



## NATIONAL AGENCY FOR NATIONAL PARKS

**Conseil Climat  
Forestry and Agriculture Coordinator**

### **RESPONSE TO THE CRITIQUE OF OLAM AND GABON BY THE NGOS “MIGHTY” AND “BRAIN FOREST”.**

I feel it is necessary to respond in full to the American non-profit organisation, Mighty, who published a highly critical report on Monday 12 December entitled: **“PALM OIL’S BLACK BOX : How agribusiness giant Olam’s emergence as a major palm oil trader is putting forests in Southeast Asia and Gabon at risk”**.

Whilst the content focusing specifically on Gabon has carefully selected factual content, the overall tone of the report lacks context and in balance; and this, along with a number of derogatory phrases when referring to Gabon and our JV partners, gives a highly misleading and unfair critique of sustainable agricultural development in Gabon.

The tone of this one-sided report suggests that Gabon is wantonly destroying its forests. Mighty do not recognize the exceptional circumstances in Gabon – the highest forest cover per capita of any rainforest nation (with forests covering 88% of the country) and one of the lowest deforestation rates on the planet.

Rather than responsibly convert some areas of degraded forest to instigate an agricultural economy, Mighty believes that Gabon should rely on ecotourism and carbon finance to replace oil dependence.

Whilst international donors and finance are valuable, and ecotourism is certainly an economic opportunity to be maximized, the Government must provide a broader economic opportunity base for its people. Under its National Strategic Development Plan, which aims to allow the country to transition to become an emerging economy, agriculture is a critical pillar.

In fact, ignoring these realities, the NGO seems to suggest that the Gabonese nation does not have the right to cut a single tree in order to develop our nation or to feed our people, even if we continue to develop climate sensitive and resilient agriculture.

#### **Rationale behind the development of palm oil plantations**

Gabon imports around 60% of its food, which is a drain on the economy. While agro-forestry has contributed to the economy, agriculture, both large and small scale, is essential not just to ensure food security but to reverse a long trend of rural exodus, which has been driven by a lack of opportunity and jobs for people in the countryside.

However, agriculture cannot be boosted without major investment. A major aspect of Gabon’s Strategic Development Plan is therefore the Joint Venture with Olam, to develop both cash (export) crops and staple food crops.

The choice of palm plantations was a strategic decision for the Government. Extensive palm plantations were once part of Gabon's history – in areas now covered in rainforest, archeological evidence shows that extensive palm cultivation was widespread between 2300-1400 BP before forests grew back after a human population crash.

Palm is also one of the most high-yielding and least labour-intensive of all crops, which is ideal for a country like Gabon with a very low population density. A native crop, it offers the best economic and social outcome for the smallest environmental footprint possible. Our commitment to sustainable development means that Gabon is the only nation globally on track for 100% certified, traceable and segregated RSPO palm oil production.

Whilst a proportion of the palm oil will be exported, bringing Gabon foreign exchange through the Joint Venture with Olam, there will be significant domestic consumption. And, with over 6,000 Gabonese workers on the plantation learning about sustainable agriculture, it is stimulating local food production.

Olam is further contributing to food production through its social contracts with the villages and also through the GRAINE project. This smallholder programme is a unique development pioneered by Gabon to encourage the transfer of these skills to staple crop farming, providing financing, training, secure land tenure and the dignity of self-determination to many Gabonese who would otherwise have few pathways out of poverty. While eco-tourism is certainly one option to create rural jobs (and is being advanced), it cannot embrace large numbers of people quickly, as jobs must be based on demand from tourists and are linked to expensive infrastructure development. This demand has to be created, bringing its own environmental challenges. Today GRAINE already embraces almost 16,000 co-operative members.

### **Understanding Gabon's approach to its forests**

**“Whereas all developed nations have lost the majority of their forests through the development process, Gabon is committed to charting a new, sustainable development model that will preserve forests.”**

For those who have not visited Gabon, forest covers 88% of the land, while the remaining areas are relatively infertile grassland, swamps or towns. Much of the forest is dense and rich with wildlife of which the country is a proud steward.

Gabon is also fully understanding of the role its forests play fighting global warming. Over the last 15 years the country has made a huge effort to reform forestry, in order to minimize forest degradation, and to reduce deforestation. Through forest policy changes, strict application of the National Parks Law and the adoption of a policy forbidding export of unprocessed timber, Gabon has reduced CO<sub>2</sub> emissions from forestry and deforestation by approximately 530 million tons since 2005. We have set aside 21% of our territory as protected areas and have invested tens of millions of dollars of State funds on conservation and fighting wildlife crime (particularly the massacre of forest elephants and other wildlife by organized criminal networks, but also fighting illegal forestry and fisheries).

The Strategic Development Plan is fully compatible with the country's Climate Action Strategy; and the adoption of a Sustainable Development Law in 2014 embeds the principals of sustainable development and inter-generational equity in National Law.

Gabon has committed through its Nationally Determined Contributions to unconditionally reduce its total carbon emissions by 50% compared to a 2005 baseline by 2025, which will be impossible unless forestry and land conversion to agriculture are carefully controlled.

Our JV with Olam will hold to our national policy, as it develops; we are already holding Olam to the strictest environmental and social standards. They are proactively respecting these government-imposed norms; and they are actively contributing to Gabon's sustainable economic development plan as well as creating much-needed rural jobs and revenues for Gabon's predominantly young population.

### **Selection of areas for land development:**

The report draws selectively on OLAM's Environmental and Social Impact Assessments and describes the choices made by both the Gabonese Government and OLAM Gabon during the first phases of oil palm development in Gabon.

One key tool is the National Land-use Plan, which is currently being developed ([www.pnatgabon.ga](http://www.pnatgabon.ga)).

The Plan aims to optimize land allocation to agriculture, forestry, conservation and other uses in order to achieve sustainable, climate sensitive development in Gabon. The national objectives for subsistence and industrial agriculture can be achieved by allocating already degraded areas that have been farmed in the past by rural peoples, logged and secondary forests of low ecological value, and parts of savanna-dominated regions. The rural population density of Gabon is about 1/66<sup>th</sup> that of Indonesia so the requirement for agricultural land is far less. It is therefore a fantasy to imagine, as Mighty seems to, that Gabon will convert its ancient forest landscapes to industrialised agriculture; only a small percentage of the least valuable forest lands will be made available through the National Land Use Plan for such developments.

The land use planning process is documented in the Gabonese National Park Agency's draft oil palm policy, which was shared with stakeholders including Brain Forest in 2015 for comment; as well as in two peer reviewed scientific publications<sup>1</sup>. Mighty's report makes no mention of any of this planning work, which we believe is quite unique in the tropics.

Attribution of the Olam oil palm permits has been a key test case in the development of this Land Use Plan. Whereas the first permits (much criticized by Mighty in the report) in the Kango area were issued before the National Land Use planning process was underway, the rejection by Olam of two of the three permits was consistent with preliminary recommendations of the Landuse Committee formed to develop the plan; and the Awala concession later served as a test case for the national landuse planning team, which identified subsequent concessions offered to Olam. It was incorrect of Mighty in their report to assert that Olam only gave back these areas in response to an investigation by Rainforest Foundation.; this was undertaken proactively by OLAM and the government after the ESIA's.

The carbon and conservation analyses conducted by the Gabonese Government prior to allocating the subsequent Olam oil palm concessions meant that land allocation was optimized to make it possible to develop carbon neutral oil palm plantations with minimal impacts of

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<sup>1</sup> (Burton et al., **Reducing Carbon Emissions from Forest Conversion for Oil Palm Agriculture in Gabon**, Conservation Letters, June 2016 - <http://onlinelibrary.wiley.com/doi/10.1111/conl.12265/abstract> and Austin et al., **An assessment of High Carbon Stock and High Conservation Value approaches to sustainable oil palm cultivation in Gabon**, *Environmental Letters in press*).

biodiversity and ecosystem services. Olam's careful, landscape scale environmental and social impact assessments, including forest carbon mapping, HCV analyses and an FPIC process, further confirmed the Government's analysis and resulted in significant conservation set asides. These decisions have also been validated by independent research on Olam's carbon emissions.

### **Why Gabon believes the High Carbon Stock Approach does not address the needs of the country**

Gabon has a national commitment to protect high carbon stock forests, described in its NDC to the UN Climate Convention. We welcome an inclusive, science-based approach to conserving forest carbon. Mighty insists however, that Gabon should adopt a 'branded' High Carbon Stock Approach, developed specifically to address the catastrophic destruction of S.E. Asia's forests. The 2015 "HCSA Toolkit" did not address the case of highly forested nations like Gabon, and the new 'convergence' toolkit is unpublished; we understand that it also does not address cases like Gabon, and is untested. Therefore, we believe that this insistence on HCSA is not well-founded.

HCSA is an industry standard that needs to take its proper place within a national land use plan to protect forests and wildlife, and a legal framework for minimizing emissions. The Gabonese Government understands and encourages our agricultural industry to comply with global industry standards, and is therefore happy to invite the HCSA working group to visit and engage with Gabonese stakeholders, so that an inclusive standard can be developed.

Overall Mighty has not recognised the conservation, land management and landuse planning efforts the Gabonese Government has made consistently over the last 15 years. Nor the fact that Gabon's forest management practices have resulted in over 500 million tons of avoided CO<sub>2</sub> emissions, that our protection and forest management efforts mean that today Gabon's forests sequester about 60 million tons of CO<sub>2</sub> per annum and that Gabon is, and has committed to remain, a net sink of CO<sub>2</sub>. Indeed, independent research carried out in Gabon shows that the Olam JV developments are themselves climate-positive, due to the extensive areas of forest conserved and restored, and the majority of planting in Savannah areas. None of these achievements are referenced in the one-sided report.

### **Protecting our iconic wildlife**

We have actively worked with OLAM from the outset to ensure that oil palm developments do not negatively impact Gabon's critically important ecosystems and species, including chimpanzee and gorilla populations, and will apply these standards to all other companies requesting concessions in Gabon. We are also working together to develop a national human elephant conflict mitigation plan, such that rural agriculturalists and elephants can co-exist. Multiple ESIA's show that the areas allocated to Olam were heavily hunted for bushmeat, including protected species. Olam's actions in partnership with government agencies, to protect very extensive areas of core habitat and to prevent poaching (including significant investment in wildlife management and monitoring), are expected to lead to a long term increase in local animal populations, not the reverse. None of these considerations are referenced in the one-sided report.

### **Investing in technology to eventually reverse tropical deforestation**

In Gabon we are supportive of global commitments for slowing, halting and eventually reversing tropical deforestation. Despite the dominance of forests in Gabon, we are actively investigating how we can achieve zero net deforestation, through carefully planned land

conversion for agriculture and compensatory forest conservation and restoration elsewhere.

The Gabonese Government has invested in a space agency with the capacity to download satellite imagery both for Gabon, and the entire African rain forest belt, in order to develop national capacity to mosaic satellite imagery in order to overcome the technical issues referred to in the Mighty report, and publish an annual evaluation of deforestation and re-forestation in Gabon ([www.ageos.ga](http://www.ageos.ga)). None of these preparations are referenced in the one-sided report.

### **Invitation to Senator Waxman to visit Gabon**

In conclusion, it is greatly disappointing that none of these points appear in the Mighty report, or any of the huge social benefits derived from steady employment and rural investment – perhaps because the Mighty team never took the time to discuss their work with the relevant stakeholders?

However, we do not believe that Mighty is opposed to Gabon's urgent need to diversify its economy, relieve poverty, provide secure jobs and rural land tenure, and ensure food security. They have simply never visited Gabon to understand the unique work that we have done in our JV with Olam, or discussed this work with us. Therefore, we are delighted that Senator Waxman, Chairman of Mighty, has accepted the personal invitation from Gabon's Prime Minister to engage in a meaningful discussion and we hope that he will visit Gabon and our JV plantations, to provide Mighty with the true and accurate picture of our national development strategy

In the same way, we would be happy to engage in discussions with NGOs, investors, palm oil customers and experts interested in knowing the government's strategy and the hard and pioneering work Gabon is doing to get our development right.

We invite all interested parties to come and see what we are doing, and to contribute constructively to help us do better.

Professor Lee White CBE  
Director of National Parks  
UNFCCC Forests and Agriculture negotiator for Gabon

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Professor Lee White CBE has worked in Gabon's national parks for over 25 years, as a researcher, trainer and manager, initially as the director of the Wildlife Conservation Society's Gabon Program and over the last 7 years as the head of the Gabonese National Parks Agency. He has published over 95 scientific papers and book chapters and written and edited 12 books on tropical forests and their management. Under his leadership ANPN is becoming an internationally renowned parks agency, with 750 staff including a newly formed armed wing, the National Parks Gendarmerie, created to help in the battle against ivory poaching. In addition to his role managing national parks he is one of Gabon's principal negotiators in the climate change negotiations, where his dual Gabonese and British nationalities give him a unique perspective on the discussions between developed and developing nations. He is also Gabon's Scientific Authority for CITES and the IWC Commissioner.

He is an Honorary Professor at the University of Stirling and an Associate Researcher in the Gabonese Institute of Tropical Ecology. Professor White was made a Chevalier de l'Ordre de Merite Nationale in 2003 for his contribution to the creation of Gabon's National Parks and was awarded a CBE for his contributions to conservation in Central Africa in the Queen's Birthday Honours List in 2010.

