

Sustainability Action Plan
October 2022 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). This update includes some recommendations made by the HCSA Grievance Panel.

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 with ProForest mediating for Tarjuowon. ProForest has completed its field engagements in March 2021 with a communique signed by all parties and report submitted to the RSPO. The RSPO Complaints Panel is deliberating on the report and GVL is waiting for instructions on next steps. The RSPO has also recommended a facilitator for Butaw but this was rejected by complainant NGOs in February 2021. Currently awaiting further guidance from RSPO on this.

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	B.1.1.1	Explore opportunity for HCS training with HCSA Africa and attend training when available															Exploring appropriate training opportunities in Africa	Exploring appropriate training opportunities in Africa.				
				B.1.1.2	Obtain approval from HCSA on the reports and maps																	On-going. Final EF field assessment scheduled for Q1 2022 (after earlier assessments in Sinoe East and GK concession areas). This will inform outcome of on-going consultations with HCSA	Preparing for submission to 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.	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)																		Completed (in March 2022) and draft report under review. Verification of all assessed HCV-HCs patches on-going, after which final report for entire concession. Target Jul 2022.	Report completed. Action plan developed for mitigation, and under implementation.	
		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.	Yet to commence. Subject to further consideration on the proposed new areas. Expansion drive suspended indefinitely.				
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.2.1.0	Conduct HCS assessments on all developed areas; construct land use change maps, establish cleared HCS and develop new baseline map																As in B.1.1.2 above.	As in B.1.1.2 above.			
				B.2.1.0	Conduct HCV/HCS Assessments for MoU areas for planned development																		As in B.1.1.2 above.	As in B.1.1.2 above.	
				B.2.1.0	Update HCV/HCS maps																			As in B.1.1.2 above.	As in B.1.1.2 above.
				B.2.1.0	Get community agreement and incorporate into MOU																			As in B.1.1.2 above.	As in B.1.1.2 above.
				B.2.1.1	Development of management and monitoring plan according to established HCV maps.																			As in B.1.1.2 above.	As in B.1.1.2 above.
				B.2.1.1	Development of forest restoration / remediation / conservation plan based on HCSA decision																			As in B.1.1.2 above.	As in B.1.1.2 above.
				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 routine community and employee engagement.	On-going as part of routine community and employee engagement.
				B.2.1.2	Demarcation of buffer zones and no-go areas																			On-going	On-going
				B.2.1.3	Conduct field inspections conducted regularly to ensure implementation of mitigation plan																			Inspection on-going. To be reviewed and consolidated subject to final report of HCV-HCS re-assessment, and submission of mitigation plan	Inspection on-going. To be reviewed and consolidated subject to final report of HCV-HCS re-assessment, and submission of mitigation plan
				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.	Completed.
		B.3.1.2	Having well documented IPM implementation records including records of training to IPM workers																		Completed.	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.	Completed.			
B.3.2.2	Tarjuowon North (TNRE) estate/TRJM needs to record how much the total POME application, replace broken flowmeter																				Completed.	Completed.			
B.3.2.3	Building of additional POME pond																					Completed.	Completed.		
B.4	Greenhouse gas emissions	B.4.1	Report and reduce greenhouse gas emissions	B.4.1.1	Conduct assessment of pollution and GHG emission resource from the entire operational aspect.																Completed.	Completed.			
B.4.1.2	Establish action plan to mitigate or reduce the pollution and GHG emission																				Completed.	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.	Done. Iterative process.		
B.5	Waste management	B.5.1	Improve waste management	B.5.1.1	Check BOD and other parameter in POME discharge to plantation refer to regulation.																Done. Iterative process.	Done. Iterative process.			
B.5.1.2	Engage the government about the license/permit for the hazardous warehouse based on the EMPL Regulation Section 64.																					Engagement done. Licencing process under periodic review.	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.	Done. Iterative process.		
B.5.1.4	Have well documented waste management and disposal plan to avoid or reduce pollution.																						Completed.	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.	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.	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																On-going	On-going			
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. Review on-going.	Draft completed. Review on-going.		

