



THIS PUBLICATION
HAS BEEN
PUBLISHED IN
PARTNERSHIP BY:



REPORT

MARCH
2012

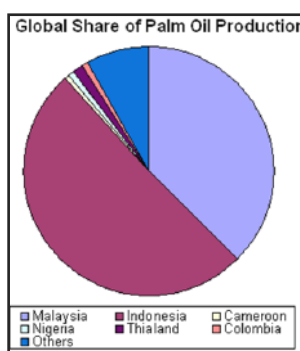
Oil Palm Development in Cameroon

An ad hoc working paper prepared by
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SUMMARY

CONTEXT

Palm oil (*Elæisguineensis*) is a plant native to the countries bordering the Gulf of Guinea. Extracted from the pulp of the fruit, palm oil is rich in fatty saturated acids, and solid at room temperature. As all vegetable oils, palm oil does not contain cholesterol.



Palm oil, with an annual global production of 50 million tons, equating to 39% of world production of vegetable oils, has become the most important vegetable oil globally, greatly exceeding soybean, rapeseed and sunflower (USDA, 2011). More than 14 million hectares of oil palm have been planted across the tropics. Palm oil is a highly profitable product for the producers; the industry is worth at least USD 20 billion annually. Palm oil is a common cooking ingredient in the tropical belt of Africa, Southeast Asia and parts of Brazil. In addition to palm oil extracted from the pericarp, *Elæisguineensis* also produces palm kernel oil extracted from the endosperm which is mainly used in the cosmetics industry. Palm kernel waste (after the oil has been extracted) is also used as animal feed and in co-firing in electricity generation. In 2011, Malaysia (18.7M tons) and Indonesia (25.4 M tons) count for 87% of the world's palm oil production of 50 million tons, with very few other countries producing even one million tons – see figure 1. In Africa the main producers are Nigeria, DRC, Ghana and Ivory Coast. Cameroon currently (2010) produces an estimated 210,000 tons annually and is the World's 15th largest producer (MinADER, 2010).

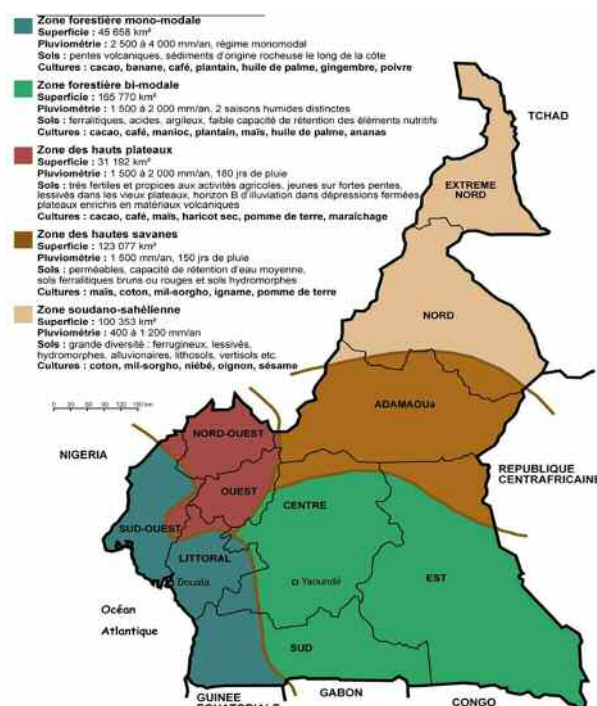
Palm oil can produce high yields when grown under the right biophysical conditions (Better Crops International, 1999):

- High temperatures all year round, between 25-28° C;
- Sufficient sunshine: at least 5 hours of sun per day;
- High precipitation: evenly distributed rainfall 1,800 – 2,400 mm / year without dry spells for more than 90 days. Higher rainfall can be tolerated as long as soils are well drained;
- Soils: prefers rich, free draining soils, but can also adapt to poor soils with adequate use of fertilizer, and
- Low altitude: ideally below 500m a.s.l.

Many regions in Cameroon meet these required biophysical conditions particularly the southern forest zone. South-West, South and Littoral are the most attractive regions for investors.

Under good ecological conditions a well-managed oil palm plantation can produce up to 7.2 tons of crude palm oil (CPO) (and 1.5 tons of palm kernel oil (PKO)) (PT. Smart

Figure 2: Biogeographical regions of Cameroon (Source: IRAD and Cameroon Statistics Directory – 2000.)



Indonesia, 2010), although the industrial average is closer to 4.0 tons CPO/hectare. For comparison, rapeseed, soybean, sunflower, and maize - crops often heralded as top biofuel sources - generate only 0.7, 0.4, 0.5, and 0.2 tons per hectare on average, respectively.

In comparison to Southeast Asia, current yields are extremely low in Cameroon, roughly 2.3 tons CPO / ha / year in the agro-industry¹ and 0.8 tons CPO /ha / year in smallholdings.

Principal drivers of oil palm expansion

Over the past few years the global demand for palm oil has significantly increased and has gained a significant market share against other less accessible and more expensive vegetable oils, such as soy. This expansion is due to increased consumption in China, India and other emerging Asian economies where palm oil is used extensively as a cooking oil. Currently, global palm oil demand exceeds supply, a trend that is likely to continue into the foreseeable future, making it particularly attractive for investors.

The same trend is observed in Cameroon, a net importer of palm oil². Moreover, increasing regulations preventing the clearing of forests, land shortages, increased scrutiny of land acquisitions and the hopes raised by the Reduced Emissions from Deforestation and Degradation (REDD) mechanism in the major producing countries of Malaysia and Indonesia, is encouraging large Asian companies to diversify their production areas and to heavily invest in Central Africa.

Cameroon is a target country for several reasons³, including the presence of good biophysical conditions (see above); availability of cheap land; political stability and the willingness of the Cameroonian government to develop its agricultural sector. Finally, the country is closer to the traditionally high value markets of Europe and North America where palm oil is used in manufactured goods rather than as a cheap cooking oil.

¹ There is variation in yields across the different companies, the average yields vary between 1.0 t and 3.9 t CPO/ ha/yr.

² In 2010, the output gap was 50 000 t, for an estimated total production of 210,000 t.

³ Pressure from international investors is not limited to the palm oil sector in Cameroon. A recent study of the ILC (International Land Coalition) provided an update on major agro-industrial projects worldwide. f. Anseeuw, W., L. Alden Wily, L. Cotula and M. Taylor (2012). "Land Rights and the Rush for Land: Findings of the Global Commercial Pressures on Land. Research Project". ILC, Rome. <http://www.landcoalition.org/fr/node/>

PALM OIL DEVELOPMENT IN CAMEROON

Industrial production of palm oil is not new to Cameroon. The first commercial plantations were established in 1907 under the German colonial administration in the coastal plains, around Mt. Cameroon and Edea. The crop was further developed under the Franco-British regime until 1960 when it had reached an estimated production of 42,500 tons. After Independence, the government of Cameroon took over the production of palm oil with the creation of public sector companies like Société des Palmeraies (which later became SOCAPALM), PAMOL and CDC.

According to the Ministry of Agriculture and Rural Development (MINADER), Cameroon produced 210,000 tons of crude palm oil in 2010, across an estate of approximately 190,000 hectare. Production of palm oil in Cameroon is distributed across three plantation types or scales:

- Agro-industrial plantations (58,860 ha producing 120,000 tons);
- Supervised smallholder plantations (35,000 ha producing 30,000 tons), and
- Independent smallholdings (occupying an estimated 100,000 ha producing approximately 80,000 tons of palm oil ⁴).

The Government of Cameroon's Rural Sector Development Plan proposes an increase in palm oil production to 300,000 tons in 2015 and 450,000 tons in 2020. This can be achieved primarily through increasing oil production yields, as well as potentially increasing the area under oil palm production and by increasing oil extraction rates. The Government's plan is focused mainly on the area under production targets and not on yields or any environmental or biodiversity impacts.

Currently, agro-industrial palm oil plantations and the industrial transformation of palm oil in Cameroon are carried out by five large companies: The French group Bollore has three companies including - SOCAPALM (28,027 ha), SAFACAM (4,870 ha) and the Swiss Farm (3,793 ha); the other two companies belong to the State: CDC (12,670 ha) and PAMOL (9,500 ha).

Industrial palm oil production is an integral element in the government's growth, employment and poverty reduction policies. The 1994 New Agricultural Policy of MINADER (Agriculture) states that there is a need for increased investment in agro-industry through privatization of existing public institutions and the creation of new agro-industrial plantations, including oil palm. Therefore, the industrial production of palm oil is a national priority initially to meet domestic demand and secondly, for export.



⁴ Estimates of the area and production of independent smallholdings made by MINADER are really a crude estimate, as no reliable data exist.

Current expansion of palm oil in Cameroon

Due to increased global demand for palm oil and suitable conditions for oil palm development, Cameroon has witnessed a sharp rise in investor enquiries seeking land to plant oil palms since 2009. It is believed that at least 6 companies are currently trying to secure over 1 million hectare of land for the production of palm oil in the southern forested zone ⁵.

These include:



Sithe Global Sustainable Oils Cameroon (SGSOC) is a locally registered company in Cameroon, owned by **Herakles Farms**, (affiliate of Herakles Capital), based in New York USA. Herakles Farms acquired 100 percent ownership of SG Sustainable Oils from Sithe Global, an affiliate of the Blackstone Group, in 2009.

Since 2009, SGSOC has been trying to secure a large tract of land in the range of 100,000+ ha in the SW Region of Cameroon to develop a large oil palm plantation. SGSOC is currently in the process of finalizing the acquisition of a total of 73,086 ha (30,600 ha in Ndiang Division and 42,600 ha in Kupe-Muanenguba Division). The site of this proposed plantation lies inside a globally recognized biodiversity hotspot between the internationally important protected areas of Korup National Park, Rumpi Hills Forest Reserve, Bakossi National Park and Banyang-Mbo Wildlife Sanctuary. These are all key habitats for primates, elephants, buffaloes and a multitude of rare, endemic and IUCN Red-listed species of animals and plants.

In Sept 2009, SGSOC signed a convention with the Government of Cameroon's Ministry of Economy, Planning and Regional Development (MINEPAT). In 2010, SGSOC started the Environmental and Social Impact Assessment for the project. In September 2011, MINEPAT issued SGSOC an Environmental Certificate. SGSOC and Herakles Farms are registered with RSPO ⁶.

www.heraklescapital.com



Sime Darby, a Malaysia-based diversified multinational and the world's biggest listed palm oil producer, is currently in the process of searching for up to 600,000 ha of land in Cameroon to develop oil palm and rubber plantations, across the Centre, South, Littoral and South-west regions. Detailed plans are not yet clear but it is believed that Sime Darby is proposing to develop 300,000 ha of oil palm plantation in Yingui, Nkam Division (adjacent to the proposed Ebo National Park and UFA 00-004); 100,000 ha of rubber in Efoulan, Mvila and 50,000 ha of rubber in Meyomessi, Dja et Lobo Division, as well as others potentially in Mamfe, Sangmelima and Ndikinimeki areas. The project and MoU is still in preparation and the company plans to develop approx. 5,000 ha per year and peak at no more than 15,000 ha per year. The company is a member of RSPO and is willing to cooperate with environmental protection organizations, civil society and the local population. Sime Darby recently rejected one site offered to them by the Government--an intact primary forest near Mintom -- due to its high conservation value.

Financial Times article
www.simedarby.com

⁵ The data presented below are from newspaper articles, websites of companies and information obtained from MINADER, MINFOR, MINDEF officers and others. Some of this information is confidential and its official status is therefore unclear.

⁶ Roundtable on Sustainable Palm Oil (RSPO) is a panel created in 2004, initiated by the palm oil industry and several NGOs including WWF. Its objective is to promote the growth and use of sustainable oil palm products through credible global standards and engagement of stakeholders. The RSPO defines the principles, criteria and indicators to obtain a certification. The Roundtable convenes nearly 600 ordinary members, producers, processors, NGOs, etc. (<http://www.rspo.org>)



SIVA Group/Biopalm Energy is an Indian-owned, Indonesian-registered set of companies. SIVA has a global plan to secure 1 million hectares under oil palm in several countries worldwide. It is seeking at least 200,000 ha in Cameroon (not in one block). It has reportedly already been accorded 50,000 ha in the Ocean Division, with authorization to develop 10,000 ha yearly. One site that SIVA is trying to secure is UFA 00-003 that was gazetted as a forest management unit and managed by MMG.

Reuters article

www.biopalmenergy.biz



In August 2011, **Good Hope Asia Holdings** from Singapore announced its plans to invest several hundreds of millions of dollars in palm oil plantations in Cameroon. They are searching for an unknown quantity of land for palm oil development in Ocean Division, South Region.

bloomberg article

Two further companies: **PalmCo** (requesting at least 100,000 hectares in the Nkam area of Littoral) and **Smart Holdings** (trying to acquire 25,000 ha in an unknown destination). According to MINADER (pers.comm.), there are further undisclosed companies also negotiating with the Government of Cameroon to secure large tracts of suitable land for the production of oil palm and other large-scale agro-industry products (eg. rubber and other biofuels from sunflower and maize).

THE PROS AND CONS OF OIL PALM EXPANSION IN CAMEROON

As demonstrated by the Malaysian and Indonesian experiences, the expansion of palm oil production is an opportunity for national and local economies. When done well, it has a real potential to reduce poverty. An increase in palm oil production in Cameroon is likely to result in a series of positive impacts and benefits for the country.

These include:

- Employment, mainly direct labour on the plantations; and indirect labour (processing, transportation, building, catering, maintenance, etc.). There is little seasonality so employment and other benefits remain steady throughout the year. The economic multiplier effect of creating activities will have a positive impact on the development of all sectors at local and regional level;
- **Revenue to the State**, through direct taxes, royalties and utility bills, as well as indirect taxes through the labour force. This benefit will depend on how well the State negotiates Cooperation Agreements / Conventions. Correcting the deficit in production of palm oil in Cameroon would reduce the dependence on oil imports, which would, in turn, benefit the country's balance of payments;
- **Infrastructure expansion**, most investors will try to locate their plantations near a sea port, however they will need to invest considerably in upgrading road infrastructure to their sites. Additionally, most reputable investors will invest in social infrastructure for their workforce – housing, water, electricity, health care and education facilities, etc.
- **Smallholder friendly**: oil palm can be economic on a variety of scales, especially for smallholders. Palm oil production is very attractive to smallholders: with few pest and disease threats (so far), low input requirements, and employ of large numbers of workers all year round ⁷. In Southeast Asia, for example, 30 to 40% of palm oil by surface area is the property of smallholders, with high yields and a guaranteed purchase ensured by agro-industries (see inset below). In Cameroon, smallholders control nearly three-quarters of the total area under oil palms but provide only half of the production due to very low yields.

As also demonstrated by the Malaysian and Indonesian cases, the large scale production of palm oil has many disadvantages. When new developments are carried out at the expense of forests, the impacts on the environment, biodiversity and the lives of forest dependent people can potentially be highly negative. Hence, it is important to develop palm oil in such a way to prevent or substantially mitigate such negative social and environmental impacts. The RSPO criteria aim to enhance and maintain important environmental and social values. In the Government of Cameroon's legitimate desire to expand the production of oil palm, they need to develop a best practice guide for new oil palm plantations, as well as identifying the most suitable areas for development through the national land-use planning processes.

⁷ Palm oil responds well to fertilization. The correct use of fertilizer guarantees a good production with yields up to 5-6 t of CPO / ha. In the absence of fertilizer use palm oil still produces, though yields are lower (less than 1 t CPO / ha).



Several potential negative impacts of oil palm development include:

- **Loss of HCV forest and Biodiversity** – Most of the areas in Cameroon suitable for oil palms happen to be covered in intact tropical rainforest, rich in biodiversity and hence important for national and global conservation. A relatively small part of this area has over recent decades been converted for human settlements as well as production (eg. farming and logging). Palm oil investors generally try to avoid developed areas where they would need to negotiate access and pay compensation to the people affected. So they prefer the least populated areas, where the forests, in most cases, are the more bio-diverse. In addition to the direct damage to flora and wildlife habitats due to forest conversion, the influx of migrant workers will increase pressure on wildlife through hunting for the supply of bushmeat;
- **Loss of permanent forest estate** – Forest Management Units (UFAs) & Protected Areas (PA) - The size of the area currently being sought by palm oil companies is not limited to private lands, degraded areas or the non-permanent forest estate. Considering the large number of requests for land, as well as the size of the proposed investments, there is a growing pressure to convert the national forest estate, including forest management units, Council forests and even protected areas. It is reported, but not confirmed, that the State is considering allocating the following places to oil palm: the Campo Ma'an National Park, the proposed Ebo National Park, and the UFAs 00-003 and 00-004 (currently granted to logging companies MMG and TRC respectively). If the government issues oil palm concession licenses in the permanent forest estate by degazetting UFAs and/or protected areas, this opens the door to repeated granting of licenses on the same site and to the permanent sale of the forest estate. Compensation in such cases may outweigh the benefits⁸ of the forest estate conversion;

⁸ Maintaining in extenso the permanent forest estate is not an absolute requirement. However the establishment of a transparent and fair system of compensation should be encouraged if the transactions are to take place to the detriment of local people and / or logging concessions.

- **Social costs** – negative impacts on livelihoods of local people and plantation workers -Agribusinesses currently seeking large tracts of land in Cameroon do not seem willing to involve smallholders in their projects. In the absence of such involvement, large industrial plantations often have negative social impacts on the indigenous populations as well as on the migrant populations. While the working conditions of employees of the company are usually excellent (good quality housing, clinics, schools, scholarships etc.); this does not however apply to workers hired on an ad hoc basis by subcontractors. Their working environment is characterized by poverty, extremely low wages, poor working conditions and housing, etc. Many cases of social conflict and human rights violations have been reported, such as the expropriation of land from neighbouring communities, use of migrant labour as a matter of policy, the forced displacement of indigenous people, the loss of cultural heritage and agriculture, etc. (Ricq, IA 2009, 2010);
- **Environmental costs and risks**–In cases where new developments do not adhere to the highest environmental standards, palm oil production can have major negative environmental consequences on soils (erosion potential on steep slopes, such as in SW region) and water quality (palm oil mill effluent / pollution by pesticide run-off). Green House Gas (GHG) emissions from land-use conversion is a major source of climate emissions; but even without land-use change methane emissions (from mill waste) are another potentially negative aspect, representing approximately 70% of total emissions from the operation of a plantation and mill, which can be problematic in the absence of digesters. While several responsible companies are investing in the minimization of environmental risks, many others do not, sometimes deliberately targeting countries where governance standards are known for their laxity;
- **Opportunity costs to the State:** loss of alternative revenue - The conversion of forest for palm oil production has a potentially huge opportunity cost resulting from the loss of alternative incomes from other proven land-use options (including logging, mining, hunting, NTFP collection etc.) as well as several other potential land-use options (such as conservation concessions, payments for environmental services, REDD+ etc.). All these activities can generate substantial amounts of income to the State, local councils and local communities, as they currently do in Cameroon⁹ under the provisions of the Forestry Law (and regulated by Arrêté 520). These opportunity costs are not currently being considered in the current allocation of land for oil palm development;

Example: In 2009, the Government of Cameroon signed a convention agreement with a foreign palm oil investor, paving the way for the company to gain access to 70,000 ha of forested land to develop an oil palm plantation, with an agreed land tax of half a dollar per hectare per year (~ CFA 250 / ha/yr) for undeveloped land and one dollar per hectare per year once developed (~ CFA 500 / ha/ yr). In the same region logging concessions are paying the State an average land tax of USD18 per hectare per year;

- **Loss of Carbon / Low Carbon development;** some companies are stating that they desire their operations to be carbon neutral – this can be possible but not when natural forest has been cleared to make way for the oil palm plantation (the threshold being 40 tons of carbon per hectare above which carbon neutrality cannot be achieved).

⁹ Independently of government revenue, it should also be discussed the validity of "the presumption of State ownership" particularly in relation to real land rights for people, "profit" cannot alone justify transactions and provide to assess the loss of intangible heritage held by third parties.

The following table shows typical reported emissions for palm oil production based on research conducted for the RSPO in 2009. It shows average emissions of between 4-6 tons of CO₂ equivalent per hectare per year and potential sequestration of over 7 tons per year. As an agricultural crop it can be carbon neutral and indeed a net sequester of carbon, as long as low levels of carbon are cleared to make way for the project. Emissions associated with the conversion of high carbon landscapes – peatlands and forests, even secondary, degraded and shrubland – can be huge and remove any potential carbon savings from sequestration.

Typical GHG emissions from oil palm operations:	(kg CO ₂ -eq/ha/annum)
From operations:	
Fossil fuel use transport & machinery	+180 to + 404
Fertilizer use	+1,500 to +2,000
Palm Oil Mill Effluent decomposition	+2,500 to +4,000
Total operations	+4,180 to +6,225
Emissions from carbon stock change (25 year discounted)	
GHG emission from conversion of grass land/forest	+1,700 to + 25,000
Typical carbon sequestration by oil palms	- 7,660
Typical emissions from oil palm on peat	+18,000 to + 73,000
Total emissions related to carbon stock change	+12,040 to +90,340
Total GHG emissions from oil palm operations:	+16,220 to +96,565

Based on RSPO GHG working group 2009 (www.rspo.org)



HOW TO ENSURE THAT PALM OIL DEVELOPMENT CAN CONTRIBUTE TO SUSTAINABLE DEVELOPMENT IN CAMEROON

If planned carefully, the development of palm oil can lead to strong economic development of the region, as well as a reduction in rural poverty. If not, the extension of palm oil plantations may result in the loss of high conservation value areas and negative impacts on the livelihoods of local communities and indigenous people.

In order to amplify the positive effects and reduce the negative impacts, there is a need for the government of Cameroon and relevant stakeholders to develop a national palm oil strategy that can steer the rapid expansion of the sector and can ensure that expanded production does contribute to Cameroon's sustainable development goals. In order to achieve this it is vital that the government urgently engages all the stakeholders from the outset (including government departments, companies, local communities, international and local NGOs).

The development of palm oil in Cameroon needs to benefit from the experience of major

producing countries by implementing such expansion according to the highest international standards (such as IFC -see box) . The strategy for the proposed expansion of the sector should be characterised by the following considerations:



- Invest in increasing the productivity and yield of the existing oil palm plantations(improved planting materials, improved inputs, improved management of harvesting);
- Ensure that all future palm oil expansion in Cameroon is developed in a sustainable way with minimum impact on carbon emission levels and biodiversity conservation, by focussing on degraded lands;
- Avoid as much as possible the overall reduction of the permanent forest estate with an emphasis on development of areas already deforested or degraded;
- All new oil palm developments in Cameroon should adopt and implement the principles and criteria of the Roundtable for Sustainable Palm Oil (RSPO – see www.rspo.org). The requirement to comply with the RSPO standards for palm oil production in Cameroon should be integrated in national policy and regulations;
- Make sure smallholders benefit from development of agro- industrial complexes, either by establishing outgrower contracts following the currently model in Southeast Asia (where a percentage of at least 30% of the total area is reserved for smallholders), or by establishing measures to support family farming (provision of selected plants, technical support, training, etc.);
- The rights and roles of indigenous peoples and local communities should be respected, notably the adoption of free, prior and informed consent (FPIC), and transparent communication / publicity about any proposed plans to develop new plantations; and
- Special attention should be paid to reviewing the regulations relating to land acquisitions in order to protect and secure local land rights.

IFC Performance Standards

1. Social and Environmental Assessment and Management Systems
2. Labour and Working Conditions
3. Pollution Prevention and Abatement
4. Community Health, Safety and Security
5. Land Acquisition and Involuntary Resettlement
6. Biodiversity Conservation and Sustainable Natural Resource Management
7. Indigenous People
8. Cultural Heritage

<http://www1.ifc.org>

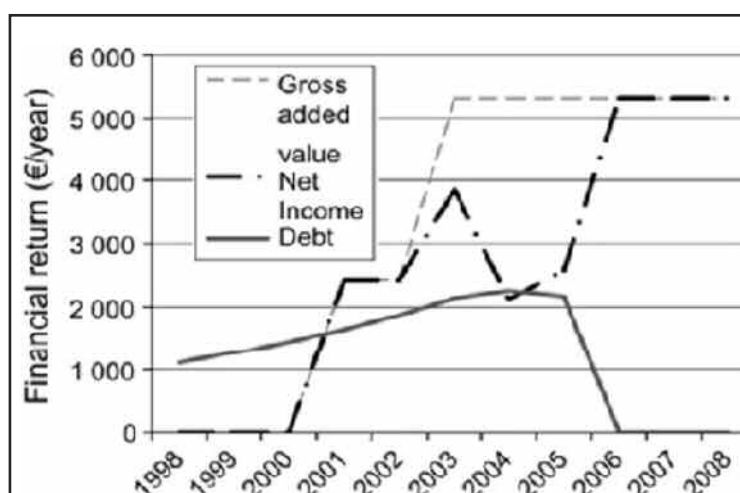
RSPO Principles and Criteria

1. Commitment to transparency
2. Compliance with applicable laws and regulations
3. Commitment to long-term economic and financial viability
4. Use of appropriate best practices by growers and millers
5. Environmental responsibility and conservation of natural resources and biodiversity
6. Responsible conditions of employees and of individuals and communities affected by growers and millers
7. Responsible development of new plantings
8. Commitment to continuous improvements in key areas of activity

www.rspo.org

BOX 1: Successful partnerships between smallholders and companies in South-East Asia

The partnership between companies and smallholders can become a real win-win situation. In MuaraBungo (Sumatra, Indonesia) the conditions offered in 1998 for a smallholding of 2 ha included about 15 MRp of loan (1,225 €) at a 14% interest rate. Repayments began the fifth year after planting at 30% of the monthly net added value. With such a contract, thanks to the high price of palm oil, smallholders took less than 6 years to reimburse their credit. The average returns to land on a full cycle of a plantation were 2,100 €/ha for oil palm, compared to only 200 €/ha for a paddy field. The comparison of returns to labour is even more striking: 36 €/man-day for oil palm, and only 1.7 €/man-day for wet rice (Feintrenie, Chong, and Levang, 2010).



Financial results of a 2 ha oil palm smallholding in a Nucleus Estate and Smallholder scheme

THE WAY FORWARD – TENTATIVE ROADMAP

The development of palm oil investments in Cameroon should be halted until a road map leading to a new Government policy on the expansion of palm oil production is agreed. Or at least, in the absence of such a road map, all relevant stakeholders including indigenous peoples, local communities, NGOs, should be consulted in the decision making on issuing new oil palm concession areas.



In the short term

- The potential to meet the national palm oil deficit by increasing palm oil production yields substantially in existing oil palm plantations should be investigated;
- The potential environmental and social risks of current proposed plantations should be fully assessed by independent assessors, including their impact on greenhouse gas emission levels, biodiversity, local livelihood etc. and a credible risk management plan adopted;
- For each proposed oil palm concession area, an assessment of the presence and absence of high conservation values needs to be conducted, regardless of whether the company is an RSPO member;

In the medium term

- Establish a national oil palm platform to bring together Government, civil society, private sector, donors, NGOs and research institutes in a common forum;
- A new policy must be developed for the sustainable palm oil sector in Cameroon;
- Sensitisation and capacity building around sustainable palm oil best practices for all stakeholders - Introduction to RSPO principles, and ensure the preparation of a national interpretation of RSPO principles and Criteria adapted to the conditions and needs of Cameroon;
- Implement land-use planning processes that balance agro-industry and conservation (including REDD+) ambitions. A national evaluation of HCV areas should be performed, with identification and mapping of areas that could be used to develop oil palm; Agreed land-use plans will need to be enforced;

In the long term

- A Strategic Environmental Assessment for agro-industrial expansion in the forest zone should be carried out;
- Appropriate and realistic environmental management measures vis-à-vis the risks associated with palm oil cultivation on an industrial scale should be proposed in a concerted manner; environmental management plans (EMPs) should be developed for each license (current or new);
- The new Government's policy on expansion of palm should be implemented. This authorization shall not include any development of palm oil in areas defined and mapped as protected;
- The process of granting new concessions for palm oil cultivation should be opened, participatory and transparent;
- The tenders for the authorized areas should ensure maximum revenue to the Treasury;
- The awareness of legal issues among NGOs and indigenous communities should be strengthened, and implementation of projects monitored.



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