### Compagnie des Bois du Gabon (CBG)

**Timber and pulp assessment**

**Total score:** 67.5%

**Latest update:** July 2019  
**Next scheduled:** July 2020

**About this company:** Compagnie des Bois du Gabon (CBG) is engaged in timber production, timber processing and manufacturing in Gabon.

**Landbank:** 568,543 hectares

**Thomson Reuters ticker:** Private company

**Bloomberg ticker:** Private company

**Activities:** Timber production, timber processing and manufacturing, trading and distribution

**Locations:** Gabon

**Headquarters:** Gabon

**Website:** [http://www.cbg-wood.com/](http://www.cbg-wood.com/)  
**Sustainability report (2018)**

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### Total:

| Total | 54 / 80 | 67.5% |

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#### Sustainability policy and leadership

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Score</th>
<th>Source</th>
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</thead>
<tbody>
<tr>
<td>1. Sustainable forestry policy or commitment for all its operations?</td>
<td>✓ 1 / 1</td>
<td>Source</td>
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<tr>
<td>2. Sustainability policy or commitment applies to all sourcing?</td>
<td>X 0 / 1</td>
<td>No source</td>
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<td>3. High-level position of responsibility for sustainability?</td>
<td>X 0 / 1</td>
<td>No source</td>
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<td>4. One or more board members have responsibility for sustainability?</td>
<td>X 0 / 1</td>
<td>No source</td>
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<td>5. Percentage or number of women board members?</td>
<td>X 0 / 1</td>
<td>No source</td>
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<td>6. Percentage or number of women in senior management team?</td>
<td>X 0 / 1</td>
<td>No source</td>
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<tr>
<td>7. Sustainability report published within last two years?</td>
<td>✓ 1 / 1</td>
<td>Source</td>
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<tr>
<td>8. Member of multiple industry schemes or other external initiatives to improve forest management or transparency?</td>
<td>✓ 1 / 1</td>
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</table>
9. Activities with government, NGOs or academic institutions to improve the sustainability of forest products?
The company has a collaboration with the Smithsonian Institute of Conservation Biology to perform research within the company's protected areas, and also has a collaboration between the Ministry of Water and Forests and WWF to protect big mammals in the surrounding areas of the Loango and Moukalaba-Doudou National Parks.

10. Climate risks assessment available?
No source

11. Natural capital assessment available?
No source

12. Lists countries and operations?
The company has forest concessions and one mill in Gabon.

13. Total area of natural forest designated for wood/wood fibre production (ha)?
568,543

14. Total area of forest plantation (ha)?
This indicator is disabled as the company has informed ZSL that it only produces wood/wood fibre from natural forests.

15. Area of plantation/natural forest within outgrower schemes (ha)?
This indicator is disabled as the company has informed ZSL that it doesn't use outgrower schemes for wood/wood fibre production.

16. Unplanted (areas designated for future development as plantation forest) (ha)?
This indicator is disabled as the company has informed ZSL that it only produces wood/wood fibre from natural forests.

17. Conservation set-aside and/or HCV area (ha)?
625 - The company protects an area of 625 ha for scientific research in collaboration with the Smithsonian Institute of Conservation Biology.

18. Area of Intact Forest Landscape (ha)?
No source

19. Number of Forest Management Units (FMUs)?
3

20. Maps of forest management units (FMUs)?
The company has only published a static map of its FMUs. In addition, maps are available on the Forest Atlas of Gabon, but for Gamba and Mandji only (i.e. two of three FMUs controlled).

21. Forest management plans available for all FMUs?

Summaries of Forest Management Plan are made publicly available via the FSC database. Full points have therefore been awarded for this indicator on the basis of the company's FSC certified landbank, which stands at 568,543 ha (100% of total operational area).

### 22. Monitoring of forest management plan implementation?
Summaries of Forest Management Plan are made publicly available via the FSC database. Full points have therefore been awarded for this indicator on the basis of the company's FSC certified landbank, which stands at 568,543 ha (100% of total operational area).

### 23. Company has provided valid legal documents to Open Timber Portal on use rights (at the time of SPOTT assessments)?
This indicator is disabled as the company's reporting broadly suggests that it doesn't operate in a geography currently covered by Open Timber Portal. Please note that ZSL has been unable to confirm this.

### 24. Company has provided valid legal documents to Open Timber Portal on forest management (at the time of SPOTT assessments)?
This indicator is disabled as the company's reporting broadly suggests that it doesn't operate in a geography currently covered by Open Timber Portal. Please note that ZSL has been unable to confirm this.

### 25. Company has provided valid legal documents to Open Timber Portal on timber harvesting (at the time of SPOTT assessments)?
This indicator is disabled as the company's reporting broadly suggests that it doesn't operate in a geography currently covered by Open Timber Portal. Please note that ZSL has been unable to confirm this.

### 26. Number of company owned pulp and paper mills?
This indicator is disabled as the company has informed ZSL that it doesn't own pulp or paper mills.

### 27. Maps or addresses of company owned pulp and paper mills?
This indicator is disabled as the company has informed ZSL that it doesn't own pulp or paper mills.

### 28. Number of company owned sawmills?
1 - The company has one sawmill

### 29. Maps or addresses of company owned sawmills?
The company published the geographic coordinates of its sawmill.

### 30. Number of supplier mills?
This indicator is disabled as the company has informed ZSL that it has no suppliers including outgrower scheme or independent suppliers.

### 31. Maps or addresses of supplier mills?
This indicator is disabled as the company has informed ZSL that it has no suppliers including outgrower scheme or independent suppliers.

### 32. Procedures to trace raw materials to country of harvest?
This indicator is disabled as the company has informed ZSL that it has no suppliers including outgrower scheme or independent suppliers.
### 33. Procedures to trace raw materials to FMU level?
This indicator is disabled as the company has informed ZSL that it has no suppliers including outgrower scheme or independent suppliers

### 34. Percentage of supply traceable to country level (above 80%)?
This indicator is disabled as the company has informed ZSL that it has no suppliers including outgrower scheme or independent suppliers

### 35. Percentage of supply traceable to FMU level (above 75%)?
This indicator is disabled as the company has informed ZSL that it has no suppliers including outgrower scheme or independent suppliers

### Deforestation and biodiversity

<table>
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<th>2 media reports</th>
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#### 36. Commitment to zero conversion of natural forest?
FSC Principles and Criteria (FSC-POL-01-004 V2-0 EN) require that conversion to plantations or non-forest land uses shall not occur, except in circumstances where there are clear, substantial, additional, secure, long term conservation benefits. Full points have therefore been awarded for this indicator on the basis of the company's FSC certified landbank, which stands at 568,543 ha (100% of total operational area)

#### 37. Zero conversion commitment applies to all sourcing?
This indicator is disabled as the company has informed ZSL that it has no suppliers including outgrower scheme or independent suppliers

#### 38. Commitment to minimise the impact of logging roads?

#### 39. Commitment to protect forest areas from illegal activities?
FSC Principles and Criteria (FSC-POL-01-004 V2-0 EN) require that forests are protected from illegal harvesting, settlement and other unauthorized activities. Full points have therefore been awarded for this indicator on the basis of the company's FSC certified landbank, which stands at 568,543 ha (100% of total operational area)

#### 40. Evidence of monitoring deforestation?

#### 41. Amount of deforestation recorded?
552 (0.1%) - The company reports 552 hectares of forest cover loss, due to the extension of village plantations within agricultural series (defined in the management plans and respecting customary rights) and the construction of roads and temporary storage yards. 552 hectares corresponds to 0.1% of the company's operational area (568,543 ha)

#### 42. Commitment to biodiversity conservation?
The protection of rare, threatened and endangered species and their habitats is covered by FSC Principles and Criteria (FSC-POL-01-004 V2-0 EN). Full points have therefore been awarded for this indicator on the basis of the company's FSC certified landbank, which stands at 568,543 ha (100% of total operational area)

#### 43. Examples of species and/or habitat conservation management?
The company conducts awareness workshops with local populations, monitoring activities and assessments within its concessions for the protection of large mammals.

### 44. Implementing a landscape-level approach to biodiversity conservation?

The maintenance and restoration of appropriate landscape values, including environmental and economic resilience is covered by FSC Principles and Criteria (FSC-POL-01-004 V2-0 EN). However, this commitment does not extend to active engagement with stakeholders outside of the Forest Management Unit. Half points have therefore been awarded for this indicator on the basis of the company's FSC certified landbank, which stands at 568,543 ha (100% of total operational area).

### 45. Identified species of conservation concern referencing international or national system of species classification?

The protection of rare, threatened and endangered species and their habitats is covered by FSC Principles and Criteria (FSC-POL-01-004 V2-0 EN). However, the use of an international or national system of species classification is not specified. Half points have therefore been awarded for this indicator on the basis of the company's FSC certified landbank, which stands at 568,543 ha (100% of total operational area).

### 46. Commitment to sustainably manage the use of non-timber forest products (NTFPs)?

The sustainable extraction of forest products and the use rights of local communities and indigenous peoples is covered by FSC Principles and Criteria (FSC-POL-01-004 V2-0 EN). Full points have therefore been awarded for this indicator on the basis of the company's FSC certified landbank, which stands at 568,543 ha (100% of total operational area).

### 47. Commitment not to use genetically modified organisms?

This indicator is disabled as the company has informed ZSL that it only produces wood/wood fibre from natural forests.

### 48. Commitment to conduct High Conservation Value (HCV) assessments?

FSC Principles and Criteria (FSC-POL-01-004 V2-0 EN) require that assessments are conducted to determine the presence of High Conservation Values. Full points have therefore been awarded for this indicator on the basis of the company's FSC certified landbank, which stands at 568,543 ha (100% of total operational area).

### 49. HCV commitment applies to all sourcing?

This indicator is disabled as the company has informed ZSL that it has no suppliers including outgrower scheme or independent suppliers.

### 50. Commitment to only use licensed High Conservation Value (HCV) assessors accredited by the HCV Resource Network’s Assessor Licensing Scheme (ALS)?

This indicator is disabled until sufficient number of HCV ALS licensed assessors are available for the location where the company operates.

### 51. High Conservation Value (HCV) assessments available?

Full points have therefore been awarded for this indicator on the basis of the company's FSC certified landbank, which stands at 568,543 ha (100% of total operational area).

### 52. High Conservation Value (HCV) management and monitoring plans available?

Full points have therefore been awarded for this indicator on the basis of the company's FSC certified landbank, which stands at 568,543 ha (100% of total operational area).

### 53. Commitment to the High Carbon Stock (HCS) Approach?

This indicator is disabled as the company has informed ZSL that it only produces wood/wood fibre from natural forests.
### 54. High Carbon Stock (HCS) assessments available?
This indicator is disabled as the company has informed ZSL that it only produces wood/wood fibre from natural forests.

### 55. Commitment to conduct social and environmental impact assessments (SEIAs)?
FSC Principles and Criteria (FSC-POL-01-004 V2-0 EN) require assessment of environmental impacts and the incorporation of evaluations of social impact into management planning and operations. Full points have therefore been awarded for this indicator on the basis of the company's FSC certified landbank, which stands at 568,543 ha (100% of total operational area).

### 56. Social and environmental impact assessments (SEIAs) available?
This indicator is disabled as the company's reporting broadly suggests that it doesn't operate in a geography currently covered by Open Timber Portal. Please note that ZSL has been unable to confirm this.

### 57. Company has provided valid legal documents to Open Timber Portal on impact assessments (at the time of SPOTT assessments)?
This indicator is disabled as the company's reporting broadly suggests that it doesn't operate in a geography currently covered by Open Timber Portal. Please note that ZSL has been unable to confirm this.

### 58. Commitment to best management practices for soils and/or peat?
The company has confirmed that it does not have operations on peatland. The conservation of soils, including control of erosion and minimising damage during operations is covered by FSC Principles and Criteria (FSC-POL-01-004 V2-0 EN). Full points have therefore been awarded for this indicator on the basis of the company's FSC certified landbank, which stands at 568,543 ha (100% of total operational area).

### 59. Commitment to reduced impact logging?
FSC Principles and Criteria (FSC-POL-01-004 V2-0 EN) requires the avoidance of damage to forest resources and the preparation of written guidelines to minimise forest damage during harvesting. Full points have therefore been awarded for this indicator on the basis of the company's FSC certified landbank, which stands at 568,543 ha (100% of total operational area).

### 60. Commitment to no planting on peat of any depth?
This indicator is disabled as the company has informed ZSL that it doesn't have landbank on peat.

### 61. Commitment on peatland planting applies to all sourcing?
This indicator is disabled as the company has informed ZSL that it only produces wood/wood fibre from natural forests.

### 62. Landbank or planted area on peat (ha)?
This indicator is disabled as the company has informed ZSL that it doesn't have landbank on peat.

### 63. Evidence of best management practices for soils and/or peat?
This indicator is disabled as the company has informed ZSL that it only produces wood/wood fibre from natural forests.

### 64. Commitment to zero burning?
This indicator is disabled as the company has informed ZSL that it only produces wood/wood fibre from natural forests.
65. Commitment to zero burning applies to all sourcing?
This indicator is disabled as the company has informed ZSL that it has no suppliers including outgrower scheme or independent suppliers

66. Evidence of management and monitoring fires?
FSC Principles and Criteria (FSC-POL-01-004 V2-0 EN) require that measures are taken to prevent and minimize outbreaks of fire. However, monitoring and management measures are not specified. Half points have therefore been awarded for this indicator on the basis of the company’s FSC certified landbank, which stands at 568,543 ha (100% of total operational area)

67. Details/number of hotspots/fires in FMUs controlled by the company?
The company has not identified any fire within its FMUs for the last twenty years (as of June 2019)

68. Time-bound commitment to reduce GHG emissions intensity?
2,030 - The company states that it will aim to reduce GHG emissions by 2030, but does not specify the reduction targeted

69. Progress towards reducing GHG emission intensity?

70. Report GHG emissions from land use change?
This indicator is disabled as the company has informed ZSL that it only produces wood/wood fibre from natural forests

71. Methodology used to calculate GHG emissions?

72. Time-bound commitment to improve water quality (BOD and COD)?
The company only has a general commitment to maintain water quality. No time-bound commitment to BOD and COD is provided

73. Progress towards commitment on water quality (BOD and COD)?

74. Commitment to protection of natural waterways through buffer zones?

75. Evidence of treatment of pulp and paper mill effluent?
This indicator is disabled as the company has informed ZSL that it doesn’t own pulp or paper mills

76. Evidence of sawmill run-off containment and wastewater treatment?

77. Time-bound commitment to improve water use intensity?
This indicator is disabled as the company has informed ZSL that it doesn’t own pulp or paper mills
| 78. Progress towards commitment on water use intensity? | This indicator is disabled as the company has informed ZSL that it doesn’t own pulp or paper mills |
| 79. Commitment to eliminate chlorine and chlorine compounds for bleaching? | This indicator is disabled as the company has informed ZSL that it doesn’t own pulp or paper mills |
| 80. Commitment to minimise the use of chemicals, including pesticides and chemical fertilisers? | ✓ 1/1 Source |
| | FSC Principles and Criteria (FSC-POL-01-004 V2-0 EN) require the adoption of environmentally friendly non-chemical methods of pest management and avoidance of the use of chemical pesticides and fertilisers. Full points have therefore been awarded for this indicator on the basis of the company’s FSC certified landbank, which stands at 568,543 ha (100% of total operational area) |
| 81. No use of World Health Organisation (WHO) Class 1A and 1B pesticides? | ✓ 1/1 Source |
| | FSC Principles and Criteria prohibit the use of World Health Organization Type 1A and 1B and chlorinated hydrocarbon pesticides. Full points have therefore been awarded for this indicator on the basis of the company’s FSC certified landbank, which stands at 568,543 ha (100% of total operational area) |
| 82. No use of chemicals listed under the Stockholm Convention and Rotterdam Convention? | ✓ 1/1 Source |
| | FSC-STD-30-001 v1-0 8.1 prohibits the use of chemicals listed under the Stockholm Convention and Rotterdam Convention. Full points have therefore been awarded for this indicator on the basis of the company’s FSC certified landbank, which stands at 568,543 ha (100% of total operational area) |
| 83. Integrated Pest Management (IPM) approach? | ✗ 0.5/1 Source |
| | FSC Principles and Criteria (FSC-POL-01-004 V2-0 EN) requires the adoption of environmentally friendly non-chemical methods of pest management and avoidance of the use of chemical pesticides and fertilisers. However, specific provisions are not set out for natural forest operations. Half points have therefore been awarded for this indicator on the basis of the company’s FSC certified landbank, which stands at 568,543 ha (100% of total operational area) |
| 84. Chemical usage per ha or list of chemicals used? | ✓ 1/1 Source |
| | 0 |
| 85. Commitment to human rights, referencing the UN Declaration on Human Rights or UN Guiding Principles on Business and Human Rights? | ✓ 1/1 Source |
| | The company has committed to not be directly or indirectly involved in the violation of human rights in forestry operations. This commitment is made through the FSC Policy for Association (FSC-POL-01-004), which defines human rights as those established through the UN Declaration of Human Rights |
| 86. Commitment to human rights applies to all sourcing? | This indicator is disabled as the company has informed ZSL that it has no suppliers including outgrower scheme or independent suppliers |
| 87. Commitment to respect indigenous and local communities' rights? | ✓ 1/1 Source |
| | The company has committed to not be directly or indirectly involved in the violation of human rights in forestry operations. This commitment is made through the FSC Policy for Association (FSC-POL-01-004), which encompasses the rights of Indigenous and Tribal Peoples as established through the ILO Convention 169 |
88. Commitment to respect legal and customary property rights?  
✓ 1 / 1 Source

89. Commitment to free, prior and informed consent (FPIC)?  
P 0.5 / 1 Source
FSC Principles and Criteria (FSC-POL-01-004 V2-0 EN) require that free, prior, and informed consent is obtained. However, this commitment does not extend beyond the Forest Management Unit. Half points have therefore been awarded for this indicator on the basis of the company's FSC certified landbank, which stands at 568,543 ha (100% of total operational area).

90. FPIC commitment applies to independent suppliers?  
This indicator is disabled as the company has informed ZSL that it has no suppliers including outgrower scheme or independent suppliers.

91. Details of free, prior and informed consent (FPIC) process available?  
✗ 0 / 1 No source

92. Examples of local stakeholder engagement to prevent conflicts?  
✓ 1 / 1 Source
The company has developed a conflict management procedure and has shared it with local communities. The company also has a social mediator that serves as interlocutor with local communities.

93. Details of process for addressing land conflicts available?  
P 0.5 / 1 Source
FSC Principles and Criteria (FSC-POL-01-004 V2-0 EN) require appropriate mechanisms are employed to resolve disputes over tenure claims and use rights. However, details of the process used for resolving land conflicts are not recorded. Half points have therefore been awarded for this indicator on the basis of the company's FSC certified landbank, which stands at 568,543 ha (100% of total operational area).

94. Commitment to support the inclusion of women across forestry operations, including addressing barriers faced?  
P 0.5 / 1 Source
The company commits to support the inclusion of women across forestry operations, providing responses to barriers faced, but no details are available on responses and support provided.

95. Commitment to provide essential community services and facilities?  
✓ 1 / 1 Source

96. Company has provided valid legal documents to Open Timber Portal on population rights (at the time of SPOTT assessments)?  
This indicator is disabled as the company's reporting broadly suggests that it doesn't operate in a geography currently covered by Open Timber Portal. Please note that ZSL has been unable to confirm this.

97. Commitment to respect all workers' rights?  
✓ 1 / 1 Source

98. Reference to Fundamental ILO Conventions?  
✓ 1 / 1 Source

99. Commitment to eliminate gender related discrimination with regards to employment and occupation?  
✓ 1 / 1 Source

100. Company has provided valid legal documents to Open Timber Portal on labour regulations (at the time of SPOTT assessments)?  
This indicator is disabled as the company's reporting broadly suggests that it doesn't operate in a geography currently covered by Open Timber Portal. Please note that ZSL has been unable to confirm this.
### 101. Percentage or number of temporary employees?
This indicator is disabled as the company has informed ZSL that it doesn't have temporary employees.

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### 102. Percentage or number of women employees?
56 (8.2%) - The company reports having 56 women among 680 employees (8.2%)

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### 103. Payment of minimum wage?

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### 104. Reporting of salary by gender?

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### 105. Commitment to address occupational health and safety, referencing the ILO Code of Practice on Safety and Health in Forestry Work?
FSC Principles and Criteria (FSC-POL-01-004 V2-0 EN) require that all applicable laws and/or regulations covering health and safety of employees and their families are met or exceeded. FSC-POL-30-401:200 requires that the ILO Code of Practice on Safety and Health in Forestry Work is also applied. Full points have therefore been awarded for this indicator on the basis of the company's FSC certified landbank, which stands at 568,543 ha (100% of total operational area).

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### 106. Time lost due to work-based injuries?
23 - The company reports 23 work-based accidents and a total of 854 days off work for the year 2018

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### 107. Number of fatalities as a result of work-based accidents?
1 - The company reports one fatality during the year 2018

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### 108. Provision of personal protective equipment and related training?
This indicator is disabled as the company has informed ZSL that it doesn't have physical possession of the traded product.

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<th>1 media report</th>
<th>5 / 5</th>
<th>100%</th>
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### 109. Time-bound plan for achieving 100% third-party legality verification of FMUs or achieved?
The company is 100% FSC-FM certified (target already met).

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### 110. Time-bound plan to source only wood/wood fibre that is in legal compliance verified by a third party?
This indicator is disabled as the company has informed ZSL that it has no suppliers including outgrower scheme or independent suppliers.

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### 111. Percentage area (ha) verified as being in legal compliance by a third party?
100%

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<th>Source</th>
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### 112. Percentage of all wood/wood fibre supply traded/processed verified as being in legal compliance by a third party?
This indicator is disabled as the company has informed ZSL that it has no suppliers including outgrower scheme or independent suppliers.

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113. Time-bound plan for achieving 100% FSC FM certification of FMUs or achieved 100% FSC-certification of FMUs?
The company is 100% FSC FM certified since 2009

114. Commitment to source only wood/wood fibre that meets FSC Controlled Wood requirements?
This indicator is disabled as the company has informed ZSL that it has no suppliers including outgrower scheme or independent suppliers

115. Percentage area (ha) FSC FM certified?
568,543 (100%)

116. Percentage of wood/wood fibre supply from outgrower scheme and/or independent suppliers that is FSC FM certified?
This indicator is disabled as the company has informed ZSL that it has no suppliers including outgrower scheme or independent suppliers

117. Percentage of all wood/wood fibre supply traded/processed that are FSC certified (above 75%)?
This indicator is disabled as the company has informed ZSL that it has no suppliers including outgrower scheme or independent suppliers

118. Percentage area (ha) PEFC certified (excluding FSC certified area)?
The indicator is disabled as the company is 100% FSC certified

119. Programme to support outgrower scheme smallholders?
This indicator is disabled as the company has informed ZSL that it has no suppliers including outgrower scheme or independent suppliers

120. Percentage of outgrower scheme smallholders involved in programme?
This indicator is disabled as the company has informed ZSL that it has no suppliers including outgrower scheme or independent suppliers

121. Process used to prioritise, assess and/or engage suppliers on compliance with company’s policy and/or legal requirements?
This indicator is disabled as the company has informed ZSL that it has no suppliers including outgrower scheme or independent suppliers

122. The company has a Due Diligence System (DDS)?
No source

123. Suspension or exclusion criteria for suppliers?
This indicator is disabled as the company has informed ZSL that it has no suppliers including outgrower scheme or independent suppliers
### 124. Percentage of suppliers assessed and/or engaged on compliance with company requirements?
This indicator is disabled as the company has informed ZSL that it has no suppliers including outgrower scheme or independent suppliers.

### 125. Commitment to ethical conduct and prohibition of corruption?
The company has a commitment on the prohibition of corruption, but not on ethical/fair conduct.

### 126. Company has provided valid legal documents to Open Timber Portal on legal registration (at the time of SPOTT assessments)?
This indicator is disabled as the company's reporting broadly suggests that it doesn't operate in a geography currently covered by Open Timber Portal. Please note that ZSL has been unable to confirm this.

### 127. Disclosure of the company's management approach to tax and payments to governments?

### 128. Company has provided valid legal documents to Open Timber Portal on taxes, fees and royalties (at the time of SPOTT assessments)?
This indicator is disabled as the company's reporting broadly suggests that it doesn't operate in a geography currently covered by Open Timber Portal. Please note that ZSL has been unable to confirm this.

### 129. Whistleblowing procedure?

### 130. Own grievance or complaints system open to all stakeholders?
FSC Principles and Criteria (FSC-POL-01-004 V2-0 EN) require that appropriate methods are employed for resolving grievances. However, this commitment does not appear to extend beyond the Forest Management Unit. Half points have therefore been awarded for this indicator on the basis of the company's FSC certified landbank, which stands at 568,543 ha (100% of total operational area).

### 131. Details of grievances disclosed?

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