

Roundtable on Sustainable Palm Oil Certification
R S P O

[✓] Surveillance

Name of Management : Lada Palm Oil Mill – Subsidiary of United Plantations Bhd
Organisation

Plantation Name : PT Surya Sawit Sejati: Lada Estate and Runtu Estate

Location : Village of Sungai Rangit Jaya, Sub District of Pangkalan Lada, District of Kotawaringin Barat, Province of Kalimantan Tengah, Indonesia

Certificate Code : **MUTU-RSPO/123**

Date of Certificate Issue : 27 November 2018 Date of License Issue : 27 February 2019

Date of Certificate Expiry : 26 November 2023 Date of License Expiry : 26 November 2020

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-1	07 to 11 October 2019	Trismadi Nurbayuto (Lead Auditor), Brigitta Prita, Haikal Ramadhan Kharismansyah & Satria Adi Putra.	Octo H.P.N. Nainggolan	Ardiansyah

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-1	09 January 2020

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Figure 1. Location Map of PT Surya Sawit Sejati

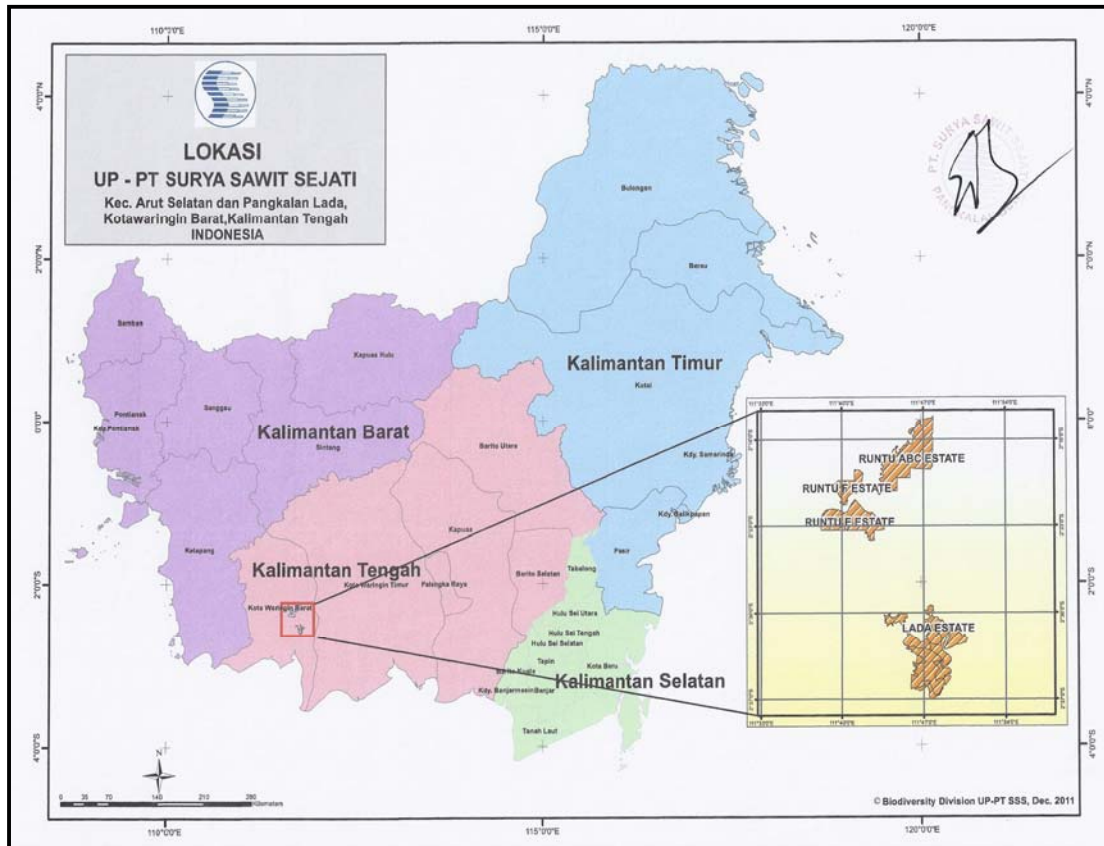


Figure 2. Operational Map of PT Surya Sawit Sejati (Lada Estate)

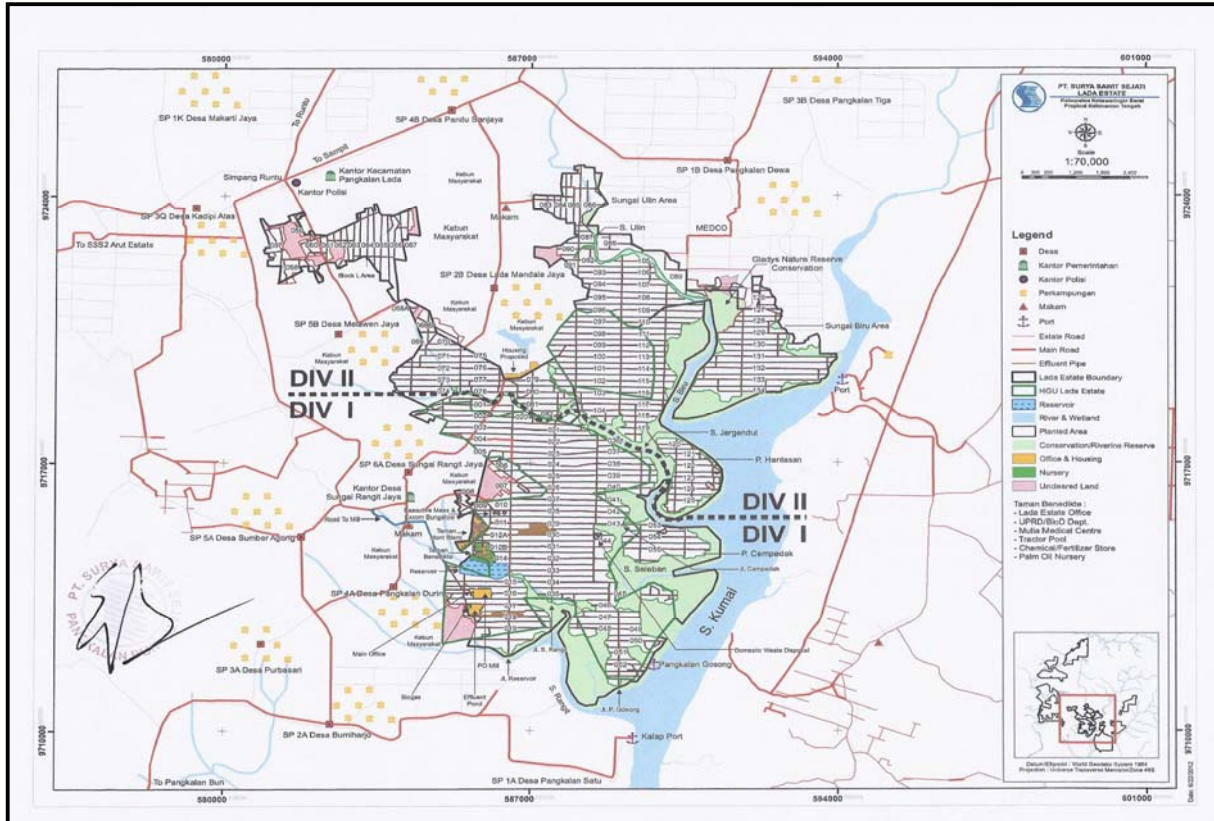
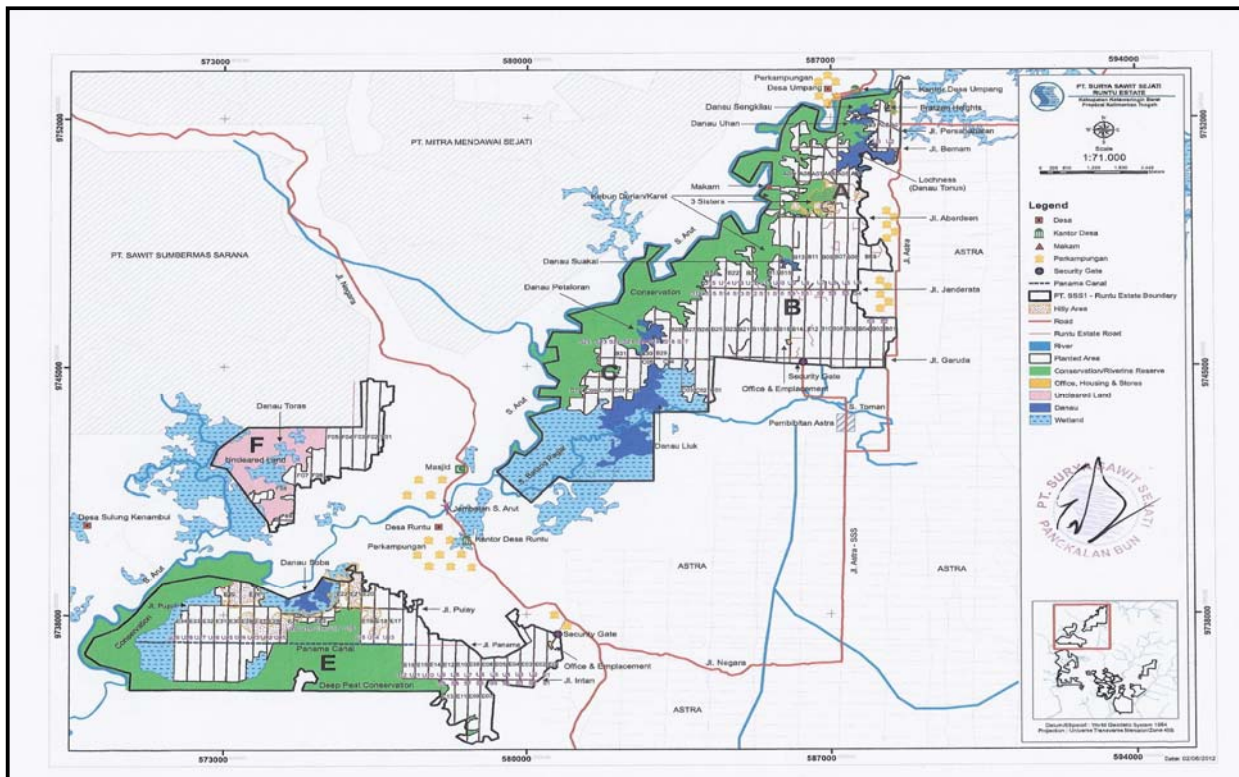


Figure 3. Operational Map of PT Surya Sawit Sejati (Runtu Estate)



Abbreviations Used

ASA	:	Annual Surveillance Assessment
BOD	:	Biological Oxygen Demand
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i> (Social Security Administrator)
BPJS TK	:	<i>Badan Penyelenggara Jaminan Sosial</i> Tenaga Kerja (Manpower Social Security Administrator)
BPJS Kes	:	<i>Badan Penyelenggara Jaminan Sosial</i> Kesehatan (Health Social Security Administrator)
CH	:	Certificate Holders
CPO	:	Crude Palm Oil
CSR	:	Corporate Social Responsibility
CV	:	<i>Commanditaire Vennotschap</i>
EFB	:	Empty Fresh Bunch
EIA	:	Environment Impact Assessment
FFB	:	Fresh Fruit Bunch
GHG	:	Green House Gasses
GIS	:	Geographical Information System
HCV	:	High Conservation Value
HGU	:	Hak Guna Usaha (<i>Land Use Tile</i>)
IPM	:	Integrated Pest Management
ISO	:	International Organization for Standardization
JAMKESDA	:	<i>Jaminan Kesehatan Daerah</i> (Regional Health Insurance)
KER	:	Kernel Extraction Rate
KHB	:	<i>Karyawan Harian Bulanan</i> (Permanent Employee)
KHL	:	<i>Karyawan Harian Lepas</i> (piece worker)
KHT	:	<i>Karyawan Harian Tetap</i> (Permanent Daily Employee)
LCC	:	Legume Cover Crop
LD50	:	Lethal Dosage 50
MCU	:	Medical Checkup
MT	:	Metric Ton
MSDS	:	Material Safety Data Sheet
NGO	:	Non Government Organization
OER	:	Oil Extraction Rate
OSH	:	Occupational Safety and Health
P2K3	:	Panitia Pembina Kesehatan dan Keselamatan Kerja (OHS Committee)
PIC	:	Person In Charge
PJK3	:	<i>Perusahaan Jasa Kesehatan dan Keselamatan Kerja</i> (Occupational Safety and Health Services Company)
PK	:	Palm Kernel
PKB	:	<i>Perjanjian Kerja Bersama</i> (collective labor agreement)
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PPE	:	Personal Protective Equipment
PT SSS	:	PT Surya Sawit Sejati
RSPO	:	Roundtable on Sustainable Palm Oil
RSPO INA-NIWG	:	RSPO Indonesia National Interpretation Working Group
SIA	:	Social Impact Assessment
SK	:	<i>Surat Keputusan</i> (Decree Letter)
SOP	:	Standard Operating Procedure
UMSP	:	Upah Minimum Sektor Perkebunan (Plantation Sectoral Minimum Wage)
UPT	:	<i>Unit Pelayanan Teknis</i> (Technical Service Unit)
WHO	:	World Health Organization
WTP	:	Water Treatment Plant
WWTP	:	Wastewater Treatment Plant

1.0 SCOPE OF THE CERTIFICATION ASSESSMENT			
1.1 Assessment Standard Used			
	<ul style="list-style-type: none"> Indonesian National Interpretation of RSPO Principles and Criteria (P&C) 2013 by INA-NITF July 2016, endorsed by the RSPO Board of Governors on September 30th 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 or E for CPO Mill) RSPO Certification System for Principles and Criteria, 14 June 2017 		
1.2 Organisation Information			
1.2.1	Organisation name listed in the certificate	PT Surya Sawit Sejati subsidiary of United Plantations Bhd	
1.2.2	Contact person	C. Mathews	
1.2.3	Organisation address and site address	RSPO registered company: Jenderata Estate 36009 Teluk Intan, Perak Darul Ridzuan, Malaysia Liaison Office: Sungai Rangit Jaya SP6 Village, Sub-district Pangkalan Lada, PO BOX 1017, District of Pangkalan Bun, Kalimantan Tengah Province 74101	
1.2.4	Telephone	+605 6411411	
1.2.5	Fax	+605 6411876	
1.2.6	E-mail	mathewsc6@gmail.com	
1.2.7	Web page address	www.unitedplantations.com	
1.2.8	Management Representative who completed the application for certification	C. Mathews	
1.2.9	Registered as RSPO member	1-0004-04-000-00, 19 July 2004	
1.3 Type of Assessment			
1.3.1	Scope of Assessment and Number of Management Unit	One (1) POM (Lada Mill) with two (2) supply bases (Lada Estate and Runtu 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
	Lada POM	Village of Sungai Rangit Jaya Sp. 6 Sub District of Pangkalan Lada, District of Kotawaringin Barat, Province of Kalimantan Tengah, Indonesia	S 02° 35' 27" E 111° 46' 21"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			Latitude Longitude
	Lada Estate	Village of Sungai Rangit Jaya Sp.6 Sub District of Pangkalan Lada, District of Kotawaringin Barat, Province of Kalimantan	S 02° 29' 35" E 111° 43' 23"

		Tengah, Indonesia					
	Runtu Estate	Runtu Village, Sub District of Arut Selatan, District of Kotawaringin Barat, Province of Kalimantan Tengah, Indonesia	S 02° 22' 31"	E 111° 41' 22"			
1.5 Description of Area Statement							
1.5.1	Tenure						
	• State (HGU & HGB)		6,743.90	Ha			
	• Community		-	Ha			
1.5.2	Area Statement						
	Total area		6,717.62	Ha			
	Mature area		4,011.13	Ha			
	Immature Area		-	Ha			
	Mill/Emplacement/Roads		118.83	Ha			
	Conservation area		2,587.66	Ha			
Source: hectare statement per October 2019, scope of certification is 6,717.62 Ha.							
1.6 Planting Year and Cycles							
1.6.1	Age profile of planting year						
	Planting Year	Hectarage (Ha)					
		Lada Estate	Runtu Estate	Total			
	2004	98.20	-	98.20			
	2005	501.98	-	501.98			
	2006	643.74	-	643.74			
	2007	1,069.46	-	1,069.46			
	2008	732.34	696.60	1,428.95			
	2009	-	268.81	268.81			
	TOTAL	3,045.72	956.41	4,011.13			
1.6.2	New Planting area after January 2010		-	Ha			
1.6.3	Planting Cycle		1 st Cycle				
1.7 Description of Mill and Supply Base							
1.7.1	Description of Mill						
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel	
				Out put (ton)	Extraction (%)	Out put (ton)	Extraction (%)
	Lada Estate	60	280,417.70	65,011.66	23.18	12,468.00	4.45
					*Processing data source October 2018 to September 2019		
1.7.2	Description of Certification Scope of Supply Base						
	Name of Estate	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/ year)	Supplied to Mill	
						FFB (tonnes/year)	%
	Lada Estate	713.47	650.53	14,447.56	22.21	14,447.56	100

	TOTAL	713.47	650.53	14,447.56	22.21	14,447.56	100
	<i>*Production data source October 2018 to September 2019, on this period Runtu Estate is still un certified.</i>						
1.7.3	FFB description from other source						
	Name of sources/Organisation	Type of Organisation	Number of Smallholder	Production Area (Ha)	Supplied to Mill		
					FFB (tonnes/year)		
	Lada Estate/Non Certified	Under management of PT. SSS	-	5,019.96	99,542.49		
	Runtu Estate Div. South/Non Certified	Under management of PT. SSS	-	2,753.20	18,332.79		
	Runtu Estate Div. North/Non Certified	Under management of PT. SSS	-	4,773.66	53,303.45		
	Arut Estate Div. 1/Non Certified	Under management of PT. SSS	-	164.26	1,856.24		
	Arut Estate Div. 2/Non Certified	Under management of PT. SSS	-	361.32	3,331.09		
	Kumai Estate/Non Certified	Under management of PT. SSS	-	401.15	10,963.15		
	Plasma Lada 1/Non Certified	Associated smallholder	8	30.5	721.32		
	Plasma Lada 2/Non Certified	Associated smallholder	54	106.08	2,422.16		
	Plasma Runtu South/Non Certified	Associated smallholder	8	15.17	362.13		
	Plasma Runtu North/Non Certified	Associated smallholder	171	100	1,582.17		
	TKD Runtu South/Non Certified	Associated smallholder	3	110	1,334.37		
	Koperasi Karya Tunggal Jaya/Non Certified	Associated smallholder	603	958	887.91		
	Plasma Arut	Associated smallholder	194	288.76	6,436.97		
	Koperasi Karya Tani Tunggal Jaya/Non Certified	Associated smallholder	500	1,200	17,094.08		
	Koperasi Tani Bahagia/Non Certified	Associated smallholder	889	667	11,504.55		
	Iswanto/Non Certified	Supplier	-	300	7,474.89		
	PT. Mentobi Makmur Lestari/Non Certified	Supplier	-	4,600	28,820.38		
	TOTAL			-	-	265,970.14	
<i>*Source FFB Receiving data period October 2018 to September 2019</i>							
1.7.4	Product categories			FFB, CPO, PK			
1.8	Estimate Tonnage of Certified Product						
1.8.1	Past Annual Claim Certified Product		Previous Certificate Claim 28 November 2018 to 27 November 2019 (tonnes/year)		Actual certified product (January to September 2019) (tonnes/year)		
	• FFB Production		15,612		10,715.75		
	• CPO Production		3,591		2,399.99		

	<ul style="list-style-type: none">Palm Kernel (PK) Production	703	463.12					
1.8.2	Product Selling							
	Tonnage of selling product	Period of actual selling product (January to September 2019)						
	<ul style="list-style-type: none">CSPO sold as RSPO certified product	0						
	<ul style="list-style-type: none">CSPK sold as RSPO certified product	0						
	<ul style="list-style-type: none">CSPO sold under other scheme	0						
	<ul style="list-style-type: none">CSPK sold under other scheme	0						
	<ul style="list-style-type: none">CSPO sold as conventional	2,145						
	<ul style="list-style-type: none">CSPK sold as conventional	409						
1.8.3	Estimate of Certified FFB Claim							
	Name of Estates	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)			
	Lada Estate	3,964.42	3,045.72	73,470	24.12			
	Runtu Estate	2,753.20	965.41	19,250	19.94			
	TOTAL	6,717.62	4,011.13	92,720	23.12			
	<i>*Projected FFB production for 27 November 2019 to 26 November 2020</i>							
1.8.4	Estimate of Certified Palm Product Claim							
	Name of Mill	Capacity (tonnes/hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel		Supply Chain Module
				Output (tonnes)	Extraction (%)	Output (tonnes)	Extraction (%)	
	Lada POM	60	92,720	21,790	23.50	4,170	4.50	Mass Balance
	<i>*Projected CSPO and CSPK production for 27 November 2019 to 26 November 2020</i>							
1.9	Other Certifications							
	Others			ISPO: MUTU-ISPO/167 dated 22 August 2019 until 21 August 2024				
1.10	Time Bound Plan							
1.10.1	Time Bound Plan for Other Management Units							
	Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status		
	MILL	Time Bound Plan						
	Indonesia							
	Lada POM (PT Surya Sawit Sejati)	2016		713.47 ha (Division 1)	2017	Kotawaringin Barat District, Central Kalimantan	Certified	
				3,250.95 ha (Division 1 & 2)	2019	Kotawaringin Barat District, Central Kalimantan	Certified	

		Lada Estate	1,769.00 ha + 740.21 ha (Division 1 & 2)	2023*	Kotawaringin Barat District, Central Kalimantan	
		Runtu Estate	2,753.20 ha (Division North & South)	2019	Kotawaringin Barat District, Central Kalimantan	Certified
			4,773.66 ha + 1,373.14 ha (Division North & South)	2023**	Kotawaringin Barat District, Central Kalimantan	
		<i>Farmers own land and also new ijin for Plasma in Arut and Kumai Estate</i>	3411.26 ha Plasma is subject to issuance of land title for the members and SK Bupati.	2020***	Melawen Village and Lada Mandala Jaya Village, Pangkalan Lada Sub-District Medang Sari Village, Sub-District Arut Selatan Other PLASMA	
<p>* Partial HGU is in progress.</p> <p>**Land Swap/<i>Pelepasan HP/HPK</i> subject to the issuance of SK land swap/<i>pelepasan</i> by the <i>Kementrian Lingkungan Hidup dan Kehutanan</i>. (Government of Indonesia).</p> <p>***Subject to issuance of land title for the members and <i>SK Bupati</i>.</p> <p>**** <i>Hak Pakai</i> work is in progress.</p>						
Malaysia						
Jenderata POM	2008	Jenderata Estate, Seri Pelangi Estate, Ulu Basir Estate, Ulu Bernam Estate, Sungai Ering Estate, Sungai Chawang Estate, Changkat Mentri Estate, Lima Blas Estate		2008	Teluk Intan, Perak Darul Ridzuan, Malaysia	Certified
	2022	Tanarata Estate (supply base of Jendarata POM upon RSPO certified)		2022	Jalan Batu 7, Mukim Changkat Jong, 36008 Teluk Intan, Perak Darul Ridzuan, Malaysia	Will be certified within 3 years from the date of acquisition, 17 th August 2019

	Ulu Basir POM	2008	Jendarata Estate, Seri Pelangi Estate, Ulu Basir Estate, Ulu Bernam Estate, Sungai Ering Estate, Sungai Chawang Estate, Changkat Mentri Estate, Lima Blas Estate	2008	Teluk Intan, Perak Darul Ridzuan, Malaysia	Certified
	Ulu Bernam POM	2008	Jendarata Estate, Seri Pelangi Estate, Ulu Basir Estate, Ulu Bernam Estate, Sungai Ering Estate, Sungai Chawang Estate, Changkat Mentri Estate, Lima Blas Estate	2008	Teluk Intan, Perak Darul Ridzuan, Malaysia	Certified
	UIE POM	2008	UIE Estate	2008	Pantai Remis, Perak Darul Ridzuan, Malaysia	Certified
1.10.2	Progress of Associated Smallholders and Outgrowers for Certifiable Standard					
	There are no associated smallholders/outgrowers supplying FFB to the mill in Malaysia. However, for Lada POM, there are associated plasma smallholders (Lada, Runtu, Arut, Kumai) and (4) four unassociated independent FFB suppliers. All outgrowers and smallholders is still on preparation process due to land title issuance from the related agencies. Internal audit result has been verified by auditor team.					

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-1	<p>1. Trismadi Nurbayuto (Lead Auditor). Indonesian Citizen. Diploma of Forest Management from Forestry Faculty; Associate Degree of Economic from Economic and Management. He has experienced as field assistant on oil palm plantation year of 2008. Therefore, he has experienced as HCV and SEIA Assessor on 2010-2013. He has been followed HCV identification and management training; ISO training (9001;14001; 22000); ISPO Lead Auditor's training; Safety Expert; RSPO Lead Auditor's; OSH Auditors by Government Regulation No 50 year of 2012; and RSPO Next. He has been conducted audit on ISPO and RSPO scheme since year of 2013 as an Auditor on several aspect as environment, OSH, Legality, Best Management Practices, Social, Worker Welfare, Conflict Resolutions, Long term Business Plan and Supply Chain on Palm Oil Mill. During this assessment verified Legal, Social, and Partial Certification aspect.</p> <p>2. Brigitta Prita (Auditor). Citizen of Indonesia. Bachelor of Forestry, Department of Forest Resources Conservation and Ecotourism. She had attended Training ISPO by Commission ISPO on June 2013, Training ISO 9001:2008 Quality Management System on January 2014, In House Training 17021 and 17065 management system and Product Quality, Training High Conservation Value by IPB on September 2015, In House Training HCV on August 2016, In House Training Roundtable Sustainable Palm Oil on January 2014; In House Training ISO 14000:2004 Environmental Management System. She has been audit experience ISPO & RSPO since April 2013 in the environmental, conservation, waste management and worker welfare aspects. During this assessment verified environment, HCV, GHG & SCCS aspect.</p> <p>3. Haikal Ramadhan Kharismansyah (Auditor). Indonesian citizen, Bachelor of Agriculture department of plant and pest disease (Agrotechnology). He has 3 years' experience as an Agronomy Staff in private oil palm plantation in Indonesia. Training which had attended including Basic Management Development Program Agronomy, Integrated Urban Pest Management, Integrated Pest Management, ISO 9001: 2015, Auditor ISPO, RSPO awareness, ISO 22000 awareness. Did some audit ISPO scheme with aspects Best management practices. During this assessment verified transparency, OSH and Worker Welfare.</p> <p>4. Satria Adi Putra (Auditor). Indonesian citizen, Diploma III majoring in Palm Oil Plantation. Have experience of work more than six years since 2009 as the operational staff of private oil palm plantations in Indonesia. Training have been followed including Occupational Health and Safety Expert, Orang Utan and Wildlife Management, ISPO Auditor Training, RSPO Awareness, IHT Potential Mapping and Conflict Resolution in Production Forests, OHSAS 18001, SA 8000, RSPO Lead Training, Lead Auditor Training for ISO 9001, ISO 14001, ISO 17021, ISO 17065, ISO 19011, ISO 22000. During this audit, he to verify Best Management Practices and Long Term Business Plan.</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA-1	<p>Number of auditors: 4 auditor</p> <p>Number of days for ASA-1 at site: 5 days</p> <p>Number of working days for ASA-1 at site: 20 Working days</p>
2.2.2	Assessment Process
ASA-1	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Surya Sawit Sejati & Industry – Lada Mill 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 E for CPO Mill).</p> <p>During ASA-1 conducted there is extension scopes such as Lada Estate (3,250.96 Ha) and Runtu Estate (2,753.20 Ha), the actual Certification scopes is 6,7171.62 Ha (Lada POM, Lada Estate and Runtu Estate). 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)</p>

	<p>field observation, aiming to observe directly the sufficiency of implementation on site.</p> <p>Some opportunities for improvement of the results ASA-1 delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase ASA-2.</p> <p>Improvement of findings from main assesment findings were observed by auditors at this ASA-1 assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA-1.</p> <p>The assessment program please find Appendix 2.</p>
2.2.3	Locations of Assessment
ASA-1	<p>Mill</p> <ul style="list-style-type: none"> • WWTP. Observation and interview with operator related management of liquid waste. • Biogas Plant. Observation and interview related management of biogas plant. • Weight Bridge. Observations regarding weighing systems, recording of incoming fruits, and remuneration. • Sorting and Grading. Observation and interview regarding FFB sorting and grading procedures. • Kernel. Observations and interviews about MCU and PPE. • Boilers. Observations and interviews regarding work procedures, OSH licenses, and remuneration systems. • Engine Room. Observations and interviews regarding work procedures, OSH licenses, and remuneration systems. • Sterilizer. Observations and interviews regarding work procedures, OSH licenses, and remuneration systems. • Workshop Observations and interviews regarding work procedures, OSH licenses, and remuneration systems. • Sorting and Grading. Observation and interview regarding FFB sorting and grading procedures. • Kernel. Observations and interviews about MCU and PPE. • Boilers. Observations and interviews regarding work procedures, OSH licenses, and remuneration systems. • Engine Room. Observations and interviews regarding work procedures, OSH licenses, and remuneration systems. • Sterilizer. Observations and interviews regarding work procedures, OSH licenses, and remuneration systems. • Workshop Observations and interviews regarding work procedures, OSH licenses, and remuneration systems. <p>Runtu Estate.</p> <ul style="list-style-type: none"> • Pesticide/weeding application, Block E01, South Division. Observation and interview with Foreman and 6 pesticide Applicators towards technical, manpower, OSH, environment and conservation aspects. • Manuring, Block E14, South Division. Observation related manuring system, manpower, OSH and Environment/HCV. • Pest and Disease Census, Block E2. Observation related pest management and census technic. • Maintenance Prunning, Block E13 Observation related soil management and soil monitoring. • Housing of Runtu South. Observation and interview related infrastructure, facilities, domestic waste, and others. • Landfill Block E 3 of Runtu South. Observation related management of domestic waste. • Pesticide storage. Observation and interview store keeper related management of pesticide. • Lubricants storage. Observation and interview store keeper related management of lubricants. • Fertilizer storage. Observation and interview store keeper related management of fertilizer. • Firefighters. Observation and simulation related firefighters. • First aid Post. Observation and interview related management first aid. • Schedule waste storage. Observation and interview related management of schedule waste. • HGU pole No E12, Field F8. HGU pole on good condition and demarcated, border with rice field government program. • HGU pole B11, Field E34. HGU pole on good condition and demarcated, border with Rehabilitation area. • HGU pole B12, Field E32. HGU pole on good condition and demarcated, border with Rehabilitation area. • HCV4, Field F7. Observation related HCV management. • Trashcan, Field E4. There is separated between organic and anorganic rubbish.

- **Harvesting Afdeling 1.** Observation and interview regarding harvest procedures and wage systems
- **Loose Fruit picker Afdeling 1.** Conservation and interviews using PPE and wage systems
- **Pesticide Mixing Warehouse and PPE Storage.** Observations and interviews about the management of PPE and chemicals.

Lada Estate.

- **Well monitoring at block 9 residential land of Lada Estate.** Observation related management of underground water.
- **Well monitoring of land application Block 29 of Lada Estate.** Observation related management of underground water.
- **Water Intake near Lada office.** Observation related management of water for process and domestic.
- **Land application block 29 Lada Estate.** Observation and interview related management of liquid waste.
- **HGU pole No 40, Field 53.** HGU pole on good condition and demarcated, border with Jergendul River. And also observe regarding riparian management, there are signboard and spraying limit.
- **HGU pole No 41, Field 53.** HGU pole on good condition and demarcated, border with Jergendul River. And also observe regarding riparian management, there are signboard and spraying limit.
- **HGU pole No 29, Field 115.** HGU pole on good condition and demarcated, border with Biru River. And also observe regarding riparian management, there are signboard and spraying limit.
- **HGU pole No 30, Field 117.** HGU pole on good condition and demarcated, border with Biru River. And also observe regarding riparian management, there are signboard and spraying limit.
- **HCV6, Field 78.** Observation related HCV management.
- **Clinic.** Observation and interview regarding work accident case records, medical waste management, and medical infrastructure facilities
- **Landfill. Block 44.** Observation regarding domestic waste management
- **Fertilizer and Pesticide Warehouse.** Observation and interview regarding fertilizer and pesticide management
- **Workshop.** Observations and interviews with welder and OSH training that have been followed
- **Afdeling Housing 2.** Observation and interview regarding workers welfare facilities and infrastructure
- **Afdeling 1 PPE Storage.** Observation and interview regarding PPE management after the activity
- **Reservoir.** Observation regarding water source management.
- **Pesticide/weeding application, Block 103/104, Division 2.** Observation and interview with Foreman and 4 pesticide applicators towards technical, manpower, OSH, environment and conservation aspects.
- **Harvesting, Block 10, 14, 25, Division I.** Observation and interview with Foreman and Harvesters team towards technical, manpower, OSH, environment and conservation aspects.
- **Manuring, Block 93/94 Division II.** Observation related manuring system, manpower, OSH and Environment/HCV.
- **Empty Fruit Bunch Application, Block 22, Division I.** Observation the EFB application location with dosage 200 Kg per plants.
- **Pest and Disease Cencus, Block 18, Division I.** Observation related pest management and census technic.

Monday, October 7th 2019.

Public consultation with Environment Agency, Plantation Agency of West Kotawaringin related cooperation with company such as mandatory report submission, EIA document, Land claim, land conflict, Permit location, Land permit, Plantation class and others. Public consultation at Runtu & Sungai Rangit Jaya Village.

Tuesday, October 8th 2019.

Public consultation with internal stakeholders consist of local contractor (CV Bahri, CV Sungai Rangit Jaya, Labor union of Lada Mill, Gender committee and others.

2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.

ASA-1	<p>Summary of stakeholder consultation process</p> <p>Consultation of stakeholders for PT Surya Sawit Sejati was held by:</p> <ul style="list-style-type: none"> • Public consultation meeting with government institution in West Kotawaringin on October 7th, 2019. • Public consultation meeting with communities including previous land owner (Runtu Village and Sungai Rangit) on October 7th, 2019. • Public consultation meeting with internal stakeholders (Labor union, CV Bahri, CV Sungai Rangit gender committee on October, 8th, 2019 <p>Numbers of input from stakeholders were clarified by PT Surya Sawit Sejati.</p>
2.3.2	Stakeholder contacted
	Please find appendix 1
2.4	Determining Next Assessment
ASA-1	The next visit ASA-2 will be conducted eight (8) month to twelve (12) month after date of annual license (July to November 2020).

3.0 ASSESSMENT FINDINGS

3.4 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Lada POM – PT Surya Sawit Sejati., United Plantations Berhad operation consisting of one (1) mill and two (2) oil palm estates.

During the assessment, there were three (3) Nonconformities were assigned against Major Compliance Indicators; one (1) nonconformity were assigned against Minor Compliance Indicators and one (1) opportunity 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/etc). Those corrective actions taken that consist of three (3) Major non-conformities had been closed out shall be verified during next assessment.

MUTUAGUNG LESTARI found that Lada POM – PT Surya Sawit Sejati, United Plantations Bhd complied with the requirements of RSPO Principles & Criteria and National Interpretation, RSPO Principles and Criteria (P&C) for Sustainable Palm Oil Production, Republic of Indonesia - RSPO INA-NIWG, 30 September 2016. RSPO Supply Chain Certification Standard and System For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014, Revised on June 2017 (Module E for CPO Mill)

Therefore, MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is continued.

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
PRINCIPLE #1 COMMITMENT TO TRANSPARENCY		
1.1	Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	
1.1.1	<p>The company can show the stakeholder book of PT Surya Sawit Sejati for 2019. Company identification states the stakeholders associated with the company are as follows:</p> <ul style="list-style-type: none"> - OSH Committee members: 7 people - Gender Committee Members: 10 people - Firefighting Members: 7 people - Goods and Services Supplier: 72 (from PT, CV, Cooperative and Individual elements)] - Companies around PT SSS: 10 companies - Contractors: 34 (from PT, CV and individual elements) - GovernmentService and Agency: 64 elements - Religious Leaders and Community Leaders: 60 people <p>A stakeholder meeting was held on 24 July 2019 which was attended by 203 internal and external stakeholder representatives. During the meeting the types of information that can be accessed and information about company policies such as the Occupational Health and Safety Policy, Environmental Policy, Reproductive Rights Policy, and so forth were conveyed.</p>	
1.1.2.	<p>Procedure for providing information / documents by stakeholders, the company will provide a response from each information request 7 days after the request for information enters the company and a maximum of 30 days. Example</p>	

Letter from the Regional Secretariat of West Kotawaringin Regency with a letter number 500/155 / EK dated September 9th, 2019 regarding the invitation for a follow-up request for Decree on the Determination of Prospective Participants of PT SSS Plasma Farmers to be held on September 10th 2019 has been responded by the company.

There is a Registry of Request/Complain book which is a recap book of requests for information, requests for assistance, and complaints from relevant stakeholders. The documentation contained in the book includes:

- Letter Number 0452/1156 / PKH.2 dated August 29, 2019 from the Office of Animal Husbandry and Animal Health of Kotawaringin Barat Regency regarding a request for solid assistance to farmer's / livestock groups in Pangkalan Lada Sub-district.
- There is a letter from the HRD section number 209 / HRD / INT / UP-PTSSS / IX / 2019 to the mill manager to request a solid forwarding the letter from the Office. Replies from the mill manager through letter No. 065 / MM-ED / PT.SSS / IX / 2019 regarding the schedule of taking solid on October 2, 2019 by 2 rits. Attached weight ticket No 222646 as proof of solid delivery to the Office of Animal Husbandry and Health of Kotawaringin Barat Regency.

Based on interviews with the Environment Agency, Plantation Agency, Manpower Agency and National Land Agency of Kotawaringin Barat District are known that the stakeholders already know related the mechanism of providing information and responses. The company has responded to every letter given by the Stakeholders.

The management unit has been report to relevant agencies, such as:

- Land utilization period of 2018/2019 reported to the National Land Agency on 10 August 2019.
- Plantation business development report half of year I 2019 dated 10 July 2019.

Meanwhile examples of mandatory reports that have been routinely submitted to the relevant agencies include:

- P2K3 Quarter III Report of PT Surya Sawit Sejati Number 289 / HRD / EKS / UP-PTSSS / X / 2019 to the Head of Manpower and Transmigration Agencies of Kotawaringin Barat Regency. Its report was Received by the agencies on October 9, 2019
- Quarterly Plantation Business Development Report Number 169 / L / PB / X / 2019 to the Office of Food Crops, Horticulture and Plantation of Kotawaringin Barat Regency. Received on October 9, 2019
- Quarterly Fire Control and Monitoring Report III Number 166 / L / PB / X / 2019 to the Office of Food Crops, Horticulture and Plantation of Kotawaringin Barat Regency. Received on October 9, 2019
- WLTk of PT SSS 2018 period by online reporting.

Status: Comply

1.2

Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.

1.2.1.

The types of information that can be accessed include land rights, health and safety plans, assessment plans related to social impact environments, conservation documents, pollution prevention and mitigation plans, details of complaints and complaints documents, ongoing improvement plans, certification publication of RSPO certification, and policies on human rights. If there is updating of stakeholders, the company has been adding in the list stakeholders such in stakeholders list in 2019.

Work guides or company SOPs or documents and policies made by PT Sawit Surya Sejati are confidential and also as guidelines for other work, point 1 to 9 mentioned above are documents that cannot be disseminated to third parties without obtaining approval from the parties' management of PT Surya Sawit Sejati.

Based on interview with smallholders members in Sungai Rangit Jaya Village sighted that the company has socialized about deduction of smallholders payment, and it can be accessed by the smallholder board or members.

Status: Comply

1.3
Growers and millers commit to ethical conduct in all business operations and transactions.
1.3.1.

The company already has a code of ethics stating that PT Surya Sawit Sejati is committed to practicing good corporate governance principles, such as: transparency, accountability, responsibility, self-reliance, equity and equality. These values are reflected in the Code of Conduct which guides the management unit, the Board of Directors, the Board of Commissioners, and all employees in carrying out their day to day tasks by implementing standards of conduct in their interactions with other employees, shareholders, communities, and local communities. The Code of Conduct applied employees to:

- a. Enhancing accountability, transparency, and compliance with relevant regulations.
- b. Carry out tasks with high professionalism and integrity.
- c. Avoid of activities that may create a conflict of interest.
- d. Avoid of corruption, collusion, and nepotism.
- e. Protecting company properties and information, either during work or after no longer working in the company.

The socialization of the code of conduct at Runtu Estate on July 20th, 2019 & September 21st, 2019 totaling 32 harvesters and others. Information dissemination to security officers on June 10th, 2019 was located at the Security Guard Post. Socialization for Mill workers was held on October 9th, 2019 with 27 workers (Process, Weighbridge, Biogas Plant, Power, Grading, Laboratory, Boilers, etc.). Based on interviews with local contractors (CV Bahri & CV Sungai Rangit Jaya) are known that there had been a socialization on the code of ethics policy. For example, regarding reasonable business, conflicts of interest and others.

Status: Comply

PRINCIPLE #2 COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS
2.1
There is compliance with all applicable local, national and ratified international laws and regulations.
2.1.1.
Environment:

The company already has an environmental permit in accordance with applicable regulations.

- PT Surya Sawit Sejati - Runtu Estate schedule waste permit number 553/009 / LH / DPMPSTSP.D April 16th, 2019 is valid for 5 years from the date of stipulation.
- PT Surya Sawit Sejati - Lada Estate schedule waste permit number 503/020 / LH / DPMPSTSP.D is in accordance with the decision of the One Stop Investment and Integrated Services Office from October 31st, 2019, valid for 5 years.

Legality.

The company has had several document for their operational as follows:

1. Land Use Title for their operational area.
2. Plantation business permit for cultivation of oil palm from District Head of Kotawaringin Barat No. EKBANG/525.26/598/XII/2006 dated on December 30th 2006.
3. Plantation business permit for processing from District Head of Kotawaringin Barat No. EKBANG/525.26/102/EK/2010 dated on April 28th, 2010 for 15,650 Ha area and Palm Oil Mill with Capacity 60 MT/hours.

OSH Aspect.

There is a Certificate No.: Ket.566 / 307 / PK.10 / X / 2019 dated October 9, 2019 from the *UPT* Manpower and Transmigration Office of the Department of Manpower and Transmigration of Kalimantan Tengah Province which states that inspection and testing of mill equipment is carried out by *PJK3PT* Jaya Business Mandiri.

The number of equipment inspected was 47 units with quite good results. The letter stated that the test results would be formally submitted one month after the testing process. The testing itself was carried out on September 24, 2019. The equipment tested included:

- Steam Boilers - Vickers 35,000 kh / Hr
- Steam Sterilizer Vessel
- Steam turbines
- Etc

In addition, the permit can be shown as follows:

1. Steam vessel permit deed No. 1 with Permission No. 18.KAB.108.A
2. Steam vessel permit deed No. 2 with permission No. 18.KAB.109.A
3. Steam Separator No. 1 with permission No. 18.KAB.106.A
4. Steam Sterilizer No. 1 with permission No. 18.KAB.111.A

2.1.2, 2.1.3 and 2.1.4

The company has had a system to identify the legal requirement related to plantation business. All requirement documented in regulation list that set by Human Resources and General Affair Department. It kept in mill and estate office. To ensure all operational activities in accordance with applicable regulations, they update the regulations and implementation also every semester. Whole process performs by Human Resources and General Affair Department.

Status: Comply

2.2

The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.

2.2.1.

The CH has obtained land title (HGU & HGB) with total area 6,743.90 Ha, however there are area some areas that are occupied by the community with area 26.28 Ha. The extension of RSPO scopes is **6,717.62 Ha**. The full details of land title certificates as follow:

1. HGU Number: 42 dated 4 July 2005 with area 738.1 Ha.
2. HGU Number: 00058 dated 12 March 2018 with area 358.10 Ha
3. HGU Number: 00059 dated 12 March 2018 with area 328.40 Ha
4. HGU Number: 00060 dated 12 March 2018 with area 103.30 Ha
5. HGU Number: 00061 dated 12 March 2018 with area 222.90 Ha
6. HGU Number: 00062 dated 12 March 2018 with area 480.10 Ha
7. HGU Number: 00063 dated 12 March 2018 with area 464 Ha
8. HGU Number: 00064 dated 12 March 2018 with area 580.80 Ha
9. HGU Number: 00065 dated 12 March 2018 with area 678.40 Ha
10. HGU Number: 00066 dated 12 March 2018 with area 103.60 Ha
11. HGU Number: 00067 dated 12 March 2018 with area 261.70 Ha
12. HGU Number: 00068 dated 12 March 2018 with area 111.10 Ha
13. HGU Number: 00069 dated 12 March 2018 with area 983.10 Ha
14. HGU Number: 00070 dated 12 March 2018 with area 359.80 Ha
15. HGU Number: 00071 dated 12 March 2018 with area 837.80 Ha
16. HGU Number: 00072 dated 12 March 2018 with area 90.42 Ha
17. HGU Number: 00073 dated 12 March 2018 with area 22.01 Ha
18. HGU Number: 00074 dated 12 March 2018 with area 10.62 Ha
19. HGB Number: 0002 dated 11 July 2016 with area 1.651 Ha

2.2.2.

The company has had procedure to maintain boundary poles (SOP Maintenance Patok HGU No. SOP-HRD-016-R00) that approved by President Director since January 1st 2016. Boundary poles maintenance performed regularly every semester by each estate/division and documented in Checklist Boundary Document. Based on field observation in boundary poles number 29, 30, 40, 41 in Lada Estate and also poles number E12, B11 in Runtu Estate known that all boundary poles have been well maintained.

2.2.3; 2.2.4

The company has had procedure for land dispute settlement (SOP *Proses Penyelesaian Sengketa Lahan*/Land Disputes No: SSS-COMDEV (HMS) – 024) that approved by President Director since April 1st 2014. This procedure has contained several step regarding to dispute settlement such as:

- Claim from land owner.
- Statement letter.
- Supporting document (land ownership letter from head of village/sub-district, land certificate etc).
- Document receive.
- Community claim.
- Land measurement.
- Land mapping.
- Negotiation.
- Negotiation result report.

Based on document verification there are one land dispute has been resolved dated 21 September 2019 on behalf M. R from Sei Pulau Village, Sei Sapak Village, Peramuan Village and Kumai Hulu Village. The second issue was obtained from stakeholders consultations with National Land Agency, there are land dispute with *Ex Plasma Lada Lestari* from Mandala Jaya Village. The latest letter from Mandala Jaya Village Head number 140/48/DS-LMJ/Pemdes.1 dated 24 May 2018 to the National Land Agency of Kotawaringin Barat Regency about land re-measurement request. Based on interview with the management sighted that the company still waiting response from related agency to conducted land re-measurement it.

The latest land dispute issue from Mr. GAS by letter dated 10 September 2019, however result of verification by the company sighted that the land dispute issue has received by the court decision such as court decision letter No 53/Pdt.G/2015/PN. Pbu dated 18 May 2016 and No 55/PDT/2016/PT.PLK dated 13 December 2016 that the claim of the six residents (Mr. GAS cs) was rejected, because it refers to the court's decision.

2.2.5.

According to point number 6 SOP *Proses Penyelesaian Sengketa Lahan*/Land Disputes No: SSS-COMDEV (HMS) – 024, the company has had the system to provide participatory mapping that stated "*land disputes team, GIS and land claimer will check the land disputes area and make the land disputes map (including signed the minutes of measurement, attending list, photos).*"

2.2.6

PT. Surya Sawit Sejati has had Universal Human Right policy that approved by President Director dated on January 13th 2016. Through this policy, the company committed to not using violence approach in land dispute settlement. It written as "*We will maintain peace and ethics in operational activities of PT. Surya Sawit Sejati with no use of physical violence or by using tools and / or weapons*".

Based on public consultation result with National Land Agency staff and some village representative of Runtu and Sungai Rangit Jaya Village, there is no physical violence and/or weapons usage in land disputes settlement.

Status: Comply

2.3

Use of the land for oil palm does not diminish the legal rights, or customary rights, of other users, without their free, prior and informed consent.

2.3.1

The company has had land compensation procedure (No. SOP – HRD – 015 – ROO) that approved by President Director dated on January 1st 2016. Based on document verification, there is three land acquisition on 2018. Management has showed land acquisition document (map, statement letter, etc) and payment on 28 April 2018 to Mr. CH with area 0.58 Ha, dated 15 May 2018 to Mr. MM with area 10.22 Ha and dated 18 May 2018 to Mr. EK with area 0.75 Ha.

2.3.2; 2.3.3; & 2.3.4

Based on public consultations with the previous land owners from Runtu and Sungai Rangit Jaya Village sighted that land acquisition process was carried out with the fair and transparent manner in which the land owners. All documentation of land acquisition is known by the related village government.

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

The company has shown the document Estate/Mill Budget for 5 Years. Based on these documents, it is known that the long-term plan for the 2017-2022 period for PT SSS which includes Area/Hectare Statement, Capital Expenditure, Appointment of General Charges I & II, General Charges I, General Charges II, Summary of CPO & PK Revenue Expenditure, Crop Production Statement, Revenue Expenditure Mature Palm Oil, Security Posts & Personnel's and Plasma-Immature Planting.

The company has submitted a budget review document (Evaluation) in 2018. The document contains, among others, comparative data between budget and realization, production achievement and realization/achievement of targets for plant maintenance activities. An example of the Minutes of Management Meeting was held on September 4, 2019 discussing the achievement of harvesting rounds, management accounts, etc. Associated with the latest information is always communicated to employees in the form of socialization or delivered in the morning briefing before work.

3.1.2

The company has presented the Internal Memorandum Documents on March 8, 2019 regarding Replanting Program for Lada Estate issued by the General Manager. Based on these documents, it is known that there are no replanting plans for the next 5 years. The replanting activity will be carried out in 2025.

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

Standard Operating Procedure (SOP) related to oil palm cultivation and processing activities is systematically documented and collected. The company has specialized staff from the EHS Department responsible for document control, so that it can ensure that each management unit (plantation and factory) stores the same version of the SOP. SOPs are available in Indonesian and English. Regarding technical cultivation, SOPs are socialized through training and direction in every morning apple.

In addition, related to the technical procedures for the processing of oil palm, from receipt of FFB to dispatch, refer to the Lada Engineering Department SOP document dated 222 and 24 May 2010 which was approved by the General Manager and Mill Manager. Based on the SOP, it is known that the procedure has covered every operational activity of the plantation and mill.

Based on field visits and interviews with fertilizers in Field 93 Lada Estate Field 93, it is known that workers have understood procedures related to fertilization activities such as not conducting fertilization near water bodies and how to sow fertilizer on the edge of the dish.

4.1.2

The company has a master list of all SOPs that have been classified according to work fields such as Estate, Finance, United Plantation Research Department, Biodiversity, Human Resources, Legal, and Mill. The document control officer who is part of the EHS Department has the responsibility to monitor if there are SOP updates and ensure the latest version is available in the unit.

Internal supervision is carried out in stages starting from the foreman, the assistant afdeling, to the estate chief. Field inspections are carried out every day by these three elements to ensure the implementation of the established procedures. In addition, there is a regular review every 3 months by the chief executive director and once a year by the director of the United Plantation Research Department.

Based on the document review, it was found that there was a collaboration between PT SSS and several contractors including CV Bahri, CV Guntur, Bumdes Karya Mandala Makmur, CV Muara Mas Berkah Sejahtera, CV Aufa Nur Jaya, CV Ragika, CV Sungai Rangit Jaya, etc. But, the company has not been able to show that inspection or monitoring activities are available to all contractors / third parties, for example evaluating PPE fulfillment, health insurance, fulfilling contractor employee salaries and so on. **It is become nonconformities No. 2019.01 with minor category.**

4.1.3

The company has an internal system of corporate supervision that aims to monitor operational implementation in accordance with the SOPs owned, among others, by conducting RSPO internal audits every year, conducting internal audits of plantations and factories including checking aspects of implementation procedures / SOPs and administration. Internal plantations such as field visits to plantations and factories carried out by company leaders (General Manager, Manager, Staff and Foreman).

4.1.4

The SOP for FFB purchasing No. SOP-HRD-013-R00 dated 3 February 2016 was endorsed by the President Director who explained that:

- Suppliers come directly to offer cooperation in purchasing FFB or the company comes to offer cooperation with other parties (companies, cooperatives or individuals).
- The company team consisting of factories, estate and Financial Controller conducted a field survey in the supplier's estate.
- Supplier sends FFB samples to check quality
- The company prepares agreement related buying and selling

The company has several FFB suppliers that supply Lada POM including Lada Estate (HGU & Non HGU), Runtu Estate (HGU and Non HGU), Arut Division I, Arut Division II, Sungai Kumai Estate, Lada Plasma I, Lada Plasma II, Plasma Runtu South, Plasma Runtu North and Plasma Sungai Kumai Estate.

Minor
4.1.2

Status: Non-conformity number 2019.01 with minor category

4.2

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

4.2.1; 4.2.2

The company has several procedures for managing soil fertility, including SSS-EST-08 on Fertilization of Immature and Mature Palm Oil, SSS-EST-13 on Erosion Control and SSS-EST-19 on Peatland Cultivation Management.

The company (Lada Estate and Runtu Estate) has shown records of fertilizer realization programs. The fertilizer recordings at Lada Estate include fertilizing Urea in Field 75 on August 29, 2019 totaling 2.08 tons with a realization of 100% compared to the established recommendations and fertilizing Mono Ammonium Phosphate in Field 91 Division 2 on September 18 2019 as much as 2.12 tons with a realization of 100% compared to the recommendations set. Based on the documents it can be concluded that the company has carried out soil fertility management activities and monitored. The company has shown the document of fertilizer usage per ton of FFB. The example in the calculation is the use of Sulfuric Acid fertilizer in Division 1 Lada Estate with the value of using fertilizer/ton of FFB as much as 0.05 ton of fertilizer/ton of FFB.

4.2.3

The company determines that sampling for soil analysis is carried out every two years. Extraction of leaf tissue is carried out regularly every year to be used in the calculation of annual fertilizer dosage recommendations. Extraction and analysis of leaf tissue is carried out internally by PT SSS and tested in the United Plantation Bhd. Laboratory. The parameters

tested include pH, moisture, % macro and micro nutrient content. Monitoring of changes in nutritional status based on visual field conditions and oil palm observations is also carried out regularly every year by the Director of the United Plantation Research Department whose report is published in the Agronomy visit report.

Soil analysis is outlined in the Soil Survey at Lada 2 Estate document in March and April 2017. The realization of evaluating the status of soil fertility is observing the determination of pH, organic C content, total N (%), total P content and P available, K content, Mg content, Na content, Ca content and Cation Exchange Capacity (CEC) value. Besides that, the company has shown a record of the evidence of implementation in accordance with the SOP, among others, the report shows the results of the leaf test using Lab Test No. A008 / 18 dated March 9, 2018 at Lada Estate. The indicators observed include levels of N, P, K, Mg, Ca, B and Ash and supporting data in the form of visual observations.

Based on the results of the document review and interview with the research section it is known that the activities of leaf sampling, soil and visual monitoring are intended to be the basis for determining the recommendations for the coming year and are based on fertilizer requirements in each block.

4.2.4

The company has presented the 2019 POM Solid Waste Product Recapitulation Document (Waste Utilization). Based on these documents, it is known that the company has used it as a way to recycle nutrition. The data is as follows:

- The use of Fiber in the January-September 2019 period was 27,130.90 tons
- The use of shells in the January-September 2019 period was 492.80 tons
- The use of Liquid Effluent in the January-September 2019 period was 233,269.15 tons
- The use of EFB in the January-September 2019 period was 28,539.74 tons

Based on field visits to Field 40 Division 2 Lada Estate it was found that the company had implemented nutrient recycling by utilizing EFB to increase organic content in the soil.

	Status: Comply	
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4.3

Practices minimize and control erosion and degradation of soils.

4.3.1; 4.3.2; 4.3.6

The company has a map of Soil Type Estate with a scale of 1: 50,000 which was made by the PT SSS GIS team in 2016. The map explains the types of soil contained in the company's operational area are inland soil, Flood Prone Area, Inland Sandy Soil, and peat. Types of soil that are classified as marginal are peat, flood areas, and acid sulfate.

Based on the topographic map made by the GIS team of PT Surya Sawit Sejati with a scale of 1: 120,000 years, it is known that the dominant operational area of the company is flat bumpy. There are no steep slopes that require monitoring and special treatment when it is decided to plant.

4.3.3

The company has presented the 2019 Road Maintenance Program documents. The data include the road maintenance program (manual) in Field E19, Runtu Estate in May 2019 covering an area of 32.3 Ha, realization was carried out in May 2019 covering 0.5 Ha (realization of 1.54 % of the budget, it is due to the good road conditions so that no road maintenance activities are needed).

Based on the results of the field visit to Field 40 Division 2 at Lada Estate, it was found that the company had carried out road maintenance activities manually, in general the condition of the road was in good condition and could be passed by the FFB transport truck.

4.3.4

The company has shown procedures for managing peatland contained in the SSS-EST-19 document on Cultivation Management on Peatlands.

The company has presented documents for monitoring land subsidence available in the Peat Subsidies (Lada Estate and

Runtu Estate) documents. In addition, the company has also shown records related to monitoring Water Level with monitoring intervals every day. The data included monitoring the water level in Block E16 (*Pintu 1*) on October 5, 2019 with the result of 40 cm.

Based on the results of the field visit to Block E30 and E32, it is known that the company has installed subsidence pegs. In addition, based on the results of the field visit to Block E24, it is known that the company has installed Watertgate and Water level with a water level of 30 cm from above ground level.

4.3.5

Based on the document review, it is known that the distribution of planting years in the company's operational area is 2004-2009 so that in the near future the company will not do replanting. The company will carry out replanting activities in 2025.

Status: Comply

4.4

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

4.4.1.

The company shows water management plan for 2019 that informs activities, water management in the plantation area, timeline, person in charge and annual budget, for example:

1. Formation of a recovery team for the peat area.
2. Area mapping (Peat type & depth)
3. Delineation of peat areas.
4. Peat land water management.
5. Revitalize peat areas
 - Preparation of forest plant seeds
 - Field preparation & planting.
 - Post-plant care
 - Monitoring and evaluation.
6. Establishment of a peat restoration database.
7. Prevention and control of peat area fires.
8. Public awareness raising & awareness about peat lands.

Observations in conservation areas (rehabilitation) in Runtu Estate is a swamp area, where it has been planted back in an effort to reforest the area. This is accordance with procedure of riparian area management in the form of erosion control procedure no. SOP SSS-EST-13 dated April 14th, 2014.

4.4.2.

Observations in conservation areas (rehabilitation) in Runtu Estate is a swamp area, where it has been planted back in an effort to reforest the area. SOP of riparian area management in the form of erosion control procedure No. SOP SSS-EST-13 dated April 14th, 2014.

4.4.3.

Permit for the utilization of liquid waste on land to Lada estate in accordance with the Decree of the Head of the Investment Office & Integrated Services of One Door West Kotawaringin Regency with Number 503/013 / LH / DPMPTSP.D is valid from March 29, 2019 to March 28, 2024. Land used is located in Division I Lada Estate blocks 17 18, 19, 25, 26, 27, 29,30, 31, 32, 33 & 34 with an area of 191.16 ha. The last WWTP pond is in the coordinates S: 02°35.74.3 "and E: 111°46.33.4".

The testing of liquid waste for period January until September 2019 was conducted by Laboratory who accredited by KAN of Pangkalan Bun, Central Borneo (LP 966 IDN) based on the testing results in pond number 6, its known there is no parameter which exceed the thresholds by the Minister of Environment Decree Number 29 year 2003.

Based on field observation, The Company uses WWTP to treat wastewater and flow it into land applications and methane capture to manage liquid waste.

4.4.4.

The Company showed a permit for surface water utilization dated August 29th, 2018 – August 2021 in accordance with the Decree Head of the Investment Office & Integrated Services of One Door West Number 553/0002/DPM-PTSP/III/IPPAP/2018. Based on the recording of water use for the period January – September 2019 of 0.409 m³ / FFB with an average water consumption for process of 9,675.81 m³. The company has been paid surface water utilization tax for period January until December 2018 to Regional Revenue Agency Technical Implementation Unit Revenue Services for Pangkalan Bun on May 22nd, 2019.

Status: Comply

4.5

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

4.5.1; 4.5.2

The company has shown plans related to integrated pest control. The integrated pest control plan at PT SSS includes the development of the planting of *Turnera subulata*, *Antigonon leptopus* and carrying out the use of natural enemies of pests such as *Felis bengalensis* and so on.

The company has tried to carry out biological control to reduce pest population diseases, such as planting and maintenance of beneficial plants to suppress nettle caterpillars and to suppress rat population. As for the realization of biological pest control activities, among others, the Company has presented the 2019 Integrated Pest Management (IPM) Continuous Improvement Program document. In addition, based on the results of a field visit in Block E01, Runtu Estate, it was found that the company had planted a beneficial plant. In general, based on the recording of Pest and Disease Monitoring Census and field visits, it is known that there are no pests and diseases that cross the threshold.

The company has recorded and evaluated the Integrated Pest Control Census Training conducted on 28 February 2019 at Runtu Estate and was attended by 3 participants consisting of maintenance workers.

Based on interviews with census workers in Block E02 South Runtu Estate Division. It is known that there are no potential pests found in PT SSS, this is also evidenced from the recapitulation of pesticide use, where in the past 1 year there was no application of pesticides in the area of PT. SSS.

Status: Comply

4.6

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

4.6.1; 4.6.2;

The company has demonstrated policies related to safety in the use of chemicals listed in SOP No. SSS-EST-03 dated December 10, 2007. The company has made efforts to avoid the development of resistance to weeds such as the use of different types of pesticides, regulating spray rotation and spraying according to target weeds (selective weeding).

Based on observations and interviews with spraying workers in Field 103/104 Division 2 Lada Estate it is known that worker have carried out spraying in accordance with their procedures such as not spraying near water bodies, have knowledge of the types of pesticides used, understand the dosages used as well as being able to identify the intended target weed. Based on this, it can be concluded that the company can demonstrate procedures and implementation related to safety in the use of chemicals.

4.6.3

The integrated pest control plan owned by the company is contained in an annual budget that informs about the detection and census plans, types of pests, and tools and materials if there are pest attacks that exceed the threshold. Implementation of the plan is to detect and census and control pests.

The company has shown the 2019 Integrated Pest Management (IPM) Continuous Improvement Program document. An

example is the planting of *Turnera subulata* in July 2019 totaling 153 items in Runtu Estate. In addition, based on the results of a field visit in Block E01, Runtu Estate, it was found that the company had planted a beneficial plant.

The company has shown documents on the use of pesticides during the period 2018-2019. Based on these data it is known that in general at Runtu Estate, there is an increase in the use of pesticides due to an increase in the number of weeds. However, the use of pesticides 1A and 1B at Runtu Estate is known that there is a 100% decrease in the use of pesticides where in 2019 there was no use of *brodifakum*.

4.6.4

Besides that, they are shown the Agriculture and Forestry Pesticide documents at PT SSS. The document specifies the type of material used, registration number, target of control, acute oral toxicity (LD50 oral), dose / ha, LD50, active ingredient (%) and active ingredient / ha.

The company has also shown records related to the use of active ingredients of pesticides / ha. For example, the use of Supremo ingredients with 48% active ingredients, the realization of an area of 5054.44 Ha, the use of materials as much as 7187.6 Liters, the use of pesticides per hectare as much as 1.42 liters / ha and the use of active ingredients per hectare as much as 0.68 ai / ha. Based on the field visit to the chemical warehouse, the warehouse stock is as recorded in the warehouse card.

4.6.5; 4.6.7

Procedures for handling pesticides are communicated to workers dealing with pesticides through regular training and outreach. Can also be conveyed during the morning circle before leaving for the field. In addition, there is a safe spraying checklist that contains information ranging from the name of the worker, the spray application block, the material used, the remaining poison (if any) and PPE.

The company has shown training-related records including:

- Spray training at Filed 25, Division 1 Lada Estate on July 2, 2019 with 10 participants consisting of foremen and workers.
- Spraying training in Block E01, Runtu Estate will be held on September 27, 2019 and will be participated by 5 participants.

Based on field observations on spray works Block 103/104 Lada Estate, it is known that there is the use of masks (carbon). This is in accordance with MSDS and identification of risks. In addition, workers have also stated that if there is PPE damage, the workers get a replacement through a regulated mechanism.

4.6.8

Based on document review, interviews with the spray team and information delivered by management representatives for Lada Estate and Runtu Estate, it is known that there has never been any plan or realization of the application of pesticides by air.

4.6.9

Based on field observations to the Lada and Runtu Estate Pesticide Warehouse is known that each product is equipped with an MSDS that informs about active ingredients, LD50, how to poisoning handle, and instructions for use to storage.

To increase spray workers' understanding of safe work methods for themselves and the environment, the company conducts regular training including:

- Maintenance training for sprayer equipment and safety using pesticides on 31 August 2019 attended by 8 members of the Runtu Estate spraying team
- Training of pesticide handling on 12 August 2019 attended by 15 members of the Lada Estate Spraying team

Based on the training evaluation result it is known that the training curriculum includes the responsibility to use PPE, how to pesticide mixing, how to avoid poisoning and handling in case of poisoning, and how to spray applications that do not endanger themselves and the environment. Results of interviews with two spraying workers at Lada Estate 2 and 3 spraying worker on the block E04, Runtu Estate in the southern division are known in addition to formal training, awareness

about safety in using pesticides is delivered routinely at least every two weeks during the muster morning.

4.6.6 & 4.6.10.

The Company has a SOP for handling hazardous Waste (Management, use and storage) with number of SOP PROSES-SSS / 020 / Mill dated 01 December 2013. The SOP contains procedures regarding: General Storage Requirements for hazardous Materials, Storage Building Requirements, Procedure for Use and Expense and Reporting.

The company shows evidence of schedule waste dispatch on 5, 6 & 9 April 2019 by PT Semesta Langgeng Sentosa with details:

- Manifest AZG 0000649 number of 443 kg hazardous waste packaging (Vehicle number KH 8152 EN).
- Manifest AZG 0000643 number of 568 kg of used hazardous waste packaging (Vehicle number KH 8460 GM).
- Manifest AZG 0000738 number of 797 kg of hazardous waste packaging (Vehicle number KH 8470 GM).

There is logbook for July 2019 in schedule waste at Lada Estate such as chemical packaging as much as 467.7 kilogram. Based on the description above, the company has presented documents for the storage and handling of hazardous waste.

4.6.11

In accordance with a letter from PT Prodia Widyahusada sampit branch dated September 13, 2019, the implementation of the MCU activities of PT Surya Sawit Sejati employee was scheduled on September 17-19 2019. When surveillance-1 was carried out the official MCU results had not been issued by the Prodia. However, there is a summary of the results of the PT SSS health check by emailing the prodia (sampit.pms@prodia.co.id) on 30 September 2019.

The results of the examination include Cholinesterase, Audiometry, and Spirometry. Summary of MCU informs the following matters:

Type of Health Check	Estate	Result	Number of Worker
Respiratory Inspection (smog)	Lada I and Lada II	48 People suspect pulmonary dysfunction with mild degrees of restriction	48
	Lada I	All participants were declared normal	46
Cholinesterase	Lada II	All participants were declared normal	33
	Runtu South	All participants were declared normal	25
	Runtu North	All participants were declared normal	33

* Based on the attendance of MCU on 17 and 18 September 2019 it is known that all fertilizer applicators and pesticide applicators have been included in the MCU.

4.6.12

The policy for female employees / workers who are pregnant was signed by the President Director on 12 December 2017. In the policy in point 5 states the type of work for female employees who are pregnant and breastfeeding is in the work in the section not exposed to chemicals as well as the types of work that are not heavy.

Also in the Revision 1 Medical Check-up SOP, which was signed by the President Director on December 12, 2017. Changes to point C number 4, for other types of tests, pregnancy tests are added. Pregnancy monitoring is carried out every month by conducting a urine test on all female workers using a test pack. The executor is the Lada Estate Clinic medical team. The results of the spray inspection pregnancy team for the period of January - September 2019 found that no one was identified in the condition of pregnancy.

Status: Comply

4.7

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

4.7.1

The company has an occupational health and safety policy PT Surya Sawit Sejati endorsed by the President Director on December 10, 2015. The company is committed to ensuring the health and safety of all workers by doing:

- Conduct risk recognition, risk assessment and risk control
- Provide ongoing training and supervision
- Completing and training the use of PPE
- Do not use harmful poisons (eg, paraquat)
- Instilling a culture of being responsible to yourself
- Require each contractor to comply with OSH standards.

Occupational health and safety procedures are validated by the President Director on June 10, 2011, which serves as a guideline for the implementation of SMK3 within PT SSS. OSH related SOPs include: Chapter I. Occupational health and structuring systems; Chapter II OSH Policies and Principles; Chapter III. Establishment of the OSH Committee; Chapter IV Operating safety procedures; Chapter V. emergency response plans; Chapter VI Electrical safety; Chapter VII Occupational health and hygiene; Chapter VIII. Safety inspection and audit; Chapter IX Personal Protective Equipment; Chapter X. Occupational health and safety training; Chapter XI. Promotion and communication; Chapter XII. Investigation and reporting procedures.

OSHA programme and Realization 2019 (Lada POM)

Training	Attendant	Frequency
First Aid		
HIRARC Meeting – Workshop	OSH Committee team, Staff, dan worker	Monthly
HIRARC Meeting – Station Process		
HIRARC Meeting – Station FFB reception		
Fire Drill		

Training Realization:

- 20 September 2019 to 13 Clarification Station workers regarding procedures to be carried out at the station.
- 24 September 2019 to 15 PT Kurnia Tunggal Nugraha contractor workers regarding OSH and contractor responsibility at work.
- 05 September 2019 attended by 35 employees regarding fire drill emergency response.

However, based on observed evidence such as:

- Based on field observation to the Lada 2 housing and Lada 1 PPE storage warehouse, the following facts were found:
Lada 2 Housing:
 - There is 1 Apron stored at the worker's home (The results of interviews with workers are known interviewee is pesticide and fertilizer applicator)
 - There is 1 set of PPE fertilizer applicator in 1 other house
- Lada 1 PPE Storage Warehouse:
 - Based on the daily work plan at the time of the field observation there is no spray and manuring activities
 - Information from the person in charge of the warehouse total pesticide and fertilizer applicator is 16 people
 - PPE available and stored in the warehouse are 11 pieces of rubber gloves; 13 masks; Apron 15 pieces; Jerry cans fertilizer 4; Fertilizer Bowl 0; and 17 Knapsack sprayers
- Based on the list of Lada Estate employees, it is known that the number of Lada 1 spraying workers is 11 people. Whereas for fertilizers applicator as stated by the person in charge of the warehouse are 8 people
- PPE and work equipment are still found, especially for work related to agrochemical stored not in the place provided
- Procedure No. SOP SSS-EST-03 concerning Maintenance of immature / mature Oil palm dated 12/10/2007 in section 3.1.4 J states that all equipment, chemicals, PPE and containers must be returned to the warehouse after use

Thus it can be concluded that the Company has not been able to show consistency in implementing the planned occupational health and safety plan. **Nonconformity No. 2019.02.**

4.7.2

Hazard identification, risk assessment and risk control has been undertaken for each unit activity, the company indicates the HIRARC report, among others Estate: risk assessment for spraying, manuring, pest & disease spraying, harvesting and workshop activities. The HIRARC report describes job step, hazard, effects, existing control, type of control (administration or PPE), probability, severity, risk assessment (low, medium, high), nature of risk control (type, implemented date, implemented by). For example, chemical mixing activities, the danger posed by chemical spilled into

hands and trenches, the effects of skin irritation and environmental pollution, the existing control by training and PPE's, probability 1, severity 1, based on risk assessments entered into low risk levels.

Lada Mill: type of biogas plant activity, loading ramp, electric, press, sterilizer, water treatment, laboratory, workshop, JCB and tractor, kernel station, clarification, bunch press, boiler, effluent, mill store, grading, dispatch, and threshing. Example: sludge pit, hazard: steam odor and slippery smell, effect: respiratory distress and body injury, existing control: PPE's, probability 2 and Severity 3, risk assessment 6 (medium), recommended risk control with increased monitoring of PPE's usage. Progress of OSH action plan assessed and found relevant program implemented according to plan. Updating of HIRARC following occurrence of accident observed and relevant corrective action applied for all estates and mill. Based on field observation to several activities on estate and mill, sighted that the HIRARC has been well implemented.

4.7.3

Workers involved in operational activities have been trained in safe work practices. The training recapitulation shown by the company includes:

Permit/License	Certificate/Series No	Expiry Date
Boiler (Class 1 Operator)	P.08.841.OPK3-PUBT-B.I/XII/2018	07 December 2023
Boiler (Class 1 Operator)	P.12.3509.OPK3-PUBT-B.I/XI/2018	05 November 2023
OSH Electric Technician License	8458/TK3-LIST/IX/2018-P01	25 September 2021
First Aid Officer	17/P3K/IX/2015	30 September 2020
Hoisting and Transport Apparatus	17437/OPK3/PAA-LT/XII/2016	23 December 2021
Hoisting and Transport Apparatus	17438/OPK3/PAA-LT/XII/2016	23 December 2021

The company also shows the Decree of the Head of the Investment Service and Integrated Services of One Door Central Kalimantan Province Number 570/190 / ESDM-IO / VII / DPMTSP-2019 regarding Operation Permit for Electric Power Supply for the Self-Interest of Palm Oil Plantations on behalf of PT Surya Sawit Sejati dated 30 July 2019. The decree is valid for five years.

The company has provided PPE to each worker according to the OSH manual. The company has documentation of PPE distribution to workers in the "Personal Protective Equipments Insurance Record" document. The final handovers was in January 2019. Based on the field observation was known that workers had been equipped with PPE and understood the procedures for replacing PPE if there were PPE conditions that were damaged while working

However based on evidence observed as:

- Information from field visits and interviews with operators at the Engine Room station known they had never attended OSH training for power and production plane.
- Permenaker No 38 year 2016 concerning OSH for power and production plane stated
 - Article 110: Operation of Power and Production Plane is carried out by OSH operators
 - Article 111: OSH operators include first movers, machine tool and production operators; furnace operator
 - Article 113: First movers operators include combustion motor operators, steam turbines, water turbines, gas turbines and windmills.

Thus it can be concluded that the Company has not been able to show the recording of occupational safety and health (OSH) training programs for Power and Production Plane Personnel operators as stipulated in Permenaker No. 38 of 2016. **Non-conformity No. 2019.03.**

4.7.4

The company has formed a P2k3 team (OSH Committee). As the Decree of the Head of the Department of Manpower and Transmigration of Central Kalimantan Province No. PEM. 049 / Disnakertrans / PK-VV III / IV / 2017 April 21, 2017 the composition of the P2K3 team is

- Chairperson: Mill Manager
- Secretary: Paramedic
- Div. Oversight of Occupational Health and Safety
- Div. Fire Fighting

- Div. Environmental Monitoring

The person responsible for OHS is the P2K3 secretary has had OHS Certificate No. Ser.17.3654 / AK3 / U / V / 2017 dated May 3, 2017 is valid for 3 years and SKP No. KEP.3685 / NAKER-BINWASK3 / V / 2017 dated May 3, 2017

P2K3 meetings are held regularly every month to discuss OSH issues and employee welfare, for example regarding the condition of public facilities and housing. The results of the monthly meeting will be considered and discussed when preparing quarterly P2K3 reports that are reported to the relevant Agency.

In monthly meetings and quarterly reports P2K3 has updated the latest OSH conditions. For example, in Runtu estate in May 2019 there was a work accident of NIK RH00161 affected by oil palm powder. The evaluation taken is to emphasize the importance of harvesters using safety glasses and make sure aquades in the first-aid bag are always available. In addition, planned re-socialization to harvest employees and foremen regarding the handling of eye cases affected by oil palm powder.

4.7.5

The Company has a procedure for emergency response, for example Procedure of First Aid, Procedure of Handling Accidents and Work Accident and Procedure of Emergency Preparedness. Based on field visit, company has pointed the evacuation path and assembly point in order to smooth the evacuation process in emergency situation. The evacuation path is available in office and mill and has been completed with map and other *signboards*. At the time of the field visits it is known that in the mill, warehouse, workshop and division offices have supplied First Aid box which monitored regularly. As for the operational activities in the field, supervisors were carrying first aid kits during his work in the field, and mill was also equipped with first aid kits. Based on interview with supervisors in Estate and Mill, sighted that they were been attended on first aid training.

Based on field observation to Lada Estate, Lada POM, and Runtu Estate it is known that First Aid Box/Bag has been available for every worker. Whereas first aid bags are given to each estate foreman. Both the P3K Box and the P3K bag contain 21 items in accordance with Permenaker No. 15 of 2008 concerning First Aid in the workplace. Checking the completeness of the contents of the box and first aid bag is carried out every month.

4.7.6

The company has registered employees in the *BPJS Ketenagakerjaan* and *BPJS Kesehatan* programs. Proof of membership is as follows:

- *BPJS Kesehatan* payment through Bank Voucher No. 001450/19 (2) on September 6, 2019 for the period August 2019. The amount of bills paid is in accordance with the Billing Statement issued by *BPJS Kesehatan*.
Details:
Mess Maid: 5 member
Lada Estate: 481 member
Runtu Estate: 255 member
Lada POM: 75 people (70 *KHT / KHB* and 5 *KHL* member)

From the total number of employees there are several names that cannot be registered in the *BPJS Kesehatan* program. That is because there are non-invalid Identity Card and participants who have registered with *Jamkesda*, or there is no Family Card. In September there is several names with invalid Identity card, for example Hilarius Fahik, Partem, Silaturahim, Edo, and Kartini. while *Jamkesda* participants included Kusnadi, Sapri, Aris, Yani, Maslikah, and Uddin.

The company has conducted communication and coordination with the *BPJS Kesehatan* regarding the problem. However, in the email reply it is stated that if the identity or family card is invalid are required to take care of in the respective population and civil registration office so that later if identity or family card are valid then they can be registered as participants. To facilitate health insurance for invalid identity card and *Jamkesda* participants the company has shown that the participant can get health facilities at the company clinic.

- *BPJS Ketenagakerjaan* Payment for the period of August 20019 through the Bank Payment Voucher dated September 12, 2019 in accordance with the transaction reference number 201009121057263067;

201909121058263512; 201909121059263988; and 2019091121100265218 with the following details:
 Lada Estate: 269 Participant (Upkeep), 10 Participant (Contracts), and 361 (Harvesters), A Total of 640 Participant
 Runtu Estate: 255 participants. 167 (Upkeep). 88 (contracts), and 257 (harvesters), a total of 512 participant
 Lada POM : 75 participant

There are examples of work accident investigations and follow-up for employees such as NIK RH00161. The chronology of work accident that is Harvester RH00161 on May 13, 2019 at 11:00 in block B23. The eye is affected by loose fruit so it is swollen, red, and painful. There is a sharp decrease in vision. After being examined and receiving first aid at a estate clinic, employees are referred to Imanudin Regional Hospital. There is a report on the Phase I Work Accident Case that was made by HR Manager to BPJS on 13 May 2019.

The company has shown a history of medical action starting from health facilities 1 (the company's clinic) and then being referred to Sultan Imanudin Hospital then continuing referral to Telogorejo Eye Specialist Hospital Semarang. Attached proof of the arrangement and assistance costs ranging from airline tickets, lodging, and other costs outside the *BPJS* dependents. There are employee absentee data where the employee for 58 days in accordance with medical recommendations cannot work. But wages are still paid in full.

Occupational Health and Accident Insurance for contractor workers is explained in indicator 4.1.2 regarding contractor evaluation.

4.7.7

Work accident record as document Occupational Accident Cases January – August 2019 is as follows:

Item	Lada	Runtu	Lada POM
Number of Accident	21	25	4
Number of Fatalities	0	0	0
Employee (Annual average)	645	379	88
Working Hour	778.23	466.66	112.60
Work Days Lost	208	206	25
Incident Rate	21.71	43.98	30.30
Frequency Rate	17.99	35.71	23.68
Severity Rate	178.18	294.29	148.01
Fatality Rate	0	0	0

4.7.1 Status: Nonconformity No. 2019.02 with Major category.

4.7.3. Status: Nonconformity No. 2019.03 with Major category.

4.8

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

4.8.1

The PT Surya Sawit Sejati Employee Training Program for the period of 2019 includes the following:

Lada POM

OSHA Program and Realization 2019

Training	Participant	Frequent
First Aid		
HIRARC Meeting – Workshop	OSH Committee, Staff,	
HIRARC Meeting – Station Process	worker and contractor	Monthly
HIRARC Meeting – Station FFB reception	representative	
Fire Drill		

Lada Estate and Runtu Estate

Training	Participant	Frequent
Spraying	Spraying Team	Monthly
Manuring	Manuring Team	Monthly
Emergency Response	Emergency Response Team	Every semester

Land Fire Handling	Emergency Response Team	Every semester
HCV	Lada Estate, Runtu Estate and Contractor Worker	Monthly
Handling on Hazardous Waste	Warehouse officer	Quarterly
RSPO and ISPO Awareness	Contractor and Worker	Annually
4.8.2		
The realization of training in 2019 include the following:		
Estate		
<ul style="list-style-type: none"> - Maintenance training for spraying equipment and safety using pesticides on 31 August 2019 attended by 8 members of the spray team - The socialization of RSPO Principles and Criteria on 14 March 2019 was attended by 12 participants - Hazardous waste management training for Runtu Estate warehouse officers on 18 September 2019 with 2 participants - The socialization of forest and land fire hazard on 15 August 2018 was attended by 13 participants 		
Mill		
<ul style="list-style-type: none"> - 20 September 2019 to 13 Clarification Station workers regarding procedures to be carried out at the station. - 24 September 2019 to 15 PT Kurnia Tunggal Nugraha contractor workers regarding OSH and contractor responsibility at work. - 05 September 2019 attended by 35 employees regarding fire and fire drill emergency response. 		
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.		
<p>There is Letters from the Regional Environmental Impact Control Agency of West Kotawaringin Regency and approve from Regional EIA Commission of West Kotawaringin Regency No: 660/580 / Bpdl-II.2 / XIII / 2007 dated December 1st, 2007 concerning Approval of EIA, and documents RKL/RPL Plantation covering 6,650 Ha and Palm Oil Processing Plant (Capacity 60 ton FFB / hour) Located in Sungai Rangit Jaya Village, Lada Mandala Jaya and Pangkalan Durin, Pangkalan Lada Sub-district, and Kotawaringin Barat District.</p> <p>Recommendations on UKL / UPL regarding construction of PT SSS Biogas Plant from Kotawaringin Barat District Environmental Agency No. 660/870 / BLH.II / II / 2012 dated December 20th, 2012 and signed by Head of Environment Agency District of Kotawaringin Barat. The preparation team of UKL-UPL is PT Pasadena Engineering Indonesia. Team Leader Ir. Yuyun Mulyani (EIA Certificate 1 & B) and certificate the team leader of the EIA Competence. Location Biogas Plant is located in the Village of Sungai Rangit Jaya Sub district Pangkalan Lada Kotawaringin Barat Regency Central Kalimantan Province.</p> <p>Evidence of community involvement in the AMDAL preparation process:</p> <ul style="list-style-type: none"> • Technical consultation (stakeholder consultation) for the preparation of AMDAL, Dinas - December 1, 2007 which was attended by the Transportation Agency, Plantation Agency of Kotawaringin barat, the Health Office, Health and Development Agency and has been responded by the company. 		
5.1.2 & 5.1.3.		
<p>The company shows the <i>RKL / RPL</i> management & monitoring plan for semester I 2019 with details:</p> <ul style="list-style-type: none"> • Air quality (gas & dust). • Noise 		

- Will
- Vibration shock in buildings
- Soil
- Soil erosion
- Water quality
- Aquatic biota
- Physical quality of the road
- Job & business opportunities
- Community attitudes & perceptions
- Social jealousy
- Public unrest
- Public health

Based on the document review, it is known that environmental management and monitoring parameters have been included in the 2019 Semester I *RKL / RPL* implementation report. Evaluation of trends, critical points and compliance has been including in the implementation report.

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.

The management unit has identified HCV for Lada Estate and Runtu Estate in 2008, but the result of the identification is considered not to provide clear information as the base of the implementation stage, so the biodiversity internal team made the work program to complete the HCV identification result by making delineation of HCV area, baseline study and also liability disclosure to RSPO which has now entered the propose program for remediation and compensation. For RACP outside the scope of certification.

HCV Lada and Runtu Estate Documents:

- HCV scoping report 2006
- Conducted by Edutama Envirocare Institution November 2008 includes a Lada estate of 6500 ha and a Runtu estate.
- Considered not adequate
- Conducted based line study and HCV delineation (formal check) by Biodiversity Division Dept on 2012
- Since the previous HCS identification is not adequate PT SSS did disclosure of liability - RACP and LUCA.

Newsletter biodiversity division volume 1, July 2011 which informs identification and management HCV in PT SSS to Villager Representatives of Pangkalan Durin and Sungai Rangit Jaya Villages. Based line surveys and delineations are conducted by internal PT SSS in 2012 (Team Biodiversity).

5.2.2 & 5.2.4.

The company shows species list of wildlife documents of PT SSS year 2018 with details below:

Species	Status IUCN	Location
Amphibi & Reptilia		
<i>Limnonectes malesianus</i>	NT	Runtu Estate
<i>Limnonectes paramacrodon</i>	NT	Lada & Runtu Estate
<i>Ophiophagus hannah</i>	VU	Lada & Runtu Estate
<i>Phython breitensteini</i>	VU	Runtu Estate
<i>Cuora amboinensis</i>	VU	Lada & Runtu
<i>Notochelys platynota</i>	VU	Runtu Estate

<i>Sibrenkociella crassicolis</i>	VU	Lada & Runtu Estate
<i>Amyda cartilaginea</i>	VU	Runtu Estate
<i>Orlitia borneensis</i>	EN	Runtu Estate
<i>Tomistoma schlegelii</i>	EN	Runtu Estate
Mammals		
<i>Maxomys whiteheadi</i>	VU	Runtu Estate
<i>Cynogale bennettii</i>	EN	Runtu Estate
<i>Lutra sumatrana</i>	EN	Lada & Runtu Estate
<i>Manis javanica</i>	CR	Lada & Runtu Estate
<i>Pongo pygmaeus</i>	CR	Lada & Runtu Estate
<i>Prionailurus linsang</i>	EN	Runtu
Birds		
<i>Ciconia stormi</i>	EN	Runtu Estate
<p>In the HCV Management Plan document period 2014-2020, among others:</p> <ul style="list-style-type: none"> • Baseline biodiversity data base for Lada Estate area in October - November 2017. • Rehabilitation landscape area. • Enrichment and monitoring of the corridor area. • Patrols in HCV areas that include encounter data with animals, species status, patrol activities. • And others. <p>There is matrix of HCV Management plan for period 2020 it's include outputs (activity areas and activities), PIC, date, and others.</p> <p>Observations in conservation areas (rehabilitation) in Runtu Estate is a swamp area, where it has been planted back in an effort to reforest the area.</p> <p>5.2.3. The Company showed a policy of no tolerance in killing or destroying protected flora and fauna dated December 10th, 2015. PT SSS is committed to protecting and preserving its natural resources and ecosystem according to Law No.5 of 1990. And government regulations 7 of 1999 concerning preservation of plant and wildlife species.</p> <p>The company shows socialization of conservation & environment to Runtu Estate South Division workers on August 24th, 2019 as many as 204 people (pesticide applicators, fertilizer applicators, maintenance, pruning, checkers, drivers, harvesters, etc.). Based on field observation in Housing of Runtu South; Housing of Lada Estate afdeling 2 and interview with pesticide applicators in Block E01 Runtu Estate and fertilizer applicators in block 93/94 Division II there aren't workers who found to capture, harm and collect. They have been socialized about the prohibition of hunting wildlife.</p> <p>5.2.5. Based on interviews with surrounding communities and maps of HCV areas, area local communities do not overlap with the company's HCV areas.</p>		
Status: Comply		
5.3		
Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.		
5.3.1 & 5.3.3.		
The company shows identification of waste sources for the 2019 period which informs the types of waste, sources, ways of management, action plans to reduce, PIC, Reviewers and timeline. For example: waste seals, stationary marks (paper,		

ballpoint & pencil) and printer ribbons (weighbridge); organic waste, rocks, soil, seals / sacks (sourced from FFB transport trucks) collected by grading officers and disposed of in appropriate places; Liquid waste is streamed to WWTP; oil & grease sourced from transportation & engine operations in the loading ramp are collected and submitted to schedule waste; fiber is collected and used for boiler fuel, etc.

Sources of air pollution include emission from fertilizer using, emission from fuel using, transportation emission, using of generator and others. There is management for emission such as substitution of chemical, reduction chemical and fertilizer, maintenance equipment of operational mil, maintenance of transportation, forbidden of using chemical in riparian area and others.

5.3.2.

Runtu Estate Schedule Waste storage permit.

PT Surya Sawit Sejati - Runtu Estate schedule waste storage permits number 553/009 / LH / DPMPTSP.D April 16, 2019 is valid for 5 years. This storage area measuring 5 m x 7 m x 4 m is located at coordinates S 02°22,776 " & E 111°43,559".

Lada Estate Schedule Waste storage permit.

PT Surya Sawit Sejati - Lada Estate schedule waste storage permits number 503/020 / LH / DPMPTSP.D is in accordance with the decision of the One Stop Investment and Integrated Services Office from October 31st, 2019, valid for 5 years. This storage 20 m x 10 m x 4 m is located at the coordinate point S 02°34'47.6" & E 111°46'25'2".

Schedule waste and non-schedule waste management cooperation agreement with number 031 / SPK-SSS / IV / 2019 dated April 6th, 2019 between PT Surya Sawit Sejati and PT Semesta Langgeng Sentosa. The term of the agreement is from 6 April 2019 - 5 April 2020.

The company shows evidence of schedule waste dispatch on 5, 6 & 9 April 2019 by PT Semesta Langgeng Sentosa with details:

1. Manifest AZG 0000649 number of 443 kg hazardous waste packaging (Vehicle number KH 8152 EN).
2. Manifest AZG 0000589 number of 42 kg of medical waste (Vehicle number KH 8458 GM).
3. Manifest AZG 0000668 number of 250 kg of laboratory waste (Vehicle number KH 8451 GM).
4. Manifest AZG 0000643 number of 568 kg of used hazardous waste packaging (Vehicle number KH 8460 GM).
5. Manifest AZG 0000738 number of 797 kg of hazardous waste packaging (Vehicle number KH 8470 GM).
6. Manifest AZG 0000737 number of 10 kg used battery (Vehicle number KH 8458 GM).
7. Manifest AZG 0000644 number of 83 kg electronic waste/ TL Lights (Vehicle number KH 8460 GM).
8. Manifest AZG 0000642 number of 157 kg of used rags, cloth rags and others (Vehicle number KH 8460 GM).
9. Manifest AZG 0000641 number of 75 kg OF used rags, cloth rags and others (Vehicle number KH 8460).
10. Manifest AZG 0000640 number of 21 drums of used lubricants & oil (Vehicle number KH 8460 GM).

Data Logbook for July 2019 - Lada Estate PT SSS with details:

Type of schedule waste	Balance (Kilogram)
Used grease	30
Chemical gallon	467.7
Oil filter	111.2
Used battery	153
Fertilizer sack	402.7
Rags	36
Used lubricants	1,937
TL Lights (Bulb)	47,2
Laboratory waste	52

Status: Comply

5.4

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

5.4.1.

The company show average of FFB production in 2019 as much as 23,796.63 ton; fiber efficient as much as 0.127 ton/ton FFB and Shell as much as 0.054 ton/ton FFB.

Status: Comply

5.5

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

5.5.1

The President Director issued the company's policy on unburned land clearance contained in environmental and biodiversity policy documents stating that planting and land clearing operations are completely zero burning and new plantings guided by RSPO principles and criteria.

SOP no. SSS-EST-02 on replanting is stated in Section 2 that land clearing is done by zero burning method taking into account environmental factors (soil and water conservation), LCC planting, and health, social. Based on company staff information, the last land clearing activity was conducted in 2009.

The Company states that the land clearing process is carried out mechanically without burning. This is evidenced by the recording of land clearing for example:

- Documentation of land clearing photos with heavy equipment in Block B16K and Block 9 Division 1 Lada Estate
- Letter of agreement between the company and land clearing contractor No. 001 / SPK-RE / UP-SSS / 2009 dated January 1, 2009 and no. No. 004 / SPK-RE / UP-SSS / 2009 dated 01 October 2009 states that the types of land clearing activities are entirely mechanically undertaken without fires, such as heavy equipment opening, stacking, trenching and road construction

5.5.2

The Company has a zero burning policy in both replanting activities and new planting and clearing activities. Land-burning activities for land and land clearance have been banned.

Status: Comply

5.6

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

5.6.1 & 5.6.2.

Sources of air pollution include emission from fertilizer using, emission form fuel using, transportation emission, using of generator and others. There is management for emission such as substitution of chemical, reduction chemical and fertilizer, maintenance equipment of operational mil, maintenance of transportation, forbidden of using chemical in riparian area and others. Based on field observations sighted that the warning signs has been installed in areas with high noise such as boiler station, engine room, sterilizer station and others.

5.6.3.

The testing results was conducted on May 27, 2019 by the Laboratory of PT Mutuagung Lestari ((LP 966 IDN). Based on noise testing at the engine room, boiler, kernel, press, tippler room, sterilizer room and loading ramp stations are more than the quality standard stipulated by Environment Minister Decree Number 48 of 1996. The company has made efforts to deal with this such as: the use of ear muffs, maintenance of operational machines and periodic audiometric testing.

The results of the odor and vibration tests do not exceed the quality standards stipulated by Decree of the Minister of Environment No. KEP.50 / MENLH / XI / 1996 and Environment Minister Decree number 49 of 1996 annex IV.

Summary of net GHG emissions from PalmGHG calculator

Summary of Emissions

Emissions per Product	tCO2e/t Product
CPO	0.73
PK	0.73

Production	ton/year
FFB processed	222,506
CPO produced	71,654
PK Produced	12,753

Land Use	Ha
Total planted area	44,238
Total planted on peat	4108.14
Conservation area	7687.5

Extraction	%
OER	22.92
KER	4.08

Summary of Plantation/field emissions and sink

Description	Own			Group			3 rd Party		
	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e/tFFB	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e/tFFB	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e/tFFB
Land conversion	55587.3	8.43	0.38	0	0	0	0	0	0
CO ₂ emission from fertiliser	18980.1	1.69	0.08	0	0	0	0	0	0
N ₂ O emission	20305.82	1.69	0.08	0	0	0	0	0	0
Fuel consumption	2699.14	0.24	0.01	0	0	0	0	0	0
Peat Oxidation	48288.46	5.07	0.23	0	0	0	0	0	0
Crop sequestration	-85869.01	-9.36	-0.42	0	0	0	0	0	0
Sequestration in conservation area	-62821.71	-1.46	-0.07	0	0	0	0	0	0
Total	-2829.89	6.3	0.29	0	0	0	0	0	0

Summary of Mill emission and credits

Description	tCO ₂	tCO ₂ e/tFFB
POME	5638.73	0.02
Fuel Consumption	559.45	0
Grid Electricity Utilisation	0	0
Exports of Excess Electricity to Housing & Grid	-2811.48	-0.01
Sale of PKS	-1418.5	0
Sale of EFB	0	0
Total	1905.2	0.01

Palm Oil Mill Effluent (POME) Treatment

Diverted to compost	0 %
Diverted to anaerobic digestion	100 %

POME Diverted to Anaerobic Digestion

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

The company has been calculating the GHG emissions using the latest RSPO PalmGHG calculator (3.0.1), all the data inputted are accurate. The calculation is including LUC emissions. Net GHG emissions produce by the mill is: 0.73 tCO₂e/tCPO.

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.
PT. Surya Sawit Sejati using Indonesian SEIA to gathering information regarding to monitoring and manage social cases. Those document has approved by Environmental Agency of Kotawaringin Barat District since December 1st 2007. Social aspect that should monitoring during the operational activity as written in environmental management plan/environmental monitoring plan (RKL/RPL) such as:

1. Working and striving opportunities.
2. Community restless.
3. Community income.
4. Public health quality.

Whole aspect above was monitored at Sungai Rangit Jaya, Lada Mandala Jaya and Pangkalan Durin Village every semester during recruitment and operational activities.

Based on environmental management plan/environmental monitoring plan (RKL/RPL) document above, the company has set several aspects that has done by the management as follows:

1. Education:
 - a. Scholarship
 - b. Procurement of textbook
 - c. Head master and teacher training
 - d. Fishery training (integrated with village profit organization).
 - e. Fish breeder
2. Healthy
 - a. Training for midwifery, paramedic and health maternal and baby pos.
 - b. Family planning
3. Infrastructure
 - a. Road and bridge maintenance.
4. Religion
 - a. Breaking the fasting together.
 - b. Worship place maintenance.

5. Social and culture.
 - a. Ramadhan program.
 - b. Independence day donation
 - c. Village head training
 - d. Customary party of Benaning sub-village.
6. Working and striving opportunities.
Job opportunity information.

6.1.2 & 6.1.3.

Those SIA assessment has involving the villager. The company has showed the document of stakeholder consultation on July 21st 2007. It also attended by government staff from plantation agency, transportation agency, District Environmental Impact Management Agency, NGO etc. Smallholder also involved in those assessment.

6.1.4 & 6.1.5

The company has reviewed the Social Impact Assessment dated 12 August 2019, there are social impact management plan. For example:

1. Conflict with villagers related to the border. With action plan comply with procedures regarding complaints, unscheduled border check inspection.
2. Disposed waste doesn't meet the quality standard parameters in accordance to the regulations. With action plan monitoring the quality of effluent pond regularly, periodic cleaning in the effluent pond system.

The CH has conducted stakeholders meeting on 24 July 2019 with attended by 203 persons from internal and external parties, including smallholders.

	Status: Comply	
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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

The company has had procedure of communication with stakeholder (SOP SSS-01-HMS-15) that approved by President Director since January 1st 2015. Those procedures consist complaint receipt, complaint handling/settlement, grievance settlement measures, and stakeholder meetings.

Stakeholder meeting conducted annually. The last meeting stakeholder was held on July 24, 2019 in Lada Estate Badminton Hall. During the session, there is a question and answer session. The company has appointed their staff as communication and consultation in charge since April 1st 2014. They also had stakeholder list as explain in 1.1.1. Based on interview with related stakeholder, the company has follow up the result of stakeholder meeting. For example, improving good communication with stakeholder, corporate social responsibility etc.

	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

Companies that have a system to deal with complaints contained in:

- SOP for stakeholder communication and consultation with no. SOP SSS-01-HMS-15
- SOP for Internal and External Complaints with SOP number: SOP-HRD-07-R00
- SOP Settlement of land disputes with SOP No: SSS-COMDEV (HMS) -024

Commitment has been demonstrated regarding reporting of violations (whistleblowers) signed by the President Director dated December 13, 2017. In point 4 reads: "If the reporter does not want to be identified, the company will keep the

identity confidential, except if required by the court".

Based on interviews with management there is an officer responsible for receiving complaints, namely the company's public relations staff. Forms of socialization procedures include stakeholder meetings that are routinely held every year. Stakeholder meetings for the 2019 period will take place on July 24.

6.3.2

The company has documented monitoring complaint and incoming and outgoing mail. During 2019 there were no complaints from external parties. There are more complaints from internal parties, for example on May 3, 2019 about the existence of a septic tank leak in the Afdeling 2 Lada Estate housing. The letter was responded to on May 4, 2019 with the response to be checked and an improvement plan by CE (Civil Engineering) on May 5, 2019.

Status: Comply

6.4

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

6.4.1; 6.4.2 & 6.4.3

The company has had land compensation procedure (No. SOP – HRD – 015 – ROO) that approved by President Director dated on January 1st 2016. This procedure for ensuring the person/party entitled to compensation is through the historical search of land ownership by gathering information from community leaders and village officials or from the land ownership document review.

Based on document review, the results of interviews with community representatives, previous land owners from Runtu and Sungai Rangit Jaya Village; and also interviews with management staff found that the land compensation process was conducted in a closed negotiation. The land owner proposes a compensation value to be negotiated for agreement.

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

Basic wage is used by the company are:

- Decree of the Governor of Central Kalimantan Number 49 of 2018 concerning Provincial Minimum Wages in 2019 Central Kalimantan Province dated November 1, 2018 stipulates that the provincial minimum wage in 2019 is Rp 2,663,435.5.
- Decree of the Governor of Central Kalimantan No. 51 of 2018 dated November 21, 2018 concerning Regency / City Minimum Wages and Regency / City Sectoral Minimum Wages in Central Kalimantan Province stipulating that the *UMSP* applicable since January 1, 2019 is Rp 2,965,514.00

The wage used is *UMSP* which is Rp 2,965,514.00. The company also shows the structure and scale of wages of PT Surya Sawit Sejati as conveyed in letter Number: 470a / HRD / EKS / UP-PTSSS / XI / 2018 to the Head of the Manpower and Transmigration Office of Kotawaringin Barat Regency on November 5, 2018. level F workers (Security, Field Workers, Foreman, Office Boy, etc) the lowest wage is IDR 2,965,514.00 and the highest is IDR 3,500,000.00

There is an example of a payment slip for ED016 employees for boiler workers with the following wage details:

Basic salary: 2,976,081 idr

Wage Scale based on Work Period: 9,500 IDR

Overtime payment/hour → (2.976.081 IDR + 9,500 IDR)/173 = 17,257.69 IDR

Overtime Payment: **1,069,977 IDR** with details of the first hour overtime (1.5) 20 hours and the second hour overtime (2.00) 16 hours so that the number of hours overtime paid is 62 hours

However, based on observed evidence such as:

- As a basic wage companies use *UMSP*
 - In accordance with the Decree of the Governor of Central Kalimantan No. 51 of 2018 dated 21 November 2018, the Regency / City Sectoral Minimum Wage in the province of Central Kalimantan as of January 1, 2019 is 2,965,514.00 IDR
 - Government Regulation No.78 of 2015 concerning Wages includes stating:

Article 13 states that in the case wages are set daily for companies with a work system of 6 days a week wages a month divided by 25 (twenty-five);

Article 15 states that wages based on unit yields are determined in accordance with agreed work results

Article 41 states that the lowest monthly wages consist of wages without benefits or basic wages with fixed allowances;
 - **Article 35 states** that in the case of workers' wages paid on the basis of a piece / piece or commission, the daily income is the same as the average daily income for the last 12 months provided that it cannot be less than the minimum wage requirement
 - The current minimum daily wage as explained by the accompanying officer is *UMSP* / Number of dates per month
- Based on the September 2019 salary slip found the following information:
 - The number of days in September is 30
 - Daily wage for *KHT* is 2,965,514.00 IDR - / 30 days = 98,850.5 IDR

Sampling of employee salary slip RH01729 for September 2019 (Harvesters);

The working starting date is September 09.

From September 9 to September 30 there are 22 Calendar Days

Absent 3 Days

Daily salary / 10 day salary → 988,505 idr

Pruning payment → 525 oil palm tree 3,432 idr

Buffalo Harvesting → **9 days**; Tonage **9.659 Ton**; **434,655 IDR**. So Wages Per day when using wages with a yield unit is 45,000.00 idr

The total daily work income plus a piece of work is 1,426,592 idr

The wage that should be paid within 19 working days is 1,878,158.867 IDR
- **Lada POM employee trainee wage payment slips:**

ED133

Basic salary **2.965.514 idr**

Wage deduction : Absent (1 day) **Rp 98.850 + JHT 59,310 + BPJS Kesehatan 28,085 + BPJS Pensiun**

Wages received 2,750,000.00 idr (2,965,515 idr - **98,850 idr** - 59,310 idr - 28,085 idr)

Even though in that period the workers worked **full time** (25 days work + 5 Sundays Sundays are considered working day because it uses divider 30 for daily wage). **There are deductions due to national holidays on Sundays so the system cuts the wages of workers**
- Wages paid are not in accordance with regulation

Thus it can be concluded that the remuneration system shown by the company is not in accordance with applicable labor regulations, for example PP No. 78 of 2015 concerning wages. **Nonconformity No. 2019.04.**

6.5.2

The company shows a Decree of the Head of the Manpower and Transmigration Office of Kotawaringin Barat Number: KEP.27 / DTT / HIJ-SYAKER / I / 2018 regarding PKB registration between the leaders of PT Surya Sawit Sejati and PUK.FSPPP-SPSI PT Surya Sawit Sejati on January 15 2018. PKB is valid for 2 years since it was ratified. *PKB* is agreed on approval, guarantees and granting to workers, work relations, working days, rest and overtime, exemption from work, OSH and the environment, wages, social security and welfare, social security, facilities for workers, work order, termination of relations Work and Termination of Employment and Worker Complaints.

The company also showed a Joint Work Agreement Letter Number: 005 / SKKB / SSS / PKS / General / VIII / 2019

between PT Surya Sawit Sejati Lada Engineering Department dated August 8, 2019 with Ahmad Nurhamid and number 009 / SKKB / SSS / PKS / General / VIII / 2019 with Benianto regarding the probation period for the position of the process operator. The letter mentions workers' rights and obligations, length of probation (3 months and can be extended for no more than 3 months), health checks, transfers, hours of work, income tax, health insurance, leave, and the consequences of violations up to work termination. There is an example of a job application on behalf of Ahmad Nurhamid on 26 June 2019 with a complete copy of diploma documents, photocopy of ID card, photocopy of family card, curriculum vitae, passport photo, and photocopy of police record certificate.

The company shows a list of employee facilities & infrastructure for 2019, including:

Lada Estate:

- Shop Houses 2 unit.
- Karya Mulia Sejahtera Cooperation 1 unit.
- Islamic Prayer Room 1 unit.
- Mont Blanc Estate 1 unit.
- Kindergarten 1 unit
- Motorcycle parking 1 unit.
- Lada POM islamic prayer room 1 unit.
- Lada POM canteen 1 unit.
- Toilet 6 unit.
- Toilet 4 (Lada POM).
- Sport facilities 2 unit (Volley and football).

Runtu Estate:

- Fertilizer warehouse: 1 unit
- Office: 1 unit
- Solar tank: 1 unit
- G2 house: 2 bungalows
- G4 house: 3 units of staff, and 1 unit of workers
- G6 house: 31 units of workers
- Genset House: 2 units
- Water Treatment: 3 units
- Islamic Prayer Room: 1 unit
- Church: 1 unit
- Daycare: 1 unit
- Employee Cooperative: 1 unit

Field observations to residential areas. Lada Estate 2 is known to have facilities for employee drinking water. Domestic waste is transported every 2 times a week and polyclinics are available for treatment, school buses, kindergartens, day care centers, and others. Sanitation and housing conditions are very good.

6.5.4

Based on interviews with employees during a field visit to Lada 2 housing, it is known that access to basic goods can be easily reached, for example through employee cooperatives and food stalls. In addition, the distance to the regency city is also not far which is about 45 minutes if using a motorcycle.

6.5.1	Status: Nonconformity No. 2019.04 with major category
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6.6

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

6.6.1.

The company has a Human Rights Policy signed by the President Director on January 13, 2016 which among others states that it respects the right of all employees to participate and participate in registered trade unions and to bargain collectively. There is a composition of the Agricultural and Plantation Workers Union of All Indonesian Workers Union 2017-2022 service period in accordance with SK No. 096 / PC-FSPPP-SPSI / KTB / VII / 2017 dated July 14, 2017. As of 31 August 2019 the number of worker union members is 75 people.

The results of an interview with the secretary of PUK.FSPPP-SPSI PT Surya Sawit Sejati on October 8, 2019 found that the union was in a vacuum because there were no employees who were willing to become chairman. The company always gives encouragement and support in reactivating labour union, for example by facilitating meetings. But until 2019 there has been no response from employees for active activities in the union. This is in accordance with the information in the minutes of the Meeting on 19 September 2018 regarding the labour union Chairman's Vacancies and the Election of New Chairmen. The meeting was attended by 12 participants from representatives of employers and labour unions. The results of the meeting of them said they would.

6.6.2

When ASA-1 was carried out the condition of the Workers Union was in a vacuum due to the fact that there were no people who were willing to become the chair of the union. This was stated in the minutes of the Meeting on 19 September 2018 on the labour unions Chairman's Vacancies and the Election of New Chairmen. The meeting was attended by 12 participants from representatives of employers and labour unions. Among the results of the meeting stated that they would try to elect a new chairperson so that management could run again.

The company has supported labour union activities, for example by facilitating meetings, providing infrastructure, and assistance in terms of organizational development, but as stated by the secretary of the PT SSS labour Union until October 8, 2019, no one was willing to be the main organizer so that activities in vacuum state.

Status: Comply

6.7

Children are not employed or exploited.

6.7.1

As stated in the policy on age requirements (in the human rights policy) dated March 23 2014 point 7 which states: "We will not tolerate the use of children as forced laborers or slaves, slavery or human smuggling in our plantations and facilities. In accordance with Labor Regulations in Indonesia, workers are at least 18 years old at the time of admission"

In addition, Article 12 of the Collective Labor Agreement for companies in the period 2018-2020 states that one of the age requirements for workers who are accepted is at least 18 years of age at the time of admission. The warnings about the age limit of workers have been posted in strategic places such as division offices and guard posts. Based on a review of PT Surya Sawit Sejati's employee data documents and the results of field visits and interviews with workers, there are no workers who violate the minimum age requirement for work that is permitted.

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

The PT SSS Human Rights Policy, which was signed by the President Director on December 10, 2015, point 2 states that the company provides equal opportunities and treatment for everyone to get a job at PT SSS. he company also has a non-discrimination policy contained in a gender policy stating that: "PT SSS is committed to maintaining a workplace that is free from any type of interference, including disorders based on nationality, color, religion, gender, country of origin, ancestry, record, marital status and sexual orientation, in accordance with our policy, ..." "The policy has been socialized to all stakeholders through stakeholder meeting activities (Internal and External) on July 24, 2019.

Based on interviews with community representatives in Runtu Village and Sungai Rangit Jaya Village, it was found that there was never discrimination and equal opportunities had been given, for example in terms of job vacancy information. The results of interviews with field workers at Lada Estate, Lada POM, and Runtu Estate revealed that some of the composition of workers came from neighboring villages such as Runtu Village and Sungai Rangit Jaya Village.

6.8.2.

Based on interviews with workers, so far there has never been a report related to allegations of discrimination. Everyone has the opportunity to obtain work information through the requirements and performance appraisal of workers.

There are several examples of employee appraisal and promotion, for example letter Number: 003 / SSS / HRD-Prom? I / 2019 dated January 1, 2019 regarding employee promotion with NIK: LE60846 from Kerani RSPO to RSPO Staff probation. Promotion is based on employee annual performance appraisal.

6.8.3.

Assessment for the workforce. In the workforce recruitment mechanism, selection and recruitment assessments include: work readiness, work skills, ability to work in groups or independently, can pursue the targets that have been given, able to adapt to the work environment, maximum age limit and continued with medical examinations by the company clinic.

Whereas in the labor assessment mechanism, items assessed include: quality of work, quantity of work, knowledge of duties, responsibilities, work initiatives, cooperation, communication, leadership, problem analysis skills, and discipline. The results of the employee appraisal are used to handle employees, including promotions and employee transfers.

Status: Comply

6.9

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

6.9.1

The company has a policy to prevent all forms of sexual harassment and violence and has been implemented and communicated to all workers for example by supporting and encouraging the formation of a gender committee. The composition of the gender committee of PT Surya Sawit Sejati is the chairman, secretary, and 9 members who are representatives of Lada Estate, Lada POM, and Runtu Estate. In addition, the company also has a Gender Committee No. SOP-HRD-014-ROO dated January 1, 2016. The procedure has explained the stages in the complaint and handling if there are cases of sexual harassment

Based on the interviews with representatives of women workers in Lada Estate and Runtu Estate, it is known that protection of women workers includes the establishment of a gender committee. The female worker representative also said that there had never been any cases of sexual harassment.

6.9.2

All policies of PT Surya Sawit Sejati such as policies on reproductive rights, sexual harassment, and human rights policies are routinely delivered once a year through stakeholder meetings. For the 2019 period, stakeholder meeting activities will take place on July 24th, 2019.

The implementation of the policy includes giving H-1 and H-2 leave and establishing a gender committee to deal with women's issues. In addition, there is a policy that pregnant and breastfeeding women are not permitted to work with chemicals as described in 4.6.12. Based on interviews with representatives of female workers Lada Estate, Lada POM, and Runtu Estate, it is known that the rights of women workers such as H-1 and H-2 leave and protection from sexual harassment have been accommodated by the company.

6.9.3.

There is a special complaint mechanism that respects anonymity and protects whalers who want to be protected in the form of a SOP on the grievance and sexual harassment mechanism (Gender Committee) established on January 1, 2016

with no. SOP-HRD-014-ROO approved by the President Director. There was a socialization on the mechanism of complaints and sexual harassment, which was carried out on July 24, 2019 at the Lada Office which was attended by 23 participants. In the minutes, in addition to conveying the mechanism for submitting complaints / complaints, also discussed the complaints received from each division representative. The composition of the gender committee has not changed since it was first approved in 2015 with the main PIC Mrs. Suharti.

Status: Comply

6.10
Growers and mills deal fairly and transparently with smallholders and other local businesses.
6.10.1 & 6.10.2.

Based on document verification, smallholder FFB payments are made referring to the price set by the FFB pricing committee for smallholder production in Central Kalimantan which is updated monthly. Based on data of FFB price in July and August 2019 set on of IDR 1,140.03/Kg and 1,260.91/Kg respectively. The calculation results of plasma production by the bank transfer. The results of interviews with representatives of smallholders are known that until now there are no complaints related to the payment of plasma production. All payments have been paid in accordance with the applicable and timely provisions.

6.10.3 & 6.10.4.

The CH were shown work agreement with several local contractors, for example:

- Agreement number 006/SPK-SSS/II/2019 dated 12 January 2019 with CV Bahri for loading FFB loading, FFB transport, EFB transport and Rent of Truck.
- Agreement number 012/SPK-SSS/II/2019 dated 2 January 2019 with CV Sungai Rangit Jaya for FFB loading, FFB transport, EFB transport and Rent of Truck.
- Agreement number 003/SPK/ED-PT.SSS/III/2019 dated 9 March 2019 with CV Hastina Graha Mandiri for Field Office painting, Laboratory painting, biodiversity and clinic painting.

Based on document verification and interview with several contractors sighted that payment are made a timely manner.

Status: Comply

6.11
Growers and millers contribute to local sustainable development wherever appropriate.
6.11.1 & 6.11.2.

The CH shown contribution to the development of surrounding communities, such as:

- Forest plant assistance to the BKSDA Region II of Kalimantan Tengah with 1,000 plants.
- Christmas celebration aid in Sungai Rangit Village and Pangkalan Durin Village.
- Scholarship for students from Elementary School of Medang Sari, Sulung Kenambui, Runtu, Umpan, Pangkalan Durin, and Pangkalan Lada quarterly.
- Teacher salaries in Elementary School of Pangkalan Durin, Sungai Rangit Jaya, Lada Mandala Jaya, and Sungai Melawen.
- Community development on honey bee keeping in at Umpang Village.
- Oil palm plantation with scheme smallholders with Koperasi Produsen Pulau Bananing Sejahtera and several local communities.

Status: Comply

6.12
No forms of forced or trafficked labour are used.
6.12.1; 6.12.2; 6.12.3

There is no use of trafficked or forced labor of any kind. Every workforce has been equipped with a clear work agreement and labor status. In addition, based on the list of PT SSS employees, there are no migrant workers who work at the company. Foreign workers are at the management level so there is no issue in human trafficking or forced labor.

	Status: Comply	
6.13 Growers and millers respect human rights		
6.13.1 The PT SSS Human Rights policy is available at the Rangit Jaya River on January 13, 2016 by the President Director. The Human Rights Policy states: "PT SSS is committed to protecting and advancing human rights wherever we operate. Our human rights base is based on our core values of environmental safety and health surveillance and respect for others. The policy has been regularly socialized every year in stakeholder meetings (internal and external). For the 2019 period the stakeholder meeting was held on July 24 th , 2019.		
	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. Based on the statement area, the company does not have a new planting plan because the first planting was done in 2004 and it is still quite long before the first cycle is completed.		
	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; 7.2.2 There is a soil map of Lada Estate with scale 1: 50.000 made by GIS team PT Surya Sawit Sejati. Map informs that there are 4 types of land in the company area ie peat, sour sulfate, inland soil, inland sandy soil, and flood prone areas. In areas that include the scope of the soil type assessment are inland soil and inland sandy soil. Based on topographic map and explanatory visit document report to four potential properties in January 2006 it is known that the slope condition in company operational area is generally flat to undulating. Topographic and soil survey maps are used as reference in water management planning on peat and acid sulfate areas. In the area included in the scope of the assessment (738.1 Ha) there is no fragile soil.		
	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; 7.3.3; 7.3.4 & 7.3.5. Based on the document review it is known that the company opened new plantings on November 2005, the Company has shown LUC Analysis verification result document for PT SSS as much as 5 unit management. HCV assessment on May 9, 2014 with a total area of 18,743.74 ha of management unit, total area of raw liability of 10,699.5 ha and total conservation liability area of 2,508.76 ha. The analysis method for LUCA is image analysis and EIA was done by Green Harvest Environmental Sdn Bhd. (Kumai Estate, Lada Estate and Runtu Estate). In addition, there is a letter from RSPO Compensation dated October 17, 2017 to PT SSS stating the compensation panel has deliberated. Then available replies from RSPO dated November 9, 2017 stating "Since PT Surya Sawit Sejati is still undergoing the RACP process, their concept has been submitted to the Compensation Panel for review. Only after the		

approval, the grower can proceed with developing the full compensation plan ". Furthermore, there is an email reply back from RSPO dated November 10, 2017 stating that the company is given 1 year to close the non-conformity ("since the closing for the NC is 1 year not 3 months).

Verification, 8 October 2019.

There is email from khing.suli@rspo.org dated on October, 4th 20 that informing "I would like to inform you that the Compensation Panel has reviewed the clarification provided by your good self and Dr Carl Traeholt, and I am pleased to convey that the Compensation Plan is approved by the Compensation Panel, but with follow up action points".

The company has shown supporting documents consist of:

1. Annex 7 Compensation Concept Note on Population Management of the endangered species.
Following the RSPO regulation and guidance, UP/PTSSS submitted a self-declaration liability and the final conservation liability amounted to an area measuring 2,508.76ha. According to the RSPO compensation guidelines, compensation can be meted out in various ways, amongst these;
 - Area based compensation in Indonesia@ buy land and maintain for ≥25years
 - Monetary equivalent compensation to external conservation organization
 - Internal conservation actions that meets the "additionally" criteria
2. Annex 8 Compensation Plan
 - Lada Estate.
 - Rehab Riparian (remediation) 74.46 ha.
 - Rehab Floodplain 50.8 ha.
 - Non-oil Palm Plantings on steep slope.
 - Rantau Estate
 - Rehabilitation Riparian (remediation) 15.59 ha.
 - Rehab Floodplain (Freshwater swamp 133.2 ha dan peat swamp 205.3 ha).
 - No oil palm plantings on steep slope.
3. 25 years' budget and timeline.
4. Clarification needed for compensation plan final on 27 September 2019.

	Status: Comply	
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7.4

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

7.4.1; 7.4.2

The Company has a land type map that informs the types of soil contained in the company area. There is a topographical map that states the condition of the slopes of land is flat bumpy. The area covered by the scope of certification is not identified as having marginal land or fragile land.

The company has committed through the policy of PT SSS President Director on environment and biodiversity dated March 23, 2013 stating that since 2010 there will be no new plantings on peatland. Based on the soil map owned by the company there is no marginal, marginal, or steep slopes in the acreage that includes the certification scope.

	Status: Comply	
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7.5

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

7.5.1.

PT Surya Sawit Sejati is a company that take over by United Plantation Group. So it does not have the initial document of land clearing. The Company can show the land compensation document which also describes the compensated land map and witnesses from the adjacent party / neighbour. Ownership of land in the permit area of the company is a community land that can be proven by the Letter of Property (SHM) or Land Certificate (SKT).

	Status: Comply	
7.6 Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their free, prior and informed consent and negotiated agreements.		
7.6.1; 7.6.2; 7.6.3; 7.6.4; 7.6.5; 7.6.6 <p>The company has had land compensation procedure (No. SOP – HRD – 015 – ROO) that approved by President Director dated on January 1st 2016. Based on document verification, there is one land disputes cases on 2017 in certification scope that has been resolved. Management has showed land compensation document and payment on November 10th 2017 via bank transfer. All document has written in Bahasa.</p> <p>Based on stakeholder consultation with village representative and national land staff, there is land disputes in certification scope so far.</p>		
	Status: Comply	
7.7 Use of fire in the preparation of new plantings is avoided other than in specific situations, as identified in the ASEAN guidelines or other regional best practice.		
7.7.1 <p>Land clearing operations are completely "zero burning" and new plantings are guided by RSPO principles and criteria. In SOP no. SSS-EST-02 on replanting is stated in Section 2 that land clearing is done by zero burning method taking into account environmental factors (soil and water conservation), LCC planting, health & social. Based on company staff information, the last land clearing activity was carried out in 2009. Field verification results indicate that there are no burning incidents at the time of land clearing.</p>		
7.7.2 <p>The Company prohibits new planting and replanting by burning. There has been a zero burning policy issued by the president director.</p>		
	Status: Comply	
7.8 New plantation developments are designed to minimise net greenhouse gas emissions.		
7.8.1 & 7.8.2. <p>Based on document review is known there is no land clearing above 2015.</p>		
	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.		
<p>Already have a Biogas Plant and Planting 16,330 staples of forest plants in 2018.</p>		
	Status: Comply	

3.4 Summary of Assessment Report of Supply Chain Requirement

3.2.1. General chain of custody requirements for the supply chain

Clause	Requirement
5.1	Applicability of the general chain of custody requirements for the supply chain
5.1.1	<p>The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. After the end product manufacturer, there is no further requirement for certification.</p> <p>There is physical handling of certified product given to third party for CPO and PK transport, as follows:</p> <ul style="list-style-type: none"> - CV Berkas Jaya as CPO transports, Jl A.Yani KM. 17 RT 11, Bumi Harjo Village, Kumai District, Kotawaringin Barat Regency, and Kalimantan Tengah Province.
	Status: Comply
5.1.2	<p>Traders and distributors require a license obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model.</p> <p>The mill not buying certified product from traders and/or distributor, all CSPO/CSPK sales is from its own produced.</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>Lada Mill has been registered in IT platform palmtrace RSPO https://palmtrace.rspo.org/web/rspo/member-directory which information as follows:</p> <ul style="list-style-type: none"> • Member name: Surya Sawit Sejati (Lada Palm Oil Mill) • Account UID: RSPO_AC100004019 • Core product: Palm Oil • Member ID: RSPO_PO10000083 • Member category: Oil Mill • GPS Coordinates: 111.772559, -2.590899 • Visiting address: <ul style="list-style-type: none"> ✓ Street: Ds. Pangkalan Durin, Kecamatan Pangkalan Lada. ✓ City: Kotawaringin Barat ✓ State: Central Kalimantan ✓ Country: Indonesia
	Status: Comply
5.1.4	<p>Processing aids do not need to be included within an organization's scope of certification.</p> <p>The Lada POM does not have any of processing and material aid along the processing lane.</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>

During the twelve months ago the Lada POM only received and processed FFB from certified sourcess and non certified which claimed as RSPO is as Mass Balance model.	
	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 Lada POM only use one supply chain model with Mass Balance Model.	
	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.	
Lada mill has had supply chain procedure through the document Module E – CPO Mills: Mass Balance that approved and signed by President Director of PT. Surya Sawit Sejati Revised on 11 December 2018. This procedure described the rules as follows:	
<ul style="list-style-type: none"> • Definition of Module E – Mass Balance • Objective • Standard • Planning: <ul style="list-style-type: none"> a. Separation of certified and noncertified product. b. Demarcation of field which certified (HGU) or noncertified (Non HGU) by yellow paint. c. Harvesting process, loading and transporting FFB (from certified or noncertified field) the certified stamp (Certified Sustainable FFB – MUTU-RSPO/123). If the majority of FFB is noncertified at one field, they will be downgrade as non-certified. d. FFB receiving in mill (if the certified and non certified FFB send on the one truck, the mass balance will be percentage by the bunch's, all FFB consignment from third parties will be stamp as Uncertified FFB. e. FFB processing in mill. f. Sales and dispatch g. Record keeping (the mill will be record all FFB received, CPO & PK dispatch regarding to real time basis).. h. Continuous improvement. 	
	Status: Comply
5.3.2	
The site shall have a written procedure to conduct annual internal audit	
Procedure to conduct internal audit for SCCS implementation has been defined by the mill, namely SOP of Internal Audit, which mentioned that internal audit shall be conducted annually to implement and maintain the respective standard requirements effectively, and including the SCCS standard in key station involved (purchasing FFB, processing, sales storage, delivery and shipping of certified product). The latest internal audit was conducted dated 21 to 29 August 2019 by Assistant Manager Sustainability. There is no nonconformity from this audit activity.	
	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 not buying certified product from any of suplier, all CSPO/CSPK sales is from its own production.	
	Status: Comply
5.4.2	
The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents	
The SOP Module E-CPO Mills: Mass Balance point 3.0 person in charge to handling certified and non certified products by weighbridge staff. Based on interview with the staff, he can be explaining about separated volume of certified and non-certified	

product from the estate to the mill. For example:	
<ul style="list-style-type: none"> - FFB consignment dated 17 September 2019 truck number: KH 1363 IB from Lada Estate, Division I, Field 004 Certified FFB: 311 bunch's, non certified: 91 bunch's. - FFB ticket No 220279 dated 17 September 2019 from Field 004, Division 1, FFB: 402 bunch's total: 6,540 Kg (Certified: 5,059 Kg & Non Certified: 1,481 Kg). 	
	Status: Comply
5.5	Outsourcing activities
5.5.1	<p>In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mill cannot outsource processing activities like refining or crushing.</p> <p>There is physical handling of certified product given to third parties, such as:</p> <ul style="list-style-type: none"> - CV Berkas Jaya as CPO transports, Jl A.Yani KM. 17 RT 11, Bumi Harjo Village, Kumai District, Kotawaringin Barat Regency, and Kalimantan Tengah Province.
	Status: Comply
5.5.2	<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. 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 has outsourcing within the scope of their RSPO Supply Chain certificate ensure, such as:</p> <ol style="list-style-type: none"> Legal ownership of CV Berkas Jaya as CPO transports Jl A.Yani KM. 17 RT 11, Bumi Harjo Village, Kumai District, Kotawaringin Barat Regency, and Kalimantan Tengah Province. CPO Transport agreement Number 031/SPK-CPO/SSS-CV.BK/VI/2019 dated 17 June 2019 with CV Berkas Karya period to 31 December 2019, from Lada POM to the PT SMART Bulking and PT Astra Bulking on Jl Pelabuhan CPO, Sungai Kalap, Kumai District, and Kotawaringin Barat Regency. There are statement letter by CV Berkas Karya dated 8 October 2019 which state that the contractor can be accessed by the CB's. The Lada POM has socialized to the CV Berkas Karya about RSPO SCCS dated 11 September 2019 with eight driver.
	Status: Comply
5.5.3	<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 contractors address and contact details are written in the agreement, such as: CV Berkas Jaya as CPO & PK transports, Jl A.Yani KM. 17 RT 11, Bumi Harjo Village, Kumai District, Kotawaringin Barat Regency, Kalimantan Tengah Province.</p>
	Status: Comply
5.5.4	<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 additional contractor used since last year.</p>
	Status: Comply

5.6	Sales and goods out	
5.6.1		
The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form: The name and address of the buyer		
Based on document verification and interview with the financial controller sighted that Lada POM didn't claim RSPO products sales, the certified products were sold as conventional. However the information of buyer are describes in the sales contract document and delivery order, for example observed the sales contract:		
<ul style="list-style-type: none">- Delivery Order No 038/CPO/ED-PTSSS/IX/2019 dated 21 September 2019 for CPO sales contract No. S-CPO.36/09.19 by PT SMART, Tbk with quantity: 1,000 MT transport by CV Berkas Jaya.- Delivery Order No 030/PK/ED-PTSSS/IX/2019 dated 19 September 2019 for PK sales contract No. KTN-PK.15/09.19 by PT Kurnia Tunggal Nugraha transport by buyer.		
	Status: Comply	
5.7	Registration of transactions	
5.7.1		
Supply chain actors who:		
<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		
Lada Mill has been registered in IT platform palmtrace RSPO https://palmtrace.rspo.org/web/rspo/member-directory which information as follows:		
<ul style="list-style-type: none">• Member name: Surya Sawit Sejati (Lada Palm Oil Mill)• Account UID: RSPO_AC100004019• Core product: Palm Oil• Member ID: RSPO_PO10000083• Member category: Oil Mill• GPS Coordinates: 111.772559, -2.590899• Visiting address:<ul style="list-style-type: none">✓ Street: Ds. Pangkalan Durin, Kecamatan Pangkalan Lada.✓ City: Kotawaringin Barat✓ State: Central Kalimantan✓ Country: Indonesia.		
	Status: Comply	
5.7.2		
The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:		
<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.		
Based on document verification and interview with the Lada POM Management sighted that they had been certified since dated 27 November 2018, however during last year there are no RSPO certified products claim sold. All of RSPO certified products were sold as conventional and remove on palm trace dated 8 October 2019.		
Product	Transaction ID (removed)	Volume (MT)

CSPO	ST-TR-cf36f61f-469	2,145	
CSPK	ST-TR-5e514179-9741	409	
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 plan of SCCS training are mentioned in procedure point 1.4 that training will be conducted by Mill Manager to the key persons every year. The latest SCCS training were conducted on 13 March 2019 to 10 workers (weighbridge operator, clerk, mill office, and processing supervisor and also dated 12 August 2019 to 19 Estate staff.			
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			
The latest SCCS training were conducted on 13 March 2019 to 10 workers (weighbridge operator, clerk, mill office, and processing supervisor and also dated 12 August 2019 to 19 Estate staff.			
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			
The Lada POM has maintain accurate, complete and up-to-date records and reports, for example:			
<ul style="list-style-type: none">- Record keeping of FFB received, CPO sales and PK sales.- Agreement with CPO transporter- Record of CPO sales contract and PK sales contract, etc.			
Based on interview with the mill manager and SCCS PIC, sighted that the company start claims RSPO product from January 2019. See on below table:			
FFB			
Month	Certified (MT)	Non Certified (MT)	Total (MT)
October 2018	-	29,419.35	29,419.35
November 2018	-	24,995.39	24,995.39
December 2018	-	22,549.09	22,549.09
January 2019	1,657.44	20,133.40	21,790.84
February 2019	1,264.03	19,227.23	20,491.26
March 2019	1,290.52	21,998.67	23,289.19
April 2019	1,106.28	21,732.01	22,838.29
May 2019	523.39	16,950.39	17,473.78
June 2019	1,309.79	28,575.72	29,885.51
July 2019	1,296.68	27,818.05	29,114.73
August 2019	1,147.49	24,358.78	25,506.27
September 2019	1,120.13	22,659.63	23,779.76
Total	10,715.75	280,417.71	291,133.46
CPO			
Month	Certified (MT)	Non Certified (MT)	Total (MT)
October 2018	-	6,729.62	6,729.62

November 2018	-	5,549.27	5,549.27
December 2018	-	5,071.91	5,071.91
January 2019	384.42	4,612.25	4,996.67
February 2019	288.58	4,345.52	4,634.10
March 2019	291.62	4,971.08	5,262.70
April 2019	244.52	4,803.34	5,047.86
May 2019	114.59	3,710.91	3,825.50
June 2019	276.25	6,026.95	6,303.20
July 2019	281.61	6,041.44	6,323.04
August 2019	262.96	5,582.09	5,845.05
September 2019	255.44	5,167.31	5,422.74
Total	2,399.99	62,611.69	65,011.66

PK

Month	Certified (MT)	Non Certified (MT)	Total (MT)
October 2018	-	1,233.12	1,233.12
November 2018	-	1,074.23	1,074.23
December 2018	-	857.17	857.17
January 2019	66.06	792.6	858.66
February 2019	51.99	782.95	834.95
March 2019	55.02	937.8	992.82
April 2019	47.31	929.41	976.73
May 2019	22.74	736.52	759.26
June 2019	55.62	1,213.46	1,269.08
July 2019	56.48	1,211.74	1,268.22
August 2019	53.43	1,134.14	1,187.57
September 2019	54.46	1,101.74	1,156.20
Total	463.12	12,004.88	12,732.78

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

SOP Module E-CPO Mills: Mass Balance point 7.0 about retention time for all records is two years. For example: CPO consignment ticket No 113608 dated 13 October 2017 by CV Berkas Karya Contract no S-CPO.41/09.17 with volume 14,880 Kg.

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 projection of certified products that could potentially be produced by the Lada POM presented as below:

Product	Projection during 28 November 2019 to 27 November 2020
FFB	92,720
CSPO	21,790
CSPK	4,170

Status: Comply
5.10 Conversion factors

5.10.1	Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org); RSPO Rules for Physical Transition of Oleochemicals and its Derivatives. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries
The mill didn't use conversion factors.	
	Status: Comply
5.10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.
The mill didn't use conversion factors.	
	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 has been make according to RSPO Rules on Market Communications and Claims, there is no found any use of trademark and logo in Lada POM activity.	
	Status: Comply
5.12	Complaints
5.12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.
The handling of stakeholder complaints including those relating to complaints from product sales is explained in the communication procedure and the submission of complaints on the SOP SOP : SSS-COMDEV(HMS)-024 Complaint from stakeholders.	
During last year there are two complaints from PK buyer (PT Binasawit Abadipratama) Bumiharjo Storage dated 16 September 2019. It has been verified by Weighbridge Staff on the same day, the conclusion is complaint rejected by the company. There is minute of meeting were signed by both of parties.	
	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
The last management review conducted on 18 September 2019 with 18 members (President Director, GM Estate & Mill, Mill & Estate Manager, Assistant Manager, etc. There are no issues related to the SCCS that need to be determined by the action plan based on the results of the management review.	
	Status: Comply
5.13.2	<p>The input to management review shall include information on:</p> <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.
The last management review conducted on 18 September 2019 with 18 members (President Direcotr, GM Estate & Mill, Mill & Estate Manager, Assistant Manager, etc. There are no issues related to the SCCS that need to be determined by the action	

plan based on the results of the management review.	
	Status: Comply
<p>5.13.3</p> <p>The output from the management review shall include any decisions and actions related to:</p> <ul style="list-style-type: none"> • Improvement of the effectiveness of the management system and its processes. • Resource needs. 	
<p>The last management review conducted on 18 September 2019 with 18 members (President Director, GM Estate & Mill, Mill & Estate Manager, Assistant Manager, etc. There are no issues related to the SCCS that need to be determined by the action plan based on the results of the management review.</p>	
	Status: Comply

3.2.2. Module E – CPO Mills: Mass Balance Requirements

Clause	(Module E) CPO Mills - Mass Balance Requirements													
E.1	Definition													
E.1.1														
Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and volume sales of RSPO certified producers. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.														
Lada Mill receiving FFB from outside certification scope. Therefore, mill will using Module E (Mass Balance).														
	Status: comply													
E.2	Explanation													
E.2.1														
The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the CB in the public summary of the P&C certification report. This figure represents the total volume of certified palm oil product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced should then be recorded in each subsequent annual surveillance report.														
The company has been shown their FFB production that comes from scope of certification (certified area) as follows:														
	<table><tr><th>Item</th><th>*Actual from January to September 2019 (ton)</th><th>Production estimated for 27 November 2019 to 26 November 2020 (ton)</th></tr><tr><td>FFB</td><td>10,715.75</td><td>92,720</td></tr><tr><td>CPO</td><td>2,399.99</td><td>21,790</td></tr><tr><td>PK</td><td>463.12</td><td>4,170</td></tr></table>	Item	*Actual from January to September 2019 (ton)	Production estimated for 27 November 2019 to 26 November 2020 (ton)	FFB	10,715.75	92,720	CPO	2,399.99	21,790	PK	463.12	4,170	
Item	*Actual from January to September 2019 (ton)	Production estimated for 27 November 2019 to 26 November 2020 (ton)												
FFB	10,715.75	92,720												
CPO	2,399.99	21,790												
PK	463.12	4,170												
Note:* the Lada POM was certified on 28 November 2018, however started claim RSPO products per January 2019.														
	Status: comply													
E.2.2														
The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).														
Lada Mill has been registered in IT platform palmtrace RSPO https://palmtrace.rspo.org/web/rspo/member-directory which information as follows:														
<ul style="list-style-type: none">Member name: Surya Sawit Sejati (Lada Palm Oil Mill)Account UID: RSPO_AC100004019Core product: Palm OilMember ID: RSPO_PO10000083Member category: Oil MillGPS Coordinates: 111.772559, -2.590899Visiting address:<ul style="list-style-type: none">✓ Street: Ds. Pangkalan Durin, Kecamatan Pangkalan Lada.✓ City: Kotawaringin Barat.✓ State: Central Kalimantan.✓ Country: Indonesia.														
	Status: Comply													

E.3	Documented procedures
E.3.1	<p>The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:</p> <ol style="list-style-type: none"> Complete and up to date procedures covering the implementation of all the elements in these requirements; The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site procedures for the implementation of this standard. <p>Lada mill has had supply chain procedure through the document Module E – CPO Mills: Mass Balance that approved and signed by President Director of PT. Surya Sawit Sejati Revised on 11 December 2018. This procedure described the rules as follows:</p> <ul style="list-style-type: none"> Definition of Module E – Mass Balance Objective Standard Planning: <ol style="list-style-type: none"> Separation of certified and noncertified product. Demarcation of field which certified (HGU) or noncertified (Non HGU) by yellow paint. Harvesting process, loading and transporting FFB (from certified or noncertified field) the certified stamp (Certified Sustainable FFB – MUTU-RSPO/123). If the majority of FFB is noncertified at one field, they will be downgrade as non certified. FFB receiving in mill (if the certified and non certified FFB send on the one truck, the mass balance will be percentage by the bunch's, all FFB consignment from third parties will be stamp as Uncertified FFB. FFB processing in mill. Sales and dispatch Record keeping (the mill will be record all FFB received, CPO & PK dispatch regarding to real time basis).. Continuous improvement.
	Status: Comply
E.3.2	<p>The site shall have documented procedures for receiving and processing certified and non-certified FFBs.</p> <p>The company has showed the implementation procedure of FFB receiving and processing of certified or noncertified product. The document of FFB receive is delivery note, weight bridge card and sortation record. Each document should stamp as "Certified FFB", "Uncertified FFB" or "Certified and Uncertified FFB".</p> <p>Furthermore, the company has also set the data and coding of FFB in their computer system. Some of FFB supplier in mill as follows:</p> <p>Supplier outside of certification scope:</p> <ol style="list-style-type: none"> Arut Estate Division 1 (supplier code PT031) Arut Estate Division 2 (supplier code PT032) Sungai Kumai Estate (supplier code PT041) Plasma Lada 1 (supplier code PT050) Plasma Lada 2 (supplier code PT051) Plasma South (supplier code PT086) Plasma North (supplier code PT092) Plasma Arut (supplier code PT072) Plasma Sungai Kumai Estate (supplier code PT165) <p>Third party supplier</p> <ol style="list-style-type: none"> Iswanto (supplier code PT034) PT. Menthoi Makmur Lestari (supplier code PT042) TKD Runtu South (supplier code PT094)

4. Koperasi Tani Bahagia (supplier code PT063)
5. Koperasi Karya Tunggal (supplier code PT130)

Status: Comply

E.4 Purchasing and goods in

E.4.1

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

Based on interview with the mill manager and SCCS PIC, sighted that the company start claims RSPO product from January 2019. See on below table:

FFB

Month	Certified (MT)	Non Certified (MT)	Total (MT)
October 2018	-	29,419.35	29,419.35
November 2018	-	24,995.39	24,995.39
December 2018	-	22,549.09	22,549.09
January 2019	1,657.44	20,133.40	21,790.84
February 2019	1,264.03	19,227.23	20,491.26
March 2019	1,290.52	21,998.67	23,289.19
April 2019	1,106.28	21,732.01	22,838.29
May 2019	523.39	16,950.39	17,473.78
June 2019	1,309.79	28,575.72	29,885.51
July 2019	1,296.68	27,818.05	29,114.73
August 2019	1,147.49	24,358.78	25,506.27
September 2019	1,120.13	22,659.63	23,779.76
Total	10,715.75	280,417.71	291,133.46

Status: Comply

E.4.2

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

SOP Module E-CPO Mills: Mass Balance point 5.0 that the mill shall inform the CB immediately if there is a projected overproduction certified tonnage.

Status: Comply

E.5 Record keeping

E.5.1

- a. The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis.
- b. All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.
- c. The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three months. However, a site is allowed to sell short.(ie product can be sold before it is in stock.)

The site has record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a daily basis

FFB

Month	Certified (MT)	Non Certified (MT)	Total (MT)
October 2018	-	29,419.35	29,419.35
November 2018	-	24,995.39	24,995.39
December 2018	-	22,549.09	22,549.09

January 2019	1,657.44	20,133.40	21,790.84
February 2019	1,264.03	19,227.23	20,491.26
March 2019	1,290.52	21,998.67	23,289.19
April 2019	1,106.28	21,732.01	22,838.29
May 2019	523.39	16,950.39	17,473.78
June 2019	1,309.79	28,575.72	29,885.51
July 2019	1,296.68	27,818.05	29,114.73
August 2019	1,147.49	24,358.78	25,506.27
September 2019	1,120.13	22,659.63	23,779.76
Total	10,715.75	280,417.71	291,133.46

CPO

Month	Certified (MT)	Non Certified (MT)	Total (MT)
October 2018	-	6,729.62	6,729.62
November 2018	-	5,549.27	5,549.27
December 2018	-	5,071.91	5,071.91
January 2019	384.42	4,612.25	4,996.67
February 2019	288.58	4,345.52	4,634.10
March 2019	291.62	4,971.08	5,262.70
April 2019	244.52	4,803.34	5,047.86
May 2019	114.59	3,710.91	3,825.50
June 2019	276.25	6,026.95	6,303.20
July 2019	281.61	6,041.44	6,323.04
August 2019	262.96	5,582.09	5,845.05
September 2019	255.44	5,167.31	5,422.74
Total	2,399.99	62,611.69	65,011.66

PK

Month	Certified (MT)	Non Certified (MT)	Total (MT)
October 2018	-	1,233.12	1,233.12
November 2018	-	1,074.23	1,074.23
December 2018	-	857.17	857.17
January 2019	66.06	792.6	858.66
February 2019	51.99	782.95	834.95
March 2019	55.02	937.8	992.82
April 2019	47.31	929.41	976.73
May 2019	22.74	736.52	759.26
June 2019	55.62	1,213.46	1,269.08
July 2019	56.48	1,211.74	1,268.22
August 2019	53.43	1,134.14	1,187.57
September 2019	54.46	1,101.74	1,156.20
Total	463.12	12,004.88	12,732.78

Based on document verification and interview with the Lada POM Management sighted that they had been certified since dated 27 November 2018, however during last year there are no RSPO certified products claim sold. All of RSPO certified products were sold as conventional and remove on palm trace dated 8 October 2019.

Product	Transaction ID (removed)	Volume (MT)
CSPO	ST-TR-cf36f61f-469	2,145
CSPK	ST-TR-5e514179-9741	409

	Status: Comply
E.5.2	In cases where a mill outsources activities to an independent (not owned by the same organization) palm kernel crush, the crush still falls under the responsibility of the mill and does not need to be separately certified. The mill has to ensure that the crush is covered through a signed and enforceable agreement.
	Lada Mill does not have agreement with Kernel Crushing Plant (KCP). All kernel product sells directly to the buyer.
	Status: Comply

3.3 Conformity Checklist of Certificate and Trademark Use

1.	Evidence of permission or approval certificate and trademark from Certification Body which submitted by Client	X or√
ASA-1	PT Surya Sawit Sejati Subsidiary of United Plantations Bhd do not use RSPO trademark and CB Logo. United Plantations Bhd Trademark License Number RSPO-1-0004-04-100-00.	√
	Status: Comply	
2.	Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of trademark Use	X or√
ASA-1	PT Surya Sawit Sejati Subsidiary of United Plantations Bhd do not use RSPO trademark and CB Logo. United Plantations Bhd Trademark License Number RSPO-1-0004-04-100-00.	√
	Status: Comply	
3.	Implementation of Certificate and Trademark is not used on product	X or√
ASA-1	PT Surya Sawit Sejati Subsidiary of United Plantations Bhd do not use RSPO trademark and CB Logo. United Plantations Bhd Trademark License Number RSPO-1-0004-04-100-00.	√
	Status: Comply	
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.	X or√
ASA-1	PT Surya Sawit Sejati Subsidiary of United Plantations Bhd do not use RSPO trademark and CB Logo. United Plantations Bhd Trademark License Number RSPO-1-0004-04-100-00.	√
	Status: Comply	

3.4 Summary of RSPO Partial Certification.

Compliance of the uncertified management units of United Plantation Bhd. against the rules for partial certification was determined through external assessment conducted by RSPO Accredited Certification Body in accordance with RSPO Certification System clause 4.2.4. A summary of findings is as stated below.

United Plantation Bhd Time Bound Plan (TBP) is explained in point 1.10. United Plantation Bhd has informed the TBP progress, MUTU has considered that United Plantation Bhd is complied with the RSPO requirement for TBP. The Time Bound Plan was revised and declared by United Plantation Bhd on July 2016.

MUTU has verified partial certification for un-certified unit's subsidiary of United Plantation Bhd based on their Time Bound Plan. There is one (1) uncertified mills and four (4) uncertified estates of United Plantations Bhd. 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 no significant land conflicts which have not been declared above.
- The company has follow RSPO requirement related to New Planting Procedure and Remediation and Compensation Procedure.
- There is no labour disputes that is not being resolved through an agreed process.
- All plantations established since 2005 have been done so in accordance with the applicable laws of the country and that there is no evidence of non-compliance with law in any of the non-certified holdings which has not been declared above.

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p>Yes and positive assurance is produced for these units.</p> <p>Auditor verification</p> <p>There are external audit that has been conducted for all management units of:</p> <ul style="list-style-type: none"> - Lada POM – PT Surya Sawit Sejati - UIE POM - Jendarata POM - Ulu Bernam POM - Ulu Basir POM <p>And positive assurance is produced for these units.</p>
2.1.2	<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>United Plantation Bhd has submitted liability disclosure to RSPO.</p> <p>All three certification units of Ulu Bernam POM, Ulu Basir POM, Jendarata POM and UIE POM have no liability.</p> <p>For Lada POM:</p> <p>The company has identified HCV area for Lada Estate and Runtu Estate in 2008. However, the identification result is not considered sufficient by the company since there is no information on the hectare of HCV area and the location of the identified HCV. Therefore, the company re-</p>

		<p>identify the HCV area and delineate the HCV area based on HCV identification 2006. The delineation is conducted by Biodiversity Team of the company. Based on the delineation of HCV area there is HCV area that is opened by the company. The company has sent the disclosure of liability and currently has entered to the third stage of RACP process.</p> <p>In 2014, the company has also conducted HCV identification for smallholder scheme area and Kumai Arut Conservation Area for the area of 1,121.2 ha. However, the area of 49.572 ha is highly potential be opened as housing area of Benaning Bawah Villagers. The information is based on community aspiration to exclude the area from HCV area of Kumai Arut Estate Scheme Smallholder. The company with assigned consultant has approached and counselled local community through FPIC method. The company has consulted to RSPO Jakarta Office on 9 May 2016 in accordance with this situation for RSPO to accommodate community aspiration without disobey RSPO requirement on new area development. This communication shall be followed up and updated</p> <p>Auditor verification Auditor has verified the supporting evidence of above the company statement. The above statement in accordance with the supporting evidence provided.</p>
2.1.3	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>No new planting/land clearing after 1st January 2010</p> <p>Auditor verification United Plantation Bhd has sent their LUCA and process their RACP liability. There is no liability applied for units in Malaysia.</p> <p>However, there is liability applied for Lada POM – PT Surya Sawit Sejati, certification unit is located in Central Kalimantan, Indonesia. The company has showed evidence on RACP process for the unit. At current, the compensation process has been sent to RSPO Secretariat but no approval yet.</p>
2.1.4	Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	<p>There is no land conflicts.</p> <p>Auditor verification The SEIA document of the company has identified legal, customary and user right that is</p>

		<p>presented in the information of the surrounding community. The company has also the SOP to identify legal, customary and user rights that is provided in SOP Land Compensation No. HRD-015-R00 dated 1 January 2016. The community is involved in identifying the land claimed and in the compensation process including the amount of the compensation is negotiated. The company also provides mechanism that has been socialized to the surrounding the community through three monthly meeting between the company and the community. Further, the record of any claim and the compensation process is filed by the company. The record of the compensation process is provided to the claimant and can be access through stakeholder information request regulated in procedure of information request by internal and external party No. SOP-HRD-05-R00.</p> <p>Based on public consultation with the surrounding community, they has understood the mechanism if there is a claim and the PIC of the company to be contacted. They also inform that the claimant has been informed first on the compensation amount offered by the company but they still can negotiated and can say no to refuse the offered compensation if they did not agree. The final result of the negotiation on compensation process is informed to them.</p>
2.1.5	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	<p>There is no labor disputes.</p> <p>Auditor verification</p> <p>There is no information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries.</p> <p>The company has a complaint and grievance mechanism regulated in stakeholder communication and consultation (SOP-HRD-07-R00) and land conflict procedure (SOP : SSS-COMDEV(HMS)-024). The mechanism regulated the flow chart process. It is equipped with complaint form</p> <p>The procedure has been socialized to employee in morning briefing and SOP day. And the socialization to the surrounding community is given through three monthly meeting. The documentation of incoming complaint and grievance is documented by the company including the response by the company. The documentation of the complaint process is documented and the response is informed to the</p>

		complainant. This documentation is managed by Human Resource Department. It can be accessed by stakeholder through information request mechanism.
2.1.6	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	<p>Yes, there is process for land legality.</p> <p>Auditor verification PT Surya Sawit Sejati SSS have complete list of legal requirement that related to RSPO P&C. The copy of the document available in the office during the assessment conducted and sighted by the auditor.</p> <p>Personnel in charge to manage the legal documentation system are Legal Department.</p> <p>A system used for tracking any changes in laws and regulations was set-up through procedure No: SOP-HRD-017-R00. SSS has conducted internal audit for legal compliance and explained the process for evaluate the compliance of regulation.</p>

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

NCR No.	: 2017.1	Issued by	: Andi Pratama Pasaribu
Date Issued	: 14 December 2017	Time Limit	: Before certificate issued
NC Grade	: Major	Date of Closing	: 20 February 2018
Standard Ref. & Requirement	6.3.1 The mechanism, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested, as long as that information is supported with adequate initial evidence.		
Non-Conformance Description & Evidence observed <i>(filled by auditor):</i> The company already has a policy to protect the whistle blower that approved by President Director on December 13, 2017. However, there is not enough evidence that the policy has been socialized to all levels of employees including the reporting mechanisms provided.			
Root Cause Analysis <i>(filled by organization audited):</i> The Whistleblower Policy which endorsed on 1 st April 2017 has been cascaded to all level of workforce as well as external stakeholders periodically as per annual training programme. However, the policy has been revised on 13 th December 2017 to include the anonymity of complainants. Management have not conduct training/socialization on the revised clause in policy i.e The complainants can choose not to disclose their identity and management will assure their anonymity. Please refer to the Appendix A on the revised Whistleblower Policy.			
Corrective Action <i>(filled by organization audited):</i> Management have conducted training/socialization to all level of workforce as well as external stakeholders on the revised Whistleblower Policy. All of the internal and external stakeholders were briefed on the revised policy especially on the clause where the complainants can choose not to disclose their identity and management will assure their anonymity. Please refer to the Appendix B on the training records (list of attendances and photos).			
Preventive Action <i>(filled by organization audited):</i> Management have developed Standard Operating Procedure (SOP) on mechanism of handling issue raised by whistleblowers. Furthermore, whistleblowers can lodge complaints via email or hotline and management will attend to the matter within 30 days. Please refer to the Appendix C on the mechanism to lodge complaints for whistleblowers.			
Assessor Evaluation and Conclusion <i>(filled by auditor):</i> The company has shown corrective evidence as follows: 1. Whistleblower policy.			

2. Standard operational procedure of violation reporting mechanism. The procedure has set the way to reporting violation through via phone, email, short message etc.
3. Minutes of meeting socialization whistleblower policy to all level of employee.

Based on the evidence above, this non conformity is has been fulfilled.

Verified by : **Andi Pratama Pasaribu**

NCR No.	:	2017.2	Issued by	:	Brigitta Prita
Date Issued	:	14 December 2017	Time Limit	:	12 month
NC Grade	:	Major	Date of Closing	:	10 October 2019
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 <i>(filled by auditor):</i> There is no evidence that the new planting development after November 2005 did not open primary forest and HCV. Based on the document review it is known that the company opened a new plantings on November 2005, the Company has shown LUC Analysis verification result document for PT SSS as much as 5 unit management. HCV assessment on May 9, 2014 with a total area of 18,743.74 ha of management unit, total area of raw liability of 10,699.5 ha and total conservation liability area of 2,508.76 ha. The analysis method for LUCA is image analysis and EIA was done by Green Harvest Environmental sdn bhd. (Kumai Estate, Lada Estate and Runtu Estate). In addition, there is a letter from RSPO Compensation dated October 17, 2017 to PT SSS stating the compensation panel has deliberated. Then available replies from RSPO dated November 9, 2017 stating "Since PT Surya Sawit Sejati is still undergoing the RACP process, their concept has been submitted to the Compensation Panel for review. Only after the approval, the grower can proceed with developing the full compensation plan ". Furthermore there is an email reply back from RSPO dated November 10, 2017 stating that the company is given 1 year to close the non-conformity ("since the closing for the NC is 1 year not 3 months).					
Root Cause Analysis <i>(filled by organization audited):</i> The HCV Concept Note has been approved by RSPO Compensation Panel on 26 th February 2018 and subsequently Annex 8 (HCV RaCP and budget plan) has been submitted on 4 th May 2018. The evaluator appointed by RSPO Secretariat have reviewed and provided comments on Annex 8 and budget plan on 5 th September 2018 however the outcome was unsatisfactory. Subsequently we have submitted all supporting evidences further to the queries from evaluator on 5 th April 2019 and again, the outcome of evaluation remains unsatisfactory. As the evaluator is not familiar with AMDAL and RKL/RPL (social remediation aspect) and there was some misunderstanding in the concept of our proposed project, there was some delay in the review process by the evaluator.					
Corrective Action <i>(filled by organization audited):</i> A meeting was held between Head of Certification, RSPO Biodiversity Manager and our team to deliberate on the progress which was being made on HCV Compensation for PTSSS on 13 th November 2018 and the conditional approval to extend the NC closure was granted and proceed with the issuance of RSPO certificate for PTSSS in November 2018. We maintained active engagement with the RSPO Biodiversity Manager, Ms. Su Li to revise the					

Annex 8 in accordance to the checklist and information requested by the evaluator. We have provided detailed clarification and supporting documents to clarify the uncertainty on remediation plan as well as the proposed project however the evaluator refused to accept the RaCP. Many physical meetings and conference calls were held during the deliberation process. The final revised Annex 8 and supporting documents were presented to the RSPO HCV Compensation Panel on 27th September 2019 and the approval was granted on 4th October 2019. For more information, please refer to Attachment 1 on the chronology of our RaCP.

Preventive Action *(filled by organization audited):*

The key root cause of RaCP approval being delayed solely due to the external evaluator who is not familiar with the remediation works on the ground and background of the proposed project (mainly on meta-population of RTE species). In order to avoid further delay, the RSPO Biodiversity Manager has presented our revised Annex 8 along with the detailed clarification and supporting evidences collated by us to the RSPO HCV Compensation Panel and finally the approval was granted.

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

Verifikasi, 8 Oktober 2019.

Tersedia email dari khing sulis (khing.sulis@rspo.org) tanggal 4 Oktober 2019 yang menginformasikan bahwa “*I would like to inform you that the Compensation Panel has reviewed the clarification provided by your good self and Dr Carl Traeholt, and I am pleased to convey that the Compensation Plan is approved by the Compensation Panel, but with follow up action points*”.

Perusahaan telah menunjukkan dokumen pendukung untuk hal-hal diatas:

1. Annex 7 Compensation Concept Note on Population Management of the endangered species.
Following the RSPO regulation and guidance, UP/PTSSS submitted a self-declaration liability and the final conservation liability amounted to an area measuring 2508.76ha.
According to the RSPO compensation guidelines, compensation can be meted out in various ways, amongst these;
 - Area based compensation in Indonesia@ buy land and maintain for ≥25years
 - Monetary equivalent compensation to external conservation organisation
 - Internal conservation actions that meets the “additionality” criteria
2. Annex 8 Compensation Plan
 - Lada Estate.
 - Rehab Riparian (remediation) 74.46 ha.
 - Rehab Floodplain 50.8 ha.
 - Non-oil Palm Plantings on steep slope.
 - Rantau
 - Rehab Riparian (remediation) 15.59 ha.
 - Rehab Floodplain (Freshwater swamp 133.2 ha dan peat swamp 205.3 ha).
 - No oil palm plantings on steep slope.
3. 25 years budget and timeline
4. Clarification needed for compensation plan final on 27 September 2019.

Berdasarkan penjelasan diatas, ketidaksesuaian ini dinyatakan telah terpenuhi.

Verified by	:	Brigitta Prita
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3.5.2. Identification of Findings, Corrective Actions and Observations at ASA-1

NCR No.	: 2019.01	Issued by	: Satria Adi Putra
Date Issued	: 11 October 2019	Time Limit	: ASA-2
NC Grade	: Minor	Date of Closing	:
Standard Ref. & Requirement	4.1.2 Examination or monitoring activities are carried out according to operating procedures at least once a year.		
Evidence observed (filled by auditor): Based on the document review, it was found that there was a collaboration between PT SSS and several contractors including CV Bahri, CV Guntur, Bumdes Karya Mandala Makmur, CV Muara Mas Berkah Sejahtera, CV Aufa Nur Jaya, CV Ragika, CV Sungai Rangit Jaya, etc.			
Non-Conformance Description (filled by auditor): The company has not been able to show that inspection or monitoring activities are available to all contractors / third parties, for example evaluating PPE fulfillment, health insurance, fulfilling contractor employee salaries and so on.			
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	: Haikal Ramadhan Kharismansyah
Date Issued	: 11 October 2019	Time Limit	: 10 January 2020
NC Grade	: Major	Date of Closing	: December 17, 2019
Standard Ref. & Requirement	4.7.1 A health and safety policy shall be in place. A health and safety plan shall be documented and implemented, and its effectiveness monitored.		
Evidence observed (filled by auditor) : <ul style="list-style-type: none"> Based on field observation to the Lada 2 housing and Lada 1 PPE storage warehouse, the following facts were found: <ul style="list-style-type: none"> Lada 2 Housing: <ul style="list-style-type: none"> There is 1 Apron stored at the worker's home (The results of interviews with workers are known interviewee is pesticide and fertilizer applicator) There is 1 set of PPE fertilizer applicator in 1 other house Lada 1 PPE Storage Warehouse : <ul style="list-style-type: none"> Based on the daily work plan at the time of the field observation there is no spray and manuring activities Information from the person in charge of the warehouse total pesticide and fertilizer applicator is 16 people PPE available and stored in the warehouse are 11 pieces of rubber gloves; 13 masks; Apron 15 pieces; Jerrycans fertilizer 4; Fertilizer Bowl 0; and 17 Knapsack sprayers 			

- Based on the list of Lada Estate employees, it is known that the number of Lada 1 spraying workers is 11 people. Whereas for fertilizers applicator as stated by the person in charge of the warehouse are 8 people
- PPE and work equipment are still found, especially for work related to agrochemical stored not in the place provided
- Procedure No. SOP SSS-EST-03 concerning Maintenance of immature / mature Oil palm dated 12/10/2007 in section 3.1.4 J states that all equipment, chemicals, PPE and containers must be returned to the warehouse after use

Non-Conformance Description (filled by auditor):

The company has not been able to show consistency in implementing the planned occupational health and safety plan.

Root Cause Analysis (filled by organization audited):

The SOP and HIRARC on safe use and handling of chemical are available however there is no specific SOP on handling and storage of used PPEs which explicitly mention about the procedure and assign of dedicated person to ensure all PPEs are washed and kept in store after work.

Correction (filled by organization audited):

1. The Estate Management has assigned a dedicated person in-charge of PPE washing in the chemical store after working hours. Further to the discussion between the Estate Management and the selected workers, the workers have accepted the task and will ensure all PPEs are return to store after work. (Name of worker: Refer to Appendix 2A)
2. Standard Operating Procedure and monitoring checklist on the proper storage of PPE and tools have been developed (Please refer to Appendix 2B).
3. Training on SOP and monitoring checklist on the proper storage of PPEs and tools has been conducted on 26 November 2019 in Lada Estate and 5 December 2019 in Runtu Estate (Please refer to Appendix 2C).

Corrective Action (filled by organization audited):

1. Weekly linesite inspection to be conducted by Hospital Assistant/Mantri to check on any used PPEs or tools being brought back home by the workers. The current checklist has been revised to include this element (Please refer to Appendix 2D).
2. The Sustainability Team will conduct internal audits annually to ensure the checklist are adhered to and the practice is being monitored on the ground.

Assessor Evaluation and Conclusion (filled by auditor):

Verification on December 17, 2019

The company has shown evidence of improvements in the form of:

1. List of persons responsible for storing and cleaning PPE Employees of Spraying and Manuring for Lada Estate Division 1, Lada Estate Divisi2, Runtu Estate North Division, and Runtu Estate South Division
2. SOP of Personal Protective Equipment Storage and Work Equipment (SSS-ESH-02) dated November 6, 2019, signed by the president director. The APD monitoring checklist format has been attached.
3. Documentation of training and socialization of PPE Storage SOP for spraying dand manuring employee for all estates.
4. nternal Memorandum dated October 30, 2019 from Assistant Sustainability Manager to Hospital Assistant regarding changes to the linesite inspection format, which at the weekly inspection of the employee housing complex also checks whether the PPE of the manuring and spraying team is being brought home.
5. PPE's and working tools places procedure to the 17 spraying and manuring workers dated 26 November 2019 in Lada Estate.

6. PPE's and working tools places procedure to the 20 spraying and manuring workers dated 5 December 2019 in Runtu North Estate.
7. PPE's and working tools places procedure to the 11 spraying and manuring workers dated 5 December 2019 in Runtu North Estate.

Auditor conclusion:

Based on above explanataions, this nonconformities has been closed.

Verified by : **Haikal Ramadhan Kharismansyah & Trismadi N**

NCR No.	: 2019.03	Issued by	: Haikal Ramadhan Kharismansyah
Date Issued	: 11 October 2019	Time Limit	: 10 January 2020
NC Grade	: Major	Date of Closing	: December 17,2019
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.		

Evidence observed (filled by auditor) :

- Information from field visits and interviews with operators at the Engine Room station known they had never attended OSH training for power and production plane.
- Permenaker No 38 year 2016 concerning OHS for power and production plane stated
 - Article 110: Operation of Power and Production Plane is carried out by OHS operators
 - Article 111: OHS operators include first movers, machine tool and production operators; furnace operator
 - Article 113: First movers operators include combustion motor operators, steam turbines, water turbines, gas turbines and windmills.

Non-Conformance Description (filled by auditor):

The company has not been able to show the recording of occupational safety and health (OHS) training programs for Power and Production Plane Personnel operators as stipulated in Permenaker No. 38 of 2016. Non-conformity No.2019.03.

Root Cause Analysis (filled by organization audited):

The mill management was uncertain on whether occupational safety and health certification is mandatory for the initial movers, machine tool and production operators and furnace operators.

Correction (filled by organization audited):

1. An official letter has been sent to the Labour Department to seek confirmation on occupational safety and health certification obligations for initial movers, machine tool and production operators and furnace operators. The Labour Department has responded and provide clarification on the above matters. (Please refer to Appendix 3A).
2. The mill management has immediately registered the operators for OSH training by the accredited training provider. The operators have attended the training on 14th October 2019 and the certificates are attached as per Appendix 3B.

Corrective Action (filled by organization audited):

1. To identify all other operators who is currently assisting the operation as back-up person but performing the task and develop a training programme as all operators shall possess the certificate at all time. (Please refer to Appendix

3C).

2. The management have included the OSH licenses for the mill operators in the summary of permits/license. (Please refer to Appendix 3D). In the event of any main operators with OSH licenses have resigned or being transferred to other stations, the back-up operators with OSH license will replace the position with immediate effect.

3. To identify all other operators who is currently assisting the operation as back-up person but performing the task and develop a training programme as all operators shall possess the certificate at all time.

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

Verification on December 14, 2019

The company shows evidence of improvement in the form :

1. Letter No. 402 / HRD / EKS / UP-SSS / X / 2019 dated October 14, 2019 concerning confirmation of the implementation of Permenaker No38 of 2016
2. Letter of response No. 566/332 / X / Disnakertrans / 2019 dated October 21, 2019 from the Head of UPT Pangkalan Bun Manpower Supervision Office which states that the intended operator is the motor fuel starter or the same as the generator operator
3. There was an application for operator training on October 11, 2019 for 2 PT SSS operators (NIK 056/131011 and NIK 058/011011 from Mill Manager to HR Manager
4. Certificate of training of first-class movers operators by Synergy Solutions (14-17 October 2019)
5. In House Training on 30 and 31 October 2019 for 12 PT SSS generator set operators
6. Statement from the Directorate General of Labor and Supervision and OHS for 2 PT SSS operators (NIK 056/131011 and NIK 058/011011) dated 18 November 2019 which explained that both of them had fulfilled the requirements as OHS Diesel Motor Class 1 operator
7. Summary Permit list of PT Surya Sawit Sejati

Auditor Conclusion:

Based on above explanation, this non conformities has been closed.

Verified by : **Haikal Ramadhan Kharismansyah & Trismadi N**

<i>NCR No.</i>	:	2019.04	<i>Issued by</i>	:	Haikal Ramadhan Kharismansyah
<i>Date Issued</i>	:	11 October 2019	<i>Time Limit</i>	:	10 January 2020
<i>NC Grade</i>	:	Major	<i>Date of Closing</i>	:	December 14, 2019
<i>Standard Ref. & Requirement</i>	:	6.5.1 Documentation of pay and conditions for employees based on the existing manpower regulations shall be available.			
Evidence observed (filled by auditor) : <ul style="list-style-type: none">As a basic wage companies use <i>UMSP</i><ul style="list-style-type: none">In accordance with the Decree of the Governor of Central Kalimantan No. 51 of 2018 dated 21 November 2018, the Regency / City Sectoral Minimum Wage in the province of Central Kalimantan as of January 1, 2019 is 2,965,514.00 idrGovernment Regulation No.78 of 2015 concerning Wages includes stating: Article 13 states that in the case wages are set daily for companies with a work system of 6 days a week wages a month divided by 25 (twenty-five); Article 15 states that wages based on unit yields are determined in accordance with agreed work results Article 41 states that the lowest monthly wages consist of wages without benefits or basic wages with fixed					

<p>allowances;</p> <ul style="list-style-type: none"> - Article 35 states that in the case of workers' wages paid on the basis of a piece / piece or commission, the daily income is the same as the average daily income for the last 12 months provided that it cannot be less than the minimum wage requirement - The current minimum daily wage as explained by the accompanying officer is UMSP / Number of dates per month • Based on the September 2019 salary slip found the following information: <ul style="list-style-type: none"> - The number of days in September is 30 - Daily wage for <i>KHT</i> is 2,965,514.00 idr - / 30 days = 98,850.5 idr <p>Sampling of employee salary slip RH01729 for September 2019 (Harvesters); The working starting date is September 09. From September 9 to September 30 there are 22 Calendar Days Absent 3 Days Daily salary / 10 day salary = 988,505 idr Pruning payment = 525 oil palm tree 3,432 idr <i>Buffalo Harvesting</i> → 9 days; Tonage 9.659 Ton; 434,655idr. So Wages Per day when using wages with a yield unit is 45,000.00 idr The total daily work income plus a piece of work is 1,426,592 idr The wage that should be paid within 19 working days is 1,878,158.867 Idr</p> <ul style="list-style-type: none"> • Lada POM employee trainee wage payment slips: ED133 Basic salary 2.965.514 idr Wage deduction : Absent (1 day) Rp 98.850 + JHT 59,310 + BPJS Kesehatan 28,085 + BPJS Pensiun Wages received 2,750,000.00 idr (2,965,515 idr - 98,850 idr - 59,310 idr - 28,085 idr) Even though in that period the workers worked full time (25 days work + 5 Sundays Sundays are considered working day because it uses divider 30 for daily wage). There are deductions due to national holidays on Sundays so the system cuts the wages of workers • Wages paid are not in accordance with regulation <p>Non-Conformance Description (filled by auditor): The remuneration system shown by the company is not in accordance with applicable labor regulations, for example PP No. 78 of 2015 concerning wages.</p>
<p>Root Cause Analysis (filled by organization audited):</p> <ol style="list-style-type: none"> 1. Buffalo collection system is a newly implemented system in PTSSS. The productivity is not at full scale and optimum. The productivity target for the buffalo operators are too high and minimum wage could not be achieved by the operators. 2. The checkroll system, Pinfosys system does not recognise the payment method for restday on a public holiday for a trainee worker in the mill management. There are two type of payment method in the Pinfosys system (Pinfosys Monthly Rate & Pinfosys Daily Rate).
<p>Correction (filled by organization audited):</p> <ol style="list-style-type: none"> 1. The basis for all types of harvesting work has been determined and endorsed by the President Director of PTSSS (Please refer to Appendix 4A). 2. The socialization on the harvesting work basis to all harvesting workers (Please refer to Appendix 4B). 3. The shortfall of wages for harvesting workers has been paid by the estate management on 7 October 2019 (Please refer to Appendix 4C). 4. The shortfall of wages for mill trainees has been paid by the mill management on 12 October 2019 (Please refer to Appendix 4D).

Corrective Action *(filled by organization audited):*

1. The payment mechanism for buffalo harvesting has been revised to meet the reasonable productivity target. (Please refer to Appendix 4E).
2. The wage calculation for temporary/trainee has been standardized and endorsed by the President Director of PTSSS (Daily/Monthly). (Please refer to Appendix 4F).
3. The HR team to carry out internal audits along with RSPO/ISPO audit to check on wages and all statutory payment for both contractors and checkroll workers.
4. Warning letter to be issued to harvesters/ general workers who unable to get the minimum wages for the month due to poor productivity. Briefing will be conducted on the particular workers to improve productivity however no such cases as of todate

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

Verification On December 14, 2019

The company provides evidence of improvements consisting of:

1. Letter from the president director on October 29 about the basis system for the buffalo system. In the letter also mentioned during the low crop, the FFB base is converted to an area base of 2.5ha / HK. Management will monitor the productivity of harvesters
2. Letter from the president director dated December 2, 2019 regarding employee wages which in essence refers to the 2015 minimum wage and PP 78
3. Socialization of harvest bases to harvesters for all estates on November 1, 2019 at morning briefing
4. Payback receipt (Top Up Payment) July - September 2019 for harvesters who do not reach the base and are subject to wage deductions
5. Payback slip mill tarinee for September 2019. Shortage of 1 HK has been paid

Based on the analysis of the root causes, corrections, and corrective actions the nonconformity are stated to have been closed

Verified by : **Haikal Ramadhan Kharismasnyah**

3.5.3. Opportunity for Improvement

No	Ref. Std.	Description
1	-	-



3.5.4. Noteworthy Positive Components

No	Description
1	Has obtained a domestic waste permit in 2019 by the Regent of Kotawaringin Barat.
2	Already have a Biogas Plant.
3	Has obtained an ISPO certificate.
4	Housekeeping is excellent.
5	Perform domestic waste management with system 3R (Reduce, Reuse, and Recycle).
6	Doing the planting of 16.330 trees forest for 2018.
7	The award of the Regent Kotawaringin West on the role and cooperation in road construction activity through a consortium of companies in the District of Pangkalan Banteng - Kumai in December 2018.
8	The award of the Regent Kotawaringin West as the largest payer of Tax most BPHTB 2018 in January 2019.

3.6 Summary of Arising Issues from Public and Auditor Verification

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Secretary and Head of Runtu Village, and also Headmaster of elementary school 2 Runtu.</p> <ul style="list-style-type: none"> • The company has conducted socialization before conducting operational activities. • The company has a good relationship with the surrounding village community both institutionally and personally. • There are still unresolved land issue issues. However, it tends to be only one-sided dispute and claimant who can not prove their ownership documents. The Company also involves representatives or community leaders in the process of settling disputes and / or land acquisitions. • The company has conducted stakeholders meeting involved communities, government, and others in year of 2019. • Companies contribute to local development through CSR programs. For example for the infrastructure sector (repair and maintenance of roads / bridges), education assistance and so forth. • The company also improves community welfare with smallholder scheme programs and provides employment and business opportunities. • There is no environment pollution issues during last year. • There is no fire case issues during last year. • The company has realized CSR on the education sector, such as: uniform, stationery, and scholarship during last year. 	<p>Its refer to criterion 2.2, 2.3 and 6.1.</p>
<p>Head of Sungai Rangit Jaya Village and three previous land owners and smallholder member.</p> <ul style="list-style-type: none"> • The company has a good relationship with the surrounding village community both institutionally and personally. • There are still unresolved land issue issues. However, it tends to be only one-sided dispute and claimant who can not prove their ownership documents. The Company also involves representatives or community leaders in the process of settling disputes and / or land acquisitions. • Companies contribute to local development through CSR programs. For example for the infrastructure sector (repair and maintenance of roads / bridges), education assistance and so forth. • The company also improves community welfare with smallholder scheme programs and provides employment and business opportunities. 	<p>Its refer to criterion 2.2, 2.3 and 6.1.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> • The company has socialized about deduction of the smallholders payment, and it can be accessed by the smallholders board or members. • There is no environment pollution issues during last year. • There is no fire case issues during last year. • Land acquisition with FPIC process, there are no intimidation to the previous land owners. 	
OHS Supervisor of West Kotawaringin Regency <ul style="list-style-type: none"> • P2K3 routine reporting is in accordance with the timeframe • P2K3 structure has been approved. • Already have an SLO from the Ministry of Energy and Mineral Resources. • Routine inspection of the feasibility and permit of factory machinery has been carried out. • Has included employees in the BPJS program. 	<p>Has been verified in indicator 4.7.3; 4.7.4, 4.7.5; and 4.7.6.</p>
National Land Agency <ul style="list-style-type: none"> • There is no new location permit. • No information plantings outside the concession. • Company has not yet report the Land use report to National Land Agency. • There are management of HGU as many as 10 land lot and progress is currently awaiting a decision letter from the land Agency. • The company has a 20 percent of plasma • The agency was encourage to making boundaries according to regulations 	<ul style="list-style-type: none"> • The company has had Land Use Permit as required. • Has been verified by the auditor, Land use report contained in the LKUP report and has been delivered to the national Land Agency.

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY
4.1	<p>Formal Sign-off of Assessment Findings</p> <p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;"> <p>PT Surya Sawit Sejati Management Representative</p>  <p><u>C.Mathews</u> Tuesday, 17 December 2019</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><u>Trismadi Nurbayuto</u> Tuesday, 17 December 2019</p> </div> </div>

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

No	Institution/NGO/Community	Address	Phone/Email	Form of Communication	Date of Contact	Response	
						Yes	No
1	Wages and Worker Insurance, Manpower and Transmigration Agency of Kotawaringin Barat District	District of Kotawaringin Barat	-	Interview	October 7 th 2019.	√	-
2	OHS Inspector Regional III, Manpower and Transmigration of Central Kalimantan Province	District of Kotawaringin Barat	-	Interview	October 7 th 2019.	√	-
3	Environment Agency of Kotawaringin Barat Regency	District of Kotawaringin Barat	-	Interview	October 7 th 2019.	√	-
4	Plantation Agency of West Kotawaringin	District of Kotawaringin Barat	-	Interview	October 7 th 2019.	√	-
5	Local Contractor CPO & Kernel (CV Sungai Bahri & Sungai Rangit)	Village of Sungai Rangit Jaya Sub-district Pangkalan Lada District of Kotawaringin Barat	-	Interview	October 8 th 2019.	√	-
6	Gender Committee	Village of Sungai Rangit Jaya Sub-district Pangkalan Lada District of Kotawaringin Barat	-	Interview	October 8 th 2019.	√	-
7	Labour Union	Village of Sungai Rangit Jaya Sub-district Pangkalan Lada District of Kotawaringin Barat	-	Interview	October 8 th 2019.	√	-
8	Wahana Lingkungan Hidup Indonesia	-	-	Questioner	September 24 th , 2019	-	√
9	Aliansi Masyarakat Adat Nusantara	-	-	Questioner	September 24 th , 2019	-	√
10	Sawit Watch Indonesia	-	-	Questioner	September 24 th , 2019	-	√
11	Internal stakeholders: Lada Estate - 5 persons – Pesticide applicators - 5 persons – Fertilizer applicators - 1 person – EFB applicator - 3 persons - Harvesting Worker Lada POM - 2 persons – welder operator - 1 person – WTP operator	Pangkalan Lada District of Kotawaringin Barat	-	Interview	October 08-10 th 2019.	√	-

Appendix 2. Assessment Program

DATE	7 to 11 October 2019	
PLANNED TIM	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 7 October 2019		
06.10 – 08.00 09.00 – 12.00 09.00 – 12.00	Travelling from Jakarta to Pangkalan Bun (Nam Air IN 190) <ul style="list-style-type: none"> Public consultation to Government Agency. Public consultation to surrounding communities (Previous Land Owners, Public Figure, Village Head on Runtu Village & Sungai Rangit Jaya Village) 	<ul style="list-style-type: none"> All Auditor Team HRK/BRP/SAP TNB
12.00 – 14.00	Break	<ul style="list-style-type: none"> All Auditor Team
14.00 – 15.00	Opening Meeting: <ul style="list-style-type: none"> Auditee Speech (Introduction of PIC, Profile of Mill and Estates Management Unit). Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Determine of Field Visit Audit, Transparency and Confidentiality Clarification). 	<ul style="list-style-type: none"> All Auditor Team
15.00 -17.00	<ul style="list-style-type: none"> Review of Previous Visit Non-conformance (ST-2 RSPO & ISPO), Partial Certification & Time Bound Plan verification Document Verification: Basic Information 	<ul style="list-style-type: none"> All Auditor Team
Tuesday, 8 October 2019		
08.00 – 12.00	Field Observation at Lada Estate: <ul style="list-style-type: none"> Activities of Harvesting & Transportation, Fertilize, Pesticides Application, Road Maintenance and Biological Control Monitoring Landfill, Fire Control Facilities (simulation), Chemical Storage, Fertilizer Storage, Hazardous Waste Storage and workshop Housing, School, Worship Place, Clinic, generator room and Reservoir Land Use, Legal Boundaries, HCV/ conservation area Interview with Gender Committee, Worker Union, Worker Cooperative, & Local Contractors 	<ul style="list-style-type: none"> SAP HRK HRK TNB BRP
12.00 – 14.00	Break	<ul style="list-style-type: none"> All Auditor Team
14.00 – 17.00	Document Verification: <ul style="list-style-type: none"> Basic Information (clarification) Legal Demarcation Aspect (Inspection of Legal Boundary Stones, Community Buffer Area/Enclave) SCCS Agronomy (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Occupational Health & Safety Aspect (PPE Used in Harvest, Manure & Pesticide Application) and Worker Welfare. Worker's Facilities Aspect (Housing, Daycare, Sports Facilities, Employees Meeting Hall, Sanitary Facilities) & Fire Control Facilities, Waste Management) Environmental/Conservation Aspect (Inspection of HCV Identified Area, Riparian/Waterways Zone, Reservoir, Forest Area, Peat Area (Water management, etc), Chemical Storage, Fertilizer Storage, Hazardous Waste Storage. 	<ul style="list-style-type: none"> All Auditor Team

DATE	7 to 11 October 2019	
PLANNED TIM	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Wednesday, 9 October 2019		
08.00 - 12.00	Field Observation at Runtu Estate: <ul style="list-style-type: none"> • Activities of Harvesting & Transportation, Fertilize, Pesticides Application, Road Maintenance, Biological Control Monitoring • Waste management, Fire Control Facilities (simulation), Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, workshop • Housing, School, Worship Place, Clinic, generator room, Reservoir • Land Use, Legal Boundaries, HCV/ conservation area 	<ul style="list-style-type: none"> • SAP • BRP • BRP • TNB/HRK
12.00 -14.00	Break.	<ul style="list-style-type: none"> • All Auditor Team
14.00 -17.00	Document Verification: <ul style="list-style-type: none"> - Basic Information (clarification) - Legal Demarcation Aspect (Inspection of Legal Boundary Stones, Community Buffer Area/Enclave) - SCCS - Agronomy (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) - Occupational Health & Safety Aspect (PPE Used in Harvest, Manure & Pesticide Application) and Worker Welfare. - Worker's Facilities Aspect (Housing, Daycare, Sports Facilities, Employees Meeting Hall, Sanitary Facilities) & Fire Control Facilities, Waste Management) - Environmental/Conservation Aspect (Inspection of HCV Identified Area, Riparian/Waterways Zone, Reservoir, Forest Area, Peat Area (Water management, etc), Chemical Storage, Fertilizer Storage, Hazardous Waste Storage. 	<ul style="list-style-type: none"> • All Auditor Team
Thursday, 10 October 2019		
08.00-12.00	Document Verification: <ul style="list-style-type: none"> - Basic Information (clarification) - Legal Demarcation Aspect (Inspection of Legal Boundary Stones, Community Buffer Area/Enclave) - SCCS - Agronomy (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) - Occupational Health & Safety Aspect (PPE Used in Harvest, Manure & Pesticide Application) and Worker Welfare. - Worker's Facilities Aspect (Housing, Daycare, Sports Facilities, Employees Meeting Hall, Sanitary Facilities) & Fire Control Facilities, Waste Management) - Environmental/Conservation Aspect (Inspection of HCV Identified Area, Riparian/Waterways Zone, Reservoir, Forest Area, Peat Area (Water management, etc), Chemical Storage, Fertilizer Storage, Hazardous Waste Storage. 	<ul style="list-style-type: none"> • All Auditor Team
12.00 -14.00	Break.	<ul style="list-style-type: none"> • All Auditor Team
14.00 -17.00	Field Observation to Lada POM: <ul style="list-style-type: none"> • Security post, WB, Storage Tank, Kernel Bulk, Laboratory • Processing station, engine room, boiler, workshop, Hydrant simulation 	<ul style="list-style-type: none"> • TNB • SAP • HRK

DATE	7 to 11 October 2019	
PLANNED TIM	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
	<ul style="list-style-type: none"> • Drainage, Workshop, WTP, Hazardous Waste Store, Chemical Store, Clean Water, etc • Water Intake, Effluent Ponds, Housing. 	<ul style="list-style-type: none"> • BRP
Friday, 11 October 2019		
08.00 – 09.00	Interim meeting	<ul style="list-style-type: none"> • All Auditor Team
09.00 – 11.00	Closing Meeting	<ul style="list-style-type: none"> • All Auditor Team
Saturday, 12 October 2019		
07.35 – 09.00	Travelling from Pangkalan Bun to Jakarta (Trigana Air)	<ul style="list-style-type: none"> • All Auditor Team