

Guy Debonnet
Nature, Sustainable Tourism and Outreach
World Heritage Centre, UNESCO
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Paris 07 SP France

6 December 2019

Dear Mr. Debonnet,

UNESCO's report titled: Impacts des activités agro-industrielles de Sud Cameroun Hévée sur le site du patrimoine mondial de la Réserve de Faune du Dja, Cameroun

Thank you for your report. Corrie MacColl is the arm of the Halcyon Group responsible for the management of our plantations. Corrie MacColl's management has reviewed your report, its conclusions and recommendations. The following are responses to all relevant and specific points.

As a starting point, we would like to bring your attention to our [Sustainability Milestones](#) page. Starting in August 2018, this highlights the key milestones achieved including the publication of our [Sustainable Natural Rubber Supply Chain Policy](#) (SNRSCP), and our landmark decision to cease all further clearing and implementation of our [zero deforestation policy for Cameroon](#). In addition to the direct positive environmental impact, this decision will also minimise population growth in Sudcam, easing pressure on the Dja Reserve.

In April this year, the [Cameroon Sustainability Council](#) (Council) was established to bring together multi-stakeholder individuals uniting over a progressive agenda of ecological conservation and socio-economic development. Together, the independent Council monitors our Group's SNRSCP implementation and other external party recommendations, chaired by Mr. Abraham Baffoe, Africa Director of Proforest.

The Community Forests Platform (PFC), a Cameroonian national civil society representing over 50 local NGOs, has since agreed to [join the Council](#), significantly advancing our relationship with local communities and civil societies. More recently, we launched a [community engagement programme with APIFED](#) to shine a spotlight on the communities surrounding our Sudcam plantation.

Please find below, our responses to the recommendations relevant to Sudcam in your report.

"Base the new smallholder business approach on an in-depth feasibility study according to the availability of land to ensure the food security of local populations"

The [Cameroon Outgrower Programme](#) will benefit up to 13,000 smallholder farmers and will put into operation 27,000 hectares of currently fallow land. The programme, based on a multi-crop and livestock system, will provide food and income security from as early as 3 months from inception.

The [programme's onboarding process](#) was developed in consultation with Proforest and includes a detailed assessment to ensure that all candidates strictly comply with our SNRSCP commitments. The Council oversees and advises on all operations within our plantations, including the development and management of the Outgrower Programme.

“Remove and eradicate the invasive plants of *Mucuna bracteates* and *Pueraria Phaseoloides* that thrive in plantations”

“Seek an alternative to the use of these invasive plants”

Work has commenced to remove these invasive plants within the boundary zones, currently focused on swamp areas, which were planted between 2012-2013. We are performing this task by uprooting the plants rather than through use of chemicals, and expect this process to be completed by July 2020.

We continue to explore better alternatives for cover crops and will inform the Dja Reserve should we wish to run local tests.

“Contracting (EIA and others) with consulting firms independent of the government and private sector”

We realise that prior to our ownership, assessments conducted may not have met international standards. It has been a priority for Corrie MacColl to address these shortcomings by aligning ourselves with several teams across the civil society community. We now work closely with the World Wildlife Fund, Rainforest Alliance, Proforest and Mighty Earth, and will ensure that all future studies utilise globally recognised consulting bodies.

“Recruit the local and indigenous populations by providing training where needed”

We do not discriminate in our hiring process and continuously look for opportunities to ensure we hire from the local population. Our community engagement programme involving APIFED will provide further understanding of what the local community requires, and we will consider any recruitment recommendations.

“Refrain from future extensions of the latex processing plant in the SUDCAM central block and consider to establish extensions in other sites, better placed in terms of infrastructure and taking into account environmental and social aspects”

“Consider relocating the plant to a site better placed in terms of infrastructure and taking into account the environmental and social aspects”

“Make a plan for the relocation of the plant under construction to a site better placed in terms of infrastructure and taking into account the environmental and social aspects”

The relocation of the factory is not viable as construction is complete and most of the costs relate to civil works which cannot be moved. We have [implemented significant actions](#) to mitigate any potential impact on the Dja Reserve, including the installation of advanced effluent treatment systems which will target zero effluent discharge, building rain water collection systems from the roof and surrounding area to minimise water consumption from nearby rivers, and scrubber systems on the dryer exhaust.

We would like to invite members of your team to discuss the technical aspects of the factory in more detail and are happy to answer any specific questions you might have. We are open to receiving any definitive recommendations to further mitigate any concerns.

“Develop a detailed sustainable management plan for the entire SUDCAM, also covering the result of the above study and the rubber growing approach of the small planters”

“Revise the ESMP for plantations considering the social and environmental aspects (recruitment, invasive plants, use of herbicides)”

Proforest has recently concluded a [gap analysis](#) on the original Sudcam ESIA. As a recommendation, a thorough ESMP will now be developed. We are currently selecting a suitable partner to assist with the development of the plan, which will be verified by Proforest.

“Continue monitoring the activities and impacts of Sudcam involving the Cameroon Sustainability Council”

The Cameroon Sustainability Council established earlier this year, brings together international, multi-stakeholder individuals along the value chain, uniting over a progressive agenda of ecological conservation and socio-economic development. The independent team is committed to monitoring the implementation of Corrie MacColl’s Sustainable Natural Rubber Supply Chain Policy “SNRSCP” and other external party recommendations.

“Track the use of funds made available by Sudcam to the conservation department of the Dja WR allocated to surveillance.”

We receive monthly reports from the Dja WR providing a summary of activities and detailing costs incurred. We recommend that you contact the Dja representatives if you wish to receive the same reports on a monthly basis.

Yours sincerely,

Lee Chestnutt
Deputy Managing Director
Corrie MacColl Plantations