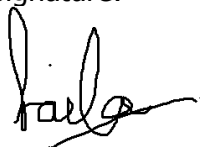


RSPO NPP Verification Statement
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New Planting Procedure Verification Statement	
1. Date of Notification	16/10/2019
2. Client Information	
Name of Grower	Olam International Limited
Subsidiary of (if any)	Olam Palm Gabon SA
RSPO Membership No.	1-0114-12-000-00 (member since 10/02/2011)
3. Verification Date	
Document review	09/03/2019 – 11/03/2019; 15/06/2019; 05/08/2019
Field verification	13/03/2019 – 14/03/2019
4. Location of proposed new Planting	
Grower Address	Galerie Tsika, En Face de city Sport. Mbolo, BP: 1024. Libreville, Gabon (head office)
Business Permit	OPG Company Registration Number: RG LBV 2011B10857 ESIA certificate No 1769 from the Minister of Water and Forestry dated 14/11/2018. Long term agriculture lease No. 0000707/ANUTTC/DG granted by the National Agency of Town Planning, Topographical Work and Cadastre (L'Agence Nationale de l'Urbanisme, des Travaux Topographiques et du Cadastre (ANUTTC) dated 15/04/2016.
Type of Business	Oil Palm Plantation
Size (ha)	5,488ha
Contact person	Laila Wilfred
E-mail address	laila.wilfred@olamnet.com
Geographical location	Province of Moyen Ogooué, approximately 140 km from Libreville and 35 km north of the provincial town of Lambaréné, Gabon
Spatial Reference (GPS Coordinates) (e.g. N 1° 50' 5.0" E 103°27' 47.23")	Northern boundary - 10°25'11.557"E; 0°18'02.643"S Southern boundary - 10°24'52.557"E; 0°24'42.675"S

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Boundary Map	Available									
Areas and time plan for new plantings	<p>Total concession area – 5,488ha</p> <table border="1"> <thead> <tr> <th>No.</th><th>Remarks</th><th>Size (Ha)</th></tr> </thead> <tbody> <tr> <td>1.</td><td>New Planting*</td><td>347</td></tr> <tr> <td>2.</td><td>HCVMA HCS Forest area total (including HCV overlap) Other planted area that is conserved</td><td>5,141 4,743.1 397.9</td></tr> </tbody> </table> <p><i>Note: * there is no new planting per say as the 347 has been planted by SIAT Gabon. Please refer to section 6 below for more description.</i></p> <p>On 10th June 2019 Olam has informed the RSPO that it will not proceed with any new development in the proposed new planting area. This submission is only for 347ha.</p>	No.	Remarks	Size (Ha)	1.	New Planting*	347	2.	HCVMA HCS Forest area total (including HCV overlap) Other planted area that is conserved	5,141 4,743.1 397.9
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1.	New Planting*	347								
2.	HCVMA HCS Forest area total (including HCV overlap) Other planted area that is conserved	5,141 4,743.1 397.9								
5. Statement of Acceptance of Responsibility for NPP										
<p>Olam Palm Gabon SA had completed the necessary assessments for the submission of the of this new oil palm planting development at Bindo-Bifoun and the assessments are completed in accordance to the RSPO New Planting Procedures 2015.</p> <p>The assessments conducted including High Conservation Value (HCV) Assessment, Land Use Change Analysis (LUCA), Social and Environmental Impact Assessment (SEIA), High Carbon Stock (HCS) Assessment, Greenhouse Gas (GHG) Assessment, Soil Suitability Study and Free Prior Informed and Consent (FPIC).</p> <p>Olam Palm Gabon SA accept the responsibility for all the assessments conducted and management are presented as part of the NPP Summary of the SEIA, HCV and Management Plan document.</p> <p>Olam Palm Gabon SA signs to confirm that the necessary assessments have been done and completed in accordance to the NPP.</p> <p>Name of Grower: Olam Palm Gabon SA Name of Person Responsible: Laila Wilfred Position: Assistant Manager, Sustainability – Palm & Rubber Date: 20th Aug 2019 Signature:</p> 										
6. Verification Statement by BSI Services (Malaysia) Sdn. Bhd.										

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Olam Palm Gabon (OPG) SA is a subsidiary of Olam International Ltd, an RSPO member since 10/02/2011. OPG is currently managing a total area of 181,096ha through a public-private partnership between the Government of Gabon (GoG) and Olam International Ltd.

In 2016, OPG has acquired this 5,488ha Bindo-Bifoun concession from Société d'Investissement pour l'Agriculture Tropicale (SIAT), Gabon. The concession was not fully developed by SIAT Gabon. In between 2007 and 2013, SIAT Gabon has cleared approximately 647ha. When OPG acquired the concession from SIAT Gabon, it was found that 347ha out of 647ha was planted with oil palm while remaining 300ha was abandoned and currently in regenerating stage. The land clearance and development by SIAT was done without submitting New Planting Procedure and no HCV assessment was conducted. Hence, as Olam International Ltd is an RSPO member, they are obliged to fulfil the New Planting Procedure requirements despite the clearance was not done by OPG. However, the submission of this NPP is only restricted to the 347ha developed area. The remaining 5,141ha will be conserved by OPG as per the recommendation of the HCS Assessment.

The NPP verification was conducted through document and field verification. BSI's assessors had conducted the preliminary document review on 09/03/2019 – 11/03/2019 while the field verification was conducted on 13/03/2019 – 14/03/2019. During the field verification, activities includes meeting and interview with local people / villagers and relevant stakeholders (including government officials) that were affected by the Bindo-Bifoun concession development. The assessment team had also interviewed OPG's executives and staff assigned for this NPP.

Through interview process with the affected surrounding community and stakeholders, the assessment team could confirm that information on the new planting development has been communicated transparently and the communities have been activity participating in especially identifying the HCV, the social impact and development of management plan and social agreement. As this verification is a compensation or replacement to the non-submission of NPP by SIAT Gabon, there were no evidence that FPIC was conducted by SIAT Gabon prior the development / clearance. In the spirit to fulfill the NPP requirements, OPG has re-conducted the FPIC with the communities despite the land has been developed. The FPIC process carried out by OPG has been verified during the interview with the communities and relevant stakeholders. The communities had also involved in the determination of HCV and had involved in the SIA. The communities was involved in developing both the HCV and Social management plan.

During the field assessment, it was observed that there is no new development by OPG. OPG is only maintaining the 347ha oil palm. As the requirement of the NPP 2015, the below are the summary of the compliance to FPIC with respective principles within the RSPO P&C 2013.

Compliance to 2.2 – OPG had received the legal land usage through transfer from SIAT and this has been approved by the local authority by approving OPG the ESIA certificate. During the assessment, the legal boundary has been marked and the marking had involved the local communities whereby the verification tam had confirmed with the communities. During the interview with the local communities, it was confirmed that there was not land dispute while FPIC was conducted as a supplementary to what was no previously conducted by SIAT.

Compliance to 2.3 – the communication between OPG and the communities is French. Documentation documenting the FPIC, maps, SIA are all in French which could be understood by the local communities. Mappings of on the land use by local communities are made available to the communities. The determination of the land usage are through participatory. Mappings are clear and the scale of the mapping are appropriate.

Compliance to 6.2 – communication procedure is in place and associated with the FPIC procedure. OPG had established social team to constantly engage with the affected communities. Records of communication between OPG and the communities were sighted during the field assessment and stakeholder interview. The list of stakeholders was also established by OPG.

Compliance to 6.4 – the procedure to identify legal, customary or user rights has been established. While during the communities interview, it was confirmed that the identification of legal, customary and user rights was conducted participatory. There was no compensation identified as the communities has no use on the

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land that was already previously developed by SIAT. However, the communities informed the verification team that they can still access to the forest for their hunting activities.

Compliance to 7.5 – as described, the land was previously developed by SIAT without undergone NPP. OPG has completed this NPP to compensate the non-submitted NPP. Hence it was clear that the land was developed within proper consent. The minimum building block was already existed before OPG acquisition. However, OPG has documented the FPIC and communicated to the communities. During the interview, the communities did not object about the developed oil palm.

Compliance to 7.6 – There is no compensation associated with this NPP. However, OPG has developed the compensation procedure and negotiation procedure to accommodate any future dispute.

The below table summarizes the assessment reports that were reviewed and verified by the assessment team to conclude the reports are comprehensive and following the requirements of NPP with details on the assessment result. The reports are carried out by qualified professionals and deemed credible.

Social & Environmental Impact Assessment (SEIA)

Assessment date	Aug 2017 – Dec 2017	Report Date	Mar 2019
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Details

The SEIA was independently conducted by Terre Environnement Aménagement (TEREA) with assistance from Gabon Research Institute for Tropical Ecology (IRET) under the Gabon Centre National de la Recherche Scientifique et Technologique (CENAREST).

TEREA has established expertise in sustainable management since 2005 and currently managing more than 8,000,000 hectares of forest in Central Africa. TERE team include environmental experts and engineers specialized in forestry, biochemistry, socio-economics, and Geographic Information Systems (GIS).

The Team that has completed this SEIA includes-

1. Mr. Aubin MBOUMBA – expert in HCV
2. Mr. Guy-Roger MBATOUILA OBOLO – sociologist
3. Mdm Amélie MORIN – expert in biodiversity

The other associates to this assessment is provided in the SEIA report.

The SEIA report is less than 3 years old.

Compliance to RSPO P&C 2013

5.1 & 6.1 – The impact assessment was conducted by independent party. The impact assessment was completed in a holistic manner to cover the developed area. The independent consultant has identified both the negative and positive impacts. The consultant has proposed the appropriate management plan to mitigate the negative impacts and to promote the positives impacts.

The impact assessment has been conducted with participation with the local communities. The consultation was conducted between 12 to 22 December 2017 while the Public stakeholders consultation on the report was on 03/05/2018.

High Conservation Value (HCV) Assessment

Assessment date	May 2017 – Dec 2017	Report Date	Oct 2018 (second submission)
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Details

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The HCV assessment was conducted by Proforest. The assessment report was submitted HCVRN on 24/04/2018 with "unsatisfactory" results. The report was resubmitted on 02/11/2018 with "satisfactory" results.

The report was made publically available at the HCV Network website on 05/12/2018 (<https://hcvrn.egnyte.com/dl/MyIw67dSwL/>).

The Lead Assessor for this assessment is Michael Senior. He has been granted Full License (ALS17002MS) since 03/05/2019. During the assessment, he was holding a provisional license since 27/01/2017.

The HCV assessment report is less than 3 years old.

Compliance to RSPO P&C 2013

5.2 & 7.3 – The HCV assessment was conducted for the wider landscape covering the entire 5,488ha concession. The HCV identified as per the assessment report is HCV 1, HCV 4, HCV 5 and HCV 6. The HCV identification was conducted with participation of the local communities and local authorities. Evidence of attendance was made available in the HCV assessment full report.

As described, the submission of the NPP is to supplement the non-submission NPP by SIAT. Hence the development of the 347ha had completed. However, during the onsite verification, it was observed that there are no other development especially in the HCV 1 area. Furthermore, OPG was awaiting for the results of the HCS to determine possibilities of greenfield development.

The mitigation and monitoring plan recommended by the Proforest was considered into OPG's management plan which is submitted together in this submission.

Land Use Change Analysis (LUCA)

Assessment date	28/02/2019	Report Date	Incorporated directly into the summary assessment report
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Details

The analysis was conducted internally by OPG. Since the developed area is less than 500ha, as per NPP 2015, internal assessment is permitted. The assessment was conducted by Robert Horaliman Sinaga. He is an GIS expert that has previously worked for Aksenta. He was previously registered as HCV assessor.

The assessment was conducted on 28/02/2019 which is less than 1 year at the time of the verification.

Since Olam is a member since 09/10/2006 and the HCV Assessment results was in Oct 2018, the period of analysis applicable for OPG is

Period 1: 2005 –2006

Period 2: 2006 - 2009

Period 3: 2010 – 2018

The reporting period is as per Annex 3 of RaCP.

Compliance to RSPO P&C 2013

7.3 – OPG took over the land from SIAT. During the acquiring of the concession, the land has been developed by SIAT without prior HCV and NPP. Due to the obligation as RSPO member, OPG has conducted the required assessment and submit this NPP. There was no new development by OPG since acquire the concession from SIAT. Further commitment was made by OPG that have assess the HCS using HCSA to ensure that conservation and no development if the undeveloped area are not sustainable to be developed.

On 10th June 2019, following our letter to the RSPO on 8th April 2019 for clarification on the NPP, Olam has decided not to proceed with any new development in the proposed new planting area. This is regretfully despite Olam's commitment and financial, time and HR investment. Based on the studies, BB was identified as fragmented and poorly connected landscape from an ecological perspective but fast growing species

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Parasolier formation has been identified as young regenerating forest under HCSA methodology as high carbon stock area. This shows Olam's challenge in implementing HCSA in a High Forest Carbon landscape. The HCV assessment was conducted by Proforest and management plan was established as stated above. The LUC analysis was conducted internally as permitted by NPP 2015 as the development area is less than 500ha.

The land was previously developed by SIAT and after OPG acquired and took over the land, no new development was held.

Despite the land was developed by SIAT probably without FPIC, OPG has supplemented the FPIC and has developed social contract with the communities. The management plan of the local communities was identified in the SEIA and is within the management plan of the summary of assessment.

Soil and Topography

Assessment date	October 2018	Report Date	October 2018
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Details

The assessment was conducted by Param Agricultural Soil Surveys. The survey was conducted in October 2018 covering concession area of 6,890.3ha, which 1,285.7ha is the concession for this NPP submission. Maps are available to demonstrate the type of soil presents in the concession.

The slope of the concession ranges from 0%-24%. The main slope ranges from 4%-12% which covers 5,738.1ha. The main soil group present in the concession is Ferralitic and Hydromorphic. There is no peat soil present.

Through the experience of the verification team, it acknowledged that Param Agricultural Soil Surveys has sufficient experience to conduct the survey.

Compliance to RSPO P&C 2013

4.3, 7.2 & 7.3 – Maps are available in the survey report providing soil type and elevation. The management plan recommendation was provided by the assessor and has been included in the summary management plan for this NPP. The road maintenance program has been established by OPG and was verified during the verification. As there is no peat, drainability and subsidence monitoring is not required.

Greenhouse Gas (GHG) Assessment

Assessment date	Mar 2017 – Jan 2018	Report Date	26/04/2019
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Details

The carbon assessment was conducted as part of the HCV assessment by Proforest led by Michael Senior. The team that conducted the assessment consist of expertise in GIS and landscape ecology.

As a commitment to an implementation for promoting best practices in reporting net GHG emission, the GHG Assessment has been completed following the requirement of RSPO GHG Assessment Procedure for New Development 2016 to comply with the RSPO P&C 2013 criteria 7.8 which require new planting are designed to minimize greenhouse gas emission. The report includes identification and estimation of potential sources of emission and sinks of carbon associated with the new planting. There are 2 scenario studied for this submission and Scenario 1 was selected for the new development including measures for enhancing carbon stock and minimising GHG emissions through conserving riparian and gallery forest.

The GHG assessment is less than 3 years old.

Compliance to RSPO P&C 2013

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7.8 – OPG has engaged Proforest to conduct the High Carbon Stock assessment to determine the area that could be developed. The HCS assessment report dated 05/12/2018 was conducted using the HCSA methodology. The management plan to minimized net GHG emissions has been established and included in the summary management plans.

7. Conclusion

Based on the above verification it is concluded that assessments conducted by Olam Palm Gabon has complied with the RSPO NPP Procedures 2015 (RSPO-PRO-T01-009 V1.0). The BSI's assessment team deemed that the management plans developed by OPG are comprehensive, of professional quality and has complied with the RSPO Principles, Criteria and Indicators. The grower has the legal right to use the land. While considering that the land was developed by SIAT the minimum building blocks was already laid before an adequate FPIC. OPG has conducted the FPIC to cover the gaps left by SIAT. This has sufficient to address that FPIC is adequate conducted for those blocks laid. Despite that all OPG has complied with the NPP 2015, due to non-submission of NPP prior development, the site shall be sanction for 3 years from the date of certification.

Prepared by,
Signed on behalf of
BSI Services Malaysia Sdn. Bhd.

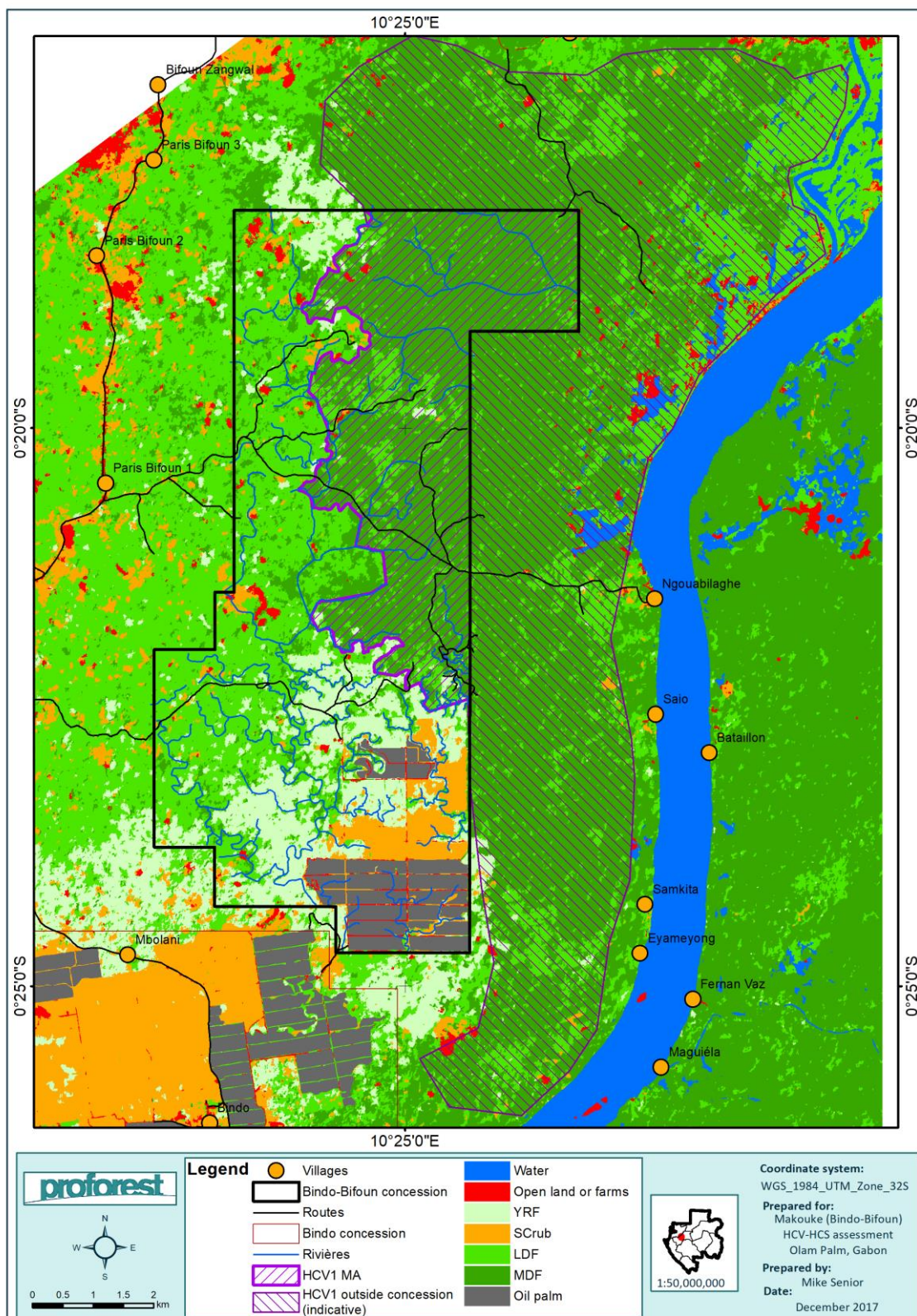
Name: Nicholas Cheong
Position: Lead Assessor
Date: 16/10/2019

Signature:



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NPP Boundary Map



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Not applicable as the development has been completed. The submission of this NPP is to supplement the previously non-submission by SIAT.