

**GVL response to a draft version of ‘Golden Veroleum Liberia’s track record: broken promises and continued deforestation’ 1 August 2021**

Thanks for providing the draft report for GVL to review. While the scorecard is informative, it lacks details and context which are important for a reader to gain a truly meaningful insight into each theme highlighted. As part of our Sustainability Action Plan launched in 2018, GVL has also conducted a series of engagements with all relevant communities to audit and document the fulfilment of MOU commitments. Sustained and repeated discussions are required with each community to truly understand and agree on gaps in perception, interpretation and indeed fulfilment of MOU commitments. We would be cautious of drawing conclusions from a series of three meetings with three communities as you have indicated in your report.

A few examples could perhaps illustrate the above points:

1. Community Oil Palm / Outgrower Program

GVL is very much committed to this. However, as spelt out in clause 15.3 of the Concession Agreement between the Government of Liberia and GVL, this program needs to be done together with the Government. The Government’s obligations include providing land and to obtain sources of funding for the program. Recognizing constraints faced by the Government, GVL has explored implementing the program with other partners since 2016 but has been unable to proceed. The Community Oil Palm / Outgrower program remains a priority issue for GVL and we continue to explore viable ways to implement it with the Government and other potential partners.

2. Community Development / Employment

GVL’s recruitment policy is to consider qualified citizens first for every job vacancy. Our longer term vision and strategic intent is to groom Liberians and local citizens to eventually take on leadership and operational positions in the company. To that end, GVL now has 3 farms which are managed by Liberians and we have trained Liberian engineers and technicians to take on positions of responsibility in our mill in Tarjuowon. We believe we are on the right trajectory to increase the proportion of Liberian professionals and managers in the company.

3. Finalisation of MOUs

GVL has been engaging with the three communities mentioned since early 2019 for finalization. With mediation by the National Bureau of Concessions (NBC), we submitted drafts of the company’s input to the communities for their inputs, recommending this be done with guidance of their own legal counsel. NBC would then have served as a referee to help us agree on a Permanent MOU, by September 2019. However, to date the communities have not responded with their feedback. We understand that there are supporting NGOs which were ready to provide funding for legal counsel, but this was possibly affected by the COVID-19 pandemic. GVL is keen for this process to continue.

We hope that the above examples illustrate that the scorecard may not convey the complete picture of what is the current situation with respect to MOU fulfilment. We believe a better way to improve outcomes for communities is for SDI to engage constructively with GVL with the information which they have gathered from their meetings so that we are able to better understand the gaps and work towards closing them.

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SDI and Milieudéfense also received information that GVL claims it paid land rental fees to the three communities in our research by the end of July, just after GVL received our draft publication. SDI and Milieudéfense want to note that this research is part of sustained grassroots support to the three communities since 2017 and legal support since 2019. While GVL implies in its response that the scorecard is the result of just a few meetings. Community group exercises do not deliver good results if the latter would be the case. We therefore find it important to note that this is not a one off exercise. We also note that though frantic efforts have been made by communities requesting GVL to conduct a complete survey of already existing plantations estates to determine the number of hectares that have been cleared, those calls have not been heeded by the company.