

## Response to SG Sustainable Oils Cameroon Oil Palm Project Responses to Comments Received by RSPO Thomas Struhsaker Comments of 1 March 2012

**Thomas T. Struhsaker, Ph.D.**

**30 March 2012**

The responses to my comments on this project sent to me by Carmine Farnan, Director SGSOC on 20 March 2012 do not, unfortunately, alleviate my concerns over the negative impact of this project on the biodiversity of the specific area, as well as the neighboring conservation areas.

Here are a few examples of why the responses of SGSOC fail to alleviate my concerns.

1) They claim that in the absence of SGSOC, the current human activities in the proposed project area will continue to increase, leading to adverse effects on biodiversity. Indeed, while any human activity is likely to have an adverse effect on species that depend on forest habitats, shifting cultivation and artisanal logging will have far less negative consequences than the large-scale forest removal involved in the SGSOC project. Species dependent on rain forests can survive in secondary forest, but not in oil palm plantations.

2) In terms of **mitigation**, SGSOC say that after removing all valuable timber, the remaining woody debris will be stacked as windrows, composted or used to generate steam and electricity onsite. They also say they are studying the potential to use some of the biomass to produce BioChar. In a typical logging operation relatively little of the harvested tree is actually removed for lumber. The great majority of the tree (often 70% of the biomass) is left behind as debris, including the branches, stump, and roots. Added to this debris will be all of the trees that are cut and left behind either because they are too small or of no commercial value for production of lumber. What this means is that after cutting down the forest and removing the boles of valuable trees for lumber there will be an enormous amount of woody debris, i.e. at least 50% of the forest woody biomass. I am trying to imagine how this will be stacked up as windrows. In any event, as this debris decomposes, whether composted or not, it will release a tremendous amount of CO<sub>2</sub>. Woody debris used to generate steam and electricity will also release CO<sub>2</sub>.

SGSOC states that the oil palm plantation will serve as a carbon sink and will capture some of the emissions from the clearing process. While an oil palm plantation certainly takes up carbon, this will not be appreciable until the trees reach at least juvenile size long after forest clearance. Furthermore, oil palm plantations are never as effective in terms of carbon sinks as are rain forests.

3) SGSOC claim that **bushmeat** is now scarce and not consumed much and that bushmeat is not preferred over domesticated meat in the entire region of the proposed project. To the contrary, there are a number of recent studies demonstrating that the

bushmeat trade is still very active and sought after, both within the region of the project and throughout Cameroon. A simple google search of “bushmeat trade Cameroon” provides a long list of articles verifying this, as will a visit to the LAGA website. These articles and website very clearly refute SGSOC’s claim.

SGSOC proposes a number of steps to control bushmeat hunting, but it is not at all apparent how they will prevent the increased demand for bushmeat resulting from the very substantial influx of workers to their plantation. This increased demand will result in increased hunting in the neighboring conservation areas, which, as rightly pointed out, are already understaffed. The SGSOC proposed plantation will only make matters worse for these conservation areas not only by increasing the demand for bushmeat, but by **fragmenting and reducing the forest corridors** between them.

4) The planned application of **pesticides** for use in the nurseries has the real potential of deleterious side effects through contamination of soil and streams via runoff. For example, Dursban (chlorpyrifos) is highly toxic to amphibians and fish, and its main breakdown product, chlorpyrifos oxon, is even more toxic.

Similarly, imidacloprid is highly toxic to bees. In fact, this pesticide has been implicated as one of the important factors contributing to the die off of honeybees in the USA.

5) The **ESIA and HCV assessment** by SGSOC remain inadequate despite the additional information provided. Rapid assessments, such as those done for SGSOC, are at the very best a rough and crude index of biodiversity and no substitute whatever for a thorough inventory. Even though rapid assessments have been used for decades, that does not make them accurate assessments and they should never form the basis for decisions regarding large-scale forest removal. A sample of only 0.003% of the area is not an adequate sample. Given the scale of forest destruction in this proposed project, nothing less than a full-scale inventory is imperative. One cannot draw any reasonable conclusions from their surveys nor justify clearance of 700 km<sup>2</sup> of forest.

6) SGSOC contends that the proposed plantation will use only a small portion of the total land area stretching from Mamfe to Idenau. 700 sq kms is not small and it will fragment and cut corridors between the various protected areas in this region.

7) SGSOC claim that their concession area does not include “areas that were scheduled or planned to be protected by the Government of Cameroon (GoC) under any short- or long-term plans” and that “No other large/small scale development (conventional or sustainable) options are planned or scheduled to be implemented in the area.” In fact, the eastern sector of the planned concession overlaps extensively with the previously planned Forest Management Unit (FMU) 11007 (maps and supporting documents available upon request). FMUs are classified as “permanent forests” by Cameroon law and are designed to sustainably manage the forest resources. Additionally, according to the Program Consultant for the Programme for Sustainable Management of Natural Resources in the South West Region of Cameroon (PSMNR-SWR), a development program of Cameroon in partnership with the German Development Bank (KfW) and GIZ, the SGSOC

concession overlaps with 1,010 ha of the MBACOF Community Forest. Thus, SGSOC statements continue to mislead the public.

8) SGSOC write that they have, “set aside a 3-km buffer between its concession and both the Korup National Park and Mt. Bakossi National Park.” However, according to their map on p. 4-107 of their ESIA, SGSOC is planning only a 100m buffer zone between their concession and Bakossi NP. Additionally, if SGSOC recognizes the biological importance of the Rumpi Hills Forest Reserve and Banyang Mbo Wildlife Sanctuary, why would they not also place a 3-km buffer zone between their concession and those protected areas?