

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

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

Name of Management Organisation : Manggala Palm Oil Mill – PT Tunggal Mitra Plantation subsidiary of SIME DARBY Plantation Sdn Bhd

Plantation Name : Manggala 1 Estate, Manggala 2 Estate dan Manggala 3 Estate

Location : Village of Pujud, Sub District of Pujud, District of Rokan Hilir, Province of Riau, Indonesia

Certificate Code : **MUTU-RSPO/002**

Date of Certificate Issue : 25 November 2015 **Date of License Issue :** 25 November 2015

Date of Certificate Expiry : 24 November 2020 **Date of License Expiry :** 24 November 2016

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
RC	31 August 2015 – 04 September 2015	Oktovianus Rusmin (Lead Auditor), Naila Karima, Sapto Hadi Winarno, Radytio Puspanjana	Taufik Margani	Tony Arifiarachman

Assessment	Approved by MUTUAGUNG LESTARI on:
RC	20 November 2015

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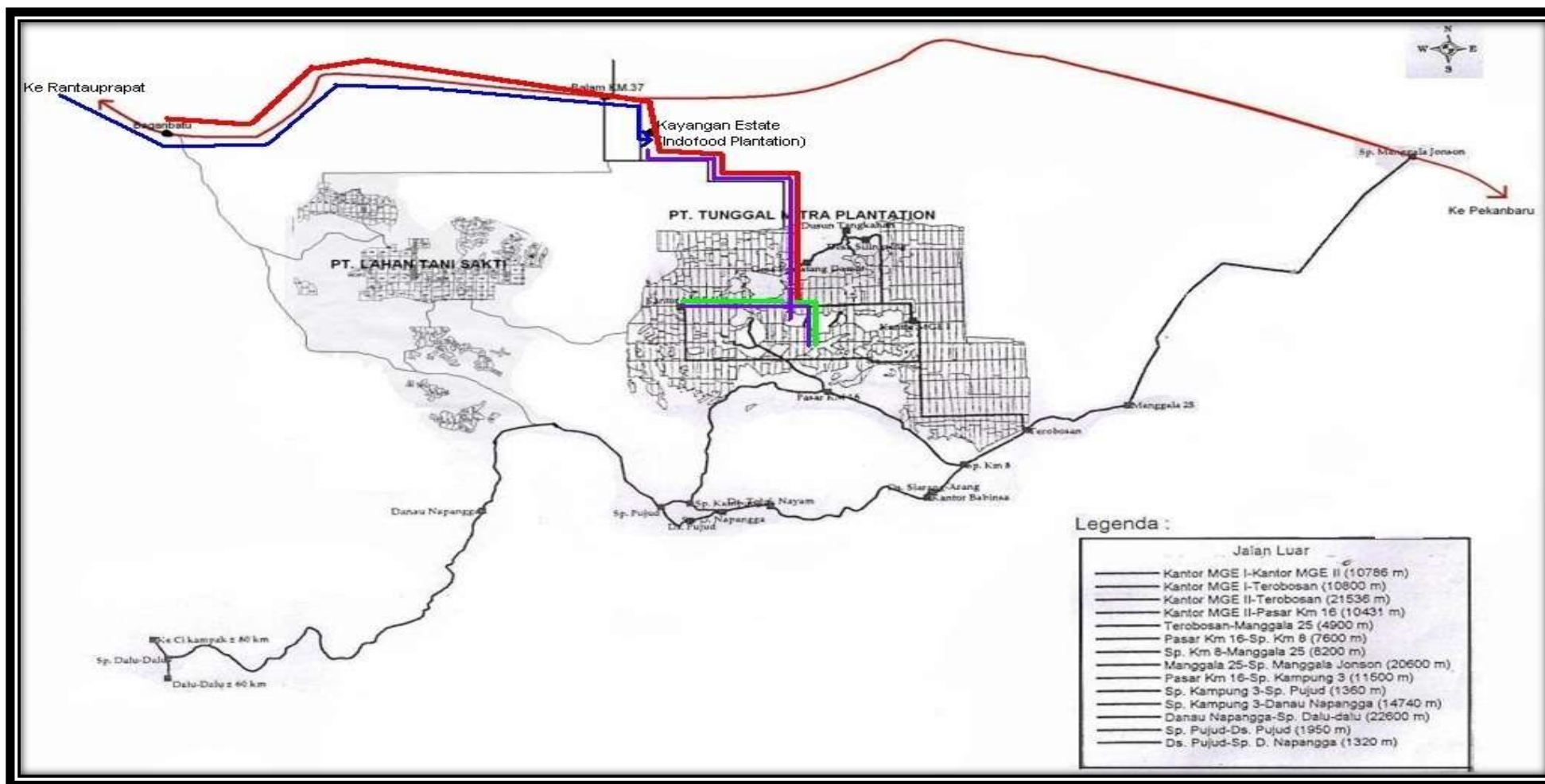
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Figure 1. Location Map of PT Tunggal Mitra Plantation



Figure 2. Operational Map of PT Tunggul Mitra Plantation



Abbreviations Used		
B3	:	Bahan berbahaya dan beracun (Hazardous Waste)
BLH	:	Badan Lingkungan Hidup (Environment Agency)
BOD	:	Biological Oxygen Demand
BPJN	:	Badan Pertanahan Nasional (Land Agency)
BPJS	:	Badan Penyelenggara Jaminan Sosial (Manpower Social Insurance)
BSS	:	Block Spraying System
CD	:	Community Development
CPO	:	Crude Palm Oil
CSR	:	Cooperate Social Responsibility
FFB	:	Fresh Fruit Bunch
GAPKI	:	Gabungan Pengusaha Kelapa Sawit Indonesia (Indonesian Palm Oil Association)
GPS	:	Global Positioning System
HCV	:	High Conservation Value
HGU	:	Hak Guna Usaha (Land Use Title)
HIRARC	:	Hazard Identification Risk Assessment and Risk Control
MGE 1	:	Manggala Estate 1
MGE 2	:	Manggala Estate 2
MGE 3	:	Manggala Estate 3
MGF	:	Manggala Factory
MPA	:	Masyarakat Peduli Api (community groups concerned with fire)
MSDS	:	Material Safety Data Sheet
MRC	:	Minamas Research Centre
OER	:	Oil Extraction Rate
P2K3	:	Panitia Pembina Keselamatan dan Kesehatan Kerja (OHS Committee)
PK	:	Palm Kernel
PKB	:	Perjanjian Kerja Bersama (Collective Labor Agreement)
PPE	:	Personal Protective Equipment
PUK-SPSI	:	Pengurus Unit Kerja – Serikat Pekerja Seluruh Indonesia (Unit Head of Worker Union)
RC	:	Re-Certification
RKL	:	Rencana kelola lingkungan (Environment Management Plan)
RPL	:	Rencana pemantauan lingkungan (Environment Monitoring Plan)
RSPO	:	Roundtable on Sustainable Palm Oil
SOP	:	Standart Operating System
SPSI	:	Serikat Pekerja Seluruh Indonesia (Worker Union)
SPUP	:	Surat Pendaftaran Usaha Perkebunan (Plantation Bussines Permit)
TMP	:	PT Tunggal Mitra Plantation
UMP	:	Upah Minimum Provinsi (Province Minimum Wage)
WWTP	:	Waste Water Treatment Plant

1.0	SCOPE of the CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used	<ul style="list-style-type: none"> • <i>RSPO Principles and Criteria (P&C) for for the Production of Sustainable Palm Oil - April 25th, 2013.</i> • <i>RSPO Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014 (Module D / E for CPO Mill)</i> 	
1.2	Organisation Information		
1.2.1	Organisation name listed in the certificate	PT Tunggal Mitra Plantation subsidiary of SIME DARBY Plantation Sdn Bhd	
1.2.2	Contact person	Mohamad Pirabaharan	
1.2.3	Organisation address and site address	<ul style="list-style-type: none"> • SIME DARBY Plantation Sdn Bhd No 2, Plantation Tower Jalan PJU 1A/7 Petaling Jaya, Malaysia 47301 • The Plaza Office Tower, 36th Floor. Jl. MH 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@sime-darby.com	
1.2.7	Web page address	www.sime-darby.com	
1.2.8	Management Representative who completed the application for certification	Mohamad Pirabaharan	
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	Manggala Mill and 3 Estate, It's consists of Manggala 1 Estate, Manggala 2 Estate and Manggala 3 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
	Manggala Mill	Village of Pujud, Sub District of Pujud, District of Rokan Hilir, Province of Riau, Indonesia.	N 1° 31' 16" E 100° 43' 40"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			Latitude Longitude
	Manggala 1 Estate	Village of Pujud, Sub District of Pujud, District of Rokan Hilir, Province of Riau, Indonesia.	N 1° 32' 7" E 100° 43' 48"
	Manggala 2 Estate	Village of Pujud, Sub District of Pujud, District of Rokan Hilir, Province of Riau, Indonesia.	N 1° 31' 54" E 100° 38' 38"

	Manggala 3 Estate	Village of Pujud, Sub District of Pujud, District of Rokan Hilir, Province of Riau, Indonesia.	N 1° 28' 23"	E 100° 45' 32"
1.5	Description of Area Statement			
1.5.1	Tenure			
	• State		13,836.00	Ha
	• Community		-	Ha
1.5.2	Area Statement			
	• Total area		13,836.00	Ha
	• Mature area		8,093.04	Ha
	• Immature area		2,348.21	Ha
	• Mill		15.26	Ha
	• Infrastructure		492.32	Ha
	• Replanting		369.62	Ha
	• Nursery		29.23	Ha
	• Occupation		2,472.40	Ha
	• HCV		14.32	Ha
	• Others area		1.60	Ha
1.6	Planting Year and Cycles			
1.6.1	Age profile of planting year			
	Planting Year	Hectarage (Ha)		
		Manggala 1 Estate	Manggala 2 Estate	Manggala 3 Estate
				Total
	1989			87.90
	1990	393.70		521.78
	1991	80.16	59.70	476.86
	1992	1,581.68	967.20	208.14
	1993	116.48	83.40	495.63
	1994	60.56	388.10	101.00
	1996		61.60	
	1997		220.30	119.58
	1998	35.43	394.00	46.96
	1999		441.30	
	2000		372.20	96.93
	2004		56.80	
	2006		50.18	
	2013	223.45		671.93
	2014	395.43	246.10	331.8
	2015	428.85	270.10	355.99
	TOTAL	3,315.75	3,610.98	3,514.52
				10,441.25

1.6.2	New Planting area after January 2010			-	Ha		
1.6.3	Planting Cycle			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 (%)
	Manggala POM	60	173,374.28	39,452.74	22.76	8,376.61	4.83
	<i>*Production data source from September 2014 to August 2015</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)	%
	Manggala 1	4,919.67	3,315.75	56,205.53	22.56	56,205.53	100
	Manggala 2	4,921.65	3,610.98	67,789.23	21.90	67,789.23	100
	Manggala 3	3,994.68	3,514.52	49,379.52	19.70	49,379.52	100
TOTAL	13,836.00	10,441.25	172,374.28	21.42	172,374.28	100	
	<i>*Production data source from September 2014 to August 2015</i>						
1.7.3	FFB description from other source						
	Name of sources	Organisation	Location	Supplied to Mill			
				FFB (tonnes/year)			
	-						
	-						
	TOTAL						
	<i>*PT TMP doesn't receive FFB from outside crops (smallholders or other independent)</i>						
1.7.4	Product categories			FFB, CPO, PK			
1.8	Estimate Tonnage of Certified Product						
1.8.1	Past Annual Claim Certified Product			Previous Certificate Claim 25 November 2014 to 24 November 2015 (tonnes/year)		Actual certified product 25 November 2014 to 31 August 2015 (tonnes/year)	
	• FFB Production			179,393.40		133,582.50	
	• CPO Production			42,157.45		31,442.99	
	• Palm Kernel (PK) Production			8,969.67		6,351.22	
1.8.2	Estimate of Certified FFB Claim						
	Name of Estate(s)	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)		
	Manggala 1	4,919.67	3,315.75	51,906.00	20.83		
	Manggala 2	4,921.65	3,610.98	61,621.00	19.91		
	Manggala 3	3,994.68	3,514.52	47,757.00	19.05		
	TOTAL	13,836.00	10,441.25	161,284.00	19.93		

	<i>*Projected CSPO and CSPK production period 25 November 2015 to 24 November 2016</i>						
1.8.3	Estimate of Certified Palm Product Claim						
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel	
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)
	Manggala POM	60	161,284	38,305	23.75	8,064	5.00
	<i>*Projected CSPO and CSPK production period 25 November 2015 to 24 November 2016</i>						
1.9	Other Certifications						
	ISO 9001:2008			-			
	ISO 14001: 2004			-			
	OHSAS 18001:2007			-			
	ISCC			-			
	Others						
1.10	Time Bound Plan						
1.10.1	Time Bound Plan for Other Management Units						
MANAGEMENT UNIT		Estate (Supply Base)	Time Bound	LOCATION			
P O M	Time Bound						
Sekunzir. PT. Indotruba Tengah	Certified 2010	Sekunzir	Certified 2010	Seruyan and West Kotawaringin District – Central Kalimantan			
		Seruyan	Certified 2010				
Manggala. PT. Tunggal Mitra Plantations	Certified 2010	Manggala 1	Certified 2010	Rokan Hilir District – Riau			
		Manggala 2	Certified 2010				
		Manggala 3	Certified 2010				
PT. Sime Indo Agro	Certified 2010	PT. Sime Indo Agro	Certified 2010	Sanggau District –West Kalimantan			
Teluk Siak. PT Aneka Inti Persada	Certified 2011	Teluk Siak	Certified 2011	Pekanbaru, Siak District – Riau			
		Pinang Sebatang	Certified 2011				
		Aneka Persada	Certified 2011				
Sungai Pinang. PT. Bina Sains Cemerlang	Certified 2012	Sungai Pinang	Certified 2012	Musi Rawas District – South Sumatera			
		Bukit Pinang	Certified 2012				
Sukamandang. PT. Kridatama Lancar	Certified 2011	Sukamandang	Certified 2011	Seruyan and East Kotawaringin District – Central Kalimantan			
		Sapiri	Certified 2011				
		Baras Danum	Certified 2011				
		Kuala Kuayan	Certified 2011				
Pemantang. PT. Teguh Sempurna	Certified 2011	Pemantang	Certified 2011	Seruyan and East Kotawaringin District – Central Kalimantan			
		Kawan Batu	Certified 2011				
		Hatan Tiring	Certified 2011				
		Batang Garing	Certified 2011				
Alur Dumai. PT Lahan Tani Sakti	Certified 2011	Alur Dumai	Certified 2011	Rokan Hilir District – Riau			
Teluk Bakau. PT. Bhumireksa Nusa Sejati	Certified 2011	Teluk Bakau	Certified 2011	Indra Giri Hilir District – Riau			
		Nusa Perkasa	Certified 2011				
		Nusa Lestari	Certified 2011				
Mandah.	Certified	Mandah	Certified 2011	Indra Giri Hilir District – Riau			

PT. Bhumireksa Nusa Sejati	2014	Rotan Semelur	Certified 2011	
Angsana Mini. PT Sajang Heulang	Certified 2011	KKPA-1 PT.SHE Pantai Bonati	Certified 2013 Certified 2011	Tanah Bumbu District – South Kalimantan
Angsana. PT Ladangrumpun Suburabadi	Certified 2011	Angsana Gunung Sari KKPA-4 PT.SHE	Certified 2011 Certified 2011 Certified 2013	Tanah Bumbu District – South Kalimantan
Mustika. PT Sajang Heulang	Certified 2013	KKPA-2 PT.SHE KKPA-3 PT.SHE KKPA-5 PT.SHE	Certified 2013 Certified 2013 Certified 2013	Tanah Bumbu District – South Kalimantan
Gunung Aru. PT Bersama Sejahtera Sakti	Certified 2011	Gunung Aru Gunung Kemasam Laut Timur Pantai Timur	Certified 2011 Certified 2011 Certified 2011 Certified 2011	Kotabaru District – South Kalimantan
Bebunga. PT. Langgeng Muaramakmur	Certified 2011	Sungai Cengal Bebunga KKPA Sungai Cengal	Certified 2011 Certified 2011 Certified 2015	Kotabaru District – South Kalimantan
Pondok Labu. PT Paripurna Swakarsa	Certified 2012	Binturung Pondok Labu Rampa Sesulung	Certified 2012 Certified 2012 Certified 2012 Certified 2012	Kotabaru District – South Kalimantan
Selabak. PT Swadaya Andhika	Certified 2012	Selabak Randi Sangkoh Lanting	Certified 2012 Certified 2012 Certified 2012 Certified 2012	Kotabaru District – South Kalimantan
Rantau. PT Laguna Mandiri	Certified 2012	Rantau Matalok	Certified 2012 Certified 2012	Kotabaru District – South Kalimantan
Betung. PT Laguna Mandiri	Certified 2014	Betung Sekayu	Certified 2012 Certified 2012	Kotabaru District – South Kalimantan
Ungkaya. PT Tamaco Graha Krida	Certified 2012	Ungkaya Plasma TKG	Certified 2012 Audited 2015	Morowali District – Sulawesi Tengah
Ladang Panjang. PT Bahari Gembira Ria	Certified 2012	Ladang Panjang Plasma BGR	Certified 2012 2015	Muaro Jambi District - Jambi
Rantau Panjang. PT Guthrie Pecconina Indonesia	Certified 2012	Rantau Panjang Bumi Ayu Karang Ringin Napal Mangun Jaya KKPA Sungai Pinang	Certified 2012 Certified 2012 Certified 2012 Certified 2012 Certified 2012 2015	Musi Banyuasin District – South Sumatera
Blang Simpo. PT Perkasa Subur Sakti	Certified 2013	Tamiang (PT PPP) Batang Ara ((PT PSK)) Blang Simpo-01 (PT PPP) Blang Simpo-02 (PT PPP)	Certified 2013 Certified 2013 Certified 2013 Certified 2013	Aceh Tamiang and East Aceh District – Nanggroe Aceh Darussalam
MAS.	2020	MAS 1	2020	Sanggau District – West Kalimantan

PT Mitra Austral Sejahtera		MAS 1	2020	Ketapang District – West Kalimantan	
		MAS 1	2020		
Lembiru. PT Sandika Nata Palma	Certified 2014	Lembiru	Certified 2014		
		Awatan	Certified 2014		
	New Development	Karya Palma	2016		
PT Budidaya Agro Lestari	2018	Pelanjau	2018		
		Sungai Putih	2018		
		Baturus	2018		
Sime Darby telah mendapatkan sertifikat pada seluruh 39 unit management POM di Malaysia dan 21 unit management POM di Indonesia. Terdapat perubahan Time Bound Plan yang menyebabkan perusahaan menunda proses sertifikasi dengan penjelasan sebagai berikut:					
<ul style="list-style-type: none">PT Mitra Austral Sejahtera, masih terdapat permasalahan (issue) social yang masih belum terselesaikan yaitu dari Serikat Petani Kelapa Sawit (SPKS), namun perbaikan sedang berlangsung.PT Budidaya Agro Lestari menunggu Surat Keputusan Rencana Tata Ruang dan Wilayah Provinsi Kalimantan Barat. TBP untuk Karya Palma Estate (PT Sandika Nata Palma) direncanakan tahun 2016.					
1.10.2	Progress of Associated Smallholders and Outgrowers for Certifiable Standard				
	PT Tunggal Mitra Plantation does not receive from other sources that are not certified				

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
RC	<p>1. Oktovianus Rusmin (Lead Auditor). Bachelor's Degree in Social and Political Sciences Department of Anthropology. Specialists in the field of Social and Cultural Social Impact and Conflict Resolution) and HCVF. Already participated in Forest Management Auditor Training (FSC Standard), ISO 14001, ISO 9001:2008, and Environmental Management System Training SVLK (wood legality) Auditor, Indonesian Sustainable Palm Oil (ISPO) and RSPO Lead Auditor Training. He was several times involved in the assessment of Sustainable Forest Management Certification (Standard LEI) and Gap Analysis Audit (FSC Standard). Had worked at the Center for Study of Anthropology University of Indonesia and Social Advisor at Tropical Forest Trust (TFT) Indonesia. He was numerously involved in Social Impact Assessment and HCV Identification in Palm Oil Plantations and Natural Forest concessions. Have been approved as HCV assessor by RSPO for Social Discipline Specialist. In this assessment he conducted an assessment on Legality, Social and Supply Chain Aspect.</p> <p>2. Naila Karima (Auditor). Bachelor of Public Health, Department of Occupational Health and Safety. Faculty of Public Health, University of Indonesia. She has experience working in private oil palm plantation companies in Indonesia. Who had attended the training including training understanding the RSPO certification system, ISPO Lead Auditor, and certified Integrated Management System (Occupational Health and Safety Management System OHSAS 18001:2007, Environmental ISO 14001:2004, Quality ISO 9001:2008). In this assessment, she conducted an assessment on Best Management Practices, Good Manufacturing Practices and OHS/workers.</p> <p>3. Sapto Hadi Winarno (Auditor). Bachelor of Forestry Department of Forest Products Technology, Faculty of Forestry, Bogor Agricultural University. He has work experience in consultant aerial photographs from 1994 s / d 1997. He worked as a Manager in the timber company (HPH) and Manager GPA on oil palm plantations. In 1998 s / d in 2005 is believed to be the Director of Operations of domestic and foreign manufacturing companies .; As assessor / auditor / lead auditor on Certification of Sustainable Forest Management (SFM) and Timber Legality Certification (SLK) since 2005 until today. Having a competency certificate and a prerequisite for SFM auditors and VLK Industrial Ecology, ISPO Auditor Training, Awareness of ISO 9001; 2008. Other professional experiences include: Speakers at the workshop SFM and SLK for the Forestry Independent Monitoring Agency (JPIK). He currently works as a professional for the forestry and plantation. In the stage-1 activity ISPO this time make an assessment on aspects of Environmental, Waste Management (B3, Liquid and non-B3) and Greenhouse Gases. In the re-certification activities to assess the environmental aspects and HCV..</p> <p>4. Radytio Puspanjana (Trainee Auditor). Bachelor of Agriculture, Soil Science, University of Andalas Padang, West Sumatra. Experience working in Plantation Office of Riau Province section of the Estate Development, Ever involved as team members in the activities Mapping Riau Provincial Spatial 2014, Plantation Business Assessment Team Members Riau Province Year of 2014, the Audit Indonesian Sustainable Palm Oil (ISPO). The training which have been followed, among others; Survey and Mapping (GIS) organized the National GMIT, Auditor Awareness ISPO and RSPO. At times in the activities Re certification, auditors concerned do on the aspects of Agronomy and soil conservation.</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
RC	<p>Number of auditors : 4 auditors</p> <p>Number of days for RC at site : 4 days</p> <p>Number of working days for RC at site : 16 Working days</p>
2.2.2	Assessment Process
RC	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the Manggala POM and its supply base (PT Tunggal Mitra Plantation) to the requirements of RSPO Principles and Criteria (P&C) for for the Production of Sustainable Palm Oil - April 25th, 2013, and RSPO Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014 (Module D for CPO Mill).</p> <p>The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or</p>

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. Several opportunities for improvement of the results Re-Certification delivered by the auditors to the management unit and the results are the subject will be verified at the next assessment (ASA-1.1)

Basic selection is determined by sampling examples auditor team on the following considerations:

1. Number of locations determined by the formula $0.8 \sqrt{y}$. There are 3 estates PT TMP, the number of estates in the visit based on the formula is 2 estates, namely Mangala 2 Estate and Manggala 3 Estate..
2. The location was chosen to represent each of the operational areas of work Mangala POM and Estates consisting of Mangala 2 and Manggala 3.
3. Consideration of issues arising from the outcome document review and public consultation with stakeholders.

Improvement of findings from Re-Certification assessment findings were observed by auditors at this ASA-1.1. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU).

The assessment program please find Appendix 2

2.2.3	Locations of Assessment
RC	<p>Manggala POM</p> <ol style="list-style-type: none"> 1. Processing (from loading ramp to dispatch). Observation related to the processing of FFB into CPO and fire-emergency facilities in mill. Interview with mill's staff (boiler's operator, engine room's operator) related to medical examination, operator license, wage, complaint mechanism, the implementation of Occupational Health and Safety, training, safe work procedure, the availability of PPE and the mechanism of supply chain with a segregation model. The entire station from <i>loading ramp</i> to <i>land application</i>. In general, mills were well operated and in accordance with the operational standard. <i>Land application</i> was well implemented without the sign of water and air pollution. 2. Chemical warehouse. Observation on chemical handling and interview with chemical warehouse's staff regarding the procedure for handling chemical material, handling emergency situation as well as the implementation of occupational health and safety. 3. Water Treatment Plan. Observation over the proficiency of clean water facility. 4. Workshop. Observation over the proficiency of emergency response facilities and occupational health and safety (first aid box) and interview with welders related to training, medical examination, the implementation of occupational health and safety, safety work procedure, complain mechanism, freedom to join worker union and wage. 5. Diesel fuel tank. Observation over the proficiency of fire-emergency response tools. 6. Temporary hazardous waste. Observation on hazardous waste management based on the applicable regulations and interview with the hazardous waste landfill's staff related to medical examination, management of hazardous waste and the proficiency of pollution and exposure response tools. The actual size of hazardous waste landfill was = 5mx7.5mx3.5m. Landfill was completed with fire extinguisher tools, first aid box, SOP for emergency response, and PPE such as safety shoes, gloves, spectacles and mask. Additionally, auditor found the input balance (hazardous waste balance), hazardous wastes report, minutes of hazardous waste handover with CV Amindi Barokah Medan. The last transport was based on the data on 1st July 2015. The existing hazardous waste in the mill, such as: used-oil, used-packages, bulb, gloves, contaminated goods, fibre and filter of used-oil. 7. Waste Water Treatment Plan (WWTP). Observation on wastewater treatment plant in mill and pollution reduction management. The observation on IPAL pond showed that there were 10 active ponds, which were completed with flow meter inlet and outlet with flow meter magnetic type. The location for waste water sampling was determined in a permanent position. 8. Verification on SCCS and interview with weight bridge staff and grading staff. 9. The location for land application. Observation was conducted at Block E 11, for other locations were under the installation process. Location LA about 60.93 Ha that completed with monitoring well. <p>Manggala 2 Estate</p> <ol style="list-style-type: none"> 1. Block E02 Division 4. Observation on harvesting activity and interview with supervisor and harvesting staff related to work mechanism, work procedure, criteria for harvested-fruit, wage, <i>premi</i> and harvesting fine, staffs'

welfare, membership on worker union and implementation of occupational health and safety in a form of safe work procedure, the utilization of PPE and the proficiency of first aid kits.

2. **Block E04 Division 3.** Observation on fertilization and interview with supervisor and fertilizer staff related to work procedure, fertilization doze, the application technique of fertilization, the implementation of occupational health and safety such as safe work procedure, the utilization of PPE, periodic medical examination and the proficiency of first aid kits. Additionally, interview related to wage mechanism, insentif and membership on BPJS (manpower social insurance).
3. **Block J01/J47 Division 1.** Observation on spraying activity and interview with supervisor and spraying team related to work procedure, the application of insecticides, the doze of material as well as the implementation of occupational health and safety (the utilization of PPE, safe work procedure, periodic medical examination). Moreover, there was a prohibition for pregnant and lactating workers to work with chemical material. The wage mechanism, premi, the status of staff, membership on BPJS (manpower social insurance).
4. **Agrochemical Warehouse.** Observation on pesticide storage's activities, the availability of MSDS, work procedure and hazardous material symbols.
5. **Emergency Response Post.** Observation on the proficiency of fire extinguisher facilities and infrastructures, monitoring on its completeness and interview with emergency response team.
6. **Hazardous waste warehouse.** Observations on temporary hazardous waste warehouse before the waste was send to the licensed hazardous waste warehouse in the mill.
7. **Area HCVA Block A.** Observation on the management of HCV area, such as the riparian area of Bangko River (1°34'22.36" ; 100°40'41.90") with an average width of 50 meter to the right and to the left of river's body. The location has been installed with signboard and has been cultivated with various type of tree, such as: *mahoni*, *randu*, *waru*, *bamboo*, *trembesi* and *vertiver grass* as enrichment vegetation in riparian area as well as to fight the erosion. There was an outer-sign to mark the riparian area in a form of yellow paint in palm trees.
8. **Location for the potential HCV in a form of Buffer Zone for natural forest** for HCV 1.1, 1.2, 1.3 & 1.4 (1°32'47.63" ; 100°39'43.85") in Block D3. Local communities occupied the area with a broad about 229 Ha. The area has been cultivated with rubber tree by local communities.
9. **Location for HCV in a form of ecosystem for wildlife** for HCV 1.1, 1.2, 1.3 & 1.4 (1°31'31.45" ; 100°37'50.05") at Block D3. Local communities occupied the area with a broad about 47 Ha. The area has been cultivated with rubber tree by local communities and consisted of wildlife special such as monkey.
10. Location at Block J001, I2 and I3. For observing the replanting location.
 - Replanting location is a relatively flat and/or minor wave at Block I3
 - Block I2 (1°29'53.17" ; 100°38'36.42") has a vocal piding (silt pit) treatment and cultivated with cover crop
 - Block I3 (1°29'58.50" ; 100°38'11.27") has a terrace ring and application of empty fruit bunches for about 60 hectare. This location was cultivated in July and August 2015.
11. **Monitoring on subsidence at Manggala 2 Block D05;** subsidence stake (1°33'08.48" ; 100°38'40,12") has been installed on 28th May 2009. There was a temporary Bund off.
12. **Monitoring on Over Flow Block F07** (1°32'02,34" ; 100°37'39,64"). Company developed 8 permanent over flows 8 that spreading at Block J01=1, I02 =2, H02 =2, J03 = 1, F07 =1, E03 =1, and F04 = 1
13. **HGU boundary stake:** Stake PN 63 (Block J 004), Stake BPN 64 (Block J 004), Stake BPN 65 (Block I 005) and some additional stake (small stake), stakes were installed properly and in a good condition.

Manggala 3 Estate

1. **Monitoring on boundary stake.**
 - Observation in additional stake location, which is made from *paralone* pipe and completed with cement. The examined-additional stake was located at Block J1 (around 1°29'47.94" ; 100°46'33.56"). The stake was installed in every 200 meters. Stakes inside the estate area were well maintained.
 - Examinations over BPN stake 49 at block I18 (1°30'11.35" ; 100°41'09.28"). The location is side by side with Sukajadi Village. Local communities occupied this area.
 - Examination over BPN stake 46 (1°29'53.55" ; 100°41'35.01")
 - BPN stake 49 and BPN stake 46 are in good condition and well maintained
2. **Subsidence stake at Block K3** (1°28'41.84" ; 100°45'36.01"). Stake was installed in January 2015.
3. **Water Level.** Observation was conducted at block K5 where the number of water level was stood at 40 cm and at block J5 where the water level stood at 30 cm.
4. **Empty fruit bunches application.** At block K05 that was applied for plantation in June 2015 and at block H13.

Based on the explanation, the empty fruit bunches application in Minamas was treated as a supplementary fertilizer because the main fertilizer was still used.

5. **Block Y17 Division 4, Harvesting activities.** Observation and interview with harvesting staff related to the understanding over SOP, the utilization of PPE, staff welfare and housing facilities.
6. **Block H08 Division 3 Spraying activities.** Observation and interview with spraying supervisor and spraying team related to company's policy on the application of chemical material in riparian areas, periodic medical examination, proficiency and sufficiency of PPE, training on spraying technic, training on occupational health and safety, training on first aid, complain mechanism especially related to gender issues, staff welfare and wage.
7. **Block H016 Division 4, Integrated pest management.** (The presence of owl barn box, manure, prey, and owls).
8. **Block H016 Division 4, fertilization activity.** Observation and interview with fertilization staff related to company's policy on fertilization application in riparian area, periodic medical examination, utilization and sufficiency of PPE, training on spraying technical, training on occupational health and safety, training on first aid, complain mechanism especially related to gender issue, staff welfare and wage.
9. **Agrochemical warehouse.** Examination over the completeness of standard safety sign for chemical warehouse and the display. First aid boxes were available in chemical warehouse and staff understood the first aid. There was no chemical material with an active *paraquate*
10. **Hazardous waste warehouse.** Examination over the hazardous waste management that was generated by estate. The chemical warehouse has been secured, which made them isolated and under restricted access. Moreover, according to warehouse staff, hazardous waste was sent to temporary landfill at Manggala POM.
11. **Emergency response post.** Observation on the limitation of fire extinguisher facilities and infrastructure, monitoring over the completeness and interview with emergency response team.
12. **BSS House.** Observation on PPE's warehouse and washing place for spraying tools.

Public Consultation with the Government of Rokan Hilir District

1. **Plantation Agency of Rokan Hilir District.** Interview related to the mandatory plantation report of PT TMP and other responsibilities, including other related issues. For instance, the CD/CSR program and information on social interaction between plantation staff and local communities.
2. **Manpower Agency of Rokan Hilir District.** Interview related to regular responsibilities, for instance mandatory report on manpower and issues on industrial relation between company and staff.
3. **Environment management Agency of Rokan Hilir District.** Interview related to periodic (semester) environment management plan and environment monitoring plan report to head of environment management agency as well as the impact of estate's operation activities and mill of PT TMP.
4. **National land agency of Rokan Hilir District.** Interview related to the legality status of company. (HGU, IUP, SPUP, and so forth).

Local Villages

1. **Sukamulya Village, Pujud Sub-district, Rokan Hilir District.** Consultation on the positive and negative impact of estate operation toward local communities and the granted-CSR. Discussion (*Focus Group Discussion*) in village office related to the CD/CSR program, social interaction and other environment/ social aspects.
2. **Sido Rukun Sub-village, Siarang Arang Village.** Consultation on the positive and negative impact of estate operation toward local communities and the granted-CSR. In general, local communities gave a positive impression toward the company's existence. There was no issue related to environment pollution and other negative issues. Local communities were hired and occupied various positions in company and some local communities became a vendor for company.

Public Consultation - Internal Stakeholder

1. **Committee of worker union of agriculture and plantation Manggala 2 and Manggala 3.** Interview with chief and committee of SPPP SPSI Manggala related to freedom to actively engage in union, minimum wage, and compliance over company's responsibilities and industrial relation.
2. **Gender Committee Manggala-2 Estate and Manggala-3 Estate.** Interview with gender committee related to routine activities and the implementation of company's policy related to protection on reproductive rights and prevention of sexual harassment.
3. **Local contractor.** Interview with the contractor associated with labor agreements, the agreed method of payment, the rights and obligations of contractors.

2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
RC	<p>Summary of stakeholder consultation process</p> <p>Consultation of stakeholders for PT Tunggal Mitra Plantation was held by:</p> <ol style="list-style-type: none"> 1. Public announcement on website MUTU (www.mutucertification.com) at July 28 2015. 2. Public consultation meeting with external stakeholder (Government Rokan Hilir District) by interview at September, 2nd 2015. 3. Public consultation meeting with external stakeholder by interview local stakeholders conducted by visits to villages and interviews with local peoples at 1 until 2 September 2015. 4. Public consultation meeting with internal stakeholders (worker union and committee gender) by interviews and local stakeholders conducted by visits to villages and interviews with local peoples. <p>Numbers of input from stakeholders were clarified by PT Tunggal Mitra Plantation.</p>
2.3.2	Stakeholder contacted
	<i>Please find appendix 1</i>
2.4	Determining Next Assessment
	The next visit (ASA-1.1) will be determined one year after this RC (September 2016).

3.0. ASSESSMENT FINDINGS

3.1. Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Manggala POM – PT Tunggal Mitra Plantation subsidiary of Sime Darby Plantation Sdn Bhd, operation consisting of one (1) mill and two (2) oil palm estates.

During the assessment, there were two (2) Nonconformities were assigned against Major Compliance Indicators, one (1) nonconformity were assigned against Minor Compliance Indicators and four (4) opportunities for improvement were identified.

Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5. The company has already prepared and implemented the corrective action(s) that had been reviewed and accepted by Auditor(s) in form of documentation evidence(s) e.g. those corrective action(s) taken that consist of two (2) Major non-conformities had been closed out and one (1) Minor non-conformity shall be verified during next assessment.

MUTUAGUNG LESTARI found that Manggala POM – PT Tunggal Mitra Plantation subsidiary of Sime Darby Plantation Sdn Bhd complied with the requirements of **RSPO Principles and Criteria (P&C) for for the Production of Sustainable Palm Oil - April 25th, 2013, and RSPO Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014 (Module D for CPO Mill)**

Therefore MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is issued.

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.		
PT TMP has a mechanism to manage document (RSPO/1.1 & 1.2 /P.D) dated 01 st August 2011, which states that the requested-documents by stakeholders are kept for 3 years. Information request and grant request are recorded in information request logbook, hence will be responded and being kept by head of estate and mill administration unit. Each information request that has been responded by company will be recorded in incoming letter logbook, such as:		
Manggala 2 Estate:		
Letter from Penghulu Siarang – arang on 8th March 2015 with letter number 140/PEMDES/III/2015/021 related to heavy equipment request. The management unit has responded the request on 20th March 2015.		
Manggala 3 Estate:		
Invitation letter on the innaugural of secretary of Sub-district on 29th July 2015 with letter number 025/KCP/-UM/2015/235 that has been responded by the management unit by attending the innaugural prosesion on 31st July 2015.		
Manggala Mill:		
letter from the government of Rokan Hilir Sub-district, Tanah Putih District on 18th May 2015. Letter number 022/K-R-O/Sekep/MS/V/11 with a subject of grant request and the utilization of soccer field that has been responded by the management unit by giving grant on 10th June 2015 and approving the utilization of soccer field by the manager of Manggala Mill.		
	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.		
PT TMP has a mechanism for managing the documents (RSPO/1.1 & 1.2 /P.D) dated 01 st August 2011 related to requested-documents by stakeholders. The machinism for managing document has been clarified and explained the type of documents that can be accessed by public, such as Vision and Mission, policy on quality, occupational health and safety, environment and social, legal documents, environment impact assessment, HGU,company's reports, document of work processing and standarization.		

Status: Comply	
1.3 Growers and millers commit to ethical conduct in all business operations and transactions.	
<p>Company has a policy No. 440/HRM-COC/07 on 24th May 2007 regarding the Code of Conduct (ethical code, which explains: Each individual in Minamas Plantation should not have conflict of interest that can influence the decision making that lead to company's negative performance.</p> <p>Corporate Governance:: company has specific structure and process in order to enhance the business and accountability by considering the interest of shareholder in a long-term based on the applicable regulation and ethics.</p> <p>The policy explains code of conduct for staff, code of conduct for staff inside and outside company, code of conduct for higher staff and lower staff. Company and the entire staff are forbidden to directly or indirectly give, offer, or receive precious things that can be categorized as bribery to or from customers, vendors, government officers and other parties that can influence the decision.</p>	
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.	
<p>Company showed some evidences over its compliance toward the applicable regulation. For instance, company showed its mill and estate's compliance toward the occupational health and safety regulation, such as:</p> <p>Operator boiler has the occupational health and safety license No. 12.P.06.389 OPK3-PUBT-B.I/XI/2012 that is valid until 30th October 2017 based on Ministry of Manpower Decree No. 01 in 1988.</p> <p>Operator hoisting crane has the occupational health and safety license No.12.11923-OPK3-PAA/VIII/2012 that valid until 15th August 2017 based on Ministry of Manpower Decree No. 09 in 2010.</p> <p>Welder certificate No. S.297/JL/PNK3/XI/12 that was issued on 06th November 2012 welder class III based on Ministry of Manpower Decree No. 02 in 1982.</p> <p>PPE proficiency based on work risk in mill and estate that is inline with Ministry of Manpower Decree No. 08 in 2010. The observation over spraying result at Block J01/J47 Division 1 Manggala 2 Estate and in Block H08 Division 3 Manggala 3 Estate showed that staff was using PPE, such as mask, spectacles, apron, rubber and cotton gloves, shoes.</p> <p>There was a list of compliance toward the applicable regulation that was developed by PT Tunggal Mitra Plantation for each division, such as 42 regulations that related to manpower and occupational health and safety, 41 regulations related to environment, 10 regulations related to cultivation and plantation, 8 regulations related to legality.</p> <p>SOP for Evaluation on regulation requirement (701/TQEM-ESH/10) explains that the evaluation was carried out periodically every 6 months. Company conducted consultation with related institution in order to update the regulations. PSD (Plantation Support Department) department, law group and legality, as well as ESH Manager is responsible to identify, makes summary, updates and evaluates the compliances toward the applicable regulation, as well as its revision. Manager Estate supervises the implementation.</p> <p><u>Legality of ownership and management of estate/ mill</u></p> <p>Location permit is inline with head of national land agency decree of Bengkalis District No. 21-401/PGT/IL/X/1997 on 17th October 1997 regarding the granting of location permit forestate. The broad of location permit covers an area of 16,660 Ha.</p> <p>Certificate for bussiness title (HGU) No. 2 in 1999 is inline with measurement letter No. 16/1998 on 28th July 1999. The broad of HGU covers an area of 13,836 Ha. HGU permit is valid until 28th July 2034.</p> <p>Plantation permit in a form of SPUP No. 202/Menhutbun – VIII/2000 on 10th March 2000 covers an area of 13,836 hectar and mill with capacity of 45 ton FFB/Hours</p>	
Status: Comply	
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.	

Ownership and management's documents over PT Tunggal Mitra Plantation are based on:

The allocation of subsidiary area based on Governor of Riau Decree No. 44/II/1992 on 29th January 1992 regarding the subsidiary land of \pm 18.000 Ha in Tanah Putih Sub-district, Bengkalis District for the development of palm oil plantation on behalf of PT Tunggal mitra Plantation.

Forest release certificate is based on Ministry of Forestry Decree No. 793/Kpts-II/1996 on 20th December 1996 regarding the release of some part of forest area that located in a group of n S. Bangko forest – S. Titi Kayu Ara, Bengkalis District, Riau Province, with a broad of 13,370 Ha for palm oil plantation on behalf of PT Tunggal Mitra Plantation.

Forest release certificate is based on Ministry of Forestry Decree No. 794/Kpts-II/1996 on 20th December 1996 tentang Pelepasan sebagian kawasan hutan yang terletak di kelompok hutan S. Panggau, Kabupaten Bengkalis District, Riau Province, with a broad of 2,790 Ha for palm oil plantation on behalf of PT Tunggal Mitra Plantation.

Location permit based on Decree from National land agency of Bengkalis District No. 21-401/PGT/IL/X/1997 on 17th October 1997 regarding to location permit for plantation on an area of 16,660 Ha.

Bussiness title certificate (HGU) No. 2 in 1999 based on measurement letter No. 16/1998 on 28th July 1999. The broad of bussiness title covers an area of 13,836 Ha. Bussiness title is valid until 28th July 2034.

Plantation title in a form of SPUP no. 202/Menhutbun – VIII/2000 on 10th Marvh 2000 covers an area of 13,836 hectar and mill with a capacity of 45 ton FFB/Hour.

In PT TMP there were boundary stakes in each estate area, icluding:

Manggala Estate 1: Total = 94 stakes: national land agency stake BPN (huge stake) = 1 and additional stake (small stake) = 93

Manggala Estate 2: Total : 112 stakes: national land agency stake BPN (huge stake) = 3 national land agency stake BPN (huge stake) = 99

Manggala Estate 3: Total 127 stakes: national land agency stake BPN (huge stake) = 2 national land agency stake BPN (huge stake) = 125



PT Tunggal Mitra Plantation has a procedur to maintaint stakes' condition, in a form of Standard Operating Procedure for national land agency stake (Document: PDKK, start into effect since 04th July 2010). This procedure becomes the basic guideline on periodic maintenance of national land agency. Evaluation on the sample of boundary stake in Manggala 2 and Manggala 3 Estate showed that the condition of stakes were good installed and the signs were clearly readable.

Document verification and field visit to plantation in Sukamulya Village and Siarang-arang Village (Sido Rukun Sub-village), and consultation with several related-institutions Roka Hilir District (National land agency in District level&Plantation agency) showed that there were no conflict between PT TMP and local coomunity in plantation area. The mangement unit of PT TMP has had the procedure for land occupation clearance (343/PSD-OKUP/11). Moreover, there is a record in a form of Memorandum from Head Plantation Upstream Indonesia on 22nd June 2012, which states that the implementation of the procedure of land occupation clearance starts into effect on 1st July 2012. There are evidence in a form of land compensation record, for instance: land compensation on 21stAugust 1991 that covers the area of236.40 in Siarang-arang Village, Tanah Putih Sub-district, Bengkalis District. Additionally, land compensation document in1997, which covers an area of301,609 in Tanah Putih Sub-district, Bengkalis District.

Status: Comply

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.

Based on areal statement document, the HCV identification report was conducted by POLLITO consultant in 2009 and completed with stakeholders' consultation in Sukamulya Village and Perkebunan Siarang-arang Village (Sido Rukun Sub-village), as well as consultation with related agencies in Roka Hilir Sub-district (the National Land Agency office and Plantation and Forestry Agency in district level). Its known that there were no areas - inside and surrouding of PT TMP plantation - under the indigenous or traditional right.

some evidences on land compensation have been presented, such as:

And compensation on 21st August 1991 that covers the areaof 236.40 in Siarang-arang Village, Tanah Putih Sub-district, Bengkalis District.

Land compensation in 1997 that covers the area of 301,609 in Tanah Putih Sub-district, Bengkalis District.

Land compensation has been completed with some documents, such as:

Minutes of meeting over land compensation process by involving communities' leaders in the discussion process in order to achieve the agreement over the amount of compensation.

Land compensation letter is approved by Head of Sub-district and Head of Village.

Hand over document (invoice)

Acknowledgement letter from the owner

Map of the area that is approved by Head of Neighbourhood, Head of Village (covers the name of owner, location, briad and 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.

Tunggal Mitra Plantation has a work plan that is described in distributed document of projected-budget 2015 - 2020 for each management unit in Manggala Mill and Manggala Estate. Mill's projection document consists of information about the processed FFB, CPO production, Palm Kernelproduction, and Total Palm Extraction. Meanwhile for Estate, the work plan information consists of the broad of planted area, broad of area that can be harvested, FFB's production (Ton), transported FFB, output (Ton/ha), direct cost per kg FFB, fix cost per kg FFB, direct cost per hectare of ready-to-harvest plantation, and fix cost per hectare of ready-to-harvest plantation.

Year	2015/2016	2016/2017	2017/2018	2018/2019	2019/2020
Processed FFB (ton)	276,167	164,209	155,732	162,176	169,290
CPO (ton)	65,590	39,000	36,986	38,922	40,630
OER (%)	23.50	23.50	23.50	24	24
PK (ton)	13.808	8,210	7,787	8,109	8,464
KER (%)	5.00	5.00	5.00	5.00	5.00

Every year the unit management is conducting evaluation over the realization of annual work plan at the same time with financial work plan (budget) for the next year and comparing it with the 5 years work plan. The evaluated issues such as the changing on statement area, production and production cost, manpower, housing and buildings, average-wage analysis and interest rate. The evaluation revealed that company has adjusted the annual work plan projection and 5years projection plan.

Company has adjusted the long-term replanting plan in a form of Long Range Replanting Programme (LRRP) document and Replanting Plan map in 2015-2020. The objective of the plan is to redesigning the previous block. PT TMP set the regulation, such as the age of plantation should be at least 25 years old, yield under 18 ton/ha, the height of plan should be at least 15 meter and the replanting will be conducted in a centralized system and following the operational scheme such as BHS (Block Harvesting System), BMS (Block Management System), BSS (Block Spraying System). Moreover, the replanting activity has been started in 2012-2013 for Manggala 1 Estate, in 2013-2014 for Manggala 2 Estate and in 2011-2012 for Manggala 3 Estate.

Estate	Year	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020
Manggala 2	Broad	398.40 ha	383.70 ha	346.70 ha	385.60 ha	384.30 ha
	Cultivation year	1991, 1992	1992	1993, 1994, 1997	1992, 1994, 1997	1994, 1998, 1999
Manggala 3	Broad	401.01 ha	338.44 ha	279.17 ha	451.80	395.49
	Cultivation year	1990-1991	1991, 1998, 2000, 1994, 1997	1993	1990, 1995	1997

The implementation of replanting activity in Manggala 2 Estate covered an area of 516.20 ha with detail: in 2013-2014 covered an area of 246.10 ha (Block H01, I01, J01 and J02) and in 2014-2015 covered an area of 270.10 ha (Block H02, I02, I03 and J03). Meanwhile for Manggala 3 Estate, the total of replanting activities covered an area of 1,327.69 ha with detail: in 2011-2012 covered an area of 352.01 ha, in 2012-2013 covered an area of 319.94 ha, in 2013-2014 covered an area of 331.82 ha, and in 2014-2015 v 355.99 ha

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.

Under the Re-Certification activity, there was no revision over SOP that related to plantation management (from LC to harvesting) and SOP for mill's operation activities (from acceptance, processing to CPO & PKO dispatch).

Manual Reference for palm oil cultivation No. Policy; 110/EST-ARM/13 consists of 18 chapters/including the cultivation technic based on memorandum from Head Plantation Upstream Indonesia on 16th September 2013. The chapters including: cultivation's material, nursery technic, Replanting, land preparation, plantation density, year for the first time harvesting, field maintenance, fertilisation, canopy management, water management in beach area and cultivation in peat area, ablation, standard of ripeness, harvesting spin, loose fruit collection, plantation protection, weed control, establishment of cover crop such as nut vegetation, and record over rain fall rate.

Field observation and interview with personnel in Manggala 2 Estate (harvesting staff at Block E02 Division 4, harvesting staff in E04 Division 3, spraying staff at Block J01 Division 1) and Manggala 3 Estate (harvesting staff at Block J17 Division 4, fertilization staff at H016 Division 4, spraying staff at Block H08 Division 3) revealed that staff have applied the SOP related to plantation maintenance, plantation protection, and harvesting based on the applicable regulation.

SOP No.110/POD-FAC/07, CHAPTER I regarding the principle of palm oil management, including: Fruit acceptance (1.1), sterilization (1.2), Stripping (1.3), Digesting (1.4), Pressing (1.5), Clarification (1.6), separation between nut and fibre (1.7), Kernel station (1.8), CHAPTER II. The storage of oil and palm kernel, including the storage of oil palm (2.1), the management of laboratory (5.9), and so forth.

Field observation and interview with staff and processing assistant in Manggala mill revealed that the SOP for mill's operation has been well established. Starting from SOP for processing such as sterilization, stripping, digesting, pressing, clarification, separation between nut and fibre has been well implemented.

Company has a procedure for regular audit over the operation activities. The audit process has been consistently implemented each semester. The audit result will become an object for evaluation and improvement for the management both in capital office management and operational management.

Sample of audit document, such as:

• Mill Visit Report No. Minamas/MGF/02/14-15 by the Mill Advisor on 09 – 11th April 2015

• Audit internal agronomy Manggala 2 Estate in the Plantation Adviser Report (No. SOU 16/MGE-2/01/13-14) on 26 – 28th May 2014, and audit internal agronomy Manggala 3 Estate in Plantation Adviser Report (Ref No: MIN/SOU16/MGR-3/01/14-15) on 09 – 12th September 2014.

Company has consistently documented mill and estate operation activities, as stated in Minamas Management Committee Meeting Report. The Estate report presents information related to Areal statement; organogram, human resources and citizen; housing, building, facilities and infrastructure; rain fall rate; FFB's production; productive plantation; nursery; traction/transport; general cost; production cost; Stock; capital; safety and social and economic condition of staff; duty travel. Meanwhile the mill's report revealed the accepted FFB (FFB acceptance every 2 hours, data over daily acceptance of FFB and FFB's acceptance per 2 hours), production data (production statistic), quality and production lost, production cost, personnel and housing data, material stock and cost recapitulation. Minamas report on Management Committee Meeting in June 2015 stated that for Manggala 2 Estate (Planted area 3,460.53 Ha; mature 2,452.79 Ha; immature 1,007.74 Ha; FFB production 4,715.12 ton), for Manggala 3 Estate (Planted area 3,610.98 ha; mature 3,094.78 ha; immature 516.20 ha; FFB production 6,462 ton) and for Manggala mill (processed FFB 13,203.06 ton; capacity of the mill 50.97 ton FFB/Hour; CPO 3,661 ton, Extraction rate OER 22.37 %; KER 4.52 %)

Status: Comply
4.2
Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.

Manual Reference for palm oil cultivation No. Policy; 110/EST-ARM/13 consists of 18 chapters/including the cultivation technic based on memorandum from Head Plantation Upstream Indonesia on 16th September 2013. The chapters including nursery technic based on memorandum from Head Plantation Upstream Indonesia on 16th September 2013. One of the chapter reveals the necessary actions to improve soil fertility such as by conducting fertilization.

PARAM AGRICULTURAL SOIL SURVEYS (M) Sdn. Bhd conducted the soil analysis for PT TMP in November 2008. This soil analysis is conducted every 5 years by considering the change in organic material of soil and so forth. Soil analysis provides

information such as topography data, type of soil, soil spreading, organic material in the soil and weather. PT TMP classified and mapped type of soil into mineral type and peat type. The mineral type covers an area of 6,454 ha (59%), while the peat type covers an area of 4,436 ha (41%). Based on visual observation, in general the topography condition within TMP operation area is flat to wave.

PT TMP also conducted leaf analysis periodically, every year. MRC department is in charge to conduct the leaf analysis. The result of this analysis will become the guideline to decide type of fertilizer to be used based on the need of the plant. In short, both soil and leaf analysis will become the guideline to decide type and dose of fertilizer to be used.

In order to maintain and enhance soil fertility, PT TMP takes various efforts, such as: empty fruit bunches application and land application from liquid waste, which is generated from mill's processing activity.

Program and implementation of annual fertilization MGE II for period 2013/2014, the recommendation was 2,506.45 ton while the real implementation was 2,507.63 ton with type of applied fertilizer such as Urea, RP, MOP, Kieserite, Borate, Cu SO₄ and Zn SO₄.

Sample of fertilization implementation in MGE 3 Division IV in June 2015 such as:

Block H11 planted year 1993 broad 46.07 ha with a population 5,906 tree, while total amount of fertilizer was 43,090 kg

Block J21 planted year 1992 broad 36.55 ha with a population 4,909, while total amount of fertilizer was 56,209 kg

Meanwhile, from Division I to IV MGE 3 the implementation of fertilization until June 2015 has been conducted for 284,405 trees with total amount of fertilizer 1,840,462 kg.

PT TMP recycled nutrient by applied empty fruit bunches, palm oil midrib, inorganic fertilization including liquid waste application. The implementation data is stated in plantation monthly report.

For instance:

Empty fruit bunches application from period January to July 2015 amount 2,050,950 kg in MGE2 and amount 5,709,160 kg in MGE3; (Program and implementation of empty fruit bunches), has been mapped. For instance Block F-39, F-40 (km 20) MGE-02; the application of empty fruit bunches has been conducted in replanting location where the new cultivated plantation need to be protected from dryness. Subsequently, the empty fruit bunches application has helped to rejuvenate soil moisture.

Organic fertilization by using empty fruit bunches and effluent has been implemented as part of supplement, which has been evenly applied on the entire organic area and has been mapped. Number of the effluent ponds in MGE 01 is 19,900 units with a dose of 750 ton per ha per annum.

Palm oil midrib, silt pit and Nephrolepis have been applied in the entire harvesting block (TM) = 10,868 ha. Has been mapped.

Silt pit = 31,987 unit in 125 Block (silt pit application only conducted within the mineral soil type).

Status: Comply

4.3 Practices minimize and control erosion and degradation of soils.

PT TMP has a marginal soil map with a sufficient scale and legend. PARAM AGRICULTURAL SOIL SURVEY (M) SDN. BHD made this map in November 2008. The map covers an area of 12,404.4 Ha with a scale of 1: 25,000. Company uses the marginal soil type to manage the soil based on type and its contour. For instance: the management for peat area in Manggala-3 Estate. Based on soil analysis, the sloping area within PT TMP ranges from flat to wave/ slope category (0 – 24%). PT TMP also has the procedure for cultivation management for a certain sloping area. Company's strategy to manage the sloping area such as by establishing the silt pit, font stacking, and empty fruit bunches application and cultivation of Nephrolepis. Sp in the block.

While the strategy to manage the land is conducted by using water management (main drain, collection drain, field drain and middle trench). Company has conducted monitoring and evaluation over the decreasing of peat area through periodic M&E activities.

Road maintenance program in each estate unit of PT TMP has been conducted periodically to ensure the infrastructure will support the operational activity effectively, including transportation for fruit and fertilizer. The maintenance program is state in the on-going budget plan and the projection for 3 years ahead.

There is a road maintenance manual for PT TMP in 2015 (until July 2015) that stated in:

Estate	Budget year 2015	
	Program (m)	Realization (m)
MGE-2	13.965	12.652
MGE-3	155.064	204.021

Based on field visit in Block H5 Division III Manggala 3 Estate, company has monitored the level of surface water by using water level stake. The comparison for water level stake is 1:4, which is 1 water level stake is represented 4 blocks. During the field visit, the water surface level was 45 cm. Moreover, company has measured the decrease of peat area in 3 (three) spots. Based on explanation from one of MRC staff and Estate Manager MGE-3, after the replanting, company will add the spot sample to measure the decreased peat area and water level.

Company has evaluated various efforts for managing the level of surface water. There is a monitoring report for the water surface level and the decrease of peat surface. Based on document's review, the monitoring over water level and the decrease of peat surface (subsidence) in 2013, in 2014 and in 2015 has been well implemented. The recorded water level is between 50 and 70 cm, meanwhile the decreasing of peat surface level in average is 0.75 cm. This finding is inline with the SOP for surface water level in peat area No. Policy 110/EST-ARM/08 chapter 10 regarding the water management for coastal area/peat area. Company has taken various efforts to manage peat area, such as: measuring the level of surface water by using water level and pizzo meter. Company is conducting daily monitoring. Company is maintaining the level of surface water, around 50-70 cm below the soil surface.

Field observation and interview with company's staff, its known that the on-going replanting is conducting over the mineral type area and there was no replanting activity within the peat type area.

PT TMP has tried to cultivate in the peat type area, based on minimum standard stated in 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', June 2012, particularly related to water management and soil surface.

Strategy on managing marginal soil is based on company's manual for managing marginal soil type. The identified areas as marginal types have been managed based on SOP for marginal soil management. For instance: for peat area, company has established water canal with a pattern of 1:4 (1 canal for 4 plantation blocks), has conducted fertilization based in recommendation and cultivated *nephrolepis*. Sp. Moreover, company has evaluated the entire activities, which related to the management of marginal soil.

Status: Comply

4.4

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

PT TMP has a memorandum No POD-UM-061/IV/2010 on 8th March 2010 regarding the management and monitoring over HCV area, including: plantations within the riparian area are forbidden to be fertilized or any chemical treatment. Moreover, the plantations that located 50 meter from the right and left side of the water river are forbidden for replating activity and should be gradually replaced with local species of hard wood plantation.

Company has the SOP for Water Management (RSPO/4.4/WM) in 2011 that has been approved by the estate manager. SOP consists of procedure to measure the water gate level, including the periodic monitoring process over the water gate.

Based on field observation in riparian area of Bangko River (Manggala 2), company has taken an action to protect water flow and wet areas. For instance:

Set the riparian area in Bangko River as the HCV 1 area.

Marking the boundary of riparian area within 50 Meter from the right and from the left of river body of Bangko River by installing boundary board and marking the palm oil tree with yellow paint.

Cultivating forest trees and bamboo in riparian areas.

Do not apply chemical material within riparian area

Installing warning board/ prohibition board to cut tree within the riparian areas.

Company protect the water flow by maintaining the condition and sustaining the river body's area (left and right area). Moreover, company did not cut the palm oil tree within the riparian area and leave the condition along that area as natural as possible. The palm oil tree is marked with yellow paint. In addition, company established dam along the river in order to protect leakage during rainy season.

PT TMP has managing mill's waste (liquid waste) by processing the waste in IPAL installation. Company measures the acidity level (pH) in a daily basis and recording the debit in outlet toward land application in order to figure out the volume of applied-liquid waste. Moreover, company takes sample of liquid waste every month and will examine the sample in laboratory to ensure the sample inline with the standard threshold before being applied in the field. The result for liquid waste examination for period June 2015 shows that the BOD and other parameters are below the standard threshold set by Riau Governor Decree No.35 in 2007 and ministry of Environmental Decree No.28 in 2003.

Water utilization in PT TMP is recorded based on flow meter digital that is installed in outlet of the processing installation (before and after the processing of FFB in a daily basis). Monthly budget is 1.35 m³/ton processed-FFB/processes; meanwhile based on water utilization data for period July 2014 to July 2015 amount 251,985 m³ that is used for processing 196,700,620 kg FFB. Subsequently, the ratio is 1.33 m³/ton or under the established budget.

Non-compliance No.2015.01

The company has not provided sufficient evidence of the implementation of appropriate water quality monitoring program as well as available environmental management plan, particularly:

1. Taking sample of plankton and benthos in order to be analysed in a designated laboratory (river closest to the WWTP LA area, treatment pool in the area of POM).
2. Observe the presence and type of nekton in the waters of the activities location.

Observation on 21st September 2015

Company has presented the monitoring result over nekton, however company could not present that the observation result has been analysed and inputted in environment monitoring report and environment management report.

Observation on 22nd October 2015

PT TMP has shown evidence of improvement in the form of:

- Implementation Report RKL / RPL Semester I 2015 (January - June 2015) that has included observations Nekton.
- Proof of delivery of the Report of the RKL / RPL Semester I 2015 (January - June 2015) to Bapedalda Rokan Hilir Environment Agency - Pekanbaru and the Ministry of the Environment Pollution Control Assistant Deputy Agro Industry.

Auditor Conclusion:

Based on the evidence of improvements mentioned above, the discrepancy in these indicators has otherwise been fulfilled.

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

Company has consistently presented the evidence of holistic pest control activities in Estate operation. The holistic pest control was conducted by using natural predator as an *early warning system*. For instance the cultivation of beneficial plant as a natural predator of leaf eater caterpillars, including *Turnera subulata*, *Antigonon leptosus*, *Casia cobanensis* and *Euphorbia heterophilla*. In addition, in order to control rat, company also uses natural predator such as owl (*Tyto alba*). Meanwhile the chemical material will be used when the attack is exceeding the standard threshold. For instance, the utilization of insecticide with an active material of *Cypermethrinto* control horn beetle (*Oryctes rhinoceros*).

The holistic pest control, including:

Establishing and maintaining the Barn Owl Box, replacing wood stick into iron stick.

Program and cultivation of beneficial plant (*Turnera subulata*, *Antigonon leptosus*, *Casia cobanensis*).

Census over the occupation level of Barn owl Box, the census result showed the occupation level is <50% so there is no need to increase the new BOB.

Census over fire and pocket caterpillar.

The control management by using insecticide

The estate management unit has consistently implemented the program and monitoring over pest control based on the plan and has been documented in documents, such as:

Manggala 2 Estate

The recapitulation of pocket caterpillar's census and management for period until 22nd August 2015. Other census for instance at Block D05 with the planted year in 2000 the broad of attack was 55.6 Ha with the average of attack/midrib was 51.3 caterpillar, meanwhile the management in a form of trunk injection with an active insecticide of Asefat 63 kg with a dose of 15gr/tree. Apart from the management of trunk injection, the unit management was also conducting the controlling over pocket caterpillar by using light trap method. This method is used during the butterflies phase in order to reduce the utilization of pesticide.

the map that reveals the spread of pocket caterpillar's attack until August 2015 in Manggala 2 Estate. Division I 155.5 Ha, Division II none, Division III 635.57 Ha and Division IV 208.4 Ha, total 999.47 Ha.

The monthly monitoring record over barn owl box, including the monitoring over 49 unit BOB at Division I in May 2015 shows that there are 12 units of broken barn owl box, 7 owl eggs, 18 owlets, and 12 owls. In addition, field observation at Block I002D Division 1 Manggala 2 Estate shows that the BOBs are in a good condition with 2 owls. Interview with assistant reveals that 1 BOB covers 20 ha area.

The cultivation of beneficial plant (*Turnera subulata*, *Antigonon leptosus*, *Casia cobanensis*) in 2013 – 2014 at Manggala 1 Estate. Program 15,885 meter, implementation 16,895 meter.

Manggala 3 Estate

- The cultivation of beneficial plant in July 2015

Type	Division				Total
	I	II	III	IV	
Turnera subulata	2,500	2,450	1,770	8,610	15,330
Casia cabanensis	13,600	2,600	10,850	880	27,930
Antigonon leptopus	750	28	650	40	1,468
Total	16,850	5,078	13,270	9,530	44,728
Broad	859	848	845	964	3,515
Beneficial plant 1:25	21,646	21,190	21,121	24,088	87,863
%	79	24	63	40	51

The recapitulation of census:

Fire caterpillar and pocket caterpillar in June 2015, with the broad of attacks were 284 Ha with an average 11.29 larvae per midrib. The controlling actions by using the Beneficial Plant until June 2015 *Turnera subulata* 15,265 m; 4.18 m/ha), *Antigonon leptopus* (1,468 m; 0.42 m/ha), *Casia cobanensis* (26,980 m; 7.68 m/ha), drill 32 Ha, trunk injection and fogging is absence.

Rats, Ganoderma, Termite and Oryctes did not attack

The monthly recapitulation over owl, for instance the breeding of owl in June 2015 showed that within 155 unit of barn owl box (BOB), there were 121 eggs, 57 owlets, and 137 owls. Field observation at block H016 Division 4 Manggala 3 Estate showed that BOBs are in good condition and there was a presence of one owl. Interview with assistant revealed that 1 BOB would cover an area of 20 ha.

The unit management has consistently delivered training for its personnel, particularly the one that involved in holistic pest management. Moreover, this effort was well documented. For instance training on fire and pocket caterpillar control by using trunk injection D by assistance team in division IV Manggala 2 Estate on 11th February 2015, training over pocket caterpillar census by Assistant Divisi II Manggala 2 Estate on 04th March 2015, and the management over pocket caterpillar by using trunk injection for PHT personnel was delivered by assistance from Division III Manggala 3 Estate on 06th April 2015. Meanwhile the training materials cover the management of pocket caterpillars by infusing the root and manual by using appropriate dosage based on the research recommendation, the operation of trunk injection, introduction to fuel and oil for trunk injection machine (brand STIHL), calibration over the utilization of fuel for trunk injection, the dosage and the application mode for controlling the pocket caterpillar, the utilization of PPE during the application of trunk injection

Status: Comply

4.6
Pesticides are used in ways that do not endanger health or the environment

Company has consistently used the licensed pesticide from the agriculture department. Type of the used-pesticide in 2014-2015, such as:

Type of Pesticide	No	Brand	Active Material	License	Expiration Date
Herbicide	1	Metaprima 20WG	Methyl metsulfuron	RI.01030120031897	25 th Sept 2018
	2	Capture 100EC	Cypermethrin	RI.01010120072927	09 th January 2018
	3	Kenlon 480EC	Triklopir butoksi ethyl ether	RI.01030120062433	23 rd June 2016
	4	Audit 486SL	Isopropyl amine glyphosate	RI.01030120031863	31 st Dec 2018
Insecticide	1	Decis 25EC	Deltamethrin	RI.01010119799387	04 th January 2018
	2	Basta 150SL	Ammonium glufosinat	RI.010311992111	31 st Dec 2018
	3	Kencepat	Asefat	RI.01010120103756	06 th Sept 2015

Company has consistently presented the record over pesticide utilization, including the utilization of an active material of LD50, the targeted-area, and the amount of applied-active material per ha.

Monitoring on the toxicity of isopropyl amino glyphosate Manggala 1 Estate in 2014/2015. Total production was 60.041 ton, with the broad of area of 3,066.46 Ha. The utilization of isopropyl aminoglyphosate 330.87 litre, the utilization of active material per

hectare was 0.11, the toxicity of pesticide LD50 0.01 ppm.

Monitoring over toxicity of isopropyl amino glyphosate Manggala 3 Estate in 2014/2015. Total production was 22,941.80 ton, with the broad of area of 2,331.02 Ha. The utilization of isopropyl aminoglyphosate 768 litres, the utilization of pesticide per hectare was 0.16; the utilization of active material per hectare was 0.03, the toxicity of pesticide LD50 0,01 ppm.

Company presented written documents to prove that the utilization of agro-chemical material has been inline with the targetted species and dosage, such as:

Company has the MSDS (Material Safety Data Sheet) for each and every type of agro-chemical material (pesticide), which explains the direction, storage recommendation and the handling of material in case of incident (first aid effort), identification of hazard, leakage preventive and management, PPE, physical character and chemical character of the material and so forth.

Based on field visit to Block Spraying System (BSS) warehouse, MSDS has installed surround the work place of spraying personnel. For instance at BSS house, BSS car unit.

Company refers to recommendation to use the dosage of pesticide, which is installed in each type of pesticide package, including the recommended dosage that stated in company's budget for pesticide usage.

There is a sign of prohibition to use herbicide near riparian area, such as in a cross yellow paint or cross red paint.

PT Tunggal Mitra Plantation has a regulation about type of working tools and dosage, target species, the application of rotation and so forth, which is stated in estate's budget document (the entire estate within PT Tunggal Mitra Plantation uses this document). For instance:

Circle weeding, by using herbicide with an active isopropyl amino glyphosate with a dose of 0.250 ltr/Ha should be applied 3 times in a year. In company uses an additional material, such as fluoroksifir, the recommended dosage is 0.06 gr/Ha.

Weeding spot, by using an active triklofir with a dose of 0.3 liter/Ha, methyl metsulfuron 0.35 gr/Ha, isopropyl amino glyphosate 0.5 ltr/Ha, should be applied 2 times a year.

The application of insecticide, for instance an active deltametrin material with a recommended dosage of 0.20 gram/liters should be applied for 2 times a year.

Based on interview with spraying supervisor at Block H08 Division 3 Manggala 3 Estate and at Block J01/J47 Division 1 Manggala 2 Estate on beetle management with an additional material, Decis 25 EC (with an active Cypermethrin). The recommended dosage is 100 cc/Kep.

Company has consistently implemented the policy to stop the utilization of paraquate. This policy is documented in below memorandum:

Memorandum from Head Plantation Operation to Senior GM and GM on the entire estate area regarding the prohibition to use herbicide with an active paraquat material and the permission to finish the remaining stock. Memo No. POD-UM-127/X/2008 on 4th November 2008;

Memorandum No. MGE 2/022/II/09/M on 15th February 2009 regarding to termination of paraquate utilization in MGE-2;

Memorandum No. MGE 3/025 / II/09/M on 14th February 2009 regarding to termination of paraquate utilization in MGE-3.

The entire policies have been implemented in the field. The evidence that paraquate has not been utilized in the field can be seen from central chemical warehouse card and the stock of paraquate in Agrochemical warehouse in Manggala 2 Estate and Manggala 3 Estate, as well as type of pesticide, which is included in the type of WHO class 1A and 1B. Subsequently, it can be summarised that company has been consistently did not use the agro-chemical materials, which are listed in the list of WHO class 1A or 1B and Paraquate.

The management unit has consistently delivered training for spraying personnel. For instance, training on 07th March 2015 regarding the appropriate chemist procedure for spraying personnel in Division I Manggala 2 Estate. The Assistant of Division I, supervisor I, and Chemist supervisor were in charge as trainers on this training. Based on field observation on spraying activity at Block J01/J47 Division 1 Manggala 2 Estate and at Block H08 Division 3 Manggala 3 Estate, it is known that personnel were wear PPR, such as mask, spectacles, apron, fibre and rubber gloves and safety shoes. Moreover, interview with personnel also revealed that spraying personnel have understood the safe work procedure, such as not to pour poison into knap sack, the procedure to spray the end of the nozzle that should not be exceeding the height of adult wrist, the used-packages should be put back into the warehouse of hazardous material, spraying should not against the direction of wind blow, and before start to work personnel must wear PPE. In addition, spraying personnel have understood the MSDS that provides the information about the danger of chemical material and the mechanism to handle incident in case of chemical poisoning.

Company has stored the entire pesticide in agro-chemical warehouse in each estate. This can be proved based on the observation in agro-chemical warehouse in Manggala 2 and Manggala 3 Estate. The warehouse is build in a permanent concrete, MSDS is available for the entire hazardous material, the hazardous wastes symbol has been well-installed, air ventilation is well-functioning, emergency wash and Fire Extinguisher are available in front of the warehouse. The entire used-pesticide package have been stored in temporary hazardous waste landfill and transported by the licensed hazardous waste transporter. Moreover, the hazardous waste is guaranteed not to be re-used for other purpose such as water container and so forth. Based on document's review, its known that the generated agro-chemical waste has been handed over to the temporary hazardous waste landfill in mill. This temporary hazardous waste landfill has a license from Head of Environment Agency in Rokan Hilir District; in a form of decree No. 21/BPDL/2010 dated 12th October 2010. Cover letter for transporting hazardous waste No. 08/MGE-3/VIII/2015 on 25th Augustus 2015 from Manggala 3 Estate that has been handed to Manggala Mill, with detail of used-packages such as metaprima 124 bottles, used-decis 3 cans, used-kenlon 5 cans, used-bravo 180 pcs.

Based on observation over spraying activities atBlock J01/J47 Division 1 Manggala 2 Estate and at Block H08 Division 3 Manggala 3 Estate, its known that personnel has implemented the safety work procedure, such as the proper mechanism to pour poison into knap sack, the procedure to spray the end of the nozzle that should not be exceeding the height of adult wrist, the used-packages should be put back into the warehouse of hazardous material, spraying should not against the direction of wind blow, and before star to work personnel must wear PPE. The practice of safety work procedure has been consistently conducted and the objective of the utilization of PPE for spraying personnel is to minimize the risk and negative impact. Company has applied pesticide from air. Spraying personnel conduct the application of pesticide by using the knapsack spraying tools.

Company delivered training for spraying personnel in order to maintain skill and knowledge of personnel regarding to the proper management of pesticide. For instance, training on proper spraying on 07th March 2015 spraying personnel in Division I Manggala 2 Estate that was delivered by assistant Division I, supervisor I and Chemist supervisor. Training covers the proper mechanism to pour poison into knap sack, the procedure to spray the end of the nozzle that should not be exceeding the height of adult wrist, the used-packages should be put back into the warehouse of hazardous material, spraying should not against the direction of wind blow, and before star to work personnel must wear PPE (shoes, mask, helmet, gloves and spectacles).From the aforementioned explanation from the management, it's known that there was no smallholder within the operational area of PT Tunggal Mitra Plantation.

Company has a procedure to manage hazardous waste, which is stated indocument RSPO/5.3/PLB3&BB3. The SOP explains the mechanism to manage used-pesticide packages. Observation on used-pesticide packages warehouse in Manggala 2 and Manggala 3 Estate and interview with warehouse personnel shows that the warehouse is used as a temporary collection place before the material being send to licensed temporary hazardous warehouse in Manggala mill area. The hazardous material in this warehouse will be kept for 90 days at the latest before transported by the licensed hazardous waste collector (CV Amindy Barokah). The transportation of hazardous waste (used-pesticide packages) by CV Amindy Barokah on 01st July 2015 amount 386 kg (the manifest of hazardous waste No. BC 0006735) with a transportation license No. 120007432BB-0009 for vehicle with plat number BK 9552 MN. Based on the aforementioned explanation, it can be summarised that company has conducted the proper waste disposal based on the existing procedure. Moreover, the appointed personnel have understood the procedure.

There is a specific annual medical examination for pesticide operator, which has been periodically implemented by company in collaboration with Cahaya Medical laboratory. The medical examination covers the examination over cholinesterase andspirometer. The medical examination results are well recorded in recapitulation and evaluation over medical issue of each personnel. Moreover, company also present the follow upaction over the evaluation result. Medical examination result in June 2015 showed that there were 2 spraying personnel who have the cholinesterase level above the standard threshold, and the physician recommended the personnel to take further examination to disease specialist in Indah State hospital in September 2015. Based on the aforementioned explanation, then auditors will observe the follow up of this issue on the next surveillance.

Interview with spraying personnel at Block E02 Division 4 Manggala 2 Estate and at Block H08 Division 3 Manggala 3 Estate, revealed that neither pregnant nor lactating spraying personnel, moreover, personnel understood the prohibition of pregnant and lactating personnel to work with chemical material.

Status: Comply

4.7

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

Company has consistently documented the implementation of occupational health and safety policy, occupational health and safety procedures, and occupational health and safety plan that cover the entire operational activities that stated in guiding committee of occupational health and safety work plan. The available occupational health and safety is presented in a easy to understand language, has been approved by Top Management (Head Plantation Upstream Indonesia in December 2011), which was part of company's commitment to provide and maintain safety and healthy work environment by implementing an effective management to prevent work accident, ensure the safety of contractor and visitors. This policy has been communicated to personnel through morning briefing activities before the work start. The explained occupational health and safety plan in guiding committee of occupational health and safety has been drafted each year. For instance in 2015-2016 consists of guiding committee of occupational health and safety's meeting, the commemoration of national occupational health and safety, ESH Assessment, disposal and maintenance over occupational health and safety symbols, medical examination for high-risk personnel, socialization of SOP and HIRAC, safety briefing, the examination over PPE and training on fire extinguisher.

Company has a commitment to examine the entire operational activities that might cause personnel health and safety. This commitment can be seen from the existing *Hazard Identification Risk Assessment and Risk Control* (HIRAC) document. HIRAC for mill's operation and estate has been revised each year. The HIRAC drafting refers to SOP for occupational health and safety identification, assessment and hazard control/Hazard Identification Risk Assessment and Risk Control (No. Policy 7301/PSQM-ESH/11) set on 07th July 2011. Based on field observation in mill and estate operation area, company has implemented the risk management in accordance with the identification over the possible risk. For instance field observation in Manggala Mill especially in station engine room with noise hazard, the management that has been taken by company such as by installing signboard and mandatory utilization of PPE, medical examination particularly audiometric and the proficiency of PPE (*earmuff*).

The management unit has delivered training on safe work procedure through safety briefing activity on 29th January 2015 that delivered to harvesting, spraying and fertilization personnel in Lembiru Estate and Awatan Estate. Safety briefing emphasized the importance of PPE utilization, understanding over risk and work hazard, safe work practices. Moreover, on 13rd February 2014, company also conducted LC training and *lining terrace* for manager, staff and supervisor. The management unit based on HIRAC assessment has provided PPE. For instance the proficiency of PPE for spraying personnel such as apron, mask, spectacles, AP boots, hat, rubber gloves.

The entire personnel that involve in company's operation have received training on safe work procedure. For instance on 07th March 2015 there was a training on proper chemist for spraying personnel in Division I Manggala 2 Estate that was delivered by Assistant Division I, Supervisor I and Chemist Supervisor. Meanwhile the training material has presented the proper mechanism to pour poison into knap sack, the procedure to spray the end of the nozzle that should not be exceeding the height of adult wrist, the used-packages should be put back into the warehouse of hazardous material, spraying should not against the direction of wind blow, and before start to work personnel must wear PPE. Moreover, company has provided sufficient PPE for the entire personnel particularly the one with high-risk work, such as pesticide personnel, machinery operator in mill, replanting personnel, and harvesting personnel. For instance, the observation and interview result over spraying activity at Block E02 Division 4 Manggala 2 Estate and at Block H08 Division 3 Manggala 3 Estate, it's known that the spraying personnel have understood the safe work procedure and they wore PPE such as boots, spectacles, mask, helmet, gloves, and apron.

Based on periodic medical examination in June 2014, there were personnel that have hearing impairment. However, lack of evidence that company has taken follow-up actions regarding this matter in order to protect its personnel from the negative impact of operation activity. **Non-compliance No.2014.05**

Observation on 02nd September 2015

Company presents further medical examination for 4 personnel that have medical problem, which was conducted in Agung Rokan Hilir Hospital on 19th September 2014, with a recommendation that 1 personnel should be transferred to easier work.

Guiding committee of occupational health and safety is a committee in charge to ensure the implementation of occupational health and safety within mill and estate operational activities. Moreover the committee has a responsibility to conduct the monthly meeting of guiding committee of occupational health and safety, for instance, guiding committee of occupational health and safety meeting in Manggala 2 Estate on 22nd June 2015 with an agenda to discuss the recapitulation and evaluation over work accidents, PPE examination, and the hygiene of work environment. Additionally, company has consistently reports guiding committee of occupational health and safety's activities every 3 months to Social, Manpower and Transmigration Agency in Rokan Hilir District (guiding committee of occupational health and safety's report in Manggala-3 Estate for period January – March has been sent on 25th April 2015 and report from April to June has been sent on 19th August 2015. Hence, **Non-compliance**

2014.05 has been fulfilled.

Company has consistently provided the procedures for work accident and emergency, which are completed with instruction in a common language that easily understood by personnel. For instance the SOP for fire emergency response (document 5.5.3 PK, revised in October 2011), meanwhile the procedure for handling work accident is stated in RSPO/4.7/KKM and RSPO/4.7/KKS. The implementation of preparedness and emergency response has been consistently became the priority of company. This can be seen from the established-emergency response team in mill and Estate, with team members who already received fire emergency response, fire simulation, patrol over the hot spot areas, socialization on zero burning approach, proficiency of fire extinguisher and fire tower.

Company has delivered training on first aid for personnel who work in company's operation activities. Based on interview with harvesting supervisor at Block E02 Division 4 Manggala 2 Estate and Block Y17 Division 4 Manggala 3 Estate, its known that supervisor brings first aid kits when he works in the field. Moreover, supervisor has received first aid training and has understood the mechanism for first aid.

PT Tunggal Mitra Plantation provides work accident insurance for its personnel, which is registered in manpower-social insurance (*BPJS Ketenagakerjaan*). Based on observation over the monthly membership cost and number of membership, its known that the entire personnel within PT Tunggal Mitra Plantation has been registered in manpower-social insurance (*BPJS Ketenagakerjaan*) and company has periodically pay the membership cost every month based on the applicable regulation.

The management unit showed the recapitulation of Lost Time Incident calculation – Frequent Rate (LTI-FR) for mill and estate unit for period July 2014 – June 2015. The recapitulation informed number of working hours, number of work incident, number of lost-day and LTI-FR year to date

Status: Comply

4.8

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

Company has recorded the entire annual training program for its mill and estate's personnel, based on their competency and position. Company has training calendar for staff, training program and capacity building program for personnel. For instance the scheduled-training such as palm oil harvesting technical, which has been planned in July, plantation maintenance in September, fertilization in Augustus, spraying technical in November and FFB's grading in November.

Company stored and maintained the record of the trainings. Moreover, company presented the record over training implementation including the training for staff and supervisor.

Company has consistently committed to hire well-trained contractor. Company set the criteria of contractor that entitle to work for PT Tunggal Mitra Plantation. Moreover, as a requirement for the recruitment, contractor should attach the work experience or expertise license during the tender process. PT TMP showed SOP for Tender No. Policy:312/PUR, where in article II clause 8 stated that there is a pre-qualification for each contractor and suppliers who want to follow the tender process, such as contractor legal certificate, financial report, performance bond, down payment, bank reference and other supporting documents. Company also should attach the requirement for criteria that is stated in work agreement between company and contractor.

Status: Comply

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

5.1

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

As part of effort and commitment toward sustainable development and environmental friendly, PT TMP has completed its environment documents, such as:

Environment Impact Assessment of PT Tunggal Mitra Plantation that has been approved by Agriculture Minister based on Decree No. RC. 220/950/B/V/1994 on 28th May 1994 regarding the approval on environment impact assessment of PT Tunggal Mitra Plantation. The scope of study on this document covers an area of 18,000 Ha and mill with capacity about 60 ton FFB/Hours (the mill is under construction process).

The administration division of agriculture department with a decree NO. 001/RKL-RPL/BA/VI/94 on 24th June 1994 has approved environment management report/environment monitoring report of PT Tunggal Mitra Plantation.

The revision over Environment management report/environment monitoring report has been approved by Head of Local Environment Management agency in Rokan Hilir District, based on Decree No. 666.1/AMDAL-BAPEDALDA/2006/12 on 23rd

Augustus 2006 regarding the approval on Environment management report and environment monitoring report. Estate and mill's activities report in PT Tunggal Mitra Plantation of Rokan Hilir District, Riau Province. This scope of environment management and environment monitoring covers an area of 13,836 Ha and mill with a capacity of 60 Ton FFB/Hour. Company can present the schedule for environment management and environment monitoring activities, which are stated in environment management report and environment monitoring report. At the moment, there is no pra-construction activity because the entire estate area has been planted. Subsequently, PT TMP has been being in replanting stage in order to replace the un-productive plants. Concomitantly, company is under the construction and post-construction stage. Company has an organization to perform environment management and environment monitoring activities.

PT TMP has periodically conducting the environment management activity and environment monitoring activity as well as has drafting the environment management report and environment monitoring report. These reports have been sent to Local Environment Agency in Rokan Hilir District, Riau province.

the measured and managed parameters in the environment management report and environment monitoring report such as: erosion and sedimentation, the quality of air and noise, the quality of river's water, the quality of liquid and solid waste, the potency of field fire, the destruction over natural vegetation and wildlife, the destruction on road access, the decrease of environment quality and other social impacts due to replanting activity.

Based on information from company, the environment document is still adequate to be use in present time and there is no need for revision

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

PT TMP has conducted study and identification on **High Conservation Value (HCV)** that has been drafted in HCV identification report by POLLITO consultant on 9th Nov – 16th Nov 2009.

Based on HCV identification result, PT TMP has various HCV areas or HCV potential area, such as riparian area of Bangko River (Manggala II, Block A35, A36, A37, and A38, A39, A40, A42, A43, A44 and Manggala I, Block A33, A34) for HCV 1.1, 1.2, 1.3 and 1.4), wildlife habitat (Manggala II Block G52, G53, G54, G55) for HCV potential 1.1, 1.2, 1.3 and 1.4), wildlife corridor (Manggala II Block E39, F39, I39, H40, I40) for HCV potential 1.4 and Buffer Zone for natural forest for HCV potential 1.1, 1.2, 1.3 and 1.4). Broad of HCV and the entire HCV potential = 345.76 Ha.

The HCV document identifies type of protected wildlife based on Law, IUCN and CITES; mammal: 7 types (for instance *Lutung*, *Siamang*, *Kucing akar*, *Trenggiling* and so forth), Aves: 14 types (such as *Cangak merah*, *Elang Tikus* and so forth), Reptile: 4 types (*Kuya Batok*, *Biawak* and so forth).

Based on the identified condition, PT TMP has established and planned the HCV management program for Bangko's riparian area (Area HCV 1.1), Manggala II with a broad of 14.32 Ha. This program covers:

The marking between HCV boundary area and other areas within the estate.

Cleaning the boundary between HCV area and other areas within the estate

Socializing the location of HCV to the entire personnel and students by distributing posters, brochure, leaflet and so forth.

Cultivating the HCV area with a particular river plantation

Establishing information board that points the location of HCV A and the urge to protect the area.

Conducting monitoring over wildlife

Arranging the HCV area as one of special area for recreational destination

Conducting nursery for plantation enrichment in HCV area

Monitoring plan, such as:

Conducting monitoring over boundaries

Socializing the planted plantation

Conducting periodic patrol every month.

PT TMP has conducted several monitoring activities, such as:

Identification over protected wildlife, which located in HCV area of Estate Manggala 1 HCV 1.1 and block Div MGE-1/A01

Identification over protected-wildlife, which located in HCV 1.1 at Division IV MGE-2/A01.

Identification over protected wildlife, which located in the area of Division II MGE- 02 (potential HCV for wildlife Habitat) 1.1; 1.2; 1.3; 1.4.

Identification over protected wildlife, which located in area of Division II Block F02 (potential corridor for wildlife) HCV 1.4. PT TMP has appointed the officer in charge to monitor the HCV area, including:
Manggala Estate 2; Mr. Wahyudin (Supervisor in Division 2) based on Decree from Estate Manager No. MGE-2/ist-HCV/II/2010/S on 01st February 2010 regarding the appointment of personnel in charge to monitor the HCV area.
Manggala Estate 1; Mr. Lamsihar Silaban (Supervisor in Division 4) based on Decree from Estate Manager No. MGE-1/HCV/II/2010/S on 01st February 2010 regarding the appointment of personnel in charge to monitor the HCV area.

PT TMP could not present the existing regular program to educate personnel related to the status of RTE species and could not present the disciplinary actions toward the perpetrator who catch, hurt, collect, and kill wildlife species/RTE. NCR 2015.02 Minor 5.2.3

Based on field observation, the HCV area showed that neither palm oil cultivation nor cutting and the area was left naturally. Along the riparian area of Bangko River, the auditor found the fish catching activities by local communities by installing net or using manual bait. This finding showed that there is an agreement between local communities and company to protect and utilise the area by keep sustaining its ecological function. The potential HCV area also occupied by local communities, which means that there is an agreement between local communities and company to protect and utilise the area by keep sustaining the ecological function of the area as the habitat for wildlife and maintain its function to provide land for communities to cultivate rubber plantation.

5.2.3 Status: NCR 2015.02 with category Minor

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

PT Tunggal Mitra Plantation has the document of waste' source identification and management plan. This document explains about:

Source of waste (Domestic, Mill, Estate, Clinic)

Type of waste (solid, liquid)

Classification of waste (hazardous and non-hazardous)

Unit (kg, litre, pieces, ton, can)

Objective (final landfill, hazardous waste warehouse, warehouse, land application, boiler, partnership hospital)

There is also a document that identifies the pollution and emission within PT Tunggal Mitra Plantation, that explains:

Categories (air pollution, emission, noise, water and soil pollution)

Source (chimney for boiler's smoke, chimney for generator, turbine, generator, the vibration from machine, oil leakage)

Location (Mill & Estate)

Controlling.

PT TMP has a commitment to manage the chemical material and its packages as part of hazardous waste and refer to hazardous waste plan and direction for disposing waste as stated in: SOP for hazardous waste management and non-hazardous waste management (PLB3 and BB3 revision 1 in 2012) that has been approved by company's management. This SOP consists of the acceptance procedure for Hazardous waste, the storage of hazardous waste, the mechanism to reduce the hazardous waste and non-hazardous waste.

Direction to dispose the agro-chemical waste and its used-packages.

License for temporary storage came from Environment Management Agency of Rokan Hilir District with a letter number 21/BPDL/2010 in 2010 that was set on 12th October 2010 and this license will be expired on 12th October 2015. The scope of this license is PTTMP mill with the pointed coordinate and measurement, while the source of hazardous waste came from PT TMP's operational activities.

PT TMP has handed the hazardous waste in a form of used-packaged that is contaminated with hazardous material to licensed contractor, which is CV Amindy Barokah. Company can present the document of hazardous waste in a form of manifest number 0006735, which contains 386 kg of contaminated-packages.

Based on observation in hazardous waste warehouse in Manggala Mill, the audit team considered the warehouse was inline with the license and company has recorded and monitored the hazardous waste balance, including the incoming and out-going chemical packages. The used-chemical packages, used-spraying tools are separately stored. There was a retaining wall that separates the two rooms. This is to ensure that there will be no mix between different hazardous waste.

Company has SOP for hazardous waste management and non-hazardous waste management. This SOP called PLB3 document and BB3 revision 1 in 2012 that has been approved by estate manager.

Company can present the instruction for managing domestic waste that inline with memorandum from PSQM No 009/PSQM-

<p>UM/X/2011.</p> <p>Waste management plan has been provided and stated in the document of palm oil waste management activities PT.TMP, for instance: for the hazardous waste (used oil), medical waste, solid waste (empty bunches, fibre, shell), liquid waste and used-fertilizer or used-chemical packages.</p> <p>PT TMP has a collaboration with licensed hazardous collector, which is CV Amindy Barokah and Indah Bagan Hospital in Batu Riau. During the audit, company had delivered hazardous waste. Minutes of handover dated 01st July 2015 to CV Amindy Barokah Medan was completed with manifest such as:</p> <p>Manifest:</p> <p>ZF 0006732, used-oil amount 1200 ltr</p> <p>ZF 0006733, used-filteramount 66 kg</p> <p>ZF 0006734, used-majunamount 7 kg</p> <p>ZF 0006735, contaminated-packages 386 kg</p>											
Status: Comply											
<p>5.4</p> <p>Efficiency of fossil fuel use and the use of renewable energy is optimised.</p>											
<p>Based on calculation over the efficiency on fossil fuel utilization for operating the turbine - in form of monitoring recapitulation over diesel fuel utilization in 2015 to processes 84.629 Kg FFB– company needs diesel fuel amount 279.840 litreif company will use turbine.In fact, company only use diesel fuel amount 221.995 litres when using turbine. Subsequently, there is a saving of diesel fuel amount 57.845 litreor 20.67 %.</p> <p>Company presents the recapitulation of fibre and shell utilization to support the operational of mill for period July 2014 to June 2015. For instance, in June 2015, to generate 3,044 ton CPO, 35.02 %, it requires energy from fibre and shell utilization and the remaining of 64,8 % needs diesel fuel. Meanwhile the required time to process FFB to generate 3,044 ton CPO will need 907.51 hours. From this data, the ratio of fibre and shell utilization against CPO is about 0.84 and efficiency on renewable energy utilization is amount 44.34 % from turbine operation by using boiler, fibre and shell in the process</p>											
Status: Comply											
<p>5.5</p> <p>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.</p>											
<p>PT Tunggal Mitra Plantation has a mechanism for land preparation that is stated in SOP of Manual ReferenceAgronomyChapter 4 regarding Land Preparation. This SOP explains that company is not allowed to use fire for land preparation, both for replanting and for land preparation.Based on field visit to block H02 Manggala 2 Estate, there was no indication of fire and field condition indicated that the replanting was conducted with a <i>zero burning</i> method.</p>											
Status: Comply											
<p>5.6</p> <p>Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.</p>											
<p>PT Tunggal Mitra Plantation has identified the sources of pollution and emission in Manggala mill. This identification covers aspects, such as:</p> <p>Air (boiler chimney 1,2,3 and generator chimney 1,2,3)</p> <p>Noise (press station, nut, kernel, boiler, and machine room)</p> <p>Vibration (press station, nut, kernel, boiler, and machine room)</p> <p>Smell (waste management station /anaerobic pond)</p> <p>Identification over the source of pollution in Manggala Mill</p>											
<table border="1"> <thead> <tr> <th>Category</th><th>Description</th><th>Source</th><th>Management/ Control Mechanism</th></tr> </thead> <tbody> <tr> <td>Air pollution and emission</td><td>Chemney boiler Knalpot generator</td><td>Boiler Generator</td><td>Installing smoke density meter Cleaning furnace periodically Preventive maintenance on dust collector Cultivating protecting-vegetation Using mask</td></tr> </tbody> </table>				Category	Description	Source	Management/ Control Mechanism	Air pollution and emission	Chemney boiler Knalpot generator	Boiler Generator	Installing smoke density meter Cleaning furnace periodically Preventive maintenance on dust collector Cultivating protecting-vegetation Using mask
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Noise	Sound from machine	Turbine Generator Sterilizer	Installing separation shelf for the room Installing sound-proof on disposal canal Wearing ear-plug
Air pollution and soil	Oil leakage Oil spill over Chemical leakage	Machine	Installing spillery Installing retaining wall Installing oil trap Control wood's flour

Identification over the source of emission and pollution in Manggala Mill

Source of pollution and emission	type of pollution and emission	Remarks
Operation	Air and noise	The decrease on air's quality due to mill's operation through the chimney of boiler's emission, and generator's emission (CO, NO, SO) as well as machine room that produces noise.
Operation	Air and noise	Source of energy in the estate comes from generator. Subsequently there is a decrease on air quality due to generator operation that produces particulate of dust and noise.
Transporting CPO	Air	The generated type of impact such as the decrease of air's quality especially during dry season as well as gas emission from vehicle (CO, NO).
Utilization	Air	The decrease on air's quality due to the utilization of liquid waste that generates smell.

Company has measured and monitored the air's emission from boilers' chimney by using the service from third party, which is the laboratory of environment's quality evaluation (BINALAB) every 6 month, for boiler no 3, meanwhile boiler no 1 is broken (not being used) and boiler no 2 is in standby position. *Smoke density meter* operates in boiler No.3. The examined-parameters such as particulate, sulfuredioxide (SO₂), Nitrogen Dioxide (NO₂), Hydrogen Chloride (HCl) and so forth. The evaluation result shows the examined parameters were under the standard threshold.

Laboratory analysis over air's quality from generator 1 and 2 emission in PT TMP Mill on 26th March 2014 and in 2015 semester I, the entire parameters were under the standard threshold of Ministry of Environment No. Kep-13/MENLH/III/1995, attachment V-Band Kepdal No. KEP-205/BAPEDAL/07/1996, attachment III chimney's requirements.

the analysis result over air ambient in 2014 and 2015 for the entire parameters showed that they were under the standard threshold of KEP-48/MENLH/VI/1995 regarding the standard quality for environment and residence, which also based on Government Decree No.41 in 1999 regarding the quality of air's ambient and residence environment amount 55 dBA where the noise level before and after mill's operation are under the standard threshold.

the measurement result over air quality in working room for the parameters set by PERMENAKER No.13/MEN/X/2001. The standard threshold for noise refers to SKMENAKER No. KEP-51/MEN/1999, and vibration threshold refers to Ministry of Environment Decree No. KEP-49/MENLH/XI/1996

PT TMP has a plan and effort to reduce pollution and emission, such as:

During morning briefing, before work get started, company will socialise the importance of PPE's utilization and work safety.

The application of empty fruit bunches for part of fertilization activities in estate.

Cleaning the dust boiler every week in fire grade, dust collector and chimney

Examination over air's pollution and noise every 6 months by the third party and the result will be submitted to related agencies.

Sedimentation method for 90 days and 10 ponds (Deoling pond, Cooling Pond, anaerobic pond, mixing pond, aeration pond) for liquid waste that is generated by mill and *Land Application*.

The operationalization of mill should be based on the existing SOP and conducted by process's assistant.

PT TMP has taken various efforts to reduce pollution and emission, including glasshouse effect based on the plan and described these efforts in company's environment management plan and environment monitoring plan. Periodic activities such as examination over air's emission and air's ambient analyse and set the management activities as being reported every semester to related-agencies. The examination is conducted in collaboration with accredited laboratory in order to ensure the examination tools are precise and correct.

Some implementation documents over company's environment management plan and environment monitoring plan have been verified and reported to local environment agency of Rokan Hilir District, Environment Agency in Riau Province and KLH cq ASDEP for managing the agro-chemical's pollution, which was completed with submission receipt.

The managed and monitored parameters have been reported in company's environment management plan and environment monitoring plan, which are related to the quality of air and noise, as well as the decrease of environment health

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.

PT Tunggal Mitra Plantation has some documents, which describe the social impact analysis, such as:

Environment impact analysis of PT Tunggal Mitra Plantation that has been endorsed by Agriculture Ministry based on Ministry of Agriculture Decree No. RC. 220/950/B/V/1994 on 28th May 1994 regarding the approval on environment impact assessment of PT Tunggal Mitra Plantation. The scope of this document covers the areal of 18,000 Ha with mill's capacity amount 60 ton FFB/Hours.

The Social Impact Assessment (SIA) report has been drafted by consultant (Pollito) in January 2010.

Document's review on Replanting impact toward environment and social of PT Tunggal Mitra Plantation, Estate Manggala 1, 2 and 3 in Rokan Hilir District, Riau Province. This review was conducted by Aksenta consultant (Jakarta) in January 2012. This review highlighted the stage of replanting and indication over replanting impact on environment and social condition on estate's surrounding. The objective of this review was to identify the environment and social impact, the activities that generate those impacts, components and affected stakeholders, option for mitigation the social and environment impacts. Moreover, the impact from replanting activities also stated in environment management plan and environment monitoring plan of Semester I in 2015 (Period January - June 2015).

Company presented the evidence records such as visit book from Pollito team in a form of list of attendance and the minutes of data collections from surrounding villages from 9th November to 20th November 2010.

There is a document of environment management plan and environment monitoring plan of PT TMP for semester 2 in 2014, Period July – December 2014 and period January – June 2015, as well as the monitoring record over social impacts (questioners, analysis result and the management program for social impact), however, lack of evidence on the participatory approach on developing the plan, such as by involving the most affected groups. **NCR 2015.03, 6.1.3 Major**

Auditor's observation

15th October 2015

Some curative actions, such as:

The social impact management programs of PT Tunggal Mitra Plantation, Period 2015 – 2016 (the document is signed by head of villages near the operation area of PT TMP) The questioner's analysis result Questioner's hand over evidence to related villages.

Based on the aforementioned curative actions, then the non-compliance has been fulfilled and closed.

Status: Comply

6.2

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

PT TMP has a procedure for communication and consultation with local communities, such as SOP communication/consultation (RSPO/6.2/KKM) that has been revised on 25th July 2011. This procedure presents the guideline for communication and consultation with local communities and completed with an attachment such as the *flow chart* of the process. The SOP explains that in case company needs to inform local communities, then the manager needs to send letter through head of villages. Based on interview with the management and document's review over job description in company, it is known that communication with local communities is a responsibility of each estate manager and he/she will be assisted by assistant and head of division (administration). The appointed head of divisional 1st Augustus 2015 with Decree from chairman SOU-16 such as:

Beni A. Tarigan (Head of Section Manggala 1 Estate),

Julianto (Head of Section Manggala 2 Estate)

Ade Zulfachry (Head of Section Manggala 3 Estate)

Amril Ritonga (Head of Section MGF)

There is also a list of Stakeholder in PT Tunggal Mitra Plantation Manggala 3 estate for 2014 – 2015 and company activities' record, such as:

Meeting between TMP staff and officer from Pujud Sub-district on 18th February 2015

Collaborative training for fire extinguisher team of PT TMP that can be proved by the existing photos and attendance sheet of 88 participants.

Company has a procedure for communication and consultation with local communities, that stated in SOP communication/consultation (RSPO/6.2/KKM) that has been revised on 25th July 2011, moreover company has appointed person in charge to do the communication and consultation with local communities.

PT Tunggal Mitra Plantation has the SOP for complain mechanism RSPO/6.3/PKM Revised 1 on 25th July 2011 that has been completed with flow chart for complain mechanism. Community's complain should be submitted in a written to unit manager through the administration unit. In 2015 until August, based on complain log book and interview with unit management, there was no complain from local communities. Based on public consultation in Siarang - Arang Village and Sidomulyo village, and consultation with related agencies in Rokan Hilir District (local environmental management agency, social and manpower agency, plantation agency, forestry agency and national land agency) there was no indication of complains from related stakeholders due to mill and estate's operation in PT TMP

Status: Comply

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

PT Tunggal Mitra Plantation already have a community of RSPO Grievance SOP / 6.3 / PKM Revision 1 dated July 25, 2011, equipped with a flow chart for handling complaints. Public complaints submitted in writing to the manager unit through the chief of administration. Throughout 2015 until August based on public complaints log book and interviews with management unit, that there were no reports of complaints from the parties.

Based on the results of the consultation in the Village Plantation rerunning - Charcoal and Sidomulyo Village, as well as consultations with relevant agencies in Rokan Hilir (bapedalda, Dinas Sosial and Employment, Department of Plantations, Forest Service and the National Land Agency) is not indicated for the complaints-complaints of the parties to the action operational plantation and palm oil mill PT TMP.

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.**

PT TMP has a procedure that regulates the compensation or land right compensation based on social policy of Minamas Plantation, which stated in sustainable estate management No. Policy: 724/TQEM-SPMS/09, Rev.00, on 27th Augustus 2010 page 13 point 3: Plantation Upstream Indonesia guarantees that the legal agreement over land compensation has been carried out in written that ensure local communities and other related stakeholders to mention their opinion through their own representative organization. There is also a procedure for land occupation clearing No. 343/PSD-OKUP/11. The land occupation clearing should be based on final occupation master map that consists of information of the identification result over land occupation by attaching photos of the land occupation area based on GPS measurement and technical suitability survey. Plantation Services-Region manager and Estate manager are in charge to conduct the negotiation over land occupation clearing

with the owner and this process should be witnessed by local government and other related parties. Land compensation also should be completed with minutes of meeting, which consists of information about the broad of the area, soil condition, land right and the compensation cost, payment receipt, realization report over the land paymen and witnessess ffrom related-parties. until the present re-certification audit, PT Tunggal Mitra Plantation does not conduct any land clearing nor conducts any land compensation process. The land compensation process has been done n the past and it is well documented in a form of land compensation document dated 21st Augustus 1991 that covers and area of 236.40 in Siarang-Arang Village, Tanah Putih Sub-district, Bengkalis District and land compensation in 1997 that covers an area of 301,609 Hain Tanah Putih Sub-district, Bengkalis District

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.

PT Tunggal Mitra Plantation pays it personnel's salary based on the applicable standard minimum wage. There is a Riau Governor Decree No 244/III/2015 regarding the minimum wage for palm oil and rubber agriculture/ plantation sub-sector for Riau Province in 2015, which is IDR. 2,125,500,- per month. Company has a memorandum, which was issued by the management unit from HRM's general manager with number 182/HRM-i3/IV/2015 on 08th April 2015 regarding the daily and montly SKU salary in the estate in 2015 for PT AIP, PT TMP, PT LTS and PT BNS based on Riau Governor Decree number Kpts. 244/III/2015 on standard minimum wage for plantation sub-sector with GAPKI and worker unions of plantation and agriculture sector in Riau Province on 25th February 2015 that has been agreed amount IDR. 2,000,025,- plus rice allowance. Compnay has paid its personnel based on the applicable regulation and inline with company's payment system. Based on interview with committee of agriculture and estate work unit in Manggala 2 and 3, its known that company has tried its best to comply the applicable regulation related to wage based on the agreement between GAPKI, BKS-PPS and worker union, which was 2,125,500,- (including allowance). PT TMP has a written and complete agreement with local contractor that explains the type of work, duration, timeline. Company has suggestion and sufficient facilities, education infrastructure, and clinic. There are 2 types of housing, such as G1 type and G2 permanent. G2 type is a one building that consists of two house (within one single roof, there is two doors). Meanwhile, G1 type is a single unit house (one roof one door). In addition, company has central medical clinic, which has a license from Ministry of Health. This clinic provides services such as providing first aid service for mild and medium type of accident, periodic medical examination once a year, first aid training for supervisor. However, when patient from central clinic requires a reference, then central clinic will recommend the Dumai and Indah Bagan Batu hospital. Company has education service and facilities, such as kindergarden, elementary school, junior high school, which are managed by company's teachers. For senior high school, company provides school bus, which will drop student from estate to senior high school location in Pujud Sub-district. Moreover, company also has sport facilities and infrastruture, such as volley ball yard, soccer field, and tennis field. Meanwhile for worship facilities, company provides mosque and church. PT TMP has monitored and improved the access to adequate food supply with a pocket-friendly cost by establishing worker's cooperative, which is Maju Bersama Jaya Cooperative that has been established based on Cooperative and Small Medium Enterprise Agency in Rokan Hilir District Decree number 362/BH/IV.6/II.IV/2014. The cooperative is located in Manggala 3 Estate and provides nine types of staple food. In addition, there is a special market, which only operated on Sunday and Thursday that located 4 km away from company's location. The market takes lace in Sukajadi Village (Manggala Sakti) which provides staple food. Moreover, company also provides transportation facilities to go to this market

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.

PT TMP has a commitment to provide freedom of workers to organize is described in the SOP in Sustainable Plantation Management Guideline No. Policy 724 / TQEM-SPMS / 09 dated 27/08/2010 Chapter Policies and Objectives Sub Chapter Plantation Upstream Indonesia Policy on Social Policy page 13 Point 5 stating that the company is expected to respect the rights of all employees to form and join a community States workers according to their choice and negotiate together. In addition to workers' freedom of association contained in the Collective Labor Agreement from 2014 to 2016.

The results of interviews with workers at Mangala 2 Estate, Manggal 3 Estate, Mangala Factory showed that there was no indication of prohibition for workers to gather and organize. .

There are the minutes of a meeting of trade unions within the company include:

- Meeting Invitation PUK SPSI Mangala 3 dated May 18, 2015 in the building of SDS Tunas Harapan MGE 3 discusses the Re

<ul style="list-style-type: none"> - structuring Management of replacement of the Chairman and Vice Chairman of the basic pension from the company. With Attendance List as many as 28 people were at Hadari from various divisions in MGE 3. ▪ Meeting II Submission of bipartite negotiations on the ladder August 1, 2015 which was attended by 29 people from Mangala 3 • Implementation Meeting of August 17, 2015 event was held at the House of Hope cottage Tunas SDS 2 	Status: Comply
6.7 Children are not employed or exploited.	
<p>PT TMP has a commitment to grant freedom to its personnel to establish and join worker union, which is stated in SOP for sustainable plantation management Policy No. 724/TQEM-SPMS/09 on 27/08/2010 Chapter: policy and objective, Sub-chapter: Plantation Upstream Indonesia Policy on social policy page 13 Point 5, which explains that company is expected to honour personnel's rights to establish and join worker union based on their own choice as well as to make a negotiation. In addition, the freedom to join and establish worker union also stated in work agreement of 2014 – 2016.</p> <p>Based on interview with personnel in Manggala 2 Estate, Manggal 3 Estate, Manggala Factory, it's known that there was no indication of prohibition of personnel to gather and to make negotiation.</p> <p>PT TMP has a policy regarding to minimum age, which is stated in work agreement in 2014 – 2016, particularly on article 16 point 1.2.2 that the minimum age for recruitment is at least 18 years old, or has married. Moreover, there is also an SOP for sustainable palm oil plantation management policy No. 724/TQEM-SPMS/09 that has been approved on 1st April 2010 by Chief Executive Officer, on chapter policy and objective, Sub-chapter Plantation Upstream Indonesia on social policy point 6 that emphasised Plantation Upstream Indonesia does not recruit children.</p> <p>based on document's review (personel main book) and interview with personnel in Manggala 2, Manggala 3 and Manggala Factory as well as field visit on some activities, there was no personnel under age.</p> <p>Company provides an opportunity and equal treatment to work in company. This issues is clearly stated in PT. TMP personnel main book. For instance, at MGE 2, MGE 3 and MGF the composition of personnel is vary and they all comes from different gender status (male or female), position, place and date of birth, ethnicity (Javanese, Batak, Malay, Sundanese) status (married/single) and religion.</p> <p>there is a recruitment policy that is stated in work agreement in 2014 – 2016 on chapter IV article 15, which explains the recruitment, placement, and mutation. The recruitment process, mutation and promotion are conducted by company based on work performance. Interview with personnel's representative (committee of bipartite LKS) revealed that there was no indication of discrimination among estate and mill's personnel</p>	
Status: Comply	
6.8 Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.	
<p>The Company provides opportunities and equal treatment in employment. This can be seen in the book of the parent PT. TMP is on MGE 2, 3 and MGF MGE listed sexes (male and female), job title, place / date of birth, ethnicity (Javanese, Batak, Malay, Sundanese), status (married / not) and religion. From the document it can be seen that the composition comprising employees from various ethnic backgrounds, religions and gender.</p> <p>Recruitment policy contained in the Collective Labor Agreement of 2014 - 2016 in Chapter IV Article 15 which describes the acceptance, of appointment, placement and redeployment of workers. The process of recruitment, transfer and promotion undertaken by the company, based on the results of the assessment of the performance of the employee concerned. The results of interviews with employee representatives (administrators of EMC) and some employees of gardens and plants are not indications of discrimination among workers.</p> <p>The Company provides opportunities and equal treatment in employment. This can be seen in the data book parent PT. TMP 2015 is on MGE 2, MGE 3 and MGF included gender (male and female), job title, place / date of birth, ethnicity (Javanese, Batak, Malay, Sundanese), status (married / not) and religion ,</p> <p>Recruitment policy contained in the Collective Labor Agreement in 2014 - 2016 which describes the relationship. On Chapter IV Article 15 which explains the acceptance, of appointment, placement and redeployment of workers. PKB years 2014 - 2016 Chapter IV Article 15 also describes the recruitment and promotion:</p> <ul style="list-style-type: none"> - The selection is done by the recruitment of workers by the employer according to specifications required position 	

<p>qualifications. Workers candidate Mandatory follows the procedures that will be implemented by employers.</p> <p>- General requirements that must be met in the recruitment of workers such as; Indonesian citizens; physically healthy and spirited; meet the criteria and requirements needed.</p> <p>There are examples of DSS based on a document review SPK-MGE number 3/0145 / VI / 2015 / S contained in Mangggala 3 which describes the local DSS to work Areal TBM.2 Manual Open disc.</p>	
	<p>Status: Comply</p>
<p>6.9</p> <p>There is no harassment or abuse in the work place, and reproductive rights are protected.</p> <p>Company has a policy to prevent sexual harassment that is stated in SOP for sustainable plantation management Policy No 724/TQEM-SPMS/09 on 27/08/2010 chapter policy and objective, sub-chapter Plantation Upstream Indonesia on social policy point 4 related to the development and implementation of policy in order to protect female worker from sexual harassment and protect their reproductive right. Moreover, company also has a work agreement 2014-2016, particularly on article 33that states:</p> <p>Female workers have a leave entitlement while they receive full payment 1.5 months before labor and 1.5 months after labour based on physician or midwives assessment. Moreover, for female worker who has an experience of miscarriage also entitle to take 1.5 months leave after the incident based on physician or midwives assessment.</p> <p>Company gives compensation for lactating worker in a form of break time to feed their baby in the office in accordance with their supervisor's approval.</p> <p>Based on field observation at MGE 2, MGE 3 and MGF it's known that female worker have understood their reproductive right, such as entitlement for menstrual leave. Based on interview with gender committee of PT TMP, its known that there is no case related to reproductive right of female workers</p>	
	<p>Status: Comply</p>
<p>6.10</p> <p>Growers and mills deal fairly and transparently with smallholders and other local businesses.</p> <p>PT Tunggal Mitra Plantation does not provide previous not the incoming FFB's price that can be accessed by public, because company does not purchase FFB from local smallholder, whether it comes from independent small holders or plasma smallholders. The entire FFB's supply in Manggala mill such as Manggala Estate 1, 2 and 3 comes from nucleus estate</p>	
	<p>Status: Comply</p>
<p>6.11</p> <p>Growers and millers contribute to local sustainable development wherever appropriate.</p> <p>PT TMP has an evidence related to company's contribution to local development. For instance the tax payment receipt on behalf of; PT Tunggal Mitra Plantation number 01.366.775.3-073.000 on 25th October 2014. There is CSR MGE-3 in 2015 that has been implemented such as cow grant for Idul Adha festivity 2014. Moreover, there is a minutes of cow handover No.002/MGE3/RU/PT.TMP/X/2014 yang di taht was is endorsed by Estate Manager and head of village. There are also minutes of handover of 2 volleyball fields, which was approved by Estate manager and accepted by youth organization on 29th Augustus 2015.</p> <p>PT. TMP does not have a plasma plantation scheme. Moreover, PT.TMPdoes not have an obligation to establish plasma plantation because the company was established long before the plasma plantation policy being issued</p>	
	<p>Status: Comply</p>
<p>6.12</p> <p>No forms of forced or trafficked labour are used.</p> <p>Based on review on the list of personnel's documentin PT TMP, its known that there was no illegal personnel. This finding was supported by interview result with the management unit and local contractor, which do not have illegal personnel because the entire personel are binded in a clear work agreement. Interview result with the management unit reveals that:</p> <p>Company is conducting annual evaluation toward personnel work performance, which becomes the basis for promotion. Personnel have read work agreement before they put their signature.</p> <p>Based on interview with the representative of LKS bipartite, its known that:</p> <p>Applicant should submit their interest letter personally</p> <p>There is no pressure on personnel to perform certain work and to have certain position</p> <p>Personnel understood her/his responsibility based on the existing work agreement</p> <p>Company provides evidence that there is no illegal worker trade, there is no forced labour nor there is a contract substitution.</p>	

Moreover, PT TMP does not have policy related to foreign worker or contractual worker and based on document's review there is no expatriate, migrant or temporary worker.

Interview with some personnel on estate and mill's operation activities, it's known that personnel have understood their right and responsibilities based on the signed-work agreement during the recruitment process

Status: Comply

6.13

Growers and millers respect human rights

PT TMP has a policy related to human right, which is part of company's commitment to protect human right. This policy is stated in Memorandum number 067/ SOU-16/ VIII/ 2015. Chairman SOU-16 Manggala approve this memorandum on 24th Augustus 2015. Company can present minutes of meeting and attendance sheet over the socialization of human right on 16th March 2015 at Manggala 2 estate, meanwhile in Manggala 1 estate company has delivered socialization on human right on 26th Augustus 2015 that was attended by 67 participants

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.

At the moment, PT Tunggal Mitra Plantation does not make any land clearing. However, there is replanting activity that has been started in 2014.

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.

At the moment, PT Tunggal Mitra Plantation does not make any land clearing. However, there is replanting activity that has been started in 2014.

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.

At the moment, PT Tunggal Mitra Plantation does not make any land clearing. However, there is replanting activity that has been started in 2014.

Status: Comply

7.4

Extensive planting on steep terrain, and/or on marginal and fragile soils, is avoided.

At the moment, PT Tunggal Mitra Plantation does not make any land clearing. However, there is replanting activity that has been started in 2014.

Status: Comply

7.5

No new plantings are established on local peoples' land without their free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.

At the moment, PT Tunggal Mitra Plantation does not make any land clearing. However, there is replanting activity that has been started in 2014.

Status: Comply

7.6

Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their free, prior and informed consent and negotiated agreements.

At the moment, PT Tunggal Mitra Plantation does not make any land clearing. However, there is replanting activity that has being started in 2014.

Status: Comply

7.7

Use of fire in the preparation of new plantings is avoided other than in specific situations, as identified in the ASEAN guidelines or other regional best practice.

At the moment, PT Tunggal Mitra Plantation does not make any land clearing. However, there is replanting activity that has being started in 2014.

Status: Comply

7.8

New plantation developments are designed to minimise net greenhouse gas emissions.

At the moment, PT Tunggal Mitra Plantation does not make any land clearing. However, there is replanting activity that has being started in 2014.

Status: Comply

PRINCIPLE #8 Commitment to continuous improvement in key areas of activity

8.1

Growers and millers regularly monitor and review their activities and develop and implement action plans that allow demonstrable continuous improvement in key operations.

Decreasing and utilization of pesticide

Minamas Plantation has a commitment to use pesticide that categorised in type 1A and 1B WHO and *paraquate* or the one that stated in Stockholm or Rotterdam convention. This commitment is stated in Memorandum from Head Plantation Operations No. POD-UM-128/X/2008, 2008 regarding the recommendation to change the application of *Paraquate-Gromoxone* in the entire Minamas Plantation estate area.

The management unit control pocket caterpillar by using *light trap*, this action was undertaken in a butterflies phase in order to reduce the utilization of pesticide.

Environment impact

Company has identified the possible impact due to company's operation activities. The environment management plan and environment-monitoring plan describe the required actions to manage and monitor the negative impact and increase the positive impact.

Reducing waste

waste management has been conducted based on the applicable regulation. Especially for liquid waste, company has had the license to utilize and monitor the quality of its liquid waste; moreover, company has had the license for temporary hazardous waste storage before send the hazardous waste to licensed collector. Solid waste such as shell, fibre and empty fruit bunches were re-utilized for operational activities.

Greenhouse gases pollution and emission

Company has identified the generated pollution and emission by monitor the quality of air and examine operational tools based on related-regulations. Moreover, company has calculated the greenhouse gas emission for period July 2014 – June 2015.

Social impact

Aksenta consultant conducted the analysis over social impact of company's replanting activity. The objective of this analysis is to review the environment and social impact of company's replanting activity and provide suggestions and guidance to manage the impact.

The impact of replanting is also described in environment management plan report and environment monitoring plan report of semester I in 2015 (Period January - June 2015).

There is also an internal audit of RSPO PT Tunggal Mitra Plantation on 26 – 27th Augustus 2015 by PSQM Dept (Rinno Ferryno and Ichsan Putra). The result of internal audit such as:

Principle 1 commitment on transparency 100 %

Principle 2 Legality 79 %

Sample NC: 2.1.1 Mill has no showed welders' certificate; moreover list of regulation has not been updated.

Principle 3 Economy&Finance 100 %
 Principle 4 Good practices on processing 93 %
 Sample NC: (4.4.3) LA permit has not been issued (under the review and license issuance process)
 Principle 5 Environment 85 %
 Principle 6 Social 86 %
 Sample NC (6.2.3) Record over communication with stakeholders has not been presented
 Principle 7 New land clearing 100% (NA)
 Principle 8 sustainable improvement 90 %

Status: Comply

3.2. Summary of Assessment Report of Supply Chain Requirement

Clause	(Module D) CPO Mills – Identity Preserved Requirements											
D1	Definition											
D.1.1												
A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from its own supply base certified to the RSPO Principles and Criteria (RSPO P&C). Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. If a mill processes certified and uncertified FFB without physically separating the material then only Module E is applicable.												
Manggala POM only receives and process the FFB sourced from 3 Estates, ie, each of Manggala 1 Estate, Manggala 2 Estate and Mangala 3 Estate. Here TBS received from November 2014 to August 31, 2015 (Re-Certification Audit Stage 02).												
	<table><tr><th>Sources</th><th>Receives (Ton)</th></tr><tr><td>Manggala 1 Estate</td><td>43,446.97</td></tr><tr><td>Manggala 2 Estate</td><td>51,551.05</td></tr><tr><td>Manggala 3 Estate</td><td>38,584.48</td></tr><tr><td>Total</td><td>133,582.50</td></tr></table>	Sources	Receives (Ton)	Manggala 1 Estate	43,446.97	Manggala 2 Estate	51,551.05	Manggala 3 Estate	38,584.48	Total	133,582.50	
Sources	Receives (Ton)											
Manggala 1 Estate	43,446.97											
Manggala 2 Estate	51,551.05											
Manggala 3 Estate	38,584.48											
Total	133,582.50											
	Status: Comply											
D.2	Explanation											
D.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.												
Until the implementation of the Re-Certification, Mangala POM only receive and process the FFB sourced from 3 Estates suppliers, ie each of Mangala 1 Estate, Mangala 2 Estate and Mangala 3 Estate. The following table CPO and PK produced by the Manggala POM from 25 November 2014 until August 31, 2015.												
	<table><tr><th></th><th>Actual certified product period 25 November 2014 s.d 31 August 2015 (ton/tahun)</th><th>Estimate Tonnage of Certified Product (ton/tahun)</th></tr><tr><td>CPO Production</td><td>31,442.99</td><td>38,305</td></tr><tr><td>PK Production</td><td>6,351.22</td><td>8,064</td></tr></table>		Actual certified product period 25 November 2014 s.d 31 August 2015 (ton/tahun)	Estimate Tonnage of Certified Product (ton/tahun)	CPO Production	31,442.99	38,305	PK Production	6,351.22	8,064		
	Actual certified product period 25 November 2014 s.d 31 August 2015 (ton/tahun)	Estimate Tonnage of Certified Product (ton/tahun)										
CPO Production	31,442.99	38,305										
PK Production	6,351.22	8,064										
	Status: Comply											
D.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).												
Manggala POM - PT Tunggal Mitra Plantation (Plantation Minamas) have registered for RSPO-certified products are CSPO and CSPK through IT Platform RSPO member registration number: 1000000330 RSPO_PO.												
Based on the data provided by the management of PT Tunggal Mitra Plantation, Certified palm oil products sold in the period from November 2014 until August 2015, outlined in the table below.												
	<table><tr><th>Date</th><th>Buyer</th><th>Volume (Ton)</th></tr></table>	Date	Buyer	Volume (Ton)								
Date	Buyer	Volume (Ton)										

14 October 2014	Unilever	10,000
26 November 2014	SIETCO	10,000
09 April 2015	Colgate Palmolive Company	12,479
11 April 2015	Unilever	12,000
Total		44,479

For certified PK, none sold in the period November 2014 to August 2015 (up to the implementation of the recertification audit Stage 02).

	Status: Comply
D.3	Documented procedures

D.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 company has adequate procedures for the implementation of supply chain in the POM, as indicated by:

- a. SOP Manggala POM refers to the Technical Manual mills 1, 2 and the proper administration of Head Plantation Memorandum Operation No.POD-UM-154 / VII / 2010 on July 26, 2010.
 - Acceptance Fruit No. 110 / POD-FAC / 07, Boiling (sterilization) No. 110 / POD-FAC / 07, striping No. 110 / POD-FAC / 07, Stirring (digesting) No. 110 / POD-FAC / 07, compression (pressing) No. 110 / POD-FAC / 07, Purification (clarification) No. 110 / POD-FAC / 07, Separation of seeds and fiber No. 110 / POD-FAC / 07, Station Kernel No. 110 / POD-FAC / 07, Palm Oil Stockpiling No. 110 / POD-FAC / 07.
 - Manggala POM has the SOP System Supply Chain Products, No. 027 / AIP-SCCS / 12 which was passed on 1 September 2012 by Mill Manager and Estate Manager that describe the shape of the product applied traceability.
- b. Personnel responsible for the application of these requirements include:
 - Factory Manager
 - Keep and maintain all documents and records of the use of all raw materials, supporting materials used in the production process and the quality of the final product.
 - Verification of the products delivered by the buyer to make sure the product is in accordance with the invoice, delivery order, sales contract and signed news product delivery event
 - Provide adequate training on the requirements of certified supply chain to all staff involved in the stages of the supply chain from the receipt of raw materials, production processes, storage and delivery of products to buyers.
 - Assistant Plantation Sustainable Quality Management (PSQM)
 - Checking the quality of FFB in the POM and create a daily recapitulation.
 - To supervise the delivery and unloading palm product
 - Perform analysis of testing the quality of raw materials and products in all stages of the production process
 - Storing, maintaining and distributing the results of the analysis and testing of the quality of raw materials and products to stakeholders concerned
 - Assistant / Senior Assistant / Manager Bulking responsible for the transportation of CPO and PKO products from POM to bulking station.

There is also evidence of training records related to SCCS, among others:

- List of present Training Supply Chain Certification System (SCCS) PT Tunggal Mitra Plantation, dated August 27, 2015 (Participant 26), trainer Rinno Ferryno (PSQM Manager)
- The training and implementation Photographs

From interviews with the administrative officer (recording) at weigh stations FFB and Foreman along with several officers in the grading area, show that the workers have learned that PT Tunggal Mitra Plantation currently only receive and process FFB have been certified, it is shown also on form -form they use.

Status: Comply

D.3.2

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

The entire FFB processed in Manggala POM originated from the Estates PT Tunggal Mitra Plantation (Manggala 1 Estate, Manggala 2 Estate and Manggala 3 Estate). FFB processed whole is 100% certified FFB (RSPO certified).

The Company has had a fruit reception mechanism by requiring the driver showed Letter Fruits of contractors Each garden and fruit. Fruit Letter explains the origin of the fruit and the quantity of fruit.

SOP mills passed by Mill Controller December 2011 include SOPs for the station weighbridge, loading ramps, station stew, Tippler and Thresher, station digester, station press, station oil room, station Depericarper, Station Nut Cracer, Kernel Silo, Dispatch CPO, dispatch Palm Kernel, Boiler House, Power Plant. Work Instructions are also available laboratory tests authorized by the Senior Mill Manager on April 1, 2011.

Status: Comply

D.4

Purchasing and goods in

D.4.1

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

FFB processed in Manggala POM entirely derived from the core estate of TMP, certified by the RSPO, so the output of palm oil produced is one hundred percent can be claimed as RSPO certified oil.

Manggala POM, TMP has documents and computerized programs for acceptance of FFB such as:

- Fruit Delivery Note (FDN) and weigh ticket which describes a weigh ticket number, serial number of FDN, FFB origin, transport, harvest date, centrifuge pieces of fruit, the planting, the block, the number of bunch, tonnage, vehicle number, date of delivery.
- SIME-weight program in order to know the information of FFB acceptance, CPO, Kernel, and others products.
- Mill Acceptance report that describes the product is received, the date of receipt, estate origin, number of vehicles, drivers, FDN number, weigh ticket number, date sent, hour of in and out weigh, gross weight, outweigh, net weigh. Estate Code (like Manggala-1 Estate / E462, Manggala-2 Estate / E463 and Manggala-3-estate / E464)
- Program of FFBGS (Fresh Fruit Bunch Grading System) which explains the quality of FFB that goes into the mill based on the grading of FFB and it can be informed (FFB Quality, determination of CPO production and kernel in each suppliers estate)

There are examples of Fruit Delivery Note and Fruit Weigh Tickets Receive FFB (RSPO certified) from the core estate, for example:

Fruit Delivery Note

Manggala 2 Estate

Division: IV

Blocks: D02

BJR: 22

Assessed Tonnage: 5,340 Kg

Delivery date: 08/31/2015

No. 46,315 to 006,587

Vehicle number: BM 8055 TQ

Trip Number: V

Hours Exit Field:

Hours Arrive On Factory: 19:55 pm

SPB has been stamped RSPO Certified

Weigh ticket fruit (FFB Receive)

Ticket: 231 551

Supplier: E463 Mangala 2 Estate

Transporter: E463-Manggala 2 Estate

Product: 0001-FFB A CROP (<24 hours)

Vehicle No: BM 8055 TQ

Driver Name: Sorman

Driver IC:

D.O No: 4631500657

Remarks:

Seal No:

Harvest Date: 31/08/2015

Bunches: 244.00 R

Estate Wt (kg): 5,340

Estate ABW: 20.96

Mil Wt (kg): 6,170

Act ABW: 24.22

Weigh ticket fruit (FFB Receive) has been stamped **RSPO Certified**.

Status: Comply
D.4.2
The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.

Manggala POM - PT Tunggal Mitra Plantation can recognize and claim the products are certified for a year for CPO products: 42,157.45 tons and Palm Kernel: 8,969.67 tonnes period 25 November 2014 to 24 November 2015.

Based on production data per November 2014 until August 31, 2015, total CPO and Kernel produced by Manggala POM are: CPO = 30,443.99 tons and Palm Kernel = 6,351.22 tons.

From the above data it is known that production of CPO and Kernel that can be claimed as a product certified by the Manggala POM - PT Tunggal Mitra Plantation not exceed projected. Management Manggala POM, PT Tunggal Mitra Plantation is committed to providing information to PT Mutuagung Lestari if there is production of CPO and Palm Kernel excess of those projected.

Status: Comply
D.5
Record keeping
D.5.1
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.

Manggala POM - PT Tunggal Mitra Plantation has had Monthly RSPO certified products (FFB, CPO and PK). The following table of monthly production in the base 3 months.

Months	Volume (Ton)		
	FFB	CPO	PK
Nov 2014– Jan 2015	41,155.13	9,462.18	2,043.37
Feb - Apr 2015	33,270.70	7,662.71	1,621.58
May – Jul 2015	40,763.55	9,211.85	1,872.09
Aug 2015	18,393.12	4,106.25	814.18
Total	133,582.50	30,442.99	6,351.22

	Status: Comply
D.6	Processing
D.6.1 The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept segregated from non-certified material including during transport and storage	
<p>Manggala POM only receive TBS derived from the nucleus of PT Tunggal Mitra Plantation (Manggala 1 Estate, Manggala 2 Estate, and Manggala 3 Estate). FFB processed whole is 100% certified TBS (RSPO certified)</p> <p>Until now Manggala POM does not accept or process FFB from other sources, based on existing documents and systems that have been implemented consisting of Letter Fruit, Tickets Weigh, Sales Contract and Application program SIME weight explaining the origin FFB (Division, block Harvest, year of planting, number of bunch) to the product in the form of CPO and PK is a 100% certified product (RSPO Certified). All documents related to the acceptance and processing systems have been marked (Stamp) RSPO Certified.</p>	
	Status: Comply
D.6.2 The objective is for 100 % segregated material to be reached	
<p>Based on the verification of documents and field visits in Manggala POM and interviews with officers and officials weigh grading, it is known that the Manggala processing Factory FFB into CPO and PK is 100% derived from the core estates. From the results of the verification sales document Sales Contract and Invoice indicate that all products of CPO and PK were shipped / sold is 100% RSPO Certified product.</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√
RC	PT Tunggal Mitra Plantation had approval/ permit the use of the certificate with the number MUTU-RSPO/002.	√
	Status: Comply	
2.	Implementation of certificate and logo used by Client comply with size and type (shape) against Guideline of Logo Use	X or√
RC	PT Tunggal Mitra Plantation does not use the logo both in the on-product and off-product.	√
	Status: Not Applicable	
3.	Implementation of Certificate and Logo is not used on product	X or√
RC	PT Tunggal Mitra Plantation does not use the logo both in the on-product and off-product.	√
	Status: Not Applicable	
4.	Controlling of Certificate and Logo, including withdrawing inappropriate logo.	X or√
RC	PT Tunggal Mitra Plantation does not use the logo both in the on-product and off-product.	√
	Status: Not Applicable	

3.4. Summary of RSPO Partial Certification.

Unit manajemen yang diobservasi:		
1. PT Mitra Austral Sejahtera		
2.1	Adanya kepatuhan terhadap semua hukum dan peraturan yang berlaku baik lokal, nasional maupun Internasional yang telah diratifikasi.	X or√
	PT Mitra Austral Sejahtera is compliance with applicable laws and regulations.	
	Status: Comply	√
2.2	Hak untuk menguasai dan menggunakan tanah dapat dibuktikan dan tidak dituntut secara sah oleh komunitas lokal dengan hak-hak yang dapat dibuktikan.	X or√
	PT Mitra Austral Sejahtera has demonstrated land use and not legitimately contested by local communities. The company's land acquisition process has been in accordance with the prevailing regulations	
	Status: Comply	√
6.3	Perusahaan menyediakan sarana dan mekanisme yang terbuka untuk menerima keluhan dan menyelesaikan perselisihan sesuai ketentuan dan peraturan yang berlaku.	X or√
	PT Mitra Austral Sejahtera has documented system for dealing with complaints and grievances, which is implemented and accepted by all parties. There is a Communication Procedure No. Policy 501/MAS-KOM-03/11 dated 8 April 2011 implemented through the Mail Box, Email, Announcements, posters, brochures / pamphlets and meeting / briefing, etc. To resolve complaints / disputes associated with land, the company has prepared a Compensation Negotiation Process Mechanism No Policy 501/MAS-Doc 01/11 dated 8 April 2011, which contains a flowchart of (derasa) compensation payment process through a amicable discussion and meetings with Muspika (Task Force).	
	Status: Comply	√
6.4	Setiap perundingan menyangkut kompensasi atas kehilangan hak legal atau hak tradisional dilakukan melalui sistem terdokumentasi yang memungkinkan masyarakat asli, komunitas lokal dan stakeholder lain memberikan pandangan- pandangannya melalui institusi perwakilan mereka sendiri.	X or√
	PT Mitra Austral Sejahtera has a Compensation Negotiation Process Procedure No. Policy 501/MAS-Doc 01/11 dated 8 April 2011, which contains a flowchart of compensation payment process (Derasa) through amicable discussion and meeting with Muspika. The pricing of compensation is based on the Minutes of Agreement on Compensation (Derasa) Pricing dated December 8, 2005 as agreed by PT MAS, Community Leaders and KUD managers, acknowledged by Sub-District Chiefs (3 Sub-districts). Socialization was held on December 9, 2005 and attended by 35 representatives of related groups.	
	Status: Comply	√
7.3	Penanaman baru sejak November 2005 tidak dilakukan di hutan primer atau setiap areal yang dipersyaratkan untuk memelihara atau meningkatkan satu atau lebih Nilai Konservasi Tinggi (High Conservation value).	X or√
	PT Mitra Austral Sejahtera has not replaced primary forest or any area required to maintain or enhance one or more High Conservation Values. Based on the company's Plantation Concession issued through Decision of Land Agency Head of Sanggau District No. 400-56/IL-1999 dated January 8, 1999 on the Granting of Extension Concession the Purposes of Palm Oil Plantation located at Parindu, Bonti, Hulu and Kembayan Tayan sub-districts in the name of PT Mitra Austral Sejahtera with a total area of 20,000 hectares of 30,000 hectares reserved area, the concession of PT MAS is located within Other Use Area (APL) in accordance with the Spatial Plan of West Kalimantan Province The company management has declared to the community that the company will preserve and will not cultivate palm oil crops in areas that have been identified as HCV (MAS-3 Estate's Statement Letter dated May 1, 2011). Local people / Indigenous Figures joined in Satlak were directly involved in the identification process of	

	areas where palm oil planting is not allowed in accordance with the agreement.	
	Status: Comply	
7.5	Tidak ada penanaman baru dilakukan di tanah masyarakat lokal tanpa persetujuan terlebih dahulu dari mereka, yang dilakukan melalui suatu sistem yang terdokumentasi sehingga memungkinkan masyarakat adat dan masyarakat lokal serta para pihak lainnya bisa mengeluarkan pandangan mereka melalui institusi perwakilan mereka sendiri.	X or√
	<p>Available EIA documents as approved by the Central EIA Committee letter the Department of Forestry and Plantations, No: 242/Menhutbun-II/2000, on March 23, 2000.</p> <p>The company has conducted studies of social impact, but until the implementation of Stage-1 is still in draft form. SIA mentioned in the draft document;</p> <p>a. Positive Impacts</p> <ol style="list-style-type: none"> Direct Impacts <ul style="list-style-type: none"> Significant local people are employed by the company. Emergence of livelihood sources. Increased revenue sources and incomes of the villagers. Increased productivity, value and status of land (impact of KKPA plasma development). Increased accessibility and mobility of people, goods and services. Public's positive perception to the company. Indirect <ul style="list-style-type: none"> The increasingly growth of local businesses Increased cash flow and fund circulation in the surrounding villages. Increased purchasing power of the local people. <p>b. Negative Impacts;</p> <ol style="list-style-type: none"> Direct impacts; <ul style="list-style-type: none"> Reduced size of public lands, Public's negative perception to the company, Dispute/conflict Indirect impacts and Accumulation <ul style="list-style-type: none"> Clean water problem, Impaired traditional value system of mutual cooperation, <p>- Change in lifestyles of rural people.</p> <p>Based on the Plantation Development Realization Report of the socialization of new land opening has been conducted in July to September 2010 for Bonti and Kembayan Sub-districts, and unit has done socialization of new land opening in March 2011 (Sedae, Canal, Mua, Kampuh, and Tapa sub-villages).</p> <p>Based on interviews with residents of RT Pinsam the company's new plantation opening process also involved te Satlak Team consisting of Sub-village Chiefs, Indigenous leaders, KUD Sekayam Jaya Manager and Village officials as officers who perform verification of the land to be opened.</p>	
	Status: Comply	√
7.6	Masyarakat Setempat diberikan Kompensasi atas setiap pengambilalihan lahan dan pelepasan hak yang disepakati dengan persetujuan sukarela yang diberitahukan sebelumnya dan kesepakatan yang telah dirundingkan.	X or√
	<p>There is a Land Compensation Negotiation Process procedure No. 501/MAS-Doc 01/11 dated 8 April 2011 in which contains a flow chart of compensation process involving amicable deliberation and meetings with Muspika (Task Force).</p> <p>Documented process and agreement of land acquisition for new plantation area are maintained in MAS 3 Estate's office and RSPO secretariat office in MAS 1 Estate.</p>	
	Status: Comply	√

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

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

CAR No	Ref Std	Finding	Area	Grade	Time Limits	Corrective Action	Observation	Status	Closing Date
2014.01.	Major 2.1.1	Requirements Fulfillment of Applicable Law 1. The company does not yet have enough evidence to prove that paramedical company has received training in the field of Corporate Hygiene, Occupational Health and Safety in accordance with the Ministerial Regulation no. 1 in 1979. 2. There is no enough evidence of OHS license (SIO) for boiler operator in accordance with the Ministerial Regulation No. 1 in 1988.	Mill and estate	Major	60 days	PT TMP should been indicate evidence of compliance to requirement law.	The Root Cause: The Company has not been consistently updating monitoring about compliance of applicable regulations. Corrective Action: The company showed evidence of compliance of relevant regulations such recordings of Hiperkes training for paramedics and OHS valid licensed (SIO) for boiler operators. Precautions: Monitoring the company's efforts in compliance of existing regulations were consistently done. Auditor Conclusion : Observation on September 19, 2014 1. The company showed The recording of Hiperkes training for paramedics, on behalf of Jamaluddin Gultom published by OHS Agency, Medan, on August 30, 2014. 2. The company showed the recording of Hiperkes training for	Closed	September 19, 2014

CAR No	Ref Std	Finding	Area	Grade	Time Limits	Corrective Action	Observation	Status	Closing Date
							paramedics, on behalf of Jamaluddin Gultom published by OHS Agency, Medan, on August 30, 2014 with a validity period until November 30, 2017. Based on the evidence of improvement shown Incompatibility 2014.01, Major category was closed.		
2014.02.	Major 2.2.2.	Demarcation of Legal Boundaries The results of the field monitoring, Boundary Poles no. 63, 64, and 65 in J004 and I005 - Division I Manggala 2 shows that the location of Boundary Poles are not in accordance with the concession of boundary map, issued by National Land Agency in 1998.	Estate	Major	60 days	PT TMP Must indicate evidence of legal boundaries (HGU stakes of BPN) had been accurate demarcation and maintained appropriate with applicable regulations.	Root Cause: Accurate demarcation of legal boundaries cannot be done because National Land Agency didn't have data of coordinate's points for boundary poles. Corrective Action: Management units have addressed a letter to Head Office of National Land Agency on June 10, 2014 and Province National Agency on August 18, 2014. This letter related to renewal of LUT of PT. TMP. The letter was delivered in purpose to extend and renewal of LUT of PT. TMP, it was also needed to do re-verification of coordinates points for Boundary Poles in accordance with the actual conditions in the field. It should be done along with National Land Agency Team. Precautions: Periodically Monitoring of Boundary Poles in accordance with applicable SOP. Auditor Observation	Closed with observation	October 21, 2014

CAR No	Ref Std	Finding	Area	Grade	Time Limits	Corrective Action	Observation	Status	Closing Date
							October 21, 2014 The company already has an action plan for improvement of the legal boundary demarcation of PT. TMP which has started its implementation through proposing extension and renewal of LUT addressed to Head Office of National Land Agency (NLA), dated June 30, 2014 and NLA of Riau Province (dated August 18, 2014). Furthermore, NLA has responded on September 18, 2014 contains directions to PT. TMP for continued coordination with the Provincial NLA. Against this process, the auditor assess corrective action taken are acceptable, and the observations of progress will be continued as well as the improvement of the company to monitor the process along with the competent authority. Based on the improvement shown through the evidence.		
2014.03.	Minor 4.2.1	Record of Soil Analysis The Company has not been able to show the newest results of soil analysis, in accordance with soil analysis procedures that apply in the company (MRC).	Estate	Minor	Re-Certification	PT TMP must be able to demonstrate the latest results of soil analysis in accordance with the standards that are owned by the company.	Root Cause: Soil analysis has not been done by the entire PT TMP. Corrective Action: MRC will continue the analysis of the ground in September 2014. Precautions: MRC routinely analyzed soil periodically every 5 years. Observation of September 2, 2015	Closed	02 September 2015

CAR No	Ref Std	Finding	Area	Grade	Time Limits	Corrective Action	Observation	Status	Closing Date
							Soil sampling has been carried out on 16 to 21 January 2015 and the results of soil analysis accept by the unit Estate on January 26, 2015. Auditor Conclusion : NC No. 2014.03 otherwise closed.		
2014.04.	Minor 4.4.1	Recording of Water Management Program The company has not provided sufficient evidence of the implementation of appropriate water quality monitoring program as well as available environmental management plan, particularly: 1. Taking sample of plankton and benthos in order to be analysed in a designated laboratory (river closest to the WWTP LA area, treatment pool in the area of POM). 2. Observe the presence and type of nekton in the waters of the activities location.	Mill and estate	Minor	Re-Certification	PT TMP must demonstrate a recording of the water management program in accordance with environment monitoring plant.	Root Cause: Has not been examined in depth analysis of river water for the parameters of plankton, benthos and nekton Corrective Action: Immediately analyze parameters of plankton, benthos and nekton and reported in the RKL / RPL each semester. Precaution: Analyzing the above parameters of each semester. Observation of September 2, 2015 Company report shows the results of measurements of plankton and benthos April 20, 2015 conducted by Binalab (No. Sert Test 306-2 / PB / OF / IV / 2015) in the Upper and Lower Creeks Bangko. However, for the observations the existence and type of nekton yet to be demonstrated. Auditor Conclusion: Based on RSPO Certification System annex	Open	

CAR No	Ref Std	Finding	Area	Grade	Time Limits	Corrective Action	Observation	Status	Closing Date
							4.2.2.4 then the non-compliance No. 2014.04 with a minor category is changed into major category and should be improved within 60 days time at the latest(02nd November 2015).		
2014.05	Minor 4.7.2	Periodic Health Examination for High Risk Workers Based on the results of periodic health examinations on June 2014, there were workers who suffered health problems, but they have not provided sufficient evidence of follow up that has made by the company in order to protect workers from the negative impact of operational activities	Mill and Estate	Minor	Re-Certification	PT TMP must show evidence of periodic follow up on the results of the examination for employees who experience health problems.	Root Cause: No certified nurse Hiperkes competent to evaluate the company's MCU while the doctor was not in place. Corrective Action: Doctors and nurses Hyperkes immediately analyze and evaluate the results of the MCU Precaution: MCU periodically conduct and evaluate the results. Observation of September 2, 2015 The company shows the results of further investigation for the four workers who suffered health problems in the RS Supreme Rokan Hilir on 19 September 2014, with the recommendation 1 workers must be transferred to a job that is not heavy. Auditor Conclusion: NC No. 2014.05 has been closed.	Closed	02 September 2015

3.5.2 Identification of Findings, Corrective Actions and Observations at Re-Certification Assessment

CAR No	Ref Std	Finding	Area	Grade	Time Limits	Corrective Action	Observation	Status	Closing Date
2015.01	Minor 4.4.1	Recording of Water Management Program The company has not provided sufficient evidence of the implementation of appropriate water quality monitoring program as well as available environmental management plan, particularly: 1. Taking sample of plankton and benthos in order to be analysed in a designated laboratory (river closest to the WWTP LA area, treatment pool in the area of POM). 2. Observe the presence and type of nekton in the waters of the activities location.	PT TMP	Minor 2014.04 upgrade to Major	02 Nop 2015	PT TMP must demonstrate a recording of the water management program in accordance with environment monitoring plant.	Root Cause: Has not been examined in depth analysis of river water for the parameters of plankton, benthos and nekton Corrective Action: Immediately analyze parameters of plankton, benthos and nekton and reported in the RKL / RPL each semester. Precaution: Analyzing the above parameters of each semester. Observation 21 September 2015 Nekton has been shown observations but has not shown evidence that the results of these observations have been analyzed and incorporated into the document RKL / RPL. October 22, 2015 PT TMP has shown evidence of improvement in the form of: <ul style="list-style-type: none"> Implementation Report RKL / RPL Semester I 2015 (January - June 2015) that has included observations Nekton. Proof of delivery of the Report of the RKL / RPL Semester I 2015 (January - 	Closed	22 October 2015

CAR No	Ref Std	Finding	Area	Grade	Time Limits	Corrective Action	Observation	Status	Closing Date
							<p>June 2015) to Bapedalda Rokan Hilir Environment Agency - Pekanbaru and the Ministry of the Environment Pollution Control Assistant Deputy Agro Industry.</p> <p>Auditor Conclusion: Based on the evidence of improvements mentioned above, the discrepancy in these indicators has otherwise been fulfilled.</p>		
2015.02	Minor 5.2.3	<p>Program for educating work force regularly, particularly related to the status of RTE species and indiscipline action toward perpetrator who catch, hurt, collect or kill wildlife.</p> <p>PT TMP has not showed the education program to educate workforce on the status of RTE species.</p> <p>PT TMP has not set the indiscipline action toward perpetrator who catches, hurts, collects or kills wildlife in RTE</p>	PT TMP	Minor	ASA-1.1	PT TMP should present the existing program that educate work force regularly, particularly related to the status of RTE species and set the indiscipline action toward perpetrator who catches, hurts, collects or kills wildlife	<ul style="list-style-type: none"> • Root cause: • Corrective action • Preventive action: • Auditor conclusion: 		
2015.03	Major 6.1.3	<p>Plans to avoid or reduce the negative impact and enhance positive impact should be developed through participatory approach by involving direct affected communities, properly documented and arranged.</p> <p>There is an implementation report over environmental management plan and environmental monitoring plan of PT TMP</p>	PT TMP	Major	02 nd Nov 2015	PT TMP should present the evidence that the plans have been developed through participatory approach by involving the direct-affected communities, properly documented and scheduled.	<p>Root cause: Lack of communication and consultation to the affected communities</p> <p>Corrective action Conduct meetings and provide questionnaires to communities around the company affected and evaluate the results of the questionnaire</p>	Closed	October 15, 2015

CAR No	Ref Std	Finding	Area	Grade	Time Limits	Corrective Action	Observation	Status	Closing Date
		Semester 2 in 2014, Period July – December 2014 and Period January – June 2015, as well as record evidence over the implementation of monitoring on social impact (questioner, analysis result and social impact management). However, lack of evidence that the plans have been developed through a participatory approach by involving the direct-affected communities, properly documented and scheduled					<p>Preventive action: Will be a meeting / questionnaires to communities around the company every six months and entered into the RKL / RPL</p> <p>Observations October 15, 2015 Has shown some evidence of improvements:</p> <ul style="list-style-type: none"> ▪ Social Impact Management Programme PT Tunggal Mitra Plantation Plantation, Period 2015 - 2016 (document signed by the head of the village around the area PT TMP) ▪ Results Analysis Questionnaire ▪ Evidence of the handover of the questionnaire in villages linked <p>Auditor conclusion: Based on the above evidence of these improvements, the discrepancy declared to have met.</p>		

3.5.3 Opportunity for Improvement

No	Ref Std	Descriptions
1	Major 4.6.6 Major 5.3.2	Company need to consistently ensure that the entire used-pesticide packages have been stored in licensed temporary hazardous waste.
2	Major 4.6.11 Minor 4.7.6	Company should ensure the sustainable medical treatment toward personnel who has a medical problem based on MCU result in June 2015 will be implemented (Observation)
3	Minor 4.7.5	Company should ensure the completeness of first aid kits by conducting monitoring based on recommendation from medical staff (Observation)
4	Minor 5.3.3	PT TMP is encouraged to comply the size of temporary waste landfill with the licensed specification (the size should be = 6 m x 5m x 3m meanwhile the actual size is in the field is ± 11 m x 5 m x 3 m), or company should build a new landfill for estate because the size of temporary hazardous waste landfill is not sufficient.

3.5.4 Noteworthy Positive Components

No	Ref Std	Descriptions
1		Company has a commitment to manage sustainable palm oil plantation through RSPO certification.
2		Competency of <i>Personal in Charge (PIC)</i> in each of their area
3		Presentation of sufficient documents
4		Kasih Bunda integrated medical service in Manggala-3 Estate earned best integrated medical service in Pujud Sub-district

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

Public Issues (Institution/ NGO/Community)	Management Responses	Auditor Responses
<p><u>Environment Management Agency in Rokan Hilir District</u></p> <ul style="list-style-type: none"> • Communication between PT Tunggal Mitra Plantation with local Environment management Agency has run smoothly • PT Tunggal Mitra Plantation has been periodically submit its environment management plan and environment monitoring plan report • There was no issue related to complain due to PT TMP estate and mill's operation from Environment management Agency • There was no issue or report related to fire within PT TMP's operation area. • Related to the change over land application location of PT TMP that located in the same area, the Environment management Agency has now this issue and still under the review and license issuance process. Subsequently, this issue complies the applicable regulation. • PT TMP has submitting the request to extent land application license, which will be expired soon <p><u>Suggestions:</u> The manifest or other information related to hazardous waste should have a copy in hazardous waste warehouse archive, so the future audit will easily find the document without spending more time on waiting officers to collect the manifest from archive room in capital office.</p>	<ul style="list-style-type: none"> - Communication has been running will be maintained - Will prepared archive documents neraca hazardous waste in a warehouse/Temporary hazardous waste chemical 	<ul style="list-style-type: none"> • Based on a review of documents and interviews also to the surrounding villages, there are the issues of the complaint of the parties on the management of mill PT Tunggal Mitra Plantation. • Field observations also indicate that PT TMP has made the installation of Planned re-measurement area PT. TMP will be conducted by BPN Rokan Hilir on October 23, 2015 sign boards these warnings and other conservation areas / HCV.



Public Issues (Institution/ NGO/Community)	Management Responses	Auditor Responses
National Land Agency, Rokan Hilir District <ul style="list-style-type: none"> Until now, there was no issue or conflict within PT Tunggal Mitra Plantation's area. National land agency conducts monitoring related to vacant area. There was no periodic reports that should be submitted to National land agency in district level because the National land agency runs its administrative function such as recording, except in case there is a double land certificate. Related to re-measurement over PT TMP operation area, the responsibility to do so is in the hand of National land agency in Provincial level, as stated in National land agency province's letter to PT TMP. 	Planned re-measurement area PT. TMP will be conducted by BPN Rokan Hilir on October 23, 2015	<ul style="list-style-type: none"> Based on interviews in two villages and field observations, not found any significant conflicts in the control and operation of oil palm plantation PT TMP. PT TMP has planned to carry out repeated measurements for the area and it has been described also by BPN staff Rokan Hilir district who met while consultation.
Forestry Agency, Rokan Hilir District <ul style="list-style-type: none"> At present, there is a decree from ministry of forestry number 878/Menhut-II/2-14 regarding the forest area in Riau province. This decision letter is valid for arranging new permit that will be issued in January 2015. the position of PT TMP plantation according to forest map based on the aforementioned Decree 878/Menhut-II/2-14 is other utilization forest category. PT TMP is suggested to conduct overlay on estate area by attaching forest map based on the aforementioned decree in order to precisely located the position of PT TMP's estate area. 	The company will continue to improve communication with the Forest Agency.	<ul style="list-style-type: none"> Based on the verification of documents, it is known that the area of governance PT TMP has been thinking about an appropriate license issued by the relevant agencies (eg the Location Permit, IUP and Certificates HGU). The position of PT TMP garden area on the map forest areas by the Minister of Forestry No. 878 / Menhut-II / 2-14 on the Forest Region Riau Province is Areas of Use (APL), so no need for adjustments to document the legality of land PT AMP.
Plantation Agency in Rokan Hilir District <ul style="list-style-type: none"> At present, there is no issues or objectives from related parties toward PT Tunggal Mitra Plantation mill's and estate operation. Moreover, there is no conflict related to land management 	PT. TMP will further increase the frequency of CSR-related activities for the community around the company	Based on the results of stakeholder consultation, both with the Department of Plantation and in two nearby villages, it is known that PT TMP has conducted activities in cooperation with local communities in fire prevention efforts.

Public Issues (Institution/ NGO/Community)	Management Responses	Auditor Responses
<p>within PT Tunggal Mitra Plantation area.</p> <ul style="list-style-type: none"> PT TMP has been collaborated with local communities for monitoring and managing fire. In each village, there is a <i>Masyarakat Peduli Api</i> (MPA) group, who received socialization and fire extinguishers tools from company. PT TMP has not periodically submits its plantation report (LPUP). <p><u>Suggestions:</u> Company's activities related to CD/CSR should be improved in order to ensure local community gain benefit from the activities.</p>		
<p>Manpower Agency, Rokan Hilir District</p> <ul style="list-style-type: none"> Relationship between PT TMP and manpower agency runs well and always being improved, especially in term of coordination] PT TMP pays its personnel wage based on the applicable minimum standard wage in district level, which is IDR. 1,900,000/ Month. There is no objection nor incoming report to local manpower agency related to violation toward personnel's right. There was a case of work contract termination toward one personnel in PT TMP, however company has settle all its responsibility. Personnel's right has been released and the report about the case has been submitted to local manpower agency. PT TMP pays personnel social insurance. When personnel complain about the social insurance, its more likely related to the limited facilities that being covers by such a insurance. According to some personnel, the current manpower social insurance, which is a mandatory from government of Indonesia has limited service compare to previous social insurance that comes from company. 	<ul style="list-style-type: none"> Will maintain good relationships and communication between the company and Manpower Put CSR-related programs in productive activities for the community will be discussed with the management of the center. 	

Public Issues (Institution/ NGO/Community)	Management Responses	Auditor Responses
<p><u>Suggestions:</u> The CD/CSR program of PT TMP should be directed toward productive activities, which can provide better work opportunity for local communities.</p>		
<p><u>Suka Mulya Village</u></p> <ul style="list-style-type: none"> The impacts of PT TMP mill and estate operation, such as: <ul style="list-style-type: none"> - There is an opportunity for vacancy - There are grants and assistances for local community, such as: <ul style="list-style-type: none"> ❖ Company gave assistance in a form of office furniture and kits for vilage office. ❖ Company prvides school bus to drop and pick junir and senior high school student. ❖ Company lend heavy equipment to improve road condition in the village ❖ Company grants meat assistacen for idul adha festivities. Company established <i>Masyarakat peduli Api</i> (MPA) group, deliverd training and coaching . There is no conflict related to land management with local communities There is no issue nor negative impact related to PT TMP estate and mill's operation. Sukamulya village is located quite far away from estate and mill's location. Moreover, there is no river that passing through the village. <p><u>Aspiration:</u></p> <ul style="list-style-type: none"> Before company conducts spraying or fertilization acitvities, compnay should give previous infomration for local communities, because emost of local communities' 	<ul style="list-style-type: none"> - PT TMP will continue aid programs to the community village of Suka Mulya - Activities fertilizing and spraying will be shared with the surrounding community 	<p>PT TMP has conducted activities in cooperation with local communities in fire prevention efforts. In each village had formed the group "Concerned Citizens of Fire" (MPA) and based on the information of the group that PT TMP has given directives and some support facilities related to the presence of the MPA group.</p>

Public Issues (Institution/ NGO/Community)	Management Responses	Auditor Responses
livestock used to graze in surrounding plantation area • Moreover, company is expected to provide more work opportunity for local people		
Sido Rukun Village, Siarang-arang Village • There were no cases of land management conflicts between local villagers and PT TMP • No of issues and cases related to the negative impact of the management of mill PT TMP. • The company has provided some assistance such as heavy machinery to repair roads in the village. • Currently in the local villages have formed community groups concerned with Fire (MPA) ever gained coaching / training of the PT TMP	PT TMP has been to provide guidance for MPA and has provided some relief	PT TMP has conducted activities in cooperation with local communities in fire prevention efforts. In each village had formed the group "Concerned Citizens of Fire" (MPA) and based on the information of the group that PT TMP has given directives and some support facilities related to the presence of the MPA group.
Union Worker • Company provides freedom for establishing and joining worker union. • The suggestion to establish LKS Bipartite comes from personnel • The election of the chairman for LKS Bipartite has been democratically conducted and committee come from various agencies. These agencies are periodically conducting meeting with company. • Involve in conducting socialization on worker social insurance/BPJS • Company gives facilities such as vehicle for mobilization, consumption and room for meeting. • Company pays wage and allowance in accordance with the applicable regulation. • Welfare facilities for personnel is sufficient • There is an expectation that the carrier path could be smoothly run.	Maintain communication and good relations with the United bipartite	• The results of verification of documents and interviews with representatives of the workers, it is known that the company has standardized wage Minimum Wage Agriculture / Horticulture (Rp. 2.1255 million) • No of issues about the labor dispute between the company and its employees. • The Company has granted to employees to freedom of association / assembly.

Public Issues (Institution/ NGO/Community)	Management Responses	Auditor Responses
FFB and building's contractors <ul style="list-style-type: none"> • The current contractor replaces the previous contractor and has been being working for 4 months. • Contractor received vacant information directly from company because contractor came to company. • There are 10 personnel who work in building work and all of them do not receive insurance because they are temporary workers (they will only work for 1-3 months). • Payment of contractor's wage is always transferred on time. • Chief of contractor usually gives briefing related to fieldwork. • Chief of contractor conducts regular meeting with company to discuss related issues, such as the age of worker, PPE, insurance and work-related issue. • The accepted age for worker is at least 20 years old. • There is no disappointment from contractor during the collaboration with company. • Contractor wage is based on the bulk of the work. 	<p>While maintaining the communication of information related to the work of the contractor FFB</p>	<ul style="list-style-type: none"> ▪ Results of the verification documents show that the rights and obligations of each party has been set in the contract, including the use of Personal Protective Equipment and repayment period. • • There are examples of invoice and receipt of payment in accordance with those set forth in the contract between the local contractor and PT TMP.
Head of gender committee <ul style="list-style-type: none"> • Gender committee is selected by personnel • The latest gender socialization and sexual harassment was conducted in 2013 • In 2015, there was no filing related to domestic violence. • Company's assistance to gender committee is in a form of monthly vehicle provision, consumption and meeting room, as well as other assistance based on the need of gender committee 	<p>Encourage and support gender committee to be active in the appropriate program</p>	<ul style="list-style-type: none"> ▪ No of issues related to violation of the rights of women. • From the results of interviews with employees in mind that the company has implemented labor law No. 13 of 2003 related to granting leave to women giving birth past.

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 and audit team to acknowledge a field assessment and agree for all content explained in this assessment report, included of nonconformities issues.</p> <p>Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end; margin-top: 100px;"> <div style="text-align: center;"> <p>PT Tunggal Mitra Plantation Management Representative</p>  <p><u>Mohamad Pirabaharan</u> October 22nd, 2015</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><u>Oktovianus Rusmin</u> October 22nd, 2015</p> </div> </div>

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

No	Institution/NGO/Community	Address	Phone/Email	Form of Communication	Date of Contact	Response	
						Yes	No
1.	Plantation Agency of Rokan Hilir	Sub-District of Rokan Hilir, Riau Province.	-	Interview	September 2 nd 2015	√	
2.	Labor Agency of Rokan Hilir.	Sub-District of Rokan Hilir, Riau Province.	-	Interview	September 2 nd 2015	√	
3.	Environment Agency of Rokan Hilir Regency	Sub-District of Rokan Hilir, Riau Province.	-	Interview	September 2 nd 2015	√	
4.	National land agency of Rokan Hilir	Sub-District of Rokan Hilir, Riau Province.	-	Interview	September 2 nd 2015	√	
5.	Village of Sukamulya	Village of Sukamulya, District of Pujud Sub-district of Rokan Hilir, Riau Province.	-	Focus Group Discussion	September 1 st 2015	√	
6.	Village of Sido Rukun, Siarang-arang	Village of Sido Rukun, Siarang-arang	-	Interview	September 2 nd 2015	√	
7.	WALHI (Wahana Lingkungan Hidup)		informasi@walhi.or.id or info@walhi.or.id	Kuesioner via Email	August 25, 2015		√
8.	AMAN (aliansi masyarakat adat nusantara)		rumahaman@cbn.net.id	Kuesioner via Email	August 25, 2015		√
9.	WWF		wwf-indonesia@wwf.or.id	Kuesioner via Email	August 25, 2015		√
10.	SAWIT WATCH		info@sawitwatch.or.id	Kuesioner via Email	August 25, 2015		√
11	Pengurus Unit Kerja Serikat Pekerja Pertanian dan Perkebunan	Manggala 2 dan Manggala 3	-	Interview	September 2 nd 2015	√	
12	Gender Committee	Manggala-2 Estate dan Manggala-3 Estate	-	Interview	September 2 nd 2015	√	
13	Building Local Contractor	-	-	Interview	September 2 nd 2015	√	

Appendix 2. Assessment Program

Tanggal	31 August – 04 September 2015				
PROGRAM	PROSES / HAL YANG DIAUDIT	AUDITOR			
		ORN	NKI	SHW	RPA
Monday, August 31, 2015					
06.00 – 17.00	JAKARTA → PEKANBARU Traveling from Pekanbaru to Plantation Site Opening Meeting	√	√	√	√
Tuesday, September 01, 2015					
08.00 – 12.00	<u>Field Visit to Manggala 2 Estate</u> <ul style="list-style-type: none">• Stakeholder Consultation (Village Surround) & Boundary Stones• Best Management Practices and Health & Safety (Manuring, Spraying, Harvesting)• Agrochemical Store, BSS & Emergency Equipment Check + Emergency Team Interview• Conservation Area (HCV area), Water Management & Management of Environment (Environment monitoring station & GHG, etc)• Worker Facilities (Housing, health clinic, clean water, etc)• Worker Rights (Interview of Workers and Gender Committee)	√			
12.00 – 14.00	<u>Break</u>	√	√	√	√
14.00 – 17.00	<u>Field Visit to Manggala POM</u> <ul style="list-style-type: none">• SCCS Verification• Emergency Equipment Check & Emergency Team Interview• Production/Processing and Health & Safety + Local Contractor Interview• Hazardous Waste Storage, POME + Land Application• Management of Environment (Environment monitoring station & GHG, etc)• Worker Facilities (Housing, health clinic, clean water, etc)• Worker Rights (Interview of Workers and Gender Committee)	√			
Wednesday, September 02, 2015					
08.00 – 17.00	Stakeholder Consultation to Related Agencies in Rokan Hilir District	√			
08.00 – 12.00	<u>Field Visit to Manggala 3 Estate</u> <ul style="list-style-type: none">• Stakeholder Consultation (Village Surround), Boundary Stones• Conservation Area (HCV area), Water Management & Management of Environment (Environment monitoring station & GHG, etc)• Best Management Practices and Health & Safety (Manuring, Spraying, Harvesting)• Agrochemical Store, BSS & Emergency Equipment Check + Emergency Team Interview• Worker Facilities (Housing, health clinic, clean water, etc)• Worker Rights (Interview of Workers and Gender Committee)			√	
			√	√	
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12.00 – 14.00	Break	√	√	√	√
14.00 – 15.00	• Stakeholder Consultation (Internal Stakeholder : Labour Union & Gender Committe)		√		√
14.00 – 16.00	• Continuos of Field Visit			√	
15.00 – 16.00	• Local Contractor Interview		√		√
16.00 – 17.00	• Clarifition of NCR previous Audit (ASA 04)		√	√	√
Thursday , September 03, 2015					
08.00 – 12.00	• Clarification of Field Visit Result for all Audit Sample & Clarification Stakeholder Consultation Result.	√	√	√	√
12.00 – 14.00	Break	√	√	√	√
14.00 – 16.00	• Team Auditor Meeting (Preparation for audit conclusion)	√	√	√	√
16.00 – 17.00	• Closing Meeting	√	√	√	√
Friday , September 04, 2015					
08.00 – 15.00	Travel from PT TMP to Pekanbaru	√	√	√	√
18.00 – 20.30	PEKANBARU → JAKARTA				