

# NEPCon Evaluation of Societe Bioenergies Cote d'Ivoire Sarl Compliance with the SBP Framework: Public Summary Report

Main (Initial) Audit

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## Completed in accordance with the CB Public Summary Report Template Version 1.4

*For further information on the SBP Framework and to view the full set of documentation see  
[www.sbp-cert.org](http://www.sbp-cert.org)*

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# 1 Overview

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Current report completion date:	02/Apr/2020
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Name of the Company:	Societe Bioenergies Cote d'Ivoire Sarl
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Certified Supply Base:	Côte d'Ivoire, rubber wood plantation
SBP Certificate Code:	SBP-07-82
Date of certificate issue:	07/Apr/2020
Date of certificate expiry:	06/Apr/2025

This report relates to the Main (Initial) Audit

## 2 Scope of the evaluation and SBP certificate

Description of the scope: Production of wood chips, for use in energy production. Purchase of roundwood (*Hevea brasiliensis*) and transportation to different harbours in Europe. The scope of the certificate includes Supply Base Evaluation for material from *Hevea brasiliensis* from plantations with 100+ hectares in the Ivory Coast.

### 3 Specific objective

The specific objective of this evaluation was to confirm that the Biomass Producer's management system is capable of ensuring that all requirements of specified SBP Standards are implemented across the entire scope of certification. The scope of this evaluation also covered the Supply Base Evaluation, and the mitigation measures described herein.

The scope of the evaluation covered:

- Review of the BP's management procedures,
- Review of the updated Supply Base Report;
- Review of the presented risk assessment
- Review of proposed mitigation measures
- Consultation with stakeholders
- Review of the energy data;
- Review of FSC system control points, analysis of the existing FSC CoC system;
- Review of the records, calculations and conversion coefficients;
- Interviews with responsible staff;
- Review of the records

## 4 SBP Standards utilised

### 4.1 SBP Standards utilised

Please select all SBP Standards used during this evaluation. All Standards can be accessed and downloaded from <https://sbp-cert.org/documents/standards-documents/standards>

- SBP Framework Standard 1: Feedstock Compliance Standard (Version 1.0, 26 March 2015)
- SBP Framework Standard 2: Verification of SBP-compliant Feedstock (Version 1.0, 26 March 2015)
- SBP Framework Standard 4: Chain of Custody (Version 1.0, 26 March 2015)
- SBP Framework Standard 5: Collection and Communication of Data (Version 1.0, 26 March 2015)

### 4.2 SBP-endorsed Regional Risk Assessment

N/A. The organization has used its own risk assessment produced by an external consultant.

## 5 Description of Company, Supply Base and Forest Management

### 5.1 Description of Company

Societe Bioenergies Côte d'Ivoire Sarl (SBIOCI) was founded in 2019 in Abidjan in Côte d'Ivoire / Ivory Coast as a producer and trader of rubberwood biomass for generators in Europe.

Rubberwood biomass is produced at agro-industrial plantations located in the Southern part of Côte d'Ivoire. The biomass is a by-product (end-of-life) from trees used for latex production. Production takes place in mono-cultures of rubber trees (*Hevea brasiliensis*) in rotations of 30-40 years ending with overturning and replanting of the next generation. The scope only covers agro-industrial plantations with 100+ hectares. Latex is also produced by small scale out-growers, typically with 1 to 15 hectares, these are not part of the scope.

All feedstock is primary and can be traced back to the specific area in the plantation where it originates from. The organization is doing the harvesting and chipping themselves. Feedstock is primary and consist of rubber stems and branches which are clear-cut as they no longer produce rubber sap(latex). The logs originating from aged and non-productive rubberwood compartments designated for replanting are extracted and chipped at harvesting site inside the plantation. After chipping the wood chips are transported to a storage site inside the plantation or at an intermediary storage site where it is left to dry for approximately 2 months.

From the storage site, where the wood chips have been drying, it will upon arrival of vessel be transported by truck directly to the port for loading on vessel. The wood chips are either sold according to the Incoterm FOB or CFR incoterms. The end points might be either Abidjan or San Pedro harbour or alternatively any port in Europe.

A Supply Base Evaluation has been completed and mitigating measures have been developed for specified risks. Biomass that is found to be in accordance with the risk mitigation procedures, and with any specified risk mitigated to low risk, will be categorized as SBP-compliant biomass.

### 5.2 Description of Company's Supply Base

SBIOCI consider the southern districts of Côte d'Ivoire as its supply base. The districts are Montagnes, Sassandra-Marahoué, Bas-Sassandra, Goh-Djiboua, Lagunes, Abidjan and Comoé. SBIOCI source rubberwood (*Hevea brasiliensis*), from industrially managed plantations with a size of +100 hectare.

#### **Forest cover**

Estimates of the amount of forested area in Côte d'Ivoire range due to use of different definitions of forest and because the National Forest Inventory has not been updated since 1979 (FCPF and UN-REDD, 2013)<sup>1</sup>.

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<sup>1</sup> FCPF and UN-REDD (2013). *Readiness Preparation Proposal, Country: Republic of Côte d'Ivoire*. Available from [https://forestcarbonpartnership.org/sites/fcp/files/2013/Nov2013/IvoryCoast\\_110813\\_RPP\\_English.pdf](https://forestcarbonpartnership.org/sites/fcp/files/2013/Nov2013/IvoryCoast_110813_RPP_English.pdf)



The range of estimates of remaining forest area is as follows:

- 10.4 million hectares 2010 (Food and Agriculture Organization, 2019)
- 3.4 million hectares 2015 (REDD+, 2017)
- App 3 million hectare, 2013 (FLEGT, 2013)

**The Government of Côte d'Ivoire use the forest estimate of 3.4 million hectare by REDD+ (2017), this is also the value and definition which SBIOCI use.**

Côte d'Ivoire encompasses four main phytogeographic zones REDD+ (2017):

- in the north, the Sudanese and sub-Sudanese sector, characterized by alternating clear forests, savannas wooded, trees and grassy lateritic plateaus;
- in the centre (V Baoulé), the pre-forest sector which is a transition zone consisting of a mosaic of savannas, open forests and dense semi-deciduous forests;
- in the centre, the mesophilic sector which is dense semi-deciduous forests;
- in the south, the ombrophilous area characterized by dense evergreen rainforest.

Up to 75 % of the land in the country is arable and Rubberwood is considered an agro-industrial product by the National Centre of Agricultural Research and REDD+ (2017) consider agro-industrial plantations as non-forest.

### **Deforestation – from 16 million hectare of forest in 1900 to 3.4 million in 2015**

Accelerated deforestation in Côte d'Ivoire, in particular due to extensive agriculture, uncontrolled bushfires, uncontrolled logging and mining and rampant urbanization has led to drastic reduction of forest cover.

From about 16 million hectares in 1900 the forest cover has been reduced to 3.4 million hectares in 2015. Forest cover, which was estimated to be 37% of the national territory in 1960, decreased to less than 14 % in 2010. The average rate of deforestation increased from 1.5 % per year between 1900 and 1980 to 4.3 % per year between 1990 and 2015, becoming the highest rate in the world at this time. Between 2000 and 2008, during the political crisis, the rate of deforestation reached 25 % in classified forest reserves. According to SODEFOR, the body in charge of managing classified forests, the rate of encroachment on classified forests increased from 18 % of the total area in 1996 to around 50 % in 2014

Analysis of causes for deforestation can be divided into direct and indirect drivers. The main direct driver for deforestation is agriculture (62 %) with areas being replaced primarily by cocoa farms (38 % of the agricultural area) and secondly by rubber plantations (23 % of agricultural area). A study similar to the analysis by the Ministry of Water and Forest, conducted in Taï National Park, reveal similar direct causes, however cocoa plantations replaced as much as 79,44 % of the forest area lost for agriculture<sup>2</sup>.

### **Rubberwood, major industries and production areas.**

Natural rubber, latex comes from the tree *Hevea brasiliensis* originating in Latin America. It was trialled in Côte d'Ivoire in the 1940's but cultivation was undertaken in 1953 by Compagnie Française de Caoutchouc d'Extrême-Orient et d'Afrique and Société Africaine de Plantation d'Hévéa (S.A.P.H) a year later.

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<sup>2</sup> Forest Carbon Partnership Facility (FCPF), Carbon fund. Emission Reduction Program Document (ER-PD) for Taï National Park, Republic of Côte d'Ivoire. World Bank 2019 – page 52

Following its independence in 1960, Côte d'Ivoire developed the natural rubber sector through the following actions:

- acquisition of an important stake in S.A.P.H.
- establishing the agro-industrial complex of Grand-Béréby (S.O.G.B.) in 1966
- encouraging the creation of new village plantations in Bonoua, Grand-Bereby, Dabou and Bettié between 1980 and 1985 and Gagnoa and Daoukro in the late 90's (all areas located in the southern part of the country).

The liberalisation of the sector took place in 1994 and was followed by a restructuring period which ended in 2001, against a backdrop of falling world market prices. Fortunately, a five-year long campaign to promote village plantations and an intense promotion of the sector between 2008 and 2012 lead to a revitalization of the natural rubber sector, mainly under the authority of the Government and the Association of rubber professionals (The Association of Natural Rubber Professionals of Côte d'Ivoire, APROMAC). A recent reform aims to further stabilize the sector.

World market prices on latex is found in the figure below. As can be seen the prices topped in 2010-2011 and have been falling to about 20% of the level today. With disappearing profit, small scale outgrowers and workers at agro-industrial plantation are at risk of losing their income, and plantations are at risk of being converted to other species e.g. cocoa, oil palm, agriculture etc.

In 2018 Côte d'Ivoire was the largest producer of latex in Africa with an estimated production of 800.000 tons. Production forecast for 2023 are 2 million tons, based on an increase of 165.000 small scale out growers planting rubber trees on 600.000 hectare. The industry is aware of the socio-economic challenge of food security versus the preservation of environment, and therefore focus new plantings on marginal areas<sup>3</sup>.

The annual harvested area of rubber (production starts when the trees are 7 years old) has been increasing over the last 10 years according to data from FAO<sup>4</sup>.

Year	Value (ha)
2008	120.000
2009	143.000
2010	167.356
2011	144.195
2012	155.286
2013	175.610
2014	189.647
2015	213.200
2016	276.552
2017	354.868

Total area of rubberwood is estimated at 500.000 - 600.000 hectare.

Today large industries including SIPH, “Société Africaine de Plantations d’Hévées” (SAPH), “Tropical Rubber Côte d’Ivoire” (TRCI), “Société des caoutchoucs de Grand-Béréby” (SoGB) are dominant in the production of the natural latex.

<sup>3</sup> <http://www.commodafrica.com/23-10-2018-irc-2018-la-production-de-caoutchouc-en-cote-divoire-triplera-dici-2023-2-mt>  
<sup>4</sup> <http://www.fao.org/faostat/en/#data/QC>

In addition to the three mentioned above, SBIOCI have contact to EXAT, they have about 1000 hectare of rubberwood plantation and replant about 50 hectare per year.

It is estimated that about 15 % of production is large scale agro-industrial plantations, while 85 % is by small scale outgrowers and SBIOCI will purchase material only from the large scale plantations.

### **Management practises**

In agro-industrial plantations rubber trees are grown for 30-40 years until the yield of latex is no longer profitable, the trees are considered overgrown. Around this point in time plantation managers plan which compartments to clear and replant in order to have a steady production of latex.

Overgrown rubber trees are considered waste and has traditionally been cut down and either used as firewood or burned on situ. A no burn policy has been implemented in many plantations and the plantations therefore let locals collect the timber as firewood, leave it to decay or chip it. A ban on rubberwood for firewood is also being considered.

With a growing use of wood chips in Europe, the opportunity now lies in use as feedstock for thermal power. Since the sole purpose of cutting trees down are done with the purpose of replanting (which is done by the plantation) the biomass from rubberwood will be a part of the transition from fossil fuel and adding value to a sustainable development.

As planned by plantation managers, the compartments selected for replanting are overturned by excavators. For biomass production process, the roots are cut of and the logs gets extracted and chipped at a central site inside the plantation. After chipping the logs, the wood chips are transported to a storage site inside the plantation or at an intermediary storage site where it is left to dry for approximately 2 months. The roots are piled in rows inside the compartments where they are left to rot.

The soil is normally clay, and precautions are taken to avoid compacting the soil when using heavy machinery. With 2 seasonal rain periods where work is difficult in the plantations, the effective window for forest work is 8-10 months.

After the trees have been removed, the compartments are replanted with the next generation of rubber trees. Approximately 500 trees are planted per hectare and latex production starts again after 7 years. Approximately 300 trees per hectare are left in a 40-year-old plantation.

A 30-year old cultivated rubber tree is about 30 m tall with an average branch-free bole of 3 m. The diameter at breast height (dbh) may reach about 30 cm.

The National Centre for Agricultural Research recommend the following major steps for establishing rubberwood plantations:

1. Rubber cultivation requires well-drained deep soils with an annual rainfall of at least 1500 mm, well distributed and an altitude of less than 600 m.
2. After forest clearance: clear the ground in October, cut the undergrowth then the average trees and finally the big trees, burn plant debris and gather them in strips between the lines in January.
3. After fallow: Start in February-March depending on the device chosen.
4. In pure culture: sow the cover plant *Pueraria phaseolides* to prevent soil erosion and grassing. It takes 10 kg of seed for 1 hectare.
5. After the first rains, make the holes (40cm x 40cm and 60 cm deep).

6. In case of weeds, the following chemicals are recommended: glyphosate (Round Up: 8l / ha in 2 applications of 4l / ha each) or imazapyr (Arsenal: 10l / ha in a single application), Arsenal (5l / ha), Round Up (5l / ha), Garlon 4E (21l / ha), Garlon + 2,4-D (11 + 11l / ha), Tordon 101 (2.5l / ha);
7. Planting takes place at the beginning of the rainy season.

In the rain forest zone, the dominant soils are highly denatured ferralitic soils. According to Perraud (1971), "the soil fertility characteristics depend on the thickness and the percentage of coarse elements of the gravelly horizon: low if the gravelly horizon is more than one meter thick with 60% coarse elements, medium if it is only 40-50 cm and less than 40% coarse elements. The chemical properties only come into play secondarily: the highly denatured soils will be better adapted to oil palm or rubber crops, which can compensate for the poverty of mineral reserves by a large production volume, whereas moderately denatured soils will be more favourable to more demanding shrub crops such as coffee and cocoa.

For the risk of pesticides being washed out into water bodies, SBIOCI assess slope gradient and water bodies adjacent to the compartments harvested and plan the operation in a manner which minimize the risk.

The resource base (agro-industrial rubber plantations) are considered healthy and vital by the time of implementation of the biomass business. It is estimated the rotation periods in general not will be shortened as the biomass is a by-product with low value compared to latex.

### **Socio economic setting**

Côte d'Ivoire—the world's largest producer and exporter of cocoa beans and cashew nuts and a significant producer of coffee and palm oil—has enjoyed remarkable economic success since 2012 and is a major economic power in the West African subregion.

### **Importance of rubber**

Côte d'Ivoire is the first African producer of natural rubber and the 7th worldwide. Natural rubber competes with other cash crops such as cocoa or palm oil and usually occupies the 3rd or 4th place in the Ivorian economy. In 2013, it accounted for 6% of the country's exports.

Natural rubber is the livelihood of about 800,000 people who participate in various aspects of the value chain. It is believed that in rubber production zones, the level of poverty is around 30% as opposed to an average poverty rate of 48% for the rest of the country.

The European tyre industry represents the biggest market for the natural rubber of Côte d'Ivoire (70% of exports). Asia is the main destination for the rest of the Ivorian production. Only a residual volume is used locally. The rubber sector has 19 processing units with a total potential transforming capacity of 520,000 tons. The primary product is processed and exported as TSR rubber.

Once regarded as waste and burned locally or partially used as firewood, the overgrown rubber trees now face a new potential. Local employees working with the machinery extracting the wood, chipping operators, truck drivers and shippers will be employed as part of the local concession. This gives potentially work to more than 50 local nationals equally divided between skilled and non-skilled workers.

SBIOCI employs primarily local workers with a smallest possible contingent of expats who gradually will be phased out once the level and skills are improved. Operators of vital equipment is trained, according to a "on the job training-program".

In addition to the direct jobs created, indirect employment is within service industry supporting the crews operating the machines in the plantations and port as well as their dependencies.

As part of its social responsibility SBIOCI reinvest minimum 10% of revenue into new and similar projects.

### Conservation CITES or IUCN species

Côte d'Ivoire, has been a member of CITES for 25 years (1994), and has by August 2019 decided, with the support of the CITES Secretariat, to prepare national legislation that meets the general conditions for the implementation of CITES, in accordance with resolution 8.4 (Rev.Cop15). Therefore, on August 8-9th 2019 the Ministry of Water and Forest held a workshop with the objective of providing a solid legal basis for regulating international wildlife trade and sanctioning illegal trade from Côte d'Ivoire. The validation workshop was held as a prelude to CITES COP18, to be held in Geneva, Switzerland, from August 16 to 28, 2019, giving this validation workshop the opportunity to move towards a draft law, support for the sustainable management of natural resources policy, consistent and adapted to the situation of Côte d'Ivoire.

Côte d'Ivoire has accessed the CITES in 1994. The standing committee of CITES has by 6<sup>th</sup> of May 2019 recommended a re-suspension of trade with African teak (Afroormosia) *Pericopsis elata* from Côte d'Ivoire.

### Species status

#### Rubberwood

Rubberwood, *Hevea brasiliensis* is not to be found on the CITES checklist:

[http://checklist.cites.org/#/en/search/cites\\_region\\_ids%5B%5D=5&cites\\_appendices%5B%5D=I&cites\\_appendices%5B%5D=II&cites\\_appendices%5B%5D=III&output\\_layout=alphabetical&level\\_of\\_listing=0&show\\_synonyms=1&show\\_author=1&show\\_english=1&show\\_spanish=1&show\\_french=1&scientific\\_name=hevea&page=1&per\\_page=20](http://checklist.cites.org/#/en/search/cites_region_ids%5B%5D=5&cites_appendices%5B%5D=I&cites_appendices%5B%5D=II&cites_appendices%5B%5D=III&output_layout=alphabetical&level_of_listing=0&show_synonyms=1&show_author=1&show_english=1&show_spanish=1&show_french=1&scientific_name=hevea&page=1&per_page=20)

Rubberwood, *Hevea brasiliensis* is not to be found on the CITES I, II, III list nor IUCN checklist

<http://www.catalogueoflife.org/col/details/species/id/8edc954f2d64bff51f7dba2850930a/source/tree>

## 5.3 Detailed description of Supply Base

- a. Total volume of Feedstock\*: 0 – 200,000 tonnes
- b. Volume of primary feedstock\*: 0 – 200,000 tonnes
- c. List percentage of primary feedstock (g), by the following categories. - percentages may be shown in a banding between XX% to YY% if a compelling justification is provided\*. Subdivide by SBP-approved Forest Management Schemes:
  - Certified to an SBP-approved Forest Management Scheme: 0 %
  - Not certified to an SBP-approved Forest Management Scheme: 100 %
- d. List all species in primary feedstock, including scientific name: Rubberwood, *Hevea brasiliensis*
- e. Volume of primary feedstock from primary forest: None
- f. List percentage of primary feedstock from primary forest (j), by the following categories. Subdivide by SBP-approved Forest Management Schemes:
  - Primary feedstock from primary forest certified to an SBP-approved Forest Management Scheme: None all feedstock originates from non-forest agro-industrial plantations
  - Primary feedstock from primary forest not certified to an SBP-approved Forest Management Scheme: None, all feedstock originates from non-forest agro-industrial plantations
- g. Volume of secondary feedstock: N/A
- h. Volume of tertiary feedstock: N/A

Note that the quantitative description can be found in the Company's Supply Base Report.

## 5.4 Chain of Custody system

The BP has implemented a FSC CoC transfer system based on physical separation of the certified and non-certified material. However, FSC CoC is only theoretical exercise, as currently no rubber plantation in Ivory Coast is FSC certified and therefore it is unlikely that any material would be received with FSC claim. The BP foresees to purchase all material as SBP compliant through its SBE. In case material not complying with SBP standards would be received, it will be physically segregated in the port or it will not be accepted at all.

The BP is purchasing the material either as standing stock or after the trees have been harvested by bulldozers. In both cases, the chipping operation is done by the BP and the transport of the chips is done by an external sub-contractor. The chips are left at the plantation to dry and transported to port only when the vessel is ready.

Feedstock is purchased based on a contract with the plantation owner and the compartments to be harvested are clearly defined by both parties. The BP measures the moisture of the feedstock continuously (as the pile is left at the plantation) as well as the volume of the pile in m<sup>3</sup>. Records are kept by the BP. Once the material is loaded to the vessel, the BP receives the draft survey and Bill of Lading where the volume is also recorded. Upon arrival of the vessel in EU, the biomass is transported to the power plant, typically by truck, and volumes are specified on basis of weighbridge data and moisture measurement conducted by the power plants.

Each delivery is recorded in the DTS by the BP.

## 6 Evaluation process

### 6.1 Timing of evaluation activities

The pre-assessment took place on November 5<sup>th</sup> to 8<sup>th</sup> 2019 and include one auditor-day for head office audit, one half day for stakeholder consultation and 2.5 auditor day for onsite inspections of the plantations. The risk assessment was reviewed by four NEPCon experts prior the pre-assessments and in total 4 auditor-days were spend on desktop review.

The onsite assessment took place on February 11<sup>th</sup> to 14<sup>th</sup> 2020 and took 5 auditor-days. For details see the audit plan below.

Activity	Location	Auditor(s)	Date/time
Opening meeting*	Office	OT, GK	11/02/2020 09.00-09.30
Interview with SBP responsible person  Review of procedures, documents and interviews with responsible staff (review of the CoC system control point, mass balance, management system, verification of SBP compliant feedstock). Implementation of mitigation measures, SBP Risk Assessment, Supplier verification program. FSC CoC will be also reviewed.	Office	OT, GK	09.30-12.00
Break			13:00-13:30
Evaluation of purchasing activities  Reception of material, incoming delivery notes and invoices, volume recording,	Purchasing	OT, GK	13:30-14:15

mass balance, control of incoming volumes			
GHG calculation review  collection and communication of energy and carbon data, transport distances, volumes, moisture, SAR content	Office	OT, GK	14:15-15:30
Supply Base Evaluation  Review or conducted supplier audits, reports from audits, interview with responsible person, mitigation measures implemented	Office	OT, GK	15:30 – 17:30
Presentation of the results of the first day of assessment	Office	OT, GK	17:30-18:00
Evaluation of mitigation measures of primary feedstock:  Evaluation of FMUs with special focus on indicators identified in the RA as specified risk.	Supplier audit: TRCI	OT, GK	12/02/2020  9:00 – 17:00
Departure to San Pedro	Interview with responsible person for implementation of the SBE		13/02/2020  7:00
Evaluation of mitigation measures of primary feedstock:  Evaluation of FMUs with special focus on indicators identified in the RA as specified risk.	Consultation with local communities	OT, GK	16:00 – 19:00



Evaluation of mitigation measures of primary feedstock.  Evaluation of FMUs with special focus on indicators identified in the RA as specified risk.	Supplier audit: SAPH (Rapides Grah)	OT, GK	14/02/2020  07:00 – 12:00
Departure to Abidjan	Interview with responsible person for implementation of the SBE	OT, GK	13:00
Closing meeting*	Office	OT, GK	20:00
Estimated end of the evaluation			21:00

Name	Qualification
Ondrej Tarabus Lead auditor	Czech citizen, graduated from University of Life Sciences Prague, The Faculty of Forestry. He has participated in several SBP, FSC FM, FSC CoC, PEFC CoC, ISCC certification assessments in different countries. Ondřej Tarabus has been through lead assessor SBP training course and is experienced with carbon calculation using standards such as ISO 14 064, Carbon Footprint management or ISCC.
Georges Kouassi Trainee auditor, local expert, translator	Master in science and management environmental Consultation, West and central Africa, SAN Certification technical associate, RA-CERT Africa Lead auditor – Sustainable agriculture, Group and chain of custody standard, RAINFOREST ALLIANCE Lead auditor – Fair Trade USA Standard UTZ Auditor
Chloe Viala Risk assessment review	Chloe is a member of NEPCon’s department dealing with wood legality. She has previous working experience from Ivory Coast as well as other African countries and is well connected with local NGOs.
Pilar Gorria Risk assessment review	Forestry engineer graduated in Polytechnic University of Madrid. She has participated in several FSC&PEFC and SBP assessments in different countries. Pilar Gorría successfully completed SBP training course and he has practical experience with carbon footprint certification as well as biofuels certification.

## 6.2 Description of evaluation activities

The pre-assessment took place on November 5th to 8th 2019 and included evolution in the office, visit of two plantations and stakeholder consultation. The risk assessment was reviewed by three NEPCon experts prior the pre-assessments. Number of comments to different indicators were provided and prior and during the pre-assessment.

The onsite assessment took place on February 11th to 14th 2020

The evaluation visit was focused on management system evaluation: division of the responsibilities, document and system, input material classification (reception and registration), analysis of the existing CoC system and CoC system control points as well as GHG data availability as well as evaluation of the CCP (for details see section 5.4).

Description of the audit evaluation:

All SBP related documentation connected to the SBP as well as FSC CoC system of the organisation, including SBP Procedure, SAR and GHG data calculations, Supply Base Report, risk assessment and FSC system description was provided by the company at the beginning of assessment. The assessment started with an opening meeting attended by the representatives from Organisation's management and staff.

Auditor introduced the audit team, provided information about audit plan, methodology, auditor qualification, confidentiality issues, and assessment methodology and clarified certification scope. During the opening meeting the auditor explained CB's approval related issues.

After that auditor went through all applicable requirements of the SBP standards nr. 1, 2, 4, 5 and instruction document 5E covering input clarification, existing chain of custody system, management system, CoC, recordkeeping/mass balance requirements, emission and energy data and categorisation of input and verification of SBP-compliant feedstock. During the process, overall responsible person for SBP system and other staff were interviewed.

Prior to the onsite visit the auditor sampled the plantations to be visited. Due to long distances and situation of the road network, the sampled sites were provided to BP prior the assessment. The auditor used formula of  $y=\sqrt{x}$  rounded up, to define the number of plantations to be visited. This resulted in 2 plantations to be visited as the total number of plantations was 3. However, in fact the auditor visited all relevant plantations as there is one plantation where the work had already started and one plantation where the BP is close to signing the contract. The third plantation (which was not visited) is only under consideration and the negotiations with the owner had not started yet.

The Critical control points is the implementation of the mitigation measures and tracking the material back to its origin to assure that only material from suppliers included in the scope of SBE are used to source the feedstock. These CCPs were evaluated in detail.

Impartiality commitment: NEPCon commits to using impartial auditors and our clients are encouraged to inform NEPCon management if violations of this are noted. Please see our Impartiality Policy here:

<http://www.nepcon.org/impartiality-policy>

## 6.3 Process for consultation with stakeholders

Both the BP and the CB have conducted stakeholder consultations. The consultations were conducted in two ways, sending direct emails to different relevant stakeholders (60 days before the assessment by BP and 30 days by CB) and by means of onsite meetings with stakeholders organized jointly by BP and CB.

When it comes to stakeholder notifications, the stakeholders were invited to comment initially a draft Risk Assessment and later the completed Supply Base Report and Risk Assessment. First, all identified stakeholders were contacted by e-mail and later on by phone with a prospectus for a face to face meeting at SBIOCI's office in Abidjan.

The first stakeholder meeting took place during the pre-assessment in November 2019 with two participants, one from the NanguiAbrogoua university and one from association GPSNR. The second stakeholder meeting was in form of a more formal workshop and took place in Abidjan on January 14<sup>th</sup> 2020. Both industry and NGO representative participated on this workshop.

In conclusion, it was quite challenging to make the stakeholders involved in the process and even though a lot of effort and time was invested into it by both BP and CB, the results were quite limited and the face to face events were attended only by 6 stakeholders in total. The SBR (including Annex 1) was also circulated between different international and national NGOs working in the rubber sector, but also outside that, and with the SBP agri-biomass working group members, but no comments which would lead to change of the risk assessment content were received.

## 7 Results

### 7.1 Main strengths and weaknesses

**Strengths** – The organization is well managed by dedicated personnel, is working directly with the plantation owners and thus with a short supply chain, SBP certification has had a very high priority with the BP, and part of the profit (cca 10%) is reinvested into local projects.

**Weaknesses** – The BP is working in a very risky environment (high corruption perception, unclear/contradicting legislation, different communities interests, poor working conditions etc.), very complex system of mitigation measures which requires good interview skills as well as high level of integrity, and this requires a lot of effort and continuous monitoring. Due to the level of risk and the complexity of the mitigation measures the smallholders are excluded from the scope which therefore exclude them from the possibility of getting additional income.

### 7.2 Rigour of Supply Base Evaluation

The Supply Base is agro-industrial rubberwood plantations located in the Southern part of Côte d'Ivoire, the districts of origin are Montagnes, Sassandra-Marahoué, Bas-Sassandra, Goh-Djiboua, Lagunes, Abidjan and Comoé. The scope only covers agro-industrial plantations with 100+ hectares. The species covered is rubberwood (*Hevea brasiliensis*).

Due to the level of risk (especially connected with social indicators) the BP has decided to limit the scope of the certificate to large (100+ hectares) plantations only.

The BP has decided to define the scope for each indicator depending on where they see the risk connected with their operation. This concept was discussed with the CB prior the assessment and accepted. It also helped to facilitate the implementation of the mitigation measures. The following categories were identified:

1. **Harvesting:** The risk is linked with specific compartment, including only wood harvested by the BP, excluding any operations linked with production or rubber. Applicable for indicators relevant for the wood extracted, or training of the employees.
2. **Plantation:** Entire plantation including rubber production areas, biodiversity and forest areas, and all non-forest areas and including all activities which takes place within certain plantation area.
3. **Supplier:** Defined for the most critical indicators such as conversion, high carbon stocks and tenure rights. All plantations linked to the supplier's company registration number. Such plantations might be located in different sites within one country.

Such evaluation resulted in following definition of the risk level for each SBP indicator.

1.1.1 - The Biomass Producer’s Supply Base is defined and mapped	Harvesting
1.1.2 - Feedstock can be traced back to the defined Supply Base	Harvesting
1.1.3 - The feedstock input profile is described and categorised by the mix of inputs.	Harvesting
1.2.1 - The Biomass Producer has implemented appropriate control systems and procedures to ensure that legality of ownership and land use can be demonstrated for the Supply Base	Supplier
1.3.1 - The BP has implemented appropriate control systems and procedures to ensure that feedstock is legally harvested and supplied and is in compliance with EUTR legality requirements	Plantation
1.4.1 - The Biomass Producer has implemented appropriate control systems and procedures to verify that payments for harvest rights and timber, including duties, relevant royalties and taxes related to timber harvesting, are complete and up to date.	Harvesting
1.5.1 - The Biomass Producer has implemented appropriate control systems and procedures to verify that feedstock is supplied in compliance with the requirements of CITES.	Supplier
1.6.1 - The Biomass Producer has implemented appropriate control systems and procedures to ensure that feedstock is not sourced from areas where there are violations of traditional or civil rights	Plantation
2.1.1 - The Biomass Producer has implemented appropriate control systems and procedures for verifying that forests and other areas with high conservation values are identified and mapped.	Plantation
2.1.2 - The Biomass Producer has implemented appropriate control systems and procedures to identify and address potential threats to forests and other areas with high conservation values from forest management activities.	Plantation
2.1.3. - The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is not sourced from forests converted to production plantation forest or non-forest lands after January 2008.	Supplier
2.2.1 - The Biomass Producer has implemented appropriate control systems and procedures to verify that feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimise them	Harvesting
2.2.2 - The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is sourced from forests where management maintains or improves soil quality (CPET S5b).	Plantation
2.2.3 - The Biomass Producer has implemented appropriate control systems and procedures to ensure that key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b).	Plantation
2.2.4 - The Biomass Producer has implemented appropriate control systems and procedures to ensure that biodiversity is protected (CPET S5b).	Plantation
2.2.5 - The Biomass Producer has implemented appropriate control systems and procedures for verifying that the process of residue removal minimises harm to ecosystems	Plantation

2.2.6 - The Biomass Producer has implemented appropriate control systems and procedures to verify that negative impacts on ground water, surface water and water downstream from forest management are minimised (CPET S5b).	Plantation
2.2.7 - The Biomass Producer has implemented appropriate control systems and procedures for verifying that air quality is not adversely affected by forest management activities	Plantation
2.2.8 - The Biomass Producer has implemented appropriate control systems and procedures for verifying that there is controlled and appropriate use of chemicals, and that Integrated Pest Management (IPM) is implemented wherever possible in forest management activities (CPET S5c).	Plantation
2.2.9 - The Biomass Producer has implemented appropriate control systems and procedures for verifying that methods of waste disposal minimise negative impacts on forest ecosystems (CPET S5d)	Plantation
2.3.1 - Analysis shows that feedstock harvesting does not exceed the long-term production capacity of the forest, avoids significant negative impacts on forest productivity and ensures long-term economic viability. Harvest levels are justified by inventory and growth data.	Plantation
2.3.2 - Adequate training is provided for all personnel, including employees and contractors (CPET S6d).	Harvesting
2.3.3 - Analysis shows that feedstock harvesting, and biomass production positively contribute to the local economy, including employment.	Harvesting
2.4.1 - The Biomass Producer has implemented appropriate control systems and procedures for verifying that the health, vitality and other services provided by forest ecosystems are maintained or improved (CPET S7a).	Plantation
2.4.2 - The Biomass Producer has implemented appropriate control systems and procedures for verifying that natural processes, such as fires, pests and diseases are managed appropriately (CPET S7b).	Plantation
2.4.3 - The Biomass Producer has implemented appropriate control systems and procedures for verifying that there is adequate protection of the forest from unauthorised activities, such as illegal logging, mining and encroachment (CPETS7c).	Plantation
2.5.1 - The Biomass Producer has implemented appropriate control systems and procedures for verifying that legal, customary and traditional tenure and use rights of indigenous people and local communities related to the forest are identified, documented and respected (CPET S9).	Supplier
2.5.2 - The Biomass Producer has implemented appropriate control systems and procedures for verifying that production of feedstock does not endanger food, water supply or subsistence means of communities, where the use of this specific feedstock or water is essential for the fulfilment of basic needs.	Plantation
2.6.1 - The Biomass Producer has implemented appropriate control systems and procedures for verifying that appropriate mechanisms are in place for resolving grievances and disputes, including those relating to tenure and use rights, to forest management practices and to work conditions.	Plantation
2.7.1 - The Biomass Producer has implemented appropriate control systems and procedures for verifying that Freedom of Association and the effective recognition of the right to collective bargaining are respected.	Plantation

2.7.2 - The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is not supplied using any form of compulsory labour.	Plantation
2.7.3 - The Biomass Producer has implemented appropriate control systems and procedures to verify that feedstock is not supplied using child labour.	Plantation
2.7.4 - The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is not supplied using labour which is discriminated against in respect of employment and occupation	Plantation
2.7.5 - The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is supplied using labour where the pay and employment conditions are fair and meet, or exceed, minimum requirements.	Plantation
2.8.1 - The Biomass Producer has implemented appropriate control systems and procedures for verifying that appropriate safeguards are put in place to protect the health and safety of forest workers (CPET S12).	Harvesting
2.9.1 - Biomass is not sourced from areas that had high carbon stocks in January 2008 and no longer have those high carbon stocks	Supplier
2.9.2 - Analysis demonstrates that feedstock harvesting does not diminish the capability of the forest to act as an effective sink or store of carbon over the long term.	Plantation
2.10.1 - Genetically modified trees are not used.	Plantation

The auditor evaluated this definition of the risk levels and agrees with the results. It was discussed if indicators such as compulsory or child labour shouldn't be extended to "supplier" level but it was agreed that such activity would be quite difficult to verify for plantations with a large number of sites and it is expected that if the plantation complies in one site, the same conditions would apply elsewhere. However, it is something to consider in the future.

### 7.3 Collection and Communication of Data

The organization has contracted external consultation with extensive experience with SBP. At the moment of the assessment, most of the data are estimation as the BP has not started to trade biomass yet. However, considering the fact, that the BP uses mobile chippers only, there is very limited data to be collected and these will be collected based on the actual data. The BP has a good system in place to collect these data.

### 7.4 Competency of involved personnel

To conduct the risk analysis and implement the SBP-certification process, SBIOCI assigned Anders Bjørnkjær-Nielsen who is an external consultant. Co-founder Bo Christensen is responsible for managing the process. Co-founder Klaus Kroll organized the structure and the initial testing of the mitigation measures. The person responsible for the onsite implementation of the mitigation measures (especially conducting the interviews with local communities and workers of the plantations) was Toure Atchoumoutio Germaine employed directly by the BP.

### **Personnel competency**

Anders Bjørnkjær-Nielsen holds a Master of Science in Forest Management and a Graduate Diploma in Financial Accounting. He has extensive expertise as forester (18 years) as follows:

- 1 year working as development worker for an NGO in Zimbabwe
- 3 years trade with hard and soft wood in China, South Korea and Japan
- 6 years as operational manager and CFO in a large scale Christmas Tree company in DK/UK
- 4 years as CFO in a larger NGO working in Mali, Sierra Leone, Nigeria, Cameroun and Central Africa Republic in West Africa.
- 4 years in B4Trees a socio-economic company based in Denmark and Burkina Faso, specialized in assisting companies with FSC / PEFC / SBP certification and trade in non-timber forest products.

Additionally, agricultural development consultancies in Sierra Leone and Guinea Conakry

Anders Bjørnkjær-Nielsen was contracted as he has extensive working experience with SBP from Denmark, Sweden and Germany and also has extensive experience from West Africa.

Bo Christensen has an extensive field management and business development experience from West Africa within telecoms, trade, commercial inspection and security. His first assignment in the region commenced in 1998. His responsibility is with daily administration.

Klaus Kroll is officer of the reserve from the Danish Army with several deployments throughout the Middle East and Balkans. In civil life former Head of Security for Maersk Nigeria and CEO of a transportation company as well as a forestry and gardening company. He is responsible for equipment, sourcing and sales.

Toure Atchoumoutio Germaine holds a master in bioanthropology (2015) and is in process with a phd in bioanthropology. She has experience from socio-anthropological projects i.e. "certification of the legality and traceability of classified forests" and "urban pollution of the air and respiratory diseases, non-transmittable in Westafrica". Mrs Toure is an employee of the BP on a part time position.

## **7.5 Stakeholder feedback**

No relevant stakeholder comments were received via email. But the comments below were received during face to face meetings:

Comment no. 1

STH: Quantitative and qualitative assessment of the resource base. Will the harvest of biomass shorten the rotation period.

BP: It was explained to the stakeholder that this won't be applicable for the large scale plantations as the revenue would not cover the costs of new established planation. This might be relevant for the small holders but these are out of scope.

Comment no. 2

STH: Water impact: Which mitigation measures is it possible to put in place in order to mitigate water run-off with pesticides.

BP: Mitigation measure was adapted to consider the slope and use of chemicals and possible run off to water streams.

Comment no. 3



STH: The stakeholder claims that the old law said that property rights are vested only in Ivorian individuals, the state and communities. In this sense, the TRCI would only benefit from an emphyteutic lease, that is to say that it is not the owner of the land but rather the user of the land.

Then, he claims that the land question by declaring that more investigation is needed to see if the State has respected the procedure of the purge of customary rights. In other words, he proposes that the BP make sure that the State has fulfilled its purge of customary rights from the populations of the village.

BP: The mitigation measure set in a way that should address the stakeholder comments. The stakeholder did not oppose the risk designation, nor the mitigation measure implemented, but rather stressed the complexity of the situation. The mitigation measure was explained to the stakeholder and accepted.

Comment no. 4

STH: Stakeholder proposes to check with to check the GPS coordinates of the plantation in order to certify the extent of the plantations since 2008 (mapping of the boundaries of the TRCI plantation).

BP: This is done always when the GPS coordinates are available and part of the mitigation measures as explained to the stakeholder.

Comment no. 5

STH: The stakeholder wished to check if there is a Health Committee at the TRCI level, in order to better understand the working conditions of agricultural workers on the rubber plantations.

BP: This is not part of the system as the mitigation measure when it comes to H/S is controlled at the harvesting level only (workers doing the harvesting and chipping operation)

Comment no. 6

STH: Ultimately, it appears that the SBIOCI constituted a good assessment of the base of its biomass supply. However, errors are to be taken into account on the land law. Verifications should be made more to ensure the veracity of all the information received. Thus, investigations must be made more in order to obtain traces, from the CADASTRE and the OFFICIAL JOURNAL to see how the State acquired the lands and also if there was the purge of customary rights the village of Abadjin-Kouté.

BP: The BP is using extended interview with local communities to find out if there was any purge on customary rights or if there are any conflicts in respect to tenure rights. The BP refuses to check the official cadaster records, as they already check the land certificates which is the lease document between the state and the plantations, and it is expected that the cadaster data and the lease contract will be always matching as they are both under the competence of the same authority.

Comment 7

STH: Local communities were contacted and consulted, some members of the local communities were worried that after chipping of the wood, the plantation will disappear and they will lose their job or there won't be any fire wood left.

BP: It was explained by the BP and the chief of the plantation that this is just a replanting process, and there still will be enough branches to collect as firewood.

## 7.6 Preconditions

No open preconditions are left. All major NCR were closed by the end of the assessment.

## 8 Review of Company’s Risk Assessments

*Describe how the Certification Body assessed risk for the Indicators. Summarise the CB’s final risk ratings in Table 1, together with the Company’s final risk ratings. Default for each indicator is ‘Low’, click on the rating to change. Note: this summary should show the risk ratings before AND after the SVP has been performed and after any mitigation measures have been implemented.*

The first version of the risk assessment was sent to NEPCon by the BP in September 2019 and it was reviewed by four NEPCon experts.

Ondrej Tarabus - Lead auditor

Georges Kouassi - Local expert

Chloe Viala – Legality expert with working experience in Ivory Coast

Pilar Gorria - Risk assessment reviewer

The initial review resulted in number of comments which were sent to the BP and were addressed before pre-assessment in November 2019. During the pre-assessment, the risk assessment was reviewed based on the experience from the field and number of additional changes were requested by the CB. During the assessment, no comments with regards to the content of the risk designations were raised, and the final version presented during the assessment was accepted. There were only comments with regards to the mitigation measures – for details see NCR section below.

**Table 1. Final risk ratings of Indicators as determined BEFORE the SVP and any mitigation measures.**

Indicator	Risk rating (Low or Specified)	
	Producer	CB
1.1.1	Specified	Specified
1.1.2	Specified	Specified
1.1.3	Low	Low
1.2.1	Specified	Specified
1.3.1	Specified	Specified
1.4.1	Low	Low
1.5.1	Specified	Specified
1.6.1	Specified	Specified
2.1.1	Low	Low
2.1.2	Low	Low

Indicator	Risk rating (Low or Specified)	
	Producer	CB
2.3.3	Low	Low
2.4.1	Low	Low
2.4.2	Low	Low
2.4.3	Low	Low
2.5.1	Specified	Specified
2.5.2	Low	Low
2.6.1	Specified	Specified
2.7.1	Specified	Specified
2.7.2	Specified	Specified
2.7.3	Specified	Specified

2.1.3	Specified	Specified
2.2.1	Specified	Specified
2.2.2	Specified	Specified
2.2.3	Low	Low
2.2.4	Low	Low
2.2.5	Specified	Specified
2.2.6	Specified	Specified
2.2.7	Specified	Specified
2.2.8	Specified	Specified
2.2.9	Specified	Specified
2.3.1	Low	Low
2.3.2	Specified	Specified

2.7.4	Specified	Specified
2.7.5	Specified	Specified
2.8.1	Specified	Specified
2.9.1	Specified	Specified
2.9.2	Specified	Specified
2.10.1	Low	Low

**Table 2. Final risk ratings of Indicators as determined AFTER the SVP and any mitigation measures.**

Indicator	Risk rating (Low or Specified)	
	Producer	CB
1.1.1	Low	Low
1.1.2	Low	Low
1.1.3	Low	Low
1.2.1	Low	Low
1.3.1	Low	Low
1.4.1	Low	Low
1.5.1	Low	Low
1.6.1	Low	Low
2.1.1	Low	Low
2.1.2	Low	Low
2.1.3	Low	Low
2.2.1	Low	Low
2.2.2	Low	Low
2.2.3	Low	Low
2.2.4	Low	Low
2.2.5	Low	Low
2.2.6	Low	Low
2.2.7	Low	Low
2.2.8	Low	Low

Indicator	Risk rating (Low or Specified)	
	Producer	CB
2.3.3	Low	Low
2.4.1	Low	Low
2.4.2	Low	Low
2.4.3	Low	Low
2.5.1	Low	Low
2.5.2	Low	Low
2.6.1	Low	Low
2.7.1	Low	Low
2.7.2	Low	Low
2.7.3	Low	Low
2.7.4	Low	Low
2.7.5	Low	Low
2.8.1	Low	Low
2.9.1	Low	Low
2.9.2	Low	Low
2.10.1	Low	Low

2.2.9	Low	Low
2.3.1	Low	Low
2.3.2	Low	Low

## 9 Review of Company's mitigation measures

### 1.1.1 The Biomass Producer's Supply Base is defined and mapped.

The BP has presented following options how to mitigate the risk to low:

- Drone maps or other maps of sufficient scale and quality.
- Contract covering the area of operation.
- Land title (Titre foncier / certificat foncier).
- Map indicating the position of the plantation in the district.
- Check with list of "forêt classée" that no such area is within the harvesting area.

The BP has provided contracts with the suppliers and a map of the plantation provided by the suppliers where the area is clearly mapped.

### 1.1.2 Feedstock can be traced back to the defined Supply Base.

The mitigation measure proposed by the BP is following:

- Official transport documents provided by ministry in charge of forestry affairs.
- Dimension of wood chips in stacks/piles. Wood chips designated for powerplants in EU have specific and unique dimensions which will be different from most other wood chips produced locally in Côte d'Ivoire.
- Woodchipper equipped with GPS tracking equipment. Woodchipper has 24 hour GPS tracking. The woodchipper is adjusted to produce wood chips of dimensions defined by powerplants in EU.
- Recording of location of woodchipper. The location of the woodchipper is recorded by GPS and will be stored for 5 years.
- Trucks equipped with 1) GPS tracking equipment with 24-hour tracking or 2) truck logbooks with manual departure/arrival logs.
- A GPS based fleet management system is preferred to a excel based system, but both are accepted.
- Records of movement of trucks kept for 5 years.
- Truck logbook of all deliveries linked to stack/pile and registrations of deliveries in either the port of Abidjan or San Pedro.
- Harvest in each plantation is completed before the chipping equipment is moved to a new site.
- Internal control 1: Registration and location of woodchipper.
- Internal control 2: Registration of routes of trucks.
- Internal control 3: Registered deliveries in port against pick-up points at stack/pile.
- Internal control 4: Calculation of volume of wood chips originating from plantation, linking the volume, via conversion factors, to volumes registered by power plants in EU. Volumes in plantations calculated on the basis of harvest area provided by measurement on drone maps or other maps of sufficient scale and quality.

The BP has provided records for all the above mentioned points during the assessment, except the records for the truck deliveries as there was no movement of chips so far (all chips are still at the plantation of origin).

**1.2.1 The Biomass Producer has implemented appropriate control systems and procedures to ensure that legality of ownership and land use can be demonstrated for the Supply Base.**

The mitigation measures are divided in 3 groups:

- A. Contract with seller;
- B Land title document of supplier;
- C consultation with communities.

Mitigation measures will be implemented on the supplier considering all land managed by the supplier (including sites where the biomass is not harvested from).

Regarding A, Contract with seller:

- In the contract it is stated that: “SELLER guarantees, that within their entire company’s activities, it is not directly or indirectly involved in displacement of people related to the effects of the Law of 1998 or other”.
- “SELLER will allow, and actively cooperate with, any third-party due diligence activities researching the possible conversion of forest to non-forest, displacement of people or deforestation activities. SELLER guarantees full transparency in respect of any possible stakeholder consultancies.

Regarding B, land title document (Titre foncier / certificat foncier) of the supplier:

- Copy of full land title (Titre foncier / certificat foncier) document for all plantations covered by the supplier’s registration number.
- If changes have been made since 2008, these shall be provided too.  
Other supporting documents.

Regarding C, consultation with communities surrounding all plantations of the supplier:

- Questionnaire focusing on clarifying if the area of the plantation has expanded since 2008. If the area has expanded then which disputes there has been on registration of land rights, going back to 2008.
- Questionnaire uncovering violation of traditional rights.
- Persons to be interviewed are local Prefects, leaders of woman groups.
- Interview guide and main rules (no manager present, random contact, minimum 3 interviews per community, anonymity)
- If persons interviewed report about disputes, then more people shall be interviewed until a conclusion can be reached and described.
- If the conclusion is that ownership hasn’t been achieved through consensus and transparency, then the plantation will be excluded from sourcing biomass.
- If violation of traditional rights take place, then biomass cannot be sourced from the plantation before documented consensus has been achieved and a follow up program has been put in place.
- If there are ongoing land conflict issues, then biomass cannot be sourced from the plantation before the conflicts have been settled through consensus and transparency.
- SBIOCI can choose (not compulsory) to investigate if a finding about disputes from the communities is supported by local courts.
- Questionnaires to be saved for 5 years.

The organization has presented the signed contracts as well “titre foncier” to provide evidence of land rights. Additionally, an interview was conducted with the person responsible for conducting the interviews with the local communities and the interviews were witnessed.

**1.3.1 The BP has implemented appropriate control systems and procedures to ensure that feedstock is legally harvested and supplied and is in compliance with EUTR legality requirements.**

Mitigation measure

- The SBP Risk Assessment and all Mitigation Measures will serve as SBIOCI’s EUTR DDS system for European clients.

The SBP risk assessment was reviewed and found compliant with EUTR requirements

**1.5.1 The Biomass Producer has implemented appropriate control systems and procedures to verify that feedstock is supplied in compliance with the requirements of CITES.**

The mitigation measures are divided in 5 groups: A. Contract with seller; B Land title document of supplier; C analysis of historical maps or reports; D. On-site inspection of replanting and expansion areas replanted between 2008 and present day; E consultation with communities.

Mitigation measures will be implemented on the supplier.

Regarding A, Contract with seller:

- In the contract it is stated that: “SELLER guarantees that within their entire company’s activities, it is not engaged directly or indirectly in conversion of any forest or protected forest to non-forest, agro-industrial plantations or other purposes” .
- SELLER guarantees, that within their entire company’s activities, it is not directly or indirectly involved in deforestation in rural areas.
- “SELLER will allow, and actively cooperate with, any third-party due diligence activities researching the possible conversion of forest to non-forest, displacement of people or deforestation activities. SELLER guarantees full transparency in respect of any possible stakeholder consultancies.

Regarding B, land title document (Titre foncier / certificat foncier) of the supplier:

- Copy of full land title (Titre foncier / certificat foncier) document for all plantations covered by the supplier’s registration number.
- If changes have been made since 2008, these shall be provided too.
- Other supporting documents

Regarding C: Analysis of historical maps or reports

- On the basis of historical maps or records, data for the following matrix are established:

Plantation #1	Forêt classée (ha)	Bio-diversity area or forest area (ha)	Rubber plantation (ha)	Other area e.g. housing and factory (ha)	Replanted area (ha)	Expansion of plantation (ha)	Total (ha)
Year	(1)	(2)	(3)	(4)	(5)	(6)	(7)
2008							
2015							
Present							

Conclusion from the matrix:

- Any decline in the area of forêt classée (1), biodiversity area or other forest area (2) from 2008 to 2015 to present will lead to exclusion of the supplier.
- An increase in the area “expansion of plantation” shall lead to an investigation if the area was forested in 2008. If the area was forested in 2008 the supplier will be excluded.

Regarding D, on-site inspection of replanted areas (5) and expansion areas (6) from 2008 until present day.

- On-site inspection to be carried out by a forester or biologist
- Compartment register with following info:

- Compartment no.
  - Size (ha or acre)
  - Year of establishment
  - Comments
- For each compartment the on-site inspection has the purpose of assessing if the compartment by January 2008 was forest, rubber plantation or other (housing, cocoa, oil palm, etc).

Regarding E, consultation with communities surrounding all plantations of the supplier:

- Questionnaire focusing on clarifying if the area of the plantation has expanded since 2008. If the area has expanded then which disputes there has been on registration of land rights, going back to 2008.
- Questionnaire uncovering violation of traditional rights.
- Persons to be interviewed are local Prefects, leaders of woman groups.
- Interview guide and main rules (no manager present, random contact, minimum 3 interviews per community, anonymity)
- If persons interviewed report about disputes, then more people shall be interviewed until a conclusion can be reached and described.
- If the conclusion is that ownership hasn't been achieved through consensus and transparency, then the plantation will be excluded from sourcing biomass.
- If violation of traditional rights take place, then biomass cannot be sourced from the plantation before documented consensus has been achieved and a follow up program has been put in place.
- If there are ongoing land conflict issues, then biomass cannot be sourced from the plantation before the conflicts have been settled through consensus and transparency
- SBIOCI can choose (not compulsory) to investigate if a finding about disputes from the communities is supported by local courts.
- Questionnaires to be saved for 5 years

This indicator was evaluated in the same way as conversion

**1.6.1 The Biomass Producer has implemented appropriate control systems and procedures to ensure that feedstock is not sourced from areas where there are violations of traditional or civil rights.**

The mitigation measures are divided in 3 groups:

- A. Contract with seller;
- B. B Land title document of supplier;
- C. C consultation with communities.

Mitigation measures will be implemented on the supplier.

Regarding A, Contract with seller:

- In the contract it is stated that: "SELLER guarantees, that within their entire company's activities, it is not directly or indirectly involved in displacement of people related to the effects of the Law of 1998"
- "SELLER will allow, and actively cooperate with, any third-party due diligence activities researching the possible conversion of forest to non-forest, displacement of people or deforestation activities. SELLER guarantees full transparency in respect of any possible stakeholder consultancies.

Regarding B, land title document (Titre foncier / certificat foncier) of the supplier:

- Copy of full land title (Titre foncier / certificat foncier) document for all plantations covered by the supplier's registration number.
- If changes have been made since 2008, these shall be provided too.
- Other supporting documents.

Regarding C, consultation with communities surrounding all plantations of the supplier:



- Questionnaire focusing on clarifying if the area of the plantation has expanded since 2008. If the area has expanded then which disputes there has been on registration of land rights, going back to 2008.
- Questionnaire uncovering violation of traditional rights.
- Persons to be interviewed are local Prefects, leaders of woman groups.
- Interview guide and main rules (no manager present, random contact, minimum 3 interviews per community, anonymity)
- If persons interviewed report about disputes, then more people shall be interviewed until a conclusion can be reached and described.
- If the conclusion is that ownership hasn't been achieved through consensus and transparency, then the plantation will be excluded from sourcing biomass.
- If violation of traditional rights take place, then biomass cannot be sourced from the plantation before documented consensus has been achieved and a follow up program has been put in place.
- If there are ongoing land conflict issues, then biomass cannot be sourced from the plantation before the conflicts have been settled through consensus and transparency
- SBIOCI can choose (not compulsory) to investigate if a finding about disputes from the communities is supported by local courts.
- Questionnaires to be saved for 5 years

The organization has presented the signed contracts as well "titre foncier" to provide evidence land rights. Additionally, an interview was conducted with the person responsible for conducting the interviews with the local communities and the interviews were witnessed.

### **2.1.3 The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is not sourced from forests converted to production plantation forest or non-forest lands after January 2008.**

The mitigation measures are divided in 5 groups:

- A. Contract with seller;
- B. Land title document of supplier;
- C. Aanalysis of historical maps or reports;
- D. On-site inspection of replanting and expansion areas replanted between 2008 and present day;
- E. Consultation with communities.

Mitigation measures will be implemented on the supplier.

Regarding A, Contract with seller:

- In the contract it is stated that: "SELLER guarantees that within their entire company's activities, it is not engaged directly or indirectly in conversion of any forest or protected forest to non-forest, agro-industrial plantations or other purposes" .
- SELLER guarantees, that within their entire company's activities, it is not directly or indirectly involved in deforestation in rural areas.
- "SELLER will allow, and actively cooperate with, any third-party due diligence activities researching the possible conversion of forest to non-forest, displacement of people or deforestation activities. SELLER guarantees full transparency in respect of any possible stakeholder consultancies.

Regarding B, land title document (Titre foncier / certificat foncier) of the supplier:

- Copy of full land title (Titre foncier / certificat foncier) document for all plantations covered by the supplier's registration number.
- If changes have been made since 2008, these shall be provided too.
- Other supporting documents

Regarding C: Analysis of historical maps or reports

- On the basis of historical maps or records, data for the following matrix are established:

Plantation #1	Forêt classée (ha)	Bio-diversity area or forest area (ha)	Rubber plantation (ha)	Other area e.g. housing and factory (ha)	Replanted area (ha)	Expansion of plantation (ha)	Total (ha)
Year	(1)	(2)	(3)	(4)	(5)	(6)	(7)
2008							
2015							
Present							

Conclusion from the matrix:

- Any decline in the area of forêt classée (1), biodiversity area or other forest area (2) from 2008 to 2015 to present will lead to exclusion of the supplier.
- An increase in the area “expansion of plantation” shall lead to an investigation if the area was forested in 2008. If the area was forested in 2008 the supplier will be excluded.

Regarding D, on-site inspection of replanted areas (5) and expansion areas (6) from 2008 until present day.

- On-site inspection to be carried out by a forester or biologist
- Compartment register with following info:
  - Compartment no.
  - Size (ha or acre)
  - Year of establishment
  - Comments
- For each compartment the on-site inspection has the purpose of assessing if the compartment by January 2008 was forest, rubber plantation or other (housing, cocoa, oil palm, etc).

Regarding E, consultation with communities surrounding all plantations of the supplier:

- Questionnaire focusing on clarifying if the area of the plantation has expanded since 2008. If the area has expanded then which disputes there has been on registration of land rights, going back to 2008.
- Questionnaire uncovering violation of traditional rights.
- Persons to be interviewed are local Prefects, leaders of woman groups.
- Interview guide and main rules (no manager present, random contact, minimum 3 interviews per community, anonymity)
- If persons interviewed report about disputes, then more people shall be interviewed until a conclusion can be reached and described.
- If the conclusion is that ownership hasn’t been achieved through consensus and transparency, then the plantation will be excluded from sourcing biomass.
- If violation of traditional rights take place, then biomass cannot be sourced from the plantation before documented consensus has been achieved and a follow up program has been put in place.
- If there are ongoing land conflict issues, then biomass cannot be sourced from the plantation before the conflicts have been settled through consensus and transparency
- SBIOCI can choose (not compulsory) to investigate if a finding about disputes from the communities is supported by local courts.
- Questionnaires to be saved for 5 years

Conversion of rubber plantations or compartments to urban development projects will be assessed by:

- Officially approved permissions and accordance with legislation

- Justification: in which way will the conversion of the rubber plantation help communities or environment
- Due Diligence that the rubber plantation does not originate from converted forest procedure A to E above.

The organization presented the signed contracts as well as Titre foncier to provide evidence of land rights. Additionally, an interview was conducted with the person conducting the interviews on behalf of the BP with the local communities and the interviews with the communities were witnessed by the auditor. It was confirmed by the communities that there was no extension of the plantation on the costs of the forest. The BP also presented data collected from the plantation regarding the size of plantation in 2008 compared to today, as well as size of replanted area per year and size of forest located at the plantation in 2008 and today. Additionally, the online map from 2008 and 2019 was presented as evidence that there was no forest on the area which is covered by plantation back in 2008.

The BP has presented the description of the mitigation measure which specifies that “On the basis of historical maps or records, data for the following matrix are established” and mention the details of data which shall be gathered, but it does not specify where to gather the data to be considered credible. Additionally, the BP has stated that based on online maps it was clear that there was a plantation before 2008.

### **2.2.1 The Biomass Producer has implemented appropriate control systems and procedures to verify that feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimise them.**

The mitigation measures are divided in 4 groups:

- A. Contract with seller;
- B. Elevation;
- C. WHO pesticides;
- D. Maintenance intervals.

Mitigation measures will be implemented on the harvesting operation.

Regarding A, contract with seller:

- In the contract it is stated that: SELLER guarantees that harvesting, storage and logistics does not take place in areas where harvesting is legally prohibited, and that harvesting will not threaten the local biodiversity or is done inside riparian buffer zones, on slopes of watersheds and on hillsides.
- SELLER guarantees that there is a controlled and appropriate use of pesticides and chemicals, and that an Integrated Pest Management plan is implemented wherever possible in their management activities.
- SELLER guarantees that there is no storage or usage of chemicals found on WHO's list of type 1A and 1B pesticides, and that there is no usage of forbidden pesticides found in international agreements.
- SELLER has a procedure for protecting neighbouring forests from pests and diseases from their plantation activities.
- SELLER guarantees that all efforts are made to mitigate soil erosion risks, including avoidance of weeding.
- SELLER guarantees, that the sale area(s) will be replanted with rubber trees once biomass extraction operations are completed, and no later than 12 months from start of harvesting.
- SELLER does its best to prevent oil spills, minimize damage to soil and protect buffer zones. SELLER mitigates environmental damage via regular maintenance of production processes and environmental protection system (air pollution control, waste, water treatment systems, etc.).

SELLER has implemented emergency procedures to prevent and address accidents affecting the environment and human health SELLER minimizes the use and ensure safe handling and storage of chemical and other dangerous substances.

### Regarding B, Slope gradient and erosion

- Introduction: various factors (slope gradient, soil type, length of slope, vegetation cover) can be used in order to scientifically calculate this risk of soil erosion. The slope gradient of the plantations and compartments vary in the supply base from nearly flat areas to steeper areas in the districts of Bas-Sassandra and Montagnes. The areas can be divided into three general groups in terms of gradient :
  1. Near flat terrain ( $<3^{\circ}$ ) ;
  2. moderate slopes ( $3^{\circ}$ - $10^{\circ}$ ) moderate risk of gully erosion and
  3. steep slopes ( $10$ - $20^{\circ}$ ) high risk of gully erosion.In all 3 groups rubber production takes place and skidding is planned in non-rainy periods. The need for land use control is as follows :
  - Near flat ( $<3^{\circ}$ ): sheet erosion can take place, but acceleration is not likely
  - Moderate ( $3^{\circ}$ - $10^{\circ}$ ): prevention of erosion control measures is needed
  - Steep ( $10$ - $20^{\circ}$ ) : planning is crucial, high risk of gully erosion
- On-site inspection by forester or biologist, classifying level of elevation
- Harvesting operations are limited on steep slopes to the following: max compartment size is 25-hectare, downstream runoff water is protected by compartments of min. same size as the upstream harvested compartment.

### Regarding C, pesticides

- The scope is that biomass is a by-product from latex production, therefore pesticides aren't used for the purpose of producing biomass.
- Pesticide waste packing inspection. Registration of active ingredients.
- Pesticide storage packing inspection. Registration of active ingredients
- Checking pesticide registration from storage room and waste packing inspection against WHO 1A "Extremely hazardous" and 1B "Highly hazardous" lists.
- If 1A or 1B pesticides are found the number of checks will be increased.
- Both 1A and 1B registrations will lead to a warning about breach of contract.
- Two mitigation measures for the harvesting area are linked to WHO 1A and 1B pesticides - it is the commercial intention to encourage the plantations to limit their usage of the hazardous pesticides.
  - 1B "Highly hazardous" registrations will lead to a limitation in operational area. Only biomass from near-flat terrain ( $<3^{\circ}$ ) and moderate slopes ( $3^{\circ}$ - $10^{\circ}$ ) can be purchased from the plantation.
  - 1A "Extremely hazardous" registrations will to a limitation in operational area. Only biomass from near-flat terrain ( $<3^{\circ}$ ) can be purchased from the plantation.
- Monitoring of impact of the mitigation measure: future registration of 1A and 1B pesticides when the plantation is re-visited for another harvesting operation.

### Regarding D, maintenance of machinery

- Maintenance schedule
- Registration of maintenance

The auditor reviewed the report from the first onsite visit, where the slope was measured (this was doublechecked onsite) and also the list of chemicals used (again doublechecked onsite in the chemical storage). The chemicals were checked against the WHO list of chemicals to find out if any of the chemicals used were listed as 1A or 1B – none of the chemicals was listed as such (only moderate or slightly

hazardous). Finally, the auditor assessed the storage of the chemicals at the plantation to verify the data provided by the BP.

**2.2.2 The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is sourced from forests where management maintains or improves soil quality (CPET S5b).**

The mitigation measures are divided in 2:

- A. Contract with seller
- B. Slope gradient and erosion

Mitigation measures will be implemented on the plantation

Regarding A contract with seller

- SELLER guarantees that all efforts are made to mitigate soil erosion risks, including avoidance of weeding
- SELLER guarantees, that the sale area(s) will be replanted with rubber trees once biomass extraction operations are completed, and no later than 12 months from start of harvesting.

Regarding B, Slope gradient and erosion

- Introduction: various factors (slope gradient, soil type, length of slope, vegetation cover) can be used in order to scientifically calculate this risk of soil erosion. The slope gradient of the plantations and compartments vary in the supply base from nearly flat areas to steeper areas in the districts of Bas-Sassandra and Montagnes. The areas can be divided into three general groups in terms of gradient :
  1. Near flat terrain (<3°) ;
  - 2, moderate slopes (3°-10°) moderate risk of gully erosion and
  3. steep slopes (10-20°) high risk of gully erosion.

In all 3 groups rubber production takes place and skidding is planned in non-rainy periods. The need for land use control is as follows :

- Near flat (<3°): sheet erosion can take place, but acceleration is not likely
- Moderate (3°-10°): prevention of erosion control measures is needed
- Steep (10-20°) : planning is crucial, high risk of gully erosion
- On-site inspection by forester or biologist, classifying level of elevation
- Harvesting operations are limited on steep slopes to the following: max compartment size is 25 hectares; downstream runoff water is protected by compartments of min. same size as the upstream harvested compartment. Extraction route indicated on map, visualizing that soil erosion is minimized.
- Damage to terraces to be repaired shortly after extraction of rubber stems, to avoid erosion

The auditor reviewed the report from the first onsite visit where the slope was measured. This was doublechecked onsite and matched with the real slope. The description of the mitigation measure specifies for moderate slope, that erosion control measures should take place, but does not specify what these measures are. Also, it is not allowed to conduct the operation in rainy season, but no specification of the season is included in the procedure. There is no information how the size of the clear cut will be taken into account.

**2.2.5 The Biomass Producer has implemented appropriate control systems and procedures for verifying that the process of residue removal minimises harm to ecosystems**

The mitigation measures are divided in 3:

- A. Contract with seller;
- B. Pre-harvest meeting;
- C. Post-harvest control

Mitigation measures will be implemented on the plantation

Regarding A, contract with seller

- SELLER guarantees, that roots not extracted are not burned but left to rot and decay.

Regarding B, pre-harvest meeting

- Pre-harvest meeting, training to leave the roots in the plantation
- Signed instruction document

Regarding C, post-harvest control

- On-site inspection, confirming that roots are left in piles covered with a minor layer of soil.
- Signed report

Interview with the workers onsite revealed good understanding about management of the roots. The sites visited contained roots left in lines.

**2.2.6 The Biomass Producer has implemented appropriate control systems and procedures to verify that negative impacts on ground water, surface water and water downstream from forest management are minimised (CPET S5b).**

The mitigation measures are divided in 4:

- A. Contract with seller;
- B. WHO pesticides;
- C. Preharvest meeting;
- D. Post-harvest control

Mitigation measures will be implemented on the plantation.

Regarding A, contract with seller

- SELLER guarantees that there is no storage or usage of chemicals found on WHO's list of type 1A and 1B pesticides, and that there is no usage of forbidden pesticides found in international agreements.
- SELLER guarantees that harvesting, storage and logistics does not take place in areas where harvesting is legally prohibited, and that harvesting will not threaten the local biodiversity or is done inside riparian buffer zones, on slopes of watersheds and on hillsides.
- S.BIO.CI will not harvest outside of the designated sale area(s) and will not operate heavy machinery during heavy rain season if such movements are likely to impact soil quality negatively.

Regarding B, pesticides

- The scope is that biomass is a by-product from latex production, therefore pesticides aren't used for the purpose of producing biomass.
- Pesticide waste packing inspection. Registration of active ingredients.
- Pesticide storage packing inspection. Registration of active ingredients
- Checking pesticide registration from storage room and waste packing inspection against WHO 1A "Extremely hazardous" and 1B "Highly hazardous" lists.
- If 1A or 1B pesticides are found the number of checks will be increased.
- Both 1A and 1B registrations will lead to a warning about breach of contract.

- Two mitigation measures for the harvesting area are linked to WHO 1A and 1B pesticides - it is the commercial intention to encourage the plantations to limit their usage of the hazardous pesticides.
  - 1B “Highly hazardous” registrations will lead to a limitation in operational area. Only biomass from near-flat terrain (<3°) and moderate slopes (3°-10°) can be purchased from the plantation.
  - 1A “Extremely hazardous” registrations will to a limitation in operational area. Only biomass from near-flat terrain (<3°) can be purchased from the plantation.
- Monitoring of impact of the mitigation measure: future registration of 1A and 1B pesticides when the plantation is re-visited for another harvesting operation.

Regarding C, preharvest meeting

- Skidding takes place during periods without heavy rain. Harvesting dates are registered.
- Training of machinery operators to leave 10 m no-cut zone around water bodies. Signed training records
- SBIOCI personal check the turning over trees in no-cut zones during the process. Signed reports.

Regarding D, Post-harvest

- Check ditches
- Check damage to 10m no-cut zone
- Check damage to riparian, protected or biodiversity zones

The list of chemicals (again doublechecked onsite in the chemical storage) were checked in the WHO list of chemicals to find out if any of the chemicals used was listed as 1A or 1B – none of the chemicals was listed as such (only moderate or slightly hazardous). The pre-harvesting report was reviewed, no waterbody was identified and interviews revealed that the employees know about the requirements.

**2.2.7 The Biomass Producer has implemented appropriate control systems and procedures for verifying that air quality is not adversely affected by forest management activities.**

The mitigation measures are divided in 3:

- A. Contract with seller;
- B. Extraction of biomass;
- C. Post-harvest control;

Mitigation measures will be implemented on the plantation

Regarding A, contract with seller

- SELLER guarantees, that roots not extracted are not burned but left to rot and decay.

Regarding B, extraction of biomass

- SBIOCI’s business is extraction, chipping, transporting to large scale generator for a clear combustion with as high an energy efficiency as possible.

Regarding C, post-harvest control

- Checking for the existence of old fireplaces inside the plantation

In the case that old fireplaces are found the plantation will be asked to stop it. Upon reoccurrence the supplier will be excluded.

Onsite visit confirmed that there were no fireplaces in the plantation. Contract with the supplier included that the roots will not be burned.

**2.2.8 The Biomass Producer has implemented appropriate control systems and procedures for verifying that there is controlled and appropriate use of chemicals, and that Integrated Pest Management (IPM) is implemented wherever possible in forest management activities (CPET S5c).**

The mitigation measures are divided in 4 groups: A. Contract with seller; B. Slope gradient and erosion; C. WHO pesticides; D. Best practice

Mitigation measures will be implemented on the plantation

Regarding A, contract with seller:

- SELLER guarantees that there is a controlled and appropriate use of pesticides and chemicals, and that an Integrated Pest Management plan is implemented wherever possible in their management activities
- SELLER guarantees that there is no storage or usage of chemicals found on WHO's list of type 1A and 1B pesticides, and that there is no usage of forbidden pesticides found in international agreements.
- SELLER minimizes the use and ensure safe handling and storage of chemical and other dangerous substances

Regarding B, Slope gradient and erosion

- Introduction: various factors (slope gradient, soil type, length of slope, vegetation cover) can be used in order to scientifically calculate this risk of soil erosion. The slope gradient of the plantations and compartments vary in the supply base from nearly flat areas to steeper areas in the districts of Bas-Sassandra and Montagnes. The areas can be divided into three general groups in terms of gradient :  
1. Near flat terrain (<3°) ; 2. moderate slopes (3°-10°) moderate risk of gully erosion and 3. steep slopes (10-20°) high risk of gully erosion. In all 3 groups rubber production takes place and skidding is planned in non-rainy periods. The need for land use control is as follows :
  - Near flat (<3°): sheet erosion can take place, but acceleration is not likely
  - Moderate (3°-10°): prevention of erosion control measures is needed
  - Steep (10-20°) : planning is crucial, high risk of gully erosion
- On-site inspection by forester or biologist, classifying level of elevation
- Harvesting operations are limited on steep slopes to the following: max compartment size is 25 hectares; downstream runoff water is protected by compartments of min. same size as the upstream harvested compartment.

Regarding C, pesticides

- The scope is that biomass is a by-product from latex production, therefore pesticides aren't used for the purpose of producing biomass.
- Pesticide waste packing inspection. Registration of active ingredients.
- Pesticide storage packing inspection. Registration of active ingredients
- Checking pesticide registration from storage room and waste packing inspection against WHO 1A "Extremely hazardous" and 1B "Highly hazardous" lists.
- If 1A or 1B pesticides are found the number of checks will be increased.
- Both 1A and 1B registrations will lead to a warning about breach of contract.
- Two mitigation measures for the harvesting area are linked to WHO 1A and 1B pesticides - it is the commercial intention to encourage the plantations to limit their usage of the hazardous pesticides.
  - 1B "Highly hazardous" registrations will lead to a limitation in operational area. Only biomass from near-flat terrain (<3°) and moderate slopes (3°-10°) can be purchased from the plantation.
  - 1A "Extremely hazardous" registrations will lead to a limitation in operational area. Only biomass from near-flat terrain (<3°) can be purchased from the plantation.



- Monitoring of impact of the mitigation measure: future registration of 1A and 1B pesticides when the plantation is re-visited for another harvesting operation.

D. Best practice

- In order to develop the plantation IPM system, best practice manuals are sent to supplying plantations.

The list of chemicals used (again doublechecked onsite in the chemical storage) were checked in the WHO list of chemicals to find out if any chemical used was listed as 1A or 1B – none of the chemicals was listed as such (only moderate or slightly hazardous).

**2.2.9 The Biomass Producer has implemented appropriate control systems and procedures for verifying that methods of waste disposal minimise negative impacts on forest ecosystems (CPET S5d).**

The mitigation measures are in 3 groups: A. Contract with seller; B. On-site check of pesticide disposal; C.

Best practice

Mitigation measures will be implemented on the plantation

Regarding A, On-site check list of pesticide waste disposal method:

- What system for waste disposal is in place?
- How and where are the empty containers stored?
- Documented frequency by which the suppliers of pesticide collect the empty containers
- Are pesticide containers re-used for other pesticides
- Are pesticide containers re-used for water or food
- Are empty containers left in the field?

If the supplier is found to have poor waste disposal methods in place, the plantation will be asked to improve these. If improvements aren't found after being addressed repeatedly the supplier can be excluded.

- Best management practise.

Auditor witnessed the responsible person as she evaluated the plantation against these requirements and how the conclusion is taken.

**2.3.2 Adequate training is provided for all personnel, including employees and contractors (CPET S6d).**

Mitigation measures will be implemented on the harvest operation

SBIOCI on-boarding training program

- All personnel is introduced to the company through a onboarding program containing the company policies, including company provisions, (Insurance, food, housing, transport) company expectations, purpose and content of certification, fuel regime, basic HSSE procedures and an overall introduction to daily operations. Employees operating machines or otherwise are engaged in physical operations are either specifically trained on the equipment (e.g. American operator training staff on chipper) or is recruited from operating similar equipment. All employees are individually tested in their functions prior to operation, both in an operational context and HSSE procedures for their specific function. After appropriate training staff is required to sign for reception of information and training. Training is targeted an audience with lack of reading and writing skills. The overall purpose is understanding of certification requirements, adopting a zero incident work environment, smooth daily production a gradual increase in skill level.
- Training records

Training records were signed by all workers identified during the onsite visit. Also, the interview revealed good understanding of their responsibilities.

**2.5.1 The Biomass Producer has implemented appropriate control systems and procedures for verifying that legal, customary and traditional tenure and use rights of indigenous people and local communities related to the forest are identified, documented and respected (CPET S9).**

The mitigation measures are divided in 3 groups:

- A. Contract with seller;
- B. Land title document of supplier;
- C. Consultation with communities.

Mitigation measures will be implemented on the supplier.

Regarding A, Contract with seller:

- In the contract it is stated that: "SELLER guarantees, that within their entire company's activities, it is not directly or indirectly involved in displacement of people related to the effects of the Law of 1998"
- "SELLER will allow, and actively cooperate with, any third-party due diligence activities researching the possible conversion of forest to non-forest, displacement of people or deforestation activities. SELLER guarantees full transparency in respect of any possible stakeholder consultancies.

Regarding B, land title document (Titre foncier / certificat foncier) of the supplier:

- Copy of full land title (Titre foncier / certificat foncier) document for all plantations covered by the supplier's registration number.
- If changes have been made since 2008, these shall be provided too.
- Other supporting documents

Regarding C, consultation with communities surrounding all plantations of the supplier:

- Questionnaire focusing on clarifying if the area of the plantation has expanded since 2008. If the area has expanded then which disputes there has been on registration of land rights, going back to 2008.
- Questionnaire uncovering violation of traditional rights.
- Persons to be interviewed are local Prefects, leaders of woman groups.
- Interview guide and main rules (no manager present, random contact, minimum 3 interviews per community, anonymity)
- If persons interviewed report about disputes, then more people shall be interviewed until a conclusion can be reached and described.
- If the conclusion is that ownership hasn't been achieved through consensus and transparency, then the plantation will be excluded from sourcing biomass.
- If violation of traditional rights take place, then biomass cannot be sourced from the plantation before documented consensus has been achieved and a follow up program has been put in place.
- If there are ongoing land conflict issues, then biomass cannot be sourced from the plantation before the conflicts have been settled through consensus and transparency
- SBIOCI can choose (not compulsory) to investigate if a finding about disputes from the communities is supported by local courts.
- Questionnaires to be saved for 5 years

The organization has presented the signed contracts as well “titre foncier” to provide evidence land rights. Additionally, an interview was conducted with the person responsible for conducting the interviews with the local communities, and the interviews were witnessed.

**2.6.1 The Biomass Producer has implemented appropriate control systems and procedures for verifying that appropriate mechanisms are in place for resolving grievances and disputes, including those relating to tenure and use rights, to forest management practices and to work conditions.**

The mitigation measures are divided in 3 groups:

- A. Contract with seller;
- B. Land title document of supplier;
- C. Consultation with communities.

Mitigation measures will be implemented on the supplier.

Regarding A, Contract with seller:

- In the contract it is stated that: “SELLER guarantees, that within their entire company’s activities, it is not directly or indirectly involved in displacement of people related to the effects of the Law of 1998” “SELLER will allow, and actively cooperate with, any third-party due diligence activities researching the possible conversion of forest to non-forest, displacement of people or deforestation activities. SELLER guarantees full transparency in respect of any possible stakeholder consultancies.

Regarding B, land title document (Titre foncier / certificat foncier) of the supplier:

- Copy of full land title (Titre foncier / certificat foncier) document for all plantations covered by the supplier’s registration number.
- If changes have been made since 2008, these shall be provided too.
- Other supporting documents

Regarding C, consultation with communities surrounding all plantations of the supplier:

- Questionnaire focusing on clarifying if the area of the plantation has expanded since 2008. If the area has expanded then which disputes there has been on registration of land rights, going back to 2008.
- Questionnaire uncovering violation of traditional rights.
- Persons to be interviewed are local Prefects, leaders of woman groups.
- Interview guide and main rules (no manager present, random contact, minimum 3 interviews per community, anonymity)
- If persons interviewed report about disputes, then more people shall be interviewed until a conclusion can be reached and described.
- If the conclusion is that ownership hasn’t been achieved through consensus and transparency, then the plantation will be excluded from sourcing biomass.
- If violation of traditional rights take place, then biomass cannot be sourced from the plantation before documented consensus has been achieved and a follow up program has been put in place.
- If there are ongoing land conflict issues, then biomass cannot be sourced from the plantation before the conflicts have been settled through consensus and transparency
- SBIOCI can choose (not compulsory) to investigate if a finding about disputes from the communities is supported by local courts.
- Questionnaires to be saved for 5 years

The organization has presented the signed contracts as well “titre foncier” to provide evidence of land rights. Additionally, an interview was conducted with the person responsible for conducting the interviews with the local communities, and the interviews were witnessed.

### **2.7.1 The Biomass Producer has implemented appropriate control systems and procedures for verifying that Freedom of Association and the effective recognition of the right to collective bargaining are respected.**

The mitigation measures are as follows: A, Interview with workers; B, Best practice for plantation  
Mitigation measures will be implemented on the plantation.

Interview with workers in the plantation:

- Questionnaire focusing on workers knowhow about syndicates and delegates
- Interview guide and main rules (no manager present, random contact, sample size calculation, anonymity)
- If persons interviewed report no poor know how more persons shall be asked
- Documentation from questioned workers:
  - ID card
  - Full name
  - What info has your employer given to you about syndicates?
  - Which syndicates do you know?
  - Which syndicate are you member of:
  - What are the benefits of being member of a syndicate?
  - Have you been asked not to join a syndicate?
- Conclusion 1: Worker is well informed and maybe member of a syndicate = OK
- Conclusion 2: Worker lacks info about syndicates = > supplier is given info about best practice
- Conclusion 3: Workers are discouraged from joining syndicates = > exclusion of supplier
- Interview reports with findings
- Questionnaires to be saved for 5 years

Reports from the interviews were reviewed and some interviews were witnessed. It turned out that out of 40 interviews done, 12 were done with the sub-contractor employees. While no direct employee from the plantation complained about the lack of possibility to join the unions, 4 out of 12 employees from the unions were complaining about this issue. The BP decided to follow up on this issue with the employees and organized a meeting between all the employees the responsible personnel from the plantation in order to investigate this issue (held on 7<sup>th</sup> February 2020). Additionally, both sub-contractors were contacted to discuss the issue. The result of the BP after the meeting with 75 employees and responsible person from the plantation was that “The conclusion is that the statements given in the previous report can be partially true but not necessarily comprehensive. ... The meeting however did rise the potential issues and the subcontracted directly order to fix any issues that he might have”. The auditor conducted an interview during the assessment with a worker from the same sub-contractors and following issues were revealed:

- 1) The workers are not allowed to join the unions under a threat of losing their job
- 2) The vacations are not paid and in case longer time off the work is taken (even agreed with the employer) the person might lose their job
- 3) There were cases where the workers were fired from their work without getting paid

- 4) The OOP (rubber boots) were not provided by the employer, but had to be purchased by the employee
- 5) The wage paid was between CFA20.000 and CFA100.000 per week depending on the production. The minimum income in the country is CFA36.000. No free housing and health insurance is provided. This means that in some months, the employees are not paid the minimum salary defined by local law.

### **2.7.2 The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is not supplied using any form of compulsory labour.**

The mitigation measures are divided in 4 groups: A. Contract with seller; B. Policy of association; C consultation with communities; D cross check of ID numbers of interviewed personal with HR records of employment and salary.

Mitigation measures will be implemented on the plantation

Regarding A, Contract with seller:

- Both parties ensure that there is no participation in any form of forced or bonded labour and comply with minimum wage standards. Both parties ensure that employment-related decisions are based on relevant and objective criteria.

Regarding B, policy of association:

- If SBIOCI get information through news channels, stakeholders, etc. about suppliers involvement (including areas where we are not sourcing from) in conversion of forest to plantation, child labour, forced labour, destruction of high carbon stocks or violation of tenure rights, then the supplier will immediately be investigated and during this process no sourcing of feedstock will take place.

Regarding C, interview with workers in the plantation:

- Questionnaire focusing on uncovering forced labour as defined by ILO:  
<https://www.ilo.org/global/topics/forced-labour/definition/lang--en/index.htm>
- Interview guide and main rules (no manager present, random contact, sample size calculation, anonymity)
- If persons interviewed report about disputes, then more people shall be interviewed until a conclusion can be reached and described.
- Documentation from questioned personal:
  - ID card
  - Full name
  - Regular payment
  - Contract,
  - Working hours
  - Salary levels
  - Issues of debt
- If the conclusion is that either the plantation or sub-contractors use forced labour the supplier will be excluded from sourcing biomass.
- Interview reports with findings.
- Questionnaires to be saved for 5 years.

Regarding D, cross check of ID numbers of interviewed personal with HR records of employment and salary

- Full anonymity system
- Information of interviewed personal to be confirmed by HR department.
- Zero tolerance policy:

- If irregularities are found between the results from interviews and HR registrations for 1-3 persons (for each sample of 10 persons interview), this is an indication of forced labour. Further interviews to be conducted until a conclusion can be reached.
- If irregularities are found between the results from interviews and HR registrations for 3+ persons (for each sample of 10 persons interview), this is a strong indication of forced labour. No further interviews, the supplier will be excluded

Both stakeholder workshops were attended by the CB where the topic was discussed, and the stakeholders agreed with the specified risk and agreed with the proposed mitigation measure. The interview with workers were conducted by the auditor, who also witnessed how the BP representative was doing the interviews. During the interview, the BP representative asked question about working hours, overtime and in case there is overtime work, if this is voluntary. The answers were recorded in the interview checklists and 40 checklists were reviewed during the audit.

### **2.7.3 The Biomass Producer has implemented appropriate control systems and procedures to verify that feedstock is not supplied using child labour.**

The mitigation measures are divided in 4 groups: A. Contract with seller; B. Policy of association; C interview with workers; D Documentation from human resource depart of supplier;

Mitigation measures will be implemented on the plantation

Regarding A, Contract with seller:

- SELLER guarantees that it is not using child labour

Regarding B, policy of association:

- If SBIOCI get information through news channels, stakeholders, etc. about suppliers involvement (including areas where we are not sourcing from) in conversion of forest to plantation, child labour, forced labour, destruction of high carbon stocks or violation of tenure rights, then the supplier will immediately be investigated and during this process no sourcing of feedstock will take place.

Regarding C, interview with workers in the plantation:

- Questionnaire focusing on uncovering child labour.
- Interview guide and main rules (no manager present, random contact, sample size calculation, anonymity)
- If persons interviewed report about disputes, then more people shall be interviewed until a conclusion can be reached and described.
- Documentation from questioned personal:
  - Registration of ID no.
  - Full name
  - Age: Under 16 => conclusion=exclusion
  - Between 16 and 18 years of age, type of work: => hazardous or heavy work = exclusion
  - Daily and weekly number of working hours
    - Daily and weekly number of hours limited according to labour code.
    - Limitations exceeded = exclusion
- If the conclusion is that there are children under the age of 16, the supplier will be excluded. This also count for the supplier, if sub-contractors use child labour.
- Interview reports with findings will be saved for 5 years

Regarding D, cross check info from interview with human resource department

- Full anonymity system
- Register of workers below 18 years of age (legal requirement labour code, law No. 2015-532)
- Company policy for workers between 16 and 18 years of age
- Contract of workers between 16 and 18 years of age

- Medical documentation that the work done by the 16-18 is within their physical strength. No hazardous work allowed.
- Registration of workers below 16 years of age, shall be investigated. If documented the supplier will be excluded
- Zero tolerance policy:
  - If irregularities are found between the results from interviews and HR registrations for 1-3 persons (for each sample of 10 persons interview), this is an indication of child labour. Further interviews to be conducted until a conclusion can be reached.
  - If irregularities are found between the results from interviews and HR registrations for 3+ persons (for each sample of 10 persons interview), this is a strong indication of child labour. No further interviews, the supplier will be excluded.

Both stakeholder workshops were attended by the CB where the topic was discussed, and the stakeholders agreed with the specified risk and agreed with the proposed mitigation measure. The interview with workers were conducted by the auditor, who also witnessed how the BP representative is doing the interviews. During the interview, the BP representative asked questions as to whether the person had ever witnessed any children working in the plantation and if children are allowed to help. The answers were recorded in the interview checklists and 40 checklists were reviewed during the audit.

**2.7.4 The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is not supplied using labour which is discriminated against in respect of employment and occupation.**

The mitigation measures defined by the BP are divided in 3 groups:

- A. Contract with seller;
- B. Payroll package score linked to biomass price
- C. Best practice.

Mitigation measures will be implemented on the plantation.

Regarding A, Contract with seller:

- Both parties ensure that employment-related decisions are based on relevant and objective criteria

Regarding B, payroll package score linked to biomass price

- Introduction: Sustainable Agricultural Standard SAN 2017 version 1.2. chapter regarding continuous improved criteria has inspired the creation of the system.
- Basic decent income for a family of 2 adults and 4 children including all sources of income is calculated by [www.living-income.com](http://www.living-income.com) at 262.000 CFA/month
- Logic: Family consist of two working individuals, and other income than wages (sale of surplus crops grown, trading etc.) assumed to equal CFA 62.000 month), leaving target of CFA 100.000/month per adult.
- Sub-contractors will be assessed against the same scheme and conditions.
- If the salary of “Agricultural workers” does not reach 50% of target, supplier will be excluded from sourcing to SBIOCI.

Example:

Payroll target	CFA100.000	100 % for 1 employee. Level to be clarified by stakeholder consultation every second year
Payroll item		Remark and reference
Salary	CFA36.000	Salary below SMAG disqualifies - salary is the average for the lowest paid job category
Free housing	CFA29.850	Decent housing cost: <a href="https://www.living-income.com/single-post/2018/09/26/C%C3%B4te-d%E2%80%99Ivoire-Validating-the-Living-Income-Benchmark-for-cocoa-growing-regions">https://www.living-income.com/single-post/2018/09/26/C%C3%B4te-d%E2%80%99Ivoire-Validating-the-Living-Income-Benchmark-for-cocoa-growing-regions</a>

Free electricity	CFA9.148	Avg kWh/price = 72,604 CFA ( <a href="https://www.globalpetrolprices.com/Ivory-Coast/electricity_prices/">https://www.globalpetrolprices.com/Ivory-Coast/electricity_prices/</a> ) - avg. consumption is = Avg consumption/capita = 252 kWh  Household consumption = 6 pax = 252 x 72,604 = 109.777 CFA/year/household = CFA 9.148/month
Family insurance	CFA15.172	
Pension CNPS	CFA2.772	Employer contribution = 7,7 % - <a href="http://www.cnps.ci/Anglais/employer/social-contributions/Pages/Contribution-rate.aspx">http://www.cnps.ci/Anglais/employer/social-contributions/Pages/Contribution-rate.aspx</a>
Other in-kind benefits		Valuation to be discussed and documented by plantations
Total value of payroll package	CFA92.942	
Payroll package percentage of target	92,94%	
<b>The plantation is paid 92,94 % of the agreed price per metric tons</b>		

**Compliance and development targets:**

The target price of for the payroll package will be assess by a stakeholder consultation every 2 years.

- [www.living-income.com](http://www.living-income.com)
- Plantations with payroll package calculations of “Agricultural workers” which do not reach 50% of target will be excluded from sourcing to SBIOCI.
- Unequal salaries for women will as part of the average calculations result in a lower percentage and thereby lower price at the plantation.

**Documentation:**

- Pay rolls or overview of salaries provided by HR
- Subcontractors functions at the plantation if any
- Annual documented estimate of percentage of activities managed by sub-contractors
- Copy of insurances
- Workers contracts
- Other in-kind documentation

Regarding C. Best practice

Policy for equal rights between women and men

The auditor reviewed the mitigation measure provided by the BP. The Payrolls and the overview of the payrolls was revised by the BP.

**2.7.5 The Biomass Producer has implemented appropriate control systems and procedures for verifying that feedstock is supplied using labour where the pay and employment conditions are fair and meet, or exceed, minimum requirements.**

The mitigation measures are

A: minimum accepted condition combined

B, a payroll package score linked to biomass price.

Mitigation measures will be implemented on the plantation.

Regarding A, Minimum accepted condition:

- The “Salaire minimum agricole garanti (SMAG)” is set at 36.000 CFA per month.
  - Salary records of the last 6 months for the following worker group: “Agricultural workers”. Records of less than 36.000 CFA per month will lead to exclusion of the supplier.



- Average salary is calculated for the worker group “Agricultural workers”, this salary level defines the plantation.
- Identical calculations for sub-contractors. Records of less than 36.000 CFA per month will lead to exclusion of the supplier.

- Documentation that workers are paid for overtime work

Regarding B, payroll package score linked to biomass price

- Introduction: Sustainable Agricultural Standard SAN 2017 version 1.2. chapter regarding continuous improved criteria has inspired the creation of the system.
- Basic decent income for a family of 2 adults and 4 children including all sources of income is calculated by [www.living-income.com](http://www.living-income.com) at 262.000 CFA/month
- Logic: Family consist of two working individuals, and other income than wages (sale of surplus crops grown, trading etc.) assumed to equal CFA 62.000 month), leaving target of CFA 100.000/month per adult.
- Sub-contractors will be assessed against the same scheme and conditions.
- If the salary of “Agricultural workers” does not reach 50% of target, supplier will be excluded from sourcing to SBIOCI.

Example:

Payroll target	CFA100.000	100 % for 1 employee. Level to be clarified by stakeholder consultation every second year
Payroll item		Remark and reference
Salary	CFA36.000	Salary below SMAG disqualifies - salary is the average for the lowest paid job category
Free housing	CFA29.850	Decent housing cost: <a href="https://www.living-income.com/single-post/2018/09/26/C%C3%B4te-d%E2%80%99Ivoire-Validating-the-Living-Income-Benchmark-for-cocoa-growing-regions">https://www.living-income.com/single-post/2018/09/26/C%C3%B4te-d%E2%80%99Ivoire-Validating-the-Living-Income-Benchmark-for-cocoa-growing-regions</a>
Free electricity	CFA9.148	Avg kWh/price = 72,604 CFA ( <a href="https://www.globalpetrolprices.com/Ivory-Coast/electricity_prices/">https://www.globalpetrolprices.com/Ivory-Coast/electricity_prices/</a> ) - avg. consumption is = Avg consumption/capita = 252 kWh Household consumption = 6 pax = 252 x 72,604 = 109.777 CFA/year/household = CFA 9.148/month
Family insurance	CFA15.172	
Pension CNPS	CFA2.772	Employer contribution = 7,7 % - <a href="http://www.cnps.ci/Anglais/employer/social-contributions/Pages/Contribution-rate.aspx">http://www.cnps.ci/Anglais/employer/social-contributions/Pages/Contribution-rate.aspx</a>
Other in-kind benefits		Valuation to be discussed and documented by plantations
Total value of payroll package	CFA92.942	
Payroll package percentage of target	92,94%	
<b>The plantation is paid 92,94 % of the agreed price per metric tons</b>		

**Compliance and development targets:**

The target price of for the payroll package will be assess by a stakeholder consultation every 2 years.

- [www.living-income.com](http://www.living-income.com)
- Plantations with payroll package calculations of “Agricultural workers” which do not reach 50% of target will be excluded from sourcing to SBIOCI.
- Unequal salaries for women will as part of the average calculations result in a lower percentage and thereby lower price at the plantation.

**Documentation:**

- Pay rolls or overview of salaries provided by HR
- Subcontractors functions at the plantation if any

- Annual documented estimate of percentage of activities managed by sub-contractors
- Copy of insurances
- Workers contracts
- Other in-kind documentation

The auditor reviewed the mitigation measure provided by the BP. The Payrolls and the overview of the payrolls was revised together with the calculation tool to define the salary level which is linked to the price paid to the supplier. To calculate the final salary level, the BP collects information about salary (brutto), information if the employee is provided with free housing, electricity and family assurance.

### **2.8.1 The Biomass Producer has implemented appropriate control systems and procedures for verifying that appropriate safeguards are put in place to protect the health and safety of forest workers (CPET S12).**

SBIOCI employ local workers directly, all personal are trained according to health and safety requirements by "Code de travail".

The mitigation measure is 1: A. SBIOCI on boarding training program

Mitigation measures will be implemented on the harvest operation

Regarding A : SBIOCI on-boarding training program

- All personnel is introduced to the company through a onboarding program containing the company policies, including company provisions, (Insurance, food, housing, transport) company expectations, purpose and content of certification, fuel regime, basic HSSE procedures and an overall introduction to daily operations. Employees operating machines or otherwise are engaged in physical operations are either specifically trained on the equipment (e.g. American operator training staff on chipper) or is recruited from operating similar equipment. All employees are individually tested in their functions prior to operation, both in an operational context and HSSE procedures for their specific function. After appropriate training staff is required to sign for reception of information and training. Training is targeted an audience with lack of reading and writing skills. The overall purpose is understanding of certification requirements, adopting a zero incident work environment, smooth daily production a gradual increase in skill level.
  - Training records

The auditor conducted number of interviews with the workers at the plantation to check whether they are provided with OPP, if they use it, what are the working hours and working conditions and if they got a H/S training.

### **2.9.1 Biomass is not sourced from areas that had high carbon stocks in January 2008 and no longer have those high carbon stocks.**

The mitigation measures are divided in 5 groups: A. Contract with seller; B Land title document of supplier; C analysis of historical maps or reports; D. On-site inspection of replanting and expansion areas replanted between 2008 and present day; E consultation with communities.

Mitigation measures will be implemented on the supplier.

Regarding A, Contract with seller:

- In the contract it is stated that: "SELLER guarantees that within their entire company's activities, it is not engaged directly or indirectly in conversion of any forest or protected forest to non-forest, agro-industrial plantations or other purposes" .

- SELLER guarantees, that within their entire company’s activities, it is not directly or indirectly involved in deforestation in rural areas.
- “SELLER will allow, and actively cooperate with, any third-party due diligence activities researching the possible conversion of forest to non-forest, displacement of people or deforestation activities. SELLER guarantees full transparency in respect of any possible stakeholder consultancies.

Regarding B, land title document (Titre foncier / certificat foncier) of the supplier:

- Copy of full land title (Titre foncier / certificat foncier) document for all plantations covered by the supplier’s registration number.
- If changes have been made since 2008, these shall be provided too.
- Other supporting documents

Regarding C: Analysis of historical maps or reports

- On the basis of historical maps or records, data for the following matrix are established:

Plantation #1	Forêt classée (ha)	Bio-diversity area or forest area (ha)	Rubber plantation (ha)	Other area e.g. housing and factory (ha)	Replanted area (ha)	Expansion of plantation (ha)	Total (ha)
Year	(1)	(2)	(3)	(4)	(5)	(6)	(7)
2008							
2015							
Present							

Conclusion from the matrix:

- Any decline in the area of forêt classée (1), biodiversity area or other forest area (2) from 2008 to 2015 to present will lead to exclusion of the supplier.
- An increase in the area “expansion of plantation” shall lead to an investigation if the area was forested in 2008. If the area was forested in 2008 the supplier will be excluded.

Regarding D, on-site inspection of replanted areas (5) and expansion areas (6) from 2008 until present day.

- On-site inspection to be carried out by a forester or biologist
- Compartment register with following info:
  - Compartment no.
  - Size (ha or acre)
  - Year of establishment
  - Comments
- For each compartment the on-site inspection has the purpose of assessing if the compartment by January 2008 was forest, rubber plantation or other (housing, cocoa, oil palm, etc).

Regarding E, consultation with communities surrounding all plantations of the supplier:

- Questionnaire focusing on clarifying if the area of the plantation has expanded since 2008. If the area has expanded then which disputes there has been on registration of land rights, going back to 2008.
- Questionnaire uncovering violation of traditional rights.
- Persons to be interviewed are local Prefects, leaders of woman groups.
- Interview guide and main rules (no manager present, random contact, minimum 3 interviews per community, anonymity)
- If persons interviewed report about disputes, then more people shall be interviewed until a conclusion can be reached and described.
- If the conclusion is that ownership hasn’t been achieved through consensus and transparency, then the plantation will be excluded from sourcing biomass.

- If violation of traditional rights take place, then biomass cannot be sourced from the plantation before documented consensus has been achieved and a follow up program has been put in place.
- If there are ongoing land conflict issues, then biomass cannot be sourced from the plantation before the conflicts have been settled through consensus and transparency
- SBIOCI can choose (not compulsory) to investigate if a finding about disputes from the communities is supported by local courts.
- Questionnaires to be saved for 5 years.

Conversion of rubber plantations or compartments to urban development projects will be assessed by:

- Officially approved permissions and accordance with legislation
- Justification: in which way will the conversion of the rubber plantation help communities or environment
- Due Diligence that the rubber plantation does not originate from converted forest procedure A to E above.

The auditor reviewed the contract with the first plantations (supplier, historical maps were reviewed together with the BP, and the land title document was seen as well. Finally, the interviews with the communities were conducted.

### **2.9.2 Analysis demonstrates that feedstock harvesting does not diminish the capability of the forest to act as an effective sink or store of carbon over the long term.**

The mitigation measures are divided in 3:

- A. Contract with seller;
- B. Preharvest meeting;
- C. Post-harvest control.

Mitigation measures will be implemented on the plantation.

Regarding A, contract with seller

- SELLER guarantees, that roots not extracted are not burned but left to rot and decay.

Regarding B, preharvest meeting

- Pre-harvest meeting, training to leave the roots in the plantation
- Signed instruction document

Regarding C, post-harvest control

- On-site inspection, confirming that roots are left in piles covered with a minor layer of soil.
- Signed report

The auditor visited the harvesting operation (actual and the plantation as well) to verify that part of the biomass is left onsite, specifically roots and part of the branches. The interview with the workers onsite revealed that they are aware that the roots must be left aside.

## 10 Non-conformities and observations

Identify all non-conformities and observations raised/closed during the evaluation (a tabular format below may be used here). Please use as many copies of the table as needed. For each, give details to include at least the following:

- applicable requirement(s)
- grading of the non-conformity (major or minor) or observation with supporting rationale
- timeframe for resolution of the non-conformity
- a statement as to whether the non-conformity is likely to impact upon the integrity of the affected SBP-certified products and the credibility of the SBP trademarks.

### Open Non-Conformity Reports (NCRs)

<b>NCR number:</b> 44593 NCR 01/20	<b>NC grading:</b>	Major <input type="checkbox"/>	Minor <input checked="" type="checkbox"/>
<b>Standard &amp; Requirement:</b>	Standard #1 V1.0 - Feedstock Compliance Standard - 2.1.3		
<b>Description of Non-conformance:</b>			
<p>The BP has presented description of the mitigation measure (for verifying that feedstock is not sourced from forests converted to production plantation forest or non-forest lands after January 2008) which specifies that “On the basis of historical maps or records, data for the following matrix are established” and mentioned the details of data which shall be gathered, but it does not specify where to gather the data for it to be considered credible. Additionally, the BP has stated that based on online maps, it was clear that there was a plantation before 2008. However, the maps were reviewed during the audit and it was not clear from the data if there was a plantation or not, as part of the plantation site was very fragmented on the satellite images. According the procedure, the BP should not conclude low risk and should go and verify the locations onsite. Finally, the procedure is not clear if points A, B, C, D and E shall be done each time or not.</p> <p>The NCR is considered as minor due to the fact that the BP has not stopped after checking the online maps, but checked the sites onsite and verified the information during the communication with the local communities. Therefore, the issue is not the robustness of the verification, but rather the description of the mitigation process in the procedures.</p>			
<b>Corrective action request:</b>	<p>Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.</p> <p>Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.</p>		

<b>NCR conformance deadline:</b>	By next audit, but not later than 12 months after report finalisation date
<b>Client evidence:</b>	
<b>Evaluation of Evidence:</b>	
<b>NCR Status:</b>	<b>Open</b>
<b>Comments (optional):</b>	

## Closed Non-Conformity Reports (NCRs)

<b>NCR number:</b> 44617 NCR 02/20	<b>NC grading:</b>	<b>Major</b> <input checked="" type="checkbox"/>	<b>Minor</b> <input type="checkbox"/>
<b>Standard &amp; Requirement:</b>	Standard #1 V1.0 - Feedstock Compliance Standard - 2.7.1		
<b>Description of Non-conformance:</b>			
<p>Specified risk was designated for this indicator and it was well justified by the organization in the risk assessment. The audit team reviewed the risk assessment and concluded that the risk is well justified. Mitigation measure was also described for this indicator and the defined system is considered strong enough.</p> <p>However, during the onsite verification of the mitigation measure, it was revealed that out of 40 interviews done, 12 were done with the sub-contractor employees. While no direct employee from the plantation complained about the possibility to join the unions, 4 out of 12 employees from the unions were complaining about this issue. The BP decided to follow up on this issue with the employees and organized a meeting between all the employees the responsible personnel from the plantation in order to investigate this issue (held on 7th February 2020). Additionally, both sub-contractors were contacted to discuss the issue. The result of the BP after the meeting with 75 employees and responsible person from the plantation was that “The conclusion is that the statements given in the previous report can be partially true but not necessarily comprehensive. ... The meeting however did raise the potential issues and the subcontracted was directly ordered to fix any issues that he might have”. The auditor conducted an interview during the assessment with worker from the same sub-contractors and following issues were revealed:</p> <ol style="list-style-type: none"> <li>1) The workers are not allowed to join the unions under a threat of losing their job</li> <li>2) The vacations are not paid and in case longer time off the work is taken (even agreed with the employer) the person might lose their job</li> <li>3) There were cases where the workers had been fired from their work without getting paid</li> <li>4) The OOP (rubber boots) were not provided by the employer but had to be purchased by the employee</li> <li>5) The was paid around between CFA20.000 and CFA100.000 per week depending on the production. The minimum income in the country is CFA36.000. No free housing and health insurance is provided. This means that in some months, the employees are not paid the minimum salary defined by local law.</li> </ol> <p>The BP did not clearly state that the plantation would be excluded from the SBE. Actually, there is no list with a date when the plantation was accepted in SBE. Even though there is no evidence that the BP would start sourcing this material as SBP compliant before sorting out these issues, based on the meeting minutes with conclusion leading to a conclusion that the issue is solved as the sub-contractor was ordered to address it. However, based on the the interview with the worker during the assessment which took place after the BP meeting with the workers, it is concluded that these issues were not yet solved by the BP.</p>			

<b>Corrective action request:</b>	Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.
<b>NCR conformance deadline:</b>	Before issue/reissue of certificate
<b>Client evidence:</b>	<ul style="list-style-type: none"> <li>- New safe and functional chainsaws have been provided by SBIOCI to forest workers.</li> <li>- SBIOCI has provided permanent contract to workers who have been organized in 2 shifts. Each shift is composed of 2 workers. The first shift is working from 6 am to 2 pm, and the second shift from 2 pm to 10 pm with one weekly day off. They receive decent gross salary with an additional transportation allowance.</li> </ul>
<b>Evaluation of Evidence:</b>	The auditor conducted interview with 3/4 of the workers and the interview confirmed that the workers were provided by brand new chainsaws, the working hours were reduced (2 shifts instead of one long). Workers interviewed confirmed they have one full meal served, potable and mineral water is provided freely on daily basis at the workplace.
<b>NCR Status:</b>	<b>Closed</b>
<b>Comments (optional):</b>	

<b>NCR number:</b> 44618 NCR 03/20	<b>NC grading:</b>	<b>Major</b> <input checked="" type="checkbox"/>	<b>Minor</b> <input type="checkbox"/>
<b>Standard &amp; Requirement:</b>	Standard #1 V1.0 - Feedstock Compliance Standard - 2.7.4		
<b>Description of Non-conformance:</b>			
<p>Specified risk was designated for fair payment and employment conditions and it was well justified by the organization in the risk assessment. The audit team reviewed the risk assessment and concluded that the risk is well justified.</p> <p>The auditor reviewed the described mitigation measure provided by the BP. The Payrolls and the overview of the payrolls was revised. However, the methodology of the BP does not mitigate the risk, but only punishes the plantation for paying less salary to certain (group of) workers. The mitigation measure does not provide information on how the discrimination is investigated and identified, and how (if found) it is eliminated.</p>			
<b>Corrective action request:</b>	Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.		
<b>NCR conformance deadline:</b>	Before issue/reissue of certificate		
<b>Client evidence:</b>	The BP has updated the risk assessment and the mitigation measure respectively with the following statement: If salary bulletins are unavailable, then salary information will be collected by interviews: "Comparison of minimum 5 pays slips from woman with 5 pays slips from men, with same experience and function. If		

	<p>a significant difference is found between the average of men and women the plantation will be asked why this is the case."</p> <p>SBIOCI will also provide examples of best practices for working with equal rights between men and woman</p>
<b>Evaluation of Evidence:</b>	The updated risk assessment version was reviewed by the auditor and it was concluded that the approach taken by the BP will provide credible data which could be evaluated and lead to appropriate results of the mitigation measure. The BP will be able to evaluate the possible discrimination and take appropriate steps in case it turned out that it is happening.
<b>NCR Status:</b>	<b>Closed</b>
<b>Comments (optional):</b>	

<b>NCR number:</b> 44619 NCR 04/20	<b>NC grading:</b>	<b>Major</b> <input checked="" type="checkbox"/>	<b>Minor</b> <input type="checkbox"/>
<b>Standard &amp; Requirement:</b>	Standard #1 V1.0 - Feedstock Compliance Standard - 2.7.5		
<b>Description of Non-conformance:</b>			
<p>Specified risk was designated for this indicator and it was well justified by the organization in the risk assessment. The audit team reviewed the risk assessment and concluded that the risk is well justified.</p> <p>The auditor reviewed the mitigation measure provided by the BP. The Payrolls and the overview of the payrolls was revised together with the calculation tool to define the salary level which is linked to the price paid to the supplier. To calculate the final salary level, the BP collects information about salary (brutto), information if the employee is provided with free housing, electricity and family assurance. However, this information is not mentioned in the payrolls and therefore the system of information collection from payrolls is not effective. Additionally, the salaries of the sub-contractor workers, which are significantly lower compared to directly employed workers, were not included in the calculation and were not yet collected at the time of the assessment.</p>			
<b>Corrective action request:</b>	<p>Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.</p> <p>Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.</p>		
<b>NCR conformance deadline:</b>	Before issue/reissue of certificate		
<b>Client evidence:</b>	<p>The BP has updated the risk assessment and the mitigation measure respectively with the following statement If salary bulletins are unavailable then salary information will be collected by interviews: "If information regarding salary components like free housing, free electricity and other is not available, information shall be collected either by interviewing plantation management or employees".</p>		
<b>Evaluation of Evidence:</b>	<p>The updated risk assessment version was reviewed by the auditor and it was concluded that the approach taken by the BP will provide credible data which could be evaluated and lead to appropriate results of the mitigation measure. The BP will one</p>		



	way or another receive complex data about all the benefits received by the workers and will be able to evaluate if the conditions are fair or not. As for the sub-contracted workers, the same conditions will apply.
<b>NCR Status:</b>	<b>Closed</b>
<b>Comments (optional):</b>	

<b>NCR number:</b> 44620 NCR 05/20	<b>NC grading:</b>	<b>Major</b> <input checked="" type="checkbox"/>	<b>Minor</b> <input type="checkbox"/>
<b>Standard &amp; Requirement:</b>	Standard #1 V1.0 - Feedstock Compliance Standard - 2.8.1		
<b>Description of Non-conformance:</b>			
<p>Specified risk was designated for this indicator and it was well justified by the organization in the risk assessment. The audit team reviewed the risk assessment and concluded that the risk is well justified. Mitigation measure was also described for this indicator and the defined system is considered strong enough.</p> <p>However, during the onsite verification of the mitigation measure, the auditor conducted number of interviews with the workers at the plantation to check whether they are provided with OPP, if they use it, what are the working hours and working conditions and if they had received H/S training. While it revealed that that the conditions for the direct employees of the BP are in compliance with the H/S requirements, the conditions for employees contracted through the sub-contractor were not:</p> <ol style="list-style-type: none"> <li>1) The chainsaws used by the employees where not in good conditions (missing chainstopper, missing motor cover). These chainsaws were rented by the BP and provided to the workers by the sub-contractor</li> <li>2) The working hours recently increased from 12 to 15 hours per day and the workers were working 6 or 7 days a week.</li> <li>3) Based on the interviews with the workers and photos provided by the BP, they were provided with H/S training, but there is no record about this training kept by the BP</li> </ol>			
<b>Corrective action request:</b>	Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.		
<b>NCR conformance deadline:</b>	Before issue/reissue of certificate		
<b>Client evidence:</b>	<ul style="list-style-type: none"> <li>- New safe and functional chainsaws have been provided by SBIOCI to forest workers.</li> <li>- SBIOCI has provided permanent contract to workers who have been organized in 2 shifts. Each shift is composed of 2 workers. The first shift is working from 6 am to 2 pm, and the second shift from 2 pm to 10 pm with one weekly day off. They receive decent gross salary with an additional transportation allowance.</li> </ul>		
<b>Evaluation of Evidence:</b>	The auditor conducted interview with 3/4 of the workers and the interview confirmed that the workers were provided by brand new chainsaws, the working hours were reduced (2 shifts instead of one long). Workers interviewed confirmed they have one full meal served, potable and mineral water is provided freely on daily basis at the workplace.		

<b>NCR Status:</b>	<b>Closed</b>
<b>Comments (optional):</b>	

## Observations

<b>OBS number: 44592 OBS 01/20</b>	<b>Standard &amp; Requirement:</b>	Standard #1 V1.0 - Feedstock Compliance Standard - 1.2.1
<b>Description of findings leading to observation:</b>	<p>Specified risk was designated for this indicator, and it was well justified by the organization in the risk assessment. The mitigation measure described by the organization included number of steps to be implemented.</p> <p>The organization has gathered the data from the supplier and has a contract, which allows them to check the legality of ownership and land rights. "Titre foncier" is an official document providing the BP with evidence that the plantation has the rights to manage the land. However, there is no map on this official document and therefore it is sometimes difficult to link the area with the exact site. Considering the fact that the BP has presented map of the plantation and has a GPS coordinates of the plantation, there is enough evidence to link the official document to the area in this case, but the description of the mitigation measure is not complete and this might be potentially become a problem in the case of some other suppliers.</p>	
<b>Observation:</b>	The BP should assure that the conclusion is taken based on credible data and clear evidence otherwise precautionary approach is applied.	
<b>OBS number: 44616 OBS 02/20</b>	<b>Standard &amp; Requirement:</b>	Standard #1 V1.0 - Feedstock Compliance Standard - 2.5.1
<b>Description of findings leading to observation:</b>	<p>Specified risk was designated for indicator dealing with traditional, customary and tenure rights and it was well justified by the organization in the risk assessment. Mitigation measures were provided for this indicator. However, the situation where a supplier is owning more than one plantation (especially when not all are included in the SBE) is not explicitly covered by the point C - consultation with the communities. Also, the mitigation measure description is missing definition of the sampling rate to be applied.</p>	
<b>Observation:</b>	The BP should make sure that when evaluating plantation from which material is not sourced (for the high-profile indicators) the same rules apply as for the plantation where the material is sourced from.	

<p><b>OBS number: 44621</b> <b>OBS 03/20</b></p>	<p><b>Standard &amp; Requirement:</b></p>	<p>Standard #2 V1.0 - Verification of SBP-compliant feedstock - 12.1</p>
<p><b>Description of findings leading to observation:</b></p>	<p>The relevant personnel were interviewed during the assessment and was also witnessed during number of interviews with workers and local communities. All required knowledge is present within the team and it is ensured that the personnel is competent to conduct all task. Considering the fact that interview with local communities are essential element of number of mitigation measures, it would however help if Ms. Toure is provided with some external training (e.g. SAN Farm or similar) to improve her interviewing skills.</p>	
<p><b>Observation:</b></p>	<p>The BP should assure that the responsible person is provided with high quality training to make sure that the interviewing skills are as good as possible.</p>	

## 11 Certification decision

<b>Based on the auditor's recommendation and the Certification Body's quality review, the following certification decision is taken:</b>	
<b>Certification decision:</b>	Certification approved
<b>Certification decision by (name of the person):</b>	Christian Rahbek
<b>Date of decision:</b>	02/Apr/2020
<b>Other comments:</b>	<i>Click or tap here to enter text.</i>