

Supply Base Report: Societe Bioenergies Côte d'Ivoire Sarl

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Completed in accordance with the Supply Base Report Template Version 1.3

For further information on the SBP Framework and to view the full set of documentation see www.sbp-cert.org

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1 Overview

Producer name: Societe Bioenergies Côte d'Ivoire Sarl
Producer location: Riviera Golf, Lot 39, Ilot 3, Sect. BP, Rue carrefour Mel Théodore 06 BP 828 ABJ 06
Geographic position: 5.329871; -3.978602
Primary contact: Bo Christensen, Riviera Golf, Lot 39, Ilot 3, Sect. BP, Rue carrefour Mel Théodore 06 BP 828 ABJ 06, ph.: +45 5271 5271 / +225 0703 4848, e-mail: bc@sbioci.com
Company website: www.sbioci.com (under construction)
Date report finalised: 20/Feb/2020
Close of last CB audit: 14/Feb/2020
Name of CB: NEPCon
Translations from English: Yes
SBP Standard(s) used: Standard 1 version 1.0, Standard 2 version 1.0, Standard 4 version 1.0, Standard 5 version 1.0
Weblink to Standard(s) used: <https://sbp-cert.org/documents/standards-documents/standards>
SBP Endorsed Regional Risk Assessment: not applicable
Weblink to SBE on Company website: <https://www.sbioci.com/certification>

Indicate how the current evaluation fits within the cycle of Supply Base Evaluations				
Main (Initial) Evaluation	First Surveillance	Second Surveillance	Third Surveillance	Fourth Surveillance
X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2 Description of the Supply Base

2.1 General description

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. Feedstock is primary and consist of rubber stems and branches which are clear-cut as they no longer produce rubber sap(latex). The supply chain for SBIOCI is that logs originating from aged and non-productive rubberwood compartments designated for replanting are extracted and chipped at a central 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 CIF.

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 low risk, will be categorized as SBP-compliant biomass. All other biomass will be physically separated and handled as controversial biomass.

The country of origin for SBIOCI feedstock is Côte d'Ivoire. In Côte d'Ivoire the districts of origin are Montagnes, Sassandra-Marahoué, Bas-Sassandra, Goh-Djiboua, Lagunes, Abidjan and Comoé.

The following specie is used as feedstock: Rubberwood, *Hevea brasiliensis*

2.1.1 Supply base Côte d'Ivoire

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.

Côte d'Ivoire - geographical location and capital

Côte d'Ivoire (Ivory Coast) is a country located on the south coast of West Africa with an area of 322,460 km². Côte d'Ivoire's political capital is Yamoussoukro in the centre of the country, while its economic and largest city is the port city of Abidjan.



Figure 1: Map with neighbouring countries and major cities in Côte d'Ivoire

Côte d'Ivoire has since 2011 been divided into 14 districts of which two are cities organised as autonomous districts.



Figure 2: Districts in Côte d'Ivoire

The 12 non-autonomous districts are subdivided into 31 regions¹

The supply base covers the following districts:

- Montagnes, 31,050 km²
- Sassandra-Marahoué, 23,940 km²
- Bas-Sassandra, 25,800 km²
- Goh-Djiboua, 17,580 km²
- Lagunes, 23,280 km²
- Abidjan: 2,119 km²
- Comoé 14,173

Total area of supply base: 137,942 km²

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)².

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

- 10.4 million hectares 2010 (Food and Agriculture Organization, 2019)³
- 3.4 million hectares 2015 (REDD+, 2017)⁴

¹ <https://www.ardci-rd.org/>

² 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

³ <http://www.fao.org/countryprofiles/index/en/?iso3=CIV> Accessed 09 July 2019

⁴ FAO et SEPREDD+, (2017): *Données Forestières de base pour la REDD+ en Côte d'Ivoire. Cartographie de la dynamique forestière de 1986 à 2015*

- App 3 million hectare, 2013 (FLEGT, 2013)⁵

The Food and Agriculture Organization (FAO) provides a systematic evaluation of forest resources in a large number of countries (233 in the 2010 evaluation); however, the REDD+ analysis is based on mapping by images and classification of forest and non-forest areas, as follows:

- **Forest:** dense rain forest (evergreen and semi-deciduous), dense mountain forest, dry dense forest, clear forest, forest on hydromorphic soil (Swamp forest), gallery forest, mangrove forest (Mangrove), reforestation.
- **Non-forest:** woodland forest Savanna, savannah with trees, shrub savanna, grassland savanna / meadow, forest culture, savannah culture, lowland culture, agro-industrial plantation, other cultures, fallow, clearing / bare soil, inhabited site / bare ground (village-village-camp), cutting area (road / bare ground / grounding), body of water (water reservoir-ocean-lagoon-river-surface water), rock, hill, flood area / Swamp.

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 savannahs, 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.

⁵ <http://www.euflegt.efi.int/cote-ivoire> Accessed 09 July 2019

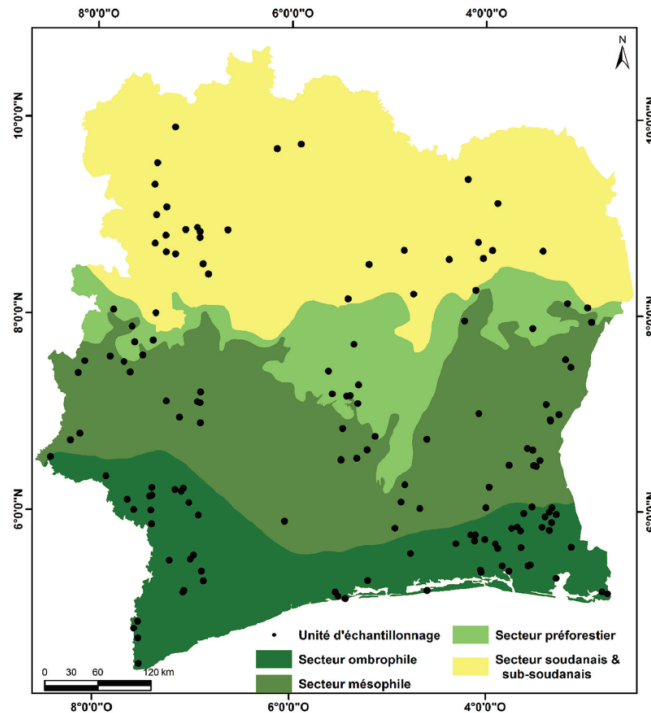


Figure 3: Four main phytogeographic zones REDD+ (2017)

Up to 75 % of the land in the country is arable (Republic of Côte d'Ivoire MARA, MEF, and MESRS, 1999)⁶.

Rubberwood is considered an agro-industrial product by the National Centre of Agricultural Research and REDD+ (2017) consider agro-industrial plantations as non-forest⁷

REDD+⁸

Côte d'Ivoire committed itself to the international REDD+ mechanism in 2011 in order to contribute to the global fight against climate change and to restore its plant cover strongly degraded. This commitment was reaffirmed at the highest State summit in 2012 through the Decree No. 2012-1049 of 24 October 2012 relating to the establishment, organization and functioning of the National REDD+ commission. The objective of the Ivorian Government is to achieve a rate of plant cover of at least 20% of the national territory by 2030. This ambition is supported by a strong political will of the President of the Republic through his various speeches at the United Nations Assemblies on climate change. Therefore, initiatives such as the Code of the Forest (forest law), the orientation law on sustainable development, the orientation law for agriculture, and the New York Declaration on forests have been taken.

In the framework of its commitment, the Government of Côte d'Ivoire has developed the REDD+ National Strategy with all the stakeholders. It is aligned with the international requirements defined by the United Nations Framework Convention on Climate Change (UNFCCC). With its systemic vision, this strategy commits all countries in a transformational approach through an integrated approach, which combines

⁶ Republic of Côte d'Ivoire Ministry of Agriculture and Animal Resources, Ministry of the Environment and Forests, and Ministry of Higher Education and Scientific Research (1999). *Ivorian Agriculture at the Dawn of the Twentieth Century* (in French). Available from http://www.hubrural.org/IMG/pdf/cote_ivoire_agriculture_21e_siecle.pdf.

⁷ FAO et SEPREDD+, (2017): Données Forestières de base pour la REDD+ en Côte d'Ivoire. Cartographie de la dynamique forestière de 1986 à 2015

⁸ REDD+ Côte d'Ivoire National Strategy

economic development, social welfare and preservation of natural resources. The development of National REDD+ Strategy marks an important step in the management of the natural resources of the Côte d'Ivoire.

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 2014⁹.

Figure 4 shows the change in area of forest from 1986 to 2015.

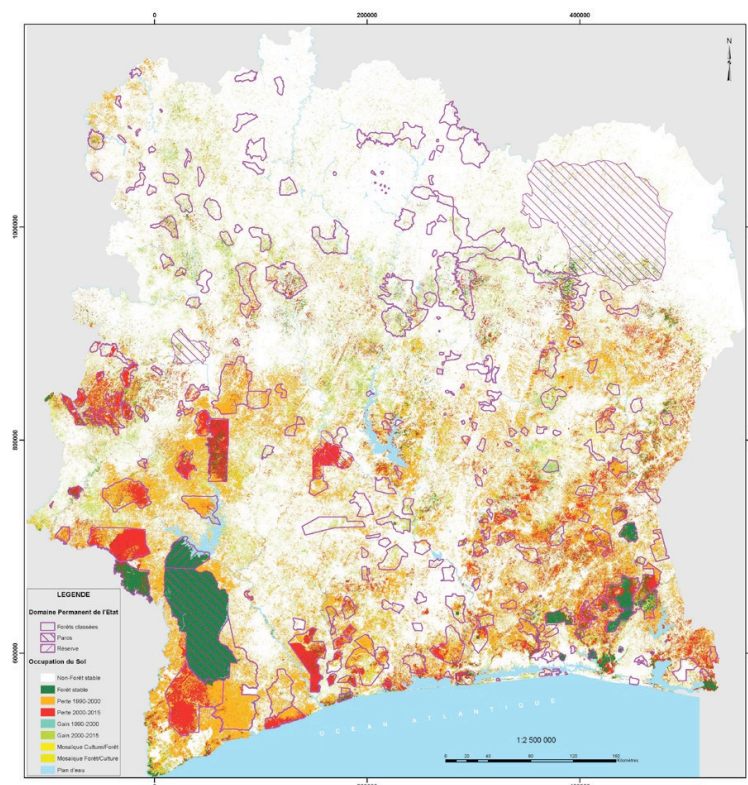


Figure 4: Change in area of forest from 1986-2015 (FAO et SEPREDD+, 2017)¹⁰

⁹ Forest Carbon Partnership Facility (FCPF), Carbon fund. Emission Reduction Program Document (ER-PD) for Tai National Park, Republic of Côte d'Ivoire. World Bank 2019.

¹⁰ FAO et SEPREDD+, (2017): Données Forestières de base pour la REDD+ en Côte d'Ivoire. Cartographie de la dynamique forestière de 1986 à 2015

Analysis of causes for deforestation can be divided into direct and indirect drivers. Direct drivers identified by the Ministry of Water and Forest of Côte d'Ivoire are presented in the list below. As it can be seen in the list 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 agriculture¹¹.

One reference postulate that at the national level, it should be emphasized that the conversion of natural forest to rubberwood plantation is overrepresented as regards its responsibility for deforestation. The clearings of mature forest linked to this crop seem indeed to be very minor compared to the renewal of fallow land and old coffee/cocoa plantations as confirmed by various studies¹²

REDD+ (2017)¹³ cite the most important direct drivers of deforestation and forest degradation as:

- the expansion of agriculture especially for the establishment of cash crops (cocoa, rubber, oil palm) and itinerant food crops (rice, yam);
- the exploitation of wood energy;
- uncontrolled land use beyond their regenerative capacity;
- and uncontrolled bush fires.

Indirect drivers of deforestation and forest degradation are:

- weak governance;
- the lack of coordination between forest policy and other sectoral land use policies;
- the lack of land tenure security and demographic pressure (migration and growth);
- as well as the socio-political crises and the political instability of 2002 and 2010.

Recently (August 2019) l'Assemblée des Regions et Districts de Côte d'Ivoire (ARDCI) has developed a database with land-use maps with the purpose of managing land use areas. The database forms a central part of the country's policy and cooperation with REDD+ towards regaining a 20% forest cover by 2030¹⁴.

The issue of historic conversion of forest to e.g. agriculture or agro-industrial plantations of rubberwood, is central in order to assess if a rubberwood plantation, being industrial or owned by small scale producers (out growers) potentially can be classified as sustainable and the feedstock can be classified as SBP-compliant. FSC general principle is that management Units, containing plantations, that were established on areas converted from natural forest after November 1994 shall not qualify for certification, except where:

- a) Clear and sufficient evidence is provided that The Organization was not directly or indirectly responsible for the conversion, or
- b) The conversion affected a very limited portion of the area of the Management Unit and is producing clear, substantial, additional, secure long-term conservation benefits in the Management Unit. ¹⁵

¹¹ 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

¹² 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

¹³ REDD+ (2017) : Données Forestières de Base Pour La REDD+ en Côte d'Ivoire – Inventaire de la biomasse forestière pour l'estimation des facteurs d'émission. L'organisation des Nations Unies pour l'alimentation et l'agriculture, Abidjan 2017

¹⁴ <http://www.linfordrome.com/economie/50076-occupation-des-sols-en-cote-d-ivoire-la-nouvelle-carte-remise-aux-regions-et-filieres-agricoles>

¹⁵ FSC-STD-60-004 V2-0 EN

For SBP the issue of historic conversion is centred on January 2008. Management Units, containing plantations or non-forest lands, that were established on areas converted from natural forest after January 2008 shall not qualify for certification.

Cocoa and Forest Initiative¹⁶.

Realizing that continued deforestation will lead to total disappearance of natural forest and that cocoa production is and has been one of the leading causes for deforestation, the cocoa industry in 2017 launched the Cocoa and Forest Initiative. The government of Côte d'Ivoire together with the cocoa industry, being one of the main actors in deforestation, engaged and committed itself to the initiative with the following main objectives, in Côte d'Ivoire:

- 1) Support the Governments objective of achieving 20 % forest cover by 2030;
- 2) Sustainable cocoa production and farmer´s livelihoods and
- 3) Community engagement and social inclusion

Direct objective:

- 1) New forest code by 2019,
- 2) National Forest Preservation and Rehabilitation Fund,
- 3) National cocoa traceability system etc.

Area of implementation are the largest remaining forests: Guérmon, Cavally, Nawa, San-Pedro and Le-Me.

Participants: Ministère d'Eaux et Forêts CVI; World Cocoa Foundation; The Sustainable Trade Initiative

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.

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.

¹⁶ Implementation Plan for the Joint Framework of Action 2018-2020. Republic of Côte d'Ivoire.

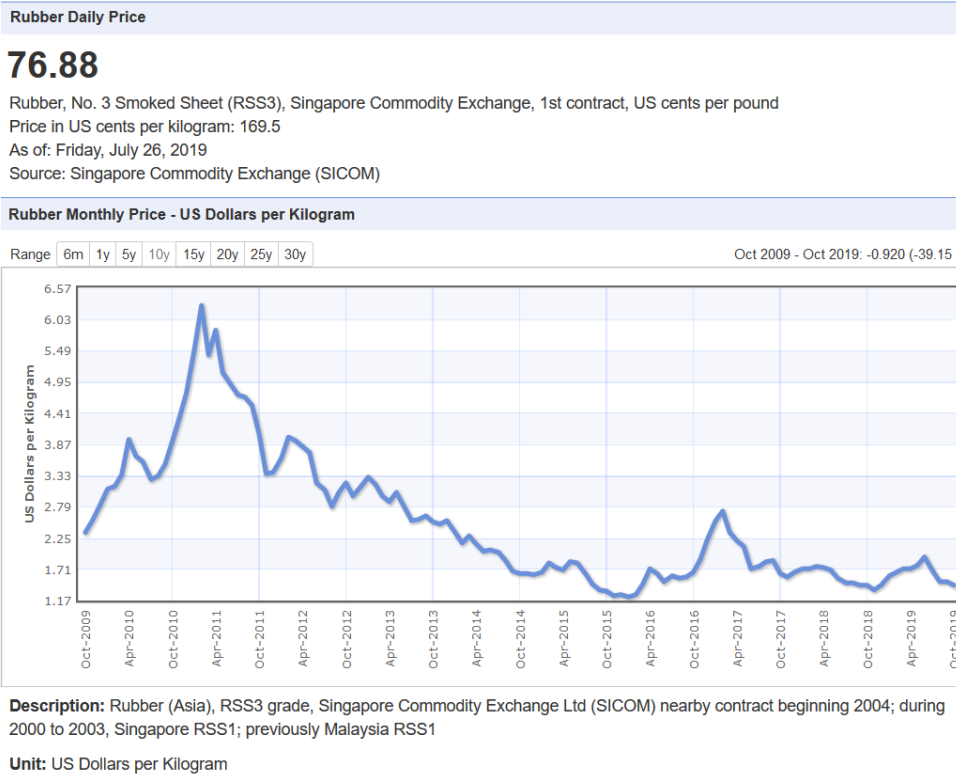


Figure 5: World market prices on latex from 2009 to 2019

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 areas¹⁷.

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 FAO¹⁸.

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

¹⁷ <http://www.commodafrica.com/23-10-2018-irc-2018-la-production-de-caoutchouc-en-cote-divoire-triplera-dici-2023-2-mt>

¹⁸ <http://www.fao.org/faostat/en/#data/QC>

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

Today large industries including SIPH, “Société Africaine de Plantations d’Hévéas” (SAPH), “Tropical Rubber Côte d’Ivoire” (TRCI), “Société des caoutchoucs de Grand-Béréby” (SoGB) are dominant in the production of the natural latex. The three largest industrial rubber production companies in Côte d’Ivoire have the following production areas and certifications:

Company	Industrial plantations (hectare)	Small scale village plantations (hectare)	Certifications	Deforestation approach
SAPH ¹⁹	23.025	225.085	Internal Sustainable development program; Sustainable Natural Rubber Initiative ²⁰	Zero-deforestation approach. REDD+ involvement
SoGB ²¹	34.000	?	ISO 9001, ISO 14001, OHSAS 18001, RSPO	
TRCI ²²	1415	? 20.000 small scale producers	ISO 9001	

In addition to the three mentioned above, SBIOCI have contact to EXAT²³, they have about 1000 hectare of rubberwood plantation and replant about 50 hectare per year.

¹⁹ <https://www.groupesifca.com/saph.php>

²⁰ http://www.snr-i.org/Voluntary%20Guidelines%20and%20Criteria%20Version%201_5_1.htm

²¹ <https://www.socfin.com/en/locations/sogb>

²² <https://www.tropical-rubber.ci/>

²³ <http://www.africinvest.com/portfolio/company/agriculture/exat/> or <http://business.abidjan.net/AL/annonce.asp?id=9913>

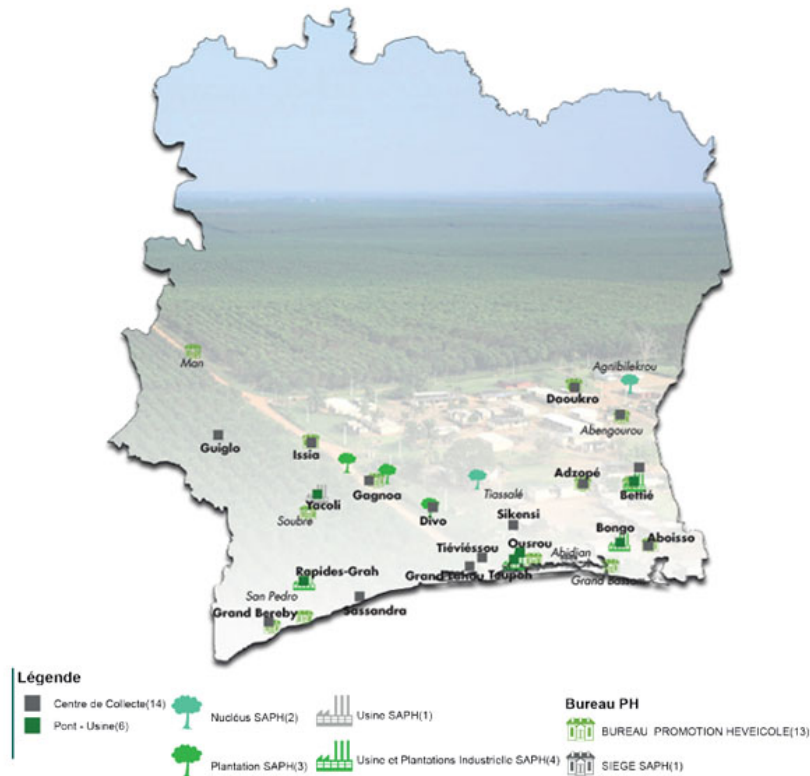


Figure 6: SAPH production sites

It is estimated that about 15 % of production is large scale agro-industrial plantations, while 85 % is by small scale outgrowers.

APROMAC (The Association of Natural Rubber Professionals of Côte d'Ivoire) is a not-for-profit organisation with the objective of organising, protecting and developing the natural rubber industry in Côte d'Ivoire. It has put in place a mechanism to fix buying prices for natural rubber growers, created new processing units and set up natural rubber plant development funds (FDH). APROMAC promotes the development of plantations and trains growers. In 2019, APROMAC recorded 159,000 smallholders who usually manage farms ranging from 1 to 15 ha²⁴. They are represented by various associations and organized into geographical sectors of 5,000 to 10,000 farmers. They benefit from extensive training provided by APROMAC approved extension workers at a ratio of one extension worker to 300 farmers.

In figure 7 below APROMAC's predictions on hundreds of thousands of hectares is presented and in figure 8 the rubber production zones in Côte d'Ivoire are presented.

²⁴ <http://apromac.ci/>

Evolution de la Production Nationale

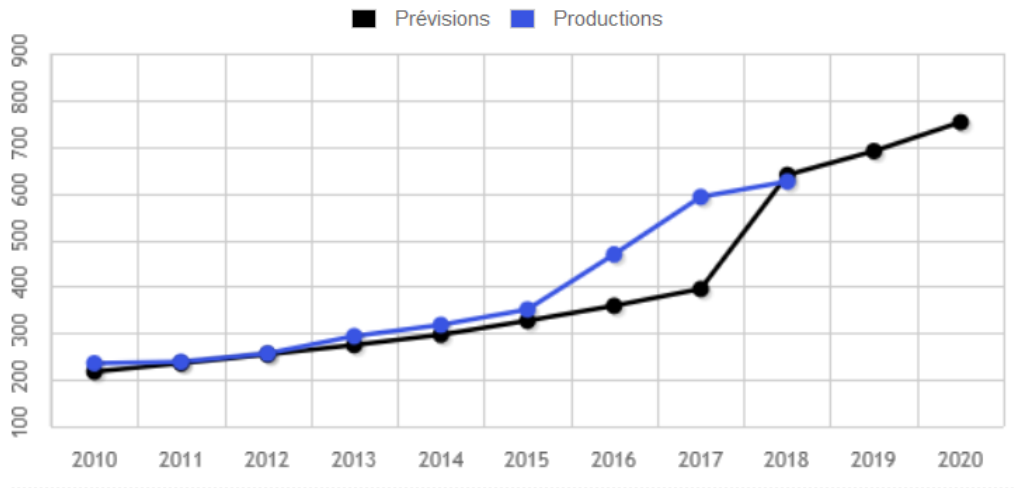


Figure 7 Rubber production, forecast and realized (APROMAC, 2019)

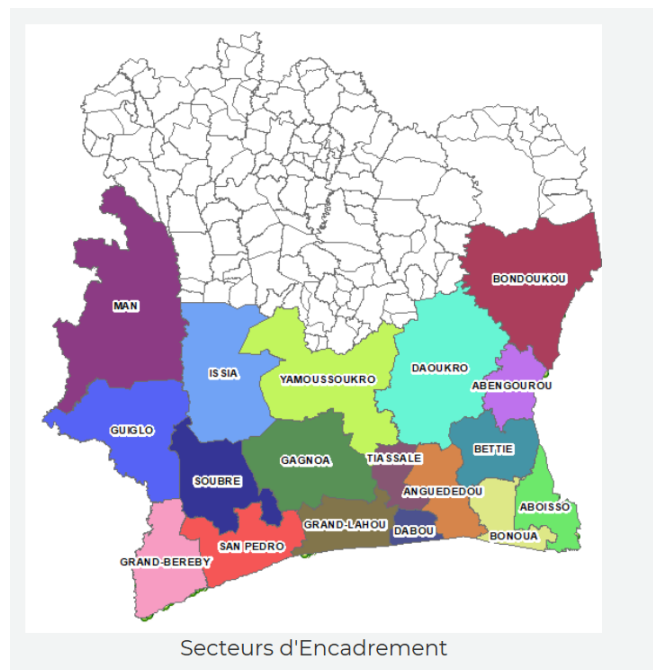


Figure 8: Rubber production zones (APROMAC, 2019)

GPSNR (Global Platform for Sustainable Natural Rubber) is an international, multistakeholder, voluntary membership organization, with a mission to lead improvements in the socioeconomic and environmental performance of the natural rubber value chain. GPSNR is governed 30 % by civil society; 30 % by growers, processors and traders; 10 % by car makers and other users; 30 % by tire and other rubber makers. GPSNR have a range of members, amongst others: FSC, PEFC; NEPCon, Halcyon (TRCI), SOCFIN (SOGB), SIPH (SIFCA) etc.

GPSNR launched its sustainability programme by establishing a working group at its AGM in March 2019. Since then, the Strategy and Objectives Working Group has continued to build out the scope and desired deliverables for the first 3 strategies that GPSNR should implement, namely: 1) Natural Rubber Sustainability Policy Toolbox and Best Practices Guidance; 2) Capacity Building for Smallholders and Rubber Plantations supplying Natural Rubber; 3) Improving Transparency and Traceability within the Natural Rubber Supply Chain.

Strategy 1, “Sustainability Policy Toolbox and Best Practices Guidance”, has by August 2019 been finalized within the Strategy and Objectives Working Group members. The estimated timeline for the completion of this work has been laid out to ensure that the final approval by the Executive Committee is granted in time, and the deliverables of this strategy can be put forward for consideration by the General Assembly in March 2020.

In order to develop its guideline to companies / “best practices guidance, GPSNR is relying on existing tools such as the “Accountability Framework Initiative:²⁵ <https://accountability-framework.org/>

SPOTT – ESG risk assessment of rubber producers and processors.

Natural rubber producers and traders are being assessed by SPOTT. SPOTT supports constructive industry engagement by investors, ESG (Environment, Social and Governance) analysts, buyers and other supply chain stakeholders – those with the power to influence companies to increase disclosures and improve their practices on the ground.

Users of SPOTT can identify areas where a company is making continuous improvement and other areas where engagement may be needed. SPOTT indicators and assessment data can inform policies and procedures for due diligence, screening and sourcing.

SPOTT use 120 indicators²⁶ and have assessed 15 multiple natural rubber producers and processors²⁷. Each of the companies score in relation to ESG (Environment, Social and Governance) risks are presented in the figure below.

²⁵ Interview with Director of GPSNR Stefano Savi on October 1st 2019.

²⁶ <https://www.spott.org/wp-content/uploads/sites/3/2019/11/SPOTT-Natural-rubber-scoring-criteria-2019.pdf>

²⁷ <https://www.spott.org/natural-rubber/>

Add filter(s) Disclosure types: Organisation Policy Practice ? Show overview ▾

Company	Rank	Score	Change	Disclosure	Supply chain segments	Headquarters	Landbank	Market cap
Sampoerna Agro	1	72%	n/a		Producer	Indonesia	100.0 KHa	\$295.1M
Halcyon Agri	2	69.6%	n/a		Producer, processor, trader	Singapore	111.6 KHa	\$540.8M
Socfin	3	67%	n/a		Producer, processor	Luxembourg	387.9 KHa	\$415.7M
Siat Group	4	57.2%	n/a		Producer, processor	Belgium	222.2 KHa	Private co.
Royal Lestari Utama	5	50%	n/a		Producer, processor	Indonesia	88.8 KHa	Private co.
Bridgestone	6	47.1%	n/a		Producer, processor, trader	Japan	48.2 KHa	\$32,225.2M
Société Internationale de Pla...	7	38.7%	n/a		Producer, processor, trader	France	60.4 KHa	\$482.3M
Bakrie Sumatera	8	28.2%	n/a		Producer, processor	Indonesia	19.8 KHa	\$16.6M
Vietnam Rubber Group (VRG)	9	24%	n/a		Producer, processor, trader	Vietnam	408.0 KHa	Private co.
Kirana Megatara	10	21.5%	n/a		Producer, processor	Indonesia	2.9 KHa	\$182.9M
Indofood Agri	11	13.1%	n/a		Producer, processor	Singapore	16.9 KHa	\$322.8M
HAGL Group	12	12.1%	n/a		Producer, processor	Vietnam	44.5 KHa	Private co.
J.A. WATTIE Tbk.	13	11.3%	n/a		Producer, processor	Indonesia	39.3 KHa	\$29.6M
FELCRA Berhad Malaysia	14	9%	n/a		Producer, processor	Malaysia	40.0 KHa	Private co.
Groupe Blattner Elwyn	15	0.8%	n/a		Producer, processor	Democratic Republic of the Congo	14.0 KHa	Private co.

Figure 9: SPOTT's ESG risk assessment of rubber producers and processors.

Other use of rubberwood²⁸

Rubberwood has traditionally been used as a cheap source of fuel wood in most of the countries where rubber plantations are abundant, such as for industrial brick burning, tobacco curing, or for fuelling of locomotive engines. Due to lack of durability, rubberwood was rarely used as utility timber except in timber-scarce countries. After a number of problems had been overcome with the help of applied research, particularly in connection with wood seasoning and preservation but also related to the small size of logs, rubberwood developed as one of the most successful export timbers of Southeast Asia. Salleh (1984) reported 61 different products made from rubberwood. The most important uses are furniture and furniture parts, parquet, panelling, wood-based panels, particleboard, cement and gypsum-bonded panels, medium-density fibreboard (MDF), kitchen and novelty. SBIOCI has tested trading rubberwood logs and sawn material to China, however costs in Côte d'Ivoire are too high to compete with rubberwood from Thailand.

Land ownership

Land tenure in Côte d'Ivoire is based above all on Law no. 98-750 of 23 December 1998 on rural land ownership, amended on two occasions by Law no. 2004-412 of 14 August 2004 (amendment of Article 26) and by Law no. 2013-655 of 13 September 2013 on the time frame granted for the establishing of customary rights on land in the customary sector (amendment of Article 6). There are also four implementing decrees for this law, which set in place the institutions necessary to its implementation.

²⁸ Killmann W. (2001): Non-Forest Tree Plantations, FAO, Rome, Italy

The Ivorian rural land ownership system is defined in Article 1 of the said Law and is made up of all land in Côte d'Ivoire except for land in the public domain, urban perimeters, State reserved land and classified forests.

Ivorian law, furthermore, differentiates between the rural land ownership system and the customary rural land ownership system, which has different legal systems (Art. 2 and 3 Law 23 December 1998). The Constitution, the Civil Code and the Forest Code (notably Articles 19 to 21) regulate the question of land title law, and Rural land title law is guaranteed by the State, the public authorities, and to individuals of Ivorian nationality (Article 12 of the Constitution; Article 1 Law of 23 December 1998). Thus, access to the rural land sector is conditional to Ivorian nationality, with the exception of property rights on land in the rural land sector acquired before the Law of 23 December 1998, which are maintained or may be transferred (Article 26 of the aforementioned law). Whilst it is no longer possible to orally declare oneself as owner, the exception raised in Article 26 shows that the law agrees to recognize, temporarily, customary rights before transforming them into official civil rights at the end of a procedure detailed below. Foreigners (or non-native populations) may not become owners but may nevertheless have rights of use on the land. Furthermore, it should be noted that this Law is trying to protect holders of customary rights via its Article 26; an initiative strengthened by Article 60 of Law no. 2015-537 of 20 July 2015.

Customary rights²⁹. In rural land, it is worth noting the provisions of Law No. 2015-537 of July 20, 2015 of agricultural orientation which, in addition to the establishment of a policy of securing the rights of customary landowners and landowners, on occupants on an identified property and for the delimitation of the territories of the villages, aims to promote the contractualization of the relationship between landowners and non-owner operators, as well as to resolve conflicts related to logging.

This legislative framework is an initial response to degradation factors resulting from encroachments by small cocoa and rubber producers. Article 53 of this law provides that the State encourages farmers to establish carbon sinks in their areas of operation, bearing in mind that any farm (including a family farm) must be registered and registered with the Chamber of Commerce. (Article 10), and that the operation must necessarily be in accordance with the regional management plan (Article 35), each plan being compatible with the Regional Land Use Plan (SRADT).

An articulation with the SRADT established by the local authorities is provided by the article 63 of this law, which stipulates well that these plans must specify the Land uses, which necessarily includes those where will be developed the activities of reduction of emissions from the program. Finally, this law insists on the settlement of land use conflicts, in particular to improve the cohabitation of farmers and loggers. This law is yet to be operationalized through regulatory measures, which will take into account the Payment for Environmental Services (PES) approach on rural land for sectoral activities involving cocoa and rubber producers as well as measures to manage timber harvesting, or firewood, including regulatory measures that will be adopted to implement the Benefit Sharing Plan.

Two types of ownership. The rural land sector is made up of two major types of ownership: permanent ownership and temporary ownership. Whilst the former refers to land held in perpetuity which may belong to the State (or to local authorities), to individuals or be land without owners (under the conditions laid down in Article 6), the latter has provisional status and concerns in particular, the land on which customary rights are exercised as well as land granted by the State to local authorities or to individuals.

²⁹ Forest Carbon Partnership Facility (FCPF), Carbon fund. Emission Reduction Program Document (ER-PD) for Tai National Park, Republic of Côte d'Ivoire. World Bank 2019 – Page 119

Furthermore, it should be noted that all 'lands belonging to no one' or "Terra nullius" belongs de facto to the State (Article 713 of the Civil Code, Article 6 of the Law of 23 December 1998). Article 6 of the Law of 23 December 1998 lists three scenarios in which land may be declared belonging to no one.

- Lands subject to inheritance that have not been claimed for more than three (3) years,
- Customary law lands on which customary rights are exercised peacefully and continuously, and on which there is no legal claim ten years after the publication of Law 98-750,
- Leased lands on which the concessionaire's rights could not be consolidated three years after the deadline for carrying out the development required by the concession agreement;

The default of land master is declared by an administrative act.

The State public domain is excluded from the Ivorian rural land sector (Article 2 of the Law of 23 December 1998) and it may not be assigned or seized and is imprescriptible. (Article 4 Order no. 2016-588 of 3 August 2016 on rights of occupancy of the public domain) and its occupancy by legal entities under public or private law may only be temporary (Article 7 Order no. 2016-588) since it is linked to execution of a mandate (Article 22). The public domain may also form the subject of an application for a declassification order to the Directorate of the State Public Domain so as to become a private, therefore alienable domain.

In Côte d'Ivoire, the permanent forest area of the State (State production forests, national parks and nature reserves) covers 19% of the territory, while the rural areas cover more than 78% (owned by individuals and collectives). Although Law 98/750 dated 23 December 1998 on rural land tenure, granted ownership of the land to the people, the fact remains that much of the rural land has not yet been subject to registration under the land tenure plan (Alden Wily, 2015). So for now, the State holds, via the Forest Code of 1965, a management control over all forest lands and resources of the country including those located in the rural areas.

Timber harvesting in Côte d'Ivoire is the responsibility of the Ministry of Water and Forests (MINEF). The MINEF has given management responsibility of State production forests to the Forest Development Corporation (SODEFOR), a structure under both the MINEF and the Ministry of Economy. Rural forest areas are under direct management of MINEF.

SODEFOR officers are responsible for the monitoring of harvesting on state production forests, and for monitoring of activities in rural forest areas, including through its own forest police. SODEFOR can also ask the MINEF forest police to investigate cases in state production forests as required. Other ministries are involved in the forest sector, such as the Ministry of Agriculture through the Department of Rural Land Tenure, the Ministry of Interior, the Ministry of Environment and Sustainable Development, the Ministry of Employment and Social Affairs, etc.

The forest law N° 2019-675 of 23th July 2019³⁰, regulates the exploitation of timber, firewood and charcoal. Logging takes place either in permanent forest areas of the State (State production forests) or in rural forest areas (PEF). In state production forests, SODEFOR holds the management and harvesting rights but may (and often does) contract with private operators who will manage the forest through a partnership agreement. In the rural forest areas, timber harvesting is governed by Decree No. 054/MINAGRA/DGEF/DPIF of 02 March 1995, laying down detailed rules for implementing Decree No.94-368 of 1 July 1994. This decree announced the creation of 170 logging areas (PEF) of at least 25,000 ha in the rural forest area of Côte d'Ivoire. These rural forests are granted, by order of the Minister in charge of forestry on the advice of a consultative commission (which, is not functional), to forest industrials or loggers.

³⁰ <http://www.droit-afrique.com/uploads/RCI-Code-2019-forestier.pdf>

Since Decision No 00471 / MINEF of 10 September 2003, the management of State production forests is opened to private companies. Through a partnership agreement with SODEFOR, private industrials can conduct forest management operations following a management plan and a cahier de charges (socio-economic commitments from companies towards the affected communities) prepared by SODEFOR. The forest products are essentially export-oriented at the expense of the local market for reasons ranging from taxation to market realities (there are no markets for products of second and third transformation in Côte d'Ivoire). This, coupled with poor forest governance in Côte d'Ivoire, has encouraged the emergence of a clandestine sector of artisanal loggers to supply the local market (CIFOR June 2015) (Louppe & Ouattara, 2013).

The forest sector in Côte d'Ivoire was in 2014 the subject to the Forest Act (Law 2014/427 dated 14 July 2014 covering the Forest Code) bringing major reforms in the sector including granting ownership of trees to landowners, creating the concept of community forests, etc.

Forest law of June 2019

To curb the phenomenon of deforestation, Côte d'Ivoire has taken a number of legislative and regulatory provisions to sustainable management of forests in rural areas, to classified forests, to national parks and to natural reserves. One of the provisions has been the adoption and promulgation of the law no. 2014-427 of July the 14th of 2014 named the forest code.

In view of the persistent acceleration of forest degradation and the new challenges of sustainable management, the challenges by an essentially rural economy, a new legal framework has been adapted to this evolution in June 2019 by a new forest law N° 2019-675 of 23th July 2019. In order to create a favourable framework for private investment and at the same time implementing ambitious programs for the preservation, rehabilitation and extension of forests, the new code strengthen the code of 2014.

The government adopted as a first step (May 23rd 2018) a Policy of Preservation, Rehabilitation and Extension of forests, focused on the conservation of forest relics, preservation of biodiversity, maintenance of a favourable climate for the development of socio-economic and agricultural activities; and lastly, the respect of international commitments of countries.

The forest law N° 2019-675 of 23th July 2019 is based on the policy of 23rd May 2018, and introduces among other things, new concepts such as agro-forestry, ecological public order, forest concession and independent observation, to enable the State to implement its forest policy in a participatory, multi-stakeholder and transparent approach, while highlighting the general interest and functions of forest ecosystems

In addition, the new law on the Forest Code enshrines a simplified classification of forests based on the property regime and has thus removed the ambiguities introduced in the classification of forests as outlined in the forest code 2014³¹.

Agro-industrial plantations of rubberwood are not part of the forest cover and there is no part of the forest code of 2014 or 2019 which directly regulates the rubberwood plantations.

There is a no-burn policy of rubberwood logs in the rubber plantations, there is however no official reference for this.

³¹ Republique de Côte d'Ivoire, Alassane Ouattara. Projet de Loi portant Code Forestier, expose de motifs (2019)

Environmental Impact Assessment

The environment of the rubberwood plantations is governed by the decree 96-894 of November the 8th 1996, the decree states that clearing of and projects of uncultivated land or semi-natural intensive farming with an area of over 999 ha require an Environmental Impact Assessment. Further, the following areas, appointed for harvest and replanting will also require an EIA:

- Protected areas and similar reserves;
- Wet areas and mangroves
- Areas of scientific, cultural, tourist interest;
- Ecologically sensitive defined areas;
- Protected perimeters around water points

FLEGT development

In February 2013, Côte d'Ivoire and the EU began negotiating a Voluntary Partnership Agreement (VPA) to promote trade in legal timber products and improve forest governance. The following summary present the development:

- Under a Voluntary Partnership programme (VPA), Côte d'Ivoire will develop a timber legality assurance system so it can issue FLEGT licences to verify legal timber products.
- Once Côte d'Ivoire begins FLEGT licensing, it will export to the EU only verified legal timber products accompanied by FLEGT licences.
- FLEGT-licensed timber products from Côte d'Ivoire will be able to enter the EU market without undergoing the due diligence checks required by the EU Timber Regulation.
- Existing initiatives in Côte d'Ivoire to trace and monitor the timber trade will form the basis of a timber legality assurance system that Côte d'Ivoire will develop under the VPA.
- Côte d'Ivoire has already taken steps to implement legal and governance reforms identified by stakeholders through the VPA negotiation process.
- Côte d'Ivoire has demonstrated significant achievements in ensuring that decisions related to the VPA are taken in a participatory way. Government, civil society, the private sector and traditional chiefs are working together to ensure the VPA is credible and has broad stakeholder support.
- Côte d'Ivoire is also making progress towards integrating land-based sectoral policies and activities, such as by including FLEGT as a pillar of its REDD+ strategy.
- In 2017, the Government of Côte d'Ivoire began an effort to modernise and harmonise its national policy on forests, agriculture and other land-based sectors in light of the realities of these sectors in order to provide a more effective governance framework.
- Ministry of Water and Forest of Côte d'Ivoire had its most recent meeting on Thursday, 11th of July 2019 with the following recommendations:
 - to bring together the platforms that disseminate information as part of due diligence to prevent the information from being contradictory from one platform to another for the same country;
 - continue discussions on the formalization of the TPME with the Taxes and CEPICI;
 - desirable reconciliations between MINEF, Client Earth and GNT-CI for the projects related to the elaboration of the texts of application and their extension;
 - GNT-CI shall make available to other structures / coordinators the list of media networked as part of its project;
 - continue to raise the awareness of stakeholders on the supply of legal timber and reforestation;
 - ensure better coordination of support for legal reform;

- desired reconciliation between the different forest monitoring initiatives (Geoportal, Images ...);
- desired meeting between the various project coordinators regarding the independent observation of forests; working session between the STP APV-FLEGT and MALEBI regarding their different projects on wood traceability and traceability of coal.

By November 2019 no FLEGT agreement has been put in place.

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 plantations³²:

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.

³² <http://www.cnra.ci/>

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 followings 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 cocoa³³.

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. This can be seen by average yield per hectare in the figure below. 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.

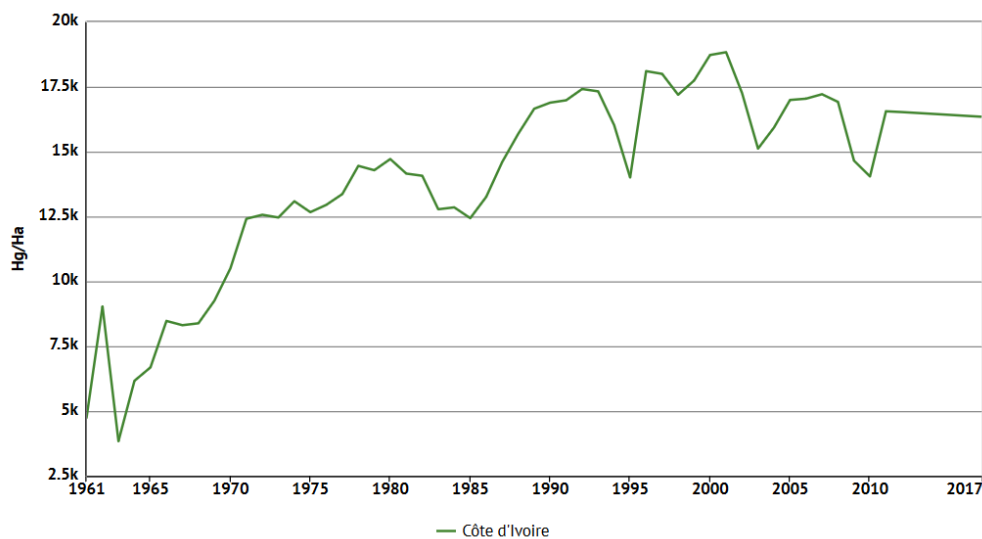


Figure 10: Average yield per hectare of latex

³³ Forest Carbon Partnership Facility (FCPF), Carbon fund. Emission Reduction Program Document (ER-PD) for Tai National Park, Republic of Côte d'Ivoire. World Bank 2019 – Page 46

Socio economic setting³⁴

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.

Political Context

Côte d'Ivoire has maintained a relative stability since the end of the 2010-2011 post-electoral war. But recent political developments have been fuelling tension in the country. With presidential polls due in October 2020, President Alassane Ouattara has not said whether he will seek a third term. The coalition he formed with Henri Konan Bédié, his former ally against Gbagbo, has collapsed and a presidential bid by Bédié cannot be ruled out.

Former president Laurent Gbagbo was acquitted by the International Criminal Court but released under conditions pending an appeal by the prosecutor. If the appeal is completed in time, he could possibly join the presidential race. Recent tension within the ruling RHDP coalition has also culminated in the recent resignation of the speaker of the Parliament, Guillaume Soro.

In the meantime, talks for the reform of the Independent electoral commission (CEI) has started between the government and representatives of opposition parties. The United Nations has at several occasions stressed the need to overhaul the CEI, saying that it does not reflect the reality of the political landscape of Côte d'Ivoire. Many Ivoirians fear that without consensus on a reformed electoral commission and enhanced confidence in an impartial election administration, the upcoming 2020 presidential poll would lack legitimacy risking a return to violence and conflict.

Economic Overview

The economy has expanded by an average of 8% per year since the exit of the political crisis in 2011, which makes Côte d'Ivoire one of the fastest growing country in the world during this period. However, the country's GDP growth has gradually declined from 10.1% in 2012 to 7.7% in 2017 and is estimated at 7.4% in 2018. The economy is facing the dual challenge of maintaining a rapid growth rate and of making it more inclusive (poverty remains high at 46.4%) while reducing fiscal imbalances. The proximity of the national elections (October 2020) may create uncertainty and have a negative impact on private investments.

Social Context

In early January, President Alassane Ouattara declared 2019 as a "year of social actions", with the aim to make social services available and affordable for the most vulnerable, create thousands of jobs for the youth and hire over 10,000 teachers for primary and secondary education. A few weeks later, public school teachers started a long strike from the end of January to early March after government negotiations with labour unions over allocations and conditions failed. Other civil servants have also threatened to walk out and end a truce that put to rest a series of strikes that paralyzed the administration and public services in 2017.

The consecutive years of rapid economic growth since 2012 have been less inclusive than expected. Poverty rate is still high in the country. In 2018, Côte d'Ivoire ranked 170th among 189 countries on the United Nations Human Development Index. Between 1985 and 2011, the depth and severity of poverty increased considerably, and the proportion of poor population rose from approximately 10% to 51%. However, the findings of the most recent Living Standards Monitoring Survey carried out by the government indicate that the recent economic upturn has brought the poverty rate back down to 46.3%.

³⁴ <https://www.worldbank.org/en/country/cotedivoire/overview>

The Government of Côte d'Ivoire must now strive to ensure that the most vulnerable segments of the population receive a greater portion of the spoils of economic growth. It must also work to develop the country's human capital to better meet the needs of the labour market. The production of modern goods and services requires skills that are still missing from the local workforce. Women must not be overlooked in this drive to develop human capital. Despite recent efforts, Côte d'Ivoire remains one of the countries with the highest gender inequality rates in the world.

Child labour³⁵

Children in Côte d'Ivoire engage in the worst forms of child labour, including in the harvesting of cocoa and coffee, sometimes as a result of human trafficking. According to a Multiple Indicator Cluster Survey conducted in 2016, 21.5 percent of children ages 5–17 are engaged in hazardous work³⁶.

In 2018, Côte d'Ivoire made a significant advancement in efforts to eliminate the worst forms of child labour. The government developed a new 2018–2020 National Action Plan of the Fight Against Trafficking, Exploitation, and Child Labour, and drafted a National Labour Inspection Strategy. The First Lady of Côte d'Ivoire signed a memorandum of understanding for carrying out applied research on child labour in cocoa-growing areas and opened a child protection centre that houses and provides education, medical care, counselling, and vocational training to victims of child labour. The government also took enforcement actions against violations of the worst forms of child labour, including sentencing a child trafficker to 3 years in prison. However, children in Côte d'Ivoire engage in the worst forms of child labour in the harvesting of cocoa and coffee, sometimes as a result of human trafficking. Gaps remain in resources, personnel, and training for law enforcement, which hindered child labour law enforcement efforts. Furthermore, the labour inspectorate is not authorized to assess penalties.

The same study mentions that child labour is found in the production of rubber and also as the worst forms of child labour that is forced labour. The study does however not give further details.

Corruption

Côte d'Ivoire is recovering from more than a decade of ethnic and political turmoil that plunged the country into civil war and post-electoral violence in 2010 and undermined the rule of law and effectiveness of governance institutions. Against this backdrop, corruption remains endemic, systemic, permeating all levels of society. Corruption in the judiciary, police and security forces is an area of particular concern, fuelling a climate of impunity for corruption.

³⁵ <https://www.dol.gov/agencies/ilab/resources/reports/child-labor/cote-divoire>

³⁶ UNESCO Institute for Statistics. Gross intake ratio to the last grade of primary education, both sexes (%). Accessed March 16, 2019. For more information, please see "Children's Work and Education Statistics: Sources and Definitions" in the Reference Materials section of this report. <http://data.uis.unesco.org/>.

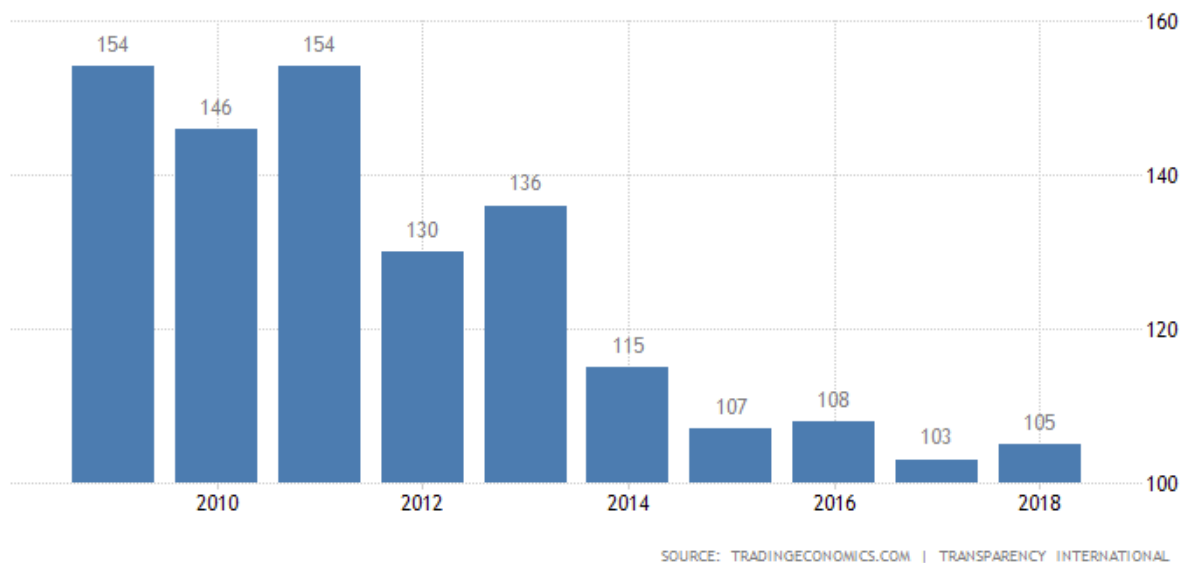


Figure 11: Historical corruption index for Cte d'Ivoire

Figure 10 shows historical data for Côte d'Ivoire’s position on Transparency International index, positioning CI as the 105 least corrupt nation out of 175 countries. Corruption rank in CI averaged 117,43 from 1998 until 2018, reaching an all-time high of 154 in 2009 and a record low in 1998.

President Ouattara has placed anti-corruption on his political agenda in recent years and taken a number of steps to address the country’s major governance challenges. In particular, a presidential anti-corruption decree was passed in 2013, and new anti-corruption bodies – such as the as the Brigade for the Fight Against Corruption in 2012, the High Authority for Good Governance in 2014 and the Anti-Racketeering Unit – were established to fight corruption at checkpoints. While it is too early to assess the effectiveness of these measures to address corruption, most governance indicators point to progress made in recent years to control corruption.³⁷

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 rubber³⁸.

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,

³⁷ <https://knowledgehub.transparency.org/helpdesk/cote-divoire-overview-of-corruption-and-anti-corruption>

³⁸ <http://www.reperci.org/about-us/mission>

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.

A minor part of the branches and logs are left in the plantations as a source of income for local firewood collectors, which enable the local population to source this a firewood instead of cutting other forest wood.

By extraction and use of the rubberwood trees SBIOCI support the no-burn policy. SBIOCI furthermore improves the safety standards for local workers by use of strict safety standard as per company HSSE policies. This is written and distributed in detail for each operation based on international standards. SBIOCI solely operates in plantations where the plantation owner guarantees a replanting process, this is a mandatory requirement.

As part of its social responsibility SBIOCI reinvest minimum 10% of profit 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'Ivoire³⁹.

Côte d'Ivoire has accessed the CITES in 1994. The standing committee of CITES has by 6th 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

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/8edcce954f2d64bff51f7dba2850930a/source/tree>

Other species

³⁹ <http://www.eauxetforets.gouv.ci/actualites/details/atelier-national-de-validation-de-l-avant-projet-de-loi-sur-le-commerce-international-des-espces-de-faune-et-de-flore-sauvages-menaces-extinction-cites360>

A range of other tree species and flora and fauna in general are found on CITES and IUCN list for Côte d'Ivoire:

- Ivory Coast Toad, *Sclerophrys danielae* – data deficient
- Ivory Coast Frog, *Amnirana occidentalis* - least concern
- Ivory Coast Running Frog, *Kassina arboricola* - vulnerable
- Ivory Coast Wart Frog, *Acanthixalus sonjae*- vulnerable
- Ivory Coast Snake-eater, *Polemon neuwiedi* - least concern
- Behan, *Berlinia occidentalis* - vulnerable
- Bois de Rose, *Berlinia confusa* - least concern
- Cedarwood, *Cedrela odorata* – CITES listed
- Rosewood, *Dalbergia spp* – CITES listed
- Black ebony - *Diospyros ferrea* – CITES listed
- Barwood, muninga, vène and mikwa - *Pterocarpus erinaceus* – CITES listed
- Afromosia, African teak, satinwood - *Pericopsis elata* – CITES listed

2.2 Actions taken to promote certification amongst feedstock supplier

SBIOCI strongly encourage rubberwood plantations to become FSC certified and several have indicated their interest. However, by June 2019 there is no FSC forest management standard covering Côte d'Ivoire. Bureau Veritas in Côte d'Ivoire and Cameroun have had contact with FSC Congo Basin and there are positive steps towards a development of an Interim National FSC standard for Côte d'Ivoire by 2020/21.

There was an initiative to develop FSC standards for Côte d'Ivoire in 2008 under the control of CODINORN (Côte d'Ivoire Standardization) and the IICF (Ivory Coast Forest Certification Initiative). However, due to lack of funding, the field tests could not take place. Working documents exist at CODINORM and IICF under the name CT13.

2.3 Final harvest sampling programme

Rubberwood plantations have a rotation length of 30-40 years with a maximum of 40 years. Therefore, no sampling programme is undertaken

2.4 Flow diagram of feedstock inputs showing feedstock type [optional]

All feedstock is primary directly from the rubberwood plantation, therefore: N/A

2.5 Quantification of the Supply Base

Supply Base

Country	Privately owned (PR), Public (PU), Community concession (CO) (mill. ha)	Boreal (BO), Temperate (TE), Tropical (TR) (mill. ha)	Plantation (PL), Managed natural (MA), Natural (NA) (mill. ha)	FSC ⁴⁰ (mill. ha)	PEFC ⁴¹ (mill. ha)	TOTAL (mill. ha)
Côte d'Ivoire	PU 3,4	TR 3,4	NA 0,6 MA 2,7	0	0	3,4

SBIOCI sources its feedstock from agro-industrial plantations defined as non-forest areas. The area of the supply base is 137.942 km² out of a total of 322.460 km² of the country.

Feedstock

- 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

* *Disclosure of the exact figures would reveal commercially sensitive information that could be used by competitors to gain competitive advantage. Volumes are sensitive as they may give competitors and idea about capacity, resources and market share*

⁴⁰<https://ic.fsc.org/en/facts-and-figures>

⁴¹<https://www.pefc.org/about-pefc/who-we-are/facts-a-figures>

3 Requirement for a Supply Base Evaluation

SBE completed	SBE not completed
X	<input type="checkbox"/>

In West Africa, FSC and PEFC have no FM standards covering Côte d'Ivoire, therefore no certified material is available and an SBE is needed.

4 Supply Base Evaluation

4.1 Scope

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.

All feedstock is primary and can be traced back to the specific area in the plantation where it originates from. The feedstock is a by-product (end-of-life product) in the form of rubberwood trees which were used for latex production but no longer effectively produce latex. Production of latex takes place in mono-cultures of rubber trees (*Hevea brasiliensis*) in rotations of 30-40 years length, ending with overturning and replanting of the next generation. Latex is also produced by small scale out-growers, typically with 1 to 15 hectares, these are not part of the scope.

The scope only covers agro-industrial plantations with 100+ hectares. The species covered is rubberwood (*Hevea brasiliensis*)

The supply chain for SBIOCI is that logs originating from aged and non-productive rubberwood compartments designated for replanting are extracted and chipped at a central 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 CIF.

Intermediate storage sites (have not been designated by the time of audit) will be located near the port of Abidjan and near the port of San Pedro.

The transfer of ownership can take place at the port of origin in Côte d’Ivoire or at the port of destination (rarely), in which case SBIOCI handles the maritime transport of the biomass.

SBIOCI scope per indicator in Standard 1, Annex 1 has been defined as follows:

- Harvesting: Specific compartment and areas touched by SBIOCI’s harvesting and chipping operation.
- Plantation: Entire plantation including rubber production areas, biodiversity and forest areas, and all non-forest areas,
- Supplier: All plantations covered by the supplier’s company registration number

		Comments
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	Potentially 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	Plantation in case of extension?
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	Potentially plantation
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	Potentially 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	Potentially supplier, through policy of association
2.7.3 - The Biomass Producer has implemented appropriate control systems and procedures to verify that feedstock is not supplied using child labour.	Plantation	Potentially supplier, through policy of association

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	Potentially plantation
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	

4.2 Justification

The Supply Base Evaluation is justified by the company’s intention to add value to sustainable development by selling low risk feedstock of rubberwood residue, which is otherwise left to rot, with an “SBP compliant” biomass claim.

In West Africa FSC has no FM standard covering Côte d’Ivoire, therefore no certified material is available. Bureau Veritas in Côte d’Ivoire and Cameroun have had contact with FSC Congo Basin and there are positive steps towards a development of an Interim National FSC standard for Côte d’Ivoire by 2020/21 but this may be delayed and depends on the interest and willingness of companies.

SBIOCI assess that due to the lack of FSC FM certified suppliers, SBP is the strongest certification system fulfilling the demands of European power plants.

The risk analysis has been approached from the perspectives, that deforestation is and has been severe in Côte d’Ivoire with forest cover shrinking from 16 million hectare to 3.4 million hectare during the last century; that corruption is widespread with a score of 35 out of 100 (Transparency International CPI index); that land right issues exists; that decent living conditions are challenged; that feedstock originates from 30-40 year old agro-industrial plantations (100+ hectare) with challenges in use of pesticides and that the Government of Côte d’Ivoire since 2011 has engaged in a large range of political instruments addressing the aforementioned challenges.

4.3 Results of Risk Assessment

Once all the SBP-defined indicators were analysed, the following indicators was designated as specified risk requiring risk mitigation measures.

- 1.1.1 - The Biomass Producer’s Supply Base is defined and mapped
- 1.1.2 - Feedstock can be traced back to the defined Supply Base

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

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

4.4 Results of Supplier Verification Programme

No unspecified indicators were identified.

4.5 Conclusion

The Risk Assessment has led to 25 indicators assessed with specified risk and 13 indicators assess with low risk.

The SBE process had 3 steps:

1. Initial desk based assessments: findings for all indicators (August to October 2019)
 - a. 15 low risk, 23 specified risk,
2. Pre-assessment and field inspections:
 - a. Team of 2-4 SBP CB auditors, 1 SBP consultant/forester, 2 SBIOCI personnel (administrator and operations responsible), plantation managers/HR of 2 plantations (November 2019)
3. Second desk assessment: qualifying findings with further references (November 2019)

The three step process has strongly qualified the scope for each indicator and focused the findings to a level where it was possible on basis of references and field inspections to make solid conclusions.

The scope for each indicator has been defined to three levels: 1. Harvest operation, 2. Plantation and 3. Supplier. With as much as 25 specified indicators, the three scope levels strongly focus the findings and the mitigation measures for each indicator.

The main weaknesses during the SBE was that no qualified personal with specific knowhow about industrial rubber plantations and a certification profile could be found. The SBP consultant who has been engaged is a forester/economist with extensive experience from West Africa but without specific knowhow of Côte d'Ivoire or the rubber industry. Long persistent and good discussions with the founders of SBIOCI and the 3 step process has finally led to strong conclusions. As part of the pre-assessment 10 stakeholders were asked for

input, it proved very hard to get feedback partly due to a language barrier and partly due to a wish from stakeholders about face to face meetings, 2 stakeholders responded. The experiences from the SBE process will be used to develop a strong stakeholder consultation before the initial audit.

The final conclusion is that the strong definition of scope for all indicators and specifically the 25 specified risk indicators will ensure that the specified feedstock will be in full compliance with SBP standards.

5 Supply Base Evaluation Process

To conduct the risk analysis and implement the SBP-certification process, SBIOCI assigned Anders Bjørnkjær-Nielsen together with co-founder Bo Christensen to manage the process. Klaus Kroll co-founder organized the structure and the initial testing of the mitigation measures.

Personnel

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 successful working experience with SBP 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.

SBE Process

The SBE had the following steps:

- Initial desk based assessments (August to October 2019)
- Pre-assessment (November 2019)
 - a. On-site discussion of all finding and testing of mitigation measures
 - b. field inspections at two plantations
 - c. discussion of requirements for organizational setup related to mitigation measures
- Second desk assessment: (November 2019)

As part of the pre-assessment SBIOCI tested if stakeholder input were possible to get. 10 stakeholders were asked for input, it proved very hard to get feedback partly due to a language barrier and partly due to a wish from stakeholders to have face to face meetings, 2 stakeholders gave some feedback. The experiences will be used for later stakeholder consultations.

Future organization

SBIOCI is strongly aware that 25 indicators from the Risk Assessment are specified and that it will take 1-3 months prior to the beginning of a harvest operation to assess if a supplier and specific compartment of

rubber trees potentially can be compliant. Further SBIOCI have a sampling plan to monitor future and past projects. Typically, a plantation overturn 100 hectare at a time, this justifies for the extensive work with risk mitigation.

Risk mitigation is organized in 3 teams:

The information collection team (1-2 persons at MSc level, forester, economist, sociologist or similar)

- Plantation headquarters, hard data: land title documents, payroll documentation, pesticides and emballage, management plans etc.
- Workers and local communities, soft data collection: Interviews with plantation workers and local communities. Purpose is clarification about land right disputes, salaries, forced labour, child labour, etc.
- The forestry team. on-site inspection of size of compartments, slope gradient, water bodies, drone mapping etc.

The compliance team (SBP consultant; SBIOCI administrator; SBIOCI chief operational officer)

- Risk assessment for every specified risk indicator
- Description of instructions for the operational team
- Compliance decision

The operational team (SBIOCI chief operational officer)

- Pre- and postharvest meetings with plantation
- Site specific instructions; extraction routes, escape and evasion, internal storage etc.

Sampling

The number of projects covered per year will be very limited (2-5 projects) due to the high volume of biomass found at each plantation. Sampling is therefore focused on the number of people to be interviewed in order to get low risk assessment. Sample size calculation will be used on the basis of the number of workers in the plantations.⁴²

⁴² <https://www.surveysystem.com/sscalc.htm>

6 Stakeholder Consultation

Stakeholder consultation took place during pre-assessment in October-November 2019 and again 60 days prior to main assessment in February 2020. Stakeholders were invited to comment on initially a draft Risk Assessment and later the completed Supply Base Report and Risk Assessment.

Initially stakeholder were contacted by e-mail and phone, For the main audit stakeholders were contacted by e-mail, phone, with a prospectus for a face to face meeting at SBIOCI's office in Abidjan. The face to face meeting was held on 14th of January 2020 from 15.00 to 18.00 at SBIOCI's office in Abidjan.

Below the list of stakeholders contacted.

No	Organisation	Name	E-mail	Phone
1	Union Generales des Travailleurs de CVI www.ugtci.org		ugtcisg@yahoo.fr ugtci@ugtci.org	(225) 21 24 09 78
2	Réseau Alerte Foncier http://www.inadesformation.net/	Tolla Kouassi Ismaël	ismael.tolla@inadesfo.net	(225) 22 40 02 16
3	Jeunes volontaires pour l'environnement http://jve-international.net/		yvetogo@gmail.com jve.ivoire@yahoo.fr	
4	Solidaridad development	Charles Baimey	charlesbaimey@yahoo.fr	
5	IDEF « au service des communautés et de la Forêt »	Marc- Anthelme KOUADIO	ongidef2014@gmail.com marcanthelme@gmail.com	(225) 22 50 18 61
6	SODEFOR http://www.sodefor.ci/	Aphonse Tapé	alphonsetape@gmail.com	(225) 03 58 96 01 (225) 09 24 211
7	Eau - Assainissement - Environnement UFR Sciences et Gestion de l'Environnement (SGE) Université Nangui Abrogoua (Abidjan/CI)	EFFEBI Kôkôh Rose, Maître de Conférences, Enseignant- chercheur	effeb2001@yahoo.fr	(225) 09 29 25 49
8	Global Platform for Sustainable Natural Rubber https://www.gpsnr.org/	Stefano Savi	stefano.savi@gpsnr.org	(65) 92 97 06 36
9	APROMAC http://apromac.ci/	Attobra Akpangni	infos@apromak.ci apromak@aviso.ci	
10	Care Cote d'Ivoire https://www.care.org/country/cote-divoire	Flora Oualogo Youssouf Ndjore	Youssouf.Ndjore@care.org Flora.Oualogo@care.org	

11	CNS - Comité Nationale de Surveillance des Actions de Lutte Contre la traite, l'exploitation et le travail des enfants http://travaildesenfants.org/	Coulibaly Brahima Sala Dembelé	brahima22fr@gmail.com saladembele@gmail.com	
12	MINEF http://www.eauxetforets.gouv.ci/	Capitaine Don Sun	bassimori@yahoo.fr	
13	SEED4AFRICA https://www.seed4africa.org/	Alumnus Hermes Adjéa	donsunsunda@ymail.com banyakoffi87@gmail.com	
14	BIOKALA https://www.groupesifca.com/en/what-is-biomass.php	David Billon	communication@sifca.ci	(225) 21 75 75 75
15	SYNACOS / SODEFOR COCODY http://www.sodefor.ci/		ciskwodie@gmail.com	(225) 01 41 36 36
16	ADR https://adrcihydraulique.wixsite.com/adr-ci-hydraulique	Antonio Guiliano De Rosa	adr.rappresentanze@libero.it adr.ci.hydraulique@gmail.com	(225) 88 17 23 35

6.1 Response to stakeholder comments

Below scheme with organisation, comments and responses from the stakeholder consultation.

Organisation/Name/month	Comments / responses
GPSNR, Stefano Savi, November 2019	November 2019, comment: Stefano Savi considered the SBR at the first process, he only had a minor correction regarding GPSNR Response: Correction made
EFFEBI Kôkôh Rose, Université NanguiAbrogoua (Abidjan/CI), November 2019	November 2019, comments: <ol style="list-style-type: none"> 1. Biomass is an added value for the sustainable development 2. Does SBIOCI do an EIA for each compartment 3. Quantitative and qualitative assessment of the resource base. Will the harvest of biomass shorten the rotation period. 4. Regarding outgrowers: Capacity building of suppliers can optimize cooperation 5. Social responsibility: SBIOCI has in its foundation to reinvest minimum 10% in similar projects 6. Water impact: Which mitigation measures is it possible to put in place in order to mitigate water run-off with pesticides. 7. Look on alternatives to biomass from Hevea e.g. cashew shells, palm oil residue and similar. Response: Mitigation measures adjusted accordingly.
Kouassi Ismaël Tolla Assistant Technique Projet ALERTE-Foncier Secrétariat Général	January 14th 2020, comment: Mr. Tolla then informed that the land law n ° 298 of December 23, 1998 instead of n ° 750 of September 23, 1998 (contained in the Supply Report), was revised on October 14, 2019 under the new forest code titled Law No. 2019-675 of July 23,

<p>Rue C13 Booker Washington Abidjan Cocody - 08 BP 8 Abidjan 08 Tel. (225) 22 40 02 16 Fax. (225) 22 40 02 30 ismael.tolla@inadesfo.net http://www.inadesformation.net January 2020</p>	<p>2019. He would like us to use it to facilitate work. In fact, he 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.</p> <p>Then, Mr. Tolla pronounces on 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 we make sure that the State has fulfilled its purge of customary rights from the populations of the village of Abadjin-kouté. According to him, this verification can be done in the official journal of Côte d'Ivoire</p> <p>Response: Mitigation measure considered to capture the request made by mr. Tolla</p>
<p>Madame Commandant Diomandé Fatoumata SODEFOR January 2020</p>	<p>January 14th 2020, comment:</p> <p>Madame Commandant Diomandé Fatoumata commented on the Power point presentation and wishes that the methodology of the presentation be reviewed while starting with the presentation of SBIOCI. Then, she clarified the use of certain terms as legal and regulatory requirements (contained in the context of the Power point presentation) than simply speaking of legal requirements. It proposes to check with SAPH and SODEFOR to check the GPS coordinates of the TRCI plantation in order to certify the extent of the plantations since 2008 (mapping of the boundaries of the TRCI plantation). Also, she 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.</p> <p>Also, She promised to relay the information to her hierarchical superiors to produce an authorization to SBIOCI which could allow them to meet a certain number of requirements and which specifies their source of supply. In addition, it invites SBIOCI to associate its image with that of the Ministry in the 2020 reforestation project, since the exploitation of rubber plantations causes a reduction in the carbon stock of emissions released into the air. Clearly, rubber plantations do not constitute forests, but they do help forests in the carbon storage of emissions released into the atmosphere, according to the commander. However, the captain explains that the FSC is not applicable in Côte d'Ivoire despite all the tests but there are OLB certified forests (Legal Wood Origin) in Côte d'Ivoire.</p> <p>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 of the TRCI and also if there was the purge of customary rights the village of Abadjin-Kouté; SODEFOR, SAPH or TRCI concerning the GPS coordinates of the TRCI plantation; subcontracting employers or regional</p>

	<p>labor inspection offices with regard to the employment contracts of their employees.</p> <p>Response: Mitigation measure considered to capture the request made by Madame Commandant Diomandé Fatoumata</p>
<p>Georges Kouassi Legal Entity Manager Business Development in Cote d'Ivoire Representative Agriculture Auditor Skype: geokouassi Adress: 21 Po Box 125 Abidjan 21 gkouassi@nepcon.org January 2020</p>	<p>January 14th 2020, comment:</p> <p>Mr. Georges Kouassi asks to ensure the veracity of the information received on the TRCI site from employers. He emphasizes that care must be taken to ensure that all workers have an employment contract that meets the requirements for certification. Also, for him verifications can be made at the level of regional labor inspection offices to already identify employment contracts.</p> <p>Response: Mitigation measure considered to capture the request made by George Kouassi</p>

7 Overview of Initial Assessment of Risk

In accordance with the requirements of SBP standard 1, for primary feedstock originating within SBIOCI’s Supply Base in Cote d’Ivoire and for the defined scope, SBIOCI identified 25 indicators with specified risk

Table 1. Overview of results from the risk assessment of all Indicators (prior to SVP)

Indicator	Initial Risk Rating		
	Specified	Low	Unspecified
1.1.1	X		
1.1.2	X		
1.1.3		X	
1.2.1	X		
1.3.1	X		
1.4.1		X	
1.5.1	X		
1.6.1	X		
2.1.1		X	
2.1.2		X	
2.1.3	X		
2.2.1	X		
2.2.2	X		
2.2.3		X	
2.2.4		X	
2.2.5	X		
2.2.6	X		
2.2.7	X		
2.2.8	X		
2.2.9	X		

Indicator	Initial Risk Rating		
	Specified	Low	Unspecified
2.3.1		X	
2.3.2	X		
2.3.3		X	
2.4.1		X	
2.4.2		X	
2.4.3		X	
2.5.1	X		
2.5.2		X	
2.6.1	X		
2.7.1	X		
2.7.2	X		
2.7.3	X		
2.7.4	X		
2.7.5	X		
2.8.1	X		
2.9.1	X		
2.9.2	X		
2.10.1		X	

8 Supplier Verification Programme

8.1 Description of the Supplier Verification Programme

No unspecified indicators were identified..

8.2 Site visits

No unspecified indicators were identified.

8.3 Conclusions from the Supplier Verification Programme

No unspecified indicators were identified.

9 Mitigation Measures

9.1 Mitigation measures

Mitigation measures have been developed to minimise the specified risks and as such, include all the material within the scope and the Supply Base as “SBP compliant biomass”

For all specified risks, mitigation measures will be handled internally by SBIOCI and only if all measures lead to low risk will the feedstock be categorized as compliant.

If a supplier is excluded, the finding of the mitigation measure which leads to exclusion/non-compliance shall be investigated. If SBIOCI consider it realistic and if it is a finding which can be developed e.g. social working condition, SBIOCI will work together with the plantation to change the non-compliance to compliance - a clear action plan will be made. The action plan shall be implemented within a very limited time frame with the involvement of SBIOCI. Reasons for exclusion/non-compliance shall be addressed and solved before biomass can be considered compliant.

Below the 25 specified risk indicators and mitigations measures are listed:

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

Mitigation Measure:

- Drone maps or other maps of sufficient scale and quality.
- Contract covering the area of operation.
- Land title (Titre foncier / certificat foncier + if available cadastral map).
- 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.

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

Specified risk regarding traceability from plantation to vessel is mitigated by the following means:

- 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.

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.

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 + if available cadastral map) of the supplier:

- Copy of full land title (Titre foncier / certificat foncier + if available cadastral map) 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 a sample of communities surrounding plantations of the supplier:

- If the supplier has 1 plantation then the nearest communities shall be consulted.
- If the supplier has 2 and up plantations then the nearest communities of the plantation with harvest operation shall be consulted. Furthermore, for each of the plantations without harvest operation the main community will as a minimum be consulted
- 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.

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.

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.

Within each group indications of conversions will be analysed. The groups are analysed in the following order.

1. CONTRACT (A) If contract negotiations initially lead to no indications of conversion continue to 2.
2. TITRE FONCIER (B) If inspection of titre foncier + cadastral map lead to no indication of conversion continue to 3.
3. HISTORICAL REPORTS AND MAPS (C) if inspection of historical reports and maps lead to no indication of conversion continue to 4.
4. CONSULTATION WITH COMMUNITIES (E) if consultation with communities lead to no indication of conversion continue to 5.
5. CONSULTATION WITH MANAGEMENT. The management is questioned about indications found during step 2-4, if management by document can support that there is low risk related to the indications then SBIOCI assess low risk for conversion. If documentation is weak continue to 6 and/or 7.
6. FIELD inspections (D). If no indications are found for conversion it is concluded that there is low risk of conversion.
7. AGROFORESTRY/OTHER MANAGED LAND INVESTIGATION. If there is uncertainty about conversion of agroforestry/other managed land versus forested land this shall be investigated and documented i) by community consultations (E); ii) by examining available reports of impact assessment and similar and iii) by interviewing staff in the environmental department (or similar) about the former status of the land. If investigations and documentation conclude that agroforested/other managed land has been converted then the overall conclusion is low risk of conversion. If investigations and documentation conclude that forest has been converted then the overall conclusion is exclusion of 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 + if available cadastral map) of the supplier:

- Copy of full land title (Titre foncier / certificat foncier + if available cadastral map) 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) (2)	Rubber plantation (ha)	Other area e.g. housing and factory (ha) (4)	Replanted area (ha) (5)	Expansion of plantation (ha) (6)	Total (ha) (7)
Year	(1)	(2)	(3)	(4)	(5)	(6)	(7)
2008							
2015							
Present							

Indications for conversion 1: decline in Forêt classée, biodiversity area, forest area.

Indications for conversion 2: expansion in rubber plantation; other agricultural area; housing and factory area

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)
- Indications of low risk: Landuse of neighbouring land in 2008, agriculture or plantation with rubber, oil palm, cocoa, cashew.
- Indications of conversion: Landuse of neighbouring land in 2008: forestry; tree stumps inside plantation with diameter of 80+ cm’s

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

- If the supplier has 1 plantation then the nearest communities shall be consulted.
- If the supplier has 2 and up plantations then the nearest communities of the plantation with harvest operation shall be consulted. Furthermore, for each of the plantations without harvest operation the main community will as a minimum be consulted
- 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.
- Low risk indications for conversion: use as farmland or agroforestry (e.g. with cocoa, cashew, oil palm trees in combination with agriculture), sale of non-forest products.
- Indications of conversion: independent memories of the same specified forested land allocations being converted after 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

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 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 + if available cadastral map) of the supplier:

- Copy of full land title (Titre foncier / certificat foncier + if available cadastral map) 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 a sample of communities surrounding plantations of the supplier:

- If the supplier has 1 plantation then the nearest communities shall be consulted.
- If the supplier has 2 and up plantations then the nearest communities of the plantation with harvest operation shall be consulted. Furthermore, for each of the plantations without harvest operation the main community will as a minimum be consulted
- 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

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 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.

Within each group indications of conversions will be analysed. The groups are analysed in the following order.

1. CONTRACT (A) If contract negotiations initially lead to no indications of conversion continue to 2.
2. TITRE FONCIER (B) If inspection of titre foncier + cadastral map lead to no indication of conversion continue to 3.
3. HISTORICAL REPORTS AND MAPS (C) if inspection of historical reports and maps lead to no indication of conversion continue to 4.
4. CONSULTATION WITH COMMUNITIES (E) if consultation with communities lead to no indication of conversion continue to 5.
5. CONSULTATION WITH MANAGEMENT. The management is questioned about indications found during step 2-4, if management by document can support that there is low risk related to the indications then SBIOCI assess low risk for conversion. If documentation is weak continue to 6 and/or 7.
6. FIELD inspections (D). If no indications are found for conversion it is concluded that there is low risk of conversion.
7. AGROFORESTRY/OTHER MANAGED LAND INVESTIGATION. If there is uncertainty about conversion of agroforestry/other managed land versus forested land this shall be investigated and documented i) by community consultations (E); ii) by examining available reports of impact assessment and similar and iii) by interviewing staff in the environmental department (or similar) about the former status of the land. If investigations and documentation conclude that agroforested/other managed land has been converted then the overall conclusion is low risk of conversion. If investigations and documentation conclude that forest has been converted then the overall conclusion is exclusion of 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 + if available cadastral map) of the supplier:

- Copy of full land title (Titre foncier / certificat foncier + if available cadastral map) 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) (2)	Rubber plantation (ha)	Other area e.g. housing and factory (ha) (4)	Replanted area (ha) (5)	Expansion of plantation (ha) (6)	Total (ha) (7)
Year	(1)	(2)	(3)	(4)	(5)	(6)	(7)
2008							
2015							
Present							

Indications for conversion 1: decline in Forêt classée, biodiversity area, forest area.

Indications for conversion 2: expansion in rubber plantation; other agricultural area; housing and factory area

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)
- Indications of low risk: Landuse of neighbouring land in 2008, agriculture or plantation with rubber, oil palm, cocoa, cashew.
- Indications of conversion: Landuse of neighbouring land in 2008: forestry; tree stumps inside plantation with diameter of 80+ cm’s

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

- If the supplier has 1 plantation then the nearest communities shall be consulted.
- If the supplier has 2 and up plantations then the nearest communities of the plantation with harvest operation shall be consulted. Furthermore, for each of the plantations without harvest operation the main community will as a minimum be consulted
- 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.
- Low risk indications for conversion: use as farmland or agroforestry (e.g. with cocoa, cashew, oil palm trees in combination with agriculture), sale of non-forest products.
- Indications of conversion: independent memories of the same specified forested land allocations being converted after 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.

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 it's best to prevent oil spills, minimize damage to soil and protect buffer zones. SELLER mitigate 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°) ; 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
 - Erosion prevention moderate terrain: roots are piled in long rows along the rows of the new trees.
 - Erosion prevention moderate and steep terrain: At preharvest meeting it is clarified that pilling of roots has to happen immediately following the completion of the harvest and that the turning over of the old plantation is max 2 weeks ahead.
 - 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
- 3 days of rain => skidding stops

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.

Regarding D, maintenance of machinery

- Maintenance schedule
- Registration of maintenance

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 and 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
 - Erosion prevention moderate terrain: roots are piled in long rows along the rows of the new trees.
 - Erosion prevention moderate and steep terrain: At preharvest meeting it is clarified that pilling of roots has to happen immediately following the completion of the harvest and that the turning over of the old plantation is max 2 weeks ahead.
 - 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
- 3 days of rain => skidding stops

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

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

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.

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
 - Erosion prevention moderate terrain: roots are piled in long rows along the rows of the new trees.
 - Erosion prevention moderate and steep terrain: At preharvest meeting it is clarified that pilling of roots has to happen immediately following the completion of the harvest and that the turning over of the old plantation is max 2 weeks ahead.
 - 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
- 3 days of rain => skidding stops

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 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.

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.

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

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

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 + if available cadastral map) of the supplier:

- Copy of full land title (Titre foncier / certificat foncier + if available cadastral map) 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 a sample of communities surrounding plantations of the supplier:

- If the supplier has 1 plantation then the nearest communities shall be consulted.
- If the supplier has 2 and up plantations then the nearest communities of the plantation with harvest operation shall be consulted. Furthermore, for each of the plantations without harvest operation the main community will as a minimum be consulted
- 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

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 + if available cadastral map) of the supplier:

- Copy of full land title (Titre foncier / certificat foncier + if available cadastral map) 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 a sample of communities surrounding plantations of the supplier:

- If the supplier has 1 plantation then the nearest communities shall be consulted.
- If the supplier has 2 and up plantations then the nearest communities of the plantation with harvest operation shall be consulted. Furthermore, for each of the plantations without harvest operation the main community will as a minimum be consulted
- 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

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: If there are indications of workers being discouraged from joining syndicates the plantation shall address the problem within a short period of time or become excluded. Indications shall be addressed and solved before biomass can be considered compliant.
- Questionnaires to be saved for 5 years

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

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.

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 are divided in 3 groups: A. Contract with seller; B, payroll package score linked to biomass price C. comparison of salary between men and woman D. 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 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: 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
Free electricity	CFA9.148	Avg kWh/price = 72,604 CFA (https://www.globalpetrolprices.com/Ivory-Coast/electricity_prices/) - 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 % - http://www.cnps.ci/Anglais/employer/social-contributions/Pages/Contribution-rate.aspx
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%	
The plantation is paid 92,94 % of the agreed price per metric tons		

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
- 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.

Regarding C. Comparison of salary between men and women

- Comparison of minimum 5 pays slips from woman with 5 pays slips from men, with same experience and function. If a significant difference is found between the average of men and women the plantation will be asked why this is the case.
- SBIOCI will provide examples of best practices for working with equal rights between men and woman.

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.
- If salary bulletins/contract 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.
- Other in-kind documentation.

Regarding D. Best practice

Policy for equal rights between women and men

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 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: 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
Free electricity	CFA9.148	Avg kWh/price = 72,604 CFA (https://www.globalpetrolprices.com/Ivory-Coast/electricity_prices/) - 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 % - http://www.cnps.ci/Anglais/employer/social-contributions/Pages/Contribution-rate.aspx
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%	
The plantation is paid 92,94 % of the agreed price per metric tons		

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
- 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.
- If salary bulletins/contract 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.
- Other in-kind documentation.

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

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.

Within each group indications of conversions will be analysed. The groups are analysed in the following order.

1. CONTRACT (A) If contract negotiations initially lead to no indications of conversion continue to 2.
2. TITRE FONCIER (B) If inspection of titre foncier + cadastral map lead to no indication of conversion continue to 3.
3. HISTORICAL REPORTS AND MAPS (C) if inspection of historical reports and maps lead to no indication of conversion continue to 4.
4. CONSULTATION WITH COMMUNITIES (E) if consultation with communities lead to no indication of conversion continue to 5.
5. CONSULTATION WITH MANAGEMENT. The management is questioned about indications found during step 2-4, if management by document can support that there is low risk related to the indications then SBIOCI assess low risk for conversion. If documentation is weak continue to 6 and/or 7.
6. FIELD inspections (D). If no indications are found for conversion it is concluded that there is low risk of conversion.
7. AGROFORESTRY/OTHER MANAGED LAND INVESTIGATION. If there is uncertainty about conversion of agroforestry/other managed land versus forested land this shall be investigated and documented i) by community consultations (E); ii) by examining available reports of impact assessment and similar and iii) by interviewing staff in the environmental department (or similar) about the former status of the land. If investigations and documentation conclude that agroforested/other managed land has been converted then the overall conclusion is low risk of conversion. If investigations and documentation conclude that forest has been converted then the overall conclusion is exclusion of 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 + if available cadastral map) of the supplier:

- Copy of full land title (Titre foncier / certificat foncier + if available cadastral map) 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							

Indications for conversion 1: decline in Forêt classée, biodiversity area, forest area.

Indications for conversion 2: expansion in rubber plantation; other agricultural area; housing and factory area

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)
- Indications of low risk: Landuse of neighbouring land in 2008, agriculture or plantation with rubber, oil palm, cocoa, cashew.
- Indications of conversion: Landuse of neighbouring land in 2008: forestry; tree stumps inside plantation with diameter of 80+ cm’s

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

- If the supplier has 1 plantation then the nearest communities shall be consulted.
- If the supplier has 2 and up plantations then the nearest communities of the plantation with harvest operation shall be consulted. Furthermore, for each of the plantations without harvest operation the main community will as a minimum be consulted
- 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.
- Low risk indications for conversion: use as farmland or agroforestry (e.g. with cocoa, cashew, oil palm trees in combination with agriculture), sale of non-forest products.
- Indications of conversion: independent memories of the same specified forested land allocations being converted after 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."

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

9.2 Monitoring and outcomes

Both the functionality of the mitigation measures as well as projects will be monitored on a pending and annual basis via an internal monitoring programme.

Projects will be checked on the basis of sampling.

Mitigation measures will be checked annually or if they are found to be inappropriate on a pending basis.

Non-compliance and complaints procedures are implemented

10 Detailed Findings for Indicators

Detailed findings for each Indicator are given in Annex 1.

11 Review of Report




11.1 Peer review

The Risk Assessment as well as the Supply Base Report have been reviewed by Alphonse Tape, Forest Engineer and MSc. in Botanic, Directeur du Centre de Gestion SODEFOR de Bouaké/ Director of Management Centre of SODEFOR in Bouaké and member of FSC in Côte d'Ivoire.

11.2 Public or additional reviews

Not applicable.

12 Approval of Report

Approval of Supply Base Report by senior management			
Report Prepared by:	 ANDERS BJØRNKJÆR-NIELSEN	Certifications	20.02.2020
	Name	Title	Date
The undersigned persons confirm that I/we are members of the organisation's senior management and do hereby affirm that the contents of this evaluation report were duly acknowledged by senior management as being accurate prior to approval and finalisation of the report.			
Report approved by:	 BO CHRISTENSEN	Co-founder & Chief Executive Officer (Gérant)	20.02.2020
	Name	Title	Date
Report approved by:	 KLAUS HJORTENBERG KROLL	Co-Founder and Chief Operating officer	20.02.2020
	Name	Title	Date
Report approved by:	[name]	[title]	[date]
	Name	Title	Date

13 Updates

13.1 Significant changes in the Supply Base

Not applicable.

13.2 Effectiveness of previous mitigation measures

Not applicable.

13.3 New risk ratings and mitigation measures

Not applicable..

13.4 Actual figures for feedstock over the previous 12 months

*Using the categories in Section 2.5 'Quantification of the Supply Base' (above), give an update on the actual figures for the previous 12 month period. Volume may be shown in a banding between XXX,000 to YYY,000 tonnes or m³ if a compelling justification is provided**

13.5 Projected figures for feedstock over the next 12 months

Total volume of Feedstock*: 0 – 200,000 tonnes

**Disclosure of the exact figures would reveal commercially sensitive information that could be used by competitors to gain competitive advantage. Volumes are sensitive as they may give competitors and idea about capacity, resources and market share*

Annex 1: Detailed Findings for Supply Base Evaluation Indicators

	Indicator																											
1.1.1	The Biomass Producer’s Supply Base is defined and mapped.																											
Finding	<p>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.</p> <p>Rubberwood biomass is produced at agro-industrial plantations located in the Southern part of Côte d’Ivoire. The feedstock is a by-product (end-of-life product) in the form of rubberwood trees which were used for latex production but no longer effectively produce latex. Production takes place in mono-cultures of rubber trees (<i>Hevea brasiliensis</i>) 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 2-5 hectares, these are not part of the scope</p> <p>SBIOCI defines the supply area (supply Base) SBIOCI as the southern districts of Côte d’Ivoire: Montagnes, Sassandra-Marahoué, Bas-Sassandra, Goh-Djiboua, Lagunes, Abidjan and Comoé.</p> <p>The forest law No. 2019-675 of 23th July 2019 classifies forest for protection purposes as A) forêt classée and B) forêt protégée.</p> <p>Within the supply base SODEFOR has registered the following hectares of classified forest for protection purposes (list of forêt classée (A)):</p> <table border="1"> <thead> <tr> <th>Town</th> <th>District</th> <th>Ha</th> </tr> </thead> <tbody> <tr> <td>Abengourou</td> <td>Comoé</td> <td>468.019</td> </tr> <tr> <td>Abidjan</td> <td>Comoé</td> <td>223.589</td> </tr> <tr> <td>Agboville</td> <td>Lagunes</td> <td>230.618</td> </tr> <tr> <td>Daloa</td> <td>Sassandra-Marahoué</td> <td>450.044</td> </tr> <tr> <td>Gagnoa</td> <td>Goh-Djiboua</td> <td>276.082</td> </tr> <tr> <td>Man</td> <td>Montagnes</td> <td>589.776</td> </tr> <tr> <td>San Pedro</td> <td>Bas-Sassandra</td> <td>659.196</td> </tr> <tr> <td>Total</td> <td></td> <td>2.897.324</td> </tr> </tbody> </table> <p>The protected forest (B) include:</p>	Town	District	Ha	Abengourou	Comoé	468.019	Abidjan	Comoé	223.589	Agboville	Lagunes	230.618	Daloa	Sassandra-Marahoué	450.044	Gagnoa	Goh-Djiboua	276.082	Man	Montagnes	589.776	San Pedro	Bas-Sassandra	659.196	Total		2.897.324
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Total		2.897.324																										

	<ul style="list-style-type: none"> • Unclassified forests of the State and local authorities; Forests owned by physical persons; Forests owned by private legal entities; Forest on lands without an owner. • Forests in the rural areas that have not been the subject to an act of classification are protected forest areas subject to a less restrictive legal regime on user rights. <p>Within the supply base SBIOCI defines its scope in primary feedstock from non-forest agro-industrial plantations of rubberwood (<i>Hevea brasiliensis</i>) with a size of 100+ hectares. Other non-forest agro-industrial plantations in Côte d'Ivoire include cocoa, palm oil and cashew plantations, these are not included in the scope.</p> <p>The operations carried out by SBIOCI in the scope is: extraction of stem/branches, chipping of stems/branches at an operational site in the plantation and storage of wood chips in the plantation. The product of the scope is wood chips, only origination from rubberwood, and the product is a by-product from latex production. The scope further includes the transport of the wood chips from the plantation to an intermediary storage site or directly to the port for loading on vessel.</p> <p>SBIOCI can carry out harvesting work directly with its own or subcontracted equipment but under its own responsibility, in which case it has all information necessary at its disposal about the plantation where the work is carried out.</p> <p>The working areas are identified through contracts with the private agro-industrial plantations.</p> <p>SBIOCI ensure that maps of sufficient scale and quality are available, drone maps are preferred.</p> <p>Private agro-industrial plantations are not regulated by the forest act of 2019. Therefore, there are no legal demands for management plans or felling license.</p> <p>However, when transporting log (or sub-products like charcoals, chips, etc.) from one site to another one, documents are required by the forestry administration, specially by the Department in charge of factory matters (DPIF)</p> <p>Given the above background, it is concluded that there is specified risk in relation to the definition and mapping of the supply base.</p>
<p>Means of Verification</p>	<ul style="list-style-type: none"> • The area of operation is known, and maps of appropriate scale are available. • SBIOCI key personnel demonstrate knowledge of the area of operation. • The following documents are available: <ul style="list-style-type: none"> ○ Regional overview of position of the plantation ○ Land title document (Titre foncier / certificat foncier + if available cadastral map) ○ List of areas of forêt classée: http://www.sodefor.ci/pdf/List_fc.pdf
<p>Evidence Reviewed</p>	<ul style="list-style-type: none"> • Cadastre-rural: http://www.foncierural.ci/index.php/cadastre-rural • Drone maps at the appropriate scale are available: https://www.weflyagri.com/en/

	<ul style="list-style-type: none"> • SODEFOR: http://www.sodefor.ci/pdf/List_fc.pdf • http://www.droit-afrique.com/uploads/RCI-Code-2019-forestier.pdf
Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	<ul style="list-style-type: none"> • Drone maps or other maps of sufficient scale and quality. • Contract covering the area of operation. • Land title (Titre foncier / certificat foncier + if available cadastral map). • 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.

	Indicator
1.1.2	Feedstock can be traced back to the defined Supply Base.
Finding	<p>The supply chain for SBIOCI is that logs originating from aged and non-productive rubberwood compartments designated for replanting are extracted and chipped at a central 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. The pile of wood chips is allocated a pile/stack number. 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. Before and after loading the vessel, a draft survey is conducted by an accredited third party to accurately measure the weight of the cargo exported. After final delivery at the power plant, the power plant provides information about final GJ received. SBIOCI invoices according to GJ received by the power plant.</p> <p>Biomass is sold bulk according to vessel size, and each load is estimated ranging between 18.000 MT and 25.000 MT. Wood chips exported meet specifications according to standards used by European power plants.</p> <p>The plantations provide information about the size of the compartments to be harvested and age of feedstock.</p> <p>Côte d’Ivoire has a Corruption Perception index of 35 and is ranked as number 105 out of 180 countries in 2018. The risk of invoices and transport documents being falsified or tampered with is high and consequently documents such as invoices and transport documents cannot be seen as reliable sources of information.</p> <p>Lack of information about documents that should accompany logs or sub-product movement from a place to another one.</p> <p>Given the above background, the risk related to traceability of Primary Feedstock from the rubberwood plantation until loaded on vessel is evaluated as specified risk.</p>
Means of Verification	<ul style="list-style-type: none"> • Low Corruption Perception Index of Côte d’Ivoire • Invoices between plantation owner and BP and between BP and Generator

	<ul style="list-style-type: none"> • Transport/shipping documents • Excel file of truck-logbook with information about origin, species, supplier, carrier. • Waybills • Registration of origin, species, supplier, carrier.
Evidence Reviewed	<ul style="list-style-type: none"> • Transparency International: https://www.transparency.org/country/CI • NEPCon risk assessment of Côte d'Ivoire: https://www.nepcon.org/sourcinghub/timber/timber-cote-divoire
Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	<p>Specified risk regarding traceability from plantation to vessel is mitigated by the following means:</p> <ul style="list-style-type: none"> • 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.

	Indicator
1.1.3	The feedstock input profile is described and categorised by the mix of inputs.
Finding	SBIOCI control system registers every truck that leaves the production site in a truck logbook and by GPS tracking. It is always checked that each truck that leaves the working area enter the storage or port facilities. This check is carried out both by SBIOCI manager in the field and at the port, and also by the plantation supplying the material.

	<p>The only species considered is rubberwood (<i>Hevea brasiliensis</i>) origination from agro-industrial plantations and the biomass that is contractly traded is wood chips.</p> <p>Given the above background, the risk related to this indicator is low.</p>
Means of Verification	<ul style="list-style-type: none"> • Excel file of entries with information about origin, species, supplier, carrier.
Evidence Reviewed	<ul style="list-style-type: none"> • Control record of SBIOCI, entries
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
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.
Finding	<p>Despite the Law of 98/750 dated 23 September 1998 relating to rural land area and law 2013/655 on rural land relating to the extension of the time limit of the establishment of Land Certificates, the registration of land in rural zones has not been successful; such that two systems of land ownership coexist (customary and modern) which put people in risk of being dispossessed from their land.</p> <p>One severe case on displacement of people is in Famienkro/Groumania in Yamoussoukro District, just north of SBIOCI’s supply base, where SIAT, takes over 11.000 hectare of land.</p> <p>On basis of the above SBIOCI assess that there is specified risk that companies did not acquire the land with the rubber plantation through a transparent and legal trade process based on the low 98/750 Dated September 1998</p> <p>Based on the foregoing, the risk related to this indicator is specified risk.</p>
Means of Verification	<ul style="list-style-type: none"> • Existing legislation • Harvest contract • Questionnaires with local communities • Land title (Titre foncier / certificat foncier + if available cadastral map)
Evidence Reviewed	<ul style="list-style-type: none"> • https://www.nepcon.org/sourcinghub/timber/timber-cote-divoire • https://www.grain.org/fr/article/5854-conflit-foncier-en-cote-d-ivoire-les-communautes-se-defendent-face-a-siat-et-l-etat
Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

<p>Comment or Mitigation Measure</p>	<p>The mitigation measures are divided in 3 groups: A. Contract with seller; B Land title document of supplier; C consultation with communities</p> <p>Mitigation measures will be implemented on the supplier</p> <p>Regarding A, Contract with seller:</p> <ul style="list-style-type: none"> • 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. <p>Regarding B, land title document (Titre foncier / certificat foncier + if available cadastral map) of the supplier:</p> <ul style="list-style-type: none"> • Copy of full land title (Titre foncier / certificat foncier + if available cadastral map) 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 <p>Regarding C, consultation with a sample of communities surrounding plantations of the supplier:</p> <ul style="list-style-type: none"> • If the supplier has 1 plantation then the nearest communities shall be consulted. • If the supplier has 2 and up plantations then the nearest communities of the plantation with harvest operation shall be consulted. Furthermore, for each of the plantations without harvest operation the main community will as a minimum be consulted • 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

	Indicator
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.
Finding	<p>As rubberwood will be placed on the EU market by SBIOCI’s clients for the first time, these shall handle a Due Diligence System that prevents illegally harvested timber from entering the EU.</p> <p>SBIOCI will provide EU clients with all information required for EUTR compliance.</p> <p>NEPCon has produced a “Timber Legality Risk Assessment for Côte d’Ivoire” in 2017. The risk score was 9 / 100, the lower a score the more widespread the risks of illegality in the country.</p> <p>FLECT. As part of a broad effort to improve governance in the country, Côte d’Ivoire has taken a series of steps to improve governance of its forest sector. In addition to reforms in forest law, in 2013, Côte d’Ivoire entered the process of negotiating a Voluntary Partnership Agreement (VPA) with the European Union. Since that time, two formal negotiation sessions have taken place, in addition to regular technical missions and exchanges, and substantial advances at the national level. The latest meeting in the FLECT committee in Côte d’Ivoire was in August 2019.</p> <p>Cote d’Ivoire has a Corruption Perception index of 35 and is ranked as number 105 out of 180 countries in 2018.</p> <p>Based on the foregoing there is specified risk for this indicator.</p>
Means of Verification	<ul style="list-style-type: none"> • Existing legislation • Implemented EUTR DDS system • Managers well trained in handling the SBP mitigation measures • Land title (Titre foncier / certificat foncier + if available cadastral map)
Evidence Reviewed	<ul style="list-style-type: none"> • EUTR DDS for rubberwood: https://europa.eu/capacity4dev/file/11852/download?token... • NEPCon sourcing hub methodology: https://www.nepcon.org/sourcinghub/info/timber-risk-assessment-methodology • NEPCon risk assessment of Côte d’Ivoire: https://www.nepcon.org/sourcinghub/timber/timber-cote-divoire • EUFLEGT progress: http://www.euflegt.efi.int/cote-ivoire • Transparency International: https://www.transparency.org/country/CIV
Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA

Comment or Mitigation Measure	The SBP Risk Assessment and all Mitigation Measures will serve as SBIOCI’s EUTR DDS system for European clients
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	Indicator
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.
Finding	<p>NEPCon address the legality of ownership and land use in the “Timber Legality Risk Assessment – Côte d’Ivoire” which was elaborated in 2017.</p> <p>Payment of royalties and harvesting fees; is not relevant for harvest of rubberwood at agro-industrial plantations.</p> <p>Payment of value added taxes and other sales taxes: Woodchips destined to be sold abroad are <u>not</u> subject to DUS (Droit Unique de Sortie – single exit tax).</p> <p>Collection of value added tax, in Côte d’Ivoire is done, unhindered, by the tax administration services.</p> <p>Payment of income and profit taxes The paying of taxes is done regularly by the operators because it is part of the requirements to be able to resume work. NEPCon assess that there is low risk on this indicator in their Timber Legality Risk Assessment for Cote d’Ivoire.</p> <p>Rural Development Rubber plantations shall pay an annual amount of 300 FCFA (0,46€) per hectare for the harvested compartment for rural development.</p> <p>Risk conclusion: Based on the foregoing SBIOCI assess that there is low risk related to the plantation not paying the 300 FCFA (0,46€) per hectare for the harvested compartment as the amount is very small and there is low risk for the other duties, royalties and taxes related to the harvested area.</p>
Means of Verification	<ul style="list-style-type: none"> Records of payments
Evidence Reviewed	<ul style="list-style-type: none"> NEPCon risk assessment of Côte d’Ivoire: https://www.nepcon.org/sourcinghub/timber/timber-cote-divoire SBIOCI correspondence with tax authorities
Risk Rating	<p><input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>
Comment or Mitigation Measure	

	Indicator
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.
Finding	<p>SBIOCI only harvest, chip and trade rubberwood (<i>Hevea brasiliensis</i>). Rubberwood is not found on the CITES list Appendix I, II or III.</p> <p>A range of other amphibia, plants and trees are however found on CITES and IUCN list for Côte d'Ivoire:</p> <ul style="list-style-type: none"> - Ivory Coast Toad, <i>Sclerophrys danielae</i> – data deficient - Ivory Coast Frog, <i>Amnirana occidentalis</i> - least concern - Ivory Coast Running Frog, <i>Kassina arboricola</i> - vulnerable - Ivory Coast Wart Frog, <i>Acanthixalus sonjae</i>- vulnerable - Ivory Coast Snake-eater, <i>Polemon neuwiedi</i> - least concern - Behan, <i>Berlinia occidentalis</i> - vulnerable - Bois de Rose, <i>Berlinia confusa</i> - least concern - Cedarwood, <i>Cedrela odorata</i> – CITES LISTED - Rosewood, <i>Dalbergia spp</i> – CITES listed - Black ebony - <i>Diospyros ferrea</i> – CITES listed - Barwood, muninga, vène and mikwa - <i>Pterocarpus erinaceus</i> – CITES listed - Afromosia, African teak, satinwood - <i>Pericopsis elata</i> – CITES listed <p>SBIOCI consider specified risk for conversion of forest to rubber plantation, see indicator 2.1.3. CITES species are likely to be present in forests converted to plantation and therefore the risk is specified if the supplier is involved in conversion.</p> <p>Based on the foregoing the risk related to this indicator is specified risk</p>
Means of Verification	<ul style="list-style-type: none"> • List of species included in the raw material: Rubberwood.
Evidence Reviewed	<p>Check list of CITES species: http://checklist.cites.org/#/en</p> <p>IUCN redlist: https://www.iucnredlist.org/</p>
Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	<p>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.</p> <p>Mitigation measures will be implemented on the supplier.</p> <p>Within each group indications of conversions will be analysed. The groups are analysed in the following order.</p> <p>8. CONTRACT (A) If contract negotiations initially lead to no indications of conversion continue to 2.</p>

9. TITRE FONCIER (B) If inspection of titre foncier + cadastral map lead to no indication of conversion continue to 3.
10. HISTORICAL REPORTS AND MAPS (C) if inspection of historical reports and maps lead to no indication of conversion continue to 4.
11. CONSULTATION WITH COMMUNITIES (E) if consultation with communities lead to no indication of conversion continue to 5.
12. CONSULTATION WITH MANAGEMENT. The management is questioned about indications found during step 2-4, if management by document can support that there is low risk related to the indications then SBIOCI assess low risk for conversion. If documentation is weak continue to 6 and/or 7.
13. FIELD inspections (D). If no indications are found for conversion it is concluded that there is low risk of conversion.
14. AGROFORESTRY/OTHER MANAGED LAND INVESTIGATION. If there is uncertainty about conversion of agroforestry/other managed land versus forested land this shall be investigated and documented i) by community consultations (E); ii) by examining available reports of impact assessment and similar and iii) by interviewing staff in the environmental department (or similar) about the former status of the land. If investigations and documentation conclude that agroforested/other managed land has been converted then the overall conclusion is low risk of conversion. If investigations and documentation conclude that forest has been converted then the overall conclusion is exclusion of 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 + if available cadastral map) of the supplier:

- Copy of full land title (Titre foncier / certificat foncier + if available cadastral map) 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	Replanted area (ha)	Expansion of plantation (ha)	Total (ha)
Year							

	(1)	(2)	(3)	factory (ha) (4)	(5)	(6)	(7)
2008							
2015							
Present							

Indications for conversion 1: decline in Forêt classée, biodiversity area, forest area.

Indications for conversion 2: expansion in rubber plantation; other agricultural area; housing and factory area

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)
- Indications of low risk: Landuse of neighbouring land in 2008, agriculture or plantation with rubber, oil palm, cocoa, cashew.
- Indications of conversion: Landuse of neighbouring land in 2008: forestry; tree stumps inside plantation with diameter of 80+ cm’s

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

- If the supplier has 1 plantation then the nearest communities shall be consulted.
- If the supplier has 2 and up plantations then the nearest communities of the plantation with harvest operation shall be consulted. Furthermore, for each of the plantations without harvest operation the main community will as a minimum be consulted
- 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.
- Low risk indications for conversion: use as farmland or agroforestry (e.g. with cocoa, cashew, oil palm trees in combination with agriculture), sale of non-forest products.
- Indications of conversion: independent memories of the same specified forested land allocations being converted after 2008.

	<ul style="list-style-type: none"> • 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 <p>Conversion of rubber plantations or compartments to urban development projects will be assessed by:</p> <ul style="list-style-type: none"> • 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.
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	Indicator
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.
Finding	<p>Indigenous people are not recognized by law in Côte d'Ivoire as they are not present in the country. Only local communities are recognized.</p> <p>On land with no title of ownership, the ownership of the trees is held by the State, and benefits of harvesting are redistributed to the rural populations via the general interest tax (TIG) and the Rural Development Contribution (CDR) paid by loggers operating on those lands. However, while the payment of the TIG is carried out unhindered, the CDR payment that is meant to flow back to the local communities who are directly affected by the logging, is not always made by the loggers.</p> <p>In rural forest areas, the local population are exercising their customary rights unhindered by the loggers. However, in State production areas, restrictions to use rights are imposed under this type of forest classification often create tensions with the populations who</p>

	<p>believe they are the victims of the monopolisation of their land by the forest managers. This often leads to cases of invasions and deforestation of parcels inside the State production forests by locals in order to grow cash crops (coffee, cocoa, palm oil etc.) and subsistence crops (corn, rice, etc.), to hunt, etc. In most cases the forest manager is not guilty of illegal practices, but is perceived as such by the local population, whose expectations with regards to their use rights on state production forests may be legitimate, but not recognised by law.</p> <p>On basis of the above SBIOCI assess that there is risk of violation of traditional or civil rights if companies did not acquire the land with the rubber plantation through a transparent and legal trade process based on the low 98/750 Dated September 1998</p> <p>Based on the foregoing the risk related to this indicator is specified risk</p>
<p>Means of Verification</p>	<ul style="list-style-type: none"> • Contract • Questionnaires • Land title (Titre foncier / certificat foncier + if available cadastral map) • Communication with local communities
<p>Evidence Reviewed</p>	<ul style="list-style-type: none"> • NEPCon risk assessment of Côte d'Ivoire: https://www.nepcon.org/sourcinghub/timber/timber-cote-divoire • https://www.grain.org/fr/article/5854-conflit-foncier-en-cote-d-ivoire-les-communautes-se-defendent-face-a-siat-et-l-etat
<p>Risk Rating</p>	<p><input type="checkbox"/> Low Risk X Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>
<p>Comment or Mitigation Measure</p>	<p>The mitigation measures are divided in 3 groups: A. Contract with seller; B Land title document of supplier; C consultation with communities</p> <p>Mitigation measures will be implemented on the supplier</p> <p>Regarding A, Contract with seller:</p> <ul style="list-style-type: none"> • 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. <p>Regarding B, land title document (Titre foncier / certificat foncier + if available cadastral map) of the supplier:</p> <ul style="list-style-type: none"> • Copy of full land title (Titre foncier / certificat foncier + if available cadastral map) 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 • <p>Regarding C, consultation with a sample of communities surrounding plantations of the supplier:</p> <ul style="list-style-type: none"> • If the supplier has 1 plantation then the nearest communities shall be consulted.

	<ul style="list-style-type: none"> • If the supplier has 2 and up plantations then the nearest communities of the plantation with harvest operation shall be consulted. Furthermore, for each of the plantations without harvest operation the main community will as a minimum be consulted. • 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
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	Indicator
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.
Finding	<p>The agro-industrial rubberwood plantations are monocultures without woodlot areas set aside inside the compartments and no forest or High Conservation Values exist. The plantations are comparable to agricultural fields of wheat.</p> <p>Therefore, there are no forest or High Conservation Values to conserve.</p> <p>A doctor dissertation on Rubberwood plantations and biodiversity from Greater Mekong support the finding and they conclude that their findings are transferable to Côte d'Ivoire. Other references have the same findings.</p> <p>The Global Platform for Sustainable Natural Rubber (GPSNR), which is led by producers, processors, traders, tire makers and civil society have a working group working with "Sustainability Policy Toolbox and Best Practice Guidance" to be considered by their AGM in 2020.</p>

	Based on the foregoing the risk related to this indicator is low risk
Means of Verification	<ul style="list-style-type: none"> • Research references • On-site inspections
Evidence Reviewed	<ul style="list-style-type: none"> • Häuser, I. (2017) Impact of rubber tree dominated land-use on biodiversity and ecosystem services in the Greater Mekong Subregion. Faculty of Agricultural Sciences, University of Hohenheim, Germany. • Pia, H., and Konrad, M. (2015). Effects of rubber cultivation on biodiversity in the Mekong region. CAB Rev. 10, 1–7. doi: 10.1079/PAVSNR201510044 • Tondoh JE, Dimobe K, Guéi AM, Adahe L, Baidai Y, N'Dri JK and Forkuor G (2019) Soil Health Changes Over a 25-Year Chronosequence From Forest to Plantations in Rubber Tree (<i>Hevea brasiliensis</i>) Landscapes in Southern Côte d'Ivoire: Do Earthworms Play a Role? <i>Front. Environ. Sci.</i> 7:73. doi: 10.3389/fenvs.2019.00073 • GPSNR https://www.gpsnr.org/news-publications/strategy-and-objectives-working-group-update-august-2019
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
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.
Finding	<p>The agro-industrial rubberwood plantations are monocultures without woodlot areas set aside inside the compartments and no forest or High Conservation Values exist. The plantations are comparable to agricultural fields of wheat.</p> <p>Therefore, there are no forest or High Conservation Values to conserve.</p> <p>A doctor dissertation on Rubberwood plantations and biodiversity from Greater Mekong support the finding and they conclude that their findings are transferable to Côte d'Ivoire. Other references have the same findings.</p> <p>The Global Platform for Sustainable Natural Rubber (GPSNR), which is led by producers, processors, traders, tire makers and civil society have a working group working with “Sustainability Policy Toolbox and Best Practice Guidance” to be considered by their AGM in 2020.</p> <p>Based on the foregoing the risk related to this indicator is low risk</p>

Means of Verification	<ul style="list-style-type: none"> • Research references • On-site inspections
Evidence Reviewed	<ul style="list-style-type: none"> • Häuser, I. (2017) Impact of rubber tree dominated land-use on biodiversity and ecosystem services in the Greater Mekong Subregion. Faculty of Agricultural Sciences, University of Hohenheim, Germany. • Pia, H., and Konrad, M. (2015). Effects of rubber cultivation on biodiversity in the Mekong region. CAB Rev. 10, 1–7. doi: 10.1079/PAVSNNR201510044 • Tondoh JE, Dimobe K, Guéi AM, Adahe L, Baidai Y, N'Dri JK and Forkuor G (2019) Soil Health Changes Over a 25-Year Chronosequence From Forest to Plantations in Rubber Tree (<i>Hevea brasiliensis</i>) Landscapes in Southern Côte d'Ivoire: Do Earthworms Play a Role? <i>Front. Environ. Sci.</i> 7:73. doi: 10.3389/fenvs.2019.00073 • GPSNR https://www.gpsnr.org/news-publications/strategy-and-objectives-working-group-update-august-2019
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
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.
Finding	<p>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 app. 3.4 million hectare 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</p> <p>REDD+ (2017) cite the most important <u>direct</u> drivers of deforestation and forest degradation as:</p> <ul style="list-style-type: none"> • the expansion of agriculture especially for the establishment of cash crops (cocoa, rubber, oil palm) and itinerant food crops (rice, yam); • the exploitation of wood energy; • uncontrolled land use beyond their regenerative capacity; • and uncontrolled bush fires.

	<p>Area occupied by rubberwood plantation has been growing steadily since 2010 – as measured by FAO statistics by the size of annual harvested area. The increasing area has been supported by steady prices on the rubber latex. The production of latex was estimated at 800.000 tons in 2018 and forecasts for 2023 are 2 million tons. Prices are however fluctuating causing producers to plant, but also to convert plantations into non-forest lands.</p> <p>Conversion of rubber plantations or compartments to urban development projects are in the scope of this indicator too. Conversion of rubber plantations may be motivated by various factors, such as housing, industrial grounds, logistics centres with various positive or negative effects on the environment. Overall the rubber plantations or compartments which are considered for urban development projects are at risk of originating from converted forest after 2008 too.</p> <p>Risk Assessment On the basis of data for accelerated deforestation in Côte d'Ivoire there is specified risk that rubber plantation suppliers have been engaged in conversion after January 2008.</p>
<p>Means of Verification</p>	<ul style="list-style-type: none"> • Reports on deforestation • Historical maps, reports and enquiries with stakeholders • Tree diameter and growth schemes for rubberwood
<p>Evidence Reviewed</p>	<ul style="list-style-type: none"> • REDD+ (2017) : Données Forestières de Base Pour La REDD+ en Côte d'Ivoire – Inventaire de la biomasse forestière pour l'estimation des facteurs d'émission. L'organisation des Nations Unies pour l'alimentation et l'agriculture, Abidjan 2017 • FAO et SEPREDD+, (2017): Données Forestières de base pour la REDD+ en Côte d'Ivoire. Cartographie de la dynamique forestière de 1986 à 2015 • http://www.commodafrica.com/23-10-2018-irc-2018-la-production-de-caoutchouc-en-cote-divoire-triplera-dici-2023-2-mt • http://www.aidenvironment.org/wp-content/uploads/2016/10/Rubber-study-FRA.pdf • https://www.frontiersin.org/articles/10.3389/fenvs.2019.00073/full
<p>Risk Rating</p>	<p><input type="checkbox"/> Low Risk X Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>
<p>Comment or Mitigation Measure</p>	<p>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.</p> <p>Mitigation measures will be implemented on the supplier.</p> <p>Within each group indications of conversions will be analysed. The groups are analysed in the following order.</p> <ol style="list-style-type: none"> 1. CONTRACT (A) If contract negotiations initially lead to no indications of conversion continue to 2. 2. TITRE FONCIER (B) If inspection of titre foncier + cadasteral map lead to no indication of conversion continue to 3. 3. HISTORICAL REPORTS AND MAPS (C) if inspection of historical reports and maps lead to no indication of conversion continue to 4. 4. CONSULTATION WITH COMMUNITIES (E) if consultation with communities lead to no indication of conversion continue to 5.

5. CONSULTATION WITH MANAGEMENT. The management is questioned about indications found during step 2-4, if management by document can support that there is low risk related to the indications then SBIOCI assess low risk for conversion. If documentation is weak continue to 6 and/or 7.
6. FIELD inspections (D). If no indications are found for conversion it is concluded that there is low risk of conversion.
7. AGROFORESTRY/OTHER MANAGED LAND INVESTIGATION. If there is uncertainty about conversion of agroforestry/other managed land versus forested land this shall be investigated and documented i) by community consultations (E); ii) by examining available reports of impact assessment and similar and iii) by interviewing staff in the environmental department (or similar) about the former status of the land. If investigations and documentation conclude that agroforested/other managed land has been converted then the overall conclusion is low risk of conversion. If investigations and documentation conclude that forest has been converted then the overall conclusion is exclusion of 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 + if available cadastral map) of the supplier:

- Copy of full land title (Titre foncier / certificat foncier + if available cadastral map) 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							

Indications for conversion 1: decline in Forêt classée, biodiversity area, forest area.

Indications for conversion 2: expansion in rubber plantation; other agricultural area; housing and factory area

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)
- Indications of low risk: Landuse of neighbouring land in 2008, agriculture or plantation with rubber, oil palm, cocoa, cashew.
- Indications of conversion: Landuse of neighbouring land in 2008: forestry; tree stumps inside plantation with diameter of 80+ cm’s

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

- If the supplier has 1 plantation then the nearest communities shall be consulted.
- If the supplier has 2 and up plantations then the nearest communities of the plantation with harvest operation shall be consulted. Furthermore, for each of the plantations without harvest operation the main community will as a minimum be consulted
- 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.
- Low risk indications for conversion: use as farmland or agroforestry (e.g. with cocoa, cashew, oil palm trees in combination with agriculture), sale of non-forest products.
- Indications of conversion: independent memories of the same specified forested land allocations being converted after 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.

	<ul style="list-style-type: none"> • 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 <p>Conversion of rubber plantations or compartments to urban development projects will be assessed by:</p> <ul style="list-style-type: none"> • 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.

	Indicator
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.
Finding	<p>Rubberwood plantations are considered non-forest plantations and are generally not controlled by the forest codes of 2014 or 2019. There are however classified or protected forest areas either isolated to compartments and protected as such inside the plantations or located in the neighbourhood to the plantation.</p> <p>The environment of the plantations is governed by the decree 96-894 of November the 8th 1996, the decree states that clearing of and projects of uncultivated land or semi-natural intensive farming with an area of over 999 ha require an Environmental Impact Assessment. Further, the following areas, appointed for harvest and replanting will also require an EIA:</p> <ul style="list-style-type: none"> • Protected areas and similar reserves; • Wet areas and mangroves • Areas of scientific, cultural, tourist interest; • Ecologically sensitive defined areas; • Protected perimeters around water points <p>The areas mentioned above are together with classified and protected forest areas found in designated compartments set aside outside the actual rubberwood production compartments or located in the neighbourhood to the plantation. The location of the areas is known to the managers of the plantations.</p>

	<p>As part of the preparation of harvesting procedures APROMAC and two large scale industrial plantation were contacted and visited to evaluate if they were aware of the decree 96-894 or, if they in other ways had plans in place to prevent impact from harvesting and systems to monitor the impact. Several positive measures on the ground were observed:</p> <ul style="list-style-type: none"> • the stacking of roots along contour lines to prevent soil erosion • turning trees over outside the rainy periods, to prevent soil erosion and to minimize damage from machinery on soils, terraces etc. • planting along contour lines also to minimize soil erosion and • sowing of weeds in between the rows to prevent erosion. <p>It is assessed that there is limited knowledge about requirements of EIA in decree 96-894.</p> <p>The major impact risk from harvesting operation was found to be soil erosion and concerns of pesticide runoff.</p> <p>It was observed that some erosion happens along the major roads inside the plantation and that artificial ditches to some extent offset the problem. The volume of rain runoff water can be heavy and will be stronger downstream of harvesting operations of up to 100 hectares and will mix with pesticides from the compartments. Some water pass through villages, some pass through forests and biodiversity areas putting humans as well as biodiversity at risk.</p> <p>It is further assessed that there is risk of general maintenance intervals of machinery, as maintenance does not happen regularly and that there is risk of pollution with different machinery oils.</p> <p>Risk Assessment</p> <p>There is limited knowledge about decree 96-894 but a good range of measures are used to prevent environmental impacts of harvesting activities in the plantations. But, rain runoff water mix with pesticides and there is risk of putting humans as well as biodiversity at risk. Further there is risk of pollution due to irregular maintenance of machinery. On this basis the indicator is assessed as specified risk.</p>
<p>Means of Verification</p>	<ul style="list-style-type: none"> • EIA reports • Assessment of impact at operational level for every selected compartment • Assessment of measures to minimise impacts • Supply contracts • Existing legal framework and legal governance • Publicly available information on protecting the values identified
<p>Evidence Reviewed</p>	<ul style="list-style-type: none"> • Ministry of Agriculture http://www.agriculture.gouv.ci/accueil/details_actualite/cote-d-ivoire-vers-l-operationnalisation-de-la-filiere-hevea-palmier-a-huile-gouvernement794 • APROMAC http://apromac.ci/ • Decret no 96-894 on Environmental Impact Assessment http://anasur.salubrite.gouv.ci/fichiers/1333529754DECRET%20N%2096-894%20DU%2008%20NOVEMBRE%201996%20DETERMINANT%20LES%20REGLES%20ET%20PROCEDURES%20DEIE.pdf • http://www.fao.org/3/t1765e/t1765e0p.htm • http://web2.uwindsor.ca/courses/earth_science/hudec/nigeria/Inclination%20of%20slope.htm

Risk Rating	<input type="checkbox"/> Low Risk	<input checked="" type="checkbox"/> Specified Risk	<input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	<p>The mitigation measures are divided in 4 groups: A. Contract with seller; B. Elevation; C. WHO pesticides; D. Maintenance intervals</p> <p>Mitigation measures will be implemented on the harvesting operation</p> <p>Regarding A, contract with seller:</p> <ul style="list-style-type: none"> • 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 it's best to prevent oil spills, minimize damage to soil and protect buffer zones. SELLER mitigate 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 <p>Regarding B, Slope gradient and erosion</p> <ul style="list-style-type: none"> • 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 (<math>3^{\circ}</math>); 2, moderate slopes (<math>3^{\circ}</math>-<math>10^{\circ}</math>) moderate risk of gully erosion and 3. steep slopes (<math>10</math>-<math>20^{\circ}</math>) 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 : <ul style="list-style-type: none"> - Near flat (<math>3^{\circ}</math>): sheet erosion can take place, but acceleration is not likely - Moderate (<math>3^{\circ}</math>-<math>10^{\circ}</math>): prevention of erosion control measures is needed - Steep (<math>10</math>-<math>20^{\circ}</math>) : planning is crucial, high risk of gully erosion • On-site inspection by forester or biologist, classifying level of elevation <ul style="list-style-type: none"> ○ Erosion prevention moderate terrain: roots are piled in long rows along the rows of the new trees. ○ Erosion prevention moderate and steep terrain: At preharvest meeting it is clarified that piling of roots has to happen immediately following the completion 		

	<p>of the harvest and that the turning over of the old plantation is max 2 weeks ahead.</p> <ul style="list-style-type: none"> ○ 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 <ul style="list-style-type: none"> ● 3 days of rain => skidding stops <p>Regarding C, pesticides</p> <ul style="list-style-type: none"> ● 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. <ul style="list-style-type: none"> ○ 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. <p>Regarding D, maintenance of machinery</p> <ul style="list-style-type: none"> ● Maintenance schedule ● Registration of maintenance
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	Indicator
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).
Finding	<p>Realizing that there are differences in flora, fauna, ecosystems and habitats, a qualified (similar rainfall, cultivation between 10° South and 10 ° North) reference discovered for this indicator is a doctoral dissertation from 2017 on “Impact of rubber tree dominated land-use on biodiversity and ecosystem services in the Greater Mekong Subregion GMS”. The dissertation not only analyse impact in GMS but also consider transferability of place-based research to other regions of the world including Africa. The dissertation concludes that the transferability of GMS to other areas is high with high scores of statistical similarity.</p> <p>The finding from the dissertation is:</p> <ul style="list-style-type: none"> Concerning erodibility, rubber plantations increase the soil erosion risk compared to natural forests (magnitude depends on management options such as weeding and terracing). <p>Based on the foregoing the risk related to this indicator is specified risk</p>
Means of Verification	<ul style="list-style-type: none"> Regional Best Management Practices Field inspections Supply contract Doctor dissertation from Greater Mekong Subregion The dissertation conclude the transferability of GMS to other areas, including Africa, is high with high scores of statistical similarities
Evidence Reviewed	<ul style="list-style-type: none"> Häuser, I. (2017) Impact of rubber tree dominated land-use on biodiversity and ecosystem services in the Greater Mekong Subregion. Faculty of Agricultural Sciences, University of Hohenheim, Germany. http://www.fao.org/3/t1765e/t1765e0p.htm http://web2.uwindsor.ca/courses/earth_science/hudec/nigeria/Inclination%20of%20slope.htm
Risk Rating	<input type="checkbox"/> Low Risk X Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	<p>The mitigation measures are divided in 2: A. Contract with seller and B. Slope gradient and erosion</p> <p>Mitigation measures will be implemented on the plantation</p> <p>Regarding A contract with seller</p> <ul style="list-style-type: none"> 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. <p>Regarding B, Slope gradient and erosion</p>

	<ul style="list-style-type: none"> • 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 (<math><3^{\circ}</math>) ; 2, moderate slopes (<math>3^{\circ}</math>-<math>10^{\circ}</math>) moderate risk of gully erosion and 3. steep slopes (<math>10</math>-<math>20^{\circ}</math>) 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 : <ul style="list-style-type: none"> ○ Near flat (<math><3^{\circ}</math>): sheet erosion can take place, but acceleration is not likely ○ Moderate (<math>3^{\circ}</math>-<math>10^{\circ}</math>): prevention of erosion control measures is needed ○ Steep (<math>10</math>-<math>20^{\circ}</math>) : planning is crucial, high risk of gully erosion • On-site inspection by forester or biologist, classifying level of elevation <ul style="list-style-type: none"> ○ Erosion prevention moderate terrain: roots are piled in long rows along the rows of the new trees. ○ Erosion prevention moderate and steep terrain: At preharvest meeting it is clarified that piling of roots has to happen immediately following the completion of the harvest and that the turning over of the old plantation is max 2 weeks ahead. ○ 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. 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 • 3 days of rain => skidding stops
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	Indicator
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).
Finding	<p>The agro-industrial rubberwood plantations are monocultures without woodlot areas set aside inside the compartments to ensure conservation of key ecosystems and habitats in any form. The plantations are comparable to agricultural fields of wheat.</p> <p>Therefore, there are no key ecosystems or habitats to conserve.</p> <p>A doctor dissertation on Rubberwood plantations and biodiversity from Greater Mekong support the finding and they conclude that their findings are transferable to Côte d'Ivoire. Other references have the same findings.</p> <p>The Global Platform for Sustainable Natural Rubber (GPSNR), which is led by producers, processors, traders, tire makers and civil society have a working group working with "Sustainability Policy Toolbox and Best Practice Guidance" to be considered by their AGM</p>

	<p>in 2020. This will not have an immediate effect on the non-existence of ecosystems or habitats to conserve but will hopefully have an effect in 5-10 years.</p> <p>Based on the foregoing the risk related to this indicator is low risk</p>
Means of Verification	<ul style="list-style-type: none"> • Research references • On-site inspections
Evidence Reviewed	<ul style="list-style-type: none"> • Häuser, I. (2017) Impact of rubber tree dominated land-use on biodiversity and ecosystem services in the Greater Mekong Subregion. Faculty of Agricultural Sciences, University of Hohenheim, Germany. • Pia, H., and Konrad, M. (2015). Effects of rubber cultivation on biodiversity in the Mekong region. CAB Rev. 10, 1–7. doi: 10.1079/PAVSNNR201510044 • Tondoh JE, Dimobe K, Guéi AM, Adahe L, Baidai Y, N'Dri JK and Forkuor G (2019) Soil Health Changes Over a 25-Year Chronosequence From Forest to Plantations in Rubber Tree (<i>Hevea brasiliensis</i>) Landscapes in Southern Côte d'Ivoire: Do Earthworms Play a Role? <i>Front. Environ. Sci.</i> 7:73. doi: 10.3389/fenvs.2019.00073 • GPSNR https://www.gpsnr.org/news-publications/strategy-and-objectives-working-group-update-august-2019
Risk Rating	<p><input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>
Comment or Mitigation Measure	

	Indicator
2.2.4	The Biomass Producer has implemented appropriate control systems and procedures to ensure that biodiversity is protected (CPET S5b).
Finding	<p>The agro-industrial rubberwood plantations are monocultures without woodlot areas set aside inside the compartments to ensure biodiversity in any form. The plantations are comparable to agricultural fields of wheat.</p> <p>Therefore, there is no key biodiversity to protect.</p> <p>A doctor dissertation on Rubberwood plantations and biodiversity from Greater Mekong support the finding and they conclude that their findings are transferable to Côte d'Ivoire. Other references have the same findings.</p> <p>The Global Platform for Sustainable Natural Rubber (GPSNR), which is led by producers, processors, traders, tire makers and civil society have a working group working with “Sustainability Policy Toolbox and Best Practice Guidance” to be considered by their AGM in 2020. This will not have an immediate effect on the non-existence of ecosystems or habitats to conserve but will hopefully have an effect in 5-10 years.</p>

	Based on the foregoing the risk related to this indicator is low risk
Means of Verification	<ul style="list-style-type: none"> • Research references • On-site inspections
Evidence Reviewed	<ul style="list-style-type: none"> • Häuser, I. (2017) Impact of rubber tree dominated land-use on biodiversity and ecosystem services in the Greater Mekong Subregion. Faculty of Agricultural Sciences, University of Hohenheim, Germany. • Pia, H., and Konrad, M. (2015). Effects of rubber cultivation on biodiversity in the Mekong region. CAB Rev. 10, 1–7. doi: 10.1079/PAVSNNR201510044 • Tondoh JE, Dimobe K, Guéi AM, Adahe L, Baidai Y, N'Dri JK and Forkuor G (2019) Soil Health Changes Over a 25-Year Chronosequence From Forest to Plantations in Rubber Tree (<i>Hevea brasiliensis</i>) Landscapes in Southern Côte d'Ivoire: Do Earthworms Play a Role? <i>Front. Environ. Sci.</i> 7:73. doi: 10.3389/fenvs.2019.00073 • GPSNR https://www.gpsnr.org/news-publications/strategy-and-objectives-working-group-update-august-2019
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
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.
Finding	<p>Generally, the plantations are poor in term of quality of ecosystem and the removal of residue will not harm the quality of the ecosystems. Leaving the residue will increase the risk of fungus attacks which potentially is dangerous to the entire plantation. Leaving the trees inside the compartments would be better for the ecosystem than extracting them, but attacks of fungus would in this way endanger the entire plantation. Therefore, the removal of the stems and branches (estimated at app. 2/3 of the biomass) is necessary for the plantation to survive.</p> <p>Roots (estimated at app. 1/3 of the biomass) of overturned trees left in the plantation improve the ecosystem slightly if left in the compartments in a manner where they can be protected from fungus attacks. Some plantations do this systematically and pile the roots in rows along the planting lines and cover the roots with a minor layer of soil to prevent fungus problems for the new trees.</p> <p>Based on the foregoing the risk related to this indicator is specified risk as there are no regulations focusing on the improvement of the ecosystem of the plantation</p>
Means of Verification	<ul style="list-style-type: none"> • Regional Best Management Practices • Field inspections

	<ul style="list-style-type: none"> Contract
Evidence Reviewed	<ul style="list-style-type: none"> On-site plantation visits Internet search https://www.reuters.com/article/us-thailand-rubber/top-rubber-producer-thailand-hit-by-fungal-disease-outbreak-idUSKBN1X0118 http://www.bernama.com/en/news.php?id=1787033
Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	<p>The mitigation measures are divided in 3: A. Contract with seller; B. Pre-harvest meeting; C. Post-harvest control</p> <p>Mitigation measures will be implemented on the plantation</p> <p>Regarding A, contract with seller</p> <ul style="list-style-type: none"> SELLER guarantees, that roots not extracted are not burned but left to rot and decay. <p>Regarding B, preharvest meeting</p> <ul style="list-style-type: none"> Preharvest meeting, training to leave the roots in the plantation Signed instruction document <p>Regarding C, post-harvest control</p> <ul style="list-style-type: none"> On-site inspection, confirming that roots are left in piles covered with a minor layer of soil. Signed report

	Indicator
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).
Finding	<p>Rubber plantations are in general equipped with artificial ditches established in order to control surface water and to enable the daily collection of latex. The ditches are maintained on a periodically basis.</p> <p>For the water bodies in the landscape there is risk that management does not protect these as the riparian vegetation is cut together with overturning of the rubberwood.</p> <p>Côte d'Ivoire has recently engaged in a pesticide management plan. However, there is still a risk of use of WHO 1A and 1B pesticides.</p>

	<p>Risk description and conclusion</p> <p>Due to the risk of pesticides being washed out with surface water along the ditches, and the risk of pesticides being 1A or 1B categorized on WHO pesticide list, the indicator is assessed as specified risk.</p>
<p>Means of Verification</p>	<ul style="list-style-type: none"> • Contract • Regional Best Management Practices • Field inspection with the purpose of registering water bodies, forests, ditches, slope gradients.
<p>Evidence Reviewed</p>	<ul style="list-style-type: none"> • Programme de Transformation de l’agriculture en Afrique de l’ouest, plan de gestion de pestes. Ministere de l’agriculture et du développement rural. 2018 • Field inspections
<p>Risk Rating</p>	<p><input type="checkbox"/> Low Risk X Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>
<p>Comment or Mitigation Measure</p>	<p>The mitigation measures are divided in 4: A. Contract with seller; B. WHO pesticides; C. Preharvest meeting; D. Post-harvest control</p> <p>Mitigation measures will be implemented on the plantation</p> <p>Regarding A, contract with seller</p> <ul style="list-style-type: none"> • 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. <p>Regarding B, pesticides</p> <ul style="list-style-type: none"> • 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. <ul style="list-style-type: none"> ○ 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.

	<ul style="list-style-type: none"> Monitoring of impact of the mitigation measure: future registration of 1A and 1B pesticides when the plantation is re-visited for another harvesting operation. <p>Regarding C, preharvest meeting</p> <ul style="list-style-type: none"> 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. <p>Regarding D, Post-harvest</p> <ul style="list-style-type: none"> Check ditches Check damage to 10m no-cut zone Check damage to riparian, protected or biodiversity zones
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	Indicator
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.
Finding	<p>During the last approximately 10 years plantations have become more and more aware of not burning the rubberwood by selling as much as possible as firewood to local communities. But getting a temperature which is high enough to get a clean combustion is difficult and local communities as well as the plantations have suffered due to the evaporation of un-combusted smoke. For this reason, open burning of rubberwood residue is banned by most plantations, but there are no specific regulation governing this.</p> <p>The chipping, drying and burning and high temperature in big scale generator will be an improvement to the environment.</p> <p>On the basis that there are is no regulation banning the burning of rubberwood residue the indicator is assessed as specified risk.</p>
Means of Verification	<ul style="list-style-type: none"> Contract Old fireplaces inside the plantation Regional Best Management Practices
Evidence Reviewed	<ul style="list-style-type: none"> United Nations Environmental Program Consultation with plantations
Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	<p>The mitigation measures are divided in 3: A. Contract with seller; B. Extraction of biomass; C. Post-harvest control;</p> <p>Mitigation measures will be implemented on the plantation</p> <p>Regarding A, contract with seller</p>

	<ul style="list-style-type: none"> • SELLER guarantees, that roots not extracted are not burned but left to rot and decay. <p>Regarding B, extraction of biomass</p> <ul style="list-style-type: none"> • SBIOCI’s business is extraction, chipping, transporting to large scale generator for a clear combustion with as high an energy efficiency as possible. <p>Regarding C, post-harvest control</p> <ul style="list-style-type: none"> • 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 the this. Upon reoccurrence the supplier will be excluded.
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	Indicator
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).
Finding	<p>Description of situation</p> <p>The ministry of agriculture and development launched their plan for management of pesticides in 2018. The policy, legal and institutional framework for pesticide management is relatively extensive. The policy framework outlines all policy and strategy documents related to the marketing, use of pesticides. These policy documents concern the National Agricultural Investment Plan (PNIA 2). The main actors involved in the sector are the Directorate of Plant Protection, Control and Quality (DPVCQ), the National Laboratory for Support to Agricultural Development (LANADA), the Ivorian Centre for Antipollution (CIAPOL), the National Laboratory of Metrological Quality Tests and Pollution Analysis (LANEMA), universities and research centres, the Pesticides Committee, agricultural management and advisory companies, Agricultural Professional Organizations (OPA) as well as professionals in the field of phytosanitary sector and health and environmental NGOs.</p> <p>Intensive and widespread use of pesticides has played an important role in the expansion of Ivorian agriculture. About 13,300 tons of pesticides have been marketed each year, this amount not taking into account illegal imports, which could represent 40% of the market. The chemical pesticides used in Côte d'Ivoire are almost exclusively synthetic pesticides, essential to maintain production levels of the agricultural sector. These include insecticides, herbicides, fungicides, acaricides, nematocides and rodenticides. The pesticides used belong to organophosphorus compounds, carbamates, synthetic pyrethroids, sulfonyl compounds and triazines.</p> <p>Most registered pesticides are used in crops such as cotton (17%), banana and pineapple (15%), cocoa (10%), vegetables (10%) and rice (6%). Rubber and oil palm crops mainly use herbicides.</p> <p>Pesticide risk management will mainly consist in the implementation of technical and operational measures (selection of pesticides, acquisition-control, transport and storage,</p>

	<p>handling and management of packaging), in the use of biological control (crop pests) , cultural control, reasoned chemical control, varietal selection, mechanical control, genetic control and in the training / sensitization of the actors (capacity building at all levels and dissemination of educational programs in the field of environment). With regard to staff training and population information / awareness, indicators on the number of farmers adopting IPM methods, good agricultural and phytosanitary practices, the number of training sessions carried out and the percentage of the population affected by the awareness campaigns are proposed.</p> <p>Risk Assessment SBIOCI recognize that a large-scale national plan for management of pesticides has been initiated in 2018. However, due to the short implementation period and the wide use of pesticides the indicator is assessed as specified risk.</p>
<p>Means of Verification</p>	<ul style="list-style-type: none"> Existing legislation Best management practices Supply contracts
<p>Evidence Reviewed</p>	<ul style="list-style-type: none"> Programme de Transformation de l’agriculture en Afrique de l’ouest, plan de gestion de pestes. Ministere de l’agriculture et du développement rural. 2018
<p>Risk Rating</p>	<p><input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>
<p>Comment or Mitigation Measure</p>	<p>The mitigation measures are divided in 4 groups: A. Contract with seller; B. Slope gradient and erosion; C. WHO pesticides; D. Best practice</p> <p>Mitigation measures will be implemented on the plantation</p> <p>Regarding A, contract with seller:</p> <ul style="list-style-type: none"> 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 <p>Regarding B, Slope gradient and erosion</p> <ul style="list-style-type: none"> 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 (<math><3^{\circ}</math>); 2, moderate slopes (<math>3^{\circ}</math>-<math>10^{\circ}</math>) moderate risk of gully erosion and 3. steep slopes (<math>10</math>-<math>20^{\circ}</math>) 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 : <ul style="list-style-type: none"> Near flat (<math><3^{\circ}</math>): sheet erosion can take place, but acceleration is not likely Moderate (<math>3^{\circ}</math>-<math>10^{\circ}</math>): prevention of erosion control measures is needed Steep (<math>10</math>-<math>20^{\circ}</math>) : planning is crucial, high risk of gully erosion

	<ul style="list-style-type: none"> • On-site inspection by forester or biologist, classifying level of elevation <ul style="list-style-type: none"> ○ Erosion prevention moderate terrain: roots are piled in long rows along the rows of the new trees. ○ Erosion prevention moderate and steep terrain: At preharvest meeting it is clarified that pilling of roots has to happen immediately following the completion of the harvest and that the turning over of the old plantation is max 2 weeks ahead. ○ 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 • 3 days of rain => skidding stops <p>Regarding C, pesticides</p> <ul style="list-style-type: none"> • 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. <ul style="list-style-type: none"> ○ 1B "Highly hazardous" registrations will lead to a limitation in operational area. Only biomass from near-flat terrain (<math><3^{\circ}</math>) and moderate slopes (<math>3^{\circ}< be="" can="" from="" li="" math>)="" math>-<math>10^{\circ}<="" plantation.<="" purchased="" the=""> ○ 1A "Extremely hazardous" registrations will to a limitation in operational area. Only biomass from near-flat terrain (<math><3^{\circ}</math>) can be purchased from the plantation. </math>3^{\circ}<> • Monitoring of impact of the mitigation measure: future registration of 1A and 1B pesticides when the plantation is re-visited for another harvesting operation. <p>D. Best practice</p> <ul style="list-style-type: none"> • In order to develop the plantation IPM system, best practice manuals are sent to supplying plantations.
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	Indicator
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).

Finding	<p>In Rubber Plantations, the major risk from waste disposal are related to re-use of pesticide containers for various uses leading to the following risks:</p> <ol style="list-style-type: none"> 1) Mixing of chemicals with adverse effects 2) Contamination of food products and drinking water 3) Negative impact on forest ecosystems if not disposed of properly <p>The ministry of agriculture and development launched their plan for management of pesticides in 2018 and the plan address the risk mentioned above</p> <p>Risk Assessment SBIOCI recognize that a large-scale national plan for management of pesticides has been initiated in 2018. However, due to the short implementation period and the wide use of pesticides, there is risk that pesticide waste disposal methods haven't been implanted properly and therefore the indicator is assessed as specified risk.</p>
Means of Verification	<ul style="list-style-type: none"> • Regional best management practices • Supply contracts
Evidence Reviewed	<ul style="list-style-type: none"> • Programme de Transformation de l'agriculture en Afrique de l'ouest, plan de gestion de pestes. Ministiere de l'agriculture et du développement rural. 2018
Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	<p>The mitigation measures are in 3 groups: A. Contract with seller; B. On-site check of pesticide disposal; C. Best practice</p> <p>Mitigation measures will be implemented on the plantation</p> <p>Regarding A, On-site check list of pesticide waste disposal method:</p> <ul style="list-style-type: none"> • 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? <p>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.</p> <ul style="list-style-type: none"> • Best management practise.

	Indicator
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.

Finding	<p>Rubberwood plantations in Côte d'Ivoire have been growing and the harvest area have been growing from about 120.000 hectares in 2008 to 354.000 hectares in 2017. In 2018 APROMAC estimate that the total area of rubberwood plantation has reached 650.000 hectares - immature as well as mature production area.</p> <p>SBIOCI harvest aged and non-productive trees stands at an age of 30-40 years, where the suppliers want to replant and start a new rotation. Producers of rubberwood normally replant within 1 year after the old crop has been removed.</p> <p>Based on the foregoing this indicator is assessed as low risk</p>
Means of Verification	<ul style="list-style-type: none"> • Harvesting records • Documentation of operational practice
Evidence Reviewed	<ul style="list-style-type: none"> • http://www.fao.org/faostat/en/#data/QC • APROMAC : http://apromac.ci/
Risk Rating	<p><input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>
Comment or Mitigation Measure	

	Indicator
2.3.2	Adequate training is provided for all personnel, including employees and contractors (CPET S6d).
Finding	<p>The law 2015/532 on the Work Code requires that employees are registered with social prevention institutions within a prescribed timeframe, and that they receive professional development and training appropriate to their work, at the employer's expense. The working time limit in the agricultural sector to which forest activities belong, is of 2400 hours per year (approx. 46 hours per week). The Labour Code gives freedom to the parties to conclude the employment contract in the manner of their choosing. Persons involved in harvesting activities must hold required certificates of competence for the function they carry out.</p> <p>Agricultural and forestry workers rarely benefit from professional training and development opportunities and are often not registered with the social security services by their employer.</p> <p>Risk Conclusion This indicator has been evaluated as specified risk, with regards to registration with social security services. Identified laws are not upheld consistently by all entities and/or are often ignored, and/or are not enforced by relevant authorities. For the rest, the risk of illegal activity is low.</p>
Means of Verification	<ul style="list-style-type: none"> • Existing legislation • Level of enforcement • Training records

Evidence Reviewed	<ul style="list-style-type: none"> • NEPCon risk assessment of Côte d'Ivoire: https://www.nepcon.org/sourcinghub/timber/timber-cote-divoire • Law 2015/532 on the Work Code (Loi n°2015-532 portant code du travail)
Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	<p>The mitigation measure is 1: A. SBIOCI on boarding training program</p> <p>Mitigation measures will be implemented on the harvest operation</p> <p>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.</p> <ul style="list-style-type: none"> ○ Training records

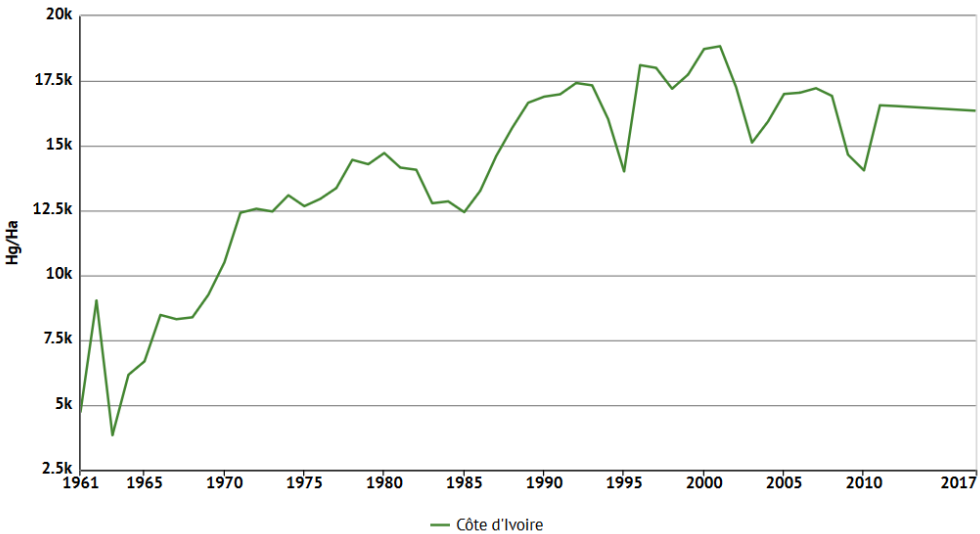
	Indicator
2.3.3	Analysis shows that feedstock harvesting and biomass production positively contribute to the local economy, including employment.
Finding	<p>Côte d'Ivoire is the first African producer of natural rubber and the 7th worldwide. Natural rubber competes with other cash crops such as cocoa 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.</p> <p>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.</p> <p>Once regarded as waste and burned locally or partially used as firewood, the overgrown rubber trees now face a new potential.</p>

	<p>Local employees working with the machinery extracting the wood, chipping operators, truck drivers and chippers 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.</p> <p>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.</p> <p>A minor part of the branches and logs are left in the plantations as a source of income for local firewood collectors, which enable the local population to source this as firewood instead of cutting other forest wood. By extraction and use of the rubberwood trees SBIOCI support the no-burn policy</p> <p>Based on the foregoing this indicator is assessed as low risk.</p>
Means of Verification	<ul style="list-style-type: none"> • Analysis of the contribution to the local economy • Description of the direct economic value created • Records of personnel and jobs created
Evidence Reviewed	<ul style="list-style-type: none"> • http://www.reperci.org/about-us/mission
Risk Rating	<p><input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>
Comment or Mitigation Measure	

	Indicator
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).
Finding	<p>Rubberwood plantations in Côte d’Ivoire have been growing and the harvest area have been growing from about 120.000 hectares in 2008 to 354.000 hectares in 2017. In 2018 APROMAC estimate that the total area of rubberwood plantation has reached 650.000 hectares - immature as well as mature production area.</p> <p>The health, vitality and other services provided by the rubberwood ecosystem of the plantation can be assessed by statistics of the yield from rubber plantations in general. If yield is stable over a long period of time the health and vitality is considered maintained.</p>

	<p>Statistical data on yield per hectare in the plantations are presented above. Yield has been increasing since 1965, and properly there have been different measurement methods over time, but today with a steady level of about 1,6 ton / hectare. On this basis the health and vitality of the rubberwood ecosystem is considered maintained and the indicator is assessed as low risk.</p>
Means of Verification	<ul style="list-style-type: none"> • Production statistics
Evidence Reviewed	<ul style="list-style-type: none"> • https://knoema.fr/FAOPRDSC2017/production-statistics-crops-crops-processed • https://transportpolicymatters.org/2018/09/
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
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).
Finding	<p>Rubberwood plantations in Côte d'Ivoire have been growing and the harvest area have been growing from about 120.000 hectares in 2008 to 354.000 hectares in 2017. In 2018 APROMAC estimate that the total area of rubberwood plantation has reached 650.000 hectares - immature as well as mature production area.</p> <p>The efficiency of the management of natural processes such as fires, pests and diseases of rubberwood plantations can be assessed by statistics of the yield from rubber plantations in general. If yield is stable over a long period of time the efficiency of the management systems is considered appropriate.</p>

	 <p>Statistical data on yield per hectare in the plantations are presented above. Yield has been increasing since 1965, and properly there have been different measurement methods over time, but today with a steady level of about 1,6 ton / hectare. On this basis the efficiency of the management of natural processes such as fires, pests and diseases of rubberwood plantations is considered appropriate and the indicator is assessed as low risk.</p>
Means of Verification	<ul style="list-style-type: none"> • Production statistics
Evidence Reviewed	<ul style="list-style-type: none"> • https://knoema.fr/FAOPRDSC2017/production-statistics-crops-crops-processed • https://transportpolicymatters.org/2018/09/
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
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).
Finding	<p>Rubberwood plantations are not affected by illegal loggings.</p> <p>The product of interest is rubber latex and the logs are due to the ringing “damaged” for exploitation as saw logs.</p> <p>A range of other tree species (but not rubberwood) originating from the natural forest of Côte d'Ivoire have severe problems with illegal logging. A range of reasons result in a score of 9 / 100 in 2017</p> <p>Based on the foregoing this indicator is assessed as low risk.</p>

Means of Verification	<ul style="list-style-type: none"> Existing legal framework Consultation with experts
Evidence Reviewed	<ul style="list-style-type: none"> Forest Code 2014, law no. 2014-427 Forest Code 2019, adopted June 20th 2019 https://www.nepcon.org/sourcinghub/timber/timber-cote-divoire
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
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).
Finding	<p>Land ownership</p> <p>Land tenure in Côte d’Ivoire is based above all on Law no. 98-750 of 23 December 1998 on rural land ownership, amended on two occasions by Law no. 2004-412 of 14 August 2004 (amendment of Article 26) and by Law no. 2013-655 of 13 September 2013 on the time frame granted for the establishing of customary rights on land in the customary sector (amendment of Article 6). There are also four implementing decrees for this law, which set in place the institutions necessary to its implementation.</p> <p>The Ivorian rural land ownership system is defined in Article 1 of the said Law and is made up of all land in Côte d’Ivoire except for land in the public domain, urban perimeters, State reserved land and classified forests.</p> <p>Ivorian law, furthermore, differentiates between the rural land ownership system and the customary rural land ownership system, which has different legal systems (Art. 2 and 3 Law 23 December 1998).</p> <p>The Constitution, the Civil Code and the Forest Code (notably Articles 19 to 21) regulate the question of land title law, and Rural land title law is guaranteed by the State, the public authorities, and to individuals of Ivorian nationality (Article 12 of the Constitution; Article 1 Law of 23 December 1998). Thus, access to the rural land sector is conditional to Ivorian nationality, with the exception of property rights on land in the rural land sector acquired before the Law of 23 December 1998, which are maintained or may be transferred (Article 26 of the aforementioned law). Whilst it is no longer possible to orally declare oneself as owner, the exception raised in Article 26 shows that the law agrees to recognize, temporarily, customary rights before transforming them into official civil rights at the end of a procedure detailed below.</p> <p>Foreigners (or non-native populations) may not become owners but may nevertheless have rights of use on the land.</p> <p>Furthermore, it should be noted that this Law is trying to protect holders of customary rights via its Article 26; an initiative strengthened by Article 60 of Law no. 2015-537 of 20 July 2015.</p>

Customary rights⁴³. In rural land, it is worth noting the provisions of Law No. 2015-537 of July 20, 2015 of agricultural orientation which, in addition to the establishment of a policy of securing the rights of customary landowners and landowners, on occupants on an identified property and for the delimitation of the territories of the villages, aims to promote the contractualization of the relationship between landowners and non-owner operators, as well as to resolve conflicts related to logging.

This legislative framework is an initial response to degradation factors resulting from encroachments by small cocoa and rubber producers. Article 53 of this law provides that the State encourages farmers to establish carbon sinks in their areas of operation, bearing in mind that any farm (including a family farm) must be registered and registered with the Chamber of Commerce. (Article 10), and that the operation must necessarily be in accordance with the regional management plan (Article 35), each plan being compatible with the Regional Land Use Plan (SRADT).

An articulation with the SRADT established by the local authorities is provided by the article 63 of this law, which stipulates well that these plans must specify the Land uses, which necessarily includes those where will be developed the activities of reduction of emissions from the program. Finally, this law insists on the settlement of land use conflicts, in particular to improve the cohabitation of farmers and loggers. This law is yet to be operationalized through regulatory measures, which will take into account the Payment for Environmental Services (PES) approach on rural land for sectoral activities involving cocoa and rubber producers as well as measures to manage timber harvesting, or firewood, including regulatory measures that will be adopted to implement the Benefit Sharing Plan.

Two types of ownership. The rural land sector is made up of two major types of ownership: permanent ownership and temporary ownership. Whilst the former refers to land held in perpetuity which may belong to the State (or to local authorities), to individuals or be land without owners (under the conditions laid down in Article 6), the latter has provisional status and concerns in particular, the land on which customary rights are exercised as well as land granted by the State to local authorities or to individuals. Furthermore, it should be noted that all 'lands belonging to no one' or "Terra nullius" belongs de facto to the State (Article 713 of the Civil Code, Article 6 of the Law of 23 December 1998). Article 6 of the Law of 23 December 1998 lists three scenarios in which land may be declared belonging to no one.

- Lands subject to inheritance that have not been claimed for more than three (3) years,
- Customary law lands on which customary rights are exercised peacefully and continuously, and on which there is no legal claim ten years after the publication of Law 98-750,
- Leased lands on which the concessionaire's rights could not be consolidated three years after the deadline for carrying out the development required by the concession agreement;

Based on the foregoing this indicator is assessed as specified risk

⁴³ Forest Carbon Partnership Facility (FCPF), Carbon fund. Emission Reduction Program Document (ER-PD) for Tai National Park, Republic of Cote d'Ivoire. World Bank 2019 – Page 119

Means of Verification	<ul style="list-style-type: none"> Existing legal framework Land title (Titre foncier / certificat foncier + if available cadastral map) Questionnaires with local communities Customary and traditional tenure and use right
Evidence Reviewed	<ul style="list-style-type: none"> Forest Carbon Partnership Facility (FCPF), Carbon fund. Emission Reduction Program Document (ER-PD) for Tai National Park, Republic of Côte d'Ivoire. World Bank 2019 – Page 119
Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	<p>The mitigation measures are divided in 3 groups: A. Contract with seller; B Land title document of supplier; C consultation with communities</p> <p>Mitigation measures will be implemented on the supplier</p> <p>Regarding A, Contract with seller:</p> <ul style="list-style-type: none"> 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. <p>Regarding B, land title document (Titre foncier / certificat foncier + if available cadastral map) of the supplier:</p> <ul style="list-style-type: none"> Copy of full land title (Titre foncier / certificat foncier + if available cadastral map) 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 <p>Regarding C, consultation with a sample of communities surrounding plantations of the supplier:</p> <ul style="list-style-type: none"> If the supplier has 1 plantation then the nearest communities shall be consulted. If the supplier has 2 and up plantations then the nearest communities of the plantation with harvest operation shall be consulted. Furthermore, for each of the plantations without harvest operation the main community will as a minimum be consulted 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.

	<ul style="list-style-type: none"> • 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
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	Indicator
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.
Finding	<p>The planting of biomass does not have an impact on the accessibility of food or water as biomass isn't the final products which is latex.</p> <p>Côte d'Ivoire import food and people do farming and, in this way, basic needs are fulfilled. Rubber wood is part of the local economy and sustain the populations ability to buy food, water and other needs.</p> <p>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 – biomass is not the predominant crop.</p> <p>Based on the foregoing this indicator is assessed as low risk</p>
Means of Verification	<ul style="list-style-type: none"> • Interviews with local communities and other stakeholders indicate that subsistence needs are not endangered
Evidence Reviewed	<ul style="list-style-type: none"> • Interviews with local communities and other stakeholders indicate that subsistence needs are not endangered
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	

	Indicator
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.

<p>Finding</p>	<p>Village Rural Land Management Committees</p> <p>At the local level, there are conflict management structure related to land. These are the Village Rural Land Management Committees governed by the Decree n ° 99-593 of October 13, 1999 witch set up organization and attributions of the Rural Land Management Committees (CGFR) and by the Order n ° 041 MEMID / MINAGRA of June 12, 2001, Statutes of the Property Management and Comities of Rural Land Management. These CGFRs are composed on average of 10 to 16 members, including young people, women and men. According to Article 5 of the Decree, land chiefs (in the villages) must be members of the CVGFR.</p> <p>The CVGFR have a general purpose, the study of land allocation files at the village level and the settlement of disputes when there is discord.</p> <p>Above the Village Rural Property Management Committees existing the Rural Land Commission (CFR). It is organized by Order of the Prime Minister No. 55 PM of July 11, 2003.</p> <p>This Rural Land Commission is composed by representatives of the Government, National Institutions, Customary and Religious Authorities, Research, Development Projects, Technical Partners of the Rural World and Rural Financial Partners.</p> <p>Land ownership</p> <p>Land tenure in Côte d'Ivoire is based above all on Law no. 98-750 of 23 December 1998 on rural land ownership, amended on two occasions by Law no. 2004-412 of 14 August 2004 (amendment of Article 26) and by Law no. 2013-655 of 13 September 2013 on the time frame granted for the establishing of customary rights on land in the customary sector (amendment of Article 6). There are also four implementing decrees for this law, which set in place the institutions necessary to its implementation.</p> <p>The Ivorian rural land ownership system is defined in Article 1 of the said Law and is made up of all land in Côte d'Ivoire except for land in the public domain, urban perimeters, State reserved land and classified forests.</p> <p>Ivorian law, furthermore, differentiates between the rural land ownership system and the customary rural land ownership system, which has different legal systems (Art. 2 and 3 Law 23 December 1998).</p> <p>The Constitution, the Civil Code and the Forest Code (notably Articles 19 to 21) regulate the question of land title law, and Rural land title law is guaranteed by the State, the public authorities, and to individuals of Ivorian nationality (Article 12 of the Constitution; Article 1 Law of 23 December 1998). Thus, access to the rural land sector is conditional to Ivorian nationality, with the exception of property rights on land in the rural land sector acquired before the Law of 23 December 1998, which are maintained or may be transferred (Article 26 of the aforementioned law). Whilst it is no longer possible to orally declare oneself as owner, the exception raised in Article 26 shows that the law agrees to recognize, temporarily, customary rights before transforming them into official civil rights at the end of a procedure detailed below.</p> <p>Foreigners (or non-native populations) may not become owners but may nevertheless have rights of use on the land.</p> <p>Furthermore, it should be noted that this Law is trying to protect holders of customary rights via its Article 26; an initiative strengthened by Article 60 of Law no. 2015-537 of 20 July 2015.</p>
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	<p>Customary rights. In rural land, it is worth noting the provisions of Law No. 2015-537 of July 20, 2015 of agricultural orientation which, in addition to the establishment of a policy of securing the rights of customary landowners and landowners, on occupants on an identified property and for the delimitation of the territories of the villages, aims to promote the contractualization of the relationship between landowners and non-owner operators, as well as to resolve conflicts related to logging.</p> <p>This legislative framework is an initial response to degradation factors resulting from encroachments by small cocoa and rubber producers. Article 53 of this law provides that the State encourages farmers to establish carbon sinks in their areas of operation, bearing in mind that any farm (including a family farm) must be registered and registered with the Chamber of Commerce. (Article 10), and that the operation must necessarily be in accordance with the regional management plan (Article 35), each plan being compatible with the Regional Land Use Plan (SRADT).</p> <p>An articulation with the SRADT established by the local authorities is provided by the article 63 of this law, which stipulates well that these plans must specify the Land uses, which necessarily includes those where will be developed the activities of reduction of emissions from the program. Finally, this law insists on the settlement of land use conflicts, in particular to improve the cohabitation of farmers and loggers. This law is yet to be operationalized through regulatory measures, which will take into account the Payment for Environmental Services (PES) approach on rural land for sectoral activities involving cocoa and rubber producers as well as measures to manage timber harvesting, or firewood, including regulatory measures that will be adopted to implement the Benefit Sharing Plan.</p> <p>Two types of ownership. The rural land sector is made up of two major types of ownership: permanent ownership and temporary ownership. Whilst the former refers to land held in perpetuity which may belong to the State (or to local authorities), to individuals or be land without owners (under the conditions laid down in Article 6), the latter has provisional status and concerns in particular, the land on which customary rights are exercised as well as land granted by the State to local authorities or to individuals. Furthermore, it should be noted that all ‘lands belonging to no one’ or “Terra nullius” belongs de facto to the State (Article 713 of the Civil Code, Article 6 of the Law of 23 December 1998). Article 6 of the Law of 23 December 1998 lists three scenarios in which land may be declared belonging to no one.</p> <ul style="list-style-type: none"> • Lands subject to inheritance that have not been claimed for more than three (3) years, • Customary law lands on which customary rights are exercised peacefully and continuously, and on which there is no legal claim ten years after the publication of Law 98-750, • Leased lands on which the concessionaire's rights could not be consolidated three years after the deadline for carrying out the development required by the concession agreement; <p>Based on the foregoing this indicator is assessed as specified risk in terms of land right issues.</p>
<p>Means of Verification</p>	<ul style="list-style-type: none"> • Existing legal framework • Land title (Titre foncier / certificat foncier + if available cadastral map) • Questionnaires with local communities

	<ul style="list-style-type: none"> • Customary and traditional tenure and use right
Evidence Reviewed	<ul style="list-style-type: none"> • https://www.nepcon.org/sourcinghub/timber/timber-cote-divoire • https://www.grain.org/fr/article/5854-conflit-foncier-en-cote-d-ivoire-les-communautes-se-defendent-face-a-siat-et-l-etat • 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 119 • Source : http://www.foncierural.ci/index.php/institutions-foncieres-rurales/15-le-comite-villageois-de-gestion-fonciere-rurale-cvgfr •
Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	<p>The mitigation measures are divided in 3 groups: A. Contract with seller; B Land title document of supplier; C consultation with communities</p> <p>Mitigation measures will be implemented on the supplier</p> <p>Regarding A, Contract with seller:</p> <ul style="list-style-type: none"> • 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. <p>Regarding B, land title document (Titre foncier / certificat foncier + if available cadastral map) of the supplier:</p> <ul style="list-style-type: none"> • Copy of full land title (Titre foncier / certificat foncier + if available cadastral map) 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 <p>Regarding C, consultation with a sample of communities surrounding plantations of the supplier:</p> <ul style="list-style-type: none"> • If the supplier has 1 plantation then the nearest communities shall be consulted. • If the supplier has 2 and up plantations then the nearest communities of the plantation with harvest operation shall be consulted. Furthermore, for each of the plantations without harvest operation the main community will as a minimum be consulted. • 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)

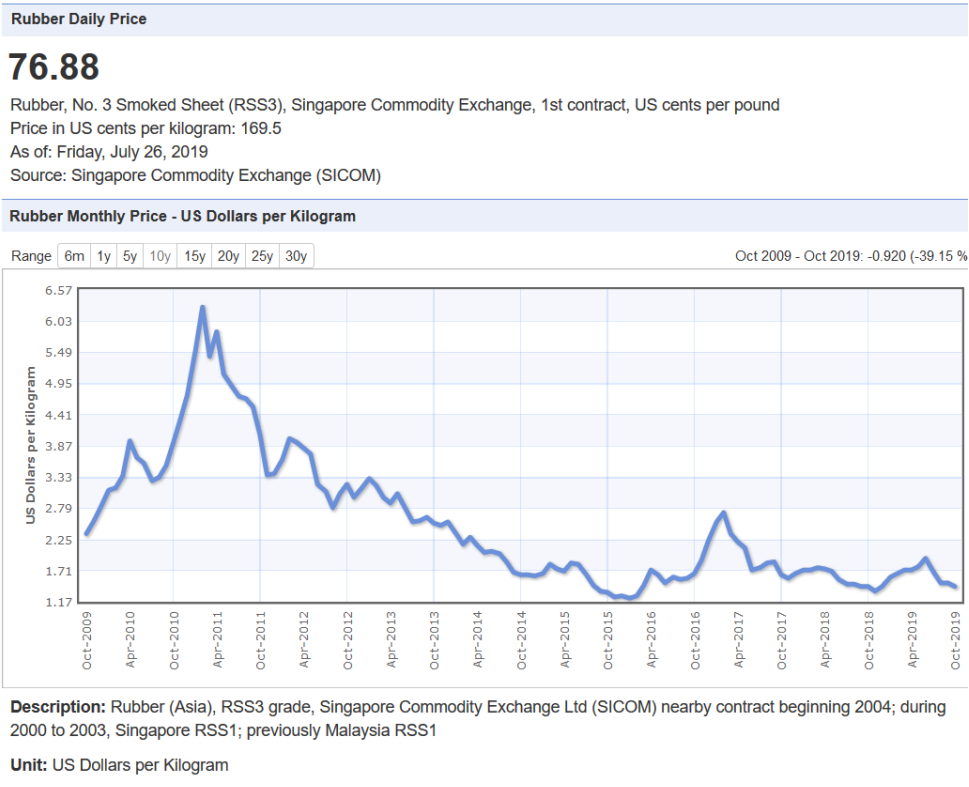
	<ul style="list-style-type: none"> • If persons interviewed report about disputes, then more people shall be interviewed until a conclusion can be reached and described. • If the conclusion is that ownership hasn't been achieved through consensus and transparency, then the plantation will be excluded 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
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	Indicator
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.
Finding	<p>ILO conventions Côte d'Ivoire has ratified the eight fundamental ILO principles and rights at work, based on the eight ILO core labour conventions, covering 1) freedom of association, 2) Forced labour, 3) Discrimination and 4) Child labour. ILO convention 98 (Right to collective bargaining) has been ratified and is in force ILO convention 87 (Freedom of Association) has been ratified and is in force ILO convention 135 (Workers Representatives Convention) has been ratified and is in force</p> <p>Description of situation The right to organize and join labour unions is constitutionally guaranteed. Workers have the right to bargain collectively. Côte d'Ivoire typically has various professional strikes every year, though sometimes strikes have become violent. In 2018, teachers, university professors, police, and civil servants all organized labour strikes in demand of back pay from the government, with some such actions apparently inspired by the military mutinies the previous year.</p> <p>The labour code, law No. 2015-532 of 20 July 2015 regulate freedom of association and that the effective recognition of the right collective bargaining is respected.</p> <p>The labour code forbids employing anyone under 16 and ensures that all workers are free to participate in union activities. To that end, workers may be members of the company or corporation level trade unions/syndicates and the law prohibits employers from using pressure tactics against or in favour of a trade union organization of any worker.</p> <p>In line with the labour code the government of Côte d'Ivoire has a "protocol of agreement on social truce with the following confederations which cover a number of unions/syndicates.</p> <ol style="list-style-type: none"> 1. Centrale Syndicale Humanisme (CSH) <ol style="list-style-type: none"> a. 112 syndicates 2. Fédération des Syndicats Autonomes de Côte d'Ivoire (FESACI)

3. Union Générale des Travailleurs de Côte d'Ivoire (UGTCI)
 - a. 157 syndicates.
4. Confédération des syndicats libres de Côte d'Ivoire (DIGNITE)
5. Union Nationale des Travailleurs de Côte d'Ivoire, (UNATR-CI)
6. Plateforme Nationale des Organisations Professionnelles du Secteur Public de Côte d'Ivoire
7. Intersyndicale des Fonctionnaires de Côte d'Ivoire (IFCI)
8. Coordination des Syndicats de la Fonction Publique, représentée par sa Coordonnatrice (COSYFOP)

One clear reference to an agro-industrial rubber plantation is from October 2018. "SoGB Following strike action and despite an agreement signed between workers' delegates and union representatives, the Grand-Bereby Rubber Company (SoGB) in Côte d'Ivoire declared a "lock out" of the plantation, effective October 4, says a company statement released yesterday. " *Some people are questioning this agreement by carrying out an illegal strike without the support of the union representatives of the plantation and stopping SOGB's activities. Workers who were not members of the movement were systematically threatened physically by the strikers. As a result, on October 4, General Management declared a "lockout" of the plantation until the safety of employees and facilities was assured,* "says SOGB.

Over the past decade, world rubber prices skyrocketed only to quickly slump to the point where they are now a fifth of what they once were because of a glut in the market. The lower prices lead to risk of termination for economic reasons and therefore the need of the unions to protect workers' rights.



Assessment of risk

	<p>SBIOCI assess that the freedom of Association and the effective recognition of the right to collective bargaining is well established through confederations and syndicats. The syndicats have an important role in protection of workers' rights especially considering fluctuations in world market prices of rubber. SBIOCI, however find, that there is a specified risk of workers not knowing of syndicats or not finding a syndicate which fits to their personal belief.</p>
<p>Means of Verification</p>	<ul style="list-style-type: none"> • Research • Existing legal framework and level of governance • Company policies • Interviews with Heads of Human Resources • Interviews with workers
<p>Evidence Reviewed</p>	<ul style="list-style-type: none"> • Law No. 2015-532 of 20 July 2015 on the new Labour Code • http://www.linfodrome.com/societe-culture/23313-emploi-en-cote-d-ivoire-voici-les-innovations-du-nouveau-code-du-travail • Amnesty International https://www.amnesty.org/en/countries/africa/cote-d-ivoire/report-cote-divoire/ • ILO, eight core https://www.ilo.org/dyn/normlex/en/f?p=1000:10011::NO:10011:P10011_DISPLAY_BY,P10011_CONVENTION_TYPE_CODE:1,F ILO convention ratification • https://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:103023 • CSH: http://www.lecnp.ci/organisation_base_1.php • FESACI: http://fesacicotivoire.e-monsite.com/ • UGTCI: http://www.ugtci.org/syndicats_affilies.html • DIGNITE: https://cisl-dignite.com/les-centrales-professionnelles/ • https://freedomhouse.org/report/freedom-world/2019/c-te-divoire • http://www.gouv.ci/doc/1503071287NOUVEAU%20PROJET%20PROTOCOLE%20DACCORD%20%20TREVE%20SOCIALE.pdf • https://www.indexmundi.com/commodities/?commodity=rubber
<p>Risk Rating</p>	<p><input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>
<p>Comment or Mitigation Measure</p>	<p>The mitigation measures are as follows: A, Interview with workers; B, Best practice for plantation.</p> <p>Mitigation measures will be implemented on the plantation.</p> <p>Interview with workers in the plantation:</p> <ul style="list-style-type: none"> • Questionnaire focusing on workers knowhow about syndicats 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: <ul style="list-style-type: none"> ○ ID card ○ Full name ○ What info has your employer given to you about syndicats? ○ Which syndicats do you know?

	<ul style="list-style-type: none"> ○ 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? <ul style="list-style-type: none"> ● 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: If there are indications of workers being discouraged from joining syndicates the plantation shall address the problem within a short period of time or become excluded. Indications shall be addressed and solved before biomass can be considered compliant. ● Interview reports with findings ● Questionnaires to be saved for 5 years
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	Indicator
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.
Finding	<p>ILO conventions Côte d’Ivoire has ratified the eight fundamental ILO principles and rights at work, based on the eight ILO core labour conventions, covering 1) freedom of association, 2) Farced labour, 3) Discrimination and 4) Child labour. ILO convention 29 and 105 have been ratified and are in force</p> <p>Description of situation Côte d’Ivoire has a labour code applicable to all workers in the country. This is the law No. 2015-532 of July 20, 2015. This law explains in the article 3 that compulsory or forced labour, i.e. any work or service required of a person under the threat of any penalty, is absolutely prohibited. Few data exist on forced labour in the forestry sector in general and in rubber cultivation.</p> <p>Risk assessment As few data exist on forced labour in the rubber cultivation, the risk is assessed as specified risk.</p>
Means of Verification	<ul style="list-style-type: none"> ● Existing legal framework ● Supply contracts ● Interviews
Evidence Reviewed	<ul style="list-style-type: none"> ● Law n°2015-532 of July 20, 2015 ● ILO, eight core https://www.ilo.org/dyn/normlex/en/f?p=1000:10011:::NO:10011:P10011_DISPLAY_BY_P10011_CONVENTION_TYPE_CODE:1,F ● ILO convention ratification https://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0:::NO:11200:P11200_COUNTRY_ID:103023

Risk Rating	<input type="checkbox"/> Low Risk	<input checked="" type="checkbox"/> Specified Risk	<input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	<p>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 interview personal with HR records of employment and salary</p> <p>Mitigation measures will be implemented on the plantation</p> <p>Regarding A, Contract with seller:</p> <ul style="list-style-type: none"> 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 <p>Regarding B, policy of association:</p> <ul style="list-style-type: none"> 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. <p>Regarding C, interview with workers in the plantation:</p> <ul style="list-style-type: none"> 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: <ul style="list-style-type: none"> 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 <p>Regarding D, cross check of ID numbers of interview personal with HR records of employment and salary</p> <ul style="list-style-type: none"> Full anonymity system Information of interviewed personal to be confirmed by HR department. Zero tolerance policy: <ul style="list-style-type: none"> 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 		

	<p>an indication of forced labour. Further interviews to be conducted until a conclusion can be reached.</p> <ul style="list-style-type: none"> ○ 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
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Indicator	
2.7.3	The Biomass Producer has implemented appropriate control systems and procedures to verify that feedstock is not supplied using child labour.
Finding	<p>ILO Conventions</p> <p>Côte d'Ivoire has ratified the eight fundamental ILO principles and rights at work, based on the eight ILO core labour conventions, covering 1) freedom of association, 2) Forced labour, 3) Discrimination and 4) Child labour.</p> <p>ILO convention 138 and Recommendation 146 (Minimum Age and Recommendation) have been ratified and are in force</p> <p>Definition of a child by SBP:</p> <p>Any person less than 15 years of age, unless the minimum age or mandatory schooling is stipulated as being higher by local law, in which case the stipulated higher age applies in that locality.</p> <p>In Côte d'Ivoire the mandatory age for schooling is from 6 to 16 years.</p> <p>Description of situation</p> <p>The problem of child labour on plantations (coffee, cocoa, rubber trees) in Côte d'Ivoire is a reality. It is noted that 48% of economically active children are between 14 and 17 years of age. A survey conducted in 2013 revealed that about 1.4 million children are involved in work in all sectors of activity, 49.1% of them in agriculture (including forestry), over 38% in the service sector and 12% in industry.</p> <p>In 2010, the country passed a law (Law No. 2010-272 of September 30, 2010) prohibiting trafficking and the worst forms of child labour.</p> <p>In 2011, an Interministerial Committee to Combat Trafficking, Exploitation and Child Labour (CIM) was created by Decree No. 2011-365 of November 3, 2011. This committee is responsible for:</p> <ul style="list-style-type: none"> • Define and ensure the application of government guidelines in the context of the national policy to combat trafficking and exploitation of child labour; • Validate the various programs and projects carried out by the partners in order to verify their compliance with the national policy to combat child trafficking, exploitation and labour; • Coordinate the activities of all actors involved in the fight against trafficking, exploitation and child labour;

	<ul style="list-style-type: none"> Evaluate the implementation of programs and projects relating to the fight against trafficking, exploitation and child labour. <p>It then created a National Committee to Monitor Actions to Combat Trafficking, Exploitation and Child Labour (CNS) by Decree No. 2011-366 of November 3, 2011. It is responsible for:</p> <ul style="list-style-type: none"> Monitor the implementation of government projects and programmes to combat child trafficking, exploitation and labour; Monitor the implementation of conventions against trafficking, exploitation and child labour; Initiate actions to prevent and care for child victims of trafficking, exploitation and the worst forms of child labour. <p>In 2016 CNF together with UNICEF published a report on prevalence of child labour. Child labour was found to take place in cocoa and coffee plantations as these often are family/outgrowers' businesses but CNF and UNICEF also conclude that child labour takes place in rubberwood plantations. The report, however, does not qualify to which extend or if child labour takes place in industrial plantations or at outgrowers.</p> <p>Assessment of risk Based on the foregoing this indicator is assessed as specified risk.</p>
Means of Verification	<ul style="list-style-type: none"> Existing legislation Level of enforcement Supply contract Records of field inspections
Evidence Reviewed	<ul style="list-style-type: none"> National Action Plan on Child Labour (2012-2014) Strategic Plan for Accelerating Girls' Education (2016-2018) Ministry of State, Ministry of Pan and Development. National Survey on the Situation of Employment and Child Labour (ensete 2013) Law n°2015-532 of July 20, 2015 https://www.jeuneafrique.com/depeches/246529/politique/cote-divoire-ouattara-decrete-lecole-obligatoire-pour-les-6-a-16-ans/ CNF and UNICEF report on prevalence of child labour in Côte d'Ivoire in 2016. https://www.refworld.org/pdfid/5a0021b70.pdf ILO, eight core https://www.ilo.org/dyn/normlex/en/f?p=1000:10011:::NO:10011:P10011_DISPLAY_BY_P10011_CONVENTION_TYPE_CODE:1,F ILO convention ratification https://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0:::NO:11200:P11200_COUNTRY_ID:103023
Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	<p>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;</p> <p>Mitigation measures will be implemented on the plantation</p> <p>Regarding A, Contract with seller:</p> <ul style="list-style-type: none"> 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 exceed = 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
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	Indicator
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.
Finding	<p>ILO conventions Côte d'Ivoire has ratified the eight fundamental ILO principles and rights at work, based on the eight ILO core labour conventions, covering 1) freedom of association, 2) Forced labour, 3) Discrimination and 4) Child labour. ILO convention 100 is ratified and in force</p> <p>Description of situation In Côte d'Ivoire, several cultural, political and socio-economic factors explain the inequalities and discrimination observed in the workplace. Discrimination against women, vulnerable people and people with disabilities is the most common. At the level of women, it is the cultural factor that is very often highlighted as the main cause of discrimination and inequality against them. Since 1995, the country has ratified all international provisions and conventions on the elimination of discrimination against women.</p> <p>In addition, the constitution adopted in November 2016 recognizes the rights, freedoms and duties of every Ivorian woman / man. It prohibits all forms of discrimination against women, sets out the principles of equality between all citizens and ensures the protection of vulnerable people.</p> <p>In addition to these agreements, Côte d'Ivoire has also adopted and implemented several policies, programmes, action plans, strategies and projects. These are: (i) the Action Plan for the implementation of UN Security Council Resolution 1325; (ii) the Action Plan for the implementation of the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW); (iii) the National Action Plan for Women; (iv) the Innovative Management Project of the National Fund for Women and Development; (v) the Operational Plan for the Policy on Equal Opportunities and Gender (2014-2016).</p> <p>For Global Gender Gap, World Economic forum assessed Côte d'Ivoire as number 131 out of 149 countries in 2018.</p> <p>In the annual report of 2017 of the National Council on Human Rights in Côte d'Ivoire, it was found that women are weakly represented in administrative bodies and in the justice system.</p>

	<p>Risk Assessment</p> <p>SBIOCI recognize that lots of efforts, politically have been made against discrimination, but Côte d'Ivoire is still positioned as low as number 131 out of 149 countries in terms of gender gap. On this basis the indicator is assessed as specified risk</p>
<p>Means of Verification</p>	<ul style="list-style-type: none"> • Company policies • Existing legislation • Interviews with Heads of Human Resources • Interviews with workers • Payroll records
<p>Evidence Reviewed</p>	<ul style="list-style-type: none"> • Action Plan for the implementation of UN Security Council Resolution 1325 • Action Plan for the Implementation of the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) adopted in 1979 • National Action Plan for Women adopted in 2007 • Innovative Management Project of the National Fund for Women and Development • Operational plan for the policy on equal opportunities and gender (2014-2016) • http://www3.weforum.org/docs/WEF_GGGR_2018.pdf • http://www.cndh.ci/?fichier=detailart&idart=780&rub=187 • ILO, eight core https://www.ilo.org/dyn/normlex/en/f?p=1000:10011:::NO:10011:P10011_DISPLAY_BY_P10011_CONVENTION_TYPE_CODE:1,F • ILO convention ratification https://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0:::NO:11200:P11200_COUNTRY_ID:103023
<p>Risk Rating</p>	<p><input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>
<p>Comment or Mitigation Measure</p>	<p>The mitigation measures are divided in 3 groups: A. Contract with seller; B, payroll package score linked to biomass price C. comparison of salary between men and woman D. Best practice</p> <p>Mitigation measures will be implemented on the plantation</p> <p>Regarding A, Contract with seller:</p> <ul style="list-style-type: none"> • Both parties ensure that employment-related decisions are based on relevant and objective criteria <p>Regarding B, payroll package score linked to biomass price</p> <ul style="list-style-type: none"> • 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 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. <p>Example:</p>

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: 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
Free electricity	CFA9.148	Avg kWh/price = 72,604 CFA (https://www.globalpetrolprices.com/Ivory-Coast/electricity_prices/) - 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 % - http://www.cnps.ci/Anglais/employer/social-contributions/Pages/Contribution-rate.aspx
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%	
The plantation is paid 92,94 % of the agreed price per metric tons		

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
- 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 woman will as part of the average calculations result in a lower percentage and thereby lower price at the plantation.

Regarding C. Comparison of salary between men and women

Comparison of minimum 5 pays slips from woman with 5 pays slips from men, with same experience and function. If a significant difference is found between the average of men and women the plantation will be asked why this is the case.

SBIOCI will provide examples of best practices for working with equal rights between men and woman.

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
- If salary bulletins/contract 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

	<ul style="list-style-type: none"> Other in-kind documentation <p>Regarding D. Best practice Policy for equal rights between women and men</p>
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	Indicator																		
2.7.5	<p>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.</p>																		
Finding	<p>In order to assess a fair level of income and employment conditions in the agro industrial rubber plantations, direct comparisons are made to the cocoa sector in Côte d'Ivoire.</p> <p>Benchmark study on living income in cocoa sector In October 2018 leaders from across Côte d'Ivoire's cocoa sector came together with the global chocolate industry in Abidjan to provide feedback on the draft Living Income benchmark study for the country's cocoa growing regions. The objective of the study was: <i>"The Côte d'Ivoire Living Income Benchmark study, and the parallel study being conducted in Ghana, intend to: 1) create credible, robust costs of a decent living assessments for the critical cocoa growing regions of both countries and 2) contribute to the learning about how to calculate and use a living income benchmark for smallholder farmers. "</i></p> <p>SBIOCI realize that there are differences between smallholder farmers and workers employed by an agro-industrial plantation, however the costs are considered comparable with the difference that cocoa farmers also may have costs related to production.</p> <p>The benchmark for a decent standard of living for 2 adults and 4 children was 262.056 CFA/month.</p> <div style="background-color: #f4cccc; padding: 10px; margin: 10px 0;"> <p>The cost of a basic but decent standard of living calculated in the study is CFA 262,056/month (USD\$454/mo) for a family of six (2 adults and 4 children).</p> <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr style="background-color: #0070c0; color: white;"> <th>Item</th> <th>CFA</th> <th>USD</th> </tr> </thead> <tbody> <tr> <td>Decent food cost per month for reference family</td> <td>124,625</td> <td>216</td> </tr> <tr> <td>Decent housing costs per month</td> <td>29,850</td> <td>52</td> </tr> <tr> <td>Non-food non-housing costs per month taking into consideration post checks</td> <td>95,102</td> <td>165</td> </tr> <tr> <td>Additional 5% for sustainability and emergencies</td> <td>12,479</td> <td>22</td> </tr> <tr style="background-color: #0070c0; color: white;"> <td>Total household costs per month for basic but decent living standard for reference family (2 adults and 4 children)</td> <td>CFA 262,056 /month</td> <td>USD\$ 454/ month</td> </tr> </tbody> </table> </div> <p>But how to compare actual income with the benchmark.: <i>"Calculating the gap between living income and actual incomes proves more complex than comparison between living wage and prevailing wages...this is in part due to the inherent</i></p>	Item	CFA	USD	Decent food cost per month for reference family	124,625	216	Decent housing costs per month	29,850	52	Non-food non-housing costs per month taking into consideration post checks	95,102	165	Additional 5% for sustainability and emergencies	12,479	22	Total household costs per month for basic but decent living standard for reference family (2 adults and 4 children)	CFA 262,056 /month	USD\$ 454/ month
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difficulty in calculating actual incomes” said Dr Tyszler. “Incomes can primarily be identified through self-reporting and only a small number of households accurately know or keep records of revenues and, particularly, costs...another challenge is that household income can come from a variety of sources which each need to be picked apart, whereas wages are more clear-cut

From the scheme below the different sources of income for cocoa households are presented. As mentioned, the research did not focus on workers in agro-industrial plantations, but there is an indication that non-cocoa producers on average have about 69 % of their income from other crops, e.g. rubber.

Table 12.4 Percent of household income from difference sources (average), by cocoa vs non-cocoa households

	Ghana cocoa	Ghana non-cocoa	Côte d'Ivoire cocoa	Côte d'Ivoire non-cocoa
Sale of cocoa	61%	10%	66%	5%
Sale of other crops	20%	56%	24%	69%
Own small business or trading	10%	16%	4%	10%
Remittances from friends and family living away from the household	2%	3%	1%	3%
Sale of livestock or livestock products	2%	3%	0%	0%
Salary employment in government job (teacher, nurse, police)	2%	4%	1%	1%
Other	1%	3%	4%	8%
Salary employment with a company	1%	1%	0%	1%
Labouring for other people on their farms	0%	1%	0%	1%
Sale of fish	0%	3%	0%	0%
Labouring for other people non-agriculture	0%	1%	0%	1%
Sale of bush products (bush meat, charcoal, wood etc.)	0%	0%	0%	0%
Sale or lease of land	0%	0%	0%	0%

The cocoa industry realizes that there is a gap, which SBIOCI also estimate is present in the agro-industrial rubber sector.

Living income differential

The World Cocoa Foundation (WCF) held its flagship Partnership Meeting October 23-24, 2019 in Berlin, Germany. The first day was marked by the announcement by the governments of the world’s largest cocoa producing countries, Côte d’Ivoire and Ghana, that their new joint pricing policy under the Abidjan Declaration includes a base price and a **living income differential (LID)**, which has been instituted as a permanent mechanism and will be going directly to cocoa farmers tax free.

Minimum salary in Côte d’Ivoire

Article 31.8. of the law No. 2015-532 of July 20, 2015 on the Labour Code sets the minimum wage:

- The "Salaire minimum interprofessionnel garanti (SMIG)" is set at 60.000 CFA per month.
- The " Salaire minimum agricole garanti (SMAG)" is set at 36.000 CFA per month.

Salary levels at agro-industrial rubber plantations

During on-site visits and interviews with staff, SBIOCI registered monthly salaries between 60.000 CFA and 167.000 CFA + a variety of other benefits, for plantation workers.

	<p>Risk Assessment</p> <p>SBIOCI assess on the basis of the difference between the minimum salaries and the benchmark study from the cocoa sector that there is specified risk of people not getting pay and employment conditions which are fair and meet, or exceed, minimum requirements.</p>												
Means of Verification	<ul style="list-style-type: none"> Existing legislation Level of enforcement 												
Evidence Reviewed	<ul style="list-style-type: none"> 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/2019/11/11/Update-on-Living-Income-in-the-Cocoa-Sector https://www.sustainableagriculture.eco/blog/2017/11/9/is-saving-water-enough-5tss3 												
Risk Rating	<p><input type="checkbox"/> Low Risk X Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>												
Comment or Mitigation Measure	<p>The mitigation measures are A: minimum accepted condition combined B, a payroll package score linked to biomass price</p> <p>Regarding A, Minimum accepted condition:</p> <ul style="list-style-type: none"> The “Salaire minimum agricole garanti (SMAG)” is set at 36.000 CFA per month. <ul style="list-style-type: none"> 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 <p>Regarding B, payroll package score linked to biomass price</p> <ul style="list-style-type: none"> 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 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. <p>Example:</p> <table border="1"> <tr> <td>Payroll target</td> <td>CFA100.000</td> <td>100 % for 1 employee. Level to be clarified by stakeholder consultation every second year</td> </tr> <tr> <td>Payroll item</td> <td></td> <td>Remark and reference</td> </tr> <tr> <td>Salary</td> <td>CFA36.000</td> <td>Salary below SMAG disqualifies - salary is the average for the lowest paid job category</td> </tr> <tr> <td>Free housing</td> <td>CFA29.850</td> <td>Decent housing cost: 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</td> </tr> </table>	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: 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
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	Free electricity	CFA9.148	Avg kWh/price = 72,604 CFA (https://www.globalpetrolprices.com/Ivory-Coast/electricity_prices/) - 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 % - http://www.cnps.ci/Anglais/employer/social-contributions/Pages/Contribution-rate.aspx
	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%	
	The plantation is paid 92,94 % of the agreed price per metric tons		
	<p>Compliance and development targets: The target price of for the payroll package will be assess by a stakeholder consultation every 2 years.</p> <ul style="list-style-type: none"> • 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 woman will as part of the average calculations result in a lower percentage and thereby lower price at the plantation. <p>Documentation:</p> <ul style="list-style-type: none"> • 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 • If salary bulletins/contract 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>Other in-kind documentation</p>		

	Indicator
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).
Finding	Workers involved in production of feedstock will handle chainsaws, heavy agricultural material as skidders, log loaders, forwarders, front loaders and woodchippers.

In Côte d'Ivoire Health and Safety at work is regulated by the "Code du travail" 2017 edition. The code consists of 11 chapters covering: employment, working conditions, salary, health and safety and health care organisations job, professional unions, representatives, collective bargaining, work disputes, monitoring work and employment, repressive provisions, transitional and final provisions and text amending and decrees of application. The law also requires employers to give information about the statistics concerning occupational accidents and diseases.

According to statistics forestry work together with agriculture has a high risk of work-related accidents. Old data (2005) from Côte d'Ivoire, showed a distribution per sector as follows:

SECTEUR D'ACTIVITE	NOMBRE D'ACCIDENT	FREQUENCE	TAUX D'ACCIDENT
AGRICOLE	440	14,83	0,67
AUTRES	67	2,26	0,24
BATIMENT	117	3,94	1,15
COMMERCE	183	6,17	0,14
ELECTRICITE	42	1,42	0,51
FORESTERIE	65	2,19	0,79
INDUSTRIE	1539	51,89	0,79
MARITIME	156	5,26	0,81
TRANSPORT	357	12,04	0,76
Total	2966	100	0,59

Côte d'Ivoire has registered an annual average of 6.000 working accidents between 2015 and 2017. The "Caisse National de Prevoyance Social" announced a "Vision zero" in April 2019 in the form of seven golden rules.

SIPH, the largest producer of latex in Côte d'Ivoire has a policy on health and safety, with the purpose of recording working accidents, having safe working tools, lodging workers, treatment of a variety of non-work related diseases like AIDS and to engage in dialogue with local communities on health and education.

SOCFIN, the second largest producer of latex in Côte d'Ivoire follow the OHSAS 18001 occupational health and safety standard. SOCFIN reported in 2018 18,91 injuries / 200.000 hours, an increase of 58 % compared to 2017, explained by better recording of minor accidents and increased awareness. The increase in declaration of accidents has the advantage that the accidents are better known and then training awareness session are better targeted.

SIAT group, being ISO 9001 certified, reported 3,4-13,7 injuries per 200.00 hours in 2017 and 3,0-32,6 injuries per 200.000 hours in 2018 – with a max. acceptable allowance of 15 injuries per 200.000 hours.

Description of Risk

In Côte d'Ivoire there is a new law in place with new positive visions for zero accidents. The annual number of accidents is generally high but dark figures are uncertain as experiences from certified plantations reveal that workers have been reluctant to report accidents.

Based on the foregoing this indicator is assessed as specified risk.

Means of

- Existing legal framework and level of governance
- Records of training and accidents
- Interview with staff

Verifica tion	
Eviden ce Review ed	<ul style="list-style-type: none"> Code du travail, edition 2017, https://www.ilo.org/dyn/legosh/en/f?p=14100:1100:0::NO::P1100_ISO_CODE3,P1100_SUBCODE_CODE,P1100_YEAR:CIV,,2013 Caisse Nationale de Prevoyance Sociale http://www.cnps.ci/Pages/Default.aspx Thesis on accidents from 20015 https://www.memoireonline.com/06/06/174/etude-facteurs-explicatifs-survenue-accidents-travail-entreprises-cote-divoire.html SIPH http://siph.wipiv.com/titre-developpement-durable?language=en#tabs-2 SOCFIN 2018: "Rapport Développement Durable 2018 – l’agriculture responsable tropicale" SOCFIN SIAT 2018: "Rapport Développement Durable 2018" SIAT Group
Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comm ent or Mitigati on Measur e	<p>SBIOCI employ local workers directly, all personal are trained according to health and safety requirements by "Code de travail" and operators of vital equipment is trained.</p> <p>The mitigation measure is 1: A. SBIOCI on boarding training program</p> <p>Mitigation measures will be implemented on the harvest operation</p> <p>Regarding A : SBIOCI on-boarding training program</p> <p>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.</p> <ul style="list-style-type: none"> ○ Training records

	Indicator
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.

<p>Finding</p>	<p>The amount of carbon and biodiversity stored within an area of land varies according to the type of vegetative cover. The HCS Approach stratifies the vegetation in an area of land into six different classes using analyses of satellite data and ground survey measurements. These six classes are: High Density Forest, Medium Density Forest, Low Density Forest, Young Regenerating Forest, Scrub, and Cleared/ Open Land. The first four classes are considered potential High Carbon Stock forests</p> <p>SBIOCI assess that the risk of sourcing from high carbon stock areas is directly related to the risk of sourcing from natural forest converted to new rubber plantations. Therefore, if any supplier establishes new plantations on such site mentioned above, the biomass from such a supplier cannot be considered compliant</p> <p>Risk Assessment Based on the foregoing this indicator is assessed as specified risk.</p>
<p>Means of Verification</p>	<ul style="list-style-type: none"> • Reports on deforestation • Historical maps, reports and enquiries with stakeholders • Tree diameter and growth schemes for rubberwood
<p>Evidence Reviewed</p>	<ul style="list-style-type: none"> • http://highcarbonstock.org/further-resources/hcsa-application-and-trials-dashboard/ • REDD+ (2017) : Données Forestières de Base Pour La REDD+ en Côte d'Ivoire – Inventaire de la biomasse forestière pour l'estimation des facteurs d'émission. L'organisation des Nations Unies pour l'alimentation et l'agriculture, Abidjan 2017 • FAO et SEPREDD+, (2017): Données Forestières de base pour la REDD+ en Côte d'Ivoire. Cartographie de la dynamique forestière de 1986 à 2015 • http://www.commodafrica.com/23-10-2018-irc-2018-la-production-de-caoutchouc-en-cote-divoire-triplera-dici-2023-2-mt • http://www.aidenvironment.org/wp-content/uploads/2016/10/Rubber-study-FRA.pdf • https://www.frontiersin.org/articles/10.3389/fenvs.2019.00073/full
<p>Risk Rating</p>	<p><input type="checkbox"/> Low Risk X Specified Risk <input type="checkbox"/> Unspecified Risk at RA</p>
<p>Comment or Mitigation Measure</p>	<p>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.</p> <p>Mitigation measures will be implemented on the supplier.</p> <p>Within each group indications of conversions will be analysed. The groups are analysed in the following order.</p> <ol style="list-style-type: none"> 1. CONTRACT (A) If contract negotiations initially lead to no indications of conversion continue to 2. 2. TITRE FONCIER (B) If inspection of titre foncier + cadasteral map lead to no indication of conversion continue to 3. 3. HISTORICAL REPORTS AND MAPS (C) if inspection of historical reports and maps lead to no indication of conversion continue to 4. 4. CONSULTATION WITH COMMUNITIES (E) if consultation with communities lead to no indication of conversion continue to 5. 5. CONSULTATION WITH MANAGEMENT. The management is questioned about indications found during step 2-4, if management by document can support that there is low risk related to the indications then SBIOCI assess low risk for conversion. If documentation is weak continue to 6 and/or 7.

6. FIELD inspections (D). If no indications are found for conversion it is concluded that there is low risk of conversion.
7. AGROFORESTRY/OTHER MANAGED LAND INVESTIGATION. If there is uncertainty about conversion of agroforestry/other managed land versus forested land this shall be investigated and documented i) by community consultations (E); ii) by examining available reports of impact assessment and similar and iii) by interviewing staff in the environmental department (or similar) about the former status of the land. If investigations and documentation conclude that agroforested/other managed land has been converted then the overall conclusion is low risk of conversion. If investigations and documentation conclude that forest has been converted then the overall conclusion is exclusion of 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 + if available cadastral map) of the supplier:

- Copy of full land title (Titre foncier / certificat foncier + if available cadastral map) 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							

Indications for conversion 1: decline in Forêt classée, biodiversity area, forest area.

Indications for conversion 2: expansion in rubber plantation; other agricultural area; housing and factory area

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)
- Indications of low risk: Landuse of neighbouring land in 2008, agriculture or plantation with rubber, oil palm, cocoa, cashew.
- Indications of conversion: Landuse of neighbouring land in 2008: forestry; tree stumps inside plantation with diameter of 80+ cm’s

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

- If the supplier has 1 plantation then the nearest communities shall be consulted.
- If the supplier has 2 and up plantations then the nearest communities of the plantation with harvest operation shall be consulted. Furthermore, for each of the plantations without harvest operation the main community will as a minimum be consulted
- 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.
- Low risk indications for conversion: use as farmland or agroforestry (e.g. with cocoa, cashew, oil palm trees in combination with agriculture), sale of non-forest products.
- Indications of conversion: independent memories of the same specified forested land allocations being converted after 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.

	<ul style="list-style-type: none"> • 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. <p>Questionnaires to be saved for 5 years</p> <p>Conversion of rubber plantations or compartments to urban development projects will be assessed by:</p> <ul style="list-style-type: none"> • 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.
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	Indicator
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.
Finding	<p>Carbon sequestration in rubberwood plantations has been analysed in the following study: “Potential carbon sequestration in rubber tree plantations in the north-western region of the Parana State, Brazil, 2014. The publication has the following conclusion:</p> <ul style="list-style-type: none"> • Rubber tree plantations may improve the soil's physical and chemical properties, and they may sequester atmospheric carbon in the biomass or the soil. However, the potential role of these plantations in sequestering carbon in the soil and plant biomass has not been fully evaluated. This study evaluated rubber tree plantations at Paranapoema, which is located in the north-western region of the Parana state of Brazil, to measure the biomass in plantations of different ages and to determine the organic carbon content and delta C-13 in the soils. Biomass accumulation was evaluated using the destructive method in plantations of different ages. The total carbon stock in the top 60 cm of the soil was 63.4 Mg C ha(-1) for the pasture adjacent to the plantations and 66.8 and 79.3 Mg C ha(-1) for the 4- and 15-year-old rubber tree plantations, respectively. These values are equivalent to an annual increase in soil carbon stocks of 0.85 and 1.06 Mg ha(-1), respectively, and they do not include the accumulation of carbon as tree woody biomass. The soil delta C-13 indicated a relatively fast conversion from the previous C4-C (pasture; Brachiaria-Urochloa brizantha) to C3-C (rubber tree). The results from this study suggest that rubber tree plantations have untapped potential to sequester carbon over a relatively short time period. <p>The study above does not indicate if the roots are left to rot or are removed, and on this basis, it is assess that best practice is to leave the roots in the plantation</p> <p>Risk description Shortly (<1 year) after SBIOCI has removed the stems, the plantations replant the compartments in order to maintain a steady production of latex – this also assures that the</p>

	plantation maintain its function as an effective sink or carbon store. Further, the conclusion from Brazil, that rubber tree plantations have untapped potential to sequester carbon of a relatively short time period, supports an assessment that there is low risk for the present indicator. The conclusion of the indicator is however specified risk as the leaving of the roots in the compartment is considered best practise for the plantation to remain an effective sink of carbon over the long term.
Means of Verification	<ul style="list-style-type: none"> • Results of analysis of carbon stock • Analysis of historic and present carbon uptake rates
Evidence Reviewed	<ul style="list-style-type: none"> • Potential carbon sequestration in rubber tree plantations in the north-western region of the Parana State, Brazil. AU - Regina Maggiotto, Selma; AU - De Oliveira, Dalziza; AU - Jamil Marur, Celso; AU - Maria Soares Stivari, Sonia; AU - Leclerc, Monique; AU - Wagner-Riddle, Claudia; PY - 2014/04/01; DO - 10.4025/actasciagron.v36i2.17404; JO - Acta Scientiarum Agronomy
Risk Rating	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	<p>The mitigation measures are divided in 3: A. Contract with seller; B. Pre-harvest meeting; C. Post-harvest control</p> <p>Mitigation measures will be implemented on the plantation</p> <p>Regarding A, contract with seller</p> <ul style="list-style-type: none"> • SELLER guarantees, that roots not extracted are not burned but left to rot and decay. <p>Regarding B, pre-harvest meeting</p> <ul style="list-style-type: none"> • Pre-harvest meeting, training to leave the roots in the plantation • Signed instruction document. <p>Regarding C, post-harvest control</p> <ul style="list-style-type: none"> • On-site inspection, confirming that roots are left in piles covered with a minor layer of soil. • Signed report

	Indicator
2.10.1	Genetically modified trees are not used.
Finding	<p>According to FAO (2010) Côte d'Ivoire did not have a production of genetically modified rubberwood in 2010.</p> <p>Cote d'Ivoire ratified the Cartagena Protocol on Biosafety to the Convention on Biological Diversity in 2015.</p> <p>On the basis of the above this indicator is rated as low risk.</p>

Means of Verification	<ul style="list-style-type: none"> • Internet • Literature and research • Ratification
Evidence Reviewed	<ul style="list-style-type: none"> • https://bch.cbd.int/about/countryprofile.shtml?country=cj • http://www.fao.org/3/i2490e/i2490e04d.pdf • https://www.devex.com/news/what-are-the-political-drivers-for-gmos-in-developing-countries-92091
Risk Rating	<input checked="" type="checkbox"/> Low Risk <input type="checkbox"/> Specified Risk <input type="checkbox"/> Unspecified Risk at RA
Comment or Mitigation Measure	