



PALM OIL INNOVATION GROUP - POIG

AGROPALMA MILLS: (CRAI/AGROPAR, AMAPALMA, AGROPALMA, CPA and PARAPALMA)

Tailândia and Acará, Pará, Brazil

POIG Verification Indicators March 2016

Public Summary Report

2017

Lead Auditor: Ingrid Ayub

Surveillance Report: 19th-23rd June 2017

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1. SCOPE OF THE CERTIFICATION AUDIT				
1.1 Normative references				
The Palm Oil Mill and the supply base was audited against the following documents:				
<input checked="" type="checkbox"/> POIG Verification Indicators March 2016.				
1.2 Company and Contact Details				
Company name	AGROPALMA GROUP			
Business address	Alameda Santos, 466 – 10o andar, CEP: 01418-000, São Paulo, Brasil			
Scope	Production of Crude Palm Oil and Palm Kernel from a supply base conformed by own farms and 233 RSPO certified growers/farmers			
Products	Crude Palm Oil (CPO) and Palm Kernel (PK).			
Contact person	Tulio Dias			
Telephone	Tulio Dias Telephone +55 11 2505 6400			
E-mail	tuliodias@agropalma.com.br			
Web site	www.agropalma.com.br			
Other certifications held	DNV: ISO 9001, ISO 14001, OHSAS 18001, ISO 22000 and FSSC 22000. IBD Organic. Ecosocial. JAS organic. BioSuisse, USDA Organic.			
1.3 Audit type				
Date of this audit	June 19th. to 23rd. 2017			
Main or ASA (1 to 4)	ASA 1			
1.4 Location of the Palm Oil Mill				
Palm Oil Mill (POM)	Location Address	Mill Capacity MT/Hour	GPS Reference	
			Longitude	Latitude
Name				
Crai/Agropar Mill	Road PA 150, KM74, Direito - Tailândia, PA – Brasil	72	48°47'47.85°W	2°31'36.34"S
Amapalma Mill	Road PA 150, KM74, Direito - Tailândia, PA – Brasil	60	48°47'49.86°W	2°31'29.59"S
Agropalma Mill	Road PA 150, KM74, Esquerdo - Tailândia, PA – Brasil	60	48°42'17.65°W	2°32'34.06"S
CPA Mill	Rodovia PA 150 Km 50, Esquerdo, Acará – PA - Brazil	24	48°35'11.78°W	2°15'10.54"S
Parapalma Mill	Rodovia PA 150 Km 74, esquerdo. Tailândia, PA. - Brasil	60	48°42'22.41"W	2°32'36.58"S
1.5 General Description of Supply Base				
<p>The FFB supply base for the Agropalma Group mills (Crai/Agropar, Amapalma, Agropalma and CPA mills) comes from Agropalma S.A. own land composed by 8 agricultural sectors, leased land managed by Agropalma S.A. and 233 outgrowers (family farmers and integrated growers), as seen in the table below. All of the abovementioned FFB suppliers are covered by the certificate scope. Currently there are 192 family farmers, divided on 5 projects (I, II, III, IV and V) where each of the families/grower owns from 4 ha to 12.48 ha and 41 integrated outgrowers with oil palm planted areas between 16.65 ha and 1372.75 ha. The Company has commercial long-term contracts with all of them. Some family farmers/growers are organized in associations managed by a board of directors, commanded by a president. Each family farmer is responsible for managing his/her own plantation. Agropalma S.A. provides technical assistance to each of the growers through a team of 13 professionals. Each of the growers is visited at least once a month and receives support in different areas as good agricultural practices, crop management, compliance with legal requirements, monthly price of FFB, compliance with RSPO certification system and standards and others. Through the signed contract each of the growers agree to manage their oil palm plantation according to the agronomic advice given by Agropalma S.A. and in compliance with the RSPO applicable requirements. Any of the mills Crai/Agropar, Amapalma and Agropalma can receive and process FFB from any source of its certified supply base, the assignment of FFB to a mill is determined by Agropalma S.A. personnel in charge of programming the production. CPA mill receives exclusively RSPO certified FFB coming from Agropalma S.A. department VI which is also organic certified as CPA mill produces CPA and PK with double certification (RSPO and Organic). Parapalma Mill receives also FFB from the RSPO certified supply base but also receives FFB from non RSPO certified growers, processing all fruits together without separation on time neither space. Parapalma mill is RSPO MB certified.</p> <p>Outgrowers are located in the localities of Moju, Tomé-Acú and Tailandia as the land owned by Agropalma S.A. is located in Tailandia and land leased by Agropalma and managed by Agropalma S.A. is located in Moju, all of them in the counties of Tailandia and Acará, state of Pará.</p> <p>Note 1: Since January 2017, all agricultural activities as well as the mills belongs to Agropalma S.A. Before January 2017 some of the activities were owned by other legal societies of the same group.</p>				
1.5.1 Location of the Supply Base				
Oil Palm Plantation (OPP)	Location Address	GPS Reference		
		Longitude	Latitude	
Name				
Departamento I	Rodovia PA 150 Km 74, Direito. Tailândia/PA	48° 47'18"	2°31'41"	
Departamento II	Rodovia PA 150 Km 74, Esquerdo. Tailândia/PA	48° 43'50"	2°32'57"	
Departamento III	Rodovia PA 150 Km 74, Direito. Tailândia/PA	48° 49'35"	2°34'47"	

Departamento IV	Rodovia PA 150 Km 94, Direito. Moju/PA	48° 54'15"	2°39'11"
Departamento V	Rodovia PA 150 Km 65, Esquerdo. Tailândia/PA	48° 43'37"	2°29'32"
Departamento VI	Rodovia PA 150, Km 50, Acará/PA	48° 45'10"	2°15'03"
Departamento VII or XV	Rodovia PA 150 Km 74, Esquerdo. Tailândia/PA	48° 34'36"	2°35'48"
Departamento VIII or XVI	Rodovia PA 150 Km 74, Esquerdo. Tailândia/PA	48° 38'44"	2°33'16"
Area Leased from Altino	Moju	48°57'59,24"	2°30'35,74"
192 Family Farmers and 41 Integrated Outgrowers	Tailândia, Moju and Tome-Açú	Several	Several

1.5.2 Statistics of the Supply Base and Estimated Tonnes of FFB produced per year

Name	Area of Oil Palm (Ha)		Estimated Tonnes FFB/Yr	Planting Years	Cycle (Years)
	Total	Production			
Departamento I	4.820	4.820	65.000	2013;2010;1992 1991;1989;1988 1987;1986;1985	25
Departamento II	5.194	5.167	55.000	2013;2012;2010 1999 ;1994; 1993 1992;1991; 1984	25
Departamento III	6.570	6.570	135.000	1999;1999; 1999 7 1996;1995; 1992	25
Departamento IV	4.954	4.954	93.000	2001; 2000; 1999; 1998	25
Departamento V	6.177	5.958	120.000	2011;2010; 2007, 2004; 2002; 2001	25
Departamento VI	4.107	2.989	50.000	2010, 2011, 2000, 2001, 1996, 1990, 1989	25
Departamento VII or XV	4.149	4.149	65.000	2010;2009; 2008; 2006	25
Departamento VIII or XVI	3.090	3.090	60.000	2010;2009; 2008; 2007	25
Area Leased from Altino	505	505	7000	2010; 2005; 2004; 2003; 2000; 1999; 1998	25
Total own plantations	39.566	38.202	650.000	N/A	N/A
Family Farmers and Integrated Outgrowers	8.907	8.020	140.147	2013;2012; 2011; 2010; 2009;2009;20	25

				082009 7;2006 ;2005 2004;2 003;20 02;200 1;2000 ;19991 998;19 86	
TOTAL	48.473	46.222	790.147	-	-
1.5.3 Biodiversity (Total Conservation & HCV Area for the respective Supply Bases)					
Oil Palm Plantation	Biodiversity.(Total Conservation & HCV Area) Hectares.				
Name	Conservation	HVC	Comments		
Departamento I	5.500	5.500	----		
Departamento II	8.398	8.398	----		
Departamento III	4.711	4.711	----		
Departamento IV	5.958	5.958	----		
Departamento V	11.695	11.695	----		
Departamento VI	11.593	11.593	----		
Departamento VII or XV	6.791	6.791	----		
Departamento VIII or XVI	8.578	8.578	----		
Area Leased from Altino	0	0	Area leased cover only palm plantation area.		
Total Company Conservation Area	63.224	63.224			
Family Farmers and Integrated Outgrowers	8.166	8.166	An equivalent area to the oil palm area owned by the three growers that were excluded from the certified growers list for the present audit, was deducted from the conservation area and HCV area reported on the last audit report. The abovementioned fact based on the fact that growers on the area should left 50 % of the land they own under conservation (reserva legal). The excluded growers were José Wanderlee Marques, Valdeci Pigati Salvador and Angelo Claudine Capelozza		
TOTAL	71.390	71.390	-		

2. AUDIT PROCESS

2.1 IBD - The Certification Body

IBD takes pride in being the largest certifier in Latin America and the only Brazilian certifier of organic products with accreditation through IFOAM (international market), ISO Guide 65 (European market regulation CE 889/07), Demeter (international market), USDA/NOP (North-American market), COR (Canadian market) and INMETRO/MAPA (Brazilian market), making its certificate global.

Located in Botucatu-SP, Brazil, IBD has been in operation since 1992. Initially focused exclusively on the certification of organic product, after 2004, IBD began including certification services in the social-environmental area through the EcoSocial, Integra, RSPO and UEFT (*Union for Ethical BioTrade*) programs. Today, IBD certifies over 5,000 producers, covering an area of approximately 520 thousand hectares in cultivation and 3 million hectares under wild harvest management, throughout 16 countries.

For more information regarding IBD Certificações, access www.ibd.com.br. RSPO Membership N°: 8-0090-08-000-00. RSPO accredited by ASI on November 4th, 2014, worldwide (accreditation code RSPO-ACC-020).

2.2 Audit Team

Lead auditor	Ingrid Ayub (I.A.)
Audit team	Ana María Uribe (A.U.)
	Dina Medem (D.M.)
	Andressa Keller (A.K.)
	Mauricio Malvoni (M.M.)
	Nazareth Rocha (translator)

2.3 Audit Methodology

MQ III IBD Revisão 16.03.2015

GED/DOCUMENTOS/MODELOS E REFERENCIAS/2-SETOR DE INSPECÇÕES/2_2-RELATÓRIOS DE INSPEÇÃO/2_2_30_1_3_En – RSPO P&C Public Summary Report

2.3.1 Audit Agenda				
Date	Time	Location	Program	Auditor(s)
19/06/17	9:00 a.m.	Agropalma S.A. offices, Tailandia/PA	Opening meeting	I.A., A.U., D.M., A.K., M.M.
19/06/17	10:00 a.m.-6:00 p.m.	Agropalma S.A. offices, Tailandia/PA	Documental Review: I.A. (SCC); A.U. (RSPO P&C P.1 and P. 6 /selected criteria); D.M. (RSPO P&C criterion 2.1 and P. 6 /selected criteria); A.K. (RSPO P&C criterion 4.7 and visit to medical center); M.M. (RSPO P&C P. 4 except criterion 4.7)	I.A., A.U., D.M., A.K., M.M.
20/06/17	7:00 a.m.-6:00 p.m.	Agropalma S.A. offices; localities of Tailandia, Palmares, Arauaí and Turi Acu /PA; Amapalma mill, Agropalma Departments 1 and 5.	I.A. (documental review SCC); A.U. (visit and interviews with stakeholders); D.M. (morning at Amapalma mill - RSPO standards / afternoon: continuation of documental review RSPO P&C P.2 and 6); A.K. (morning at Agropalma Department 1 - RSPO P&C standard / afternoon: documental review criteria 3.1, 4.7, 4.8); M.M. (morning at Agropalma Department V - RSPO P&C standard / afternoon: Agropalma Group facilities: pesticide storage, storages, laundry, changing rooms, warehouses and others).	I.A., A.U., D.M., A.K., M.M.
21/06/17	7:00 a.m.-6:00 p.m.	Agropalma S.A. offices; Agropalma mill; CPA mill; growers farms in Moju and Tailandia; Agropalma Department 3.	I.A. (morning at Agropalma mill - Parapalma mill complex - RSPO SCC and P&C standards / afternoon: documental review RSPO P&C criteria 5.2, 5.5 and P.7); A.U. (visit to 7 growers in Moju); D.M. (morning at Agropalma Department III) RSPO P&C standard / afternoon: continuation of documental review RSPO P&C P.2 and 6); A.K. (visit to 3 growers in Moju and 2 growers in Tailandia); M.M. (morning continuation of documental review P.4 and criterion 8.1 / afternoon: CPA mill)	I.A., A.U., D.M., A.K., M.M.
22/06/17	7:00 a.m.-6:00 p.m.	Agropalma S.A. offices and facilities; growers farms in Tomé-Acú and Tailandia)	All: meeting with Agropalma sustainability responsables to coordinate delivery of missing information. I.A. (visit to two growers in Tomé-Acú); A.U. (visit to two growers in Tomé-Acú); D.M. (visit to 1 grower in Tomé-Acú together with I.A. and at midday transfer to Belem); A.K. (morning : Interviews to mill and farm service providers, afternoon: documental review of criteria 5.3, 5.4 and 6.8.1); M.M (visit to three growers in Tailandia).	I.A., A.U., D.M., A.K., M.M.
23/06/17	7:00 a.m.-3:30 p.m.	Agropalma S.A. offices and Agropalma S.A. office in Belem	All: meeting with Agropalma sustainability responsables to coordinate delivery of missing information. I.A. (documental review criteria 5.2 (continuation) and 5.6); A.U. (review of stakeholders' comments and gather of auditee opinion); D.M. (morning: documental review of criterion 2.2 in Belem office); A.K. (documental review of criterion 5.1 and indicators 6.13, 4.6.11 and 4.6.12); M.M. (gathering of missing information in general).	I.A., A.U., D.M., A.K., M.M.
23/06/17	4:00 p.m.	Agropalma S.A. office	Pre- closing meeting.	I.A., A.U., D.M., A.K., M.M.
Note: auditors meetings and preparation of closing meeting were done at night and are not contemplated in this auditors agenda. Closing meeting was performed Saturday morning (24/06/2017) as previously agreed with the auditee and could be seen on the audit plan.				
24/06/17	7:00 a.m.	Agropalma S.A. offices	Closing meeting	I.A., A.U., D.M., A.K., M.M.
2.3.2 Outline of how stakeholders consultation was managed.				

A meeting was held between selected stakeholders and the RSPO auditor responsible for stakeholder consultation on July 20th. 2017, according to the audit plan. The auditor traveled to meet the stakeholders in their places of work. Interviews were made without Agropalma S.A. personnel to guarantee free expression and some of the interviews were performed with the presence of a single stakeholder as others were performed in group. During interviews it was evidenced the agreeable relationship between AGROPALMA and the consulted stakeholders.

2.3.3 Issues that arose during stakeholder consultation and company responses.

Subject raised	Company response and proposed action to be taken.	Audit team findings
<p>"Representante dos Moradores do Turi-Açu" (residents association) gave a positive input regarding "Agropalma" activities and mentioned there are several contributions (economic and social) as employment generation and technical support in different areas.</p> <p>However, members of the community expressed concern regarding rivers contamination by agrochemicals used.</p>	<p>Agropalma personnel manifested the need of complains to be expressed by written means as required by the procedure. In case there is a complaint Agropalma performs inspections to possible affected zones together with complainers to verify the information. On most occasions, complaints do not transcend due that they are simple rumors.</p> <p>Agropalma performs periodical nitrogen and phosphorus analysis to river and igarapes waters in 8 sample points. For 2017 analysis results dated February 2017 shows no detection of phosphorus in any of the 8 sample points and nitrogen results are below 2.9 for all samples when maximum accepted values are 3.7 according to CONAMA 357/2005.</p>	<p>Data verified during audit. The auditor doesn't consider that AGROPALMA should generate a corrective action.</p>
<p>The director "dos Assalariados dos Trabalhadores Rurais de Tailândia" (Tailândia Rural Paid Workers)- Vila Dos Palmares manifested that it is very positive the relationship with AGROPALMA. Great benefits have been achieved for more than 4000 associates :half working day on Saturday, food subsidy, hairstyle bonus, transport from home to work, improvements on salary, progressive production bonus, transition bonus, health service and others.</p>	<p>Positive input. No action Required.</p>	<p>Positive input. No action required.</p>
<p>Members of the "Associação dos Moradores da Vila dos Palmares" / residents association manifested that the relationship with AGROPALMA is very positive. Many Palmares Vila inhabitants are AGROPALMA's workers. AGROPALMA is a big employment generator and make economics and social contributions to the Vila.</p>	<p>Positive input. No action required.</p>	<p>Positive input. No action Required.</p>
<p>The director of São Felipe School manifested that the relationship with AGROPALMA is very positive. AGROPALMA has the young apprentice program that benefits many young community members and also make economic contributions. There are 3000 students.</p>	<p>Positive input. No action required.</p>	<p>Positive input. No action required.</p>
<p>The director of Agropalma school manifested that the relationship with Agropalma is very positive.</p>	<p>Positive input. No action required.</p>	<p>Positive input. No action required.</p>

<p>Agropalma assumes all functioning costs: workers, dining room, transport and teaching materials. It currently has 680 students.</p>		
<p>The director of the health center at Palmares Vila manifested that the relationship with Agropalma is very positive. However, manifested that any additional help that Agropalma could deliver will be of great help.</p>	<p>Positive input. No action required.</p> <p>The auditee evidenced the social contributions it makes. However, Agropalma manifested that the health center is under the government responsibility.</p>	<p>Positive input. No action required.</p>

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PART 3. VERIFICATION AUDIT FINDINGS			
3.1. Summary of Findings			
POIG requirement	Proposed additional POIG indicators	Result of IBD assessment	Evaluation
**NOTE: The major Indicators for each section are highlighted in red			
1. Environmental Responsibility			

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<p>1.1 High Carbon Stock and High Conservation Values</p> <p>The link between oil palm expansion and deforestation will be broken through undertaking a High Carbon Stock (HCS) approach in addition to a High Conservation Value (HCV) assessment, and a process of obtaining Free, Prior and Informed Consent to use land. The approach combines biodiversity and carbon conservation, as well as social considerations (including community needs)</p>	<p>1.1.1 Prior to establishing new plantations or expanding existing ones¹, in addition to or integrated with a HCV assessment, a HCS approach which combines biodiversity, carbon conservation and social considerations (including community needs) has been conducted.</p>	<p>Agropalma performed an evaluation of High Conservation Values for its own land and certified supply base growers land : Availacao de Areas de Altos Valores de Conservacao (AVC). Relatório Executivo de Availacao de AVC em Escalada da Paisagem Agropalma S.A., Tailandia, Janeiro 2015, realizado por ORBIS Exceller. The study includes own Agropalma land as well as certified supply base growers land. The study was under the responsibility of Arthur Wieczorek, licencia ALS Provisional N. ALS14003AW. Agropalma owns 107 000 ha from which 39 000 hectares are planted with oil palm and 64 000 hectares are conservation areas (forest reserves)</p> <p>Study results identifies 4 potential HCV s: HCV 1: 56 endangered species; HCV 3: natural areas “ campineras”; HCV 5: igarapés and springs and HCV 6: archeological sites. There is also a present HCV identified: HCV 4: APP (permanent preservation areas).</p> <p>The study presents on table 9.1 the summary of proposed management plans, actions and monitoring activities for the potential and present HCV identified on the area.</p> <p>On section 2.2.9. Cultural and Social Values of the zone are described. The region of influence is circulated by some rural nuclei in the form of small settlements and recent occupations. There are no quilombos or indigenous communities located in the area of influence of the tierra.</p> <p>In section 3.5.1. Estoque de Carbono pela Mudanca De Uso da Terra-MUT, there is detail of the analyzed áreas for conversion expressed in t C/ha. The carbon storage values as a function of land use change are entered into the Palm Calculator, on the industry área, to estimate a change in value projection for land use change. On table 8 (page 43) values are presented considering land conversion. Carbon stock values on converted land is 133,63 t C/Total. For area 1 that has a “capoeira baja” and pastures it is of</p>	<p>Complies</p>
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PART 3. VERIFICATION AUDIT FINDINGS			
3.1. Summary of Findings			
POIG requirement **NOTE: The major Indicators for each section are highlighted in red	Proposed additional POIG indicators	Result of IBD assessment	Evaluation
		<p>19.81 t C/ha and on área two that has only “capoeira baja “ cover the value is of 23 t C/ha.</p> <p>HCS Approach methodology was not used considering that the previous rural activity in the area intended to be planted was nonnative vegetation (pasture).</p>	

PART 3. VERIFICATION AUDIT FINDINGS			
3.1. Summary of Findings			
POIG requirement **NOTE: The major Indicators for each section are highlighted in red	Proposed additional POIG indicators	Result of IBD assessment	Evaluation
	1.1.2 HCS forest areas are identified and mapped.	<p>"It has been found through evaluation study of the analysis of environmental impacts (AISA), high conservation values (AVC), stock of carbon and balance emissions of greenhouse gases (GHG) by Orbis Exceller company in December / 2015 in item 7.2 "Land Cover Change between 2006 -2015 in the areas of new developments." Table 7.2 shows what had on this producer in 2006 and 2015 Figure 7.7 - cover change map between 2006 and 2015 for this producer. As observation is reported in the study that was not made satellite imagery analysis for this producer due to the bad quality of the image.</p> <p>Beyond that, for all Agropalma fields the HCS forest are mapped and identified." The text above is from the 2016 POIG audit report. Information from the POIG 2016 report was validated during the 2017 audit.</p>	Complies
	1.1.3 After March 2014 no new plantings take place in HCS forest areas identified for conservation.	No new plantings have occurred after March 2014 in any type of forested areas.	Complies
	1.1.4 Community participatory mapping has identified and mapped garden and future farmlands that are fundamental to meeting their basic food needs over the license period of the plantation, and excluded them from being considered HCS forest	The areas where the producers will establish new plantations are private farms where customary rights have not been identified.	N/A
	1.1.5 HCS forest areas are actively conserved as part of a community participatory land use plan including FPIC, and an integrated conservation and land use plan (that includes HCV areas, riparian zones, and peat land areas).	The areas where the producers will establish new plantations are private farms where customary rights have not been identified.	N/A

PART 3. VERIFICATION AUDIT FINDINGS			
3.1. Summary of Findings			
POIG requirement **NOTE: The major Indicators for each section are highlighted in red	Proposed additional POIG indicators	Result of IBD assessment	Evaluation
	1.1.6 A summary report of the HCS assessment including maps is made public.	<p>There are SEIA for proposed new planting areas for AGROPALMA own land as well as for growers that supply FFB to AGROPALMA. The SEIA includes a summary of the results of HCS for those proposed area and are available at the HCV Resources Network webpage.</p> <p>Novos Plantios-NPP RELATÓRIO EXECUTIVO DE AVILACAO DE IMPACTOS SOCIOAMBIENTAIS (AISA), ALTOS VALORES DE CONSERVACIÓN (AVC), MUDANCA DE USO DA TERRA, EMISSOES DE GASES DO EFEITO ESTUFA (GEE) E PLANOS DE GESTAO DE NOVAS ÁREAS DE DESENVOLVIMENTO DA AGROPALMA S.A. AGROPALMA-PARÁ-BRASIL Maio de 2017. ORBIS EXCELLER. Versión en portugesse 77 páginas. Arthur Wieczorek. HCVRN-ALS.</p> <p>In section 3.5.1. Estoque de Carbono pela Mudanca De Uso da Terra-MUT, there is detail of the analyzed areas for conversion expressed in t C/ha. The carbon storage values as a function of land use change are entered into the Palm Calculator, on the industry área, to estimate a change in value projection for land use change. On table 8 (page 43) values are presented considering land conversion. Carbon stock values on converted land is 133,63 t C/Total. For area 1 that has a “capoeira baja” and pastures it is of 19.81 t C/ha and on área two that has only “capoeira baja “ cover the value is of 23 t C/ha.</p>	Complies

<p>1.2 Peatland</p> <ul style="list-style-type: none"> • No peat clearance: All areas of undeveloped peat lands (peat of any depth) are protected and all drainage, fires or road building on peat soils is prohibited. • Maintenance of peat lands: Water tables are managed in existing plantations on peat in order to minimise both the subsidence of the peat and the release of GHG emissions. Strategies are employed to progressively restore critical peat land ecosystems, with a preference for replanting on mineral soils, including via 'land swaps'. 	<p>1.2.1 Undeveloped areas of peat land (of any depth) are not developed or drained.</p>	<p>There is no peat land on the area.</p> <p>There are two recent studies performed in 2017:</p> <p>1. Novos Plantios-NPP RELATÓRIO EXECUTIVO DE AVILACAO DE IMPACTOS SOCIOAMBIENTAIS (AISA), ALTOS VALORES DE CONSERVACIÓN (AVC), MUDANCA DE USO DA TERRA, EMISSOES DE GASES DO EFEITO ESTUFA (GEE) E PLANOS DE GESTAO DE NOVAS ÁREAS DE DESENVOLVIMENTO DA AGROPALMA S.A. AGRPALMA-PARÁ-BRASIL Maio de 2017. ORBIS EXCELLER. Versión en portuguese 77 páginas. Arthur Wieczorek. HCVRN-ALS.</p> <p>2- Relatório Executivo de Avaliação de Impactos Socioambientais (AISA), Altos Valores de Conservação (AVC), Mudança de Uso da Terra, Emissões de Gases do Efeito Estufa (GEE) e Planos de Gestão de Novas Áreas de Desenvolvimento de Produtores Integrados Parceiros da Agropalma S.A." Agropalma S.A. Tailândia- Pará, Brasil. Maio 2017. Report made by ORBIS EXCELLER. Arthur Wieczorek. HCVRN-ALS.</p> <p>On both studies there is reference to soils and topography. There are no excessive gradients on the area as the land is flat and varies between 25 to 50 meters over sea level. There are no peat soils on the area as shown on soil maps (page 17/77 for Agropalma S.A. own land figure 2.14 mapa de solos, pagina 27, for growers).</p>	<p>N/A</p>
	<p>1.2.2 Fires and road-building on peat soils are prohibited.</p>		<p>N/A</p>

PART 3. VERIFICATION AUDIT FINDINGS			
3.1.Summary of Findings			
POIG requirement **NOTE: The major Indicators for each section are highlighted in red	Proposed additional POIG indicators	Result of IBD assessment	Evaluation
	1.2.3 Where there is existing planting on peat, critical peat land ecosystems are identified and assessed for restoration opportunities.		N/A
	1.2.4 Based on the results of the assessment above (1.2.3), peatland restoration strategies that are time-bound and expert reviewed are developed and implemented, including those to replant on mineral soils using 'land swaps'.		N/A
	1.2.5 For existing plantings on peat, records show that the water table is maintained (at an average of 50cm (between 40 - 60cm) below ground surface measured with groundwater piezometer readings, or an average of 60cm (between 50 - 70cm) below ground surface as measured in water collection drains) through a network of appropriate water control structures e.g. weirs, sandbags, etc. in fields, and water gates at the discharge points of main drains (RSPO Criteria 4.4 and 7.4).		N/A
	1.2.6 Where drainability assessments have identified areas unsuitable for oil palm replanting, including the likely GHG emissions associated with continued cultivation, plans should be in place for appropriate rehabilitation or alternative use of such areas. If the assessment indicates high risk of GHG emissions, fires, flooding and/or saltwater intrusion, growers cease replanting and implement rehabilitation.		N/A
	1.2.7 A report will be made public that includes assessments and maps of all peat lands (of any depth) within the company land bank, critical peat land ecosystems, planted peat lands, and degraded or planted areas identified for peat land restoration.		N/A

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3.1. Summary of Findings			
POIG requirement **NOTE: The major Indicators for each section are highlighted in red	Proposed additional POIG indicators	Result of IBD assessment	Evaluation
1.3 Greenhouse gas (GHG) accountability Companies shall publicly report on annual GHG emissions from all sources and on the progress towards reaching targeted reductions of non-land use GHG emissions (per ton of CPO).	1.3.1 All sources of GHG emissions, including those related to land use and non-land use activities, are identified and monitored using the RSPO Palm GHG methodology or equivalent.	Even though there is use of the Palm Calculator version 3.01, the data for all integrated growers are reported as a single input (an estimated data for the totality of growers together instead of a data for each of the 233 growers) for each of the parameters to be evaluated. The auditee personnel manifested that there is only one data for the totality of the 233 outgrowers due that they are the only FFB supplier to the mills. Additionally, there is only one input for the 5 mills grouped together. It should be noted that outgrowers plantations varies from 4 ha to 1372.75 ha of oil palm and agricultural practices varies accordingly.	Complies
	1.3.2 Targeted reductions of non-land use related GHG emissions (per ton of CPO) and/or targeted adoption of technologies or techniques which reduce global emissions of CO ₂ eq are defined and documented.	“The new effluent treatment plant at Parapalma and Agropalma mills was established as a strategy to reduce the emission of gas emissions and is informed in the 2015 sustainability report. Up to now, considering the changes that are being implemented Agropalma did not establish a target value of GHG reduction. However, it has established targets for adoption of technologies to reduce GHG (www.agropalma.com.br/en/social-andenvironmentalresponsibility/policies/greenhouse-gases management).” The text above is the text present at the POIG 2016 report and its content was validated during the 2017 audit.	Complies

PART 3. VERIFICATION AUDIT FINDINGS			
3.1. Summary of Findings			
POIG requirement **NOTE: The major Indicators for each section are highlighted in red	Proposed additional POIG indicators	Result of IBD assessment	Evaluation
	1.3.3 Annual GHG emissions from all sources and progress towards the targets documented in 1.3.2 are publicly reported.	In the latest Agropalma 2015 sustainability report published on its website (Http://www.agropalma.com.br/arquivos/relatorios/Relatorio_Sustentabilidade_2015_Portugues-1480095831.pdf) is informed in the item "Fight climate change" all existing emissions related to Agropalma's agricultural and industrial activities. In addition, the emissions generated are reported annually through the ACOP report sent to RSPO (http://www.rspo.org/file/acop2015/submissions/agropalma%20group-ACOP2015.pdf)." POIG 2016 Report. Information from the POIG 2016 report was validated during the 2017 audit.	Complies
1.4 Pesticide use minimisation Highly toxic, bio-accumulative and persistent pesticides shall not be used. These include chemicals on the FSC 'Highly Hazardous' list and SAN prohibited pesticide list. Producers shall preference practice natural weed and pest control and IPM, and strive to avoid the use of toxic pesticides, only using them as an absolute	1.4.1 Highly toxic, bio-accumulative and persistent pesticides (PBT) are prohibited. This includes chemicals listed by the following: a) World Health Organisation Class 1A or 1B, Stockholm or Rotterdam Conventions, b) FSC 'Highly Hazardous' list, c) SAN prohibited pesticide list and d) Paraquat	"Based on the implemented IMP program and evaluated documents, weed control and pest control are technically done using Round UP (Glyphosate), and Dipel (Bacillus thuringiensis) respectively. Palm Oil weevils (i.e. Ryncosporum palmarum) control is done by pheromone placing in mechanical traps." POIG 2016 Report Information from the POIG 2016 report was validated during the 2017 audit.	Complies

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3.1. Summary of Findings			
POIG requirement **NOTE: The major Indicators for each section are highlighted in red	Proposed additional POIG indicators	Result of IBD assessment	Evaluation
last resort. There shall be full transparency of any pesticide use.	1.4.2 The grower preferences natural weed and pest control and IPM.	<p>Currently, the use of pesticides for pest and disease control is based on biological products and pheromone traps, except weed control where herbicides are applied. In the case of Agropalma s own land the application devices are tractors and there is no aerial spraying. Weed control alternates application of herbicides in alternate lines and brushing and manual crowning in palms. Herbicide applications are not carried out in areas near water courses.</p> <p>All interviewed workers who are involved in application of herbicides and organic products have training certificates in secure handling of agrochemicals by SENAR and make use of PPE as recommended by the health and safety at work management plan.</p>	Complies
	1.4.3 Emergency use of listed pesticides is permitted subject to POIG Organising Committee approval.	Agropalma does not use any kind of prohibited pesticides.	N/A
<p>1.5 Chemical fertiliser To reduce climate and environmental impacts producers shall strive to minimise chemical fertiliser use, and preferentially use 'precision agriculture', organic fertilisers, and where possible use waste as a source of phosphorus. Phosphorus and nitrogen levels in water courses are monitored and disclosed.</p>	1.5.1 Use of chemical fertilisers is minimised through producers demonstrating preferential use of alternatives to manage soil fertility.	<p>Soil fertilization minimizes the use of chemical / synthetic inputs. At farms, mainly biomasic fertilizers are used, including the following:</p> <ul style="list-style-type: none"> ➤ EFB ➤ Palm Kernel Cake ➤ Fiber ➤ Rind ➤ Effluents for Fertigation <p>Beyond that, there is use of green fertilizers as <i>Pueraria</i> sp. which is planted as a soil coverage in oil palm plantations.</p>	Complies

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3.1.Summary of Findings			
POIG requirement **NOTE: The major Indicators for each section are highlighted in red	Proposed additional POIG indicators	Result of IBD assessment	Evaluation
	1.5.2 Phosphorus and nitrogen levels in relevant watercourses are monitored and when the results of monitoring indicate an increased level of such elements in water due to fertiliser application, company will adjust fertiliser rates and procedures.	<p>It was verified that, once a year, the river courses located in areas of influence of Agropalma Group are monitored at eight sampling points.</p> <p>Phosphorus and Nitrogen analysis Agropalma S.A. measures Phosphorus and Nitrogen on superficial water courses. It counts with a map that includes latitude and longitude of 8 sample points, 7 of them within the boundaries of Agropalma own land. Evidence: DOC N. 2016.12.19.01. Date :09/02/2017. Relatorio de Ensaio Universo Amazonas Consultoria e Analisis Ambientais. Resultado: Coordenadas 2° 35 29.16" S and 48°45 9.12" O Fósforo total: non detected; Nitrogeno amoniacal total: 0,60 (limite < 3.7) Results of total Phosphorus and total amoniacal Nitrogen on other sample points (Docs N. 2016.12.19.02, 2016.12.19.03, 2016.12.19.04, 2016.12.19.05, 2016.12.19.06, 2016.12.19.07, 2016.12.19.08) are all within accepted limits by Resolucao CONAMA 357 /2005.</p>	Complies
	1.5.3 Results of phosphorous and nitrogen monitoring in water courses are included in public reporting.	<p>Agropalma publishes the Phosphorus and Nitrogen analysis results in the sustainability report that is published every two years.</p> <p>The last published report is AGROPALMA : RELATORIO DE SUSTENTABILIDADE 2015, report that can be downloaded in the Agropalma Group webpage.</p> <p>(Http://www.agropalma.com.br/arquivos/relatorios/Relatorio_Sustentabilidade_2015_Portugues-1480095831.pdf).</p>	Complies

MQ III IBD Revisão 16.03.2015

GED/DOCUMENTOS/MODELOS E REFERENCIAS/2-SETOR DE INSPEÇÕES/2_2-RELATÓRIOS DE INSPEÇÃO/2_2_30_1_3_En – RSPO P&C Public Summary Report

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3.1. Summary of Findings			
POIG requirement **NOTE: The major Indicators for each section are highlighted in red	Proposed additional POIG indicators	Result of IBD assessment	Evaluation
1.6 GMOs prohibition The cultivation of GMOs in the management area is prohibited.	1.6.1 The use of GMOs in the management area is prohibited.	It was verified that Agropalma does not plant any kind of GMO crops.	Complies

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POIG requirement **NOTE: The major Indicators for each section are highlighted in red	Proposed additional POIG indicators	Result of IBD assessment	Evaluation
<p>1.7 Water accountability</p> <p>The quality and quantity of water is maintained with responsible water management adopted including minimisation and disclosure of water use, pollution elimination, equity with other users, and consideration of catchment level impacts of irrigation.</p>	<p>1.7.1 Water use, consumption and pollution by plantation operations and mills are monitored.</p>	<p>Monitoramento do consumo de água por tonelada de CFF, atualizado em 22/06/2017. Os registros são realizados diariamente através da leitura diária pelo setor responsável de cada indústria e os registrados são mantidos atualizados. Período avaliado: Agosto/2016 – Maio/2017</p> <p>CRAI /AGROPAR, CFF processado: 148.195,423 toneladas Consumo de Água: 118.676,280 m³ Relação: 0,80 m³/ton.</p> <p>AMAPALMA CFF processado: 197.086,917 toneladas Consumo de Água: 211.077,100 m³ Relação: 1,07 m³/ton.</p> <p>AGROPALMA CFF processado: 178.119,763 toneladas Consumo de Água: 142.888,170 m³ Relação: 0,80 m³/ton.</p> <p>PARAPALMA CFF processado: 209.662,210 toneladas Consumo de Água: 216.005,360 m³ Relação: 1,03 m³/ton.</p> <p>CPA CFF processado: 40.143,242 toneladas Consumo de Água: 23.543,000 m³ Relação: 0,59 m³/ton.</p> <p>DBO and Oils and Fats Analysis (POME) Monitoramento e análises de DBO para os efluentes das indústrias de extração. Efluentes emulsionado – tratamento usado na fertirrigação e água das caixas separadoras são lançadas no igarapé com análise de DBO. Verificado planta do projeto de efluentes.</p>	<p>Complies</p>

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3.1. Summary of Findings			
POIG requirement **NOTE: The major Indicators for each section are highlighted in red	Proposed additional POIG indicators	Result of IBD assessment	Evaluation
	<p>1.7.2 The water management plan includes targets and measures to minimise and/or reduce water use, consumption, and pollution, including in both plantations and mills</p>	<p>There is a Water Management Plan NPG-029, revisão 01, data 26/04/2016, folha 1/5 – Plano de de Manejos dos Recursos Hídricos. The Water Management Plan and other related documents considers required permits, water consumption monitoring, measures to diminish consumption, monitoring of the quality of effluents.</p> <p>Poços: consumo humano e industrial Captação de águas superficiais: irrigação de mudas de palma e experimento de cultivo de palma irrigada.</p> <p>NPG-018 – Controle e monitoramento de resíduos e subprodutos sólidos e emissões, qualidade hídricas e atmosféricas.</p> <p>RO-GE-MAMB 004 – Monitoramento de efluentes líquido, solos e sedimentos e sedimentos e qualidade das águas fluviais e subterrâneas.</p> <p>To see data related to water consumption at each of the five mills please see text on indicator 1.7.1.</p>	<p>Complies</p>

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3.1. Summary of Findings			
POIG requirement **NOTE: The major Indicators for each section are highlighted in red	Proposed additional POIG indicators	Result of IBD assessment	Evaluation
	1.7.3 Water use, consumption and pollution by plantations and mills are included in public reporting.	<p>Agropalma publishes data related with water use, consumption and pollution in the Sustainability Report which can be downloaded from the Agropalma Group webpage (www.agropalma.com.br). The Sustainability Report is published / updated every two years.</p> <p>The last published report is AGROPALMA : RELATORIO DE SUSTENTABILIDADE 2015. (Http://www.agropalma.com.br/arquivos/relatorios/Relatorio_Sustentabilidade_2015_Portugues-1480095831.pdf) where information regarding water consumption and pollution can be consulted at pages 36 to 40.</p>	Complies
	1.7.4 A water stewardship assessment is undertaken involving relevant stakeholders to address water equity issues.	<p>Agropalma has not addressed the water equity issue in consultancy with relevant stakeholders. The sustainability personnel manifested that no actions have been taken on this matter.</p> <p>The non-conformity is present in the 2016 POIG report and is kept open during the 2017 POIG report.</p>	Does not comply

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3.1. Summary of Findings			
POIG requirement **NOTE: The major Indicators for each section are highlighted in red	Proposed additional POIG indicators	Result of IBD assessment	Evaluation
<p>1.8 Protect and conserve wildlife</p> <p>Following comprehensive biodiversity surveys to identify HCV 1-3, in addition to ensuring the protection and survival of all rare, threatened or endangered species within their concession land, concession holders also make a positive contribution to their survival in the wild in areas beyond the concession.</p>	<p>1.8.1 Comprehensive biodiversity surveys to identify HCV 1-3 have been undertaken.</p>	<p>Agropalma performed an evaluation of High Conservation Values for its own land and certified supply base growers land : Availacao de Areas de Altos Valores de Conservacao (AVC). Relatório Executivo de Availacao de AVC em Escalada da Paisagem Agropalma S.A., Tailandia, Janeiro 2015, realizado por ORBIS Exceller. The study includes own Agropalma land as well as certified supply base growers land. The study was under the responsibility of Arthur Wiczorek, licencia ALS Provisional N. ALS14003AW. Agropalma owns 107 000 ha from which 39 000 hectares are planted with oil palm and 64 000 hectares are conservation areas (forest reserves)</p> <p>Study results identifies 4 potential HCV s: HCV 1: 56 endangered species; HCV 3: natural areas “ campineras”; HCV 5: igarapés and springs and HCV 6: archaeological sites. There is also a present HCV identified: HCV 4: APP (permanent preservation areas)..</p> <p>The study evaluation of High Conservation Values Agropalma S.A. from January 2015, presents on table 9.1 the summary of proposed management plans, actions and monitoring activities for the potential and present HCV identified on the area.</p>	<p>Complies</p>

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POIG requirement **NOTE: The major Indicators for each section are highlighted in red	Proposed additional POIG indicators	Result of IBD assessment	Evaluation
	1.8.2 Management plans for all rare, threatened or endangered species include actions for their protection, survival, and prevention of poaching, in the landscape outside the management area.	<p>With respect to the Flora and Fauna monitoring program, Agropalma S.A. signed a contract on April 15th., 2016 with Conservación Internacional de Brasil, which has as one of the objectives (objetivo 1.1.) Biodiversity Monitoring. Between the expected products there is a yearly biodiversity diagnostic analysis / sistematic reports on biodiversity monitoring.</p> <p>On June 9th., 2017, through e mail, Agropalma S.A. received the first biodiversity report : Relatorio Año 1, Junio 2017, Monitoreamento de Biodiversidade, send by Luis Piva to Joao Martins. The report includes collected data in 2015 and 2016 for the microrregión of Tomé Acu and includes fish, birds, amphibians, aquatic insects, flies, ants and wasps.</p>	Complies
	1.8.3 The RTE management plan takes into consideration traditional hunting by communities outside the management area and includes specific activities to contribute to the protection and survival of RTE species affected by hunting.	<p>“Agropalma develops actions to prevent any type of hunting activity together with its palm suppliers through guiding books, training, visits and a contractual instrument signed by all.” POIG 2016 Report. Information from the POIG 2016 report was validated during the 2017 audit.</p>	Complies

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3.1. Summary of Findings			
POIG requirement **NOTE: The major Indicators for each section are highlighted in red	Proposed additional POIG indicators	Result of IBD assessment	Evaluation
<p>2.1 Free, Prior and Informed Consent</p> <p>“Comprehensive FPIC is obtained for all oil palm development including in particular: full respect for their legal and customary rights to their territories, lands and resources via local communities own representative institutions, with all the relevant information and documents made available, with resourced access to independent advice, through a documented process, through a long-term two-way process of consultation and negotiation where the communities are informed and understand that saying no to development is an option, and not constrained by local legal frameworks. Newly acquired already planted plantation areas shall redress any lack of proper FPIC when the plantations were established. Lands will not be acquired through expropriations in the national interest (‘eminent domain’).”</p>	<p>2.1.1 Resourced access to independent expert advice is offered at each stage of an FPIC or conflict resolution process to affected communities.</p>	<p>Agropalma never bought, acquired or used land that belonged to traditional communities or indigenous peoples. There have been no conflicts for land with traditional communities or indigenous people.</p> <p>The new planting areas under study are located on Agropalma S.A. own land and integrated growers own land purchased through purchase and sale deeds. No customary or users' rights has been detected.</p>	N/A
	<p>2.1.2 Processes of consultation and negotiation, in accordance with internationally recognized FPIC standards, are not constrained by local legal frameworks.</p>	<p>Agropalma never bought, acquired or used land that belonged to traditional communities or indigenous peoples. There has been no conflicts for land with traditional communities or indigenous people.</p> <p>The new planting areas under study are located on Agropalma S.A. own land and integrated growers own land purchased through purchase and sale deeds. No customary or users' rights has been detected</p>	N/A
	<p>2.1.3 When acquiring land or replanting existing plantations, measures are taken to redress any issues arising from the lack of or inadequate FPIC processes carried out when those plantations were established. In such cases, participatory surveys will be conducted to identify HCV's 4, 5 and/or 6 that existed before the plantation was established.</p>	<p>“There is no history of purchasing areas after implementation of the POIG standard. For the activities of replanting it was verified that there are no questions related to FPIC's processes carried out in the past and therefore there is no reference that can be made in this sense. Land acquisitions were made, in the past, directly from private farmers, individually with each producer, and negotiations covered by the law.” The text above is the text present at the POIG 2016 report and its content was validated during the 2017 audit.</p>	N/A

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3.1. Summary of Findings			
POIG requirement **NOTE: The major Indicators for each section are highlighted in red	Proposed additional POIG indicators	Result of IBD assessment	Evaluation
	2.1.4 Plantations have not been developed on land acquired through expropriations in the national interest (eminent domain) after March 2014.	Agropalma acquired its land from individuals through public purchase deeds. A sample of public purchase deeds was reviewed.	Complies

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POIG requirement **NOTE: The major Indicators for each section are highlighted in red	Proposed additional POIG indicators	Result of IBD assessment	Evaluation
2.2 Food security As part of the Free Prior Informed Consent process, participatory Social Impact Assessments and participatory land use planning with indigenous and local communities, food security is maintained or strengthened in order to maintain their land use choice and future food security options. This will include not undermining local control of and diversity of food production systems. There is transparency of the land allocation process.	2.2.1 Food security for workers, smallholders, and indigenous and local communities affected by existing plantations is assessed and included in a social management plan. The scope of the food security assessment includes the additional impacts that oil palm production operations may have, including on land, water, labour and infrastructure as well as substitutability between income generation for food purchase and subsistence food production of workers, smallholders and affected communities	<p>Agropalma provides meals to its workers at work in the dining room or at the field stations. Agropalma, aiming to improve the quality of meals delivered to workers recently switched the food service provider contracting SODEXCO. SODEXCO has nutritionist professionals that design balanced menus for the workers. SODEXCO takes to the field stations breakfast and lunches for field workers which are delivered at the adequate temperature. Workers manifested that they receive balanced and sufficient food.</p> <p>Regarding smallholders Social Impact Studies performed by AGROPALMA since 2008 has not identified food security as a problem faced by nearby communities neither as an impact of the AGROPALMA operation.</p> <p>According to document Diagnóstico Socioeconomico-Censo Agricultura Familiar Agropalma, Junho/Julho 2013, there are 192 small family farmers of which 97 are involved in agricultural activities such as cassava, rice, acai, bananas, peppers, pig farming and others.</p> <p>There are no indigenous communities within Agropalma s area of influence.</p>	Complies
	2.2.2 After March 2014, in new plantations or expansion of existing plantations, a minimum of 0.5 ha of garden or farmland per person is identified via participatory mapping, and enclaved for meeting food security needs.	<p>There were no new plantings established by Agropalma after March / 2014 in the area under influence. The has been new plantations on individually owned farms.</p>	

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3.1. Summary of Findings			
POIG requirement **NOTE: The major Indicators for each section are highlighted in red	Proposed additional POIG indicators	Result of IBD assessment	Evaluation
	2.2.3 Measures designed to maintain or enhance local food security are included in participatory land use planning, including transparency in any land allocation process.	There were no new plantings established by Agropalma after March / 2014 in the area under influence. There has been new plantations on individually owned farms only.	N/A
	2.2.4 Evidence that measures identified in assessments and planning are being implemented and are effective.	There were no new plantings established by Agropalma after March / 2014 in the area under influence. There has been new plantations on individually owned farms only.	N/A
2.3 Effective conflict resolution A balanced, accountable, mutually agreed and documented conflict resolution system is established that is accessible to smallholders, indigenous peoples, rural communities and other affected parties in order to deal with complaints, grievances and resolve conflicts to the mutual satisfaction of the party's. The system will include the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third party mediator.	2.3.1 The mutually agreed and documented system for dealing with complaints and grievances is accessible to all affected parties	AGROPALMA company has a communication procedure on which the different communication channels are described (website and Aló Agropalma) and how to obtain information is detailed. <ul style="list-style-type: none"> ALÓ AGROPALMA: this channel is used to receive complaints from internal staff and community members. The telephone number is 08007090706 extension 8213. This communication channel is for reception of complaints, questions, suggestions, compliments and other commentaries. The response is given in 3 weeks maximum. Agropalma website: there is a link to send commentaries (complaints, questions, suggestions, compliments: reclamacoesequeixas@Agropalma.com.br. Evidence: Complaint sent anonymously on 09-01-2017 External and internal communication procedure (NPG 34) describes the rules for internal and external communication ("assistencia de communication Corporativa") <p>At audit time, the AGROPALMA responsible of communication was the corporate communications assessor CRISTINA PAIVA</p>	Complies

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3.1. Summary of Findings			
POIG requirement **NOTE: The major Indicators for each section are highlighted in red	Proposed additional POIG indicators	Result of IBD assessment	Evaluation
	2.3.2 The system provides a clear and known procedure with an indicative time frame for each stage.	There are documented procedures established by Agropalma and communication channel to receive complaints, questions, suggestions, compliments and other commentaries. The procedure establishes that responses should be given in maximum 3 weeks. Procedure : Document code NPG 16, revise 14, dated 19-07-2016, elaborated by Cristiane Paiva and approved by Tulio Dias.	Complies
	2.3.3 The system keeps parties to a grievance informed of its progress.	An example of the resolution of complaints was shown by Cristina Paiva. There is a record of January 9th. . 2017 where the resolution of a complaint regarding the poor conditions of hygiene in workers accommodation was managed. On February 1st. 2017 the answer was published in the different accommodation modules due that the complaint was established in an anonymous way.	Complies
	2.3.4 The system includes the options of a) access to independent legal and technical advice; b) support from representatives of local communities' own choosing, and c) third party mediation.	The system does consider c) access to a third party mediation, but does not provide a) access to independent legal advice for conflict resolution and b) support from representatives of local community. The non-conformity is present in the 2016 POIG audit report and is kept open during the 2017 POIG report.	Does not comply
	2.3.5 Evidence that where conflicts have arisen the conflict resolution mechanism is being used and outcomes are considered mutually agreed including by affected parties.	There have been no conflicts recorded during the audited period.	N/A

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POIG requirement **NOTE: The major Indicators for each section are highlighted in red	Proposed additional POIG indicators	Result of IBD assessment	Evaluation
	2.3.6 Evidence that outcomes and remedies resulting from use of the mechanism are compatible with internationally recognised human rights.	Results of conflict resolution are not available due that there have been no conflicts during the audited period. Nevertheless, the company procedures call for respect to anonymity and respect of human rights.	N/A

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<p>2.4 Social conditions</p> <p>A comprehensive social programme with regular monitoring is in operation to ensure palm oil production does not result in human rights violations, trigger social conflicts, or produce 'land grabbing', and addresses key social equity issues including housing, healthcare, education and empowerment of women.</p>	<p>2.4.1 Social impact assessments and plans for the avoidance or mitigation of impacts address the issues of potential human rights violations, social conflicts, impacts of migrant workers on local communities, and land grabbing</p>	<p>A Social Impact Assessment (SIA) was performed by the company "Estrategia Medio Ambiente". The different SIA versions were evidenced (volume 2-2004 to volume 7-2012). The last version was performed in 2012.</p> <p>The SIA is comprehensive, demonstrable and implemented.</p> <p>On pages 1-2 of the SIA there is mentioned of the problems that the study area faces, according with the consulted stakeholders, between them : shortness of health services (25%), waste collection service (15.5%), potable water services (13.9%)</p> <p>On chapter 8 of the SIA there is mention of the impacts that Agropalma Group has in the region.</p> <p>On page 8 there is mention of the communities impacted by the community program to be developed by AGROPALMA: Tailandia, Moju, Concado do Para, Tomé Acú, Acará.</p> <p>There are updated plans as the program "Agenda XXI ODS (Objetivos Para Desenvolver Projecto Social)" developed jointly with United Nations (UN) which aims to improve the quality of life in the region. The program was developed by Agropalma and PEABIRU institute, document dated: April 20th.2017. The social activities and chronogram of implementation are shown. The social activities covers diverse aspects: sport, health, prevention, nutrition, education and others.</p> <p>The plans were developed in consultation with Stakeholders including unions.</p>	<p>Complies</p>
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	<p>2.4.2 Social impact assessments and plans for the avoidance or mitigation of impacts address key equity issues, including housing, healthcare, education, and empowerment of women.</p>	<p>The documented plan shows the activities programmed per week, month and year. The activities are classified in categories: Sport, health, prevention, nutrition, education and others.</p> <p>There is a weekly and monthly budget for the activities to be performed and the functions and responsibilities of responsible staff.</p> <p>The plan includes social formation:</p> <ul style="list-style-type: none"> ➤ Framework for local development and local entrepreneur management ➤ Social Manager formation course ➤ Elaboration of rapid participatory diagnostic ➤ Future vision construction <p>It should be noted that the majority of AGROPALMA employees comes from neighboring communities. Was verified that Agropalma meets with employees and representatives to evaluate the improvements / corrections needed. The actions are performed as agreements.</p> <p>Examples of these improvements in the last years are: health care, reforms in medical center and cafeteria, food vouchers, monitoring and management of child labor and informal adult labor, new report describing family farm payments and discounts.</p> <p>Agropalma Group provides adequate infrastructure and educational opportunities for its employees. Improves Infrastructure of villages, contributes to improve health services, leisure options (clubs and social programs) and educational development programs (school, adult education).</p> <p>Water supply comes from pits made by the company and water quality is monitored according to the law every six months.</p> <p>Regarding gender, Agropalma contributes to women empowerment by creating opportunities for them to work in core</p>	<p>Complies</p>
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POIG requirement **NOTE: The major Indicators for each section are highlighted in red	Proposed additional POIG indicators	Result of IBD assessment	Evaluation
		activities, as FFB harvesting, maintenance tasks at mills and operational tasks at mills.	
2.5 Workers' rights Palm Oil Producers shall respect worker's rights including the ILO requirements for 'decent work' and core conventions on child labour, forced or compulsory labour, freedom of association, and elimination of discrimination	Terms and Contracts of Employment 2.5.1 Permanent, full-time employment is used for all core work performed by the company. Casual, temporary and day labour is limited to jobs that are genuinely temporary or seasonal, and account for no more than 20% of the workforce	Agropalma's workforce working in core activities is contracted in a permanent way and are full time workers. All workers are permanent workers and have signed contracts as verified during interviews performed to workers on the field and mills and confirmed through documental review. Standardized contracts are signed by employees and employer, with support orientation of the union and the company. There are no migrant workers at the company and the company does not have the practice of contracting temporary or casual workers.	Complies
	Remuneration 2.5.2 A living wage assessment for all workers, whether employed directly by the company or indirectly by a private employment agency, is conducted based on a credible methodology.	A living wage assessment has not been performed by the company.	Does not comply
	2.5.3. Wages are paid to all workers regularly, on time, directly to the worker and in legal tender or cheque.	The pay checks are issued on a monthly basis and workers receives payslips where all earnings and deductions are detailed. The company deposits the monthly payment in the bank account of each employee. All interviewed employees confirmed that payments are done in a timely manner and according to the conditions established in the contract.	Complies

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POIG requirement **NOTE: The major Indicators for each section are highlighted in red	Proposed additional POIG indicators	Result of IBD assessment	Evaluation
	2.5.4 Wage advances, loans and deductions are legal, recorded, communicated and available to workers upon request, and do not result in debt bondage.	Workers receive pay slips where all earnings and deductions are detailed. All deductions are approved by law or have been previously approved by the worker.	Complies
	2.5.5 All workers, including casual, temporary, seasonal and migrant workers, are provided compensation and benefits consistent with applicable law, including health, pension and social security.	All interviewed employees had confirmed that they receive salaries / payments according to the law and previous agreements made with the company. The company fully complies with labor law and workers receive all benefits established by law as paid holidays, 13th. salary, INSS, FGTS and others. Beyond that, all employees have access to a Health Plan.	Complies
	Working Hours and Leave 2.5.6. The normal work week does not exceed 48 hours, not including overtime, and workers are entitled to at least one day off in 6 consecutive days. Overtime in excess of what is permitted by law is prohibited, and workers report that all overtime is voluntary.	Mills work with three shifts (8 hours per shift) minimizing the necessity of extra hours of work. At the field, there are no extra hours. Interviewed workers indicated that they do not work more than 48 hours a week and the working schedule contemplates one day off after 6 consecutive days of work. In the case of necessity to work extra hours, the personnel that works those extra hours do so just if they wish.	Complies

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POIG requirement **NOTE: The major Indicators for each section are highlighted in red	Proposed additional POIG indicators	Result of IBD assessment	Evaluation
	2.5.7 All workers are provided legally mandated public holidays and periods of leave consistent with applicable law, including paid annual, parental, compassionate and sick leave. Workers not covered under applicable laws are entitled to equivalent benefits.	“Verified that all employees enjoy public holidays and periods of leave consistent with Brazilian law. For example, the women have 6 months for maternity and when happened a sick or accident the employee has the right to leave during the required time and receive benefit wages during this period. Beyond that, Agropalma pays the additional salary related with vacations and other additional payments required by law or negotiated via collective agreements with the unions.” The text above is the text present at the POIG 2016 report and its content was validated during the 2017 audit. Full compliance with Brazilian law was verified.	Complies
	2.5.8 Records are maintained and demonstrate that hours of work do not exceed the maximum allowed by local law, regulation or collective agreement or 48 hours (per 2.5.5 above), whichever is lower.	Payslips were reviewed at the human resources department where it was verified that workers do not work more than 48 hours a week.	Complies
	Child labour 2.5.9. A clear policy and compliance system is in place that prohibits child labour and its worst forms and sets the minimum age for employment consistent with applicable law.	The Social Responsibility guidelines NPG-25 07.07.2016 item 5.2.1 prohibits work of persons under 16 years in any sector of the company. Manual of Conduct, signed by each employee in item 7:34 mentions that work for children under 18 years may occur if protection is provided in specific contracts as the apprentices program: Example: “Jovem Aprendiz” program in conjunction with SENAR. Agropalma hires workers over 18 years old, only.	Complies

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POIG requirement **NOTE: The major Indicators for each section are highlighted in red	Proposed additional POIG indicators	Result of IBD assessment	Evaluation
	2.5.10 Young workers legally permitted to work but subject to compulsory education laws only work outside school hours.	Agropalma hires workers over 18 years old, only. The apprentice program allow young people after 16 years old to work but only outside schools hours.	Complies
	2.5.11 The company maintains an up-to-date list of hazardous activities and functions in the workplace that are prohibited for young workers consistent with or exceeding national regulation, where applicable.	Agropalma establishes according to Brazilian law that young workers could work only under apprenticeship program. Any kind of hazardous activity is forbidden for young apprentices.,	Complies
	Forced or trafficked labour 2.5.12. No fees or costs are charged to workers, directly or indirectly, for recruitment or employment services by recruitment agencies, private employment agencies or the employer. Where it is discovered that fees have been charged, workers are reimbursed the total amount paid.	It has been found that there is no practice of hiring temporary or migrant workers by the company. All are registered according law and are treated the same way. The workers interviewed stated that they are satisfied with their work schedules. Most of the workers are residents of nearby communities. None of the interviewed workers have paid fees to be recruited and manifested that most people send their applications forms to AGROPALMA directly.	Complies
	2.5.13 The retention of passports, other government-issued identification and any personal valuables by the employer or third party recruitment or employment agency is strictly prohibited in policy and monitored in practice.	Was verified that Agropalma does not practice the retention of personnel documents of employees. This practice is forbidden according to Brazilian law and Agropalma respect this right.	Complies

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3.1. Summary of Findings			
POIG requirement **NOTE: The major Indicators for each section are highlighted in red	Proposed additional POIG indicators	Result of IBD assessment	Evaluation
	2.5.14. Growers and millers conduct a risk assessment of their FFB supply chain to identify and take steps to address risk of forced labour, human trafficking and child labour.	Agropalma has a department dedicated exclusively to provide technical assistance to partner which includes compliance with RSPO requirements. Internal audits are performed to FFB suppliers and constant training is delivered to growers and growers workers. Through monthly visits the team monitors compliance of social and environmental issues at farms part of the supply base, including human trafficking and child labor, and also establishes requirements to be fulfilled by other members of the supply chain	Complies

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POIG requirement **NOTE: The major Indicators for each section are highlighted in red	Proposed additional POIG indicators	Result of IBD assessment	Evaluation
<p>2.6 Support to smallholders</p> <p>Contracts with smallholders are based on a fair, transparent and accountable partnership. Smallholders are supported to improve economic, social and environmental outcomes including: increase productivity to a comparable benchmark of productivity for the region and a target of having the same productivity as the company nucleus plantation. The productivity gains shall be achieved without expansion that threatens local community food security or additional environmental impact, and support should include financial management and budgeting, logistics and FFB processing, and improved market access such as through group certification. Companies shall report on the support they have provided to smallholders.</p>	<p>2.6.1 A smallholder support program is developed, documented and monitored, which includes: a) Measures to increase the productivity of smallholders to a comparable benchmark of productivity for the region, and a target of reaching at least the same productivity level as company estates; b) Support relating to financial management and budgeting and c) Support relating to logistics, FFB processing and market access.</p>	<p>“Agropalma has a department dedicated exclusively to provide technical assistance to partner producers without charging for this service, and is offered the possibility of acquiring inputs for use in their activities and discount payments to be received with accessible values. Beyond the service monitors the social and environmental indicators, with verification of activity costs, payment of labor charges, palm cultivation satisfaction and other issues that may arise.</p> <p>Through technical assistance reports and record books of visits (black book) routinely performed every producer can show the impacts caused.</p> <p>Agropalma monthly releases for each producer the prices charged for the purchase of FFB, as provided in the contract signed, and for each delivery the producer is informed about the total received and is informed about the value to be received at the end of the month.</p> <p>All audited farmers reported:</p> <ul style="list-style-type: none"> - Having knowledge about the amounts paid, reported knowing the dynamics of payment, they are informed about the international value set by Rotterdam and that the price paid is reported in routine visits by technicians Agropalma. - That they received all the necessary explanations, are satisfied with the conditions stated in the contract and understand that the business relationship is done transparently. - That payments are made on the dates established between them and Agropalma and there is no late registration.” The text above is the text present at the POIG 2016 report and its content was validated during the 2017 audit. 	<p>Complies</p>

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POIG requirement **NOTE: The major Indicators for each section are highlighted in red	Proposed additional POIG indicators	Result of IBD assessment	Evaluation
	2.6.2 Progress in implementation of the smallholder support program is included in public reporting.	<p>Agropalma publishes data related with support to smallholders in the Sustainability Report which can be downloaded from the Agropalma Group webpage (www.agropalma.com.br). The Sustainability Report is published / updated every two years.</p> <p>The last published report is AGROPALMA : RELATORIO DE SUSTENTABILIDADE 2015. (Http://www.agropalma.com.br/arquivos/relatorios/Relatorio_Sustentabilidade_2015_Portugues-1480095831.pdf) where information regarding support to smallholders can be consulted at pages 47,48 and 49.</p>	Complies
	2.6.3 Report on percentage of schemed smallholders, percentage of independent smallholders and percentage RSPO certified of each.	<p>Agropalma presented a complete list of all schemed smallholders and integrated farmers involved to RSPO certification. The documents are named: Inventario Agricultura Familiar 2017 and Relacao Produtores. Both are excel data bases and contains the name of the grower, lot number, number of plants, ha, plants per hectare and other information.</p>	Complies

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POIG requirement **NOTE: The major Indicators for each section are highlighted in red	Proposed additional POIG indicators	Result of IBD assessment	Evaluation
	2.6.4 Develop a group certification plan for independent smallholder identified in the supply base of each mill within three years of the mill obtaining its own certificate and support the independent smallholders to achieve certification and progress towards POIG verification.	<p>Agropalma S.A. provides technical assistance to each of the growers through a team of 13 professionals. Each of the growers is visited at least once a month and receives support in different areas as good agricultural practices, crop management, compliance with legal requirements, monthly price of FFB, compliance with RSPO certification system and standards and others. Through the signed contract each of the growers agree to manage their oil palm plantation according to the agronomic advice given by Agropalma S.A. and in compliance with the RSPO applicable requirements.</p> <p>4 of 5 mills are RSPO IP certified and generally receives only RSPO certified FFB and 1 of 5 mills (Parapalma mill) is RSPO MB certified and receives certified and non-certified FFB. The non-certified FFB comes from growers that have failed in complying with all RSPO standard major indicators, mainly related with remediation and compensation aspects that takes time to be solve, and that were removed from the RSPO certificate scope. Once these growers solve their non compliances, will be included in the Agropalma RSPO certificate again.</p>	Complies

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POIG requirement **NOTE: The major Indicators for each section are highlighted in red	Proposed additional POIG indicators	Result of IBD assessment	Evaluation
3.1 Anti-corruption and Transparency Producer companies shall publicise a commitment to prohibit any form of corruption including during the concession acquisition process and within their operations, and support efforts to establish and comply with anti-corruption legislation where this exists. In the absence of anti-corruption law, the producer company shall implement other anti-corruption measures proportionate to scale and intensity of management activities and the risk of corruption.	3.1.1 An ethical policy prohibiting all forms of corruption is publicly available.	<p>Agropalma s Manual of Conduct for Employees September / 2015 is distributed to all employees at the time of been hired and employees signed a document stating that they received it. In subsection 1 it is mentioned that companies owned by Agropalma Group must operate in compliance with existing national laws and ethical principles. Among the laws there is the Anti-Corruption Law.</p> <p>The document NPG 25 "Social Responsibility Policy (Ver. 02, 07/07/16) in item 5.3 " Integrity and ethics in business " there is mentioned of the company's commitment to fully respect the anti-corruption law.</p> <p>All documents are written in portuguese and are written in an easily comprehensive manner.</p> <p>In addition, Agropalma is signatory of the Business Pact for Integrity and Against Corruption (ETHOS).</p>	Complies
	3.1.2 The ethical policy covers: a) Bribery; b) Facilitation payments; c) Guidance and procedure for gifts and hospitality d) Disclosure of political contributions; and e) Guidelines for charitable donations and sponsorships, f) Respect for fair conduct of business; g) Proper disclosure of information in accordance with applicable regulations and accepted industry practices and h) Compliance with existing anti-corruption legislation.	<p>Agropalma policies does not cover items c) and e).</p> <p>The abovementioned fact was established as a non-conformity during the 2016 audit and during the 2017 audit the Corporate social and environmental manager confirmed that items c and e has not been incorporated in the Agropalma policies yet.</p>	Does not comply

<p>3.2 Traceability</p> <p>Within 12 months of commitment to the Charter, all supply is fully traceable from company plantation and other suppliers' fields to their mills. Each party shall take responsibility for traceability in the components of the supply chain under their control and transparency with their supply chain partners.</p>	<p>3.2.1. Within 12 months of commitment to the Charter all mills under the management of the grower member have a traceability system in place to identify the location (at least GPS coordinates) of FFB production.</p>	<p>Agropalma has a management system called BioSalq that manages the income of all FFB entering the 5 mills</p> <p>There is a Rotina Operacional RO BEFT-001 Revisao :02, Data 13/06/2017, Folhas:15 para Pesagem de Materia Prima e Produtos. The routine applies for every Agropalma Group mill including Parapalma.</p> <p>The routine describes in detail the procedure to allow entry of FFB to the mill and it counts with:</p> <ol style="list-style-type: none"> 1-Objective 2-References 3-Definicoes e siglas 4-Responsabilidade 5-Alteracoes realizadas nesta RO 6-Detalhamento 6.1 Pesagem de CFF (materia prima) in which it is detail of each of the steps to generate the Tocket de Pesagem. 6.5. Registros 7- Aspectos Ambientais Significativos e secoes 8, 9, y 10. <p>The centralized system that is in use to register entry of FFB to the mills has a data base where all growers allowed to deliver FFB to the mills are register and there is detailed information of each of them as number of lots, date of plantation, address as well as the certification status (RSPO). The data base also contains the records of all of Agropalma S.A. own oil palm lots.</p> <p>The register of FFB entry is recorded at the scale where a Ticket de Pesagem is generated. To be registered in the system, supplier must have a contract. In this way, the mills only receive FFB from previously known and approved suppliers.</p> <p>Department dedicated exclusively to provide technical assistance to partner producers has all information of smallholders, including GPS coordinates.</p>	<p>Complies</p>
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3.1. Summary of Findings			
POIG requirement **NOTE: The major Indicators for each section are highlighted in red	Proposed additional POIG indicators	Result of IBD assessment	Evaluation
	3.2.2. Within 24 months of commitment to the Charter the mills under the management of the grower member will only source FFB from known and identified sources and not from illegal sources.	<p>The FFB supply base for the Agropalma Group mills comes from Agropalma S.A. own land composed by 8 agricultural sectors, leased land managed by Agropalma S.A. and 233 outgrowers (family farmers and integrated growers). All of the abovementioned FFB suppliers are covered by the certificate scope. Additionally, there are two integrated growers that were excluded from the scope certificate last year due to non-compliance with the new planting requirements. Currently there are 192 family farmers, divided on 5 projects (I, II, III, IV and V) where each of the families/grower owns from 4 ha to 12.48 ha and 41 integrated outgrowers with oil palm planted areas between 16.65 ha and 1372.75 ha. The Company has commercial long-term contracts with all of them. Some family farmers/growers are organized in associations managed by a board of directors, commanded by a president.</p> <p>Agropalma only receives FFB from already registered growers on its supply base database. See text on indicator 3.2.1. above.</p>	Complies

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POIG requirement **NOTE: The major Indicators for each section are highlighted in red	Proposed additional POIG indicators	Result of IBD assessment	Evaluation
	3.2.3. Within 24 months of commitment to the Charter the company will have a time-bound plan to bring all FFB sourced into compliance with the POIG indicators and efforts to bring non-compliant smallholders into compliance are documented.	<p>“Until now Agropalma demonstrated that all smallholders integrated are in compliance with POIG indicators. Amongst the integrated outgrowers, two of them failure in complying with RSPO requirements on SEIA/HCV studies before new plantings. So Agropalma decided remove them from RSPO certification and, as consequence, they are in conflict with POIG, which requires RSPO as a pre-requirement. Company already reported this case to RSPO complaints system and is running a Remediation and Compensation Procedures.” The text above is the text present at the POIG 2016 report and its content was validated during the 2017 audit.</p> <p>The two outgrowers that have failed in complying with all RSPO standard major indicators, mainly related with remediation and compensation aspects, are working to solve the non-compliance but due to the type of non-compliance it takes time to be solve. Once this growers solve their non-compliances, will be included in the Agropalma RSPO certificate again.</p>	Complies
3.3 Report on Social, Labour and Environmental Performance Disclose the company’s social, labour and environmental performance including the elements of the POIG Charter, and how the organisation demonstrates good governance of its sustainability system using the guidance of the Global Reporting Initiative (GRI) or equivalent approach.	3.3.1 A publicly available sustainability report is prepared at a minimum every two years, covering as a minimum all issues relevant to compliance with this Charter. This includes relevant RSPO indicators and the additional POIG indicators.	It was verified that Agropalma publicize every two year the sustainability report. The report is available at the Agropalma webpage and it covers RSPO and POIG relevant indicators. The last published report is AGROPALMA : RELATORIO DE SUSTENTABILIDADE 2015. (Http://www.agropalma.com.br/arquivos/relatorios/Relatorio_Sustentabilidade_2015_Portugues-1480095831.pdf).	Complies
	3.3.2 The public sustainability report includes details relating to the company’s governance of its sustainability systems, consistent with the GRI Sustainability Reporting Guidelines (or equivalent approach).	It was verified that Agropalma s sustainability report is made according to GRI Sustainability Reporting Guidelines.	Complies

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POIG requirement **NOTE: The major Indicators for each section are highlighted in red	Proposed additional POIG indicators	Result of IBD assessment	Evaluation
3.4 RSPO Certification and Company Operations Producers shall meet a minimum of 50% of their plantations being RSPO certified upon commitment to the Charter, and a commitment to achieve 100% by within 2 years. This shall cover all palm oil operations, subsidiaries, acquisitions of existing plantation and fresh fruit bunch purchases from third parties, with possible alternatives to full RSPO certification for small independent producers.	3.4.1 A minimum of 50% of the company's plantations and mills are RSPO certified upon commitment to this Charter.	A 100 % of Agropalma s plantations and mills are RSPO certified.	Complies
	3.4.2 Within 24 months of POIG membership, 100% RSPO certification of the company's plantations and mills is achieved.	Agropalma achieved 100 % of its mills and plantations as RSPO certified.	Complies
	3.4.3 Newly acquired plantations are RSPO certified within 24 months of acquisition.	There are no newly acquired plantations at Agropalma.	Complies
	3.4.4 A policy for purchasing 100% RSPO certified FFB within 24 months of signing the POIG Charter is developed, implemented and monitored for progress. Acceptable alternatives may be defined for independent smallholders.	In 2016 Agropalma decided to withdraw two integrated farmers of their certification because they have not met all RSPO requirements for new planting procedure. Facing the situation, still during the 2017 audit, the two growers has not been able to solve the situation due to the complexity of the RSPO remediation and compensation procedure. Agropalma is following up the advances of the two integrated growers towards full compliance to re integrate them in the Agropalma RSPO P&C certificate. Due that at the moment not all FFB purchased is RSPO certified taking into account all of the AGROPALMA mills, all of them certified, the non-conformity established in the 2016 audit, is left open.	Does not Comply
3.5 Responsible Supply Chains Producers shall independently verify and report on compliance with this charter within 12 months of commitment to the Charter, across their operations, subsidiaries and acquisitions of existing plantation including FFB from 3rd party suppliers.	3.5.1 Compliance with the requirements of the Charter, including the POIG indicators, is independently verified within 12 months after signing the commitment to this Charter.	The present audit is the third audit evaluating compliance with POIG indicators at Agropalma. The last audit before the current one was performed in July 2016 (12 months before the current audit).	Complies
	3.5.2 Following the initial assessment, compliance with the requirements of the Charter, including the POIG indicators, is independently verified on an annual basis.	Agropalma s POIG audit are made jointly with the RSPO audit that are performed on an annual basis.	Complies
	3.5.3 Audit reports are made publicly available on the POIG website.	Last Agropalma POIG audit was published at the POIG website.	Complies