

*Roundtable on Sustainable Palm Oil Certification  
RSPO*

**[ ✓ ] Surveillance**

Name of Management Organisation : Manggala Palm Oil Mill - PT Tunggal Mitra Plantation subsidiary of Sime Darby Plantation Bhd.  
 Plantation Name : Manggala 1 Estate, Manggala 2 Estate and Manggala 3 Estate  
 Location : Pujud Village, Pujud Sub-District, Rokan Hilir District, Riau Province, Indonesia  
 Certificate Code : **MUTU-RSPO/002**  
 Date of Certificate Issue : 25 November 2015      Date of License Issue : 25 January 2020  
 Date of Certificate Expiry : 24 November 2020      Date of License Expiry : 24 November 2020

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-1.4	19 to 24 August 2019	Andi Pratama Pasaribu (Lead Auditor), Mohamad Amarullah, Rindu Galih Rezza Rachmansyah	Ardiansyah	Octo H.P.N. Nainggolan

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-1.4	09 December 2019

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Figure 1. Location Map of PT Tunggal Mitra Plantation

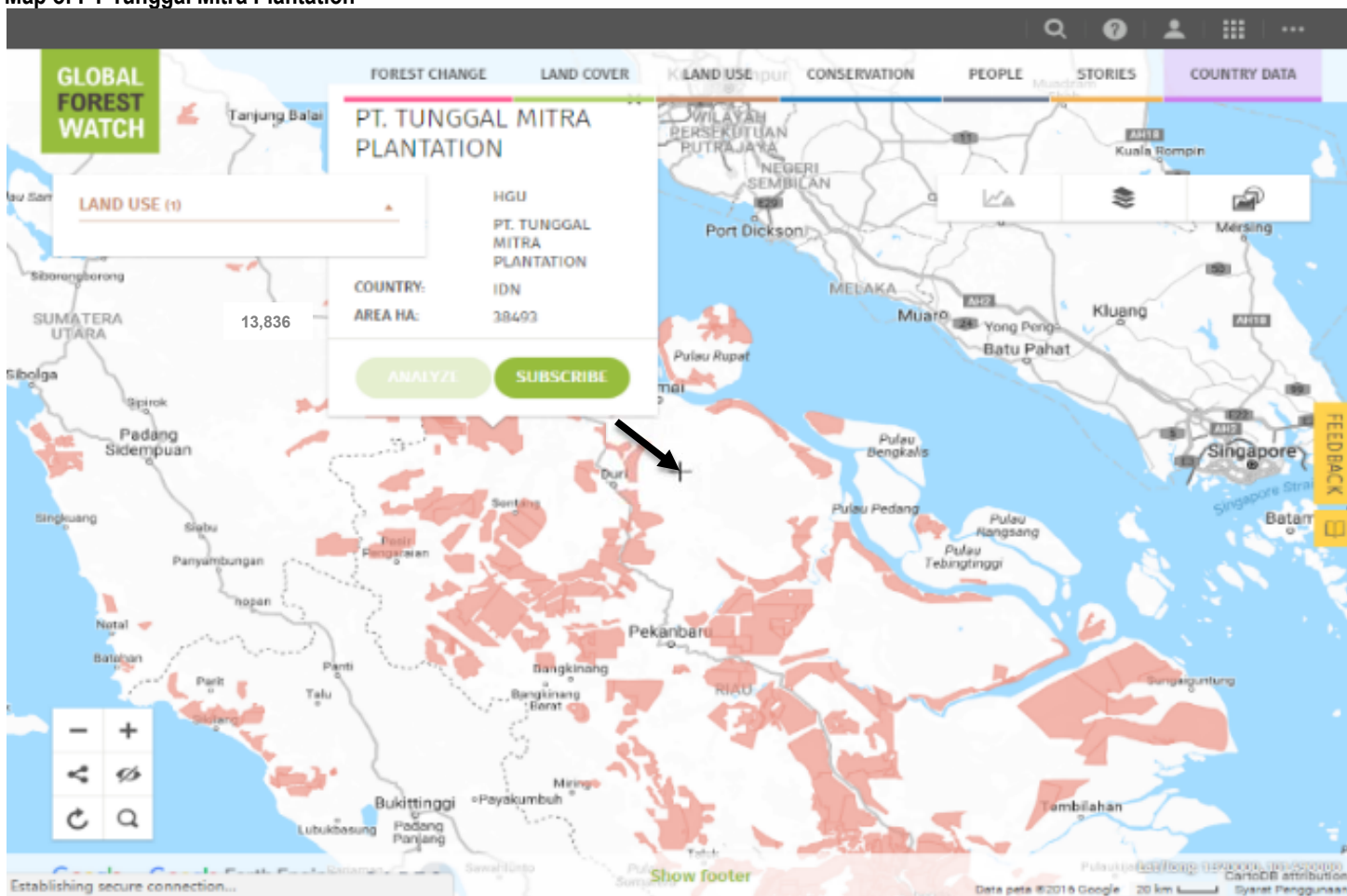
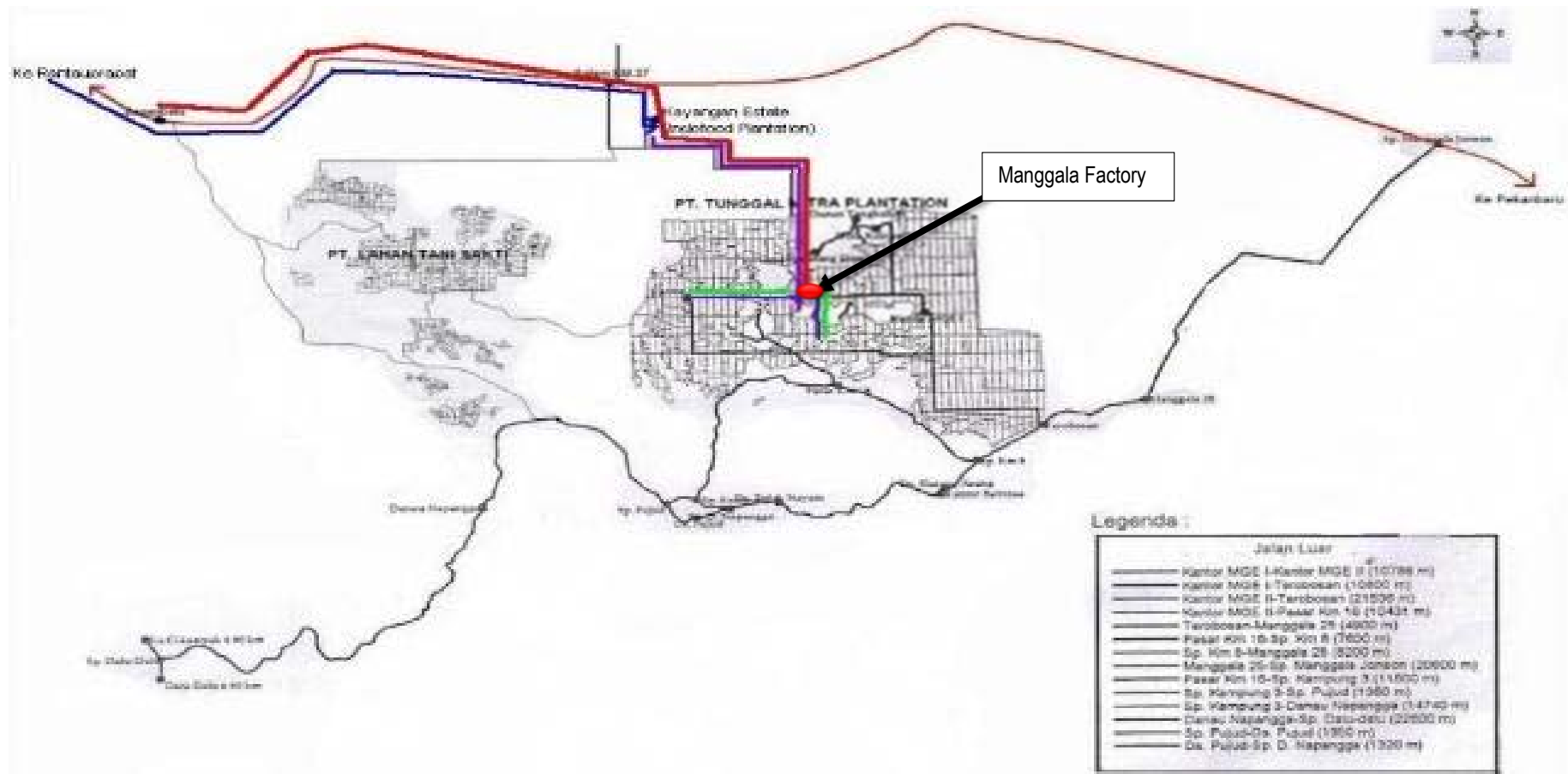


Figure 2. Operational Map of PT Tunggal Mitra Plantation



**Abbreviations Used**

5S	:	<i>Seiri, Seiton, Seiso, Seiketsu, and Shitsuke</i>
AMDAL	:	<i>Analisa Dampak Lingkungan</i> (Environment Impact Assessment)
APAR	:	<i>Alat Pemadam Api Ringan</i> (Fire Extinguisher)
B3	:	<i>Bahan Berbahaya Beracun</i> (Hazardous Material)
BOD	:	Biological Oxygen Demand
BPC	:	Business Planning and Consolidation
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i> (Social Security Agency/Indonesian National Insurance)
CH	:	Certificate Holder
CLA	:	Collective Labor Agreement
CPO	:	Crude Palm Oil
CSR	:	Corporate Social Responsibility
EFB	:	Empty Fruit Bunch
EHS	:	Environment Health & Safety
FFB	:	Fresh Fruit Bunch
FPIC	:	Free Prior Informed Consent
GHG	:	Green House Gas
GM	:	General Manager
H1	:	Menstrual Leave
H2	:	Maternity Leave
HCV	:	High Conservation Value
HGU	:	<i>Hak Guna Usaha</i> . (Land Use Title)
HIRARC	:	Hazard Identification Risk Assessment and Risk Control
IDR	:	Indonesian Rupiah
IPM	:	Integrated Pest Management
ISPO	:	Indonesian Sustainable Palm Oil
IUP	:	<i>Izin Usaha Perkebunan</i> . (Plantation Business Permit)
OHS	:	Occupational Health and safety
KER	:	Kernel Extraction Rate
KTU	:	<i>Kepala Tata Usaha</i> (Head of Administration)
LTA	:	Lost Time Accident
LUCA	:	Land Use Change Analysis
MGE	:	Manggala Estate
MGF	:	Manggala Factory (Manggala POM)
MRC	:	Minamas Research Center
MSDS	:	Material Safety Data Sheet
OER	:	Oil Extraction Rate
OHS	:	Occupational Health & Safety
P2K3	:	<i>Panitia Pembina Kesehatan dan Keselamatan Kerja</i> (OHS Committee)
PIC	:	Person In Charge
PK	:	Palm Kernel
PKK	:	<i>Pembinaan Kesejahteraan keluarga</i> (Family Prosperity Development)
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PPE	:	Personal Protective Equipment
PSD	:	Plantation Services Department
PSQM	:	Plantation Sustainability and Quality Management
RKL/RPL	:	<i>Rencana Kelola Lingkungan / Rencana Pemantauan Lingkungan</i> (Environmental Management Plan / Environmental Monitoring Plan)
RSPO	:	Roundtable on Sustainable Palm Oil
SCCS	:	Supply Chain Certification System
SIA	:	Social Impact Assessment

SOP	:	Standard Operating Procedure
SOU	:	Sime Darby Operating Unit
TMP	:	Tunggal Mitra Plantation
WWF	:	World Wide Fund
WWTP	:	Wastewater Treatment Plant

<b>1.0</b>	<b>SCOPE of the CERTIFICATION ASSESSMENT</b>		
<b>1.1</b>	<b>Assessment Standard Used</b>		
	<ul style="list-style-type: none"> <li>• Indonesian National Interpretation of RSPO P&amp;C 2013 by INA-NITF (Indonesian National Interpretation Task Force) July 2016, endorsed by the RSPO BoG 30th September 2016.</li> <li>• RSPO Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014 revised on 14 June 2017 (Module D for CPO Mill)</li> <li>• RSPO Certification System for Principles and Criteria, 14 June 2017</li> </ul>		
<b>1.2</b>	<b>Organisation Information</b>		
1.2.1	Organisation name listed in the certificate	<b>PT Tunggal Mitra Plantation subsidiary of Sime Darby Plantation Bhd</b>	
1.2.2	Contact person	Alagendran A.L Maniam	
1.2.3	Organisation address and site address	RSO registered company: Sime Darby Plantation Sdn Bhd, Main Block, Level 10, Plantation Tower No.2, Jalan PJU 1A/7, Ara Damansara, 47301 Petaling Jaya, Selangor  Liaison Office: The Plaza Office Tower Lantai 36 Jl MH Thamrin Kav. 28-30 Jakarta 10350	
1.2.4	Telephone	(+62-21)-29926000	
1.2.5	Fax	(+62-21)-29922686	
1.2.6	E-mail	<a href="mailto:alagendran.maniam@simedarbyplantation.com">alagendran.maniam@simedarbyplantation.com</a>	
1.2.7	Web page address	<a href="http://www.simedarbyplantation.com">www.simedarbyplantation.com</a>	
1.2.8	Management Representative who completed the application for certification	Alagendran Maniam (Head of Sustainability – Minamas Plantation)	
1.2.9	Registered as RSPO member	07 September 2004, 1-0008-04-000-00	
<b>1.3</b>	<b>Type of Assessment</b>		
1.3.1	Scope of Assessment and Number of Management Unit	Manggala Mill and 3 Supply Bases (Manggala 1 Estate, Manggala 2 and Manggala 3 Estate)	
1.3.2	Type of certificate	Single	
<b>1.4</b>	<b>Locations of Mill and Plantation</b>		
1.4.1	Location of Mill		
	<b>Name of Mill</b>	<b>Location</b>	<b>Coordinate</b>
			<b>Latitude</b> <b>Longitude</b>
	Manggala Mill	Pujud Village, Pujud Sub-District, Rokan Hilir District, Riau Province, Indonesia	N 01° 31' 16"      E 100° 43' 40"
1.4.2	Location of Certification Scope of Supply Base		
	<b>Name of Supply Base</b>	<b>Location</b>	<b>Coordinate</b>
			<b>Latitude</b> <b>Longitude</b>
	Manggala 1 Estate	Pujud Village, Pujud Sub-District, Rokan Hilir District, Riau Province, Indonesia	N 01° 32' 07"      E 100° 43' 48"
	Manggala 2 Estate	Pujud Village, Pujud Sub-District, Rokan Hilir District, Riau Province, Indonesia	N 01° 31' 54"      E 100° 38' 38"

	Manggala 3 Estate	Pujud Village, Pujud Sub-District, Rokan Hilir District, Riau Province, Indonesia	N 01° 28' 23"	E 100° 45' 32"
<b>1.5</b>	<b>Description of Area Statement</b>			
1.5.1	Tenure			
	• State		13,836.00	Ha
	• Community		-	Ha
1.5.2	<b>Area Statement</b>			
	• Total area		13,836.00	Ha
	• Mature area		8,315.96	Ha
	• Immature area		2,478.86	Ha
	• Mill		15.26	Ha
	• Emplishment & Infrastructure		491.37	Ha
	• Others area		11.72	Ha
	• Nursery		29.23	Ha
	• Occupation		2,472.40	Ha
	• HCV		21.20	Ha
<b>1.6</b>	<b>Planting Year and Cycles</b>			
	Age profile of planting year			
1.6.1	<b>Planting Year</b>	<b>Hectarage (Ha)</b>		
		<b>Manggala-1</b>	<b>Manggala-2</b>	<b>Manggala-3</b>
				<b>Total</b>
	1990	216.41	-	32.70
	1991	38.69	-	530.85
	1992	1,080.74	246.27	208.13
	1993	52.27	-	-
	1994	-	193.00	101.00
	1996	-	61.10	-
	1997	-	220.30	119.58
	1998	-	392.79	46.96
	1999	-	440.39	-
	2000	-	372.20	96.93
	2004	-	50.64	-
	2006	-	48.48	-
	2013	223.45	-	671.93
	2014	395.42	243.00	331.82
	2015	428.85	274.99	415.83
	2016	397.45	-	383.79
	<b>Sub Total Mature</b>	<b>2,833.28</b>	<b>2,543.16</b>	<b>2,939.52</b>
	2017	199.73	397.31	406.67
				<b>1,003.71</b>



	2018	376.00	384.40	168.33	928.73		
	2019	268.75	277.67	-	546.42		
	<b>Sub Total Immature</b>	<b>844.48</b>	<b>1,059.38</b>	<b>575.00</b>	<b>2,478.86</b>		
	<b>Grand Total</b>	<b>3,677.76</b>	<b>3,602.54</b>	<b>3,514.52</b>	<b>10,794.82</b>		
1.6.2	New Planting area after January 2010		- Ha				
1.6.3	Planting Cycle		2 <sup>nd</sup> Cycle				
<b>1.7</b>	<b>Description of Mill and Supply Base</b>						
1.7.1	Description of Mill						
	<b>Name of Mill</b>	<b>Capacity (tonnes/hour)</b>	<b>FFB Processed (tonnes/year)</b>	<b>CPO</b>		<b>Palm Kernel</b>	
				<b>Out put (tonnes)</b>	<b>Extraction (%)</b>	<b>Out put (tonnes)</b>	<b>Extraction (%)</b>
	Manggala Factory	60	177,899	40,132	22.56	8,082	4.54
	<i>*Source: Production data from August 2018 to July 2019</i>						
1.7.2	Description of Certification Scope of Supply Base						
	<b>Name of Estate</b>	<b>Total Area (Ha)</b>	<b>Planted Area (Ha)</b>	<b>FFB (tonnes/year)</b>	<b>Yield (tonnes/ha/year)</b>	<b>Supplied to Mill</b>	
						<b>FFB (tonnes/year)</b>	<b>%</b>
	Manggala-1	4,919.00	3,677.76	64,044	17.41	64,044	36
	Manggala-2	4,922.00	3,602.54	51,591	14.32	51,591	29
	Manggala-3	3,995.00	3,514.52	62,265	17.72	62,265	35
	<b>TOTAL</b>	<b>13,836.00</b>	<b>10,794.82</b>	<b>177,900</b>	<b>16.48</b>	<b>177,900</b>	<b>100</b>
	<i>*Source: Processing data from August 2018 to July 2019</i>						
1.7.3	FFB description from other source						
	<b>Name of sources/Organisation</b>	<b>Type of Organisation</b>	<b>Number of smallholders</b>	<b>Production Area (Ha)</b>	<b>Supplied to Mill FFB (tonnes/year)</b>		
	-	-	-	-	-		
	<b>TOTAL</b>					-	
	<i>*Source: FFB received data from August 2018 to July 2019</i>						
1.7.4	Product categories			FFB, CPO, PK			
<b>1.8</b>	<b>Tonnage of Product</b>						
1.8.1	Past Annual Claim Certified Product			Last Year Projected Certified Volume (MT)		Last Year Actual Certified Volume (MT)	
	• FFB Production			237,791		177,900	
	• CPO Production			54,032		40,132	
	• Palm Kernel (PK) Production			11,014		8,082	
1.8.2	Product selling						
	Tonnage of selling product			Period of actual selling product (MT)			
	• CSPO sold as RSPO certified product			-			

	<ul style="list-style-type: none"> <li>• CSPK sold as RSPO certified product</li> <li>• CSPO sold under other scheme</li> <li>• CSPK sold under other scheme</li> <li>• CSPO sold as conventional</li> <li>• CSPK sold as conventional</li> </ul>	2,046	-	-	38,067	6,031		
1.8.3	Estimate of Certified FFB Claim							
	<b>Name of Estate(s)</b>	<b>Total Area (Ha)</b>	<b>Planted Area (Ha)</b>	<b>FFB (tonnes/year)</b>	<b>Yield (tonnes/ha/year)</b>			
	Manggala-1	4,919.00	3,677.76	69,192	18.81			
	Manggala-2	4,922.00	3,602.54	55,738	15.47			
	Manggala-3	3,995.00	3,514.52	67,270	19.14			
	<b>TOTAL</b>	<b>13,836.00</b>	<b>10,794.82</b>	<b>192,200</b>	<b>17.80</b>			
	<i>*Projected FFB production for 25 November 2019 to 24 November 2020</i>							
1.8.4	Estimate of Certified Palm Product Claim							
	<b>Name of Mill</b>	<b>Capacity (tonnes/ hour)</b>	<b>FFB Processed (tonnes/year)</b>	<b>CPO</b>		<b>Palm Kernel</b>	<b>Supply Chain Module</b>	
				<b>Out put (tonnes)</b>	<b>Extraction (%)</b>	<b>Out put (tonnes)</b>		<b>Extraction (%)</b>
	Manggala	60	192,200	43,250	22.50	9,610	5.00	IP
	<i>*Projected CSPO and CSPK production for 25 November 2019 to 24 November 2020</i>							
<b>1.9</b>	<b>Other Certifications</b>							
	ISPO		ISPO certificate with No. SGS-ID-ISPO-0014 on 04 April 2017 with validity until 03 April 2022 by PT SGS Indonesia					
<b>1.10</b>	<b>Time Bound Plan</b>							
1.10.1	<b>Time Bound Plan for Other Management Units</b>							
	<b>Management Unit</b>		<b>Estate (Supply Base)</b>	<b>Time Bound Plan</b>	<b>Location</b>	<b>Status</b>		
	<b>Mill</b>	<b>Time bound</b>						
	<b>INDONESIA</b>							
1	Sekunyir. PT. Indotruba Tengah	2010	Sekunyir	2010	Seruyan and West Kotawaringin District – Central Kalimantan	Certified		
			Seruyan	2010		Certified		
2	Manggala. PT. Tunggal Mitra Plantations	2010	Manggala 1	2010	Rokan Hilir District – Riau	Certified		
			Manggala 2	2010		Certified		
			Manggala 3	2010		Certified		
3	Bukit Ajong PT. Sime Indo Agro	2010	West	2010	Sanggau District – West Kalimantan	Certified		
			West (HGU on process)	2019		-		
			East	2010		Certified		
			East (HGU on process)	2019		-		
			East Plasma	2010		Certified		

			West Plasma	2010		Certified
			Sei Mawang	2019		-
4	Teluk Siak. PT Aneka Inti Persada	2011	Teluk Siak	2011	Siak District – Riau	Certified
			Pinang Sebatang	2011		Certified
			Aneka Persada	2011		Certified
5	Sungai Pinang. PT. Bina Sains Cemerlang	2012	Sungai Pinang	2012	Musi Rawas District – South Sumatera	Certified
			Sungai Pinang (HGU on process)	2020		-
			Bukit Pinang	2012		Certified
			Bukit Pinang (HGU on process)	2020		-
6	Pemantang. PT. Teguh Sempurna	2011	Pemantang	2011	Seruyan and East Kotawaringin Distri ct – Central Kalimantan	Certified
			Kawan Batu	2011		Certified
			Hatan Tiring	2011		Certified
			Batang Garing	2011		Certified
7	Alur Dumai. PT Lahan Tani Sakti	2011	Alur Dumai	2011	Rokan Hilir District – Riau	Certified
8	Teluk Bakau. PT. Bhumireksa Nusa Sejati	2011	Teluk Bakau	2011	Indra Giri Hilir District – Riau	Certified
			Nusa Perkasa	2011		Certified
			Nusa Lestari	2011		Certified
9	Mandah PT. Bhumireksa Nusa Sejati	2014	Mandah	2011	Indra Giri Hilir District – Riau	Certified
			Rotan Semelur	2011		Certified
10	Angsana. PT Ladangrumpun Suburabadi	2011	Angsana	2011	Tanah Bumbu District – Kalimantan Selatan	Certified
			Gunung Sari	2011		Certified
			Pantai Bonati	2011		Certified
			KKPA-1 PT.SHE	2013		Certified
			KKPA-4 PT.SHE	2013		Certified
11	Mustika. PT Sajang Heulang	2013	Mustika	2013	Tanah Bumbu District – Kalimantan Selatan	Certified
			KKPA-2 PT.SHE	2013		Certified
			KKPA-3 PT.SHE	2013		Certified
			KKPA-5 PT.SHE	2013		Certified
			SAP 1	2020		-
12	Gunung Aru. PT Bersama Sejahtea Sakti	2011	Gunung Aru	2011	Kotabaru District – Kalimantan Selatan	Certified
			Gunung Kemasam	2011		Certified
			Laut Timur	2011		Certified
			Pantai Timur	2011		Certified
			KKPA BSS	2020		-
13	Bebunga. PT. Langgeng Muaramakmur	2011	Bebunga	2011	Kotabaru District – Kalimantan	Certified
			Bakau	2011		Certified

			Sungai Cengal	2011	Selatan	Certified
14	Sukamandang PT Kridatama Lancar	2011	Sukamandang	2011	Seruyan and East Kotawaringin District – Central Kalimantan	Certified
			Sapiri	2011		Certified
			Barasdanum	2011		Certified
			Kuala Kuayan	2011		Certified
15	Pondok Labu. PT Paripurna Swakarsa	2012	Binturung	2012	Kotabaru District – Kalimantan Selatan	Certified
			Pondok Labu	2012		Certified
			Rampa	2012		Certified
			Sesulung	2012		Certified
16	Rantau. PT Laguna Mandiri	2012	Rantau	2012	Kotabaru District – Kalimantan Selatan	Certified
			Matalok	2012		Certified
			KKPA Sungai Cengal (1,382 SH)	2014		Certified
			Selabak (PT SAA)	2012		Certified
			Randi (PT SAA)	2012		Certified
			Sangkoh (PT SAA)	2012		Certified
			Lanting (PT LMR)	2012		Certified
17	Betung. PT Laguna Mandiri	2014	Betung	2012	Kotabaru District – Kalimantan Selatan	Certified
			Sekayu	2012		Certified
18	Ungkaya. PT Tamaco Graha Krida	2012	Ungkaya	2012	Morowali District – Sulawesi Tengah	Certified
			Plasma TGK	2020		-
19	Ladang Panjang. PT Bahari Gembira Ria	2012	Ladang Panjang	2012	Muaro Jambi District - Jambi	Certified
			Ladang Panjang (HGU on process)	2020		-
			Plasma BGR	2020		-
20	Rantau Panjang. PT Guthrie Pecconina Indonesia	2012	Rantau Panjang	2012	Musi Banyuasin District – South Sumatera	Certified
			Rantau Panjang (HGU on process)	2020		-
			Bumi Ayu	2012		Certified
			Karang Ringin	2012		Certified
			Napal	2012		Certified
			Napal (HGU on process)	2020		-
			Mangun Jaya	2012		Certified
			Mangun Jaya (HGU on process)	2020		-
			Sungai Jernih	2020		-
			GPI KKPA	2020		-
21	Blang Simpo. PT Perkasa Subur Sakti	2013	Tamiang (PT PPP)	2013	Aceh Tamiang and East Aceh District – Aceh	Certified
			Batang Ara (PT PSK)	2013		Certified
			Blang Simpo-01	2013		Certified

			Blang Simpo-02	2013		Certified
23	Lembiru. PT Sandika Nata Palma	2014	Lembiru	2014	Ketapang District – West Kalimantan	Certified
			Awatan	2014		Certified
			Karya Palma	2019		-
			KKPA SNP	2020		-
			Pelanjau (PT BAL)	2019		Certified
			Sungai Putih (PT BAL)	2019		-
			Baturus (PT BAL)	2019		-
			KKPA BAL	2020		-
<b>MALAYSIA</b>						
1	Sg Dingin SOU 1	2010	Bukit Hijau	2010	Kerangan, Kedah	Certified
			Padang Buluh	2010		Certified
			Bukit Selangor	2010		Certified
			Sg Dingin	2010		Certified
			Jentayu	2010		Certified
			Anak Kuli	2010		Certified
			Somme	2010		Certified
2	Chersonese SOU 2	2011	Chersonese	2011	Kuala Kurau, Perak	Certified
			Holyrood	2011		Certified
			Kalumpang	2011		Certified
			Tali Ayer	2011		Certified
3	Elphil SOU 3	2011	Kinta Kellas	2011	Sg Siput, Perak	Certified
			Elphil	2011		Certified
			Kamuning	2011		Certified
4	Flemington SOU 4	2011	Flemington	2011	Teluk Intan, Perak	Certified
			Bagan Datoh	2011		Certified
			Sabak Bernam	2011		Certified
			Sg Samak	2011		Certified
5	Seri Intan SOU 5	2011	Seri Intan (Main Division)	2011	Teluk Intan, Perak	Certified
			Sabrang	2011		Certified
			Sg Wangi	2011		Certified
			Sogomana (Main Division)	2011		Certified
6	Selaba SOU 5	2011	Seri Intan (Selaba Division)	2011	Teluk Intan, Perak	Certified
			Sogomana (Cashwood & Sg Beruas Division)	2011		Certified
			Bikam	2011		Certified
			Clumy	2011		Certified
7	Tenamaram	2011	Tenamaram	2011	Bestari Jaya,	Certified

	SOU 6				Selangor	
			Sungei Buloh	2011		Certified
			Bkt Talang	2011		Certified
8	Bkt Kerayong SOU 7	2011	Bkt Kerayong	2011	Kapar, Selangor	Certified
			Bkt Cherakah	2011		Certified
			Bkt Rajah	2011		Certified
			Bkt Lagong	2011		Certified
			Elmina	2011		Certified
9	East SOU 8	2010	East	2010	Carey Island, Selangor	Certified
			Dusun Durian	2010		Certified
			Sepang	2010		Certified
10	West - SOU 9	2010	West	2010	Carey Island, Selangor	Certified
11	Bukit Putri - SOU 10	2011	Bukit Putri	2011	Raub, Pahang	Certified
12	Kerdau SOU 11	2011	Kerdau	2011	Temerloh, Pahang	Certified
			Jentar	2011		Certified
			Mentakab	2011		Certified
			Sg Mai	2011		Certified
			Chenor	2011		Certified
13	Jabor - SOU 12	2011	Jabor	2011	Kuantan, Pahang	Certified
14	Labu SOU 13	2011	Labu	2011	Nilai, Negeri Sembilan	Certified
			New Labu	2011		Certified
			Bradwall	2011		Certified
15	Tanah Merah SOU 14	2010	Tanah Merah	2010	Port Dickson, Negeri Sembilan	Certified
			Sua Betong	2010		Certified
			Bukit Pelandok	2010		Certified
16	Sua Betong SOU 15	2014	Salak	2014	Port Dickson, Negeri Sembilan	Certified
			Sengkang	2014		Certified
			Siliau	2014		Certified
			PD Lukut	2014		Certified
			Sungai Baru	2014		Certified
			Tampin Linggi	2014		Certified
17	Kok Foh SOU 16	2011	Bukit Pilah	2011	Bahau, Negeri Sembilan	Certified
			Kok Foh	2011		Certified
			Muar River	2011		Certified
			St. Helier	2011		Certified
			Pertang	2011		Certified
			Sg Gemas	2011		Certified

			Sg Sebaling	2011		Certified
			Sg Senarut	2011		Certified
18	Kempas SOU 17	2010	Kempas	2010	Jasin, Melaka	Certified
			Kemuning	2010		Certified
			Tangkah	2010		Certified
19	Diamond Jubilee SOU 18	2011	Bukit Asahan	2011	Jasin, Melaka	Certified
			Diamond Jubilee	2011		Certified
			Serkam	2011		Certified
20	Pagoh SOU 19	2014	Pagoh	2014	Muar, Johor	Certified
			Lanadron	2014		Certified
			Pengkalan Bukit	2014		Certified
			Welch	2014		Certified
21	Chaah SOU 20	2010	North Labis	2010	Chaah, Johor	Certified
			Cha'ah	2010		Certified
			Sg Simpang Kiri	2010		Certified
22	Gunung Mas SOU 21	2010	Gunung Mas	2010	Kluang, Johor	Certified
			Kempas Klebang	2010		Certified
			Bukit Paloh	2010		Certified
			Yong Peng	2010		Certified
23	Bukit Benut SOU 22	2011	Bukit Benut	2011	Kluang, Johor	Certified
			CEP Niyor	2011		Certified
			Lambak / Elaeis	2011		Certified
24	Ulu Remis SOU 23	2011	Pekan	2011	Layang-layang, Johor	Certified
			Sembrong	2011		Certified
			Tun Dr. Ismail	2011		Certified
			Ulu Remis	2011		Certified
			Bukit Badak	2011		Certified
			Cenas	2011		Certified
25	Hadapan SOU 24	2011	CEP Rengam	2011	Layang-layang, Johor	Certified
			Kulai	2011		Certified
			Layang	2011		Certified
			Seri Pulai	2011		Certified
26	Sandakan Bay SOU 26	2008	Tun Tan Siew Sin	2008	Sandakan, Sabah	Certified
			Tunku	2008		Certified
			Tigowis	2008		Certified
			Sentosa	2008		Certified
			Saguliud	2008		Certified

27	Melalap SOU 27	2011	Melalap	2011	Tenom, Sabah	Certified
			Sapong	2011		Certified
28	Binuang SOU 28	2009	Tingkeyu	2009	Kunak, Sabah	Certified
			Sungang	2009		Certified
			Jelata Bumi	2009		Certified
			Binuang	2009		Certified
29	Giram SOU 29	2009	Mostyn	2009	Kunak, Sabah	Certified
			Giram	2009		Certified
30	Merotai SOU 30	2009	Imam	2009	Tawau, Sabah	Certified
			Merotai	2009		Certified
			Table	2009		Certified
			Tiger	2009		Certified
31	Lavang SOU 31	2011	Belian	2011	Bintulu, Serawak	Certified
			Kelida	2011		Certified
			Lavang	2011		Certified
			Lavang (SE)	2011		Certified
			Rasan	2011		Certified
			Chartquest	2011		Certified
			Dulang	2011		Certified
			Peroh	2011		Certified
			Pekaka	2011		Certified
			Ruai	2011		Certified
32	Rajawali SOU 32	2011	Rajawali	2011	Bintulu, Serawak	Certified
			Samudera	2011		Certified
			Semarak	2011		Certified
			Bayu	2011		Certified
33	Derawan SOU 33	2011	Takau	2011	Bintulu, Serawak	Certified
			Damai	2011		Certified
			Derawan	2011		Certified
			Sahua	2011		Certified
<b>LIBERIA</b>						
1	Grand Cape Mount	2018	Matambo	2018	Grand Cape Mount, Liberia	IC
			Grand Cape Mount	2018		IC
			Zodua	2018		IC
			Bomi	2018	Bomi, Liberia	IC
				Lofa		2018
<b>P &amp; G (New Britain Palm Oil)</b>						



1	Poliamba	2012	Kara	2012	Kevieng, New Ireland Province, P&G	Certified
			West Coast	2012		Certified
			Nalik	2012		Certified
			Noatsi	2012		Certified
			Madak	2012		Certified
			North (Smallholders)	2012		Certified
			South (Smallholders)	2012		Certified
			West (Smallholders)	2012		Certified
2	Tetere	2011	Tetere	2011	Gudaicanal, Slomon Island	Certified
			Ngalimbiu	2011		Certified
			Mbalisuna	2011		Certified
			West Zone (Smallholders)	2011		Certified
			Central Zone (Smallholders)	2011		Certified
			MBA East (Smallholders)	2011		Certified
			MBA West (Smallholders)	2011		Certified
3	Sangara, Sambiripa & Mamba	2013	Sangara	2013	Higaturu, Popondetta, Oro, P&G	Certified
			Sumberipa	2013		Certified
			Ambogo	2013		Certified
			Embi	2013		Certified
			Mamba	2013		Certified
			Sorovi (smallholders)	2013		Certified
			Igora (smallholders)	2013		Certified
			Saiho (smallholders)	2013		Certified
			Aeka (smallholders)	2013		Certified
			Ilimo (smallholders)	2013		Certified
4	Gusap	2010	Dumpu	2010	Madang, P&G	Certified
			Surinam	2010		Certified
			Jephcott	2010		Certified
			Gusap	2010		Certified
			Paddox	2010		Certified
			Ngaru	2010		Certified
			Madang VOP (smallholders)	2010		Certified
			Morobe VOP (smallholders)	2010		Certified
5	Hagita	2013	Giligili	2013	Milne Bay, P&G	Certified
			Hagita	2013		Certified
			Waigani	2013		Certified

			Sagarai	2013		Certified
			Padipadi	2013		Certified
			Mariawatte	2013		Certified
			East Gurney	2013		Certified
			West Gurney	2013		Certified
			East Sagarai	2013		Certified
			West Sagarai	2013		Certified
6	Mosa Kumbango Kapiura Namumdo Waraston	2008	Bebere	2008	West New Britain	Certified
			Kumbango	2008		Certified
			Togulo	2008		Certified
			Dami	2008		Certified
			Waisisi	2008		Certified
			Kautu	2008		Certified
			Karaus	2008		Certified
			Moroa	2008		Certified
			Bilomi	2008		Certified
			Loata	2008		Certified
			Haella	2008		Certified
			Garu	2008		Certified
			Daliavu	2008		Certified
			Sapuri	2008		Certified
			Malilimi	2008		Certified
			Rigula	2008		Certified
			Nomundo	2008		Certified
			Navarai / Karato ME	2008		Certified
			Volupai . Lotomgam / Natupi / Goruru	2008		Certified
			Lolokoru	2008		Certified
			Silovoti	2008		Certified
			LSS Hoskin (1,877 Smallholders)	2008		Certified
			VOP East (1,815 Smallholders)	2008		Certified
			VOP Central (1,958 Smallholders)	2008		Certified
			VOP West (1,277 Smallholders)Kaulong / Akamie / Pusiki / Repamira / Sakapei / KDC ME (21 large smallholders)	2008		Certified
			LSS Kapiura (847 Smallholders)	2008		Certified

		VOP Kapiura (551 Smallholders)	2008	Certified
	<p>Sime Darby has achieved 34 management units in Malaysia, 25 management units in Indonesia, 10 management units in P&amp;G that RSPO certified. Total management unit in Sime Darby Plantation Bhd are 34 in Malaysia, 25 in Indonesia and 10 in P&amp;G. In the year of 2016 &amp; 2017 there are three Mill that are no longer operating, and for the supplying base (Estate) is diverted to a mill that is still operating and has been certified RSPO. The mills are:</p> <ol style="list-style-type: none"> <li>1. Angsana Mini Mill, PT Sajang Heulang: Mill stop operate since 2016 and the supply bases is transfer to Angsana POM, PT Ladangrumpun Subur Abadi.</li> <li>2. Selabak Mill, PT Swadaya Andhika: Mill stop operate since.2017 and the supply bases is transfer to Rantau POM, PT Laguna Mandiri</li> <li>3. Pekaka, SOU 34: Mill stop operate since 2017 and the supply bases is transfer to Lavang, SOU 31</li> </ol> <p>Mill in Liberia commissioning in February 2016. Preparation to undergo the RSPO Certification process is in progress and Sime Darby Plantation Bhd targets to undergo RSPO Certification by end 2017. RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps is in progress.</p> <p>The Time Bound Plan above is in line with the latest time bound plan that signed by the management Head of Sustainability Minamas as per 12 April 2019 where PT Mitra Austral Sejahtera is officially exclude from Sime Darby Plantation Berhad per 25 June 2019.</p> <p>Sime Darby has informed the Time Bound Plan progress, MUTU has consider that Sime Darby still comply with the RSPO requirement for partial certification.</p>			
1.10.2	<p><b>Progress of Associated Smallholders and Outgrowers for Certifiable Standard</b></p> <p>Manggala POM – PT Tunggal Mitra Plantation palm oil mill does not received from other non certified RSPO associates outgrowers.</p>			

<b>2.0</b>	<b>ASSESSMENT PROCESS</b>
<b>2.1</b>	<b>Assessment Team</b>
<b>ASA-1.4</b>	<p>1. <b>Andi Pratama Pasaribu (Lead Auditor)</b>. Indonesian citizen. Bachelor degree, majoring social economy. He has several of work experiences (more than 5 years) as the operational staff since 2008. He has been followed the Training of Lead Auditor Indonesian Sustainable Palm Oil (ISPO) which was held by ISPO Commission in 2013 and Training of Lead Auditor Roundtable on Sustainable Palm Oil (RSPO) by Proforest and Daemeter in 2016. He has been attended several kinds of training related to sustainability palm oil audit such as High Conservation Value (HCV) Training, Lead Auditor ISO 9001:2008, Lead Auditor ISO 14001:2005, auditor OHSAS, lead auditor RSPO supply chain by BMTRADA etc. He has some experiences of RSPO audit in Indonesian palm oil in aspect of best management practices, land legality, environmental, social and worker welfare aspect. During this assessment has verify legal, social, worker welfare and supply chain aspect.</p> <p>2. <b>Mohamad Amarullah (Auditor)</b>. Indonesian Citizen. Master of Wood Science and Technology and Bachelor of Forestry, majoring in Forest Product Technology. Has experiences as an Agronomist and Research Assistant in Indonesia and Malaysia from 2008 to 2014. Has been attended several trainings such as Lead Auditor of ISPO, RSPO, ISO 17021, ISO 17065, ISO 9001, ISO 19001, ISO 14001, HCV, etc. Has been conducted several ISPO audit scheme as an Auditor since 2014 in BMP, environment, conservation and OHS aspect. Fluent in Bahasa, Malay and English. During this assessment has verified BMP, long term management plan, environment, GHG, transparency and OHS aspect.</p> <p>3. <b>Rindu Galih Rezza Rachmansyah (Trainee Auditor)</b>. Indonesian citizen, Bachelor of Agriculture department of plant and pest disease (Agrotechnology). He has 1 year experience as Field Expert in Pesticide Company and 3 years experience in Industrial Forest Management, Forest Rehabilitation and Reclamation on BUMN Indonesia as Assistant. Training which had attended including Training Lead Auditor ISO 9001, ISO 14001, ISO 17021, ISO 19011, Training Lead Auditor ISPO, Training Lead Auditor RSPO, RaCP and NPP awareness for RSPO, OHSAS 18001 : 2007. He has been involved in several audit activities related to sustainable palm oil certification since 2017 covering Best Management Practices aspect, OHS aspect, social aspect and worker welfare aspect. During this assessment he support verify worker welfare and OHS aspect.</p>
<b>2.2</b>	<b>Assessment Methodology, Assessment Process and Locations of Assessment</b>
<b>2.2.1</b>	<b>Figure of person days to implement assessment</b>
<b>ASA-1.4</b>	<p>Number of auditors: 2 auditor and 1 auditor trainee          Number of days for ASA-1.4 at site: 5 days          Number of working days for ASA-1.4 at site: 10 working days</p>
<b>2.2.2</b>	<b>Assessment Process</b>
<b>ASA-1.4</b>	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Tunggal Mitra Plantation to the requirements of <b>Indonesian National Interpretation of RSPO Principles and Criteria 2013 by INA-NITF, July 2016 (Endorsed by the RSPO Board of Governors meeting on 30<sup>th</sup> September 2016 and RSPO Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014 revised on 14 June 2017 (Module D for CPO Mill)</b></p> <p>Auditor team traveling on Monday, 19 August 2019 using direct flight from Jakarta to Pekanbaru and picked up by management in Sultan Syarif Kasim II Airport. It take time approximately 6 hours from Pekanbaru (airport) to site of PT. Tunggal Mitra Plantation. Opening meeting has been held on the same days in meeting room of Manggala 1 Estate. It attended by auditor team and management representatives. Document verification conducted in the same place. Closing meeting held on Friday 23 August 2019. There is no diverging opinion that delivered by auditee during the closing meeting.</p> <p>The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) interview, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site.</p>

	<p>Some opportunities for improvement of the results <b>ASA-1.4</b> delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase (<b>Re-Certification</b>). Improvement of findings from <b>ASA-1.3</b> findings were observed by auditors at this <b>ASA-1.4</b> assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of <b>ASA-1.4</b>.</p> <p>The assessment program please find Appendix 2</p>
<p><b>2.2.3</b></p>	<p><b>Locations of Assessment</b></p>
<p><b>ASA-1.4</b></p>	<p>Number of units in this certification activity is 3 (three) estates, which supply the raw material (FFB) to Manggala POM. In conducting the assessment, the team of auditors use the clause 4.7.1 on RSPO Certification System For Principle and Criteria (Endorsed June 2017) “<i>The CB’s procedures shall include the sampling methodology (see 4.7.2) for initial certification, surveillance and re-certification audits, where there are more than four estates or associated smallholders, otherwise all estates must be visited as part of the assessment</i>”. The team of auditors determined that the sampling locations regarding to the standard are 1 (one) Palm Oil Mill (Manggala POM) and 3 (three) estates (Manggala 1, Manggala 2 and Manggala 3 Estates).</p> <p><b>Manggala POM – 20 August 2019</b></p> <ul style="list-style-type: none"> <li>• <b>Security Gate.</b> Observation and interview with security officer regarding of receive and dispatch procedure.</li> <li>• <b>Weighbridge.</b> Observation and interview with weighbridge operator regarding of receive and dispatch procedure, recapitulation, labour issue etc.</li> <li>• <b>Loading Ramp Station.</b> Observation and interview with 2 FFB Grader, on their understanding towards technical, OSH, manpower and environment, as well as facilities provided by the company.</li> <li>• <b>Sterilizer Station.</b> Observation and interview with 2 Operators, on their understanding towards technical, OSH, manpower and environment, as well as facilities provided by the company.</li> <li>• <b>Clarification Station.</b> Observation and interview with 1 Operator, on his understanding towards technical, OSH, manpower and environment, as well as facilities provided by the company.</li> <li>• <b>Press Station.</b> Observation and interview with 1 Operator, on his understanding towards technical, OSH, manpower and environment, as well as facilities provided by the company.</li> <li>• <b>Kernel Station.</b> Observation and interview with 1 Operator, on his understanding towards technical, OSH, manpower and environment, as well as facilities provided by the company.</li> <li>• <b>Engine Room.</b> Observation and interview with 1 Operator, on his understanding towards technical, electricity and maintenance, OSH, manpower and environment, as well as facilities provided by the company. The mill has 2 Generators with each of capacity was 500 kVA.</li> <li>• <b>Boiler Station.</b> Observation and interview with 2 Operators, on their understanding towards technical, OSH, manpower and environment, as well as facilities provided by the company. The mill has Boiler with capacity 45 ton/hour and turbine 2 x 1,500 kW.</li> <li>• <b>Water Treatment plant.</b> Observation and Interview with workers related to understanding over the applicable SOP, implementation of OHS, training from company and worker welfare.</li> <li>• <b>Water Intake.</b> Observation related to water source and water flowmeter.</li> <li>• <b>Empty Bunch Area.</b> Observation related to empty bunch management.</li> <li>• <b>Hazardous Waste Temporary Storage.</b> Observation and Interview with workers related to understanding over the applicable SOP, implementation of OHS, training from company and worker welfare.</li> <li>• <b>Chemical Storage.</b> Observation and Interview with workers related to understanding over the applicable SOP, implementation of OHS, training from company and worker welfare.</li> <li>• <b>Oil &amp; Grease Storage.</b> Observation and Interview with workers related to understanding over the applicable SOP, implementation of OHS, training from company and worker welfare.</li> <li>• <b>Central Warehouse.</b> Observation and Interview with workers related to understanding over the applicable SOP, implementation of OHS, training from company and worker welfare.</li> <li>• <b>Workshop.</b> Observation and Interview with workers related to understanding over the applicable SOP, implementation of OHS, training from company and worker welfare.</li> <li>• <b>Effluent Pond.</b> Observation related to effluent monitoring and management.</li> <li>• <b>Effluent Outlet.</b> Observation related to effluent monitoring and management.</li> </ul>

- **Housing Complex Mill.** Observation related to employee facilities, management of domestic waste, emergency response facilities, provision of clean water and electricity.

**Manggala 1 Estate – 20 August 2019**

- **Boundary Poles No. 06, Block A19.** Observation of land demarcation marker and it maintenance.
- **HCV Area, Riparian of Bangko River, Block A19.** Observation of HCV management and monitoring.
- **Division 2 Block E010** which planted in 2018. Observation to replanting area management, which included land clearing method, land cover crop (LCC), beneficial plants and **Barn Owl Box (BOB)**.
- **Division 3 Block E011.** Observation to RP application with dosage 1.25 kg/palm, as well as interview with Foreman and 4 **fertilizer applicators** (all female), on their understanding towards technical, safety, manpower, conservation and environment aspects, included facilities provided by the company.
- **Division 3 Block D013** which planted in 2018. Observation to replanting area management, which included land clearing method, land cover crop (LCC), beneficial plants, terraces planting pattern and **Barn Owl Box (BOB)**. The Block is located in adjacent with occupation area by Pematang Damar Communities which currently planted by rubber and mixed plants. The occupation areas was divided by roads.
- **Division 4 Block B013** which planted in 2019. Observation to **EFB mulching** in palm circle with dosage recommended was 30 ton/ha/year or about 200 kg/palm/year. Observation has also conducted on replanting area management, which included land clearing method, land cover crop (LCC), beneficial plants, terraces planting pattern and Barn Owl Box (BOB). The Block is located in adjacent with occupation area by Pematang Damar Communities which currently planted by palms, rubber and mixed plants. The occupation areas was divided by isolation drains.
- **Division 4 Block G32/33.** Observation to Ken-Up and Kenly application and interview with Foreman and 6 **pesticide applicators** (all female), on their understanding towards technical, safety, manpower, conservation and environment aspects, included facilities provided by the company.
- **Division 2 Block E007.** Observation to harvesting C1R2 activities and interview with Foreman and 1 team which consist of 3 **harvester**, on their understanding towards technical, safety, manpower, conservation and environment aspects, included facilities provided by the company.
- **Division 2 Block G007.** Observation to **Peat Subsidence Pole** and **Piezometer No. 01** which installed in 2015. According to measurement, subsidence rate in this particular block was 2.25 cm/year.
- **Housing Complex Division 4.** Observation related to employee facilities, management of domestic waste, emergency response facilities, provision of clean water and electricity.
- **Block Spraying System House.** Observation and Interview with workers related to understanding over the applicable SOP, implementation of OHS, training from company and worker welfare.
- **Housing Complex Division 2.** Observation related to employee facilities, management of domestic waste, emergency response facilities, provision of clean water and electricity.
- **Clinic.** Observation and Interview with workers related to employee facility, implementation of OHS, training from company and worker welfare.
- **Elementary & Middle School.** Observation related employee facility.
- **Child Daycare.** Observation and Interview with workers related to employee facility, implementation of OHS, training from company and worker welfare.
- **Firefighting Storage.** Observation and Interview with workers related to understanding over the applicable SOP, implementation of OHS, training from company and worker welfare.
- **Solar Tank.** Observation related to understanding over the applicable SOP, implementation of OHS, training from company and worker welfare.
- **Spare Part Warehouse.** Observation related to understanding over the applicable SOP, implementation of OHS, training from company and worker welfare.
- **Chemical Warehouse.** Observation and Interview with workers related to understanding over the applicable SOP, implementation of OHS, training from company and worker welfare.
- **Fertilizer Warehouse.** Observation and Interview with workers related to understanding over the applicable SOP, implementation of OHS, training from company and worker welfare.
- **Oil Storage.** Observation related to understanding over the applicable SOP, implementation of OHS, training from company and worker welfare.



- **Rice Storage.** Observation related to understanding over the applicable SOP, implementation of OHS, training from company and worker welfare.
- **Landfill.** Observation related to domestic waste management.
- **Land Application Block E11 Division 3.** Observation related to effluent application and management.

**Manggala 2 Estate – 21 August 2019**

- **Boundary Poles No. 65, Block I05.** Observation of land demarcation marker and it maintenance.
- **Housing complex, workshop, agrochemical store, daycare, water source and firefighting facilities.** Observation of workers facilities and it management. There is more than 262 unit house for field supervisor and employees, office, worship place, central store, kindergarten, elementary school, meeting room, water catchment area and sport facilities.
- **Division 4 Block E001** which planted in 2018. Observation to **replanting** area management, which included land clearing method, terraces plnting pattern, land cover crop (LCC), beneficial plants and **Barn Owl Box (BOB)**. The Block is located in adjacent with occupation area by Sukamulya Village Communities which currently planted by rubber. The occupation areas was divided by roads.
- **Division 4 Block B005.** Observation to harvesting C1R2 activities and interview with Foreman and 1 team which consist of 3 **harvester**, on their understanding towards technical, safety, manpower, conservation and environment aspects, included facilities provided by the company. Income distribution for FFB cutter and carriers was 35 % and 32.5 %, respectively.
- **Division 3 Block C005.** Observation to Kenlon application and interview with Foreman and 3 **pesticide applicators** (all male), on their understanding towards technical, safety, manpower, conservation and environment aspects, included facilities provided by the company.
- **Division 4 Block B001.** Observation to **Leaf Eating Catterpillar (LEC) census** activity and interview with Foreman and 2 workers, on their understanding towards technical (sampling method, pest knowledge, threshold limit, pest population control and monitoring, etc.), safety, manpower, conservation and environment aspects, included facilities provided by the company.
- **Division 4 Block C002** which planted in 2018. Observation to **replanting** area management, which included land clearing method, terraces plnting pattern, LCC, beneficial plants, BOB and EFB mulching on palm circle.
- **Division 2 Block F004.** Observation to NPK 44 application with dosage 3.0 kg/palm, as well as interview with Foreman and 2 **fertilizer applicators** (all female), on their understanding towards technical, safety, manpower, conservation and environment aspects, included facilities provided by the company.

**Manggala 3 Estate – 21 August 2019**

- **Manuring Block L14 Division 2.** Observation and Interview with workers related to understanding over the applicable SOP, implementation of OHS, training from company and worker welfare.
- **Manual Weeding Block J04 Division 2.** Observation and Interview with workers related to understanding over the applicable SOP, implementation of OHS, training from company and worker welfare.
- **Harvesting Block K04 Division 1.** Observation and Interview with workers related to understanding over the applicable SOP, implementation of OHS, training from company and worker welfare.
- **Barn Owl Box Block K04 Division 1.** Observation related to Integrated Pest Management.
- **Replanting Area Block H29-H31 Division 4.** Observation related to Land Clearing without burning and Land Cover Crop management.
- **Boundary Poles No. 49, Block I07.** Observation of land demarcation marker and it maintenance.
- **Housing complex, workshop, agrochemical store, daycare, water source and firefighting facilities.** Observation of workers facilities and it management. There is more than 145 unit house for field supervisor and employees, office, worship place, central store, kindergarten, elementary school, meeting room, water catchment area and sport facilities.

**Stakeholder**

- Public consultation with government of Rokan Hilir, Province of Riau (by phone) on 19 August 2019.
- Public consultation with surrounding community (Local Contractor, NGO local communities) on 22 August 2019.

	<ul style="list-style-type: none"> <li>Public consultation with Internal Stakeholders (Gender Committee, Labor Union and Worker Cooperative) on 19 August 2019.</li> </ul>
<b>2.3</b>	<b>Stakeholder Consultation and Stakeholders Contacted</b>
<b>2.3.1</b>	<b>Summary of stakeholder consultation process.</b>
<b>ASA-1.4</b>	<p>The public consultation with stakeholders to PT Tunggal Mitra Plantation done through:</p> <ul style="list-style-type: none"> <li>Conduct a public announcement on the CB website (<a href="http://www.mutucertification.com">www.mutucertification.com</a>) on 12 August 2019.</li> <li>Conducting public consultation with relevant agencies in Rokan Hilir (Labour Agency, Plantation Agency, Environment Agency and National Land Agency) on 19 August 2019.</li> <li>Conduct consultations via email questionnaire to NGOs (Aliansi Masyarakat Adat Nusantara, Sawit Watch, Wahana Lingkungan Hidup Indonesia and World Wide Fund for Nature) on 13 August 2019.</li> <li>Conducting visits and direct interviews with stakeholders (Local Communities) on 22 August 2019.</li> <li>Conducting Interviews with the Cooperative Employees, local contractor, Gender Committee, Labor Union on 22 August 2019.</li> </ul>
<b>2.3.2</b>	<b>Stakeholder contacted</b>
	<i>Please find appendix 1</i>
<b>2.4</b>	<b>Determining Next Assessment</b>
	The next visit ( <b>Re-Certification</b> ) will be conducted eight (8) to twelve (12) after date of certificate



**3.0. ASSESSMENT FINDINGS**

**3.1. Summary of Assessment Report of the RSPO Certification**

MUTUAGUNG LESTARI has conducted an assessment of **Manggala POM – PT Tunggal Mitra Plantation subsidiary of Sime Darby Plantation Bhd** operation consisting of one (1) mill and three (3) oil palm estates.

During the assessment, there were three (3) Nonconformities were assigned against Major Compliance Indicators, one (1) nonconformities were assigned against Minor Compliance Indicators and three (3) opportunities for improvement were identified. However, according to the certification system, this does not cause the certificate to be suspended.

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.

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

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

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
<b>PRINCIPLE #1 COMMITMENT TO TRANSPARENCY</b>		
<b>1.1</b>	<b>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.</b>	
<b>1.1.1</b>	<p>The company has a SOP of Revision Information Request 03 on September 18, 2016 which lists the types of information that can be accessed publicly by stakeholders, including: Area of Land Clearing, immature plant, infrastructure, Proof of social security payment, Proof of payment of employee medication, Employee data, School student data, Employee public facilities, Data on pest and disease management, Data on light vehicles and heavy equipment, Data on supporting machines, CSR, Bridge data, Road length data, Work building data, Public building data, School building data, Types of fertilizers used, Types of agrochemicals used and other information.</p> <p>The company routinely disseminates these SOPs to relevant stakeholders every year, this is shown by the evidence of SOP socialization given on March 29, 2019 to the people of the surrounding villages. This is in line with the results of interviews with the people of Sukajadi Village. It is known that the community and the village have known about the procedure for requesting information owned by the company and one of the ways is to send a request for information to the company. If there is a request for information from the surrounding community, it will be sent in written form or proposal to the company and the company will immediately respond to the letter.</p>	
<b>1.1.2</b>	<p>The company has an SOP to respond to stakeholders contained in the SOP for Information Request document Request for Information No revision 03 dated 18 September 2016. This procedure describes how stakeholder communication is. The document explains how to communicate with staff and outsiders. The procedure for requesting information can be detailed as follows:</p> <ul style="list-style-type: none"> <li>All incoming requests for information will go to the operational unit and will be studied and made an answer by the manager of the operational unit</li> </ul>	

- All responses to requests for information to be sent to parties must be signed by the Operations Unit Manager. The PIC appointed as the person responsible for responding and recording requests for information coming from the stakeholders is the Head of Section / Head of Administration.

Based on the SOP for information requests it is known that the time for responding to requests for information is 1 week if it only requires approval from the manager and 1 month if it requires higher approval like the Head Department.

Based on interviews with the people of Sukajadi Village, it is known that so far the company has always responded to all incoming letters, but in 2019 there was no letter of request for information that was responded to beyond its time (1 month). This is in line with the results of the document review and it is known that there are requests for information and so far most of the incoming letters have only been in the form of invitations or requests for assistance.

**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 company has a SOP of Revision Information Request 03 on September 18, 2016 which lists the types of information that can be accessed publicly by stakeholders, including: Area of Land Clearing, immature plant, infrastructure, Proof of social security payment, Proof of payment of employee medication, Employee data, School student data, Employee public facilities, Data on pest and disease management, Data on light vehicles and heavy equipment, Data on supporting machines, CSR, Bridge data, Road length data, Work building data, Public building data, School building data, Types of fertilizers used, Types of agrochemicals used and other information. The above documents can be provided that they do not have a negative impact on the environment, social, and continuity of the company's activities. All documents are stored in each plantation and mill unit as stated in the Information Request SOP.

**Status: Comply**

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

**1.3.1**  
PT Tunggal Mitra Plantation is committed to the code of integrity and ethical behavior recorded in SOP Code of Conduct No. 440 / HRM-COC / 07 which was passed on December 17, 2007 and the SOP was made in Indonesian. SOP explained that the company has an ongoing commitment to building long-term mutually beneficial relationships with stakeholders, such as optimally increasing shareholder value. Treat employees equally, do not distinguish between ethnicity, religion and race in all aspects. Providing products and services of the highest standard, honest and ethical, paying attention to customer complaints. Make a positive and beneficial contribution to improving the quality of people's lives. Do not carry out political activities and are not affiliated with political parties and do not make any contribution regarding political activities and are not permitted to give, offer or accept anything of value that can be categorized as a bribe to or from customers, angry & service providers or government officials and other parties so that they can influence the desired decision.

Based on interviews with local workers and contractors, it was found that the company had socialized the code of ethics at the time of signing the contract for the contractors, while for the workers, the company had conducted the socialization at the time of the muster morning. The following are examples of socialization given by the company:

- Code of Conduct socialization on February 14, 2019 which was attended by 427 participants.
- Code of Conduct socialization on February 20, 2019 which was attended by 351 participants.
- Code of Conduct socialization on February 8, 2019 which was attended by 438 participants.
- Code of Conduct socialization on 13 February 2019 to local contractors attended by 15 participants.

**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****Land Legality:**

1. PT. Tunggal Mitra Plantation has had land title (HGU) which covered 13,836 Ha operational areas (mill and estates). Those land title valid until 20 July 2034.
2. PT. Tunggal Mitra Plantation has had plantation permit which covered 13,836 Ha plantation areas and mill capacity 45 ton FFB/hour.

**Best Management Practices**

- The company has no more to use paraquat dichlorida since 2016.
- The company has only plnated DxP seeds produced by recognized seeds producers in Indonesia.
- Estate management has conducting zero burning method during land clearing for replanting purposes. Furthermore, water management and subsidency monitoring has adopted on peat areas.
- Estate management has implementing early warning system and integrated pest management.

**Environment**

- The company has Environment Permit as shows in AMDAL which approved by Minister of Agriculture through Decree No. RC. 220/950/B/V/1994 dated 28 May 1994. The AMDAL study has covers area for about 18,000 ha with mill processing capacity for about 60 ton FFB/hour. Furthermore the RKL/RPL of PT TMP has agreed by Administration Department Borad from Ministry of Agriculture through Decree No. 001/RKL-RPL/BA/VI/94 dated 24 June 1994. Later on this RKL/RPL had revised by Environment Impact Control Board (BAPEDALDA) of Rokan Hilir Regency through Decree No. 666.1/AMDAL-BAPEDALDA/2006/12 dated 23 August 2006. Scope of RKL/RPL revision are area for oil palm plantation covers 13,836 ha and its processing unit with capacity 60 ton FFB/hour.
- The company has land application permit as shows through Head of Environment Agency of Rokan Hilir regency Decree No. 49/DLH/2017 dated 04 December 2017, valid for 5 years.
- The company has permitted Hazardous Material Store which shows through Head of BAPEDALDA of Rokan Hilir Regency No. 54/BPDL/2015 dated 27 November 2015, valid for 5 years.

**OSH**

- The company hs provide their workers with PPE as mentioned in HIRAC and MSDS.
- Periodic inspection of processing machinaries has been conducted by PT Putra Teknindo Inspection on March 2019. The inspection report has also signed by Monitoring Officer from Manpower Agency of Riau Province. Certificates of inspection are available.
- Monitoring of machinaries permit is available. All permit were valid until 13 October 2019 to 15 August 2022. Process of permit extension is available, for example as shows through Letter of Industrial Agency of Rokan Hilir Regency No. 510.3/BIDMET/VIII/2019/06 dated 20 August 2019 for Storage Tank Callibration.
- The company has OSH Committee approved by Manpower Agency of Riau Province. The Secretary of committee were licensed OSH Expert.
- The company has monitoring operator licenses and certificates which required by several applicable regulations related to occupational health and safety.
- The company has provide first aid kit within estate and mill operational areas. Furthermore, the workers has also covers by BPJS and Manulife insurance.
- However, it was noted that MGF has lack 3 of Licensed Boiler Operators Class 2 as required by Permenaker No. 01 1998. Furthermore, as the Mill has Generator Set with capacity > 200 kVA, there is no Licensed Electricity Expert (*AK3 Listrik*) in MGF as required by Permenaker No. 12 in 2015. Program of traning on these operators and AK3 Listrik are not available. Thus, raised **NCR No. 2019.01 with Major Category**.

**Worker welfare**

- The company has implemented a minimum wage in the wage system and is in accordance with Regulation of Manpower Ministry No. 07 of 2013 concerning Minimum Wages
- The company has a structure and wage scale for each level of workers and is in accordance with Regulation of

Manpower Ministry No. 01 of 2017 concerning Wage Structure and Scale

- The company has reported regularly the Labor Obligation Report annually and is in accordance with Regulation of Manpower Ministry No. 18 of 2017 concerning Mandatory Reporting of Workers

The company has an updated list of legal requirements as of August 2, 2019, including relevant regulations related to the RSPO and the number of regulations identified as 147 consisting of local, national and international regulations that have been ratified. The list of legal requirements is available in each office of the unit making it easier to access the list. In addition, copies of these legal provisions are always under the supervision of the PSQM Department. Copies of the entire legal requirements are available in softcopy and some legal requirements documents are also in the form of hardcopy.

**2.1.2; 2.1.3; 2.1.4**

The company has a legal requirement mechanism with document No. 701 / TQEM-ESH / 10 which explains that the PIC responsible for identifying and evaluating regulations is PSQM, PSD Department and EHS Department. The company has an updated list of legal requirements as of August 2, 2019, including relevant regulations related to the RSPO and the number of regulations identified as 147 consisting of local, national and international regulations that have been ratified.

All existing legal requirements cover a variety of operational activities in plantations and factories, for example:

- Constitution No. 13 of 2003 concerning Manpower
- Decree of Manpower Ministry No. 100 of 2004 concerning Provisions for Implementing Specific Time Work Agreements
- Regulation of Agriculture Ministry No. 11 of 2015 concerning ISPO that has been carried out by PT Tunggal Mitra Plantation
- Constitution No. 32 of 2009 concerning Environmental Protection and Management
- Constitution No. 34 of 2014 concerning Plantations

The company has a legal requirement mechanism with document No. 701 / TQEM-ESH / 10 which explains that the PIC responsible for identifying and evaluating regulations is PSQM, PSD Department and EHS Department. In addition, there is also an update regarding the frequency of updates in accordance with the development of law in Indonesia once a year. In identifying and inventorying legal requirements, the company does it as follows:

- Regularly contact government agencies and non-governmental organizations to find out the latest regulations that apply both internationally, nationally and locally
- Actively visiting related websites
- Updated every 1 year

The company evaluates legal compliance once a year to ensure company compliance with applicable legal regulations. An evaluation of the compliance with the latest legal regulations was carried out on August 2, 2019 with the result that all 147 regulations have been implemented. In addition, internal compliance audits are conducted in conjunction with ISPO and RSPO internal audits.

<b>2.1.1</b>	<b>Status: Non-Conformity No. 2019.01 indicator Major</b>
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**2.2**  
**The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.**

- 2.2.1**
1. PT. Tunggal Mitra Plantation has had land title (HGU) No. 2 year 1999 which covered 13,836 Ha operational areas (mill and estates). Those land title valid until 20 July 2034.
  2. PT. Tunggal Mitra Plantation has had plantation permit (SPUP) No. 202/Menhutbun – VIII/2000 dated 10 March 2000 which covered 13,836 Ha plantation areas and mill capacity 45 ton FFB/hour.

Following the previous assessment, there is occupied area by local people that lead to excluded from the land title (enclave). There was some process that showed to the auditor during the previous audit such as correspondence between top management of PT. Tunggal Mitra Plantation with National Land Agency. But, there was no positive progress during that time until this surveillance audit. Complete the enclave process so that the operational area matches with the legal

area. OFI

Until this ASA, certificate holder managed 11,363.60 Ha from 13,836 Ha land title. The rest 2,472.40 Ha is now occupy by local communities.

**2.2.2**

PT Tunggal Mitra Plantation has had Standard Operating Procedure regarding to Maintenance of Boundary Poles (Document: PDKK number, valid since July 4, 2010). These procedure as guidance for maintenance periodically the boundary poles. According to the report of boundary poles monitoring, there is 1 official boundary poles and 49 additional in Manggala 1 Estate, 3 official boundary poles and 12 additional in Manggala 2 Estate, 2 official boundary poles and 115 additional in Manggala 3 Estate (last monitored on August 2019) where all the boundary poles is in good condition (eventhough some of them located in occupation area).

**2.2.3, 2.2.4 & 2.2.5**

PT. Tunggal Mitra Plantation has had Procedure of Land Acquisition in Occupation Area (Document Number 343 / PSD-OKUP / 11) signed by Head Plantation Upstream Indonesia dated 22 June 2012.

Based on document verification and stakeholder consultation with village representatives from *Suka Jadi* and *Desa Perkebunan Siarang-arang Rokan* was knew there is no land dispute case between PT Tunggal Mitra Plantation and other party surrounding the plantation area.

**2.2.6**

The company had policy Sime Darby Responsible Agriculture Charter, 2016. These Policy related to Prohibition of Contractually Army using, The main point was explained in these policy, consist of point that the company will not using of Contractually Army in conflict resolution and will not tolerance of anarchism in conflict resolution process.

Based on field visit observation during the audit process and stakeholder consultation with village representatives *Suka Jadi* and *Desa Perkebunan Siarang-arang Rokan*, there is no indication of Contractually Army usage in PT Tunggal Mitra Plantation.

**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; 2.3.2; 2.3.3 and 2.3.4**

PT. Tunggal Mitra Plantation has had Procedure of Land Acquisition in Occupation Area (Document Number 343 / PSD-OKUP / 11) signed by Head Plantation Upstream Indonesia dated 22 June 2012.

Based on document verification of High Conservation Value Identification and Social Impact Assessment of PT Tunggal Mitra Plantation and stakeholder consultation with village representatives from Sukajadi and Perkebunan Siarang-arang known that there was no customary right inside of operational area. During ASA-1.4 audit found no land compensation process. The compensation process has been done in the early period of plantation development. The land acquisition or compensation documentation process was filled in each estate

During the audit, auditor also contacted village representatives of *Suka Jadi* and *Desa Perkebunan Siarang – arang* known that the company did not extend the area and there were no land disputes, so there was no compensation for new land. The auditor has also scheduled a meeting with the previous land owner, but the person concerned cannot be met at the time.

The company has shown the entire compensation process in the previous assessment, for example in 1997, an area of 301.60 hectares in the Tanah Putih sub-district. The compensation documentation is consist of Minutes of Compensation Handover, Statement of Compensation, Proof of receipt of compensation, Statement of land owner, Land Situation Map.

**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**

Long term management plan was arranged by estate and mill unit, issued by Area Controller of Riau Utara (ACRU). The company has longterm management plan for period 2019 to 2023 which already covers projection on FFB production, extraction of product (OER and KER), production of CPO and PK, production cost, revenue, replanting, forecast of product price, gross income, estate operational cost, mill operational cost, other cost, net profit, benefit cost ratio, etc. For example, long term budget for FFB production, CPO production, Kernel Production, CPO price and Kernel price for period 2022 are 220,775 ton; 50,778 ton; 11,039 ton; IDR 7,857.14/kg; and IDR 4,714.29/kg, respectively. Estate and mill management informed that there is no plan extension of estate operational areas and increment of mill processing capacity in the near future, which were about 13,836.00 ha and 60 ton FFB/hour, respectively. Furthermore, it was stated that those longterm business plan mentioned above are subjected to be changed and reviewed annually by the respective management such as Mill or Estate Manager, General Manager (GM), Senior GM (Head Region), Head Plantation Officer (HPO) and Chief Finance Officer (CFO) through considering actual trends and dynamic situation which predicted could be changed in the future. Moreover, it was known that there were no presence of peat areas and smallholder development project. Plantation Service department (PSD) and Plantation Sustainability and Quality Management (PSQM) Department are together with Estate and Mill Management has responsibility to ensure that all technical implementation has in accordance with procedure, which aims to reach optimum output for budget fulfillment purposes through monitoring, training and socialization.

**3.1.2**

Estate management shows replanting program for period 2012 to 2025. For example, replanting program for period 2019 was about 261.61 ha, located on Block 92B017-018; 92C017; 92D014-015; 92F013; and 92G012. Meanwhile, progres of replanting program for period 2017 to 2019 is presented in the following Table:

2017/2018 (Actual)		2019	
Block	Area (ha)	Block	Area (ha)
92D010	66.05	92B017	40.92
92D011	33.42	92B018	62.67
92D012	67.10	92C017	63.49
92D013	26.10	92D014	56.23
92E009	48.78	92D015	46.47
92E010	39.58	92F013	46.39
92F009	41.50	92G012	45.44
92G009	53.60	-	-
<b>Total (ha)</b>	<b>376.00</b>	<b>Total (ha)</b>	<b>261.61</b>

Based on explanation above, it was known that replanting program was proceed inline with longterm replanting schedule. Record of realization were available onsite.

**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**

**Oil Palm Agronomy Procedures**

There were no revision on the current procedure of oil palm agronomy and processing. The company has procedure (SOP) of oil palm Agronomy for Minamas Plantation Group which presented in document of Agricultural Reference Manual Policy No. 110/EST-ARM/13 dated 01 September 2013 which issued by the Head of Plantation Upstream Indonesia. The SOP describes techniques on palm material preparation, nursery, planting and replanting, land preparation, harvesting management, field upkeep, manuring, by-product application (EFB and POME), canopy management, water management and management in peat soil, strandard of ripeness, ablation, palm protections, weeds control, LCC planting and rainfall recording. Based on Agronomy SOP's document reviews, field observation and interview with Foreman, Harvesters and

Loosefruit Picker in all Estates, it could be concluded that the harvesters were able to explain and demonstrate the harvesting process in accordance with SOP, such as ripeness criteria, frond stacking and the use of personal protection equipment (PPE). Furthermore, based on field observation and interview with Foreman and Pesticide Applicators from all estates, it could be concluded that the workers were able to explain and demonstrate its job in accordance with the SOP, such as considering wind flows during spraying process, pesticides and weeds target, prohibited areas to be sprayed (for example conservation area and riparian zone, which were marked with yellow poles and yellow mark on the palm trunks), PPE's to be used as well as its management.

#### **Oil Palm Processing Procedure**

Procedure for oil palm processing from FFB acceptance to dispatch of CPO and PK were presented in document of Minamas Plantation palm oil mill guidelines Part I and Part II, policy No. 130/POD-FAC/07 and No. 110/POD-FAC/07 Chapter I, Sub-chapter 1.1 which describes POM technical guidelines, such as stations processing, stocking, waste control and management, water treatment and laboratory analysis. There were also another policies related with oil palm processing, for example: Policy No. 14x/PTK-TRP/2004, No. SOP-SLF-01/2010 and No. 721/TQEM-PKA/08 Sub-chapter 6.2 which describes about FFB transportation, FFB acceptance and FFB grading on the mill, respectively. Based on field observation to all processing station in Manggala Factory (MGF), it could be concluded that all processing activities has satisfactory implemented in accordance with the procedures.

#### **Safety Aspect Procedure**

Safe working practices for mill is already mentioned in the Mill procedures such as Minamas Plantation palm oil mill guidelines Part I and Part II, Policy No. 130/POD-FAC/07 and No. 110/POD-FAC/07. According to field observation to estate and mill, as well as interview with the respective workers, it could be concluded that in general the workers has understood the basic of safe working practices such as using a set of personal protection equipment (PPE), meaning of risk symbols, agrochemicals and hazardous materials handling, etc. furthermore, procedure of specific safe working practices towards pesticides application is presented in the following documents:

- No. LF/SOP.ESH/04 dated 11 January 2011 about agrochemicals handling.
- ARM Policy No. 110/EST-ARM/13 Chapter 15 dated 01 September 2013 about plant protection.
- Material Safety Data Sheet (MSDS) of pesticide products.
- Hazard Identification Risk Assessment Control (HIRAC).

Based on procedure documents review, it could be concluded that the oil palm agronomy, processing and safety procedures are still relevant with current situation and covers all main aspects from the field to the mill. All procedures are available in Bahasa. Furthermore, based on observation to estate and mill office, it was known that all procedures were available, as well distributed by PSQM officers.

#### **4.1.2**

Update and procedure documents distribution control to the respective units of PT TMP were conducted by Group Sustainability Quality management (GSQM) - Sustainability. For monitoring and consistency purposes of procedure implementation, some mechanism had been carried out by Minamas management, which presented in several documents, for example as follows:

- Monthly Estate/Mill Manager reports which presented in Mill Manager Process Control report, Estate Performance Index and Management Committee Meeting. All unit management are able to shows Manager reports for period January to July 2019.
- Estate Performance Index period 2018/2019 by Head of Plantation Operation which describes several work quality such as harvesting, extraction rates, product quality, field upkeep quality, etc.
- Annual RSPO internal audit by GSQM-Sustainability Department had conducted in 20-28 May 2019. Internal audit mentioned that there were 4 major and 3 minor of P&C; and 3 NCR on SCCS findings which all were fully complied by PT TMP on 20 August 2019. The results was signed by Head of Sustainability and all Managers of PT TMP.
- Semester performance qualitative report by Head Office team.
- Annual Plantation Advisory Visit report by Plantation Advisory Department from Head Office in Malaysia. For example, advisory visit in MGE-3 has conducted on 12-15 January 2019, presented in document No. MGE3/SOU16/1-19 MGE-2. Meanwhile, plantation advisor in MGE-2 has conducted on 17-19 June 2019, presented in document No. MGE-2/SOU16/1-19. Rating performance of MGE-3 and MGE-2 were 84.50 and 87.98 %, respectively, which both were classified as Good category. Report has describes summaries and mentioned critical

point(s) found and noted during advisory audit. All findings were need to be response and follow up by the respective Manager through action plan and time frame, immediately. Progress were reported directly by Manager to the respective Advisor(s) and upper ordinate or authority (Head Office Management). Field verification and evaluation later on to be conducted by the Advisor(s) on the coming assessment.

Observation results has documented and delivered via online to head office management for personal performance scoring purposes.

Furthermore, performance of contractor has been conducted through some other ways, for example as follows:

- Regarding technical matters, there were Official Report of Working Progress Monitoring or Checking.
- Regarding Safety matters, there were daily monitoring that conducted by Foreman.

**4.1.3**

Estates and mill management operational activities has monitored, documented and regularly reported, for example as follows:

- Production report by Assisstant GSQM which describes FFB received, FFB processed, CPO and PK production, bulking and its stock in storage and bulking for RSPO certified.
- Monthly Mill Manager report which describes general data, production quality, production loss, FFB quality, EFB and POME application, delivery, losses analysis, production cost, manpower, etc.
- Monthly and semester FFB production report which describes production per Block, rotation, bunch weight, etc.
- Manuring report which describes program vs actual fertilizers application.
- Daily harvesting notes and Foreman notes which informed date of harvesting, harvester name, block location of harvesting, rotation, FFB number and volume.
- Daily work plan which informed type of works, location, number of manpower and other remarks.

The above records or report has informed raw data, analysis and mentioned summary notes. Furthermore, Estate and Mill operational records has also recorded on program namely System Application Product and Processing (SAP) which updated on daily basis. All critical parameter points describes were need to be response and follow up by the respective PIC through action plan immediately. Progress of action plan were reported and submitted directly to the upper ordinate. Later on, each (priority) points were discussed, analysed and presented in monthly meeting by Manager. For example, critical issues and evaluation identified during plantation advisory on MGE-2 regarding yield improvement is preented as follows:

- To minimize recovery losses (partial left-overs upon exicion, stalk trimming with loosefruit removed, unretrieved bunches in drains, incomplete loosefruits from circles and platforms.
- Improving canpy management.
- Enhancing field upkeep, with compete eradication of obnoxious weeds.
- The target is achievable if shortcomings and inefficiencies are sufficiently addressed.

**4.1.4**

Manggala Factory (MGF) has only receive FFB from its own estates and has no cooperation of FFB delivery with other Minamas Group companies, other companies, as well as with smallholders. The CH has implementing Integrated Preserved Supply Chain Certification System.

**Status: Comply**

**4.2**

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

**4.2.1**

Procedure (SOP) of soil fertility management is presented in document policy No. 110/EST-ARM/13 Part 8 about manuring. The SOP mentioned that manuring recommendation must be based on leaf and soil sampling analysis. Leaf sampling and soil sampling analysis should be carried out once and every five years, respectively. Both analysis has carried out by Minamas Research Centre (MRC) in Pekanbaru, Riau. Parameter measured on leaf analysis are macronutrient (N, P, K, Ca, Mg and Mn) and micronutrient (Fe, B, Zn and Cu) content (in %) while in soil analysis are nutrient retention (pH, % Organic-C, CEC), available nutrient (N-total, P-Total, available-P, K-dd and Mg-dd), soil



properties (texture, drainage class, rooting depth), etc. Visual assessment of palm vigour land field condition by Agronomist was also carried out every 6 months to monitoring nutrient status change. Records of leaf and soil sampling are available. According to manuring recommendation program in 2018/2019 and 2019/2020, it could be concluded that calculation of fertilizer rates were derived from leaf and soil analysis. Furthermore, actual time of application has follows the schedule recommended by MRC Agronomist team.

As mentioned in Indicator 4.1.2 and 4.1.3 it was informed that monitoring on procedure application were carried out by PSQM Department and Plantation Advisory visit. Based on field observation to all Estates, it was found several strategy had implemented which aims to enhance soil fertility in both areas such as:

- Manuring as recommended by Agronomist team. Based on observation to manuring activities in Division 3 Block E011MGE-1, Division 2 Block F004 MGE-2 and Division 2 Block L014 MGE-3, it was known that the workers were able to explained and demonstrate technical matters in fertilizer application such as dosage, placement, time of application, prohibited areas to be applied, as well as PPE to be used. Record of fertilizer application were available on estate site.
- By-products application, for example as seen in Division 4 Block B013 MGE-1 and Division 4 Block C002 MGE-2 for empty fruit bunch (EFB) mulching; and in Division 3 Block E011 MGE-1 for land application by palm oil mill effluent (POME).
- Planting of legume cover crops (LCC) such as *Mucuna bracteata* and maintaining soft grasses on immature and terraces areas as seen in replanting areas in all estates. This legumes has used to enhance nutrient N and K content on the soils, at the same time could prevent soil erosion.
- To keep soil moisture through selective weeding, by-products application and LCC maintenance.

#### 4.2.2

Estate management has monitor the used of fertilizers and satisfactory recorded on Manuring Recapitulation and monthly Estate Manager Report. Manuring record for period 2018 and 2019 in all estates were available. Records of fertilizer applied has also presented in monthly management committee meeting (MCM) which prepared by Estate Manager. The report has informed Block of application, type and volume of fertilizer applied. Fertilizer recommended in 2018 to 2019 are HGFB, ZnSO<sub>4</sub>, CuSO<sub>4</sub>, ZA, RP, MOP and NPK44. Based on document review, it was informed that manuring recommendation for period 2018 is fully completed and application for 2019 was inline with the schedule. For example, fertilizer usage per ton FFB produced during 2018 for HGFB, ZnSO<sub>4</sub>, CuSO<sub>4</sub>, ZA, RP and MOP are 0.90; 0.53; 0.53; 13.40; 11.55 and 18.89 kg/ton FFB, respectively. Moreover, based on interview with manuring Foreman and fertilizer applicators from all estates, it was stated that applicators has trained periodically by Foreman and Assistant Manager. Object of training were fertilizer placement, time of application, correct dosage, PPE used and areas where fertilizer is prohibited to be applied such as riparian, HCV, abnormal palms, etc.

#### 4.2.3

Procedure of soil fertility management was presented in document policy No. 110/EST-ARM/13 Part 8 about manuring. SOP mentioned that manuring recommendation must be based on leaf and soil sampling analysis. Leaf sampling and soil sampling analysis should be carried out once and every five years, respectively. Both analysis has carried out by MRC in Pekanbaru, Riau. Leaf and soil sampling were not conducted on the projected replanting areas (about 2 years before replanting). Parameter measured on leaf analysis are macronutrient (N, P, K, Ca, Mg and Mn) and micronutrient (Fe, B, Zn and Cu) content (in %) while in soil analysis are nutrient retention (pH, % Organic-C, CEC), available nutrient (N-total, P-Total, available-P, K-dd and Mg-dd), soil properties (texture, drainage class, rooting depth), etc. Visual assessment of palm vigour land field condition by Agronomist was also carried out every 6 months to monitoring nutrient status change. Records of leaf and soil sampling are available. According to manuring recommendation program in 2018/20189 it could be concluded that calculation of fertilizer rates were derived from leaf and soil analysis. Furthermore, actual time of application has follows the schedule recommended by MRC Agronomist team.

Estates management are able to shows leaf sampling analysis. For example, leaf analysis for MGE-1, MGE-2 and MGE-3 are presented in document Test Report No. P46/2019 dated 07 May 2019; No. P48/2019 dated 11 May 2019; and No. P116/2019 dated 26 July 2019, respectively. There LSU results has also informed in MRC Head Letter No. MRC/Mgr.P&PN/Mgr.Lab/004/IV/2019 dated 05 April 2019. Furthermore, soil sampling analysis is presented in document of semi detail soil survey report of PT TMP period 2015 to 2020 dated April 2016 which carried out by MRC team from Pekanbaru. As mentioned in Indicator 4.1.2 and 4.1.3 it was informed that monitoring on procedure application were carried out by GSQM Department and Plantation Advisory visit. Based on field observation to all sampled Estates, it was

found several strategy had implemented which aims to enhance soil fertility in both areas, such as: manuring as recommended by Agronomist, by product application (EFB in all estates and land application in MGE-1), proper planting of legume cover crops (LCC) such as *Mucuna bracteata* and maintaining soft grasses on immature and terraces areas. This legumes has used to enhance nutrient N and K content on the soils, at the same time could prevent soil erosion. Futhermore, for keeping soil moisture on the field purposes, esttae management has conducting selective weeding, by-products application and LCC maintenance.

**4.2.4**

Apart from chemical fertilizers, organic fertilizers which came from by-products (EFB and palm oil mill effluent) has also applied for nutrient cycle purposes. By-products application was documented in monthly Estate Manager report chapter monthly work realization, realization of manuring report and by-product realization report. EFB dosage recommended were varies about 150 to 200 kg/palm/year in replanting areas and about 250-300 kg/palm/year in mature areas, which depends on field condition. Furthermore, POME applied were about 700-750 m<sup>3</sup>/ha/year which devided into 3 rotation. For example, based on field visit to immature area in Division 4 Block B013 MGE-1 and Division 4 Block C002 MGE-2, it was found that EFB were mulched on palm circle with pattern 30 cm from palm base, 2 circle and 1 layer. Furthermore, based on observation to land application area in Division 3 Block E011 MGE-1, it was known that that there was no leaking of POME pipe and applied on the permitted Block as crosschecked on the land application permit. According to land application data, it was known that as per April to June 2019, POME has been applied in MGE-1 totalling for about 7,081 mt; 6,789 mt; and 8,936 mt, respectively. which covers about 17.41 ha; 16.70; and 21.98 ha, respectively. Moreover, as observed to replanting area is conducted in Division 4 Block E001 and Block C002 Manggala 2 Estate which planted in 2018, it was known that there no indication of burning-related activities. Thus, it was indicates that palm residues were lays on the field. This matters has consider as nutrient cycle on the field.

Status: Comply

**4.3**

**Practices minimize and control erosion and degradation of soils.**

**4.3.1**

Information on fragile soils in PT TMP is derived from Soil Survey Report, which conducted by Param Agricultural Soil Survey, Sdn. Bhd. in November 2008 and Semi Detail Soil Survey Report of PT TMP for period 2015-2020 dated 08 January 2016, which conducted by PT Anugerah Sumber Makmur (MRC). Soil map provided in the reports were available in scale 1:25,000 to 1:50,000. According to the report, it was known that there are peat soils with various decomposition levels which totalling covers about 38.16 %, and identified as currently not suitable or fragile area for oil palm cultivation. Meanwhile, about 61.84 % were classified as marginal (S3), while the rest was classified as currently not suitable or fragile area. Main limitation on the soil for oil palm cultivation is mostly due to presence of peat soil and very low fertility soils, drainage problem (water availability) and erosion matters.

**4.3.2**

According to soil survey report, it could be concluded that about 61.21 % of slope condition in PT TMP are dominantly flat, while the rest were varied from undulating to rolling. However, the former slope were mostly covered by peat soil which also has drainage problem with some prone to flood area spotted. Based on field observation, there is also presence of rolling to hilly area which required terraces planting pattern, for example as could be seen on replanting areas in Division 3 Block D013 and Division 4 Block B018 SME-1. In order to overcome limitation due to slope condition, estate management has implementing several strategy such as as follows:

- Adoption of individual planting platform and/or terraces planting pattern on rolling to hilly areas.
- To suppress surface run-off and leaching through U-shape and parallel to the contour line pruned fronds placement on flat to undulating and hilly contour areas, respectively.
- Adoption of field drains with pattern 1:4 on flat lowlying prone flood area.
- Measuring erosion rate on hilly area.
- Selective weeding which aims to enhance organic matter and retaining soil moisture.
- Soil texture and nutrient recovery through by-products (EFB and POME) application.
- Manuring management through leaf and soil nutrient analysis, which recommended by Agronomist from MRC team towards nutrient balance calculation method, maximizing fertilizer use efficiency (to choose suitable fertilizers type, time of application and placement).
- For soil and water conservation, planting of land cover crop such as *Mucuna bracteata* has already implemented on

immature areas.

#### **4.3.3**

Program of road maintenance has found on annual budget plan which is included on Budget of transportation cost and reported on Manager Monthly Management Committee Meeting. Road maintenance activities consist of manual maintenance such as cover crop clearance, surface reparation through gravels, road grader and compaction. For example, up to July 2019, it was known that Manggala Estates has conducting road maintenance totalling for about 354,000 m with total cost for about IDR 888,799,331. Road maintenance map were available. However, based on field observation, it was known that several lowlying areas were prone to flood. To overcome this situation, estate management has adopting field drain installation with pattern 1:4 to accelerate time of water flux, thus FFB transportation could be carried out immediately to prevent overripe fruits on the field. In general, road conditions were satisfactory and easily passable by FFB, CPO and PK transporter unit (oil tank and dump-truck).

#### **4.3.4**

Procedure on peat management has presented in document ARM Minamas Plantation Chapter 10 which mentioned that in order to minimize peat subsidence and peat overdrain, water level management on 50-70 cm, water table monitoring through piezometer, peat subsidence poles monitoring, watergate installation and drains or canals desilting were compulsory to be conducted. Estate management is able to show record on water table monitoring which conducted every week which recapitulate in monthly basis. For example, piezometer measurement in MGE-1 is conducted in 17 points, located in Field G005-G008; F006-F007; E006-E007; D006; C006 and C010; B004, B006 and B010; A009 and A019. Furthermore, monitoring of peat subsidence in Division 2 Block G007MGE-1 from March 2015 to March 2019 were ranged from 1.70 to 0.45 cm/year. As observed to the field, it was known that average of subsidence rate in this particular block was 2.25 cm/year. Monitoring point of peat management in PT TMP has also refers to Map of "*Rencana Kerja Lapangan Rencana Tindakan Tahunan Restorasi gambut tahun 2020, KHG Batang Rokan Kiri – Batang Sosa dan KHG Sungai Bangko – Sungai Rokan Kanan, Kabupaten Rokan Hilir dan Rokan Hulu Provinsi Riau*" from Peat Restoration Board with scale 1 : 100,000.

#### **4.3.5**

Drainability study of PT TMP is conducted by MRC on 2017, which resulting that the PT TMP area is not critical on drainage matters for replanting purposes. Monitoring of water level and water table, as well as peat subsidence rates in the current management input is considered satisfactory and in accordance with applicable regulations in Indonesia. Several recommendation given by agronomist is presented as follows:

- To set up a well planned water management system.
- Water gate and/or dam shall be build up on the strategic area(s), for water level and water table maintenance management control.
- Monitoring of water level shall be conducted periodically to avoid water excess or deficit on the field.
- Training for PIC of water management.

#### **4.3.6**

As mentioned in Indicator 4.3.1 and 4.3.2, it was known that about 38.16 % of PT TMP is identified as currently not suitable (N1) or fragile area. This is due to the presence of peat soils with various decomposition levels. Main limitation on the soil for oil palm cultivation is mostly due to presence of peat soil and very low fertility soils, drainage problem (water availability) and erosion matters. To overcome soil limitations, estate management has implementing several strategy such as follows:

- Adoption of proper water management included water table and peat subsidence rates monitoring.
- Adoption of individual planting platform and/or terraces planting pattern on rolling to hilly areas.
- To suppress surface run-off and leaching through U-shape and parallel to the contour line pruned fronds placement on flat to undulating and hilly contour areas, respectively.
- Adoption of field drains with pattern 1:4 on flat lowlying prone flood area.
- Measuring erosion rate on hilly area.
- Selective weeding which aims to enhance organic matter and retaining soil moisture.
- Soil texture and nutrient recovery through by-products (EFB and POME) application.
- Manuring management through leaf and soil nutrient analysis, which recommended by Agronomist from MRC team towards nutrient balance calculation method, maximizing fertilizer use efficiency (to choose suitable fertilizers type,

time of application and placement).

- For soil and water conservation, planting of land cover crop such as *Mucuna bracteata* has already implemented on immature areas.

Those strategy mentioned above are verified during field observation to all Manggala Estates, and considered satisfactory.

**Status: Comply**

**4.4**

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

**4.4.1**

The company has identify water source as refers to RKL/RPL (AMDAL) in 2006 report and HCV report in 2009, which consist of upstream and downstream of Bangko River and wells used for domestic consumption. Among strategy which already consistently implemented is presented as follows:

- Process of effluent on MGF before released to the field through land application.
- Monitoring of effluent quality, with parameter tested are pH, BOD, COD, TSS, Cd, Pb, Cu, Zn, oil and fat and Total N.
- Monitoring of water quality in upstream and downstream of Bangko River, as well as riparian management with zanation on 50 m range.
- Monitoring of Wells located in land appication area, non land application areas and housing areas.
- Water quality monitoring has refers to KepmenLH No. 28 in 2003; PP No. 82 in 2001; and Permenkes No. 32 in 2017.
- To conduct peat management such as monitoring of water level, water table and peat subsidency.

Based on RKL/RPL Semester I 2019 report dated 14 August 2019, it was known that all Matrix related to water source management and its evaluation has satisfactory conducted by company management.

**4.4.2**

Map of water bodies as wetland is derived from HCV report in 2010 with scale 1 : 50,000. Meanwhile, procedure of water sources is presented in document No. RSPO/4.4/WM 2011. Estates management are able to shows several activities related to riparian zone management of Bangko River, for example as follows:

- Planting of 27 trees of *Pterocarpus indicus* (Angsana) in MGE-1 has been carried out on July 2019.
- Planting of 18 trees of *Pterocarpus indicus* and 32 trees of *Talipariti tiliaceum* or *Hibiscus tiliaceus* (Waru) in MGE-2 has been carried out in April 2019. Furthermore, planting of 38 trees of Bintaro in MGE-2 has been carried out on July 2019.
- Monitoring results of water quality measurements in upstream and downstream of Bangko River for several parameters such as BOD<sub>5</sub>, TSS, DO and minerals (ex. Pb, Co, Cd and Fe) in Semester I period 2019 were bellows threshold as required by Govt. Regulation (PP) No. 82 in 2001.
- Monitoring monitoring wells on land application (LA) area, non-LA area and housing complexand communities areas for several parameters such as BOD<sub>5</sub>, COD, DO, NO<sub>3</sub>, SO<sub>4</sub>, Cl, Pb, Cu, Cd, Zn and pH in Semester I period 2019 were bellows threshold as required by Minister of Health Regulation (Permenkes) No. 32 in 2017.

Based on observation to riparian zone of Bangko River in Division 4 Block A019 MGE-1, it was known that the riparian has satisfactory maintained by estate management on radius 50 m from water bodies. There is no marks of agrochemicals application. Furthermore, based on interview with fertilizer and pesticide applicators in all estates, it was explained that application of agrochemicals on riparian zone is strictly prohibited. Riparian areas were about 50 m from water bodies and marked by yellow paint on the palm trunks. Moreover, signboard installed has informed prohibition of agrochemicals application. Riparian of Bangko River has setted as HCV area.

**4.4.3**

MGF has 11 effluent ponds installation (WWTP) which aims to process mill effluent before released for land application as meet the standard required by Minister of Environment Decree (KepmenLH) No. 28 in 2003. PT TMP has land application permit for area covers 199.00 ha, located in MGE-1 and MGE-3, as shows through Head of Environment Agency of Rokan Hilir regency Decree No. 49/DLH/2017 dated 04 December 2017. The permit is valid for 5 years. Monitoring of effluent quality has regularly conducted every month by accredited Environment Board of Riau Province, which the results has presented and reported in Semester RKL/RPL document. For example, results from January to June 2019 for parameter pH, BOD and COD are all bellows the threshold limit as required by applicable regultion in Indonesia.



Furthermore, based on observation to land application area in Division 3 Block E011 MGE-1, it was known that that there was no leaking of POME pipe and applied on the permitted Block as crosschecked on the land application permit.

**4.4.4**

The company has 4 flowmeters which used to measure water volume on raw water before processed, water consumption for domestical purposes in staff and workers housing, and for Boiler. Currently, water housing for workers areas were supplied from ground water. However, the flowmeters are still properly functioned. Water consumption for FFB process for period 2018 to July 2019 is available on site. According to the records, it could be concluded that in average, MGF had reduced water efficiency for FFB processing from 2018 to 2019 for about 3.08 %. However in both periods, ratio of water usage for FFB processing was bellows the budget as setted by MGF management at 1.35 m<sup>3</sup>/ton FFB.

**Status: Comply**

**4.5**

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

**4.5.1**

The company has committed to implement integrated pest management (IPM) which presented in procedure of ARM Policy No. 110/EST-ARM/13 Chapter 15 about plant protection which covers early warning system, census and analysis, biological and chemical pest population management and monitoring. The estate management has a program of integrated pest management and its realization which presented in monthly committee meeting report, for example as follows:

**Census and Analysis**

Estates menegement are able to shows census results for leaf eating caterpillar (LEC) as currently the only main threat of pest within Manggala Estates operational areas. As per early warning system for example FFB quality on platform, it was known that rats attack is considered very low. Furthermore, as observed to the field in MGE-1, MGE-2 and MGE-3, it was known that visually symptomp of rats, termites and rhinobeetle incidence were considered very low. For example, LEC census in MGE-1 and MGE-2 is presented as follows:

- As per census result dated 05 July 2019 and 29 July 2019, it was detected that LEC attack with average 9.82 LEC/frond were spotted in Division 1 Block A009 and B007 MGE-1. Thus, chemical control through trunk injection by 34.60 lt of "Capture" is recommended and applied on the following days. As per monitoring census for 14 days after application, the results shows that LEC incidence in both Blocks were bellows threshold limits (null).
- As per census result dated 10-16 June 2019, it was detected that LEC attack with average more than 20 LEC/frond were spotted in Division 4 Block A001; B001-B004; and C004 MGE-2. Thus, chemical control through trunk injection by 37.50 lt of "Acephate" with dosage 15 gr/palm is recommended and applied on the following days. As per monitoring census for 14 days after application, the results shows that LEC incidence in both Blocks were bellows threshold limits (null).

**Biological Method for Pest Population Control**

- The CH has conducting beneficial plants for leaf eating caterpillar and bagworm population control. New planting of beneficial plants has confirmed during field observation along main road and collection road, especially on replanting areas.
- The CH has adopting barn owl (*Tyto alba*) for rat population control. Estate management mentioned that 1 BOB was projected to covers about 20 to 30 ha. For example, based on observation to BOB in Division 2 Block E010 and Division 3 Block D013 MGE-1, as well as in Division 4 Block E001 MGE-2, it was found presence of *Tyto alba* which marked through rat bones.

In order to avoid P&D (include weeds) resistance and prophylactic uses of pesticide, estate management had substitute and/or rotate the use of pesticides for the same target, for example, in term of broad leaf control such as *Ageratum conyzoides*, *Boreiva alata* and *Mikania micranta*, the use of Kenlly 20 WG (Methyl metsulfuron) could be substitute with Ken Up 480 SL (Isoprophyl amine glyphosate). Moreover, biological control has also adopted as mentioned above.

**4.5.2**

The CH has conducting several trainings which aims to maintain workers knowledge and skills towards P&D management, for example as follows:

- Training of pest incidence census has conducted on 11 February 2019, attended by all census officers from the respective estates.
- Training and socialization of BSS, MSDS and HIRAC for Agrochemicals Applicators has conducted on 08 April 2019. The

training is given by MRC Assistant, attended by all Agrochemical Applicators. Material of training, picture documentation, and attendance list were available.

Based on field observation and interview with Foreman and pesticide applicators from all estates, it could be concluded that the workers were able to explain and demonstrate its job in accordance with the SOP, such as justification of pesticide usage, considering wind flows during spraying, pesticide mixing, pesticides and its target, prohibited areas to be sprayed (for example conservation area and riparian zone, which were marked with yellow poles and/or yellow mark on the palm trunks) as well as PPE's to be used as well as its management. Pesticide applicators has also mentioned that pregnant and breastfeeding women are strictly prohibited to works related with agrochemicals.

Status: Comply

#### 4.6

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

##### 4.6.1

Procedure ARM Policy No. 110/EST-ARM/13 Chapter 15 about plant protection mentioned that the use of agrochemical should be based on census analysis evaluation when the level of incidence is more than threshold limits. In order to avoid P&D (include weeds) resistance and prophylactic uses of pesticide, estate management had substitute and/or rotate the use of pesticides for the same target, for example, in term of broad leaf control such as *Ageratum conyzoides*, *Boreiva alata* and *Mikania micranta*, the use of Kenlly 20 WG (Methyl metsulfuron) could be substitute with Ken Up 480 SL (Isoprophyl amine glyphosate). Moreover, biological control has also adopted.

According to observation to agrochemicals warehouse and record of pesticide application, list of pesticide used in 2018/2019 for PT TMP is presented as follows:

Pesticides	Active Substance	Target
<b>Herbicides</b>		
Kenlly 20 WG	<i>Methyl Metsulfuron</i>	Broadleaf
Ken Up 486 SL	<i>Isoprophyl Amine Glyphosate</i>	Broadleaf and narrowleaf
Kenlon 480 EC	<i>Triklopir Butoksi Ethyl Ester</i>	Broadleaf and narrowleaf
Lifeline 280 SL	<i>Ammonium Glufosinat</i>	Broadleaf and narrowleaf
Basta 150 SL	<i>Ammonium Glufosinat</i>	Broadleaf and narrowleaf
<b>Insecticide</b>		
Capture 50 EC	<i>Cipermethrin</i>	Leaf eating caterpillar
Kencepat 75 SP	<i>Acephate</i>	Leaf eating caterpillar

Those pesticides mentioned above were listed in Pesticide and Fertilizer Directorate through [http://pestisida.id/simpes\\_app/rekap\\_formula\\_nama.php?s\\_kategori=umum](http://pestisida.id/simpes_app/rekap_formula_nama.php?s_kategori=umum). Furthermore, according to pesticide used record in 2018/2019 and observation to Pesticide Store in all estates, it was known that there is no paraquat on the stock.

Based on field observation and interview with Foreman and Pesticide Applicators in Division 4 Block G32/33 MGE-1 and Division 3 Block C005 MGE-2, it could be concluded that the workers were able to explain and demonstrate its job in accordance with the SOP, such as justification of pesticide usage, considering wind flows during spraying, pesticide mixing, pesticides and its target, prohibited areas to be sprayed (ex. Riparian and HCV area), PPE's to be used and its management. Pesticide applicators has also mentioned that pregnant and breastfeeding women are strictly prohibited to works related with agrochemicals.

##### 4.6.2

Record of pesticide usage in all estate were available and presented in Estate manager report. For example, up to May 2019, record of pesticide usage which presented in volume of active substance (kg or litre) per hectare in Manggala Estates is summarized in the following Table:

Pesticide	LD-50	MGE-1	MGE-2	MGE-3
Ken Up 486 SL	LD <sub>50</sub> ORAL: 1,480 mg/kg in Rats LD <sub>50</sub> DERMAL: 2,000 mg/kg in Rabbits	0.105	0.035	0.451
Kenlon 480 EC	LD <sub>50</sub> ORAL: 1,480 mg/kg in Rats	0.082	0.204	0.018

	LD <sub>50</sub> DERMAL: 2,000 mg/kg in Rabbits			
Lifeline 280 SL	LD <sub>50</sub> ORAL: 1,480 mg/kg in Rats LD <sub>50</sub> DERMAL: 2,000 mg/kg in Rabbits	0.073	1.064	0.060
Kenly 20 WG	LD <sub>50</sub> ORAL: 5,000 mg/kg in Rats LD <sub>50</sub> DERMAL: 2,000 mg/kg in Rabbits	0.001	0.002	0.001
Capture 50 EC	LD <sub>50</sub> ORAL = 1,800 mg/kg in Rats LD <sub>50</sub> DERMAL = 2,000 mg/kg in Rats	0.027	0.030	0.018
Kencepat 75 SP	LD <sub>50</sub> ORAL = 1,800 mg/kg in Rats LD <sub>50</sub> DERMAL = 2,000 mg/kg in Rats	0.014	0.025	0.030

According to the Table above, it was known that monitoring of pesticides usage per application areas (in ha) is properly maintained by estate management.

#### 4.6.3

Program and realization of pest management was presented in monthly report which describes EWS and census analysis, biological control and pesticide application, for example as follows:

##### Census and Analysis

Estate management are able to show census results for leaf eating caterpillar (LEC) as currently the only main threat of pest within Manggala Estates operational areas. As per early warning system for example FFB quality on platform, it was known that rats attack is considered very low. Furthermore, as observed to the field in MGE-1, MGE-2 and MGE-3, it was known that visually symptoms of rats, termites and rhinobeele incidence were considered very low. For example, LEC census in MGE-1 and MGE-2 is presented as follows:

- As per census result dated 05 July 2019 and 29 July 2019, it was detected that LEC attack with average 9.82 LEC/frond were spotted in Division 1 Block A009 and B007 MGE-1. Thus, chemical control through trunk injection by 34.60 lt of "Capture" is recommended and applied on the following days. As per monitoring census for 14 days after application, the results shows that LEC incidence in both Blocks were belows threshold limits (null).
- As per census result dated 10-16 June 2019, it was detected that LEC attack with average more than 20 LEC/frond were spotted in Division 4 Block A001; B001-B004; and C004 MGE-2. Thus, chemical control through trunk injection by 37.50 lt of "Acephate" with dosage 15 gr/palm is recommended and applied on the following days. As per monitoring census for 14 days after application, the results shows that LEC incidence in both Blocks were belows threshold limits (null).

##### Biological Method for Pest Population Control

- The CH has conducting beneficial plants for leaf eating caterpillar and bagworm population control. New planting of beneficial plants has confirmed during field observation along main road and collection road, especially on replanting areas.
- The CH has adopting barn owl (*Tyto alba*) for rat population control. Estate management mentioned that 1 BOB was projected to covers about 20 to 30 ha. For example, based on observation to BOB in Division 2 Block E010 and Division 3 Block D013 MGE-1, as well as in Division 4 Block E001 MGE-2, it was found presence of *Tyto alba* which marked through rat bones.

In order to avoid P&D (include weeds) resistance and prophylactic uses of pesticide, estate management had substitute and/or rotate the use of pesticides for the same target, for example, in term of broad leaf control such as *Ageratum conyzoides*, *Boreiva alata* and *Mikania micranta*, the use of Kenly 20 WG (Methyl metsulfuron) could be substitute with Ken Up 480 SL (Isoprophyl amine glyphosate). Moreover, biological control has also adopted as mentioned above.

#### 4.6.4

The company has list of pesticides included on WHO Class 1A and 1B and/or listed on Stockholm or Rotterdam is presented in company Policy No. 724/TQEM-SPMS/09 dated 27 August 2010. Meanwhile, company commitment on zero use of those pesticides is presented in "Sime Darby Responsible Agriculture Charter" dated September 2016. Based on pesticide used records in 2018/2019 for PT TMP which presented in Indicator 4.6.1 and 4.6.2, it could be concluded that there is no pesticides listed in WHO Appendix 1A, 1B and/or listed in Stockholm or Rotterdam Convention as well as paraquat. Moreover, all pesticides used by PT TMP were listed on www.pestisida.id by Department of Agriculture, Republic of Indonesia.

#### 4.6.5

Procedure of pesticide handling, use and application were presented in several documents, such as document No. LF/SOP.ESH/04 dated 11 January 2011 about agrochemicals handling, document No. 394/IT-LB3-23/11 dated 27 September 2011, ARM Policy No. 110/EST-ARM/13 Chapter 15 dated 01 September 2013 about plant protection, Material Safety Data Sheet (MSDS) of pesticide products and Hazard Identification Risk Assessment Control (HIRAC) for estate. In general, procedures has covers guideline of storage and handling of pesticides, handling of accident and first aid, risk identification, pesticides spills and leaks handling, PPE, physical and chemical properties, reactivity and material stability, toxicology and ecology information, pesticide wastes handling and transportation.

The Company has conducting several trainings which aims to maintain workers knowledge and skills towards pest and diseases management, for example as follows:

- Training of pest incidence census has conducted on 11 February 2019, attended by all census officers from the respective estates.
- Training and socialization of BSS, MSDS and HIRAC for Agrochemicals Applicators has conducted on 08 April 2019. The training is given by MRC Assistant, attended by all Agrochemical Applicators. Material of training, picture documentation, and attendance list were available.

According to document verification, statement from estate manager, interview with pesticide applicators and field observation to agrochemicals warehouse, it could be concluded that the company has no use of pesticides which required a special training for its applicators (ex. Paraquat) as arranged by Ministry of Agriculture Regulation (Permentan) No. 24 year 2011. Furthermore, based on field observation and interview with pesticide applicators Division 4 Block G32/33 MGE-1 and Division 3 Block C005 MGE-2, it could be concluded that the workers were able to explained and demonstrate several technical skills such as PPE used, spraying techniques and prohibited application areas such as HCV and riparian areas which marked with yellow paint on palm trunks or yellow poles. Moreover, based on field observation to Pesticides Store in all Estates, it was found that all MSDS were available and match with pesticide stocks, symbols of risk and hazardous level, instruction and PPE used were displayed properly. There are block spraying system (BSS) House as pesticide mixing and PPE's place which available in all estates.

#### **4.6.6**

Procedure of pesticide storage is presented in document No. RA012 (Rev. 01) dated 21 February 2018. Furthermore, work instruction on pesticide application has follows technique presented in Material Safety Data Sheet (MSDS) of pesticide products and Hazard Identification Risk Assessment Control (HIRAC) for estate. Which covers guideline of storage and handling of pesticides, handling of accident and first aid, risk identification, pesticides spills and leaks handling, PPE, physical and chemical properties, reactivity and material stability, toxicology and ecology information, pesticide wastes handling and transportation. Training and socialization of BSS, MSDS and HIRAC for Agrochemicals Fertilizer Applicators has conducted on 08 April 2019. The training is given by MRC Assistant, attended by all Agrochemical Applicators. Material of training, picture documentation, and attendance list were available.

Estate management mentioned that used pesticide containers could be reused for the same purposed such as for mixing containers, or to be delivered to Hazardous Waste Store which will be collected by permitted collector namely CV Amindy Barokah. The Hazardous Waste Store has Permit which shows through Head of BAPEDALDA of Rokan Hilir Regency Decree No. 54/BPDL/2015 dated 27 November 2015, which valid for 5 years. This matter is further detailed on Indicator 5.3.2. Based on field observation and interview with pesticide applicators in all estates, it could be concluded that the workers were able to explained and demonstrate several technical skills such as PPE used, spraying techniques and prohibited application areas such as HCV and riparian areas which marked with yellow paint on palm trunks or yellow poles. Furthermore, based on field observation to pesticides Store in all Estates, it was found that all MSDS were available and match with pesticide stocks, symbols of risk and hazardous level, instruction and PPE used were displayed properly. Furthermore there are block spraying system (BSS) House as pesticide mixing and PPE's place. Moreover, observation to central housing complex shows that there was no use of used pesticide containers for household purposes.

#### **4.6.7**

Work instruction on pesticide application No. 722/PSQM-PSS/10 dated 13 December 2010 about pesticide application has follows technique presented in Material Safety Data Sheet (MSDS) of pesticide products, Procedure No. PM 0800 dated 01 April 2010 about Block Spraying System (BSS), Procedure No. 394/IT-LB3-23/11 dated 27 September 2011 about Hazardous materials management and Hazard Identification Risk Assessment Control (HIRAC) for estate. All reference mentioned in the former has covers guideline of storage and handling of pesticides, handling of accident and first aid, risk



identification, pesticides spills and leaks handling, PPE, physical and chemical properties, reactivity and material stability, toxicology and ecology information, pesticide wastes handling and transportation.

The Company has conducting several trainings which aims to maintain workers knowledge and skills towards safe pesticide application. For example, training and socialization of BSS, MSDS and HIRAC for Pesticide Applicators has conducted on 08 April 2019. The training is given by MRC Assistant, attended by all Pesticide Applicators. Material of training, picture documentation, and attendance list were available. Based on field observation and interview with Foreman and Pesticide Applicators in Division 4 Block G32/33 MGE-1 and Division 3 Block C005 MGE-2, it could be concluded that the workers are able to explain and demonstrate its job in accordance with the SOP, such as justification of pesticide usage, considering wind flows during spraying, pesticide mixing, pesticides and its target, prohibited areas to be sprayed (for example conservation area and riparian zone, which were marked with yellow poles and/or yellow mark on the palm trunks) as well as PPE's to be used and its management. Pesticide applicators has also mentioned that pregnant and breastfeeding women are strictly prohibited to works related with agrochemicals. Furthermore, based on field observation to Pesticides Warehouse in all estates, it was found that all MSDS were available and match with pesticide stocks, symbols of risk and hazardous level, instruction and PPE used were displayed properly. Moreover, there are block spraying system (BSS) House as pesticide mixing and PPE's place in both estates. As observed to housing complex, it was known that there was no use of used pesticide containers and other agrochemicals for household purposes.

As observed, upkeep team has brings food to the field. However, such activities has conducted on different or non-sprayed area. Clean water and soap were available on site.

**4.6.8**

Based on field observation and information from estate management, it was informed that there were no pesticide application through aerial method by plane. All pesticides has applied through spraying both manually and mechanically.

**4.6.9**

The Company has conducting several trainings which aims to maintain workers knowledge and skills towards safe pesticide application. For example, training and socialization of BSS, MSDS and HIRAC for Pesticide Applicators has conducted on 08 April 2019. The training is given by MRC Assistant, attended by all Agrochemical Applicators. Material of training, picture documentation, and attendance list were available. Based on field observation and interview with pesticide applicators in all estates, it could be concluded that the workers were able to explained and demonstrate several technical skills such as PPE used, spraying techniques and prohibited application areas such as HCV and riparian areas which marked with yellow paint on palm trunks.

**4.6.10**

Procedure of pesticide wastes included used containers is presented in procedure No. 701/IK-TQEM-ESH/10 and No. PLB3 and BB3 (Rev. 01) dated 19 July 2011. Estate management mentioned that used pesticide containers could be reused for the same purposed such as for mixing containers, or to be delivered to Hazardous Waste Store which will be collected by permitted collector namely CV Amindy Barokah. This matter is further detailed on Indicator 5.3.2 Based on field observation, it was found that used water for pesticide mixing were trapped and reused for the next mixing in the BSS. Furthermore, observation to housing complex shows that there was no use of discarded pesticide containers and other agrochemicals for domestic household purposes.

**4.6.11**

The company already has an updated list of pesticide operators in August 2019 for each estate, as follows:

Unit	Women Worker	Man Worker	Total
Manggala 1 Estate	11	-	11
Manggala 2 Estate	-	8	8
Manggala 3 Estate	9	1	10
<b>Total</b>	<b>20</b>	<b>9</b>	<b>29</b>

The company has a routine medical surveillance record (health check) for all workers working with chemicals / high-risk workers in each unit. Health checks are carried out routinely every year, the following are inspection activities carried out by the company on 22-24 July 2019 with the number of workers being examined as many as 207 workers (sprayers, fertilizers, generator operators, workshop workers, mill operators and others). The examination carried out is an examination of cholinesterase, audiometric and spirometry. Based on the results of the inspection, it is known that there

are workers who experience negligence / health problems so that further examination and transfer of work are needed temporarily. The following are examples of documents for the transfer and further inspection of these workers, including:

- Letter of Work Transfer No. 01 / Div.Nursery / MGE-1 / VIII / 2019 dated 16 August 2019 for workers from spray employees to nursery employees for 4 weeks and will be re-checked for health after the transfer period is complete.
- Letter of Work Transfer No. 02 / Div.Nursery / MGE-1 / VIII / 2019 dated 16 August 2019 for workers from spray employees to nursery employees for 4 weeks and will be re-checked for health after the transfer period is complete.
- Results of follow-up examinations to 10 workers with abnormalities from the results of an audiometric examination at Permata Hospital in Mandau District, Bengkalis Regency, Riau Province. The examination found that 9 workers were still able to work again in their old jobs and needed better use of PPE. While there is one person who is recommended for referral to an ENT (Ear, Nose & Throat) specialist at a larger hospital.

In addition to conducting routine inspections and obtaining results, the company also conducts socialization to workers who have participated in routine inspections related to the results of these inspections. This is in line with the results of interviews with spray and fertilizer workers who stated that they were aware of the results of the examination that had been carried out directly from the company doctor when the results of the inspection were obtained by the company.

**4.6.12**

The company has a policy on female workers on December 1, 2014 which explains that pregnant women are prohibited from carrying out work related to chemicals (spraying and fertilizing) and for workers who have just given birth / breastfeeding for 1 year are prohibited from carrying out activities related to chemicals. In addition, the company has procedures for prohibiting pregnant or nursing women from working in chemicals-related work. The procedure is stated in:

- Clinic SOP No. Policy RSPO / 5.3 / PLB3 & BB3. In the procedure there is an agreement against female workers dated July 1, 2010 covering: (1) Provision of H1 (menstrual leave); (2) Provision of H2; (3) The policy prohibiting pregnant women from working as a spray and fertilizer team; (4) Prohibition of women workers who are breastfeeding from working in the field of work related to chemicals; (5) Policy on the protection of women workers from the treatment of sexual harassment.
- MGE's Internal Memorandum on July 2, 2014 to all MGE field assistants and supervisors who stated that "It is not permissible for Pregnant Women and Women Workers who are breastfeeding to work using pesticides / chemicals.

The company has an updated list of pesticide operators in August 2019 for each estate with a total of 29 workers who are pesticide operators and 20 of them are female workers. The company has collaborated with PUSKEMAS Bangko Pusaku and PUSKEMAS Pujud to carry out routine inspections (*posyandu*) for women workers every month on each unit. This is done to ensure that no female workers who are pregnant and breastfeeding work in jobs related to chemicals.

Based on H1 monitoring data and letter of transfer of work from spray to manual care it is known that spray workers should not be undertaken by pregnant and lactating mothers. The results of interviews with the chair of the gender committee and spray workers are known that pregnant women will be transferred to light care jobs such as company office estate maintenance.

**Status: Comply**

**4.7**

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

**4.7.1**

**Safety Policy**

There is no change of safety policy, which presented in Head Plantation Upstream Indonesia dated December 2011. The Company is committed to provide a safe working environment for all employees and visitor, as well as strive to facilitate a proper protection for workers and company asset which aims to avoid accident and damage incidence. The policy is available in Bahasa. Socialization has been conducted to all employees include contractor and visitor through safety briefing before starting activities on the sites. This is confirmed during audit. Based on interview with workers in estates and mill, it was informed that safety briefing is conducted daily during muster morning. Socialization of occupational health and safety (OSH) is conducted annually.

**OSH Program and Socialization**

MGF shows P2K3 program for period 2019 which consist of 8 main program, i.e. safety briefing and PPE evaluation,

monitoring of OSH facilities, maintenance of transportation devices, workshop management layout, electrical maintenance, Store management, and general OSH activities such as reporting, inspection, internal audit, inspection, etc. Furthermore, MGE shows P2K3 program for example in MGE-2 dated January 2019 has consist of 5 main program, e.g. safety and technical trainings, monthly meeting, BSS management, ESH socialization and safety briefing.

#### **OHS Meeting**

The CH has able to shows monthly meeting of OHS Committee records which presented in the Minutes Meeting documents, for example as follows:

- Minutes of P2K3 meeting for MGE-2 in June 2019 had been conducted on 03 June 2019. The meeting was attended by 14 committee members. Issues being discussed are safety briefing for PPE usage, work safety culture, socialization of SOP and HIRAC, harvesting rotation and PPE monitoring before works.
- Minutes of P2K3 meeting for MGF in June had been conducted on 10 June 2019, attended by 18 committee members. Issues being discussed are safety briefing, lock out tag out (LOTO) system, material safety and sime card.

#### **P2K3 Report**

- Delivery Letter of P2K3 Quarter 2 2019 report of MGF No. 164/P2K3-MGF/07/2019 dated 07 June 2019, delivered to Manpower Agency of Riau Province, accepted on 08 June 2019.
- Delivery Letter of P2K3 Quarter 2 2019 report of MGE-1 No. 164/P02/P2K3/VI/2019 dated 01 July 2019, delivered to Manpower Agency of Riau Province. Accepted on 02 July 2019.

#### **4.7.2**

Procedure of Hazard Identification Risk Assessment and Control (HIRAC) is presented in procedure No. 7301/PSQM-ESH/11 dated 07 July 2011. Company management is able to shows HIRAC document which issued by the respective OSH Committee Secretary and Estate/Mill Manager. According to document review, it was known that the assessment and analysis has covers all relevant mill and estate operational activities. The company is able to shows documents related to accident happened such as Official Report of Accident, Investigation report, medical and recommendation record, medical certificate, BPJS report, etc. For example, several documents related to accident which caused mandays lost for 8 days in MGF is presented as follows:

- Investigation report dated 22 July 2018 which informed accident of mechanic maintenance operator on the left thumb and pointing finger due to emery-wheel in 22 July 2018 at 03:00 pm. Type of accident was contact with sharp object/entanglement due to improper use of device. Class of accident is categorized as Class 3 which required leave for more than 3 days.
- Cronology report by Assistant dated 22 July 2018 for accident to worker with Employee No. 52465.
- First Step report to BPJS through Form 3KK1 has delivered on 23 July 2019. The injury should be treatd in the Hospital of Cahaya at Ujung Tanjung.
- Second Step report of BPJS through Form 3aKK2 has delivered on 23 July 2018. Claim of BPJS is arranged by PT TMP.
- BPJS Covering Letter of Traumatic Center Service for Emergency Unit of Public Hospital in Dumai dated 23 July 2018, signed by MGF Manager.
- Leave Request letter dated 22 July 2018 for accident due to maintenance works on plat strip autofeeder No. 3 teplacement to the respective worker, signed by Assitant and Senior Assitant.
- Absence letter of the respective workers shows the leave has been paid by the company.

#### **4.7.3**

##### **OSH Trained Competency**

The company management is able to shows Operators/Workers License monitoring, summarized as follows:

- MGE-1 has 1 Hiperkes paramedic; 1 certified welder; and 4 licensed lifting apparatus (tractors, excavator, grader) operators which valid until 23 February 2023 and 10 July 2023.
- MGE-2 has 1 certified welder, 4 licensed lifting apparatus (tractors, excavator, grader) operators which valid until 08 September and 20 October 2022; and 1 licensed Electricity Technician which valid until 05 May 2020.
- MGE-3 has 1 certified welder; 6 licensed lifting apparatus (tractors, excavator, grader) operators which valid until 23 February 2023 and 20 May 2024; 1 licensed Electricity Technician which valid until 05 May 2020.
- MGF has 1 certified welder Class 1; 6 licensed lifting apparatus (4 crane Class 3 and 2 Loader) operators which valid until 24 November 2024; 1 licensed Electricity Technician which valid until 05 May 2020; 2 Motor Diesel Operators Class 1 which valid until 27 November 2022; and 3 Boiler Operators Class 1 which valid until 31 May 2021 and 29

June 2023.

**OSH Related Training**

Based on interview with harvester, pesticide applicator and fertilizer applicator in all estate, as well as operator on the mill, it was informed that technical training that including safety aspect has been conducted annually. All workers were able to explained their safety working practices, PPE to be used, PPE and work devices management, etc.

**Personal Protective Equipment.**

Estate and Mill management are able to shows PPE delivery record which in accordance with HIRAC and/or MSDS of product. Based on field observation to all estates and mill, it was known that the PPE has provided properly. Broken and/or unproper PPE could be replaced by workers. Furthermore, monitoring of PPE has conducted daily by Foreman and Assistant.

**4.7.4**

Company occupational safety and helath monitoring and implementation is carried out by OSH Committee (P2K3), as follows:

- P2K3 for MGF legitimation shows through Decree of Manpower Agency Head of Riau Province No. KEP.143/Disnakertrans-PK/SK-P2K3/VIII/2019 dated 14 August 2019, with OSH Secretary was OSH Expert with Reg. No. 22781/PK3/AJ/31/2018/P1, valid until 01 February 2022.
- P2K3 for MGE-1 legitimation shows through Decree of Manpower Agency Head of Riau Province No. KEP.13/Disnakertrans-PK/SK-P2K3/I/2019 dated 17 January 2019, with OSH Secretary was OSH Expert with Decree of Appointment No. KEP.14074/M/DJPPK.VI/2015 dated 19 June 2015, valid until 19 June 2018. Extension process of license is still ongoing as shows through information from Director Letter of PT Arpindo Pratama (Safety Training Organizer) No. 593/AP/K3/VIII/2019 dated 13 August 2019.
- P2K3 for MGE-2 legitimation shows through Decree of Manpower Agency Head of Riau Province No. KEP.68/Disnakertrans-PK/SK-P2K3/III/2019 dated 25 March 2019, with OSH Secretary was OSH Expert with Reg. No. 6208/PK3/AJ/31/2016/P1, valid until 24 October 2019. Extension of OSH Expert evidence is available.
- P2K3 for MGE-3 legitimation shows through Decree of Manpower Agency Head of Riau Province No. KEP.142/Disnakertrans-PK/SK-P2K3/VIII/2019 dated 14 August 2019, with OSH Secretary was OSH Expert with Reg. No. 22782/PK3/AJ/31/2018/P1, valid until 01 February 2022.

The CH has able to shows monthly meeting of OHS Committee records which presented in the Minutes Meeting documents, for example as follows:

- Minutes of P2K3 meeting for MGE-2 in June 2019 had been conducted on 03 June 2019. The meeting was attended by 14 committee members. Issues being discussed are safety briefing for PPE usage, work safety culture, socialization of SOP and HIRAC, harvesting rotation and PPE monitoring before works.
- Minutes of P2K3 meeting for MGF in June had been conducted on 10 June 2019, attended by 18 committee members. Issues being discussed are safety briefing, lock out tag out (LOTO) system, material safety and sime card.

**4.7.5**

Procedure of emergency is presented in several documents, i.e. Policy No. 712/TQEM-KRKD/10 about emergency response and mitigations, No. 716/TQEM-PK/10 about fire prevention, and No. 717/TQEM-PK/10 about hazardous materials leakage. The procedure has covers identification which may caused emergency situation due to fire, hazardous and hazardous waste materials, natural disaster, etc. emergency team which appointed to overcome thoses situation were available as mentioned in OSH Committee. The company is able to shows investigation of accident record for period 2018/2019, as well as its follow up documents, such as Official Report of Accident, Investigation report, medical and recommendation record, medical certificate, etc. Manday lost due to accident were still paid by the company as verified to the salary payroll. Based on observation to estate and mill operational areas, it was known that the company has provide proper First aid kit box, in accordance with applicable regulation. Training of first aid in all unit is delivered by company doctor annually. For example, first aid training for all units has conducted in 14 August 2019 at MGE-3, attended by 39 workers from all Divisions. This is confirmed during interview with Foreman in all units. Based on observation to all estates and mill, it was known that all Foreman were equipped by first aid kit. Furthermore, first aid kit box which installed on estate and mill buildings were complete and satisfactory monitored.

**4.7.6**

The company has registered all workers in the “BPJS Kesehatan & Ketenagakerjaan” program in accordance with

government regulations in force in Indonesia. The company can also show proof of payment of routine BPJS contributions which are paid monthly for all workers in each plantation and mill unit, including:

- “BPJS Kesehatan” Payment Manggala 1 Estate for the period of August 2019 for 501 workers which was paid on August 6, 2019.
- “BPJS Ketenagakerjaan” Payment Manggala 1 Estate for the period of July 2019 for 501 workers paid on August 6, 2019.
- “BPJS Kesehatan” Payment Manggala 2 Estate for the period of August 2019 for 434 workers which was paid on August 5, 2019.
- “BPJS Ketenagakerjaan” Payment Manggala 2 Estate for the period of July 2019 for 434 workers which was paid on July 22, 2019.
- “BPJS Kesehatan” Payment Manggala 3 Estate for the period of August 2019 for 420 workers which was paid on August 6, 2019.
- “BPJS Ketenagakerjaan” Payment Manggala 3 Estate for the period of July 2019 for 420 workers which was paid on August 6, 2019.
- “BPJS Kesehatan” payment Manggala POM for the period of August 2019 for 116 workers which was paid on August 6, 2019.
- “BPJS Ketenagakerjaan” Payment Manggala POM for the period of August 2019 for 116 workers which was paid on August 6, 2019.

In addition to involving workers in the “BPJS Kesehatan & Ketenagakerjaan” program, the company can show proof of payment of “BPJS Kesehatan & Ketenagakerjaan” owned by contractor workers who work in the company’s operational environment, including:

- “BPJS Ketenagakerjaan” Payment of PT Mitra Karya Jaya Perdana for the period of July 2019 for 90 workers which was paid on July 24, 2019.
- “BPJS Ketenagakerjaan” Payment of PT Mitra Karya Jaya Perdana for the period of July 2019 for 31 workers which was paid on July 9, 2019.

The company routinely reports work accidents to relevant agencies in accordance with applicable regulations for claims made for work accidents. The following is the documentation of the report made by the company, namely: Reporting of Work Accident Cases Phase I, II and III to the “BPJS Ketenagakerjaan” for Arifin Siregar workers (mill workers) with cases of injured fingers slashed by a cutting machine on the date of July 22, 2018. The workers claim process has been completed and received compensation from the BPJS Employment through the Bank transfer mechanism.

Proof of this policy is still valid is that workers and their families still get free health services at company clinics and hospitals in accordance with “BPJS Kesehatan & Ketenagakerjaan” services that are registered. The guarantee for workers, including accidents, is also still entirely borne by the company and “BPJS Ketenagakerjaan”. This is indicated by the evidence of claims submitted to the “BPJS” from the company and workers who did not incur expenses when handling them.

**4.7.7**

The company has a record of work accidents using the Lost Time Accident (LTA) matrix as a reference to determine and calculate the total workday loss, severity rate and frequency rate of all accidents that occur in the company. The following is a record of work accidents that occurred during the past year (January 2018 - July 2019) using LTA matrices, including:

Unit	Total Incident	Lost Time	Severity Rate	Frequency Rate
MGE – 1	1	3	1	3
MGE – 2	-	-	-	-
MGE – 3	-	-	-	-
MGF	1	8	3	21

Based on the above table it is known that during the period January 2018 - June 2019 there were 2 accidents that occurred with a total loss of working days is as much as 11 days for all units.

**Status: Comply**

**4.8**



**All staff, workers, smallholders and contractors are appropriately trained.****4.8.1 & 4.8.2**

The identification of training needs for each worker has been included in the 2019 Training Matrix document available in the estate and mill. The matrix explains the training needs for each job, including:

- Clerks harvest requires training on crop quality, Collective Labor Agreement socialization, emergency response training, first aid training, PPE socialization and others.
- Mechanics require training in work procedures, first aid, PPE, OHS, ISPO, RSPO socialization and others.
- Nurses need first aid training, PPE, accident investigation, ISPO, RSPO, social impact management and others.

The company has a training program in 2019 for each plantation and mill unit aimed at all workers (permanent and contract worker). The following is the training plan for 2019, namely training in harvesting, transportation, fertilizer, spray, manual maintenance, warehouse staff, workshop, fire, P2K3 socialization, pest and disease training and other trainings. The company also has training program for contractor worker such as socialization of OHS, PPE, Company Policy and others.

The company has documented all training activities / realization carried out in accordance with the plan established in 2019, the realization of the training include:

- The socialization of hazardous waste storage and management at Manggala POM on May 5, 2019, which was attended by 105 participants.
- The socialization of hazardous waste storage and management at the Manggala POM house on March 10, 2019, which was attended by 47 participants.
- PPE socialization on 11 February 2019 for harvest workers attended by 47 participants.
- Fertilization training on 10 April 2019 for care workers attended by 8 participants.
- Spraying training for the spraying team on March 19, 2019 which was attended by 19 participants.
- First aid training for fertilizer and spray workers on 22 February 2019 which was attended by 26 participants.
- PPE and HIRARC socialization on April 19, 2019 which was attended by 22 participants.
- Caterpillar control training for census officers on 12 February 2019 which was attended by 10 participants.
- SOP socialization for each work on January 7, 2019 which was attended by 19 participants.
- SOP and company policy socialization conducted on March 29, 2019 which was attended by the community and village apparatus of around 22 participants.
- Safety Town Hall and Company Policy Socialization on 14 February 2019 which was attended by 427 participants.
- Safety Town Hall and Company Policy Socialization on 20 February 2019 which was attended by 351 participants.
- Safety Town Hall and Company Policy Socialization on February 8, 2019 which was attended by 438 participants.
- Safety Town Hall and Company Policy Socialization on 13 February 2019 to local contractors attended by 15 participants.
- Fire emergency response simulation on 18 July 2019 attended by 60 participants.
- SCCS Training and Socialization on June 2, 2019 which was attended by 7 participants.
- Training Lotto on 10 June 2019 which was attended by 9 participants
- 5S socialization to the internship students on 223 February 2019, which was attended by 9 participants.

The company has documented the training records for each worker in accordance with the training that he has participated in every year. The following are examples of training records for each worker that has been shown by the company, including:

- Records of training for Manggala 1 Estate workers who have followed first aid training, harvesting, and socialization of company policies in 2018-2019.
- Manggala 2 Estate workers training records that have followed first aid, HCV, OHS training, spraying, and socialization of company policies in 2018-2019.
- Records of training for Manggala 3 Estate workers who have followed OHS, first aid training, harvesting, and socialization of company policies in 2018-2019.
- Manggala POM worker training records which have followed boiler operator training, OHS and company policy socialization in 2018-2019.

Based on field observations and interviews with harvest, fertilizer, spray and contractor workers in the field it is known that

the workers have understood the work procedures in accordance with those set by the company and can explain it well, so that the workers have understood their duties and responsibilities for each Occupation. The company has every workers record of training and it has been well documented.

**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**  
PT Tunggal Mitra Plantation has conducted an AMDAL study and has been approved by relevant agencies. The company also has documentation related to AMDAL along with Environmental Permits, namely:

- SEIA documents of PT Tunggal Mitra Plantation which were approved by the Minister of Agriculture in accordance with the Minister of Agriculture's Letter No. RC. 220/950 / B / V / 1994 dated May 28, 1994 concerning the SEIA Agreement of PT Tunggal Mitra Plantation. In this document the scope of the study covers an area of 18,000 hectares and the PKS capacity of 60 tons of FFB / hour. In the SEIA document that's has been covering all activities in the plantation such as replanting, land clearing and others.
- The PT Tunggal Mitra Plantation RKL / RPL (Environment Monitoring & Management) document was approved by the Agriculture Ministry Administration Agency No. 001 / RKL-RPL / BA / VI / 94 dated June 24, 1994.
- Revised RKL / RPL (Environment Monitoring & Management) document approved by the Head of the Regional Environmental Impact Management Agency (BAPEDALDA) of Rokan Hilir Regency in accordance with Letter No. 666.1 / AMDAL-BAPEDALDA / 2006/12 dated August 23, 2006 concerning Approval of the Adjustment of Environmental Management Plan (RKL) and Environmental Monitoring Plan (RPL) of PT Tunggal Mitra Plantation Oil Palm Plantation and Processing Plant Activities in Rokan Hilir Regency, Riau Province. In this document the scope of Environmental Management and Monitoring covers an area of 13,836 hectares and the capacity of PKS is 60 tons of FFB / hour.

**5.1.2**  
The company has an environmental management plan listed in the RKL-RPL (Environment Monitoring & Management) matrix as follows: erosion, sedimentation, air quality, noise, river water quality, liquid waste quality, solid waste quality, fire potential, disturbance of flora and fauna, damage to road access, declining health environment, reduced public health, public unrest, management of environmental and social impacts due to replanting. The environmental management plan has identified the people responsible for adjusting to the parts and areas of each PIC and is accountable to their respective Managers.

The company has also conducted studies on the impact of replanting operations and is predicted to emerge due to this replanting activity:

- Hydrological aspects and subsidence of peat such as decreased water storage capacity due to the process of dismantling plant staples and soil compaction, as well as greenhouse gas emissions due to replanting activities on peat lands
- Impacts on biodiversity, namely changes in terrestrial and aquatic habitat conditions due to the opening of land cover in replanting areas
- Impacts on the social aspects of the workforce: replanting activities have the potential to increase the chances of flooding if management does not apply water channel management techniques. The impact on the workforce aspect is employment opportunities and efforts for the community around the company in replanting activities such as making drainage, heavy equipment operators, uprooting and piling activities

In addition to conducting and predicting replanting impact studies, the company also has an impact management plan to minimize the predicted impacts that will occur are:

- Hydrological aspects: ensuring drainage channels are functioning properly, strengthening the roadside with vegetation cover, periodically monitoring the depth of the trench, conducting compaction to avoid excessive subsidence.

- Biodiversity aspects: provide clear direction for heavy equipment operators so as not to violate borders, control the process of felling, enrichment of river border areas with fast-growing plant species, and regulate the felling of palm oil to the edges so that no animals are trapped in the middle of the replanting area.
- Labor social aspects: ensuring replanting contractors recruit local workers and pay them according to local standards.
- In carrying out environmental management which aims to reduce negative impacts so that it can be better has been carried out by the company, including the following activities:
- Plant Legume Cover Crop in young plant areas (replanting in 2018 and 2017)
- Greening around the mill and striving to improve safety for employees by using PPE as well as conducting routine inspection of machines
- Management of wastewater to meet quality standards before being discharged on land applications
- Making pit bund on undulating land with a level of 8°-15° slope.
- Make efforts by forming a special team to monitor, prevent early, control and provide firefighting equipment, monitoring equipment and patrols for fire prevention.

5.1.3

The company has an environmental management plan listed in the RKL-RPL (Environment Monitoring & Management) matrix as follows: erosion, sedimentation, air quality, noise, river water quality, liquid waste quality, solid waste quality, fire potential, disturbance of flora and fauna, damage to road access, declining health environment, reduced public health, public unrest, management of environmental and social impacts due to replanting. The environmental management plan has identified the people responsible for adjusting to the parts and areas of each PIC and is accountable to their respective Managers.

The suitability of the environmental management and monitoring plan and the actual condition of the company is reviewed through semester evaluation. The company has carried out environmental monitoring activities such as: Surface water quality monitoring, waste water quality monitoring, emission testing, ambient air, monitoring aquatic biota etc. As for the environmental monitoring activities that have been carried out as indicated by the results of the test, it still shows results in accordance with applicable regulations. In addition, environmental management and monitoring activities have been reported in the RKL / RPL (Environment Monitoring & Management) reporting report for example for semester 1 of 2019 which was reported to the Ministry of Environment and Forestry using an online system through the Electronic Environment Reporting Information System (SIMPEL) on August 21 2019. Based on the document review, the company has been all of monitoring for environmental aspect and there is no other conformance rised from monitoring activity.

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

Refer to previous assessment, the identification for protected species, rare, or endangered, and the habitate with high conservation value had been done in 2009 by in cooperation with the third parties. The assessment of HCV has been included the identification of protected area, flora and fauna, and also the status of its preservation (indicator 5.2.2). The HCV assessment method has been considered adequate and refered to the tool kit of RSPO HCV in 2008. The evidence of public consultation has been done on 8 January 2010. HCV area is 21.20 Ha such as Bangko Riparian area. PT. Tunggal Mitra Plantation has a complete and adequate HCV location map that shows the distribution of HCV locations throughout the operational areas. HCV maps are available in each estate of PT. TMP.

5.2.2; 5.2.3

To ensure HCV area are well maintained, the company has conducted several activities as programmed, as follows:

- HCV area management: Efforts have been made to enrich the HCV area by planting as many as 38 stems of *bintaro* wood species (*Cerbera manghas*) in July 2019 in Manggala 1. Planting Waru trees (*Talipariti tilaceum*) as many as 9 stems and Angsana (*Pterocarpus indicus*) as many as 65 stems in July 2019 in Manggala 1. Planting Waru trees (*Talipariti tilaceum* and *Angsana (Pterocarpus indicus)*) in Manggala 2. In addition, routine monthly monitoring of the presence of animals is also carried out. July observations showed that there were 20 species out of a total of 60 species that were identified during the HCV assessment.



- Management of HCV potential areas: installation of protected animal signboards.
- Re-painting of HCV area boundary markings: HCV area was marked and marked in July 2019.
- Workforce education and training □ there is evidence of HCV socialization to the foremen in Manggala 2 on 8 April 2019 attended by 14 employees.
- Examination of HCV symbols and potential sign signboard maintenance and new installation for damaged signboards.  
*Notes: the area identified as potential is an enclave of animals that the community currently has pledged.*

Based on interview with workers on the estates and mill, it was known that CH management has conduct socialization towards RTE speciasm included several prohibition as required and arranged by applicable policy in Indonesia.

**5.2.4; 5.2.5**

CH has work programme of HCV that is available for every year. Based on field visits and document review, it was discovered that CH had realized an HCV management plan, for example:

- Socializing HCV locations through pamphlets
- Conducting enrichment in the HCV area by planting forest and bamboo plants around the river border such as waru, mahogany and angkana
- Monitoring HCV areas including protected animals.
- Record of HCV socialization by giving brochures to students on 11 April 2018 (attached attendance and photos).

Maximizing HCV area enrichment programs with woody plants. **OFI**

CH has evaluated HCV management plans every month based on HCV monitoring results. It contained in the document PT TMP HCV Area monitoring report. Based on field visits and interviews with village communities (Sukajadi and Desa Perkebunan Siarang – arang Rokan), there were no community areas that overlapped with the HCV area.

**Status: Comply**

**5.3**

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

**5.3.1**

The company has identify sources of wastes for period 2018/2019, as follows:

- Domestic household produced wastes such as plastic, paper, glass and organics material. These solid wastes is managed by collected into the landfill.
- Estate/Mill Division produced hazardous wastes such as used lubricants (oil), used filter, used fabrics, used chemicals containers, etc. Those which classified as hazardous materials is managed through collection on the permitted Hazardous Waste Store and delivered to the licensed Collector that currently managed by CV Amindy Barokah. Furthermore, there is non-hazardous waste such as used spareparts, used tire, papers, etc. The cooperation between PT TMP and CV Amindy Barokah is shows through Agreement Letter No. 167/TMP-ABS/SPK-LB3/IV/2019 dated 02 April 2019, valid until 02 April 2020.
- Medical or infectious wastes is delivered to Hospital of Cahaya in Ujung Tanjung. The cooperation between PT TMP and Hospital is shows through Agreement Letter dated 20 October 2016 about medical waste management.
- By-products such as EFB, POME, fibre, shell and ash is used for nutrient cycle through mulching and land application; and source of energy in Boiler. The ash has also used for road compaction.

There are also sources of pollution, especially that emits GHG and other pollution such as noisy level, vibration, odor, etc. technical mitigation to overcome those pollution has also mentioned on the list. For example, mitigation pollution is Boiler has conducted through mixing of fibre and shell, installing smoke density meter, weekly furnace and dust collectormaintenance, periodic monitoring towards emission measurement, usage of proper PPE for operators, planting of trees, etc.

**5.3.2**

Hazardous wastes produced by PT TMP are stored on the permitted Store with permit through Decree of Bapedalda Head No. 54/BPDL/2015 dated 27 November 2015, valid for 5 years. Company management shows recapitulation of hazardous material wastes delivery to CV Amindy Barokah, as shows in Hazardous Waste Report for period April to June in Quarter

2 2019 as follows:

Type of Hazardous	Volume (kg)	Manifest
Used fibrics	24	No. AVT 0010342 dated 12 June 2019
Used lubricants	600	No. AVT 0010339 dated 12 June 2019
Used chemicals containers	300	No. AVT 0010340 dated 12 June 2019
Used filter	33	No. AVT 0010343 dated 12 June 2019
Used lamp	18	No. AVT 0010267 dated 12 June 2019
Used battery	40	No. AVT 0010268 dated 12 June 2019

Report of hazardous material has been accepted by Environment and Forestry Agency of Rokan Hilir Regency and Riau Province on 11 July 2019. Balance of hazardous waste on the Store was in accordance with the report. Based on observation to Hazardous Material Store in MGF, it was known that record balance was available and hazardous material stored were in accordance with Store permit. Furthermore, Store has a proper design, good ventilation, and equipped with alarm, first aid kit, fire extinguisher, eye wash and shower. Furthermore, record of medical or infectious waste delivery to Hospital of Cahaya in Ujung Tanjung is shown through Delivery Letter in Form No. RSPO/5.3/OB/03/09 dated July 2018, with delivery item is presented in the following Table:

Medical/Infectious Item	Volume
lint	1 ons
Ex PH Cain	2 ampule
Ex Sput disposable	1.2 ons
Plaster	1 ons
Needle disposable	1.3 ons

Based on explanation above, it could be concluded that all chemicals and its containers has properly managed in accordance with applicable regulation in Indonesia.

### 5.3.3

Program of waste management is refers to several procedure, such as No. PLB3 and BB3 (Rev. 01) 2012 about hazardous waste management, PSQM Memorandum No. 009/PSQM-UM/X/2011 about household waste management, etc. Record of waste management is presented as follows:

- **Household Waste:** The company has provide 3 landfills that located in all Estate with distance more 1 km from employees housing areas. Based on observation to housing area in all estate, it was known that cleanliness of housing complex has considered good and there were no sign of burning activities. Household wastes is delivered to the landfill twice a week.
- **Medical and Infectious Waste:** Medical or infectious wastes is delivered to Hospital of Cahaya in Ujung Tanjung. The cooperation between PT TMP and Hospital is shown through Agreement Letter dated 20 October 2016 about medical waste management. For example, record of medical or infectious waste delivery to Hospital of Cahaya in Ujung Tanjung is shown through Delivery Letter in Form No. RSPO/5.3/OB/03/09 dated July 2018.
- **Hazardous Waste:** Hazardous wastes produced by PT TMP are stored on the permitted Store with permit through Decree of Bapedalda Head No. 54/BPDL/2015 dated 27 November 2015, valid for 5 years. Thus, the waste were collected by the permitted/licensed collector namely CV Amindy Barokah, with cooperation shown through Agreement Letter No. 167/TMP-ABS/SPK-LB3/IV/2019 dated 02 April 2019, valid until 02 April 2020. Company management is able to show recapitulation of hazardous material wastes delivery to CV Amindy Barokah. Report of hazardous material has been accepted by Environment and Forestry Agency of Rokan Hilir Regency and Riau Province on 11 July 2019. The company has also able to show hazardous waste balance, for example as follows:
  - Delivery of used fabric (contaminated gloves) 4 pcs from MGF on 20 August 2019.
  - Delivery of used pesticide containers 5 kg from MGF on 20 August 2019. Up to 22 August 2019, it was known that there were 492 kg of used chemical containers stored.

However, Based on observation to Fuel/Diesel Station in MGE-3, it was found that there is no receptacle or containment of diesel during bunkering, thus causing spilled and exposed on the ground. This fact noted as **NCR No. 2019.02 with minor category.**
- **By-products Waste:** EFB and POME has used for nutrient cycle purposes and documented in monthly Estate Manager report chapter monthly work realization, realization of manuring report and by-product realization report. EFB dosage recommended varies about 150 to 200 kg/palm/year in replanting areas and about 250-300

<p>kg/palm/year in mature areas, which depends on field condition. Furthermore, POME applied were about 700-750 m<sup>3</sup>/ha/year which divided into 3 rotation. Fiber and shell has used in Boiler for energy substitution which expected to reduce fuel consumption. Based on monitoring recored, it was known that during 2018 to 2019, efficiency of by-products for electricity production were ranged from 0.72 to 13.19 lt Diesel per ton CPO produced.</p>	
5.3.3	Status: Non Conformities No. 2019.02 indicator Minor
<p><b>5.4</b> Efficiency of fossil fuel use and the use of renewable energy is optimised.</p>	
<p><b>5.4.1</b> MGF has calculate efficiency of fuel through usage of oil palm by-products such as fibre and shell. As record review, it could be concluded that during 2018 to 2019, efficiency of by-products for electricity production were ranged from 0.72 to 13.19 lt Diesel per ton CPO produced. Declined of efficiency is spotted in April to May 2018. Regarding this matter, MGF management informed that since April to May 2018, electricity is supplied by Government Electricity Company (PLN).</p>	
Status: Comply	
<p><b>5.5</b> 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.</p>	
<p><b>5.5.1 &amp; 5.5.2</b> PT TMP's no-burning policy is contained in the SOP for Agronomy Reference Manual Section 4 on Land Preparation. In the SOP, describe that company not allowed to burn in an effort to prepare land either replanting or for land clearing.  The Company has implemented a land clearing policy without burning. For example, the results of field observations on replanting area showed that there is no indication of burning activities in the replanting process.</p>	
Status: Comply	
<p><b>5.6</b> Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.</p>	
<p><b>5.6.1</b> The company has identify source of GHG emission. According to identification record, it was known that only development of Biogas Plant is not implemented yet. MGF management informed that there is no plan to develop Biogas Plant in the near future. According to RKL/RPL Semester 1 period 2019 review, it was known that MGF has measure emission for Boiler, Genset, and air quality ambien, as refers to Minister og Environment Regulation (PermenLH) No. 07 in 2007 and PermenLH No. 13 in 2009; as well as Government Regulation (PP) No. 41 in 1999. Testing results indicated that all parameter measures were bellow threshold limits as required by applicable regulations in Indonesia.</p>	
<p><b>5.6.2</b> Company management has identified source of GHG emission which presented in Indicator 5.6.1. Realization of GHG Emission mitigation program is presented as follows (for example):</p> <ul style="list-style-type: none"> <li>• Planting of 27 trees of <i>Pterocarpus indicus</i> (Angsana) in MGE-1 has been carried out on July 2019.</li> <li>• Planting of 18 trees of <i>Pterocarpus indicus</i> and 32 trees of <i>Talipariti tiliaceum</i> or <i>Hibiscus tiliaceus</i> (Waru) in MGE-2 has been carried out in April 2019. Furthermore, planting of 38 trees of Bintaro in MGE-2 has been carried out on July 2019.</li> <li>• Monitoring results of water quality measurements in upstream and downstream of Bangko River for several parameters such as BOD<sub>5</sub>, TSS, DO and minerals (ex. Pb, Co, Cd and Fe) in Semester I period 2019 were bellows threshold as required by Govt. Regulation (PP) No. 82 in 2001.</li> <li>• Monitoring monitoring wells on land application (LA) area, non-LA area and housing complexand communities areas for several parameters such as BOD<sub>5</sub>, COD, DO, NO<sub>3</sub>, SO<sub>4</sub>, Cl, Pb, Cu, Cd, Zn and pH in Semester I period 2019 were bellows threshold as required by Minister of Health Regulation (Permenkes) No. 32 in 2017.</li> <li>• During 2018 to 2019, efficiency of by-products usage fibre and shell) for electricity production were ranged from 0.72 to 13.19 lt Diesel per ton CPO produced. Declined of efficiency is spotted in April to May 2018. Regrdng this matter, MGF management informed that since April to May 2018, electricity is supplied by Government Electricity Company (PLN).</li> </ul>	

Apart from chemical fertilizers, organic fertilizers which came from by-products (EFB and palm oil mill effluent) has also applied for nutrient cycle purposes. By-products application was documented in monthly Estate Manager report chapter monthly work realization, realization of manuring report and by-product realization report. EFB dosage recommended were varies about 150 to 200 kg/palm/year in replanting areas and about 250-300 kg/palm/year in mature areas, which depends on field condition. Furthermore, POME applied were about 700-750 m<sup>3</sup>/ha/year which divided into 3 rotation. These matter has verified through observation to Division 4 Block B013 MGE-1 and Division 4 Block C002 MGE-2 for EFB mulching and to Division 3 Block E011 MGE-1 for land application.

**6.5.3**

Calculation of GHG emission and its monitoring for period January to December 2018 has conducted by GSQM Department which current still use Version 3.1, with summaries presented as follows:

**Summary of Net GHG Emissions**

Emissions per product	tCO <sub>2</sub> e/tProduct	Extraction	%	Production	ton/year
CPO	7.28	OER	22.16	FFB Processed	179,101.09
PK	7.28	KER	4.82	CPO Produced	39,670.89

Land Use	ha
OP planted area	10,795.423
OP Planted on peat	3,726.96
Conservation (forested)	21.2
Conservation (non-forested)	-

**Summary of Field Emissions and Sinks**

	Own Crop		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e/ha	tCO <sub>2</sub> e	tCO <sub>2</sub> e/ha	tCO <sub>2</sub> e	tCO <sub>2</sub> e/ha	tCO <sub>2</sub> e	tCO <sub>2</sub> e/ha
<b>Emissions</b>								
Land conversion	96,403.92	8.93	-	-	-	-	96,403.92	8.93
*CO <sub>2</sub> emissions from fertilizer	54,572.79	5.06	-	-	-	-	54,572.79	5.06
**N <sub>2</sub> O emissions	35,314.03	3.27	-	-	-	-	35,314.03	3.27
Fuel consumption	2,040.29	0.19	-	-	-	-	2,040.29	0.19
Peat Oxidation	203,492.56	18.85	-	-	-	-	203,492.56	18.85
<b>Sinks</b>								
Crop sequestration	-72,738.80	-6.74	-	-	-	-	-72,738.80	-6.74
Conservation Sequestration	-194.40	-0.02	-	-	-	-	-194.40	-0.02
<b>Total</b>	<b>318,890.39</b>	<b>29.54</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>318,890.39</b>	<b>29.54</b>

**Summary of Mill Emissions and Credits**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emissions</b>		
POME	31,882.69	0.18
Fuel consumption	577.12	-
Grid Electricity Utilisation	-	-

<b>Credits</b>		
Export of Grid Electricity	-	-
Sales of PKS	-	-
Sales of EFB	-	-
<b>Total</b>	32,459.81	0.18

**Palm oil Mill Effluent (POME) Treatment**

Divert to compost	0.00 %
Divert to anaerobic digestion	100.00 %

**POME Diverted to Anaerobic Digestion:**

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

All data input on GHG calculation through Palm GHG Calculator version 3.1 by the unit of certification has been verified by Auditor with conclusion is satisfactory.

**Status: Comply**

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

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

**6.1.1**

The SIA was conducted in 2010 by Pollito Consultants for Social Impact Management Social Assessment Study Report PT Tunggal Mitra Plantation was submitted in January 2010. The study was conducted by the POLLITO Consultant in November 2009. In the document there are a number of social points of concern for attention going forward are community life patterns, sources of income, communication between stakeholders, potential conflicts, customs, culture, and land disputes. There are several villages that are part of the PT Tunggal Mitra Mitra Plantation Ring I region: Perkebunan Siarang-arang Village, Siarang-arang Village, Pematang Damar Village, Sukajadi Village, Teluk Nayang Village and Pujud Village.

The last study conducted by the company was in 2012. The study was conducted on the Impact of Replanting on the Environment and Social Affairs, PT Tunggal Mitra Plantation, Manggala 1, 2 and 3, Rokan Hilir Regency, Riau Province. The study was conducted by AKSENTA Consultants (Jakarta) in January 2012. The study outlines the replanting stages and indications of the impact of each replanting impact from each stage that can affect the environmental and social conditions, both on the plantation environment around the replanting area, and around plantation. The aim is to identify environmental and social impacts, activities that are sources of impacts, components and or parties potentially affected, choices for mitigating environmental and social impacts. The impact of replanting activities is also outlined in the 2018 Semester I Environmental Management Plan (RKL) and Environmental Monitoring Plan (RPL) Implementation Report.

Impact analysis includes socio-economic and cultural issues of the community around the operational area, job openness, increased accessibility, replanting activities, fire potential, HCV determination and management, and recommendations to reduce negative impacts and increase positive impacts.

In the 2010 SIA POLLITO study, all the assessment processes were carried out through the involvement of the parties, evidence of the recording in the form of a Visum Book from the Pollito Team in the form of Participant Present List during the process of collecting field data in surrounding villages was carried out in 9 to 20 November 2010. In addition, a study on the impact of replanting on the environment and society was carried out by PT Tunggal Mitra Plantation, Manggala 1, 2 and 3, Rokan Hilir Regency, Riau Province. The study was conducted by Aksenta Consultants (Jakarta) in January 2012. The study was conducted by gathering information from workers and the surrounding community. Based on



interviews with the community of Sukajadi Village, it was found that the surrounding community had agreed to carry out the SIA process (during 2010 and 2012), this was evidenced by the participation of the surrounding community at the time of the assessment. Over the past year there have been no new social issues that have developed in the surrounding community caused by operational activities of plantations and factories.

### 6.1.2

In conducting the company SIA study, there were several villages that became PT Tunggal Mitra Plantation's Ring I area including: Siarang-arang Plantation Village, Siarang-arang Village, Pematang Damar Village, Sukajadi Village, Teluk Nayang Village, which are currently divided into Genting and Desa Pematang The form which is currently divided into Sukamulya Village. In collecting data / information done in several ways, including:

- Structured interviews and in-depth interviews with community members who are considered to know the information needed.
- Observation (direct observation) and participatory with the company or community.
- Focus Group Discussion and the parties are given the opportunity to provide input.

The assessment processes have been carried out through the involvement of the parties, evidence has been shown in the form of a Visum Book from the Pollito Team in the form of Participant's Attendance during the process of collecting field data in the surrounding villages which was carried out on 9 to 20 November 2010 A study was also conducted on the Impact of Replanting on the Environment and Social Affairs, PT Tunggal Mitra Plantation, Estate Manggala 1, 2 and 3, Rokan Hilir Regency, Riau Province. The study was conducted by Aksenta Consultants (Jakarta) in January 2012. The study was conducted by gathering information from workers and the surrounding community.

### 6.1.3

PT Tunggal Mitra Plantation has a social impact management and monitoring plan that has been prepared for the period August 2019 – August 2021. The program was prepared based on the results of evaluations of SIA documents that have been carried out (in 2010 and 2012), evaluation of the previous year's management program and the results of consultations with affected parties (surrounding communities, company workers and others). This is done so that the company can always know the development of social impacts that occur in and around operational areas. The management and monitoring program for August 2019 – August 2021 that has been prepared, including:

- Empowerment of religious arts between migrants and local communities
- Organizing sports tournament activities
- Provision and provision of job vacancy information to the surrounding community
- Provision of scholarship programs for high achieving students
- Maintenance of access roads and infrastructure of surrounding villages
- Socialization of HCV areas to workers and surrounding communities
- Providing CSR assistance
- Providing access to the surrounding community to find food without damaging the environment
- Perform replanting activities in accordance with procedures and other management activities

This social management and monitoring plan is formulated with a clear timeline in which the monitoring and management frequency is carried out over an annual period, while the PIC responsible for the social aspects is the estate manager, head of office, assistant, and senior assistant.

In carrying out the management and monitoring program to mitigate social impacts caused by operational activities, the company has carried out well-documented realization, including:

- Realization of CSR activities to the communities in the villages around the affected companies.
- Providing scholarships to outstanding students from the community and children from workers.
- Promulgation of HCV protection to workers and surrounding communities.
- Providing socialization of fire management and prevention to the surrounding community and other realizations.

The company has a PT Tunggal Mitra Plantation negative impact management program for the 2019-2021 period that has been scheduled and has a PIC responsible for that. The preparation of the program is based on the results of consultations with the surrounding community through a questionnaire with 50 respondents from 6 villages, namely the Villages of Perkebunan Siarang-arang, Siarang-arang, Pematang Damar, Sukamulya, Sukajadi and Pematang Genting.



Consultation activities to the surrounding community using questionnaires were carried out on August 13, 2019. In addition to conducting consultations through questionnaires to the community, the company also gave the questionnaire to its workers, union officials and others conducted on August 13, 2019 to 7 respondents. CH has been implemented the social management plan in 2018-2019 such as, providing information on job vacancies, carrying out roadwork's, collaborating with local contractors, procuring religious / sports activities with the surrounding community and others.

**6.1.4**

PT Tunggul Mitra Plantation has a Negative Impact Preparation Procedure No. SPO / 038 / PPDN / XI / 18 dated November 1, 2018 which describes the PIC responsible for conducting consultations with surrounding communities and affected parties is KTU (Head of Administration), Senior Assistants and PSQM. The consultation is carried out using the socio-economic questionnaire form at least once every 1 (1) year and the person responsible for carrying out the analysis is Estate / Mill Manager.

The last evaluation of the SIA was carried out by the company in 2019 involving the participation of affected communities, contractors, workers, labor union officials and others. The involvement of the affected parties was carried out by giving consultations using questionnaires given to the relevant respondents. This was done on 13 August 2019 with 50 respondents coming from external parties (villagers, contractors and others) and 7 respondents from internal parties (workers, union officials and others). The results of the evaluation are as many as 66% of respondents stated the existence of the company had a very positive impact and 26% of respondents suggested giving a quite positive impact on the socio-economic aspects of the surrounding community. There are changes compared to the management plan and social monitoring for the 2018 period, for the management plan and social monitoring for the 2019-2021 period, the company has added a social management and monitoring plan for internal stakeholders, for example related to aspects that cause an impact on employee income and employee welfare. The company has conducted management evaluation and social monitoring in 2019 for the previous period, the result is a positive assessment of the implementation of the previous period's social management from the surrounding community and there are some additional impacts that are felt need to be added in the management of the following year namely the impact of employee income and employee welfare.

**6.1.5**

PT Tunggul Mitra Plantation until the time the Surveillance-1.4 assessment was carried out did not have a smallholder scheme.

**Status: Comply**

**6.2**

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

**6.2.1**

The company has a communication / consultation SOP with the community No. The RSPO / 6.2 / KKM document which was revised on August 1, 2016 is written in an easy-to-understand language, Indonesian. The SOP explains the guidelines for communicating and consulting with the community. The SOP explains:

- If there is something that is communicated / consulted by the community, then the community gives a letter to the unit through the administration section.
- You must record the letter in the register of communication / consultation with the community and the unit manager will re-analyze the letter from the community.
- If the letter is still within the authority of the unit manager, the unit manager immediately makes a decision on the letter and if it is outside the unit manager's authority, the unit manager submits the letter to GM.
- If approved by GM, the unit manager will respond to the community no later than 30 days
- If there is something that will be conveyed by the community company, the company will make a letter addressed to the community through the village head
- The response for community letter will be answer by the unit no later than 30 days
- If there is no agreement found in the consultation there will be a joint discussion.

Based on interviews with the community of Sukajadi Village, it is known that the community does not object to the communication and consultation procedures that are owned by the company, because these procedures have been deemed quite easy and are always socialized to the village every year so that it makes it easier to communicate.

**6.2.2**

The company has presented the Decree on the Establishment of Communication and Public Consultation Officer No. 273B / MGE-SK / IX / 2016 on September 1, 2016. The communication and consultation officers appointed to carry out the communication include:

- Head of Administration in MGE-1
- Head of Administration in MGE-2
- Head of Administration in MGE-3
- Head of Administration in MGF

Based on the results of interviews with the surrounding community, it is known that the village has known and has a designated PIC contact (Head of Administration) as an intermediary in terms of communication and consultation. Usually communication and consultation are done through correspondence, in person or via telephone.

**6.2.3**

The company has a stakeholder list that has been detailed in several sections according to its type and the list has been updated every year. The latest stakeholder list update was carried out on July 1, 2019 with the following details:

- List of Local Governments of 17 stakeholders
- List of Contractors / Suppliers / Contractors with 11 stakeholders
- List of Schools with 11 stakeholders
- List of Hospitals / Taxes / Banks / Social Security as many as 10 stakeholders
- List of NGOs / internal & external organizations of 10 stakeholders
- List of Community Leaders around 6 stakeholders
- List of Previous Land Owners as many as 2 stakeholders

The company documents all forms of communication with stakeholders including well-documented notes and inputs recorded in the In and Out Letters Book. Based on the results of the study of outgoing and incoming mail book documents, it is known that during the last year there were no requests for information or input from stakeholders, letters received by companies were usually only in the form of requests for financial assistance, activity proposals and invitation letters.

**Status: Comply**

**6.3**

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

**6.3.1**

There are two procedure regarding to complaint handling as follow:

- Community Handling Complaints Procedure (PKM, Rev. 01, and 1<sup>st</sup> August, 2016) including Community Complaint Handling Flow Chart.
- Employee's Complaints Handling Procedure (RSPO / 6.5 / PKK, dated July 28, 2009) including Employee Complaints Handling Flow Chart.

Complainant are free to submit their claims, complaint, grievance, bribery or corruption to the company representatives. This procedure was explained that the company will protect the whistleblower and there are no sanction for them. When the cases did not handled enough in estate unit, the cases will continue to next level of management, including to jurisdiction level or another way, based on the agreement each parties. These procedure was added with flow chart in form of Complaint Handling Data. If the community not satisfied with the response from the company, they can continue the complaint through the complaints system RSPO (Point 5.9) Grievances included anonymous and whistleblower cases can be submitted through the suggestion box where suggestion boxes checked by officer in charge regularly.

Commitment to protect whistleblower also stated on Sime Darby Responsible Agriculture Charter that released on September 2016. In clause Corporate Integrity Commitment stated that Sime Darby Plantation "Providing an internal

*mechanism for reporting and investigating any claims of dishonesty, bribery or corruption, and outlining how whistleblowers are protected from negative repercussions”.*

Based on public consultation with village representatives from *Suka Jadi* and *Desa Perkebunan Siarang – arang* well-known that there is no complaint/grievance regarding to company’s operation or any other dispute. There is no record of complaint/grievance from those respective stakeholder since 2018 until this audit.

**6.3.2**

Based on document verification, the company has had procedure to document all the complaint from respective stakeholder. For internal stakeholder, log book of complaint are in place. During January 2019 until this surveillance audit found some complaint such as house damage, delays in rubbish transporting etc.

On the other hand, the company also had complaint log book from external stakeholder (local communities, government agencies, NGO’s, contractors, buyers etc). Based on public consultation with village representatives from *Sukajadi* and *Desa Perkebunan Siarang – arang* known that there is no complaint/grievance regarding to company’s operation or any other dispute. There is no record of complaint/grievance from those respective stakeholder since 2018 until this audit.

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 and 6.4.2**

PT. Tunggal Mitra Plantation has had Procedure of Land Acquisition in Occupation Area (Document Number 343 / PSD-OKUP / 11) signed by Head Plantation Upstream Indonesia dated 22 June 2012. These procedure explained that the compensation of land occupation process will began by land owner identification. The measuring result with GPS identification and Technical Feasibility Survey by the Department of Minamas Research Centre (MRC) will follow up with negotiation for land compensation by the owner. The Plantation Services Department/PSD Manager and Estate Manager will handle these process and witnessed by the head of village and related parties.

The Procedure of Land Acquisition in Occupation Area is a guidance for land compensation process. The documents requirement in land compensation shall signed by land owner, management unit representative, head of subdistrict, notary and head of village. These documents shall equipped with photograph, map, statement letter of land release by the owner, official report was signed by related parties consist of land owner and management unit representative, witnessed by head of village and subdistrict. The process of payment for land or land compensation shall completed with receive and photograph as documentation evidence. Based on stakeholder consultation in *Sukajadi* and *Perkebunan Siarang-arang* Village that known the last land compensation process was conducted on 1997 and the parties had accepted the compensation process.

**6.4.3**

Based on document verification and public consultation with village representatives from *Sukajadi* and *Perkebunan Siarang – Arang* village known that there is no new land expansion. There is also no information of land dispute at this time.

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 and 6.5.2**

The company has work regulations that have been applied in the companies listed in the Collective Labor Agreement (CLA) for 2018-2020. The Collective Labor Agreement has been agreed by the plantation companies which are incorporated in the Sumatran Plantation Company Cooperation Agency (BKS-PPS) with the Labor Unions of the Members of the Indonesian Agricultural & Plantation Labor Union Workers Union (PP.FSP.PP.SPSI) agreed on April 9, 2019. The CLA was also registered with the Ministry of Manpower in accordance with Decree No. B.319 / PHIJSK / X / 2018 dated October 26, 2018 concerning the Signing of CLA. In the CLA explained about the Environmental Applicability of the

Collective Labor Agreement, Organizational Recognition, Work Acceptance, Working Time, Wages, Working Volume, Assistance to sick days, absenteeism, payment of meal and mandatory money, overtime work hours and overtime work wages, Provisions - Provisions Regarding Premiums, Assistance Withheld by the State, Allowances for Religious Holidays and Bonuses, Social Security and Social Assistance, Work Equipment, Occupational Safety and Health, Old Age Security, Workers brought in from outside the region, Termination of Employment, How to resolve disputes employment and strikes.

The Collective Labour Agreement has been explained by the company with socialization to workers. It has been confirmed with the documentation of Collective Labour Agreement socialization that take place with socialization of company policy in 08 February 2019.

The interview result with gender committee, labour union and workers in the field, the workers has been know about their rights/obligation in the company such as salary, deduction, insurance, leave, and the other rights/obligation.

There has been change in workers policy such as minimum wage from 2018 to 2019, wage structure & scale in 2019, and the others. The workers policy change always been socialized to workers in the muster morning days after the change has been ratified.

The deduction/penalty it written in the company memorandum and has been socialized by company to workers. Based on the interview with harvesting workers, labour union and the others workers it has been know about deduction in the company memorandum and it has been socialized to workers.

The company has set a minimum wage that refers to the stipulation of the minimum wage set by the government, namely the Regency / City Minimum Wage in Riau Province in 2019 of IDR. 2,707,384.96 in accordance with Riau Governor Decree No. 949 / XI / 2018 dated November 21, 2018 and came into force on January 1, 2019. In addition to referring to government regulations, the company also sets minimum wages that are higher than stipulations, based on mutual agreement with *GAPKI* Riau Branch, *BKS-PPS* and *SPS* on February 13, 2019 which stipulates that the Riau Province Plantation Sector Minimum Wage is IDR. 2,820,000 and applies as of January 1, 2019.

In addition to setting the minimum wage from the government, the company also has a minimum wage setting based on these regulations, namely:

- Inter Office Mail No. 029 / HRM-i3 / III / 2019 dated March 26, 2019 regarding the 2019 Wage permanent worker for PT Tunggal Mitra Plantation amounting to IDR. 2,820,000 (basic salary of 2,679,000 and the amount of rice in the amount of IDR. 141,000), valid since January 1, 2019 and if absentee workers will be subject to a discount of IDR. 107,160, - / day.
- Inter Office Mail No. 013 / HRM-i3 / IV / 2019 dated April 1, 2019 concerning Wages permanent worker and Salary Structure in 2019 PT Tunggal Mitra Plantation, which took effect on January 1, 2019 with the lowest wage (basic salary) with a G1 group of IDR. 2,732,060, - and the highest wage (basic salary) with group A8 of IDR. 3,578,800.

Based on the results of the review of employee wage documents in the estate and mill, it is known that the company has implemented provisions relating to the minimum wage for all existing workers. This is reinforced by the results of interviews with harvest workers, sprayers and mill operators who stated that the wages given were in accordance with the minimum wage stipulations of the government.

Based on the results of document review and interviews with labor unions and gender committees, it is known that during the last year there have been no cases of violations or issues of violations related to the provision of wages or unfair conditions to workers. Complaints received by the union and the company from the workers more related to the condition of housing that is damaged and it has been handled quite well by the company by providing a quick response in fixing it.

For now the company only cooperates with local contractors only for transportation of CPO, FFB and Empty Bunch. Regarding the contractor workers' wages by the contractor, they are only applied by local contractors for CPO activities, where the wage of contractor workers in July 2019 has been higher than the minimum wage set. Whereas for local contractors FFB and Empty Bunch transportation activities are carried out by individuals and do not have workers (the contract holder is the person who does the work). Company workers are 1,471 people and contractors (PT Mitra Karya Jaya Perdana) are 121 people (90 office workers and 31 CPO transport drivers).

The company has workers with contract worker status who work with 32 workers in Manggala 1 Estate and 15 workers in Manggala 2 Estate. Of all contract worker is there are 32 contract worker who work as Scout Harvesting in Manggala 1 Estate and 9 workers in Manggala 2 Estate. Workers with contract worker status who work as Scout Harvesting have a work agreement with the company as a harvester. The reality on the ground is that the company hires the worker as Scout Harvesting and is not the main job as a harvester. The company has the opportunity to ensure that the types of work listed in the temporary work agreements are in accordance with the actual work in the field. **(OFI in indicator 6.5.2)**

**Non-Conformity No. 2019.03 with Major Category**

**Evidence Observed:**

Based on the results of field observations at Manggala 2 Estate found 3 people who were doing quotes lose fruit picker. From the interview results it is known that these 3 people are the wives of harvesters who work in the company but are not registered as employees and / or have a company working relationship.

**Non-Conformance Description:**

The company has not been able to show that policies related to the prohibition of hiring employees without work ties have been implemented and monitored properly.

**6.5.3**

The company has an inventory of welfare facilities in the form of housing for its workers in each unit according to their needs. The following are housing facilities available in each unit, including: Employee Homes (G1, G2 and G6), Water Storage Tanks, Electrical Installation, Employee Hall, Polyclinic, Employee / Guest Mess, Mosque, Mosque, Church, School, School Bus and others.

Based on the results of field visits at the housing estate of the plantation and factory employees and conducting interviews with the residents, it is known that there are currently many houses which are semi-permanent G2 buildings that were built in 1993-1998 and up to now are still inhabited by workers. Resident of the housing states that the house occupied is still suitable to live in and if there is damage to parts of the house it will be reported to the company through foreman 1 which will later be submitted to the company. So far, reports / complaints related to house damage have always been responded to properly by the company and carried out repairs. There is some evidence of complaints and improvements made by the company based on the request, including:

- Complaints on February 02, 2019 about bathrooms that have been damaged and asked to replace the toilet. This was responded to by the company on the same day and made improvements 2 days later, on February 4, 2019.
- Complaints on June 16, 2019 regarding broken roofs and being asked to be repaired. This was responded to by the company on the same day and made improvements 2 days later, on June 18, 2019.

The company has been trying to build new permanent houses to gradually replace existing semi-permanent houses since 2018. This has also been known by workers and for now workers still hope that the construction of permanent houses can be realized all in the next few years.

**6.5.4**

The company has made it easier for workers and their families to obtain food sources by providing employee cooperatives that sell the daily needs of workers and provide access to vegetable traders to sell in the workers' housing area. In addition there are also workers who open small business stalls to sell daily necessities in each housing.

Based on interviews with workers, labor unions and gender committees, it is known that workers have no difficulty in getting food sources because the company has provided cooperatives that sell daily necessities and there are vegetable vendors who are given access to sell at home. In addition, workers can buy these needs into markets around the area of the company with access that is not too difficult.

<b>6.5.1</b>	<b>Status: Non-Conformity No. 2019.03 with Major Category</b>
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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 and 6.6.2**

PT Tunggal Mitra Plantation has a policy that respects the rights of all employees to form and join the Labor Union community, which is contained in SOP Guidelines for Sustainable Plantation Management No. Policy 724 / TQEM-SPMS / 09 dated 27/08/2010 Policy and Objectives Chapter of the Indonesian Plantation Upstream Policy Section on Social Policy page 13 Point 5 explaining that the company is expected to respect the rights of all employees to form and join the Union community Workers in accordance with their choices and negotiate together.

The company already has active labor unions in each unit which is the Management Unit of the All Indonesia Workers Union Work Unit (PUK-SPSI). The union already has a legal basis for organizing in accordance with applicable government regulations and has been registered with the Rokan Hilir Regency Manpower Office as an official union. These unions include:

- PUK-SPSI Manggala 1 Estate that has been registered at the Rokan Hilir Regency Labor Office with registration no. 06 / SP-ROHIL / DTK / VI / 2002 dated June 25, 2002 with the composition of the board being Gojali Harahap who serves as chairman and is assisted by vice chairman, secretary, treasurer and vice treasurer.
- PUK-SPSI Manggal POM which has been registered at the Rokan Hilir Regency Labor Office in accordance with Decree No. Kep.016-SK / PC-FSPPP / SPSI / ROHIL / 05/2017 dated May 9, 2017 with the composition of the board is Mangapul Rumahorbo who serves as chairman and is assisted by vice chairman, secretary, deputy secretary and treasurer.

The company has documented all internal labor union meetings and bipartite meetings between the company and the union, including:

- A meeting between the union and company management on 13 August 2019 which discussed the granting and use of workers' entertainment funds in 2019 at Manggala 1 Estate which was attended by 11 participants.
- A union meeting with company management on May 23, 2019 that discussed the awarding of bonuses for all company workers in the July - December 2018 period, which was attended by 15 participants.
- An internal union meeting held on August 6-07, 2019 at the Mona Plaza Hotel discussed the 5th SPSI regional meeting which was attended by all SPSI management representatives in the company.
- A meeting between the union and company management on 23 August at Manggala 3 Estate which discussed the Riau Province minimum wage, proposed the existence of a sentry housing, carried out monthly cleaning activities and other discussions attended by 22 participants.

Based on interviews with labor union representatives, it was found that the company gave workers full freedom to carry out the formation and election of labor union management. The company also ensured that the election had no interference in its implementation and for the current management were workers with the status of foreman below that in order to avoid conflicts of interest.

**Status: Comply**

**6.7**

**Children are not employed or exploited.**

**6.7.1**

PT Tunggal Mitra Plantation has a Sustainable Plantation Management Guideline (No Policy 724 / TQEM-SPMS / 09) which regulates Social Policy. In point 6 it states that Plantation Upstream Indonesia does not utilize underage workers (children). In addition, the company has a Memorandum from Head Plantation Operations No: POD-UM-052 / III / 2010 dated March 24, 2010 regarding child protection policies, in which companies prohibit the use of underage workers according to the Indonesian Labor Law.

Based on the results of the document review, it is known that the youngest worker currently born in 1999 joined the company in 2019, so there are no workers younger than 18 years working in the company. This is consistent with the results of interviews with labor union representatives, harvesting, spraying and maintenance workers. It is known that there are no workers who come to work under the age of 18 because the minimum age for workers is 18 years and has an identity card.

**Status: Comply**



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

**6.8.1; 6.8.2 and 6.8.3**  
 The company has a policy of non-discrimination and equal opportunities in employment. The policy on equal opportunities and treatment for obtaining employment opportunities is contained in the SOP for Sustainable Plantation Management Guidelines issued by Minamas Plantation Indonesia (No. Policy: 724 / TQEM-SPMS / 09) page 13 which includes company policies on equal opportunity and treatment in employment opportunities stated in point 1 which states that: All Staff / Employees must be treated fairly and fairly in matters relating to recruitment, progress, conditions and description of work, regardless of race, degree, ethnicity, gender, skin color, imperfection (disability), sexual orientation, organizational membership, political views, religion and age. Specifically, this policy aims not to discriminate against sex, race or ethnicity, disability, sexual orientation, age or trust; but to develop a global workforce that has the ability based on objective assessment.

To ensure the implementation of the auditor's review of the employee registration document, it is known that the workers recruited have diverse educational, ethnic and religious backgrounds. Also based on field observations it is known that workers come from a variety of ethnicities, religions, races, and genders.

Based on interviews with workers, labor unions and gender committees, it is known that the recruitment of workers is based on the needs of the company regardless of ethnic, religious, racial and group background. All prospective employees are entitled to the opportunity to work according to their scientific background and company needs. During 2018-2019 there were no issues regarding discrimination against workers. Recruitment of workers in 2019 is carried out based on skills, capabilities, qualities and health conditions, this is evidenced by the existence of performance assessment documents, interviews, and results of health checks for each prospective employee applying for a job. In addition, the results of interviews with the village community around the company also found that so far there had not been any acts of discrimination within the company or its surroundings. The company also always provides equal opportunities to the surrounding community to work in the company in accordance with the provisions and requirements set.

**Status: Comply**

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

**6.9.1; 6.9.2 and 6.9.3**  
 The company has a policy on the prevention of sexual harassment and violence that is listed in the SOP for Sustainable Plantation Management Guideline No. Policy 724 / TQEM-SPMS / 09 dated 27/08/2010 Policy and Purpose Chapter, Plantation Upstream Indonesia's Policy Section on Social Policy point 4, namely developing and implementing policies to protect female workers from crime and sexual harassment and protect the rights that are related to reproduction.

The policy has been socialized to workers every year by the company and socialization is routinely carried out by gender committees in each unit when "posyandu" and monthly gender meetings are held. Policy socialization has been carried out by the company, for example the policy socialization on January 10, 2019 to female workers in Manggala 1 Estate. The company also has a gender committee in each unit that is still active today. The current gender committee consists of the chairperson, secretary, maternal & child health section, work safety section, domestic violence section and women's role section.

The company has a SOP on Community Complaints Handling (PKM, Rev. 01, in August 1, 2016) which is equipped with a Community Complaints Handling Flow Chart. In addition there is also the SOP for Grievance Handling for workers (RSPO / 6.5 / PKK, dated July 28, 2009) Employee Complaints Handling Flow Chart. The SOP explains the mechanism for handling existing complaints, and in the SOP it has been explained that the confidentiality of the reporter will be guaranteed. Complaints can be submitted to the assistant directly or through their respective supervision and if women workers want to submit their complaints it can also be through a gender committee.

Based on interviews with the gender committee it is known that socialization is always carried out, the mechanism for submitting complaints / reporting related to sexual harassment / violence, and socialization regarding the rights of workers, especially women. The socialization is usually carried out in conjunction with meetings of the gender committee with workers, at the PKK meeting and at the posyandu conducted for women workers and housewives. in addition, in the past year there have never been any issues / incidents related to sexual harassment that occurred in the company's operational areas.

	<b>Status: Comply</b>	
<b>6.10 Growers and mills deal fairly and transparently with smallholders and other local businesses.</b>		
<b>6.10.1; 6.10.2; 6.10.3 &amp; 6.10.4</b> Until the Surveillance 1.4 assessment is conducted, the company has no collaboration with smallholders or suppliers to purchase FFB so the company has no information related to current FFB prices. All FFB processed in Manggala POM are FFB derived from the main estate, namely Manggala 1 Estate, Manggala 2 Estate and Manggala 3 Estate.  The company does not have an agreement with the smallholders or with FFB suppliers, but the company has a partnership with a contractor to cooperate in the operations of plantations and factories. Based on the results of interviews with contractors, it is known that the company always runs a partnership based on work agreements that have been agreed by both parties. In addition, the company has routinely paid the completion of workers in accordance with the time specified in the agreement and so far there has been no delay in this regard.		
	<b>Status: Comply</b>	
<b>6.11 Growers and millers contribute to local sustainable development wherever appropriate.</b>		
<b>6.11.1 &amp; 6.11.2</b> The company has a CSR program in 2019 for the surrounding community that has been prepared for each work unit. The CSR program is divided into various fields, namely Education, Environmental, Health, Economic, Religious and Social and Cultural. The preparation of CSR programs has been based on the results of identifying community needs by conducting questionnaires in order to find out what is needed by the community. The last questionnaire was conducted in June 2018 for Siarang-arang Village, Perkebunan Siarang-arang Village, Sukajadi Village, Sukamulya Village and others as many as 50 respondents.  The company can show the realization of CSR programs that have been prepared and intended for the surrounding village community in accordance with their targets, which are shown with proof of realization in the form of photos, minutes and other evidence. Based on the results of interviews with the surrounding village community, it is known that so far the company has carried out CSR activities in each village and the village community has felt that it is sufficient to assist the development and growth of village communities. In addition, there are also many villagers who work in the company and information related to job vacancies is always given to the surrounding community when the company needs workers.		
	<b>Status: Comply</b>	
<b>6.12 No forms of forced or trafficked labour are used.</b>		
<b>6.12.1; 6.12.2 and 6.12.3</b> The company has a policy regarding forced labor or labor trafficking, namely through a Social Policy signed by the Head of Plantation Upstream Indonesia, December 2011. It is not allowed to use forced labor or underage workers (children). Based on employee data in 2018, workers come from the surrounding community and outside the area with recruitment within the company in accordance with procedures owned by the company.  Based on the results of the study of work contract documents and a list of workers, it is known that there are no foreign workers who work at the level of implementing workers up to the manager's position. Foreign workers only exist at the top management level. In addition, there are no workers from trade or illegal workers or contract substitution because all workers have a working relationship with the company. This is in line with the results of interviews with harvest, fertilizer, spray and factory operator workers who stated that so far no use of forced labor, child labor, or family members who helped employees. All workers have work ties with the company.  Based on site visits and interviews with management, workers and labor unions, it is known that there are no illegal, foreign or forced laborers employed by the company.		
	<b>Status: Comply</b>	

**6.13**

**Growers and millers respect human rights**

**6.13.1**

The company has a policy to respect human rights through Memorandum number: 067 / SOU-16 / VIII / 2015 from the Chairman of SOU 16 Manggala on August 24, 2015. The human rights policy contains:

- Trying to protect the rights of every employee to live, maintain life, improve living standards, form a harmonious and religious family.
- Provide opportunities for each employee to communicate and obtain information needed to develop their personal and social environment.
- Give employees the freedom to express opinions form and join labor unions according to choice.
- Communicating and explaining human rights policies so that they can be understood and understood by each employee, including contractors and or other relevant parties.

To communicate the policy, the company did it in the form of socialization that was carried out at muster morning. The following are examples of socialization that have been carried out by companies related to these policies:

- The socialization of the Company Policy (human rights policy) on February 14, 2019, which was attended by 427 participants.
- The socialization of the Company Policy (human rights policy) on February 20, 2019 which was attended by 351 participants.
- The socialization of the Company Policy (human rights policy) on February 8, 2019 attended by 438 participants.
- The socialization of the Company Policy (human rights policy) on February 13, 2019 to local contractors attended by 15 participants.

Based on the results of interviews with representatives of labor unions, harvest workers, spray and maintenance it is known that the workers are aware of policies related to the company's human rights and so far there are no actions / issues related to human rights violations within the company. This is evidenced by the absence of complaints related to human rights issues from workers and from the surrounding community.

**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**

Until this assessment, PT TMP did not expand the new plantation. There is only replanting activity that began in 2012.

**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.**

Until this assessment, PT TMP did not expand the new plantation. There is only replanting activity that began in 2012.

**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**

*Until this surveillance audit (ASA-1.4) known that PT. Tunggal Mitra Plantation did not have new land expansion.*

Sime Darby Plantation has sent Land Use Change Analisis (LUCA) is sent to the RSPO Secretariat on 28 August 2016 with the attachment of the letter included the calculation LUCA PT Tunggal Mitra Plantation (CH) and has received responses from RSPO Secretariat on 9 January 2019.

Based on document review PSQM Department attending BHCV WG Meeting and the WG has agreed this NCR will be closed by RSPO Secretariat, that means growers are given graces period for a year to close the issue RSPO Secretariat will inform all CBs soon on this matter (the email on 09 August 2017).

Sime Darby resubmitted LUCA to the RSPO secretariat on August 27, 2018. Sime Darby also sent an e-mail dated September 5, 2018. Based on email from RSPO Head of Certification on 23 May 2019 stated that *"The RSPO secretariat has agreed to allow the NC raised on 7.3.1 to Sime Darby's units to be opened until the next ASA. Please proceed with the necessary process of certification"*.

Based on the statement above, indicator 7.3.1 raised as NC. Status of conformity will be a part of assessing in the next assessment (Recertification).

**7.3.2; 7.3.3; 7.3.4; 7.3.5**

Until this surveillance audit (ASA-1.4) known that PT. Tunggal Mitra Plantation did not have new land expansion.

<b>7.3.1</b>	<b>Status: Non Conformity indicator Major No. 2019.04</b>
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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**  
Until this assessment, PT TMP did not expand the new plantation. There is only replanting activity that began in 2012.

	<b>Status: Comply</b>
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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**  
Until this assessment, PT TMP did not expand the new plantation. There is only replanting activity that began in 2012.

	<b>Status: Comply</b>
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**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**  
Until this assessment, PT TMP did not expand the new plantation. There is only replanting activity that began in 2012.

	<b>Status: Comply</b>
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**7.7 Use of fire in the preparation of new plantings is avoided other than in specific situations, as identified in the ASEAN guidelines or other regional best practice.**

**7.7.1 & 7.7.2**  
Until this assessment, PT TMP did not expand the new plantation. There is only replanting activity that began in 2012.

	<b>Status: Comply</b>
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**7.8 New plantation developments are designed to minimise net greenhouse gas emissions.**

**7.8.1**  
Until this assessment, PT TMP did not expand the new plantation. There is only replanting activity that began in 2012.

	<b>Status: Comply</b>
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**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.**

**8.1.1**

**Internal Audit RSPO**

Annual RSPO internal audit by GSQM-Sustainability Department had conducted in 20-28 May 2019. Internal audit mentioned that there were 4 major and 3 minor of P&C; and 3 NCR on SCCS findings which all were fully complied by PT TMP on 20 August 2019. The results was signed by Head of Sustainability and all Managers of PT TMP. They also audited the contractor, however only in document such as contract and license of the contractor worker.

Based on document review and observation to the field, it was known that there is no new innovation regarding BMP, OSH, GHG dan hazardous management aspects.

**Status: Comply**

**3.2. Summary of Assessment Report of Supply Chain Requirement**

**3.2.1. General chain of custody requirements for the supply chain**

Clause	Requirement																		
<b>5.1</b>	<b>Applicability of the general chain of custody requirements for the supply chain</b>																		
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>General Chain of Custody applied in mill/supply bases and bulking. Supply bases as follows:</p> <ul style="list-style-type: none"> <li>• Manggala 1 Estate</li> <li>• Manggala 2 Estate</li> <li>• Manggala 3 Estate</li> </ul> <p>Delivery of product (CPO) to the bulking or renting storage is also taken over by mill.</p>																		
	<b>Status: Comply</b>																		
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>Facility only received and processed FFB from the certified sources. There is no trading activity by mill.</p>																		
	<b>Status: Comply</b>																		
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>Manggala POM – Sime Darby Plantation, subsidiary of Sime Darby Plantation Bhd has registered in RSPO membership 1-0008-04-000-00 since 7 September 2004.</p> <p>Manggala POM has been registered in IT platform palm trace RSPO <a href="https://palmtrace.rspo.org/web/rspo/member-directory">https://palmtrace.rspo.org/web/rspo/member-directory</a> which information as follows:</p> <ul style="list-style-type: none"> <li>• Member Name: Sime Darby Plantation - Manggala POM, PT. TMP</li> <li>• Account UID: RSPO_AC1000000339</li> <li>• Core Product: Palm Oil</li> <li>• Member ID: RSPO_PO1000000330</li> <li>• Type of Business: Oil Mill</li> </ul> <p>For example: there is some record of shipping announcement on palm trace</p> <p><b>Stock Transactions</b></p> <table border="1"> <thead> <tr> <th>Stock Transaction ID</th> <th>Date</th> <th>Product</th> <th>Supply Chain Model</th> <th>Transaction Type</th> <th>Volume</th> </tr> </thead> <tbody> <tr> <td>ST-TR-6ccc1de9-8043</td> <td>20-08-2019</td> <td>CSPO</td> <td>IP</td> <td>Credit Allocation</td> <td>38.067</td> </tr> <tr> <td>ST-TR-7db3ce80-754b</td> <td>20-08-2019</td> <td>CSPK</td> <td>IP</td> <td>Remove From Certified Stock</td> <td>6.154,4</td> </tr> </tbody> </table> <p><i>*Volume in MT</i></p>	Stock Transaction ID	Date	Product	Supply Chain Model	Transaction Type	Volume	ST-TR-6ccc1de9-8043	20-08-2019	CSPO	IP	Credit Allocation	38.067	ST-TR-7db3ce80-754b	20-08-2019	CSPK	IP	Remove From Certified Stock	6.154,4
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Finalized Transactions								
Transaction ID	Transaction Date	Buyer Reference Number	Product	Volume	Supply Chain Model	Quality	Transaction Type	Status
TR-120db790-d4bb	08-08-2019		CSPK	348,34	IP		Shipping	Confirmed
TR-0bbd3047-5c87	18-07-2019	9100052877	CSPK	499,89	IP		Shipping	Confirmed
TR-879acb2f-d97d	08-07-2019	9100051497	CSPK	400,08	IP		Shipping	Confirmed
TR-623fe16c-5db0	28-01-2019		CSPK	299,23	IP		Shipping	Confirmed
TR-1138f1a3-37cd	28-01-2019		CSPK	498,82	IP		Shipping	Confirmed
TR-202593b5-ee38	18-09-2018		CSPK	546,65	Segregation		Shipping	Confirmed
TR-cf7a2e56-9622	18-09-2018		CSPK	596,91	Segregation		Shipping	Confirmed
TR-831f8923-d5b1	18-09-2018		CSPK	842,75	Segregation		Shipping	Confirmed
TR-71c875a8-1702	25-04-2018		CSPK	794,67	IP		Shipping	Confirmed
TR-4fac4029-a03e	21-03-2018		CSPK	747,97	IP		Shipping	Confirmed
TR-7939cabd-29f0	22-02-2018		CSPK	829,21	IP		Shipping	Confirmed
TR-3429f2e6-5cb4	25-01-2018		CSPK	798,63	IP		Shipping	Confirmed
TR-e1ce3dff-938f	25-01-2018		CSPK	199,28	IP		Shipping	Confirmed
TR-856e22a3-8011	16-01-2018		CSPK	797,13	IP		Shipping	Confirmed
		<b>Status: Comply</b>						
<b>5.1.4</b>								
Processing aids do not need to be included within an organization's scope of certification.								
There is no processing aids in the operational Manggala POM.								
		<b>Status: Comply</b>						
<b>5.2</b>		<b>Supply chain model</b>						
<b>5.2.1</b>								
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.								
Until this assessment, Manggala POM consistently implemented Identity Preserved module when they only received raw material from certified area which is Manggala 1, Manggala 2 and Manggala 3 Estate. During this certification period, there was no record of FFB from noncertified source processed in Manggala POM. Therefore, mill implemented Module D – Identity Preserved.								
		<b>Status: Comply</b>						
<b>5.2.2</b>								
The site can use one (1) or a combination of supply chain models as audited and certified by the CB.								
Until this surveillance audit, Manggala POM only using identity preserved module.								
		<b>Status: Comply</b>						
<b>5.3</b>		<b>Documented procedures</b>						

**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.

Facility has RSPO SCCS Manual- RSPO Supply Chain Certification Standard No. SCCS-Std/RSPO/PSQM/03 dated on 01 March January 2019. The scope of RSPO Supply Chain System: FFB Certificate processing from raw material acceptance to storage and delivery process produces Certified Sustainable Palm Oil (CSPO) and CSPK with module D (IP) both physical and office administration. The summary of this procedure were explain on below points:

- 4.2.1. The procedure is documented
- 4.2.2. Internal audits are conducted at least annually to ensure: the organization complies with RSPO SCCS requirements and RSPO Market Communication & Claim documents. Where the internal audit is done at least 2 months before the external audit. The internal audit results are included in the management review conducted at least once a year.
- 4.3. The Mill ensures the purchase of incoming goods, however the marketing division in Jakarta's is responsible for checking the validity of supplier certificates, licenses for traders and distributors.
  - 4.3.2. The Unique code/ unique identification number aims to ensure that products are sold through quality tests and can be traced back to the beginning of the process.
- 4.5. Third party activities (outsourcing)
- 4.6. Sales and goods out
  - Units that need to make announcements and trade confirmations in the RSPO IT Platform, this should also include making shipping announcements (each shipment/shipping group by the marketing division). Certified products sold through other schemes or conventional means or in case of lack of production, lost or damaged shall be removed.
- 4.8. Training → The training plan for RSPO SCCS requirements process should be reviewed continuously/annually.
- 4.9. The record keeping
  - The record keeping of all documents are minimum 10 years for financial report documents and transactions; and minimum 2 years for data other than financial documents.
- 4.10 Conversion Factor
  - Conversion value is determined by marketing division in Jakarta, based on data sent by Mill on the basis of the resulting of FFB processing, so that the conversion value obtained is the same as the actual obtained by the Mill, and the conversion reference by marketing follows the mill manager monthly report period.
- 4.11. Claim pursuant to RSPO communication and claim.
- 4.12. Complaint
  - Stakeholders may complain by email or face directly to the management representative. The complaint should be handled no later than one month after the complaint is received. Especially for complaints related to salary rights, incentive benefits, product complaints, and payments is should be acted upon no later than 14 days after the complaint has been received. All complaints and responses should be recorded.
- 4.13. Management review
  - Management review plan is established: after internal audit, before external audit checks and minimally done once in twelve months /one year.
  - Input for management review should include information: internal audit results of SCCS requirements, production achievements, customer feedback, preventive and corrective action status, follow up on review management, changes that may affect system management and improvement recommendations.

**Status: Comply**

**5.3.2**

The site shall have a written procedure to conduct annual internal audit

According to the section 4.2 of this Supply Chain Standard Operating Procedure, PSQM staff scheduled and conducted internal audit for supply chain annually at least 2 months before external audit by CB's. The result of internal audit and all correctives action shall documented in annual management review meeting. Facility shall ensure this document are in place.

The last internal audit of supply chain has been conducted on 20 - 28 May 2019. Management review meeting has been conducted on 17 June 2019 when all NC's were closed.

**Status: Comply**

<b>5.4</b>	<b>Purchasing and goods in</b>
<b>5.4.1</b> 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	
Manggala POM – PT. Tunggal Mitra Plantation only received FFB from its own certified estates (Manggala 1, Manggala 2 and Manggala 3 Estate).	
<b>Status: Comply</b>	
<b>5.4.2</b> The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents	
Manggala POM – PT. Tunggal Mitra Plantation only received FFB from its own certified estates (Manggala 1, Manggala 2 and Manggala 3 Estate).	
<b>Status: Comply</b>	
<b>5.5</b>	<b>Outsourcing activities</b>
<b>5.5.1</b> 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.	
Facility does not outsource processing activities like refining or crushing. All CPO product sold through the rent bulking and all PK product sold directly to the buyer.	
The facility uses an independent third party during this process namely CPO transporters from the factory to bulking and renting storage tank services on bulking. Those transporter and bulking engage in a contract and fulfil the RSPO Supply Chain Certification Standard.	
<b>Status: Comply</b>	
<b>5.5.2</b> Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following: <ol style="list-style-type: none"> <li>The site has legal ownership of all input material to be included in outsourced processes;</li> <li>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.</li> <li>The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</li> <li>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</li> </ol>	
Based on document verification known that mill had an agreement with CPO transporter as third parties physical handling of palm product. There is a valid contract that signed on 19 December 2017 (valid until 31 December 2019). In section 4.5.2 stated: <i>“facility has a responsibility to ensure for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance”</i> .	
Those third parties has signed the statement to provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance. During the audit, auditor was verified the compliance of contractor related to the requirement of RSPO Supply Chain. For example, there is valid agreement between mill and transporter and bulking. Each contractor also signed the agreement to open access to respective CB's if necessary related to	

RSPO Supply Chain Standard.	
	<b>Status: Comply</b>
<b>5.5.3</b>	
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.	
The facility uses an independent third party during this process namely CPO transporters from the mill to bulking and renting storage tank services on bulking. All record of names and contact details of all contractors are in place.	
	<b>Status: Comply</b>
<b>5.5.4</b>	
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	
The facility uses an independent third party during this process namely CPO transporters from the mill to bulking (PT. Mitra Angkutan Sejati) and renting storage tank services on bulking (PT. Dumai Paricitra Abadi). All record of names and contact details of all contractors are in place. There is no new transporters since previous assessment.	
	<b>Status: Comply</b>
<b>5.6</b>	<b>Sales and goods out</b>
<b>5.6.1</b>	
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	
According to the selling status in palm trace and mill's record, Manggala POM sold their oil palm product in RSPO Identity Preserved, Book and Claim and conventional. CPO product usually sold in Book and Claim and conventional. PK Product usually sold in RSPO Identity Preserved scheme. All of sale agreement are in place. All palm product dispatch has completed with name and address of buyer, number of contract, product description, quantity, transporter documentation, declaration of product status etc.	
	<b>Status: Comply</b>
<b>5.7</b>	<b>Registration of transactions</b>
<b>5.7.1</b>	
Supply chain actors who:	
<ul style="list-style-type: none"> <li>• are mills, traders, crushers and refineries; and</li> <li>• 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</li> </ul>	
Facility has shown their transaction document that consist registration in IT platform. It also can be downloaded at RSPO palm trace. During the audit, auditor has verified the sales information in RSPO Palm Trace that informed there is certified CSPO/CSPK sold as certified product and conventionally.	
	<b>Status: Comply</b>
<b>5.7.2</b>	
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"> <li>• 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.</li> </ul>	

- 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, facility has documented record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis. All of these transactions are recorded in the RSPO IT Platform. Based on interviews with related staff, information was obtained that data related to sales was the authority of the Global Trading Management in Jakarta Office.

**Shipping Announcement:**

**Finalized Transactions**

Transaction ID	Transaction Date	Buyer Reference Number	Product	Volume	Supply Chain Model	Quality	Transaction Type	Status
TR-120db790-d4bb	08-08-2019		CSPK	348,34	IP		Shipping	Confirmed
TR-0bbd3047-5c87	18-07-2019	9100052877	CSPK	499,89	IP		Shipping	Confirmed
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TR-856e22a3-8011	16-01-2018		CSPK	797,13	IP		Shipping	Confirmed

**Credit Allocation and removing stock:**

**Stock Transactions**

Stock Transaction ID	Date	Product	Supply Chain Model	Transaction Type	Volume
ST-TR-6ccc1de9-8043	20-08-2019	CSPO	IP	Credit Allocation	38,067
ST-TR-7db3ce80-754b	20-08-2019	CSPK	IP	Remove From Certified Stock	6.154,4

\*Volume in MT

**Status: Comply**

**5.8 Training**



<b>5.8.1</b>																	
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																	
Facility has provided annual training of supply chain to the related task who involved in supply chain implementation. The last training conducted on 20 July 2019 in meeting room Manggala POM. Based on interview with security officer, weighbridge operator and supervisor logistic known that all personnel involved has been well-known regarding on supply chain implementation.																	
	<b>Status: Comply</b>																
<b>5.8.2</b>																	
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																	
Based on interview with security officer, weighbridge operator and supervisor logistic known that all personnel involved has been well-known regarding on supply chain implementation.																	
	<b>Status: Comply</b>																
<b>5.9</b>	<b>Record keeping</b>																
<b>5.9.1</b>																	
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																	
Facility has RSPO SCCS Manual- RSPO Supply Chain Certification Standard No. SCCS-Std/RSPO/PSQM/03 dated on 01 March January 2019 Based on document verification, facility has showed their delivery notes, weighbridges ticket and other supply chain document on June 2017. The document is up to date with current RSPO Supply Chain Certification Standard requirement.																	
	<b>Status: Comply</b>																
<b>5.9.2</b>																	
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																	
Facility has RSPO SCCS Manual- RSPO Supply Chain Certification Standard No. SCCS-Std/RSPO/PSQM/03 dated on 01 March January 2019 Based on document verification, facility has showed their delivery notes, weighbridges ticket and other supply chain document on June 2017.																	
	<b>Status: Comply</b>																
<b>5.9.3</b>																	
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.																	
Facility estimated their palm product which is written in annex of initial assessment certificate and monitored in three-monthly bases. If any overproduction, facility will inform the CB to extend their volume.																	
<table border="1"> <thead> <tr> <th>Product</th> <th>Estimation of Certified Product (MT)</th> <th>Actual Production 12 Month before audit (August 2018 – July 2019) (MT)</th> <th>Projected production of the next license period (MT)</th> </tr> </thead> <tbody> <tr> <td>FFB</td> <td>237,791</td> <td>177,900</td> <td>192,200</td> </tr> <tr> <td>CPO</td> <td>54,032</td> <td>40,132</td> <td>43,250</td> </tr> <tr> <td>PK</td> <td>11,014</td> <td>8,062</td> <td>9,610</td> </tr> </tbody> </table>		Product	Estimation of Certified Product (MT)	Actual Production 12 Month before audit (August 2018 – July 2019) (MT)	Projected production of the next license period (MT)	FFB	237,791	177,900	192,200	CPO	54,032	40,132	43,250	PK	11,014	8,062	9,610
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FFB	237,791	177,900	192,200														
CPO	54,032	40,132	43,250														
PK	11,014	8,062	9,610														
<i>Source: production data 12 month before audit (August 2018 – July 2019)</i>																	
	<b>Status: Comply</b>																
<b>5.10</b>	<b>Conversion factors</b>																



<b>5.10.1</b>	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
	Facility only performs FFB processing up to CPO and PK. Based on RSPO SCCS Manual, it is explained that the conversion factors of CPO and PK are based on actual extraction.
	<b>Status: Comply</b>
<b>5.10.2</b>	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.
	Facility only performs FFB processing up to CPO and PK. Based on RSPO SCCS Manual, it is explained that the conversion factors of CPO and PK are based on actual extraction.
	<b>Status: Comply</b>
<b>5.11</b>	<b>Claims</b>
<b>5.11.1</b>	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.
	Based on transaction report documents, all CSPO and CSPK submitted are in accordance with the applied supply chain model that is Identity Preserved.
	<b>Status: Comply</b>
<b>5.12</b>	<b>Complaints</b>
<b>5.12.1</b>	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.
	Procedure for Receiving and Settlement of Complaints is include on RSPO SCCS Manual- RSPO Supply Chain Certification Standard No. SCCS-Std/RSPO/PSQM/02 dated on 02 January 2018. The person responsible for handling complaints is the Manager or the representative, such as an assistant and administration chief. The response to complain about the product must be followed up at least 14 days.
	During this ASA audit, there is no complain on the certified product sold submitted.
	<b>Status: Comply</b>
<b>5.13</b>	<b>Management review</b>
<b>5.13.1</b>	The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken
	According to the section 4.2 of this Supply Chain Standard Operating Procedure, PSQM staff scheduled and conducted internal audit for supply chain annually at least 2 months before external audit by CB's. The result of internal audit and all correctives action shall documented in annual management review meeting. Facility shall ensure this document are in place.
	The last internal audit of supply chain has been conducted on 20 - 28 May 2019. Management review meeting has been conducted on 17 June 2019 when all NC's were closed.
	<b>Status: Comply</b>

**5.13.2**

The input to management review shall include information on:

- Results of internal audits covering RSPO Supply Chain Certification Standard.
- Customer feedback.
- Status of preventive and corrective actions.
- Follow-up actions from management reviews.
- Changes that could affect the management system.
- Recommendations for improvement.

According to the section 4.2 of this Supply Chain Standard Operating Procedure, GSQM staff scheduled and conducted internal audit for supply chain annually at least 2 months before external audit by CB's. The result of internal audit and all correctives action shall documented in annual management review meeting. Facility shall ensure this document are in place.

The last internal audit of supply chain has been conducted on 20 - 28 May 2019. Management review meeting has been conducted on 17 June 2019 when all NC's were closed. The internal review also consist of:

- 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.

There is no specific issues on supply chain arises.

**Status: Comply**

**5.13.3**

The output from the management review shall include any decisions and actions related to:

- Improvement of the effectiveness of the management system and its processes.
- Resource needs.

It documented in management review document as written in preventive action. The procedures and implementation of supply chain were complied with RSPO Supply Chain Standard requirement.

**Status: Comply**

3.2.2. (Module D) CPO Mills Identity Preserved Requirements

Clause	Requirement																														
D1	Definition																														
<p><b>D.1.1</b>  <b>A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from plantation/ estates that are certified against the RSPO Principles and Criteria (RSPO P&amp;C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Module E is applicable.</b></p> <p>General Chain of Custody applied in mill/supply bases and bulking. Supply bases as follows:</p> <ul style="list-style-type: none"> <li>• Manggala 1 Estate</li> <li>• Manggala 2 Estate</li> <li>• Manggala 3 Estate</li> </ul> <p>Mill are only received and processed the FFB until dispatch. Other physically handling such as CPO/PK delivery taken over by the buyer.</p>																															
<p><b>Status: Comply</b></p>																															
D.2	Explanation																														
<p><b>D.2.1</b>  <b>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the certification body (CB) in the public summary of the P&amp;C certification report. For an independent mill, the estimated tonnage of CPO and PK products must be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report</b></p> <p>Current certificate:</p> <table border="1"> <thead> <tr> <th rowspan="2">Name of Mill</th> <th rowspan="2">Capacity (tonnes/hour)</th> <th rowspan="2">Supply Chain Model</th> <th colspan="3">Annual Volume (Tonnes)</th> </tr> <tr> <th>FFB</th> <th>CPO</th> <th>PK</th> </tr> </thead> <tbody> <tr> <td>Manggala POM</td> <td>60</td> <td>Identity Preserved</td> <td>237,791</td> <td>54,032</td> <td>11,014</td> </tr> </tbody> </table> <p>Facility has propose the estimate volume of CPO and PK for the next certification period as follows:</p> <table border="1"> <thead> <tr> <th rowspan="2">Name of Mill</th> <th rowspan="2">Capacity (tonnes/hour)</th> <th rowspan="2">Supply Chain Model</th> <th colspan="3">Annual Volume (Tonnes)</th> </tr> <tr> <th>FFB</th> <th>CPO</th> <th>PK</th> </tr> </thead> <tbody> <tr> <td>Manggala POM</td> <td>60</td> <td>Identity Preserved</td> <td>192,200</td> <td>43,250</td> <td>9,610</td> </tr> </tbody> </table>		Name of Mill	Capacity (tonnes/hour)	Supply Chain Model	Annual Volume (Tonnes)			FFB	CPO	PK	Manggala POM	60	Identity Preserved	237,791	54,032	11,014	Name of Mill	Capacity (tonnes/hour)	Supply Chain Model	Annual Volume (Tonnes)			FFB	CPO	PK	Manggala POM	60	Identity Preserved	192,200	43,250	9,610
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Manggala POM	60	Identity Preserved	192,200	43,250	9,610																										
<p><b>Status: Comply</b></p>																															
<p><b>D.2.2</b>  <b>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).</b></p> <p>Manggala POM – Sime Darby Plantation, subsidiary of Sime Darby Plantation Bhd has registered in RSPO membership 1-0008-04-000-00 since 7 September 2004.</p> <p>Manggala POM has been registered in IT platform palm trace RSPO <a href="https://palmtrace.rspo.org/web/rspo/member-directory">https://palmtrace.rspo.org/web/rspo/member-directory</a> which information as follows:</p>																															

- Member Name: Sime Darby Plantation - Manggala POM, PT. TMP
- Account UID: RSPO\_AC1000000339
- Core Product: Palm Oil
- Member ID: RSPO\_PO1000000330
- Type of Business: Oil Mill

For example: there is some record of shipping announcement on palm trace

**Finalized Transactions**

Transaction ID	Transaction Date	Buyer Reference Number	Product	Volume	Supply Chain Model	Quality	Transaction Type	Status
TR-120db790-d4bb	08-08-2019		CSPK	348,34	IP		Shipping	Confirmed
TR-0bbd3047-5c87	18-07-2019	9100052877	CSPK	499,89	IP		Shipping	Confirmed
TR-679acb2f-d97d	08-07-2019	9100051497	CSPK	400,08	IP		Shipping	Confirmed
TR-823fe16c-5db0	28-01-2019		CSPK	299,23	IP		Shipping	Confirmed
TR-1136f1a3-37cd	28-01-2019		CSPK	498,82	IP		Shipping	Confirmed
TR-202593b5-ee36	18-09-2018		CSPK	546,65	Segregation		Shipping	Confirmed
TR-cf7a2e56-9622	18-09-2018		CSPK	596,91	Segregation		Shipping	Confirmed
TR-831f923-d5b1	18-09-2018		CSPK	842,75	Segregation		Shipping	Confirmed
TR-71c875a8-1702	25-04-2018		CSPK	794,67	IP		Shipping	Confirmed
TR-4fac4029-a03e	21-03-2018		CSPK	747,97	IP		Shipping	Confirmed
TR-7939cabd-29fd	22-02-2018		CSPK	829,21	IP		Shipping	Confirmed
TR-3429f2e6-5cb4	25-01-2018		CSPK	798,83	IP		Shipping	Confirmed
TR-e1ce3dfb-938f	25-01-2018		CSPK	199,28	IP		Shipping	Confirmed
TR-856e22a3-8011	16-01-2018		CSPK	797,13	IP		Shipping	Confirmed

**Stock Transactions**

Stock Transaction ID	Date	Product	Supply Chain Model	Transaction Type	Volume
ST-TR-6cc01de9-8043	20-08-2019	CSPK	IP	Credit Allocation	38.067
ST-TR-7db3ce80-754b	20-08-2019	CSPK	IP	Remove From Certified Stock	6.154,4

\*Volume in MT

**Status: Comply**

**D.3 Documented procedures**

**D.3.1**

The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall

- Complete and up to date procedures covering the implementation of all the elements in these requirements;
- The role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site's procedures for the implementation of this standard.

Facility has RSPO SCCS Manual- RSPO Supply Chain Certification Standard No. SCCS-Std/RSPO/PSQM/03 dated on 01 March January 2019. The scope of RSPO Supply Chain System: FFB Certificate processing from raw material acceptance to storage and delivery process produces Certified Sustainable Palm Oil (CSPO) and CSPK with module D (IP) both physical and office administration. The summary of this procedure were explain on below points:

- 4.2.1. The procedure is documented
- 4.2.2. Internal audits are conducted at least annually to ensure: the organization complies with RSPO SCCS requirements and RSPO Market Communication & Claim documents. Where the internal audit is done at least 2 months before the external audit. The internal audit results are included in the management review conducted at least once a year.
- 4.3. The Mill ensures the purchase of incoming goods, however the marketing division in Jakarta's is responsible for checking the validity of supplier certificates, licenses for traders and distributors.
  - 4.3.2. The Unique code/ unique identification number aims to ensure that products are sold through quality tests and can be traced back to the beginning of the process.
- 4.5. Third party activities (outsourcing)
- 4.6. Sales and goods out  
Units that need to make announcements and trade confirmations in the RSPO IT Platform, this should also include making shipping announcements (each shipment/shipping group by the marketing division). Certified products sold through other schemes or conventional means or in case of lack of production, lost or damaged shall be removed.
- 4.8. Training→ The training plan for RSPO SCCS requirements process should be reviewed continuously/annually.
- 4.9. The record keeping  
The record keeping of all documents are minimum 10 years for financial report documents and transactions; and minimum 2 years for data other than financial documents.
- 4.10 Conversion Factor  
Conversion value is determined by marketing division in Jakarta, based on data sent by Mill on the basis of the resulting of FFB processing, so that the conversion value obtained is the same as the actual obtained by the Mill, and the conversion reference by marketing follows the mill manager monthly report period.
- 4.11. Claim pursuant to RSPO communication and claim.
- 4.12. Complaint  
Stakeholders may complain by email or face directly to the management representative. The complaint should be handled no later than one month after the complaint is received. Especially for complaints related to salary rights, incentive benefits, product complaints, and payments is should be acted upon no later than 14 days after the complaint has been received. All complaints and responses should be recorded.
- 4.13. Management review  
Management review plan is established: after internal audit, before external audit checks and minimally done once in twelve months /one year.  
Input for management review should include information: internal audit results of SCCS requirements, production achievements, customer feedback, preventive and corrective action status, follow up on review management, changes that may affect system management and improvement recommendations.

**Status: Comply**

**D.3.2**

**The site shall have documented procedures for receiving and processing certified FFBs**

Facility has demonstrated the documentation of record keeping and processing of certified FFBs.

Month	FFB (MT)		
	RSPO Certified	Non-Certified	Total
August 18 - July 19	177,900	-	177,900

Notes: mill consistently processed certified FFB.

	<b>Status: Comply</b>																											
<b>D.4</b>	<b>Purchasing and goods in</b>																											
<b>D.4.1</b>																												
<b>The site shall verify and document the tonnage and sources of certified FFBs received.</b>																												
In accordance with supply chain procedure as explained in clause D.3.1 above, facility has demonstrated the documentation of record keeping and processing of certified FFBs. Mill only received FFB from his own certified-estates (Mangala 1, Mangala 2 and Mangala 3 Estate).																												
<b>Certified and non-certified FFB received period of June 2018 to May 2019 (twelve month)</b>																												
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<b>D.4.2</b>																												
<b>The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.</b>																												
Facility estimated their palm product which is written in annex of initial assessment certificate and monitored in three-monthly bases. If any overproduction, facility will inform the CB to extend their volume.																												
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<i>Source: production data 12 month before audit (August 2018 – July 2019)</i>																												
	<b>Status: Comply</b>																											
<b>D.5</b>	<b>Record keeping</b>																											
<b>D.5.1</b>																												
<b>The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</b>																												
Based on document verification informed that facility only received FFB from certified area and sold as RSPO certified.																												
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Period	CPO Production (MT)		Total	Cert CPO Dispatch (MT)			Total																					
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August 18 - July 19	40,132	-	40,132	-	-	38,067	38,067																					
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August 18 - July 19	8,082	-	8,082	2,046	-	6,031	8,077																					
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<b>D.6</b>	<b>Processing</b>																											
<b>D.6.1</b>																												
<b>The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm</b>																												



**product is kept separated from non-certified oil palm product including during transport and storage to strive for 100% separation.**

Manggala POM – PT. Tunggal Mitra Plantation only received and processed FFB from its own certified estates (Manggala 1, Manggala 2 and Manggala 3 Estate). Manggala POM only act as producer of RSPO certified oil palm products. Until this audit, there is no record of FFB received from other sources above. Based on interview with management representatives during the audit, there is no option for mill to accept non certified FFB until now.

**Status: Comply**

**3.3. Conformity Checklist of Certificate and Trademark Use**

1.	<b>Evidence of permission or approval certificate and trademark from Certification Body which submitted by Client</b>	<b>X or√</b>
<b>ASA-1.4</b>	PT Tunggal Mitra Plantation (Sime Darby Plantation Bhd) do not use RSPO trademark and CB Logo.  Trademark License Number of Sime Darby Plantation Bhd is "RSPO-1106024"	√
<b>Status: Comply</b>		
2.	<b>Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of Logo Use</b>	<b>X or√</b>
<b>ASA-1.4</b>	PT Tunggal Mitra Plantation (Sime Darby Plantation Bhd) do not use RSPO trademark and CB Logo.  Trademark License Number of Sime Darby Plantation Bhd is "RSPO-1106024"	√
<b>Status: Comply</b>		
3.	<b>Implementation of Certificate and Trademark is not used on product</b>	<b>X or√</b>
<b>ASA-1.4</b>	PT Tunggal Mitra Plantation (Sime Darby Plantation Bhd) do not use RSPO trademark and CB Logo.  Trademark License Number of Sime Darby Plantation Bhd is "RSPO-1106024"	√
<b>Status: Comply</b>		
4.	<b>Controlling of Certificate and Trademark, including withdrawing inappropriate logo.</b>	<b>X or√</b>
<b>ASA-1.4</b>	PT Tunggal Mitra Plantation (Sime Darby Plantation Bhd) do not use RSPO trademark and CB Logo.  Trademark License Number of Sime Darby Plantation Bhd is "RSPO-1106024"	√
<b>Status: Comply</b>		

**3.4. Summary of RSPO Partial Certification.**

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

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

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

MUTU Auditor has verified company partial certification and concludes that:

- There are significant land conflicts in PT Mitra Austral Sejahtera, there is still an issue that remains unresolved social i.e. from Serikat Petani Kelapa Sawit (SPKS), but improvements are ongoing. Based on confirmation letter from Sime Darby Plantation on 27 June 2019 inform that PT Mitra Austral Sejahtera is dispose from Indonesian Subsidiary of Sime Darby Plantation.
- PT Budidaya Agro Lestari waiting for land title process.
- The company has follow RSPO requirement related to New Planting Procedure and Remediation and Compensation Procedure.
- There is no labour disputes that are not being resolved through an agreed process
- All plantations established since 2005 have been done so in accordance with the applicable laws of the country and that there is no evidence of non-compliance with law in any of the non-certified holdings which has not been declared above

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.2.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p><i>Company Group/Holding Statement:</i> Companies are already doing internal audits. There are internal audit reports for each company.</p> <p><i>Auditor Verification:</i> Internal Audit report available for uncertified management unit for example PT Sandika Natapalma – Karya Palma Estate</p> <p>Progress Update for PT MAS. Engagement with RSPO. SDP is submitting a monthly basis report to RSPO on the case. Five monthly update/responses have been submitted to RSPO to-date. The lasts report was submitted on 28 May 2018.</p> <p>On April 2019, the secretariat update the developments of PT MAS Complaint. The complaints panel recent deliberation, please be</p>

		<p>informed that the complaints Panel has directed to proceed with the legal review and Dr Kurnia Warman will be engaged to perform the said legal review. Based on confirmation letter from Sime Darby Plantation on 27 June 2019 inform that PT Mitra Austral Sejahtera is dispose from Indonesian Subsidiary of Sime Darby Plantation.</p>
i.	<p>No replacement after dates defined in NIs Criterion 7.3 of:</p> <ul style="list-style-type: none"> <li>• Primary forest.</li> <li>• Any area identified as containing High Conservation Values (HCVs).</li> <li>• Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3.</li> </ul>	<p><b>Company Group/Holding Statement:</b> HCV assessment has been conducted for uncertified units i.e. Darby Plantation Liberia operations (by RSPO approved assessors – Dr SK Yap in 2011).</p> <p><b>Auditor Verification:</b> Sime Darby Plantation Bhd sent disclosure of liability including LUCA analysis to RSPO Secretariat on 2 December 2014 and 2<sup>nd</sup> revision on 24 June 2016. The companies ensuring reporting of disclosure of liability progress to RSPO and according to the CB's correspondence with RSPO Remediation and Compensation.</p>
i.	<p>Any new plantings since January 1<sup>st</sup> 2010 must comply with the RSPO New Plantings Procedure.</p>	<p><b>Company Group/Holding Statement:</b> A new mill will be set up in Liberia and planned for commissioning in February 2016. Preparation to undergo the RSPO Certification process is in progress and SDP targets to undergo RSPO Certification by end 2017. RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps is in progress. *Note: RSPO NPP Announcements for SDP can be found at <a href="http://www.rspo.org/certification/new-planting-procedures/public-consultations/page/14">http://www.rspo.org/certification/new-planting-procedures/public-consultations/page/14</a></p> <p><b>Auditor Verification:</b></p> <ul style="list-style-type: none"> <li>• Karya Palma Estate (PT Sandika Natapalma) and Baturus Estate (PT Budidaya Agro Lestari) any new planting after January 1<sup>st</sup> 2010 and due to not conduct NPP.</li> <li>• RSPO NPP process has been completed in 2011 for a new mill in Liberia.</li> </ul>
ii.	<p>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>	<p><b>Company Group/Holding Statement:</b> Sime Darby (Liberia) Plantation Inc. Status: Box G - Close for Monitoring Further details please refer to: <a href="http://www.rspo.org/members/complaints/status-">http://www.rspo.org/members/complaints/status-</a></p>

		<p><a href="#">of-complaints/view/46</a> PT Mitra Austral Sejahtera (Sime Darby Bhd) Further details please refer to: <a href="http://www.rspo.org/members/complaints/status-of-complaints/view/29">http://www.rspo.org/members/complaints/status-of-complaints/view/29</a></p> <p><i>Auditor Verification:</i> Auditor has verified the supporting evidence of above the company statement. There are land conflict in PT Bina Sains Cemerlang, this issue was raise on 22 April 2017 and still being process to resolve.</p>
iii.	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	<p><i>Company Group/Holding Statement:</i> No stakeholder comments or complaints received.</p> <p><i>Auditor Verification:</i> Auditor has verified the supporting evidence of above the company statement. There are no labour dispute in company unit.</p>
iv.	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	<p><i>Company Group/Holding Statement:</i> None noted. No stakeholder comments or complaints received.</p> <p><i>Auditor Verification:</i> Auditor has verified the supporting evidence of above the company statement. There is any legal non-compliance for company under SDP waiting for land title process, ie:</p> <ul style="list-style-type: none"> <li>• PT Sime Indo Agro 1,652 Ha</li> <li>• PT Aneka Inti Persada 421.31 Ha</li> <li>• PT Bina Sains Cemerlang 308.25 Ha</li> <li>• PT Bersama Sejahtera Sakti 765 Ha</li> <li>• PT Langgeng Muaramakmur 1,162 Ha</li> <li>• PT Paripurna Swakarsa 1,120 Ha</li> <li>• PT Swadaya Andika 63 Ha</li> <li>• PT Bahari Gembira Ria 1,639 Ha</li> <li>• PT Guthrie Pecconina Indonesia 4,133 Ha</li> <li>• PT Perkasa Subur Sakti 1,286 Ha</li> </ul>

3.5 Identification of Findings, Corrective Action, Observations, Opportunity for Improvement and Noteworthy Positive Components

3.5.1. Identification of Findings, Corrective Actions and Observations at ASA 1.3

<i>NCR No.</i>	: 2018.01	<i>Issued by</i>	: Dwi Haryati
<i>Date Issued</i>	: 20 September 2018	<i>Time Limit</i>	: 19 December 2018
<i>NC Grade</i>	: Major	<i>Date of Closing</i>	: 23 October 2018
<i>Standard Ref. &amp; Requirement</i>	: 6.9.2 A policy to protect the reproductive rights, shall be documented, implemented and communicated to all levels of the workforce		
<b>Evidence observed &amp; Non-Conformance Description</b> (filled by auditor): The company has an H1 leave policy as a form of protecting reproductive rights for women. However, based on interviews with gender committees and women workers, information was obtained that the policy of giving H1 leave had not been applied to all female workers.			
<b>Root Cause Analysis</b> (filled by organization audited): All female workers (especially female workers who are not in the field) do not understand the provision of menstrual leave according to Act No. 13 of 2013.			
<b>Correction</b> (filled by organization audited): - The management of the unit issued a menstrual leave permit memorandum for female workers. - socialization regarding the menstrual leave permit memorandum to female workers.			
<b>Corrective Action</b> (filled by organization audited): - Management of the unit will ensure and monitor the implementation of menstrual leave			
<b>Assessor Evaluation and Conclusion</b> (filled by auditor): <b>23 October 2018</b> The company has shown some evidence of improvement including: <ul style="list-style-type: none"> <li>• Memorandum dated September 20, 2018 related to the Affirmation of Giving Menstrual Leave Permit for female workers explained that workers who felt pain during menstruation were given rest periods by first examination by the Medical team</li> <li>• Socialization of memorandum to all female workers for MGE-1 &amp; MGE-3 conducted on October 10, 2018 and MGE-2 conducted on October 11, 2018.</li> </ul> Based on the explanation above, this nonconformity is stated to be fulfilled and the implementation will be observed in the next assessment.			
<i>Verified by</i>	: Dwi Haryati		

<i>NCR No.</i>	: 2018.02	<i>Issued by</i>	: Muhammad Rinaldi
<i>Date Issued</i>	: 20 September 2018	<i>Time Limit</i>	: 19 December 2018
<i>NC Grad</i>	: Major	<i>Date of Closing</i>	: 28 November 2018



<b>Standard Ref. &amp; Requirement</b>	<p><b>: General COC 5.7.2</b></p> <p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.</li> <li>• Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.</li> </ul>								
<p><b>Evidence observed (filled by auditor):</b></p> <p>Based on Balance Sheet and registration data on Palmtrace License Period (January-September 2018) known:</p> <ul style="list-style-type: none"> <li>• There is a difference in PK sales data, on palmtrace data there are 3,369.76 tons of sales, while there are 5,470.42 tons of Balance Sheet data sold with RSPO claims.</li> <li>• There are differences in CPO sales data. In the Balance Sheet data there are 18,310.16 tons of CPO sold with RSPO claims and 9,400.19 tons sold conventionally while in Data Palm Trace there are only Book &amp; Claim registrations of 5,185 tons</li> </ul>									
<p><b>Non-Conformance Description (filled by auditor):</b></p> <p><i>This shows that not all sales of certified products have been registered with Palmtrace.</i></p>									
<p><b>Root Cause Analysis (filled by organization audited):</b></p> <p>There was no coordination between marketing in Jakarta and unit management regarding the sale of palm products so that Jakarta marketing did not register the selling data on palmtrace.</p>									
<p><b>Correction (filled by organization audited):</b></p> <ul style="list-style-type: none"> <li>• Coordinate with marketing in Jakarta regarding CPO / PK sales data so that can be adjusted between physical selling and palmtrace data</li> <li>• Creating balance sheet data that is in accordance with the data on palmtrace.</li> </ul>									
<p><b>Corrective Action (filled by organization audited):</b></p> <p>The management unit will ensure and coordinate with Marketing in Jakarta for product sales data, so that the data on Palmtrace is in accordance with existing data on unit management.</p>									
<p><b>Assessor Evaluation and Conclusion (filled by auditor):</b></p> <p><b>28 November 2018</b></p> <p>The company shows the Balance Sheet 2018 (period January-August 2018) explaining the monthly recapitulation of CPO &amp; PK production &amp; sales data and document of CPO &amp; PK Sales Information period January to August 2018 which explain sales data for each Delivery Order with separation of certified and non-certified sales claims, with the following details:</p>									
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2" style="width: 15%;">Month</th> <th colspan="2" style="text-align: center;">CPO</th> </tr> <tr> <th style="width: 40%;">Production (Kg)</th> <th style="width: 45%;">Sold (Kg)</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>		Month	CPO		Production (Kg)	Sold (Kg)			
Month	CPO								
	Production (Kg)	Sold (Kg)							

	Certified	Non-Certified	Certified	Conventional
January 2018	3,618,276			3,850,200
February 2018	2,814,941			2,777,650
March 2018	3,401,095			3,262,090
April 2018	3,137,106			2,899,510
May 2018	3,356,751			3,267,860
June 2018	2,634,013			2,949,860
July 2018	3,691,377			3711190
August 2018	3,645,081			3,679,360
<b>Total</b>	<b>26,298,640</b>			<b>26,397,720</b>

Month	PK			
	Production		Sold	
	Certified	Non-Certified	Certified	Conventional
January 2018	851,566		771,380	114,350
February 2018	640,157		536,930	-
March 2018	771,533		657,750	-
April 2018	696,013		749,030	-
May 2018	738,987		772,860	-
June 2018	579,319		480,360	-
July 2018	789,237		731,960	-
August 2018	771,910		655,800	-
<b>Total</b>	<b>5,838,722</b>		<b>5,356,070</b>	<b>114,350</b>

Based on that document, it is known that the recapitulation of Balance Sheet sales data is in accordance with the sales data in the Sales Information document.

In addition, there is registration on palmtrace with the following details:

- For CPO there are credit allocation of 5,185 tons on February 9, 2018, remove stock as much as 17,605.48 tons on October 16, 2018 and remove stock as much as 8,792.41 tons on November 22, 2018 with a total of 31,582.89 tons.
- For PK, there are certified claims of 5,356.07 tons and remove stock of 2,100.66 tons on October 16, 2018 with a total of 7,456.73 tons

Based on the explanation above, this nonconformity is stated to be fulfilled

**Verified by** : **Muhammad Rinaldi**

<b>NCR No.</b>	<b>: 2018.03</b>	<b>Issued by</b>	<b>: Muhammad Rinaldi</b>
<b>Date Issued</b>	<b>: 20 September 2018</b>	<b>Time Limit</b>	<b>: 19 December 2018</b>
<b>NC Grade</b>	<b>: Major</b>	<b>Date of Closing</b>	<b>: 23 October 2018</b>
<b>Standard Ref. &amp; Requirement</b>	<b>General COC</b> <b>5.13.2</b> The input to management review shall include information on: <ul style="list-style-type: none"> <li>• Results of internal audits covering RSPO Supply Chain Certification Standard.</li> <li>• Customer feedback.</li> <li>• Status of preventive and corrective actions.</li> <li>• Follow-up actions from management reviews.</li> <li>• Changes that could affect the management system.</li> </ul>		

	<ul style="list-style-type: none"> <li>• Recommendations for improvement.</li> </ul>
<p><b>Evidence observed (filled by auditor):</b> In Balance Sheet, it is known that there is a return of PK products as much as 12.87 tons in July 2018, but on the results of the Management Review conducted in September 2018, it is explained that in 2018 there were no complaints from buyers.</p>	
<p><b>Non-Conformance Description (filled by auditor):</b> The company has not conducted discussions regarding product returns in July 2018 as one of the information in the Customer Feedback section on Management Review activities.</p>	
<p><b>Root Cause Analysis (filled by organization audited):</b> Unit management does not understand that claims and complaints must be included in management reviews</p>	
<p><b>Correction (filled by organization audited):</b> Re-conduct management review and discuss related claims and complaints.</p>	
<p><b>Corrective Action (filled by organization audited):</b></p> <ul style="list-style-type: none"> <li>• Ensure that management reviews are carried out every year and are ensured to discuss related claims and complaints.</li> <li>• Ensure that all parameters for product quality can be below the target, so there are no claims and complaints.</li> </ul>	
<p><b>Assessor Evaluation and Conclusion (filled by auditor):</b> <b>23 October 2018</b> The Company shows Management Review Minutes conducted on September 24, 2018 which have been discussed the complaints from buyers. In addition, there was a socialization of the results of the management review to employees on September 26, 2018. The company also showed the Customer Complaints Registration List that explained their complaints and action plans.  Based on the explanation above, this nonconformity is stated to be fulfilled</p>	
<b>Verified by</b>	<b>: Muhammad Rinaldi</b>

<b>NCR No.</b>	<b>: 2018.04</b>	<b>Issued by</b>	<b>: Muhammad Rinaldi</b>
<b>Date Issued</b>	<b>: 20 September 2018</b>	<b>Time Limit</b>	<b>: 19 December 2018</b>
<b>NC Grade</b>	<b>: Major</b>	<b>Date of Closing</b>	<b>: 27 November 2018</b>
<b>Standard Ref. &amp; Requirement</b>	<b>: D.5.1</b> <b>The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</b>		
<p><b>Evidence observed (filled by auditor):</b> In Balance Sheet, it is known that there are sales of products with RSPO certified claims and conventional sales, but the company can not shown the basis for product sales data recapitulation with RSPO certified claims and conventional sales.</p>			
<p><b>Non-Conformance Description (filled by auditor):</b> company can not shown the basis for product sales data recapitulation with RSPO certified claims and conventional sales.</p>			

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

The unit management has not obtained the final data from the marketing regarding the sale of certified and non-certified CPO and Kernel.

**Correction** *(filled by organization audited):*

- Request to department marketing for product sales data and balance sheet data to be adjusted back to products claimed by RSPO or conventional.
- Making balance sheet data on product sales data Jan-Ags 2018.

**Corrective Action** *(filled by organization audited):*

The management unit will ensure and coordinate with Marketing Jakarta for product sales data can be sent to the unit every month, so that data can be monitored every month.

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

**27 November 2018**

The company shows the Balance Sheet 2018 (period January-August 2018) explaining the monthly recapitulation of CPO & PK production & sales data and document of CPO & PK Sales Information period January to August 2018 which explain sales data for each Delivery Order with separation of certified and non-certified sales claims, with the following details:

Month	CPO			
	Production (Kg)		Sold (Kg)	
	Certified	Non-Certified	Certified	Conventional
January 2018	3,618,276			3,850,200
February 2018	2,814,941			2,777,650
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<b>Total</b>	<b>26,298,640</b>			<b>26,397,720</b>

Month	PK			
	Production		Sold	
	Certified	Non-Certified	Certified	Conventional
January 2018	851,566		771,380	114,350
February 2018	640,157		536,930	-
March 2018	771,533		657,750	-
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June 2018	579,319		480,360	-
July 2018	789,237		731,960	-
August 2018	771,910		655,800	-
<b>Total</b>	<b>5,838,722</b>		<b>5,356,070</b>	<b>114,350</b>

Based on that document, it is known that the recapitulation of Balance Sheet sales data is in accordance with the sales data in the Sales Information document. Based on the explanation above, this nonconformity is stated to be fulfilled.

**Verified by** : **Muhammad Rinaldi**

3.5.2. Identification of Findings, Corrective Actions and Observations at ASA 1.4

<i>NCR No.</i>	: 2019.01.	<i>Issued by</i>	: Mohamad Amarullah
<i>Date Issued</i>	: 23 August 2019	<i>Time Limit</i>	: 21 November 2019
<i>NC Grade</i>	: Major	<i>Date of Closing</i>	: 06 September 2019
<i>Standard Ref. &amp; Requirement</i>	: 2.1.1 Evidence of compliance with relevant legal requirements shall be available		
<p><b>Evidence observed (filled by auditor):</b></p> <ul style="list-style-type: none"> <li>At the time of audit Surveillance 1.4, it was known that Manggala Factory (MGF) has 6 Boiler Operators with 3 of them were Licensed Boiler Operator Class 1. The Boiler has capacity 45 ton/hour and operated in 2 shift. Thus, number of licensed Operator with OSH competency is not comply with Minister of Manpower Regulation (Permenaker) No. 01 in 1998.</li> <li>MGF has Generator Set or Production Engine with Capacity &gt;200 kVA. However, there is no licensed Electricity Safety (OSH) Expert or "AK3 Listrik" in the respected unit, as required by Permenaker No. 12 in 2015.</li> </ul>			
<p><b>Non-Conformance Description (filled by auditor):</b> The company has no mechanism to evaluate OSH competency for all workers or operators, which required by applicable regulations in Indonesia.</p>			
<p><b>Root Cause Analysis (filled by organization audited):</b></p> <ul style="list-style-type: none"> <li>The company has not implementing on operator OSH competency monitoring and evaluation as required by Indonesian regulations.</li> <li>Lack of understanding towards Minister of Manpower Regulation (Permenaker) No. 01 in 1998 and No. 12 in 2015 about number of Boiler Operator and OSH Expert, respectively.</li> </ul>			
<p><b>Correction (filled by organization audited):</b></p> <ul style="list-style-type: none"> <li>Unit management to make list of all Operators that informed regulation reference and evaluation</li> <li>MGF unit to send 3 Boiler Operators to join Operator Class 1 training that carried out by PT Dhawal Prima Abadi (Reg. No. SKP.114/BINWAS K3-PNK3/II/2019 in Medan, Sumatera Utara.</li> <li>MGF unit to send 1 worker to join Electricity OSH license training that carried out PT.Arpindo Pratama in Pekanbaru, Riau.</li> </ul>			
<p><b>Corrective Action (filled by organization audited):</b></p> <ul style="list-style-type: none"> <li>To conduct monitoring on operator competency, especially that required by applicable regulations in Indonesia.</li> <li>To carry out socialization to all units when update regulation has identified by Department of Sustainability and PSD.</li> </ul>			
<p><b>Assessor Evaluation and Conclusion (filled by auditor):</b> <b>Verification 06 September 2019</b> Root of cause analysis and corrective action explained by the company are acceptable. Furthermore, correction evidence is described as follows:</p> <ul style="list-style-type: none"> <li>The company shows list of operator monitoring which informed name of operators, license required, license validity and information of training that will be conducted in the future.</li> <li>The company shows three MGF Boiler Class 1 Operator Certificates, e.g. No. K3PUBT.B.I.00136.VIII.2019; No. K3PUBT.B.I.00137.VIII.2019 and No. K3PUBT.B.I.00138.VIII.2019 dated 31 August 2019. The training is conducted on 26-31 August 2019 by PT Dhawal Prima Abadi in Medan.</li> </ul>			

- Letter of PT Arpindo Pratama Director No. 646/SK.AP/VIII/2019 dated 28 August 2019 which informed that 1 worker of PT TMP has registered for Electricity OSH Expert (AK3 Listrik) training that will be carried out by PT Arpindo in Pekanbaru.

Based on explanation above, NCR No. 2019.01 is considered **closed**.

**Verified by** : **Mohamad Amarullah**

<b>NCR No.</b>	: <b>2019.02.</b>	<b>Issued by</b>	: <b>Mohamad Amarullah</b>
<b>Date Issued</b>	: <b>23 August 2019</b>	<b>Time Limit</b>	: <b>Recertification</b>
<b>NC Grade</b>	: <b>Minor</b>	<b>Date of Closing</b>	: <b>-</b>
<b>Standard Ref. &amp; Requirement</b>	: <b>5.3.3</b> <b>A documented waste management plan to avoid or reduce pollution and its implementation shall be available</b>		
<b>Evidence observed (filled by auditor):</b> Based on observation in Gas (Diesel) Station of MGE-3, it was found spill of Diesel on the floor areas and extent to the soil ground, eventhough there is two Containment for spill trapping purposes.			
<b>Non-Conformance Description (filled by auditor):</b> Unit magement is not be able to ensure that diesel bunkering activities is not contaminate the environment.			
<b>Root Cause Analysis (filled by organization audited):</b>			
<b>Correction (filled by organization audited):</b>			
<b>Corrective Action (filled by organization audited):</b>			
<b>Assessor Evaluation and Conclusion (filled by auditor):</b>			
<b>Verified by</b>	:		

<b>NCR No.</b>	: <b>2019.03.</b>	<b>Issued by</b>	: <b>Andi Pratama Pasaribu</b>
<b>Date Issued</b>	: <b>23 August 2019</b>	<b>Time Limit</b>	: <b>21 November 2019</b>
<b>NC Grade</b>	: <b>Major</b>	<b>Date of Closing</b>	: <b>16 November 2019</b>
<b>Standard Ref. &amp; Requirement</b>	: <b>6.5.1</b> <b>Documentation of pay and conditions for employees based on the existing manpower regulations shall be available.</b>		
<b>Evidence Observed (filled by auditor):</b> Based on the results of field observations at Manggala 2 Estate found 3 people who were doing quotes lose fruit picker. From the interview results it is known that these 3 people are the wives of harvesters who work in the company but are not registered as employees and / or have a company working relationship.			



**Non-Conformance Description (filled by auditor):**

The company has not been able to show that policies related to the prohibition of hiring employees without work ties have been implemented and monitored properly.

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

- There is no specific understanding for workers who come from the Nias area who do not understand Indonesian, so the socialization of the "prohibition on hiring people without work ties" socialization carried out on May 8, 2019 is not yet sufficiently understood.
- Lack of monitoring in the field regarding compliance does not employ people without work ties

**Correction (filled by organization audited):**

- Re-socialization of the prohibition on hiring people without work ties has been carried out again on 02 September 2019
- A harvest employee statement has been made that will not bring a wife, sister or friend to work in the field without having a working association with PT Tunggal Mitra Plantation
- Signboards have been made that use 2 languages namely Indonesian and Nias regional languages regarding the obligation to use PPE according to their respective occupations, prohibitions on bringing children under the age of 18 to help work in the field and the prohibition of working to bring a wife, younger sibling or relatives without work ties with companies
- Estate Manager's memorandum of compliance has been monitored regarding the prohibition of employing people without work ties

**Corrective Action (filled by organization audited):**

- Regular updates of signboard conditions using 2 languages (Indonesian & Nias)
- Periodic outreach on the prohibition of working to bring a wife, younger sibling or sibling without a working relationship with the company
- Periodic monitoring of the compliance of Estate Manager's memorandum regarding the prohibition of employing people without work ties
- Imposing strict sanctions if workers disobey the Estate Manager's memorandum.

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

**Verification September 30, 2019**

The company has determined the root cause, corrective and corrective actions to resolve the Non-Conformity identified at the time of the assessment, in addition the company also provided evidence of the following improvements:

- Statement of not bringing a wife and children who do not have work ties to work in Manggala 2 Estate Division 1.
- Socialization of the prohibition on bringing a wife and children without work ties on September 2, 2019 for Manggala 2 Estate Division 1.
- Monitoring of workers without official ties at Manggala 2 Estate

Based on the corrective evidence provided above, there is still some information and other evidence needed by the auditor team for the corrective action given. Related to this, **the Non-Conformity No. 2019.03 declared Not Yet Fulfilled.**

**Verification is November 16, 2019**

The company has shown additional evidence and information for the Non-Conformity mentioned above, including:

- Socialization of the prohibition on bringing a wife and children without work ties on September 2, 2019 for Manggala 1 Estate.
- Socialization of the prohibition on bringing a wife and children without work ties on September 2, 2019 for Manggala 3 Estate.
- A statement does not bring a wife, children or workers who do not have a working relationship with the company

<p>for each worker in Manggala 1 Estate</p> <ul style="list-style-type: none"> <li>• A statement does not bring a wife, children or workers who do not have a working relationship with the company for each worker in Manggala 3 Estate</li> <li>• Results of monitoring of workers without work ties when workers are working and muster morning at Manggala 1 Estate</li> <li>• Results of monitoring of workers without work ties when workers are working and muster morning at Manggala 3 Estate</li> <li>• Placement of Warnings The prohibition of carrying workers without work ties in the company's operational area is made in Nias language in each unit.</li> </ul> <p>Based on the evidence of the improvement given above, <b>the Non-Conformity No. 2019. 03 is stated as fulfilled and will be observed again at the next evaluation.</b></p>
<p><b>Verified by</b> : <b>Andi Pratama Pasaribu</b></p>

<b>NCR No.</b>	: <b>2019.04.</b>	<b>Issued by</b>	: <b>Andi Pratama Pasaribu</b>
<b>Date Issued</b>	: <b>23 August 2019</b>	<b>Time Limit</b>	: <b>Recertification</b>
<b>NC Grade</b>	: <b>Major</b>	<b>Date of Closing</b>	: <b>-</b>
<b>Standard Ref. &amp; Requirement</b>	<p>: <b>7.3.1</b>  <b>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).</b></p>		
<p><b>Evidence observed (filled by auditor):</b>  Sime Darby Plantation has sent Land Use Change Analysis (LUCA) is sent to the RSPO Secretariat on 28 August 2016 with the attachment of the letter included the calculation LUCA PT Tunggal Mitra Plantation (CH) and has received responses from RSPO Secretariat on 9 January 2019.</p>			
<p><b>Non-Conformance Description (filled by auditor):</b>  Based on document review PSQM Department attending BHCV WG Meeting and the WG has agreed this NCR will be closed by RSPO Secretariat, that means growers are given graces period for a year to close the issue RSPO Secretariat will inform all CBs soon on this matter (the email on 09 August 2017).</p> <p>Sime Darby resubmitted LUCA to the RSPO secretariat on August 27, 2018. Sime Darby also sent an e-mail dated September 5, 2018. Based on email from RSPO Head of Certification on 23 May 2019 stated that "The RSPO secretariat has agreed to allow the NC raised on 7.3.1 to Sime Darby's units to be opened until the next ASA. Please proceed with the necessary process of certification".</p>			
<p><b>Root Cause Analysis (filled by organization audited):</b>  The unit has not received information from Sime Darby regarding the progress of LUCA PT TMP.</p>			
<p><b>Correction (filled by organization audited):</b>  The time line check list submission has been submitted LUCA Sime Darby (attached file)</p>			
<p><b>Corrective Action (filled by organization audited):</b>  Continue to update to Sime Darby to convey the progress of the LUCA PT TMP progress.</p>			
<p><b>Assessor Evaluation and Conclusion (filled by auditor):</b>  <b>Verification 14 October 2019</b></p>			

The company has shown evidence of communication with the RSPO Secretariat in May 09, 2019 which informed that there had been a meeting with the RSPO on May 8, 2019, at the meeting agreed:

*Considering the historical involvement and events (as presentation slides and documents attached), SDP is given a one year time extension period to address all outstanding matters (including the approval of compensation plan) related to non-conformity raised on 7.3.1 during the RSPO Re-certification/Annual Surveillance Audits for the affected units. (The timeframe of one year whether from May 2019 or maybe staggered according to the certification dates of each Unit of Certification will be advised by RSPO Secretariat.)*

**Auditor Conclusion 14 October 2019**

Based on that information, this NC has been closed until next assessment according to the RSPO Secretariat statement.

**Verified by : Andi Pratama Pasaribu**

**1.5.3 Opportunity for Improvement**

No	Ref. Std.	Description
1	2.2.1	Complete the enclave process so that the operational area matches the legal area.
2	5.2.4	Maximizing HCV area enrichment programs with woody plants.
3	6.5.2	The company has the opportunity to ensure that the types of work listed in the temporary work agreements are in accordance with the actual work in the field.

**3.5.4 Noteworthy Positive Components**

No	Descriptions
1	Management's commitment to implement sustainable palm oil development.
2	Staff and PIC competencies related to the implementation of sustainable palm oil.
3	Adoption of innovation in the use of mini tractors to facilitate harvesting activities.

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

Public Issues (Institution/ NGO/Community)	Auditor Responses
<p><b>Environment Agency</b></p> <p>PT. Tunggal Mitra Plantation has been fulfilled all the regulation related to environmental aspect so far. All the report of environmental monitoring based on those environmental permit submitted regularly such as RKL/RPL, hazardous waste, fire monitoring etc.</p> <p>There is no environmental issues reported by stakeholder so far.</p>	<p>As described in relevant criteria.</p>
<p><b>Plantation Agency of Bagan Siapi-api Regency</b></p> <p>The representative of Agency is simply refused and not willing to be interviewed by Mutuagung Lestari Auditor without any reason. Thus, information on PT TMP performance towards Agency perspective is not available.</p>	<p>Explained in interview notes.</p>
<p><b>Manpower &amp; Transmigration of Rokan Hilir Regency.</b></p> <ul style="list-style-type: none"> <li>Contact Person of this agency cannot give any information to auditors via telephone.</li> </ul>	<p>N/A</p>
<p><b>Labour Union Mill &amp; Estate (PUK SPSI)</b></p> <ul style="list-style-type: none"> <li>Labour Unions have been registered in the government agencies.</li> <li>Explanations related to workers' rights and those contained in the Collective Labor Agreement and Company Policies have been fully socialized to the workers.</li> <li>The mechanism for replacing damaged PPE is yet known by workers, so if the PPE given has been damaged before the next distribution period (giving PPE given once a year) then the worker will ask for a replacement from the company.</li> <li>All workers have been included in the BPJS Health and Employment program by the company.</li> <li>The company has set minimum wages for all workers in accordance with the stipulation of the Tapanuli Selatan Regency Sectoral Minimum Wage in 2019.</li> <li>Payment and calculation of overtime for workers is in accordance with the provisions stipulated by the government.</li> <li>During the past year there have never been any issues or incidents related to child labor, sexual harassment, discrimination and human rights violations in the company's operational environment.</li> </ul>	<p>Further explanation regarding the labour union is explained in criterion 6.6</p> <p>The company has implemented minimum wages and other labor regulations in accordance with applicable regulations and is explained in the 2.1.1 and 6.5.1 indicators</p>
<p><b>Committee Gender Mill &amp; Estate</b></p> <ul style="list-style-type: none"> <li>The routine activity of this organization is to conduct outreach and guidance to women workers and the children of workers so that they know their rights and obligations while at work and in the company.</li> </ul>	<p>Further explanation regarding the gender committee is explained in criterion 6.9</p>

Public Issues (Institution/ NGO/Community)	Auditor Responses
<ul style="list-style-type: none"> <li>• The socialization provided was in the form of socialization of company policies related to gender, reproductive rights, menstrual leave, maternity leave, prohibition of pregnant women and breastfeeding from working with chemicals.</li> <li>• During the past year there have never been any issues or incidents related to child labor, sexual harassment, discrimination and human rights violations in the company's operational environment.</li> <li>• The company carries out routine pregnancy checks to workers every three months, especially to female workers who work with chemicals (fertilizers and sprayers).</li> <li>• Workers understand the policies related to H1 leave (menstruation leave) and H2 leave (maternity leave) as well.</li> </ul>	
<p><b>Village Representatives from Sukajadi and Siarang-arang Village (Focus Group Discussion)</b></p> <p>Until this audit, there is no land dispute or environmental issues at least from 2018 – 2019. The company's has give the positive impact for the local communities through CSR programs such as job and business opportunity where half of the community member working at estate or mill, become a local contractor or wholesaler.</p>	<p>As described in relevant pinciple (2.2; 2.3 and 6.3)</p>
<p><b>Transporter CPO &amp; Kernel (PT Mitra Angkutan Sejati)</b></p> <ul style="list-style-type: none"> <li>• A work agreement for each job already exists and each party has it</li> <li>• Payment of the work done is timely paid</li> <li>• In the employment agreement explain related to PPE, Giving BPJS and other matters</li> <li>• Contractor workers are given supervision from the CH</li> <li>• Provision of socialization related to the company's code of ethics carried out at the time of signing the work agreement</li> <li>• Training / socialization related to work carried out by contractor workers has been carried out by the CH at the time of supervision</li> </ul>	<p>Based on document verification, show that the rights and obligation of each party has been set in the contract.</p> <p>Has been describe in criteria 6.10</p>

<b>4.0</b>	<b>CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY</b>				
<b>4.1</b>	<b>Formal Sign-off of Assessment Findings</b>				
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <table data-bbox="406 756 1299 871"><tr><td data-bbox="406 756 812 871">PT Tunggal Mitra Plantation Head of PSQM Minamas Plantation, Sime Darby Plantation Sdn Bhd</td><td data-bbox="812 756 1299 871">Mutuagung Lestari Lead Auditor</td></tr></table> <table data-bbox="438 945 1331 1186"><tr><td data-bbox="438 945 812 1186"> <b>Alagendran Maniam</b> Monday, 16 November 2019</td><td data-bbox="812 945 1331 1186"> <b>Andi Pratama Pasaribu</b> Monday, 16 November 2019</td></tr></table>	PT Tunggal Mitra Plantation Head of PSQM Minamas Plantation, Sime Darby Plantation Sdn Bhd	Mutuagung Lestari Lead Auditor	 <b>Alagendran Maniam</b> Monday, 16 November 2019	 <b>Andi Pratama Pasaribu</b> Monday, 16 November 2019
PT Tunggal Mitra Plantation Head of PSQM Minamas Plantation, Sime Darby Plantation Sdn Bhd	Mutuagung Lestari Lead Auditor				
 <b>Alagendran Maniam</b> Monday, 16 November 2019	 <b>Andi Pratama Pasaribu</b> Monday, 16 November 2019				



**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	Labour Agency Of Rokan Hilir Sistrict	Rokan Hiir District, Riau province		By phone	19 August 2019		√
2	National Land Agency of Rokan Hilir District	Rokan Hiir District, Riau province		By phone	19 August 2019		√
3	Environment Agency of Rokan Hilir District	Rokan Hiir District, Riau province		By phone	19 August 2019	√	
4	Plantation Agency of Rokan Hilir District	Rokan Hiir District, Riau province		By phone	19 August 2019	√	
5	WALHI	Jakarta	informasi@walhi.or.id	questionnaire	13 August 2019		√
6	Sawit Watch	Jakarta	info@sawitwatch.or.id	questionnaire	13 August 2019		√
7	Aliansi Masyarakat Adat Nusantara	Jakarta	rumahaman.cb.n.net.id	questionnaire	13 August 2019		√
8	World Wide Fund for Nature	Jakarta		questionnaire	13 August 2019		√
9	Local Communities  Suka Jadi Village (Village official, Public Figures, Previous land owner)  <i>Desa Perkebunan Siarang - arang</i> (Village official, Public Figures, Previous land owner)	Rokan Hiir District		Interview	22 August 2019	√	
10	Local Contractor  FFB and EFB (Sukajadi Village)  Transport CPO and Kernel (Representative of Dumai)	Rokan Hiir District		Interview	22 August 2019	√	
11	Gender Committee PT TMP	Rokan Hiir District		Interview	22 August 2019	√	
12	Labour Union (MGE and MGF)	Rokan Hiir District		Interview	22 August 2019	√	
13	Internal Stakeholder  Manggala Factory <ul style="list-style-type: none"> <li>• 3 grading officer</li> <li>• 1 loading ramp officer</li> <li>• 1 press officer</li> <li>• 1 engine operator</li> <li>• 1 boiler operator</li> <li>• 1 WTP officer</li> <li>• 1 warehouse officer</li> <li>• 2 mechanic</li> <li>• 4 firefighter officer</li> </ul>	Rokan Hiir District		Interview	20 - 21 August 2019	√	

<ul style="list-style-type: none"> <li>• 3 security</li> <li>• 2 weighbridge officer</li> <li>• 1 logistic clerk</li> </ul> <p>Manggala Estate</p> <ul style="list-style-type: none"> <li>• 6 pesticide applicator</li> <li>• 6 manuring worker</li> <li>• 3 residence on housing</li> <li>• 3 daycare worker</li> <li>• 1 BSS &amp; BMS officer</li> <li>• 3 Workshop worker</li> <li>• 1 Hazardous storage worker</li> <li>• 2 warehouse complex worker</li> </ul>	<p>Rokan Hiir District</p>		<p>interview</p>		<p>√</p>	
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**Appendix 2. Assessment Program**

DATE	19 – 24 August 2019	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
<b>Monday, 19 August 2019</b>		
08.30 – 10.20	<b>Jakarta → Pekanbaru</b> <b>Public Consultation with Related Agencies of Rokan Hilir Regency by Phone</b> <b>Pekanbaru → PT TMP</b>	All Team Member
10.20 – 12.00		All Team Member
12.00 – 19.00		All Team Member
<b>Tuesday, 20 August 2019</b>		
08.00 – 08.30	<b>Opening Meeting</b> Auditee Speech (Introduction of PIC, Profile of Mill and Estate Management and Unit)  Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Determine of Field Visit, Transparency and Confidentiality Clarification).	All Team Member  All Team Member
08.30 – 12.00	<b>Field Observation to Manggala 1 Estate</b> <ul style="list-style-type: none"> <li>Legal Operational &amp; Conservation Area (All Estate)</li> <li>Best agricultural practices (manuring, spraying, harvesting, EFB application etc).</li> <li>Worker Welfare (payments, complaint mechanism).</li> <li>Hazardous Waste Material (B3) management; Worker facilities (housing, health clinic, clean water, etc), Land Fill, and Fire Fighting Facilities, Storage, ect.</li> </ul>	APP MAH MAH RGR
12.00 – 14.00	<b>BREAK</b>	All Team Member
14.00 – 17.00	<b>Field Observation to Manggala POM</b> <ul style="list-style-type: none"> <li>Supply Chain verification.</li> <li>FFB Receiving, Weighbridge, FFB Sorting, Processing Activity, Despatch CPO – Include OHS Aspects (firefighting simulation).</li> <li>Occupational Health &amp; Safety Aspect.</li> <li>Environmental, Inspection to Chemical Storage, Hazardous Waste Storage, WWTP etc.</li> </ul>	APP MAH/RGR MAH/RGR MAH/RGR
<b>Wednesday, 21 August 2019</b>		
08.00 - 12.00	<b>Field Observation Manggala 2 Estate</b> <ul style="list-style-type: none"> <li>Best agricultural practices (manuring, spraying, harvesting, EFB application etc)</li> <li>Worker Welfare (payments, complaint mechanism)</li> <li>Hazardous Waste Material (B3) management; Worker facilities (housing, health clinic, clean water, etc), Land Fill, and Land Fire facilities, Storage, ect.</li> </ul> <b>Field Observation Manggala 3 Estate</b> <ul style="list-style-type: none"> <li>Best agricultural practices (manuring, spraying, harvesting, EFB application etc)</li> </ul>	MAH/RGR MAH/RGR MAH/RGR  APP

DATE	19 – 24 August 2019	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
	<ul style="list-style-type: none"> <li>Worker Welfare (payments, complaint mechanism).</li> <li>Hazardous Waste Material (B3) management; Worker facilities (housing, health clinic, clean water, etc), Land Fill, and Land Fire facilities, Storage, ect.</li> </ul>	<p>APP</p> <p>APP</p>
12.00 – 14.00	<b>BREAK</b>	All Team Member
14.00 – 17.00	<b>Document Review</b>	All Team Member
<b>Thursday, 22 August 2019</b>		
08.00 – 12.00	<b>Public consultation:</b> Internal Stakeholder (Labor Union & Gender Committee) and Local Contractor Local communities & Previous Land Owner	<p>RGR/MAH</p> <p>APP</p>
12.00 – 14.00	<b>BREAK</b>	All Team Member
14.00 – 17.00	<b>Document Review</b>	All Team Member
<b>Friday, 23 August 2019</b>		
08.00 – 10.00 10.00 – 16.00	<b>Closing meeting</b> PT TMP → Pekanbaru	<p>All Team Member</p> <p>All Team Member</p>
<b>Saturday, 24 August 2019</b>		
11.00 – 13.00	<b>Pekanbaru → Jakarta</b>	All Team Member