



Public summary: A review of Sudcam ESIA report

Corrie MacColl Limited (“Corrie MacColl” or “Company”) is the subsidiary of Halcyon Agri Corporation Limited responsible for the management and operation of their Cameroon Plantations since acquisition in late 2016.

As part of Corrie MacColl’s commitment to operate in line with best practice requirements, the Company requested Proforest to conduct a review of the Environmental and Social Impact Assessment (ESIA) on their Sudcam plantation, which original ESIA was conducted prior to the Company’s ownership and management of the plantation. With the aim of identifying gaps that need to be addressed in order to meet international best practice requirements, the review of the ESIA was therefore aimed at identifying whether the information provided in the ESIA report was adequate in making informed decisions on the project.

The review consisted of two parts – a judgement review of the ESIA against best practice requirements, and a review of the ESIA against international best practice principles of Environmental Impact Assessment (EIA) as defined by the International Association for Impact Assessment (IAIA).

The outcome of the desk-based judgement review found the ESIA to be largely adequate in three areas (description of the project, impact analysis and mitigation of negative impacts) but was found to be inadequate with the remaining three sections including the description of the study site; analysis of the alternatives of the project and stakeholder consultations. The result of the review of the ESIA against international best practice principles of EIA, as defined by IAIA, was that the ESIA was fully compliant with two of the principles (focused and integrated), while it is in partial compliance with three of the principles (purposive, adaptive and systematic). However, the ESIA did not comply with five of the principles (rigorous, participative, interdisciplinary, credible and transparency).

Evidence from review of documents, field verification and consultation with local stakeholders suggests that the new management has made significant progress on improving the social and environmental performance of the company’s operations including the development and implementation of a Sustainability Policy and a zero-deforestation commitment for Cameroon, as well as a more constructive and transparent engagement with stakeholders, particularly the local communities. This notwithstanding, several weaknesses have been identified as continuing and need to be addressed.

Significant among them are:

- **Description of the site and conservation importance of the landscape:** The ESIA is weak on description of the site and conservation resources of the landscape and how the proposed project could affect such resources. For example, the ESIA fails to adequately recognise the importance of the Dja Nature Reserve which is a UNESCO World Heritage Site and how the project’s proximity to such a site will affect sustainable management and conservation of the Heritage site.
- **Data collection and analysis:** The ESIA relied heavily on secondary data and information available in literature and failed to collect adequate primary data on both flora and fauna from terrestrial as well as water resources to inform the recommendations and project decision-making process.

The assessors should have conducted a comprehensive field data on both flora and fauna, as well as ecological, to augment the secondary data and to inform appropriately decision-making on the proposed project.

- **Stakeholder engagement and consultation process:** The stakeholder engagement process adopted by the assessors and the report presents unclear information on the stakeholder engagement and consultation process. It is unclear where and how stakeholders were engaged, and the report does not contain list of consultees.
- **Identification, description and analysis of potential negative impacts:** The identified potential impacts appear to be inadequate with inadequate description of the impacts. Analysis of impacts are weak with most of them far too brief and lacking objective analysis.
- **Analysis of the alternatives of the project:** There is weak analysis of alternative to the project. The ESIA thus, fails to inform decision making on the fundamental aspects of the project such as location and scale in a more credible manner. It also fails to discuss adequately, why the selected site was chosen and others rejected; and
- **Development of mitigation measures and an Environmental and Social Management Plan (ESMP):** Measures proposed addressing the identified negative impacts are unclear and the ESIA fails to include a detailed environmental and social management plan that the management of the company could adopt and implement.

Based on the findings above, several recommendations have been made. They include:

- a. **Develop and implement ESMP:** Develop and implement an action plan within the frame of an integrated ESMP to address all the environmental and social issues and non-compliances that may come out of the current review of the operations against the company's Sustainability Policy commitment. The integrated ESMP when completed should be made publicly available as part of the company's commitment to transparency.
- b. **Landscape approach to ESMP development and implementation:** The development of the ESMP should be based on a landscape approach including measures to effectively avoid or ameliorate effects of the project on the Dja Fauna Reserve
- c. **Participatory and inclusive process to ESMP development and implementation:** The development of the ESMP must be participatory, including elicitation of views of stakeholders, particularly the local communities and community-based social and environmental organisation's operating in the landscape.
- d. **Monitoring and evaluation of ESMP implementation:** The ESMP should include a monitoring protocol with clear and verifiable indicators for monitoring and evaluating progress while addressing the weaknesses and gaps identified and
- e. **Integration of HCV-HCSA and FPIC requirements into future ESIA:** In-line with Corrie MacColl's zero deforestation commitment for their Cameroon operations, there will be no future land conversion for rubber plantation within Sudcam's concession. It is still necessary for Proforest to advise on the need to precede any development with a comprehensive and participatory ESIA including High Conservation Value-High Carbon Stock Approach (HCV-HCSA) assessments and compliance with Free, Prior and Informed Consent (FPIC) requirements.

The recommendations provided by Proforest are not only consistent with the company's current management commitment but also fit well with the company's Sustainability Policy commitment. Therefore, the management of Sudcam has not only accepted our report but have also adopted the recommendations contained in the report and have commenced the implementation process.