Particulars

About Your Organisation

1.1 Name of your organisation
Bella Bulgaria S.A.
1.2 What is/are the primary activity(ies) or product(s) of your organisation?
Palm Oil Grower
Processor and/or Trader
Consumer Goods Manufacturer
Retailer
Bank and/or Investor
Social and/or Development NGO
Environmental and/or Conservation NGO
Affiliate
1.3 Membership number
4-1221-19-000-00
1.4 Membership category
Consumer Goods Manufacturers
1.5 Membership sector
Ordinary

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Consumer Goods Manufacturers

1. Operational Profile

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 - Palm Oil and Certified Sustainable Palm Oil Consumption - is a manda ACOP. This includes volume data on palm oil and palm oil products consumed, to enable the RSP calculate uptake on a member, sector and total level. ACOP reports without reported volume data incomplete and will not be accepted.	O to accurately
2.1 Please list down all operations and subsidiaries using palm oil that are owned and/or managincluding those under Group Membership	ged by the member,
Storing of raw materials - palm oil products, mixing of emulsions (water/oil emulsion), packaging and stor margarine with different fat content either in final consumer packagings (200 g, 250 g, 500 g, 2 kg) or proindustrial use (blocks of margarine 10, 15, 18 kg). Re-packaging of palm oil/fat as frying fat into consume industrial use.	oducts for further
2.1.1 In which markets does your company sell goods with palm oil and oil palm products?	
Bulgaria ,Germany ,Greece ,Romania ,Spain ,United Kingdom	
2.2.5 Total volume of all palm oil and palm oil products (palm-content only) used in your comparproducts and in products produced by your company for third-party brands in the year:	any's own-brand
Description	Tonnes
Total volume of crude/refined palm oil (tonnes)	1188.203
Total volume of crude/refined palm kernel oil (tonnes)	0.0
Total volume of palm kernel expeller (tonnes)	0.0
Total volume of palm oil/palm kernel oil derivatives and fractions (tonnes)	266.0
Total	1454.203

2.2.6 Please estimate the percentage of derivatives and fractions (reported in Question CG.2.2.4) 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	80.0
Palm kernel oil-based derivatives and fractions	20.0

2.3 Volume of RSPO-certified palm oil and palm oil products used in your company's own brand products and in products produced by your company for third-party brands in the year (tonnes):

Description	Crude/Refined Palm Oil (CSPO)	Crude/Refined Palm Kernel Oil (CSPKO)	Palm Kernel Expeller (CSPKE)	Certified Derivatives and Fractions
RSPO Credits from Mill / Crusher	0.0	0.0	0.0	0.0
RSPO Credits from Independent Smallholder	0.0	0.0	0.0	0.0
Mass Balance (MB)	0.0	0.0	0.0	0.0
Segregated (SG)	95.0	0.0	0.0	0.0
Identity Preserved (IP)	0.0	0.0	0.0	0.0
Total	95.0	0.0	0.0	0.0

2.3.1 Please estimate the percentage of RSPO-certified derivatives and fractions (reported in Question CG.2.3) 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 derivatives.

Description	Percentage
Certified Palm oil-based derivatives and fractions	80.0
Certified Palm kernel oil-based derivatives and fractions	20.0

2.4 According to the volume information you have provided in Question 2.2 and Question 2.3, your company's certified palm oil and palm oil products uptake is:

6.53%

2.4.1 If your company has not reached 100% usage of sustainable palm oil through the four supply chain models (RSPO Credits, MB, SG or IP), do you have any plans to cover the gap using RSPO Credits?

No

2.4.2 Please explain why you do not intend to cover the gap using RSPO Credits

Future plans are all used palm oil products to be RSPO certified.

 $2.5\ Please\ estimate\ the\ regional\ distribution\ of\ your\ company's\ RSPO\ certified\ palm\ oil\ and\ palm\ oil-products\ us\ age\ (as\ declared\ in\ Question\ CG.2.3)\ in\ the\ following\ countries/regions:$

Countries/Regions	Percentage
Europe	100.0
North America	0.0
Malaysia	0.0
Indonesia	0.0
China	0.0
India	0.0
Latin America	0.0
Africa	0.0
Rest of World	0.0

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3.1 Which year did your company achieve (or expects to achieve) the RSPO supply chain certification?
2020
3.2 Which year did your company begin (or expects to begin) using RSPO-certified sustainable palm oil and palm oil products in own-brand products
2019
3.2.1 If the previous target year for CG.3.2 has not been met, please explain why.
The first productions with RSPO-certified sustainable palm oil products have successfully begun in 2019.
3.3 Which year did your company begin (or expects to begin) using 100% RSPO-certified sustainable palm oil and palm oil products from any supply chain option in own-brand products.
2025
3.3.1 If the previous target year for CG.3.3 has not been met, please explain why.
The set target is 2025. Still in process.
3.4 Which year did your company begin (or expects to begin) using 100% RSPO-certified sustainable palm oil and palm oil products from physical supply chain options (Identity Preserved, Segregated and/or Mass Balance) in ownbrand products.
2025
3.4.1 If the previous target year for CG.3.4 has not been met, please explain why.
The set target is 2025. Still in process.
3.5 If the TimeBound Plan commitments declared above do not cover all countries in which the member operates, please explain why
The TimeBound Plan commitments declared above do cover all countries in which our company operates.
$3.6\ Does\ your\ company\ use\ RSPO-certified sustainable palm\ oil\ and\ palm\ oil\ products\ in\ products\ manufactured\ on\ behalf\ of\ other\ companies?$
No
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?
2025.0

4. Trademark Use

4.1 Does your company use or plan to use the RSPO Trademark in own-brand products?
No
4.3 Please explain why your company does not plan to use the RSPO Trademark in own-brand products
✓ Challenging reputation of palm oil
Confusion among end-consumers
Costs of changing labels
Difficulty of applying for RSPO Trademark
Lack of customer demand
Limited label space
Low consumer awareness
Low usage of palm oil
Risk of supply disruption
Others
Others

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)

As a first step in 2020 our company will undergo a third party certification audit in order to get RSPO certified. If a RSPO certificate is awarded, our company will communicate its commitment to the RSPO principle to its main customers.

6. Shared Responsibility

The Board of Governors of the Roundtable on Sustainable Palm Oil (RSPO) approved new Shared Responsibility rules on 31 October 2019, requiring all members to share sustainability requirements and obligations. Reporting of Shared Responsibility indicators will be done through several channels, including ACOP. As the implementation of Shared Responsibility reporting is still on-going and in development, the Shared Responsibility section in ACOP is not yet final and may change in future ACOP cycles. For more information on Shared Responsibility, please go to https://rspo.org/news-and-events/news/what-are-the-new-shared-responsibility-rules or email the ACOP team at acop@rspo.org

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Labour & Labour Rights
6.1 Does your company have a publicly-available policy covering Labour & Labour Rights?
No
Ethical Conduct & Human Rights
6.2 Does your company have a publicly-available Policy covering Ethical Conduct & Human Rights?
No
Land Use
6.3 Does your company have a publicly-available Policy covering Land Use?
No
Occupational Health & Safety
6.4 Does your company have a publicly-available Policy covering Occupational Health & Safety?
No
Climate Change & Greenhouse Gas (GHG)
6.5 Does your company have a publicly-available policy covering Climate Change & Greenhouse Gas (GHG)?
No
Complaints & Grievances
6.6 Does your company have a Complaints & Grievances Mechanism?
Yes
6.6.1 Is your Complaints & Grievances mechanism in line with the RSPO's grievance mechanism? For details of the RSPO's grievance mechanism, please go to https://askrspo.force.com/Complaint/s/
Yes
Smallholders
6.7 Does your company support oil palm independent smallholder groups?
No
6.7.3 Do you have any future plans to support oil palm Independent Smallholders?
No
6.7.4 Please explain why you are not planning to support oil palm independent smallholders
The whole concept of RSPO and all associated mechanisms to support the different groups in the palm oil supply chain are still relatively new to our company. At this stage we are not well aware what our capabilities of supporting oil palm independent smallholders are.

7. Challenges

7.1 pal	What significant obstacles or challenges has your company encountered in the promotion of certified sustainable moil (CSPO)? What efforts has your company taken to address these obstacles or challenges?
Y	Awareness of RSPO in the market
	Difficulties in the certification process
	Certification of smallholders
\checkmark	Competition with non-RSPO members
	High costs in achieving or adhering to certification
	Human rights issues
\mathbf{Y}	Insufficient demand for RSPO-certified palm oil
	Lowusage of palm oil
\mathbf{Y}	
	Reputation of RSPO in the market
\mathbf{Y}	Supply issues
	Traceability issues
	No challenges faced
	Others
Oth	ners
7.2 vis	In addition to the actions already reported in this ACOP report, what other ways has your company supported the ion of the RSPO to transform markets to make sustainable palm oil the norm? Engagement with business partners or consumers on the use of CSPO
H	Engagement with government agencies
H	Promotion of CSPO outside of RSPO venues such as trade workshops or industry associations
П	Promotion of physical CSPO
百	Providing funding or support for CSPO development efforts
$\overline{\Box}$	Research & Development support
$\overline{\Box}$	Stakeholder engagement
П	No actions taken
	Others
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act	If your company has any other publicly-available reports or information regarding its palm oil-related policies and ivities, please provide the links here other publicly-available reports or information regarding our palm oil-related policies and activities.
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