

***Roundtable on Sustainable Palm Oil Certification
RSPO***

[] Stage-1 [] Stage-2 [✓] Surveillance [] Re-Certification

Name of Management Organisation : **Agronusa Investama POM – PT Agronusa Investama, Wilmar International, Ltd**

Plantation Name : **Agronusa Investama Estate, Sentama Lestari Smallholder and Cempaka Biru Smallholder**

Location : **Semanga Village, Sejangkung Sub-District, Sambas District, Kalimantan Barat Province, Indonesia**

Certificate Code : **MUTU-RSPO/024**

Date of Certificate Issue : 22 April 2013 Date of License Issue : 22 April 2017

Date of Certificate Expiry : 21 April 2018 Date of License Expiry : 21 April 2018

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-4	20 – 23 February 2017	Oktovianus Rusmin, M. Rinaldi, Sofyan Hadi Lubis, Asystasya Aishah Silalahi	Octo HPN Nainggolan	Tony Arifiarachman

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-4	30 April 2017

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Figure 1. Location Map of PT. Agronusa Investama

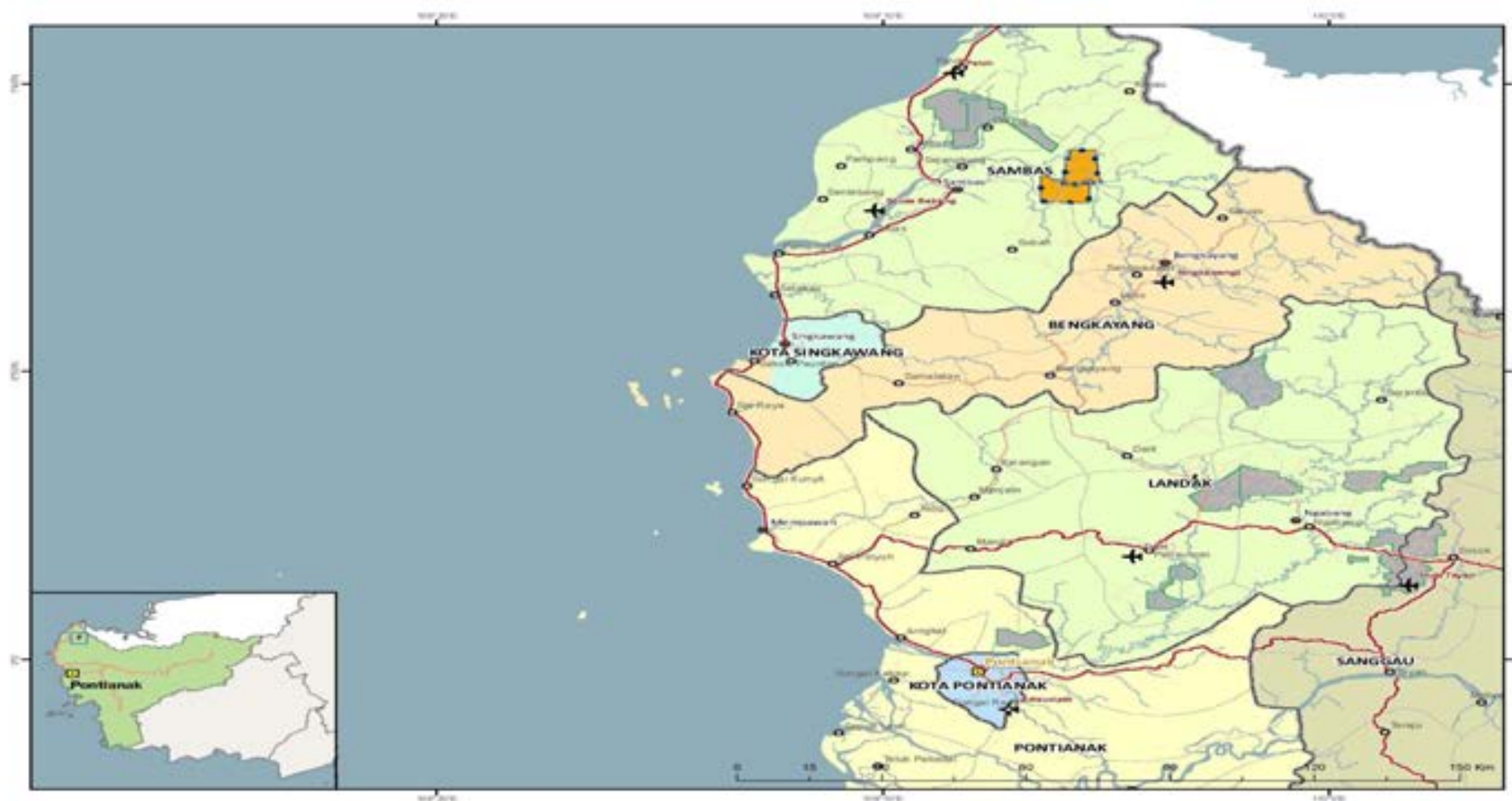
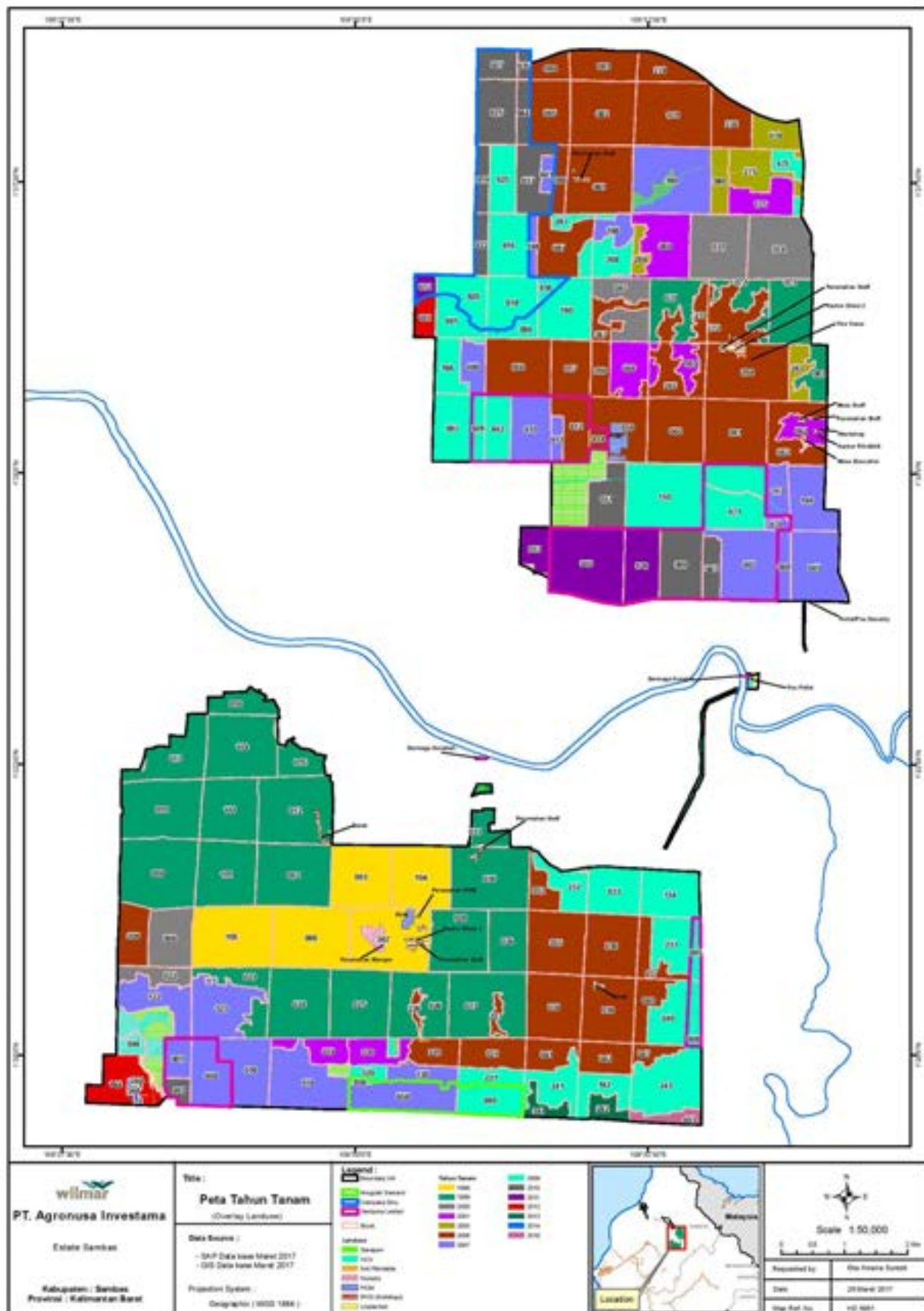


Figure 2. Operational Map of PT. Agronusa Investama



Glossary

ANI	:	Agronusa Investama
BLH	:	<i>Badan lingkungan hidup</i> (environment agency)
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i> (Social Security Agency)
CPO	:	Crude Palm Oil
EFB	:	Empty Fruit Bunch
FFB	:	Fresh Fruit Bunch
FGD	:	Focus Group Discussion
HRGA	:	Human Resources and General Affair
HCV	:	High conservation value
IPM	:	Integrated Pest Management
LB3	:	<i>Limbah berbahaya dan beracun</i> (hazardous waste)
LCC	:	Legume cover crop
MSDS	:	Material Safety Data Sheet
NGO	:	Non Government Organization
OHS	:	Occupational Health and Safety
P2K3	:	<i>Panitia Pembina Keselamatan dan Kesehatan Kerja</i> (OHS Committee)
POM	:	Palm Oil Mill
PP	:	<i>Peraturan pemerintah</i> (Government regulation)
PPE	:	Personal Protective Equipment
SDC	:	System Development Control
SIA	:	Social impact assessment
SOP	:	Standar Operational Procedure
TPS LB3	:	<i>Tempat penyiimpann semeentara LB3</i> (Hazardous Waste Storage)
WHO	:	World Health Organization
WTP	:	Water Treatment Plant
WWTP	:	Waste water treatment pond

1.0 SCOPE OF THE CERTIFICATION ASSESSMENT			
1.1 Assessment Standard Used			
	<ul style="list-style-type: none"> <i>Indonesian National Interpretation of RSPO Principles and Criteria 2013 by INA-NITF, July 2016 (Endorsed by the RSPO Board of Governors meeting on 30th September 2016)</i> <i>RSPO Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014 (Module D / E for CPO Mill)</i> 		
1.2 Organisation Information			
1.2.1	Organisation name listed in the certificate	PT Agronusa Investama – Wilmar International, Ltd	
1.2.2	Contact person	SIMON SIBURAT	
1.2.3	Organisation address and site address	Head Office: 56 Neil Road, Singapore 088830 Site: Semanga Village, Sejangkung Sub-District, Sambas District, Kalimantan Barat Province, Indonesia.	
1.2.4	Telephone	(65) 6216-0244	
1.2.5	Fax	(65) 6836-1709	
1.2.6	E-mail	simonsiburat@wilmar.com.my	
1.2.7	Web page address	web: www.wilmar-international.com	
1.2.8	Management Representative who completed the application for certification	Simon Siburat (Sustainability Controller Wilmar Group)	
1.2.9	Registered as RSPO member	2-0017-05-000-00 16 Agustus 2005	
1.3 Type of Assessment			
1.3.1	Scope of Assessment and Number of Management Unit	Palm Oil Mill and supply base ANI Sambas POM, ANI Sambas Estate, Semtama Lestari dan Cempaka Biru Smallholder	
1.3.2	Type of certificate	Single	
1.4 Locations of Mill and Plantation			
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			Latitude Longitude
	ANI POM	Semanga Village, Sejangkung Sub-District, Sambas District, Kalimantan Barat Province, Indonesia	1° 21' 13.397" N 109° 30' 28.634" E
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			Latitude Longitude
	ANI-Sambas Estate	Semanga Village, Sejangkung Sub-District, Sambas District, Kalimantan Barat Province, Indonesia	1° 25' 20.143" N 109° 33' 57.902" E
	Semtama Lestari Smallholder	Semakuan Village, Semanga Village, Sejangkung Sub-District, Sambas	1° 25' 40.980" N 109° 31' 0.112" E

		District, Kalimantan Barat Province, Indonesia			
	Cempaka Biru Smallholder	Sajingan Kecil Village, Semanga Village, Sejangkung Sub-District, Sambas District, Kalimantan Barat Province, Indonesia	1° 28' 38.3" N	109° 31' 29.7" E	
1.5 Description of Area Statement					
1.5.1	Tenure				
	• State		14,000 * Ha		
	• Community		- Ha		
	*based on Plantation Business Permit (IUP) based Sambas Regency Decree No. 372 of 2008				
1.5.2	Area Statement				
		ANI Estate	Sentama Lestari	Cempaka Biru	Total Area
	• Total area	7,910.93 Ha	858.77 Ha	472.00 Ha	9,241.70 Ha
	• Mature area	7,087.05 Ha	837.12 Ha	456.54 Ha	8,380.71 Ha
	• Immature area	22.97 Ha	-	-	22.97 Ha
	• Mill	17.86 Ha	-	-	17.86 Ha
	• Road, Housing, Drainage	247.65 Ha	21.65 Ha	15.46 Ha	284.76 Ha
	• Nursery	10.00 Ha	-	-	10.00 Ha
	• Occupation	127.87 Ha	-	-	127.87 Ha
	• Not Plantable Area	347.48 Ha	-	-	347.48 Ha
	• HCV	50.05 Ha	-	-	50.05 Ha
	* Based on Decree of the Head of the Forest Area Consolidation (BPKH) Region III No. S.160 / VII / BPKH-II / 2009, dated April 24, 2009				
1.6 Planting Year and Cycles					
1.6.1	Age profile of planting year				
	Planting Year	Hectarage (Ha)			
		ANI Estate	Sentama Lestari	Cempaka Biru	
	1998	518.00			
	1999	1,855.60			
	2000	344.78			
	2001	288.00			
	2005	154.10			
	2006	2,064.77	56.75		
	2007	725.25	273.23	12.30	
	2009	932.83	199.09	217.28	
	2010	53.03	116.28	214.93	
	2011	30.59	191.77	12.03	
	2012	79.13			
	2013	40.97			

	2014	4.01			
	2016	18.96			
	TOTAL	7,110.02		837.12	456.54
1.6.2	New Planting area after January 2010				
1.6.3	Planting Cycle		1 st Cycle		
1.7 Description of Mill and Supply Base					
1.7.1	Description of Mill				
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO	Palm Kernel
				Out put (ton)	Extraction (%)
				Out put (ton)	Extraction (%)
	ANI POM	30	130,455.73	23,756.67	18.21
				5,333.44	4.09
<i>*Production data source from February 2016 – January 2017</i>					
1.7.2	Description of Certification Scope of Supply Base				
	Name of Estate	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)
				Supplied to Mill	
				FFB (tonnes/year)	%
	ANI Sambas	7,910.93	7,110.02	143,457.40	20.09
	Sentama Lestari Cooperative (999 Smallholders)	858.77	837.12	7,761.94	9.27
	Cempaka Biru Cooperative (226 smallholders)	472.00	456.54	4,170.01	9.38
	TOTAL	9,241.70	8,403.68	155,389.35	18.45
				123,505.65	79.48
<i>*Production data source from February 2016 – January 2017</i>					
1.7.3	FFB description from other source				
	Name of sources	Organisation	Location	Supplied to Mill	
				FFB (tonnes/year)	
	Beringin Cooperative	Independent Outgrower (RSPO Non- Certified)	Sambas District, Kalimantan Barat Province, Indonesia	1,207.78	
	Kaharudin			570.77	
	Ketut B			79.97	
	Latif M A			1,571.60	
	PT. Kapuas Jaya Abadi			1,001.73	
	Rahmat H			200.09	
	Sabung Cooperative			1,764.44	
	Sepantai Cooperative			517.06	
	TOTAL			6,913.44	
<i>*Production data source from February 2016 – January 2017</i>					
1.7.4	Product categories			FFB, CPO, PK	
1.8 Estimate Tonnage of Certified Product					
1.8.1	Past Annual Claim Certified Product		Previous Certificate Claim 22 April 2016 to 21 April 2017 (tonnes/year)		Actual certified product 22 April 2016 to 20 February 2017

					(tonnes/year)		
	• FFB Production			141,200	114,053.79		
	• CPO Production			29,652	21,895		
	• Palm Kernel (PK) Production			7,060	5,005		
1.8.2	Estimate of Certified FFB Claim						
	Name of Estate(s)	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)		
	ANIS Estate	7,910.93	7,110.02	150,631	21.25		
	Sentama Lestari Cooperative	858.77	837.12	8,151	9.74		
	Cempaka Biru Cooperative	472.00	456.54	4,379	9.6		
	TOTAL	9,241.70	8,403.68	163,161	19.47		
	<i>*Projected FFB production for 12 months of certificate (22 April 2017 to 21 April 2018)</i>						
1.8.3	Estimate of Certified Palm Product Claim						
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO	Palm Kernel		
				Out put (ton)	Extraction (%)	Out put (ton)	Extraction (%)
	ANIS POM	30	163,161	32,632	20	6,526	4
	<i>*Projected FFB production for 12 months of certificate (22 April 2017 to 21 April 2018)</i>						
1.9	Other Certifications						
	ISO 9001:2008		-				
	ISO 14001: 2004		-				
	OHSAS 18001:2007		-				
	ISCC		-				
	Others		-				
1.10	Time Bound Plan						
1.10.1	Time Bound Plan for Other Management Units						
	Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status	
	MILL	Time Bound Plan					
	Sapi (1 + 2)	2008	Sapi 1 & 2, Kiabau	2008	Sandakan, Sabah, Malaysia	Certified	
	Sabahmas	2008	Sabahmas	2008	Lahad Datu, Sabah, Malaysia	Certified	
	Reka Halus	2008	Reka Halus	2008	Sandakan, Sabah, Malaysia	Certified	
	Saremas 1	2008	Saremas 1, Saremas 2 (Div D), Suai	2008	Miri Serawak, Malaysia	Certified	
	Saremas 2	2008	Saremas 2 (exclude Div D), Kaminsky, Segarmas	2008	Miri Serawak, Malaysia	Certified	

Terusan (1 + 2)	2009	Terusan 1 & 2, Rumidi	2009	Sandakan, Sabah, Malaysia	Certified
Ribubonus	2009	Ribubonus	2009	Sandakan, Sabah, Malaysia	Certified
PT Perkebunan Milano	2009	Sei Daun, Batang Saponggol, Marbau	2009	North Sumatra	Certified
PT Mustika Sembuluh 1	2009	Mustika Sembuluh 1, Mustika Sembuluh 2, Kerry Sawit Indonesia 2, Sarana Titian Permata 1, Sarana Titian Permata 2, Sarana Titian Permata 3	2009	Central Kalimantan	Certified
PT Mustika Sembuluh 2	2015	Mustika Sembuluh 3, Bumi Sawit Kencana 1	2015	Central Kalimantan	Certified
PT Kencana Sawit Indonesia	2010	Kencana Sawit Indonesia, Koperasi Swamata	2010	West Sumatra.	Certified
PT. Kerry Sawit Indonesia 1	2010	Kerry Sawit Indonesia 2, Kerry Sawit Indonesia 3	2010	Central Kalimantan	Certified
PT. Kerry Sawit Indonesia 2	2015	Kerry Sawit Indonesia 1, Kerry Sawit Indonesia 2, Mustika Sembuluh 2,	2015	Central Kalimantan	Certified
PT. Tania Selatan	2010	Burnai Barat, Burnai Timur	2010	South Sumatra	Certified
Sri Kamusan	2010	Hibumas 1, Hibumas 2, Sri Kamusan, Jebawang, Sekar Imej, Sapi Sugut	2010	Sandakan, Sabah	Certified
PT. AMP Plantation	2011	AMP I, AMP II, AMP III, AMP, Primatama Mulia Jaya, Karya Agung Megah Utama, Perkebunan Anak Negeri, Koperasi Tompek Tapian Kandis	2011	West Sumatra	Certified
PT. ANI (Sambas)	2012	ANI Estate	2012	West Kalimantan	Certified
PT. Buluh Cawang Plantation	2012	Bumi Arjo, Dabuk Rejo, Sukamulya, Bambu Kuning	2012	South Sumatra	Certified
PT. Bumi Sawit Kencana	2012	Bumi Sawit Kencana 1, Bumi Sawit Kencana 2, Karunia Kencana Permaisejati 1	2012	Central Kalimantan	Certified
PT. Sarana Titian Permata	2012	Sarana Titian Permata 1, Sarana Titian Permata 2, Sarana Titian Permata 3	2012	Central Kalimantan	Certified

PT. Sarana Titian Permata 2	2018	Sarana Titian Permata 1, Sarana Titian Permata 2	2018	Central Kalimantan	-
PT. Gersindo Minang Plantation	- 2013	Gersindo Minang Plantation, Permata Hijau Plantation-1, Permata Hijau Plantation-2	2013	West Sumatra	Certified
PT. Daya Labuhan Indah	- 2013	Wonosari, Sei Deras, Cabang Dua	2013	North Sumatra	Certified
PT. Milano (Cabang Dua Estate)	2013	(Supply base DLI-2)	2013	North Sumatra	Certified
PT. Agro Palindo Sakti	2014	PT Agro Palindo Sakti Estate	2014	South Sumatra	Certified
PT. Mentaya Sawit Mas	2014	Mentaya Sawit Mas 1, Mentaya Sawit Mas 2, Bumi Sawit Kencana 2	2014	Central Kalimantan	Certified
PT. Sinarsiak Dianpermai	2018	PT Sinarsiak Dianpermai Estate	2018	Riau	Stage 1
BBPOP (Benso Plantation)	2015	Benso, Benso Smallholder	2015	Ghana	Certified
PT. Murini Sam Sam	2015	Murini Sam Sam Estate	2015	Riau	Certified
PT Bumi Pratama Khatulistiwa	2016	Bumi Pratama Khatulistiwa Estate Buluh Cawang Estate	2016	West Kalimantan	Final Audit
PT Karunia Kencana Permaisejati	2015	PT. Karunia Kencana Permaisejati 1, PT. Karunia Kencana Permaisejati 2, PT. Karunia Kencana Permaisejati 3	2015	Central Kalimantan	Final Audit
PT Rimba Harapan Sakti	2015	PT. Rimba Harapan Sakti 1, PT. Rimba Harapan Sakti 2, , Sarana Titian Permata 1, Sarana Titian Permata 2, Sarana Titian Permata 3	2015	Central Kalimantan	Certified
PT Agronusa Investama Pahauman	2018	PT ANI Pahauman estate PT Pratama Procentindo	2018	West Kalimantan	-
PT. Agro Palindo Sakti 2	2018	PT. Agro Palindo Sakti estate, PT. Indo resin Putra Mandiri, PT. Daya Landak Plantation, PT. Putra Indotropical	2018	West Kalimantan	-
PT. Agroindo Indah Perkasa	2017	PT Agroindo Indah Perkasa Estate	2017	Bangko – Jambi	-

	2				
	PT. Musi Banyuasin Indah	2018	PT MBI Sei Jarum estate PT MBI Sei Selabu estate	2018	South Sumatera
					-
1.10.2	Progress of Associated Smallholders and Out growers for Certifiable Standard				
	PT. Agronusa Investama has a scheme smallholders with name of Sentama Lestari Cooperatif and Sentama Lestari Cooperatif. During the ASA-4, the smallholders has been audited in accordance with the time bound plan.				

2.0 ASSESSMENT PROCESS	
2.1 Assessment Team	
ASA-4	<p>1. Oktovianus Rusmin (Lead Auditor) Bachelor's Degree in Social & Political Sciences Department of Anthropology. The working experience, consist of: Coastal Project-Department of Anthropology in Indonesian University (Pilot Project of Mangrove Rehabilitation in coastal area of South Sulawesi) as Social Supervisor (1999-2001), Center of Anhtropology Study - Indonesian University (Research and Publication) as Researcher (2002 – 2014), The Forest Trust-Indonesia (Consultant of Sustainable Forest Management) as Social Advisor (2004 – 2010) and eForest Consultant (HCV Identification and Social Impact Assessment) as staff (2010 – 2011). Already participated in several training, consist of: Forest Management Auditor (FSC Standard), Environmental Management System ISO 14001, ISO 9001:2008, Conflict Resolution, Human Right, Verification System of Wood Legality, Training Lead Auditor of ISPO & RSPO Scheme. Had participate in Sustainable Forest Certification (Eco Labelling Indonesia Standard), Gap Analysis of FSC Standard. He was numerously involved in audit of sustainable palm oil certification since 2011 for Indonesian Sustainable Palm Oil (ISPO) and RSPO Scheme in Indonesia & Malaysia as Auditor and <i>Lead Auditor</i>. The aspect of audited consist of : Social/Conflict Resolution, Land Use Legality, and Supply Chain Certification System (SCCS).</p> <p>2. Muhammad Rinaldi (Auditor). Indonesian citizen, Diploma of Oil Palm Plantation. He has 4 years working experience as Assistant Agronomy since 2007. He has attended training RSPO Lead Auditor, training of Auditor ISPO, training of Lead Auditor ISO 9001-2008, training of ISO 14000, training of HCV identification, training of OHS management system, training of potential and conflict resolution. Experienced in auditing in relevant scheme (ISPO) since 2014 with the aspects of land legality, environmental, social, occupational health and safety, Best Management Practices, Conservation and worker welfare. At this activity he assess aspect of Best Management Practices, OHS and Planning.</p> <p>3. Sofyan Hadi Lubis (Auditor) Master's Program in Environmental and Natural Resource Management and Bachelor of Social Economic Agriculture. Has been involved as a researcher at the Research Centre of Forestry and Climate Change and Cooperation IPB-ETH Zurich Swiss-NUS Singapore regarding carbon stock analysis. The training has been followed, among other climate change mitigation and adaptation for agricultural productivity in Southeast Asia, Asian Carbon Update and Network and Climate Change Mitigation and Adaptation for Agricultural Productivity, Environmental Impact Assessment (EIA), Lead Auditor ISPO (Indonesian Sustainable Palm Oil), IHT-RSPO, ISO 9001, HCV, ISO 14001, Calculation of Greenhouse Gases (GHG), ISCC Plantation Audit and Land Use Assessment, Green Industry and ISCC EU and Plus Basic Training. Furthermore, he also worked as a staff environmental consulting firm and currently working as an auditor in the certification body (PT Mutuagung Lestari). He has has conducted audits for ISPO scheme, RSPO and ISCC in oil palm plantations, Indonesia as an auditor. During this audit, he verified environment, conservation, and GHG aspect.</p> <p>4. Asystasya Aishah Silalahi (Auditor Trainee) Indonesia citizen, Bachelor of Economy, Major of Agribusiness, Faculty of Economic and Management. She has one year experience in consultancy. She has followed training such as ISPO Auditor Training, Lead Auditor ISO 9001:2015, OHS General Expert, and several in house training related to environmental, BMP, etc. Has been involved in several audit activities since 2016 related to sustainable palm oil certification covering waste management aspect, Social Aspect, Health and Safety Aspect, and Worker Welfare. During this audit, she verified social/worker rights and transparency aspects.</p>
2.2 Assessment Methodology, Assessment Process and Locations of Assessment	
2.2.1	Figure of person days to implement assessment
ASA 4	<p>Number of auditors: 4 auditor</p> <p>Number of days for ASA 4 at site : 4 days</p> <p>Number of working days for ASA 4 at site : 16 Working days</p>
2.2.2	Assessment Process
ASA-4	The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT. Agronusa Investama to the requirements of Indonesian National Interpretation of RSPO Principles and Criteria 2013 by INA-NITF, July 2016 (Endorsed by the RSPO Board of Governors meeting on 30th September 2016) and RSPO

Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014 (Module D / E for CPO Mill).

During the ASA-4 activity there was an extension scope for certification which include the two smallholders (Sentama Lestari Kooperatif and Cempaka Biru Kooperatif). The associate smallholders manage as full manage and the standard use is Indonesian National Interpretation of RSPO Principles and Criteria 2013 by INA-NITF, July 2016 (Endorsed by the RSPO Board of Governors meeting on 30th September 2016).

The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) *interview*, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site.

Some opportunities for improvement of the results **ASA-4** delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase **RC**.

Improvement of findings from main assesment findings were observed by auditors at this **ASA-4** assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of **ASA-4**.

The assessment program please find Appendix 2

2.2.3	Location of Assessment
ASA-4	<p>Number of units in this certification activity is 1 (one) estate and 2 (two) smallholders, which supply the raw material (FFB) to ANI palm oil mill. In conducting the assessment, the team of auditors used the $0.8\sqrt{y}$ formula to determine the management units sampling to be focused on and also considered the issues raised by stakeholder. Based on this formula, the team of auditors determined that the sampling locations are 1 palm oil mill (ANI POM), 1 estates (ANIS estate) and 2 (two) smallholders : Sentama Lestari and Cempaka Biru</p> <p>ANI Estate</p> <ul style="list-style-type: none"> • Division Senabah Block 035 A/B. Observation and interview with supervisor and worker in spraying activity. • Division Senabah Block 038A <ul style="list-style-type: none"> ➢ Observations regarding to nutrient recycling strategy using Empty Fruit Bunch ➢ Observations regarding to pest control with beneficial plant (<i>Turnera Sp.</i> and <i>Casia Sp.</i>) • Division Senabah Block 027D <ul style="list-style-type: none"> ➢ Observation regarding to the use of owls as a pest controller. ➢ Observation regarding to erosion monitoring using erosion stakes ➢ Observation and interview with supervisor and worker in harvesting activity • Division Senabah Block 040A and 039D. Observation regarding to peat soil management using drainage system, weirs, water level monitoring, and subsidence peat soil. • Division Senabah Block 002 and 003. Observation to area of replanting plan to know the soil type. • Division Senabah Workshop. Interview with worker related to OHS, worker welfare, and emergency response. • Division Senabah Hazardous Waste Storageae. Observation about condition of temporary storage, monitoring hazardous waste, and emergency facilities. • Division Senabah Housing Phase I. Observation and interview with worker related to housing facilities, such as electricity, water source, child care, school, etc. • Clinic. Observation and interview related how to handle medical waste, and clinic facilities. • Division Kumpai Agrochemical Storage. Observation and interview with storage operator related to chemical mixing technique, work safety in agrochemical storage. • Division Kumpai Workshop. Interview with worker related to OHS, worker welfare, and emergency response • Division Kumpai Housing Phase 5. Observation and interview with worker related to housing facilities, such as electricity, water source, child care, school, etc.

- **Senabah Division Boundary Poles Inspection:** Boundary poles sampling checks consist of: Pole 114, 115, Pole 116 Block 320, Pole 119 Block 903 and Pole 127 Block 122. The poles was installed in good condition and the poles numbers can be read clearly.
- **Kumpai Division Boundary Poles Inspection:** Boundary poles sampling checks consist of: Pole 114, 115, Pole 116 Block 320, Pole 119 Block 903 and Pole 127 Block 122. The poles was installed in good condition and the poles numbers can be read clearly.
- **Kumpai Division Block 035:** Observation of harvesting activity, Safety & Health implementation and Worker Right
- **Kumpai Division Boundary Poles Inspection:** Boundary poles sampling checks consist of: Pole 16 Block 075, Pole 17 & 18 Block 74, Pole 19 & 20 Block 073. The poles was installed in good condition and the poles numbers can be read clearly.
- **Kumpai Division Block 64 :** observation of fire tower monitor
- **Kumpai Division Block 265 :** Box Owl Barn observation
- **Estate Office :** Interview with workers of pest and disease

ANI Palm Oil Mill

- **Mill office:** Supply Chain Certification System (SCCS) verification and interview related personnel in charge to supply chain system
- **Weight bridge :** Observation and interview of personnel related to FFB received mechanism and documented system
- **Management Process.** Observation and interview with personnel related to FFB's processing into CPO, capacity each station, personnel understanding over the applicable SOP, fire emergency response facilities and infrastructure in mill, liquid waste management, first aid kits, the implementation of occupational health and safety, company's facilities, trainings from company and worker welfare.
- **Loading Ramp.** Observation and interview with sortation personnel related to personnel understanding over sortation procedure, the implementation of sortation, fruit criteria, fruit separation with ripeness and rawness criteria.
- **Power House Room.** Observation and interview with the worker related to implementation of OHS, understanding of safe working, administration of fossil fuels use.
- **Boiler's Room.** Observation and interview with the worker related to implementation of OHS, understanding of safe working, overtime calculation.
- **Workshop.** Observation and interviews with employees related to management of hazardous waste and hazardous material, training, provision of PPE, training, emergency response facilities
- **Kernel Station.** Observation and interviews with employees related to management of hazardous waste and hazardous material, training, provision of PPE, training, emergency response facilities
- **POM area.** Based on file observation on POM, known that the fibers and shell is used as fuel to reduce fossil fuel consumption and maximize renewable energy.
- **Hazardous Waste Storage.** Observation and interviews related to waste management activities and OHS implementation.
- **WWTP.** Observation and interviews related to waste management activities and OHS implementation.
- **Chemical Storage.** Observation related to waste management activities and OHS implementation.

Cempaka Biru Plasma

- **Block 937.** Observations regarding to pest control with beneficial plant (Turnera Sp.)
- **Block 925.** Interview with supervisor and worker for spraying activity.
- **Block 916.** Observation and interview with supervisor and worker in harvesting activity
- **Block 927.** Observation regarding to the use of owls as a pest controller.

Sentama Lestari Plasma

- **Block 907.**
 - Interview with supervisor and worker for spraying activity.

- Observation regarding to peat soil management using drainage system, weirs, water level monitoring
- **Block 910.** Observation regarding to monitoring of peat subsidence using a stakes.

Stakeholder Consultation

- Interview with government of Sambas District consist of Labour Agency and Enviroment Agency.
- Focus Group Discussion with head of village and communities around the company consist of Senabah Village, Beringin Village and Semanga Village (including the representation of Sentama Lestari and Cempaka Biru Smallholder)
- Interview of local contractor

2.3 Stakeholder Consultation and Stakeholders Contacted
2.3.1 Summary of stakeholder consultation process.

- ASA-4** Summary of stakeholder consultation process
Consultation of stakeholders for PT Agronusa Investama was held by:
- Public Notification on 03rd February 2017 PT Mutuagung Lestari Website (<http://mutucertification.com/wp-content/uploads/2017/02/Notification-of-Surveillance-4-RSPO-ANI-POM-PT-Agronusa-Investama.pdf>)
 - Public consultation meeting with government of Sambas District conducted by visits and interview on 20th February 2017
 - Public consultation meeting with local stakeholder conducted by FGD and interview on 20th February 2017
 - Public consultation meeting with internal stakeholder on 23th February 2017
 - Public consultation with NGO by email conducted on 17th February 2017

2.3.2 Stakeholder contacted

Please find appendix 1

2.4 Determining Next Assessment

The next visit (**Re-Certification/RC**) will be determined one year after this **ASA-4** (February 2018).

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Agronusa Investama POM – PT. Agronusa Investama operation consisting of one (1) mill, one (1) oil palm estate and two (2) smallholders.

During the assessment, there were two (2) Nonconformities were assigned against Major Compliance Indicator; three (3) nonconformities were assigned against Minor Compliance Indicators; and seven (7) opportunities for improvement were identified.

Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5. The company has already prepared and implemented the corrective action(s) that had been reviewed and accepted by Auditor(s) in form of documentation evidence(s) e.g. (document record/photographic/etc...). Those corrective action(s) taken that consist of two (2) Major non-conformities had been closed out shall be verified during next assessment.

MUTUAGUNG LESTARI found that Agronusa Investama POM – PT. Agronusa Investama., Wilmar International Ltd complied with the requirements of *Indonesian National Interpretation of RSPO Principles and Criteria 2013 by INA-NITF, July 2016 (Endorsed by the RSPO Board of Governors meeting on 30th September 2016) and RSPO Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014 (Module D / E for CPO Mill).*

Therefore MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is **Continueud**

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
PRINCIPLE #1 COMMITMENT TO TRANSPARENCY		
1.1	Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	
1.1.1	<p>Company has the newest list of stakeholder, consist of statutory bodies, leader community, smallholders, contractors, worker organizations, and NGOs. Based on interview with company's management, the list of stakeholders have been updated every time there is a revision/ change or will be updated every year. Based on interview with related stakeholders, they've already know the person in charge for communication with stakeholder. Bina Mitra division is in charge for providing and updating the list of stakeholder and communicating, and provide, update and response the information for stakeholders</p> <p>There is communication procedure "SOP of Providing Information for Other Party (Tranparency) No nomor SOP 52/WIP-KB/(02)/0911 dated 2nd November 2015. It explains the kind of documents that can be accessed publicly and the time given to respond the request for information from stakeholders. Based on interview with related stakeholder, it is known that they don't have difficulties to communicate with the company for information request.</p>	
1.1.2	<p>The person in charge for communication and consultation is Bina Mitra Division, it is written on job description of Bina Mitra Division. Procedure for dissemination is written on "SOP of Providing Information for Other Party (Tranparency) No nomor SOP 52/WIP-KB/(02)/0911 dated 2nd November 2015. It explains the kind of documents that can be accessed publicly and the time given to respond the request for information from stakeholders. The response to incoming mail not later than 14 days after the letter was received. Record of information is written on the information book "Buku Surat</p>	

Masuk". In the book shows that there is no incoming information requests, there are only proposals, and invitation to attend meeting held by stakeholders.

Status: Comply

1.2

Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.

1.2.1

Company has list of document that can be accessed publicly and documents that can be accessed with General Manager approval which is written on SOP of Providing Information for Other Party (Transparency) dated 2nd November 2015. The public documents, such as environmental document, company annual report, general policies, licensing includes land use title and decree of land use title, operational licenses of plantation activities, environment, OHS, and social reports, organizational structure, identification risk, land use data, report of position and the amount of labor, plans for continuous improvement, OHS program, and so on. These documents are available in estate and mill office.

Company has monitoring and management report, such as employment report, business activity report of palm oil plantation industry, report of environmental management and monitoring plan, and so on. These documents also can be accessed by public through the mechanism which has determined by the company.

Status: Comply

1.3

Growers and millers commit to ethical conduct in all business operations and transactions.

1.3.1

Company has code of conduct No. 044/DIR-KP/XII/2015 dated 15th December 2015 signed by Sustainability Division Head, HRGA Corporate Head and Country Head. There are 3 principles on code of conduct, namely to avoid conflict of interest, to avoid misuse and/or abuse of position, and to ensure confidentiality of information and to prevent misuse of information gained through the company's operations, either for personal gain or for any purpose other than that intended by the Company. Based on interview with workers in ANIS Estate, they understood about this policy. This policy has been socialized to the worker, such as socialization on 14th March 2016 to Cempaka Biru Smallholder workers, attended by 24 participants, 17th, 25th, and 29th February 2016 to ANIS Estate workers, attended by 106 participants, and 24th October 2016 to ANIS POM workers, attended by 12 participants. This policy is available in Indonesian Language.

Status: Comply

PRINCIPLE #2 COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS

2.1

There is compliance with all applicable local, national and ratified international laws and regulations.

2.1.1

- Company has implemented the governor decree related to sectoral minimum wage for 2017.
- Company has registered the workers to work and health insurance. This is in accordance with the Government Regulation No. 44 2016 on Implementation Program of Work Accident and Life Insurance; No 45 2016 on Implementation Program of Retirement Insurance, and No 46 on Pension Plan.
- There is temporary daily worker who work more than 21 days for 3 months or later and no work agreement for them. This is not accordance with Labor Ministerial Regulation No 100 2014. **Nonconformity No. 2017.01 with Major Category**

Occupational Health and Safety

- The company has had 3 licensed boiler operators and the license is still in the validity period. This is in accordance with the Labor Ministerial Regulation No. 01 of 1988 on Qualifications and Requirements of Boiler Operators.
- The company has had 1 OHS Electrical Technician, it is in accordance with the Labor Ministerial Regulation No. 12 of 2015 on OHS Electricity in The Workplace
- The company has had 11 operators that have Heavy Equipment Licenses, however it is known that there are 9 licenses has been expired. For example, license named Edi Susanto (Excavator Operator of ANI Estate) has been expired on June 1, 2016. This is not in accordance with Labor Ministerial Regulation No. 09 of 2010. **Nonconformity No. 2017.01 with Major Category**

2.1.1 **Status: Nonconformity No. 2017.01 with Major Category**

2.2

The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.

2.2.1

a. Land Tenure

Until the ASA 04, Certificate of Land Use Right of PT Agronusa Investama not yet issued, there is a Request Revision Land Right Map on behalf of PT Agronusa Investama by the Director of PT Agronusa Investama Number: 054 / ANI-BM / HGU / IX / 2014, dated 22 September 2014 to National Land Agency (BPN) of West Kalimantan Province and ensure Status Moratorium. But until now there has been no significant progress for the certificate of Land Use Right.

NCR 2017.02

b. Land Use Legalities

- Plantation Business Permit (IUP) based Sambas Regency Decree No. 37 of 2005, dated March 10, 2005, on the Granting of Plantation Business Permit (IUP) to PT Agronusa Investama spacious area in the area of 12,500 to 14,000 hectares.
- Renew of Plantation Business Permit (IUP) based Sambas Regency Decree No. 372 of 2008, dated December 19, 2008, on the amendment decree to 12,500 Sambas spacious area in the area of 14,000 hectares of oil palm and processing plant with a capacity of 60 Tons FFB / Hour.

Until the ASA-04 PT HGU HGU certificate has not been published, plasma area covered or included in Plantation Business Permit (IUP) of PT ANI Sambas, that is Renew of Plantation Business Permit (IUP) based Sambas Regency Decree No. 372 of 2008, dated December 19, 2008, on the amendment decree to 12,500 Sambas spacious area in the area of 14,000 hectares of oil palm and processing plant with a capacity of 60 Tons FFB/Hour.

The plasma areas in the field was still in same area of PT ANI and was only separated by block boundaries. The legal basic for the management of Sentama Lestari and Cempaka Biru Smallholder is the Decree of the Regent of Sambas Number 194 Year 2010, on 17 June 2010, on the Appointment of Prospective and Candidates of Participants of Plantation (Calon Petani Calon Lahan) as Revitalization Program of Palm Oil Commodity In Semanga and Sepantai Village-Sejangkung Sub District and Beringin Village- Sajad Sub District, Sambas District. These smallholder programme is full manage by management of PT ANI Sambas. Based on the explanation from representative management of PT ANI Sambas, the area and boundaries of the of the core plantation of PT ANI Sambas and the plasma area will be clarified with the boundary marks when the HGU Certificate of PT ANI issued by the National Land Agency. Based on Area Statement PT ANI and Smallholder, totally is 9,241.70 Ha, the details of each area are:

- ANI Estate: 7,910.93 Ha
- Sentama Lestar Smallholder: 858.77 Ha
- Cempaka Biru Smallholder: 472

2.2.2

Based on document of monitoring of boundary markers per December 2016 that knows there are 82 poles in Kumpai Division and 85 poles in Senabah Division. Based on the field visits checking of boundary markers in Senabah Estate (Sampling boundary poles: 114, 115, 116, 119 and 127) and in Kumpai Division (Sampling boundary poles: 016, 017, 018, 019 and 020), it is known that the condition of boundary was good and the numbers can be read clearly. PT Agronusa Investama also has procedures related to installation and maintenance of boundary poles, namely SOP number 001/SOP/GIS/2014 on the Installation and Monitoring Boundary Poles, effective since July 1, 2014. The SOP describes the three-monthly monitoring schedule and repair of boundary poles were missing in any period of 3 months.

2.2.3

Based on the verification of documents of Area Statement that known there was any area of PT Agronusa Investama area number of 127.87 hectares cultivated by others. The results of field visits in Kumpai Estate was shown there is an area between Block E051 (Core Plantation) and Block 914 (Smallholder Area) was occupation by the other party for rubber plantation and semi-permanent houses. The company has not been able to show evidence of record on handling those areas. **NCR 2017.03**

2.2.4 & 2.2.5

Based on documents verification and interviews with relevant staff (Staff of Legal Document) during ASA 04, obtained the information that there were no cases of land disputes was happening with the public or other parties. From the results of a public consultation with the Head of Beringin Village and Semanga Village, and Cooperative Management of Sentama Lestari Beringin Village and Cempaka Biru Semanga Vilalge also known that there was no issues related to land disputes between the PT Agronusa Investama with the parties. The company keep all evidence of the completion of recording land issues in the past. Against the land dispute cases that have occurred, provided evidence of the dispute settlement acceptable to all parties. Evidence in the form of recording of the Minutes of the Meeting and Negotiation Agreement as agreed by the parties, document of land acquisition from the previous owner who through the FPIC process. Negotiation process involving the Village Committee, head of village, landowners and management representatives by the company.

2.2.6

There was available Human Right Policy Wilmar International Limited which was published in June 2014 and endorsed by the Group and Group Head Plantation CSR Head. In the policy stated that the commitment Wilmar supports the respect and protection of human rights as a policy anti child labor, OHS, providing equal opportunity for everyone, reports and complaints, anti-sexual harassment, anti-violence and torture, respect for reproductive rights, and social responsibility company. This policy applies to all companies under the auspices of the Wilmar group and business unit has relationships including suppliers and contractors. Based on the results of consultation with employee representatives (Committee on Gender and Labor, Government of Community of Beringin and Semanga Village, and related institutions in Sambas district, that known there was no issues of the use of confrontation and intimidation by the company to maintain peace and order, and there is no indication there is no indication of the use of military and mercenaries

2.2.1 2.2.3	Status: Non Conformity No. 2017. 02 with Major Category Non Conformity No. 2017. 03 with Minor Category	Open
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2.3

Use of the land for oil palm does not diminish the legal rights, or customary rights, of other users, without their free, prior and informed consent.

2.3.1

Based on the report document Identification of HCV in the area of oil palm plantation of PT Agronusa Investama, there was not find the region in the control or management based on indigenous rights in the area of these company. The sources of land acquisition of the company was derived from the ground state (as evidenced by the issuance Map Parcel Number: 072-14.02-2011 of \pm 7,910.929 ha, dated August 16, 2011) and most of the arable land that have been made public compensation process. The process for resolving public land release conducted in 2008, involving related parties. The process of awarding compensation Indemnity has been completed in 2008.

2.3.2

PT Agronusa Investama was archived all documents of land compensation process. The document was formatted in the Indonesian language that is easily understood by the parties, including the amount of compensation that is based on rules (standards) as determined by the local government (Compensation for destroyed crops). It has been shown an example of land compensation process, for example Statement of Waiver Agreement who entered the Land Administration Satai Hamlet, Sepantai village, district. Sejangkung, dated 22 September 2008. The land area of \pm 170 Ha in the image measuring HGU PT Agronusa Investama Plans are administrative regions Satai Hamlet, Village Sepantai with boundaries: North (Measure plan HGU); Western (Hamlet Region State Land Satai); East (Region State Land Satai Hamlet); South (Measure plan HGU).

There was also available sample of documentation of agreements that have been negotiated in accordance FPIC (*Free Prior for Informed Consent*). These documents consist of period 2008. The agreement handover of land from the previous owner has been through a process of consultation, negotiation and agreement of the parties. The negotiation process involves representatives of the company, representatives of the community (the rural landless) and Head of the village. Each compensation process accompanied by statement by the society has handed the land to the company and will not be demanded in the future.

2.3.3

The company has archived all documents related to the process of restitution of land has ever done. The document is presented in the Indonesian language that is easily understood by the parties, including the amount of compensation that is based on rules (standards) as determined by the local government (Compensation for the plant or crops).

2.3.4

In the process of negotiations and land compensation, has shown evidence form of a Statement Form and signed by the parties. For example, there was evidence of land compensation signed by the Village Head Sepantai, Sepantai Village Representative Board Member, Head of Satai Hamlet, Head of Sejangkung District and Manager of PT Agronusa Investama. The statement letter has been recorded and registered on May 1, 2009 by Notary HARDIANSYAH, SH No. 35 / LIST / V / 2009.

Status: Comply

PRINCIPLE #3 Commitment to long-term economic and financial viability

3.1

There is an implemented management plan that aims to achieve long term economic and financial viability.

3.1.1

Long-term management plans made separately between PT ANI and Smallholdings that recorded in the document:

- PT.ANI long-term management plans are recorded in the document of Projections years 2017-2021, which explaining the budget and projections of operational activities in Plantation and Factory including financial aspects, area statement, productions of Estate and Mill, the cost of operational for Estate and Mill, FFB processed, plantation development expenditure for Estate and Mill, capital expenditure and sustainability implementation cost (Environmental, Social, Health and Safety Work).
- Smallholdings long-term management plans are recorded in the document of Cash Flow Projection of smallholders FFB sales years 2016-2021 which describes the total of areal statements, FFB production, the calculation of income from FFB sales, Operating Expenses and payment of the bank.

Budget evaluation activities performed annually and recorded in the document Crop & Cost Presentation To date in December 2016. The evaluation conducted a discussion about the difference between budget and actual operational activities of PT ANI and smallholders.

For the improvement of practices, the company has Agronomy Manager in charge and responsible to conduct experiments and training on the implementation of the agronomy trials. This is based on the Position Description No. POD-031 / ANI-SBS / XII / 2011 dated December 1, 2011

3.1.2

The company can show documents Plan of Replanting Area and maps of replanting plan area with a scale of 1: 50,000 dated September 3, 2015 for the years 2017-2021. Replanting plan document is also equipped with the data of year of planting, Block location, the yield from 2013 until July 2015, the soil type and the plan years of replanting. In the document, it is known that the planing of replanting on 2017-2021 is planned only in the ANI Estate while in the smallholdings not yet planned for replanting.

Status: Comply

PRINCIPLE #4 Use of appropriate best practices by growers and millers

4.1

Operating procedures are appropriately documented and consistently implemented and monitored.

4.1.1

The SOP unchanged from the previous assessment listed in the Handbook of Agronomy and Palm Oil Mil SOP. The entire SOP is available in Indonesian and stored in the Document controller. Based on interviews with harvest and spray worker in the ANI Estate, Sentama Lestari and Cempaka Biru smallholders, it is known that workers have been trained and be able to explain the work mechanism in accordance with the procedure, such as harvest workers may explain the criteria of fruit that can be harvested and spray workers can explain the wide of circle and harvest path in accordance with procedure.

4.1.2

The Company showed Job Description for the Department System Development Control (SDC), which explains that the main duty is to ensure the work has been conducted properly and correctly according to plan and targets based on the system, procedures and working mechanisms in accordance with the SOP. Monitoring activities conducted two times each year, for the monitoring activities in PT.ANI on 2016 was conducted on 10 to 23 March 2016 and 13 to 23 September 2016.

4.1.3

The Company showed the recording of monitoring that conducted by the Department System Development Control (SDC) on the document of SDC Visit Report, for example in the report with the number 018/SDC/Reg Kalimantan-1/IX/2016 held on 13 to 23 September 2016. Corrective actions of non-compliance are recorded on the document of Finding Progress. All non-compliances in activities on September 2016 has been fulfilled in October 2016. For example, an error in awarding Job Code loader that should be harvester in the computerized system data and the company has been fulfilled all of nonconformities

4.1.4

The ANI Sambas POM has listed the outsider FFB supplier, consist of :

- Kaharuddin
- Latif Muhlid
- Rahmat Hidayat
- Ketut Mahardika
- PT Kapuas Jaya Abadi

Status: Comply	
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4.2

Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.

4.2.1

SOP about soil fertility management is unchanged from the previous assessment that contained in the document of agronomy and oil palm SOP Handbook on 2015. The SOP describes the technical management include land clearing and preparation in the area of hilly, steep, swamp coastal and low-lying, planting and maintenance of Land Cover Crops (LCC), the maintenance of oil palm, fertilization technical and application of mulching using empty fruit bunches (EFB).

Based on field visits and verification of documents, is known the company has implemented SOP about soil fertility management, among others:

- In ANI Estate Division Senabah Block 038A, it is known that there is Empty Fruit Bunch are applied between the oil palm trees.
- Can show the results of the soil analysis, leaf analysis and visual observation as observation of plant nutrients
- Conducting the fertilization and recorded in the document of Fertilizer Programme

4.2.2

The company can show the recording of fertilization in the document of Fertilizer Programme on 2016 which describes the planned activities and realization of fertilization. There are some fertilizing activities that have not conducted according to plan, for example NPK Super K and MOP. This is due to the unavailability of fertilizer in the warehouse (supplier late sending fertilizer to the Regional Office).

Based on the documents verification, the company has not been able to show:

- The Company has not been able to show evidence of fertilization record for Cempaka Biru Smallholders.
- Based on the verification of Fertilizer Programme on 2016 for Sentama Lestari Smallholders, it is known that fertilization activities do not conducted in accordance with the program and the company has not been able to show the evaluation of it.

(Nonconformity No. 2017.04 with Minor category)

For the recording of fertilizer/ton FFB recorded in Data of Fertilizer Usage Per Ton FFB on 2016 that describes the amount

of fertilizer a year, the total production and total use of fertilizer/ton FFB. for example:

ANI Estate

Fertilizer	FFB Production	Amount of Fertilizer	Fertilizer/ ton FFB
NPK Super K	142,180.67	3,151.98	0,022
Dolomite	142,180.67	247,11	0,002
Urea	142,180.67	368	0,003
MOP	142,180.67	1,108.86	0,008

Smallholders (Cempaka Biru and Sentama Lestari)

Fertilizer	FFB Production	Amount of Fertilizer	Fertilizer/ ton FFB
NPK Super K	12,707.23	130,00	0,0102
Urea	12,707.23	57,50	0,0045
MOP	12,707.23	53,00	0,0042

4.2.3

ANI Estate, Sentama Lesatri and Cempaka Biru Smallholders showed recording of activities to observe nutrients, among others:

- Leaf analysis conducted in 2016 to determine the nutrients N, P, K, Mg, Ca, B, Cu, Zn and Fe.
- Soil analysis conducted on 2015 by sampling based on the Soil Series on Map of Soil type. All the results from the soil analysis contained in documents Ref. No. 01/Land/II/2015/ANI dated January 7, 2015 on the Soil Analysis Report. Parameters are tested include pH, organic C, total N, P Bray, P total, Exchange cations (K, Mg, Ca, Na), CEC and texture.
- Visual observations are recorded in Field Observation Card that describes the identification of symptoms of nutrient deficiencies, basic conditions and land conditions. Observations were carried out concurrently with leaves sampling.

4.2.4

Based on documents review and field visits, it is known that the company implemented an empty fruit bunch as recycling of nutrients. For liquid waste is not applied in the field because the company area is sandy soil and peat land. Whereas fiber and shells are used for boiler fuel.

Recording for monitoring the recycling program are documented on Empty Fruit Bunch Application Program on 2016. For example, in Division Senabah Phase 2 there are plans to apply EFB for area of 710.2 ha and has been realized. Based on field visit in ANI Estate Division Senabah Block 038A, it is known that there is Empty Fruit Bunch are applied between the oil palm trees.

Status: Nonconformity No. 2017.04 with Minor category

4.3
Practices minimize and control erosion and degradation of soils.
4.3.1

The Company can show Map of Soil Type for ANI Estate and Smallholders (Cempaka Biru and Sentama Lestari) that created by Param Agricultural Soil Survey Sdn. Bhd. with a scale of 1: 50,000. Based on a map, it is known that the soil types in the company is sandy soil and peat soil.

4.3.2

Based on Slope Map of PT. Ani Sambas (ANI Estate and Smallholders), slope of the land in the plantation area is dominated with flat area (0-6%) and slightly wavy (6-12%) so there is no management for an area with a certain slope. Based on the field in the ANI Estate, Sentama Lestari and Cempaka Biru, it is known that the slope of the land is dominated by flat and slightly wavy.

4.3.3

The Company showed Budget 2017 in which explains the program and cost for road maintenance. Maintenance activities carried out using heavy equipment and also perform street paving. Based on the field visit in the ANI Estate, Plasma Sentama Lestari and Plasma Cempaka Biru, during the visit all roads are still accessible and there are some sections of

road are maintained by giving the wood, for example in Plasma Cempaka Biru Block 937.

4.3.4

There is no change in the SOP on the management of Peat that stated in SOP management of peat areas (SOP No. SA 02/WIP-KB/(0)/2010) explaining about Management and Monitoring of Peat Soil for Oil Palm Planting Precisely.

Based on visits to blocks 040 and 039 Division Sebanah and blocks 907 and 910 Plasma Sentama Lestari, it is known that water management conducted by making field drains, collection drains and main drains. Water management systems conducted by using the overflow with weirs on the collection drain and equipped with a water level markers for monitoring the water level. Weirs are made with the floodgates with a depth of 60 cm below the ground surface so that the water can be maintained at a depth of 60 cm. In the area, there is a fern which function is to cover the ground.

The Company showed document of Monitoring of Water Level at Peat Area which describing the water level every day. For report in December 2016, there were 44 water level markers at Division Senabah by an average of water level is 30-80 cm and in Division Kumpai there are 30 water level markers by an average of water level is 20-70 cm. When visiting the field at block 040, it is known that the water level is 20 cm below the ground and in the block 907 the water level is at 30 cm, this was due to high rainfall.

4.3.5

At the time of the assessment, the company not yet conduct replanting, however there are plans of replanting activities on 2017. Based on the map of soil types and site visits in the area of replanting plan (blocks 002 and 003 Senabah Division), it is known that soil type on that area is sandy soil and partly swamp area with little organic material. The Company need to re-ensure the soil type at replanting plan areas. **OFI**

4.3.6

At the time of the field visit in the area of sandy soil, it is known that the company has made efforts to increase soil fertility by conducting the empty bunch applications eg in ANI Estate Division Senabah Block 038A.

Status: Comply

4.4

Practices maintain the quality and availability of surface and ground water.

4.4.1

The company has tested the waters Maknyuri period of Juli - December 2016 according to the EIA document. The test results are not in accordance with PP 82/2001. The company has conducted an evaluation and improvement to maintain the water quality, for example installation boundary markers of chemical application on riparian, installation signboard, and socialization to employees.

4.4.2

The Company has conducted riparian protection in accordance with procedures, such as socialization to employees and the surrounding village communities; installation boundary markers of chemical application on riparian; HCV signboard installation and planting trees on the Sentakul riparian.

4.4.3

The company has tested the quality of mill effluent periodically at an accredited institutions (Laboratory of Kesehatan, Kalimantan Barat Province). The test results are in accordance with national regulation No. 5/2014 (BOD outlet \leq 100 mg / liter). The test results periodically sent to the local government (*sighted: Receipt report No. 009 / PKS-ANI / I / 2017, January 21/2017*). There is no utilization of mill effluent in the land (*land application*). Mill effluent flowed in the water or water source that already have permission from the government (*sighted: Government Decree No. 421 / BLH / 2016, dated May 16/2016*).

4.4.4

Based on field observation in St. WTP known operator has recorded water use through observation of flow meter. Use of water factory customized with a budget that been assigned every month are 1.44 m³ / t FFB. Operator have been using full PPE when working.

Status: Comply

4.5

Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.

4.5.1

Program of integrated pest control are listed in the Handbook of Agronomy and SOP of Oil Palm on 2015 Chapter 8 about Plant Protection of Pests and Diseases. The document explaining about the detection and census, the threshold, the control by means of biological, chemical and manual.

Identifying potential pests is done by conducting census pest/disease. Based on the results of monitoring rat and caterpillars in the September-December 2016, it is known that the pest infestation still below the threshold.

Based on the field visit in ANI Estate, Plasma Cempaka Biru and Plasma Sentama Lestari, it is known that the company has implemented a biological pest control, for example the installation of owl cages as a place to stay owl (*Tyto alba*) are mounted on the block 927 in Plasma Cempaka Biru and Blocks 027D in Senabah Division. In addition, every edge of the blocks has a beneficial plants with the kind of *Turnera subulata* and *Casia Sp.*

4.5.2

The Company has shown the training records about Integrated Pest Management in the form of Minutes and Attendance List, for example Integrated Pest Management Training on 21 September 2016 to 18 employees in the Kumpai Division. However the company could not show evidence of IPM training to workers on smallholdings. **Nonconformity No 2017.05 with Minor Category**

Based on interviews with worker of Pest and Disease for ANI Estate, explained that it had given training related to the census and explained how to do the census as well as the course of action if the value is above the threshold.

Status: Nonconformity No 2017.05 with Minor Category

4.6

Pesticides are used in ways that do not endanger health or the environment

4.6.1

The Company has document of Agrochemical Justification List on 2017 describing the types of pesticide used, active ingredient, WHO grade and weeds target. For example Glisat active ingredient Glyphosate 480 SL with the target are broad-leaved weeds and narrow leaves.

Based on interviews with the foreman of pesticide application in ANI Estate Division Senabah Block 035A/B, explained that the activities were carried out using herbicide with kind of Glisat (glyphosate) and Tiara (methyl metsulfuron). Herbicides were chosen because of the dominance of weed on the block is narrow and broadleaf leaved weeds.

4.6.2

The company has had Handbook of Agronomic and SOP of Oil Palm on 2015, in Chapter 6 about Maintenance of Oil Palm there are programs for pesticide application. To record the uses of pesticides, the company has had document of Analysis of Active Ingredients Usage Per Ha on 2016, for example:

Pesticide Name	Active Ingredient Name	LD50-Oral	Area of Application	Total Pesticides	Total Active Ingredients	Active Ingredient/Ha
Glisat	Isopropilamina Glyphosate	>5000 mg/kg	40,147.96	46,170.15	22,161.67	0.54
Tiara	Methyl Metsulfuron	371 mg/kg	30,958.23	30,339.07	6,067.81	0.02

4.6.3

Program of integrated pest control are listed in the Handbook of Agronomy and SOP of Oil Palm on 2015 Chapter 8 about Plant Protection of Pests and Diseases (see indicator 4.5.1). Based on the SOP, pesticides are not used to perform preventive action (prophylactic use), however pesticides are used when the results of census pest/disease has exceeded the threshold.

Based on the field visit in ANI Estate, Plasma Cempaka Biru and Plasma Sentama Lestari, it is known that the company

has implemented a biological pest control, for example the installation of owl cages as a place to stay owl (*Tyto alba*) are mounted on the block 927 in Plasma Cempaka Biru and Blocks 027D in Senabah Division. In addition, every edge of the blocks has a beneficial plants with the kind of *Turnera subulata* and *Casia Sp.* Based on document of Analysis of Active Ingredients Usage Per Ha on 2016, there is no use of pesticides for pest or disease control.

4.6.4

The Company has a book of World Health Organization of Pesticides Classification describes about the category of pestisida 1A and 1B. The company also shows the Handbook of Agronomy and SOP of Oil Palm on 2015 Chapter 8 about the Plant Protection of Pests and Diseases. The SOP explaining that the use of pesticides for rat control only performed on blocks that census result showed symptoms of damage more than 5% and in Chapter 6 explained that the company does not using paraquat for weed control.

Based on review documents of Pesticide Uses, it is known rodenticide use with active ingredients coumatetralyl/warfarin are decreased. The rodenticide used on 2015 as much as 4.276 kg and in 2016 as much as 2,250 Kg.

The Company showed Program for Making Owl Cage period 2016 which explains the program period July to December 2016 and has realized mounting as much as 9 units, in Division Senabah 2 units (blocks 119 and 122) and 3 unit in the Division Kumpai at block 105, 027 and 010. Based on the field visit in Division Kumpai block 027 and in Plasma Cempaka Biru block 927, there are a owls cage (Gufon) in the good condition.

Based on the explanation, it is known that the company has demonstrated efforts and programs to reduce the use of pesticides that are included in WHO category 1A, 1B and paraquat.

4.6.5 & 4.6.9

Based on field observation and interview with worker in ANIS Estate, it is known that pesticides are kept in agrochemical storage. The storage operator understood how to mixing the pesticides and work procedure in agrochemical storage. MSDS are available in the storage and the worker also understood it. The PPE is in accordance with the risk identification and MSDS. Based on interview and field observation to agrochemical storage, it is known that the pesticides was mixing in the storage or mixing place. The mixing pesticide is brought to the field by special vehicle and then poured into each spraying workers cap. The spraying worker is wearing PPE when pouring the pesticide to its place and there is no spills on the ground.

Based on interview with worker sprayer, they know the the correct way to spray the pesticide and dosage recommendation is in accordance with the lable of pesticides. They also have received training from the company, such as spraying best practice training on 15th Januari 2016 attended by 20 participants (workers form Phase 1, 3B, and smallholder). The training was about the correct way for spraying and inspection of PPE. All work equipments are kept in separate storage and ex pesticide containers is kept in temporary storage of hazardous waste. Based on document review, The inventory in chemical storage is in accordance with the inventory records.

4.6.6

Pesticide management has been implemented in accordance with the LB3 of management procedures.

Ex pesticide containers from Senabah and Kumpai Division stored hazardous waste storage approved by local government located in Division Kumpai (Letter Decree No 422/BLH/2016), then handed over to the licensed collecting LB3 (PT Mitra Karya Surya Kencana), after that was reported to the local government periodically.

Sighted: neraca LB3 triwulan IV; record LB3 triwulan IV; receipt submission LB3 to PT Mitra Karya Surya Kencana dated November, 24/2017; ex pesticide containers manifest No. AHK 0000329 covered 0.449 ton; truk number KB 9611 SA; receipt LB3 report to local government dated Jan, 10/2017.

The company has the opportunity to document the use of ex pesticide containers in the balance sheet and monthly record LB3, other than in the Bin Card as has been done. **OFI No. 2**

Based on field observation in Housing complex of Division Kumpai and Senabah, no found pesticide use packaging as clean water or drinking container.

4.6.7

Based on interview with spraying worker, it is known that they understand the work procedure for spraying and wear the PPE in accordance with the MSDS, such as gloves, safety shoes, apron, mask, and face shield. They also have received regular training for spraying best practice. The company provided PPE storage for the spraying worker for keeping all

PPE after use it. There is a facility for worker cleaning up after work near the PPE storage.

4.6.8

Based on the field visit on the activities of pesticide application, it is known that the application of pesticides is conducted by using a sprayer and not through the air.

4.6.10

The Company has conducted management training for staff and LB3 operators (*Sighted: training attendance lists March 31/ 2016*), with participants as many as 18 people. Interview with generators and personnel carriers LB3, that they have understood the management of LB3.

4.6.11

Company has a list of pesticide operators as many as 96 operators, consist of male and female. The operators has medical examination periodically on cholinesterase to ensure the condition of worker is in good health. The medical examination has conducted in January 2017. Based on interview with worker who dealing with agrochemical, they have examined and the result is informed to the worker.

4.6.12

There is intern memorandum No. 058/HRR/INT/V/2012 dated 31st May 2012 about job substitution for pregnant and nursing female worker. Based on interview with paramedic, company has a program for medical examination every 2 month to identify the pregnant worker. Based on field observation in Senabah Division, there are no pregnant or nursing female worker. Company also has monitoring of female worker pregnancy. The identified pregnant female worker will be transferred to the job that not dealing with agrochemical.

Status: Comply

4.7

An occupational health and safety plan is documented, effectively communicated and implemented.

4.7.1

OHS policy unchanged from the previous assessment. Occupational Health and Safety Policy endorsed by Group Head Plantation on September 2010. Based on Mill visits, it is known that the OHS policy attached on the bulletin board in front of the security office.

The Company showed EHS Department Work Program on 2017 for estate and mill. Based on field visits and interviews with workers, it is known that the OHS program has been implemented, for example:

- Has provided PPE to workers in accordance with the risk identification
- There is a inspection form of emergency response equipment showed that the checks has been conducted every month.
- Conducting medical check-up to workers. The last check-up has been done on January 2017.

The effectiveness of health and safety plan has been monitored every month in the Regional Management Committee. For example, the meeting has been conducted on December 22, 2016 to discuss the plan and OHS reporting.

4.7.2

The company has had a risk identification contained in the document Analysis and Control Risks in OHS Implementing at PT ANI Sambas (No. Doc FRM 01/SOP 11/EHS/(0)/0411) which was reviewed on January 10, 2017. According to the document, it is known that the company has identified the risk of operational activity throughout the mill and estate. Based on the field visit at WTP, the provision of PPE to the operator such as Safety Shoes, nitrile gloves, helmet, ear plug and mask with carbon. This is in accordance with risk identification and MSDS of Aluminium Sulphate.

4.7.3

The Company show evidence of a safely work training, for example:

- Dissemination about Harvesting on July 20, 2016, to 14 workers of Sentama Lestari Smallholder
- Dissemination about Best Practices of Manuring on June 20, 2016 to Cempaka Biru Smallholder
- Dissemination about Best Practices of Manuring on January 14, 2016 to 7 workers of ANI Estate

Based on the field visit, it is known that the workers has used PPE in accordance with risk identification. For example in the harvesting activity at the ANI Estate, Cempaka Biru and Sentama Lestari Smallholders, the workers use the PPE with the type of helmet, boots, and cover of harvest equipment. Workers also explained that when the PPE is damaged can be replaced with report to the foreman and bring proof of defective PPE. Workers at high noise levels have been trained, for example training for 3 boiler operators and there are the licence too. Based on interview with workers engaged at high noise levels (boiler operator), they have been examined periodically especially for audiometry test.

Recordings of PPE distribution are recorded in the PPE inventory documents that documented for each type of goods. For example inventory of safety goggles are distributed on October 7, 2016 to 5 employees of ANI Estate phase 5 and on 11 November 2016 to 30 employees of Sentama Lestari Smallholder.

4.7.4

The person are responsible for the OHS implementation listed in P2K3 structure and has been established in accordance with the Labour Ministerial Regulation No. 04 on 1987. The P2K3 structure formed by each management unit (Mill and Estate). However P2K3 structure still in the renewal stage with documentary evidence is letter to Labour Agency at Sambas district on February 13, 2017 and the renewal of the Appointment Decree of OHS Expert for P2K3 Structure at the Estate (on behalf of Lidwina Yunda) to Labour Agency at West Kalimantan province on January 3, 2017. Based on interviews with the Labour Agency Sambas district, explained that the structure P2K3 of the company is still in the process of ratification. **OFI**

The Company show evidence of a meeting about OHS, for example:

- Factory: Minutes of P2K3 meeting on February 2, 2017 with the discussion related to the organizational structure of Emergency Responses Team on 2017, safety inspections and Matrix Training on 2017
- Estate & Smallholders: Minutes of P2K3 meeting on October 27, 2016 related to the discussion of Accidents, provision of PPE to employees, plan of dissemination about safety procedures.

Based on interviews with labor unions, explained that during the meeting related to OHS there are a representative of workers or supervisors who participated in the meeting.

4.7.5

SOP on emergency response and accidents are still the same as the previous assessment, for example:

- Emergency Response Procedures (SOP29/WIP-KB/(0)/2011) set about emergency response fire, leaks, accidents, explosions, natural disasters, disruption and pollution.
- Work Accident Reporting Procedures (SOP35/WIP-KB/(0)/2011)
- Accidents Investigation Procedure (SOP36/WIP-KB/(0)/2011)

Accidents Recording has been reported on the company's P2K3 reports every 3 months. The Company showed evidence of P2K3 report for the 4th Quarter (October-December 2016) for the Estate has been reported on January 9, 2017 and for the Estate has been reported on January 25, 2017. The monitoring of workplace accidents has been documented on Notification Form that describes chronological accident, the cause of accident until an improvement plan so that accidents do not happen again.

Based on interviews and field visits in the harvest, spray, workshops and hazardous waste Storage, it is known there is first aid box and also has evidence of examination that recorded in Form of Medicines Monitoring are conducted once a month and on every supervisor has been equipped with first aid bag. All supervisor explained that has been given the training about use of first aid equipment and can explain the function of each equipment.

4.7.6

Company has provide medical care for worker including daily worker. Medical care is covered by worker and health insurance (BPJS). The payment for BPJS is conducted every month according to the available rule. Besides, company also provide medical facilities for workers if work accident is occurred. Work accident will be reported to the BPJS Agency and claim for it will be done if the medical process has been completed. Based on interview with worker in estate and mill, it is known that both worker and their family is have been registered in health insurance (BPJS Kesehatan).

4.7.7

Company always records the work accident by calculating the lost time accident. This calculation is attached in Committee of Occupational Health and Safety Report. It explain the number of accident, accident less than 2 days and more than 2 days, total of work hours, frequency rate, severity rate, and lost time incident rate. Each unit, Estate and Mill has made this calculation.

Status: Comply

4.8

All staff, workers, smallholders and contractors are appropriately trained.

4.8.1

Company has training program for workers for period of 2017 for operational training and socialization of procedure and company policy. Some of training program, namely:

- Harvesting will be held in October 2017
- Manuring will be held in January and October 2017
- Operator license will be held in May 2017.
- Emergency response will be held September 2017
- Fire fighting will be held in June 2017

Based on interview with worker in estate and mill, they have received some training related to their work, such as harvesting best practice, training for manuring, slashing, and spraying, first aid training. The training has been documented into minutes of meeting, list of attendees, and photo activity.

4.8.2

Company has showed the documentation of training whether it is internal or external training. For example, training for security which conducted on 26th September 2016, attended by security from ANIS Estate and ANIS POM. For external training, the company kept the certificate of each employee. All the training documentation is kept in worker personal file.

Status: Comply

PRINCIPLE #5 Environmental responsibility and conservation of natural resources and biodiversity
5.1

Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continuous improvement.

5.1.1

The Company has a document on Environment Impact Assessment (EIA) approved by the EIA Commission, on behalf of Minister of Forestry No. 635 / Menhut-II / 2001 dated May 1/2001. In the EIA obtained information:

- EIA area of 15,000 ha and Mill Capacity 60 t FFB / Hour.
- The scope of activities of the EIA is plantation and palm oil mill, including the development of infrastructure includes roads, bridges, drainage / ditch, waste management, conservation of soil, water, air and wildlife, and control of plant pests and diseases. The company has an opportunity to conduct a study analysis of environmental and social impact on the activities of replanting. **OFI No. 5.**
- Types of impacts that must be managed and monitored, is the rate of erosion, water quality, fire potential land, flora and fauna, employment, partnership schemes and public health.

5.1.2

The company has implemented environmental management period July to December 2016 in accordance with *Matrix of RKL*, for example: planting trees, manage waste water in WWTP; do not perform chemical application on the riparian border; signboard installation of RTE species; provide job information; medical check-ups, etc.

5.1.3

The Company has conducted environmental monitoring in accordance with the *Matrix of RPL* period July to December 2016, for example: waste water quality test, water quality test, observation of endangered species, monitoring of local labor and so on. Implementation report of RKL / RPL are then reported to the local government.

	Status: Comply	
5.2	The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced	
5.2.1		
	<p>The Company through cooperation with MEC Malaysia has identified High Conservation Value (HCV) Assessment, March 2011 with a total area of 453.45 hectares. Based on statement No. 004 / ANI-SBS / VI / 2012, known HCV in <i>Kadasral</i> area of 94.01 hectares (43.96 ha on planted area and 50.05 ha on HCV area). List of flora and fauna have been described in the document HCV.</p> <p>The company also has identified species of flora and fauna in PT Ani Sambas in March 2014 by the Wilmar. There is one bird species status Least Concern by the IUCN, 2 bird species under CITES Appendix II status, and 12 species of birds protected status under PP 7/1999. There are 8 types of mammals status Least Concern by the IUCN, two types of status Vulnerable by the IUCN, 4 types of status Appendix II under CITES, and 2 species of protected status by the PP. No. 7/1999. There are 7 types Amphibian and Reptile status Least Concern by the IUCN, 3 types of status under CITES Appendix II, and there are no protected species under PP 7/1999.</p>	
5.2.2		
	<p>The company has conducted protection of HCV & Species RTE in accordance with procedures, such as socialization to employees and the surrounding village communities; installation boundary markers of chemical application on riparian; HCV signboard installation and planting trees on the riparian (<i>Based on field observation in Sentakul riparian Block plasma 903, Sentakul riparian Block 144E Senabah Estate, Maknyiri riparian Block 30C, Anas riparian Block 971 A / B, Senapit riparian Block 081 A / C</i>).</p> <p>The Company has conducted monitoring of HCV and RTE species once six months, the last monitoring was done on January 16/2017 by HCV Officer and Tim. Based on monitoring results cannot be found to capture the activity, preserve or killing animals. Recommendations of the results of monitoring same have been implemented by the company, for example planting trees and installing boundary markers chemical applications. But the company has an opportunity to ensure that all recommendations riparian monitoring period of January 2017 be implemented, for example installing boundary markers chemical applications missing. OFI No. 2</p>	
5.2.3		
	<p>The Company has conducted socialization HCV and RTE species to the workers and the surrounding villages (sighted: the attendance list socialization Feb 04, 2016 January 13, 2016, June 20, 2016, and June 23, 2016).</p>	
5.2.4		
	<p>Monitoring HCV and RTE species carried out once every 6 months, the last monitoring was done on January 16/2017 by HCV Officer and Team. Implementation and monitoring of HCV and species RTE are based on previous monitoring.</p>	
5.2.5		
	<p>Based on documents study and interviews with local communities obtained the information that there are no local public lands within the boundaries of the company's operations.</p>	
	Status: Comply	
5.3		
	Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.	
5.3.1		
	<p>The company has had a list of waste products, such as ex pesticide containers, used oil, filters scrap, battery scrap, medical waste, domestic waste, EFB, shell, fiber, waste water treatment plants, etc. The waste products are sourced from estate activities, housing activities, mechanics in the workshop activities, and palm oil processing factory activities</p>	
5.3.2		
	<p>List of chemical waste products, among others ex pesticide containers. Ex pesticide containers from Senabah and Kumpai Division stored hazardous waste storage approved by relevant government located in Division Kumpai, then handed over to the licensed collecting LB3 (PT Mitra Karya Surya Kencana), after that was reported to the local government periodically.</p>	

Sighted: neraca LB3 triwulan IV; record LB3 triwulan IV; receipt submission LB3 to PT Mitra Karya Surya Kencana dated November, 24/2017; ex pesticide containers manifest No. AHK 0000329 covered 0.449 ton; truk number KB 9611 SA; receipt LB3 report to local government dated Jan, 10/2017.

The company has the opportunity to document the use of ex pesticide containers in the balance sheet and monthly record LB3, other than in the Bin Card as has been done. **OFI No. 2**

5.3.3

The Company has conducted in accordance with the waste management plan, it can be seen from the field observation and interviews, as follows:

- Based on field observation on the housing estate and mill, known domestic waste is collected in the available bins and then disposed to landfill area (TPAS).
- Based on field observation on the clinic, known clinical waste is collected in a special place and handed over to Hospital in Sambas to be destroyed.
- Based on field observation on Mill, known that the fibers and shell is used as fuel to reduce fossil fuel consumption and maximize renewable energy.
- Based on field observation, known condition of WWTP pond well maintained, there are no leaks, condition of flow meter well maintained.
- Based on field observation, known hazardous waste stored on the hazardous waste storage licensed

According to interviews with local community and field observation known that EFB is not burned.

Status: Comply

5.4

Efficiency of fossil fuel use and the use of renewable energy is optimised.

Based on field observation in POM, the fibers and shell used as fuel to reduce fossil fuel consumption and maximize renewable energy. Efficiency of use of renewable energy for PT ANI Sambas period from June to December 2016 of 0.063 KWh / t FFB; and diesel use of 1.95 liters / t FFB. Boiler operator wearing PPE while working.

Status: Comply

5.5

Use of fire for waste disposal and for preparing land for replanting is avoided except in specific situations, as identified in the ASEAN guidelines or other regional best practice.

5.5.1 & 5.5.2

Based on field observation in PT.ANI and smallholders area, there is known the company does not doing land clearing or replanting activities.

In addition, the company has the Environmental Management Policy and Handbook of Agronomic and Oil Palm Procedure on 2015 which explained that the land clearing activities must implemented with zero burning system

Status: Comply

5.6

Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.

5.6.1 & 5.6.2

The Company has recorded all the activities of pollution and GHG emissions. Sources of pollution and emissions of activities such as fertilizers activities, pesticides activities, transportation activities, generator activities, boiler activities, and waste water treatment activities.

The Company has implemented GHG mitigation in accordance with the plan, among other things: no land clearing after 2005, fertilizers use in accordance with the recommendation of leaves and soil analysis, applying the concept of IPM, repair the machine regularly, utilization of renewable energy and air quality test regularly, waste water treatment on the IPAL and waste water treatment plants test regularly.

5.6.3

The Company has conducted smoke emissions test including noise level in the Boiler and Generator Mill period from July to December 2016, which is performed at an accredited institutions (Laboratory of Kesehatan, Kalimantan Barat Province). The company too conducted noise level on front office, loading ramp and housing complex periode July to Desember 2016. The test results are in accordance with national regulation. The test results periodically sent to the local government. Ani Sambas POM and estate suppliers (Senabah estate, Kumpai estate, Sentama Lestari and Cemapka Biru smallholders) has calculated GHG emissions period 2016 using the RSPO PalmGHG calculator.

Emission per product	tCO2e/t Product
CPO	7.5
PK	7.5

Production	t/year
FFB processed	128819.611
CPO produced	23902.651
PK produced	5254.853

Extraction	%
OER	18.56
KER	4.08

Land use	Ha
Planted area	9047.49
Planted on peat	3336.9754
Conservation ANI Sambas Inti (forested)	0
Conservation ANI Sambas Inti (non- forested)	51.44
Conservation ANI Sambas Plasma (forested)	0
Conservation ANI Sambas Plasma (non forested)	0

Summary of field emission and Sinks

	Own crop		Group		3 rd party	
	tCO2e	tCO2e/t FFB	tCO2e	tCO2e/t FFB	tCO2e	tCO2e/t FFB
Emissions						
Land conversion	49490.9	0.44	10650.8	0.86	0	0
CO2 emissions from fertilizer	5122.02	0.05	273.25	0.02	0	0
NO2 emissions	19510.33	0.17	6881.59	0.56	0	0
Fuel consumption	1663.49	0.01	37.41	0	0	0
Peat oxidation	105516.98	0.93	48282.82	3.9	0	0
Sinks						
Crop sequestration	-55941.68	-0.49	-14008.67	-1.13	0	0
Sequestration in Conservation area	0	0	0	0	0	0

Total	125362	1.11	52117.2	14129.36	0	0
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	Status: Comply	
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PRINCIPLE #6 Responsible consideration of employees and of individuals and communities affected by growers and mills

6.1

Aspects of plantation and mill management, including replanting, that have social impacts are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate the continuous improvement.

6.1.1

The company has document of Social Impact Assessment Report for scope of Plantations & Palm Oil Mill. The assessment process carried out in March 2011 by the Indonesian Resource Institute. The document describes the social impact management of gardens and factories, among others: employment, health and safety, facilities and benefits of workers, consultancy and communication, stability of employment, business opportunities, revenues, income household, institutional, perception at the company, socio-cultural changes, health workers and the public, and tenure. The process of data collection is done through discussions with the parties, the employee and community. The results of these discussions are described in the form of Minutes of the results of the discussion. Evidence in the form of recordings Participant List Discussions at the time of collection of information. The parties that are involved, among others, employees and the communities surrounding villages (Semanga, Beringin and Sepantai) was attached to the report. In August 2016 Review of Monitoring Plan Social impact PT Agronusa Investama was conducted. Theese document was contains descriptions among others; Sources of impact, parameters measured, Monitoring Objectives, Methods Data collection and analysis, monitoring locations, the Executive and the results of the review.

Based on interview with the villagers, There is no issue related to the negative impact on the enviroentment caused by the management of estate and mill in PT. Agronusa Investama. Also ther is no conflict in the land management that occurs between the communities with the company.

6.1.2

There was shown an evidence of record meeting with the parties during the discussion (consultation), in the form of Key Issues List (Results Stakeholder Consultation with Employees of the Company and the Public Interest). Recording summarizing the results of discussions during the field data collection

6.1.3

It has been shown recorded evidence include:

- Documents Report of RKL / RPL Semester 2 year of 2016. In the document has been explained about the social impacts are monitored and managed, among others: community fidgetiness & Employment.
- Summary of the implementation of the collection of information for planning and managing social impact monitoring.
- The presence or absence of the parties, consist of; representatives of the local community, the village government and community leaders

6.1.4

It has been shown evidence of record, consist of:

- Document Review of Plan for Monitoring the Social Impact of PT Agronusa Investama year of 2016, contains a description of; Sources of impact, parameters measured, Objective Monitoring, Data Collection and Analysis Methods, Location Monitoring, Implementation and results of the review
- Minutes of the implementation of the FGD among employees of PT ANI Sambas with stakeholders (community and around the Village Government), dated 9 to August 11, 2016), participatory discussion regarding the impact of Social Monitoring Plan Review of PT Agronusa Investama year of 2016
- Attendance List of Participants
- Photographs of Focus Group Discussion process

6.1.5

The Company has conducted several activities for farmers, among others; guidance to the farmers in the management of oil palm plantations and management of cooperatives.

Status: Comply

6.2

There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.

6.2.1

Company has the mechanism for communication which is written in Procedure For The Implementation Mechanism of Communication And Consultation With The Community And The Appointment of Officers for Consultation And Communication No. SOP 03/WIP-KB/ (1) /0911. The objective of this procedure is to make consultation easier for local communities. Besides, it is stated that company will coordinated with local community to make the meeting schedule with the community in order to open the lines of communication and consultation. Delivering the company's policy to the public and discussions together in order to keep the interest of both parties. Based on consultation with related stakeholder, they already know the mechanism for communication and consultation with the company.

6.2.2

Company has appointed Bina Mitra department as in charge for communication and consultation with stakeholder. The duties and responsibility of Bina Mitra Department is written on "Authority, Duties, and Responsibility of Bina Mitra Organization". In that document stated that Bina Mitra has communication and public relation function, as well as the company presence and existence is accepted by the community.

6.2.3

Company has the newest list of stakeholder, consist of statutory bodies, leader community, smallholders, contractors, worker organizations, and NGOs. The communication is documented and kept by the company. Based on interview with stakeholders, is known that they already know about the mechanism of communication and consultation. Moreover, company responds to all incoming letter quickly or not later than 14 days after the letter was received

Status: Comply

6.3

There is a mutually agreed and documented system for dealing with complaints and grievances, which is Implemented and accepted by all affected parties.

6.3.1

The company has procedure to handling of Grievance/Complaint (SOP 60/WIP-KB/(0)0915, effective since 1 September 2015) and also has system for dealing the dispute and complaints receive. This system was refer to Wilmar Group Policy (Version 3, No. 042/DIR-KP/VIII/2015, dated 5 August 2016, The policy was contained of Form of Complaint Data Handling. These document was explained on point 4. Objectives and Policy in Sub point 4.1 was explained that this policy aims to provide assurance to the complainant who already have a good willing to report of alleged abuse or practice of divergence. The complainant will be protected against retaliation or actions that could harm the complainant. Furthermore in point 7 related to **Confidentiality**, there was explained that the Company encourages the complainant to write clear and complete identity at the time reported the deviations that occur. All forms of reporting irregularities will be

guaranteed confidentiality by the company. If the complaints cannot be resolved by consultations, it can follow up to next step or through process to RSPO.

6.3.2

Based on the verification of incoming letter documents and information from the parties when the internal stakeholder consultation (Gender Committee and workers representatives, consultation with relevant agencies in the District Sambas and Stakeholder Consultation with head of village & community representative from Beringin dan Semanga Village), there was no information about the complaints of the parties. The document of Complaint List was showed that any aspiration from the workers related to company facilities, for examples aspiration related to damage part of home facilities. The management unit of PT Agronusa Investama was follow up with maintenance the part of home facilities

Status: Comply

6.4

Any negotiations concerning compensation for loss of legal or customary rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.

6.4.1 & 6.4.2

The company has the procedures of identification, calculations and Compensation in the form of SOP of Soil / Land Acquisition Technical Guide (SOP 05/WIP-KB/(0)/0312, March 2012. Has been shown the examples of record evidence in the process of land acquisition in the form of Agreement Minutes between PT Agronusa Investama with landowners witnessed by the parties, among others: Sub District Head and Village Chief). Also available evidences of Land Submission Letter from each owner / land tenants to PT Agronusa Investama.

Based on the procedures of identification, calculations and Compensation in the form of SOP of Soil / Land Acquisition Technical guidelines (SOP 05/WIP-KB/(0)/0312, March 2012, which has been owned by the company, in the past has been made the granting of compensation process for land compensation. It has been shown the evidence of implementation of the existing procedures, namely through the granting of compensation records (land compensation).

The company has been filed the resolution processes of land compensation in the past. There was shown an example of Statement letter of Land Release Agreement which entered the administration area of Satai Hutment, Sepantai Village of Sejangkung District on September 22, 2008. The land area of \pm 170 hectares in the measuring image of Land Use Title Plans in PT Agronusa Investama are administratively in the region of Satai Hutment, Sepantai Village with the limits: North (Measuring image of Land Use Title Plans); Western (State Land of Satai Hutment Region); East (State Land of Satai Hutment Region); South (Measuring image of Land Use Title plan).

6.4.3

The company was documented all of land compensation process. The documentation comprise of Map, Negotiation result (minutes of meeting), Land Release Letter, Payment Receive was filled in estate office based on land location. Based on Procedure Implementation Mechanism Communication and Consultation With Community SOP 52/WIP-KB/(1) 0911. The documentation of land compensation process are limited access and should approved by Document & Legal Department and Manager of Estate if any related parties will access this document. Theses document can access with letter of Information Request from another parties to the company.

Based on Stakeholder Consultation with head of village & community representative from Beringin dan Semanga Village) it is known that some time ago, there are no longer processes of land compensation taken by the company. It has been done in the early days.

Status: Comply

6.5

Pay and conditions for employees and for employees of contractors always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.

6.5.1

Company has work agreement for permanent worker and temporary daily worker which explain about the wages, work hour, duty and responsibility, and other provisions. The wages is in accordance with West Kalimantan Governor Decree No 77/Disnakertrans/2016 about minimum wage and sectorial minium wage for Sambas Regency as much as Rp 2.095.000 per month. Besides, the company also have wage mechanism for harvester which is the crop prices is based on the planting year and the harvester will get incentive if they have achieved more than the target. Based on interview with worker in estate, they received payslip document. Based on interview with mill workers (boiler operator and grading operator), the overtime wages is paid according to the overtime hours.

6.5.2	There is work agreement between company and the worker which explain about the wages, work hour, duty and responsibility, and other provisions.	
	Status: Comply	
6.6	The employer respects the right of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.	
6.6.1	There is company's policy related to opportunity for the employee to join the labor union on Internal Memorandum from HRD Head Wilmar International Plantation No. 026/WIP-HRD/Int-VIII/2009. Company facilitates the establishment of labor union (SPSI) to deliver the information from the workers to company and vice versa. The labor union has been registered to Labor Agency of Sambas Regency with registration number is 560/14/STKT-C/2014 dated 7 th May 2014. Based on interview with the worker in ANI Estate, there is no force for the worker to join the labor union.	
6.6.2	The labor union conducted meeting periodically or where there is an issue with company or the member of union. There are meeting documentation, such as minutes of meeting on 13 th February 2017, attended by 6 participants. The documentation is available in office unit and available for member if they were asking.	
	Status: Comply	
6.7	Children are not employed or exploited.	
6.7.1	Company has Intern Memorandum No 026/WIP-HRD/INT-VIII/2009 about Employee which explain that the company don't recruit worker below 18 years old. Based on document review and field observation, there are no workers under 18 years old. Based on public consultation with Manpower Agency of Kampar District and field observation, there is no issue regarding child labor. Based on interview with worker in estate, they know the minimum age to work in the company. Based on field observation in estate, auditors did not sighted any harvester accompanied by their wife or children.	
	Status: Comply	
6.8	Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.	
6.8.1 & 6.8.2	Company has policy regarding anti discrimination that written on Policy of Equal Opportunity revised on September 2010, signed by Group Plantation Head and Group CSR Head. In the policy is stated that there is no discrimination based on ethnic, religion, disability, gender, sexual orientation, age, and beliefs. This policy is located in each unit and can be accessed publicly. Based on field observation and interview with female worker in day care, it is known that there is no issue or complain from worker regarding discrimination. The workers that has been interviewed is came from various social origin, race, and religion.	
6.8.3	Company kept the personal file of each worker in PGA Department. Based on interview with management, the recruitment is conducted through the company requirement. Worker promotion, mutation or demotion is done through the employee performance assessment. Company showed documentation of employee performance assessment, it explain about the verification of evaluation indicator whether the worker will be promoted or demoted.	
	Status: Comply	
6.9	There is no harassment or abuse in the work place, and reproductive rights are protected.	
6.9.1, 6.9.2, 6.9.3	Company has the procedure about Handling of Sexual Harassment Complaints No SOP 46/WIP-KB (HRD)/(0)/2011. It explains how to make a complaint if there are indications of sexual harassment in the workplace. The procedure has been socialized to the workers on 22 nd and 23 rd March 2016 attended by 103 participants. Based on interview with female	

workers in Estate, they understood about the complaint mechanism. It is also known that there is no issue or complaint related to sexual harassment on the workplace. Company also form gender committee for handling the harassment issue around female workers. Based on interview with the board of gender committee, the company provides the female worker with pregnant and nursing leave for about 3 months.

Company also has procedure of grievance or complaint No. SOP 60/WIP-KB/(0)/0915 which explain that the identity of the complainant is not revealed to everyone. Based on interview with the worker, they understand the complaint mechanism and there is no complaint from them.

Status: Comply

6.10

Growers and mills deal fairly and transparently with smallholders and other local businesses.

6.10.1 & 6.10.2

Related to smallholder was associated with the company, the FFB price based on the price monthly price was approved by Plantation Agency of West Kalimantan Province. These price was issued from discussions with the parties (Farmers' Cooperative, Planters and Related Agencies). As for TBS from the outside (suppliers who are not associated directly with the nucleus), pricing is based on the Standard Procedure for the determination of price TBS / Purchasing Procedures TBS, where the price of FFB from outside will be purchased in accordance with the criteria that have been described to the suppliers and have them agree and agreements set forth in the form of Letter of Employment Agreement (SPK). FFB price was archived in the office ANI Sambas Mill and also posted on the information board at the front side of the factory area (the Postal Security).

6.10.3

It was shown an examples of Cooperation Agreements Purchase of fresh fruit bunches (FFB) of oil palm, No. 001 / SPK-ANI Senabah / PB-TBS / I2017, dated January 2, 2017 between Latif Muhlid (The Plantation Owner that acts as a FFB Supplier - First Party) with Eddysan (on behalf of Board of Directors of PT Agronusa Investama - Second Party). It has been shown examples of the Cooperation Agreement between PT Agronusa Investama with CV Pulau Indah in the Context of Development Work/Making Fences Elementary School (No. 77/ANI-SPK / Building-Fence of elementary school / VI-2016, dated June 27, 2016). Based on interview with the local contractor, Before signing the Cooperation Agreements, the companies explain the clauses of the agreement, and the rights and obligations of each party. Letter of Employment Agreement will be revised in accordance with the conditions, such as freight price adjustments to operational costs (fuel prices).

6.10.4

There was shown sample proof of payment records on 16 January 2017 from PT Agronusa Investamato local contractor Latif Muhlid (FFB Supplier) to ANI Sambas POM. Based interview with the local contractor that knows the payment process was routinely as clause in contract and there was no problem related to consistency time of payment in every month.

Status: Comply

6.11

Growers and millers contribute to local sustainable development wherever appropriate.

6.11.1

The contribution to local development is documented in the program of Corporate Social Responsibility for year 2017. Based on document review, the local development is conducted in every aspects, such as infrastructure, environment, economic, health, education, and preservation of customs and culture, as example the development of Elementary school di Senabah Village. Moreover, company has been consulting to the village related to SIA document review which discuss about social monitoring and management plan. The local development is include in the plan. Company has been planning to conduct identification in determining the local development needs. (OFI)

6.11.2

Company has full manage smallholders (Sentama Lestari and Cempaka Biru) with total area as much as 1,330.77 Ha. Smallholder operational activity is done by worker from the company To increase the productivity of smallholder, the company has conducted training to the smallholder worker related to best management practice in harvesting, manuring, and spraying. The company has showed the training documentation, such as Best Practice Spraying Training on 15th January 2016.

	Status: Comply	
6.12		
No forms of forced or trafficked labour are used.		
6.12.1; 6.12.2; 6.12.3		
Based on document review, field observation, and interviews with worker and stakeholders, it is known that there is no migrant labor, including forced labor and illegal labor. The recruitment is done according to the company's procedure. All workers have work agreement that explain about the obligation and rights of the worker, and other provision. They work based on the contract and work order. Based on field observation and interviews with the workers in Estate and Mill, it is known that there is no discrimination among them. They came from local and nonlocal worker. Based on field observation in estate, auditors did not sighted any harvester accompanied by their wife or children. Based on interview with worker union member, there is no issue related to force labour.		
	Status: Comply	
6.13		
Growers and millers respect human rights		
6.13.1		
The company has policy on human rights which explain the kind of human rights for all workers. The policy has been socialized to the workers, as example to the smallholder worker of Sentama Lestari on 22 nd March 2016 attended by 29 participants. Based on field observation and interview with worker and internal stakeholder (board of labor union and gender committee), it is known that there is no complaint related to human rights violation. If there is a complaint, the complaint can still be resolved by amicable way between employees. The workers also aware about the policy.		
	Status: Comply	
PRINCIPLE #7 Responsible development of new plantings		
7.1		
A comprehensive and participatory independent social and environmental assessment is undertaken prior to establishing new plantings or operations, or expanding existing ones, and the results incorporated into planning, management and operations.		
7.1.1		
Until ASA-4 there was no new development or new land clearing and replanting carried out by PT Agronusa Investama. Environment analysis document can be seen in Indicator 5.1.1		
7.1.2; 7.1.3		
Until ASA-4 there was no new development or new land clearing and replanting carried out by PT Agronusa Investama. Management and environmental monitoring that has been done by the company can be seen in Indicator 5.1.2 and 5.1.3		
	Status: Comply	
7.2		
Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.		
7.2.1 & 7.2.2		
Until ASA-4 there was no new development or new land clearing and replanting carried out by PT Agronusa Investama.		
	Status: Comply	
7.3		
New plantings since November 2005, have not replaced primary forest or any area required to maintain or enhance one or more High Conservation Values.		
7.3.1; 7.3.2; 7.3.3		
Until ASA-4 there was no new development or new land clearing and replanting carried out by PT Agronusa Investama. To ensure that no new plantings in primary forest or HCV area, the company has shown evidence of Liability Disclosure and Land Use Change Analysis (LUCA) has been sent to the RSPO Compensation Panel (rspocompensation@rspo.org) dated April 8/2015. Until ASA-04 activities, the RSPO is still verifying the reports related to disclosure and compensation liability which has been submitted (Observation).		
	Status: Comply with Observation	
7.4		
Extensive planting on steep terrain, and/or on marginal and fragile soils, is avoided.		

7.4.1 & 7.4.2	
Until ASA-4 there was no new development or new land clearing and replanting carried out by PT Agronusa Investama.	
	Status: Comply
7.5	
No new plantings are established on local peoples' land without their free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.	
Until ASA-4 there was no new development or new land clearing and replanting carried out by PT Agronusa Investama.	
	Status: Comply
7.6	
Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their free, prior and informed consent and negotiated agreements.	
Until ASA-4 there was no new development or new land clearing and replanting carried out by PT Agronusa Investama.	
	Status: Comply
7.7	
Use of fire in the preparation of new plantings is avoided other than in specific situations, as identified in the ASEAN guidelines or other regional best practice.	
7.7.1 & 7.7.2	
Until ASA-4 there was no new development or new land clearing and replanting carried out by PT Agronusa Investama.	
	Status: Comply
7.8	
New plantation developments are designed to minimise net greenhouse gas emissions.	
7.8.1; 7.8.2	
Until ASA-4 there was no new development or new land clearing and replanting carried out by PT Agronusa Investama..	
Calculation of GHG emissions can be seen in Indicator 5.6.3	
	Status: Comply
PRINCIPLE #8 Commitment to continuous improvement in key areas of activity	
8.1	
Growers and millers regularly monitor and review their activities and develop and implement action plans that allow demonstrable continuous improvement in key operations.	
<u>Pesticide Reduce</u>	
The company has been implemented a strategy of reduced use of pesticides by implementing IPM activities, among others:	
<ul style="list-style-type: none"> • Conducting regular census to determine the level of pest/disease attack. Application of pesticides used when the attack rate has exceeded the economic threshold. • Conducting pest/diseases handling by biological ways, for example, the use of owls (<i>Tyto alba</i>) to control rat and planting the beneficial plant with a type of <i>Turnera Sp.</i> and <i>Casia Sp.</i> 	
<u>Social Impact</u>	
The Social Impact Studies have been conducted in 2010, the company has also conducted a review of planning. It has been shown Document of Review Plan for Social Impact monitoring PT Agronusa Investama year of 2016, These document was contains description of Sources of impact, parameters measured, Monitoring Objectives, Methods of Data collection and analysis, monitoring locations, the Personnel in Charge (PIC) and the results of the review.	
<u>Environment</u>	
The company has conducted continuous improvement action on environmental aspect, for example waste water quality test periodically, water quality test periodically, observation of endangered species periodically, and stored hazardous waste storage approved by local government. The test results periodically sent to the local government	

Status: Comply	
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3.2 Summary of Assessment Report of Supply Chain Requirements

Clause	(Module E) CPO Mills - Mass Balance Requirements
E.1	Definition
E.1.1	<p>Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and volume sales of RSPO certified producers. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p> <p>PT Agronusa Investama POM has owned procedures documented for accepting and Processing certified and non-certified FFB. Mechanism for verifying the incoming FFB, described in several procedures, among others:</p> <ol style="list-style-type: none"> SOP of FFB Receive (SOP 02/SRT-ANI/(02)/0213 (Rev 02) effective since 20 February 2014 and SOP of FFB Receive from outside (001/TBS-SOP/VIII/2015, effective since 10 August 2015 SOP of Mass Balance No. 12/ADM-ANI/(01)0214 (Rev. 01) effective since 01 March 2014 which contains explanations: <ul style="list-style-type: none"> Incoming FFB process, including through the data input of nucleus and outer FFB acceptance (outsider) with Sustainable FFB status (certified) and Non Sustainable FFB (non-certified) in the appropriate columns. FFB data input process to be a Production Supervisor reports and reports of CPO / PK generated from sounding reports to determine the OER / KER and physical stock of CPO / PK in the appropriate columns. Data input for shipments of CPO / PK from the mill process according to its status (Sustainable or Non-Sustainable Sustainable CPO / PK) in the appropriate columns. <ul style="list-style-type: none"> Receiving and checking the DO status from Trading Head Office (Request of CSPO or non CSPO). Based on the status of DO Request and the conditions of stock balance, determine the delivery types of CPO / PPK to be performed. Fill the number for CPO / PK shipments according to the number and its status within the dispatch table and update the stock balance conditions based on the comparison of incoming and dispatch. SOP of CPO and PK products traceability (SOP11/ADM-ANI/(01)/0314, Rev 01) / 0314), the effective date on March 1, 2014 explaining that the facility to process the FFB into CPO and PK from certified and non-certified sources simultaneously (mixed), but in the administration / reporting stock by using separation between Mass Balance or separated between the stock of certified and non-certified CPO / PK. (SOP11/ADM-ANI/(01)/0314, Rev 01), effective since 1 March 2014 <p>There has been showed FFB received from certified source (RSPO Certified) and non certified. For example Delivery Order Letter and Fruit Weigh Tickets 20 February 2017:</p> <p><u>RSPO Certified Product</u></p> <ul style="list-style-type: none"> Delivery Order Letter from Senabah Division, (Phase 01), Vehicle No. KB 9070 AG, driver name Bendri, Weight 165 Kg + Loose fruits, Totally 8,924 Kg (estate weight). Weight Bridge Ticket from Senabah Division, (Phase 01), Vehicle No. KB 9070 AG G, driver name Bendri, Total weight 8,924 Kg (estate weight). Delivery Order Letter from Sentama Lestari Smallholder, Vehicle No KB 9835 PE, driver name Khodirun 6,775 Kg (estate weight).

Weigh Bridge Ticket from Sentama Lestari Smallholder, Vehicle No KB 9835 PE, driver name Khodirun Total weight 5,567 kg

- Delivery Order Letter from Cempaka Biru Smallholder, Vehicle No. H 1588 JY, driver name Egan Total weight 6,163 Kg (estate weight).

Weight Bridge Ticket from Cempaka Biru Smallholder, Vehicle No H 1588 JY, driver name Egan Total weight 6,470

There was also showed the attachment of grading form in grading area related to each Weight bridge Ticket

Non Certified Product (outsider supplier)

- Delivery Order Letter from Latif Muhlid: No: ADSB009504, Vehicle No KB 9161 E, Driver name Ferdi, Total weight 5,350 Kg and Weight Bridge Ticket

Status: Comply

E.2 Explanation

E.2.1

The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the CB in the public summary of the P&C certification report. This figure represents the total volume of certified palm oil product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced should then be recorded in each subsequent annual surveillance report.

CPO and PK data produced by Agronusa Investama POM in the period of April 22, 2016 until the implementation of ASA 04 (February 20, 2017) and estimated claims of Palm Products to be certified described in the table below:

Products	Actual of Certified Product Period 22 April 2016 to 20 February 2017 (ton/year)	Estimate Certified Product Period 22 April 2017- 21 April 2018 (ton/year)
CPO	21,895	32,632
PK	5,005	6,526

There data also described in the basic information.

Status: Comply

E.2.2

The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).

Agronusa Investama POM - PT Agronusa Investama (Wilmar International Limited) has registered for RSPO-certified products which are CSPO and CSPK through RSPO IT Platform, member registration number: **RSPO_PO10000002130**.

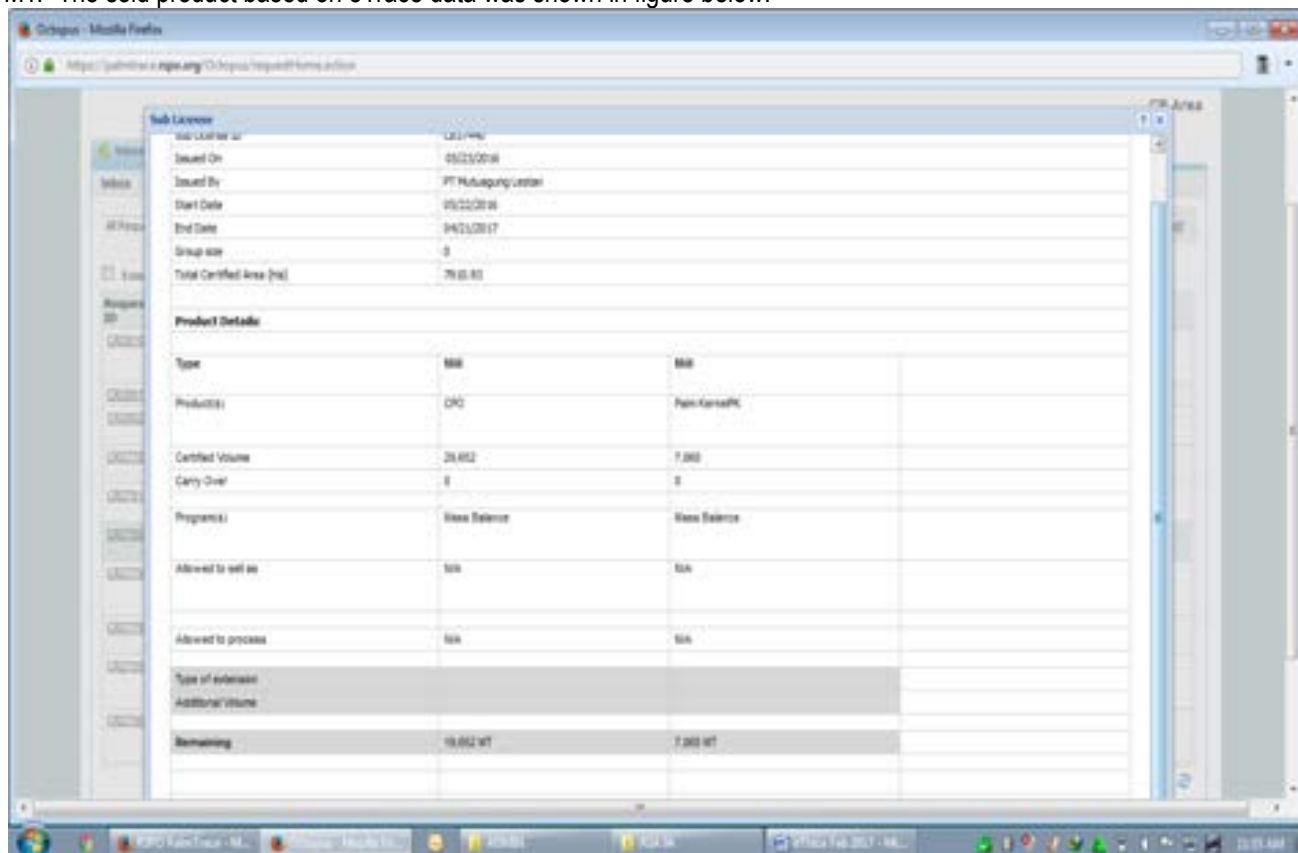
From the document verification and explanations by Mill Manager of Agronusa Investama POM and Mill Supervisor from the Regional Office of Pontianak, obtained information that during the period of April 22, 2016 until the implementation of ASA 04 (February 2017) there is any sold of RSPO Certified products for CPO and there was no for PK. There CPO sold out was transaction via book and claim. The data of certified product of CPO was transaction describe in table below

Date	Buyer	Volume (MT)
18 Feb 2017	Magnakron Corporation	80
18 Feb 2017	Olmega SA	107
18 Feb 2017	Greenspeed	30
18 Feb 2017	Mantinga	25
Total		242

Based information from Supervisor from the Regional Office of Pontianak was informed that the amount of certified product of CPO 9,758 MT still noted in book and claim. Refer to data from eTrace system that know any transaction of sold out product for CPO only, the number of transaction was 10,000 MT.

Based on the checking of Product Details in the program E-trace for PT Agronusa Investama, it is known that the Certified volume of CPO sold can be claimed for the period from April 22, 2016 till April 21, 2017 that CPO: 29,652 MT and PK: 7,060

MT. The sold product based on eTrace data was shown in figure below:



Sub License	
Sub License ID	123456
Issued On	05/11/2016
Issued By	PT Mutuagung Lestari
Start Date	05/11/2016
End Date	04/11/2017
Group size	0
Total Certified Area (ha)	70.00

Product Details	
Type	MT
Product	CPO
Certified Volume	26,652
Carry Over	0
Programs	Mass Balance
Allowed to sell as	MT
Allowed to process	MT
Type of extension	
Additional volume	
Remaining	18,652 MT

Status: Comply

E.3 Documented procedures

E.3.1

The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:

- Complete and up to date procedures covering the implementation of all the elements in these requirements;
- The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site procedures for the implementation of this standard.

Agronusa Investama POM has owned procedures and / or written work instructions to ensure the implementation of all elements in terms of supply chain. The procedures are consists of:

- SOP of FFB Receive (SOP 02/SRT-ANI/(02)/0213 (Rev 02) effective since 20 February 2014 and SOP of FFB Receive from outside (001/TBS-SOP/VIII/2015, effective since 10 August 2015
- SOP of Mass Balance No. 12/ADM-ANI/(01)0214 (Rev. 01) effective since 01 March 2014 which contains explanations:
 - Incoming FFB process, including through the data input of nucleus and outer FFB acceptance (outsider) with Sustainable FFB status (certified) and Non Sustainable FFB (non-certified) in the appropriate columns.
 - FFB data input process to be a Production Supervisor reports and reports of CPO / PK generated from sounding reports to determine the OER / KER and physical stock of CPO / PK in the appropriate columns.
 - Data input for shipments of CPO / PK from the mill process according to its status (Sustainable or Non-Sustainable Sustainable CPO / PK) in the appropriate columns.
 - Receiving and checking the DO status from Trading Head Office (Request of CSPO or non CSPO).
 - Based on the status of DO Request and the conditions of stock balance, determine the delivery types of CPO / PPK to be performed.
 - Fill the number for CPO / PK shipments according to the number and its status within the dispatch table and update the stock balance conditions based on the comparison of incoming and dispatch.

3. SOP of CPO and PK products traceability (SOP11/ADM-ANI/(01)/0314, Rev 01) / 0314), the effective date on March 1, 2014 explaining that the facility to process the FFB into CPO and PK from certified and non-certified sources simultaneously (mixed), but in the administration / reporting stock by using separation between Mass Balance or separated between the stock of certified and non-certified CPO / PK. (SOP11/ADM-ANI/(01)/0314, Rev 01), effective since 1 March 2014

These procedures include:

- Aim: To ensure that the acceptance of FFB until the dispatch of CSPO / CPO is done with the right workflow, from FFB acceptance, FFB processing into CSPO / CPO, shipment of CSPO / CPO up to the reporting so that the FFB and product traceability can be easily and consistently.
- Scope: This procedure applies to any part that is responsible for providing the data of FFB acceptance, FFB processing until the delivery of CSPO / CPO to meet the RSPO certification and other certifications in the mill areas.

Person in charge based on those procedures, among others:

- Security officer: recording all the expeditions of FFB and dispatch of CSPO / CPO.
- Weighing officer (weighbridge): weighing all received FFB and delivered products and identifies the certified or non-certified products.
- Logistic: calculating the production results, dispatch, production reports, delivery reports and CSPO / CPO traceability.
- Sorting officers: Performed FFB grading according to the standards set.
- Head of Administrator: Monitoring the acceptance of FFB and CSPO/CPO.
- Mill Head: Guarantee the whole processing.

There is also evidence of SCCS training has been conducted consist of:

- Minutes of SCCS Training, on October 25, 2016 in Meeting Room of ANI Sambas POM (The Trainer is Dedi Sanjaya, Head of Logistic)
- The material consists of: SOP of FFB Acceptance, SOP of Mass Balance, SOP of CPO sales, SOP of CPO Shipment, attached the attendance list of Participants and Photographs of the implementation
- Documentation record (Attendant list & Picture)

Based on the results of field visits and interviews with officers at the weighbridge and grading areas (loading ramp) it can be seen that the workers related to their field have been running the reception, weighing and inspection of FFB which have been set by the management of Agronusa Investama POM, by referring to the procedures related with the implementation of SCCS.

Status: Comply

E.3.2

The site shall have documented procedures for receiving and processing certified and non-certified FFBs.

Agronusa Investama POM has had documented procedures for the receipt and processing of certified and non-certified FFB:

1. SOP of FFB Receive (SOP 02/SRT-ANI/(02)/0213 (Rev 02) effective since 20 February 2014 and SOP of FFB Receive from outside (001/TBS-SOP/VIII/2015, effective since 10 August 2015
2. SOP of Mass Balance No. 12/ADM-ANI/(01)0214 (Rev. 01) effective since 01 March 2014 which contains explanations:
 - Incoming FFB process, including through the data input of nucleus and outer FFB acceptance (outsider) with Sustainable FFB status (certified) and Non Sustainable FFB (non-certified) in the appropriate columns.
 - FFB data input process to be a Production Supervisor reports and reports of CPO / PK generated from sounding reports to determine the OER / KER and physical stock of CPO / PK in the appropriate columns.
 - Data input for shipments of CPO / PK from the mill process according to its status (Sustainable or Non-Sustainable Sustainable CPO / PK) in the appropriate columns.
 - Receiving and checking the DO status from Trading Head Office (Request of CSPO or non CSPO).
 - Based on the status of DO Request and the conditions of stock balance, determine the delivery types of CPO / PPK to be performed.
 - Fill the number for CPO / PK shipments according to the number and its status within the dispatch table and update the stock balance conditions based on the comparison of incoming and dispatch.
3. SOP of CPO and PK products traceability (SOP11/ADM-ANI/(01)/0314, Rev 01) / 0314), the effective date on March 1, 2014 explaining that the facility to process the FFB into CPO and PK from certified and non-certified sources

simultaneously (mixed), but in the administration / reporting stock by using separation between Mass Balance or separated between the stock of certified and non-certified CPO / PK. (SOP11/ADM-ANI/(01)/0314, Rev 01), effective since 1 March 2014	
	Status: Comply
E.4	Purchasing and goods in
E.4.1	
The site shall verify and document the volumes of certified and non-certified FFBs received.	
<p>Agronusa Investama POM has done documenting the volume of certified and non-certified FFB. The mechanism is as follows:</p> <ul style="list-style-type: none"> • Every acceptance of FFB are equipped with Delivery Order Letter detailing about the estate name, received date, Phase, Block Number, the amount of bunches, estimated tonnage, estate scales. The minutes of fruit sorting to know the quality of the fruit that comes. • Weigh slip (Weighbridge Slip) as a result of incoming FFB weight verification. Weighbridge slip contains information about the reference number; date: DO Number: Phase 1; Relation Code: Goods Code; Status: Purchases; Vehicle Number; Delivery Order Letter Number; Name of the driver; Information; admission hour and clocks out; Mill Gross; Tarra; Mill Netto; Dura; bunches amount; FFB Average rate; and fruit type. • Daily reports of mill activities including incoming FFB recapitulation from each estate. the reports are containing the information of received FFB (FFB balance), the production of CPO and PK, Extraction rate, Quality, and dispatch • The monthly report of mill activities including a recapitulation of received and processed FFB, extraction rates, dispatch, quality, losses, and mills performance • Mass Balance report made specifically for SCCS. The report contains the description of the recapitulations in every month and every three months for certified and non-certified fruits. <p>For the verification purposes of certified FFB incoming, the company has compiled a list of certified suppliers formally issued by the management of Agronusa Investama POM. The list is used as the official guide of mill staff in running the SCCS system mainly for identification and calculation of certified FFB.</p>	
	Status: Comply
E.4.2	
The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	
<p>ANI POM - PT Agronusa Investama can recognize and claim the certified products for a year for CPO products: 29,652. tons and Palm Kernels: 7,060 tons for the period of April 22, 2016 until April 21, 2017.</p> <p>Based on the production data per April 2016 until February 20, 2017, the total of CPO and Kernel produced by Agronusa Investama POM: CPO = 21,895 tons and Palm Kernels = 5,005 tons. Based on these data, it is known that the production of certified CPO and PK does not exceed the quota that can be claimed.</p>	
	Status: Comply
E.5	Record keeping
E.5.1	
<p>a. The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis.</p> <p>b. All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c. The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three months. However, a site is allowed to sell short.(ie product can be sold before it is in stock.)</p>	

Based on the company's records and RSPO electronic record keeping system, during the period of 2016 to 2017, Agronusa Investama POM only sold of CPO as RSPO certified. However, there are evidences of the balancing of all certified FFB acceptance and shipments of CPO / PK with a three-monthly basis in accordance with the applicable SOP of Mass Balance.

Period 206 to 2017	FFB	Certified Product		Despatch	
		CPO	PK	CPO	PK
April– June	1,761.120	5,869.16	1,158.95	-	-
July – Sept	1,837.180	6,150.61	1,498.51	-	-
Okt – Dec	1,564.880	6,602.39	1,465.03	-	-
Jan – Feb 207 17	1,175.980	3,273.26	882.86		

From the document verification and explanations by Mill Manager of Agronusa Investama POM and Mill Supervisor from the Regional Office of Pontianak, obtained information During the period of April 22, 2016 until the implementation of ASA 04 (February 2017) there is any sold of RSPO Certified products for CPO only via book and claim transaction for number of 242 MT. Refer to data from eTrace system that know any transaction of sold out product for CPO only, the number of transaction was 10,000 MT. Based information from Supervisor from the Regional Office of Pontianak was informed that the amount of certified product of CPO 9,758 MT still noted in book and claim.

Status: Comply

E.5.2

In cases where a mill outsources activities to an independent (not owned by the same organization) palm kernel crush, the crush still falls under the responsibility of the mill and does not need to be separately certified. The mill has to ensure that the crush is covered through a signed and enforceable agreement.

Until the implementation of ASA 04, Agronusa Investama POM - PT Agronusa Investama is not cooperating with the independent outsource palm kernel crushers.

Status: Comply

3.3 Conformity Checklist of Certificate and Logo Use

1.	Evidence of permission or approval certificate and logo from Certification Body which submitted by Client	X or ✓
ASA-4	The PT Agronusa Investama & ANI Sambas POM has had approval/permit the use of the certificate with the number MUTU-RSPO/024	✓
	Status: Comply	
2.	Implementation of certificate and logo used by Client comply with size and type (shape) against Guideline of Logo Use	X or ✓
ASA-4	The PT Agronusa Investama does not use the logo both in the on-product and off-product.	✓
	Status: Comply	
3.	Implementation of Certificate and Logo is not used on product	X or ✓
ASA-4	The PT Agronusa Investama does not use the logo both in the on-product and off-product.	✓
	Status: Comply	
4.	Controlling of Certificate and Logo, including withdrawing inappropriate logo.	X or ✓
ASA-4	The PT Agronusa Investama does not use the logo both in the on-product and off-product.	✓
	Status: Comply	

3.4 Summary of RSPO Partial Certification

Compliance of the uncertified management units of Wilmar International Ltd against the rules for partial certification was determined through Self Assessment in accordance with RSPO Certification System clause 4.2.4. A summary of findings is as stated below.

Wilmar International Ltd Time Bound Plan (TBP) is explained in point 1.10. Wilmar International Ltd has informed the TBP progress, MUTU has considered that Wilmar International Ltd is complied with the RSPO requirement for TBP. The Time Bound Plan was revised and declared by Wilmar International Ltd on September 2016.

MUTU has verified partial certification for un-certified unit's subsidiary of Wilmar International Ltd based on their Time Bound Plan. There are seven (7) uncertified mills and sixteen (16) uncertified estates of Wilmar International Ltd. MUTU Auditor verified positive assurance against the company internal audit and supporting evidence as well as any information from others sources.

MUTU Auditor has verified company partial certification and concludes that:

- There are no significant land conflicts which have not been declared above.
- The company has follow RSPO requirement related to New Planting Procedure and Remediation and Compensation Procedure.
- There are no labour disputes that are not being resolved through an agreed process.

All plantations established since 2005 have been done so in accordance with the applicable laws of the country and that there is no evidence of non-compliance with law in any of the non-certified holdings which has not been declared above.

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p>Yes and positive assurance is produced for these units.</p> <p>Auditor verification</p> <p>There is internal audit produced for</p> <ul style="list-style-type: none"> - PT Agronusa Investama Pahauman - PT Karunia Kencana Permaisejati - PT Bumipratama Khatulistiwa - PT Agro Palindo Sakti 2 - PT Musi Banyuasin Indah - PT Sinarsiak Dianpermai - PT Agroindo Indah Perkasa 2 <p>And positive assurance is produced for these units.</p>
2.1.2	<p>No replacement after dates defined in Nis Criterion 7.3 of:</p> <ul style="list-style-type: none"> • Primary forest. • Any area identified as containing High Conservation Values (HCVs). • Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3. 	<p>WILMAR International Ltd has submitted liability disclosure to RSPO on 31 July 2014 and LUCA template on 3-8 March 2015</p> <ul style="list-style-type: none"> - PT Agronusa Investama Pahauman, LUCA document was verified by RSPO on 1 Sept 2015. The 2nd LUCA verification document was on 2nd Nov 2015 with result of PASS WITH CLARIFICATION. - PT Karunia Kencana Permaisejati, The final RSPO endorsement from RSPO compensation on 11 November 2015 with result of pass with clarification. And at current still on process on fulfil the clarification. - PT Bhumi Pratama Khatulistiwa, Submitted liability disclosure to RSPO on 8 Dec 2015 and

		<p>LUCA template on August 2015. The final RSPO endorsement from RSPO compensation on 29 September 2016 is 0 ha therefore there is no compensation plan required</p> <ul style="list-style-type: none"> - PT Agro Palindo Sakti 2, LUCA doc was verified by RSPO on 1 Sept 2015. The 2nd LUCA review was on Dec 2016 with result of PASS - PT Musi Banyuasin Indah, 0 liability confirmed by RSPO Compensation. There is no planting after 1 November 2005 - PT Sinarsiak Dianpermai, 0 liability confirmed by RSPO Compensation. There is no planting after 1 November 2005 - PT Agroindo Indah Perkasa 2, 0 liability confirmed by RSPO Compensation. There is no planting after 1 November 2005 <p>Auditor verification Auditor has verified the supporting evidence of above the company statement. The above statement in accordance with the supporting evidence provided.</p>
2.1.3	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>No new planting/land clearing after 1st January 2010.</p> <p>Auditor verification</p> <ul style="list-style-type: none"> - PT Agronusa Investama Pahauman, The first planting year was in 1999. The latest land clearing was in 2009 based on: LUCA analysis 2009 where the area was already bare land area. LUCA has been submitted to RSPO as part of company disclosure requirement. - There is no new planting after 1st January 2010 for PT Karunia Kencana Permaisejati, PT Bumipratama Khatulistiwa, PT Agro Palindo Sakti 2, PT Musi Banyuasin Indah, PT Sinarsiak Dianpermai, PT Agroindo Indah Perkasa 2
2.1.4	Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	<p>There is no land conflicts.</p> <p>Auditor verification There is no information from public source and RSPO website on any land conflict for uncertified unit of the group subsidiaries.</p> <p>Based on the company record there is documentation on land compensation recapitulation updated on 1 October 2007, participatory mapping, agreement letter on compensation between company and land owner, land owner identity and procedure on compensation technical guidance SOP 001/WIP-KB/(0)/0610 dated June 2010.</p>
2.1.5	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	<p>There is no labor disputes.</p> <p>Auditor verification</p>

		<p>There is no information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries.</p> <p>The company has mechanism to handle employee complaint and grievance that is stated in SOP 005/WIP-KB/(0)/0610 for communication and consultation with community and SOP 004/WIP-KB/(0)/ 0610 on complaint and grivance mechanism and solving any dispute out off court.</p> <p>There is no list of employee and stakeholder complaint and grievance.</p>
2.1.6	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	<p>Yes, there is process for land legality.</p> <p>Auditor verification</p> <p>PT Agronusa Investama Pahauman</p> <ul style="list-style-type: none"> - The continues changing on PIPIP map. In accordance to PIPIP 10 there is no area of the company (based on location permit) that is in the moratorium area. When PIPI 11 released, some area of the company is in the updated peat moratorium map. <p>PT Karunia Kencana Permaisejati</p> <ul style="list-style-type: none"> - Overlapping HGU with Another plantation. The verification information is referred to 2.1.3 (legal document on operational and land ownership owned by the company) <p>PT Agro Palindo Sakti 2</p> <ul style="list-style-type: none"> - There is an obstacle on processing HGU is before continuing the HGU process, the company has to complete the requirement for 20% area allocation for smallholder. Based on BupatiSanggau Decree No. 137 year 2011 dated 25 March 2011 for 623 ha of smallholder scheme for 2 koperasi of Batu Ceramin and and Maju Bersama. Later, koperasi Maju Bersama split into Koperasi Maju Bersama and Koperasi Harapan Baru. And Koperasi Harapan Baru wants to take about 136 ha within company proposed HGU area. The company needs to resolve this issue first before be able to continue HGU process. <p>PT Musi Banyuasin Indah</p> <ul style="list-style-type: none"> - Overlay the map of land use with attachments Ministerial Decree No. SK.822/Menhut-II/2013 PT MBI entered in production forest area. - Planting outside HGU Kebun Sei Selabu (block 010, 024 and 027). <p>Explanation management unit following the legal department still perform continuous coordination with</p>

		<p>the government while waiting for a change of government decisions regarding the status of the area.</p> <p>PT Sinarsiak Dianpermai</p> <ul style="list-style-type: none"> - HGU 1,002 Ha on process - Status Areal Penggunaan Lain berdasarkan Lampiran SK 878/Menhut-II/2014 tanggal 29 September 2014 dan Surat No. S.160/BPKH.XIX-3/2016 tanggal 31 Maret 2016 <p>Explanation management unit as follows:</p> <ul style="list-style-type: none"> - Disagreement between the ministry of forestry by the Riau provincial government on the status of land PT SSDP (between the status of forest and APL), which led to the process of making the concession inhibited. - There are some estate areas around the Mill that does not have permission locations. The process of acquiring a location permit was hampered due to the reasons in point 1 as well. - The legal department is still doing continuous coordination with the government while waiting for a change of government decisions. <p>PT Agroindo Indah Perkasa 2</p> <ul style="list-style-type: none"> - There is HGU on propose.
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3.5 Identification of Findings, Corrective Action, Observations, OFI and Noteworthy Positive Components
3.5.1 Identification of Findings, Corrective Actions and Observations at ASA-3 Assessment

CAR No	Ref Std	Finding	Area	Grade	Time Limits	Corrective Action	Observation	Status	Closing Date
2016.1	Major 1.1.2	Request and Response of Information Document review results of incoming mail records of PT ANI contained Letter No. 582/324/BPMPPT-4/2015 dated November 24, 2015 from the Head of Investment and Integrated Licensing Services regarding to the reports of measurement activities, installation of boundaries pole, and creating a buffer zone. However, not enough evidence that the company had responded to the letter.	Estate and Mill	Major	18 April 2016	The company must be able to show the evidence of response to the requests from existing information and carried out on time in accordance with the established procedures.	<ul style="list-style-type: none"> • Root cause: There is no response to the letter because the PIC unit does not run the mechanism of internal communication flow in response to the requests for information. There is no response to the letter because the PIC unit does not run the mechanism of internal communication flow in response to requests for information. Where should the letter received by the unit must be submitted to Bina Mitra Department in Liaison Office Pontianak. The change of PIC which handles incoming and outgoing mail and do not understand the new PIC procedure in response to requests for information. • Corrective action (+evidence) <ul style="list-style-type: none"> - Sending a response letter to the Head of Investment and Integrated Services. Evidence: Letter of response and receipt. - Provides an understanding to 	Closed	May 23 rd 2016

CAR No	Ref Std	Finding	Area	Grade	Time Limits	Corrective Action	Observation	Status	Closing Date
							<p>the PIC procedure for responses to information requests. Evidence: documentation socialization of explanation procedures in response to requests for information</p> <ul style="list-style-type: none"> Preventive action: PIC who is responsible for incoming and outgoing mail must ensure that the response letter must be sent within 14 days. PIC: Iswardi, Nunung, Iqbal Raihani. Evidence: Logbook incoming and outgoing mail. Auditor Observation: April 5th 2016 The company showed Letter No. 023/BM-ANIS/EXT/III/2016 dated March 30, 2016 regarding the response to the letter from the Board of Investment and Integrated licensing Services No. 582/324/BMPPT-4/2015 which has been accepted by the relevant agencies on April 1, 2016 in accordance with the receipt documents. May 23rd 2016 The Company showed document 		

CAR No	Ref Std	Finding	Area	Grade	Time Limits	Corrective Action	Observation	Status	Closing Date
							<p>Socialization Response Procedures Flow Request Information dated April 18, 2016 submitted to the officer responsible for receiving requests for information in the form of a letter or email and recalls the response deadline is 14 days since the request for information is received. The company also shows the log book recording incoming and outgoing mail, equipped with a response date information to ensure that the deadline for responses in accordance with procedures established by the company (14 days).</p> <p>• Auditor Conclusion: Based on the evidence submitted relating to corrective and preventive actions are determined by the company, non-conformity No. 2016.01 stated fulfilled.</p>		
2016.2	Minor 4.6.4	Pesticide use reduction program with category of Class 1B WHO The company could not show a reduction program in the use of pesticide with the active ingredient of <i>Coumatertraly</i> in rat pest control.	Estate and Mill	minor	ASA-4	The company must be able to show the reduction program in the use of pesticide with the active ingredient of <i>Coumatertraly</i> which is a pesticide Class 1B category of WHO, in the rat pest control.	<p>• Root cause: Does not have any program for reduction of pesticide with class category 1B WHO.</p> <p>• Corrective action (+evidence) Creating program for reduction of pesticide with class category 1B WHO. Records of pesticide use reduction</p>	Closed	20 Februari 2017

CAR No	Ref Std	Finding	Area	Grade	Time Limits	Corrective Action	Observation	Status	Closing Date
							<p>program by means of the installation of owl cage.</p> <p>Data pesticide active ingredient of CoumatertralyI on 2016 smaller than the data usage on 2015.</p> <ul style="list-style-type: none"> Preventive action: Monitoring the implementation of the pesticide reduction program WHO grade 1B category. <p>PIC : Estate manager and manager agronomy.</p> <ul style="list-style-type: none"> Auditor conclusion: 20 February 2017 The Company showed Program for Making Owl Cage period 2016 which explains the program period July to December 2016 and has realized mounting as much as 9 units, in Division Senabah 2 units (blocks 119 and 122) and 3 unit in the Division Kumpai at block 105 , 027 and 010. Based on the field visit in Division Kumpai block 027 and in Plasma Cempaka Biru block 927, there are a owls cage (Gufon) in the good condition. <p>Based on review documents of Pesticide Uses, it is known rodenticide use with active ingredients coumatetralyl/warfarin</p>		

CAR No	Ref Std	Finding	Area	Grade	Time Limits	Corrective Action	Observation	Status	Closing Date
							<p>are decreased. The rodenticide used on 2015 as much as 4.276 kg and in 2016 as much as 2,250 Kg.</p> <p>The company also shows the Handbook of Agronomy and SOP of Oil Palm on 2015 Chapter 8 about the Plant Protection of Pests and Diseases. The SOP explaining that the use of pesticides for rat control only performed on blocks that census result showed symptoms of damage more than 5%.</p> <p>Based on the explanation, it is known that the company has demonstrated efforts and programs to reduce the use of pesticides that are included in WHO category 1B, Based on the evidence of corrective action, so that the nonconformity can be stated fullfiled.</p>		
2016.3	Minor 6.1.4	<p>Plans should be reviewed at least two years and updated as necessary by involving the affected parties.</p> <p>PT ANI already has a Report of Environmental Management Plan/Environmental Monitoring Plan Implementation and Report of Social Impact Study consists of Management and Monitoring Plan in 2011 to 2015. However, it is not yet enough evidence that has been done review at least two years on the plans and the process of</p>	Estate and Mill	minor	ASA-4	The company must be able to show the evidence that has been done the review at least two years on the plans and the process of the review by involving the affected parties.	<ul style="list-style-type: none"> Root cause: PIC has not understood that it should conduct a review of management plans and monitoring the social impact of the year 2011 - 2015 in accordance with the demand for the latest P & C. Corrective action (+evidence) Conduct a review of management plan and social impact monitoring in 2011 - 2015 in a participatory by involving community / stakeholder of 	Closed	21 Feb 2017

CAR No	Ref Std	Finding	Area	Grade	Time Limits	Corrective Action	Observation	Status	Closing Date
		the review by involving the affected parties.					<p>company.</p> <ul style="list-style-type: none"> Preventive action: Conduct monitoring to ensure the implementation of review of management plan and monitoring of the social impact has been conducted every two years. Auditor conclusion: 20 February 2017 Has been shown evidence of improvement, among others: <ul style="list-style-type: none"> Document Review of Plan and Monitoring of the Social Impact of PT ANI 2016, containing: Sources of impact, parameters measured, Objective Monitoring, Data Collection and Analysis Methods, Location Monitoring, Implementation and results of the review Minutes of the implementation of the FGD between employees of PT ANI Sambas with stakeholders (community and the Village Government), dated 9-11 August 2016, participatory discussion regarding the Review of Plan and Monitoring of Social impact in PT ANI 2016 Attendance List 		

CAR No	Ref Std	Finding	Area	Grade	Time Limits	Corrective Action	Observation	Status	Closing Date
							<ul style="list-style-type: none"> Photographs of FGD implementation <p>Based on the evidence of corrective action, so that the nonconformity can be stated fullfiled.</p>		
2016.4	Minor 6.5.3	<p>Planters and Palm Oil Mill Employers must provide adequate housing.</p> <p>Based on the observations during field visit on the Mill Employees Housing, there are some houses in poor condition (for example, the walls were cracked/broken) and sanitary conditions around the housing area are inadequate.</p>	Estate and Mill	minor	ASA-4	The company must provide adequate housing facilities and adequate sanitation conditions.	<ul style="list-style-type: none"> Root cause: There are no housing maintenance programs and repair program for mill housing complex Corrective action (+evidence) Creating a maintenance program of housing and environmental sanitation at mill housing complex Preventive action: Conduct the monitoring periodically to assess the condition of housing and sanitation Auditor conclusion: 21 February 2017 The company has shown evidence of improvement for the walls of houses and sanitation in mill housing complex <p>Based on field visits, it is known that the houses and the surrounding area at worker housing complex of ANI</p>	Closed	23 Feb 2017

CAR No	Ref Std	Finding	Area	Grade	Time Limits	Corrective Action	Observation	Status	Closing Date
							<p>POM has been fixed.</p> <p>Based on the evidence of corrective action, so that the nonconformity can be stated fulfilled.</p>		
2015.5	RSPO Cert. System 4.2.4	Implementation of Time Bound Plan PT ANI has had the scheme smallholders since 2010 but has not been included in the Time Bound Plan.	Estate and Mill	minor	ASA-4	The company must be able to show the proof that the scheme smallholders have been included in the Time Bound Plan and implemented.	<ul style="list-style-type: none"> Root cause: The company does not monitoring the Time Bound Plan consistently Corrective action (+evidence) Inform timebound plan containing all units supplier of FFB that will be RSPO certified <i>Evidence:</i> Timebound Plan RSPO Wilmar on 2016 Preventive action: Updating the timebound plan periodically Auditor conclusion: 22 February 2017 It has been shown updating Time Bound Plan of Wilmar International Limited on 2017 which has included Smallholder (Sentama Lestari and Cempaka Biru) as associated smallholder directly with PT Agronusa Investama Based on the evidence of corrective 	Closed	22 Feb 2017

CAR No	Ref Std	Finding	Area	Grade	Time Limits	Corrective Action	Observation	Status	Closing Date
							action, so that the nonconformity can be stated fulfilled.		

3.5.2 Identification of Findings, Corrective Actions and Observations at ASA-4 Assessment

NCR No.	: 2017.01	Issued by	: Asystasya Aishah Silalahi Muhammad Rinaldi
Date Issued	: 23 February 2017	Time Limit	: 24 April 2017
NC Grade	: Major	Date of Closing	: 21 April 2017
Standard Ref. & Requirement	: 2.1.1 Evidence of compliance with relevant legal requirements shall be available.		
Non-Conformance Description & Evidence observed:			
Employment Company has temporary daily worker for each uni estate and mill. Based on interview with the management representative, it is known that there is no written work agreement for temporary daily worker in ANI Estate. The work agreement is done verbally to the worker when they are accepted. But, based on payslip document review, it is known that there are temporary daily workers (harvester) who work more than 21 days for 3 months or later. It is not in accordance with Kepmenaker No. 100 2014 “Ketentuan Pelaksanaan Perjanjian Kerja Waktu Tertentu” which also written on company’s law register on point: <ul style="list-style-type: none">• 1.4 In case worker works more than 21 days for 3 months or later consecutively, so the daily worker work agreement change to permanent worker.• 1.5. Company must make the written work agreement for temporary daily worker			
OHS The company has had 11 operators that have Heavy Equipment Licenses, however it is known that there are 9 licenses has been expired. For example, license named Edi Susanto (Excavator Operator of ANI Estate) has been expired on June 1, 2016. This is not in accordance with Labor Ministerial Regulation No. 09 of 2010.			
Root Cause Analysis: <ul style="list-style-type: none">1. There is no monitoring of the probation period for contract workers (harvesters)2. There is no PIC for monitoring SIO			
Corrective Action: <ul style="list-style-type: none">1. Appoint a contract worker who has worked 21 days / months or more who worked for 3 consecutive months to become a permanent worker.2. Each new employee is required to undergo a trial period of 3 months with a decree issued for probationary employee.3. Takes care of the SIO extension for every operator that has expired.			
Preventive Action: <ul style="list-style-type: none">1. PGA and unit head conduct monitoring and evaluation of probation employees.2. Employees who pass through the probation period will be appointed permanent worker with issued appointment decree, for employees who fail to pass the trial period will be terminated.3. The PGA monitors the validity period of SIO			
Assessor Evaluation and Conclusion: Observation April 21, 2017 The Company has provided proof of improvement such as: <ul style="list-style-type: none">- Monitoring the working period of contract worker working in each estate, with details of Senabah Estate as many as 37 workers and Kumpai Estate as many as 16 workers.			



- Result of contract worker probation evaluation and appointment decree to become permanent worker.
- Sample Letter of contract worker Working Agreement which has explained employee status and worker salary system.
- Monitoring the validity of SIO.
- SIO for extended lifting & hauling aircraft for 9 operators with validity period up to March 9, 2022.

Therefore, **Non-Conformity No.2017.01 otherwise fulfilled but will be observed further in the next assessment.**

Verified by	:	Asystasya Aishah Silalahi
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NCR No.	:	2017.02	Issued by	:	Oktovianus Rusmin
Date Issued	:	23 February 2017	Time Limit	:	24 April 2017
NC Grade	:	Major	Date of Closing	:	21 April 2017
Standard Ref. & Requirement	:	2.2.1 Documents showing legal ownership or lease, history of land tenure ownership/control, and the actual legal use of the land shall be available.			
Non-Conformance Description & Evidence observed:					
Until the implementation of the ASA 04, Certificate of Land Use Right of PT Agronusa Investama is not yet issued, there is a Request Revision on behalf of PT Agronusa Investama from the Director of PT Agronusa Investama Number: 054 / ANI-BM / HGU / IX / 2014, dated September 22, 2014 to National Land Agency (BPN) of West Kalimantan Province and ensure the Status of Moratorium. But until now there has no progress or follow-up of it.					
Root Cause Analysis:					
Progress acquisition Land Use Title ANI Sambas is hampered due to adjustments of land size proposed for Land Use Title :					
Land area according to map of previous Land Use Title submission that is: 7,910,93 Ha					
Based on the guidance from National Land Agency (BPN) of West Kalimantan Province through letter No.505/9.61/III/2013 dated March 22, 2013. Adjustment of the area requested is :					
<div><div>1.</div><div>Reduction Land Location of POM is issued because it will be submitted process to become Building Use Title.</div></div> <div><div>2.</div><div>Reduction of operational areas to add a shortage of smallholders to achieve 20%.</div></div> <div><div>3.</div><div>Reduction of production forest area.</div></div> <div><div>4.</div><div>Reduction of land dispute.</div></div> <div><div>5.</div><div>Addition (area in business permit but not yet included in previous Land Use Title application).</div></div>					
So that the extent of land re-submitted request Land Use Title is 7,049.69 Ha					
Corrective Action:					
Apply for revision of Land Section Map an. PT Agronusa Investama to National Land Agency Regional Head of West Kalimantan Province.					
Preventive Action:					
Follow up and follow the process of publishing land situation map revisions.					
Assessor Evaluation and Conclusion:					
Verification April 21, 2017					
The company shown progress of Land Use Title arrangement in form of land situation map revision in accordance with letter from National Land Agency of West Kalimantan Province No.505/9.61/III/2013 dated March 22, 2013 which requires reduction of some area in PT ANI related to POM area, smallholders and production forest area.					
The Company presented Revision Letter of land section map (No.021/ANI-BM/HGU/II/2017 dated February 6, 2017) authorized by Director of PT ANI and received by National Land Agency Regional Office of West Kalimantan Province on February 13, 2017. The letter explained the reduction in some areas on the land situation map No.072-14.02-2011 by guidance of National Land Agency. Total area reduce area 912.27 Ha with details as follows :					
<div><div>•</div><div>2 POM location of 33.65 Ha</div></div> <div><div>•</div><div>Forest Area of 134.51 Ha</div></div> <div><div>•</div><div>Land dispute of 75.65 Ha</div></div> <div><div>•</div><div>Land for smallholders of 668.46 Ha</div></div>					
The letter also explains that there are additional areas included in the scope of Business Permit covering 51.02 Ha. So the total area proposed on the map revision is 7,049.69 Ha.					
Therefore, Non-Conformity No.2017.02 otherwise fulfilled but will be observed further in the next assessment.					

Verified by	:	Muhammad Rinaldi
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NCR No.	: 2017.03	Issued by	: Oktovianus Rusmin
Date Issued	: 23 February 2017	Time Limit	: Recertification
NC Grade	: Minor	Date of Closing	:
Standard Ref. & Requirement	2.2.3 In the event that there is a dispute or a dispute has occurred, adequate evidence of legitimate acquisition and compensation or compensation settlement process through conflict resolution which has been received through Free, Prior and Informed Consent by all related parties shall be provided.		
Non-Conformance Description & Evidence observed: Based on the verification of documents of Area Statement that known there was any area of PT Agronusa Investama area number of 127.87 hectares cultivated by others. The results of field visits in Kumpai Estate was shown there is an area between Block E051 (Core Plantation) and Block 914 (Smallholder Area) was occupation by the other party for rubber plantation and semi-permanent houses. The company has not been able to show evidence of record on handling those areas.			
<div style="display: flex; justify-content: space-around;">   </div>			
Root Cause Analysis:			
Corrective Action:			
Preventive Action:			
Assessor Evaluation and Conclusion:			
Verified by	:		

NCR No.	:	2017.04	Issued by	:	Muhammad Rinaldi
Date Issued	:	23 February 2017	Time Limit	:	Recertification
NC Grade	:	Minor	Date of Closing	:	
Standard Ref. & Requirement	:	4.2.2 Records of fertilizer inputs shall be available			
Non-Conformance Description & Evidence observed:					
<ul style="list-style-type: none"> • The Company has not been able to show evidence of fertilization record for Cempaka Biru Smallholders. • Based on the verification of Fertilizer Programme on 2016 for Sentama Lestari Smallholders, it is known that fertilization activities do not conducted in accordance with the program and the company has not been able to show the evaluation of it. 					
Root Cause Analysis:					
Corrective Action:					
Preventive Action:					
Assessor Evaluation and Conclusion:					
Verified by	:				

NCR No.	: 2017.05	Issued by	: Muhammad Rinaldi
Date Issued	: 23 February 2017	Time Limit	: Recertification
NC Grade	: Minor	Date of Closing	:
Standard Ref. & Requirement	: 4.5.2 Training records of Integrated Pest Management (IPM) shall be available.		
Non-Conformance Description & Evidence observed:			
The company could not show evidence of IPM training to workers on smallholdings			
Root Cause Analysis:			
Corrective Action:			
Preventive Action:			
Assessor Evaluation and Conclusion:			
Verified by	:		

3.5.3 Opportunity for Improvement

No	Ref Std	Descriptions
1	4.3.5 Minor	Company has opportunity to ensure the type of soil replanting plan areas (Observation).
2	4.4.2 5.2.2 MAJOR	Company has opportunity to ensure that the recommendations of riparian monitoring for periode January 2017 immediately implemented, for example maintenance and installation of the missing riparian boundary markers and the line of agrochemical applications.
3	4.6.6 5.3.2 MAJOR	Company has opportunity to document the use of ex pesticide containers in the balance sheet and monthly record of Hazardous waste, other than in the Bin Card as has been done.
4	4.7.4 MAJOR	Company has opportunity to ensure ratification of P2K3 structure which has been submitted to the local Manpower Agency (Observation)
5	5.1.1 MAJOR	Company has opportunity to conduct a study of environmental and social impact analysis on replanting activities which will be conducted in 2017 (Observation)
6	6.11.1 Minor	Company has an opportunity to conduct identification in determining the local development needs
7	7.3.1 MAJOR	HCV identification in company's operational area has conducted in 2011 and from 2005-2011 the company has made new planting of oil palm. Related to this, the company has conducted Land Use Change Analysis, and submit a report disclosure and compensation liability related to area that opened after the period of November 2005 without preceded by the HCV identification to Dillon Samrin via email April 8, 2015 (RSPO. compensation@rspo.org). Until the ongoing activities of ASA-04, the RSPO is still verifying the reports related to disclosure and compensation liability that companies send (Observation)

3.5.4 Noteworthy Positive Components

No	Descriptions
1	The company's commitment to implementing the principles of sustainable management of oil palm.
2	Has achieved RSPO Certificate in 2012
3	The award of the Ministry of Environment and Forestry (Program Performance Rating In Environmental Management - PROPER Blue, 2014-2015)
4	Have done Partnership Cooperation Agreement with the surrounding community through Sentama Lestari Cooperative and Cempaka Biru Cooperative.
5	Responsible Personnel in Charge (PIC) assisted during the audit.

3.6 Summary of Arising Issues from Public and Auditor Verification

Public Issues (Institution/ NGO/Community)	Auditor Verification
Food and Agriculture Departement of Sambas District (Plantation Division). The interview did not done because the personnel in charge related to information request by the auditor was not in the office	-
National Land Agency of Sambas District The interview did not done because the personnel in charge related to information request by the auditor was not in the office	The auditor has been issued NCR related to legality of Land Use Right of PT Agronusa Investama (Indicator 2.2.1)
Housing, Settlement and Environment Departement of Sambas District (Environmental Division) <ul style="list-style-type: none"> The company has had environmental documents (EIA) The company has had hazardous waste storage approved by local government The company has had permit from local government regarding disposal of waste water treatment plants to water or water sources. The test results periodically sent to the local government. There is no issue of environmental pollution 	<ul style="list-style-type: none"> The Company has a document on Environment Impact Assessment (EIA) approved by the EIA Commission, on behalf of Minister of Forestry No. 635 / Menhut-II / 2001 dated May 1/2001. It was in accordance with indicators 5.1.1 The company has had hazardous waste storage approved by local government (SK No. 422 / BLH / 2016, May 16, 2016 (period of validity of 5 years). It was in accordance with indicators 4.6.6 The Company did not make use of waste water treatment plants on land (<i>land application</i>), but flowed to water sources has received permission from the local government (<i>Sighted: Government Decree No. 421 / BLH / 2016, dated May 16/2016</i>). It was in accordance with indicators 4.4.3 The test results periodically sent to the local government. It was in accordance with indicators 4.4.3
Manpowerand Transmigration Departement of Sambas District (Disputes and industrial relations division) <ul style="list-style-type: none"> The wages of all workers have been paid in accordance with the local government (UMSK). The Company has provided housing, water, electricity, masques, clinics, etc. to workers. All workers have registered with the program BPJS. There are workers who have not employment contracts and there are workers who have not been appointed PKWTT There is an accident at the companies There are no child laborers under age at the companies 	<ul style="list-style-type: none"> The wages of all workers have been paid in accordance with the local government (UMSK). It was in accordance with indicators 6.1.5 The Company has provided housing, water, electricity, masques, clinics, etc. to workers. It was in accordance with indicators 6.5.3 All workers have registered with the program BPJS. It was in accordance with indicators 4.7.6 Related with labor contracts become nonconforming No. 2017.01. It was not in accordance with indicators 2.1.1

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> There are no foreign workers at the companies There are no labor discrimination at the companies 	<ul style="list-style-type: none"> There is an accident at the companies. It was in accordance with indicators 4.7.2;4.7.7 There are no child laborers under age at the companies. It was in accordance with indicators 6.7.1 There are no foreign workers at the companies. It was in accordance with indicators 6.12.1 There are no labor discrimination at the companies. It was in accordance with indicators 6.8.2
<p>Public consultation conducted through Focus Group Discussion with Village Chief, Community Leader, Representative Body of Village Community, Community Representative, and board of Cooperative. The interview points, among others:</p> <ul style="list-style-type: none"> Increased economic level of the community. There is no issue related to the negative impact on the environment caused by the management of estate and mill in PT. Agronusa Investama. There is no conflict in the land management that occurs between the communities with the company. The village representative expects the company will help to build barracks for smallholders member. The company has given training related to best management practice to smallholders members and workers. The company is expected to provide the CSR Help to the village regularly. In order to arrange the CSR Program, company should know and in accordance to situation and condition of the village. 	<ul style="list-style-type: none"> There was no significant issues related to conflict between the company and community surround There was no issues related to complaint from the other parties related to impact of plantation and mill operation to environment The company has been conducted several CSR programme for community surround, i.e: aid for road maintenance, aid for religion day, etc The company was cooperation with two smallholder group (Sentama Lestari & Cempaka Biru)
<p>Gender Committee - PT Agronusa Investama</p> <ul style="list-style-type: none"> Company has women committee. Until the audit is conducted, there is no complaint related to sexual harassment and discrimination. Women committee has socialized related female workers' rights and complaint mechanism in case the sexual harassment is occurred. Female workers have menstruation leave (H1), maternity and pregnant leaves for about 3 months. The pregnant female worker is prohibited working with chemical material. Women committee meeting is held 3 times in a year. 	<ul style="list-style-type: none"> Company has prohibited the pregnant female worker to work with chemical material. It is in accordance with indicator 4.6.12 Based on field observation and interview with workers, there is no discrimination issue in company. It is in accordance with criteria 6.8 Based on interview with female workers, it is known that they have menstruation leave (H1), maternity and pregnant leaves for about 3 months. It is in accordance with criteria 6.9
<p>Head of Worker Union – PT Agronusa Investama</p> <ul style="list-style-type: none"> Company gives freedom to worker to join the labor union. The labor union is established since 2012 and has been registered to Labor Agency of Sambas Regency. 	<ul style="list-style-type: none"> The company has implemented the minimum wage according to the Governor decree related to Sectoral Minimum Wage for 2017. It is in accordance with indicator 6.5.1

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> • Bipartite cooperative has gone well. Labor union has socialized related to minimum wage for year 2017 and wholesale price for harvester according to tonnage for year 2107. • Labour union meeting is held 3 times in a year. • Representative from labor union is involved in P2K3 meeting. • There is no complaint related to child labor, discrimination, sexual harassment, or human rights. 	<ul style="list-style-type: none"> • The labor union has registered to Labor Agency. It is in accordance with criteria 6.6 • Based on field observation, there is no child labor. It is in accordance with criteria 6.7 • Based on field observation and interview with workers, there is no discrimination issue in company. It is in accordance with criteria 6.8 • Based on interview with female workers, it is known that they have menstruation leave (H1), maternity and pregnant leaves for about 3 months. It is in accordance with criteria 6.9 • Based on interview with worker, there is no issue related to human rights violation. It is in accordance with criteria 6.13.
<p>Local Contractor <u>CV Pulau Indah (Buildings Construction)</u></p> <ul style="list-style-type: none"> • When there is a job offer from the company (PT ANI Sambas), the contractor gives the company profile to the PT ANI Sambas • There Cooperation Agreements between the local contractors and the PT ANI Sambas • Before signing the Cooperation Agreements, the companies explain the clauses of the agreement, and the rights and obligations of each party. • Letter of Employment Agreement will be revised in accordance with the conditions, such as freight price adjustments to operational costs (fuel prices). • Completeness of Personal Protective Equipment and Health Insurance (BPJS) from local contractors workers is the responsibility of the contractor • Evaluation by PT ANI Sambas to local contractors is done by checking the latest condition of the building before it handed over to the employer • Payment of the PT ANI Sambas are classified as current in accordance with a clause in the Employment Agreement Letter • Technical constraints typically encountered by a local contractor was flooded during the rainy season which sometimes lead to operational vehicles FFB from the garden to the plant has been delayed. <p><u>Aspiration:</u> Empowerment of local contractors and surrounding communities through partnering opportunities with the company.</p>	<p>There was shown sample of work contract between the company and local contractor. These document contain of information related to payment mechanism and another obligation for each party.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p><u>Endang Ernawati (FFB Transporter)</u></p> <ul style="list-style-type: none"> • Has cooperated with PT ANI Samba since 2014 • The PT ANI Sambas always offers first jobs to local contractors, before the signing of the Employment Agreement • The main requirement for local contractors will cooperation with the PT ANI Sambas is the taxpayer evidence from local contractors, a driver's license for a truck driver who will be employed and the willingness to set up a self protection and health insurance for workers • Payment of the PT ANI Sambas are classified as current in accordance with a clause in the Employment Agreement Letter • Cooperation since 2014 has been running smoothly and if there are problems, it will usually overcome with refer to clauses in employment agreements 	<p>There was shown sample of work contract between the company and local contractor. Obligation for the local contractor are included of :</p> <ul style="list-style-type: none"> • Covered their employee with insurance • Comply to Labor regulation, included of give basic minimum salary to their employee • Provide of Personal Protective Equipment • Driving license for the driver, etc <p>There was shown sample proof of payment records on 16 January 2017 from PT Agronusa Investama to local contractor. Based interview with the local contractor that knows the payment process was routinely as clause in contract and there was no problem related to consistency time of payment in every month.</p>
NGOs (AMAN, Walhi and WWF Indonesia)	There was no response from NGOs
Local NGO Lembaga Gemawan	There was no response from NGOs

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY
4.1	Formal Sign-off of Assessment Findings
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p style="text-align: center;">Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end; padding-top: 50px;"> <div style="text-align: center;"> <p>PT. Agronusa Investama Sustainability Controller Wilmar Group</p>  <p><u>Simon Siburat</u> Friday, 21 April 2017</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><u>Oktovianus Rusmin</u> Friday, 21 April 2017</p> </div> </div>

Appendix 1. List of Stakeholder Contacted in the RSPO Certification Process

No	Institution/NGO/Community	Address	Phone/Email	Form of Communication	Date of Contact	Response	
						Yes	No
1	National Land Agency (Badan Pertanahan Nasional) District of Sambas	District of Sambas	-	Visiting	20 February 2017		✓
2	Housing, Settlement and Environment Departement of Sambas District (Environmental Division)	District of Sambas	-	Interview	20 February 2017	✓	
3	Food and Agriculture Departement of Sambas District (Plantation Division)	District of Sambas	-	Visiting	20 February 2017		✓
4	State Department of Manpower, Social and Transmigration (Dinas Tenaga Kerja, Transmigrasi dan Sosial) District of Sambas	District of Sambas	-	Interview	20 February 2017	✓	
5	NGOs (AMAN, Walhi and WWF Indonesia)	-	rumahaman@cbn.net.id informasi@walhi.or.id wwf-indonesia@wwf.or.id	Letter and questionnaire via email	17 February 2017		✓
6	Local NGO Lembaga Gemawan	Jl. Batas Pandang Kompleks Kelapa Hijau No. 18, Pontianak 78117, Kalimantan Barat	+62-561-586891 +62-561-586891 www.gemawan.org	Letter and questionnaire via email	17 February 2017		✓
7	Community leaders of Senabah Village, Beringin Village and Semanga Village (Include Board of Cempaka Biru and Sentama Lestari Smallholders)	Sub. District of Sejangkung, District of Sambas, Province of Kalimantan Barat	-	Focus Group Discussion	20 February 2017	✓	
8	Labour union	Sub. District of Sejangkung, District of Sambas, Province of Kalimantan Barat	-	Interview	23 February 2017	✓	
9	Gender Committee	Sub. District of Sejangkung, District of Sambas, Province of Kalimantan Barat	-	Interview	23 February 2017	✓	
11	Local contractor : • CV Pulau Indah (Building contractor) • Ending Ermawati (FFB Transporter)	Sub. District of Sejangkung, District of Sambas, Province of Kalimantan Barat	-	Interview	23 February 2017	✓	

Appendix 2. Assessment Program

DATE		19 – 24 February 2017	
PLANNED TIM	ACTUAL DURATION	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Sunday, 19 February 2017			
06.00 - 07.00	06.00 - 07.00	Flight from Jakarta to Pontianak	Auditor Team
08.00 - 17.00	08.00 - 17.00	Traveling Pontianak – Plantation Area of PT AGRONUSA INVESTAMA	
Monday, 20 February 2017			
08.00 – 16.00	08.00 – 16.00	• Stakeholder Consultation to Related Agency in Sambas District	SHL
08.00 – 08.30	08.00 – 08.30	Opening Meeting <ul style="list-style-type: none">• Auditee Speech (Introduction of PIC, Profile of Mill and Estates Management Unit)• Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Determine of Field Visit Audit, Transparency and Confidentiality Clarification)	Auditor Team & MR of PT Agronusa Investama
09.00 – 12.00	09.00 – 12.00	<ul style="list-style-type: none">• Review of Previous Visit Non-conformance (ASA 02)• Document Verification• Basic Information• Occupational Health & Safety Aspect (PPE Used in Harvest, Manure & Pesticide Application) and Worker Welfare• Agronomy (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application)• Environmental/Conservation Aspect (Inspection of HCV Identified Area, Riparian/Waterways Zone, Reservoir, Forest Area, Peat Area (Water management, etc)• Legal Demarcation Aspect (Inspection of Legal Boundary Stones, Community Buffer Area/Enclave)• Worker's Facilities Aspect (Housing, Daycare, Sports Facilities, Employees Meeting Hall, Sanitary Facilities) & (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management)	ORN, MRD, AAS MRD MRD MRD SHL ORN AAS
10.00 – 12.00	10.00 – 12.00	• Stakeholder consultation (Community surround)	ORN, AAS
12.00 – 14.00	12.00 – 14.00	BREAK	
14.00 – 17.00	14.00 – 17.00	Continuing of Document Verification	ORN, MRD, AAS
Tuesday, 21 February 2017			
08.00 – 12.00	08.00 – 12.00	Field Observation : <i>Senabah Division</i> <ul style="list-style-type: none">• Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application)• Implementation of Environmental, Conservation and Waste Management Aspect (Domestic Waste Management, Fire Control Facilities and HCV Area).• Implementation of Legal Aspect (Land Ownership, Legal Boundaries)• Implementation of Social Aspect (Communication and Transparency, Procedure and Mechanism of Complaint and Grievance)• Implementation of Occupational Health & Safety Aspect	MRD SHL ORN AAS AAS

DATE		19 – 24 February 2017	
PLANNED TIM	ACTUAL DURATION	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
		<ul style="list-style-type: none"> Observation of Workers Facilities (Housing, School, Worship Place, Clinic, etc). 	
12.00 – 14.00	12.00 – 14.00	BREAK	
14.00 – 16.00	14.00 – 16.00	Field Observation to ANI Sambas POM <ul style="list-style-type: none"> Supply Chain verification FFB Receiving, Weighbridge, FFB Sorting, Processing Activity, Despatch CPO) Environmental , Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, POME Pond) Occupational Health & Safety Aspect, Interview with Worker's Union Mill, Local Contractor, Gender Committee 	ORN ORN / MRD SHL MRD / AAS
16.00 – 17.00	16.00 – 17.00	Field Observation Clarification	
Wednesday, 22 February 2017			
08.00 - 12.00	08.00 - 12.00	Field Observation: <i>Kumpai Division</i> <ul style="list-style-type: none"> Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Implementation of Environmental, Conservation and Waste Management Aspect (Domestic Waste Management, Fire Control Facilities and HCV Area). Implementation of Legal Aspect (Land Ownership, Legal Boundaries) Implementation of Social Aspect (Communication and Transparency, Procedure and Mechanism of Complaint and Grievance) Implementation of Occupational Health & Safety Aspect Observation of Workers Facilities (Housing, School, Worship Place, Clinic, etc). 	MRD SHL ORN AAS AAS
12.00 – 14.00	12.00 – 14.00	BREAK	
14.00 – 17.00	14.00 – 17.00	• Completing of Check List	Auditor Team
Thursday, 23 February 2017			
08.00 – 12.00	08.00 – 12.00	Field Observation: <i>Smallholder area</i> <ul style="list-style-type: none"> Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Implementation of Environmental, Conservation and Waste Management Aspect (Domestic Waste Management, Fire Control Facilities and HCV Area). Implementation of Legal Aspect (Land Ownership, Legal Boundaries) Implementation of Social Aspect (Communication and Transparency, Procedure and Mechanism of Complaint and Grievance) Implementation of Occupational Health & Safety Aspect Observation of Workers Facilities (Housing, School, Worship Place, Clinic, etc). 	MRD SHL ORN AAS AAS
12.00 – 13.00	12.00 – 13.00	BREAK	
13.00 -16.30	13.00 -16.30	Team Auditor Meeting (Preparation for Audit Conclusion)	Auditor Team
16.30 -18.00	16.30 -18.00	Closing Meeting	Auditor Team & MR of

DATE		19 – 24 February 2017	
PLANNED TIM	ACTUAL DURATION	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
			PT Agronusa Investama
Friday, 24 February 2017			
07.00 – 15.00	07.00 – 15.00	Traveling from Plantation Area to Pontianak	Auditor Team
17.45 – 19.45	17.45 – 19.45	Flight from Pontianak to Jakarta	