

IBD
CERTIFICATIONS

Palm Oil Innovation Group POIG

Charter Pilot Indicators 2014

Public Summary Report

Main Audit: 11th and 12th August 2014

Report: 13/08/2014 revised in 03/nov/14

GRUPO AGROPALMA, S.A.

Country: Brazil

Report prepared by: Alvaro Garcia and Ronald Vargas

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PART 1: SCOPE OF THE VERIFICATION AUDIT

1.1 Normative references

The Palm Oil Mill and the supply base was audited against the following documents:

- Palm Oil Innovation Group Charter Pilot Indicators – April 2014.

1.2 Company and Contact Details

Company name:	GRUPO AGROPALMA
Business address:	Alameda Santos, 466 – 10 ^o andar, CEP: 01418-000, São Paulo, Brasil
Contact person:	+55 11 2505 6400
Mobile telephone:	Marcello Brito
e-mail:	marcello@agropalma.com.br
Web site:	www.agropalma.com.br
Other certifications held (ISO...)	DNV. IBD Organic. Ecosocial. JAS organic. BioSuisse. ISO 9001. ISO 14001. ISO 22000.

1.3 Audit type

Date of this audit:	Monday 11 th AND 12 th August, 2014.
Main:	First Verification

1.4 General Description of Supply Base

The supply base of FFB for the Agropalma Group comes from the seven owned Agricultural Sectors as well as from Growers (i.e. Family and Independent Growers). FFB is delivered from the closest Department and so all the supply base as below is included in the audit.

The independent growers are referred to as “Partners” and vary in size from 10ha to just over 2,000ha.

- The supply base is organized in 4 farmer associations. Management of the associations is by way of a President and individual smallholders may be wholly responsible for their own planted area or work may be contracted out to a Consortium who employs workers.
- FFB is also supplied by Associated Outgrowers who are responsible for their own management and **may** have different arrangements for the delivery of FFB to the palm oil mills.

Agropalma have 4 palm oil mills and to date the FFB from the Independent Growers has only been delivered to Agropalma

Mill, which has sold the CPO as conventional even though certified FFB is also processed from company RSPO plantations.

It is noted that Agropalma provide agronomic support to all Independent Growers by way of 14 professionals and all partners are visited at least once per week. All the Independent Growers must have an agreement to manage their oil palm in accordance with the agronomic advice given by the Palm Oil Mill and in accordance with the applicable indicators of the National or Local Interpretation.

1.4.1 Statistics of the Supply Base and Estimated Tonnes of FFB produced per year					
Name	Area of Oil Palm (Ha)		Est Tonnes FFB/Yr	Planting Years	Cycle (Years)
	Total/ Certified	Mature/ Production			
Departamento I	4.820	3.326	77,476	2013;2010;1992 1991;1989;1988 1987;1986;1985	25
Departamento II	5.194	2.200	67,893	2013;2012;2010;1999;1994;1993;1992;1991;1984	25
Departamento III	6.570	6.570	148,506	1999;199;1997 1996;1995;1992	25
Departamento IV	4.954	4.954	118,206	2.001; 2.000 1.999; 1.998	25
Departamento V	6.177	5.945	74,528	2011;2010;2007;2004;2002;2001	25
Departamento XV	4.149	4.149	80,881	2010;2009; 2008;2006	25
Departamento XVI	3.090	3.090	57,726	2010;2009; 2008;2007	25
Independent Growers.	11.057	9.927	181.977	2013;2012;2011;2010;2009;2008;2007;2006;2005 2004;2003;2002;2001;2000;1999;1998;1986	25

1.4.2 Biodiversity (Total Conservation & HCV Area for the respective Supply Bases)			
Oil Palm Plantation	Biodiversity.(Total Conservation & HCV Area) Hectares.		
Name	Conservation detail:	HCV	Comments
Departamento I	5.500	5.500	The biodiversity reserve is mainly comprised of retained forest cover at the time of acquisition of the area in accordance with Brazilian Law. In addition, the company has developed Permanent Protected Areas (PPA) for a minimum of 30 metres from all water courses and wetland habitats. Within the PPAs no work is carried out and vigorous natural regeneration is taking place.
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 XV	6.791	6.791	
Departamento XVI	8.578	8.578	
Independent Growers	13.090	13.090	

PART 2: VERIFICATION 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 UEBT (*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^o: 8-0090-08-000-00. Approved since 09/2008.

2.2. Audit Team

Audit team:	Alvaro Garcia and Ronald Vargas
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2.3. Audit Methodology

Audit plan

Operation:	Agropalma, S.A.	
IBD code:	PA 001	
Address:	Alameda Santos, 466 – 10o andar, CEP: 01418-000, São Paulo, Brasil	
Lead auditor:	Ronald Vargas	
Audit team:	Álvaro Garcia	
Audit type:	<input type="checkbox"/> Certification audit <input type="checkbox"/> Annual Surveillance Assessment	<input checked="" type="checkbox"/> Verification audit <input type="checkbox"/> Investigation audit
Category:	<input type="checkbox"/> Crop - Plant Production <input type="checkbox"/> Wild collection	<input type="checkbox"/> Handling - Processing <input type="checkbox"/> Livestock
Objective:	This audit aims at verifying/ensuring that the above mentioned Company complies fully with the requirements of the following standard(s) last version:	

Reference standard:	<input type="checkbox"/> Organic Brazil - Lei 10.831	<input type="checkbox"/> Integra	
	<input type="checkbox"/> Organic IBD (equivalent CE834/07)	<input type="checkbox"/> RSPO P&C	
	<input type="checkbox"/> Organic IBD (equivalent IFOAM)	<input type="checkbox"/> RSPO SCC	
	<input type="checkbox"/> Organic NOP - USDA	<input type="checkbox"/> RAS Agriculture	
	<input type="checkbox"/> Organic JAS	<input type="checkbox"/> RAS Livestock	
	<input type="checkbox"/> Organic Biosuisse	<input type="checkbox"/> RAS Supply chain	
	<input type="checkbox"/> Organic KRAV	<input type="checkbox"/> RAS Grow ers groups	
	<input type="checkbox"/> Organic Korea	<input type="checkbox"/> RAS Climate module	
	<input type="checkbox"/> Organic Demeter	<input type="checkbox"/> 4C	
	<input type="checkbox"/> Health and Beauty IBD	<input type="checkbox"/> UEBT	
	<input type="checkbox"/> Cleaning Products IBD	<input type="checkbox"/> Non GMO IBD	
	<input type="checkbox"/> Agroecoturism IBD	<input checked="" type="checkbox"/> POIG	
	<input type="checkbox"/> EcoSocial		
	Certification scheme:	<input checked="" type="checkbox"/> Individual	<input type="checkbox"/> Group
Products:			

Date	Time	Location	Program	Auditor(s)
11-08-2014	02:35	Belém	Arrival to Belem and translate do Hotel Sagres of Alvaro Garcia (Flight GOL)	Álvaro
	08:00	Belém	Translate from Sagres Hotel to airport to meet Ronald	Álvaro
	09:00	Belém	Arrival to Belem and transport to Tailandia of Ronald Vargas and Alvaro	All
	14:00	Tailandia	Opening Meeting	All
	14:30-18:00	Tailandia	POIG Principles 1, 2 and 3	All
12-08-2014	08-12:00	Tailandia	Continuation POIG Principle 2 and 3	All
	13:00-15:00	Tailandia	Continuation POIG Principle 3 and Auditors Preparation for Closing Meeting.	All
	15:00	Tailandia	Closing Meeting	All
	15:30	Tailandia	Return to Belém	All
	23:30	Belém	Return to airport (Álvaro)	Alvaro
13-08-2014	08:00 – 18:00	Belém	Reserved for eventually finish with Ronald any missed questions	Ronald
	21:30	Belém	Return do airport (Ronald)	Ronald

The agenda is preliminary and may be adapted or modified as needed. Changes will be communicated preferentially in the opening meeting or at any time as necessary.

The auditor(s) and all people indicated by IBD that my witness this audit have committed themselves in writing to keep confidential the data and results of the audit.

The operation shall assign a representative with knowledge of the activity related to the certification process, to provide unrestricted access to documents and locations that will be verified during this audit.

If no appeal against this audit plan is raised within 2 days from receipt, we will consider it accepted.

2.3.1. Outline of how stakeholders consultation was managed.

Stakeholders include workers and during the course of the audit, both individual workers and groups of workers were interviewed. In addition the communities Villa dos Palmares, Villa Nova Esperanca. Further details are given in the checklist for the evaluation of Principles & Criteria 2013 attached to this report.

Meeting with the Claudimar Borges Trindade, President of Association of Palmares District, evidence the positive influence of the company through the definition and approval of an action plan named Agenda 21, which is a United Nation Program to improve life quality. All the association members had attended a meeting with Agropalma and they worked on the following: Increase the number of policemen in the village, construction of a small sports field, improved school food, a new ambulance for the village, improved water supply, and a health centre.

The association provides services and acts as a centre for information with the following information as an example: fight human trafficking, contacts for the police, ambulance contact, Agropalma programs, and sexual abuse prevention among other.

The association reported no negative influences with Agropalma.

Manual Gormez Macial and Rayondo Soares Gomes from Villa Nova Esperanca (founded in 1864). 50 houses with 300 inhabitants. Both interviewees are former workers of the company and are grateful to Agropalma for work for relatives. Support with an ambulance, transport and emergencies. Small shop to serve the community.

The Agropalma school was visited. Jane Elisa Otomar Buecke (Headmistress). 640 students. 500 day students and 140 adults at night. Primary and Secondary pupils. System with Positivo. The school is 100% subsidized by Agropalma. 23 teachers. There is a national index of schools performance and of the 200 schools in the State, they are number 70 – better than the private local school.

The School Students mainly go onto university. The facility holds an IT department:

The canteen is run by a private service food subcontractor and the food quality has improved very much. Potable water is fully available.

The main clinic was visited, which is effectively a small hospital with full access by workers and families. More details in checklist.

Transportation of workers to all departments is by bus. A sample of running buses was inspected and the driver of buses were interviewed to confirm that he had valid licenses. All buses had functional and stocked toilet units for females and males.

2.3.2. Issues that arose during stakeholder consultation and company responses.

Subject raised	Company response and proposed action to be taken.	Audit team findings
No negative subjects.	n/a	n/a
Land dispute noted but not as part of stakeholder consultation.	The matter is being dealt with in the Courts in a considered and appropriate manner.	No further action.

34.1. Summary of Findings

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
1. Environmental Responsibility				
<p>1.1 Breaking the link between Palm Oil Expansion and Deforestation: Forest Protection - Conserving and Restoring High Conservation Value (HCV) and High Carbon Stock (HCS) Areas: The link between oil palm expansion and deforestation will be broken through undertaking a High Carbon Stock approach in addition to a 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>7.1.1., 7.1.2. Diagnostico e Elaboracao dos projectos Socioambientais para a Agropalma usando a implementacao de un programa de responsabilidad social, abril de 2008. The entire area purchased for new planting was subject to an SEIA.</p> <p>Documents verified: Risks Maps related with the communities/local stakeholders; Diagnostic and elaboration of Agropalma's social and environmental projects aim to implement a Social Responsibility Program made by Conservation Internacional and Peabiru Institute, April, 2008; Evaluation Report of Social and Environmental Impacts related of new plantings at new farms made in 2009 and 2010 at Tailândia and Tomé Açú cities, by Orbis Exceller.</p> <p>7.3.1 Monitoramiento de Fauna e Flora no Complexo Agroindustrial Do Agropalmas, Nov-Dez-2012 e Jan.2013 by Conservacao Internacional, 15-01-2014; Biannual Report.</p> <p>7.3.2 No HCV identified in the new planting areas. The company has retained forest cover in accordance with Brazilian Law.</p> <p>7.3.3 Dates of land preparation and commencement are recorded electronically and on maps developed for that purpose.</p> <p>7.3.4 Proper buffers zones have been implemented to protect forest or HCV areas as described</p>	<p>A High Carbon Stock (HCS) forest approach which combines biodiversity, carbon conservation and social considerations including community needs will be conducted prior to establishing new plantations or expanding existing ones.</p> <p>HCS forest areas shall be identified and mapped;</p> <p>No new plantings shall take place on HCS areas identified for conservation after March 2014.</p> <ul style="list-style-type: none"> Identified HCS forest areas are actively conserved as part of a participatory land use plan and the FPIC process, and an overall estate conservation plan that includes HCV areas, riparian zones, peat land areas and any other areas legally required to be conserved. A report of the HCS approach shall be made public; As part of the carbon conservation approach the RSPO report on the potential emissions and the plan to minimise them will be made public; 	<p>No new plantations done at the expense of forested areas since 2002. Therefore, there is not an HCS indicator development study for future new planting/expansion areas.</p> <p>Last planting of new areas occurred in 2010 on a total of 516.46 ha previously dedicated to pasture/grassland. In 2002; 687.72 ha of primary forest were transformed into Palm Oil.</p> <p>A historical map of planting areas since 1983 to 2009 was available for review: Mapa de vegetação precedente aos plantios, Referência 16/11/2009, escala 1:100.000.</p> <p>Applicable methodology for vegetation definition to be used for agricultural land HCS calculation was that described in IN 02/2014 Secretaria Estadual do Meio Ambiente do Pará (SEMA). Generated information should be validated against other existing methodologies.</p> <p>It is importante to mention that the IN/02/2014 intstruction should be respected locally as applicable legislation.</p> <p>Based on the tool Palm GHG Calculator e Agropalma Sustainability Report 2013 (draft), for each Ton of CPO or KPO produced 1.62 Carbon Tons are sequestered. Thus, considering 64,000 ha of preserved forest, it was estimated that 2 Tons of Carbon per hectare per year were sequestered at this operation.</p>	<p>Not applicable because all plantations were prior to POIG draft.</p>

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>in Monitoramento de Fauna e Flora no Complexo Agroindustrial Do Agropalmas, Nov-Dez-2012 e Jan.2013 by Conservacao International, 15-01-2014; Biannual Report.</p> <p>Several RTE and new species have been found in protected areas (i.e. Libellula herculean Karsch, 1889, and Epipleoneura tariana, Machado 1985); which are protected under HCV and forested zones of the company.</p> <p>7.3.5 Diagnostic and elaboration of Agropalma's social and environmental projects aim to implement a Social Responsibility Program made by Conservation Internacional and Peabiru Institute on April, 2008. Describes participation of communities; Evaluation Report of Social and Environmental Impacts related of new plantings at new farms made in 2009 and 2010 at Tailândia and Tomé Açú cities, by Orbis Exceller.</p> <p>7.8.1., 7.8.2. All polluting activities are assessed. Partly in PGRS for solid waste. Gaseous emissions are monitored from the POM boiler. They have started to use the software from RSPO.</p> <p>Since 2009, the company has been considering GHG gases. In 2013 tow managers attended RSPO training in Kuala Lumpur. The RSPO GHG assessment tool is being used.</p> <p>The sources of emissions and sequestration are identified.</p> <p>Land clearance in the past was the main source of GHG. This cannot be managed. There are emissions from fertiliser and fuel. Main emission is POME and this is covered elsewhere in this document.</p>		<p>The corresponding report has not been made public since it is under review.</p> <p>Forested areas mapping has not been conducted considering HCS.</p> <p>There is not a written Plan to minimize Green House Gases emission and Carbon production. However, a project for POME handling has been implemented at the new Palm Oil Extraction Mill under construction. The implemented system is expected to capture and use gas emissions for steam generator operation. This system, if viable and applicable for the rest of the company Mills, will result in projected GHG emission reduction until 2018.</p> <p>The company expects to augment its total emissions due to more fertilizer usage and mechanization of its operations.</p> <p>Reference documents: Novo Código florestal publicado em 2012 (Lei 12.651, 2012).</p> <p>IBD Comments: Once having the HCS approach developed, IBD will be able to better define its applicability and checking level of difficulty for compliance verification.</p>	

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>Crop sequestration of GHG and there are 64,00ha of forest reserve.</p> <p>The model potentially shows a net sequestration of carbon.</p> <p>However, by being conservative, there is 1.62 mt of CO2 released per 1mt of CPO produced. However, if the conservation blocks are considered to be sequestering 2mt per ha per ha of C, (Equivalent to 7.333 mt CO2) then the result is that the company is capturing 1.5 mt CO2 per year.</p>			
<p>1.2 Peat land:</p> <p>a) 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.</p> <p>b) Maintenance of peat lands: Water tables are managed in existing plantations on peat in order to minimize 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>	<p>4.3.1 Soil maps are available. Identified hydromorphic and sandy soils are presented but located within forest reserves as indicated in Mapas de Solos e Reserva Legal Das Fazendas Do Grupo Agropalma, Escala 1:300.000.</p> <p>4.3.2. All observed planted áreas were in compliance with the planting slope requirement.</p> <p>4.3.3 An excellent road maintenance programme was in place.</p> <p>4.3.4 No peat soils identified or planted at this operation.</p> <p>4.3.5 No peat soils identified or planted at this operation.</p> <p>4.3.6 No other fragile and problem soils found at this operation according to existing soil mapping and geomorphological studies.</p> <p>4.4.1 A management plan is in place (i.e. Agropalma Mill: Licence to use water. No 1420/2014, Valid until 30-07-2018. Rio Acará, 02° 32' 42" S; 48° 42' 10,4" W, uso é industrial e doméstico. 1804 m3 per hour).</p>	<ul style="list-style-type: none"> • Soil maps must take a precautionary approach to peat and identify all areas of soil that contains at least 20% organic material, is at least 40 cm in depth. • There shall be no new plantation development on any peat soils identified, for any activities, including drainage, infrastructure and nursery development. • There shall be no use of fires on peat soils. • Where there is existing planting on peat, an assessment shall be required to determine whether there are opportunities to contribute to the restoration of critical peat land ecosystems. If opportunities are identified, a strategy for restoration shall be developed and implemented. Strategies shall seek to replant on mineral soils, including via 'land swaps'. 	<p>Soils maps of planted and of forest protected areas belonging to Grupo Agropalma, S.A. showed no evidence of any fragile soils; including peat soils (i.e. Map Fazendas do grupo Agropalma (escala 1:300.000); and the official reference Projeto Radan Brasil, levantamento de recursos naturais volume 5, folha SA22 Belém (1974), Geologia e Geomorfologia de solos e uso potencial da terra).</p> <p>More than 90 % of the soil types identified corresponded to Latosols (i.e. latosolo amarelo (i.e. Mapeamento dos tipos de solos existentes no estado do Pará (IBGE)).</p> <p>On site evidence (i.e. planted Departments I, II and VI) indicated absence of peat soils at this operation.</p> <p>IBD Comments: Applicable when peat soils exist or are detected. Company must have appropriate knowledge and resources to be able to check soil/land quality.</p>	<p>Not applicable due to peat land absence in the region.</p>

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>4.4.2 Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones is in place. For identified water coursers a minimum buffer zone of 30 meters has been established. Field visits permitted verification of such actions.</p> <p>5.5.1 No land preparation by burning at this Company.</p> <p>5.5.2 No land preparation by burning at this Company.</p> <p>7.2.1 Soil suitability maps or soil surveys adequate to establish the long-term suitability of land for oil palm cultivation are available and taken into account in plans and operations (i.e. Mapas de solos e reserva legal das fazendas do grupo Agropalma (escala 1:300.000).</p> <p>7.2.2 Topographic information adequate to guide the planning of drainage and irrigation systems, roads and other infrastructure is available and taken into account in plans and operations.</p> <p>7.4.1 Maps identifying marginal and fragile soils, including excessive gradients and peat soils, are available and used to identify areas to be avoided. No peat or fragile soils detected at this operation. Sandy soil formations were present within protected forest areas.</p> <p>7.7.1 No land preparation by burning at this Company. No land preparation by burning at this Company.</p> <p>7.7.2 No land preparation by burning at this</p>	<ul style="list-style-type: none"> For existing plantings on peat, the water table should be 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 (Criteria 4.4 and 7.4). 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 serious flooding and/or salt water intrusion within two crop cycles, growers and planters should consider ceasing replanting and implement rehabilitation. Reporting shall include identification of total area of peat lands within the company land bank, the area of peat lands that is planted and the emissions associated with its cultivation. 		

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>Company.</p> <p>7.8.1: The carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development shall be identified and estimated.</p> <p>7.8.2: There shall be a plan to minimise net GHG emissions which takes into account avoidance of land areas with high carbon stocks and/or sequestration options.</p>			
<p>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 tonne of CPO).</p>	<p>1.2.1 All the documents that are publicly available are listed on the web site. Not all documents are available in hard format as they are expensive to produce. They are available for review, as are all internal documents.</p> <p>From the Agropalma website: “Available documents, among others: Title deed and other land related documents; Occupational Health Medical Control Program, Environment risk prevention programs, PAE, Technical Report of Working Environment Conditions; ECP, ECR, EIS, Probe Diagnostics and other socio-environmental studies; Documents related to reviews of areas of high conservation value; Integrated Management System Manual, Rules of Procedures and Operational Routines; Claim Details Report; Long term Economic and Financial Sustainability Plan; Negotiation and Land Acquisition Procedures; Continuous Improvement Plan; RSPO certification reports; Respect for Human Rights Policy (still being developed); Current and historical prices paid to FFB suppliers”.</p>	<ul style="list-style-type: none"> • All sources of GHG emissions, including those related to land use and non-land use activities, shall be identified and monitored using the RSPO Palm GHG methodology or equivalent • Targeted reductions of non-land use related GHG emissions (per tonne of CPO) shall be defined. • Bi-ennial GHG emissions from all sources and progress towards the targeted reductions of non-land use related emissions shall be publicly reported, 	<p>Based on the tool Palm GHG Calculator e Agropalma Sustainability Report 2013 (draft), and the subcontracted/independent study conducted in 2009; it was concluded that POME was the major residue responsible for GHG accountability emissions. However, no emission reduction targets for a given time have not been defined.</p> <p>A 2009 study (i.e. Study contracted in 2009 with the Company Delta CO₂ – Environmental Sustainability - Carbon footprint of palm oil produced by Agropalma grou (Abril 2011), indicated that major GHG emission arose from POME, Fuels and Fertilizers.</p> <p>For all three factors there are not concrete studies for emission reduction considering available alternatives (i.e. GHG emission reduction as a function of fertilizer types, use of slow release fertilizer sources, organominerals, etc.).</p> <p>It is observed that the Company will adopt a methodology for GHG anual emissions monitoring.</p> <p>The Report on GHG Emissions Generated by the</p>	<p>Partial Justification: no reduction targets defined and at the time of the audit report was not made public. Now available in GRI report.</p> <p>Biodiversity protection reported to fauna was included due to RSPO indicator related being related to item POIG 1.3.</p>

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>Comments relating directly to the list of documents in the list in the column on the left:</p> <p>Land Titles/user rights:</p> <p>1a. Contact person: Mr. Antonio Pereira Da Silva, General Affairs Manager,</p> <p>1b. Supporting documents: all land titles/user rights for planted areas available for review. See 2.2.1. below for details.</p> <p>Policies for workers:</p> <p>2a. Contact person: Mr. Tulio Dias, Social and Environmental Manager.</p> <p>2b. Supporting document:</p> <p>2b1. Manual de Conduta dos Colaboradores do Grupo Agropalma, 08/2008.</p> <p>2b2. Worker Negotiation procedures as indicated in current Acordo Coletivo de Trabalho 2014/2015, Número Da Solicitacao MR018181/2014.</p> <p>Integrated System Management:</p> <p>3a. Contact person: Mr. Tulio Dias, Social and Environmental Manager.</p> <p>3b. Supporting document:</p> <p>3b1. Manual Do SIG, No. MSIG; 15-04-2013, Revisao 18 (Integrated System Management Manual).</p> <p>5.6.1 All polluting activities are assessed. Partly in PGRS for solid waste. Gaseous emissions are monitored from the POM boiler. They have started to use the software from RSPO.</p> <p>Since 2009, the company has been considering GHG gases. In 2013 tow managers attended RSPO training in Kuala Lumpur. The RSPO GHG assessment tool is being used.</p> <p>The sources of emissions and sequestration are identified.</p> <p>Land clearance in the past was the main source of GHG. This cannot be managed. There are emissions from fertiliser and fuel. Main emission is POME and</p>		<p>Company has not been made public.</p> <p>IBD Comments: applicable. Easy to check,</p>	

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>this is covered elsewhere in this document.</p> <p>Crop sequestration of GHG and there are 64,00ha of forest reserve.</p> <p>The model potentially shows a net sequestration of carbon.</p> <p>However, by being conservative, there is 1.62 mt of CO2 released per 1mt of CPO produced. However, if the conservation blocks are considered to be sequestering 2mt per ha per ha of C, (Equivalent to 7.333 mt CO2) then the result is that the company is capturing 1.5 mt CO2 per year.</p> <p>5.6.2 Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented.</p> <p>5.6.3 A procedure to monitor all gas emissions and liquid waste from the mills is being revised. No NPG 36.</p> <p>RSPO Palm GHG tool is being used.</p> <p>7.8.1: Planted between 2006 and 2010 before this indicator was introduced to the P&Cs. See also P5.6.</p> <p>7.8.2: No peat has been planted. Roads are well constructed and maintained which increases vehicle efficiency. The mills are located within 15 km. A new mill is being built.</p> <p>8.1.1 The company has an action plan covering the 6 topics as required. It includes an evaluation and conclusion.</p> <p>With regard to use of pesticides, this is considered in terms of the active ingredient as well as the quantity. Cmp VI is organic.</p>			

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>Since 2012 to date, full mechanisation has been implemented for herbicide use. Reduction in labour to 19 from a peak of over 100. The amount of active ingredient has increased but is limited too Glyphosate only. Two bands are sprayed. In 2012, 0.91 litres of glyphosate per ha. This has increased to 1.8 l/ha in 2014. The spraying is now more accurate and better controlled than before.</p> <p>Biodiversity protection. 2 ways: Protection program. In 2012 there were 19 occurrences of hunting and better conditions were given to the forest wardens. In 2013, the number of hunting incidents was 16. A new house was built and 2 were renewed. This makes the policing of the forest reserve more efficient.</p> <p>Fauna monitoring is made by Conservation International. In 2012 this monitoring was started and completed in 2013. The last monitoring the number of species identified in the reserves has increased. The palm plantations are now included in the monitoring. 449 species of bird. 52 species of medium to large mammals. 57 species of reptiles and 46 species of amphibians. 12 species are considered ERT.</p> <p>Waste reduction. POME treatment is to be improved. 2012 Malaysian companies were visited with a consultant company to look at bio-reactors.</p> <p>This company is now retained to advice on development for Agropalma. Methane capture from lagoons is now being developed and considered for all POMs. Visits to other companies in South America are being conducted. A new mill is being built with the potential for taking POME from another mill for methane capture.</p>			

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>In 2012 the company closed the old system for domestic waste and it is now delivered to specialist company. In 2013 a licence was obtained for a new garbage collection point was built in 2014. Recycling is carried out as much as possible. Dangerous residue is stored in a warehouse and then incinerated.</p> <p>GHG emissions. RSPO model is now used. See 5.6 for more details.</p> <p>Social impacts. In 2007 and 2008, a SEIA was conducted and 2 projects were implemented. Also Agropalma Women’s Association was created in 2013 this was legalised.</p> <p>Optimising the supply base. This started in 2013 with the identification of better genetic material and the mechanisation of activities due to a lack of a work force. Target of an average of 23.5 mt FFB/ha in 2013 – this was achieved. Target of 26 mt average over the period 204 to 2017. A sustainability report will be published in 2014.</p>			
<p>1.4 Pesticides use minimization: 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 by preference practice natural weed and pest control and IPM, and strive to avoid the use of toxic pesticides, only using them as an absolute last resort. There shall be full transparency of any pesticide use.</p>	<p>1.2.1 All the documents that are publicly available are listed on the web site. Not all documents are available in hard format as they are expensive to produce. They are available for review, as are all internal documents.</p> <p>From the Agropalma website: “Available documents, among others: Title deed and other land related documents; Occupational Health Medical Control Program, Environment risk prevention programs, PAE, Technical Report of Working Environment Conditions; ECP, ECR, EIS, Probe Diagnostics and other socio-</p>	<ul style="list-style-type: none"> Highly toxic, bio-accumulative and persistent pesticides (PBT) shall not be used. This includes chemicals listed by the following: <ul style="list-style-type: none"> World Health Organisation Class 1A or 1B Stockholm or Rotterdam Conventions FSC ‘Highly Hazardous’ list SAN prohibited pesticide list Paraquat <p>Emergency use of listed pesticides is permitted subject to POIG</p>	<p>Based on the implemented IMP program and evaluated documents, weed control and pest control are technically done using Round UP (Glyphosate), and Dipel (<i>Bacillus thuringiensis</i>) respectively. Palm Oil weevils (i.e. <i>Ryncosporum palmarum</i>) control is done by pheromone placing in mechanical traps.</p> <p>No evidence of Paraquat usage at this Company. Weed control at the Organic Department VI (i.e. 4,000 ha) is done mechanically by hand or tractor mounted equipment.</p>	<p>Partial At date the GRI report was not available. Now the report carries detailed information.</p>

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>environmental studies; Documents related to reviews of areas of high conservation value; Integrated Management System Manual, Rules of Procedures and Operational Routines; Claim Details Report; Long term Economic and Financial Sustainability Plan; Negotiation and Land Acquisition Procedures; Continuous Improvement Plan; RSPO certification reports; Respect for Human Rights Policy (still being developed); Current and historical prices paid to FFB suppliers". Comments relating directly to the list of documents in the list in the column on the left: Land Titles/user rights: 1a. Contact person: Mr. Antonio Pereira Da Silva, General Affairs Manager, 1b.Supporting documents: all land titles/user rights for planted areas available for review. See 2.2.1. below for details. Policies for workers: 2a. Contact person: Mr. Tulio Dias, Social and Environmental Manager. 2b. Supporting document: 2b1. Manual de Conduta dos Colaboradores do Grupo Agropalma, 08/2008. 2b2. Worker Negotiation procedures as indicated in current Acordo Coletivo de Trabalho 2014/2015, Número Da Solicitacao MR018181/2014. Integrated System Management: 3a. Contact person: Mr. Tulio Dias, Social and Environmental Manager. 3b. Supporting document: 3b1. Manual Do SIG, No. MSIG; 15-04-2013, Revisao 18 (Integrated System Management Manual).</p>	<p>Organising Committee approval.</p> <ul style="list-style-type: none"> IPM plans shall emphasize non-chemical weed and pest control, such that chemicals are only used as a method of last resort. Pesticide use and alternative methods used shall be included in public reporting. 	<p>This information has not been published since it is under review of document Agropalma Sustainability Report 2013; using as a reference model GRI.</p> <p>IBD Comments: applicable, easy to check.</p>	

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>4.5.1 A fully implemented organic IPM is used in Dept VI. Contact Person: Mr. Rubelino Pereira Dias, Chefe de Departamento Agricola I, No. 08663 (Weed Control), and Mr. Helton Resende De Oliveira, No. 18661, Sanidad Vegetal. Supporting documents: 1a. Capina Quimica Mecanizada, RO 09 IMP/017, Revisao 03, 20-07-2013; 1b. Controle Quimico areas conventional a serem aplicadas em 2014, Dept. I, 4820,49 ha, 3 cycles, Round Up WG (79,25%) at 0.62 kg ai/ha; and for Dept. II, III, IV, V, XV for January and February, 2014. 1c. Relatorio Mensual 2013, Dept. III, Año 2014, 1863,52 kg and 4635, 6 ha (Records of application); 1d. Biossat Agricola Software; 1d. Mapa Gerencia de Fitossanidade and Vermelha, Mayo 2014 (Map); 1e. Relatorio de No. de Captura de Rynchophorus palmarum-Departamento/ Mensual (IC 143); 1f. Levantamiento de desfolhadores-Geral (Copia) (ID: 804), 09-01-2013, Departamento V, 31.88 ha, 2013, January (Record); 1g. Levantamiento de desfolhadores, 22-01-2014, Dept. VII, 115.20 lagartas/hoja Sibine sp. (Acharia sp.) (Monitoring record); 1h. Control de Desfolhadores, RO 09 FIT/004, Revisao 11; 20-07-2013 (Procedure), and 1i. Relatorio Control Esfoliadores No. 185, Dept. VII. Dipel+Agral, 18 kg/ha E25 (0.720 gr/ha) (Record).</p> <p>4.5.2 Properly trained personnel is involved in IPM implementation (i.e. Mr. Ricardo Tinoco; Master Degree in Commercial Entomology and currently a Doctor´s Degree Candidate).</p> <p>4.6.1 All applications done based on scouting of pest and disease at field level as described in</p>			

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>Levantamiento de desfolhadores, 22-01-2014, Dept. VII, 115.20 lagartas/hoja Sibine sp. (Acharia sp.). Used products include Dipel (i.e. Bacillus thuringiensis) as a biological control agent for leaf worms.</p> <p>4.6.2 As indicated in reviewed records (i.e. Relatorio Control Esfoliadores No. 185, Dept. VII. Dipel+Agral, 18 kg/ha E25 (0.720 gr/ha).</p> <p>4.6.3 Weeds are controlled with localized applications of Glyphosate (Round Up) in combination with mechanical control. Its use is minimised by the use of mechanical application only. Manual knapsack spraying has been phased out.</p> <p>4.6.4 Only authorized Plant Protection Products used at this facility (i.e. Bacillus thuringiensis). No paraquat used at this company.</p> <p>The only herbicide used is Glyphosate.</p> <p>4.6.7 Weed control by chemical ways is done considering buffer zones and identified HCV and regeneration areas. Mechanical application by tractor only.</p> <p>4.6.8 No aerial applications done at this company as declared by Mr. Reinaldo de Souza Wanderley, No. 02947.</p> <p>8.1.1 The company has an action plan covering the 6 topics as required. It includes and evaluation and conclusion.</p> <p>With regard to use of pesticides, this is considered in terms of the active ingredient as well as the</p>			

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>quantity. Cmpt VI is organic organic.</p> <p>Since 2012 to date, full mechanisation has been implemented for herbicide use. Reduction in labour to 19 from a peak of over 100. The amount of active ingredient has increased but is limited too Glyphosate only. Two bands are sprayed. In 2012, 0.91 litres of glyphosate per ha. This has increased to 1.8 l/ha in 2014. The spraying is now more accurate and better controlled than before.</p> <p>Biodiversity protection. 2 ways: Protection program. In 2012 there were 19 occurrences of hunting and better conditions were given to the forest wardens. In 2013, the number of hunting incidents was 16. A new house was built and 2 were renewed. This makes the policing of the forest reserve more efficient.</p> <p>Fauna monitoring is made by Conservation International. In 2012 this monitoring was started and completed in 2013. The last monitoring the number of species identified in the reserves has increased. The palm plantations are now included in the monitoring. 449 species of bird. 52 species of medium to large mammals. 57 species of reptiles and 46 species of amphibians. 12 species are considered ERT.</p> <p>Waste reduction. POME treatment is to be improved. 2012 Malaysian companies were visited with a consultant company to look at bio-reactors. This company is now retained to advice on development for Agropalma. Methane capture from lagoons is now being developed and considered for all POMs. Visits to other companies in South America are being conducted. A new mill is being built with the potential for taking POME from</p>			

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>another mill for methane capture.</p> <p>In 2012 the company closed the old system for domestic waste and it is now delivered to specialist company. In 2013 a licence was obtained for a new garbage collection point was built in 2014. Recycling is carried out as much as possible. Dangerous residue is stored in a warehouse and then incinerated.</p> <p>GHG emissions. RSPO model is now used. See 5.6 for more details.</p> <p>Social impacts. In 2007 and 2008, a SEIA was conducted and 2 projects were implemented. Also Agropalma Women's Association was created in 2013 this was legalised.</p> <p>Optimising the supply base. This started in 2013 with the identification of better genetic material and the mechanisation of activities due to a lack of a work force. Target of an average of 23.5 mt FFB/ha in 2013 – this was achieved. Target of 26 mt average over the period 204 to 2017. A sustainability report will be published in 2014.</p>			
<p>1.5 Chemical fertilizer: To reduce climate and environmental impacts producers shall strive to minimize chemical fertilizer use, and preferentially use 'precision agriculture', organic fertilizers, and where possible use waste as a source of phosphorus. Phosphorus and nitrogen levels in water courses are monitored and disclosed.</p>	<p>4.2.1 Foliar analysis once per year. Fertiliser program based on foliar analysis. Contact Person: Mrs. Raquel Cristina Do Amaral Melo, No. 6203.</p> <p>Supporting documents: 1a. Exportación 12 meses-Adubacao Metodo Exportacion 2014; 1b. Foliar Analysis, CRAI, Resultado Analise Foliar Plano, 2014; Instituto Campineiro de Analise de Solo en Adubo, Ltda, 17.04.2014, Muestra ICASA No. 26252, 1c. Plan Adubacao 2014-Plantio en Producao,</p>	<ul style="list-style-type: none"> Use of chemical fertilisers shall be minimised. SOPs shall demonstrate preferential use of other methods to manage soil fertility, such as 'precision agriculture', the use of organic fertilisers and the use of organic residues as a source of nutrients, including those resulting from the processing of oil palm. Phosphorus and nitrogen levels in relevant water courses shall be monitored 	<p>The Company fertilization program considers bi-annual soil and annual foliar analysis for rational application of organic or inorganic fertilizers. The approach follows a precise nutrient balance made incorporating planted area productivity for calculation of final fertilizer quantities to be delivered per ha.</p> <p>Organic fertilization is done mainly at the Company Organic Planted Department (i.e. Department VI) by incorporation of EFFB and POME. At planted areas next to the Mills (i.e. 5,000 ha) POME is also applied.</p>	<p>Partial Absence of phosphorus and nitrogen monitoring.</p>

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>Conventional Dept. III (KCl, Urea, Ammonium Sulphate) and Organic VI Palmares (Potassium Sulphate, Magnesium Sulphate); 1d. Yara, 26-07-2014, 32 Ton fertilizer invoice No. 3683; 1e. Ticket de Pesagen, No. 288505, 29-07-2014.</p> <p>4.2.2 Records are maintained. Contact Person: Mrs. Raquel Cristina Do Amaral Melo, No. 6203. Conventional Production: 1a. Control diario de Producao, 05-07-2014, A02 by MR. Manuel, No. 8701; 6396.56 kg and 1253 plantas, Depat. V.</p> <p>4.2.4 EFB, Crushed kernels and POME are distributed in the organic production department of Palm Oil in accordance with the foliar analysis. All materials are based on 60 mt / ha / year with 2 applications per year – for all matter except POME.</p> <p>Agropalma Mill: All POME is used for land irrigation over designated areas as described in Tratamiento, Aplicacao e Fiscalizacao de Efluentes e Controle de Assesoreamento das Lagoas, RO 09 Ext/10 A. See also 4.4.3 below.</p> <p>4.4.1 Agropalma Mill: Licence to use water. No 1420/2014, Vaid until 30-07-2018. Río Acará, 02° 32' 42'' S; 48° 42' 10,4'' W, uso é industrial e doméstico. 1804 m3 per hour. There is no potential technology that will reduce water consumption. Considering the technology, the company monitors the consumption of water and there are situations where they can recycle. There is a lot of rain and water availability. Before a licence is granted, research work was done to analyse the water use and the capacity of the</p>	<ul style="list-style-type: none"> Results of phosphorous and nitrogen monitoring in water courses shall be included in public reporting 	<p>Reference documents: 1. Rotina Operacional, Tratamento, Aplicação e Fiscalização de Efluentes e Controle de Assoreamento das Lagoas, RO 09 EXT/10; 2. Exportación 12 meses-Adubacao Metodo Exportacion 2014; 3. Foliar Analysis, CRAI, Resultado Analise Foliar Plano, 2014; Instituto Campineiro de Analise de Solo en Adubo, Ltda, 17.04.2014, Muestra ICASA No. 26252, 4. Plan Adubacao 2014-Plantio en Producao, Conventional Dept. III (KCl, Urea, Ammonium Sulphate) and Organic VI Palmares (Potassium Sulphate, Magnesium Sulphate).</p> <p>At the time of the present verification no monitoring of nitrogen and phosphorus contents in water was available for cultivated areas. However, a preliminar plan for its implementation was in place (i.e. selection of monitoring sites, and a contract review with an expert service supplier (FUNPEA (Fundação de Apoio a Pesquisa, Extensão e Ensino em Ciências Agrárias)).</p> <p>IBD Comments: Applicable and easy to check.</p>	

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>bore hole. An analysis was made in 2012</p> <p>4.4.2 The company has identified all riparian zones and has introduced a system of Permanent Protection Areas (PPA). These are created by pushing over a row of palms along a line up to 200m from the river or riparian zone. Between this line and the water, no work is under-taken at all and regeneration takes place. Once the palms have rotted, the PPA is well established and fully identifiable.</p> <p>All water courses and wetlands, including restoring riparian and buffer zones were properly managed (i.e. 02°16'44' S 48°39'47' W).</p> <p>Agropalma Mill: Water is abstracted from Acará Rivers and POME is used for land irrigation. Therefore no riparian zones or communities are affected.</p> <p>There are 2 bore holes and the ground water is analysed every 6 months to determine if the lagoons are affecting the ground water quality. The results of the analysis show that the parameters are within the legal requirements and the conclusion is that no damage to ground water is taking place.</p> <p>AGROPALMA MILL:</p> <ol style="list-style-type: none"> 1. POCO No. 1 Montante: Monitoramento 10-09-2013. 2. POCO No. 2 Jusante: Monitoramento 19-09-2013. <p>4.4.3 Agropalma Mill: All POME is treated in a series of lagoons and the final discharge is for land irrigation. This is covered by procedure Tratamiento, Aplicacao e Fiscalizacao de Efluentes e Controle de Assesoreamento das Lagoas, RO 09</p>			

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>Ext/10 A. Control to avoid damage to soils and flooding with careful application. The Brazilian Law does not establish a limit of BOD but soil analysis must be carried out. A study was carried out over a 5 year period and the soil was analysed. The result was an improvement in the soil. The POME treatment takes into account the rainfall and the quantities of POME are recorded. Data related to the volume entering the lagoon and the volume leaving allowing the efficiency of the system to be analysed.</p> <p>4.4.4 The use of water is fairly consistent and shown on a chart by month compared to the target of 4.7mt. The lowest use was in January 2014: 4.1mt per mt of CPO and the highest was 6.6mt in July. The higher rate was due to extensive cleaning of the mill prior to shut down for maintenance.</p> <p>5.3.1 PGRS. No NPG 30. Technical document with detailed procedures for each sort of waste. Storage, transport and disposal. All waste is analysed in accordance with the law and disposed of accordingly. The environmental manager is responsible and the PGRS is related to the licences. Annex 1 of the PGRS details the waste by type, Origin, category in relation with the law, Annual quantity averages. E.G. Waste mineral oil. Where and how it is stored. How it is transported and then re-cycled. 290kg in January 2014. 2,050 kg in Feb 2014. There is a storage tank with a capacity of 5,000 litres.</p> <p>Licence to operate a waste collection pint. LO No 013/2014. Valid to 10/04/2016.</p> <p>The emissions from the boiler are analysed every 6 months. All results are within the legal parameters. Jan 2013. Sulphur: 438 g/million de Kcal. Legal limit</p>			

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>2,000</p> <p>All waste sources evaluated (i.e. used engine oil, empty Plant Protection Product containers), where properly handled through Associacao Do Comercio Agropecuario Do Para (ACAP), Licenca de Operacao No. 8260/2013, valid 05-12-2015, and Nota Fiscal NF-e 2195, 02-07-2014 (Dipel WP and Roundup), and by Coleta, Transporte, Tratamento (Incineracao) e Destinacao Final de Residuos Industriais e Hospitalares, Licenca de Operacao 3317/2009, SEMA/PA for toxic and harmful residues.</p> <p>5.3.3 PGRS is the plan and cover all activities for the AGROPALMA mill and the supply base.</p> <p>In 2012 the company closed the old system for domestic waste and it is now delivered to specialist company. In 2013 a licence was obtained for a new garbage collection point was built in 2014. Recycling is carried out as much as possible. Dangerous residue is stored in a warehouse and then incinerated. Recycling of metal as much as possible. Separate bins for paper, plastic and other.</p> <p>Communication to SEMA on 16/10/13 presenting results of monitoring gaseous effluents analysis related with the sample collected on Abril/2013. According with CONAMA 08/90 the results are in accordance; Analysis water certificate collected in the well 01 (amount), well 02 (downstream) and lane 3 (downstream) at effluent treatment station on 21/03/14. In conformity with CONAMA 357/2005 ref. Art 16 portaria 518/2004; Certificate heat treatment of Waste No 0302-2/2014/PATT e No 09972/2014/PATT related with chemicals generated on 24/04/2014 and 11/06/2014 of</p>			

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>wastes generated by Agropalma's Mills and destined to Transcidade Serviços Ambientais Eireli – EPP – Cidade Limpa Ambiental; Letter to Pará Environmental Agency (SEMA) on 14/04/2014 showing results of the effluent analysis discharged at river. All results are in accordance with CONAMA 357 de 2005 art 34; Routine “Descarte de resíduos laboratoriais” RO10 EXT/024 Ver. 04 that establish how and which kind of waste generated at laboratories should be discharge.</p>			
<p>1.6 GMOs prohibition: The cultivation of GMOs in the management area is prohibited.</p>		<ul style="list-style-type: none"> No cultivation of GMOs within the management area shall be permitted. 	<p>According to the national regulatory agency for GMO's of Brazil (i.e. CTNBio) Genetically Modified Palm Oil plants can not be planted in Brazil or at Grupo Agropalma, S.A. It is internationally known that not Palm Oil GMO's are available for comercial usage.</p> <p>IBD Comments: Applicable and easy to check.</p>	<p>Full</p>
<p>1.7 Water accountability: The quality and quantity of water is maintained with responsible water management adopted including minimization and disclosure of water use, pollution elimination, equity with other users, and consideration of catchment level impacts of irrigation.</p>	<p>4.4.1 Agropalma Mill: Licence to use water. No 1420/2014, Vaid until 30-07-2018. Rio Acará, 02° 32' 42'' S; 48° 42' 10,4'' W, uso é industrial e doméstico. 1804 m3 per hour. There is no potential technology that will reduce water consumption. Considering the technology, the company monitors the consumption of water and there are situations where they can recycle. There is a lot of rain and water availability. Before a licence is granted, research work was done to analyse the water use and the capacity of the bore hole. An analysis was made in 2012.</p> <p>4.4.2 The company has identified all riparian zones and has introduced a system of Permanent Protection Areas (PPA). These are created by pushing over a row of palms along a line up to 200m from the river or riparian zone. Between this line and the water, no work is under-taken at all</p>	<ul style="list-style-type: none"> Water consumption across plantation operations shall be monitored. The water management plan shall include measures to minimise and/or reduce water consumption by plantations and mills. For plantations that use irrigation, the water management plan shall demonstrate that the application of water is not excessive or wasteful, by taking into account water availability and the impacts of consumption. Water consumption by plantations and mills shall be included in public reporting. 	<p>Within farm premises there is a nursery area of 65 ha where central pivot irrigation is performed. Water consumption for this area is daily registered by a Hydrometer, and the irrigation department expects a 6,3% reduction in consumption in irrigation water through substrate improvement to augment water holding capacity retention.</p> <p>Reference documents: 1.Outorga Rio Acará No 1420/2014 validity until 30/07/2018, with authorized consumption of 1.804 m3/day. 2. Historic of water consumption in the nursery done in 10/08/2013, 290 m³/day.</p> <p>An irrigation research project is also under evaluation. Water applications are done from July to mid November, and daily records of water</p>	<p>Partial</p> <p>In Agropalma case the water use does not constrain the use by others. The water consumption water is authorized by state through specific allowances and the limit may not be extended. The allowances are available in internet and</p>

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>and regeneration takes place. Once the palms have rotted, the PPA is well established and fully identifiable.</p> <p>All water courses and wetlands, including restoring riparian and buffer zones were properly managed (i.e. 02°16′44″S 48°39′47″ W).</p> <p>Agropalma Mill: Water is abstracted from Acará Rivers and POME is used for land irrigation. Therefore no riparian zones or communities are affected.</p> <p>There are 2 bore holes and the ground water is analysed every 6 months to determine if the lagoons are affecting the ground water quality. The results of the analysis show that the parameters are within the legal requirements and the conclusion is that no damage to ground water is taking place.</p> <p>AGROPALMA MILL:</p> <p>1. Poco No. 1 Montante: Monitoramento 10-09-2013.</p> <p>Poco No. 2 Jusante: Monitiramento 19-09-2013.</p> <p>4.4.3 Agropalma Mill: All POME is treated in a series of lagoons and the final discharge is for land irrigation. This is covered by procedure Tratamiento, Aplicacao e Fiscalizacao de Efluentes e Controle de Assesoreamento das Lagoas, RO 09 Ext/10 A. Control to avoid damage to soils and flooding with careful application. The Brazilian Law does not establish a limit of BOD but soil analysis must be carried out. A study was carried out over a 5 year period and the soil was analysed. The result was an improvement in the soil. The POME treatment takes into account the rainfall and the quantities of POME are recorded. Data related to the volume entering the lagoon and the volume</p>	<ul style="list-style-type: none"> The water management plan shall include measures designed to minimise and/or reduce pollution from both plantations and mills. The measures in the water management plan shall be designed to ensure that the needs of other users are identified and accommodated. 	<p>consumption kept.</p> <p>Water irrigation applied is calculated considering rainfall, evapotranspiration, temperature, radiation, and plant requirements (i.e. water balance).</p> <p>Reference documents:</p> <ol style="list-style-type: none"> Outorga Igarapé Água Preta No 743/2012 validity until 19/06/2016, with authorized consumption of 3.600 m³/day; Historic of water consumption in the experiment made on 31/08/2013, 1000 m³/day; <p>All this information and that corresponding to water management from the Company Mills is not published since is under preparation as detailed in document Agropalma Sustainability Report 2013, using as a base GRI model.</p> <p>Pollution of agricultural and protected areas is minimized by plant protection products application in absence of rainfall, and respecting buffer zones in HCV areas. Fertilizers are applied localized to reduce runoff and superficial water contamination.</p> <p>At Mill level ground water is monitored at wells located at entrance and exit points of POME lagoons (i.e. AGROPALMA MILL; 1.Poco No. 1 Montante: Monitoramento 10-09-2013, and Poco No. 2 Jusante: Monitiramento 19-09-2013).</p> <p>IBD Comments: Applicable and easy to check.</p>	<p>the Environmental Agency once issuing allowance guarantees that the water use level will not interfere in communities nor in availability in general.</p>

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>leaving allowing the efficiency of the system to be analysed.</p> <p>4.4.4 The use of water is fairly consistent and shown on a chart by month compared to the target of 4.7mt. The lowest use was in January 2014: 4.1mt per mt of CPO and the highest was 6.6mt in July. The higher rate was due to extensive cleaning of the mill prior to shut down for maintenance.</p> <p>7.1.1 Diagnostico e Elaboracao dos projectos Socioambientais para a Agroplam usando a implementacao de un programa de responsabilidad social, abril de 2008. The entire area purchased fo rnew planting was subject to an SEIA. See also P5.</p> <p>7.1.2 Diagnostico e Elaboracao dos projectos Socioambientais para a Agroplam usando a implementacao de un programa de responsabilidad social, abril de 2008. The entire area purchased fo rnew planting was subject to an SEIA. See also P5.</p> <p>8.1.1 Diagnostico e Elaboracao dos projectos Socioambientais para a Agroplam usando a implementacao de un programa de responsabilidad social, abril de 2008. The entire area purchased fo rnew planting was subject to an SEIA. See also P5.</p>			
<p>1.8 Protect and conserve wildlife: Following comprehensive biodiversity surveys to identify HCV 1-3, in addition to ensuring the protection and survival of all rare,</p>	<p>5.2.1 Contact Person: Ana Paula Ferreira De Brito, No. 03203, Analista Responsabilidad Sociambiental. Support Document: 1.Monitoramiento de Fauna e Flora no Complexo</p>	<ul style="list-style-type: none"> Where HCV 1-3 have been identified, management plans shall include measures designed to contribute to the protection and survival of all rare, threatened or endangered 	<p>Grupo Agropalma, S.A. has developed a forest protection program dated back to 2008. This includes daily surveillance activities in HCV areas which include trap removal, and local community's interaction activities to minimize</p>	<p>Full Full data available in CI reports and Ecosocial</p>

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
<p>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>Agroindustrial Do Agropalmas, Nov-Dez-2012 e Jan.2013 by Conservacao International, 15-01-2014; Biannual Report.</p> <p>5.2.2 Proper buffers zones have been implemented to protect forest or HCV areas as described in Monitoramiento de Fauna e Flora no Complexo Agroindustrial Do Agropalmas, Nov-Dez-2012 e Jan.2013 by Conservacao International, 15-01-2014; Biannual Report. Several RTE and new species have been found in protected areas (i.e. Libellula herculean Karsch, 1889, and Epipleoneura tariana, Machado 1985); which are protected under HCV and forested zones of the company.</p> <p>5.2.3 There are no RTE species affected by oil palm operations.</p> <p>5.2.4 As described in Monitoramiento de Fauna e Flora no Complexo Agroindustrial Do Agropalmas, Nov-Dez-2012 e Jan.2013 by Conservacao International, 15-01-2014; Biannual Report.</p> <p>5.2.5 All land dedicated to protection legally belongs to Agropalma, S.A.</p> <p>7.3.1 An SEIA has been completed. Diagnostico e Elaboracao dos projectos Socioambientais para a Agroplam usando a implementacao de un programa de responsabilidad social, abril de 2008. Monitoramiento de Fauna e Flora no Complexo Agroindustrial Do Agropalmas, Nov-Dez-2012 e Jan.2013 by Conservacao International, 15-01-2014; Biannual Report.</p> <p>7.3.2 No HCV identified in the new planting areas.</p>	<p>species in the landscape beyond the management area.</p> <ul style="list-style-type: none"> Positive contribution to the survival of all rare, threatened or endangered species in the wild shall extend beyond the concession and/or geographical presence. Management plans include measures to protect native plants and animals, especially endangered species, and prevent the poaching of endangered species in all operation areas. 	<p>poucher intrusions to protected areas. The surveillance team is composed of 40 persons who are directly employed by the Company.</p> <p>Since the second fauna and flora monitoring program done in 2004, today under the responsibility of Conservational International (i.e. CI), monitoring actions were limited only to HCV areas. Recently, it was decided to include production areas as described in the 2012/2013 Bi-annual report (i.e. Monitoramiento de Fauna e Flora no Complexo Agroindustrial Do Agropalmas, Nov-Dez-2012 e Jan.2013 by Conservacao International, 15-01-2014; Biannual Report).</p> <p>Grupo Agropalma, S.A. is recognized for its support to the Orangutan Land Trust, Indonesia with quartely transfers of £10,000 since March, 2014.</p> <p>IBD Comments: Applicable and easy to check.</p>	<p>Programs. These are obtainable if necessary.</p>

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>The company has retained forest cover in accordance with Brazillian Law.</p> <p>7.3.3 There are records of all planting. See tables in public summary.</p> <p>7.3.4 No HCV in the planting areas.</p> <p>7.3.5 SEIA. See also P6.</p>			
2. Partnerships with Communities				
<p>2.1 Free, Prior and Informed Consent (FPIC) of indigenous peoples and local communities: 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</p>	<p>2.2.1 The offices of the General Affairs Manager was visited to review the documents related to land ownership.</p> <p>All documentation was reviewed and all land titles were found to be in order. The history of ownership and transfer was reviewed and found to be complete.</p> <p>Contact Person: Mr. Antonio Pereira Da Silva, General Affairs Manager.</p> <p>Supporting Documents:</p> <p>1.Sexto Tabelinato de Nota Da Capital, Escritura de Compra, Livro 2168, Fls. 280 (i.e. land purchase document).</p> <p>2.Titulo Definitivo Osvaldo Miranda Cruz, CPF No. 0675333291-53, Lote Rural No. 05 (Land Title).</p> <p>3.Fazenda Sempre Verde, Cartorio Diniz-2do Oficio de Notas, Livro 572, Fohla 033, Titulo Definitio (Land Certificate).</p> <p>4.Definitivo de Venta de Terras, No. 098, 05-07-1962; Certidao de Inteiro Teor, 21-11-2011 (Land Purchase Certificate).</p> <p>5.Fazenda Castanheira, Castanheira I, Castanheira II e Castanheira IV, Livro 570, Fohla 060; Cartorio</p>	<p>As part of the process for identifying legal, customary or user rights and impacts on rights holders for new and existing operations, resourced access to independent expert advice shall be offered at each stage of an FPIC or conflict resolution process to affected communities.</p> <ul style="list-style-type: none"> Processes of consultation and negotiation shall not be constrained by local legal frameworks. The acquisition or replanting of existing plantations shall include measures to ensure redress for any issues arising from inadequate FPIC processes when those plantations were established. Participatory surveys will identify HCV's 4, 5 and/or 6 that existed before areas were converted to oil palm. Land shall not be acquired through expropriations in the national interest (eminent domain). 	<p>Risks Maps related with the communities/local stakeholders; Diagnostic and elaboration of Agropalma's social and environmental projects aim to implement a Social Responsibility Program made by Conservation Internacional and Peabiru Institute, April, 2008.</p> <p>Grupo Agropalma, S.A. did not provide access to interested third parties on implemented service contract for this initial stage study.</p> <p>All replanting Palm Oil areas are free of previous issues arising from inadequate FPIC process according to reviewed legal documents.</p> <p>Economical and Financial Sustainable Plan of long term made at February/2011, that establish the compromise with respect the law. Company only buy if the seller has a legal document of the area, using transparence skills to pay a fair price.</p> <p>IBD Comments:</p> <p>Inconsistency is a fact because 40 ha land was purchased;</p> <p>Transparence skills means here open and fair negotiation process through formal proposal</p>	<p>Not applicable in case of indipendant expert advice availability. At time of last land purchase, the POIG document/criteria/indicators did not exist.</p> <p>Full compliance for other items.</p> <p>In relation to land disputes with communities they do not exist. The only dispute existing is with private person and described in column two.</p>

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
<p>domain').</p>	<p>Diniz-2do Oficio de Notas Livro 570 Fohla 060; Titulo Definitivo de Venta de Terra No. 075, and Certidao de Interno Tor, 11-11-2011 (Land Title).</p> <p>6.Fundacion Agropalma, Cartorio Do Unico Oficio de Acará-Estado Do Para, Livro 24, Fohlas 86-V/((, Traslado Primeiro, 29-10-1982; Titulo Definitivo, Agará, Cadastro 00667, Talonario No. 03, Fohla 078 (Company Foundation Certificate);</p> <p>7. Certidao Registro de Imoveis, Registro General, Livro No. 2-E, Fohla 170.Lote 00611, Solicitud instituto de Terras Do Estado ITERPA 201.493182, 17-10-2013 (Company Registration Certification).</p> <p>2.2.2 From the legal documents, maps are prepared. In the field, there are panels to show the boundary. At all corners with neighbours there are concrete topographic marks. i.e. EBO, M 1181, 02°15'54'' S; 48°41'58''W, and EBO M 1178, 02°16'29'' S; 48°42'17'' W.</p> <p>2.2.3 Land dispute: Contact Person: Mr. Antonio Pereira Da Silva. Disputed areas: 1.Lote 21, 46, 47 and 48; area 6, Protocolo 2032/75, AGROPALMA for 500 ha. 2.Fazenda 3 Estrellas, for 1089 ha Reinvocatoria No. proceso 000421-04.2014.8.14.0076. 3.Agropalma, for 625 ha, Proceso No. 906/57. 4.Casa Natal (Fazenda Trevo), for 3237.3 ha, Proceso 6856/1974. Supporting documents: 1.Notificacion by Galvao Marinheiro, Flavio Galvao, 11-11-2013 (Lawyer firm representing Mrs. Da Silva dispute). 2. Levantamiento Planiamétricos Caadastral, 01-10-2013 (Affected areas map). 3.Confidential Technical Note of Judicial Process,</p>		<p>setting and paying to market value price, buying directly from owner.</p> <p>Agropalma specific explanation: this land was purchased due to strategical location, neighbouring it's own farms. The former owner was the one to offer the sale.</p> <p>The Company focuses its land purchases to large land owners. However, small holder land purchases were done based on the land location and considering Company's strategic operations.</p> <p>The new land acquisition procedure was available for review (i.e. Grupo Agropalma, Gerencia Geral Administrativo-Financiera Gerencia de Reponsabilidade Socio-Ambiental, Fevereiro/2011).</p> <p>Payments for purchased land are based on local market land prices and are freely agreed among interested parties.</p> <p>Land purchased are legally registered at the official registration office (i.e. Cartório; itulo Definitivo Osvaldo Miranda Cruz, CPF No. 0675333291-53, Lote Rural No. 05 (Land Title), and Fazenda Sempre Verde, Cartorio Diniz-2do Oficio de Notas, Livro 572, Fohla 033, Titulo Definitio (Land Certificate).</p> <p>A case of land purchased on 2013 from a local small holder (i.e. Jose Maria Costa Da Silva, 40 ha at Tailandia) was verified through personal interview. The process as declared by Mr. Costa was free, transparent and based on local practice. Payment in done in cash.</p>	

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>Cases 1 to 4 (Agropalma Lawyer Internal Analysis of Dispute).</p> <p>4. Instituto de Terras Do Pará, Solicita Legitras Do Pará, Processo 6856/1979. Herdeiros de Antonio Goncalves Da Silva, DJA 1665 (State Oficial Analysis of previous owner land register).</p> <p>5. Medida Cautelar de Producao Antecipado de Prova 000 5501-80, 2013.8.14.0076 and Protocolo 2013.03852872-14; 18-02-2013 (Agropalma Court Plea upon land dispute presentation by lawyers representing Mrs. Da Silva).</p> <p>6. Plotage Dos Titulos Definitivos de Propriedade Da Agropalma, S.A. Municipios de Acará, Tailandia, Roju e Tome-Acu-Para, Junho, 2014, Agrimensor CREA-PA-45TA (Official Register Certificate of Land Tenue of Agropalma).</p> <p>7. Landsaat Picture 22362/2004, Zone 22 S, of affected or disputed planted areas.</p> <p>8. Titulo Definitivo 1143, Talonario 65, Livro 1, Registro 11453, Caadastro 5490 C06/77 a 81 (4) (Official evidence of land tenure of Agropalma planted area).</p> <p>9. Agropalma’s Communication of Land Dispute date 21-03-2014: Email to Mr. Darrel Webber, RSPO 26-03-2014 (Responded on 26-03-2014); and IBD on 27-03-2013 by Mr. Marcelo Brito.</p> <p>Notes:</p> <p>1.The land dispute resolution is pending a technical expert review, as indicated in Judicial Instruction given by Mr. Wilson De Souza Correa, District Judge, 01-07-2014.</p> <p>2.Title possession documents show that all disputed plots belonged, according to government valid documents, to Agropalma, S.A.</p> <p>3. Dispute presented after more than 20 years of continuous planting, and initiation of land re-planting cycle.</p>		<p>Comment IBD: Purchased area dos not mean necessarily expanded plantation.</p> <p>Regarding “was free, transparent and based on local practice” please check comments above in same item.</p> <p>Land expropriations are not applicable to this company according to applicable legislation.</p> <p>IBD Comments: Applicable and easy to check.</p>	

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>The audit team is satisfied that the company is acting in a responsible manner.</p> <p>2.2.4 See above.</p> <p>It is noted that Agropalma have held land titles for over 20 years. The resolution process is well advanced.</p> <p>2.2.5 The disputed areas are all mapped: Laventamiento Planiaametricos Cadastral 1st November 2013. Alos Landsaat Picture 22362/2004 Zone 22S.</p> <p>2.2.6 Oil palm has been cultivated for over 20 years.</p> <p>2.3.1 No customary rights specific to the area covered by the land titles. The location of the oil palm plantations was selected specifically to avoid any areas with customary rights. A full report was prepared in 2008 which did not high light any customary rights.</p> <p>2.3.2 The land titles are in place for the land and land titles were and are clear.</p> <p>2.3.3 Portuguese is the local language and all documents are in Portuguese.</p> <p>2.3.4 This is an individual dispute without community involvement.</p> <p>6.4.1 Documents verified: Economical and Financial Sustainable Plan of long term made at February/2011 that establish the compromise with respect the law. Company didn't buy any new area last year and only buy if the seller has a legal document of the area, using transparence skills to pay a fair price;</p>			

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>Interviewed persons: Ana Paula (Social and environmental corporative analyst).</p> <p>6.4.2 Contact Person: Tulio Dias, Social and Environmental Manager. Support document: Acordo Coletivo de Trabalho 2013/2014, Número Da Solicitacao MR018181/2014, monitored by COBIL (Comissao Bilateral). Economical and Financial Sustainable Plan of long term made at February/2011, that establish the compromise with respect the law. Company didn't buy any new area last year and only buy if the seller has a legal document of the area, using transparence skills to pay a fair price; Interviewed persons: Ana Paula (Social and environmental corporative analyst).</p> <p>6.4.3 Worker Negatiation procedure as indicated in current Acordo Coletivo de Trabalho 2014/2015, Número Da Solicitacao MR08181/2014. Not applicable. No new acquisition area. Interviewed persons: Ana Paula (Social and environmental corporative analyst).</p> <p>7.5.1 The offices of the General Affairs Manager was visited to review the documents related to land ownership. All documentation was reviewed and all land titles were found to be in order. The history of ownership and transfer was reviewed and found to be complete. No customary rights specific to the area covered by the land titles. The location of the oil palm plantations was selected specifically to avoid any areas with customary rights. A full report was prepared in 2008 which did not high light any customary rights.</p>			

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>7.6.1 See 7.5.1. above. 7.6.2 See 7.5.1. above. 7.6.3 See 7.5.1. above. 7.6.4 See 7.5.1. above. 7.6.5 See 7.5.1. above. 7.6.6 See 7.5.1. above.</p>			
<p>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.</p>	<p>6.1.1 Documents verified: Risks Maps related with the communities/local stakeholders; Diagnostic and elaboration of Agropalma’s social and environmental projects aim to implement a Social Responsibility Program made by Conservation Internacional and Peabiru Institute ate April, 2008; Evaluation Report of Social and Environmental Impacts related of new plantings at new farms made in 2009 and 2010 at Tailândia and Tomé Açú cities, by Orbis Exceller;</p> <p>Interviewed persons: Ana Paula (Social and environmental corporative analyst).</p> <p>6.1.2 Documents verified: Diagnostic and elaboration of Agropalma’s social and environmental projects aim to implement a Social Responsibility Program made by Conservation Internacional and Peabiru Institute on April, 2008. Describes participation of communities; Evaluation Report of Social and Environmental Impacts related of new plantings at new farms made in 2009 and 2010 at Tailândia and Tomé Açú cities, by Orbis Exceller;</p> <p>Interviewed persons: Ana Paula (Social and environmental corporative analyst).</p> <p>6.1.3 Documents verified: Diagnostic and elaboration of Agropalma’s social and environmental projects aim to implement a Social Responsibility Program made by Conservation</p>	<ul style="list-style-type: none"> • SIA and/or HCV assessments and participatory land use planning shall include analysis of food security issues for indigenous and local communities affected by the plantation operations. The scope of the food security assessment shall include additional impacts that oil palm production operations may have on relevant requirements including land, water, labour and infrastructure as well as substitutability between income generation for food purchase and subsistence food production. • Plans for avoidance or mitigation of negative impacts and promotion of positive impacts shall include measures to maintain or strengthen food security, including not undermining local control of and diversity of food production systems. • Measures designed to maintain or enhance local food security shall be included in participatory planning, including transparency in any land allocation process. • Evidence that measures identified in 	<p>Risks Maps related with the communities/local stakeholders available for review at the time of the verification audit.</p> <p>Diagnostic and elaboration of Agropalma’s social and environmental projects aim to implement a Social Responsibility Program made by Conservation Internacional and Peabiru Institute ate April, 2008.</p> <p>Food Security aspects were not identified initially as an aspect impacting small holders. However, initial studies and diagnosis did not address the topic as required by this principle.</p> <p>Recent studies have identified the need to diversify small holders farming activities and food base supply; incorporating women and young people in the process (i.e. Relatorio Final Año IV, Instituto Peabiru, 24-07-2013). This study included a methodology for active participation of small holders in the identification and characterization of farming and employment alternatives from a Social Security perspective.</p> <p>Grupo Agropalma, S.A. decided at corporate level to suspend momentarily any expansion activities since 2012.</p> <p>Small holder farms have left an area designated for farming or diversification of the family food</p>	<p>Not applicable. No new plantings in cooperation with local communities after the publication of POIG indicators.</p> <p>However it is clear that 97 farmers out of 192 do cultivate extra subsistence crops.</p>

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>Internacional and Peabiru Institute on April, 2008. Describes participation of communities; Evaluation Report of Social and Environmental Impacts related of new plantings at new farms made in 2009 and 2010 at Tailândia and Tomé Açú cities, by Orbis Exceller;</p> <p>Interviewed persons: Ana Paula (Social and environmental corporative analyst).</p> <p>6.1.4 Documents verified: Social Project Management reviewed on July, 2014 that establish the continual of the Social Programs; Interviewed persons: Túlio Dias (Social and environmental Manager); Ana Paula (Social and environmental corporative analyst).</p> <p>6.1.5 Documents verified: Smallholders are not involved with this operation at this time; Interviewed persons: Ana Paula (Social and environmental corporative analyst).</p> <p>7.1.1 Diagnostico e Elaboracao dos projectos Socioambientais para a Agroplam usando a implementacao de un programa de responsabilidad social, abril de 2008. The entire area purchased fo rnew planting was subject to an SEIA. See also P5.</p> <p>7.1.2 See above and P5</p> <p>7.1.3 See above and P5</p> <p>7.3.5 Documents verified: Risks Maps related with the communities/local stakeholders; Diagnostic and elaboration of Agropalma’s social and environmental projects aim to implement a Social</p>	<p>assessments and planning are being implemented and are effective.</p>	<p>base supply (i.e. 2 ha). Alternatives were presented for cultivation of such areas but the end results indicated that proposed alternatives were not fully accepted/implemented by participating farmers. Instead small areas next to growers housing facilities were planted for subsistence foods (i.e. bean, cassava, maize).</p> <p>According to document Diagnóstico Socioeconomico-Censo Agricultra Familiar Agropalma, Junho/Julho 2013, there are 192 small family farmers of which 97 are involved in agricultural activities such as Cassava, Rice, Asai, Bananas, Pig production, Pepper, Mandioca, etc. (i.e. Benedita Almeida Nascimento, Project 1, Lote 25).</p> <p>IBD Comments: Applicable and easy to check.</p>	

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>Responsibility Program made by Conservation Internacional and Peabiru Institute ate April, 2008; Evaluation Report of Social and Environmental Impacts related of new plantings at new farms made in 2009 and 2010 at Tailândia and Tomé Açú cities, by Orbis Exceller;</p> <p>Interviewed persons: Ana Paula (Social and environmental corporative analyst).</p>			
<p>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.</p>	<p>2.2.4 See above. It is noted that Agropalma have held land titles for over 20 years. The resolution process is well advanced.</p> <p>2.2.5 The disputed areas are all mapped: Laventamiento Planiaametricos Caadastral 1st November 2013. Alos Landsaat Picture 22362/2004 Zone 22S.</p> <p>6.3.1 Documents verified: Register of the meeting realized with local stakeholders at 03th, February, 2011 with aim to show the procedures related with complaints and grievances; Interviewed persons: Cristiane Paiva (Communication Sector).</p> <p>6.3.2 Documents verified: Follow up register file related with a strike warning of tractor operators because of wages paid, with success concluded process; Interviewed persons: Cristiane Paiva (Communication Sector).</p>	<ul style="list-style-type: none"> • The mutually agreed and documented system for dealing with complaints and grievances shall be accessible to all affected parties. • The system shall be designed to resolve disputes to the mutual satisfaction of the affected parties. • The system shall include the options of: <ul style="list-style-type: none"> ○ access to independent legal and technical advice ○ support from representatives of local communities' own choosing, and ○ third party mediation. • Evidence that where conflicts have arisen the conflict resolution mechanism is being used and is considered mutually satisfactory including by affected parties. 	<p>The mutually agreed and documented system for dealing with complaints and grievances was accessible to all affected parties as indicated in Register of the meeting realized with local small stakeholders on 03-02-2011.</p> <p>Register of the meeting realized with local stakeholders at 03th, February, 2011 with aim to show the procedures related with complaints and grievances. Approved procedure as indicated in Procedimiento de Recebimento, Tratamento, Resposta, Negociacao e Solucao de Queixas e Reclamacoes, 03-02-2013. The document lacks a clear indication of access to independent legal and technical advice.</p> <p>There is a registered case of Land dispute presented by a third party managed by Mr. Antonio Pereira Da Silva.</p> <p>Disputed areas: 1.Lote 21, 46, 47 and 48; area 6, Protocolo 2032/75, AGROPALMA for 500 ha. 2.Fazenda 3 Estrellas, for 1089 ha Reinicatoria No. proceso 000421-04.2014.8.14.0076. 3.Agropalma, for 625 ha, Proceso No. 906/57. 4.Casa Natal (Fazenda Trevo), for 3237.3 ha, Proceso 6856/1974.</p>	<p>Partial The existing document must be adjusted to POIG indicators in the way to offer : access to independent legal and technical advice.</p>

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
			<p>Supporting documents:</p> <ol style="list-style-type: none"> 1. Notificación by Galvao Marinheiro, Flavio Galvao, 11-11-2013 (Lawyer firm representing Mrs. Da Silva dispute). 2. Levantamiento Planiamétricos Caadastral, 01-10-2013 (Affected areas map). 3. Confidential Technical Note of Judicial Process, Cases 1 to 4 (Agropalma Lawyer Internal Analysis of Dispute). 4. Instituto de Terras Do Pará, Solicita Legitras Do Pará, Proceso 6856/1979. Herdeiros de Antonio Goncalves Da Silva, DJA 1665 (State Oficial Analysis of previous owner land register). 5. Medida Cautelar de Producao Antecipado de Prova 000 5501-80, 2013.8.14.0076 and Protocolo 2013.03852872-14; 18-02-2013 (Agropalma Court Plea upon land dispute presentation by lawyers representing Mrs. Da Silva). 6. Plotage Dos Titulos Definitivos de Propriedade Da Agropalma, S.A. Municipios de Acará, Tailandia, Roju e Tome-Acu-Para, Junho, 2014, Agrimensor CREA-PA-45TA (Official Register Certificate of Land Tenue of Agropalma). 7. Landsaat Picture 22362/2004, Zone 22 S, of affected or disputed planted areas. 8. Titulo Definitivo 1143, Talonario 65, Livro 1, Registro 11453, Caadastro 5490 C06/77 a 81 (4) (Official evidence of land tenure of Agropalma planted area). 9. Agropalma's Communication of Land Dispute date 21-03-2014: Email to Mr. Darrel Webber, RSPO 26-03-2014 (Responded on 26-03-2014); and IBD on 27-03-2013 by Mr. Marcelo Brito. <p>Notes:</p> <ol style="list-style-type: none"> 1. The land dispute resolution is pending a technical expert review, as indicated in Judicial Instruction given by Mr. Wilson De Souza Correa, District Judge, 01-07-2014. 	

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			<p>2. Title possession documents show that all disputed plots belonged, according to government valid documents, to Agropalma, S.A.</p> <p>3. Dispute presented after more than 20 years of continuous planting, and initiation of land re-planting cycle.</p> <p>IBD Comments: Applicable and easy to check.</p>	
<p>2.4 Social Conditions: 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>6.1.1 Documents verified: Risks Maps related with the communities/local stakeholders; Diagnostic and elaboration of Agropalma's social and environmental projects aim to implement a Social Responsibility Program made by Conservation Internacional and Peabiru Institute ate April, 2008; Evaluation Report of Social and Environmental Impacts related of new plantings at new farms made in 2009 and 2010 at Tailândia and Tomé Açú cities, by Orbis Exceller;</p> <p>Interviewed persons: Ana Paula (Social and environmental corporative analyst).</p> <p>6.1.2 Documents verified: Diagnostic and elaboration of Agropalma's social and environmental projects aim to implement a Social Responsibility Program made by Conservation Internacional and Peabiru Institute on April, 2008. Describes participation of communities; Evaluation Report of Social and Environmental Impacts related of new plantings at new farms made in 2009 and 2010 at Tailândia and Tomé Açú cities, by Orbis Exceller;</p> <p>Interviewed persons: Ana Paula (Social and environmental corporative analyst).</p> <p>6.1.3 Documents verified: Diagnostic and</p>	<ul style="list-style-type: none"> • Social impact assessments and plans for the avoidance or mitigation of impacts shall incorporate the issues of potential human rights violations, social conflicts and land grabbing. • Social impact assessments and plans for the avoidance or mitigation of impacts shall address key equity issues, including housing, healthcare, education, and empowerment of women. 	<p>Diagnostic and elaboration of Agropalma's social and environmental projects aim to implement a Social Responsibility Program made by Conservation Internacional and Peabiru Institute ate April, 2008; and Evaluation Report of Social and Environmental Impacts related of new plantings at new farms made in 2009 and 2010 at Tailândia and Tomé Açú cities, by Orbis Exceller.</p> <p>Grupo Agropalma, S.A. operation is based on equity of human rights without distinction to genre or human condition.</p> <p>Housing and access to medical care are defined according to workers functions.</p> <p>Education access is provided to all children from working personnel at the Company School.</p> <p>Union Femenina de Agropalma (UFA) provides the base for women empowerment in activities directly related to company operations (i.e. CoopUFA providing uniforms for AGROPALMA).</p> <p>There is not a monitoring plan or procedure but a set of tools to monitor stakeholders, employees or third party interested bodies issues, complaints or grievances (i.e. Procedimento de Comunicação Interna e Externa" NPG 34, Ver. 12). This was</p>	<p>Partial</p> <p>The mentioned set of tools can be considered as a plan and the requirements are covered. However a formal plan is not available.</p>

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>elaboration of Agropalma's social and environmental projects aim to implement a Social Responsibility Program made by Conservation Internacional and Peabiru Institute on April, 2008. Describes participation of communities; Evaluation Report of Social and Environmental Impacts related of new plantings at new farms made in 2009 and 2010 at Tailândia and Tomé Açú cities, by Orbis Exceller;</p> <p>Interviewed persons: Ana Paula (Social and environmental corporative analyst).</p> <p>6.1.4 Documents verified: Social Project Management reviewed on July, 2014 that establish the continual of the Social Programs; Interviewed persons: Túlio Dias (Social and environmental Manager); Ana Paula (Social and environmental corporative analyst).</p> <p>6.1.5 Documents verified: Smallholders are not involved with this operation at this time; Interviewed persons: Ana Paula (Social and environmental corporative analyst).</p> <p>6.13.1 Documents verified: Agropalma's Integrated Political Management; Conduct Code of Agropalma members;</p> <p>Interviewed persons: Túlio Dias (Social and environmental Manager); Department VI Rural Works: Edinei Pereira, Nilson Cardoso, Gerson Martin, Celso Gonçalves, Edivaldo Correia, Manoel Domingos, Nazareno Pereira, Carlos Costa Santos; Benedito Teixeira (Department VI Technical Nurse).</p> <p>8.1.1 The company has an action plam covering the 6 topics as required. It includes and evaluation and conclusion.</p>		<p>verified through visits to local communities (i.e. to Claudimar Borges Trindade (Presidente) and Lucila Silva (Responsable Patrimonio) of Associacao Dos Moradores Do Distrito De Palmares (AMD), Tailandia), and personal interviews to workers (i.e. Lana Cristina De Souza Trindade and Ms. Lucilene, Santana). No issues arose during the realization of these activities in regard to compliance criteria.</p> <p>IBD Comments: Applicable and easy to check.</p>	

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	<p>With regard to use of pesticides, this is considered in terms of the active ingredient as well as the quantity. Cmppt VI is organic organic.</p> <p>Since 2012 to date, full mechanisation has been implemented for herbicide use. Reduction in labour to 19 from a peak of over 100. The amount of active ingredient has increased but is limited too Glyphosate only. Two bands are sprayed. In 2012, 0.91 litres of glyphosate per ha. This has increased to 1.8 l/ha in 2014. The spraying is now more accurate and better controlled than before.</p> <p>Biodiversity protection. 2 ways: Protection program. In 2012 there were 19 occurrences of hunting and better conditions were given to the forest wardens. In 2013, the number of hunting incidents was 16. A new house was built and 2 were renewed. This makes the policing of the forest reserve more efficient.</p> <p>Fauna monitoring is made by Conservation International. In 2012 this monitoring was started and completed in 2013. The last monitoring the number of species identified in the reserves has increased. The palm plantations are now included in the monitoring. 449 species of bird. 52 species of medium to large mammals. 57 species of reptiles and 46 species of amphibians. 12 species are considered ERT.</p> <p>Waste reduction. POME treatment is to be improved. 2012 Malaysian companies were visited with a consultant company to look at bio-reactors. This company is now retained to advice on development for Agropalma. Methane capture from lagoons is now being developed and</p>			

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>considered for all POMs. Visits to other companies in South America are being conducted. A new mill is being built with the potential for taking POME from another mill for methane capture.</p> <p>In 2012 the company closed the old system for domestic waste and it is now delivered to specialist company. In 2013 a licence was obtained for a new garbage collection point was built in 2014. Recycling is carried out as much as possible. Dangerous residue is stored in a warehouse and then incinerated.</p> <p>GHG emissions. RSPO model is now used. See 5.6 for more details.</p> <p>Social impacts. In 2007 and 2008, a SEIA was conducted and 2 projects were implemented. Also Agropalma Women's Association was created in 2013 this was legalised.</p> <p>Optimising the supply base. This started in 2013 with the identification of better genetic material and the mechanisation of activities due to a lack of a work force. Target of an average of 23.5 mt FFB/ha in 2013 – this was achieved. Target of 26 mt average over the period 204 to 2017. A sustainability report will be published in 2014.</p>			
<p>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.</p>	<p>2.1.1 Clinic Facility at Agropalma Extractora Complex: 1. Licença de Operação, LO No. 6650/2012, valid until 23-10-2016, Companhia Refinadora Da Amazonia-Filial- AGROPALMA, Tipologia 1702-1. 2. Certificado de Regularidade de Inscrição de Pessoa Jurídica, CRM 0001276-PA (Certificate of Inscripción of the Company).</p>	<ul style="list-style-type: none"> A decent living wage shall be provided to workers, i.e. one that is sufficient to cover all of their basic needs. A comprehensive audit using the criteria in the SA8000 standard and involving worker representatives shall be conducted to assess and 	<p>All interviewed personnel holds a labor contract, work register file, Healthy Occupational Certificate and confirmation of payment of insurance, wage, production payment, FGTS, INSS, and Syndicate. Verified documents corresponded to June/2014 for Carlos Santos, Edney Dourão, Gerson Martins, Edivaldo Costa, Eliel Dias, Benedito Silva, Eliezer Ferreira, Marcos Antônio Souza, and Gerson Duarte.</p>	<p>Partial</p> <p>Although enterprise has no SA8000 it has Ecosocial which incorporates several</p>

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>There was an NC relating to an oil gas station. The company checked that there were no underground leaks and this NC was closed. Subsequently the gas station is being closed and replaced. They are in compliance with the law.</p> <p>Environmental legislation is being complied with, as evidenced in the field.</p> <p>The system of compliance is verified by way of a comprehensive software system that includes all applicable laws. There is a reputable company for support of the software used to keep up to date with the laws.</p> <p>There are several buses used in for workers transportation.</p> <p>A proper sample of buses belonging to Trans Curumin, Trans Maju and Translider Ltd. were fully inspected:</p> <p>Buses: JTO 5999, OBT 9573, JTO 5399, OTC 5456, CLU 1126, and JVE 2493 (Certificado de Registro e Licenciamento de Veiculo No. 00162760/00003). The buses were in full working order regarding, lights, indicators, toilets, fire extinguishers and tyres.</p> <p>Other buses were inspected at visited sites for toilets and all found to be in order with paper and running water.</p> <p>Bus driver licences were verified: Francisco Rodrigues De Sousa, Valid until 16-01-2016, Certificado Curso de Condutores de Veiculos de Transporte Coletivo de Passageiros.</p>	<p>demonstrate compliance with international human rights norms and national labour laws on child labour, forced and compulsory labour, health and safety, freedom of association and right to collective bargaining, discrimination, disciplinary practices, working hours, and remuneration.</p> <ul style="list-style-type: none"> • A public action plan shall be developed that describes operational policies and actions consequent to the findings of the SA8000, and that references the grower’s relevant operational procedures • There shall be no charging of recruitment fees to job-seekers by the company or by private recruitment or employment agents or brokers • Per 6.12.3, where temporary or migrant labourers are employed, the special labour policy and procedures shall include: <ul style="list-style-type: none"> - Specific mechanisms to ensure the implementation of all ILO core convention requirements - A system for humane repatriation and an option to return upon giving birth for female migrant workers prohibited from giving birth in the receiving country - Due protection for any foreign worker found without legal 	<p>“Acordo Coletivo” contract made with rural works syndicate that establish the rights and dues; Conduct Code of Agropalma and Agropalma’s Integrated Political Management that establish attend Brazilian law; Procedure related with Alo Agropalm Program “Procedimento de Comunicação Interna e Externa” NPG 34, Ver. 12, that establish the procedures to communicate with internal and external communities.</p> <p>Contract signed by Agropalma and SENAR on 01/06/13, establishes contract rules for young people between 16 and 24 years. It specifies on its 2o Clause that Agropalma will respect Brazilian Labor Law.</p> <p>Contract signed on 01/06/13 between Agropalma, CIEE and responsible legal for Clerbert Cardoso (16 year old) to work for 4 hours/day in an administrative activity at Agropalma.</p> <p>No evidence at the time of the verification of a comprehensive audit using the criteria in the SA8000.</p> <p>No evidence of a public action plan describing operational policies and actions consequente to the findings of the SA8000 internal audit at the time of the presente verification.</p> <p>No evidence of charging of recruitment fees as indicated in Conduct Code of Agropalma, and personal interviews to Raimundo Silva Da Oliveira, Francisco Clever De Lima, and Elias Avelino de Souza.</p>	<p>parameters of SA8000 and also has OHSAS18001 which incorporates national labor law specifications focussing health and safety. Although no risk assessment exists, the enterprise monitors to employment criteria each harvest coming from small farmer. So, according to IBD compliance is partial but satisfactory.</p> <p>A public action plan is here not applicable since company has no SA8000 auditing.</p>

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>Tractors and heavy equipment operational condition and maintenance was also verified: Tractors 334, 622, 670, 618, 620; Trucks: 130, and JTO 5440 (Fire Truck).</p> <p>Agropalma Mill: 3 kind of licences relating to the unit.</p> <p>1.Licenca de Operacao, LO No. 6650/2012, valid until 23-10-2016, Companhia Refinadora Da Amazonia-Filial- AGROPALMA, Tipologia 1702-1. The activity No 1702-1 covers the activities of the company. Licence permits them to produce 170mt CPO and 57 mt of PKO per day.</p> <p>One condition is to inform the Ministry as to the destination of products.</p> <ul style="list-style-type: none"> • Licence from the fire station to operate. Serie AC No 000954 valid to December 2014. • Licence from the local Mayor to work. Valid to 31/12/2014. <p>Residual oil waste and lab waste: Licence of the operator which can dispose of the waste (i.e. Coleta, Transporte, Tratamento (Incineracao) e Destinacao Final de Residuos Industrias e Hospitalares, Licenca de Operacao 3317/2009, SEMA/PA).</p> <p>Port licence. 2734/2011 valid to 22/11/2015. Activity 0431-1. Activities related to the port.</p> <p>FARM OPERATIONAL LICENCES/CAADASTRAL LAW: 1.Licenca de Actividade Rural, LARN No. 1946/2012 0110-1, Cultura de Ciclo Largo, valid until 15-01-2017 for AGROPALMA, CRAI, AGRIPAR, AGROPALMA, TREVO, GALILEIA, PARAISO DO NORTE, and Cadastro Ambiental Rural, CAR/PA No. 62483.</p>	<p>documents</p> <ul style="list-style-type: none"> • A mechanism shall be in place to identify, prevent, mitigate and address any violations to the human rights of workers. <p>Growers and millers conduct a risk assessment of its FFB supply chain to identify and manage forced labour, trafficking, slavery, and child labour risks.</p>	<p>No migrant or temporary labourers at this company.</p> <p>No evidence of any violations to the human rights of workers as indicated in the Conduct Code of Agropalma, and personal interviews conducted.</p> <p>No evidence of a formal risk assessment of its FFB supply forced labour, trafficking, slavery, and child labour risks at the time of the presente verification. However, the company has implemented a system for constant evaluation by its technical supervisors vsiting small growers farms (i.e. Relatorio de Mano de Obra, Ana Caroline Neris, 02-07-2014). For detected cases produced FFB for evaluated harvesting cycle are not accepted. Next harvesting cycle will be supervised to verify compliance with applicable law and compliance criteria for this point.</p> <p>IBD Comments: Applicable and easy to check.</p>	

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>2. Licença de Actividade Rural, LARN No. 1958/2012, Cultura de Ciclo Largo, valid until 29-01-2017 for COSTAINHEIRA AND SEMPRE VERDE, and Cadastro Ambiental Rural, NCAR/PA No. 62513.</p> <p>2.1.2 The system is understood and implemented by the relevant company managers. Rule NP 39. States how the work must flow and how the system works. There are files with laws and regulations covering:</p> <ul style="list-style-type: none"> • The environment – 407. • Health and Safety and Labour Laws - 356. <p>Quality and Food Safety – 43.</p> <p>2.1.3 The regulations are passed on the necessary departments for implementation. There is software (LEGNET) used to update and monitor and to implement new laws and changes in the law and to ensure compliance. Field inspections ensure compliance and the software is used to keep a check of the implementation.</p> <p>2.1.4 They hire an office of solicitors and technicians that review all laws. CTSGI. The set of laws are proposed then update the company with any potentially applicable laws and regulations. The law / legal requirement is reviewed by the company solicitors and then implemented as necessary. New laws and regulations are frequent and need to be carefully monitored.</p> <p>6.5.1 Documents verified: Labor contract, Work register file, Healthy Occupational Certificate and confirmation of payment of insurance, wage, production payment, FGTS, INSS, Syndicate on June/2014 to Carlos Santos, Edney Dourão, Gerson Martins, Edivaldo Costa, Eliel Dias, Benedito Silva,</p>			

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>Eliezer Ferreira, Marcos Antônio Souza, Gerson Duarte.</p> <p>6.5.2 Documents verified: “Acordo Coletivo” contract made with rural works syndicate that establish the rights and dues;</p> <p>Interviewed persons: Túlio Dias (Social and environmental Manager); Department VI Rural Works: Edinei Pereira, Nilson Cardoso, Gerson Martin, Celso Gonçalves, Edivaldo Correia, Manoel Domingos, Nazareno Pereira, Carlos Costa Santos;</p> <p>Support document: Acordo Coletivo de Trabalho 2013/2014, Número Da Solicitacao MR018181/2014.</p> <p>6.5.3 Documents verified: Visited at 30th July the Shelters; Ambulatory; Two potable water supplies; and Restaurant service located at AGROPALMA Mill.</p> <p>Interviewed persons: Túlio Dias (Social and environmental Manager); Department VI Rural Works: Edinei Pereira, Nilson Cardoso, Gerson Martin, Celso Gonçalves, Edivaldo Correia, Manoel Domingos, Nazareno Pereira, Carlos Costa Santos;</p> <p>Agropalma Clinic is effectively a small hospital and full access is given to all workers and their families. It is an extremely professional organisation run by a qualified doctor. Dr Maria Antonieta Espindola Dacosta. Lab for blood analysis. General clinic. Orthopaedics. Vaccines etc. Laboratory. Bio-medic. Main diseases: Field workers: Thorns in dry season. Cuts and snakes in the wet season.</p>			

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>Industry workers. Fall over and cut themselves. Burns.</p> <p>Office workers: Back pain, viruses, flu asthma.</p> <p>Malaria is present. Dengue in the rainy season.</p> <p>Leishmaniose – 3 or 4 cases per year.</p> <p>Obstetrics from an external source. They state the procedure to be followed by the company if any pregnant lady falls ill.</p> <p>6.5.4 Documents verified: Visited at 30th July the Restaurant located at AGROPALMA Mill and use by employees; Monitoring system of quality food; Reduce cost for employees;</p> <p>Interviewed persons: Túlio Dias (Social and environmental Manager); Department VI Rural Works: Edinei Pereira, Nilson Cardoso, Gerson Martin, Celso Gonçalves, Edivaldo Correia, Manoel Domingos, Nazareno Pereira, Carlos Costa Santos.</p> <p>6.6.1 Freedom of Association: Contact Person Tulio Dias, Social and Environmental Manager.</p> <p>Support Documents verified:</p> <p>Visit on 30th July to the Restaurant located at AGROPALMA Mill and use by employees; Monitoring system of quality food; Reduce cost for employees;</p> <p>Acordo Coletivo de Trabalho 2013/2014, Número Da Solicitudao MR018181/2014.</p> <p>Agropalma’s conduct code that establish the respect with the law; “Acordo Coletivo” contract made with rural works syndicate that establish the rights and dues;</p>			

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>Interviewed persons: Túlio Dias (Social and environmental Manager); Department VI Rural Works: Edinei Pereira, Nilson Cardoso, Gerson Martin, Celso Gonçalves, Edivaldo Correia, Manoel Domingos, Nazareno Pereira, Carlos Costa Santos;</p> <p>6.6.2 Documents verified: Meeting's with syndicates, Works and Agropalma to define the contract with workers are not organized by Agropalma and the register are filed at respective syndicates;</p> <p>Interviewed persons: Ana Paula (Social and environmental corporative analyst);</p> <p>Meeting with union representative: As detailed in ATA DE REUNIAO No. 002, 30-04-2014, and ATA DE REUNIAO NEGACIACAO SINDICAL AGRICOLA, ATA, 001; 14-02-2014.</p> <p>6.7.1 Conduct Code of Agropalma and Agropalma's Integrated Political Management that establish attend Brazilian law; Contract signed by Agropalma and Senar signed on 01/06/13 related about contraction of young people between 16 and 24 years and establish at 2o Clause that Agropalma will respect Brazilian Labor Law; Contract signed on 01/06/13 between Agropalma, CIEE and responsible legal for Ierbert Cardoso (16 year old) to work for 4 hours/day in an administrative activity at Agropalma, and establish at 1o Clause that Agropalma will respect Brazilian Labor Law;</p> <p>Interviewed persons: Túlio Dias (Social and environmental Manager); Department VI Rural Works: Edinei Pereira, Nilson Cardoso, Gerson Martin, Celso Gonçalves, Edivaldo Correia, Manoel Domingos, Nazareno Pereira, Carlos Costa Santos; Rogério Moraes (Law Relations Coordinator); Diego</p>			

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>Rocha (RH Technical Assistance).</p> <p>Contact Person: Tulio Dias, Social and Environmental Manager. Support document: Manual de Conducta dos Colaboradores do Grupo Agropalma, 08/2008, Clausula 7.37.</p> <p>6.8.1 Documents verified: Conduct Code of Agropalma; Agropalma's Integrated Political Management;</p> <p>Activities Routine No RA29GRHU 009, Rev. 09/05/13, Page 26 a 32, iten 6.29; Case I - Social Attendance for sexual and moral harassment (Process start on 15/11/13, process ending on 09/12/13; Case II – (Process start on 12/07/13 and ending 16/07/13);</p> <p>Contact Person: Tulio Dias, Social and Environmental Manager. Support document: Acordo Coletivo de Trabalho 2013/2014, Número Da Solicitud MR018181/2014, Clausula Vigésima Quinta-Estabilidade Provisoria.</p> <p>Interviewed persons: Túlio Dias (Social and environmental Manager); Oto Barbosa (General Administrative Manager) and Itaneide Fernandes (Social Coordinator); Sinimbu (General Agriculture Manager).</p> <p>6.8.2 Documents verified: Follow up register file with all internal communications claim process; Agropalma's Integrated Political Management; Alo Agropalma Program with community; Activities Routine No RA29GRHU 009, Rev. 09/05/13, Page 26 a 32, iten 6.29; Case I - Social Attendance for sexual and moral harassment (Process start on 15/11/13, process ending on 09/12/13; Case II – (Process start</p>			

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>on 12/07/13 and ending 16/07/13);</p> <p>Interviewed persons: Túlio Dias (Social and environmental Manager); Department VI Rural Works: Edinei Pereira, Nilson Cardoso, Gerson Martin, Celso Gonçalves, Edivaldo Correia, Manoel Domingos, Nazareno Pereira, Carlos Costa Santos; Benedito Teixeira (Department VI Technical Nurse); Cristiane Paiva (Communication Sector).</p> <p>6.8.3 Documents verified: Conduct Code of Agropalma; ASO (Ocupacional Healthy Certificate) of Carlos Santos, Edney Dourão, Gerson Martins; Job Title definition for Herbicide Application Operator, Laboratory Auxiliary and Boiler Operator that establish the attributions, characteristics, Environmental Risks aspects; Internal communicate No GRH, Rev. 04 (Hiring employees general procedures), Items 2.2.3 and 2.3;</p> <p>Interviewed persons: Ana Paula (Social and environmental corporative analyst).</p> <p>6.9.1 Conduct Code of Agropalma; Agropalma's Integrated Political Management; Activities Routine No RA29GRHU 009, Rev. 09/05/13, Page 26 a 32, item 6.29; Case I - Social Attendance for sexual and moral harassment (Process start on 15/11/13, process ending on 09/12/13; Case II – (Process start on 12/07/13 and ending 16/07/13;</p> <p>Interviewed persons: Ana Paula (Social and environmental corporative analyst); Oto Barbosa (General Administrative Manager); Itaneide Fernandes (Social Coordinator); Sinimbu (General Agriculture Manager).</p> <p>6.9.2 Documents verified: Agropalma's Integrated</p>			

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>Political Management; Agropalma’s Conduct Code of; Activities Routine No. RA29GRHU 009, Rev. 09/05/13, Page 26 a 32, item 6.29; Case I - Social Attendance for sexual and moral harassment (Process start on 15/11/13, process ending on 09/12/13, Case II – (Process start on 12/07/13 and ending 16/07/13);</p> <p>Interviewed persons: Ana Paula (Social and environmental corporative analyst); Oto Barbosa (General Administrative Manager); Itaneide Fernandes (Social Coordinator); Sinimbu (General Agriculture Manager).</p> <p>6.9.3 Documents verified: Procedure related with Alo Agropalm Program “Procedimento de Comunicação Interna e Externa” NPG 34, Ver. 12, that establish the procedures to communicate with internal and external communities; Activities Routine No RA29GRHU 009, Rev. 09/05/13, Page 26 a 32, item 6.29; Case I - Social Attendance for sexual and moral harassment (Process start on 15/11/13, process ending on 09/12/13,; Case II – (Process start on 12/07/13 and ending 16/07/13);</p> <p>Interviewed persons: Cristiane Paiva (Communication Assistance – Corporate Communicative); Sinimbu (General Agriculture Manager); Oto Barbosa (General Administrative Manager); Itaneide Fernandes (Social Coordinator).</p> <p>6.12.1 Documents verified: Conduct Code of Agropalma; Agropalma’s Integrated Political Management;</p> <p>Interviewed persons: Túlio Dias (Social and environmental Manager); Department VI Rural Works: Edinei Pereira, Nilson Cardoso, Gerson Martin, Celso Gonçalves, Edivaldo Correia, Manoel</p>			

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>Domingos, Nazareno Pereira, Carlos Costa Santos.</p> <p>6.12.2 Documents verified: Conduct Code of Agropalma; Agropalma's Integrated Political Management; Interviewed persons: Ana Paula (Social and environmental corporative analyst).</p> <p>6.12.3 Documents verified: : Conduct Code of Agropalma; Agropalma's Integrated Political Management; Interviewed persons: Ana Paula (Social and environmental corporative analyst).</p> <p>6.13.1 Documents verified: Agropalma's Integrated Political Management; Conduct Code of Agropalma members; Interviewed persons: Túlio Dias (Social and environmental Manager); Department VI Rural Works: Edinei Pereira, Nilson Cardoso, Gerson Martin, Celso Gonçalves, Edivaldo Correia, Manoel Domingos, Nazareno Pereira, Carlos Costa Santos; Benedito Teixeira (Department VI Technical Nurse).</p>			
<p>2.6 Support Palm Oil Smallholders: Contracts with smallholders are based on a fair, transparent and accountable partnership. Small holders 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</p>	<p>6.10.1 Interviewed small holders were: Benedita Almeida Nascimento, Project 1, Lote 25, and Mr. Jorge, Small Holder Tecnincal Assistant.</p> <p>6.10.2 Interviewed small holders were: Benedita Almeida Nascimento, Project 1, Lote 25, and Mr. Jorge, Small Holder Tecnincal Assistant.</p> <p>Bus Transportation. Input services include the bus operators.</p> <p>6.10.3 Interview Solagne Silva and Antonia Vilani Silva. Assisitant technician for transport</p>	<ul style="list-style-type: none"> • A smallholder support programme shall be documented and monitored, which includes: <ul style="list-style-type: none"> ○ Measures to increase the productivity of smallholders to a comparable benchmark of productivity for the region, and a target of reaching the same productivity level as company estates. ○ Support relating to financial management and budgeting. ○ Support relating to logistics, FFB 	<p>There is not a written program for smallholder support.</p> <p>Technical assistance to increase productivity based on Agropalma's know how to small growers, is done on weekly basis by trained personnel (i.e. Antonio Jorge Brandao Correa, Tecnico Agricola visiting Benedita Almeida Do Nascimento, a small grower). Productivity increases are recognized through a price incentive per ton of FFB produce of approximately 8% of current FFB price.</p>	<p>Partial</p> <p>By time of audit GRI report was not published. Now it is and incorporat es specific chapter.</p>

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
<p>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>infrastructure.</p> <p>Contract for the personnel transport of company MOJU Ltd. Dated 2nf November 2007 and still valid. Security: Prosegur Brasil S/A, 19-10-2009; personnel transportation Translider Ltd., 02-05-2006; Industrial Maintenance: No. 282/14, 21-07 a 21-09-2014, JL e Silva Servicio Industrial, and TJ De Soto Industrial, No. 293-14; 21-07 a 21-09-2014. The contracts include annex 1 listing all the obligations detailing security, labour, health and environment and protection equipment. The contracts include annex 1 listing all the obligations detailing security, labour, health and environment and protection equipment.</p> <p>The payment control of the contract with updated values (i.e. Protocolo de Recebimento de Aditivo de Contrato; Contrato de Exclusividade de Fornecimiento de Frutos de Dendé, Assosciacao Do Desenvolvimento Comunitario Do Ramal Araui, 01-12-2009; Contrato de Exclusividade de Fornecimiento de Frutos de Dendé, Assosciacao Do Desenvolvimento Comunitario Do Ramal Araui, 27-02-2002, and Contrato de Exclusividade de Fornecimiento de Frutos de Dendé, José Raupp Da Rosa, 15-08-2004).</p> <p>Interviewed small holders were: Benedita Almeida Nascimento, Project 1, Lote 25, and Mr. Jorge, Small Holder Tecnincal Assistant.</p> <p>Weekly checking of the buses to see all security and functioning items.</p> <p>6.10.4 Payment details for the contract in 6.10.3 was checked and found to be timely.</p> <p>Interviewed small holders were: Benedita Almeida Nascimento, Project 1, Lote 25, and Mr. Jorge, Small</p>	<p>processing and improved market access.</p> <ul style="list-style-type: none"> Progress in implementation of the smallholder support programme shall be included in public reporting. 	<p>Progress in implementation of the smallholder support programme was not published at the time of the presente verification. However, the corresponding document (i.e. Agropalma Sustainability Report 2013) was under review.</p> <p>Support to financial management and budgeting training was provided by Instituto Peabiru. This initiative was rejected by a General Asambly of the Assocacao Arauai, 13-06-2013).</p> <p>Support relating to logistcs is provided by advising on proper transportation of FFB, road repairing and maintenance.</p> <p>IBD Comments: Applicable and easy to check.</p>	

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>Holder Tecnical Assistant.</p> <p>6.11.1 Documents verified: Diagnostic and elaboration of Agropalma's social and environmental projects aim to implement a Social Responsibility Program made by Conservation Internacional and Peabiru Institute on April, 2008. Describes participation of communities;</p> <p>Interviewed persons: Túlio Dias (Social and environmental Manager); Ana Paula (Social and environmental corporative analyst).</p> <p>6.11.2 No scheme smallholders for this mill. Interviewed persons: Túlio Dias (Social and environmental Manager).</p>			
3. Corporate and Product Integrity				
<p>3.1 Transparency and Corruption: Producer companies shall publicize 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.</p>	<p>1.1.1 Requests can be made and a date arranged to visit the office.</p> <p>There is a written procedure. There are forms at the gates that can be completed by any person. The communication department registers the requests and this is sent to the particular department. Within 3 weeks the answer is provided.</p> <p>Palmares Village is the main village that requests information.</p> <p>The company web site provides guidance for how to obtain information in both English and Portuguese.</p> <p>Hiring and positions vacant are advertised. An email address is available for information and the procedures for hiring are with the Recruitment and Selection department.</p> <p>There is an internal newspaper and information papers that are sent to all workers. There is a procedure to inform any workers that cannot read. The main issues are explained.</p> <p>There is a log of all communications.</p> <p>From the Agroplama website: "The principle of</p>	<ul style="list-style-type: none"> • The ethical policy prohibiting all forms of corruption shall be publicly available. • The ethical policy shall include: <ul style="list-style-type: none"> ○ A respect for fair conduct of business; ○ A prohibition of all forms of corruption, bribery and fraudulent use of funds and resources; ○ A proper disclosure of information in accordance with applicable regulations and accepted industry practices. • The ethical policy shall include a commitment to support efforts to establish anti-corruption legislation, and to comply with existing anti-corruption legislation. 	<p>A specialist lawyer has prepared a paper specific prohibiting all forms of corruption which senior management has signed. There is a policy statement on the web site regarding business operations with ethics and integrity. There is reference to Anti-Corruption Act Law No 12.846/2013.</p> <p>Website: Policies include: "Conduct its business operations with ethics and integrity, in accordance with Agropalma Group Conduct Code (items 1, 2 and 3). In addition, Company commits to manage its business and operations considering and respecting the entire content of Brazilian Anti-Corruption Act (Law nº 12846/2013)".</p> <p>Proper disclosure of information in accordance with applicable regulations as indicated in document Termino de Ciencia Lei No. 12.846/2013, 06-12-2013.</p> <p>All electronic means are used to communicate to</p>	<p>Partial Lack of indicators and parameters for audit team should be supplied by POIG. This would enable a complete audit regarding last indicator of this item.</p>

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>Transparency encompasses the concept of Socio-environmental Responsibility adopted by the Agropalma Group. In order to reassure its commitment to Transparency, the Agropalma Group publicly discloses all administrative documents, except when protected by commercial confidentiality or in case disclosure may cause harmful environmental or social consequences”.</p> <p>1.1.2 A program called “Allo Agroplama” which also gives full details as to how to contact the company. Example of communication: Date. Number. How the request was made. Who dealt with it etc., e.g. Request for information regarding taxes paid by the company. 01/06/2013. Finalised on the 17th June.</p> <p>AGROPALMA Mill: 11th July 2014. Email from Agropalma in response to email on the 4th July for technical visit. 14th July 2014: Approval for technical visit and supply of technical information.</p> <p>1.2.1 All the documents that are publicly available are listed on the web site. Not all documents are available in hard format as they are expensive to produce. They are available for review, as are all internal documents.</p> <p>From the Agropalma website: “Available documents, among others: Title deed and other land related documents; Occupational Health Medical Control Program, Environment risk prevention programs, PAE, Technical Report of Working Environment Conditions; ECP, ECR, EIS, Probe Diagnostics and other socio-environmental studies; Documents related to reviews of areas of high conservation value; Integrated Management System Manual, Rules of Procedures and Operational Routines; Claim Details Report;</p>	<ul style="list-style-type: none"> Implementation of anti-corruption measures shall be demonstrated in order to ensure compliance with the ethical policy, proportionate to the scale and intensity of management activities and the risk of corruption. 	<p>all levels of the workforce. New workers are informed of policies and there is a dialogue system allowing workers to discuss any policies and procedures.</p> <p>The compliance criteria lack a precise definition of indicators to be evaluated. In spite of that it mentioned that the Company conducts Internal, External and Governmental Audits to identify and to prevent corruption and to ensure integrity (i.e. Financial Report of 2013, 28-02-2014 en Diario Oficial de Estado Do Para).</p> <p>IBD Comments: Applicable and easy to check.</p>	

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>Long term Economic and Financial Sustainability Plan;</p> <p>Negotiation and Land Acquisition Procedures;</p> <p>Continuous Improvement Plan;</p> <p>RSPO certification reports;</p> <p>Respect for Human Rights Policy (still being developed);</p> <p>Current and historical prices paid to FFB suppliers".</p> <p>Comments relating directly to the list of documents in the list in the column on the left:</p> <p>Land Titles/user rights:</p> <p>1a. Contact person: Mr. Antonio Pereira Da Silva, General Affairs Manager,</p> <p>1b.Supporting documents: all land titles/user rights for planted areas available for review. See 2.2.1. below for details.</p> <p>Policies for workers:</p> <p>2a. Contact person: Mr. Tulio Dias, Social and Environmental Manager.</p> <p>2b. Supporting document:</p> <p>2b1. Manual de Conduta dos Colaboradores do Grupo Agropalma, 08/2008.</p> <p>2b2. Worker Negatiation procedures as indicated in current Acordo Coletivo de Trabalho 2014/2015, Número Da Solicitacao MR018181/2014.</p> <p>Integrated System Management:</p> <p>3a. Contact person: Mr. Tulio Dias, Social and Environmental Manager.</p> <p>3b. Supporting document:</p> <p>3b1. Manual Do SIG, No. MSIG; 15-04-2013, Revisao 18 (Integrated System Management Manual).</p> <p>1.3.1 A specialist lawyer has prepared a paper specific to corruption which senior management has signed. There is a policy statement on the web site regarding business operations with ethics and integrity. There is reference to Anti-Corruption Act Law No 12.846/2013. (Copy seen in office).</p> <p>Website: Policies include: "Conduct its business</p>			

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>operations with ethics and integrity, in accordance with Agropalma Group Conduct Code (items 1, 2 and 3). In addition, Company commits to manage its business and operations considering and respecting the entire content of Brazilian Anti-Corruption Act (Law nº 12846/2013)".</p> <p>There are internal audits are conducted to identify and to prevent corruption and to ensure integrity. All electronic means are used to communicate to all levels of the workforce. New workers are informed of policies and there is a dialogue system allowing workers to discuss any policies and procedures.</p> <p>2.1.1 Clinic Facility at Agropalma Extractora Complex:</p> <p>1.Licenca de Operacao, LO No. 6650/2012, valid until 23-10-2016, Companhia Refinadora Da Amazonia-Filial- AGROPALMA, Tipologia 1702-1.</p> <p>2.Certificado de Regularidade de Inscricao de Pessoa Juridica, CRM 0001276-PA (Certificate of Inscrición of the Company).</p> <p>There was an NC relating to an oil gas station. The company checked that there were no underground leaks and this NC was closed. Subsequently the gas station is being closed and replaced. They are in compliance with the law.</p> <p>Environmental legislation is being complied with, as evidenced in the field.</p> <p>The system of compliance is verified by way of a comprehensive software system that includes all applicable laws. There is a reputable company for support of the software used to keep up to date with the laws.</p> <p>There are several buses used in for workers</p>			

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>transportation.</p> <p>A proper sample of buses belonging to Trans Curumin, Trans Maju and Translider Ltd. were fully inspected:</p> <p>Buses: JTO 5999, OBT 9573, JTO 5399, OTC 5456, CLU 1126, and JVE 2493 (Certificado de Registro e Licenciamento de Veiculo No. 00162760/00003). The buses were in full working order regarding lights, indicators, toilets, fire extinguishers and tyres.</p> <p>Other buses were inspected at visited sites for toilets and all found to be in order with paper and running water.</p> <p>Bus driver licences were verified: Francisco Rodrigues De Sousa, Valid until 16-01-2016, Certificado Curso de Condutores de Veiculos de Transporte Coletivo de Passageiros.</p> <p>Tractors and heavy equipment operational condition and maintenance was also verified: Tractors 334, 622, 670, 618, 620; Trucks: 130, and JTO 5440 (Fire Truck).</p> <p>Agropalma Mill: 3 kind of licences relating to the unit.</p> <p>1.Licenca de Operacao, LO No. 6650/2012, valid until 23-10-2016, Companhia Refinadora Da Amazonia-Filial- AGROPALMA, Tipologia 1702-1. The activity No 1702-1 covers the activities of the company. Licence permits them to produce 170mt CPO and 57 mt of PKO per day.</p> <p>One condition is to inform the Ministry as to the destination of products.</p> <ul style="list-style-type: none"> • Licence from the fire station to operate. Serie AC No 000954 valid to December 2014. • Licence from the local Mayor to work. Valid to 31/12/2014. 			


POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>Residual oil waste and lab waste: Licence of the operator which can dispose of the waste (i.e. Coleta, Transporte, Tratamento (Incineracao) e Destinacao Final de Residuos Industrias e Hospitalares, Licenca de Operacao 3317/2009, SEMA/PA).</p> <p>Port licence. 2734/2011 valid to 22/11/2015. Activity 0431-1. Activities related to the port.</p> <p>FARM OPERATIONAL LICENCES/CAADASTRAL LAW: 1.Licenca de Actividade Rural, LARN No. 1946/2012 0110-1, Cultura de Ciclo Largo, valid until 15-01-2017 for AGROPALMA, CRAI, AGRIPAR, AGROPALMA, TREVO, GALILEIA, PARAISO DO NORTE, and Cadastro Ambiental Rural, CAR/PA No. 62483. 2. Licenca de Actividade Rural, LARN No. 1958/2012, Cultura de Ciclo Largo, valid until 29-01-2017 for COSTAINHEIRA AND SEMPRE VERDE, and Cadastro Ambiental Rural, NCAR/PA No. 62513.</p> <p>2.1.2 The system is understood and implemented by the relevant company managers. Rule NP 39. States how the work must flow and how the system works. There are files with laws and regulations covering: <ul style="list-style-type: none"> • The environment – 407. • Health and Safety and Labour Laws - 356. Quality and Food Safety – 43.</p> <p>2.1.3 The regulations are passed on the necessary departments for implementation. There is software (LEGNET) used to update and monitor and to implement new laws and changes in the law and to ensure compliance. Field inspections ensure compliance and the software is used to keep a</p>			

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>check of the implementation.</p> <p>2.1.4 They hire an office of solicitors and technicians that review all laws. CTSGI. The set of laws are proposed then update the company with any potentially applicable laws and regulations. The law / legal requirement is reviewed by the company solicitors and then implemented as necessary.</p> <p>New laws and regulations are frequent and need to be carefully monitored.</p>			
<p>3.2 Traceability: 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>		<ul style="list-style-type: none"> • Within 12 months, all FFB shall be fully traceable to origin either from company estates or third party suppliers. Records shall include: <ul style="list-style-type: none"> ○ Name of supplier directly supplying to mill ○ Location and coordinates of origin(s) • Measures designed to ensure that FFB is not sourced from any illegally occupied land or from any legally protected areas shall be defined and implemented, based on known levels of risk. 	<p>There is a Traceability procedure to ensure that 100% of FFB comes from legally established farms (i.e. CPO e PKO e Materias Primas CFF/NPR GIND 09, 2014).</p> <p>All outsourced FFB comes from known smallholders (i.e. Productores Familiares, Base Janeiro 2014; and Productores Independientes, 20-02-2014), and Cadastro Ambiental Rural CAR/PA No. 106366, titulo 93361/2013, Kazumoto Ito and CAR/PA No. 51927, Titulo No. 3681/2011, Karl Bernard Reich). FFB Tonnes received at weighing scale level are electronically registered based on smallholder name, farm name, FFB number and weight of FFB (i.e. Weightbridge Ticket).</p> <p>FFB coming from smallholders is segregated from Agropalma's own FFB, and produce CPO and PKO are also kept segregated in designated tanks.</p> <p>IBD Comments: Applicable and easy to check.</p>	<p>Full</p>
<p>3.3 Report on Social, Labour and Environmental Performance: Disclose on the company social, labour and environmental</p>	<p>1.2.1 All the documents that are publicly available are listed on the web site. Not all documents are available in hard format as they are expensive to produce. They are available for review, as are all</p>	<ul style="list-style-type: none"> • A publicly available sustainability report shall be prepared at a minimum every two years, covering as a minimum all issues relevant to 	<p>The sustainability report was not published at the time of the presente verification. However, the corresponding document (i.e. Agropalma Sustainability Report 2013, Model GRI 4) was</p>	<p>Fail</p> <p>To date, GRI report</p>

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
<p>performance including the elements of this charter, and how the organization demonstrates good governance of its sustainability system using the guidance of the Global Reporting Initiative or equivalent approach.</p>	<p>internal documents. From the Agropalma website: “Available documents, among others: Title deed and other land related documents; Occupational Health Medical Control Program, Environment risk prevention programs, PAE, Technical Report of Working Environment Conditions; ECP, ECR, EIS, Probe Diagnostics and other socio-environmental studies; Documents related to reviews of areas of high conservation value; Integrated Management System Manual, Rules of Procedures and Operational Routines; Claim Details Report; Long term Economic and Financial Sustainability Plan; Negotiation and Land Acquisition Procedures; Continuous Improvement Plan; RSPO certification reports; Respect for Human Rights Policy (still being developed); Current and historical prices paid to FFB suppliers”. Comments relating directly to the list of documents in the list in the column on the left: Land Titles/user rights: 1a. Contact person: Mr. Antonio Pereira Da Silva, General Affairs Manager, 1b.Supporting documents: all land titles/user rights for planted areas available for review. See 2.2.1. below for details. Policies for workers: 2a. Contact person: Mr. Tulio Dias, Social and Environmental Manager. 2b. Supporting document: 2b1. Manual de Conduta dos Colaboradores do Grupo Agropalma, 08/2008. 2b2. Worker Negotiation procedures as indicated in</p>	<p>compliance with this Charter. This includes relevant RSPO indicators and the additional POIG indicators.</p> <ul style="list-style-type: none"> The public sustainability report shall include details relating to the company’s governance of its sustainability systems, consistent with the GRI Sustainability Reporting Guidelines (or equivalent approach). 	<p>under review. IBD Comments: Applicable and easy to check.</p>	<p>is published and enterprise is compliant.</p>

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>current Acordo Coletivo de Trabalho 2014/2015, Número Da Solicitacao MR018181/2014.</p> <p>Integrated System Management:</p> <p>3a. Contact person: Mr. Tulio Dias, Social and Environmental Manager.</p> <p>3b. Supporting document:</p> <p>3b1. Manual Do SIG, No. MSIG; 15-04-2013, Revisao 18 (Integrated System Management Manual).</p>			
<p>3.4 RSPO Certification and Company Operations:</p> <p>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.</p>		<ul style="list-style-type: none"> • A minimum of 50% of the company's plantations shall be RSPO certified upon commitment to this Charter. • A documented commitment shall be made, and progress monitored, to achieve 100% RSPO certification of the company's plantations within 2 years. • A documented commitment shall be made, and progress monitored, to purchase 100% RSPO certified FFB within 2 years. Acceptable alternatives may be defined for independent smallholders. • Where there are new acquisitions of uncertified plantations, these shall be RSPO certified within 2 years of acquisition. 	<p>All FFB produce from Agropalma is RSPO certified by IBD. FFB production coming from smallholders (i.e. family and independent producers) was evaluated in June, 2014 against RSPO Principles & Criteria. No major non-conformances were detected. Thus, their incorporation as RSPO certified suppliers is under IBD internal approval processes completion.</p> <p>IBD Comments: Applicable and easy to check.</p>	Full
<p>3.5 Responsible Supply Chains:</p> <p>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.</p>	<p>1.2.1 All the documents that are publicly available are listed on the web site. Not all documents are available in hard format as they are expensive to produce. They are available for review, as are all internal documents.</p> <p>From the Agropalma website:</p> <p>"Available documents, among others:</p> <p>Title deed and other land related documents;</p> <p>Occupational Health Medical Control Program,</p> <p>Environment risk prevention programs, PAE,</p> <p>Technical Report of Working Environment Conditions;</p>	<ul style="list-style-type: none"> • Compliance with the requirements of this Charter, including relevant RSPO indicators and the additional POIG indicators, shall be independently verified within 12 months of commitment, and then on an annual basis. • The results of the independent verification shall be publicly reported within 12 months of commitment, and then on an annual basis. 	<p>N/A. This is the first verification external audit to the company.</p> <p>IBD Comments: Applicable and easy to check.</p>	N/A

POIG requirement	Related current RSPO indicators	Proposed additional POIG indicators	Evaluation and documents used	Compliance
	<p>ECP, ECR, EIS, Probe Diagnostics and other socio-environmental studies; Documents related to reviews of areas of high conservation value; Integrated Management System Manual, Rules of Procedures and Operational Routines; Claim Details Report; Long term Economic and Financial Sustainability Plan; Negotiation and Land Acquisition Procedures; Continuous Improvement Plan; RSPO certification reports; Respect for Human Rights Policy (still being developed); Current and historical prices paid to FFB suppliers". Comments relating directly to the list of documents in the list in the column on the left: Land Titles/user rights: 1a. Contact person: Mr. Antonio Pereira Da Silva, General Affairs Manager, 1b.Supporting documents: all land titles/user rights for planted areas available for review. See 2.2.1. below for details. Policies for workers: 2a. Contact person: Mr. Tulio Dias, Social and Environmental Manager. 2b. Supporting document: 2b1. Manual de Conduta dos Colaboradores do Grupo Agropalma, 08/2008. 2b2. Worker Negotiation procedures as indicated in current Acordo Coletivo de Trabalho 2014/2015, Número Da Solicitacao MR018181/2014. Integrated System Management: 3a. Contact person: Mr. Tulio Dias, Social and Environmental Manager. 3b. Supporting document: 3b1. Manual Do SIG, No. MSIG; 15-04-2013, Revisao 18 (Integrated System Management Manual).</p>			

4.1. Signing by the Auditor Team.	
Signed by the lead auditor:	
The undersigned, being the auditors, confirm that this report is an accurate record of the findings and of the closing meeting. I further confirm that the summary of the findings as presented are a true representation of the actual findings of the audit team.	
Name:	Alvaro Garcia
Position:	IBD Auditor
Signature:	
Date:	
Name:	Ronald Vargas
Position:	IBD Auditor
Signature:	
Date:	19-08-2014