

Roundtable on Sustainable Palm Oil Certification R S P O

[✓] Surveillance

Name of Management Organisation : Pondok Labu Palm Oil Mill, PT Paripurna Swakarsa subsidiary of Sime Darby Plantation Berhad
 Plantation Name : Binturung Estate, Sesulung Estate, Pondok Labu Estate, & Rampa Estate
 Location : Village of Pondok Labu, Sub District of Pamukan Selatan, District of Kotabaru, Province of Kalimantan Selatan, Indonesia
 Certificate Code : MUTU-RSPO/016
 Date of Initial Registration : 16 March 2012 Date of License Issue : 16 June 2019
 Date of Certificate Issue : 20 July 2017
 Date of Certificate Expiry : 15 March 2022 Date of License Expiry : 15 March 2020

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA 1.2	12 to 15 February 2019	Sandra Purba (Lead Auditor), Rizliani Aprianita Hsb, Yudhi Yuniarto T, Afiffuddin	Taufik Margani	Octo HPN Nainggolan

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA 1.2	11 June 2019

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FIGURE

Figure 1. Location Map of PT. Paripurna Swakarsa

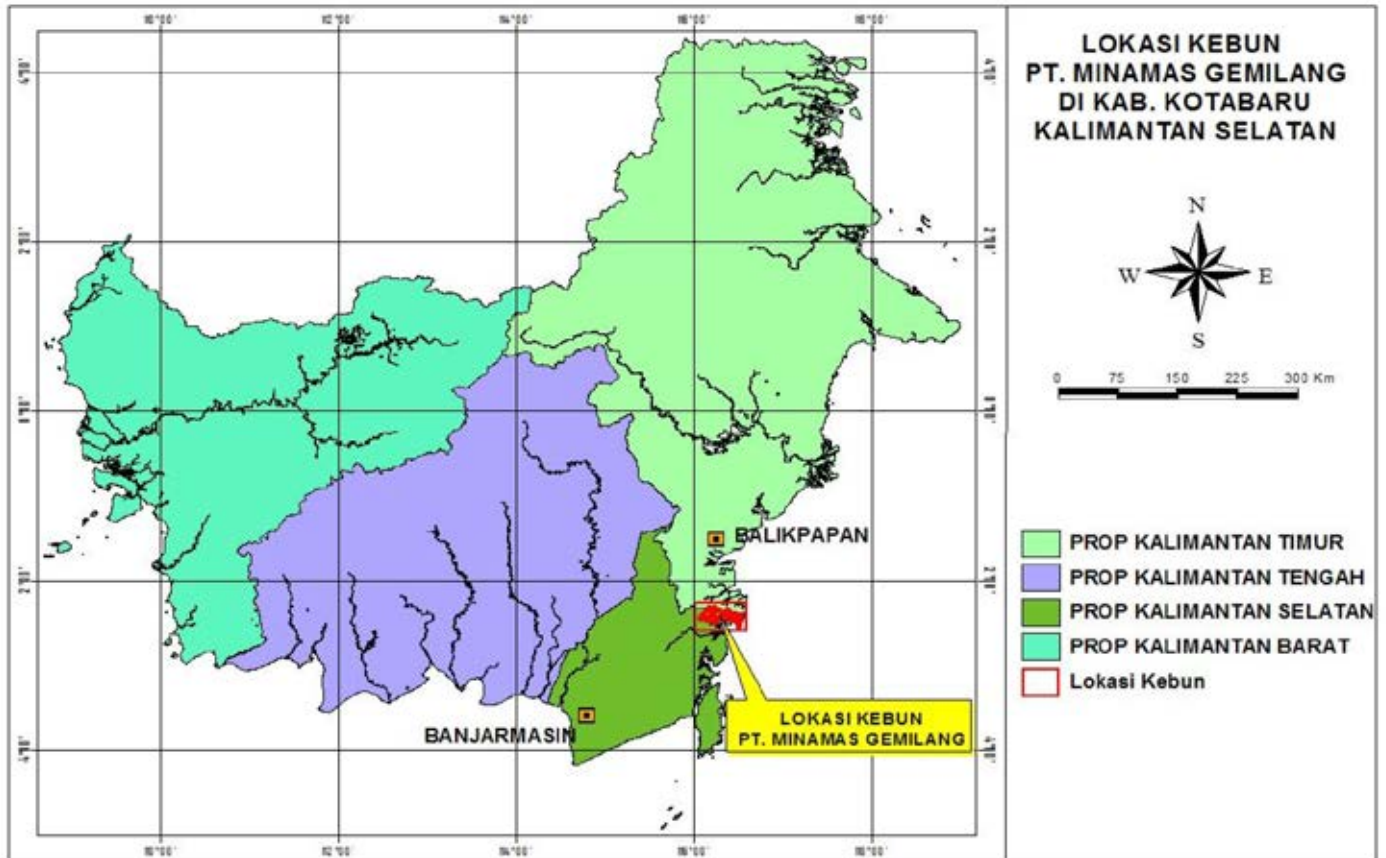
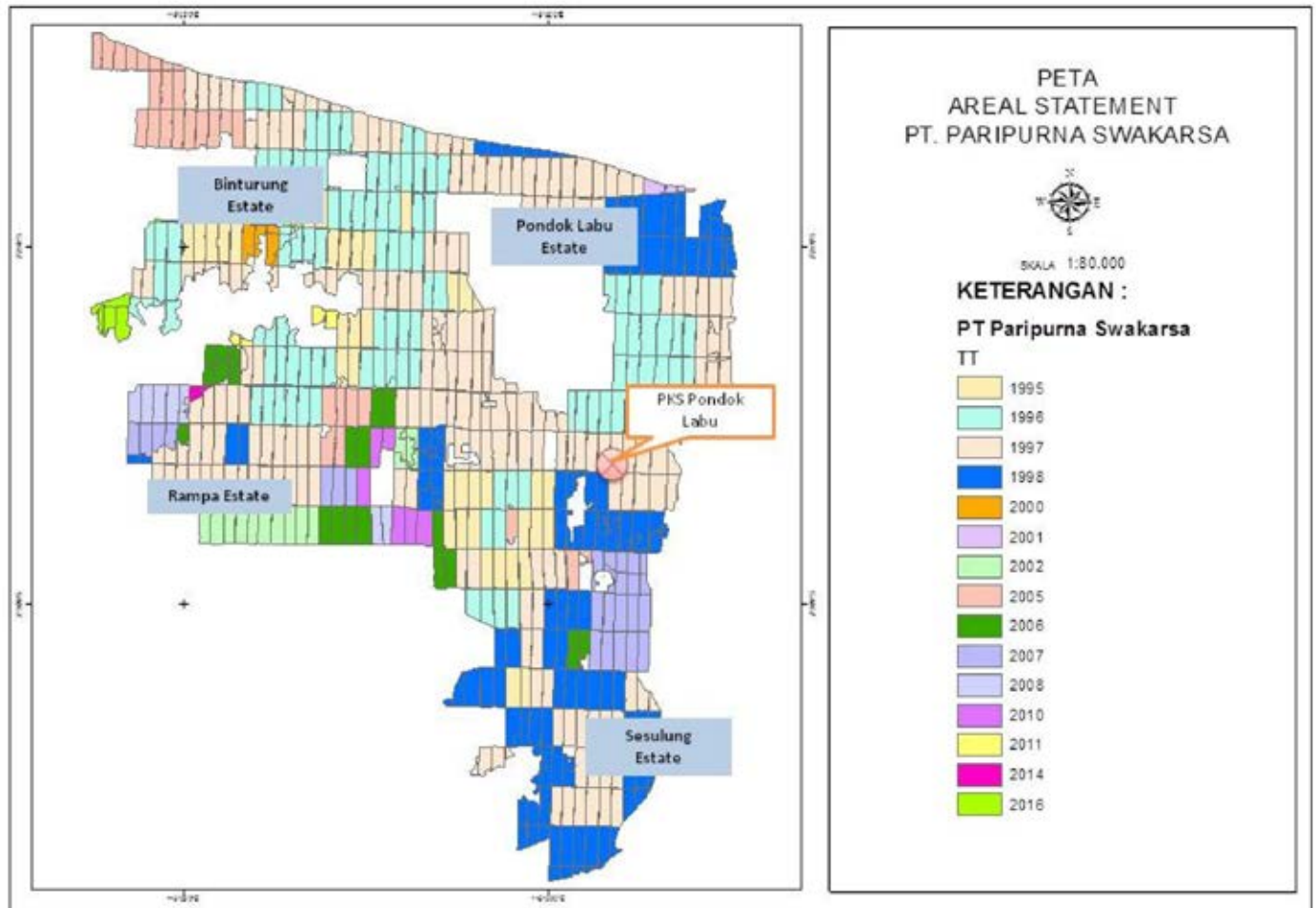


Figure 2. Operational Map of PT. Paripurna Swakarsa



Glossary

ASA	: Annual Surveillance Assessment	PK	: Palm Kernel
Babinkamtibmas	: <i>Badan Bintara Keamanan dan Ketertiban Masyarakat</i>	PKB	: <i>Perjanjian Kerja Bersama</i> (Collective labor agreement)
BNE	: Binturung Estate	PLE	: Pondok Labu Estate
BOD	: Biological Oxygen Demand	PLF	: Pondok Labu Factory
BPJS	: <i>Badan Penyelenggara Jaminan Sosial</i> (Social Assurance of Labor)	POM	: Palm Oil Mill
BPN	: <i>Badan Pertanahan Nasional</i> (National Land Agency)	POME	: Palm Oil Mill Effluent
BSS	: Block Spraying System	PPE	: Personal Protective Equipment
CB	: Certification Body	PSA	: Paripurna Swakarsa
CH	: Certificate Holder	PSD	: Plantation Services Departement
COD	: Chemical Oxygen Demand	PSQM	: Plantation Sustainability and Quality Management
CPO	: Crude palm oil	RKL	: <i>Rencana Pengelolaan Lingkungan</i> (Environment Management Plan)
CSR	: Corporate Social Responsibility	RPE	: Rampa Estate
EFB	: Empty Fruit Bunch	RPL	: <i>Rencana Pemantauan Lingkungan</i> (Environment Monitoring Plan)
EHS	: Environmental Health and Safety	RSPO	: Roundtable Sustainable Palm Oil
FFB	: Fresh Fruit Bunch	SCCS	: Supply Chain Certification Standard
GHG	: Green House Gas	SDP	: Sime Darby Plantation
HCV	: High Conservation Value	SIA	: Social Impact Assessment
HGU	: <i>Hak Guna Usaha</i> (Land Title)	SOP	: Standard Operational Procedure
HIRAC	: Hazard identification Risk Assessment Risk and Control	SOU	: Strategic Operation Unit
HRM	: Human Resource Management	SSE	: Sesulung Estate
IP	: Identity Preserved	WHO	: World Health Organization
IPM	: Integrated Pest Management	WTP	: Water Treatment Plant
LCC	: Legume Cover Crop	WWTP	: Waste Water Treatment Plant
LMI	: Laguna Mandiri		
LMR	: Langgeng Muara Makmur		
LTA	: Lost Time Accident		
LUCA	: Land Use Change Analysis		
MRC	: Minamas Research Center		
MSDS	: Material Safety Data Sheet		
NGO	: Non Government Organization		
OHS	: Occupational Health and Safety		
P2K3	: <i>Panitia Pembina Keselamatan dan Kesehatan Kerja</i>		
PIC	: Person In Charge		
PK	: Palm Kernel		

1.0 SCOPE OF THE CERTIFICATION ASSESSMENT			
1.1 Assessment Standard Used			
	<ul style="list-style-type: none"> • Indonesian National Interpretation Principle and Criteria RSPO 2013 for Indonesia July 2016, approved RSPO Governors 30 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	Organization name listed in the certificate	PT PARIPURNA SWAKARSA subsidiary of Sime Darby Plantation Bhd	
1.2.2	Contact person	Alegandran Maniam	
1.2.3	Organisation address and site address	RSPO Registered Company : No 2, Plantation Tower Jalan PJU 1A/7 Petaling Jaya, Malaysia 47301 Liaison Office : The Plaza Office Tower, 36 th Floor. Jl. MH Thamrin kav. 28 – 30, Jakarta – 10350	
1.2.4	Telephone	+6221 - 29926000	
1.2.5	Fax	+6221 – 29922686	
1.2.6	E-mail	alagendran.maniam@sime-darbyplantation.com	
1.2.7	Web page address	www.sime-darbyplantation.com	
1.2.8	Management Representative who completed the application for certification	Alegandran Maniam (Head of PSQM Sime-darby Plantation Bhd)	
1.2.9	Registered as RSPO member	1-0008-04-000-00 – 7 September 2004	
1.3 Type of Assessment			
1.3.1	Scope of Assessment and Number of Management Unit	One (1) palm oil mill and four (4) oil palm estate. Pondok Labu Mill, Binturung Estate, Sesulung Estate, Pondok Labu Estate and Rampa Estate	
1.3.2	Type of certificate	Single	
1.4 Locations of Mill and Plantation			
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			Latitude Longitude
	Pondok Labu	Village of Pondok Labu, Subdistrict of South Pamukan, District of Kotabaru, Province of Kalimantan Selatan, Indonesia	S 02° 27' 33" E 116° 31'08"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			Latitude Longitude

Binturung Estate	Village of Binturung, Subdistrict of Pamukan Utara, District of Kotabaru, Province of Kalimantan Selatan, Indonesia	S 02° 26' 17"	E 116° 26' 32"
Pondok Labu Estate	Village of Pondok Labu, Subdistrict of Pamukan Selatan, District of Kotabaru, Province Kalimantan Selatan, Indonesia	S 02° 24' 45"	E 116° 30' 36"
Rampa Estate	Village of Rampa Cengal, Subdistrict of Pamukan Selatan, District of Kotabaru, Province of Kalimantan Selatan, Indonesia	S 02° 27' 09"	E 116° 26' 11"
Sesulung Estate	Village of Sesulung, Subdistrict of Pamukan Selatan, District of Kotabaru, Province of Kalimantan Selatan, Indonesia	S 02° 29' 40"	E 116° 30' 38"

1.5 Description of Area Statement

1.5.1	Tenure	
	• State	15,876.20* Ha
	*HGU 1997 is 14,892 Ha HGU 2018 is 984.20 Ha	
	• Community	- Ha
1.5.2	Area Statement	
	• Total area	15,876.20 Ha
	• Mature area	12,599.00 Ha
	• Immature area	2,050.93 Ha
	• Nursery	38.00 Ha
	• Mill	55.23 Ha
	• Infrastructure	640.63 Ha
	• HCV	396.51 Ha
	• Water Catchment Area	3.83 Ha
	• Uplanted Area (Hill, river, valley)	23.16 Ha
	• Occupation	68.91 Ha

1.6 Planting Year and Cycles

1.6.1	Age profile of planting year					
	Planting Year	Hectares (Ha)				
		Binturung Estate	Pondok Labu Estate	Rampa Estate	Sesulung Estae	Total
	1995	292.38	63.73	-	61.32	417.43
	1996	1,148.81	985.09	161.02	71.86	2,366.78
	1997	765.84	1,546.85	1,319.41	1,201.06	4,833.16
	1998	74.88	671.36	251.76	1,436.03	2,434.03
	2001	-	27.70	-	-	27.70
	2002	-	-	419.65	-	419.65
2005	465.62	-	170.08	62.93	698.63	

	2006	44.81	-	244.43	131.01	420.25	
	2007	-	-	153.37	411.09	564.46	
	2008	-	-	193.64	-	193.64	
	2010	-	-	177.27	-	177.27	
	2011	46.00	-	-	-	46.00	
	Mature Area	2,838.34	3,294.73	3,090.63	3,375.30	12,599.00	
	2015	-	-	15.66	-	15.66	
	2016	333.44	-	-	216.39	549.83	
	2017	241.40	193.26	-	421.25	855.91	
	2018	167.97	-	213.14	248.42	629.53	
	Immature Area	742.81	193.26	228.80	886.06	2,050.93	
	TOTAL	3,581.15	3,487.99	3,319.43	4,261.36	14,649.93	
1.6.2	New Planting area after January 2010		- Ha				
1.6.3	Planting Cycle		2 nd Cycle				
1.7 Description of Mill and Supply Base							
1.7.1	Description of Mill						
	Name of Mill	Capacity (tons/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel	
				Out put (tons)	Extraction (%)	Out put (tons)	Extraction (%)
	Pondok Labu POM	60	230,899.22	45,260.77	19.60	11,046.30	4.78
	<i>*Production data source from 12 months before assessment (February 2018 – January 2019)</i>						
1.7.2	Description of Certification Scope of Supply Base						
	Name of Estate	Total Area (Ha)	Planted Area (Ha)	FFB (tons/year)	Yield (tons/ha/ year)	Supplied to Mill	
						FFB (tons/year)	%
	Binturung Estate	4,072.02	3,581.15	51,721.29	14	51,721.29	100
	Pondok Labu Estate	3,569.52	3,487.99	53,890.30	15	53,890.30	100
	Rampa Estate	3,656.21	3,319.43	61,780.52	19	61,780.52	100
	Sesulung Estate	4,578.45	4,261.36	55,133.34	13	55,133.34	100
	TOTAL	15,876.20	14,649.93	222,525.45	15	222,525.45	100
	<i>*Production data source from 12 months before assessment (February 2018 – January 2019)</i>						
1.7.3	FFB description from other source						
	Name of sources/Organiz ation (RSPO certified / non-certified)	Type of Organization	Number of smallholders	Production Area (Ha)	Supplied to Mill		
					FFB (tons/year)		
	Scheme smallholder of PT LMR	Certified associate smallholders	791	1,160.65	8,458.09		
	TOTAL					8,458.09	
	<i>*Source Production Data on 12 months before assessment (February 2018 – January 2019)</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 (tons/year)		Last year actual certified product (tons/year)			
	• FFB Processed			208,636		222,525.45			
	• CPO Production			48,900		45,260.77			
	• Palm Kernel (PK) Production			12,000		11,046.30			
1.8.2	Product selling								
	Tonnage of selling product			Period of actual selling product for last year (MT)					
	• CSPO sold as RSPO certified product			45,016.48 MT					
	• CSPK sold as RSPO certified product			10,517.59 MT					
	• CSPO sold under other scheme			-					
	• CSPK sold under other scheme			-					
	• CSPO sold as conventional			-					
	• CSPK sold as conventional			-					
1.8.3	Estimate of Certified FFB Claim								
	Name of Estates		Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/ year)		Yield (tonnes/ha/year)		
	Binturung Estate		4,072.02	3,581.15	51,721		14		
	Pondok Labu Estate		3,569.52	3,487.99	56,585		16		
	Rampa Estate		3,656.21	3,319.43	61,781		19		
	Sesulung Estate		4,578.45	4,261.36	55,133		13		
	TOTAL		15,876.20	14,649.93	225,220		15		
	*Projected FFB production for 12 months of license								
1.8.4	Estimate of Certified Palm Product Claim								
	Name of Mill		Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel		Supply Chain Module
					Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)	
	Pondok Labu POM		60	225,220	47,296	21	11,261	5	IP
	*Projected CSPO and CSPK production for 12 months of license								
1.9 Other Certifications									
	Certified ISPO by PT Mutuagung Lestari (MUTU-ISPO/007) issued 20 September 2013								
1.10 Time Bound Plan									
1.10.1	Time Bound Plan for Other Management Units								
	Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status			
	Mill	Time bound							
	INDONESIA								

1	Sekunyir. PT. Indotruba Tengah	2010	Sekunyir	2010	Seruyan and West Kotawaringin District – Central Kalimantan	Certified
			Seruyan	2010		Certified
2	Manggala. PT. Tunggal Mitra Plantations	2010	Manggala 1	2010	Rokan Hilir District – Riau	Certified
			Manggala 2	2010		Certified
			Manggala 3	2010		Certified
3	Bukit Ajong PT. Sime Indo Agro	2010	West	2010	Sanggau District – West Kalimantan	Certified
			West (HGU on process)	2019		-
			East	2010		Certified
			East (HGU on process)	2019		-
			East Plasma	2010		Certified
			West Plasma	2010		Certified
			Sei Mawang	2019		-
4	Teluk Siak. PT. Aneka Inti Persada	2011	Teluk Siak	2011	Siak District – Riau	Certified
			Pinang Sebatang	2011		Certified
			Aneka Persada	2011		Certified
5	Sungai Pinang. PT. Bina Sains Cemerlang	2012	Sungai Pinang	2012	Musi Rawas District – South Sumatera	Certified
			Sungai Pinang (HGU on process)	2020		-
			Bukit Pinang	2012		Certified
			Bukit Pinang (HGU on process)	2020		-
6	Pematang. PT. Teguh Sempurna	2011	Pematang	2011	Seruyan and East Kotawaringin Distri ct – Central Kalimantan	Certified
			Kawan Batu	2011		Certified
			Hatan Tiring	2011		Certified
			Batang Garing	2011		Certified
7	Alur Dumai. PT Lahan Tani Sakti	2011	Alur Dumai	2011	Rokan Hilir District – Riau	Certified
8	Teluk Bakau. PT. Bhumireksa Nusa Sejati	2011	Teluk Bakau	2011	Indra Giri Hilir District – Riau	Certified
			Nusa Perkasa	2011		Certified
			Nusa Lestari	2011		Certified
9	Mandah PT. Bhumireksa Nusa Sejati	2014	Mandah	2011	Indra Giri Hilir District – Riau	Certified
			Rotan Semelur	2011		Certified
10	Angsana. PT Ladangrumpun Suburabadi	2011	Angsana	2011	Tanah Bumbu District – South Kalimantan	Certified
			Gunung Sari	2011		Certified
			Pantai Bonati	2011		Certified
			KKPA-1 PT.SHE	2013		Certified
			KKPA-4 PT.SHE	2013		Certified
11	Mustika.	2013	Mustika	2013	Tanah	Certified

	PT Sajang Heulang		KKPA-2 PT.SHE	2013	Bumbu District – South Kalimantan	Certified
			KKPA-3 PT.SHE	2013		Certified
			KKPA-5 PT.SHE	2013		Certified
			SAP 1	2020		-
12	Gunung Aru. PT Bersama Sejahtera Sakti	2011	Gunung Aru	2011	Kotabaru District – South Kalimantan	Certified
			Gunung Kemas	2011		Certified
			Laut Timur	2011		Certified
			Pantai Timur	2011		Certified
			KKPA BSS	2020		-
13	Bebunga. PT. Langgeng Muaramakmur	2011	Bebunga	2011	Kotabaru District – South Kalimantan	Certified
			Bakau	2011		Certified
			Sungai Cengal	2011		Certified
14	Sukamandang PT Kridatama Lancar	2011	Sukamandang	2011	Seruyan and East Kotawaringin District – Central Kalimantan	Certified
			Sapiri	2011		Certified
			Barasdanum	2011		Certified
			Kuala Kuayan	2011		Certified
15	Pondok Labu. PT Paripurna Swakarsa	2012	Binturung	2012	Kotabaru District – South Kalimantan	Certified
			Pondok Labu	2012		Certified
			Rampa	2012		Certified
			Sesulung	2012		Certified
16	Rantau. PT Laguna Mandiri	2012	Rantau	2012	Kotabaru District – South Kalimantan	Certified
			Matalok	2012		Certified
			KKPA Sungai Cengal (1,382 SH)	2014		Certified
			Selabak (PT SAA)	2012		Certified
			Randi (PT SAA)	2012		Certified
			Sangkoh (PT SAA)	2012		Certified
			Lanting (PT LMR)	2012		Certified
17	Betung. PT Laguna Mandiri	2014	Betung	2012	Kotabaru District – South Kalimantan	Certified
			Sekayu	2012		Certified
18	Ungkaya. PT Tamaco Graha Krida	2012	Ungkaya	2012	Morowali District – Sulawesi Tengah	Certified
			Plasma TGK	2020		-
19	Ladang Panjang. PT Bahari Gembira Ria	2012	Ladang Panjang	2012	Muaro Jambi District - Jambi	Certified
			Ladang Panjang (HGU on process)	2020		-
			Plasma BGR	2020		-
20	Rantau Panjang. PT Guthrie Pecconina Indonesia	2012	Rantau Panjang	2012	Musi Banyuasin District – South Sumatera	Certified
			Rantau Panjang (HGU on process)	2020		-
			Bumi Ayu	2012		Certified

			Karang Ringin	2012		Certified
			Napal	2012		Certified
			Napal (HGU on process)	2020		-
			Mangun Jaya	2012		Certified
			Mangun Jaya (HGU on process)	2020		-
			Sungai Jernih	2020		-
			GPI KKPA	2020		-
21	Blang Simpo. PT Perkasa Subur Sakti	2013	Tamiang (PT PPP)	2013	Aceh Tamiang and East Aceh District – Aceh	Certified
			Batang Ara (PT PSK)	2013		Certified
			Blang Simpo-01	2013		Certified
			Blang Simpo-02	2013		Certified
22	MAS. PT Mitra Austral Sejahtera	2020	MAS 1	2019	Sanggau District – West Kalimantan	-
			MAS 1	2019		-
			MAS 1	2019		-
			Plasma MAS	2020		-
23	Lembiru. PT Sandika Nata Palma	2014	Lembiru	2014	Ketapang District – West Kalimantan	Certified
			Awatan	2014		Certified
			Karya Palma	2019		-
			KKPA SNP	2020		-
			Pelanjau (PT BAL)	2019		IC
			Sungai Putih (PT BAL)	2019		-
			Baturus (PT BAL)	2019		-
			KKPA BAL	2020		-
	MALAYSIA					
1	Sg Dingin SOU 1	2010	Bukit Hijau	2010	Kerangan, Kedah	Certified
			Padang Buluh	2010		Certified
			Bukit Selangor	2010		Certified
			Sg Dingin	2010		Certified
			Jentayu	2010		Certified
			Anak Kuli	2010		Certified
			Somme	2010		Certified
2	Chersonese SOU 2	2011	Chersonese	2011	Kuala Kurau, Perak	Certified
			Holyrood	2011		Certified
			Kalumpong	2011		Certified
			Tali Ayer	2011		Certified
3	Elphil SOU 3	2011	Kinta Kellas	2011	Sg Siput, Perak	Certified
			Elphil	2011		Certified
			Kamuning	2011		Certified

4	Flemington SOU 4	2011	Flemington	2011	Teluk Intan, Perak	Certified
			Bagan Datoh	2011		Certified
			Sabak Bernam	2011		Certified
			Sg Samak	2011		Certified
5	Seri Intan SOU 5	2011	Seri Intan (Main Division)	2011	Teluk Intan, Perak	Certified
			Sabrang	2011		Certified
			Sg Wangi	2011		Certified
			Sogomana (Main Division)	2011		Certified
6	Selaba SOU 5	2011	Seri Intan (Selaba Division)	2011	Teluk Intan, Perak	Certified
			Sogomana (Cashwood & Sg Beruas Division)	2011		Certified
			Bikam	2011		Certified
			Clumy	2011		Certified
7	Tennamaram SOU 6	2011	Tennamaram	2011	Bestari Jaya, Selangor	Certified
			Sungei Buloh	2011		Certified
			Bkt Talang	2011		Certified
8	Bkt Kerayong SOU 7	2011	Bkt Kerayong	2011	Kapar, Selangor	Certified
			Bkt Cherakah	2011		Certified
			Bkt Rajah	2011		Certified
			Bkt Lagong	2011		Certified
			Elmina	2011		Certified
9	East SOU 8	2010	East	2010	Carey Island, Selangor	Certified
			Dusun Durian	2010		Certified
			Sepang	2010		Certified
10	West - SOU 9	2010	West	2010	Carey Island, Selangor	Certified
11	Bukit Putri - SOU 10	2011	Bukit Putri	2011	Raub, Pahang	Certified
12	Kerdau SOU 11	2011	Kerdau	2011	Temerloh, Pahang	Certified
			Jentar	2011		Certified
			Mentakab	2011		Certified
			Sg Mai	2011		Certified
			Chenor	2011		Certified
13	Jabor - SOU 12	2011	Jabor	2011	Kuantan, Pahang	Certified
14	Labu SOU 13	2011	Labu	2011	Nilai, Negeri Sembilan	Certified
			New Labu	2011		Certified
			Bradwall	2011		Certified
15	Tanah Merah SOU 14	2010	Tanah Merah	2010	Port Dickson, Negeri Sembilan	Certified
			Sua Betong	2010		Certified

			Bukit Pelandok	2010		Certified
16	Sua Betong SOU 15	2014	Salak	2014	Port Dickson, Negeri Sembilan	Certified
			Sengkang	2014		Certified
			Siliau	2014		Certified
			PD Lukut	2014		Certified
			Sungai Baru	2014		Certified
			Tampin Linggi	2014		Certified
17	Kok Foh SOU 16	2011	Bukit Pilah	2011	Bahau, Negeri Sembilan	Certified
			Kok Foh	2011		Certified
			Muar River	2011		Certified
			St. Helier	2011		Certified
			Pertang	2011		Certified
			Sg Gemas	2011		Certified
			Sg Sebalang	2011		Certified
			Sg Senarut	2011		Certified
18	Kempas SOU 17	2010	Kempas	2010	Jasin, Melaka	Certified
			Kemuning	2010		Certified
			Tangkah	2010		Certified
19	Diamond Jubilee SOU 18	2011	Bukit Asahan	2011	Jasin, Melaka	Certified
			Diamond Jubilee	2011		Certified
			Serkam	2011		Certified
20	Pagoh SOU 19	2014	Pagoh	2014	Muar, Johor	Certified
			Lanadron	2014		Certified
			Pengkalan Bukit	2014		Certified
			Welch	2014		Certified
21	Chaah SOU 20	2010	North Labis	2010	Chaah, Johor	Certified
			Cha'ah	2010		Certified
			Sg Simpang Kiri	2010		Certified
22	Gunung Mas SOU 21	2010	Gunung Mas	2010	Kluang, Johor	Certified
			Kempas Klebang	2010		Certified
			Bukit Paloh	2010		Certified
			Yong Peng	2010		Certified
23	Bukit Benut SOU 22	2011	Bukit Benut	2011	Kluang, Johor	Certified
			CEP Niyor	2011		Certified
			Lambak / Elaeis	2011		Certified
24	Ulu Remis SOU 23	2011	Pekan	2011	Layang-layang, Johor	Certified
			Sembrong	2011		Certified

			Tun Dr. Ismail	2011		Certified
			Ulu Remis	2011		Certified
			Bukit Badak	2011		Certified
			Cenas	2011		Certified
25	Hadapan SOU 24	2011	CEP Rengam	2011	Layang-layang, Johor	Certified
			Kulai	2011		Certified
			Layang	2011		Certified
			Seri Pulai	2011		Certified
26	Sandakan Bay SOU 26	2008	Tun Tan Siew Sin	2008	Sandakan, Sabah	Certified
			Tunku	2008		Certified
			Tigowis	2008		Certified
			Sentosa	2008		Certified
			Saguliud	2008		Certified
27	Melalap SOU 27	2011	Melalap	2011	Tenom, Sabah	Certified
			Sapong	2011		Certified
28	Binuang SOU 28	2009	Tingkeyu	2009	Kunak, Sabah	Certified
			Sungang	2009		Certified
			Jelata Bumi	2009		Certified
			Binuang	2009		Certified
29	Giram SOU 29	2009	Mostyn	2009	Kunak, Sabah	Certified
			Giram	2009		Certified
30	Merotai SOU 30	2009	Imam	2009	Tawau, Sabah	Certified
			Merotai	2009		Certified
			Table	2009		Certified
			Tiger	2009		Certified
31	Lavang SOU 31	2011	Belian	2011	Bintulu, Serawak	Certified
			Kelida	2011		Certified
			Lavang	2011		Certified
			Lavang (SE)	2011		Certified
			Rasan	2011		Certified
			Chartquest	2011		Certified
			Dulang	2011		Certified
			Peroh	2011		Certified
			Pekaka	2011		Certified
			Ruai	2011		Certified
32	Rajawali SOU 32	2011	Rajawali	2011	Bintulu, Serawak	Certified
			Samudera	2011		Certified
			Semarak	2011		Certified

			Bayu	2011		Certified
33	Derawan SOU 33	2011	Takau	2011	Bintulu, Serawak	Certified
			Damai	2011		Certified
			Derawan	2011		Certified
			Sahua	2011		Certified
	LIBERIA					
1	Grand Cape Mount	2018	Matambo	2018	Grand Cape Mount, Liberia	IC
			Grand Cape Mount	2018		IC
			Zodua	2018		IC
			Bomi	2018	Bomi, Liberia	IC
			Lofa	2018		IC
	P & G (New Britain Palm Oil)					
1	Poliamba	2012	Kara	2012	Keviang, New Ireland Province, P&G	Certified
			West Coast	2012		Certified
			Nalik	2012		Certified
			Noatsi	2012		Certified
			Madak	2012		Certified
			North (Smallholders)	2012		Certified
			South (Smallholders)	2012		Certified
			West (Smallholders)	2012		Certified
2	Tetere	2011	Tetere	2011	Gudaicanal, Slomon Island	Certified
			Ngalimbiu	2011		Certified
			Mbalisuna	2011		Certified
			West Zone (Smallholders)	2011		Certified
			Central Zone (Smallholders)	2011		Certified
			MBA East (Smallholders)	2011		Certified
			MBA West (Smallholders)	2011		Certified
			3	Sangara, Sambiripa & Mamba		2013
Sumberipa	2013	Certified				
Ambogo	2013	Certified				
Embi	2013	Certified				
Mamba	2013	Certified				
Sorovi (smallholders)	2013	Certified				
Igora (smallholders)	2013	Certified				
	Saiho (smallholders)	2013			Certified	
	Aeka (smallholders)	2013		Certified		

			Ilimo (smallholders)	2013		Certified
4	Gusap	2010	Dumpu	2010	Madang, P&G	Certified
			Surinam	2010		Certified
			Jephcott	2010		Certified
			Gusap	2010		Certified
			Paddox	2010		Certified
			Ngaru	2010		Certified
			Madang VOP (smallholders)	2010		Certified
			Morobe VOP (smallholders)	2010		Certified
5	Hagita	2013	Giligili	2013	Milne Bay, P&G	Certified
			Hagita	2013		Certified
			Waigani	2013		Certified
			Sagarai	2013		Certified
			Padipadi	2013		Certified
			Mariawatte	2013		Certified
			East Gurney	2013		Certified
			West Gurney	2013		Certified
			East Sagarai	2013		Certified
			West Sagarai	2013		Certified
6	Mosa Kumbango Kapiura Namumdo Waraston	2008	Bebere	2008	West New Britain	Certified
			Kumbango	2008		Certified
			Togulo	2008		Certified
			Dami	2008		Certified
			Waisisi	2008		Certified
			Kautu	2008		Certified
			Karausuu	2008		Certified
			Moroa	2008		Certified
			Bilomi	2008		Certified
			Loata	2008		Certified
			Haella	2008		Certified
			Garu	2008		Certified
			Daliavu	2008		Certified
			Sapuri	2008		Certified
			Malilimi	2008		Certified
			Rigula	2008		Certified
			Nomundo	2008		Certified
			Navarai / Karato ME	2008		Certified

		Volupai . Lotomgam / Natupi / Goruru	2008	Certified
		Lolokoru	2008	Certified
		Silovoti	2008	Certified
		LSS Hoskin (1,877 Smallholders)	2008	Certified
		VOP East (1,815 Smallholders)	2008	Certified
		VOP Central (1,958 Smallholders)	2008	Certified
		VOP West (1,277 Smallholders)Kaulong / Akamie / Pusiki / Repamira / Sakapei / KDC ME (21 large smallholders)	2008	Certified
		LSS Kapiura (847 Smallholders)	2008	Certified
		VOP Kapiura (551 Smallholders)	2008	Certified
	<p>Sime Darby has achieved 34 management units in Malaysia, 25 management units in Indonesia, 10 management units in P&G that RSPO certified. Total management unit in Sime Darby Plantation Bhd are 34 in Malaysia, 25 in Indonesia and 10 in P&G. In the year of 2016 & 2017 there are three Mill that are no longer operating, and for the supplying base (Estate) is diverted to a mill that is still operating and has been certified RSPO. The mills are:</p> <ol style="list-style-type: none"> 1. Angsana Mini Mill, PT Sajang Heulang: Mill stop operate since 2016 and the supply bases is transfer to Angsana POM, PT Ladangrumpun Subur Abadi. 2. Selabak Mill, PT Swadaya Andhika: Mill stop operate since 2017 and the supply bases is transfer to Rantau POM, PT Laguna Mandiri 3. Pekaka, SOU 34: Mill stop operate since 2017 and the supply bases is transfer to Lavang, SOU 31 <p>A new mill will be set up in Liberia and planned for commissioning in February 2016. Preparation to undergo the RSPO Certification process is in progress and Sime Darby Plantation Bhd targets to undergo RSPO Certification by end 2017. RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed on 2018.</p> <p>There was change of the Time Bound Plan under Sime Darby on April 2019 cause the Sime Darby postpone the others certification process. Change of the Time Bound Plan explanation: PT Mitra Austral Sejahtera. There are social issue still unresolved from the <i>Serikat Petani Kelapa Sawit</i> (SPKS) Sanggau, however the improvement are in progress. Sime Darby has informed the Time Bound Plan progress, MUTU has consider that Sime Darby still comply with the RSPO requirement for partial certification.</p>			
1.10.2	Progress of Associated Smallholders and Outrowers for Certifiable Standard			
	<p>There is no smallholder's scheme under PT PSA. The part area of associated smallholder (KKPA Sungai Cengal under PT LMR) which supplied to Pondok Labu POM has been certified under PT LMR.</p>			

2.0 ASSESSMENT PROCESS	
2.1 Assessment Team	
ASA 1.1	<ol style="list-style-type: none"> 1. Sandra Purba (Lead Auditor). Graduated from Forestry Faculty Bachelor Degree, majored in Forest Product Technology. Have experience working in industrial forest company, mining and oil palm plantations company for 6 (six) years as EHS and Sustainability Assistant. Has been certified as General OHS Expert, attend and passed the several trainings of management system (OHS, environment and quality management), has been attend the training of waste management, GHG verification and validator training, and conflict resolution and mapping training. Have been successfully passed the Indonesian Sustainable Palm Oil (ISPO) Lead Auditor training course, RSPO lead auditor training course and auditor of RSPO Next. Involve in many audit activities of similar scheme (ISPO) since April 2013 covering the Legal Aspect, Environmental aspect, Social Aspect, Health and Safety Aspect, conservation and Worker Welfare. During this audit, she assigned to verify legal aspect land dispute, HCV and SCCS. 2. Rizliani Aprianita Hsb. Indonesian Citizen. Bachelor and Magister of Agribusiness, Faculty of Agriculture. She had followed training such as RSPO Lead Auditor Training, SCCS training, SA 8000 training, lead Auditor ISO 9001:2008, ISO 14001:2004, ISPO Auditor training and followed several IHT related to environment, BMP etc. She has been involved in several audit activities related to sustainable palm oil certification since 2015 covering social aspect, health and safety aspect, worker welfare and waste management aspect. During this assessment, she assigned to verify of social aspect and worker welfare. 3. Afiffuddin. Indonesian citizen, Diploma III majoring Palm Oil Plantation, Bogor Agricultural University. Five years working experience since 2010 at Oil Palm Plantation Company in Indonesia as agronomy operational staff and followed several trainings namely: Basic Plantation Management Program, Auditor Training Indonesian Sustainable Palm Oil (ISPO), Training of RSPO lead auditor, OHS General Expert, OHS System Management based on PP 50 2012 and Management System Certification (ISO 9001:2015/SNI 19011-9001:2015) ISO 17021, ISO 17065, SA 8000 training. He has been involved in several audit activities related to sustainable palm oil certification since 2016 covering Best Management Practices aspect, health and safety aspect and worker welfare aspect. During this audit, He conducted an assessment on BMP Agronomy and long term budget 4. Yudhi Yuniarto Tallutondok. Indonesian citizen, Bachelor of Fisheries, Padjadjaran University. Have experience of working over three years since 2013 as plantation operations staff in private palm oil plantation companies in Indonesia. Training have been followed including Auditor of Indonesian Sustainable Palm Oil (ISPO), Lead Auditor of Roundtable on Sustainable Palm Oil (RSPO) P&C, Lead Auditor of ISO 9001:2015, ISO 14001:2015, ISO 22000:2009, ISO 19011:2011, Social Accountability 8000, Basic Management Development Program Agronomy, Fire Anticipation on Land and Forest, Potential Mapping and Conflict Resolution in Production Forests, Awareness ISO 17021 and ISO 17065. Has participated in audit activities for the ISPO and RSPO scheme since 2017 for agronomy, OHS, labor, social and legality aspects. In this audit activity performs the assessment of Best Management Practices and OHS.
2.2 Assessment Methodology, Assessment Process and Locations of Assessment	
2.2.1	Figure of person days to implement assessment
ASA 1.2	Number of auditors : 4 auditor Number of days for ASA 1.2 at site : 4 days Number of working days for ASA 1.2 at site : 16 Working days
2.2.2	Assessment Process
ASA 1.2	The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT. Paripurna Swakarsa to the requirements of Indonesian National Interpretation of RSPO Principles and Criteria 2013 by INA-NITF, July 2016 (Endorsed by the RSPO Board of Governors meeting on 30th September 2016) and RSPO Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014, revised on 14 June 2017 (Module D for CPO Mill).

The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) *interview*, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site. Some opportunities for improvement of the results **ASA 1.2** delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase (**ASA-1.3**). Improvement of findings from main assesment findings were observed by auditors at this **ASA 1.2** assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of **ASA 1.2**.

The assessment program please find Appendix 2

2.2.3
Location of Assessment
ASA 1.2

Number of units in this certification activity is 4 estates, which supply the raw material (FFB) to Pondok Labu palm oil 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 1 palm oil mill (Pondok Labu Factory) and 4 estates (Pondok Labu estate, Binturung estate, Sesulung esta and Rampa estate))

Pondok Labu Estate

- **HGU poles no.: 54, 55, 12, 13, and 14.** Observation to legal boundary of PT PSA and verification related to indication of over-planted.
- **Riparian area of Pondok Labu River, block of A57.** Observation and verification related to management of HCV area.
- **Riparian area of Separe River, block of J53/54 Div 4.** Observation and verification related to management of HCV area.
- **Block D15 Division 2.** Field observation and interview with 3 harvest worker related to harvesting, worker welfare and OHS implementation
- **Block G35 Division 1.** Field observation and interview with 2 spraying related to herbicide spraying, worker welfare and OHS implementation.
- **Block G34 Division 1.** Field observation and interview related to IPM, worker welfare and OHS implementation.
- **Chemical storage.** Observation and interviews related to chemical and pesticide storage area, hazardous waste management, employment, and implementation OHS.
- **Material storage.** Observation related to PPE Stock.
- **Fire Fighter Warehouse.** To observe completeness and readiness of fire fighter equipment.
- **Fertilizer storage.** Observation and interviews related to waste management and implementation OHS.
- **Clinic.** Observation and interview with paramedic about first aid mechanism, medical waste management and work accident record monitoring.
- **Daycare.** Observation and interviews related to employee welfare facilities, wages, employment and domestic waste management.
- **Housing complex division II.** Observation of the availability of infrastructure such as employee housing facilities, water facilities, educational facilities, religious facilities, health facilities and sports facilities
- **Block Spraying System (BSS) House.** Observation and interview related conditions of chemical mixing area, PPE warehouse and PPE handling.

Sesulung Estate

- **Block L48 Division 1.** Observation of circle raking activities and interviews related to tasks and responsibilities (job description), work procedures, safe working practices, use of PPE, periodic health checks, remuneration system, Work Accident Insurance, provision of welfare facilities and infrastructure for workers.
- **Block R48 Division 3.** Observation spraying activities and interviews with workers spray related to the duties and responsibilities (job description), work procedures, a dose of agrochemical application, safe work practices, use of PPE, periodic medical examinations, P3K foreman, wage system, labor protection (Health Insurance and

	<p>employment), training in the use of pesticides is limited and transportation workers.</p> <ul style="list-style-type: none"> • HGU borderlines No. PSA32, PSA23, PSA24 and PSA25. Field observation related to boundaries maintenance activity. • Housing complex division 4. Observation and interview related to availability of infrastructure such as employee housing facilities, water facilities, educational facilities, religious facilities, health facilities and sports facilities • Chemical storage. Observation and interviews related to chemical and pesticide storage area, hazardous waste management, employment, and implementation OHS. • Fertilizer storage. Observation and interviews related to waste management and implementation OHS. • Fuel Storage. Observation related to implementation of OHS • Workshop. Observation and interviews related to the competence of workers, implementation OHS (including medical check up), employment, waste management and complaint mechanism. • Generator set room. Observation and interview related to environmental aspect, OHS implementation, worker training, and workers' knowledge about work procedure. • Block Spraying System (BSS) House. Observation and interview related conditions of chemical mixing area, PPE warehouse and PPE handling. <p>Pondok Labu Factory</p> <ul style="list-style-type: none"> • Security and WB station. Observation related to FFB receiving and CPO/PK delivery (SCCS implementation), interview to workers (security and operator) regarding to the employment aspect. • Laboratory. Observation related to OSH and environment aspect. • Grading station. Observation and interview with Foreman and FFB Grader towards technical work of FFB grading, administration, OHS and manpower aspects. • Sterilizer Station. Observation and interview with Operators towards technical work, OHS, emergency handling, special medical check-up and manpower aspects. • Press Station. Observation towards technical work and emergency handling. • Engine Room Station. Observation and interview with Operators towards technical work, OHS, emergency handling, electricity installation and maintenance, special medical check-up as well as manpower aspects. • Boiler Station. Observation and interview with Operators towards technical work, OHS, emergency handling, special medical check-up and manpower aspects. • Clarification Station. Observation and interview with Operators towards technical work, OHS, emergency handling, special medical check-up and manpower aspects. • Workshop. Observation and interviews related to the competence of workers, implementation OHS (including medical check up), employment, waste management and complaint mechanism. • Material storage. Observation related to PPE Stock. • Chemical storage. Observation and interviews related to chemical and pesticide storage area, hazardous waste management, employment, and implementation OHS. • Hazardous Waste Storage. Observation and interviews related to hazardous waste management, OHS implementation, employment and complaint mechanism. • Press Station. Observation and interview with Foreman and Operator towards technical work, OHS, emergency handling, special medical check-up and manpower aspects. • Nut and Kernel Station. Observation and interview with Foreman and Operators towards technical work, OHS, emergency handling, special medical check-up and manpower aspects. • Material and Oil Warehouse. Observation and interview related to environmental aspect, OHS implementation, medical check-up, and worker knowledge about work procedure • Water Treatment Plant. Observation the management of waste, handling chemical and monitoring of water usage. • Wastewater Treatment Plant (WWTP). Observation and interview related to environmental aspect. <p>Rampa Estate</p> <ul style="list-style-type: none"> • Block of L37 Div 3, circle weeding spraying. Observation related to OHS and environment aspect and interview related to employment aspect
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	<ul style="list-style-type: none"> • Block of L35 Div 3, IPM (Controlling of <i>Oryctes</i>). Observation related to OHS and environment aspect and interview related to employment aspect • HCV area, block of N27. Observation and verification related to management of HCV area. • Harvesting, Block L32/L33 Division 3. Field observation and interview related to harvesting, worker welfare, and OHS implementation. <p>Binturung Estate</p> <ul style="list-style-type: none"> • Riparian of Binturung River, block of F20 Div 4. Observation and verification related to management of HCV area. • HGU Poles BPN15, BPN60, BPN59, BPN5, BPN21, BPN20. Observation to legal boundary of PT PSA and verification related to indication of over-planted. • Block D28 Division 2. Observation of harvesting and interviews with harvesters and foreman associated with work such as the distribution harvesting plots, crop rotation, criteria and penalties harvest, the wage system tonnage, health insurance and labour protection, safe work practices and use of PPE. • Block H27 Division 3. Observation spraying activities and interviews with workers spray related to the duties and responsibilities (job description), work procedures, a dose of agrochemical application, safe work practices, use of PPE, periodic medical examinations, P3K foreman, wage system, labor protection (Health Insurance and employment), training in the use of pesticides is limited and transportation workers. • Block F22-23 Division 2. Field observation related to replanting activity with heavy equipment. • Block G25 Division 3. Observation of manual weeding activities and interviews related to tasks and responsibilities (job description), work procedures, safe working practices, use of PPE, periodic health checks, remuneration system, Work Accident Insurance, provision of welfare facilities and infrastructure for workers. • Block D30 Division 2. Observation the Barn Owl Box is in active conditions. • Generator set room. Observation and interview related to environmental aspect, OHS implementation, worker training, and workers' knowledge about work procedure. • Daycare. Observation and interviews related to employee welfare facilities, wages, employment and domestic waste management. • Housing complex division II. Observation of the availability of infrastructure such as employee housing facilities, water facilities, educational facilities, religious facilities, health facilities and sports facilities • Chemical storage. Observation and interviews related to chemical and pesticide storage area, hazardous waste management, employment, and implementation OHS. • Fertilizer storage. Observation and interviews related to waste management and implementation OHS. • Fuel Storage. Observation related to implementation of OHS • Material storage. Observation related to PPE Stock and material storage. • Hazardous Waste Storage. Observation and interviews related to hazardous waste management, OHS implementation, employment and complaint mechanism. • Reservoir. Observation related to water source for housing. <p>Stakeholder</p> <ol style="list-style-type: none"> 1. Surrounding communities (Pondok Labu Village). Interviews related to the issue of environmental pollution, fire issue, land conflict issue, the company's contribution to society and the impact of corporate activities. 2. Manpower Agency of Kotabaru Regency.
2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ASA 1.2	<p>Consultation of stakeholders for PT. Paripurna Swakarsa was held by:</p> <ul style="list-style-type: none"> • Public Notification on 28th January 2019 at PT Mutuagung Lestari Website (www.mutucertification.com) • Public consultation with government of Kotabaru Regency conducted by phone on 14th February 2019 • Public consultation meeting with local stakeholder conducted by interview on 14th February 2019

	<ul style="list-style-type: none"> Public consultation meeting with internal stakeholder on 14th February 2019 Public consultation with NGO by email conducted on 06th February 2019
2.3.2	Stakeholder contacted
	<i>Please find appendix 1</i>
2.4	Determining Next Assessment
	The next visit (ASA-1.3) will be determined one year after this ASA 1.2

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Pondok Labu Factory – PT Paripurna Swakarsa, Sime Darby Plantation Berhad operation consisting of one (1) mill and four (4) oil palm estates.

During the assessment, there were ten (10) Nonconformities were assigned against Major Compliance Indicators; six (6) nonconformities were assigned against Minor Compliance Indicators; and eight (8) opportunities for improvement were identified.

Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5. The company has already prepared and implemented the corrective actions that had been reviewed and accepted by Auditors in form of documentation evidences e.g. (document record/photographic). Those corrective actions taken that consist of six (6) Major non-conformities and six (6) Minor non-conformities had been closed out shall be verified during next assessment.

MUTUAGUNG LESTARI found that Pondok Labu Factory – PT Paripurna Swakarsa, Sime Darby Plantation Bhd complied with the requirements of Indonesian National Interpretation of RSPO Principles and Criteria 2013 by INA-NITF, July 2016 (Endorsed by the RSPO Board of Governors meeting on 30th September 2016) and RSPO Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014, revised on 14 June 2017 (Module D for CPO Mill).

Therefore MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is continued.

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
PRINCIPLE #1 COMMITMENT TO TRANSPARENCY		
1.1	Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	
1.1.1	<p>The Company had list of stakeholders such as employees, Government Regency, Local Communities, Labor union etc. The latest update stakeholders is December 2018. Information (periodic reports) submitted to the Government Regency related to environment such as mill effluent report, hazardous waste reports, employment reports, health, safety and accident report etc. The PIC in site is operation manager, in coordination with other department head. According to interviews with government agencies, local communities and local contractors, they has been know type and how to obtain information from the company.</p> <p>Nonconformities No. 2019.01</p> <ul style="list-style-type: none"> - Based on the results of the document verification it is known that the company has sent the 2nd semester RKL-RPL Implementation Report 2018 through the delivery of JNE to the Environmental Agency of Kotabaru Regency and the Environmental Agency of South Kalimantan Province on 11 February 2019. During the ASA 1.2 audit, the company revised the RKL-RPL Implementation Report for semester 2 of 2018. However, the document has not been submitted to the relevant Office, so this becomes NCR 2019.01. - Results of interviews with contract workers in the block G34 Div 1 PLE (pest control), it was conveyed that workers had not received a copy of the agreement. This is not in accordance with Law No. 13 of 2003 article 54 which states that work agreements are made in at least 2 copies which have the same legal force and workers and employers each get 1 work agreement. 	

1.1.2

There is a procedure for information and transparency (SOP No.012/PSA-INF/10 dated 20 February 2016) which explain the mechanism of communication and handling of complaint. Any requests for information from stakeholders are recorded on the logbooks of information request stored at Estate Office. The information request has been responded in accordance mechanisms established by the Company. It's declared either when interviews with government agencies, local communities and local contractors. The officer who responsible for handling request information is Human Resources Administrative Assistant. Records of requests and responses of stakeholder information is stored at Estate Office.

Based on interviews with government agencies, local communities, local contractors and internal stakeholder known that the company has responded to every information request as long as each request is submitted in accordance with the procedure and the requested type of information is publicly available information.

1.1.1	Status: Non-Conformity No.2019.01 with minor category
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1.2 Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.
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1.2.1

The company has a procedure for requesting information with document number 102 / PSA-INF / C10. The procedure describes the types of document information that can or cannot be accessed generally, for example documents that can be accessed are UKL / UPL documents, SIA documents, CSR documents and GHG documents, etc. Procedures have been disseminated to relevant stakeholders and documents are stored in the Department of Sustainability and Certification and Plantation Plants.

Based on interviews with the Pondok Labu Community and the Labor Agency, it is known that the company has carried out socialization related procedures for requesting information and has determined the person responsible for responding to information requests. Each party also knows the types of general information that can be accessed. Further explained that public documents that can be accessed are specific documents from each operational unit, while the general documents available on the website are information for the Minamas Plantation Indonesia Group in general.

	Status: Comply
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1.3 Growers and millers commit to ethical conduct in all business operations and transactions.

The company has a policy related to Code of Conduct numbering 440 / HRM-COC / 07 No Revisi.00 dated May 24, 2007. In general, the Code of Conduct explains that Minamas Plantations as a subsidiary is instructed to conduct business activities based on the principles of Good Governance. The entire operational environment of Minamas Plantations. Through this Code of Conduct, it is hoped that ethical behavior will be formed from all individual companies in their attitude and activities both within the company and outside the Minamas Plantations environment.

The company has also socialized information to employees on a regular basis such as socialization at Sesulung Estate on January 7, 2019 which was attended by 36 employees, socialization at Binturung Estate on November 13, 2018 which was attended by 15 employees, socialization at Pondok Labu Estate on the 10th November 2018 which was attended by 32 employees and socialization at the Rampa Estate on November 10, 2018 which was attended by 21 employees

Interviews with workers in Estate and Factory known that they know about the company policy to respect human rights and commitment to ethical behavior in all working operations. In addition, interview with contractor known that the policy has had socialized while contract is made.

	Status: Comply
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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 company has fulfilled all requirements according to applicable regulations, for example :

Legal

On the legal aspect, the company has comply to Permentan No.: 98/2013 and UU No 39 / 2014, shown by having plantation business permit namely decree of Kotabaru Regent No. 188/45/388/KUM/2009 dated 15 October 2009 covering palm oil plantation area of 16.011,97 ha and mill processing capacity of 60 ton/hour. As well as, the company has comply with agrarian act, shows by has obtained the HGU document for area of 14,892 Ha, which the remaining is in progress.

Best Management Practices

Based on the results of document review and field observations, it is known that certificate holders have complied with regulations related to best management practices, including:

- The certificate holder does not clear land by burning according to Law No. 18 of 2004. Based on the results of document review and field observations on operational activities in Sesulung Estate, Pondok Labu Estate, Rampak Estate, Binturung Estate and as well as replanting and planting areas in 2018, no trace of burning was found, but the former was found decay of rods that are mechanically.
- The certificate holder conducts periodic checks and tests on tools or machines, for example in Pondok Labu Estate on February 4, 2019 in collaboration with PT Dohmon Jaya Mandiri, has inspected 1 unit of Air Compressor, 1 unit of generator set 45 KVA No. 1 in Division 1, 1 unit of generator set 45 KVA No. 2 in Division 2, 1 unit of generator set 45 KVA No. 4 in Division 4, 1 unit of generator set 100 KVA No. 3 in Division 2 and 1 unit of welding machines and all are stated in good condition and when the audit is taking place in administrative process.

OHS

- The company has undertaken prevention and control measures as listed in Safety Act no. 1 of 1970 Article 3, among others by monitoring the implementation of occupational safety and health, conducting accident investigations, hazard risk analysis, medical checkup, machine operation by persons authorized and socialized safe work practices. Based on the results of document review and interviews with factory workers, for example at boiler stations, it is known that boiler operators have licenses to operate boilers in accordance with Minister of Manpower Regulation No. 1 of 1988.
- The company routinely conducts periodic testing of tools and machines carried out every year, in this case the company shows a sample Examination Minutes document by PT Dohmon Jaya Mandiri with number 04-BAP / DJM-BPN / II / 2019 regarding notification of inspection and Periodic testing of tools / machines on the Binturung Estate include: air compressors, generator sets, welding machines and road compactors. In the minutes it was explained that the tool / machine was in good condition and ready for use.

Environment

The company has implemented regulation related environment such as: regulation of government number 27 year 2012; Discussion of Environment Minister Number 28 year 2003; Permit of hazardous waste store; Regulation of government Number 82 year 2001 and others.

Environmental Document : Environmental Impact Assessment document (EIA) of Oil Palm Plantations and Plantations on behalf of PT. INDOAGRI INTIPLANTATION (PT Laguna Mandiri, PT Langgeng Muara Makmur, PT Paripurna Swakarsa and PT Swadaya Andika) Year 1994. The scope of acreage for PT. Paripurna Swakarsa plenary of 22,800 Ha (Survey Result of Land Inspection B No. 04 / RIS-HGU / 1991 dated August 21, 1991) with the capacity of oil palm processing factory installed 60 tons of FFB / hr.

Employment

Related to implementation of workers wages, referring to Kalimantan Selatan Governor Decree No. 188.44/0598/KUM/2018 dated on November 19, 2018 regarding to minimum wage of regency 2019 is IDR. 2.796.819,62per month.

The results of document review, interviews with relevant agency (Manpower Agency) and Labor union representatives conveyed that the company had complied with local and national labor regulations.

2.1.2, 2.1.3, 2.1.4

The Company has a Legal Requirement Procedure with No. Policy 301 / PSA-HKM-05/17) on May 1, 2017. In the SOP explained that Manager and team (PSQM Dept.) were appointed as person in charge to manage the document compliance system regulations and evaluation of compliance with regulations is carried out every year.

The company has a list of legal requirements contained in the List of RSPO-related Regulations in 2019. There are a total of 224 lists of regulations with all of them fulfilled in accordance with the evaluation of regulations. Based on the verification of the document, there are still regulations that have not been contained in the list of company regulations, for example but not limited to:

- Government Regulation no. 78 of 2015 concerning Wages.
- Government Regulation No. 44 of 2015 concerning the Implementation of accident insurance and life insurance Programs
- Government Regulation No. 45 of 2015 concerning the Implementation of the Pension Guarantee Program
- Government Regulation No. 46 of 2015 concerning the Implementation of the JHT Program
- *Permenaker* no. 3 of 1986 concerning OHS of Pesticide Requirements.
- Kalimantan Selatan Governor Decree No. 188.44 / 0598 / KUM / 2018 concerning Regency / City Minimum Wages.

NC No. 2019.2

Minor 2.1.2	Status: Non-Conformity No.2019.02	open
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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

The total cultivated area of PT PSA is **16,012 Ha**, which is area of **14,892 Ha** has granted the land title (HGU) namely HGU certificate no.: 14 year of 1997, valid for 35 years up to 22 November 2032.

The company has processed the HGU for the discrepancy area of 1,119.97 ha since 2008. Until ASA-1.2, the company can show the progress of the HGU issuance which currently has reached the cadastral measurements and evaluation of Committee B-BPN. Cadastral measurements were carried out in June 2018 by BPN of South Kalimantan Province, measurements were made on 3 fields requested by the company, namely ± 113 Ha in Pondok Labu, ± 827 Ha in Binturung and ± 164 Ha in Pondok Labu. Sighted the minute of BPN Committee B evaluation regarding to the HGU of PT PSA on 11 October 2018. Of the total ± 1100 ha requested, it has been approved to be granted the HGU for an area of 914.45 ha. In this case, there was a discrepancy between the cultivated area and the total of HGU and HGU approved, area of **205.52 Ha**. It has been raised as **NCR No.: 2019.3**.

The company has submit the report of HGU used to the BPN of Kotabaru Regent for period of 2018 on 26 March 2018.

2.2.2

Sighted the BPN boundary map in the entire unit which informs total of pole, scale, coordinate and pole's number. The company has the SOP as a guideline for monitoring and maintaining the legal boundary, namely: SOP *Pemeliharaan Patok HGU* (PM 3001) dated 10 Jan 2010 and internal memo of Chairman RSPO No. 01/SOU-PTH HGU/V/2017 dated 4 Mei 2017, mentioned in those document that boundary monitoring and maintenance hold twice a year.

All unit provide the program of HGU poles monitoring and report its implementation for 2018/2019. The units has set the plan for BPN poles maintenance to follow the monitoring result, it considered to be implemented by all estate. **OFI**

At time of ASA 1.1, there is a non-conformance regarding the RPE cannot show evidence of monitoring of HGU pole according to the required in the SOP owned (**NCR No. 2018.03**).

Verification are done on ASA-1.2. The company has identified the root cause, conduct the correction and set corrective action plan against it.

Observed the a report of the HGU monitoring performed by the RPE in October 2018 (next monitoring will be conducted in March 2019), based on the results there were 14 missing, 1 damaged, 1 position leaning and 3 poles with numbers unreadable. Currently, the unit in the process of making new poles to replace the damaged and missing poles.

The corrective action determined is that the company sets a monitoring schedule to be twice a year and assigns special officers for its implementation. Head Adm. was tasked to documenting all HGU boundary monitoring and maintenance reports. **The evidences had been verified and accepted to be closed out and complied.**

2.2.3, 2.2.4, 2.2.5, 2.2.6

Based on the area of the statement, field observations and interviews with the community in Pondok Labu Village stated that currently there were no land disputes between the community and the company.

The mechanism of conflict settlement specified in the document of SOP *Penyelesaian Konflik*, which was approved by the Chairman of the SOU on April 9, 2011.

The company shows the document of SOP *Pembebasan Lahan Okupasi*, document number 343 / PSD-OKUP / 11 issued on February 23, 2012. In the procedure described for each occupational land should done a survey and discussed on the land committee to decide whether to be released or not, the process of land acquisition is carried out by means of socialization , negotiations and compensation payments are carried out in accordance with the agreed price.

PT PSA has a Prohibition Policy for the Use of Mercenaries or paramilitaries in the company's operations, according to a letter from the Chairman of SOU11 Pondok Labu POM to all managers and staff on 1 December 2015. During the ASA 4, no found any of paramilitary and mercenary in the operation area, it was in line with the interview result with the community in Pondok Labu Village.

2.2.1	Status: Non-Conformity No.2019.03 with Major category
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2.3 Use of the land for oil palm does not diminish the legal rights, or customary rights, of other users, without their free, prior and informed consent.

2.3.1, 2.3.2, 2.3.3, 2.3.4

On the HGU document, explained that the company's area was State land that had obtained an reserve permit for an area of ± 22,800 ha located in Pamukan Selatan District and Pamukan Utara from the Governor of Kalimantan Selatan through decree no.: 08 / PL.84 / 1989 / BPN-43 dated May 31, 1989. These area also been released from the forest area through decree of Minister of Forestry no.: 523 / KPTS-II / 1994 dated November 16, 1994 concerning Permit for the Release of Production Forest Areas for PT. PSA covering an area of 21,744 ha.

There has been no new development and no new planting by PT PSA since ASA 1.1. The land compensation process was carried out and completed in 2008.

The company has an occupational land acquisition SOP, document no.: 343 / PSD-OKUP / 11 issued on February 23, 2012. In the procedure described that for each land that will be acquisitioned should be surveyed, discussed on the land committee. The process of land acquisition is carried out by means of socialization and negotiations. Compensation payments are carried out in accordance with the agreed price. SOPs and documents are available in Bahasa.

Based on the HCV document and results of interviews with the owners of previously cultivated land in Pondok Labu Village, it was stated that there were no customary rights or traditional rights in the company's operational area. Furthermore, they told that during the compensation process for growth-crops in the community arable land was carried out by the company with a mechanism of non-coercive negotiation, joint measurement, pricing negotiations involving relevant agencies and payment to the direct owner and/or group representatives.

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

Unit certification shows the projected production in 2019 until 2023 which explains the projected needs of seeds, FFB production, OER projections, the estimated cost of production, CPO price forecasts, and expected profits, replanting program and CPO production projections for the next 5 years.

Management conducts evaluations every month towards achieving the targets set, for example through the estate and mill

monthly report documents.

The certificate holder also shows the financial account audit report carried out by the Public Accountant Office for the period 30 June 2018. Based on the opinion of the audit results stating that the financial statements, position and performance of PT Paripurna Swakarsa until 30 June 2018 are presented fairly and in accordance with financial accounting standards Indonesia.

3.1.2

The certificate holder shows the replanting program (replanting) projected for a minimum of the next five years, including:

- Binturung Estate namely 2018/2019 program covering 177.11 ha, 2019/2020 covering 241.22 ha, 2020/2021 covering 163.88 ha, 2021/2022 covering 219.04 ha and 2022/2023 covering 198.63 ha.
- Pondok Labu Estate, namely the 2019 program covering 177.65 ha, 2020 covering 223.64 ha, 2021 covering 185.28 ha, 2022 covering 172.94 ha and 2023 covering 181.93 ha.

The certificate holder also documented the progress of the replanting implementation, for example in the document Realization Replanting Pamukan 2 Area 2018 (BNE, PLE, RPE and SSE) update on February 2, 2019 which explained the realization of chopped up area of 220.88 ha and making terrace of 13,679 meters.

Based on the results of field observations in Binturung Estate block F22-23 Division 2 related to replanting activity, it was found that heavy equipment was working on making a terrace.

Status: Comply

PRINCIPLE #4 Use of appropriate best practices by growers and millers

4.1

Operating procedures are appropriately documented and consistently implemented and monitored.

4.1.1

The certificate holder has a documented procedure for the mill and plantation. The plantation procedure starts from the plant material procedure, then the technique of nursery, fertilization, weed control, integrated pest management to harvesting and its transport is stated in the document of Standard Operating Procedure (SOP) of *Referensi Manual Agronomi Penanaman Kelapa Sawit*, document number 110 / EST-ARM / 13, September 2013 signed by the Head of Upstream Plantation Indonesia. This document has been distributed on September 16, 2013 to all plantation and factory unit leaders. The certificate holder also has procedures for the process of receiving fresh fruit bunches to send the CPO and kernels listed in the *Pedoman Teknik Pabrik Kelapa Sawit* of the Part I and II palm oil mills Minamas Plantation dated April 30, 2007.

Generally, operational procedures have been socialized to all employees in accordance with their respective fields of work. Based on field observations at Pondok Labu Estate, Sesulung Estate and Binturung Estate on harvesting, pesticide application, circle raking and replanting activity found that employees can show how to work in accordance with existing procedures, such as harvest workers can explain the criteria of the harvest and spray workers can explain the workings of the start preparation until finish of work.

4.1.2

The certificate holder routinely conducts activities of inspection or monitoring of activities in accordance with the operating procedures carried out by direct supervisors of the workers, for example the foreman, foreman I, assistant, senior assistant, manager and so on. In addition, there are also several routine corporate internal monitoring activities every 6 months or at least once a year. Officers who carry out audits and evaluations have competencies as determined by the certificate holders carried out by Plantation Advisory, Mill Advisory and Plantation Services Quality Management, for example in October 2018 conducted in Binturung Estate and Sesulung Estate in June 2018.

4.1.3

The certificate holder has and shows the results of the monitoring and evaluation activities and their follow-up. Internal monitoring and monitoring records of Plantation Advisory, Mill Advisory and Plantation Services Quality Management are in the unit office, for example, briefly described in the monitoring activities of the following 2018 period:

- Binturung Estate shows the Oil Palm Immature Field document by the Performance Monitoring Unit in October 2018. Among them are discussing findings related to replanting activities. There were 8 findings of non-conformity including those related to the delay in field and were corrected in December 2018 by carrying out controls on time. All non-conformities have been

corrected in December 2018.

- Sesulung Estate shows Loose Fruit Checkpoint Report Infield conducted by Plantation Services Quality Management, for example on June 21, 2018 in Division 4 in Field U-002 in 1997 with harvest intervals of 13 and FFB of harvest 41. Based on the results of checking there was no FFB left.

4.1.4

Up to the implementation of the Surveillance 1.2 Assessment, Pondok Labu Factory does not receive the supply of fresh fruit bunches from outsider, all of the processed FFB comes from the own estate of Pondok Labu Estate, Sesulung Estate, Rampak Estate and Binturung Estate and KKPA Sungai Cengal (associated smallholder under PT LMR).

Status: Comply

4.2

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

4.2.1

The certificate holder has procedures related to fertilization activities contained in the Agricultural Reference Manual (ARM) No. Policy 110 / EST-ARM / 13) Part 8 concerning Fertilization of Oil Palm Plants which includes fertilization techniques, application of empty fruit bunch and application of compost to immature and mature plant, placement of fertilizers and application of fertilizers by 'focal feeding' on marginal inland soils. The implementation of the SOP is monitored periodically with an operational audit or Plantation Advisory. In addition, fertilization is monitored by the foreman and assistant and re-evaluated by the plantation manager.

Based on the results of observations and interviews with management, it is known that at the time of ASA-1.2 assessment there was no fertilization activity because many areas were flooded due to heavy rains so fertilizer workers were diverted their work to manual maintenance or loose fruit picking activities. From the results of interviews with fertilizing workers who are being transferred to work, such as in Sesulung Estate and Binturung Estate, it is known that manual fertilization using doses according to the dose refers to fertilizer recommendations. The foreman records the results of the work in accordance with the actual work of the day.

4.2.2

The certificate holder has documented the use of fertilizer in each estate, such as HGFB fertilizer, NK-Blend and RP. For example, based on the document of Plans and Realization of Fertilization and Monitoring of Fertilization in the 2018 period briefly described fertilization application as follows:

- Binturung Estate has realized 899,618 tons of NK-Blend fertilizer from the recommended 899,618 tons.
- Sesulung Estate has realized 506,414 tons of RP fertilizer from the recommended 506,414 tons.

In addition, the certificate holder also has a document on the realization of fertilization which explains the amount of fertilizer used per type of fertilizer, production of FFB and the comparison between fertilizer and FFB production. Based on the document, it is known that the average use of fertilizer per ton of FFB, for example in Binturung Estate for HGFB fertilizer type is 0.73 kg / tons FFB.

Based on the results of document review related to **non-conformity No.2018.04**, the certificate holder showed evidence of improvement in the form of a Program and Realization of Rampa Estate Fertilization 2018 document which explained that for carry forward fertilizers the period 2017/2018 was completed in the period 2018 (January - June) and fertilization programs for the period January - June 2018 were completed according to the program. Accordingly. **The evidences had been verified and accepted to be closed out and complied.**

4.2.3

The certificate holder has and shows records of soil and leaf analysis activities on a regular basis in accordance with the procedure, namely frequency of soil sampling to find out nutrients in the soil is carried out every five years and leaf sampling is done once a year and it is explained that when sampling leaves trees that experience nutrient deficiency characteristics.

The certificate holder has recorded soil sampling activities in the Semi-Detailed Land and Land Suitability Survey document for Palm Oil Plants in PT Paripurna Swakarsa 2016-2021 by Minamas Research Center which explains soil management and results of soil analysis with nutrient parameters N, P, K, Mg, Ca and B.

In addition, the certificate holder also shows leaf sample records in the *Laporan Pengujian Analisa Jaringan Tanaman Minamas Research Centre Laboratory Services* Teluk Siak conducted in May 2018 for the Rampa Estate and Pondok Labu Estate units and explains the nutrient levels of N, P, K, Mg, Ca and B.

Visual analysis is done simultaneously with the leaf sample test. The results of the visual analysis serve as an ingredient to make fertilizer recommendations. Leaf test results conducted by the MRC team are then sent to the unit already in the form of fertilization recommendation for next year fertilization period.

4.2.4

The certificate holder recycles nutrients by applying empty fruit bunches and palm oil mill effluents. For fibers, shells and boiler ash are not used as recycling of nutrients but are used as boiler fuel.

The certificate holder shows the program and the realization of monthly empty fruit bunch applications for the period July - December 2018, including Pondok Labu Estate has realized 976.08 tons from 18,090.69 tons programmed.

In addition, the certificate holder also showed application documents for liquid waste, for example in September 2018 at Pondok Labu Estate block H019 there was applied a POME of 43.41 ha (15,094 m³).

However, based on the results of document review, interviews with management and field observations, there were non-conformities related to the implementation of empty fruit bunch recycling of nutrients, namely as follows:

- The empty fruit bunch application program for the period July - December 2018 has not been realized according to plan, for example in the Sesulung Estate program 2,777.95 tons applied 370.73 tons and in the Binturung Estate program 6,240 tons and applied for 3,590 tons, this is in line with the results of field visits that many empty fruit bunch which accumulate and have not been applied to the land either in the mature plant area or in the immature plant area, for example in the block L48 Division 2 Sesulung Estate and block D14 Division 2 Pondok Labu Estate.
- There are empty fruit bunch which are not in accordance with the program block and are not applied, for example in Sesulung Estate block L51.

The foregoing is not in accordance with the document Agricultural Reference Manual (ARM) No. Policy 110 / EST-ARM / 13 Part 8 concerning Fertilization of Palm Oil Plants. **This is a non-conformity NC.2019.4.**

4.2.4	Status: Non-conformance NC.2019.4 with minor category	
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4.3

Practices minimize and control erosion and degradation of soils.

4.3.1, 4.3.2 and 4.3.6

The certificate holder shows the land map listed in the Semi-Detailed Survey Soil Report 2016 - 2021 which explains that there is no marginal land such as peat soil. However, there are areas with slopes that have been treated with terrace treatment and contour making.

The certificate holder has identified a slope area not suitable to be planted, then the certificate holder gives treatment by making the terrace when replanting. For example, the results of identification of terrace replays in Sesulung Estate December 2018. Based on these documents, it is known that there are slope areas that will be made of terraces, namely in the Field O004 of 34,632 meters and Field O005 of 15,083 meters.

Based on the results of field observations in Binturung Estate block F22-23 Division 2 related to replanting activity, it was found that heavy equipment was working on making a terrace.

4.3.3

The certificate holder shows the documents program and realization of road maintenance, for example for Pondok Labu Estate shows documents on Road Conditions / Situations and Realization of Road Quality Improvement in 2018 which explains, among others total damaged collection road 55,158 meters and main road 17,837 meters. Realization of Road Quality Improvement namely collection road 23,672 meters and main road 16,368 meters.

For Binturung Estate shows documents on Road Conditions / Situations and Realization of Road Quality Improvement in 2018 which explains, among othersthe total collection road damaged 49,677 meters and main road 9,508 meters. Realization of Road Quality Improvement namely collection road 18,362 meters and main road 15,411 meters.

Based on field observations in Pondok Labu Estate, Sesulung Estate, Rampa Estate and Binturung Estare, it is known that road maintenance continues to be carried out such as rock buildup, using heavy equipment such as road graders for road

normalization, concreteisation and so on. In addition, rainy weather conditions also do not fully support road improvement programs.

Based on the results of document review related to non-conformity No.2018.05, the certificate holder shows proof of improvement in the form of a Road Condition Map document period 2017/2018 that describes the road conditions (good or damaged), details of the length of the road and its condition and photos of road conditions. In addition, the company also shows the Road Quality Improvement document period 2017/2018 that explains repaired road points, detailed road lengths that have been repaired and photos of road conditions after being repaired. **Accordingly, the non conformity No.2018.05 is closed.**

4.3.4 and 4.3.5

Based on a review of the Semi-Detailed Soil Survey Report and land suitability for oil palm plants for the 2016-2021 period of PT PSA carried out by the MRC, it was informed that there was no peat land in the company's operational area.

Status: Comply

4.4

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

4.4.1 and 4.4.2

Certificate holder has consistently set water management strategies that were implemented. Several strategies as follows:

- Protecting riparian from chemicals contamination. The company has installed sign as prohibiting application of pesticides and fertilizers. It sign board has socialized to all workers. The signs can be red painting in palm tree or sign board.
- Surface water monitoring every semester. Water analysis conducted by Testing Laboratory PT Sucofindo (accredited by National Accreditation Committee/KAN LP-258-IDN). Based on the last tests on August 2018 in all parameters still accordance to surface water quality threshold.

Based on interview with the surrounding community are known that until now there has never been pollution in the river around the plantation area. Based on field observation in Sanipah and Separe River known that there were no indication of pollution. The results testing of surface water (upstream & downstream Separe river) on semester II 2018 (August, 2018) by Testing Laboratorium PT Sucofindo with parameter of TDS; TSS; pH; BOD; and others didn't exceed the thresholds.

4.4.3

Based on field visit on Pondok Labu Factory shown that mill effluent produced by Factory are distributed on cooling pond firstly, and then flowing to anaerobic pond. Mill effluent has been monitored every months and monitoring period January - August 2018 shown that all of effluent testing parameters is compliant to the standards quality, for example BOD on August 2018 are 420 mg/l. Mill Effluent management also was reported and submitted quarterly to Environmental Agency of Kotabaru. Company also owned land application permit based on The Regent's Decree No.503/05/IPAL-BPPTPM/2016 is valid for 5 years from December 21, 2016 to December 22, 2021.

4.4.4

Based on field visit on Pondok Labu Factory water treatment plan and interview with WTP operator found that mill water usage monitoring are conducted on regular daily basis based on flow meter reading. Standards of water usage for FFB process recorded on 2018 budget projected 2.00 m³/MT FFB process. Water usage monitoring was done periodically and recorded, for example on November 2018 FFB processed were 22,750 MT, process water usage 45,500 m³, and water usage efficiency was 1.63 m³/MT FFB process.

Status: Comply

4.5

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

4.5.1

The certificate holder has the IPM plan listed in the *Referensi Manual Agronomi Penanaman Kelapa Sawit*, No. Policy 110 / EST-ARM / 13. These procedures include explaining the frequency of census attacks, control techniques to justify the use of chemicals. In addition, also explained about pest types such as horn beetles, nettle caterpillars, bag worms, rat pests and ganoderma diseases.

Based on the results of interviews with management, currently potential pests based on census are horn beetle pests (*Oryctes rhinoceros*) in immature plant area. Census data was recapitulated in the *Oryctes rhinoceros* Attack Census Recapitulation and Control report, for example in the January 2019 report at Pondok Labu Estate, it was found that the census results of January 8, 2019 there were attacks of *Oryctes rhinoceros* in the G31 block which exceeded the threshold value and were chemically controlled using the active ingredient cypermethrin on January 10, 2019.

The certificate holder also controls pests using beneficial plants and making owl cages. For example in Binturung Estate, the data presented included planting 31,876 m of *Casia cobanensis*; *Antigonon leptopus* as much as 1,437 m; *Turnera subulata* along 4,546 m. For Pondok Labu Estate, it is known that there are 87 units of Barn Owl Box available.

Based on the results of the field visit, the certificate holder has implemented biological pest control in accordance with the SOP for example the installation of the Barn Owl Box in Binturung Estate Blok D30 as the residence of the owl (*Tyto alba*) and in active condition. In addition, at each edge of the block the company has managed the beneficial plant with *Turnera subulata* and *Antigonon leptopus* types. Based on the results of document review and field observations, it is known that the use of chemicals is carried out if the census results have exceeded the threshold and are not prophylactic.

4.5.2

The certificate holder shows the training records provided to the labor involved in the integrated pest control process, including:

- Integrated Census and Pest Control Training on February 19, 2018 to 6 participants from foremen and pest control workers at Pondok Labu Estate
- Trunk Injection Training on November 6, 2018 to 14 participants from foremen and pest control workers at Rampa Estate

Based on interviews with pesticide applicators and IPM foremen at Pondok Labu Estate, it was explained that training had been provided and could explain the method of census and actions if above the threshold.

Status: Comply

4.6

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

4.6.1

The certificate holder has procedures related to chemical activity such as herbicide application and pest control. This procedure is contained in the Agricultural Reference Manual (ARM) (110 / EST-ARM / 13) on the crop protection section of pests and diseases and weed control in general. In addition, this procedure also explains weed control in general that pesticides are used selectively for specific targets, as well as explaining doses per ha and dilution doses. The certificate holder also uses pesticides listed on the pesticide commission according to the target in the field.

Based on the results of field observations in Pondok Labu Estate block G34, spraying was carried out using pesticides made from active ingredients of Sipermetrin (Capture) to control *Oryctes rhinoceros* in immature plants area. In addition, based on the results of field observations in Binturung Estate block H27, spraying was carried out using herbicides made from active ingredients isopropyl amine glyphosate (Ken Up) and methyl metsulfuron (Kenly) to control broad-leafed weeds on the mature plants area.

4.6.2

The certificate holder shows the Pesticide Use Recap document in 2018, for example at Pondok Labu Estate which explains the use of agrochemicals per type of chemical, active ingredients, units, total materials used and active ingredients / Ha. For example, for the use of Capture with the active ingredient Cypermethrin, the total use is 100 L, the application area is 3,588.1 Ha and the total application is 0.07 liters of active ingredients / ha.

4.6.3

The certificate holder operates an integrated pest control system by collaborating on biological and chemical controls. The use of chemical techniques is not preventive, but based on the results of the early warning and census system.

Based on the census recapitulation and control documents, it is known that there are several census realization that have been carried out by officers, including:

- Based on field visits, the certificate holder has implemented biological pest control in accordance with the SOP for example the installation of the Barn Owl Box in Binturung Estate Blok D30 as a place to live owls (*Tyto alba*) and it is known that it is active in the presence of bird droppings and food scraps.
- Barn Owl Box Residential Condition Map January 2019 Pondok Labu Estate, it is known that there are 26 new units, 52 good conditions and 9 units damaged condition. The total currently available is 87 units.

- Report in January 2019 at Pondok Labu Estate, it is known that the results of the January 8, 2019 census there were attacks of *Oryctes* in the block G31 which exceeded the threshold value and were chemically controlled using the active ingredient cypermethrin on January 10, 2019.

4.6.4

Certification unit has a complete list of pesticides that are designated World Health Organization (World Health Organisation) Class 1A or 1B, or listed in the Stockholm Convention or Rotterdam. The list contained in appendix 2 SOP Sustainable Plantation Management Guideline No. Policy 724 / TQEM-SPMS / 09 published August 27, 2010. The unit of certification does not use pesticides paraquat and pesticides belonging to the class 1A or 1B. This is confirmed by a policy of not using Paraquat is outlined in the memorandum of the Head Plantations Operation (number: POD-UM-127 / X / 2008, dated November 4, 2008) the Recommendation Replacement Application Active Ingredients Paraquat-Gramoxone at Minamas. To minimize and eliminate the use of pesticides (WHO groups 1A and 1B) and paraquat, the certificate holder has implemented several efforts including:

- Based on field visits, the certificate holder has implemented biological pest control in accordance with the SOP for example the installation of the Barn Owl Box in Binturung Estate Blok D30 as a place to live owls (*Tyto alba*) and it is known that it is active in the presence of bird droppings and food scraps.
- Based on the results of field observations in Binturung Estate block H27, spraying was carried out using herbicides made from active ingredients isopropyl amine glyphosate (Ken Up) and methyl metsulfuron (Kenly) to control broad-leafed weeds on the mature plants area.

Based on document reviews and visits to chemical warehouses, it is known that the company does not use chemicals categorized as WHO 1A or 1B types and materials included in the Stockholm and Rotterdam Conventions, and paraquat lists.

Based on the results of document review related to non-conformity No.2018.08, the certificate holder shows proof of improvement in the form of a Policy for Decreasing the Use of Class 1A and 1B Pesticides on 1 December 2018 and Pesticide Usage per Hectar and Per Ton document FFB Production Rampa Estate which explains the types of pesticides used during the period July 2017 - June 2018 which are not included in the category World Health Organization Class 1A or 1B, or listed in the Stockholm or Rotterdam Conventions. **Accordingly, the non conformity No.2018.08 is closed.**

4.6.5

The company has a Chemical Handling Procedure with the number PLF/SOP.ESH/04 dated January 11, 2011. However, based on the results of field observations, it is known that the implementation has not been in accordance with the company's procedures as follows:

- Not all chemicals in the warehouse PLE equipped with MSDS, for example MSDS for kenlon, kenly, ken up. In addition, there are MSDS in English such as lifeline, racumin and spreader.
- Not all chemicals in the warehouse have MSDS such as antracol, racumin, cozeb, lifeline on BTE.
- There are MSDS in English at SSE such as racumin, abolition and lifeline.
- During interviews with spray workers at Sesulung Estate, workers did not understand the MSDS.

Based on the above, the auditor determines it as a non-conformity **NCR No. 2019.05**

4.6.6

Based on the results of document review and interviews with management related to the pesticide storage procedure, it is known that there was no change from the previous assessment, which was listed in the SOP on Chemical Handling (PLF / SOP.ESH / 04 dated 11 January 2011).

Based on the results of field observations at PLE, RPE and SSE, it was found that no used pesticide packaging was used for other purposes. Based on the results of interviews with workers on herbicide application activities, for example in PLE and SSE, it is known that used pesticide packaging is cleaned and collected in temporary storage areas of hazardous and toxic waste and used washing water of work tools and personal protective equipment are reused for mixing spray.

Based on the results of field observations in the Pondok Labu Estate and Sesulung Estate housing, it was found that there were no former pesticide containers used as trash bins or flower pots.

However, based on the results of field observations in the Rampa Estate pesticide warehouse, it is known that the storage of chemicals for pesticides / herbicides is mixed with other materials such as fire extinguishers, water tanks and water pipe.

Based on field observations to Binturung Estate found Kencepat pesticides are located in public warehouses and office Division 2 BNE.

This is not in accordance with Minister of Manpower Regulation number 3 of 1986 concerning *Syarat K3 di Tempat Kerja yang Mengelola Pestisida* (OHS Requirements in Workplaces that Manage Pesticides). **NC 2019.06**

4.6.7 and 4.6.9

The application of pesticides in the field has been through proven methods to minimize the risks and negative impacts as informed in the Material Safety Data Sheet document on general guidelines on safety in working with pesticides, including guidance safe in selecting pesticides, storing pesticides, and using pesticides for example: the selected pesticide formula must be in accordance with the intruder's remains because a pesticide formula will only be effective against one particular type of pest.

The company shows training documents to employees and scheme smallholder related to the use and handling of pesticides as follows:

- Training on spray techniques and handling of pesticides on August 26, 2018 is located at Division 3 Sesulung Estate. Documentation, material and attendance lists are available during the audit activity.
- Training on spray techniques and handling of pesticides on November 23, 2018 located at Division 1 Rampa Estate. Documentation, material and attendance lists are available during the audit activity.
- Training on spray techniques and handling of pesticides on November 13, 2018 located at Division 2 Binturung Estate. Documentation, material and attendance lists are available during the audit activity.

Based on field observations and interviews with pesticide applicators on Binturung Estate, Rampa Estate, Pondok Labu Estate and Sesulung Estate are known as follows:

- Employees have understood work procedures that are safe in using chemicals such as spraying techniques, target weeds for each pesticide, use of PPE and actions taken when poisoning occurs.
- Regular employees get direction from supervisor before work and also get regular internal training by the company.
- The company provides facilities for mixing pesticides, storing work tools and PPE as well as places for bathing employees when completing the application of pesticides.
- Employees bring food from home, the company in this case provides clean water and soap to clean hands before eating and the location of the place to eat must be different from the location of the application of pesticides.
- The company provides PPE for each employee free of charge and if damaged will be given a replacement PPE with the provision of returning the damaged PPE.
- Supervisors always carry a first aid kit that will be used as first aid when there is a work accident. The results of checking are known that the contents of the first aid kit are complete and ready to use.

4.6.8

Based on the results of a document review, information from management and field observations, it is known that spraying is not applied by air.

4.6.10

CH possesses procedure for Toxic and Hazardous waste including ex agrochemicals management listed on No: 701/IK-TSA-ESH/10. These procedure stated that all ex chemicals containers were kept on temporary hazardous storage at BNE, RPE, PLE and SSE. Training for workers and staff regarding hazardous & toxic material handling conducted on October 2018. Based on interview with spraying worker found that workers recognized how to properly disposed waste materials and workers have been trained by company about waste and hazardous materials handling.

Record of hazardous waste management included in report of hazardous waste management which quarterly sent to environment agency, such as report of on October s/d December 2018. The results of interviews with Pondok Labu Estate Spray Workers, Sesulung Estate and Rampa Estate revealed that workers were aware of the management of used pesticide containers, which were rinsed at the pesticide packaging site and collected in the Schedule Waste Storage. Based on the results of field visits it is known that the packaging of pesticides is stored in the Pondok Labu Factory Schedule Waste Storage.

4.6.11, 4.6.12

The company shows the data of Medical Check Up Result on January 2019 for estate and mill worker. Medical check-up include physical examination, audiometry, cholinesterase and spirometry. The examination results show that all employees are fit and ready to work. Based on the results of interviews with spraying worker, it is known that the results of the examination have been

informed to workers in private and workers feel no complaints or indications of skin disease, irritation or itches.

The company has a mechanism to identify pregnant and lactating mothers listed in the Healthy Periodic Employee Health Examination Procedure for Working under number 735 / TQEM-ESH / 10 dated December 1, 2010. In point 12 it is explained that prenatal care is conducted by paramedics or doctors against female employees, and when the employee has received an introduction to prenatal care from the division assistant and if he has obtained information that the employee is declared pregnant then a pregnancy certificate will be made and it is also recommended to be transferred to work other than work using chemist.

The company shows a sample certificate of pregnancy in Rampa Estate for spraying operator dated 12 November 2018. The company also shows a pregnancy monitoring document for the period of 2018 which explains that there are 3 employees who were declared pregnant.

During field observations and interviews with spray workers in both the Sesulung Estate and Rampa Estate units, it was found that there were no pregnant workers and workers who knew the prohibition of breastfeeding and pregnant women to apply pesticides. The overseer also stated that if there were female workers experiencing signs of pregnancy, the person concerned would report to the foreman or staff and immediately go to the clinic.

4.6.5	Status: Non-Conformity No.2018.05 with major category
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4.6.6	Status: Non-Conformity No.2018.06 with minor category
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4.7

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

4.7.1

Policy related to OHS still the same as previous assessment, namely policy OHS passed by CEO Minamas Plantation dated December 2011. The policy indicates company commitment towards OHS implementation through:

- To communicate policy and OHS procedures to all employees and stakeholders which have interest.
- To comply with government OHS related regulations.
- To ensure implementation of OHS as a part of operational process.
- To identify, appraising, and control of continuous improvement in order to avoid work accident.
- To manage and monitor OHS indicators and conducting a continuous improvement.

Based on interview with workers known that they have been known about the OHS policy. They also said that assistant perform morning briefing every day before starting work.

4.7.2

The company has 2018 Hazard Identification Risk Assessment and Risk Control (HIRARC) evaluation document that describes the hazards, impacts, control measures and personal protective equipment for each job. However, based on the results of document verification there are several activities that have not identified potential hazards, for example, but not limited to:

- FFB arranging on trucks, based on the results of field observations in Division 2 of Pondok Labu Estate.
- The activity of storing PPE and carrying PPE back home by employees for spray worker, fertilizers and harvest work tools. This is based on the results of observations and interviews with spray worker of Pondok Labu Estate, Rampa Estate and Sesulung Estate fertilizer employees. It is known that PPE is washed in the field, taken home because they do not have PPE storage.

In addition, based on field observations it was found that implementation was not in accordance with the HIRARC documents owned by the company, for example:

- Harvesters at Rampa Estate do not use PPE (helmet) when working.
- The Rampa Estate warehouse officer did not use the appropriate PPE when entering the pesticide warehouse
- The fertilizer employees of Binturung Estate do not use PPE (gloves and masks)
- Rampa Estate spray worker use masks that are not in accordance with company standards
- The boiler operator does not use a mask when refueling (inserting fiber into a fuel supplier)

Based on the above, the auditor determines it as a non-conformity **NCR No. 2019.07**

4.7.3

The company has a Personal Protective Procedure with number 739 / TQEM-ESH / 10 dated November 1, 2016. In point 6.1 some things are explained as follows:

- PPE must be replaced as soon as it is found that it does not guarantee protection.
- Except PPE Shoes will be given once a year according to the budget set by the management unit.
- For the replacement of PPE Shoes that are damaged before one year must meet the requirements for example: reporting to superiors, submitting evidence of damaged shoes, damage due to use for work and chronological delivery of care and storage. If it is correct, a replacement will be made.

Based on the results of field observations and interviews with employees in the estate and factory it was found that the application of PPE SOPs was not maximized, for example:

WTP operators use safety shoes in damaged condition

- FFB Loader Division 2 PLE said that shoes were purchased by themselves because there was no replacement from the company.
- An interview with harvesters on Block D15 in Division 2 of PLE mentioned that the boots used were bought by themselves.
- Interview with PLE spray and IPM employees said that shoes were bought by themselves
- FFB loaders in Division 3 SSE do not use helmets and shoes.
- An interview with spray employees at RPE stated that PPE shoes bought themselves
- Interview with manual care worker Div 3 BNE states that shoes are provided once a year, if damaged cannot be exchanged and must buy it yourself.

The results of interviews with the Department of Manpower and Transmigration of Kotabaru Regency are known that the company can arrange the schedule for providing PPE to employees, but companies are required to provide PPE to employees when employees work for free.

Based on the evidence above, the company has not been able to show evidence that the use and provision of PPE is in accordance with the SOPs that are owned and the applicable regulations (*Permenakertrans* No. 8 of 2010). Based on the above, the auditor determines it as a non-conformity **NCR No. 2019.08**

4.7.4

- Pondok Labu Factory
The company shows the Decree of the Head of the Manpower and Transmigration Office of South Kalimantan Province with number 566/443/Was-NKT/2018 dated September 3, 2018 concerning the Approval Letter of Pondok Labu Factory OHS Committee Structure in 2018. Pondok Labu Factory has OHS Expert on behalf of Arif Sucipto with registration number 46450/PK3/AJ/31/2017/PO. Minister of Manpower Decree of the Republic of Indonesia with number KEP.10469/NAKER-BINWASK3/XII/2017 concerning Appointment of OHS Expert on behalf of Arif Sucipto. The decision is valid for 3 years up to December 4, 2020.
- Binturung Estate
The company shows the Decree of the Head of the Manpower and Transmigration Office of South Kalimantan Province with number 566/442/Was-NKT/2018 dated September 3, 2018 concerning the Approval Letter of Binturung Estate OHS Committee Structure in 2018. Binturung Estate has OHS Expert on behalf of Margono with registration number 14928/PK3/AJ/31/2018/P1. Minister of Manpower Decree of the Republic of Indonesia with number KEP.P. 7834/NAKER-BINWASK3/VIII/2018 concerning Appointment of OHS Expert on behalf of Margono. The decision is valid for 3 years up to August 24, 2021.
- Sesulung Estate
The company shows the Decree of the Head of the Manpower and Transmigration Office of South Kalimantan Province with number 566/396/Was-NKT/2018 dated August 10, 2018 concerning the Approval Letter of Sesulung Estate OHS Committee Structure in 2018. Sesulung Estate has OHS Expert on behalf of Arif Sucipto with registration number 46450/PK3/AJ/31/2017/PO. Minister of Manpower Decree of the Republic of Indonesia with number KEP.10469/NAKER-BINWASK3/XII/2017 concerning Appointment of OHS Expert on behalf of Arif Sucipto. The decision is valid for 3 years up to December 4, 2020.
- Rampa Estate
The company shows the Decree of the Head of the Manpower and Transmigration Office of South Kalimantan Province with number 566/106/Was-NKT/2019 dated February 6, 2019 concerning the Approval Letter of Rampa Estate OHS

Committee Structure in 2019. Rampa Estate has OHS Expert on behalf of Arif Sucipto with registration number 46450/PK3/AJ/31/2017/PO. Minister of Manpower Decree of the Republic of Indonesia with number KEP.10469/NAKER-BINWASK3/XII/2017 concerning Appointment of OHS Expert on behalf of Arif Sucipto. The decision is valid for 3 years up to December 4, 2020.

- Pondok Labu Estate

The company shows the Decree of the Head of the Manpower and Transmigration Office of South Kalimantan Province with number 566.011/P2K3/Naker-2/V/2017 dated May 26, 2017 concerning the Approval Letter of Pondok Labu Estate OHS Committee Structure in 2017. Pondok Labu Estate has OHS Expert on behalf of Ahmad Husaini with registration number 22807/PK3/AJ/31/2018/P1. Minister of Manpower Decree of the Republic of Indonesia with number KEP.P.14107/NAKER-BINWASK3/VIII/2018 concerning Appointment of OHS Expert on behalf of Ahmad Husaini. The decision is valid for 3 years up to August 24, 2021.

Minutes of Guiding Committee of Occupational Safety & Health meetings were held on December 29th (SSE), 4th (BNE) and 13th (PLF) 2018, the materials discussed were among others: inventory of OHS issues, application of OHS norms, OHS inspections, work accident investigations and analyzes, training and counseling, emergency response, job risk analysis in 2018, risk analysis and OHS program preparation in 2019, preparation of National OHS months, and preventive maintenance at several stations at Mill. The meeting of OHS committee has been conducted every month.

4.7.5

Emergency Response

The company has emergency procedures as follows:

1. SOP for emergency response conditions no.: PSA / SOP.PD SOP document dated 1 December 2010 describes the stages to be carried out in the event of an emergency.
2. SOP Number 7302 / PSQM-ESH / 14 07/08/14 approved by Head Plantation Upstream Indonesia concerning Guidelines for Fire Prevention and Management

Based on the results of field visits it is known that the implementation is not in accordance with the SOP, as follows:

- Installation of Fire Extinguisher at Pondok Labu Factory which is not appropriate in some places, for example in Central Warehouse on a pole with 125 cm above and the station loading ramp does not have a symbol of the location of the Fire Extinguisher.
- Hydrant not in standby condition, based on simulations and observations made by the auditor there is no hose in the Hydrant box
- Installation of Fire Extinguisher that is not yet right at the Fuel Filling Station and Warehouse Estate Area (there is no marker on the location of the Fire Extinguisher).
- Fire Extinguisher in non-pressurized conditions and not ready to be used at Daycare Division 2 Binturung Estate.

First Aid Kit

1. The company has a First Aid Accident OHS Procedure and First Aid Kit with the number P3K-01 dated December 1, 2015. In the procedure, a list of drugs is recommended to be brought to the field with a total of 12 items.
2. Evaluation of First Aid Kit PT Paripurna Swakarsa in 2018 by a company doctor, who explained the list of recommended drugs to be brought to the field with a total of 12 items.

Based on the results of field observations found that implementation is not in accordance with the procedure for example:

- There are 2 items in the First Aid Kit which are expired, namely betadine and rivanol in the PLE fire extinguisher.
- First Aid Kit for foreman 1 in Sesulung Estate contains 10 items without a table of contents and monitoring.
- First aid kit without contents on Binturung Estate.
- First Aid Kit at the Binturung Estate division office does not contain up to 12 items (according to the list) and there is no usage monitoring.
- First Aid Kit in the Binturung Estate warehouse office does not have up to 12 items (according to the list) and there is no usage monitoring.

Based on the explanation of the evidence above, it is known that the company has not been able to show evidence that handling emergencies and first aid has been implemented and monitored its effectiveness in accordance with the SOPs that are owned

so that this becomes a non-conformity **NCR No. 2019.09**

4.7.6

The company has registered all of its employees as member of government scheme on health and workforce insurance (*BPJS Ketenagakerjaan* and *BPJS Kesehatan*). Permanent worker daily and/or monthly basis got Insurance on work accident (*JKK*), old age benefit (*JHT*), dead insurance (*JKM*), retirement insurance (*JP*) and health insurance (*JKS*). Meanwhile for piece-worker, the company has only responsible for work accident insurance and dead insurance. However, most of non-permanent workers were family member of permanent workers (as wife). Hence, its health insurance was under their husband. Record of insurance payment for example:

- Employment insurance for December 2018 period of Pondok Labu Factory, Binturung Estate and Rampa Estate has been paid on January 7th 2018. Payment receipt has been verify by auditor.
- Health insurance for January 2019 period of Pondok Labu Factory, Binturung Estate and Rampa Estate has been paid on January 7th 2018. Payment receipt has been verify by auditor.

The company routinely disseminates information to contractors to fulfill social responsibilities to workers related to health and workforce insurance (*BPJS Ketenagakerjaan* and *BPJS Kesehatan*) in accordance with the contents in the Work Agreement (SPK). The meeting was held in December 2018 at the Factory Office, the meeting was attended by representatives of each contractor. During the audit activity the company does not have a copy of the health and workforce insurance payment for all contractor workers, in this case the company has the opportunity to monitor the payment of health and workforce insurance for contractor workers. **OFI**

Based on the results of verification of work accident monitoring documents in 2018 and interviews with employees at mill and estate it is known that in 2018 there are only accidents with minor categories in workplace so that there are no claims for workplace accidents in 2018.

4.7.7

The company has records of work accidents for estate and mill for the period January - December 2018. Records of work accidents use the LTA method. From the results of document verification, it was found that there was 29 work accident with minor category with values of FR 67 and SR 132.

4.7.2	Status: Non-Conformity No. 2018.07 with category Major
4.7.5	Status: Non-Conformity No. 2018.09 with category Minor

4.8

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

4.8.1 and 4.8.2

The company has the following 2019 employee training program:

- Harvesting In House Training.
- Material and Waste Management Training.
- Integrated Pest and Management Training.
- Fertilization Training.
- Spraying Training.
- Material Safety Data Sheet Training.
- Emergency Response Preparedness Training.
- Risk Management Training.
- HCV training.
- SSCS Training.

During the audit activity, the company shows the document on the realization of employee training conducted in 2018 as follows:

- HIRAC socialization was held on August 26, 2018 to SSE Division 3 employees at the SSE Division 3 Office Yard. During the audit activities, documentation, attendance lists and socialization material can be shown.
- OHS and First Aid Training socialization held on 29 September 2018 to SSE Division 1 employees took place in SSE Division 1 Office Yard. During the audit activities, documentation, attendance lists and socialization material can be shown.
- Harvesting Training held on November 23, 2018 to RPE Division 1 employees located in RPE Division 1 Office Yard. During

the audit activities, documentation, attendance lists and socialization material can be shown.

- The Integrated Pest Control Training held on November 13, 2018 to BNE Division 2 employees took place in BNE Division 2 of the Office Yard. During the audit activities, documentation, attendance lists and socialization material can be shown.
- Fertilization Training held on May 16, 2018 to BNE Division 3 employees located in BNE Division 3 of the Office Yard. During the audit activities, documentation, attendance lists and socialization material can be shown.
- OHS and Environmental Dissemination held on January 15, 2018 to factory operational employees at the Yard Factory Office. During the audit activities, documentation, attendance lists and socialization material can be shown.

Based on document verification it is known that the company uses a contractor (PT BAL) for replanting activities. when the audit activity takes place, the company shows the training documents provided to contractor employees as follows:

- Socialization of land clearing without burning was held on March 1, 2018 to PT BAL employees at the RPE Division 3 Office Yard. During the audit activities, documentation, attendance lists and socialization material can be shown.
- OHS and First Aid Training socialization held on March 26, 2018 to PT BAL employees took place in RPE Division 1 Office Yard. During the audit activities, documentation, attendance lists and socialization material can be shown.
- HIRAC socialization was held on March 12, 2018 to PT BAL employees at the RPE Division 3 Office Yard. During the audit activities, documentation, attendance lists and socialization material can be shown.

Based on field observations and interviews with mill and estate employees known that each employee has been given regular training in accordance with their duties and responsibilities, this is evidenced by the explanation of the harvester can explain the criteria for fresh fruit bunches, cutting and arranging fronds, preparation of FFB at the fruit collecting point. While for mill employees in the engine room section can explain monitoring and checking tools and functions of generators and turbines, employees can also explain the time of use between turbines and generators.

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

There are no changes to environmental documents. The Company had environmental documents:

- Environmental Impact Assessment document (EIA) of Oil Palm Plantations and Plantations on behalf of PT. INDOAGRI INTIPLANTATION (PT Laguna Mandiri, PT Langgeng Muara Makmur, PT Paripurna Swakarsa and PT Swadaya Andika) Year 1994. The scope of acreage for PT. Paripurna Swakarsa plenary of 22,800 Ha (Survey Result of Land Inspection B No. 04 / RIS-HGU / 1991 dated August 21, 1991) with the capacity of oil palm processing factory installed 60 tons of FFB / hr.
- Environment Management Plan, Environment Monitoring Plan Oil Palm Plantation and Palm Oil Factory PT. Paripurna Swakarsa North Pamukan and Pamukan Selatan, Kab. Kotabaru, Kalimantan Selatan 1994

5.1.2 & 5.1.3

Based on the report on the implementation of the second semester of RKL-RPL in 2018, the company has conducted environmental management with aspects that are managed and monitored, including:

1. Air quality (emissions, ambient, noise, vibration and odor)
2. Physical and Chemical Properties of Soil
3. The rate of erosion and sedimentation
4. Flood Hazard Potential (including water management)
5. Physical and Chemical Quality of Water (including liquid waste, solid waste and B3 waste)
6. Vegetation and Wildlife (including HCVs, Fire potential)
7. Absorption of Labor
8. Increased Income and Employees
9. Farming Patterns (KKPA Sungai Cengal Area)

The results of field observations and document verification, known that the company has carried out environmental management activities, such as:

- Suppress erosion by maintaining cover crop vegetation, creating a terrace to reduce surface water runoff.
- Absorb local worker
- Management of potential flood-prone areas by making water gates and dikes on low land.
- Etc.

The company has also monitored environmental impacts in accordance with the RKL-RPL matrix. The results of monitoring and evaluation have been explained in the RKL-RPL document. Based on document verification and field observation, known that the company has carried out an environmental management and monitoring plan as an operational impact of the company. The management and monitoring activities have also been explained in the RKL-RPL report submitted every semester to the relevant agencies.

On ASA 1.1, there was an minor NCR regarding to the EIA implementation report 9NCR No.: 2018.10), auditor has verified the evidence on ASA 1.2:

The company has revised the 2nd semester RKL-RPL Implementation Document in 2018, which has monitored and contained the type of impact in accordance with the RKL-RPL matrix owned. Also attached are supporting documents such as the results of testing and social impact monitoring questionnaires. **The evidences had been verified and accepted to be closed out and complied.**

Company has the opportunity to ensure the preparation of RKL-RPL documents in accordance with Minister of Environment Decree no. 45 of 2005 (OFI)

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, 5.2.2

The company has identified the HCV within the plantation area, carried out in 2009, assessed by *Yayasan Kelapa Sawit Berkelanjutan Indonesia* (YASBI). The assessment are conducted by the appropriate assessor and using the relevant HCV toolkit.

Based on this identification, in the operational area of PT. PSA was identified as HCV area of 734.63 ha. The company carried out HCV rearrangement in 2015 due to uncertainty between the HCV area and HCV potential in the identification report document, based on the rearrangement, the definitive HVC area was 396.51 Ha, consisting of HCV 1.4, HCV 1.1, HCV 1.3, and HCV 3.

Explained in the HCV assessment report, in the company's operational area was identified the protected flora and fauna by IUCN and PP No. 7 of 1999 namely 10 types of mammals (*Nycticebus coucang*, *Manis javanica*, *Nasalis larvatus*, *Hystrix brachyura*, *Mydaus javanensis*, *Aonyx cinerea*, *Felis bengalensis*, *Tragulus javanensis*, *Tragulus javanensis*, *Cervur unicolor*, and *Muntiacus muntjak*). There are 5 protected bird species namely *Pelargopsis capensis*, *Anthracoseros albirostris*, *Rhipidura javanica*, *Aethopyga siparaja*, and *Arachnothera longirostra*. 2 types of protected reptiles namely: *Varanus boorneensis* and *Crocodylus spp.*

The company has compiled plans for the management of HCV areas and RTE species (rare, threatened, endangered) for the 2018-2019 period, one of which is the installation of HCV signboards, installation of ban and warning signboards and installation of signboards for protected species.

During field observations to the HCV area in PLE (riparian are of Pondok Labu river and Separe river), to the HCV area at BNE (the Binturung River Basin, Sopan Tempuro spring water, Niko spring water) and to the swamp area in RPE, it was seen that there is no installed the HCV signboards, and ban / warning signboards for HCV area. In addition, based on field observations to the HCV area in Niko spring water there are traces of chemicals spraying that cross the buffer zone border.

Based on these explanation, the company not yet conduct the management of HCV in accordance with the management plan specified. **NCR No.: 2019.10**

5.2.3, 5.2.4, 5.2.5

The company has a flora and fauna protection policy signed by Head Plantation Upstream Indonesia in December 2011. Socialization has been carried out to employees, there is evidence of minute of socialization for the 2018 period, for example at SSE Division III on August 6, 2018 and PLE employees are carried out on March 15, 2018. During interview to workers, they can explain related to sanctions if they are known to disturb and hunt protected species. Observed in workers line-site in SSE and BTE, there were employees who reared the fauna categorized as least concern on CITES (appendix II), in this case the company considered to improve monitoring and workers understanding towards the protection of flora and fauna in the company's operations not limited to the type of RTE / protected only. **OFI**

Review of HCV and RTE management plan are done in yearly basis, the latest was conducted in 2018, based on the review result, no changes to the HCV management plan except related to the improving the HCV training and socialization. There are no additions of RTE species since ASA 1.1 to ASA 1.2.

There is no HCV set-asides, the entire HCV area are within the company's HGU, PT PSA has a map of HCV identification contained in the HCV document. Based on the results of the public consultation there were no indications of conflict with the community rights in the HCV area.

5.2.2	Status: Non-Conformity No. 2019.10 with Major 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

The entire products of waste and it sources have been identified and documented in the identification list document of Environmental Aspects on 2017. The examples of waste products are oil sourced from FFB trucks, emissions/smoke from FFB trucks/CPO, waste sourced from used sacks, emissions/smoke that comes from generators, emissions/smoke coming from the chimney boiler, emissions/smoke coming from EFB fireplace, spilled lubricant /oil sourced from the generator engine, oil drums sourced from the workshop, ex-battery, ex-dust cloth/used lamp sourced from materials warehouse, chemical ex-container from chemical warehouse, effluent that sourced from the chemical ex-bottles derived from laboratory, effluent that comes from FFB processing, and others.

5.3.2

The company has the SOP for toxic/hazardous waste and non –toxic/hazardous management with the number PLB3 & BB3 dated March 4, 2009. In the procedure, it is explained that the storage of toxic/hazardous waste refers to the applicable legal requirements, including packaging requirements, storage procedures, building requirements, and the requirements for submitting Toxic and Hazardous Waste to third parties. Based on the results of field observations in the plantations and factories, it was found that the implementation of Toxic and Hazardous Waste management was not yet suitable, for example:

- Ex oil drums used as a rainwater reservoir on the WWTP area.
- Ex oil drums, used oil, and generator filters are placed behind the PLF Engine Room.
- Ex pesticide container and ex-oil drum in Pondok Labu Estate Division 4 Housing.
- Ex pesticide container in front of the Sesulung Estate Chemist Warehouse.
- Ex pesticide container in the Sesulung Estate Fuel Warehouse.
- Ex oil drum is used as a water reservoir in the Sesulung Estate Generator Room.
- Ex pesticide container behind the Sesulung Estate Generator Room.
- Ex thinner cans and ex filters in the Rampa Estate Welding Site.
- Contaminated packaging in the Binturung Estate Warehouse.
- Ex oil drum in Contractor Employee Housing at BNE Division 2.
- Ex oil drum in front of the Binturung Estate Generator Room.

Based on the above evidence, the company has not been able to show evidence of the implementation of Toxic and Hazardous Waste Management in accordance with the applicable SOPs and regulations so that this is determined as a non-conformity **NCR No. 2019.11**

5.3.3

The company has documented waste disposal and management plans in the Waste Source Identification document and in the applicable SOPs for example:

1. Spillage and Prevention and Leaks Prevention and Prevention Procedures for B3 / LB3 and number 301 / PSA-KRD-17/11 dated January 2, 2011.
2. Domestic Waste Management Procedure with SOP.DOM number dated October 1, 2013.
3. The SOP for Toxic and Hazardous and Non-Toxic and Hazardous Management with the number PLB3 & BB3 dated March 4, 2009.

However, based on the results of field observations, it was found that the implementation of SOP was not yet appropriate, for example:

- There is overflow in ponds of WWTP No. 1 and 2.
- There is oil spill on the WWTP area.
- Oil spills at workshops and room generators in division 4 of Pondok Labu Estate
- There is oil spill in the generator room, and welding site of Rampa Estate.
- Domestic landfill in front of the division 4 housing area of Pondok Labu Estate which is not well managed.
- Domestic waste is piled up in front of housing in Sesulung Estate.
- Waste is scattered and burned in the Binturung Estate housing estate.

Based on the above evidence, the company has not been able to show evidence of the implementation of Waste Management in accordance with the applicable SOPs and regulations so that this is determined as a non-conformity **NCR No. 2019.12**

5.3.2	Status: Non-Conformity No. 2018.11 with Major category
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5.3.3	Status: Non-Conformity No. 2018.12 with minor category
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5.4 Efficiency of fossil fuel use and the use of renewable energy is optimised.

5.4.1
Reduction of fossil fuels has been developed and applied by the Pumpkin Cottage Factory with renewable use (fiber and skin) to drive the Steam Turbine as a whole is still quite effective. Based on the verification of fiber, shell and fossil fuel use documents in 2018 it was found that the average fiber usage was 7.98 Kg / KWH and shell 0.28 KWH / ton CPO while fossil fuel use was 239,805 liters from the 2018 usage budget of 303,595 liters which means that there is an efficient use of fossil fuels as much as 63,790 liters in 2018. Based on records of fossil fuel use from 2016 to 2018, there appears to be a decline from year to year.

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

5.5.1 and 5.5.2
CH policy on zero burning during land clearing were presented in document of procedure No. 2xx/PTK-LPG/2004 Index No. II/04 dated December 1st2004 and Head Plantation Memorandum letter No. POD-UM-015/IV/2013 dated April 12th 2013. There is also memorandum of Head Plantation Operation No. POD-UM-044/III/2010 dated March 9 2010 of replanting program for year of 2010-2030 of no burning activity. And Manual Agronomy Reference No.110/EST-ARM section 4 of land preparation, clause 3.1 b stated that land clearing have to follow Letter of Plantation Director No.KB.110/SK/DJ BUN/05.95 dated May 30 1995.

Furthermore, based on document letter of agreement for replanting activity with land clearing Contractor in both estates, it was mentioned that land clearing should be carried out by using excavator and bulldozer with no burning method. This is confirmed during field visit to replanting areas in Rampa Estate. Burning activity is also not allowed for pest control during land preparation on replanting.

Based on interviews with employees it is known that the company always provides information on the prohibition of land clearing by burning to employees. Further explained by the employee that the socialization was given at the morning briefing in the estate office before leaving for work.

	Status: Comply
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5.6

Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.
5.6.1, 5.6.2

PT PSA has identified the entire of pollution and emission source from plantation and processing activity, can be shown the document of identification result which informs: type of emissions, sources, mitigation and management plan. Based of document it was shown that the type of emission generated by PT PSA is CO₂, NO₂, CH₄ and H₂S.

The mitigation plan that has been set by the company:

- Implementing the zero burning policy in entire operation area (land preparation), it was seen during field visit to RPE in field of K015, K014, K013, J017 and to BNE in field of F06, F07, F08, the land preparation for replanting are done in mechanization system.
- Conducting the preventive maintenance of machinery and vehicle in weekly and monthly basis and monitoring the use of diesel fuel.
- Reducing the use of urea for fertilizing activity by utilizing the solid waste to improve the soil nutrient.
- Conduct the wastewater treatment at WWTP to reduce BOD before discharge to land application, and routinely conduct the laboratory test.

The company has conducted noise testing in workplaces in mill, the latest held in January 2019, the result shown that noise level in boiler station 89.5 dBA, in Engine room 100 dBA, in Nut kernel 94.3 dBA, in Press station 91.4 dBA and in Clarification station 85.4 dBA.

Based on field observation, observed that the company had installed warning signs for the use of PPE ear muff / ear plugs in strategic locations including noise level information on these stations. The audiometry test also conducted routinely, the latest are done in Jan 2019. No found any of hearing loss based the latest test result.

5.6.3

PT PSA has calculated the GHG emissions generated using the RSPO calculator version 3.0.1, with option 1 - apply full version, result of calculation informs GHG emissions per product of CPO and PK, detailed in the following table:

Summary of net GHG emissions from PalmGHG calculator:

Product	tCO2e/t Product		
CPO	3.54		
PK	3.54		
Description		Unit	Value
Total Planted Area		Ha	14699.1
Total Planted Area on Peat		Ha	0
Conservation Area		Ha	258.55
OER		%	19.99
KER		%	4.86

Mill emissions and credits:

Description	tCO ₂	tCO ₂ e/t FFB
Emissions Sources		
POME	44719.99	0.2
Fuel Consumption	1166.99	0.01
Grid Electricity Utilization	0	0
Credits		
Export of Excess Electricity to Housing & Grid	0	0

Sale Of PKS	0	0
Sale Of EFB	0	0
Total	45886.98	0.21

Plantation / field emissions and sinks:

Description	Own			Group			Third party		
	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e/t FFB	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e/t FFB	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e/t FFB
Emission Source									
Land Conversion	242915.91	16.53	1.09	0	0	0	0	0	0
CO ₂ Emissions from Fertilizer	31100.64	2.12	0.14	0	0	0	0	0	0
N ₂ O Emissions	8958.71	0.61	0.04	0	0	0	0	0	0
Fuel Consumption	7085.89	0.48	0.03	0	0	0	0	0	0
Peat Oxidation	0	0	0	0	0	0	0	0	0
Sinks									
Crop Sequestration	-137609.05	-9.36	-0.62	0	0	0	0	0	0
Sequestration in Conservation Area	-2370.91	-0.16	-0.01	0	0	0	0	0	0
Total	150081.19	10.21	0.67	0	0	0	0	0	0

Emissions from palm kernel crusher:

Emission Source	tCO ₂ e
PK from own mill	38322.7
PK from other sources	0
Fuel consumption	0
Total crusher emissions	0

Palm oil Mill Effluent (POME) Treatment

Divert to compost	0.00 %
Divert to anaerobic digestion	100.00 %

POME Diverted to Anaerobic Digestion

Divert to anaerobic pond	100.00 %
Divert to methane capture (flaring)	0.00 %
Divert to methane capture (electricity generation)	0.00 %

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, 6.1.2

There is no changes to SIA documents. The company has conducted Social Impact Assessments (SIA) on Nov 2009. It assessment gathering all social information from internal stakeholder (workers), external stakeholder (local communities, customary leader, smallholder, village authority) on December 6, 2009. This document has covered all positive and negative social effects that caused and maybe caused by the plantations and mill. Records of participation from local communities and

stakeholders during SIA are available.

Company has also conducted a social impact assessment due to replanting activities conducted in 2015. This document has covered all positive and negative social effects that caused and maybe caused by the replanting activities. Based on interview with communities' shows that all issue has been identified by CH.

6.1.3 ; 6.1.4

The company has a Social Impact Management Plan contained in the evaluation document for the Management and Monitoring of Community Social Impacts in 2019, which has management time with the implementation period January - December 2019 with the target of the Village around PT PSA. The social impact management plan includes:

1. Health Services
2. Education
3. Community assistance.
4. Empowering communities around the plantation
5. Development of village infrastructure

Company has been showed several examples of social impact management plans that have been implemented.

The company showed evidence of social impact evaluation conducted in participatory manner in September 2018 in the form of a questionnaire totaling 9 questionnaires. The results of interviews with management, conveyed that participants came from the community. The participants came from Pondok Labu (1 person), Rampa (2 people), Sesulung (3 people) and Binturung (3 people). Based on the results of interviews with the Head of Pondok Labu Village, it was stated that the person concerned had not been involved in the evaluation of the social impacts. In addition, there is no evidence that social impact evaluations have involved workers, contractors, Labor Union, gender committees, etc.

Based on the explanation above, it was concluded that there was not enough evidence that the review / review of the management and monitoring of social impacts had involved all affected parties. **NC No. 2018.11.**

6.1.5

Company has had a smallholder partnership with villagers near the company, but the agreement of partnership is under of PT LMR (one group with PT PSA).

6.1.4	Status: Non-Conformity No.2018.11 with minor raised to Major	
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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 , 6.2.2, 6.2.3

Company has been identified the list of local communities affected by the mill and estates operational activities. For example at Mill consist of 80 stakeholders, including villages, government institution, contractor/supplier, and etc. Communication mechanism between the company and communities describes in SOP No.: **PSA/SOP DK** dated 11 April 2011. Explained that the section head and manager are PIC that are responsible for communicating.

Based on the verification of the incoming and outgoing letter documents, it is known that all letters have been responded to by the company. For example: Incoming and outgoing mail (Rampa estate) on February 7, 2019 there was a letter of entry from Rampa Cengal Village regarding a request for road repairs. Response to the letter dated 9 February 2019 with no. 03 / RPE / village assistance / II / 2019 / s. The results of interviews with surrounding villages and agency (Mabor Agency) known that the company had conducted SOP socialization. If there are things that they want to communicate / deliver, they can contact / submit them to the section head or manager.

	Status: Comply	
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6.3
There is a mutually agreed and documented system for dealing with complaints and grievances, which is Implemented and accepted by all affected parties.

6.3.1

Complaint management mechanism from the stakeholders (including workers and communities) explained in the SOP No. 077/PSA/Stkh/10/15, revision 01 dated 7 October 2015. Based on the SOP, it was explained that:

- All complaints / suggestions / aspirations that go into the operational unit through an assistant, Sr. assistant or head of office

/ KTU & collection of letters entered in the suggestion box / letter available in each unit every 1 week.

- Management guarantees the security and confidentiality of the reporter from the parties
- All complaints from the parties will be documented in the Community Aspiration Records book that is stored in the big office and division
- All answers to complaints / aspirations that will be sent to the parties must be signed by the Operations Unit Manager
- Answers to complaints / aspirations that have received approval no later than 2 weeks (14 days) from the date the letter / complaint is received by the operational unit.

The results of interviews with workers and community around, known that workers and villager already know the mechanism of complaints. In addition, if there are complaints for workers, it can also be submitted to the Labor Union. Company showed examples of recordings of socialization of complaints for example ; socialization record of complaints mechanism at SSE on 1 August 2018 to 16 workers.

6.3.2

Based on the results of observations to the housing in division 2 of Binturung Estate, it was found that workers and housing residents had complained about improvements to housing facilities, but there had been no response or follow up on the complaint. In addition, the Binturung Estate unit only showed complaints for 2019 totaling 5 from division 1, division 3 and workshop and there was no response / follow-up. From 5 complaints, 4 of them have exceeded the deadline of 2 weeks / 14 days.

Based on the explanation above, it was concluded that there was not enough evidence that all workers' complaints had been documented and had been responded in accordance with the Complaints Handling Mechanism SOP for all parties & communities PT PSA No. document 077 / PSA / Stkl / 10/15, revision 01 dated October 7, 2015 which states that all complaints from the parties will be documented in the Aspiration Records book and responded not later than 2 weeks / 14 days. **NC no. 2019.13**

6.3.2 Status: Non-Conformity No.2019.13 with Major Category

6.4

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

6.4.1, 6.4.2, 6.4.3

There is no traditional land and customary land within the company's operational area, auditor has verified the document related such as HGU document, HCV report and document of ANDAL and RKL/RPL. The company's area was a State land that had obtained a reserve permit for an area of $\pm 22,800$ ha. The area also been obtain the permit of forest area release through decree of Minister of Forestry no.: 523 / KPTS-II / 1994 dated November 16, 1994 concerning Permit for the Release of Production Forest Areas for PT. PSA covering an area of 21,744 ha.

The company has a calculation identification procedure and compensation for loss of legal rights and traditional rights, describes in SOP of Land Identification and Compensation Standard (001 / PSD-L & AS) dated June 3, 2011 compiled by PSD, it was referring to land compensation standards issued by Kotabaru Regency Government, there has been no revision of existing procedures. SOP are available in Bahasa.

Based on the HCV document and the results of interviews with the Pondok Labu Village community, it was stated that there were no customary rights in the company's operational area.

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

Minimum wage based on the Decree of Kalimantan Selatan Governor Number 188.44/0598/KUM/2018 dated November 19, 2018 in term of Minimum Wage of Kotabaru district for period of 2019 as much as IDR 2.796.819,62. Wages in 2018 have been adjusted since January 1, 2017. Based on document verification, field observation, interview with workers (manuring workers, harvester, spraying team, mill workers) there's no indication about the force labour. In addition They get the wage suitable with the wage minimum regulation. Interview with Labor Union, said that wages and overtime paid are in accordance with applicable regulations.

Distribution of salary slips to workers which inform details of wages (OFI)

6.5.2

Work agreement (contract) between worker and company describes about type of work and salary, duty and responsibility, work hour, health and medical, work termination, and others. Contract is written in Indonesian Language and workers are understood the substance of the contract. For example ; contract No. 001/PSA-RPE-DIV.III/PK-PKWT/XII/2018. In the contract has ben describes about rights and obligations of workers.

Company also has collective labor agreement (PKB) between company and labor union for period year 2016 – 2018 which is endorsed by Manpower and Transmigration Agency in Kotabaru District. The collective labor agreement is regulated about company and worker responsibilities, recruitment process, promotion and demotion, work time management, payment system, social insurance, contract termination, and so on.

6.5.3

Observations on housing and interviews with workers and residents of housing, known that the company has provided housing facilities, worship facilities, sports, daycare, and education. Observations show that the houses provided by the company consist of semi-permanent and permanent houses. For clean water sources, there are WTP provided for housing (factory and Rampa) while for Sesulung, Binturung and Pondok Labu are delivered from water sources from reservoirs or well. The company also provides / allows plantation employees to collect drinking water that has been processed in the factory WTP. For electricity sourced from generators. The company also provides health facilities in the form of polyclinics in each estate that provide first aid facility.

Observation result of the housing division 2 of Binturung Estate known that many damaged houses, especially bathrooms / toilets / kitchens, many households trenches had clogged and non-flowing conditions, septic tank of the division II office was damaged with water from the septic tank inundated.

Related to this, the company has not been able to show evidence of providing adequate and healthy housing facilities for employees. **NC No. 2019.14**

6.5.4

The results of interviews with housing residents such as Sesulung, Binturung, and Pondok Labu are known that there are mobile traders who sell basic necessities that enter the residential area at least twice a day. In addition, there are also stalls in residential areas that sell daily necessities.

6.5.3 Status: Non-Conformity No.2019.14 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

Management of PT PSA has a policy that respects the rights of all employees to form and join a community of Labor Union which is contained in the Collective Labor Agreement and SOP of Guidelines for Management of Sustainable Plantation No. Policy 724 / TQEM-SPMS / 09 dated 27/08/2010. The result of the policy is formation of Labor Unions in PT PSA which is recorded in manpower Agency and still active until the assessment of surveillance 1.2. The policy is available in Bahasa.

Based on interview with the committee of workers, there was no force for the worker to join the labor union.

Minor 6.6.2

There are meeting record between Labor Union and Management unit and also meeting record between Labour union and its member, such as:

- Minutes of meeting on December 28, 2018.
- Minutes of meeting on March 12, 2018, which was attended by 22 participants.
- Minutes of meeting on February, 15 2018.
- Minutes of meeting on January 28, 2018, which was attended by 34 participants.

Based on document verification and interview with internal stakeholders, auditor conclude that the company has implemented policy that respects the rights of all employees to form and join a community of Labor Unions.

Status: Comply

6.7

Children are not employed or exploited.

6.7.1

There is a policy related to personnel's age requirement. The minimum age requirement contained in policy no. Policy 724/TQEM-SPMS/09 which is approved by CEO on April 1 2010.

Based on interview with worker union and gender committee, there was no personnel under 18 years old during the hiring. Based on interview, personnel should attached their national identity card in order to ensure that candidate was more than 18 years old. Furthermore, company will verify candidate's national identity card. Based on document verification and field visit known that workers were informed of the policy on minimum age policy to work in accordance with the provisions. And based on the field visit, there is no indication the use of child.

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

Company has SOP of Sustainable Plantation Management Guidelines No 724/TQEM-SPMS/09 dated 27th August 2010. In the SOP stated that the company is giving same opportunity to all worker. All Staff / Employees should be treated fairly and fairly in matters relating to recruitment, progress, conditions and job descriptions, irrespective of race, degree, ethnicity, gender, color, imperfection (defect), sexual orientation, Organizational membership, political views, religion and age. Based on field observation and interview with female worker in day care, it is known that there is no issue or complain from worker regarding discrimination. The workers that has been interviewed is came from various social origin, race, and religion.

The SOP has been socialized to employees in every muster morning and has been displayed in each office of mill and estates. Based on interview with internal and external stakeholders, there is no discrimination against gender, ethnicity or certain groups. The result of document verification and interview with labor union it is known that workers come from various ethnics, such as local communities, NTT, Java, Sulawesi, and others.

6.8.3

Company kept the personal file of each worker in HRM Department. Based on interview with management, the recruitment is conducted through the company requirement. Worker promotion, mutation or demotion is done through the employee performance assessment. Company has provide the assessment documents, promotions and the employee appointments. For example :Inter Office mail no. 019 / RSP-i2 / VII / 2018 dated July 16, 2018 regarding the increase in Employee Classes of the KSP region in 2018. From the inter office mail, it was stated that 42 employees had been proposed to increase the employee grade. Company also showed the results of evaluations for the employees.

Based on interviews with employees in the field known that workers understand the company policy regarding equal opportunity to get a job without distinction of race, religion and gender.

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

Policies for the protection of female workers are listed in the Gender Policy approved by the Head Plantation Upstream of Indonesia in April 2011. Based on interview with workers, gender committe and labor union, known that policy to prevent all forms of abuse and sexual harassment have been disseminated by company troughout gender committee.

Based on the interviews with female workers in daycare, spraying workers and interviews with gender committee, explained that all of the female workers are obtained leave entitlement to give birth for three months and the right to rest for female workers

who experienced menstruation for 2 days. For example :

- Record of menstruation leave at Sesulung Estate division1 (upkeep worker) on 28-29 January 2019.
- Record of birth leave at Binturung Estate accordance with letter 01/Klinik-BNEI/01/2019/SKH2 dated 12 January 2019.

The company has the opportunity to ensure the socialization of the gender committee. (OFI)

Minor 6.9.3

The company has mechanism to handle complaint which is contained in Complaint management mechanism from the stakeholders (including workers and communities) explained in the SOP No. 077/PSA/Stkl/10/15, revision 01 dated 7 October 2015. Based on the SOP, it was explained that management guarantees the security and confidentiality of the reporter from the parties.

Results of interview with labor unions and gender committees, known that company has special complaint mechanisms through gender committees. If there are complaints related to women's issues submitted through the board of the gender committee. Interviews with female workers are known they understand the specific complaint mechanism through the gender committee. Based on the interviews with the Gender Committee, during 2018 there were no complaints related to the sexual harassment or violence to all employees.

Status: Comply

6.10

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

6.10.1 minor, 6.10.2 major, 6.10.3 minor and 6.10.4 minor

Pondok Labu Factory did not receive FFB from scheme smallholder and out grower, but receive FFB from other company which is in the same group and has been RSPO certified.

Status: Comply

6.11

Growers and millers contribute to local sustainable development wherever appropriate.

6.11.1

The company shows the document on the realization of the CSR program to the community around the plantation in the period of 2018 as follows:

- Construction and operational funding assistance for Junior High Schools in Rampa Cengal Village
- Roads maintenance in Rampa Village, and repairing the road of Sesulung Village
- Purchase rice in the village around the company for the needs of the employees' rice supply.
- Making houses, offices and providing tank profiles for *Babinkamtibnas*
- Giving sacrificial animals during Eid Al-Adha.
- School buses
- Another contribution to religious celebrations
- Teacher allowance
- Etc

Based on stakeholder interviews with surrounding village known that the main necessity from villagers is road access. The company has assisted by providing heavy equipment to maintain the roads.

6.11.2

CH has no KKPA scheme but company obtained another source of FFB from KKPA Sungai Cengal. KKPA Sungai Cengal is under of management of PT LMR Subsidiary of Sime Darby plantation.

Status: Comply

6.12

No forms of forced or trafficked labour are used.

6.12.1; 6.12.2 & 6.12.3

Based on review on the list of personnel's document of PT PSA, known that there was no illegal personnel. The entire personnel have their position based on the signed work contract. Interview with labor union revealed that there is no force or illegal labor who work in company. The entire personnel had read their work agreement and they have signed their work agreement. Moreover, company does not hire illegal or force labor or contract substitution.

Based on field visit in factory and field visit, there was no indication the use of illegal or forced labor. And based on the field visit, there is no indication the use of child labor and no harvesters accompanied by wife or children (force to work).

Status: Comply

6.13

Growers and millers respect human rights

The Human Rights Policy (HAM) made in June 2015 was approved by the Chair of the SOU. In human rights policy, it was explained that PT. PSA incorporated in Minamas Plantation Group is committed to protecting human rights all staff and employees and employees include: Right to life, family rights and continuing descent, rights to develop themselves, rights to justice, rights to personal freedom, rights to security, rights for welfare, rights to participate in government, women's rights, children's rights.

The policy has been regularly socialized to both employees and contractors who partner with companies, for example: socialization at Binturung Estate on November 13, 2018; socialization at the Rampa Estate on November 22, 2018; socialization at Sesulung Estate on June 1, 2018; socialization at Pondok Labu Estate on January 16, 2018 and socialization at Pondok Labu Factory on January 20, 2018.

The results of interviews with employees (estate and factories), trade unions, gender committees and the surrounding community are known that until now there have been no incidents of human rights violations in the company's operational areas.

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; 7.1.2; 7.1.3

Until surveillance 1.2 and based on areal statement, there was no new development or new planting carried out by PT Paripurna Swakarsa. The youngest year of planting is 2018 which is replanting. Environment analysis document, environmental management and monitoring that has been done by the company can be seen in **Criteria 5.1**

Status: Comply

7.2

Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.

7.2.1 major and 7.2.2 minor

Unit certification is not doing land clearing in new areas, simply engaged in replanting.

Status: Comply

7.3

New plantings since November 2005, have not replaced primary forest or any area required to maintain or enhance one or more High Conservation Values.

7.3.1, 7.3.2

There was no planting after 2010, there was no plan of new expansion and new planting by PT PSA. PT PSA has conducted HCV assessments by YASBI in 2008.

Sime Darby Plantation (SDP) has sent a disclosure to RSPO on 15 July 2015 related to reports on land clearing without HCV since Nov 2005 for all units under SDP. Based on these data it is known that there is land clearing since Nov 2005 at PT PSA with a period:

- Nov 2005 – Nov 2007 : 1,138 Ha

- Dec 2007 – Dec 2009 : 508.02 Ha

The company has sent a Land Use Change Analysis (LUCA) document to RSPO on September 4, 2015. Based on LUCA data sent by SDP, it is known that raw liability is 508.02 Ha and final liability is 0 ha.

On June 26, 2016, SDP sent a letter to RSPO regarding raw liability data updates for LUCA, with details as follows:

Estate	Raw Liability (Ha)	
	Nov 2005 – Nov 2007	Dec 2007 – Dec 2009
Binturung	40 Ha	50 Ha
Pondok Labu	-	32 Ha
Rampa	521 Ha	277 Ha
Sesulung	519 Ha	75 Ha

In ASA 1.2, the company can show the document of Chronology of LUCA submission by SDP updated until Jan 2019, where the company has sent LUCA reports to RSPO (19 reports) and shape files in August 2018, in October RSPO responded with statement "require clarification". Based on PT MAL's communication with the RSPO on February 13, 2019, the RSPO stated that currently the LUCA status for PT PSA is still awaiting finalization and clarification from SDP.

Based on the above explanation, the company has not been able to show that the RaCP process for PT PSA has been completed and has received approval from the RSPO. Its note as **NCR No.:2019.15**

7.3.1 Status: Nonconformity No. 2019.15 with Major category

7.4

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

7.4.1 minor & 7.4.2 major

Unit certification is not doing land clearing in new areas, simply engaged in replanting.

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.

Unit certification is not doing land clearing in new areas, simply engaged in replanting.

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.

There has been no new development and no new planting by PT PSA since ASA 1.1.

There is no traditional land and customary land within the company's operational area, auditor has verified the document related such as HGU document, HCV report and document of ANDAL and RKL/RPL. The company's area was a State land that had obtained a reserve permit for an area of $\pm 22,800$ ha. The area also been obtain the permit of forest area release through decree of Minister of Forestry no.: 523 / KPTS-II / 1994 dated November 16, 1994 concerning Permit for the Release of Production Forest Areas for PT. PSA covering an area of 21,744 ha.

The company has a calculation identification procedure and compensation for loss of legal rights and traditional rights, describes in SOP of Land Identification and Compensation Standard (001 / PSD-L & AS) dated June 3, 2011 compiled by PSD, it was referring to land compensation standards issued by Kotabaru Regency Government, there has been no revision of existing procedures. SOP are available in Bahasa.

Based on the HCV document and the results of interviews with the Pondok Labu Village community, it was stated that there were no customary rights in the company's operational area.

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

The company has an SOP on Plantation (as explained in indicator 4.1.1), namely the Agricultural Reference Manual (Document No.110 / EST-ARM / 13), which is authorized on 16th September 2013. The document explains that land preparation (land

preparation) in replanting must be done without burning (zero burning). The results of field observations in the replanting area revealed that there was no indication that replanting activities were carried out by the combustion method.		
	Status: Comply	
7.8 New plantation developments are designed to minimise net greenhouse gas emissions.		
7.8.1 major and 7.8.2 minor Unit certification is not doing land clearing in new areas, simply engaged in replanting.		
	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.		
Best Management Practices aspects In the activity of loading fresh fruit bunches, the certification unit is currently conducting experiments to load fresh fruit bunches mechanically with crane grabber, which was encountered during field observations at Pondok Labu Estate and Binturung Estate. <u>Social Impact</u> CH has compiled a social impact management plan and has demonstrated the implementation of the social impact management plan. <u>OFI</u> Company has the opportunity to ensure that core work is carried out by permanent workers (P & C 2018)		
	Status: Comply	

3.2 Summary of Assessment Report of Supply Chain Requirements

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>The audit area done to palm oil mill which takes legal ownership and physically handling on the whole product. Product transporting and storing are handed to the third parties (bounded contractors) but the entire activities and process are under control of the mill. The agreement which describes the term and condition with the entire contractor are explained in the clause of 5.6 of this Chain of custody summary.</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 audit are done to the palm oil mill which is only sell its product. This requirement are not applicable.</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 mill has been registered as RSPO member and on RSPO IT Platform, as detailed below:</p> <table border="0"> <tr> <td>Sub License ID</td><td>CB73404</td></tr> <tr> <td>Member Name</td><td>Sime Darby Plantation - Pondok Labu POM, PT PSA</td></tr> <tr> <td>Member ID</td><td>RSPO_PO1000000327</td></tr> <tr> <td>RSPO Membership Number</td><td>1-0008-04-000-00 (Sime Darby Plantation Berhad)</td></tr> <tr> <td>Issued On</td><td>15-09-2018</td></tr> <tr> <td>Issued By</td><td>PT Mutuagung Lestari</td></tr> <tr> <td>Start Date</td><td>20-09-2018</td></tr> <tr> <td>End Date</td><td>19-07-2019</td></tr> </table>	Sub License ID	CB73404	Member Name	Sime Darby Plantation - Pondok Labu POM, PT PSA	Member ID	RSPO_PO1000000327	RSPO Membership Number	1-0008-04-000-00 (Sime Darby Plantation Berhad)	Issued On	15-09-2018	Issued By	PT Mutuagung Lestari	Start Date	20-09-2018	End Date	19-07-2019
Sub License ID	CB73404																
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Issued On	15-09-2018																
Issued By	PT Mutuagung Lestari																
Start Date	20-09-2018																
End Date	19-07-2019																
	Status: Comply																
5.1.4	<p>Processing aids do not need to be included within an organization's scope of certification.</p> <p>There are no processing aids in the operational Pondok Labu POM.</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 mill are applied the SC Module D - IP, all the transaction are done in correct supply chain.</p>																

	Status: Comply
5.2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.
	The mill are applied the SC Module D - IP, all the transaction are done in correct supply chain.
	Status: Comply
5.3	Documented procedures
5.3.1	The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified.
	<p>No changes to the procedure since ASA 1.1.</p> <p>The certificate holder has a written procedure to ensure the implementation of all elements of IP supply chain model on Manual RSPO SCCS ref. No. SCCS-Std/RSPO/PSQM/02, Rev 1 dated on 02 January 2018, covering:</p> <ul style="list-style-type: none"> • The implementation of all elements of the supply chain model. • Records and reports that compliance with supply chain model (including training records) • Person having overall responsibility for and author over the implementation of supply chain requirements. <p>Observation are conducted to station of FFB reception and product delivery, as well as interview to the personnel involve, it was seen that all personnel has aware regarding to the SOP of SCCS and was able to demonstrate the SCCS process.</p>
	Status: Comply
5.3.2	The site shall have a written procedure to conduct annual internal audit
	<p>In the procedure of SCCS No. SCCS-Std/RSPO/PSQM/02 clause of 4.2.3 mentioned that internal audit for SCCS are done one a year (two months before external audit), audit conducted by Dept of PSQM.</p> <p>The latest internal audit are done in 7 Jan 2019, there was as much as 7 NCR raised, the action plan has been prepared by the mill, status of NCR are closed.</p>
	Status: Comply
5.4	Purchasing and goods in
5.4.1	The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier
	The mill does not purchase RSPO certified product from outsider, it only sell its own product.
	Status: Comply
5.4.2	The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents
	The mill does not buy products from outsider, however in the SOP of SCCS has been explained that if there are non-conformance on products or documents, verification will be carried out by the mill manager and Marketing Dept in Jakarta Office, if the document or product quality is not suitable it will be returned to the supplier.
	Status: Comply
5.5	Outsourcing activities
5.5.1	In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mill cannot outsource processing activities like refining or crushing.

<p>The mill does not hire refinery and/or crusher facility.</p> <p>The mill outsourced some of its activities to the third parties which is bounded by the agreement. In each agreement has been stated that the third party facilities hired are ready to be visited and inspected by the auditor at any time if needed.</p>	
	Status: Comply
<p>5.5.2</p> <p>Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <ol style="list-style-type: none"> The site has legal ownership of all input material to be included in outsourced processes; The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. 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 	
<p>The mill outsourced some of its activities to the third parties which is bounded by the agreement. The mill shows document of agreement of all contractors hired:</p> <ul style="list-style-type: none"> - Agreement no.: 014/Jasa Penyimpanan/LMR-PSA/VI/2017 dated 30 June 2017, regarding to CPO storage, heating and pumping, between PT PSA and PT LMR (address in Jakarta, Indonesia). In the document written that the PT LMR only do storing, heating and pumping the CPO upon orders from PT PSA, the product legally remains owned by PT PSA - Agreement no.: 015/Jasa Pengangkutan/PSA-ARU/X/2017 between PT PSA and PT Asta Rekayasa Unggul (address in Balikpapan, East Kalimantan, Indonesia), regarding to the palm kernel transportation. The agreement states that the transporter will only deliver to the destination set by the mill. <p>In each agreement has been stated that the third party facilities hired are ready to be visited and inspected by the auditor at any time if needed.</p> <p>During visit to Pondok Labu mill, there is no transport activity for CPO and PK.</p>	
	Status: Comply
<p>5.5.3</p> <p>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.</p>	
<p>The below are contractors of mill, all the information required including names and address has been written in the agreement document:</p> <ul style="list-style-type: none"> - Agreement no.: 014/Jasa Penyimpanan/LMR-PSA/VI/2017 dated 30 June 2017, regarding to CPO storage, heating and pumping, between PT PSA and PT LMR (address in Jakarta, Indonesia). - Agreement no.: 015/Jasa Pengangkutan/PSA-ARU/X/2017 between PT PSA and PT Asta Rekayasa Unggul (address in Balikpapan, East Kalimantan, Indonesia), regarding to the palm kernel transportation. 	
	Status: Comply
<p>5.5.4</p> <p>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</p> <p>There is no new contractors since ASA 1.1</p>	
	Status: Comply
5.6	Sales and goods out
<p>5.6.1</p> <p>The supplying site shall ensure that the following minimum information for RSPO certified products is made available in</p>	

document form: The name and address of the buyer							
<p>Information of CSPO and CSPK buyers required such as name and address of buyer, volume, transporter, loading and unloading date, RSPO certificate and SC Model are listed in the document of contract sales, delivery order and official record of CSPO shipping. During the license period there was three (3) buyer of CSPO and one of CSPK buyer:</p> <ul style="list-style-type: none"> - PT Golden Hope Nusantara, address in Kota Baru, South Kalimantan, RSPO IP, 999.496 MT - PT Musim Mas, address in Medan – North Sumatera, RSPO IP, 1,099.420 MT - PT Berkah Emas Sumber Terang, address in Semarang - Indonesia, RSPO IP, 999.494 MT - PT LMI (KCP), address in Penajam Paser – South Kalimantan – Indonesia, SC Model RSPO IP, volume 2000 MT. 							
	Status: Comply						
5.7	Registration of transactions						
5.7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> • 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 <p>The audit are done to palm oil mill namely Pondok Labu POM, which has been registered as RSPO member and on RSPO IT Platform, as detailed below:</p> <table> <tr> <td>Sub License ID</td><td>CB73404</td></tr> <tr> <td>Member Name</td><td>Sime Darby Plantation - Pondok Labu POM, PT PSA</td></tr> <tr> <td>Member ID</td><td>RSPO_PO1000000327</td></tr> </table> <p>All the product are legally owned by the mill and all physically handling are done by the mill. The mill has been register all its transaction through RSPO IT Platform, confirmation are done upon shipping.</p>	Sub License ID	CB73404	Member Name	Sime Darby Plantation - Pondok Labu POM, PT PSA	Member ID	RSPO_PO1000000327
Sub License ID	CB73404						
Member Name	Sime Darby Plantation - Pondok Labu POM, PT PSA						
Member ID	RSPO_PO1000000327						
	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. <p>Based the SCCS SOP, the mill will announce and reporting the transaction upon the receipt/delivery. During the license there is no CSPO and CSPK sales under other scheme (mill not applied other scheme such as ISCC), and no sales under conventional. During the license the mill has delivered and sell the CSPO product as much as 45,016.48 MT and CSPK 10,517.59 MT. buyer for CSPO i.e PT GHN and PT BEST, buyer for CSPK i.e PT LMI (KCP)</p> <p>All the CSPO and CSPK transaction has been announced through RSPO IT platform, for example:</p> <ul style="list-style-type: none"> - CSPO transaction no.: TR-3f7da74c4185 on 1 Feb 2019, volume : 1,516.27 MT to PT GHN, confirmed as shipping - CSPK transaction no.: TR-3a7e863fed99, volume: 1,788.47 MT, on 4 Dec 2018, to PT LMI (KCP). 						
	Status: Comply						

5.8	Training								
5.8.1	The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff								
	The mill has been set the training plan for SCCS namely once a year, the personnel involve in training is foreman, WB operator, press operator, clarification operator, dispatch operator, production clerk, assistant and Head Adm. of mill. For 2019, planned to be done Feb 2019.								
	Status: Comply								
5.8.2	Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed								
	Sighted the SCCS training report which held in 7 Feb 2019, the report informs the training material, attendances and photo documentation. Based on list attendance seen that the personnel's involved is: Mill Manager, PSQM Staff, WB operator, production clerk and production assistant.								
	Status: Comply								
5.9	Record keeping								
5.9.1	The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements								
	All the records and document related to the SCCS are stored and keeping in the mill office, based on verification it was up-to-date, accurate and accessible. According to the mill SOP, the retention of document is minimum 2 years.								
	Status: Comply								
5.9.2	Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock								
	There is no change since ASA 1.1. Based on a written procedure to ensure the implementation of all elements of IP supply chain model on Manual RSPO SCCS reff. No. SCCS-Std/RSPO/PSQM/02, Rev 1 dated on 02 January 2018, the retention time for financial and transaction records are 10 years and non-financial records are min 2 years.								
	Status: Comply								
5.9.3	The organization shall be able to provide the estimate volume of palm oil / palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.								
	The mill only applied one SC module, namely Module D – IP. The estimate of volume that can be produced for 12 months (during license) is listed in the ASA 1.2 certificate, detailed are describes in the following table:								
	<table> <tr> <th></th><th>Estimation for the next 12 months</th></tr> <tr> <td>FFB</td><td>225,220</td></tr> <tr> <td>CSP0</td><td>47,296</td></tr> <tr> <td>CSPK</td><td>11,261</td></tr> </table>		Estimation for the next 12 months	FFB	225,220	CSP0	47,296	CSPK	11,261
	Estimation for the next 12 months								
FFB	225,220								
CSP0	47,296								
CSPK	11,261								
	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 audit are conducted to palm oil mill which is convert FFB to crude palm oil and palm kernel. The mill has been defined the conversion rate based on FFB, CPO and PK produce on daily basis, for example average of rate of product on Feb 2018 – Jan 2019 namely : <ul style="list-style-type: none"> • OER : 19.60% • KER : 4.78% 	
	Status: Comply
5.10.2 Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	
The mill has been defined the conversion rate based on FFB, CPO and PK produce on daily basis.	
	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.	
The mill are use trademark on the product sales document, the trademark use is option 2 for IP & SG claims label options, it has been in accordance with the RSPO Rules on Market Communications and Claims. The Pondok Labu POM has had a trademark license under Sime Darby Plantation Berhad, number: RSPO-1106024.	
	Status: Comply
5.12	Complaints
5.12.1 The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	
No changes to the complaint mechanism, it has been stipulated in the Manual RSPO SCCS ref.: No. SCCS-Std/RSPO/PSQM/02, Rev 1 dated on 02 January 2018. Up to ASA 1.2 audit, there's no complain on the submitted by buyer to Pondok Labu POM.	
	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	
Based on Manual RSPO SCCS reff. No. SCCS-Std/RSPO/PSQM/02, Rev 1 dated on 02 January 2018, the management review are planned to be done once a year. The latest management review are held in 21 Jan 2019.	
	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. 	
All the input required has been discussed in the latest management review, such as: internal audit result including its NCR status, stakeholder complaint, process and product performance and follow up from the previous 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. 	
The output of the management review on January 21, 2019 has included improvement of the effectiveness of the management system and its processes and resource needs, such as plans to identify personnel who will attend SCCS training, create customer complaint register books and improve communication with marketing related to transaction reporting in palm trace.	
	Status: Comply

3.2.2 (Module D) CPO Mills – Identity Preserved Requirements

Clause	Requirement																
D1	Definition																
D.1.1																	
A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from plantation/ estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Module E is applicable.																	
Pondok labu POM are received and processed FFB only from certified sources (own estate and PT LMR Smallholder Scheme). In this case, the POM will applied RSPO SCC Module D – IP.																	
	Status: Comply																
D.2	Explanation																
D.2.1																	
The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the certification body (CB) in the public summary of the P&C certification report. For an independent mill, the estimated tonnage of CPO and PK products must be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report																	
The estimate of volume that can be produced for 12 months (during license) is listed in the ASA 1.1 certificate, the actual volume since the license issued up to audit of ASA 1.2 has been verified by the auditor, verification are done to the estimate for the next 12 months (next license) as well. The detailed are describes in the following table:																	
	<table><tr><th></th><th>Previous Certificate Claim (tons/year)</th><th>Last year actual certified product (tons/year)</th><th>Estimation for the next 12 months</th></tr><tr><td>FFB</td><td>208,636</td><td>222,525.45</td><td>225,220</td></tr><tr><td>CSPO</td><td>48,900</td><td>45,260.77</td><td>47,296</td></tr><tr><td>CSPK</td><td>12,000</td><td>11,046.30</td><td>11,261</td></tr></table>		Previous Certificate Claim (tons/year)	Last year actual certified product (tons/year)	Estimation for the next 12 months	FFB	208,636	222,525.45	225,220	CSPO	48,900	45,260.77	47,296	CSPK	12,000	11,046.30	11,261
	Previous Certificate Claim (tons/year)	Last year actual certified product (tons/year)	Estimation for the next 12 months														
FFB	208,636	222,525.45	225,220														
CSPO	48,900	45,260.77	47,296														
CSPK	12,000	11,046.30	11,261														
	Status: Comply																
D.2.2																	
The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform).																	
The mill has meet the requirement regarding to the reporting of its supply chain, as it has been registered as RSPO member and on RSPO IT Platform:																	
Sub License ID	CB73404																
Member Name	Sime Darby Plantation - Pondok Labu POM, PT PSA																
Member ID	RSPO_PO1000000327																
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Status	Active																
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	Status: Comply											
D.3	Documented procedures											
D.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</p> <p>a. Complete and up to date procedures covering the implementation of all the elements in these requirements;</p> <p>b. The role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site's procedures for the implementation of this standard.</p>												
<p>Pondok Labu Factory has had procedure for SCCS with IP model in ref no. SCCS-Std/RSPO/PSQM/02 rev01 dated on 02 January 2018 which described the duties and responsibilities of each part; the identification of raw materials and products; and performs supply chain system.</p> <p>For example, Mill Manager are responsible to monitor the implementation of the procedure, department of PSQM are responsible to conduct internal audit for SCCS and the Marketing Dept are responsible to validate the supplier/buyer and reporting/announce all the transaction to RSPO IT Platform.</p> <p>During observation to the WB station it was observed that the PIC has been aware and understood regarding to the SCCS. They can explain the flow of FFB receiving and CSPO/CSPK delivery. All the requirement written in the SOP has been implemented, as observed all the WB tickets has been marked with stamp of "bersertifikat rspo" bot for raw material and product delivered.</p>												
	Status: Comply											
D.3.2												
The site shall have documented procedures for receiving and processing certified FFBs												
<p>The procedure for receiving and processing FFB is explained in the SCCS: SCCS-Std / RSPO / PSQM / 02 SOP re v01 dated on 02 January 2018, explained that verification of FFB received is based on a FFB consignment letter, verification is carried out by security and weighing officers. Pondok Labu POM does not accept FFB from non-certified sources.</p> <p>Based on interviews with weighing operator and security officers, the source of FFB allowed to be received is from 4 estates and associated smallholders that have been certified.</p>												
	Status: Comply											
D.4	Purchasing and goods in											
D.4.1												
The site shall verify and document the tonnage and sources of certified FFBs received.												
<p>The mill has verified all the FFB received for period last year, the mill only received and processed FFB from certified sources:</p> <table border="1"> <thead> <tr> <th rowspan="2">Month</th><th colspan="3">FFB Received (MT)</th></tr> <tr> <th>Own Estate</th><th>Smallholder Scheme</th><th>TOTAL</th></tr> </thead> <tbody> <tr> <td>Feb 2018 to Jan 2019</td><td>222,525.45</td><td>8,458.09</td><td>230,983.54</td></tr> </tbody> </table>		Month	FFB Received (MT)			Own Estate	Smallholder Scheme	TOTAL	Feb 2018 to Jan 2019	222,525.45	8,458.09	230,983.54
Month	FFB Received (MT)											
	Own Estate	Smallholder Scheme	TOTAL									
Feb 2018 to Jan 2019	222,525.45	8,458.09	230,983.54									
	Status: Comply											
D.4.2												
The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.												
<p>Based on verification on production data, it was observed that there is no overproduction for FFB, CSPO and CSPK. The comparison can be seen in the table below:</p> <table border="1"> <thead> <tr> <th></th><th>Previous Certificate Claim (tons/year)</th><th>Last year actual certified product (tons/year)</th></tr> </thead> <tbody> <tr> <td></td><td></td><td></td></tr> </tbody> </table>			Previous Certificate Claim (tons/year)	Last year actual certified product (tons/year)								
	Previous Certificate Claim (tons/year)	Last year actual certified product (tons/year)										

	FFB		208,636	222,525.45						
	CSPO		48,900	45,260.77						
	CSPK		12,000	11,046.30						
	Status: Comply									
D.5	Record keeping									
D.5.1										
The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.										
The mill has record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a monthly basis, for example										
	Month	FFB processed	CSPO Produced	CSPK Produced	CSPO Stock in mill	Delivered to bulking	CSPO stock in bulking	Delivered to buyer	CSPK delivered to KCP	CSPK Stock in mill
					4599.23		5133.59			1189.61
	20 SEP 2018	10726.20	2090.47	498.67	4416.89	2272.81	4899.40	2507.00	264.31	1423.97
	Oct 2018	25829.01	5191.65	1294.15	4088.25	5520.29	4398.77	6020.92	1876.40	841.72
	NOV 2018	22750.19	4358.43	1053.93	4765.72	3680.96	1562.60	6517.13	1741.37	154.29
	Dec 2018	16467.48	3159.37	719.52	2345.94	5579.15	424.61	6717.14	770.61	103.20
	JAN 2018	14537.80	2958.65	724.96	777.95	4526.64	1195.68	3755.57	72.18	755.98
	11 FEB 2018	4235.83	841.93	208.28	678.90	940.98	1132.71	1003.95	364.00	600.26
	Total	94546.52	18600.50	4499.52		22520.83		26521.71	5088.87	
	Status: Comply									
D.6	Processing									
D.6.1										
The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm product including during transport and storage to strive for 100% separation.										
The mill has assure and verify that all certified product are 100% separated since FFB receiving, processing, transporting to bulking and storing in bulking.										
Observation to Mill, interview with personnel in WB station and document verification known that there is no FFB received from non-certified sources.										
Observation to bulking, known that the storage for PT PSA are specified in storage no.: 3 and 4.										
	Status: Comply									

3.3 Conformity Checklist of Certificate and Logo Use

1.	Evidence of permission or approval certificate and logo from Certification Body which submitted by Client	X or√
ASA 1.2	The company does not use RSPO logo. The Pondok Labu POM has had a trademark license under Sime Darby Plantation Berhad, number: RSPO-1106024	√
2.	Implementation of certificate and logo used by Client comply with size and type (shape) against Guideline of Logo Use	X or√
ASA 1.2	The company does not use RSPO logo. The Pondok Labu POM has had a trademark license under Sime Darby Plantation Berhad, number: RSPO-1106024	√
3.	Implementation of Certificate and Logo is not used on product	X or√
ASA 1.2	The company does not use RSPO logo. The Pondok Labu POM has had a trademark license under Sime Darby Plantation Berhad, number: RSPO-1106024	√
4.	Controlling of Certificate and Logo, including withdrawing inappropriate logo.	X or√
ASA 1.2	The company does not use RSPO logo. The Pondok Labu POM has had a trademark license under Sime Darby Plantation Berhad, number: RSPO-1106024	√

3.4 Summary of RSPO Partial Certification

Compliance of the uncertified management units of Sime Darby Plantation Bhd against the rules for partial certification was determined through Self-Assessment in accordance with RSPO Certification System clause 4.2.4. A summary of findings is as stated below:

Sime Darby Plantation Bhd Time Bound Plan is explained in table section 1.10. Sime Darby has achieved 34 management units in Malaysia and 24 Management Units in Indonesia that RSPO certified. Total management unit in Sime Darby Plantation Bhd are 34 in Malaysia, 25 in Indonesia and 1 in Liberia. Sime Darby Plantation Bhd has informed the Time Bound Plan progress through representative's office in Indonesia. MUTU has considered that Sime Darby Plantation Bhd is comply with the RSPO requirement for Time Bound Plan. The Time Bound Plan was revised and declared by the Sime Darby Plantation Bhd Indonesian representative on January 2019 by the Head of PSQM.

MUTU has verified partial certification for un-certified unit's subsidiary of Sime Darby Plantation Bhd based on their Time Bound Plan. MUTU Auditor verified positive assurance against the company internal audit and supporting evidence as well as any information from others sources.

MUTU Auditor has verified company partial certification and concludes that:

- There are significant land conflicts in PT Mitra Austral Sejahtera, there is still an issue that remains unresolved social i.e. from *Serikat Petani Kelapa Sawit* (SPKS), but improvements are ongoing.
- PT Budidaya Agro Lestari waiting for land title process to some of its operational area.
- PT Guthrie Peconina Indonesia – Sungai Jernih Estate currently is in HGU process
- The company has follow RSPO requirement related to New Planting Procedure and Remediation and Compensation Procedure.
- There is no labor 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.

3.4.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.2.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p>Company Group/Holding Statement: Companies are already doing internal audits. There are internal audit reports for each company, latest partial internal audit are held in July – December 2018, for five units and three smallholder scheme.</p> <p>Auditor Verification: Internal Audit report available for uncertified management unit, latest partial internal audit are held in July – December 2018, for five units and three smallholder scheme.</p> <ul style="list-style-type: none"> - PT Mitra Austral Sejahtera : 2 December 2018 - PT Budidaya Agro Lestari : 2 April 2018 - PT Guthrie Peconina Indonesia – Sungai Jernih Estate : 8 aug 2018 - PT Sandika Natapalma – Karya Palma Estate : 10 July 2018
i.	<p>No replacement after dates defined in NIs Criterion 7.3 of:</p> <ul style="list-style-type: none"> • Primary forest. • Any area identified as containing High Conservation Values (HCVs). • Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3. 	<p>Company Group/Holding Statement: HCV assessment has been conducted for uncertified units i.e. PT Mitra Austral Sejahtera (by Aksenta in March 2009) and Sime Darby Plantation Liberia operations (by RSPO approved assessors – Dr SK Yap in 2011).</p> <p>Auditor Verification:</p>

		<p>Sime Darby Plantation Bhd sent disclosure of liability including LUCA analysis to RSPO Secretariat on 2 December 2014 and 2nd revision on 24 June 2016. Current status of LUCA report of SDP Bhd is has been sent the 19 report of LUCA to RSPO on Aug 2018, responded by RSPO with need clarification. The companies ensuring reporting of disclosure of liability progress to RSPO and according to the CB's correspondence with RSPO Remediation and Compensation.</p>
i.	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>Company Group/Holding Statement: A new mill will be set up in Liberia and planned for commissioning in February 2016. Preparation to undergo the RSPO Certification process is in progress and SDP targets to undergo RSPO Certification by end 2017. RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps is in progress. *Note: RSPO NPP Announcements for SDP can be found at http://www.rspo.org/certification/new-planting-procedures/public-consultations/page/14</p> <p>Auditor Verification:</p> <ul style="list-style-type: none"> • Karya Palma Estate (PT Sandika Natapalma) and Baturus Estate (PT Budidaya Agro Lestari) any new planting after January 1st 2010 and due to not conduct NPP. • RSPO NPP process has been completed in 2011 for a new mill in Liberia.
ii.	Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	<p>Company Group/Holding Statement: Sime Darby (Liberia) Plantation Inc. Status: Box G - Close for Monitoring Further details please refer to: http://www.rspo.org/members/complaints/status-of-complaints/view/46 PT Mitra Austral Sejahtera (Sime Darby Sdn Bhd) Further details please refer to: http://www.rspo.org/members/complaints/status-of-complaints/view/29</p> <p>Auditor Verification: Auditor has verified the supporting evidence of above the company statement. There are land conflict in :</p> <ul style="list-style-type: none"> • PT Mitra Austral Sejahtera, this issue are remain being resolved with RSPO dispute settlement facilities • PT Bina Sains Cemerlang, this issue was raise on 22 April 2017 and still being process to resolve.

iii.	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	<p>Company Group/Holding Statement: No stakeholder comments or complaints received.</p> <p>Auditor Verification: Auditor has verified the supporting evidence of above the company statement. There are no labour dispute in company unit.</p>
iv.	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	<p>Company Group/Holding Statement: None noted. No stakeholder comments or complaints received.</p> <p>Auditor Verification: Auditor has verified the supporting evidence of above the company statement. There is any legal non-compliance for company under SDP waiting for land title process, i.e.:</p> <ul style="list-style-type: none"> • PT Sime Indo Agro 1,652 Ha • PT Aneka Inti Persada 421.31 Ha • PT Bina Sains Cemerlang 308.25 Ha • PT Bersama Sejahtera Sakti 765 Ha • PT Langgeng Muaramakmur 1,162 Ha • PT Paripurna Swakarsa 1,120 Ha • PT Swadaya Andika 63 Ha • PT Bahari Gembira Ria 1,639 Ha • PT Guthrie Pecconina Indonesia 4,133 Ha • PT Perkasa Subur Sakti 1,286 Ha

3.5 Identification of Findings, Corrective Action, Observations, OFI and Noteworthy Positive Components

3.5.1 Identification of Findings, Corrective Actions and Observations at Surveillance 1.1 Assessment

NCR No.	: 2018.01	Issued by	: Benli Manurung
Date Issued	: 18 May 2018	Time Limit	: 17 July 2018
NC Grade	: Major	Date of Closing	: 06 September 2018
Standard Ref. & Requirement	1.1.2 Archives of reports regarding information requests and responses provided must be stored properly.		
Non-Conformance Description & Evidence observed (filled by auditor): Based on the results of document review and interviews with the apparatus of Sesulung village known that the letter from the village of Sesulung number 031 / 63.02.11.2018 / 2018 about Assistance for making of Football Fields submitted to the company on 23 February 2018 has not been addressed			
Root Cause Analysis (filled by organization audited): The document is still stored in the admin file (PIC: KTU) and is still stored on the KTU table so that it has not been registered in the incoming and outgoing mail book, The documentation system is not good according to the SOP, the data / document is incomplete.			
Correction (filled by organization audited): Company shows proof of receipt of the response letter to the incoming letter to Desa Sesulung which is submitted on February 25, 2018 Company conducts information dissemination procedures regarding the time to answer requests for information is 1 month after a letter is received and every outgoing and incoming letter is known by Head Adm. The socialization was given to the Head Adm. on 27 July 2018 at PLF.			
Corrective Action (filled by organization audited): Company conducts information dissemination procedures regarding the time to answer requests for information is 1 month after a letter is received and every outgoing and incoming letter is known by Head Adm.			
Assessor Evaluation and Conclusion (filled by auditor): Verification 27 August 2018 The company shows: <ul style="list-style-type: none">Internal Office Mail number 015 / SSE-Village / II / 2018 on February 25, 2018 regarding the response to the Village Letter Number 031 / 63.02.11.2018 / 2018.A copy of the information SOP socialization attendance at the PLF Office on July 27, 2018 attended by 6 participants However, company has not been able to show proof of receipt of the letter to Desa Sesulung, material of SOP Dissemination of Information Requests to Head Adm., explanation of the root cause of the problem and corrective action, so this nonconformity has not been fulfilled			
Verification 30 August 2018 The company shows:			

- Evidence of Information Procedure socialization to the KTU and Head of Section at the PLF Office on July 27, 2018 attended by 6 participants (photo and attendance attached) with the material:
 - Submission of information request procedures and the period of submission of information answers
 - Submission of information answers up to 1 month after receipt of the letter
 - Letters of entry and outgoing mail are known by Kasie / KTU
- Proof of receipt of Sesulung Village response letter (completed with signature of village head and stamp)

The company has not completed the root of the problem and corrective action in accordance with the evidence of improvements submitted. So this nonconformity is declared as not yet fulfilled.

Verification 06 September 2018

The company shows an improvement in the analysis of the root of the problem and corrective action in accordance with the problem / nonconformity

The evidences had been verified and accepted to be closed out and complied.

Verified by : Benli Manurung

NCR No.	2018.02	Issued by	Naila Karima
Date Issued	18 May 2018	Time Limit	17 July 2018
NC Grade	Major	Date of Closing	29 August 2018
Standard Ref. & Requirement	2.1.1 There must be evidence of compliance with relevant legal requirements		

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

- a. The Company has established P2K3 in each management unit Estate and Mill, however, there is not enough evidence that the company has sought to comply with compliance the Regulation of the Minister of Manpower of the Republic of Indonesia No. 4 of 1987, among others:
 - Unable to show validation of P2K3 structure due to changes in the management structure of P2K3 RPE based on Inter-Office Mail No. 106/PT PSA-RPE/IV/2017/S dated 03 April 2017 and P2K3 SSE based on SSE P2K3 Report 1st quarter January to March 2018.
 - The Letter of Appointment of OHS Expert (No. KEP.7834/M/DJPPK/VII/2014) for secretary of P2K3 SSE and PLF has expired since July 16, 2017. Related to this the company shows documentation dated July 20, 2017 in the form of training registration form, certificate, Curriculum Vitae of OHS Expert, OHS Experts report period 2014 to 2016, and copy of The Letter of Appointment of OHS Expert. However, the company has not yet been able to show the progress of the completion of the extension arrangement.
 - Cannot be shown The Letter of Appointment of OHS Expert for P2K3 secretary in RPE.
- b. The welder of SSE has not yet been shown to have qualified welders in accordance with Regulation of the Minister of Manpower of the Republic of Indonesia No. 02 of 1982.
- c. There are still of boiler operators PLF who do not have OHS license of steam in accordance with the Regulation of the Minister of Manpower of the Republic of Indonesia No. 01 of 1988.

- d. The company's paramedics in SSE and RPE have not yet been certified by industrial hygiene and occupational health in accordance with the Regulation of the Minister of Manpower of the Republic of Indonesia No. 01 Year 1979.

Root Cause Analysis (filled by organization audited):

1. Because the OHS expert for SSE has expired, the structure changes and are still being managed by the Head of Labor Agency of Kalimantan Selatan Province, and the RPE is still in the process by the Labor Agency of Kalimantan Selatan Province.
2. OHS Expert for SSE and PLF has expired and is still in the process of submitting an extension to the Ministry of Manpower Republic of Indonesia through OHS Service Company.
3. SSE have not yet qualified welder, because the welders who previously resigned will now be trained for welders.
4. Not all PLF boiler operators have an OHS license because of the rotation of the workforce and the presence of employees who resigned so that other operators and operators that will be trained in OHS license are being fulfilled.
5. Certificate of Industrial Hygiene and Occupational Health for paramedic SSE and RPE at the Central Clinic located at PT Langgeng Muara Makmur Bebunga Estate and still requested for a copy of the certificate

Correction (filled by organization audited):
Point a.

RPE, SSE, and PLF have renewed the P2K3 structure by establishing a new OHS Expert and have reported it to the Labor Agency of Kalimantan Selatan Province.

Point b and c

The company has registered names for related training welders, boiler operators and heavy equipment.

Point d

Certificate of Industrial Hygiene and Occupational Health for paramedic is available on RPE and SSE clinic.

Corrective Action (filled by organization audited):

- The company will monitor the P2K3 structure whenever there is a change in the structure in the estate and set the Section Head as PIC in each estate.
- The company re-ensures that during work rotations for workers who need special skills, they must have competencies in accordance with applicable regulations, and the Head of Section is responsible for this.
- Copies of paramedical *Hiperkes* certificates must be available at each clinic.

Assessor Evaluation and Conclusion (filled by auditor):

18 July 2018

Point d

RPE paramedics who have *Hiperkes* certificates on behalf of Nurhayati No. 15.705 / PM-XV / 13, and on behalf of Martin Irariya No. 15,704 / PM-XV / 13 was issued in September 2013 by the Indonesian Minister of Manpower and Transmigration. (closed)

24 July 2018

Point d

The company shows the *Hiperkes* Certificate No. 15.709 / PM-XV / 13 on behalf of Zaeni was published in September 2013. The Paramedic was responsible for the SSE clinic. (closed)

29 August 2018

Point a

The company shows changes in the P2K3 structure for the RPE and SSE period July 2018 with the P2K3 chairman

namely the Estate Manager and Secretary of P2K3 on behalf of Arif Sucipto who has been certified as OHS Expert (SKP No. KEP.10649 / NAKER-BINWASK3 / XII / 2017 issued by Ministry of Manpower Republic Indonesia on December 4, 2017 with a validity period of 3 years). The P2K3 structure is still in the process of being ratified by the Manpower Office of Kalimantan Selatan Province based on the Receipt of Letter / Document No. 016 / SSE-DISNAKER / VII / 2018 dated July 19, 2018.

Point b

The company shows Class I Welder Training Schedule documents which will be held on 5 to 6 September 2018 in collaboration with OHS Services Company (PT Kautsar Inti Prima), with welders participating in the training on behalf of Sopyan (SSE).

Point c

The company presented the Training Schedule for the "Certification of the Ministry of Manpower and Transmigration of PT Minamas Plantation Class I" Boilers on 05 to 07 September 2018 in collaboration with OHS Services Company (PT Kautsar Inti Prima), with PLF boiler operators participating in the training on behalf of Jumaidi and Ahmad Udiansyah.

The evidences had been verified and accepted to be closed out and complied.

Verified by : Naila Karima

NCR No.	:	2018.03	Issued by	:	M. Syarip Lambaga
Date Issued	:	18 May 2018	Time Limit	:	ASA 1.2
NC Grade	:	Minor	Date of Closing	:	12 February 2019
Standard Ref. & Requirement	:	2.2.2 Legal boundaries must be clearly defined and seen to be taken care of.			
Non-Conformance Description & Evidence observed (filled by auditor):					
Based on document review related boundaries monitoring and maintenance, Rampa Estate cannot show the monitoring report against the procedure					
Root Cause Analysis (filled by organization audited):					
Previously the maintenance schedule was conducted once a year and according to the schedule was July before the audit was conducted.					
Correction (filled by organization audited):					
Changes the monitoring schedule to twice a year, namely January and July, hold monitoring the HGU poles for the entire estate, with a schedule of 2 times a year.					
Corrective Action (filled by organization audited):					
The company sets a monitoring schedule to be 2 times a year and assigns special officers for its implementation. Head of Adm. was tasked with documenting all HGU boundary monitoring and maintenance reports					
Assessor Evaluation and Conclusion (filled by auditor):					
Verification on 12 Feb 2019,					
The company has demonstrated the implementation report of HGU poles checks, which conducted by the RPE in October 2018 (next monitoring scheduled to be carried out in March 2019), based on the results of the checks there 14 poles identified missing, 1 damaged, 1 position not leaning and 3 unreadable numbers. The company has made					

plans and processes for installing new poles.

The company also show records of HGU border monitoring for all other estates:

- Last monitoring in PLE was carried out in December 2018. Based on field observations on 4 HGU poles that were sampled, there were 2 stakes that were not in place and 2 unreadable stakes. Plans for improvement and follow-up of the monitoring results have been determined by PLE, re-installation and re-numbering of all poles is planned to be carried out in February to March 2019.
- Monitoring and maintenance of HGU poles in SSE is carried out on November 23, 2018, against 187 HGU poles. The entire are in good condition, there is evidence of maintenance in the form of repainting and re-numbering.
- Monitoring of the HGU poles in BNE was carried out on Feb. 8, 2019, with the identified damaged and lost poles being planned for re-installation and repainting in Feb 2019.

The evidences had been verified and accepted to be closed out and complied.

Verified by : **Sandra Purba**

NCR No.	: 2018.04	Issued by	: Briyogi Shadiwa
Date Issued	: 18 May 2018	Time Limit	: Surveillance-1.2
NC Grade	: Minor	Date of Closing	: 14 February 2019
Standard Ref. & Requirement	: 4.2.2 Reports of fertilizer use records must be maintained properly.		
Non-Conformance Description & Evidence observed (filled by auditor):			
The company not yet shown the document of fertilization program and realization for Rampa Estate.			
Root Cause Analysis (filled by organization audited):			
The program and realization of RPE fertilization is available but has not yet been shown to the Auditor because during the PIC audit there is still other documents requested by the auditor so that when the closing of the document cannot be shown.			
Correction (filled by organization audited):			
PIC Documents are held by the Head of Administration and the program and realization of fertilization 2018 are attached.			
Corrective Action (filled by organization audited):			
The Head of Administration (PIC) continues to document in the estate's monthly report.			
Assessor Evaluation and Conclusion (filled by auditor):			
Verification 21 July 2018			
The certificate holder has not filled in the root cause analysis column, correction and corrective action. Based on this explanation, nonconformities have not been fulfilled.			
Verification 14 February 2019			
The certificate holder showed evidence of improvement in the form of a Program and Realization of Rampa Estate Fertilization 2018 document in which explained that for carry forward fertilizers the period 17/18 was completed in the period 2018 (January - June) and fertilization programs for the period January - June 2018 were completed			

according to the program.

The evidences had been verified and accepted to be closed out and complied.

Verified by : Afiffuddin

NCR No.	: 2018.05	Issued by	: Briyogi Shadiwa
Date Issued	: 18 May 2018	Time Limit	: Surveillance-1.2
NC Grade	: Minor	Date of Closing	: 14 February 2019
Standard Ref. & Requirement	4.3.3 Road maintenance programs must be available.		
Non-Conformance Description & Evidence observed (filled by auditor):			
The company not yet shown the document of road maintenance for Rampa Estate.			
Root Cause Analysis (filled by organization audited):			
The program and realization of RPE road maintenance are available but have not yet been shown to the Auditor because during the PIC audit there were still other documents requested by the auditor so that when the closing of the document cannot be shown.			
Correction (filled by organization audited):			
PIC Documents are held by the Head of Administration and the program and realization of road maintenance 2018 are attached.			
Corrective Action (filled by organization audited):			
The Head of Administration (PIC) continues to document in the estate's monthly report.			
Assessor Evaluation and Conclusion (filled by auditor):			
Verification 21 July 2018			
The certificate holder has not filled in the root cause analysis column, correction and corrective action. Based on this explanation, nonconformities have not been fulfilled.			
Verification 14 February 2019			
The certificate holder shows proof of improvement in the form of a Road Condition Map document period 2017/2018 that describes the road conditions (good or damaged), details of the length of the road and its condition and photos of road conditions. In addition, the company also shows the Road Quality Improvement document period 2017/2018 that explains repaired road points, detailed road lengths that have been repaired and photos of road conditions after being repaired.			
The evidences had been verified and accepted to be closed out and complied.			
Verified by	: Afiffuddin		

NCR No.	: 2018.06	Issued by	: Briyogi Shadiwa
Date Issued	: 18 May 2018	Time Limit	: 17 July 2018
NC Grade	: Major	Date of Closing	: 2 September 2018
Standard Ref. & Requirement	: 4.5.1 Implementation of Integrated Pest Management (IPM) plans must be monitored.		
Non-Conformance Description & Evidence observed (filled by auditor): <p>The company not yet shown document of Plan, Monitoring, and Handling of IPM for Rampa Estate.</p>			
Root Cause Analysis (filled by organization audited): <p>Integrated pest Management document not yet shown to auditor because of the PIC personnel is new and not known about the responsibility.</p>			
Correction (filled by organization audited): <p>Company shown Integrated pest Management document for Rampa Estate.</p>			
Corrective Action (filled by organization audited): <ul style="list-style-type: none"> • Determination of PIC Syarifuddin as IPM Officer in RPE as of June 25, 2018 by letter No. 043 / RPE / Intern / pet. PPH / VI / 2018 / s • Determination of the PIC that gives new workers socialization of understanding; EM, Senior Assistant and KTU / Head of Section <p>Develop a mechanism for determining job desc for responsible / new workers.</p>			
Assessor Evaluation and Conclusion (filled by auditor): <p>Verification 21 July 2018 The company shown IPM document period 2017.</p> <p>The company not completed root cause analysis, corrective action and the personnel of PIC suitable with correction which has been made.</p> <p>Verification 2 September 2018 The company shown IPM document period 2018 and determine the competent PIC. The evidences had been verified and accepted to be closed out and complied and will be observed on the next assessment.</p>			
Verified by	: Briyogi Shadiwa		

NCR No.	: 2018.07	Issued by	: Briyogi Shadiwa
Date Issued	: 18 May 2018	Time Limit	: 17 July 2018

NC Grade	: Major	Date of Closing	: 02 September 2018
Standard Ref. & Requirement	4.6.2 Records of the use of pesticides (including the active ingredients used and the LD50 of the active ingredients, the targeted area, the number of active ingredients applied per ha and the number of applications) must be provided.		
Non-Conformance Description & Evidence observed (filled by auditor): The company not yet shown the document of the use of pesticide for Rampa Estate.			
Root Cause Analysis (filled by organization audited): RPE not yet made record of pesticide utilization at the assessment activity, the responsible staff is new and not already know about the responsibility			
Correction (filled by organization audited): <ul style="list-style-type: none"> • The company (RPE) makes a complete recapitulation of pesticide use in accordance with the LD50 of its active ingredients • Determine Syarifuddin as PIC IPM Officer in RPE as of June 25, 2018 with letter of appointment No. 043 / RPE / Intern / pet. PPH / VI / 2018 / s and has understood their duties and responsibilities 			
Corrective Action (filled by organization audited): <ul style="list-style-type: none"> • Ensure a monitoring plan for the use of pesticides with LD50 active ingredients in Rampa Estate. • Determination of the PIC that gives new workers socialization of understanding; EM, Senior Assistant and KTU / Head of Section • Develop a mechanism for determining job description for responsible / new workers. 			
Assessor Evaluation and Conclusion (filled by auditor): Verification 21 July 2018 The company shown corrective evidence with IPM document period 2017. However the document still not define root cause, corrective action and LD50 active ingredients. Verification 2 September 2018 The company shown IPM document period 2018 (with LD50 active ingredients) and determine the competent PIC. The evidences had been verified and accepted to be closed out and complied.			
Verified by	: Briyogi Shadiwa		

NCR No.	: 2018.08	Issued by	: Briyogi Shadiwa
Date Issued	: 18 May 2018	Time Limit	: Surveillance 1.2
NC Grade	: Minor	Date of Closing	: 14 February 2019
Standard Ref. & Requirement	4.6.4 Pesticides that are categorized as World Health Organizations Class 1A or 1B, or listed in the Stockholm or Rotterdam Conventions, and paraquat, are not used, except in special situations that have been identified in the national Best Practices guidelines. The use of these pesticides must be minimized and eliminated as part of the plan, and should only be used in exceptional conditions.		

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

For Rampa Estate there has not been enough evidence that pesticide use, which belongs to the World Health Organization Class 1A or 1B, or listed in the Stockholm or Rotterdam Conventions, and paraquat has been marginalized and written off as part of the plan, and may only be used in exceptional conditions.

Root Cause Analysis (filled by organization audited):

The list of pesticides used by RPE is available but has not been shown to the Auditor because the PIC audit still presents other documents requested by the auditor so that the document does not arrive at closing.

In the use of pesticides in 2018 there were no pesticides which belonged to the class 1A or 1B category, or paraquat which the certificate holder had not used for a long time.

Correction (filled by organization audited):

On December 1, 2018 a policy was made from the chairman of PT PSA to reduce up to zero class 1A or 1B pesticide use (attached).

Corrective Action (filled by organization audited):

Continue to supervise the use of pesticides of class 1A or 1B provided that they are used if in urgent conditions or above a high threshold.

Assessor Evaluation and Conclusion (filled by auditor):
Verification 21 July 2018

The certificate holder has not filled in the root cause analysis column, correction and corrective action. Based on this explanation, nonconformities have not been fulfilled.

Verification 14 February 2019

The certificate holder shows proof of improvement in the form of a Policy for Decreasing the Use of Class 1A and 1B Pesticides on 1 December 2018 and Pesticide Usage per Hectare and Per Ton document FFB Production Rampa Estate which explains the types of pesticides used during the period July 2017 - June 2018 which are not included in the category World Health Organization Class 1A or 1B, or listed in the Stockholm or Rotterdam Conventions.

The evidences had been verified and accepted to be closed out and complied.

Verified by : Afiffuddin

NCR No.	: 2018.09	Issued by	: Naila K. & Briyogi S.
Date Issued	: 18 May 2018	Time Limit	: 17 July 2018
NC Grade	: Major	Date of Closing	: 29 August 2018
Standard Ref. & Requirement	4.7.3 Records of training on Occupational Health and Safety (OHS) (see 4.8) and Personal Protective Equipment (PPE) in accordance with the results of hazard identification and risk analysis must be available to all workers.		
Non-Conformance Description & Evidence observed (filled by auditor):			

Results of field visits and interviews with harvest workers in K28 Block 2nd Division RPE and in Block K47 Division 1 SSE were submitted that boots were only given once during work and currently the shoes used by harvesters were bought by themselves, whereas in the fertilizer workers in Block L37 Division 3 RPE recognized that the PPE in the form of shoes not given the company but the workers buy themselves.

This is not yet in accordance with Article 47 within the CLA which states that the company will provide PPE with consideration of risks arising according to the HIRAC analysis. In addition, the company also has not been able to show the management of PPE in the form of identification, the selection of PPE as the basis for determining the specification of PPE in accordance with the type and risk of work, the life of the PPE, the replacement mechanism, supervision mechanism, and other provisions as regulated in *Permenaker* No. 08 Year 2010.

Root Cause Analysis (filled by organization audited):

PPE given to employees such as clothes and shoes given once a year will also be given every time there is a report on PPE damage, but for shoes that have been damaged, they will be replaced by following PPE replacement procedures, among others: 1) Must report to the supervisor and the damage is indeed due to work activities in the company; 2) Must be able to show proof of the damaged shoe. Of several cases, employees have not understood the procedure for replacing damaged shoes.

Correction (filled by organization audited):

- RPE has disseminated the PPE procedures on August 21, 2018 and SSE on August 20, 2018 including the mechanism if a broken shoe can be delivered to the supervisor by submitting damaged evidence and ensuring that the damage is caused by work in the company.
- RPE hand over shoes to RPE div II / III employees on August 21, 2018, while SSE DIV I hand over Shoes and Helmets on July 2, 2018 (dock attached)

Corrective Action (filled by organization audited):

- RPE has disseminated the PPE procedures on August 21, 2018 and SSE on August 20, 2018 including the mechanism if a broken shoe can be delivered to the supervisor by submitting damaged evidence and ensuring that the damage is caused by work in the company.
- Ensure and monitor daily use of PPE so that if there is a damaged of PPE, it can be identified immediately and replaced. The inspection format is attached 8.1

Assessor Evaluation and Conclusion (filled by auditor):

18 July 2018

The company shows the Minutes of Handling of APD (Shoes) dated June 5, 2018 for spray workers in Division 3 of Rampa Estate.

However the company:

- Has not made the root of the problem, corrections and corrective actions in accordance with the evidence of improvements submitted
- Not yet showing the procedures for giving and changing PPE.

Thus this discrepancy is declared as not yet fulfilled.

24 August 2018

The Company shows the Personal Protective Equipment Procedure (No. Policy 739 / TQEM-ESH / 10, November 1, 2016) which describes PPE, sets minimum requirements and provides advice to determine additional PPE that is required by some activities or the work environment. In the Procedure is stated that all PPE must be replaced after it is known that it does not provide a guarantee of protection, except the shoes PPE will be given once a year

according to the budget set by the management unit, and to replace damaged shoes before one year must meet the requirements set by the company.

In addition the company shows the following records:

- Handover of PPE (work shoes) in Division III on August 21, 2018
- Dissemination of PPE use in SSE Division II on August 20, 2018
- Socialization of PPE use to Division III SSE employees (harvest and transport) on August 23, 2018
- Dissemination of the use of PPE to Fertilizer Division IV SSE workers on August 23, 2018

However, the company has not been able to show the dissemination material that is done so that this discrepancy is declared as not yet fulfilled.

29 August 2018

The company shows:

- Recording of socialization delivered to RPE and SSE workers on August 20 and 21, 2018, with the material presented regarding PPE procedures starting from the mechanism of replacement of damaged PPE, the period of PPE usage, and monitoring of PPE that will be carried out every morning briefing.
- Minutes of PPE Handover in Division 2 and 3 RPE on August 21, 2018 for 35 fertilizers and 52 harvesters.
- Minutes of PPE Handover in SSE Division 1 on July 2, 2018 for 23 harvest workers with received PPE are shoes and helmets.

The evidences had been verified and accepted to be closed out and complied.

Verified by : Naila Karima

NCR No.	: 2018.10	Issued by	: Naila Karima
Date Issued	: 18 May 2018	Time Limit	: Surveillance-1.2
NC Grade	: Minor	Date of Closing	: 14 February 2019
Standard Ref. & Requirement	: 5.1.3 This plan must have monitoring protocols, which are flexible to operational changes, and must be implemented to monitor the effectiveness of negative impact reduction measures. This plan must be reviewed at least every two years to reflect monitoring results and to see if there are operational changes that have a positive and negative impact on the environment.		
Non-Conformance Description & Evidence observed (filled by auditor):			
<p>The Company shows EIA implementation (RKL-RPL) for the period I (January to June) and period II (July to September) 2017 which refers to the governance and monitoring matrix in RKL RPL document (No. 047/RKL-RPL/BA/III/1995, 30 March 2011). However, based on the review of the document:</p> <ul style="list-style-type: none">a. No monitoring results of Upstream and Downstream Rivers of Mill, and Biyuku River for the second semester of 2017 are referring to the monitoring period in the RPL RPL matrix for water quality test every six months.b. There is no social impact monitoring available for public view of the existence of PT PSA and changes in scheme smallholders for the period of 2017, in accordance with the monitoring period in the RPL RPL matrix once a yearc. Not enough evidence of animal monitoring has been done in accordance with the monitoring period in the RKL / RPL matrix, ie every 6 months.d. There is no critical level evaluation available for the period of 2017 and an evaluation of trends to see trends in			

changes in environmental quality over time and span.

Root Cause Analysis (filled by organization audited):

- The results of the second semester of 2017 water analysis during the audit have not yet come out from the Sucofindo lab
- The social impact monitoring plan is conducted every 2 years and on the existing schedule should be carried out in December 2017 but because there is a vacancy of PSQM Staff as a coordinator for social monitoring, the activity is not implemented.
- For 2017, it has been done once a year according to schedule, but the RKL RPL has not been included in the appendix of the monitoring results due to the delay in delivering from Mill to estate as its compiler.
- The comparison of the second semester 2017 with the first semester 2018 has not been conducted during the audit visit because it is still awaiting the results of the environmental analysis from the Hiperkes Lab.

Correction (filled by organization audited):

- The results of the analysis have been sent from Sucofindo Lab in June 2018.
- An environmental impact evaluation was carried out in November 2018.
- In the second semester of 2018 RKL RPL, the results of monitoring of flora and fauna have been contained in the RKL RPL.
- Environmental evaluation has been carried out with the parameters of the Hiperkes Lab inspection results starting in semester II 2017, semester I 2018 and semester II 2018 on January 21, 2019

Corrective Action (filled by organization audited):

- Keep sending river water samples with a 6-month schedule to Sucofindo Lab for RKL RPL monitoring.
- Making an environmental impact evaluation schedule every 1 year (schedule attached)
- Always include monitoring results of flora and fauna in the RKL RPL so that the conditions in PT PSA are monitored.
- Continue to conduct environmental evaluations from the results of Lab analysis so that if there is a result that is above the threshold then corrective action can be taken immediately.
- Designate the PIC, namely safety officer, Head of Staff, and Lab Analyst to monitor and ensure scheduling of water testing.
- Designate the PIC, namely PSD and PSQM to monitor and ensure the scheduling of SIA evaluations.
- Designate the PIC, namely HCV officers, Safety Officers and Garden Assistants to monitor and ensure monitoring of flora and fauna.
- Designate the PIC, namely, Safety Officer and PSQM to monitor and ensure monitoring of flora and fauna.

Assessor Evaluation and Conclusion (filled by auditor):

31 July 2018

The company has not established root causes, corrective actions and corrective actions. Nonconformity No. 2018.10 has not been fulfilled.

Auditor Verification during the implementation of the ASA 1.2 Audit

The company has revised the 2nd semester RKL-RPL Implementation Document in 2018, which has monitored and contained the type of impact in accordance with the RKL-RPL matrix owned. Also attached are supporting documents such as the results of testing and social impact monitoring questionnaires. **The evidences had been verified and accepted to be closed out and complied.**

Verified by : **Rizliani Aprianita Hsb**

NCR No.	:	2018.11	Issued by	:	Benli Manurung
Date Issued	:	18 May 2018	Time Limit	:	14 May 2019

NC Grade	:	Raise to Major	Date of Closing	:	10 May 2019
Standard Ref. & Requirement	:	6.1.4 These plans must be reviewed at least every two years and updated as needed, if the review process shows that the practices being implemented should be changed. There must be evidence that the review process involves the participation of all affected parties.			
Non-Conformance Description & Evidence observed (filled by auditor): Based on the document review known that the company has conducted SIA evaluation in 2015, but until audit ASA-1.1 the company has not yet did re-evaluated as required by RSPO that is evaluation at least once in 2 years.					
Root Cause Analysis (filled by organization audited): The social impact monitoring plan is conducted every 2 years and on the existing schedule should be carried out in December 2017 but because there is a vacancy of PSQM Staff as a coordinator for social monitoring, the activity is not implemented.					
Correction (filled by organization audited): <ul style="list-style-type: none">- An environmental and social impact evaluation was carried out in November 2018 (attached)- Addition of a social impact evaluation questionnaire to representatives of employees, labor unions, gender and contractors on February 17, 2019					
Corrective Action (filled by organization audited): Preparation of an environmental and social impact evaluation schedule every 2 years (schedule attached)					
Assessor Evaluation and Conclusion (filled by auditor): Auditor Verification during the implementation of the ASA 1.2 Audit The company showed evidence of social impact evaluation conducted in participatory manner in September 2018 in the form of a questionnaire totaling 9 questionnaires. The results of interviews with management, conveyed that participants came from the community. The participants came from Pondok Labu (1 person), Rampa (2 people), Sesulung (3 people) and Binturung (3 people). Based on the results of interviews with the Head of Pondok Labu Village, it was stated that the person concerned had not been involved in the evaluation of the social impacts. In addition, there is no evidence that social impact evaluations have involved workers, contractors, Labor Union, gender committees, etc. Based on the explanation above, it was concluded that there was not enough evidence that the review of the management and monitoring of social impacts had involved all affected parties. In this case, the Minor NCR upgraded to MAJOR.					
Verification on May 3, 2019 The company shows evidence of improvement in the form of: <ul style="list-style-type: none">- PT PSA Social Questionnaire on February 2019 consisting of representatives from community leaders and residents of Pondok Labu village, employees of Pondok Labu estate, contractors, gender committees of pondok labu estate, and labor union of Pondok Labu estate. However, there is no evidence of involvement of workers, contractors, Labor union, gender committees from Binturung, Rampa and Sesulung Estate. Based on the explanation above, it was concluded that nonconformities were stated to have not been fulfilled.					
Verification on May 10, 2019 The company shows evidence in the form of : <ul style="list-style-type: none">- The Social Impact Management and Monitoring Program which also includes a schedule for the Evaluation of Social Impact Management which will be conducted in September 2020 conducted by Section Head / Head of Administration / PSQM / PSD Staff.- PT PSA Social Questionnaire that has involved internal stakeholders (workers, labor union, gender committee) and contractors in Sesulung Estate, Binturung Estate and Rampa Estate.					

The evidences had been verified and accepted to be closed out and complied.

Verified by : Rizliani Aprianita Hsb

NCR No.	: 2018.12	Issued by	: Naila Karima & Briyogi Shadiwa
Date Issued	: 18 May 2018	Time Limit	: 17 July 2018
NC Grade	: Major	Date of Closing	: 05 September 2018
Standard Ref. & Requirement	8.1 The planters and palm oil mills regularly monitor and review their activities and develop and implement action plans that enable real and sustainable improvements in key operations.		
Non-Conformance Description & Evidence observed (filled by auditor): Based on a summary of the results of non-conformities identified at the time of the RSPO Re-Certification assessment, the auditor team considers that there is an ongoing commitment to continuous improvement that is not fully implemented with regard to recurrence of non-conformities arising from surveillance activities 1.1 a. In the Re-Certification activities there is non-conformity of Major 4.7.3 concerning maintenance workers who are not provided any PPE by the company. The corrective actions set by the company one of them by proving the commitment in the procurement of PPE (safety shoes) to the care personnel in PLE, BNE, RPE and SSE. However, ASA 1.1 activities still found workers who bought their own PPE based on interviews with fertilizer workers in Block L37 Division 3 RPE. b. In the Re-Certification activities there is a non-conformity of Minor 4.7.5, as for the prevention measures established by the company strengthening check list monitoring of the use of first aid box in the field. The inspection will be conducted by the socialized safety officer related to Minister of Manpower No.15 of 2008. The examination will be done once a month by the safety officer and every six months through the health and safety assessment by assistant EHS Pamukan. Inspection results will be reported to the manager for follow-up improvements. However, in ASA 1.1 activity result of field visit at SSE and RPE Warehouse Agrochemical, RPE Workshop, Hazardous Waste PLF, PLF Workshop, spraying activity in Block K15 Division 1 RPE and Block L46 Division 1 SSE, fertilizer activity in Block S04 Division 3 SSE, harvest activity in Block K28 Division 2 RPE, still found equipment of First Aid in incomplete condition according to Minister of Manpower No. 15 of 2008.			
Root Cause Analysis (filled by organization audited): The commitment to continuous improvement that has not yet been fully implemented is related to the recurrence of the discrepancies that emerged in surveillance activities 1			
Correction (filled by organization audited): Making a precautionary measure and improve the RSPO ASA 1 audit findings in PT PSA systematically so that with the systematic implementation the same findings will not be repeated. By preventing and improving audit findings by conducting routine inspections by the PIC of each job, including by Supervisor, Assistant, Senior Assistant and Safety Officer. The PIC has been determined by PSQM according to their respective fields of work including internal audit. With the mechanism of checking at the morning briefing, monthly inspection by the safety officer and annual inspection by the PSQM Internal Audit.			
Corrective Action (filled by organization audited): A preventive action plan has been developed to avoid recurrence of nonconformities on August 1, 2018, so that with the plan and filling in the use of the format, it can keep the non-conformities from recurring and an internal audit is always carried out by PSQM for the implementation of RSPO in the Unit			

Assessor Evaluation and Conclusion (filled by auditor):

24 July 2018

Determining the root causes of problems and corrective and corrective actions have not responded to the discrepancies and have not been systematically related to the company's commitment to implementing RSPO standards and ensuring non-recurring nonconformities

Thus the non-conformity has not been fulfilled.

29 August 2018

The company showed the Non-conformity Preventive Action Management Program that was made on August 1, 2018. The program included APAR and First Aid examinations that conducted every month, PPE checked before work carried out every day and First Aid socialization at morning briefings before work.

Companies need to re-identify the root of the problem, determine corrective actions, and corrective. Thus this discrepancy is declared not fulfilled

05 September 2018

The Company shows a Preventive Action Management Program that was created and endorsed on August 1, 2018, with one of its programs being planned for Internal Audit every 1 year with the PSQM Department as the PIC

The evidences had been verified and accepted to be closed out and complied.

Verified by	:	Naila Karima
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3.5.2 Identification of Findings, Corrective Actions and Observations at Surveillance 1.2 Assessment

NCR No.	: 2019.01	Issued by	: Rizliani Aprianita Hsb
Date Issue	: 15 February 2019	Time Limit	: ASA 1.3
NC Grade	: Minor	Date of Closing	:
Standard Ref. & Requirement	: 1.1.1 There should be a list of information related to Criteria 1.2 that can be accessed by relevant stakeholders.		
Non-Conformance Description & Evidence observed (filled by auditor): <ul style="list-style-type: none"> - Based on the results of the document verification it is known that the company has sent the 2nd semester RKL-RPL Implementation Report 2018 through the delivery of JNE to the Environmental Agency of Kotabaru Regency and the Environmental Agency of South Kalimantan Province on 11 February 2019. During the ASA 1.2 audit, the company revised the RKL-RPL Implementation Report for semester 2 of 2018. However, the document has not been submitted to the relevant Office, so this becomes NCR 2019.01. - Results of interviews with contract workers in the block G34 Div 1 PLE (pest control), it was conveyed that workers had not received a copy of the agreement. This is not in accordance with Law No. 13 of 2003 article 54 which states that work agreements are made in at least 2 copies which have the same legal force and workers and employers each get 1 work agreement. 			
Root Cause Analysis (filled by organization audited):			
Correction (filled by organization audited):			
Corrective Action (filled by organization audited):			
Assessor Evaluation and Conclusion (filled by auditor):			
Verified by	:		

NCR No.	: 2019.02	Issued by	: Rizliani Aprianita Hsb
Date Issue	: 15 February 2019	Time Limit	: ASA 1.3
NC Grade	: Minor	Date of Closing	:
Standard Ref. & Requirement	: 2.1.2 A documented system, including written information about legal requirements, should be maintained.		
Non-Conformance Description & Evidence observed (filled by auditor): <p>The company has a list of legal requirements contained in the List of RSPO-related Regulations in 2019. There are a total of 224 lists of regulations with all of them fulfilled in accordance with the evaluation of regulations. Based on</p>			

the verification of the document, there are still regulations that have not been contained in the list of company regulations, for example but not limited to:

- Government Regulation no. 78 of 2015 concerning Wages.
- Government Regulation No. 44 of 2015 concerning the Implementation of accident insurance and life insurance Programs
- Government Regulation No. 45 of 2015 concerning the Implementation of the Pension Guarantee Program
- Government Regulation No. 46 of 2015 concerning the Implementation of the JHT Program
- Permenaker no. 3 of 1986 concerning OHS of Pesticide Requirements.
- Kalimantan Selatan Governor Decree No. 188.44 / 0598 / KUM / 2018 concerning Regency / City Minimum Wages.

Root Cause Analysis (filled by organization audited):

Correction (filled by organization audited):

Corrective Action (filled by organization audited):

Assessor Evaluation and Conclusion (filled by auditor):

Verified by :

NCR No.	: 2019.03	Issued by	: Sandra Purba
Date Issued	: 15 February 2019	Time Limit	: 14 May 2019
NC Grade	: Major	Date of Closing	: 14 May 2019
Standard Ref. & Requirement	: 2.2.1 Documents showing legal ownership or lease, history of land tenure ownership/control, and the actual legal use of the land shall be available.		
Non-Conformance Description & Evidence observed <i>(filled by auditor):</i> Based on the statement area, the PT PSA management area is 16,012 Ha , the document verification shows that up to ASA 1.2, the area which has land title is an area of 14,892 Ha, and an area of 1,119.97 ha is in the process of HGU since 2008. Cadastral measurements and Committee B's evaluation have been carried out, in the letter and the attendant list of committee B stated that the area approved for the issuance of the HGU is 914.45 Ha. Thus, based on this, there is a variant between the management area and the HGU area plus the B / cadastral area of 205.52 Ha . Related to this, the company has not been able to show the HGU or HGU process for the variant area.			
Root Cause Analysis <i>(filled by organization audited):</i> All the legal document are kept by PSD Dept Minamas Plantation, regarding to the latest HGU pocess not yet updated to PT PSA.			
Correction <i>(filled by organization audited):</i> It has been submitted by PSD Minamas Head Office related to the details of process of HGU 1,119.97 ha and detailed measurement results			
Corrective Action <i>(filled by organization audited):</i>			

Head Adm shall update the process of HGU to PSD Jakarta

Assessor Evaluation and Conclusion (filled by auditor):

Verification on May 2, 2019,

The company has shown evidence of correction, namely:

1. Communication results from PT PSA with PSD Dept. which explained the comparison of measurement results of PT PSA's HGU in 2008 and 2018, where the total measurements in 2008 covering an area of 1,119.97 Ha and the results of 2018 measurements were 984.2 Ha, with variants covering an area of 135.77 Ha.
2. Land maps of results of measurements in 2008 covering an area of 1,119.97 Ha map number 21-17.10-2008 scale 1: 20000 issued by BPN South Kalimantan on 4 August 2008
3. Map of land no. 71/2018 scale 1: 10000, by BPN on August 30, 2018 covering an area of 785 ha
4. Map of land area no. : 78/2018 scale 1: 2500, by BPN on 7 September 2018, covering an area of 50 Ha, NIB: 17.10.00.00.00194
5. Map of land No. : 79/2018, by BPN on 7 September 2018 covering an area of 70 ha

Verification on 11 May 2019,

The company has shown additional evidence, namely:

1. Map of land No. : 78/2018, published on 7 September 2018, NIB: 17.10.00.00.00193, area of 14.63 Ha, by BPN South Kalimantan
2. Map of land No. : 78/2018, published on 7 September 2018, NIB: 17.10.00.00.00195, 64 hectares, by BPN South Kalimantan
3. Letter of invitation for the meeting evaluation of committee B over area of 914.45 Ha to PT PSA dated 8 October 2018, no. : 835 / 300.10 / X / 2018
4. Email an explanation from PS-Land Development & License Jakarta, Minamas Plantation regarding differences in operating area with total permit, with the following explanation:
 - ✓ Differences of total licensing is 15,886.20 Ha (Data per 31 Oct 2018) VS total operating area 16,011.98 Ha = 135.78 Ha.
 - ✓ All planting areas are included in the permit.
 - ✓ In accordance with the proposal from the POD regarding the difference in the area of Operating Area VS Licensing, it is necessary to adjust the Operating Area Data (deductible) so that the data on the area of total licensing will be the same as the total operating area.
 - ✓ Initially Total Licensing (Data as of June 30, 2012) was 16,011.97 Ha. But in 2018 the Government (BPN) can only approve an additional area of 984.20 Ha (total area of 15,876.20 Ha). Areas that do not get approval are areas that cannot be controlled (occupational), villages etc.

MINAMAS PLANTATION
STATUS OF LAND LICENSES

No	Company (PT)	Licenses		Date of Issue	Expiry Date	Tenure (Years)	As per 31 Oct 2018 (Ha)	Remaining Years
		Type of certificate	Certificate No.					
3	Paripurna Swakarsa (PSA)	1. Sertipikat HGU	14/ Kotabaru	1-Dec-97	22-Nov-32	35	14,892.00	14
		2. Proses HGU (Pan-B & Rekom HGU)					984.20	
		Sub Total					15,876.20	

Verification on May 14, 2019,

The company has shown a map of the PSA statement area that informs the area that was not approved by the BPN for the issuance of 135 hectares of HGU in PLE, the area is Pondok Labu Village and outside the planting area. **The evidences had been verified and accepted to be closed out and complied.**

Verified by :
Diverifikasi oleh : **Sandra**

NCR No.	: 2019.04	Issued by	: Afiffuddin
Date Issue	: 15 February 2019	Time Limit	: ASA 1.3

NC Grade	:	Minor	Date of Closing	:	
Standard Ref. & Requirement	:	4.2.4 A nutrient recycling strategy is recorded, including use of Empty Fruit Bunches (EFB), land application, and palm residues after replanting			
Non-Conformance Description & Evidence observed (filled by auditor): Based on the results of document review, interviews with management and field observations, there were non-conformities related to the implementation of empty fruit bunch recycling of nutrients, namely as follows: <ul style="list-style-type: none"> The empty fruit bunch application program for the period July - December 2018 has not been realized according to plan, for example in the Sesulung Estate program 2,777.95 tons applied 370.73 tons and in the Binturung Estate program 6,240 tons and applied for 3,590 tons, this is in line with the results of field visits that many empty fruit bunch which accumulate and have not been applied to the land either in the mature plant area or in the immature plant area, for example in the block L48 Division 2 Sesulung Estate and block D14 Division 2 Pondok Labu Estate. There are empty fruit bunch which are not in accordance with the program block and are not applied, for example in Sesulung Estate block L51. <p>The foregoing is not in accordance with the document Agricultural Reference Manual (ARM) No. Policy 110 / EST-ARM / 13 Part 8 concerning Fertilization of Palm Oil Plants.</p>					
Root Cause Analysis (filled by organization audited):					
Correction (filled by organization audited):					
Corrective Action (filled by organization audited):					
Assessor Evaluation and Conclusion (filled by auditor):					
Verified by	:				

NCR No.	:	2019.05	Issued by	:	Yudhi Yuniarto Tallutondok
Date Issued	:	15 February 2019	Time Limit	:	14 May 2019
NC Grade	:	Major	Date of Closing	:	8 May 2019
Standard Ref. & Requirement	:	4.6.5 Evidence of pesticide application by trained person and in accordance with application guidelines in product label and storage guidelines shall be available. Appropriate safety equipment shall be provided and utilized. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7)			
Non-Conformance Description & Evidence observed (filled by auditor): The company has a Chemical Handling Procedure with PLF / SOP.ESH / 04 number dated January 11, 2011. However, based on the results of field observations it is known that the implementation has not been in accordance with the company's procedures as follows:					

- Not all chemicals in the PLE are equipped with MSDS, for example MSDS for kenlon, kenly, ken up In addition, there are MSDS in English such as lifeline, racumin and spreader.
- Not all chemicals in the warehouse BNE have MSDS such as antracol, racumin, cozeb, lifeline.
- There are MSDS in English at SSE such as racumin, abolition and lifeline.
- During interviews with spray workers at Sesulung Estate, workers did not understand the MSDS.

Root Cause Analysis (filled by organization audited):

1. The MSDS at PLE, BNE and SSE have not been installed because before the chemicals have been exhausted so that the MSDS is returned by the clerk, and after the chemical arrives the new stock has delayed the re-installation of the intended MSDS by the warehouse clerk.
2. The employee's understanding of the MSDS is delivered in a general sense because the use of chemicals always changes depending on the type of work.
3. English MSDS is still installed because the MSDS has not been obtained in the Indonesian language provided by the Pesticide supplier.

Correction (filled by organization audited):

1. MSDS has been re-installed in accordance with the available stock in the warehouse and MSDS has also been installed in the Indonesian language
2. Socialization of the MSDS to workers about the MSDS according to the chemicals and documented in the SSE
3. Make / compile MSDS in Indonesian based on MSDS in English so that Indonesian can be better understood by employees.

Corrective Action (filled by organization audited):

1. Ensure that the MSDS is installed according to the available stock by the warehouse clerk in an update.
2. Continue to do MSDS socialization on the use of chemicals and how to handle them for each type of chemical by Supervision and Staff to employees by Safety Officer
3. The warehouse clerk ensures that the MSDS in the Indonesian language has been prepared by the Safety Officer by referring to the Original MSDS of the Product used.

Assessor Evaluation and Conclusion (filled by auditor):

Auditor Verification on May 8, 2019

The company sends some proof of improvement as follows:

1. MSDS for NPK 44 Racum, Lifeline, Spreader and Fertilizer material in Indonesian.
2. Documentation of lack of MSDS installation in the Chemical Warehouse of PLE, BNE and SSE.
3. MSDS socialization documentation to SSE employees which was held on March 14, 2019 and located at SSE division 2 office. The socialization was attended by SSE spray employees. Available documentation, material and attendance list for the training.

The evidences had been verified and accepted to be closed out and complied.

Verified by : Yudhi Yuniarto Tallutondok

NCR No.	2019.06	Issued by	Afiffuddin
Date Issued	15 February 2019	Time Limit	14 May 2019
NC Grade	Major	Date of Closing	10 May 2019
Standard Ref. & Requirement	4.6.6 Storage of pesticides shall be according to recognised best practices. All pesticides containers shall be properly managed according to the existing regulations and or instructions enclosed on the containers (see criterion 5.3).		

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

- Based on the results of field observations in the Rampa Estate pesticide warehouse, it is known that the storage of chemicals for pesticides / herbicides is mixed with other materials such as fire extinguishers, water tanks and paralon.
- Based on the results of field observations to the Binturung Estate, it is found *Kencepat* pesticides are located in general warehouse and Division 2 office.

This is not in accordance with *Peraturan Menteri Tenaga Kerja* (Minister of Manpower Regulation) number 3 of 1986 concerning *Syarat Keselamatan dan Kesehatan Kerja di Tempat Kerja yang Mengelola Pestisida* (Occupational Health and Safety Requirements in the Workplaces that Manage Pesticides).

Root Cause Analysis (filled by organization audited):

Limited space for storage of materials so that some materials have to be stored with pesticides in a pesticide storage area that is still sufficient to accommodate other materials.

Correction (filled by organization audited):

Storage of pesticides in Rampa Estate and Binturung Estate has been carried out which are not mixed with other materials (attached).

Corrective Action (filled by organization audited):

The head of administration / warehouse officer ensured that pesticide storage was not mixed with other materials and made special Agrochemical places / rooms so that no more agrochemicals were placed outdoors and mixed with other materials.

Assessor Evaluation and Conclusion (filled by auditor):
Verification on May 3, 2019

The certificate holder shows proof of improvement in the form of Minutes of Transfer of Agrochemical Binturung Estate on February 15, 2019. The document explains that type pesticide of *Kencepat* 10.5 kg and *Asefat* Manthane 75 SP 47 kg has been moved from general warehouse to agrochemical warehouse.

Verification on May 9, 2019

The certificate holder shows proof of improvement in the form of minutes of socialization on the use of PPE and warehouse for pesticide Rampa Estate on 16 February 2019 to 3 participants. In the minutes explained about storing chemicals in the Agrochemical Warehouse separately without being mixed with other materials.

Verification on May 10, 2019

The certificate holder shows proof of improvement in the form of socialization of agrochemical storage to 3 participants at Binturung Estate on February 15, 2019 along with the results of the evaluation.

The evidences had been verified and accepted to be closed out and complied with observation.

Verified by : **Afiffuddin**

NCR No.	: 2019.07	Issued by	: Yudhi Yuniarto Tallutondok			
Date Issued	: 15 February 2019	Time Limit	: 14 May 2019			
NC Grade	: Major	Date of Closing	: 8 May 2019			
Standard Ref. & Requirement	: 4.7.2 A documented risk assessment shall be available and its implementation shall be recorded.					
Non-Conformance Description & Evidence observed (filled by auditor): Hazard Identification Risk Assessment and Risk Control <p>The company has a 2018 Hazard Identification Risk Assessment and Risk Control (HIRARC) evaluation document that describes the hazards, impacts, control measures and personal protective equipment for each job. However, based on the results of document verification there are several activities that have not identified potential hazards, for example, but not limited to:</p> <ul style="list-style-type: none"> • FFB forming on trucks, based on the results of field observations in Division 2 of Pondok Labu Estate. • Activities for storing PPE and carrying PPE home by pesticide applicator, fertilizers and harvesting tools, this is based on observations and interviews with Pondok Labu Estate pesticide applicator, Rampa Estate and Sesulung Estate fertilizer employees. <p>In addition, based on field observations, it was found that implementation was not in accordance with the HIRARC documents owned by the company, for example</p> <ul style="list-style-type: none"> • Harvesters have been given PPE at Rampa Estate but PPE (helmet) is not used when working. • Warehouse officers were given appropriate PPE on Rampa Estate but PPE was not used when entering the pesticide warehouse • The employees of Binturung Estate fertilizer do not use PPE (gloves and masks) that have been given • Rampa Estate sprayers use masks that are not in accordance with the standards of the company that has been given • The boiler operator does not use a mask when refueling (inserting fiber into a fuel supplier) 						
Root Cause Analysis (filled by organization audited): <ul style="list-style-type: none"> • HIRAC for FFB loader is available in the HIRAC document in 2018 which is incorporated in the Harvest and Loader HIRAC but does not include safe storage of Harvesting Equipment and does not include storage of spray PPE and fertilizer in HIRAC. • Storage of PPE is not placed in the BSS house because PPE storage is not yet available. • The discipline of RPE harvesters, RPE Warehouse Officers, BNE Fertilizer Employees and PLF Boiler Operators in using PPE is still lacking, because PPE has been brought to the field but when not working. 						
Correction (filled by organization audited): <ol style="list-style-type: none"> 1. HIRAC socialization of transporting FFB at PLE 2. Storage of PPE at the BSS house by PLE, SSE and RPE (attached) 3. Socialization of PPE to RPE harvesters 4. Socialization of the use of PPE to RPE warehouse officers 5. Socialization of the use of PPE fertilizer packaging at BNE 6. Socialization and administration of spray PPE in RPE 7. Socialization of HIRAC to PLF boiler operators 8. Evaluation of HIRAC about Harvesting, Load FFB, Spray and Fertilizer including safe storage of PPE and PPE. 						
Corrective Action (filled by organization audited): <ol style="list-style-type: none"> 1. Assistant always ensures HIRAC is evaluated every year 2. Procurement and storage of PPE in accordance with procedures and potential hazards in HIRAC 						

3. Assistant to monitor daily PPE usage before work

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

Auditor Verification, May 8, 2019

The company shows some evidence of improvement including:

1. Socialization of the use of PPE for harvest, spray, upkeep and transportation of FFB employees with a total of 103 people on February 9, 2019 located in Division 1 of Rampa Estate. Available documentation, material and attendance list for the training.
2. Socialization of the use of PPE for employees of fertilizer with a total of 2 people on March 5, 2019 located in Division 1 of Rampa Estate. Available documentation, material and attendance list for the training.
3. Socialization of the use of PPE for boiler station employees with a total of 5 people on February 19, 2019 located at PLF boiler station. Available documentation, material and attendance list for the training.
4. Socialization of the use of PPE for employees of the RPE chemical warehouse with a total of 3 people on February 16, 2019 at the Central Rampa Estate Warehouse. Available documentation, material and attendance list for the training.
5. Documentation of the storage of PPE for PLE spray employees equipped with the locker number of each employee.
6. Documentation of the storage of PPE for SSE spray employees who have been equipped with the locker number of each employee.
7. Documentation of the storage of PPE spray employees who have been equipped with the locker number of each employee.
8. Evaluation of HIRAC regarding Harvest and Load of FFB, Spray and Fertilizers including safe sealing of Tools and PPE.

The evidences had been verified and accepted to be closed out and complied.

Verified by : Yudhi Yuniarto Tallutondok

NCR No.	: 2019.08	Issued by	: Yudhi Yuniarto Tallutondok
Date Issued	: 15 February 2019	Time Limit	: 14 May 2019
NC Grade	: Recurring Major	Date of Closing	: 8 March 2019
Standard Ref. & Requirement	4.7.3 Records of Occupational Health and Safety (OHS) program (see 4.8) and Personal Protective Equipment (PPE) training in accordance with the result of hazard identification and risk analysis shall be available to all workers.		

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

The company has a Personal Protective Procedure with number 739 / TQEM-ESH / 10 dated November 1, 2016. In point 6.1, some things are explained as follows:

- PPE must be replaced as soon as it is found that it does not guarantee protection.
- Except PPE Shoes will be given once a year according to the budget set by the management unit.
- For the replacement of PPE Shoes that are damaged before one year must meet the requirements, for example: report to the boss, submit evidence of shoes that are damaged, damage due to use for work and chronological delivery of care and storage. If it is correct, a replacement will be made.

Based on the results of field observations and interviews with employees in the estate and mill found the application of PPE procedures that have not been maximized for example:

- WTP operators use safety shoes in damaged condition
- Evidence of the distribution of PPE was shown, but during field observations, FFB loader Division 2 PLE mentioned that shoes were purchased alone because there was no replacement of damaged PPE from the company, interviews

with harvesters in block D15 Division 2 mentioned that boots were used to buy themselves and interviews with spray and IPM employees said that shoes were bought by themselves

- FFB loaders in Division 3 SSE do not use helmets and shoes provided by the company.
- Interview with a pesticide applicator at the RPE stated that PPE shoes bought themselves
- Interview with upkeep worker Division 3 BNE states that shoes are provided once a year, if damaged can not be exchanged and bought alone

Interviews with the Department of Manpower and Transmigration of Kotabaru Regency are known that the company can arrange the schedule for PPE to be given to employees, but companies are required to provide PPE to employees when employees work for free.

Based on the evidence above, the company has not been able to demonstrate the implementation of the use and provision of PPE in accordance with the procedures and applicable regulations (Regulation of the Minister of Manpower and Transmigration No. 8 of 2010).

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

- The company has not routinely conduct the socialization of replacement mechanism of damaged PPE to employees.
- Lack of concern for supervision in the use of PPE by employees.
- Employees are not aware of any damaged PPE replacement procedures.

Correction *(filled by organization audited):*

- Socialization to all employees regarding the mechanism of PPE replacement.
- Carry out daily identification / examination before work on the suitability and feasibility of using PPE.
- Replace damaged employee PPE.

Corrective Action *(filled by organization audited):*

- Conduct regular and comprehensive socialization to employees related to PPE replacement procedures.
- Carry out daily routine checks of employee PPE before working (documented) to ensure employees work using good and appropriate PPE.
- Provide a stock of PPE in the central warehouse to replace damaged employee PPE.
- Give multi-level sanctions to employees who do not use PPE in accordance with the gifts and standards set by the company.

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

Major Verification March 4 - 7, 2019

- Document Verification
When a major verification is carried out, the company shows evidence of improvements that have been made in each unit as follows:
Binturung Estate
 1. PPE socialization for Division I employees on 12 February 2019 at the division office yard and was attended by 65 participants.
 2. PPE socialization for Division II employees on 12 February 2019 at the division office yard and was attended by 89 participants.
 3. PPE socialization for Division III, IV and Nursery employees on February 16, 2019 at the division office yard and attended by 176 participants
 4. Division II, III and Nursery Daily PPE Inspection Form Period February 2019 for harvest work, upkeep and transportation of FFB.
 5. Minutes of the transfer of 10 pieces of PPE to Division III fertilizer employees on March 5, 2019
 6. Minutes of transfer 64 PPE replacements (apron, mask, rubber gloves and boots) to upkeep employees on February 16, 2019
 7. Minutes of transfer 37 PPE (helmet and shoes) to harvester on 18 February 2019.
 8. PPE Stock dated March 5 2019 eg 12 pcs masks, 10 pairs of rubber gloves, 10 pcs apron, 11 pairs of boots, and safety helmets 52 pcs

Rampa Estate

1. PPE socialization for Division I employees on February 9, 2019 at the division office yard and was attended by 103 participants.
2. PPE socialization for Division II employees on 13 February 2019 at the division office yard and was attended by 113 participants.
3. PPE socialization for Division III employees on February 16, 2019 at the division office yard and was attended by 125 participants.
4. Division I, II and III Daily PPE Inspection Form for February and March 2019 periods for harvest work, upkeep and transportation of FFB.
5. Minutes on the handover of the PPE replacement (yellow helmet) for 39 pieces to harvest workers, upkeep and transportation of Division I FFB on March 4, 2019.
6. Minutes of transfer of 9 pieces of PPE to employees of Division I harvester on March 4, 2019.
7. Minutes of transfer of PPE (masks and shoes) to 5 employees to Division II spray worker on March 5, 2019.
8. Minutes on the handover of the PPE replacement for 9 pieces of PPE (sunglasses and rubber gloves) to spray worker on February 27, 2019.
9. Minutes of the transfer of 10 pieces of PPE to division supervision on March 6, 2019.
10. PPE Stock dated March 5, 2019 for example 41 pcs masks, 44 pairs of cloth gloves, 13 pairs of rubber gloves, 30 pairs of safety glasses, 65 pcs apron, 132 pairs of boots, and 36 pcs safety helmet

Sesulung Estate

1. PPE socialization for Division I employees on 18 February 2019 at the division I office yard and was attended by 27 participants
2. PPE socialization for Division II employees on February 19, 2019 at the division II office yard and was attended by 24 participants
3. PPE socialization for Division III employees on February 20, 2019 at the division III office yard and was attended by 29 participants
4. PPE socialization for Division IV employees on February 21, 2019 at the division IV office yard and was attended by 90 participants
5. Daily PPE Inspection Form February 2019 Period for harvesting, upkeep and transport of Division I, II, III and IV.
6. Minutes on the handover of the PPE replacement for 31 apron, 33 pcs of masks and 31 pcs of gloves to employees on February 9, 2019.
7. Stock PPE dated March 5, 2019 for example 11 pairs of rubber gloves, 50 pcs apron, 27 pairs of boots, and 37 pcs safety helmet

Pondok Labu Estate

1. PPE socialization for Division I employees on 18 February 2019 at the division I office yard and was attended by 81 participants
2. PPE socialization for Division II employees on February 16, 2019 at the division II office yard and was attended by 103 participants
3. PPE socialization for Division III employees on February 16, 2019 at the division III office yard and was attended by 78 participants
4. PPE socialization for Division IV employees on February 16, 2019 at the division IV office yard and was attended by 39 participants
5. Daily PPE Check for the February 2019 Period for harvesting, upkeep and transport of Division I, II, III and IV.
6. Minutes on the handover of the PPE replacement for 29 pcs of PPE (apron) to spray employees on 11 February 2019.
7. Minutes on the handover of the PPE replacement for 29 pcs of PPE (mask) to spray employees on 11 February 2019.
8. Minutes on the handover of the PPE replacement for 29 pcs of PPE (rubber gloves) to spray employees on 11 February 2019.
9. Minutes on the transfer of PPE (helmet and boots) to 1 employee FFB loaders on February 14, 2019.
10. Minutes of the transfer of 17 pairs of PPE to harvesters and FFB loader on February 18, 2019.
11. Minutes of the transfer of PPE (boots) totaling 90 people to harvester workers on February 18, 2019.
12. PPE Stock dated March 5, 2019 for example 4 pcs mask, 37 pairs of rubber gloves, 4 pcs apron, 41 pairs of boots, and 48 pcs safety helmet.

Pondok Labu Factory

1. PPE socialization for process employees on February 19, 2019 at the factory office yard and was attended by 71 participants
 2. Daily PPE Check for the February 2019 Period from the FFB reception station to the process.
 3. Minutes of transfer of PPE (safety shoes) as many as 1 pair to WTP operators on March 5, 2019.
 4. PPE Stock dated March 5, 2019 for example 48 pcs mouth masks, 12 pairs of cloth gloves, 100 pcs ear plugs, 20 pairs of safety shoes, and 48 pcs safety helmets.
- Field observations and interviews with employees
During major verification activities, the auditor conducts field observations and interviews with employees throughout the unit at random as follows:
 1. Harvesting on Block C16 / 17 Division 1 Binturung Estate.
 2. Circle Racking on Block G28 Division 3 Binturung Estate.
 3. Central warehouse of Binturung Estate
 4. Circle and Path Spraying on Block K21 / 22 Division 2 Rampa Estate.
 5. Circle Racking on Block L32 Division 3 Rampa Estate.
 6. Central warehouse of Rampa Estate.
 7. Grading station at Pondok Labu Factory.
 8. Sterilizer station at Pondok Labu Factory.
 9. Thresher station at Pondok Labu Factory.
 10. Nut and kernel station at Pondok Labu Factory.
 11. Press station at Pondok Labu Factory.
 12. Central warehouse of Pondok Labu Factory.
 13. Harvesting on Blok D44 Division 2 Pondok Labu Estate.
 14. Loose Fruit Collection on Block E51 Division 3 Pondok Labu Estate.
 15. FFB Loading on Blok J20 / J21 Pondok Labu Estate.
 16. Central warehouse of Pondok Labu Estate
 17. Circle Racking on Blok L51 Division 1 Sesulung Estate.
 18. Circle and Path Spraying on Block L17 Division 2 Sesulung Estate.
 19. Circle Racking on Blok N37 Division 2 of Sesulung Estate.
 20. Circle Racking on Block S43 Division 4 Sesulung Estate.
 21. Central warehouse of Sesulung Estate.

Based on the results of field observations and interviews with employees it is known that employees have understood the procedure for giving and replacing PPE, this has been conveyed by the company through socialization at the morning briefing with employees. It was further explained that the company had also begun conducting PPE checks before work to ensure the conditions and suitability of PPE used by employees at work.

Based on the results of document verification, field observations and interviews with employees it was known that the company had taken corrective actions including socializing to employees related to PPE replacement procedures, conducting employee PPE every day and providing PPE stock in the central warehouse as PPE replacement supplies. This is in line with the results of field observations and interviews with employees stating that the company has socialized the mechanism of PPE replacement and has been understood by employees, in addition employees also explained that the company had begun conducting PPE examinations before work to ensure the condition and suitability of PPE used by employees at work. **The evidences had been verified and accepted to be closed out and complied.**

Verified by : **Yudhi Yuniarto Tallutondok**

NCR No.	2019.09	Issued by	Yudhi Yuniarto Tallutondok
Date Issued	15 February 2019	Time Limit	ASA 1.3
NC Grade	Minor	Date of Closing	

Standard Ref. & Requirement	4.7.5 A procedure for emergency and work accident shall be available in Indonesian Language; and the workers, who have attended First Aids training, are available in the working areas.
<p>Non-Conformance Description & Evidence observed (filled by auditor):</p> <p>Emergency Response The company has emergency procedures as follows:</p> <ol style="list-style-type: none"> 1. Procedure for emergency response No. PSA/ SOP.PD SOP document dated 1 December 2010 describes the steps to be taken in the event of an emergency. 2. Procedure Number 7302 / PSQM-ESH / 14 07/08/14 was approved by Head Plantation Upstream Indonesia concerning Guidelines for Fire Prevention and Management. <p>Based on the results of field visits it is known that the implementation has not been in accordance with the procedure, as follows:</p> <ul style="list-style-type: none"> • Installation of Fire Extinguisher at Pondok Labu Factory is not right in some places, for example in Central Warehouse on a pole with 125 cm above and the station loading ramp does not have a symbol of the place where Fire Extinguisher is located. • Hydrant type fire extinguishers are not in standby condition, based on simulations and observations made by the auditor there is no hose in the Hydrant box. • Installation of Fire Extinguisher that is not yet right at the Fuel Filling Station and Warehouse Estate Area (there is no marker on the location of the Fire Extinguisher). • Fire Extinguisher in non-pressurized conditions and not ready to be used in the Daycare Division 2 Binturung Estate. <p>First Aid Kit</p> <ol style="list-style-type: none"> 1. The company has an OHS First Aid Accident Procedure and First Aid Kit with the number P3K-01 dated December 1, 2015. In the procedure, a list of drugs is recommended for carrying the field with a total of 12 items. 2. Evaluation of the PT Paripurna Swakarsa First Aid Kit Box in 2018 by a company doctor, which explains the list of drugs recommended for carrying the field with 12 items. <p>Based on the results of field observations found that implementation is not in accordance with the procedure for example:</p> <ul style="list-style-type: none"> • There are 2 items in the first aid box which are expired, namely betadine and rivanol in the PLE fire extinguisher. • First aid kit for foreman in Sesulung Estate contained 10 items without a table of contents and monitoring • First aid kit without contents in Binturung Estate daycare • First aid kits in the office of the Binturung Estate division contain no more than 12 items (according to the list) and there is no monitoring of usage. • First aid kits in the Binturung Estate warehouse office do not have up to 12 items (according to the list) and there is no usage monitoring <p>Based on the explanation of the evidence above, it is known that the company has not been able to show evidence that the handling of emergencies and first aid has been implemented and monitored its effectiveness in accordance with the procedures owned.</p>	
<p>Root Cause Analysis (filled by organization audited): Monitoring fire facilities (fire extinguisher and hydrant) and first aid kits in the field have not yet proceeded according to the procedure.</p>	
<p>Correction (filled by organization audited):</p> <ol style="list-style-type: none"> 1. Fire Extinguisher has been installed that matches 125 cm in PLF with Fire Extinguisher symbols and numbers 2. The hose of the fire hydrant which was previously stored in the warehouse has been re-installed because it is repainting the hydrant box at PLF 	

3. Fire Extinguisher installation has been carried out in the RPE and is equipped with inspection monitoring up to April 2019
4. Fire Extinguisher has been replaced on March 5, 2019 at BNE div 2
5. Has a first aid kit in the PLE fire extinguisher in April 2019
6. The fulfillment of the contents of the First Aid Box in March 2019 at SSE
7. First Aid Box filling has been carried out at daycare, division office and BNE warehouse in March 2019

Auditor's response May 3, 2019

There are no corrective actions for:

- First aid kits in the office of the Binturung Estate division contain no more than 12 items (according to the list) and there is no monitoring of usage.
- First aid kits in the Binturung Estate warehouse office do not have up to 12 items (according to the list) and there is no usage monitoring

Corrective Action (filled by organization audited):

The safety officer always checks and replaces if there is a Fire Extinguisher and First Aid Kit void.

Auditor's response on May 3, 2019

Corrective action is still very general in nature, the company can re-analyze it specifically in order to guarantee that non-conformity will not be repeated in the future.

Assessor Evaluation and Conclusion (filled by auditor):
Auditor Verification May 3, 2019

The company shows some proof of improvement as follows:

1. Documentation of fulfilling the contents of the first aid kit at the Central Warehouse PLE
2. Documentation of fulfilling the contents of the first aid kit in the PLE Fire Extinguishers Warehouse
3. Documentation of fulfilling the contents of the first aid kit in SSE Foreman.
4. Documentation of fulfilling the contents of the first aid kit in Daycare Division 2 BNE
5. Documentation of filling the hydrant box at PLF
6. Documentation of installation of tube Fire Extinguisher in Central PLF Warehouse
7. Documentation of Fire Extinguisher tube installation in Daycare Division 2 BNE
8. Documentation of installation of Fire Extinguisher tubes in the Rampa Estate area.

The evidences had been verified and accepted to be closed out and complied.

Verified by : Yudhi Yuniarto Tallutondok

NCR No.	: 2019.10	Issued by	: Sandra Purba
Date Issued	: 15 February 2019	Time Limit	: 14 May 2019
NC Grade	: Major	Date of Closing	: 11 May 2019
Standard Ref. & Requirement	5.2.2 Where rare, threatened or endangered (RTE) species and or other HCVs are present or affected by the plantation and mill operations, an appropriate measures that are expected to maintain or enhance them shall be implemented through a management plan		
Non-Conformance Description & Evidence observed (filled by auditor):			
The company has compiled plans for the management of HCV areas and RTE species (rare, threatened, endangered) for the 2018-2019 period, one of which is the installation of HCV signboards, installation of hunting ban signboards and installation of signboards for protected species.			
On field observations to the PLE HCV area (the riparian of the Pondok Labu river and Separe river), to the HCV area			

at BNE (the Binturung River Basin, Sopan Tempuro spring, Niko water spring) and the swamp area in RPE it was seen that the company had not installed a signboard of HCV marking and signboard of warning/ban for HCV area. Furthermore, based on field observations to the HCV area in Niko water spring, observed traces of chemical spraying that cross the buffer zone.

Based on these, the company has not shown evidence of management has in accordance with the HCV management plan specified.

Root Cause Analysis (filled by organization audited):

The signboard has been damaged and still waiting for a new replacement, the buffer zone boundary markers has faded, so that the sprayers do not know the the border of spray application.

The monitoring of signboard and border marker not done thoroughly to entire HCV area

Correction (filled by organization audited):

1. In PLE, HCV boundary marking has been carried out with yellow paint in the main buffer zone.
2. At BNE on 2 April, HCV signboards were installed on the Binturung River, Niko spring well and Sopan spring well.
3. In the RPE a HCV 1.4, sign board has been installed as well as a warning sign.
4. HCV socialization has been carried out to employees at the RPE
5. HCV socialization has been carried out to employees at PLE

Corrective Action (filled by organization audited):

Safety officer always checks and replaces if there is damage to the HCV signboard, carry out according to the scheduled HCV monitoring program

Assessor Evaluation and Conclusion (filled by auditor):

Verification on May 2, 2019,

The company has submit the correction evidence, namely the documentation of HCV signboard placement in Sopan and Niko Well as well as in Binturung River.

Verification on May 8, 2019

The company has shown evidence namely:

- Evidence of training and socialization of HCV of PLE on May 6, 2019 which was attended by 39 participants. In the socialization, it was explained about hunting, poisoning, fishing, damaging the environment and socializing the protection of protected animals.
- Program for maintenance and monitoring of PT PSA's HCV and Buffer zone in 2019. The program including flora and fauna monitoring, signboard installation, maintenance and monitoring, bufferzone boundary painting planned to be carried out in June and December 2019, socialization to employees carried out every morning roll-call.

Verification on 11 May 2019,

The company shows the evidence including:

- Evidence of dissemination of HCVs to employees at the BNE on 10 May 2019 and at PLE on 10 May 2019 (participants of 20 people).
- Evidence of evaluation of HCV on May 10, 2019 to spraying employees at RPE, PLE and BNE, which explained that all employees understood well.
- Management plan and monitoring plan of PT PSA 2019 HCV management, which informs the organization chart, HCV area map and HCV detailed management plan and monitoring area plan (explains: estate, HCV type, block location, object, management objectives, threat identification, action management, monitoring and benchmark for success)

Based on the evidence mentioned above, nonconformities are stated to be fulfilled and will be observed on ASA 1.3. (close with observation).

Verified by : **Sandra**

NCR No.	: 2019.11	Issued by	: Yudhi Yuniarto Tallutondok
Date Issued	: 15 February 2019	Time Limit	: 14 May 2019
NC Grade	: Major	Date of Closing	: 10 May 2019
Standard Ref. & Requirement	: 5.3.2 There shall be evidence that all chemicals and their empty containers are disposed of responsibly		
Non-Conformance Description & Evidence observed <i>(filled by auditor):</i> The Company has a Procedure for B3 and Non-B3 Waste Management with the number PLB3 & BB3 dated March 4, 2009. In the procedure, it is explained that the storage of toxic and hazardous waste refers to applicable legal requirements, including packaging requirements, storage procedures, building requirements and requirements submission of toxic and dangerous waste material to third parties. Based on the results of field observations in plantations and factories it was found that the implementation of management of toxic and hazardous waste materials that are not suitable, for example: <ul style="list-style-type: none">• Ex oil containers used as rainwater storage in the WWTP Area.• Ex oil containers, used oil, and generator filters placed behind the Engine Room.• Ex pesticide containers and used oil containers in the Housing Division 4 of Pondok Labu Estate• Ex pesticide containers in front of the Sesulung Estate Chemist Warehouse.• Ex pesticide containers in the Sesulung Estate Fuel Warehouse.• Containers of used oil are used as water reservoirs at the Sesulung Estate Generator Set House• Container for taking oil behind the Sesulung Estate Genset House• Ex tin cans and used filters in the Rampa Estate Welding Site• Packaging of toxic and hazardous materials in the Warehouse of the Binturung Estate Division.• Used oil containers in Contractor Employee Housing at BNE Div 2.• Used oil containers in front of the Binturung Estate Generator Room. Based on the above evidence, the company has not been able to show evidence of the implementation of management of toxic and hazardous waste material that has been carried out in accordance with applicable procedures and regulations.			
Root Cause Analysis <i>(filled by organization audited):</i> The discipline of officers in the management and storage of ex packaging of toxic and hazardous materials has not gone well.			
Correction <i>(filled by organization audited):</i> <ol style="list-style-type: none">1. PLF, have taken ex oil containers at WWTP and placed in the Waste Storage Schedule2. PLF, transfer of ex oil containers, used oil and filters from the rear of the engine room to the Waste Storage Schedule has been carried out3. PLE, socialization of the management of toxic and hazardous waste has been carried out in PLE on 14 February 20194. SSE, Dissemination and management of toxic and hazardous waste packaging including packaging of pesticides in front of chemist warehouses, in fuel warehouses and oil containers in generator houses.5. RPE, socialization of toxic and hazardous waste management has been carried out and the minutes of taking the tin tin cans and used filters in the RPE6. BNE, Management of hazardous toxic materials and toxic and hazardous material waste in the warehouse has been carried out, ex oil containers in employee housing and ex oil containers in SSE generator sets7. Minutes of toxic and hazardous waste management in Division IV PLE			

8. Dissemination of Management of toxic and hazardous waste in PLF
9. Dissemination of Management of toxic and hazardous waste in the RPE

Corrective Action *(filled by organization audited):*

- Assistant / Safety officer always supervises the management of toxic and hazardous waste regularly.
- PLF ensures that the management of toxic and hazardous material is stored in the Waste Storage Schedule that has been monitored by the Safety Officer
- PLE is ensured that it routinely sends toxic and hazardous waste to the Waste Storage Schedule at the PLF once a month
- SSE is guaranteed to send toxic and hazardous material waste to the PLF a month or so
- BNE ensures that contractors do not store Ex oil drums and are sent to the Waste Storage Schedule

Assessor Evaluation and Conclusion *(filled by auditor):*
Auditor Verification May 8, 2019

The company shows some proof of improvement as follows:

1. Documentation of the transfer of ex-pesticide packaging from the Damkar Warehouse to the SSE waste storage schedule.
2. Documentation of transferring ex oil drum from the WWTP pond area to the PLF waste storage schedule.
3. Documentation of transferring ex oil drum from the engine room station to the PLF waste storage schedule.
4. Documentation of the transfer of ex-pesticide packaging from the division warehouse to the BNE waste storage schedule
5. Documentation of transferring oil-drained drums from the generator house to the BNE waste storage schedule
6. Dissemination of management of toxic and hazardous materials on February 14, 2019 located in Division 4 of PLF and attended by 88 employees. Available documentation, material and attendance lists related to the socialization.
7. Socialization of management of toxic and hazardous materials on March 14, 2019 at the Central SSE Warehouse and attended by 5 warehouse employees. Available documentation, material and attendance lists related to the socialization.
8. The socialization of the management of toxic and hazardous waste in RPE has long been carried out, namely on November 1, 2018
9. Socialization of management of toxic and hazardous material waste in RPE which was held on March 9, 2019 at the Second Division Lodge which was attended by 13 employees. Documentation, material and attendance list attached.
10. Socialization of management of toxic and hazardous materials at the PLF which was held on February 20, 2019, took place in the factory office yard which was attended by 63 operational employees. Documentation, material and attendance list attached
11. Minutes of handover of toxic and hazardous materials (ex oil drums and used paint cans) in the Division II RPE housing area on March 9, 2019. Toxic and hazardous materials are placed temporarily in the waste storage RPE schedule until the time of transportation to PLF waste storage schedule.
12. Minutes of handover of toxic and hazardous waste (ex oil drum and used pesticide packaging) in the Division IV PLE housing area on February 20, 2019. Toxic and hazardous waste materials are temporarily placed in the PLE waste storage schedule up to the time of transportation to PLF waste storage schedule.
13. Minutes of handover of toxic and hazardous materials (used pesticide packaging) at SSE generator house on May 2, 2019. Toxic and hazardous waste materials are temporarily placed in the waste storage SSE schedule until the transport time to the PLF waste storage schedule
14. Socialization of management of toxic and hazardous materials in the Division II BNE held on May 10, 2019 located in the division office yard which was attended by 25 operational employees. Documentation, material and attendance list attached
15. Socialization of management of toxic and hazardous material in Division III BNE held on May 10, 2019 located in the division office yard which was attended by 25 operational employees. Documentation, material and attendance list attached.
16. Minutes of handover of toxic and hazardous materials (used pesticides and used oil drums) from division warehouses, employee housing and generator houses on May 2, 2019. Toxic and hazardous waste materials are temporarily placed in the BNE waste storage schedule until transport time to the PLF waste storage schedule.

The evidences had been verified and accepted to be closed out and complied.

Verified by	: Yudhi Yuniarto Tallutondok
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NCR No.	: 2019.12	Issued by	: Yudhi Yuniarto Tallutondok
Date Issued	: 15 Februari 2019	Time Limit	: ASA 1.3
NC Grade	: Minor	Date of Closing	:
Standard Ref. & Requirement	: 5.3.3 A documented waste management plan to avoid or reduce pollution and its implementation shall be available.		
Non-Conformance Description & Evidence observed (filled by auditor):			
<p>The company has documented waste disposal and management plans in the Waste Source Identification document and in the applicable procedures for example:</p> <ol style="list-style-type: none">1. Procedure for the Prevention and Prevention of Spills of Leaked Toxic and Hazardous / Waste and WWTP with number 301 / PSA-KRD-17/11 dated January 2, 2011.2. Domestic Waste Management Procedure with SOP.DOM number dated October 1, 2013.3. Procedure for Managing Hazardous Toxic Waste and not with PLB3 & BB3 number dated March 4, 2009. <p>However, based on the results of field observations, it was found that the implementation of procedures was not yet appropriate, for example:</p> <ul style="list-style-type: none">• There is overflow in ponds of WWTP No. 1 and 2.• There is an ex oil spill in the WWTP area.• Oil spills at workshops and engine rooms at Division 4 Pondok Labu Estate• There are used oil spills in the welding machine room and waste storage schedule at Rampa Estate.• Domestic waste deposits in front of the Division 4 Pondok Labu Estate housing area• Domestic waste is piled up in front of housing in Sesulung Estate.• Waste is scattered and burned in the Binturung Estate housing estate.			
Root Cause Analysis (filled by organization audited):			
<p>The discipline of officers in the management of hazardous and domestic toxic waste is still poor, so it is not according to the procedure.</p>			
Correction (filled by organization audited):			
<ol style="list-style-type: none">1. IPAL no 1 & 2 pond overflow repairs have been carried out as well as oil spill cleaning in the IPAL PLF area2. Oil trap repairs have been carried out at the PLE generator house3. Cleaning of oil spills in the generator and RPE welding site has been carried out4. Improvements have been made with cleaning work and scheduling of domestic waste management in SSE housing5. The socialization of the ban on waste burning at BNE and domestic waste management has been carried out.			
Auditor's response May 3, 2019			
<ol style="list-style-type: none">1. Where is the land contaminated with oil and liquid waste planted?2. There is no evidence of repairs for oil spills in PLE workshops and domestic waste deposits in front of the division 4 housing area of Pondok Labu Estate			
Corrective Action (filled by organization audited):			
<p>The Assistant / Safety officer always supervises the management of hazardous toxic materials and domestic waste regularly.</p>			
Auditor's response May 3, 2019			
<p>Corrective action is still very general in nature, the company can re-analyze it specifically in order to guarantee that</p>			

non-conformity will not happen again in the future

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

Auditor Verification May 3, 2019

The company shows several improvements as follows:

1. Documentation of used oil spills and waste overflow cleaning in the WWTP PLF area.
2. Documentation of used oil spill cleaning on a PLE engine room.
3. Documentation of cleaning oil spills in engine rooms, welding sites and temporary waste storage Rampa Estate schedules.
4. Employee cottage improvement program and waste management in the SSE period 2019
5. Socialization is prohibited from burning trash to residents of BNE employee housing on March 5, 2019. There is documentation, material and attendance list for socialization.

The evidences had been verified and accepted to be closed out and complied.

Verified by : Yudhi Yuniarto Tallutondok

NCR No.	: 2019.13	Issued by	: Rizliani Aprianita Hsb
Date Issued	: 15 February 2019	Time Limit	: 14 May 2019
NC Grade	: Major	Date of Closing	: 11 May 2019
Standard Ref. & Requirement	: 6.3.2 There shall be records of process and outcome of dispute resolution.		

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

Based on the results of observations to the housing in division 2 of Binturung Estate, it was found that workers and housing residents had complained about improvements to housing facilities, but there had been no response or follow up on the complaint. In addition, the Binturung Estate unit only showed complaints for 2019 totaling 5 from division 1, division 3 and workshop and there was no response / follow-up. From 5 complaints, 4 of them have exceeded the deadline of 2 weeks / 14 days.

Based on the explanation above, it was concluded that there was not enough evidence that all workers' complaints had been documented and had been responded in accordance with the Complaints Handling Mechanism SOP for all parties & communities PT PSA No. document 077 / PSA / Stkl / 10/15, revision 01 dated October 7, 2015 which states that all complaints from the parties will be documented in the Aspiration Records book and responded not later than 2 weeks / 14 days.

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

Not yet responded to the employee's complaints in writing, so far only direct repairs to housing have been complained by the employees because employee's complaints submitted verbally to assistants and assistants immediately requested the need for housing repairs to Manager.

Correction *(filled by organization audited):*

Respond to employee complaints and record them in the complaint register.

Corrective Action *(filled by organization audited):*

Section Head will ensure that every complaint is documented and responds according to the procedure for handling complaints. And the way to ensure that complaints have been managed properly is to put them in the complaint register.

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

Auditor verification May 3, 2019

The company shows evidence of improvement in the form of:

- Letter No. ST / BNE / 03/2019 dated March 5, 2019 regarding the response of employee complaints in Binturung Estate along with the stuff demand bill. However, there was no information explaining to whom the letter was

intended and evidence that the worker had received a response to the complaint.

- In addition, the documentation of complaints and responses according to the SOPs for nonconformities above (the results of interviews in housing and verification of complaints documents) have not been shown.

Verification on May 10, 2019

The company shows evidence of improvement in the form of:

- Register of workers complaints for Binturung Estate. In the register book contains the date, complaint, statement and initial. However, the record does not contain the time / date of the response to the complaint and evidence that the response was submitted to the worker. For example, Complaints dated January 5, 2019 related to leaky housing roofs, with information; process for roof purchasing. (There is no date for the response and evidence of response has been submitted to the worker).

Verification on May 11, 2019

The company shows evidence of improvement in the form of:

- Register of workers complaints for Binturung Estate that contain the date of complaint, type of complaint, statement, initial and response. From the register, it contains the date of response and how to submit responses to workers.
- Letter No. ST / BNE / 03/2019 dated March 5, 2019 concerning Responses Complaints from all employees to Binturung Estate (including housing complaints) submitted to Foreman dated March 6, 2019 and delivered to employees during the morning briefing.

The evidences had been verified and accepted to be closed out and complied. (closed with Observation)

Verified by : Rizliani Aprianita Hsb

NCR No.	:	2019.14	Issued by	:	Rizliani Aprianita Hsb
Date Issued	:	15 February 2019	Time Limit	:	Next Surveillance
NC Grade	:	Minor	Date of Closing	:	
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.			
Non-Conformance Description & Evidence observed <i>(filled by auditor):</i> Observation result of the housing division 2 of Binturung Estate known that many damaged houses, especially bathrooms / toilets / kitchens, many households trenches had clogged and non-flowing conditions, septic tank of the division II office was damaged with water from the septic tank inundated. Related to this, the company has not been able to show evidence of providing adequate and healthy housing facilities for employees.					
Root Cause Analysis <i>(filled by organization audited):</i>					
Correction <i>(filled by organization audited):</i>					
Corrective Action <i>(filled by organization audited):</i>					
Assessor Evaluation and Conclusion <i>(filled by auditor):</i>					
Verified by	:				

NCR No.	: 2019.15	Issued by	: Sandra Purba
Date Issued	: 15 February 2019	Time Limit	: 14 May 2019
NC Grade	: Major	Date of Closing	:
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).		
Non-Conformance Description & Evidence observed (filled by auditor): In ASA 1.2, the company can show the document of Chronology of LUCA submission by SDP, update until Jan 2019 where the company has sent LUCA reports to RSPO (19 reports) along with shape files in August 2018, in October 2018 the RSPO has responded to require clarification. Based on PT MAL's communication with RSPO on February 13, 2019, the RSPO stated that currently the LUCA status for PT PSA is still awaiting finalization and clarification from SDP Berhad. Based on the above explanation, the company has not been able to show the completion and approval process of RSPO for the RaCP for PT PSA.			
Root Cause Analysis (filled by organization audited): The unit has not received information from Sime Darby regarding the progress of RaCP of PT PSA			
Correction (filled by organization audited): Communication to Sime Darby HQ and RSPO. It has been shows a timeline checklist of submission LUCA Sime Darby			
Corrective Action (filled by organization audited): Continuously communicate to RSPO regarding to the RaCP process for units under Sime Darby, specifically PT PSA			
Assessor Evaluation and Conclusion (filled by auditor): Verification on May 11, 2019, The company has shown evidence of communication with the RSPO Secretariat in May 09, 2019 which informed that a meeting had been held with the RSPO on May 8, 2019, at the meeting agreed: <u>Considering the historical involvement and events (as presentation slides and documents attached), SDP is given a one year time extension period to address all outstanding matters (including the approval of compensation plan) related to non-conformity raised on 7.3.1 during the RSPO Re-certification/Annual Surveillance Audits for the affected units. (The timeframe of one year whether from May 2019 or maybe staggered according to the certification dates of each Unit of Certification will be advised by RSPO Secretariat.)</u> . Based on email from RSPO Secretariat (aminah.ang@rspo.org) dated 23 May 2019 stated that "The RSPO secretariat has agreed to allow the NC raised on 7.3.1 to Sime Darby's units to be opened until the next ASA"			
Verified by	: Sandra Purba		

3.5.3 Opportunity for Improvement

No	Ref. Std.	Description Deskripsi
1	Minor 2.2.2	Follow-up on the results of monitoring the HGU boundary for the entire estate
2	Minor 4.7.6	The company has the opportunity to monitor Social Insurance for contractor workers
3	Minor 5.1.3	Company has the opportunity to ensure the preparation of RKL-RPL documents in accordance with Minister of Environment Decree no. 45 of 2005
4	Minor 5.2.3	During field observations on workers housing in SSE and BNE, observed that there was employees were rearing the species included in CITES appendix II (least concern protection status), namely <i>Macaca fascicularis</i> and <i>Macaca nemestrina</i> , in this regard the company considered to improve the effectiveness monitoring and to improve the understanding of employees towards the protection of flora and fauna not limited to the RTE species only.
5	Major 6.5.1	Distribution of salary slips to workers which inform details of wages
6	Major 6.9.1	The company has the opportunity to ensure the socialization of the gender committee
7	Major 8.1	Company has the opportunity to ensure that core work is carried out by permanent workers (P & C 2018
8	SCCS D.4.2	Reporting to CB for the production of certified products (production 12 months before the audit) that exceeds the stipulated projection and extends the volume projection for the remaining period of the license held.

3.5.4 Noteworthy Positive Components

No	Descriptions
1	Implementation of FFB loading using a mechanical system using crane grabber
2	The company's commitment not to use daily labor
3	Road improvement program with concrete system

3.6 Summary of Arising Issues from Public and Auditor Verification

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>13 February 2019 Manpower Regency of Kotabaru Regency (communication by phone)</p> <ul style="list-style-type: none"> • The company has complied with applicable regulations, and routinely sends mandatory reports to related agencies. • There are no negative issues in the company's operational areas such as: worker discrimination, child labor and forced labor. • The agency has collaborated with companies regarding OHS socialization. • The company has set a minimum wage in 2019 in accordance with the provisions of the Governor. • Collective Labor Agreement is still in the negotiation stage. • Worker union in each unit have been authorized and registered to Manpower Agency. • The OHS committee structure in each unit has been approved and has an OHS Expert. • Companies already have licensed operators, for example: boiler operators, diesel engine operators, electricians and welders. • The company routinely conducts annual checks on tools and machinery used in its operational area. 	<p>The points issues have been verified and describe to the criteria or indicator number 2.1, 4.7, 6.5, 6.6, 6.7, 6.8, 6.12.</p>
<p>14 February 2019 Replanting Contractor (PT BAL)</p> <ul style="list-style-type: none"> • The company has disseminated company policies related to the company's code of ethics and workers aged over 18 years. • Workers have been given PPE by contractors and companies. • The contractor has included workers in the labor and health social security program • The entire implementation of work and payment in accordance with the applicable agreement. • There are no complaints from contractors during the period of the employment agreement. • The company has carried out evaluations to contractors related to the fulfillment of social security and PPE for contractor employees. 	<p>The points issues have been verified and describe to the criteria or indicator number 4.7, 6.3, 6.5, 6.7, 6.8, 6.12.</p>
<p>14 February 2019 Minamas Plantation Worker Union (Binturung Estate, Pondok Labu Estate and Rampa Estate)</p> <ul style="list-style-type: none"> • The selection of administrators of union workers is based on the results of members voting without any intervention 	<p>The points issues have been verified and describe to the criteria or indicator number 1.2, 2.1, 4.7, 6.3, 6.5, 6.6, 6.7,</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>from the company.</p> <ul style="list-style-type: none"> There are no negative issues such as: discrimination of workers and workers under the age of 18, and sexual harassment. Payment of employee wages and overtime is in accordance with applicable regulations. All workers have been included in the labor and health social security program The company has conducted periodic health checks on workers at high risk of accidents. The company has conducted socialization regarding procedures for complaints of employee complaints and suggestion boxes. Collective Labor Agreements are still in the negotiation stage between companies and trade unions. The company has carried out socialization regarding human rights policies, codes of ethics and sexual harassment. Complaints related to damage to employees' homes have been submitted but received a slow response from the company. 	<p>6.8, 6.9, 6.12, 6.13</p>
<p>12 February 2019 Pondok Labu Village (Head of Village, Village Secretary and Community Leader)</p> <ul style="list-style-type: none"> The company has contributed to village development such as maintain the village roads, providing rice assistance to elderly and widowed residents and providing sacrificial animals assistance during Eid Al-Adha. Communication between companies and villages runs quite well. There are no issues of environmental pollution and land burning by the community in the company's operational area. There is no land dispute between the community and the company. The community has submitted an approval for the electricity line to the village but there was no response from the company The community questions 20% of plasma land for the company's HGU land which is still in progress. 	<p>The points issues have been verified and describe to the criteria or indicator number 2.1, 2.2, 2.3, 6.1, 6.2, 6.3, 6.4, 6.11</p>
<p>13 February 2019 Gender Committee (Sesulung Estate dan Binturung Estate)</p> <ul style="list-style-type: none"> The gender committee has developed a work program for 2019. The gender committee routinely disseminates information to female employees regarding the understanding of 	<p>The points issues have been verified and describe to the criteria or indicator number 6.9</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>gender committees and prohibits work from using chemicals for employees who are breastfeeding or pregnant.</p> <ul style="list-style-type: none"> • The gender committee has a database of female employees in each unit. • The company has regulated women's reproductive rights stated in the Collective Labor Agreement. • The company always facilitates and supports every activity carried out by the gender committee. • There were no violations related to sexual abuse or domestic violence within 1 year. • The company has a prenatal procedure for female employees who use chemicals and has been carried out properly. • Gender committees have submitted complaints to companies related to school buses that are often late and have been responded to by the company. 	

4.0 CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY**4.1 Formal Sign-off of Assessment Findings**

Hereunder sign by management representative from inspected company and audit team to acknowledge a field assessment and agree for all content explained in this assessment report, included of nonconformities issues.

Signed on behalf of:

PT Paripurna Swakarsa
Head of PSQM Sime Darby Plantation Bhd



Alagendran Maniam
Tuesday, 14 May 2019

Mutuagung Lestari
Lead Auditor



Sandra Purba
Tuesday, 14 May 2019

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

No	Institution/NGO/ Community	Address	Phone/Email	Form of Communication	Date of Contact	Response	
						Yes	No
1	Plantation Agency of Kotabaru District	District of Kotabaru	disbut_ktb@yahoo.co.id	Phone	14 th May 2019	√	
2	Wahana Lingkungan Hidup Indonesia	Indonesia	informasi@walho.or.id	Email	06 th Feb 2019		√
3	WWF	Indonesia	Supporter- service@wwf.or.id	Email	06 th Feb 2019		√
4	Greenpeace	Indonesia	Info.id@greenpeace.or.id	Email	06 th Feb 2019		√
5	Pondok Labu Village	Pondok Labu Village, Kotabaru Regency, Province of Kalimantan Selatan	-	Interview	14 th May 2019	√	
6	Minamas Plantation Worker Union (Binturung Estate, Pondok Labu Estate and Rampa Estate)	Pamukan Selatan, Kotabaru, Kalsel	-	Interview	14 th May 2019	√	
7	Replanting Contractor (PT BAL)	Pamukan Selatan, Kotabaru, Kalsel	-	Interview	14 th May 2019	√	
8	Gender Committee	Pamukan Selatan, Kotabaru, Kalsel	-	Interview	16 th May 2018	√	
9	2 harvester and 1 supervisor	Pondok Labu Estate	-	Interview	12 February 2019	√	
10	2 spraying workers and 2 supervisor	Pondok Labu Estate	-	Interview	12 February 2019	√	
11	1 sortation workers and 1 supervisor	Pondok Labu Factory	-	Interview	12 February 2019	√	
12	4 processing workers	Pondok Labu Factory	-	Interview	12 February 2019	√	
13	2 female circle raking worker and 1 supervisor	Sesulung Estate	-	Interview	13 February 2019	√	
14	3 female herbicide applicator and 2 male supervisor	Sesulung Estate	-	Interview	13 February 2019	√	
15	5 harvester and 2 supervisor	Binturung Estate	-	Interview	14 February 2019	√	

16	3 female herbicide applicator and 1 female supervisor	Binturung Estate	-	Interview	14 February 2019	√	
17	2 female manual weeding workers and 1 female supervisor	Binturung Estate	-	Interview	14 February 2019	√	
18	2 harvester and 1 supervisor	Pondok Labu Estate	-	Interview	12 February 2019	√	
19	6 sortation workers	Pondok Labu Factory	-	Interview	16 th May 2018	√	

Appendix 2. Assessment Program

DATE	11 to 16 February 2019	
Actual Time	PROCESS / CLAUSES TO BE AUDITED	AUDITOR
Monday, 11 Feb 2019		
05.20 – 08.35	Jakarta – Airport Balikpapan	SDP, RZA, YTT, AFF
09:00 – 09.30	Airport – Semayang Port Balikpapan	
10.00 – 23.30	Semayang Port – PT PSA	
Tuesday, 12 Feb 2019		
08.00 – 09.00	Opening meeting.	SDP, RZA, YTT, AFF
09.00 – 12.00	Field Observation to Pondok Labu Estate <ul style="list-style-type: none">• BPN pole’s and HCV• BMP (harvesting, FFB transportation, field upkeep, manuring, IPM, replanting area, nursery, soil and water management).• Worker facility (housing complex, traction or workshop, hazardous and hazardous waste warehouse, Clinique and fire fighter equipments).• Public consultation with Community of Village (Desa Pondok Labu)	SDP AFF RZA
12.00 – 14.00	Break	YYT SDP, RZA, YTT, AFF
14.00 – 16.00	Observation to Pondok Labu Mill <ul style="list-style-type: none">• Operational and SCCS (Security gate, weigh bridge, sortation, loading ramp, processing stations, boiler, engine room).• WWTP, hazardous and hazardous waste warehouse and management, WTP, workshop, hydrant simulation.	SDP / AFF YYT / RAZ
16.00 – 17.00	<ul style="list-style-type: none">• Review and Verification:<ul style="list-style-type: none">- Previous NCR previous assessment- Time Bound Plan- Basic Info• Document Verification.• Clarification of field observation and public consultation result	SDP, RZA, YTT, AFF
Wednesday, 13 Feb 2019		
08.00 – 12.00	Field Observation to Rampa Estate and Sesulung Estate <ul style="list-style-type: none">• BPN Pole(s) and HCV areas of PT PSA• BMP (harvesting, FFB transportation, field upkeep, manuring, IPM, replanting area, nursery, soil and water management).• Worker facility (housing complex, traction or workshop, hazardous and hazardous waste warehouse, Clinique and fire fighter equipments).	SDP AFF / YYT RZA
12.00 – 14.00	Break	SDP, RZA, YTT, AFF
14.00 – 16.45	<ul style="list-style-type: none">• Continuing field observation and stakeholder consultation (if any)• Public consultation (committee gender, labour union, contractor) → PLE, SSE, PLF• Document Verification• Clarification of field observation and public consultation result	YYT SDP, RZA, YTT, AFF
Thursday, 14 Feb 2019		
08.00 – 12.00	Field Observation to Binturung Estate <ul style="list-style-type: none">• BPN Pole(s) and HCV areas of PT PSA	SDP AFF

DATE	11 to 16 February 2019	
Actual Time	PROCESS / CLAUSES TO BE AUDITED	AUDITOR
12.00 – 14.00	<ul style="list-style-type: none"> BMP (harvesting, FFB transportation, field upkeep, manuring, IPM, replanting area, nursery, soil and water management). Worker facility (housing complex, traction or workshop, hazardous and hazardous waste warehouse, Clinique and fire fighter equipments). Public consultation to agency (by Phone) and interview with gender committee and Labour Union 	RZA
	Break	YTT
14.00 – 17.00	<ul style="list-style-type: none"> Continuing field observation and stakeholder consultation (if any) Document Verification. Clarification of field observation and public consultation result 	SDP, RZA, YTT, AFF
Friday, 15 Feb 2019		
08.00 – 12.00	<ul style="list-style-type: none"> Closing meeting preparation Closing meeting 	SDP, RZA, YTT, AFF
12.00 – 21.30	Travelling PT PSA – Balikpapan	SDP, RZA, YTT, AFF
Saturday, 16 Feb 2019		
10.00 – 11.00	Travelling from Balikpapan – Jakarta	SDP, RZA, YTT, AFF