



Unilever Position on the Draft RSPO GHG Criteria for Sustainable Palm Oil

This note summarises Unilever's response to the Roundtable on Sustainable Palm Oil's (RSPO's) public consultation on greenhouse gas (GHG) criteria, taking place 16 July - 10 September 2009.

Summary Unilever Position

- Emissions from Land Use and Land Use Change are the major contributors to greenhouse gas (GHG) emissions related to palm oil production. We therefore believe that these should be addressed as a priority.
- With regard to existing plantations, only those located on mineral soils should be considered for RSPO certification. This means RSPO certification should not cover palm oil plantations on peatland.
- Only new plantations established on land with a carbon (C) stock smaller than 35 t C /ha should be considered for RSPO certification.
- Future revisions of the RSPO criteria could focus on technology fixes for smaller GHG contributors eg Palm Oil Mill Effluent (POME) treatment, fertiliser use efficiency etc.
- The GHG principles and criteria should apply to both existing and future plantations so that GHG accounting for both is supported.

Appendix

Major areas where Unilever agrees (*additional suggestions shown in italics*)

- Section 3.2.5: We agree that there are opportunities for both **existing** and **new** plantations to reduce emissions from POME but Land Use and Land Use Change emissions should be prioritised. We have no preference as to which of the proposed options should be adopted for reducing emissions from POME.
- Section 3.2.6: We accept the suggestion that **new** 'oil palm [plantations] can only be developed where the carbon stock of the land is equal or lower than 35 tonnes carbon/ha' since a pragmatic threshold is required.

However we suggest that it should be explicitly recognised that this is not based on science; the suggestion is that equivalent carbon stocks will be sequestered in the first 25 year palm oil planting cycle, ie the time scale is commercially derived rather than, for example, the time needed to reach a new steady state equilibrium for soil carbon.

- Section 3.2.7: Unilever strongly supports the proposal that stipulates: 'No **new** plantings on peat after November 2009'.

However, Unilever disagrees with the suggested clause that would allow such developments in cases of 'pressing social needs' and we therefore suggest that no exemption should exist.

Major areas where Unilever disagrees

- Sections 3.2.6 & 3.3: We disagree with the proposal that 'where the carbon stock of the land to be converted is between 35 – 70 tonnes carbon/ha then conversion can occur if the amount of carbon exceeding 35 t/ha is compensated through a carbon compensation mechanism.'

*Unilever's proposal is that carbon offsetting might be appropriate for certain unavoidable emissions (eg those from a past land conversion). However, emissions from **new** plantations above 35 t C / ha should be avoided by NOT allowing new plantations on such high carbon areas.*

- Section 3.2.6: The working group proposal suggests that 'Carbon stocks shall be quantified through a systematic field assessment, eg in the framework of a High Conservation Value Forest assessment.' This is adequate for new plantations.

*However Unilever suggests that we also work towards agreement on methods to estimate the ongoing Land Use Change emissions from past land conversions to facilitate GHG accounting for palm oil produced on **existing** plantations.*

- Section 3.2.7: Unilever does not accept the assertion that 'for **existing** plantations on peat, GHG emissions from continuous peat oxidation are in fact unavoidable, and that emissions can in fact only be reduced by applying appropriate water management, in particular by maintaining high water tables.'

Unilever's view is that any drainage effects will be minor compared to overall emissions from continued cultivation on peat: we therefore propose a move out of peat altogether.

- Sections 3.2.7 & 3.3: Unilever does not agree with the proposal 'to develop guidelines for (acceptable) carbon compensation mechanisms' for **existing** plantations on peat.

Unilever does not agree with peat based systems. We therefore suggest they should not qualify for certification regardless of offsetting attempts.