

Sustainability Action Plan January 2021 Update

“The Sustainability Action Plan (SAP) aims to strengthen the company’s sustainability processes and practices, implement RSPO Complaints Panel Directives and address identified issues. Implementation of the SAP officially commenced in September 2018 with the advisory support of Earthworm Foundation (EF).

Implementation continues with most process changes already made and documented in revised Standard Operating Procedures (SOPs). While fulfilment of MoU commitments to communities continue to progress, resolution of grievances with some communities, suspended in 2019 due to an RSPO directive to select an independent mediator, resumed in March 2020 with the first on-site engagement by ProForest. ProForest reported progress in the process of resolution and a follow-up site visit is scheduled for February this year.”

B ENVIRONMENTAL MANAGEMENT										
B.1	No development of and conservation of HCS areas	B.1.1	Organize a training on the new HCS Approach especially on: oModule 2 – Social requirements (version 2.0 May 2017) oModule 3 – Integration of HCV HCS Forest and FPIC (version 2.0)	B.1.1.1	Explore opportunity for HCS training with HCSA Africa and attend training when available					Internal training re-adjusted indefinitely to 2021, due to travel restriction under COVID-19 . Exploring appropriate training opportunities in Africa.
				B.1.1.2	Obtain approval from HCSA on the reports and maps					Commenced. EF field assessment completed in Q4 2020. Awaiting report, and subsequent outcome of on-going consultation with HCSA.
		B.1.2	Review the previous HCS work (Grand Kru & Sinoe) in alignment with the new HCS Approach toolkit (integration of the community livelihoods programme (COPP perspective and alternative livelihoods)	B.1.2.1	Review all HCS work (Grand Kru and Sinoe) and produce new updated HCS reports and maps to be submitted to HCSA					Done.
				B.1.2.2	Ground check of HCS clearance claim and develop remediation action. Develop and implement the ICLUP (Integrated Conservation and Land Use Planning)					Commenced. EF field assessment completed in Q4 2020. Awaiting report, and subsequent outcome of on-going consultation with HCSA.
				B.1.2.3	Define a prospective land acquisition plan for all the new development (Example: Barclayville, Juazon, etc.)					Yet to commence. Subject to further consideration on the proposed new areas. Expansion drive suspended indefinitely.
										Subject to completion of HCV-HCS re-assessment.
B.2	No development of and conservation of HCV areas	B.2.1	Develop management and monitoring plan as well as implementation for protecting the HCV area.	B.2.1.1	Development of management and monitoring plan according to established HCV maps					Subject to completion of HCV-HCS re-assessment.
				B.2.1.2	Conduct socialization to Operations, workers and community to increase awareness and protection of HCV and HCS areas					On-going as part of community and employee engagement.
				B.2.1.3	Conduct field inspections conducted regularly to ensure implementation of mitigation plan					Inspection on-going routine. To be reviewed and consolidated subject to completion of HCV-HCS re-assessment.
B.3	Yield improvement without intensification of use of chemical pesticides and fertilizers	B.3.1	Establishment of integrated pest management	B.3.1.1	Establishment of IPM Plan, which contain identification of potential pests and thresholds, technic use to control (cultural, biological, mechanical and physical methods) pest attacking, identify and plant native species used as part of biological control method refer to SOP and Concession Agreement.					Completed.
				B.3.1.2	Having well documented IPM implementation records including records of training to IPM workers					Completed.
		B.3.2	Proper usage of POME for fertilizers	B.3.2.1	Conduct study of the optimum area for POME application for effluent mill with capacity 40 mt FFB/hour and for new pond capacity.					Completed.
				B.3.2.2	Tarjuowon North (TNRE) estate/TRJM needs to record how much the total POME application, replace broken flowmeter					Completed.
				B.3.2.3	Building of additional POME pond					Yet to commence. Subject to on-going research.
				B.4.1.1	Conduct assesment of pollution and GHG emission resource from the entire operational aspect .					Completed.
B.4	Greenhouse gas emissions	B.4.1	Report and reduce greenhouse gas emissions	B.4.1.2	Establish action plan to mitigate or reduce the pollution and GHG emission.					Completed.
				B.4.1.3	Calculate the operational GHG emission using RSPO GHG calculator ver.3.1 and report it to RSPO.					Done. Iterative process.
				B.5.1.1	Check BOD and other parameter in POME discharge to plantation refer to regulation.					Done. Iterative process.
B.5	Waste management	B.5.1	Improve waste management	B.5.1.2	Engage the government about the license/permit for the hazardous warehouse base on the EMPL Regulation Section 64.					Engagement done. Licencing process under periodic review.
				B.5.1.3	Stored and disposed used chemicals and their containers responsibly according to GVL Procedure, EMPL and best practices.					Done. Iterative process.
				B.5.1.4	Have well documented waste management and disposal plan to avoid or reduce pollution.					Completed.
				B.5.1.5	Arrange logbook for hazardous warehouse. Some of the amount must refer to the logbook of general warehouse. For example amount of ex-pesticide bin in to the hazardous warehouse must be consider to the amount of pesticide bin put from chemical warehouse.					On-going.
				B.5.1.6	Develop the implementation of 3R (Reduce, Reuse, Recycle) and separation of domestic waste into organic and inorganic waste to simplify the management.					Completed.
				B.6	Energy efficiency	B.6.1	Improve energy efficiency	B.6.1.1	Improve efficiency of the use of fossil fuel and optimization of renewable energy.	
B.6.1.2	GVL should calculate how much renewable energy use per ton CPO or palm product, estimated fuel use by on-site contract workers and transport and machinery operations and electricity use in operations.									Draft completed. To be reviewed and finalized Mar 2021.

