

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

Stage-1 Stage-2 Surveillance Re-Certification

Name of Management Organisation : Brahma Binabakti Palm Oil Mill – PT Brahma Binabakti
 Plantation Name : PT Brahma Binabakti supplied by Brahma Bina Bakti Estate.
 Location : Village of Suko Awinjaya, Sub District of Sekernan, District of Muaro Jambi, Province of Jambi, Indonesia.
 Certificate Code : **MUTU-RSPO/114**
 Date of Certificate Issue : 26 May 2015 Date of License Issue : 26 May 2018
 Date of Certificate Expiry : 25 May 2020 Date of License Expiry : 25 May 2019

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-3	19 to 23 March 2018	Andi Pratama Pasaribu (Lead Auditor), Trismadi Nurbayuto, Brigitta Prita and Yudhi Yuniarto	Ardiansyah	Octo HPN Nainggolan

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-3	28 May 2018

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Figure 1. Location Map of PT Brahma Binabakti.

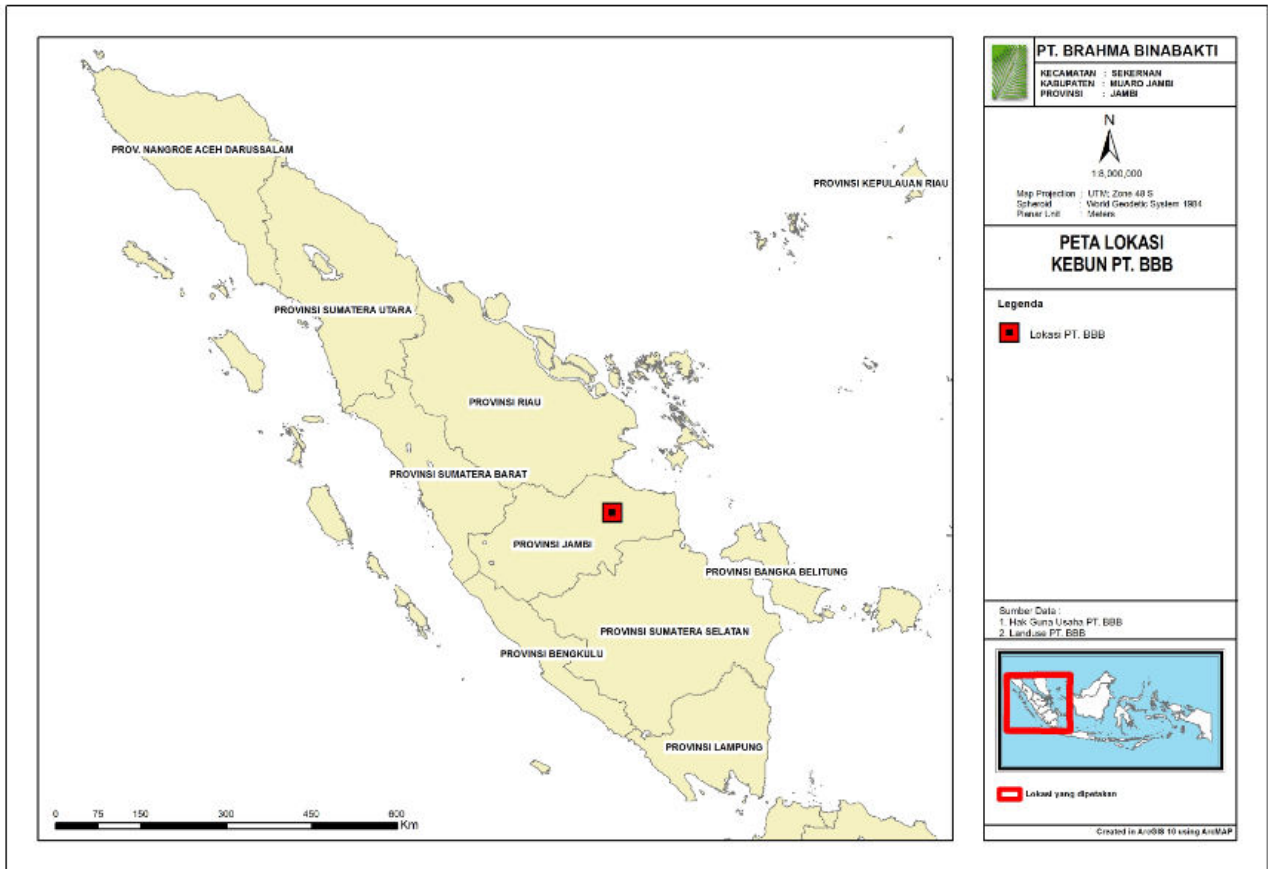
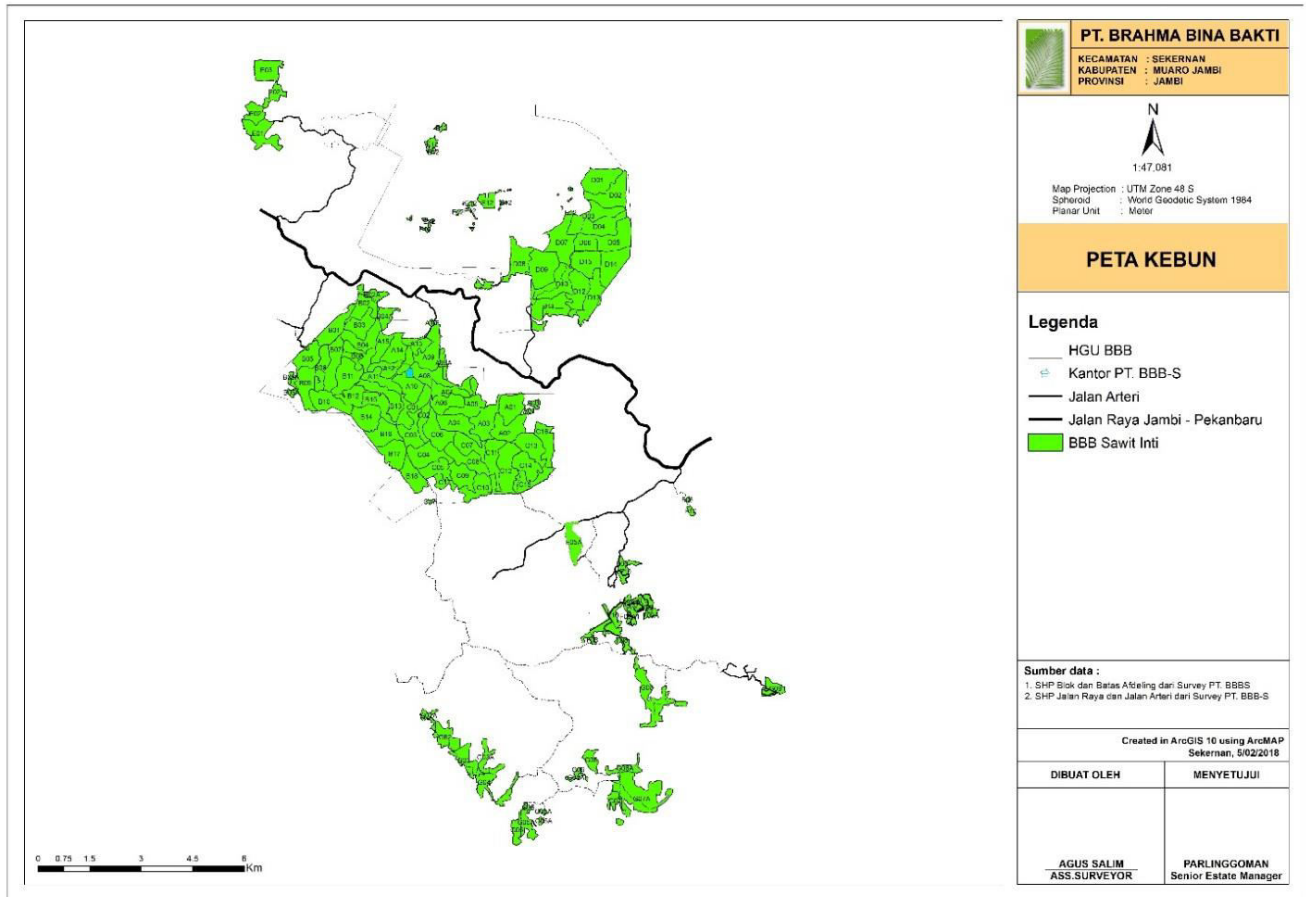


Figure 2. Operational Map of PT Brahma Binabakti.



Abbreviations Used

ASA	:	Annual Surveillance Assessment
BBB	:	Brahma Binabakti
CH	:	Certificate Holder
CPO	:	Crude palm oil
EFB	:	Empty Fruit Bunch
EIA	:	Environmental Impact Assessment
FFB	:	Fresh Fruit Bunch
HCV	:	High Conservation Value
HGU	:	Land Use Title
HIRARC	:	Hazard identification Risk Assessment Risk and Risk Controlling
IPB3	:	Ikatan Pekerja Brahma Binabakti (<i>Labor Union</i>)
IPM	:	Integrated Pest Management
EWS	:	Early warning system
LA	:	Land Application
LCC	:	Legume Cover Crop
LUCA	:	Land Use Change Analysis
NGO	:	Non Government Organization
OER	:	Oil Extraction Rate
PIC	:	Person In Charge
PK	:	Palm Kernel
POM	:	Palm Oil Mill
PPE	:	Personal Protective equipment
RJP	:	Rencana Jangka Panjang (Long-term plan).
RKL	:	Rencana Pengelolaan Lingkungan (<i>Environment Management Plan</i>)
RPL	:	Rencana Pemantauan Lingkungan (<i>Environment Monitoring Plan</i>)
RSPO	:	Roundtable Sustainable Palm Oil
RTE	:	Rare, Threatened or Endangered
SCCS	:	Supply Chain Certification Standard
SIA	:	Social Impact Assessment
SOP	:	Standard Operational Procedure
SPSI	:	Serikat Pekerja Seluruh Indonesia (<i>Labor union</i>).
WTP	:	Water Treatment Plant
WWTP	:	Waste Water Treatment Plant

1.0	SCOPE of the CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used	<ul style="list-style-type: none"> • <i>Indonesian National Interpretation of RSPO Principles and Criteria 2013 by INA-NITF, July 2016 (Endorsed by the RSPO Board of Governors meeting on 30th September 2016)</i> • <i>RSPO Supply Chain Certification Standard For organization seeking or holding certification, Adopted by the RSPO Board of Governors on 21 November 2014 (Revised on 14 June 2017)</i> 	
1.2	Organisation Information		
1.2.1	Organisation name listed in the certificate	PT. Brahma Binabakti	
1.2.2	Contact person	Irvan Nurmansyah	
1.2.3	Organisation address and site address	Jl. Lingkar Barat III No. IA, RT 07, Kelurahan Kenali Besar, Kecamatan Kota Baru, Kota Jambi, 36113, Indonesia	
1.2.4	Telephone	0741 - 5917913	
1.2.5	Fax	0741 - 5917913	
1.2.6	E-mail	George.oetomo@tap-agri.com	
1.2.7	Web page address	http://www.tap-agri.com	
1.2.8	Management Representative who completed the application for certification	Dian Novita Putri	
1.2.9	Registered as RSPO member	1-0147-13-000-00 since 6 December 2013	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Palm Oil Mill and supply base: Brahma Binabakti Mill and Brahma Binabakti Estate	
1.3.2	Type of certificate	Single Certificate issued by Sucofindo International Certification Services on 26 May 2015 and transferred to PT. Mutuagung Lestari on 14 February 2018	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			Latitude Longitude
	Brahma Binabakti	Village of Suko Awinjaya, Sub District of Sekernan, District of Muaro Jambi, Province of Jambi, Indonesia.	S 01° 20' 52.81" E 103°19' 33.20"

1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			Latitude
	Brahma Binabakti Estate	Village of Suko Awinjaya, Sub District of Sekernan, District of Muaro Jambi, Province of Jambi, Indonesia	S 01° 21' 38" E 103° 21' 38"
1.5	Description of Area Statement		
1.5.1	Tenure		
	• State		7,227.35 Ha
	• Community		- Ha
1.5.2	Area Statement		
	• Total area		7,227.09 Ha
	• Mature area		4,352.09 Ha
	• Immature area		- Ha
	• Mill and Mill Emplacement		217.18 Ha
	• Plasma		189 Ha
	• Emplacement and Building		18.67 Ha
	• HCV (including planted)		32.78 Ha
	• Unplantable Area		244.40 Ha
	• Rubber Plantation		2,172.97 Ha
	<i>Source: hectar statement data per March 2018.</i> <i>Note: There is a discrepancy 0,27 Ha with the hectare statement due to different technical measurement.</i>		
1.6	Planting Year and Cycles		
1.6.1	Age profile of planting year		
	Planting Year	Hectarage (Ha)	
		Brahma Binabakti Estate	Total
	1994	1,006.45	1006.45
	1995	1,161.10	1161.10
	1996	848.07	848.07
	1997	185.11	185.11
	1998	397.14	397.14
	2005	28.08	28.08
	2006	279.21	279.21
	2007	446.93	446.93
	TOTAL	4,352.09	4,352.09
	<i>Source: hectar statement data per March 2018</i>		
1.6.2	New Planting area after January 2010		- 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		Palm Kernel	
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)
	Brahma Binabakti	60	319,736	64,107	20.05	16,658	5.21
	<i>*Production data source from March 2017 to February 2018</i>						
1.7.2	Description of Certification Scope of Supply Base						
	Name of Estate	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)	Supplied to Mill	
						FFB (tonnes/year)	%
	Brahma Binabakti	7,227.09	4,352.09	82,693	19.00	82,693	100
	TOTAL	7,227.09	4,352.09	82,693	19.00	82,693	100
	<i>*Processing data source from March 2017 to February 2018</i>						
1.7.3	FFB description from other source						
	Name of Sources/Organisation (RSPO certified / non-certified)	Type of Organisation	Number of smallholders	Production Area (Ha)	Supplied to Mill		
					FFB (tonnes/year)		
	Brahma Binabakti Estate (Non HGU) (Non Certified Area)	PT Brahma Binabakti	-	424.45	7,068.70		
	Plasma 1 (Non Certified Area)	Associated smallholder	1,505	4,278	89,002.44		
	Plasma 2 (Non Certified Area)	Associated smallholder	377	1,848	23,448.24		
	Plasma Pelayung (Non Certified Area)	Associated smallholder (fully managed by CH)	202	414	7,173.92		
	PT. Mendalo Prima Intiland (Non Certified Area)	Independent supplier	-	-	148.00		
	Jaya Mulya (Non Certified Area)	Independent supplier	-	-	3,404.26		
	Bintang Utama (Non Certified Area)	Independent supplier	-	-	2,905.08		
	CV Tugino (Non Certified Area)	Independent supplier	-	-	2,238.37		
	Sinar Jaya (Non Certified Area)	Independent supplier	-	-	2,872.35		
	Independent smallholder (Non Certified Area)	Independent smallholder	-	-	98,781.68		
	TOTAL					237,043.03	
	<i>*Production data source from March 2017 to February 2018</i>						
1.7.4	Product categories			FFB, CPO, PK			
1.8	Tonnage of Product						
1.8.1	Past Annual Claim Certified Product		Previous Certificate Claim May 26 th 2017 to May 25 th 2018 (tonnes/year)		Actual certified product May 26 th 2017 to March 17 th 2018 (tonnes/year)		
	• FFB Production		-		65,922		
	• CPO Production		15,655		14,363		
	• Palm Kernel (PK) Production		3,787		3,258		
1.8.2	Product selling						
	Tonnage of selling product			Period of actual selling product (May 26 th 2017) to (March 17 th 2018)			
	• CSPO sold as RSPO certified product			-			

	<ul style="list-style-type: none"> • CSPK sold as RSPO certified product • CSPO sold under other scheme • CSPK sold under other scheme • CSPO sold as conventional • CSPK sold as conventional 	1,691	-	-	14,363	-		
1.8.3	Estimate of Certified FFB Claim							
	Name of Estate(s)	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)			
	Brahma Binabakti Estate	7,227.09	4,352.09	91,394	21			
	TOTAL	7,227.09	4,352.09	91,394	21			
	<i>*Projected FFB production for 26 May 2018 to 25 May 2019</i>							
1.8.4	Estimate of Certified Palm Product Claim							
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel	Supply Chain Module	
				Out put (tonnes)	Extraction (%)	Out put (tonnes)		Extraction (%)
	Brahma Binabakti	60	91,394	19,193	21.00	Di pen	5.21	MB
	<i>*Projected CSPO and CSPK production for 26 May 2018 to 25 May 2019</i>							
1.9	Other Certifications							
	ISO 9001:2008			-				
	ISO 14001: 2004			-				
	OHSAS 18001:2007			-				
	ISCC			-				
	ISPO			PT Brahma Binabakti has achieved ISPO certified since 26 Mei 2015 (Certificate Number ISPO 00007).				
	Others			-				
1.10	Time Bound Plan							
1.10.1	Time Bound Plan for Other Management Units.							
	Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status		
	MILL	Time Bound Plan						
	Brahma Binabakti	2015	Brahma Binabakti Estate	2015	District of Muaro Jambi, Province of Jambi, Indonesia	Certified		
			Brahma Binabakti Estate (Non HGU)	2023	District of Muaro Jambi, Province of Jambi, Indonesia	-		
		Plasma Pelayung (full managed scheme smallholder)	2019	District of Batang Hari, Province of Jambi, Indonesia	-			
1.10.2	Progress of Associated Smallholders and Outgrowers for Certifiable Standard							
	Based on document verification and interview with related stakeholder, obtained information that the company has had a partnership contract with KUD Akso Dano (Plasma 1 & 2) and KUD Dano Bangko (Plasma Pelayung) which is categorized as associated smallholder. Through the public consultation with board of smallholder (KUD) and FFB							

	<p>received data in mill obtained information that those associated smallholder supplied FFB to the mill consistently. However, until the ASA-3 assessment, CH can not show that those associated smallholder has been implemented RSPO standard so it raised as NCR 2018.6 RSPO Certification System Clause 4.2.3.</p>
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2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-3	<p>1. Andi Pratama Pasaribu (Lead Auditor Witnessed). Indonesian citizen. Bachelor degree, majoring social economy. He has several of work experiences (more than 5 years) as the operational staff since 2008. He has been followed the Training of Lead Auditor Indonesian Sustainable Palm Oil (ISPO) which was held by ISPO Commission in 2013 and Training of Lead Auditor Roundtable on Sustainable Palm Oil (RSPO) by Proforest and Daemeter in 2016. He has been attended several kinds of training, such as High Conservation Value (HCV) Training, Lead Auditor ISO 9001:2008, Lead Auditor ISO 14001:2005, auditor OHSAS etc. He has some experiences of ISPO audit in Indonesian palm oil in best management practices, land legality, environmental, social and SCCS aspect. During this audit, he verify land legality and social aspect.</p> <p>2. Trismadi Nurbayuto (Lead Auditor Witnessing). Indonesian Citizen. Diploma of Forest Management from Forestry Faculty; Associate Degree of Economic from Economic and Management. He has experienced as field assistant on oil palm plantation year of 2008. Therefore he has experienced as HCV and SEIA Assessor on 2010-2013. He has been followed HCV identification and management training; ISO training (9001;14001; 22000); ISPO Lead Auditor's training; Safety Expert; RSPO Lead Auditor's; OHS Auditors by Government Regulation No 50 year of 2012; and RSPO Next. He has been conducted audit on ISPO and RSPO scheme since year of 2013 as an Auditor on several aspect as environment, OHS, Legality, Best Management Practices, Social, Worker Welfare, Conflict Resolutions, Long term Business Plan and. During this audit, he verify aspect Supply Chain Certification System, worker welfare and social aspect.</p> <p>3. Brigitta Prita (Auditor). Citizen of Indonesia. Bachelor of Forestry, Department of Forest Resources Conservation and Ecotourism. She had attended Training ISPO by Commission ISPO on June 2013, Training ISO 9001:2008 Quality Management System on January 2014, In House Training 17021 and 17065 management system and Product Quality, Training High Conservation Value by IPB on September 2015, In House Training HCV on August 2016, In House Training Roundtable Sustainable Palm Oil on January 2014; In House Training ISO 14000:2004 Environmental Management System; Training Lead Auditor RSPO by Daemeter & Proforest. She has been audit experience ISPO & RSPO since April 2013 in the environmental, conservation, waste management and worker welfare aspects. During this audit, she verify environment, GHG and HCV.</p> <p>4. Yudhi Yuniarto Tallutondok (Auditor Trainee). Indonesian citizen, Bachelor of Fisheries, Padjadjaran University. Have experience of working over three years since 2013 as plantation operations staff in private palm oil plantation companies in Indonesia. Training have been followed including Indonesian Sustainable Palm Oil Auditor, Lead Auditor ISO 9001:2015, ISO 14001:2015, ISO 22000:2009, ISO 19011:2011, Basic Management Development Program Agronomy, Fire Anticipation on Land and Forest, Potential Mapping and Conflict Resolution in Production Forests, Awareness RSPO, ISO 17021 and ISO 17065. During this audit, he verify best practical management, OHS, Long term business plan and transparency.</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: 3 Auditors and 1 Auditor trainee. Number of days for ASA-3 at site: 5 days. Number of working days for ASA-3 at site: 20 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 Brahma Binabakti to the requirements of Indonesian National Interpretation of RSPO Principles and Criteria, July 2013 (endorsed by the RSPO Board of Governors meeting on 30th September 2016) and RSPO Supply Chain Certification Standard for Organizations Seeking or Holding Certification Adopted by The RSPO Board or Governors on November 21st 2014 Rev. 14 June 2017 (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) interview, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site.</p>

Opportunity 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. Improvement of findings from ASA-2 findings were observed by auditors at this 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

Brahma Binabakti Mill

- **Security gate.** Observation and interview with security officer regarding to FFB receiving procedure, emergency response, payments and complain mechanism.
- **Weight bridges.** Observation and interview with weight bridges operator regarding to supply chain procedure, FFB supplier code, separation of certified and noncertified product, including it calculation.
- **Loading ramp.** Observation and interview with sortation officer regarding to sortation procedures, record keeping and documentation.
- **All processing station (Sterilizer, Hoisting Crane, Thresher, Pressing, Digester, Clarifier).** Observation on FFB processing.
- **Boiler station.** Observation and interview related to OHS, health inspection and operator license. The company was provide all PPE's such as: helmet, mask, safety shoes, and gloves.
- **Engine room.** Observation and interviews related to the competence of workers, medical check up, and implementation OHS.
- **Workshop.** Observations and interviews with workers related to the management and implementation of health safety, and social worker and hazardous waste management.
- **Hydrant.** Auditor was observe emergency response, all pipe and nozzle on good conditions.
- **Housing of Mill.** Observation & interview with resident.
- **WWTP.** Observation related management of liquid waste.
- **Water Treatment Plant.** Observation related management of process and domestic water.
- **Hazardous waste temporary storage.** Observation and interview related management of hazardous waste.
- **EFB area.** Observation related management of EFB.
- **Chemical storage.** Observation and interview on environmental aspect, OHS implementation, management of chemical and understanding of working procedure.
- **Material storage.** Observation and interview related stock of PPE.

Brahma Binabakti Estate.

- **Boundary Poles no. 45, 47, 71 Block C10 Afdeling C, C15 and F7 Afdeling Afdeling G.** Observation of availability and maintenance of boundary poles.
- **Suak Putat Riparian zone at Blcok C11, Afdeling C.** Observe related to HCV Signboard, chemical application barrier. According to field observation, there are no indication of chemical application, the yellow paint was install at 5th oil palm.
- **Boundary Stones No. 71 & 72 at Block C10, Adeling C.** According to observation, the boundary stone on good conditions and maintained.
- **Boundary Stones No. 70 at Block C15, Afdeling G.** According to observation, the boundary stone on good conditions and maintained.
- **Boundary Stones No. 45 & 46 at Block F7, Afdeling G.** According to observation, the boundary stone on good conditions and maintained.
- **Mendahara Riparian zone at Block D15, Afdeling E.** Observe related to HCV Signboard, chemical application barrier. According to field observation, there are no indication of chemical application, the yellow paint was install at 5th oil palm.
- **Chemical Application at Block B1, Afdeling B.** Observation and interview related to safe Chemical application, OHS, first aid, labour, and welfare aspect.
- **Manuring at Block D10, Afdeling E.** Observation and interview related to safe Manuring, OHS, labour, first aid,

and welfare aspect.

- **EFB application at Block D8, Afdeling E.** Observation and interview related to safe working, OHS, labour, first aid, and welfare aspect.
- **Manual Circle**, Block C12 Division C, observation and interview related to safety work, OHS, labour, and welfare aspect.
- **Barn Owl Box**, Block C11 Division C, observation on nest condition and its monitoring.
- **Harvesting**, Block C6 Division C, observation and interview related to safe harvesting work, OHS, labour, and welfare aspect.
- **Circle and Path spraying**, Block B1 Division B, observation and interview related to safe spray work, OHS, labour, and welfare aspect.
- **Fertilizer**, Block D10 Division E, observation and interview related to safe spray work, OHS, labour, and welfare aspect.
- **EFB Application**, Block D8 Division E, observation and interview related to safe spray work, OHS, labour, and welfare aspect.
- **Barn Owl Box**, Block D6 Division E, observation on nest condition and its monitoring.
- **FFB transport**, Block D3 Division E, observations and interviews related to safe loading of FFB, OHS, labour, welfare aspect, and simulation of EBCC application in the FFB evacuation.
- **Chemical storage.** Observation and interview on environmental aspect, OHS implementation, management of chemical and understanding of working procedure.
- **PPE storage.** Observation and interview related stock of PPE.
- **Fertilizer storage.** Observation and interview related management of fertilizer.
- **Wash and spray equipment.** Observation related management of pesticide.
- **Fuel and Oil Storage.** Observation related management of fuel & oil.
- **Hazardous waste temporary storage.** Observation and interview related management of hazardous waste.
- **Workshop.** Observation and interview related activities in workshop.
- **Fire extinguisher.** Observation related fire extinguisher.
- **Policlinic.** Observation and interview related medical waste and others.
- **Housing of Afdeling C.** Observation & interview with resident.
- **Daycare.** Observation and interview with officer and activities in daycare.
- **Landfill.** Observation related management of domestic waste.
- **Land application Block E5 Afdeling F.** Observation related management of liquid waste.
- **Well Monitoring Block E5 Afdeling F.** Observation related management of liquid waste.
- **Water intake Block E7 Afdeling F.** Observation related management of water.

Stakeholder Visit:

- Government agencies of Muaro Jambi District (National Land Agency, Environment Agency, Labour Agency and Plantation Agency) on Monday 19 March 2018.
- Village Representatives of Bukit Baling and Suko Awın Jaya Village Tuesday 20th and Thursday 22nd 2018.
- Public consultation with board of member KUD Akso Dano Tuesday, 20th 2018.

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 Brahma Binabakti was held by :</p> <ol style="list-style-type: none"> 1. Public announcement on the MUTU website (www.mutucertification.com) on March 4th 2018. 2. Stakeholder consultations with NGOs have been conducted by sending questionnaires via email to several NGOs (Non Government Organization) on March 14th, 2018. 3. Public consultation meeting with internal stakeholders (worker union, committee gender and local communities) by interviews at March 21st, 2018. 4. Stakeholder consultations with government have been conducted by interview to several governments in Muaro

	Jambi District on March 19 th , 2018. Numbers of input from stakeholders were clarified by PT Brahma Binabakti.
2.3.2	Stakeholder contacted
	<i>Please find appendix 1</i>
2.4	Determining Next Assessment
	The next visit ASA-4 will be determined one year after this ASA-3 .

3.0. ASSESSMENT FINDINGS

3.1. Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Brahma Binabakti POM – PT Brahma Binabakti operation consisting of one (1) mill and one (1) oil palm estate.

During the assessment, there were one (1) were assigned against Major Compliance Indicators, four (4) nonconformities were assigned against Minor Compliance Indicators, one (1) nonconformities against supply chain requirement for CPO mill and three (3) opportunities for improvement were identified.

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

MUTUAGUNG LESTARI found that of Brahma Binabakti Mill – PT Brahma Binabakti, complied with the requirements of **Indonesian National Interpretation of RSPO Principles and Criteria 2013 by INA-NITF, July 2016 (Endorsed by the RSPO Board of Governors meeting on 30th September 2016) and RSPO Supply Chain Certification Standard for organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014 revised on 14 June 2017 (Module E for CPO Mill).**

Therefore MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is **Continued**.

Ref Std.	VERIFICATION RESULT of MUTU-Certification
PRINCIPLE #1 COMMITMENT TO TRANSPARENCY	
1.1 Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	
Major 1.1.1.	
The Company has list of stakeholders and it updated every half of year. There are also list of information can be accessed by the stakeholders as: Land Use Title, EIA, etc. Information request and respond procedure was signed by management with number SOP/SUPP/V/2017/004 (Rev. 03) dated 8 May 2013. It has socialized to external stakeholders from 28 December 2017 till 6 January 2018. However the company to be consider to send reports to the relevant agency with the specified time limit (OFI) .	
Major 1.1.2.	
The company has set up a hierarchy of officers who provide information replies to relevant stakeholders with Procedure Number SOP/SUPP/III/2017/001 dated February 20, 2017. Officers who provide information starting from the level of Assistant, Head of Administration, to the highest level of the Board of Directors in the head office. The approved grant period is provided within a maximum of 5 business days. For the type of information that is not approved will be given the answer within a maximum of 2 working days. In point 4.8.4 states every incoming letter requires a response no later than 14 working days. All requests for information are listed in the company logbook containing the accepted date and the date of the response to the request. The company also has records of reporting to the relevant agency, for example: quarterly 4 th , 2017 OHS Committee report to the Jambi Province of Man Power Agency dated 15 January 2018.	
Major 1.1.1	Status: Opportunity For Improvement (OFI).

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.	
Major 1.2.	
<p>The company has the procedure (SOP No. 106 181 / TAP / PRO-CSR-HO / VI/13) that the content has been completed as required under RSPO standards for public accessed such as the concession, Complaints & Grievance Procedure, Negotiation Procedure, Continues improvement, Public Summary of the Certification audit report, and Human Rights Policy. The Company has been disseminated type of relevant information and can be accessed by all relevant parties to the stakeholders.</p>	
	Status: Comply
1.3	
Growers and millers commit to ethical conduct in all business operations and transactions.	
Minor 1.3.	
<p>The Company already has a Business Ethics Policy. Policy are listed on the instruction no. 004 / K-DIR / II / 2013 date February, 22 2013. In each work agreement, MoU with contractors has been stated a prohibition of all forms of corruption, bribery and fraudulent. Based on interview result with FFB Suppliers and several workers in Estate and Mill, they have understood of this policy and commit to ethical conduct and integrity in their operation and transaction.</p>	
	Status: Comply
PRINCIPLE #2 COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS	
2.1	
There is compliance with all applicable local, national and ratified international laws and regulations.	
2.1.1 Major, 2.1.2 Minor, 2.1.3. Minor and 2.1.4 minor.	
<p>The company has list of government regulations which adopted for oil palm plantation activities. The list has updated annually by Corporate Legal Staff. During audit, the most updated list was from March 2018, which consist of 47 items manpower regulations, 49 items of environment and conservation regulation, 51 items of OSH regulations, 23 items of legal and permit regulations and 29 items of best management practices regulations.</p>	
Land Right and Legality	
<p>The company has showed several document regarding to their land legality as follows:</p> <ol style="list-style-type: none"> 1. Land Use Title, Certificate No. 2 and 3 dated December 1996 for palm oil estate. 2. Land Use Title, Certificate No. 77 until 108 dated April 2014 palm oil estate. 3. Land Use Building, Certificate No. 2 dated on October 2000 for palm oil mill. 4. Plantation business permit, based on Muaro Jambi's One Stop Services Permit Head Decree dated on November 20th 2013. 5. Plantation business permit, based on Muaro Jambi's District Head Decree dated on June 18th 2012 (associated smallholder). 6. Plantation business permit, based on Muaro Jambi's District Head Decree dated on April 20th 2012 (associated smallholder). 7. Plantation business permit, based on Batang Hari's District Head Decree dated on September 2nd 2013 (scheme smallholder). 	
	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.	
2.2.1	
<p>PT. Brahma Binabakti operated a mill (Brahma Binabakti Mill) which supplied by Brahma Binabakti Estate, 2 associated smallholder (Plasma 1 & 2), one scheme-smallholder (Plasma Pemayang) and some independent outgrower and</p>	

independen supplier. Whole operational area of Brahma Binabakti Estate and mill has been covered by land legality according to the national regulation. Those land legality as follows:

1. Land Use Title, Certificate No. 2 and 3 dated December 1996 for palm oil estate.
2. Land Use Title, Certificate No. 77 until 108 dated April 2014 palm oil estate.

Total Land Use Title: **7,227.358 Ha.**

According to the latest hectare statement that showed by management representative, PT. Brahma Binabakti operating area **7,227.09 Ha.** There is a discrepancy 0,27 Ha which is noted as measurement error due to differences of measurement technic.

PT. Brahma Binabakti has an agreement with two (2) associated smallholder named KUD Akso Dano located in District of Muaro Jambi and KUD Dano Bangko located in District of Batang Hari with contract scheme 70:30. Means every land handover from land owner (villagers), the company will achieve 30% of land after land building has finished. Through the 30% of those land, there are stated as Production Forest status. The company has shown the progress of land use title achievement until the audit.

2.2.2

The Company has had SOP of pole maintenance (No. 027/MI-DIR/XII/2012) which described that boundary poles installation should be reported monthly. All boundary poles has been mapped by Surveyor Department. According to boundary poles installation document, there is 85 poles located in whole HGU area. for example:

- Boundary poles BPN BBB No. 45



Boundary Poles No. BPN BBB No. 45

- Boundary poles Number. BPN BBB No. 46



Boundary Poles No. BPN BBB No. 46

Based on field visit and legal boundary observation in Block C10 Afdeling C, C15 and F7 Afdeling Afdeling G found that boundary poles located in the middle of planting area that stated as Production Forest/Conversion Production Forest. However, there is insufficient evidence that the company already has a convincing and well-implemented mechanism for separating certified and non-certified products. **Non Conformity No. 2018.1.**

2.2.3

The company has had procedure of land acquisition (SOP No: 002/TAP/PRO-CSP-HO/IV/10 dated 11 February 2013). Those procedure should be started with planning and socialization that involving estate staff and villager representatives. Land survey and measurement of land should be involving land user in order to verify land ownership, handover estimation cost and land compensation process. Based on public consultation result with village representative of Bukit Baling and Suko Awin Jaya Village on March 20th and 21st 2018 is known that there is no land dispute or claim since 2015.

2.2.4 & 2.2.5

During the ASA-3, there is no land compensation that on process. Whole previous land compensation documents are maintained in the Legal and CSR Department (site office and in Jakarta Head Office). According to the result of stakeholder consultation by conducting field visit to the village representatives of Bukit Baling and Suko Awin Jaya Village, there is no land dispute or issue between the locals and the company.

2.2.6

The company has had procedure complaints mechanism from stakeholder (No: 106899 / TAP / PRO-CSR-HO / VI / 13) which stated in clause 4.3.3 that every complaint handling shall be fair and avoiding intimidation directly or indirectly. Based on public consultation result with village representative of Bukit Baling and Suko Awin Jaya Village on March 20th and 21st 2018 is there is no intimidation or paramilitary approach during the land acquisition process. Land-user has free to reject any land acquisition proposal.

Minor 2.2.2.	Status: Status: Non Conformity No. 2018.1 indicator Minor.	
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2.3
Use of the land for oil palm does not diminish the legal rights, or customary rights, of other users, without their free, prior and informed consent.

2.3.1; 2.3.2; 2.3.3; 2.3.4

The company has had procedure of land acquisition (SOP No: 002/TAP/PRO-CSP-HO/IV/10 dated 11 February 2013). Those procedure should be started with planning and socialization that involving estate staff and villager representatives. Land survey and measurement of land should be involving land user in order to verify land ownership, handover estimation cost and land compensation process. Based on public consultation result with village representative of Bukit Baling and Suko Awın Jaya Village on March 20th and 21st 2018 is known that there is no land dispute or claim since 2015. Land acquisition process should be carried out together with the sub-district and village as well as the compensation price must be negotiated together with land owners.

Since the previous assessment (ASA-2) until this assessment, the company did not conduct acquisition for new land or expand area.

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.

Major 3.1.1 and Minor 3.1.2

The company already has documents related to the Long Term Plan for the period 2018 - 2022 covering operational cost, CPO price, production, CPO quality, selling price, and replanting plan. The results of the Long Term Plan (RJP) study of 2018 - 2022, known that the company has prepared a replanting plan that is in 2018 of 1,006 Ha, 2019 of 1,113 Ha, 2020 of 896 Ha and 2021 of 582 Ha.

The result of interview with the management known that the company routinely evaluates each month. It is further explained that management has appointed Senior Estate Manager to conduct monthly evaluation related to Long Term Plan and realization.

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.

Major 4.1.1

The company has documents related to procedures for oil palm cultivation and palm oil processing listed in Agronomic Technical Guidelines (starting from planting up to transportation of FFB) and Factory Technical Guidelines (starting from FFB acceptance up to processing FFB). The results of interviews with the management known that each field operational staff (estate assistant and factory assistant) has a bundle of procedures as a reference in conducting field work. procedures are also available in estate office / factory office.

Field observation results and interviews with employees at Brahma Binabakti Mill in grading station found that workers can explain their duties and responsibilities, employees can also explain the criteria of ripe fruit and provide good grading example. Employees are also known to have received socialization related to the Code of Integrity and Ethical Code Policy and have understood the purpose and objectives.

Minor 4.1.2 and Minor 4.1.3

The company has an Internal Audit Procedure (Describes the working procedures that form the basis for plant and plant operations activities that refer to the principles of SPO.) The company is known to regularly conduct internal audits once a year conducted by the Company's Internal Auditor to conduct an audit related to the operation of a management unit (estates and factories) . The company shows the results of internal audit of 2017 conducted on October 2017 by 3 internal audit firms The following sample results are found at the time of the audit activity:

- The first aid box carried by the foreman is incomplete, usage monitoring is not updated, and the manual book is missing. The company in this case made improvements by completing the item of first aid box, and control the monitoring updates. EHS assistant and field assistant as the PIC.

- PPE (helmet) for 4 harvesters and pail for 10 harvesters not provided. The company in this case complements the PPE and employee work equipment. Field assistant and warehouse staff as the PIC.
- Fire Extinguishing monitoring not update and there's no Fire Extinguishing at generator station. The company in this case make improvements by updating the monitoring of Fire Extinguishing periodically and complete the Fire Extinguishing in the generator station. EHS assistant and field assistant as the PIC.
- PPE (glasses) for the pesticide applicators is broken and has not been replaced. The company in this case filed PPE replacement and conducted daily monitoring. EHS assistant and field assistant as the PIC.

The results of interviews with the management is known that up to the audit activities carried out the management has made improvements to the findings of internal audit.

Major 4.1.4.

The company has procedure FFB Purchasing number SOP/SUPP/II/2016 001 dated 29 January 2016. The Purchasing Assistant will register all suppliers and survey them, before the MoU signed by both of parties. Based on FFB Received report on February 2018, there are nine independent FFB suppliers, Plasma 1, Plasma 2, Plasma Pemayang and own estate. The MoU was informed about total area, FFB production estimation and land legality status.

Status: Comply

4.2

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

Major 4.2.1 and Minor 4.2.2

The company is known to have a procedure related to the management of planting fertility listed in the Agronomic Technical Guidelines on Fertilization. This procedure discusses about manual fertilizing (PT/EST/VII/2016/024), organic fertilizing with POME (026/PT/VIII/2014), fertilizing application in breeding (039/PT/XII/2014), mechanization of fertilizing (025/PT/II/2014), fertilizer sample test (PT/EST/X/2015/031), soil sampling unit (069/PT/VIII/2014), leaf sampling unit (050/PT/VIII/2014), and deficiency indication on plant (052/PT/IX/2014). At the time of the audit activity the company shows documents related to the fertilization program of 2017. The document describes fertilizer progress and fertilizer use per ton of FFB. The result of interview with the management known that the company has implemented the fertilization program in 2017 well according to the recommendation on the analysis of leaf and soil.

Minor 4.2.3

The company has procedures for leaf analysis (050/PT/VIII/2014) and soil (069/PT/VIII/2014). Leaf and soil sampling is conducted by PT Hijau Persada Sejahtera - Chemical Analytic of Laboratory . At the time of the audit activity, the company can show the procedures to the auditor and can explain it well.

The sampling of soil for Brahma Binabakti Estate was conducted on June 22, 2017. The number of samples sent respectively was 32 samples while the sampling of leaves was conducted on June 10, 2017 with 92 of total samples. Leaf sampling based on representation of cropping years and soil type in 1 division. Leaf sampling is only done 10% of the 1 block sample area.

The results of interviews with Research Staff found that soil and leaf analysis results were used as the basis for determining fertilizer recommendations. In this case the company may show a sample of temporary fertilizer recommendations for estate.

Minor 4.2.4

The company is known to have a nutrient recycling strategy such as the utilization of pruning, the application of POME, and the utilization of empty fruit bunch (EFB).

The company utilize the EFB to help with minimal soil nutrient enrichment. EFB application is executed every month at a dose of 300 kgs/staple or 40 tons/hectares. At the time of the audit activity, the company may show the recording of the EFB application for the second semester of 2017.

The company has a license to utilize the palm oil industry's waste in oil palm plantations based on the decision of District Muaro Jambi No. 07/Kep.Ka.BPTSP/VI/2016. The company can irrigate the land with an area of 300 ha located. The result of field visit in Block E5 Afdeling E its known that the company is utilizing the liquid waste from the palm oil mill. The results of interviews with LA bed workers, known that employees do maintenance by reopening the blocked flow path and elevate the embankment for every bed LA to prevent runoff.

Status: Comply

4.3

Practices minimize and control erosion and degradation of soils.

Major 4.3.1

The company has a Detailed Soil Map with a map projection geographic (Lat/Lon), Spheroid: World Geodetic System 1984, planar unit: Arc Degrees, sumber SRTM 90m DEM 2010. Made on September 5, 2014. The map contains information on: soil classification, texture, depth, drainage, limiting factor, rocks and conformity information for oil palm plantation development, ie map and land classification Brahma Binabakti Estate presented on a scale of 1: 140,000. The map is equipped with a Table of Soil Characteristics and Land Suitability Assessment of Palm Crop Land.

Based on the document review (land map) it can be seen that the land suitability class cultivated by the company is S2 (Fairly Sufficient) 3,647.95 Ha or about 83.80% and S3 (Appropriate / Marginal) 704.14 Ha or about 16.2%. The average drainage is quite good with the limiting factor is topography / relief.

Minor 4.3.2

The company has a management strategy in the area with a slope of 15-25%. Are as follows conducting individual terrace and conducting Vertiver grass plant. Based on the document verification of Slope Map document, known that the slope in the operational area of the company consists of 0 - 8% which is categorized as flat, 8 - 15% which is categorized as slope slightly, and 15 - 25% are categorized rather steep. There are no areal with the slopes > 40%. This has been verified based on the results of field visits. Based on filed observation in D8 Block Division E known that the company has implemented individual terrace. In addition, for steep areas Vertiver grass has been planted to minimize the impact of erosion.

Minor 4.3.3

The company represents a 2018 Budget document that one of the points in it describes in relation to a road improvement plan that includes re-road hardening, hardening road and mechanical / manual road repairs.

Based on the document verification of road hardening progress of 2017, known that the company conducts a 17,773 meter road sweep from 21.395 meter budget or about 83.07% achievement. The results of interviews with the management known that the road hardening does not reach 100% because there is high rainfall in several months.

Major 4.3.4 and Minor 4.3.5

Based on the document verification of detail soil map with scale 1: 140.000 with map projection geographic (Lat / Lon), Spheroid: World Geodetic System 1984, planar unit: Arc Degrees, SRTM 90m DEM source 2010. Created on September 5, 2014 note that there is no peatland within the operational area of the company.

Minor 4.3.6

Based on the results of soil analysis, known that there is sandy clay texture and land suitability level is S3 with an area of 704.14 Ha, strategies that undertaken by the company include fertilizing in accordance with recommended doses and utilize EFB at a dose of 300 kgs/staple or 40 ton/hectares.

Based on field observations and interviews with employees of EFB application in Block D8 Afdeling D, known that employees have understood how to applicate the EFB that is between the trees with a dose of 40 ton/ha or 300 Kg/ stapel.

Status: Comply

4.4

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

Minor 4.4.1.

The company has water management plan from POM and Estate which presented in EIA (RKL/RPL) Report 2nd Semester 2017. The plan has covers surface and ground water quality testing, biota, water used efficiency, etc. based on RKL/PRL review, it could be concluded that all parameter tested were bellows threshold as required by regulation of health minister number 492 year 2010.

Major 4.4.2.

The company has HCV map with scale 1:40,000 which informs location of riparian zone within PT BBB. Furthermore, based on observation to riparian zone of Suak River in Afdeling C Block C11 and riparian of Anak Mendahara River in Afdeling E Block D15, it was known that HCV management program has satisfactory implemented on the field such as installation of signboard and marking of prohibited zone for agrochemicals application which presented through red paint marks on the palm.

Minor 4.4.3.

Waste water or mill effluent from oil palm processing was treated on the WWTP station, before flows into the permitted flatbed as land application. Mill management has conducted monthly water quality testing on WWTP outlet which carried out by Environment Agency of Jambi Province (KAN LP-143-IDN). Based on testing results on September 2017 to February 2018, it was informed that all parameter tested were bellows threshold limit as required by Minister of Environment Regulation No. 29/2003. For land application, the company has permit which presented in Decree of *Badan Satu Pintu terpadu* (Investment Board of Jambi Province) No. 07/Kep.Ka.BPTSP/VI/2016 dated June 23rd 2016, for area covers 300 ha. The permit is valid for five years (June 23rd 2021). Based field visit in Block E5 Afdeling E Its known that the company is utilizing the liquid waste from the palm oil mill. The results of interviews with LA bed workers, known that workers do maintenance by reopening the blocked flow path and elevate the embankment for every bed LA to prevent runoff.

Minor 4.4.4.

Permit of surface water consumption is presented in Decree of Minister of General Works and National Housing No. 238/KPTS/M/2016. Based on Average of water consumption data from January to December 2017, it was informed that water consumption for oil palm processing and domestic purposes were 1.42 and 0.13 m³/ton FFB, respectively. This processing figure was still bellows its target which was 1.50 m³/ton FFB. Based on interview from mill management, it was informed that water retribution tas has paid avery month as for example presented in receipt from Finance Agency of Jambi Province dated February 21st 2018.

Status: Comply

4.5

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

Major 4.5.1

The company has an integrated pest monitoring and control program listed in the budget year 2018. This budget is in accordance with the procedures listed in the integrated pest control procedures, for leaf eater caterpillar census done once a month, horn beetles are done every two weeks, rat pest is done once a month and monitor the owl nest done once a month.

Based on interviews with research staff, part of the other IPM plan is not spraying soft ferns, as soft ferns are a habitat for leaf eater caterpillar predators, in addition to saving pesticide use. The application of biological control agents such as owls and beneficial plants is also part of reducing pesticide use. Based on the rat census document and leaf eater caterpillar document review for 2017, known that no pest attacks were found that crossed the economic threshold. So there is no use of pesticides for the control of pests and diseases of oil palm.

The results of field visit in Blok C11 Division C note that the condition of barn owl box in active state, there are the former vomit and fur that fall out.

Minor 4.5.2

Company shows employee training documents related to pest control as follows:

- Training of LSU and SSU on May 2, 2017 located in Block A8 Afdeling A. Aidil Syahputra as the speaker. Number of participants 14 people. Documentation, training materials and attendance lists are available.
- Training on pest control on January 30, 2018 located at shchedule waste. Aidil Syahputra as the speaker. Number of participants 18 people. Documentation, training materials and attendance lists are available.
- Socialization of MSDS on November 27 – 30, 2017 located in Block C12, Block A04, Block B05 and Block G05. Number of participants 51 people. Documentation, training materials and attendance lists are available.

Based on field observation and interview with foreman and 3 workers in Block C12 Divisi C known that employees have an understanding of integrated pest management. Employees can explain the benefits of substitute *Turnera subulata*, *Casia cobanensis* and *Antigonon leptosus*. Employees have also understood the benefits of using owls in controlling rat.

Status: Comply

4.6

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

Major 4.6.1 and Major 4.6.2

The company has guidance on the use of pesticides listed in the following documents:

- MSDS (Material Safety Data Sheet) for each type of agrochemical material (Pesticide) which describes material storage and handling instructions, handling in case of accident (first aid effort), Hazards identification, action on spills and leaks, personal protective equipment, physical properties and chemistry, reactivity and stability, toxicological information, ecological information, waste disposal and transport.
- Procedure of Technical Guidance of Spray with number 014 / PT / V2014. In the procedure there are some guidelines that are how to select, store, use, overcome contamination, understand signs and symptoms of pesticide poisoning, first aid instructions and guidelines for medical treatment of poisoning. In addition, it is explained in sufficient detail about the instructions for the use of parakuat herbicides.

At the time of the audit activity, the company may show documents relating to the pesticide toxicity record (LD50) for each management unit. In the document documented product name used, active ingredient, LD50, percentage of active ingredient, total application, total active ingredient, production FFB and pesticide unit / kg, hectare application and pesticide unit / Ha.

The results of interviews with research staff found that the company attempted to replace the pesticides used periodically to avoid the emergence of resistance

Major 4.6.3

Based on document verification of Census Recap of the Pest in 2017 revealed that there were no attacks for any significant pests. The results of interviews with the management is known that within 1 year there is no use of pesticides for pest control so it can be concluded there is no prophylactic use of pesticides.

Minor 4.6.4

The company presented Internal Memo with the number 001/TAP/MIN-EST-HO/II/13 dated February 22, 2013 on the termination of Paraquat's herbicide reservation. The memo was issued by Estate Division Head to all CEO Region, all GM, SEM, and EM. The memo is valid from February 22, 2013. At the time of the audit activity, the company can show the documents related to the use of pesticides type paraquat period of 2012 - 2014, from the data known that there is a downward trend of paraquat use from year to year (2012 - 2014) and since 2015 the company no longer use paraquat, this is in accordance with Internal Memo 001/TAP/MIN-EST-HO/II/13.

Based on field observations at Brahma Binabakti Estate's chemical warehouse, the available stock of pesticides is in accordance with the material stock documents. There are no paraquat or other pesticides included in WHO 1A and 1B.

Major 4.6.5

At the time of the audit activity, the company may present documents related to the realization of employee training in 2017 and the employee training program 2018 which includes a program on the use and handling of pesticides while working.

The result of field observation and interview with pesticide applicator in Block B1 of Division B known that pesticide applicator have been given training of safe use of pesticide, pesticide applicator can explain action done if during work

poisoning, pesticide applicator also explained that routine health checks are conducted every 6 months and pesticide applicators have been trained in the use of good and proper PPE so they have realized the importance of maintaining health in their work.

Field observation results in the Brahma Binabakti Chemicals Warehouse known that MSDS (Material Safety Data Sheet) is available for each pesticide used. The chemical warehouse officer can explain well in terms of MSDS and its usefulness.

The auditor conducted an interview with a pesticide applicator related to the PPE replacement procedure. From the interviews known that pesticide applicators have a good understanding of the procedure of PPE replacement, for example if the glove is damaged then the applicator pesticide report to the foreman accompanied by the handover of damaged gloves, then the foreman made a report on the replacement of PPE to the assistant division. The division's assistant will approve the replacement of the PPE if it has received the defective item. The process of replacing PPE is 2 days long.

Major 4.6.6 and Minor 4.6.10

The company has documents relating to pesticide storage in TAP/SOP/120-SHE/0001 on hazardous and toxic materials waste management. In the procedure describes the terms of storage, technical building storage, storage procedures, disposal and reporting.

The company shows evidence that any pesticide packaging has been stored and not used for other purposes such as monitoring the exit gallon of ex-pesticide packaging in 2017. In the document described the number of gallons of pesticides coming out of the central warehouse and the entry (after application of the spaciousness) to the schedule waste.

Based on field visit in chemical storage, known that all chemicals has been separated from other materials, labels and symbols has been installed properly as well as Material Safety Data Sheet (MSDS) and others.

The result of field observation in employee lodges, there is no indication of the use of agrochemical ex-packing for other purposes

Minor 4.6.7

The application of pesticides in the field has been through proven methods to minimize the risks and negative impacts as documented in IK-12/BBBS/2018 on General Guidelines on Security in Working with Pesticides, including safe guidance in selecting pesticides, storing pesticides, and using pesticides for example: the selected pesticide formula must be in accordance with the intruder's remains because a pesticide formula will only be effective against one particular type of pest.

At the time of the audit activity, the company may present documents related to the realization of employee training in 2017 and the employee training program 2018 which includes a program on the use and handling of pesticides while working.

Based on field observation in Brahma Binabakti Estate known that certificate holders have a special place for PPE storage, work tools and bathing after spraying. Pesticide solutions are mixed in chemical storage and transported by special vehicles. The same thing is expressed when the auditor conducted an interview with pesticide applicators in the field. Employees can explain well the procedure before spraying up to go home.

Field observations and interviews with pesticide applicators in Block B1 Division B known that pesticide applicators have been given training on safe use of pesticides, pesticide applicators can explain the actions taken if during work poisoning, pesticide applicators also explained that routine health checks are conducted every 6 months and pesticide applicators have received training related to the use of good and true PPE so that it has realized the importance of maintaining health in work

Major 4.6.8

Results of interviews with management and community leaders around, it is known that the holder of the certificate does not do the application of pesticides by air.

Minor 4.6.9.

The company provides training to its employees regularly related to the use and handling of pesticides in accordance with the technical guidelines and how to work safely. The Company does not provide training to tenants because currently in the area of the company there are no scheme smallholders. Examples of training provided to employees about pesticides handling and first aid training in central warehouse on September 19, 2017. Based on the results of field observations and interview in Block B1 Division B on chemical weeding's stated that they did not follow training of using limited pesticides because the company is no longer using limited pesticides such as paraquat, but the pesticide applicator admitted that they have followed spraying technical training held by the company.

Major 4.6.11.

According to documents verification and interviews with sprayers known that the company has conducted periodic medical surveillance and the latest was held on October 27, 2017 at estate office by Prodia Laboratorium. Based on document verification and information from company doctors that known the several workers healthy and fit to work.

Major 4.6.12.

The company has procedure No. IK-12/BBBS/2018 about Spraying and IK-17/BBBS/2018 about fertilizer; on this procedure has stated "The company doesn't permit a pregnant and a breastfeeding women's working on activities related to chemicals handling". This procedure has been socialized to pesticide applicators dated February 1, 2018. The latest list of women pesticide applicators in Brahma Binabakti Estate: 75 workers. The company has mechanism to identification of pregnancy by a midwife every month in policlinic.

Status: Comply

Comply

4.7

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

Major 4.7.1

The company is consistently documenting the policy of OHS program and its implementation is conducted in mill and estate management unit based on the program of Environment OHS of PT Brahma Binabakti for period of 2017. The company conducted Socialization of OHS Policy, OHS Program, Training of OHS Foundation and HIRAC on January 12, 2017 at BBB meeting room. Irena Ginting as speaker. Number of participants 20 people. Documentation, training materials and attendance lists are available.

Major 4.7.2.

According to document verification and field observation known that the company has made the identification and assessment of risks to operational activities in the estate and mill. Records of the assessment results are set forth in the document of Hazard Identification Risk Assessment and Control (HIRAC) which was reviewed regularly once a year or as needed. The HIRAC document is informing about the type of activity, type of work (routine, non-routine and emergency), source / occurrence, impact, existing controls, the level of probability, severity and risk level.

Major 4.7.3.

Based on field observation and interviews with workers known that employees have received training on the improvement and employee understanding about OHS aspects. For example training for a electric technician on Brahma Binabakti Factory, it has been conducted on March 11, 2017 to all power plant operators. This is evidenced when the employee can demonstrated the work steps rightly and properly in accordance with the procedures or work instructions.

The Company represents Letter No. Ket04 / Nakertrans-3.1 / 2017 issued by the labor and transmigration agency of Jambi Province on December 1, 2017 concerning the process of extending the operator's license in the Director General of the Supervision of Labor Inspection and OSH, Ministry of Manpower of the Republic of Indonesia. So in this case the company had the opportunity to monitor the renewal process for the license of several operators. **OFI**

The company has a document of protective personal protective equipment (PPE) procedures with the number PT/SUPP/VI/2017/019 authorized by Group CEO on June 2, 2017. In the procedure describes the type of PPE for each job (estates and factory) along with its replacement system. Based on field observations and interviews with pesticide applicator in Block B1 Afdeling B, known that if the PPE is damaged, employees may apply for replacement by giving damaged PPE to the foreman and the supervisor will check and apply to Assistant to provide new PPE for workers.

Major 4.7.4.

The responsible person in the OHS program has also been identified. The management unit has had the organization container in Guiding Committee of Occupational Safety & Health (P2K3) which is responsible for OHS program. Results of the verification document known that the management unit has submitted the Guiding Committee of Occupational Safety & Health reports regularly every three months. The Guiding Committee of Occupational Safety & Health report covers all activities of OHS, among others: Guiding Committee of Occupational Safety & Health recommendations, the results of the investigation of workplace accidents, work accidents recapitulation, Guiding Committee of Occupational Safety & Health activity reports, employee health inspection reports, minutes of meetings held every months. Based on interview and document verification that known each unit has a certified secretary of P2K3 according to Manpower Minister Decree No. KEP.3936/NAKER-BINWASK3/VI/2016 (Estate and Mill).

Minor 4.7.5.

The Company has procedures in case of emergencies, such as SOP of Emergencies, and SOP of Fire Prevention and SOP of Fire Fighting. In addition, to facilitate the evacuation in case of emergency, the company has established an evacuation route which also equipped with a map and other markers and an adequate sign board. The results of the field visit was also known that the supervisor of the harvest has been equipped with First Aid box, it is also found the First Aid box in the mill office, some of them are in stations and workshops. Based on the interview with the supervisor known that the supervisor had understood about first aid in case of occupational accidents in the field. He was explaining related to work accident record and its review by OHS guiding Committee. However, simulation results of fire emergency response in factory area (engine room station and press station) with hydrant known that the hose is in leak condition. The company in this case has not been able to show an effective monitoring system so that it becomes **Non-Conformity No. 2018.02 with minor category**

However, based on the results of field observations on operational activities, the auditor passed the verification related to First Aid Box and found the fact that:

- Manual Circle in Block C12 Afdeling C, found flashlight not working, monitoring usage has not been updated. The results of monitoring in February 2018 show condition of first aid box and complete item.
- Circle Path spray in Block B1 Afdeling B, found exposed eye washers and alcohol solutions have expired, rusty pin, flashlight not working, and monitoring the use has not been updated. The results of monitoring in February 2018 show condition of first aid box and complete item.
- Fertilizer in Block D10 Afdeling E, found one of the items has expired, and monitoring of usage has not been updated yet. Monitoring results In February 2018 showed the condition of first aid boxes and complete items.
- Warehouse, there is an addition item that is ointment burns and already expired in December 2017. But the CH can not show the basic of addition of the item in writing by a competent officer.
- Guest house, found expired eyewash solution, safety pins and flashlight does not exist. The results of monitoring in February 2018 show condition of first aid box and complete item.

Based on the above, known that the company has not been able to ensure the first aid box in the field has met the requirements so that it becomes **Non Conformity No 2018.02 with minor category**.

Minor 4.7.6.

PT Brahma Binabakti provides work accident insurance for its personnel, which is registered in manpower-social insurance (*BPJS Ketenagakerjaan*). Based on observation over the monthly membership cost and number of membership, known that the entire personnel within PT Brahma Binabakti has been registered in manpower-social insurance (*BPJS Ketenagakerjaan*) and company has periodically pay the membership cost every month based on the applicable regulation. The company also was register all workers on health insurance programs (*BPJS Kesehatan*), for examples: proof of social and health insurance payments for all workers on January 2018 has been paid dated February 6, 2018.

Work Accident Report to Manpower Social Insurance (BPJS Ketenagakerjaan) on December 20, 2017. Victims of occupational accidents on behalf of Sukardinata age 51 years, work as first foreman in Division H. Accident occurred on December 19, 2017 causing permanent disability (amputation of 2 index finger of right hand). Reports using form 3 KK 1, form 3a KK 2, and 3b KK form 3. Available some attachment documents for example: summary of home patient care, x-ray examination, routine blood examination, birth certificate, victim family card, photocopy of membership card BPJS

Employment, copy of identity, and copy of passbook.

Minor 4.7.7.

The company has consistently monitoring the Accidents which are fully informed about: months of the incident, the number of cases, the location of the accident, type of accident, as a result, work hours lost, causes, follow-up and results. Monitoring of work accidents are performed every month and reported to the related government agency with regular reports of Guiding Committee of Occupational Safety & Health together. Based on monitoring result that known **Mill:** - case; **and Estate:** 1 case, 0.62 FR and 124.13 SR.

Major 4.7.3.	Status: OFI.	
Minor 4.7.5.	Non-conformity with Minor category Number 2018.02.	

4.8

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

Major 4.8.1 and Minor 4.8.2.

The company has list of training programs 2018 period such as fertilizer training on September, Spraying training on February, April and May, Harvesting training and transportation on April, Integrated pest management on May, OHS training on January, February, March, April, May, June, August, October, and December, SCCS Training on June, Hazardous waste training on December and others.

Beside that, there are realization of trainings on 2017 period such as: Handling of hazardous waste training on December ; 12, 2017; SCCS training on March 16, 2018; HCV and protecting wildlife on August 15, 2017; Fertilizer training and PPE on February 23, 2018; Maintenance of riparian area socialization on November 27, 2017; MSDS training on 27 November 2017 and others.

Based on explanation above, the company have given worker trainings in accordance with their respective work. Based on interview with some pesticide applicator in Block B1 Division 1 obtained information that they has been trained regarding to pesticide handling. They also demonstrate safe working procedure during the interview.

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.

Major 5.1.1.

The company has a EIA in accordance with decree of Environmental Agency District of Muaro Jmabi number 11 year 2010 for activities of palm oil plantation (inti & Plasma) and mill covers ± 10.500 ha located in Subdistrict of Sekerman District of Muaro Jambi and endorsement by Head of office Environmental Agency dated on December 27. 2010. Processing Capacity is 60 tonnes FFB/hour. There is matrix revision recommendation of Environment Monitoring Plan (RKL) EIA for plantation and processing Mill of Palm oil with number decree 660.4/095/BLH.3/II/2016 dated on February 23, 2016 by Environmental Agency.

Minor 5.1.2 & 5.1.3.

Implementation of environmental management and monitoring has accordance with EIA document such as:

Estate.

- Testing of emission and ambient every 2 times each year.
- Testing of noise every 2 times each year.
- Testing of quality of water surface every 2 times each year.
- Testing of quality of under ground water every 1 time each year.
- Community development programs every each year.

- Household economy to communities every each year.

Mill

- Testing of emission air and noise every 2 times each year.
- Testing of liquid water every 1 month.
- Testing of aquatic air ever 1 year.
- Employment and business opportunities.
- Corporate Social Responsibilities.

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

Major 5.2.1.

The company has a report identification HCV PT BBB was conducted on 7-12 May 2013 by Ahmad Faisal Siregar S.Hut. MSi (HCV Consultant). Based on identification area HCV is 30.66 Ha such as Anak Mendahara River (16.77 Ha) and Suak Putat River (13.89 Ha). The methodology based on guidance identification HCV Indonesia Verision II June 2008. Consultation process was involved local communities (Suko Awin Jaya Villages, Bukit Balin Villages, Suak Putat Villages and Tanjung Lanjut Villages. Peer review by Dr. Ir. Nyoto Santoso on May 2013.

Based on last audit findings regarding to riparian area, the company has re-measurement of their riparian area which is concluded that the company added perimeter of HCV in riparian area. It increasing HCV area in riparian area amount 2.12 Ha.

Based on monitoring fauna 2017 in PT BBB, the type of wildlife aren't RTE Species but Least concern and Near Treated. Such as: Phython (NT), *Felis bengalensis* (CITES APP II), *Macaca fascicularis* (CITES APP II), Scandentia, *Sus crofa*, *Varanus salvator* (LC), *Elanus caeruleus*, *Alcedo meninting*, and others.

During field visit to riparian zone of Suak River in Afdeling C Block C11 and riparian of Anak Mendahara River in Afdeling E Block D15, it was known that HCV management program has satisfactory implemented on the field such as installation of signboard and marking of prohibited zone for agrochemicals application which presented through red paint marks on the palm.

Major 5.2.2 & Minor 5.2.4.

The biodiversity identification report has explained result of evaluation to become management and monitoring programs HCV in PT BBB for 2018 such as: Inventory and identification land cover every one year, marking of boundary HCV ever 1 year, conseling to the workers every 1 year, socialization to local communities every 1 year, monitoring flora and fauna every 1 year and reporting the report to agency related (Natural Resources Conservation Agency).

Minor 5.2.3.

The Company has showed the guidance handling technique Orang utan and protected wildlife with number of document 001/PT-HCV/III/2015 approved by CEO Grup. Based on field visit sighted poster in residential area (Afdeling C), the poster informs related the type of wildlife, sanction if the workers hunting and killing the wildlife amounted to IDR 100.000.000 and prison for 5 years lin accordance with regulation number 5 year 1990. Beside that, the company also installed signage that informs of hunting wildlife prohibiting, conservation responsibility and fire awareness that located in Suko Awin Jaya Villages, Tanjung Lanjut Villages and Bukit Baling Villages.

Based on with some workers (harvester, pesticide applicator, security etc) during field visit obtained information that the company has socialized that hunting prohibition in whole plantation area. They also well-known regarding to endangered species shall protected.

Minor 5.2.5.

Based on interview with local communities (Bukit Baling and Suko Awin Jaya Villages) and company representatives. its

known during now, there is community area is used to be as HCV area.

Status: Comply

5.3

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

Major 5.3.1.

The company has showed the report of identification waste sources and pollution for 2018 such as: Activities in Estate office, housing, storage, workshop, laboratorium, clinic, Generator room, transportation, waste mill. Furthermore for pollution such as: land clearing and replanting activities, transportation FFB, fertilizer application, pesticide application, electricity generator, and POME. The type of gasses are CO₂, CO, CH₄, NO₂, and others.

Major 5.3.2.

The company has permit to management of hazardous waste for PT BBB in accordance with number 04/Kep.Ka.BPTSP/III/2015 by *Badan Satu Pintu terpadu* (Investment Board of Jambi Province) date on March 25, 2015 valid until 5 years. In report hazardous waste quarter IV 2017 (October-December) has listed balance and manifest hazardous waste to transporter CV Surya Cipta Wisesa date on October 25, 2017 with number of vehicle BH 8419 AO such as: Filter oil 163 kg with manifest number AUJ 0000643; Oil used 2851 litre with manifest number AUJ 0000645, electronic lights 4.6 kg with manifest number AUJ 0000641; packaging hazardous material (pesticide) 23 kg with manifest number AUJ 0000640, used battery is 15 kg with manifest number AUJ 0000598, and rags used 54.5 kg with manifest number AUJ 0000642.

Vehicle with number BH 8419 AO has obtained a license from Ministry of Transportation Republic of Indonesia with decree number 4934 / AJ.309 / DJPD / 2017 / 150710344BB-0001 valid until October 17, 2018.

Medical waste transported to SCW on August 12, 2017 with number vehicle BH 8873 ME such as: Medical Waste 5 kg with manifest number AUJ 0000527. That's vehicle has been a license from Ministry of Transportation Republic of Indonesia with decree number SK.2943/AJ.309/DJPD/2017/150710344BB-0004 valid until July 21, 2018.

There is CLA between PT BBB with CV Surya Cipta Wisesa with number CLA 123855/BBB/SPK-R01-SM/IV/2017 valid from April 1st, 2017. CV SCW has been obtained permit from Ministry of Environmental Agency and Forestry with number 944/menlhk/Setjen/PLB3/12/2016 about permit to collected Hazardous waste and number S.424/VPLB3/PLB3/PLB.3/6/2016 about recommendation transported hazardous waste.

Hazardous waste is not properly managed.

Based on document review, the company hasn't policy or system to regulated related ban of hazardous waste used (packaging of pesticide and packaging of paint) as to water container. Based on field visit to Housing in Afdeling E BBB Estate its known workers used pesticide packaging to water container. Beside that, based on field visit to BBB Mill its known oil packaging not yet managed properly with guidance technique hazardous waste with document number PT/SUPP/II/2018/026. Its become **NCR Number 2018.03 with Major Category.**

Minor 5.3.3.

Not all waste is well managed.

The company has showed management domestic waste in site Procedure (Estate & Mill) No. SOP/SUPP/VIII/2015/001 its stated domestic waste must grouped, trown away in garbage, and transported to landfill ever 3 days. But based on observation visit and interview with resident Afdeling E its known there is an improper waste disposal. **Its become NCR No.2018.04 with Minor Category.**

Liquid waste.

Liquid waste discharge: based on the wastewater application report form to the land in February 2018 FFB process is 19,311.26 tons of FFB; Mill waste is 9,653.63 m³ and applied to field is 11,284.50 m³ and amount of flatbed filled is 1,612 and Volume m³ is 11,284.50 m³.

Clinical Waste.

Clinical wastes such as used bandages and former medicine packaging are collected in a particular plastic bag to be sent to the landfill once every 1 week.

Waste paper, plastic packaging and domestic waste.

Garbage collected is transported at least once a week or if the waste is full it sent to landfill. Subsequently, the carrier must record daily transportation activities in the forms already available for later submission to the Office. Landfill that has been filled ¾ or almost full immediately backfilled and made a new landfill.

Based interview with Environmental Agency there is no issues related environmental pollution.

Major 5.3.2	Status: NCR Number 2018.03 with Major Category.
Minor 5.3.3	NCR No.2018.04 with Minor Category.

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

The company has showed efficiency of fossil fuel use and the use of renewable energy for 2017 period such as: efficiency of Shell is 0.05 ton/ton FFB), efficiency of fiber is 0.09 ton/ton FFB. Efficiency use of electricity turbine 1 is 0.592 kwh/ton FFB, electricity turbin 2 is 2.689 kwh/ton FFB; Efficiency of Generator 1 is 0.214 kwh/ton FFB and efficiency of Generator 2 is 0.462 kwh/ton FFB.

Status: Comply

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

5.5.1 and 5.5.2

Based on the technical guidance of land preparation document (No: 008/PT/II/2014) stated that whole land preparation activity may only be performed in a mechanical way using heavy equipment. According to planting year profile and field visit, there is no new land preparation (expansion) or replanting activity was found.

Status: Comply

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

Major 5.6.1 & 5.6.2.

The company has listed identification of pollution and emission of GHG such as land clearing and replanting activities, transportation FFB, fertilizer application, pesticide application, electricity generator, and POME. The type of gasses are CO₂, CO, CH₄, NO₂, and others.

The company has a mitigation to reduce pollution and emissions plan. This plan informs Activities, objective, indicator, target, timeline, reduce activities, monitoring activities and PIC. The mitigations such as: avoid open land in HCV; Testing of emission and ambient air, fertilizer and Spraying technique, calculating of GHG, fuel savings, testing of liquid waste and others.

The company has showed result of noise testing of PT BBB which carried out by Social, Manpower and transmigration on RKL/RPL 2 nd Semester 2017 period report such as:

Location	Noise (dBa)	Type of jobs	Standards (dBa)/ 8 hours
Boiler	88.5	Boiler Operator	85
Sterilizer	104.4	Sterilizer Operator	85
Kernel Station	96.1	Kernel Operator	85

Based on explanation above, the testing analysis above the quality standards Ministry of environment Number 48 year 1996. The company has conducted an evaluation such as providing operator PPE (ear muff & ear plug), audiometric examination routinely, and others.

Minor 5.6.3.

The company has calculated Palm GHG version 3.0.1 2017 period such as:

Summary of Net GHG Emissions

Emissions per Product	tCO2e/tProduct
CPO	3.58
PK	3.58

Production	t/yr
FFB processed	342678.67
CPO Produced	66028.32

Extraction	%
OER	19,27
KER	5

Land use	ha
OP Planted area	4352
OP planted on peat	0
Conservation (forested)	0
Conservation (Non-forested)	30.66
Total	4352

Summary of field emissions and sinks

Emissions	Own Crop (Tco2e)	Plasma (Tco2e)	3 rd Party (Tco2e)	Total TCo2e)
Land conversion	30977.02	-	-	30977.02
*CO2 Emissions fertiliser	46992.46	-	-	46992.46
**N2O Emissions	6162.88	-	-	6162.88
Fuel Consumption	1696.39	-	-	1696.39
Peat Oxidation	0	-	-	0
Sinks	0			0
Crop sequestration	-40743.11	-	-	-40743.11
Conservation Sequestration	-281.15	-	-	-281.15
Total	44804.49	95288.51	93202.29	233295.3

Summary of Mill Emissions and Credits

	tCO2e	tCO2e/tFFB

Emissions		
POME	67170.82	0.2
Fuel consumption	426.07	0
Grid electricity	0	0
Utilization	0	0
Credits	0	0
Export of worker housing	-5495.21	-0.02
Sales of PKS	0	0
Sales of EFB	0	0
Total	62101.68	0.18

Palm oil Mill Effluent (POME) Treatment

Divert to compost	0 %
Divert to anaerobic digestion	100 %

POME Diverted to Anaerobic Digestion

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

Status: Comply

PRINCIPLE #6 Responsible consideration of employees and of individuals and communities affected by growers and mills

6.1

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

Major 6.1.1 & Major 6.1.2.

Social Impact Assessment was conducted on 22 February – 11 March 2013 by *Lingkar Komunitas Sawit* (LINKS), summary report of SIA was cover all potential impact as: land disputes, employment, infrastructure improvements, waste pollution and CSR for villagers. This assessment was involved internal and external stakeholders, as: workers union, head of village from Suko Awın Jaya, Bukit Baling, Suak Putat and Tanjung Lanjut Villages; also Akso Dano Cooperative.

Major 6.1.3.

Based on SIA report year of 2013, there are several recommendation for the company to mitigate the negative impacts and improve positive impacts. All recommendation has conducted by the company, for example: land disputes resolution with *Forum Masyarakat Petani* on February 2014, PPE's provided on December 2014, monthly scholarship and teacher salary, etc. The Company to be consider to create a specific time frame of Social Impact Management and Monitoring Plan (OFI).

Minor 6.1.4.

The company has reviewed the social impact management and monitoring plan dated 27 December 2017 until 6 January 2018. It was involved villagers from Suko Awın Jaya, Bukit Baling, Suak Putat and Tanjung Lanjut Village; the internal stakeholders was involve on monthly bipartite meetings. Based on evaluation result there are several social issues will monitor and manage by company, such as: economic livelihoods, religious and cultural, the community values, land rights to use and community access, education and healthy, transportation and communication facilities, and waste pollutions.

Minor 6.1.5.

The Company has agreements with plasma 1 and 2 under the Akso Dano Cooperative. The company were provides technical training and regular meetings. The cooperative confirms that the company has provided technical guidance even though the cooperation pattern is only in the form of sales of FFB to the company.

Major 6.1.3.

Status: OFI.

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.

Major 6.2.1 & minor 6.2.2.

The company has stakeholders list, there are six group of stakeholders. External Relation and communication guidance in accordance to procedure number 002/TAP/PRO-CSP/HO/XIII/10 dated 8 December 2010. The management unit shall have external relation activity plan and will monitored by CSR Officer, Division Head of CSR & Legal and CEO Regions.

Minor 6.2.3.

Based on verification of the complaint and grievance records, there are input or grievance from external stakeholders during last year. This is in accordance to interview with communities in Suko Awın Jaya and Bukit Baling Village during audit activities.

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.

Major 6.3.1 & Major 6.3.2.

The company has procedure of reception and handling of complaints from stakeholders number 124299/TAP/PRO-CSR-HO/IV/17 (Rev. 00) dated 28 April 2018. The procedure has sufficient to include some clauses, such as: a mechanism where workers make a complaint to another supervisor; whistle blower protection, and also RSPO Complaint system if the problem can't be resolved by the both of parties. There are also Memorandum from Deputy CEO of Sumatera Region number 12407/TAP/MIN-HRD-HO/IV/17 dated 17 April 2017 about email address and phone number for the complaint system. This procedure and memorandum has socialized to all workers dated 19, 26-27 April 2017 and also to the external stakeholders dated 16 May 2017. Based on document verification sighted there are no complaint from external stakeholders, however there are several complaint from workers and worker union related to harvesting tools and housing facilities during last year. All complaint has been response by the person in charge in accordance to the procedure.

Status: Comply

6.4

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

6.4.1 & 6.4.2

Until the ASA-3, there was no new expansion area of PT Brahma Binabakti, subsequently; there were no new land compensation process. The company has had procedure of land acquisition (SOP No: 002/TAP/PRO-CSP-HO/IV/10 dated 11 February 2013). Those procedure should be started with planning and socialization that involving estate staff and villager representatives. Land survey and measurement of land should be involving land user in order to verify land ownership, handover estimation cost and land compensation process. Based on public consultation result with village representative of Bukit Baling and Suko Awın Jaya Village on March 20th and 21st 2018 is known that there is no land dispute or claim since 2015. Land acquisition process should be carried out together with the sub-district and village as well as the compensation price must be negotiated together with land owners.

Based on interview with village representative regarding to land compensation process, all compensation has been paid fairly. For example, land compensation of Mr. Parjin (3.00 Ha) has been paid fairly. Whole compensation document saved

by Legal and CSR Department as follows handover letter by land owner, undisputed letter and minutes of land handover including photos. Until the audit, there was no complaint record regarding to it land.

6.4.3

There are also evidence of the records of identification of the compensated parties. For example:

- Minutes of meeting land handover.
- Land acquisition list.
- Land acquisition map.
- Receipt of personal payment attached with law seal, signature and fingerprint stamp and the photographs of payment.

Based on interview with Legal and CSR staff and document verification, land compensation document has set as restricted document due to sensitive cases.

There is no new compensation process since ASA-2. Whole document of compensation progress written in Bahasa and well-understood by the land owner or villagers. In order to ensure the agreement are transparent and fairly enough, whole document of land handover area signed and witnessed by the government.

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.

Major 6.5.1.

The Company has set wages in accordance with the provisions issued by the governor of Jambi Province number 1224/Kep.GUB/DISNAKAERS/2017 dated 31 October 2017 amount IDR 2,243,718.56 per month. According to the Human Capital Directorate circular letter dated 10 January 2018, the minimum wages year of 2018 are IDR 2,243,750 per month or IDR 89,750 per day. The entire deficiency of January wages was paid on February 2018. The company also has overtime system on estates and mill in accordance to relevant regulation. Based on pay slip verification and interview with several workers in Mill and Estate, sighted that all workers salary has paid above the Minimum Wages of Jambi Province; the auditor team also verified this issues with relevant agency during audit activities.

Major 6.5.2

There are Collective Labor (CLA) Agreement between company and worker unions period of May 4th, 2016 until May 4th, 2018. The CLA has registered to Man Power Agency of Muaro Jambi Regency with number 14/PKB/V/Sosnakertrans/2016. According to interview with worker union sighted that the CLA has been submitted to each workers on estate and mill. There are also contract workers in accordance to Man Power Decree Number 100 year of 2004, according to document verification there are 31 contract workers on Estate and 6 contract workers on Mill. In other that, sighted 29 free labor on estate. All free labor will be contract by management unit on April 2018, the auditor team has verified this document.

Minor 6.5.3 & Minor 6.5.4.

The company provides housing facilities with 2 rooms for married workers, transportation assistance such as school bus from site to the nearest school location and daycare. The company provides electricity every morning at 4-6 am and 6-11 pm. There are in four consumption cooperative to meet the family's basic needs. The Company provides clean water from both drilled wells and water derived from processing at the Mill. Based on interview with several workers in Mill and Estate, there are no issues about housing complex, clean water and basic need fulfilled.

Status: Comply

6.6

The employer respects the right of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.

Major 6.6.1

The company regulation was protect a freedom of association, there are two registered worker union: SPSI in Mill with register number 560.6/001/SP-SB/II/Sosnakertrans dated 23 February 2009. And also Worker Union (IPB3) in Estate with register number 560.6/09/SP-SB/III/SOSNAKERTRANS dated 3 March 2011.

Minor 6.6.2

The both of parties has conducted regular meeting every month on Bipartite Meetings activities. For example: minute of meeting dated 18 December 2018 sighted that bonus for all workers was paid on December 2017 and also discussed about electricity subsidy for housing complex that already have (*Perusahaan Listrik Negara*) PLN network.

Status: Comply

6.7

Children are not employed or exploited.

Major 6.7.1

The Company already has a policy that specifies the age requirements of workers with at least a minimum age of 18 years and prohibits child labor from working and helps parents work in the estates. Results of data tracking and interviews of workers, wives and children in residential settlements all confirmed the prohibition of child labor. Sanctions will be given to workers who are known to help their parents work in the estates.

Status: Comply

6.8

Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.

Major 6.8.1 & Major 6.8.2

The Company already has a discriminatory policy stipulated in company regulations and recruitment procedure. From company data, workers come from various ethnic tribes such as Java, Sundanese, Malay and Batak. The results of interviews with workers, they confirm no racial treatment of the company.

Minor 6.8.3

In the SOP the company has included the terms of discrimination free. All workers are allowed to occupy certain positions / types of work according to their ability. Based on interview with several workers in mill and estate, there was no difference in the treatment between local workers (Malay) and other workers (Batak, Java).

Status: Comply

6.9

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

Major 6.9.1 & Major 6.9.2.

The company has policy to prevent sexual harassment on Company Regulation Section VI clause 12. The head of gender committee is Mrs. Irena Astria Ginting. Based on interview with gender committee sighted that there are no sexual harassment cases during last year. The company also has socialized about sexual harassment on 10 May 2017 cooperation with Police department and Man Power Agency. There are also reproduction protection policy on Company Regulation clause 25, the women workers is prohibited from chemical handling activities. The company also performing a pregnancy test every month by a company doctor.

Minor 6.9.3.

The company has procedure of reception and handling of complaints from stakeholders number 124299/TAP/PRO-CSR-HO/IV/17 (Rev. 00) dated 28 April 2018. The procedure has sufficient to include some clauses, such as: a mechanism where workers make a complaint to another supervisor; whistle blower protection, and also RSPO Complaint system if the problem can't be resolved by the both of parties.

Status: Comply

6.10

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

Minor 6.10.1 & Major 6.10.2

The FFB price in accordance to Plantation Agency in Province Jambi, for example period of 9 – 15 March is IDR 1,810.63/Kg. Based on interview with FFB Purchasing staff sighted that FFB price was informed to the Cooperative board and supplier. Therefore interview with Akso Dano Cooperative board, they were followed FFB price meeting in Plantation Agency of Jambi Province.

Minor 6.10.3 & minor 6.10.4

The company already has agreement with Ako Dano Cooperative and all FFB suppliers. In each agreement already include terms and terms of payment, sorting method and integrity agreement. Each party has signed and has a copy of the agreement. Based on document verification and interview with Akso Dano Cooperative, there are no problem related to FFB payment every period/months.

Status: Comply

6.11

Growers and millers contribute to local sustainable development wherever appropriate.

Minor 6.11.1.

The company has CSR program year of 2018 with participatory of villagers. The CSR program on the infrastructure aspect, education and cultural aspect, training for smallholders, etc. Beside that's there are also agreement between companies with local contractor number 001/BBB-SAWIT/SPK-PRO-SITE/XII/2017 dated 21 December 2017 about FFB transport valid until 30 June 2018.

Minor 6.11.2

The company has program to improve best management practices to the smallholders. For example: manuring training at 11 September 2017 to the Tani Kulim Group Farmers, Pesticide application training to the Tani Tembesu Group Farmers at 28 August 2017, etc.

Status: Comply

6.12

No forms of forced or trafficked labour are used.

Major 6.12.1

There are Internal Memo number 20180301/TAP/OPR-01-BBB/III/18 about force to work and human trafficking. Based on interview with several workers in Mill and estate there are no force to work issues. All overtime was paid in accordance to national regulations. Beside that's according to interview with harvester, sighted that work hours from 7.00 am – 14.00 pm. When the low crop, they have minimum basis in accordance to target area of the least 4 hectare. There are no violating the wage regulation and force to work.

Minor 6.12.2 & Major 6.12.3

Based on Man Power Existing document verification and interview with several workers in mill and estate, there are no migrant workers in the company.

Status: Comply

6.13

Growers and millers respect human rights

6.13.1.

The company regulation has explain about the company respects human rights, recognizes and provides an opportunity for every employee with equal right to move forward and be given the opportunity to be worker union without any restriction and discrimination or due to differences in ethnicity, religion, race and interclass. Based on interview with workers union and several workers in mill and estate, there are no discrimination due to differences of ethnic, religion and race.

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.
<p>Based on the statement area, Brahma Binabakti Estate Estate did not open the land above November 2005. Land clearing was conducted in 1995. This is in accordance with email from RSPO dated March 16th, 2018 PT Brahma Binabakti Estate has disclosed with zero non compliant land clearance.</p> <p>Based on interview with Management representative, planted on 2006 & 2007 are Plasma and own estate PT BBB. Distribution of land is 30% for Own estate and 70% for smallholders. The last year land clearing for area planted on 2006 & 2007 was conducted in September 2004. There is cooperation agreement for land clearing on September 3rd, 2004 between PT Kirana Sekernan with Cooperative unit of Akso Dano Village.</p>
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.
<p>Major 7.2.1 and Minor 7.2.2</p> <p>Based on the statement area, Brahma Binabakti Estate Estate did not open the land above November 2005. Land clearing was conducted in 1995. This is in accordance with email from RSPO dated March 16th, 2018 PT Brahma Binabakti Estate has disclosed with zero non compliant land clearance.</p> <p>Based on interview with Management representative, planted on 2006 & 2007 are Plasma and own estate PT BBB. Distribution of land is 30% for Own estate and 70% for smallholders. The last year land clearing for area planted on 2006 & 2007 was conducted in September 2004. There is cooperation agreement for land clearing on September 3rd, 2004 between PT Kirana Sekernan with Cooperative unit of Aksadano Village.</p>
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.
<p>7.3.1; 7.3.2; 7.3.3; 7.3.4 & 7.3.5.</p> <p>Based on areal statement, Brahma Binabakti Estate not clearing land above November 2005. The land clearing was conducted on 1995 -1998. This is accordance with email from RSPO dated on March 16, 2018 (PT Brahma Binabakti with own estate) has disclosed with zero non compliant land clearance.</p> <p>Based on interview with Management representative, planted on 2006 & 2007 are Plasma and own estate PT BBB. Distribution of land is 30% for Own estate and 70% for smallholders. The last year land clearing for area planted on 2006 & 2007 was conducted in September 2004. There is cooperation agreement for land clearing on September 3rd, 2004 between PT Kirana Sekernan with Cooperative unit of Aksadano Village.</p>
Status: Comply
7.4
Extensive planting on steep terrain, and/or on marginal and fragile soils, is avoided.
<p>Minor 7.4.1 and Major 7.4.2</p> <p>Based on the statement area, Brahma Binabakti Estate Estate did not open the land above November 2005. Land clearing was conducted in 1995. This is in accordance with email from RSPO dated March 16th, 2018 PT Brahma Binabakti Estate has disclosed with zero non compliant land clearance.</p> <p>Based on interview with Management representative, planted on 2006 & 2007 are Plasma and own estate PT BBB. Distribution of land is 30% for Own estate and 70% for smallholders. The last year land clearing for area planted on 2006 & 2007 was conducted in September 2004. There is cooperation agreement for land clearing on September 3rd, 2004 between PT Kirana Sekernan with Cooperative unit of Aksadano Village.</p>

	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.		
<p>Based on the statement area, Brahma Binabakti Estate Estate did not open the land above November 2005. Land clearing was conducted in 1995. This is in accordance with email from RSPO dated March 16th, 2018 PT Brahma Binabakti Estate has disclosed with zero non compliant land clearance.</p> <p>Based on interview with Management representative, planted on 2006 & 2007 are Plasma and own estate PT BBB. Distribution of land is 30% for Own estate and 70% for smallholders. The last year land clearing for area planted on 2006 & 2007 was conducted in September 2004. There is cooperation agreement for land clearing on September 3rd, 2004 between PT Kirana Sekernan with Cooperative unit of Aksadano Village.</p>		
	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.		
<p>Minor 7.4.1 and Major 7.4.2</p> <p>Based on the statement area, Brahma Binabakti Estate Estate did not open the land above November 2005. Land clearing was conducted in 1995. This is in accordance with email from RSPO dated March 16th, 2018 PT Brahma Binabakti Estate has disclosed with zero non compliant land clearance.</p> <p>Based on interview with Management representative, planted on 2006 & 2007 are Plasma and own estate PT BBB. Distribution of land is 30% for Own estate and 70% for smallholders. The last year land clearing for area planted on 2006 & 2007 was conducted in September 2004. There is cooperation agreement for land clearing on September 3rd, 2004 between PT Kirana Sekernan with Cooperative unit of Aksadano Village.</p>		
	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.		
<p>7.7.1 and 7.7.2</p> <p>Based on the technical guidance of land preparation document (No: 008/PT/II/2014) stated that whole land preparation activity may only be performed in a mechanical way using heavy equipment. According to planting year profile and field visit, there is no new land preparation (expansion) or replanting activity was found.</p> <p>Based on the statement area, Brahma Binabakti Estate Estate did not open the land above November 2005. Land clearing was conducted in 1995. This is in accordance with email from RSPO dated March 16th, 2018 PT Brahma Binabakti Estate has disclosed with zero non compliant land clearance.</p> <p>Based on interview with Management representative, planted on 2006 & 2007 are Plasma and own estate PT BBB. Distribution of land is 30% for Own estate and 70% for smallholders. The last year land clearing for area planted on 2006 & 2007 was conducted in September 2004. There is cooperation agreement for land clearing on September 3rd, 2004 between PT Kirana Sekernan with Cooperative unit of Aksadano Village.</p>		
	Status: Comply	
7.8 New plantation developments are designed to minimise net greenhouse gas emissions.		
<p>7.8.1. & 7.8.2.</p> <p>Based on document review and field observation, there is no new land clearing / area expansion. Based on the statement</p>		

area, Brahma Binabakti Estate Estate did not open the land above November 2005. Land clearing was conducted in 1995. This is in accordance with email from RSPO dated March 16th, 2018 PT Brahma Binabakti Estate has disclosed with **zero non compliant land clearance**.

Based on interview with Management representative, planted on 2006 & 2007 are Plasma and own estate PT BBB. Distribution of land is 30% for Own estate and 70% for smallholders. The last year land clearing for area planted on 2006 & 2007 was conducted in September 2004. There is cooperation agreement for land clearing on September 3rd, 2004 between PT Kirana Sekernan with Cooperative unit of Akso Dano Village.

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.

Social Aspect.

Improvement of housing complex maintenance budget period of 2018 – 2020.

Internal Audit

The company has conducted internal audit RSPO on 15 – 19 January 2018 and got some non conformities. All non conformities has been closed during management review on 10 February 2018.

Status: Comply

3.2. Summary of Assessment Report of Supply Chain Requirement

3.2.1 General Chain of custody requirements for the supply chain

Clause	Requirement
5.1	Applicability of the general chain of custody requirements for the supply chain
5.1.1	<p>The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. After the end product manufacturer, there is no further requirement for certification.</p> <p>Question: Does the organization take legal ownership and physically handles RSPO Certified Sustainable oil palm products at their premises or through the outsourcers?</p> <p>No.</p> <p>Facility sold their CSPO and CSPK directly to the buyer according to the contract. For example, CPO sales contract No. 2010101070 dated October 2017 with PT. Wilmar Nabati Indonesia and sales contract CSPK No. 2010101060 dated October 2017 with PT. Usaha Inti Padang. Whole palm oil product directly handling by buyer since dispatching from mill.</p> <p style="text-align: right;">Status: Comply</p>
5.1.2	<p>Traders and distributors require a license obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model.</p> <p>Question: Is the organization buying from RSPO licensed traders who pass the certification number of the product manufacturer and the applicable supply chain model?</p> <p>No.</p> <p>Facility sold their CSPO and CSPK directly to the buyer according to the contract. There is no trading activity of mill.</p> <p style="text-align: right;">Status: Comply</p>
5.1.3	<p>Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform.</p> <p>Question: Is the site level or its parent company a member of RSPO and registered on RSPO IT platform?</p> <p>Yes.</p> <p>PT Brahma Binabakti, has registered in RSPO membership 1-0147-13-000-00.</p> <p>Brahma Binabakti has been registered in IT platform palm trace RSPO https://palmtrace.rspo.org/web/rspo/member-directory which information as follows:</p> <ul style="list-style-type: none"> • Member Name: PT. Brahma Binabakti • Account UID: RSPO_AC1000001639 • Core Product: Palm Oil • Member ID: RSPO_PO100001619 • Member Category: Oil Mill <p style="text-align: right;">Status: Comply</p>
5.1.4	<p>Processing aids do not need to be included within an organization's scope of certification.</p>

Question: Is the site level or its parent had a processing aids?	
No. Facility has not using processing aids.	
	Status: Comply
5.2	Supply chain model
5.2.1 The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.	
Question: Has the organization applied the Supply Chain Model correctly?	
Yes, mill has applied Mass Balance (Module E) for mill.	
	Status: Comply
5.2.2 The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	
Question: Has the organization applied a combination of Supply Chain Model correctly?	
Brahma Binabakti Mill using Mass Balance (Module E) for mill.	
	Status: Comply
5.3	Documented procedures
5.3.1 The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified.	
Questions : Documented procedures established and covering all provisions following:	
<ul style="list-style-type: none"> • Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. • Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). • Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organization's procedures for the implementation of this standard. 	
Yes. Facility has had supply chain procedure that divided into:	
<ol style="list-style-type: none"> 1. SOP of Calculation and Recording of certified FFB, CSPO & CSPK in Mass Balance Modul. 2. SOP of traceability of FFB, CPO & PK in Mass Balance Modul. 	
Those procedure explained that FFB from own estate claimed as certified product and FFB from associated smallholder/outgrower claimed as non-certified product. However, Based on field visit and legal boundary observation in Block C10 Afdeling C, C15 and F7 Afdeling Afdeling G found that boundary poles located in the middle of planting area that stated as Production Forest/Conversion Production Forest. In addition, the results of interviews with weighbridge operator obtained information that all the FFB delivery note from the own estate were stamped "certified". However, the FFB receiving system and procedure at weight stations has not yet accommodated the separation of FFB from own estate with HGU and non HGU status. Non Conformity No. 2018.5.	
	Status: Non Conformity No. 2018.5 indicator Major.
5.3.2 The site shall have a written procedure to conduct annual internal audit	
Question :	
Documented annual internal audit procedures established and covering all provisions :	
i) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and	

Claims Documents.	
ii) Effectively implements and maintains the standard requirements within its organization.	
Yes.	
Facility has had supply chain procedure as written in indicator 5.3.1 above that explained internal audit will be held annually.	
	Status: Comply
5.4	Purchasing and goods in
5.4.1	
The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier	
Question :	
All RSPO product information is provided by suppliers in accordance with :	
<ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment / delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply Chain certificate number of the seller; • A unique identification number • Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation). • The site receiving RSPO certified oil palm products shall ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements/Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. Refer to section 5.7.1 of this document for further guidance. • A check of the validity of the Supply Chain Certification of suppliers is required for all sites that are SC certified. This shall be checked via the list of RSPO Supply Chain Certified sites on the RSPO website (www.rspo.org) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements. • The validity of license for traders and distributors shall also be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcements/announcements. 	
Yes.	
Facility has documented all information of their palm oil products buyer as per transaction in transaction document.	
	Status: Comply
5.4.2	
The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents	
Question :	
Has the organization established mechanism in place for handling non-conforming oil palm products and/or documents?	
Not applicable.	
Facility does not have any outsource palm oil products.	
	Status: Comply
5.5	Outsourcing activities
5.5.1	

In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mill cannot outsource processing activities like refining or crushing.

Question: Are the outsourcers RSPO certified?

Not applicable.

Facility sell their product (CPO and PK) to the buyer directly.

Status: Comply

5.5.2

Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:

- a. The site has legal ownership of all input material to be included in outsourced processes;
- b. The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.
- c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.
- d. The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance

Question: Has the site established outsourcing procedures, agreement and keeps legal ownership of the products during the outsourcing

Not applicable.

Facility sell their product (CPO and PK) to the buyer directly.

Status: Comply

5.5.3

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

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

Not applicable.

Facility sell their product (CPO and PK) to the buyer directly.

Status: Comply

5.5.4

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

Question: Has MUTU informed about any new outsourcers?

Not applicable.

Facility sell their product (CPO and PK) to the buyer directly.

Status: Comply

5.6

Sales and goods out

5.6.1

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

Question:

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

- The name and address of the seller;
- The loading or shipment / delivery date;
- The date on which the documents were issued;
- A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);
- The quantity of the products delivered;
- Any related transport documentation;
- Supply chain certificate number of the seller;
- A unique identification number.
- Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products
- For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. Refer to section 5.7.1 of this document for further guidance.

Yes.

Whole RSPO product information has available in the documents especially in monthly report in mill. Those document contains information such as name and address of buyer, contract number, quantity, transported date, certified or non certified requirements, stamp etc.

Status: Comply

5.7 Registration of transactions

5.7.1

Supply chain actors who:

are mills, traders, crushers and refineries; and

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

Question:

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

Yes.

Facility has shown their transaction document that consist registration in IT platform.

Status: Comply

5.7.2

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

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

Question :

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

Yes.	
Facility sell their product (CPO and PK) to the buyer directly. Whole transaction of CSPO/CSPK has been declared in RSPO IT Platform.	
	Status: Comply
5.8	Training
5.8.1	
The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff	
Question: Has the organization established RSPO training plan?	
Yes.	
Facility has been held regular training of supply chain. The last training conducted on June 2017 which attended by seven (7) personnel (mill staff and officer). Based on supply chain procedure, mill has been scheduled annual training of supply chain.	
	Status: Comply
5.8.2	
Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed	
Question: Has the organization Delivered Effective RSPO training?	
Yes.	
Facility has been held regular training of supply chain. The last training conducted on June 2017 which attended by seven (7) personnel (mill staff and officer). Based on supply chain procedure, mill has been scheduled annual training of supply chain.	
	Status: Comply
5.9	Record keeping
5.9.1	
The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements	
Question: All records are accurate, complete, up-to-date and accessible?	
Yes.	
The document has recorded in monthly report in mill and accessible through the weight bridge computerized system.	
	Status: Comply
5.9.2	
Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock	
Question: All records are kept for minimum two years and comply with legal and regulatory requirements?	
Yes.	
According to the latest supply chain procedure (SOP of traceability of FFB, CPO & PK in Mass Balance Modul) clause IV.18 obtained all records of supply chain are kept for 5 years.	
	Status: Comply

5.9.3	
The organization shall be able to provide the estimate volume of palm oil / palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.	
Question: For all palm oil / palm kernel oil volumes purchased (input) and claimed (output) records kept over a period of twelve (12) months?	
Yes. Facility estimated their palm product which is written in annex of ASA-2 certificate and monitored in three-monthly bases. If any overproduction, facility will inform the CB.	
	Status: Comply
5.10	Conversion factors
5.10.1	
Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org); RSPO Rules for Physical Transition of Oleochemicals and its Derivatives. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries	
Question: Conversion rates applied accurately?	
Not applicable. Facility did not using conversion rate.	
	Status: Comply
5.10.2	
Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	
Question: Conversion rates periodically updated?	
Not applicable. Facility did not using conversion rate.	
	Status: Comply
5.11	Claims
5.11.1	
The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.	
Question: Any communication to any stakeholder group / customers issued in accordance with RSPO Rules on Market Communications and Claims?	
Not applicable. Facility did not using logo during communication with stakeholder / customer.	
	Status: Comply
5.12	Complaints
5.12.1	
The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	

Question: Documented procedures for stakeholders complaints established?	
Yes. Facility has had documented procedures (SOP of traceability of FFB, CPO & PK in Mass Balance Modul).	
	Status: Comply
5.13	Management review
5.13.1	
The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken	
Question: Management reviews performed annually at planned intervals?	
Not applicable at this moment. It will be verify in the next assessment (ASA-4).	
	Status: Comply
5.13.2	
The input to management review shall include information on: Results of internal audits covering RSPO Supply Chain Certification Standard. Customer feedback. Status of preventive and corrective actions. Follow-up actions from management reviews. Changes that could affect the management system. • Recommendations for improvement.	
Question: Has all input required above has been included in the management review?	
Not applicable at this moment. It will be verify in the next assessment (ASA-4).	
	Status: Comply
5.13.3	
The output from the management review shall include any decisions and actions related to: • Improvement of the effectiveness of the management system and its processes. • Resource needs.	
Question: Has all output required above has been included in the management review?	
Not applicable at this moment. It will be verify in the next assessment (ASA-4).	
	Status: Comply

3.2.2 (Module E) CPO Mills - Mass Balance Requirements

Clause	(Module E) CPO Mills - Mass Balance Requirements												
E.1	Definition												
E.1.1	<p>Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and volume sales of RSPO certified producers. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p> <p>SCSS module used in Brahma Binabakti Mill is Mass Balance (MB), because the mill receives FFB from the estate that has been certified by RSPO and non-certified RSPO. Source or supplier of FFB received by the mill can be classified into three categories: own estates, associated smallholder and independent suppliers / third parties.</p>												
	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 produced should then be recorded in each subsequent annual surveillance report.</p> <p>Estimates of CPO and PK generated by Brahma Binabakti Mill have been noted in the report ASA-2 RSPO.</p> <table border="1"> <thead> <tr> <th>Product</th> <th>Estimated in certificate (Ton)</th> <th>Realization until March 17th 2018 (Ton)</th> </tr> </thead> <tbody> <tr> <td>FFB</td> <td>81,200</td> <td>65,922</td> </tr> <tr> <td>CPO</td> <td>17,864</td> <td>14,363</td> </tr> <tr> <td>PK</td> <td>4,303</td> <td>3,415</td> </tr> </tbody> </table>	Product	Estimated in certificate (Ton)	Realization until March 17 th 2018 (Ton)	FFB	81,200	65,922	CPO	17,864	14,363	PK	4,303	3,415
Product	Estimated in certificate (Ton)	Realization until March 17 th 2018 (Ton)											
FFB	81,200	65,922											
CPO	17,864	14,363											
PK	4,303	3,415											
	Status: Comply												
E.2.2	<p>The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).</p> <p>Brahma Binabakti Mill has registered in RSPO membership 1-0147-13-000-00.</p> <p>Brahma Binabakti has been registered in IT platform palm trace RSPO https://palmtrace.rspo.org/web/rspo/member-directory which information as follows:</p> <ul style="list-style-type: none"> • Member Name: PT. Brahma Binabakti • Account UID: RSPO_AC1000001639 • Core Product: Palm Oil • Member ID: RSPO_PO100001619 • Member Category: Oil Mill <p>PK Sales Information</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Volume (Ton)</th> <th>Buyer Name</th> <th>Claimed</th> </tr> </thead> <tbody> <tr> <td>July 2017</td> <td>200</td> <td>PT. USAHA INTI PADANG</td> <td rowspan="2">RSPO</td> </tr> <tr> <td>August 2017</td> <td>42.04</td> <td>PT. USAHA INTI PADANG</td> </tr> </tbody> </table>	Month	Volume (Ton)	Buyer Name	Claimed	July 2017	200	PT. USAHA INTI PADANG	RSPO	August 2017	42.04	PT. USAHA INTI PADANG	
Month	Volume (Ton)	Buyer Name	Claimed										
July 2017	200	PT. USAHA INTI PADANG	RSPO										
August 2017	42.04	PT. USAHA INTI PADANG											

September 2017	378.7	PT. USAHA INTI PADANG	
Oktober 2017	244.98	PT. USAHA INTI PADANG	
November 2017	124.03	PT. USAHA INTI PADANG	
December 2017	262.18	PT. USAHA INTI PADANG	
January 2018	68.47	PT. USAHA INTI PADANG	
February 2018	119.52	PT. USAHA INTI PADANG	
March 2018	191.28	PT. USAHA INTI PADANG	
Total	1,690.55		

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.

Brahma Binabakti Mill has had SOP of RSPO Products Supply Chain Mass Balance Module procedure that divided into:

1. SOP of Calculation and Recording of certified FFB, CSPO & CSPK in Mass Balance Modul.
2. SOP of traceability of FFB, CPO & PK in Mass Balance Modul.

This procedure describes the parties involved in the process of SCCS, duties and responsibilities of each party, FFB admissions process, weighing the weight / volume, checking the quality of raw material, processing, monitoring the processed products and the products shipment. Mill manager had an authority over implementation of RSPO supply chain standard for mill. Based on interviews with security and weight bridges operator showed that the employee has already known their responsibilities regarding to implementation of supply chain system. Mill has been held regular training of supply chain. The last training conducted on June 2017 which attended by seven (7) personnel (mill staff and officer).

Status: Comply

E.3.2

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

Brahma Binabakti Mill has had SOP of RSPO Products Supply Chain that describes the process of FFB admissions from supplier estates. The results of field visits and verification of documents showing that the FFB received by Brahma Binabakti Mill comes from estates that have certified by RSPO and estates outside parties that have not been certified by RSPO. The entire estate that has been certified by RSPO has being recorded with computerized systems and given a special code.

NO	OWN ESTATE		ASSOCIATED SMALLHOLDER		SUPPLIER / OUTGROWER	
	KODE SAP	Supplier BBB	KODE SAP	Supplier BBB	KODE SAP	Supplier BBB
1	VINT_2121	ESTATE SEKERNAN	VINT_2131	PLASMA PEMAYUNG	2016200001	AHMAD SUNARYO
2			2400000154	Melati 1C	2016200002	ALAMSYAH BRAKSAN
3			2400000070	Melati 3	2016200004	AMIR SUNARSO
4			2400000159	Melati 4	2016200005	ANDI KURNIAWAN
5			2400000071	Melati 5	2016200006	ANTO CS
6			2400000072	Melati 7	2016200007	APN
7			2400000003	Anggrek 1A	2016200009	ASM
8			2400000004	Anggrek 1B	2016200011	BRATANATA. U
9			2400000005	Anggrek 1C	2016200012	BRIAN

10			2400000000	Anggrek 2	2016200014	DEDI DS)*
11			2400000001	Anggrek 3	2016200015	GIANTO
12			2400000002	Anggrek 4	2016200016	HARI JAYA
13			2400000074	Nusa Indah 1	2016200017	IFAN
14			2400000075	Nusa Indah.2	2016200021	M SYUKUR ABADI
15			2400000076	Nusa Indah.3	2016200022	MONICA PURBA
16			2400000051	Kenanga 1A	2016200023	NABILA/ISKANDAR
17			2400000052	Kenanga 1B	2016200025	P GINTING
18			2400000053	Kenanga 2A	2016200026	P SINGARIMBUN
19			2400000054	Kenanga 2B	2016200027	PARDEDE
20			2400000050	Kenanga 3	2016200028	ASP, PT
21			2400000043	Kemuning 4	2016200029	SKN, PT
22			2400000044	Kemuning 5	2016200032	RHAKES)*
23			2400000045	Kemuning 6	2016200033	RIBUNA
24			2400000027	Cempaka 1	2016200034	RIZAL
25			2400000028	Cempaka 2	2016200036	SARDI
26			2400000029	Cempaka 3	2016200037	SENEN (SM))*
27			2400000034	Cempaka 4A	2016200039	SITEPU
28			2400000035	Cempaka 4B	2016200041	SUKAWI
29			2400000030	Cempaka 5	2016200042	SUMARJO / YAYASAN
30			2400000031	Cempaka 6	2016200043	SURJANA
31			2400000032	Cempaka 7	2016200160	JOHAN
32			2400000033	Cempaka 8	2016200161	IRAWAN
33			2400000038	Dahlia.1	2016200163	MULTI PALMA LESTARI, CV
34			2400000039	Dahlia.2	2016200169	PT. MENDALO PRIMA INTILAND
35			2400000040	Dahlia.3	2016200170	VELINDO ANEKA TANI, PT
36			2400000041	Dahlia.4	2016200171	WIRA TANI MAKMUR, CV
37			2400000065	Mekar Sari 2	2016200172	PT. LADANG SAWIT SEJAHTERA
38			2400000067	Mekar Sari 3	2016200174	BURHAN (YONGSAN)
39			2400000068	Mekar Sari 4	2016200175	HASIP SYAM
40			2400000069	Mekar Sari 5	2016200176	PANTUN
41			2400000093	Seruni	2016200177	GISKA
42			2400000015	Asoka 1A	2016200178	MAJU BERSAMA
43			2400000016	Asoka 1B	2016200179	KASIH ALBAROS
44			2400000007	Asoka 2	2016200181	RIDHO ILAHI
45			2400000017	Asoka 3 A	2016200182	RUDY S
46			2400000018	Asoka 3 B	2016200183	ANDIKA)*
47			2400000008	Asoka 4	2016200184	DOGLAS)*
48			2400000019	Asoka 4b	2016200185	MEDAYU
49			2400000009	Asoka 5	2016200186	JIMMY
50			2400000138	Asoka 6	2016200187	SEJAHTERA MANDIRI SAWIT
51			2400000010	Asoka 7	2016200188	SUMBER SAWIT SEJAHTERA
52			2400000011	Asoka 8	2016200189	SALWA
53			2400000012	Asoka 9	2016200191	RANDY P
54			2400000020	Asoak 9a	2016200192	SAFA
55			2400000021	Asoak 9c	2016200193	TJIPTO
56			2400000013	Asoka 10	2016200194	JAYA MULYA
57			2400000014	Asoka 11	2016200195	JASA LINTAS PRODUKSI
58			2400000062	Mawar 1A	2016200196	BINTANG UTAMA
59			2400000064	Mawar 1B	2016200197	WF
60			2400000059	Mawar 2	2016200198	WA
61			2400000060	Mawar 3	2016200199	JUHARI
62			2400000061	Mawar 4	2016200200	CV TUGINO
63			2400000095	Seroja 1A	2016200201	SUMBER JAYA
64			2400000137	Seroja 1B	2016200202	YM)*

65			2400000094	Seroja 2	2016200203	AND)*
66			2400000105	Teratai 1A	2016200205	SINAR JAYA
67			2400000106	Teratai 1B	2016200206	RANJANI
68			2400000107	Teratai 1C	2016200207	TR)*
69			2400000108	Teratai 2 A	2016200208	NUSA JAYA - SILAHUDDIN
70			2400000109	Teratai 2 B	2016200209	ALVIN - ROMI
71			2400000110	Teratai 3.A	2016200210	ABIYU - JAINURI
72			2400000111	Teratai 3B	2016200212	AGGRAINI)*
73			2400000103	Teratai 4	2016200213	GNT - NIA AUDINA
74			2400000104	Teratai 5	2016200215	SB - SAIPUL BAHRI)*
75			2400000046	Kemuning 1 A	2016200216	HYD)*
76			2400000047	Kemuning 1 B	2016200219	IDA-IDARIANTI
77			2400000048	Kemuning 2 A	2016200220	PUTRA PLABI
78			2400000049	Kemuning 2 B	2016200221	JTM - JATMIKO)*
79			2400000042	Kemuning 3	2016200222	ML - MULYONO
80					2016200223	AMIRA - DAVIDSON SANDY
81					2016200224	HN - HAMDANI NAINGGOLAN)*
82					2016200225	ANAM – SUTINAH
83					2016200227	SEN-SAKBAN EKO WINATAN
84					2016200228	JUANDA - ADITYA PUTRA
85					2016200229	SUNDARI
86					2016200230	RIFKY-RIFKY JUANDA
87					2016200232	KHESATRIA JAYA - TURSUMI
88					2016200233	SY-SYIN HARIJAH
89					2016200235	NW
90					2016200236	DHEA - AINI
91					2016200237	A.K - ANDRIO TAMA KURNIAWAN
92					2016200238	Petrus - Petrus Hilman Dapot T
93					2016200239	R. PURBA PP- R.PURBA PURNAMA B
94					2016200240	AN-ATINA
95					2016200241	ADS-ANDA SYAFRIL
96					2016200242	RR-SAMI
97					2016200243	KADIYO
98					2016200244	A.N.T-Anton Susantoni
99					2016200246	PN - PONIMAN
100					2016200247	STJ - SUTARJOLI
101					2016200248	BMD
102					2016200249	TAGOR SAMOSIR
103					2016200250	SPS – SOEPARSO
104					2016200251	AD - ANDRI
105					2016200252	LBS - M. HANAFI L
106					2016200254	Kristo
107					2016200255	Muslimin NS - Febrianto
108					2016200271	IR. SUGIHARTO
109					2016200272	AINA - AHMAD DAHLAN
110					2016200274	DN-HAMDANI
111					2016200275	DO. ZPN
112					2016200276	BG-ALI IDRIS
113					2016200277	EMRA
114					2016200278	DANIEL BRIA
115					2016200279	SYAMSU RIZAL
116					2016200280	CV. 58 JAYA
117					2016200281	Reyhan
118					2016200282	Redi

Weight bridge operator says that all supplier has been registered in system. It means outsider supplier or unregistered supplier cannot accept in mill.

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.

Estimates of CPO and PK generated by Brahma Binabakti Mill have been noted in the report ASA-2 RSPO.

Product	Estimated in certificate	Realization until March 17 th 2018
	(Ton)	(Ton)
FFB	81,200	65,922
CPO	17,864	14,363
PK	4,303	3,415

Based on three-monthly bases data that summarize by purchasing staff obtained volumes of certified and non-certified as follows:

Month	FFB Received (Ton)		
	Sustainable	Non sustainable	Total
26 - 31 May 2017	1,364	3,907	5,271
June 2017	6,431	18,065	24,495
July 2017	8,832	21,610	30,442
Sub Total (Kg)	16,627	43,582	60,208
(%)	27.62	72.38	100
August 2017	7,856	21,931	29,787
September 2017	6,682	18,472	25,154
October 2017	6,913	20,166	27,079
Sub Total (Kg)	21,451	60,569	82,020
(%)	26	74	100
November 2017	7,252	19,784	27,036
December 2017	6,846	19,229	26,075
January 2018	6,209	19,114	25,323
Sub Total (Kg)	20,307	58,126	78,434
(%)	26	152	178
February 2018	4,804	14,536	19,340
1 - 17 March 2018	2,734	8,873	11,606
Sub Total (Kg)	7,537	23,409	30,946
(%)	24	585	609
Grand Total (Kg)	65,922	185,686	251,608
(%)	26	74	187
Grand Total (Kg)	65,922	223,216	251,608

Status: Comply

E.4.2

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

Brahma Binabakti Mill has had SOP of RSPO Products Supply Chain Mass Balance Model which describes about If licensed production projections are bigger than the certified product that has been claimed, the things to do are: to inform the related RSPO certification body and the party of RSPO IT system / e-trace.

Brahma Binabakti Mill has recorded every acceptance of FFB, CPO production and PK production. The document verification results in the period of May 26th 2017 – March 17th 2018 showed that the production of RSPO certified products does not exceed the projected, that is:

Product	Estimated in certificate (Ton)	Realization until March 17 th 2018 (Ton)	Variant (Ton)
FFB	81,200	65,922	15,278
CPO	17,864	14,363	3,501
PK	4,303	3,415	888

Through the table above concluded that the mill has had the remaining quota to produce certified product during the remaining the certificate period.

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.)

Brahma Binabakti Mill has had a monthly report which describes about FFB Acceptance, CPO Production, PK Production, CPO Shipping, PK Shipping and product stocks. During the period of May 26th 2017 – March 17th 2018 there are no shipping of CSPO and CSPK. The following is a product dispatch data from Brahma Binabakti Mill:

Period	CPO Delivery (ton)			PK Delivery (ton)		
	RSPO	Uncertified / Conventional	Other Scheme	RSPO	Uncertified / Conventional	Other Scheme
26 - 31 May 2017	-	544	-	-	166	-
June 2017	-	4,658	-	200	1,380	-
July 2017	-	6,658	-	42	1,194	-
August 2017	-	6,943	-	379	1,497	-
September 2017	-	4,561	-	245	938	-
October 2017	-	4,308	-	124	1,334	-
November 2017	-	6,181	-	262	1,133	-
December 2017	-	4,528	-	68	838	-
January 2018	-	6,431	-	120	1,392	-
February 2018	-	3,642	-	191	1,213	-
1 - 17 March 2018	-	1,746	-	59	289	-
Total	-	50,201	-	1,691	11,373	-

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.

Brahma Binabakti Mill sell their product (CPO and PK) to the buyer directly. Whole transaction of CSPO/CSPK has been declared in RSPO IT Platform. There is no outsource agreement with palm kernel crusher facility.

Status: Comply

3.3. Conformity Checklist of Certificate and Logo Use *(Only apply for Surveillance Assessment Report)*

1.	Evidence of permission or approval certificate and logo from Certification Body which submitted by Client	X or√
ASA-3	The company doesn't use Logo.	
	Status: Comply	
2.	Implementation of certificate and logo used by Client comply with size and type (shape) against Guideline of Logo Use	X or√
ASA-3	The company doesn't use Logo.	
	Status: Comply	
3.	Implementation of Certificate and Logo is not used on product	X or√
ASA-3	The company doesn't use Logo.	
	Status: Comply	
4.	Controlling of Certificate and Logo, including withdrawing inappropriate logo.	X or√
ASA-3	The company doesn't use Logo.	
	Status: Comply	

3.4. Summary of RSPO Partial Certification.

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

PT Brahma Binabakti is explained in table 1.10. run one (1) mill and three (3) estates (own and smallholders) in Indonesia and has achieved RSPO certified for one (1) mill and one (1) supply base in Indonesia. PT Brahma Binabakti has informed the TBP progress, MUTU has considered that PT Brahma Binabakti is comply with the RSPO requirement for TBP. The Time Bound Plan was revised and declared by PT Brahma Binabakti on 21 March 2018 approved by Director.

MUTU has verified partial certification for un-certified unit's subsidiary of PT Brahma Binabakti based on their Time Bound Plan. There are two (2) uncertified management unit of PT Brahma Binabakti. MUTU Auditor verified positive assurance against the company internal audit and supporting evidence as well as any information from others sources.

MUTU Auditor has verified company partial certification and concludes that:

- There is no significant land conflicts which have not been declared above
- The company has follow RSPO requirement related to New Planting Procedure and Remediation and Compensation Procedure.
- There is no labour disputes that are not being resolved through an agreed process
- All plantations established since 2005 have been done so in accordance with the applicable laws of the country and that there is no evidence of non-compliance with law in any of the non-certified holdings which has not been declared above

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	Internal audit has not been done for plasma 1 & 2 locations. However, for plasma 3 (BBB Pемыayung) internal audit had been done. The latest internal audit result shows that this area still not ready for certification due to latest progress of HGU process (on-going cadasteral).
2.1.2	No replacement after dates defined in NIs Criterion 7.3 of: <ul style="list-style-type: none"> • Primary forest. • Any area identified as containing High Conservation Values (HCVs). • Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3. 	No new planting area replacing primary forest areas in accordance with principle 7.3 (after January 1, 2010) for plasma 1 and 2. For plasma 3 (BBB Pемыayung) the LUCA study has been conducted to calculate the potential loss of HCV area due to land clearance without prior HCV assessment. The LUCA's document of Plasma 3 (BBB Pемыayung) still under review by RSPO RaCP's Reviewer.
2.1.3	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	For plasma 1&2 location is not applicable for RSPO New Plantings Procedure due to its year planting. For plasma 3 (BBB Pемыayung) the LUCA study has been conducted to calculate the potential loss of HCV area due to land clearance without prior HCV assessment. The LUCA's document of Plasma 3 (BBB Pемыayung) still under review by RSPO RaCP's Reviewer.
2.1.4	Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	There is no conflicts or complaints from stakeholders regarding the operation of PT BBB's plasma 1-2-3

2.1.5	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	There are no disputes or complaints related to 1-2-3 Plasma employment
2.1.6	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	Plasma still exist forest area

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

No	Category	Clause	Std	Auditor	Description	Deadline of Corrective Action	Root Cause Investigation and Date*	Corrective Action & Evidence and Date*	Audit Team Review and Date
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
1	Obs	5.2.2	2	SSW	PT Brahma Binabakti have engaged in activities for the preservation of wildlife that exists in plantation area. However, companies need to standardize the checklist that is used for monitoring wildlife that includes a checklist on the presence or	Next Surveillance Audit	Checklist is available but not yet covered the types of hunting activities	- Make a checklist that covers the types of wildlife hunting activities - Provide training to PIC who will conduct monitoring	Open, the implementation will be checked in
2	Obs	4.4.1	2	PS	The Company has provide groundwater intake permits and water quality test results for seven (7) groundwater sources identified in the mill and estates, but for water resources in section E and A are still in the stage of identification to obtaining a permit.	Next Surveillance Audit	There is no available water source identification in Afdeling A and E, so no permit has been made yet	Coordinate with the "Pekerjaan Umum" office regarding the location of water sources in Afdeling A and E.	Open, the implementation will be checked in the next ASA
3	Major	4.7.3	2	AGT	Associated with the provision of PPE it is found a discrepancy that the specification on every PPE applicable to any type of work not match with the standard. By sampling it is found that apron in section H warehouse made from thin material and can not be sure the workers are protected from pesticide contamination.	17 May 2017	The Company already has technical guidelines for Personal Protective Equipment but not yet equipped with the standard of each type of PPE The existence of thin apron because there is no standardization of Personal Protective Equipment as reference in Apron purchase HIRA has not been fully	Create work instructions related to Standardization of Personal Protective Equipment at PT BBB Make purchases of apron in accordance with the specifications on work instructions Standardization Personal Protective Equipment at PT BBB Attach a completed HIRA Evidence: 1. Work Instruction related to	The corrective action has complied and adequate so that the finding can be closed

							identified	standardization of Personal Protective Equipment PT BBB 2. Purchase apron as per predefined standardization 3. HIRA Estate dan Mill	
4	Obs	4.7.5	2	AGT	The company has already conducted first aid training to estate foreman on July 26, 2016, but the trainer dr. Zukri Nasution has not been proven have followed training for first aid in the workplace.	Next Surveillance Audit	First aid training has not been conducted by Officers who have attended training on occupational safety and health (K3) in the field of first aid in workplace accidents	Company conducted first aid training for estate foreman by trainers who have attended the first stage of occupational safety and health (K3) training in workplace accidents	Open, Effectiveness of implementation will be seen in the next audit
5	Obs	5.3.3	2	AGT	Companies must ensure the domestic waste management is manage by regulations (PP 81/2012). During a visit to the office section H, domestic solid waste is still mixed between organic and non-organic.	Next Surveillance Audit	The company has provided organic and organic waste bins but the amount is not enough Employees still do not have a high awareness in waste sorting	the company conducted corective action i.e the company provide organic and inorganic waste bins. The company conducted socialization the separation of organic and inorganic waste to employees on a regularly.	Open, Effectiveness of implementation will be seen in the next audit
6	Major	4.6.11	2	AGT	Based on sprayers list and a list of employees which checked in 2016, there are sprayers that have not received the examination (cholinesterase) such as: Nely-Afdeling B, and Rasik-Afdeling G.	17 May 2017	the assistant and the foreman employing non-spray workers on behalf of Nely (Afdeling B) to do the spray work so that the employee had not received a cholinesterase examination. the Employee (Mr Rasik) is an employee appointed as a spray team one month after the implementation period of medical examination. Requirements to be a spray team if workers from another function are not yet available	<ul style="list-style-type: none"> • Made a policy to avoid employing employees (non spray) for spraying • The company conducted special medical examination (Cholinestraxe) for two spray officers on behalf of Mrs Nely Afdeling B and Mr Rasik Afdeling G Made requirement for operator pesticide The Company has established Internal Memo No. 02 / SUST-BBB / IV / 2017. The memo describes that the assistant avoid employing employees (non spray) for spraying and the medical examination	The corrective action has complied and adequate so that the finding can be closed

								(cholinesterase) requirement for the spray worker twice a year. Internal Memo is set since April 13, 2017. <ul style="list-style-type: none"> Internal memo has been socialized to every assistant on May 03, 2017 which is proven with attendance list. The company has conducted medical examination (cholinesterase) to employees behalf of Mrs Neli and Mr Rasik. requirement and structure operators pesticide	
7	Major	2.2	2	RB	There are planted area for 785 ha which planted in Forest Area (based on Forestry Minister Decree No. 727/2012). This is not in accordance with Government Regulation Number 104 of 2015	17 May 2017	Based on the letter of Bupati Batang Hari No. 525.26 / 4146 / Date dated September 1, 1994, Jo. Batang Hari Bupati's letter no. 525.26 / 5946 / Penda dated November 5, 1994 stated that it was given to planting an oil palm plantation covering an area of ± 25,000 Ha in the Area of Dry Cultivation, but in 2012 issued Minister of Forestry Decree No. RI. SK, 727 / Menhut-II / 2012 concerning the change of allotment of forest area to non forest area and change of function of forest area so that there is plant area which is in forest location. The request for a change of status has been made in	Coordinate with the Ministry of Living and Forestry related to the process of application for changes in the designated forest area. Any progress document activity will be reported Evidence: Progress of forest release of PT BBB area	The corrective action has complied and adequate so that the finding can be closed

							accordance with Government Regulation No. 104 of 2015, but it has not been completed yet because it will take a long time to change the status of the region.		
8	Major	7	2	SSW, PS, TSS	<p>PT. Brahma Binabakti already conduct studies of Land Use Change Analysis (LUCA) in August 2016. However there are still some things that have not been conform, ie: 1) From the verification of Land Use Change Analysis report and recapitulation of land clearing and re-stacking PT. Brahma Binabakti-Pemayung, can be known that there is different information about area that has been cleared. In LUCA report stated the company cleared area for 472,91 ha since 1 Januari 2010. But in the recapitulation of land clearing, the company cleared 588,27 ha.</p> <p>There is 115,36 ha of cleared area that not yet been identified in LUCA report.</p> <p>2) Based on site visit, verification on recapitulation of land clearing/re-stacking PT. Brahma Binabakti-Pemayung and Batanghari Regent Decision No. 147 of 2008 on the Location Permit PT. Kirana Sekernan obtained data and information that in the range of year 2008 to 2010,</p>	17 May 2017	<p>There is a discrepancy in the results of the LUCA study:</p> <p>1) Differences in data on the size of land in LUCA documents with data on clearing of land owned by the company, because the area of land clearing conducted under the control of PT Kirana Sekernan has not been calculated</p> <p>2) The inclusion of information regarding land clearing by PT Kirana Sekernan which is the responsibility of PT Brahma Binabakti for land clearing period from 2008-2010 because LUCA study was originally based on land clearing map owned by PT BBB Pemayung</p> <p>3) PT. Brahma Binabakti has no plans for new plantings in the Pemayung area</p> <p>4) PT Brahma Binabakti has not sent a disclosure of land clearing conducted without HCV assessment to RSPO</p>	<p>1) Revised the LUCA report by including land clearing conducted in the period 2008 to 2010 so that the difference of planting area of 115.36 ha has been included in the scope of LUCA</p> <p>2) Data on land clearing conducted in the period 2008-2010 has been traced by the Consultant using Landsat Image and incorporated into the LUCA Report PT BBB Pemayung</p> <p>3) The Company has compiled a timeplan of compliance with the LUCA Review and submitted it to the RSPO Compensation Panel, as the NPP process on the embedded land is not required (evidence of communication with the RSPO compensation panel has been sent via email)</p> <p>4) The Company has sent a liability disclosure template to the RSPO Compensation Panel as a condition in fulfilling the LUCA review process</p> <p>5) The Company has submitted documentary evidence of the commencement date and</p>	The corrective action has complied and adequate so that the finding can be closed

				<p>there were clearings (LC) in the area of the location permit. However, information on the amount of land cleared in that range of years was not mentioned in the Land Use Changes Analysis report. 3) PT. Binabakti Brahma is a member of TAP Group, where TAP has been a member of the RSPO in 2007, under the provisions of NPP item 1.3 mentioned that land clearing after 1 Jan 2010 is subjected to NPP requirement. 4) PT Brahma Binabakti had not submit Disclosure regarding clearings without HCV Assessmen to RSPO (RaCP related to LC without prior HCV Assessment item 3.3.1) 5) The Company not able to show the data that provides information about starting and completion dates of clearing (LC) for Pemayung estate</p> <p>6) There are monitoring reports on RKL RPL second half of 2016 for the activities of oil palm plantations in the Pemayung district, Batang regency. However, the report does not already include environmental monitoring results as aspects of air quality, surface water quality, groundwater quality, and so on. 7) Groundwater intake at the site of Pemayung 1 and 2 are still in the process of obtaining a license from relevant agencies.</p>	<p>because the company assumes PT BBB Pemayung is a plasma plantation of PT Brahma Binabakti, thus entering GA13-6g RSPO Resolution on "Resolution to Review and Amendment Of The Updated NPP Process As Applied To Smallholders ", so that the entire NPP process including the LUCA is postponed first until there is further review of the resolution</p> <p>5) The Company has not been able to provide data starting and completion of land clearing for the Pemayung estate because the documentation / archives of land clearing have been stored and archived in Jakarta</p> <p>6) No identification of parameters for the overall environmental test and PT BBB-Pemayung environmental monitoring time plan has been carried out</p> <p>7) There is no identification of groundwater retrieval at the location of Pemayung 1st and 2nd and there is no time plan for obtaining permits from the relevant agencies</p>	<p>completion of the land clearing to CB</p> <p>6) Conduct environmental testing in accordance with RKL-RPL documents in BBB Pemayung;</p> <p>7) Identify and manage groundwater utilization permit and make time plan of permit arrangement</p> <p>8) Conducting LB3 TPS permission and time plan for completion of LB3 TPS permit</p>
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					8) It is uncertain hazardous waste produced in the Pemayang estate 1 and 2 are stored and managed in accordance with the requirements in the permit No. 04/ Kep.Ka.BPTSP / III / 2015 held.		8) Available TPS B3 waste in Pemayang, but the permit has not been obtained and not yet available time plan completion permit TPS LB3		
9	Obs	1.1.1	2	TSS	In SOP / SUPP / II / 2017/001 dated February 20, 2017 Revision 02 related Reception and Handling of Requests for Information have set the frequency of updating the list of stakeholders conducted every 6 months. Companies should make provisions related to complaints submitted by stakeholders emailed to the company.	Next Surveillance Audit	There is no provision concerning the complaint submitted by stakeholders to companies sent via company email	Revise the SOP by entering the complaint mechanism clause via e-mail	Open, the implementation will be checked in the next ASA
10	Major	6.2.1	2	TSS	Companies own SOP reception and handling of complaints (Doc No. 106 899 / TAP / PRO-CSR-HO / XI / 16). Found discrepancy ie: 1) SOP is not yet set up a mechanism where workers make a complaint or a complaint to another supervisor or senior. 2) SOP is not set on socialization and complaints that are confidential and how to protect against the relevant person. 3) SOP is not set up a complaint to the RSPO Complaint system, if the problem can not be resolved by the two parties.	17 May 2017	1. SOP Employee Complaints No. SOP / SUPP / XT / 2016/009 is available. In the SOP has been set complaint submission can be done through 3 mechanisms: 1. Through direct superior 2. Through the Feedback Box 3. Through Bipartit. However SOP has not been referring to what is required in the general checklist of P & C RSPO 2013 which is the delivery of complaint directly to another superior or above it. 2. SOP Employee Complaints No. SOP / SUPP	1. Revise the mechanism of direct complaint submission to superiors and / or other supervisors 2. Setting up important phone numbers disite for the delivery of information 3. Adding clauses related to the delivery mechanism to the RSPO complaint system Evidence: 1. SOP Employee Complaints No. SOP / SUPP / xt / 2016/009 2. Memo No.124027ITAP / MI N-HRD-HO / IV / 1 7 3. Work Instruction Mechanisms Submission of external and internal stakeholder complaints to the RSPO Complain Panel 4. Minutes of complaints related to the	The corrective action has complied and adequate so that the finding can be closed

						<p>/ xt / 2016/009 has covered about maintaining confidentiality and protection against complainants. This SOP is revised from the previous SOP NO. TAP-PR / HRD-GN / 063-0113-0. Date 18 January 2013. which in Audit surveillance PT. The first BBB has become an audit finding on 29 February - 04 March 2016. In the new SOP the point of maintaining confidentiality has been included in the Flow of the Submission of Stage 1 Employee Complaints at Point 6</p> <p>3. SOP Employee Complaints are available No.SOP / SUPP / xt / 2016/009. In the SOP has been set complaint submission can be done through 3 mechanisms: 1. Through direct superior 2. Through the Feedback Box 3. Through LKS Bipartit However SOP has not been referring to what is required in the general checklist of P & C RSPO 2013 which is about complaint to RSPO Complaint System when problems can not be solved</p>	<p>complaint panel complaints panel RSPO</p>	
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							by both parties		
11	Major	6.9.1	2	TSS	<p>The company already has policies relating to sexual harassment (sexual abuse) that have been listed in the company regulations. Found discrepancy ie: 1) There was no evidence of training on gender and all workers' committees related to sexual harassment. During an interview for sprayers group which all of they are women, they have no understanding related to the sexual abuse, 2) Not found training materials related to sexual harassment</p> <p>3) No contacts that found can be reach of and ensure it confidentiality. During the interview, the workers are not aware about this provisions</p>	17 May 2017	<p>1.PT. Brahma Binabakti does not yet have policies and programs to engage in socialization related to sexual harassment to workers. 2. The Gender Committee Executive has no knowledge / understanding on aspects of sexual harassment. Gender committees do not yet have competencies related to aspects of sexual harassment. No adequate training material on sexual harassment is available and there is no requirement of competency as a member of the gender committee 3. For procedural / technical guidelines for reporting gender inequality has been made available, but it does not include personal contacts that can be contacted in the guidelines.</p>	<p>1. Making memos related to the implementation of socialization of sexual harassment, to be more scheduled in the implementation of its socialization. Conduct socialization on gender committees and all workers related to sexual harassment as well as make socialization programs Sexual harassment to employees 2. a. Provide training materials and training exercises from competent parties to gender committee members 2. b. Make requirements as a member of the gender committee and conduct a Trainer of Training (TOT) to workers from previous Gender Committee members who have been trained 3. Provide personal contacts that can be contacted</p> <p>Evidence: 1. Memo socialization of sexual harassment and requirement to be member of gender committee 2. Minutes of training implementation to gender committees and workers from the police and the Manpower Office 3. News of training events to all employees in each afdeling 4. Training materials from police related to sexual harassment 5. Training materials from Disnaker 6. Personal contacts that can</p>	<p>The corrective action has complied and adequate so that the finding can be closed</p>

								be contacted in the event of sexual harassment	
12	Major	-	RSP O Certi catio n Syste m: Time bound plan	SSW	PT Brahma Binabakti has made time-bound plan for certification of plasma from the year 2018 to 2020. In this year (2017) it already contained the socialization of the RSPO certification process to plasma 1. However, time-bound plan should be ensured completed with a period of 3 years after the PT. Brahma Binabakti certified so that a time-bound plan that has been made insufficient.	17 May 2017	Time bound already available but not covering the whole plasma (made partially)	Review and revise plasma timebound of PT Brahma Binabakti Evidence: 1. Time line plasma certification	The corrective action has complied and adequate so that the finding can be closed

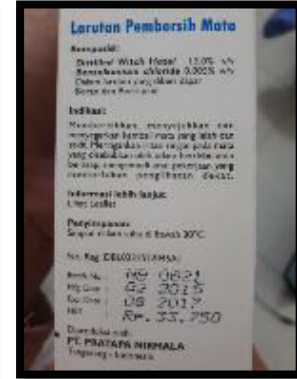
3.5.2 Identification of Findings, Corrective Actions and Observations at ASA-3

NCR No.	: 2018.1	Issued by	: Andi Pratama Pasaribu
Date Issued	: 23 March 2018	Time Limit	: ASA-4
NC Grade	: Minor	Date of Closing	:
Standard Ref. & Requirement	: 2.2.2. Legal boundaries are demonstrated clearly and maintained.		
Non-Conformance Description & Evidence observed <i>(filled by auditor):</i>			
<p>The legal territory has not been clearly demarcated. Based on field visit and legal boundary observation in Block C10 Afdeling C, C15 and F7 Afdeling Afdeling G found that boundary poles located in the middle of planting area that stated as Production Forest/Conversion Production Forest. However, there is insufficient evidence that the company already has a convincing and well-implemented mechanism for separating certified and non-certified products.</p>			
Root Cause Analysis <i>(filled by organization audited):</i>			
Correction <i>(filled by organization audited):</i>			
Corrective Action <i>(filled by organization audited):</i>			
Assessor Evaluation and Conclusion <i>(filled by auditor):</i>			
Verified by	:		

NCR No.	: 2018.2	Issued by	: Brigitta Prita
Date Issued	: 23 March 2018	Time Limit	: ASA-4 RSPO
NC Grade	: Minor	Date of Closing	:
Standard Ref. & Requirement	: 4.7.5 A procedure for emergency and work accident shall be available in Indonesian language and the workers, who have attended first aids training are available in the working areas.		
Non-Conformance Description & Evidence observed <i>(filled by auditor):</i>			
<p>Emergency and occupational accident procedures have not been implemented properly. First Aid Kit. Based on the results of field observations on operational activities, the auditor passed the verification related to First</p>			

Aid Box and found the fact that:

- Manual Circle in Block C12 Afdeling C, found flashlight not working, monitoring usage has not been updated. The results of monitoring in February 2018 show condition of first aid box and complete item.
- Circle Path spray in Block B1 Afdeling B, found exposed eye washers and alcohol solutions have expired, rusty pin, flashlight not working, and monitoring the use has not been updated. The results of monitoring in February 2018 show condition of first aid box and complete item.
- Fertilizer in Block D10 Afdeling E, found one of the items has expired, and monitoring of usage has not been updated yet. Monitoring results In February 2018 showed the condition of first aid boxes and complete items.
- Warehouse, there is an addition item that is ointment burns and already expired in December 2017. But the CH can not show the basic of addition of the item in writing by a competent officer.
- Guest house, found expired eyewash solution, safety pins and flashlight does not exist. The results of monitoring in February 2018 show condition of first aid box and complete item.



Based on the above, known that the company has not been able to ensure the first aid box in the field has met the requirements.

Emergency response

The results of the field visit was also known that the supervisor of the harvest has been equipped with First Aid box, it is also found the First Aid box in the mill office, some of them are in stations and workshops. Based on the interview with the supervisor known that the supervisor had understood about first aid in case of occupational accidents in the field. He was explaining related to work accident record and its review by OHS guiding Committee. However, simulation results of fire emergency response in factory area (engine room station and press station) with hydrant known that the hose is in leak condition. The company in this case has not been able to show an effective monitoring system.

Root Cause Analysis (filled by organization audited):

22 March 2018

Lack of employee understanding of the contents of first aid kit.

Correction (filled by organization audited):

22 March 2018

Conducting training to warehouse employees related to the contents of first aid kit.

Corrective Action (filled by organization audited):

22 March 2018

Perform routine checks on the conformity of the contents of the first aid kit.

Assessor Evaluation and Conclusion (filled by auditor):

23 March 2018

The company sent evidence of improvement in the form of socialization documentation to the warehouse employees related to the contents of the first aid box, but not enough evidence is shown that the company has a good system for monitoring the contents of first aid kit. Based on that fact, this non-conformity still open.

Verified by	: Brigitta Prita
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NCR No.	: 2018.3	Issued by	: Brigitta Prita
Date Issued	: 23 March 2018.	Time Limit	: 22 May 2018.
NC Grade	: Major	Date of Closing	: 1 May 2018
Standard Ref. & Requiremen	: 5.3.2. There Shall be evidence that all chemicals and their empty containers are disposed of responsible.		

Non-Conformance Description & Evidence observed *(filled by auditor):*

There are no evidence that all chemicals and their empty container are disposed of responsible. Based on document review, the company hasn't policy or system to regulated related ban of hazardous waste used (packaging of pesticide and packaging of paint) as to water container. Based on field visit to Housing in Afdeling E BBB Estate its known workers used pesticide packaging to water container.



Beside that, based on field visit to BBB Mill its known oil packaging not yet managed properly with guidance technique hazardous waste with document number PT/SUPP/I/2018/026.



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

March 22nd, 2018.

Insufficient of water container in employee's home and lack of knowledge regarding to chemical containers risk.

Correction *(filled by organization audited):*

Withdraw all hazardous waste contaminated packaging for other types of activities.

Corrective Action *(filled by organization audited):*

Verification March 22nd, 2018.

The company shows the demand documents for 200 liters of plastic drum as much as 238 drums dated March 22nd, 2018 with details:

- a. Afdeling A as many as 35 pieces.
- b. Afdeling B as many as 50 pieces.
- c. Afdeling C as many as 51 pieces.
- d. Afdeling E as many as 55 pieces.
- e. Afdeling F as many as 26 pieces.
- f. Afdeling H as many as 21 pieces.

Verification April 17, 2018.

1. Make rules or memos for the prohibition of using hazardous material contaminated packaging for other types of activities.
2. Communicate to all employees not to use hazardous material for other types of activities.
3. Withdraw all hazardous material contaminated containers used by employees.
4. Replace the previous resin container using hazardous waste packaging.

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

Verification, March 23rd 2018.

The Company has not shown any evidence of hazardous waste identification used for water containers in each Afdeling housing, there is no evidence of hazardous waste withdrawal and evidence of socialization to the workers concerning the dangers of using chemical contaminated containers as water container. So this is not fulfilled.

Verification, April 23rd 2018.

The Company has shown additional improvement evidence in the form of:

- Memo Managing Director Upstream and Managing Director Trading & Downstream No. 008 / MU-DIR / III / 2018 dated March 28, 2018 regarding the Prohibition on the Use of hazardous waste Contaminated Package.

- Evidence of socialization / training of the ban on the use of hazardous waste contaminated containers on 26 - 27 March 2018 in all estate units and general affair.
- Evidence of socialization / training of the ban on the use of hazardous waste contaminated containers on 18 April 2018 to Mill workers.
- Documentation of hazardous contaminated withdrawal at boiler stations.
- Withdrawal of hazardous contaminated containers and the minutes of submission of 40 new water drum units for workers in Afdeling F on April 18th, 2018.
- The attendance list of delivery of drum clean water and withdrawal of hazardous material contaminated containers for workers in Afdeling E on April 20th, 2018.

Verification May 1st, 2018.

Additional evidence of improvement has been shown:

1. Minutes of meeting on the delivery of contaminated packaging of Hazardous Toxic Material to the Storage Station Warehouse Between Waste Hazardous and toxic materials on 23 April 2018 of 63 kg of contaminated packaging. News of this event is known by the manager and storage staff.
2. Examples of housing inspection documents.
3. Document inspection OHS & Environment and Housekeeping in housing PT. Brahma Binabakti. Based on the documents obtained information that the company set an inspection schedule will be done regularly 2 months. The facilities & infrastructure that became the object of inspection are offices, warehouses, workshops, polyclinics, afdeling housing, generator houses.

Auditor's conclusion May 1st, 2018.

Based on the evidence of improvements that have been shown, this nonconformance is stated Closed with Observation. The effectiveness of the improvement evidence is shown to be the part that will be further verified on the next assessment activity (ASA-4).

Verified by	:	Brigitta Prita & Andi Pratama Pasaribu.
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NCR No.	:	2018.4	Issued by	:	Brigitta Prita
Date Issued	:	23 March 2018	Time Limit	:	ASA-4
NC Grade	:	Minor	Date of Closing	:	
Standard Ref. & Requirement	:	5.3.3 A documented waste management plan to avoid or reduce pollution and its implementation shall be available.			
<p>Non-Conformance Description & Evidence observed (filled by auditor):</p> <p>Not all waste is well managed. The company has showed management domestic waste in site Procedure (Estate & Mill) No. SOP/SUPP/VIII/2015/001 its stated domestic waste must grouped, trown away in garbage, and transported to landfill ever 3 days. But based on observation visit and interview with resident Afdeling E its known there is an improper waste disposal.</p>					
<p>Root Cause Analysis (filled by organization audited):</p>					

Correction <i>(filled by organization audited):</i>	
Corrective Action <i>(filled by organization audited):</i>	
Assessor Evaluation and Conclusion <i>(filled by auditor):</i>	
Verified by	:

NCR No.	: 2018.5	Issued by	: Andi Pratama Pasaribu
Date Issued	: 23 March 2018	Time Limit	: 22 May 2018
NC Grade	: Major	Date of Closing	: 7 May 2018
Standard Ref. & Requirement	: General Chain of Custody 5.3.1 The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified.		
Non-Conformance Description & Evidence observed <i>(filled by auditor):</i>			
<p>Supply Chain Procedures Not Accommodating Separation of Products Derived from land use title and Non-Land use title Estates.</p> <p>Facility has had supply chain procedure that divided into:</p> <ol style="list-style-type: none"> 1. SOP of Calculation and Recording of certified FFB, CSPO & CSPK in Mass Balance Modul. 2. SOP of traceability of FFB, CPO & PK in Mass Balance Modul. <p>Those procedure explained that FFB from own estate claimed as certified product and FFB from associated smallholder/outgrower claimed as non-certified product. However, Based on field visit and legal boundary observation in Block C10 Afdeling C, C15 and F7 Afdeling Afdeling G found that boundary poles located in the middle of planting area that stated as Production Forest/Conversion Production Forest. In addition, the results of interviews with weighbridge operator obtained information that all the FFB delivery note from the own estate were stamped "certified". However, the FFB receiving system and procedure at weight stations has not yet accommodated the separation of FFB from own estate with HGU and non HGU status.</p>			
Root Cause Analysis <i>(filled by organization audited):</i>			
Separation mechanism of FFB from HGU or non HGU area still not available yet.			
Correction <i>(filled by organization audited):</i>			
Providing clear and visibly legal boundary to separate FFB from HGU or non HGU area.			
Corrective Action <i>(filled by organization audited):</i>			

1. Providing separation mechanism of FFB from HGU or non HGU area
2. Conducted training and socialization to harvesting supervisor and field assistant regarding to FFB separation from HGU or non HGU area.
3. Conducted training and socialization regarding to administration of FFB separation for weighbridge operators.

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

Verification 23 April 2018

The company has shown several corrective evidence as follows:

1. Work instruction in non certified area (No. 01/BBB/III/2018) stipulated by Senior Estate Manager and Senior Mill Manager on 22 March 2018.
2. Socialization of work instruction above on 12 April 2018. But, there was no attendance list showed.
3. FFB separation training in mill on 11 April 2018 for logistic staff and weighbridge operators.
4. Minutes of meeting boundary marking (palm tree) on 5 April 2018.
5. Sample of FFB delivery note on 12 April 2018 for FFB from block O52 – O54 block C that showed the FFB separation.
6. Sample of weighbridge ticket on 12 April 2018 for FFB from block O52 – O54 block C that showed the FFB separation that has been proportioned in daily record of FFB production from certified or non certified area.

However, the company has not show the certified and non certified map and any other evidence such as weighbridge systems.

Auditor Conclusion on 23 April 2018

Based on corrective evidence above, this non conformance still open.

Verification 7 May 2018

The company has demonstrated separation mechanism during auditor and auditee meeting on 7 May 2018. The demonstration covering separation mechanism started from FFB harvesting, counting in collection spot, FFB delivery note, weighbridge and proportioned in daily record of FFB production from certified or non certified area by logistic staff under mill manager supervision as supply chain controller.

Auditor Conclusion 7 May 2018

Based on corrective evidence showed, this non conformity has **Closed with Observation**. Effectivity of the mechanism will be verify on the next assesment.

Verified by : **Andi Pratama Pasaribu**

NCR No.	: 2018.6	Issued by	: Andi Pratama Pasaribu
Date Issued	: 23 March 2018	Time Limit	: ASA-4
NC Grade	: Minor	Date of Closing	:

Standard Ref. & Requirement	: RSPO Certification System Clause 4.2.3. The unit of certification shall be the mill and its supply base: All the FFB from the directly managed lands (or estates) shall be produced to certifiable standards. The mill will develop and implement a plan to ensure that 100% of associated smallholders and outgrowers are of certifiable standard within 3 years.
Non-Conformance Description & Evidence observed <i>(filled by auditor):</i>	
<p>Not all associated smallholder has implemented RSPO standard</p> <p>Based on document verification and interview with related stakeholder obtained information that the company has had partnership contract with village cooperative unit (KUD) Akso Dano (for Plasma 1 & 2) and KUD Dano Bangko which is categorized as associated smallholder. The results of interviews with management of KUD and FFB received reports in mill are known that the associated smallholders consistently supply FFB to the mill. Until ASA-3 audit, there is no evidence that all associated smallholder have implemented RSPO standard.</p>	
Root Cause Analysis <i>(filled by organization audited):</i>	
Correction <i>(filled by organization audited):</i>	
Corrective Action <i>(filled by organization audited):</i>	
Assessor Evaluation and Conclusion <i>(filled by auditor):</i>	
Verified by	:

3.5.3 Opportunity for Improvement

No	Ref. Std.	Description
1.	1.1.1	The company to be consider to send reports to the relevant agency with the specified time limit.
2.	4.7.3	The Company have the opportunity to follow up the process of licensing OHS operator renewal for the Mill area.
3.	6.1.3	Actually the Certificate Holders has document of Social Impact Management and Monitoring with the annually time frame. However the Company to be consider to create a specific time frame of Social Impact Management and Monitoring Plan.

4.5.4 Noteworthy Positive Components

No	Descriptions
1	Management commitment to implement sustainable palm oil development.
2	Personal competence in the implementation of sustainable palm oil principles.
3	Blue PROPER for 2016-2017 period.
4	Corporate Waste Utilization award at Muaro Jambi in 2017.
5	Continuous annual improvement programmed Quality Control Circle (QCC).
6	Use of Electronic Bunch Count Chit (EBCC) application in android for daily FFB input data and Mobile Estate application to check field and verification of daily FFB input data.

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

Public Issues (Institution/ NGO/Community)	Auditor Responses
<p>National Land Agency of Muaro Jambi District Monday, 19 March 2018</p> <ol style="list-style-type: none"> The company has own land legality of their own operational area. There is no land conflict regarding to PT. Brahma Binabakti that handled by National Land Agency of Muaro Jambi District now. The company has reported their annual land use to the National Land Agency of Muaro Jambi District. 	<p>It has been accordance with criterion 2.2 and 2.3.</p>
<p>Plantation Agency, Muaro Jambi District</p> <ul style="list-style-type: none"> <i>Penilaian Usaha Perkebunan (PUP)</i> will be done in early April 2018, currently still using the previous PUP. There are no negative issues such as landfires, conflicts / disputes with local communities and other business interruptions The company has a CSR program with the local government as well as the surrounding village. The Company regularly reports regular reporting Plantation such as Business Progress Report. 	<p>It has been verified in accordance Criterion 1.1, 2.2, 2.3, 4.1, 5.2, 5.5, 6.2, 6.3, 6.8, 6.10 and 6.11.</p>
<p>Environmental Agency District of Muaro Jambi.</p> <p>Based on interview, it's known that The company has submitted mandatory reports such as liquid waste every 3 months, hazardous waste, RKL/RPL reports every 6 months and HCV reports.</p> <p>The company has EIA documents and until now, there isn't any change in that report. Land application and hazardous waste temporary storage permit still valid. During now, there aren't issues related environmental pollution and every information has been responded by the company.</p>	<p>It has been in accordance with Criterion 1.1; 5.1 and 5.3.</p>
<p>Man Power and Transmigration Agency of Muaro Jambi District.</p> <ul style="list-style-type: none"> There are no industrial conflict between company and workers during last year. Company has sent compulsory reports on a regular basis such as guiding committee of occupational safety & health reports, work accidents reports, labor report and contract worker records. The Company has implement Governor Decree No. 1224/Kep.GUB/DISNAKERS/2017 dated 31 October 2017. There are two workers union: SPSI and IPB3, both of them has registered at Man Power Agency. 	<p>It has comply with criterion 6.2; 6.3; 6.4; 6.6; 6.7; 6.8; 6.9 and 6.12.</p>

Public Issues (Institution/ NGO/Community)	Auditor Responses
<ul style="list-style-type: none"> The structure of guiding committee of occupational safety & health for mill & estate has signed by Man Power Agency of Jambi Province. There has been no issue or report on child labor and workers discrimination. 	
<p>Village Representatives of Bukit Baling and Suko Awın Jaya Village Tuesday 20th and Thursday 22nd 2018</p> <ol style="list-style-type: none"> The company has had a good relationship with villager near the operational area. Whole land dispute cases has been resolved since 2015. The company has given CSR program since their operational started. All member of KUD Akso Dano very pleased with 	<p>Whole information has confirmed and written in criterion 2.2; 2.3, 6.1 and etc.</p>
<p>Public consultation with cooperative management of KUD Akso Dano. Tuesday, 20th 2018</p> <ul style="list-style-type: none"> The company had a good relationship with the cooperative institution since the agreement has signed. The company has provided job and strives opportunity to the villagers. During the cooperation was initiated, all FFB payment has been transparent and on scheduled. 	<p>Whole information has confirmed and written in criterion 6.10.</p>
<p>Committee Gender.</p> <p>Gender committees have been established since 2016. The organizational structure of gender committees is divided into 4 areas such as Empowerment, Services, Research & Development and Finance.</p> <p>The reporting mechanism can be through a gender committee. In addition, there has been no reporting related to sexual harassment.</p> <p>Socialization of the policy of handling sexual harassment has been submitted to workers and has been listed in the gender committee programs. Employees are also given menstruation leave (for 2 days) and maternity leave to work (3 months).</p>	<p>It has been in accordance with criterion 6.9.</p>
<p>Labor Union (IPB3) and Mill Labor Union.</p> <p>Labor union have been registered to the Manpower Office of Muaro Jambi Regency since 2011. During now the members among to 418 workers. Internal and Bipartite meetings are held once every 1 month is discuss about production services, wage</p>	<p>It has been accordance with criterion 6.6.</p>

Public Issues (Institution/ NGO/Community)	Auditor Responses
<p>increases in 2018, and others. CLA is still valid for the period 2016-2018.</p> <p>There are 5 ways to reports complaint for workers such as by manager, Suggestion Box, Email, Labor union organizations, and SMS.</p> <p>Based on the information obtained, the Labor unions complained about the determination of the wage scale of working period.it is known that the payment of wages for the working period of 1 or 2 years is same with the workers who join the company until 10 years.</p>	<p>The company has been showed the memo related determination of the wages scale and it's valid in 2018.</p>
<p>Local contractor and FFB suppliers.</p> <p>Local contractor comes from Suko Awin Jaya Village Cooperated since 2004 until now. Agreement is held by each party (company & contractor). Based on the agreement, PPE and Insurance health & social (BPJS) are borne by Local Contractor. Number of workers are 20 people and has received insurance (BPJS). Local contractors have also been trained related to aspects of OHS, transporting & harvesting of FFB, PPE and others.</p> <p>Payments are made in a timely manner by the company. The contractor gave the bill and the next day it was immediately paid to the local contractor. The pricing of FFB follows the price of the Plantation Agency and is known to the Contractor, Farmers and related parties (for the public).</p>	<p>It has been accordance with criterion 6.10.</p>

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY		
4.1	Formal Sign-off of Assessment Findings		
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <table border="0" data-bbox="399 851 1356 1254"><tr><td data-bbox="399 851 766 1254"><p>PT BRAHMA BINA BAKTI Director</p><p>George Oetomo Monday, 7 May 2018</p></td><td data-bbox="766 851 1356 1254"><p>PT MUTUAGUNG LESTARI Lead Auditor</p><p>Andi Pratama Pasaribu Monday, 7 May 2018</p></td></tr></table>	<p>PT BRAHMA BINA BAKTI Director</p>  <p>George Oetomo Monday, 7 May 2018</p>	<p>PT MUTUAGUNG LESTARI Lead Auditor</p>  <p>Andi Pratama Pasaribu Monday, 7 May 2018</p>
<p>PT BRAHMA BINA BAKTI Director</p>  <p>George Oetomo Monday, 7 May 2018</p>	<p>PT MUTUAGUNG LESTARI Lead Auditor</p>  <p>Andi Pratama Pasaribu Monday, 7 May 2018</p>		

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

No	Institution/NGO/Community	Address	Phone/Email	Form of Communication	Date of Contact	Response	
						Yes	No
1.	National Land Agency of Muaro Jambi District.	Muaro Jambi District, Jambi Province.	-	Interview	March 19 th , 2018.	√	-
2.	Plantation Agency of Muaro Jambi District.	Muaro Jambi District, Jambi Province.	-	Interview	March 19 th , 2018.	√	-
3.	Man Power and Transmigration Agency of Muaro Jambi District.	Muaro Jambi District, Jambi Province.	-	Interview	March 19 th , 2018.	√	-
4.	Environmental Agency of Muaro Jambi District.	Muaro Jambi District, Jambi Province.	-	Interview	March 19 th , 2018.	√	-
5.	Village Representatives of Bukit Baling and Suko Awin Jaya Village	Muaro Jambi District, Jambi Province.	-	Interview	March 20 th , 2018.	√	-
6.	Cooperative management of KUD Akso Dano.	Muaro Jambi District, Jambi Province.	-	Interview	March 20 th , 2018.	√	-
7.	Committee gender	Muaro Jambi District, Jambi Province.	-	Interview	March 21 st , 2018.	√	-
8.	Labor Union (IPB3) and Mill Labor Union	Muaro Jambi District, Jambi Province.	-	Interview	March 21 st , 2018.	√	-
9.	Local Contractor & FFB Supplier	Muaro Jambi District, Jambi Province.	-	Interview	March 21 st , 2018.	√	-
10.	Sawit Indonesia	Jakarta		Email	March 14 th , 2018	-	√
11.	Wahana Lingkungan Hidup	Jakarta		Email	March 14 th , 2018	-	√
12.	WWF	Jakarta		Email	March 14 th , 2018	-	√
13.	Stakeholders: <ul style="list-style-type: none"> • 1 staff Head of Industrial Relations and Social Insurance. • 1 GIS Assistance • 4 Field Assistance • 1 R&D Assistance • 1 Head of Finance • 1 Purchasing Assistance • 1 Chemical Mandore, 1 Manuring Mandore • 2 EFB application workers. 	Muaro Jambi District, Jambi Province.	-	Interview	March 20-22 nd 2018.	√	-

Appendix 2. Assessment Program

DATE	March 19 th – 23 rd 2018	
PROGRAM	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Mon, 19th March 2018		
05.20 – 08.35	Flight from Jakarta to Jambi	ALL TEAM MEMBER
09.00 – 11.00	Public Consultation to the Government Agencies in Muaro Jambi District	ALL TEAM MEMBER
12.00 – 14.00	Break	ALL TEAM MEMBER
14.00 – 15.00	Traveling from Muaro Jambi District to the site of PT. Brahma Bina Bakti	ALL TEAM MEMBER
15.00 – 16.00	Opening meeting (explanation of audit plan)	ALL TEAM MEMBER
16.00 – 17.00	Verification of previous assessment findings (if any), basic information, field visit etc.	ALL TEAM MEMBER
Tue, 20th March 2018		
08.00 – 12.00	Field visit to Brahma Bina Bakti Estate	ALL TEAM MEMBER
08.00 – 12.00	<ul style="list-style-type: none"> • Legal boundary, HCV management area, firefighting facilities 	TNB
08.00 – 12.00	<ul style="list-style-type: none"> • Manuring, Spraying, Harvesting, IPM, Workers safety 	YYT
08.00 – 12.00	<ul style="list-style-type: none"> • Workers facilities (housing, worship, health care, school, union, etc.) and Waste management (landfill, sanitary) 	BGA
	Public Consultation to Nearest Community	APP
12.00 – 14.00	Break	ALL TEAM MEMBER
14.00 – 15.00	Continues field observation (if needed)	ALL TEAM MEMBER
14.00 – 16.30	Completing checklist	ALL TEAM MEMBER
16.30 – 17.00	Verification of field visit and completing checklist	ALL TEAM MEMBER
Wed, 21st March 2018		
08.00 – 12.00	Field visit to Brahma Bina Bakti Estate	ALL TEAM MEMBER
08.00 – 12.00	<ul style="list-style-type: none"> • Legal boundary, HCV management area, firefighting facilities 	APP
08.00 – 12.00	<ul style="list-style-type: none"> • Manuring, Spraying, Harvesting, IPM, Workers safety 	YYT/TNB
08.00 – 12.00	<ul style="list-style-type: none"> • Workers facilities (housing, worship, health care, school, union, etc.) and Waste management (landfill, sanitary) 	BGA
12.00 – 14.00	Break	ALL TEAM MEMBER
14.00 – 15.00	Public Consultation with Internal Stakeholder	BGA
14.00 – 15.00	<ul style="list-style-type: none"> • Labour union 	BGA
14.00 – 15.00	<ul style="list-style-type: none"> • Gender committee 	BGA
14.00 – 16.30	Completing checklist	APP/TNB/YYT
16.30 – 17.00	Verification of field visit and completing checklist	ALL TEAM MEMBER
Thu, 22nd March 2018		

08.00 – 12.00	Field Observation to Brahma Bina Bakti Mill <ul style="list-style-type: none"> • SCCS, Mill Processing and OHS Implementation • POM waste management (hazardous, emission, pollution, POME application, etc.) and Water management • Stakeholder consultation to local contractor (Transporter FFB, CPO and PK) and others 	ALL TEAM MEMBER
08.00 – 12.00		APP/TNB/YYT
08.00 – 12.00		BGA
08.00 – 12.00		BGA
12.00 – 14.00	Break	ALL TEAM MEMBER
14.00 – 16.30	Completing checklist	ALL TEAM MEMBER
16.30 – 17.00	Verification of field visit and completing checklist	ALL TEAM MEMBER
Fri, 23rd March 2018		
08.00 – 10.00	Closing Meeting	ALL TEAM MEMBER
10.00 – 12.00	Traveling from Site – Jambi	ALL TEAM MEMBER
13.20 – 14.40	Traveling from Jambi – Jakarta	ALL TEAM MEMBER