

**Corrie Maccoll response to Global Witness, 25 May 2022 [Corrie Maccoll is a subsidiary of Halcyon Agri, which manages the group's plantations in Cameroon]**

*Global Witness (GW) assertion: We note that your company controls the Cameroonian subsidiaries Hevecam and Sudcam. According to our analysis these subsidiaries plantations contain 20,916 hectares of land that has been converted from natural forest to rubber plantation since 2000.*

Correct

*GW assertion: Hevecam plantations contain 3,686ha and Sudcam 16,816ha of land deforested since 2000. We note however that a proportion of this deforestation likely took place before your company's acquisition of these plantations.*

Correct. Halcyon took over management of the plantations in late 2016

*GW assertion: However, in the case of Sudcam 2,300 hectares of deforestation took place after your company acquired the plantation.*

Correct. Our management was informed that the land being cleared had already been logged meaning it was not primary forest. At the time of the Greenpeace report, Halcyon immediately called for a cease of all clearing until we conducted an investigation. No clearing has since been done and we have had a No Deforestation policy in Cameroon since December 2018. This is monitored annually by an independent satellite imagery provider. Our land in Cameroon is now, and will remain, 65% unplanted. This includes 25,000 hectares that we are currently in the process of protecting as a community forest.

*GW assertion: We further note, on the basis of interviews carried out with communities that there appears to be a widespread sense of disappointment in the communities of Bitye and Ndjikoum about a perceived failure of Sudcam to deliver schools and clinics which communities say they were promised.*

It is important to note that Sudcam engaged the local NGO, APIFED, to perform a community engagement with all the surrounding 42 communities. Built off the back of the grievances collected in that engagement, Sudcam, together with APIFED, developed a Social Action Plan which is a 5-year investment into the communities. The 42 communities are grouped into 9 'poles.' These poles (or groups) are represented by a 'Focal Point' (or leader) who was voted by the communities. These Focal Points meet monthly with APIFED and the Sudcam sustainability team to discuss the actions completed and the actions planned for that month. Each action is scheduled only after it has been mutually agreed at these meetings. The Social Action Plan provides support under the following 5 main headings:

- **Access to drinking water**, (Construction of boreholes (1 per community))
- **Education**, (Coverage of teachers' salaries, support for educational materials, payment of school fees and school materials for BAKA children)
- **Agriculture** (Support for agricultural equipment and inputs: plant protection products and seeds)
- **Health**, (Support for community health centres with equipment and medicines; payment of nurses' salaries;)

- Income generating projects

The agreed actions under the Education and Health support pillars for the BITYE and NDJIKOUM communities are being implemented and are as follows:

- Education: 33 teacher salaries are paid
- School fees for all BAKA children is paid (10 students in total)
- Educational materials are provided for all BAKA students (10 students in total)
- A total of 173 BAKA students are supported across all the communities
- Health: Nurse salaries for 2 health centers are paid.
- Medicines were provided free of charge until the health centers warned against it. This matter is currently being discussed with the communities on how best to proceed.

*GW assertion: Local people complained in particular about a lack of drinking water, saying that certain wells installed by Sudcam to replace water sources that have been swallowed up by the plantation are insufficient and, in some cases, have failed to function properly.*

There are 42 borewells scheduled for construction over the 5-year Social Action Plan (1 for each community). 7 borewells were completed in 2021, 11 are scheduled for 2022 with 6 already complete and the remaining 5 will start in September. The BITYE community benefitted from their borewell being completed last year while NDJIKOUM's borewell is scheduled for later this year. The construction schedule for these borewells is discussed in each monthly Focal Point meeting, as well as the confirmation of those complete. Last year, a borewell was constructed for the BITYE BAKA community (separate to the BITYE community). Unfortunately, the initial borewell stopped working after 2 days. A new borewell was constructed soon after and has been in operation since. As of now, all the borewells constructed under the Social Action Plan are fully operational, and this is reiterated in the Focal Point meetings.

*GW assertion: Local people believe there is a lack of a transparent 'cahier de charges' outlining what social infrastructures Sudcam has promised to build.*

Transparency has been a priority from the start. The Social Action Plan was developed off the back of grievances collected during the community engagement. The Plan was jointly put together by APIFED, the local communities and Sudcam. Completed tasks and scheduled tasks are discussed each month at the monthly Focal Point meetings, where the Focal Point for each group of communities was voted in by the communities themselves. We would welcome any further ideas on how we could increase the level of transparency throughout this process.