

Roundtable on Sustainable Palm Oil Certification R S P O

[✓] Initial Certification

Name of Management Organisation : Pembangunan Raya Palm Oil Mill – PT. Agro Sejahtera Manunggal subsidiary of Bumitama Agri Ltd.
 Plantation Name : PT Agro Sejahtera Manunggal: Pembangunan Raya Estate, Belaban Raya Estate, Bengkuang Raya Estate, Cooperative Agro Seriam Mandiri
 Location : Village of Seriam, Sub District of Kendawangan, District of Ketapang, Province of Kalimantan Barat, Indonesia
 Certificate Code : **MUTU-RSPO/126**
 Date of Certificate Issue : 25 March 2019 Date of License Issue : 25 March 2019
 Date of Certificate Expiry : 24 March 2024 Date of License Expiry : 24 March 2020

Assessment	Assessment Date	PT Mutuagung Lestari Auditor	Reviewed by	Approved by
ST-2	03 to 07 September 2018	Moh Arif Yusni, Steve Mualim, M. Amarullah	Ganapathy Ramasamy	Octo HPN Nainggolan
NC Verifications	12 to 14 November 2018	Moh Arif Yusni		

Assessment	Approved by MUTUAGUNG LESTARI on:
ST-2	25 March 2019

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Figure 1. Location Map of PT Agro Sejahtera Manunggal

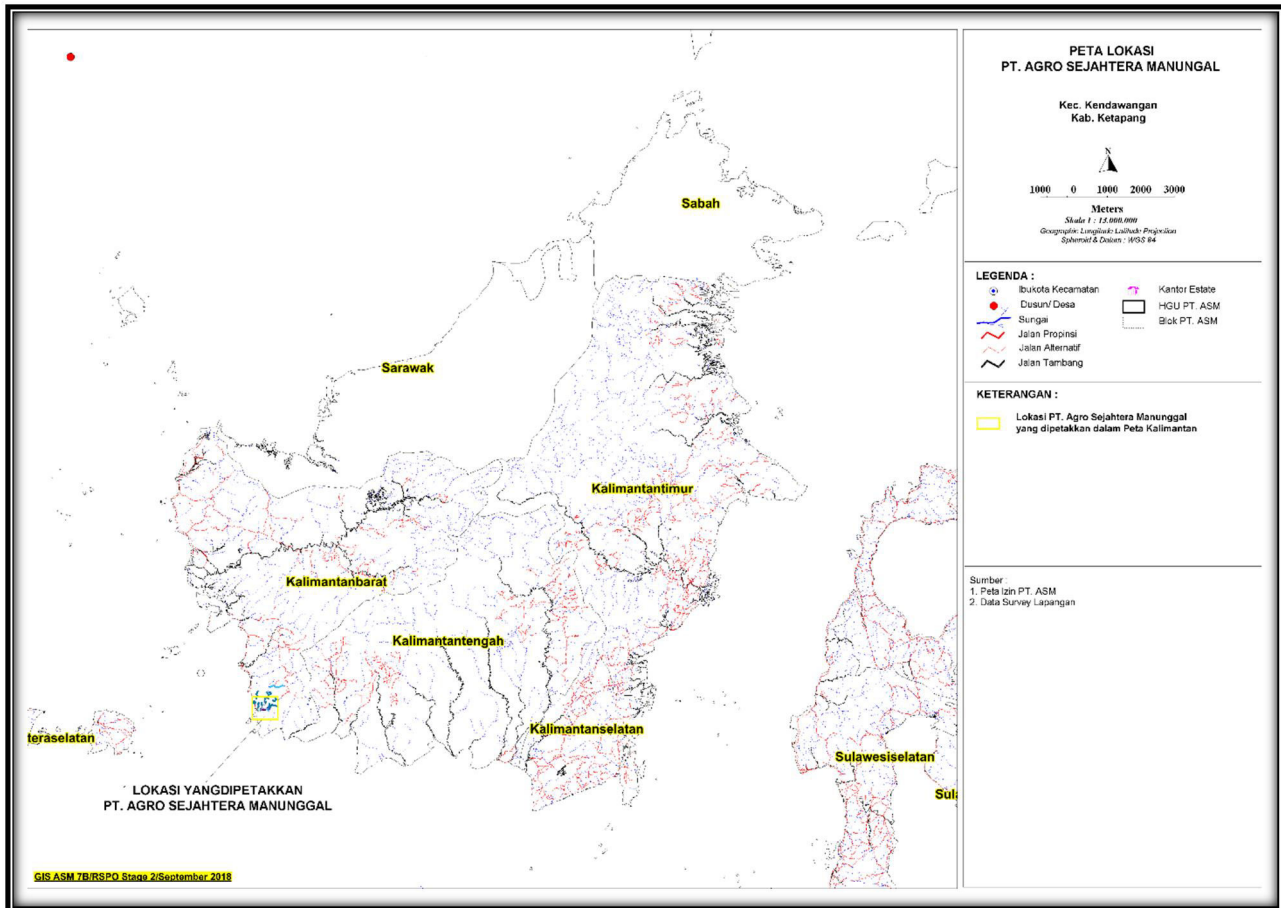
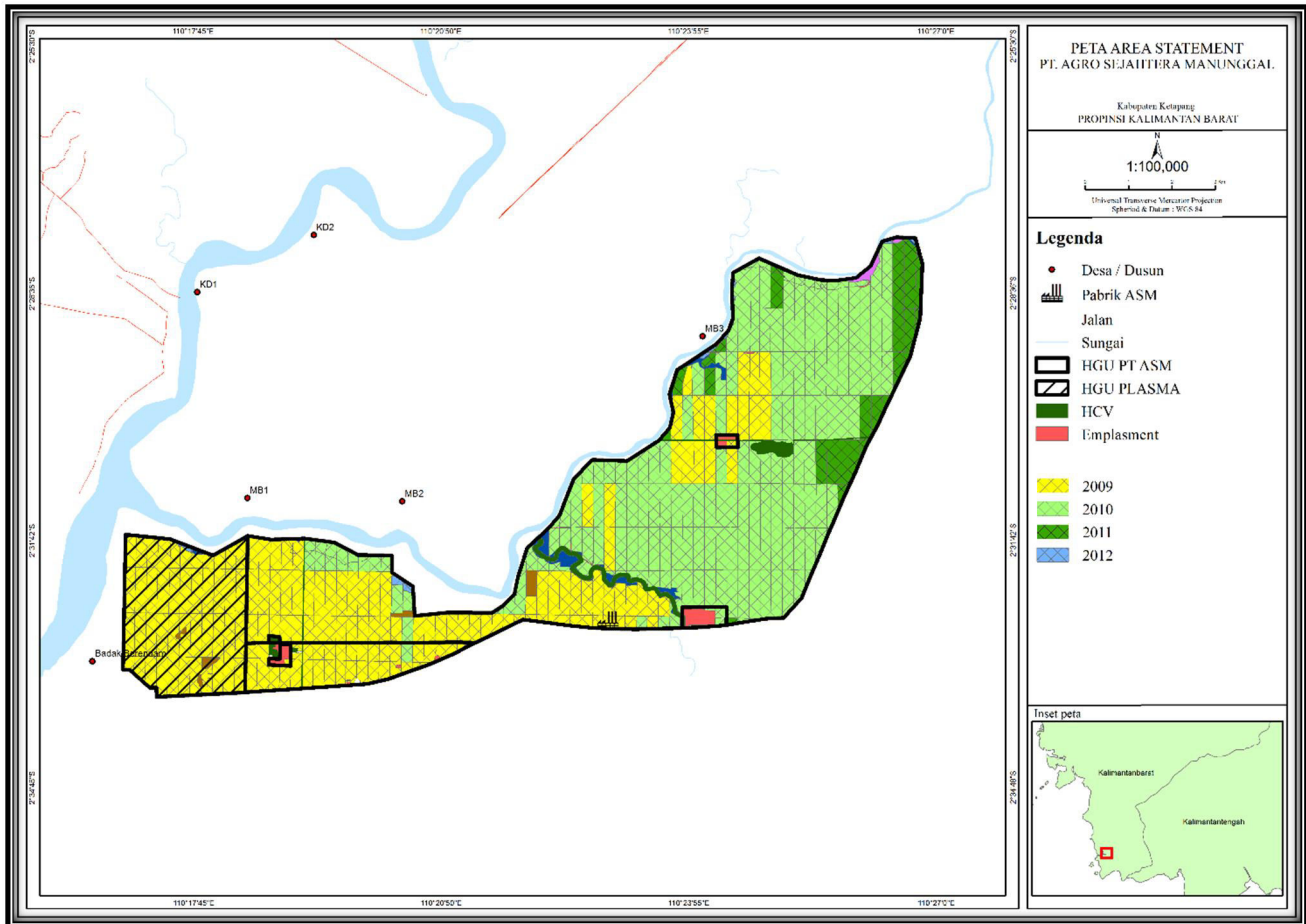


Figure 2. Operational Map of PT Agro Sejahtera Manunggal



Abbreviations Used

AMDAL	:	<i>Analisis Mengenai Dampak Lingkungan</i> (Environmental Impact Assessment)
APD / PPE	:	<i>Alat Pelindungan Diri</i> (Personal Protection Equipment)
APL	:	<i>Area Penggunaan Lain</i> (Other Land Used)
ASEAN	:	<i>Association of South East Asian Nations</i>
ASM	:	<i>Agro Sejahtera Manunggal</i>
BLH	:	<i>Badan Lingkungan Hidup</i> (Environment agency)
BLRE	:	<i>Belaban Raya Estate</i>
BRYE	:	<i>Bengkuang Raya Estate</i>
BOD	:	<i>Biological Oxygen Demand</i>
B3	:	<i>Bahan Beracun dan Berbahaya</i> (Hazardous Material Waste)
CBD	:	<i>Convention on Biodiversity</i>
CPO	:	<i>Crude Palm Oil</i>
CSR	:	<i>Corporate Sosial Responsibility</i>
FGD	:	<i>Focus Group Discussion</i>
FPIC	:	<i>Kesepakatan awal tanpa paksaan</i> (Free, Prior, Informed Consent)
GHG	:	<i>Gas Rumah Kaca</i> (Green House Gasses)
GRTT	:	<i>Ganti Rugi Tanam Tumbuh</i> (compensation)
HAM	:	<i>Hak Azasi Manusia</i> (Human Rights)
HCV	:	<i>Nilai Konservasi Tinggi</i> (High Conservation Value)
HCVF	:	<i>High Conservation Value Forest</i>
HGU	:	<i>Hak Guna Usaha</i> (Land Use Permit)
HSE	:	<i>Health, Safety and Enviroment</i>
IUP	:	<i>Izin Usaha Perkebunan</i> (Plantation Operation Licence)
IPAL	:	<i>Instalasi Penyaluran Air Limbah</i> (Installation of Waste Distribution)
JAMSOSTEK	:	<i>Jaminan Sosial Tenaga Kerja</i> (Social Assurance of Labor)
Jankos / EFB	:	<i>Janjangan Kosong</i> (Empty Fruit Bunch)
K3 / OHS	:	<i>Keselamatan dan Kesehatan Kerja</i> (Occupational Health and safety)
KER	:	<i>Kernel Extarction Rate</i>
KTP	:	<i>Kartu Tanda Penduduk</i> (Identity Cards)
LC	:	<i>Land Clearing</i>
LCC	:	<i>Legume Cover Crop</i>
LKS	:	<i>Lembar Ketidaksesuaian</i> (Nonconformity)
LPUP	:	<i>Plantation Report</i>
LTA	:	<i>Last Time Accident</i>
OER	:	<i>Oil Extraction Rate</i>
PAD	:	<i>Public Affair Department</i>
PHT / IPM	:	<i>Pengendalian Hama Terpadu</i> (Integrated Pest Management)
PBRE	:	<i>Pembangunan Raya Estate</i>
PK	:	<i>Palm Kernel</i>
PKS / POM	:	<i>Pabrik Kelapa Sawit</i> (Palm Oil Mill)
POME	:	<i>Palm Oil Mill Effluent</i>
PP	:	<i>Peraturan Pemerintah</i> (Regulation)
PTH	:	<i>Pegawai Tetap harian</i> (Daily Worker)
PTT	:	<i>Pegawai Tidak Tetap</i> (Casual Worker)
P2K3	:	<i>Panitia Pembina Keselamatan Kesehatan Kerja</i> (Occupational Health and Safety Guiding Committee)
P3K	:	<i>Pertolongan Pertama Pada Kecelakaan</i> (First aid)
RKL/RPL	:	<i>Rencana Kelola Lingkungan/ Rencana Pemantauan Lingkungan</i> (Environmental Management Plan/ Environment Monitoring Plan)

SCCS	:	Supply Chain Certification System
SIA	:	Sosial Impact Assessement
SK	:	<i>Surat Keputusan</i> (Decision Decree)
SOP	:	Standart Operating Procedure
SPK	:	<i>Surat Perjanjian Kerja</i> (Work Agreement)
ST-1	:	Stage – 1
ST-2	:	Stage-2
TBS / FFB	:	<i>Tandan Buah Segar</i> (Fresh Fruit Bunches)
TPS LB3	:	<i>Tempat penampungan sementara</i> (Temporary Hazardous Waste Storage)
TSS	:	Total Suspend Solid
UKL/UPL	:	<i>Upaya Kelola Lingkungan / Upaya Pemantauan Lingkungan</i> (Environmental Management Efforts/ Environmental Monitoring Efforts)

1.0	SCOPE of the CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used	<ul style="list-style-type: none">Indonesian National Interpretation of RSPO Principles and Criteria, July 2013 (endorsed by the RSPO Board of Governors meeting on 30th September 2016).RSPO Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014 revised on 14 June 2017 (Module D / E for CPO Mill)RSPO Certification System for Principles and Criteria, 14 June 2017	
1.2	Organisation Information		
1.2.1	Organisation name listed in the certificate	PT. Agro Sejahtera Manunggal subsidiary of Bumitama Agri Ltd.	
1.2.2	Contact person	Lim Sian Choo	
1.2.3	Organisation address and site address	<ul style="list-style-type: none">RSPO registered company: Jl. Melawai Raya No. 10, Kebayoran Baru, Jakarta Selatan, 12160Liaison Office: Village of Seriam, Sub District of Kendawangan, District of Ketapang, Province of Kalimantan Barat	
1.2.4	Telephone	(62-21) 72798418	
1.2.5	Fax	(62-21) 72798665	
1.2.6	E-mail	lim.sian.choo@bumitama.com	
1.2.7	Web page address	www.bumitama-agri.com	
1.2.8	Management Representative who completed the application for certification	Lim Sian Choo	
1.2.9	Registered as RSPO member	Bumitama Agri Ltd dated 07 October 2007 Reg.Number : 1-0043-07-000-00	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Palm Oil Mill and supply base: Pembangunan Raya Mill, Pembangunan Raya Estate, Belaban Raya Estate, Bengkuang Raya Estate and Cooperative Agro Seriam Mandiri	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			LatitudeLongitude
	Pembangunan Raya	Village of Seriam, Sub District of Kendawangan, District of Ketapang,	S 02° 32' 38"

		Province of Kalimantan Barat, Indonesia				
1.4.2	Location of Certification Scope of Supply Base					
	Name of Supply Base	Location	Coordinate			
			Latitude	Longitude		
	Pembangunan Raya	Village of Seriam, Sub District of Kendawangan, District of Ketapang, Province of Kalimantan Barat, Indonesia	S 02° 33' 13"	E 110° 18' 43"		
	Bengkuang Raya	Village of Seriam, Sub District of Kendawangan, District of Ketapang, Province of Kalimantan Barat, Indonesia	S 02° 32' 41"	E 110° 24' 12"		
	Belaban Raya	Village of Seriam, Sub District of Kendawangan, District of Ketapang, Province of Kalimantan Barat, Indonesia	S 02° 30' 29"	E 110° 24' 15"		
	Cooperative Agro Seriam Mandiri (660 members)	Village of Seriam, Sub District of Kendawangan, District of Ketapang, Province of Kalimantan Barat, Indonesia	S 02° 33' 13"	E 110° 18' 43"		
1.5	Description of Area Statement					
1.5.1	Tenure					
	• State		6,124.69 Ha			
	• Community		960.80 Ha			
	* total scope certification is 6316.77 Ha. There is area covering 768.72 Ha in Belaban Raya Estate exclude the scope of certification due to RaCP progress. In Time Bound Plan is planned on 2020.					
1.5.2	Area Statement					
		PT ASM	Smallholders	Total		
	• Total area	5,355.97	960.80	6,316.77 Ha		
	• Mature area	4,881.02	914.77	5,795.79 Ha		
	• Mill	8.40	-	8.40 Ha		
	• Emplacement	87.70	-	87.70 Ha		
	• Infrastructure	228.75	35.76	264.51 Ha		
	• Lowland / swamps	24.50	-	24.50 Ha		
	• Unplanted area and Occupation	22.96	10.27	33.23 Ha		
	• HCV	102.64	-	102.64 Ha		
1.6	Planting Year and Cycles					
1.6.1	Age profile of planting year					
	Planting Year	Hectarage (Ha)				
		Pembangunan Raya Estate	Bengkuang Raya Estate	Belaban Raya Estate	Cooperative Agro Seriam Mandiri	Total
	2009	1,063.14	479.48	390.69	911.12	2,844.43
	2010	152.35	1,531.12	1,162.05	-	2,845.52
	2011	-	12.23	70.91	-	83.14
	2012	9.59	-	9.46	3.65	22.70
	TOTAL	1,225.08	2,022.83	1,633.11	914.77	5,795.79

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 (%)
	Pembangunan Raya	60	280,040.76	65,413.06	23.36	7,358.44	2.63
<i>*Production data source from September 2017 – August 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)	%
	Pembangunan Raya	1,318.22	1,225.08	30,778.60	25.12	30,778.60	100
	Bengkuang Raya	2,304.58	2,022.83	43,121.85	21.32	43,121.85	100
	Belaban Raya	2,501.89	2,359.07	39,455.87	16.73	39,455.87	100
	Cooperative Agro Seriam Mandiri	960.80	914.77	26,996.30	29.51	26,996.30	100
	TOTAL	7,085.49	6,521.75	140,352.62	21.52	140,352.62	100
<i>*Production data source from September 2017 – August 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)		
	Teluk Rengit Estate (RSPO Non Certified)	Subsidiary of Bumitama Agri Ltd		1,707.00	17,147.68		
	Seriam Jaya Estate (RSPO Certified)	Subsidiary of Bumitama Agri Ltd		1,721.48	72,481.08		
	Membuluh Sejahtera Estate (RSPO Certified)	Subsidiary of Bumitama Agri Ltd		3,270.27	48,595.02		
	Banjar Sari Estate (RSPO Certified)	Subsidiary of Bumitama Agri Ltd		2,085.10	1,147.69		
	Sungai Bedaun Estate (RSPO Non Certified)	Subsidiary of Bumitama Agri Ltd		3,108	217.91		
	Kendawangan Estate (RSPO Certified)	Subsidiary of Bumitama Agri Ltd		1,722.90	33.79		
	Sungai Tengar Estate (RSPO Non Certified)	Subsidiary of Bumitama Agri Ltd		871.86	115.44		
	TOTAL					139,738.61	
<i>*Production data source from September 2017 – August 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 to (tonnes/year)		Actual certified product to (tonnes/year)					
	• FFB Production									
	• CPO Production									
	• Palm Kernel (PK) Production									
	will be verified during the 1 st Surveillance Assessment									
1.8.2	Product selling									
	Tonnage of selling product		Period of actual selling product (dd/mm/yy) to (dd/mm/yy)							
	• CSPO sold as RSPO certified product									
	• CSPK sold as RSPO certified product									
	• CSPO sold under other scheme									
	• CSPK sold under other scheme									
	• CSPO sold as conventional									
	• CSPK sold as conventional									
	will be verified during the 1 st Surveillance Assessment									
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)				
	Pembangunan Raya		1,318.22	1,225.08	19,601	16.00				
	Bengkuang Raya		2,304.58	2,022.83	32,365	16.00				
	Belaban Raya		1,733.17	1,633.11	26,130	16.00				
	Cooperative Agro Seriam Mandiri		960.80	914.77	14,636	16.00				
	TOTAL		6,316.77	5,795.79	92,732	16.00				
	*Projected FFB production for 12 months of certificate (25 March 2019 to 24 March 2020)									
1.8.4	Estimate of Certified Palm Product Claim									
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO Out put (tonnes)		Extraction (%)	Palm Kernel Out put (tonnes)		Extraction (%)	Supply Chain Module
	Pembangunan Raya	60	92,732	22,256	24	2,782	3			
	*Projected CSPO and CSPK production for 12 months of certificate (25 March 2019 to 24 March 2020)									
1.9	Other Certifications									
	ISO 9001:2008			-						
	ISO 14001: 2004			-						
	OHSAS 18001:2007			-						
	ISCC			-						
	Others									
1.10	Time Bound Plan									
1.10.1	Time Bound Plan for Other Management Units									
	Management Unit		Estate (Supply Base)		Time Bound		Location		Status	

				Plan		
	MILL	Time Bound Plan				
	PunduNabatindo (PT Windu Nabatindo Lestari)	2014	Pundu Nabatindo	2014	Kalimantan Tengah	Certified
			Koperasi Harapan Abadi	2018		Stage-2
			Kelompok Tani Tenera (Independent Smallholders)	2018	Kalimantan Tengah	Certified
			PT Fajar Bumi Nabati	2019	Kalimantan Tengah	Stage-1
			PT Gemilang Subur Maju	2019	Kalimantan Tengah	Stage-1
	Katari Agro (PT Windu Nabatindo Lestari)	2016	Pelantaran Agro Estate	2016	Kalimantan Tengah	Certified
			Katari Agro Estate			
			Pantai Mas Estate			
	Gunung Makmur (PT Karya Makmur Bahagia)	2014	GunungMakmur	2014	Kalimantan Tengah	Certified
			Sungai Mentaya			
			Bukit Kecubung			
			Bukit Makmur			
			Bukit Daman			
			KUD Mekar Jaya	2019		-
			KUD Sekar Tani			-
			KUD Lestari			-
			KUD Usaha Bersama			-
			KUD Makarti Jaya			-
			KUD Marga Rahayu			-
			KUD Tani Santoso			-
			PT Tanah Tani Lestari	2020		NPP Process
			KUD Hapakat			-
			KUD Rika Bersatu			-
			KUD Usaha Bersama			-
			KUD Eka Harahap			-
KUD Berkat Usaha Bersama			-			
KUD Bina Tani			-			
Kelompok Tani Karya Bersama (Independent Smallholders)			2019	-		
Bukit Makmur (PT Karya Makmur Bahagia)	2019	Sungai Puring (PT Langgeng Makmur Sejahtera)	2019	Kalimantan Tengah	ST-1	
		KUD Telawang Bersatu	2020		-	

		KUD Hinje Ate			-
		KUD Eka Harahap			-
Kotawaringin (PT Bumitama Gunajaya Abadi)	2019	Sepantaian	2019	Kalimantan Tengah	ST-1
		Danau Merah			
		Kotawaringin			
		Tonam Raya			
Lamandau Mill (PT Bumitama Gunajaya Abadi)	2020	(PT Bumitama Gunajaya Abadi)	2020	Kalimantan Tengah	-
		KUD Kompak Maju Bersama			-
		KUD Mitra Bahaum			-
		KUD Tanjung Biru			-
		Kumai Hilir Estate (PT Andalan Sukses Makmur)			-
		KUD Seberang Jaya Sejati			-
		KUD Pulau Sejahtera			-
		PT Investa Karya Bhakti			-
Kendawangan Mill (PT. Gunajaya Karya Gemilang)	2016	Mekar Utama	2016	Kalimantan Barat	Certified
		Kendawangan			
		Banjar Sari			
		Seriam Jaya			
		Membuluh Jaya			
		Koperasi Serba Usaha Bersama	2019		-
		Koperasi Serba Usaha Karya			
		Koperasi Binasari			
		Koperasi Perkebunan Fajar Mandiri			
		Koperasi Rimba Sari			
SukaDamai (PT Rohul Sawit Industri)	2019	PT Masuba Citra Mandiri – 1567.07 Ha	2019	Riau	-
		PT Masuba Citra Mandiri – 326.04 Ha	2020		-
		KUD Karya Melayu Sejati	2019		-
Pembangunan Raya Mill (PT Agro Sejahtera Manunggal)	2019	Pembangunan Raya	2019	Kalimantan Barat	ST-2
		Bengkuang Raya			
		Belaban Raya			
		KopBun Agro Seriam Mandiri			
		PT Agro Sejahtera Manunggal – 768.72 Ha (Belaban Raya	2020		

		Estate - The area with suspect liability mechanism)			
		Teluk Rengit (PT Gunajaya Harapan Lestari)	2020		
		KUD Bawal Sejahtera Mandiri	2020		-
		Marau Raya			ST-1
		KUD Rangkong Betuah	2019		-
		KUD Rasau Tiga Bersama			-
		PT Agriplus	2121		-
Sungai Rasau Mill (PT Karya Bakti Agro Sejahtera)	2018			Kalimantan Barat	
Selucing Mill (PT. Windu Nabatindo Abadi)	2019	Serawak Damai (PT Windu Nabatindo Sejahtera)	2019	Kalimantan Tengah	-
		PT. Windu Nabatindo Abadi	2019		-
		KSU Sehati Pundu	2019		-
		PT Nabatindo Karya Utama	2019		-
		KUD Koling Hapakat	2019		-
		PT Ladang Sawit Mas	2019		NPP
		KopBun Bukti Tunggal Sejahtera	2019		-
		KopBun Mitra Penjataan Permai	2019		-
		PT Lestari Gemilang Intisawit	2020		NPP
		KUD Kayong Sekayuk	2020		-
		KUD Mitra Sejati	2020		-
		PT Ago Manunggal Sawitindo	2019		NPP
		PT Nabati Agro Subur	2020		-
		PT Sejahtera Sawit Lestari	2020		-
		PT Karya Makmur Langgeng	2020		NPP
		PT Gemilang Makmur Subur	2020		-
		KUD Istana Pawan Mandiri	2020		-
		KUD Rungau Sejahtera	2020		-
		PT Damai Agro Sejahtera	2020		-
		PT Sentosa Prima Agro	2021		-
Bukit Tunggul Jaya Mill (PT Ladang Sawit Mas)	2020			Kalimantan Barat	
Bukti Belaban Mill	2021			Kalimantan Barat	

	(PT Sentosa Prima Agro)	PT Raya Sawit Manunggal	-
		PT Wahana Hujau Indah	-
1.10.2	Progress of Associated Smallholders and Outgrowers for Certifiable Standard		
	there are an area of 2000 hectares of smallholders in cooperation with PT ASM, 960.80 ha has been audited in line with this assessment. the rest of the area still preparation for audit and there is area covering 768.72 Ha in Belaban Raya Estate exclude the scope of certification due to RaCP progress.		

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ST-2	<p>1. Moh Arif Yusni (Lead Auditor). Indonesian citizen. Bachelor of Agriculture, majoring in Plant Plant Protection. Has experience as an operational staff at a private oil palm plantation company in Indonesia on 2010 to 2012. Has attended several trainings, i.e.: ISO 19011, ISO 9001; ISO 14001, SA 8000, RSPO lead auditor, ISPO lead auditor, OHS expert, OHS auditor based on National Government No. 50/2012, SCCS, etc. Has conducting ISPO, RSPO and MSPO audit as an auditor and lead auditor with expertise on best management practices for estate and mill, legality, worker welfare, safety, social, environment, conservation, transparency, long term economic management plan and supply chain for palm oil mill aspects. During the audit, he verified worker welfare, supply chain, social and legal aspect.</p> <p>2. Mohamad Amarullah (Auditor). Indonesian Citizen. Master of Wood Science and Technology and Bachelor of Forestry, majoring in Forest Product Technology. Has experience as an Agronomist and Research Assistant in Indonesia and Malaysia from 2008 to 2014. Has attended several trainings such as lead auditor of ISPO, RSPO, ISO 17021, ISO 17065, ISO 9001, ISO 19001, ISO 14001, SA 8000, HCV, SCCS, etc. Has conducting several RSPO, ISPO and MSPO audit scheme as an auditor and lead auditor with expertise on best management practices for estate and mill (BMP), environment, conservation, safety, legal, social and supply chain aspects. Fluent in Bahasa, Malay and English. During the audit, he verified BMP, safety and transparency aspects.</p> <p>3. Steve Mualim (Auditor). Indonesia citizen. Master of Environmental and Natural Resources Management. Has experience as an environmental management consultant in 2012 and sustainable palm oil assurance auditor since 2013. Has attended several trainings i.e.: supply chain, palm oil GHG emission, HCV management, ISPO lead auditor, RSPO lead auditor, labor and human rights issues, ISO 19011, SA 8000 ISO 9001:2008, etc. Has conducting several audit for RSPO, ISPO and MSPO scheme with expertise on best management practices, conservation and environmental management. Fluent in Bahasa and Chinese Mandarin. During the audit, he verified environmental management, HCV aspects.</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ST-2	<p>Number of auditors : 3 auditors.</p> <p>Number of days for Stage 02 at site : 5 days.</p> <p>Number of working days for Stage 2 at site : 15 Working days.</p>
NC Verifications	<p>Number of auditors : 1 auditor</p> <p>Number of days for NC Verifications at site : 2 days</p> <p>Number of working days for NC Verifications at site : 2 Working days</p>
2.2.2	Assessment Process
ST-2	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Agro Sejahtera Manunggal – Pembangunan Raya POM to the requirements of Indonesian National Interpretation of RSPO Principles and Criteria 2013 by INA-NITF, July 2016 (Endorsed by the RSPO Board of Governors meeting on 30th September 2016), RSPO P&C Certification System 2017 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).</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> <p>Some opportunities for improvement of the results ST-2 delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase (ASA-1).</p> <p>Improvement of findings from main assesment findings were observed by auditors at this ST-2 assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ST-2.</p>

	The assessment program please find Appendix 2
2.2.3	Locations of Assessment
ST-2	<p>Number of units in this certification activity is one Palm Oil Mill and one estates, which supply the raw material (FFB) to Pembangunan Raya Mill In conducting the assessment, the team of auditors used the $0.8\sqrt{y}$ formula to determine the management units sampling to be focused on and also considered the issues raised by stakeholder. Based on this formula, the team of auditors determined that the sampling locations are :</p> <p>Pembangunan Raya Mill</p> <ul style="list-style-type: none"> - Station FFB Sortation/Grading. Observation and interview with 4 FFB Graders on their understanding towards technical, safety, manpower, environment and regulations aspects. - Station Sterilizer. Observation and interview with 2 Operators on their understanding towards technical, safety, manpower, environment and regulations aspects. - Station Bunch Press. Observation and interview with 1 Operator and 1 Maintenance Staff on their understanding towards technical, safety, manpower, environment and regulations aspects. - Station Press. Observation and interview with 1 Operator and 1 Laboratory Staff on their understanding towards technical, safety, manpower, environment and regulations aspects. - Station Kernel. Observation and interview with 2 Operators on their understanding towards technical, safety, manpower, environment and regulations aspects. - Station Boiler. Observation and interview with 3 Operators on their understanding towards technical, safety, manpower, environment and regulations aspects. - Station Power/Engine Room. Observation and interview with 1 Operator on his understanding towards technical, safety, manpower, environment and regulations aspects. - Station Clarification. Observation and interview with 2 Operator on their understanding towards technical, safety, manpower, environment and regulations aspects. - Condensate Pond. Observation on safety implementation. - Fuel Tank. Observation on safety implementation. - Hydrant simulation. Observation on the readiness of fire fighting team and its devices - Workshop. Observation and interview related to environmental aspect, OHS, work ethic, and worker welfare. - Material Storage Warehouse. Observation and interview related to environmental aspect, OHS, working procedure, and worker welfare. - Hazardous Waste Warehouse. Observation and interview related to environmental aspect, emergency response facilities, OHS, and working procedure. - Water Treatment Process. Observation related to working procedure, OHS, worker welfare, and chemical management. - Empty Bunch Area. Observation related to working procedure, OHS, worker welfare and waste management. - Waste Water Treatment Pond. Observation related to working procedure, OHS, worker welfare and waste management. <p>Belaban Raya Estate</p> <ul style="list-style-type: none"> - Chemical Storage Warehouse. Observation and interview on environmental aspect, OHS implementation and understanding of working procedure. - Housing Complex (Emplacement). Observation on workers facilities, domestic waste management, and Rinse House (BMS and BSS), Fuel Tank, Workshop and Land Fire facilities.. - Collector Activity. Blok F49. Observation and interview related to working procedure, OHS, and worker welfare. - Harvesting Activity. Blok G56. Observation and interview related to working procedure, OHS, and worker welfare. - Peat areas block F60. Observation for peat management - EFB application block F56 div 1. Observation for waste management and utilization - Water level block F50. Observation for water table management - Division 2 Block F60. Observation to management of HCV 1.1; 1.3 and 4.1, situated on areas planted in

2010, observation to subsidence poles and piezometer.

- **Division 2 Block G55.** Observation to manual road maintenance through pruning frond located in adjacent with the main and collection roads.
- **Division 2 Block 64.** Observation and interview with Foreman and 2 **Harvesters** on their understanding towards technical, safety, manpower, environment, conservation and regulations aspects.
- **Division 1 Block F56.** Observation to **EFB mulching** on very sandy area, with dosage given was 28 ton/ha/year.
- **Division 2 Block F50.** Observation to **flapgate** (overflow) and **water level** monitoring devices.
- **Division 2 Block F45.** Observation and interview with Foreman and 3 **Fertilizer Applicators** (CaCO_3) on their understanding towards technical, safety, manpower, environment, conservation and regulations aspects.
- **Spraying Activities, Block H67 Division IV (11 workers).** Observation related to working procedure, OHS, and worker welfare.
- **Harvesting Activities, Block 64 / 65 I Division III (1 worker).** Observation related to working procedure, OHS, and worker welfare.
- **FFB transportation Division III.** Observation related to working procedure, OHS, and worker welfare.
- **Boundary pole BPN ASM 35 Block J72; ASM 34 Block J71; ASM 37 Block I72 and ASM 38 Block H71**

Bengkuang Raya Estate

- **Harvesting Activity.** Block B45. Observation and interview on environmental aspect, OHS implementation and understanding of working procedure.
- **Racking Activity.** Block C43. Observation and interview on environmental aspect, OHS implementation and understanding of working procedure.
- **Landfill.** Field Observation related to environmental aspect and waste management.
- **Boundary pole BPN ASM014 block D36A div 1.** Observation for legal operational areas marking
- **Bengkuang riparian block D38A div 1.** Observation for HCV management
- **Bengkuang riparian block C50B div 2.** Observation for HCV management
- **Boundary pole BPN ASM 60 block 39A div 1.** Observation for legal operational areas marking
- **Boundary pole BPN ASM 61 block 40B div 1.** Observation for legal operational areas marking I
- **Boundary pole ASM 59 block 42B div 1.** Observation for legal operational areas marking
- **Land application assessment area block 41B div 2.** Observation for pome management
- **Division 3 Block D53.** Observation to **EFB mulching** on sandy area and field drain patterns.
- **Division 3 Block D54.** Observation and interview with Foreman and 1 **Harvester** on their understanding towards technical, safety, manpower, environment, conservation and regulations aspects.
- **Division 3 Block E53.** Observation and interview with Foreman and 4 **Manual Upkeep Workers** which also works as Pesticide Applicators, on their understanding towards technical, safety, manpower, environment, conservation and regulations aspects.
- **Division 3 Block E50.** Observation and interview with Foreman and 2 **Fertilizer Applicators** (NPK-13) on their understanding towards technical, safety, manpower, environment, conservation and regulations aspects.
- **Division 3 Block E51.** Observation to **pheromone trap** installation.
- **Division 3 Block C46.** Observation to **riparian zone of Bengkuang River** which also **HCV 1.1; 1.2; 1.3 and 4.1; flapgate** (overflow) and **water level** monitoring devices.
- **Housing Complex (Emplacement).** Observation on workers facilities, domestic waste management, and Rinse House (BMS and BSS), Fuel Tank, Workshop and Land Fire facilities..

Pembangunan Raya Estate and Cooperative Agro Seriam Mandiri

- **Harvesting Activity.** Block A9. Observation and interview on environmental aspect, OHS implementation and understanding of working procedure.
- **Chemical and Material Storage Warehouse.** Observation and interview on environmental aspect, OHS implementation and understanding of working procedure.
- **Housing Complex (Emplacement).** Observation on workers facilities, domestic waste management, and Rinse House (BMS and BSS), Fuel Tank, Workshop and Land Fire facilities..
- **Division 4 Block B20.** Observation and interview with Foreman and 1 **Harvester** on their understanding towards technical, safety, manpower, environment, conservation and regulations aspects.

	<ul style="list-style-type: none"> - Division 4 Block 26/27. Observation to EFB mulching on sandy area and field drain patterns. - Division 4 Block B23. Observation and interview with Foreman and 2 Fertilizer Applicators (Borate) on their understanding towards technical, safety, manpower, environment, conservation and regulations aspects. - Boundary pole BPN ASM 014 Block D36A; ASM A61 Block D39; ASM 60 Block 40 B and ASM 59 Block B42 - Boundary pole BPN ASM 58 Block A03; ASM A57 Block A04 - HCV area (HCV 6) Block A7 <i>Patah Peradeh</i> – religious area for local people - Block C26; C37. Observation about occupation area <p>Stakeholder Consultation</p> <ul style="list-style-type: none"> - Manpower and Transmigration Agency of Ketapang Regency - Environment Agency of Ketapang Regency - Agriculture, Plantation and Animal Husbandry Agency of Ketapang Regency - Labour Agency of Ketapang Regency - Agro Seriam Mandiri Cooperative and Scheme Smallholders - Seriam Village
NC Verifications	<ul style="list-style-type: none"> - Weightbridge Station Pembangunan Raya Mill, Interview with head of administration and weightbridge operator related SCCS, Separated FFB from certified and un certified area. - Block A12/13 Pembangunan Raya Estate, field observation related the mechanism of Separated FFB from certified and un certified area. - Block B37, C31 Bengkuang Raya Estate, field observation related the mechanism of Separated FFB from certified and un certified area. - Block F67 Belaban Raya Estate, field observation related the mechanism of Separated FFB from certified and un certified area.
2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ST-2	<p>Consultation of stakeholders for PT Agro Sejahtera Manunggal was held by:</p> <ul style="list-style-type: none"> • Public Announcement at Mutuagung website (www.mutucertification.com) and RSPO website (www.rspo.org) on July 27, 2018. • Consultation with Government Agency on September 03, 2018. • Consultation with local stakeholders (community surround/village) on September 04, 2018. • Consultation with NGO (by email) on September 28 August 2018. <p>Numbers of input from stakeholders were clarified by PT Agro Sejahtera Manunggal as apart of RSPO report</p>
2.3.2	Stakeholder contacted
	Please find appendix 1
2.4	Determining Next Assessment
	The next visit (ASA-1) will be determined at least 8 to 12 months approval of RSPO certification process by CB.

3.0. ASSESSMENT FINDINGS

3.1. Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Pembangunan Raya POM – PT. Agro Sejahtera Manunggal., Bumitama Agri Ltd. Group operation consisting of one (1) mill and four (4) oil palm estates.

During the assessment, there were nine (09) Nonconformities were assigned against Major Compliance Indicators; five (5) nonconformities were assigned against Minor Compliance Indicators; and one (1) nonconformance 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 the company are provided in section 3.5. The company has already prepared and implemented the corrective action that had been reviewed and accepted by Auditor in form of documentation evidences e.g. (document record/photographic/etc...). Those corrective actions taken that consist of 09 Nonconformities were assigned against Major Compliance Indicators; five (5) nonconformities were assigned against Minor Compliance Indicators; and one (1) nonconformance against supply chain requirement for CPO mill had been closed out shall be verified during next assessment.

MUTUAGUNG LESTARI found that Pembangunan Raya POM – PT. Agro Sejahtera Manunggal., Bumitama Agri Ltd. Group complied with 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 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 *issued*

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
PRINCIPLE #1 COMMITMENT TO TRANSPARENCY		
1.1	Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	
1.1.1	<p>A list of information that can be accessed by stakeholders is explained in the Communication Procedure (Document No. ASM-SUST-SOP-08-R1, Revised No. R1 signed 02-14-2017). The information such as: HGU documents, SEIA, UKL / UPL, RKL / RPL Reports, Company Policy, HCV, SIA, etc.</p> <p>The company can be demonstrated list of stakeholders such as: Head of Seriam Village, Labour Agency, Local Contractors, Scheme Smallholders, Smallholders Cooperatives, Plantation Agency, Environment Agency, National Land Agency, Etc. Ensure the existence of environmental and social NGOs and be included in the stakeholder list. OFI No. 1</p>	
1.1.2	<p>The procedure for responding to stakeholders is explained in the Communication Procedure (Document No. ASM-SUST-SOP-08-R1, Revised No. R1 signed 02-14-2017). In the procedure it is explained that the department responsible for providing or updating information are Corporate Affairs Department, Corporate Communication Department, CSR Department, Head of Administration, Human Resources Department and Unit Managers. The time to respond to information requests is 15 days.</p>	

From document review of the Logbook Documents of 2018, there was no request for information from the stakeholders, so there was no response. Based on interview with representatives of stakeholders, it was known that they had not requested information from the company. However, the company continues to submit mandatory reports to the relevant agencies, for example:

- Development of plantation business report, quarter 1 (Jan to March 2018), received by Plantation Department on May 07, 2018.
- Development of plantation business report, quarter 2 (April to June 2018), received by Plantation Department on August 2018.
- P2K3 report, quarter 1 (January to March 2018), received by Labor Agency on April 20, 2018.
- P2K3 report, quarter 2 (April to June 2018), received by Labor Agency on August 08, 2018.

Status: Comply

OFI No. 1

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.

A list of information that can be accessed by stakeholders is explained in the Communication procedure (Document No. ASM-SUST-SOP-08-R1, Revised No. R1 on 02-14-2017). The information such as: HGU documents, SEIA, UK / UPL, RKL / RPL Reports, Company Policy, HCV, SIA, etc. The document is stored in the estate and factory office.

Status: Comply

1.3

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

1.3.1

Commitment to the integrity code and ethical conduct in all operations area and transaction contained in Code of Conduct document number BGA-COC-HC-333.1-RO dated October 28, 2014. Code of conduct and integrity policy are also listed in BGA group sustainability policy. This policy contained commitment of the company to make an ethical code and integrity in line with good corporate governance in all levels of operation area. In the code of conduct document chapter II "Basic Principles of Good Corporate Governance (GCG), companies respecting fair business practices such as: Transparency, Accountability, Responsibility, Independence, Fairness, and Equality. Code of Conduct BGA Group point 4:12 states on the Granting and Acceptance of gifts, bribes and other.

Transparency commitment listed in BGA code of conduct chapter II "Basic Principles of Good Corporate Governance" point 2.1 with redaction "Company provides material information that relevant, understood and accessible by the stakeholders"

The policy has been communicated shown by:

- Socialization the code of conduct official report dated March 18, 2017. Socialization held on March 15, 2017 on BRYE attended by 70 participant.
- Socialization the code of conduct official report dated February 01, 2017. on PRYE attended by 29 participant.
- Socialization the code of conduct official report dated January 31, 2017. on PRYE attended by 86 participant.

Based on interview with local contractor, worker union and committee gender, it is known that they already understand about the policy. Interview with worker in estate and mill informed that there is no issue about integrity and ethical conduct

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

The list of law or regulations is explained in the regulatory list document (law register). Law registers are available in soft and hard copy. The company can demonstrate compliance with these law and regulations, for example: have HGU, have environmental documents, conduct factory wastewater testing, conduct river water quality testing, conduct groundwater quality testing, conduct air quality testing, perform noise and noise testing, pay employee wages, pay employee overtime, etc.

In term of best management practices, it was known that estate and mill management has implementing several pursuance with Indonesia laws and regulations, for example has conducting mechanical or zero burning method during land clearing, palms planted were derived from seeds (DxP) producers, recoqnized by the government of Indonesia , such as DxP Lonsum, DxP Socfin, DxP Sriwijaya, DxP Topaz and DxP Damimas, produced by PT London Sumatra Indonesia, PT Socfin Indonesia, PT Bina Sawit Makmur – Sampoerna Agro, PT Tunggal Yuns Estate – Asian Agri and PT Damimas Sejahtera, respectively. Furthermore, estate has implementing integrated pest management, biological control and only used pesticides listed on pesticide.id.

2.1.2

Information about law or regulations listed in the Law Register document, but there are some law or regulation that have not been listed in the law registers, such as:

- Governor of West Kalimantan Decree No. 706 / 2017 related to the Minimum Wage of the Ketapang Regency of West Kalimantan.
- Ministry of Manpower Regulation No. 5 / 2018 related to Occupational Safety and Health
- Ministry of Environment Regulation No. 45 / 2005 related to RKL / RPL reports
- Ministry of Environment Regulation No. 20 / 2018 related to protected plants and wildlife species
- Ministry of Agrarian and Spatial Planning Regulation / Head of National Land Agency Number 7 / 2017 related to arrangement and procedures for the determination of the HGU
- Ministry of Agriculture No. 5 / 2018 related to land clearing without burning
- Government Regulation No. 71 / 2014 related to the protection and management of peat

Based on the explanation, raised the non conformance No 2018.01 with minor category

2.1.3

To ensure compliance with law or regulations, the company conducts an internal RSPO audit. The last RSPO internal audit was carried out on 17 - 18 July 2018. Audit results are known:

- Bengkuang Raya Estate has 8 NCs and has been improved in August 2018
- Pembangunan Raya Estate has 12 NCs and have been improved in August 2018
- Belaban Raya Estate has 5 NCs and has been improved in July 2018
- Pembangunan Raya POM has 10 NCs and has been improved in August 2018

2.1.4

To ensure any changes in the law or regulation, the company updates the regulations periodically, for example:

- Related to Employment regulation updated on May 25, 2018
- Related to Environmental regulation updated on March 01 2018
- Related to OHS regulations regulation updated on May 25, 2018
- Related to Plantations regulation updated on March 01 2018.

The personal in charge responsible for updating the regulations is each department such as: PAD Department, Sustainability Department, EHS Department, Human Resources Department, etc.

2.1.2 | Status: non conformance N0 2018.01 with minor category

Open

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

PT Agro Sejahtera Manunggal managed area covering 7,085.49 Ha consist of 6124,69 Ha own estate and 960.80 Ha full managed smallholder. Towards that's area PT. Agro Sejahtera Manunggal has had land use title/HGU for his own operating area according to HGU certificate No. 65 (dated on July 17th 2013) located in Seriam Village which covered area **5,630.20 Ha** and decree from The Ministry of Agrarian Affairs and Spatial Planning/National Land Agency No 52/HGU/KEM -ATR/2018 dated 04 June 2018 which covered **494.49 Ha**. The land use tittle for scheme smallholder are No. 127 (dated on August 13th 2015) located in Seriam Village which covered area **960.80 Ha**. According to the agreement between the companies with Plantation Co-Operation Agro Seriam Mandiri agreed that smallholders (Plasma) area were fully managed by PT. Agro Sejahtera Manunggal.

2.2.2

Based on the verification results of the PT Agro Sejahtera Manunggal document, it has identified the land demarcation boundary (HGU poles) which explains the location of the poles, coordinates and the location map of the poles. Management unit have conducted monitoring of boundary stones once month. Documents verifications its known if the monitoring just limited about the pole condition and the presence of poles.. The results of monitoring in June 2018 revealed that there were 6 HGU poles that could not be installed due to their location on the river border. Based on the results of the field visit, it was discovered that there were several stakes whose location did not match the coordinates that had been set, for example

1. Bengkuang Raya Estate HGU poles no ASM A61 Block D39; ASM 60 Block 40 B, the poles is ± 50 meters from the specified coordinates
2. Construction of Raya Estate HGU poles no ASM59 Block A03 is ± 37 meters from the specified coordinates

Related to this matter, the company has not been able to show proof that the boundary mark has been installed in accordance with the coordinates that have been set. **Based on the explanation, raised the non conformance No 2018.02 with minor category**

2.2.3

Result of public consultation with village representative and local customary leader of Seriam Village known that all land compensation process has been well implemented by management of PT. ASM with agreement of 80 : 20. For each land that handed over to the company, they get 20% for plasma area. All compensation process has been held with fairly transparent regarding to mutual agreement. Whole area has been compensated. However, sometimes there are some people who claim they have not received compensation, so they sometimes try to make land claims and disrupt operational areas.

Based on verification of the Outstanding Claim Land in 2018 document, obtained information that in 2017 - 2018 there were several claims from the community. All of these conflicts are double claims where at the beginning of the plantation development GRTT has been carried out but then land claims have emerged from other parties to the same land. All of the land claims have been settled with the involvement of various parties (village parties, community leaders, police and government)

2.2.4 and 2.2.5

The company has a SOP on land conflict management (ASM-PAD-SOP-0117.2-ROO) which aims as a provision for the management of the company and related parties in the process of resolving land conflicts that arise based on an agreement with the right holders or parties who have such interests. in the procedure it is stated that the conflict resolution stage begins with the identification of the area / potential land conflicts, the process of resolving land conflicts. In the procedure shows that every conflict is resolved by consultation with other parties agreed facilitation. The conflict resolution process has followed the principles in FPIC.

The results of interviews with representatives of Village staff of Seriam, community leaders, cooperative ASM, obtained information if that the entire operational area of the company had been compensated. The compensation process involved all community witnessed also by the Village Head, Dayak Customary leader of Seriam Village, Subdistrict head of Kendawangan, Kendawangan Sector Police and Ketapang Regency's staff of plantation agency. Until the audit was carried out, there was no written complaint from the community regarding the land dispute. However, there have been several cases of land claims by community, but this can be handled properly by the company. Although PT ASM has gained land rights legally but there are still many people using and cultivating in permit Area. The company has had the Area Statement map with scale 1:100.000 who described various land use in permit Area, included occupation area width. That's area managed by community are palm oil, rubber or horticulture. In other information, there is no significant land conflict in PT. AMS.

2.2.6

According to the procedure of land dispute handling (ASM-PAD-SOP-0117.2-ROO) conflict resolution must has to do with soft approach such as discussion and negotiation. Based on negotiation document that shown, all land dispute case

always involve the local government. Through the public consultation with related agencies in Ketapang and representatives villagers, there was no coercion approach by the company to handling land dispute cases so far. All compensation implemented by mutual agreement.		
2.2.2	Status: non conformance No 2018.02 with minor category	
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.		
The company has had procedure of Indemnity of Planting and Area (<i>Ganti Rugi Tanam Tumbuh dan Lahan</i> , SOP – PAD - 01 Revisi 001 dated 3 January 2017) which aims to create a standard in the process of compensation for crops and land throughout the BGA Group operational area and minimize errors in the implementation of compensation and land to save the company's assets		
The results of interviews with representatives of Village Seriam, community leaders, cooperative ASM, obtained information if that the entire operational area of the company had been compensated. The compensation process involved all community witnessed also by the Village Head, Dayak Customary leader of Seriam Village, Subdistrict head of Kendawangan, Kendawangan Sector Police and Ketapang Regency's staff of plantation agency. The compensation process is based on the basis of consultation and negotiations are transparent and meet the demands for social justice. The results of the verification document can be shown on the document of the acquisition of land rights shown by the company in the document <i>REKAPITULASI PERMOHONAN DANA GRTT – WILAYAH VII</i> "for the period 2008 - 2015 with a total area of 6,725.66 hectares, to 480 households. Until the audit was carried out, there was no written complaint from the community regarding the land dispute. however, several times there have been cases of land claims by community but so far it can still be handled properly by the company		
The company has been shows the evidence of land compensation to related party. The sample of process land compensation present to land owner was sighted, The copy was made in Bahasa and known by all relevant parties. Although the legal status, acquired land is located within the Land Use Title area of the company, which is in the law the company is controlled legally. These process was involve of land owner and approved by head of village and head of sub district. The documented process of land compensation was signed by related party, filed in each estate.		
	Status: Comply	
PRINCIPLE #3 Commitment to long-term economic and financial viability		
3.1		
There is an implemented management plan that aims to achieve long term economic and financial viability.		
3.1.1		
PT ASM has conducted an analysis of the long term economic viability for years 2017 - 2020. The document describes projections of areal statement, production of FFB, production and price of CPO and PK, capacity, cost, revenue, and profitability. Evaluation of achievement conducted annually, changes will be made if necessary. One of the control function is to conduct annually financial audit by public accountants.		
3.1.2		
Certificate holder does not have a document of replanting program. Based on document review of production and planting years, interview and field visits, the first planting was in 2009 (09 years), no replanting required for the next five years.		
	Status: Comply	
PRINCIPLE #4 Use of appropriate best practices by growers and millers		
4.1		
Operating procedures are appropriately documented and consistently implemented and monitored.		
4.1.1		
Procedure of best management practices is presented is document of Oil Palm Agronomy Standard Operational Procedure (code: BGAAGRKS-SOP-I), issued by Steering Committee Plantation, Organizing Committee Plantation and Director on January 4 th 2011. The SOP of Agronomy was consist of three volumes, which covers all oil palm agronomy aspects, such as technical methods on nursery, palm upkeep, land preparation, integrated pest management, etc.		

Meanwhile, best management practices for oil palm processing or mill operations are presented in document No. BGA-SOP-OP-1002.1 to No. BGA-SOP-OP-1002.14, issued by Chief Operating Officer and Chief Financial Officer on January 13th 2013. The SOP has also consist of three volumes, which covers all technical matters on oil palm processing in all stations, machineries maintenance, laboratory works, etc.

All procedures were available in Bahasa. Master list of procedure for estate and mill were keeps by Manager. Based on procedures document review, it could be concluded that all SOP's were still relevant with current situation and covers all aspect of best management practices in the estates and mill. Based on field observation and interview with Foreman and several workers such as Pesticide Applicators, Fertilizer Applicators and Harvesters in all estates, as well as operators in Mill, it could be concluded that the workers were able to explain and demonstrate its job in accordance with the SOP, such as safe working practices and conservation aspects.

Based on observation to BLRE, PRYE, BRYE and KKPA ASM, it was noted that there were a lot of voluntary oil palm seedlings (VOPS) on the collection road. This matters has identified on the QC report thus resulting sanitation recommendation. Estate management mentioned that sanitation program was still ongoing. The company is encourage to monitor and continue sanitation program, especially on VOPS, woodies and other weeds. **OFI with observation.**

Procedure of safe working practices towards agrochemicals application is presented in several documents, e.g. procedure No. SOP BGAAGRKS- PTKS-PHT about integrated pest management, procedure No. SOP BGAAGRKS- PTKS-PPS about pesticide management, hazard identification risk assessment control (HIRAC) for estates and mill and material safety data sheet of each agrochemicals used.

4.1.2 and 4.1.3

Update and distribution of standard operation procedures was conducted by Department of Sustainability. For monitoring of procedure consistency purposes, as well as its evaluation, some mechanism had been conducted by mill and estate management which presented in the following documents:

- Quality Control (QC) report conducted by QC Department from Regional Office for several activities such as harvesting system, manuring system, pesticide application system. The report mentioned about work achievement. For example, as mentioned in QC report dated August 2nd 2018, agronomy working quality on July 2018 was classified as fair (point 50-70).
- Declaration of field inspection for Region 7A dated July 10th 2018 which conducted by Staff QC, Estate Manager and Area Controller.
- Manager monthly report.
- Daily statistics report which informed crop FFB production, volume of CPO and kernel, extraction rate, product quality parameters, transaction, etc.
- Monthly quality control report. For example, report No. 007/R-LBD/AQC/QCO/VII/2018 dated August 2nd 2018 for area Region 7A (includes PRYE, BRYE, BLRE and KKPA ASM) mentioned that agronomy quality in PT ASM was fair. Report has also describes problem topic, condition description, root cause, QC recommendation and time frame of correction. Among parameter assessed in this report are quality of harvesting, fertilizer application, spraying (pesticide application) and mature area.
- RSPO internal audit. For example, audit for PRYE and BRYE were conducted on July 17th to 18th 2018, with total NCR were 12 and 8, respectively. All NCR has fully closed on August 10th 2018.
- Manuring recommendation which conducted by Department of Research.

However, based on document review and field observation, it was known that there were area for about $\pm 1,427.11$ ha which not included on the scoop of certification (non-certified area), but still managed under PT Agro Sejahtera Manunggal management. Those area were divided into ± 299.50 ha in Belaban Raya Estate, ± 604.98 ha in Bengkuang Raya Estate, ± 522.63 ha in Pembangunan Raya Estate and ± 40.47 ha in KUD Agri Seriam Mandiri. Regarding this matters, company management was not be able to shows that any records related to oil palm agronomy and environment management for example fertilizer and pesticide consumption and Green House Gasses calculation, etc. were been separated towards certified and non-certified area. Thus, mechanism of documentation for certified and non-certified area is not available.

Based on the explanation, raised the NC No. 2018.03 with minor category

In order to maintain workers knowledge towards technical matters, several training has conducted by unit management, as follows:

- Training of integrated pest management has conducted in December 25th 2017, attended by 8 participants.
- Training and simulation of pesticide application has conducted in Division 3 Block B53 BRYE on August 14th 2018, attended by 22 participants from PT ASM.
- Training and simulation of pesticide application has conducted in Division 3 Block D53 BRYE on August 7th 2018, attended by 8 pesticide applicators.

4.1.4

Based on the results of the document review, a field visit revealed that there was an area of $\pm 1,427.11$ Ha of the area not included in the scope of the certification that was managed by PT Agro Sejahtera Manunggal with the area in each estate are Belaban Raya Estate ± 299.50 Ha, Bengkuang Raya Estate ± 604.98 Ha, Pembangunan Raya Estate ± 522.63 Ha and KUD Agro Semesta Mandiri covering 40.47 Ha. Pembangunan Raya POM can show FFB receipt data from each estate for the period of September 2017 - August 2018 but the data presented does not inform the volume of FFB received in POM from areas that not included in the scope of the certification. Based on the explanation, raised the non conformance **NC 2018.04 with minor category**

4.1.1 Status: OFI with observation

4.1.3 Status: non conformance No 2018.03 with minor category

4.1.4 Status: non conformance No 2018.04 with major category

4.2

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

4.2.1

Procedure related to soil fertility enhancement is presented in document No. SOP BGAAGRKS-PTKS-PMK dated January 4th 2011 about manuring, No. BGA-AGR-KS-SOP-05 dated May 25th 2011 Volume 1 about soil and water conservation, No. BGA-AGR-KS-SOP-09 dated May 25th 2011 Volume 2 about manuring and No. BGA-AGR-KS-SOP-16 dated May 25th 2018 Volume 3 about management on marginal soil. The procedure mentioned that manuring program should be based annual on leaf and soil analysis. in order to enhance soil pH on peat area, estate management has conducting water management, for example as seen in Division 2 Block F60 and F50 BLRE for subsidence pole monitoring and overflow through flap gate. Based on document review and field observation, it was known several strategy which already implemented by estate management for soil fertility enhancement and soil conservation, as follows:

- Manuring activities as seen in Division 2 Block F45 BLRE, Division 3 Block E50 BRYE and Division 4 Block B23 PRYE for CaCO_3 , NPK13 and Borate application, respectively.
- Selective weeding on the palm circle which aims to accelerate nutrient uptake by the palms as seen on Division 3 Block E53 BRYE.
- By product application through empty fruit bunch (EFB) mulching as seen on Division 1 Block F56 BLRE, Division 3 Block BRYE and Division 4 Block B26 PRYE. Dosage of application was 28 ton/ha/year.
- Palm oil mill effluent (POME) land application as seen in Division 2 Block 42B BRYE. Dosage of application was 750 $\text{m}^3/\text{ha}/\text{year}$.
- To maintain land cover crop condition which planted by *Mucuna bracteata* and *Nephrolepis bisserata*, especially on peat and very sandy soil area.

Record of fertilizer application, included EFB mulching and land application were available. This is indicate management strategy towards soil fertility improvement were satisfactory monitored. Furthermore, based on observation and interview with fertilizer applicators in Division 2 Block F45 BLRE, Division 3 Block E50 BRYE and Division 4 Block 23 PRYE, it was known that all applicators were able to explain and demonstrate their technical work, in accordance with the procedure, for example fertilizer placement, dosage, time of application, prohibited palms or area which prohibited to be manured (ex. riparian and conservation zone) and PPE to be used.

4.2.2

Estate management shows fertilizer consumption during 2018. According to the fertilizer application record as per August 2018, it could be concluded that fertilizer application achievement were varies from 0 % to 85 %, with average about 30 %. The delay was due to prolong of drought season (rainfall <100 mm/month) for about two month consecutively on July to

August and very wet season (rainfall >250 mm/month) which happened on March to May 2018. The rest of program will be continued until filled the target in 2018. Furthermore, apart from chemical fertilizer, estate management has also implementing EFB mulching which aims to enhance organic matters, retain soil moisture and additional nutrient K. among fertilizer applied are RP, Urea, Borate, Kieserite, CuSO_4 , CaCO_3 and NPK-13.

4.2.3

Procedure of leaf and soil sampling is presented in document No. 153/RSC-ADM/XII/15 dated December 7th 2015, while the mechanism is detailed explained in Internal Memo of palm Oil Research Head No. 004/IOM/RSC/II/15 dated February 1st 2015. Procedure mentioned that leaf and soil analysis were fully conducted annually. As noted, annual soil sampling was taken for about 20 % from total area which represent soil type on the particular estate. Department of Research of Regional 7 which responsible for PT ASM agronomy matters, has able to shows leaf and soil testing results for BRYE, BLRE and PRYE dated August 1st 2017. The results were used for manuring recommendation for period 2018. Among parameter tested on leaf analysis are dry matters of macro nutrients (N, P, K, Mg and Ca) and micro nutrients (B and Cu). Meanwhile, parameter tested on soil analysis are pH, texture, dry matters of macro and nutrients, N/K ratio, available P and cation exchange capacity. Those laboratory analysis results were used as consideration in the annual fertilizer recommendation calculation.

4.2.4

Procedure of nutrient cycle application is presented in document No. SOP BGAAGRKS-PTKS-PMK dated January 4th 2011 Volume 1. Apart from chemical fertilizer application, estate management has also conducting by-products application such as empty fruit bunch (EFB) mulching and palm oil mill effluent (POME) land application as shown in several location during field observation, for example as follows:

- EFB mulching as shown in Division 1 Block F56 BLRE, Division 3 Block BRYE and Division 4 Block B26 PRYE. Dosage recommended was 28 ton/ha/year which applied in two rotation. EFB mulching was prioritize to be conducted on very sandy soil area, stacked on the inter palm and the edge of harvesting path. Record of EFB mulching was available.
- Land application as shown in Division 2 Block 42B BRYE. This Block is ongoing to get the permit, under trial and analysis by the Regent of Ketapang Estate. Dosage recommended was 750 m³/year, divided into three rotation.
- Furthermore, U-shape fronds stacking and planting of cover crop has also considered as biomass cycle on the field, which could be release additional nutrient K.

Those method mentioned above has advantages to enhance soil fertility through supplying additional nutrient N and K, increase organic matters on very sandy soil area and retain soil moisture on the field. Research Department informed that the rest of EFB mulching program in PRYE, KKPAASM and BRYE will be continued up to December 2018.

Status: Comply

4.3

Practices minimize and control erosion and degradation of soils.

4.3.1

The company has soil map with scale 1:50,000 which derived from soil survey conducted by Research Department on August 18th 2015. According to the soil map, it could be concluded that there were fragile soils within estate operational areas, as shows through the presence of peat soil, mineral acidic sulfate and very sandy soil texture. However information of soil condition in KKPA ASM was included on PYRE areas. Furthermore, there were also presence of marginal soils through peat (developed), mineral lateritic and alluvial. Thus, main limitation of PT ASM operational areas were due to acidic soils, very sandy soil texture and low fertility.

4.3.2

Strategy of planting on several slope condition is presented in document No. SOP BGAAGRKS-PTKS-PLH dated January 4th 2011 about land preparation, No. SOP BGAAGRKS-PTKS-KTA dated January 4th 2011 about soil and water conservation and No. SOP BGAAGRKS-PTKS-PKS about oil palm planting. Based on Slope Map Scale 1:150,000, it was informed that in general, slope condition in PT ASM and KKPA ASM were dominantly flat to undulating 99.90 % while there was a very small portion of rolling area. Main limitation on this flat areas was presence of low-lying areas which prone to flooded. To overcome this situation, estate management has installing field drain system with ratio 1:4 and 1:8. This field drains has also adopted to enhance soil pH on peat and acidic sulfate areas through water discharge/flushing.

Furthermore, in order to minimize surface run-off on sandy soil areas, U-shape frond stacking and EFB mulching has also adopted by estate management. Furthermore, based on observation to PRYE, KKPA ASM, BLRE and BRYE, it was known that cover crop condition by *Mucuna bracteata* and *Nephrolepis bisserata* were considered satisfactory.

4.3.3

Program of road maintenance is presented in the estate annual budget. The company has road maintenance program which conducted by own estate through pruning half of fronds located on the edge of the road as seen in Division 2 Block G55 BLRE. This is aims to let sun light directly go to the road surface. For road grading and compaction, this matters has conducted by Contractor namely PT Devindo Prima Mandiri. Based on interview with contractor, it was informed that road maintenance was conducted by estate management annually. For example, road consolidation in BRYE were totaling about 11,378.94 m and 6,971.00 m in collection road and main road, respectively. Based on field observation, it could be concluded that road conditions in BLRE, BRYE, PRYE and KKPAASM were considered satisfactory and easily passable for fruits extraction.

4.3.4

Procedure on marginal soil management are presented in document No. BGAAGRKS- PTKS-PLM dated January 4th 2011 Volume 3, Research Manager Circular of No. 015/IOM/RSC/IV/2015 dated April 24th 2015 and about piezometer installation and Internal Memo No. 12/IOM/RSC/II/14 about subsidence poles installation. Procedure mentioned that water level was maintained in between 60 to 80 cm. According to soil map analysis, it was informed that there were no peat on PRYE and KKPA ASM operational areas, while there was about 10.64 % (279.72 ha) in BRYE and 30.21 % (803.25 ha) in BLRE were identified as peat areas. However, soil peat depth were bellow 3.00 m which considered as shallow peat. Research Department informed that peat subsidence, water level and water table monitoring were only conducted on BLRE. Record of water management activities in BLRE was available. According to the record of water table and subsidence during April to August 2018, it could be concluded that water table has drop due to water level control on flap gate (overflow) was not able to maintain water level maximum on 60 cm. This is confirmed during observation to Division 2 Block F50 BLRE which shows that at water level more than 70 cm, the water from inside blocks were still flows out. This is indicate that the height setting of flap gate is not correct. Furthermore, high subsidence rate about 0.66 cm/month or approximately about 7.92 cm/year has indicate that water management was not carried out properly.

The company is not be able to shows evidence that peat soil subsidence has been minimized by estate management. Based on soil map of PT ASM dated August 18th 2015 review, it was known that there were presence of peat area in BRYE and BLRE for about 279.71 ha and 803.25 ha, respectively. Furthermore, based on field observation and document related to peat management verification, it was noted several points as follows:

- Evaluation towards peat subsidence were not available. According to peat subsidence monitoring record in BLRE, it was known that subsidence rate was about 0.66 cm/month or ± 7.92 cm/year.
- Evaluation towards water table measurements were not available. According to piezometer monitoring record, it was known that water table from June to July and from July to August were significantly decrease/drop for about 28 cm and 45 cm, respectively.
- Monitoring and evaluation on water level measurement were not available.
- As observed to Division 2 Block F50 BLRE and Division 3 Block C46 BRYE, it was known that scale on water level measurement stick were not clear (cannot be readed).
- As observed to flapgate in Division 2 Block F50 BLRE, it was known that the flapgate was not able to maintain water level at 60 to 80 cm.

Based on the explanation, raised the non conformance No 2018.05 with major category

4.3.5

According to year of planted, palms in PT ASM and KKPA ASM were planted in between 2009 to 2012. Hence, based on one cycle of planting (25 years), replanting activities is expected to be carried out on early in 2034. However, estate management has an opportunity to conduct drainability study on PT ASM and KKPA ASM operational areas. **OFI with observation.**

4.3.6

Strategy of estate management on fragile areas is presented in document No. SOP BGAAGRKS- PTKS-PLH dated

January 4th 2011 about land preparation, No. SOP BGAAGRKS- PTKS-KTA dated January 4th 2011 about soil and water conservation and No. SOP BGAAGRKS- PTKS-PKS about oil palm planting. Estate management had implementing several strategies which aims to overcome several limitation due to presence of fragile and marginal soils, as follows:

- To conduct water management through installation of flapgate and drainage system on the main road, collection road and field drain, especially on peat and very sandy soil areas.
- To conduct EFB mulching as shown in Division 1 Block F56 BLRE, Division 3 Block BRYE and Division 4 Block B26/27 PRYE. Dosage recommended was 28 ton/ha/year which applied in two rotation. EFB mulching was prioritize to be conducted on very sandy soil area, stacked on the inter palm and the edge of harvesting path.
- To conduct land application as shown in Division 2 Block 42B BRYE. Dosage recommended by the agronomist was 750 m³/year, divided into three rotation.
- To conduct U-shape fronds stacking and planting of cover crop has also considered as biomass cycle on the field, which could be release additional nutrient K.
- To conduct fertilizer application as recommended by Department of Research, and conducting selective weeding which aims to minimize nutrients uptake competition with weeds.

Major 4.3.4	Status: Non Conformance No 2018.05 with major category	Open
Minor 4.3.5	Status: OFI with observation	

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

4.4.1
Water sources identification and management plan are listed on HCV identification document and 2017-2018 Conservation Management plan. These document describe the water source identification, Mill water usage monitoring & efficiency, and catchment area protections. Field visits on block D38A and block C50B at BRYE for examples, found that companies managed Bengkuang riparian by marked the buffer zone (throughout 50 m bothsides on riparian), perform revegetation with bamboo, and signboard placement. Company also conducted regularly water quality testing every semester for Bengkuang and Membuluh river. Based on workers interview on PRYE estate housing shown that drinking water for them originated from refill water and PRYM also provides clean water access for workers

4.4.2
Company has identified and shown the maps for catchment areas (including riparian) with 1:40000 scale. This map shown there is river stream on estate i.e Bengkuang river, meanwhile Membuluh river are located outside company operational areas. Company provided procedures for these riparian and catchment areas protection listed on procedures BGA-SOP-ASM-RO-52 document. Field visit during ST-2 audit, for examples on Bengkuang riparian block C46 (BRYE) acquired information that company shown proper ways to maintain and protect the catchment area for example manual weeding and marking the chemical boundary border.

4.4.3
Mill effluent produced by PRYM processed at waste water treatment plant based on procedure BGAAGRKS-SOP-15, until it complying to standards before it distributed to BRYE as land applications based on decree of Ketapang regent No 660/1290/Perkim LH-E/2017. Waste water quality testing document review shown for periods April - July 2018, all of waste water testing parameters is compliant to the standards quality for examples BOD on July 2018 are 2,308 mg/l. Waste water management and monitoring also has been reported to related institutions per 3 month regularly.

4.4.4
PRYM water usage and monitoring are provided and has been listed on Water usage monitoring 2018 documents. Standards of water usage for FFB process recorded on 2018 budget, projected 1.40 m³/mt FFB processed. Water usage monitoring was done periodically and recorded, for example on August 2018 FFB processed are 25,364 mt meanwhile process water usage 28,915 m³, and water usage efficiency was 1.14 m³/mt FFB processed. Observations on PRYM water treatment plant found monitoring for raw and process water usage was done by officer periodically, and flowmeters at inlet/outlet serves normally.

	Status: comply	
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4.5 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated

Pest Management techniques.
4.5.1

Estate management has committed to adopting and implementing integrated pest management (IPM) which presented in procedure No. BGAAGRKS-SOP-I dated January 4th 2011 Volume 3 and procedure No. BGAAGRKS- PTKS-PHT about pest and disease. The procedure mentioned that pesticide application shall be based on census analysis when the incident were more than economic threshold. Furthermore, pest population control through biological method has also adopted to minimize pesticide consumption. Procedure for biological rat population management is presented in internal agricultural and technical circular No. 004/IAC/RSC/VII/2016 dated July 19th 2019. Realization of IPM program in 2018 is presented as follows:

Census and analysis

- Based on *Oryctes rhinoceros* census in Division 1 BRYE on May 2018, it was known that incidence above economic threshold (>5 %) were identified in Block F54a and F55a. hence, carbofuran and cypermethrin were recommended by Agronomist on that particular blocks with dosage average active ingredient for about 12 kg/ha and 0.33 l/ha, respectively.
- Based on rat census in Division 1 BLRE on July 2018, it was known that incidence above economic threshold (>5%) were identified in Block 47a, F48a, G50A, H56a and H57a. Hence, Brodifacoum 0.005 was recommended with dosage average active ingredient for about 15.23 kg/ha.

Biological control

For biological pest control, estate management has adopting planting of beneficial plants such as *Turnera subulata* and *Antigonon leptopus* for leaf eating caterpillar population control. As observed to estate field, it was known that beneficial plants were mostly planted on the edge of collection and main road. Estate management has also adopting pheromone trap for *Oryctes rhinoceros* population control purposes as seen in Division 3 Block E51 BRYE. Furthermore, estate management has also adopting *Tyto alba* for rat population control when currently has preparing on barn owl box installation which expected to be carried out on October 2018.

Prophylactic

In order to avoid P&D (include weeds) resistance and prophylactic uses of pesticide, estate management had substitute and/or rotate the use of pesticides for the same target, for example, in term of broad leaf control such as *Ageratum conyzoides*, *Boreiva alata* and *Mikania micrantha*, the use of Kixor 70 WG (Saflufenasil) could be substitute with Metafuron 20 WG (Methyl Metsulfuron).

4.5.2

In order to maintain workers knowledge and skills towards IPM, estate management has conducting several trainings, as follows:

- Training of integrated pest management has conducted in December 26th 2017, attended by 8 participants.
- Training and simulation of pesticide application has conducted in Division 3 Block B53 BRYE on August 14th 2018, attended by 22 participants from PT ASM.
- Training and simulation of pesticide application has conducted in Division 3 Block D53 BRYE on August 7th 2018, attended by 8 pesticide applicators.

Based on field observation and interview with Foreman and 3 Pesticide Applicators in Division 3 Block E53 BRYE, it could be concluded that the workers were able to explain and demonstrate its job in accordance with the SOP, such as justification of pesticide usage, considering wind flows during spraying, pesticide mixing, pesticides and its target, prohibited areas to be sprayed (for example HCV area and riparian zone, as well as PPE's to be used and its management.

Status: comply

4.6
Pesticides are used in ways that do not endanger health or the environment
4.6.1 and 4.6.3

Procedure No. BGAAGRKS-SOP-I dated January 4th 2011 Volume 3 and procedure No. BGAAGRKS- PTKS-PHT about

pest and disease mentioned that chemical application for pests and diseases population control has only allowed when the level of incidence has passed the threshold limit, as identified through census analysis, for example as follows:

- Based on *Oryctes rhinoceros* census in Division 1 BRYE on May 2018, it was known that incidence above economic threshold (>5 %) were identified in Block F54a and F55a. hence, carbofuran and cypermethrin were recommended by Agronomist on that particular blocks with dosage average active ingredient for about 12 kg/ha and 0.33 l/ha, respectively.
- Based on rat census in Division 1 BLRE on July 2018, it was known that incidence above economic threshold (>5%) were identified in Block 47a, F48a, G50A, H56a and H57a. Hence, Brodifacoum 0.005 was recommended with dosage average active ingredient for about 15.23 kg/ha.
- Apart from agrochemical application, estate management has adopting biological control through planting of beneficial plants (e.g.: *Turnera subulata* and *Antigonon leptopus*) for leaf eating caterpillar population control. As observed to estate field, it was known that beneficial plants were mostly planted on the edge of collection and main road. Estate management has also adopting pheromone trap for *Oryctes rhinoceros* population control purposes as seen in Division 3 Block E51 BRYE. Moreover, estate management has also adopting *Tyto alba* for rat population control when currently has preparing on barn owl box installation which expected to be carried out on October 2018

In order to avoid P&D (include weeds) resistance and prophylactic uses of pesticide, estate management had substitute and/or rotate the use of pesticides for the same target, for example, in term of broad leaf control such as *Ageratum conyzoides*, *Boreiva alata* and *Mikania micrantha*, the use of Kixor 70 WG (Saflufenasil) could be substitute with Metafuron 20 WG (Methyl Metsulfuron).

According to observation to pesticide warehouse and record of pesticide application, list of pesticide used by PT ASM, it could be concluded that all pesticide used were listed on Pesticide Commission Book 2016 and pesticide.id. furthermore, based on field observation and interview with Foreman and 3 Pesticide Applicators in Division 3 Block E53 BRYE, it could be concluded that the workers were able to explain and demonstrate its job in accordance with the SOP, such as justification of pesticide usage, considering wind flows during spraying, pesticide mixing, pesticides and its target, prohibited areas to be sprayed (for example HCV area and riparian zone, as well as PPE's to be used and its management.

4.6.2

Program of pesticide application was presented on annual budget. However, estate management mentioned that apart for weeding program, application of pesticide (insecticide, rodenticide, etc.) should be based on census analysis result and/or Agronomist recommendation. Based on review towards Pesticide Store and Estate management record, consumption recapitulation of pesticide in PT ASM during January to August 2018 were available. According to the record, it could be concluded that estate management has monitor and records the use of pesticides satisfactory. The LD-50 data was provided on the material safety data sheet (MSDS) which were available on the Pesticide Store.

4.6.4

Based on pesticide used records in 2018 which presented in Indicator 4.6.1 and 4.6.2, it could be concluded that there is no paraquat but there were pesticides listed in WHO Appendix 1B, e.g. Brodifacoum and Coumatetralyl. According to the ratbait record in 2017 and 2018, it could be concluded that estate management has significantly increase the use of ratbait for rat population control. Hence, the program of reduction has conducting through adoption of *Tyto alba* as natural rat predator. Installation of barn owl box was expected to be carried out on October 2018.

4.6.5

Procedure of chemical application (chemist works) is presented in procedure No. SOP BGAAGRKS- PTKS-PPS dated January 4th 2011 about pesticide management. Furthermore, PPE for pesticide applicator was explained in procedure No. BGA-SOP-CCS-1106.1-RO dated November 28th 2011. Procedure has covers working plan, completeness of work devices, mixing, technical spraying method, PPE to be used, as well as its management. In order to maintain workers knowledge, estate management has conducting several training for example as follows:

- Training and simulation of pesticide application has conducted in Division 3 Block B53 BRYE on August 14th 2018, attended by 22 participants from PT ASM.
- Training and simulation of pesticide application has conducted in Division 3 Block D53 BRYE on August 7th 2018, attended by 8 pesticide applicators.

Based on field observation and interview with Foreman and 3 Pesticide Applicators in Division 3 Block E53 BRYE, it could be concluded that the workers were able to explain and demonstrate its job in accordance with the SOP, such as justification of pesticide usage, considering wind flows during spraying, pesticide mixing, pesticides and its target, prohibited areas to be sprayed (for example HCV area and riparian zone, as well as PPE's to be used as well as its management. At the time of audit, there were no pesticide application in PRYE, BLRE and KKPA. Renew of PPE for pesticide applicators in these estates were still ongoing. Regarding this matters, estate management has encourage to ensure that the PPE provided were in accordance with MSDS of pesticide products. **OFI with observation**

4.6.6

PT Agro Sejahtera Manunggal established some procedures related to pesticides handling for examples chemical handling procedures ASM-SUST-SOP-14 on 2015. Field visit on BRYE, PRYE, and BLRE housing found there is no ex pesticides containers were used as flower pots and water containers.

Meanwhile field visit on BLRE housing found that one of those housing are being used as pesticides store. Procedure ASM-SUST-SOP-14 on 2015 are clearly states that all chemical store must be located far away from workers housing. Regarding this, company are not able to shown proper ways for pesticides storage based on current procedures. **Based on the explanation, raised the non conformance No 2018.06 with major category**

4.6.7

Procedure of pesticide application (chemist) is presented in document No. BGAAGRKS- PTKS-PHT about pest and disease and No. SOP BGAAGRKS- PTKS-PPS dated January 4th 2011 about pesticide management The procedure has covers application area targeting, pesticide needs calculation, applicators devices and preparation, mixing, safe application technique and PPE used.

Based on field observation and interview with Foreman and 3 Pesticide Applicators in Division 3 Block E53 BRYE, it could be concluded that the workers were able to explain and demonstrate its job in accordance with the SOP, such as justification of pesticide usage, considering wind flows during spraying, pesticide mixing, pesticides and its target, prohibited areas to be sprayed (for example conservation area and stream/riparian zone, which were marked with red paint on palm trunk) as well as PPE's to be used and its management. Pesticide applicators has also mentioned that pregnant and breastfeeding women are strictly prohibited to works related with agrochemicals. Furthermore, based on field observation to Pesticides Store in PRYE, BRYE and BLRE, it was found that all MSDS were available and match with pesticide stocks, symbols of risk and hazardous level, instruction and PPE used were displayed properly. Furthermore there are Pre mixing area as pesticide mixing and PPE's place located nearby Office Division. Moreover, as observed PRYE, BRYE and BLRE employees housing areas, it was known that used pesticide containers were not be able to be reused for domestic household purposes. Result of field visit and interview with workers obtained information if the food that carry out to the field stored in a special place and placed in areas that are not contaminated with chemicals

4.6.8

Based on field observation and information form estate management, it was informed that there were no pesticide application by plane through the air. All pesticides has applied through mist blower spraying and trunk injection.

4.6.9

Estate has conducting several continual training of pesticide handling and application, which aims to maintain workers knowledge and skills, for example as follows:

- Training and simulation of pesticide application has conducted in Division 3 Block B53 BRYE on August 14th 2018, attended by 22 participants from PT ASM.
- Training and simulation of pesticide application has conducted in Division 3 Block D53 BRYE on August 7th 2018, attended by 8 pesticide applicators.

The company has smallholders' scheme, but fully managed by PRYE unit. Based on interview with Foreman and 3 Pesticide Applicators in Division 3 Block E53 BRYE, it was known that the workers were able to explain and demonstrate pesticide handling technique such as storage of used containers on the Scheduled Waste Store, can't be reused for domestic purposes, PPE to be used and emergency action of pesticide incidence.

4.6.10

Company possess procedure for Toxic and Hazardous waste including ex agrochemicals management listed on procedures BGA-SOP-CCS-1101.1-R0. These procedure stated that all ex chemicals containers were kept on temporary hazardous storage at mill/estates.

Training for workers and staff regarding hazardous & toxic material handling have been conducted on August 2018, attended by BRYE, BLRE, PRYE, and PRYM representatives.

Based on interview with sprayer team found that workers recognized how to properly disposed waste materials and workers have been trained by company about waste and hazardous materials handling. Field visit during audit on toxic & hazardous waste storage on PRYM also found company showed proper ways for ex agrochemical disposal.

Field visit on BRYE, BLRE, and PRYE block spraying system acquired information that company has managed agrochemical containers by rinse them on isolated placed and regularly submitted to third parties contractors. Meanwhile, PPE for spraying team also stored on this block spraying system store.

4.6.11

Based on field observation, there's no evidence regarding to irritation on workers bodies caused by pesticide. Furthermore, based on the results of interviews with pesticide applicators in all estates, it was known that the company had carried out special health checks two (2) times a year and interviews with paramedic officers obtained information carried out in March 2018. Related to this evidence of implementation of health inspection activities and follow-up to the results of the health examination cannot yet be shown. **Based on the explanation, raised the non conformance No 2018.07 with major category**

4.6.12

The company had policy related to preventing pregnant and lactating women from dealing with pesticides on IOM (Intern Office Memo) No. 173/AC-IV/X/2013 dated 22 October 2013 about Policy of Child protection & Women workers, equal treatment and opportunity in employment opportunities, and freedom of association and assembly policies. The IOM explained that the BGA Management of the Group is committed to protecting the reproductive rights of women workers by strictly prohibiting female workers, both those with the status of permanent worker and contract worker during pregnancy and / or breastfeeding and / or are employed in jobs that use chemicals (pesticides / fertilizer). Based on interviews with operational staff and spraying workers and spray employee data review, there were no sprayers who were pregnant and breastfeeding.

Major 4.6.6	Status: non conformance No 2018.06 with major category	
Major 4.6.11	Status : non conformance No 2018.07 with major category	

4.7

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

4.7.1

Policy related to OHS namely Occupational Health and Safety signed by BGA Director on June 2013 and written in Indonesian Language. The policy explains that all worker have to obey, maintain, and implement the OHS in workplace. OHS committee is formed for monitoring the OHS implementation in workplace. Based on interview with workers known that they have been known about the OHS policy, for example workers are required use PPE while working and safe working practices. The plan related OHS has been prepared in the Occupational Safety and Health & Environment Work Program of 2018 and evaluates monthly if there is a plan program that has not been achieved (not yet realized).

However, based on the results of interviews with workers in POM, it was known that the company had carried out special health checks two (2) times a year and interviews with paramedic officers obtained information carried out in March 2018. Related to this evidence of implementation of health inspection activities and follow-up to the results of the health examination cannot yet be shown. **Based on the explanation, raised the non conformance No 2018.08 with major category**

4.7.2

Company has made the risk identification for each unit, BKYE, BLYE, PRYE, and PBRM (Updated 1 January 2018) in the document named HIRAC (Hazard Identification Risk Assessment and Control). The document identifies hazards, risk analysis and risk control in every upkeep activity (Pesticide spraying, fertilizer application, empty bunch application,

pruning midrib, etc.), harvesting activities, FFB transportation, all FFB processing activities (Weigh Bridge, Press Station, Sampling, Boiler Station, etc.) and General Activities (garbage disposal, generator and water pump machines, and security officers).

However, based on the results of the document review, it is known that there are several activities / activities in the field that have not identified potential hazards and risks, for example, but are not limited to:

- Potential Danger/Hazards for fertilizer storage activities
- Potential Danger/Hazard for activities in Chemical Warehouses / pesticides
- Potential Danger/Hazard for activity at the refueling site

Based on the results of field visits it was found that there were several risk controls that had not been implemented, for example:

- Found operators in sterilizer station, kernel station, boiler station, clarification stations do not use ear protectors
- Found security who smoked around the area of the Solar Tank in Bengkuang Raya Estate
- Found a dump truck driven by an unauthorized employee in Division 1 of Pembangunan Raya Estate (Unloading Workers).

Based on the explanation, raised the non conformance No 2018.09 with major category

4.7.3

The Company has established the OHS training program for the period of 2018. The training which has been conducted for example :

- Emergency Response and First Aid Training at BKYE on 8 August 2018
- Emergency Response and First Aid Training at PRYE on 9 August 2018
- OHS socialization on BRYE on July 25, 2018 attended by 53 employees.
- HIPERKES Training on 23 to 27 July 2018 for PT Agro Sejahtera Manunggal medical personnel on behalf of Kiki Arianti & Rizki Nur Andriansyah.
- Training of Class 1 Boiler Operators on August 6 to 11 2018 namely Ragil Pangistu, M. Nanang & M. Wahid Nurrohman.
- General OSH Expert Training on 17 to 28 July 2018 namely Desmon Hasudungan Sitinjak.

Based on interviews with 9 BSS workers and 4 harvesters on PT ASM stated that they get PPE free of charge from the company. Based on field observation in harvesting activity block A9, the workers had already used PPE based on risk analysis such as helmet, Boot shoes and gloves. The Company also shows the documents related to the provision of PPE in the document of PPE Monitoring Record. The document contains monitoring of grant and returns if any PPE are damaged.

4.7.4

The company has identified those responsible for implementation of OHS program formed in P2K3 (guiding committee of occupational safety & health) structure Estate and Mill (PT Agro Sejahtera Manunggal). P2K3 that owned has been approved by Labour Agency and Transmigration of West Borneo Province (No. 43/WASNAKER/2018) About Ratification of Provincial Safety and Health Provider (P2K3) Committee at PT. Agro Sejahtera Manunggal as of August 29, 2018. Secretary of P2K3 who is an OHS Expert in accordance with the applicable regulation has certificate of OHS Expert, in the name of Lavin D. Saputra (No. Reg. 44615/PK3/AJ/31/2017/P0, valid till October 23, 2020).

Besides that, meeting related OHS has been done monthly by P2K3, for example meeting on August 2018 with the agenda of discussion is about HIRAC Evaluation, Organization Structural evaluation, and evaluation of accident report data.

4.7.5

Company has made efforts to prevent emergencies and accidents. Company has procedures related to the handling of emergencies and accident investigation in SOP Emergency Response (ASM-SUST-SOP-25) dated 3 January 2017. Company has emergency facilities and infrastructure such as fire extinguisher, first aid kit, hydrant, water tank, and other supporting equipment. Based on field observation in mill for e.g. at boiler station known that hydrant are functioned

properly and the fire extinguishers there check and monitored every month (checklist of inspection provided in each fire extinguisher).

Based on field observation at Bengkuang Raya Estate, Belaban Raya Estate, Pembangunan Raya Mill, it is known that the contents of first aid box are available as determined by the company. As well as interviews with foreman of harvesting activity that foreman are also able to explain the function of each tool in the first-aid box. Monitoring first aid kit has been conducted regularly every month, if there is use of it must be noted on the form provided, and first aid kit that is used it must be replenished and reported Sustainability staff. The PIC of OHS also explained about the evacuation route in the Mill and Estate area before auditors start the field observation.

4.7.6

Company already had policies related to accident insurance on company policies (Period 2018-2020) specially on clause 23 about membership of the Employment Social Security Agency (BPJS) and clause 25 concerning health care insurance. The policies states that employees will be registered in the BPJS membership including JKK, JKM, JHT and JP programs. The amount of the BPJS TK premium for each program is determined in accordance with the provisions of the legislation. Participants in the trial period will be included in the BPJS TK program after the trial period ends. As long as it has not been registered, the employee's work accident insurance is fully borne by the company.

Health care guarantees are given to workers and their families. Types of maintenance guarantees, namely: outpatient treatment is given to workers based on class. Assurance of hospitalization is given to workers based on groups. Guaranteed delivery costs are given to the wife of the worker based on the group. The guarantee of the cost of buying glasses is given to workers by class.

Based on interview with spraying workers, harvester, office workers, they already provided with medical care. The company also showed proof of the insurance payment, for example :

- Evidence of BPJS Employment payment Belaban Raya Estate in June 2018 with payment code 180604331644.
- Evidence of BPJS Employment payment Bengkuang Estate units in June 2018 with payment code 180604213683.

4.7.7

Company already had recorded of work accidents in work accident analysis report and OHS performance rating for 2018 period. The summary of records tells about accident report calculated by lost time accident metric which results of ratio is Frequency Rate (FR) 14 and Severity Rate (SR) 7. Based on interview and document review, there's no major accident in the 2018 period, so the company still not claim the insurance.

Major 4.7.1	Status: non conformance No 2018.08 with major category	
Major 4.7.2	Status : non conformance No 2018.09 with major category	

4.8

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

4.8.1 & 4.8.2

Company has established a training program that is based on the identification of the training needs of workers to improve competence. The training program period in 2018 consist of technical training, training concerning OHS and environmental health, simulation and socialization associated with sustainability, for example:

- OHS General expert training
- Licensed first aid officer Training
- HIPERKES Training
- Transport Operator Training
- Electrical Technician Training
- Training of Welder
- Boiler Operator Training
- Waste Sample Officer Training
- Socialization and Fire Emergency Response Simulation
- Hazardous and Toxic Waste Management Training
- Pesticides Training

Training records for each worker are kept and recorded in the attendance list during the training. Examples of training

program realizations :

- Emergency Response and First Aid Training at BKYE on 8 August 2018
- Emergency Response and First Aid Training at PRYE on 9 August 2018
- OHS socialization on BRYE on July 25, 2018 attended by 53 employees.
- HIPERKES Training on 23 to 27 July 2018 for PT Agro Sejahtera Manunggal medical personnel on behalf of Kiki Arianti & Rizki Nur Andriansyah.
- Training of Class 1 Boiler Operators on August 6 to 11 2018 namely Ragil Pangistu, M. Nanang & M. Wahid Nurrohman.
- General OSH Expert Training on 17 to 28 July 2018 namely Desmon Hasudungan Sitinjak.

Based on interview with workers such as harvester, Manuring workers and spraying workers known that workers has been given training by company related their jobdescription.

Status: Comply

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

5.1

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

5.1.1

On 2010, PT. Agro Sejahtera Manunggal establish Environmental Impact Assessment (EIA) document covering estate activities for 7670 ha and mill capacity 45 mt FFB/hour. This EIA documents explained all activities for pre construction, construction, operation, and post operation covered the palm oil mill, bengkuang raya estate, belaban raya estate, pembangunan raya estate and KKPA Agro Seriam Mandiri. Company also obtained enviromental permit for this EIA, based on West Kalimantan Governor decree No 560/BLHD/2010 on December 13th 2010

5.1.2

Regarding Pembangunan Raya Mill capacity expanding from 45 mt FFB/hour to 60 mt FFB/hour, on 2018 company develop new addendum for EIA. This new EIA document covered an estate areas for 7670 ha, mill capacity 60 mt FFB/hour, and CPO port for 5,41 ha areas. Company also obtained enviromental permit for this EIA, based on Ketapang regent decree No 049/DPMPTSP-D.B/2018 on February 9th 2018. Company are conduct environmental management based on environmental management plan, for examples conduct regular surface water testing to prevent surface water contamination, conduct regular air emission testing to prevent air pollution.

5.1.3

Monitoring protocols for environmental management plan are listed on RKL/RPL implementation report document. These report described realization of monitoring and management of the environment in accordance with environmental parameters in the RKL/RPL. Public consultation with Ketapang Environmental agency indicates the company has established environmental management and there is no issue of pollution caused by the company's operational activities. Review for environmental monitoring / management plans have been developed on September 2018 and as the feedback of review, company has includes species monitoring plan for every month, starting since 2nd semester 2018. Based on field visit indications and document review found that company have monitored potential environmental impact, and as listed on regular RKL/RPL implementation report shown that result of monitoring are comply with standard regulation quality.

Status: Comply

5.2

The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced

5.2.1

PT. Agro Sejahtera Manunggal has conducted HCV asesment for the entire area of operations on 2011 by RSPO approved ALS assessor. The process of HCV identification conducted by using HCV identification guides in Indonesia on

June 2008. This HCV identification indicates there is HCV 1.1, 1.2, 1.3 1.4, HCV 4.1, and HCV 6 presence on PT ASM, covered for 102,64 ha areas. All of HCV attributes presence on company was mapped on 1:40000 scale, and this HCV identifications covered all estates/mill operational areas including surrounding landscape and RTE species.

5.2.2 & 5.2.3

HCV identification results also explain there is an critically endangered (CR) and endangered (EN) species according IUCN-Redlist V3.1 for examples *Shorea balangeran* (CR), *Manis javanica* (CR), and *Nasalis larvatus* (CR). To provide protection against such RTE species, management unit has made the hunting ban signboard, regular species monitoring and patrols, rehabilitation of riparian as habitat and report to relevant agencies ("Balai Konservasi Sumberdaya Alam"). Based on field visit on Bengkuang riparian block D38A division 1 (BRYE) shown the condition of riverine areas has been covered by natural vegetation. Interview with workers (harvester, manuring team, and manual upkeep) on BRYE also found that workers are recognized HCV area as a protected area and they also recognized no chemical applications policy on conservation areas. Workers also have deep understanding related to protected species, for examples hunting ban for protected species.

Related to RTE species, company have RTE species protections policy established on May 2018 by Area Controller. Evidence for workforce educations related to RTE species are available for examples HCV / RTE socialization on August 2018. Workers housing visit on BRYE, PRYE, BLRE also found there is no RTE / wild species reared by workers.

5.2.4

PT. Agro Sejahtera Manunggal have established HCV management plan for periods 2017-2018, and implemented it well. Regularly patrols record shown company has monitored illegal hunting, landfires, species presence, and other illegal activities. Records for regular patrols (every 2 months) on each estate are available and verified by auditors. For example patrols summary results on August 2018 for PRYE found "alap-alap" (*Falco berigora*), meanwhile wild species trap is not presence. The result of monitoring also reported to government institution every six month by regular environmental management implementation report.

Company have established 2017-2018 HCV management plan and Internal memo No 002/AM-SUST/05/2018 from Area Controller 7A clearly stated that HCV monitoring are conducted every month. Results of HCV monitoring for previous year (2017) indicates HCV attributes surrounding company area are maintained well, therefore it was concluded management plan for HCV was effectively implemented and HCV management plan for 2018 are still same with previous year. Current HCV monitoring were conducted every 2 months. Regarding this, company are not able to show proper HCV monitoring implementation based on HCV management plan and Area Controller internal memo. **Based on the explanation, raised the non conformance No 2018.10 with minor category**

5.2.5

Based on document verification found there is HCV 6 presence (sacred spot) on KKPA Agro Seriam Mandiri. Interview with Seriam Village public figure obtained information there is no HCV areas overlapped with local community right. All HCV areas including this HCV 6 areas are located on PT Agro Sejahtera Manunggal land use title right (HGU) areas.

Minor 5.2.4	Status: non conformance No 2018.10 with minor category
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5.3

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

5.3.1

Registry for waste (included toxic and hazardous waste) products that produced by mill and estates are identified and listed on waste identification document No 008/ASM-SUST/08/2018. For example ; hazardous waste were kept at temporary hazardous waste storage and housing/domestic waste are managed by landfill.

5.3.2 & 5.3.3

Company shown proper management ways for Ex chemical containers, medical waste, and other hazardous / non hazardous waste disposal, based on procedures ASN-SUST-SOP-52 on 2017 and based on waste management plan 2018. Inventory for all ex chemicals usage and it containers are available on PRYM temporary hazardous waste storage. Regarding hazardous waste storage, PRYM have temporary hazardous waste storage permit based on Ketapang Regent decree No 1491/DPMPSTSP-D.B/2017 valid until 2022.

Document review shown that PT. ASM has sent all hazardous waste to PT Bank Sampah Indonesia (licensed collector by decree of national environmental minister). Evidence for hazardous waste disposal are available, for examples manifest ARB0003729 for 707 kg ex chemical containers. Observation during audits at PRYM temporary hazardous & toxic waste storage shown that all of hazardous waste are compliant with storing periods in permit (< 365 days for non specific hazardous waste type II).

Related to domestic waste, field visit on BRYE, PRYE, and BLRE found that All settlements waste are not disposed off using open fire and companies managed settlements/housing domestic waste by provide landfill on each estate.

Status: Comply

5.4

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

5.4.1

PT ASM has assess and estimated the direct energy use such as fuel usage by Mill operational activities for 2017-2018 periods. Company shown commitment to reducing fossil fuel by renewable energy usage. Shell and fiber usage have been monitored per month and realization of fossil fuel usage during August 2018 are 6,964 litre. During Jan-August 2018, renewable energy usage for boiler resulting average energy efficiency about 113.26 Kwh/mt CPO, meanwhile direct energy usage by fossils fuel are 1.85 litre/mt CPO.

Status: Comply

5.5

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

5.5.1, 5.5.2

The policy without burning was explained in the Sustainability Policy, signed on 13-08-2015. The procedure for clearing land without burning is explained in the Agronomy procedure BGA-AGRKS-PTKS-PLH, signed on 27-05-2011. Based on field visits and interviews with representative local communities, including scheme smallholders, it is known that there was no indication of burning land. Land clearing conducted manually

Status: Comply

5.6

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

5.6.1

Sources of pollution activities including GHG emissions are: land use change, use of chemicals (fertilizers and pesticides), use of fuel oil, factory wastewater, FFB transportation, generators, and land fires.

5.6.2

The implementation of pollutant including GHG emissions mitigation such as: using chemicals (fertilizers and pesticides) according to recommendations from agronomist department, using fuel oil in line with the budget, managing wastewater in WWTP ponds, repairing FFB transportation machines regularly, repairing generator engines, forming fire fighting teams, equip fire extinguishers, land fire patrols, simulate land fires, calculate GHG and report the results of monitoring to relevant agencies.

Based on the document review of fire report on first semester (January – June 2018), it is known that there were no incidents of land fires. Land fires occurred on 09 & 10 August 2018 in block area B43A, B46A Block 2 BRYE and on August 2018 in the block area J70A, J71A, K68A Division 4 BLRE. Related to this, the company can demonstrated fire investigations, methods of fire extinguish and reporting to the relevant agency on 15-08-2018.

5.6.3

Pembangunan Raya Mill and supply base has calculated GHG emissions for period 2017, in 2018 there is an addition of new land tittle (HGU) covering 494.49 Ha. Summary of GHG emmison include LUC emission as follows:

Emmission per product	tCO ₂ e/tProduct
CPO	1.96
PK	1.96

Production	t/yr
FFB processed	220711.7
CPO produced	54038
PK produced	8861

Extraction	%
OER	24.48
KER	4.01

Land use	Ha
Planted area	17606
Planted on peat	2562.3
Conservation (forested)	104
Conservation (non-forested)	-

Summary of field emission and Sinks

Description	Own plantation		Group plantation		3 rd party	
	tCO ₂ e	tCO ₂ e/tFFB	tCO ₂ e	tCO ₂ e/tFFB	tCO ₂ e	tCO ₂ e/tFFB
Emissions Sources						
Land conversion	261136.12	0.51	10098.81	0.27	6512.73	0.41
CO ₂ emissons from fertilizer	4465.52	0.09	2312.85	0.07	742.95	0.05
NO ₂ emissions	11459.51	0.23	4752.03	2.08	693.51	0.04
Fuel comsumption	1492.46	0.03	506.86	0.01	299.52	0.02
Peat oxidation	46042	0.91	21059.68	0.51	0	0
Sinks						
Crop sequestration	-48718.46	-0.96	-21796.46	-0.58	-8565.99	-0.53
Sequestration in Conservation area	-229.25	0	-0.18	-0.01	0	0
Total	40647.48	0.8	16932.59	0.41	22088.63	-0.02

Summary of Mill Emissions and Credits

Emissions	tCO ₂ e	tCO ₂ e/tFFB
POME	37043.61	0.2
Fuel Consumption	673.56	0
Grid Electricity Utilisation	0	0
Credits	-	-
Export of Grid Electricity to Housing & Grid	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	30797.85	0.18

POME Treatment

Emissions	%
Divert to compost	0
Divert to anaerobic digestion	100

POME Diverted to Anaerobic Digestion

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

Auditor has been verified:

1. **RSPO PalmGHG Calculator version:** RSPO PalmGHG calculator V.3.01 applied
2. **Palm GHG calculation optional:** Apply Nov 2005 cut off for LUC applied
3. **Data inputs:** Data input have been verified and has been accurate.

Status: Comply

PRINCIPLE #6 Responsible consideration of employees and of individuals and communities affected by growers and mills
6.1

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

6.1.1

The company has conducted Social Impact Assessment (SIA) in collaborate with Forestry Department of Bogor Agricultural University dated on 2011, which result has been documented in Social Impact Assessment Report that covered all permit area 8,000 Ha. This assessment determining social impact caused company operational for surrounding villagers and employee of PT. ASM.

SIA report described several issues regarding to the social impact as follow: land ownership, environmental impact, social economy, and culture, employee, labor union and employee facility.

Based on interviews results with representative of the Seriam village community, it is known that the SIA has been prepared in a participatory manner, and all existing social impacts have been identified by the company.

6.1.2

SIA assessment has been conducted through the interview with all stakeholder, FGD and field observation. Interview with respondents attended by 29 villagers of Seriam Village and 21 employee. Besides that, FGD in has been conducted on April 22nd 2011 and attended by 92 participants. All participants were free to delivering their opinions.

Based on interview with representaives of the Seriam village community, the SIA was done with the participation of surrounding community.

6.1.3

Plans to reduce negative impacts are explained in the Social Management Plan (RKS of 2017). The company able to demonstrated actions to reduce negative impacts among others land completion by involving local communities, development of scheme smallholders, local business development, educational infrastructure assistance, foridly health facility for local community, provide electricity for community, provide clean water assistance, recruitment of local workers, etc.

6.1.4

The company able to demonstrated monitoring of negative impacts. The results of monitoring are known that all social aspect can be implemented properly, such as: developing of scheme smallholders and socialization of FFB prices, local business development, assistance for village education infrastructure, assistance to preserve local culture, assistance electricity for the community, providing clean water, recruitment of local workers and maintain workers housing facilities.

The social management and monitoring plan also has been reviewed attended by representatives from surrounding villages, PAD, CSR and Sustainability department. From the review, it was obtained social management and monitoring plan which then implemented in the work program of each department such as CSR department. CSR implementation is explained in **Criterion 6.11**.

6.1.5

Based on interviews with cooperatives management and scheme smallholders, it is known that scheme smallholders are included in the Social Impact Assessment and review of social management and monitoring plans (RKS & RPS).

Status: Comply

6.2

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

6.2.1

Communication and consultation procedures are explained in the communication procedure with no. ASM-SUST-SOP-08-R1, Revision No. R1 on 14-02-2017. The procedure has been socialized to stakeholders on 25-02-2017 by the CSR Department and Sustainability Department. The company also has a communication forum by involving stakeholders (Strategic Social Handling Forum).

6.2.2

The person responsible for the company to conduct communication and consultation to stakeholders is the staff of PAD (Public Affair Development) or Public Relations (Mr. Pedi Griyanto) in line with Decree No. 012 / SK / ASM-MBNR / VII / 2018, signed January 2, 2018. From the PAD staff, submit to the relevant departments such as the Sustainability Department, CSR Department, etc.

Interviews with relevant stakeholders, it is known that they already know the Communication and Consultation Personal In Charge is PAD Staff (Mr. Pedi Griyanto) and assisted by other departments.

6.2.3

List of stakeholders available. The company can demonstrated records of communication with external stakeholders, described in the External Communication Book. In 2017-2018 there were 15 documented communications has responded, for example communication in April 2018 between the company and police of Ketapang district related to clarifying land claims.

The company can demonstrated records of communication with internal stakeholders. In 2018 there were 4 complaints that the company had responded to, for example:

- Complaints from workers regarding the government health insurance card on 08-05-2018. The complaints have been responded on 12-05-2018
- Complaints from workers regarding the color of the dull house walls on 06-07-2018. The complaints have been responded on July 2018.

Status: Comply

6.3

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

6.3.1

The company has the procedures of Grievances Resolution with no. SOP-BGA-SOP-HC-311-1-R0, that approved on April 25th 2012. This procedure explain about the process of delivering and handling of complaints and grievances from both internal and external. In the procedures also mentioned that the company guarantees the anonymity of the reporting and the revealer of the case (*whistleblower*).

Protection policy for whistle blower also stated in sustainability policy that published on August 13th 2015. Through this policy stated that *"We strive to amicably resolve conflicts and complaints with all parties in an open, transparent and constructive manner through our complaints and whistleblowing procedures, in addition to the RSPO complaints mechanism. Significant non-compliance of this policy will be monitored and reported to the company's Board. The corrective measures taken, where appropriate, will be publicly reported"*.

6.3.2

The company can demonstrated communication records with external stakeholders including workers, described in the "external communication book". In 2017-2018 there were 15 documented communications has responded, for example communication in April 2018 between the company and police of Ketapang district related to clarifying land claims. Based on internal review with government agency and local community, they are known mechanism to complaint (if any).

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.

The company has had procedure of Indemnity of Planting and Area (*Ganti Rugi Tanam Tumbuh dan Lahan*, SOP – PAD -001 Revisi 001 dated 3 January 2017) which aims to create a standard in the process of compensation for crops and land throughout the BGA Group operational area and minimize errors in the implementation of compensation and land to save the company's assets

The results of interviews with representatives of Village Seriam, community leaders, cooperative ASM, obtained information if that the entire operational area of the company had been compensated. The compensation process involved all community witnessed also by the Village Head, Dayak Customary leader of Seriam Village, Subdistrict head of Kendawangan, Kendawangan Sector Police and Ketapang Regency's staff of plantation agency. The compensation process is based on the basis of consultation and negotiations are transparent and meet the demands for social justice. The results of the verification document can be shown on the document of the acquisition of land rights shown by the company in the document *REKAPITULASI PERMOHONAN DANA GRIT – WILAYAH VII* "for the period 2008 - 2015 with a total area of 6,725.66 hectares, to 480 households. Until the audit was carried out, there was no written complaint from the community regarding the land dispute. However

Status: Comply

6.5

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

6.5.1

Company showed appointment letter of permanent daily worker, such as:

- Letter No.:003/ASM-BRYE/SK/VIII/2018 dated August 2018
- Letter No.:003/ASM-BRYE/SK/II/2017 dated January 2017

The letter explain that wages payment is in accordance with available regulation (based on West Kalimantan Governor Decree No. 706 / DISNAKERTRANS / 2017 about minimum wage of plantation sector for Ketapang District). The minimum wage is Rp 2.562.000.

There are couple of workers type in the company, here's the list:

- PTB (*Pekerja Tetap Bulanan*) : Monthly Permanent Worker
- PTH (*Pekerja tetap Harian*) : Daily Permanent Worker

The company wage regulation for 2018 is described like this:

Status	Wage	Rice Allowance		
		Worker (kg/Day)	Wife* (kg/Day)	Child** (kg/Day)
PTH	Rp 2.562.000,-/month	0,50	0,30	0,25
PTB	Based on class, monthly wage structure***	0,50	0,30	0,25

*) The legal wife of the worker and does not work, lives on the plantation (business unit)

**) Those who are eligible are a maximum of 2 childrens living on the plantation (business unit).

***) Monthly employees starting from the lowest group (P1) Rp. 2.582.000.

The company also had the latest salary list documents for employees such as the August 2018 payroll for PRYE, PBRM, BLRE, and BKRE units. The salary list describes the income which consists of basic salary, premiums, overtime, allowances, harvesting premiums. Pieces consist of Social Security, PPh21, debt, etc. The results of interviews with workers in company operation area and contractor known that the wages of workers have been in accordance with the prevailing minimum wage.

6.5.2

Company has company regulation period of 2018 – 2020. This regulation has conformed to the applicable manpower regulation in Indonesia and has been written in Indonesian Language. It explains about company and workers duty and rights, including the Retirement Age. It explained that the workers who will be retired, will receive their rights in accordance with the provisions of applicable law.

Based on interview with labor union and management, Collective Labour Agreement has been explained to the workers. The workers (spraying team, harvester, office workers, operators) also know about their rights and obligations, such as equality rights or health rights.

However, based on the results of the review of the employee premium list document and payroll in June & July 2018 it is known that there are workers who work on holidays / weekend. Related to this, the company has provided compensation in the form of overtime / premium with varying values for example

- Finding wood activity with overtime compensation of 1 workdays (Rp. 102,480)
- Security officer with 8 hours of compensation paid Rp. 195,145, -

Meanwhile in the Minister of Manpower and Transmigration Decree no. 102 of 2004 concerning Overtime and Overtime Work Wages, clause 11 on how to calculate overtime wages, section (b) which states: "If overtime is done on weekly rest days and / or official holidays for 6 (six) working hours working days 40 (forty) hours a week then (b.1.) calculation of overtime wages for the first 7 (seven) hours paid 2 (two) times wages, and the eighth hour paid 3 (three) times wages an hour and overtime ninth and tenth are paid 4 (four) times an hour. **Based on the explanation, raised the non conformance No 2018.11 with major category**

6.5.3 & 6.5.4

Based on field observation in Pembangunan Raya Estate, Belaban Raya Estate and Bengkuang Raya Estate, it is known that the company has been providing housing facilities, lighting, water, daycare, cooperatives, worship place, school buses, clinics and educational facilities. Company also facilitates all workers to access adequate food supply by establishing mini market named "Bumitamart". Moreover, there are some kiosk in housing complex. Personnel can get the staple food with reasonable price. The Company also provides rice support to all permanent worker.

However, based on the results of a field visit in the housing of PRYE, BLRE and BKRE employees, the condition of the drainage ditch was found to be inadequate (experiencing siltation) and found domestic waste which was placed not in its place (dumped into drainage). Meanwhile in the domestic waste management procedures owned by the company (No. Doc: ASM-SUST-SOP-47) where in clause 7.3.1 explains "All employees and workers in housing, offices and other work facilities are required to dispose of garbage in bins that have been provided." **Based on the explanation, raised the non conformance No 2018.12 with minor category**

Minor 6.5.2	Status: non conformance No 2018.11 with major category	
Major 6.5.3	Status: non conformance No 2018.12 with minor category	

6.6

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

6.6.1 & 6.6.2

Based on the results of the document review, the company has policies related to freedom of association in the Company Policies Period 2018-2020, especially in clause 21 about Bipartite forum, which consist:

- Companies and workers jointly hold bipartite forums.

- The composition of the membership and the time of the bipartite forum meeting refers to the applicable labor regulations.

The company also had Worker Union of PT Agro Sejahtera Manunggal which has been registered with the Manpower and Transmigration Agency of Ketapang District on March 29, 2018 (No.046/2018) with no. Registration 183 / OP-SBTP / SPM-PT. ASM / DFT / 2018.

Based on interview with worker union there's no intervention by Company, every workers has rights to choose representative in bipartite.

One of the meeting documents record shown by the company was the meeting of the formation of the PT ASM Independent Workers' Union on February 20, 2018 which was also attended by company representatives (estate managers and field assistants).

Status: Comply

6.7

Children are not employed or exploited.

6.7.1

Company has policy about the minimum age for worker written on the company regulation of PT Agro Sejahtera Manunggal Period 2018-2020 especially in Clause II concerning Employment Relations explained that the general requirements that must be fulfilled by each prospective new employee are:

- Indonesian citizens
- Minimum age of 18 years and a maximum of 45 years at the time of acceptance and or when appointed as a permanent worker.
- Meet the required criteria and job requirements.
- Willing to comply with the rules and regulations that apply in the company.
- Not involved in activities or organizations that are prohibited by the government.
- Not in criminal proceedings

Based on field observation and interview with workers, it is known that the workers have known about the minimum age is 18 years for new workers. Auditors also did not sighted any harvester accompanied by their wife or children.

Status: Comply

6.8

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

6.8.1, 6.8.2 & 6.8.3

The Company has policies related to equal opportunities and treatment to obtain employment opportunities in the Office Memo Internal Document (No.:001/ASM-SUST/V/2018) concerning Child Protection Policy and Women Workers, Same Policies and Opportunities in Employment Opportunities (Human Rights) and the Association and Gathering Policy which is valid on 31 May 2018. The policy explains among others:

- BGA Group management prohibits the employment of children under age (less than 18 years) working or employed which can endanger the safety, health and morals of children. This also applies to contractor workers.
- BGA Group management is committed to protecting the reproductive rights of women workers by strictly prohibiting female workers, both PTH, PTT and contract workers who, during pregnancy and / or breastfeeding, work and or are employed using chemicals (pesticides / fertilizers) if there are pregnant workers in place the work can be done in the form of transfer or transfer to other work that is not related to chemistry.
- BGA Group management protects every workers from all forms of violence and sexual harassment.
- BGA Group management provides equal opportunities and treatment by not differentiating race, ethnicity, religion, nationality, disability, gender, sexual orientation, union membership, and political affiliation

The company has an appointment letter for new recruitment employee on 2018, for example the Employee Appointment Letter (No.:003/ASM-BRYE/SK/VIII/2018) on August 1, 2018 for permanent worker (harvesting).

The results of interviews with workers, worker unions, gender committees, cooperative managers are known that in the recruitment process there are several requirements that must be met, such as identity cards, CVs, family cards, health examination results etc. In addition, workers are also given training related to their job description to improve the skills / expertise of workers. So that workers who are appointed or recruited already have the expertise / ability in accordance with the job description.

Based on interview with women worker in Pembangunan Raya Estate, Bengkuang Raya Estate and Belaban Raya Estate, it is known that there is no issue regarding discrimination. The workers that has been interviewed is came from various social origin, race, and religion. Local community also get the same opportunity to work in company.

Status: Comply

6.9

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

6.9.1; 6.9.2; 6.9.3

Company has a policy to prevent all forms of sexual harassment and violence in the Sexual Harassment procedure number BGA-SOP-HC-311.2-R0. The procedure describes documentation of complaints, handling victims, protecting victims, witnesses and perpetrators, investigating and sanctions. The policy has been socialized to the worker in each unit through Gender Committee. Gender committee function is to handle the protection of female workers rights. Based on interview with gender committee of PT ASM, company provided daycare for all workers' children and also give maternity and menstrual leave for female workers.

In addition, on IOM (Intern Office Memo) No.: 175/AC-IV/X/2013 dated October 22, 2013 also inform about Company responsibility related to women worker work at night. The policy describes:

- Unit manager are prohibited from employing pregnant women employees who according to doctors' information is harmful to their health and safety and if they work between 11:00 p.m. to 07:00 a.m.
- Unit Manager who employ female employees between 11:00 p.m until 07:00 a.m. are obliged to provide nutritious food and drink (fulfill 1,400 calories) given directly, maintain decency and security during the workplace.
- Unit Manager are obliged to provide shuttle transportation for female employees who leave and go home from 11:00 p.m to 05.00 a.m.

Certificate holder also has procedure for handling the complaint No. ASM-SUST-SOP-40, on 3rd January 2017. It explain about the mechanism of handling the complaint from external and internal party. Company also has a mechanism to protect the identity of complainant (whistleblower). The worker can make complaint through complaint channel by phone, SMS or email. The mechanism has socialized to the worker through signboards all over the unit. Based on interview with worker in estate and mill, they all know the mechanism to make a complaint.

Status: Comply

6.10

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

6.10.1

The company has partnered with local community in the development of scheme smallholders under the Agro Seriam Mandiri Cooperative. The company (factory) purchases FFB form scheme smallholders with a price that refers to the Plantation Agency of West Kalimantan Province. For example price in the period June 2018, for planting year 2009 IDR. 1534.87, planting year 2010 IDR 1488.98, planting year 2011 IDR 1435.73 ha, and planting year 2012 IDR 1395.64.

6.10.2

FFB price information has been socialized to cooperative and scheme smallholders, for example on January 12, 2018 (attendance list and photo activity available).

6.10.3

Contract agreement between companies and cooperatives are available. Based on interviews with management of cooperative and scheme smallholders, it is known that contract agreements are fair, legal and transparent.

6.10.4

Based on interviews with management cooperatives and scheme smallholders, it was known that there were no

complaints related to FFB prices, payments were made on time and in line with the prices set by the government.		
	Status: Comply	
6.11		
Growers and millers contribute to local sustainable development wherever appropriate.		
6.11.1		
Contributions to local development are explained in the PAD Monthly Reports and CSR Reports. The contribution is based on consultation with the local community and the results of social impact analysis (SIA document). Contributions to local development such as: land completion by involving rural communities, development of scheme smallholders, socialization of FFB prices, local business development, educational infrastructure assistance, health education to the community, financial assistance and participation for local culture, electricity for the community, provide clean water assistance, recruitment of local workers, etc.		
6.11.2		
The company and scheme smallholders already have a cooperation agreement for the development of scheme smallholders. To increase the productivity of scheme smallholders, the company (PRYE) carries out a full management base management practices.		
	Status: Comply	
6.12		
No forms of forced or trafficked labour are used.		
6.12.1; 6.12.2; 6.12.3		
Based on document review, field observation, and interview with workers and stakeholders revealed that there is no migrant worker, forced labor, and illegal worker. Also, there is no contract substitution in the company. Each worker have appointment decree letter as daily or monthly permanent worker. Identity document of each worker is kept in unit office and if they want to access their document, they have to communicate it with their supervisor.		
Based on document review, field observation, and interview with workers and stakeholders, auditors did not see any harvester accompanied by their wife or children and any indication of force labour. There is no threat againsts family members.		
	Status: Comply	
6.13		
Growers and millers respect human rights		
6.13.1		
The Company has policies related to equal opportunities and treatment to obtain employment opportunities in the Office Memo Internal Document (No.:001/ASM-SUST/V/2018) concerning Child Protection Policy and Women Workers, Same Policies and Opportunities in Employment Opportunities (Human Rights) and the Association and Gathering Policy which is valid on 31 May 2018. The policy explains among others:		
<ul style="list-style-type: none"> - BGA Group management prohibits the employment of children under age (less than 18 years) working or employed which can endanger the safety, health and morals of children. This also applies to contractor workers. - BGA Group management is committed to protecting the reproductive rights of women workers by strictly prohibiting female workers, both PTH, PTT and contract workers who, during pregnancy and / or breastfeeding, work and or are employed using chemicals (pesticides / fertilizers) if there are pregnant workers in place the work can be done in the form of transfer or transfer to other work that is not related to chemistry. - BGA Group management protects every workers from all forms of violence and sexual harassment. - BGA Group management provides equal opportunities and treatment by not differentiating race, ethnicity, religion, nationality, disability, gender, sexual orientation, union membership, and political affiliation. 		
Based on interview with local contractor, worker union and committee gender, it is known that they already understand about the policy. Interview with worker in estate and mill informed that there is no complaint related to violation of human rights.		
	Status: Comply	
PRINCIPLE #7 Responsible development of new plantings		

7.1 A comprehensive and participatory independent social and environmental assessment is undertaken prior to establishing new plantings or operations, or expanding existing ones, and the results incorporated into planning, management and operations.
7.1.1 The company conducted new plantings after November 2010. Related to this the company has analysis the environmental and social impacts in December 2010. Social impact has been explained in indicator 6.1.1 and Environment impact has been explained in indicator 5.1 7.1.2 The management and monitoring plan related to social and environment impact including the implementation record has been explained in indicators 5.1.2 and 6.1.2 7.1.3 Based on interviews with cooperatives management and scheme smallholders, it is known that scheme smallholders are included in the Social Impact Assessment process and reviewing the social impact management and monitoring plan (RKS-RPS). This has been explained in the indicator 6.1.5
<div> <div></div> <div>Status: Comply</div> <div></div> </div>
7.2 Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.
7.2.1 The company shows land suitability map which derived from soil survey in August 18 th 2015. Based on soil sustainability map review, it could be concluded that main limitation in PT ASM was mainly due to very low fertility, followed by drainage problem, soil depth and texture which may need to be recover through nutrient supply and installation a proper drainage system. Furthermore, estate management has also presenting description of soil type which explained in Indicator 4.3.1. 7.2.2 Based on Slope Map Scale 1:150,000, it was informed that in general, slope condition in PT ASM and KKPA ASM were dominantly flat to undulating 99.90 % while there was a very small portion of rolling area. Main limitation on this flat areas was presence of low land areas which prone to flooded. To overcome this situation, estate management has installing field drain system with ratio 1:4 and 1:8. This field drains has also adopted to enhance soil pH on peat and acidic sulfate areas through water discharge/flushing. Furthermore, in order to minimize surface run-off on sandy soil areas, U-shape frond stacking and EFB mulching has also adopted by estate management. Furthermore, based on observation to PRYE, KKPA ASM, BLRE and BRYE, it was known that cover crop condition by <i>Mucuna bracteata</i> and <i>Nephrolephis bisserata</i> were considered satisfactory.
<div> <div></div> <div>Status: Comply</div> <div></div> </div>
7.3 New plantings since November 2005, have not replaced primary forest or any area required to maintain or enhance one or more High Conservation Values.
7.3.1 and 7.3.2 Document review found that company are perform land clearing after November 2005 without preceded HCV assessment. Regarding this, company shown LUCA, that covered 5,630 ha areas on 2016. Meanwhile audit scope for this ST-2 assessment are ±7085.49 Ha, therefore there is ± 1,455.49 Ha areas were not included on current LUCA. Company are not able to shown land use change analysist for entire operational areas (±7085.49 Ha) for areas that developed/cleared without preceded HCV assessment since 2005 and RaCP that approved by RSPO. Based on the explanation, raised the non conformance No 2018.13 with major category 7.3.3 Based on the results of interviews with management is known that the initial activity of land clearing was conducted on

2009. Since 2013, there has been no new land clearing or expansion of operational areas undertaken by the management unit.

7.3.4 and 7.3.5

The results of document review, field visits and interviews found that CH did not expand or conduct new planting since 2013. HCV management plan for existing operational areas are able to seen on criteria 5.2

Major 7.3.1	Status: non conformance No 2018.13 with major category
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7.4

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

7.4.1

The company has soil map with scale 1:50,000 which derived from soil survey conducted by Research Department on August 18th 2015. Based on soil map review, it could be concluded that there were fragile soils within estate operational areas, as shows through the presence of peat soil, mineral acidic sulfate and very sandy soil texture. However information of soil condition in KKPA ASM was included on PYRE areas. Furthermore, there were also presence of marginal soils through peat (developed), mineral lateritic and alluvial. Thus, main limitation of PT ASM operational areas were due to acidic soils, very sandy soil texture and low fertility.

7.4.2

Strategy of estate management on fragile areas is presented in document No. SOP BGAAGRKS- PTKS-PLH dated January 4th 2011 about land preparation, No. SOP BGAAGRKS- PTKS-KTA dated January 4th 2011 about soil and water conservation and No. SOP BGAAGRKS- PTKS-PKS about oil palm planting. Estate management had implementing several strategies which aims to overcome several limitation due to presence of fragile and marginal soils, as follows:

- To conduct water management through installation of flapgate and drainage system on the main road, collection road and field drain, especially on peat and very sandy soil areas.
- To conduct EFB mulching as shown in Division 1 Block F56 BLRE, Division 3 Block BRYE and Division 4 Block B26/27 PRYE. Dosage recommended was 28 ton/ha/year which applied in two rotation. EFB mulching was prioritize to be conducted on very sandy soil area, stacked on the inter palm and the edge of harvesting path.
- To conduct land application as shown in Division 2 Block 42B BRYE. Dosage recommended by the agronomist was 750 m³/year, divided into three rotation.
- To conduct U-shape fronds stacking and planting of cover crop has also considered as biomass cycle on the field, which could be release additional nutrient K.
- To conduct fertilizer application as recommended by Department of Research, and conducting selective weeding which aims to minimize nutrients uptake competition with weeds.

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.

7.5.1

The company has had procedure of Indemnity of Planting and Area (*Ganti Rugi Tanam Tumbuh dan Lahan*, SOP – PAD -001 Revisi 001 dated 3 January 2017) which aims to create a standard standard in the process of compensation for crops and land throughout the BGA Group operational area and minimize errors in the implementation of compensation and land to save the company's assets

The results of interviews with representatives of Village Seriam, community leaders, cooperative ASM, obtained information if that the entire operational area of the company had been compensated. The compensation process involved all community witnessed also by the Village Head, Dayak Customary leader of Seriam Village, Subdistrict head of Kendawannan, Kendawangan Sector Police and Ketapang Regency's staff of plantation agency. The compensation process is based on the basis of consultation and negotiations are transparent and meet the demands for social justice. The results of the verification document can be shown on the document of the acquisition of land rights shown by the company in the document *REKAPITULASI PERMOHONAN DANA GRIT – WILAYAH VII* "for the period 2008 - 2015 with a total area of 6,725.66 hectares, to 480 households. Until the audit was carried out, there was no written complaint from

the community regarding the land dispute. However		
	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.		
7.6.1; 7.6.2; 7.6.3		
<p>The company has had procedure of Indemnity of Planting and Area (<i>Ganti Rugi Tanam Tumbuh dan Lahan</i>, SOP – PAD -001 Revisi 001 dated 3 January 2017) which aims to create a standard standard in the process of compensation for crops and land throughout the BGA Group operational area and minimize errors in the implementation of compensation and land to save the company's assets</p> <p>The results of interviews with representatives of Village Seriam,community leaders, cooperative ASM, obtained information if that the entire operational area of the company had been compensated. The compensation process involved all community witnessed also by the Village Head, Dayak Customary leader of Seriam Village, Subdistrict head of Kendawanngan, Kendawangan Sector Police and Ketapang Regency's staff of plantation agency. The compensation process is based on the basis of consultation and negotiations are transparent and meet the demands for social justice.</p> <p>The company has been shows the evidence of land compensation to related party. The sample of process land compensation present to land owner was sighted, The copy was made in Bahasa and known by all relevant parties. Although the legal status, acquired land is located within the Land Use Title area of the company, which is in the law the company is controlled legally. These process was involve of land owner and approved by head of village and head of sub district. The documented process of land compensation was signed by related party, filed in each estate.</p> <p>Freedom to access information is explained in the Communication Procedure (Document No. ASM-SUST-SOP-08-R1, Revised No. R1 on 02-14-2017). Information that can be accessed by stakeholders such as: HGU, AMDAL, UKL / UPL documents, RKL / RPL, HCV, SIA Reports, etc. The communication procedure has been socialized to the public on February 25, 2017 by the CSR Department and Sustainability Department. The company also has a communication forum involving the community, namely the S2H (Strategic Social Handling Forum).</p> <p>Interviews with the representative community including indigenous community leaders, it is known that the company has communicated and consulted them regarding the planned opening of the plantation. The company has also paid compensation for community land in line with the agreement.</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.		
7.7.1, 7.7.2		
Policies without burning and implementation have been explained in criterion 5.5		
	Status: Comply	
7.8		
New plantation developments are designed to minimise net greenhouse gas emissions.		
7.8.1, 7.8.2		
Identification of greenhouse gas emission sources and mitigation measures including the calculation of GHG emissions in 2017 have been explained in Criterion 5.6.		
	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.

Continuous improvement action plan undertaken by the company include the development of insect pollinators elaidobius camerunicus. The breeding of insect pollinators is expected to assist in the formation of the fruit in order to reach the optimal FFB production. Companies also use sex pheromones as attractants to attract pollinating insects to pollination and fruit formation can be optimized. Based on pesticide used records in 2018 which presented in Indicator 4.6.1 and 4.6.2, it could be concluded that there is no paraquat

The company carried out the RSPO internal audit held on 16 – 19 July 2018 with an internal team of auditors from the Sustainability department . As a follow up to the results of the internal audit, the management unit carried out a management review meeting on 07 Auguts, 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>Organization that conduct physically handled of RSPO product is Certificate Holder of Pembangunan Raya POM and transporter. It will be verify during ASA-1. Pembangunan Raya POM didn't buy CPO from others sources.</p>
	Status: Comply
5.1.2	<p>Traders and distributors require a license obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model.</p> <p>The mill does not buying certified product from RSPO licensed traders, entire product sold to buyer are from its own unit.</p>
	Status: Comply
5.1.3	<p>Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform.</p> <p>The parent company of PT Agro Sejahtera Manunggal are Bumitama Agri Ltd is a member of the RSPO since 08 October 2007, with registration Number 1-0043-07-000-00</p> <p>Pembangunan Raya Mill has been registered in palm trace with number ID RSPO_PO1000004866</p>
	Status: Comply
5.1.4	<p>Processing aids do not need to be included within an organization's scope of certification.</p> <p>The mill does not have any processing aid neither material nor equipment.</p>
	Status: Comply
5.2	Supply chain model
5.2.1	<p>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.</p> <p>The organization will apply Mass Balance Supply Chain Model. The implementation will be verified at ASA 1.</p>
	Status: Comply
5.2.2	<p>The site can use one (1) or a combination of supply chain models as audited and certified by the CB.</p> <p>The organization will apply Mass Balance Supply Chain Model. The implementation will be verified at ASA 1.</p>
	Status: Comply
5.3	Documented procedures

5.3.1	<p>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.</p>
	<p>Pembangunan Raya POM has a procedure for implementing the SCC requirements in the document of product identification and traceability, document no. ASM-SUST-SOP-43 revision 01 dated 24 Nov 2017, the procedure of SCC has been referred to new SCC standard and system. In procedures describing rules related to SCC implementation, the personnel involve and responsibilities such as commercial departments, sustainability regions, mill managers and OQC Dept.</p> <p>In addition, has been described in the procedure related to the identification of the raw material (clause 7.1.1), since from field and recorded in delivery consignee (vehicle number, driver, estate, division, departure time, destination, block, planted year, loose fruit weight, number of bunches, field number) and FFB identification at reception at POM (security post and weigh bridge). Also explained that the identification of raw materials derived from certified areas and non-certified areas is by marked with CSPO logo on consignee note.</p> <p>In clause 7.3 it is explained that the sustainability region is responsible for informing the production of excessive certified products to CB and clause 7.6 mentions that management review is conducted once a year. In the SOP annex there are RSPO team structure of PT ASM and details of duties and responsibilities respectively.</p>
	<p>Status: Comply</p>
5.3.2	<p>The site shall have a written procedure to conduct annual internal audit</p>
	<p>The procedure number ASM-SUST-SOP-39 (internal audit), revised on 28 Oct 2017, the SOP are covering RSPO-SCCS, RSPO P&C, ISPO, ISCC, ISO and OHSAS. In the section of procedure (section 6) mentioned that internal audit are conducted once a year.</p> <p>SCCS Internal audit report 2018 conducted on 18 July 2018. Results of internal audit its known if there is one (1) non-conformity identified related to supply chain management system its about Management Review</p>
	<p>Status: Comply</p>
5.4	<p>Purchasing and goods in</p>
5.4.1	<p>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</p>
	<p>Pembangunan Raya POM has no selling or buying RSPO certified product yet. This matter will verify at ASA 1.</p>
	<p>Status: Comply</p>
5.4.2	<p>The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents</p>
	<p>Mechanism to handling and control nonconformance product are described in SOP no.: ASM-SUST-SOP-51, regulating among others controlling / handling of raw materials received (FFB), product identification in process, control of final product to be shipped to buyer and controlling/handling the improper document.</p>
	<p>Status: Comply</p>
5.5	<p>Outsourcing activities</p>
5.5.1	<p>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.</p>
	<p>There was certified product transportation from mill to the buyer which involving third parties who have been contracted by PBRM, can be shown the contracts:</p>

- PK delivery document number 395/LO/CD-HO/VII/18 by PT Suri Adidaya Kapuas
- CPO delivery document number 532/LO/CD-HO/IX/18 by CV Kawira Putra

In the additional sections it is explained that the contractors is willing to be verified by CB during supply chain audit

Status: Comply

5.5.2

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

- The site has legal ownership of all input material to be included in outsourced processes;
- The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.
- The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.
- 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

in the contract document stated that all product is legally owned by PT ASM, the transporter only responsible for transporting to the destination in stated in delivery document and explained that the contractors is willing to be verified by CB during supply chain audit

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.

Yes, the company has had document already describes the information of the contractor including address:

- CV kawira Putra (CPO) located In Kendawannan, Kapatang Regency, Kalimantan Barat
- PT Suri Adidaya Kapuas (PK) located In Kendawannan, Kapatang Regency, Kalimantan Barat

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

Yes, it will be observed in the next ASA (recert).

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

Pembangunan Raya POM has no RSPO certified product yet. This indicator will verify at ASA 1.

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

Pembangunan Raya POM has no transaction on RSPO IT Platform yet. It will be verified at ASA 1.

	Status: Comply
5.7.2	<p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:</p> <ul style="list-style-type: none"> 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.
	The actions following in The RSPO IT Platform will verify at ASA 1.
	Status: Comply
5.8	Training
5.8.1	<p>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</p>
	In the SOP of product identification and traceability explained that SCCS related training is provided to all staff and employees involved. The training program is planned once a year.
	Status: Comply
5.8.2	<p>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</p>
	<p>Yes, training of SCCS has been conducted regularly, for example in 2018:</p> <p>Training to personnel of estates who involved in the SCCS implementation was conducted on 07 Augusts 2018 with the number of participants are 10 persons, related to the use of CSPO logo in FFB delivery document and related to re-affirmation of certified and noncertified area.</p> <p>Based on field visit on Pembangunan Raya Mill, acquired information that PIC for SSCS implementation (for examples weight bridge operators, security, and "Kepala tata usaha") that training of supply chain management system were carried out annually. Results of field visits and interview with weighbridge operator obtained information if the know about RSPO SCCS, the use of CSPO Logo and etc.</p>
	Status: Comply
5.9	Record keeping
5.9.1	<p>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</p>
	Pembangunan Raya has no certified product yet. All Records will be verified at ASA 1
	Status: Comply
5.9.2	<p>Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory</p>

requirements and be able to confirm the certified status of raw materials or products held in stock									
In SOP (clause 6.1) it is explained that all SCCS records are stored within 5 years. Pembangunan Raya has no certified product yet. All Records will be verified at ASA 1									
	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.									
Pembangunan Raya POM has kept all the SCCS implementation records for more than 12 months. The document storage period described in the SOP is for 5 years.									
During this audit, Pembangunan Raya has not been certified. The estimated product of CPO and PK is available within this report (point 1.8.4 page 10-11), following:									
<table border="1"> <thead> <tr> <th>Item</th><th>Production estimated (Tonnes)</th></tr> </thead> <tbody> <tr> <td>FFB</td><td>104,348</td></tr> <tr> <td>CPO</td><td>25,044</td></tr> <tr> <td>PK</td><td>3,130</td></tr> </tbody> </table>		Item	Production estimated (Tonnes)	FFB	104,348	CPO	25,044	PK	3,130
Item	Production estimated (Tonnes)								
FFB	104,348								
CPO	25,044								
PK	3,130								
	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									
The mill only processed FFB into CPO/PK. There is no conversion of products to oleochemicals and its derivatives.									
	Status: Comply								
5.10.2 Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.									
The mill only processed FFB into CPO/PK. There is no conversion of products to oleochemicals and its derivatives.									
	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.									
Pembangunan Raya has no certified product yet. All Records will be verified at ASA 1									
	Status: Comply								
5.12	Complaints								
5.12.1 The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.									
The complaint handling from the stakeholders (buyers / suppliers) are described in SOP no. : BGA-SOP-SM-805.1-R0									

(customer claim), in clauses 6.4, 6.5, 6.6, 6.7 it is mentioned that any complaints with sales and purchases are accepted by commercial head dept, customer claim is forwarded to CL Group Head for appropriate action taking and to related departments.	
	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	
Yes, the latest annual review held on 19 July 2018, discuss on : <ul style="list-style-type: none"> - Result of internal audit SCCS - claim - Complaints from stakeholder - Process performance - Status of preventive and corrective actions. - Recommendations for improvement. 	
Attached the list of attendance including all managers, commercial, sustainability officer, RSPO assisstant, CSR, transport dept and GIS.	
	Status: Comply
5.13.2	
The input to management review shall include information on: <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard. • Customer feedback. • Status of preventive and corrective actions. • Follow-up actions from management reviews. • Changes that could affect the management system. • Recommendations for improvement. 	
Yes, all the input required has been discussed in the management review.	
	Status: Comply
5.13.3	
The output from the management review shall include any decisions and actions related to: <ul style="list-style-type: none"> • Improvement of the effectiveness of the management system and its processes. • Resource needs. 	
Yes, all the output required has been discussed in the management review.	
	Status: Comply

3.2.2 (Module E) CPO Mills - Mass Balance Requirements

Clause	Requirement								
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>Pembangunan Raya Mill has a procedure regarding Supply Chain Certification System used. Mill implements Mass Balance with Module E. Pembangunan Raya Mill receives FFB from own estates, small holders and other company which are not within the certification scope</p> <p>Status: Comply</p>								
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>During this audit, Pembangunan Raya has not been certified. The estimated product of CPO and PK is available within this report (point 1.8.4 page 10-11), following:</p> <table border="1"> <thead> <tr> <th>Item</th><th>Production estimated (Tonnes)</th></tr> </thead> <tbody> <tr> <td>FFB</td><td>104,348</td></tr> <tr> <td>CPO</td><td>25,044</td></tr> <tr> <td>PK</td><td>3,130</td></tr> </tbody> </table> <p>FFB projection decreased compared to the one (1) year period prior to the audit, due to at the time the assessment of production data was still mixed between certified and non certified area.</p> <p>Status: Comply</p>	Item	Production estimated (Tonnes)	FFB	104,348	CPO	25,044	PK	3,130
Item	Production estimated (Tonnes)								
FFB	104,348								
CPO	25,044								
PK	3,130								
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>Pembangunan Raya Mill has been registered in palm trace with number ID RSPO_PO1000004866</p> <p>Status: Comply</p>								
E.3	Documented procedures								
E.3.1	<p>The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:</p> <ol style="list-style-type: none"> Complete and up to date procedures covering the implementation of all the elements in these requirements; The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site procedures for the implementation of this standard. 								

Pembangunan Raya POM has a procedure for implementing the SCC requirements in the document of product identification and traceability, document no. ASM-SUST-SOP-43 revision 01 dated 24 Nov 2017. In procedures describing rules related to SCC implementation, the personnel involve and responsibilities such as commercial departments, sustainability regions, mill managers and OQC Dept.

In addition, has been described in the procedure related to the identification of the raw material (clause 7.1.1), since from field and recorded in delivery consignee (vehicle number, driver, estate, division, departure time, destination, block, planted year, loose fruit weight, number of bunches, field number) and FFB identification at reception at POM (security post and weigh bridge). Also explained that the identification of raw materials derived from certified areas and non certified areas is by marked with CSPO logo on consignee note. In clause 7.3 it is explained that the sustainability region is responsible for informing the production of excessive certified products to CB and clause 7.6 mentions that management review is conducted once a year. During observations to weigh-bridge and interviews with operators are known that the personnel in charge have been aware

Status: Comply

E.3.2

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

The procedure for implementing the SCC requirements and certified product processing describes in the document no. ASM-SUST-SOP-43. The procedure has been referred to new SCC standard and system. In procedures describing rules related to SCC implementation, the personnel involve and responsibilities such as commercial departments, sustainability regions, mill managers and OQC Dept. In addition, has been described in the procedure related to the identification of the raw material (clause 7.1.1), since from field and recorded in delivery consignee (vehicle number, driver, estate, division, departure time, destination, block, planted year, loose fruit weight, number of bunches, field number) and FFB identification at reception at POM (security post and weigh bridge). Also explained that the identification of raw materials derived from certified areas and non certified areas is by marked with CSPO logo on consignee note.

Based on the results of the document review, a field visit revealed that there was an area of $\pm 1,427.11$ Ha of the area not included in the scope of the certification and under the management of each estate namely Belaban Raya Estate ± 299.50 Ha, Bengkuang Raya Estate ± 604.98 Ha and Pembangunan Raya Estate ± 522.63 Ha. The results of field visits and document verification are known that some of these areas are located in the same block as the nucleus estate (certification area) for example in Block H71, I72 Belaban Raya Estate; Block B39, B40 Bengkuang Raya Estate and A17, A18 Pembangunan Raya Estate.

Meanwhile, in the procedure of SCCS (ASM-SUST-SOP-43 revision 01 November 24 2017), it is stated that the status of raw materials (POM) originating from RSPO-certified plantations is marked by the use of CSPO Stamps on each fruit letter. Related to this, the company has not been able to show the evidence

- Mechanisms and implementation in the field related to RSPO-certified and non-certified FFB separation, especially in blocks whose area is divided into two certified or not certified areas.
- Method of recording / documenting the receipt of certified and non-certified FFB in the Pembangunan Raya POM

Based on the explanation, raised the non conformance No 2018.14 with major category

Status: non conformance No 2018.14 with major category

E.4

Purchasing and goods in

E.4.1

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

Pembangunan Raya POM has not been certified, therefore document the volume of certified and non-certified FFB's not yet available.

Status: Comply

E.4.2	
The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	
In the Procedure ASM – SUST-SOP-43 In clause 7.3 it is explained that the sustainability region is responsible for informing the production of excessive certified products to CB	
	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.)	
Pembangunan Raya not been certified, but the Mill has template to separate FFB's sources from Certified and Non-Certified including record of MB on 3 monthly basis. This will be further verified when Pembangunan Raya POM has obtained the certificate.	
	Status: Comply

3.3. Conformity Checklist of Certificate and Trademark Use

1.	Evidence of permission or approval certificate and trademark from Certification Body which submitted by Client	X or√
ST-2	PT Agro Sejahtera Manunggal has not received the RSPO Certificate. Based on the results of the document review, it is known that there is the use of RSPO Trademark in the Fruit Introductory Letter sent to the PKS from each Estate. This is not in accordance with the 2016 RSPO Rules on Market Communications And Claims (TRADEMARK LICENSING BODY; An organization that has been authorized by the RSPO to issue licenses for the use of the RSPO trademark.). Based on the explanation, raised the non conformance No 2018.15 with major category	
	Status: non conformance No 2018.15 with major category	
2.	Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of Logo Use	X or√
ST-2	PT Agro Sejahtera Manunggal has not received the RSPO Certificate. Based on the results of the document review, it is known that there is the use of RSPO Trademark in the Fruit Introductory Letter sent to the PKS from each Estate. This is not in accordance with the 2016 RSPO Rules on Market Communications And Claims (TRADEMARK LICENSING BODY; An organization that has been authorized by the RSPO to issue licenses for the use of the RSPO trademark.). Based on the explanation, raised the non conformance No 2018.15 with major category	
	Status: non conformance No 2018.15 with major category	
3.	Implementation of Certificate and Trademark is not used on product	X or√
ST-2	PT Agro Sejahtera Manunggal has not received the RSPO Certificate. Based on the results of the document review, it is known that there is the use of RSPO Trademark in the Fruit Introductory Letter sent to the PKS from each Estate. This is not in accordance with the 2016 RSPO Rules on Market Communications And Claims (TRADEMARK LICENSING BODY; An organization that has been authorized by the RSPO to issue licenses for the use of the RSPO trademark.). Based on the explanation, raised the non conformance No 2018.15 with major category	
	Status: non conformance No 2018.15 with major category	
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate logo.	X or√
ST-2	PT Agro Sejahtera Manunggal has not received the RSPO Certificate. Based on the results of the document review, it is known that there is the use of RSPO Trademark in the Fruit Introductory Letter sent to the PKS from each Estate. This is not in accordance with the 2016 RSPO Rules on Market Communications And Claims (TRADEMARK LICENSING BODY; An organization that has been authorized by the RSPO to issue licenses for the use of the RSPO trademark.). Based on the explanation, raised the non conformance No 2018.15 with major category	
	Status: non conformance No 2018.15 with major category	

3.4. Summary of RSPO Partial Certification.

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

Bumitama Agri, Ltd Time Bound Plan is explained in table 1.10. Bumitama Agri, Ltd has informed the Time Bound Plan progress, MUTU has considered that MP Bumitama Agri, Ltd is complied with the RSPO requirement for Time Bound Plan. The Time Bound Plan was revised and declared by Bumitama Agri, Ltd on 4 May 2017.

MUTU has verified partial certification for un-certified unit's subsidiary of Bumitama Agri, Ltd based on their Time Bound Plan. There are nine (9) uncertified mills and thirty two (32) uncertified estates management units of Bumitama Agri, Ltd. MUTU Auditor verified positive assurance against the company internal audit and supporting evidence as well as any information from others sources.

MUTU Auditor has verified company partial certification and concludes that:

- There 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?	Based on the document review, there is a company internal audit that was conducted on 2018 and the positive assurance is at this table that is also been verified.
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. 	<ol style="list-style-type: none"> 1. PT Ladang Sawit Mas <ul style="list-style-type: none"> - LUCA was sent on 16 July 2014 to RSPO - Documents RaCP Plan still review process from RSPO and waiting for approval - HCV was conducted on December 2013 by Sonokeling Akreditasi Nusantara 2. PT Lestari Gemilang Intisawit <ul style="list-style-type: none"> - LUCA was sent on 7 November 2014 to RSPO - Documents RaCP Plan still review process from RSPO and waiting for approval - HCV was conducted on 2013 by Sonokeling Akreditasi Nusantara 3. PT Agro Manunggal Sawitindo <ul style="list-style-type: none"> - LUCA was sent on 7 November 2014 to RSPO - HCV was conducted on July 2013 by Sonokeling Akreditasi Nusantara - Documents RaCP Plan still review process from RSPO and waiting for approval 4. PT Karya Makmur Langgeng <ul style="list-style-type: none"> - LUCA was sent on January 2015 to RSPO

		<ul style="list-style-type: none"> - Documents RaCP Plan are wait for LUCA approved by RSPO - HCV was conducted on July 2013 by Sonokeling Akreditasi Nusantara <p>5. PT Gemilang Makmur Subur</p> <ul style="list-style-type: none"> - HCV was conducted on November 2016 by PT Gagas Dinamika Aksenta. - LUCA was sent on January 2015 to RSPO - LUCA still waiting Review in RSPO <p>6. PT Nabati Agro Subur</p> <ul style="list-style-type: none"> - LUCA was sent on 2018 to RSPO - LUCA still waiting Review in RSPO <p>-</p> <p>7. PT Sejahtera Sawit Lestari</p> <ul style="list-style-type: none"> - LUCA was sent on 2018 to RSPO - LUCA still waiting Review in RSPO <p>8. PT Damai Agro Sejahtera</p> <ul style="list-style-type: none"> - LUCA still calculated by internal BGA <p>-</p> <p>9. PT Windu Nabatindo Sejahtera</p> <ul style="list-style-type: none"> - LUCA was sent on 19 June 2018 to RSPO - HCV was conducted on March 2012 by Faculty of Forestry IPB - Documents RaCP Plan still review process from RSPO and waiting for approval <p>10. PT Andalan Sukses Makmur</p> <ul style="list-style-type: none"> - LUCA was sent on January 2015 to RSPO - Documents RaCP Plan are wait for LUCA approved by RSPO - HCV was conducted on October 2013 by Sonokeling Akreditasi Nusantara <p>11. PT Investa Karya Bhakti</p> <ul style="list-style-type: none"> - LUCA was sent on 13 June 2016 to RSPO - Documents RaCP Plan are wait for LUCA approved by RSPO - HCV was conducted on November 2015 by Sonokeling Akreditasi Nusantara <p>12. PT Langgeng Makmur Sejahtera</p> <ul style="list-style-type: none"> - LUCA sent to RSPO on and - RaCP Plan document are wait for LUCA documents to be submitted and approved by RSPO. - HCV conducted March 2012 by Forestry IPB. <p>13. PT Tanah Tani Lestari</p> <ul style="list-style-type: none"> - LUCA was sent on 14 April 2015 to RSPO
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		<ul style="list-style-type: none"> - Documents RaCP Plan are wait for LUCA approved by RSPO - RaCP Plan document has been submitted and waiting for approved by RSPO. - HCV was conducted on August 2014 by Sonokeling Akreditasi Nusantara <p>14. PT Gunajaya Harapan Lestari</p> <ul style="list-style-type: none"> - LUCA was sent on May 2017 to RSPO - Documents RaCP Plan are wait for LUCA approved by RSPO - RaCP Plan document has been submitted and waiting for approved by RSPO. - HCV was conducted on October 2012 by faculty of Forestry IPB <p>Auditor verification Based on internal audit results and evidence provided (communication to RSPO on liability disclosure) shows that all subsidiaries of Bumitama has been sent to RSPO and now on progress of LUCA review.</p>
2.1.3	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<ol style="list-style-type: none"> 1. PT Ladang Sawit Mas, NPP was completed publish on 08 October 2014 2. PT Lestari Gemilang Intisawit, NPP was completed publish on 03 July 2014 3. PT Agro Manunggal Sawitindo, NPP was completed publish on 03 July 2014 4. PT Karya Makmur Langgeng, NPP was completed publish on 18 December 2013 5. PT Gemilang Makmur Subur, NPP was completed publish on October 2014 6. PT Nabati Agro Subur, NPP on Process 7. PT Sejahtera Sawit Lestari, NPP on Process 8. PT Damai Agro Sejahtera, NPP on Process 9. PT Andalan Sukses Makmur, NPP was completed for areal 5,630 Ha and publish on 07th February 2014 10. PT Investa Karya Bhakti, NPP was completed for areal 5,700 Ha and publish on October 21th 2016. 11. PT Langgeng Muara Makmur Sejahtera, there is no new planting after January 1st 2010. 12. PT Tanah Tani Lestari NPP Conducted on 2015 but not finished due HCV Documents 13. PT Gunajaya Harapan Lestari, Sanction Mechanism will be applicable
2.1.4	Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in	In early 2015 Bumitama rolled out new complaint process (Bumitama Complaint Flow Chart, https://bit.ly/2SQudkk which allocates clear organisational responsibility to ensure that all complaints are being reported and addressed at group-level.

	<p>accordance with RSPO criteria 6.4, 7.5 and 7.6.</p>	<p>Documents verifications, internet checking, there is several land dispute in the company under Bumitama, for example:</p> <p>1. PT Windu Nabatindo Sejahtera</p> <p>The company has a SOP on land conflict management (ASM-PAD-SOP-0117.2-ROO) which aims as a provision for the management of the company and related parties in the process of resolving land conflicts that arise based on an agreement with the right holders or parties who have such interests. in the procedure it is stated that the conflict resolution stage begins with the identification of the area / potential land conflicts, the process of resolving land conflicts. In the procedure shows that every conflict is resolved by consultation with other parties agreed facilitation. The conflict resolution process has followed the principles in FPIC.</p> <p>There is land conflict in PT Windu Nabatindo Sejahtera as follows, https://bit.ly/2Wb6wFN the conflict has been resolved with involving all affected party</p> <p>2. PT Hati Prima Agro (a Subsidiary of BUMITAMA AGRI LTD.)</p> <p>Complaints from Sawit Watch</p> <p>Summary of the complaint : As a result of the revocation of the Forest Relinquishment Decree ("2008 Decree") on June 2012 over its area by the local government,. PT Hati Prima Agro's Permit & License validity and legality have been called into question Subsequently, the issuance of Wood Utilization License (IPK) to UD Karya Budi by the Kotawaringin Timur Forestry Agency in Antang Kalang Kotawaringin Timur District, Central Kalimantan was alleged not to be inaccordance with national laws of Indonesia.</p> <p>Complaint Update</p> <table><tr><th>Date</th><th>Status / Update</th></tr><tr><td>13 December 2012</td><td>Warning letter to the Respondent RSPO's response to PT HPA</td></tr><tr><td>07 January 2013</td><td><ul style="list-style-type: none">• Response to RSPO Grievance Panel Preliminary Findings• BGA's letter to RSPO - Response to Preliminary Findings.</td></tr><tr><td>20 May 2013</td><td>The State Administrative High Court in a unanimous decision (Appeal Decision) in the favour of HPA which reaffirmed the Palangkaraya State Administrative Court Decision 12/G/2012/PTUN.PLK dated 4 December 2012. The Administrative High Court decided that the legal considerations of the Palangkaraya Administrative Court Decision were</td></tr></table>	Date	Status / Update	13 December 2012	Warning letter to the Respondent RSPO's response to PT HPA	07 January 2013	<ul style="list-style-type: none">• Response to RSPO Grievance Panel Preliminary Findings• BGA's letter to RSPO - Response to Preliminary Findings.	20 May 2013	The State Administrative High Court in a unanimous decision (Appeal Decision) in the favour of HPA which reaffirmed the Palangkaraya State Administrative Court Decision 12/G/2012/PTUN.PLK dated 4 December 2012. The Administrative High Court decided that the legal considerations of the Palangkaraya Administrative Court Decision were
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			already appropriate and legally correct.
		27 Juny 2013	Only one of the defendants, the Indonesian Ministry of Forestry submitted an appeal to the Supreme Court to challenge the decision of revocation of 2008 Decree of revocation, while the Head of Regency did not submit an appeal to challenge the Administrative Court Decision which ordered to revoke the Revocation of Location Permit. As of this letter the case is on the Supreme Court's docket waiting to be heard
		1 December 2013	<ul style="list-style-type: none"> HPA received official notice of appeal from the Palangkaraya Administrative Court that the defendants, the Head of Regency and Ministry of Forestry to the legal proceedings (Appellants) lodged an appeal on the Administrative Court Decision to the State Administrative High Court. Sawit Watch and BGA had meeting during RT 12 in Kuala Lumpur, November 2014 they are planning to have field visit.
		16 December 2013	Sawit Watch's response
		10 Apr 2014	Chronology of Complaint against BAL by Aid Environment
		07 Aug 2014	Bumitama - Announcement of Notice of Appeal
		19 Sep 2014	News release - Clarification on HPA
		16 Oct 2014	Supreme Court Decision - RI
		04 Nov 2014	RSPO letter to BGA on behalf of the Complaints Panel
		09 Jan 2015	BGA announced on SGX that they will be compensated the land new owner, PT Langgeng Makmur Sejahtera with amount IDR 400b for the asset and land
		19 Mar 2015	RSPO's letter to BGA on behalf of the Complaints Panel
		31 Mar 2015	Letter from BGA to RSPO - Ijin Lokasi.
		01 Apr 2015	BGA submitted formal letter, to reaffirm that the status of the conditional sales and purchase has been conducted between PT HPA and PT Langgeng Makmur Sejahtera, as the new owner of the location permit (Ijin Lokasi) and Plantation Business License (Ijin Usaha Perkebunan) of the HPA in accordance with the relevant Indonesian Laws and regulations
		21 Apr 2015	Base on Complaints Panel meeting on 15

			April 2015, RSPO Complaints Panel agreed to close this complaint. The formal letter on case closure was sent to BGA on 21 April 2015 by the RSPO Secretariat.
		13 Oct 2017	Secretariat received a request for reopening of the previously closed case
		24 Oct 2017	Secretariat forwarded the documents related to the request to re-open the case of PT HPA to Bumitama.
		07 Nov 2017	Secretariat received a response letter from Bumitama
		21 Feb 2018	Secretariat to follow up with the Complainants.
		21 Mar 2018	Secretariat has a meeting with the company to discuss the chronology of the legality Permit for PT. HPA. Secretariat requested the company to provide the copy of the permit for PT. HPA.
		28 Mar 2018	Follow up with the company to provide the copy of the permit for PT. HPA. Secretariat to review the documents from the company
		25 Apr 2018	To follow up with the Company on the copy of the documents and proceed to review the document
		25 May 2018	To commission a legal expert to do a complete review of the documents.
		18 Jun 2018	Follow up action to be discussed further.
		25 Jul 2018	Continue to proceed with the legal review
		23 Aug 2018	Company to be informed of the decision related to cost for the legal review
		26 Sep 2018	The CP's cost directive issued to the respondent and to follow up with the Respondent and the independent legal expert.
		24 Oct 2018	The Respondent agreed on the CP's cost directive. The Secretariat to follow up on the legal review report from the legal consultant
		27 Nov 2018	The Respondent has submitted the necessary documents and it has been forwarded to the legal consultant for review. The Secretariat to follow up on the legal review report from the legal consultant
		19 Dec 2018	The first draft of the legal review has been received from the legal consultant. The Secretariat to circulate it to the CP for review
		PT Bumitama Gunajaya Abadi	

		<p>Complaints from: Sawit Watch</p> <p>Summary of the Complaint : Allegations (1) Dispute on plasma scheme mechanism; (2) Cooperative issues; (3) Claims from 15 members of communities (14 villagers from Kinjil Village and 1 Villager of Sukajaya Village).</p> <p>Complaint Update</p> <table><tr><th>Date</th><th>Status / Update</th></tr><tr><td>26 Oct 2016</td><td>A stakeholders meeting held between Sawit Watch and Bumitama facilitated by Secretariat. Both parties agreed to focus on the land claim from 15 villagers and conduct a joint field visit</td></tr><tr><td>18 Nov 2016</td><td>A meeting between held in Shangri-La Hotel Bangkok. It is agreed that the field visit will be held in early December 2016.</td></tr><tr><td>01 Dec 2016</td><td>A stakeholders meeting held in Pangkalan Bun, Central Kalimantan. 15 villagers, Sawit Watch, Walhi, PT BGB, RSPO have attended the meeting, facilitated by an independent party - Madyasta Dispute Resolution. All parties have signed an agreement to ensure the safety of the community from intimidation during the conflict resolution process.</td></tr><tr><td>02 Dec 2016</td><td>A field visit has conducted to check the location alleged by 15 members of communities, followed by a meeting between PT BGB, Sawit Watch and Tim Desa (a Team consists of Head of Villages) to verify the documentation and allegations of the communities. All parties agreed to conduct participatory mapping and document checking on 10 January 2017.</td></tr><tr><td>10 Jan 2017</td><td>As agreed at the previous stakeholders meeting, a participatory mapping has conducted for 2 days in Kotawaringin Lama. All parties have attended the process, including 15 members of community, Tim Desa, and Sawit Watch, observed by an independent facilitator. A follow-up site visit is scheduled to be conducted in late February 2017</td></tr><tr><td>28 Feb 2017</td><td>The meeting between parties was held in Kotawaringin Lama, facilitated by an independent facilitator and observed by RSPO</td></tr><tr><td>18 Apr 2017</td><td>The report of stakeholders meeting has been shared with both parties for their reviews.</td></tr></table>	Date	Status / Update	26 Oct 2016	A stakeholders meeting held between Sawit Watch and Bumitama facilitated by Secretariat. Both parties agreed to focus on the land claim from 15 villagers and conduct a joint field visit	18 Nov 2016	A meeting between held in Shangri-La Hotel Bangkok. It is agreed that the field visit will be held in early December 2016.	01 Dec 2016	A stakeholders meeting held in Pangkalan Bun, Central Kalimantan. 15 villagers, Sawit Watch, Walhi, PT BGB, RSPO have attended the meeting, facilitated by an independent party - Madyasta Dispute Resolution. All parties have signed an agreement to ensure the safety of the community from intimidation during the conflict resolution process.	02 Dec 2016	A field visit has conducted to check the location alleged by 15 members of communities, followed by a meeting between PT BGB, Sawit Watch and Tim Desa (a Team consists of Head of Villages) to verify the documentation and allegations of the communities. All parties agreed to conduct participatory mapping and document checking on 10 January 2017.	10 Jan 2017	As agreed at the previous stakeholders meeting, a participatory mapping has conducted for 2 days in Kotawaringin Lama. All parties have attended the process, including 15 members of community, Tim Desa, and Sawit Watch, observed by an independent facilitator. A follow-up site visit is scheduled to be conducted in late February 2017	28 Feb 2017	The meeting between parties was held in Kotawaringin Lama, facilitated by an independent facilitator and observed by RSPO	18 Apr 2017	The report of stakeholders meeting has been shared with both parties for their reviews.
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		31 May 2017	Secretariat continues to communicate between both parties and monitor the progress of the case.
		10 Jul 2017	Complainant has submitted an update from the community.
		26 Sep 2017	Secretariat will set up a meeting with the complainant.
		06 Oct 2017	Secretariat had a discussion with the Complainant.
		21 Feb 2018	To write a final letter to Sawit Watch to respond
		28 Mar 2018	To proceed with the meeting with the Complainants on 1 May 2018.
		25 May 2018	To follow up with both parties on the bipartite meeting.
		23 Aug 2018	There was a meeting with the Company and facilitator. The next meeting to include an invitation to the head of the village as they are also a stakeholder to the complaint.
		26 Sep 2018	To provide briefing notes to the CP summarising the status of the case.
		24 Oct 2018	Secretariat to provide the briefing note to the CP.
		27 Nov 2018	The Secretariat to provide the briefing note to the CP to support the deliberation
		19 Dec 2018	The Secretariat is to set a meeting with the Respondent to seek for clarification. The Secretariat is to finalised the briefing note and circulate it to the CP.
		<p>Moreover there is publication from Publication from Greenpeace (10 September 2018 https://bit.ly/2VJo1g3) Link on A Greenpeace International investigation reveals an apparent laundering scheme by the group designed to conceal its connection to numerous concessions during their development without permits or in breach of RSPO rules.</p> <p>The scheme involved passing nominal control to one or more of a handful of 'third parties' supposedly unconnected to Bumitama. At least 18 plantation companies – one-third of Bumitama's total – passed through the hands of one or more of the 'third parties' before being formally acquired or reacquired by Bumitama, often for a trivial sum.</p> <p>Greenpeace mapping analysis shows that since 2005, 11,100ha of forest were cleared within the 'laundered' concessions in the three case study areas – nearly 2,300ha of this clearance from 2014 onward. Under RSPO rules, this should result in Bumitama's expulsion from the RSPO.</p>	

		<p>About that's issue Bumitama has clarify on 15 November 2018</p> <p>Bumitama Agri Ltd. And its Group ("Bumitama") would like to assure all stakeholders that the allegations contained in the Greenpeace report named "Dying for a cookie" have already been addressed in our sustainability and annual reports, announcements and earlier news releases. The acquisition of companies from third parties has not been designed to conceal developments without permits or to breach the RSPO rules. Given that process of licensing in Indonesia be very long and tedious, Bumitama has at certain occasions preferred acquiring companies furnished with permits for planting. Bumitama does acknowledge that there was a period of time when adherence with the RSPO P&Cs displayed a gap and resulted in complaints, but through the conception of our Sustainability policy and by working together with RSPO, Appropriate measures and actions were taken to raise our compliance. Ever since, Bumitama have closely observed the NPP, HCV Assessments to HCV RN review and subscribing to the HCS Approach. Bumitama pursue the complaints procedure for resolution of any outstanding complaints for resolution of any outstanding complaints, which can be tracked through the RSPO Website.</p>
2.1.5	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	<p>Bumitama has put in place a whistle-blowing policy (https://bit.ly/2H7DtZl), whereby employees or any other persons such as customers, suppliers, contractors or local community may, in good faith and confidence, without fear of reprisals raise concerns about possible improprieties in financial reporting, unethical practices or other matters. Anonymous disclosures will also be accepted and anonymity honoured. The whistle-blowing policy and the procedures put in place to implement such a policy, has been reviewed and approved by our Audit Committee. Whistle blowing can be initiated via text/call to mobile number +6281286419700 or email to audit.pengaduan@bumitama.com</p> <p>The Group provides another hotline channel for employees to convey their complaints, which are primarily HR-related concerns.</p>
2.1.6	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	<p>The company has had legal documents as follows</p> <ol style="list-style-type: none"> PT Sentosa Prima Agro <ul style="list-style-type: none"> - Land Use Title Documents No 2 year of 1999 covering 3,087 Ha - Plantation Permit No 522/DISBUN-D/2016 from Head of Ketapang Regency PT Raya Sawit Manunggal <ul style="list-style-type: none"> - Land Use Title Documents No 6 year of 1995 covering 4,034 Ha - Plantation Permit No 521/Disbun-D/2016 from Head of Ketapang Regency

		<p>3. PT Wahana Hijau Indah</p> <ul style="list-style-type: none"> - Land Use Title Documents No 7 year of 1995 covering 4,391,68 Ha - Plantation Permit No 520/Disbun-D/2016 from Head of Ketapang regency <p>4. PT Sejahtera Sawit Lestari</p> <ul style="list-style-type: none"> - Location Permit No 267 year of 2007 dated 28 June 2007 from Head of Ketapang Regency - Location Permit No 680 year of 2013 dated 31 December 2013 from Head of Ketapang Regency - Enviromental Permit No 450/KLH-N/2014 dated 09 January 2014 - Plantation Permit No 239/Disbun-D/2014 dated 25 March 2015 - <p>5. PT Karya Makmur Langgeng</p> <ul style="list-style-type: none"> - Location Permit No 293 year of 2006 dated 04 September 2006 from Head of Ketapang Regency - Extension Location Permit No 24 year of 2010 dated 13 January 2010 from Head of Ketapang Regency - Forest release decree No SK.689/Menhut-II/2011 08 December 2011 - Plantation Permit No 510/DISBUN-D/2013 dated 16 October 2013 - <p>6. PT Lestari Gemilang Inti Sawit</p> <ul style="list-style-type: none"> - Location Permit No 459 year of 2011 dated 07 November 2011 from Head of Ketapang Regency - Plantation Permit No 307/Disbun-D/2013 dated 17 June 2013 - Enviromental Permit No 284 /2009 dated 20 May 2009 - <p>7. PT Agro Manunggal Sawitindo</p> <ul style="list-style-type: none"> - Location Permit No 458 year of 2011 dated 04 September from Head of Ketapang Regency - Extension Location Permit No 449 year of 2015 dated 29 June 2015 - Plantation Permit No 3080/DISBUN-D/2013 dated 17 June 2017 - <p>8. PT Ladang Sawit Mas</p> <ul style="list-style-type: none"> - Principle permit No 525/504/IV-Bapedalpemnda dated 27 October 2015 - Location Permit No 172 year of 2006 dated 14 June 2006 from Head of Ketapang Regency - Extension Location Permit No 415 year of 2009 dated 09 November 2009 - Plantation Permit No 420 year of 2010 dated 28 July
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		<p>2010</p> <ul style="list-style-type: none"> - Enviromental Permit 49/BLHD/2010 dtaed 27 Januar 2010 <p>-</p> <p>9. PT Gemilang Makmur Subur</p> <ul style="list-style-type: none"> - Principle permit No 525/263/DPU-E dated 27 March 2014 - Location Permit No 272 year of 2015 dated 02 April 2015 from Head of Ketapang Regency - Plantation Permit No 773?DISBUN-D/2015 dated 27 November 2015 - Enviromental Permit 743/KLH-B/2015 dated 3 November 2015 <p>-</p> <p>10. PT Nabati Agro Subur</p> <ul style="list-style-type: none"> - Principle permit No 525/96/DPU-E dated 05 February 2014 - Location Permit No 456 year of 2014 dated 18 March 2014 from Head of Ketapang Regency - Plantation Permit No 238/DISBUN-D/2015 dated 25 March 2015 - Enviromental Permit 47/KLH-B/2015 dated 12 January 2015 <p>11. PT Damai Agro Subur</p> <ul style="list-style-type: none"> - Principle permit No 525/704/DPU-E dated 05 February 2014 - Location Permit No 27 year of 2014 dated 08 January 2016 from Head of Ketapang Regency - Plantation Permit No 576/DISBUN-D/2016 dated 25 August 2016 <p>-</p> <p>12. PT Windu Nabatindo Sejahtera</p> <ul style="list-style-type: none"> - Principle Permit about location No. 02.04.28/525.26/463/XI/EkBang/03, 8th November 2003 for areal 7,000 Ha. - Location Permit SK District Kotawaringin Timur No. 165.460.42, 26 February 2004 for 5,370 Ha - IUP No. 525.26/152/V/EkBang/2004, 17 May 2004 for 5,370 Ha - Permit Location No. 374.460.42, December 13 2006 for 5,000 Ha (Revision) - IUP No. 525.26/386/V/EkBang/2007, May 30th 2007 for areal 5,000 Ha (Revision) - Kadastral Map No. 355-15.05-2007, July 6th 2007 for areal 4,998.76 Ha - Land Title application letter NO 003/WNS-Dir/VII/2007, July 11th 2007 for areal 5,000 Ha. - Minutes of Committee B (Risalah Panitia B) No 23/HGU.RPD/IX/42/2007 dates 25 September 2007 with covering 4,998.76 Ha.
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		<p>13. PT Andalan Sukses Makmur</p> <ul style="list-style-type: none"> - Principle Permit about location, decree from head of District Kotawaringin Barat No.590/105/Pem-XI/2012, November 21 2012 for areal 9,000 Ha. - Location Permit SK District Kotawaringin Barat No.525/68/XII/2012, December 18th 2012 for 9,275 Ha - IUP No. 525/45/ek, 06 February 2013 - HGU on process. <p>14. PT Investa Karya Bhakti</p> <ul style="list-style-type: none"> - Principle Permit about location No. 590/09.Pem-II/2014, 3rd February 2014 for areal 14,500 Ha. - Location Permit SK District Kotawaringin Barat No. 525/62/IX/2014, 1st September 2014, 11,746.74 Ha - IUP No. 525/014/EK, April 21 2015, 5,700 Ha - Land Title application letter NO 003/WNS-Dir/VII/2007, July 11th 2007 for areal 5,000 Ha. <p>15. PT Langgeng Makmur Sejahtera</p> <ul style="list-style-type: none"> - Principle Permit about location No. 525.21/660/Ek.SDA/IX/2014 dated 12 September 2014 5,325 Ha - Location Permit SK District Kotawaringin Timur No. 188.45/330/Huk-BPN/2014, 23 September 2014 5,370 Ha - Environment Permit No. 660/2140/BLH-Ek.SDA/2015, 19 October 2015 for 5,325 Ha - IUP No. 188.45/490/Huk-Ek.SDA/2014, 19 December 2014 4,810.72 Ha - SK HGU No. 5/HGU/KEM-ATR/BPN/2017, January 10th 2017. <p>16. PT Tanah Tani Lestari</p> <ul style="list-style-type: none"> - Principle Permit about location No. 525.21/439/VII/EK.SDA/2012 dated 03 September 2012 - Forest Release permit 4/1PKH/PMA/2017 dated 30 January 2017 - Plantation Permit No. 188.45/490/Huk-Ek.SDA/2013, 31 January 2013 - Land Use Title Degree No 59/HGU/BPN dated 27 September 2016 <p>17. PT Gunajaya Harapan Lestari</p> <ul style="list-style-type: none"> - Principle Permit about location No. 525/426/Bappeda-D year of 2007, 08 May 2007 for areal 3,000 Ha. - Location Permit SK District Kendawangan No. 265 year of 2007, 28 June 2007 for 3,000 Ha - Revision Location Permit No. 370 year of 2008, 07 October 2008 for 3,000 Ha - Extension Location Permit No. 415 year of 2010, 27
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		<p>July 2010 for 3,000 Ha</p> <ul style="list-style-type: none"> - IUP No. 365/DISBUN-D/2012, August 23rd 2012 for 1,750 Ha - HGU No. 62/HGU/KEM-ATR/BPN/2016, 1,973.45 Ha <p>Auditor verification Land legal process is still going on and there is a detail update progress documented by the company for each year.</p>
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3.5 Identification of Findings, Corrective Action, Observations, Opportunity for Improvement and Noteworthy Positive Components.

3.5.2 Identification of Findings, Corrective Actions and Observations at ST2

NCR No.	: 2018.01	Issued by	: M. Amarullah
Date Issued	: 07 September 2018	Time Limit	: ASA1
NC Grade	: Minor	Date of Closing	: 9 October 2018
Standard Ref. & Requirement	: 2.1.2 A documented system, which includes written information on legal requirements, shall be maintained.		
Evidence observed (filled by auditor): Information about law or regulations listed in the Law Register document, but there are some law or regulation that have not been listed in the law registers, such as: <ul style="list-style-type: none">• Governor of West Kalimantan Decree No. 706 / 2017 related to the Minimum Wage of the Ketapang Regency of West Kalimantan.• Ministry of Manpower Regulation No. 5 / 2018 related to Occupational Safety and Health• Ministry of Environment Regulation No. 45 / 2005 related to RKL / RPL reports• Ministry of Environment Regulation No. 20 / 2018 related to protected plants and wildlife species• Ministry of Agrarian and Spatial Planning Regulation / Head of National Land Agency Number 7 / 2017 related to arrangement and procedures for the determination of the HGU• Ministry of Agriculture No. 5 / 2018 related to land clearing without burning• Government Regulation No. 71 / 2014 related to the protection and management of peat			
Non-Conformance Description (filled by auditor): PT ASM cannot show the evidence if all regulations that mandatory has been listed in the Law Register			
Root Cause Analysis (filled by organization audited): Ineffective document control from Sustainability Region on the application of SOP for Identification & Evaluation of Regulations			
Correction Action (filled by organization audited): Updated Law Registry based on the identification of new regulations that are relevant to the company (if any).			
Corrective Action (filled by organization audited): 1. Review of documents in accordance with the SOP for Regulation Identification & Evaluation. 2. Implementation of Internal Audit & Management Review			
Assessor Evaluation and Conclusion (filled by auditor) : Auditor Verification 9 October 2018 The company can show corrective evidence in the form of a list of laws and regulations in the field of OHS, Plantation and Environment. The list of regulations has been revised on September 24, 2018. Regulations updated include: Environmental aspect <ul style="list-style-type: none">- Regulation of the Minister of Environment No. 45 of 2005 concerning the RKL / RPL report- Regulation of the Minister of Environment No. 05 of 2014 concerning Waste Water Quality Standards Safety aspect: <ul style="list-style-type: none">- Decree of the Governor of West Kalimantan No. 706 / Disnakaertrans / 2017 concerning the Minimum Wage of Ketapang Regency, West Kalimantan. Plantation and spatial aspect			

- Minister of Agrarian and Spatial Planning / Head of the National Land Agency Number 7 of 2017 concerning the regulation and procedures for establishing business use rights
- Government regulation No 71 of 2014 concerning the protection and management of peat ecosystems

Based on Root Cause Analysis, Correction, Corrective Action and corrective evidence that addressed, the non conformity on this indicator Stated Closed

Verified by : **Moh Arif Yusni**

NCR No.	: 2018.02	Issued by	: Moh Arif Yusni
Date Issued	: 07 September 2018	Time Limit	: ASA-1
NC Grade	: Minor	Date of Closing	: 12 October 2018
Standard Ref. & Requirement	: 2.2.2 Legal boundaries are demonstrated clearly and maintained.		
Evidence observed (filled by auditor): Based on the verification results of the PT Agro Sejahtera Manunggal document, it has identified the land demarcation boundary (HGU poles) which explains the location of the poles, coordinates and the location map of the poles. Based on the results of the identification, it is known that there are 122 poles in the land title area. The results of monitoring in June 2018 revealed that there were 6 HGU poles that could not be installed due to their location on the river border. Based on the results of the field visit, it was discovered that there were several stakes whose location did not match the coordinates that had been set, for example: <div><div>1.</div><div>Bengkuang Raya Estate HGU poles no ASM A61 Block D39; ASM 60 Block 40 B, the poles is ± 50 meters from the specified coordinates</div></div> <div><div>2.</div><div>Construction of Raya Estate HGU poles no ASM59 Block A03 is ± 37 meters from the specified coordinates</div></div>			
Related to this matter, the company has not been able to show proof that the boundary mark has been installed in accordance with the coordinates that have been set			
Non-Conformance Description (filled by auditor): PT ASM has not been able to show proof that the boundary mark has been installed in accordance with the coordinates that have been set			
Root Cause Analysis (filled by organization audited): The lack of understanding for PIC maintenance of pole boundaries is related to the installation of stakes that match the coordinates of the land title map.			
Correction (filled by organization audited): <div><div>1.</div><div>Reviewing the entire stone boundaries that are installed with the coordinate points printed on the land title map</div></div> <div><div>2.</div><div>Reassignment of the stone boundaries that do not match the location of land title map and the installation of the boundaries pole for the river border area.</div></div>			
Corrective Action (filled by organization audited): Maintenance of all boundaries pole according to the Program that coordinated by the Assistant GIS Region.			
Assessor Evaluation and Conclusion (filled by auditor): Auditor Verification 12 October 2018 The company submits corrective evidence in the form of: <div><div>1.</div><div>Program for Installation and Maintenance of polled boundaries in 2018 which includes the inventory of stakes in accordance with maps of the BPN, repairs of lost and damaged stakes, maintenance programs and polishing installing boundaries</div></div>			

2. Minutes of observation, Replacement and adjustment of position of boundaries stakes for example on September 27, 2018 in Bengkuang Raya Estate where from 36 stakes it is known that 24 stakes are suitable, 11 stakes are not suitable and 1 stakes are not installed (in river banks)
3. Observation report, Replacement and adjustment of boundaries stake position for example on September 28, 2018 in Belaban Raya Estate where 34 polls are known that 16 stakes are suitable, 10 Stakes are not appropriate, 5 poles are installed (in river banks) and missing 3 polish
4. Minutes of observation, replacement and adjustment of boundaries stakes position for example on September 28, 2018 at Pembangunan Raya Estate where from 52 stakes it was known that 34 stakes were suitable, 11 stakes was not suitable and 7 stakes were missing

Based on Root Cause Analysis, Correction, Corrective Action and corrective evidence that addressed, the non conformity on this indicator Stated Closed

Verified by : **Moh Arif Yusni**

NCR No.	: 2018.03	Issued by	: Mohamad Amarullah
Date Issued	: 07 September 2018	Time Limit	: ASA-1
NC Grade	: Minor	Date of Closing	: 13 November 2018
Standard Ref. & Requirement	: 4.1.3 Records of monitoring and any follow-up actions shall be available.		
Evidence observed (filled by auditor): Based on document review and field observation, it was known that there were area for about ±1,427.11 ha which not included on the scope of certification (non-certified), but still managed under PT Agro Sejahtera Manunggal management. Those area were divided into ±299.50 ha in Belaban Raya Estate, ±604.98 ha in Bengkuang Raya Estate, ±522.63 ha in Pembangunan Raya Estate and ±40.47 ha in KUD Agri Seriam Mandiri. Regarding this matters, company management was not be able to shows that any records related to oil palm agronomy and environment management for example fertilizer and pesticide consumption and Green House Gasses calculation, etc. were been separated towards certified and non-certified area.			
Non-Conformance Description (filled by auditor): The company is not be able to shows that mechanism of documentation in accordance with scope of certification (separation for certified and non-certified area) has conducted properly.			
Root Cause Analysis (filled by organization audited): Lack of understanding of Unit Manager related to the mechanism for documenting the boundary map of the RSPO certificate scope for the HGU area in each Work Unit according to their scope of responsibility and the application of identification of each RSPO certified Estate that is equipped with block numbers and verification of certified FFB in each FFB delivery notes which were accepted by PRYM			
Correction (filled by organization audited): <ol style="list-style-type: none">1. Preparation of documentation and identification of boundary procedures in the field for the scope of RSPO certification and non-RSPO certification areas in each Unit: BRYE, BKYE, PRYE, KUD Agro Semesta.2. Provision of boundary documentation in the field for the scope of RSPO certification and areas that are not RSPO certified in each Unit: BRYE, BKYE, PRYE, KUD Agro Semesta3. providing evidence of the results of verification of RSPO certified FFB and non-RSPO certified according to the <i>procedur Identifikasi dan Kemampuan Telusur Produk</i>.			
Corrective Action (filled by organization audited):			

1. Implementation of the Product Tracing & Capability Identification procedure (documentation / recording mechanism related to the area in accordance with the scope of the certification described in this procedure).
2. Implementation of Internal Audit and Management Review.

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

Verification 12 October 2018

The company submits corrective evidence in the form of:

1. Separation mechanism for certified and non-certified FFB (ASM Document No. - SUST-GDN-01), in the mechanism explains related to
 - Marking the boundaries of certified FFB areas with those not certified
 - Verification of mill is related to the source of FFB from the unit (certified or not)
2. Certified and non-certified FFB separation mechanism training report to the PT ASM Estate Administration and Mill which was held on October 5, 2018
3. Internal Office Memo No. 001 / ASM-SUST / X / 2018 dated October 1, 2018 from the Area Controller 7A Regarding the RSPO PT ASM FFB Separation Commitment which explained that to all PT ASM managers to:
 - Conduct an inventory of certified block in PT ASM's HGU.
 - Administration of FFB production administration in certified block starting from RSPO FFB delivery notes (See RSPO Estate Block attachment) to the Mill. The RSPO FFB delivery notes that was accepted due to the weigh of the FFB was then separated & the administration of RSPO FFB registration by the Mill. Estate also recorded the RSPO FFB administration.
4. Training and Monitoring Program for SCCS activities at PT ASM for the 2018/2019 period
5. Data on FFB receipts from each supplier which includes the Farmer / Cooperative Group.
6. List of areas that are certified and not PT ASM certified which explain Blocking, Planting Year and area.

Verification 1 November 2018

Can be shown corrective evidence in the form of an minutes of field activities FFB separation from certificates and non-certificates area in Bengkuang Raya Estate, Belaban Raya Estate and Pembangunan Raya Estate 31 October 2018, where marking is done is by staining oil palm plants and installing auxiliary markers for certification and non-certification area separators

Regarding the corrective evidence that addressed, the auditor considered that there was a need to field observation

Verification, 13 November 2018

Based on the results of a field visit on the Palm oil mill on November 12, 2018 it is known that:

- Can be simulated for FFB receipts from areas included in the scope of certification and out the scope of certification
- Can be simulated calculation of FFB, CPO and PK production from areas including the scope of certification
- list of blocks or areas included in the scope of certification

In addition, based on the results of the sample field visit at the Raya Estate Development Block A12 / A13, Bengkuang Raya Estate Blok B37, C31 and Belaban Raya Estate Blok F67 it is known that

- Marking has been carried out between the areas included in the scope of the certification and beyond the scope of the certification in the form of Paint on the principal of oil palm
- Marking has been done with auxiliary stakes with a distance between stakes \pm 50 meters each
- Can be simulated mechanism of harvesting, collection of FFB and transportation of FFB produced

Based on Root Cause Analysis, Correction, Corrective Action and corrective evidence that addressed, the non conformity on this indicator Stated Closed

Verified by	:	Moh Arif Yusni
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NCR No.	: 2018.04	Issued by	: Moh Arif Yusni
Date Issued	: 07 September 2018	Time Limit	: 06 September 2019
NC Grade	: Major	Date of Closing	: 13 November 2018
Standard Ref. & Requirement	: 4.1.4 Records of the origins of all third-party FFB sourced (collector, deliver, Cooperative, Farmers Association and outgrower) shall be available.		
Evidence observed (filled by auditor): However, based on document review and field observation, it was known that there were area for about ±1,427.11 ha which not included on the scoop of certification (non-certified), but still managed under PT Agro Sejahtera Manunggal management. Those area were divided into ±299.50 ha in Belaban Raya Estate, ±604.98 ha in Bengkuang Raya Estate, ±522.63 ha in Pembangunan Raya Estate and ±40.47 ha in KUD Agri Seriam Mandiri. Regarding this matters, company management was not be able to shows that any records related to oil palm agronomy and environment management for example fertilizer and pesticide consumption and Green House Gasses calculation, etc. were been separated towards certified and non-certified area. Thus, mechanism of documentation for certified and non-certified area is not available			
Non-Conformance Description (filled by auditor): Mechanism of documentation for certified and non-certified area is not available			
Root Cause Analysis (filled by organization audited): Lack of understanding of Unit Manager related to the mechanism for documenting the boundary map of the RSPO certificate scope for the HGU area in each Work Unit according to their scope of responsibility and the application of identification of each RSPO certified Estate that is equipped with block numbers and verification of certified FFB in each FFB delivery notes which were accepted by PRYM			
Correction (filled by organization audited): 1. Preparation of documentation and identification of boundary procedures in the field for the scope of RSPO certification and non-RSPO certification areas in each Unit: BRYE, BKYE, PRYE, KUD Agro Semesta. 2. Provision of boundary documentation in the field for the scope of RSPO certification and areas that are not RSPO certified in each Unit: BRYE, BKYE, PRYE, KUD Agro Semesta 3. providing evidence of the results of verification of RSPO certified FFB and non-RSPO certified according to the prosedur Identifikasi dan Kemampuan Telusur Produk.			
Corrective Action (filled by organization audited): 1. Implementation of the Product Tracing & Capability Identification procedure (documentation / recording mechanism related to the area in accordance with the scope of the certification described in this procedure). 2. Implementation of Internal Audit and Management Review.			
Assessor Evaluation and Conclusion (filled by auditor): Verification 12 October 2018 The company submits corrective evidence in the form of: 1. Separation mechanism for certified and non-certified FFB (ASM Document No. - SUST-GDN-01), in the mechanism explains related to <ul style="list-style-type: none">- Marking the boundaries of certified FFB areas with those not certified- Verification of mill is related to the source of FFB from the unit (certified or not)			

2. Certified and non-certified FFB separation mechanism training report to the PT ASM Estate Administration and Mill which was held on October 5, 2018
3. Internal Office Memo No. 001 / ASM-SUST / X / 2018 dated October 1, 2018 from the Area controller 7A Regarding the RSPO PT ASM FFB Separation Commitment which explained that to all PT ASM managers to:
 - Conduct an inventory of certified blocks in PT ASM's HGU.
 - Administration of FFB production administration in certified blocks starting from RSPO FFB delivery notes (See RSPO Estate Block attachment) to the Mill. The RSPO FFB delivery notes that was accepted due to the weigh of the FFB was then separated & the administration of RSPO FFB registration by the Mill. Estate also recorded the RSPO FFB administration.
4. Training and Monitoring Program for SCCS activities at PT ASM for the 2018/2019 period
5. Data on FFB receipts from each supplier which includes the Farmer / Cooperative Group.
6. List of areas that are certified and not PT ASM certified which explain Blocking, Planting Year and area.

Verification 1 November 2018

Can be shown corrective evidence in the form of an minutes of field activities FFB separation from certificates and non-certificates area in Bengkuang Raya Estate, Belaban Raya Estate and Pembangunan Raya Estate on 31 October 2018, where marking is done is by staining oil palm plants and installing auxiliary markers for certification and non-certification area separators

Regarding the proof of improvement sent by the team, the auditor considered that there was a need to field observation

Verification, 13 November 2018

Based on the results of a field visit on the Palm oil mill on November 12, 2018 it is known that:

- Can be simulated for FFB receipts from areas included in the scope of certification and out the scope of certification
- Can be simulated calculation of FFB, CPO and PK production from areas including the scope of certification
- list of blocks or areas included in the scope of certification

In addition, based on the results of the sample field visit at the Pembangunan Raya Estate Block A12 / A13, Bengkuang Raya Estate Blok B37, C31 and Belaban Raya Estate Blok F67 it is known that

- Marking has been carried out between the areas included in the scope of the certification and beyond the scope of the certification in the form of Paint on the principal of oil palm
- Marking has been done with auxiliary stakes with a distance between stakes \pm 50 meters each
- Can be simulated mechanism of harvesting, collection of FFB and transportation of FFB produced

Based on Root Cause Analysis, Correction, Corrective Action and corrective evidence that addressed, the non conformity on this indicator Stated Closed

Verified by : **Moh Arif Yusni**

NCR No.	: 2018.05	Issued by	: Mohamad Amarullah
Date Issued	: 07 September 2018	Time Limit	: 06 September 2019
NC Grade	: Major	Date of Closing	: 13 November 2018
Standard Ref. & Requirement	: 4.3.4 Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place.		

Evidence observed (filled by auditor):

Based on soil map of PT ASM dated August 18th 2015 review, it was known that there were presence of peat area in BRYE and BLRE for about 279.71 ha and 803.25 ha, respectively. Furthermore, based on field observation and document related to peat management verification, it was noted several points as follows:

- Evaluation towards peat subsidence were not available. According to peat subsidence monitoring record in BLRE, it was known that subsidence rate was about 0.66 cm/month or ± 7.92 cm/year.
- Evaluation towards water table measurements were not available. According to piezometer monitoring record, it was known that water table from June to July and from July to August were significantly decrease/drop for about 28 cm and 45 cm, respectively.
- Monitoring and evaluation on water level measurement were not available.
- As observed to Division 2 Block F50 BLRE and Division 3 Block C46 BRYE, it was known that scale on water level measurement stick were not clear (cannot be read).
- As observed to flapgate in Division 2 Block F50 BLRE, it was known that the flapgate was not able to maintain water level at 60 to 80 cm.

Non-Conformance Description (filled by auditor):

The company is not be able to shows evidence that peat soil subsidence has been minimized by estate management.

Root Cause Analysis (filled by organization audited):

Lack of control from the Assistant Agronomy & Assistant Research regarding the implementation of monitoring & measuring subsidence of peat land & water levels in the BLRE Unit as a whole.

Correction (filled by organization audited):

1. Repair the installation of water level measurements are clearly legible and infrastructure repair & installation flapgate dykes to control the ground water level is between 50-60 cm.
2. Provision of evidence recording the results of monitoring and measurement and evaluation of peat soil subsidence and water level in the areas that have been identified.

Corrective Action (filled by organization audited):

Periodically carry out management reviews for water management & peatland management programs by Unit Manager.

Assessor Evaluation and Conclusion (filled by auditor):
Verification 23 October 2018

The company submits corrective evidence in the form of:

- Installation and manufacture of Subsidence Pole, Piezometer, Water Level and Water Bulkhead in Block E 64 BRYE, along with monitoring
- Installation and manufacture of Subsidence Pole, Piezometer, Water Level and Water Bulkhead in Block G 62 BLRE, along with monitoring

Regarding the corrective evidence that addressed, the NCR in this indicator are not yet closed, the company needs to complete with

- Map of the location of the flapgate / embankment to control the groundwater level between 50 - 60 cm in the operational area of PT ASM
- Map of location of subsidence pole, piezometer and water level in the operational area of PT ASM Program dan realisasi perbaikan tanggul / flapgate di areal operasoinal PT ASM

Verification 1 November 2018

The company submits corrective evidence in the form of:

- Map of the location of the flapgate / embankment to control the groundwater level between 50 - 60 cm in the operational area of PT ASM

- Map of location of subsidence pole, piezometer and water level in the operational area of PT ASM Program dan realisasi perbaikan tanggul / flapgate di areal operasoinal PT ASM
- Program and the realization of improvement embankment / flap gate / water gate in the PT ASM operational area for 218 years

Based on Root Cause Analysis, Correction, Corrective Action and corrective evidence that addressed, the non conformity on this indicator Stated Closed

Verified by : **Moh Arif Yusni**

NCR No.	: 2018.06	Issued by	: Steve Mualim
Date Issued	: 7 September 2018	Time Limit	: 06 September 2019
NC Grade Grade	: Major	Date of Closing	: 26 October 2018
Standard Ref. & Requirement	: 4.6.6 Storage of pesticides shall be according to recognised best practices. All pesticides containers shall be properly managed according to the existing regulations and or instructions enclosed on the containers		
Non-Conformance Description & Evidence observed (filled by auditor): Meanwhile field visit on BLRE housing found that one of those housing are being used as pesticides store. Procedure ASM-SUST-SOP-14 on 2015 are clearly states that all chemical store must be located far away from workers housing. Regardig this, company are not able to shown proper ways for pesticides storage based on current procedures.			
Non-Conformance Description (filled by auditor): company are not able to shown proper ways for pesticides storage based on current procedure			
Root Cause Analysis (filled by organization audited): Lack of understanding of the Unit in managing chemicals in accordance with the Chemical Management Procedure.			
Correction (filled by organization audited): 1. Provision Warehouses Chemicals decent. 2. Transfer, storage & handling of chemicals in the new Chemical Warehouse according to the Chemical Management Procedure. 3. Socialization SOP Management of Chemicals by HSE Officer to all employees involved.			
Corrective Action (filled by organization audited): HSE Inspection by HSE Officer regularly.			
Assessor Evaluation and Conclusion (filled by auditor): Verification, 26 October 2018 The company submits corrective evidence in the form of: - Documentation of building a Pesticide Warehouse in Belaban Raya Estate which is separate from housing. The warehouse has been equipped with supporting infrastructure facilities such as MSDS, Pallets, and First Aid Box - Minutes of transfer of pesticide material from G6 Building Warehouse to the new Pesticide Warehouse on October 25, 2018			

- socialization of SOP for Pesticide Management at Belaban Raya Estate on October 25, 2018 with a total of 28 participants, consisting of Spray Officers, Assistant and Warehouse Officers

Based on Root Cause Analysis, Correction, Corrective Action and corrective evidence that addressed, the non conformity on this indicator Stated Closed

Verified by : **Moh Arif Yusni**

NCR No.	: 2018.07	Issued by	: M. Amarullah
Date Issued	: 7 September 2018	Time Limit	: 06 September 2019
NC Grade Grade	: Major	Date of Closing	: 15 October 2018
Standard Ref. & Requirement	4.6.11 Annual medical records of pesticide operators, and follow-up treatment of medical results, shall be available		
Evidence observed (filled by auditor): Based on the results of interviews with pesticide applicators in all estates, it was known that the company had carried out special health checks two (2) times a year and interviews with paramedic officers obtained information carried out in March 2018. Related to this evidence of implementation of health inspection activities and follow-up to the results of the health examination cannot yet be shown.			
Non-Conformance Description (filled by auditor): Not yet shown evidence of medical check-up realization and evaluation document.			
Root Cause Analysis (filled by organization audited): The lack of effective control of recordings related to the results of employee health checks in each estate/mill. MCU recording controls that are ineffective at PT. ASM as a whole due to the following: <ol style="list-style-type: none"> 1. Doctors who have carried out MCU for most employees one (1) month prior to the RSPO stage-2 audit of PT. ASM is transferred from the West Kalimantan region to the Central Kalimantan region. 2. The MCU data is filed by the Medical Staff and 2 weeks before the RSPO audit is taking place, the Medical Officer resigns and hand over the work to the new Medical Officers (who still new and lack of communication). 3. Responding to MCU recording control of PT. ASM, a management review was carried out on September 7, 2018 and was decided by the Regional Head & Area Controller as follows: <ol style="list-style-type: none"> a) Re-conducted MCU which was coordinated by Doctor Donny (new medical staff). b) MCU copies of employees controlled by Sustainability Staff who act as RSPO & ISPO Document Control PT. ASM. c) Explanation of the importance of controlling the recording of this MCU to the new Medical Persons by Mr. Diar and also to the participants of this ASM management review meeting. 			
Note: RSPO & ISPO PT ASM Management review meeting on point No. 3 take place after RSPO & ISPO closing meeting which has been done by auditors of PT Mutuagung Lestari on 7 September 2018.			
Correction (filled by organization audited): Related Estate Manager coordination with company doctor for provision the document of MCU and its evaluation based on doctor recommendation.			
Corrective Action (filled by organization audited):			

Implementation of Audit Internal & Management Review.

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

Verification 12 October 2018

Company has shown:

- Medical Check Up document for all workers which has been done on 28 September 2018, where check up covers cholinesterase, Audiometry and Spirometry.
- MCU Document Control Decree.

Based on these explanations, Nonconformity has not been fulfilled, PT ASM needs to clarify with regard to the root of the problem regarding to further clarification regarding "lack of effective recording control". Is it due to PICs that do not yet understand, or control systems (SOPs) that have not been effective.

Verification 15 October 2018

Based on clarification evidence which has been done by management, accordingly the Non-conformity has been fulfilled.

Verified by : **Moh Arif Yusni**

NCR No.	: 2018.08	Issued by	: M. Amarullah
Date Issued	: 7 September 2018	Time Limit	: 06 September 2019
NC Grade Grade	: Major	Date of Closing	: 15 October 2018
Standard Ref. & Requirement	: 4.7.1 A health and safety policy shall be in place. A health and safety plan shall be documented and implemented, and its effectiveness monitored.		
Evidence observed (filled by auditor): based on the results of interviews with workers in POM, it was known that the company had carried out special health checks two (2) times a year and interviews with paramedic officers obtained information carried out in March 2018. Related to this evidence of implementation of health inspection activities and follow-up to the results of the health examination cannot yet be shown.			
Non-Conformance Description (filled by auditor): Not yet shown evidence of medical check-up realization and evaluation document.			
Root Cause Analysis (filled by organization audited): The lack of effective control of recordings related to the results of employee health checks in each estate/mill. MCU recording controls that are ineffective at PT. ASM as a whole due to the following: 1. Doctors who have carried out MCU for most employees one (1) month prior to the RSPO stage-2 audit of PT. ASM is transferred from the West Kalimantan region to the Central Kalimantan region. 2. The MCU data is filed by the Medical Staff and 2 weeks before the RSPO audit is taking place, the Medical Officer resigns and hand over the work to the new Medical Officers (who still new and lack of communication). 3. Responding to MCU recording control of PT. ASM, a management review was carried out on September 7, 2018 and was decided by the Regional Head & Area Controller as follows: d) Re-conducted MCU which was coordinated by Doctor Donny (new medical staff). e) MCU copies of employees controlled by Sustainability Staff who act as RSPO & ISPO Document Control PT. ASM.			

- f) Explanation of the importance of controlling the recording of this MCU to the new Medical Persons by Mr. Diar and also to the participants of this ASM management review meeting.

Note:

RSPO & ISPO PT ASM Management review meeting on point No. 3 take place after RSPO & ISPO closing meeting which has been done by auditors of PT Mutuagung Lestari on 7 September 2018.

Correction (filled by organization audited):

Related Mill Manager coordination with company doctor for provision the document of MCU and its evaluation based on doctor recommendation.

Corrective Action (filled by organization audited):

Implementation of Audit Internal & Management Review.

Assessor Evaluation and Conclusion (filled by auditor):

Verification 12 October 2018

Company has shown:

- Medical Check Up document for all workers which has been done on 28 September 2018, where check up covers cholinesterase, Audiometry and Spirometry.
- MCU Document Control Decree.

Based on these explanations, Nonconformity has not been fulfilled, PT ASM needs to clarify with regard to the root of the problem regarding to further clarification regarding "lack of effective recording control". Is it due to PICs that do not yet understand, or control systems (SOPs) that have not been effective.

Verification 15 October 2018

Based on clarification evidence which has been done by management, accordingly the Non-conformity has been fulfilled.

Verified by : Moh Arif Yusni

NCR No.	: 2018.09	Issued by	: Moh Arif Yusni
Date Issued	: 7 September 2018	Time Limit	: 06 September 2019
NC Grade Grade	: Major	Date of Closing	: 19 December 2018
Standard Ref. & Requirement	: 4.7.2 A documented risk assessment shall be available and its implementation shall be recorded.		
Evidence observed (filled by auditor): based on the results of the document review, it is known that there are several activities / activities in the field that have not identified potential hazards and risks, for example, but are not limited to: <ul style="list-style-type: none">• Potential Danger/Hazards for fertilizer storage activities• Potential Danger/Hazard for activities in Chemical Warehouses / pesticides• Potential Danger/Hazard for activity at the refueling site Based on the results of field visits it was found that there were several risk controls that had not been implemented, for example: <ul style="list-style-type: none">• Found operators in sterilizer station, kernel station, boiler station, clarification stations do not use ear			

protectors <ul style="list-style-type: none"> Found security who smoked around the area of the Solar Tank in Bengkuang Raya Estate Found a dump truck driven by an unauthorized employee in Division 1 of Pembangunan Raya Estate (Unloading Workers).
Non-Conformance Description (filled by auditor): HIRAC Document not include all of the activities in company operational area
Root Cause Analysis (filled by organization audited): Lack of HSE Officer control related to HIRAC for overall operation in BRYE for fertilizer storage, chemical handling (pesticides), solar refueling and Safety Awareness for employees working safely (Unsafe action) and lack of PRYM HSE Officer control in safety awareness (PPE use).
Correction (filled by organization audited): 1. Completing the HIRAC document for fertilizer storage, handling chemicals (pesticides), refuelling diesel activities at BRYE by HSE Officer. 2. Safety Briefing for Safe Working Procedure to all identified employees who carrying out unsafe actions during the RSPO audit by the Auditor.
Corrective Action (filled by organization audited): 1. HIRAC socialization for activities: storage of fertilizers, handling of chemicals (pesticides), refuelling of diesel fuel, driver dump trucks to all employees related by HSE Officer BRYE and HIRAC socialization / factory operations by HSE Officer PRYM. 2. HSE Officer inspections of HSE Officers at each Work Unit periodically.
Assessor Evaluation and Conclusion (filled by auditor): Verification 19 December 2018 The company shows the following documents: - Socialization record of Smoking Prohibition. - Records of affirmation socialization to Dump Truck driver - Records of PPE socialization - The latest HIRAC document that contains refueling activities, storage of fertilizers and pesticides Based on the document review, Nonconformities have been fulfilled and will be observed regarding consistency in the field in the next assessment activities.
Verified by : Moh Arif Yusni

NCR No.	:	2018.10	Issued by	:	Steve Mualim
Date Issued	:	7 September 2018	Time Limit	:	ASA-1
NC Grade Grade	:	Minor	Date of Closing	:	09 October 2018
Standard Ref. & Requirement	:	5.2.4 Once the management plan is prepared, continuous monitoring documentation and report regarding the status of the RTE and HCVs are affected by the operations of the plantation and palm oil mill shall be available, and the results of monitoring are to be used to follow-up on the improvement of the management plan.			
Evidence observed (filled by auditor):					

Company have established 2017-2018 HCV management plan and Internal memo No 002/AM-SUST/05/2018 from Area Controller 7A clearly stated that HCV monitoring are conducted every month. Current HCV monitoring were conducted every 2 months.

Non-Conformance Description (filled by auditor):

Regarding this, company are not able to show proper HCV monitoring implementation based on HCV management plan and Area Controller internal memo (every 1 month)

Root Cause Analysis (filled by organization audited):

The lack of control by the Assistant Agronomy in each Estate is related to the consistency of the implementation of internal office memo No. 002 / AM-SUST / 05/2018 May 31, 2018 from Area Controller 7A

Correction (filled by organization audited):

Provision of evidence of HCV monitoring & patrol results every month since September and the following month by HCV Officers

Corrective Action (filled by organization audited):

Management reviews regularly by Unit Manager related and quarterly verification by the Sustainable Region.

Assessor Evaluation and Conclusion (filled by auditor):

Verification 09 October 2018

The company showed internal office memo No. 002 / ASM-SUST / 05/2018 dated May 31 2018 from Area Controller 7a to all PT ASM managers regarding the commitment of PT ASM HCV management whose one point (point number 7) explained that routine patrol would be carried out every month monitor include:

1. Destruction of HCV areas so that they affect the existing ecosystem
2. Environmental pollution that has an impact on existing flora or fauna
3. Identification of animals found during patrol

In addition, the company also showed a memorandum to June 1 2018 from Area Controller 7a regarding the appointment and appointment of HCV PT ASM officers with a job desk to monitor HCV.

Periodic evidence of monitoring every month in accordance with the HCV management plan has also been shown for each estate, for example, the October 2018 period for the Pembangunan Raya estate, Belaban Raya estate, and Bengkuang Raya estate. Monitoring is carried out by HCV officers and contains HCV area conditions, HCV signboard conditions, types of wildlife encountered, etc.

Based on Root Cause Analysis, Correction, Corrective Action and corrective evidence that addressed, the non conformity on this indicator Stated Closed

Verified by : **Steve Mualim**

NCR No.	: 2018.11	Issued by	: Moh Arif Yusni
Date Issued	: 7 September 2018	Time Limit	: 06 September 2019
NC Grade Grade	: Major	Date of Closing	: 13 November 2018
Standard Ref. & Requirement	: 6.5.2 Collective Labor Agreement/Company Regulation, in accordance with the manpower regulations, shall be available in understandable language; and explained by the management or Labor Union to the workers.		
Evidence observed (filled by auditor): Based on the results of the review of the employee premium list document and payroll in June & July 2018 it is known that there are workers who work on holidays / weekend. Related to this, the company has provided compensation in the form of overtime / premium with varying values for example			

- Finding wood activity with overtime compensation of 1 HK (Rp. 102,480)
- Security officer with 8 hours of compensation paid Rp. 195,145, -

Meanwhile in the Minister of Manpower and Transmigration Decree no. 102 of 2004 concerning Overtime and Overtime Work Wages, clause 11 on how to calculate overtime wages, section (b) which states: "If overtime is done on weekly rest days and / or official holidays for 6 (six) working hours working days 40 (forty) hours a week then (b.1.) calculation of overtime wages for the first 7 (seven) hours paid 2 (two) times wages, and the eighth hour paid 3 (three) times wages an hour and overtime ninth and tenth are paid 4 (four) times an hour.

Non-Conformance Description (filled by auditor):

Mechanism of overtime wage calculation not suitable with government regulation.

Root Cause Analysis (filled by organization audited):

Lack of understanding regarding government regulation compliance on *Decision of the Minister of Labor and Transmigration no. 102 of 2004*

Correction (filled by organization audited):

1. Issuance of IOM by Area Controller for Mechanism of calculating employee wages for weekdays / holidays in accordance with *Decision of the Minister of Labor and Transmigration no. 102 of 2004*
2. Provision of evidence of payment records for overtime work performed by employees in accordance with *Decision of the Minister of Labor and Transmigration no. 102 of 2004*
3. Conduct socialization related to the calculation of overtime

Corrective Action (filled by organization audited):

Implementation of Audit Internal & Management Review.

Assessor Evaluation and Conclusion (filled by auditor):
Verification 6 October 2018

Please attach the IOM Issuance that has been received, sign and socialize to all levels of PT ASM employees along with the corrective action documents mentioned above.

Verification 10 November 2018

Can be shown corrective evidences in the form of:

- Internal Office Memo No. 127 / IOM / RH-Reg4B / X / 2018 dated 10 October 2018 RSPO Findings on Premium Calculation Difference which explains that:

1. Difference in the calculation of premiums to be paid will follow according to the provisions of applicable laws
2. Henceforth the security workers / other job premium calculation based on time follows in accordance with applicable regulations

- Letter Minutes of IOM socialization of PT Agro Sejahtera Manunggal's Premium Security Calculation on November 9, 2018
- Premium calculation clarification minutes / employees working on Sundays / Holidays
- Letter Minutes / proof of payment for security premium calculations on Holidays / Sundays

Regarding the corrective evidence which has been send, non-compliance with this indicator is stated to have not been fulfilled, additional evidence is needed in the form of:

- The procedure for calculating overtime that is converted into a premium

Verification 13 November 2018

Can be shown corrective evidences in the form of:

- Letter Minutes of socialization of writing system working hours on holidays dated November 8, 2018.
- Internal Office Memo No. 004 / ASM-Sust / XI / 2018 regarding Overtime Day Work Writing which explains that:
 1. Each unit must refer to *Decision of the Minister of Labor and Transmigration no. 102 of 2004* concerning Working Time and Overtime Wages
 2. Calculations and Writing calculation of overtime work hours on holidays should be in accordance with *Decision of the Minister of Labor and Transmigration no. 102 of 2004* concerning Working time and Overtime Wages.

Based on the corrective evidence, the Non-conformity has been fulfilled.

Verified by : **Moh Arif Yusni**

NCR No.	:	2018.12	Issued by	:	Steve Mualim
Date Issued	:	7 September 2018	Time Limit	:	ASA-1
NC Grade Grade	:	Minor	Date of Closing	:	12 October 2018
Standard Ref. & Requirement	:	6.5.3 Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where such public facilities are unavailable or inaccessible.			
Evidence observed (filled by auditor): based on the results of a field visit in the housing of PRYE, BLRE and BKRE employees, the condition of the drainage ditch was found to be inadequate (experiencing siltation) and found domestic waste which was placed not in its place (dumped into drainage). Meanwhile in the domestic waste management procedures owned by the company (No. Doc: ASM-SUST-SOP-47) where in clause 7.3.1 explains "All employees and workers in housing, offices and other work facilities are required to dispose of garbage in bins that have been provided."					
Non-Conformance Description (filled by auditor): There is not enough evidence the company provided adequate facilities for workers.					
Root Cause Analysis (filled by organization audited): Lack of awareness from employees & lack of control from HSE Officer related to domestic waste management which has an impact on environmental pollution.					
Correction (filled by organization audited): 1. Socialization of SOP for domestic waste management to all related employees. 2. Housing waste handling according to the management of domestic waste management.					
Corrective Action (filled by organization audited): Monthly inspection of safety, health, environment and Housekeeping by HSE Officer both at operational area and in employee housing.					

Assessor Evaluation and Conclusion (filled by auditor):
Verification 12 October 2018

The company has shown the following documents:

- Socialization Records of Waste Management & Waste Cleaning in PRYE.
- Socialization Records of Domestic Waste Management & garbage cleanliness Procedure at BLRE.
- Socialization Records of Domestic Waste Management & garbage cleanliness Procedure at BRYE.

Based on the document review, Nonconformities have been fulfilled and will be observed regarding consistency in the field in the next assessment

Verified by : **Moh Arif Yusni**

NCR No.	: 2018.13	Issued by	: Steve Mualim
Date Issued	: 7 September 2018	Time Limit	: 06 September 2019
NC Grade Grade	: Major	Date of Closing	: 27 October 2018
Standard Ref. & Requirement	: 7.3.1 There shall be evidence that no new plantings have replaced primary forest, or any area required to maintain or enhance one or more High Conservation Values (HCVs), since November 2005. New plantings shall be planned and managed to best ensure the HCVs identified are maintained and/or enhanced (see Criterion 5.2).		
Evidence observed (filled by auditor): Document review found that company are perform land clearing after November 2005 without preceded HCV assessment. Regarding this, company shown LUCA, that covered 5,630 ha areas on 2016. Meanwhile audit scope for this ST-2 assessment are ±7085.49 Ha, therefore there is ± 1,455.49 Ha areas were not included on current LUCA.			
Non-Conformance Description (filled by auditor): Company are not able to shown land use change analysist for entire operational areas (±7085.49 Ha) for areas that developed/cleared without preceded HCV assessment since 2005 and RaCP that approved by RSPO			
Root Cause Analysis (filled by organization audited): Lack of coordination between Head Office Sustainability Corporate Personnel in providing LUCA documents for smallholders of PT. ASM			
Correction (filled by organization audited): 1. Compliance & Certification Department coordinates with PIC (Sustainability Corporate Specialist) to immediately prepare LUCA documents for smallholders of PT. ASM and send the LUCA ASM document to the RSPO HCV compensation Panel and follow-up the suitability of the LUCA smallholders document PT. The ASM was to PIC on the RSPO HCV Compensation Panel. 2. Provision of LUCA smallholders documents PT. ASM to MAL Auditors.			
Corrective Action (filled by organization audited): Increasing intense coordination & communication with both the BGA's internal corporate sustainability and with the RSPO Secretariat.			
Assessor Evaluation and Conclusion (filled by auditor): Verification 23 October 2018 The company submits corrective evidence in the form of: - Land use change Analysis of Review Report for Plasma PT Agro Sejahtera Manunggal. - PT ASM's data submission of smallholder scheme to RSPO on September 27, 2018 with conclusion FCL is 0 with 2.44 ha for remediation.			

- Evidence of BGA (Sustainability Specialist) Communication with RSPO on 19 October 2018 (email from RSPO to BGA) regarding LUCA review report - BUMITAMA - PT ASM.

Based on Root Cause Analysis, Correction, Corrective Action and corrective evidence that addressed, the non conformity on this indicator Stated Closed.

Panel 11 January 2019

The company is not be able to shows approval for RaCP from RSPO Secretariate for all certification scope area. Thus, this NCR is considered remain **open**.

16 March 2019

Company management has officially stated through email dated 16 March 2019 which mentioned that scope of audit for Inti will be deducted from previously 5,630.20 ha, to become 4,861.48 ha (after liability for about 768.72 ha), with detail is presented in the following Table:

Area Description	Owned Estate (Inti) – ha	
	Certified Scope	Liability
2009 Planted Area	1,553.39	-
2010 Planted Area	2,818.23	403.50
2011 Planted Area	83.14	319.02
2012 Planted Area	19.05	3.44
Infrastructure and others	387.67	42.76
Total	4,861.48	768.72

Based on explanation above, NCR No. 2018.13 is stated **closed**.

Verified by : **Moh Arif Yusni**

NCR No.	: 2018.14	Issued by	: Moh Arif Yusni
Date Issued	: 7 September 2018	Time Limit	: 6 September 2019
NC Grade Grade	: Major	Date of Closing	: 13 November 2018
Standard Ref. & Requirement	SCCS Module E for CPO Mills: Mass Balance E.3.2 The site shall have documented procedures for receiving and processing certified and non-certified FFBs.		
Evidence observed (filled by auditor): Based on the results of the document review, a field visit revealed that there was an area of ± 1,427.11 Ha of the area not included in the scope of the certification and under the management of each estate namely Belaban Raya Estate ± 299.50 Ha, Bengkuang Raya Estate ± 604.98 Ha and Pembangunan Raya Estate ± 522.63 Ha. The results of field visits and document verification are known that some of these areas are located in the same block as the nucleus estate (certification area) for example in Block H71, I72 Belaban Raya Estate; Block B39, B40 Bengkuang Raya Estate and A17, A18 Pembangunan Raya Estate. Meanwhile, in the procedure of SCCS (ASM-SUST-SOP-43 revision 01 November 24 2017), it is stated that the status of raw materials (POM) originating from RSPO-certified plantations is marked by the use of CSPO Stamps on each fruit letter. Related to this, the company has not been able to show the evidence			

- Mechanisms and implementation in the field related to RSPO-certified and non-certified FFB separation, especially in blocks whose area is divided into two certified or not certified areas.
- Method of recording / documenting the receipt of certified and non-certified FFB in the Pembangunan Raya POM

Non-Conformance Description (filled by auditor):

the company has not been able to show the evidence

- Mechanisms and implementation in the field related to RSPO-certified and non-certified FFB separation, especially in blocks whose area is divided into two certified or not certified areas.
- Method of recording / documenting the receipt of certified and non-certified FFB in the Pembangunan Raya POM

Root Cause Analysis (filled by organization audited):

Lack of control from the Estate Manager related to the application of identification of RSPO & non-RSPO certified areas that have not been identified through clear boundaries with their block numbers and identification of certified FFB on each FFB Delivery not from Harvest Staff and verification of certified FFB and which is not certified by the weightbridge operator

Correction (filled by organization audited):

1. Preparation of documentation and identification of boundary procedures in the field for the scope of RSPO certification and non-RSPO certification areas in each Unit: BRYE, BKYE, PRYE, KUD Agro Semesta.
2. Provision of boundary documentation in the field for the scope of RSPO certification and areas that are not RSPO certified in each Unit: BRYE, BKYE, PRYE, KUD Agro Semesta
3. providing evidence of the results of verification of RSPO certified FFB and non-RSPO certified according to the *Prosedur Identifikasi dan Kemampuan Telusur Produk*.

Corrective Action (filled by organization audited):

1. Implementation of the Product Tracing & Capability Identification procedure (documentation / recording mechanism related to the area in accordance with the scope of the certification described in this procedure)
2. Implementation of Internal Audit and Management Review.

Assessor Evaluation and Conclusion (filled by auditor):

Verification 12 October 2018

The company submits corrective evidence in the form of:

1. Separation mechanism for certified and non-certified FFB (ASM Document No. - SUST-GDN-01), in the mechanism explains related to
 - Marking the boundaries of certified FFB areas with those not certified
 - Verification of mill is related to the source of FFB from the unit (certified or not)
2. Certified and non-certified FFB separation mechanism training report to the PT ASM Estate Administration and Mill which was held on October 5, 2018
3. Internal Office Memo No. 001 / ASM-SUST / X / 2018 dated October 1, 2018 from the Area controller 7A Regarding the RSPO PT ASM FFB Separation Commitment which explained that to all PT ASM managers to:
 - Conduct an inventory of certified blocks in PT ASM's HGU.
 - Administration of FFB production administration in certified blocks starting from RSPO FFB delivery notes (See RSPO Estate Block attachment) to the Mill. The RSPO FFB delivery notes that was accepted due to the weigh of the plant was then separated & the administration of RSPO FFB registration by the Mill. Estate also recorded the RSPO FFB administration.
4. Training and Monitoring Program for SCCS activities at PT ASM for the 2018/2019 period
5. Data on FFB receipts from each supplier which includes the Farmer / Cooperative Group.
6. List of areas that are certified and not PT ASM certified which explain Blocking, Planting Year and area.

Verification 1 November 2018

Can be shown corrective evidence in the form of an minutes of field activities FFB separation from certificates and non-certificates area in Bengkuang Raya Estate, Belaban Raya Estate and Pembangunan Raya Estate on 31 October 2018, where marking is done is by staining oil palm plants and installing auxiliary markers for certification and non-certification area separators

Regarding the proof of improvement sent by the team, the auditor considered that there was a need to field observation

Verification, 13 November 2018

Based on the results of a field visit on the Palm oil mill on November 12, 2018 it is known that:

- Can be simulated for FFB receipts from areas included in the scope of certification and out the scope of certification
- Can be simulated calculation of FFB, CPO and PK production from areas including the scope of certification
- list of blocks or areas included in the scope of certification

In addition, based on the results of the sample field visit at the Pembangunan Raya Estate Block A12 / A13, Bengkuang Raya Estate Blok B37, C31 and Belaban Raya Estate Blok F67 it is known that

- Marking has been carried out between the areas included in the scope of the certification and beyond the scope of the certification in the form of Paint on the principal of oil palm
- Marking has been done with auxiliary stakes with a distance between stakes \pm 50 meters each
- Can be simulated mechanism of harvesting, collection of FFB and transportation of FFB produced

Based on Root Cause Analysis, Correction, Corrective Action and corrective evidence that addressed, the non conformity on this indicator Stated Closed

Verified by : **Moh Arif Yusni**

NCR No.	: 2018.15	Issued by	: Moh Arif Yusni
Date Issued	: 7 September 2018	Time Limit	: 6 September 2019
NC Grade Grade	: Major	Date of Closing	: 12 October 2018
Standard Ref. & Requirement	: Conformity Checklist of Certificate and Trademark Use		
Evidence observed (filled by auditor): PT Agro Sejahtera Manunggal has not received the RSPO Certificate. Based on the results of the document review, it is known that there is the use of RSPO Trademark in the Fruit Introductory Letter sent to the PKS from each Estate. This is not in accordance with the 2016 RSPO Rules on Market Communications And Claims (TRADEMARK LICENSING BODY; An organization cannot show the evidence has been authorized by the RSPO to issue licenses for the use of the RSPO trademark.).			
Non-Conformance Description (filled by auditor): PT ASM cannot show the evidence has had authorization from RSPO to use <i>Trademark</i> RSPO in accordance with <i>RSPO Rules On Market Communications And Claims 2016</i>			
Root Cause Analysis (filled by organization audited): The lack of control of documents by each Estate is related to the destruction or withdrawal of FFB Delivery letters that have the RSPO Logo for CSPO & CSPK products and apply identification of RSPO certified FFB in each FFB Delivery letter issued by the Estate in accordance with SOP of Product Identification & Capability.			

Correction *(filled by organization audited):*

Application of Product Search Identification & Ability SOP (mechanism for identifying & verifying RSPO certified FFB on each FFB Delivery letters).

Corrective Action *(filled by organization audited):*

Implementation of Internal Audit & Management Review.

Assessor Evaluation and Conclusion *(filled by auditor):*
Verification 12 October 2018

The company submits corrective evidence in the form of

1. Socialization FFB Certified Logo Changes on the FFB delivery notes on September 27, 2018 therein describes
 - The socialization of the change of the Certified FFB logo no longer uses the RSPO logo but is made a description of Certified FFB on all Estate
 - Withdrawal of FFB Delivery Letters that still use the RSPO logo on all Estate
2. Evidence FFB Delivery letter used which does not use the RSPO logo

Based on Root Cause Analysis, Correction, Corrective Action and corrective evidence that addressed, the non conformity on this indicator Stated Closed

Verified by : **Moh Arif Yusni**

3.5.3 Opportunity for Improvement

No	Ref. Std.	Description
1	1.1.1 Minor	Ensure the existence of environmental and social NGOs and be included in the stakeholder list. OFI No. 1
2	4.1.1 Major	The company is encourage to monitor and continue sanitation program, especially on VOP's, woodies and other weeds.
3	4.3.5 minor	The company has an opportunity to develop a drainability study for replanting on peat areas purposes.
4	4.6.5 Major	The company has encourage to make sure that PPE provided for pesticide applicators are in accordance with the MSDS.
5		

3.5.4 Noteworthy Positive Components

No	Ref Std	Descriptions
1		Good cooperative during audit
2		The company has commitment to implementation sustainability on oil palm plantation
3		good communication and team work

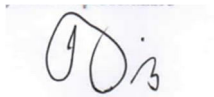

3.6 Summary of Arising Issues from Public and Auditor Verification

Public Issues (Institution/ NGO/Community)	Auditor Verification
Manpower and Transmigration Agency of Ketapang Regency Interviewee: Chief of Agency <ul style="list-style-type: none"> • There were no issues related to workers discrimination, child abuse, immigrant workers and gender matters. • The company was reportedd has implementing minimum wages of Ketapang Regency 2018. • Issuance of Operator Licenses were still ongoing progress. • The company has deliver regular reports such as P2K3 and WLTK to the Agency inline woth the schedule. • The company has registered labor union. 	<p>Has been verified on indicators 4.7, 6.5, 6.6, 6.7, 6.8, 6.9, 6.12 and 6.13.</p>
Environment Agency of Ketapang Regency Interviewee: Division Chief of Environment Protection and Management or Kabid. Perlindungan dan Pengelolaan Lingkungan Hidup (P2LH). <ul style="list-style-type: none"> • Communication with Agency was considered good, and any information requested were transparently provided by the company. • There is no negative issues related to environment towards mill and estate operational activities. Reports from surrounding communities nor NGO were never happened. • Regular report such as RKL/RPL, effluent, hazardous waste, etc., were delivered on schedule. • There is no extension or expansion of mill/estate operational areas. 	<p>Has been verified on indicators 2.1, 4.4, 5.1, 5.2</p>
Agriculture, Plantation and Animal Husbandry Agency of Ketapang Regency Interviewee: Division Chief of Plantation or Kabid. Perkebunan <ul style="list-style-type: none"> • Land conflict with surrounding communities either legal and customary were never happened (no issues). • Estate operational areas was in adjacent with <i>Cagar Alam</i> Muara Kendawangan. There is no overplanting has been reported from communities, NGO and Government Agencies. • Plasma Kemitraan/Smallholder (20 % from total Land Title) for about 1,372.00 ha + 280.00 ha with Cooperative Seriam Mandiri (not Full Manage). • Status of PT ASM operational areas was <i>APL</i> since the beginning of operations. • There is no expansion for estate operational areas. However, there is reported the Mill will increase its processing capacity into 60 ton FFB/hour. • Plantation Class for PT ASM was Class II (Good) or "<i>Kelas Kebun II (Baik)</i>" since December 28th 2017. This class was valid for three years. 	<p>Has been verified on indicators 2.1, 2.2, 2.3. 6.10, 6.11</p> <p>During field observation, documents verification and interview with cooperative obtained information if smallholders are full managed by PT ASM.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> There is no BRG or Peat Restoration Body within estate operational areas. Semester Plantation Development Report (LPUP/LKUP) was delivered on schedule. Report on fire were included on LPUP/LKUP. Total operational area reported were owned estate for about 6,629.00 ha and Plasma for about 1,320.00 ha, hence total area reported was 7,949.00 ha with Mill processing capacity about 45 ton FFB/hour. Annual CSR program meeting shall involving with surrounding Villages. There is no overlapping with customary rights of surrounding communities. 	
National Land Agency of Ketapang Regency Interviewee: - No interview	
Labor Agency (Head of Agency and Labor Technical Staff) Until now there has been no complaints from workers and stakeholders related to employment. However, respondents suggested conducting verification related to P2K3 license, employee status, employment contract, SIO operator, engine testing, BPJS Health and Holiday Allowances.	The auditor has verified related to licensing, OHS and Employment implementation.
Agro Seriam Mandiri Cooperative and Scheme Smallholders (Head of Cooperative and Scheme Smallholders; previous land owner) <ul style="list-style-type: none"> Total scheme smallholder area of 1320 Ha with 660 farmers. Scheme smallholders come from Seriam and Kendawangan villages. Contract Agreement on the developing of scheme smallholder plantations is fair, legal and transparent. Purchase of FFB scheme smallholders in line with prices referring to the Plantation Department of West Kalimantan Province. FFB price information has been socialized to cooperative and scheme smallholders. Until now there were no complaints regarding the price of FFB, payments were made on time and in line with the prices set by the government. 	There are no negative issues related to cooperation in the development of scheme smallholders. The company has complied with the RSPO standard related to the indicator 6.10.1 - 6.10.4 .
Seriam Village (Community Leader, Previous land owner) <ul style="list-style-type: none"> The company's HGU area was once traditional forest with rubber, rice and banana vegetation. 	There are no negative issues obtained from the community and traditional leaders. The Company has

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> Before the plantation development, the company had communicated with the villagers and made compensation There are other parties claiming that the company's HGU land has been compensated. Positive impacts of the company include: development of plasma plantations, employment and business opportunities, construction of road access, educational assistance, religious assistance, customary assistance, and others. Until now there are no negative issues about the environment 	<p>complied with the RSPO standard related to Criteria 2.2, 2.3, 4.4, 5.2, 5.3, 6.1, 6.11</p>
<p>Contractor of road maintenance</p> <ul style="list-style-type: none"> The company has a good relationship with local contractors The PPE are provided by the contractor (boots, helmets) Wages system is explained on the contract for each contractor. The medical and worker insurance is covered by contractor. The contractor aware about policy of code of ethic, human rights etc. 	<p>There was sighted sample of work contract between the company and local contractor. These document contain of information related to payment mechanism and another obligation for each party.</p>
<p>Gender Committee</p> <ul style="list-style-type: none"> Protection of reproductive rights have been met by the company, for example with the implementation of maternity leaves for a female employees with still to be paid their wages in full. Company also give permission for female worker to have lactating time Company has been socializing policies related to the prohibition of pregnant or breastfeeding workers work with chemicals. Gender committee has been socialized related to protection on female worker policies Female workers can take the menstruation leave by doctor recommendation letter. There is no issue related to sexual harassment and complaint related to discrimination. 	<ul style="list-style-type: none"> Based on interview with female workers, it is known that they have menstruation leave (H1), maternity and pregnant leaves for about 3 months. It is in accordance with criteria 6.9 Company has prohibited the pregnant female worker to work with chemical material. It is in accordance with indicator 4.6.12
<p>Bipartite Cooperation Interview with board of Bipartite Cooperation</p> <ul style="list-style-type: none"> Workers' salary is in accordance with Decree of Governor of Kalimantan Barat The company has registered all workers in Employment insurance. As for health insurance is covered by certificate holder. The company also recruit local communities as worker All complaint is delivered to the committee of bipartite cooperation and resolved by discussion between the worker 	<p>The management unit has demonstrated evidence of compliance with the RSPO P & C such as criterion 6.6.1, 6.5.1, 4.7.6</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>and bipartite cooperation.</p> <ul style="list-style-type: none"> • There is no casual worker 	

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> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;"> <p>PT Agro Sejahtera Manunggal Management Representative</p>  <p><u>Diar Hasymi Damanik</u> Monday, 18 March 2019</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><u>Moh Arif Yusni</u> Monday, 18 March 2019</p> </div> </div>

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

No	Institution/NGO/Community	Address	Phone/Email	Form of Communication	Date of Contact	Response	
						Yes	No
1	Manpower and Transmigration Agency of Ketapang Regency Interviewee: Chief of Agency and Technical Staff)	Ketapang District		Interview	03 th September 2018	√	
2	Environment Agency of Ketapang Regency Interviewee: Division Chief of Environment Protection and Management or <i>Kabid. Perlindungan dan Pengelolaan Lingkungan Hidup (P2LH)</i> .	Ketapang District		Interview	03 th September 2018	√	
3	Agriculture, Plantation and Animal Husbandry Agency of Ketapang Regency Interviewee: Division Chief of Plantation or <i>Kabid. Perkebunan</i>	Ketapang District		Interview	03 th September 2018	√	
4	National Land Agency of Ketapang Regency	Ketapang District		Interview	03 th September 2018		√
6	Agro Seriam Mandiri Cooperative and Scheme Smallholders (Head of Cooperative and Scheme Smallholders)	Ketapang District		Interview	04 th September 2018	√	
7	Seriam Village (Community Leader)	Ketapang District		Interview	04 th September 2018	√	
8	AMAN	-	rumahaman@bn.net.id	Questioner by email	28 August 2018		√
9	WALHI	-	informasi@walhi.or.id	Questioner by email	28 August 2018		√
10	Gender Committee	Ketapang District			04 th September 2018	√	
11	Local Contractor	Ketapang District			04 th September 2018	√	
12	Worker union	Ketapang District			04 th September 2018	√	

13	Pembangunan Raya Mill 17 Mill Workers	Ketapang District			04 th September 2018	√	
14	Belaban Raya Estate 21 Estate workers	Ketapang District			04 th September 2018	√	
15	Bengkuang Raya Estate 19 Estate Workers	Ketapang District			05 September 2018	√	
16	Pembangunan Raya Estate & Cooperative Agro Seriam Mandiri 22 Estate Workers	Ketapang District			06 September 2018	√	

Appendix 2. Assessment Program

DATE	03 – 08 September 2018	
PROGRAM	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 03 September 2018		
05.30 – 09.25	Jakarta → Pontianak → Ketapang	All Auditor
10.30 – 12.00	Stakeholders consultation to government agencies of Ketapang Regency	All Auditor
12.00 – 16.00	Traveling to Site	
16.00 – 16.30	Opening meeting <ul style="list-style-type: none"> Auditee Speech (Introduction of PIC, Profile of Certified Management Unit) Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification) 	All Auditor
16.30 – 17.00	Documents Review <ul style="list-style-type: none"> Review of previous (Initial assessment) findings Verification of Basic Information Mill and Estate Confirmation of Time Bound Plan Review of Partial Certification 	All Auditor
Tuesday, 04 September 2018		
08.30 – 12.00	Field Observation to Belaban Raya Estate Aspect to be verified : <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries); Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) Implementation of Occupational Health & Safety Aspect Implementation of Employment Procedure and Mechanism Aspect Observation of Workers Facilities (Housing, School, Worship Place). 	<ul style="list-style-type: none"> MAY MAH / BSH STM MAH / BSH SHL SHL
12.00 – 14.00	Break	All Auditor
14.00 – 17.00	Field observation to Pembangunan Raya Palm Mill: <ul style="list-style-type: none"> Supply Chain verification (FFB Receiving, Weighbridge, FFB Sorting, Processing Activity, Despatch CPO) Occupational Health & Safety Aspect (Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, POME Pond) Implementation of Employment Procedure and Mechanism Aspect 	<ul style="list-style-type: none"> MAY / MAH STM / BSH SHL
Wednesday, 05 September 2018		
08.00 – 12.00	Stakeholder consultation to affected communities surrounding the plantations. Interview with Gender Committee, Worker's Union, Worker's Cooperative (if any), Local Contractor (for Mill and Estate), Third Party Supplier	<ul style="list-style-type: none"> MAY BSH
08.00 – 12.00	Field Observation to Bengkuang Raya Estate Aspect to be verified : <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries); 	<ul style="list-style-type: none"> STM

	<ul style="list-style-type: none"> Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) Implementation of Occupational Health & Safety Aspect Implementation of Employment Procedure and Mechanism Aspect Observation of Workers Facilities (Housing, School, Worship Place). 	<ul style="list-style-type: none"> MAH STM SHL MAH SHL
12.00 – 14.00	Break	All Auditor
14.00 – 17.00	<ul style="list-style-type: none"> Verification of stakeholder consultation result and field visit. Document review and completing audit checklist. 	All Auditor
Thursday, 06 September 2018		
08.00 – 12.00	Field Observation to Pembangunan Raya Estate & KKPA Pembangunan Raya Aspect to be verified : <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries); Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) Implementation of Occupational Health & Safety Aspect Implementation of Employment Procedure and Mechanism Aspect Observation of Workers Facilities (Housing, School, Worship Place). 	<ul style="list-style-type: none"> MAY MAH / BSH STM MAH / BSH SHL SHL
12.00 – 14.00	Break	All Auditor
14.00 – 17.00	<ul style="list-style-type: none"> Verification of stakeholder consultation result and field visit. Document review and completing audit checklist. 	All Auditor
Friday, 07 September 2018		
08.00 – 09.30	<ul style="list-style-type: none"> Continue Field Observation to Estate; Mill and Public Consultation to Company surrounded village and community leader (if needed) Completion of checklist and RSPO & ISPO Document Review 	All Auditor
09.30 – 11.00	<ul style="list-style-type: none"> Verification of stakeholder consultation result and field visit. Document review and completing audit checklist. 	All Auditor
11.00 – 14.00	Internal discussion by auditor team preparing for Closing Meeting	All Auditor
14.30 – 15.30	Closing Meeting: <ul style="list-style-type: none"> Presentation of audit findings (Noteworthy Positive Component, Non Conformities, OFI, Timelie of CAR's, Conclusion)/ Comments, Responses and Questions 	All Auditor
16.00 – 20.00	PT ASM → Ketapang	All Auditor
Saturday, 08 September 2018		
07.30 –	Ketapang → Jakarta	All Auditor