Earthworm Foundation’s (EF) Deep Dive Grievance work - SAFACAM (Cameroon)

Investigation of allegations relating to SAFACAM operations

Public summary of findings & recommendations
May 2024
BACKGROUND

SAFACAM, a subsidiary of the Socfin group growing oil palm and rubber, is located in the Dizangué district of Cameroon.

The Socfin group published its Responsible Management Policy in March 2017 and subsequently became a member of the Earthworm Foundation (EF). This policy, which was revised on March 30, 2022, is articulated around the following pillars: (i) commitment to local and rural development in Africa and Asia, (ii) commitment to employees and communities, (iii) commitment to our planet and (iv) transparency.

Despite the progress made so far in implementing its responsible management commitments, Socfin continues to receive environmental and social grievances from the international media and NGOs, even in cases where the Socfin group believes that it has published analysis and documented responses. The Socfin Group’s top management has decided to initiate specific investigations into these allegations and to draw up an action plan to deal with them. Earthworm Foundation was chosen to carry out these investigations, which are structured in two phases:

- Phase 1: SRC in Liberia and SOCAPALM Dibombari in Cameroon
- Phase 2: SAFACAM and SOCAPALM (Edéa, Mbongo & Mbambou) in Cameroon, LAC in Liberia, SAC in Sierra Leone, OKOMU in Nigeria, Socfin-KCD and Coviphama in Cambodia

This executive summary presents the synthesis of findings of the assessment carried out by Earthworm Foundation (EF) from December 11 to 16, 2023 in SAFACAM. The objectives of this mission were to:

1. Investigate the following allegations to gain a better understanding:
   - Extension of the concession without the consent of the communities;
   - Extending the concession without adequate compensation;
   - Plantation development outside the concession boundaries;
   - Lack of land for livelihood;
   - Intimidation and ill-treatment by security forces on plantations;
   - Sexual harassment & violence against women;
   - Destruction of ancestral tombs and sacred sites;
   - Water pollution;
   - Difficult access to drinking water;
Failure to meet commitments to support local communities in terms of infrastructure; education, care and health;
• Limited access to management positions for members of neighbouring communities;
• Limited access to unskilled employment for members of local communities.

2. Highlight factual evidence relating to each claim (substantiated or unsubstantiated).
3. Make recommendations for improvement.

**METHODOLOGY**

The team undertook a literature review and held meetings and exchanges with various stakeholders:

**Communities living near SAFACAM operations**

The EF team sent letters to each local community informing them of EF’s fact-finding mission, to solicit their participation in accordance with the principle of Free, Prior and Informed Consent (FPIC). These meetings were an opportunity to review concerns raised by the communities and to analyse evidence; this was done through group or individual exchanges and direct observations. The EF team was able to hold exchange meetings with the five communities bordering SAFACAM, namely: Beach, Dikola, Koungué Lac Ossa, Koungué Somsé, Nséppè Elog-Ngango.

**Local civil society organisations**

Civil society organisations who had made allegations were contacted by EF to inform them of the investigative activities and to gather evidence from them. These organisations exchanged views with the EF team, but did not wish to participate in the related field visits.

A public announcement at the start of Phase 2 of the investigations was made on the EF website to enable stakeholders to contact the investigation teams via the following email address: socfin.investigation@earthworm.org.

**Other stakeholders**

The investigation team also held meetings with SAFACAM employees and management team, members of the Gender Committee, security teams (GTTS, Africa Security and Spark Security) and the SAFACAM sustainability team.

EF also met with the administrative authorities, namely the Prefect of Sanaga Maritime and the Commander of the Dizangué Gendarmerie Brigade.
Site visits
The field visits enabled the team to validate, or not, information gathered during the document review or during individual or group interviews with the various stakeholders. Sites that the EF team visited include:

- SAFACAM’s medical centre and four first aid stations;
- Infrastructures such as schools, boreholes & workers’ camps;
- Plantations and waterways.
### RESULTS OF INVESTIGATIONS

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<th>Finding</th>
<th>Observations/Evidences</th>
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| Extension of concession without community consent | Unfounded | ▪ A map delimiting the extension zone is available.  
▪ A memorandum of understanding has been signed between community representatives and SAFACAM on the use of this area. | ▪ A memorandum of understanding has been signed between SAFACAM and community representatives, known as the ‘Ndonga Memorandum of Understanding’. |
| Extension of concession without adequate compensation | Partially founded | ▪ The summary list of compensation paid in 2012 and 2013 did not include all claimants. In March 2022, three new people received compensation.  
▪ The process of calculating compensation costs has shortcomings:  
  o The criteria for calculating compensation premiums in 2012 and 2013 are not known or documented (number of crop plants, ages, scales, etc.).  
  o Lists for crop identification and counting are not available.  
▪ There are disparities in the amount of compensation awarded to beneficiaries.  
▪ The record of the transaction, signed on October 13, 2020 by the Ndonga community and SAFACAM, was not endorsed by a third party (administration). | ▪ Certain documents relating to the extension and compensation process already exist:  
  o Compensation summary list;  
  o Mapping of the various uses identified by plot;  
  o Transcript of the meeting where indemnity payments were received by the beneficiaries;  
  o Minutes of consultation meetings between the Ndonga community and SAFACAM;  
  o The Decree granting the provisional concession of 2161ha15a04ca. |
| Plantation development outside concession boundaries | Founded | ▪ SAFACAM has expanded its plantations outside its boundaries in two locations in the concession’s southern zone. | ▪ Creation by the Senior Divisional officer of Sanaga-Maritime of a departmental commission to settle the dispute concerning the determination of boundaries of the Mouanko and Dizangué districts.  
▪ Follow-up letter from SAFACAM to the Senior Divisional officer on the status of the land dispute between Nséppé Elog-Ngango (Mouanko) and Dikola (Dizangué) - September 21, 2021  
▪ Signing of a regulatory MoU between SAFACAM and Dikola village on the plantation |
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| Lack of land for livelihoods           | Not determined | - Discussions with communities and a review of the High Conservation Value report on the issue of land scarcity revealed that land scarcity is actually due to a number of factors that vary from one community to another:  
  o Demographic growth accentuated by a large influx of internally displaced people.  
  o The presence of two agro-industrial companies in the area: SAFACAM and SOCAPALM (in the village of Dikola).  
  - The poor development of road infrastructure, which according to the communities does not allow access to other remote areas that could be used for farming.  
  - In the absence of a detailed study of community land use, the EF team has no factual basis on which to comment on the status of this allegation. | - The presence of SAFACAM has led some local residents to start growing oil palm to improve their living conditions.  
  - Some local residents have farms where other activities, such as growing food crops (cassava, plantain, chillies, etc.), are practiced.  
  - SAFACAM contributes to the training of young people through its support for IFER, an institute specializing in agronomic training. |
| Intimidation and ill-treatment by security forces on plantations | Unfounded | - Discussions with community members met by EF revealed that they do not feel intimidated by SAFACAM security guards. They are free to move about.  
  - The people involved in the security system are clearly identifiable.  
  - Night patrols are carried out in collaboration with the gendarmerie.  
  - The actions carried out by security guards are documented (monthly reports, handrails, etc.).  
  - Security guards are made aware of responsible management policies. | |
| Sexual harassment; Violence against women by armed guards | Partially founded | - During the visit, it was noted that SAFACAM does not use armed security guards to monitor the plantation, however, cases of sexual harassment of women by SAFACAM supervisors were reported during interviews. Other cases of violence against women by SAFACAM workers have been recorded by the Dizangué gendarmerie.  
  - Weaknesses are observed in the process of registering and handling complaints relating to gender issues: documentation, confidentiality, follow-up and support, compliance with deadlines. | - Existence of a Gender Committee.  
  - Existence of an internal policy on sexual harassment and gender equality.  
  - Display of communication materials in certain company offices (General Management, KM6 control room, etc.).  
  - Existence of recent activity reports 2022 - 2023 (awareness campaigns, conferences, Gender Committee meetings). |
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| Destruction of ancestral tombs and sacred sites | Unfounded | ▪ No community referred to the destruction of tombs and sacred sites.  
▪ The field sampling carried out by the EF team did not reveal any evidence of destruction of graves.  
▪ High Conservation Value studies have been carried out in the SAFACAM concession and the monitoring report produced by an external body is available. | ▪ Training of Gender Committee members on gender issues.  
▪ SAFACAM has a social worker on staff whose mission is to accompany and support people with personal, professional, family or social difficulties. |
| Water pollution | Not determined | ▪ The surface waters analysed were those of Lake Ossa, Lake Mboli and the Mbimbe River. A review of the results shows that:  
- The results of analyses carried out in 2021 by the approved laboratory show that the quality of these surface waters was compliant.  
- The results provided by the accredited laboratory show that in 2022 water quality was compliant, with the exception of the Mbimbé river, where acidity has been observed.  
- Analyses carried out in 2023 show that the quality of surface water was non-compliant (the Mbimbé River is acidic and enriched in nitrate, and Lake Mboli and Lake Ossa are acidic). According to the laboratory that carried out the analyses, the physico-chemical characteristics of surface waters are linked to several direct factors: human activity (possibly SAFACAM’s agricultural activity or the activity of local residents for e.g. laundry), but also climatic conditions including acid rain.  
- During our visit, we noted that the 6th basin of the lagoon associated with the oil mill does not discharge effluent outside the production site; however, effluent from the rubber plant is discharged into the environment via a basin not built by SAFACAM. | ▪ Regular analyses of surface water, boreholes and effluents are carried out by SAFACAM through approved laboratories.  
▪ Borehole water analysis results are communicated to local communities at bipartite meetings or awareness-raising events.  
▪ Lagoons consisting of six basins were built to treat the effluent from the oil mill.  
▪ Buffer zones have been set up around watercourses to limit the risk of chemical contamination. |
Earthworm Foundation report – SAFACAM fact-finding mission

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| Difficult access to drinking water for the village of Nsèppé Elog-Ngango (lack of a standpipe)       | Founded, but not the responsibility of SAFACAM due to community preferences | ▪ SAFACAM has provided the village of Nsèppé Elog-Ngango with a borehole. The results of water analyses for the Nsèppé Elog-Ngango village borehole in 2022 and 2023 show that the water quality is not compliant. SAFACAM proposed at the April 29, 2022 awareness-raising meeting that a new borehole be drilled in the Nsèppé Elog-Ngango village. However, the community preferred to build a cultural centre.  
▪ Our visit to the village and meetings with members of the community revealed that access to drinking water remains a major issue to be addressed. |
| Failure to meet commitments to support local communities in terms of education and healthcare infrastructure | Unfounded                                                              | ▪ Most riverside communities have benefited from a range of infrastructure projects: water towers, cultural centres, electrification, health centres, etc.  
▪ SAFACAM pays the salaries of 51 teachers at schools catering for both workers’ children and those of local community members.  
▪ Communities have access to first aid at first-aid posts and the SAFACAM medical centre (the Good Samaritan).                                                                                                                        |
| Limited access to management positions for members of riverside communities                               | Partially founded                                                      | ▪ Executive recruitment is carried out by specialized firms, who are obliged to publish job offers.  
▪ The review revealed that job offers for management positions are not communicated directly to communities by the company, which means that they are unable to apply.  
▪ The recruitment procedure has been explained to local communities, and awareness-raising sessions are held as required. These meetings are minuted. |
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<td>▪ In the recruitment process, the selection criteria used by human resources are often different from those used by the user department which is hiring (as in the case of the latest recruitment of a laboratory worker).</td>
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| **Limited access to unskilled employment for members of riverside communities** | Unfounded | ▪ Members of local communities are employed by SAFACAM both directly and indirectly (as subcontractors, temporary workers, etc.).  
▪ SAFACAM keeps a file tracking the employment of local residents.  
Job offers for unskilled positions are passed on to communities. |                                 |
## RECOMMENDATIONS

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| 1. Extension of concession without adequate compensation              | 1.1. Carry out a detailed analysis of the compensation process and document any weaknesses identified, with a view to setting up a mechanism to respond to any complaints.  
1.2 Have a third party (e.g. government administration) endorse the minutes of the transaction signed between the Ndonga community and SAFACAM, thereby putting an end to any claims or disputes relating to the compensation process; ensure their wide distribution.  
1.3 Ask authorities to validate a deadline after which no more compensation can be paid for development in this extension zone. |
| 2. Plantation development outside concession boundaries                | 2.1. Follow up with the administration on the ongoing clarification of boundaries between Dikola and Nseppe Elog-Ngango communities.  
2.2 Once boundaries are clarified, engage in specific consultations with the Dikola and/or Nseppe Elog-Ngango communities regarding the out-of-boundary development zones to the south of the concession; jointly define the status and management of this zone.  
2.3 Submit agreements reached with communities to the authorities for validation. |
| 3. Lack of land for livelihoods                                       | 3.1 Implement recommendations from the land tenure study done as part of the extension of the concession  
3.2. Continue to work with credible groups of entrepreneurs who could benefit from support in implementing their income-generating activities.  
3.3. Communicate transparently about subcontracting opportunities. |
| 4. Sexual harassment; violence against women by armed guards          | 4.1. Define and document selection criteria and appointment procedures for members of the Gender Committee.  
4.2. Develop and implement a procedure for managing cases of gender-based violence (reporting, investigation, disciplinary measures, follow-up, etc.).  
4.3 Improve the Gender Committee's communication tools for workers and the community (gender-related communication media, etc.).  
4.4 Ensure that all the company's employment levels are represented on the Gender Committee.  
4.5. Strengthen the capacity of Gender Committee members to manage cases of violence in the workplace (reception, investigation, follow-up, support, etc.).  
4.6. Train health auxiliaries at first-aid posts on gender issues to facilitate the recording, treatment and follow-up of cases of violence.  
4.7. Update the Gender Committee terms of reference to enable it to operate more effectively (scope of action).  
4.8. Provide the Gender Committee with a discreet and secure space to ensure confidentiality in the process of managing cases of violence (securing documents, interviewing victims, etc.).  
4.9. Carry out a gender analysis within the company and develop and implement an action plan which responds to the analysis. |
| 5. Water pollution                                                    | 5.1. Map all effluent discharge points.  
5.2. Map all water sampling points for analysis.  
5.3. Install the effluent treatment system at the rubber plant.  
5.4. Given the density of the hydrographic network, identify additional surface water sampling points within the concession, which will be subject to regular analysis, |
| Earthworm Foundation report – SAFACAM fact-finding mission |

| 6. Difficulties accessing drinking water in the village of Nsèppè Elog-Ngango (absence of a borehole) | considering the entry and exit points of the concession, in order to establish SAFACAM’s responsibility. |

| 6.1. Carry out a review of SAFACAM’s water supply infrastructure in order to implement appropriate corrective actions where possible. |
| 6.2. Pursue the drinking water supply process while exploring other drinking water supply opportunities such as accessing natural springs. |

| 7. Limited access to management positions for members of riverside communities | 7.1. Ensure that local communities are informed of all employment opportunities for both unskilled and managerial positions. |
| 7.2. Ensure that user departments comply with the content of the published offer when selecting candidates. |
| 7.3. Communicate on statistics regarding employment of members of local communities. |

**CONCLUSION**

This mission enabled us to gain a better understanding of the allegations made by the international media and local and international civil society. Factual evidence relating to each allegation was brought to light. Based on the sampling carried out by the EF team, five allegations were classified as unsubstantiated, two were substantiated, three were partially substantiated and two were classified as undetermined because the information available at the time of the visit was not sufficient to make a decision.

The communities we met recognize the efforts made by SAFACAM to build basic infrastructure (water towers/drills, electrification, construction of cultural hostels, etc.), and to communicate, (holding regular bipartite meetings, awareness-raising campaigns, etc.).

However, it should be noted that within the communities, there is a feeling of preferential treatment towards certain community members by SAFACAM through the awarding of service contracts. It is important for SAFACAM to communicate transparently about subcontracting opportunities and to encourage new entrepreneurs.

Taking on board and implementing the recommendations made following this fact-finding mission will enable SAFACAM to strengthen its dynamic engagement with stakeholders in a consultative and constructive approach.