



**ENVIRONMENTAL AUDIT REPORT OF OKOMU OIL  
PALM COMPANY PLC, EXTENSION ONE ESTATE  
LOCATED AT OKOMU-UDO IN OVIA SOUTHWEST  
LOCAL GOVERNMENT AREA, EDO STATE, NIGERIA**



**SUBMITTED TO**

**FEDERAL MINISTRY OF ENVIRONMENT**

**August 2021**

**Environmental Audit Report of Okomu Oil Palm  
Company Plc, Extension One Estate at Okomu-Udo in  
Ovia Southwest Local Government Area,  
Edo State, Nigeria**

**Final Report**

**Submitted to:**

**Federal Ministry of Environment, Abuja**

**Prepared by**



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## **ACRONYMS AND ABBREVIATIONS**

AAWUN	Agricultural and Allied Workers Union of Nigeria
AGO	Automotive Gas Oil
AIDS	Acquired Immune Disease Syndrome
ATR	African Traditional Religion
BOD	Biochemical Oxygen Demand
CBD	Convention on Biological Diversity
m <sup>3</sup>	Cubic Meters
CO	Carbon monoxide
CO <sub>2</sub>	Carbon dioxide
COD	Chemical Oxygen Demand
°C	Degree Celsius
CFCs	Chlorofluorocarbons
CITES	Convention for prevention of International Trade in Endangered Species
CSR	Corporate Social Responsibility
DO	Dissolved Oxygen
DPR	Department of Petroleum Resources
ECM	Environmental Compliance Monitoring
EFB	Empty Fresh Bunches
EIA	Environmental Impact Assessment
EAP	Environment Action Plan
EAuR	Environmental Audit Report
EHS	Environmental Health and Safety
EMS	Environmental Management System
FFB	Fresh Fruit Bunches
FDS	Foremost Development Services Limited
FGD	Focus Group Discussion
FMENV	Federal Ministry of Environment
GHG	Green House Gas
Ha	Hectare
HAVS	Hand-Arms Vibration Syndrome
HSE	Health Safety and Environment
HCV	High Conservation Value
IEC	Information, Education and Communication
IFC	International Finance Corporation
IIBP	Industry International Best Practice
IPA	Impact Producing Activity
IPM	Integrated Pest Management
IPO	Initial Public Offer
ISO	International Organization for Standardization
kg	Kilogram
km	Kilometer
LCA	Life Cycle Analysis
LGA	Local Government Area
Ltrs	Liters
MoU	Memorandum of Understanding
MT	Metric Tonne
NDDC	Niger Delta Development Commission



Nm <sup>3</sup>	Normal Cubic Meters
NSE	Nigeria Stock Exchange
NESREA	National Environmental Standards and Regulations Enforcement Agency
NPK	Nitrogen, Phosphorus and Potassium
NO <sub>x</sub>	Oxides of Nitrogen
NPDC	Nigeria Petroleum Development Commission
OPC	Oil Palm Company
PHI	Public Health Impact
PLC	Public Limited Company
PMS	Premium Motor Spirit
PPE	Personal Protection Equipment
QHSE	Quality, Health, Safety and Environment
RSPO	Roundtable on Sustainable Palm Oil
RAMSAR	Convention on the Protection of Wetlands of International Importance
R & D	Research and Development
SDS	Safety Data Sheet
SIA	Social Impact Assessment
SON	Standards Organization of Nigeria
SPM	Suspended Particulate Matter
SO <sub>2</sub>	Sulphur dioxide
STD's	Sexually Transmitted Diseases
TOC	Total Organic Carbon
ToR	Terms of Reference
TSS	Total Suspended Solids
ULV	Ultra-Low Volume
UV	Ultraviolet
UNEP	United Nations Environment Programme
UNFCCC	United Nations Framework Convention on Climate Change
UNICEM	United Cement Manufacturing Company Limited
VOC	Volatile Organic Compounds
WHO	World Health Organization
Yr	Year

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## **Executive Summary**

### **ES 1.0 The Proponent**

The Okomu Oil Palm Company Plc (OOPC Plc) is an agricultural and food-processing company located at Okomu-Udo, Ovia Southwest Local Government Area, Edo State, Nigeria. The company specializes in plantation development and production of special palm oil, palm kernel oil, palm kernel cake and crumb rubber. It started operation in 1976 as a Federal Government project and was privatized in 1990. Edo State Government State government granted the company a total concession of about 6,000 hectares within the Okomu forest reserve known as Extension One.

### **ES 2.0 Location and Access**

The company is located at Okomu-Udo, within the Okomu Forest Reserve in Ovia Southwest Local Government Area of Edo State, Nigeria. The company is accessible through a network of roads from Lagos and Benin City. It lies between latitude 5°07' and 5°25' E and longitude 6°18' and 6°26' N.

Within the estate, there is over 600km earth road network, ensuring that all the features and plantation field are easily accessible.

### **ES 3.0 Project Description**

The environmental audit of Okomu OPC Plc – Extension One estate was carried out to assess the environmental performance of the Company from the point of view of conformance to local, national, and international environmental legislation, regulatory standards, and industry best practices. The audit covered all the facilities, processes, and operations of the company.

About 3,791.88 hectares has been developed into oil palm and rubber plantations at the Extension One estate. The lifespan of the project is about 200 years.

### **ES 4.0 Audit Findings**

In addition to land use, extensive reserves of natural vegetation were established as riparian buffer zones along the streams that drain the plantation and occupy 414.82 ha, or 6.79% of the concession area for the estate. The buffer zone has been well maintained, and they provide important habitat for flora and fauna.

Soil conservation practices are well understood and implemented across the plantations. The roads appeared well constructed and maintained with appropriate drainage measures and sediment traps in place.

There is also a well-developed program for integrated pest management (IPM), but more tall trees should be retained at new development sites for attracting birds of

prey. However, the approach to pesticides use is well controlled and consistent across the plantation estate.

The company maintains a list of statutory permits and certificates relevant to different operations and equipment in use. A good number of these permits and certificates have been obtained or revalidated. The level of performance of the company has been improved in this regard.

#### **4.1 Environmental Issues:**

The quality of the environment is high with good housekeeping at the offices and residences. However, the housekeeping and sanitation at some workplaces particularly residential quarters would need considerable improvement. The basic information for the protection of the environment, and the basic education and consciousness for safety at workplaces have been established with high sense of safety responsibility as demonstrated by workers across board.

The operations in the plantation and other workplaces are fraught with hazards and pollution potentials. However, the company has put in place a number of abatement measures including the provision of PPE to protect workers against workplace hazards and pollution prevention. In similar vein, a number of provisions have been made for waste reuse, waste reduction and waste recycling. These provisions include the use of EFB as mulch inside the plantation.

The facilities for storage of potentially hazardous substances at some chemical stores were built without the benefit of design information on environmental protection measures, such as spill containment. However, routine environmental monitoring is undertaken to ensure that surface water and groundwater are of acceptable quality.

#### **4.2 Waste Management:**

The waste management system is fairly good. For solid waste, reasonable provisions have been made for collection, transportation, and disposal. An internal solid waste dumpsite has been established thus enabling the tracking of waste. In addition, the company has a valid permit from Edo State Ministry of Environment and Sustainability to operate the solid waste dumpsite/landfill at Main estate where all wastes from Extension One estate are taken for disposal.

#### **4.3 Safety Issue:**

Signage display level, relating to safety education and safety warnings at workplaces has improved. Although, there is need for the procurement and display of more posters and safety related messages at workplaces.

#### **4.4 Medical Statistic:**

The clinic is functional. Malaria, Rheumatic and Joint Pain, Respiration Tract, and minor ailments such as bruises, cut, pains, etc., are the most prevalent illnesses. The preventive health education programme of the clinic needs some improvement with special emphasis on prevention of malaria.

### **ES 5.0 Laboratory Results**

The results of laboratory analysis obtained during this audit show that both groundwater and surface water quality are good and free from pollution except for low pH with 4.94 and 5.89-5.61 for borehole and surface water respectively, thus making the water to be acidic, which is below the FMEnv and WHO (2004) drinking water guideline of pH 6.5-8.5.

Audit findings show there is no air pollution at the facility and environs. The measurements carried out at the facilities show that the concentrations of gases and particulate matter monitored were within the FMEnv. Limit.

The result has shown that some parameters such as Suspended Particulate Matter (SPM) ranges between 31-190 $\mu\text{g}/\text{m}^3$ ; Carbon dioxide, <0.27-0.38%; Hydrocarbon, <0.1%; and Nitrogen oxides, <0.01ppm which are within FMEnv permissible limits of 250  $\mu\text{g}/\text{m}^3$ , ambient, nil and 0.04-0.06ppm, respectively.

Audit findings also show that there is no noise pollution on the estate including critical work areas. The measurements taken at different workplaces show that noise levels range from 33.6dB(A) – 68.3 dB(A) across the estate.

### **ES 6.0 Conclusion and Recommendation**

The audit has revealed the high level of consciousness and awareness of the environment by the workers and has identified the need for continuously undertaking training and education of workers widely on related environmental, safety and health issues.

For all the observed limitations, non-conformances and poor performances, appropriate recommendations have been made for improvement. In order to bring to effect the recommendations arising from this audit therefore, a robust Environmental Action Plans (EAPs) has also been developed for the estate. It is recommended that the EAPs be diligently implemented.

## **CHAPTER ONE**

### **1.0 Introduction**

The Okomu Oil Palm Company Plc (OOPC Plc) is a leading agricultural establishment in Nigeria. The company specializes in the establishment and maintenance of oil palm and rubber plantations and has been in operation for over 30years. The company has incorporated remarkably high environmental standards in its operations and is committed to continual improvement in its environmental management system.

The company commissioned Foremost Development Services Limited (independent environmental consultants) to carry out an Environmental Audit of its processes and operations covering its plantations and supplementary facilities. The objective is to determine and thereby provide regulatory bodies (such as Edo Ministry of Environment and Public Utilities) with a clear indication of the overall environmental performance of the company for the period covered by this audit.

The audit involved fieldwork including physical inspection of workplaces, residences, meetings, and interviews, of HSE committee and designated employees. It also involved examination and review of records and reports relating to environmental management. In addition, some physical environmental factors were sampled, and the samples collected were later analyzed in the laboratory.

The audit involves the examination of operations, records, and data between **2018, 2019 and 2020** vis-à-vis conformance to state, national and international legislations, fieldwork inspections and interview of employees. In addition, some physical environmental factors were sampled, and the samples collected were later analyzed in the laboratory.

An overall assessment of the operations is then summarized in Chapter Seven (Summary of Audit Findings and Recommendations) and a robust prioritized Environmental Action Plans in Chapter Eight for the changes that have been recommended for improving the environmental, health and safety performance.

This report is structured to present the description of the facilities and processes, provide information on environmental planning approvals, followed by analysis and facility audit in the sequence of topics listed in the IFC's Environmental, Health, and Safety Guidelines for "Perennial Plantation Crop Production" (IFC, March 30, 2016).

## **1.1 Mission Statement of Okomu Oil Palm Company Plc**

### **Our Mission is:**

To be Nigeria's leading agro business, through the efficient and effective management of our various plantations by a highly motivated workforce, working in harmony with our stakeholders, and continuously returning favourable results to our shareholders.

### **Our Core Values**

- Honesty
- Service
- Adherence to rules
- Recognition (Respect and Reward)

## **1.2 Regulatory Bodies**

### **1.2.1 Local Government Area**

The Ovia Southwest Local Government Area Council is the tier of government that is responsible for regulating and monitoring the environment at the local level especially the aspects of health and sanitation inspection of business premises to ensure that they conform to set standards.

### **1.2.2 State Ministry of Environment**

The Ministry of Environment, Edo State is the arm of government responsible for regulating the environment in Edo State of Nigeria. Depending on certain peculiarities of the State, the Ministry has made and established its own laws and environmental standards, which are not inconsistent with Federal laws.

### **1.2.3 Federal Ministry of Environment**

The Federal Ministry of Environment is the apex body with the broad mandate to regulate and protect the environment in Nigeria. The Ministry has enacted a number of environmental laws and regulations. In addition, Nigeria is party to some international agreements; protocols and conventions on Environment and is bound by their provisions and requirements. Some of the relevant laws and regulations are presented below.

## **1.3 Review of Relevant Environmental Legislation**

Some of the national legislations relevant to the project operations are listed below:

- Environmental Impact Assessment (EIA) Act, Cap E12 LFN 2004
- National Guidelines and Standards for Environmental Pollution Control in Nigeria, 1991
- Harmful waste (criminal provision) Act 42 of 1988
- National Guidelines for Environmental Audit in Nigeria, 1999



- National Guidelines on Environmental Management System in Nigeria, 1999.
- National Environmental Standards and Regulations Enforcement Agency, (NESREA), 2007.
- S.I.8: National Environmental Protection (Effluent Limitation) Law of August 1991.
- S.I.9: National Environmental Protection (Pollution Abatement in Industries and Facilities Generating Wastes), 1991.
- S.I.15: Waste Management and Hazardous Wastes Regulations, 1991.
- S.I.28: National Environmental (Sanitation and Waste Control) Regulations, 2009
- S.I.3: National Environmental (Noise Standards and Control) Regulations, 2009
- Factories Act CAP F1 LFN 2004
- Land Use Act, CAP L5 LFN 2004

#### ***National Policy on Environment***

The National Policy on Environment 1989 provides for “a viable national mechanism for cooperation, co-ordination and regular consultation, as well as harmonious management of the policy formulation and implementation process which requires the establishment of effective institutions and linkages within and among the various tiers of government, federal, state and local governments”. Prior to the launching of this policy, there was no unified co-ordination of activities of the 3-tiers of government responsible for the environment.

#### ***Environmental Impact Assessment (EIA Act CAP E12 LFN 2004)***

EIA act was promulgated in 1992. It makes environmental impact assessment (EIA) mandatory for all new major projects. Therefore, an EIA is requested by the Federal Ministry of Environment for the proposed project.

#### ***National Guidelines and Standards for Environmental Pollution Control in Nigeria 1991***

This schedule deals with the control of industrial effluent discharge, gaseous emissions, and hazardous wastes, so also noise pollution control. This schedule established environmental guidelines and standards for the abatement and control of all forms of pollution.

The proposed and/or project would therefore have to ensure that any discharges into the land, water and atmosphere are of acceptable quality to ensure that there are no legal repercussions under this schedule.

***National Effluent Limitations Regulations S.I.8, 1991***

These Regulations give the parameters in industrial gaseous emissions and wastewater (effluents) and their limitations, concentration, and standards for discharge into land, atmosphere and receiving surface waters.

The proposed project would therefore have to ensure that any discharges into the land, water and atmosphere are of acceptable quality to ensure that there are no legal repercussions under this schedule.

***National Pollution Abatement in Industries and Facilities Generating Wastes Regulations S.I.9, 1991***

This regulation requires every industry to install anti-pollution/pollution abatement equipment to treat effluent discharges and gaseous emissions to the standards and limits prescribed in Regulation S.I.8, 1991.

***Waste Management and Hazardous Wastes Regulations S.I.15***

This regulation requires that all steps that are necessary must be taken for the effective management of solid and hazardous wastes in order to safeguard public health, also ensure that waste is collected, stored, transported, recycled, reused or disposed in an environmentally sound manner and promote safety standards in relation to such waste.

***National Environmental (Sanitation and Waste Control) Regulations, 2009 (S.I.28)***

The purpose of these regulations is the adoption of sustainable and environment friendly practices in environmental sanitation and waste management to minimize pollution. The provisions of the regulations state that a person in care, management or control of any industrial facility shall:

- (a) Provide educational and pictorial signs to direct persons where they can drop waste.
- (b) Provide receptacles for recyclable materials in appropriate and easily accessible locations.
- (c) Keep the premises, drains and all public or private lands, street, lanes, walkways; beaches or docks within 5 meters of the boundary of the property free from litter always.
- (d) Ensure that discarded materials are regularly collected and disposed of sanitarily.
- (e) Ensure that recyclable materials are properly packed and neatly stacked.
- (f) Ensure sorting and segregation of solid waste at source.

***National Environmental (Noise Standards and Control) Regulations, 2009 (S.I.35)***

The purpose of these regulations is to ensure maintenance of a healthy environment for all people in Nigeria, the tranquility of their surroundings and their psychological well-being by regulating noise levels and generally, to elevate the standard of living of the people. The regulations among others state the permissible noise levels to which a person may be exposed; control and mitigation of noise; permits for noise emissions in excess of permissible levels; and enforcement.

***Land Use Act, Cap L5 LFN 2004***

The Nigerian Land Use Act 1978 was promulgated in March 1978. It vests all land in each state of the federation (except land already vested in the Federal Government or its agencies) in the Governor of the state. It makes the state Government the authority for allocating land in all urban areas for residential, agricultural commercial and other purposes while it confers similar powers regarding non-urban areas on the Local Government in such area. The Governor of a state can revoke a Right of occupancy (statutory customary) for overriding public interest.

***Factories Act CAP F1 LFN 2004***

The regulations for Health, Safety and Welfare are under this act. This act also requires that: Before any person occupies or uses as a factory any premises which were not so occupied at the commencement of this Decree, he shall apply for the registration of such premises by sending to the Director of Factory an application containing the particulars set out in Schedule 1 to this Decree.

Any person who has not been issued a certificate of registration as aforesaid occupies or uses as a factory any premises that have not been registered as a factory shall be guilty of an offence.

#### **1.4 International Agreements and Protocols**

Nigeria's commitments to global environmental agreements includes:

***The Montreal Protocol, 1985:*** on substances that deplete the ozone layer and the promotion of the synthesis of new and environment-friendly products.

***The Basel Convention, 1989:*** for the control of Trans-boundary Movement of Hazardous Wastes and Substances and their disposal.

***The United Nations Framework Convention on Climate Change (UNFCCC), 1992:*** to stabilize atmospheric concentrations of greenhouse gases at levels that will prevent human activities from interfering dangerously with the global climate system.

***The Convention for the Prevention of International Trade in Endangered Species, (CITES), 1973:*** regulates trading with/trade restrictions involving certain wild animals and plants whose numbers are considered to be endangered.

***Convention on Biological Diversity (CBD), 1992:*** on the conservation of biodiversity; the sustainable use of its components; and the fair and equitable sharing of the resulting benefits.

***International Financial Corporation (IFC) Performance Standards:*** international guidelines of IFC Performance Standards which include:

- **Performance Standard 1:** Assessment and Management of Environmental and Social Risks and Impacts
- **Performance Standard 2:** Labour and Working Conditions
- **Performance Standard 3:** Resource Efficiency and Pollution Prevention
- **Performance Standard 4:** Community Health, Safety and Security
- **Performance Standard 5:** Land Acquisition and Involuntary Resettlement
- **Performance Standard 6:** Biodiversity Conservation and Sustainable Management of Living Natural Resources
- **Performance Standard 7:** Indigenous People
- **Performance Standard 8:** Cultural Heritage

IFC- Environmental Health and Safety (EHS) Guidelines for Perennial Crop Production.

## **1.5 Company Information**

### **1.5.1 Company History**

The Okomu Oil Palm Company Plc (OOPC Plc) is an agricultural and food-processing company located at Okomu-Udo, Ovia Southwest Local Government Area, Edo State, Nigeria. The company specializes in plantation development and production of special palm oil, palm kernel oil and palm kernel cake. It started operation in 1976 as a Federal Government project and was privatized in 1990. The then Bendel State government granted the company a total concession of about 15,000 hectares within the Okomu forest reserve in 1978. About 15,580 hectares of the total concession at the main estate has been developed into oil palm and rubber plantations.

In addition to this, the company acquired the right and concession of about 6,116 hectares of land east of the Okomu National Park, inside the Okomu Forest Reserve. This piece of land is called Extension One. The land had been developed into oil palm and rubber plantation. Presently, about 415.41 hectares of Extension One has been developed into oil palm and rubber.

Okomu Oil Palm Company Plc has over 12,000 individual and institutional shareholders, both Nigerian (40%) and foreign (60%). The company employs about 534 permanent workers including expatriates and Nigerians at management, intermediate, and junior cadres and about 469 fix rate and 3577 daily rated workers.

### **1.5.2 Location and Access**

The company is located at Okomu-Udo, within the Okomu Forest Reserve in Ovia Southwest Local Government Area of Edo State, Nigeria. The company is accessible through a network of roads from Lagos and Benin City. It lies between latitude 5°07' and 5°25' N and longitude 6°18' and 6°26' E.

Within the estate, there is over 600,04 km earth road network at Main and Extension One estates, ensuring that all the features and plantation field are easily accessible.

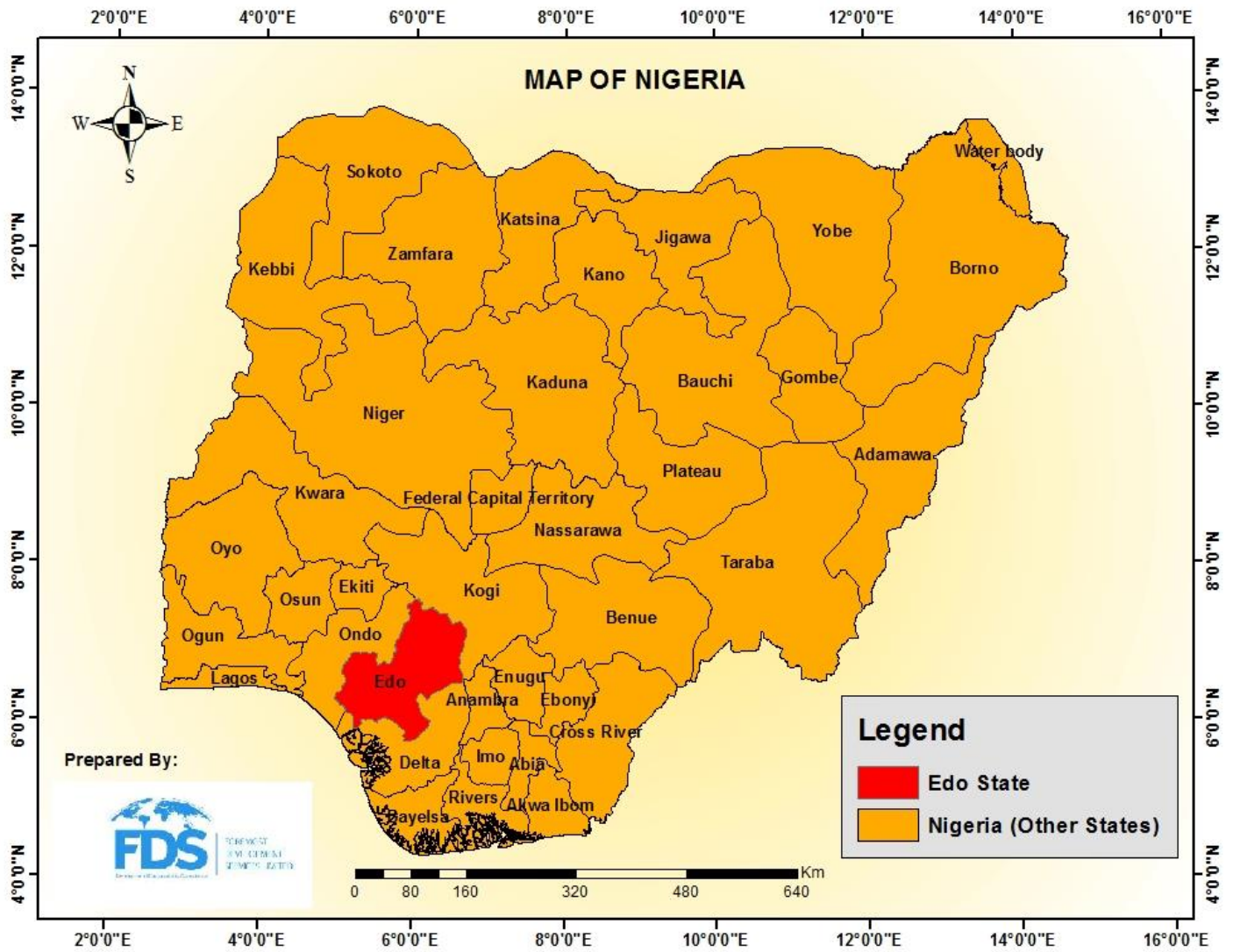
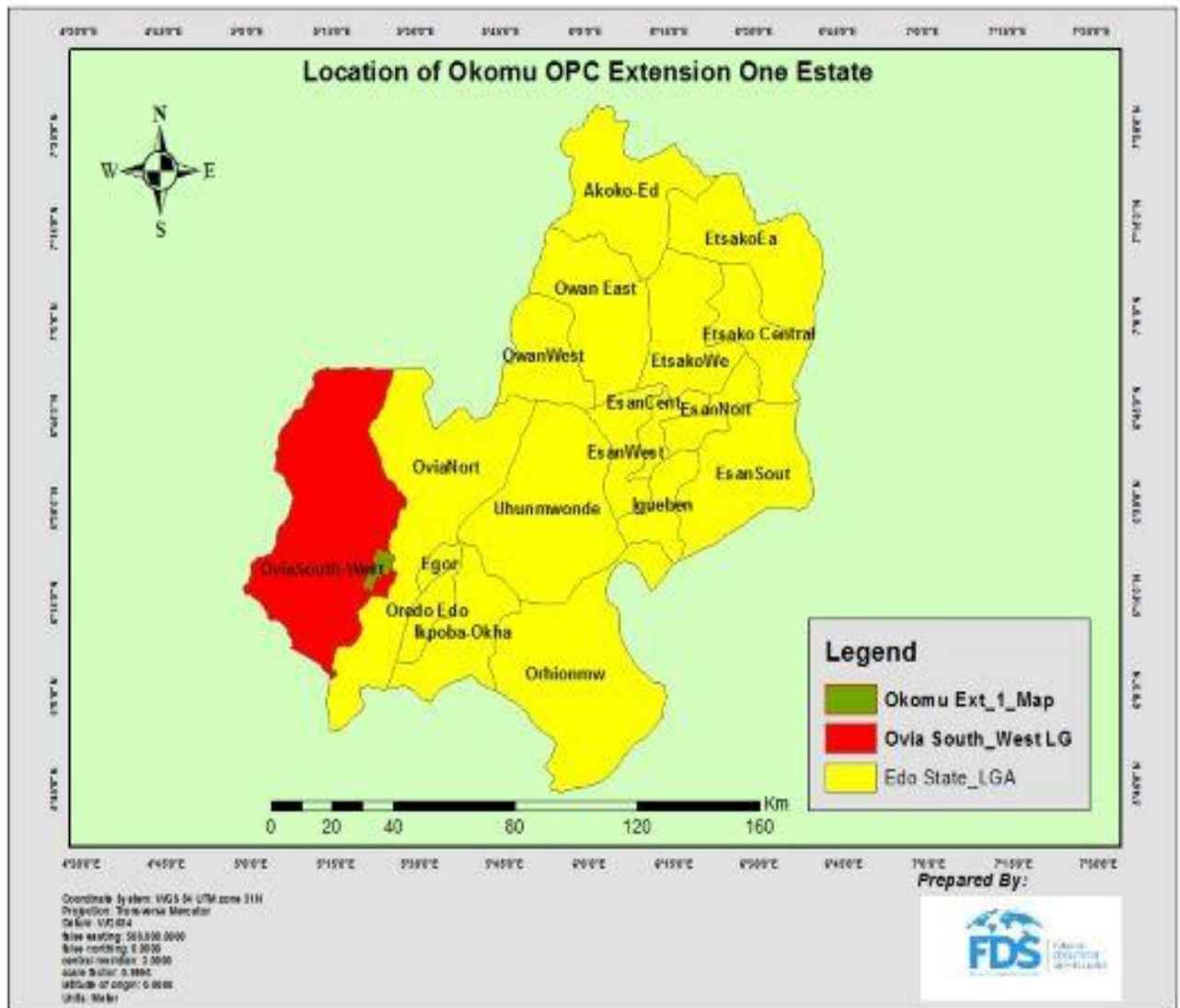
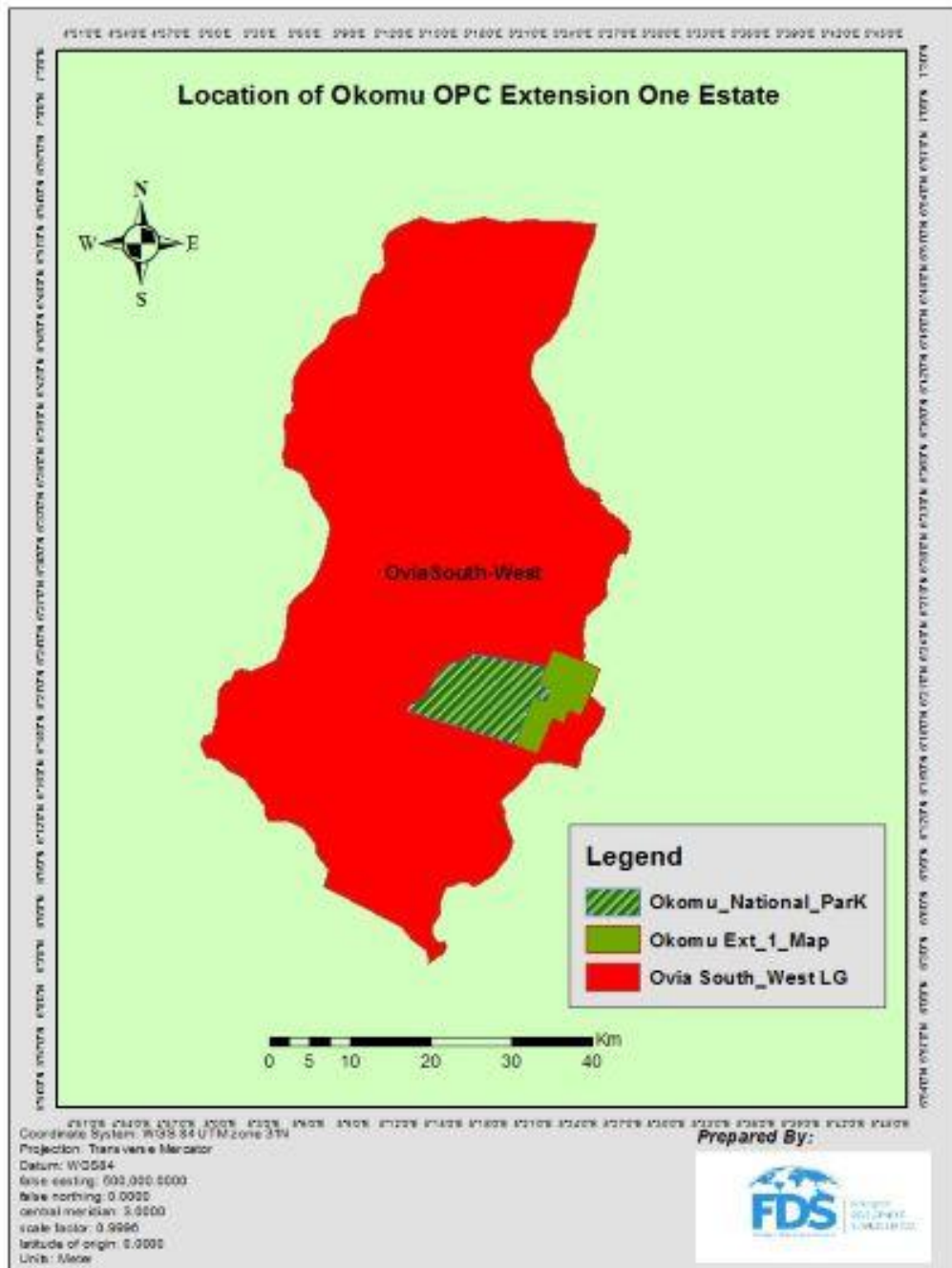


Figure 1: Map of Nigeria Indicating Edo State

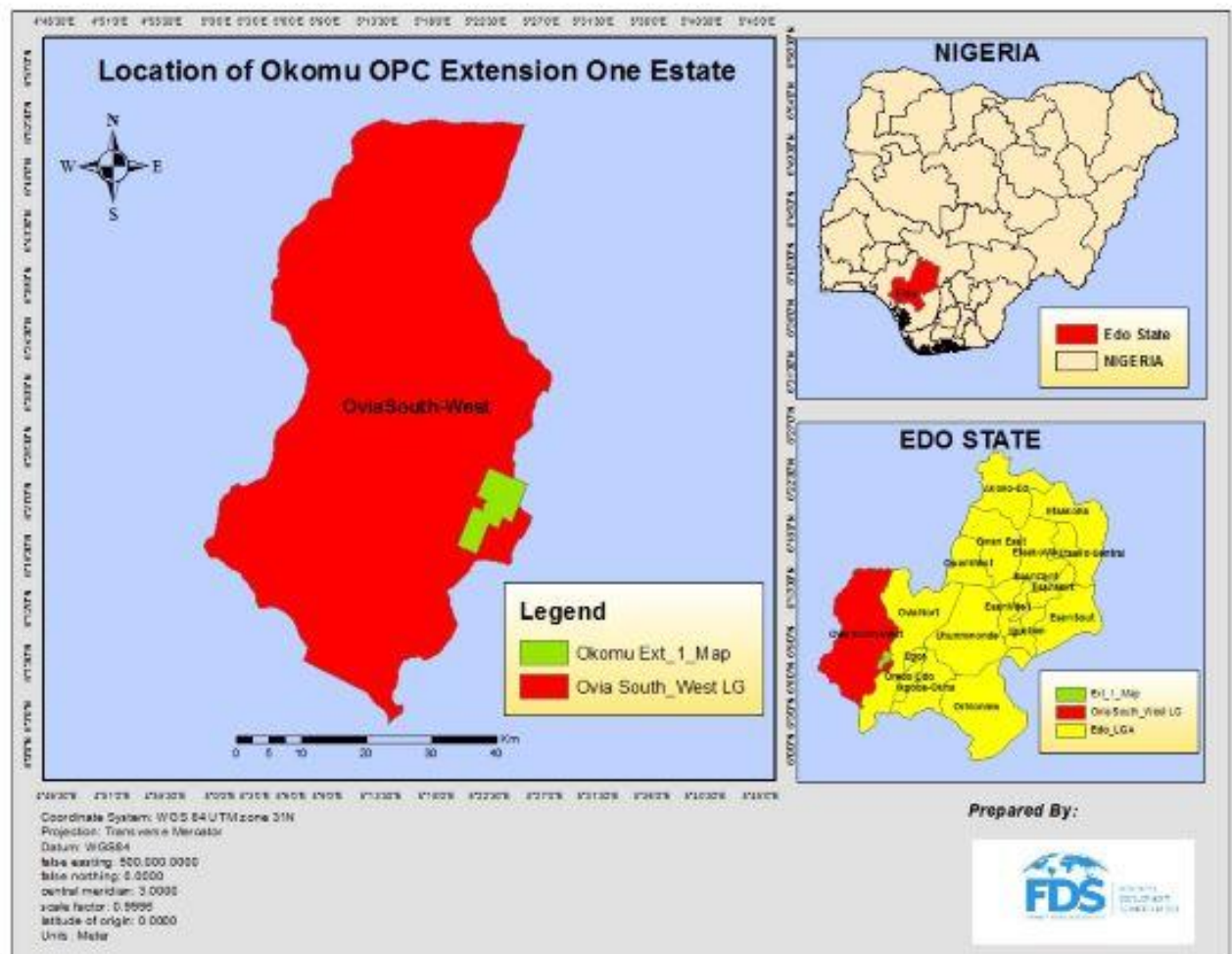


**Figure 2: Location of Okomu-OPC Extension One Plantation in Relation to Ovia Southwest LGA and Edo State of Nigeria**

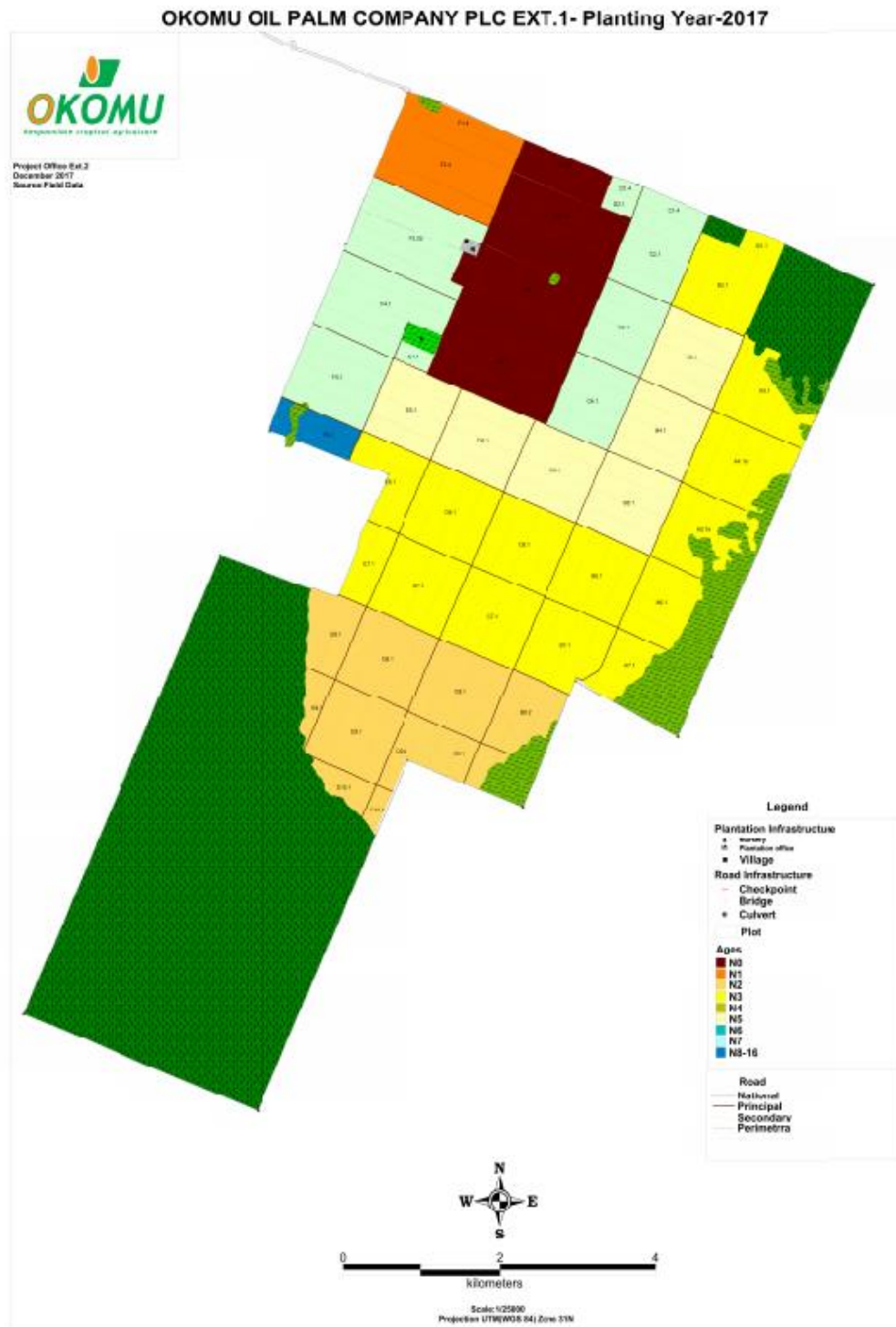




**Figure 3: Location of Okomu OPC Extension One Plantation in Relation to Ovia Southwest LGA and Okomu National Park**



**Figure 4: Location of Okomu OPC Extension One in Relation to Ovia Southwest Local Government Area, Edo State and Nigeria**



**Figure 5: Extension One Estate Plantation Map**

Source: Okomu OPC Plc HSE Department (December 2020)

### **1.5.3 Activities**

The estate undertakes plantation agriculture involving the growing and harvesting of oil palm (*Elaeis guineensis*). The company is also involved in the planting and tapping of rubber trees (*Hevea brasiliensis*). The major operations of Extension One estate includes the oil palm and rubber plantation development and management.

### **1.6 Objective of the Audit**

The objective of this audit is to evaluate and determine the environmental performance of the Company's estates from the point of view of conformance to local, national, and international laws and standards, and industry best and management practices.

### **1.7 Period of Audit**

The audit was undertaken from 21 – 23 December 2020.

### **1.8 Terms of Reference (ToR)/Scope of Audit**

The detailed Terms of Reference are provided in Annexure I.

## CHAPTER TWO

### Description of Facilities and Processes

#### 2.1 Infrastructure & Services

The infrastructure and services provided on the estate include road network, electricity supply, water supply, communications, fuel supply, storage services and health care delivery.

##### 2.1.1 Electricity

At the estate, adequate electricity is supplied from the powerhouse. The powerhouse is equipped with two (2 Nos.) heavy-duty industrial diesel engine generators of different ratings while another diesel engine generator is attached to the palm nursery. The electricity generated from the powerhouse is supplied to the offices and residences.

**Table 2.1: Make, Model and Capacity of Electricity Generating Systems**

S/NO	MAKE & MODEL & CAPACITY	FLEET NO.	LOCATION
1	PERKINS GEN SET - 500KVA	GS-5793B	Powerhouse
2	PERKINS GEN SET - 250 KVA	GS-5809	Powerhouse

Source: HSE Office, OOPC Plc (December 2020)

##### 2.1.2 Water Supply

Water supply in the estate is from boreholes. There are three boreholes as presented in Table 2.1 below.

**Table 2.2: Major Sources of Water on the Estate**

Borehole Location	No.	Remarks
Quarters	1	Functional
Palm Nursery	2	Nonfunctional at the time of audit

Both irrigation and potable water are sourced from groundwater. Water is distributed through a network of pipes connected to storage tanks that are located at strategic places.

##### 2.1.3 Communication

Internal communication at the estate is effected through Radio communication (Walkie-Talkie) with the main estate, while external communication is made possible using the Global System for Mobile communication (GSM).

### 2.1.4 Fuel Supply

The major source of energy is fossil fuel. A fuel dump comprising mainly surface storage tank services the powerhouse. The fuel storage provision at the estate is about 34,000liters mainly for AGO.

### 2.1.5 Fire Services

A designated fire station has been established to provide fire prevention and control services on the estate. So also, are fire extinguishers positioned at strategic locations on the estate.



Plate 2.1: Stand-by Fire Fighting Truck



Plate 2.2: Stand-by Fire Fighting Water Reservoir

### 2.1.6 Roads

There is a network of earth roads connecting all workplaces and facilities.

### 2.1.7 Weather Station

There is a weather station by the nursery, equipped with rain gauge, thermometers and piche-evaporimeter to collect data on rainfall, temperatures, and evaporation respectively.

### 2.1.8 Stores

There are two (2 Nos.) stores on the estate for the storage of plantation tools, materials, agrochemicals, and fertilizer as presented in Table 2.3 below.

Table 2.3: Location of Stores on the Estate

S/No.	Name	Contents	Location
1.	General Store	Plantation tools and materials	Administration block
2.	Fertilizer store	Fertilizers and Agrochemicals	Adjacent the administration block (Newly built, well secured)





**Plate 2.3: Fertilizer and Agrochemical Store Adjacent Administration Office**

### **2.1.9 Clinic**

A clinic is located within the administration office to provide medical services to workers and their families. The clinic handles observation/monitoring and minor health cases. The medical staff includes two (2Nos.) Nursing Officers and one (1No.) Ward Aid. The clinic is an extension of the main estate's clinic. It has one standard ambulance on stand-by for emergencies.



**Plate 2.4: Stand-by Ambulance**



**2.1.10 Office Accommodation**

A bungalow provides office accommodation for plantation administration and security staff.

**2.1.11 Residences**

Accommodation is provided for workers and their families on the estate. Two types of residential accommodation are available for junior and senior staff.

**2.1.12 Recreation**

A football field is provided for recreation. A new staff club has been built and it has since become operational.

**2.7.13 Transportation**

Two categories of vehicles are provided for transportation namely light vehicles fleet and heavy-duty fleet. The light vehicles fleet comprises 4-Wheel Drive jeeps and mini-buses while the heavy-duty fleet consists of mainly tippers. The agric department takes charge of them.

**2.1.14 Provisions Stores**

Provision stores operated by residents are scattered within the residences. Provision items sold in the stores range from confectionaries, beverages, canned foods and drinks (alcoholic and non-alcoholic). The provision items are displayed as merchandize on the corridors.

**2.1.15 Truck Park:** Truck Park for trucks transporting FFB and cup lump to the Main estate for processing.

## 2.2 Organizational Structure

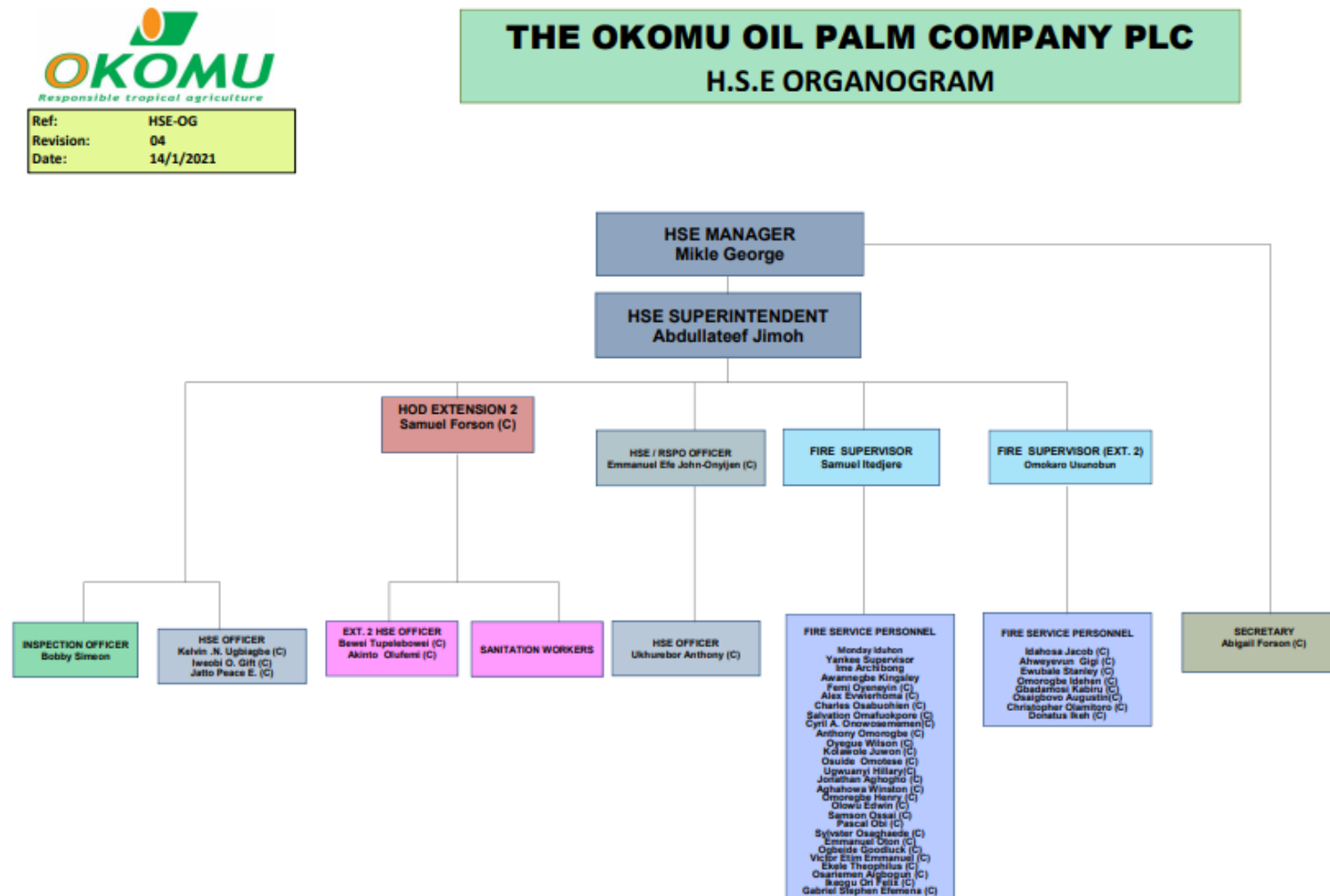


Figure 6: Okomu-OPC HSE Organogram

## **2.3 Palm Nursery**

The palm nursery is about 11.74 ha. It is for the raising and nurturing of young seedlings of oil palm prior to establishment in the field. The nursery is equipped with sprinkler irrigation facilities and three (3 Nos.) balloon-like (made with polyphenyl material) water storage facilities. Oil palm seedlings are raised in poly bags, until they are 11-15 months old when they are ready for transplanting in the field.

## **2.4 Plantation**

The plantation consists of both oil palm and rubber trees of different ages as follows.

### ***2.4.1 Oil Palm Plantation***

The total oil palm planting is 1,980.24 ha. Plantation development started in 2003 with an initial planting of 276.10ha and planting has progressed till 2017, thus giving the plantation age profile of 3-17 years.

### ***2.4.2 Rubber Plantation***

The total rubber planting is 1,811.6 ha. Plantation development started in 1988 with an initial planting of 250.0ha and planting progressed till 2013, thus giving the plantation age profile of 7-32 years.

## **2.5 Total Plantation Area**

The total plantation area for both oil palm and rubber is 3,791.84 ha, comprising 1,980.24 ha oil palm plantation and 1,811.6 ha rubber plantation.

## **2.6 Oil Palm Field Layout**

The plantation is laid out in fields of 25 hectares each. The planting rows are aligned North-South to allow for optimum light interception. The NIFOR “Tenera” type of oil palm was solely planted initially, while the IRHO Tenera and other types dominated the latter plantings.

### ***2.6.1 Oil Palm Plantation Up-keep***

Oil palm up-keep operations include pruning, weeding, slashing and fertilizer application. Pruning is done manually, and the pruned fronds are laid down within the rows to conserve the soil. Avenue slashing is also done manually while ring weeding is done for individual palms either manually or by the application of herbicides.

Different formulations of fertilizer are used including NPK 15:15:15, 20:10:10, 12:12:17 + 2MgO (used in the nursery and for mature palms), Muriate of Potash (for mature palm), Borax (when there is Boron deficiency) and

Kieserite (when there is Magnesium deficiency). Usually, fertilizer application is well guided and based on results of leaf analysis.

In addition, leguminous cover crop, Pueraria is planted to provide ground cover and supply Nitrogen to the soil. Insect pest control is by Integrated Pest Management techniques combining cultural, biological, mechanical, and physical methods. Although, no fungicides are used in the plantation, limited amounts are used in the nursery on prophylactic basis.

### ***2.6.2 Harvesting***

Malaysian knife mounted on a long pole is used to harvest Fresh Fruit Bunches (FFB).

## **2.7 Rubber Field layout**

The plantation is laid out in double and single line spacing. The planting rows are aligned North-South to allow for optimum light interception. The IRCA230 and PB314 rubber clones were solely planted initially, while the GT1 PB312, PB217, RRIC100 and RRIM703 dominated the latter plantings.

### ***2.7.1 Plantation Up-keep***

Rubber up-keep operations include pruning, line weeding, inter-row weeding and fertilizer application. Pruning is done manually to keep the shoot up to 2 meters high. This is done to achieve a flat panel of rubber trunk. Line weeding is done by the application of herbicides.

Different formulations of fertilizer are used including rock phosphate and urea (used in the nursery and for immature rubber). Herbicides, including glyphosate for immature rubber lines and carbondazim for tree poisoning between the rows. Also, diuron is applied in the pegged rubber lines before transplanting in the field. Usually, fertilizer and herbicides application are well guided.

In addition, leguminous cover crop, Pueraria is planted to provide ground cover and supply Nitrogen to the soil. Insect pest control is by Integrated Pest Management techniques combining cultural, biological, mechanical, and physical methods. Although, fungicides are used but mainly in the nursery at limited amounts, these include fulpan, macozeb and foldazin (folpet, macozeb and foldazin as active ingredients).

### ***2.7.2 Tapping***

Tapping knife is used in tapping the mature rubber trees. The coagulated latex (cup lumps) is collected and transported to the cup lump shed inside the factory in trucks.

## 2.8 Land Use/Layout

The company operates two different plantations at extension one estate (Oil Palm and Rubber). The oil palm occupies total area of about 1,980.24 ha, while rubber occupies 1,811.6 ha (see Extension One estate plantation map in Figure 5 above).

Furthermore, the land use within Okomu OPC extension one concession area is detailed in Table 2.4 below.

**Table 2.4: Current Land Use**

LANDUSE	LOCATION (Ha)
	Extension One Estate
<b><u>Oil Palm:</u></b>	
Mature Area	1968.5
Immature Area	Nil
Nurseries	11.74
<b><u>Total Planted Area:</u></b>	<b>1980.24</b>
<b><u>Rubber:</u></b>	
Mature Area	1277.4
Immature Area	534.2
Nurseries	
Budwood garden	
<b><u>Total Planted Area:</u></b>	<b>1811.6</b>
<b><u>Others:</u></b>	
Housing/Office Area	9.11
Reserved Areas	415.41
Roads	173.47
Undeveloped Land	1726.7
<b>Total Estate Land Area (Approx.)</b>	<b>6116.53</b>

Source: HSE Office, OOPC Plc (December 2020)

The estate is divided into work areas for good management. Within the estate is provided residential quarters for the senior staff, junior staff, and contractors. The facilities and infrastructure in the estate include a dispensary, staff club house, guesthouse, road network, and powerhouse with generators for electricity supply. There are also boreholes with overhead tanks and ancillary facilities for pipe-borne water supply.

## CHAPTER THREE

### Site/Facility Inspection Audit

#### 3.0 Baseline and Existing Environmental Assessment Study

The audit of the facility and the existing Environmental, Occupational Health, and Safety Management System was carried out using the combination of the IFC's Environmental, Health, and Safety Guidelines for "Perennial Plantation Crop Production" (IFC, March 30, 2016), the National Guidelines for Environmental Audit Report (EAR) in Nigeria, Nigeria Factories Act, CAP F1 LFN 2004 and Industry/Management Best Practices.

#### 3.1 Sampling Points

Sampling was done within the extension one estate concession. At each sampling location, the GPS was taken including groundwater quality, surface water quality, air quality and noise level measurements.

The sampling locations were within the spatial boundaries of the estate. The sampling points with their coordinates are presented in Table 3.1 and Figure 7 below:

**Table 3.1: Co-ordinate Points of Sampling Locations**

Sample Points	Location	Coordinates		Environmental Component Monitored
Borehole Water				
Point 1	Extension One Quarters (OKM <sub>EXTQ</sub> )	N06 <sup>0</sup> 22' 22.2"	E005 <sup>0</sup> 22'53.2	Groundwater
Surface Water				
Point 2 (Control Point)	Arakhuan Stream Inlet (OKM <sub>ARKHI</sub> )	N06 <sup>0</sup> 21'06.2"	E005 <sup>0</sup> 21.34.8"	Surface River Quality
Point 3	Arakhuan Stream Outlet (OKM <sub>ARKH3</sub> )	N06 <sup>0</sup> 18'23.0"	E005 <sup>0</sup> 22'08.0"	Surface River Quality
Air Quality & Noise Measurements				
Point 4	Ext. 1 Powerhouse	N06 <sup>0</sup> 22.457'	E005 <sup>0</sup> 22.923'	Air Quality & Noise
Point 5	Plantation Field (F61)	N06 <sup>0</sup> 21'01.8"	E005 <sup>0</sup> 22'02.2"	Air Quality & Noise
Point 6	Plantation Field (D82)	N06 <sup>0</sup> 19'41.7"	E005 <sup>0</sup> 22'18.1"	Air Quality & Noise
Point 7 (Control Point)	Plantation Field (A53)	N06 <sup>0</sup> 20'42.3"	E005 <sup>0</sup> 24'31.9"	Air Quality & Noise

Source: Okomu OPC Plc Environmental Audit (December 2020)

Environmental Laboratory Services Limited (Laboratory accredited by the Federal Ministry of Environment) carried out the analyses.

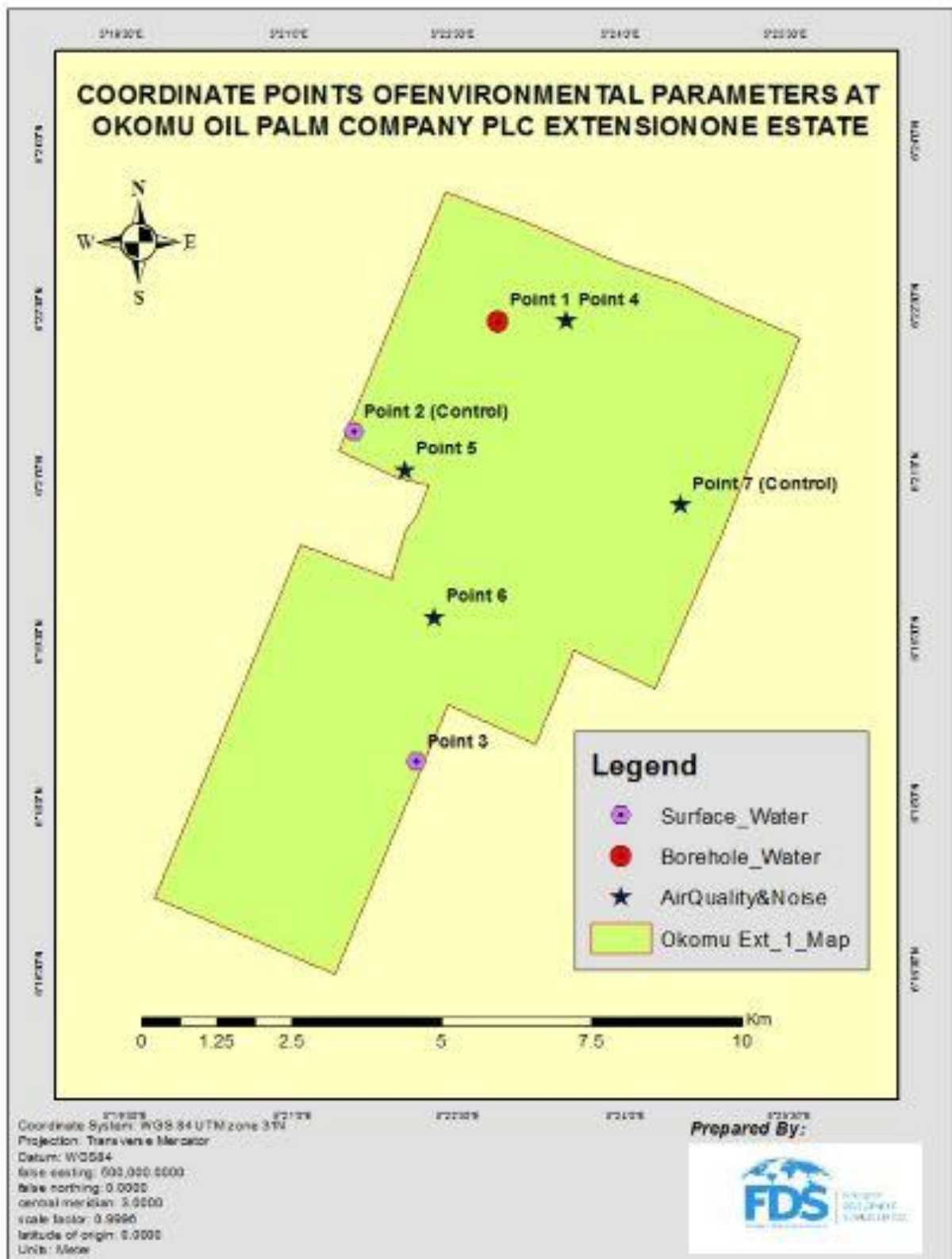


Figure 7: Extension One Estate Plantation Map Showing Sampling Points

Source: Okomu OPC Plc Environmental Audit (December 2020)

## **3.2 Study Approach**

The purpose of this environment description is to provide qualitative and quantitative information of the estate.

**3.2.1 Quality Assurance/Control Procedure:** The Quality Assurance/Control for laboratory analysis is in accordance with FMEnv recommended methods and it includes blank analysis to establish analytical level, duplicate analysis to establish analytical precision, spiked and blank sample analyses to determine analytical accuracy. It covers all aspects of the study, and includes sample collection, handling, laboratory analysis, data coding and manipulation, statistical analysis, presentation, and communication of results. Sample chain of custody form was used for the registration and tracking of sample from the field to the laboratory.

**3.2.2 Sample Collection and Handling:** This was carried out in accordance with Federal Ministry of Environment guidelines and standards (sampling and handling of samples). Where logistic and safety considerations precluded strict compliance with the above guidelines and standards, other proven, scientifically acceptable methods of sample collection and handling were used.

**3.2.3 Laboratory Analysis:** The methods of analysis used were as specified in the Federal Ministry of Environment guidelines and standards and other International Analytical Standards methods of analysis such as APHA for water quality. Trace metal analysis was done using Atomic Absorption spectrophotometer dully calibrated using standards, physicochemical parameters were determined using Thermoelectric Genesys 10 VIS Spectrophotometer and Orion ISE Meter Model 710A, dully calibrated with standards, as well as Flame Photometer.

**3.2.4 Statistical Analysis:** Errors in field data include those resulting from the instrument and those introduced by the observer. With proper sustained calibration of the instrument and the use of standardized observational procedures equipment, errors were brought to acceptable minimum. Errors often arise from two-stage sampling or sub sampling, or even from the fact that the samples collected are not representative samples of the medium. There are also spatial variations for the same medium, e.g., soil and water. Thus, it is taken, so as to establish a reasonable level of confidence in the results obtained. A good result is obtained when the variance is within 5% of the mean.



**3.2.5 Data Coding and Manipulation:** To ensure preservation of the integrity of data collected, data coding forms for use in the field, were designed in such a way that field data could be directly entered into computer data sheets. Since their analyses may be required in legal proceedings, it is essential to establish sample authenticity. Samples must be properly sealed and labeled. All data collected were labeled and the following information provided among others:

- Identification code or sample number
- Date and time of sampling
- Description of sample
- Methods of sampling
- Particulars of any photographs taken.

Where samples were sent to another laboratory for examination, a duplicate copy of this information was sent along with the sample to the laboratory, independent of the sample. All movements of the samples were included on the samples record. Basic information was recorded together with results of analysis, in a register.

### **3.3 Air Quality and Noise Level**

#### ***a) Air Temperature***

For air temperature and humidity of ambient conditions, a digital thermometer and Fisher Scientific Hygrometer were used, respectively.

#### ***b) Gases***

In-situ determination of the gases was carried out using portable gas analyzers. The ambient air was monitored using GasTech GT402 to measure the concentration of CO, O<sub>2</sub>, Non-methane hydrocarbons, and H<sub>2</sub>S. BWT Gas Alert was used to determine the concentration of NO<sub>2</sub> and Ogawa Passive Air Samplers were used for the sampling of SO<sub>2</sub> and subsequently analysed in the laboratory to determine the concentration of the gases.

#### ***c) Suspended Particulate Matter, (SPM)***

PPM 1055 Hand-held Aerosol Monitor was used to determine Suspended Particulate Matter (SPM).

#### ***d) Noise level measurement***

Sound level was measured at same point as that for air quality. A CEL-254 Sound level meter was first calibrated and re-checked before determining the sound level. The reading was allowed to stabilize before recording in decibel units {dB(A)}.

### **3.4 Ambient Environment**

#### ***3.4.1 Hydrogeology and Groundwater Quality***

Based on the result of analysis conducted on the samples, the quality of the water conformed to FMEnv limit for potable water aside being acidic. The groundwater quality is good and free from pollution. The pH value is 4.94 and thereby falling below the recommended limit of 6.5-8.5. Other physico-chemical and microbiological parameters were however within the permissible limits recommended by WHO and FMENV for wholesome water.

The low pH in the water sample can be raised to near neutral with the addition of soda ash/sodium hydroxide.

The full results of laboratory analyses of water samples are presented in **Appendix A**.

The results of laboratory analyses of one (1No.) groundwater and two (2Nos.) surface water samples are presented in Table 3.2 and 3.3 below.

**Table 3.2: Laboratory Analysis Results of Borehole Water Sample**

PARAMETER/UNIT	FMEnv Limit	Result
Appearance	Clear & Colourless	Clear & Colourless Liquid
pH @25.6 °C	6.5-8.5	4.94
Temperature, °C	Ambient	27.0
Conductivity, □S/cm	1000	41.6
Colour, Pt-Co	15	1
Turbidity, NTU	5	1
Total Solids, mg/L	-	24.9
Total Dissolved solids, mg/L	500	20.9
Total Suspended Solids, mg/L	-	4
Total Hardness, mg/L	150	2
Total Alkalinity, mg/L	-	7.7
Total acidity, mg/L	-	19.1
Calcium, mg/L	-	<1
Magnesium, mg/L	20	0.49
Chloride, mg/L	250	7.3
Nitrate, mg/L	50	0.3
Nitrite, mg/L	0.2	<0.001
Sulphate, mg/L	100	9
Phosphate, mg/L	-	<0.1
Free carbon dioxide, mg/L	-	16.84
Iron (total), mg/L	0.3	<0.01
Fluoride, mg/L	1.5	<0.1
Lead, mg/L	0.01	<0.001
Arsenic, mg/L	0.01	<0.001
Manganese, mg/L	0.2	<0.001
Copper, mg/L	1.0	<0.001
Cadmium, mg/L	0.03	<0.001
Chromium, mg/L	0.05	<0.001
Hydrogen Sulphide, mg/L	0.05	<0.01
Total coliform count, CFU/mL	10	Nil
Faecal coliform (E. coli), CFU/100	Nil	Nil
<i>Clostridium perfringens</i> , CFU/100	Nil	Nil
<i>Salmonella/Shigella sp.</i> , CFU/100	Nil	Nil
<i>Staphylococcus sp.</i> , CFU/100 mL	Nil	Nil
<i>Pseudomonas aureus</i> , CFU/100 mL	Nil	Nil
Total plate count, CFU/100 mL	10 <sup>2</sup>	4

Source: HSE Office, OOPC Plc (December 2020)

**Table 3.3: Laboratory Analysis Results of Surface Water Samples**

PARAMETER/UNIT	METHOD APHA, 23rd Edn.	OKM <sub>ARKHI</sub>	OKM <sub>ARKH3</sub>	FMEnv.
Appearance	Visual	Clear	Clear	Clear & Colourless
pH @ 28°C	Electrometric	5.61	5.89	6-9
Temperature, °C	Thermometer	26.0	26.1	Ambient
Conductivity, $\square$ S/cm	2510-B	26.1	20.6	2000
Colour, Pt-Co	2120-C	3	6	7.0
Turbidity, NTU	2130-B	<1	<1	10
Total Solids, mg/L	2540-B	13.4	10.3	-
Total Dissolved solids, mg/L	2540-C	13.4	10.3	1000
Total Suspended Solids, mg/L	2540-D	<1	<1	30
Total Hardness, mg/L	2340-C	10	2	-
Total Alkalinity, mg/L	2320-B	6.7	7.7	-
Total acidity, mg/L	2310-B	13.9	9.9	-
Calcium, mg/L as Ca	3500-B	1.2	0.80	-
Magnesium, mg/L as Mg	3500-B	1.7	<1	-
Salinity as Chloride, mg/L	4500-B	5.9	5.4	200
Nitrate, mg/L	4500-NO <sub>3</sub> -B	0.3	0.2	50
Nitrite, mg/L	4500-NO <sub>2</sub> -B	<0.01	<0.01	0.3
Sulphate, mg/L	4500-E	3	2	250
Phosphate, mg/L	4500-C	0.9	0.3	-
Iron (total), mg/L	3500-B	<0.01	0.02	20
Lead, mg/L	3500 -Pb-B	<0.01	<0.01	<1.0
Copper, mg/L	3500 -Cu-B	<0.01	<0.01	<1.0
Manganese, mg/L	3500 -Mn-B	<0.01	<0.01	0.10
Cadmium, mg/L	3500 -Cd-B	<0.001	<0.001	<1.0
Nickel, mg/L	3500 -Ni-B	<0.001	<0.001	<1.0
Cobalt, mg/L	3500 -Co-B	<0.001	<0.001	<1.0
Arsenic, mg/L	3500 -As-B	<0.001	<0.001	<1.0
Chemical Oxygen Demand, mg/L	5220-D	8	6	80
Biochem. Oxygen Demand, mg/L	5210-B	<1	<1	30
Dissolved Oxygen, mg/L	4500-G	8.4	7.2	>2.0
Total Hydrocarbon, mg/L	Spec.	<0.01	<0.01	-
Pesticides, mg/L	Screening	<0.01	<0.01	-
Total coliform count, MPN/mL	9225-D	16	20	10 <sup>2</sup>
Faecal coliform ( <i>E. coli</i> ),	9222-D	Nil	Nil	-
Total plate count, CFU/mL	9215-B	80	64	10 <sup>4</sup>

Source: HSE Office, OOPC Plc (December 2020)

### 3.4.2 Air Quality and Noise Level Measurements

In-situ determination of the gases was carried out using portable gas analyzers. The ambient air was monitored using Mattheson IQ-1000 gas analyzer (with mega and electrochemical sensors) to measure the concentrations of carbon monoxide, Oxygen, Non-methane hydrocarbons, hydrogen sulphide, Sulphur dioxide. BWT Gas Alert was used to determine the concentration of NO<sub>2</sub>. PPM 1055 Handheld Aerosol Monitor was used to determine Suspended Particulate Matter (SPM). Fisher Scientific Hygrometer was used to determine the temperature and humidity of ambient conditions during the sampling period.

The results of ambient air quality determination and noise measurements are presented in Table 3.4 and Table 3.5 below.

**Table 3.4: Result of Air Quality Measurements Carried Out within the Estate.**

Coordinate	<i>Extension One Powerhouse (500kVA)</i>	Field F61	Field D82	Field A53	FMEnv. Limit
	N06°22.457'	N06°21'01.8"	N06°9'41.7"	N06°20'42.3"	
	E005°22.923'	E005°22'02.2"	E005°22'18.1"	E005°24'31.9"	
Elevation, m	87	63	64	37	
Noise, dB(A)	79.2	27.2	33.4	33.3	<b>90</b>
SPM (µg/m <sup>3</sup> )	190	31	37	92	<b>250</b>
Humidity (%)	63.8	84.6	79.1	66.7	<b>Ambient</b>
Temperature (°C)	29.7	26.0	26.4	28.5	<b>Ambient</b>
Carbon monoxide, ppm	<1.0	<1.0	<1.0	<1.0	<b>10-20</b>
Carbon dioxide, %	0.38	0.31	0.27	0.33	<b>Ambient</b>
Hydrogen sulphide, ppm	<0.1	<0.1	<0.1	<0.1	<b>-</b>
Hydrocarbon, %	<0.1	<0.1	<0.1	<0.1	<b>-</b>
Oxygen, %	21.0	20.9	21.0	21.0	<b>21.0</b>
Sulphur dioxide, ppm	<0.01	<0.01	<0.01	<0.01	<b>0.01</b>
Nitrogen dioxide, ppm	<0.01	<0.01	<0.01	<0.01	<b>0.04 – 0.06</b>
VOC, ppm	<0.01	<0.01	<0.01	<0.01	

**VOC = Volatile Organic Compounds; SPM = Suspended Particulate Matter.**

**Source: HSE Office, OOPC Plc (December 2020)**

**Table 3.5: Result of Noise Level Measurements at Critical Areas within the Estate.**

<b>Location</b>	<b>Noise level, dBA</b>
Extension One Powerhouse (500kVA)	68.3
Nearest Residential block	55.2
Car washing bay	61.4
Pavilion 3	60.5
Field F61	38.4
Field D82	33.6
Field A53	39.9
<b>NESREA Standard (8-Hour Exposure)</b>	<b>90</b>

**Source: HSE Office, OOPC Plc (December 2020)**

### 3.5 General - Oil Palm and Rubber Plantation Management

ISSUE	GUIDELINES	CURRENT PRACTICE	REMARKS
• <b>Soil Conservation</b>	Practice reduced and zero tillage (often known as “low till” or “n till”) as well as direct seeding and planting, to minimize damage to soil structure, conserve soil organic matter, and reduce soil erosion.	Harrowing is done every 25 years with planting of cover crop.	This practice should always be adhered to when new planting commences.
	Minimize soil compaction, damage, or disturbance by using appropriate land preparation machinery at the right time of the year.	D8 machines are used instead of D9 dozer. In addition, heavy duty machines are not used when there is rainfall.	This practice should be sustained.
	Use cover crops such as, <i>Crotalaria</i> , <i>Canavalia</i> , <i>Mucuna</i> or <i>Tephrosia</i> ; intercropping along contours with legumes such as <i>Cajanus</i> , <i>Sesbania</i> , <i>Lupinus</i> , <i>Tritolium</i> , and creating multi species shelterbelts, and/or windbreaks to reduce evapotranspiration and soil loss through water erosion.	Interrow are ploughed and cover crops such as <i>Pueraria plaseoloides</i> and <i>Mucuna bra cteata</i> are broadcasted/ planted which grow vigorously and form a dense cover over the plantation (see Plate 3.1 below).	



**Plate 3.1: Established Groundcover in Mature Palms**

Replenish soil organic matter by recycling crop residues, compost, and manures	During harvesting and pruning operations, crop residues such as detached fronds are neatly packed in alternate rows which later decompose and restore the soil. So also, are empty fruit bunches (EFB) recycled in 500 hectares/annum. These later decompose and restore the soil nutrients.
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Implement earthworks when weather conditions pose the lowest risk of causing environmental damage	Roads are constructed and/or maintained with a durable surface to minimize erosion and these are usually done during dry season	No Action Required
Employ erosion control management practices (e.g., contour and strip planting, terracing, discontinuous trenching, intercropping with trees, and grass barriers) in sloping areas.	Erosion prevention and control are implemented through contour/panel and terrace planting.	No Action Required
Draw up mitigation plans for planting or harvest operations that must take place during unsuitable periods.	The group New Planting Procedure (NPP) is available to address this.	No Action Required
Use flow control wires and diversion canals to reduce erosion in areas with field drainage	There are some natural drains, and some constructed ones regularly maintained such as side/sedimentation pits. For the control of runoff especially on the plantation roads, sedimentation pits are dug to reduce runoff and trap sediments in runoff water as could be found across the plantation field as depicted in Plate 3.2 below.	No Action Required.



**Plate 3.2: Sedimentation and/or Side Pit on Roads**

Restrict the width of roads to the minimum that will provide the means for efficient and safe transport.	The width of road grading is usually 3m to 10m to avoid erosion and this is the usual practice across the plantation group.
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<ul style="list-style-type: none"> <li> <b>Maintaining Soil Productivity</b> </li> </ul>	<p>Cultivate crops that are suited or adapted to the local climate and soil conditions and adopt good agronomic practices to optimize crop productivity</p>	<p>Okomu-OPC usually cultivates crops that are suitable for the area, climate, and soil. Good agricultural practices are practiced.</p>	
	<p>Collect meteorological data on precipitation, evapotranspiration, temperature, photosynthetically active radiation, and use information to inform and guide agronomic and silviculture management techniques</p>	<p>There is a weather station by the nursery, equipped with rain gauge, thermometers and piche-evaporimeter to collect data on rainfall, temperatures, and evaporation, respectively.</p>	<p>Install in the meteorological station with wind vane to collect data on wind speed and wind direction.</p>
	<p>Use soil maps and soil survey results to determine crop suitability and appropriate soil management practices</p>	<p>Soil maps are used, and soil survey done every 5-10 years.</p>	<p>Always ensure that soil survey is done for new plantation development.</p>
<ul style="list-style-type: none"> <li> <b>Nutrient Management</b> </li> </ul>	<p>Develop and implement a soil monitoring and management plan that includes soil and terrain mapping and erosion risk identification.</p>	<p>This is done through identification of slopes with the aid of soil maps.</p>	
	<p>Conduct regular surveys to monitor soil structure and chemistry in order to identify areas where remedial action is required.</p>	<p>Soil survey done every 5-10 years.</p>	<p>See Above</p>
	<p>Recycle and/or incorporate organic materials (e.g., crop residues, compost, and manures) to replenish soil organic matter and improve soil water-holding capacity.</p>	<p>Crop residues most especially palm fronds are retained in the field and empty fruit bunches (EFB) applied to the oil palm as manure as depicted in Plate 3.3 and Plate 3.4 below.</p>	



**Plate 3.3: Palm Fronds Retained in the Field**



**Plate 3.4: EFB Applied in the Field as Manure**

Minimize the use of pesticides by implementing a pest and disease early warning system, by using biological pest and disease control methods, and by implementing control measures before outbreaks require large-scale control	The company has developed an integrated pesticide management programme that includes routine monitoring system every two months to observe pest attacks. The program provides for encouraging the use of birds as predators of oil palm pests and discourages the use of highly persistent and highly toxic pesticides.	No Action Required.
Use green manures, cover crops, or mulching techniques to maintain soil cover, reduce the loss of nutrients, replenish soil organic matter, and capture and/or conserve moisture	The main groundcover species are <i>Pueraria</i> and <i>Mucuna bracteata</i> , which grow vigorously and forms a dense cover over the plantation.  Where gentle slopes occur within the plantation, the palms have been planted in rows aligned with the contours, which provides an additional soil conservation measure.	No Action Required.
Incorporate nitrogen-fixing legume crop plants and cover crops in the cropping cycle.	The main groundcover species are <i>Pueraria</i> and <i>Mucuna bracteata</i> , which are rich in Nitrogen. They are also known as nitrogen-fixing leguminous crops.	No Action Required.
Draw up balanced fertilizer programs for each soil management unit based on the results of mapped fertility results, soil and leaf analysis, and crop assessment.	Leaf (Foliar) analysis is carried out such that fertilizer application is based on plant requirement.	Improve on this system
Time the application of crop nutrients to maximize uptake and minimize nutrient runoff.	Fertilizer applications are done during raining season but not heavy rains.	This practice should be sustained
Establish and respect setbacks from watercourses—including appropriate buffer zones, strips, or other “no-treatment” areas along water sources, rivers, streams, ponds, lakes, and ditches—to act as a filter for potential nutrient runoff from the land.	Buffer zone of about 50m to 150m along Riverbanks is created depending on the size of the river.	No Action Required
Select and maintain fertilizer application equipment to ensure desired application rates are used and overbroadcasting of solid fertilizers and overspraying liquid fertilizers are minimized.	Application is by manual and is measured by cup. Fertilizer applicators and agrochemical sprayers are under strict supervision. This is after receiving appropriate training on handling, storage, and transportation of hazardous substances.	Regularly give refresher training as at when due.

	<p>Implement nutrient planning and documentation, which includes the use of a fertilizer logbook to record the following information:</p> <ul style="list-style-type: none"> <li>▪ Dates of purchase, dates of use, amount of fertilizer and nutrient used (kg/ha), purpose of use, and crop growth stage.</li> <li>▪ Weather conditions before, during, and after application.</li> <li>▪ Methods used to minimize nutrient loss (e.g., incorporation into the soil, split applications, irrigation after application).</li> </ul> <p>Provide farm operators with training in nutrient management following published principles and agricultural practice manual. Ensure that all personnel are trained in and use appropriate management procedures for the storage, handling, and application of all types of fertilizers, including organic wastes.</p> <p>Personal Protective Equipment (PPE) should be used according to the Safety Data Sheets (SDSs) of the product or to a risk assessment of the fertilizer product. SDS should be available at each management unit.</p>	<p>Record of application is kept in a notebook and the monthly record manual at Plantation department.</p> <p>Record of purchase dates is also kept at both plantation departments for both oil palm and rubber.</p> <p>Daily reports are made for the number of kilograms applied per tree and per field depending on the number of the palms alive.</p> <p>Fertilizer rates are determined by fertilizer expert.</p> <p>Fertilizer and chemical training are ongoing.</p> <p>Appropriate PPE such as hand gloves, rain boots and raincoats are provided.</p> <p>Safety Data Sheets (SDSs) are available</p>	<p>Record keeping should be taken care of to meet with the reporting requirements of national and international sustainability standards (SON, ISO and RSPO).</p> <p>Intensify training on hazardous substance and hazardous waste management.</p> <p>Display SDS's by all chemicals and fertilizers.</p>
<p>▪ <b>Crop Residue and Solid Waste Management</b></p>	<p>Recycle residues and other organic materials by leaving the materials on site or through composting (and spreading).</p>	<p>Organic materials are left in the plantation field as manure.</p>	<p>No Action Required</p>
	<p>Consider the potential for harboring and spreading pests and diseases before implementing this practice.</p>	<p>Plantation department takes this factor greatly into consideration.</p>	<p>No Action Required</p>
	<p>Disperse (or mulch) large vegetative structures (e.g., trunks, branches), unless there are compelling habitat and biodiversity benefits identified in the Biodiversity Management Plan.</p>	<p>Done regularly with harvesting and pruning.</p>	

	Consider using crop residues for other beneficial purposes, such as animal feed, bedding, or thatching, when leaving residues in the field is neither practical nor appropriate.	Crop residues are left in the field as organic manure	No Action Required
• <b>Water Management</b>	Determine rain or water irrigation requirements of the crop based on internationally recognized guidelines while recognizing seasonal variations and regional norms. When irrigation is practiced, develop an appropriate irrigation plan, and schedule, and monitor consumption and compare regularly with these targets.	Sprinkler and sumisansui irrigation system are used in all the nurseries. The quantity of the water need per palm is given without waste.  Water use for irrigation is from groundwater sources which are pumped from boreholes to overhead storage tanks for distribution to the nursery.	
	Maintain soil structure and soil organic matter. Use of crop residues and mulches will assist in maintaining soil organic matter levels, retain soil humidity, and reduce surface evaporation.	Cover crop like <i>Pueraria plaseoloides</i> and <i>Mucuna bracteata</i> are used and the palm fronds are packed in the interrow during pruning and harvesting.	No Action Required
	Maximize the retention of rainwater through appropriate “rain harvesting” techniques, which may include:  Diverting water flow from roads and paths toward crops thus storing water in the soil and reducing the effect of short dry spells. Storing runoff from rainy periods for use during dry spells by using tanks, ponds, cisterns, and earth dams.	There are some natural drains, and some constructed ones regularly maintained such as side/sedimentation pits. For the control of runoff especially on the plantation roads, sedimentation pits are dug to trap runoff water and to also check and control erosion.	No Action Required
	Controlling weeds through the use of cover crops, mulching, or herbicides to encourage beneficial but low-water-use soil cover plants. Maintain protective vegetation in canals and drainage systems to reduce canal bank scouring and slow runoff.	The main groundcover species are <i>Pueraria</i> and <i>Mucuna bracteata</i> , which grow vigorously and forms a dense cover over the plantation.	

Maintain a water management logbook that records time and quantity of rainfall evaporation and the , amount of irrigation applied, and soil moisture levels (%), in order to verify both that irrigation is being used according to crop need and to develop an understanding of long-term trends in water use.

Reduce evaporation by avoiding irrigation during periods when evaporation is elevated (e.g., in periods of higher temperatures, reduced humidity, or high winds). Use trickle or drip irrigation techniques (if practical) or install “under canopy” rather than overhead sprinklers.

Reduce evapotranspiration by using shelterbelts and windbreaks.

Reduce seepage losses in supply channels by lining them or using closed pipes.

Consider collecting runoff water (tail water) through catchments and pumps.

Employ a cutback furrow irrigation technique, slowing or stopping irrigation well before the water reaches the end of the furrow and discharges to the environment.

If herbicides are used, ensure they are applied at the appropriate time of year to control undesirable vegetation and reduce their water consumption most effectively.

Regular maintenance of irrigation system is being practiced with a logbook to estimate water use. Irrigation is usually done in the morning and evening time.

No Action  
Required

• **Pesticide Management**

**The following measures are recommended to prevent and control the contamination of water sources: Avoid over-irrigation, which may result in the leaching of nutrients and contaminants.**

Use harvesting methods (such as directional felling) or other appropriate measures to minimize the number of debris deposited in streams.

Harvesting is done manually with debris deposited in the plantation field.

No Action Required

Establish and respect setbacks and buffer zones in riparian areas. Buffer widths should be based on the specific risk, land management regime, and slope of the area.

Buffer zone of about 50m to 150m along Riverbanks is created depending on the size of the river.

No Action Required

Remove harvest debris from streams and consider the use of debris traps such as trash lines where possible.

Have you identified the main pest associated or affecting the crop?

The main insect pest is the leaf miner. The company monitors pest numbers in the plantations by carrying out LMO checks monthly.

No Action Required

Do you apply early warning mechanism for pest and disease i.e. (pest and disease forecasting technique).

There is phyto-sanitary team in place monitoring pest out-break and by LMO checks monthly.

No Action Required

What other control measures are in place other than dependency on pesticide use? In terms of biological control (birds, mites).

Use of pruning

No Action Required

How do you store, handle, or apply pesticides?

Pesticides are stored in a safe storage area, separate from other products. Application is done only when necessary and with trained workers that are provided with adequate PPE. The storage is secure and well ventilated which meet safety requirements such as spill containment and safety signage.

The pesticide storage and use area should be upgraded to meet the requirements of the IFC Guideline for Pesticide

	Is there a pest management plan (PMP) that includes procedures for procurement, storage, handling, and ultimate destruction of all out-of-date stock?	There are no specific programmes in place for the management of hazardous materials.  Although, pesticides are moderately used and at the appropriate time usually at the beginning and toward the end of raining season.	Handling and Application (1998). The design should include secondary spill containment for the storage of chemicals, a water supply for cleaning, disposal of wastewater in an absorption trench, a workbench for maintenance of spray equipment, equipment storage, ventilation for dispersion of fumes and safety signs.
• <b>Pesticide Storage</b>	Do you store pesticides in a bonded container or in a sufficient space that will capture spill?	Pesticides are stored in sufficient space that can capture spill	No Action Required
	Verify if store is set away from water sources, residential and built-up areas as well as livestock and food storage areas.	Chemical store is not near any water sources, residential, food and livestock.	No Action Required
	Are there spill kits in place in case of accidental spillage?	Spill kits are provided at all hazardous substance storage area.	No Action Required
	Do you comply with storage instructions on the product label.	In full compliance with storage on product label.	
	How are spills cleaned?	Mop and collected back to the field	Appropriate spill kits are provided at all pesticide storage area.
	Do you have a register of all pesticide procured, records of when they were received, amount used and remaining in store.	Record available	
	Is there a SDS and is it appropriately located?	The company keeps an up-to-date inventory and safety data sheets (SDSs) are available and well displayed for all the chemicals in storage.	No Action Required

• <b>Pesticide Handling</b>	Do operators read, understand, and follow product label instructions for mixing, safe application, and disposal?	Pesticide handlers receive instructions on daily basis before going to the field.	This practice should be sustained
	Are personnel trained for critical operations such as mixing, transfers, filling of tanks and application?	Besides being given on the job instructions, pesticides handlers have also received a formal training on health and safety considerations in pesticides handling and use. While pre-employment medical examination is mandatory for pesticides applicators as basis for employment. More so, periodic medical examinations are provided for them.	Organize a regular formal training on the hazards, precautions, and procedures for safe storage, handling and use of all potentially harmful materials relevant to each employee's task and work area.
	Are appropriate PPE worn during handling and application e.g., gloves, overalls, and eye protection	Necessary precautions are taken on the issuance and handling of pesticides. All workers involved in the handling and use of pesticides are kitted with appropriate personal protective equipment. The PPE provided include protective clothing, hand gloves, eye goggles, caps, respirators, and boots. Washing facilities are also provided.	Enforce the use of appropriate PPE's when handling hazardous substance particularly agrochemicals
	Mixing and filling of pesticide tank should be set away from watercourse or drains and if it is on concrete, then water should be collected in a separate sump and disposed as hazardous waste.	Mixing of pesticide is usually done on bunded concrete tank.	Mixing should be confined to the pesticide mixing tank and this must be done with utmost caution.
• <b>Pesticide Application</b>	How is application done?	Pesticides are usually applied using knapsack sprayers. Sometimes ULV application is done using ULV sprayers, following strictly manufacturers' technical instructions. Pesticide applicators receive special training in the use and application of pesticides.	No Action Required
	Do you do aerial application?	No aerial spraying is done	No Action Required



• **Pesticide Disposal**

How is un-used dilute pesticide, out of date, rinse water disposed?

The company only takes stock of what is required (agrochemicals) from Main estate.

The company has not experienced any stock of outdated pesticides in recent time.

Develop contingency plan for expired hazardous chemical management including disposal.

How are empty containers, lids, and foil seals treated?

Waste packaging from fertilizer is well controlled throughout the plantation. Empty fertilizer bags are collected and re-used for loose fruit collection. Empty plastic and metal pesticides containers are usually returned to the store (secure) at Main estate waiting for evacuation by suppliers.

Ensure that agrochemical containers are properly rinsed (triple) and residual water applied to the plantation field.

Are there any agreements to how empty cans are taken off the plantation?

The company has reached an agreement with agrochemical suppliers to evacuate and return the empty containers to the manufacturers before the next supply.

Establish that the empty agrochemical containers are returned to the manufacturers.

• **Fertilizer**

How are fertilizers stored?

Fertilizers are stored on top of pallets. The store is well secured and always under lock. (See Plate 3.5 below)



**Plate 3.5: Fertilizer Stockpiled on Pallets**

No Action Required

Are fertilizers kept with pesticides and machinery? e.g., fuels, ignition, or heat source.

Fertilizers are kept separately from agrochemicals as shown in Plate 3.5 above.

No Action Required.

Are fertilizers purchased minimally and stored or purchased in large quantity even though there might not be immediate use for them?

Fertilizers are purchased minimally with usage based on first in, first out (FIFO) principle.

No Action Required.

Is fertilizer requirement known and applied as at when due?

Fertilizer requirement is known, and rate of application would appear economical in terms of requirement, quantity, timing, and methods.

• **Energy Use**

Consider implementing training programs to make operators aware of energy efficient practices when using machinery.

There is no programme in place to make operators aware of energy efficient practices.

Create awareness (formal or informal) on energy efficient practices such as switching off engines when waiting to load and all electrical appliances including air conditioners when leaving the office.

### 3.6 Environmental Sustainability and Planning

Issues	Indicator	Current Practice/Status	Comments
<b>Institutional workplace environment policy</b>	Institutional environmental sustainability policy	A formal Environmental and other Policies have been prepared and duly signed by the Managing Director	Conformed to national environmental legislation
<b>Structures to address environmental issues</b>	Environmental committee	Environmental Committee in place (see Figure 7).	The committee should be empowered by continuous training that will enable it overseeing environmental responsibility on the estate.
<b>Strategic plan and Service Charter</b>	Commitments	Yes	Conformed to legislation
<b>Compliance with the Environmental Impact Assessment and Environmental Audit</b>	Bi-annual environmental audit reports for Edo State and every 3 years for FMEnv, EIA reports for new projects, EMPs	The Company is up to date in the environmental audit of its facility and processes. All the previous Environmental Audit Reports were submitted to the Federal Controller office in Benin and Edo State and Ministry of Environment and Sustainability.	An EIA is not critical because the plantation was acquired before the EIA act. Environmental Audit (EA) is required in this regard.

#### 3.6.1 Sanitation and Housekeeping

Issues	Indicator	Current Practice/Status	Comments
<b>Sanitation</b>	Health, Safety and Environment (HSE) department in place	The Company has established and is operating a full fledged HSE department.	Conformed This practice should be sustained
<b>Housekeeping</b>		Housekeeping is fair across board.	Action Required to improving on the housekeeping across board.

#### 3.6.2 Pollution Control

Issues	Indicator	Current Practice/Status	Comments
<b>Water Pollution &amp; Control Measures</b>	Initiatives to prevent, protect and monitor water sources.	Quarterly laboratory analysis of all water sources is in place.	The results of laboratory analysis obtained during this audit show that both groundwater and surface water quality are good and free from pollution except

			<p>for low pH with 4.94 and 5.89-5.61 for borehole and surface water respectively, thus making the water to be acidic, which is below the FMEnv and WHO (2004) drinking water guideline of pH 6.5-8.5.</p> <p>See full laboratory analyses results of borehole water samples in Appendix A.</p>
<p><b>Air Pollution &amp; Control Measures</b></p>	<p>Initiatives to reduce Air pollution</p>	<p>Quarterly monitoring of source and ambient air quality has been put in place.</p>	<p>Audit findings show there is no air pollution at the facility and environs. The measurements carried out at the facilities show that the concentrations of gases and particulate matter monitored were within the FMEnv. Limit.</p> <p>The result has shown that some parameters such as Suspended Particulate Matter (SPM) ranges between 31-190<math>\mu\text{g}/\text{m}^3</math>; Carbon dioxide, &lt;0.27-0.38%; Hydrocarbon, &lt;0.1%; and Nitrogen oxides, &lt;0.01ppm which are within FMEnv permissible limits of 250 <math>\mu\text{g}/\text{m}^3</math>, ambient, nil and 0.04-0.06ppm respectively, while the full results and methodology are presented in Appendix B.</p>
<p>Noise Pollution &amp; Control Measures</p>	<p>Initiatives to reduce Noise</p>	<p>Soundproofing of generators and provision of ear protective device.</p>	<p>Audit findings show that there is no noise pollution on the estate including critical work areas. The measurements taken at different workplaces show that noise levels range from 33.6dB(A) – 68.6 dB(A) across the estate. (See Appendix B).</p>

Powerhouse	Appropriate designs for primary and secondary containments	There are designs for primary and secondary containments.	Conformed to Safety Standard
Fuel Storage	Pollution prevention measure	There are two (2Nos.) surface tanks at the filling station for fuel storage to store petroleum product mainly AGO with primary but no secondary containment to control soil pollution.	Non-Conformance.  The arrangement in the fuel storage area is poor.  In addition, fuel servicing is being done on bare ground.
<b>General Pollution Control Measure</b>	Pollution Abatement Provisions	<b><i>In-House Pollution Monitoring</i></b> The HSE department undertakes pollution monitoring as part of its oversight functions.	No Action Required
		<b><i>Potential for Accidental Spill Control/Management</i></b> The potential for accidental spills does exist and there are adequate measures in place to control accidental spill across board.	Action is Required
		<b><i>On-site/Off-Site Contingency Plan</i></b> There is a formal Emergency Response/Contingency Action Plans manual in place. The manual has taken into account both on-site and off-site emergency response and contingency plans for environmental sensitive activities and operations.	No Action Required
		<b><i>Pollution Complaints</i></b> No complaints relating to pollution have been received from the host communities in recent time.	

### 3.6.3 Waste Management

There is a comprehensive and detailed waste management plan in place which covers description of activities and waste handling up to waste disposal. The wide range of waste found on the estate is classified into solid waste, liquid waste and gaseous emissions.

Issues	Indicator	Current Practice/Status	Comments
Solid Waste Handling	Initiatives to segregate, reducing, reusing, and recycling of waste	<p><b>Storage:</b> At all the points of waste generation, waste bins/drums are provided for the immediate storage of different solid waste (see Plate 3.6 below).</p> <p><b>Collection and Transfer:</b> Containers are located at designated places to collect wastes. Wastes from the storage bins are emptied into the waste collection containers, waiting for transfer to the solid waste dumpsite.</p>	<p>The current practice of solid waste handling is fairly good but needs improvement in the area of plastic/nylon management.</p> <p><b>Red</b> - Household Waste Only</p> <p><b>Green</b>-Plastic &amp; Cellophane only</p> <p><b>Blue</b> - Aluminium Only</p> <p><b>Black</b> - Glass &amp; Broken Bottles Only</p>
		 <p><b>Plate 3.6: Colour Coded Bins for Solid Waste Storage</b></p>	
Liquid Waste Handling	Appropriate designs to collect wastewater and storm water	<p><b>Disposal:</b> The solid waste collected is transported by means of a tractor and disposed at the solid waste dumpsite at Main estate.</p> <p><b>Domestic Wastewater:</b> Domestic liquid waste is channeled into soak away pits attached to every building at residences and offices.</p>	<p>No Action is Required</p>
			<p>No Action Required</p> <p>Improve on wastewater handling at Labour Line Quarters.</p>

		<b>Storm water:</b> Rainstorm water is collected and channeled out into the plantation.	No Action Required
		<b>Septic Systems</b> Domestic sanitary sewage is channeled into septic systems attached to residential buildings and offices. The septic systems are good in terms of their locations and construction.	No Action Required
<b>Gaseous Waste Management</b>	Better maintenance of heavy machinery and equipment.	Maintenance of heavy machinery and equipment is done as contained in the maintenance schedule.	No Action Required

### 3.6.4 Waste Management Interventions

Issues	Indicator	Current Practice/Status	Comments
Waste Segregation		Most waste generated on the estate is organic in nature which is recycled in the field. Sorting is also done at the point of waste generation for domestic solid waste and at the solid waste dumpsite (see Plate 3.6 above and Plate 3.7 below).	The current practice of waste recycling in the plantation field is good and should be sustained. However, more efforts should be geared toward waste reduction and waste reuse to accomplish the 3R's principle of waste management (Reduce, Reuse and Recycle)
Waste Reduction			
Waste Reuse	Initiatives to segregate, reducing, reusing, and recycling of waste		
Waste Recycling			
Waste Generation	Modes of waste handling (generation, transportation and disposal)	Solid waste generated are collected in colour coded bins and transported by bucket mounted tractor to the solid waste dumpsite at Main estate.	The mode of waste transportation is good but can still be improved upon by avoiding flight tipping as much as practically possible.
Waste Disposal	Government Approved Solid Waste Dumpsite	The Company operates an in-house solid waste dumpsite which is compartmentalized for different waste stream including domestic solid waste (see Plate 3.7 below).	The Company has a valid permit from Edo State Ministry of Environment to operate the in-house solid waste dumpsite.





Plate 3.7: Solid Waste Dumpsite

### 3.6.5 Climate Change (Adaptation & Mitigation)

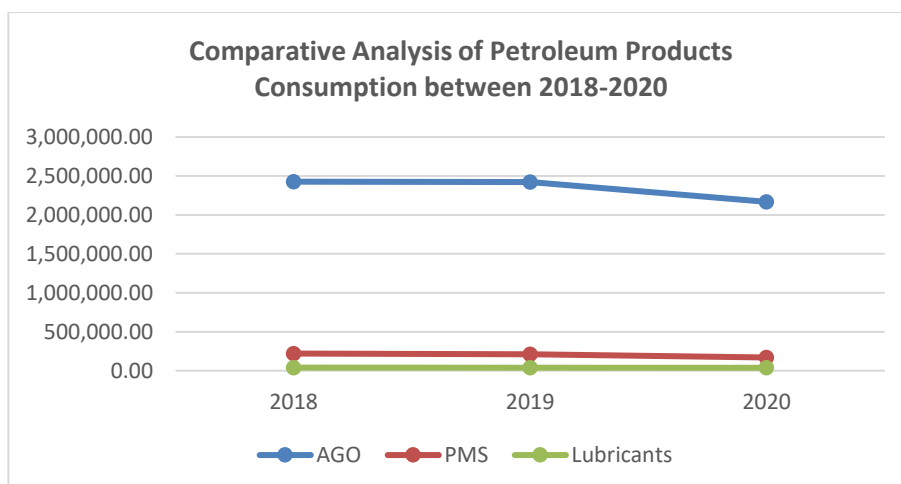
Issues	Indicator	Current Practice/Status	Comments
Energy Saving Initiatives	Initiatives to Conserve energy	Petroleum hydrocarbon is the main source of energy on the estate. The record of fuel and lubricant consumption has been kept and consumption trend seems to have been established as indicated in Table 3.6 below (Main estate inclusive).	This is good and commendable, but energy use targets need to be set.

Table 3.6: Fuel Type and Consumption

Petroleum Product	Fuel Consumption (Litres)		
	2018	2019	2020
AGO	2,427,116.04	2,420,695.00	2,168,239.00
PMS	219,896.00	211,478.00	169,385.00
Lubricants	39,497.40	38,429.00	36,752.00

Source: HSE Department, OOPC Plc (2020)





**Figure 8: Fuel and Lubricant Consumption in 2018, 2019 and 2020**

#### Soil Conservation

Initiatives to reduce evapotranspiration and soil loss through water erosion, which may include:

- Use flow control wires and diversion canals to reduce erosion in areas with field drainage.

There are some natural drains and some constructed ones maintained regularly such as side/sedimentation pits. For the control of runoff especially on the plantation roads, sedimentation/trap pits are dug to reduce runoff and trap sediments in runoff water as could be found across the plantation field (see Plate 3.2).

Some of the rainwater retention initiatives being adopted by the estate is commendable but can still be improved upon.

#### Measures to control greenhouse gases

- Sources of on-farm GHG emissions and establishment of a GHG management plan that includes methods of mitigating emissions and a monitoring program.

The emission sources and air emission potential of the estate are presented in Table 3.7 below.

**Table 3.7: Emission Sources on the Estate**

Sources	Location	Air Emission
Point Source	Powerhouse, solid waste dumpsite	NOx, SO <sub>2</sub> , CO, CO <sub>2</sub> , Suspended Particulate Matter (SPM), H <sub>2</sub> S, VOCs.
Fugitive	Earth roads, unpaved ground	PM, NOx, SOx, CO
Mobile Sources	Tractors, Machinery	NOx, SO <sub>2</sub> , CO, VOCs and Particulate Matter,

However, the ambient air quality was recently determined in-situ for critical locations during this audit as presented in Appendix B.

Initiatives to reduce fossil energy use by adopting energy-efficient production and management practices.

No programme in place yet to make operators aware of energy efficient practices.

Action Required

### 3.6.6 Promoting Environmental Protection through Partnerships with Stakeholders

Issues	Indicator	Current Practice/Status	Comments
Environmental projects and activities undertaken through partnerships with stakeholders	Projects and activities undertaken jointly. MoUs Joint management plans	There are no known environmental projects and activities that have been undertaken jointly with stakeholders particularly the host communities except those that were done by OOPC Plc for the host communities (CSR).	This is Good and Commendable.
Corporate Social Responsibility (CSR) on Environment	CSR initiatives in place	<p>The company has a ‘Host Community Policy’ and has undertaken a number of community development projects to demonstrate its spirit of partnership and goodwill to the host communities. The full CSR undertaken in 2018 and 2019 and 2020 are presented in Appendix D while the areas where the support projects were undertaken are presented below.</p> <ul style="list-style-type: none"> <li>• Road maintenance</li> <li>• Educational support such as stipends to teachers and scholarship awards.</li> <li>• Electricity Project</li> <li>• Skill Acquisition Development</li> <li>• Construction of Town Hall</li> </ul>	This practice is good and does conform to best management practices.
Partnerships with FMEnv on Monitoring and inspections to ensure compliance with environment legislation	Areas of partnerships with FMEnv on Monitoring and inspections to ensure compliance with environment legislation	There is a partnership in place with both State and Federal ministry of environment especially in the area of environmental compliance monitoring.	<p>This is in conformity with State and Federal Environmental laws.</p> <p>This should be sustained.</p>

### 3.6.7 Environmental and Ecological Enhancements

Issues	Indicator	Current Practice/Status	Comments
Wetlands, River banks, lakeshores, and seashore management	Rehabilitation initiatives	Not applicable.	Action Not Required
Conservation of biological diversity and Environmental significant areas	Conservation initiatives	Conservation areas known as HCVs (414.82 hectares) have been established within the estate.	Good and commendable
Environmental restoration	Degraded lands secured, restored and conserved	No degraded lands on the estate.	Action Not Required

### 3.6.8 Environmental Education and Awareness

Issues	Indicator	Current Practice/Status	Comments
Behaviour change towards the environment	Proof of positive behaviour change	Safety committee being coordinated by HSE department is charged with the responsibility of creating awareness on the plantation estate.	There is a great environmental awareness among the workers and communities. This was apparent during this audit exercise.
Participation in environmental events with communities and schools	Evidence of Participation in environmental events.	HSE week is conducted every year (annually) on the estate.	Action Required. Include Occupational Health and environment in the awareness campaign with schools and communities engaged in the implementation
Sensitization of staff and public on Environmental sustainability relevant to the institutional mandate.	Sensitized staff on environmental sustainability through IEC materials	There are information, Education, and Communication (IEC) boards on environment, occupational health, and safety at strategic locations on the estate.	This is good and should be sustained.
Recognition of environmental champions	Evidence of appreciation of environmental sustainability champions	The company is involved in co-sponsoring many environmental programmes at state and Federal levels.	This is good and should be sustained.

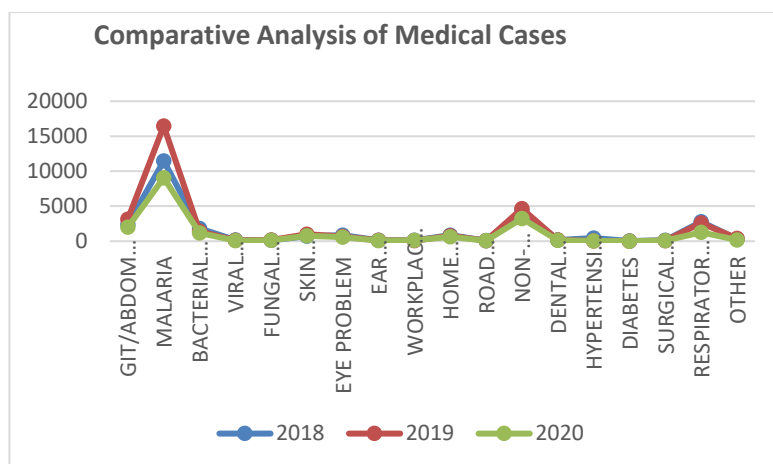
## 3.6.9 Health Issues

Issues	Indicator	Current Practice/Status	Comments
Occupational Illnesses	Analysis of Occupational Illnesses.	Occupational illnesses are documented on daily basis and also analyzed.  Malaria (9058) was the most common illness treated in 2020 followed by Non-Industrial Musculo-skeletal Problems (3248), followed by Gastrointestinal Tract (GIT) and Abdominal Problems (1262) against what was recorded in 2018 and 2019 as presented in Table 3.8 below (Main estate inclusive):	This practice is good and should be sustained.  Action Not Required

**Table 3.8: Occupational Illnesses Recorded in 2020**

AILMENTS	TOTAL		
	2018	2019	2020
GIT/ABDOMINAL PROBLEMS	2377	3128	2018
MALARIA	11469	16445	9058
BACTERIAL INFECTIONS	1811	1413	1157
VIRAL INFECTIONS	173	130	69
FUNGAL INFECTIONS	146	183	113
SKIN INFECTIONS	704	979	770
EYE PROBLEM	838	694	563
EAR PROBLEM	140	133	86
WORKPLACE INJURIES	104	66	112
HOME ACCIDENTS /INJURY	860	744	632
ROAD TRANSPORT ACCIDENTS (RTA)	86	58	77
NON-INDUSTRIAL MUSCULO-SKELETAL PROBLEMS	4394	4639	3248
DENTAL DISEASES	178	150	109
HYPERTENSIVE DISEASES	437	50	54
DIABETES	24	3	5
SURGICAL PATIENTS	138	86	72
RESPIRATORY PROBLEMS	2796	2611	1262
OTHER	285	410	183

Source: HSE Department, OOPC Plc (2020)



**Figure 9: Comparative Analysis of Medical Cases Treated in 2018, 2019 & 2020**

Analysis of Industrial Accidents and Fatalities

Records of industrial incidents, accidents and fatality are compiled.

Action Required

Health Screening & Monitoring

Accidents and Diseases Monitoring

The plantation operates on-site medical services for workers. Both on-site and off-site accidents records are kept and also reported to the appropriate regulatory authorities.

Commendable and should be sustained

### 3.6.10 Safety Issues

Some of the operations in the plantation field, stores, and office involve both single and multiple exposures to physical hazards with potential for accident or injury or illness due to repetitive exposure to mechanical action or work activity as presented below.

Issues	Indicator	Current Practice/Status	Comments
Occupational Hazards	Physical Hazards	Appropriate personal protective equipment (PPE) is provided.	Action Required
	Chemical Hazards	Adequate provisions are put in place such as appropriate personal protective equipment (PPE) provided for workers.	Action Required
	Biological hazards	There are no activities or processes that require the use of biological agents and there have been no reported health cases that are linked to suspected presence of biological agents at workplaces.	No Action Required
	Radiological Hazards	There are no activities involving occupational and/or natural exposure to ionizing radiation.	
Risk Assessment	Initiatives to conduct a comprehensive risk assessment	Risk assessment and analysis for all jobs and tasks have been conducted in recent time.	This is good and commendable.  Action Not Required
Work Procedures	Initiatives to document work procedure	Work procedures were neither displayed nor sighted during the audit.	Action Required
PPE	Commitment	As part of the prevention and control measures for the identified hazards, some PPE have been provided for workers. The PPE issued to workers would appear adequate. The level of use of PPE by workers is high. It would seem that enforcement level by management is high and proper use of PPE has been communicated to workers. Some of the PPE provided to workers include helmet, aprons (overall), safety boots, eye goggles, hand gloves, ear muffs and nose masks etc.	The level of compliance to PPE usage is remarkably high and should be sustained.  Action Not Required
Safety Education	Initiatives on safety Education	Safety education is evident on the estate.	The level of safety education is fair but commendable
Signage	Initiatives to Signage Production especially traffic safety	There is several signage on the estate and are strategically sign posted.	There is potential for accident as there are few traffic signage on major roads in the plantation which is commendable.

Fire Safety (Prevention & Control Measures)	Risk of Fire and Explosion	All the office has fire detectors for fire surveillance. Stand-by water tankers and fire extinguishers are the provisions made for firefighting on the estate.	The measures will seem to be adequate for plantation operation. Action Not Required
	Initiatives on Fire Fighting Equipment Systems	There is a security patrol team for fire detection and control. The provision for fire control/fighting include: <ul style="list-style-type: none"> <li>• Trained fire fighters</li> <li>• Fire extinguishers</li> <li>• Sand buckets</li> <li>• Fire hydrants</li> <li>• Stand-by Water Tankers</li> <li>• Fire Fighting Procedure</li> </ul>	Action not Required
	Initiatives on Emergency Response Plan for Fire	There is Emergency Response Procedure in place so also is emergency response plan for fire for all facilities (see Appendix C).	Action not Required
Fire Drills	HSE department in place	There is a full-fledged HSE department in place and there are records to show that fire drills have been conducted in recent time.	This should be sustained. Action Not Required.

### **3.6.11 Conformance to Legislation Issues**

#### **3.6.11.1 Environmental, Health and Safety Laws and Regulations**

<b>Issues</b>	<b>Indicator</b>	<b>Current Practice/Status</b>	<b>Comments</b>
Establishment of HSE Department	HSE department in place	There is a full-fledged HSE department in place.	Conformed to national environmental legislation.
Submissions to Regulatory Bodies	Commitment	The Company is committed in this regard. Submissions to regulatory bodies are made when necessary.	This is good and should be sustained. Action Not Required

### 3.6.12 Environmental, Health & Safety Permits

Issues	Indicator	Current Practice/Status	Comments
Permits/Licenses/ Approvals	Initiatives to Obtain applicable Permits/Licenses/ Approvals	The Company has obtained some permits, licenses and approvals to cover certain processes and operations. However, quite a number of permits remain outstanding as presented in Table 3.9 below.	Conformance to Legislation is fair. But lack of necessary document can hinder the smooth operation of the plantation and/or estate.

**Table 3.9: Health and Safety Permits/Licenses**

Operations/Processes	Requirement (Permit/License/ Approval)	Status: Obtained/Not Obtained	Date Obtained	Expiry Date
Solid Waste Dumpsite	Permit	Paid Nov. 2020, Awaiting Certificate	Oct 2020	Oct 2022
Storage of Petroleum Products	License	Obtained	15/04/2019	31/12/2020
Food Handlers Test	Certificate	Obtained	2020	2021
Clinic	License	Obtained	07/02/2019	Feb. 2021
Fire Safety	Certificate	Obtained	20/08/2020	19/08/2021
Pressure Testing of Fuel Storage Tanks	Certificate	Obtained	30/03/2016	29-03-2021
EIA Permit for Extension One Oil Palm and Rubber Plantation Expansion Development Project	EIS/Permit	Obtained	Feb. 2019	

Environmental and Other Policies	Commitment	The Company has a written and articulated environmental and other policies, duly signed by the Managing Director (see Appendix F).	Good and Commendable Action Not Required
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### 3.6.13 Community and Industrial Relations

Issues	Indicator	Current Practice/Status	Comments
Employment	Initiative	The company employs workers including expatriates and Nigerians at management, senior and junior cadres. Both genders are employed.	Good and Commendable. Action Not Required
Child Labour	Initiatives to prepare Child Labour Policy	The company does not give employment to underage workers at all cadre and there is a policy document in place forbidden child labour.	Good and Commendable. Action Not Required
Employment Opportunities	Commitment	The company does not discriminate in its employment policy. However, priority is given to employing suitably qualified workers from the host communities.	Good and Commendable. Action Not Required
Welfare	Commitment	The Company operates with due respect to the Nigerian Industrial Labour laws. The workers have freedom to belong and participate in labour union activities and workers belong to the Agricultural and Allied Workers Union of Nigeria (AAWUN). This allows for collective bargaining, honesty and communication in both directions. The Company offers competitive wages and welfare packages (salaries plus allowances and bonuses) for all categories of staff as stipulated by RSPO Guidelines.	Conformed to national environmental legislation.  Action Not Required

**Legend:**

No Action Required	Commendable	Action Required
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## **CHAPTER FOUR**

### **Life Cycle Analysis**

Life cycle analysis (LCA) is a method used to evaluate the environmental impact of a product through its life cycle encompassing extraction and processing of the raw materials, manufacturing, distribution, use, recycling, and final disposal.

Since a comprehensive analysis is impossible, we decided, explicitly or implicitly considered to use the techniques of Life-cycle assessment to assess all environmental impacts associated with all the stages of Extension One estate from plantation maintenance through harvesting and tapping, waste generation and disposal or recycling. This techniques help avoid a narrow outlook on environmental concerns by assisting in:

- Compiling an inventory of relevant energy and material inputs and environmental releases;
- Evaluating the potential impacts associated with identified inputs and releases; interpreting the results to help make a more informed decision.

#### **4.1 Material Input, Output and Balance**

Table 4.1 contains materials that are used on the estate. The unit of the materials is well inserted. They are merely in liters (Ltrs), kilograms (kgs), metric tons (MT), cubic meters (m<sup>3</sup>) and Normal cubic meters (Ncm<sup>3</sup>) such as the output for natural gas. For understanding, the materials have been entered in columns, from 1 to 5 in addition to the one identified as unit. Column 1 means materials available in the store, column 2 connotes materials required for the year. Column 3 is the material that is being ordered to make up for the required one. The difference between column 2 and 5 is the stock difference (balance- column 4) which were not used on the plantation estate. Column 5 indicates material taken from the store and used on the plantation field. Column 6 is the FFB output.

**Table 4.1: Material Balance at Okomu-OPC Plc – Extension One Estate**

Material	Material Control						
	Unit	(1)	(2)	(3)	(4)	(5)	(6)
		Stock (Current)	Required	Order	Stock Difference (Physical Use- Required)	Physical Use (Stock Current + Order)	Output
Agrochemicals	Liters	0	46,965.32	46,965.32	0	46,965.32	
Fertilizer	kg	0	2,556,978	2,556,978	0	2,556,978	
FFB	228,166 Tons Processed						5,2370.3 Tons
AGO	Liters	0	2,168,239.00	2,168,239.00	0	2,168,239.00	
PMS	Liters	0	169,385.00	169,385.00	0	169,385.00	
Lubricants	Liters	0	36,752.00	36,752.00	0	36,752.00	

Source: HSE Department, OOPC Plc (2020)

## CHAPTER FIVE

### 5.0 Waste Management

There is a detailed and well-articulated waste management plans (WMP) to cover description of activities and waste handling by the estate (see Appendix C). More so, the company's waste management practices were observed during this audit and its present environmental management system (EMS) was ascertained.

#### 5.1 Waste Classification

The wide range of waste generated on the estate is classified into solid waste, liquid waste and gaseous emissions.

#### 5.2 Waste Generation and Sources

The largest amount of solid waste is generated from the plantation field, which is mostly organic in nature, but the residential areas generate the liquid waste, while the bulk of the gaseous emission comes from the powerhouse. The waste profile is presented in Table 5.1.

#### 5.3 Solid Waste Handling

**5.3.1 Storage:** At all the points of waste generation, colour coded waste bins are provided for the immediate storage of solid waste. Sorting and segregation of solid waste start from the point of generation (see Plate 3.11).

**5.3.2 Collection and Transfer:** Waste collection and transfer include the provision of a truck to collect and transport the collected waste to the solid waste dumpsite at Main estate. The company has a valid permit from Edo State Ministry of Environment and Sustainability to operate the solid waste dumpsite.

**5.3.3 Disposal:** The solid waste collected is transported and disposed of at the solid waste dumpsite (see Plate 3.7).

#### 5.4 Liquid Waste Handling

**5.4.1 Wastewater:** Wastewater (domestic) is channeled into soak-away pits of varying dimension attached to every building. The dimension of the soak-away depends on the size of the building.

**5.4.2 Storm water:** Rainstorm water is collected in channels and led into natural drainage lines and vegetation.

**Table 5.1: Okomu OPC Plc Extension One Estate Waste Profile**

Project Phase	Waste Characterization		
	Solid	Liquid	Gaseous
Field Maintenance	<ul style="list-style-type: none"> <li>• Agrochemical containers</li> <li>• Fertilizer bags</li> <li>• Used drums and buckets</li> </ul>	<ul style="list-style-type: none"> <li>• Wastewater</li> <li>• Spent Oil</li> </ul>	<ul style="list-style-type: none"> <li>• Fugitive Dust</li> <li>• Suspended Particulate</li> <li>• Carbon dioxide</li> <li>• Carbon monoxide</li> </ul>
Harvesting/Tapping	<ul style="list-style-type: none"> <li>• Papers/plastics/glass</li> <li>• Scrap office equipment</li> <li>• Spout</li> <li>• Used drums and buckets</li> </ul>	<ul style="list-style-type: none"> <li>• Wastewater</li> <li>• Spent Oil</li> </ul>	<ul style="list-style-type: none"> <li>• Carbon dioxide</li> <li>• Carbon monoxide</li> <li>• Fumes</li> </ul>
Offices	<ul style="list-style-type: none"> <li>• Papers</li> <li>• Hardware and scraps</li> <li>• Plastics</li> <li>• Metals</li> </ul>	<ul style="list-style-type: none"> <li>• Wastewater</li> </ul>	<ul style="list-style-type: none"> <li>• Carbon dioxide</li> </ul>
Stores	<ul style="list-style-type: none"> <li>• Papers,</li> <li>• Plastics</li> <li>• Nylon</li> <li>• Wood</li> <li>• Hand gloves &amp; Nose masks</li> </ul>	<ul style="list-style-type: none"> <li>• Wastewater</li> </ul>	<ul style="list-style-type: none"> <li>• Carbon dioxide</li> <li>• Chemical fumes</li> <li>• Fumes/Vapour</li> </ul>
<i>Powerhouse</i>	<ul style="list-style-type: none"> <li>• Plastics</li> <li>• Empty cans</li> <li>• Electric cables</li> </ul>	<ul style="list-style-type: none"> <li>• Wastewater</li> <li>• Spilled Oil</li> <li>• Spent Oil</li> </ul>	<ul style="list-style-type: none"> <li>• Suspended Particulate</li> <li>• Carbon dioxide</li> <li>• Carbon monoxide</li> </ul>

**Source: HSE Department, OOPC Plc (2020)**

### 5.5 Waste Re-use/Re-cycling

As much as possible, waste is minimized and a place is designated for keeping all reusable/Recyclable waste such as scrap metals, while essentially organic waste is recycled in the plantation field and spent oil taking to the Main estate to be sold to prospectus buyers for recycling.

### 5.6 Waste Manifest and Tracking

A manifest system has been established.

### 5.7 Waste Treatment

Waste treatment on the estate is as presented in Table 5.2 below:

**Table 5.2: Okomu OPC Extension One Waste Treatment System**

<b>Types of Waste</b>	<b>Management System</b>
Domestic Waste	Composting at the Approved Solid Waste Dumpsite within the estate
Medical Waste	Incinerated in the Boiler at the Palm Oil Mill
e-waste	Evacuated by selling to approved vendors in the state
Hazardous waste mainly empty agrochemical containers	Evacuated by agrochemical suppliers as part of the contract agreement
Batteries	Evacuated by prospective buyers
Metal Scraps	Evacuated by selling to prospective buyers
Spent Oil	Evacuated by prospective buyers

## **CHAPTER SIX**

### **Impact Evaluation**

#### **6.1 Introduction**

The primary intention of this Environmental Audit Report (EAuR) is to systematically identify, analyze and evaluate the impacts of the oil palm plantation on the estate and, develop an environmental action plan to correct the environmental effects of activities of the estate.

In this section of the report therefore, we present concise information on the current impacts that have been so identified, which have been classified into environmental and social impacts.

This chapter presents an overview of the impact assessment methodology as well as results of impacts identified followed by detailed qualitative and quantitative impact analyses with respect to groundwater, surface river, noise measurements and air quality using national and international acceptable methodology.

#### **6.2 Significant Negative Impacts**

In this section, only activity-receptor relationships resulting in impact significance are presented and discussed. In the analysis, the environmental receptors are considered collectively as they relate to facility operations.

##### **6.2.1 Evaluation of Identified Impacts of Plantation Operation**

###### ***6.2.1.1 Weeding***

In mature oil palm and rubber plantation, unwanted weeds are removed from the ground cover by manual clearing with cutlass. There is then the problem of disposal of removed weeds which are therefore allowed to gradually decay or rot. Many invertebrate fauna may be killed during or after weeding. Weeding removes the cover for wildlife such as amphibians, snakes and small mammals. Predator birds such as the black kites and owls increase in numbers in recently weeded plantations to locate exposed and moving prey.

###### ***6.2.1.2 Vegetation and Spoil Disposal***

Soil accumulated during harrowing and stumping and felled vegetation will have to be removed and deposited somewhere. Accumulation of soil spoils, if not removed, may alter water drainage pattern and reduce landscape beauty. Disposal of the vegetation and soil spoils will give opportunity for employment in the communities.

#### ***6.2.1.3 Ploughing, Grading and Leveling of Tracks and Roads***

There is the possibility of initiation of erosion because the topsoil in the affected areas is loose and coarse-grained.

#### ***6.2.1.4 Increased Transportation and use of Heavy Machinery during Land Preparation***

Wildlife presence in the affected area may be reduced due to unusual and frequent high level noise from tractor-drawn ploughs and harrows and chain saws. During the raining season, the access earth roads/tracks may be rendered inaccessible due to activity of these vehicles.

#### ***6.2.1.5 Herbicides, Fungicides and Insecticides Application.***

The estate uses agrochemicals to control weeds and pests. However, the possibility of carriage of residue from the plantation field to any surface water is extremely remote.

#### ***6.2.1.6 Fertilizer Application***

In order to increase productivity of oil palm fruit bunches and wet rubber per unit area, fertilizers are applied at various stages. At the nursery, in each bag of soils, fertilizers are applied such as NPK, borax, potash, sulphate of ammonia. Ashes of burnt kernel shells from boiler furnace are also applied as fertilizers. Not all nutrients added to the soil as fertilizers are taken up by the growing palm. Residues ( $\text{NO}_3$ ,  $\text{PO}_4$ ) may remain in the soil and end up in surface waters through storm water runoffs or be leached out of the soil and enter groundwater. High nitrate level in drinking water sources cause health risks particularly in children. It reacts with haemoglobin causing methemoglobinemia which impairs respiratory gases transport. Nitrites and nitrates can form nitrosamines, which are carcinogenic, mutagenic and tetratogenic (Odiete, 1999). At Okomu OPC Plc, the ashes from the boiler furnace and palm kernel cake make excellent fertilizers and are applied widely throughout the entire plantation. Therefore, the possibility of high levels of nitrite and nitrates in groundwater is very remote.

#### ***6.2.1.7 Transportation of Fresh Fruit Bunches and Cup Lumps***

During harvesting, fronds are pruned. This helps to give easy access to the ripe fruit bunches as well as keep the oil palm stem clean of hanging dead and decaying leaves. The fronds are left on the ground to add organic matter to the soil. The pruning of fronds, harvesting, collection of fruit bunches, tapping and collection of cup lumps are activities which provide employment for more workers.



#### **6.2.1.8 Decommissioning and Abandonment**

- Permanent and casual workers will be laid off resulting in loss of employment and income, although severance payment will also be made to permanent workers. But this can itself give rise to strained relations between workers/community and the company.
- The plantation will no longer be regularly and properly maintained including no weeding, no pest control, no maintenance of roads and tracks, no pruning of palm fronts. There will be great economic loss to the company and shareholders and the nation. The plantation will become densely populated by weeds, pests and many invertebrates' fauna and small to medium size wildlife.
- The land area might need to be restored back to its original state and this includes felling the palm trees as well as planting trees. This will portend a great economic loss to the company in addition to the already incurred losses.
- Removal of equipment and ancillary facilities such as chemicals, ploughs, tractors, harrows, trucks and other farm machinery will generate excessive noise and also a potential for accident.
- Return of land area to State Government which can generate conflicts between the affected communities and the local authority.

#### **6.2.2 Significant Impact Producing Activities**

The significant impact producing activities (IPAs) are as follow:

- Weeding in young plantation and manual removal of unwanted weeds with cutlass in mature planting.
- Fertilizer Application: mainly ash from boiler is applied. Also, other chemical fertilizer application may affect groundwater as a result of runoffs and leaching. Others include;
- Pruning, harvesting, tapping, collection of fruit bunches and cup lumps.
- Transportation of Fresh Fruit Bunches (FFBs) and cup lumps from the fields to the palm oil mill and rubber factory for processing at Main estate of the company.
- Laying off workers/Severance Payment
- Lack of care of plantation
- Decommissioning and abandonment have three main activities which will produce adverse impacts as listed in *section 6.2.1.8* above.

### **6.3 Significant Positive Impacts**

The following are some of the potential positive social impacts of the estate activities and operations:

- a.) Creation of Employment:* The activities and operations of the estate creates thousands of new jobs. The various activities including palm nursery development and maintenance, plantation land preparation, planting and harvesting are all labor-intensive activities and also gives employment to the affected communities; a significant tool for reducing rural unemployment and rural poverty.
- b.) Improved Planting Material:* Introduction of high yielding types of oil palm and sustainable management of palm plantation practices.
- c.) Capacity Building:* Training and capacity building for employees and smallholders is ongoing, including knowledge and technology transfer in the application of best practices and delivery of world class products and services in the oil palm industry.
- d.) Corporate Social Responsibility:* Development of the local communities through Corporate Social Responsibility of the Okomu Oil Palm Company Plc.
- e.) Taxes:* Tax revenue for the Edo State Government.
- f.) Smallholder Development:* Significant positive impacts for smallholder schemes.
- g.) SME Development:* Commercial opportunities for small and medium scale enterprises including petty trading.
- h.) Infrastructure Development:* The company's corporate social responsibility includes different infrastructure development projects for the communities. It was obvious from socio-economic survey that the affected communities of the proposed oil palm plantation development project lack the desirable infrastructure out of prolonged government neglect. The affected communities are therefore have been enjoying considerable infrastructure development in their respective communities.

## **6.4 Cumulative Impacts**

Cumulative impacts are changes to the environment that are caused by an activity in combination with other past, present and future human activities. (GSI, 2003). The concept of cumulative effects is an important one. It holds that, while impacts may be small individually, the overall impact of all environmental changes affecting the receptors taken together can be significant. When a resource is nearing its tolerance threshold, a small change can push it over. The objective of the cumulative impact assessment is to identify those environmental and/or socio-economic aspects that may not on their own constitute a significant impact but when combined with impacts from past, present, or reasonably foreseeable future activities associated with this and/or other projects, result in a larger and more significant impact[s].

- **Project Specific Cumulative Effects' Assessment**

This section evaluates the cumulative effects of the individual impacts evaluated in the preceding sections.

- ***Land Based Traffic***

It is envisioned that land-based traffic will also increase as a result of the estate operations and activities. Land-based traffic is eminent to allow the FFB and cup lumps that are harvested to be transported for processing at the palm oil mill and rubber factory at the Main estate of the company. However, the operations at the estate have a negligible impact on traffic after considering all measures put in place by the management to mitigate the problem. No additional cumulative transportation impacts have been identified in recent time.

- ***Public Services***

There is no impact to public services under the present operations of the estate. The operations and activities of the estate have not introduced any additional long-term population or employment into the area, and thus, have not resulted in any additional demand for police or fire services or the need for new or altered facilities. No damage to roadways has been recorded except which would be considered normal wear and tear. Therefore, the operation of the estate has resulted in negligible impact on public utilities.

- ***Employment Opportunities***

There have been some beneficial impacts that are cumulative that are in the employment sector. The plantation estate has employed enormous number of workers – all Nigerian. Positive cumulative social benefits include gainful employment and tax being paid to government coffer.

## **6.5 Known Overall Impacts of Large Oil Palm and Rubber Plantation Cultivation and Management**

These include:

- Loss of resources of lowland rainforest and land for indigenous people
- Transformation of the forest into a monoculture farm
- Many insects and insect pests flourish in oil palm plantation due to absence of natural enemies.
- Loss/disappearance/displacement of many wildlife species.
- Employment and income generation will be enhanced
- Pollution of the soil and adjacent surface water and groundwater by pesticides and excessive use of fertilizers – No surface river close to this estate.
- Buildup of dry and decaying fronds leaves and other organic matter under plantation posing a fire hazard.
- Rapid spread of unwanted weeds.

## **6.6 Public Health Impact (PHI) of Extension One Estate Operations**

The public health impact assessment of the estate is a rapid appraisal of the likely health impacts the estate operation might have on the totality of the environment. The assessment will consist simply of a summary table and a conclusion. The summary table shall list the intermediate factors and their likely impacts with minimal qualification.

### **6.6.1 Identifying Intermediate Factors that Impact on Health**

Many operations that are not intended to affect health directly have indirect effects on health and wellbeing, often these indirect effects have not been recognized. Operation may affect things such as employment, income, air quality or housing which in turn affect health. These factors which are not health indicators but do influence health are referred to as intermediate factors. (They may also be called determinants of health).

Some of the identified intermediate factors of the estate activities and/or operations are:

- Air Quality
- Water Quality and Hydrology
- Noise and Vibration
- Health and Safety
- Traffic and transport
- Waste Management
- Workers' Welfare
- Social cohesion
- Corporate Image

**Table 6.1: Summary of Public Health Impacts of Okomu OPC Plc- Extension One Estate Operations.**

<b>Intermediate Factor</b>	<b>Affected Group</b>	<b>Health Impact</b>	<b>Mitigation measures Put in Place</b>
<b>Air Quality</b>  Dust and gaseous emissions from land preparation and vehicular emission leading to high suspended particulates in the atmosphere.	All	<ul style="list-style-type: none"> <li>- Allergy</li> <li>- Eye irritation Nose irritation</li> <li>- Respiratory Tract Infections</li> <li>- Skin burn leading to skin cancer</li> </ul>	<ul style="list-style-type: none"> <li>- Low-emission/high efficiency engines are used.</li> <li>- Regular maintenance of vehicles to ensure optimal performance</li> <li>- Movement of men and materials are properly coordinated to optimize vehicle use and resultant emissions.</li> <li>- Dust and particulate barriers are used during operation.</li> <li>- No burning on site (i.e., zero burning).</li> </ul>
<b>Noise and Vibration</b>  Noise emissions generated by heavy duty vehicles and workers activities	All	<ul style="list-style-type: none"> <li>- Hearing impairment, hypertension, annoyance, sleep disturbance of site workers.</li> <li>- Hand-Arm Vibration Syndrome (HAVS)</li> </ul>	<ul style="list-style-type: none"> <li>- Noise attenuation measures such as acoustic mufflers are fixed on large engines and equipment;</li> <li>- Hearing protection is provided and usage enforced for workers on site.</li> <li>- Plantation operations are carried out during daytime only.</li> </ul>
<b>Water Quality and Hydrology</b>  Increased receiving water body turbidity from runoff and from the plantation.	All	<ul style="list-style-type: none"> <li>- Illnesses including Typhoid, Cholera, Dysentery, Polio, Hepatitis</li> </ul>	<ul style="list-style-type: none"> <li>- Adequate buffer zones between surface Water and planting areas have been established.</li> <li>- Re-fueling and maintenance of heavy construction vehicles at the site are done at specified areas and temporary storage of oily waste.</li> <li>- Nutrients (such as fertilizer and soil conditioner) application are minimally done.</li> </ul>

<b>Solid Waste</b> <ul style="list-style-type: none"> <li>- Solid waste constituting aesthetic nuisance</li> <li>- Sewage nuisance</li> </ul>	All	Improper solid waste handling can lead to the following: <ul style="list-style-type: none"> <li>- Creating conditions favourable to the survival and growth of microbial pathogens</li> <li>- Causing infectious and chronic diseases especially the waste workers.</li> </ul>	<ul style="list-style-type: none"> <li>- Waste is contained and removed regularly.</li> </ul>
<b>Hostility</b> Land acquisition and take-over conflicts between the communities and the company.	Workers and Communities	<ul style="list-style-type: none"> <li>- Youth restiveness</li> <li>- Persistence conflicts between community and company</li> <li>- Hostages</li> </ul>	<ul style="list-style-type: none"> <li>- Grievance and conflict resolution mechanism has been instituted.</li> <li>- Company employs as much local labour as possible.</li> </ul>
<b>Waste Management</b> <ul style="list-style-type: none"> <li>- Accumulated waste could lead to contamination of soil/groundwater and breeding grounds for vectors and rodents</li> </ul>	All	Health hazards associated with poor waste management include: <ul style="list-style-type: none"> <li>- Skin and blood infections resulting from direct contact with waste.</li> <li>- Different diseases such as intestinal infections that result from poor waste management.</li> <li>- Genetic mutilation</li> <li>- Reduction in aquatic food supply</li> <li>- Disruption of food chain</li> </ul>	<ul style="list-style-type: none"> <li>- <b>The company</b> has a waste and pollution management plan in place that addresses the management of all categories of waste generated on the estate.</li> </ul>

<b>Sewage</b> - Feacal aesthetic issues for the project area. - Spillage of septic liquor	Workers	- Cholera - Dysentery - Infectious and chronic diseases	- On-site toilets are made available for use
<b>Socio-economics</b> - Promiscuity - Sexual harassment - Youth Militancy - Unemployment - grievances	All	- Sexually transmitted diseases (STDs) - HIV/AIDS - Population explosion	<b>The company</b> has been operating cordially with the host communities through regular engagement with the community leaders
<b>Workers' Welfare</b> Especially when workers leave the organization and/or layoff.	Workers	- Depression - Hypertension - Workers' restiveness	<b>The company</b> always ensures that workers receive their full benefits when leaving the organization.
<b>Corporate Image</b>  The negative corporate image arising from day-to-day activities of the organization,	Company/All	- Annoyance - Depression	<b>The company</b> always ensures that its day-to-day activities and operations do not portend bad image about the organization to the general public and therefore has been operating according to the best industry standards and practice.

**\* Note: "All" in the Affected Group column means, "Totality of the Environment" including Flora and Fauna and Humans.**

The main negative impacts are health and safety. However, mitigation measures have been put in place for health and safety through the provision of appropriate PPE. Similarly, there is a buffer zone (50-150m) between planting areas and surface water body with minimal application of fertilizer and agrochemicals to avoid eutrophication.

As a result of the above provisions and measures, the net public health impact of the estate operations is positive.

## **6.7 Socio-economic and Social Impact Analysis**

A quick appraisal on socio-economic of the six (6) communities/camps, namely, Adeola, Bisi, Evboruiebor, Gbole-Uba, Ofunoma and Opuama was carried out in December 2020 taking cognizance of the comprehensive Social Impact Analysis (SIA) that was carried out in 2018. The extracts from the report are presented as follows:

### **6.7.1 Communities/Camps**

The respective community/camp locations are as follows:

#### **6.7.1.1 Adeola Camp**

The name Adeola in Yoruba means “*Crown of wealth*”. Adeola community is a Yoruba speaking community in Ovia South West LGA in Edo State, Nigeria. The settlement started in 2013 by the farmers disengaged from Olomu camp after the commencement of Extension One. The community is a tenant in the Extension One oil palm plantation field of OOPC and shares boundaries with Asamara, Extension One plantation, Akande camp and Hassan camp on the North, South, East and West. respectively. The landlord to Adeola camp is Gbole-Uba community. The GPS coordinates of this camp are N6° 19’8.68” and E5°23’26.9”. The community has a linear settlement pattern. It is about 75km by road to Iguobazuwa (Ovia South West LGA headquarters) and about 100km to Benin City.

#### **6.7.1.2 Bisi Camp**

Bisi was the first man in the camp, and the name Bisi in Yoruba means “*Be fruitful*”. The camp is a Yoruba speaking community in Ovia South West LGA in Edo State, Nigeria. The community is a tenant in the Extension One oil palm plantation field of OOPC and shares boundaries with Ikowa, Asamara, Gbole-Uba and Hassan camp on the North, South, East and West, respectively. Bisi camp has two landlords which are Gbole-Uba and Evboiruebor communities. The GPS coordinates of this camp are N6° 17’40.8” and E5°22’15.4”.

#### **6.7.1.3 Evboiruebor Community**

Evboiruebor, which translates to “*I came to establish*”, is an Edo speaking community in Ovia Southwest LGA in Edo State, Nigeria. The community was founded by Mr. Iruebor and nine followers in compartment 77, Area BC 10 of Okomu forest reserve. The community is a landlord in the Extension One oil palm plantation field of OOPC and shares boundaries with Bisi camp, Akande camp, Inikorogha and Hassan camp on the North, South, East and West respectively. The GPS coordinates of the community are N6° 18’15.4” and E5°22’50.4”.



#### **6.7.1.4 Gbole-Uba Community**

Gbole-Uba is the 5<sup>th</sup> oldest of the 6 Ijaw communities that make up the Olodiamia clan. Gbole-Uba, which translates to “*Creeks that joined together*”, is an Ijaw speaking community in Ovia South West LGA in Edo State, Nigeria. The community was founded by Efeke the great grand grandson of Perezigha of Ikoko community at about 1280 AD. The community is a landlord in the Extension One oil palm plantation field of OOPC and shares boundaries with Ekehuan, Udo, Ikoro, and Inikorogha the North, South, East and West, respectively. The GPS coordinates of the community are N6° 17’23.35”<sup>1</sup> and E5°23’18.12”.

The settlement pattern in the community is both linear and nuclear. It is about 100km by road to Iguobazuwa (Ovia South West LGA headquarters) and about 150km to Benin City.

#### **6.7.1.5 Ofunama Community**

The name Ofunama, means “*The town of birds*”, is the headquarters of Egbema clan which cuts across Edo and Delta States. This is an Ijaw speaking community in Ovia South West LGA in Edo State, Nigeria. The community is a landlord in the Extension One oil palm plantation field of OOPC and shares boundaries with Inikorogha, Ogbinbiri, Jamaige and Gbeobaon the North, South, East and West, respectively. The community has six tenant communities generally referred to as camps and these are Seiveinmor, Ikobou, Ugbo, Okwuba, Balogun and Ojobou. The GPS coordinates of the community are N6° 8’59.9” and E5°12’59.95”. The community has a combination of linear and nuclear settlement pattern. It can be accessed by road and water; and is about 100km by road to Iguobazuwa (Ovia South West LGA headquarters) and about 120km to Benin City also by road only in the dry season. Through water transport, the community is 2.5 hours to Iguobazuwa and 2 hours to Benin City respectively.

#### **6.7.1.6 Opuama Community**

Opuama, which translates to “*Big town*”, is an Ijaw speaking community in Ovia Southwest LGA in Edo State, Nigeria. The community is a landlord in the Extension One oil palm plantation field of OOPC and shares boundaries with Ikoka, Ikoro, Omokuru and Gbole-Uba on the North, South, East and West, respectively. The GPS coordinates of the community are N6° 21’1.99” and E5°25’44.15”. The community has a nuclear settlement pattern and is about 100km by road to Iguobazuwa (Ovia Southwest LGA headquarters) and about 125km to Benin City (Edo State Capital).

### **6.7.2 Study Approach and Methodology**

Methodology adopted for the study in the six (6) camps/communities involved triangulation of various sources of data with the use of tools relevant to Participating Rural Appraisal (PRA) and Socio-Economic Assessment.

For the result to be successful, under listed steps were applied:

- Formal stakeholders' meetings with the two local communities of the estate
- Scoping: This is the process of identifying, defining and prioritizing the social components to be addressed in the social assessment. The impact of the project was assessed in terms of the following impact criteria:
  - ✓ *Scale*: Physical scale/areas which the impact would be felt (local or regional).
  - ✓ *Duration*: Length of time the impact would likely be felt (short term, medium term and long term).
  - ✓ *Severity*: The intensity of the impact.
  - ✓ *Direction*: Whether the impact is positive (beneficial) or negative (adverse).

### **6.7.3 Data Collection**

In order to facilitate accurate information dissemination from each community, the following tools were used.

- Designed checklists were used to enlist information and data in the six communities as well as other internal and external stakeholders of the respective communities such as community executives, Local Government representatives, and so on.
- Interview of key informants in each community to obtain divergent views on the issues at stake and how to address them.

### **6.7.4 Review of Relevant Document**

Secondary facts were gathered from journals, archives, publications and internet. The gathering and review of published and unpublished baseline/project data were not left out.

### **6.7.5 Community Socioeconomic Conditions**

Human development is measured by the Human Development Index (HDI). This index actually measures the average achievements in a locality or country in three basic dimensions of human development: a long and healthy life, knowledge and a decent standard of living.

This section is an exposition of situations of the communities addressing the following elements in specific terms:

- a. Demography
- b. Social composition
- c. Social Amenities
- d. Economic Activities
- e. Livelihood Strategies

**Table 6.2: Schedule of SIA Exercise**

S/No.	Communities / Camps	SIA Field Exercise	Attendance			Checklist authentication
			M	F	Total	
1.	Adeola camp	9/11/2016	7	3	10	Oyinloye Jimoh (08032950573)
2.	Bisi camp	10/11/2016	17	1	18	Taiwo Olawuyi (08036503500)
3.	Evboiruebor	10/11/2016	13	5	18	Uwubanmwon Monday (08141712849)
4.	Gbole-Uba	9/11/2016	22	14	36	Kekegha Michael (08039539055)
5.	Ofunama	11/11/2016	30	7	37	Chief Hon. D.K. Agagha (JP) (08143241080)
6.	Opuama	9/11/2016	21	-	21	Paul Edomi (08160923379)

#### 6.7.6 General Socioeconomic Status

Fundamental precondition for sustainable development is empowerment of people, referring to their education. By educating them, the key barrier to human development – human mind – can be surpassed. Means for achieving sustainable human development are rule of law, respect for human rights, economic development, social development, environmental development, and creation of adequate norms and regimes. Many peace-building practices around the world reflect how development is connected to safety of people. Safe environment is a precondition for implementation of any kind of developmental projects, which further influence the wellbeing of population. A population with more satisfied basic needs is less likely to turn to violence in solving its problems.

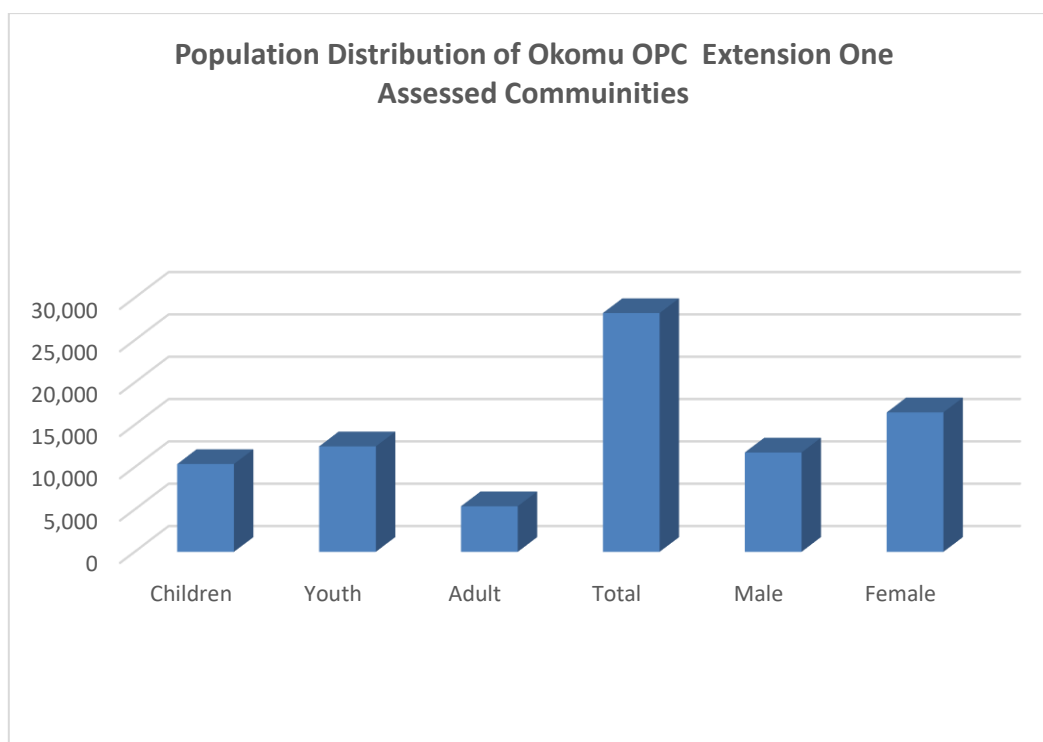
Nigeria's HDI index for 2014 UNDP 2015 report) was 0.514, which put the country in the low human development category, positioning it at 152 of 188 countries. The socioeconomic conditions of the 6 communities/camps studied are very low and reflect the Nigeria HDI.

### 6.7.6.1 General Demography

Most Nigerians live in rural areas, with an average settlement having 5,000 or less inhabitants. Out of the six assessed communities of extension one estate, only two (2) have estimated population above 500 (community sources). A dominant feature of the structure of the population of the affected communities is its significant skew towards young people with 79.3% of the population below the age of 45 years. Adults in the age group 45 years and above constitute about 20.7 % of the population (Table 6.3). The cumulative population of all the affected communities is 28,200. The sex ratio of the total population in the assessed communities was 0.632 (632 males per 1 000 females) which is lesser than Nigerian sex ratio of 1.026 (United Nations Department of Economic and Social Affairs-Population Division, 2015). The implications are that there are more vulnerable and dependent groups as well as quest for family labour. Hence, the practice of polygamy. Therefore, the pressure on the few available infrastructures would definitely increase. Rural population growth (annual %) in Nigeria was last measured at 1.07 in 2014 (World Bank, 2014).

**Table 6.3: Demographic Data**

S/No.	Community	Children	Youth	Adult	Total	Male	Female	Christianity		Housing Roofing	
								%	Church	Thatched	Zinc
	<b>Extension One Estate:</b>										
1	Adeola camp	150	120	30	<b>300</b>	<b>250</b>	<b>50</b>	83	1	30%	70%
2	Bisi camp	100	150	50	<b>300</b>	<b>180</b>	<b>120</b>	70	2	5%	95%
3	Evboiruebor	100	60	40	<b>200</b>	<b>70</b>	<b>130</b>	90	2	53%	47%
4	Gbole-Uba	800	1,000	200	<b>2,000</b>	<b>1,000</b>	<b>1,000</b>	77	3	40%	60%
5	Ofunama	9,000	11,000	5,000	<b>25,000</b>	<b>10,000</b>	<b>15,000</b>	69	13	1%	99%
6	Opuama	220	120	60	<b>400</b>	<b>230</b>	<b>170</b>	80	-	67%	33%
<b>TOTAL</b>		<b>10,370</b>	<b>12,450</b>	<b>5,380</b>	<b>28,200</b>	<b>11,730</b>	<b>16,470</b>		<b>21</b>		



**Figure 10: Demographic Data of Okomu OPC Extension One Assessed Communities**

#### **6.7.6.2 Settlement Pattern and Housing**

The settlement is generally gently sloping susceptible to erosion. Two communities out of six assessed communities/camps have a combination of linear and nuclear settlement patterns with different housing patterns, and the remaining four communities have nuclear settlement patterns.

Housing is one of the three essential things of life and the housing pattern of the people in the assessed communities is below SDG goals with less than 5% living in cement block houses. Four (4) out of Six assessed communities/camps have 70% and above houses roofed with zinc, while only two (2) communities/camps have houses between 40% and 67% thatched roofed (Table 6.3 above).

#### **6.7.6.3 Social Composition**

In respect to religious characterization, Christianity tends to dominate in most of the communities assessed with an average of 71% of the members being Christians, and this is followed by members who are adherents of traditional religion and Islam. Cumulatively, the number of churches is 93, despite this difference in belief, there is harmony and balance in all the communities.

#### **6.7.6.3.1 Social Amenities**

Generally, the level of government presence in terms of infrastructure and institutions in the operational areas of extension one estate is abysmally nonexistence. The few functioning amenities in some of these communities and camps are mainly provided by Okomu OPC. Most of the dwellers embark on journey on untarred rural roads, and virtually all the dwellers from camps travelled on bad untarred roads and paths, which consumed more time than necessary. Since time is a resource, the state of these roads contributes to income loss and impoverishes the assessed operational area's communities; many of them went through great difficulties to evacuate their farm produce from the farms to nearby markets due to bad road network. In spite of few boreholes provided by Okomu OPC, in most communities and camps, people still fetch water from streams for their domestic use which could be unsafe for their health and well-being.

The role of infrastructural facilities in grassroot development and poverty reduction cannot be over-emphasized whether in urban or rural environments. McNeil (1993) shows that adequate infrastructure reduces the costs of production, which affects profitability, levels of output, and employment. When infrastructure works, productivity and labour increase; and when it does not work, citizens suffer, particularly the poor. Thus, economic renewal and societal welfare become postponed or halted.

The general state of infrastructural development in the study area is poor with communities' members undergoing considerable difficulties in their daily existence as a result of this. The provision of boreholes to landlord communities as well as educational support all by Okomu OPC received commendations and encomium from communities concerned.

#### **6.7.6.3.2 Education**

Okomu OPC provided textbooks in major subjects to all the pupils and students in primary and secondary. There has been yearly skill acquisition organized by Okomu OPC for the communities with 2 to 8 slots per community. Okomu OPC also has been providing bursary to students of tertiary institutions annually to indigenes of the landlord communities between 2 and 6 slots.

**Table 6.4: Summary of Education Issues.**

Issue	Subject	Objective Analysis
Education	<ul style="list-style-type: none"> <li>• Level of education</li> <li>• Quality of education</li> <li>• Skills building programme</li> <li>• Education by gender</li> </ul>	<p>Medium</p> <p>Low due to absence of qualified teachers</p> <p>Medium</p> <p>Not applicable</p>

#### 6.4.6.3.3 Health

There is only one health centre at Ofunama which lacks nurses and doctor, and medicines. The summary of health-related issue in Extension One assessed communities is contained in the Table 6.5 below.

**Table 6.5: Health and Related Issues**

Issue	Subject	Objective Analysis
Health	<ul style="list-style-type: none"> <li>• Level of health</li> <li>• Access to clean water</li> <li>• Access to latrine</li> <li>• Hygiene behavior</li> </ul>	<p>Poor</p> <p>Extremely difficult in camps</p> <p>Fair with provision of sanitary pavilions by OOPC</p> <p>Fair</p>

#### 6.7.6.3.4 Agriculture and Household Nutrition

Farming and agricultural activities are rain fed and at subsistence level. Men are more engaged in farming (usually with the assistance of children/youth) than women. A wide range of crops is cultivated especially cocoa, plantain/banana, maize, cassava, vegetables, and root/tuber crops. Apart from being one of the main traditional occupations of the people, it is also practiced mostly by the natives due to the community's land ownership structures.

The assets used in agricultural activities are as follows:

**Human Assets:** The people employ traditional farming skills such as:

- Land management skills, like rotational bush fallowing, in cultivation of crops
- Maintenance of local farm tools
- Fairly good marketing skills but growth and opportunity in the commodity value chains are not developed.

**Natural Assets:** These include farmland, soil and topography and favorable climate.

**Physical Assets:** Farmers own hoes, cutlass, spades, wheelbarrow, basins, basket, and other equipment.

**Social Assets:** There is low level of social integration due to subsistence level of farming practice as well as poverty.

The rainy season (March/April to October/November) is associated with peak cropping seasons especially arable crop cultivation whilst the dry season is used for harvesting, marketing, and land preparation for the next farming season.

The level of poverty in all the communities is very high as the standard of living is very low and rudimentary. Though the communities are rich in agricultural produce, due to the lack of processing facilities, most of their crops get spoilt early because of lack of storage facilities for this produce.

Water resources and forest natural resources (such as honey, snail etc.) are continuously utilized over the years, but now threatened due to Okomu oil palm and rubber development while over dependence on forest resources for domestic energy requirement (firewood) has considerably led to deforestation and vegetation depletion.

The nutrition/food security issue in all the assessed communities is contained in the Table 6.6 below.

**Table 6.6: Household Nutrition and Food Issue**

Issue	Subject	Objective Analysis
Food Security	• Food consumption pattern	Garri + Native soup, Plantain + Pepper Soup
	• Access to food	Throughout the year. High consumption (January – June) & Low consumption (July – December)
	• Diet diversity	Available
	• Number of meals	3 times daily
	• Difficult periods of the year	July – September
	• Changes in food consumption	None
	• Differences in consumption <ul style="list-style-type: none"> <li>- Gender</li> <li>- Age</li> </ul>	Male & female eat the same food. No difference.



### 6.7.6.3.5 Livelihoods and Natural Resources

The communities and camps of the operational areas of Extension One are rich in human and natural resources, especially unskilled labour. However, the communities and camps are underdeveloped in terms of modern infrastructure, socio-economic well-being, and incomes. There are potentials to expand the economic and income opportunities in these communities. These include the following, among others.

- The abundant resources especially land, forest, human and physical in the community that support enterprise and development.
- Existence of social groups that provide various services.
- The relative peaceful co-existence in the community.
- Availability of labour for farming and other activities.

The summary of resource base and utilization in the area is presented in Table 6.7 below.

**Table 6.7: Resource Base and Utilization in most Communities**

Resource Category	Resource Name / Class		Notes
Rich but hardly tapped	(i)	Reserved forest	Legislation by government especially at Udo
Rich and well tapped	(i)	Fertile Land	Available and well utilized.
	(ii)	Forest products	-Use mostly for domestic purpose but few for commercial - natural herbal medicines and non-timber forest resources
	(iii)	Stream	Domestic
Threatened	(i)	Wildlife	Hunting pressure and forest clearing for oil palm plantation as well as rubber

**Table 6.8: Resource Base and Utilization of Riverine Communities especially in Ofunama**

<b>Resource Category</b>	<b>Resource Name / Class</b>		<b>Notes</b>
Rich but hardly tapped.	(i)	Raffia Palm	Abundant raffia palm but hardly tapped due to inadequate knowledge of necessary technology.
	(ii)	Crude oil	Full Exploration yet to commence. - But beyond the know-how and financial scope of the communities, requires investment from external enterprise.
Rich and well tapped	(i)	Sand	Wined both manually and mechanically for livelihoods and sand filling of the community.
	(ii)	Land	Available and well utilized.
	(iii)	Creeks and rivers	For fishing and marine transportation.
Threatened	(i)	Aquatic life	Due to activities of the sand dredgers and resultant effect of oil exploration activities

#### **6.7.6.3.6 Pattern of Conflicts**

The communities and camps of Extension One operational areas are relatively peaceful as the people live harmoniously together, there exist potential conflict triggers and conflict resolution mechanisms as highlighted below.

##### **(a) Potential Conflict Triggers**

There are four main potential conflict triggers in the area namely:

- Land encroachment between families
- Poor information dissemination
- Usurping of community benefits
- Political differences (APC vs PDP)

##### **(b) Severity and Frequency**

Intra-communal conflicts and intra-household at domestic level are quite frequent and could be severe but do not usually threaten the corporate existence of any of the communities/camps. This is because effective traditional conflicts resolution mechanisms are in place to solve these and well respected and subscribed.

Inter community conflicts especially armed mass conflict could be severe and threaten the peaceful coexistence between communities. The resolutions of such conflicts sometimes end with the traditional organs at the clan level. Even chieftaincy title tussle could threaten the peaceful coexistence of stakeholders within the community concerned and the resolution of such end with the clan

held especially Oba of Benin (the highest level of traditional authority in Benin land) with Udo as case in reference.

**(c) Mediation and Conflict Resolution Efforts**

Virtually all the communities/camps are relatively peaceful and co-existence among each community members are characterized by love, peace and unity. Each community head with his Council of Chiefs/Elders and the Community Development Association (CDA) are mainly charged with conflict resolution within the community while a third party might be involved to resolve inter communal conflicts. This notwithstanding, some conflicts end up in law court and / or with law enforcement agents for resolution.

**(d) Impacts of Conflicts**

The impacts of the various conflicts have always been negative. Some of the impacts include the following, among others.

- Lack of unity and trust and low motivation to work together to achieve the goals and aspirations of the community.
- Vicious cycle of poverty.
- Slow pace of development in the community.
- Loss of opportunity as the case with Gbole-Uba in 2013 scholarship slot
- Bloodshed and loss of innocent lives.

### **6.7.7 Community Socioeconomic Conditions**

Human development and human security are inseparable: whereas human development seeks to increase peoples' options, opportunities and access to public services and goods, and emphasizes what can be achieved, human security focuses on the risks, dangers, and threats to human development, evaluates the degree of confidence that people have in public services and goods, and emphasizes what can be lost when human potential is thwarted (Tadjbakhsh and Chenoy, 2007). Human development is measured by the Human Development Index (HDI). This index measures the average achievements in a country in three basic dimensions of human development: a long and healthy life, knowledge, and a decent standard of living.

#### **6.7.7.1 Evboiruebor Community**

Evboiruebor community was founded by Pa Iruebor and his nine followers. The community is in compartment 77, Area BC 10, Okomu Forest Reserve having Gbole-Uba, Umaligidi and Inikorogha as neighbouring communities. The community is a landlord since it shares part of its farmland with tenants living in Bisi, Hassan, Adeola and Akande camps.

**a.)Demography:** The present estimated population of Evboiruebor obtained from community sources is about 200 persons made up of 70 males and 130 females.

**b.) Social Composition**

Evboiruebor is 87.5% an indigenous community with the remaining 12.5% made up of people from other ethnic groups mainly Urhobo and Yoruba. It has two (2) churches which are Salvation Bible Church and Christ Eternal Life Bible Church. The community is made up of 90% Christians, and about 10% of African Traditional Religion devotees. There is only one local cemetery behind the village river as well as a sacred land called Oguegion.

**c.) Social Amenities**

Evboiruebor is a rural settlement with no appreciable infrastructure except a borehole provided by OOPC in 2014 as reflected in Table 6.9. The key infrastructure lacking in the community are electricity, health centre, market, access road and telecommunication. The lack of these amenities have the community far from being a sustainable community according to SDG 11 which is 'Make cities and human settlements inclusive, safe, resilient and sustainable' ([http://en-wikipedia.org/wiki/sustainable\\_development\\_goals#cite\\_note-30](http://en-wikipedia.org/wiki/sustainable_development_goals#cite_note-30)).

**Table 6.9: Evboiruebor (Extension One) Community Social Projects-Infrastructures**

S/No.	Amenities/Projects	Source / Provider	Estimated beneficiaries	Date Completed	Status	Remarks
1	Borehole provision	OOPC	Entire community	2014	In use	
2	Skill acquisition	OOPC	Trainee	Since 2014	continue	1 person per year
3	Bursary	OOPC	Tertiary students	Since 2014		1 slot but being diverted

There is no functional formal or informal school in Evboiruebor. This has affected early child education in the community therefore, the attainment of qualitative education is costly and coupled with the incidence of poverty. Some parents do send their wards to relatives in nearby towns for them to have access to qualitative education. This discourages the attainment of Sustainable Development Goals (SDGs) especially SDG 4 that is, ensure inclusive and equitable quality education and promote lifelong learning opportunities for all.

The situation analysis of certain basic needs of the community populace relating to health is dismal because there is no access to qualitative healthcare. The people of the community travel long distance in search of drugs and medical treatments. Thus SDG 3 that is, ensure healthy lives and promote well-being for all at all ages, is non-existent in the community. Human waste is openly discharged into the bush so also is kitchen waste which is usually openly disposed at the backyard.

The community is also not disposed to the attainment of SDGs 6 and 7 that is, clean water and sanitation as well as affordable and clean energy respectively ([http://en.wikipedia.org/wiki/sustainable\\_development\\_goals](http://en.wikipedia.org/wiki/sustainable_development_goals)).

#### **d.) Livelihood and Natural Resource Use**

The traditional occupation of the people of Evboiruebor is farming, which is the mainstay of the economy and the largest employer of labour with almost 60% engagement. This means livelihood is practiced alongside with fishing (10% engagement), because there is a stream at the southern part of the community, and logging. Other gainful non-traditional economic activity includes trading.

The rich and well tapped natural resource is the fertile land being used predominantly for plantain production apart from arable food crops such as cassava.

#### **6.7.7.2 Gbole-Uba Community**

Gbole-Uba was founded by Efeke, the great son of Perezigha of Ikoko community at about 1280 AD. The community is an Ijaw autonomous community and headed by the Ama-okosuwei (the oldest man). The community has had about 53 Ama-okosuwei from Ekefe to the present Ayabowei who was installed on 23<sup>rd</sup> March 2014. The community exists with its sub-communities namely Eyituoyor camp, Oko-gbene and most recently Hassan, Bisi, Akande and Adeola camps. The founder of the community had a land oath with Ogolo (Bini) community.

**a.)Demography:** The present estimated population of Gbole-Uba obtained from community sources is about 2,000 persons made up of 1,000 males and 1,000 females.

#### **b.)Settlement Pattern and Housing**

The settlement is generally moderately slope, and susceptible to flood, water, and air pollution. Gbole-Uba has a combination of linear and nuclear settlement patterns with different types of housing pattern in the

community with complete thatched roof accounting for 40% of the total houses while the remaining are zinc roofed.

### c.) Social Composition

Gbole-Uba is 100% indigenous community of three quarters. It has three (3) churches which are Cherubim and Seraphim, Assemblies of God, and Redeemed Christian Church of God; and one (1) mosque. There are two (2) public cemeteries located in the North and South of the community. The community is made up of over 77.5% Christians, 7.5% Muslim, and less than 15% African Traditional Religion devotees. There are two (2) shrines namely Osobo for masquerade, and Amaye for Oro festival.

Gbole-Uba people speak Ijaw language and Pidgin English, respectively. The time of the day and various occasions such as wedding, burial etc reflects different greetings. The formal greeting of “Good Morning”, “Good Afternoon” and “Good Evening” translates to “Eseredor/Ebeidegha”, “Doo” and “Ebuburudegha” respectively while “Ebode” and “Miemo” or “Emekame” translate to “welcome” and “Thank you”.

### d.) Social Amenities

Gbole-Uba lacks social amenities provided by government or self-help except those provided by OOPC as shown in Table 6.10 below.

**Table 6.10: Gbole-Uba Community Social Projects-Infrastructures**

S/No.	Amenities/Projects	Source / Provider	Estimated Beneficiaries	Date Completed	Status	Remarks
1	Rehabilitation of road	OOPC	Entire community	2004	In use	Yearly
2	A block of 3 classrooms for the Primary School	OOPC	Pupils & Teachers	2015	In use	
3	Borehole provision	OOPC	Entire community	2015	In use	
4	Skill acquisition	OOPC	Trainees	Since 2014	continue	6 youths yearly
5	Bursary	OOPC	Tertiary students	Since 2014		2 slots yearly
6	Rural electrification	Self Help	Entire community	2006	In use	

**e.) Education**

There is only one functional primary school in Gbole-Uba, but government has failed to provide teachers to the school this has affected the attainment of qualitative education in the community. Therefore, Sustainable Development Goals (SDGs) especially SDG 4 that is, ensure inclusive and equitable quality education and promote lifelong learning opportunities for all is far from been met.

**f.) Health**

The situation analysis of certain basic needs of the community with respect to health is dismal and practically nonexistent because there is no access to qualitative healthcare. The people of the community travel long distance in search of drugs and medical treatments resulting in the patronage of quack patent medicine stores for self-medication; some settle for traditional herbs. The SDG3 which seeks to promote healthy lives and wellbeing for all ages, is nonexistent in the community.

**g.) Agriculture and Household Nutrition**

The farming systems in the community are principally traditional subsistence crop farming characterized by farm holdings of less than two (2) hectares per household. Cocoa is the main cash crop grown and engaged in by people of the community, and this is followed by Cassava. Other crops grown for commercial purpose are plantain and maize.

**h.) Livelihood and Natural Resource Use**

The traditional occupation of the people of Gbole-Uba is farming, which is the mainstay of the community's economy and the main employer of labour with almost 80% engagement. This is practiced alongside with fishing and other gainful non-traditional economic activities such as trading and artisans. Members of the community consider the soils fertile hence, land as the main natural resource is well utilized for cocoa production apart from arable food crops such as cassava. The threatened natural resource is the forest and its products such as game (bush meat), snail, mushroom, and honey due mainly to Okomu oil palm and rubber development. The community is endowed with a river called 'Black Water-Dirimobin' which is barely used for fishing and domestic water source.

### 6.7.7.3 Ofunama Community

Ofunama the headquarters of Egbema clan was formally called Ofiniama. The community is an Ijaw community with nine (9) quarters and headed by the Ama-okosuwei (the oldest man) and the present Ama-okosuwei is Pa Wutu Perese. The community exists with its six (6) sub-communities generally referred to as camps and their names and distance from Ofunama is summarized in the Table 6.11 below:

**Table 6.11: Ofunama Sub-Communities**

Name of the camp	Dominant tenants	Distance to Ofunama
Seiveinmor	Ijaw, Yoruba, Urhobo	3km
Ikobou (Ajikobou)	Yoruba	6km
Ugbo	Itsekiri, Urhobo	12km
Okwuba	Urhobo, Ukwuani	3km
Balogun zion	Ijaw	1km
Ojobou	Urhobo	4km

**a.) Demography:** The present estimated population of Ofunama obtained from community sources is about 25,000 persons made up of 10,000 males and 15,000 females. The population structure is skewed towards youth with 11,000 (44%) followed by children with 9,000 (36%) and the adult with only 5,000 (20%).

#### **b.) Settlement Pattern and Housing**

The community is a riverine community with a combination of linear and nuclear settlement patterns and different types of housing patterns. Virtually all the houses (99%) in the community are zinc roofed with a sizable number of block and cemented houses.

#### **c.) Social Composition**

Ofunama is over 90% an indigenous community with the remaining 10% of members of the community coming from other ethnic origins across the country. It has thirteen (13) churches of various denominations. The community is made up of about 69% Christians, 1% Muslim and less than 30% African Traditional Religion adherents.

Ofunama people speak Ijaw language and Pidgin English respectively. The time of the day and various occasions such as wedding, burial etc attract different greetings. The formal greeting of “Good Morning”, “Good Afternoon” and “Good Evening” translates to “Eseredor/Ebeidegha”,



“Doo” and “Ebuburudegha” respectively while “Ebode” and “Miemo” or “Emekame” translate to “welcome” and “Thank you”.

#### d.) Social Amenities

Ofunama has a fair share of social amenities provided by both the external and internal stakeholders (government, OOPC, community etc.) as shown in Table 6.12 below.

**Table 6.12: Ofunama Community Social Projects-Infrastructures**

S/No.	Amenities/Projects	Source / Provider	Estimated Beneficiaries	Date Completed	Status	Remarks
1	Community Town Hall with furnishing	OOPC	Entire community	2013	In use	
2	Egbema Primary School	Baptist mission	Pupils & Teachers	1928	In use	
3	Sanitary pavilion in the primary school	OOPC	Pupils & Teachers	2014	In use	
4	Skill acquisition	OOPC	Trainees	Since 2013	continuing	5 youths yearly
5	Bursary	OOPC	Tertiary students	Since 2012		2 slots yearly
6	Radio house	Self help	Entire community	2005	In use	
7	Secondary school	Edo State	The community, Students & Teachers	1979	In use	
8	Supply of Textbooks and Science equipment in Primary & Secondary Schools	OOPC	The community, Pupils, Students & Teachers	2013	In use	All students received the textbooks
9	Boreholes in both Primary & Secondary schools	OOPC	Pupils, Students & Teachers	2013/14	In use	
10	Sanitary pavilion in Secondary school	OOPC	Students & Teachers	2014	In use	
11	Perimeter fencing in the Secondary school	OOPC	Students & Teachers	2015	On-going	
12	24 market stalls	OOPC	Women & traders	2014	In use	
13	Health centre	OSWLGA	Entire community	1992	In use	Need medical personnel and drugs
14	Rural electrification	OSWLGA	Entire community	1992/93	Broken down since 2002	
15	1000kva generator	DESOPAD EC	Entire community	2014	Not Functioning	
16	Solar powered boreholes-4nos	NDDC	Entire community	2008	Not effective	
17	Floating filling station	NNPC	Entire community	Started in 2010	Abandoned	
18	Communication (GSM) Mast	Globacom	Entire community		Not completed	
19	Guest house	OOPC	Entire community	Started in 2016	On-going	



**Plate 6.1: Stakeholders During SIA in Ofunama**      **Plate 6.2: Ofunama Town Hall Built and Furnished by Okomu OPC**

#### **e.) Education**

There are functional public primary and secondary schools in Ofunama provided by missions and government thereby promoting attainment of qualitative education. Therefore, Sustainable Development Goals (SDGs) especially SDG 4 that is, ensure inclusive and equitable quality education and promote lifelong learning opportunities for all, ([http://en.wikipedia.org/wiki/sustainable\\_development\\_goals#cite\\_note-23](http://en.wikipedia.org/wiki/sustainable_development_goals#cite_note-23)) is being achieved in the community. There is yearly skills acquisition organized and promoted by the OOPC for 5 youths of the community as well as bursary for tertiary students. The assessment of education and learning opportunities in Ofunama is summarized in Table 6.13 below.

**Table 6.13: Summary of Education Issues.**

<b>Issue</b>	<b>Subject</b>	<b>Objective Analysis</b>
Education	- Level of education	Medium
	- Quality of education	Low due to absence of qualified teachers
	- Skills building programme	Good

**f.) Health**

There is a functional health centre in the community promoting access to qualitative health care. SDG 3 that is, ensure healthy lives and promote well-being for all at all ages is gradually being met in the community. Community has access to portable water provided by many stakeholders including a borehole provided by OOPC. The other health related issues are summarized in Table 6.14 below.

**Table 6.14: Ofunama Health and Related Issues**

Issue	Subject	Objective Analysis
Health	• Level of health	Average
	• Access to clean water	Good
	• Access to latrine	Fair
	• Hygiene behavior	Fair

**g.) Agriculture and Household Nutrition**

The farming systems in the community are traditional subsistence crop farming characterized by small-sized holdings less than one hectare per household. Oil Palm is the main cash crop grown by the community; Cassava is the staple food crop cultivated. Other crops grown for commercial purpose are plantain and Cocoa.

**h.) Livelihood and Natural Resource Use**

The traditional occupation of the people of Ofunama is farming, which is the mainstay of the community's economy and the largest employer of labour with almost 70% engagement. Logging is the next to farming with 10% engagement and closely followed by fishing. These means of livelihoods are practiced alongside other gainful non-traditional economic activities such as trading, civil service, fashion designing, and artisans.

The rich and well tapped natural resource is the fertile land being used predominantly for oil palm production apart from arable food crops such as cassava. The rich but not fully exploited natural resource is crude oil with four (4) oil wells discovered by SPDC, but not presently operating.

#### 6.7.7.4 Opuama Community

The community is an Ijaw autonomous community and headed by the Ama-okosuwei (the oldest man) and the present Ama-okosuwei is Pa Paul Ndimi. The community has three (3) quarters namely Ijaw, Yoruba and Urhobo. The Yoruba quarter came to existence after the Extension One establishment by OOPC.

**a.) Demography:** The present estimated population of Opuama obtained from community sources is about 400 persons made up of 230 males and 170 females. The children are more than youth and adult with a population 220 (55%), followed by 120 (30%) youths and the rest 60 (15%) are adult.

**b.) Settlement Pattern and Housing**

The settlement is a generally moderate slope susceptible to flood, water and air pollution. Opuama has a nuclear settlement pattern with different types of housing pattern with thatched roof accounting for 67% of the total houses while the remaining are zinc roofed.

**c.) Social Composition**

Opuama is over 60% an indigenous community with the remaining 40% composed of the Yoruba and Urhobo quarters. The community is made up of over 80% Christians and 20% Muslim but has no church or mosque structures.

**d.) Social Amenities**

Opuama has no social amenities provided by government or other stakeholders except those provided by OOPC as shown in Table 6.15 below.

**Table 6.15: Opuama Community Social Projects-Infrastructures**

S/Nos.	Amenities/Projects	Source / Provider	Estimated beneficiaries	Date Completed	Status	Remarks
1	Borehole	OOPC	Entire community	2014	In use	
2	Skill acquisition	OOPC	Trainees	Since 2013	continue	8 youths yearly
3	Bursary award	OOPC	Tertiary students	2013 to date		6 slots yearly
3	Sanitary pavilion	OOPC	Entire community	2014	In use	

**e.) Education**

There is no functional formal or informal school in Opuama community. Therefore, attainment of qualitative education is costly, coupled with high poverty incidence. Some parents do send their wards to relatives in nearby towns to enable them to have access to formal education. This discourages to attaining the Sustainable Development Goals (SDGs) especially SDG 4 that is, ensure inclusive and equitable quality education and promote lifelong learning opportunities for all. ([http://en.wikipedia.org/wiki/sustainable\\_development\\_goals#cite\\_note-23](http://en.wikipedia.org/wiki/sustainable_development_goals#cite_note-23)). There is yearly slot for skill acquisition programme for community youths by OOPC as well as bursary for tertiary students.

**f.) Health**

The situation analysis of certain basic needs of the community populace relating to health and well-being is dismal because there is no access to qualitative healthcare in the community. The people of the community travel long distances in search of drugs and medical treatments. The attainment of SDG 3 that is, ensures healthy lives and promote well-being for all at all ages, is threatened in the community. Nitrite conditions are worsened by open defecation in the bush while household waste is poorly openly disposed.

**g.) Livelihood and Natural Resource Use**

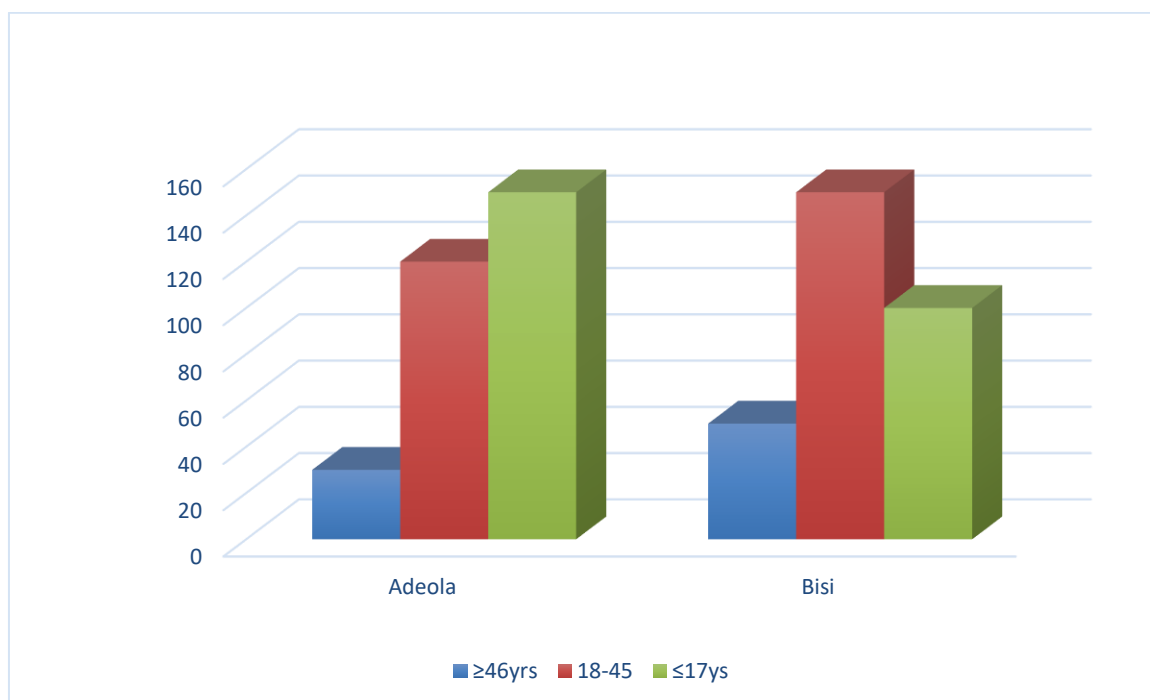
The traditional occupation of the people of Opuama is farming, which is the mainstay of the economy and the largest employer of labour with almost 70% engagement. This means of livelihood is practiced alongside fishing (20% engagement), because there are three rivers around the community namely Kokodiagbene, Omokoro and Black water which links to Ovia river. Other gainful economic activities include logging and trading. The rich and well tapped natural resource is the fertile land being used predominantly for plantain production apart from arable food crops such as cassava.

### 6.7.7.5 Camps

There are two (2) camps among the six communities assessed at Extension One of Okomu OPC with similar social characteristics. These camps were founded between 1989 and 2013 by migrants mostly from Osun State. Table 6.16 below shows key variables of these camps.

**Table 6.16: Key Variables of the Camps**

S/No.	Camp	Founder & Date	Landlord	Population			Religions		
				≥46yrs	18-45	≤17ys	Christian	Muslim	ATR
1.	Adeola	Resettlement for - Olomu camp (2013)	Gbole-Uba	30	120	150	83%	17%	0
2.	Bisi	Bisi	Gbole-Uba/ Evboirubor	50	150	100	70%	30%	0



**Figure 11: Population Stratification of Adeola and Bisi Camps**

**a.) Demography**

The population of most of the camps is skewed toward youth (18-45years) because farming (the principal livelihood of the camps) requires energetic population and surprisingly Cocoa instead of oil palm is the major crop cultivated, as these migrant population are from the traditional cocoa growing state of Osun State, and it may be assumed that they are already used to cocoa cultivation.

**b.) Settlement Pattern and Housing**

The settlement that Ajebamidele has like other camps is generally gentle slope susceptible to flood, water and pollution. Ajebamidele has a linear settlement pattern with different types of housing pattern in the community with complete thatched roof account for 2% of the total houses while the remaining are zinc roofed.

**c.) Social Composition**

All people in the camps speak Yoruba language and Pidgin English. The time of day and different occasions such as wedding, burial etc. attract different greetings. The formal greetings of Good Morning, Good Afternoon and Good Evening translate to “Ekaaro, Ekaasan and Ekaale” respectively while “Ekaabo” and “Eseun” translate to Welcome and Thank you.

**d.) Social Amenities**

There is no single social amenity in virtually in all the camps. The population of children in the camps is low because school age children are sent to their towns of origin to attend school because there is no formal school in all the camps. This threatens the attainment of Sustainable Development Goals (SDGs) especially SDG 4 that is, ensures inclusive and equitable quality education and promotes lifelong learning opportunities for all.

**e.) Agriculture and Household Nutrition**

The farming systems in the camps are principally traditional subsistence crop farming. They are characterized by small-sized farm holdings of less than one hectare per household. Cocoa is the main cash crop grown by all and is followed by kolanut in some camps. Other crops grown for domestic purpose are plantain and cassava.

**f.) Livelihood and Natural resource use**

The traditional occupation of the people is farming like other camps, which is the mainstay of the economy and the largest employer of labour. Occupational activities which farming provides engage between 80-95%

persons in the assessed camps. This means of livelihood is practiced alongside other gainful non-traditional economic activity such as trading.

The rich and well tapped natural resource is fertile land being used predominantly for cocoa and kolanut production apart from arable food crops such as cassava. Most members are share-croppers renting land from absentee landlords.

#### 6.7.8 Social Impact Assessment (SIA) Results

The results of the identification of social issues through participatory processes with stakeholders indicated that there are at least four (4) issues in the context of local residents and three (3) social risks that are of concern and can possibly have an impact on the corporate social responsibility of OOPC. In addition, there are three (3) conditions that are inherent in nature. Conditions that are defined as inherent are pre-existing conditions that happen, not in relation to the company's presence; but have an impact on the community. These issues are presented in Table 6.17 and Table 6.18 below.

**Table 6.17: Social Issues Identified Through the Participatory Processes**

S/No.	Category	S/N	Social Issues	Remarks
1.	The presence and corporate awareness of OOPC	1	OOPC either directly or through their CLOs have a well-established communication with the local government and local communities.	This is line with RSPO criterion 6.2 which OOPC effectively upholding
		2	OOPC CLOs have met the communities many times as part of their awareness campaign to inform communities of the plan for Extension One oil palm plantation expansion in the area	
2.	Changes in land use by the allocation of the land for oil palm and rubber plantations	3	All this while, Communities / camps land in Extension One has been used for cocoa and plantain production as well as local timber sources for the firewood and light construction. Hence, planting of oil palm and rubber on this land further deplete these cash crops/natural resources.	
3.	The role and contribution of the company to the local development	4	Local people have benefited from the Corporate Social Responsibility of OOPC in no small measure whether human capital development as well as infrastructural projects to certain extent. This includes yearly grading of untarred roads, sanitary pavilions, market stalls and blocks of classrooms as well as skill acquisition for youths, textbooks for pupils and students and bursary for tertiary students	Even without formal SIA, OOPC has not violated RSPO criterion 6.1



**Table 6.18: Social Risks and Local Given Situation to Extension One**

S/No.	Category		Issues	Remarks
	Social risks	1	There is still no agreement among communities on the issue of inter-community boundary causing some camps/tenants paying homage to two communities especially Bisi and Adeola camps.	
		2	Part of the land within the location permit has already been established with cocoa and food crop farmland.	
		3	Customary ceremonies are still being practiced during time of birth ritual, marriage ritual and death ritual though the essence is not as strong as before.	
	Given issues	1	Generally, some communities still use rivers for bathing, washing and waste disposal. Another common source of water is rainwater and few boreholes especially in landlord communities.	

## **6.8 Summary of SIA and Conclusion**

Based on the findings, the operation of Extension One estate shows generally positive social consequences mostly in the assessed communities. However, there are considerable adverse social impacts enumerated by community stakeholders and perceived by the study team, which require urgent attention and mitigation measures in order for Okomu Oil Palm Company Plc to achieve continuous social and harmony with the communities in Extension One area.

The following management and mitigation measures are proposed for adoption and implementation to address the significant potential social and environmental impacts to make Extension One operation socially acceptable and beneficial:

- Reduction of displacement of communities and people.
- Preservation of community farmlands.
- Water resources protection measures.
- Fire prevention programmes and zero or controlled burning.
- Corporate social services to communities should be intensified and be extended to camps.
- Public and occupational safety and health measures.
- Provision of healthcare services and HIV prevention.

Economic growth and prosperity are central to long-term poverty alleviation for social and environmental sustainability. The Okomu Oil Palm Company Plc's oil palm and rubber operations represent one of the most effective avenues for poverty alleviation in all the assessed communities and camps, provided adequate and prompt mitigation measures against experienced/envisaged adverse social impacts are implemented. Extension One plantation has been and also has the prospects of providing employment for thousands of unskilled and semi-skilled people, but this can only be achieved when Okomu Oil Palm Company Plc sustains the present social security already in existence in its area of operations.

## CHAPTER SEVEN

### 7.0 Summary of Audit Findings and Recommendation

Focal Area	Audit Area	Indicators	Status	Recommendation for Improvement
1. Environmental Sustainability Planning.	Institutional workplace environment policy	Institutional environmental sustainability policy	Environmental and/or any other policies duly signed by Managing Director are in place	Always operate according to the policies of the company.
	Structures to address environmental issues	Environmental committee in place	Environmental committee is in existence which cut across all departments.	No Action Required
	Strategic plan and Service Charter	Commitments	There are many charters developed by Socfin Group (Parent Company) such as Aid Charter.	Develop more charter to include special role for women in Host Community Development Agenda.
	Compliance with the Environmental Impact Assessment and Environmental Audit	Annual environmental audit reports EIA reports for new projects EMPs	The company has been in existence before the enactment of EIA Act of 1992. Annual environmental audit reports have been regularly submitted to both Federal Controller's office and Edo State Ministry of Environment and Sustainability in Benin City.	Develop a robust environmental management plan (EMP) covering all areas of company's operations.
	Housekeeping and Sanitation	Health, Safety and Environment (HSE) department in place	Housekeeping is fairly good at workplaces and has also improved at labour line quarters but poor at rubber estate.	<ul style="list-style-type: none"> <li>- Items should be arranged properly at labour line quarters and rubber estate quarters.</li> <li>- Emphasize good housekeeping and sanitation during monthly sanitation exercise.</li> </ul>
2. Pollution Control	Water Pollution & Control Measures	Initiatives to prevent, protect and monitor water sources.	The results of laboratory analysis show the groundwater quality is good but acidic with pH ranges from 4.94 and 5.89-5.61 for borehole and surface water respectively, thus making the water to be acidic, which is below the FMEnv and WHO (2004) drinking water guideline of pH 6.5-8.5.	The pH of borehole water should be raised to acceptable standards for drinking water quality (6.5-8.5) as recommended by WHO/FMEnv. Sustain the quarterly water quality monitoring on the estate.

	Waste management Interventions	Initiatives to segregate, reducing, reusing, and recycling of waste	Most waste generated on the estate is organic in nature which is recycled in the field. Sorting is done at the point of waste generation and at the solid waste dumpsite.	Always ensure that the solid waste dumpsite is under lock at all time.
		Modes of waste handling (generation, transportation, and disposal)	Solid waste generated are collected in colour coded bins and transported by bucket mounted tractor to solid waste dumpsite.	The Waste Manifest should be up to date.
	Air pollution control measures	Initiatives to reduce Air pollution	Aside the fact that the air quality is being carried out at critical work areas on quarterly basis, the ambient air quality was also determined in-situ for critical locations during the assessment and the result shows that the concentrations of gases and particulate matter monitored were within the FMEv. Limit.	Sustain the quarterly air quality monitoring on the estate.
	Noise Pollution Control	Initiatives to reduce Noise Pollution	Maintenance is regularly done on all the machinery.	Carry out a periodic noise measurement on all noise generating equipment before and after maintenance.
3. Climate Change	Climate change adaptation and mitigation	Energy saving initiatives	A plan to save energy is yet to be put in place.	Historical trend of energy consumption will seem to have been established as indicated in the drop in energy consumption over the last 3 years. Ensure continuous improvement.
		Rainwater harvesting	Conservation plot and sediment trap pits serve this purpose as a water retention medium	No Action Required
		Measures to control Greenhouse Gases	The mature palm trees serve as carbon sequential on the estate considering the vast mass of the estate.	No Action Required

4. Promoting Environmental protection and conservation through partnerships with stakeholders	Environmental projects and activities undertaken through partnership with stakeholders	Projects and activities undertaken jointly, MoUs Joint Management Plans	The estate has yet to participate in any environmental project and activities through partnership with any stakeholders except CSR to Host Communities.	It is desirable to develop a MoU with the host communities.
	Corporate social responsibility (CSR) on environment	CSR initiatives in place	CSR is done based on host community request every year where social commitments and obligations to the host communities are done.	No Action Required
	Partnerships with FMEnv on Monitoring and inspections to ensure compliance with environment legislation	Areas of partnerships with FMEnv on Monitoring and inspections to ensure compliance with environment legislation	There is a partnership with FMEnv and Edo State Ministry of Environment and Sustainability in environmental compliance monitoring.  A quarterly environmental monitoring exercise is carried out and report submitted to both Federal and Edo State Ministry of Environment and Sustainability.	This practice should be sustained
5. Environmental Ecological Enhancement	Wetlands, Riverbanks, lakeshores, and seashore management	Rehabilitation initiatives	No wetland and surface river are planted.	This practice should be sustained
	Conservation of biological diversity and Environmental significant areas	Conservation initiatives	Conservation Area (about 414.82 hectares) has been established within the plantation field.  The company security apparatus in conjunction with an HSE officer designate protect the conservation areas against internal and external threats.	This practice should be sustained
	Environmental restoration	Degraded lands secured, restored and conserved	No degraded lands on the estate	No Action Required

6. Education and Awareness	Behaviour Change towards the environment	Proof of positive behaviour change	Workers are aware of their environmental responsibilities.	Conduct regular training on HSE for workers.
	Participation in environmental events with communities and schools	Evidence of Participation in environmental events	None	Sustain the annual Health, Safety and Environment (HSE) week or day to create awareness among workers.
	Sensitization of staff and public on Environmental sustainability relevant to the institutional mandate.	Sensitized staff on environmental sustainability through Informative, Educative, and Communication (IEC) materials	There are many Informative, Educative, and Communication (IEC) Material on site.	Prepare more environmental signage and posters at critical work areas to sensitize workers on environmental protection as a collective responsibility.
	Recognition of environmental champions	Evidence of appreciation of environmental sustainability champions	Co-sponsoring many environmental activities in the state especially the World Environment Day.	Always partner and associate with bodies concern with environmental related issues such as workshop, symposium, and conference.

## **7.1 Compliance with Legislation**

### ***7.1.1 HSE Department***

A full fledged HSE department has been established. The department is to plan, manage, oversee, and supervise environmental activities on the estate. It is therefore recommended that HSE department personnel be regularly trained.

### ***7.1.2 Submission of Records and Reports to Regulatory Bodies***

The company has been submitting most of the reports and information such as environmental compliance monitoring reports (ECM) to the appropriate regulatory bodies particularly Federal Ministry of Environment and Edo State Ministry of Environment and Sustainability. The regulatory bodies require them for monitoring and review purposes, although, most of these reports and information are available on record for internal use and references. It is therefore recommended that all reports, data, lists, and log sheets relating to the environment be submitted to the Federal and State Ministries of Environment and other relevant regulatory bodies, and every submission be duly acknowledged, and copies filed appropriately.

### ***7.1.3 Environmental and Other Policies***

The company has developed a well written environmental and other policies. It is recommended that the company abides with the contents of the policy in its operations at all time.

### ***7.1.4 Permits/Licenses/Approvals***

Most permits, certificates and licenses have been obtained but their validity will soon expire. It is recommended that, all statutory documents be revalidated.

## **7.2 Environment**

### ***7.2.1 General Housekeeping and Sanitation***

Housekeeping is fairly good across board on the estate. It is recommended to:

- ❖ Intensify good housekeeping among dwellers of the estate.
- ❖ Introduce measures to make the residents comply with any guidelines in place to making the environment look decent.

### ***7.2.2 Solid Waste Dumpsite***

The operation of the present solid waste dumpsite at Main estate looks good. It is recommended that the solid waste dumpsite be subjected to a periodic assessment to monitor possible contamination of groundwater and air quality.

## **7.3 Pollution**

Considerable provisions have been made to prevent pollution particularly noise pollution at the powerhouse. It is recommended that additional provisions be made to prevent and abate the effect of pollution at other critical workplaces such as the chemical mixing area.

### ***7.3.1 Drinking Water Quality***

The quality of water supplied from the boreholes except for the pH is good. It is however recommended that the pH is raised to potable water standard of 6.5-8.5 by adding soda lime.

### ***7.3.2 Ambient Air Quality***

The in-situ determination of the gases showed that, all gaseous emissions including Suspended Particulate Matters (SPM) were within the FMENV set limits. However, it is recommended that workers inside the powerhouse, agrochemical stores, agrochemical sprayers and other critical work areas always use appropriate PPE especially the Nose Mask/Respirator.

### ***7.3.3 Noise Level Measurements***

The noise levels at different locations to the powerhouse and other critical workplaces range from 33.6 dB(A) – 68.3 dB(A). These noise levels are within permissible limits of 90 dB(A) for 8-hours exposure.

### ***7.3.4 Energy***

It is important to always monitor the energy consumption and ensure that energy consumption is efficient in relation to the size of operation. It is recommended to monitor the energy consumption trend on a regular basis and set targets aimed at achieving the most efficient energy use rate in case of any unacceptable trend.

## **7.4 Emergency Response/Contingency Plans**

Emergency Response and Contingency Plans have been written for most operations. It is recommended that all staff is aware and trained on all emergency response and contingency to make it effective.



## **7.5 Health**

### ***7.5.1 First Aid Arrangement***

First Aid Boxes are provided at offices. The First Aid Boxes should be reasonably and regularly stocked. The procedure for First Aid treatment should be established and documented and all the necessary training and awareness is created.

## **7.6 Workplace Safety**

### ***7.6.1 Safety Organization***

There can still be more improvement and effectiveness in the existing safety organization. This can be achieved by getting feedback from workers on safety issues. It is recommended that decisions, actions, and feedback on emergent safety issues be documented and reviewed.

### ***7.6.2 Occupational Accidents and Dangerous Occurrences***

It is important to always report dangerous occurrences such as near-misses so that incidents and accidents can be mitigated. It is recommended that all dangerous occurrences, incidents, and accidents be reported, and the findings of investigation be utilized in proffering solutions to avoid reoccurrence.

### ***7.6.3 Personal Protective Equipment***

The provisions for the enforcement of the use of PPE by workers are good and should be sustained. It is recommended that safety education be used in encouraging the use of PPE by workers and to also follow strictly work procedures.

## **7.7 Safety Data Sheets (SDSs)**

It is recommended to obtain SDSs for all hazardous chemicals in use and train workers on its content.

## **7.8 Fire Prevention and Control**

It is recommended that the present fire prevention and control measures in place be sustained.

## **7.9 Risks/Hazards Analysis**

A comprehensive risk assessment and analysis of tasks and jobs have been done. However, the analysis should be reviewed regularly. It is also recommended to ensure that all response/control measures are very well established and functional.

### **7.10 Training, Communication and Reporting**

The existing training and education arrangement appears good (*see Appendix E*). It is recommended to establish an in-house training structure with documented curriculum that can be reviewed regularly, and this should cut across most workplaces.

### **7.11 Signage**

There is quite several signage on the estate especially on major roads. It is recommended workers are educated on the importance of signage especially the message, interpretation, and compliance.

### **7.12 Welfare**

The following recommendations are made on workers welfare:

- Provide PPE for all workers.
- Make PPE a condition of work — No PPE, No work
- Repair all damaged septic tanks across board.

### **7.13 Industrial Labour Relations**

The industrial labour relations of the company are good and it is recommended to improve on it. Although harmful child labour is non-existence and there is a policy forbidden use of child labour on the estate but there is the prospect of child abuse in plantation work when children accompany their parents to work. It is therefore recommended to strictly apply the policy on harmful child labour.

### **7.14 Corporate Social Responsibility**

The CSR of the company would seem to be good and should be sustained. It is recommended that gender development especially for women be always included in the development agenda for host communities.

## CHAPTER EIGHT

### 8.0

#### Follow-Up Environmental Action Plans (EAPs) – 2021

ISSUE/RECOMMENDATION	PRIORITY	FORMER TARGET	REMARKS	
			STATUS	NEW TARGET
<b>Compliance with Legislation</b>				
Submit all records relating to environment to Regulatory Bodies.	High	Continuous	On-going	Continuous
Release Company's HSE manual.	High	March 2019	Not Done	March 2022
Review and update status of Permits, Certificates, Licenses, etc.	High	Continuous	On-going	Regularly
<b>Waste Management System</b>				
Ensure that there is no mix-up of hazardous and/or empty agrochemical containers with general/domestic waste when transporting wastes to the Main estate	High			On-going
Replace all damaged waste storage bins across board.	High	Continuously	On-going	Continuously
<b>Pollution</b>				
Repair all damaged septic tanks across board	High	Sept 2018	On-going	Continuously
<b>Work Procedure</b>				
Display work procedure for every job and task.	Medium	June 2018	Not Done	June 2021
Enforce the use of seat belts by drivers both on and outside the estate.	High	June 2018	On-going	Always
<b>Health</b>				
Establish and document procedure for First Aid treatment.	High	July 2018	On-going	December 2021

**Follow-Up Environmental Action Plans (EAPs) - Cont'd**

ISSUE/RECOMMENDATION	PRIORITY	FORMER TARGET	REMARKS	
			STATUS	NEW TARGET
<b>Workplace Safety</b>				
Safety education be included in encouraging the use of PPE by workers.	High	On-going		On-going
Provide maintenance ladder and safety provisions for communication masts.	High	December 2018	On-going	Always
Prepare HSE manual to guide workers on health and safety.	High	July 2015	Not Done	March 2022
<b>Energy</b>				
Set target to achieve efficient energy use.	Medium	January 2019	Continuous	December 2021
Establish energy conservation policy for all workplaces	Medium	December 2018	On-going	December 2021
<b>Plantation Management</b>				
Periodically evaluate plantation water consumption rate	High			Periodically
<b>Housekeeping and Sanitation</b>				
Eliminate all unauthorized refuse dumps at workplaces and residences.	High	On-going	On-going	Continuously
Remove all unauthorized attachments to buildings.	High	Sept 2018	On-going	Continuously
Prepare Emergency Response/Contingency Plan for damaged septic tanks.	High	Sept 2018	Not Done	September 2021
Arrange properly items including drums at the powerhouse.	High	Continuous	On-going	Continuously
Abolish the practice of hanging unused clothes (rags) around the quarters' building.	Medium			September 2021
Discourage the use of general kitchen as store at Extension I.	Medium			September 2021

**Follow-Up Environmental Action Plans (EAPs) - Cont'd**

ISSUE/RECOMMENDATION	PRIORITY	FORMER TARGET	REMARKS	
			STATUS	NEW TARGET
<b>Training Communication and Reporting</b>				
Establish and document curriculum for formal training.	Medium	December 2018	On-going	July 2022
Run induction courses to cover fire safety, First Aid and Environmental Policy.	Medium	Continuous	On-going	Immediately
<b>Signage</b>				
Produce more signage and educate workers on understanding and compliance.	High			July 2021
Produce and display safety education, instruction, and warning signage at workplaces.	High			September 2021
Constantly maintain all the muster points and should be devoid of any obstruction	High			Continuously
<b>Community Development</b>				
Ensure records are maintained on all communications with the public, especially local communities.	High			Always
<b>Industrial Labour Relation</b>				
Forbid workers from taking underage children to help them in plantation work.	High	Immediately	On-going	Continuously

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**Annexure I –Terms of Reference (ToR)**

## **OBJECTIVES OF ENVIRONMENTAL AUDIT**

The main objective of the EAu is to principally assess the extent to which an organization is observing practices which minimize harm to the environment. Environmental auditing is carried out when a development is already in place, and is used to check on existing practices, assessing the environmental effects of current activities. Environmental auditing therefore provides a 'snap-shot' of looking at what is happening at that point in time in an organization. The environmental audit covers the whole environment from the biotic to abiotic (physical), socio-economic and health and safety aspects of the workers and the proximal communities. In this circumstance therefore, and for the purposes of compliance with Federal Environmental Laws, it is required that Okomu OPC Plc as a responsible corporate organization conduct an Environmental Audit on its facilities and operations. This would serve to adequately analyze the site, investigate, understand, and identify effects of certain activities on the environment against set criteria or standards. These are used to help improve existing human activities, with the aim of reducing the adverse effects of these activities on the environment.

## **PROJECT JUSTIFICATION**

In Nigeria, the legal instruments relevant for the protection of the environment are contained in FEPA (now Federal Ministry of Environment) regulations. Some State governments also made few enactments that are not inconsistent with the Federal laws. In consonance with these laws, Okomu OPC Plc should:

- Develop, Implement, and maintain an environmental policy that would enhance the environmental performance of its corporate activities.
- Aim and pursue compliance with existing environmental legislations, identify any non-compliance and endeavour to remedy such non-compliance.
- Develop and maintain environmental awareness of its employees, contractors and any such external parties involved in their corporate activities.
- Improve its corporate image through environmental responsibilities, particularly amongst the host communities.
- Work in partnership with regulatory agencies for better environment.
- Pay special attention to sustainable development through incorporation of environmental concerns into any development projects.
- Maintain good relationship with the neighboring communities of their projects for better performance.
- Minimize litigation that may arise from environmental non-performance of their projects' activities.



## **WORK SCOPE**

We have very good knowledge and understanding of the requirements of an EAu and have identified the following broad and specific elements for the plantation estate.

1. **Description of the Facility**  
Detailed regular and description of the facility to include activities and operations. Also detailed information concerning the use of inputs, localization, by-products, products, wastes etc.
2. **Legislation**
  - Describe the primary environmental legislative requirement for the facility operations, construction activities and protection measures.
  - List all references to legislation.
  - Identify development legislation, which is likely to affect the operation of the project.
3. **Background Information**
  - Identify source for the main legal requirements that affect the operation of the facility or processes.
  - Prepare the layout of the unit operations.
  - Provide block or engineering diagram.
4. **Material Balance and Mass Balance Measurement**  
This will help to prioritize problem waste by:
  - i) Identifying, characterization and quantifying major sources of waste
  - ii) Identifying deviations from the norm in terms of waste production
  - iii) Identifying areas of unexplained losses and pinpoint operations which contribute to flows that exceed national or site discharge regulations; and
  - iv) Identifying, characterization and quantifying effects of wastes on the working and receiving environment
5. **Identification, Quantification and Characterization of Waste Impacts**  
This would assist to identify and quantify the audit process in order to determine the impacts of the waste and prioritize wastes which includes:
  - i.) Identification of unit operations
  - ii.) Identification of raw materials storage, values, and handling losses
  - iii.) Input data (e.g., Raw materials, water, energy)
  - iv.) Water usage by unit operation including amounts used for cleaning, steaming etc.)
6. **Impact Evaluation**  
This is the evaluation of facility impacts and shall be achieved through sampling of groundwater, surface water, soil, air, and noise measurements.

**7. Evaluation of Findings**

The evaluation of findings will be done against the national regulations and standards as specified by the Federal Ministry of Environment and best practices for annual crop production.

After gathering of information and data collection, the findings would be reviewed with the facility management.

**8. Recommendation**

- General Recommendation.
- Specific Recommendation

**9. Environmental Action Plan**

A robust environmental action plan will be produced to bring into effect the findings and recommendations of the environmental audit.

**10. Follow-up Action Plan**

- Environmental Management System (EMS)
- Waste Reduction
- Efficiency Improvement

**METHODOLOGY**

FDS would approach the audit as follows:

- **Pre-Audit/Reconnaissance Visit:** Visits to the plantation estate for familiarization and scoping of the audit process.
- **Scoping:** Identifying a number of critical issues from the broad range of current/present operations.
- **Facility Inspection:** Baseline environmental assessment study, including existing environmental management systems, environmental aspects, procedures, processes, permits, record, etc.
- **Identification of Impacts:** Identification, quantification, and characterization of waste.
- **Impact Evaluation:** Impact identification, impact quantification, public health impact and social impact including pollution, groundwater, surface water, noise, air, occupational health, and safety.
- **Recommendations:** General recommendations and Specific recommendations.
- **Environmental Action Plan:** Detailing activities, responsibilities, and timeline.

We intend to combine multi-disciplinary and interdisciplinary approaches to compose a study team covering the following expertise: Development Planning, Agricultural/Mechanical Engineering, Soil Science, Analytical/Environmental Chemistry, Forestry, Environmental Toxicology, Environmental Health and Safety and Environmental Law.

**Appendix A**  
**Laboratory Analysis Results of Borehole and**  
**Surface Water Samples**

## Analyst's Certificate

[Institute of Public Analysts of Nigeria Decree 100 of 1992]

**No: 008214**

<b>Name of Sample:</b>	Extension 1 Groundwater Sample	<b>Project:</b> OKOMU Extension 1 2020 Aud
<b>Client:</b>	Foremost Development Services Limited	
	For: Okomu OPC Plc, Okomu-Udo, Edo State.	
<b>Submission Date:</b>	23 December, 2020	<b>Lab No.:</b> EL/W/1812/31723

### Methodology:

Samples of water collected from all the sites were analyzed using Standard methods of water and wastewater analysis (APHA, 23<sup>rd</sup> edition) and HACH methods of analysis of water (12<sup>th</sup> edition). The parameters examined are as contained in the result Table.

### Sampling Locations

S/N	Code	Description of location	Coordinates	
1	OKMEXTQ	Extension One Quarters	N06°22' 22.2"	E005°22'53.2

### Result of Analysis.

The result of on-site measurements and laboratory analyses carried out on the water sample collected from Extension 1 Quarters while in the same condition as submitted to us is presented in Table 1:

### Comments

Based on the result of analysis conducted on the sample, the pH of the sample was below the limit. The aesthetic quality of the water was within the limit; no colour, no taste and the turbidity were 1 NTU.

The other physico-chemical and microbiological qualities of the water also conformed to the Standard.

**I, the undersigned Public Analyst, OYEDIRAN, L.O. (IPAN NO. 00155®), make this certification, as witnessed my hand this 28<sup>th</sup> day of December 2020.**

**FEMI OYEDIRAN**  
INSTITUTE OF PUBLIC ANALYSTS OF NIG.  
(ESTABLISHED BY DECREE NO. 100 OF 1992)  
PRACTICE/REG. NO. 00155

TABLE 1: GROUNDWATER SAMPLE

Ex.: OKOMU Oil PLC (Extension 1)

PARAMETER/UNIT	NIS554: 2015	Result
Appearance	Clear & colourless	Clear & colourless liquid
pH @25.6 °C	6.5-8.5	4.94
Temperature, °C	Ambient	27.0
Conductivity, µS/cm	1000	41.6
Colour, Pt-Co	15	1
Turbidity, NTU	5	1
Total Solids, mg/L	-	24.9
Total Dissolved solids, mg/L	500	20.9
Total Suspended Solids, mg/L	-	4
Total Hardness, mg/L	150	2
Total Alkalinity, mg/L	-	7.7
Total acidity, mg/L	-	19.1
Calcium, mg/L	-	<1
Magnesium, mg/L	20	0.49
Chloride, mg/L	250	7.3
Nitrate, mg/L	50	0.3
Nitrite, mg/L	0.2	<0.001
Sulphate, mg/L	100	9
Phosphate, mg/L	-	<0.1
Free carbon dioxide, mg/L	-	16.84
Iron (total), mg/L	0.3	<0.01
Fluoride, mg/L	1.5	<0.1
Lead, mg/L	0.01	<0.001
Arsenic, mg/L	0.01	<0.001
Manganese, mg/L	0.2	<0.001
Copper, mg/L	1.0	<0.001
Cadmium, mg/L	0.03	<0.001
Chromium, mg/L	0.05	<0.001
Hydrogen Sulphide, mg/L	0.05	<0.01
Total coliform count, CFU/mL	10	Nil
Faecal coliform (E. coli), CFU/100 mL	Nil	Nil
<i>Clostridium perfringens</i> , CFU/100 mL	Nil	Nil
<i>Salmonella/Shigella</i> sp., CFU/100 mL	Nil	Nil
<i>Staphylococcus</i> sp., CFU/100 mL	Nil	Nil
<i>Pseudomonas aureus</i> , CFU/100 mL	Nil	Nil
Total plate count, CFU/100 mL	10 <sup>2</sup>	4

## Analyst's Certificate

**N:008415**

[Institute of Public Analysts of Nigeria Decree 100 of 1992]

<b>Name of Sample:</b>	Surface Water Samples	<b>Project:</b>	Extension 1 2020 Audit
<b>Client:</b>	Foremost Development Services Limited		
	For: Oomu OPC Plc, Okomu-Udo, Edo State.		
<b>Submission date:</b>	23 December, 2020	<b>Lab No.:</b>	EL/W/1812/31719-20

### A. Methodology:

Samples of water collected from the site were analyzed using Standard methods of water and wastewater analysis (APHA, 23<sup>rd</sup> edition) and HACH methods of analysis of water (12<sup>th</sup> edition). The parameters examined are as contained in the result Table.

### B. Sampling Locations

S/N	Code	Description	Coordinate	
1	OKM <sub>ARKH1</sub>	Arakhuan Stream inlet	N06°21'06.2"	E005°21.34.8"
2	OKM <sub>ARKH3</sub>	Arakhuan Stream outlet	N06°18'23.0"	E005°22'08.0"

### C. Result of Analysis.

The result of on-site measurements and laboratory analyses carried out on the surface water sample collected from the company while in the same condition as submitted to us is presented in Table 1.

### D. Comments

The result of analysis conducted on the samples showed that the pH was below the limit. All other physico-chemical and microbiological qualities of the samples conformed to the Standard.

**I, the undersigned Public Analyst, OYEDIRAN, L.O. (IPAN NO. 00155®), make this certification, as witnessed my hand this 28<sup>th</sup> day of December 2020.**

**FEMI OYEDIRAN**  
INSTITUTE OF PUBLIC ANALYSIS OF NIG.  
(ESTABLISHED BY DECREE NO. 100 OF 1992)  
PRACTICE/ACCREDITATION No: 00155

Table 1: Result of analysis of surface water samples collected from Extension 1

PARAMETER/UNIT	METHOD APHA, 23 <sup>rd</sup> Edn.	OKM <sub>ARKH1</sub>	OKM <sub>ARKH3</sub>	FME <sub>Env.</sub>
Appearance	Visual	Clear	Clear	Clear & colourless
pH @ 28°C	Electrometric	5.61	5.89	6-9
Temperature, °C	Thermometer	26.0	26.1	Ambient
Conductivity, µS/cm	2510-B	26.1	20.6	2000
Colour, Pt-Co	2120-C	3	6	7.0
Turbidity, NTU	2130-B	<1	<1	10
Total Solids, mg/L	2540-B	13.4	10.3	-
Total Dissolved solids, mg/L	2540-C	13.4	10.3	1000
Total Suspended Solids, mg/L	2540-D	<1	<1	30
Total Hardness, mg/L	2340-C	10	2	-
Total Alkalinity, mg/L	2320-B	6.7	7.7	-
Total acidity, mg/L	2310-B	13.9	9.9	-
Calcium, mg/L as Ca	3500-B	1.2	0.80	-
Magnesium, mg/L as Mg	3500-B	1.7	<1	-
Salinity as Chloride, mg/L	4500-B	5.9	5.4	200
Nitrate, mg/L	4500-NO <sub>3</sub> -B	0.3	0.2	50
Nitrite, mg/L	4500-NO <sub>2</sub> -B	<0.01	<0.01	0.3
Sulphate, mg/L	4500-E	3	2	250
Phosphate, mg/L	4500-C	0.9	0.3	-
Iron (total), mg/L	3500-B	<0.01	0.02	20
Lead, mg/L	3500 -Pb-B	<0.01	<0.01	<1.0
Copper, mg/L	3500 -Cu-B	<0.01	<0.01	<1.0
Manganese, mg/L	3500 -Mn-B	<0.01	<0.01	0.10
Cadmium, mg/L	3500 -Cd-B	<0.001	<0.001	<1.0
Nickel, mg/L	3500 -Ni-B	<0.001	<0.001	<1.0
Cobalt, mg/L	3500 -Co-B	<0.001	<0.001	<1.0
Arsenic, mg/L	3500 -As-B	<0.001	<0.001	<1.0
Chemical Oxygen Demand, mg/L	5220-D	8	6	80
Biochem. Oxygen Demand, mg/L	5210-B	<1	<1	30
Dissolved Oxygen, mg/L	4500-G	8.4	7.2	>2.0
Total Hydrocarbon, mg/L	Spec.	<0.01	<0.01	
Pesticides, mg/L	Screening	<0.01	<0.01	
Total coliform count, MPN/mL	9225-D	16	20	10 <sup>2</sup>
Faecal coliform (E.coli), CFU/mL	9222-D	Nil	Nil	-
Total plate count, CFU/mL	9215-B	80	64	10 <sup>4</sup>



## **APPENDIX B**

### **Full Results and Methodology of Ambient Air Quality & Noise Measurements**



## Analyst's Certificate

[Institute of Public Analysts of Nigeria Decree 100 of 1992]

No: **181215**

Name of Project	Extension I Air Quality Monitoring
Client	Foremost Development Services Limited
Sampling Date	For: OKOMU OPC Plc, Okomu-Udo, Edo State. 23 December 2020 - (2020 Environmental Audit)

### Methodology and result

Sampling and measurement of ambient air quality and noise level were carried out using portable analyzers. Gaseous components of the air were monitored using Mattheson Model IQ 1000 Gas Analyzer to measure the concentration of carbon monoxide (CO), carbon dioxide (CO<sub>2</sub>), Sulphur dioxide (SO<sub>2</sub>), oxygen, hydrogen sulphide (H<sub>2</sub>S) and volatile organic compounds. Nitric oxide, NO<sub>x</sub>, was determined using BWT gas alert meter. Handheld Aerosol Monitor PPM1055 for the measurement of suspended particulate matter. Quest 2500 Sound Level Meter was used to measure the noise level within and around the facility.

The result of on-site measurements carried out on the ambient air at the facility is presented in Table 1:

Based on the result of measurements conducted around the facility:

- The concentrations of gases obtained were within the regulatory limits for each parameter.
- The particulate matter was within the recommended ambient limit at all the locations.
- The noise level at all the locations was also within the standard for 8-hour exposure.

I, the undersigned Public Analyst, **OYEDIRAN, L.O. (IPAN NO. 00155®)**, make this certification, as witnessed my hand this 25<sup>th</sup> day of December 2020.

**FEMI OYEDIRAN**  
INSTITUTE OF PUBLIC ANALYSTS OF NIG.  
(ESTABLISHED BY DECREE NO. 100 OF 1992)  
PRACTICE CERTIFICATE No: 00155

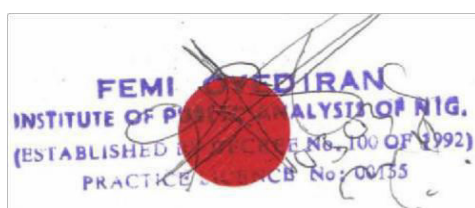
**Table 1: Result of Air Quality Measurement and Noise Level around Extension One**

Coordinate	<i>Extension One Powerhouse (500kVA)</i>	Field F61	Field D82	Field A53	FME <sub>env.</sub> Limit
	N06°22.457'	N06°21'01.8"	N06°19'41.7"	N06°20'42.3"	-
	E005°22.923'	E005°22'02.2"	E005°22'18.1"	E005°24'31.9"	-
Elevation, m	87	63	64	37	
Noise, dB(A)	79.2	27.2	33.4	33.3	90
SPM (µg/m <sup>3</sup> )	190	31	37	92	250
Humidity (%)	63.8	84.6	79.1	66.7	Ambient
Temperature (°C)	29.7	26.0	26.4	28.5	Ambient
Carbon monoxide, ppm	<1.0	<1.0	<1.0	<1.0	10-20
Carbon dioxide, %	0.38	0.31	0.27	0.33	Ambient
Hydrogen sulphide, ppm	<0.1	<0.1	<0.1	<0.1	-
Hydrocarbon, %	<0.1	<0.1	<0.1	<0.1	-
Oxygen, %	21.0	20.9	21.0	21.0	21.0
Sulphur dioxide, ppm	<0.01	<0.01	<0.01	<0.01	0.01
Nitrogen dioxide, ppm	<0.01	<0.01	<0.01	<0.01	0.04 – 0.06
VOC, ppm	<0.01	<0.01	<0.01	<0.01	

**VOC = Volatile Organic Compounds; SPM = Suspended Particulate Matter**

**NOISE LEVEL MEASUREMENT (EXTENSION ONE)**

Location	Noise level, dBA
Extension One Powerhouse (500kVA)	68.3
Nearest Residential block	55.2
Car washing bay	61.4
Pavilion 3	60.5
Field F61	38.4
Field D82	33.6
Field A53	39.9
<b>NESREA Standard (8-hour exposure)</b>	<b>90</b>



## **APPENDIX C**

### **Waste Management Plan (WMP) & Emergency Response/ Contingency Plan**

## **EMERGENCY RESPONSE/CONTINGENCY PLAN FOR FIRE, SECURITY THREATS, MEDICAL, CHEMICAL SPILL, AND ELECTRIC SHOCK**

### **1.0 Purpose/Scope**

This procedure defines the framework for preparing for and responding to emergencies involving fire, security threats, chemical spill, medical emergency and electric shock.

### **2.0 Workplace/Activities Affected**

All workplace and departments

### **3.0 Definitions**

3.1 Fire and Chemical spill are defined as materials which when released into the environment, or because of their properties and the way they are used, could cause harm to workers, from fires and explosions. Dangerous substances include petrol (PMS), liquefied natural gas (LPG), paints, chemicals and solvents.

3.2 Security threat is defined as any incident or confrontation that jeopardizes property and lives, which includes, but not limited to: militants and civil unrest.

3.3 Emergency Response-actions taken by personnel within the work area in an effort to mitigate the impact of an incident on the public and the environment.

3.4 TOC-Tactical Operations Centre: a communication Centre that coordinate all crisis activities.

3.5 Electric shock is defined as a sudden discharge of electricity through a part of the human body.

### **4.0 Exclusions**

None

### **5.0 Procedures**

In the circumstances:

#### **5.1 For fire and security threats:**

- The Person who has observed any danger must alert employees by sounding appropriate alarms. The alarm must be heard, seen or otherwise perceived by everyone in the workplace.
- The person must notify security/TOC on the emergency numbers posted in various locations in the work place, inform TOC of the situation fire/incident. If it's a fire, inform TOC of the location, injuries, potential fire hazards and risk (oil drums, paints, banga product, rubber, chemicals and gas bottles etc). TOC will brief fire service. If it is an incident, inform TOC of the type of incident, location description of suspect(s) type of weapon (if it involves a weapon) and any injuries at the scene.
- TOC will dispatch the appropriate authority to the scene, along with medical staff, if safe to do so, at the time.
- HSE representatives, will assist with evacuation of the worker(s) from the building.
- All workers must report to their muster point.
- HSE representatives will assist personnel with special needs or disabilities who may need help evacuating and assign one or more people, including backup personnel, to help them.
- Staff should ensure all windows and doors are closed, and all electrical appliances are switched off and unplugged before evacuating the building
- HSE representatives will do a head count to verify if anyone is missing, with the assistance of a contractor for their workers, if any are in that department.
- HSE representatives should ensure that no body returns to the factory/building until it is cleared by the appropriate authority.

#### **5.2 For chemical spill:**

##### **For small spill:**

- First person to observe a spill must use the appropriate spill kit to control the spill.

##### **For large spill:**

- The first person to observe the spill must contact their supervisor, who will notify HSE to dispatch the Spill Response team, to see a perimeter to contain the spill.
- The supervisor must notify TOC, for emergency assistance (if needed).
- HSE will notify The Federal Ministry of Environment.
- The Federal Ministry of Environment will assist in the disposal of waste and,
- Decontaminate the area and affected place.

#### **5.3 For medical emergency;**

- The person who has observed any emergency must notify TOC on the emergency numbers posted in various locations in the work place, inform TOC of the type of Emergency.
- TOC will notify and dispatch medical staff and ambulance to the scene.

#### **5.4 For electric shock;**

- First person to observe a shock situation should turn off the source of electricity, if possible, if not, notify the Estate department and contact TOC to dispatch the appropriate authority.
- Keep the shocked person warm, lying down, and still until the ambulance arrives.

### **6 Emergency numbers**


0813 463 1183 (TOC) – 24hrs

### **7 Record of Approval**

Task	Name/signature	Job title
Approved by	Graham Hefer	Managing Director






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Action	Name	Function	Date	Signature
<b>Prepared by</b>	Mikle George	HSE Manager		
<b>Verified by</b>	Mikle George	HSE Manager		
<b>Approved by</b>	Graham Hefer	Managing Director		

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## 1. INTRODUCTION

This procedure seeks to ensure the appropriate handling, storage and disposal of waste generated at OOPC. It is aimed at waste avoidance and minimization which are achieved with the following objectives:

- identification of the types and quantities of waste that would be generated and the areas in which waste will be stored prior to removal;
- standards and performance measures for dealing with this waste;

Based on federal, state and local regulations, waste is classified into three main categories:

- non-hazardous waste: does not pose any danger to humans and environment (e.g. household garbage);
- hazardous waste: waste of this type either contains leachable toxic components or has common hazardous properties such as reactivity or ignitability;
- Special waste: wastes of this type vary in their properties and are regulated with specific guidelines (example includes medical and radioactive wastes).

The bulk of waste generated by OOPC is organic waste which is non-hazardous in nature. Others include empty agrochemical containers, spent oil, used batteries (hazardous), glass, plastic, plantation polythene bags, mixed paper, and medical waste. 100% of solid waste generated by OOPC is disposed at the dump site with the exception of medical waste which is regarded as a special waste and thus handled separately.


### 1.1. WASTE STREAMS AT OOPC

#### 1.1.1 SOLID WASTE

This includes household waste (domestic waste) generated from OOPC residential areas. This waste is mostly non-hazardous in nature. Others include glasses, plastics, plantation polythene bags, mixed papers, and medical waste.

#### 1.1.2 HAZARDOUS SUBSTANCES

OOPC generates quantities of hazardous waste. Most of these wastes are generated by the plantation, workshop, estate department and quality control laboratories. Although the types of waste vary, the most common include empty agrochemical containers, spent oil, batteries containing lithium, nickel and sulphuric acid (H<sub>2</sub>SO<sub>4</sub>). Where there are expired agro-chemicals and laboratory chemicals, expert advice about their disposal must be from the relevant state and federal regulatory authorities, and/or companies that manufacture these items.

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#### 1.1.3 MEDICAL WASTE (SPECIAL WASTE)

These are wastes produced by the Clinic (needles, syringes and pathological waste). The clinic disposes these wastes by burning them inside the boiler at the oil mill.

#### 1.1.4 NON-SOLID WASTE

These include liquid and gaseous wastes that are produced from Oil mill, Rubber factory processes and septic tank waste.

## 2. SCOPE

This waste management plan describes how OOPC manages all its wastes and ensure compliance to necessary requirements of ISO and RSPO

## 3. ABBREVIATIONS


MD	Managing Director
HSEM	Health, Safety & Environment Manager
OOPC	Okomu Oil Palm Company
COD	Chemical Oxygen Demand
BOD	Biochemical Oxygen Demand
PM	Particulate Matter
POME	Palm Oil Mill Effluent
NESREA	National Environmental Standards & Regulations Enforcement Agency
RSPO	Roundtable on Sustainable Palm Oil
ISO	International Organization for Standardization

## 4. DEFINITIONS

**Roundtable on Sustainable Palm Oil (RSPO):** an international not-for-profit association founded in April 2004. It is a membership organization, open to all major players along the supply chain. The RSPO came as a timely intervention to negate the undue concerns on palm oil cultivation in a sustainable way to meet the growing demand for vegetable oil, especially against the background of the growing concerns by environmentalists and consumers, amongst other groups, on the negative impact of the oil palm industry on the environment. OOPC has declared its willingness to be part of the platform to drive the processes for the implementation and interpretation of the RSPO Principles and Criteria.

**pH:** measure of how acidic/basic a liquid is. The range varies between 0 - 14, with 7 being neutral. A pH of less than 7 indicates acidic whilst a pH of greater than 7 indicates a basic environment.



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## 5. LEGAL REQUIREMENTS

The National legislation applicable to this procedure includes:

- The National Policy On Environment, 1999
- National Guidelines and Standards for Environmental pollution Control in Nigeria, 1991
- National Effluent Limitations Regulations S.I.8, 1991
- National guidelines for Environmental Audit in Nigeria. 1999
- National Guidelines on Environmental Management System in Nigeria 1999
- National Environmental Standards and Regulations Enforcement Agency (NESREA 2007) - National Environmental Regulations, 2009. S.I No. 28, 29, 17, 20, and 23.
- Waste Management and Hazardous Waste Regulations S.I.15, 1991
- National Policy on Renewable Energy Development

## 6. RESPONSIBILITIES

- Estate Department is responsible for moving solid waste from disposal points to the dumpsites.
- HSEM shall monitor compliance with this procedure and continuously assess methods of effective waste/pollution management.


## 7. PROCEDURE

### 7.1. Basic Principles Of Waste & Pollution Management

In order to achieve its waste avoidance and minimization objectives, OOPC encourages its employees to follow the hierarchy below of waste management principles in all aspects of their operations:

- Reduce
- Reuse
- Recycle/ Reprocess
- Recover
- Refuse

Thoughtful use of all materials and using the basic principle of waste and pollution management is good for the environment and good for business. If an item can be used more than once, it will be used as such and if a used item can be put to another use, it will be recycled. OOPC developed a system to record waste types and quantities for all waste streams. This will help demonstrate a step towards better waste management, as it will allow the establishment of standard/normal waste levels. Records of waste quantities will allow OOPC to assess the performance of its operations to avoid and minimize waste. The avoidance of printing of unnecessary documents/emails and reusing the reverse side of paper are prime examples of our commitment to avoiding and minimizing waste.

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## 7.2. Waste & Pollution Prevention And Control

Good waste and pollution prevention and control practices in the industry focus on the following main areas:

- Reduction of product losses through strong and active production controls, including continuous sampling and measuring of key production parameters allowing production losses to be identified and reduced, thus reducing the waste load.
- Maintain a clean workplace, recover product, and control air emissions.
- By-products recycling and sale (see below).
- Re-use of materials (e.g. empty fertilizer bags).

## 7.3. Waste Disposal & Duty of Care

OOPC has a duty of care to take all reasonable measures to:

- Ensure that all waste is stored and disposed of responsibly.
- Ensure that waste is only handled or dealt with by individuals or departments that are authorized to deal with it.
- Ensure that the use of fire to dispose waste is avoided.


## 7.4. Waste Generation & Disposal

### 7.4.1 SOLID WASTE

The main solid wastes generated and the methods of disposal are as follows:

- Used oil filters (excess oil drained off before disposal). Collected by a government approved collector/organization.



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- Empty fruit bunches (EFB). Returned to the plantation and used as a mulch.
- Fibre: Used as boiler fuel and in the field.
- Shell: Used as boiler fuel.
- Clinker/Boiler ash: Used in the field.
- Calyx/Leaf from FFB conveyor: Used in the field
- Tricanter Waste: Used in the field
- Scrap metal: Stored at designated locations and sold to dealers for recycling. The sale will be handled by internal audit Unit.
- Empty fertilizer bags/Cellophane: Triple rinsed and then reused for harvesting operations.
- Empty agrochemical containers are triple rinsed, punched and then sent to the allocated area at the dumpsite awaiting final evacuation by the suppliers/manufactures. Bigger agrochemical containers are used as temporary receptacles during spraying activities.
- Used tyres: Stored at designated locations and sold to dealers for recycling.
- Expired batteries. Stored at designated locations and sold to dealers for recycling.
- Photocopier Toner and Printer ink cartridges: Stored at designated locations and sold to dealers for recycling.
- Redundant Electronics: Stored at designated locations and sold for reuse.
- Used spill kits: Collected by government approved collector/organization
- Solid waste: Collected on a routine basis and disposed of at designated dumping sites. A bulldozer or pay loader will be used from time to time at dumping sites to push waste inwards for more space at the discharge point.
- Electric bulbs/fluorescent tubes: Stored at designated locations (dumpsite) and sold to approved collectors.
- Saw dusts: reused as spill kit and collected by approve waste collector.
- Biohazards and medical sharps from Clinic: disposed of in the incinerator.
- Waste papers: stored in the dumpsite.
- Glass and bottles: Stored at designated locations at dumpsite and sold to approved dealers for recycling.

The location of designated dumping sites was carefully chosen to ensure that it is not near a residential area and not near any water courses or bodies of water. Designated dumping sites are clearly demarcated and access restricted for designated staff only.

#### 7.4.2 LIQUID WASTE

The main liquid waste generated is the palm oil mill effluent (POME) generated by the processing of fresh fruit bunches. Liquid process wastes are passed through sludge tanks and fat traps to recover oil before being discharged into an effluent lagoon for final biological degradation of the remaining waste load. POME will be analyzed on a quarterly basis for the following parameters, for which the NESREA (see legal requirements) limits are indicated:

- pH (range at final discharge 6.0 -9.0)
- BOD (maximum at final discharge 30 mg/l)
- COD (maximum at final discharge 80 mg/l)

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- Suspended solids (maximum at final discharge 30 mg/l)
- Oil & grease (maximum at final discharge 10 mg/l)

Monitoring data will be analyzed and reviewed at regular intervals and compared with the operating standards so that any necessary corrective actions can be taken. Records of monitoring results are kept in file. The results will be reported to the responsible authorities and relevant parties, as required.

Used oil from vehicles and maintenance activities is stored in tanks and drums in a specified area to be sold to dealers for appropriate recycling and disposal.

#### 7.4.3 GASEOUS WASTE

The main sources of air emissions are from the flue gases from the boilers, machineries, vehicles, and heavy duty machines and Generator sets. These contain amount of carbon monoxide, carbon dioxide and nitrogen oxides. There is also particulate matter.

Boilers are built with equipment used to remove as much unburned particulate matter as possible.


#### Emissions guidelines

Emissions levels for the design and operation of each project will be established through the environmental assessment (EA) process on the basis of national legislation. The guidelines below present emissions levels acceptable to the World Bank. Concentrations of contaminants emitted from the stacks of large boilers, furnaces, incinerators, and electrical generating equipment should not exceed the following limits (milligrams per normal cubic meter) as per National Air Pollution Standards 1991. This will be monitored quarterly.

Pollutants	Ambient Limits	Limit from stationary sources(for 24 hrs)
Particulates	250 mg/m <sup>3</sup> (Daily average of daily values 1 hour)	0.15-0.5 mg/m <sup>3</sup>
Sulphur dioxides (SO <sub>2</sub> )	250 mg/m <sup>3</sup> (Daily average of daily values 1 hour)	0.15-0.5 mg/m <sup>3</sup>
Carbon monoxide	10 ppm (11.4 mg/m <sup>3</sup> )- 20 ppm (22.8mg/m <sup>3</sup> ) (Daily average of hourly values 8-hours)	1.0 – 5.0 mg/m <sup>3</sup>
Nitrogen dioxides (NO <sub>2</sub> )	0.04 ppm - 0.06 ppm (75.0– 113 mg/m <sup>3</sup> ) Daily average of 1-hourly values (range)	0.004 – 0.1 mg/m <sup>3</sup>

#### 7.4.4 LITTER

In order to reduce litter being dropped in public and working areas, litter bins are put in place. The litter bins will be emptied and litter disposed on a scheduled basis

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(see days of waste collection in OOPC pamphlet). Weight of the litter will be taken to estimate the total amount going to the dumpsite and calculated annually for total waste disposed at the dump site. The weight estimation shall be conducted at the weighbridge and the documented weight shall be kept for record keeping at HSE department.

#### 7.4.5 DUST

Dust from roads may present an environmental hazard, particularly to those working or living near busy roads. Mitigation measures include:

- Enforcing speed limits (20 kph in residential areas and industrial).
- Diverting traffic to avoid residential and industrial areas.
- Sealing roads in residential and industrial areas.
- Watering of main roads during the dry season.

#### 7.4.6 ODOR

Odor from operations can usually be prevented through good housekeeping. When planning the location of residential sites, odor from operations should be considered. Thus, the dumpsites are located at least 500m from existing residential areas. The rubber factory effluent pond is about 500m from the rubber estate while the oil mill's effluent lagoon is approximately 1000m from the nearest residential quarters.


#### 7.4.7 NOISE

Noise from operations may present an environmental hazard, particularly for those working/living near noise generating machinery and equipment. Mitigation measures include:

- Installing noise reducing equipment such as silencers and mufflers.
- Maintaining machinery and equipment to minimize noise levels.
- Putting noisy machinery and equipment inside a purpose-built building that reduces the effects of the noise.
- Redesigning noisy machinery and equipment to reduce noise.
- Ear plugs.

#### 7.5. Waste Tracking System

OOPC currently tracks wastes that are of dire consequences to the environment and safety of its personnel. To this end, chemical containers used at plantation are tracked from the time it leaves the store to the dumpsite. ALL containers that leave the store should be returned to the store handler after use who must immediately record the total number given out and received (See Appendix III). All used chemical containers must be triple rinsed and the containers returned to the store handler after perforating. Finally, the chemical containers are taken to the dumpsite awaiting collection by the suppliers. The water from the washed containers is poured into the knapsack for spraying. The store handler must then

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record the amount of containers sent to the dumpsite which must correspond to the amount entered by the dumpsite attendant after receipt by him at the dumpsite.

Effluent volume is monitored daily with the aid of a flow meter installed at the discharge point at the Oil mill and rubber factory for monitoring the amount of effluent released to the lagoon or pond. A monthly data sheet is generated (See Appendix III).

Scheduled waste such as Used Oil Filters, Used Oil, Biohazardous materials, used batteries, tyres, toners etc must be inventoried departmentally on a monthly basis on OOPC/Form 2.6 and record sent to HSE Manager for collation.

## 8. RECORDS


- Quarterly Inspection Report
- OOPC/Form 2.1
- OOPC/Form 2.5
- OOPC/Form 2.6
- Weighbridge Ticket
- Environmental Policy

## 9. REFERENCE


- RSPO Criteria 7.2, 7.3 and 7.8
- FSC Criteria 6.7
- IFC (2012) Performance Standard 3: Resource Efficiency and Pollution Prevention
- ISO 14001:2015 Clause 5.2

## 10. REVISION STATUS

Rev.	Date	Details
0	09/02/16	Initial Release
1	06/04/17	Addition in Section 8 – Records Change ISO “14001:2004 Clause 4.2” to ISO 14001:2015 Clause 5.2
2	10/05/18	Addition of sentences in §7.4.1, §7.4.4 and §7.5
3	13/07/19	Addition in 7.4.1 Waste generation and disposal. “final biological degradation of the remaining waste load” replaced “treatment and ultimate reuse in plantation” in §7.4.2 Addition in 7.4.3 Gaseous Waste Addition in Appendix I and III

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4	17/06/20	<p>Addition in §1.1.4</p> <p>Added RSPO &amp; ISO in §3- Abbreviation</p> <p>Changed project to procedure in §5- Legal Requirement</p> <p>Addition in §7.1</p> <p>Changed shall to should in §7.4.6</p> <p>Addition in §7.4.7 &amp; §7.5</p> <p>Added Environmental Policy in §8- Records</p> <p>Changed RSPO Criteria 4.6 and 5.3 to RSPO 2018 P&amp;C 7.2, 7.3 and 7.8 in §9- Reference</p>

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## APPENDIX I: WASTE MANAGEMENT PLANS AT OKOMU OIL PALM COMPANY

S/No.	TYPE OF WASTE	STORAGE SYSTEM	VOLUME GENERATED	TRANSPORTATION / REMOVAL RATE	FINAL DISPOSAL	REMARKS
1.	<b>Household Organic waste:</b> <ul style="list-style-type: none"> <li>Left- over Food</li> <li>Organic residue (garden waste)</li> </ul>	<ul style="list-style-type: none"> <li>Waste bins</li> </ul>	<ul style="list-style-type: none"> <li>Waste inventory necessary for quantity generated</li> </ul>	<ul style="list-style-type: none"> <li>Tractor / Daily</li> </ul>	<ul style="list-style-type: none"> <li>Solid waste dumpsite</li> <li>Plantation field</li> </ul>	
	<b>Household Inorganic Waste:</b> <ul style="list-style-type: none"> <li>Plastic Polythene bags e.g. pure water sachets</li> <li>Glass wares</li> <li>Empty cans</li> <li>Paper trash</li> </ul>	<ul style="list-style-type: none"> <li>Waste bins (Sorting necessary)</li> </ul>	<ul style="list-style-type: none"> <li>Waste inventory necessary for quantity generated</li> </ul>	<ul style="list-style-type: none"> <li>Tractor / Twice weekly</li> </ul>	<ul style="list-style-type: none"> <li>Solid waste dumpsite</li> </ul>	
2.	<b>Plantation Organic waste:</b> <ul style="list-style-type: none"> <li>Palm and rubber leaves, shrubs, weeds</li> </ul>	<ul style="list-style-type: none"> <li>None</li> </ul>	N/A	<ul style="list-style-type: none"> <li>Ad hoc</li> </ul>	<ul style="list-style-type: none"> <li>Plantation field</li> </ul>	
	<b>Plantation Inorganic waste:</b> <ul style="list-style-type: none"> <li>Polythene bags</li> <li>Damaged latex cups</li> </ul>	<ul style="list-style-type: none"> <li>Kept in the store.</li> </ul>	<ul style="list-style-type: none"> <li>Waste inventory necessary for quantity</li> </ul>	<ul style="list-style-type: none"> <li>Tractor / As required</li> </ul>	<ul style="list-style-type: none"> <li>Dump site (To be reused or sold)</li> </ul>	
	<b>Plantation Hazardous waste:</b> <ul style="list-style-type: none"> <li>Empty agrochemical containers.</li> <li>Fertilizer bags</li> <li>Expired agrochemicals</li> </ul>	<ul style="list-style-type: none"> <li>Collected and kept in the store</li> </ul>	<ul style="list-style-type: none"> <li>Waste inventory necessary for quantity generated</li> </ul>	<ul style="list-style-type: none"> <li>As required</li> </ul>	<ul style="list-style-type: none"> <li>Taken to dumpsite and taken away by the supplier</li> <li>Fertilizer bags are reused</li> </ul>	




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3.	<b>Palm Oil Mill (POM) waste:</b> <ul style="list-style-type: none"> <li>• Palm Oil Mill Effluent</li> <li>• Sludge</li> <li>• Empty Fruit Bunches (EFB)</li> <li>• Fibres</li> <li>• Kernel shell</li> <li>• Boiler ash</li> <li>• Damaged/Faulty banga plastic containers</li> </ul>	<ul style="list-style-type: none"> <li>• Palm Oil Mill premises</li> <li>• The damaged/faulty plastic containers are kept in the store</li> </ul>	<ul style="list-style-type: none"> <li>• Waste inventory necessary for quantity generated</li> </ul>	<ul style="list-style-type: none"> <li>• Pipe lines for the POME / simultaneously with production</li> <li>• Tractor for EFB, fibres, boiler ash, kernel shell and sludge / As required</li> </ul>	<ul style="list-style-type: none"> <li>• Effluent Lagoon for the POME</li> <li>• EFB as mulch in the field</li> <li>• Fibres and Kernel shell used to fire the boiler.</li> <li>• Damaged banga container returned to supplier.</li> <li>• Boiler Ash used for road maintenance</li> </ul>	
4.	<b>Rubber Factory waste:</b> <ul style="list-style-type: none"> <li>• Rubber Effluent</li> <li>• Rubber sludge</li> <li>• Low quality crump rubber</li> <li>• Polythene bags</li> <li>• Damaged pellets</li> </ul>	<ul style="list-style-type: none"> <li>• No storage</li> <li>• Decantation pit</li> <li>• Different bins for different rubber waste</li> <li>• Damaged pellets and polythene bags are stored in the factory</li> </ul>	<ul style="list-style-type: none"> <li>• Waste inventory necessary for quantity generated</li> </ul>	<ul style="list-style-type: none"> <li>• Pipe line for the rubber effluent simultaneously with production</li> <li>• None for low quality rubber and damaged pellets</li> </ul>	<ul style="list-style-type: none"> <li>• Effluent pond</li> <li>• Low quality rubber is recycled</li> <li>• Rubber sludge is taken to the plantation field as manure</li> </ul>	

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5.	<b>Laboratory waste (Hazardous):</b> <ul style="list-style-type: none"> <li>• Used chemicals</li> <li>• Empty chemical containers</li> <li>• Glassware</li> </ul>	<ul style="list-style-type: none"> <li>• Used chemicals are channeled to a specially designed soak away pit</li> <li>• Empty chemical containers and expired ones are well secured waiting for evacuation</li> </ul>	<ul style="list-style-type: none"> <li>• Waste inventory necessary for quantity generated</li> </ul>	<ul style="list-style-type: none"> <li>• Tractor / As required</li> </ul>	<ul style="list-style-type: none"> <li>• Dumpsite and taken away by the supplier</li> <li>• Glassware taken to the solid dumpsite</li> </ul>	
6.	<b>Workshop Hazardous waste:</b> <ul style="list-style-type: none"> <li>• Spent oil</li> <li>• Used oil filters</li> <li>• Empty paint containers</li> <li>• Condemn batteries</li> </ul>	<ul style="list-style-type: none"> <li>• Spent oil is kept in drums inside the workshop (special mgt system in place)</li> </ul>	<ul style="list-style-type: none"> <li>• Waste inventory necessary for quantity generated</li> </ul>	<ul style="list-style-type: none"> <li>• Tractors taking the drums from different locations / As required</li> </ul>	<ul style="list-style-type: none"> <li>• Used oil filters and spent oil are sold</li> <li>• Empty paint cans are collected by supplier and reused</li> </ul>	
	<b>Non-hazardous waste:</b> <ul style="list-style-type: none"> <li>• Scrap metals</li> <li>• Metal chips</li> <li>• Tyres</li> <li>• Paper</li> </ul>	<ul style="list-style-type: none"> <li>• Scrap yard for scrap metals including tyres, batteries</li> </ul>	<ul style="list-style-type: none"> <li>• Waste inventory necessary for quantity generated</li> </ul>	<ul style="list-style-type: none"> <li>• Tractor</li> </ul>	<ul style="list-style-type: none"> <li>• Scraps are sold</li> <li>• Tyres are sold</li> <li>• Paper to the dumpsite</li> </ul>	
7.	<b>Medical waste:</b> <ul style="list-style-type: none"> <li>• Needles and syringes</li> <li>• Pathological waste</li> </ul>	<ul style="list-style-type: none"> <li>• Pedal waste bin</li> </ul>	<ul style="list-style-type: none"> <li>• Waste inventory necessary for quantity generated</li> </ul>	<ul style="list-style-type: none"> <li>• Clinic van</li> </ul>	<ul style="list-style-type: none"> <li>• Boiler</li> </ul>	<ul style="list-style-type: none"> <li>• Medical wastes are classified as special waste that requires special</li> </ul>

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8.	<b>Office waste:</b> <ul style="list-style-type: none"> <li>• Paper</li> <li>• Computer hardware and accessories</li> <li>• Plastic bottles</li> <li>• Polythene bags and wrappers</li> </ul>	<ul style="list-style-type: none"> <li>• Different waste bins. (Sorting is necessary)</li> </ul>	<ul style="list-style-type: none"> <li>• Waste inventory necessary for quantity generated</li> </ul>	<ul style="list-style-type: none"> <li>• Tractor/ Everyday</li> </ul>	<ul style="list-style-type: none"> <li>• Solid dumpsite</li> </ul>	<ul style="list-style-type: none"> <li>• Computer hardware and accessories are hazardous wastes</li> </ul>
9.	<b>Estate Waste:</b> <ul style="list-style-type: none"> <li>• Bulbs and fluorescent tube</li> <li>• Construction wastes and trash(empty paint cans)</li> <li>• Saw dust</li> <li>• Metal and plastic scraps (machines, air conditions, fridge etc)</li> </ul>	<ul style="list-style-type: none"> <li>• Waste bin</li> <li>• Spill kit bins</li> <li>• Scrap yard</li> </ul>	<ul style="list-style-type: none"> <li>• Waste inventory necessary for quantity generated</li> </ul>	<ul style="list-style-type: none"> <li>• Tractor / Twice weekly</li> <li>• Collected by various departments for reuse</li> <li>• Tractor / Twice weekly</li> </ul>	<ul style="list-style-type: none"> <li>• Solid dumpsite</li> <li>• Collected by various departments for reuse</li> <li>• Dumpsite and scrap yard</li> </ul>	<ul style="list-style-type: none"> <li>• Bulbs and fluorescent tube are hazardous waste</li> <li>• Saw dusts are reusable material.</li> <li>• AC/Fridges sold to staff and others for reuse.</li> </ul>

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## APPENDIX II

### **WASTE TREATMENT FACILITIES**

1. Solid waste dumpsite
2. Effluent treatment lagoon and pond
3. Scrap yard
4. Boiler
5. Plantation field

### **MEANS OF WASTE STORAGE AND COLLECTION**


1. Waste bins
2. Collection points
3. Tractor
4. Pipe lines
5. Clinic Van

### **ENERGY REQUIREMENTS**

1. AGO
2. Electricity

### **OCCUPATIONAL HEALTH REQUIREMENTS (PPE)**

1. Waste collectors and Waste managers

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### APPENDIX III: WASTE INVENTORY AND TRACKING SYSTEM

#### 1. EMPTY CHEMICAL CONTAINERS (See OOPC/Form 2.1):

All chemical containers are been tracked using the table below:

Date	No of Containers Out of store	No of Containers returned to store handler after washing	No of Containers to Dumpsite	Dumpsite Attendant Sign

#### 2. Palm Oil Mill Effluent (POME) and Rubber Effluent

MONTH		MONTH		MONTH		MONTH	
DATE	READING	DATE	READING	DATE	READING	DATE	READING

#### 3. Scheduled Waste Inventory Form OOPC/Form 2.6

Department: .....

Month/Year: ...../.....

To be filled in and submitted to HSE department every month

Type of waste material	Unit	Quantity generated		Quantity disposed off		Site of disposal and remarks if any.
		This month	To-date	This month	To-date	
Used Oil Filters						
Used Oil/Lubricants						
Medical Sharps						
Bio hazardous materials/Clinical waste						
Empty Paint Containers						
Condemned Vehicle Batteries						
Used Alkaline Batteries (small types)						
E-waste (Electronics Waste)						
Expired Chemicals/Pesticides						
Tyres						
Toners/Ink Cartridges						
Scrap Metals						
Empty fertilizer/Nursery Bags						

## **APPENDIX D**

**Corporate Social Responsibility (CSR) for 2018-2020**

**Lagos Office:**

**Tel: 01-84446337**

**E-mail: lagosoffice@okomunigeria.com**

**Okomu – Udo, Ovia South West L.G.A**

**P.M.B. 1449, Benin City.**

**Edo State, Nigeria.**

**E-Mail: [info@okomunigeria.com](mailto:info@okomunigeria.com), [compsec@okomunigeria.com](mailto:compsec@okomunigeria.com)**

**Web: [www.okomunigeria.com](http://www.okomunigeria.com)**

24th November 2017

The Amakosiwe  
Inikrogha Community  
Ovia SW LGA  
Edo State

Dear Sir,

**PROJECTS BY OKOMU OIL PALM COMPANY PLC IN 2018 IN YOUR COMMUNITY**

Based upon our ongoing corporate social responsibility (CSR) programme and in line with our Free, Prior and Informed (FPIC) commitments with your community, we are pleased to confirm that the following projects requested by your community will be erected by our company as follows:

1. Grading of your road, the distance to be graded to be determined solely by the OOPC Engineer and subject to the availability of the grader in the 1<sup>st</sup> quarter (Jan – Mar);
2. Skills development for one year at a Training Centre for 4 youths (chosen strictly according to the guidelines issued by the Company to your Committee);
3. The issuance of 2 bursaries valued at ₦90,000.00 each (as per the guidelines issued to your Committee by our Company previously);
4. One garri grinding machine, as determined by the OOPC Engineer alone, in the 2<sup>nd</sup> quarter (Apr – Jun);

My Community Liaison Officer and Projects personnel will liaise with you on the relevant projects stated herein.

Please acknowledge receipt of, and acceptance of, the terms and conditions stated in this letter on behalf of your Committee & Community by signing the enclosed duplicate copy and returning it to my office.

Kind regards,



Dr G. Hefer  
Managing Director

Cc; HRM, Projects Engineer, HSE Manager, CLO, Media Officer, Estate Superintendent

**Lagos Office:**

**Tel: 01-84446337**

**E-mail: [lagosoffice@okomunigeria.com](mailto:lagosoffice@okomunigeria.com)**

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**Web: [www.okomunigeria.com](http://www.okomunigeria.com)**

14 December 2017

The Amakosiwe  
Ofunama Community  
Ovia SW LGA  
Edo State

Dear Sir,

**PROJECTS BY OKOMU OIL PALM COMPANY PLC IN 2017 IN YOUR COMMUNITY**


Based upon our ongoing corporate social responsibility (CSR) programme with your community, and subject to confirmation of the renewal of your CDA with the relevant LGA authority for 2017, we are pleased to confirm that the following projects requested by your community through your CDA will be erected by our company as follows:

1. Grading of the Ofunama, Ojakarama and Jamagie roads, as determined by the OOPC engineer alone – 1<sup>st</sup> quarter 2017 (Jan – Mar);
2. Completion of the guest house, as determined by the OOPC engineer alone – 1<sup>st</sup> quarter 2017 (Jan – Mar);
3. The issuance of 3 bursaries valued at ₦90,000.00 each (as per the guidelines issued to your Committee by our Company previously);
4. Skills development for one year at a Training Centre for 4 youths (chosen as per the guidelines issued by the Company to your Committee previously);

My Community Liaison Officer and Projects personnel will liaise with you on the relevant projects stated herein.

Please acknowledge receipt of, and acceptance of, the terms and conditions stated in this letter on behalf of your Committee & Community by signing the enclosed duplicate copy and returning it to my office.

Kind regards,



Dr G. Hefer  
Managing Director

cc: HRM, Projects Engineer, HSE Manager, CLO, Media Officer



**Lagos Office:**

**Tel: 01-84446337**

**E-mail: lagosoffice@okomunigeria.com**

**Okomu – Udo, Ovia South West L.G.A**

**P.M.B. 1449, Benin City.**

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**Web: [www.okomunigeria.com](http://www.okomunigeria.com)**

24th November 2017

The Chairman  
Agbede Community  
Ocia SW LGA  
Edo State

Dear Sir,

**PROJECTS BY OKOMU OIL PALM COMPANY PLC IN 2018 IN YOUR COMMUNITY**

Based upon our ongoing corporate social responsibility (CSR) programme and in line with our Free, Prior and Informed (FPIC) commitments with your community, we are pleased to confirm that the following projects requested by your community will be erected by our company as follows:

1. The issuance of 2 bursaries valued at ₦90,000.00 each (strictly chosen according to the guidelines issued to your Committee by our Company);
2. Skills development for one year at a Training Centre for 2 youths (chosen strictly according to the guidelines issued by the Company to your Committee);
3. One borehole, as determined by the OOPC Engineer alone, in the 2<sup>nd</sup> quarter (Apr – Jun);

My Community Liaison Officer and Projects personnel will liaise with you on the relevant projects stated herein.

Please acknowledge receipt of, and acceptance of, the terms and conditions stated in this letter on behalf of your Committee & Community by signing the enclosed duplicate copy and returning it to my office.

Kind regards,



Dr G. Hefer  
Managing Director

Cc; HRC, Projects Engineer, HSE Manager, CLO, Media Officer, Estate Superintendent

**Lagos Office:**  
**Tel: 01-84446337**  
**E-mail: lagosoffice@okomunigeria.com**

**Okomu – Udo, Ovia South West L.G.A**  
**F.M.B. 1449, Benin City.**  
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**Web: [www.okomunigeria.com](http://www.okomunigeria.com)**

24th November 2017

The Odionwere  
Maghionba Community  
Ovia SW LGA  
Edo State

Dear Sir,

**PROJECTS BY OKOMU OIL PALM COMPANY PLC IN 2018 IN YOUR COMMUNITY**

Based upon our ongoing corporate social responsibility (CSR) programme and in line with our Free, Prior and Informed (FPIC) commitments with your community, we are pleased to confirm that the following projects requested by your community will be erected by our company as follows:

1. Grading of certain roads, the duration and amount to be graded to be determined solely by the OOPC Engineer and subject to the availability of the grader;
2. Skills development for one year at a Training Centre for 2 youths (chosen strictly according to the guidelines issued by the Company to your Committee);
3. One community hall, as determined by the OOPC Engineer alone, in the 2<sup>nd</sup> quarter (Apr – Jun);

My Community Liaison Officer and Projects personnel will liaise with you on the relevant projects stated herein.

Please acknowledge receipt of, and acceptance of, the terms and conditions stated in this letter on behalf of your Committee & Community by signing the enclosed duplicate copy and returning it to my office.

Kind regards,



Dr. G. Hefer  
Managing Director

Cc; HRM, Projects Engineer, HSE Manager, CLO, Media Officer, Estate Superintendent

**Lagos Office:**

**Tel: 01-84446337**

**E-mail: lagosoffice@okomunigeria.com**

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**Web: [www.okomunigeria.com](http://www.okomunigeria.com)**

23 November 2017

The Chairman  
Gbole-Uba Community  
Ovia SW LGA  
Edo State

Dear Sir,

**PROJECTS BY OKOMU OIL PALM COMPANY PLC IN 2018 IN YOUR COMMUNITY**

Based upon our ongoing corporate social responsibility (CSR) programme and in line with our Free, Prior and Informed (FPIC) commitments with your community, we are pleased to confirm that the following projects requested by your community will be erected by our company as follows:

1. A community guest house/corpers lodge as determined by the OOPC engineer alone – 2nd quarter 2018 (Apr - Jun);
2. A borehole, as determined by the OOPC engineer alone – 3rd quarter 2018 (Jul – Sep);
3. The issuance of 2 bursaries valued at ₦90,000.00 each (as per the guidelines issued to your Committee by our Company previously);
4. Skills development for one year at a Training Centre for 3 youths (chosen as per the guidelines issued by the Company to your Committee previously);
5. Grading of the road, as stipulated by the OOPC engineer alone;

My Community Liaison Officer and Projects personnel will liaise with you on the relevant projects stated herein.

Please acknowledge receipt of, and acceptance of, the terms and conditions stated in this letter on behalf of your Committee & Community by signing the enclosed duplicate copy and returning it to my office.

Kind regards,



Dr G. Hefer  
Managing Director

cc: HRM, Projects Engineer, HSE Manager, CLO, Media Officer, Estate Superintendent

**Lagos Office:**

**Tel: 01-84446337**

**E-mail: lagosoffice@okomunigeria.com**

**Okomu – Udo, Ovia South West L.G.A**

**P.M.B. 1449, Benin City.**

**Edo State, Nigeria.**

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**Web: [www.okomunigeria.com](http://www.okomunigeria.com)**

23 November 2017

The Chairman  
Madagbayo Community  
Ovia SW LGA  
Edo State

Dear Sir,

**PROJECTS BY OKOMU OIL PALM COMPANY PLC IN 2018 IN YOUR COMMUNITY**

Based upon our ongoing corporate social responsibility (CSR) programme and in line with our Free, Prior and Informed (FPIC) commitments with your community, we are pleased to confirm that the following projects requested by your community will be erected by our company as follows:

1. A community hall to the value and size as determined by the OOPC engineer alone – 1st quarter 2017 (Jan – Mar);
2. The drilling of one borehole as determined by the OOPC engineer alone – 4<sup>th</sup> quarter 2017.
3. The issuance of 2 bursaries valued at ₦90,000.00 each (as per the guidelines issued to your Committee by our Company previously);
4. Skills development for one year at a Training Centre for 3 youths (chosen as per the guidelines issued by the Company to your Committee);
5. Grading of road, the distance and manner of grading to be determined by the OOPC Engineer alone;

My Community Liaison Officer and Projects personnel will liaise with you on the relevant projects stated herein.

Please acknowledge receipt of, and acceptance of, the terms and conditions stated in this letter on behalf of your Committee & Community by signing the enclosed duplicate copy and returning it to my office.

Kind regards,



Dr G. Hefer  
Managing Director

cc: HRM, Projects Engineer, HSE Manager, CLO, Media Officer, Estates Superintendent



**Lagos Office:**  
**Tel: 01-84446337**  
**E-mail: lagosoffice@okomunigeria.com**

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**Web: [www.okomunigeria.com](http://www.okomunigeria.com)**

23 November 2017

The Chairman  
Gbelebu Community  
Ovia SW LGA  
Edo State

Dear Sir,

**PROJECTS BY OKOMU OIL PALM COMPANY PLC IN 2018 IN YOUR COMMUNITY**

Based upon our ongoing corporate social responsibility (CSR) programme and in line with our Free, Prior and Informed (FPIC) commitments with your community, we are pleased to confirm that the following projects requested by your community will be erected by our company as follows:

1. The sinking of 3 boreholes, as determined by the OOPC engineer alone – a borehole in the 1st quarter 2018 (Jan – Mar), 3<sup>rd</sup> quarter (Jul – Sep) and 4<sup>th</sup> quarter (Oct – Dec);
2. The issuance of 2 bursaries valued at ~~N~~90,000.00 each (as per the guidelines issued to your Committee by our Company previously);
3. Skills development for one year at a Training Centre for 5 youths (chosen as per the guidelines issued by the Company to your Committee previously);
4. Grading of road, the distance and manner of grading as determined by the OOPC Engineer alone;

My Community Liaison Officer and Projects personnel will liaise with you on the relevant projects stated herein.

Please acknowledge receipt of, and acceptance of, the terms and conditions stated in this letter on behalf of your Committee & Community by signing the enclosed duplicate copy and returning it to my office.

Kind regards,



Dr. G. Hefer  
Managing Director

cc: HRM, Projects Engineer, HSE Manager, CLO, Media Officer, Estate Superintendent

Lagos Office:

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Web: [www.okomunigeria.com](http://www.okomunigeria.com)

24<sup>th</sup> November 2017

The Chairman

Uhiere

Ovia NE LGA

Edo State

Dear Sir,

**PROJECTS BY OKOMU OIL PALM COMPANY PLC IN 2018 IN YOUR COMMUNITY**

Based upon our ongoing corporate social responsibility (CSR) programme and in line with our Free, Prior and Informed (FPIC) commitments with your community, we are pleased to confirm that the following projects requested by your community will be erected by our company as follows:

1. The issuance of 1 bursary valued at ₦90,000.00 each (as per the guidelines issued to your Committee by our Company previously);
2. Grading of road, the distance and manner of grading as determined by the OOPC Engineer alone – 2<sup>nd</sup> quarter (Apr – Jun);
3. Skills development for one year at a Training Centre for 2 youths (chosen as per the guidelines issued by the Company to your Committee previously);
4. Repair of current borehole, as stipulated by the OOPC engineer in the 1<sup>st</sup> quarter (Jan – Mar),
5. Renovation of 12 room teacher staff quarters, as stipulated by the OOPC engineer alone in the 3<sup>rd</sup> quarter (Jul – Sep);
6. A new borehole, as stipulated by the OOPC engineer alone in the 4<sup>th</sup> quarter (Oct – Dec);

My Community Liaison Officer and Projects personnel will liaise with you on the relevant projects stated herein.

Please acknowledge receipt of, and acceptance of, the terms and conditions stated in this letter on behalf of your Committee & Community by signing the enclosed duplicate copy and returning it to my office.

Kind regards,



Dr G. Hefer  
Managing Director

Cc: HRC, Projects Engineer, HSE Manager, CLO, Media Officer, Estate Superintendent

**Lagos Office:**  
**Tel: 01-84446337**  
**E-mail: lagosoffice@okomunigeria.com**

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**Web: [www.okomunigeria.com](http://www.okomunigeria.com)**

24<sup>th</sup> November 2017

The Chairman  
Agbinikaka  
Ovia NE LGA  
Edo State

Dear Sir,

**PROJECTS BY OKOMU OIL PALM COMPANY PLC IN 2018 IN YOUR COMMUNITY**

Based upon our ongoing corporate social responsibility (CSR) programme and in line with our Free, Prior and Informed (FPIC) commitments with your community, we are pleased to confirm that the following projects requested by your community will be erected by our company as follows:

1. The issuance of 1 bursary valued at ₦90,000.00 each (as per the guidelines issued to your Committee by our Company previously);
2. Skills development for one year at a Training Centre for 2 youths (chosen as per the guidelines issued by the Company to your Committee previously);
3. One semi industrial borehole, as stipulated by the OOPC engineer alone in the 1st quarter (Jan – Mar);
4. 1 by 5 market stalls, as stipulated by the OOPC engineer alone in the 2nd quarter 2017 (Apr – Jun);
5. Construction of Odionwere's palace (Phase 1), as stipulated by the OOPC engineer alone in the 3rd quarter (Jul – Sep);

My Community Liaison Officer and Projects personnel will liaise with you on the relevant projects stated herein.

Please acknowledge receipt of, and acceptance of, the terms and conditions stated in this letter on behalf of your Committee & Community by signing the enclosed duplicate copy and returning it to my office.

Kind regards,



Dr G. Hefer  
Managing Director

Cc: HRM, Projects Engineer, HSE Manager, CLO, Media Officer, Estate Superintendent



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Web: [www.okomunigeria.com](http://www.okomunigeria.com)

24<sup>th</sup> November 2017

The Chairman  
Odiguetue  
Ovia NE LGA  
Edo State

Dear Sir,

**PROJECTS BY OKOMU OIL PALM COMPANY PLC IN 2018 IN YOUR COMMUNITY**

Based upon our ongoing corporate social responsibility (CSR) programme and in line with our Free, Prior and Informed (FPIC) commitments with your community, we are pleased to confirm that the following projects requested by your community will be erected by our company as follows:

1. The issuance of 1 bursary valued at ₦90,000.00 each (as per the guidelines issued to your Committee by our Company previously);
2. Grading of road, the distance and manner of grading as determined by the OOPC Engineer alone in the 1<sup>st</sup> quarter (Jan – Mar);
3. Skills development for one year at a Training Centre for 2 youths (chosen as per the guidelines issued by the Company to your Committee previously);
4. Drilling of one borehole, as stipulated alone by the OOPC engineer in the 4<sup>th</sup> quarter (Oct – Dec);
5. Renovation of 2<sup>nd</sup> in command's house, as stipulated alone by the OOPC engineer in the 3<sup>rd</sup> quarter (Jul – Sep);
6. Provision of a cassava grinding machine, as stipulated alone by the OOPC engineer in the 2nd quarter (Apr – Jun);

My Community Liaison Officer and Projects personnel will liaise with you on the relevant projects stated herein.

Please acknowledge receipt of, and acceptance of, the terms and conditions stated in this letter on behalf of your Committee & Community by signing the enclosed duplicate copy and returning it to my office.

Kind regards,



Dr G. Hefer  
Managing Director

Cc; HRC, Projects Engineer, HSE Manager, CLO; Media Officer, Estate Superintendent



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24<sup>th</sup> November 2017

The Chairman  
Owan  
Ovia NE LGA  
Edo State

Dear Sir,

**PROJECTS BY OKOMU OIL PALM COMPANY PLC IN 2018 IN YOUR COMMUNITY**

Based upon our ongoing corporate social responsibility (CSR) programme and in line with our Free, Prior and Informed (FPIC) commitments with your community, we are pleased to confirm that the following projects requested by your community will be erected by our company as follows:

1. The issuance of 1 bursary valued at ₦90,000.00 each (as per the guidelines issued to your Committee by our Company previously);
2. Skills development for one year at a Training Centre for 2 youths (chosen as per the guidelines issued by the Company to your Committee previously);
3. Erection of a town hall, as stipulated by the OOPC engineer alone in the 2nd quarter (Apr – Jun);
4. A cassava grinding machine, as stipulated by the OOPC engineer alone in the 1st quarter (Jan – Mar);

My Community Liaison Officer and Projects personnel will liaise with you on the relevant projects stated herein.

Please acknowledge receipt of, and acceptance of, the terms and conditions stated in this letter on behalf of your Committee & Community by signing the enclosed duplicate copy and returning it to my office.

Kind regards,



Dr G. Hefer  
Managing Director

Cc: HRM, Projects Engineer, HSE Manager, CLO, Media Officer, Estate Superintendent

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24<sup>th</sup> November 2017

The Chairman  
Odighi  
Ovia NE LGA  
Edo State

Dear Sir,

**PROJECTS BY OKOMU OIL PALM COMPANY PLC IN 2018 IN YOUR COMMUNITY**

Based upon our ongoing corporate social responsibility (CSR) programme and in line with our Free, Prior and Informed (FPIC) commitments with your community, we are pleased to confirm that the following projects requested by your community will be erected by our company as follows:

1. The issuance of 1 bursary valued at ₦90,000.00 each (as per the guidelines issued to your Committee by our Company previously);
2. Grading of road, the distance and manner of grading as determined by the OOPC Engineer alone – 1<sup>st</sup> quarter (Jan – Mar);
3. Skills development for one year at a Training Centre for 2 youths (chosen as per the guidelines issued by the Company to your Committee previously);
4. Completion of a town hall, as determined by the OOPC engineer alone – 3<sup>rd</sup> quarter (Jul – Sep);
5. Fencing of the Enogie's Palace – 2<sup>nd</sup> quarter (Apr – Jun);

My Community Liaison Officer and Projects personnel will liaise with you on the relevant projects stated herein.

Please acknowledge receipt of, and acceptance of, the terms and conditions stated in this letter on behalf of your Committee & Community by signing the enclosed duplicate copy and returning it to my office.

Kind regards,



Dr G. Hefer  
Managing Director

Cc: HRM, Projects Engineer, HSE Manager, CLO, Media Officer, Estate Superintendent

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23 November 2017

The Chairman  
Udo Community Relations Committee  
Ovia SW LGA  
Edo State

Dear Sir,

**PROJECTS BY OKOMU OIL PALM COMPANY PLC IN 2018 IN YOUR COMMUNITY**

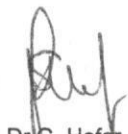
Based upon our ongoing corporate social responsibility (CSR) programme and in line with our Free, Prior and Informed (FPIC) commitments with your community, we are pleased to confirm that the following projects requested by your community will be erected by our company as follows:

1. The issuance of 5 bursaries valued at ~~N~~90,000.00 each (as per the guidelines issued to your Committee by our Company previously);
2. Skills development for one year at a Training Centre for 7 youths (chosen as per the guidelines issued by the Company to your Committee previously);
3. Grading of road, the time and manner of grading, as determined by the OOPC Engineer alone – 1<sup>st</sup> Quarter 2017 (Jan – Mar);
4. Canopies & chairs as determined by the OOPC Engineer alone – 1<sup>st</sup> Quarter 2017 (Jan – Mar);
5. 2 x 5 market stalls as determined by the OOPC Engineer alone – 2nd Quarter 2017 (Apr – Jun);
6. 4 household boreholes as determined by the OOPC Engineer alone – 1<sup>st</sup> Quarter 2018 (Jan – Mar); 2<sup>nd</sup> Quarter 2018 (Apr – Jun); 3rd Quarter 2018 (Jul – Sep) & 4<sup>th</sup> Quarter 2018 (Oct – Dec);

My Community Liaison Officer and Projects personnel will liaise with you on the relevant projects stated herein.

Please acknowledge receipt of, and acceptance of, the terms and conditions stated in this letter on behalf of your Committee & Community by signing the enclosed duplicate copy and returning it to my office.

Kind regards,



Dr. G. Hefer  
Managing Director

cc: HRM, Projects Engineer, HSE Manager, CLO, Media Officer; Estate Superintendent

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4<sup>th</sup> January 2019

The Chairman  
Owan  
Ovia NE LGA  
Edo State.

Dear Sir,

**PROJECTS BY OKOMU OIL PALM COMPANY PLC IN 2019 IN YOUR COMMUNITY**

Based upon our ongoing corporate social responsibility (CSR) programme and in line with our Free, Prior and Informed (FPIC) commitments with your community, we are pleased to confirm that the following projects requested by your community will be erected by our company as follows:

1. The issuance of 1 bursary valued at ₦90,000.00 each (as per the guidelines issued to your Committee by our Company previously);
2. Skills development for one year at a Training Centre for 2 youths (chosen as per the guidelines issued by the Company to your Committee previously);
3. The drilling of a semi industrial borehole as determined by OOPC engineer alone-3<sup>rd</sup> quarter 2019(Jul-Sept.);

My Community Liaison Officer and Projects personnel will liaise with you on the relevant projects stated herein.

Please acknowledge receipt of, and acceptance of, the terms and conditions stated in this letter on behalf of your Committee & Community by signing the enclosed duplicate copy and returning it to my office.

Kind regards,



Dr G. Hefer  
Managing Director

Cc: HRM, Projects Engineer, HSE Manager, CLO, Media Officer, Estate Superintendent



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4<sup>th</sup> January 2019

The Chairman  
Agbanikaka  
Ovia NE LGA  
Edo State

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2. Skills development for one year at a Training Centre for 2 youths (chosen as per the guidelines issued by the Company to your Committee previously);
3. The drilling of semi industrial borehole as determined by OOPC engineer alone-2<sup>nd</sup> quarter 2019(Apr-Jun.);
4. A market stores as determined by OOPC engineer alone-4<sup>th</sup> (Oct-Dec);

My Community Liaison Officer and Projects personnel will liaise with you on the relevant projects stated herein.

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4<sup>th</sup> January 2019

The Chairman  
Ekpan Community  
Uhunmwode LGA  
Edo State.

Dear Sir,

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2. Skills development for one year at a Training Centre for 2 youths (chosen as per the guidelines issued by the Company to your Committee previously);
3. A construction of corper's lodge (2018) 2<sup>nd</sup> phase as determined by OOPC engineer alone-2<sup>nd</sup> quarter 2019(Apr-Jun.);

My Community Liaison Officer and Projects personnel will liaise with you on the relevant projects stated herein.

Please acknowledge receipt of, and acceptance of, the terms and conditions stated in this letter on behalf of your Committee & Community by signing the enclosed duplicate copy and returning it to my office.

Kind regards,



Dr. G. Hefer  
Managing Director

Cc: HRM, Projects Engineer, HSE Manager, CLO, Media Officer, Estate Superintendent

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4<sup>th</sup> January 2019

The Chairman  
Odighi  
Ovia NE LGA  
Edo State.

Dear Sir,

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2. Skills development for one year at a Training Centre for 2 youths (chosen as per the guidelines issued by the Company to your Committee previously);
3. A borehole as determined by OOPC engineer alone-2<sup>nd</sup> quarter 2019(Apr-Jun.);
4. A lock-up market stalls as determined by OOPC engineer alone-4<sup>th</sup> quarter 2019(Oct-Dec);

My Community Liaison Officer and Projects personnel will liaise with you on the relevant projects stated herein.

Please acknowledge receipt of, and acceptance of, the terms and conditions stated in this letter on behalf of your Committee & Community by signing the enclosed duplicate copy and returning it to my office.

Kind regards,



Dr G. Hefer  
Managing Director

Cc: HRM, Projects Engineer, HSE Manager, CLO, Media Officer, Estate Superintendent

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4<sup>th</sup> January 2019

The Chairman  
Irhue Community  
Uhunmwode LGA  
Edo State.

Dear Sir,

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1. The issuance of 1 bursary valued at ₦90,000.00 each (as per the guidelines issued to your Committee by our Company previously);
2. Skills development for one year at a Training Centre for 2 youths (chosen as per the guidelines issued by the Company to your Committee previously);
3. The drilling of a semi industrial borehole as determined by OOPC engineer alone-2<sup>nd</sup> quarter 2019(Apr-Jun.);

My Community Liaison Officer and Projects personnel will liaise with you on the relevant projects stated herein.

Please acknowledge receipt of, and acceptance of, the terms and conditions stated in this letter on behalf of your Committee & Community by signing the enclosed duplicate copy and returning it to my office.

Kind regards,



Dr G. Hefer  
Managing Director

Cc: HRM, Projects Engineer, HSE Manager, CLO, Media Officer, Estate Superintendent



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4<sup>th</sup> January 2019

The Chairman  
Udo Community Relations Committee  
Ovia SW LGA  
Edo State

Dear Sir,

**PROJECTS BY OKOMU OIL PALM COMPANY PLC IN 2019 IN YOUR COMMUNITY**

Based upon our ongoing corporate social responsibility (CSR) programme and in line with our Free, Prior and Informed (FPIC) commitments with your community, we are pleased to confirm that the following projects requested by your community will be erected by our company as follows:

1. The issuance of 5 bursaries valued at ₦90,000.00 each (as per the guidelines issued to your Committee by our Company previously);
2. Skills development for one year at a Training Centre for 7 youths (chosen as per the guidelines issued by the Company to your Committee previously);
3. Grading of road, the distance and manner of grading as determined by the OOPC Engineer alone-1st quarter 2019(Jan-Mar);
4. A community town hall to the value size as determined by OOPC engineer alone-2nd quarter 2019(Apr-Jun);

My Community Liaison Officer and Projects personnel will liaise with you on the relevant projects stated herein.

Please acknowledge receipt of, and acceptance of, the terms and conditions stated in this letter on behalf of your Committee & Community by signing the enclosed duplicate copy and returning it to my office.

Kind regards,



Dr G. Hefer  
Managing Director

Cc: HRM, Projects Engineer, HSE Manager, CLO, Media Officer, Estate Superintendent

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4<sup>th</sup> January 2019

The Chairman  
Gbole-Uba Community  
Ovia SW LGA  
Edo State

Dear Sir,

**PROJECTS BY OKOMU OIL PALM COMPANY PLC IN 2019 IN YOUR COMMUNITY**

Based upon our ongoing corporate social responsibility (CSR) programme and in line with our Free, Prior and Informed (FPIC) commitments with your community, we are pleased to confirm that the following projects requested by your community will be erected by our company as follows:

1. The issuance of 2 bursaries valued at ₦90,000.00 each (as per the guidelines issued to your Committee by our Company previously);
2. Grading of road, the distance and manner of grading as determined by the OOPC Engineer alone-1st quarter 2019(Jan-Mar);
3. The drilling of two boreholes as determined by OOPC engineer alone-2nd quarter 2019(Apr-Jun) and 3<sup>rd</sup> quarter 2019(Jul-Sept.);
4. The furnishing of the newly built-modern town hall as determined by the OOPC Engineer alone-4<sup>th</sup> quarter(Oct-Dec.);

My Community Liaison Officer and Projects personnel will liaise with you on the relevant projects stated herein.

Please acknowledge receipt of, and acceptance of, the terms and conditions stated in this letter on behalf of your Committee & Community by signing the enclosed duplicate copy and returning it to my office.

Kind regards,



Dr G. Hefer  
Managing Director

Cc: HRM, Projects Engineer, HSE Manager, CLO, Media Officer, Estate Superintendent

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4<sup>th</sup> January 2019

The Chairman  
Gbelebu Community  
Ovia SW LGA  
Edo State.

Dear Sir,

**PROJECTS BY OKOMU OIL PALM COMPANY PLC IN 2019 IN YOUR COMMUNITY**

Based upon our ongoing corporate social responsibility (CSR) programme and in line with our Free, Prior and Informed (FPIC) commitments with your community, we are pleased to confirm that the following projects requested by your community will be erected by our company as follows:

1. The issuance of 2 bursaries valued at ₦90,000.00 each (as per the guidelines issued to your Committee by our Company previously);
2. Skills development for one year at a Training Centre for 5 youths (chosen as per the guidelines issued by the Company to your Committee previously);
3. A market stalls as determined by OOPC engineer alone-2nd quarter 2019(Apr-Jun);
4. A borehole for community town hall as determined by OOPC engineer alone-4th quarter 2019(Oct-Dec);

My Community Liaison Officer and Projects personnel will liaise with you on the relevant projects stated herein.

Please acknowledge receipt of, and acceptance of, the terms and conditions stated in this letter on behalf of your Committee & Community by signing the enclosed duplicate copy and returning it to my office.

Kind regards,



Dr G. Hefer  
Managing Director

Cc: HRM, Projects Engineer, HSE Manager, CLO, Media Officer, Estate Superintendent



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Edo State.

## PROJECTS BY OKOMU OIL PALM COMPANY PLC IN 2020 IN YOUR COMMUNITY

Based upon our ongoing corporate social responsibility (CSR) programme and in line with our Free, Prior and Informed (FPIC) commitments with your community, we are pleased to confirm that the following projects requested by your community will be erected by our company as follows:

1. The issuance of 2 bursaries valued at ₦90,000.00 each (as per the guidelines issued to your Committee by our Company previously);
2. Skills development for one year at a Training Centre for 3 youths (chosen as per the guidelines issued by the Company to your Committee previously);
3. The replacement of light bulbs (20 in number) (1<sup>st</sup> quarter);
4. Replacement of 7.5Kva genset (2<sup>nd</sup> quarter);

My Community Liaison Officer and Projects personnel will liaise with you on the relevant projects stated herein and what will be done on each of the projects.

Please acknowledge receipt of, and acceptance of, the terms and conditions stated in this letter on behalf of your Committee & Community by signing the enclosed duplicate copy and returning it to my office.

Dr G. Hefer  
Managing Director

Cc: HRM, Projects Engineer, HSE Manager, CLO, Media Officer, Estate Superintendent



**Lagos Office:**

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29<sup>th</sup> November, 2019

The Chairman  
Thru: Community Liaison Officer (CLO),  
Gbelebu Community  
Ovia SW LGA  
Edo State.

Dear Sir,

**PROJECTS BY OKOMU OIL PALM COMPANY PLC IN 2020 IN YOUR COMMUNITY**

Based upon our ongoing corporate social responsibility (CSR) programme and in line with our Free, Prior and Informed (FPIC) commitments with your community, we are pleased to confirm that the following projects requested by your community will be erected by our company as follows:

1. The issuance of 2 bursaries valued at ₦90,000.00 each (as per the guidelines issued to your Committee by our Company previously);
2. Skills development for one year at a Training Centre for 5 youths (chosen as per the guidelines issued by the Company to your Committee previously);
3. Furnishing of town hall as per the directives of the Project personnel (2<sup>nd</sup> quarter);
4. One new domestic borehole at Eto Camp (3<sup>rd</sup> quarter);
5. Refurbishment of 4 boreholes as per the directives of the Projects personnel (1<sup>st</sup> quarter to 4<sup>th</sup> quarter);

My Community Liaison Officer and Projects personnel will liaise with you on the relevant projects stated herein and the details for each of the projects.

Please acknowledge receipt of, and acceptance of, the terms and conditions stated in this letter on behalf of your Committee & Community by signing the enclosed duplicate copy and returning it to my office.

Kind regards,



Dr. G. Hefer  
Managing Director

Cc: HRM, Projects Engineer, HSE Manager, CLO, Media Officer, Estate Superintendent

Lagos Office:

Tel: 01-84446337

E-mail: [lagosoffice@okomunigeria.com](mailto:lagosoffice@okomunigeria.com)

Okomu – Udo, Ovia South West L.G.A

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23<sup>rd</sup> July, 2019

The Chairman  
Thru: Community Liaison Officer (CLO),  
Umopke Community  
Uhunmwode LGA  
Edo State

Dear Sir,

**PROJECTS BY OKOMU OIL PALM COMPANY PLC IN 2020 IN YOUR COMMUNITY**

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As we have done in the past, we request that your committee sends to us a letter requesting the areas and projects that they think our company can assist your community with in 2020. We also suggest that in 2020 your committee looks at the refurbishment and/or maintenance of some of the previously erected projects completed by Okomu in previous years which may now in need of an overhaul to bring them back to their former glory again. In this regard, Mr Kunle and Mr Alex will be coming to your community to discuss with you what formerly completed projects they feel could be refurbished by our company again. Once consensus has been reached, then you can include these refurbishments in your request list for next year and I will revert back to confirm what we can do for your community with both new and old projects in 2020.

Once your community has drawn up their list of projects, both old and new, please ensure that your completed list reaches me on or before 30<sup>th</sup> August, 2019 through the Community Liaison Officer assigned to your community.

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Kind regards,



Dr G. Hefer  
Managing Director

Cc: HRM, Projects Engineer, HSE Manager, Communications Officer, Estate Superintendent

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23<sup>rd</sup> July, 2019

The Chairman  
Thru: Community Liaison Officer (CLO) Ext. 2  
Oke-Irhue Community  
Uhunmwode LGA  
Edo State.

Dear Sir,

**PROJECTS BY OKOMU OIL PALM COMPANY PLC IN 2020 IN YOUR COMMUNITY**

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Kind regards,

  
Dr G. Hefer  
Managing Director

Cc: HRM, Projects Engineer, HSE Manager, Communications Officer, Estate Superintendent



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23<sup>rd</sup> July, 2019

The Chairman

Thru: Community Liaison Officer (CLO) Ext. 2

Owan Community

Ovia NE LGA

Edo State.

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Managing Director

Cc: HRM, Projects Engineer, HSE Manager, Communications Officer, Estate Superintendent



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The Chairman  
Thru: Community Liaison Officer (CLO),  
Uhiere Community  
Ovia NE LGA  
Edo State.

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Kind regards,



Dr G. Hefer  
Managing Director

Cc: HRM, Projects Engineer, HSE Manager, Communications Officer, Estate Superintendent



# ODIGHI COMMUNITY

Along Benin / Akure Road, Uhiere Ward, Ovia-North East L.G.A.,  
Via Benin City, Edo State.

25 – 01 – 2019

Dr. Graham Hefer  
Managing Director  
Okomu Oil Palm Com (PLC)  
Okomu – Udo

Dear Sir,

PROJECTS BY OKOMU OIL PALM COMPANY PLC IN 2019 IN ODIGHI COMMUNITY

Your letter dated 4<sup>th</sup> January 2019 about the above heading was received by us on the 17<sup>th</sup> January 2019. All the contents therein were understood. We thank you for the promises kept by your company.

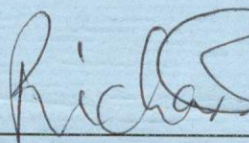
Please, we wish to bring to your notice that mention was not made about our Community Town Hall that is already ongoing as Phase One Renovation Project by your company.

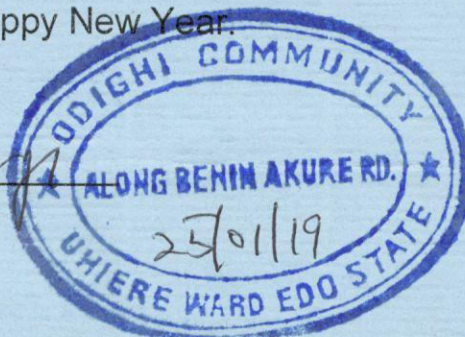
We are pleading that the Town Hall should please be completed before any other new project for the year 2019 is embarked upon by your company.

Your co-operation and understanding is highly solicited.

Our Best Regards

Once again we say Happy New Year.

  
Mr. Richard Amayo  
Projects Chairman



Cc HRM, Projects Engineer, HSE Manager, CLO, Media officer, Estate Superintendent



Lagos Office:

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The Chairman  
Thru: Community Liaison Officer (CLO) Ext. 2  
Odiguetue Community  
Ovia NE LGA  
Edo State.

Dear Sir,

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Once your community has drawn up their list of projects, both old and new, please ensure that your completed list reaches me on or before 30<sup>th</sup> August, 2019 through the Community Liaison Officer assigned to your community.

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Kind regards,

  
Dr G. Hefer  
Managing Director

Cc: HRM, Projects Engineer, HSE Manager, Communications Officer, Estate Superintendent

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23<sup>rd</sup> July, 2019

The Chairman  
Thru: Community Liaison Officer (CLO) Ext. 2  
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Ovia NE LGA  
Edo State.

Dear Sir,

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Dr G. Hefer  
Managing Director

Cc: HRM, Projects Engineer, HSE Manager, Communications Officer, Estate Superintendent



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23<sup>rd</sup> July, 2019

The Chairman  
Thru: Community Liaison Officer (CLO) Ext. 2  
Orhua Community  
Uhunmwode LGA  
Edo State.

Dear Sir

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Dr G. Hefer  
Managing Director

Cc: HRM, Projects Engineer, HSE Manager, Communications Officer, Estate Superintendent

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23<sup>rd</sup> July, 2019

The Chairman

Thru: Community Liaison Officer (CLO) Ext. 2

Agbinikaka Community

Ovia NE LGA

Edo State.

Dear Sir,

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Dr. G. Hefer  
Managing Director

Cc: HRM, Projects Engineer, HSE Manager, Communications Officer, Estate Superintendent



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23<sup>rd</sup> July 2019

The Chairman  
Thru: Community Liaison Officer (CLO),  
Gbelebu Community  
Ovia SW LGA  
Edo State

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Cc: HRM, Projects Engineer, HSE Manager, Communications Officer, Estate Superintendent

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23<sup>rd</sup> July, 2019

The Chairman  
Thru: Community Liaison Officer (CLO),  
Udo Community Relations Committee  
Ovia SW LGA  
Edo State

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Cc: HRM, Projects Engineer, HSE Manager, Communications Officer, Estate Superintendent



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23<sup>rd</sup> July, 2019

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Thru: Community Liaison Officer (CLO),  
Inikorogha Community  
Ovia SW LGA  
Edo State.

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23<sup>rd</sup> July, 2019

The Amakosiwe  
Thru: Community Liaison Officer (CLO),  
Ofunama Community  
Ovia SW LGA  
Edo State.

Dear Sir,

**PROJECTS BY OKOMU OIL PALM COMPANY PLC IN 2020 IN YOUR COMMUNITY**

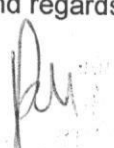
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As we have done in the past, we request that your committee sends to us a letter requesting the areas and projects that they think our company can assist your community with in 2020. We also suggest that in 2020 your committee looks at the refurbishment and/or maintenance of some of the previously erected projects completed by Okomu in previous years which may now in need of an overhaul to bring them back to their former glory again. In this regard, Mr Kunle and Mr Alex will be coming to your community to discuss with you what formerly completed projects they feel could be refurbished by our company again. Once consensus has been reached, then you can include these refurbishments in your request list for next year and I will revert back to confirm what we can do for your community with both new and old projects in 2020.

Once your community has drawn up their list of projects, both old and new, please ensure that your completed list reaches me on or before 30<sup>th</sup> August, 2019 through the Community Liaison Officer assigned to your community.

Please acknowledge receipt of, and acceptance of, the terms and conditions stated in this letter on behalf of your Committee & Community by signing the enclosed duplicate copy and returning it to my office.

Kind regards,



Dr G. Hefer  
Managing Director

Cc: HRM, Projects Engineer, HSE Manager, Communications Officer, Estate Superintendent



**Lagos Office:**

**Tel: 01-84446337**

**E-mail: [lagosoffice@okomunigeria.com](mailto:lagosoffice@okomunigeria.com)**

**Okomu – Udo, Ovia South West L.G.A  
P.M.B. 1449, Benin City.**

**Edo State, Nigeria.**

**E-Mail: [info@okomunigeria.com](mailto:info@okomunigeria.com), [compsec@okomunigeria.com](mailto:compsec@okomunigeria.com)**

**Web: [www.okomunigeria.com](http://www.okomunigeria.com)**

23<sup>rd</sup> July, 2019

The Chairman  
Thru: Community Liaison Officer (CLO) Ext. 2  
Ekpan Community  
Uhunmwode LGA  
Edo State.

Dear Sir,

**PROJECTS BY OKOMU OIL PALM COMPANY PLC IN 2020 IN YOUR COMMUNITY**

Based upon our ongoing corporate social responsibility (CSR) programme and in line with our Free, Prior and Informed (FPIC) commitments with your community, we are pleased to inform you that our company is ready to partner you once again in 2020.

As we have done in the past, we request that your committee sends to us a letter requesting the areas and projects that they think our company can assist your community with in 2020. We also suggest that in 2020 your committee looks at the refurbishment and/or maintenance of some of the previously erected projects completed by Okomu in previous years which may now in need of an overhaul to bring them back to their former glory again. In this regard, Mr Kunle and Mr Alex will be coming to your community to discuss with you what formerly completed projects they feel could be refurbished by our company again. Once consensus has been reached, then you can include these refurbishments in your request list for next year and I will revert back to confirm what we can do for your community with both new and old projects in 2020.

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Kind regards,



Dr G. Hefer  
Managing Director

Cc: HRM, Projects Engineer, HSE Manager, Communications Officer, Estate Superintendent

**Lagos Office:**

**Tel: 01-84446337**

**E-mail: lagosoffice@okomunigeria.com**

**Okomu – Udo, Ovia South West L.G.A**

**P.M.B. 1449, Benin City.**

**Edo State, Nigeria.**

**E-Mail: [info@okomunigeria.com](mailto:info@okomunigeria.com), [compsec@okomunigeria.com](mailto:compsec@okomunigeria.com)**

**Web: [www.okomunigeria.com](http://www.okomunigeria.com)**

23<sup>rd</sup> July, 2019

The Chairman  
Thru: Community Liaison Officer (CLO),  
Madagbayo Community  
Ovia SW LGA  
Edo State.

Dear Sir,

**PROJECTS BY OKOMU OIL PALM COMPANY PLC IN 2020 IN YOUR COMMUNITY**

Based upon our ongoing corporate social responsibility (CSR) programme and in line with our Free, Prior and Informed (FPIC) commitments with your community, we are pleased to inform you that our company is ready to partner you once again in 2020.

As we have done in the past, we request that your committee sends to us a letter requesting the areas and projects that they think our company can assist your community with in 2020. We also suggest that in 2020 your committee looks at the refurbishment and/or maintenance of some of the previously erected projects completed by Okomu in previous years which may now in need of an overhaul to bring them back to their former glory again. In this regard, Mr Kunle and Mr Alex will be coming to your community to discuss with you what formerly completed projects they feel could be refurbished by our company again. Once consensus has been reached, then you can include these refurbishments in your request list for next year and I will revert back to confirm what we can do for your community with both new and old projects in 2020.

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Please acknowledge receipt of, and acceptance of, the terms and conditions stated in this letter on behalf of your Committee & Community by signing the enclosed duplicate copy and returning it to my office.

Kind regards,




Dr G. Hefer  
Managing Director

Cc: HRM, Projects Engineer, HSE Manager, Communications Officer, Estate Superintendent


## **APPENDIX E**

### **Staff Training and Development Planning**

		Revision: 0
	<b>FORM</b> <b>TRAINING PROGRAMME</b>	Date: 06/06/2017
	Reference <b>TRP – ADM 09.1</b>	Page 1 of 2


### **IN-PLANT TRAINING PROGRAMMES FOR 2019**

S/N	Course Title	Organizer	Duration	Date	Place	No of Batches	Status
1	The Community, Forest and Sustainability	Okomu	1 day	April 3	Okomu	1	Done
2	RSPO (Contractors / Staff)	HSE	1 day	April 1 - 19	Okomu	15	Done
3	Works ethics, Attitudinal change and Time Management	M. Y. Kachichi	1 day	April 29 – June	Okomu	30	Done
4	Successful Retirement Course	ITF	1 day	June 10	Okomu	1	Done
5	Issues in Gender Policies	UNIBEN	1 days	June 11	Okomu	1	Done
6	Perkins 4000 Series Control / Application Engineers training	ITF	2 days	June 12 - 13	Okomu	1	Done
7	Supervisory Management skill	Freeman Integrated Services Ltd	2 days	June 17 - 20	Okomu	2	Done
8	Advanced Chemical / Oil Spill Management	Safety Consult Ltd	2 days	June 24 - 27	Okomu	2	Done
9	First Aid Training	Red Cross	1 days	July 2	Okomu	1	
10	ISO 45001: 2018 Training	HSE	1 day		Okomu	1	
11	Workplace Safety Training	HSE	1 day	July 3 - 23	Okomu	15	
12	Supply Chain and Traceability	HSE	1 day	-	Okomu	-	Done
13	Training On Electrical Controls / Wiring on Wheel loader / Grader (Toyota Hilix) – Toyota / Mitsubishi electronic troubleshooting	Mandillas	2 days	July 24 - 5	Okomu	1	Done
14	Labor Laws and Human Rights	Bar. Osazee	2 days	July 29 – Aug. 1	Okomu	2	Done
15	Boiler and Turbine Handling Techniques	Hodskey Consultants	2 days	Aug. 3 – 4 (Weekend)	Okomu	1	Done
16	Advanced Excel Training	Freeman Integrated Services Ltd	2 days	Aug. 5 - 13	Okomu	3	Done

		Revision: 0
	<b>FORM</b> <b>TRAINING PROGRAMME</b>	Date: 06/06/2017
	Reference <b>TRP – ADM 09.1</b>	Page 2 of 2

17	Project Monitoring & Evaluation & AutoCAD 3D & Software in Map Creation	Freeman Integrated Services Ltd	2 days	Aug. 14 - 17	Okomu	2	Done
18	Training on Tractor General Operation and Safety (Tractor Operators)	ITF	2 days	Aug. 19 - 22	Okomu	2	Done
19	Maintenance / Repair of Modern Air Conditioner (Package Unit) and Refrigerator	Ampo Tech.	2 days	Aug. 26 - 27	Okomu	1	Done
20	Overhead H/T Line & Substation Maintenance (BEDC)	The Real Fep and Co. Nig. Ltd	4 days	Sept. 2 - 5	Okomu	2	Done
21	Principles of Operating Machine, Unsafe act and unsafe condition	Safety Consult Ltd	2 days	Sept. 9 - 17		3	Done
22	Electrical Control Programming on PLC and its trouble Shooting (Mill Electrician)	Hodskey Consultant	2 days	Sept. 14 – 15 (Weekend)	Okomu	1	Done
23	The Community, Forest and Sustainability	Okomu	1 day	Nov. 27	Okomu	1	Done
	<b><u>Extension 2</u></b>						
24	Time & Priority Management	M. Y. Kachichi	2 days	Sept. 9 - 12	Ext. 2	2	Done
25	Supervisory Skills Training	M. Y. Kachichi	2 days	Sept. 16 - 19	Ext. 2	2	Done




			Revision: 0
	<b>FORM</b> <b>TRAINING PROGRAMME</b>		Date: 06/06/2017
			Page 1 of 3
Reference	<b>TRP – ADM 09.1</b>		


### **IN-PLANT TRAINING PROGRAMMES FOR 2020**

S/N	Course Title	Organizer	Duration	Date	Place	No of Batches	Status
1	The Land Use Act:- Allocation and re-dress	Okomu	1 day	February 28	Okomu	1	Done
2	Montessori Training for Teachers	Axiom Learning Solution Ltd.	2 days	August 11 - 12	Okomu	1	Done
3	First Aid Training	Red Cross	1 day	May 20	Okomu	1	Done
4	Successful Retirement Course	Aibangbee Chambers	2 days	May 21 - 22	Okomu	1	
5	Issues in Gender Policies	Prof. Edosomwan UNIBEN	1 day	June 16	Okomu	1	
6	Supervisory Management Skill	M. Y. Kachichi	2 days	July 16 - 23	Okomu	3	Done
7	Chemical / Oil Spill Management	Safety Consult Ltd	2 days	Aug 31 – 3 Sept	Okomu	2	Done
8	Advanced Excel Training	Freeman Integrated Services Ltd	2 days	June 2 - 9	Okomu	3	Done
9	Project Monitoring & Evaluation & AutoCAD 3D & Software in Map Creation	Freeman Integrated Services Ltd	2 days	June 10 - 11	Okomu	1	Done
10	Industrial Safety and Accident Prevention (Road Safety for Drivers)	Notek Business Resource	2 days	July 7 - 10	Okomu	2	Done
11	Bearing Maintenance, monitoring Machine Dismounting.	Applied Eng. Tech. Initiative Ltd.	2 days	June 6 – 7 (Weekend)	Okomu	1	Done
12	Operation and Principles of Hydraulic Tools	ITF	2 days	June 13 – 14 (Weekend)	Okomu	1	
13	Pump Maintenance & Repairs Operations	Applied Eng. Tech. Initiative Ltd.	2 days	June 20 – 21 (Weekend)	Okomu	1	Done
14	Role of Internal Audit in Corporate Governance	Atu Omimi-Ejour Osaretin & Co. (Chartered Acct)	2 days	July 9 - 10	Okomu	1	Done
15	Industrial Electronics Practical demonstration of repairs of Panel, A/C Inverters, Current transmitter and Electronic modulating valves	Hodskey Consultant	2 days	August 29 – 30 (Weekend)	Okomu	1	Done
16	Turbine Principles and Operations Steam/Boiler	Hodskey Consultant	2 days	August 22 – 23 (Weekend)	Okomu	1	Done



						Revision: 0
	<b>FORM TRAINING PROGRAMME</b>					Date: 06/06/2017
	Reference	<b>TRP – ADM 09.1</b>				Page 2 of 3


17	Welding and Fabrication and Arc and Gas Welding	ITF	2 days	July 13 – 14 (Weekend)	Okomu	1	
18	Training on Toyota Hilix – Toyota Mitsubishi electronic troubleshooting	Mandilas	2 days	July 27 - 28	Okomu	1	
19	Training on Calibration and Programming “SIS” & Hydraulics	Sam. O.	2 days	August 6 - 7	Okomu	1	Done
20	Safety and Abuse of Machines	Sam. O.	2 days	Aug. 4 – 13	Okomu	4	
21	Training on Tractor General Operation and Safety & including hitching and care implements	ITF	2 days	Aug. 17 - 18	Okomu	2	
22	Training on Maintenance / Repair of Inverter Air Conditioner (Package Unit) and Froze free Refrigerator repair/maintenance	Ampo Tech.	2 days	Aug. 4 - 5	Okomu	1	Done
23	Overhead H/T Line & Substation Maintenance and Transformer testing.	Ese Tech. Nig.	4 days	Aug. 18 - 21	Okomu	1	Done
24	Modern Furniture Technique	Red Oak	2 days	Aug. 18 – 19	Okomu	1	Done
25	Numerical Competence	M. Y. Kachichi	2 days	Sept. 3 - 10	Okomu	3	
26	Emergency Plan and Exercise	HSE	1 day		Okomu	-	Done
27	Chemical Handling + Mixing	All Workers (HSE)	1 day	-	Okomu		Done
28	Personal Protective Equipment PPE Waste Management Safe Workplace Induction Training on RSPO standards Training on standards and certificates (ISO, OHSAS,...) excluding RPSO Fire Training Environmental sensitization Development & Assessment of Key Performer Indicator training	Department		-	Okomu		Done
29	Prunning Fertilizer Training	Department	1 day	-	Okomu		Done

		Revision: 0
	<b>FORM</b> TRAINING PROGRAMME	Date: 06/06/2017
	Reference <b>TRP – ADM 09.1</b>	Page 3 of 3

	Pest Control Phytosanitary						
30	Employee Code of Conduct Labor Laws and Human Rights Communication	HRD	1 day		Okomu		Done
31	Health Sensitization	Clinic	1 day		Okomu		
32	Practical Training on Mill / Factory Operation	Department	1 day		Okomu		Done
33	Review and recap of SOP	Department	1 day		Okomu		Done
34	The Land Use Act:- Allocation and re-dress	Ojo Chambers	1 day	November	Okomu	1	
	<b>Extension 2</b>						
35	Supervisory Training	M. Y. Kachichi	2 days	Sept. 21 - 24	Ext. 2	2	Done

## **APPENDIX F**

### **Policies**

	Document title	Revision: 1
	<b>OKOMU OIL PALM COMPANY PLC</b>	Date: 11/06/2020
	<b>ENVIRONMENTAL POLICY</b>	Page 1 of 1

#### 1.0 Policy Statement

OkomuOilPalm Company(OOPC) recognizes the value, importance and necessity of sustainably managing its operations such that the present needs of society are met without compromising the ability of future generations to meet their own needs and enjoy the same resources we have today.

#### 2.0 Scope

This policy applies to all employees contractors (including temporary contractors and third party staff) of OOPC.

#### 3.0 Guidelines

OOPC is committed to minimizing the environmental impact of its operations and in implementing this policy will:

- Comply with all applicable environmental management laws and obligations; and other environmental requirements to which OOPC Subscribes.
- Implement and maintain an Environmental Management System across its global operations, conforming to the requirements of ISO 14001, as well as other relevant external certifications criteria and OOPC Standard Operating Procedures and Best Practices;
- Achieve continuous environmental improvement with objectives and targets so as to minimize our environmental footprint;
- Minimize or prevent land, air and water pollution through reduced use of chemical resource conservation, waste reduction, recycling and reuse and proper waste disposal in every area of activity;
- Prevent soil erosion and degradation through adoption of best practice in agricultural management;
- Minimize impacts on biodiversity across all aspects of our operations;
- Communicate and promote this Environmental Policy with the aim of ensuring that both employees (at all levels and functions of the organization) and business partners (including suppliers, contractors, joint venture partners and smallholders) are aware of the environmental impacts of OOPC activities as well as their individual obligations;
- Educate and train employees on environmental and related issues; and encourage their participation and cooperation to minimize adverse impact and protect the environment;
- Support our joint venture partners and small holders to adopt and implement these principles; and
- Periodically review this Environmental Policy to ensure it remains relevant and applicable to our business.
- Implementation of our GHG Emission Reduction Policy.

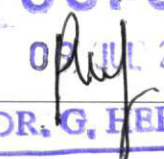
#### 4.0 Record of Approval

Task	Name/signature	Job title	Date
Approved by	Dr. Graham Hefer	Managing Director	10 JUL 2020 DR. G. HEFER

MANAGING DIRECTOR  
OOPC  
10 JUL 2020  
DR. G. HEFER

All drivers/operators must always take note of the following:

1. The maximum speed limit on all of Okomu's plantation roads and those connecting Okomu to Extension 1 is **40km/h** for vehicles and **30km/h** for lorries.
2. Speed limits for vehicles within residential houses is **10km/h** and school areas is **5km/h**
3. This speed limit can be seen on warning signs displayed on these roads.
4. Drivers/operators are also to obey all traffic laws applicable in Nigeria, including wearing seat belts whether or not they are on public or private Okomu roads.
5. In addition, the speed limiter which is fitted according to Nigerian law on vehicles is set at this speed (between **45km/h** to **100km/hr**) to comply with these standard regulations.
6. Drivers/operators are not permitted to tamper with, disconnect/connect the speed limiters at any time at the risk of a serious sanction or even termination/removal from the company and/or charges for any damages incurred.
7. Only the Workshop Manager is permitted to alter the speed of the speed limiter. Consequently, drivers/operators should contact their direct superior authority for permission in this regard.
8. Any person captured on satellite camera over speeding will face serious sanction by Management.
9. All drivers/operators shall have valid driver's licenses.
10. All drivers/operators shall sign off that they have read and understood OOPC Vehicle SOP and all applicable rules pertaining to driving OOPC vehicles as contained in the Vehicle SOP.

Task	Name	Job title	Signature/Date
Authorized by	Dr. Graham Hefer	Managing Director	 <b>DR. G. HEFER</b> 09 JUL 2020



### 1.0 Policy Statement

Okomu Oil Palm Company is committed to providing a safe and healthy working environment for our workers and stakeholders. We believe that all incidents and occupational illnesses are preventable, and we will work relentlessly to improve our safety performance towards zero incidents.

This requires us to work towards ensuring that we take all practicable steps to protect people involved in OOPC operations from harm. Our goal is to send everyone home safely every day.

### 2.0 Scope

This policy applies to all employees contractors (including temporary contractors and third party staff) of OOPC.

### 3.0 Guidelines

This policy can be done by:

- The ongoing implementation of our Integrated Management System Policy.
- Development and implementation of Minimum Standards for Safety, Environment and Process Safety.
- Ongoing development of the global IMS reporting platform and the continued development of an open reporting culture.
- Seeking continuous improvement to health and safety performance through setting annual objectives, targets, KPIs and focus areas, measurement of progress against our goals and communication to our stakeholders.
- Running an internal audit program and expanding existing audit programs.
- Commitment to provide safe and healthy working conditions for the prevention of work-related injury and ill health and which is appropriate to the purpose, size and context of OOPC, and to the specific nature of its OH&S risks and OH&S opportunities, while engaging our people to build and maintain a safe workplace.
- Development and delivery of training and education material to improve workers skills and awareness of IMS requirements and practices.
- Adhering to workers' complaints, and giving workers the ability to remove themselves from work situations that they consider present an imminent and serious danger to their life or health, as well as the arrangement for protecting them from undue consequences for doing so.
- Complying with all local and national legislations, and other requirements.
- Investigate all incidents to the root cause and make Corrective and Preventive Action Plans to avoid reoccurrence.
- Commitment to eliminate hazards and reduce OH&S risks
- Regular monitoring of PPE compliance and safety hazardous within the workplace.
- Commitment to consultation and participation of workers.

This policy is to be read in conjunction with the:

- High Risk Assessment- GP08
- Environmental Policy
- Incident and Hazard Reporting- GP18
- Safe Work Permit- GP20
- Boiler Room Operation- GP29 (Oil mill and Rubber factory)
- Emergency Preparedness and Response- GP12


### 4.0 Responsibility

- The HSE Manager shall ensure implementation and monitoring of this policy.

### 5.0 Record of Approval

Task	Name/signature	Job title
Approved by	Dr. Graham Hefer	Managing Director



	Document title	Revision: 1
	<b>OKOMU OIL PALM COMPANY PLC</b>	Date: 01/04/2020
	<b>CHILD LABOUR POLICY</b>	Page 1 of 1

### 1.0 Objective

OOPC does not condone the use of any child labour in any form whatsoever, by any person, company or institution, as defined in the International Labour Organization's Convention on Child Labour, and in the Nigerian Labour Act.

### 2.0 Scope

This policy is applicable to all employment processes in OOPC, contractors, and third party contract workers, or any company and/or institution that do business with OOPC.

### 3.0 Definitions

Child Labour: is defined as the employment of a child in business or industry in violation of Nigerian Federal statutes prohibiting the employment of children under a specified age. The Nigerian Labour Act 2004, as amended, classifies a child as a 'young person' under the age of fifteen (15) years.

### 4.0 Guidelines

- OOPC shall always comply with all relevant and applicable National labour regulations and principles relating to the protection, welfare, health and safety of children.
- No person deemed to be a child, as defined herein, shall be employed on any OOPC sites of operations.
- Furthermore, OOPC shall ensure that all contractors, companies and or organizations of any kind engaged by OOPC on the premises strictly abide by this policy.
- OOPC shall comply with the Child Protection Act of Nigeria (2004), as amended, to ensure the protection of all children against all forms of abuse, and the Employment Rights Act of Nigeria (2004), as amended, which prohibits the employment of any persons aged below 16. OOPC also, subscribes to the Education Act (2004) of Nigeria, as amended, which provides for compulsory education of all children up to the age 15. Article 3 of International Labour Organization (ILO) Minimum Age Convention 1973 (No. 138), states that the minimum age for admission to any type of employment or work which by its nature or the circumstances in which it is carried out is likely to jeopardise the health, safety or morals of young persons shall not be less than 18 years. Therefore, due to the various stipulations between Nigeria Labour law and ILO, the minimum age for employment in OOPC is 18.
- OOPC shall ensure proper implementation and monitoring this policy (as per OOPC's Child Labour Procedure).
- This policy will be communicated to all workers, staff, contractors, third parties, visitors and suppliers, or anyone who does business with OOPC (as per OOPC communication procedure GP10).

### 5.0 Record of Approval

Task	Name/signature	Job title	Date
Approved by	Dr. Graham Hefer	Managing Director	<div data-bbox="1052 1751 1435 1986" data-label="Text"> <p>MANAGING DIRECTOR OOPC 09 JUL 2020 DR. G. HEFER</p> </div>



## 1.0 Policy Statement

The Okomu Oil Palm Company (OOPC) is committed to demonstrating the highest level of regard for business ethics, environmental practices, and full compliance with all applicable laws pertaining to them.

## 2.0 Scope

This policy is applicable to all stakeholders doing business with, or who are on the premises of OOPC at any time.

## 3.0 Definition

Code of ethics: A written set of guidelines issued by an organization to its staff, management and stakeholders to help them conduct their actions in accordance with its primary values and ethical standards.

## 4.0 Guidelines

OOPC is committed to:

- Complying with all international and national legislation, regulations, and OOPC's own policies in conducting its business.
- Timely, accurate and truthful disclosure of reports and documents filed with or submitted to regulators, and in other public communications made by OOPC.
- Using its funds and assets for lawful corporate purposes only, and to maintain OOPC's financial integrity.
- Prohibiting all forms of corruption, bribery and fraudulent use of funds and resources among all parties working for or on behalf of OOPC.
- OOPC complies with the United Nations Convention against Corruption, Article 12, which prevents corruption involving the private sector.
- Prohibiting the employment of all forms of involuntary or underage labour in the production of goods and services.
- Fair and appropriate disciplinary practices and recognition of the entitlement of all individuals to be treated equitably with dignity and respect.
- Advocate the right of its employees' to freedom of association and to maintain a workplace free from discrimination, physical or verbal abuse, threats, intimidation and harassment, whilst embracing diversity and respecting the personal dignity, rights and privacy of every employee.
- Provide a safe and healthy work environment for its employees and managers and encourage adherence to environmental, safety and health rules (as per OOPC Environmental and Safety Aspect procedure GP08).
- Protect its assets and ensure their efficient use by all persons working for or on behalf of OOPC.
- Discourage its employees from participating in any decision in which they may be unable to maintain professional objectivity due to conflicts of interest.
- Engage only in fair and open competition, by treating competitors, suppliers, customers, and colleagues with integrity.
- Encourage its employees to maintain the confidentiality of information entrusted to them, except when disclosure is authorized by the MD or required by laws or regulations as contained in the Freedom of Information Act 2011 Laws of the Federation of Nigeria.
- Corporate/ promotional gifts and hospitality on acceptance by staff & Management valued N20, 000 and above must be declared through the HOD/MD.
- OOPC do not make Political contributions of any form whilst carrying out its business operations with individuals, government agencies, NGOs, etc.
- OOPC will give charitable donations and sponsorships in line with its Procedure GP35 Corporate Social Responsibility
- OOPC do not comply any form of unethical conduct such as charging fees to workers, recovering cost of recruitment and transportation against workers' wages, receiving gifts and commissions from labour intermediaries, contractors, suppliers or other interested parties.
- In resolving conflicts, OOPC will avoid escalation of conflicts and prohibiting the usage of dogs and paramilitary in the organization.
- Communicated to all persons working for or on behalf of OOPC (as per OOPC communication procedure GP10) and enforce its strict compliance.

The HSE Manager shall implement, monitor and document the provisions of this code.


The Managing Director confirms the commitment and support, along with that of all stakeholders, employees and those working on behalf of the company, to the above policy statement and the effective application and continual compliance with this code of ethics.

## 5.0 Record of Approval

Task	Name/signature	Job title
Approved by	Dr. Graham Hefer	Managing Director





	Document title	Revision: 2
	<b>OKOMU OIL PALM COMPANY PLC</b>	Date: 13/08/20
	<b>DRUG AND ALCOHOL POLICY</b>	Page 1 of 1

## 1.0 Policy Statement

OOPC is committed to providing a safe and healthy drug, alcohol and substance free workplace that enables OOPC staff, contractors, sub-contractors and third party contractors (defined as stakeholders) to perform at their most productive levels. Consistent with that commitment, the company has developed this policy statement regarding drug and alcohol use, and the testing thereof, to minimise its effects in the workplace.

## 2.0 Objective

The policy is designed to maintain a work place free from drugs and alcohol. The drug and alcohol policy covers illegal or illicit drugs, alcohol and other controlled substances. These will be referred to as prohibited substances within OOPC's work environment. The goal is to establish and maintain a work environment that is free from all drugs, alcohol and/or other controlled substances.

## 3.0 Scope

This policy is applicable to all stakeholders doing business with OOPC, during business hours.

Stakeholders shall be obliged to undergo random drug/alcohol tests at any time that OOPC requests them to do so. Refusal to undergo any test will lead to the immediate termination or loss of contract by the stakeholder(s) concerned.

## 4.0 Legislation

### **Driving**

0.00% is maintained for ALL driving activities within OOPC concessions during working hours. However as regards the Nigerian Highway Code section 2.6f, maximum permissible blood alcohol level for driving on the highway ONLY is 0.5gms per liter or 0.05% of Blood Alcohol Concentration (BAC)

## 5.0 Definitions

5.1 **Alcohol Dependence** is defined as: The habitual drinking of intoxicating liquor by a stakeholder, whereby the stakeholder's ability to perform his/her duties are impaired, and/or his/her attendance at work is negatively affected, and/or they endanger the safety of others.

5.2 **Drug Dependence** is defined as: The habitual taking of drugs by a stakeholder other than a drug prescribed as medication, resulting in a stakeholder's ability to perform his/her duties being impaired, and/or their attendance at work is negatively affected, and/or they endanger the safety of others.

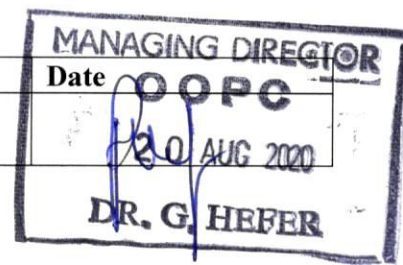
## 6.0 Guidelines

Any stakeholder, who violates this policy, may be subjected to one or all of the following measures:

- Disciplinary action, including termination of employment or contract.
- Violation by contractors or third party contractors will result in their removal from the workplace and their contract terminated.
- In the absence of a contractor's written policy, OOPC will administer appropriate elements of this policy as deemed necessary.
- This policy will be communicated to all stakeholders involved in any way with OOPC, as per OOPC Communication Procedure-GP 10.

## 7.0 Record of Approval

Task	Name/signature	Job title
Approved by	Dr. Graham Hefer	Managing Director



## **EMERGENCY RESPONSE/CONTINGENCY PLAN FOR FIRE, SECURITY THREATS, MEDICAL, CHEMICAL SPILL, AND ELECTRIC SHOCK**

### **1.0 Purpose/Scope**

This procedure defines the framework for preparing for and responding to emergencies involving fire, security threats, chemical spill, medical emergency and electric shock.

### **2.0 Workplace/Activities Affected**

All workplace and departments

### **3.0 Definitions**

3.1 Fire and Chemical spill are defined as materials which when released into the environment, or because of their properties and the way they are used, could cause harm to workers, from fires and explosions. Dangerous substances include petrol (PMS), liquefied natural gas (LPG), paints, chemicals and solvents.

3.2 Security threat is defined as any incident or confrontation that jeopardizes property and lives, which includes, but not limited to: militants and civil unrest.

3.3 Emergency Response-actions taken by personnel within the work area in an effort to mitigate the impact of an incident on the public and the environment.

3.4 TOC-Tactical Operations Centre: a communication Centre that coordinate all crisis activities.

3.5 Electric shock is defined as a sudden discharge of electricity through a part of the human body.

### **4.0 Exclusions**

None

### **5.0 Procedures**

In the circumstances:

#### **5.1 For fire and security threats:**

- The Person who has observed any danger must alert employees by sounding appropriate alarms. The alarm must be heard, seen or otherwise perceived by everyone in the workplace.
- The person must notify security/TOC on the emergency numbers posted in various locations in the work place, inform TOC of the situation fire/incident. If it's a fire, inform TOC of the location, injuries, potential fire hazards and risk (oil drums, paints, banga product, rubber, chemicals and gas bottles etc). TOC will brief fire service. If it is an incident, inform TOC of the type of incident, location description of suspect(s) type of weapon (if it involves a weapon) and any injuries at the scene.
- TOC will dispatch the appropriate authority to the scene, along with medical staff, if safe to do so, at the time.
- HSE representatives, will assist with evacuation of the worker(s) from the building.
- All workers must report to their muster point.
- HSE representatives will assist personnel with special needs or disabilities who may need help evacuating and assign one or more people, including backup personnel, to help them.
- Staff should ensure all windows and doors are closed, and all electrical appliances are switched off and unplugged before evacuating the building
- HSE representatives will do a head count to verify if anyone is missing, with the assistance of a contractor for their workers, if any are in that department.
- HSE representatives should ensure that no body returns to the factory/building until it is cleared by the appropriate authority.

#### **5.2 For chemical spill:**

##### **For small spill:**

- First person to observe a spill must use the appropriate spill kit to control the spill.

##### **For large spill:**

- The first person to observe the spill must contact their supervisor, who will notify HSE to dispatch the Spill Response team, to see a perimeter to contain the spill.
- The supervisor must notify TOC, for emergency assistance (if needed).
- HSE will notify The Federal Ministry of Environment.
- The Federal Ministry of Environment will assist in the disposal of waste and,
- Decontaminate the area and affected place.

#### **5.3 For medical emergency;**

- The person who has observed any emergency must notify TOC on the emergency numbers posted in various locations in the work place, inform TOC of the type of Emergency.
- TOC will notify and dispatch medical staff and ambulance to the scene.

#### **5.4 For electric shock;**

- First person to observe a shock situation should turn off the source of electricity, if possible, if not, notify the Estate department and contact TOC to dispatch the appropriate authority.
- Keep the shocked person warm, lying down, and still until the ambulance arrives.

### **6 Emergency numbers**

0813 463 1183 (TOC) – 24hrs

### **7 Record of Approval**

Task	Name/signature	Job title
Approved by	Graham Hefer	Managing Director





	Document title	Revision: 1
	<b>OKOMU OIL PALM COMPANY PLC</b>	Date: 11/06/2020
	<b>FIRE PREVENTION AND MANAGEMENT</b>	Page 1 of 1

## 1.0 Policy Statement

The prime purpose of this policy is to ensure maximum fire prevention within OOPC concessions and around its border lines.

## 2.0 Scope

The policy is applicable to all OOPC concessions, including those subsidiaries and third party suppliers.

## 3.0 Definitions

3.1 Dry Season-Period at the time of the year with little or no amount of rain fall.

3.2 TOC-Tactical Operation Centre

## 4.0 Guidelines

- OOPC has taken on an active role in mitigating the occurrence of haze in the region, through our commitment to no deforestation.
- This policy is supplemented with community education and awareness campaigns, as well as multi-stakeholder partnership to entrench sustainable practices throughout the industry.

### NO DEFORESTATION

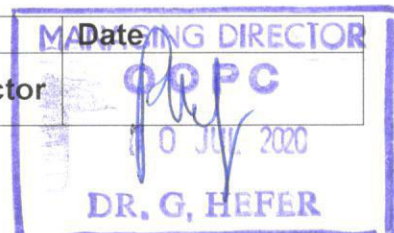
- One of the key tenets of the No Deforestation pillar is a strict Zero Burning Policy.
- We do not tolerate the use of fire in land preparation or development.
- Mechanical methods are employed in land development and wood debris is left to decompose. This returns nutrients back into the land and reduces the need for inorganic fertilisers, thereby also reducing the greenhouse gas footprint.


### ACTIVE FIRE MONITORING AND RAPID RESPONSE

- TOC (TOC 2 for Extension 2) is notified of any sign/fire sighted within OOPC concession and boundary areas through the emergency number.
- OOPC has a 24/7 fire monitoring system in place during dry season to alert us of fires in and around our concessions.
- OOPC has a well-established fire prevention and suppression programme to minimise the incident and impact of fire and haze.
- All OOPC concession is equipped with fire-fighting infrastructure and equipment, and staffed with an on-site fire brigade.
- Fire service personnel are trained to be vigilant and prepare to respond to fire incidences quickly and decisively.
- Regular meetings are conducted with neighbouring communities to inform and educate on fire prevention techniques.
- Fire extinguishers are located in various locations within OOPC concession.
- OOPC staff members are educated on the use of fire extinguisher annually.
- Regular audit is conducted with State Fire Service for proper inspection of fire-fighting equipment.
- HSE Manager is responsible for managing the fire brigade and this policy.

## 5.0 Record of Approval

Task	Name/signature	Job title	Date
Approved by	Dr. Graham Hefer	Managing Director	10 JUL 2020



	Document title	Revision: 1
	<b>OKOMU OIL PALM COMPANY PLC</b>	Date: 15/04/20
	<b>GENDER POLICY</b>	Page 1 of 2

## 1.0 Policy Statement

The Okomu Oil Company PLC (OOPC) is committed to maintaining a positive climate at work, in which individuals can work together in an environment free of all forms of violence, harassment, and discrimination on the basis of gender. OOPC strongly believes and supports gender equality and opposes any form of gender discrimination and violence at the workplace. The Company is therefore obligated in providing a safe work environment which is free from any kind of bias and harassment. The organization draws its source by upholding the constitutional mandate (section 17, 34, 35, Nigeria Constitution) and (Nigeria Labour Act 2004 section 73) to ensure the human rights of the people that are under its jurisdiction.

## 2.0 Scope

This policy applies to all employees, contractors (including temporary contractors and third party staff) of OOPC

## 3.0 Policy Requirement

The Gender Committee at OOPC has been set up with an objective of providing men & women an appropriate complaint mechanism against any inequality issue or unwelcome behavior in any manner. The policy suggests mechanisms that are accessible and will ensure confidentiality. It also serves as a system to ensure the fair, accountable and representative procedures for redressal and resolution. This Policy also defines the Physical, Psychological and Emotional harassment, physical or verbal form) by any gender and the mechanisms of redressal through the Committee by looking at the specific structures, needs and imperatives in OOPC. However, for female members, Sexual harassment is guided by the definition of Sexual Harassment given by the Nigeria law.

## 4.0 Objective

Okomu Oil Palm Company (OOPC) aims to fulfill its obligations under this policy by removing any barriers that prevent women from achieving equality and seek to protect the reproductive rights of women.

## 5.0 Scope


The policy applies to employees and contractors (including temporary contractors) of OOPC. This policy does not form part of any employee's contract of employment or contractor's services.

## 6.0 Definitions

Gender equality" means the equal rights, obligations, opportunities and liability of men and women in professional life, upon acquisition of education and participation other areas of social life; Equal treatment for men and women" means that there Shall be no discrimination whatsoever based on sex, either directly or indirectly;

- a. Direct discrimination based on sex" occurs where one person is treated less favorably on grounds of sex than another is, has been or would be treated in a comparable situation. Direct discrimination based on sex also means the less favorable treatment of a person in connection with pregnancy and childbirth, parenting, performance of family obligations or other circumstances related to gender, and sexual harassment;
- b. indirect discrimination based on sex" occurs where an apparently neutral provision, criterion or practice would put persons of one sex at a particular disadvantage compared with persons of the other sex unless that provision, criterion or practice is objectively justified by a legitimate aim, and the means of achieving that aim are appropriate and necessary;
- c. Harassment has been defined under the categories of Psychological Physical and emotional. The following shall constitute Harassment
  - When unwelcome acts like any visual, verbal or physical conduct such loaded comments, remarks or jokes, emails, letters, phone calls, text messages, gestures, physical contact, stalking, display of a derogatory nature or creating an intimidating, hostile or offensive environment.



	Document title	Revision: 1
	<b>OKOMU OIL PALM COMPANY PLC</b>	Date: 15/04/20
	<b>GENDER POLICY</b>	Page 2 of 2

- Any unwelcome sexual advances, requests for sexual favors or any conduct of a sexual nature (Verbal or nonverbal conduct)
- Any action or comment/s (racial, ethnic, religious etc) which has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

#### 7.0 Guidelines

- To espouse the cause of the right to gender equality and right to dignified livelihood.
- To foster a social, physical and psychological environment that will enable employees to work productively.
- Capacity building for gender sensitization: We will organize workshops, training programs and discussions for promoting and enabling a gender sensitive work culture. Also, regular trainings will be conducted on awareness and confidence building of field staff, with special focus on women staff.
- Building skills and capacities on gender perspectives to enable greater participation of all sections of community in our programs will be one of our objectives in all programs.
- This policy would implement the sexual harassment, child labour and female reproductive policies of the Company.

#### 8.0 Role of the Gender Committee

The Committee's role will include of following:

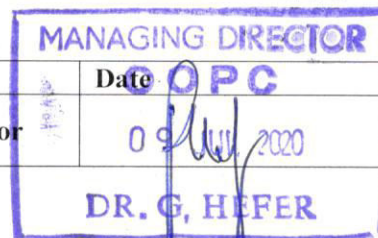
- To play a preventive role by making efforts towards sensitization of the staff on gender issues by conducting periodic programs and in house workshops/gathering.
- To take cognizance of complaints about Harassment, conduct proper enquiries, provide assistance and redressal to the victims, recommend penalties and action against harasser, if required.
- Ensure Safety and equality at all levels at the workplace.
- To recommend arrangements for appropriate emotional, psychological and physical support (in form of counseling and other assistance), if desired by the victim.
- Child care facilities to be provided by the growers and millers.
- Ensure vehicles are provided to breastfeeding mothers to take them to child care facilities to breastfeed their babies
- Women to be given specific break times to enable effective breastfeeding.
- The policy shall be reviewed annually.

#### 9.0 Procedures of Registering Complaints

To follow OOPC procedure GP 27 (Grievance Procedure) attached.

#### 10.0 Record of Approval

Task	Name/signature	Job title	Date
Approved by	Dr. Graham Hefer	Managing Director	09 JUL 2020



## 1.0 Policy Statement

OOPC monitors its greenhouse gas (GHG) emission and is constantly seeking for ways to reduce its carbon footprint in our plantation and industrial operations. We constantly strive to adopt best practices to reduce emission of carbon compounds in our palm plantations and oil mills. This is demonstrated in our optimal use of electricity from the national grid, and the use of the fresh fruiting bunch (FFB) fibre/kernel shells in our boilers. Further innovations to lower our carbon footprint include the installation of a steam turbine, which, together, enable the company to reach all of the GHG emissions reduction objectives, targets and timelines that have been adopted.

## 2.0 Scope

This policy applies to every area of our operations.

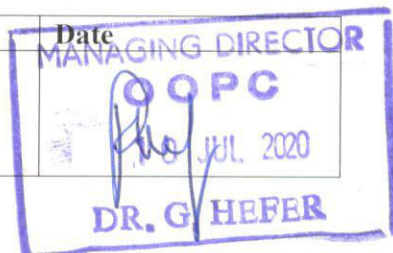
## 3.0 Guidelines

OOPC commits to:

- Constituting periodic green energy meetings aimed at reducing the use of fossil fuel in our operations.
- Identifying areas of significant GHG emissions and implementing plans to reduce or minimize them.
- Supporting the reduction of emissions from deforestation and forest degradation through the maintenance and protection of our forests.
- Conserving high carbon stock (HCS) forests and high conservation value (HCV) areas, and enhancing them where necessary.
- Minimizing the utilization of generation sets.
- Establishing a monitoring system to annually report our progress in reducing significant pollutants and emissions from our plantation and mill operations using palm GHG calculation from RSPO.
- Optimizing the use of FFB fibre/kernel shells in our boiler and increasing the use of the steam turbine as a priority over other alternative energy sources available to the company.
- Implementing our 'zero burning policy'.
- Reducing, recycling, reusing waste and disposing of waste, in an environmentally and socially responsible manner.
- Replacing regular light bulbs with more eco-friendly, compact fluorescent lights (CFL) in offices/production sites.
- Regular maintenance of all company's vehicles, road upkeep and to create shorter routes to mill and plantation fields thereby using less fossil fuels.
- Quarterly testing of ambient air quality.
- Reforestation of required areas in riparian areas which will be extracted from monitoring records.
- Since fertilizer is an important source of carbon, the plantation department will ensure fertilizer application is based on results of Annual foliar analysis and once in 5 years soil analysis results
- Setting Key Performance Indicator (KPI) for turbine use.

## 4.0 Record of Approval

Task	Name/signature	Job title
Approved by	Dr. Graham Hefer	Managing Director





## 1.0 Policy Statement

OOPC will provide a positive and supportive environment for all of its employees, visitors, contractors, third parties contractor and stakeholders, and as such will take every step to resolve issues within the workplace, and communities/stakeholders as quickly and efficiently, at the lowest possible level.

## 2.0 Scope

This policy is applicable to all stakeholders associated with OOPC.

## 3.0 Definitions

**Grievance Management:** is defined as a concern or complaint raised by an individual or group, in relation to activities undertaken by OOPC.

## 4.0 Guidelines

The following commitments will apply to OOPC's grievance management activities.

- In resolving conflicts, OOPC will avoid escalation of conflicts and prohibiting the usage of dogs and paramilitary in the organization.
- OOPC shall set up a process for recording and addressing external and internal grievances that are culturally appropriate (see OOPC grievance management procedure GP 27).
- OOPC shall establish and monitor a grievance management plan communicated in a way that it is accessible to all stakeholders.
- OOPC must commit to assess how grievances are received and responded to, based on the principles of transparency and accountability for all stakeholders.
- All stakeholders will be able to raise grievances without fear of reprisals, costs or retribution.
- OOPC will treat all matters with due confidentiality; individuals may report a grievance anonymously, although this blocks the access to engage them on a dialog in order to resolve or clarify the grievance.
- Grievances can be submitted through the Community Liaison Officer, Communication Officer or the following channels:

**By email:** [hsesec@okomunigeria.com](mailto:hsesec@okomunigeria.com)

**By telephone:** 08068774161

**In writing to:** Okomu-Udo Ovia South West LGA. P.M.B 1449, Benin City, Edo State  
Nigeria Attention: HSE Department (Grievance section)

- All grievances will be responded to within 15 days, either with a resolution or an update on progress if a resolution has not been found. All grievances should be resolved within 30 days or brought to the attention of the MD.
- OOPC shall decide and announce to the stakeholders the schedule for the periodic reporting on the management of the grievances received.
- This policy will be communicated to all stakeholders as per OOPC communication procedure GP 10.
- The HSE Manager shall control, monitor and manage all grievances on behalf of OOPC.

## 5.0 Record of Approval

Task	Name/signature	Job title
Approved by	Dr. Graham Hefer	Managing Director





## 1.0 Policy Statement

Respect for human rights is a fundamental value of OOPC. We strive to respect and promote human rights in accordance with the UN Guiding Principles on business and human rights in our relationships with our employees, suppliers and stakeholders. Our aim is to help increase the enjoyment of human rights within the communities in which we operate. This Human Rights policy elaborates on the requirement within our code of ethics policy to treat everyone at OOPC - and everyone with whom we come into contact - with fairness, respect and dignity. OOPC is committed to protecting individuals and their reports, complaints or disclosures filed in good faith. We also recognize that Human rights defenders work to promote transparent and accountable governments, clean and safe environments, fair working conditions, and equitable societies. They play a critical role in fostering corporate transparency and respect for human rights, such as monitoring of supply chains, exposing corruption, and protecting our shared environment. Based on this, we provide access to reliable channels to report wrongdoing; robust protection from all forms of retaliation; and mechanisms for reporting that promote reforms that correct legislative, policy or procedural inadequacies and prevent future wrongdoing. We also prohibit intimidation and harassment, including from security services/forces. This Policy is guided by the Universal Declaration of Human Rights, including those contained within the international Bill of rights and international labour organization's 1998 Declaration on Fundamental principles and rights at work, United Nations declaration on Human Rights Defenders, The International Covenant on Civil and Political Rights (explicitly referencing the protection of whistleblowing as an aspect of freedom of expression under Article 19), The International Covenant on Economic, Social and Cultural Rights; Convention on the Elimination of All Forms of Discrimination against Women (CEDAW); The International Labour Organisation's (ILO) Declaration on Fundamental Principles and rights to work; and RSPO Policy on the Protection of Human Rights Defenders, Whistleblowers, Complainants and Community Spokespersons.

## 2.0 Scope

This policy applies to all OOPC employees, contractors, service providers, and third party workers. It also covers the Human rights defenders (HRD), Environmental human rights defenders, whistleblowers and complainants within our stakeholders group, including community spoke persons. In implementing this Policy, we are subject to the laws of Nigeria and we are committed to complying with all such applicable laws. Our principle is that where national law and international human rights standards differ, we will follow the higher standard; where they are in conflict, we will adhere to national law, while seeking ways to respect international human rights to the greatest extent possible. Where local laws prohibit us from upholding certain aspects of this policy, we will comply with these local laws while continually seeking to respect and protect human rights. OOPC strives to prioritize the management of the human rights impacts of our business activities based on the operational context, our leverage and business relationships. As a result, we concentrate on our own operations and contractors/suppliers, most specifically on human rights related to labour conditions. OOPC, however, recognizes that other human rights may become greater priorities over time and we will regularly review our focus areas.

## 3.0 Definitions

**Adequate:** Capable of leading to the identification and punishment of those responsible

**Environmental Human Right Defenders:** Individuals and/or groups who, in their personal or professional capacity and in a peaceful manner strive to protect and promote human rights relating to the environment, including water, air, land, flora and fauna. They are characterized through their actions to protect environmental and land rights. Although they may work as journalists, activists or lawyers who expose and oppose environmental destruction or land grabbing, in many cases they are indigenous leaders or community members who defend their traditional lands against the harms of large -scale development projects.

**Human Rights Defenders (HRD's):** Individuals, groups or associations who promote and protect universally recognised Human Rights and contribute to the elimination of all forms of violations and fundamental freedoms of individuals and peoples. This definition does not include those individuals who commit or propagate violence.

**Impartial and independent:** Those responsible for carrying out the investigation must fair and not reliant only on the parties involved in the events under investigation;

**Prompt:** The investigation must be commenced swiftly and be completed within a reasonable time;

**Reasonable belief:** is defined as when a person could reasonably suspect wrongdoing in light of available evidence.

**Thorough:** Comprehensive in scope and – among other things – capable of identifying any systematic failures that led to the violation;

**Whistleblower:** Is anyone who exposes (reports) fraud, extortion, or sabotage to the relevant authority.



	Document title	Revision: 2
	<b>OKOMU OIL PALM COMPANY PLC</b>	Date: 02/10/20
	<b>HUMAN RIGHTS POLICY</b>	Page 2 of 2

#### 4.0 Guidelines

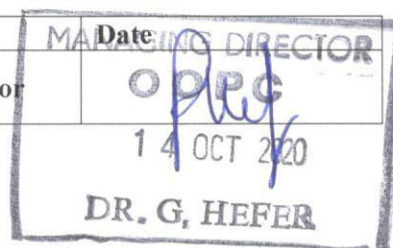
OOPC commits to:

- Recognize and respect the rights of all workers, including the workers of contractors, temporary workers or migrant workers. Our commitment is further manifested in policies such as the Code of Ethics Policy, Sexual Harassment Policy, Child Labour Policy, HIV/AIDS Policy, Safety and Healthy Workforce policy, Forced labour and Human Trafficking policy and amongst others.
- Conduct our business in a manner that respects the rights and dignity of all people whilst complying with all legal requirements.
- Treat everyone who works for OOPC fairly and without discrimination. Our employees, contractor staff and suppliers are entitled to work in an environment and under conditions that respect their rights and dignity.
- Respect freedom of association and ensure no forced, trafficked or bonded labour. Where our employees wish to be represented by workers unions, we will cooperate in good faith with the bodies that our employees collectively choose to represent them within the appropriate national legal frameworks.
- Recognize and respect the rights of local and indigenous communities by respecting their cultures, customs, values and land tenure rights. We commit to obtaining Free, Prior and Informed Consent from local communities before commencing new operations and commit to open, transparent, fair and equitable conflict resolution.
- Respect the rights of people in communities impacted by our activities and maintain a transparent and open dialogue with them. We will seek to identify adverse human rights impacts and take appropriate steps to avoid, minimize and/or mitigate them.
- Seek to make contractual commitments with contractors/suppliers that encourage them to adhere to the same principles.
- Ensure the provision of security is consistent with laws of Nigeria, using security services only where necessary and requiring the use of force only when necessary and proportionate to the threat.
- Continue to build the awareness and knowledge of our management, employees and contractors/suppliers on labour rights and this policy and encouraging them to speak up, without retribution, about any concerns they may have.
- Place importance on the provision of effective company-based grievance mechanism which is applicable to all stakeholders to ensure remediation of potential abuses. Any stakeholder with concerns regarding the human rights impacts of OOPC's activities may raise these through the grievance management process.
- Continue increasing the capacity of our management to effectively identify and respond to concerns.
- Grant protection for reports made by HRD with a **reasonable belief** that the information is true at the time it is disclosed.
- Protect individuals to safeguard the individuals' physical and psychological integrity and that of their family group, their property and working conditions; against violence, threats, all forms of retaliation, direct or indirect, pressure or any other arbitrary action as a consequence of the individual's legitimate exercise of their fundamental human rights in the course of their engagement with OOPC or as a result of their report against violation of human rights.
- Protect individuals from all forms of retaliation, disadvantage or discrimination (all types of harm, including but not limited to: dismissal, probation and other job sanctions; punitive transfers; harassment; reduced duties or hours; withholding of promotions or training; loss of status and benefits; and threats of such action) in workplace linked or resulting from HRD activities. OOPC seek to preserve the individual's confidentiality. The identity of the individual may not be disclosed without the individual's explicit informed consent.
- Ensure employees and workers have the right to decline to participate in corrupt, illegal or fraudulent acts.
- Provide protection against threat to individuals who have disclosed information anonymously including those who subsequently have been identified without their explicit consent.
- Ensure that any investigation is **adequate, thorough, impartial, independent and prompt**; and a sufficient element of transparency of the investigation or its result to ensure accountability.
- Ensure full range of remedies, covering all direct, indirect and future consequences of any reprisals.

The Human Resource Manager shall ensure implementation and monitoring of this policy

#### 5.0 Record of Approval

Task	Name/signature	Job title
Approved by	Dr. Graham Hefer	Managing Director





	Document title	Revision: 2
	<b>INTEGRATED MANAGEMENT SYSTEM POLICY</b>	Date: 03/08/20
	Reference <b>IMSP</b>	Page 1 of 1

## 1.0 Policy Statement


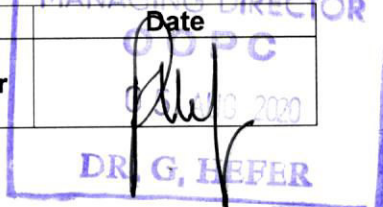
The **OKOMU OIL PALM COMPANY PLC** is determined to achieve sustained success by meeting the needs and expectations of our customers and other interested parties, over the long term and in a balanced way.

To that end, OOPC is committed to:

- Providing customers with high quality products and services which meet requirements and are fit for their purpose.
- Understanding, satisfying and taking into account the current and future needs and expectations of the customers and other interested parties; to build with them mutually beneficial relations on the basis of a balance of interests and achievement of the goals in accordance with the company's development strategy.
- Maintaining existing and developing new markets for production and services, to adapt to new requirements in order to ensure competitive advantages.
- Taking into account the external and internal factors of the business environment and to manage risks and opportunities in accordance with the Risk Management Policy of the company.
- Complying with all international, national laws and the company's own health, safety, quality and environmental legislations, laws, regulations and other requirements related to our activities, products and services.
- Enhancing the skills of management and staff through review and actively pursuing an on-going training policy, the objective of which is to prepare staff to perform their work more effectively.
- Advocating the adoption of prudent health, safety, environmental and quality principles to our vendors, suppliers, and customers and prevention of the supply of unsatisfactory quality products and services, workplace health and safety hazards and environmental pollution.
- Reduce and eliminate the generation of waste and emissions at the source, prevent pollution, conserve natural resources, sustainable resource use, protection of biodiversity & ecosystem and make all efforts to recycle when practical.
- Integrating health and safety considerations into decision making at all levels to prevent injury and ill health risks to our people and ensuring the participation and consultation of all employees and their representatives in the occupational health and safety management system.
- Involving all employees in improvement and innovation and generating awareness amongst all concerned for their roles and responsibilities in ensuring effective quality, environment, and health & safety management systems.
- Providing all the resources of equipment, human, technical and any other requirements to promote the Integrated Management System.
- Promoting the Integrated Management System and continually improving its effectiveness through the use of the IMS policy, targets and objectives, audit results, monitoring and measurement, analysis of data, corrective and preventive actions and management review.
- Communicating this policy to all persons working for or on behalf of the organization and its stakeholders and making it available to any interested party.
- Reviewing of this policy annually or following significant changes to our business practices.

The Managing Director confirms the commitment and support, along with that of all employees and those working on behalf of the company, to the above policy statement and the effective application and continual improvement of the Integrated Management System.

## 2.0 Record of Approval

Task	Name/signature	Job title	Date
Approved by	Dr. Graham Hefer	Managing Director	 

	Document title	Revision: 1
	OKOMU OIL PALM COMPANY PLC	Date: 11/06/2020
	MANAGEMENT REVIEW POLICY	Page 1 of 1

# 1. SCOPE

- This policy applies to all the activities within the scope of OOPC's Quality Management System (QMS), Environmental Management System (EMS), Occupational Health and Safety Management System (OH&SMS), Roundtable on Sustainable Palm Oil (RSPO) and Supply Chain Certification Standards (SCCS).

# 2. PURPOSE

- To ensure that top management systematically reviews the QMS, EMS, OH&SMS, RSPO and SCCS performance, in accordance with the established operating procedures.
- To review the adequacy, suitability, and effectiveness of previous corrective and preventive actions including those related to outsourced service and supplier performance.
- To identify strengths and opportunities for improvement and make recommendations for continual improvement.

# 3. DEFINITIONS

- Management Review (MR): Cross-functional review by an organization's top management which takes place at regular intervals aimed to assess the organization success at achieving set objectives established thus ensuring its continued suitability, adequacy and effectiveness and to take action to correct it when necessary.
- HSE Manager: Health, Safety and Environment Manager.
- H.O.D: Head of Department
- Objective: A statement to describe what should be achieved within the time frame and available resources. It shall be consistent with the evidence-based practice and the visions that the organization creates itself to achieve.
- Audit: A systematic, independent and documented process for obtaining audit evidence (records, statements of fact or other information which are relevant and verifiable) and evaluating it objectively to determine the extent to which the audit criteria (set of standards, policies, procedures or requirements) are fulfilled.

# 4. RESPONSIBILITY AND AUTHORITY

The following will be responsible for the process of preparing for the Management Review Meeting:

## 4.1 Managing Director (MD)

- Assures the implementation of the policy

## 4.2 HSE Manager

- Coordinates with the MD on the date and time of the meeting
- Assures the implementation of the MR policy
- Chair the MR meeting
- Invite members of the top management to the meeting
- Invite other categories of staff as and when required
- Communicate the relevant output of management reviews to HSE representatives of various departments.
- Prepare and present the agenda of the meeting
- Take the list of attendance
- Make minutes of the meeting that include discussion points raised along with the suggestions as well as the decisions that are made during the output session
- Follow-up on the decisions that have been taken during the output discussion
- Follow upon the implementation of this MR Policy.

## 4.3 H.O.D

- Give feedback of the management system and comply with recommendation from the management review.
- Communicate relevant outputs of the management reviews to workers.

# 5. PROCEDURE

- All Managers and Head of Units or its representative are mandated to be in attendance in every management review and absence needs to be justified.
- Top management shall review the organization's QMS, EMS, OH&SMS, RSPO and SCCS annually, to ensure its continuing suitability, adequacy and effectiveness.
- The management review shall include consideration of:
  - The status of actions from previous management reviews
  - Changes in any updates of the management systems
  - The extent to which objectives have been achieved
  - Information on the organization's performance
  - Adequacy of resources
  - Relevant communication(s) from interested parties, including complaints
  - Opportunities for continual improvement

# 6. REFERENCE DOCUMENTS

- IMS Manual
- Procedure for Internal Audit
- Procedure for Correction & Corrective Action
- ISO 9001:2015, ISO 14001:2015, ISO 45001:2018, RSPO and SCCS Standards

# 7. RECORDS:

Records of the review will be maintained by the HSE department and kept in the ISO folder for all HOD to view. Records will include:

- Attendance
- Minutes of Meeting
- PowerPoint Slide for presentation
- Training Power Point slide if needed
- Other supporting records (Forms, operational records, permits, photos etc.)

# 8. RECORD OF APPROVAL

Task	Name/signature	Job title	Date
Approved by	Dr. Graham Hefer	MANAGING DIRECTOR Managing Director 17 JUL 2020 DR. G. HEFER	



	Document title	Revision: 2
	<b>INTEGRATED MANAGEMENT SYSTEM POLICY</b>	Date: 03/08/20
	Reference <b>IMSP</b>	Page 1 of 1

## 1.0 Policy Statement

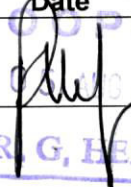
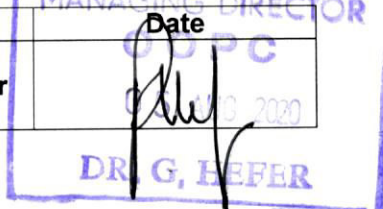
The **OKOMU OIL PALM COMPANY PLC** is determined to achieve sustained success by meeting the needs and expectations of our customers and other interested parties, over the long term and in a balanced way.

To that end, OOPC is committed to:

- Providing customers with high quality products and services which meet requirements and are fit for their purpose.
- Understanding, satisfying and taking into account the current and future needs and expectations of the customers and other interested parties; to build with them mutually beneficial relations on the basis of a balance of interests and achievement of the goals in accordance with the company's development strategy.
- Maintaining existing and developing new markets for production and services, to adapt to new requirements in order to ensure competitive advantages.
- Taking into account the external and internal factors of the business environment and to manage risks and opportunities in accordance with the Risk Management Policy of the company.
- Complying with all international, national laws and the company's own health, safety, quality and environmental legislations, laws, regulations and other requirements related to our activities, products and services.
- Enhancing the skills of management and staff through review and actively pursuing an on-going training policy, the objective of which is to prepare staff to perform their work more effectively.
- Advocating the adoption of prudent health, safety, environmental and quality principles to our vendors, suppliers, and customers and prevention of the supply of unsatisfactory quality products and services, workplace health and safety hazards and environmental pollution.
- Reduce and eliminate the generation of waste and emissions at the source, prevent pollution, conserve natural resources, sustainable resource use, protection of biodiversity & ecosystem and make all efforts to recycle when practical.
- Integrating health and safety considerations into decision making at all levels to prevent injury and ill health risks to our people and ensuring the participation and consultation of all employees and their representatives in the occupational health and safety management system.
- Involving all employees in improvement and innovation and generating awareness amongst all concerned for their roles and responsibilities in ensuring effective quality, environment, and health & safety management systems.
- Providing all the resources of equipment, human, technical and any other requirements to promote the Integrated Management System.
- Promoting the Integrated Management System and continually improving its effectiveness through the use of the IMS policy, targets and objectives, audit results, monitoring and measurement, analysis of data, corrective and preventive actions and management review.
- Communicating this policy to all persons working for or on behalf of the organization and its stakeholders and making it available to any interested party.
- Reviewing of this policy annually or following significant changes to our business practices.

The Managing Director confirms the commitment and support, along with that of all employees and those working on behalf of the company, to the above policy statement and the effective application and continual improvement of the Integrated Management System.

## 2.0 Record of Approval

Task	Name/signature	Job title	Date
Approved by	Dr. Graham Hefer	Managing Director	 

	Document title	Revision: 1
	OKOMU OIL PALM COMPANY PLC	Date: 11/06/2020
	MANAGEMENT REVIEW POLICY	Page 1 of 1

# 1. SCOPE

- This policy applies to all the activities within the scope of OOPC's Quality Management System (QMS), Environmental Management System (EMS), Occupational Health and Safety Management System (OH&SMS), Roundtable on Sustainable Palm Oil (RSPO) and Supply Chain Certification Standards (SCCS).

# 2. PURPOSE

- To ensure that top management systematically reviews the QMS, EMS, OH&SMS, RSPO and SCCS performance, in accordance with the established operating procedures.
- To review the adequacy, suitability, and effectiveness of previous corrective and preventive actions including those related to outsourced service and supplier performance.
- To identify strengths and opportunities for improvement and make recommendations for continual improvement.

# 3. DEFINITIONS

- Management Review (MR): Cross-functional review by an organization's top management which takes place at regular intervals aimed to assess the organization success at achieving set objectives established thus ensuring its continued suitability, adequacy and effectiveness and to take action to correct it when necessary.
- HSE Manager: Health, Safety and Environment Manager.
- H.O.D: Head of Department
- Objective: A statement to describe what should be achieved within the time frame and available resources. It shall be consistent with the evidence-based practice and the visions that the organization creates itself to achieve.
- Audit: A systematic, independent and documented process for obtaining audit evidence (records, statements of fact or other information which are relevant and verifiable) and evaluating it objectively to determine the extent to which the audit criteria (set of standards, policies, procedures or requirements) are fulfilled.

# 4. RESPONSIBILITY AND AUTHORITY

The following will be responsible for the process of preparing for the Management Review Meeting:

## 4.1 Managing Director (MD)

- Assures the implementation of the policy

## 4.2 HSE Manager

- Coordinates with the MD on the date and time of the meeting
- Assures the implementation of the MR policy
- Chair the MR meeting
- Invite members of the top management to the meeting
- Invite other categories of staff as and when required
- Communicate the relevant output of management reviews to HSE representatives of various departments.
- Prepare and present the agenda of the meeting
- Take the list of attendance
- Make minutes of the meeting that include discussion points raised along with the suggestions as well as the decisions that are made during the output session
- Follow-up on the decisions that have been taken during the output discussion
- Follow upon the implementation of this MR Policy.

## 4.3 H.O.D

- Give feedback of the management system and comply with recommendation from the management review.
- Communicate relevant outputs of the management reviews to workers.

# 5. PROCEDURE

- All Managers and Head of Units or its representative are mandated to be in attendance in every management review and absence needs to be justified.
- Top management shall review the organization's QMS, EMS, OH&SMS, RSPO and SCCS annually, to ensure its continuing suitability, adequacy and effectiveness.
- The management review shall include consideration of:
  - The status of actions from previous management reviews
  - Changes in any updates of the management systems
  - The extent to which objectives have been achieved
  - Information on the organization's performance
  - Adequacy of resources
  - Relevant communication(s) from interested parties, including complaints
  - Opportunities for continual improvement

# 6. REFERENCE DOCUMENTS

- IMS Manual
- Procedure for Internal Audit
- Procedure for Correction & Corrective Action
- ISO 9001:2015, ISO 14001:2015, ISO 45001:2018, RSPO and SCCS Standards

# 7. RECORDS:

Records of the review will be maintained by the HSE department and kept in the ISO folder for all HOD to view. Records will include:

- Attendance
- Minutes of Meeting
- PowerPoint Slide for presentation
- Training Power Point slide if needed
- Other supporting records (Forms, operational records, permits, photos etc.)

# 8. RECORD OF APPROVAL

Task	Name/signature	Job title	Date
Approved by	Dr. Graham Hefer	MANAGING DIRECTOR Managing Director 17 JUL 2020 DR. G. HEFER	



	Document title	Revision: 4
	<b>OKOMU OIL PALM COMPANY PLC</b>	Date: 11/06/2020
	<b>PROTECTION OF REPRODUCTIVE RIGHTS POLICY</b>	Page 1 of 1

#### 1.0 Policy Statement

OOPC has a strong guiding principle that the appropriate way to ensure equality in the workplace is to respect the reproductive rights of all, especially women.

#### 2.0 Objective

Okomu Oil Palm Company (OOPC) aims to fulfill its obligations under this policy by removing any barriers that prevent women from achieving equality and seek to protect the reproductive rights of women.

#### 3.0 Scope

The policy applies to employees and contractors (including temporary contractors) of OOPC. This policy does not form part of any employee's contract of employment or contractor's services.

#### 4.0 Definitions

4.1 **Reproductive rights:** legal rights and freedom relating to reproduction and reproductive health.

4.2 **Woman:** any member of the female sex irrespective of age or status.

#### 5.0 Guidelines


OOPC has devised the following measures to protect the reproductive rights of women and promote gender equality at work.

- Constitute a gender committee, which will include representatives from all departments of OOPC specifically to address areas of reproductive concern to women.
- Workplace consultation regarding issues relating to equal opportunity for all staff, contract workers and third party workers.
- Sensitization and awareness for women about their reproductive rights.
- Ensure that no work with pesticides is undertaken by pregnant or breast feeding women.
- Adequate space and paid breaks will be provided to enable mothers with infants 24 months or younger to breastfeed or express and store breast milk with privacy.
- OOPC shall comply with the Labour Act of Nigeria (2004), as amended, which ensures the rights of women to maternity protection and prohibits dismissal from work on account of her pregnancy status. OOPC also subscribes to the minimum standards of the International Labour Organization (ILO) Maternity Protection Convention (Revised), 1952 (No. 103), and the Maternity Protection Recommendation, 1952 (No. 95), stipulating that no woman shall be discriminated against on grounds of pregnancy and childbirth and women bearing a child shall be protected from dismissal on such grounds during the entire period of pregnancy and maternity leave. They shall have the right to resume their employment without loss of acquired rights.
- Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. However, where an employee has hinted her superior of her pregnancy on account of stress resulting from the pregnancy, the supervisor should communicate it to the manager who will then refer her to the company's doctor for a pregnancy test to be conducted. If confirmed that such employee is actually pregnant, a lighter alternative equivalent employment is offered to her without alteration of her pay.
- OOPC shall comply with the National Labour Act, allowing a woman employee (on medical certificate to take her confinement 6 weeks prior to delivery and to remain on confinement following delivery; protecting a pregnant woman from night work.
- The Grievance Management Procedure (GP27) should be followed if any of the above rights are perceived to have been violated.
- The HRD shall manage, monitor and oversee this policy.

#### 6.0 Record of Approval

Task	Name/signature	Job title
Approved by	Dr. Graham Hefer	Managing Director



	Document title	Revision: 2
	<b>OKOMU OIL PALM COMPANY PLC</b>	Date: 07/07/20
	<b>RECRUITMENT POLICY</b>	Page 1 of 2

## 1.0 Policy Statement

The Company's current recruitment policy is performed on a competitive interview and equal opportunity basis, regardless of sex, race, ethnicity, religion or political persuasion solely on merit, relevant qualifications and/or experience in collaboration with or on behalf of OOPC through certified labour brokers.

## 2.0 Scope

This policy is applicable to certified labour brokers for all recruitment processes on behalf of OOPC where the company requires the services of any person on a secondment basis. Where independent contractors and/or third parties require the recruitment of labour or staff, either directly or indirectly through labour brokers, then the contents of this policy are also applicable to them.

## 3.0 Definitions


- (i) **Direct Employment:** This is no longer an option in OOPC, but current employees who are employed as a staff of the company on this basis, are, as per their terms and conditions of employment, which includes confirmation after probation until the employment relationship is severed through resignation, retirement, redundancy, termination, dismissal or death.
- (ii) **Seconded Employees:** OOPC currently utilizes the services of Federal Government Ministry of Labour certified brokers to source an employee or a group of employees on behalf of OOPC under similar terms and conditions, to those stated in Clause 1.0 herein, and whom are, once chosen, then assigned to work for OOPC under similar terms and conditions to those employees denoted in Clause 3.0 (i). On expiry of the secondment term, for any of the reasons stated in Clause 3.0 (i) herein above, the employee (the 'seconded') will then return to their original employer (the 'Broker').
- (iii) **Temporary staff:** A person is designated a temporary staff when he /she is employed on a short-term basis, such as NYSC and Industrial Attachment (a maximum of 12 months at any given time). The company's terms and conditions of service are not applicable to temporary staff.

## 4.0 Recruitment Procedures

The procedure for employment into any of the above (i-iii) categories of staff shall be as follows:

- I. There must be a vacancy before a department could request for additional staff.
- II. The department wanting to fill a vacancy or requesting for additional staff, shall fill an employee's job requisition form stating reasons for the request, the job description and the required specification (Qualification)
- III. The department sends the completed job requisition form to the HR for processing and approval by the MD.
- IV. Upon approval by the MD, the HRD announces a job vacancy and solicits for applications from suitably qualified candidates.



	Document title	Revision: 2
	<b>OKOMU OIL PALM COMPANY PLC</b>	Date: 07/07/20
	<b>RECRUITMENT POLICY</b>	Page 2 of 2

- V. The HR department invites short listed candidates to be interviewed, in conjunction with the Head of department where the vacancy exists.
- VI. The department would then fill a skill proficiency form for the successful/selected candidate which would be sent to the HR for processing and approval by the MD before an offer of employment is signed and issued to the candidate.
- VII. An acceptance of such offer of employment by the prospective employee implies an agreement on his/her part to abide by the terms and conditions of employment, as contained in his/her letter of employment.
- VIII. OOPC employment is based on equal opportunity, regardless of sex, race, ethnicity, religion or political persuasion. Prospective employees would be judged on merit, relevant qualification and experience.
- IX. OOPC shall endeavor to give the first right of employment to candidates within its neighboring communities, especially where one candidate is not from a neighboring community and the other candidate is, and where both candidates are equally qualified in all aspects for that vacancy. OOPC vacancy/vacancies will be placed on the community notice board and the community will provide OOPC with what they deem to be suitably qualified candidates for these vacancy/vacancies. In the event that the communities cannot provide suitable candidates that suit the existing vacancy, OOPC would make use of media outlets to source for suitable candidates to fill the existing vacancy. OOPC is at liberty to choose the mode of employment of the candidate as defined in clause 4

#### NOTE

- Provision of a Nigerian National Identity card is an added advantage.
- As stipulated in the Labour Act, 2004, as amended, of the Federal Republic of Nigeria, the minimum age for employment is 16. Article 3 of International Labour Organization (ILO) Minimum Age Convention 1973 (No. 138), states that the minimum age for admission to any type of employment or work which by its nature or the circumstances in which it is carried out is likely to jeopardize the health, safety or morals of young persons shall not be less than 18 years. Therefore, due to the various stipulations between Nigeria Law and ILO, the minimum age for employment in OOPC is 18.
- Medical fitness certificate must be conducted.
- No payment of any form of recruitment fee.

#### 5.0 Record of Approval

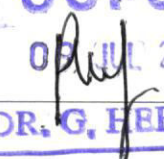
Task	Name/Signature	Job Title
Approved by	Dr. Graham Hefer	Managing Director





All drivers/operators must always take note of the following:

1. The maximum speed limit on all of Okomu's plantation roads and those connecting Okomu to Extension 1 is **40km/h** for vehicles and **30km/h** for lorries.
2. Speed limits for vehicles within residential houses is **10km/h** and school areas is **5km/h**
3. This speed limit can be seen on warning signs displayed on these roads.
4. Drivers/operators are also to obey all traffic laws applicable in Nigeria, including wearing seat belts whether or not they are on public or private Okomu roads.
5. In addition, the speed limiter which is fitted according to Nigerian law on vehicles is set at this speed (between **45km/h** to **100km/hr**) to comply with these standard regulations.
6. Drivers/operators are not permitted to tamper with, disconnect/connect the speed limiters at any time at the risk of a serious sanction or even termination/removal from the company and/or charges for any damages incurred.
7. Only the Workshop Manager is permitted to alter the speed of the speed limiter. Consequently, drivers/operators should contact their direct superior authority for permission in this regard.
8. Any person captured on satellite camera over speeding will face serious sanction by Management.
9. All drivers/operators shall have valid driver's licenses.
10. All drivers/operators shall sign off that they have read and understood OOPC Vehicle SOP and all applicable rules pertaining to driving OOPC vehicles as contained in the Vehicle SOP.

Task	Name	Job title	Signature/Date
Authorized by	Dr. Graham Hefer	Managing Director	 <b>DR. G. HEFER</b> 09 JUL 2020

### 1.0 Policy Statement

Okomu Oil Palm Company is committed to providing a safe and healthy working environment for our workers and stakeholders. We believe that all incidents and occupational illnesses are preventable, and we will work relentlessly to improve our safety performance towards zero incidents.

This requires us to work towards ensuring that we take all practicable steps to protect people involved in OOPC operations from harm. Our goal is to send everyone home safely every day.

### 2.0 Scope

This policy applies to all employees contractors (including temporary contractors and third party staff) of OOPC.

### 3.0 Guidelines

This policy can be done by:

- The ongoing implementation of our Integrated Management System Policy.
- Development and implementation of Minimum Standards for Safety, Environment and Process Safety.
- Ongoing development of the global IMS reporting platform and the continued development of an open reporting culture.
- Seeking continuous improvement to health and safety performance through setting annual objectives, targets, KPIs and focus areas, measurement of progress against our goals and communication to our stakeholders.
- Running an internal audit program and expanding existing audit programs.
- Commitment to provide safe and healthy working conditions for the prevention of work-related injury and ill health and which is appropriate to the purpose, size and context of OOPC, and to the specific nature of its OH&S risks and OH&S opportunities, while engaging our people to build and maintain a safe workplace.
- Development and delivery of training and education material to improve workers skills and awareness of IMS requirements and practices.
- Adhering to workers' complaints, and giving workers the ability to remove themselves from work situations that they consider present an imminent and serious danger to their life or health, as well as the arrangement for protecting them from undue consequences for doing so.
- Complying with all local and national legislations, and other requirements.
- Investigate all incidents to the root cause and make Corrective and Preventive Action Plans to avoid reoccurrence.
- Commitment to eliminate hazards and reduce OH&S risks
- Regular monitoring of PPE compliance and safety hazardous within the workplace.
- Commitment to consultation and participation of workers.

This policy is to be read in conjunction with the:

- High Risk Assessment- GP08
- Environmental Policy
- Incident and Hazard Reporting- GP18
- Safe Work Permit- GP20
- Boiler Room Operation- GP29 (Oil mill and Rubber factory)
- Emergency Preparedness and Response- GP12

### 4.0 Responsibility


- The HSE Manager shall ensure implementation and monitoring of this policy.

### 5.0 Record of Approval

Task	Name/signature	Job title
Approved by	Dr. Graham Hefer	Managing Director





	Document title	Revision: 1
	<b>OKOMU OIL PALM COMPANY PLC</b>	Date: 01/04/2020
	<b>CHILD LABOUR POLICY</b>	Page 1 of 1

### 1.0 Objective

OOPC does not condone the use of any child labour in any form whatsoever, by any person, company or institution, as defined in the International Labour Organization's Convention on Child Labour, and in the Nigerian Labour Act.

### 2.0 Scope

This policy is applicable to all employment processes in OOPC, contractors, and third party contract workers, or any company and/or institution that do business with OOPC.

### 3.0 Definitions

Child Labour: is defined as the employment of a child in business or industry in violation of Nigerian Federal statutes prohibiting the employment of children under a specified age. The Nigerian Labour Act 2004, as amended, classifies a child as a 'young person' under the age of fifteen (15) years.

### 4.0 Guidelines

- OOPC shall always comply with all relevant and applicable National labour regulations and principles relating to the protection, welfare, health and safety of children.
- No person deemed to be a child, as defined herein, shall be employed on any OOPC sites of operations.
- Furthermore, OOPC shall ensure that all contractors, companies and or organizations of any kind engaged by OOPC on the premises strictly abide by this policy.
- OOPC shall comply with the Child Protection Act of Nigeria (2004), as amended, to ensure the protection of all children against all forms of abuse, and the Employment Rights Act of Nigeria (2004), as amended, which prohibits the employment of any persons aged below 16. OOPC also, subscribes to the Education Act (2004) of Nigeria, as amended, which provides for compulsory education of all children up to the age 15. Article 3 of International Labour Organization (ILO) Minimum Age Convention 1973 (No. 138), states that the minimum age for admission to any type of employment or work which by its nature or the circumstances in which it is carried out is likely to jeopardise the health, safety or morals of young persons shall not be less than 18 years. Therefore, due to the various stipulations between Nigeria Labour law and ILO, the minimum age for employment in OOPC is 18.
- OOPC shall ensure proper implementation and monitoring this policy (as per OOPC's Child Labour Procedure).
- This policy will be communicated to all workers, staff, contractors, third parties, visitors and suppliers, or anyone who does business with OOPC (as per OOPC communication procedure GP10).

### 5.0 Record of Approval

Task	Name/signature	Job title	Date
Approved by	Dr. Graham Hefer	Managing Director	<div data-bbox="1052 1751 1435 1990" data-label="Text"> <p>MANAGING DIRECTOR OOPC 09 JUL 2020 DR. G. HEFER</p> </div>



## 1.0 Policy Statement

The Okomu Oil Palm Company (OOPC) is committed to demonstrating the highest level of regard for business ethics, environmental practices, and full compliance with all applicable laws pertaining to them.

## 2.0 Scope

This policy is applicable to all stakeholders doing business with, or who are on the premises of OOPC at any time.

## 3.0 Definition

Code of ethics: A written set of guidelines issued by an organization to its staff, management and stakeholders to help them conduct their actions in accordance with its primary values and ethical standards.

## 4.0 Guidelines

OOPC is committed to:

- Complying with all international and national legislation, regulations, and OOPC's own policies in conducting its business.
- Timely, accurate and truthful disclosure of reports and documents filed with or submitted to regulators, and in other public communications made by OOPC.
- Using its funds and assets for lawful corporate purposes only, and to maintain OOPC's financial integrity.
- Prohibiting all forms of corruption, bribery and fraudulent use of funds and resources among all parties working for or on behalf of OOPC.
- OOPC complies with the United Nations Convention against Corruption, Article 12, which prevents corruption involving the private sector.
- Prohibiting the employment of all forms of involuntary or underage labour in the production of goods and services.
- Fair and appropriate disciplinary practices and recognition of the entitlement of all individuals to be treated equitably with dignity and respect.
- Advocate the right of its employees' to freedom of association and to maintain a workplace free from discrimination, physical or verbal abuse, threats, intimidation and harassment, whilst embracing diversity and respecting the personal dignity, rights and privacy of every employee.
- Provide a safe and healthy work environment for its employees and managers and encourage adherence to environmental, safety and health rules (as per OOPC Environmental and Safety Aspect procedure GP08).
- Protect its assets and ensure their efficient use by all persons working for or on behalf of OOPC.
- Discourage its employees from participating in any decision in which they may be unable to maintain professional objectivity due to conflicts of interest.
- Engage only in fair and open competition, by treating competitors, suppliers, customers, and colleagues with integrity.
- Encourage its employees to maintain the confidentiality of information entrusted to them, except when disclosure is authorized by the MD or required by laws or regulations as contained in the Freedom of Information Act 2011 Laws of the Federation of Nigeria.
- Corporate/ promotional gifts and hospitality on acceptance by staff & Management valued N20, 000 and above must be declared through the HOD/MD.
- OOPC do not make Political contributions of any form whilst carrying out its business operations with individuals, government agencies, NGOs, etc.
- OOPC will give charitable donations and sponsorships in line with its Procedure GP35 Corporate Social Responsibility
- OOPC do not comply any form of unethical conduct such as charging fees to workers, recovering cost of recruitment and transportation against workers' wages, receiving gifts and commissions from labour intermediaries, contractors, suppliers or other interested parties.
- In resolving conflicts, OOPC will avoid escalation of conflicts and prohibiting the usage of dogs and paramilitary in the organization.
- Communicated to all persons working for or on behalf of OOPC (as per OOPC communication procedure GP10) and enforce its strict compliance.


The HSE Manager shall implement, monitor and document the provisions of this code.

The Managing Director confirms the commitment and support, along with that of all stakeholders, employees and those working on behalf of the company, to the above policy statement and the effective application and continual compliance with this code of ethics.

## 5.0 Record of Approval

Task	Name/signature	Job title
Approved by	Dr. Graham Hefer	Managing Director



	Document title	Revision: 2
	<b>OKOMU OIL PALM COMPANY PLC</b>	Date: 13/08/20
	<b>DRUG AND ALCOHOL POLICY</b>	Page 1 of 1

## 1.0 Policy Statement

OOPC is committed to providing a safe and healthy drug, alcohol and substance free workplace that enables OOPC staff, contractors, sub-contractors and third party contractors (defined as stakeholders) to perform at their most productive levels. Consistent with that commitment, the company has developed this policy statement regarding drug and alcohol use, and the testing thereof, to minimise its effects in the workplace.

## 2.0 Objective

The policy is designed to maintain a work place free from drugs and alcohol. The drug and alcohol policy covers illegal or illicit drugs, alcohol and other controlled substances. These will be referred to as prohibited substances within OOPC's work environment. The goal is to establish and maintain a work environment that is free from all drugs, alcohol and/or other controlled substances.

## 3.0 Scope

This policy is applicable to all stakeholders doing business with OOPC, during business hours.

Stakeholders shall be obliged to undergo random drug/alcohol tests at any time that OOPC requests them to do so. Refusal to undergo any test will lead to the immediate termination or loss of contract by the stakeholder(s) concerned.

## 4.0 Legislation

### **Driving**

0.00% is maintained for **ALL** driving activities within OOPC concessions during working hours. However as regards the Nigerian Highway Code section 2.6f, maximum permissible blood alcohol level for driving on the highway **ONLY** is 0.5gms per liter or 0.05% of Blood Alcohol Concentration (BAC)

## 5.0 Definitions

5.1 **Alcohol Dependence** is defined as: The habitual drinking of intoxicating liquor by a stakeholder, whereby the stakeholder's ability to perform his/her duties are impaired, and/or his/her attendance at work is negatively affected, and/or they endanger the safety of others.

5.2 **Drug Dependence** is defined as: The habitual taking of drugs by a stakeholder other than a drug prescribed as medication, resulting in a stakeholder's ability to perform his/her duties being impaired, and/or their attendance at work is negatively affected, and/or they endanger the safety of others.

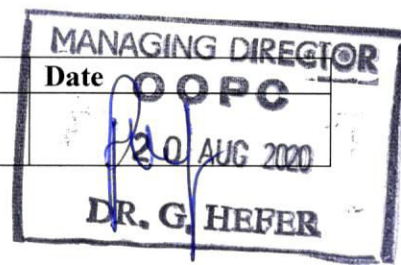
## 6.0 Guidelines

Any stakeholder, who violates this policy, may be subjected to one or all of the following measures:

- Disciplinary action, including termination of employment or contract.
- Violation by contractors or third party contractors will result in their removal from the workplace and their contract terminated.
- In the absence of a contractor's written policy, OOPC will administer appropriate elements of this policy as deemed necessary.
- This policy will be communicated to all stakeholders involved in any way with OOPC, as per OOPC Communication Procedure-GP 10.

## 7.0 Record of Approval

Task	Name/signature	Job title
Approved by	Dr. Graham Hefer	Managing Director





**EMERGENCY RESPONSE/CONTINGENCY PLAN FOR FIRE, SECURITY THREATS, MEDICAL, CHEMICAL SPILL, AND ELECTRIC SHOCK**

**1.0 Purpose/Scope**

This procedure defines the framework for preparing for and responding to emergencies involving fire, security threats, chemical spill, medical emergency and electric shock.

**2.0 Workplace/Activities Affected**

All workplace and departments

**3.0 Definitions**

3.1 Fire and Chemical spill are defined as materials which when released into the environment, or because of their properties and the way they are used, could cause harm to workers, from fires and explosions. Dangerous substances include petrol (PMS), liquefied natural gas (LPG), paints, chemicals and solvents.

3.2 Security threat is defined as any incident or confrontation that jeopardizes property and lives, which includes, but not limited to: militants and civil unrest.

3.3 Emergency Response-actions taken by personnel within the work area in an effort to mitigate the impact of an incident on the public and the environment.

3.4 TOC-Tactical Operations Centre: a communication Centre that coordinate all crisis activities.

3.5 Electric shock is defined as a sudden discharge of electricity through a part of the human body.

**4.0 Exclusions**

None

**5.0 Procedures**

In the circumstances:

**5.1 For fire and security threats:**

- The Person who has observed any danger must alert employees by sounding appropriate alarms. The alarm must be heard, seen or otherwise perceived by everyone in the workplace.
- The person must notify security/TOC on the emergency numbers posted in various locations in the work place, inform TOC of the situation fire/incident. If it's a fire, inform TOC of the location, injuries, potential fire hazards and risk (oil drums, paints, banga product, rubber, chemicals and gas bottles etc). TOC will brief fire service. If it is an incident, inform TOC of the type of incident, location description of suspect(s) type of weapon (if it involves a weapon) and any injuries at the scene.
- TOC will dispatch the appropriate authority to the scene, along with medical staff, if safe to do so, at the time.
- HSE representatives, will assist with evacuation of the worker(s) from the building.
- All workers must report to their muster point.
- HSE representatives will assist personnel with special needs or disabilities who may need help evacuating and assign one or more people, including backup personnel, to help them.
- Staff should ensure all windows and doors are closed, and all electrical appliances are switched off and unplugged before evacuating the building
- HSE representatives will do a head count to verify if anyone is missing, with the assistance of a contractor for their workers, if any are in that department.
- HSE representatives should ensure that no body returns to the factory/building until it is cleared by the appropriate authority.

**5.2 For chemical spill:**

**For small spill:**

- First person to observe a spill must use the appropriate spill kit to control the spill.

**For large spill:**

- The first person to observe the spill must contact their supervisor, who will notify HSE to dispatch the Spill Response team, to see a perimeter to contain the spill.
- The supervisor must notify TOC, for emergency assistance (if needed).
- HSE will notify The Federal Ministry of Environment.
- The Federal Ministry of Environment will assist in the disposal of waste and,
- Decontaminate the area and affected place.

**5.3 For medical emergency;**

- The person who has observed any emergency must notify TOC on the emergency numbers posted in various locations in the work place, inform TOC of the type of Emergency.
- TOC will notify and dispatch medical staff and ambulance to the scene.

**5.4 For electric shock;**

- First person to observe a shock situation should turn off the source of electricity, if possible, if not, notify the Estate department and contact TOC to dispatch the appropriate authority.
- Keep the shocked person warm, lying down, and still until the ambulance arrives.


**6 Emergency numbers**

0813 463 1183 (TOC) – 24hrs

**7 Record of Approval**

Task	Name/signature	Job title
Approved by	Graham Hefer	Managing Director



	Document title	Revision: 1
	<b>OKOMU OIL PALM COMPANY PLC</b>	Date: 11/06/2020
	<b>ENVIRONMENTAL POLICY</b>	Page 1 of 1

#### 1.0 Policy Statement

OkomuOilPalm Company(OOPC) recognizes the value, importance and necessity of sustainably managing its operations such that the present needs of society are met without compromising the ability of future generations to meet their own needs and enjoy the same resources we have today.

#### 2.0 Scope

This policy applies to all employees contractors (including temporary contractors and third party staff) of OOPC.

#### 3.0 Guidelines

OOPC is committed to minimizing the environmental impact of its operations and in implementing this policy will:

- Comply with all applicable environmental management laws and obligations; and other environmental requirements to which OOPC Subscribes.
- Implement and maintain an Environmental Management System across its global operations, conforming to the requirements of ISO 14001, as well as other relevant external certifications criteria and OOPC Standard Operating Procedures and Best Practices;
- Achieve continuous environmental improvement with objectives and targets so as to minimize our environmental footprint;
- Minimize or prevent land, air and water pollution through reduced use of chemical resource conservation, waste reduction, recycling and reuse and proper waste disposal in every area of activity;
- Prevent soil erosion and degradation through adoption of best practice in agricultural management;
- Minimize impacts on biodiversity across all aspects of our operations;
- Communicate and promote this Environmental Policy with the aim of ensuring that both employees (at all levels and functions of the organization) and business partners (including suppliers, contractors, joint venture partners and smallholders) are aware of the environmental impacts of OOPC activities as well as their individual obligations;
- Educate and train employees on environmental and related issues; and encourage their participation and cooperation to minimize adverse impact and protect the environment;
- Support our joint venture partners and small holders to adopt and implement these principles; and
- Periodically review this Environmental Policy to ensure it remains relevant and applicable to our business.
- Implementation of our GHG Emission Reduction Policy.

#### 4.0 Record of Approval

Task	Name/signature	Job title	Date
Approved by	Dr. Graham Hefer	Managing Director	10 JUL 2020 DR. G. HEFER





	Document title	Revision: 1
	<b>OKOMU OIL PALM COMPANY PLC</b>	Date: 11/06/2020
	<b>FIRE PREVENTION AND MANAGEMENT</b>	Page 1 of 1

## 1.0 Policy Statement

The prime purpose of this policy is to ensure maximum fire prevention within OOPC concessions and around its border lines.

## 2.0 Scope

The policy is applicable to all OOPC concessions, including those subsidiaries and third party suppliers.

## 3.0 Definitions

3.1 Dry Season-Period at the time of the year with little or no amount of rain fall.

3.2 TOC-Tactical Operation Centre

## 4.0 Guidelines

- OOPC has taken on an active role in mitigating the occurrence of haze in the region, through our commitment to no deforestation.
- This policy is supplemented with community education and awareness campaigns, as well as multi-stakeholder partnership to entrench sustainable practices throughout the industry.

### NO DEFORESTATION

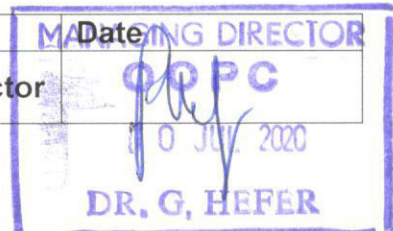
- One of the key tenets of the No Deforestation pillar is a strict Zero Burning Policy.
- We do not tolerate the use of fire in land preparation or development.
- Mechanical methods are employed in land development and wood debris is left to decompose. This returns nutrients back into the land and reduces the need for inorganic fertilisers, thereby also reducing the greenhouse gas footprint.


### ACTIVE FIRE MONITORING AND RAPID RESPONSE

- TOC (TOC 2 for Extension 2) is notified of any sign/fire sighted within OOPC concession and boundary areas through the emergency number.
- OOPC has a 24/7 fire monitoring system in place during dry season to alert us of fires in and around our concessions.
- OOPC has a well-established fire prevention and suppression programme to minimise the incident and impact of fire and haze.
- All OOPC concession is equipped with fire-fighting infrastructure and equipment, and staffed with an on-site fire brigade.
- Fire service personnel are trained to be vigilant and prepare to respond to fire incidences quickly and decisively.
- Regular meetings are conducted with neighbouring communities to inform and educate on fire prevention techniques.
- Fire extinguishers are located in various locations within OOPC concession.
- OOPC staff members are educated on the use of fire extinguisher annually.
- Regular audit is conducted with State Fire Service for proper inspection of fire-fighting equipment.
- HSE Manager is responsible for managing the fire brigade and this policy.

## 5.0 Record of Approval

Task	Name/signature	Job title	Date
Approved by	Dr. Graham Hefer	Managing Director	10 JUL 2020



	Document title	Revision: 1
	<b>OKOMU OIL PALM COMPANY PLC</b>	Date: 15/04/20
	<b>GENDER POLICY</b>	Page 1 of 2

## 1.0 Policy Statement

The Okomu Oil Company PLC (OOPC) is committed to maintaining a positive climate at work, in which individuals can work together in an environment free of all forms of violence, harassment, and discrimination on the basis of gender. OOPC strongly believes and supports gender equality and opposes any form of gender discrimination and violence at the workplace. The Company is therefore obligated in providing a safe work environment which is free from any kind of bias and harassment. The organization draws its source by upholding the constitutional mandate (section 17, 34, 35, Nigeria Constitution) and (Nigeria Labour Act 2004 section 73) to ensure the human rights of the people that are under its jurisdiction.

## 2.0 Scope

This policy applies to all employees, contractors (including temporary contractors and third party staff) of OOPC

## 3.0 Policy Requirement

The Gender Committee at OOPC has been set up with an objective of providing men & women an appropriate complaint mechanism against any inequality issue or unwelcome behavior in any manner. The policy suggests mechanisms that are accessible and will ensure confidentiality. It also serves as a system to ensure the fair, accountable and representative procedures for redressal and resolution. This Policy also defines the Physical, Psychological and Emotional harassment, physical or verbal form) by any gender and the mechanisms of redressal through the Committee by looking at the specific structures, needs and imperatives in OOPC. However, for female members, Sexual harassment is guided by the definition of Sexual Harassment given by the Nigeria law.

## 4.0 Objective

Okomu Oil Palm Company (OOPC) aims to fulfill its obligations under this policy by removing any barriers that prevent women from achieving equality and seek to protect the reproductive rights of women.

## 5.0 Scope


The policy applies to employees and contractors (including temporary contractors) of OOPC. This policy does not form part of any employee's contract of employment or contractor's services.

## 6.0 Definitions

Gender equality" means the equal rights, obligations, opportunities and liability of men and women in professional life, upon acquisition of education and participation other areas of social life; Equal treatment for men and women" means that there Shall be no discrimination whatsoever based on sex, either directly or indirectly;

- a. Direct discrimination based on sex" occurs where one person is treated less favorably on grounds of sex than another is, has been or would be treated in a comparable situation. Direct discrimination based on sex also means the less favorable treatment of a person in connection with pregnancy and childbirth, parenting, performance of family obligations or other circumstances related to gender, and sexual harassment;
- b. indirect discrimination based on sex" occurs where an apparently neutral provision, criterion or practice would put persons of one sex at a particular disadvantage compared with persons of the other sex unless that provision, criterion or practice is objectively justified by a legitimate aim, and the means of achieving that aim are appropriate and necessary;
- c. Harassment has been defined under the categories of Psychological Physical and emotional. The following shall constitute Harassment
  - When unwelcome acts like any visual, verbal or physical conduct such loaded comments, remarks or jokes, emails, letters, phone calls, text messages, gestures, physical contact, stalking, display of a derogatory nature or creating an intimidating, hostile or offensive environment.



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	<b>OKOMU OIL PALM COMPANY PLC</b>	Date: 15/04/20
	<b>GENDER POLICY</b>	Page 2 of 2

- Any unwelcome sexual advances, requests for sexual favors or any conduct of a sexual nature (Verbal or nonverbal conduct)
- Any action or comment/s (racial, ethnic, religious etc) which has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

#### 7.0 Guidelines

- To espouse the cause of the right to gender equality and right to dignified livelihood.
- To foster a social, physical and psychological environment that will enable employees to work productively.
- Capacity building for gender sensitization: We will organize workshops, training programs and discussions for promoting and enabling a gender sensitive work culture. Also, regular trainings will be conducted on awareness and confidence building of field staff, with special focus on women staff.
- Building skills and capacities on gender perspectives to enable greater participation of all sections of community in our programs will be one of our objectives in all programs.
- This policy would implement the sexual harassment, child labour and female reproductive policies of the Company.

#### 8.0 Role of the Gender Committee

The Committee's role will include of following:

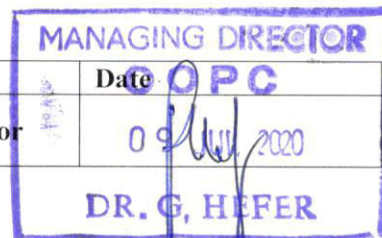
- To play a preventive role by making efforts towards sensitization of the staff on gender issues by conducting periodic programs and in house workshops/gathering.
- To take cognizance of complaints about Harassment, conduct proper enquiries, provide assistance and redressal to the victims, recommend penalties and action against harasser, if required.
- Ensure Safety and equality at all levels at the workplace.
- To recommend arrangements for appropriate emotional, psychological and physical support (in form of counseling and other assistance), if desired by the victim.
- Child care facilities to be provided by the growers and millers.
- Ensure vehicles are provided to breastfeeding mothers to take them to child care facilities to breastfeed their babies
- Women to be given specific break times to enable effective breastfeeding.
- The policy shall be reviewed annually.

#### 9.0 Procedures of Registering Complaints

To follow OOPC procedure GP 27 (Grievance Procedure) attached.

#### 10.0 Record of Approval

Task	Name/signature	Job title	Date
Approved by	Dr. Graham Hefer	Managing Director	09 JUL 2020



## 1.0 Policy Statement

OOPC monitors its greenhouse gas (GHG) emission and is constantly seeking for ways to reduce its carbon footprint in our plantation and industrial operations. We constantly strive to adopt best practices to reduce emission of carbon compounds in our palm plantations and oil mills. This is demonstrated in our optimal use of electricity from the national grid, and the use of the fresh fruiting bunch (FFB) fibre/kernel shells in our boilers. Further innovations to lower our carbon footprint include the installation of a steam turbine, which, together, enable the company to reach all of the GHG emissions reduction objectives, targets and timelines that have been adopted.

## 2.0 Scope

This policy applies to every area of our operations.

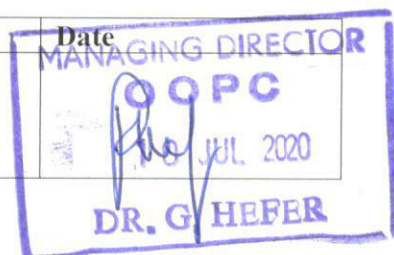
## 3.0 Guidelines

OOPC commits to:

- Constituting periodic green energy meetings aimed at reducing the use of fossil fuel in our operations.
- Identifying areas of significant GHG emissions and implementing plans to reduce or minimize them.
- Supporting the reduction of emissions from deforestation and forest degradation through the maintenance and protection of our forests.
- Conserving high carbon stock (HCS) forests and high conservation value (HCV) areas, and enhancing them where necessary.
- Minimizing the utilization of generation sets.
- Establishing a monitoring system to annually report our progress in reducing significant pollutants and emissions from our plantation and mill operations using palm GHG calculation from RSPO.
- Optimizing the use of FFB fibre/kernel shells in our boiler and increasing the use of the steam turbine as a priority over other alternative energy sources available to the company.
- Implementing our 'zero burning policy'.
- Reducing, recycling, reusing waste and disposing of waste, in an environmentally and socially responsible manner.
- Replacing regular light bulbs with more eco-friendly, compact fluorescent lights (CFL) in offices/production sites.
- Regular maintenance of all company's vehicles, road upkeep and to create shorter routes to mill and plantation fields thereby using less fossil fuels.
- Quarterly testing of ambient air quality.
- Reforestation of required areas in riparian areas which will be extracted from monitoring records.
- Since fertilizer is an important source of carbon, the plantation department will ensure fertilizer application is based on results of Annual foliar analysis and once in 5 years soil analysis results
- Setting Key Performance Indicator (KPI) for turbine use.

## 4.0 Record of Approval

Task	Name/signature	Job title
Approved by	Dr. Graham Hefer	Managing Director





## 1.0 Policy Statement

OOPC will provide a positive and supportive environment for all of its employees, visitors, contractors, third parties contractor and stakeholders, and as such will take every step to resolve issues within the workplace, and communities/stakeholders as quickly and efficiently, at the lowest possible level.

## 2.0 Scope

This policy is applicable to all stakeholders associated with OOPC.

## 3.0 Definitions

**Grievance Management:** is defined as a concern or complaint raised by an individual or group, in relation to activities undertaken by OOPC.

## 4.0 Guidelines

The following commitments will apply to OOPC's grievance management activities.

- In resolving conflicts, OOPC will avoid escalation of conflicts and prohibiting the usage of dogs and paramilitary in the organization.
- OOPC shall set up a process for recording and addressing external and internal grievances that are culturally appropriate (see OOPC grievance management procedure GP 27).
- OOPC shall establish and monitor a grievance management plan communicated in a way that it is accessible to all stakeholders.
- OOPC must commit to assess how grievances are received and responded to, based on the principles of transparency and accountability for all stakeholders.
- All stakeholders will be able to raise grievances without fear of reprisals, costs or retribution.
- OOPC will treat all matters with due confidentiality; individuals may report a grievance anonymously, although this blocks the access to engage them on a dialog in order to resolve or clarify the grievance.
- Grievances can be submitted through the Community Liaison Officer, Communication Officer or the following channels:

**By email:** [hsesec@okomunigeria.com](mailto:hsesec@okomunigeria.com)

**By telephone:** 08068774161

**In writing to:** Okomu-Udo Ovia South West LGA. P.M.B 1449, Benin City, Edo State  
Nigeria Attention: HSE Department (Grievance section)

- All grievances will be responded to within 15 days, either with a resolution or an update on progress if a resolution has not been found. All grievances should be resolved within 30 days or brought to the attention of the MD.
- OOPC shall decide and announce to the stakeholders the schedule for the periodic reporting on the management of the grievances received.
- This policy will be communicated to all stakeholders as per OOPC communication procedure GP 10.
- The HSE Manager shall control, monitor and manage all grievances on behalf of OOPC.

## 5.0 Record of Approval

Task	Name/signature	Job title
Approved by	Dr. Graham Hefer	Managing Director



## 1.0 Policy Statement

Respect for human rights is a fundamental value of OOPC. We strive to respect and promote human rights in accordance with the UN Guiding Principles on business and human rights in our relationships with our employees, suppliers and stakeholders. Our aim is to help increase the enjoyment of human rights within the communities in which we operate. This Human Rights policy elaborates on the requirement within our code of ethics policy to treat everyone at OOPC - and everyone with whom we come into contact - with fairness, respect and dignity. OOPC is committed to protecting individuals and their reports, complaints or disclosures filed in good faith. We also recognize that Human rights defenders work to promote transparent and accountable governments, clean and safe environments, fair working conditions, and equitable societies. They play a critical role in fostering corporate transparency and respect for human rights, such as monitoring of supply chains, exposing corruption, and protecting our shared environment. Based on this, we provide access to reliable channels to report wrongdoing; robust protection from all forms of retaliation; and mechanisms for reporting that promote reforms that correct legislative, policy or procedural inadequacies and prevent future wrongdoing. We also prohibit intimidation and harassment, including from security services/forces. This Policy is guided by the Universal Declaration of Human Rights, including those contained within the international Bill of rights and international labour organization's 1998 Declaration on Fundamental principles and rights at work, United Nations declaration on Human Rights Defenders, The International Covenant on Civil and Political Rights (explicitly referencing the protection of whistleblowing as an aspect of freedom of expression under Article 19), The International Covenant on Economic, Social and Cultural Rights; Convention on the Elimination of All Forms of Discrimination against Women (CEDAW); The International Labour Organisation's (ILO) Declaration on Fundamental Principles and rights to work; and RSPO Policy on the Protection of Human Rights Defenders, Whistleblowers, Complainants and Community Spokespersons.

## 2.0 Scope

This policy applies to all OOPC employees, contractors, service providers, and third party workers. It also covers the Human rights defenders (HRD), Environmental human rights defenders, whistleblowers and complainants within our stakeholders group, including community spoke persons. In implementing this Policy, we are subject to the laws of Nigeria and we are committed to complying with all such applicable laws. Our principle is that where national law and international human rights standards differ, we will follow the higher standard; where they are in conflict, we will adhere to national law, while seeking ways to respect international human rights to the greatest extent possible. Where local laws prohibit us from upholding certain aspects of this policy, we will comply with these local laws while continually seeking to respect and protect human rights. OOPC strives to prioritize the management of the human rights impacts of our business activities based on the operational context, our leverage and business relationships. As a result, we concentrate on our own operations and contractors/suppliers, most specifically on human rights related to labour conditions. OOPC, however, recognizes that other human rights may become greater priorities over time and we will regularly review our focus areas.

## 3.0 Definitions

**Adequate:** Capable of leading to the identification and punishment of those responsible

**Environmental Human Right Defenders:** Individuals and/or groups who, in their personal or professional capacity and in a peaceful manner strive to protect and promote human rights relating to the environment, including water, air, land, flora and fauna. They are characterized through their actions to protect environmental and land rights. Although they may work as journalists, activists or lawyers who expose and oppose environmental destruction or land grabbing, in many cases they are indigenous leaders or community members who defend their traditional lands against the harms of large -scale development projects.

**Human Rights Defenders (HRD's):** Individuals, groups or associations who promote and protect universally recognised Human Rights and contribute to the elimination of all forms of violations and fundamental freedoms of individuals and peoples. This definition does not include those individuals who commit or propagate violence.

**Impartial and independent:** Those responsible for carrying out the investigation must fair and not reliant only on the parties involved in the events under investigation;

**Prompt:** The investigation must be commenced swiftly and be completed within a reasonable time;

**Reasonable belief:** is defined as when a person could reasonably suspect wrongdoing in light of available evidence.

**Thorough:** Comprehensive in scope and – among other things – capable of identifying any systematic failures that led to the violation;

**Whistleblower:** Is anyone who exposes (reports) fraud, extortion, or sabotage to the relevant authority.



	Document title	Revision: 2
	<b>OKOMU OIL PALM COMPANY PLC</b>	Date: 02/10/20
	<b>HUMAN RIGHTS POLICY</b>	Page 2 of 2

#### 4.0 Guidelines

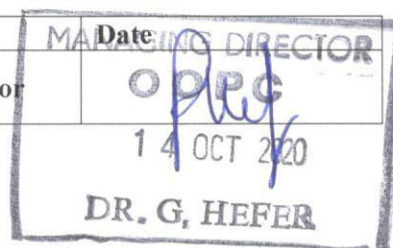
OOPC commits to:

- Recognize and respect the rights of all workers, including the workers of contractors, temporary workers or migrant workers. Our commitment is further manifested in policies such as the Code of Ethics Policy, Sexual Harassment Policy, Child Labour Policy, HIV/AIDS Policy, Safety and Healthy Workforce policy, Forced labour and Human Trafficking policy and amongst others.
- Conduct our business in a manner that respects the rights and dignity of all people whilst complying with all legal requirements.
- Treat everyone who works for OOPC fairly and without discrimination. Our employees, contractor staff and suppliers are entitled to work in an environment and under conditions that respect their rights and dignity.
- Respect freedom of association and ensure no forced, trafficked or bonded labour. Where our employees wish to be represented by workers unions, we will cooperate in good faith with the bodies that our employees collectively choose to represent them within the appropriate national legal frameworks.
- Recognize and respect the rights of local and indigenous communities by respecting their cultures, customs, values and land tenure rights. We commit to obtaining Free, Prior and Informed Consent from local communities before commencing new operations and commit to open, transparent, fair and equitable conflict resolution.
- Respect the rights of people in communities impacted by our activities and maintain a transparent and open dialogue with them. We will seek to identify adverse human rights impacts and take appropriate steps to avoid, minimize and/or mitigate them.
- Seek to make contractual commitments with contractors/suppliers that encourage them to adhere to the same principles.
- Ensure the provision of security is consistent with laws of Nigeria, using security services only where necessary and requiring the use of force only when necessary and proportionate to the threat.
- Continue to build the awareness and knowledge of our management, employees and contractors/suppliers on labour rights and this policy and encouraging them to speak up, without retribution, about any concerns they may have.
- Place importance on the provision of effective company-based grievance mechanism which is applicable to all stakeholders to ensure remediation of potential abuses. Any stakeholder with concerns regarding the human rights impacts of OOPC's activities may raise these through the grievance management process.
- Continue increasing the capacity of our management to effectively identify and respond to concerns.
- Grant protection for reports made by HRD with a **reasonable belief** that the information is true at the time it is disclosed.
- Protect individuals to safeguard the individuals' physical and psychological integrity and that of their family group, their property and working conditions; against violence, threats, all forms of retaliation, direct or indirect, pressure or any other arbitrary action as a consequence of the individual's legitimate exercise of their fundamental human rights in the course of their engagement with OOPC or as a result of their report against violation of human rights.
- Protect individuals from all forms of retaliation, disadvantage or discrimination (all types of harm, including but not limited to: dismissal, probation and other job sanctions; punitive transfers; harassment; reduced duties or hours; withholding of promotions or training; loss of status and benefits; and threats of such action) in workplace linked or resulting from HRD activities. OOPC seek to preserve the individual's confidentiality. The identity of the individual may not be disclosed without the individual's explicit informed consent.
- Ensure employees and workers have the right to decline to participate in corrupt, illegal or fraudulent acts.
- Provide protection against threat to individuals who have disclosed information anonymously including those who subsequently have been identified without their explicit consent.
- Ensure that any investigation is **adequate, thorough, impartial, independent and prompt**; and a sufficient element of transparency of the investigation or its result to ensure accountability.
- Ensure full range of remedies, covering all direct, indirect and future consequences of any reprisals.

The Human Resource Manager shall ensure implementation and monitoring of this policy

#### 5.0 Record of Approval

Task	Name/signature	Job title
Approved by	Dr. Graham Hefer	Managing Director





	Document title	Revision: 4
	<b>OKOMU OIL PALM COMPANY PLC</b>	Date: 11/06/2020
	<b>PROTECTION OF REPRODUCTIVE RIGHTS POLICY</b>	Page 1 of 1

#### 1.0 Policy Statement

OOPC has a strong guiding principle that the appropriate way to ensure equality in the workplace is to respect the reproductive rights of all, especially women.

#### 2.0 Objective

Okomu Oil Palm Company (OOPC) aims to fulfill its obligations under this policy by removing any barriers that prevent women from achieving equality and seek to protect the reproductive rights of women.

#### 3.0 Scope

The policy applies to employees and contractors (including temporary contractors) of OOPC. This policy does not form part of any employee's contract of employment or contractor's services.

#### 4.0 Definitions

4.1 **Reproductive rights:** legal rights and freedom relating to reproduction and reproductive health.

4.2 **Woman:** any member of the female sex irrespective of age or status.

#### 5.0 Guidelines


OOPC has devised the following measures to protect the reproductive rights of women and promote gender equality at work.

- Constitute a gender committee, which will include representatives from all departments of OOPC specifically to address areas of reproductive concern to women.
- Workplace consultation regarding issues relating to equal opportunity for all staff, contract workers and third party workers.
- Sensitization and awareness for women about their reproductive rights.
- Ensure that no work with pesticides is undertaken by pregnant or breast feeding women.
- Adequate space and paid breaks will be provided to enable mothers with infants 24 months or younger to breastfeed or express and store breast milk with privacy.
- OOPC shall comply with the Labour Act of Nigeria (2004), as amended, which ensures the rights of women to maternity protection and prohibits dismissal from work on account of her pregnancy status. OOPC also subscribes to the minimum standards of the International Labour Organization (ILO) Maternity Protection Convention (Revised), 1952 (No. 103), and the Maternity Protection Recommendation, 1952 (No. 95), stipulating that no woman shall be discriminated against on grounds of pregnancy and childbirth and women bearing a child shall be protected from dismissal on such grounds during the entire period of pregnancy and maternity leave. They shall have the right to resume their employment without loss of acquired rights.
- Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. However, where an employee has hinted her superior of her pregnancy on account of stress resulting from the pregnancy, the supervisor should communicate it to the manager who will then refer her to the company's doctor for a pregnancy test to be conducted. If confirmed that such employee is actually pregnant, a lighter alternative equivalent employment is offered to her without alteration of her pay.
- OOPC shall comply with the National Labour Act, allowing a woman employee (on medical certificate to take her confinement 6 weeks prior to delivery and to remain on confinement following delivery; protecting a pregnant woman from night work.
- The Grievance Management Procedure (GP27) should be followed if any of the above rights are perceived to have been violated.
- The HRD shall manage, monitor and oversee this policy.

#### 6.0 Record of Approval

Task	Name/signature	Job title
Approved by	Dr. Graham Hefer	Managing Director



	Document title	Revision: 2
	<b>OKOMU OIL PALM COMPANY PLC</b>	Date: 07/07/20
	<b>RECRUITMENT POLICY</b>	Page 1 of 2

## 1.0 Policy Statement

The Company's current recruitment policy is performed on a competitive interview and equal opportunity basis, regardless of sex, race, ethnicity, religion or political persuasion solely on merit, relevant qualifications and/or experience in collaboration with or on behalf of OOPC through certified labour brokers.

## 2.0 Scope

This policy is applicable to certified labour brokers for all recruitment processes on behalf of OOPC where the company requires the services of any person on a secondment basis. Where independent contractors and/or third parties require the recruitment of labour or staff, either directly or indirectly through labour brokers, then the contents of this policy are also applicable to them.

## 3.0 Definitions


- (i) **Direct Employment:** This is no longer an option in OOPC, but current employees who are employed as a staff of the company on this basis, are, as per their terms and conditions of employment, which includes confirmation after probation until the employment relationship is severed through resignation, retirement, redundancy, termination, dismissal or death.
- (ii) **Seconded Employees:** OOPC currently utilizes the services of Federal Government Ministry of Labour certified brokers to source an employee or a group of employees on behalf of OOPC under similar terms and conditions, to those stated in Clause 1.0 herein, and whom are, once chosen, then assigned to work for OOPC under similar terms and conditions to those employees denoted in Clause 3.0 (i). On expiry of the secondment term, for any of the reasons stated in Clause 3.0 (i) herein above, the employee (the 'seconded') will then return to their original employer (the 'Broker').
- (iii) **Temporary staff:** A person is designated a temporary staff when he /she is employed on a short-term basis, such as NYSC and Industrial Attachment (a maximum of 12 months at any given time). The company's terms and conditions of service are not applicable to temporary staff.

## 4.0 Recruitment Procedures

The procedure for employment into any of the above (i-iii) categories of staff shall be as follows:

- I. There must be a vacancy before a department could request for additional staff.
- II. The department wanting to fill a vacancy or requesting for additional staff, shall fill an employee's job requisition form stating reasons for the request, the job description and the required specification (Qualification)
- III. The department sends the completed job requisition form to the HR for processing and approval by the MD.
- IV. Upon approval by the MD, the HRD announces a job vacancy and solicits for applications from suitably qualified candidates.



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	<b>OKOMU OIL PALM COMPANY PLC</b>	Date: 07/07/20
	<b>RECRUITMENT POLICY</b>	Page 2 of 2

- V. The HR department invites short listed candidates to be interviewed, in conjunction with the Head of department where the vacancy exists.
- VI. The department would then fill a skill proficiency form for the successful/selected candidate which would be sent to the HR for processing and approval by the MD before an offer of employment is signed and issued to the candidate.
- VII. An acceptance of such offer of employment by the prospective employee implies an agreement on his/her part to abide by the terms and conditions of employment, as contained in his/her letter of employment.
- VIII. OOPC employment is based on equal opportunity, regardless of sex, race, ethnicity, religion or political persuasion. Prospective employees would be judged on merit, relevant qualification and experience.
- IX. OOPC shall endeavor to give the first right of employment to candidates within its neighboring communities, especially where one candidate is not from a neighboring community and the other candidate is, and where both candidates are equally qualified in all aspects for that vacancy. OOPC vacancy/vacancies will be placed on the community notice board and the community will provide OOPC with what they deem to be suitably qualified candidates for these vacancy/vacancies. In the event that the communities cannot provide suitable candidates that suit the existing vacancy, OOPC would make use of media outlets to source for suitable candidates to fill the existing vacancy. OOPC is at liberty to choose the mode of employment of the candidate as defined in clause 4

#### NOTE

- Provision of a Nigerian National Identity card is an added advantage.
- As stipulated in the Labour Act, 2004, as amended, of the Federal Republic of Nigeria, the minimum age for employment is 16. Article 3 of International Labour Organization (ILO) Minimum Age Convention 1973 (No. 138), states that the minimum age for admission to any type of employment or work which by its nature or the circumstances in which it is carried out is likely to jeopardize the health, safety or morals of young persons shall not be less than 18 years. Therefore, due to the various stipulations between Nigeria Law and ILO, the minimum age for employment in OOPC is 18.
- Medical fitness certificate must be conducted.
- No payment of any form of recruitment fee.

#### 5.0 Record of Approval

Task	Name/Signature	Job Title
Approved by	Dr. Graham Hefer	Managing Director



## **APPENDIX G**

### **Copy of Fire Prevention and Control Memo**

## **Provisions For Fire Prevention on the Estate**

### **ESTATE:**

Number of trained fire personnel = 11  
Number of fire truck (5000litres) = 1  
Number of water tanker attach to fire truck= 1  
Number of fire extinguishers = 178  
Number of water overhead tank = 1

### **OIL MILL:**

Number of fire personnel = 4  
Number of fire pumps = 1  
Number of water storage tank = 1  
Number of hose reel = 10  
Number of Hydrant = 3  
Number of smoke detectors = 11  
Number of fire blanket = 4  
Number of fire extinguishers = 57

### **RUBBER FACTORY:**

Number of fire personnel = 7  
Number of water storage tank = 1  
Number of hose reel = 9  
Number of landing valves = 9  
Number of smoke detectors = 14  
Number of fire blanket = 4  
Number of fire extinguishers = 32  
Number of fire truck (1800 liters) = 1

### **RUBBER ESTATE:**

Number of fire extinguishers = 92  
Number of overhead tanks = 1

### **MAIN ESTATE WORKSHOP:**

Number of fire extinguishers = 32  
Number of hose reel = 3

Number of smoke detectors = 13

### **ESTATE MAINTENANCE DEPT:**

Number of fire extinguishers = 12  
Number of hose reels = 3  
Number of smoke detectors = 13

### **MAIN ESTATE OFFICE:**

Number of fire extinguishers = 11  
Number of hose reel = 1  
Number of smoke detector = 23

### **HSE DEPARTMENT:**

Number of fire extinguishers = 2  
Number of smoke detectors = 4

### **IITA ESTATE:**

Number of fire extinguishers = 28  
Number of overhead tanks = 1

### **RUBBER PLANTATION OFFICE:**

Number of fire extinguishers = 4  
Number of smoke detectors = 8

### **MAIN ESTATE CLINIC:**

Number of fire extinguishers = 2  
Number of smoke detectors = 9

### **MANAGEMENT QUARTERS:**

Number of fire extinguishers = 37  
Number of smoke detectors = 48  
Number of fire blanket = 19

### **BOYS QUARTERS:**

Number of fire extinguishers = 7



## **APPENDIX I**

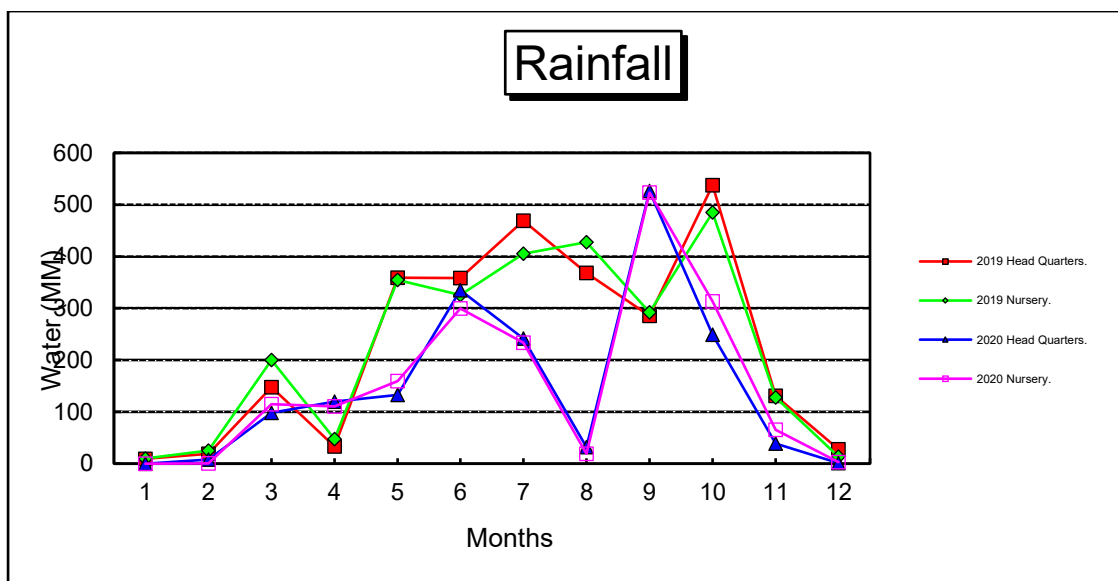
### **Meteorological Data**

### Rainfall Data at the Estate (2020)

Month	Rain Days	Rain fall in mm	Cumulated rainfall in mm to date	ETP	Balance end of month		Water deficit Cumulated to date	Water deficit Last year	
					Soil reserve	Water deficit		Month	Cumul
January	0	0.0	0.0	150		72.4		-140.5	-140.5
February	1	0.5	0.5	150		149.5		-130.9	-271.4
March	9	114.6	115.1	150		35.4		-2.3	-273.7
April	12	110.4	225.5	120		9.6		-116.4	-390.1
May	15	159.2	384.7	120		0.0		0.0	-390.1
June	15	299.4	684.1	120		0.0		0.0	-390.1
July	22	233.4	917.5	120		0.0		0.0	-390.1
August	3	19.1	936.6	150		0.0		0.0	-390.1
September	23	523.2	1459.8	120		0.0		0.0	-390.1
October	20	313.2	1773.0	120		0.0		0.0	-390.1
November	7	65.3	1838.3	150		0.0		0.0	-390.1
December	1.0	2.9	1841.2	150		31.8		0.0	-390.1
<b>Total Year</b>	<b>128</b>	<b>1,841.20</b>				<b>298.7</b>	<b>298.7</b>	<b>-390.1</b>	<b>-390.1</b>

### Rainfall Data at the Nursery (2020)

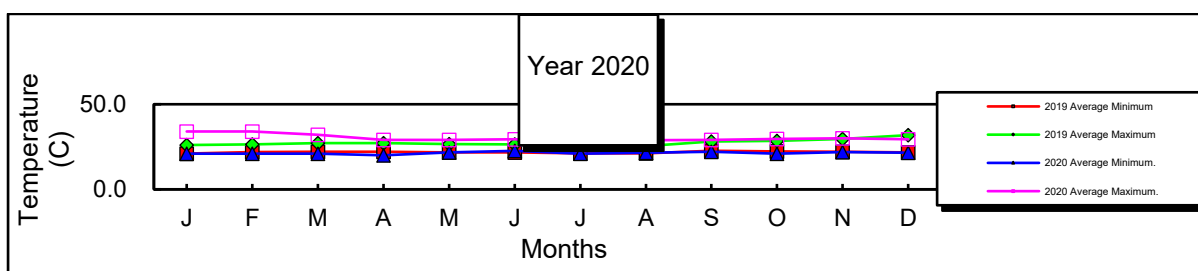
Month	Rain Days	Rain fall in mm	Cumulated rainfall in mm to date	ETP	Balance end of month		Water deficit Cumulated to date	Water deficit Last Year	
					Soil reserve	Water deficit		Month	Cumul
January	0	0.0	0.0						
February	1	7.8	7.8						
March	10	98.3	106.1						
April	12	120.1	226.2						
May	16	132.6	358.8						
June	16	334.9	693.7						
July	20	241.7	935.4						
August	3	32.2	967.6						
September	22	526.2	1493.8						
October	21	248.9	1742.7						
November	7	38.9	1781.6						
December	3	7.2	1788.8						
<b>Total Year</b>	<b>131.0</b>	<b>1788.8</b>				<b>0.0</b>	<b>0.0</b>		<b>0.0</b>



Temperature (Centigrade)

Date	Thermometer	
	Min.	Max
Dec-20		
Ave. this month	21.61	29.38
Absolute	20.00	31.00

Year 2020	J	F	M	A	M	J	J	A	S	O	N	D
Average Minimum	21.00	21.00	21.00	20.00	21.74	20.96	20.96	21.45	22.00	21.03	21.96	21.61
Average Maximum	34.00	34.00	32.00	29.00	29.00	27.90	27.90	28.90	29.10	29.58	29.90	29.38
Minimum Absolute	22	22	23	20	20	18	18	19	20	20	21	20
Maximum Absolute	32	32	30	31	32	30	30	30	38	31	31	31



## Sunshine Hours

Sunshine in Hours	
Dec-20	
Daily Average	

Year	J	F	M	A	M	J	J	A	S	O	N	D	Total
2008	138	119	239	155	142	264	119	42			77	177	1472
2009	157	195	169	158	155	123	126	66	120	130	159	199	1757
2010	158	219	106	182	152	133	121	87	73	121	197	197	1746
2011	105	203	176	205	139	79	38	84	97	102	223	146	1597
2012	134	149	168	192	163	111	73	96	101	153	184	199	1723
2013	172	195	192	145	132	81	59	68	67	161	157	209	1638
2014	186	137	138	139	131	74	52	56	57	123	185	200	1478
2015	164	170	118	119	144	68	62	43	36	148	190	175	1437
2016	139	75	149	144	120	73	59	32	105	132	167	174	1369
2017	156	235	163	139	156	79	42	39	74	134	207	135	1559
2018	113	105	201	155	123	96	39	81	96	169	209	206	1593
2019	193	115	196	132	132	88	41	52	51	105	207	225	1537
2020	225	128	122	134	144	104	56	78	21	116	187	198	1513
Av.10years	152.0	160.3	160.7	155.2	139.2	88.2	58.6	63.8	75.7	134.8	192.6	186.6	1,567.7

