

Forest Conservation Policy

1. GAR wants to ensure that its palm oil operations have no deforestation footprint. Core to this is:
 - no development on high carbon stock forests
 - no development on high conservation value forest areas
 - no development on peat lands
 - free, prior and informed consent for indigenous and local communities
 - compliance with all relevant laws and National Interpretation of RSPO Principles and Criteria
2. We adopt a forest conservation policy for all the plantations that we own, manage or invest in regardless of the stake.
3. To promote this forest conservation policy across the palm oil industry, we will leverage our leadership position and advocate this policy in partnership with the Indonesian and global community.
4. **High Carbon Stock (“HCS”) Forests**
 - 4.1 For the purposes of this policy, we commit to [leading the investigation and to promoting the adoption of this new HCS concept](#), across the palm oil industry.
 - 4.2 We recognise that to conserve the HCS:
 - the Government of Indonesia plays a critical role particularly with respect to adopting new regulations and enacting relevant legislation so as to enable the transformation of the palm oil industry (including establishing and implementing a land swap process);
 - key players in the Indonesian palm oil industry should address the conservation policy with respect to HCS; and
 - civil society organisations, local and indigenous communities and other stakeholders must engage in the process to transform the palm oil industry.
 - 4.3 GAR will conduct fieldwork in collaboration with TFT and other stakeholders in the first half of 2011. During such fieldwork, a provisional definition of exceeding 35tC/ha will be used as HCS forest definition. We will share the [results of this fieldwork](#) when finalised. The provisional 35 tC/ha definition may change as applicable to the industry, and as a result of the fieldwork and after consultations with stakeholders.
5. **High Conservation Value Forest Areas and Peat Lands**
 - 5.1 In line with our 4 Feb 2010 commitments, we will ensure that there is no conversion of High Conservation Value (“HCV”) forest areas and we will not develop on any peat lands regardless of depth within our concessions. We will work with stakeholders to manage the ecological functions of peat in our concessions.

5.2 We will seek to conserve biodiversity, as part of our policy to protect HCV areas.

6. Free, Prior and Informed Consent for Indigenous and Local Communities

GAR respects and recognises the long term customary rights of the indigenous and forest dwelling communities to their traditional land and commits to ensuring free, prior and informed consent from these communities prior to commencing any operations.

7. Compliance with All Relevant Laws and RSPO Principles and Criteria

GAR will continue to comply with all relevant laws and regulations as well as RSPO Principles and Criteria in relation to forest conservation.

8. Monitoring and Evaluation

8.1 We understand that as new issues arise and new technologies become available, new policies and practices will need to be developed or adapted. We commit to maintaining an open learning approach to management and responding to new issues arising from monitoring and evaluation processes.

8.2 We commit to evaluating and reporting our performance regularly against this policy in a transparent manner through our [website](#), [annual CSR report](#) and on-going engagement with key stakeholders.

Developed by GAR in consultation with TFT
09 February 2011