



Pro Wildlife · Engelhardstrasse 10 · D-81369 Munich

Open letter to
the chairs of RSPO
Mr. Carl Bek-Nielsen &
Ms Anne Rosenbarger

Clearing of High Conservation Value Forest in eastern Borneo / First Resources Ltd.

4 February 2021

Dear Mr. Bek-Nielsen, dear Ms Rosenbarger,

We would like to follow-up our email to you as of 17 November 2020, in which we expressed our serious concerns about recent clear cutting of 86 hectares of High Conservation Value Forest at the eastern coast of Borneo, habitat for several endangered wildlife species, by a subsidiary of the RSPO member First Resources Ltd.

In its correspondence with us First Resources Ltd. has argued that the scope of the RSPO Principles and Criteria would be limited to palm oil mills and plantations. While we regret that the scope of the 2018 RSPO P&C¹ indeed not explicitly names all steps of palm oil processing (including refineries) we do not at all agree with First Resources Ltd.'s interpretation:

- Deforestation of HCV areas clearly violates the vision and idea of the RSPO and clause 3.2 in the RSPO Code of Conduct, which states: *"Members to whom the P&C do not apply directly will implement parallel standards relevant to their own organisation, which cannot be lower than those set out in the P&C."*
- The Code of Conduct also highlights: *"It is fundamental to the integrity, credibility and continued progress of the RSPO that every member supports, promotes and works towards the production, procurement and use of Sustainable Palm Oil. All Ordinary and Affiliate Members must act in good faith towards this objective and commit to adhering to the principles set out in this Code."*

In case First Resources Ltd will be allowed to continue with its destructive practice – which will, as a next step, negatively affect the mangroves and coral reefs nearby, where a harbour/port is planned for the transport of the processed palm oil – it will also encourage other RSPO-member companies, which own neighbouring concessions, to follow the same path. The cumulative HCVF destruction to clear space for refineries, would result in an unprecedented destructive impact of the palm oil

¹ <https://rspo.org/resources/archive/1079>

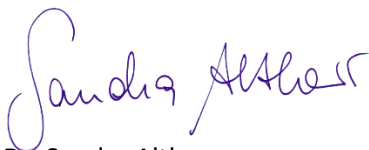
processing industry development. It has already been proven that palm oil related habitat loss in Balikpapan Bay represent the major threat for the population of the endangered proboscis monkeys advanced from plantations development to the development of the processing industry² and the industrial the development in the same area causes decline of the local population of marine mammals³.

We therefore feel it absolutely necessary that RSPO will adapt its P&C by expanding its scope to refineries in order to prevent any similar future cases of misinterpretation of the RSPO's requirements to produce sustainable palm oil. As we are aware that any formal change of the P&Cs will take some time to be prepared, organised, and agreed, we strongly urge RSPO to publicly clarify that the destruction of HCVF is not acceptable for RSPO members and their subsidiaries, including for refineries.

Please find attached our latest correspondence with First Resources Ltd.

We look forward to hearing from you in course and would ask you to reply within the next four weeks.

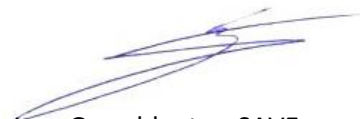
Yours sincerely,



Dr. Sandra Altherr,
Pro Wildlife



Marianne Klute,
Rainforest Rescue



Lars Gorschluter, SAVE –
Wildlife Conservation Fund

Cc Inke Van Der Sluijs, RSPO Europe
Michael Guindon, WWF Singapore & RSPO Board

² Toulec, T. *et al.* (2020): Shrimp farms, fire or palm oil? Changing causes of proboscis monkey habitat loss. *Global Ecology and Conservation* 21: e00863

³ Kreb, D. *et al.* (2020): Long-term population and distribution dynamics of an endangered Irrawaddy dolphin population in Balikpapan Bay, Indonesia, in response to coastal development. *Front. Mar. Sci.* 7: 533197