV which accommodate water sources for daily use, water catchment areas, flood control and erosion areas and firebreaks. There are also areas of HCV 5 that is required to meet the basic needs of local communities especially their water resources for daily use. Both HCV 4 and 5 are found with the riparian buffers of natural water courses that run across the project.

Areas of peat soils

Reconnaissance survey by a renowned soil specialist (PARAM Agricultural Soil Surveys) confirmed that there are no areas of peat soil in the assessment area.

Local people's lands

There is basically no local people's land within the boundaries of the Estate although local people have in the past been using parts of the abandoned Estate for farming. Such use rights have been traditionally recognized by both local government and Biase Plantations Ltd. The privatization council that acted on behalf of the local government have appointed an external consultant that have worked out a fair compensation rates to the local farmers who uses part of the greenfield. Upon final approval of the agreed rates of compensation by the Privatization

council, the payment to individuals who have farmed the area in the greenfield will be implemented by the local government.

For this purpose the Ibiae Estate through Biase Plantation Limited have paid the consultation fees on 24 May 2012 to the four community chiefs of Ehom, Akpet, Idoma and Betem. The traditional fees were also paid on the same day to the community chief of Ehom, Idoma and Betem. Payment to Akpet will be made once the Privatization council has given the directive to proceed. The privatization council is the body representing the local government to negotiate with the respective council of chiefs that represent the community. The receipt of the consultation fees and traditional rites is a significant event that signifies that the communities have accepted the company to operate in their land. This is the social license that is required for the company to operate.

Taking the opportunity of the presence of the Council of Chief, the company has conducted a meeting and consultations with the 4 main communities of Betem, Idoma, Ehom and Akpet on the company policy, the oil palm development plan in the area, the positive and negative impact of the oil palm industry and its mitigation plan, High conservation value areas and its protections and management and Social Impact assessment. A more detailed round of consultations in regards to grievance and complaint procedures, public information, community relations will be progressively presented to the respective community.

The forestry commission has also made an inspection visit to Calaro estates and Ibiae estates and given the approval on 27 Aug 2012 to fell the Old Palm Trees in the two plantations. Biase Plantations Limited has been advised to notify the Forestry Commission once Ibiae Estate is ready to commence land preparation for the balance of green field areas.

Handing over of Community Land to Local Government

The Privatization Council that is representing the local government has met with the Council of Chiefs many times over. On 9 Aug 2011, the privatization council finally concluded the meeting and the inputs of the local communities were included in the fundamental of agreements. The fundamental terms agreement and together with the deed of conveyance executed by the council will constitute all the title documents prior to the issuance of the Certificate of Occupancy as the final title document. The Fundamental terms agreement and Deed of conveyance was signed in May 2012. The Fundamental documents will stipulate the fees for consultations and traditional rites and also that the company need to pay the annual royalty

fees for using the land at a rate determined by the State Agriculture Ministry. All these payment will be paid directly to the Chieftains in the presence of the Council of Chiefs.

From the social impact study it can be concluded that the proposed agro-industrial oil palm plantation development will create employment and other business opportunities for the host communities and the general population in the project catchment area and beyond. The intervention will also maximize the economic potential of the land which is currently tied up with old-aged and low production oil palm plantations, thus currently denying the landlord communities and state government to realize the full economic potential of the land. This notwithstanding, implementation of the proposed intervention will potentially cause environmental and social impacts such as those detailed in this report and are generally associated with large-scale industrial oil palm plantations. This may include loss of biodiversity and their habitats, loss of riparian vegetation and local population Non Timber forest Product (NTFP) collection areas. The proposed project may also have significant impact on agricultural lands for the production of food crops which when occur could jeopardize the food security potential of the area and possible high prices of food crops. However, the expected impact on agricultural lands and food security is expected to be very low since most landlord communities in the area intimated that their farmlands are located outside of the Estates. Given that the proposed intervention would have several positive impacts which are very much needed for the development of the area in particular and for the Cross River State in general, it is recommended that authorities consider the overall cumulative impacts of the proposed intervention on the population of the host communities as well as the state and the general Nigerian economies.

From the Environmental Impact study conducted by Ibara Environs Consultants, it can be concluded that there is potential impact by the presence of Ibiae estates towards the environmental impact to the area. The possible environmental impact that can occur in this project can be divided into 4 phases of its development namely, Site preparation/Construction phase, Palm oil base/Company phase, Operation & Maintenance phase and Decommissioning phase. These impact can be broadly summarized as increased soil and vegetative cover disturbance, existence of solid and liquid effluents, reduction in water quality, reduction in air quality and increased air emission regard with combustion of all engines, increased in noise level, increased in surface run-off, increased in soil erosion and sedimentation, increased in soil fertility and finally potential for open burning.

1.2. Assessment result

The social and environmental impact assessments were detail, comprehensive and professionally carried out. The management plans have included the findings of the EIA, HCV and SIA assessments by consultants accredited and approved by the RSPO – Proforest (and for EIA, a consultant approved by the government – Ibara Environs Consultants). Biase Plantations Ltd has adhered to the RSPO New Planting Procedures and has documented the assessments and plans according to the RSPO templates issued in May 2011. SGS auditors conducted desktop study, verified all the related documents and conducted site visit from 24th to 25th September 2012. SGS Auditor confirmed that the assessment and plan are comprehensive, professional and compliant to the RSPO principles, criteria and indicators.

2. Reference Documents

2.1. Lists of Reports

- i. Social Impact Assessment of the Biase-Calaro-Ibiae oil palm concessions for Biase Plantations Ltd, Cross River State, Nigeria. April 2012, by Proforest.
- ii. Assessment of High Conservation Values in Wilmar's Biase and Ibiae Concessions, Biase Plantations Ltd, Cross River State, Nigeria. May 2012, by Proforest.
- iii. Environmental Impact Assessment (EIA) of Biase/Ibiae oil palm plantations, Biase Plantations Ltd, Nigeria. May 2012, by Ibara Environs Consultants.
- iv. Permit register.
- v. Land release and compensation record.
- vi. Minutes of Meetings with Communities on Public awareness of the Project (FPIC- Free Prior and Informed Consent).
- vii. Soil and Feasibility Report.

2.2. List of legal documents, regulatory permits and property deeds related to areas assessed

Legal documents

The list of legal documents reviewed includes:

- The Cross River State of Nigeria Forestry Commission Law 2010
- National Environmental (Control of Bush, Forest Fires and Open Burning) Regulations, 2011
- National Environmental (Surface and Groundwater Quality Control) Regulations, 2011
- National Environmental (Watershed, Mountainous, Hilly and Catchment Areas) Regulations, 2009

- Federal Environmental Protection Agency Act
- National Biodiversity Strategy and Action Plan
- National Minimum Wage (Amendment) Act of 2000
- National Policy on Environment 1999
- National Environmental (Sanitation and Wastes Control) Regulations 2009
- The National Environmental (Watershed, Hilly, Mountainous and Catchment Areas) Regulations, 2009
- National Land Use Act of 1978

Regulatory permits and property deeds

The regulatory permits reviewed as part of this assessment includes:

Table 1. Relevant legal documents, regulatory permits and property deeds of BPL

No.	Permits	Remarks
1	Fundamental Agreement	Cross river state council on privatization and Biase Plantations Ltd. Dated May 2012
2	Deeds of Conveyance	Cross river state council on privatization and Biase Plantations Ltd. Dated May 2012
3	Forestry Commission	Forestry Commission Dated August 2012
4	Environmental Impact Assessment (EIA) of Biase/Ibiae oil palm plantations	Final review by Federal Government of Nigeria

2.3 Location maps – both at landscape level and property level

The Ibiae concession is located in the Biase Local Government Area in the Southern Senatorial District of the Cross River State, South of Akpet, capital of the Biase LGA. Ibiae lies approximately 82 kilometres north of Calabar on the Calabar-Ikom highway, in the vicinity of the Cross River, with its easternmost edge at 5°33’N and 8°12’E (Figures 1, 2, 3). The concession is surrounded by a number of small towns and villages including Idoma, Betem, Igbofia and Akpet Egbai (Figure 2).



Figure 1. Map of Western Africa with location of Nigeria and Cross River State

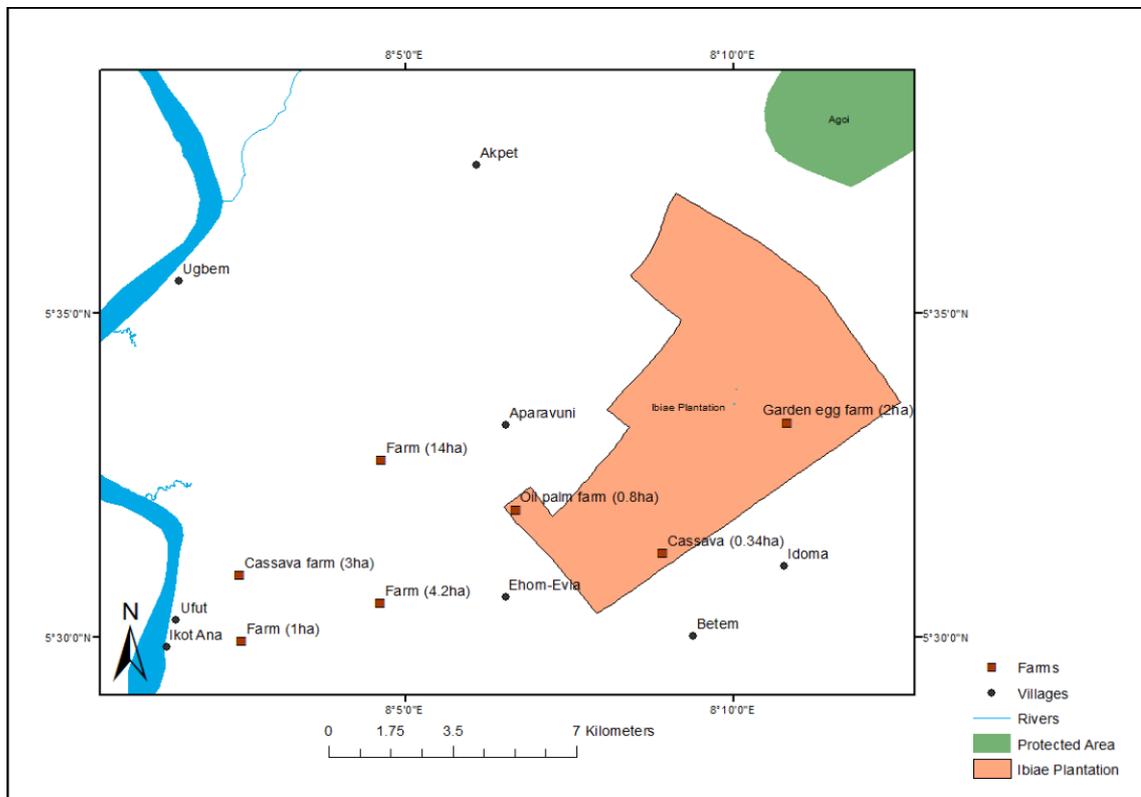


Figure 2. Map of the Ibiae concession with locations of some of the farms identified in the field

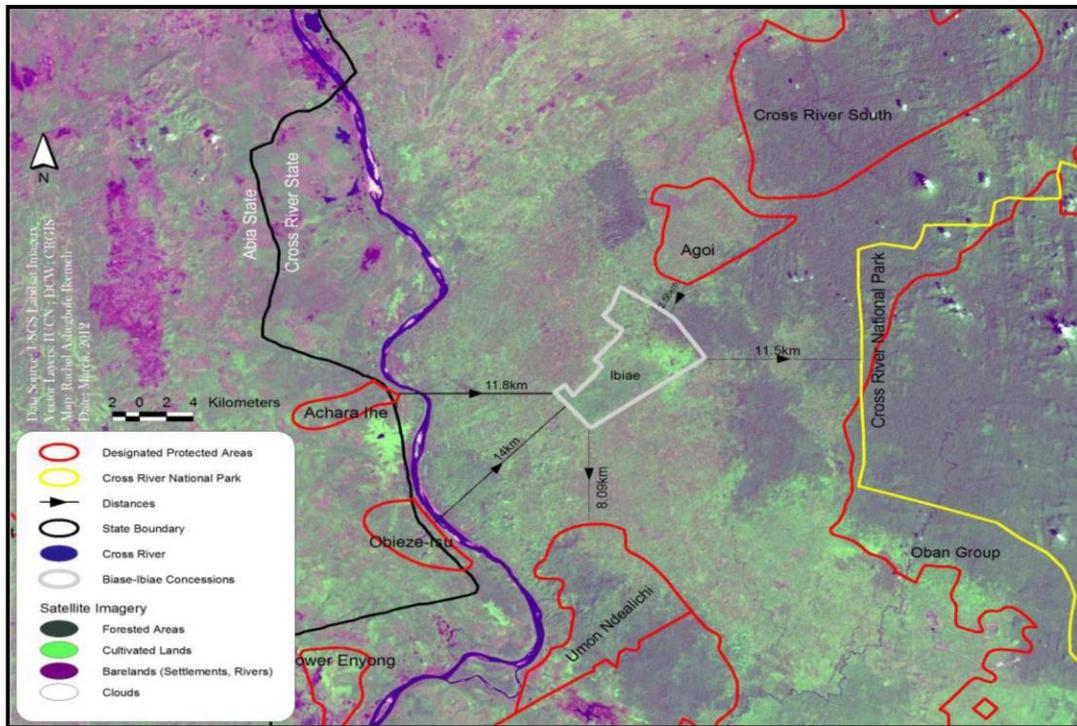


Figure 3. Map of the Ibiae concession showing different protected areas in the landscape

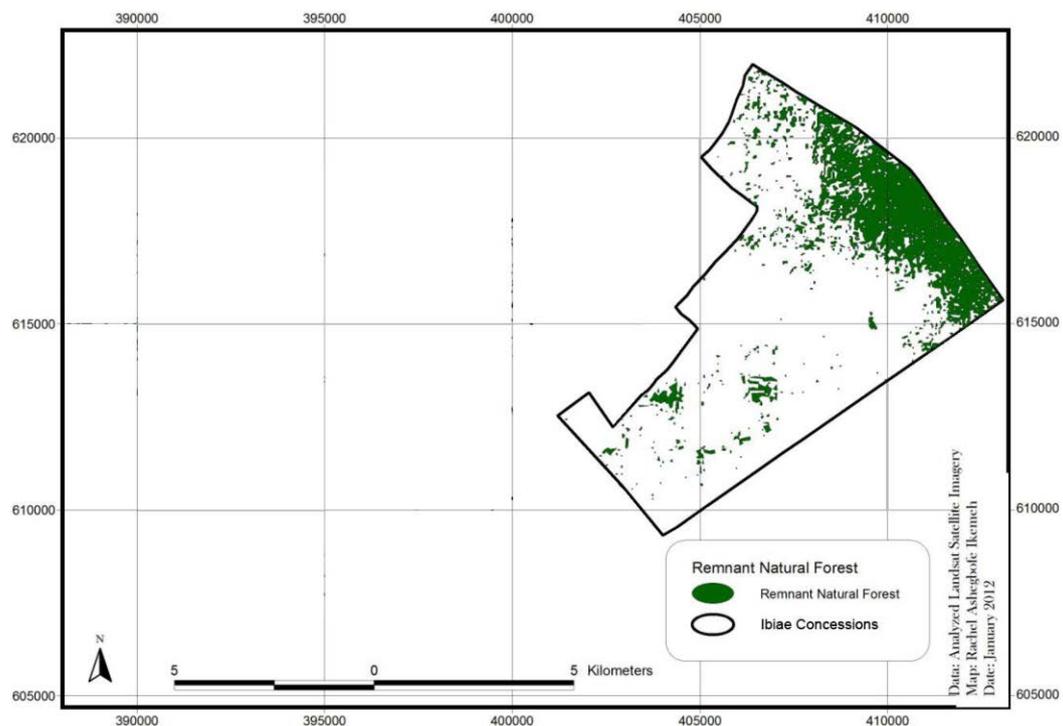


Figure 4. Satellite imagery of Ibiae concession showing areas with forest cover

2.4. Area of new plantings and time-plan for new plantings

As defined by RSPO Procedure for New Planting Guidance document dated 12 May 2010, only the unplanted portion of the 3,054 ha or 55% of the total area of Ibiae estate of 5,594 ha will undergo the new planting procedure.

The balance of the green fields will be developed once the New Planting Procedure (NPP) is approved. The company intends to plant all the available areas within the Estate with oil palm except the identified HCV management areas and recommended buffer zone limits for water bodies.

3. SEIA and HCV Management and Planning Personnel

3.1. Organizational information / contact person

Contacts details of the company are as follows:

Company Name:	Biase Plantations Limited
Address:	134 MCC Road, Calabar Sub District: Biase Local Government Area District: Cross River State Country: Nigeria
Contact Person:	Mr. Lee Kok Seng / Mr. Paul Odey
Telephone:	+2348037413050 (Paul Odey)
Email:	leeks@wilmar.co.id ;
Capitals Status:	Foreign Investment Company
Status Business Land:	Country Lease
Total Area:	5,594 ha (Ibiae Estate)

3.2. Personnel involved in planning and implementation

Those involved in the planning and implementation will be General Manager, Estate Manager, Community & Public Relation, Legal & Government Relation, Biodiversity, Environmental Health and Safety Department. Generally the organization chart shows as below.

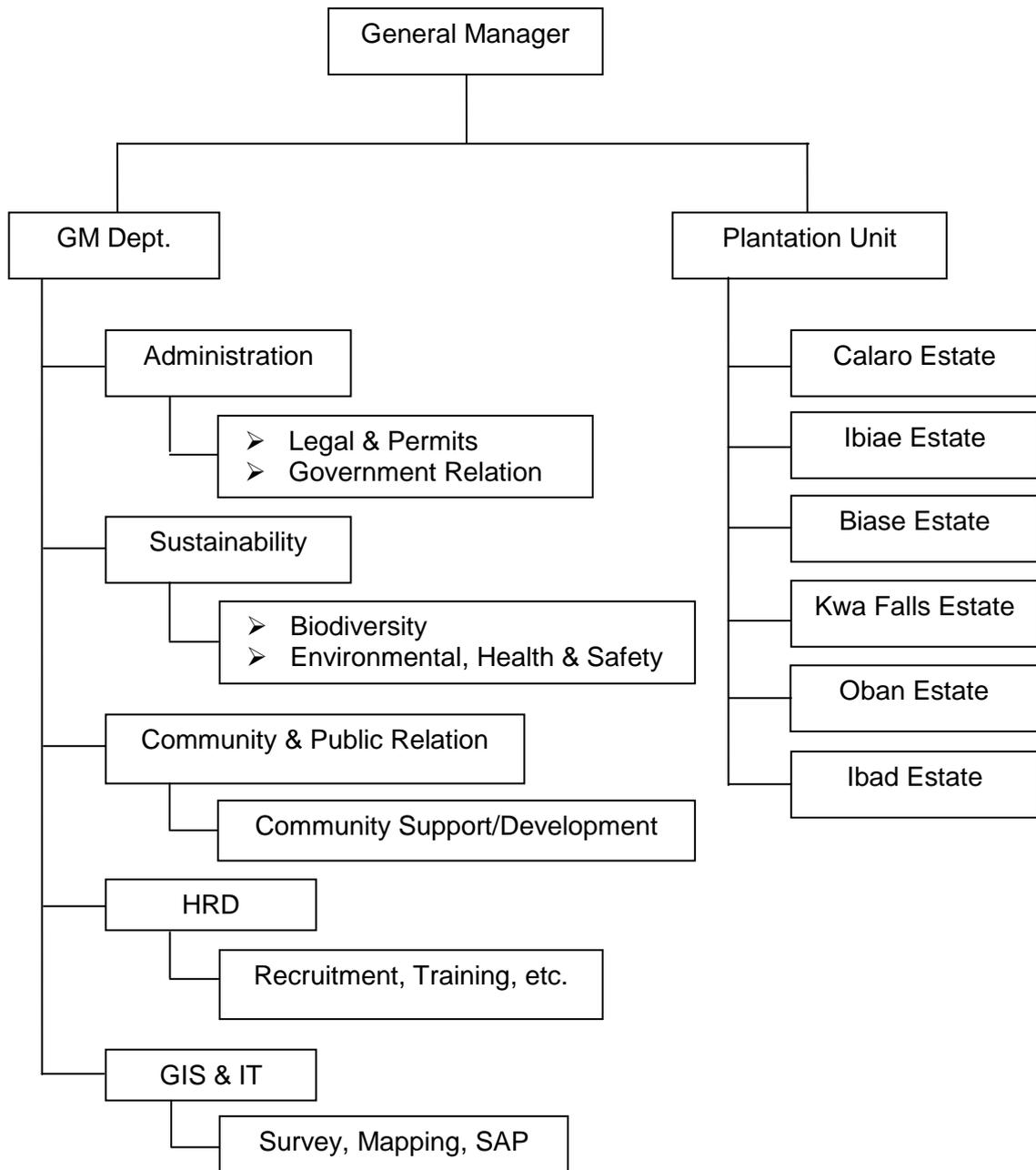


Figure 5. Organization chart involved in planning and implementation

3.3. Stakeholders to involve

Local communities who are and will be affected by the development of Biase Plantations Limited as identified in the Social & Environmental Impact Assessment report. Relevant government departments will also be involved.

4. Summary of Management and Mitigation Plans

4.1. Summary of Social Environmental Impact Management and Mitigation Plan

The following management and mitigation measures have been arranged for adoption and implementation to address the significant potential social and environmental impacts in order to make the project socially acceptable and beneficial:

- Avoidance of displacement of communities and people
- Preservation of community farmlands
- Identification and appropriate management of traditional conservation areas including other high conservation values in the landscape
- Water resource protection measures
- Fire prevention programmes and zero or controlled burning
- Corporate social services to communities
- Public and occupational safety and health measures
- Provision of health care services and HIV prevention

Table 2: Summary of SEI Management and Mitigation Plan in the Ibiae Estate

Action / control to mitigate	Responsibility	Timeframe
Mitigation target/objective: Avoidance of loss of farmlands, destruction of community conservation areas and NTFP collection sites		
Aim to avoid community farmlands for oil palm development	Ibiae Estate	Prior to and during project development
Where farmlands are to be converted to oil palm plantations, ensure that Free, Prior and Informed consent of farmers are obtained and appropriate compensations paid prior to conversion	Ibiae Estate	Prior to and during project development
Continue engagement with local communities	Ibiae Estate and communities	Throughout the development
Ensure HCV management recommendations are adopted and fully implemented	Ibiae Estate	Prior to and during project development
Consider introduction of high yielding varieties of other agricultural commodities to enhance productivity per unit area	Ibiae Estate	As and when identified as viable option
Mitigation target/objective: To eliminate or minimize the impacts of the oil palm plantation development on food security of the area		
Implement the proposal to allocate part of the concession to the local communities who are working for the plantations areas for farming	Ibiae Estate and communities	Within first 3 years of project implementation
Look into the potential for introducing high yielding cassava and other food crop varieties to boost agricultural productivity	Ibiae Estate	Within first 3 years of project implementation
When required, implement training skills and development programmes on agricultural practices	Ibiae Estate and Host communities	After the third year of project implementation
Mitigation target/objective: To minimize influx of plantation workers and its implications on		

communities' family structures and social networks		
Priority is given to host communities for all categories of workers to be recruited provided they have the requisite knowledge and expertise	Ibiae Estate and communities	Throughout the project's life
Skills audits are undertaken to determine training and skills dep't requirements	Ibiae Estate	Within first 3 years of project inception
When required, implement training skills and development programs for employees	Ibiae Estate, Host communities	After the 3 rd year of project inception
Develop database of local service providers and ensure they are informed of tenders	Ibiae Estate	Within the first 3 year of project
Monitoring of operations impacts on local communities and population	Ibiae Estate	3 Years after commencement, then bi-annual
Mitigation target/objective: To avoid use of hazardous substances and minimizing water pollution due to agro-chemicals, sewage from worker's camps and POME		
Only agro-chemicals registered by the National Environmental Standards and Regulations Enforcement Agency NESREA or those allowed under Nigerian laws should be used	Ibiae Estate	Throughout project life
Develop and implement instructions for application of agro-chemicals and disposal of waste	Ibiae Estate	Before plantation field activities
Application of agro-chemicals should be in strict compliance with manufacturer's instructions and generally established safety procedures	Ibiae Estate	Throughout project life
POP or Persistent Organic Pollutants banned under Stockholm Convention of 17 th May 2004 should not be used	Ibiae Estate	Throughout project life
Mitigation target/objective: To ensure that plantation development and processing activities do not occur or destroy traditional conservation areas including riparian vegetations		
Adoption and implementation of HCV, SIA and EIA recommendations	Ibiae Estate	Throughout project life
Continuous engagement with host communities	Ibiae Estate and communities	Throughout project life
Compliance with policies legal, regulatory and traditional systems	Ibiae Estate	Throughout project life
Training and instructions for field operators and supervisors	Ibiae Estate	Annually
Effective and efficient monitoring of plantation management and operational plans	Ibiae Estate	Throughout project life
Mitigation target/objective: To avoid or minimize the exposure of workers and local communities to health risk including HIV Aids		
All tasks are risk assessed and appropriate protective gears provided	Ibiae Estate	In 1st year of operation
Decent and adequate toilet and sanitation facilities for workers camps and quarters	Ibiae Estate	During construction phase
Development and implementation of waste management plans	Ibiae Estate, workers and communities	Throughout project life
Regular assessment of medical status of workers in high risk areas	Ibiae Estate	Throughout project life
HIV and AIDS policy for workplace	Ibiae Estate	Throughout project life
Adoption and implementation of health education programmes	Ibiae Estate and Workers Unions	Throughout project life
Mitigation target/objective: To minimize impacts of operations on public facilities and structures		
Where feasible Biase Plantations should provide	Ibiae Estate	As and when

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similar facilities or infrastructure for its operations		necessary
Ensure that damage caused to public facilities are appropriately fixed and within reasonable timeframe	Ibiae Estate and contractors	Soon after damage is identified
Develop guidelines for key activities that could potentially impact on public facilities	Ibiae Estate	Within 2 years of operations
Regular and effective monitoring of operation's impacts on public facilities and infrastructure	Ibiae Estate	To be part of monitoring
Support to the development of public facilities and infrastructure (e.g. schools, road building and maintenance, electricity, etc.)	Ibiae Estate	Throughout project life
Mitigation target/objective: To maximize local employment and ensure reasonable quality of life and working conditions of workers in plantations and mills		
Ensure workers' conditions including salaries and wages are at least the same or exceeds the conditions for similar category of work in Nigeria	Ibiae Estate and contractors	Throughout project life
Dialogue, regular interactions and effective communication with workers union	Ibiae Estate and Workers reps	Throughout project life
Develop and implement code of conduct to cover the activities of workers house on site	Ibiae Estate	Throughout project life
Ensure workers have appropriate and safe means of transport to and from work site	Ibiae Estate	Throughout project life
Adopt and implement disputes and grievance resolution policy	Ibiae Estate	Throughout project life
Mitigation target/objective: To avoid displacement of communities and people		
Measures shall be taken to avoid displacement of communities and people	Ibiae Estate	Throughout project life
Where displacement of people and/or communities are necessary measures are taken to ensure their Free Prior and Informed Consent are sought	Ibiae Estate	Throughout project life
Where displacement of people and/or communities occur appropriate and acceptable compensations are paid	Ibiae Estate	Throughout project life
Displacement of people and/or communities are carried out in accordance with Nigeria's legal requirements and international best practice	Ibiae Estate	Throughout project life
Mitigation target/objective: To avoid/minimize potential impacts of pollution, safety, noise and dust and damage to roads caused by heavy vehicles and construction activities		
Ensure recommendations contained in EIA are fully implemented	Ibiae Estate and contractors	Throughout project life
Implement dust suppression measures for heavy vehicles such as wetting of roads on regular basis during dry seasons and as and when necessary	Ibiae Estate and contractors	Throughout project life
Ensure all vehicles are roadworthy, drivers are qualified and are made aware of dust, noise and safety issues. Mill operators must be provided with adequate protection for noise, dust and provided with adequate training on health and safety and milling competency. A noise mapping of the mill to identify areas with more than 90 decibels must be conducted and regularly monitored.	Ibiae Estate, Mill and contractors	Throughout project life
Ensure drivers adhere to speed limits and institute and implement sanctions for violators	Ibiae Estate and contractors	Throughout project life
Ensure damage caused to roads by your operations are repaired	Ibiae Estate and contractors	Throughout project life
Mitigation target/objective: To avoid plantation development in High Conservation Value		

forests and other ecosystems		
Ensure recommendations contained in HCV and EIA reports are implemented to avoid development in HCV areas	Ibiae Estate, communities and contractors	Throughout project life
Support the enforcement measures (<i>in collaboration with state institutions and local communities</i>) for controlling other unauthorized activities in HCV management areas	Ibiae Estate	Throughout project life
Measures are taken to restore where necessary a degraded HCV management areas	Ibiae Estate	Throughout project life
Mitigation target/objective: To avoid pollution or destruction of water bodies and riparian vegetation		
Adopt and implement impact assessment management recommendations (HCV and EIA)	Ibiae Estate	Throughout project life
Respect and compliance with legal and regulatory requirements	Ibiae Estate and contractors	Throughout project life
There shall be no development in buffer zones and watershed. This has to be clearly marked.	Ibiae Estate and contractors	Throughout project life
Dumping of waste into water bodies must be avoided but where necessary, the waste should be treated to an acceptable standard (as per NESREA requirements). Mill Effluent must be treated to be below the legal limits for BOD and will be channeled to the fields as irrigation.	Ibiae Estate/Mill and contractors	Throughout project life
Mitigation target/objective: To minimize air pollution in plantation and mills operations		
Ensure that there is no open burning being carried out. If burning becomes necessary due to Pest and disease problem, all legal requirement must be fulfilled and the relevant guidelines for open burning be implemented. There should also be a well equipped and trained fire fighting team in the estate	Ibiae Estate	Throughout project life
Smoke emissions from the mill boiler must be monitored continuously to ensure compliance. Similarly vehicles with excessive smoke emission must also be prevented from operating until the matter is addressed.	Ibiae Estate/Mill and contractors	Throughout project life

4.2. Summary of HCV Management and Mitigation Plan

In order for Biase Plantations Ltd to meet the RSPO certification requirements particularly those related to the NPP, it is crucial that the company implements the recommendations described in the HCV assessment report. To ensure that the field operations follow the steps indicated in the report, Biase Plantations Ltd will designate a person responsible for monitoring the implementation in the field of the measures for protecting and maintaining HCVs in the Ibiae Estate. This person will be given the authority, time and resources to train staff properly, prepare robust Standard Operating Procedures (SOPs) including recommendations contained in the detailed HCV report and to organize the plan activities before the conversion operations, and to monitor them in the field. Summary of the Mitigation Plan will be elaborated and adopted by Biase Plantation Ltd to ensure effective maintenance and enhancement of the identified HCVs.

Table 3. Summary of HCVs identified with management plan for Ibiae Estate (BPL) are show in the table below.

HCV	Management Objective	Spatial Presence	Management Plan
4.1	To ensure perpetual flow of clean water for the host communities by setting aside and maintaining appropriate buffer zones for all rivers and streams in the concessions.	All rivers in the concession	Riparian vegetation and buffering of rivers and streams which depend on the width: <ul style="list-style-type: none"> • 10 meter wide buffer zone on each side of smaller streams (up to 5 meters in width) • 50 meter wide buffer zone for rivers greater than 5 meters but less than 20 meters in width • 100 metre wide buffer zone for big rivers (greater than 20 metres in width) These are to be established mapped and respected. Management plans include protection and maintenance of buffer zones, erosion control practices for all areas with slopes of more than 5 degrees.
4.2	To avoid erosion problems caused by the oil palm plantation development especially in hilly and fragile soil areas	Various but diffused throughout the concession	Management plans include a ban on plantings in areas with slopes greater than 25 degrees as well as implementing strict erosion control measures in areas with slopes between 18 and 25 degrees.
5	To ensure that the oil palm plantation development programme does not threaten communities' access to water resources.	Assorted and scattered	Implementing the buffer zones and erosion control measures.

Table 4: Summary of HCVs Mitigation Plan in the Ibiae Estate

Legend			
Actions to be implemented:			
	Before conversion	During conversion	After planting

Objective	HCV Ref	Action to mitigate	Monitoring measures / expected result	Timeline
Maintaining water quality and the HCVs it supports				
Protection of rivers	4.1	1) Buffering of water bodies 2) Water bodies in the concessions serve as sources of water for most host communities in the area and are therefore classified as HCV 4.1	Set aside buffer zones included in GIS database as HCV 4.1	
	ALL	Accurate mapping of all HCVs and their management areas in the concessions should be carried out including mapping of steep slopes.	Availability of accurate maps of all HCVs management areas	
	ALL	Designation of a responsible person for all “HCVs” to provide training and ensuring that field workers adhere to management recommendations for HCV areas		
	4.1	Workers and staff responsible for HCV delineate 10 meter buffer zones on each side of streams (<5m width)	Measure river width/buffer zone width Buffer zones included in GIS database	
		HCV field team to delineate 50 meter buffer zones on each side of rivers with width of 5-20m	Measure river width/buffer zone width Buffer zones included in GIS database	
		HCV field team to delineate 100 meters buffer zones on each side of major rivers with width greater than 20 m e.g. the Cross River)	Measure river width/buffer zone width Buffer zones included in GIS database	
	4.1	Land preparation teams are trained to respect buffer zones	Evidence of training and understanding of buffer zones management and monitoring recommendations and requirements Buffer zones are respected	
		Land preparation teams are provided with maps of areas identified as protected areas		
		Land preparation teams are trained to carry out land conversion laterally to buffer zones to avoid having it destroyed by falling trees and shrubs	No impact on buffer zones	
ALL	Regular monitoring to ensure that buffer zones	Corrective actions record		

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		requirements are respected If buffer zones are not respected, corrective actions must be taken immediately		
		Bridges and means of crossing rivers must be pre-planned		
		Bridges and means of crossing rivers must be done according to recognized best practices	Check erosion around bridges	
Erosion control	ALL	HCV or environmental management field team are trained to implement and respect erosion control recommendations	Training records and proof of application of required measures	
	4.1 ; 4.2	Areas with slopes above 25 degrees are excluded from conversion	Areas above 25 degrees are delineated on the ground and recorded in GIS database and on maps	
		Areas with slopes between 18 and 25 degrees are identified and mapped. Such areas may be planted on condition that erosion control measures such as terracing is implemented.	Area delineated on the ground, recorded in GIS database and appropriately mapped.	
		All areas with slopes categories are mapped in GIS database	GIS database – Slopes map	
		Conversion team/Road construction team trained to implement erosion control measures	Training records and application of measures in practice	
		Roads are planned prior to conversion to avoid being perpendicular to slopes and to avoid fragile soils	Road map – Contour map	
		SOP for terracing is completed before conversion	Records on SOP	
		Cleared vegetation is windrowed	Evidence of windrowed in the field	
		Road soakaways are built depending on downslope of road being constructed	Frequency/slope	
		Silt pits are built to avoid sediments being discharges into rivers		
	4.1	Appropriate leguminous cover crops and native tree species that do not have invasive properties are selected for revegetating denuded buffer	Biase Plantations should justify the choice of tree species and leguminous crop	

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		zones to avoid invasiveness		
		Cover crops are planted immediately after conversion to avoid erosion of soils during the first rains	Date of planting	
Monitoring of water quality	4.1	Annual water quality testing for major rivers and all other rivers that are sources of water for host communities	Test results	
		Regular meetings with the host communities on control and prevention of water pollution	Minutes of meetings	
		SOP in place for Corrective/Preventive action to be taken in case of degradation of water quality	Documented SOP	
Respect and Maintain local populations basic needs				
Implementing FPIC	5	Recruit a responsible Community Liaison Officer		
		Biase Plantations Ltd should define its FPIC process and arranging for competent body to undertake FPIC	SOP	
		Discuss and negotiate with the host communities, appropriate consultation processes including frequency of community meetings	Community representative list	
		Define conflict resolution procedures with local communities	SOP	
		Identify appropriate management areas for Ufut and Ehom-Evia community forests and delineate those areas	Social HCV areas included in GIS data base and mapped	
		Negotiate management decisions for HCV areas following the company's FPIC procedures	Signed agreement with community/concerned people	
Monitoring result		Regular (twice a year at the beginning of the project, minimum once a year after relation with communities are strengthened) evaluation of changes in communities needs	Minutes of meetings	
Conversion operation				
	N/A	Land conversion operations shall start during the dry season unless there are compelling	Records on starting dates for operations	

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		reasons to do so during a rainy season		
	N/A	Land conversion should start away from the protected areas and moving gradually towards those areas		
Scientific Research				
	N/A	Development of partnership on hydrology research		
Implement recommendation in the field				
	N/A	Designation of a responsible person for monitoring the field implementations of HCV management recommendations		

5. Internal Responsibility

**Acknowledgement of internal responsibility
by Biase Plantations Limited**

I the undersigned, being the legal
representative of the inspected company,
agree with the contents of this report



Name : Simon Siburat
Title : Group Sustainability Controller