

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

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

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

Plantation Name : **Agronusa Investama Estate**

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

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

Date of Certificate Issue : 22 April 2013

Date of License Issue : 22 April 2016

Date of Certificate Expiry : 21 April 2018

Date of License Expiry : 21 April 2017

Assessment	Assessment Date	PT Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-3	15-20 February 2016	Oktovianus Rusmin; Naila Karima; Mohamad Amarullah and Steve Mualim	Octo HPN Nainggolan	Tony Arifiarachman

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-3	May 23 rd 2016

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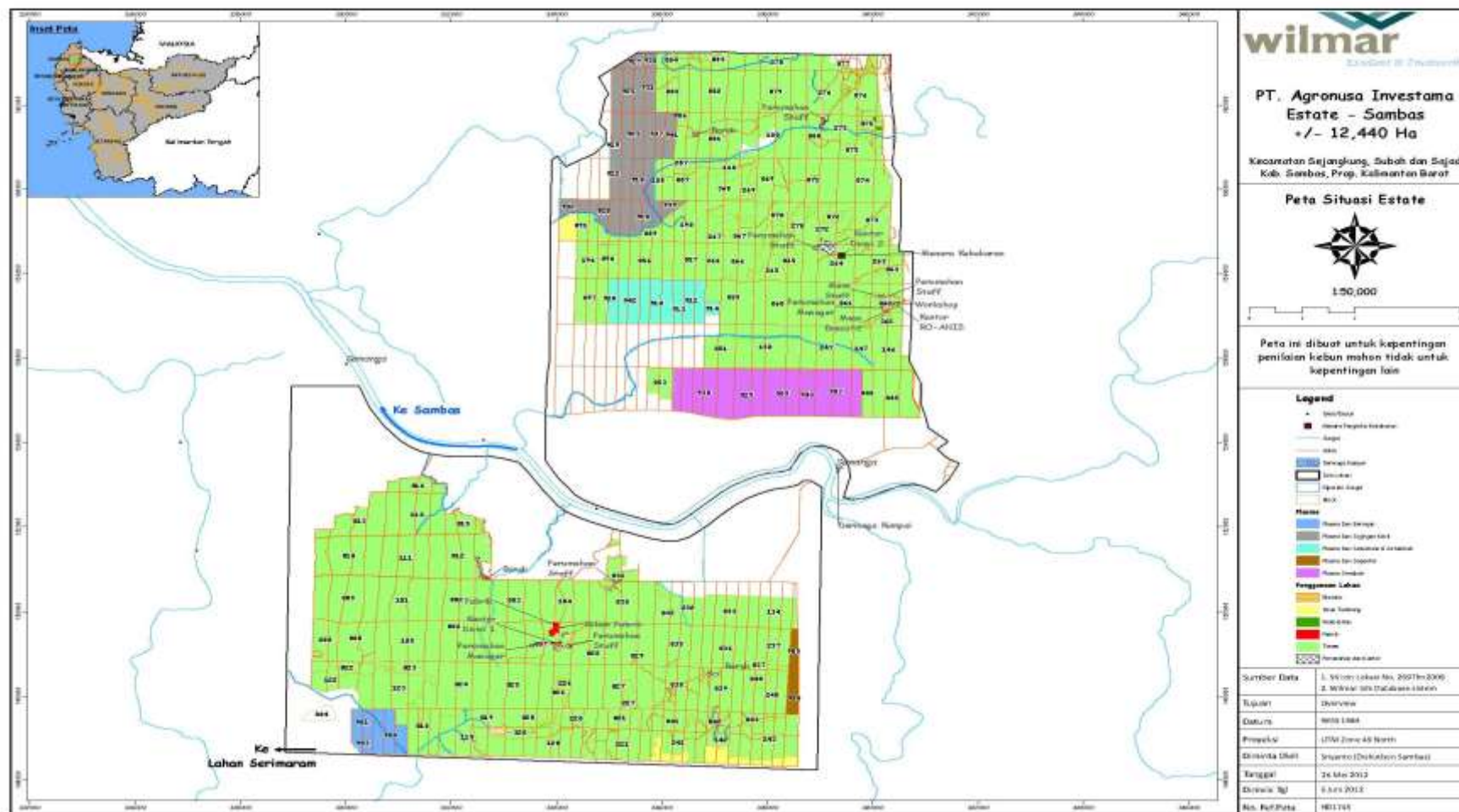
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Figure 1. Location Map of PT Agronusa Investama



Figure 2. Operational Map of PT Agronusa Investama



Abbreviations Used

AMDAL	:	<i>Analisis Mengenai Dampak Lingkungan</i> (Social and Environmental Impact Assessment)
ASA	:	Annual Surveillance Assessment
BOD	:	Biological Oxygen Demand
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i> (Social Assurance of Labor)
CD	:	Community Development
CPO	:	Crude Palm Oil
CSR	:	Corporate Social Responsibility
HCV	:	High Conservation Value
HGU	:	<i>Hak Guna Usaha</i> (Land Use Permit)
HIRARC	:	Hazard Identification Risk Assessment and Risk Control
IPM	:	Integrated Pest Management
ISPO	:	Indonesian Sustainable Palm Oil
IUP	:	<i>Izin Usaha Perkebunan</i> (Plantation Operation License)
EFB	:	Empty Fruit Bunch
EHS	:	Environment, Health and Safety
EIA	:	Environment Impact Assessment
FFB	:	Fresh Fruit Bunches
KER	:	Kernel Extraction Rate
LC	:	Land Clearing
LCC	:	Legume Cover Crop
MB	:	Mass Balance
NC	:	Non Conformity
OER	:	Oil Extraction Rate
OHS	:	Occupational Health and Safety
P2K3	:	<i>Panitia Pembina Keselamatan dan Kesehatan Kerja</i> (Occupational Safety and Health Committee)
PGA	:	Personal General Affair
PK	:	Palm Kernel
POM	:	Palm Oil Mill
PT ANI	:	PT Agronusa Investama
PPE	:	Personal Protection Equipment
RKL/RPL	:	<i>Rencana Kelola Lingkungan / Rencana Pemantauan Lingkungan</i> (Environmental Management Plan / Environment Monitoring Plan)
RSPO	:	Roundtable on Sustainable Palm Oil
SIA	:	Social Impact Assessment
SOP	:	Standard Operational Procedure
UKL/UPL	:	<i>Upaya Kelola Lingkungan / Upaya Pemantauan Lingkungan</i> (Environmental Management Efforts / Environmental Monitoring Efforts)
WTP	:	Water Treatment Plant
WWTP	:	Waste Water Treatment Plant

1.0	SCOPE of the CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used	<ul style="list-style-type: none">• RSPO Principles and Criteria (P&C) for the Production of Sustainable Palm Oil - April 25th, 2013.• RSPO Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on November 21st, 2014 (Module E for CPO Mill).	
1.2	Organization Information		
1.2.1	Organization name listed in the certificate	PT Agronusa Investama – Wilmar International, Ltd.	
1.2.2	Contact person	SIMON SIBURAT	
1.2.3	Organization address and site address	Head Office : 56 Neil Road, Singapore 088830. Estate Site: Sub District of Sejangkung, District of Sambas Province of Kalimantan Barat, Indonesia.	
1.2.4	Telephone	(+65) 62160244	
1.2.5	Fax	(+65) 68361709	
1.2.6	E-mail	simonsiburat@wilmar.com.my	
1.2.7	Web page address	www.wilmar-international.com	
1.2.8	Management Representative who completed the application for certification	Simon Siburat (Sustainability Controller Wilmar Group)	
1.2.9	Registered as RSPO member	2-0017-05-000-00 16 th August 2005	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	1 (one) unit of Palm Oil Mill (Agronusa Investama POM) and 1 (one) unit of supply base (ANI-Sambas Estate, which consist of two Division namely Senabah and Kumpai.	
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 (North)Longitude (East)
	Agronusa Investama (ANI POM)	Village of Semanga, Sub District of Sejangkung, District of Sambas, Province of Kalimantan Barat	01°21' 25"109°30' 46"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			Latitude (North)Longitude (East)
	ANI-Sambas Estate	Village of Semanga, Sub District of Sejangkung, District of Sambas.	01°19' 20" - 01°28' 38"109°27' 42"-109°34' 33"

	Province of Kalimantan Barat		
1.5	Description of Area Statement		
1.5.1	Tenure		
	• State	7,910.93	Ha
	• Community	-	Ha
1.5.2	Area Statement		
	• Total area	7,910.93	Ha
	• Mature area	7,056.55	Ha
	• Immature area	39.06	Ha
	• Mill of ANI Senabah	4.34	Ha
	• Mill of ANI Kumpai (under construction)	13.05	Ha
	• Land clearing	18.96	Ha
	• Occupation area	127.87	Ha
	• Unplanted area	353.40	Ha
	• Road, Housing, Drainage	247.65	Ha
	• HCV	50.05	Ha
1.6	Planting Year and Cycles		
1.6.1	Age profile of planting year		
	Planting Year	Hectarage (Ha)	
		ANI-Sambas Estate	Total
	1998	528.00	528.00
	1999	1855.60	1855.60
	2000	344.78	344.78
	2001	288.00	288.00
	2005	154.10	154.10
	2006	2065.24	2065.24
	2007	725.25	725.25
	2009	932.83	932.83
	2010	53.03	53.03
	2011	30.59	30.59
	2012	79.13	79.13
	2013	39.06	39.06
	TOTAL	7,095.61	7,095.61
1.6.2	New Planting area after January 2010	148.78	Ha
1.6.3	Planting Cycle	1 st	Cycle
1.7	Description of Mill and Supply Base		
1.7.1	Description of Mill		
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)
			CPO
			Out put (tonnes)
			Extraction (%)
			Palm Kernel
			Out put (tonnes)
			Extraction (%)

	ANI POM	30	135,025.17	25,730.77	19.05	5,273.83	3.90
	<i>*Production data source from February 2015 to January 2016</i>						
1.7.2	Description of Certification Scope of Supply Base						
	Name of Estate	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)	Supplied to Mill	
						FFB (tonnes/year)	%
ANI-Sambas Estate						7,910.93	7,095.61
	TOTAL	7,910.93	7,095.61	130,629.66	18.57	119,173.78	91.49
	<i>*Production data source from February 2015 to January 2016</i>						
	<i>**8.51 % of FFB produced was sent to POM PT Fajar due to poor accessibility to PT ANI POM during flood season</i>						
1.7.3	FFB description from other source						
	Name of sources	Organization	Location	Supplied to Mill			
				FFB (tonnes/year)			
	KUD Sentama Lestari	Smallholders PT ANI (Total of member 721, Area: 729.30 Ha)	District of Sambas, Province of Kalimantan Barat	4,773.47			
	KUD Cempaka Biru	Smallholders PT ANI (Total of member 226, Area: 456.54 Ha)	District of Sambas, Province of Kalimantan Barat	2,142.25			
	Plasma Sabung	-	District of Sambas, Province of Kalimantan Barat	1,105.99			
	Latif M. A	-	District of Sambas, Province of Kalimantan Barat	1,621.81			
	Latif M. B	-	District of Sambas, Province of Kalimantan Barat	10.14			
	Ketut B	-	District of Sambas, Province of Kalimantan Barat	24.20			
	Agustinus Ngadap	-	District of Sambas, Province of Kalimantan Barat	73.96			
	Kaharudin	-	District of Sambas, Province of Kalimantan Barat	308.74			
	PT KJA	-	District of Sambas, Province of Kalimantan Barat	4,331.08			
	Rahmat H.	-	District of Sambas, Province of Kalimantan Barat	363.63			
	Uray	-	District of Sambas, Province of Kalimantan Barat	1,096.11			
	TOTAL			15,851.39			
	<i>*Source Production Data from February 2015 to January 2016</i>						
1.7.4	Product categories		FFB, CPO, PK				
1.8	Estimate Tonnage of Certified Product						
1.8.1	Past Annual Claim Certified Product		Previous Certificate Claim 22 April 2015 to 21 April 2016 (tonnes/year)		Actual certified product 22 April 2015 to 15 February 2016 (tonnes/year)		
	• FFB Production		113,590.00		106,915.70		
	• CPO Production		24,422.00		20,310.67		
	• Palm Kernel (PK) Production		5,963.00		4,106.34		

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)		
	ANI-Sambas Estate	7,910.93	7,095.61	141,200	19.90		
	TOTAL	7,910.93	7,095.61	141,200	19.90		
*Projected FFB production for April 2016 – April 2017							
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 (%)
	ANI POM	30	141,200	29,652.00	21.00	7,060	5.00
*Projected CSPO and CSPK production for April 2016 – April 2017							
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						
	No.	Management Unit	Location	Time Bound Plan		Status	
	1	PT Perkebunan Milano (SDE, BSE & MBE)	North Sumatera	2009		Certified	
	2	PT Mustika Sembuluh I	Central Kalimantan	2009		Certified	
	3	PT Kencana Sawit Indonesia	West Sumatera	2010		Certified	
	4	PT Kerry Sawit Indonesia I	Central Kalimantan	2010		Certified	
	5	PT Tania Selatan (BT & BB)	South Sumatera	2010		Certified	
	6	PT AMP Plantation	West Sumatera	2011		Certified	
	7	PT Buluh Cawang Plantation 1	South Sumatera	2012		Certified	
	8	PT Bumi Sawit Kencana	Central Kalimantan	2012		Certified	
	9	PT Gersindo Minang Plantation	West Sumatera	2012		Certified	
	10	PT Sarana Titian Permata	Central Kalimantan	2012		Certified	
	11	PT Daya Labuhan Indah-2	North Sumatera	2013		Certified	
	12	PT Mustika Sembuluh 2	Central Kalimantan	2014		Certified	
	13	PT Mentaya Sawit Mas	Central Kalimantan	2014		Certified	
	14	BBPOP (Benso Plantation)	Ghana	2014		Certified	
	15	PT Kerry Sawit Indonesia 2	Central Kalimantan	2014		Final Audit	
	16	PT Agro Palindo Sakti 1	South Sumatera	2014		Final Audit	
	17	PT Musi Banyuasin Indah	South Sumatera	2014		Final Audit	
18	PT Murini Sam Sam	Riau	2015		Final Audit		

19	PT Sinarsiak Dianpermai	Riau	2016	1 st Stage Audit
20	PT Bumi Pratama Khatulistiwa	West Kalimantan	2015	Planning
21	PT Karunia Kencana Permaisejati	Central Kalimantan	2016	Final Audit
22	PT Rimba Harapan Sakti	Central Kalimantan	2016	Final Audit
23	PT Agronusa Investama Landak	West Kalimantan	2016	Planning
24	PT Agro Palindo Sakti 2	West Kalimantan	2016	Planning
25	PT Buluh Cawang Plantation	West Kalimantan	2015	Planning
26	PT Agro Indah Persada 2	Bangko - Jambi	2016	Planning
27	PT Putra Indotropical	West Kalimantan	2016	Planning
28	PT Pratama Prosentindo	West Kalimantan	2016	Planning
29	PT Indoresins Putra Mandiri	West Kalimantan	2016	Planning
30	PT Daya Landak Plantation	West Kalimantan	2016	Planning
31	Sapi (1 + 2)	Sandakan, Sabah, Malaysia	2008	Certified
32	Sabahmas	Lahad Datu, Sabah, Malaysia	2008	Certified
33	Reka Halus	Sandakan, Sabah, Malaysia	2008	Certified
34	Saremas (1 + 2)	Miri Sarawak, Malaysia	2008	Certified
35	Terusan	Miri Sarawak, Malaysia	2009	Certified
36	Ribubonus	Telupid	2009	Certified
37	Sri Kamusan	Sugut	2010	Certified

**latest update of Time Bound Plan 2015 under WILMAR management.*

PT ANI had a scheme of Smallholders since 2010, but it not included in Wilmar time bound plan. This situation noted as **Non Conformity (NCR)No. 2016.05 with Minor category of RSPO Certification System 4.2.4.**

1.10.2	Progress of Associated Smallholders and Out growers for Certifiable Standard
	The pre-Assessment Audit (or Stage-1) had been carried for full managed smallholder PT ANI. It was targeted that The Smallholder must be RSPO certified three years after certified of ANI POM.

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-3	<p>1. Oktovianus Rusmin (Lead Auditor). Bachelor of Social and Political Sciences from Department of Anthropology, University of Hasanuddin in Makassar. Specialists in the field of Social and Cultural (Social Impact and Conflict Resolution) and HCV. Already participated in Forest Management Auditor Training (FSC Standard), ISO 14001 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 and was approved as HCV assessor by RSPO for Social Discipline Specialist. Have been involved in several palm oil certifications as Auditor and Lead Auditor. At RSPO ASA-3, he has contributed on social aspect and SCCS assessment.</p> <p>2. Naila Karima (Auditor). Bachelor of Public Health from Department of Occupational Health and Safety, Faculty of Public Health, University of Indonesia. She had experience working in private oil palm plantation companies in Indonesia. She had followed training such as ISPO Lead Auditor, awareness training the RSPO certification system, awareness training Occupational Health and Safety Management System (PP No. 50 year 2012) and Integrated Management System (OHSAS18001:2007, ISO14001:2004, and ISO 9001:2008). At RSPO ASA-3, she has contributed on occupational health, safety and manpower aspect assessment.</p> <p>3. Mohamad Amarullah (Auditor). Master of Wood science and technology from University of Putra Malaysia and Bachelor of Forestry form Bogor Agricultural University. Had six year experience as an Agronomist and Researcher in Indonesia and Malaysia. He had contributed to soil correlation and yield improvement project on peat soil in Riau. She had followed training such as ISO 17021, ISO 17065, HCV, ISO 9001:2008, Auditor ISPO, Auditor RSPO and ISO 14001:2004. At RSPO ASA-3, he has contribute on estate and mill best management practices aspect assessment.</p> <p>4. Steve Mualim (Auditor). Master in Environmental and Natural Resources Management from Bogor Agricultural University. He has worked as a freelance in several consultants in the Environmental Impact Assessment. He has followed training of Lead Auditor training ISPO, RSPO awareness, Ecological Risk Assessment, Asian Network Update and Carbon, and Climate Change Mitigation and Adaptation for Agricultural Productivity and Auditor/Lead Auditor Management System Certification (ISO 9001-2008). At RSPO ASA-3, he has contributed on environment and conservation aspect assessment.</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA-3	<p>Number of Auditors: 4 Auditors.</p> <p>Number of days for ASA-3 at site: 4 days.</p> <p>Number of working days for ASA-3 at site: 16 Working days.</p>
2.2.2	Assessment Process
ASA-3	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Agronusa Investama to the requirements of RSPO Principles and Criteria for the Production of Sustainable Palm Oil – April 25th, 2013 and RSPO Supply Chain Certification Standard for Organization Seeking or Holding Certification Adopted by the RSPO Board of Governors on November 21st, 2014 (Module E for CPO Mill).</p> <p>The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) <i>interview</i>, 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.</p> <p>Some opportunities for improvement of the results ASA-3 delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase (ASA-4).</p>

Improvement of findings from main assessment findings were observed by auditors at this **ASA-3** assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of **ASA-3**.

The assessment program please find Appendix 2

2.2.3 Locations of Assessment

ASA-3

ANI-Sambas POM

1. **Mill employee housing;** observations of housing conditions, environmental conditions (sanitation) and other supporting facilities.
2. **Central Warehouse.** The warehouse condition is clean and vents are functioning properly. The entire records of entry and exit of goods carried out by special officer.
3. **Oil Warehouse.** Observation showed that the warehouse has been equipped with hazardous symbol and each kind of chemicals are placed on pallets and available MSDS for the oil. Warehouse officer has also been equipped with PPE such as masks.
4. **Chemical Warehouse.** Observation showed that the hazardous symbols are available in accordance with the rules and officers have been equipped with PPE such as masks, safety shoes, etc.
5. **Hazardous Waste Temporary Warehouse.** Observation showed that the hazardous waste temporary warehouse has been equipped with hazardous waste symbols. There is no hazardous waste stored exceeds the permit, records of entry and exit of waste are documented, and available eye shower.
6. **Water treatment plant.** Observation showed that the flow meter is provided and functioning normally and records of water usage has been carried out by special officers routinely.
7. **Workshop.** Provided fire Extinguishers and the flow diagram of emergencies handling and First Aid box. At the time of observation, the employees who perform welding has been equipped with an adequate PPE.
8. **WWTP.** Observations show that there are nine waste ponds and there was no indication of leakage and pollution caused by the waste.
9. **FFB sorting station and loading ramp.** Observation showed that workers can explain the criteria of fruit quality, sampling methods, records and administration phases.
10. **Boiler Station.** Observation showed that the employees have been trained and be able to explain the sequence of its technical work in accordance with the procedures and responsibilities.
11. **Generator Station.** Observation showed that that the employees may explain the duties and responsibilities in accordance with the owned procedure. The employees are using an appropriate PPE.
12. **Laboratory process.** Observation showed that the employees may explain the types of tests performed and the standardized of test parameters used.

Division of Senabah

1. **Boundaries Pole:** Field visits (sampling pole in Division of Senabah: Pole 119 H, 191 A, 186 A, 189 A), the pole condition is in good condition and well maintained, and punctuation marks can be clearly read. The distance between the boundaries pole with the other is \pm 500 meters.
2. **Moratorium area in Block 76 A:** Observing the condition of the moratorium area (condition was not tilled by the company and has been marked limit).
3. **Sentakul Riparian in block 144E.** Riparian is in good condition with natural bush. There is a signboard of riparian limit in the palm tree with red paint.
4. **Land Use Title Pole 119H block 144 E.** Field observations indicate the Land Use Title Boundaries Pole is provided and maintained.
5. **Land Use Title Pole 191A block 40D.** Field observations indicate the Land Use Title Boundaries Pole is provided and maintained.
6. **Land Use Title Pole 186A block 43 C.** Field observations indicate the Land Use Title Boundaries Pole is provided and maintained.
7. **Land Use Title Pole 189A block 243 E.** Field observations indicate the Land Use Title Boundaries Pole is provided and maintained.
8. **Mak Nyiri Riparian block 32B.** Riparian is in good condition with natural bush. There is a signboard of riparian limit in the palm tree with red paint.
9. **Landfill in block 26 A.** Landfill with Open or Close system, there are no Hazardous Waste, and the location is far

- from settlements and water resources.
10. **EFB application block 26A.** Observations and Interview with field officers known that EFB application is conducted by spreading one layer with a dose of 40 tons/ha.
 11. **Block 7B, Division 1, Phase 1; Harvest.** Observations and Interview with supervisor and workers and harvesters showed that the workers have understood the technical of their works for example, the ripe fruit criteria, midrib placement, harvest techniques, pruning techniques, The use of PPE, Wage methods, premiums and penalties. The employees have known the animals which are protected and should not be hunted. Supervisor is brought First Aid box. The employees can explain the grievance mechanism through employer and worker unions.
 12. **Block 23 Division 3B, EFB Application mounding the soil with a layer of hardpan.** Observation showed that the dose and the laying technical of EFB are in accordance with owned procedures. To optimize the rooting system of oil palm in the areas with characteristics of the soil with a layer of hardpan (cemented layer), Agronomist has made trial of mounding.
 13. **Block 105A/B Division 1 Phase 1; Maintenance of circle spraying and harvesting path.** Observations and interview with the supervisor and Sprayer showed that the workers have understood and can demonstrate the technical of their work, for example, poison mixing technical, management of PPE, technical of spraying and the area that should not be sprayed, such as riparian, conservation area. The employees know the animals are protected and should not be hunted. There are no employees who are pregnant, nursing and health problems are within in the spray team. The employees get extra food every day, regular health examinations once a year and menstruation leave. Supervisor is brought first aid box. The employees can explain the mechanism of grievance through his superiors, worker unions and female committees.
 14. **Block 4B Division 1 Phase 1 Treatment of *Turnera subulata* and EFB application.** Observations showed that the dose and the laying technical of EFB are in accordance with owned procedures. *Turnera* condition is well maintained.
 15. **Block 42B Division 1 Phase 4 Fertilization.** Observations and interviews with the supervisors and Fertilizer Workers indicate that workers understand and can demonstrate a technical of work well, for example, the placement of fertilizers by type, the use of container for proper dosing, management of PPE, palm tree and the area / region should not be fertilized. Employees know the animals are protected and should not be hunted. There are no employees who are pregnant, nursing and health problems are in the team fertilizer. Employees receive regular health examinations once a year and menstruation leave. Supervisor brought First Aid box. Employees can explain the mechanism of grievance through his superiors, worker unions and female committees.
 16. **Block 40A Division 1 Phase 4 Monitoring of water management.** Observation showed that the water level height is monitored in accordance with the procedure and recorded. Drain field conditions are well maintained so that the washing water to reduce the acidity of peat ran smoothly. Subsidence pole is maintained and measurement is done periodically.
 13. **Hazardous Warehouse.** Observation showed that the hazardous symbols are available in accordance with the rules and officers have been equipped with PPE such as masks, safety shoes, etc.
 14. **Clinic of Senabah Division.** Medical waste has been managed properly, and paramedics have a certificate of Hygiene Company and Occupational Health.
 15. **Employee Housing, Phase 4.** The general condition of housing facilities are in good condition and well maintained, and has a system of sanitation and the management of household waste is good.

Division of Kumpai

1. **Boundaries Pole:** field checks (sampling stakes in Kumpai Division: Pole No. 005, 006, 007 & 008), the pole condition is in good condition and well maintained, and punctuation marks can be read clearly. The distance between the boundaries pole with the other is \pm 500 meters.
2. **Anas Riparian in block 147A.** The riparian has been bushed naturally. There is a signboard of riparian limit in the palm tree with red paint and there is a planting of *vetiver grass* in riparian.
3. **Senapit Riparian in block 075A.** The riparian has been bushed naturally. There is a signboard of riparian limit in the palm tree with red paint and there is a planting of *vetiver grass* in riparian.
4. **Block B150 Phase 5; Harvest.** Observations and Interview with supervisor and workers and harvesters showed that the workers have understood the technical of their works for example, the ripe fruit criteria, midrib placement, harvest techniques, pruning techniques, The use of PPE, Wage methods, premiums and penalties. The employees have known the animals which are protected and should not be hunted. Supervisor is brought

- First Aid box. The employees can explain the grievance mechanism through employer and worker unions.
5. **Blok 060C Phase 5; Maintenance of circle spraying and harvesting path.** Observations and interview with the supervisor and Sprayer showed that the workers have understood and can demonstrate the technical of their work, for example, poison mixing technical, management of PPE, technical of spraying and the area that should not be sprayed, such as riparian, conservation area. The employees know the animals are protected and should not be hunted. There are no employees who are pregnant, nursing and health problems are within in the spray team. The employees get extra food every day, regular health examinations once a year and menstruation leave. Supervisor is brought first aid box. The employees can explain the mechanism of grievance through his superiors, worker unions and female committees.
 6. **Blok 057 Phase 5; Fertilization.** Observations and interview with the supervisors and Fertilizer Workers indicate that workers understand and can demonstrate a technical of work well, for example, the placement of fertilizers by type, the use of container for proper dosing, the management of PPE, palm tree and the area / region should not be fertilized. Employees know the animals are protected and should not be hunted. There are no employees who are pregnant, nursing and health problems are in the team fertilizer. Employees receive regular health examinations once a year and menstruation leave. Supervisor brought First Aid box. Employees can explain the mechanism of grievance through his superiors, worker unions and female committees.
 7. **Employee Housing Kumpai Division.** Observation on employee housing facilities, clean water facilities, place of worship, and sport facilities provided by company
 8. **Fertilizer Warehouse.** Observations on the fertilizer storage and management.
 9. **Agrochemical Warehouse.** Observations on storage and management of chemicals used by the company in the form of herbicides, fungicides, pesticides and insecticides
 10. **Hazardous Waste Temporary Warehouse.** Observations on storage and hazardous waste management activities in the form of oil, dust cloth, used filter, used lamp
 11. **Workshop.** Observations on workshop activities in the form of repair and maintenance of operational vehicles and heavy equipment
 12. **Clinic.** Observations on clinical activities and interviews with paramedics such as health programs, health examinations, Maternal and child health center, and management of infectious waste.

Stakeholder

1. **Sepantai Village:** Interviews with Village Chief and some villagers. Interviews about social interaction between the village with PT Agronusa Investama, programs of CD/CSR and social and environmental impacts from the management of estate and mill.
2. **The board of KUD Sentama Lestari and KUD Cempaka Biru.** Interviews with the board of KUD related to the implementation of smallholders activity.
3. **Female Committee of PT ANI.** Interviews with the head of Female Committee related to the implementation of preventive policies on sexual harassment and protection on reproductive rights.
4. **Unit Leader of Indonesian Workers Union of PT ANI.** Interviews related to the compliance with labour legislation and workers' rights.

2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ASA-3	<p>Summary of stakeholder consultation process</p> <p>Consultation of stakeholders for PT Agronusa Investama was held by:</p> <ol style="list-style-type: none"> 1. Public Notification was carried out on 01 February 2016. 2. Public consultation meeting with local people were conducted by visit Sepantai villages at 17 February 2016. 3. Interviews the local stakeholders such as Group Leader of Cooperation Plasma Sentama Lestari dan Cempaka Biru at 18 February 2016. 4. Sent letter and questionnaire to Lembaga Gemawan (local NGO), Sawit Watch, Walhi (<i>Wahana Lingkungan Hidup Indonesia</i>) dan WWF Indonesia via email dan phone at 10 February 2016. 5. Sent letter and questionnaire to Government Institutions of Sambas District e.g. National land Agency, Environment Bodies, Forestry and Plantation Agency, and Labor Social and Transmigration Agency via email at 10 February 2016.

	Numbers of input from stakeholders were clarified by PT Agronusa Investama.
2.3.2	Stakeholder contacted
	<i>Please find appendix1</i>
2.4	Determining Next Assessment
	The next visit (ASA-4) will be determined one year after this ASA-3 (March 2017).

3.0. ASSESSMENT FINDINGS

3.1. Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Agronusa Investama POM – PT Agronusa Investama, Wilmar International, Ltd. operation consisting of one (1) mill and one (1) oil palm estates.

During the assessment, there were two (2) Nonconformities were assigned against Major Compliance Indicators; four (4) nonconformities were assigned against Minor Compliance Indicators; and five (5) opportunities for improvement were identified.

Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5. The company has already prepared and implemented the corrective actions that had been reviewed and accepted by Auditors in form of documentation evidences. Those corrective actions taken that consist of two (2) Major non-conformities had been closed out shall be verified during next assessment.

MUTUAGUNG LESTARI found that Agronusa Investama POM – PT Agronusa Investama, Wilmar International, Ltd. complied with the requirements of **RSPO Principles and Criteria for the Production of Sustainable Palm Oil (Generic Standard) – April 25th, 2013** and **RSPO Supply Chain Certification Standard for Organizations Seeking or Holding Certification Adopted by RSPO Board of Governors on November 21st, 2014 (Module E for CPO Mill)**.

Therefore MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is to be **continued**.

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
PRINCIPLE #1 COMMITMENT TO TRANSPARENCY		
1.1	Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	
	<p>The company has the SOP Providing Information to Outside Parties (Transparency) (Document No. SOP 52 / WIP-KB / (02) / 0911, Revision 02, the effective date on October 1, 2015) which explains about the mechanism of requests and responses for information from stakeholders, under the responsibility of Bina Mitra Department. SOP aim is to ensure that the company provides information in the proper and adequate language for the interests of stakeholders regarding to the environmental, social and legal relevant. The company will provide a response to the request no later than 14 days after the request received. Records of information requests are documented in the form of inbox book of PT ANI Sambas.</p> <p>The study results of incoming mail in PT ANI contained Letter No. 582/324 / BPMPPT-4/2015 dated November 24, 2015 from the Head of Investment and Integrated Licensing Services concerning the reports of measurement implementation, installation of boundaries pole, and creating a buffer zone. However, not enough evidence that the company had responded to the letter. Based on the explanation above then it becomes non conformity No. 2016.01 with Major categories 1.1.2</p> <p>Auditor Observation: April 5th 2016 The company showed Letter No. 023/BM-ANIS/EXT/III/2016 dated March 30, 2016 regarding the response to the letter from the Board of Investment and Integrated licensing Services No. 582/324/BPMPPT-4/2015 which has been accepted by the relevant agencies on April 1, 2016 in accordance with the receipt documents.</p> <p>May 23rd 2016</p>	

The Company showed document Socialization Response Procedures Flow Request Information dated April 18, 2016 submitted to the officer responsible for receiving requests for information in the form of a letter or email and recalls the response deadline is 14 days since the request for information is received. The company also shows the log book recording incoming and outgoing mail, equipped with a response date information to ensure that the deadline for responses in accordance with procedures established by the company (14 days).

Auditor Conclusion:

Based on the evidence submitted relating to corrective and preventive actions are determined by the company, non-conformity No. 2016.01 stated fulfilled.

Major 1.1.2	Status: Non-conformance NC.2014.1 with Major category	Closed
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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.

The company showed SOP of Providing Information to Outside Parties (Transparency) (Document No. SOP 52/WIP-KB/(02)/0911, Revision 02, the effective date on October 1, 2015), which aims to ensure that the management of documents are available for public, except for commercial confidentiality-protected documents or information that would impact a hazard when published. In the SOP stated that the company divides into two categories of company documents that can be accessed by all stakeholders, among others:

- a) Documents with broad access
 1. EIA Document
 2. Company Annual Reports
 3. Company General Policies
 4. Licensing includes Land Use Title and Decree of Land Use Title Determination, as well as the operational licenses of plantation business activities
 5. Business activity reports of palm oil plantation industry
 6. Map of the plantation business location
 7. Ordinances / operational procedures of estate and mill
 8. Organizational structure of the company
 9. Reports of environmental governance and social that includes reports of HCV, SIA, environmental and OHS, CSR and CDP
 10. Magazine or company bulletins
 11. Reports of the position and the amount of labor
 12. Land use data (land use)
 13. The identification results of environmental impact aspect and risk of OHS
 14. Programs of OHS and environment
 15. General summary about the ratings of RSPO/ISPO Certification
 16. Plans for continuous improvement
 17. Plans for the reduction and prevention of pollution
- b) Documents that can be accessed with the approval of General Manager
 1. Deed of Incorporation and deed of the company amendment
 2. The company's financial reports
 3. Wage policy of staff / employee
 4. The identity of the shareholders and the company boards
 5. Identification of the operational leadership of staff and employees
 6. A list of the company's assets
 7. Payment data of land acquisition
 8. Complain and grievance
 9. Distribution map of endangered animals in the conservation area
 10. The financial statements of partnership development and management of smallholdings
 11. Donations from third party.

	Status: Comply	
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1.3

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

The company code of conduct contained in the document No. 044/DIR-KP/XII/ 2015 dated December 15, 2015 ratified by the Sustainability Division Head, HRGA Corporate Head and Country Head. Code of conduct defined as a guide in implementing the tasks based on the ethical values that are well-behaved in accordance with the applicable regulations

and legislation. The code of conduct has three principles, namely to avoid conflicts of interest, to avoid abuse of authority / position and to ensure the confidentiality of information that can be obtained through the company's operations, either for personal benefit or for any other purpose other than the interests of the company.

Socialization of code of conducts and human rights of the company is conducted to all internal parties and external companies (third parties). This is evidenced through several documents for example, Minutes of RSPO socialization and company policies of PT Agronusa Investama Sambas (PT ANIS) to external parties of the company consisting of administrators of PT ANIS smallholdings, Sentama Lestari, Cempaka Biru smallholdings and Anugrah Semaro smallholdings dated February 4, 2015 and Socialization News event of code of conducts and human rights dated August 19, 2015 conducted by the Personal General Affair (PGA). News events ratified by the Senior Estate Manager and Environment, Health and Safety (EHS) Manager. Socialization is given to a company official consists of supervisor and 21 maintenance employees Phase 5.

Based on interviews with employees in the field, workers know and understand the company's code of conducts.

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.

The company has shown some evidence of compliance with laws and regulations, for example relating to the field of Occupational Health and Safety (OHS), while evidence of regulatory compliance can be demonstrated by the management unit (POM and Estate), among others:

- Welder Certificate No. S.590/JL/PNK3/V/14 issued on May 8, 2014 welder Class II in accordance with Regulation of Labor and Transmigration Ministry No. 02 Year 1982.
- Certificate of Electrical OHS Technician Registration No. 10783/TK3-LIST/X/ 2015-P0 dated October 23, 2015 in accordance with the Regulation of Labor Ministry No. 12 Year 2015.
- Provision of PPE according to the risk of the work on the operational activities of the POM and Estate in accordance with Regulation of Labor and Transmigration Ministry No. 08 Year 2010. Observation results of spraying activities in Block 06OC Phase 5 Kumpai Division known that the workers are using PPE in the form of masks, goggles, apron, cloth and rubber gloves, boots.

The study on the procedure and application of best management practices in the field shows the company has followed the rules in Indonesia, for example land clearing without burning, the use of certified seed and do not use pesticide with active ingredient of *paraquat*.

Compliance with legal requirements regarding to the environment is evidenced by the company's own environmental official document that has been approved by the forestry minister in 2001, effluent disposal permit by decision from Sambas Regent in 2011, as well as permission of Hazardous Waste Temporary Warehouse for POM of ANI Sambas and Kumpai Estate.

The Company has a mechanism for updating the rules which are used. Each revision is made the official report and ratified by the Document Control section, Estate Manager and Chairman of the Company. The updates and circulation of a list of rules is the responsibility of the Document Control section which is directly responsible to the Assistant General Manager.

The company showed news event on February 13, 2016 which described that has been done Revision 10 (effective date on November 1, 2015) Law Register of estate (FRM 02/SOP 02/WIP-KB/6010), Law Register of Environment (FRM 02/SOP 02/WIP-KB/6010), Law Register of Labor (FRM 02/SOP 02/WIP-KB/6010), and Law Register of OHS (FRM 02/SOP 02/WIP-KB/6010). The list of regulations consist of the Laws, Government Regulation, Presidential Regulation, Minister Regulation and Minister Decree.

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.

Land Use Title Certificate of PT Agronusa Investama is in the process of maintenance follow-up. This is to conform to the policies issued after the publication of the Location Permit. Records of the legality of the possession and cultivation of land owned is as follows:

a. Evidence of Land Legality Management Progress:

- Letter of Sambas Regent No.500/074/Ekon, dated February 4, 2005, about the transfer of the area management as referred in the location permit on behalf of PT Bantan Eka Jaya No. 04/IL-BPN/SBS/1999 dated August 26, 1999 to PT Agronusa Investama.
- Location Permit of Palm Oil Plantation, based on the:
 - Decree of Sambas Regent No. 61 Year 2005, Dated April 7, 2005, covering an area of 12,000 hectares.
 - Decree of Sambas Regent No. 46 Year 2006, Dated March 14, 2006, about the revision of location permit on behalf of PT. Agronusa Investama covering an area of 12,000 hectares became 12,500 hectares (Revision I).
 - Decree of Sambas Regent No. 269 Year 2009, Dated June 30, 2009, about the extension of location permit with the extensive changes from 12,500 hectares became 12.440 hectares. Valid until March 14, 2010 (Revision II).
- Application Submitting of Measurement picture: measurement results in 2005 by Central National Land Agency covering an area of $\pm 10,739$ hectares from the Location Permit covering an area of $\pm 12,000$ hectares.
- Survey of Land Use on 8 to 10 October 2007 by the Regional Office of National Land Agency in West Kalimantan Province based on the Request of Technical Considerations of Land Use in PT ANI No. 086 / ANI-BM / Ext / IX-2007 dated September 10, 2007 on PT ANI Location Permit No. 46 Year 2006 covering an area of $\pm 12,500$ hectares. Size of the Land Use and Utilization is $\pm 11,622.16$ hectares.
- Pole installation: temporary pole in 2007 and the installation of permanent pole in 2009 after resolving the land issues.
- Implementation of the Revised Measurement in 2005: into a field map covering an area of $\pm 9,558$ hectares.
- Decree of the Head of Forest Area Consolidation Center (BPKH) Region III No. S.160/VII/BPKH-II/2009, dated April 24, 2009 about the Status of Region Location Permit PT Agronusa Investama covering an area of 12,440 hectares, which all located in the area of other uses (APL) and not within the forest area.
- Submission of Revised Measurement picture and Land Measurement Addition No. 133/ANI-BM/HGU/XII/09 dated December 28, 2009 from the measurement picture covering an area of $\pm 9,558$ hectares to $\pm 8,040$ hectares to the Regional Office of National Land Agency, West Kalimantan Province
- Revised Measurement of Measuring picture conducted on June 2011, supported by Sambas Regent Decree No. 582/257/3-BPMPPT recommend to National Land Agency of Republic of Indonesia to be able to continue the maintenance process until the Land Use Title is published to PT ANI.
- Plot Map, No. 072-14.02-2011 (Issued on August 16, 2011), based on the news events of the Settlement Expose of Cadastral Measurement from National Land Agency of Republic of Indonesia, dated August 12, 2012, and News Event of plot Map receipts in PT Agronusa Investama No: 344/BA/DPB2TR/XII/2011. (Land Use Title Certificate still in the process).
- Session of Land - B Examination Committee for the acquisition of the Land Use Title on behalf of PT. Agronusa Investama which took place on February 2013. The session results stated that the land for the estate that can be processed into Land Use Title is an area of $\pm 7,000.12$ hectares from the petitioned spacious covering an area of $\pm 7,910.33$ hectares
- Letter from National Land Agency of Indonesia Regional office of West Kalimantan Province to the President Director of PT Agronusa Investama (No. 505/9.61/III/2013, dated March 22, 2013, Subject: Request for Land Use Title of PT Agronusa Investama on behalf of the land covering an area of 7,910.929 hectares, located in Sambas, West Kalimantan Province. The letter contains a description of some of the things that must be followed by PT Agronusa Investama as a condition for the issuance of Land Use Title Certificates that had been petitioned to the National Land Agency.
- Land Use Title maintenance constraints emerged in 2014 that is the issuance of the Minister of Forestry Decree No: 6018/II-Menhut-VII/PSDH/2013 dated November 13, 2013 which showed that the area of PT. ANI is included in the moratorium area of granting new licenses.

- In this regard, PT ANI has submitted an objection letter to the Minister of Forestry with Letter No. 015 / ANI-M / HTN / III / 2014 dated March 25, 2014. Based on the communication between the company and the Forest Service of West Kalimantan Province, concluded that the objection petition of PT Agronusa Investama will be entered to the implementation process of Revised Moratorium which is expected in November 2014.
- Letter from the Director of PT Agronusa Investama to the Minister of Forestry of Indonesia, cq. General Director of Forestry Planning (Nor: 016 / ANI-BM / HTN / III / 2014, dated March 25, 2014), Subject: Request for Reconsideration of Forestry Ministerial Decree No. 6018/IMenhut-VII/PSDH/2013 dated November 13, 2013 on the status of moratorium on oil palm plantations of PT Agronusa Investama in Sambas Regency.
- Letter from the Director of PT Agronusa Investama to the Head of Regional Office of National Land Agency (BPN) of West Kalimantan Province (No: 054/ANI-BM/HGU/IX/2014, dated September 22, 2014), Regarding: Application for Plot Revision on behalf of PT Agronusa Investama
- Letter from the Director of PT Agronusa Investama to the Head of Research and Development of Agricultural Land Resources cq. Director of Inventory and Forest Resources Monitoring, General Directorate Planner, Ministry of Forestry Republic of Indonesia (No: 014/ANI-BM/I HN/1/2016, dated January 11, 2016), regarding: Request for Peat lands Survey.

b. Land Management Legality

- Plantation Business Permit (IUP) based on the Decree from Sambas Regent No. 37 Year 2005, dated March 10, 2005, about granting the Planting Business Permit (IUP) to PT. Agronusa Investama covering an area of 12,500 in the areas of 14,000 hectares.
- Plantation Business Permit changes based on Sambas Regent Decree No. 372 Year 2008, dated December 19, 2008, about the amendment of Sambas Regent Decree covering an area of 12,500 in the area of 14,000 hectares and palm oil processing mill with a capacity of 60 Tons of FFB / Hour.

PT Agronusa Investama has had Plot Map No. 072-14.02-2011 issued by National Land Agency, dated August 16, 2011. Based on this, the company has put up the boundaries pole in the field. From the monitoring document of boundaries pole, it is known that there are 82 poles in Kumpai Division and 85 poles in Senabah Division. Maintenance of pole is based on the SOP number 001/SOP/GIS/2014 about the Installation and Monitoring of Boundaries Pole. The SOP describes the three-monthly monitoring schedule and repairing of lost pole in each period of 3 months.

A field visit to check the boundaries pole, among others in Senabah Division (pole 119 H, 191 A, 186 A and 189 A) and in Kumpai Division (pole 008, 007, 006 & 005), it appears that the condition of the pole is in good condition and the signs can be read clearly.

The company keeps all evidence of the land issues completion records in the past. Against the land dispute that have occurred, provided evidence of the dispute settlement which can be accepted by all parties, for example:

- Settlement of land disputes with the communities of Sajingan Kecil Hutment, Semanga Village, Kumpai Division in 2008 through consultation and compensation.
- Settlement of disputes with Beringin Village Community, Sajad District of Sambas Regency on September 22, 2008.
- Records of dispute settlement with the communities of Senabah Hutment, Semanga Village, Sejangkung District of Sambas Regency in 2008 has been resolved through negotiations and payment of compensation.

Based on the verification of documents and interviews with relevant staff (Staff of Legal Document) at the time of ASA-3 implementation, obtained the information that there were no cases of land disputes happened with the communities or other parties. From the results of public consultation in the village of Sepantai and Cooperative Board of Sentama Lestari, Beringin Village, Cempaka Biru Village and Semanga Village also known that at this time there are no issues related to the land ownership disputes between PT Agronusa Investama with the parties.

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 the document of HCV Identification report in oil palm plantations of PT Agronusa Investama, not found the region in the control or management based on the indigenous rights in the area of oil palm plantations of PT Agronusa

Investama. Sources of land acquisition from this company is derived from the state land (as evidenced by the issuance of Plot Map No: 072-14.02-2011 covering an area of $\pm 7,910.929$ hectares, dated August 16, 2011) and most of the communities arable land that have been made the compensation process. The process for resolving the communities land release conducted in 2008, involving related parties. The process of compensation has been completed in 2008.

The company has archived all documents related to the process of land compensation that has ever done. The document is presented in the Indonesian language that is easily understood by the parties, including the amount of compensation that is based on the rules (standards) as determined by the local government (Compensation of crops). It has been shown an example of the process of settlement of land compensation, for example Statement of Land Release Agreement which entered the Land Administration of Satai Hutment, Sepantai village, Sejangkung District, dated September 22, 2008. Covering an area of ± 170 hectares in the measuring image of Land Use Title Plan of PT Agronusa Investama which is an administrative areas of Satai hutment, Sepantai Village with boundaries: North (Measuring image of Land Use Title plan); Western (State Land of Satai Hutment Region); East (State Land of Satai Hutment Region); South (Measuring image of Land Use Title plan). Known that the statement is made and signed by the parties, among others: Village Chief of Sepantai, Member of the Representative Board of Sepantai village, Village Chief of Satai, Sub District Head of Sejangkung and Manager of PT Agronusa Investama. The statement letter has been recorded and registered on May 1, 2009 by Notary on behalf of HARDIANSYAH, SH No. 35/DAFTAR/V/2009.

Based on interviews with relevant staff (Staff of Legal Document) at the time of ASA 03, obtained the information that there are no oil palm plantation area of PT Agronusa Investama which is in the possession of the land rights. Results from public consultation in Sepantai village and Sentama Lestari cooperative management in the village of Beringin, Cempaka Biru and Semanga is also known that there are no areas around the company which is in the traditional rights.

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.

The company owns and can show the documents Projections from 2015 until 2020 which outlines the budget and projections of some parameters of production activity in the Estate and Mill. Discussion and elaboration of projection details are separated based on the financial aspects, statement area, Crop Estate and Mill, the cost of production for Estate and Mill, processed FFB, plantation development expenditure for Estate and Mill, capital expenditure and sustainability implementation cost. Projection of annual work plans and long-term five-yearly evaluated annually based on the actual conditions of the current year. Each projection document is ratified by the Assistant General Manager (AGM). To ensure the production of FFB, CPO, OER and other parameters in accordance with the work plan that is owned, management unit conducts fertilization, harvesting, transportation, and grading in accordance with owned SOP. In addition the management unit has evaluated the work recorded on a monthly and annual report.

The company can show the document of replanting area program and replanting plan area maps with a scale of 1:50,000 dated September 3, 2015. The document is equipped with the data of plants planting year, Block locations, and the yield per hectare from 2013 until July 2015, soil types and planting year will be carried out replanting. Replanting activities will be carried out in blocks with planting year 1998 and 1999, with the production of FFB is under 20 tons / hectare / year. Based on the document known that four blocks with planting year of 1998 will be replanted in the year of 2017 to 2019 with a total area of 439.20 ha and eighteen blocks with planting year of 1999 will be replanted in the year of 2017 to 2020 with a total area of 1,543.36 ha. The blocks that will be replanted generally produce FFB 8 to 12 tons / ha / year.

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.

Oil palm cultivation procedures contained in the document of Agronomy Manual Reference and palm oil SOP in 2015 which was approved by the Group Head of Plantation. SOP of oil palm cultivation among others, the survey of pre land clearing, land assessment and land clearing, practice of palm oil nurseries, seed of *DxP Tenera* and *planlets clonal* oil palm, land clearing and land preparing in the undulating area, steep, swampy and low-lying, planting and treatment of

Legume cover crop (LCC), the planting of oil palm which involved planting and insertion, density and pattern of planting, care and maintenance of oil palm in the Immature Plant, Mature Plant and technical of fertilization, harvesting fresh fruit bunches (FFB), plant protection - control of pests and diseases, replanting the oil palm, empty fruit bunches mulch (EFB), quantitative agro-management system (QAMS) and the technique of thinning of oil palm. Meanwhile, the procedures related to the processing of palm oil contained in the document of mill SOP that include the admission of FFB, the admission of FFB from outside, the scale operations, sorting station, loading ramp station, kernel station, purifier machine, steam turbines, boilers, clarification station, decanter machine, water treatment plant, boiler ash cleaning, main Mill panel, continuous sterilizer system and logistic (dispatch of CPO and PK). SOP Master list of mill and estate saved by Document Control Section. Any revision of the SOP is controlled by a special staff that ensures that each management unit stores the same version in Indonesian language. Based on the visit to the mill and estate unit, known that each unit has a SOP document related to its field with the latest version.

Results of Observations and interviews with mill workers from a loading ramp station up to the dispatch of CPO and PK as well as observations and interviews with estate workers for the activities of harvest, fertilization, maintenance, water management, and maintenance of beneficial plant in the Division of Senabah and Kumpai, it can be concluded that the workers can explain the technical of job properly in accordance with established procedures. For example, sorting officers can explain the criteria for FFB quality, administrative record stages and demonstrate according to the SOP of FFB admission.

In keeping the consistent of SOP implementation, the company has a mechanism for internal examination regularly, for example Estate monthly report and daily production statement ratified by Mill Manager, a daily report of FFB grading, document of daily maintenance books, daily reports of Quantitative Agro Management System (QAMS) census, the audit report of System Development Control (SDC) every three months and internal audit reports of RSPO and ISPO which are scheduled twice a year. Each report is evaluated and equipped with a deadline of correction and PIC of corrective actions. In maintaining and improving the employees competence, the company held a training appropriate to the job position, for example based on the training and socialization program document in 2015, has conducted training of fertilization on January 21, 2015 and 16 to 19 October 2015, the training of spraying and agrochemical handling on 18 to 20 February 2015 and 14 to 15 August 2016 and the socialization of oil palm cultivation to smallholdings on November 20, 2015. The minutes of training ratified by EHS Manager and Senior Estate Manager. Photo documentation, training materials and attendance list attached with the minutes. Training is given by people who have the competence or the head of the relevant section.

To keep the process running smoothly, mill management unit recorded CPO and PK production parameters every day and recapitulated every month in the document of Daily Production Statement of PT ANIS POM signed by logistic section, Head of Administrator and Mill Manager. The parameters were noted among others received and processed FFB, the production of CPO and PK, Extraction rates, quality of CPO (DOBI, Dirt, FFA and Moisture), Dispatch of CPO and PK, CPO and Kernel stock, other stocks (ash, EFB, fiber and shell), running hours, throughput, pressing throughput, utilities (diesel, biodiesel, electricity, water and CaCO_3), production losses and received FFB per hour.

Mill and Estate Unit have been conducting monitoring of cultivation activities and processing of palm oil. Monitoring results that do not meet the criteria will be analyzed to look for the root cause of the problems and its corrective actions. Monitoring and evaluation mechanism is recorded, documented, maintained and provided with reasonable. For example, in the records of daily production on January 30, 2016 stated that POM began to operate at 12.30 because of waiting the FFB from the estate and mill throughput is not reached because the polishing drum is clogged. Related to this, immediate corrective action was held on Sunday, January 31, 2016 at 07.00 to 17.00has implemented improvements including replacing the airlock fiber cyclone, installing cyclone, replacing the underflow pipe recovery tank, repairing the fuel feeding conveyor and repairing the stew scrapper No. 2. Then, in the audit reports of system development control (SDC) every three months, for example in the document SDC No. 010/SDC/Reg Kalimantan 1/IX/2015 for the visit on September 28 to October 10, 2015 found the use of Delivery Order Letter form not sequential numbering. This is because the making of Delivery Order Letter is done in several places by different clerks, lack of supervision and coordination between Estate and mill PIC. The corrective actions taken are re-socialization of SOP No. 13.2 about the numbering and recording of Delivery Order Letter in the Estate and mill and manufacture of Delivery Order Letter is concentrated in one place.

The company can show the list of processed FFB suppliers in ANI POM and classify them by their status within the RSPO certification system. FFB suppliers from other sources, aside from the two cooperatives that have been partnered through Collective Labor Agreement of smallholdings management, there are also other FFB suppliers, namely from another oil palm plantation companies and individual suppliers. Procedures related to the cooperation between PT ANIS with suppliers contained in the document of Collective Labor Agreements of FFB Buy and Sell. The collective labor agreements are described among others, the understanding/terms in the agreement, the basic agreement and FFB delivery administration, FFB quality standards which are bought and sold, sorting of FFB, FFB admissions by the supplier, FFB price and FFB payment from the company to the supplier, term of the agreement, the suppliers guarantees that the FFB is legal, environmental aspects and OHS, ethics/norms in implementing the agreement, force majeure, dispute resolution, the amended agreement and other conditions. The document study results showed that the point of FFB purchase contained in the collective labor agreement is in accordance with the SOP No. 001/TBS-SOP/VIII/2015 about the purchase of FFB. Implementation of the procedures contained in the Collective Labor Agreement is evidenced, among others, the mill returns to the suppliers for each FFB that do not meet the standards for FFB criteria and cutting the FFB tonnage that shipped. Records of rejected FFB contained in the form of daily fruit sorting and recapitulated in the book/journal of FFB grading sample.

Price fixing of FFB from smallholdings according to the price set by the Plantation Agency, published in the meeting minutes of the determination of K index and the price of FFB production from West Kalimantan planters. FFB prices are set based on the age of the plants. For example, the minutes in January 2016 decided that the FFB price derived from Mature Plant with aged 10 to 20 years is IDR 1,230.82 / kg. Payment proof document of FFB to smallholdings showed in accordance with the meeting minutes of the K index determination and the price of FFB production from West Kalimantan planters.

Based on the description above, it can be concluded that the mill and estate unit can show sufficient evidence that the activities of monitoring and implementation of each action has been recorded, maintained and provided with reasonable.

Status: Comply

4.2

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

SOP owned by the company has set up several technical related to the fertility management, among others: clearing and preparation of land in the area of undulating, steep, swampy and low-lying, planting and maintenance of legume cover crops (LCC), care and maintenance of oil palm in Immature Plant, Mature Plant and technical of fertilizing and mulching application of empty fruit bunches (EFB). Agronomy Manual Reference Chapter 3 about fertilization of oil palm stated that the type of fertilizer, the amount and frequency of application was made based on the Agronomist recommendation by considering the results of structure analysis and the nutrient status on the palm tree. Leaf sampling carried out every year and the ground once every five years as a consideration in the calculation of the annual fertilizer recommendation. Sampling, analysis and calculation of annual fertilizer recommendation conducted by the research and development (R & D) EMU laboratory of Wilmar International Plantation. The parameters tested in soil analysis include pH, C organic, total N, P Bray, total P, Exchange kation (K, Mg, Ca, and Na), CEC and texture. While the parameters tested in the leaf analysis include dry weight of macro elements (N, P, K, Mg and Ca) and micro (B, Cu, Zn and Fe) needed by the plants.

The document study results of the realization of fertilization in 2015 showed that the program of NPK fertilizer super K, MOP, Borate, Urea, FeSO₄, ZnSO₄ and ZA has met the program and applied timely. Some fertilizers are applied exceed the program for corrective actions, several areas are identified to be corrected its nutrients status. Fertilizers that do not meet the program caused by the delay of the fertilizer delivery or replaced the kind of fertilizer, based on the existing stock in the warehouse. Based on interviews with fertilizers in Senabah and Kumpai Division, it is known that workers can explain and demonstrate the job in accordance with the procedures, has known the areas and palm trees that should not be fostered, among other riparian areas and abnormal palm trees.

To increase soil organic content, the company carries out the application of EFB and recycling of other nutrients such as laying the pruned frond (midrib) on the inter-row. Based on the document of program and realization report of EFB in 2015, it is known that since January until December 2015 have been applied EFB in 17 blocks with a dose of 40 tons / ha / year. Every block was applied for six times a year. Based on the field visits to Block 4B Division 1 Phase 1 Senabah

Estate known that EFB applications are in accordance with owned SOP. Some estate unit actions which aims to maintain and improve the soil fertility based on the field visits among others, the use of soft weeds as land cover, such as *Neprolephis* sp. in the inter-row, carry out selective weeding so that the condition of legumes (*Mucuna*) are maintained, implement the monitoring of erosion and monitoring of peat subsidence and monitoring of peat groundwater levels, taking care field drain in the peat lands so that the soil acidity subtraction process through leaching is running smoothly.

PT ANI does not conduct the effluent application to the land. Effluent from WWTP POM is discharge into water bodies after its quality meets the standards set by regulations. For waste disposal, provided permission through Regent Decree no. 183 Year 2011 about the Granting Permission of Effluent disposal to the water or Water Resources to PT. Agronusa Investama dated June 6, 2011 which is valid for five years. Periodic testing of effluent quality has been carried out every month. The test results of effluent in the period of October to December 2015 showed that all parameters are still appropriate with the quality standard of effluent discharges into water bodies.

Based on the description above, it can be concluded that the company has practices to maintain optimum soil fertility based on the characteristics of the soil.

Status: Comply

4.3

Practices minimize and control erosion and degradation of soils.

The company can show the vulnerable soil maps with adequate scale, among others soil map of semi-detailed soil survey results on May 2008 conducted by Param Agricultural Soil Survey Sdn. Bhd. With a scale of 1: 50,000 and 1: 25,000, peat zoning map in Senabah Division on November 10, 2012 with a scale of 1: 37,000 and peat zoning map in Kumpai Estate Division on November 10, 2012 with a scale of 1: 43,000 and topographic maps with a scale of 1: 80,000 dated October 30, 2012. Based on the study of these maps, it can be conclude that the vulnerable region in the operational area of the company consists of sandy soil, land with a slope of 12 to 40% and peat soil.

The study on topographic maps on October 30, 2012 showed that the company did not have land with a slope more than 40% (steep). In general, topography is dominated by flat slope to undulating grade (0 to 6%). However, the area with slope of 25 to 40% is made a soil and water conservation efforts that consists of making terracing, monitoring of erosion through the installation of erosion pole, planting *vetiver grass* in the slope area, planting LCC (*Mucuna* sp.), the ban board on spraying against LCC and *vetiver grass*, technique and the selection of the fertilizer types and arrangement of midrib in one way contour. Based on the results of field visits known that the strategy of cultivation on the slopes area above have been implemented, monitored, evaluated and recorded in accordance with owned SOP. Parameters of erosion rate are reported in the Environmental Management Plan / Environmental Monitoring Plan every semester.

The company can show the implementation documents of supervisor road maintenance and Road Maintenance Program, for example, for plan and realization during 2015 stated that the maintenance was carried out once a year gradually. The document is ratified by Document Control and Senior Estate Manager. Road maintenance employees stated that the action is taken in road maintenance among others grading, backfilling by rocks and soil and matting on peat soil. Based on field observations into blocks visited in Kumpai Division (Block B 150 Phase 5 and Block B 60C Phase 5) and Senabah Division (Block B7 and Block 105), it appears that the road condition traversed is in good condition and well maintained.

In order to reduce the rate of peat subsidence, the company carries out water management activities as outlined in the SOP No. SA 02 / WIP-KB / 0/2010 about the management of peat areas. The company has been managing and monitoring the peat water level ranging from 50 to 60 cm. In the water management activities, monitoring of sandbag / weirs and groundwater level measurements are carried out every day and monitoring of subsidence pole held every six months. Recapitulation of measurement contained in the document of Water Level Monitoring in Peat Area and ratified by the Document Control and EHS Manager. Based on a visit to the peat subsidence pole in Block 40A Division 1 Phase 4 of Senabah Estate and its subsidence monitoring records, it can be concluded that the subsidence rate on average over five years of measurement is equal to 4 cm / year. During the rainy season, conducted control of sandbag so that the ground water level is set at a height of 50 cm. Monitoring reports is equipped with the maps of subsidence pole that are installed at three locations based on the criteria of the peat depth and the monitoring location maps of water level

and sandbag / weirs.

Based on the replanting program document on September 3, 2015, replanting activities will begin in 2017 for planting year blocks of 1998 and 1999 with the production numbers below 20 tons / ha / year. Assessment of peat lands drained Level is adopted during the monitoring and measurement of the subsidence and water level which were conducted regularly since 2011.

Assessment of the soil suitability level, drain ability assessment and strategies for planting oil palm in the company peat lands have been outlined in the report of soil survey conducted by Param Agricultural Soil Survey Sdn. Bhd. in 2008. The results of the report analysis stated that the peat which is located in the north of Senabah Estate in the rainy season especially in low-lying areas are vulnerable to be flooded so it is necessary to conduct water management by making the drainage system to control the water table. In soil survey report, peat soils are grouped into the soil type D with limiting factors, among others, variations in the peat depth (shallow, medium and deep), very poor drainage, low fertility levels and trace elements Cu, Zn, and B. Improvement efforts which are recommended for input management among others to apply water management, good fertilizer program and carry out monitoring of trace element levels.

Vulnerable land management strategies contained in the operational areas of PT ANIS contained in the soil survey report. Realization of management strategy against vulnerable soil can also be found in the company budget documents among others, the allocation of EFB application activity, upkeep of drains (main delisting, collection and field drains) and fertilizer recommendations are made based on the soil characteristics and the test results of soil analysis. During the visits to the Division of Senabah and Kumpai, it can be concluded several efforts made by plantation management in the context of vulnerable land management among others, improving the condition of soil nutrient status by increasing the soil organic matter through recycling methods of biomass consisting of EFB application, planting *Mucuna* and its treatment through selective weeding and frond stacking and implement the water management in peat soil by installing the field drain and keep the water level in the average of 50 to 60 cm.

Based on the description above, it can be concluded that the company has made efforts to implement the practices to minimize erosion and degradation of soil based on its soil characteristics.

Status: Comply

4.4

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

Activities to maintain the quality and availability of surface water for nucleus estate are conducted based on the management procedures of riparian with document No. SOP 17/WIP-KB/(01)/1015 in 2015. This procedure describes about the determination of the riparian width, the installation of riparian signs and the prohibition of chemical applications in the riparian area and refers to the regulations. In essence, the company is committed to protect the area with a certain slope and also river flow in accordance with Presidential Decree No. 32 Year 1990.

Management plans related to the surface water management contained in the HCV management plan in 2015 to 2020. The management implementation to keep the quality of surface water which has been conducted by the company is well documented, for example:

- Field visits in Mak Nyirih Riparian in block 32 B Senabah Estate and Anas riparian in block 147B Kumpai Estate showed that the company consistently safeguard the flow of water through the installation of riparian sign board, Manufacture the riparian border: riparian boundaries pole in the form of red paint pole.
- Field observations in WWTP of ANI Sambas POM showed that there is no indication of leakage in WWTP. Periodic testing of effluent quality has been carried out every month. The test results of effluent in the period of October to December 2015 show that all parameters are still appropriate with the quality standard of effluent discharges into water bodies.
- Monitoring the efficiency of the surface water usage for ANI Sambas POM. Results of the water usage monitoring for the processing activities in the period of July to December 2015 showed the water usage efficiency is still below the POM budget (budget of water usage with an average of 1.54 m³/ton of FFB) and field observations in the WTP of ANI Sambas POM showed the water usage has been monitored every day with the flow meter which is functioning normally.

Periodic testing of surface water quality is done to the Anas River, Senapit River, Sentakul River and Mak Nyirih River.

Results of regular testing for the second semester of 2015 showed that all test parameters are in compliance with the surface water quality standards. Results of monitoring the use of water for processing activities in the period of July to December 2015 showed the water usage efficiency is still below the POM budget (budget of the water consumption with an average of 1.54 m³ / ton of FFB)

Status: Comply

4.5

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

The detection and monitoring of pests and diseases carried by Enumerator officers regularly each month with the technical census of several pest types. Pest and disease control programs contained in the annual budget and long-term budget up to five years. The company can also show the program document of pest and diseases census detection of oil palm plantations in Senabah Division and Kumpai Estate in 2015 signed by Agronomy Manager. Census is carried out to calculate the attack value of the bagworms, Nettle Caterpillar, caterpillars, Rats, termites, *ganoderma*, *Oryctes* and wild boar. In the summary document of caterpillars and nettle caterpillars census stated the classification of pest attacks rate. For example, documents in November 2015 stated that the attack rate both types of these pests in Blocks 002A, 101A-C and 105A-D Senabah Division is heavy so it was decided to implement the control by fogging on November 10, to December 10, 2015. Then, based on the census of rat pest in Kumpai Division in 2015, is known the attack rates are quite high ranging between 10 to 50%. This led to the use of rat poison Tikumin increased to 16 times more from last year. The estate management stated that the local snake has not been effective in controlling the rat population. Responding to this, the company makes and can show the owl cage manufacturing program in 2016 will begin on March 2016 for the entire Phase in Senabah and Kumpai Division. Monitoring of owl populations was included to the rat control program in 2016.

Based on the field visits, it can be concluded that the control of nettle caterpillars and bagworms are focused by using biological methods that is by planting and maintaining beneficial plant (*Turnera subulata*, *Antigonon leptopus* and *Cassia cobanensis*). To avoid the emergence of resistance in leaf eater caterpillars and to prevent the use of prophylactic, using substitute pesticide products which has particularly targeted the same. For example, based on the documents list of pesticide use, pesticide with Bravo 50 EC brand can be substituted with *Cymbush*, which have the same active ingredient of *Sipermethrin*.

To maintain and improve the competence of employees, the company held a training appropriate to their work positions, among others, based on the documents of training program and socialization in 2015, has been implemented spray training and handling of agrochemical on 18 to 20 February 2015 and 14 to 15 August 2016 in Blocks 7A and 7C. The material provided in training, among others, about the dosage and the correct way in spraying, the target being sprayed, the use of PPE and prohibited areas to be sprayed. The Minutes of training ratified by EHS Manager and Senior Estate Manager. Photo documentation, training materials and attendance list are attached to the minutes. Training is given by people who have the competence or the head of the relevant section. Based on the visits and interviews with sprayers in Block 105 A / B Division 1, Phase 1 Senabah Division and Block B060 C Phase 5 Kumpai Division, workers claimed to have received training of spraying technique and the importance of using PPE while working in the field. Workers also stated that the training is conducted every year and the last time was held on August 14 to 15, 2015. The Company can demonstrate the training materials and photo documentation during the activity. Workers can demonstrate their job and understand the health and environmental aspects.

Status: Comply

4.6

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

In the Agronomy Manual Reference and SOP in oil palm plantations in 2015 stated that the monitoring measures and the use of pesticides must meet the safety and health rules and refers to the OHS SOP for safe guidance in the work. The use of pesticides in controlling the populations of pests and diseases was made based on the recommendation of Agronomist and census results conducted periodically. For example, in the summary document of caterpillars and nettle caterpillars census stated in November 2015 the classification level of both pests attack in Blocks 002A, 101A-C and 105A-D Senabah Division is heavy so it was decided to implement control by fogging on November 10, to December 10, 2015. As another example, based on the census of rat pest attack in Kumpai Division in 2015, is known the attack rates are quite high ranging between 10 to 50%. This led to the use of rat poison *Tikumin* increased 16 times more from last year. The study on document usage data of agrochemical can be concluded that the company has separated the use of

pesticides based on the type of work, for example, to circle and path spraying, the pesticide use is *Glisat 480 SL*, to control bagworms, the pesticide use is *Capture 100 EC* and to control voluntary oil palms (VOPs), the pesticide use is *Starlon 665 EC*. The Company has consistently every month to monitor the use of active ingredient per hectare. Based on the reports on the use of pesticides and interviews with spray supervisor in Block 105 A/B Division 1 Phase 1 Senabah Division and Block B 060C Phase 5 Kumpai Division, doses of pesticide used is in accordance with the recommendations set by the manufacturer.

To avoid the emergence of resistance in leaf eater caterpillars and to prevent prophylactic use, the company minimizes the effort to control chemically through biological control, such as planting of beneficial plant such as *Turnera subulata* and *Cassiacobanensis* as an effort to control bagworm and nettle caterpillar populations and using substitute pesticide products which has particularly targeted the same. For example, based on the documents list of pesticide use, pesticide with Bravo 50 EC brands can be substituted with *Cymbush*, which have the same active ingredient of *Sipermethrin* with the main target is nettle caterpillars

The company can show the program and the realization of pesticide application. Monthly pesticide usage records contained in the document of agrochemical consumption data based on the type of work consists of a circle spraying, path spraying, selective / spot spraying, weeds control, strip spraying, bottom weeding, pest and disease control, blanket, sanitation and thinning out. Document ratified by the Document Control, EHS Manager and Estate Manager. Recapitulation of the pesticide usage is contained in the document of Agrochemical Usage Total. This document ratified by Document control and Senior Estate manager.

Based on the visit to chemical warehouse, pesticides contained in the warehouse are in accordance with Table list of pesticide used. Based on the study list of agrochemical / pesticides ingredients used by PT ANIS during 2014 and 2015, no pesticides are included into the category of Class 1A or listed in the Stockholm Convention or Rotterdam and *paraquat*. However, there are pesticides that contain an active ingredient of *Coumatetralyl* with *Tikumin* brands which are included in the pesticide active ingredient with the technical level of danger is high enough (or Class 1B category WHO). The use in 2015 increased by 16 times more from 2014 due to the level of rat pest attack which is high. Related to this, the company has not been able to show the reduction program in the use of *Tikumin* in 2015. This became **Non conformity 2016 No.02 with minor category**.

To maintain and improve the competence of workers in applying the pesticide, the company held training which is conducted regularly of at least once a year. Based on the documents of training program and socialization in 2015, has been implemented spray training and handling of agrochemical on 18 to 20 February 2015 and 14 to 15 August 2016 in Blocks 7A and 7C. The material provided in training, among others, about the dosage and the correct way of spraying, the target being sprayed, the use of PPE and prohibited areas to be sprayed.

The entire hazardous waste including agrochemical packaging generated from estate operational activities and POM is collected and stored in the hazardous waste temporary warehouse which is officially licensed, adapted to the characteristics of the generated hazardous waste, then recorded the amount of waste that enter or exit in the monthly hazardous waste balance logbook. After that, the hazardous waste that stored in the hazardous waste temporary warehouse will be transported by a collector of hazardous waste who has been legally authorized namely PT Mitra Karya Surya Kencana.

Based on visits and interviews with sprayers in Block 105 A / B Division 1 Phase 1 Senabah Division and Block B 060C Phase 5 Kumpai Division, the workers claimed to have received training of spraying technique and the importance of using PPE while working in the field. Workers also stated that the training is conducted every year and the last time was held on 14 to 15 August 2015. Workers can demonstrate their technical job well, can explain where can be mixing the pesticides, a place forbidden to be sprayed, understand the importance of the use of PPE and understand the health and environmental aspects. Supervisors and workers can explain the process of transportation, storage and pesticide expenses, first aid for accidents / spills caused by pesticides, technical of mixing and dilution, maintenance and use of equipment, discarded packaging waste handling and cleanliness.

Based on interviews with management and observation on spraying activities in Kumpai Division and Senabah Division known that the company did not make the application of pesticides from the air.

The results of field observation and interview with sprayers in Kumpai Division and Senabah Division known that workers have been able to demonstrate their technical job well, can explain where can be mixing the pesticides, a place forbidden to be sprayed, understand the importance of PPE use and understand the health and environmental aspects

Former agrochemical waste management activities carried out by established procedures, namely SOP 19 / WIP-KB / (0) / 0610 in 2016 with the title is the management of Hazardous Material and Hazardous Waste. In addition, the company also has a procedure associated with the housing solid waste management with document No. SOP 13 / WIP-KB / (0) / 0610 in 2011. Interviews and field observations for example with chemical spraying team in block 105A / B division 1 phase 1 Senabah known that the employees understand and can explain the procedures of agrochemical former packaging management.

Annual medical supervision specific to pesticide operator has carried out routinely by the company in collaboration with West Kalimantan Hygiene Company and Occupational Health in the form of Cholinesterase examination. The results of medical examinations in March 2015 are documented in the recapitulation and evaluation for treatment if there are health problems in workers and follow up of these evaluation results can be shown by the company. The advice / follow-up which recommended for example, in spraying job do not against the wind, rotation of work into parts that are not exposed to pesticides, workers are using PPE and always washing the hands after the job. The results of interviews with sprayers in Block 060C Phase 5 Kumpai Division submitted that there is no worker who suffered health complaints as a result from the spraying activities.

The company has consistently implemented a ban policy on working for pregnant and nursing women workers on spraying activities. This is evidenced by the results of observations in Block 060C Phase 5 Kumpai Division and interviews with female sprayers known that there are no female workers in the condition of pregnant or nursing and female workers had known about the ban for female workers who are pregnant and nursing on spraying activities.

Minor 4.6.4	Status: Non-conformance NC.2016.2 with minor category	Open
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4.7

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

The Company has consistently documented the OHS policies, OHS procedures and OHS plans covering all operational activities described in the work program of Guiding Committee of Occupational Safety & Health, and based on a review of documents and interviews with management, delivered that until the activities of ASA-3 known that the OHS policies and SOP owned by PT ANI there has been no change.

The Company consistently strives to all operations that could threaten the safety and health has been studied in the document of HIRARC updated every year. Preparation of HIRARC refers to the SOP of Environment and Occupational Health and Safety Aspect (SOP 04/EHS-ANI/(00)/0411) dated April 12, 2011. Based on the observations of operational activities in the POM and estate, the company has implemented the risk controls in accordance with the identification of hazards. For example, the results of field observations in ANI POM on boiler station with noise hazards, exposure to heat and dust, control that has been done is in the form installing a warning and PPE compulsory, *spirometry* medical examination and provision of PPE (helmets, earplugs, masks, gloves and safety shoes).

All workers involved in the operational activities have been given training in safe work practices which is evidenced through training minutes for example Minutes of Training Best Practices Spraying on January 15, 2016 to employees of phase 1, 3B and smallholdings delivered by Field Conductor. Furthermore, based on the observation of spraying activities in Block 060C Phase 5 Kumpai Division known that workers had been able to practice how to work safely. As for the safe spraying practices for example, the spraying activities are not allowed to against the wind and not exceed the height of the waist, and before doing the works, the workers required to use PPE.

The company has been providing PPE that is feasible for all workers at the job site with risk, for example, observations and interviews of workers on the spraying activities in Block 060C Phase 5 Kumpai Division, known that the sprayer has been equipped with PPE in the form of shoes, goggles, masks, helmets, gloves, apron and goggles.

On the activities of ASA-3 there is no change of POM and estate Guiding Committee of Occupational Safety & Health.

Guiding Committee of Occupational Safety & Health Secretary has been certified as OHS Expert with a validity period until September 23, 2017. Interviews with the board of Guiding Committee of Occupational Safety & Health are delivered that Guiding Committee of Occupational Safety & Health has regularly held meetings to discuss the OHS problems, for example a meeting on December 18, 2015 with one discussion agenda about the accident inspection and prevention. In addition, to the regulatory compliance efforts, the company has reported the activity of Guiding Committee of Occupational Safety & Health to Labor and Transmigration Agency of Sambas District routinely per quarter, for example ANI POM Guiding Committee of Occupational Safety & Health reports fourth quarter Letter No. 005 / MCC-ANI / I / 2016 delivered to the Labor and Transmigration Agency of Sambas District on January 18, 2016.

The results of interviews with Spraying supervisor in Block 060C Phase 5 Kumpai Division and manuring supervisor in Block 057 Phase 5 Kumpai Division known that the supervisor has been trained about first aid and understand the aid measures that should be done in case of workplace accidents.

The Company has consistently involved all employees in a workplace accident insurance on Labor Social Insurance Agency. This is evidenced by the company through a document of Social Insurance Agency payment in December 2015 and January 2016 which were paid on January 15 and February 15, 2016. The results of interviews with Indonesia Worker Unions Head of ANI Sambas are delivered that the entire workers have had a workplace accident insurance which are enrolled in the Labor Social Insurance Agency.

The incidence of workplace accidents has been consistently documented by PT ANI in the form of Work Accident Investigation and Corrective Suggestion (FRM01.SOP 06 (1) 0909). Recapitulation of work accidents in PT ANI on January to December 2015 is documented that is for Mill, there were no cases of work accidents while in the Estate there were 39 cases of work accidents with the details of 4 cases with serious injuries (Lost time \geq 3 days), 24 cases with light injuries (Lost time \leq 2 days), 11 cases with First Aid (without lost time), and the total of days lost as many as 16 days were lost. The company also has been able to show the calculation of Lost Time Accident by referring to the Frequency Rate (total accidents x 1,000,000) / working hour total) and Severity Rate (lost time total \geq 3 days x 10,000,000) / working hours total).

The management unit showed the Minutes of MCU Implementation in 2015 with the number of POM workers examined as many as 37 people. Thus not yet enough evidence for periodic medical examinations for all POM workers, especially in high-risk for the period of 2015. **Non conformity No. 2015.4**

Auditor Observation February 16th, 2016

POM management unit showed the evidence of MCU evaluation results in 2015 for 37 workers. However, POM management unit cannot show the evidence of MCU implementation periodically for all high-risk workers.

Non conformity No. 2015.4 with Minor category which appears on ASA-2 have not been fulfilled up to the activities of ASA-3 so that based on the RSPO Certification System annex 4.2.2.4, Non Conformity No. 2015.4 with Minor category turned into Major categories and must be fixed no later than 60 days (April 18, 2016).

Auditor Observation April 05th, 2016

The company showed the minutes of MCU implementation on 15 to 16 March 2016 and the attendance list of 104 POM workers who have followed a general medical examination, audiometric, cholinesterase and or spirometry according to the job risk.

Currently the company is still waiting for the examination results from Sakura Clinical Laboratory. Thus, the company needs to complete the recapitulation document and plans of follow up / evaluation of the MCU results, so non conformity above can be fulfilled.

Auditor Observation April 12th, 2016

The company showed the evidence remediation such as (1) Recapitulation of MCU results of PT Agronusa Investama, dated 15-16 March 2016, (2) List of result identification of ANI POM MCU member year 2016, (3) Schedule on follow up of PT Agronusa Investama MCU result year 2016 and (4) MCU 2016 Evaluation.

Based on the evidence above, non-conformity No. 2015.4 stated fulfilled.

Minor 4.7.2	Status: Non-conformance NC.2015.4with Major category	Closed
4.8		
All staff, workers, smallholders and contractors are appropriately trained.		
<p>The Company has a training program for the staff, employees and workers in accordance with their position competence in the form of training programs in 2015 / 2016 in the Mill and Estate. The training methods include: (1) Training formally made by outsiders and made in the operating unit or employee is sent to the outside, (2) Training made in the training room and made by internal parties, (3) field practice (on the job training), (4) Simulation, (5) Instruction in the field or during the morning briefing.</p> <p>The management unit showed the records of training for each employee that is documented in the Records of Competence and Training Level (FRM 02 / SOP 50 / WIP-KB / (0) / 0810). For example SCCS training with the participants including all POM employees delivered by Mill Manager and Head of Administration.</p>		
	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.		
<p>Until ASA-3 assessment activities take place, there has been no change in the scope of the studies related to the environmental impact of the company operations. PT ANI Sambas has had EIA document in 2000 which was approved by EIA Central Commission Chairman on behalf of Forestry Ministry No. 635 / Menhut-II / 2001 dated May 1, 2001 regarding to the approval of EIA, Environmental Management Plan and Environmental Monitoring Plan of Plantation and Palm Oil Processing Mill PT Agronusa Investama in Sambas District, West Kalimantan Province, covers an area of 15,000 ha of palm oil mill with a capacity of 60 tons / hour.</p> <p>Management and monitoring activities have been reported regularly by the company through Environmental Management Plan / Environmental Monitoring Plan per semester to the relevant agencies, for example, report in first semester of 2015 which has been reported to Local Environmental Agency of West Kalimantan, Plantation Agency of West Kalimantan, Sambas Regent, Local Environmental Agency of Sambas Regency on December 1, 2015.</p> <p>Management review of the management plan and environmental monitoring relevant to the current condition of the plantation has been carried out and the company has shown the evidence of management review of Environmental Management Plan / Environmental Monitoring Plan dated January 12, 2016. Based on a review of management related to the management and monitoring the environment that exists today, the company has added some parameters of environmental observations in the implementation report of Environmental Management Plan / Environmental Monitoring Plan in semester 2016 which are related to the aspects of the decline in air quality, effluent management, and HCV area management.</p>		
	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		
<p>Identification Related to the endangered species and conservation areas in the area of operations carried out in 2009 by independent consultants. The identification results showed the areas with high conservation value in the area of the company amounted to 50.05 hectares consisting of Sentakul riparian, Sentakul River, Anas River, and Senapit River and freshwater swamp forests. In addition, has been identified protected wildlife species under Government Regulation No. 7 in 1999 and CITES Appendix II, which consists of two types of mammals, 2 species of reptiles, 12 species of aves and 5 species of flora.</p>		

Measures to protect HCV are based on the SOP 20 / WIP-KB / (0) / 0610 about the Management of HCV areas. All plans related to the management of conservation areas have been contained in the management plan for HCV area in the period of 2015 to 2020, and the company has implemented related to it, for example, the socialization of protected areas regularly to the public and the employees which were held on January 13, 2016, the installation of sign board for conservation area and wildlife areas, as well as periodic monitoring of the conservation areas and wildlife condition in the company which carried out every month and reported periodically in the report of Environmental Management Plan / Environmental Monitoring Plan every semester.

A field visit in Senabah and Kumpai Estate office poster shows the protection posters of flora and fauna have been available. Interviews with chemical sprayers team in block 105A / B division 1 phase 1 Senabah known that employees can explain the technicalities related to the prohibition of chemical applications on riparian and protected wildlife.

HCV and RTE Value are periodically monitored every month by the management unit. The monitoring results for the period of January 2016 showed in the Senabah and kumpai estate contained several species of fauna found in the plantation areas for example, ground squirrels (tupai tanah), palm squirrels (bajing kelapa), wild boar (babi hutan), White-Breasted Waterhen (kareo padi), small turtledoves (tekukur kecil), water snake, and boa (ular sawah). RTE and HCV species status contained in the plantation area of PT ANI Sambas has been reported regularly to the relevant agencies through implementation report of Environmental Management Plan / Environmental Monitoring Plan in regular semesters

The management unit has a record of flora and fauna monitoring found in the plantation area regularly every month in accordance with the management plan of HCV management in the plantation area of PT ANI Sambas

Based on the field visits in Emak Nyirih riparian in block 32 B Senabah estate and Anas Riparian in Block 47 Phase 5 Kumpai Estate showed that the company is consistently safeguard the water flow through the installation of riparian sign board, Manufacture of riparian boundary: riparian boundary markers in the form of red paint pole.

The management unit has also shown a document of plan and realization in the form of HCV Management Plan Program in 2015 to 2020 and has taken measures to protect HCV areas. Management reviews to the plan and the realization of HCV Management in 2015 to 2020 conducted in 2015 is a follow-up of repair from HCV monitoring which has been carried out so far. For example, related to the management area of high erosion potential (riparian) specifically for sandy area. Managed by the management is doing a bamboo planting in sandy areas as in the Senabah estate.

Bamboo planting is based on the reality in the field that the effectiveness of bamboo is to reduce the rate of erosion better than ever planted crops such as *Angsana*/mahogany.

Status: Comply

5.3

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

The management unit has identified the source of waste for the operational activities of the POM and estate as well as the disposal plan and waste reduction to reduce the pollution resulting for example, related to the management of households domestic waste which are managed by non-burning, effluent management by installing WWTP and management of boiler chimney emissions with the installation of dust collector and routine testing of emission air quality regularly.

Hazardous waste management activities and former agrochemical carried out based on the owned procedures, namely SOP 19 / WIP-KB / (0) / 0610 in 2016 with the title is the management of Hazardous Material and Hazardous Waste. This procedure explains that all of the hazardous waste are stored in hazardous waste temporary warehouse and then transported or managed by other parties who have had official permission. Hazardous waste temporary warehouses that have official permission from Sambas Regent are in the estate of Kumpai Division and ANI Sambas POM. Associated with the storage period of the hazardous waste temporary warehouse, the company showed a letter from Environmental Agency of Sambas Regency No. 660.1 / 153 / BLH-A dated May 25, 2015 which states that the storage period of Hazardous waste in PT ANI Sambas Hazardous Waste Temporary Warehouse is for 365 days (1 year). All hazardous waste collection activities and agrochemical containers are done by collectors who have received official permission that is PT Mitra Karya Surya Kencana.

Field observations in Hazardous Waste Temporary Warehouse of ANI Sambas POM showed the monitoring of

hazardous waste entry and exit are well documented, available hazardous symbol, and there is eye wash for handling the accidents. Transportation of Hazardous Waste last conducted on April 20, 2015 and the company can show a manifest proof of transport by the concerned contractor. Besides, domestic waste management has been made based on the applicable procedures. A field visit in landfills in block 26 A of Senabah Estate obtained information that there is no Hazardous Waste disposed in the Landfill, there are no former of domestic burnt and Landfill location is away from settlements and water resources.

Status: Comply

5.4

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

Implementation conducted by the company to reduce the use of fossil fuels is by using shells and fiber as renewable energy. Analysis and monitoring the use of shells and fiber are recorded in the reports of renewable energy use in 2015. During the period from July to September 2015 for the efficient use of diesel fuel in POM ANI Sambas amounted to 0.85 liters/ton of FFB and the potential savings of diesel fuel by using and fiber and shell amounted to 228,253 liters of diesel fuel.

Status: Comply

5.5

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

Until the ASA-3 assessment activities take place there has been no new land clearing activities or replanting of the company. Company commitments and policies related to the principle of non-burning are contained in the Environmental Management Policy - Wilmar International Group signed by CSR Head and Group Plantation Head updated on September 2010, item 3 - Implement zero-burning in all estate development activities and waste disposal.

Field observations in block C144 Senabah Division for crop planting year 2013 shows that land clearing for planting is done mechanically without burn and the company can show evidence of land clearing without burning records such as through Work Agreement No. 032 / SPK.ANI-SBS / LC / III / 2013 dated March 26, 2013 in the attachment 1 general provisions explained that the contractor must apply the principle of zero burning in land clearing activities.

Status: Comply

5.6

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

The Company has identified the potential sources of pollution and greenhouse gas emission in period of 2015. Implementation activity of emission source management and pollution is based on the inventory procedures and GHG management in 2013. The implementation was done by the company during ASA-3 activity is related with this following aspects:

Effluents:

Field observations in ANI Sambas POM WWTP showed there is no indication of leakage in WWTP and flow meter in the outlet WWTP is functioning properly. Effluent discharged into surface streams based on the license from Sambas Regent No. 183 Year 2011 dated June 6, 2011 which is valid for 5 years. Monitoring of effluent quality is done regularly every month and there are no test parameters that exceed the quality standards such as BOD on December 2015 amounted to 96 mg / L (<standard quality 100 mg / L).

Emission Air Qualities:

Field observations in ANI Sambas POM for example in boiler station showed that the employees have used PPE such as masks, safety glasses, and ear muff. Monitoring related to the emissions and ambient air quality as well as noise and odor conducted every semester and reported regularly through reports of Environmental Management Plan / Environmental Monitoring Plan implementation to the relevant agencies. The results of periodic examinations showed during semester 2 in 2015 all the parameters related to the emission and ambient air is still below the quality standard for example, the opacity for the boiler 1 amounted to 19% (<standard quality 30%), the noise at the loading ramp amounted to 67.3 dBA (<standard quality 70 dBA) and the company requires all employees to use appropriate PPE such as ear plugs and ear muff.

GHG Emissions

GHG inventory conducted by the company based on the Greenhouse Gas Inventory SOP in 2013. ANI Sambas POM and its estate suppliers have reported GHG emission calculation in the period of 2015 through email to the RSPO secretariat (melissa.chin@rspo.org) dated February 15, 2016. Total emissions generated by ANI Sambas POM and its estate suppliers during the period of 2015 were 0.20 tCO ₂ e / ton of FFB.		
	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.		
<p>Available Document of Social Impact Assessment PT Agronusa Investama, Plantations & Palm Oil Mills Sambas Regency, West Kalimantan. The assessment process conducted in 2011 by the Indonesian Resource Institute. The document describes the social impact management of estates and mills, among others: employment opportunity, health and safety, facilities and benefits of workers, consultancy and communication, stability of employment, business opportunities, revenues, household income, institutional, perception at the company, socio-cultural changes, i.e. workers and community health, and tenure. The process of data collection is done through discussions with the parties, the employee and the communities. The results of the discussions are described in the form of minutes of the discussion results. The record evidences are in the form of Discussion Participants List at the time of information collections. The parties that are involved, among others, employees and surrounding village communities (Semanga Village, Beringin Village and Sepantai Village), attached to the report.</p> <p>To avoid or reduce negative impacts and enhance positive impacts, PT Agronusa Investama has developed several plans that have been consulted with the stakeholders. Has been shown some evidence of records, among others:</p> <ul style="list-style-type: none"> • Documents of Environmental Management Plan / Environmental Monitoring Plan Implementation Report in Semester 1 of 2015. In the document has been explained about the social impacts which are monitored and managed, among others: Public Unrest and job opportunities. • Implementation summary of information collection for the preparation of plans in monitoring and managing social impact. <p>PT Agronusa Investama already have documents of Environmental Management Plan/Environmental Monitoring Plan Implementation Report and have been shown the report for the first semester of 2015 and the Social Impact Study Report containing draft of Management Plan and Monitoring in 2011 to 2015. But not enough evidence that it has been carried out a review of at least 2 years of those plans and the review process involves the participation from affected parties. Under these conditions then contained non conformity No. 2016.03 with minor category.</p> <p>PT Agronusa Investama has established cooperation partnership for smallholders program with 2 KUD that is KUD of Sentama Lestari and Cempaka Biru.</p>		
Minor 6.1.4	Status: Non-conformance NC.2016.3 with minor category	Open
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 Agronusa Investama has owned SOP of Providing Information to Outside Parties (Transparency), Document No: SOP 52 / WIP-KB / (1) / 0911. The procedures governing the procedures for communication with the parties (stakeholders). The officers who are responsible for consulting and communicating with the public are a Staff of Bina Mitra in accordance to the Responses Flow on the Information Requests. In addition, there are also procedures of Communication Implementation Mechanism and Public Consultation and the Appointment of Consulting And Communication Officers With the Community (SOP 03 / WIP-KB / (1) / 0911).

The company has set the PIC for consulting and communicating with the public that is Staff of Bina Mitra. This is consistent with the Responses Flow to Requests for Information in SOP 52 / WIP-KB / (1) 0911. Based on the organization structure that exists today, the officer of Bina Mitra in the estate was Mr. Gerson Boy (Department of Bina Mitra), while for the officer of Bina Mitra in the mill was Mr. Surya Supriadi (EHS Mill). Based on the job description that applies, the officers who are responsible for communicating and consulting with the community after coordinating with the manager and company leader.

PT Agronusa Investama owned the list of Stakeholder, in the Period of January 2016. The stakeholder has been classified, among others; Government Agency, Contractor, Shops / Primary goods supplier and NGO.

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 Agronusa Investama already have a mechanism to receive complaints and to resolve a dispute effectively as seen in the SOP of Complaints Acceptance and Settlement of Disputes especially outside the Court (Document No: SOP 04 / WIP-KB / (0) / 0610). The procedure comes with Annex in the form of Complaints Acceptance and Complaints Acceptance Records from the communities and employees.

Based on the verification of documents and interviews with management representatives (Officers of Bina Mitra and Mill Staff), obtained the information that there are no cases of the ongoing dispute with the communities or other parties. From the results of public consultation in Sepantai Village and Cooperative Management of Sentama Lestari, Beringin Village and Cempaka Biru, Semanga Village also note that at this time there are no issues related to land ownership disputes between PT Agronusa Investama with the parties.

The company is kept all evidence of land issues completion records in the past. Against the land dispute cases that have occurred, provided evidence of the dispute settlement acceptable to all parties, for example:

- Settlement of land disputes with the communities of Sajingan Kecil Hutment, Semanga Village, Kumpai Division in 2008 through consultation and compensation.
- Settlement of disputes with Beringin Village Community, Sajad District of Sambas Regency, on September 22, 2008.
- Records of dispute resolution with the communities of Senabah Hutment, Semanga Village, Sejangkung District of Sambas Regency in 2008 has been resolved through negotiations and the payment of compensation.

Based on interviews with employee representatives (Board of Worker Unions) and also the results of public consultation with Sepantai Village and discussion with the Cooperative Management of Sentama Lestari and Cempaka Biru, it is known that there are no complaints from the parties. Based on the procedures above, the PIC for receiving complaints is the Public Relations Staff then forwarded to Estate manager, based on the available record evidences, the system has been communicated to the parties (on January 28, 2015, attached photos and Attendance List of Participants and on February 4, 2015 (Attached pictures and attendance list of participants). The results of interviews with employee representatives (Board of Worker Unions) and also the results of public consultation in the village Sepantai and discussion with the Cooperative Management of Sentama Lestari and Cempaka Biru, it is known that the system has been understood by the parties. Based on the checking of incoming and outgoing mails and information from the public relations staff, it is known that there are no complaints from the parties during the period of one year, there are only a few requests from the public related to the assistances.

Procedures related to the employee complaints are included in the SOP of Complaints Acceptance and Settlement of Disputes especially Outside the Court (Document No: SOP 04 / WIP-KB / (0) / 0610). The procedure has been added by clauses on the protection of the reporting and follow-up process if the complaints cannot be resolved by consultations.

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 Agronusa Investama already has the procedures of identification, calculations and Compensation in the form of SOP of Soil / Land Acquisition Technical Guide (SOP 01 / WIP-KB / (0) 0610). Has been shown the examples of record evidence in the process of land acquisition in the form of Agreement Minutes between PT Agronusa Investama with landowners witnessed by the parties, among others: Sub District Head and Village Chief). Also available evidences of Land Submission Letter from each owner / land tenants to PT Agronusa Investama.

Based on the procedures of identification, calculations and Compensation in the form of SOP of Soil / Land Acquisition Technical guidelines (SOP 01 / WIP-KB / (0) 0610) which has been owned by the company, in the past has been made the granting of compensation process for land compensation. It has been shown the evidence of implementation of the existing procedures, namely through the granting of compensation records (land compensation), for example:

- Settlement of land disputes with the communities of Sajingan Village, Semanga Village, Kumpai Division in 2008 through consultation and compensation.
- Records of dispute resolution with the communities of Senabah Hutment, Semanga Village, Sejangkung District of Sambas Regency in 2008 has been resolved through negotiations and the payment of compensation.

Resolution processes of land compensation in the past, has been filed by the company. There are examples of Statement letter of Land Release Agreement which entered the Administration area of Satai Hutment, Sepantai Village of Sejangkung District on September 22, 2008. The land area of \pm 170 hectares in the measuring image of Land Use Title Plans in PT Agronusa Investama are administratively in the region of Satai Hutment, Sepantai Village with the limits: North (Measuring image of Land Use Title Plans); Western (State Land of Satai Hutment Region); East (State Land of Satai Hutment Region); South (Measuring image of Land Use Title plan). The statement letter known and signed by the parties, among others: Village Chief of Sepantai, Member of Sepantai Village Representatives, Satai Hutment Representatives, Sejangkung Sub District Head and Manager of PT Agronusa Investama. The statement letter has been recorded and registered on May 1, 2009 by the Notary on behalf of HARDIANSYAH, SH No. 35 / LIST / V / 2009.

Based on the results of the consultation in Sepantai Village and discussions with the Cooperative Management of Sentama Lestari and Cempaka Biru, it is known that some time ago, there are no longer processes of land compensation taken by the company. It has been done in the early days.

Status: Comply

6.5

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

The wage system which is consistently applied by PT Agronusa Investama refers to the minimum wage provisions set in West Kalimantan Governor Decree No. 857 / Nakertrans / 2015 on November 11, 2015. In the decree set about Sectoral Minimum Wage of Sambas Regency for oil palm plantations including palm oil industry of CPO amounted to IDR 1,934,525. The company issued Internal Memorandum No. 005 / HRGA-IM / I / 2016 dated January 18, 2016 regarding to the District and Sectoral Minimum Wage of Sambas Regency in 2016 which refers to the decree above. Based on the observations of wage records and interviews with Mill and Estate employees, it is known that the wages are received by workers in accordance with the rules and meet the wage system and applicable minimum wage regulations.

PT Agronusa Investama has two documents which govern about the rights and obligations of employees, that is Company Regulations which are applicable in the POM and Collective Labor Agreement between the company and Unit Leader of Indonesian Workers Union for Estate unit. On the activities of ASA-3, Company Regulations and Collective Labor Agreement are still valid for the period of 2015 to 2017, and in accordance with labor legislation and ratified by the Labor and Transmigration Agency of Sambas Regency No. KEP.73 / STKT-C / 2015 dated March 3, 2015 and No. KEP.560 / 35 / STKT / 2015 dated February 13, 2015 with a validity period for 2 years.

Based on the observations during the field visit on the Mill Employees Housing, there are some houses that are already

in poor condition (for example, the walls are cracked / broken) and sanitary conditions around the housing area are inadequate. **Non conformity No. 2016.04 with Minor category 6.5.3**

The management unit has been able to demonstrate an effort to improve workers' access for decent food, fairly and at affordable prices through the provision of cooperative with the supply of basic needs for employees.

Minor 6.5.3	Status: Non-conformance NC.2016.4 with minor category	Open
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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.

In interviews with the head of the Unit Leader of Indonesian Workers Union in Senabah Unit known that the company has consistently given the freedom of association for all employees in accordance with the applicable regulations. Unit Leader of Indonesian Workers Union has served as a forum for the aspirations and complaints from the members related to the activities of industrial relations between employees and management. Communication between Unit Leader of Indonesian Workers Union with management unit has gone well. Internal meeting of Unit Leader of Indonesian Workers Union conducted regularly and meetings with management (Bipartite Cooperation Institution) is done for example Minutes of Indonesian Workers Union meetings and the management on December 15, 2015 with the discussion agenda about the District Minimum Wages and Harvest wages in 2016, which was attended by the board of workers union and the management of PT ANI.

	Status: Comply	
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6.7
Children are not employed or exploited.

The management unit consistently apply the conditions of employment according to law for not to employ children under 18 years old. The results of the employee data observations in January 2016 and a field visits to the Senabah and Kumpai Division and ANIS POM known that there are no workers under 18 years old. Provided bulletin board in the POM office, Senabah and Kumpai Division Office, employee housing about the minimum age limit information that is allowed to work in the company. In general, workers had found out about the minimum age limit.

	Status: Comply	
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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.

The management unit showed employee data records in January 2016, known that the workers are coming from various ethnic, religious, gender, local workers from the villages around the company and non-local workers / immigrants from various regions. Interviews with the head of the Unit Leader of Indonesian Workers Union in Senabah Unit known that the company has provided opportunities and equal handling to all employees, there is no discrimination by discriminating based on the race, caste, religion, gender, and age.

Inside the Collective Labor Agreement of PT ANI in the period of 2015 to 2017 Chapter II Article 10 described about the conditions of admission based on the qualifications, experiences and skills necessary to carry out the work regardless of religion, race, gender, and age is not less than 18 years old.

Selection that made including administration (cover letter, photographs, copies of diplomas, Police certificate, health certificate, copy of ID card and birth certificate), interview, written test, and skill test, psychological and medical tests.

The Company has documented records of recruitment in the form of employee proposal form that contains biographical data of workers, an application letter equipped with a copy of ID card, diploma, Family Card, Police Certificate, health certificate and a photograph, as well as a Statement about the rights and obligations of workers signed by the workers.

	Status: Comply	
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6.9
There is no harassment or abuse in the work place, and reproductive rights are protected.

The Company consistently implements a sexual harassment policy and protection of reproductive rights, proven with the results of interviews with the Female Committee of PT ANI known there are no reported cases of sexual harassment

that occurs on workers and the implementation of menstruation leave and maternity leave for female workers in accordance with the provisions of applicable laws.

Inside the SOP of Handling on Sexual Harassment Complaint, Document No: SOP 46 / WIP-KB (HRD) (0) / 2011, the effective date on January 2011 Point 5.3.2 stated that all complaints should be handled confidentially, recorded and archived properly. During the investigation, the complainant and the suspect must do an investigation separately.

Status: Comply

6.10

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

The price of FFB is determined by Plantation Agency of West Kalimantan based on the meeting with the parties consisting of; Oil palm plantation Company management, representatives from Smallholders Cooperative and the Farmer Representatives. Mill Management of PT Agronusa Investama has shown the Meeting Minutes of "K" Index Determination and the Price of Oil Palm Plantation Production in West Kalimantan, on February 2016. Based on the explanations from Palm Oil Mill Manager of PT Agronusa Investama that the price has already known by the parties (farmers and other suppliers), because at the time of FFB pricing, the representatives from each party has participated in the determination of the price and the agreement will be sent by Plantation Agency to each party among others, the Company manager of oil palm plantations, cooperatives and representatives of Farmers and others. If there are those who ask or wanted to know the price, the mill manager would show the document and has also been posted on the mill bulletin board.

The company also has been cooperating with local contractors. It has been shown the examples of Collective Labor Agreement No: 334 / PT.ANI-SMBs / SNBH / G.10-SERIMARAM / IX / 2015, on September 30, 2015. The Collective Labor Agreement is the basis for cooperation between PT Agronusa Investama which provides the opportunity for the contractors (CV Pulau Indah) for Constructing Employee Housing type G. 10 in Division 1 of Serimaram Block 144C. In the document of collective labor agreement has been elaborated about several things, among others: the scope of work, rights and obligations of each party, payment mechanisms, aspects of Health and Safety and Insurance from workers / contractor personnel. The document was signed by the company representatives, the Contractor and the Witness and be given the stamp duty Rp 6000. There are examples of PT Agronusa Investama payment to the Contractors of CV Pulau Indah for employee housing construction. Payments are made through Bank BCA, on February 3, 2016. The payment was made in accordance with the agreement that will be made after the entire job otherwise been completed by the contractors and have been examined by the employer, namely PT Agronusa Investama.

Status: Comply

6.11

Growers and millers contribute to local sustainable development wherever appropriate.

The Company's contribution to local development is shown through a few things, among others:

- Corporate Social Responsibility Program (CSR), has been shown the document of Implementation Summary in 2015, among others:
 - Construction of the connecting road between Senabah and Sembako'an Hutment (News Events & Photos attached)
 - Assistance for renovation the places of worship in Senabah Hutment, Semako'an Hutment (News Events & Photos attached)
 - Assistance of food materials for flood victims in the Senabah Hutment, Semanga Village (News Events & Photos attached)
- Payment of Land and Building Tax in 2015
- The use of local contractors service for the construction of employee housing
- Smallholders program that has been ongoing for the farmers who are members of the Smallholders Cooperative (for example, Sementama Lestari and Cempaka Biru)

PT Agronusa Investama also has a Work Plan (Program) CSR for the period of 2016. Some of the programs that will be implemented is in the field of:

- Infrastructure that is road maintenance in the village of Sepantai, Sejangkung District.
- Economic, including; Communities economic empowerment and opening the field of business / job
- Health, including; construction of water reservoirs in Beringin Village and will be adjusted based on the proposals

from the nearby village community

- Education, including; one unit computer for Satai Elementary school in Sepantai Village and Early Childhood Education (ECD) in Senabah Hutment, Semanga Village.
- Preservation of Cultural Values, which is based on the proposal from the Government of Sabung Village and Village Allocation Fund of Sambas district for development assistance of custom meeting place for Dayak Bekatik Ethnic in Subah District.

Based on the results of consultation in Sepantai Village known that the company never / has provided some assistances to the local village, among others, development assistance of Elementary schools and heavy machinery to repair roads. From interviews with the cooperative management of Sentama Lestari in Beringin village and Cempaka Biru Cooperative in Sajingan Village known that smallholdings program has been running since 2010.

Status: Comply

6.12

No forms of forced or trafficked labour a reused.

The company showed the related documents with proof that the company is not using trafficked labor illegally or forced in any forms.

- Letter No. 004/ANI-SMBS/II/2015 Dated February 16, 2015 regarding to the Application of Plans on the needs of Labor between regions (RKTAD) recommendation
- Letter No. 562.2/215.C/STKT/2015 Dated March 4, 2015 from Labor and Transmigration Agency of Sambas Regency which described that the application of PT ANI approved with the provisions as follows:
 - Deployment of the prospective workers in the province of D.I Yogyakarta, East Java, West Java, Lampung and West Nusa Tenggara
 - Inter-city inter-regional prospective workers employed at PT ANI as a harvester.
 - Deployment of inter-city inter-regional prospective workers are implemented by knowing and carried out together with Labor and Transmigration Agency of Sambas Regency
 - In the implementation of inter-city inter-regional prospective workers, guided by Regulation of Labor and Transmigration Ministry No. PER.07 / MEN / IV / 2008 dated April 21, 2008 and Decree of Binapenta General Director No. Kep180 / BP / 2000 dated December 21, 2010.
 - Qualifications of inter-city inter-regional workers among others, the work types of harvesters, male, amounted to 130 people, 19 until 45 years old, salaries in accordance with the provisions of Sambas Regency minimum wage, the wage system and work system by wholesale, the contract for 2 years, departure city from Yogyakarta, Lampung, East Java, West Java and NTB, destination city is Sambas, type of transportation through land, sea and air.
 - The activity checklist of Plan on the needs of Labor between regions (DI-RKTAD), which informed about the identity of the company, responsible for the deployment of inter-city inter-regional workers, type of business sector, products, the number of workers at this time, total area, the number of labor area requested, the time required and the duration of the works.

The management unit showed evidence that there is no labor trafficking, and forced in any forms and there is no substitution of the contract. From the results of interviews with several employees in the operational activities of estate and mill, it is also known that the employees have known about their rights and obligations based on the work agreements that they had signed during the process of recruitment.

Status: Comply

6.13

Growers and millers respect human rights

Human Rights Policy of Wilmar International Ltd which was published on June 2014 and ratified by the Group of Plantation Head and the Group of CSR Head. In the policy stated that the commitment of Wilmar is supporting the respect and protection of human rights as a policy of anti-child labor, OHS, providing equal opportunity for everyone, reports and complaints, anti-sexual harassment, anti-violence and torture, respect for reproductive rights, and social responsibility of the company. This policy applies to all companies under the auspices of Wilmar group and business unit which has relationships including suppliers and contractors.

The policy has been communicated to workers, for example on August 19, 2015 for the Supervisor and maintenance

employees in Phase 5 of Kumpai Division delivered by General Affairs Personal. Besides, the interview with the Head of Unit Leader of Indonesian Workers Union of PT ANI delivered that unprecedented case of violation on human rights in PT ANI.

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.

Until now there has been no new land clearing and replanting carried out by PT Agronusa Investama. Until the ASA-3 assessment activities take place, there has been no change in the scope of studies related to the environmental impact caused by the company's operations. Environmental impact assessments for Sentama Lestari and Cempaka Biru smallholdings included in the EIA of PT ANI Sambas nucleus estate.

PT ANI Sambas owned an EIA document in 2000 which was approved by Central EIA Commission Chairman on behalf of Forestry Minister No. 635 / Menhut-II / 2001 dated May 1, 2001 regarding to the approval of EIA, Environmental Management Plan and Environmental Monitoring Plan of Plantation and Palm Oil Processing Mill of PT Agronusa Investama in Sambas District, West Kalimantan Province, covering an area of 15,000 hectares with a POM capacity is 60 tons / hour.

The activities of management and monitoring have been reported regularly by the company through Environmental Management Plan / Environmental Monitoring Plan report per semester to the relevant agencies, for example, semester 1 report in 2015 which has been reported to Local Environmental Body of West Kalimantan Province, Plantation Agency of West Kalimantan province, Sambas Regent, Local Environmental Agency of Sambas Regency on December 1st, 2015.

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.

The Company has a land survey maps derived from the soil survey report on May in 2008 by Param Agricultural Soil Survey Sdn. Bhd. With a scale of 1: 50,000 and 1: 25,000. The survey results showed that PT ANIS consists of 12 types of land consisting from developed over sedimentary rocks, sub-recent, and organic deposit. Against to the 12 types of the soil are outlined its properties and assessed the level of soil suitability, drain ability assessment and strategies needed for oil palm cultivation. Detailed explanation about the types of soil in the area of company's operations are described in Appendix 1 about the soil profile description and analytical data which includes a description of physical properties and soil chemistry, among others, for example the color, texture, drainage, rooting, topography, parent material, fertility rate and sectional view of the soil profile. Soil survey of nucleus is made simultaneously with smallholdings, so that by using the same input management strategy. The identified twelve types of soil are classified into four groups of land which each of them are described about its characteristics, the percentage of its range and its management strategy. For example, land in group B has the following characteristics: shallow (0-50 cm) to deep (> 100 cm) sandy soils with cemented layer, flooding / moisture stress, poor anchorage, poor rooting, wind damage, very low moisture and nutrient holding capacity and very low fertility status. Recommended input management strategies includes: minimized land clearing, to break-up cemented pan, mulching with EFB, POME application, good fertilizer program and trace elements. Based on the field visits, it can be concluded that the company has conducted a recommendation on soil survey analysis results among others, water management for peat lands and soil and water conservation in sandy areas.

Based on topographic maps with a scale of 1: 80,000 dated October 30, 2012 and soil maps from soil survey study results showed that the conditions of slope varies from flat, undulating and rolling with a sandy texture. The company has no land with a slope more than 40% (steep). In general the topography condition is dominated by flat to undulating slope grade (0 to 6%). However, the area with slope of 25 to 40% carried out soil and water conservation efforts that consist of making terrace, monitoring the erosion through the installation of erosion pole, planting vertiver grass in the slope area, planting LCC (*Mucuna* sp.). The boards ban to not spraying the LCC and vertiver grass, technique and the selection of fertilizer types and midrib arrangement in the same direction with the contour. Erosion and run-off becomes

a limitation factor.

Topographic maps and soil survey used as a reference in the planning of water management in the area of peat and sand. Based on the field visits, it can be concluded that the drainage system was made in the area of peat and soil and water conservation activities in sandy areas such as EFB applications, are in accordance with the rules of best management practices.

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.

Identification of HCV carried out in 2009 and there is evidence that the identification is done by involving the affected parties (in the form of a public consultation on April 30, 2009). The management plan and implementation measure related to the identification of HCV has been set forth in the management of plan of HCV in the period of 2015 to 2020 (see indicator 5.2).

The document study of planting year, planting year map, environmental document, as well as Interviews with the management obtained information that the plantation area of PT ANI Sambas now is a logged area of forest concession with the activities of land clearing was first done gradually starting in 1997 by the former company, PT Bantan Eka Jaya before taken over by PT ANI Sambas. The study documents of statement acreage in 2016 showed that the oldest planting year located in Senabah Division with the planting year of 1998 and the youngest planting is on 2013 in Senabah estate.

During the period of 2005 to 2009 the company has made new planting of oil palm. Based on the report of land use cover changes analysis in 2015 obtained information that during the period of 2005 to 2009 the total of opened area and planted with palm oil is 2,468.01 hectares. Related to this, the company has sent a report of disclosure and compensation liability and land use change analysis related to the opened area after the period of November 2005 without preceded by the identification of HCV to Dillon Samrin through email on April 8, 2015 (rspo.compensation@rspo.org). Until the ASA-3 assessment activities take place, the RSPO Secretariat still verifying the reports related to the disclosure and compensation liability, and land use change analysis that submitted by the company and it is becoming observation on ASA-3 assessment at this time.

Status: Comply

7.4

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

The company can show the vulnerable and marginal map with sufficient scale (1:25,000), among others semi-detailed soil map from the soil survey results on May 2008, peat zoning map in Senabah and Kumpai Division on November 10, 2012 and topographic maps on October 30, 2012.

Based on the soil analysis by the Param Agricultural Survey, the land in PT ANI Sambas divided into four categories: Group A, B, C, D. The whole group showed a tendency infertile soil, especially in Group B which showed marginal soils such as sandy soil (soil type Saratok, Kambisol Hapic / Sandy loam), Tika (Regosol Kwasik / Sand), Silantek / Sil (Podzol Humic / Loose sand), Sibuga (Podsol Humic / Loose sand). The results of the soil survey study showed that the condition of slope is varied from flat, undulating and rolling with a sandy texture. In addition to peat, the erosion and run-off in the areas with sandy texture become a limiting factor in the activities of oil palm cultivation.

On sandy soils with low fertility levels applied strategy of conservation of soil and water, for example, improving the condition of soil nutrient status through increased organic matter soil through recycling methods of biomass consisting of EFB application with a dose of 40 tons / ha, planting LCC (*Mucuna*) and its treatment through selective weeding and frond stacking. In the area with slope of 12 to 25% is applied cropping pattern with terrace system, monitoring soil erosion, planting vetiver grass and *Mucuna* and frond stacking in the same direction with the contour lines. For peat area, the management unit is implementing water management in peat land by way of installation of drainage system to keep the water level in the range of 50 to 60 cm, with the installation and monitoring the peat subsidence and manufacture of fertilizer recommendations based on the results of analysis of leaves and soil.

Based on field visits, it was found that the company has implemented vulnerable land management strategies as mentioned in the points above.

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.

It has been shown an example of settlement process of land compensation, for example, Land Release Agreement which entered the Land Administration of Satai Hutment, Sepantai village, Sejangkung District, dated September 22, 2008. Covering an area of ± 170 hectares in the measuring image of Land Use Title Plan of PT Agronusa Investama which is an administrative areas of Satai hutment, Sepantai Village with boundaries: North (Measuring image of Land Use Title plan); Western (State Land of Satai Hutment Region); East (State Land of Satai Hutment Region); South (Measuring image of Land Use Title plan). Known that the statement is made and signed by the parties, among others: Village Chief of Sepantai, Member of the Representative Board of Sepantai village, Village Chief of Satai, Sub District Head of Sejangkung and Manager of PT Agronusa Investama. The statement letter has been recorded and registered on May 1, 2009 by Notary on behalf of HARDIANSYAH, SH No. 35 / DAFTAR / V / 2009.

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.

PT Agronusa Investama has shown several evidences of compensation records (granting compensation) land, among others:

- Payment Receipt of land Compensation covering an area of 1,577 hectares in the administrative area of Senabah Hutment, Semanga Village on September 19, 2008 through the transfer of Bank Mandiri on behalf of Mr. Ahmadi accounts amounted to Rp 448,100,000.
- Payment Receipt of land Compensation covering an area of 816 hectares in the administrative area of Setambah – Semakuan Hutment, Semanga Village on September 19, 2008 through the transfer of Bank Mandiri on behalf of Mr. Ismail Syafe'i accounts amounted to IDR 219,800,000.
- Payment Receipt of land Compensation covering an area of 236 hectares in the administrative area of Satai Hutment, Sepantai Village on September 19, 2008 through the transfer of Bank Mandiri on behalf of Mr. Herlin accounts amounted to IDR 15,800,000.
- Payment Receipt of land Compensation covering an area of 200 hectares in the administrative area of Beringin Village on September 19, 2008 through the transfer of Bank Mandiri on behalf of Mr. Asnadi Asmo'ie accounts amounted to IDR 35,000,000.
- Payment receipt of land and Crops compensation in Sabung Village, Subah District on June 28, 2006 amounted to IDR 185,000,000 for an area of 462.5 hectares.

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

Based on interviews with relevant staff (Staff of Legal Document) at the time of ASA 03 activity, obtained information that there were no cases of land disputes is happening with the communities or other parties. From the results of public consultation in Sepantai Village and Cooperative Management of Sentama Lestari in Beringin Village and Cempaka Biru in Semanga Village also note that at this time there were no issues related to land ownership disputes between PT Agronusa Investama with the parties.

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.

Until the ASA-3 assessment activities take place there has been no new land clearing activities or replanting of the company. Commitment and company policies related to the principle of non-burning contained in the Environmental Management Policy - Wilmar International Group signed by the Group and CSR Head and Group Plantation Head updated on September 2010, item 3 - Implement *zero-burning* in all estate development activities and waste disposal.

Field observations in block C144 of Senabah Division for crops with planting year of 2013 showed that land clearing for planting is done mechanically without fuel and the company can also show the evidence of land clearing without burning records such as through collective labor agreement No. 032 / SPK.ANI-SBS / LC / III / 2013 dated March 26, 2013 in which the attachment 1 about general provisions explained that the contractor must apply the principle of zero burning in land clearing activities.

Status: Comply

7.8

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

Not applicable. There are no land clearing activities after January 1, 2015 for the nucleus estate and smallholders in the operational areas of PT ANI Sambas.

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.

Internal Audit

The Company has conducted RSPO internal audit as a form of monitoring activity of POM and estate to obtain a definite improvement. Available RSPO Internal Audit Reports of PT ANI Sambas which were performed on 25 to 28 November, 2014.

Agronomy Aspects and Palm Oil Processing

Related to the technical of cultivation and processing of palm oil, the company has a mechanism to monitor and evaluate every activity that is made through the study between the daily reports of quantitative agro management system (QAMS) census, the audit reports of system development control (SDC) every three months and reports of RSPO and ISPO internal audit which are scheduled twice a year. Information dissemination and evaluation of those reports to the employees are implemented through the master ground in early morning and special training for management team and workers.

Environmental Aspects

The company has been managing the environment recorded in the report of Environmental Management Plan / Environmental Monitoring Plan in first semester of 2014, among others, Mill Effluent Quality Testing, Air Emissions Testing (Boiler), Air Emissions Testing (Generator), Ambient Air Quality Testing, Noise Testing. The company has reported Environmental Management Plan / Environmental Monitoring Plan in first semester of 2014 to Environmental Bodies of Sambas Regency on December 8, 2014.

Social Impact (Criteria 6.1)

Social Impact Assessment has been carried out from the management of estates and mills. Inside the document has been described about the monitoring and management plan that will be carried out. The preparation of monitoring and management plan is done through the involvement of affected parties (communities).

Status: Comply

3.2. Summary of Assessment Report of Supply Chain Requirement

Clause	(Module E) CPO Mills - Mass Balance Requirements
E.1	Definition
E.1.1	<p>Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and volume sales of RSPO certified producers. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p> <p>PT Agronusa Investama POM has owned procedures documented for accepting and Processing certified and non-certified FFB. Mechanism for verifying the incoming FFB, described in several procedures, among others:</p> <ol style="list-style-type: none"> SOP of FFB Admissions (SOP 02/SRT-ANI/ (01)/0113 and SOP of FFB reception from outside (SOP 03/SRT-ANI/ (00)/0211. SOP of Mass Balance No. SOP 12/ADM-ANI/(00)0112 effective on January 1, 2012 which contains explanations: <ul style="list-style-type: none"> Incoming FFB process, including through the data input of nucleus and outer FFB acceptance (outsider) with Sustainable FFB status (certified) and Non Sustainable FFB (non-certified) in the appropriate columns. FFB data input process to be a Production Supervisor reports and reports of CPO / PK generated from sounding reports to determine the OER / KER and physical stock of CPO / PK in the appropriate columns. Data input for shipments of CPO / PK from the mill process according to its status (Sustainable or Non-Sustainable Sustainable CPO / PK) in the appropriate columns. <ul style="list-style-type: none"> Receiving and checking the DO status from Trading Head Office (Request of CSPO or non CSPO). Based on the status of DO Request and the conditions of stock balance, determine the delivery types of CPO / PPK to be performed. Fill the number for CPO / PK shipments according to the number and its status within the dispatch table and update the stock balance conditions based on the comparison of incoming and dispatch. SOP of CPO and PK products traceability (SOP 11 / ADM-ANI / (01) / 0314), the effective date on March 1, 2014 explaining that the facility to process the FFB into CPO and PK from certified and non-certified sources simultaneously (mixed), but in the administration / reporting stock by using separation between Mass Balance or separated between the stock of certified and non-certified CPO / PK. <p>Has been shown examples of FFB acceptance from certified sources (RSPO Certified) and non-certified. Sample of Delivery Order Letter (SPB) and Fruit Weigh Tickets (Weighbridge Ticket), dated February 16, 2016:</p> <p><u>RSPO Certified Product</u></p> <ul style="list-style-type: none"> Delivery Order Letter from Senabah Division, (Phase 3B), Vehicle No. KB 9915 WC, driver name Riyan with the number of bunches is 196 with an estimated weight of 3,291 kg (estate weight). Fruit Weigh Tickets from Senabah Division, (Phase 3B), Vehicle No. KB 9915 WC, driver name Riyan, Weight 3,291 Kg <p><u>Non Certified Product</u></p> <ul style="list-style-type: none"> Delivery Order Letter from Multidaya Fortuna: No: 001-0023, Vehicle No. KB 606 XX, Driver name Seto Wiryanto with the number of bunches is 400 with an estimated weight of 5,780 Kg (estate weight) and Mill Weight is 5,358 Kg. Fruit Weigh Tickets from Multidaya Fortuna, Vehicle No. KB 606 XX, Driver name Seto Wiryanto, Weight 5,358 Kg.
	Status: Comply
E.2	Explanation
E.2.1	<p>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</p>

produced should then be recorded in each subsequent annual surveillance report.	
CPO and PK data produced by Agronusa Investama POM in the period of April 22, 2015 until the implementation of ASA 03 (February 15, 2016) and estimated claims of Palm Products to be certified described in the table below, as also described in the basic information.	
	Status: Comply
E.2.2	
The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).	
Agronusa Investama POM - PT Agronusa Investama (Wilmar International Limited) has registered for RSPO-certified products which are CSPO and CSPK through RSPO IT Platform, member registration number: RSPO_PO10000002130 .	
From the results of document verification and explanations from Mill Manager of Agronusa Investama POM and Mill Supervisor from the Regional Office of Pontianak, obtained information that during the period of April 22, 2015 until the implementation of ASA 03 (February 2016) there is no demand and sales of RSPO Certified products (CPO and PK). Based on the checking of Product Details in the program E-trace for PT Agronusa Investama, it is known that the Certified volume of CPO and PK that can be claimed for the period from April 22, 2015 till April 21, 2016, namely CPO: 24,422 MT and PK: 5,963 MT is still equal in the number until the implementation of ASA 03. Attached documentation from e-trace system.	
	Status: Comply
E.3	Documented procedures
E.3.1	
The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:	
a. Complete and up to date procedures covering the implementation of all the elements in these requirements; b. The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site procedures for the implementation of this standard.	
Agronusa Investama POM has owned procedures and / or written work instructions to ensure the implementation of all elements in terms of supply chain. The procedures are consists of:	
<ol style="list-style-type: none"> SOP of CPO and PK product traceability with the document No.SOP11/ADM-ANI/ (01)/0314. The procedures are described about the requirements of SCCS Module E Mass Balance to complete the SOP document of Mass Balance including simulation and calculation documents if there is demand for certified products (CSPO). SOP of FFB acceptance (SOP 02/SRT-ANI/ (01)/0113 and SOP of FFB acceptance from outside (SOP 03/SRT-ANI/ (00)/0211. SOP of Mass Balance No. SOP 12/ADM-ANI/(00)0112,describes the recording stages in the procedure of Mass Balance. 	
These procedures include:	
<ul style="list-style-type: none"> Aim: To ensure that the acceptance of FFB until the dispatch of CSPO / CPO is done with the right workflow, from FFB acceptance, FFB processing into CSPO / CPO, shipment of CSPO / CPO up to the reporting so that the FFB and product traceability can be easily and consistently. Scope: This procedure applies to any part that is responsible for providing the data of FFB acceptance, FFB processing until the delivery of CSPO / CPO to meet the RSPO certification and other certifications in the mill areas. 	
Person in charge based on those procedures, among others:	
<ul style="list-style-type: none"> Security officer: recording all the expeditions of FFB and dispatch of CSPO / CPO. Weighing officer (weighbridge): weighing all received FFB and delivered products and identifies the certified or non-certified products. Logistic: calculating the production results, dispatch, production reports, delivery reports and CSPO / CPO traceability. Sorting officers: Performed FFB grading according to the standards set. Head of Administrator: Monitoring the acceptance of FFB and CSPO/CPO. 	

- Mill Head: Guarantee the whole processing.

There is also evidence that the implementation of SCCS training has been carried out, among others:

- Minutes of SCCS Training, on June 29, 2015 in Senabah Estate (The Trainer is Dedi Sanjaya, Head of Logistic), The material consists of: SOP of FFB Acceptance, SOP of Mass Balance, SOP of CPO sales, SOP of CPO Shipment, attached the attendance list of Participants and Photographs of the implementation
- Minutes of CSSC Training, on February 3, 2016 (The Speaker is Eka Amana, Sustainability), attached the attendance list of Participants and Photographs of the implementation.

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

Status: Comply

E.3.2

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

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

1. SOP of Mass Balance No. SOP 12/ADM-ANI/(00)0112 effective on January 1, 2012 which contains explanations:
 - Incoming FFB process, including through the data input of nucleus and outer FFB acceptance (outsider) with Sustainable FFB status (certified) and Non Sustainable FFB (non-certified) in the appropriate columns.
 - FFB data input process to be a Production Supervisor reports and reports of CPO / PK generated from sounding reports to determine the OER / KER and physical stock of CPO / PK in the appropriate columns.
 - Data input for shipments of CPO / PK from the mill process according to its status (Sustainable or Non-Sustainable Sustainable CPO / PK) in the appropriate columns.
 - Receiving and checking the DO status from Trading Head Office (Request of CSPO or non CSPO).
 - Based on the status of DO Request and the conditions of stock balance, determine the delivery types of CPO / PPK to be performed.
 - Fill the number for CPO / PK shipments according to the number and its status within the dispatch table and update the stock balance conditions based on the comparison of incoming and dispatch.
2. SOP of FFB acceptance (SOP 02/SRT-ANI/ (01)/0113, revision 01, effective on January 8, 2013 and SOP of FFB acceptance from the outside (SOP 03/SRT-ANI/ (00)/0211, effective on February 1, 2011).
3. SOP of CPO and PK products traceability (SOP 11 / ADM-ANI / (01) / 0314), the effective date on March 1, 2014 explaining that the facility to process the FFB into CPO and PK from certified and non-certified sources simultaneously (mixed), but in the administration / reporting stock by using separation between Mass Balance or separated between the stock of certified and non-certified CPO / PK.

Status: Comply

E.4

Purchasing and goods in

E.4.1

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

Agronusa Investama POM has done documenting the volume of certified and non-certified FFB. The mechanism is as follows:

1. Every acceptance of FFB are equipped with Delivery Order Letter detailing about the estate name, received date, Phase, Block Number, the amount of bunches, estimated tonnage, estate scales. The minutes of fruit sorting to know the quality of the fruit that comes.
2. Weigh slip (Weighbridge Slip) as a result of incoming FFB weight verification. Weighbridge slip contains information about the reference number; date: DO Number: Phase 1; Relation Code: Goods Code; Status: Purchases; Vehicle Number; Delivery Order Letter Number; Name of the driver; Information; admission hour and clocks out; Mill Gross; Tarra; Mill Netto; Dura; bunches amount; FFB Average rate; and fruit type.
3. Daily reports of mill activities including incoming FFB recapitulation from each estate. the reports are containing the

<p>information of received FFB (FFB balance), the production of CPO and PK, Extraction rate, Quality, and dispatch</p> <p>4. The monthly report of mill activities including a recapitulation of received and processed FFB, extraction rates, dispatch, quality, losses, and mills performance</p> <p>5. Mass Balance report made specifically for SCCS. The report contains the description of the recapitulations in every month and every three months for certified and non-certified fruits.</p> <p>For the verification purposes of certified FFB incoming, the company has compiled a list of certified suppliers formally issued by the management of Agronusa Investama POM. The list is used as the official guide of mill staff in running the SCCS system mainly for identification and calculation of certified FFB</p>	
	Status: Comply
E.4.2 The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	
<p>ANI POM - PT Agronusa Investama can recognize and claim the certified products for a year for CPO products: 24,422 tons and Palm Kernels: 5,963 tons for the period of April 22, 2015 until April 21, 2016.</p> <p>Based on the production data per April 2015 until February 15, 2016, the total of CPO and Kernel produced by Agronusa Investama POM: CPO = 21,068tons and Palm Kernels = 4,264tons.Based on these data, it is known that the production of certified CPO and PK does not exceed the quota that can be claimed.</p> <p>From the results of document verifications and explanations from Mill Manager, that during the period of April 2015 up to the implementation of ASA 03 (February 2016) there is no demand and sales of Certified products (CPO and PK).</p>	
	Status: Comply
E.5	Record keeping
E.5.1 a. The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis. b. All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c. The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three months. However, a site is allowed to sell short.(ie product can be sold before it is in stock.)	
<p>Based on the company's records and RSPO electronic record keeping system, during the period of 2015 to 2016, Agronusa Investama POM didn't sale CPO and PK with that claimed as RSPO certified. However, there are evidences of the balancing of all certified FFB acceptance and shipments of CPO / PK with a three-monthly basis in accordance with the applicable SOP of Mass Balance. For example, the summary of balancing for 2015 are as follows:</p>	
	Status: Comply
E.5.2 In cases where a mill outsources activities to an independent (not owned by the same organization) palm kernel crush, the crush still falls under the responsibility of the mill and does not need to be separately certified. The mill has to ensure that the crush is covered through a signed and enforceable agreement.	
<p>Until the implementation of ASA 03, Agronusa Investama POM - PT Agronusa Investama is not cooperating with the independent outsource palm kernel crushers.</p>	
	Status: Comply

3.3. Conformity Checklist of Certificate and Logo Use

1.	Evidence of permission or approval certificate and logo from Certification Body which submitted by Client	X or√
ASA-3	Since the Agronusa Investama mill earned the RSPO certificate on 22 nd April 2013, there is no sale over the certified CSPO product yet. Thus there is no usage over the certificate and logo.	NA
	Status: Not Applicable	
2.	Implementation of certificate and logo used by Client comply with size and type (shape) against Guideline of Logo Use	X or√
ASA-3	Since the Agronusa Investama mill earned the RSPO certificate on 22 nd April 2013, there is no sale over the certified CSPO product yet. Thus there is no usage over the certificate and logo.	NA
	Status: Not Applicable	
3.	Implementation of Certificate and Logo is not used on product	X or√
ASA-3	Since the Agronusa Investama mill earned the RSPO certificate on 22 nd April 2013, there is no sale over the certified CSPO product yet. Thus there is no usage over the certificate and logo.	NA
	Status: Not Applicable	
4.	Controlling of Certificate and Logo, including withdrawing inappropriate logo.	X or√
ASA-3	Since the Agronusa Investama mill earned the RSPO certificate on 22 nd April 2013, there is no sale over the certified CSPO product yet. Thus there is no usage over the certificate and logo.	NA
	Status: Not Applicable	

3.4. Summary of RSPO Partial Certification.

Management unit(s) observed: 1. PT Rimba Harapan Sakti 2. PT Buluh Cawang Plantations		
2.1	There is compliance with all applicable local, national and ratified international laws and regulations.	X or√
	Based on results of verification in 2 units as an examples of the assessment, company has complied with the regulation.	
	Status: Complied	
2.2	The right to use the land can be demonstrated, and is not legitimately contested by local communities with demonstrable rights.	X or√
	Based on documents verification there is available legal documents of land use right and there is no land conflict in each sample units.	√
	Status: Complied	
6.3	There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all parties.	X or√
	There is available several procedure : <ul style="list-style-type: none"> • Standard Operational Procedure of Communication, Consultation and Coordination (No. PRO-BM.BEN-001) • Standard Operational Procedure of Land Acquisition (No. SOP-IJIN LAHAN&OPS-006) • Standard Operational Procedure of Conflict Resolution Mechanism (No. PRO-BNM-004) These procedures was implemented and already socialization to stakeholder.	√
	Status: Complied	
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.	X or√
	Based on verification is available evident of land acquisition and compensation in each management unit. This process was documented and the document is signed by all parties related on compensation process.	√
	Status: Complied	
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.	X or√
	Based on verification there is not primary forest replaced and the management unit is still on process to identification the High Conservation Value Area.	√
	Status: Complied	
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.	X or√
	There is no new plantings	√
	Status: Complied	
7.6	Local people are compensated for any agreed land acquisitions and relinquishment of rights, subject to their free, prior and informed consent and negotiated agreements.	X or√
	There is no new plantings	√
	Status: Complied	

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-2 Assessment

CAR No	Ref Std	Finding	Area	Grade	Time Limits	Corrective Action	Observation	Status	Closing Date
2015.1	Minor 2.1.1	<p>information on legal requirement and regulation Company has law register as an effort to obey the applicable regulation and its revision.</p> <p>However the current list has not covered the regulation for period 2013-2015.</p>	Estate and Mill	Minor	ASA - 3	Company should present the revision evidence over the mandatory legal requirement and regulation for plantation business.	<p>Root Cause The updating process of the regulations are not carried out systematically, there are many new regulations that are not included into law register.</p> <p>Corrective Action Inputting the latest regulations and removing the regulations that are no longer valid.</p> <p>Preventive Action Conduct a review to the results of the evaluation and updating the regulation list and the law requirements.</p> <p>Auditor Observation February 16, 2016 The company showed the minutes dated February 13, 2016 which explained that had been done the Revision 10 of Law Register in Estate, Environment, Employment and OHS.</p> <p>Based on the explanation above, Non conformity No. 2015.1 stated Comply.</p>	Closed	16 th February 2016
2015.2	Minor	Pengujian Air Sungai	Estate	Minor	ASA-3	Company should present	Root Cause	Closed	16 th

CAR No	Ref Std	Finding	Area	Grade	Time Limits	Corrective Action	Observation	Status	Closing Date
	4.4.1	<p>Examination result in December 2014 showed that there are no environment parameters above the maximum regulation, such as TSS, Turbidity, color, DO and Total Phosphate are in line with Government Decree No. 82 in 2001.</p> <p>However, lack of evidence to show that company has taken evaluation over the examination result.</p>				<p>the evaluation evidence over the river's water examination result, which was not in line with the applicable maximum environment parameters.</p>	<p>The condition of river water which becomes a landfill (outlet) from several companies which are operated in the river upstream.</p> <p>Corrective Action Conduct evaluation on the test results of river water quality, especially for parameters that are below the quality standards with the baseline reference to the condition of the current river environment.</p> <p>Preventive Action Maintaining the quality of effluent from the company operational results that dumped into the river is always below the quality standards that allowed.</p> <p>Auditor Observation February 16, 2016 The Company has evaluated the parameters of TSS, turbidity, color, and total phosphate in the report of Environmental Management Plan / Environmental Monitoring Plan implementation in semester 1 of 2015. The results showed that the baseline conditions and the test results of surface water in the inlet has exceeded the quality standards and the test parameters in the outlet are decreased.</p>		February 2016

CAR No	Ref Std	Finding	Area	Grade	Time Limits	Corrective Action	Observation	Status	Closing Date
							<p>The company also has shown an action plan to improve the quality of river water, among others:</p> <ul style="list-style-type: none"> • Restoration on the riparian with erosion control plants. • Monitoring the riparian areas periodically to find out the distractions. <p>Besides, the surface water testing results in first semester of 2015 showed that there are no parameters that exceeded the quality standards.</p> <p>Based on the information above, Non conformity 2015.2 with minor category stated fulfilled.</p>		
2015.3	Major 4.6.4	The management of used-pesticide packages Field observation in temporary hazardous waste landfill showed that the used packages have been stored more than the allowed storage period (≥90 days)	Estate	Major	18 th May 2015	Company should present the evidence that the hazardous waste as well as used pesticide package has been managed based on the applicable regulation.	<p>Root of problem: Transporter license has been expired (PT Primanru Jaya).</p> <p>Corrective Action:</p> <ol style="list-style-type: none"> 1. Replacing PT. Primanru Jaya to PT Mitra Karya Surya Kencana. Attached work agreement and license for Mitra Karya Surya Kencana. 2. Transporting hazardous waste by PT. Mitra Karya Surya Kencana for hazardous waste, which has been stored in temporary hazardous waste landfill in ANI and Kumpai mill on 20th April 2015 <p>Preventive Action:</p>	Closed	18 th May 2015

CAR No	Ref Std	Finding	Area	Grade	Time Limits	Corrective Action	Observation	Status	Closing Date
							1. Updating third party 's license 2. Ensuring the hazardous waste is transported before the deadline (90 days). Auditor's Observation on 18th May 2015 Company has presented the curative evidence in a form of minutes of used pesticide packages handover to collector (PT Mitra Karya) on 20 th April 2015. The Manifest is also available. Based on the curative evidence, thus CAR No. 2015.03 with a major category 4.6.4 has been closed.		
2015.4	Minor 4.7.2	Medical examination for high risk personnel The management units presented minutes of medical examination in 2015 with total examined personnel was 37 persons. Hence, lack of evidence that company implemented periodic medical examination for the entire high risk personnel especially in 2015.	Mill	Major	ASA-3	Company should present the evidence of periodic medical examination for the entire high risk personnel in mill.	Root Cause Implementation of MCU is not well coordinated. Corrective Action Perform the MCU for mill workers who have not been MCU. Preventive Action Set the MCU longer so that the mill workers who are working can be covered by MCU. Auditor Observation February 16, 2016 POM management unit showed the	Closed	12 th April 2016

CAR No	Ref Std	Finding	Area	Grade	Time Limits	Corrective Action	Observation	Status	Closing Date
							<p>evaluation evidence of MCU results in 2015 to 37 workers, however, the management unit of POM cannot show the evidence of MCU implementation periodically for all high-risk workers.</p> <p>Non conformity No. 2015.4 with Minor category appeared at the time of ASA-2 has not fulfilled until the activity of ASA-3 so that based on the RSPO Certification System annex 4.2.2.4, Non conformity No. 2015.4 with Minor category is became Major category and must be corrected at the latest of 60 days (April 18, 2016).</p> <p>Observation April 5, 2016 The company showed the minutes of MCU implementation on 15 to 16 March 2016 and the attendance list of 104 POM workers who have followed a general medical examination, audiometric, cholinesterase and or spirometry according to the job risk.</p> <p>Currently the company is still waiting for the examination results from Sakura Clinical Laboratory. Thus, the company needs to complete the recapitulation document and plans of follow up / evaluation of the MCU results, so non conformity above can be fulfilled.</p>		

CAR No	Ref Std	Finding	Area	Grade	Time Limits	Corrective Action	Observation	Status	Closing Date
							Observation April 12th, 2016 The company showed the evidence remediation such as (1) Recapitulation of MCU results of PT Agronusa Investama, dated 15-16 March 2016, (2) List of result identification of ANI POM MCU member year 2016, (3) Schedule on follow up of PT Agronusa Investama MCU result year 2016 and (4) MCU 2016 Evaluation. Based on the evidence above, non-conformity No. 2015.4 stated fulfilled.		
2015.5	Major 5.3.2	Implementation of hazardous waste management. a. Field observation in temporary hazardous waste landfill in mill and estate revealed that the hazardous waste has been stored ≥ 90 days b. The temporary hazardous waste landfill building has a hole that cause a leakage, which is potentially pollute environment c. Field observation in generator house at Kumpai Division showed that the used cloth rags have not been managed as hazardous waste.	Estate and Mill	Major	18 th May 2015	Company should present the evidence that the hazardous waste has been managed based on hazardous waste management procedure and related applicable regulations.	Root of problem: a. The transporter license of PT. Primanru Jaya is under extension process. b. The temporary hazardous landfill at mill is newly renovated and it still under the reconstruction process. c. The generator operator has not understood the management for hazardous waste. Corrective Action: a. Company has transported the hazardous waste on 20 th April 2015 (Refers to CAR No.2015.03). b. Repairing the damaged wall near to the floor in temporary hazardous waste landfill at ANI's mill. c. Delivering training for generator	Closed	18 th May 2015

CAR No	Ref Std	Finding	Area	Grade	Time Limits	Corrective Action	Observation	Status	Closing Date
							<p>operator especially on managing hazardous waste.</p> <p>Preventive Action: Ensuring the management for hazardous waste has been inline with the applicable regulation and law.</p> <p>Auditor's Observation on 18th May 2015 Company present the curative evidences, such as:</p> <ul style="list-style-type: none"> a. Minutes of hazardous waste – used pesticide packages- hand over to collector (PT Mitra Karya) along with the manifest for each hazardous waste on 20th April 2015. b. Documentation on the repair of the damaged temporary hazardous landfill wall. c. Delivering training for generator operator, especially about the hazardous waste management as well as providing the location for selecting hazardous waste before stored in the licensed temporary hazardous waste landfill. <p>Based on the aforementioned curative actions, thus the CAR No. 2015.05 with a major category 5.3.2 has been closed.</p>		

CAR No	Ref Std	Finding	Area	Grade	Time Limits	Corrective Action	Observation	Status	Closing Date
2015.6	Minor 6.1.1	Monitoring over social impact Lack of evidence the monitoring over social impact has been conducted participatory by involving affected-parties.	Estate and Mill	Minor	ASA-3	Company should present the evidence that the social impact monitoring has been conducted participatory by involving the affected-parties.	<p>Root Cause The results of evaluation of social impact management have not been included in the draft of Environmental Management Plan / Environmental Monitoring Plan report in second Semester of 2014.</p> <p>Corrective Action Perform social impact monitoring in a participatory manner through questionnaires / FGD.</p> <p>Preventive Action Ensuring the social impact monitoring report conducted in a participatory manner with the affected parties, and inputting the social impact monitoring report into Environmental Management Plan / Environmental Monitoring Plan every 6 months.</p> <p>Auditor Observation February 16, 2016 Has been showed the record evidence:</p> <ul style="list-style-type: none"> Documents of Environmental Management Plan / Environmental Monitoring Plan Implementation Report in first Semester of 2015. In the document has been explained about the social impacts which are monitored and managed, among others, Public Unrest and Job Opportunities. 	Closed	16 th February 2016

CAR No	Ref Std	Finding	Area	Grade	Time Limits	Corrective Action	Observation	Status	Closing Date
							<ul style="list-style-type: none"> Summary of information collection practices to arrange the monitoring plan and social impact management. <p>Based on the evidence above, then non conformity on this indicator stated fulfilled.</p>		
2015.7	Minor 6.5.2	Evaluation on contractor compliances on the requirements. Company requires contractors to fulfill the required manpower regulation such as manpower social insurance, which is stated clearly on the work agreement. However, lack of evidence that the company has undertaken evaluation on contractors.	Estate	Minor	ASA-3	Company should present the evidence over contractors' evaluation in term of their compliance toward manpower regulation.	Root Cause Not to evaluate the requirements of contractors. Corrective Action Conduct an evaluation of all contractors who are working in the company's environment on the compliance of Cooperative Agreement Letter requirements. Preventive Action Only use a contractor who meets the requirements of companies. Auditor Observation February 16, 2016 The company showed Letter No. 007 / ANI-Sbs / VI / 2015 dated June 1, 2015, concerning a call for all contractors of PT ANI Sambas related to the requirements compliance within the Cooperative Agreement Letter. As an evidence of contractor evaluation, the company showed Letter No. 008 / ANI-Sbs / XII /	Closed	16 th February 2016

CAR No	Ref Std	Finding	Area	Grade	Time Limits	Corrective Action	Observation	Status	Closing Date
							<p>2015 dated December 14, 2015 regarding to the evaluation of CV Pulau Indah contractors in the compliance with the requirements of labor laws in Labor Social Insurance Agency membership. Furthermore, the company showed the evidence of payment dues document of Labor Social Insurance Agency of CV Pulau Indah for 11 workers on February 12, 2016.</p> <p>Based on the explanation above, non-conformity No. 2015.7 stated fulfilled.</p>		
2015.8	SCCS point 2.1 (Module E Ver. Nov. 2011)	Verification on certified and noncertified FFB Lack of evidence that company has verified the source of certified and non-certified FFB on FFB's acceptance process.	Mill	NC	18 th April 2015	Company should present the evidence that it has conducted verification during the FFB's acceptance, whether the FFB comes from certified or non-certified sources.	<p>Root of problem: The absence of verification facilities, such as list of supplier as a tool to identified certified and non-certified source.</p> <p>Corrective Action: Develops list of RSPO certified and non certified supplier</p> <p>Preventive Action: Ensuring the list of supplier is available in mill and always updated.</p> <p>Auditor's Observation on 18th April 2015 For the verification of the incoming certified FFB, PT. ANI has drafted and issued list of supplier. The list could be</p>	Closed	18 th April 2015

CAR No	Ref Std	Finding	Area	Grade	Time Limits	Corrective Action	Observation	Status	Closing Date
							used as the official guide for mill's staff to implement the SCCS system, especially to identified and calculate the certified FFB.		
2015.9	SCCS point 5.1 (Module E Ver. Nov. 2011)	Training on the implementation of SCCS Lack of evidence that the training has been delivered to the entire staff who work on the implementation of SCCS, including mill's manager at ANI POM mill.	Mill	NC	18 th April 2015	Company should present the evidence that the training has been conducted for the entire staff who work on the implementation of SCCS	Root of problem: There are some staffs who have not received the SCCS training, including the manager at ANI Sambas Mill. Corrective Action: Delivering SCCS training to mill's manager, Mr. Sutarno and logistic staff, Mr. Dedi Sanjaya who were identified have not received the SCCS training. Preventive Action: Ensuring the entire related-staff has received the SCCS training and they understand the supply chain system. Auditor's Observation on 18th April 2015 In order to ensure the understanding of personnel, company has conducted training for related staff including for mill's manager (Mr. Sutarno) on 14-15 th April 2015 based on minutes of training as well as attendance sheet.	Closed	18 th April 2015

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

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

CAR No	Ref Std	Finding	Area	Grade	Time Limits	Corrective Action	Observation	Status	Closing Date
							<p>procedures in response to requests for information</p> <ul style="list-style-type: none"> Preventive action: PIC who is responsible for incoming and outgoing mail must ensure that the response letter must be sent within 14 days. PIC: Iswardi, Nunung, Iqbal Raihani. Evidence: Logbook incoming and outgoing mail. Auditor Observation: April 5th 2016 The company showed Letter No. 023/BM-ANIS/EXT/III/2016 dated March 30, 2016 regarding the response to the letter from the Board of Investment and Integrated licensing Services No. 582/324/BMPPT-4/2015 which has been accepted by the relevant agencies on April 1, 2016 in accordance with the receipt documents. May 23rd 2016 The Company showed document Socialization Response Procedures Flow Request Information dated April 18, 2016 submitted to the officer responsible for receiving requests for information in the form of a letter or email and recalls the response 		

CAR No	Ref Std	Finding	Area	Grade	Time Limits	Corrective Action	Observation	Status	Closing Date
							<p>deadline is 14 days since the request for information is received. The company also shows the log book recording incoming and outgoing mail, equipped with a response date information to ensure that the deadline for responses in accordance with procedures established by the company (14 days).</p> <p>• Auditor Conclusion: Based on the evidence submitted relating to corrective and preventive actions are determined by the company, non-conformity No. 2016.01 stated fulfilled.</p>		
2016.2	Minor 4.6.4	<p>Pesticide use reduction program with category of Class 1B WHO</p> <p>The company could not show a reduction program in the use of pesticide with the active ingredient of <i>Coumatertraly</i> in rat pest control.</p>	Estate and Mill	minor	ASA-4	The company must be able to show the reduction program in the use of pesticide with the active ingredient of <i>Coumatertraly</i> which is a pesticide Class 1B category of WHO, in the rat pest control.	<ul style="list-style-type: none"> • Root cause: • Corrective action (+evidence) • Preventive action: • Auditor conclusion: 	Open	
2016.3	Minor 6.1.4	<p>Plans should be reviewed at least two years and updated as necessary by involving the affected parties.</p> <p>PT ANI already has a Report of Environmental Management Plan/Environmental Monitoring Plan Implementation and Report of Social Impact Study consists of Management and Monitoring Plan in 2011 to 2015.</p>	Estate and Mill	minor	ASA-4	The company must be able to show the evidence that has been done the review at least two years on the plans and the process of the review by involving the affected parties.	<ul style="list-style-type: none"> • Root cause: • Corrective action (+evidence) • Preventive action: • Auditor conclusion: 	Open	

CAR No	Ref Std	Finding	Area	Grade	Time Limits	Corrective Action	Observation	Status	Closing Date
		However, it is not yet enough evidence that has been done review at least two years on the plans and the process of the review by involving the affected parties.							
2016.4	Minor 6.5.3	Planters and Palm Oil Mill Employers must provide adequate housing. Based on the observations during field visit on the Mill Employees Housing, there are some houses in poor condition (for example, the walls were cracked/broken) and sanitary conditions around the housing area are inadequate.	Estate and Mill	minor	ASA-4	The company must provide adequate housing facilities and adequate sanitation conditions.	<ul style="list-style-type: none"> • Root cause: • Corrective action (+evidence) • Preventive action: • Auditor conclusion: 	Open	
2015.5	RSPO Cert. System 4.2.4	Implementation of Time Bound Plan PT ANI has had the scheme smallholders since 2010 but has not been included in the Time Bound Plan.	Estate and Mill	minor	ASA-4	The company must be able to show the proof that the scheme smallholders have been included in the Time Bound Plan and implemented.	<ul style="list-style-type: none"> • Root cause: • Corrective action (+evidence) • Preventive action: • Auditor conclusion: 	Open	

3.5.3 Opportunity for Improvement

No	Ref Std	Descriptions
1	Major 2.2.1	The company needs to follow up and ensure the progress of HGU Certificate maintenance (follow up the Request of Plot Revision on behalf of PT Agronusa Investama based on the letter from the Director of PT Agronusa Investama No: 054 / ANI-BM / HGU / IX / 2014, dated September 22, 2014 to the National (National Land Agency) West Kalimantan Province) and ensure the Moratorium Status(Observation).
2	Major 4.7.3	The company needs to ensure the availability of appropriate protection equipment for all workers and the availability of PPE minimum stock in accordance with the management of PPE.
3	Minor 4.7.5	a. The company needs to evaluate the readiness and alertness of the Emergency Response Team in the POM in fire prevention and fire countermeasures. b. Availability of First Aid equipment according to the job risk and recommendations of company paramedics.
4	Major 5.3.2	The Company has an opportunity to evaluate the mechanism of Hazardous Waste delivery period to the official transporter.
5	Major 7.3.1 Major 7.3.2	HCV Identification in the company operational conducted on 2009 and during the period of 2005 to 2009, the company has made new planting of oil palm. In this regard the company has analyzed the change in land covers (Land Use Change Analysis), and submitted a report of <i>disclosure</i> and <i>compensation liability</i> related to the opened area after the period of November 2005 without preceded by the identification of HCV to Dillon Samrin through email on April 8, 2015 (rspo.compensation@rspo.org). Until ASA-3 assessment activities take place the RSPO is still verifying the reports of disclosure and compensation liability submitted by the company.

3.5.4 Noteworthy Positive Components

No	Ref Std	Descriptions
1		The Company is committed to the management of sustainable palm oil through the RSPO certification
2		Personnel of Estate and Mill in PT ANI Sambas competent for their respective fields and the provision of documents is quick, helping the audit operations run smoothly
3		The company has conducted the Partnership Cooperation Agreement with the surrounding communities through the Cooperatives of Sentama Lestari and Cempaka Biru.



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

Public Issues (Institution/ NGO/Community)	Management Responses	Auditor Responses
<p>Sepantai Village Public consultation in this village was conducted through Focus Group Discussion with the Village Chief, Community Leader, Representative Body of Village Community and Community Representatives). The interview Points, among others:</p> <ul style="list-style-type: none"> • The positive impact from land clearing is open jobs for local community. • Has established cooperation for the programs of scheme smallholders between Sepantai Village with PT Agronusa Investama. • The spacious of Sepantai Village Smallholdings is 34 hectares • The company ever to provide assistance, such as heavy machinery to repair the roads in the village in 2010 • Until now there has been no activity / routine programs from the company to the communities in Sepantai village • There are no issues related to the negative impact on the environment caused by the management of estate and mill in PT Agronusa Investama. • Currently there are no issues or conflict in the management of land that occurs between the communities with the company. • Problems from current smallholdings management, among others: <ul style="list-style-type: none"> - There are a few of the smallholdings which has been switched ownership because it has been sold by the first owner to the party / other people. - Lack of supervision from the supervisor on the plant maintenance activities - Maintenance Wage is relatively low so that the workers are less interested to do it 	<p>There are a few of the smallholdings which has been switched ownership because it has been sold by the first owner to the party / other people.</p> <p><i>Smallholdings Ownership is still in accordance with the Smallholders / Land Candidates, where to make a change must be approved back by the Regent. As long as no changes in the legal, the ownership is still referring to the existing Smallholders / Land Candidates,</i></p> <p><i>Although there has been buying and selling of some people, then it can be happened under the hand, which is very difficult for the Company to conduct the prevention and it is common in the smallholdings project throughout Indonesia both the programs of PIR, KKPA, revitalization or other smallholdings system. Especially for PT. ANI if it is happened, its only concerns the revenue of their smallholdings rights, where the company did not intervene up to the limit, because the land belonging to the village wealth that will be the Land Use Title on behalf of Cooperative. However, whatever is happened between them will not be changed the land status became non smallholdings. Therefore, in the nucleus land if there is happened buying and selling of shares, PT. ANI does not change the status of the land or Land Use Title of Nucleus Land.</i></p>	<ul style="list-style-type: none"> • There are no negative issues and complaints from the communities related to the negative impact from the estate and mill management. • Not found the existence of issues about the conflict between the company and surrounding communities in the management of estate and mill • Sepantai village has formed a partnership with the company through co-management of smallholdings incorporated in the Cooperative of Sentama Lestari.

Public Issues (Institution/ NGO/Community)	Management Responses	Auditor Responses																				
	<p>Lack of supervision from the supervisor on the mill maintenance activities</p> <p>In the field operations there is no difference between the nucleus and the smallholdings, each job has been determined by supervisors / each supervisor. Here are the names of existing maintenance supervisor in the field:</p> <table><tr><th>No</th><th>Work Types</th><th>Sentama Lestari</th><th>Cempaka Biru</th></tr><tr><td>1.</td><td>Manuring/Fertilizer</td><td>Faisal</td><td>Hairani</td></tr><tr><td>2.</td><td>Spray</td><td>Awal Murni</td><td>Tri Sutrisno</td></tr><tr><td>3.</td><td>Circle Weeding</td><td>Budi</td><td>Syarie</td></tr><tr><td>4.</td><td>Selective Weeding</td><td>Rapizal</td><td>Abdullah</td></tr></table> <p>From these data, that every job has been determined the supervisor so that the supervision of the work will always be maximum.</p> <p><u>“Maintenance Wage is relatively low so that the workers are less interested toto do it”</u></p> <p>In the payment of employee's wage, there is no difference between the nucleus and the smallholders; it is based on the Sectoral Minimum Wage of District.</p> <p>Contractual / whole sale in the maintenance job has been communicated between the cooperative and the garden, both in the price and the job technical.</p> <p>All maintenance activities have been implemented according to the program and its rotation, even for contractual maintenance work by using local</p>	No	Work Types	Sentama Lestari	Cempaka Biru	1.	Manuring/Fertilizer	Faisal	Hairani	2.	Spray	Awal Murni	Tri Sutrisno	3.	Circle Weeding	Budi	Syarie	4.	Selective Weeding	Rapizal	Abdullah	
No	Work Types	Sentama Lestari	Cempaka Biru																			
1.	Manuring/Fertilizer	Faisal	Hairani																			
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3.	Circle Weeding	Budi	Syarie																			
4.	Selective Weeding	Rapizal	Abdullah																			

Public Issues (Institution/ NGO/Community)	Management Responses	Auditor Responses
	contractors (surrounding communities) based on the proposals from the cooperative itself.	
The board of KUD Sentama Lestari and KUD Cempaka Biru <ul style="list-style-type: none"> • A cooperation agreement for the management of smallholdings carried out in 2010. • The management of smallholdings are fully performed by the company • There is one person appointed by the cooperative for monitoring the activities of the smallholdings management by PT Agronusa Investama. • There are no issues related to the negative impact on the environment caused by the management of estate and mill in PT Agronusa Investama. • Currently there are no issues or conflict in the management of land that occurs between the communities with the company. • Problems from current smallholdings management, among others: <u>Aspiration:</u> <ul style="list-style-type: none"> • Management training by the company, to increase the ability of smallholder cooperative management. • Improvement of access roads in some areas towards smallholdings. 	<p>Relations of cooperation between the company and the management and members of Sentama Lestari Cooperative have gone well and will always try to help the progress of the cooperative organizations and its members.</p>	<p>There are two cooperation agreements between PT ANI Sambas with each cooperative management for smallholders program, namely:</p> <ul style="list-style-type: none"> • Partnership Cooperation Agreement, dated December 9, 2010. The agreement is the basis in the Construction Framework and Oil Palm Plantation Management of Partnership Pattern, Plantation Revitalization Program Covering an area of \pm 733 hectares in the villages of Semanga, Sepantai, Sejangkung District And Beringin Village of Sajad District, Sambas Regency of West Kalimantan Province. <p>Partnership Cooperation Agreement, dated December 9, 2010. The agreement is the basis in the Construction Framework and Oil Palm Plantation Management of Partnership Pattern, Plantation Revitalization Program Covering an area of \pm 472 hectares. In Sajingan Kecil Hutment, Semanga Village, Sejangkung District of Sambas Regency, West Kalimantan Province.</p>
Female Committee of PT ANI Sambas. <ul style="list-style-type: none"> • There is a representative board of female committees in each division. Throughout the years of 2014 to 2015 until now, there are no cases of complaints related to the sexual harassment. • Committee routine socialization through Maternal and Child Health Center activities and monthly recitation. 	<p>The company is committed to fulfill the female rights.</p>	<ul style="list-style-type: none"> • There are no issues of female workers' rights violations and other issues, such as sexual harassment, and violence against women. <p>The Company has provided an opportunity to formed a female Committee which aimed to protect the rights of women and containers to deliver the aspirations and grievances.</p>

Public Issues (Institution/ NGO/Community)	Management Responses	Auditor Responses
The head of Indonesian Worker Unions of PT ANI Sambas. <ul style="list-style-type: none"> • The company gives freedom to workers to organize. The workers union at PT ANI Sambas has gone well since 2012 and there are representatives in every estate. • Bipartite cooperation has gone well. Last talks regarding the fulfillment of the minimum wage in 2016 and wholesale prices for harvesters according to the tonnage in 2016. • There were no reports of industrial relations problems in last one year. 	<p>The Company has granted the freedom to workers to organize and fulfill their rights.</p>	<ul style="list-style-type: none"> • There were no issues related to the industrial conflicts between the company and employees. <p>The company has given the freedom to the employees to organize and use the company's facilities in supporting the workers' organizations activities.</p>
Local Contractor – CV Pulau Indah <ul style="list-style-type: none"> • The work agreement has been made fairly, openly and transparently and also agreed by both parties. • Payment for the work has been done by the company in a timely manner and in accordance with the agreement on the work agreement. • The relationships and communication between the companies with the contractor has gone well. 	<p>The company has always tried to establish good cooperation with contractors.</p>	<ul style="list-style-type: none"> • There were no complaints from contractors related to the transparency of contracts and payment systems. • Access for the contractors on the work has been based on the openly system for all contractors in accordance with the technical capabilities of each contractor. • The work agreement between the company and contractors has included clauses about several things, among others: the scope of work, rights and obligations of each party, payment mechanisms, aspects of Health and Safety Work and Insurance from the workers / contractor personnel.

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 style="text-align: center;">Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end; padding-top: 50px;"> <div style="text-align: center;"> <p>PT Agronusa Investama Sustainability Controller Wilmar Group</p>  <p><u>Simon Siburat</u> Monday, May 23rd 2016</p> </div> <div style="text-align: center;"> <p>PT Mutuagung Lestari Lead Auditor</p>  <p><u>Oktovianus Rusmin</u> Monday, May 23rd 2016</p> </div> </div>

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

No	Institution/NGO/Community	Address	Phone/Email	Form of Communication	Date of Contact	Response	
						Yes	No
1	National Land Agency (Badan Pertanahan Nasional) District of Sambas	District of Sambas	info@sambas.go.id	Letter and questionnaire via email	11 February 2016		✓
2	State Ministry for Environment (Badan Lingkungan Hidup Daerah) District of Sambas	District of Sambas	info@sambas.go.id	Letter and questionnaire via email	11 February 2016		✓
3	State Department of Forestry and Estate Crops (Dinas Kehutanan dan Perkebunan) District of Sambas	District of Sambas	info@sambas.go.id	Letter and questionnaire via email	11 February 2016		✓
4	State Department of Manpower, Social and Transmigration (Dinas Tenaga Kerja, Transmigrasi dan Sosial) District of Sambas	District of Sambas	info@sambas.go.id	Letter and questionnaire via email	11 February 2016		✓
5	NGOs (Sawit Watch, Walhi and WWF Indonesia)	-	info@sawitwatch.or.id info@sawitwatch.or.id wwf-indonesia@wwf.or.id	Letter and questionnaire via email	12 February 2016		✓
6	Local NGO Lembaga Gemawan	Jl. Batas Pandang Kompleks Kelapa Hijau No. 18, Pontianak 78117, Kalimantan Barat	+62-561-586891 +62-561-586891 www.gemawan.org	Letter and questionnaire via email	12 February 2016		✓
7	Community leaders of Sepantai Village	Sub. District of Sejangkung, District of Sambas, Province of Kalimantan Barat	-	Direct interview	16 February 2016	✓	
8	The board of Plasma Sentama Lestari	Sub. District of Sejangkung, District of Sambas, Province of Kalimantan Barat	-	Direct interview	17 February 2016	✓	
9	The board of Plasma Cempaka Biru	Sub. District of Sejangkung, District of Sambas, Province of Kalimantan Barat	-	Direct interview	17 February 2016	✓	
10	Worker union	Sub. District of Sejangkung, District of Sambas, Province of Kalimantan Barat	-	Direct interview	17 February 2016	✓	
11	Local contractor	Sub. District of Sejangkung, District of Sambas, Province of Kalimantan Barat	-	Direct interview	17 February 2016	✓	

Appendix 2. Assessment Program

DATE		15 – 20 February 2016	
PLANNED TIM	ACTUAL DURATION	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 15 February 2016			
06.00 - 07.00	06.00 - 07.00	Flight from Jakarta to Pontianak	All Auditors
08.00 - 17.00	08.00 - 17.00	Traveling Pontianak – Plantation Area of PT AGRONUSA INVESTAMA	
Tuesday, 16 February 2016			
08.00 – 08.30	08.00 – 08.30	Opening Meeting <ul style="list-style-type: none">Auditee Speech (Introduction of PIC, Profile of Mill and Estates Management Unit)Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Determine of Field Visit Audit, Transparency and Confidentiality Clarification)	All Auditors
09.00 – 12.00	09.00 – 12.00	<ul style="list-style-type: none">Review of Previous Visit Non-conformance (ASA 02)Document Review	All Auditors
12.00 – 14.00	12.00 – 14.00	BREAK	
14.00 – 16.00	14.00 – 16.00	Field Observation to ANI Sambas POM <ul style="list-style-type: none">Supply Chain verificationFFB Receiving, Weighbridge, FFB Sorting, Processing Activity, Dispatch CPO)Environmental , Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, POME Pond)Occupational Health & Safety Aspect, Interview with Worker's Union Mill, Local Contractor, Gender Committee	ORN MAH SMM NKA
16.00 – 17.00	16.00 – 17.00	Field Observation Clarification	All Auditors
Wednesday, 17 February 2016			
08.00 - 12.00	08.00 - 12.00	Stakeholder consultation with the nearest village	ORN SMM SMM MAH MAH NKA NKA NKA
		Field Observation: Senabah Division (North): <ul style="list-style-type: none">Legal boundary, HCV management area, land fire, etc.Waste management (hazardous storage, solid waste, landfill, sanitary, etc).Manuring, Spraying, Harvesting, IPM, Workers safety, etc.Workers facilities (housing, worship, health care, school, union, etc) and	
		Kumpai Division (South): <ul style="list-style-type: none">Manuring, Spraying, Harvesting, IPM, Workers safety, etc.Workers facilities (housing, worship, health care, school, union,etc)Waste management (hazardous storage, solid waste, landfill, sanitary,etc).	
12.00 – 14.00	12.00 – 14.00	BREAK	

DATE		15 – 20 February 2016	
PLANNED TIM	ACTUAL DURATION	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
14.00 – 16.00	14.00 – 16.00	Continue of Field Observation in Kumpai Division • Legal boundary • HCV management area, land fire, etc	ORN SMM
16.00 – 17.00	16.00 – 17.00	Field Observation Clarification	All Auditors
Friday, 19 February 2016			
08.00 – 12.00	08.00 – 12.00	Data Reconfirmation & Completion of Check List	All Auditors
12.00 - 14.00	12.00 - 14.00	BREAK	
14.00 – 16.00	14.00 – 16.00	Team Auditor Meeting (Preparation for Audit Conclusion)	All Auditors
16.10 – End	16.10 – 17.30	Closing Meeting	All Auditors
Saturday, 20 February 2016			
07.00 – 15.00	07.00 – 15.00	Traveling from Plantation Area to Pontianak	All Auditors
17.45 – 19.45	17.45 – 19.45	Flight from Pontianak to Jakarta	All Auditors