



Forest Peoples  
Programme



**GREENPEACE**

## **Comments on new planting notice for Goodhope Asia Holdings/PT Nabire Baru.**

### **Review of documents submitted by Goodhope Asia Holdings Ltd as part of the RSPO NPP for PT Nabire Baru, Nabire district, Papua province, Indonesia (including summaries of AMDAL, HCV, and HCS assessments)**

Comments submitted jointly by Pusaka, the Environmental Investigation Agency (EIA), the Forest Peoples Programme (FPP) and Greenpeace.

**Date:** April 7<sup>th</sup>, 2017

**Name of commenter:** Audrey Versteegen, Environmental Investigation Agency (EIA)  
*On behalf of EIA, the Forest Peoples Programme (FPP), Greenpeace and Pusaka.*

**Contact details of commenter**

- *Email:* [audreyversteegen@eia-international.org](mailto:audreyversteegen@eia-international.org)
- *Telephone:* +44 (0) 207 354 7960

**Name of grower:** Goodhope Asia Holdings

**Location of proposed new planting**

- *Country and district:* Indonesia, Papua, Nabire district
- *Project Name:* PT Nabire Baru

## Summary

As the assessments carried out in PT Nabire Baru (PT NB) were open for public consultation in March 2017, the current review by EIA, FPP, Greenpeace and Pusaka was carried out against the requirements of the RSPO New Planting Procedure 2015, which came into force on July 1<sup>st</sup> 2016.

The review found that the documents submitted as part of the RSPO NPP for PT Nabire Baru were not fit for purpose for the following reasons:

1. **Compliance:** The assessments were found to be non-compliant with the requirements of the NPP:
  - a. Soil survey, Greenhouse Gas (GHG) assessment and Land Use Change Analysis (LUCA) are missing.
  - b. Social Impact Assessment (SIA) is out of date.
  - c. The report makes no mention of any process to ensure Free, Prior and Informed Consent (FPIC) was obtained from all local communities impacted by the operations.
2. **Legality:** Between 2010/11 and 2014, the company operated without an Environmental Impact Assessment (AMDAL) – a legal requirement to obtain plantation permits (IUP and HGU). By the time it finally obtained an AMDAL, the company had already cleared large areas of land without approved mitigation management measures in place.
3. **Quality:** The High Conservation Value (HCV) assessment is either of poor quality or deliberately false, with inadequate sampling and fieldwork, and a failure to identify primary forest or peatlands within the concession.

Responsibility for the compliance, factual reliability and quality of the assessments submitted under the NPP lies first and foremost with **the company**.

- In light of the above concerns, we urge the RSPO to issue a Stop Work Order on PT NB until new assessments have been finalised and peer reviewed, and agreement has been reached on compensation / restoration of areas illegally developed or developed in gross violation of RSPO P&C.

In addition, the review found that **the assessor** (in this case Nyoto Santoso) is accountable for the quality and veracity of the assessments he has undertaken.

- In light of the above concerns, we urge the RSPO to request that the HCVRN review his licence and further to require companies that had NPP assessments prepared by him to submit them to the HCVRN for review with a commitment to commission reassessments if found wanting.

Further, the **Certification Body** (in this case BSI) is at fault for signing off on the NPP notification and supporting documents when they are of obvious substandard quality. BSI's misleading statement on the compliance of the documents submitted with the RSPO NPP requirements is typical of most third-party certification bodies' lack of competence and capacity to assess compliance to the RSPO standard identified in EIA's 2015 [Who Watches the Watchmen](#) report. Additionally, BSI seemingly wilfully attempted to pass off the submission as

“ongoing planting”, thereby reducing requirements on the company, which causes us to question whether this occurred as a result of collusion or other misconduct.

- In light of these concerns, we urge the RSPO to prioritise the credible implementation of Resolution 6h and other reforms required to ensure the quality of assessments and the relevance of the standard into the future. We further urge the RSPO to instruct the ASI to investigate the conduct of BSI in the NPP process for PT NB.

Finally, it has come to light that the RSPO knew the documents submitted by GAH for PT Nabire Baru were inadequate. Once it received the NPP submission, the RSPO commissioned an independent review, which found that the assessments were inadequate and should be redone before they could be considered compliant. The **RSPO Secretariat** should never have allowed a non-compliant submission to be published for consultation.

- In light of this, we urge the RSPO BoG to conduct a fully transparent investigation into failings by the Secretariat relating to the posting of the NPP of PT NB/Goodhope and to discipline appropriately any person found to have acted wrongfully. . The investigation should include questioning of any undue influence on the RSPO Secretariat that may have been exercised by Goodhope’s Edi Suhardi.

# I. Comments to Goodhope Asia Holdings

## 1. HCV assessment

The revised RSPO NPP endorsed by the Board of Governors (BoG) came into force on January 1<sup>st</sup> 2016, with a grace period of 6 months for implementation. GAH's NPP submission was posted in March 2017, long after the end of the grace period (July 1<sup>st</sup> 2016), and as such is reviewed against the new NPP requirements.

However, the assessments submitted were carried out before the revision of the NPP, and fall just short of the coming into force of additional requirements. In particular, the HCV assessment was carried out in 2011, revised at the end of 2014, and so the HCV assessor did not need to be licensed under the HCVRN ALS.

*"The Intention is that new oil palm plantings will not negatively impact primary forest, High Conservation Values (HCV), high carbon stocks (HCS), fragile and marginal soils or local people's lands." (RSPO NPP, 2015)*

### a. Incorrect classification of forest quality

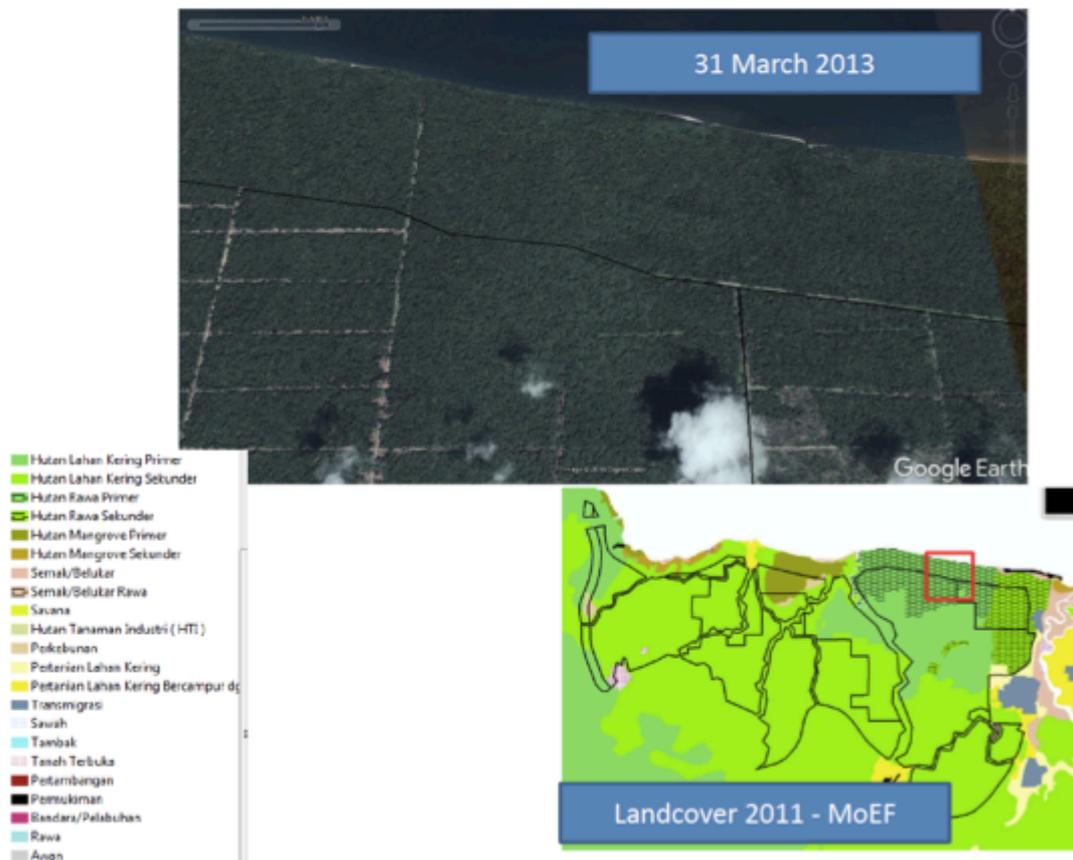
*"The assessment also shows there is no primary forest and peatland in the plantation area of PT Nabire Baru" (HCV assessment for PT Nabire Baru, 2014).*

This statement in the HCV assessment is not backed by any concrete evidence. The HCV assessment does not include a vegetation classification: there is no evidence field surveys were carried out to characterise forest quality within the concession and the list of species included in the annexes to the assessment does not give any indication of the size of trees or surrounding vegetation.

In parallel, national land cover maps, freely available from the Indonesian Ministry of Environment and Forestry, show over a third of PT Nabire Baru's concession forest cover was primary forests in 2011 and 2012 (before any clearance operation started). Landsat images between 2006 and 2013 of areas mapped as primary forests on national maps show dense, closed canopy cover (see photo overleaf). Additional analysis of Landsat images corresponding to the dates of the land cover maps presented in the HCV assessment report show these maps incorrectly classified dense, closed canopy cover as "secondary forests" (see annex).

Independent data sources thus appear to corroborate the presence of good quality forests within the concession before the start of operations. In order for the company to be able to claim due diligence was exercised to prevent the loss of critical environmental values, findings should have been checked by a thorough ground-truthing exercise. There is no evidence this occurred in any of the studies submitted.

On the contrary, the 2014 revised HCV assessment presents an unreliable analysis of 2006 satellite images in its summary, then only refers to 2014 Landsat imagery (when most of the concession had already been cleared) in the full report, thus compounding the likelihood that the destruction of primary forest by the company was deliberately concealed.



## b. False/incomplete identification of biodiversity

The biodiversity assessment carried out to identify HCV1 is incomplete: it is limited to mammals, birds and reptiles and failed to include invertebrates. Time spent in the field could not have been sufficient for the team to adequately assess forest, biodiversity, hold consultations with local communities and draw participatory maps.

The sampling survey for the faunal species that were included in the study is insufficient and does not systematically cover the entire area of the concession. Sampling points are limited to areas that will be set-aside anyway (e.g. riparian zones), giving **absolutely no indication of what fauna could actually be found in the areas that have subsequently been cleared** on the basis of this inadequate assessment.

Further, faunal species that have been listed in the results have specific ranges limited to areas of Papua and West Papua nowhere near the Nabire district. For those species supposedly identified during fieldwork, no more in-depth survey was carried out to describe population size and location of the endangered and critically endangered species the team claims to have found, nor is it established that management measures proposed (small set-asides around sampling points) would be sufficient to preserve these populations.

**c. No identification of local peoples' land or user rights, no mention of FPIC or compensation**

The identification of HCVs 5 and 6 cannot be reliably carried out without mapping local peoples' land and use of natural resources in the landscape, and the location of potential sacred or cultural sites and burial grounds. This mapping should be done in consultation with local populations.

The HCV summary submitted by GAH does not present any participatory map for any of the villages impacted by PT Nabire Baru's operations. The 286 page 2011 HCV assessment – supposedly revised in 2014 – does not once mention the word “*partisipatif*” or “participatory”. No map at all (participatory or not) could be found in any of the documents submitted or studies carried out that would present evidence that customary land or user rights have been identified in or around PT Nabire Baru's concession.

None of the documents (summaries or full assessments) present evidence that any stakeholder (international, national or local) have been consulted. They do not include any meeting minutes or presence lists, no account of any information that should have been shared with local communities about the operations before their start, nor any feedback or comment received in response.

No document makes any mention of whether consent was given by communities for PT Nabire Baru's operations on their land.

Finally, no mention is made of the current and open complaint against Goodhope PT Nabire Baru, filed in April 2016 – nearly one year before the NPP submission was posted on the RSPO website, which was officially accepted by the RSPO in December 2016. This complaint crucially includes grievances from local communities impacted by land clearance and operations to date, carried out without their consent or fair compensation.

**2. No soil survey – missed identification of peat areas**

*“7.4.1 Maps identifying marginal and fragile soils, including excessive gradients and peat soils, shall be available and used to identify areas to be avoided”  
(RSPO P&C, 2013)*

PT Nabire Baru failed to carry out a soil survey before starting its operations, thereby failing to ensure that their oil palm plantation would not be developed on, or negatively impact (i.e. lead to drainage) of a peat area. GAH admitted that it only commissioned one in March 2017. Official government maps (by the Ministry of Environment and Forestry) label an area within the concession '*kesatuan hidrologi gambut*'. Due diligence by the company would require a thorough check to ensure plantation has not been developed on peat.

*“Criterion 7.8: requires that new plantation developments are designed to minimise net Greenhouse Gas (GHG) emissions, taking into account avoidance of land areas with high carbon stocks (HCS) and/or sequestration options”(RSPO NPP, 2015)*

While an HCS assessment is not formally required as part of the NPP submission, it should be carried out to comply with Criterion 7.8 of the RSPO P&C, and **reported on publicly (as part of the NPP submission) from January 1<sup>st</sup> 2017**. The HCS assessment commissioned by GAH (also led by Nyoto Santoso) fails to make any mention of peat, and only counts 18 sampling points in the field. None of the soil samples were tested for organic content, only the living vegetation, leaf litter (*serasah*) and decaying trees (*nekromassa*) were sampled. There is no evidence that the team even looked for peat to ensure adequate management measures.

Additionally, the HCS assessment was carried out on the basis of land cover in 2014, when close to half of the plantation had already been cleared, some of it already planted with oil palm.

### 3. Non-compliance with RSPO procedures and certification requirements

Even if the above assessments could be found to be of appropriate quality, GAH's NPP submission for PT Nabire Baru falls short of RSPO requirements for the following reasons:

#### a. Assessments/Information missing

- Evidence of stakeholder consultations after the HCV assessment, summary of feedback and comments, and how they were addressed.
- GHG assessment. As of January 1<sup>st</sup> 2017, GAH needs to report on this publicly as part of the NPP submission, and not to ERWG only. The statement by BSI (certification body) is misleading.
- Soil survey.
- LUC analysis. *"A land use change (LUC) analysis should use historical remote sensing imagery (of land cover) to demonstrate there has been no conversion of primary forest or any area required to maintain or enhance HCVs since November 2005"* (RSPO NPP, 2015). It is incomplete in the current submission (starts in 2006), it does not use satellite imagery and does not make any conclusion as to the status of HCV areas.
- FPIC process.

#### b. Assessments out of date

*"If the SEIA report is older than three years at the point of NPP submission, it should be reviewed and updated to reflect changes on the ground and must also meet any new RSPO requirements"* (RSPO NPP, 2015)

The SIA submitted for PT Nabire Baru was carried out in 2011, 6 years before the NPP submission for public consultation, 4 years before the NPP submission to RSPO for review (allegedly in 2015). It is not admissible until it has been updated by a competent assessor. This is especially important as no other social engagement appears to have been conducted by the company (cf. comment on FPIC), and given the open complaint against PT Nabire Baru's operations filed by the local communities in April 2016.

#### c. Late NPP submission (2.5 years late)

Land clearance in PT Nabire Baru started in 2011. However, GAH only became a member of the RSPO on December 2<sup>nd</sup> 2014.

Consequently, the two following requirements apply to the concession:

- For land cleared between 2011 and December 2<sup>nd</sup> 2014  
*"If land clearance occurred after 1 January 2010: If land was developed after 1 January 2010 and did not comply with NPP requirements the grower has to ensure compliance with Principle 7 at the time of certification. This may be the case if land clearance occurred before the grower became an RSPO member or for any new acquisitions where clearing and development have already taken place."* (RSPO NPP, 2015)

- For land cleared from December 2<sup>nd</sup> 2014  
*“New land acquisitions by RSPO members: If land clearing is actively occurring at the time of acquisition, operations must cease completely and the NPP requirements shall be followed for any area that has not yet been converted.” (RSPO NPP, 2015)*

All RSPO requirements applied to Goodhope from the moment they became a member of the RSPO on December 2<sup>nd</sup> 2014. On that date, operations in PT Nabire Baru’s concession should have been stopped until the RSPO NPP process was completed.

The RSPO NPP requires assessments should be carried out, verified by a certification body and the RSPO Secretariat, and finally open for wider public consultation. Crucially, only after the end of the public consultation and any comment received have been satisfactorily answered can operations begin.

*“Once verified and approved by a CB [certification body], a final NPP report is submitted to RSPO for a 30-day public consultation period. On satisfactory completion of the 30-day period and resolution of any comments, the RSPO Secretariat will approve the proposed new plantings.” (RSPO NPP, 2015)*

*“Planting and any associated development (such as road development) can only begin once the NPP is completed and RSPO approval is granted.” (RSPO NPP, 2015)*

*“The party who submitted a comment has the final say on whether and when the subject of their comment can be considered resolved.” (RSPO NPP, 2015)*

It is consequently irrelevant whether assessments were carried out before the start of the operations in 2011: the company had to complete the NPP process before clearing land, or be at risk of not being compliant with RSPO requirements for certification. Any clearance between December 2014 and present day (identifiable using historical satellite images) is in contravention of RSPO P&C. Having disregarded the requirements of their RSPO membership and the NPP for over 2 years, GAH’s operations in Papua should not be eligible for certification.

It should be noted that GAH has mentioned “bottlenecks” in the RSPO processes as a justification for not waiting for RSPO approval of their NPP submission for PT Nabire Baru before continuing their operations. It uses the same justification – lengthy approval process for the AMDAL at the provincial environmental agency level – to explain why their operations started illegally and remained so for three years before they retrospectively regularised their permits and could apply for RSPO membership in 2014.

#### **d. PT Sariwana Adi Perkasa**

Most comments made in this document are also applicable to PT Nabire Baru’s sister and neighbouring concession: PT Sariwana Adi Perkasa, also a subsidiary of GAH’s, which is currently being cleared without the NPP process having been completed.

We are aware that a similar NPP application was submitted to the RSPO for PT SAP, and is currently under review. We will submit comments as soon as it is open for public consultation.

## 4. Recommendations on Goodhope

- All operations are stopped at PT Nabire Baru until new assessments have been finalised and peer reviewed, and agreement has been reached on compensation / restoration of areas illegally developed or developed in gross violation of RSPO P&C.
- The resolution of the open complaint against PT Nabire Baru is given priority until the local communities impacted have received a fair and agreed settlement.
- The FPIC process is restarted and operations do not commence until the local communities impacted have given their clear consent. If they do not give consent, GAH must respect their choice.
- All required assessments are redone following the RSPO NPP 2015 requirements. This must include at a minimum (i) HCV assessment led by HCVRN ALS licensed assessor following HCVRN ALS rules, (ii) detailed credible soil survey, (iii) public report of GHG assessment including credible HCS assessment, (iv) LUCA since November 2005, (v) FPIC.
- GAH's RSPO membership is suspended until compensation has been estimated and paid for all land cleared in contravention of RSPO requirements.
- Edi Suhardi should recuse himself from the Assurance Task Force Steering Group and any discussions about NPPs and complaints procedures at the Board until these matters are resolved.
- The same process is followed for PT Sariwana Adi Perkasa – following the recommendations of the independent review commissioned by the RSPO Secretariat.

## II. Comments on assessors and auditors

### 1. HCV assessor: Nyoto Santoso

As detailed in our comments on the NPP notification for PT Nabire Baru (Goodhope Asia Holdings), the corresponding HCV assessment is either lazy or deliberately false, including fake information such as lists of species obviously not found in the vicinity of the concession. Goodhope Asia Holdings (GAH) suggests that as Nyoto Santoso was included on the list of RSPO approved HCV assessors, and is now an HCVRN ALS provisionally licensed HCV assessor, the conclusions of the assessments are valid.

While on paper Nyoto Santoso has the required approvals to conduct HCV assessments for RSPO certification, the quality of the HCV assessments he has produced has never been formally reviewed. A number of his assessments have been reviewed independently by environmental NGOs and systematically show the same flaws as the assessment included in PT Nabire Baru's NPP submission: insufficient time in the field, inadequate sampling, no description of vegetation classes, no credible lists of species, and HCVs only described in areas that would be protected anyway under Indonesian law (e.g. riparian zones).

Regarding Nyoto Santoso's provisional HCVRN ALS license, it was obtained after the HCV assessment for PT Nabire Baru, which was carried out a few months before the entry into force of the RSPO new requirement for HCVRN licensed assessors as part of the NPP, thus avoiding to have to follow the HCVRN ALS rules and quality control.

Since acquiring his provisional licence in December 2014, Nyoto Santoso has not submitted one HCV assessment to the HCVRN, making it impossible to rely on any formal independent review to give an indication as to his capacity as an HCV assessor.

Several HCV assessments led by Nyoto Santoso have however been reviewed on an *ad hoc* basis by different organisations. In particular, the two studies he led for the two subsidiaries of the Noble Group, PT Henrison Inti Persada and PT Pusaka Agro Lestari located in the province of West Papua, were reviewed by the Council on Ethics of the Norwegian Government Pension Fund Global (GPFJ). The reviewers noted similar faults to those found in the present HCV assessment and concluded that there was a non-negligible risk that any HCV potentially present in the concessions would not have been identified and the potential for “severe environmental damage”. Nyoto Santoso’s HCV assessments were found of such poor quality, that all GPFJ shares in Noble Group were immediately divested.

It should then be noted that an independent review of the HCV assessment was commissioned by the RSPO when GAH submitted its NPP application for PT Nabire Baru. The reviewers found the NPP application to be of unacceptably poor quality, and recommended all the assessments be redone before the RSPO should accept or publish GAH’s NPP submission. It is the RSPO Secretariat’s duty and responsibility to act on these recommendations. Indeed, in an RSPO document from January 2017, it is stated that a revision would be recommended if necessary – why this was not acted upon is unclear.

## **2. Certification body: BSI**

*“The auditor conclude that the SEI (AMDAL), SIA and HCV Assessment were comprehensive, detailed and professionally carried out.” (Verification statement by BSI, NPP notification for PT Nabire Baru)*

The certification body hired by GAH to verify the NPP submission for PT Nabire Baru was BSI Services Malaysia Sdn Bhd (BSI).

It is noted that the document was verified by BSI before the entry into force of the revised NPP. However most of the shortcomings of the submission highlighted in our comments on PT Nabire Baru’s NPP notification were also requirements under the original NPP and should have been picked up by the certification body.

BSI instead issued the broad verification statement quoted above without noting any of the fundamental flaws presented in this review (see Section I).

Other statements by BSI were found to be false, such as classifying PT Nabire Baru’s operations as ongoing “*Based on review of new planting plan, it was noted that this part of an on-going planting is meant for notification only*”. As evidenced in section 1.3.c of our comments on PT Nabire Baru’s NPP notification, BSI does not appear to have either the capacity or competence to check the compliance of palm oil producers against the requirements of the RSPO standard. Verification statements such as the one provided by BSI for PT Nabire Baru have been found to be a systemic issue in the RSPO system, and formed the basis of the report [Who Watches the Watchmen](#) produced in 2015 by EIA and Grassroots, which spurred the RSPO membership to vote in Resolution 6h (proposed by FPP) in the RSPO November 2015 General Assembly.

Resolution 6h gave mandate to the RSPO Secretariat to reform the RSPO certification systems in order to guarantee better HCV assessments, FPIC processes, as well as general audit performance, in particular at the early stage of NPP verification.

As part of Resolution 6h, current accredited auditors were assessed by Accreditation Systems International (ASI) in 2016. **In all ASI's assessments BSI scored major non compliances in enforcing the RSPO standard.**

Since November 2015, very little progress has been made by the RSPO Secretariat to improve the performance of RSPO certification bodies, resulting in a lack of enforcement of the standard, perfectly illustrated by the PT Nabire Baru case.

### 3. Recommendations

- RSPO Board of Governors to request that the HCVRN review the licence of Nyoto Santoso and further to require companies that had NPP assessments prepared by him to submit them to the HCVRN for review with a commitment to redo if found wanting.
- RSPO BoG to instruct ASI to investigate the NPP process at PT NB, including the conduct of BSI.

## III. Comments on the RSPO Secretariat for its Board of Governors

### 1. Lack of quality control

*“On receipt, the RSPO checks that the submission is complete and within ten working days, posts the notification on RSPO website for a period of 30 days (See Annex 2). **The notification will not be uploaded to the RSPO website if submission is found to be incomplete.** The ten working days required by the Secretariat to process the NPP submission and to upload it on the website is only indicative and subject to the completeness of the submission and the timeliness of the grower and/or CB in **addressing any issues raised by the Secretariat.**” (RSPO NPP, 2015)*

The RSPO has admitted commissioning an external review of the full assessments submitted as part of the NPP for PT Nabire Baru. The external reviewer recommended that the assessments should be redone before the NPP could be accepted. The RSPO Secretariat then proceeded to ignore these recommendations and still posted the NPP notification for public consultation, reportedly following a request by GAH for the RSPO Secretariat to do so.

While it may be the right of the company to make that request, it should be the duty of the RSPO to follow its own procedures and uphold the credibility of its standards by not granting that request when documents submitted by one of their members are so obviously substandard to their own requirements.

Insufficient quality control by the RSPO Secretariat appears to be getting increasingly frequent: as private sector members make for an ever increasing proportion of the RSPO membership base, and the voice of environmental and social concerns gets drowned. Such pandering to private sector wishes, in obvious breach of the requirements of the standard, puts the entire organisation's credibility at serious risk.

## **2. Conflict of Interest**

Pak Edi Suhardi is the Director of Sustainability of one of GAH's wholly owned subsidiaries. He is the Chair of the Caucus of Indonesian grower members of the RSPO and the Vice President of the RSPO Board of Governors. In those positions there are concerns over Pak Edi Suhardi's potential to unduly influence Secretariat decision-making to favour the company he works for. At the very least, this appearance of conflict of interest risks undermining public confidence in the integrity of the RSPO and its procedures.

Additionally, Pak Edi Suhardi now sits on the Steering Group of the Resolution 6h (2015) Assurance Taskforce, raising further concerns over his potential influence over ongoing attempts at reform.

## **3. Illegality**

GAH operated its PT Nabire Baru (PT NB) concession illegally for up to three years.

Development of the concession – including significant land clearing – began in 2011. Planting began in January 2012. However, PT NB did not receive its Plantation Business Permit (IUP) until 15 April 2014, so had no legal basis on which to operate a plantation. That IUP itself was issued illegitimately, as the company had not yet received its Environmental Permit (AMDAL), and did not receive it until 26 August 2014. The issuance of an IUP is dependent on a company having obtained an AMDAL.

In December 2016, GAH stated that "The government agencies of Nabire and Papua province are mutually in agreement that commencement of limited oil palm development prior to AMDAL approval was not in line with the legal requirements in Indonesia", and again in March 2017 "that the commencement of oil palm plantation development prior to AMDAL approval has compromised the legal procedure in Indonesia".

In effect GAH admits that its operations were not in compliance with national law. However, it added that "it was deemed as not violating the law as the government exercised its discretion and authority to issue all necessary permits". Yet this necessitates that the government issued the permits in violation of both the national plantation law, and the Environment Law, both of which govern how governors and district heads are to administer such permits. Neither law allows the interpretation to which GAH alludes, or that local officials appear to have taken.

None of these issues is addressed in the NPP for PT NB, but they would have been clear to both BSI and the RSPO Secretariat when they authorised the uploading of the NPP to the RSPO website.

The RSPO should be concerned that its members are laundering illegally developed land into the certification process. This brings the standard into disrepute.

## **4. Recommendations for the Board of Governors**

### ***Regarding PT Nabire Baru and Goodhope Asia Holdings Ltd.***

- RSPO BoG to instruct the Secretariat to publish information it holds pertinent to the incompleteness, poor quality and factual inaccuracy of the NPP of PT NB.

- RSPO BoG to instruct the Secretariat to issue a stop work order to PT NB until new assessments have been finalised and peer reviewed, and agreement has been reached on compensation / restoration of areas illegally developed or developed in gross violation of RSPO P&C.
- RSPO BoG to instruct ASI to investigate the NPP process at PT NB, including the conduct of PT NB and Goodhope, BSI, and the RSPO Secretariat.

#### ***Regarding Resolution 6h***

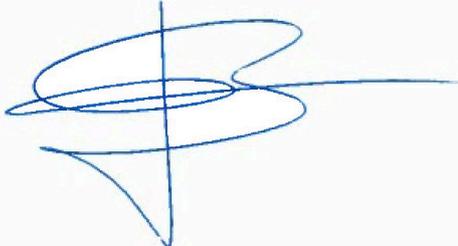
- RSPO BoG to urge Edi Suhardi to recuse himself from the Assurance Task Force Steering Committee.
- RSPO BoG to investigate the failings of the RSPO Secretariat in the implementation of Resolution 6h, urge the Secretariat to redouble its efforts in this reform process, and to prioritise it over and above the revision of wider RSPO core documents over the coming 1-2 years.
- RSPO BoG to issue an explicit instruction to the RSPO Secretariat to ensure that no core document revisions take place until Resolution 6h has been credibly implemented and that any revisions of core RSPO documents (P&C, NPP, etc) over the coming year or two are predicated entirely on the findings and measures to be implemented as part of Resolution 6h.

#### ***Regarding Accountability in the RSPO Secretariat***

- RSPO BoG to establish complaints procedure catering explicitly for failings of the RSPO Secretariat.
- RSPO BoG to investigate the failings by the Secretariat relating to the posting of the NPP of PT NB/Goodhope, and to discipline appropriately any person found to have acted wrongfully.
- RSPO BoG to investigate concerns about actual or potential undue influence on the RSPO Secretariat exercised by Goodhope's Edi Suhardi, and to act accordingly if undue influence was wielded by him in relation to Goodhope NPPs.

#### ***Statement of responsibility***

*I understand the NPP process and submit these comments in good faith (i.e. comments and justifications are true to the best of my knowledge). I will engage actively in the NPP process and will work to resolve these comments and concerns.*

A handwritten signature in blue ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

Audrey Versteegen  
Forest Campaigner  
Environmental Investigation Agency (EIA)