



NaturAceites
Responsables por Naturaleza



Response to Allegations from Romero Initiative, ECCHR and Foodwatch

NaturAceites commitment to develop a responsible and sustainable operation recognizes the respect for human rights as one of our core values. Our progress and efforts towards ensure sustainability and human rights are publicly available in our annual [Sustainability Report](#), based on the Global Reporting Initiative Standards (GRI).

NaturAceites is aware of the recent report “In the shadow of the oil palm”, produced by the Christian Initiative Romero (**CIR**) and the grievances published by Foodwatch and the European Council for Constitutional and Human Rights (**ECCHR**). The accusations suggested our involvement in disregarding land rights, labor rights, and causing environmental pollution. The complaint specifically implicates NaturAceites in the supplying of palm oil to Walter Rau Lebensmittel, a producer for Edeka renowned for margarine and vegetable oil.

1. To address these concerns, we aim to communicate our response with our supply-chain partners and stakeholders, providing clarification on specific matters:
 - In January 2024, we received a communication through several clients, indicating that NaturAceites was mentioned in a statement by The European Center for Constitutional and Human Rights (**ECCHR**) and the consumer organization Foodwatch. The allegations pertain to a previous statement mentioned in a blog by the Romero Initiative (**CIR**). We have already addressed through our Compliance and Grievance Mechanism in June 2023 and in January 2024 (Case number 382)
 - On February 14th, 2024, NaturAceites received a request from Edeka under The Supply Chain/Due Diligence Act (LKSG), obliging Edeka to conduct a comprehensive risk analysis and risk assessment. In response, NaturAceites completed a questionnaire addressing human rights and environmental due diligence obligations and risks. Despite the non-mandatory nature of the questionnaire, NaturAceites chose to complete it with the goal to demonstrating transparency and ensuring compliance with its policies and best practices regarding human rights, environment, and labor rights.
 - Additionally, the compliance officer, responsible for the investigation process and the management of the Compliance and Grievance Mechanism, contacted the Romero Initiative with the aim of gaining a comprehensive understanding of the topics highlighted in the publication to understand the specific sources and cases that substantiate the claims. At the time of this statement and the conclusion of the investigation process, there has been no response from Romero, only an email indicating that they would evaluate our request.





- Communication was established with RSPO to provide clarifications regarding the events mentioned in the Romero report. RSPO, in turn, issued a statement making it clear that no formal complaint has been filed to date in RSPO's Complaint System concerning the allegations in Guatemala or Honduras mentioned ([RSPO Reponse to Member Allegations in Guatemala and Honduras - Roundtable on Sustainable Palm Oil \(RSPO\)](#))
- Currently, there are no legal processes related to human rights violations, land tenure issues, labor rights or environmental pollution against NaturAceites, as mentioned by ECCHR, Foodwatch or CIR.

As previously stated, our compliance officer undertook a comprehensive internal review and analysis of the mentioned statement, revealing the following findings that substantiate our position:

a. Land rights and responsible Growth and New Plantations

- i. Operations are carried out exclusively within the limit of NaturAceites legal property. We do not operate on third party lands or belonging to communities.
- ii. A comprehensive due diligence process has been completed for 100% of NaturAceites' properties to ensure their legal standing.
- iii. NaturAceites and its RSPO-certified supply chain have publicly committed to adhering to the New Planting Procedure established by the Roundtable for Sustainable Palm Oil (RSPO) standard. This includes the requirement for a Free, Prior, and Informed Consent (FPIC) procedure with neighbors and representative stakeholders for any responsible growth.
- iv. FPIC processes for existing plantations and new developments involve participatory mapping workshops with communities. These workshops aim to verify recognition of property limits and boundaries, ensuring the consent of neighbors.

b. Human Rights Policy Enforcement

- i. NaturAceites conducts an annual Human rights impact assessment, using the methodology of the Danish Institute for Human Rights. This assessment ensures compliance with our sustainability policy and values, respecting human rights, labor rights and land tenure. The results are [publicly available](#).
- ii. NaturAceites maintains positive and direct relationships with elected representatives of communities mentioned in the publications. These representatives, legally organized as Community Development Councils (COCODES in Spanish), engage in systematic local development roundtables. These discussions include addressing complaints related to land tenure, environment, and labor rights according to our Grievance Mechanism.



- iii. NaturAceites adheres to and enforces the Voluntary Principles on Security and Human Rights (VPSHR). The private security company we engage with ensures that since 2017, security agents and personnel do not use firearms. Agents receive on-site training on human rights and the proportional use of force. These efforts are traceable and enforceable through the contract between NaturAceites and the security company.

c. Labor Rights

- i. We conduct regular internal audits systematically to ensure compliance with our [Human Rights and Sustainability Policy](#), Labor Policy, and the national legal framework related to labor rights.
- ii. The Ministry of Labor conducts annual audits to verify compliance with Internal Work Regulations, ensuring labor conditions in our operations. These audits extend their scope to monitor labor rights, addressing issues such as respect for women, non-discrimination, and adherence to labor rights. This includes freedom of association, prohibition of forced labor and child labor, as well as evaluating conditions of employment and remuneration.
- iii. Labor Improvement Committees exist in each region, providing spaces where employees can submit requests related to working conditions and propose additional initiatives to support collaborators.
- iv. We have dedicated Gender Committees for women, reinforcing the rights and practices promoted by the company regarding respect for women.
- v. All workers are encouraged to report any risk situations to their immediate supervisor, labor representatives, and SSO (Safety, Security, and Occupational Health) personnel. This information is thoroughly considered in the analysis for implementing improvements.

d. Water Management and Responsible Use of Agrochemicals

- i. According to the World Resource Institute, the geographical regions where NaturAceites operates are not considered high-risk for water supply. The recorded rainfall in these areas adequately meets the agronomic water requirements for the plantations.
- ii. We conduct biannual participatory monitoring of water quality passing through our plantations. This involves collaboration with representatives from communities, government bodies, and environmental organizations such as Fundación Defensores de La Naturaleza and Asociación Balam. The results are openly shared with local authorities and stakeholders to ensure our operations do not negatively impact rivers and water quality.





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- iii. Third-party civil society organization FUNCAGUA conducted Water Footprint Audits in 100% of our mills. This process resulted in the establishment of targets for water reduction, increased efficiency, and responsible consumption. Progress has been reported annually since 2018.
 - iv. Our implementation of a biological and integrated pest control system has systematically reduced agrochemical usage by -74% compared to 2016, aligning with internationally recognized good agricultural practices. NaturAceites strictly enforces the prohibition of agrochemicals listed in the Rotterdam and Stockholm Conventions, World Health Organization 1A and 1B classifications, and Paraquat.
2. NaturAceites has been a certified member of the Roundtable for Sustainable Palm Oil (RSPO) since 2015. We uphold our commitment by undergoing third-party independent audits annually. These audits verify our compliance with environmental, social, labor, safety, and health standards for our workers, among other topics.
 3. We have successfully certified 100% of our owned plantations and mills according to the RSPO standard. Additionally, we are dedicated to extending this certification to cover 100% of third-party plantations by 2025, with an ongoing commitment to sustainability.
 4. Since 2021, we have consistently published a Public Sustainability Report, demonstrating our dedication to best practices. We ensure the alignment of this information with SPOTT requirements (Sustainability Policy Transparency Toolkit), a transparency assessment that evaluates the quality and disclosure level of our reporting on Environment, Social, and Governance (ESG) practices.
 5. NaturAceites, committed to transparency and in strict adherence to its policies, has showcased compliance to the RSPO standard, alignment with the No Deforestation, No Peat, No Exploitation (NDPE) policies of its clients, and exemplary practices and due diligence in human rights, environment, and labor rights.

Guatemala, March 2024



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