

**Roundtable on Sustainable Palm Oil Certification
R S P O**

Stage-1 Stage-2 Surveillance Re-Certification

Name of Management Organisation : Lembiru Palm Oil Mill, PT Sandika Natapalma subsidiary of Sime Darby Plantation Bhd

Plantation Name : Lembiru Estates and Awatan Estate

Location : Village of Awatan, Sub District of Marau, District of Ketapang Province of Kalimantan Barat, Indonesia

Certificate Code : **MUTU-RSPO/044**

Date of Certificate Issue : 03 July 2014

Date of License Issue : 03 July 2018

Date of Certificate Expiry : 02 July 2019

Date of License Expiry : 02 July 2019

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-4	14 to 17 May 2018	Leonada (Lead Auditor), Sofyan Hadi Lubis, Satria Adi Putra, Steve Mualim	Octo H.P.N. Nainggolan	Ardiansyah

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-4	04 September 2018

TABLE OF CONTENT

FIGURE

Figure 1. Location Map of PT Sandika Natapalma	01
Figure 2. Operational Map of PT Sandika Natapalma	02

Abbreviations Used	03
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1.0 SCOPE of the CERTIFICATION ASSESSMENT

1.1 Assessment Standard Used	05
1.2 Organisation Information	05
1.3 Type of Assessment	05
1.4 Location of Mill and Plantations	05
1.5 Description of Area Statement	06
1.6 Planting Year and Cycles	06
1.7 Description of Mill and Supply Base	06
1.8 Estimate Tonnage of Certified Product	07
1.9 Other Certifications	08
1.10 Time-Bound Plan	08

2.0 ASSESSMENT PROCESS

2.1 Assessment Team	18
2.2 Assessment Methodology, Assessment Process and Locations of Assessment	18
2.3 Stakeholder Consultation and Stakeholders Contacted	21
2.4 Determining Next Assessment	21

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification	22
3.2 Summary of Assessment Report of Supply Chain Requirement	49
3.3 Conformity Checklist of Certificate and Logo Use	65
3.4 Summary of RSPO Partial Certification	66
3.5 Identification of Findings, Corrective Actions, Observations, Opportunity for Improvement and Noteworthy Positive Components	69
3.6 Summary of Arising Issues from Public, Management and Auditor Responses	100

4.0 CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY

4.1 Formal Signing of Assessment Findings	103
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APPENDICES

1. List of Stakeholders Contacted in the RSPO Certification Process	104
2. Assessment Program	106

Figure 1. Location Map of PT Sandika Natapalma

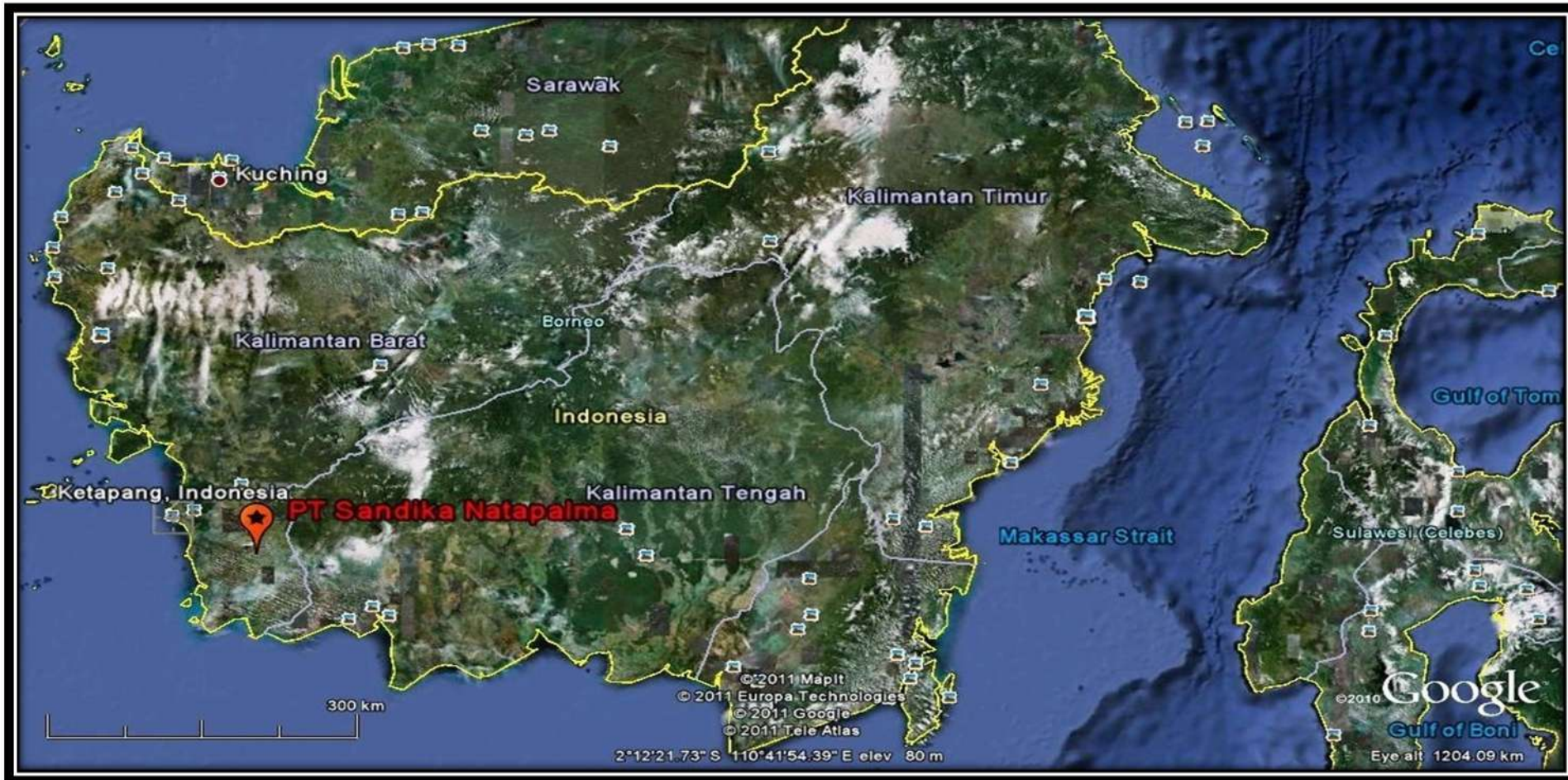
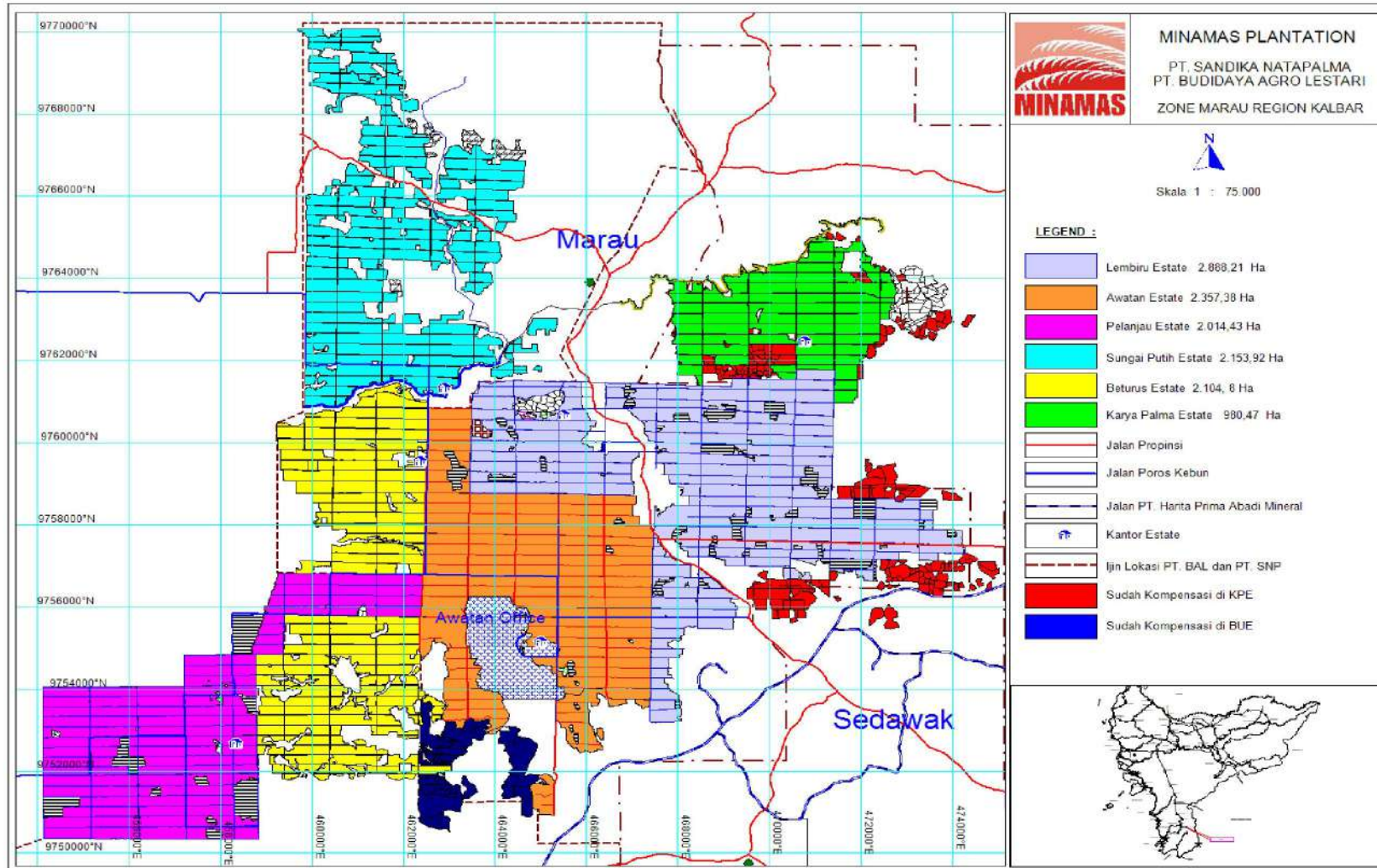


Figure 2. Operational Map of PT Sandika Natapalma



Abbreviations Used

AMDAL	: Analisis Mengenai Dampak Lingkungan (<i>Social and Environmental Impact Assessment</i>)
ASA	: Annual Surveillance Assessment
APD	: Alat Pelindung Diri (<i>Personal Protective Equipment</i>)
AWE	: Awatan Estate
BAL	: Budidaya Agro Lestari
BOD	: Biological Oxygen Demand
BPJS	: <i>Badan Penyelenggara Jaminan Sosial</i> (Social Insurance Agency)
BPN	: Badan Pertanahan Nasional (<i>National Land Agency</i>)
BSS	: Block Spraying System
CB	: Certification Body
CSR	: Corporate Social Responsibility
CD	: Community Development
CH	: Certificate Holder
COD	: Chemical Oxygen Demand
CPO	: Crude Palm Oil
DPLH	: Environment Management Document
EFB	: Empty Fruit Bunch
EHS	: Environment Health and Safety
EIA	: Environmental Impact Assessment
EWS	: Early warning system
FFB	: Fresh Fruit Bunches
FPIC	: Free Prior and Informed Consent
GHG	: Green House Gases
GM	: General Manager
HCV	: High Conservation Value
HGU	: Hak Guna Usaha. (<i>Land Use Permit</i>)
HIRAC	: Hazard Identification Risk Assessment and Risk Control
IPM	: Integrated Pest Management
KER	: Kernel Extarction Rate
KUD	: <i>Koperasi Unit Desa</i> (Village Unit Cooperatives)
LD50	: <i>Lethal Dose 50</i>
LUCA	: Land Use Change Analysis
MA	: Mill Advisory
MRC	: Minamas Research Centre
MSDS	: Materia Safety Data Sheet
MRA	: Manual Referensi Agronomi
NGO	: Non-Government Organizations

OER	:	Oil Extraction Rate
OFI	:	Opportunity of Improvement
OHS	:	Occupational Health and safety
P2K3	:	<i>Panitia Pembina Keselamatan dan Kesehatan Kerja</i> (Occupational Safety and Health Committee)
PA	:	Plantation Advisory
PIC	:	Person in Charge
PK	:	Palm Kernel
POM	:	Palm Oil Mill
POME	:	Palm oil mill effluent
PPE	:	Personal Protection Equipment
PSD	:	Plantation Services Departement
PSQM	:	Plantation Sustainability and Quality Management
PT	:	Perseroan Terbatas
RACP	:	Remediation and Compensation Plan
RKL	:	<i>Rencana kelola lingkungan</i> (Environment Management Plan)
RPL	:	<i>Rencana pemantauan lingkungan</i> (Environment Monitoring Plan)
RSPO	:	<i>Roundtable on Sustainable Palm Oil</i>
RTE	:	Rare, Threatened or Endangered
SCCS	:	Supply Chain Certification Standard
SGM	:	Senior General Manager
SIA	:	Social Impact Assessment
SEIA	:	Social Environment Impact Analysis
SNP	:	Sandika Natapalma
SOP	:	Standart Operational and Procedure
WTP	:	Water Treatment Plant
WWTP	:	Waste Water Treatment Plant

1.0	SCOPE of the CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used	<ul style="list-style-type: none"> • <i>Indonesian Nasional Interpretasi Prinsip dan Kriteria RSPO 2013 Untuk Indonesia Juli 2016, approved RSPO Governors 30 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 revised on 14 June 2017 (Module D / E for CPO Mill)</i> 	
1.2	Organisation Information		
1.2.1	Organisation name listed in the certificate	PT SANDIKA NATAPALMA subsidiary of SIME DARBY Plantation Bhd	
1.2.2	Contact person	Mohamad Pirabaharan	
1.2.3	Organisation address and site address	RSPO registered company: No 2, Plantation Tower Jalan PJU 1A/7 Petaling Jaya, Malaysia 47301 Liaison Office: The Plaza Office Tower, 36 th Floor, Jl. M. H. Thamrin Kav. 28-30, Jakarta 10350	
1.2.4	Telephone	+62-21-29926000	
1.2.5	Fax	+62-21-29922686	
1.2.6	E-mail	mohamad.pirabaharan@simedarby.com	
1.2.7	Web page address	www.simedarby.com	
1.2.8	Management Representative who completed the application for certification	Mohamad Pirabaharan (Head of PSQM Plantation)	
1.2.9	Registered as RSPO member	1-0008-04-000-00, 7 September 2004	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Palm Oil Mill and supply base • Lembiru Mill, Lembiru Estate, Awatan Estate	
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
	Lembiru	Village of Awatan, Sub District of Marau, District of Ketapang Province of Kalimantan Barat, Indonesia	S 2°10' 08" E 110° 40' 26"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			Latitude Longitude

	Lembiru Estate	Village of Awatan, Sub District of Marau, District of Ketapang Province of Kalimantan Barat, Indonesia	S 02° 09' 53.28"	E 110° 41' 16.35"
	Awatan Estate	Village of Awatan, Sub District of Marau, District of Ketapang Province of Kalimantan Barat, Indonesia	S 02° 12' 55.02"	E 110° 40' 55.00"
1.5	Description of Area Statement			
1.5.1	Tenure			
	• State		8,406.28	Ha
	• Community		-	Ha
1.5.2	Area Statement			
	• Total area		8,406.28	Ha
	• Mature area		4,751.98	Ha
	• Immature area		474.58	Ha
	• Mill		14.29	Ha
	• Emplishment / Workers Quarter		16.45	Ha
	• Infrastructure (Road & Bridges)		210.57	Ha
	• Occupation		1,227.50	Ha
	• Others area (reservoir, water bodies & enclave)		1,038.08	Ha
	• HCV		615.67	Ha
	• Reserved Area		57.16	Ha
1.6	Planting Year and Cycles			
1.6.1	Age profile of planting year			
	Planting Year	Hectarage (Ha)		
		Lembiru	Awatan	Total
	1997	367.51	374.07	741.58
	1998	143.85	1,754.40	1,898.25
	1999	954.54	-	954.54
	2001	1,157.61	-	1,157.61
	Sub Total Mature Area	2,623.51	2,128.47	4,751.98
	2015	-	22.37	22.37
	2016	-	76.00	76.00
	2017	-	67.23	67.23
	Replanting	246.84	62.14	308.98
	Sub Total Immature Area	246.84	227.74	474.58
	TOTAL	2,870.35	2,356.21	5,226.56
1.6.2	New Planting area after January 2010		-	Ha
1.6.3	Planting Cycle		1 st and 2 nd 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 (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)
	Lembiru	45	177,504.21	38,849.01	21.88	8,615.70	4.85
	<i>*Production data source from May 2017 to April 2018</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)	%
	Lembiru Estate	4,929.29	2,870.35	44,304.73	15.44	44,304.73	100
	Awatan Estate	3,476.99	2,356.21	32,122.58	13.63	32,122.58	100
	TOTAL	8,406.28	5,226.56	76,427.31	14.62	76,427.31	100
	<i>*Production data source from May 2017 to April 2018</i>						
1.7.3	FFB description from other source						
	Name of sources/Organisation (RSPO certified / non-certified)	Type of Organisation	number of smallholders	Production Area (Ha)	Supplied to Mill		
					FFB (tonnes/year)		
	Pelanjau Estate non HGU (RSPO non-certified)	PT Budidaya Agro Lestari (Sime Darby Plantation, Bhd)	-	2,227.42	33,428.47		
	Sungai Putih (RSPO non-certified)		1,375	2,437.10	32,077.72		
	Beturus Estate (RSPO non-certified)		-	3,652.31	24,475.23		
	Karya Palma Estate (RSPO non-certified)	PT Sandika Natapalma (outside scope of certification)	-	3,912.00	10,857.28		
	PT Andes Agro Investama (RSPO non-certified)	Cargil Group	-	-	238.20		
	TOTAL					101,076.90	
	<i>*Production data source from May 2017 to April 2018</i>						
1.7.4	Product categories			FFB, CPO, PK			
1.8	Tonnage of Product						
1.8.1	Past Annual Claim Certified Product			Actual certified product May 2017 to April 2018 (tonnes/year)			
	• FFB Process			76,427.31			
	• CPO Production			17,273.75			
	• Palm Kernel (PK) Production			3,812,00			
1.8.2	Product selling						
	Tonnage of selling product			Period of actual selling product May 2017 to April 2018			
	• CSPO sold as RSPO certified product			-			
	• CSPK sold as RSPO certified product			3,377.39			

	<ul style="list-style-type: none"> • CSPO sold under other scheme • CSPK sold under other scheme • CSPO sold as conventional • CSPK sold as conventional 	-	-	16,548.43	-			
1.8.3	Estimate of Certified FFB Claim							
	Name of Estate(s)	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)			
	Lembiru Estate	4,929.29	2,870.35	40,702	14.18			
	Awatan Estate	3,476.99	2,356.21	29,332	12.44			
	TOTAL	8,406.28	5,226.56	70,034	13.39			
	<i>*Projected FFB production from 03 July 2018 to 02 July 2019</i>							
1.8.4	Estimate of Certified Palm Product Claim							
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel		Supply Chain Module
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)	
	Lembiru POM	45	70,034	15,358	21.93	3,404	4.86	MB
	<i>*Projected FFB production from 03 July 2018 to 02 July 2019</i>							
1.9	Other Certifications							
	ISO 9001:2008			-				
	ISO 14001: 2004			-				
	OHSAS 18001:2007			-				
	ISCC			-				
	Others			ISPO (Indonesian Sustainable Palm Oil) – Certificate MUTU-ISPO/072 issued by Mutuagung on 06 December 2016 to 05 December 2021				
1.10	Time Bound Plan							
1.10.1	Sime Darby Plantation Sdn Bhd Time Bound Plan.							
	Management Unit		Supply Base	Time Bound Plan	HGU on Process		Location	Status
	Mill	Time Bound Plan			Ha	Time Bound Plan		
	INDONESIA							
	Sekunyir. PT. Indotruba Tengah	2010	Sekunyir	2010			Seruyan and West Kotawaringin District – Central Kalimantan	Certified
			Seruyan	2010				Certified
	Manggala. PT. Tunggal Mitra Plantations	2010	Manggala 1	2010			Rokan Hilir District – Riau	Certified
			Manggala 2	2010				Certified
			Manggala 3	2010				Certified
	Bukit	2010	West	2010	1,652	2019	Sanggau District	Certified

Ajong PT. Sime Indo Agro		East	2010			-West Kalimantan	Certified
		Sei Mawang	2018				-
		East Plasma	2010				Certified
		West Plasma	2010				Certified
Teluk Siak. PT Aneka Inti Persada	2011	Teluk Siak	2011	421.31	2020	Pekanbaru, Siak District – Riau	Certified
		Pinang Sebatang	2011				Certified
		Aneka Persada	2011				Certified
Sungai Pinang. PT. Bina Sains Cemerlang	2012	Sungai Pinang	2012	308.25	2020	Musi Rawas District – South Sumatera	Certified
		Bukit Pinang	2012				Certified
Pemantangan. PT. Teguh Sempurna	2011	Pemantangan	2011			Seruyan and East Kotawaringin District – Central Kalimantan	Certified
		Kawan Batu	2011				Certified
		Hatan Tiring	2011				Certified
		Batang Garing	2011				Certified
Alur Dumai. PT Lahan Tani Sakti	2011	Alur Dumai	2011			Rokan Hilir District – Riau	Certified
Teluk Bakau. PT. Bhumireksa Nusa Sejati	2011	Teluk Bakau	2011			Indra Giri Hilir District – Riau	Certified
		Nusa Perkasa	2011				Certified
		Nusa Lestari	2011				Certified
Mandah PT. Bhumireksa Nusa Sejati	2014	Mandah	2011			Indra Giri Hilir District – Riau	Certified
		Rotan Semelur	2011				Certified
Angsana Mini*) PT Sajang Heulang	2011	KKPA-1 PT.SHE	2013			Tanah Bumbu District – South Kalimantan	Certified
		Pantai Bonati	2011				Certified
Angsana. PT Ladangrupun Suburabadi	2011	Angsana	2011			Tanah Bumbu District – South Kalimantan	Certified
		Gunung Sari	2011				Certified
		KKPA-4 PT.SHE	2013				Certified
Mustika. PT Sajang Heulang	2013	Mustika				Tanah Bumbu District – South Kalimantan	Certified
		KKPA-2 PT.SHE	2013				Certified
		KKPA-3 PT.SHE	2013				Certified
		KKPA-5 PT.SHE	2013				Certified
		SAP 1	2020				ST-2

Gunung Aru. PT Bersama Sejahtera Sakti	2011	Gunung Aru	2011	765	2020	Kotabaru District – Kalimantan South	Certified
		Gunung Kemasam	2011				Certified
		Laut Timur	2011				Certified
		Pantai Timur	2011				Certified
		KKPA BSS	2020				-
Bebunga. PT. Langgen Muarama kmur	2011	Sungai Cengal	2011	1,162	2020	Kotabaru District – Kalimantan South	Certified
		Bebunga	2011				Certified
		KKPA Sungai Cengal	2014				Certified
Sukamandang PT Kridatama Lancar	2011	Sukamandang	2011			Seruyan and East Kotawaringin District – Central Kalimantan	Certified
		Sapiri	2011				Certified
		Barasdanum	2011				Certified
		Kuala Kuayan	2011				Certified
Pondok Labu. PT Paripurna Swakarsa	2012	Binturung	2012	1,120	2020	Kotabaru District – Kalimantan South	Certified
		Pondok Labu	2012				Certified
		Rampa	2012				Certified
		Sesulung	2012				Certified
Selabak *) PT Swadaya Andhika	2012	Selabak	2012	63	2020	Kotabaru District – Kalimantan South	Certified
		Randi	2012				Certified
		Sangkoh	2012				Certified
		Lanting	2012				Certified
Rantau. PT Laguna Mandiri	2012	Rantau	2012			Kotabaru District – Kalimantan South	Certified
		Matalok	2012				Certified
Betung. PT Laguna Mandiri	2014	Betung	2012			Kotabaru District – Kalimantan South	Certified
		Sekayu	2012				Certified
Ungkaya. PT Tamaco Graha Krida	2012	Ungkaya	2012			Morowali District – Sulawesi Tengah	Certified
		Plasma TGK	2015				Certified
Ladang Panjang. PT Bahari Gembira Ria	2012	Ladang Panjang	2012	1,639	2020	Muaro Jambi District - Jambi	Certified
		Plasma BGR	2020				-
Rantau Panjang. PT Guthrie Pecconina	2012	Rantau Panjang	2012	4,133	2020	Musi Banyuasin District – South Sumatera	Certified
		Bumi Ayu	2012				Certified
		Karang Ringin	2012				Certified
		Napal	2012				Certified
		Mangun Jaya	2012				Certified

Indonesia		Sungai Jernih Estate and GPI KKPA	2017				-
Blang Simpo. PT Perkasa Subur Sakti	2013	Tamiang (PT PPP)	2013	1,286	2020	Aceh Tamiang and East Aceh District – Nanggroe Aceh Darussalam	Certified
		Batang Ara (PT PSK)	2013				Certified
		Blang Simpo-01	2013				Certified
		Blang Simpo-02	2013				Certified
MAS. PT Mitra Austral Sejahtera	2020	MAS 1	2018			Sanggau District – West Kalimantan	-
		MAS 1	2018				-
		MAS 1	2018				-
		Plasma MAS	2020				-
Lembiru. PT Sandika Nata Palma	2014	Lembiru	2014			Ketapang District – West Kalimantan	Certified
		Awatan	2014				Certified
		Karya Palma	2018				-
		KKPA SNP	2020				-
		Pelanjau (PT BAL)	2018				-
		Sungai Putih (PT BAL)	2018				-
		Baturus (PT BAL)	2018				-
		KKPA BAL	2020				-
MALAYSIA							
Sg Dingin SOU 1	2010	Bukit Hijau	2010			Kerangan, Kedah	Certified
		Padang Buluh	2010				Certified
		Bukit Selangor	2010				Certified
		Sg Dingin	2010				Certified
		Jentayu	2010				Certified
		Anak Kuli	2010				Certified
		Somme	2010				Certified
Chersonese SOU 2	2011	Chersonese	2011			Kuala Kurau, Perak	Certified
		Holyrood	2011				Certified
		Kalumpong	2011				Certified
		Tali Ayer	2011				Certified
Elphil SOU 3	2011	Kinta Kellas	2011			Sg Siput, Perak	Certified
		Elphil	2011				Certified
		Kamuning	2011				Certified
Flemington SOU 4	2011	Flemington	2011			Teluk Intan, Perak	Certified
		Bagan Datoh	2011				Certified
		Sabak Bernam	2011				Certified
		Sg Samak	2011				Certified
Seri Intan SOU 5	2011	Seri Intan (Main Division)	2011			Teluk Intan, Perak	Certified
		Sabrang	2011				Certified
		Sg Wangi	2011				Certified
		Sogomana (Main Division)	2011				Certified
Selaba SOU 5	2011	Seri Intan (Selaba Division)	2011			Teluk Intan, Perak	Certified
		Sogomana (Cashwood & Sg	2011				Certified

		Beruas Division)					
		Bikam	2011				Certified
		Clumy	2011				Certified
Tennamaram SOU 6	2011	Tennamaram	2011			Bestari Jaya, Selangor	Certified
		Sungei Buloh	2011				Certified
		Bkt Talang	2011				Certified
Bkt Kerayong SOU 7	2011	Bkt Kerayong	2011			Kapar, Selangor	Certified
		Bkt Cherakah	2011				Certified
		Bkt Rajah	2011				Certified
		Bkt Lagong	2011				Certified
		Elmina	2011				Certified
East SOU 8	2010	East	2010			Carey Island, Selangor	Certified
		Dusun Durian	2010				Certified
		Sepang	2010				Certified
West - SOU 9	2010	West	2010			Carey Island, Selangor	Certified
Bukit Putri - SOU 10	2011	Bukit Putri	2011			Raub, Pahang	Certified
Kerdau SOU 11	2011	Kerdau	2011			Temerloh, Pahang	Certified
		Jentar	2011				Certified
		Mentakab	2011				Certified
		Sg Mai	2011				Certified
		Chenor	2011				Certified
Jabor - SOU 12	2011	Jabor	2011			Kuantan, Pahang	Certified
Labu SOU 13	2011	Labu	2011			Nilai, Negeri Sembilan	Certified
		New Labu	2011				Certified
		Bradwall	2011				Certified
Tanah Merah SOU 14	2010	Tanah Merah	2010			Port Dickson, Negeri Sembilan	Certified
		Sua Betong	2010				Certified
		Bukit Pelandok	2010				Certified
Sua Betong SOU 15	2014	Salak	2014			Port Dickson, Negeri Sembilan	Certified
		Sengkang	2014				Certified
		Siliau	2014				Certified
		PD Lukut	2014				Certified
		Sungai Baru	2014				Certified
		Tampin Linggi	2014				Certified
Kok Foh SOU 16	2011	Bukit Pilah	2011			Bahau, Negeri Sembilan	Certified
		Kok Foh	2011				Certified
		Muar River	2011				Certified
		St. Helier	2011				Certified
		Pertang	2011				Certified
		Sg Gemas	2011				Certified
		Sg Sebalang	2011				Certified
		Sg Senarut	2011				Certified
Kempas SOU 17	2010	Kempas	2010			Jasin, Melaka	Certified
		Kemuning	2010				Certified

		Tangkah	2010				Certified
Diamond Jubilee SOU 18	2011	Bukit Asahan	2011			Jasin, Melaka	Certified
		Diamond Jubilee	2011				Certified
		Serkam	2011				Certified
Pagoh SOU 19	2014	Pagoh	2014			Muar, Johor	Certified
		Lanadron	2014				Certified
		Pengkalan Bukit	2014				Certified
		Welch	2014				Certified
Chaah SOU 20	2010	North Labis	2010			Chaah, Johor	Certified
		Cha'ah	2010				Certified
		Sg Simpang Kiri	2010				Certified
Gunung Mas SOU 21	2010	Gunung Mas	2010			Kluang, Johor	Certified
		Kempas Klebang	2010				Certified
		Bukit Paloh	2010				Certified
		Yong Peng	2010				Certified
Bukit Benut SOU 22	2011	Bukit Benut	2011			Kluang, Johor	Certified
		CEP Niyor	2011				Certified
		Lambak / Elaeis	2011				Certified
Ulu Remis SOU 23	2011	Pekan	2011			Layang-layang, Johor	Certified
		Sembrong	2011				Certified
		Tun Dr. Ismail	2011				Certified
		Ulu Remis	2011				Certified
		Bukit Badak	2011				Certified
		Cenas	2011				Certified
Hadapan SOU 24	2011	CEP Rengam	2011			Layang-layang, Johor	Certified
		Kulai	2011				Certified
		Layang	2011				Certified
		Seri Pulai	2011				Certified
Sandakan Bay SOU 26	2008	Tun Tan Siew Sin	2008			Sandakan, Sabah	Certified
		Tunku	2008				Certified
		Tigowis	2008				Certified
		Sentosa	2008				Certified
		Saguliud	2008				Certified
Melalap SOU 27	2011	Melalap	2011			Tenom, Sabah	Certified
		Sapong	2011				Certified
Binuang SOU 28	2009	Tingkayu	2009			Kunak, Sabah	Certified
		Sungang	2009				Certified
		Jelata Bumi	2009				Certified
		Binuang	2009				Certified
Giram SOU 29	2009	Mostyn	2009			Kunak, Sabah	Certified
		Giram	2009				Certified
Merotai SOU 30	2009	Imam	2009			Tawau, Sabah	Certified
		Merotai	2009				Certified
		Table	2009				Certified
		Tiger	2009				Certified
Lavang SOU 31	2011	Belian	2011			Bintulu, Serawak	Certified
		Kelida	2011				Certified

		Lavang	2011				Certified
		Lavang (SE)	2011				Certified
		Rasan	2011				Certified
Rajawali SOU 32	2011	Rajawali	2011			Bintulu, Serawak	Certified
		Samudera	2011				Certified
		Semarak	2011				Certified
		Bayu	2011				Certified
Derawan SOU 33	2011	Takau	2011			Bintulu, Serawak	Certified
		Damai	2011				Certified
		Derawan	2011				Certified
		Sahua	2011				Certified
Pekaka SOU 34	2011	Chartquest	2011			Bintulu, Serawak	Certified
		Dulang	2011				Certified
		Peroh	2011				Certified
		Pekaka	2011				Certified
		Ruai	2011				Certified
LIBERIA							
Grand Cape Mount	2017	Matambo (2,500 Ha)	2017			Grand Cape Mount, Liberia	NPP May 2011
		Grand Cape Mount (2,372 Ha)	2017				NPP May 2011
		Zodua (264)	2017				NPP May 2011
		Bomi (3,128 Ha)	2017			Bomi, Liberia	NPP May 2011
		Lofa (2,254 Ha)	2017				NPP May 2011
P & G (New Britain Palm Oil)							
Poliamba	2012	Kara	2012			Kevieng, New Ireland Province, P&G	Certified
		West Coast	2012				Certified
		Nalik	2012				Certified
		Noatsi	2012				Certified
		Madak	2012				Certified
		North (Smallholders)	2012				Certified
		South (Smallholders)	2012				Certified
		West (Smallholders)	2012				Certified
Tetere	2011	Tetere	2011			Gudaicanal, Solomon Island	Certified
		Ngalimbiu	2011				Certified
		Mbalisuna	2011				Certified
		West Zone (Smallholders)	2011				Certified
		Central Zone (Smallholders)	2011				Certified
		MBA East	2011				Certified

		(Smallholders)					
		MBA West (Smallholders)	2011				Certified
Sangara, Sambiripa & Mamba	2013	Sangara	2013			Higaturu, Popondetta, Oro, P&G	Certified
		Sumberipa	2013				Certified
		Ambogo	2013				Certified
		Embi	2013				Certified
		Mamba	2013				Certified
		Sorovi (smallholders)	2013				Certified
		Igora (smallholders)	2013				Certified
		Saiho (smallholders)	2013				Certified
		Aeka (smallholders)	2013				Certified
		Ilimo (smallholders)	2013				Certified
		Gusap	2010	Dumpu	2010		
Surinam	2010					Certified	
Jephcott	2010					Certified	
Gusap	2010					Certified	
Paddock	2010					Certified	
Ngaru	2010					Certified	
Madang VOP (smallholders)	2010					Certified	
Morobe VOP (smallholders)	2010					Certified	
Hagita	2013	Giligili	2013			Milne Bay, P&G	Certified
		Hagita	2013				Certified
		Waigani	2013				Certified
		Sagarai	2013				Certified
		Padipadi	2013				Certified
		Mariawatte	2013				Certified
		East Gurney	2013				Certified
		West Gurney	2013				Certified
		East Sagarai	2013				Certified
		West Sagarai	2013				Certified
		<ul style="list-style-type: none"> • Mosa • Kumbango • Kapiura • Namumdo • Waraston 	2008	Bebere	2008		
Kumbango	2008					Certified	
Togulo	2008					Certified	
Dami	2008					Certified	
Waisisi	2008					Certified	
Kautu	2008					Certified	
Karaisu	2008					Certified	
Moroa	2008			Certified			

		Bilomi	2008		Certified
		Loata	2008		Certified
		Haella	2008		Certified
		Garu	2008		Certified
		Daliavu	2008		Certified
		Sapuri	2008		Certified
		Malilimi	2008		Certified
		Rigula	2008		Certified
		Nomundo	2008		Certified
		Navarai / Karato ME	2008		Certified
		Volupai . Lotomgam / Natupi / Goruru	2008		Certified
		Lolokoru	2008		Certified
		Silovoti	2008		Certified
		LSS Hoskin (1,877 Smallholders)	2008		Certified
		VOP East (1,815 Smallholders)	2008		Certified
		VOP Central (1,958 Smallholders)	2008		Certified
		VOP West (1,277 Smallholders)Kaulong / Akamie / Pusiki / Repamira / Sakapei / KDC ME (21 large smallholders)	2008		Certified
		LSS Kapiura (847 Smallholders)	2008		Certified
		VOP Kapiura (551 Smallholders)	2008		Certified
	<p>Sime Darby has achieved 34 management units in Malaysia, 24 management units in Indonesia, 10 management units in Liberia that RSPO certified. Total management unit in Sime Darby Plantation Sdn Bhd are 34 in Malaysia, 25 in Indonesia and 10 in Liberia. In the year of 2017 there are two Mill that are no longer operating, and for the supplying base (Estate) is diverted to a mill that is still operating and has been certified RSPO.</p> <p>A new mill will be set up in Liberia and planned for commissioning in February 2016. Preparation to undergo the RSPO Certification process is in progress and Sime Darby Plantation Sdn Bhd targets to undergo RSPO Certification by end 2017. RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps is in progress.</p> <p>There was change of the Time Bound Plan under Sime Darby on 15 April 2016 cause the Sime Darby postpone the others certification process. Change of the Time Bound Plan explanation: PT Mitra Austral Sejahtera. There are social issue still unresolved from the Serikat Petani Kelapa Sawit (SPKS) Sanggau, however the improvement are in progress.Sime Darby has informed the Time Bound Plan progress, MUTU has consider that Sime Darby still comply with the RSPO requirement for partial certification.</p>				
1.10.2	Progress of Associated Smallholders and Outgrowers for Certifiable Standard				
	<p>PT. Budidaya Agro Lestari as subsidiary of Sime Darby Plantation Bhd has associated smallholder (Plasma Sungai Putih) which the FFB's are sent to Lembiru POM, PT Sandika Nata Palma subsidiary of Sime Darby Plantation Bhd. The RSPO certification progress of Plasma Sungai Putih is has conducted initial assessment on May 2018.</p>				

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-4	<p>1. Leonada (Lead Auditor). Bachelor of Agricultural Cultivation Department of Agriculture, Faculty of Agriculture, Department of Plant Breeding and Seed Technology, Bogor Agricultural University. Having experience of more than five years working as a plantation operations staff and Sustainability in the company private Indonesian oil palm plantations and is currently working on independent certification bodies as auditor. Training have been followed are: Auditor Training Indonesian Sustainable Palm Oil (ISPO), Training of RSPO lead auditor, ISO 17021; 2011, ISO 17065; 2012, ISO 19011; 2011, Lead Auditor ISO 9001; 2008, ISO 14001; 2005, Training Management Development Program Agronomy, training analysis base solution for operation, training integrated Pest Management (IPM), training Use of limited Pesticides, Training Management of Waste Pesticides and Fertilizers, training mediation and conflict resolution, general safety specialist training General specialist and Health and safety management system (SMK3) Auditor. In this audit He conducted an assessment on Legal, land dispute and SCCS.</p> <p>2. Sofyan Hadi Lubis (Auditor). 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 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 as an auditor. During this audit, he verified environment, conservation, and GHG aspect.</p> <p>3. Steve Mualim (Auditor). Indonesia citizen. Master of Environmental and Natural Resources Management. Has experience as Environmental management consultant (2012) and Sustainable palm oil assurance auditor since 2013. Has been attended several trainings e.g : ISCC in house training, palm oil GHG emission, HCV management, ISPO lead auditor, RSPO lead auditor, labor and human rights issues, ISO 19011, and ISO 9001:2008. Has been conducted several audits for RSPO / ISPO scheme since 2013 for best management practices, conservation, and environmental management. Fluent in bahasa and chinese mandarin. During this audit, he verify Social, workers right and transparency .</p> <p>4. Satria Adi Putra. Indonesian citizen, Diploma III majoring in Palm Oil Plantation. Have experience of work more than six years since 2009 as the operational staff of private oil palm plantations in Indonesia. Training have been followed including Occupational Health and Safety Expert, Orang Utan and Wildlife Management, ISPO Auditor Training, RSPO Awareness, IHT Potential Mapping and Conflict Resolution in Production Forests, OHSAS 18001, Lead Auditor Training for ISO 9001, ISO 14001, ISO 17021, ISO 17065, ISO 19011 and ISO 22000. In this audit activity support verification on aspect best management practices for Mill and Estate.</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 : 3 auditor & 1 trainee Number of days for ASA-4 at site: 4 days Number of working days for ASA-4 at site : 12 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. SNP 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 Revised June 2017 (Module E for CPO Mill).

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 Recertification delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase (Recertification).

Improvement of findings from surveillance 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 Locations of Assessment

ASA-4 Number of units in this certification activity is 2 (two) estates, which supply the raw material (FFB) to 1 (one) mill- Lembiru Palm Oil Mill. In conducting the assessment, the auditors team was verify all the management unit of estate and mill.

Lembiru Palm Oil Mill

1. **Weighbridge.** Observation of Supply Chain implementation
2. **Scheduled Waste Storage.** Observation related sheduled waste management and OHS aspect.
3. **WTP Station.** Observation related water consumption.
4. **Chemical Storage.** Field observations related to condition in the chemical warehouse and management of hazardous and toxic materials.
5. **Workhsop.** Observation on maintenance activities and interview with foreman related understanding of working procedure.
6. **WWTP.** Observation for POME management
7. **Grading Station.** Observation and interview with grading work related to the implementation of SOP, K3 and employment.
8. **Security Post.** Observations and interviews with security personnel related to the adoption of SOP for acceptance of fruit, OHS and manpower.
9. **Sterilizer Station.** Observation of application and interview with sterilizer operators related to SOP, K3 and employment.
10. **Kernel Stations.** Observations and interviews with kernel station operators regarding employment, occupational safety and health and defined work procedures.
11. **Engine Room.** Observations and interviews with engine room operators on employment, occupational safety and health and defined work procedures.
12. **Boiler Station.** Observations and interviews with boiler operators regarding labor, occupational safety and health and defined work procedures.

Lembiru estate

1. **HGU Pole no. 23 block G10A.** Observation of legal border
2. **HGU Pole no. 24 block G12A.** Observation of legal border
3. **HGU Pole no. 25 block H12D.** Observation of legal border

4. **Enclave area block M004.** Observation of dispute area
5. **Chemical Storage.** Field observations related to condition in the chemical warehouse and management of hazardous and toxic materials.
6. **Housing of Block Spraying System.** Field observations related storage of PPE and handling hazardous materials and toxic waste.
7. **Fertilizer Storage.** Field observations related to the condition of fertilizer warehouse.
8. **Workshop.** Observation on maintenance activities and interview with foreman related understanding of working procedure.
9. **Emplacement.** Observation about infrastructure of housing and management of waste.
10. **Landfill area.** Observation related domestic waste and sheduled waste management.
11. **Sekakai Riparan Block 9D3, Divisi II.** Observation for HCV management
12. **Harvesting & Transporting, Division III.** Observation and interviews with foremen and harvest workers related to work procedures, health insurance and labor protection, safe working practices and use of PPE.
13. **Spray Circle & Path, Division I.** Interviews of spraying mechanism, work tools, chemicals used, doses used, medical examinations, extra fooding, PPE, labor aspect and environment.
14. **Planting of Beneficial Plant (*Turnera subulata*), Division II.** Observation related to the implementation of beneficial plant for the biological control of pests.

Awatan Estate

1. **HGU Pole no. 1D block L4A.** Observation of legal border
2. **HGU Pole no. 33 block N3C.** Observation of legal border
3. **Enclave area block N3C.** Observation of dispute area
4. **Chemical Storage.** Field observations related to condition in the chemical warehouse and management of hazardous and toxic materials.
5. **Housing of Block Spraying System.** Field observations related storage of PPE and handling hazardous materials and toxic waste.
6. **Fertilizer Storage.** Field observations related to the condition of fertilizer warehouse.
7. **Workshop.** Observation on maintenance activities and interview with foreman related understanding of working procedure.
8. **Emplacement.** Observation about infrastructure of housing and management of waste.
9. **Landfill area.** Observation related domestic waste and sheduled waste management.
10. **Awatan Riparan Block J1A, Divisi III.** . Observation for HCV management
11. **Spray Circle & Path, Block J1A, Division III.** Interviews of spraying mechanism, work tools, chemicals used, doses used, medical examinations, extra fooding, PPE, labor aspect and environment.
12. **Harvesting & Transporting, Block G1A, Division I.** Observation and interviews with foremen and harvest workers related to work procedures, health insurance and labor protection, safe working practices and use of PPE.
13. **Planting of Beneficial Plant (*Turnera subulata*), Block J1C, Division 3.** Observation related to the implementation of beneficial plant for the biological control of pests.
14. **Terrace Area, Block L2C, Division III.** Observations regarding the implementation of procedures on terraces and erosion handling
15. **EFB Application Block J2C, Division III.** Observation related to waste management and nutrient cycle strategy

Stakeholders

1. **Government Agencies.** Manpower Agency, Land Agency, Plantation Agency and Environment Agency
2. **Local Community.** Head of Dusun Awatan, Sukakarya Village, Head of Dusun Sedawak, Karya Baru Village, Ketua Dewan Adat Dayak & Head of Mitra Usaha Tani Sejahtera Cooperation Plasma Sungai Putih, and Pelanjau Jaya village.
3. **Internal Stakeholder.** Heaad of Labor Union, Gender Community.

	4. Local Contractor. Replanting, FFB transportation, CPO transportation.
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 SNP was held by: <ul style="list-style-type: none"> • Public Announcement at Mutuagung website www.mutucertification.com and www.rspo.org on April 27th, 2018. • Consultation with Government Agency on 15 May 2018. • Consultation with local stakeholders (community surround/village) on 16 May 2018. • Consultation with Internal Stakeholders on 16 May 2018. • Consultation with Local Contractor on 16 May 2018
2.3.2	Stakeholder contacted
ASA-4	Please find appendix 1
2.4	Determining Next Assessment
ASA-4	The next recertification assessment shall conducted not more than 4 month before the certificate expiry (March 2019)

3.0. ASSESSMENT FINDINGS

3.1. Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Lembiru POM – PT Sandika Natapalma, SIME DARBY Plantation Sdn Bhd operation consisting of one (1) mill and two (2) oil palm estates.

During the assessment, there were nine (9) Nonconformities were assigned against Major Compliance Indicators, one (1) 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 actions that had been reviewed and accepted by Auditors in form of documentation evidences e.g. Those corrective actions taken that consist of nine (9) Major non-conformities had been closed shall be verified during next assessment.

MUTUAGUNG LESTARI found that Lembiru POM – PT Sandika Natapalma, SIME DARBY Plantation Sdn Bhd 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 Revised June 2017 (Module E for CPO Mill).

Therefore MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is continued

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.		
<p>1.1.1 From Jan-May 2018, there is no changes related to stakeholder list. The company shown the list of stakeholders updated in 2018 consisting of government agencies, local government, workers union, public figures, and related contractors. The company has develop SOP Communication and Consultation No.Policy 301/SNP-KOM-08/11. This procedures explained that the submitted suggestions will be presented by the Head Unit to the relevant departments. The response for external incoming mail not later than two weeks after the letter was received. The Personal in Charge of providing information is PSD (Plantation Service Department).</p> <p>1.1.2 The company also shown communication logbook periods 2017-2018 which describes letter date, PIC, applicant name, the institution, the request, the necessary, and the letter status. Document review shown that all of information request has been responded by company on time and interviews with related agency such as Environmental agency and manpower agency acquired information that compulsory report has been submitted for regular basis by company.</p>		
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 shown list of information for stakeholders listed on Document Control procedures SOP 301/SNP-DOC/04/15 approved by each estate manager (Lembiru, Awatan, Pelanjau, Sungai Putih, and POM). The information list includes the number of employees and a list of basic wages of employees, data of area statement, and fertilizer application data, evidence of land tenure, High Conservation Value identification report, SIA identification reports, CSR program reports, guiding committee of occupational health and safety report, and etc. The list is available at each unit and can be accessed by internal and external stakeholders. If stakeholders ask for documents apart from the list, it needs approval from top management. Based on interview with related agency, related stakeholder for examples local community, and document review shown, company has socialized information that publicly available to related stakeholders.

The company cooperates with smallholders under cooperative management (Cooperative of Perkebunan Sejahtera Palma Sejati). Contract agreement available (no. 001/KemitraanKhusus/SNP-BPS/VI/2014; No.001/Kopbun-SPS-Khusus/VI/2014). The contract are fair, legal and transparent and was signed by relevant agency. Based on interview with Cooperative Management, to date there have been no complaints regarding the price of FFB and remaining payment (debt) farmers. FFB Price refers to the price of Plantation Agency, and everything related to production, cost, remaining payment (debt) explained in the Cooperative Monthly Report and can be accessed by farmers.

Status: Comply

1.3

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

1.3.1

The company has a code of conduct policy of commitment to ethical conduct in all business operation and transaction listed on policy No 440/HRM-COC/07. The policy was approved on 2007 by Head Platation Operation and has disseminated to all workers including contractor workers in Bahasa. For example, minutes of meeting socialization on July 2016 attended by representative from awatan and lembiru estates and socialization on May 21, 2018 for related third party contractors workers attender by 10 representative. According to interviews with workers during field for example harvesters, sprayer team, boiler operator, as well as on local contractor, they already know and understand the business ethics policy.

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

Certificate holder has a list of the latest laws and regulations up dated in 2018. The lists and copies of these regulations are available in each estates and factory unit. Some examples of regulations compliance that have been done such as:

- Location Permit document No.367 Year 2008 dated 7 October 2008 for 11,300 ha
- Plantation bussines permit number 196/Mentanhut/VII/2000 dated 3 November 2000 for 8,406.21 ha and 60 Tonnes FFB/Hour for mill capacity.
- Land Use right (*Hak Guna Usaha*/HGU) number 4 Year 2000 coverage area 8,406.21 ha based on Indonesian National Land Agency Decree dated 22 February 2000 number 8/HGU/BPN/2000 and valid until 28 February 2030.
- Social Environmental Impact Analysis (SEIA) conducted in 2004 and has been approved by the *Bapedalda* of West Kalimantan Province through a letter of approval Number: 660.1 / 177 / Bapedalda-A dated May 24, 2004, with area 24,000 Ha and POM capacity of 60 Tons of FFB / Hour.
- Environmental Management Documents (DPLH) for area 2,517 Ha and have obtained Recommendation Number 660.1 / 102 / KLH-B dated March 10, 2014. The company has obtained an environmental permit based on Surat Keputusan Ketapang District No 452 / KLH-B / 2014.

- Has hazardous waste storage licensed from local government (Decision letter no. 424/KLH-B/2013, 9-12-2013). The license period is 5 year and located in the Lembiru POM.
- Have permit to utilize POM on the land (land application) with decision letter no. 673 / KLH-B / 2015, 05-10-2015). The license period is 5 year.
- The company implemented the payment of wages for employees refers to the minimum wage in accordance with Decree Kalimantan Barat Governor No 706/DISNAKERTRANS/2017 on November 2017.

The other compliances of regulations are regarding to worker regulations such as minimum wage, occupational safety and health regulations which are company hygiene & occupational health, transporting and forklift operator etc. Some operators of transporting and forklift are not being trained yet and the company has the program to provide it. This training program became opportunity for improvement (**OFI**).

2.1.2, 2.1.3 & 2.1.4

There is a system (procedur No. Policy: 301/SNP-HKM-05/11) to explains the person who responsible for managing the regulatory compliance are plantation serveices department manager and helped by the sustainability officer on site. This department also identified the law and regulation which related to the plantation operational, the list of laws and regulations were available in each unit's office (estate and Mill). The mechanism for checking regulatory compliance is done on a regular basis for each year such as March 2018.

2.1.1

Status: OFI

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

Certificate holder has had documents showing the land use right (HGU) of 8,406,21 Ha according to HGU certificate No. 4 dated 29 February 2000, location in Marau Sub District, Ketapang District West Kalimantan Province. The company has also a location permit document No.367 dated 7 October 2008 for 11,300 Ha.

2.2.2

There is a procedure of boundary maintenance (document number: 301/SNP/01/PDKK). Boundary monitoring and maintenance is done monthly such as April 2018 in Awatan Estate. Based on the boundary list document, it is known that the number of HGU boundaries in PT Sandika Natapalma is 44 poles. Based on field observation in several boundaries poles are found that all poles sampling are in a good condition and the number can read clearly. Field visit checks on estate sampling, consist of:

- Awatan Estate: pole no. 1D (block L4A) dan No. 33 (block N3C)
- Lembiru Estate: pole no. 23 (block G10A), 24 (block G12A) dan 25 (block H12D)

2.2.3, 2.2.4, 2.2.5

The Certificate Holder has the procedure of conflict resolution (RSPO/2.2/PK) and occupational land acquisition procedure (Policy No. 344/PSD-OKUP/10). There are HGU areas are still controlled by the community based on the results of field visits at Awatan Estate (Poles No. 33) and Lembiru Estate (blok M004). From the interviews with the communities (Karya Baru and Awatan Villages) are known that the area has existed when the company opened the land. Therefore, the company does not open the land in the areas that have been worked on by the community. The company then makes negotiation efforts by providing compensation in those areas. Based on consulting with communities also known that are no land dispute indicated and no significant issues of land conflict between the company and another party in surround of plantation area. The company has also conducted the process of resolving land dispute through the FPIC mechanism (FPIC documents are available in the place).

The companies effort to negotiate and compensate in those areas are became opportunity for improvement (**OFI**).

2.2.6

The Certificate Holder had Memorandum of the Chairman of SOU 13 Lembiru on 16 March 2016 No. PM/025/SPO/IV/16 on prohibition policy on the use of paramilitary in company operations. There was also a policy by Sime Darby Responsible Agriculture Charter, 2016. These policy related to prohibition of contractually army using, the main point was explained in these policy, consist of point that the company will not using of contractually army in conflict resolution and will not tolerance of anarchism in conflict resolution process. Based on field visit observation during the audit process, interview with the workers, stakeholder consultation in Karya Baru Village and Awatan Village, also consultation with related agencies in Ketapang District was known there is no indication of contractually army using plantation area of PT Sandika Natapalma.

2.2.3

Status: OFI

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, 2.3.2 & 2.3.3

Based on document verification of high conservation value identification and social impact assessment in PT Sandika Natapalma, and also stakeholder consultation in Karya Baru Village and Awatan Village, also consultation with related agencies in Ketapang District that known there is no land of the company was under of customary right. Since ASA-3 to ASA-4 period, there is no land compensation process, the compensation process has been done in the early period of plantation development. The land acquisition or compensation documentation process was filed in each estate. There are document consist of land location map, Statement of land right release by the owner, receive of payment, official letter of land compensation process was signed by related party. The related party was consist of the company representation, land owner and witnessed by head of village.

2.3.4

The process of land compensation was begun from identification and inventory of land, mapping of land location, negotiation of compensation amount, letter of land right release, official report land compensation, payment of compensation was witnessed by village and sub district head. There was shown official report of land compensation process has been signed by related party both of land owner and the company representation and witnessed by village and sub district head. For example, documentation of land compensation to community member in Batu Menang Village, Suka Karya Village, Marau Sub-district on 24 May 2013. The document was completed with minutes of meeting which and agreement between two parties after the consultation process facilitated by Suka Karya Village Head and also completed with Land location map.

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

The Company has a long-term plan contained in the Long Term Bussiness Plan document for the period 2016-2021 for PT SNP which contains such data plan as the area management plan (mature area, immature area, land clearing, cultivated land, reserve area, road, drainage, housing and other).

In addition, the company has presented the document MMCM Kalbar - Kalteng Region July 2017 to June 2018 Awatan Estate reviewing the evaluation of achievement compared with the budget that has been determined.

3.1.2

The Company already has the replanting program document listed in the Long Range Replanting Program (LRRP) report. The replanting plan in the period 2018-2021 for Awatan Estate is 1.021.07 Ha while for Lembiru Estate is an area of

1,152.84 Ha

The Company has reviewed monthly and annually replanting programs as contained in the Monthly Report which is one of the indicators related to the program and the realization of replanting for the Awatan and Lembiru Estate.

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 company has demonstrated procedures related to the activities of the estate and mill. The procedures related to the activities of the estate are listed in the SOP of Plant Operation with Document Number 110 / EST-ARM / 13, Date 16 September 2013 contains the Agronomy Reference Manual (MRA). In addition, the company has a memorandum of Head of PSQM dated 3 Sept 2015 on the supply chain system RSPO (Supply Chain Certification System).

Based on field visit and interview with labor grading at Lembiru Factory it is known that the labor has understood the procedures related to grading activities such as determining criteria of fruit, mature and overripe. In addition, the labor also explains the procedures related to the grading mechanism for fruit trucks that enter the factory.

4.1.2

The Company already has a list of SOPs listed in the SOP Documents List, which contains the document code and the name of the document. All SOPs, List Procedures and revisions of the procedures are located in Awatan Estate office, Lembiru Estate office and Lembiru Mill. Evidence of revision and maintenance of documents is contained in the Document Change form. In the document the document number is changed, the date of change and things changed. Based on the result of document review, it is known that all SOP / Procedures are written in the appropriate language (Bahasa Indonesia).

The Company has demonstrated the training program and realization for PT SNP period 2017-2018. The realization of the training include emergency response training, block spraying system training, block harvesting system training, training block manuring system, K3-Sime Card training, Safety Townhall, Integrated Pest Management Training and HCV Training.

4.1.3

The company has a company internal monitoring system that aims to monitor the operational implementation in accordance with the SOP owned by, among others, the internal audit of RSPO every year, the internal audit of the operation of estate and mill includes examination of aspects of implementation procedures / SOP and administration. In addition, there are also internal estate supervision activities such as field visits to the estate and mill conducted by the head of the company (General Manager, Manager and Staff).

4.1.4

Certificate holder has procedures in purchasing FFB from third parties (SOP/PEMB-MB-TBS/SNP/15). Certificate holder in the past year did not cooperate of FFB purchases from third parties. It's just that in April 2018 there is the acceptance of FFB from PT. Andes Agrio Investama (Cargil) amounted to 238.20 tons due to mill of PT. Andes Agro Investama was damaged. This is temporary, but the company made the basis for receiving the FFB in an agreement (SPK No. 001/FFB/AAI/IV/2018 dated 18 April 2018).

Status: Comply

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, 4.2.2

The Company demonstrates the procedures for managing soil fertility in the Minamas Plantation Agricultural Reference Manual document in the fertilization section (CHAPTER 8) which explains, among others, Unproductive Fertilization and Producing Crops, Empty Joint Application and Waste Application of Palm Oil Mill (POME).

In addition, the company also conducted soil and leaf analysis as one way to monitor soil fertility and as a basis for preparing fertilizer recommendations. This is described in the SOP for the preparation of fertilizer (No. 1-04 / MRS-SOP / 10 dated 01 April 2010).

The Company (Awatan Estate and Lembiru Estate) has shown the recording of the realization program of fertilization. The recording of Lembiru estate fertilization such as fertilization at Field 01Y14 Division 4 Kebun Lembiru using CCM 44 fertilizer in March 2018 covering 53,20 Ha.

The company has presented the document on the use of Fertilizer/Ton FFB listed in the Fertilizer Monitoring Document / Ton FFB Area Marau. The use of fertilizer/ton of FFB for the period of July 2017 - June 2018 for Awatan Estate is worth 0,060 kg of fertilizer/ton of FFB.

Based on field observation in Block J1A Kebun Awatan, it is known that workers understand related fertilization procedures such as not doing fertilization close to water bodies and fertilizing in accordance with the recommended dosage.

4.2.3

The Company has presented the Procedure with Policy No. I-04 / MRC-SOP / 10 dated April 1, 2010 concerning the Formulation of Fertilization Recommendation is known that soil sampling is done every five years and the leaf sampling is done every year.

The Company has presented Test Report on Plant Crop Analysis Year 2016-2017 Awatan Estate which become the reference in fertilization program year 2017-2018. The analysis results contain levels of Nitrogen, phosphate, cation exchange rate, potassium levels, magnesium levels, borate levels and so on. In addition, monitoring is also done visually related to physical plants, among others, identifying deficiencies in leaves.

4.2.4

The Company has demonstrated the application of energy recycling. The use of energy recycling include the use of EFB, the use of shells, fiber and POME. The utilization of recycled energy use of fiber is 1169 MT, and the use of shell is 540 MT.

Status: Comply

4.3

Practices minimize and control erosion and degradation of soils.

4.3.1

The Company has demonstrated showing the Land Survey and Land Suitability documents for oil palm crops for the period 2017-2022 which describes the land slope class (Awatan Estate scale 140.000) and geological map (Lembiru Estate scale 1: 60.000) which makes the geographic reference map. The whole map is a geographic reference map.

4.3.2

The company has presented document of Land Survey and Land Suitability for oil palm plantation period of 2017-2022 part 5 which contains management in land management such as for land having slope more than 6 ° planting system is done with terrace system and given ground cover plant. Application of organic materials (EFB) that is done around the plant to increase soil moisture, laying of stacks of midrib to form the letter U, making silt pit and planting vertiver.

Based on field trips to Block L2C Division 3 of Awatan Estate on the wave-topping area it is known that the company has implemented erosion retarding system by making the pitches on the plant line area. This has been in accordance with the technical recommendations of the Land Survey and Land Suitability for oil palm plantation period 2017-2022.

4.3.3

The Company has demonstrated the 2017-2018 Road Maintenance Plans and Realization Programs listed in the Up Keep Road document. The evaluation related to the realization of work on the program/plan, listed in the document MMCM. Based on the results of the field visit to Block J1C Division 3 of Awatan Estate, it is known that the company has conducted mechanical road maintenance activities using road graders, in general the road condition is in good condition and can be passed by FFB transport truck.

4.3.4, 4.3.5

Based on the results of field visit and document review of Land Survey Semi Detail and Land Suitability period 2017 - 2022 issued by Minamas Research Center team in March 2017 stating that peatland is not identified in PT SNP area.

4.3.6

The Company has demonstrated records of erosion monitoring monitoring such as pole No. SNP-03 with a total reduction of 1 mm and pole SNP-01 with a total reduction of 1 mm.

Based on the results of field visits on the terrace area Block L2C Division 3 of Awatan Estate is known that the company made efforts in reducing the rate of erosion by way of preparation of midrib on the edge of the terrace and not spraying on the edge of the terraces.

Status: Comply

4.4

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

4.4.1

Implementation of ground and ground water monitoring plan is documented in the RKL / RPL report, among others: conducting POME quality testing, groundwater testing, and river water quality testing.

- All POME quality testing results are in line with the standards of quality set by the government (PermenLH No. 28 / 2003). For example testing in April 2017 is known pH = 8.07, BOD = 119.67 mg/l, COD = 546.05 mg/l, Maret / 2017 diketahui pH = 8.10, BOD = 274.40 mg/l, COD = 1252.16 mg/l, dan Februari / 2017 diketahui pH = 8.00, BOD = 317.50 mg/l, COD = 1028.56 mg/l.
- All groundwater quality testing results are in line with the standards of quality set by the government. For example Desember /2017, the location of A1 is known pH = 5.07, DO = 4.74 mg/l, BOD5 = 6.90 mg/l, = COD 24.48 mg/l, TSS = 22.00 mg/l. The location of A2 pH = 6.22, DO = 5.11 mg/l, BOD5 = 10.35 mg/l, = COD 32.64 mg/l, TSS = 26.00 mg/l. The location A3 pH = 6.29, DO = 4.56 mg/l, BOD5 = 10.35 mg/l, = COD 32.64 mg/l, TSS = 20.00 mg/l.
- From 36 parameters of downstream test in Awatan river, there are 2 parameters that are not in line with the standard quality standard set by the government, are BOD5 = 4.76 mg / l (standard 3 mg / l), DO = 5.74 mg / l (standard 4 mg / l) . From 36 parameters of downstream test in Kendawang River, there are 2 parameters that are not in line with the standard quality standard set by the government, are BOD5 = 5.98 mg / l (standard 3 mg / l), DO = 6.45 mg / l (standard 4 mg / l) . This parameter is high because the upstream is also high.

In addition to periodic testing of surface water and groundwater quality, the certification unit has also processed POME in WWTP before POME is channeled to the flatbed area. Based on field visits to WWTP ponds were not found to be a pollution issue. In the boundary area of the river there is also no indication or activity of chemical applications.

Based on interviews with representatives of workers and village communities around no environmental pollution issues resulting from oil palm plantation and processing activities.

4.4.2

Implementation of water protection has been in line with the procedures of conservation area management. 301 / SNP-ENV-05/11 on 08 June 2011, including: boundary marking of chemical applications in riparian zones, not logging trees on riparian zone, installing conservation signboards, socializing community and employees, monitoring periodically to see the conditions of the riparian zones.

Based on interviews with spraying workers and harvesting workers, it is known that workers already understand the boundary marks of chemical applications in riparian zones or conservation areas.

Based on a field visit to Awatan Estate Blok J1A Division III AWE, it was known that the company had managed the riparian zones according to the procedure.

4.4.3

Mill Effluent is applied to oil palm land area. Related to this, the certificate holder has a license from relevant government in Ketapang District with number license: 673 / KLH-B / 2015 on 05-10-2015.

Certificate holder has conducted Mill Effluent quality monitoring, and the results are in line with the standard of quality set by the relevant government. For example in April / 2017 known pH = 8.07, BOD = 119.67 mg/l, COD = 546.05 mg/l, Maret / 2017 diketahui pH = 8.10, BOD = 274.40 mg/l, COD = 1252.16 mg/l, dan Februari / 2017 diketahui pH = 8.00, BOD = 317.50 mg/l, COD = 1028.56 mg/l.

The results of POME testing routinely have been reported to the relevant agency, for example the results of the second quarter of 2017 testing have been reported to Environment Agency of Ketapang District on February 10, 2018.

4.4.4

Certificate holder able to show water consumption for June 2016 - April 2017. Total water consumption is 204,249 m³ with an average consumption of 1.26 m³ / tFFB. From the recording it is known that the average consumption of mill water does not exceed the budget set 1.30 m³ / tFFB.

Based on field visits to WTP located at Lembiru POM, it is known that the operator has recorded the use of mill water through observation of the flowmeter machine.

Status: Comply

4.5

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

4.5.1

The Company already has SOPs on pest control and plant diseases listed in the Agricultural Reference Manual with No. Policy 110 / EST-ARM / 13 Section 15 concerning crop protection which includes stages of identification, monitoring and control of pests and diseases. Determination of pest control is done when an attack exceeds the threshold based on census results (done every month by applying the principle of early warning system).

In addition, the company showed the Monitoring Document of Development of Beneficial Plant of Awatan Estate related to the planting of host plant which contains, among others, the realization of planting period July 2017 - April 2018 for *Turnera subulata* plant species along 12.4 meters.

4.5.2

The Company has presented the Integrated Pest Management Competence Training Document which was conducted on September 15, 2017. The training materials include basic integrated pest control, basic pest and predatory knowledge, integrated control techniques, pest and disease census and census recording. The training was attended by 35 people consisting of managers, assistants, maintenance supervisors, pest and disease foreman, employees and PSQM (PT SNP, PT BAL and Plasma Sungai Putih).

Based on the field visit to Block J1C Division 3 Awatan Estate, it was known that the company had planted *Turnera subulata*/*Casia cobanensis* and had installed owl nests (*Tyto alba*) as natural control of rat pests. In addition, based on the results of interviews with pest and disease operator, it is known that the labor has been trained IPM activities and can explain the mechanism for handling pests in an integrated manner, such as planting a beneficial plant and breeding of *Tyto alba*.

Status: Comply

4.6

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

4.6.1

The Company has demonstrated procedures relating to the use of chemicals regulated under the Minamas Plantation Agricultural References procedure under No.Policy: 110 / EST-ARM / 13 authorized by Mohd.Ghozali Yahya (Head Plantation Upstream Indonesia) on 16 September 2013 and is effective October 1, 2013. In sections 15 and 16 on plant protection and weed control. The control of plant pest organism is done selectively (according to target) and based on the recommendation given.

Based on the document review it is known that the company has recommended the use of chemicals, determining the type of chemicals, the doses used, the target species and the use of registered pesticides.

4.6.2

The Company has presented the Reference Manual of Agronomy of Oil Palm "No. Policy: 110 / EST-ARM / 13 Section 15 (plant protection) and Section 16 (weed control). The procedure is explained that pesticides for pest and disease control are carried out when census is done above the threshold. As for the application of Herbicide regulated per type of activity eg spraying circle and path is done with 3 rotations for 1 year.

The Company has also referred to records related to the use of pesticides listed in the document in Weeding Program Mature, such as Realization of Circle & Path work in March 2018 at PT SNP of 672 Ha with a program of 639 Ha, as it can be concluded that spray circle and path in March 2018 over 5%.

In addition, the company has also shown recordings of active ingredients used, LD50, target area and number of pesticide applications, for example the use of 743 Liter glyphosate active ingredient with an application area of 2,857.69 Ha and LD50 value of 0.01 mg / kg body weight.

4.6.3

The Company already has SOPs on pest control and plant diseases listed in the Agricultural Reference Manual with No. Policy 110 / EST-ARM / 13 Section 15 concerning crop protection which includes stages of identification, monitoring and control of pests and diseases. Determination of pest control is done when an attack exceeds the threshold based on census results (done every month by applying the principle of early warning system).

The company shows documents related to observation and control of pest organisms in April 2018, among others rat Census, nettle caterpillar , termite, *Oryctes rhinoceros*, rotten shoots and Ganoderma on March 2018 at Pelanjau Estate. Percentage of rat attack is 0.4% (Division 1), UPDKS attack is 0%.

Based on field trips to Block J1C Division 3 of Awatan Estate it is known that the company has planted the beneficial plants such as *Turnera subulata* and *Casia cobanensis* and has done the installation of the owl nest (*Tyto alba*) as the natural control of the rat pest.

The company already has a pesticide reduction program listed in the Sime Darby Responsible Agriculture Charter (September 2016) which outlines that it will implement an integrated pest management program by not using paraquat or chemicals that belong to WHO 1A class. WHO Group 1B will be gradually reduced according to the Rotterdam and Stockholm conventions. Based on document review, its know that for the 2016/2017 and 2017/2018 periods, it was found

that there were 33.69% decrease in the use of pesticides (Glyphosate, indaziplam and tricloprate) in Lembiru Estate.

4.6.4

The Company has listed pesticides including their classification in accordance with WHO (Group IA and IB) eg triclopir active ingredient with LD50 equivalent to 1,480 mg / kg body weight and included in WHO class II list.

Beside that, the company has presented the Sime Darby Responsible Agriculture Charter document (September 2016) outlining that it will implement an integrated pest management program by not using paraquat or chemicals belonging to WHO 1A group. Group 1B WHO will be gradually reduced in accordance with the conventions of Rotterdam and Stockholm.

Based on the results of the document review and interview with spray employees in Awatan Estate it is known that the company has not used the pesticides included in the 1A and 1B lists of WHO or those listed in the Stockholm or Rotterdam Conventions. In addition, based on the results of a visit to Chemical Storage, it was found that there were no pesticides belonging to the WHO 1A and 1B lists.

4.6.5, 4.6.7

The Company has presented SOP on Management of B3 (No. 394 / IT-LB3-23 / 11 dated 27 September 2011 which describes the chemical classification, person in charge, supply of MSDS through supplier, chemical storage method, chemical handling when usage, action against leakage and spillage, first aid and training program.

In addition, the company has demonstrated the recording of Spraying Competence Training on December 15, 2017. The materials presented include the basis of spraying competence, work risk assessment, equipment maintenance and basic knowledge of pesticides.

Based on the spray visit using Ken-Up 480 SL type pests, workers were equipped with PPE shoes, glasses, aprons, masks and rubber gloves. All types of PPE (including masks) are in accordance with the recommendations in the MSDS Ken-Up 480 SL. In addition, the company has carried out pesticide dilution activities in the field in accordance with SOPs such as the provision of containers when carrying out pesticide pouring activities into spray equipment and the provision of PPE for foremen who assist in pesticide pouring activities into spraying equipment.

In addition, based on a visit to the house of the BSS (Block Spraying System) Lembiru Estate, it was known that the company had a rinse room facility and a PPE storage area after being used in the field.

4.6.6

SOP for storage of pesticide container is explained in the B3 management SOP assigned by Head of West Kalimantan with policy number: 301 / SNP-LB3-03 / 11, No. Revision 00, date 04 April 2011.

Based on document review and field visit to Lembiru POM found that the pesticide container had been stored in the licensed hazardous waste storage located in Lembiru POM, and no other uses were found, such as trash bin and flower pots. However, based on field visit in Lembiru housing found pesticides container stored and used in housing areas, for example for water containers. Clarification from the management that the pesticide container was not sourced from Lembiru Estate but from outside the company. In this case the company has not been able to show the mechanism and evidence of control (management control) on the use and storage of pesticide container sourced from the outside. **NCR.**

No. 2018.01 with grade Major.

4.6.8

Based on interviews with management and field visits, the company did not apply pesticides over the air.

4.6.9

The company has presented the recording of Spraying Competence Training on December 15, 2017. The materials presented include spraying competence base, work risk assessment, work tool maintenance and basic pesticide

knowledge with 35 participants consisting of senior assistant, assistant, PSQM, Head Supervisor, BSS Supervisor, spray supervisor, maintenance supervisor, and employee.

Based on observations and interviews on spraying activities in Block J1A Division 3 of Awatan Estate the workers (9 people) have implemented a safe working system by minimizing exposure risk of pesticides ie the use of PPE in accordance with risk assessment and MSDS such as full face helmet, apron, mask, waterproof gloves, boots. In addition, workers can also explain from the environmental aspects of the area prohibited for spraying due to environmental pollution factors. In addition its know that Spray Circle and Path activity was discovered that spraying activities in the associated smallholder (Sungai Putih area) was carried out by the spray team from the Awatan Estate.

4.6.10

Pesticide waste management training conducted on January 2017. Based on interviews with hazardous material and hazardous waste storage operator in Lembiru POM, Lembiru Estate and Awatan Estate known that they understand the pesticides waste management. Awatan and Lembiru Estate sent pesticide containers to hazardous waste storage located in Lembiru POM PT SNP. When the pesticides containers at hazarodus waste storage is full then hazardous waste shall be handed over to hazardous waste collector licensed (PT SBA). Based on interviews with Environment Agency of Ketapang District is known that the management of pesticide containers (balance sheet and manifest documents) has been reported periodically, last reported on 08 April 2018.

4.6.11

The Company has presented the Lembiru Estate employment slot document in April 2018. Based on the document, it is known that there are 20 spray workers.

The Company has presented the document of High-Risk Medical Check Up Result of PT SNP-PT BAL in 2017. Based on the document, it is known that the entire workforce of pesticide application is checked by health (Cholinestrase) with the result is still within normal limits.

Based on interviews with pesticides operator (Circle & Path Spraying) in Block J1A, Division III of Awatan Estate, its known that labor had been routinely checked for health (cholinestrase) and labor had also known the results of checkup through notification from the company doctor. In addition, labor have also explained that there are no complaints related to spray activities including no injury or skin disease due to spray.

4.6.12

The Company has shown the Social Policy (No. Policy 724 / TQEM-SPMS / 09). In the Company Regulation has been stated about the reproductive rights in Article 9 (d) related menstrual/menstrual permission and maternity leave. In addition, women workers who are pregnant or breastfeeding are prohibited from spraying and diverting to other work.

To know the identify pregnant/breastfeeding women, it can be known from the clinical data that workers give to the supervisor. The BSS team explained that pregnancy checkups are usually done monthly along with Posyandu activities. Based on observations and interviews on spraying activities in Block J1A Division 3 of Awatan Estate of workers (9 persons), it is known that unidentified workers who are pregnant and breastfeeding besides that workers also understand related to the prohibition of pesticide application for pregnant and lactating woman.

4.6.6	Non-Conformity No.2018.01 with Major Category	Open
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4.7
An occupational health and safety plan is documented, effectively communicated and implemented.

4.7.1
 The Company has demonstrated OHS related policies including the Occupational Safety and Health Policy authorized by

Head Plantation Upstream Indonesia in December 2011, SOP of OSH K3 Hazard Identification Risk Assessment and Risk Control (No. Policy 7301 / PSQM-ESH / 11) stipulated 07 July 2011, APD Procedure (301 / SNP-SFT-02/11) describes the provisions of PPE and Accident & Investigation Reporting Procedures (310 / SNP-SFT-08/11), describes the systematic reporting and investigation process .

The Company has compiled the work program of OHS committee PT SNP 2018, among others the submission of mandatory OHS report, accidents, OHS regular meetings, OHS socialization to employees, emergency response training and employee health checks. The program is prepared by OHS secretary and approved by OHS Chairman.

Based on interviews with harvesting labor in Block G1A Division 1 of Awatan Estate, it is known that workers are briefed on OHS every working day during the morning briefing before starting work. In addition, workers are aware of the OHS campaign through the OHS warning boards mounted in public places such as offices, roadside and around the company's operations.

4.7.2

The Company has presented Hazard Identification Risk Assessment and Control (HIRAC) documents which describe the types of work, potential hazards, effects, risks, risk control and risk residuals. However, there are still activities / occupations in the operational areas that have not been identified and analyzed risks such as agrochemical storage, land application and replanting activities. **In relation to this matter, it becomes a Non Conformity No. 2018.02 with Major Category.**

4.7.3

The Company has demonstrated records related to OHS including Spraying Competency Training on December 15, 2017 attended by assistants, foreman I, maintenance foreman, BSS foreman, and workers (including workers of PT SNP, PT BAL and Plasma Sungai Putih).

The Company already has an PPE replacement mechanism. Juklak/03-APD/Marau/V/2016 which regulates the Governance of PPE Replacement. In the procedure explains if the PPE is damaged then replaced by the company. However, based on observations and field interviews to the harvesters in Awatan Estate (3 people) and Lembiru Estate (4 people) it is known that PPE shoes provided by the company have been damaged so that employees make their own purchases. In this case the company has not been able to show proof of replacement of damaged PPE according to the procedures they have. This becomes a **Non Conformity No.2018.03 with Major Category.**

4.7.4

The company already has the OHS committee structure responsible for the implementation of OHS. The structure of OHS committee in PT SNP in accordance with SK. Bupati Ketapang No. 74/NAKER/tahun 2016 concerning Amendment of Ketapang Regent's Decree no. 69 of 2013 on the legalization of organizational structure and OHS working procedures PT. SNP dated April 7, 2016.

The Company has routinely conducted OHS meeting (monthly) where the OHS meeting discussed within the scope of the company. In addition, the company has also periodically sent the OHS report to the Department of Manpower such as OHS Reporting for the period of October-December 2017 reported to the relevant office dated January 14, 2018.

Based on interviews with spray workers in block J1A (9 people), it is known that workers have been given socialization related OHS that is at the time of morning briefing activity.

4.7.5

The Company already has Emergency Preparedness Procedures starting from emergency potential identification activities and emergency response preparedness to fire prevention.

Based on document of accident report during the last 12 months, it is known that in PT SNP has happened 2 accident. In relation to this matter, the OHS expert has conducted an investigation and the result of his investigation will be the material

for further evaluation. Forms of evaluation on the occurrence are among others given re-socialization related to safe work on harvesting activities at the morning briefing.

The Company has demonstrated the recording of first aid training held on 20 April 2017 followed by the maintenance and harvesting foremen of PT. SNP and PT. BAL. The training was delivered by Dr. John Myanto A. Simanjuntak (Hiperkes Certificate No.11.279/DH-I/02 issued by the Ministry of Manpower of the Republic of Indonesia on September 25, 2002).

4.7.6

Based on field visits, the company has a clinic (Clinic Beturus Estate) and there are paramedic (doctors & nurses) who keep the polyclinic. In addition the company also works with BPJS health to protect medical care with workers.

Based on interviews with spray workers in block J1A (9 people), it is known that the workforce has been given facilities in the form BPJS.

Based on the results of interviews with the replanting activities contractor, it is known that the labor has been equipped with an operating permit and social insurance (BPJS).

4.7.7

In accordance with Accident & Investigation Reporting Procedures (310 / SNP-SFT-08/11) accident categories are divided into 11 categories of accidents including fatal accidents, accidents that result in lifelong disability, accidents that get a doctor's rest letter more than 5 days and others .

The Company has presented document of Work Accident Monitoring in the Estate and Mill of PT SNP. The work accident during the period 2017/2018 for PT SNP is as much as 2 events with category 4 with Loss Time Accident for 8 days.

4.7.2	Non-Conformity No.2018.02 with Major Category	Open
4.7.3	Non-Conformity No.2018.03 with Major Category	

**4.8
All staff, workers, smallholders and contractors are appropriately trained.**

4.8.1

Company has training identification needs for personnel. The training is intended for the whole staff and workers. The training programme has covered some aspects of the RSPO principles and criteria for examples OHS awareness, good agricultural and manufacturing practices, integrated pest amangement and HCV etc. PT SNP has training programme for 2018, meanwhile training programme for other related contractor workers for examples FFB transport contractor workers and EFB application contractor workers are not available . **Non-Conformity No.2018.04 with Major Category**

4.8.2

Certificate holder has had a worker training records for each unit stored in personal files. Based on interviews, for examples harvester and spraying team indicates that workers have been trained and understand in accordance with the work being performed.

4.8.1	Non-Conformity No.2018.04 with Major Category	Open
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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

Certificate holder has a social and environmental impact analysis document (SEIA and UKL):

- a. Social Environmental Impact Analysis (SEIA) conducted in 2004 and has been approved by the *Bapedalda* of West Kalimantan Province through a letter of approval Number: 660.1 / 177 / Bapedalda-A dated May 24, 2004, with area 24,000 Ha and POM capacity of 60 Tons of FFB / Hour.
- b. Environmental Management Documents (DPLH) for area 2,517 Ha and have obtained Recommendation Number 660.1 / 102 / KLH-B dated March 10, 2014. The company has obtained an environmental permit based on Surat Keputusan Ketapang District No 452 / KLH-B / 2014.

Determining the positive and negative impacts of SEIA and UKL/UPL has involved community participation and relevant stakeholders.

5.1.2; 5.1.3

The implementation of RKL / RP includes: making terraces on sloping land to manage the impact of soil erosion, testing the quality of Kendawangan and Awatan river water, POME testing, groundwater testing to manage the impact of decreasing river water and soil quality, monitoring land fires and completing infrastructure facilities firefighters to prevent the impact of land fires, species RTE monitoring and installation of signboards to prevent the effects of species change, provide job vacancies and businesses to prevent the impact of social unrest, conduct socialization, recording and reporting of workplace accidents to prevent health impacts.

RKL / RPL implementation has been submitted to the relevant agencies on February 10, 2018.

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

Certificate holder able to show maps and documents of HCV identification conducted in 2010 by the consultant agency. From the document, the company identifies and determines HCV. The total area of HCV in PT SNP is currently 615.67 Ha which is derived from the riparian and hill. In the HCV document also explained the flora and fauna protected by IUCN, such as: Gaharu (*Aquilaria malaccensis*), Ulin (*Eusideroxylon zwageri*), Kelempiau (*Hylobates agilis*), Kukang (*Nyctiebus coucang*), Kemeninga (*Tarsius bancanus*), Beruk (*Macaca nemestrina*), Rusa (*Cervus unicolor*), Musang (*Paradoxurus hemaproditus*), Kijang (*Muntiacus muntjac*), Sempidan Biru (*Lophura ignita*), Betet Ekor Panjang (*Psittacula longicauda*), Takur tutu (*Megalaima fafflesii*), Tukur warna warni (*Megalaima mystacophanos*), ect.

HCV assessment is conducted by a competent party and involves consultation with relevant stakeholders.

5.2.2

Implementation of the HCV management plan, such as: conducting socialization to all employees and local community representatives, installing a signboard, not clearing land in the HCV areas, not carrying out chemical applications on the riparian HCV area, periodically testing river water quality and RTE species monitoring in the HCV areas, the last monitoring was conducted in April 2018. From the monitoring report found RTE species protected by IUCN, such as: Kelempiau (*Hylobates agilis*), Kukang (*Nyctiebus coucang*), Kijang (*Muntiacus muntjac*), Beruk (*Macaca nemestrina*), Rusa (*Cervus unicolor*), Musang (*Paradoxurus hemaproditus*), etc.

5.2.3

Certificate holder has socialized RTE species and HCV to local communities and employees. Based on interviews with local communities of Karya Baru village, Sukakarya village, and Awatan Villages that they had known RTE species and should not be hunted. RTE species information can also be seen from the signboard installed around the conservation area. Companies have opportunity to add several components in the monitoring of RTE species such as: check who is found capture, harm, collect or kill of RTE species. **OFI**

5.2.4; 5.2.5

The implementation of the HCV management plan and RTE species has been explained in the indicator of 5.2.4. From the report can be obtained recommendations for further management plans.

Based on interviews with local community it was found that there were no community areas to be HCV areas.

5.2.3 | **Status: OFI**

5.3

Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.

5.3.1

Sources of waste in the POM area among others: generator houses, workshops, chemical storage, laboratories, offices, housing, boilers and WWTP ponds. Sources of waste in the esatte area among others: spraying, office, workshop, housing, generator, clinic, fertilization, and chemical storage.

Waste management plans among other: storing hazardous waste at hazardous waste storage and delivering it to licensed parties, managing POME on WWTP pools, utilizing POME on land application, testing POME quality and air emissions, disposing of garbage on land fill area.

5.3.2

Based on document review and field visit to Lembiru POM, known that the pesticide container had been stored in the licensed hazardous waste storage located in Lembiru POM, and no other uses were found, such as trash bin and flower pots. However, based on field visit in Lembiru housing found pesticides container stored and used in housing areas, for example for water containers. Clarification from the management that the pesticide container was not sourced from Lembiru Estate but from outside the company. In this case the company has not been able to show the mechanism and evidence of control (management control) on the use and storage of pesticide container sourced from the outside.

5.3.3

Based on interviews with hazardous material and hazardous waste storage operator in Lembiru POM, Lembiru Estate and Awatan Estate known that they already know the management of hazardous waste. Awatan and Lembiru Estate sent pesticide containers to hazardous waste storage located in Lembiru POM PT SNP. If hazardous waste at hazardous waste storage is full then hazardous waste shall be handed over to hazardous waste collector licensed (PT SBA). Based on interviews with Environment Agency of Ketapang District is known that the management of pesticide containers (balance sheet and manifest documents) has been reported periodically, last reported on April, 08 / 2018.

Status: Comply

5.4

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

The auditor has seen all documents for the use of renewable energy (fiber and shells) 2017-2018. For example:

- February 2018: FFB processed was 8966 MT, fiber usage was 1169 MT, and shell usage was 540 MT. Rata rata renewable energy usage was 0.19 MT / ton FFB.
- March 2018: FFB processed was 16,454 MT, fiber usage was 2,139 MT, shell usage was 987 MT, and total renewable energy usage was 0.18 MT / ton FFB.
- April 2018: FFB processed was 20.000 MT, fiber usage was 2600 MT, shell usage was 1200 MT, and total renewable energy usage was 0.19 MT / ton FFB.

The auditor also has seen all documents for the use of fossil fuels 2017-2018. For example:

- December 2018: FFB processed was 9084 MT, fosil usage was 16193 liter.
- January 2018: FFB processed was 11175 MT, fosil usage was 10560 liter.
- February 2018: FFB processed was 8996 MT, fosil usage was 15.693 liter.

The auditor has also seen all the renewable energy efficiency documents (kwh) 2017 - 2018. For example:

- February 2018: FFB processed 8966 MT, kWh Turbin 104560. kWh Turbin per FFB 11.66
- March 2018: FFB processed 16454 MT, kWh Turbin 182960. kWh Turbin per FFB 14.48
- April 2018: FFB processed 20000 MT, kWh Turbin 212560. kWh Turbin per FFB 10.62

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; 5.52

Based on field visits, there is no indication of management of oil palm land by burning.

Status: Comply

5.6

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

5.6.1

Pollution sources and emissions including GHG produced from plantation and mill activities such as: land clearing activities, fertilizer use, pesticide use, generator activities, POME.

Pollution and emission management plans, including GHG such as: zero burning policy implementation, use fertilizer and pesticides in line with the recommendations of the agronomic team, use EFB as mulch on the soil, use of fibers and shells as fuel, and periodic air quality testing.

5.6.2

Implementation of pollution or emissions mitigation plans including GHG, such as:

- Utilization of fiber and shells for boiler fuel. Total with total usage of fiber during the last 12 months 20.437 tons and shell 9,710 tons.
- Utilization of EFB for compost fertilizer. Total usage during the last 12 months 4,586.27 tons.
- Utilization of POME for liquid fertilizer on the land / Land Application, with total usage during last 12 months 67,202 m3.
- Conducting periodic POME quality testing (explained in 4.4.3).
- Conducting periodic air quality testing.

- The auditor has seen all the results of the emission test of generator numbers 1 and 3 conducted in December 2017. All parameters are in line with the standards set by the government (PermenLH No. 2 of 2008), for example testing on generator set no. 3 known Total Particulate = 89.40 mg / Nm3, CO = 215.33 mg / Nm3, NOx-as No2 = 439.33 mg / Nm3 and SO2 = 19.00 mg / Nm3 and Opasitas = 1-10%.

- The auditor has seen all boiler emission testing no. 3 and 1 are conducted in December 2017. All parameters are in line with the standards set by the government (PermenLH No. 07 of 2007), for example testing on Boiler no. 3 known Particulate 110.20 mg / m3, SO2 = 22.00 mg / m3, NO2 = 341.67 mg / m3, HCL 3.10 mg / m3, CL2 1.84 mg / m3, NH3 0.48 mg / m3, HF 1.29 and Opacity 15-20%.

- The results of ambient testing in front of the Mill Office, in front of hazardous waste storage, and in front of the Lambiru Office in December 2017. All parameters are in line with the standards set by the government (PP No. 41 of 1999), for example testing in front of the Mill Office known to Particles 30.83 µg / Nm3, SO2 60.61 µg / Nm3, CO 101.40 µg / Nm3, NO2 80.42 µg / Nm3, TSP 161.58 µg / Nm3, Noise 72.10 dBA.

Based on field visit to Mill, known that the

5.6.3

Lembiru POM and supply bases has calculated GHG emissions for period 2017 using the RSPO PalmGHG calculator Version 3.0.1 and put the accurate data into RSPO PalmGHG calculator exclude LUC emission are not applied in calculation. The calculation have been verified with the final summary of the net GHG emissions (tCO₂e/tCPO) figure. The summaries of calculation are presented as follows:

Emmission per product	tCO ₂ e/tProduct
CPO	5.76
PK	5.76

Production	t/yr
FFB processed	41568
CPO produced	36922.98
PK produced	7865.22

Extraction	%
OER	22.16
KER	4.72

Land use	Ha
Planted area	11350.34
Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	735.1

Summary of field emission and Sinks

Description	Own plantation		Group plantation		3 rd party	
	tCO ₂ e	tCO ₂ e/tFFB	tCO ₂ e	tCO ₂ e/tFFB	tCO ₂ e	tCO ₂ e/tFFB
Emissions Sources						
Land conversion	12034.7	0.09	0	0	2879.3	0
CO ₂ emmisons from fertilizer	304054.93	2.2	0	0	4664.6	0
NO ₂ emissions	9230.57	0.07	0	0	1806.25	0
Fuel comsumption	1512.69	0.01	0	0	213.66	0
Peat oxidation	0	0	0	0	0	0
Sinks			0	0		0
Crop sequestration	-85662.03	-0.62	0	0	-2049.61	0
Sequestration in Conservation area	-3154.48	-0.02	0	0	0	0
Total	238016.38	1.72	0	0	- 10888.62	0

Summary of Mill Emmission and Credits

Emissions	tCO ₂ e	tCO ₂ e/tFFB
POME	30276.43	0.18
Fuel Consumption	521.42	0
Grid Electricity Utilisation	0	0

Credits		
Export of Grid Electricity to Housing & Grid	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	30797.85	0.18

POME Treatment

Emissions	%
Divert to compost	0
Divert to anaerobic digestion	100

POME Diverted to Anaerobic Digestion

Emissions	%
Divert to anaerobic pond	100
Divert to methane capture (flaring)	0

Status: Comply

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 Social Impact Assessment for PT SNP conducted in March 2010 through cooperation with third parties (Aksenta). SIA document (2010) contains evidence of communities / villagers participation in study. Participation was conducted by interviews and focus group involving the village and community leaders, traditional leaders, youth leaders, and sub-district officials, including the police.

Results of the consultation meeting had been summarized in the SIA report. As part of social impact management, CH has channelled Corporate Social Responsibility (CSR) by considering the results of the EIA study and Social Impact Assessment. Identified impacts in SIA document are:

- Direct positive impacts, e.g. Workforce, new sources of livelihoods, increased income of surrounding villager, the increased accessibility and mobility of people, goods and services, and the positive perception of the public.
- The indirect positive impact, for example: the higher growth of local businesses, the increased flow of money and the circulation of money in the surrounding villages as well as the rising purchasing power of the local community.
- Direct negative impacts, such as shrinking of the local people's lands, negative perception on the company, and land disputes.
- Indirect negative impacts and accumulated impacts, for example, water scarcity, waning of tradisional value system of mutual cooperation, changing of lifestyle of rural communities.
- Impacts on employee: loyalty and productivity, if employees feel cared for and treated properly it will impact on high productivity and employee loyalty.

6.1.2

As stated on indicator 6.1.1, SIA identifications are identified in a participatory way, for examples participation was conducted by interviews and focus group involving the village and community leaders, traditional leaders, youth leaders,

and sub-district officials. Since 2016 -2018 PT SNP has conducted land preparation for replanting activities. Document review shown social impact assessment for current repanting activities are conducted on 2016, but evidence for participaroy way of affected parties in this assessment are not available. **NCR No. 2018.05**

6.1.3, 6.1.4

Certificate holder has established management planning and monitoring for social impact based on the identification impact which has been arranged by PSQM and PSD Staff and also known by the Head of SOU 13 and the Manager of PSD. This plan has been informed the positive and negative impact including the time management planning and the person in charge for the activity, such as:

- a. Establishment of Panel Committee.
- b. Visiting the society and the village which were related by.
- c. Solution and mediation for land of dispute.
- d. Evaluation of implementation programme

Document review shown that company has established social monitoring and management plan for 2016-2017 based on 2016 review. Meanwhile evidence for participary way of affected parties in this social monitoring/management programme review are not available. **NCR No. 2018.06**

6.1.5

Based on interview and field observation found there is no smallholders scheme under PT SNP

6.1.2	Non-Conformity No.2018.05 with Major Category	Open
6.1.4	Non-Conformity No.2018.06 with Minor Category	

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

Certificate holder has procedures Communication listed on policy 301/SNP-KOM-08/11 and approved by each estate manager . This procedure explains to the user about handling communication and consultation related principles and requirements sustainability palm oil in each operational. This procedure includes guidance in planning, implementing, regarding communication and consultation among stakeholders. Interviews with relevant stakeholders for examples Ketapang regent manpower agency and enviromental agency indicates they known how to communicate wth companies based on company existing procedures.

6.2.2

According to the policy 301/SNP-KOM-08/11, the company has appointed plantation service deparment as person in charge of for social and environmental issues. PSD department also responsible to top management for the implementation of the process of communication and consultation with stakeholders including the dissemination of the list of documents that can be accessed by stakeholders. Based on interview with stakeholders in Pelanjau Jaya Village, Karya baru Village and Sukakarya Village, acquired information that villagers have alredy know, PIC which is apponted to communicate with them

6.2.3

Certificate holder have list of stakeholders which consist of government district, head of village, customary leader, etc. Management unit keeps all communication/consultation or meeting record with stakeholders in mail folder. All records of communication with stakeholders is kept in incoming and outgoing mail folder. Based on document verification, it is known that all incoming mail have been responded by companies on time

	Status: Comply	
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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

Certificate holder has mechanism for complaints handling for all affected parties, listed on administration procedures dated 15 October 2015. The mechanism describes that management will ensure the security and confidentiality of the complainants from the parties (whistle blower). There was also available of procedure of Complaints Handling of Employee (SOP-006/SNP/III/11). Based on interviews with head of workers union and gender committee, there is no complaint/dispute that can not be resolved at the unit management level until now.

6.3.2

Interview relevant stakeholder such as Ketapang manpower agency, workers union, and gender committee indicates there was no dispute among the companies and the other parties. Based on verification on complaint document and information by management unit, known that in 2017-2018 there is disputes between company and workers. All complaint for examples related to housing facilities improvement has been responded by company with maintenance.

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 Certificate Holder has procedure of land occupation compensation (Policy No. 343/PSD-OKUP/11). These procedure contained explanation that in the processes of compensation or restitution of land, the company guided by the Social Policy document Minamas Plantation outlined in Sustainable Plantation Management Guideline No. Policy: 724/TQEM-SPMS/09, Rev.00, dated 27 August 2010. Plantation Upstream Indonesia ensure that any negotiations relating to compensation for the loss of the rights of a person authorized under the Act has been made with a documented system that enables local communities and other stakeholders to express their opinion through their own representative institutions. Likewise in land acquisition procedures Occupational (Policy No. 343/PSD-OKUP/11), explained that the land acquisition occupational negotiations with land owners (based on legal documents) carried by the Manager of Plantation Services-Region and Manager Estate and witnessed by officials village or related parties.

The procedure of land occupation compensation as guidance for land compensation process. The documents requirement in land compensation shall signed by land owner, management unit representative, head of sub district, notary and head of village. These documents shall included of photograph, map, letter of land release by the owner, official report was signed by related parties consist of land owner and management unit representative, witnessed by head of village and sub district. The process of payment for land or land compensation shall completed with receive and photograph as documentation evidence.

6.4.3

Certificate holder was documented all of land compensation process. The documentation consist of Map, negotiation result (minutes of meeting), land release letter, payment receive was filled in estate office based on land location. Based on Information Request Procedure (RSPO/1.1/PI), the documentation of land compensation process are categorized as limited access and should approved by Plantation Service 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.

There was shown the documentation of compensation process has been signed by related party both of land owner and

the company representation and witnessed by village and sub district head. For example, documentation of land compensation to community member in Batu Menang Village, Suka Karya Village, Marau Sub-district on 24 May 2013. The document was completed with Minutes of Meeting which and agreement between two parties after the consultation process facilitated by Suka Karya Village Head and also completed with land location map.

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

Certificate holder has implemented the payment of wages for employees refers to the minimum wage in accordance with Decree Kalimantan Barat Governor No 706/DISNAKERTRANS/2017 on November 2017 is explained Minimum Wage for year 2018 is set in Rp. 2.562.000,-.Based on document verification of Salary Slip April 2018 was shown that wages payment is in accordance with the Minimum Wages. Terms of overtime payments are also in accordance to National Regulation with the provision of overtime calculation ie 1.5 hourly wages for first hour overtime and 2 x one hour wage for second hour overtime. Based on interviews with Labor Union, Labour Agency and workers, explained that the Company has paid wages according to the minimum wage set by the government and there is no issue about payment or worker welfare. Terms of overtime payments for employees who work over working hours have been made in accordance with applicable provisions, such as examples of overtime workers of mill. For harvesters do not use overtime payment system, but the system of premium payment of harvest by still get the basic wage and there is no violation of wage or forced labor regulation. Document review, Interviews with related workers and stakeholders also acquired information that companies not used any daily workers in all operational activities.

6.5.2

Interviews with head of labor union indicates that collective labor agreement has been explained and socialized to all workers. Both company and workers have Collective Labour Agreement period 2016 – 2018 which is contained available in Indonesian languages. The document has been contained about the acceptance of workers, working time, wages, employment, overtime and the payment, social security, work equipment and OHS, retirements insurance and etc. Based on interviews with workers, Labor Union and Labor Agency known that all employees have employment agreements or appointment letter and there were no issues or violations committed by Company related to worker welfare included in payment.

6.5.3

Based on visit to the Awatan housing complex for examples, company has been providing workers as well as housing, worship places, clinic, sports facilities and also daycare in appropriate conditions. In addition, the company provides transportation for student who attend school in the village around the company. Electricity in housing complex have been provided from mill and the clean water supply provided by the company through the artesian well. Based on interviews with workers and labor union, explained that the number of homes provided by the company have been sufficient for all workers

6.5.4

Certificate holder gives permission to open a shop selling daily necessities in the housing complex and there is a market in Marau Sub district. Every week there is a peddler who came from the surrounding villages and sell daily consumption needs. It became the company's efforts to monitor and improve workers access to food was decent, fairly and with reasonable price.

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		
Certificate holder has Policy of Freedom of Association for Employees listed on " Pedoman Manajemen Perkebunan Berkelanjutan " No. Policy 724/TQEM-SPMS/09, on August 2010 and available in Bahasa. It stated that the company respects the provisions and rules applicable including freedom of association for workers / employees that become basic rights of workers. Implementation of the policy is formation of Labor Union. Labor Union agreements and/or labor laws that explain payments and working conditions listed in the document Collective Labour Agreement which was signed by representatives of employer and workers and has been approved by the Labour Agency of Ketapang regent. From interviews with employees and head of labor union , it was known that every worker has the right to join the labor union. In addition, union membership is voluntary for the workers.		
6.6.2		
Certificate holder showed minutes of meeting of Labor Union, for example on March, 2018 discussing about may day action plan, and new collective laobr agreement drafting attended by 9 participants from each estate. Based on interviews with labor union, explained that Labor Union has good communication with the company and records of meeting with labor union or workers representative are available.		
	Status: Comply	
6.7		
Children are not employed or exploited.		
6.7.1		
Policy related to requirement of worker age can listed on on " Pedoman Manajemen Perkebunan Berkelanjutan " No. Policy 724/TQEM-SPMS/09, on August 2010. Based on Employee List 2018 which described the worker's date of birth, shown there in no underage workers (<18 years) in PT SNP. Field visit and interviews on lembiru estate block F2BC for EFB application activities showed that EFB applicators (contractor workers) are not comply with minimum age requirements. Therefore, companies are not able to shown implementation for mechanism and management control to ascertain all of third party workers/contractors workers are comply with minimum age regulations. NCR No. 2018.07		
6.7.1	Status: Non conformance NC.2018.07 with major category	Open
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		
Policy related to not discriminate the workers listed in the No. Policy 724/TQEM-SPMS/09 stated that every operational unit must realize industrial relations without distinction of race, religion, race and sex in all occupations. Based on the list of workers review, shown that workers come from diverse ethnic, religious, age, sex and there was no migrant workers. Based on interview with Labor Union, gender committee and workers during audit on PT SNP known that the company did not discriminate on workers recuitment or promotions. During audits on Awatan estate, auditors team found one woman spraying foreman, and its become implementation that company gives equals opportunities for all workers.		
6.8.2, 6.8.3		
Certificate holder kept the personal file of each worker in HRM Department. Based on interview with management, the recruitment is conducted through the company requirement. Worker promotion, mutation or demotion is done through the		

<p>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.</p>		
<p>Status: Comply</p>		
<p>6.9 There is no harassment or abuse in the work place, and reproductive rights are protected.</p>		
<p>6.9.1 Certificate holder has "<i>Pedoman Manajemen Perkebunan Berkelanjutan</i>" No 724/TQEM-SPMS/09. It explains that company will protect female worker from indications of sexual harassment in the workplace, other rights related to female worker reproductive. Workers can submit complaint about sexual harassment or violence related to reproductive rights in accordance with "<i>Pedoman Penerapan Kebijakan Gender Minamas Plantation</i>" No policy. 301/SNP-ENV-03/11. The procedure has been socialized to the workers. Based on interview with female workers in Awatan 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 also provides the female worker with maternal leave.</p>		
<p>Status: Comply</p>		
<p>6.10 Growers and mills deal fairly and transparently with smallholders and other local businesses.</p>		
<p>6.10.1-6.10.4 The company cooperates with smallholders under cooperative management (Cooperative of Perkebunan Sejahtera Palma Sejati). Contract agreement available (no. 001/KemitraanKhusus/SNP-BPS/VI/2014; No.001/Kopbun-SPS-Khusus/VI/2014). The contract are fair, legal and transparent and was signed by relevant agency. Based on interview with Cooperative Management, to date there have been no complaints regarding the price of FFB and remaining payment (debt) farmers. TBS Price refers to the price of Plantation Agency, and everything related to production, cost, remaining payment (debt) explained in the Cooperative Monthly Report and can be accessed by farmers.</p>		
<p>Status: Comply</p>		
<p>6.11 Growers and millers contribute to local sustainable development wherever appropriate.</p>		
<p>6.11.1;6.11.2 There is no scheme smallholders under PT SNP management. PT SNP has contributed to local development throughout CSR program. The contribution as follows traditional events, donation, etc. In addition, the company also cooperate with local contractors such as for FFB transport. Stakeholders meeting are conducted on february 2017 to indentify the needs and priorities of local communities development. Generally PT SNP shown local communities development by local contractor engagement, taxes payment for central/local government, local workers recruitment, and CSR programme.</p>		
<p>Status: Comply</p>		
<p>6.12 No forms of forced or trafficked labour are used.</p>		
<p>6.12.1,6.12.2,6.9.3 Based on document review, field observation, and interviews with worker and stakeholders, indicates 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,</p>		

auditors did not sighted any harvester accompanied by their children. Based on interview with worker union member, also indicates there is no issue related to force labour and contract substitution. In general, workers that become audit sampling shown deep awareness regarding rights and obligation based on their working agreement.

Status: Comply

**6.13
Growers and millers respect human rights**

6.1.3.1

Certificate holder has policy on human rights approved by head of SOU 13 on 2015 which explain the kind of human rights for all workers. The policy has been socialized to the workers and they know and understand about the policy. Based on field observation and interview with worker and internal stakeholder (labor union and gender committee), it is known that there is no complaint related to human rights violation. Socialization for this policy are available and verified by auditors during audit.

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

Certificate holder does not extend of new plantation area since November 2005. There are only a replanting activities that have been conducted since 2016 in Awatan Estate.
Related to environment analysis document dapat dilihat pada **indicator 5.1.1**

7.1.2; 7.1.3

Certificate holder does not extend of new plantation area since November 2005. There are only a replanting activities that have been conducted since 2016 in Awatan Estate.
Related to Management and environmental monitoring dapat dilihat pada **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

Certificate holder does not extend of new plantation area since November 2005. There are only a replanting activities that have been conducted since 2016 in Awatan Estate.

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.**

7.3.1-7.3.4

Certificate holder does not extend of new plantation area since November 2005. There are only a replanting activities that have been conducted since 2016 in Awatan Estate. Even so, the certificate holder keeps submitted the progressive

<p>submission of land use Change Analysis result for the cleared area prior to HCV Assessment since 2005 to RSPO (attn: Mr. Hj Salahudin Yaacob / Ms Oi Soo Chin) on August 28, 2015.</p>		
	Status: Comply	
<p>7.4 Extensive planting on steep terrain, and/or on marginal and fragile soils, is avoided.</p>		
<p>7.4.1;7.4.2 Certificate holder does not extend of new plantation area since November 2005. There are only a replanting activities that have been conducted since 2016 in Awatan Estate.</p>		
	Status: Comply	
<p>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.</p>		
<p>7.5.1 Certificate holder does not extend of new plantation area. There are only a replanting activities that have been conducted since 2016 in Awatan Estate.</p>		
	Status: Comply	
<p>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.</p>		
<p>7.6.1-7.6.6 Certificate holder does not extend of new plantation area since November 2005. There are only a replanting activities that have been conducted since 2016 in Awatan Estate.</p>		
	Status: Comply	
<p>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.</p>		
<p>7.7.1-7.7.2 Certificate holder does not extend of new plantation area since November 2005. There are only a replanting activities that have been conducted since 2016 in Awatan Estate.</p>		
	Status: Comply	
<p>7.8 New plantation developments are designed to minimise net greenhouse gas emissions.</p>		
<p>7.8.1,7.8.2 Certificate holder does not extend of new plantation area since November 2005. There are only a replanting activities that have been conducted since 2016 in Awatan Estate.</p>		
	Status: Comply	
<p>PRINCIPLE #8 Commitment to continuous improvement in key areas of activity</p>		

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.

8.1

Based on the results of the audit at ASA-4 found recurring non-conformities from the previous ASA. In this regard, the company has not been able to show evidence of implementing RSPO systems and standards that are consistent, monitored and evaluated (**NCR No. 2018.10**). Repeated nonconformities are:

- SCCS E.3.1
- 4.7.3 Major
- 4.8.1 Major

Environmental

Certificate holder has conducted continuous improvement in environmental aspect, such as: conducting POME test periodically, testing of surface water quality and groundwater every 6 months, conducting air emission testing every 6 months, and stored scheduled waste scheduled waste storage and reporting the results of environmental management and monitoring to environment agency.

Best Management Practice

The Company has shown the recording of the internal audit of the company listed in the Lembar Kertas Kerja Kesimpulan (LK3P) document dated October 27, 2017. As for the internal audit results, it is found that there are 17 findings on Finance, Inventory, Agronomy and Technical Administration sections. All findings have been improved, eg each division reactivates monitoring of FFB transport to mill as well as checks monitoring of transport and analyzes the reasonableness of transport capacity. Related to this, the company has made system improvements on 01 November 2017.

8.1.1

Status: Non Conformance with Major Category

3.2. Summary of Assessment Report of Supply Chain Requirement

3.2.1 General chain of custody requirements for the supply chain

Clause	Requirement
5.1	Applicability of the general chain of custody requirements for the supply chain
5.1.1	<p>The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. After the end product manufacturer, there is no further requirement for certification.</p> <p>Question: Does the organization take legal ownership and physically handles RSPO Certified Sustainable oil palm products at their premises or through the outsourcers?</p> <p>The Certificate Holder take legal ownership and physically handles RSPO Certified Sustainable oil palm products. The organization is also using CPO & PK transporter contractor:</p> <ul style="list-style-type: none"> - CPO Transporter contractor: CV Trans Pillar Tiga - PK Transporter contractor: CV Sumber Sungai Kyai
	Status: Comply
5.1.2	<p>Traders and distributors require a license obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model.</p> <p>Question: Is the organization buying from RSPO licensed traders who pass the certification number of the product manufacturer and the applicable supply chain model?</p> <p>The Certificate Holder does not buy from any RSPO licensed traders</p>
	Status: Comply
5.1.3	<p>Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform.</p> <p>Question: Is the site level or its parent company a member of RSPO and registered on RSPO IT platform?</p> <p>The parent company are member of RSPO:</p> <ul style="list-style-type: none"> - Number of RSPO membership: 1-0008-04-000-00, 6 September 2004. - RSPO IT Platform for Lembiru POM: RSPO_PO1000001867
	Status: Comply
5.1.4	<p>Processing aids do not need to be included within an organization's scope of certification.</p> <p>Question: Is the site level or its parent had a processing aids?</p> <p>Parent company or site has no processing aids</p>
	Status: Comply

5.2	Supply chain model
5.2.1	
The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.	
Question: Has the organization applied the Supply Chain Model correctly?	
The Certificate Holder has applied Mass Balance Supply Chain Model correctly.	
	Status: Comply
5.2.2	
The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	
Question: Has the organization applied a combination of Supply Chain Model correctly?	
The Certificate Holder has applied Mass Balance Supply Chain Model only	
	Status: Comply
5.3	Documented procedures
5.3.1	
The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified.	
Questions : Documented procedures established and covering all provisions following:	
<ul style="list-style-type: none"> • Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. • Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). • Identification of the role 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 organization's procedures for the implementation of this standard. 	
The Certificate Holder has had the procedure of product identification and traceability at POM number RSPO/66/SCCS/15-SNP dated 26 April 2015 revised 15 May 2017. The procedures established and covering all elements of the supply chain model requirements, records and reports of compliance with supply chain requirements including training records. The procedures also identified role of implementation responsibility persons that trained. RSPO Supply Chain Training held at 1 and 2 March 2018. The person in charge of the POM operationals are the Oil Mill Manager, Assistant of PSQM, Laboratory Foreman/Assistant etc.	
Based on the results of visit in Jetty Kelampai bulking it's found the documents submitted CPO and Kernel to the buyer. However, the bulking can not show evidence of RSPO identity of the MB supply chain model on certified product delivery reports as set out in procedure (RSPO / 66 / SCCS / 15-SNP) for sale of RSPO certified products. As an example of Kernel sales to PT. Married Nabati Indonesia with a transaction on palm trace on 7 September 2017 with the shipping kernel invoice No. 0001/BAP-IKS/BLB/VII/2017 dated 22 July 2017 for total volume of 1,101.15 tons. NC 2018.08	
	Status: Non Conformance with Major Category
5.3.2	
The site shall have a written procedure to conduct annual internal audit	
Question :	
Documented annual internal audit procedures established and covering all provisions :	
5) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market	

Communications and Claims Documents.

ii) Effectively implements and maintains the standard requirements within its organization.

The Procedure to conduct annual internal audit are describe at operational procedure quality environment safety & health Internal Audit (SCCS-IA/RSPO/PSQM/04) issued on 1 March 2018 and Manual RSPO SCCS *Standar sertifikasi rantai pasok RSPO* issued on 2 January 2018 revised 2 February 2018. Internal audit conducted in accordance to internal audit procedure to determine wheter the mill conforms to the requirements in the RSPO SCCS and the RSPO market communications and claims documents and effectively implements and mantains the standard requirements. The site has internal audit plan in 4 June 2018. The plan for internal audit is became **OFI**.

Status: OFI

5.4 Purchasing and goods in

5.4.1

The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier

Question :

All RSPO product information is provided by suppliers in accordance with :

- The name and address of the buyer;
- The name and address of the seller;
- The loading or shipment / delivery date;
- The date on which the documents were issued;
- A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);
- The quantity of the products delivered;
- Any related transport documentation;
- Supply Chain certificate number of the seller;
- A unique identification number
- Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation).
- The site receiving RSPO certified oil palm products shall ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements/Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. Refer to section 5.7.1 of this document for further guidance.
- A check of the validity of the Supply Chain Certification of suppliers is required for all sites that are SC certified. This shall be checked via the list of RSPO Supply Chain Certified sites on the RSPO website (www.rspo.org) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements.
- The validity of license for traders and distributors shall also be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcements/announcements.

The certificate holder has not purchased CSPO or CSPK. The mill has received FFB certified product from the estates. The information for RSPO certified products is available and shown in FFB delivery documents. The information such as:

- The name and address of the supplier
- The loading / delivery date;
 - a. The date on which the documents were issued;
 - b. A description of the product,
 - c. The quantity of the products delivered;
 - d. Any related transport documentation;

e. etc.	
	Status: Comply
5.4.2 The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents	
Question : Has the organization established mechanism in place for handling non-conforming oil palm products and/or documents?	
The Procedure/mechanism of handling non conforming products are describe in Manual RSPO SCCS <i>Standar sertifikasi rantai pasok RSPO</i> issued on 2 January 2018 revised 2 February 2018. Non conforming products where there is contaminations of RSPO certified materials during receiving, processing, storage and despatch. The Volume of downgraded material are recorded accordingly.	
	Status: Comply
5.5	Outsourcing activities
5.5.1 In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mill cannot outsource processing activities like refining or crushing.	
Question : Are the outsourcers RSPO certified?	
There is an operation outsource activities to a independent contractor for CPO/PK transporter <ul style="list-style-type: none"> - CPO Transporter contractor: CV Trans Pillar Tiga - PK Transporter contractor: CV Sumber Sungai Kyai <p>The site has checked all CPO and PK at the deliveries from mill to bulking to has ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard.</p>	
	Status: Comply
5.5.2 Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following: <ol style="list-style-type: none"> a. The site has legal ownership of all input material to be included in outsourced processes; b. The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary. c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. d. d) The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance 	
Question : Has the site established outsourcing procedures, agreement and keeps legal ownership of the products during the outsourcing	
Procedure of outsourced contractor are describe in Manual RSPO SCCS <i>Standar sertifikasi rantai pasok RSPO</i> issued on 2 January 2018 revised 2 February 2018. Mill shall ensure that outsourced activities directly linked to handling of IP certified	

CPO and PK for storage and transportation. The mill shall inform in advance the outsourced contractors if audit is deemed necessary by certification bodies and ensure that the contractors engaged provide relevant access for the CBs to their respective operations, system etc.

The site has an agreement or contract covering the outsourced process:

- CPO Transporter contractor: CV Trans Pillar Tiga, Agreement on 1 July 2014 to 31 August 2014.
- PK Transporter contractor: CV Sumber Sungai Kyai, Agreement on 2 January 2015 available for 6 months.

The agreements with CPO and PK transporter contractors have expired and the site can not show the agreement documents to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary. **NC 2018.09**

Status: Non Conformance with Major category

5.5.3

The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.

Question : Has the site maintained names and contact details of all outsourcers?

The Certificate Holder has record the name and contract details of contractor used for handling of RSPO certified oil palm products:

- CPO Transporter contractor: CV Trans Pillar Tiga, address: Jl. Merpati No.4A Ketapang
- PK Transporter contractor: CV Sumber Sungai Kyai, Address: Sub district Marau, District Ketapang

Status: Comply

5.5.4

The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products

Question : Has MUTU informed about any new outsourcers?

Since the General chain of custody requirements for the supply chain is applied in 2018, the CH has contractors for CPO Transporter contractor (CV Trans Pillar Tiga) and for PK Transporter contractor (CV Sumber Sungai Kyai). There is no new contractor used for the processing or physical handling of RSPO certified oil palm products.

Status: Comply

5.6

Sales and goods out

5.6.1

The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form: The name and address of the buyer

Question :

All RSPO product information is provided by the organisation in accordance with :

- The name and address of the seller;
- The loading or shipment / delivery date;
- The date on which the documents were issued;
- A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);
- The quantity of the products delivered;
- Any related transport documentation;
- Supply chain certificate number of the seller;

- A unique identification number.
- Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products
- For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. Refer to section 5.7.1 of this document for further guidance.

The information for RSPO certified products is available and show in Despatch documents. The information such as:

- The name and address of the buyer;
- The name and address of the seller;
- The loading or shipment / delivery date;
 - a. The date on which the documents were issued;
 - b. A description of the product, including the applicable supply chain model (Mass Balance)
 - c. The quantity of the products delivered;
 - d. Any related transport documentation;
 - e. certificate number of the seller;
 - f. etc.

Shipping Announcements and Confirmations on the RSPO IT platform for periods Period of 3 July 2017 to 2 July 2018

• **Certified CPO sold to each buyer period of 3 July 2017 to 2 July 2018**

Date	Buyer	Volume (Ton)
9 February 2018	Credit allocation (book & claim)	8,215
19 February 2018	Credit allocation (book & claim)	5,000
4 April 2018	Credit allocation (book & claim)	1,000
Total		14,215

• **Certified Palm Kernel sold to each buyer period of 3 July 2017 to 2 July 2018**

Date	Buyer	Volume (Ton)
7 September 2017	PT. Wilmar Nabati (Pelintung)	1,101.15
17 January 2018	PT. Sari Dumai Sejati	986.46
Total		2,087.61

Status: Comply

5.7 Registration of transactions

5.7.1

Supply chain actors who:

- are mills, traders, crushers and refineries; and
- take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable

Question :

Has the organization registered their transactions in the RSPO IT platform? (mills, traders, crushers and refineries only)

All Transactions are registered in RSPO IT platform.

Status: Comply

5.7.2

The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:

- Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures.
- Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually.
- Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.
- Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.

Question :

Did the organization correctly perform the applicable actions on RSPO IT Platform?

Transactions are registered in RSPO IT platform as for periods Period of 3 July 2017 to 2 July 2018

• **Certified CPO sold to each buyer period of 3 July 2017 to 2 July 2018**

Date	Buyer	Volume (Ton)
9 February 2018	Credit allocation (book & claim)	8,215
19 February 2018	Credit allocation (book & claim)	5,000
4 April 2018	Credit allocation (book & claim)	1,000
Total		14,215

• **Certified Palm Kernel sold to each buyer period of 3 July 2017 to 2 July 2018**

Date	Buyer	Volume (Ton)
7 September 2017	PT. Willmar Nabati (Pelintung)	1,101.15
17 January 2018	PT. Sari Dumai Sejati	986.46
Total		2,087.61

Status: Comply

5.8

Training

5.8.1

The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff

Question :

Has the organization established RSPO training plan?

RSPO SCCS training Planned annually every years and describe in SCCS training programme (September 2018).

Status: Comply

5.8.2

Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed

Question :

Has the organization Delivered Effective RSPO training?

The evidence of training are shown in RSPO Supply Chain Training held at 1 and 2 March 2018. Based on interview at weighbridge station is known that the weighbridge operator and SCCS person in charge have understand the RSPO supply

chain procedures.								
Status: Comply								
5.9	Record keeping							
5.9.1								
The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements								
Question :								
All records are accurate, complete, up-to-date and accessible?								
The Certificate Holder has maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements. Those are describe in ASA 4 report (Module E CPO Mills - Mass Balance Requirements).								
Status: Comply								
5.9.2								
Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock								
Question :								
All records are kept for minimum two years and comply with legal and regulatory requirements?								
The retention times for all records and reports are keep in minimum 2 years.								
Status: Comply								
5.9.3								
The organization shall be able to provide the estimate volume of palm oil / palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.								
Question :								
For all palm oil / palm kernel oil volumes purchased (input) and claimed (output) records kept over a period of twelve (12) months.?								
Record of all certified palm oil / palm kernel oil volumes purchased (input) and claimed (output) for period of 3 July 2017 to 2 July 2018:								
	FFB Received		CPO Production			PK Production		
Month	Certified	Total FFB	Certified	Total	Book & claim	Certified	Total	RSPO Claim
Jul 2017	8,832.12	18,701.18	1,882.17	3,985.32	0	457.54	968.80	0
Aug 2017	10,361.46	19,032.20	2,392.80	4,395.16	0	543.05	997.50	0
Sep 2017	9,990.99	17,683.88	2,162.54	3,827.67	0	474.85	840.49	1,101.15
Sub Total	29,184.57	55,417.27	6,437.52	12,208.15	0	1,475.45	2,806.79	1,101.15
Oct 2017	8,288.42	15,355.75	1,802.97	3,363.65	0	359.69	666.40	0
Nov 2017	5,688.74	11,502.66	1,255.76	2,528.20	0	279.51	565.18	0
Dec 2017	3,607.36	9,036.39	798.51	2,010.81	0	187.08	468.64	0
Sub Total	17,584.52	35,894.80	3,857.25	7,902.66	0	826.30	1,700.23	0
Jan 2018	3,245.67	11,000.08	732.59	2,461.07	0	173.46	583.14	986.46
Feb 2018	2,793.08	9,045.54	637.83	2,063.84	13,215	146.29	473.32	0

Mar 2018	5,352.95	16,449.74	1,161.52	3,594.83	0	273.58	846.10	0
Sub Total	11,391.70	36,495.36	2,531.95	8,119.74	13,215	593.35	1,902.57	986.46
Apr 2018	6,836.47	20,218.74	1,437.38	4,269.89	1,000	308.48	917.86	0
Sub Total	6,836.47	20,218.74	1,437.38	4,269.89	1,000	308.48	917.86	0
Status: Comply								
5.10	Conversion factors							
5.10.1								
Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org); RSPO Rules for Physical Transition of Oleochemicals and its Derivatives. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries								
Question :								
Conversion rates applied accurately?								
Conversion rate applied to provide a reliable estimate for the amount of certified palm product output available form total FFB input. The conversion rate determine based on monthly productions report and ensure accuracy against actual performance average by percentage of certified FFB input.								
Status: Comply								
5.10.2								
Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.								
Question :								
Conversion rates periodically updated?								
Conversion rate is determine based on monthly productions report.								
Status: Comply								
5.11	Claims							
5.11.1								
The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.								
Question :								
Any communication to any stakeholder group / customers issued in accordance with RSPO Rules on Market Communications and Claims?								
The site make claims regarding the use of or support of RSPO certified oil palm products only.								
Status: Comply								
5.12	Complaints							
5.12.1								
The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.								
Question :								

Documented procedures for stakeholders complaints established?	
Procedures for stakeholders complaints established in form of Manual RSPO SCCS <i>Standar sertifikasi rantai pasok RSPO</i> issued on 2 January 2018 revised 2 February 2018. The stakeholders complaints can come from internal or external interested party. Mill shall handle the complaints in one month accordance to the procedure.	
	Status: Comply
5.13	Management review
5.13.1	
The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken	
Question :	
Management reviews performed annually at planned intervals?	
The certificate holder has management review planned at July 2018 after SCCS internal audit that planned in June 2018. OFI	
	Status: OFI
5.13.2	
The input to management review shall include information on:	
<ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard. • Customer feedback. • Status of preventive and corrective actions. • Follow-up actions from management reviews. • Changes that could affect the management system. • Recommendations for improvement. 	
Question :	
Has all input required above has been included in the management review?	
Management review planned at July 2018 after SCCS internal audit that planned in June 2018	
	Status: Comply
5.13.3	
The output from the management review shall include any decisions and actions related to:	
<ul style="list-style-type: none"> • Improvement of the effectiveness of the management system and its processes. • Resource needs. 	
Question :	
Has all output required above has been included in the management review?	
Management review planned at July 2018 after SCCS internal audit that planned in June 2018	
	Status: Comply

3.2.2 (Module E) CPO Mills - Mass Balance Requirements

Clause	(Module E) CPO Mills – Mass Balance Requirements	
E.1	Definition	
<p>E.1.1 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>Lembiru POM has applied Mass balance (Module E). The mill was received FFB from RSPO certified and noncertified sources. FFB Certified sources are Awatan Estate and Lembiru Estate, then FFB uncertified sources are: Karya Palma Estate (PT. SNP), Beturus Estate, Pelanjau Estate, Sungai Putih Estate Plasma (PT. BAL) and also from PT. Andes Agro Investama (Cargil Group).</p>		
<p>Status: Comply</p>		
E.2	Explanation	
<p>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.</p>		
<p>Tonage product certified for period 3 July 2017 to 2 July 2018 are describe at the report (basic info 1.8.1) :</p>		
<p>Period of 3 July 2017 to 2 July 2018 (tonnes/year)</p>		
Products	Estimate	Actual <i>*(period 3 July 2017 to 13 May 2018)</i>
FFB Certified	67,691.42	68,016.05
CSPO	14,215	14,812.73
CSPK	3,385	3,307.879
<p>Estimate product certified CPO and PK for period 7 Juli 2018 to 6 July 2019 describe at ASA 4 report (basic info 1.8.3)</p>		
<p>Status: Comply</p>		
<p>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).</p>		
<ul style="list-style-type: none"> • RSPO IT Platform member registration number: RSPO_PO1000001867 • Certified CPO sold to each buyer period of 3 July 2017 to 2 July 2018 		
Date	Buyer	Volume (Ton)
9 February 2018	Credit allocation (book & claim)	8,215
19 February 2018	Credit allocation (book & claim)	5,000
4 April 2018	Credit allocation (book & claim)	1,000

Total	14,215
<ul style="list-style-type: none"> Certified Palm Kernel sold to each buyer period of 3 July 2017 to 2 July 2018 	
Date	Buyer
7 September 2017	PT. Willmar Nabati (Pelintung)
17 January 2018	PT. Sari Dumai Sejati
Total	2,087.61

Based on plam trace record on 15 May 2018, it is known that the site has remaining volume for CPO certified is 0 ton and certified PK 1,297.39. The site has sold certified CPO at credit allocation (book and claim) for 14,215 ton and certified PK for 2.087.61 ton.

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:

- a. Complete and up to date procedures covering the implementation of all the elements in these requirements;**
- b. 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.**

The Certificate Holder has had the procedure of product identification and traceability at POM number RSPO/66/SCCS/15-SNP dated 26 April 2015 revised 15 May 2017. The procedures established and covering all elements of the supply chain model requirements, records and reports of compliance with supply chain requirements including training records. The procedures also identified role of implementation responsibility persons that trained. RSPO Supply Chain Training held at 1 and 2 March 2018. The person in charge of the POM operationals are the Oil Mill Manager, Assistant of PSQM, Laboratory Foreman/Assistant etc.

Based on the observations and interviews during the field visit at Lembiru POM, it was found that the relevant officers, Security Officers in the Postal area will stamp all the FFBs by entering a stamp on the FFB Consignment Letter during the FFB truck has entered the front area of the Palm Oil Mill before heading to the weighbridge area. The officer on FFB weighbridge put the stamp according to the origin of FFB. If it comes from a certified own plantation (Lembiru and Awatan Estate) then it will be stamped RSPO Certified, and if FFB was from a third party non-certified FFB supplier will be stamped Non RSPO Certified.

Based on the results of visit in Jetty Kelampai bulking it's found the documents submitted CPO and Kernel to the buyer. However, the bulking can not show evidence of RSPO identity of the MB supply chain model on certified product delivery reports as set out in procedure (RSPO / 66 / SCCS / 15-SNP) for sale of RSPO certified products. As an example of Kernel sales to PT. Married Nabati Indonesia with a transaction on palm trace on 7 September 2017 with the shipping kernel invoice No. 0001/BAP-IKS/BLB/VII/2017 dated 22 July 2017 for total volume of 1,101.15 tons. **NC 2018.08**

Status: Non-Conformance with Major Category

E.3.2

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

The Lembiru POM has documented procedures for the receipt and processing of certified and non-certified FFB (RSPO/66/SCCS/15-SNP dated 26 April 2015). The procedure has adjusted from the SCCS standard on November 2014. The person in charge of the POM operationals are the Factory Manager, Assistant of PSQM, Laboratory Foreman/Assistant .

Based on field visit in Lembiru POM shown that the Security in front gate of mill will stamp the all FFB consignment before enter to weight bridge area. It was aim to identified that the FFB loading process included the driver and the vehicle has been check first. In process of FFB received at the area of weight bridge, the person in charge will separated the FFB code with used RSPO Certified Stamp in FFB consignment letter for FFB from the own plantation (Lembiru Estate and Awatan Estate) and input separately in system namely Sime Weight System

Pelanjau Estate (PT. BAL) and Plasma Sungai Putih are currently in the process of certification. The site has an opportunity for improvement (**OFI**) to the separation mechanism between FFB certified (HGU) and FFB non-certificate (non HGU) of Pelanjau Estate after being certified.

Status: OFI

E.4 Purchasing and goods in

E.4.1

The site shall verify and document the volumes of certified and non-certified FFBs received.

The site has verified and documented the volumes of certified and non-certified FFBs received. Certified and non-certified FFB received period of July 2017 to May 2018:

Month	FFB		Total
	RSPO Certified	Non Certified	
July 2017	8,832,120	9,869,067	18,701,187
August 2017	10,361,460	8,670,743	19,032,203
Sept 2017	9,990,990	7,692,890	17,683,880
Oct 2017	8,288,420	7,067,330	15,355,750
Nov 2017	5,688,740	5,813,920	11,502,660
Dec 2017	3,607,360	5,429,030	9,036,390
Jan 2018	3,245,670	7,754,412	11,000,082
Feb 2018	2,793,080	6,252,460	9,045,540
March 2018	5,352,950	11,096,790	16,449,740
April 2018	6,836,470	13,382,270	20,218,740
May 2018	64,997,260	83,028,912	148,026,172

Status: Comply

E.4.2

The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.

Tonage product certified:

Products	Period of 3 July 2016 to 2 July 2017 (tonnes/year)		Period of 3 July 2017 to 2 July 2018 (tonnes/year)	
	Estimate	Actual	Estimate	Actual *(period 3 July 2017 – 13 May 2018)
CSPO	19,131	14,860.712	14,215	14,812.73
CSPK	4,544	2,910.548	3,385	3,307.879

Based on the table it is known that CPO certified production estimated for period of 3 July 2016 to 2 July 2017 were 14,215 ton and CPO certified production actual are 14,812.73 ton. The site has overproduced for CSPO (597.73 ton) and The site has informed to the CB related to the overproduction of certified tonnage by email on 21 May 2018.

	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>								
<p>The Certificate holder has record and balance all received of RSPO FFB and deliveries of RSPO certified CPO and PK on three monthly basis. The Volume of certified CPO and PK are delivered from accounting system according to conversion by percentage of FFB certified. The sales of RSPO product claim are sold from a positive stocks.</p>								
<p>FFB, CPO and PK with a three-monthly basis in accordance with the applicable SOP of Mass Balance:</p>								
	FFB Received		CPO Production			PK Production		
Month	Certified	Total FFB	Certified	Total	Book & claim	Certified	Total	RSPO Claim
Jul 2017	8,832.12	18,701.18	1,882.17	3,985.32	0	457.54	968.80	0
Aug 2017	10,361.46	19,032.20	2,392.80	4,395.16	0	543.05	997.50	0
Sep 2017	9,990.99	17,683.88	2,162.54	3,827.67	0	474.85	840.49	1,101.15
Sub Total	29,184.57	55,417.27	6,437.52	12,208.15	0	1,475.45	2,806.79	1,101.15
Oct 2017	8,288.42	15,355.75	1,802.97	3,363.65	0	359.69	666.40	0
Nov 2017	5,688.74	11,502.66	1,255.76	2,528.20	0	279.51	565.18	0
Dec 2017	3,607.36	9,036.39	798.51	2,010.81	0	187.08	468.64	0
Sub Total	17,584.52	35,894.80	3,857.25	7,902.66	0	826.30	1,700.23	0
Jan 2018	3,245.67	11,000.08	732.59	2,461.07	0	173.46	583.14	986.46
Feb 2018	2,793.08	9,045.54	637.83	2,063.84	13,215	146.29	473.32	0
Mar 2018	5,352.95	16,449.74	1,161.52	3,594.83	0	273.58	846.10	0
Sub Total	11,391.70	36,495.36	2,531.95	8,119.74	13,215	593.35	1,902.57	986.46
Apr 2018	6,836.47	20,218.74	1,437.38	4,269.89	1,000	308.48	917.86	0
Sub Total	6,836.47	20,218.74	1,437.38	4,269.89	1,000	308.48	917.86	0
	Status: Comply							
E.5.2								
<p>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.</p>								
<p>Until ASA-04, the Lembiru POM has no cooperated with the independent outsource palm kernel crushers.</p>								
	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	<p>The PT Sandika Natapalma - Lembiru POM has had approval/permit the use of the certificate with the number MUTU-RSPO/044</p> <p>PT Sandika Natapalma do not use RSPO trademark and CB Logo. Sime Darby Plantation Bhd Trademark License Number RSPO-1106024 Can be seen at: https://www.rspo.org/trademark/current-licensees</p>	✓
	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	<p>The PT Sandika Natapalma - Lembiru POM has had approval/permit the use of the certificate with the number MUTU-RSPO/044</p> <p>PT Sandika Natapalma do not use RSPO trademark and CB Logo. Sime Darby Plantation Bhd Trademark License Number RSPO-1106024 Can be seen at: https://www.rspo.org/trademark/current-licensees</p>	✓
	Status: Comply	
3.	Implementation of Certificate and Logo is not used on product	X or ✓
ASA-4	<p>The PT Sandika Natapalma - Lembiru POM has had approval/permit the use of the certificate with the number MUTU-RSPO/044</p> <p>PT Sandika Natapalma do not use RSPO trademark and CB Logo. Sime Darby Plantation Bhd Trademark License Number RSPO-1106024 Can be seen at: https://www.rspo.org/trademark/current-licensees</p>	✓
	Status: Comply	
4.	Controlling of Certificate and Logo, including withdrawing inappropriate logo.	X or ✓
ASA-4	<p>The PT Sandika Natapalma - Lembiru POM has had approval/permit the use of the certificate with the number MUTU-RSPO/044</p> <p>PT Sandika Natapalma do not use RSPO trademark and CB Logo. Sime Darby Plantation Bhd Trademark License Number RSPO-1106024 Can be seen at: https://www.rspo.org/trademark/current-licensees</p>	✓
	Status: Comply	

3.4. Summary of RSPO Partial Certification.

Compliance of the uncertified management units of Sime Darby Plantation Sdn Bhd 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

Sime Darby Plantation Sdn Bhd Time Bound Plan is explained in table section 1.10. Sime Darby has achieved 34 management units in Malaysia and 24 Management Units in Indonesia that RSPO certified. Total management unit in Sime Darby Plantation Sdn Bhd are 34 in Malaysia, 25 in Indonesia and 1 in Liberia. Sime Darby Plantation Sdn Bhd has informed the Time Bound Plan progress through representative's office in Indonesia. MUTU has considered that Sime Darby Plantation Sdn Bhd is comply with the RSPO requirement for Time Bound Plan. The Time Bound Plan was revised and declared by the Sime Darby Plantation Sdn Bhd Indonesian representative on June 16th, 2016 by the Head of PSQM.

MUTU has verified partial certification for un-certified unit's subsidiary of Sime Darby Plantation Sdn Bhd based on their Time Bound Plan. 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 significant land conflicts in PT Mitra Austral Sejahtera, there is still an issue that remain unresolved social i.e. from Serikat Petani Kelapa Sawit (SPKS), but improvements are ongoing.
- PT Budidaya Agro Lestari waiting for land title process.
- The company has follow RSPO requirement related to New Planting Procedure and Remediation and Compensation Procedure.
- There is 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
2.2.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p>Company Group/Holding Statement: Companies are already doing internal audits. There are internal audit reports for each company.</p> <p>Auditor Verification: Internal Audit report available for uncertified management unit for example PT Sandika Natapalma – Karya Palma Estate on 10 February 2017.</p>
i.	No replacement after dates defined in NIs Criterion 7.3 of: <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>Company Group/Holding Statement: HCV assessment has been conducted for uncertified units i.e. PT Mitra Austral Sejahtera (by Aksenta in March 2009) and Sime Darby Plantation Liberia operations (by RSPO approved assessors – Dr SK Yap in 2011).</p> <p>Auditor Verification: Sime Darby Plantation Sdn Bhd sent disclosure of liability including LUCA analysis to RSPO Secretariat on 2 December 2014 and 2nd revision on 24 June 2016. The companies ensuring reporting of disclosure of liability progress to</p>

		RSPO and according to the CB's correspondency with RSPO Remediation and Compensation.
i.	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>Company Group/Holding Statement: A new mill will be set up in Liberia and planned for commissioning in February 2016. Preparation to undergo the RSPO Certification process is in progress and SDP targets to undergo RSPO Certification by end 2017. RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps is in progress. *Note: RSPO NPP Announcements for SDP can be found at http://www.rspo.org/certification/new-planting-procedures/public-consultations/page/14</p> <p>Auditor Verification:</p> <ul style="list-style-type: none"> • Karya Palma Estate (PT Sandika Natapalma) and Baturus Estate (PT Budidaya Agro Lestari) any new planting after January 1st 2010 and due to not conduct NPP. • RSPO NPP process has been completed in 2011 for a new mill in Liberia.
ii.	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>Company Group/Holding Statement: Sime Darby (Liberia) Plantation Inc. Status: Box G - Close for Monitoring Further details please refer to: http://www.rspo.org/members/complaints/status-of-complaints/view/46 PT Mitra Austral Sejahtera (Sime Darby Sdn Bhd) Further details please refer to: http://www.rspo.org/members/complaints/status-of-complaints/view/29</p> <p>Auditor Verification: Auditor has verified the supporting evidence of above the company statement. There are land conflict in :</p> <ul style="list-style-type: none"> • PT Mitra Austral Sejahtera, this issue are remain being resolved with RSPO dispute settlement facilities • PT Bina Sains Cemerlang, this issue was raise on 22 April 2017 and still being process to resolve.
iii.	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	<p>Company Group/Holding Statement: No stakeholder comments or complaints received.</p> <p>Auditor Verification:</p>

		Auditor has verified the supporting evidence of above the company statement. There are no labour dispute in company unit.
iv.	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	<p>Company Group/Holding Statement: None noted. No stakeholder comments or complaints received.</p> <p>Auditor Verification: Auditor has verified the supporting evidence of above the company statement. There is any legal non-compliance for company under SDP waiting for land title process, ie:</p> <ul style="list-style-type: none"> • PT Sime Indo Agro 1,652 Ha • PT Aneka Inti Persada 421.31 Ha • PT Bina Sains Cemerlang 308.25 Ha • PT Bersama Sejahtera Sakti 765 Ha • PT Langgeng Muaramakmur 1,162 Ha • PT Paripurna Swakarsa 1,120 Ha • PT Swadaya Andika 63 Ha • PT Bahari Gembira Ria 1,639 Ha • PT Guthrie Pecconina Indonesia 4,133 Ha • PT Perkasa Subur Sakti 1,286 Ha

3.5 Identification of Findings, Corrective Action, Observations, Opportunity for Improvement and Noteworthy Positive Components.

3.5.2 Identification of Findings, Corrective Actions and Observations at ASA-3

NCR No.	: 2017.01	Issued by	: Rizliani Aprianita Hasibuan
Date Issued	: 21 April 2017	Time Limit	: ASA-4
NC Grade	: Minor	Date of Closing	: 20 Februari 2018
Ref. Standar & Persyaratan	: 1.1.1 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.		
Non-Conformance Description & Evidence observed (filled by auditor):			
<ul style="list-style-type: none"> • Certificate Holder has not been able to show evidence of registration of contract worker to the Manpower Agency of Ketapang Regency • Certificate Holder already has a list of updated stakeholders every 6 months. However, based on the verification of incoming mail, there are Stakeholders that have not been updated in the Stakeholder List. 			
Root Cause Analysis (filled by organization audited):			
<p>The occurrence of internal restructuring of the Regional Office The operational unit has reported to the Office Region c / q HRM Dept. However, because there was a restructuring of the reporting previously carried out by HRM, HRM was not followed up, and submitted by their respective units to report directly to the Manpower Agency. In the last updated list of stakeholders experienced delays in updating</p>			
Corrective Action (filled by organization audited):			
<p>Report to the Manpower Agency of Ketapang Regency. Update PT SNP Stakeholder List.</p>			
Preventive Action (filled by organization audited):			
<p>Management determines Area Controller Staff as the person in charge of reporting of mandatory employment periodic report(once a year) Make a schedule / reminder of stakeholder updates that are known by the PSD Manager</p>			
Assessor Evaluation and Conclusion (filled by auditor):			
20 February 2018			
<p>The certificate holder has sent proof of improvement consisting of:</p> <ul style="list-style-type: none"> - Letter No. 068 / LBF-Marau / Ext / V / 2017, dated May 28, 2017 concerning PT SNP-Lembiru Factory's active workforce in 2017 - List of stakeholders of PT SNP and PT BAL, update February 2018 - Letter No: IM-001 / SOU13 / I / 2018, dated January 5, 2018 from the chairman of SOU 13 Lembiru to the Head of Operations Unit, regarding the appointment of PIC reporting on PKWT registration at Disknaer Ketapang - Procedure for updating stakeholder data in Marau area in 2018 <p>Based on the information above, it has been closed.</p>			
Verified by	: Oktovianus Rusmin		

NCR No.	: 2017.02	Issued by	: Andi Pratama Pasaribu
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Date Issued	: 21 April 2017	Time Limit	: 20 June 2017
NC Grade	: Major	Date of Closing	: 12 June 2017
Standard Ref. & Requirement	3.1.1 A documented management plan, a minimum of three years shall be available, including, where appropriate, plan for scheme smallholders		
Non-Conformance Description & Evidence observed <i>(filled by auditor):</i> The company has showed long-term planning covering projection of production, capital expenditure, replanting plan, high quality seed, extraction rate, CPO/PK production, throughput and production cost. However, they did not show the financial indicator (price estimation and profit), expansion (area, mill capacity, infrastructure and social facility) yet.			
Root Cause Analysis <i>(filled by organization audited):</i> Data regarding to financial indicator (e.g prices estimation, profit, etc) only available in Head Office and not regularly compose in operation unit.			
Corrective Action <i>(filled by organization audited):</i> Improving communication with Accounting Department to get financial data.			
Preventive Action <i>(filled by organization audited):</i> Asking Chairman SOU 13 to requesting financial data regarding to Accounting Department every Forecast Year.			
Assessor Evaluation and Conclusion <i>(filled by auditor):</i> Verification on 5 June 2017 Certificate holder has shown longterm business plan period 2020 – 2021 that has been approved by Chairman SOU 13 Lembiru. It document consist data of estimated production, extraction, production cost, prices, gross income, net income etc. therefore, it does not consist projection of expansion (hectarage, mill capacity, infrastructure, social facility etc). Based on the data, nonconformities still open. Verification on 12 June 2017 Certificate holder has shown the additional data regarding to longterm business plan that signed by Chairman SOU 13, Factory manager and PSQM Manager area Kalimantan and Sulawesi. It consist explanation that in the next 5 year there are no expansion (estate or mill). Auditor Conclusion Based on the explanation, it non conformity has closed .			
Verified by	: Andi Pratama Pasaribu		

NCR No.	: 2017.03	Issued by	: Andi Pratama Pasaribu
Date Issued	: 21 April 2017	Time Limit	: ASA-4
NC Grade	: Minor	Date of Closing	: 26 Februari 2018
Standard Ref. & Requirement	4.5.1 Monitoring of Integrated Pest Management (IPM) plan implementation shall be available		
Non-Conformance Description & Evidence observed <i>(filled by auditor):</i> In the Agricultural Reference Manual (ARM) has been mentioned potentially pests, among others: bag worm, nettle caterpillar, rat and oryctes. The procedure describes the frequency for Palm Leaf Eating Caterpillar observation under			

normal conditions ie every one month, while for mice is every 3 months. Awatan Estate have not been able to show sufficient evidence regarding regular pest monitoring in accordance with the Agricultural Reference Manual.

Root Cause Analysis *(filled by organization audited):*

The management unit has observed UPDKS according to ARM, but the evidence of the implementation of pest observations on a regular basis in the form of monitoring documents has not been well documented. Observation documents are not stored properly so it is difficult to trace their availability when needed

Corrective Action *(filled by organization audited):*

The management unit makes special storage files for pest compliance documents stored on the Estate Office's

Preventive Action *(filled by organization audited):*

The Estate Manager instructs to document the results of the installation in a special storage file once a month is verified by the assistant division.

Assessor Evaluation and Conclusion *(filled by auditor):*

17 February 2018

The certificate holder has sent proof of improvement consisting of:

- Letter No: IM-001 / LBE / I / 2018 dated 5 Januari 2018 from EM Lembiru to the mantri of HPT Lembiru Estate regarding the archiving instructions of the HPT monitoring documents in the LBE Office
- Letter No. IM-001 / AWE / I / 2018 dated 5 Januari 2018 from EM Lembiru to the mantri of HPT Awatan Estate regarding the archiving instructions of the HPT monitoring documents in the AWE Office
- Picture: provision of Special Map in the Estate Office

However, there has not been any evidence of the results of regular pest compliance according to ARM

26 February 2018

The certificate holder has sent proof of improvement in the form of pest observations at AWE and LBE for the period January 2018, based on the information above, the above non-conformity is stated to have been closed.

Verified by : **Oktovianus Rusmin**

NCR No.	: 2017.04	Issued by	: Andi Pratama Pasaribu
Date Issued	: 21 April 2017	Time Limit	: ASA-4
NC Grade	: Minor	Date of Closing	: 20 Februari 2018
Standard Ref. & Requirement	<p>4.6.4 The evidence shall be available to demonstrate that use of Pesticides, categorized in Class 1A or 1B by World Health Organization, or those are listed in the Stockholm and Rotterdam Conventions, and paraquat are not used, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimized and eliminated as part of a plan, and shall only be used in exceptional circumstances.</p>		
<p>Non-Conformance Description & Evidence observed <i>(filled by auditor):</i> The Company already has a Sime Darby Responsible Agriculture Charter document (September 2016), which explains that it will implement an integrated pest management program by not using paraquat or chemicals belonging to WHO 1A group. Group 1B WHO will be gradually reduced in accordance with the conventions of Rotterdam and Stocholm. Based on data of pesticide usage of PT Sandika Natapalma 2014, 2015 and 2016 it is known that there is still record of rodenticide use with active ingredient of Warfarin (class 1B) and not enough evidence of the reduction of rodenticide use in accordance with Sime Darby Responsible Agriculture Charter.</p>			
<p>Root Cause Analysis <i>(filled by organization audited):</i> The existing PT Sandika Natapalma Rodenticide is aging stock (stock procurement before September 2016) which will be spent in 2016. The next period of stock chemical procurement requires the existing stock to be realized first</p>			

Corrective Action <i>(filled by organization audited):</i> Realizing available rodenticide applications from aging stock so that the Warafrin stock becomes zero.	
Preventive Action <i>(filled by organization audited):</i> The management of PT SNP through Ka SOU Lembiru coordinated by submitting a letter to the Dept. Purchasing regarding termination of procurement of stock 1A and 1B class chemical.	
Assessor Evaluation and Conclusion <i>(filled by auditor):</i> 20 February 2018 The certificate holder has sent proof of improvement: <ul style="list-style-type: none"> - Letter No: IM-002 / SOU13 / I / 2018 dated January 25, 2018 from the chairman of SOU 13 to KTB purchasing RO staff regarding the termination of stock chemicals which belong to groups 1A and 1B. The letter stated that the company would stop 1A and 1B after the stock had run out - PT SNP rodenticides recording June 2016-February 2017 Based on the information above, the above non-conformity is stated to have been closed	
Verified by	: Andi Pratama Pssaribu

NCR No.	: 2017.05	Issued by	: Andi Pratama Pasaribu
Date Issued	: 21 April 2017	Time Limit	: ASA-4
NC Grade	: Minor	Date of Closing	: 20 Februari 2018
Standard Ref. & Requirement	: 4.6.5 Evidence of pesticide application by trained person and in accordance with application guidelines in product label and storage guidelines shall be available. Appropriate safety equipment shall be provided and utilized. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7).		
Non-Conformance Description & Evidence observed <i>(filled by auditor):</i> Field observations in chemical storage warehouses Lembiru known chemicals have been equipped with the corresponding MSDS. However, at the time of observation to Awatan Estate (AWE) found Pesticide trademark Kencepat not yet equipped with MSDS.			
Root Cause Analysis <i>(filled by organization audited):</i> There is no examination of the availability of MSDS			
Corrective Action <i>(filled by organization audited):</i> Complement the pesticide MSDS			
Preventive Action <i>(filled by organization audited):</i> MSDS checks are carried out by the warehouse head in each update of stock recording on the Warehouse Card			
Assessor Evaluation and Conclusion <i>(filled by auditor):</i> 20 February 2018 The certificate holder has sent proof of improvement consisting of the Quick MSDS released by the relevant manufacturer and completed the warehouse card form with a checklist of MSDS availability. Based on the information above, the above non-conformity is stated to have been closed			
Verified by	: Andi Pratama Pasaribu		

NCR No.	: 2017.06	Issued by	: Andi Pratama Pasaribu
Date Issued	: 21 April 2017	Time Limit	: 21 June 2017
NC Grade	: Major	Date of Closing	: 9 August 2017
Standard Ref. & Requirement	: 4.7.3 Records of Occupational Health and Safety (OHS) program (see 4.8) and Personal Protective Equipment (PPE) training in accordance with the result of hazard identification and risk analysis shall be available to all workers		
Non-Conformance Description & Evidence observed <i>(filled by auditor):</i>			
<p>Company showed record of OHS training and PPE used that held on April 20th 2017. However, based on field observation known that several risk control that not implemented yet:</p> <ul style="list-style-type: none"> • Based on field observation in herbicide application in block D5 Division 1 Lembiru Estate (LBE) found a pesticide applicator using unsafe wear that potential to skin contaminated. • Lembiru factory: <ol style="list-style-type: none"> 1. Welding activity in height not equipped with maintenance sign in that area. Moreover, the welder not using adequate PPE (body harness, welding glasses and hand gloves). 2. One of power plant operator did not using ear muff. • Based on document observation, Awatan Estate not shown PPE distribution and first aid kit monitoring in each unit yet. 			
Root Cause Analysis <i>(filled by organization audited):</i>			
<ul style="list-style-type: none"> • HIRARC document just explain PPE for pesticide applicator. Risk assessment not set working uniform yet. • Lembiru Factory: <ol style="list-style-type: none"> 2. PPE purchasing requested periodically (once a year). If any PPE broken, it will change with the new one. In case of audit findings, user has reported to the his foreman, therefore purchasing has still on progress. 3. Generator operator in Lembiru Factory divided in 2 shift. The company has provide only one earmuff to used interchangeably. During the audit, earmuff has not given by previous operator. • Certificate holder not yet provide special place to keep document regarding to PPE distribution and first aid kit. 			
Corrective Action <i>(filled by organization audited):</i>			
<ul style="list-style-type: none"> • Conducting socialization to all pesticide applicator to use closed work clothes even has using PPE. • Lembiru Factory: <ol style="list-style-type: none"> 1. Completed welder that work in height with adequate PPE and safety sign. 2. Providing ear muff to all genset operator. • Providing PPE distribution and first aid kit monitoring document. 			
Preventive Action <i>(filled by organization audited):</i>			
<ul style="list-style-type: none"> • Conducted review and revise HIRAC especially for spraying activity. • Conducted PPE completeness and monitoring every day. • Preparing special place to keep document regarding to PPE distribution and first aid kit. 			
Assessor Evaluation and Conclusion <i>(filled by auditor):</i>			
Verification on 5 June 2017.			
<ul style="list-style-type: none"> • Certificate holder has shown the HIRAC review for pesticide application. Through the document, risk management has consist apron usage and closed work clothes. Beside that, it also shown socialization regarding to safety induction to entire pesticide applicator in Awatan Estate. However, still not ensure it socialization has conducted to all pesticide applicator. • Lembiru Factory : <ol style="list-style-type: none"> 1. Welder has completed with body harness, safety goggles and safety gloves. Beside that, welder activity has using safety sign. 2. All genset operator has completed with ear muff. 			

- Certificate holder has shown the PPE giving to all harvester in Awatan Estate on May 2017. Beside that, they also provide special place to keep document regarding to PPE distribution and first aid kit.

Verification on 14 June 2017.

The company has shown corrective evidence as follows:

- OHS training to all pesticide applicator that conducted on 7 June 2017.
- PPE consistency monitoring (will observed in the next ASA).
- Intern Office Memo from each estate clerkon 9 June 2017 that explain appointment of first aid kit monitoring officer.

Major NCR Re Verification

09 August 2017

Based on field observation in Lembiru Mill workshop shown that entire mill operator has using PPE. For example, genset operator has using safety shoe, helm, ear muff and safety gloves.

10 August 2017

- Based on field observation in chemical weeding in Awatan Estate (Block P01) and Lembiru Estate (Block E8), entire worker has equipped with adequate PPE (apron, safety gloves, safety google and masker).
- The monitoring of first aid kita on July 2017 in Awatan Estate, Lembiru Estate and Lembiru Mill.
- All chemical weeding foreman has equipped with first aid kit (complete item according to regulation).
- Based on document verification, whole first aid kit monitoring officer each estate.

Auditor Conclusion

Through all corrective evidence that showed, this nonconformity has been **closed**.

Verified by : **Oktovianus Rusmin**

NCR No.	: 2017.07	Issued by	: Andi Pratama Pasaribu
Date Issued	: 21 April 2017	Time Limit	: ASA-4
NC Grade	: Minor	Date of Closing	: 10 August 2017
Standard Ref. & Requirement	: 4.7.5 A procedure for emergency and work accident shall be available in Indonesian Language; and the workers, who have attended First Aids training, are available in the working areas.		
Non-Conformance Description & Evidence observed <i>(filled by auditor):</i> Based on field observation and interview with several worker found that: 1) BSS supervisor in Awatan Estate still not quite understood and demonstrated of first aid kit used. 2) First aid kit box did not comply with labor ministry decree no. 15 year 2008. 3) The company has not provided monitoring and note of first aid kit of BSS in LBE, AWE yet. 4)			
Root Cause Analysis <i>(filled by organization audited):</i> 1. First aid kit usage training did not trained yet 2. Regular monitoring did not conducted yet. 3. Chemical weeding foreman has been appointed to brought first aid kit during work. However, they still not appointed to monitored first aid kit containt.			
Corrective Action <i>(filled by organization audited):</i> 1. Conducted first aid kit training. 2. Completed first aid kit item according to the regulation. 3. Completed first aid kit box with content list and monitoring document.			
Preventive Action <i>(filled by organization audited):</i> 1. Conducting first aid kit training regularly and put it into the annual training list.			

<p>2. Added chemical weeding foreman duty to monitored first aid kit contents.</p> <p>3.</p>
<p>Assessor Evaluation and Conclusion <i>(filled by auditor):</i></p> <p>Verification on 16 June 2017</p> <p>1. Certificate holder has shown corrective action document regarding to first aid kit content and appointed chemical weeding foreman as PIC to monitored first aid kit according to Intern Office Mail from estate manager. However, There is insufficient evidence that the certificate holder has identified how many BSS foremen carrying the first aid kit and have confirmed the first aid to each BSS foreman.</p> <p>2. Certificate holder has appointed first aid kit training record that held on 20 April 2017 who attended by 34 Marau Zone field supervisor.</p> <p>Verification on 20 June 2017</p> <p>1. based on management justification there is only one Block Spraying System (BSS) team in each estate. The company has shown the first aid kit minutes handover in Awatan and Lembiru Estate.</p> <p>2. The company has shown socialization of all pesticide MSDS that held on 19 June 2017. Including the environmental risk information during application.</p> <p>Major Verification 10 August 2017</p> <p>Based on field observation in Awatan and Lembiru Estate found that:</p> <ul style="list-style-type: none"> • Chemical weeding foreman in each estate has described first aid kit well and known that impact of first aid kit from company's doctor. • First aid kit monitoring document on July 2017. • All chemical weeding foreman has completed with first aid kit according to regulation. <p>Auditor Conclusion</p> <p>Through all corrective evidence that showed, this nonconformity has been closed.</p>
<p>Verified by : Oktovianus Rusmin</p>

NCR No. :	2017.08	Issued by :	Andi Pratama Pasaribu
Date Issued :	21 April 2017	Time Limit :	ASA-4
NC Grade :	Minor	Date of Closing :	9 August 2017
Standard Ref. & Requirement :	4.7.6 All workers shall be provided with medical care, and covered by accident insurance (see criterion 6.5.3).		
<p>Non-Conformance Description & Evidence observed <i>(filled by auditor):</i> Company has not been able to show registration of social health insurance for contract worker of Awatan Estate.</p>			
<p>Root Cause Analysis <i>(filled by organization audited):</i> Half contract worker does not have his own citizen data as a requirement for medical insurance.</p>			
<p>Corrective Action <i>(filled by organization audited):</i> Registering contract workers who have complete administrative requirements.</p>			
<p>Preventive Action <i>(filled by organization audited):</i> Provide time for workers who have not completed the administrative requirements for 6 months and confirm to contract workers who do not complete the terms will be terminated contract.</p>			
<p>Assessor Evaluation and Conclusion <i>(filled by auditor):</i> Verification on 16 June 2017.</p>			

Certificate holder has shown Intern Office Mail dated on 12 June 2017 No. 32/A/EM AWE-INT/VI/2017 regarding to medical insurance registration. It asking all employee to completed the requirement for medical insurance. Based on this, the inconsistency in this indicator is not fulfilled because there is no objective evidence in the form of membership card BPJS (**Open**).

Verification on 20 June 2017.

The certificate holder shown an email regarding Registration of BPJS, but there is not enough evidence from the email to contain information such as: Participant Registration Number and Participant Name already registered.

Major verification on 9 August 2017

Has been shown proof of improvement in the form of membership card BPJS for 5 people PKWT in Awatan Estate. For example



The card already contains information, including: Membership Number, Participant Personal Data (Name and Date of Birth), and others.

Auditor Conclusion

Based on this, the Non-conformance on the indicator has been **Fulfilled**.

Verified by : **Oktovianus Rusmin**

NCR No.	: 2017.09	Issued by	: Andi Pratama Pasaribu
Date Issued	: 21 April 2017	Time Limit	: 20 June 2017
NC Grade	: Major	Date of Closing	: 16 June 2017
Standard Ref. & Requirement	: 4.8.1 Records of training program related to the aspects of RSPO Principles and Criteria shall be available		
Non-Conformance Description & Evidence observed <i>(filled by auditor):</i>			
The company could not show proof of training records related to aspects of the RSPO principles and criteria for all levels of employees (staff, workers, smallholders and contract workers).			
Root Cause Analysis <i>(filled by organization audited):</i>			
Certificate holder not evaluated the program and realization training yet so that the completion or achievement of the program is not systematic and not monitored its implementation.			
Corrective Action <i>(filled by organization audited):</i>			
Finished the training program before entering the new program.			
Preventive Action <i>(filled by organization audited):</i>			
The new training program period 2017 – 2018 will pay attention to the Evaluation of Training Program Implementation 2016-2017 known by SOU Chairman.			

Assessor Evaluation and Conclusion *(filled by auditor):*

Verification on 14 June 2017.

Certificate holder has shown corrective evidence as follows:

- Evaluation of training program & Human Resources Development Training Document Marau Zone period 2016/2017.
- Block Harvesting System training documentation on 15 May 2017.
- Block Manuring System training documentation on 15 May 2017.
- Block Spraying System training documentation on 15 May 2017.
- Integrated Pest Management Training and High Conservation Value training documentation on 15 May 2017.
- Sime Card Training Documentation on 15 May 2017.
- Emergency response training documentation on 15 May 2017.

However, there is no training documentation that held in Lembiru mill.
Based on that fact, it non conformity still not fulfilled.

Verification on 16 June 2017.

The certificate holder has shown the fire fighting simulation in Lembiru Mill on May 16, 2017 which was attended by 52 participants. There is also a photo's of the training.


Auditor Conclusion

Through all corrective evidence that showed, this nonconformity has been **closed**.

Verified by : Rizliani Aprianita Hasibuan

NCR No.	: 2017.10	Issued by	: Radytio Puspanjana
Date Issued	: 21 April 2017	Time Limit	: ASA – 4
NC Grade	: Minor	Date of Closing	: 26 Februari 2018
Standard Ref. & Requirement	: 5.2.3 Program (s) to socialize the status of protected, rare, threatened or endangered (RTE) to all workers shall be available, including records of appropriate sanction disciplinary measures to any individual working for the company who is found to capture, harm, collect or kill these species.		
Non-Conformance Description & Evidence observed <i>(filled by auditor):</i> The company has been displaying HCV management training program in July 2016 to June 2017, regarding the status of protected, rare, threatened, and endangered species to all workers both employees and staff. However, the evidence of the realization record of the program has not been shown.			
Root Cause Analysis <i>(filled by organization audited):</i> The training program is realized partially by division per division by one facilitator. During the audit, the program was only realized in 5 of the 7 existing divisions (AWE 3 divisions and LBE 4 Divisions) so that the record of program implementation could not be compiled in full.			
Corrective Action <i>(filled by organization audited):</i> Complete the remaining programs that have not been realized.			
Preventive Action <i>(filled by organization audited):</i> The new program July 2017 - June 2018 is prepared with a plan for centralized realization in one estate so that the implementation becomes more efficient.			

Assessor Evaluation and Conclusion <i>(filled by auditor):</i> 26 Februari 2018 The certificate holder has sent proof of improvement such as: - December 2017 HCV training minutes in Lembiru Estate and Estate Awareness - Documentation of training implementation - Training programs for internal and external parties and a list of 17/18 PT SNP program facilitators or trainers Based on the information above, the above non-conformity is stated to have been closed	
Verified by	: Oktovianus Rusmin

NCR No.	: 2017.11	Issued by	: Radytio Puspanjana
Date Issued	: 21 April 2017	Time Limit	: 20 June 2017
NC Grade	: Major	Date of Closing	: 9 August 2017
Standard Ref. & Requirement	: 5.3.2 All chemicals and their containers shall be disposed of responsibly.		
Non-Conformance Description & Evidence observed <i>(filled by auditor):</i> Basen on field visit at Lembiru POM there was found hazardous waste : <ul style="list-style-type: none"> - Oil Filter and Used Oil package in area behind the mill - Expired chemical material in mill chemical warehouse 			
It is not comply to government regulations No. 101 year 2014 about Hazardous waste management and SOP Hazardous and Non-hazardous waste management (SPO-01-17-PLB3 & NON B3-SNPBAL)			
Root Cause Analysis <i>(filled by organization audited):</i> <ul style="list-style-type: none"> • There was found waste material of oil filter and oil package as are residual from contractor excavator operational which worked in mill area. Mill management never done socialization related to hazardous waste handling from residual of operational activities • Chemical warehouse officer did not understand about expired chemical handling. Mill management never give socialization to storage officer related to expired chemical handling. 			
Corrective Action <i>(filled by organization audited):</i> <ul style="list-style-type: none"> • Clean up the area behind the mill and ask contractor to take all hazardous waste from residual of their operational activities back to their base. • Carry over the expired chemical material to hazardous waste storage and record it to hazardous waste log book. 			
Preventive Action <i>(filled by organization audited):</i> <ul style="list-style-type: none"> • Conduct socialization to all contractors in Mill area about hazardous waste management from residual of their operational activities. 			

- Conduct socialization to chemical storage to responsible person related to expired chemical material in chemical storage.

Assessor Evaluation and Conclusion *(filled by auditor):*

Verification 5 June 2017

Company show evidence :

- Hazardous waste management socialization records housed in Lembiru Mill on 14th May 2017 to all contractors in Mill area. The socialization is about waste hazard classification, hazardous waste type based on source and characteristic, and general hazardous waste management.
- Socialization records of Chemical management at chemical storage on 14th May 2017 to warehouse officers. The socialization is about waste hazard classification, hazardous waste type based on source and characteristic, and general hazardous waste management.
- Expired chemical material had been recorded on expired chemical log book in hazardous waste warehouse period May – August 2017 as much as 30 ltrs signed by hazardous waste officer.
- Had been shown corrective evidence related to findings used oil filter and used oil package in area behind the mill in form of the photo of clean area behind the mill, but still not found evidence that hazardous waste been recorded in accordance with the procedure (No : 301/SNP-LB3-03/11) which regulate to hazardous waste storage guidance. On point 6.6.3, the procedure tells that hazardous waste handled and controlled must be recorded by hazardous waste warehouse officer and reported to management and related agencies.

Based on the statement, Non-compliance **No. 2017.11 not compliance. Has not been comply**

Verification 12 June 2017

Had been shown corrective evidence related to findings used oil filter and used oil package in area behind the mill. Corrective follow up which had been done is hazardous waste record which produced by Lembiru Mill/Excavator contractors and had been known by Lembiru Mill Manager (dated 7 June 2017).

Based on the statement, non-compliance has been declared **Closed with Observation** and will be consistently observed its application on re-certification Major (site visit)..

Major NCR Re-verification

9 August 2017

Based on field observation in Lembiru Mill area:

- There was no found unlicensed hazardous waste which been stored
- In hazardous waste storage had been done grouping between liquid and solid waste, and had been equipped with symbols, SOP on bulletin board, hazardous balance sheet until 2017, and eye shower. Had been shown a several record evidence:
 - Hazardous waste management report 2nd quarter (april to June 2017) and proof of report submission to related agencies namely public housing, residential, and environment agency Ketapang Regency dated 17 July 2017.
 - Hazardous manifest document No. AGU 0003867 & AGU 0003868 (each for solid waste) and No. AGU 0003671 (for liquid waste), dated 3 June 2017.
- In chemical warehouse, there's no found expired chemical material and had been equipped with symbols, SOP on bulletin board, stock list, and eye shower.

Based on evidence was showed, the non conformance in this indicator was Closed

Verivied by : **Oktovianus Rusmin**

NCR No.	: 2017.12	Issued by	: Yohanes Hardian
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Date Issued	: 21 April 2017	Time Limit	: ASA-4										
NC Grade	: Minor	Date of Closing	: 14 May 2018										
Standard Ref. & Requirement	: 5.6.3 A monitoring plan and results of regular reporting on emission and pollutants from estate and mill operations using appropriate methods, shall be available.												
Non-Conformance Description & Evidence observed <i>(filled by auditor):</i> CH cannot show calculating the greenhouse gas balance from mill and estates refers to the applicable with RSPO standards through the use Palm GHG calculator vers 3.1													
Root Cause Analysis <i>(filled by organization audited):</i> RSPO GHG calculations are carried out by the Jakarta PSQM team. The counting process is hampered due to the delay in collecting data from the operational unit to the Jakarta PSQM team													
Corrective Action <i>(filled by organization audited):</i> Send data needed for RSPO GHG calculations. The results of calculations have been submitted by the Jakarta PSQM team and have been reported to the RSPO secretariat													
Preventive Action <i>(filled by organization audited):</i> Affirmation by the Chair of the SOU to the operational unit to deliver GHG supporting data on time to the Jakarta PSQM team													
Assessor Evaluation and Conclusion <i>(filled by auditor):</i> 14 May 2018 Lembiru POM and supply bases has calculated GHG emissions for period 2017 using the RSPO PalmGHG calculator, as follow as:													
<table border="1"> <thead> <tr> <th>Emmission per product</th> <th>tCO2e/tProduct</th> </tr> </thead> <tbody> <tr> <td>CPO</td> <td>5.76</td> </tr> <tr> <td>PK</td> <td>5.76</td> </tr> </tbody> </table>				Emmission per product	tCO2e/tProduct	CPO	5.76	PK	5.76				
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Land use	Ha												
Planted area	11350.34												
Planted on peat	0												
Conservation (forested)	0												
Conservation (non-forested)	735.1												
Summary of field emission and Sinks													
Descripton	Own plantation		Group plantation		3rd party								
Emissions Sources	tCO2e	tCO2e/tFFB	tCO2e	tCO2e/tFFB	tCO2e	tCO2e/tFFB							
Land conversion	12034.7	0.09	0	0	2879.3	0							

CO2 emmisions from fertilizer	304054.93	2.2	0	0	4664.6	0
NO2 emissions	9230.57	0.07	0	0	1806.25	0
Fuel comsumption	1512.69	0.01	0	0	213.66	0
Peat oxidation	0	0	0	0	0	0
Sinks			0	0		0
Crop sequestration	-85662.03	-0.62	0	0	-2049.61	0
Sequestration in Conservation area	-3154.48	-0.02	0	0	0	0
Total	238016.38	1.72	0	0	-10888.62	0

Summary of Mill Emmision and Creadits

Emissions	tCO2e	tCO2e/tFFB
POME	30276.43	0.18
Fuel Consumption	521.42	0
Grid Electricity Utilisation	0	0
Credits		
Export of Grid Electricity to Housing & Grid	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	30797.85	0.18

POME Treatment

Emissions	%
Divert to compost	0
Divert to anaerobic digestion	100

POME Diverted to Anaerobic Digestion

Emissions	%
Divert to anaerobic pond	100
Divert to methane capture (flaring)	0

Based on the explanation above, the above non-conformity is stated to have been closed

Verified by : **Sofyan Hadi Lubis**

NCR No.	: 2017. 13	Issued by	: Rizliani Aprianita Hasibuan
Date Issued	: 21 April 2017	Time Limit	: 20 June 2017
NC Grade	: Major	Date of Closing	: 9 August 2017

Standard Ref. & Requirement	6.5.1 Documentation of pay and conditions for employees based on the existing manpower regulations shall be available.
Non-Conformance Description & Evidence observed <i>(filled by auditor):</i>	
<p>1. Based on the result of verification of Working Agreement document, it is known that :</p> <ul style="list-style-type: none"> - Incentive are non-permanent income based on work or achievement achieved by workers within a certain period of time regulated in employers' requirements. - Overtime fee is a worker's non-permanent income in which work performed by an employee exceeds normal working hours with reference to prevailing laws and regulations. <p>Based on the document of picket schedule and Overtime (security), it is known that:</p> <ul style="list-style-type: none"> - Overtime is only given on the day of service and on holidays are given an Incentive system (IDR 125,000) <p>The result of incentive documents study (Security) on day off (March 2017), attendance list and interview result of security is known there are security who work in day off. However, the non-permanent income (overtime) provided is not in accordance with the working agreement and Kepmenaker no.102 of 2004 on overtime and overtime fee.</p> <p>2. PT SNP has not been able to show the payment documents of contract worker in Lembiru Estate (NCR 2016 Recurring)</p>	
Root Cause Analysis <i>(filled by organization audited):</i>	
<p>1. CH does not impose work obligation on Sundays and public holidays for the Security, thus assuming that giving Rp.125.000 incentives per entry is a two-way policy that does not incriminate the company or employees.</p> <p>2. The non-communicative of PIC that holders of Payment Documents of Lembiru Estate, payment documents requested by the auditor already exist and are well documented, but not directly submitted when requested by the auditor during the audit process, thus dissolving into findings of nonconformity.</p>	
Corrective Action <i>(filled by organization audited):</i>	
<p>1. Stopping the incentive system amount Rp.125.000, - in conjunction that security not employed over the worktime, proven by Circular Letter by Ka SOU to All Manager of PT SNP.</p> <p>2. Shows the evidence of payment of contract workers; Consist of harvesting, spraying, and maintenance contracts on April 2017.</p>	
Preventive Action <i>(filled by organization audited):</i>	
<p>1. Committed to implement the payroll system in accordance with applicable regulations and set forth in the letter of Joint Commitment signed by All Manager of PT Sandika Natapalma.</p> <p>2. The unit manager elect a more responsive PIC in this case appoint Senior Assistant, to handle the estate file requested by the auditor</p>	
Assessor Evaluation and Conclusion <i>(filled by auditor):</i>	
Observation on 12 June 2017	
<p>The certificate holder has shown evidence of improvement:</p> <p>1. Statement of Commitment of the wage system to all workers in accordance with the guidance set forth in the CLA and the Regulation. The document is signed by each estate manager and Chairman of SOU 13, but there is not enough evidence that the commitment has been recognized and agreed by the Workers' Representative as an element that included in the Collective Labor Agreement.</p> <p>2. Evidence of payment for spraying, maintenance and harvesting workers, but there is not enough evidence that the payment is against all contract workers that employed by PT SNP and not payment by head of the entourage Based on the above matters, this nonconformity is not fulfilled (Open).</p>	
Observation on 16 June 2017	
<p>1. CH showed the recording of job inspection payment on May 2017 for for 5 contract workers (harvesters). There</p>	

is also an explanation of the fulfillment that the wages paid to contract workers are properly paid to each contract worker employed by PT SNP.

2. CH has also show a circular letter on May 15, 2017 no.SE-002/SOU13/V/2017 regarding the arrangement of working hours of the Estate security in PT SNP. The letter mentioned that submitted to all leaders of PT SNP of estate units to provide hours of security maximum of 40 hours in 1 week. (Closed with observation)
all evidence and implementation will be verified through Re-verification Major (Site Visit).

Observation on 18 June 2017

CH has showed a Joint Statement of Commitment between the management of PT Sandika Natapalma and the Workers' Representative on the Wages System in compliance with applicable regulations. The Implementation will be verified at the time of Re verification Major (Site Visit).

Based on the above, the Non-conformance on this indicator has not been fulfilled (Open)

Re-verification Major NCR

9 August 2017

1. Based on the statement from the Head of Administration Section PT Sandika Natapalma that starting as of May 2017 it has been determined that the working time of the week is a maximum of 40 hours and the maximum overtime is 7 hours for 6 working days (Monday, Tuesday, Wednesday and Saturday work For 7 work hours + 1 hour overtime and Friday 5 hours of work + 2 hours overtime based on shift each officer consisting of 3 shifts, ie: Morning at 06.00 - 14.00, noon at 14.00 - 22.00 and Night at 22:00 to 06:00). Based on the results of interviews with 2 security officers it is known that the shift system of work with the 3 time has been ongoing since the first and every officer is only allowed to take a maximum of 2 times work on Sunday in every month. All security officers are currently 12 people (11 Personnel and 1 Team Commander), all have permanent status, interview with 2 officers, it is known that in addition to having social insurances (BPJS), they also get uniform and shoes every year. CH has also showed several examples of recording evidence related to the implementation of the work system, including:

- List Salaries (basic wages, allowances, overtime, rice) for Security Officers on July 2017.
- Attendance List of Security Officers on Tuesday, July 4, 2017.
- Security Incentive Benefit based on attendance in July 2017

2. It has been shown evidence of recording of payment of contract workers at Lembiru Estate, consisting of:

- Cash Voucher - Exit
- Memorial Journal
- Minutes of Job Inspection
- List of Main Revenues of each Contract Worker
- Payment receipts that have been signed by each worker.

Based on the evidences showed above, the nonconformity of this indicator was Closed

Verified by : Oktovianus Rusmin

NCR No.	: 2017. 14	Issued by	: Rizliani Aprianita Hasibuan
Date Issued	: 21 April 2017	Time Limit	: 20 June 2017
NC Grade	: Major	Date of Closing	: 14 June 2017
Standard Ref. &	: 6.13 A policy to respect human rights shall be documented and communicated to all		

Requirement	levels of the workforce and operations
Non-Conformance Description & Evidence observed <i>(filled by auditor):</i>	
Certification Holder have not been able to show evidence of socialization of human rights policy to all levels of workers and operations.	
Root Cause Analysis <i>(filled by organization audited):</i>	
Given the year 2015 has been conducted socialization, and the next implementation will conduct in 2018. So that in 2017 not done socialization.	
Corrective Action <i>(filled by organization audited):</i>	
Disseminating Human Rights Policy for 2017 that implementation in each unit on May 17 to be socialized to all levels of employees.	
Preventive Action <i>(filled by organization audited):</i>	
Implementation of socialization of human rights policy will be done every year at the beginning of every year (once a year) as an effort to refresh the company's policy information about human rights to all employees level	
Assessor Evaluation and Conclusion <i>(filled by auditor):</i>	
Observation on 5 June 2017.	
CH has showed a recording of the socialization of human rights policy to workers in Estate and mill units, including:	
<ul style="list-style-type: none"> • Lembiru Estate: socialization was conducted on May 1, 2017 and attended by 118 workers. • Lembiru Factory: socialization was conducted on May 8, 2017 and was attended by 59 workers • Aawatan Estate: socialization was conducted on May 6, 2017 and attended by 145 participants However, there is not enough evidence that it has been disseminated to third parties, such as contractors and suppliers. Based on this, the discrepancy in this indicator is not fulfilled (Open)	
Observation on 14 June 2017.	
CH has showed evidence in the form of documentation (Minutes, Photos and Attendance List of Participants)	
Socialization of Human Rights Policy by PT SNP to Supplier and Contractor, dated on June 7, 2017.	
Based on evidences, then the Nonconformity on this indicator is declared Closed.	
Verified by	: Oktovianus Rusmin

NCR No.	: 2017.15	Issued by	: Oktovianus Rusmin
Date Issued	: 21 April 2017	Time Limit	: 20 June 2017
NC Grade	: Major (to be Major 8.1)	Date of Closing	: 9 August 2017
Standard Ref. & Requirement	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: <ol style="list-style-type: none"> a. Complete and up to date procedures covering the implementation of all the elements in these requirements; b. 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. 		
Non-Conformance Description & Evidence observed <i>(filled by auditor):</i>			

<ul style="list-style-type: none"> Based document verification and interview of Bulking Kelampai staff was known that there is not yet the procedure was covered the personnel in charge in implementation of SCCS requirement. Based verification of daily report document and interview of related staff in Kelampai Bulking that known the personnel in charge not yet understood the separate mechanism (documentation) of dispatch volume of Certified Product (CPO and PK) and Non Certified Product.
<p>Root Cause Analysis <i>(filled by organization audited)</i>: The CH not yet implemented the specific decision due to all of element was explained in SCCS requirement</p>
<p>Corrective Action <i>(filled by organization audited)</i>:</p> <ul style="list-style-type: none"> Conducting appointment to person in charge of application of SCCS requirement by Chairman SOU to Responsible / Bulking Assistant in Kelampai Bulking Establish the Procedures for applying the SCCS requirements coverage the bulking unit Conducting of socialization to all officers regarding the SCCS requirement in Kelampai Bulking
<p>Preventive Action <i>(filled by organization audited)</i>: Make specific provisions through the Declaration by the SOU Chairman and all Unit Managers on commitment to the implementation of the requirements and compliance with all SCCS requirements in the Bulking Kelampai operating unit attached to the SCCS SOP of SNP</p>
<p>Assessor Evaluation and Conclusion <i>(filled by auditor)</i>:</p> <p>Verification on 12 June 2017 The certificate holder has shown proof of improvement:</p> <ul style="list-style-type: none"> Letter No. IM-003 / SOU13 / SOU13 / V / 2017, dated May 15, 2017, regarding Appointment of Person in charge of SCCS Implementation in Bulking Jetty Kelampai. Product Identification Procedures and Product Traceability at POM of Minamas Plantation (No. Policy: RSPO / 66 / SCCS / 15-SNP, Revision 03, Date May 15, 2017). The procedure has explained and elaborated on the process of receiving raw materials (FFB), production process, Storage/Bulking Station and the process of delivering products to buyers in PT SNP, as well as officers responsible for the implementation of SCCS. Documentation in the form of Minutes, Attendance & Photos of SCCS Training in Bulking Kelampai, June 2, 2017 <p>Based on corrective evidence above, these non conformity was Closed with Observation and will be observed the consistency of implementation at the Major Re-verification (Site Visit)</p> <p>Major NCR Re-verification 9 August 2017</p> <ul style="list-style-type: none"> Personnel in charge in bulking have been able to demonstrate the mechanism of product delivery (CPO and PK) in accordance with existing SOPs and including administrative systems. There have been shows several samples of dispatch documents for CPO and PK products Use of SIME weight to document CPO and PK process acceptance from POM Lembiru, as well as shipment delivery/shipment (dispatch) of CPO and PK products from Bulking Kelampai area to buyers
<p>Verified by : Oktovianus Rusmin</p>

NCR No.	: 2017.16	Issued by	: Team Auditor
Date Issued	: 21 April 2017	Time Limit	: 20 June 2017
NC Grade	: Major	Date of Closing	: 10 August 2017
Standard Ref. & Requirement	: 8.1 Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.		
Non-Conformance Description & Evidence observed <i>(filled by auditor)</i> : Indicator 4.7.3 Health and safety Programme and PPE Using (Closed out on August 10, 2017)			
• HIRAC review and revision of risk control in each work area			

- Provision of appropriate PPE in each work area
- Monitoring the completeness of PPE
- Monitoring the First Aid Kit
- Determination of Monitoring Officer at Estate and POM

Indicator 4.7.5 Implementation of First Aid (Closed out on August 10, 2017)

- Determination of Monitoring Officer at Estate and POM
- Monitoring the First Aid Kit
- Understanding the usefulness of the contents of the First Aid Box to the Monitoring Officers in Estate and POM conducted directly by the company doctors

Indicator 4.7.6 Health and Employment Insurance Programme (Non Permanent Workers) - (Closed out on August 09, 2017)

- All contract workers must complete the terms of employment at the time of initial admission
- Register all workers (including contract workers) in BPJS Membership

Indicator 5.3.2 Waste Management of Chemicals (Closed out on 9 August 2017)

- Socialization to workers and all contractors working with PT Sandika Natapalma on handling of chemical material and Hazardous Waste
- Monitoring existence of chemical material and Hazardous Waste stock (Exit Balance and Entry of Materials)
- Complete the warning and symbols in the chemical material and Hazardous Waste storage

Indicator 6.5.1 The CH has not been able to show payment documents for contract labor (Closed out on August 10, 2017)

- Socialization (explanation) about work shift to the security officers
- Determination of overtime working hours in accordance with the standards set by the company with reference to applicable regulations

SCCS (Module E) E.3.1 (Closed out on August 9, 2017)

- Revision the procedure related to SCCS and due to operations in Plantations, Factories and Bulking
- Socialization or understanding to relevant staff in SCCS implementation from estate to bulking

Root Cause Analysis *(filled by organization audited):*

There was no Internal Audit related to RSPO requirement by responsible staff

Corrective Action *(filled by organization audited):*

The PSQM Team arrange the programme and conduct the Internal Audit related to RSPO implementation requirement and reported to POM Manager and PSQM Manager per 6 month

Preventive Action *(filled by organization audited):*

The PSQM team periodically conducts internal audits to the unit that will conduct the RSPO Audit to review the readiness and compliance of RSPO's compliance and reported to the unit manager and the PSQM manager.

Assessor Evaluation and Conclusion *(filled by auditor):*

Verification on 18 June 2017

The Certificate Holder has submitted the results of the RSPO Standard Internal Audit RSPO Requirements by a competent party made on June 13, 2017. However, there is insufficient evidence that non-compliance with related indicators (4.7.5, 4.7.6 & 6.5.1) has been implemented and some Non-conformance based on Field Findings will be verified at Site Visit Re-verification Major.

**Major NCR Re-verification
9 – 10 August 2017**

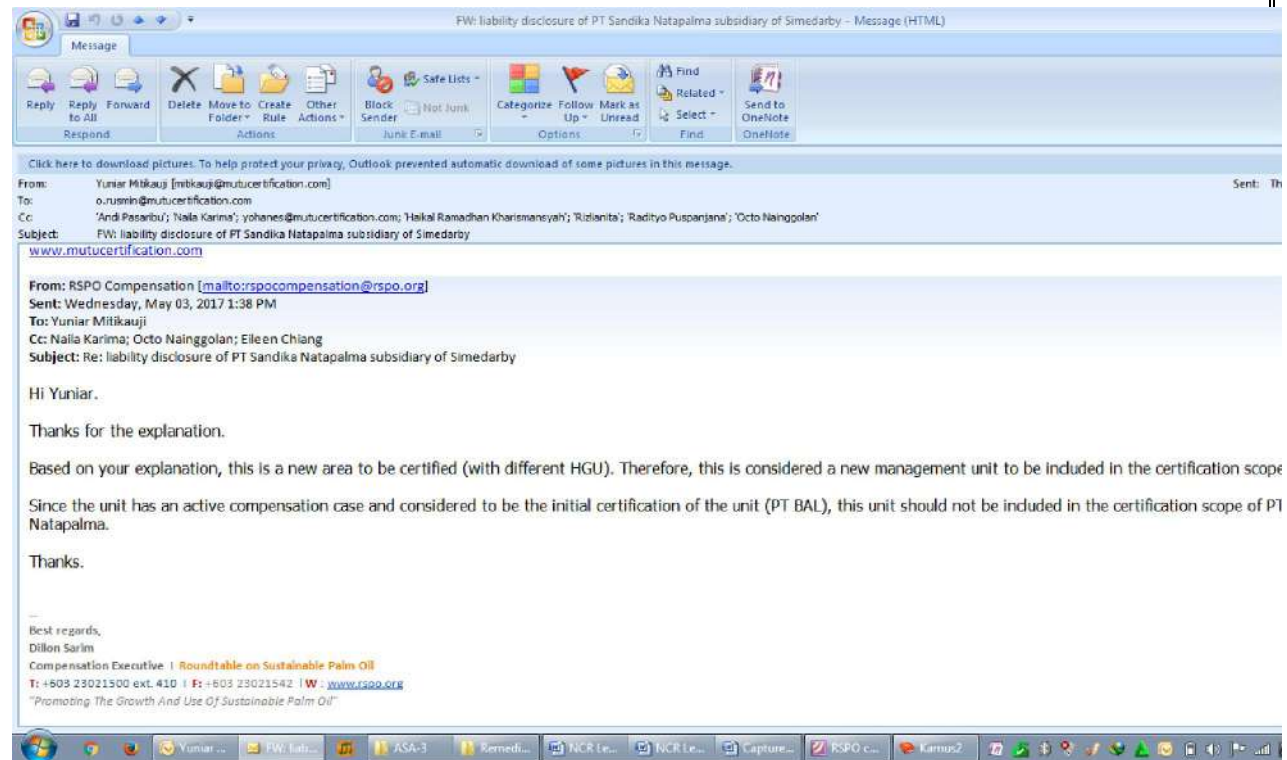
Verification has been done to repeat nonconformities was explained above and based on documentary improvements, interviews to relevant staff and field observations, all Non-conformities have been Closed out. The auditor team will observe the consistency from the implementation of continuous improvement by the Certificate Holder during the next visits in ASA-4

Verified by	: Oktovianus Rusmin
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NCR No.	: 2017.17	Issued by	: Team Auditor
Date Issued	: 21 April 2017	Time Limit	: ASA-4
NC Grade	: Minor	Date of Closing	: 14 May 2018
Standard Ref. & Requirement	: RSPO Cert. System 4.2.4 Time Bound Plan Implementation		

Non-Conformance Description & Evidence observed *(dilengkapi oleh auditor):*

There was inconsistency in the form of delay in the implementation of the Time Bound Plan in the certification process of PT Budidaya Agrolestari because it has not yet finalized the compensation process related to Remediation and Compensation Procedure (RaCP). It is based on information from RSPO Compensation Panel to Certification Body (PT Mutuagung Lestari) on May 3, 2017.



Root Cause Analysis *(filled by organization audited):*

Kurangnya koordinasi oleh Sime Darby Plantation kepada unit operasional Minamas dalam pelaksanaan RSPO Remediation and Compensation Liabilities for Land Clearance without Prior HCV Assessment

Corrective Action *(filled by organization audited):*

Memintakan kembali tanggapan atas submission LUCA yang disampaikan

Preventive Action *(filled by organization audited):*

Mengkoordinasikan lebih lanjut antara Sime Darby Plantation kepada unit operasional Minamas

Assessor Evaluation and Conclusion *(filled by auditor):*

Verification 14 May 2018

Certificate holder has show the time bond plan for certification of PT. Budidaya Agro Lestari in 2018. Units of PT. Budidaya Agro Lestari such as Pelanjau Estate and Plasma Sungai Putih have been processed for stage 2 in May

2018.

Based on this matter, NC has been closed out.

Verified by : Leonada

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

NCR No.	: 2018.01	Issued by	: Sofyan Hadi Lubis
Date Issued	: 22 May 2018	Time Limit	: 21 July 2018
NC Grade	: Major	Date of Closing	: 20 July 2018
Standard Ref. & Requirement	4.6.6 Storage of pesticides shall be according to recognised best practices. All pesticides containers shall be properly managed according to the existing regulations and or instructions enclosed on the containers (see criterion 5.3).		
Non-Conformance Description & Evidence observed (filled by auditor): Based on document review and field visit to Lembiru POM found that the pesticide container had been stored in the licensed hazardous waste storage located in Lembiru POM, and no other uses were found, such as trash cans and flower pots. However, based on field visit in Lembiru housing found pesticides container stored and used in housing areas, for example for water containers. Clarification from the management that the pesticide container was not sourced from Lembiru Estate but from outside the company. In this case the company has not been able to show the mechanism and evidence of control (management control) on the use and storage of pesticide container sourced from the outside.			
Root Cause Analysis (filled by organization audited): For LB3 originating from outside, the company has not made a special appeal or prohibition for its use in residential areas.			
Correction (filled by organization audited): The unit management withdraws all types of hazardous waste in a residential area and is sent to licensed storage, in this case Hazardous Waste of LBF.			
Corrective Action (filled by organization audited): <ul style="list-style-type: none"> - Submit a prohibition on the use of hazardous waste in the housing environment in writing to all residential residents (Memo of each manager of the operational unit) - PSQM Assistant and Division Assistant monitor the hazardous waste packaging once a month in a residential area (SOU Letter No.IM-004 / SOU13 / VI / 2018 and Check Form) 			
Assessor Evaluation and Conclusion (filled by auditor): Auditor Verification, July 20, 2018 The company can show proof of improvement: <ul style="list-style-type: none"> - hazardous waste withdrawal minutes in employee housing environment. Withdrawals made on June 18, 2018 with the type of Used Solar Drums 8 pieces & Pesticide Used Pesticides 25 Fruit. LB3 that has been withdrawn is then sent to TPS LB3 LBF. - Internal Memo Chairman of the SoU to all managers about the prohibition on the use of LB3 in the residential area (Memo No. STKR / 031 / SPO-in.out / VI / 2018 dated 18 June 2018) - Internal Memo Chair of the SoU regarding routine monitoring / checking of the use of LB3 packaging in a residential area (Memo No. IM-004 / SOU / 13/2018) - Memo Manager AWE to employees housing residents about the prohibition on using B3 waste packaging in a residential area (Memo No. STKR / 032 / SPO-in.out / VI / 18 dated 19 June 2018). - Memo Manager LB3 to employees housing residents about the prohibition on using B3 waste packaging in a residential area (Memo No. STKR / 033 / SPO-in.out / VI / 18 dated 19 June 2018). - LBF Memo Manager to employees housing residents about the prohibition on using B3 waste packaging in a residential area (Memo No. STKR / 034 / SPO-in.out / VI / 18 dated 19 June 2018). Based on the explanation above, it was concluded that this non-conformity was declared fulfilled (Closed)			
Verified by	: Sofyan Hadi Lubis		

NCR No.	: 2018.02	Issued by	: Satria Adi Putra
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Date Issued	: 22 May 2018	Time Limit	: 21 July 2018
NC Grade	: Major	Date of Closing	: 21 July 2018
Standard Ref. & Requirement	: 4.7.2 A documented risk assessment shall be available and its implementation shall be recorded.		
Non-Conformance Description & Evidence observed (filled by auditor): The Company already has documentation on hazard risk and risk control (HIRAC) identification, but there are still activities / work on operational areas that have not been identified and analyzed risks such as agrochemical storage, land application and replanting activities.			
Root Cause Analysis (filled by organization audited): The preparation of HIRAC documents has not been based on identification of the types of work that are within the scope of the Marau Unit Operations.			
Correction (filled by organization audited): Identify all types of work that are within the scope of the Marau Operational Unit, and analyze risks to the types of work that do not have HIRAC.			
Corrective Action (filled by organization audited): Identify the type of work every one year to detect new types of work that may not have done risk analysis (identification schedule).			
Assessor Evaluation and Conclusion (filled by auditor): Verification July 21 2018 The company has shown proof of improvement in the form of: <ul style="list-style-type: none"> - Marau Area Work Type HIRAC Identification Document 2018/2019 which was prepared by PT SNP P2K3 dated July 2, 2018 and known by the Chairman of PT SNP P2K3. - Schedule of identification of HIRAC availability for Marau Area type of work containing identification of plans for checking HIRAC that will be carried out every year. - HIRAC Application of Empty Bunches with No HIRARC / SNPBAL / AT dated July 3, 2018 and approved by the chairman of P2K3. The jobstep includes mechanical applications, empty bunches transport and empty bunch manual applications. - HIRAC Land Application with No HIRARC / SNPBAL / LA dated July 3, 2018 and has been approved by the chairman of P2K3. The jobstep includes pump operation, checking and cleaning the pump and opening / closing the application outlet valve. - HIRAC Gudang Kimia with No. HIRARC / SNPBAL / GK dated July 3, 2018 and has been approved by the chairman of P2K3. The jobstep includes receiving, storing, moving goods and storing chemicals. - HIRAC Replanting Work with No HIRARC / SNPBAL / RP dated July 3, 2018 and approved by the chairman of P2K3. The jobstep includes blocking, collapsing, road construction, stacking, making terraces, making horse treads, planting stakes, raising seeds, transporting seeds, making planting holes, fertilizing holes, planting and planting beans. Based on the proof of improvement above, the non-conformity No. 2018.02 stated to have been fulfilled (Closed)			
Verified by	: Satria Adi Putra		

NCR No.	: 2018.03	Issued by	: Satria Adi Putra
Date Issued	: 22 May 2018	Time Limit	: 21 July 2018
NC Grade	: Major	Date of Closing	: 24 August 2018
Standard Ref. & Requirement	: 4.7.3 Records of Safety and Health (OHS) program training (see 4.8) and Personal Protective Equipment (PPE) in accordance with hazard identification and risk		

	analysis should be available to all workers.
Non-Conformance Description & Evidence observed (filled by auditor):	
<p>The Company already has an PPE replacement mechanism. Juklak/03-APD/Marau/V/2016 which regulates the Governance of PPE Replacement. In the procedure explains if the PPE is damaged then replaced by the company. However, based on observations and field interviews to the harvesters in Awatan Estate (3 people) and Lembiru Estate (4 people) it is known that PPE shoes provided by the company have been damaged so that employees make their own purchases. In this case the company has not been able to show proof of replacement of damaged PPE according to the procedures they have.</p>	
Root Cause Analysis (filled by organization audited):	
<p>Identify / check the PPE that is currently used by employees to be investigated and replaced if there is a worker PPE that needs to be replaced.</p>	
Correction (filled by organization audited):	
<p>Identify / check the PPE that is currently used by employees to be investigated and replaced if there is a worker PPE that needs to be replaced.</p>	
Corrective Action (filled by organization audited):	
<p>Re-socialize PPE Replacement Mechanism No. Juklak / 03-APD / Marau / V / 2016 to all workers. Revise the operational guidelines No. Juklak / 02-APD / Marau / V / 2016 to add coverage to check the condition of PPE so that it becomes additional information in ensuring workers work using proper PPE every day.</p>	
Assessor Evaluation and Conclusion (filled by auditor):	
Auditor Verification, July 20, 2018	
<ul style="list-style-type: none"> - Record of socialization related to the mechanism for the replacement of PPE Damaged on July 2, 2018 and known by the Head of SOU 13 Lembiru (Photo documentation attached). - Identification sheet for Lembiru Factory Employee PPE on July 2, 2018, which contains a checklist of PPE conditions and subsequent investigation status. Based on the document, it is known that all PPE at Lembiru Factory is still in good condition so that it does not require replacement (the replacement is still carried out according to the replacement schedule). - Identification sheet of the Awatan Estate Employee PPE condition on July 4, 2018 which contains a checklist of PPE conditions and subsequent investigation status. Based on the document, it was found that based on further investigations there were 5 people whose conditions of Personal Protective Equipment had been damaged and lost. Related to this, on July 5, 2018 the company provided PPE with details of 4 types of boots and 1 type of safety helmet. - Lembiru Estate Employee PPE condition identification sheet on July 3, 2018 which contains a checklist of PPE conditions and subsequent investigation status. Based on the document, it was found that based on further investigation there were 8 people whose conditions of Personal Protective Equipment were damaged. Related to this, on July 4, 2018 the company provided PPE with details of 6 types of boots and 2 types of safety helmets. 	
Auditor Verification, August 4, 2018	
<ul style="list-style-type: none"> - The company shows examples of employee work absences on July 18, 2018 including PPE checks. - The company shows the mechanism for checking PPE No Juklak / 02-APD / Marau / V / 2016 revision July 22 2018 in addition to ensuring workers work using proper PPE every day. <p>Improvement of this incompatibility required a field visit again to ensure the implementation was going well.</p>	
Major Verification, August 24, 2018	
<p>Based on the results of the field visit and the interview with harvester in Block N33/Division II/Awatan Estate(2 Harvesters and 1 FFB Loader) and harvester in Block E4A /Division I/Lembiru Estate (2 Harvesters), it is known that the PPE (shoes) were given by the company in good condition (not damaged and just replaced). Replacement of PPE to workers is done after checking the availability and feasibility of PPE in the field (available PPE inspection forms carried out every day by the supervisor at the time of morning Briefing activities and PPE supervision sheet forms carried out every day by the supervisor when workers work in the field. it can be concluded that the implementation of replacement of damaged PPE (shoes) has been going well (NCR 2018.03 Fulfilled).</p>	

Verified by	: Satria Adi Putra, Leonada & Sofyan Hadi Lubis
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NCR No.	: 2018.04	Issued by	: Steve Mualim
Date Issued	: 22 May 2018	Time Limit	: 21 July 2018
NC Grade	: Major	Date of Closing	: 9 July 2018
Standard Ref. & Requirement	: 4.8.1 Records of training program related to the aspects of RSPO Principles and Criteria shall be available		
Non-Conformance Description & Evidence observed <i>(filled by auditor):</i> PT SNP has training programme for 2018, meanwhile training programme for other related contractor workers for examples FFB transport contractor workers and EFB application contractor workers are not available .			
Root Cause Analysis <i>(filled by organization audited):</i> Identification of employee training as a basis for the preparation of training programs does not cover contract / third-party workers.			
Correction <i>(filled by organization audited):</i> Identify training for contract / third party workers.			
Corrective Action <i>(filled by organization audited):</i> Develop training programs for contract / third party workers based on identification that has been carried out for the next training program period.			
Assessor Evaluation and Conclusion <i>(filled by auditor):</i> Verification July 9, 2018 PT SNP-BAL (excluding Sungai Putih plasma) shows the identification of competencies for third party contract workers, for example related to FFB transport, CPO / PK transport, replanting, and empty bunch application. Meanwhile there is also a training program for the 2018-2019 period which contains programs related to third parties, for example transport management and safety awareness for each related party which is planned to take place since August 2018-June 2019. Based on the information above, non-conformities 2018.04 are declared fulfilled (Observation)			
Verified by	: Steve Mualim		

NCR No.	: 2018.05	Issued by	: Steve Mualim
Date Issued	: 22 May 2018	Time Limit	: 21 July 2018
NC Grade	: Major	Date of Closing	: 21 July 2018
Standard Ref. & Requirement	: 6.1.2 There shall be evidence that the assessment has been conducted with the participation of affected parties.		
Non-Conformance Description & Evidence observed <i>(filled by auditor):</i> Since 2016 -2018 PT SNP has conducted land preparation for replanting activities. Document review shown social impact assessment for current repanting activities are conducted on 2016, but evidence for participaroy way of affected parties in this assessment are not available.			
Root Cause Analysis <i>(filled by organization audited):</i> Social impact assessments due to replanting compiled by independent consultants have not involved the affected parties.			
Correction <i>(filled by organization audited):</i>			

Conduct a review of social impact studies due to replanting prepared by an independent consultant involving the affected parties.	
Corrective Action <i>(filled by organization audited):</i> Schedule a review of social impact studies due to replanting every two years involving the affected parties.	
Assessor Evaluation and Conclusion <i>(filled by auditor):</i> Auditor Verification, 21 July 2018 The company has submitted a review of the results of the social and environmental studies of PT SNP-BAL conducted on June 25, 2018 conducted between the company and the community around the company and a joint statement of the company with the village community towards the implementation of mitigation. Based on the information above, NCR 2018.05 is declared fulfilled by observation.	
Verified by	: Steve Mualim

NCR No.	: 2018.06	Issued by	: Steve Mualim
Date Issued	: 22 May 2018	Time Limit	: ASA4
NC Grade	: Minor	Date of Closing	: 4 August 2018
Standard Ref. & Requirement	: 6.1.4 The documented plan for management and monitoring of social impacts, shall be reviewed at least on two-yearly basis. If necessary, the plan should be updated. There shall be evidence that the review process includes participation of all affected parties.		
Non-Conformance Description & Evidence observed <i>(filled by auditor):</i> Document review shown that company has established social monitoring and management plan for 2016-2017 based on 2016 review. Meanwhile evidence for participatory way of affected parties in this social monitoring/management programme review are not available			
Root Cause Analysis <i>(filled by organization audited):</i> The program of management and monitoring of social impacts that have been compiled in the 2016-2017 period has not been reviewed with the involvement of the affected parties.			
Correction <i>(filled by organization audited):</i> Rearrange the new program in 2018 - 2020 by involving affected parties in accordance with the agreement of the affected parties.			
Corrective Action <i>(filled by organization audited):</i> Schedule the preparation every 2 years by involving the affected parties contained in the joint agreement of the affected party.			
Assessor Evaluation and Conclusion <i>(filled by auditor):</i> Auditor Verification, August 4, 2018 The company shows the following proof of improvement: <ul style="list-style-type: none"> - Review of social and environmental impact assessments June 25, 2018 involving the community shown in the minutes of the minutes, absences and photos of the meeting. - Joint attitude statement dated June 25, 2018 between the community and the company in mitigating social and environmental impacts Based on this, the non-conformity can be stated as fulfilled (Cosed)			
Verified by	: Steve Mualim & Leonada		

NCR No.	: 2018.07	Issued by	: Steve Mualim
Date Issued	: 22 May 2018	Time Limit	: 21 July 2018
NC Grade	: Major	Date of Closing	: 24 August 2018
Standard Ref. & Requirement	: 6.7.1 There shall be documented evidence that minimum age requirements are met.		
Non-Conformance Description & Evidence observed (filled by auditor): Policy related to requirement of worker age can listed on on "Pedoman Manajemen Perkebunan Berkelanjutan" No. Policy 724/TQEM-SPMS/09, on August 2010. Based on Employee List 2018 which described the worker's date of birth, shown there in no underage workers (<18 years) in PT SNP. Field visit and interviews on lembiru estate block F2BC for EFB application activities showed that EFB applicators (contractor workers) are not comply with minimum age requirements. Therefore, companies are not able to shown implementation for mechanism and management control to ascertain all of third party workers/contractors workers are comply with minimum age regulations..			
Root Cause Analysis (filled by organization audited): The company does not have a standard procedure that contains minimum requirements for workers for contractors / contractors / third parties. In the case of an EFB application work, there is no minimum age requirement stated in the work agreement. And in terms of control in the field, supervision is limited to absences before work.			
Correction (filled by organization audited): - Develop a special mechanism related to the procurement / recruitment of third party workers into the SOP - Stop the work agreement of EFB Application (SPK No LBE / SPK-LKL / IV / 2018/003).			
Corrective Action (filled by organization audited): - SOU 13 Chair Memorandum Lembiru regarding affirmation - SOP socialization to all Marau Area operational units - Supervision / foreman supervises during work by filling out the Field Work Monitoring Sheet			
Assessor Evaluation and Conclusion (filled by auditor): Auditor Verification, July 22, 2018 The company has shown some evidence of improvements to these findings including: <ul style="list-style-type: none"> - Memorandum of 30 May 2018 from the chairman of SOU 13 Lembiru to all heads and assistants in the area related to the age requirements of contractor employees. - Dissemination of working age requirements, dissemination of SOPs for contract employee recruitment, and dissemination of the mechanism for checking the completeness of the identity of prospective workers for workers in the business units carried out in the soften estate on 30 May 2018 to the manager, kasie, and assistant marau area - The company has also made new procedures related to contract (excluding staff and SKUs) employees dated May 28, 2018 which explain the age requirements that must be fulfilled by contract employees - Letter of termination of the contract of work No LBE / SPK / -LKL / IV / 2018/003 from the administration of the estate mimic to the empty application contractor Auditor Verification, August 6, 2018 The company again sent improvements in the form of the root of the problem and corrective actions related to the issue of supervision in the field. Besides this, the company also showed several additional improvements, namely: <ul style="list-style-type: none"> - Form of fieldwork supervisory sheet which contains information on the number of workers present during the morning absence, the number of workers working in the field, and the presence of underage workers. - Manager Memorandum dated August 6, 2018 number STKR / 011 / SPO-in-out / VIII / 18 from the Estate Maintenance Manager regarding the manager's instructions to all supervision in the field to check the age of the worker in the fieldwork supervisory form - Manager's Memorandum dated August 6, 2018 number STKR / 012 / SPO-in-out / VIII / 18 from the Lembiru Estate Manager regarding the manager's instructions to all supervision in the field to check the age of the worker in the fieldwork supervisory form 			

- Manager's Memorandum dated August 6, 2018 number STKR / 013 / SPO-in-out / VIII / 18 from the Manager of Lembiru Factory regarding manager's instructions to all supervision in the field to check the age of the worker in the fieldwork supervisory form

In documentation, the company has demonstrated the system and stages for the field control mechanism related to the problem of underage workers. However, the improvement of this incompatibility required a field visit again to ensure the implementation was going well.

Major Verification, August 24, 2018

Based on field visit and interviews with EFB Workers in Block F2CD / Division I / Lembiru Estate (8 workers), it is known that there is no indication of underage workers (18 years). Workers are currently not under the supervision of contractor head but they are already have individual work contracts. In the new contract, there is a minimum age requirement for workers. The auditor has also seen the employee's identity card for EFB application, it is known that there are no underage workers. Based on the evidence, it can be concluded that the NCs is **fulfilled (Closed)**.

Verified by : **Steve Mualim & Leonada**

NCR No.	: 2018.08	Issued by	: Leonada
Date Issued	: 22 May 2018	Time Limit	: 21 July 2018
NC Grade	: Major	Date of Closing	: 4 Agustus 2018
Standard Ref. & Requirement	<p>General COC 5.3.1 & SCCS 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:</p> <ul style="list-style-type: none"> c. Complete and up to date procedures covering the implementation of all the elements in these requirements; d. 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. 		
Non-Conformance Description & Evidence observed (filled by auditor):			
<p>Based on the results of visit in Jetty Kelampai bulking it's found the documents submitted CPO and Kernel to the buyer. However, the bulking can not show evidence of RSPO identity of the MB supply chain model on certified product delivery reports as set out in procedure (RSPO/66/SCCS/15-SNP) for sale of RSPO certified products. As an example of Kernel sales to PT. Married Nabati Indonesia with a transaction on palm trace on 7 September 2017 with the shipping kernel invoice No. 0001/BAP-IKS/BLB/VII/2017 dated 22 July 2017 for total volume of 1,101.15 tons</p>			
Root Cause Analysis (filled by organization audited):			
<p>Claims for the sale of certified products are determined by Marketing Jakarta and there is no communication and information flow from the Jakarta Marketing to the Bulking Jetty Kelampai party regarding certified product sales claims. In kernel sales with kernel delivery news No. 0001 / BAP-IKS / BLB / VII / 2017, Marketing Jakarta does not inform claims of certified products to Bulking Jetty Kelampai.</p>			
Correction (filled by organization audited):			
<p>Complete the kernel delivery news No. 0001 / BAP-IKS / BLB / VII / 2017 with the supply chain MB model RSPO identity in the form of stamp affixing.</p>			
Corrective Action (filled by organization audited):			
<p>Make a written request by SOU Head to Marketing Jakarta to give notification to the Bulking Jetty if there is a claim for the sale of a certified product.</p>			

Regarding the mechanism for delivering information by Marketing Jakarta, Bulking Jetty Kelampai staff then coordinated with Jakarta Marketing Staff. Requested to the marketing staff to be able to fill out and update the Barge Monitoring Arrival & Loading Completion form in each new Delivery Order issuance (both CPO and Kernel).	
Assessor Evaluation and Conclusion <i>(filled by auditor):</i>	
Verification July 20 and August 4 2018	
The company shows an internal letter of memo dated July 2, 2018 to the head of marketing Jakarta regarding the notification of claims for the sale of RSPO certified products.	
The company has also shown the shipping kernel report No. 0001 / BAP-IKS / BLB / VII / 2017 with RSPO identity. Based on this, the non-conformity can be stated as fulfilled.	
Verified by	: Leonada

NCR No.	: 2018.09	Issued by	: Leonada
Date Issued	: 22 May 2018	Time Limit	: 21 July 2018
NC Grade	: Major	Date of Closing	: 20 July 2018
Standard Ref. & Requirement	General COC 5.5.2 Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following: <ol style="list-style-type: none"> The site has legal ownership of all input material to be included in outsourced processes; The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance 		
Non-Conformance Description & Evidence observed <i>(filled by auditor):</i>			
The site has an agreement or contract covering the outsourced process:			
<ul style="list-style-type: none"> - CPO Transporter contractor: CV Trans Pillar Tiga, Agreement on 1 July 2014 to 31 August 2014. - PK Transporter contractor: CV Sumber Sungai Kyai, Agreement on 2 January 2015 available for 6 months. 			
The agreements with CPO and PK transporter contractors have expired and the site can not show the agreement documents to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary			
Root Cause Analysis <i>(filled by organization audited):</i>			
The work agreement previously handled by the Pontianak Office Region, is currently in transition to handling Jakarta Marketing so that all documents are still in the Jakarta Head Office.			
Correction <i>(filled by organization audited):</i>			
Communicate to Marketing Jakarta to obtain a valid cooperation agreement document with CPO and PK transport contractors.			
Corrective Action <i>(filled by organization audited):</i>			
Make a request in writing by SOU to Marketing Jakarta to send documents related to the CPO and PK transport contractor cooperation agreement in every update of the collaboration update.			

Assessor Evaluation and Conclusion *(filled by auditor):*

Auditor Verification, July 20, 2018

The company shows a request for information to the marketing of Jakarta on July 2, 2018.
 The company shows CPO transportation SPK with CV. Trans Pilar Tiga October 1, 2017 is valid from October 1, 2018
 The company shows PK transportation fees with CV. Sumber Sungai Kyai on January 1, 2018 is valid for 12 months.
 The Company also ensures that Certification bodies can access the activities of the contractor if needed through a joint agreement with the contracting parties on May 17, 2018.

Based on this, non-conformities can be stated as fulfilled.

Verified by : **Leonada**

NCR No.	: 2018.10	Issued by	: Leonada
Date Issued	: 22 May 2018	Time Limit	: 21 July 2018
NC Grade	: Major	Date of Closing	: August 31, 2018
Standard Ref. & Requirement	8.1.1 Tersedia rencana aksi pemantauan yang berdasarkan pertimbangan analisis dampak lingkungan dan sosial, dan evaluasi rutin untuk kegiatan perkebunan dan pabrik kelapa sawit. Minimum hal ini harus termasuk, namun tidak terbatas pada: <ul style="list-style-type: none"> • Pengurangan penggunaan bahan-bahan kimia tertentu (Kriteria 4.6). • Dampak lingkungan (Kriteria 4.3, 5.1 dan 5.2). • Pengurangan limbah (Kriteria 5.3). • Polusi dan emisi GRK (Kriteria 5.6 dan 7.8). • Dampak sosial (kriteria 6.1). • Pengoptimalan hasil panen TBS (criteria 4.2). 		
Non-Conformance Description & Evidence observed <i>(filled by auditor):</i>			
Based on the results of the audit at ASA-4 found recurring non-conformities from the previous ASA. In this regard, the company has not been able to show evidence of implementing RSPO systems and standards that are consistent, monitored and evaluated. Repeated nonconformities are: <ul style="list-style-type: none"> - SCCS E.3.1 - 4.7.3 Major - 4.8.1 Major 			
Root Cause Analysis <i>(filled by organization audited):</i>			
There is no structured organization at the operational unit level that ensures the implementation of the RSPO system and standards consistently, monitored and evaluated.			
Correction <i>(filled by organization audited):</i>			
Develop a structured organization that ensures the implementation of RSPO systems and standards consistently, monitored and evaluated.			
Corrective Action <i>(filled by organization audited):</i>			
Formulate the scope of responsibility for operational unit personnel in the implementation of the RSPO system and standards.			
Assessor Evaluation and Conclusion <i>(filled by auditor):</i>			
Auditor Verification, July 22, 2018			
The company shows the establishment of the RSPO Committee structure with the formulation of its responsibility scope including monitoring and evaluation. However, the company has not been able to show proof of evaluation of the emergence of repeated major nonconformities and the implementation of RSPO standards and systems. Based on			

this, the non-conformity is declared as not yet fulfilled.

SCCS E.3.1

The company has shown Root Cause Analysis, Correction, Corrective Action.

Regarding proof of repairs sent by the company, the auditor verifies on July 20 and August 4, 2018. The verification results are as follows:

- The company shows the Internal Memo Letter dated July 2, 2018 to the head of marketing Jakarta regarding notification of claims for the sale of RSPO certified products.
- The company has also shown the shipping kernel report No. 0001 / BAP-IKS / BLB / VII / 2017 with RSPO identity.

Based on this, the non-conformity can be stated as fulfilled.

4.7.3 Major

The company has shown Root Cause Analysis, Correction, Corrective Action.

Regarding proof of repairs sent by the company, the auditor verifies on July 20, 2018. The verification results are as follows:

- Record of socialization related to the mechanism for the replacement of PPE Damaged on July 2, 2018 and known by the Head of SOU 13 Lembiru (Photo documentation attached).
- Identification sheet for Lembiru Factory Employee PPE on July 2, 2018, which contains a checklist of PPE conditions and subsequent investigation status. Based on the document, it is known that all PPE at Lembiru Factory is still in good condition so that it does not require replacement (the replacement is still carried out according to the replacement schedule).
- Identification sheet of the Awatan Estate Employee PPE condition on July 4, 2018 which contains a checklist of PPE conditions and subsequent investigation status. Based on the document, it was found that based on further investigations there were 5 people whose conditions of Personal Protective Equipment had been damaged and lost. Related to this, on July 5, 2018 the company provided PPE with details of 4 types of boots and 1 type of safety helmet.
- Lembiru Estate Employee PPE condition identification sheet on July 3, 2018 which contains a checklist of PPE conditions and subsequent investigation status. Based on the document, it was found that based on further investigation there were 8 people whose conditions of Personal Protective Equipment were damaged. Related to this, on July 4, 2018 the company provided PPE with details of 6 types of boots and 2 types of safety helmets.

Auditor Verification, August 4, 2018

- The company shows examples of employee absences on July 18, 2018 including PPE checks.
- The company shows the mechanism for PPE checking No Juklak / 02-APD / Marau / V / 2016 revision July 22 2018 in addition to ensuring workers work using proper PPE every day.

Improvement of this incompatibility required a field visit again to ensure the implementation was going well.

Major Verification, August 24, 2018

Based on the results of the field visit and the interview with Harvest Workers in the Block N33/Division II/Awatan Estate (2 Harvesters and 1 FFB Loader) and harvester in Block E4A /Division I/Lembiru Estate (2 Harvesters), it is known that the PPE (shoes) were given by the company in good condition (not damaged and just replaced). Replacement of PPE to workers is done after checking the availability and feasibility of PPE in the field (available PPE inspection forms carried out every day by supervisor at the time of morning briefing activities and PPE supervision sheet forms carried out every day by supervisor when workers work in the field. it can be concluded that the implementation of replacement of PPE damaged (shoes) has been going well (NCR 2018.03 Fulfilled).

4.8.1 Major

The company has shown Root Cause Analysis, Correction, Corrective Action.

Regarding proof of repairs sent by the company, the auditor verifies on July 9, 2018. The verification results are as follows:

- PT SNP-BAL (excluding Plasma Sungai Putih) shows the identification of competencies for third party contract

workers, for example related to FFB transport, CPO / PK transport, replanting, and empty bunch application. Meanwhile there is also a training program for the 2018-2019 period which contains programs related to third parties, for example transport management and safety awareness for each related party which is planned to take place since August 2018-June 2019.

Based on the information above, non-conformities 2018.04 are declared fulfilled (Observation)

Major Verification, August 24, 2018

The company has presented an evaluation document on the fulfillment of a repeat NCs major. The evaluation document contains the evidence of the Root Cause Analysis, Correction, Corrective Action, Personal In Charge, and the time to improvement NC. From the document it is known that all repeated NCs have been fulfilled (NCR 2018.10 Fulfilled)

Major panel verification in order to leave suspend, 29 August 2018.

Panelist response: How does the company ensure that the NCs that ever existed does not recurred in the future?, for example by arrange a special internal audit program conducted by competent officers.

An internal audit is specifically carried out on the NCs that has existed, so it does not reoccur.

The special internal audit program can be added into the document "**rumusan ruang lingkup tanggungjawab personil unit operasional dalam implemtasi sistem dan standart RSPO**". Who is the officer, what are the responsibilities, and the period of implementation.

Auditor verification, August 31, 2018

To ensure that the NCs that has ever existed is not repeated in the future, the company has made a special internal audit program conducted once a year in January. Special internal audit is carried out by competent officers (passed RSPO Internal Audit based training on ISO 19011: 2002 with certificate No. 901 / R-BHC / I / 2011). In addition, the company will also conduct an evaluation of NCs in the previous period, then mapping the preventive measures so it will not be repeated. Based on the evidence, it can be concluded that the NCs is **fulfilled (Closed)**.

Verified by	:	Leonada + Sofyan Hadi Lubis
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3.5.2 Opportunity for Improvement

No	Std. Ref.	Penjelasan
1	2.1.1	Some operators of transporting and forklift are not being trained yet and the company has the program to provide it.
2	2.2.3	The companies effort to negotiate and compensate in those areas are became opportunity for improvement
3	5.2.3	Opportunity to add several components in the monitoring of RTE species such as: check who is found capture, harm, collect or kill of RTE species.
4	General COC 5.3.2	Audit internal SCCS
5	General COC 5.13.1	Management review SCCS
6	SCCS E.3.2	Pelanjau Estate (PT. BAL) and Plasma Sungai Putih are currently in the process of certification. The site has an opportunity for improvement to the separation mechanism between FFB certified (HGU) and FFB non-certificate (non HGU) of Pelanjau Estate after being certified.
	TBP	Certification for units planned in 2018

3.5.3 Noteworthy Positive Components







No	Ref Std	Descriptions
1	-	The company's commitment to implementation the principles of sustainable palm oil plantation management
2	-	Competent human resources
3	-	Implementation of integrated pest management
4	-	Proper Biru period of 2016 – 2017

3.6 Summary of Arising Issues from Public, Management and Auditor Response

Public Issues (Institution/ NGO/Community)	Auditor Responses
<p>Land Agency of District Ketapang</p> <ul style="list-style-type: none"> - The communications between company and the agency are going well. - The company has HGU for 1002,79 Ha. - The company has comply to all regulation related to land regulations. - There is no issues regarding to land dispute. 	<p>This matter has been verified at criterion 2.1 and 2.2</p>
<p>Manpower Agency</p> <ul style="list-style-type: none"> • Compulsory report have been submitted for regular basis • Company has implemented local workers utilization for operational activities • There is no issues regarding under age workers • Workers wages has been paid based on minimum wage standard and all workers have been registered of labor social insurance and labor health insurance. • There is no issues related industrial disputes between company and workers 	<ul style="list-style-type: none"> • All compulsory report by company has been verified by auditor team as written on indicator 1.1.1. • The company has implemented minimum wage refer to the latest regulation as written in 6.5.1.
<p>Environment Agency of Ketapang District (Head of P2LH)</p> <p>The company has environment document, has permit to utilize POME on the land (land application), environment management and monitoring results are regularly reported to environment agency. Until now there are no reports or negative issue related to pollution in the company area.</p>	<p>There are no negative issues related to environmental management and monitoring. The company has environment document, has permit to utilize POME on the land (land application), environment management and monitoring results are regularly reported to environment agency. Until now there are no reports or negative issue related to pollution in the company area. This has been described in indicator of 5.1.1; 5.1.2; 5.1.3; 4.4.3, etc.</p>
<p>Plantations Agency of Ketapang District</p> <ul style="list-style-type: none"> • The company already has the documents of land rights in the form of concession and permits for business activities • The company has reported its business activities to the palntation agency routinely. • There are no negative issues such as fires. • The company does not have new location permits. • There is no environmental issues related to company's operational. • The company has adequate facilities and infrastructure of fire and functioning properly. • The Company has given assistance through its CSR program and partnered with local communities. 	<ul style="list-style-type: none"> • The company has had all plantation permit and has been complied all obligation reports. It refer to indicator 1.1.1. • According to field observation, there are no environment pollution from estate and mill operational.
<p>Public Figure & Head of Dusun Awatan, Sukakarya Village (Ujang Gantang & Sumanto)</p>	

Public Issues (Institution/ NGO/Community)	Auditor Responses
<ul style="list-style-type: none"> Realization for 2018 CD/CSR are done based on stakeholder meeting on 2017 Company have participated with local community development for examples by using local workers General community perception against company are good The company has considered satisfactory cooperative and transparent in providing information, for example towards job vacancies. FFB price, CSR and grants. Village people has recognize company representative (PIC) from Division of Public Relation (PR) which handled this matters. 	<ul style="list-style-type: none"> Interview with surrounding village representative that known there was no land dispute or environmental issues as written criterion 2.3; 5.1, 6.1 and 6.4. Has had CSR program and implementation. It refer to criterion 6.11.
<p>Public Figure & Head of Dusun Sedawak, Karya Baru Village (Sutikno & Juntin)</p> <ul style="list-style-type: none"> Land acquisition process on karya palma estate are constrained in compensation dealing Realization for 2018 CD/CSR are done based on stakeholder meeting on 2017 Local workers acceptance are very low The company has cooperation with local contractors from surrounding villages 	<ul style="list-style-type: none"> Until now karya palma estate are not included for RSPO audit In accordance with criteria 6.11 Document review shown that local workers acceptance are more than 30% from total workers
<p>Head of Dewan Adat Dayak and Head of Mitra Usaha Tani Sejahtera cooperation (Plasma Sungai Putih), Pelanjau Jaya village (Ayal Wiranata)</p> <ul style="list-style-type: none"> General community perception against company are good Sungai putih plasma has been managed with profesional manner CD/CSR was done periodically based on community needs for example road maintenance There is no environmental pollution issue and land fire during 2017-2018 HCV socialization has been conducted by company on 2017 Company are expected to involved cooperation committee in budget drafting 	<ul style="list-style-type: none"> In accordance with criteria 5.1, 5.2, and 5.3 CSR programme are in accordance with criterion 6.11. Because plasma sungai putih are full managed scheme smallholders, therefore until now budget drafting and preparation are engaged with PT BAL.
<p>Gender Committee</p> <ul style="list-style-type: none"> Menstruation rights and maternity leave rights may be made in accordance with the results of a doctor / nurse examination. These rights are contained in the company's policies and regulations. There is no negative issues such as discrimination and sexual abuse or child labor. There is no discrimination for women workers, for examples 	<p>This is further explained in criteria 6.8 & 6.9</p>

Public Issues (Institution/ NGO/Community)	Auditor Responses
there is woman spraying foreman in company	
<p>Replanting local contractor, FFB and CPO transportation, (PT Ratama berlian, CV Hikmah, and PT Trans pilar Tiga)</p> <ul style="list-style-type: none"> • Companies had socialized policies such as corporate codes of conduct and the use of labor over 18 years. • The entire execution of the work and payment in accordance with the applicable agreement. • Mechanism for complaint and grievance has been socialized by company 	<p>Based on document verification, show that the rights and obligation of each party has been set in the contract.</p> <p>The company shown commitment for empowering local contractors. For further explanation see indicator 6.10</p>

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>Signed on behalf of:</p> <table data-bbox="367 761 1324 1164"><tr><td data-bbox="367 761 766 1164"><p>PT. Sandika Natapalma Head of PSQM Minamas Plantation, Sime Darby Plantation Bhd</p><p><u>Mohammad Pirabaharan</u> 31 August 2018</p></td><td data-bbox="766 761 1324 1164"><p>PT Mutuagung Lestari Lead Auditor</p><p><u>Leonada</u> 31 August 2018</p></td></tr></table>	<p>PT. Sandika Natapalma Head of PSQM Minamas Plantation, Sime Darby Plantation Bhd</p>  <p><u>Mohammad Pirabaharan</u> 31 August 2018</p>	<p>PT Mutuagung Lestari Lead Auditor</p>  <p><u>Leonada</u> 31 August 2018</p>
<p>PT. Sandika Natapalma Head of PSQM Minamas Plantation, Sime Darby Plantation Bhd</p>  <p><u>Mohammad Pirabaharan</u> 31 August 2018</p>	<p>PT Mutuagung Lestari Lead Auditor</p>  <p><u>Leonada</u> 31 August 2018</p>		

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	Land Agency of District Ketapang	Ketapang District, West Kalimantan Province	-	Interview	15 th May 2018	√	
2	Manpower Agency	Ketapang District, West Kalimantan Province	-	Interview	15 th May 2018	√	
3	Environment Agency	Ketapang District, West Kalimantan Province	-	Interview	15 th May 2018	√	
4	Plantations Agency	Ketapang District, West Kalimantan Province	-	Interview	15 th May 2018	√	
5	Public Figure & Head of Dusun Awatan, Sukakarya Village (Ujang Gantang & Sumanto)	Ketapang District, West Kalimantan Province	-	Interview	15 th May 2018	√	
6	Public Figure & Head of Dusun Sedawak, Karya Baru Village (Sutikno & Juntin)	Ketapang District, West Kalimantan Province	-	Interview	16 th May 2018	√	
7	Head of Dewan Adat Dayak & Head of Mitra Usaha Tani Sejahtera cooperation (Plasma Sungai Putih), Pelanjau Jaya village (Ayal Wiranata)	Ketapang District, West Kalimantan Province	-	Interview	16 th May 2018	√	
8	Gender Committee	Ketapang District, West Kalimantan Province	-	Interview	16 th May 2018	√	
9	Local Contractor of Replanting, FFB and CPO transportation (PT Ratama Berlian, CV Hikmah, and PT Trans Pilar Tiga)	Ketapang District, West Kalimantan Province	-	Interview	16 th May 2018	√	
10	Internal stakeholder <u>Lembiru Estate</u> - 8 peoples (spraying and	Ketapang District, West Kalimantan Province	-	Interview	During an audit	√	

<p>manuring worker)</p> <ul style="list-style-type: none"> - 4 peoples (harvester and loss fruit picker) - 2 peoples (EFB applicator) - 1 people (Land Application) - 1 people (IPM Operator) <p><u>Lembiru POM</u></p> <ul style="list-style-type: none"> - 2 peoples (Security of Lembiru POM) - 3 peoples (grading operator) - 4 peoples (sterilizer operator) - 1 people (kernel station operator) - 1 people (engine room operator) - 3 peoples (boiler operator) 					
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Appendix 2. Assessment Program

DATE		14 to 17 May 2018	
PLANNED TIME	ACTUAL DURATION	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 14 May 2018			
05.30 – 09.30	05.30 – 09.30	JAKARTA → Ketapang	• All Auditor
10.00 – 14.00	10.00 – 14.00	Stakeholders consultation to related agencies in Ketapang Regency	• All Auditor
08.00 – 10.00	08.00 – 10.00	Ketapang → PT Sandika Natapalma	• All Auditor
Tuesday, 15 May 2018			
08.00 – 09.00	08.00 – 09.00	Opening meeting <ul style="list-style-type: none"> Auditee Speech (Introduction of PIC, Profile of Certified Management Unit) Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification) 	• All Auditor
09.00 – 12.00	09.00 – 12.00	Stakeholder Consultation <ul style="list-style-type: none"> Interview with Gender Committee, Worker's Union, Worker's Cooperative (if any), Local Contractor (for Mill and Estate), Third Party Supplier Stakeholder consultation to affected communities surrounding the plantations. 	• SAP • STM
09.00 – 12.00	09.00 – 12.00	Field observation to Lembiru Palm Oil Mill: <ul style="list-style-type: none"> Supply Chain verification (FFB Receiving, Weighbridge, FFB Sorting, Processing Activity, Despatch CPO) Occupational Health & Safety Aspect (Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, POME Pond) and implementation of Employment Procedure and Mechanism Aspect 	• LEO • STM • STM
12.00 – 14.00	12.00 – 14.00	Break	
14.00 – 17.00	14.00 – 17.00	Documents Review <ul style="list-style-type: none"> Review of previous (Initial assessment) findings Verification of Basic Information Mill and Estate Confirmation of Time Bound Plan Review of Partial Certification 	• All Auditor
Wednesday, 16 May 2018			

DATE		14 to 17 May 2018	
PLANNED TIME	ACTUAL DURATION	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
08.00 – 12.00	08.00 – 12.00	Field Observation to Awatan Estate Aspect to be verified : <ul style="list-style-type: none"> • Implementation of Legal Aspect (Land Ownership, Legal Boundaries); • Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) • Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) • Implementation of Occupational Health & Safety Aspect • Implementation of Employment Procedure and Mechanism Aspect • Observation of Workers Facilities (Housing, School, Worship Place). 	<ul style="list-style-type: none"> • LEO • SAP • SHL • STM • SAP • SHL
12.00 – 14.00	12.00 – 14.00	Break	
14.00 – 17.00	14.00 – 17.00	<ul style="list-style-type: none"> • Verification of stakeholder consultation result and field visit. • Document review and completing audit checklist. 	All Auditor
Thursday, 17 May 2018			
08.00 – 12.00	08.00 – 12.00	Field Observation to Lembiru Estate Aspect to be verified : <ul style="list-style-type: none"> • Implementation of Legal Aspect (Land Ownership, Legal Boundaries); • Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) • Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) • Implementation of Occupational Health & Safety Aspect • Implementation of Employment Procedure and Mechanism Aspect • Observation of Workers Facilities (Housing, School, Worship Place). 	<ul style="list-style-type: none"> • LEO • SAP • SHL • STM • SAP • SHL
12.00 – 14.00	12.00 – 14.00	Break	
14.00 – 17.00	14.00 – 17.00	<ul style="list-style-type: none"> • Verification of stakeholder consultation result and field visit. • Document review and completing audit checklist. 	All Auditor

DATE		14 to 17 May 2018	
PLANNED TIME	ACTUAL DURATION	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
15.00 – 16.30	15.00 – 16.30	Closing Meeting: <ul style="list-style-type: none"> • Penyampaian hasil audit (Catatan Komponen Positif, Ketidaksesuaian, OFI, Batas Waktu Perbaikan dan Kesimpulan) // Presentation of audit findings (Noteworthy Positive Component, Non Conformities, OFI, Timelie of CAR's, Conclusion)/ • Komentar, Tanggapan dan Diskusi // Comments, Responses and Questions 	All Auditor
16.30 – 21.30	16.30 – 21.30	PT SNP → Ketapang	