Particulars

About Your Or	ganisation
1.1 Member Na	nme
PHARMA-TRA	DE A/S
1.2 Membershi	p Number
4-0972-17-000-	00
1.3 Membershi	p Sector
Consumer Good	s Manufacturers
1.4 Membershi	p Category
Ordinary	
1.5 Country	
Denmark	
2.0 Does your c derivatives of p	ompany or organisation produce, process, consume or sell any palm oil or any products containing alm oil?
Yes	
Multiple selecti	t all description(s) that describe the palm oil-related activities of your company or organisation. ons are allowed, and not limited to the primary sector of the member's RSPO membership. You I to complete the relevant ACOP section based on your selection(s).
	rate oil palm estate(s) and/or palm oil mill(s)
	alm oil Independent Smallholder farmer Group
	rate independent palm oil mills
_	rate independent palm kernel crushing plants - Processors and/or Traders
	er palm oil, palm kernel oil or related products - Processors and/or Traders
	of palm oil or palm kernel oil - Processors and/or Traders
	or of intermediate (B2B) palm oil, palm kernel oil or related fractions/derivatives - Processors and/or Traders
	stributor or wholesaler of palm oil, palm kernel oil or related products - Processors and/or Traders
I manufacture 3rd party contr	final consumer (B2C) products containing palm oil, palm kernel oil or related products. This includes products manufactured by actors - Consumer Goods Manufacturers
I retail final co	
	onsumer (B2C) products containing palm oil, palm kernel oil or related products - Retailers
☐ I operate food	
_	onsumer (B2C) products containing palm oil, palm kernel oil or related products - Retailers

Particulars Page 1/1

Consumer Goods Manufacturers

	1. O	perational	l Profil	e
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1.1 Please state your company's main activity within the palm oil supply chain.
Food Good Manufacturer - own brand
Food Good Manufacturer - third-party brand
Home & Personal Care Good Manufacturer - own brand
✓ Home & Personal Care Good Manufacturer - third-party brand
Ingredient Manufacturers
Biofuels
Other
Other
-

2. Palm Oil and Certified Sustainable Palm Oil Consumption

Information in Section 2.0 - Palm Oil and Certified Sustainable Palm Oil Consumption - is a mandatory declaration in your ACOP. This includes volume data on palm oil, palm kernel oil and related products consumed, to enable the RSPO to accurately calculate uptake of individual members, sectors and RSPO members as a whole. ACOP reports without reported volume data will be considered as incomplete and will not be accepted. Incomplete ACOP reports may lead to suspension or termination of RSPO membership.

2.1 Please list down all operations and subsidiaries using palm oil, palm kernel oil and related products that are owned and/or managed by the member, including those under Group Membership

Persano Group A/S, Skaaremosevej 11-14, 3220 Græsted, Denmark
2.1.1 In which markets does your company sell goods with palm oil and oil palm products?
Europe
DL.2.0 In order to facilitate ease of reporting and transparency, RSPO members operating within the palm oil demand supply chain can now choose to report palm oil and palm oil product volumes on:
an aggregate level (as in previous ACOP reporting cycles)

2.2 Total volume of RSPO-certified (IP, MB, SG and RSPO Credits/Book and Claim) and Non RSPO-certified palm oil, palm kernel oil and related products purchased for use in your company's own-brand and third-party brand products

Description	Tonnes
Total volume of crude palm oil (tonnes)	0.00
Total volume of crude palm kernel oil (tonnes)	0.00
Total volume of palm kernel expeller (tonnes)	0.00
Total volume of crude palm oil/palm kernel oil-based derivatives and fractions (tonnes)	448.20
Total	448.20

2.2.1 Please estimate the percentage of derivatives and fractions (reported in Question CG.2.2) derived from palm oil or from palm kernel oil. The default split for volumes is assumed to be 80% palm oil-based derivatives and 20% palm kernel oil-based derivatives.

Description	Percentage
Palm oil-based derivatives and fractions	61
Palm kernel oil-based derivatives and fractions	39

2.3 Please estimate the regional distribution of your company's uncertified and certified palm oil, palm kernel oil and related products sales (as declared in Question 2.2) in the following countries/regions.

Countries/Regions	Percentage
Europe	100
North America	0
Malaysia	0
Indonesia	0
China	0
India	0
Latin America	0
Africa	0
Rest of World	0

2.4 Volume of RSPO-certified palm oil, palm kernel oil and related products purchased for use in your company's own-brand and third-party brand products in the year:

Description	Crude/Refined Palm Oil (CSPO)	Palm Kernel	Palm Kernel Expeller (CSPKE)	Certified Derivatives and Fractions
RSPO Credits from Mill / Crusher	0.00	0.00	0.00	0.00
RSPO Credits from Independent Smallholder	0.00	0.00	0.00	0.00
Mass Balance (MB)	0.00	0.00	0.00	397.00
Segregated (SG)	0.00	0.00	0.00	0.00
Identity Preserved (IP)	0.00	0.00	0.00	0.00
Total	0.00	0.00	0.00	397.00

2.4.1 Please estimate the percentage of RSPO-certified derivatives and fractions (reported in Question CG.2.4) derived from RSPO-certified palm oil or from RSPO-certified palm kernel oil. The default split for volumes is assumed to be 80% palm oil-based derivatives and 20% palm kernel oil-based

Description	Percentage
Certified Palm oil-based derivatives and fractions	63
Certified Palm kernel oil-based derivatives and fractions	37

2.5 According to the volume information you have provided in Question 2.2 and Question 2.4, your company's certified palm oil and palm oil products uptake is:

88.58%

2.5.1 Please provide additional information on your certified palm oil, palm kernel oil and related products uptake. This may include your usage of RSPO Credits to cover gaps in certified uptake, changes due to business environment, variations due to stock positions or efforts to support independent smallholders beyond volume commitments.

As a private label producer, we do not plan ourselves which products to produce -it is entirely due to demand. Also, ingredient selection is not entirely up to us - we also need to take numerous factors into account before selecting ingredients.

 $2.6\ Please\ estimate\ the\ regional\ sales\ volume\ distribution\ of\ your\ company's\ RSPO\ certified\ palm\ oil,\ palm\ kernel\ oil\ and\ related\ products\ (as\ declared\ in\ Question\ 2.4)\ in\ the\ following\ countries/regions:$

Percentage
100
0
0
0
0
0
0
0
0

3. TimeBound Plan

3.1 Which year did your company achieve (or expects to achieve) the RSPO supply chain certification?
2017
3.6 Does your company use RSPO-certified sustainable palm oil and palm oil products in products manufactured on behalf of other companies?
Yes
3.6.1 Does your company have a TimeBound Plan to only use RSPO-certified sustainable palm oil and palm oil products in the goods you manufacture on behalf of other companies?
Yes
3.6.2 When do you expect all products manufactured on behalf of other companies to only contain RSPO-certified sustainable palm oil and palm oil products?
2030

5. Actions for Next Reporting Period

5.1 Please outline activities that your company will take in the coming year to promote the production or consumption of certified sustainable palm oil (CSPO)
Participation in RSPO Working Group or Task Forces
Support Independent Smallholders (ISH)
Contribute to the RSPO Smallholder Trainer Academy
Financial contribution to the RSPO Smallholder Support Fund
Direct investments in Smallholder Certification projects
Involvement/direct investments in Jurisdictional/Landscape approach
Direct/collective investments in conservation and restoration initiatives
Financial contribution to support members with Remediation and Compensation (RaCP) process, direct/collective investments in conservation and restoration initiatives
Allocating FTE to promote the production or consumption of certified sustainable oil palm products
Specific policies and action plans by the member to promote CSPO production or consumption in the upstream or downstream supply chain, including target dates or broader policies that include such efforts
No activities planned
✓ Others
Other
We are participating in the Danish Alliance for sustainable palm oil - a group across sectors in Denmark.
Working on: Rise awareness in consumers in regards to palm oil and sustainability. In Denmark, the concious consumers still think palm-free is the most sustainable.
How to support small holders is another hot topic, especially with the EUDR coming up.

Shared Responsibility

The Board of Governors of the Roundtable on Sustainable Palm Oil approved new Shared Responsibility rules on 31 October 2019, requiring all members to share sustainability requirements and obligations. Reporting of Shared Responsibility (SR) requirements will be done through ACOP and MyRSPO. As the process of verification of the reports is in development, the Shared Responsibility section in ACOP may change in future ACOP cycles. Evidence to show compliance to the SR requirements shall be uploaded via your membership profile in MyRSPO. Please login to your MyRSPO account and upload the relevant policies, plans and relevant reports there. If you do not have a policy or your policy does not cover all items, you will be required to provide a Declaration of Support for the relevant policy items in your MyRSPO profile. Additional information on the required policies and plans applicable to all sectors as well as the annual uptake targets for supply chain actors can be found on https://rspo.org/members/shared-responsibility or email the Shared Responsibility team at sharedresponsibility@rspo.org.

sharedresponsibility@rspo.org.
SR 1. Transparency
1.1 Does your organisation have organisational management documents publicly-available?
No
SR 2. Ethical Conduct
1.2 Does your organisation have a publicly-available policy covering Ethical Conduct, including for recruitment and contractors?
Yes
SR 3 and SR 4. Legal Compliance
1.3 Does your organisation comply with all applicable legal requirements?
Yes
1.4 Does your organisation require its third party contractors to comply with legal requirements?
Yes
SR 7. Claims and labels
1.7a Does your organisation promote the use of off-product RSPO claims and labels?
Yes
SR 8. Information and outreach activities
1.8 Does you organisation implement transparent communication and outreach activities to promote sustainable palm oil?
Yes
SR 9. Human Rights
1.9 Does your organisation have a publicly-available Policy on respect for human rights, including for suppliers and sub-contractors?
Yes

Shared Responsibility Page 1/4

✓ No forced or trafficked labour

SR 10. Complaints & Grievances
1.10 Does your organisation have a Grievance Mechanism that is accessible to all affected parties?
Yes
1.10.1 Is your Grievance mechanism in line with the principles of the RSPO's Complaints System?
Yes
SR 11 and SR 12. Land Use and FPIC
1.11a Does your organisation have a policy covering Commitment to respect Free Prior and Informed Consent (FPIC) in the operational Palm Oil Supply chain?
No
SR 13 and SR 14. Smallholders inclusion
1.13 Does your organisation support oil palm smallholders (groups)?
No
SR 15 - SR 20. Labour & Labour Rights
1.15 Does your organisation have a publicly-available policy covering Labour & Labour Rights?
Yes
1.15.1 Does the policy cover:
✓ No discrimination and equal opportunities
✓ Pay and conditions of the workers.
✓ Freedom of association and Collective bargaining
✓ Protection of children and remediation for suppliers and third party contractors.
Prevention of all forms of harassment, including sexual harassment

Shared Responsibility Page 2/4

SR 21. Occupational Health & Safety

1.21 Does your organisation have a publicly-available Policy covering Occupational Health & Safety?
Yes
SR 22. Waste Management
1.22a Does your organisation have a waste management plan that includes reduction, recycling, reusing and disposal based on the hazardous characteristics?
Yes
1.22a.1 Is this plan implemented?
Yes
SR 23. Water Management
1.23 Does your organisation have a water management plan to promote efficient use and continued availability of water sources?
Yes
1.23.1 Is this plan implemented?
Yes
SR 24. Energy Use
1.24 Does your organisation have an energy use plan to improve the efficiency of the fossil fuels used and to optimise renewable energy?
Yes
1.24.1 Are there records of implementation of the plan ie. monitoring and reporting?
Yes
SR 25. Cllimate Change and Greenhouse Gases (GHG)
1.25 Does your organisation have a publicly-available policy covering Climate Change & Greenhouse Gas (GHG) including identification and assessment of GHG emissions and implementation of a plan to reduce or minimise them?
No

Shared Responsibility Page 3/4

No

SR 26. Promotion of certification/uptake

No 1.26b.1 Why not? ✓ Lack of knowledge on the SR uptake target and /or how to calculate it Lack of suppliers. Lack of demand from my clients ✓ Other Others If I calculate correctly, we reach our uptake volume for CSPKO, but not CSPO. In order to reach the CSPO target volume, we would need to buy more material based on PO - not only to increase the percentage, since our target volume is 105,8%. We have reached a level, where it is difficult since we only buy derivates. SR 27. Sustainable Palm Oil Policy 1.27a Does your organisation have other relevant policies as a sustainable palm oil sourcing policy? Yes SR 28 and SR 29. Support and resourcing

1.28 Does your organisation provides services and support to RSPO and resources to implement SR?

Shared Responsibility Page 4/4

Challenges and Support

1.1 What significant obstacles or challenges has your company encountered in the promotion of certified sustainable palm oil (CSPO)? What efforts has your company taken to address these obstacles or challenges?
Awareness of RSPO in the market
Difficulties in the certification process
Certification of smallholders
Competition with non-RSPO members
High costs in achieving or adhering to certification
Human rights issues
✓ Insufficient demand for RSPO-certified palm oil
Low usage of palm oil
Reputation of palm oil in the market
Reputation of RSPO in the market
☐ Supply issues
Traceability issues
No challenges faced
✓ Others
Others
Consumers are not really aware nor demanding products with trademark on. We sell very few products as certified compared to the volumes bought - but for us the importance of buyuing is bigger than selling.
But the price difference is getting more and more of an issue with the purchasing department asking if it really is necessary eg. Glycerin will be an issue with EUDR where it is easier and cheaper to buy Glycerin based on other oil crops.
EUDR is also going to be of interest to see - as a smaller company, we are really hoping for RSPO to come up with a solution.
1.2 In addition to the actions already reported in this ACOP report, what other ways has your company supported the vision of the RSPO to transform markets to make sustainable palm oil the norm?
1.2 In addition to the actions already reported in this ACOP report, what other ways has your company supported the vision of the RSPO to transform markets to make sustainable palm oil the norm? ✓ Communication and/or engagement to transform the negative perception of palm oil
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Challenges & Support Page 1/2

Talked about EUDR and certification at a meeting arranged for the cosmetic industry in Denmark by trade organisations

homepage (not space enough left for the Trademark logo on the physical product).

and the authorities.

1.3 If your company has any other publicly-available reports or information regarding its palm oil-related policies and activities, please provide the links here

 $https://persano.dk/files/Handlingsplan_for_ansvarlig_palmeolie_maj_2023.pdf$

It is in Danish

Challenges & Support Page 2/2