

An Open Letter about the Environmental and Social Impacts of a Massive Oil Palm Development in Cameroon

To whom it may concern:

As established scientists with leading academic and research institutions around the world, we would like to express deep concerns about a proposed, massive oil palm development in Cameroon, Africa.

SG Sustainable Oils Cameroon, a subsidiary of American agribusiness corporation Herakles Farms, in collaboration with the American non-profit All for Africa, are planning a 70,000-hectare oil palm plantation in southwestern Cameroon. Having examined this project in detail, we question many of the claims and practices of the project proponents, especially their insistence that the “plantations will follow the highest environmental and social standards, complying fully with Roundtable on Sustainable Palm Oil Principles & Criteria.”¹ We believe that this plantation violates important RSPO rules and standards, and will have serious negative impacts on the biodiversity and people of southwestern Cameroon. Specifically, we assert that:

- The area proposed for the plantation, the Cross-Sanaga forest, is of exceptional ecological richness and diversity². This region, which occurs along the Cameroon-Nigeria border, has been recognized as a global center of biodiversity by the World Wide Fund for Nature³ and Conservation International⁴. Many groups of diverse and endemic species, such as primates, amphibians, birds, butterflies, and vascular plants⁵, would be imperiled by the vast plantation project.
- The proposed plantation is located within an ecologically vital area—one of the largest surviving tracts of lowland forest in the Gulf of Guinea. Moreover, the plantation would encompass virtually the entire area linking five crucial protected areas in the region: Korup National Park, Bakossi National Park, Banyang Mbo Wildlife Sanctuary, Nta Ali Forest Reserve and Rumpi Hills Forest Reserve. Its development would fragment the regional landscape and completely isolate the surrounding protected areas. Management plans for Korup National Park⁶ and Nta Ali Reserve⁷ have indicated that many animals, such as the threatened African elephant and chimpanzee and the endangered drill, actively use the proposed plantation area to forage and move among these protected areas.
- The project proponents have allegedly abused or violated Cameroon law⁸ by clearing forest and developing oil palm nurseries between January and June 2011, prior to submitting an Environmental and Social Impact Assessment to the Cameroon Government or obtaining a required Certificate of Environmental Conformity. Additionally, a Cameroon nongovernmental organization filed a motion in Cameroon courts to halt the proponents from continuing to remove forest and expanding their oil palm nurseries⁹. The courts sided with the plaintiff and ordered an immediate halt to the proponent’s illegal activities. The proponents have ignored this injunction, which

remains in effect today, and are continuing to clear native forest and develop their nurseries.

- In February 2012 another Cameroon nongovernmental organization published a detailed critique of the proponent's proposed plantation in February 2012 and presented the report in a press conference in Cameroon¹⁰. It cites many legal problems and ultimately claims that the establishment convention signed between the proponents and the Cameroon government violates Cameroon and international law.
- The proponents have clearly violated the guidelines of the RSPO, of which they are active members. They failed to submit a High Conservation Value Forest assessment to the RSPO prior to commencing clearing forest between January and June 2011, as evidenced by ground and aerial images taken of the nursery sites.
- The proposed plantation overlaps with the buffer zone around Bakossi National Park. According to the proponent's sustainability guide¹¹, "The company has set aside 3-kilometer buffer zones between the national parks and the area to be developed". However, maps in their Environmental and Social Impact Assessment indicate only a 100-meter-wide buffer zone adjacent to Bakossi National Park.
- The proponents have seriously misrepresented the state of the forests within their proposed plantation area and have misled the public into believing it unsuitable for most wildlife species. They claim that the "vast majority of the concession is secondary and degraded forest"¹² and that the concession area was selected because it was located on "land that had been previously logged."¹³ According to their own maps¹⁴, however, the vast majority of the Mundemba-Toko sector of the concession has *never* been logged. Based on 2008 satellite images, 56% of the proposed concession area in Ndian Division is dense native forest¹⁵. Furthermore, satellite images reveal that 71% of the proposed oil palm concession has at least 70% forest cover, a similar proportion to that of Korup National Park. Aerial photos of the Talangaye nursery taken in February 2012 show that even in the previously selectively logged areas, the surrounding forest is dense with a tall canopy.
- The proposed plantation, which foresees hiring 7000-8000 workers, will lead to substantial immigration into the plantation area. This will significantly increase demands for bushmeat, leading to increased hunting pressure in the surrounding protected areas. One of the most critical threats to biodiversity from large-scale development projects, such as the proposed plantation, is the increased bushmeat hunting in surrounding areas stemming from the influx of migrant workers^{16,17,18}. The proponents have very little experience working in west and central Africa and have failed to provide a sufficient mitigation plan to control the hunting, consumption, and trade of illegal bushmeat within their concession.
- The proponents' Environmental and Social Impact Assessment, including their analysis of High Conservation Value Forest, were poorly conducted and failed to evaluate adequately the flora and fauna of the proposed plantation area and the ecological and

social impact of the plantation. The proponents used inadequate sampling techniques, surveying plants and animals for only 22 days during the rainy season, when it is difficult to detect animals. They surveyed less than 0.003% of the concession area, an area far too small to provide a representative sample. Therefore, their conclusions reached regarding the state of the forest or the putative absence of threatened plant or animal species cannot be supported. Cameroonian and international scientists have sent letters to the Cameroon government detailing these and other concerns about the plantation and the problems with its Environmental and Social Impact Assessment.

- The nonprofit group All for Africa has seriously misled the public about the environmental benefits of the project. They have claimed that the oil palm plantation would help mitigate the effects of climate change by absorbing carbon dioxide. All for Africa failed to tell their donors that the project would remove large expanses of dense, high-canopy forest to plant oil palms, resulting in substantial carbon dioxide and particulate emissions. Oil palm plantations can only have a benefit in slowing climate change if they do not promote deforestation, especially in tropical regions where forests store large quantities of carbon¹⁹.
- The proponents have ignored a growing local opposition to their project. Letters from villages and local cultural organizations, representing hundreds to thousands of individuals, have decried the activities of the proponents. They cite an alarming lack of transparency; a lack of free, prior, and informed consent of local communities; the illegal demarcation and clearing of land; and the biological, economic, and cultural importance of the forests as reasons for opposing the proposed project.

Oil palm development is now one of the major threats to biodiversity in Southeast Asia and is quickly emerging as a threat in the Amazon and tropical Africa^{20,21}. We do not dispute that when oil palm plantations are established on previously deforested or abandoned lands and do not degrade nearby biologically rich areas, their environmental costs can be acceptable. The project proponents, however, have located their concession in the midst of a biodiversity hotspot on land that buffers and provides vital support functions to Korup and Bakossi National Parks, Rumpi Hills Forest Reserve, and Banyang Mbo Wildlife Sanctuary.

We have provided strong evidence that the project proponents have violated guidelines of the RSPO, skirted or allegedly violated Cameroonian law, and failed to take into account strong local opposition to their project. They also have distorted or misrepresented information about their proposed plantation and its impact on regional biodiversity and people. As such, we respectfully urge the RSPO to reject the proponents' request for certification.

If the proponents fail effectively to address our concerns and comply with RSPO principles and criteria, we ask that the proponents be removed as an active RSPO member. In our view as leading environmental and social scientists and development experts, the RSPO should use the proponents' case to send a clear message to agribusiness companies seeking to develop RSPO-certified oil palm plantations in Africa – that gross violations of RSPO guidelines and national and international laws will not be tolerated. Furthermore, we urge the Government of Cameroon

to void the proponents' Environmental and Social Impact Assessment and prohibit their further activities in Cameroon until these pressing concerns are resolved.

Thank you for your attention to our considered requests and recommendations.

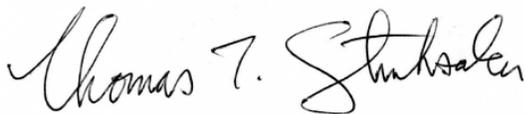
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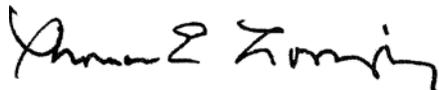
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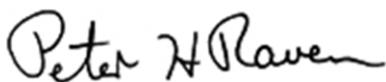
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- ¹ “Herakles Farms Develops Sustainable Palm Oil Plantations in Cameroon and Ghana,” Press Release, Herakles Farms, 15 June, 2011.
- ² Oates, J.F., Bergl, R.A., Linder, J.M., 2004. Africa’s Gulf of Guinea Forests: Biodiversity Patterns and Conservation Priorities. *Advances in Applied Biodiversity Science*, number 6. Conservation International, Washington D.C.
- ³ https://secure.worldwildlife.org/wildworld/profiles/terrestrial/at/at0107_full.html
- ⁴ http://www.biodiversityhotspots.org/xp/hotspots/west_africa/Pages/default.aspx
- ⁵ Bergl, R.A., Oates, J.F., and Fotso, R. 2007. Distribution and protected area coverage of endemic taxa in West Africa’s Biafran forests and highlands. *Biological Conservation* 134: 195-208.
- ⁶ MINEF. 2003. A Management Plan for Korup National Park and Its Peripheral Zone. Government of Cameroon.
- ⁷ MINEF. 2001. Management Plan for Nta-Ali Forest Reserve.
- ⁸ Procedures for the Conduct and Approval of Environmental Impact Assessments and Environmental Audits, Cameroon Ministry of Environment and Protection of Nature, April 2010.
- ⁹ High Court of Ndiang Division, Mundemba, Ruling No. HCN/003/2011/1M/2011.
- ¹⁰ Nguiffo, S. and Schwartz, B. 2012. Herakles’ 13th Labour? A Study of SGSOC’s Land Concession in South-west Cameroon. Center for the Environment and Development.
- ¹¹ Herakles Farms Sustainability Guide: Best Practices for Sustainable Oil Palm Cultivation and Palm Oil Processing, 2012.
- ¹² Summary Report of ESIA and HCV Assessments SG Sustainable Oils Cameroon: Nguti, Mundemba & Toko Subdivisions Republic of Cameroon.
- ¹³ SG Sustainable Oils Environmental Social Impact Assessment. Submitted by H&B Consulting, August 2011.
- ¹⁴ SG Sustainable Oils Environmental Social Impact Assessment. Submitted by H&B Consulting, August 2011.
- ¹⁵ Letter from the PSMNR-SWR co-coordinator to SG Sustainable Oils, 27 September 2010.
- ¹⁶ Noss, A.J. 1997. Challenges to nature conservation with community development in central African forests. *Oryx* 31: 180-188.
- ¹⁷ Oates, J.F. 1999. *Myth and Reality in the Rain Forest: How conservation Strategies are Failing in West Africa*. University of California Press, Berkeley.
- ¹⁸ Poulsen, J.R., Clark, C.J., Mavah, G., Elkan, P.W. 2009. Bushmeat Supply and Consumption in a Tropical Logging Concession in Northern Congo. *Conservation Biology* 23: 1597-1608.
- ¹⁹ H.K. Gibbs et al. 2008. Carbon payback times for crop-based biofuel expansion in the tropics: the effects of changing yield and technology. *Environmental Research Letters* 3:34001.
- ²⁰ Butler, R.A. and Laurance, W.F. 2009. Is oil palm the next emerging threat to the Amazon? *Tropical Conservation Science, Mongabay.com* 2: 1-10.
- ²¹ Wilcove, D.S. and Koh, L.P. 2010. Addressing the threats to biodiversity from oil-palm agriculture. *Biodiversity and Conservation* 19: 999-1007.