

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

[✓] Surveillance

Name of Management Organisation : **Berangir Palm Oil Mill subsidiary of PT Perkebunan Nusantara IV**

Plantation Name : **Berangir Estate**

Location : Village of Perkebunan Berangir, Sub District of NA IX-X, District of Labuhanbatu Utara, Province of Sumatera Utara, Indonesia

Certificate Code : **MUTU-RSPO/118**

Date of Certificate Issue : 20 July 2018

Date of License Issue : 01 Oktober 2019

Date of Certificate Expiry : 19 July 2023

Date of License Expiry : 19 July 2020

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-1	17 to 20 June 2019	Leonada (Lead Auditor), Asystasya Aishah Silalahi, Hasiholan Sihombing, Bayu Yogatama	Taufik Margani	Octo HPN Nainggolan

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-1	16 September 2019

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Figure 1. Location Map of PT Perkebunan Nusantara IV Berangir Business Unit

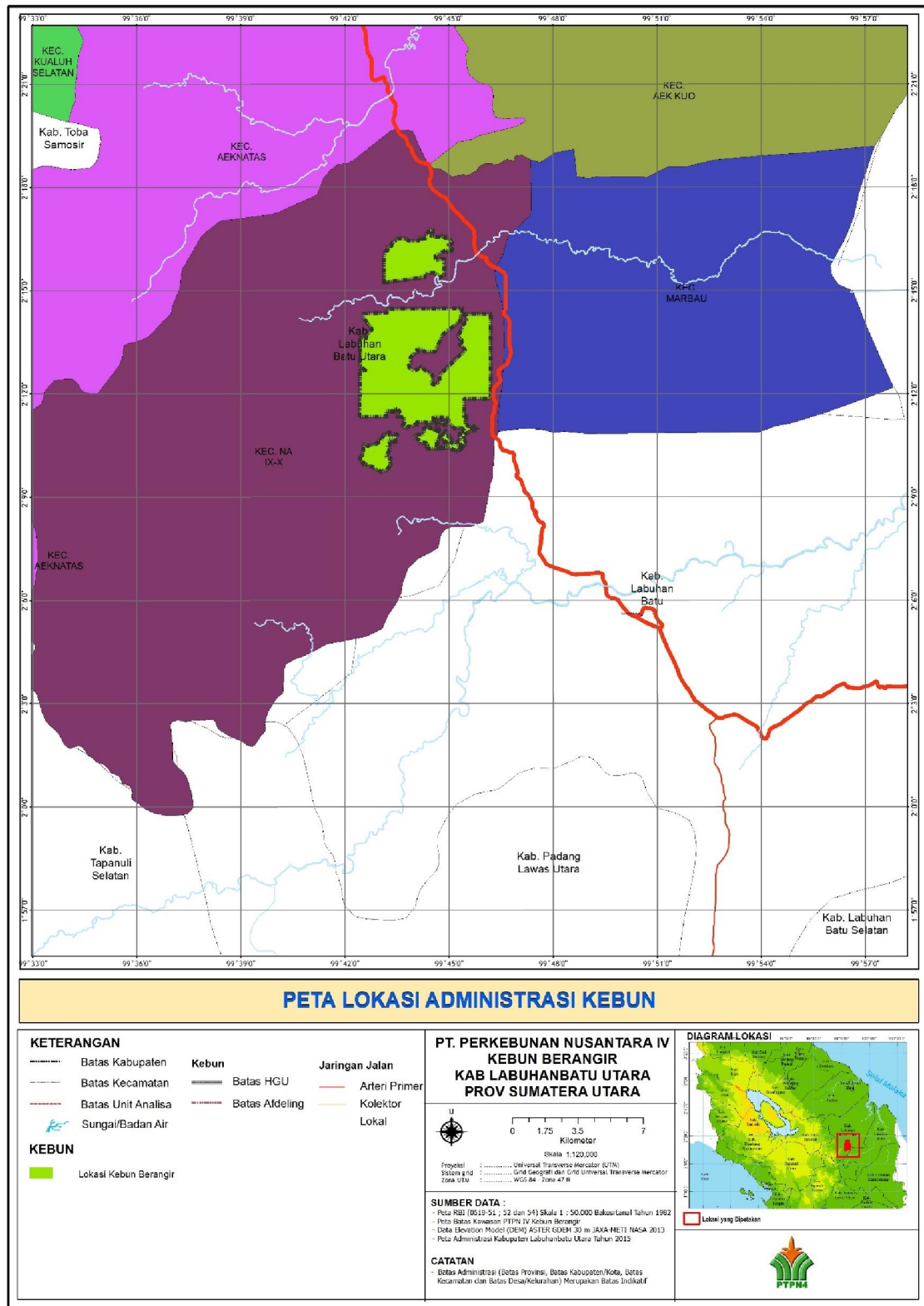
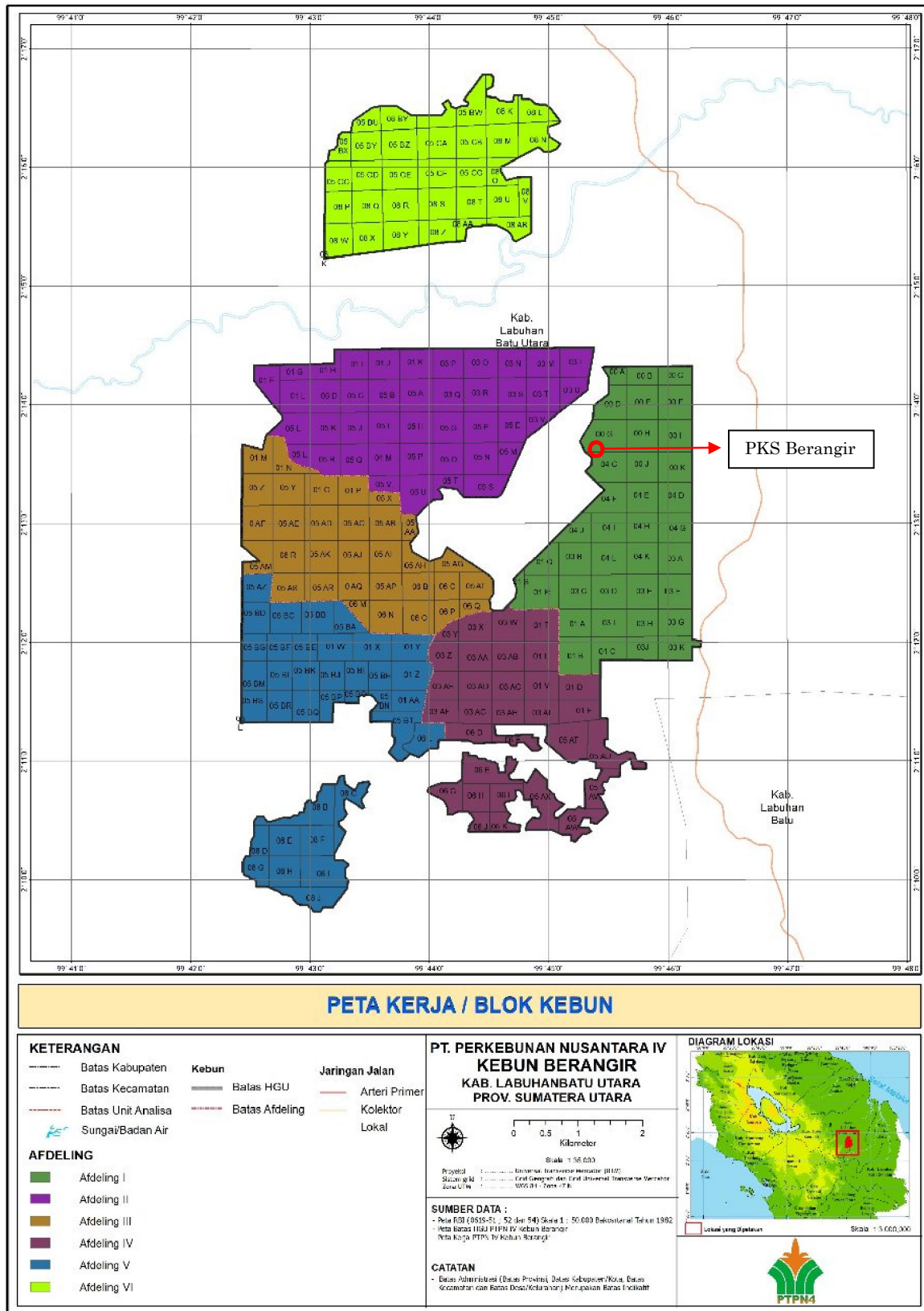


Figure 2. Operational Map of Berangir Business Unit



Abbreviations Used

ASA	:	Annually Surveillance Assesment
ASEAN	:	Association of Southeast Asian Nations
BOD	:	Biological Oxygen Demand
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial / Social Security Agency</i>
CB	:	Certification Body
CH	:	Certificate Holder
CPO	:	Crude Palm Oil
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm Oil
CSR	:	Corporate Social Responsibility
EFB	:	Empty Fruit Bunch
EIA	:	Environment Impact Assesment
FFB	:	Fresh Fruit Bunch
FR	:	Frequency Rate
GHG	:	Greenhouse Gas
HCV	:	High Conservation value
HGU	:	<i>Hak Guna Usaha (Land Use Permit)</i>
IPM	:	Integrated Pest Management
KER	:	Kernel Extraction Rate
LSU	:	Leaf Sampling Unit
MSDS	:	Material Safety Data Sheet
NC	:	Non Compliance
OER	:	Oil Extraction Rate
OHS	:	Occupational Health and Safety
OSH	:	Occupational, Safety, and Healthy
P & C	:	Principle and Criteria
P2K3	:	<i>Panitia Pembina Keselamatan dan Kesehatan Kerja/OHS Commitee</i>
PIC	:	Person In Charge
PK	:	Palm Kernel
PKB	:	<i>Perjanjian Kerja Bersama (Collective Labour Bargaining)</i>
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PPE	:	Personal Protective Equipment
PTPN	:	<i>Perusahaan Terbatas Perkebunan Nusantara</i>
RKL/RPL	:	<i>Rencana Pengelolaan Lingkungan / Rencana Pemantauan Lingkungan</i>
RSPO	:	Rountable Sustainable Palm Oil
RWT	:	Raw Water Tank
SCCS	:	Supply Chain Certification Standard
SIA	:	Social Impact Assessment
SOP	:	Standard Operational Procedures
SPBUN	:	<i>Serikat Pekerja Perkebunan (Worker Union)</i>
SPO	:	Standard Procedure Operational
SR	:	Severity Rate
SSU	:	Soil Sampling Unit
WTP	:	Water Treatment Plant
WWTP	:	Waste Water Treatment Plant

1.0	SCOPE of the CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used	<ul style="list-style-type: none"> • Indonesian National Interpretation of RSPO Principles and Criteria (P&C) 2013 by INANITF July 2016, endorsed by the RSPO Board of Governors on September 30th 2016. • RSPO Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014 revised on 14 June 2017 (Module D / E for CPO Mill) • RSPO Certification System for Principles and Criteria, 14 June 2017 	
1.2	Organisation Information		
1.2.1	Organisation name listed in the certificate	PT Perkebunan Nusantara IV	
1.2.2	Contact person	Dhanny Hermawan	
1.2.3	Organisation address and site address	<ul style="list-style-type: none"> • Head Office registered in RSPO: Jalan Suprpto No. 2 Medan, Sumatera Utara, Indonesia • Office of Application RSPO proposal: Jalan Suprpto No. 2 Medan, Sumatera Utara, Indonesia 	
1.2.4	Telephone	(62-61) 415 4666	
1.2.5	Fax	(62-61) 457 3117	
1.2.6	E-mail	ptpnusantara4@ptpn4.co.id	
1.2.7	Web page address	www.ptpn4.co.id	
1.2.8	Management Representative who completed the application for certification	Khayamuddin Panjaitan	
1.2.9	Registered as RSPO member	1-0082-09-000-00 29 June 2009	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Berangir Palm Oil Mill and Berangir Estate	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			Latitude Longitude
	Berangir	Village of Perkebunan Berangir, Sub District NA IX - X, District Labuhanbatu Utara Province Sumatera Utara, Indonesia	N 02° 13' 29" E 99° 45' 37"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			Latitude Longitude

	Berangir Estate	Viilage of Perkebunan Berangir, Sub District NA IX - X, District Labuhanbatu Utara Province Sumatera Utara, Indonesia		N 02° 13' 20"	E 99° 46' 35"		
1.5	Description of Area Statement						
1.5.1	Tenure						
	• State			4,583.67 Ha			
	• Community			- Ha			
1.5.2	Area Statement						
	• Total area			4,583.67 Ha			
	• Planted (All Mature area)			4,015.26 Ha			
	• Mill			7.79 Ha			
	• Effluent pond			7.00 Ha			
	• Warehouse/Store			2.40 Ha			
	• Workshop			0.52 Ha			
	• Emplishment (housing)			69.75 Ha			
	• HCV			208.64 Ha			
	• Mosque and Church			2.25 Ha			
	• School building			2.50 Ha			
	• Infrastructure (road and dranage system)			267.56 Ha			
1.6	Planting Year and Cycles						
1.6.1	Age profile of planting year						
	Planting Year	Hectarage (Ha)					
		Berangir Estate			Total		
	2000	175.71			175.71		
	2001	512.41			512.41		
	2003	732.00			732.00		
	2004	263.50			263.50		
	2005	1,617.35			1,617.35		
	2006	226.57			226.57		
	2008	487.72			487.72		
	TOTAL	4,015.26			4,015.26		
1.6.2	New Planting area after January 2010		- Ha				
1.6.3	Planting Cycle		2 nd Cycle				
1.7	Description of Mill and Supply Base						
1.7.1	Description of Mill						
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel	
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)
	Berangir POM	30	156,037.27	35,625.09	22.83	6,965.06	4.46

	<i>*Production data source from June 2018 until May 2019</i>						
1.7.2	Description of Certification Scope of Supply Base						
	Name of Estate	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ ha/year)	Supplied to Mill	
						FFB (tonnes/year)	%
	Berangir Estate	4,583.67	4,015.26	108,969.88	27.14	108,969.88	100
	TOTAL	4,583.67	4,015.26	108,969.88	27.14	108,969.88	100
	<i>*Production data source from June 2018 until May 2019</i>						
1.7.3	FFB description from other source						
	Name of sources/Organisation (RSPO certified / non- certified)	Type of Organisation	number of smallholders	Production Area (Ha)	Supplied to Mill		
					FFB (tonnes/year)		
	Meranti Paham Estate (RSPO Non-Certified)	PT Perkebunan Nusantara IV Unit Ajamu	-	4,455.00	43,890.01		
	Ajamu (RSPO Non- Certified)	PT Perkebunan Nusantara IV Unit Ajamu	-	4,189.00	2,690.85		
	Panai Jaya (RSPO Non- Certified)	PT Perkebunan Nusantara IV Unit Ajamu	-	3,124.00	486.53		
	TOTAL					47,067.39	
	<i>*Source Production Data from June 2018 until May 2019</i>						
1.7.4	Product categories			FFB, CPO, PK			
1.8	Tonnage of Product						
1.8.1	Past Annual Claim Certified Product		Previous Certificate Claim 20 July 2018 to 19 July 2019 (tonnes/year)		Actual certified product** 20 July 2018 to June 2019 (tonnes/year)		
	FFB Processed		110,183		100,178		
	CPO Production		26,664		23,990		
	Palm Kernel (PK) Production		5,492		4,773		
	<i>*CSPO and CSPK extended volume approved on 20 June 2019 due to an additional production from certified product</i> <i>*Actual certified period not 12 months before audit because unit stated certified start on 20 July 2018.</i>						
1.8.2	Product selling						
	Type of selling product		Actual selling product for last year (MT)				
	CSPO sold as RSPO certified product		1,500				
	CSPK sold as RSPO certified product		1,405				
	CSPO sold under other scheme		0				
	CSPK sold under other scheme		0				
	CSPO sold as conventional		20,277				
	CSPK sold as conventional		0				
1.8.3	Estimate of Certified FFB Claim						
	Name of Estate(s)	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)		Yield (tonnes/ha/year)	
	Berangir Estate	4,583.67	4,015.26	115,000		28.64	

	TOTAL		4,583.67	4,015.26		115,000		28.64
*Projected FFB production for 12 months of certificate (20 July 2019 – 19 July 2020)								
1.8.4	Estimate of Certified Palm Product Claim							
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel		Supply Chain Module
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)	
	Berangir POM	30	115,000	26,500	23.04	5,500	4.78	MB
*Projected CSPO and CSPK production for 12 months of certificate (20 July 2019 – 19 July 2020)								
1.9	Other Certifications							
	ISO 9001:2008			-				
	ISO 14001: 2004			-				
	OHSAS 18001:2007			-				
	ISPO			From Tuv Nord Indonesia with certificate No. TNI.ISPO-L-1612 (Valid from 6 December 2016 until 5 December 2021				
	SMK3			From Ministry of Manpower with Certificate No. KEP.201/MEN/VII/2017, valid from July 2017 until 2020				
1.10	Time Bound Plan							
1.10.1	Time Bound Plan for Other Management Units							
	Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status		
	MILL	Time Bound Plan						
	Pabatu	2015	Pabatu	2015	Serdang Bedagai, Sumatera Utara	Certified		
		2018	KCP Pabatu	2018		Certified		
	Dolok Ilir	2015	Dolok Ilir	2015	Simalungun, Sumatera Utara	Certified		
			Laras	2018	Simalungun, Sumatera Utara	Certified		
	Pulu Raja	2015	Pulu Raja	2015	Asahan, Sumatera Utara	Certified		
	Adolina	2018	Adolina	2018	Serdang Bedagai and Deli Serdang, Sumatera Utara	Certified		
	Bah Jambi	2018	Bah Jambi	2018	Simalungun, Sumatera Utara	Certified		
			Marihat	2018	Simalungun, Sumatera Utara	Certified		
			Bah Birung Ulu	2021	Simalungun, Sumatera Utara	ST-1		
			Marjandi	2019	Simalungun, Sumatera Utara	Certified		
			Marjandi HGU on process (30 Ha)	2021	Simalungun, Sumatera Utara	-		
	Dolok Sinumbah	2018	Dolok Sinumbah	2018	Simalungun, Sumatera Utara	Certified		

			Dolok Sinumbah HGU on progress (35.94 Ha)	2021	Simalungun, Sumatera Utara	-
			Balimbangan	2018	Simalungun, Sumatera Utara	Certified
Mayang	2018		Mayang	2019	Simalungun, Sumatera Utara	Certified
			Bukit Lima	2019	Simalungun, Sumatera Utara	-
Gunung Bayu	2019		Gunung Bayu	2019	Simalungun, Sumatera Utara	IC
			Tanah Itam Ulu	2019	Simalungun, Sumatera Utara	IC
Tinjowan	2018		Tinjowan	2018	Simalungun, Sumatera Utara	Certified
			Aek Nauli	2018	Simalungun, Sumatera Utara	Certified
			Padang Matinggi	2018	Simalungun, Sumatera Utara	Certified
Air Batu	2018		Air Batu	2018	Asahan, Sumatera Utara	Certified
			Air Batu HGU on progress (459.02 Ha)	2021	Asahan, Sumatera Utara	-
Berangir	2018		Berangir	2018	Labuhan Batu Utara, Sumatera Utara	Certified
			Berangir HGU on progress (10 Ha)	2021	Labuhan Batu Utara, Sumatera Utara	-
Sawit Langkat	2018		Sawit Langkat	2018	Langkat, Sumatera Utara	Certified
			Sawit Langkat HGU on progress (301.50 Ha)	2021	Langkat, Sumatera Utara	-
Pasir Mandoge	2021		Pasir Mandoge	2021	Asahan, Sumatera Utara	ST-1
			Sei Kopas	2021	Asahan, Sumatera Utara	ST-1
			Tonduhan	2021	Simalungun, Sumatera Utara	ST-1
Timur	2021		Timur	2021	Mandailing Natal, Sumatera Utara	-
			Balap	2021	Mandailing Natal, Sumatera Utara	-
Ajamu	2019		Ajamu	2019	Labuhan Batu Utara, Sumatera Utara	IC
			Meranti Paham	2019	Labuhan Batu Utara, Sumatera Utara	IC
			Panai Jaya	2021	Labuhan Batu Utara, Sumatera Utara	-
Sosa	2021		Sosa	2021	Padang Lawas, Sumatera Utara	-
PT Agro Sinergi Nusantara			PT Agro Sinergi Nusantara	2021	Aceh Barat, Aceh	-

	PT Sinergi Perkebunan Nusantara		PT Sinergi Perkebunan Nusantara	2021	Morowali Utara, Sulawesi	-
	Time bound plan April 2019 signed by head of plan and development department (Sustainability)					
1.10.2	Progress of Associated Smallholders and Outgrowers for Certifiable Standard					
	PTPN IV – Berangir Unit have no smallholders scheme or outgrowers.					

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-1	<p>1. Leonada (Lead Auditor). Bachelor of agriculture for plant breeding and seed technology programme study, department of agronomy, faculty of agriculture in Bogor Agricultural University. Having experience of more than five years working as a plantation operations staff and sustainability in private company of Indonesian oil palm plantations and is currently working on independent certification bodies as auditor. Training have been followed are: training of Indonesian sustainable palm oil (ISPO) lead auditor, training of RSPO lead auditor, RSPO SCCS training, SA 8000, ISO 17021; 2011, ISO 17065; 2012, ISO 19011; 2011, lead auditor ISO 9001; 2008, ISO 14001; 2005, training of management development program agronomy, training of analysis base solution for operation, training of integrated pest management (IPM), use of limited pesticides training, training management of waste pesticides and fertilizers, training mediation and conflict resolution, RSPO social and worker welfare training, general safety specialist training, health and safety management system (SMK3) auditor. In this audit He conducted an assessment on Legal and land dispute.</p> <p>2. Hasiholan Sihombing (Auditor). Indonesian citizen. Bachelor of Agriculture Majoring in Agronomy, Agriculture Faculty. He has working experienced for 7 (seven) years since 2009 as an Operational Staff in an Oil Palm Plantation Company in Indonesia. The training he has followed namely: Lead Auditor ISPO, RSPO P&C Lead Auditor Course by Checkmark, SA 8000 Awareness, Quality Management Systems (ISO 9001:2015), Environmental Management Systems (ISO 14001:2015), OHS General Expert, OHSAS 18001:2007, ISO 19011:2018, ISO 17021:2011 and ISO 17065:2012. He has experienced in various audit activities related to the certification system of sustainable palm oil plantation since 2016. During this audit, he assigned to verify best management practices, long term plan, OHS aspects.</p> <p>3. Asystasya Aishah Silalahi (Auditor). Indonesia Citizen, Bachelor of Economy, Major of Agribusiness, Faculty of Economic and Management. She has one year experience in consultancy. She has followed training such as ISPO Auditor Training, Lead Auditor ISO 9001:2015, OHS General Expert, RSPO lead auditor training course, SCCS, and several in house training related to environmental, BMP, SA 8000, etc. Has been involved in several audit activities since 2016 related to sustainable palm oil certification covering waste management aspect, Social Aspect, Health and Safety Aspect, and Worker Welfare. During this audit, she verify Social, transparency, and Worker Welfare aspects and SCCS.</p> <p>4. Bayu Yogatama (Auditor). Bachelor of Forestry, Department of Forest Resources Conservation and Ecotourism, Bogor Agricultural University. Has attended the ISO 9001: 2015 Quality Auditor / Lead Auditor Course Quality Management System (QMS) course and ISO 19011: 2011 Guidelines for Auditing Management System, ISPO Lead Training, SA 8000, RSPO Lead Training, IHT RSPO NPP, IHT RSPO RaCP, IHT ISO 17021, and IHT ISO 17065. Having experience working in plywood field as Inspector in foreign private company. Currently working for an independent certification body. During this audit, he verify Environmental Aspect, HCV, and Green House Gases.</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA-1	<p>Number of auditors: 4 Auditor</p> <p>Number of days for ASA-1 at site: 4 days.</p> <p>Number of working days for ASA-1 at site: 16 Working days.</p>
2.2.2	Assessment Process
ASA-1	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Perkebunan Nusantara IV Berangir Business Unit to the requirements of RSPO Principles and Criteria for Sustainable Palm Oil Production and Supply Chain Requirement for CPO Mill Berangir POM (Module E).</p> <p>From morning until afternoon, the team traveled from Jakarta to Medan by plane and travel to site by car, then continued with the opening meeting. The opening and closing meeting was held in the Meeting Room attended by the Estate Manager, Mill Manager, Assistants, and other related personnel's. During audit activity, auditors always accompanied</p>

by client and the documents are presented well.

The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) *interview*, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site.

Some opportunities for improvement of the results **ASA-1** delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase (**ASA-2**).

Improvement of findings from main assesment findings were observed by auditors at this **ASA-1** assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of **ASA-1**.

The assessment program please find Appendix 2

2.2.3 Locations of Assessment

ASA-1

Berangir POM

- **Weighbridge.** Observation and interview related to workers walfare, safety aspect and FFB received procedure
- **Loading Ramp (2 workers).** Observation and interview with sortation personnel related to understanding over sortation procedure, the implementation of sortation, fruit criteria, fruit separation with ripeness and rawness criteria.
- **Sterilizer Station (1 worker).** Observation and interview with operator related personnel understanding over the applicable SOP, infrastructure in mill, the implementation of occupational health and safety, medical examination, trainings from company and worker welfare.
- **Press Station (1 worker).** Observation and interview with operator related personnel understanding over the applicable SOP, infrastructure in mill, the implementation of occupational health and safety, medical examination, trainings from company and worker welfare.
- **Boiler Station (3 workers).** Observation and interview with operator related personnel understanding over the applicable SOP, infrastructure in mill, the implementation of occupational health and safety, medical examination, trainings from company and worker welfare.
- **Engine Room Station (1 worker).** Observation and interview with operator related personnel understanding over the applicable SOP, infrastructure in mill, the implementation of occupational health and safety, medical examination, trainings from company and worker welfare.
- **Kernel Station (1 worker).** Observation and interview with operator related personnel understanding over the applicable SOP, infrastructure in mill, the implementation of occupational health and safety, medical examination, trainings from company and worker welfare.
- **Hydrant.** Observe and simulate emergency response.
- **Chemical storage.** Observation about storage condition and interview with storage officer about worker welfare, OSH implementation, complaint mechanism.
- **Hazardous waste storage.** Observation about storage condition, waste management, and interview with officer about worker welfare, OSH implementation, complaint mechanism.
- **Fuel tank.** Observation about tank condition and emergency response facility.
- **Water treatment plant.** Interview with operator about job description, worker welfare, OSH implementation.
- **Workshop.** Observation about workshop condition and interview with foreman about waste management, worker welfare, and OSH implementation.
- **WWTP.** Observation and Interview operator related WWTP ponds and flowmeter condition.
- **Security.** Observation and interview related the understand of SCCS.
- **Pesticide Warehouse** Observation and interview related knowledge on handling pesticide, mixing pesticide and completeness of facilities

Berangir Estate

- **HGU stakes No. 18, 19 and 20 block 05BN.** Observation on boundaries poles, coordinates, maintenance, and demarcation.
- **HCV Area of water springs block 05H.** Observation of HCV management.

- **HCV Area of Titi Gambang riparian block 01Z.** Observation of HCV management.
- **Block 05E Division 2 (3 Pesticide Applicator).** Observation on safe working practices and interview with the spraying workers related type of pesticides use according to the procedure and also worker welfare.
- **Block 04G Division 1 (3 harvester).** Observation and interview with harvester related fruit ripeness, safe working practices and also worker welfare.
- **Block 01T Division 4 (2 harvester).** Observation and interview with harvester related fruit ripeness, safe working practices and also worker welfare.
- **Block 12AJ Division 4 (Manual weeding - 9 fertilizer worker).** Field observations on manual weeding by fertilizer workers and interview with the worker related to the procedure, safety and health and also worker welfare.
- **Block 06F Division 4 (Steep slope area – terrace area).** Field observations on steep slope area and management strategy for plantings on that area.
- **Housing complex of Afdeling 3.** Observation about house condition and interview with residents about other facilities for worker, domestic waste management.
- **Rinse house and PPE storage, Afdeling 3.** Observation about storage condition and waste management.
- **Water pump house.** Observation about house condition and interview with worker about worker welfare, OSH implementation, complaint mechanism.
- **Housing complex of Afdeling 5.** Observation about house condition and other facilities.
- **Clinic.** Observation and interview related management of medical waste, work accident and medical check-up.
- **Fertilizer warehouse** Observation and interview related knowledge on handling hazardous material, and hazardous waste.
- **Land Application Block 00H and 00J** Observation and Interview related POME Management, PPE and working hours

Surrounding Villages

- **Sei Raja Village.** Interview land issues, environment, social etc.
- **Simpang Merbau Village.** Interview land issues, environment, social etc.

2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ASA-1	<p>Consultation of stakeholders for PT Perkebunan Nusantara IV Berangir Business <i>Unit</i> was held by:</p> <ul style="list-style-type: none"> • Public Notification on May 29th 2019 at Certification body website. • Consultation with NGO (Sawit Watch, WWF, Walhi and AMAN) via email on June 12th 2019. • Consultation with government Agencies of Labuhanbatu Utara Regency , i.e. Environment Agency, Manpower and Industrial Agency and Agriculture Agency on June 18th 2019. • Public consultation by interview with locals of the nearby village (Sei Raja Village & Simpang Merbau Village) June 18th 2019. • Consultation meeting and interview with Internal Stakeholder (labour union, gender committee and local contractor) on June 18th 2019. <p>Numbers of input from stakeholders were clarified by PT Perkebunan Nusantara IV Berangir Business</p>
2.3.2	Stakeholder contacted
	<i>Please find appendix 1</i>
2.4	Determining Next Assessment
ASA-1	The next visit ASA-2 will be determined 8 to 12 month year after certificate issued

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Berangir POM – PT Perkebunan Nusantara IV. Operation consisting of one (1) mill and one (1) oil palm estates.

During the assessment, there were four (4) Nonconformities were assigned against Major Compliance Indicator; one (1) Nonconformity Minor raised to Major; two (2) nonconformities were assigned against Minor Compliance Indicators; and three (3) opportunities for improvement were identified.

Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5. The company has already prepared and implemented the corrective action(s) that had been reviewed and accepted by Auditor(s) in form of documentation evidence(s) e.g. document record, photographic, etc. Those corrective actions taken that consist of five (5) Major non-conformities had been closed out shall be verified during next assessment.

MUTUAGUNG LESTARI found that Berangir POM – PT Perkebunan Nusantara IV complied with the requirements of RSPO Principles & Criteria and National Interpretation, RSPO Principles and Criteria (P&C) for Sustainable Palm Oil Production, Republic of Indonesia - RSPO INA-NIWG, 2013 by INA-NITF July 2016, endorsed by the RSPO Board of Governors on September 30th 2016 and RSPO Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014 (Module D/E for CPO Mill) – Revised on June 2017.

Therefore MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is continued

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
PRINCIPLE #1 COMMITMENT TO TRANSPARENCY		
1.1 Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.		
1.1.1	<p>Company has the latest list of stakeholder period of 2019, consist of statutory bodies (National, Province, Regency, Sub-District), local communities, worker organization, youth organization. Besides, there also list of information that can be accessed by public listed on Director Decree No. 04.03/Kpts/02/II/2018 about publication of company documents. Information that can be accessed by public such as environment, social, legality, OSH, worker welfare document, and so on. Based on interview with statutory bodies in Labuhan Batu Utara Regency, stakeholders also can access the company's documents, such as company's policies, licensing, reporting, and so on. They also know the mechanism and person in charge for communication with stakeholder.</p> <p>Company also reported mandatory report to related agencies, for example:</p> <ul style="list-style-type: none"> - Land Use Report of PTPN IV Berangir period of 2018 to Land National Agency of Labuhan Batu Utara Regency on 15 March 2019. - Employee Report period of 2018 by online on 13 June 2019. 	
1.1.2	<p>Mechanism to respond information request listed in procedure of <i>Masa Simpan Permintaan Informasi dan Tanggapan</i> No SPO 06 on 1 August 2017. Based on procedure, time limit to respond information request from stakeholder is 30 days. Company recorded all incoming letter, its respond, in Recapitulation of Internal and External Communication. For example: A letter from Election Commission of the Labuhan Batu Utara Regency dated February 7, 2019 regarding a request to provide a place for data collection on special voter list for employees who have not been registered. The company then replied to the letter dated February 23, 2019</p>	

with the contents willing to provide a place and time.

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

Company has list of document that can be accessed publicly, such as:

- Company profile
- Annual report
- Land use title
- CSR data
- SIA document
- HCV document
- Complaint and its respond
- And so on

Public document also can be seen in notice board, such as company's vision and mission, public report, or company's website. Based on interview with representative of Sei Raja and Simpang Merbau Village and related agencies of Labuhanbatu Utara Regency, it is known that they are aware of public document and don't have difficulty to access it.

These documents are available in estate and mill office. Company also has monitoring and management report, such as OSH implementation report, report of environmental management and monitoring plan, land use report, and plantation activities report. These documents also can be accessed by public through the mechanism which has determined by the company.

Status: Comply

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

1.3.1

The company has a code of conduct that was signed by the Commissioner and President Director in November 2013. The code of conduct regulates conduct guidelines relating to conflicts of interest, bribery, political activities, drugs and gambling, business entertainment, gifts, souvenirs, donations, and disgraceful acts which constitute a prohibition for business actors. This policy is available in Indonesian Language. Based on interview with worker in estate and mill, it is known that they understand about the ethical conduct of the company and has been socialized on 25 January 2019. And also, based on interview with local contractor, company has socialized this policy whenever there is renewal work agreement and then delivered to each contractor worker.

Status: Comply

PRINCIPLE #2 COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS

2.1 There is compliance with all applicable local, national and ratified international laws and regulations.

2.1.1

The Company has list of regulations of 2019 that includes local regulations and national regulation updated annually. List of laws/regulations listed has covers several aspects such as land permit and legality, manpower, occupational health and safety, best management practices and environment. The company has shown the evidence of legal requirements compliance such as plantation bussines permit from head of district of Labuhan Batu No. 503/2159/Tapem/2012. The other compliances of regulations are regarding to environment aspects are EIA management and monitoring in routinely, hazardous waste storage license approved by local government. Compliances of workers and OHS regulations are provided the minimum wage, company safety & occupational health, transporting and forklift operator etc. At ASA-1, the company does not have a plantation bussiness permit for mill processing, but the company has received the RSPO certificate on 20 July 2018. So this matter becomes opportunity for improvement to the company to be able to complete the progress of plantation bussiness permit for mill (OFI).

Based on interview with stakeholders such as government agencies and other stakeholders such as workers union and surrounding communities it is known that the company has comply the related regulations for example: land use right, no workers under age of 18, land application permit, hazardous waste storage permit, there is no environment issues etc.

2.1.2, 2.1.3 & 2.1.4

Procedure of legal requirement which presented in document No. 04.01/KOL/P/034, dated 1 August 2018 mentioned that corporate legal officer, general and human resource assistant manager has responsibility to arranged and monitored legal related laws and/or regulation. The procedure mentioned that in order to monitor and update of laws and/or regulations, the corporate legal officer required to actively check and make coordination with Government Agencies or Institutions. Internal audit of regulations compliance are conducted annually as example on 3 May 2019. The internal audits have shown the company's compliance of legal requirements according to the list of regulations 2019.

Status: Comply

2.2

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

2.2.1

PTPN IV – Berangir has managed totaling area for about 4,592.79 Ha, which consist of 4,583.67 Ha as scope of certification and 9.12 Ha that out of certification scope and has planned to be certified in 2021 (describe at time bound plan on basic info 1.10.1). Berangir Unit has managed since 1974, which previously was owned by PT Wongso Rubber Coy, a rubber plantation company. The land acquisition processed by previous owner, began with land acquisition from communities area by providing compensation in 1977, continued by Berangir Unit and finished in 2005. The company then get the land use title for 4,583.67 Ha (scope of certification) which are:

1. HGU Certificate No. 48 for areas 3,288.93 ha which valid until 30December 2034
2. HGU Certificate No. 22 for area 1,294.74 ha which valid until 19 September 2043

2.2.2

Procedure of legal boundary poles monitoring and maintenance is presented in document No.SPO 12.0 (Revision 2) dated 2 January 2015. Procedure describes the person in charge of the boundary poles, the action to be taken if the pole is damaged/lost and the monitoring period were performed every 6 months. Based on the verification on this ASA, it is known that the company currently still does not have the HGU benchmark coordinates from the land agency. The company has coordinated with the land agency but the land agency still not been able to issue the HGU coordinates of the Berangir unit. Evidence of coordination is shown in the meeting document with the land agency of North Sumatra provincial on 15 April 2019. The results of the meeting included the statement that the land agency was unable to issue coordinates before the extension of the HGU. Then the company can determine the coordinate point internally which refers to the HGU map.

Based on the map of land area No. 11/12/2009 dated 14 August 2009 it was found that the HGU boundary stakes consisted of 45 stakes and based on map No. 10/12/2007 it is known that the HGU boundary stakes consist of 124 stakes, so the total stakes are 169 stakes. However, based on the monitoring of stakes carried out by the company there are 451 stakes that have not been identified with the gap between HGU stakes and auxiliary stakes. Monitoring the stakes is also accompanied by cartesian coordinates (x, y axis).

Based on the field observation, there is found a stakes No. 18, 19 and 20 blocks 05 BN in good condition and well maintained. However, the position of stakes in the field is not yet in accordance with the form of the post position on the map (field map No.11/12/2009). Based on the results of verification at ASA 1, it can be concluded that the company has not been able to show evidence of HGU stake inventory (number of stakes and coordinates) according to the HGU stake map and the actual position of HGU stakes in the field is not in accordance with the HGU stake map, so this becomes a recurring non conformity in indicators of **2.2.2 (NC 2018.03 minor raised to major).**

2.2.3, 2.2.4, 2.2.5, 2.2.6

The Company has established the mechanism for conflict resolution and land dispute in the procedure No. SOP 04 rev 02 dated 2 January 2015. There was also available a policies explained in the Code of Conduct company that the company did not use force to

maintain peace and order. Based on interview with communities and field observations, there were no significant land disputes and no indication of contractually army or paramilitaries using in plantation area of PTPN IV – Berangir unit.

2.2.2

Status: Non-conformity No. 2018.03 with minor raised to Major Category.

2.3

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

2.3.1, 2.3.2, 2.3.3 & 2.3.4

The company has procedure of land conflict management No.4 (revise 2) dated 2 January 2015, explain that problem solving of conflict area is conducted by negotiation which involves leader of dispute area and determine the compensation done by negotiation until they reach agreement. Calculations of compensation carried out with reasonable prices in accordance with the taxable value and state of the areas. In procedure does not distinguish how to calculate compensation based on gender, transmigrator, local community or ethnic group.

Berangir Unit has managed since 1974, which previously was owned by PT Wongso Rubber Coy, a rubber plantation company. The land acquisition processed by previous owner, began with land acquisition from communities area by providing compensation in 1977, continued by Berangir Unit and finished in 2005. Based on the interview with Communities (Sei Raja Village and Simpang Merbau Village) and previous land owner are known that there are no indigenous rights or customary rights and there is no issues regarding to FPIC process. The compensation process are done directed to the land owner and not diminish the legal/customary right, landowners are given the freedom to release their land without coercion.

Status: Comply

PRINCIPLE #3 Commitment to long-term economic and financial viability
3.1

There is an implemented management plan that aims to achieve long term economic and financial viability.

3.1.1

The company has documents on the long-term plan contained in the *Rencana Jangka Panjang* PT Perkebunan Nusantara IV Unit Berangir period 2020 - 2024 that explain about business plan and operational management which includes: area statement, projections for production, CPO, PK, Revenue CPO and PK, cost estates, mill costs, profit and loss, and net profit and loss. Annual planning also evaluated at the end of year and compared with realization. It annual planning can be adjusted based on field condition, financial condition or another reason. Based on information from representative management (estate manager), the long-term plan has been planned well with top management (company directors) and sufficient or feasible as a management plan for achieving the long term economic and financial.

3.1.2

Until now, PT Perkebunan Nusantara IV Berangir Estate does not have a detailed replanting plan because the oldest planting year was in 2000 (19 year old plant). Plans for replanting will be carried out after the age of the plant enters 1 cycle of oil palm plants (the fastest is done in 2025).

Status: Comply

PRINCIPLE #4 Use of appropriate best practices by growers and millers
4.1

Operating procedures are appropriately documented and consistently implemented and monitored.

4.1.1

The company has had procedures related to agronomy and processing. The agronomy procedures consist of nursery, land preparation, planting, planting legume cover crop, manual upkeep and chemical upkeep, soil and water conservation, manuring, pest and disease control, harvesting and FFB transportation. Procedures related to processing consist of FFB receiving, processing stations, to dispatch, laboratory and maintenance, as well as waster management. These procedures have been relevant and have covered all the operational aspects of existing plantations and factories. That SOP's is available on audit site (Estate and Mill office) and written in a language that is easily understandable for workers (written in Bahasa). The entire procedure both of plantation and

mill has been included of safe working instruction, other than those described in the HIRAC document.

Interviews were conducted to harvesters, pesticides applicators, and manuring workers in Berangir Estate and also operators in Berangir Mill. Based on the results of interviews can be concluded that the workers understand the duties and responsibilities of their work in accordance with the applicable SOP.

4.1.2 and 4.1.3

The company has conducted annually internal monitoring to ensure implementation of procedures. The monitoring conducted through annually operational internal audit by internal audit department and RSPO internal audit by sustainability department. The records of internal audit on 2018 has been documented. Non compliance records of internal audit has been corrected and verified by management. Each unit has documented the operations of the estate and mill production such as daily reports, supervisor workbooks, etc. The field visit at the mill shows that the unit has been documenting the daily activities in a daily production report that documented by using computerized systems.

4.1.4

Berangir POM does not received FFB from third parties. The FFB's are supplied from Berangir Estate and other estates under the management of PTPN IV, such as:

- Meranti Paham Estate
- Ajamu Estate
- Panai Jaya Estate

	Status: Comply	
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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 and 4.2.2

The company has procedure related to maintain soil fertility (No. Unit Usaha A.10 June 2013). The procedure regulates the basic of fertilization, soil and leaf analysis activities, organic and inorganic fertilization, and fertilization management. During the audit, there is no manuring activity related to stock of fertilizer not yet available in the warehouse. However based on document review, implementation of manuring activity has been well documented in book of manuring program. It shows that the dose, amount, and location has been in accordance with the recommendation.

The auditor conducted an interview with the fertilizer workers at Division 4 Berangir Estate. Fertilization is done manually by workers. Workers can also explain the fertilization procedure well, which is in accordance with the dosage determined based on the recommendations.

4.2.3

The company has routinely monitored the changes on the nutrient status based on the regular soil sampling unit (SSU) and leaf sampling unit analysis (LSU) to determine fertilizers recommendation. The sampling spot has been determined in each division and block routinely by *Pusat Penelitian Kelapa Sawit (PPKS)* and it is supported by well-trained census officer in each division. SSU is conducted every 5 year, meanwhile LSU is conducted annually. The last LSU result was issued on December 2018 and the last SSU result was issued on 2017. Visual observations performed every year at the time of leaf analysis activities. Visual observation is a consideration in determining the fertilizer recommendations, deficiency of nutrients and analyze the potential of disease which is likely to become endemic of a particular disease.

Result of soil and leaf analysis published recommendation on fertilizer doses to produce an optimal production of palm fruit. Principles of fertilization are giving treatment on the ground to produce the nutrients required by palm and generating optimal results.

4.2.4

The company has a strategy of recycling nutrients, such as the use of the frond (pruning), application of effluent and EFB Mulching. It shows a recording of the EFB applications realization until May 2019 on Berangir Estate. Overall, the company has made efforts to maintain and improve soil fertility. Visually, there is no symptom of nutrient deficiency at the blocks that have been visited.

Status: Comply
4.3
Practices minimize and control erosion and degradation of soils.
4.3.1 and 4.3.6

The company has Soil Map and Slope Map in the HCV document. Based on the map, soil type in the operational area of Berangir Estate is Inceptisol and Ultisol. The soil fertility of Inceptisol is generally better than Ultisol. However, because the soil has shallow or flooded groundwater levels, this soil is classified as marginal with special treatment to be suitable for oil palm, while Ultisol is still suitable for oil palm. There was no peat soil in the operational area. There was no fragile or problematic soils such as sandy soil or soil with low organic matter content.

Auditor conducted field observations in the EFB application and POME application area and it can be concluded that the company has implemented a management strategy to optimize the potential of the land with the limiting factor.

4.3.2

The company has Slope Map of the PT Perkebunan Nusantara IV Berangir Estate, scale 1: 32,000 with topography legend. Based on the map, the topography area in the Berangir Estate is 0% - 8% (flat), 8% - 15% (ramps), 15% - 25% (undulating), and 25% - 40% (rather steep). The dominant topography (about 80%) is 0% - 8% (flat). There are sporadic areas with topography of 25% - 40% (rather steep) in Afdeling III, Afdeling IV, and Afdeling V.

Based on SPO No. 01.4 Land Preparation and Preservation, the company has management strategies for planting in certain slope areas, such as:

- Making terraces, silt fit, and castles. In area with a slope of 20% - 40% is made individual terrace for 1 plant.
- At slope > 40° is not cleared land, tree felling, and planting.
- Terrace monitoring is done regularly to repair the damaged.
- Making drainage ditch in lowland, flat or flooded areas.
- In certain areas, i.e flat area or lowland below the road, it is made a long ditch.
- On a declining roadside, before arriving at the bridge, the drain must be drained sideways to allow water to flow into the river and not damage the foundations of the bridge.

Based on the field observation and explanation of assistant on the rather steep area (replanting 2006) at Division IV, the management of the area such as making of contour terrace and putting fronds at the edge of terrace, conserving mixed weeds on the terrace wall (no spraying), and constructing drainage ditch in the lower area.

4.3.3

The company shows a road maintenance program for 2019 period. Berangir Estate have classified roads based on their conditions (good, medium and heavy). From these data the company made priority programs in road improvement. For example, the realization of road improvements in Berangir Estate has reached 6,150 meters on May 2019. Based on field observations throughout the audit activities, it was concluded that the road conditions on Berangir Estate were in good condition and could be passed.

4.3.4 and 4.3.5

According to semi detail soil survey report, there is no peat indicated in all company operational area. Hence, no peat management that planned.

Status: Comply
4.4
Practices maintain the quality and availability of surface and ground water.
4.4.1 and 4.4.2

The company's plan for water management in mill and estate can be seen from:

- HCV Management and Monitoring Plan semester II 2017 for HCV 4.1 (Areas or Ecosystems that are Important as Water Providers and Flood Control for Communities in the downstream of the river)
- Program of monitoring and management of water resources Berangir Business Unit
- Environmental Monitoring Plan

- Water budget for palm oil processing is set at 1.5 m³/ton FFB.

There is a River Border Management Mechanism with No.SPO 05 revision 02 effective date 02 January 2015. In the procedure it explains the setting of border area as protection forest. procedures include explaining the setting of border areas as protected forests. The procedure also explains the management of border areas, among others, by:

- Boundary Mark
- warning / banning signs disrupt the riparian
- Socialization to the community and other stakeholders about conservation areas

Based on field observation to Block 01Z known the riparian condition of Titi Timbang river was uninterrupted condition. There are no traces of chemical applications such as fertilization and spraying of pesticides in the area. 5 palm tree from the riparian are marked red as a spray boundary.

4.4.3

The process of waste management is done by making WWTP (Waste Water Treatment Plant). The Company has a license to utilize waste water of palm oil on the land in accordance with The decision of the Regent of North Labuhanbatu Nomor : 660/68/DLH/2017. The decree is valid for five years since it was enacted in 2017. In the permit, the application area is 97 ha and control area of 2 ha. Wastewater test results from January 2018 to March 2019 show BOD value and pH not exceeding quality standard. For example in March 2019 the measured BOD is 308 while the quality standard of BOD is 5,000 mg/litre.

the company is in the process of repairing the Land Application area and replacing the POME pipeline to the Land APikasi area. until a new ASA-1 audit is carried out a 30 Ha longbad repair / dredging of a total of 97 Ha of the Land Application area. Results Field visits to the Land Application area in the 00H and) blocks) j know that the improved land area of the application is in good condition. The improvement process was a concern, the company had the opportunity to complete the process of repairing the land application area to completion of OFI

4.4.4

The Management Unit has Basic Working Guidance No. Doc. Business Unit.C.11, June 2013. At point 7 it is described the Water Treatment Plant, as follows:

- Water derived from reservoirs in Raw Water Tank (RWT)
- Water is accommodated in RWT then be flowed to Clarifier Tank for the settling process (chemical injection).
- The precipitated water is filtered (sand filter)
- After going through the screening process, the water is used for boilers and domestic consumption

In 2018 Berangir Mill processed 113,937 tons of FFB and used 278,867 m³ of water for processing or an average of 2.44 m³ per ton of FFB. The average ratio still exceeds the established ratio. On 14 March 2018, the Management Unit has conducted an evaluation to achieve the water use target 1.5 m³ per ton of FFB. A water use strategy has been developed in the processing of FFB signed by Chief Engineer. the proces stil runing until ASA-1.

Status: Comply

4.5

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

4.5.1

The activity budgeted on the program were consist of detection (global telling), census (effective telling) and monitoring of pests and diseases attack, biological control such as planting of beneficial plants. According to IPM activity records for 2018 until May 2019 such as program and realization of rat census, leaf eating caterpillar census, and ganoderma census, it could be concluded that all the census results were still under its economic threshold. There is no invasive species attack. This may lead to zero use of pesticides for pests and diseases control. It could be concluded that IPM techniques implemented by biological methods is effective to control pests and diseases, and also to minimize the use of chemicals. Furthermore, according to pesticides used record in 2018 until April 2019, agrochemical uses was only implemented for weeds control purposes. Based on field observation on harvesting, spraying and manual weeding activities, it was concluded that there were no significant pest attacks. This is in accordance with the result of the census.

4.5.2

The company has records of the training implementation for workers who are involved in the implementation of integrated pest management, for example, Integrated Pest Management training on 8 April 2019 with the number of participants are 18 employees consisting of census operators, supervisors, and field assistants. Based on interview with the worker revealed that the worker understand the method of plant pest and diseases census or detection.

Status: Comply

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

The company has SOP and work instruction on weeds management, the guidance covering about chosen, storage, application, contaminated handling, known about signs and symptoms of pesticides poison and first aid for poison case. To ensure pesticide used are in accordance with the target, company conducted identification the type of weed found in operational area. Based on field visits and interviews with 3 pesticide applicators in division 2 Berangir Estate, it was concluded that workers knew about the function of the chemical used and selective when doing the spraying activity, as for example for glyphosate material used to spray the circle and harvesting path only while the weeds in inter row not sprayed. The company used *Isopropil amina glyphosate* and *Metil metsulfuron* which have received permission from the government. Based on document verification and observation to pesticide storage, there is no prohibited chemicals use.

4.6.2

The company has documented records of pesticide toxicity in the document of Monthly Pesticide Toxicity Data. The document is recorded product name, active ingredients, LD₅₀, area treated, amount of active ingredients applied per Ha, and total application. This document is constantly recorded and updated by Estate Sustainability Officer each month.

4.6.3

Berangir Estate has program to reduce the pesticide usage by replacing pesticides with biological controls such as using natural predators to control rat and planting the beneficial plant. Based on document review and field observation, several IPM program with biological approach that has been implemented such as rat control by *Tyto alba*, and leaf eater caterpillar by planting beneficial plant such as *Turnera subulata* and *Casia cobanensis*. Moreover, it has also conducted early detection routinely listed in the monthly report of early warning system. There is no prophylactic use. In 2018 until May 2019, the company does not use pesticide for pest control at all.

4.6.4

The Management Unit has the complete list of pesticides belonging to the WHO Class 1A or Class1B, or those listed in the Stockholm or Rotterdam Conventions and paraquat and also has Internal Circular Letter of the Unit Manager No.BER/SE/Intern/IA/1/2018, dated 08 January 2018, regarding Paraquat Reduction Program. Berangir Estate will implement the paraquat reduction program in controlling weed by prioritizing manual control and pest control by emphasizing biological control. Based on document verification and field visit to pesticide storage, there is no paraquat and WHO Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions application from May 2018 until April 2019.

4.6.5, 4.6.7 and 4.6.9

The results of field observation in warehouse and interview with pesticide applicator in Division 2 Berangir Estate, it is known that the employees have been given regular training in safe work practices. This was evidenced by the employee can demonstrate the correct way to work in accordance with the procedures including how use and handling the risks in accordance with material safety sheets. There have been sheets of safety work (MSDS) and the symbols of hazardous and toxic materials are properly installed on the walls and doors of warehouse.

The pesticide applicator also using personal protective equipment in accordance with specified hazard identification and material safety data sheet such as respirator mask, gloves, safety shoes, apron and googles. In addition, employees are also informed about the steps of secure work in each roll call in the morning before work. Meanwhile, the spraying workers interviewed also claimed that after spraying they will be washing up and drying up the PPE and spraying tools (sprayer tank, jerry, etc), and taking shower/changing clothes in special place near pesticide store of the division office. Therefore, based on field observation to mixing area in Berangir

Estate, that known there are storage for keeping all PPE's and spraying tools after use.

4.6.6

The Management Unit has had SOP for Hazardous and Toxic Waste Management (B3) No. SPO 02 dated 02 January 2017 (Revision 03). In point V - Description of Procedure it is explained about temporary storage, waste identification, data collection of waste, packaging of chemical ex-container, waste placement, shelf life, and delivery of waste to the licensed carrier company. The Management Unit also has Procedure for Washing of Chemical Spraying Equipment.

The Management Unit has performed pesticide storage in accordance with best practices. For example, field observation in Pesticide Warehouse at Berangir Mill Complex – herbicides (Elang, Metsulindo, and Santafuron) have been stored by type and equipped with MSDS in a special room. The warehouse is well ventilated, also available eye shower and hand washing, safety symbols and required PPE symbols, sands to absorb pesticides in case of spilled and be collected again as hazardous waste.

Based on field visit, for instance in Afdeling II and III , there was no pesticide ex-container discarded in the field. The pesticide ex-container has been stored at Temporary Hazardous Waste warehouse. Based on the Hazardous Waste Manifest, the last transportation

4.6.8

Based on a review of documents and interviews with management staff, the company did not perform the application of pesticides from the air.

4.6.10

The Management Unit has had SOP for Hazardous and Toxic Waste Management (B3) No. SPO 02 dated 02 January 2017 (Revision 03). In point V - Description of Procedure, it is explained about temporary storage, waste identification, data collection of waste, packaging of chemical ex-containers, waste placement, shelf life, and delivery of waste to licensed carrier company. Technical handling of ex-agrochemical container has been described in the Training of Pesticide Handlers held on 25 January 2019 attended by 16 participant.

Field observations of Washing House in Afdeling III, it is equipped with a water faucet, 2 separated shower rooms (for men and women workers), rinse water is stored in a control tub, washing tub for PPE and spraying equipment. The PPE (apron) storage is available, while other PPE (masker, boots, uniforms), and spraying equipment are stored in general warehouse. Assistant of Afdeling II explained, that rinse water collected in a reservoir will be reused for the next herbicide mixing.

Based on the interviews with spraying team at Block 05E, Division II Berangir Plantation, all former pesticide ex-containers were returned to the warehouse, washed, and then be stored in the warehouse before being transported to hazardous waste temporary storage for later be given to the licensed carrier company.

4.6.11

Berangir Estate has list of pesticide operator based on latest data of May 2019 as many as 30 workers. Medical examination (cholinesterase) has been conducted on 13 December 2018 to all pesticides workers in Berangir Estate. The result of medical examination is informed to the workers and all pesticide operators are in a healthy condition (normal result). And also, based on interview with the workers, it is known that they are never get experience of occupational injury which caused by chemical such as irritation.

4.6.12

The company has a policy that prohibits pregnant and breast-feeding personnel working with chemical material. Based on interview with spraying personnel, it is known that there was neither pregnant nor breast-feeding female personnel who work with pesticide. Audit team also got information that the personnel have understood that female personnel cannot work with chemical material if they are pregnant or breast-feeding.

Status: Comply

4.7

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

4.7.1

The company has a policy of occupational safety and health were written in Bahasa. The policy has been legalized and updated on 2 January 2015 by Unit Manager. This policy is designed to control hazards in every activity that is in the working environment to prevent accidents and occupational diseases. Management have work program of occupational health safety every year. Realization of the program of work will be monitored through regular meetings Guiding Committee of Occupational Safety & Health every month. This work program applies generally to all workers in the workplace. If the plans have been made yet on target then will be evaluated in the management review to assess effectiveness.

Interviews were conducted to estate workers (harvester and pesticides applicator) and mill workers (boiler operator, engine room operator, kernel operator, etc). Based on the results of interviews can be concluded that workers understand the OHS policy and it's recognized that every morning meeting is always affirmed about the importance of safety and the use of PPE in work.

4.7.2

The company shown the document of hazard identification, risk assessment and risk control which issued on January 2019. It will be reviewed if any occupational accident happen. The document describes the description/activity, potential hazards, risk assessment and risk control. Based on site observation at workshop in Berangir Mill and agrochemical warehouse in Berangir Estate, it was clearly confirmed that workers had been aware related potential risk and hazards in the work place. Following up on this, the company has been reduce the potential risk by routine socialization about OHS, providing PPE, and OHS signboard are available in workplace.

4.7.3

Based on documents verification and interviews, it is known that all operators at Berangir Mill and Berangir Estate already have lisenese such as boiler operators, lift carrier operators, welders and electrical technician. The management unit has had the training plan for workers exposed to high noise levels such as training of procedure, socialization of HIRAC and safety briefing before work.

The company has a PPE Replacement Mechanism in the Circular Letter (No: BER/SE/Intern/24/II/2019), which explains when found damaged PPE, the administrative officer made the damage PPE reports and made a report on the request for new PPE replacement. Based on field observations and interviews with workers at the Berangir Mill and Berangir Estate, the facts of the field were found as follows: 1 worker at the kernel station, 1 worker at the engine room station, 1 worker at the chemical warehouse, 1 worker at the temporary storage of hazardous and toxic materials, 1 worker at the water treatment plant, 2 harvesters at the division I, 1 harvester at the division IV, 2 pesticide applicators at the division II and 3 manual weeding workers at the division IV using PPE shoes that do not meet company standards (purchased by the workers themselves because the shoes that provided by the company are damaged before the new replacement period). Based on these evidences, the company has not been able to demonstrate the implementation of PPE management according to the procedure owned. This becomes a **Non-conformity No. 2019.01** with **MAJOR category**.

4.7.4

The company already has persons that responsible for the OHS program within the organizational structure of Committee of Occupational Health and Safety (P2K3) established in each management unit. The organization routinely conducts monthly meetings on OHS issues in the workplace. The documentation of the meeting were recorded and stored well. Based on interviews to workers who are members of the P2K3 organization it is known that monthly meetings are always routinely conducted to discuss about OHS such as consistency of PPE usage, work accident report, fire simulation, checking of emergency response equipment, OHS sign board, cleanliness of work area, etc.

4.7.5

Procedures for accidents and emergencies are contained in SOP for Handling of Accident and Health Check date effective 23 April 2013 and SOP for Emergencies Handling (No.Document 4.3.16 revision 02 dated 23 April 2013). The procedures cover the main potential causes of emergencies such as fires, chemical spills, etc. The procedures also explained that records of all accidents shall be kept and periodically reviewed. Simulation was performed to know the preparedness of emergency response equipment in the POM. The simulation was performed on hydrants located in the mill and the result of the experiment was concluded that the hydrant tool is ready for use.

Berangir Mill and Berangir Estate has already licensed first aid officers and there was first aid internal training conducted on 5 November 2018 which was attended by 17 participants. Based on field visits and interviews, it was found that all the supervisor in

each of activities were equipped with first aid kit and had been trained on the use of first aid boxes and the supervisor explained the usefulness of each first aid kit.

This indicator has been a minor non-conformity in the previous audit, and based on verification on this ASA-1 and the evidence of correction shown then it was concluded that at the time of this ASA-1, the non-conformity had been closed.

4.7.6

The company has provide medical care for worker including contract and permanent worker. Medical care is covered by worker and health insurance (*BPJS*). The payment for *BPJS* is conducted every month according to the available rule. Besides, the company also provide medical facilities for workers if work accident is occurred. Work accident will be reported to the *BPJS* Agency and claim for it will be done if the medical process has been completed. Based on interview with worker in estate and mill, it is known that both worker and their family is have been registered in health insurance (*BPJS Kesehatan*). There are some contractors in certification unit. Based on interview with contractor representative, it is known that the accident insurance for contractor's workers is covered by the head of contractor itself.

4.7.7

The company has calculated the Lost Time Accident every month for monitoring the recording of occupational accidents. It shown the Lost Time Accident calculation per May 2019. This document informs the number of worker, number of working days, the number of non effective working days, overtime, hours of work in total, the number of accidents, the number of working days lost, hours of work a year, the number of accidents a year, lost days a year. Calculation of SR and FR is reviewed regularly and will be evaluated at monthly meeting of OHS Committee.

This indicator has been a minor non-conformity in the previous audit, and based on verification on this ASA-1 and the evidence of correction shown then it was concluded that at the time of this ASA-1, the non-conformity had been closed.

4.7.3

Status: Non-conformity No. 2019.01 with MAJOR category.

4.8

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

4.8.1

The company has conducted training need analysis for period 2019 for several fields and participants who will be included in the training. For example training is related to document administration, extension of operator licenses, training related to best management practices, and so on. For training on health and the risk of pesticide exposure, and emergency response is carried out regularly every month.

Based on interview with worker in estate and mill, they have received some training related to their work, such as work procedure training, emergency response, and first aid training. The training has been documented into minutes of meeting, list of attendees, and photo activity. Company also has conducted training regarding awareness of RSPO P & C to the workers.

4.8.2

Company has showed the documentation of training or socialization whether it is internal or external training in form of minutes of meeting, list of attendees, and photo activity. Company also kept training record for each worker. For example:

- Training for chemical handling on 8 April 2019 attended by 9 worker in Afdeling 2
- Training for restricted pesticides usage attended by 6 participants

Based on interview with contractor, training to contractor worker is conducted by socialized the OSH policy or environment management every month by the supervisor.

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

The Berangir business unit has environmental documents in the form of RKL-RPL Estate and Palm Oil Mill. Dated January 24th, 2005 endorsed by Head of Bapedalda of North Sumatra Province with Decree No. 137/BPDL.SU/BTL/2005. Scope of nalysis was oil palm plantation covers 4,775 ha and oil palm mill with production capacity 40 ton FFB/hour. There are reporting guidelines: Head of Bapedal Decree No.105 of 1997 on monitoring guidelines RKL-RPL with an area of 4,593.57 ha located in Sei Raja Village, District NA IX-X North Labuhanbatu District of North Sumatra Province.

The company has environmental permits from the Investment and Integrated One-Stop Licensing Service, North Labuhanbatu Regency with No: 503/05 / DPM-PPTSP / II / 2019 dated 27 February 2019 for gardens and factories with an area of approximately 4,775 Ha.

5.1.2 and 5.1.3

The workplace environmental management plan is contained in the RKL-RPL document. In the letter of endorsement listed company's obligation to create new environmental management documents if there are design changes, and/or processes, and/or capacity and/or materials and/or auxiliary materials. When the initial assessment is carried out there has not been any design change or capacity.

The environmental impacts that are monitored and managed by the company, such as environmental management (Hazardous and Toxic Substances, hazardous waste), Social Economy, Culture and Public Health (Occupation of employment and business opportunity, improvement of public income, utilization of public and social facilities, public health, security and order), management and monitoring of air quality, management and monitoring of noise intensity, water body receiver and groundwater

RKL/RPL has delivered to several Agencies such as Environment Agency, Industry Agency, Agriculture Agency, Plantation Agency, Health Agency, etc. to be reviewed, on April 2019.

Company management was able to show several monitoring results, for example as follows:

- Monitoring of noise intensity on Infront of Mill Office, Processing Stations and Mess were about 55.1 dB, 83.1 dB and 55 dB, respectively. Those figures were still under threshold limit.
- Monitoring of air quality in Boiler No. 1 for SO₂ and NO₂ were w mg/m³ and 123mg/m³, respectively. Those figures has also bellow the threshold limit.
- Water quality parameters of Berangir River in the upstream and downstram such as pH, BOD, Nitrate, Sulfate and Pd were still remain no significantly change. For example pH in upstream and downstream of Berangir River were 7.26 and 7.36, respectively.

Based explanation above, it could be concluded that all environmental parameters tested were still under threshold limits as required by Indonesian regulations

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

There are documents of identification of high conservation value areas conducted by PT Surveyor Indonesia in 2011. Responsible management of HCV: Selamat Riadi and Khairul Sahri, both have attended training identification management and monitoring of high conservation value area held by Kompasias Consultant on 12 - 14 September 2012.

Scope identification is PTPN IV berangir estate with area 4,648.70 ha. The total area of HCV Berangir Estate is 208.64 Ha. The HCV Assessor is chaired by Dr. Kunkun Jaka Gurmaya with members Risman, Henry Marpaung, Yusuf, Masrizal, and Teguh Atuayanuar Zaelani. The HCV report has been reviewed by Rudi Lamuru (RSPO Registered HCV Assessor).

5.2.2

Identification of HCV and RTE is contained in the HCV assessment document made by the Indonesian Surveyor Team in 2011. The document identifies HCVs that are within the operational area of the Berangir Business Unit and identifies existing RTE species. In addition, there are also management recommendations related to the presence of HCV and RTE.

The company designates HCV management plans for the second semester of 2018 and the first semester of 2019, among others.

- Periodic installation of HCV signboards
- Preserve the types of grass, shrubs and woody trees
- Socialization to the community.
- Soil and water conservation (manual and technical)

Based on the results of field visits to HCV springs in block 05H known that spring conditions are maintained, there is a management radius of 50m. in addition, based on the results of field visits to the HCV area, the Titi Gambang River, block 01Z, was known that the river border area was maintained, no chemist activity was found. There has been a sign board ban and a spray limit in the form of paint on the palm oil.

5.2.3

Policies to protect RTE species are mentioned in circular number: BER / SE / Intrn / 05 / I / 2018 dated January 02, 2018 on Prohibition and Sanction of Capturing, Harming, Collecting, or Killing Animal Including the category of RTE (Rare Threaten Endangered). Routine socialization and reporting related to HCV and RTE have been implemented. Based on the results of interviews with spray workers, harvests, and employees afdeling 3 Berangir estate known socialization about the prohibition of hunting and maintaining animals that are protected regularly has been delivered. Socialization of HCV is also routinely performed. HCV areas are marked as protected areas. Furthermore, based on observation to Afdeling 3 housing area, it was known that there were no workers collecting RTE species.

5.2.4

One form of the company's commitment to protect HCVs and RTEs is to conduct routine socialization and sign board installation as well as warnings about HCV and RTE. The company also conducts regular reporting regarding the existence of these rare flora and fauna to the Department of Environment of North Labuhanbatu Regency. The company has a Monitoring plan for the second semester of 2018 and the first semester of 2019 including.

- Monitoring the diversity of flora and fauna species
- Intensity of interference with river boundaries and springs from fire hazards
- Change in river width and river water quality
- Signboard condition
- Landslide and erosion monitoring
- Monitoring the success rate of river border rehabilitation programs
- Monitoring the presence of HCV

Montitoring, that has been done for 2018 in the form of a sign board condition and monitoring trees in the river border area, whereas plans for other monitoring have not been carried out. While for the 2019 monitoring document, the company has not been able to show the realization of HCV monitoring. Based on the explanation above, the Company has not been able to show evidence that the entire HCV monitoring plan has been carried out. **Nononfirmity 2019.02 with minor Category**

5.2.5

In the company's operational areas there is no HCV area in conflict with the rights of local communities.

5.2.4

Status: Non-conformity No. 2019.02 with minor category.

5.3

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

5.3.1

PTPN 4 Unit Berangir has RKL-RPL documents, SOP of Hazardous Waste Management, and GHG emission. In the document there is the identification of waste including Hazardous and Toxic Materials (Estate and Mill) also the Waste of Estate and Mill PTPN 4 Berangir Business Unit. The Company identifies sources and waste products for all activities located in the company's operational area.

5.3.2

Inventory of chemical containers contained in hazardous and toxic waste management procedures No.SPO 02 effective date January 02, 2017 revision 03. The procedure states that any Hazardous and Toxic waste may not be intended for other purposes and must be submitted directly to the licensed Temporary Hazardous waste storage. However, based on field observations found among others:

Pesticide Used Packaging

- The latest shipment of waste waste to 3rd party licensed by the company on August 28, 2018.
- Documents for the use of Pesticides in 2019 until May, there were known uses of pesticides such as Santafuron as much as 35.88 Kg, Metsulindo as much as 40.02 kg, and Elang (Glyphosate) as many as 2,995.6 ltr.
- However, based on a study of 2019 logbook hazardous waste documents up to June, there was no record of used pesticide packaging that entered the hazardous waste warehouse and based on field observations to the hazardous waste warehouse, Central Pesticide Warehouse and Afdeling Pesticide Warehouse, no pesticide packaging was found.

Medical Waste

- The results of interviews with doctors and paramedics in the clinic are known that until now no records have been made of medical waste produced.
- There is no evidence of handover of medical waste from the clinic to Pabatu Hospital (Medical Waste Destruction)
- Field observation in the clinic area, it is known that the medical waste storage area has not met the minimum storage standard. (placed in an open box).

Based on the explanation above, the Company has not been able to show evidence that all chemical waste and its containers have been disposed of responsibly. **Non-confirmity No 2019.03 with Major Category**

5.3.3

The Company has implemented Hazardous and Toxic Materials waste management activities. In the SOP of Hazardous and Toxic Materials waste management it is explained that all identified Hazardous and Toxic Materials waste is collected to licensed Temporary Hazardous and Toxic Waste storage and submitted to licensed collectors. There is temporary storage permit Temporary Hazardous and Toxic Waste Storage in the form of Regent decree on temporary storage permit B3 waste PTPN IV Berangir valid since July 2017 to 3 years from the date of validity (up to July 2020).

The last transportation was carried out on August 28, 2018 by PT Jaguar Prima Nusantara with a vehicle with the number BP 9341 UY.

- WY 0002953 for 115 kg of used oil
- WY 0002954 for 10 kg used filters
- WY 0002953 for 42 kg of used batteries
- WY 0002956 for 17 kg of used lamps
- WY 0002950 for 1 kg used cartridge
- WY 0002948 for 120 kg of used jerry can
- WY 0002949 for used 6 kg Hard Sprayer
- WY 0002958 for Used Packaging as much as 31.6 kg
- WY 0002957 for 1.6 kg of used burlap

For other wastes such as EFB and POME, both were used for nutrient cycle purposes while for shell and fibres, both were used as energy source which substitute fuel consumption. Furthermore, the Company has conducted domestic waste management for each afdeling housing by providing temporary waste shelter. There is a special officer in charge of transporting garbage from residential area to landfill every one week.

5.3.2

Status: . Non-confirmity No 2019.03 with Major Category

5.4

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

5.4.1

Based on field observation at Berangir mill it is known that fiber and shell are used as fuel to reduce the use of fossil fuel. Total fiber usage in 2018 is 15,951.18 tons equal 0.14 tons/tonFFB while the used of shell is 6,836.22 tons equal 0.06 tons/tonFFB. The use of fibers and shells as boiler fuel is recorded and monitored by officers. The evaluation is carried out by the company by looking at the comparison of the use of renewable fuels from year to year with the target always increasing from year to year.

The use of electricity in the processing of FFB from January to December 2018 averaged 0.14 kwh/ton FFB. When conducted ASA-1 audit, mill waste water is utilized on land through land application system, so there is no plan of biogas plant activity.

Status: Comply

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

5.5.1 and 5.5.2

Policy of zero burning was presented in procedure of land clearing and replanting No. SPO.02 dated August 1st 2007 about new planting. The procedure mentioned that replanting was conducted through zero burning method, as could be seen on Work Agreement document with Contractor PT Bersama Abadi Jaya, which mentioned that burning activity during replanting was strictly prohibited. Furthermore, based on interview with Agriculture Agency and Environment Agency of Labuhanbatu Utara District, as well as interview with representatives from Sei Raja and Pasang Lela Village, it was informed that burning activities was never been carried out by PTPN IV Berangir Unit. Furthermore, based on observation to Berangir Estate field, it was known that there were no sign of burning activities by estate management. Hence, it could be concluded that PTPN IV Berangir Unit has only adopt zero burning method for land clearing purposes and in accordance with Guidelines for the Implementation of the ASEAN Policy on Zero Burning 2003.

Status: Comply

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

5.6.1, 5.6.2

CH has identified sources of pollution and emissions generated from all operational activities of the plantation and factory. The company also has plans to reduce or minimize these emissions. This is contained in the Mitigation document and efforts to reduce GHG emissions, such as:

- Providing appropriate training to spraying team
- Planting beneficial plants (cassia cobanensis, tunera spp and antigonon spp) in empty areas.
- EFB application
- Perform routine services on vehicles and generators
- Plant trees around generator houses and riparian belt areas.
- Perform leaf analysis to determine the type and dosage of fertilizer
- Land monitoring that has the potential to be fire-prone

CH has also conducted an assessment of activities that cause pollution or emissions, for example:

- Liquid Waste quality testing
- Air quality testing
- Testing of emissions of boilers and generators
- Noise testing
- Odor testing
- Vibration testing

Based on the results of a field visit in the factory area, known that warning signs are posted at high noise areas.

5.6.3

The CH already monitored and reported the significant emissions and pollutions annually using RSPO palmGHG calculator, for period 2018 describes as follow (calculator ver 3.0.1):

Summary of Net GHG Emissions

Emmision per product	tCO2e/tProduct
CPO	0.51
PK	0.51
Production	t/yr
FFB processed	106376.2
CPO produced	25248.43
PK produced	4984.18
Extraction	%
OER	23.74
KER	4.69
Land use	Ha
Planted area	4015.26
Planted on peat	0
Conservation Area	206.74

Summary of field emission and Sinks						
Descripton	Own crop		Group		3 rd party	
Emissions Sources	tCO2e	tCO2e/tFFB	tCO2e	tCO2e/tFFB	tCO2e	tCO2e/tFFB
Land conversion	39657.23	0.37				
CO2 emmisions from fertilizer	3003.49	0.03				
NO2 emissions	2663.95	0.03				
Fuel comsumption	234.11	0				
Peat oxidation	0	0				
Sinks						
Crop sequestration	-37589.79	-0.35				
Sequestration in Conservation area	0	0				
Total	7968.99	0.07				

Summary Oil Mill Emissions and Credits		
Remarks	tCO2e	tCO2e/t FFB
Emissions sources		
POME	7333.4	0.07
Fuel consumption	242.74	0
Grid electricity	0	0
Credits		
Export of grid electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	7576.14	0.07

Palm Oil Mill Effluent (POME) Treatment	
Divert to compost (%)	0
Divert to anaerobic digestion (%)	100

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

CH has conducted GHG emission calculations period 2018 Using Calculator Palm GHG version 3.0.1. Accurate data has been put into the RSPO PalmGHG Calculator (Palm GHG version 3.0.1) and has been verified. Summary of net GHG emissions from PalmGHG calculator of the audit report which calculation option is applied Apply Full Version.

Status: Comply

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

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

6.1.1, 6.1.2, 6.1.5

Social impact assessment was conducted in July 2011 in collaboration with PT Surveyor Indonesia involving local communities. Social assessments include impacts on the socio-economic aspects, social aspects (education, health), socio-cultural aspects, customs and traditions..

The assessment was conducted by interview involving stakeholders, such as sub district head of Sungai Raja, Berangir, Pasang Lela, and Silumajang Village. After conducting interviews with affected parties, the company conducted public consultations with stakeholders and employees. The public consultation delivered the results of the interviews and was given a question and answer session for stakeholders. Company showed photo documentation of interview and minute of meeting of public consultation. Based on interview with representative of Sungai Raja and Simpang Merbau village, all issues is covered in SIA document. However, company does not conduct any partnership with smallholder.

6.1.3, 6.1.4

Company has arrange management and monitoring plan for social impact assessment every year. Management and monitoring plan is made by involving the stakeholder such as Sungai Raja, Berangir, and Pasang Lela Village conducted on 23 May 2019. Monitoring is based on management plan and the monitoring result also make the new management plan. The latest management and monitoring plan is for period of 2019. Management plan for 2019 is same as previous year because those communities still need those management plan. For example:

Social Impact	Management Plan	PIC	Execution Time
Social and public facility	- Increasing communication with community to discuss village development program	Human resource assistant	During operational activity of Berangir.
Job opportunity	- Socialized the job vacancy to surrounded village	Human resource assistant	During operational activity of Berangir.
Business opportunities and education improvement	- Helping the surrounding village community to be able to develop the educational and business potential that exists in the village - Creating a business program for the surrounding community	Human resource assistant	During operational activity of Berangir.
Conflict with farmers	- Establishing mutually beneficial relationships between plantations and farmers	Human resource assistant	During operational activity of Berangir.

Management and monitoring plan has reviewed every 2 years. The latest review of social management and monitoring plan is on 8 January 2018. Based on interview with representative of Sungai Raja and Simpang Merbau Village, all social impact has been identified in SIA document. However, they felt that they had never been involved in a management plan review. Responding to this, the company showed attendance lists carried out during the preparation of management plans, attended by Sungai Raja Representative on 23 May 2019. Company need to improve providing understanding and involving communities related to social

impacts management (OFI).

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

Mechanism for consultation is listed in procedure of *Komunikasi dan Konsultasi dengan Masyarakat* (SPO No. 3) dated 2 January 2017. The procedure explain that all communication and consultation managed by human resource assistants representing the manager. All communication must be submitted to the manager to be processed and will be informed to the public and follow-up that will be carried out by the company no later than 3 months after the information is received. Procedure is available in Bahasa Indonesia

Based on interview with Statutory Bodies in Labuhan Batu Utara Regency and representative of Sungai Raja and Simpang Merbau Village, it is known that they understand how to communicate and consult with PTPN IV Berangir. They also know the PIC for communication and consultation.

6.2.2, 6.2.3

The PIC for consultation and communication with the community is HR assisstant. The PIC is assigned to accommodate the implementation of social impact analysis, responsible for top management for communication and consultation with stakeholders Officers

List of stakeholder is made by human resource assistant. The latest list of stakeholder is available for year of 2019, consist of statutory bodies (National, Province, Regency, Sub-District), local communities, worker organization, youth organization. The company has documented incoming letters from external stakeholders in Recapitulation of Internal and External Communication. The document records the date of the letter, letter number, the sender of the letter, subject matter, and follow-up. The information request from stakeholders is about assistance proposal and mandatory reporting information. For example, A letter from Election Commission of the Labuhan Batu Utara Regency dated February 7, 2019 regarding a request to provide a place for data collection on special voter list for employees who have not been registered. The company then replied to the letter dated February 23, 2019 with the contents willing to provide a place and time.

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

Company has a mechanism of complaint and grievance handling, as follows:

- Procedure of *Komunikasi Internal dan Penanganan Keluhan Karyawan* (No. SPO 19) on 6 November 2018
- Procedure of *Penanganan Keluhan Pelanggan dan Lingkungan* (No. SPO 13) on 2 January 2015
- Procedure of *Komunikasi dan Konsultasi Dengan Masyarakat* (No. SPO 03) on 2 January 2017

The procedure is made involve the consideration from various parties. Company also will protect the identity of complainant. Based on interview with worker in estate and mill, it is known that workers understand how to deliver their complaint if any. Based on interview with representative of Sungai Raja and Simpang Merbau Village, it is known that they understand the mechanism to deliver their complaint if any.

6.3.2

Based on employee complaints monitoring data and interview with worker union, it was found that there were no complaints during 2018. In addition, based on interviews with company representatives and with surrounding villages, it was found that there were no complaints coming into the company.

Status: Comply

6.4

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

6.4.1, 6.4.2 & 6.4.3

The Company has compiled a procedure of Land Compensation describe in SOP No.4 (revise 2) dated 2 January 2015. The procedure is covered the process of identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation. The scope of procedure is all activities related to the compensation process for land over the land right cultivated by the Company, the purpose is to ensure the area of plantation free from others right. The procedure also determine the compensation done by negotiation until they reach agreement, calculations of compensation carried out with reasonable prices in accordance with the taxable value and state of the areas. In SOP does not distinguish how to calculate compensation based on gender, transmigrator, local community or ethnic group.

Berangir Unit has managed since 1974, which previously was owned by PT Wongso Rubber Coy, a rubber plantation company. The land acquisition processed by previous owner, began with land acquisition from communities area by providing compensation in 1977, continued by Berangir Unit and finished in 2005. Based on the interview with Communities (Sei Raja Village and Simpang Merbau Village) and previous land owner are known that there are no indigenous rights or customary rights and there is no issues regarding to FPIC process. The compensation process are done directed to the land owner and not diminish the legal/customary right, landowners are given the freedom to release their land without coercion.

Status: Comply

6.5

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

6.5.1

Company has a copy of Sumatera Utara Governor Decree No. 188.44/1365/KPTS/2018 about Minimum Wage of Sumatera Utara Province for 2019. The minimum wage for Sumatera Utara Province is Rp 2,303,403.43/month. Also copy of Sumatera Utara Governor Decree No. 188.44/575/KPTS about Minimum Wage of Sumatera Utara Province for 2018. It stated that minimum wage for 2018 is Rp 2,132,188.68.

Then, company issued decree No. 04.11/SE/10/IV/2019 30 April 2019 which explain that wage for worker consists of basic wage and special allowance for class IA – IVD. Company also has circular letter No 04.11/Kol/M-1063/V/2019 related to rice allowance for worker with class IA – IID. Company showed wage documentation for water pump operator for May 2019, he received basic wage Rp 1,843,407, special allowance Rp 303,937, and rice allowance Rp 425,000.

The company has circular letter No. 04.15 / SE / 07A / III / 2014 dated March 14, 2014 concerning the implementation of attendance incentives for class IA-IID employees of business units. The letter explained that the amount of attendance incentive that was given to each employee was in accordance with the average overtime carried out in the months before this letter was issued.

Based on the attendance list of water pump operator with employee code 04016577 IB / 13 in May 2019, the operator's actual working hours are 06.00 - 11.00 and 15.00 - 19.00 (9 hours / day). The employee works every day (25 working days + 6 holidays). Worker get attendance incentives as a substitute for overtime in the amount of Rp. 716,263 (considered 1 month overtime for 80 hours) according to the SE owned.

However, if calculated by calculating overtime, then the water machine operator who works every day in the example in May 2019 (25 working days + 6 days off) must get overtime pay of Rp 3,471,912. Based on the explanation above, it was concluded that the company had not paid wages for overtime in accordance with applicable regulations. This becomes **Non Conformity No 2019. 04.**

6.5.2

The Company has a Collective Labor Bargaining (PKB) for the period 2018-2020 between PT BBB and IPB3 and SPSI dated October 17th, 2018. The PKB was registered at the Manpower Agency of Muaro Jambi Regency No. 560.6/30/X/02/Nakertrans on October 17th, 2018, valid from October 17th 2018 - October 17th, 2020. Based on interview with some workers in mill and estate, it is known that they understand about PKB (collective labour bargaining). There is no change of workers policy. Based on interview with

harvesting workers, they are aware about deduction if the harvest unripe fruit.

Based on the document review of payroll documents (samples), the wages received by employees are in accordance with the applicable minimum wage provisions. However, based on interviews with several workers in the mill and estate, it was found that workers still lacked understanding related to wages, for example the component of wages earned. This is an observation related to workers' understanding of the terms of employment. **(OFI)**

6.5.3 & 6.5.4

Based on field visits to Afdeling III and V employee housing, it is known that:

- Bath wash toilet facilities (1 of 2 houses visited on Afd 3) in unfit conditions, namely there is no place for bathing and toilet doors in unfit conditions.
- Employees' toilets (2 of the 3 houses observed on Afd 5) are built by the employees themselves with inadequate conditions (broken doors)
- Water from the drainage is flooded to the road

Based on explanation above, the company has not been able to provide adequate housing facilities for workers. **Non conformity No. 2019. 05.**

However, adequate food supply can be accessed by the worker from nearest market and from worker cooperative. Moreover, there are some kiosk in housing complex. Personnel can get the staple food with reasonable price.

6.5.1
6.5.3

Status: Non Conformity No 2019. 04 with Major Category
Status: Non conformity No. 2019. 05 with Minor Category

6.6
The employer respects the right of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.

6.6.1 & 6.6.2

The policy related to form and join worker union is written in PKB which states that company admit SPBUN as worker association in all unit. The policy is written in Bahasa Indonesia. Based on interview with representative of worker union, it is informed that company is giving freedom for worker to express their opinion. And also, company did not give any intervention related to worker union activity as well as conflict of interest. Worker union has registered to Manpower Agency of Sumatera Utara Province with registration number 567/50/DSTKM/2001.

Based on interview with worker union, it is known that worker union routinely hold meetings with members (workers). The company shows examples of documentation of meetings between workers and worker union. For example, the meeting on 5 and 6 November 2018 about the socialization of gender equality policies on employment opportunities There are photos of activities and letters of invitation for the socialization activities. Documentation can be requested by employees if needed.

Status: Comply

6.7
Children are not employed or exploited.

6.7.1

Company policy for not use child labor in Policy of *Pekerja Anak* (No. 03) on 2 January 2015. Based on the document, states that children under the age of 18 may not work in company. This policy has been socialized on February 22, 2019 which was attended by 19 workers. However, based on field observation to Block 04G Afdeling 1, child worker was found to assist the harvesting work. Based on explanation, the company has not been able to demonstrate the implementation of child labor policies effectively. **Non conformity No 2019. 06.**

6.7.1

Status: Non Conformity No. 2019. 06 with Major category

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

6.8.1 & 6.8.2

Company has policy related to nondiscrimination and equal opportunity listed in Policy of *Persamaan Kesempatan Kerja* which explained that PT. Perkebunan Nusantara IV (Persero) abolishes all forms of ethnic, religious, racial, gender, age discrimination, work disabilities. Based on field observation and interview with spraying female worker, it is known that there is no issue or complain from worker regarding discrimination. Also, information from representative of worker union stated that there is no issue related discrimination. The workers that has been interviewed is came from various social origin, race, and religion.

6.8.3

Company kept the personal file of each worker in estate office. Based on interview with management, the recruitment is conducted through the company requirement. The new recruitment is conducted in accordance with the procedure. It is based on skill, capabilities, and health condition for all workers. Worker promotion, mutation or demotion is done through the employee performance assessment. Company shows employee recruitment documents in the form of job application letters, copies of family cards, curriculum vitae, and then obtains a letter of appointment to become a temporary daily worker and then obtains a letter of appointment for class IA orientation period according to Decree NO 04.11 / Kpts / R / 12 / I / 2019 date January 31, 2019

Status: Comply

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

6.9.1, 6.9.2, 6.9.3

Based on company regulation, employees must not commit immoral acts or other actions that harm the company. Based on interview with female worker in Estate, it is known that they understand the policy. It is also known that they understand the mechanism of complaint submission. Also, interview with committee of Gender Committee, it is known that there is no issue or complaint related to sexual harassment on the workplace.

Company has formed gender committee for handling the harassment issue around female workers. Complaint can be submitted to board of bipartite cooperation, gender committee, or their foreman. Based on interview with the board of gender committee, the company provides the female worker with menstrual leave, pregnant and nursing leave for about 3 months. Pregnant and nursing female worker is prohibited to work related to chemical. And also, Company give special breast feeding time for female worker, but prohibit the worker from working with chemical material.

Status: Comply

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

Based on production data and interviews with representatives of the management representative, the company currently does not receive fruit from third parties. FFB that is received and processed in mill only comes from the own estate and estate from group, such as Meranti Paham, Ajamu, and Panai Jaya.

Status: Comply

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

6.11.1 & 6.11.2

Determination of local development programs based on proposal assistance from previous year. However, based on interview with representative of Sungai Raja and Simpang Merbau Village, it is known that company has implemented CSR program in those village.

Programs for local development are listed in the Community Development program, for example:

- Assistance in building mosques in Labuhan Batu Regency
- Distribution of compensation for orphans and Duafa
- Assistance for elementary, middle and high school uniforms

- Distribution of food packages in Berangir, Pasang Lela, Sungai Raja, Simpang Merbau, and Aek Kota Batu Village

Implementation for the program, for example as follows.

Distribution of assistance for elementary, middle and high school level uniforms on 25 January 2019 which was attended by 14 people from PTPN IV Berangir and elementary, middle and high school teachers who received assistance.

However, company does not conduct any partnership with smallholder.

Status: Comply

6.12

No forms of forced or trafficked labour are used.

6.12.1; 6.12.2; 6.12.3

Based on document review, field observation, and interviews with worker and stakeholders, it is known that there is no migrant labor, including forced labor and illegal labor. The recruitment is done according to the company's procedure. All workers have work agreement that explain about the obligation and rights of the worker, and other provision. They work based on the contract and work order. Based on field observation and interviews with the workers in Estate and Mill, it is known that there is no discrimination among them. They came from local and nonlocal worker. Based on field observation in estate, auditors did not sighted any harvester accompanied by their wife or children. Based on interview bipartite cooperation member, there is no issue related to force labor.

Based on interview with the harvester and committee of worker union, there were no complaint about working hours. The payment is based on tonnage. If they did not get the tonnage after working hours is out, they will be paid by daily payment.

Status: Comply

6.13

Growers and millers respect human rights

6.13.1

Company has policy on human rights issued in November 2 January 2015. The policy explains that the company respect human rights for all employees. Based on interview with worker in estate, mill and local contractor, they know and understand about workers' rights. And also, from consultation with internal stakeholder (worker union), it is known that there is no complaint related to human rights violation. If there was a complaint, the complaint can still be resolved by amicable way between employees.

Status: Comply

PRINCIPLE #7 Responsible development of new plantings

7.1

A comprehensive and participatory independent social and environmental assessment is undertaken prior to establishing new plantings or operations, or expanding existing ones, and the results incorporated into planning, management and operations.

7.1.1; 7.1.2; 7.1.3

There is no new planting and/or new expansion after November 2005. Based on interviews with management and document review known that the operational area of the Berangir Estate has been managed since 1974 and has now entered the second cropping cycle.

Status: Comply

7.2

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

7.2.1 and 7.2.2

Based on the PT Perkebunan Nusantara IV Unit Berangir area statement, it is known that there was no new planting since previous assessment (ST-2).

Status: Comply

7.3		
New plantings since November 2005, have not replaced primary forest or any area required to maintain or enhance one or more High Conservation Values.		
7.3.1; 7.3.2; 7.3.3 ;7.3.4 and 7.3.5		
There is no new planting and/or new expansion after November 2005. Based on interviews with management and document review known that the operational area of the Berangir Estate has been managed since 1974 and has now entered the second cropping cycle. Furthermore disclosure on this matters has reported to the RSPO on August 2 nd 2018.		
	Status: Comply	
7.4		
Extensive planting on steep terrain, and/or on marginal and fragile soils, is avoided.		
7.4.1 and 7.4.2		
Based on the PT Perkebunan Nusantara IV Unit Berangir area statement, it is known that there was no new planting since previous assessment (ST-2).		
	Status: Comply	
7.5		
No new plantings are established on local peoples' land without their free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.		
7.5.1		
Based on documents review, interview and field visits, it is known that the Company did not expand the operational area and there is no more land clearing activity after 2005.		
	Status: Comply	
7.6		
Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their free, prior and informed consent and negotiated agreements.		
7.6.1, 7.6.2, 7.6.3, 7.6.4, 7.6.5, 7.6.6		
Based on documents review, interview and field visits, it is known that the Company did not expand the operational area and there is no more land clearing activity after 2005.		
	Status: Comply	
7.7		
Use of fire in the preparation of new plantings is avoided other than in specific situations, as identified in the ASEAN guidelines or other regional best practice.		
7.7.1 and 7.7.2		
Based on information from PTPN IV – Berangir management unit, Government Agencies of Labuhan Batu Utara (BPN, Agriculture Agency and Environment Agency), as well as from surrounding village representatives (Sei Raja and Pasang Lela Village), it could be concluded that there is no new development or expansion areas after November 2005. PTPN IV Berangir unit has established since 1974 and currently managed for the 2 nd cycle of planting.		
	Status: Comply	
7.8		
New plantation developments are designed to minimise net greenhouse gas emissions.		
7.8.1		
There is no new planting and/or new expansion after November 2005. Based on interviews with management and document review known that the operational area of the Berangir Estate has been managed since 1974 and has now entered the second cropping cycle.		
	Status: Comply	

PRINCIPLE #8 Commitment to continuous improvement in key areas of activity

8.1 Growers and millers regularly monitor and review their activities and develop and implement action plans that allow demonstrable continuous improvement in key operations.

8.1.1

The Berangir Management Unit, PTP Nusantara IV has shown records of continuous improvement, such as:

Environment Aspect

- Conducting waste reduction efforts in the form of solid waste utilization, i.e all shells and fiber produced in Berangir Mill are used as fuel boiler.
- Recycling nutrient with liquid waste (POME) utilization (land application), empty fruit bunch (EFB) application, progressive prune (putting fronds in interrow), and plant residu on replanting activities (chipping stem) as organic fertilizer.

Aspects of Best Management Practices:

- The company has implemented a commitment to continuous improvement, such as:
- Biological leaf caterpillar pests control by planting and maintaining (conservation) beneficial plants, such as *Antigonon leptosus*, *Cassia cobanensis*, and *Turnera subulata*.
- Since 2018, Berangir Estate was no longer using Paraquat.

Manpower Aspect

Conduct employee assessment every year

Status: Comply

3.2 Summary of Assessment Report of Supply Chain Requirement

3.2.1. General chain of custody requirements for the supply chain

Clause	Requirement
5.1	Applicability of the general chain of custody requirements for the supply chain
5.1.1	<p>The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. After the end product manufacturer, there is no further requirement for certification.</p> <p>The organization take legal ownership and physically handles RSPO certified sustainable oil palm products. The entire area, mill and storages are owned by the organisation and all processing from FFB to CPO/PK are done by Berangir Mill. The CPO and PK transporter are under contract with PTPN IV, which are:</p> <ul style="list-style-type: none"> - PT. Wahana Adidaya Pertiwi (CPO transporter) - CV. Karya Mandiri (PK transporter) - CV. Dini Arta Lestari (PK transporter)
	Status: Comply
5.1.2	<p>Traders and distributors require a license obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model.</p> <p>The site does not buy from any RSPO licensed traders. CSPO and CSPK are produced from certified FFBs processed that supplied from its own estates.</p>
	Status: Comply
5.1.3	<p>Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform.</p> <p>The parent company are member of RSPO (PT. Perkebunan Nusantara IV (PERSERO)):</p> <ul style="list-style-type: none"> - Number of RSPO membership: 1-0082-09-000-00 - RSPO IT Platform of Berangir Palm Oil Mill: RSPO_PO1000004134
	Status: Comply
5.1.4	<p>Processing aids do not need to be included within an organization's scope of certification.</p> <p>Parent company or site has no processing aids</p>
	Status: Comply
5.2	Supply chain model
5.2.1	<p>The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.</p> <p>The organization has applied mass balance supply chain model correctly and there is no declassification. The mill received FFB from own estate (Berangir Estate) that has been certified and also from uncertified area such as Meranti Paham Estate (subsidiary of PTPN IV).</p>

	Status: Comply
5.2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.
	The organization has applied mass balance supply chain model only
	Status: Comply
5.3	Documented procedures
5.3.1	The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified.
	Berangir Mill has the documents of supply chain procedures for Mass Balance models No. document 04.03/UNIT/SUS/P/001 dated 1 Augustus 2018, revised 1 April 2019. The procedures established and covering all elements of the supply chain model requirements, records and reports of compliance with supply chain requirements including responsibilities of each key personnel involved, definition, the FFB reception process, weighing, checking quality, processing, monitoring refined products, mass balance calculations, delivery of the product. The procedure is according to RSPO SCCS 21 November 2014, revised 14 June 2017. Based on field observation at Weighbridge station and interview with sampled person in the Mill, the operator has knowledge and able to demonstrate the implementation of SCCS.
	Status: Comply
5.3.2	The site shall have a written procedure to conduct annual internal audit
	The Procedure to conduct annual internal audit are describe in SOP No. 21 dated 2 January 2018 covering all audit for sustainable palm oil including SCCS. In the SOP mentioned that internal audit are done annually. Internal audit of SCCS conforms to the requirements in the RSPO SCCS and the RSPO market communications and claims documents and effectively implements and maintains the standard requirements. The last internal audit are conduct at 11-13 Juni 2019 with finding regarding to SCCS key persons, contractor agreement and management review. Those finding have been followed up and corrected by mill.
	Status: Comply
5.4	Purchasing and goods in
5.4.1	The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier
	Berangir Mill has not purchased CSPO or CSPK. The mill received FFB from certified and uncertified sources. Based on documents verification of FFB receives for example on June 2019 are known that all data such as name, address, date of transaction, date of issued claim, transport documentation were match without any non compliance.
	Status: Comply
5.4.2	The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents
	Berangir Mill has not purchased CSPO or CSPK. However The procedure of handling non-conforming oil palm products of FFB received (certified or non-certified) has describe that non-conforming oil palm products as a false in FFB received notes (certified or non certified) and regarding of FFB received records. To handling on this non-conforming are to corrected the record base on FFB source (certified or non certified areas) and monitored by mass balance record documents.
	Status: Comply
5.5	Outsourcing activities
5.5.1	

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

The company has the agreements with a third parties in terms of transporting CPO & PK that ensure the compliance of RSPO SCCS and the certification bodies have access to the outsourcing contractor or operation if an audit is deemed necessary. Examples of these contracts are as follows:

- PT. Wahana Adidaya Pertiwi (CPO transporter) agreement No. 04.09/S.Perj/07/II/2019 dated 2 January 2019
- CV. Karya Mandiri (PK transporter) agreement No. 04.05/S.Perj/15/III/2019 dated 20 March 2019
- CV. Dini Arta Lestari (PK transporter) agreement No. 04.05/S.Perj/02/II/2018 dated 8 February 2018

Status: Comply

5.5.2

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

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

The company has legal ownership of CPO and PK products which in the transport of CPO and PK are given to third parties. The agreements with contractors are ensure the compliance of RSPO SCCS and the certification bodies have access to the outsourcing contractor or operation if an audit is deemed necessary. Examples of these contracts are as follows:

- PT. Wahana Adidaya Pertiwi (CPO transporter) agreement No. 04.09/S.Perj/07/II/2019 dated 2 January 2019
- CV. Karya Mandiri (PK transporter) agreement No. 04.05/S.Perj/15/III/2019 dated 20 March 2019
- CV. Dini Arta Lestari (PK transporter) agreement No. 04.05/S.Perj/02/II/2018 dated 8 February 2018

Status: Comply

5.5.3

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

Transportation of CPO and PK has been carried out by third parties and the company has detailed records of the contractors used, as follows:

- PT. Wahana Adidaya Pertiwi (CPO transporter) address Medan – North Sumatera
- CV. Karya Mandiri (PK transporter) address Serdang Bedagai – North Sumatera
- CV. Dini Arta Lestari (PK transporter) address District of Batubara – North Sumatera

Status: Comply

5.5.4

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

A contractor used (names and contact details) has been informed to the CB, which are:

- PT. Wahana Adidaya Pertiwi (CPO transporter)
- CV. Karya Mandiri (PK transporter)
- CV. Dini Arta Lestari (PK transporter)

Status: Comply

5.6	Sales and goods out															
5.6.1																
The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form: The name and address of the buyer																
The site has product information provided in such as document of weighbridge ticket, delivery order and other invoices. Such as the CPO delivery No. 18/BPR/MM/MS/VI/2019 at 18 June 2019 contract No. 0126/HOLD/CPO-L/N-IV/V/2019 for 26,270 Kg. The informations that provided on the invoices are:																
<ul style="list-style-type: none">- The name and address of the buyer;- The name and address of the seller;- The loading or shipment / delivery date;- A description of the product RSPO certified Mass Balance model- The date on which the documents were issued;- The quantity of the products delivered;- Any related transport documentation;- etc.																
	Status: Comply															
5.7	Registration of transactions															
5.7.1																
Supply chain actors who:																
<ul style="list-style-type: none">• are mills, traders, crushers and refineries; and• take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable																
Berangir Mill has registered all transactions in RSPO IT platform.																
	Status: Comply															
5.7.2																
The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:																
<ul style="list-style-type: none">• Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures.• Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually.• Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.• Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.																
Transactions are registered in RSPO IT platform as for periods Period of 20 July 2018 – 19 July 2019																
<ul style="list-style-type: none">• Certified CPO sold to each buyer																
<table><tr><th>Date</th><th>Buyer</th><th>Volume (Ton)</th></tr><tr><td>29-04-2019</td><td>PT Multimas Nabati Asahan</td><td>500</td></tr><tr><td>22-04-2019</td><td>PT Permata Hijau Palm Oleo</td><td>500</td></tr><tr><td>12-04-2019</td><td>PT Unilever Oleochemical Indonesia</td><td>500</td></tr><tr><td colspan="2">TOTAL</td><td>1,500</td></tr></table>		Date	Buyer	Volume (Ton)	29-04-2019	PT Multimas Nabati Asahan	500	22-04-2019	PT Permata Hijau Palm Oleo	500	12-04-2019	PT Unilever Oleochemical Indonesia	500	TOTAL		1,500
Date	Buyer	Volume (Ton)														
29-04-2019	PT Multimas Nabati Asahan	500														
22-04-2019	PT Permata Hijau Palm Oleo	500														
12-04-2019	PT Unilever Oleochemical Indonesia	500														
TOTAL		1,500														
There is any certified product (CSPO) sold as conventional is 20,277 MT and has been removed stock in palmtrace.																
<ul style="list-style-type: none">• Certified Palm Kernel sold to each buyer																

Date	Buyer	Volume (Ton)
5-31-2019	PT Perkebunan Nusantara IV PPIS Pabatu	88.30
25-04-2019	PT Perkebunan Nusantara IV PPIS Pabatu	71.73
25-04-2019	PT Perkebunan Nusantara IV PPIS Pabatu	666.67
30-03-2019	PT Perkebunan Nusantara IV PPIS Pabatu	666.67
Total		1,405.07
.		
	Status: Comply	
5.8	Training	
5.8.1		
The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff		
SCCS training are planned annually, for example training on 12 June 2019 that has been reviewed and documented		
	Status: Comply	
5.8.2		
Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed		
The company has provided training at 12 June 2019 for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements, such as: mill process assistant, security, weighbridge operator, etc. Based on interview at weighbridge station is known that the weighbridge operator and SCCS person in charge have understand the RSPO supply chain procedures.		
	Status: Comply	
5.9	Record keeping	
5.9.1		
The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements		
The site has maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of RSPO Supply Chain Certification Standard requirements. Thoose are describe in this ASA-1 report on section of Module E CPO Mills - Mass Balance Requirements.		
	Status: Comply	
5.9.2		
Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock		
The retention times for all records and reports are keep in minimum 2 years According to the documents of supply chain procedures for Mass Balance models No. document 04.03/UNIT/SUS/P/001 dated 1 Augustus 2018, revised 1 April 2019. The mill have RSPO certified in July 2018 and based on documents verification it's concluded that the record of supply chain are available since the mill was certified.		
	Status: Comply	
5.9.3		
The organization shall be able to provide the estimate volume of palm oil / palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.		

FFBs, CSPO and CSPK produced and/or claimed records are kept in minimum 12 months. Record of all certified palm oil / palm kernel oil volumes purchased (input) and claimed (output) for period of 20 July 2018 to June 2019

Period	CPO production (MT)		Total	CSPO Dispatch (MT)		
	Cert	Non Cert		RSPO	Conventional	Other Scheme
Total	23,990	8,368	32,358	2,616*	20,277	0

*There are 2,616 MT CSPO sent to buyer, but only 1,500 MT CSPO until June 2019 has been registered in palmtrace .

Period	PK production (MT)		Total	CSPK Dispatch (MT)		
	Cert	Non Cert		RSPO	Conventional	Other Scheme
Total	4,773	1,938	6,711	4,400*	0	0

*There are CSPK dispatch 4,400 MT, but only 1,405 MT CSPK sold as RSPO certified product and the rest stored in KCP Pabatu (Pabatu Penghancuran Inti Sawit)

Status: Comply

5.10 Conversion factors

5.10.1

Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org); RSPO Rules for Physical Transition of Oleochemicals and its Derivatives. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries

The site doesn't applied a conversion rate.

Status: Comply

5.10.2

Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.

The site doesn't applied a conversion rate.

Status: Comply

5.11 Claims

5.11.1

The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.

Based on announcement and transaction report documents review, it concluded that all RSPO certified products submitted are in compliance with the RSPO Rules on Market Communications and Claims.

Status: Comply

5.12 Complaints

5.12.1

The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.

Procedures for stakeholders complaints established in the document No. 13 dated 2 January 2015. Based on complaints document verification is known that there is no complaint regarding SCCS for last a year.

Status: Comply

5.13 Management review

5.13.1

The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken

The company has management review conduct annually at 14 June 2019.	
	Status: Comply
5.13.2 The input to management review shall include information on: <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard. • Customer feedback. • Status of preventive and corrective actions. • Follow-up actions from management reviews. • Changes that could affect the management system. • Recommendations for improvement. 	
The content of management review related to SCCS are the result of internal audit, customer feedback, work process, preventive and corrective actions, follow up actions and recommendations for improvement.	
	Status: Comply
5.13.3 The output from the management review shall include any decisions and actions related to: <ul style="list-style-type: none"> • Improvement of the effectiveness of the management system and its processes. • Resource needs. 	
The Management review are include the decision and actions related to improvement of the effectiveness of the management system and its processes and Resource needs.	
	Status: Comply

3.2.2 (Module E) CPO Mills - Mass Balance Requirements

Clause	Requirement																		
E.1	Definition																		
E.1.1																			
Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and volume sales of RSPO certified producers. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.																			
SCSS module used in Berangir Mill is Mass Balance (MB), because the mill receives FFB from the estate that has been certified by RSPO and non-certified RSPO.																			
	Status: Comply																		
E.2	Explanation																		
E.2.1																			
The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the CB in the public summary of the P&C certification report. This figure represents the total volume of certified palm oil product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced should then be recorded in each subsequent annual surveillance report.																			
Estimate product certified CPO and PK for period 20 July 2019 – 19 July 2020 describe at this ASA-1 report (basic info 1.8.3). Actual tonnage in period 20 July 2018 – 19 July 2019:																			
<table><tr><th rowspan="2">Products</th><th colspan="3">Tonnes/year</th></tr><tr><th>Estimate</th><th>New Estimate</th><th>Actual (until June 2019)</th></tr><tr><td>CSPO</td><td>25,393</td><td>26,664.38</td><td>23,990</td></tr><tr><td>CSPK</td><td>4,837</td><td>5,492.29</td><td>4,773</td></tr></table>		Products	Tonnes/year			Estimate	New Estimate	Actual (until June 2019)	CSPO	25,393	26,664.38	23,990	CSPK	4,837	5,492.29	4,773			
Products	Tonnes/year																		
	Estimate	New Estimate	Actual (until June 2019)																
CSPO	25,393	26,664.38	23,990																
CSPK	4,837	5,492.29	4,773																
*The projected volume has been extended on 20 June 2019.																			
	Status: Comply																		
E.2.2																			
The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).																			
Transactions are registered in RSPO IT platform as for periods Period of 20 July 2018 – 19 July 2019																			
• Certified CPO sold to each buyer																			
<table><tr><th>Date</th><th>Buyer</th><th>Volume (Ton)</th></tr><tr><td>29-04-2019</td><td>PT Multimas Nabati Asahan</td><td>500</td></tr><tr><td>22-04-2019</td><td>PT Permata Hijau Palm Oleo</td><td>500</td></tr><tr><td>12-04-2019</td><td>PT Unilever Oleochemical Indonesia</td><td>500</td></tr><tr><td colspan="2">TOTAL</td><td>1,500</td></tr></table>		Date	Buyer	Volume (Ton)	29-04-2019	PT Multimas Nabati Asahan	500	22-04-2019	PT Permata Hijau Palm Oleo	500	12-04-2019	PT Unilever Oleochemical Indonesia	500	TOTAL		1,500			
Date	Buyer	Volume (Ton)																	
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22-04-2019	PT Permata Hijau Palm Oleo	500																	
12-04-2019	PT Unilever Oleochemical Indonesia	500																	
TOTAL		1,500																	
There is any certified product (CSPO) sold as conventional is 20,277 MT and has been removed stock in palmtrace.																			
• Certified Palm Kernel sold to each buyer																			
<table><tr><th>Date</th><th>Buyer</th><th>Volume (Ton)</th></tr><tr><td>5-31-2019</td><td>PT Perkebunan Nusantara IV PPIS Pabatu</td><td>88.30</td></tr><tr><td>25-04-2019</td><td>PT Perkebunan Nusantara IV PPIS Pabatu</td><td>71.73</td></tr><tr><td>25-04-2019</td><td>PT Perkebunan Nusantara IV PPIS Pabatu</td><td>666.67</td></tr><tr><td>30-03-2019</td><td>PT Perkebunan Nusantara IV PPIS Pabatu</td><td>666.67</td></tr><tr><td colspan="2">Total</td><td>1,405.07</td></tr></table>		Date	Buyer	Volume (Ton)	5-31-2019	PT Perkebunan Nusantara IV PPIS Pabatu	88.30	25-04-2019	PT Perkebunan Nusantara IV PPIS Pabatu	71.73	25-04-2019	PT Perkebunan Nusantara IV PPIS Pabatu	666.67	30-03-2019	PT Perkebunan Nusantara IV PPIS Pabatu	666.67	Total		1,405.07
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30-03-2019	PT Perkebunan Nusantara IV PPIS Pabatu	666.67																	
Total		1,405.07																	

	Status: Comply		
E.3	Documented procedures		
E.3.1			
The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:			
a. Complete and up to date procedures covering the implementation of all the elements in these requirements;			
b. The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site procedures for the implementation of this standard.			
Berangir Mill has the documents of supply chain procedures for Mass Balance models No. document 04.03/UNIT/SUS/P/001 dated 1 Augustus 2018, revised 1 April 2019. The procedures established and covering all elements of the supply chain model requirements, records and reports of compliance with supply chain requirements including responsibilities of each key personnel involved, definition, the FFB reception process, weighing, checking quality, processing, monitoring refined products, mass balance calculations, delivery of the product. The procedure is according to RSPO SCCS 21 November 2014, revised 14 June 2017. Based on field observation at Weighbridge station and interview with sampled person in the Mill, the operator has knowledge and able to demonstrate the implementation of SCCS.			
	Status: Comply		
E.3.2			
The site shall have documented procedures for receiving and processing certified and non-certified FFBs.			
Berangir Mill has the documents of supply chain procedures for Mass Balance models No. document 04.03/UNIT/SUS/P/001 dated 1 Augustus 2018, revised 1 April 2019. The procedure describes the process of FFB admissions from estates and processing certified and non-certified FFBs.			
	Status: Comply		
E.4	Purchasing and goods in		
E.4.1			
The site shall verify and document the volumes of certified and non-certified FFBs received.			
The site has verified and documented the volumes of certified and non-certified FFBs received. Certified and non-certified FFB received period of 20 July 2018 to June 2019			
Month	FFB (ton)		
	RSPO Certified	Non Certified	Total
20 July 2018	2,938	2,584	5,523
August 2018	9,449	4,698	14,147
September 2018	9,778	4,299	14,077
October 2018	11,977	3,838	15,816
November 2018	10,804	4,824	15,628
December 2018	10,950	4,032	14,982
January 2019	8,395	3,391	11,785
February 2019	8,141	2,904	11,045
March 2019	7,573	3,167	10,740
April 2019	8,129	2,913	11,042
May 2019	8,354	3,513	11,868
June 2019	3,689	658	4,348
Total	100,178	40,820	140,998

Status: Comply
E.4.2
The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.

There is overproduction of certified tonnage. Actual tonnage in period 20 July 2018 – 19 July 2019:

Products	Tonnes/year		
	Estimate	New Estimate	Actual (until June 2019)
CSPO	25,393	26,664.38	23,990
CSPK	4,837	5,492.29	4,773

*The projected volume has been extended on 20 June 2019.

Status: Comply
E.5 Record keeping
E.5.1

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

The Certificate holder has record and balance all received of RSPO FFB and deliveries of RSPO certified CPO and PK. The Volume of certified CPO and PK are delivered from accounting system according to conversion by percentage of FFB certified. The sales of RSPO product claim for period of 20 July 2018 – June 2019 are sold from a positive stocks:

Period	CPO production (MT)		Total	CSPO Dispatch (MT)		
	Cert	Non Cert		RSPO	Conventional	Other Scheme
Total	23,990	8,368	32,358	2,616*	20,277	0

*There are 2,616 MT CSPO sent to buyer, but only 1,500 MT CSPO until June 2019 has been registered in palmtrace .

Period	PK production (MT)		Total	CSPK Dispatch (MT)		
	Cert	Non Cert		RSPO	Conventional	Other Scheme
Total	4,773	1,938	6,711	4,400*	0	0

. *There are CSPK dispatch 4,400 MT, but only 1,405 MT CSPK sold as RSPO certified product and the rest stored in KCP Pabatu (Pabatu Penghancuran Inti Sawit)

Status: Comply

3.3. Conformity Checklist of Certificate and Logo Use

1.	Evidence of permission or approval certificate and logo from Certification Body which submitted by Client	X or√
ASA 1	There is no logo used.	NA
	Status: NA	
2.	Implementation of certificate and logo used by Client comply with size and type (shape) against Guideline of Logo Use	X or√
ASA 1	There is no logo used.	NA
	Status: NA	
3.	Implementation of Certificate and Logo is not used on product	X or√
ASA 1	There is no logo used.	NA
	Status: NA	
4.	Controlling of Certificate and Logo, including withdrawing inappropriate logo.	X or√
ASA 1	There is no logo used.	NA
	Status: NA	

3.3 Summary of RSPO Partial Certification.

Compliance of the uncertified management units of PTPN IV 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.

- a. PTPN IV Time Bound Plan (TBP) is explaining in table section 1. PTPN IV has run 13 mills and 30 estates in Indonesia. All mills and estates are operated in Indonesia. PTPN IV has informed the TBP progress through head office in Indonesia. Based on the information get from PTPN IV website, there are acknowledge majority shareholder own by PTPN IV that not included in the Time Bound Plan. The description of this majority shareholder are PT Agro Sinergi Nusantara (50.64% of PTPN IV and 49.36% of PTPN I) and PT Sinergi Perkebunan Nusantara (71.28% of PTPN IV and 28.72% of PTPN XIV)
- b. MUTU has verified partial certification for un-certified unit's subsidiary of PTPN IV based on their Time Bound Plan. PTPN IV gives the positive assurance based on the partial certification declaration only. The company was not able to show supporting document to strengthen the statement such as internal audit and other relevant evidence.
- c. MUTU Auditor has verified company partial certification and concludes that:
 - There are no systems or mechanism conducted by PTPN IV to ensure the compliance against indicator 2.1;2.2;6.3;6.4; 7.3; 7.5;7.6 such as internal audit or other assessment of compliance
 - The time bound plan did not cover all subsidiaries under PTPN IV
 - There is no written documentation for time bound plan which is isolated lapses.

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p>Yes and positive assurance is produced for these units.</p> <p>Auditor verification</p> <p>There are external audit that has been conducted for management units of Air Batu, Berangir, Sawit Langkat, Pasir Mandoge, Timur, PT Agro Sinergi Nusantara and PT Sinergi Perkebunan Nusantara. There is some non conformance find in internal audit and the company has produced the positive assurance for these units.</p>
2.1.2	<p>No replacement after dates defined in Nis Criterion 7.3 of:</p> <ul style="list-style-type: none"> • Primary forest. • Any area identified as containing High Conservation Values (HCVs). • Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3. 	<p>PTPN IV has submitted liability disclosure to RSPO.</p> <p>Based on PTPN IV disclosure of liability there is one (1) estate that has liability</p> <p>PTPN IV has sent their liability disclosure to the RSPO Compensation Panel (rspocompensation@rspo.org in 2016. PTPN IV has been update their liability disclosure and also sent LUCA on 2018. There is one (1) unit that has non-compliant land clearance.</p> <p>Auditor verification</p> <p>Auditor has verified the supporting evidence of above the company statement. The above statement in accordance with the supporting evidence provided.</p>
2.1.3	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	No new planting/land clearing after 1 st January 2010. All planting in PTPN IV management units are old plantation that was planted before November 2005.

		<p>Auditor verification</p> <p>PTPN IV has sent their liability disclosure and LUCA to the RSPO Compensation Panel (rspocompensation@rspo.org) in 2016. PTPN IV has been update their liability disclosure and also sent LUCA on 2018. There is one (1) unit that has non-compliant land clearance without HCV before 2010.</p>
2.1.4	Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	<p>There is no land conflicts.</p> <p>Auditor verification</p> <p>The company has SPO of conflict area menagement No.4 (revise 2) january 2, 2015 has explain that problem solving of conflict area is conducted by negotiation which involves leader of dispute area and determine the compensation done by negotiation until they reach agreement</p> <p>There is evidence of documented land dispute resolution for the uncertified units.</p>
2.1.5	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	<p>There is no labor disputes.</p> <p>Auditor verification</p> <p>There is no information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries.</p> <p>The company has a mechanism for dealing with complaints and dissatisfaction in the SOP of Internal Communication and Employee Grievance Handling (internal) (No. 19 (Revision 1) effective from January 2, 2015), SOP Handling Customer Complaints and Environment (external) (No. 13 (Revision 1) effective from January 2, 2015) and there are SOP of Communication and Public Consultation (No. SPO 03, revision 02, the effective date of January 2, 2015).</p> <p>The Company has a policy to protect the identity of the Whistle Blowing that stated in the documents of Infringement Complaint Management System (Whistle Blowing System) PT Perkebunan Nusantara IV (Persero) on 2013 in Article 10: Protection For Reporter.</p>
2.1.6	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	<p>Yes, there is no legal non-compliance is being processed.</p> <p>Auditor verification</p> <p>The company has a complete list of regulations that includes local regulations, national regulation and international regulation.</p> <p>The procedure explains that the person responsible for the</p>

		management of legal documents are the Head of General Affairs and and Human Resources. The company has kept a list of rules and regulations in 1nd semester of 2016 at the Head of General Affairs and Human Resources Departement and has distributed to each division office in hardcopy and softcopy.
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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 ST-2

NCR No.	: 2018.01	Issued by	: Mohamad Amarullah
Date Issued	: 15 March 2018	Time Limit	: ASA-1
NC Grade	: Minor	Date of Closing	: 16 April 2018
Standard Ref. & Requirement	: 2.1.3 A mechanism for ensuring compliance shall be implemented.		
Non-Conformance Description & Evidence observed (filled by auditor): PTPN IV Berangir unit has shows document list of Laws and Regulations which adopted for oil palm plantation activities dated October 2 nd 2017. However, evaluation records towards laws/regulaitons fulfillment of PTPN IV Berangir Unit for period 2017 is not available. This matter is not in accordance with procedure No. SPO.21 dated January 2 nd 2015 about internal audit RSPO and ISPO.			
Root Cause Analysis (filled by organization audited): The respective officer which already appointed by Berangir Estate Manager has absent to evaluate semester regulations fullfilment as well as its update.			
Correction (filled by organization audited): To evaluate oil palm plantation related regultions fullfilment in Berangir Estate.			
Corrective Action (filled by organization audited): The respective person in charge (PIC) shall consistently evaluate and monitor regulation update regularly every semester, as mentioned in the procedure. Furthermore the Manager shall ensured that evaluation on this matter has well implemented by the PIC.			
Assessor Evaluation and Conclusion (filled by auditor): 28 March 2018 The company has describe root cause analysis, correction and corrective action which already implemented. However, evidence such as documents of circulation letter, appointment letter, evaluation of regulation report are not available. Hence, NCR No. 2018.01 is still remain open . 16 April 2018 The company has able to shows several evidence, as follows: <ul style="list-style-type: none">Decree of Berangir Manager Letter No. BER/MU/Kpts/03/XII/2017 dated December 1st 2017 about appointment of PIC in Berangir Business Unit which responsible for regulation monitoring, eveluation and update for RSPO requirement purposes. The PIC was derived from Assistant and Staff from General Human Resources and Security Department.Evaluation of regulation fullfilment report which required as part of RSPO compliance dated March 20th 2018, approved by Unit Manager. The report informed that evaluation has conduted on 7 regulations related to legal and permit, 5 regulations related to best management practices and environment, 33 regulaitons related to manpower and 25 regulations related to environment management. Based on explanation above, it could be concluded that the company has evaluate the regulaiton fullfilment. Consistency towards this matters will be observed on the surveillance assessment. Hence, the NCR No. 2018.01 is considered closed . Verification at ASA-1			

<p>The company shows the procedure in the form of basic guidelines and work instructions for identifying and evaluating compliance with laws and regulations and other requirements No. document 04.01/KOL/P/034 dated 1 August 2018. The procedure regulates mechanisms/procedures to ensure compliance with legal requirements (regulations) that are relevant for plantation operations. The procedure has been socialized to the parties concerned and can be accessed by the estate. Then the company shows evidence of evaluating compliance with regulations carried out on 3 May 2019. Based on this verification, Minor non conformity on stage 2 can be stated as Closed.</p>	
Verified by	: Mohamad Amarullah & Leonada

NCR No.	: 2018.02	Issued by	: Mohamad Amarullah
Date Issued	: 15 March 2018	Time Limit	: 14 March 2019
NC Grade	: Major	Date of Closing	: 11 May 2018
Standard Ref. & Requirement	2.2.1 Documents showing legal ownership or lease, history of land tenure ownership/control, and the actual legal use of the land shall be available.		
Non-Conformance Description & Evidence observed (filled by auditor): Operational map of PTPN IV Berangir Unit is not revised since 2007 and not synchronized with the latest HGU issued in 2009. Based on HGU and Operational map review, it was known that shape of polygon boundary beetwen both map were not match. For example as could be seen in Afdeling 2 Block 01F and Afdeling 5 Block 05BP. Furthermore, based on field observation to Afdeling 2 Block 01F, BPN pole was not found.			
Root Cause Analysis (filled by organization audited): <ul style="list-style-type: none">The appointed PIC were absent to responsible on identification (number, location and condition) of Legal BPN/HGU document and fail to make coordination with Department of Law and Land from PTPN IV Head Quarter (HQ).Socialization on updating document towards BPN poles monitoring and maintenance activities to the PIC and Document Controller are not yet given.			
Correction (filled by organization audited): <ul style="list-style-type: none">To make a operational map which in accordance with the latest Land Title Map year 2009 as reference.To conduct monitoring and maintenance on BPN Poles in Berangir Estate, as well as its reporting.To conduct socialization towards monitoring, maintenance and reporting management to the respective PIC and Document Controller.			
Corrective Action (filled by organization audited): <ul style="list-style-type: none">Assistant of General Human Resources and Document Controller to consistently check and monitor all documents (include Map), as well as distribute it to the respective Departments, as mentioned in the procedure.Team of BPN Poles Monitoring will regularly monitor the condition on Poles every six months, as mentioned by Estate Manager Decree and always make a good coordination with Department of Law and Land in PTPN IV HQ.			
Assessor Evaluation and Conclusion (filled by auditor): 28 March 2018 The company has describe root cause analysis, correction and corrective action. However, the respective documents mentioned in the description are not available, such as Job Description of PIC and Operational Map for 2018. Hence, NCR No. 2018.02 is still remain open .			
16 April 2018 The company has able to shows several evidence, as follows: <ul style="list-style-type: none">Decree of Berangir Manager Letter No. BER/MU/Kpts/06/XII/2017 dated December 4th 2017 about appointment			

of Officers whose responsible for BPN Poles identification and monitoring (number, location and condition). The appointed PIC is required to make a good coordination with Department of Law and Land for further additional field survey if needed. The PIC were consist of Plantation Head Assitant, General Human Resources and Security Staff and Estate Afdeling Assistants. BPN poles onitoring will be carried out every six month.

- Unit Manager Circulation Letter No. BER/SE/Intrn/69/III/2018 and No. BER/SE/Intrn/72/III/2018 dated march 19th 2018 about monitoring of documents and reporting to the Government Agencies Reports related to RSPO and ISPO compliance. Availability of those documents were responsibled by General Human Resources Assistant and Document Controller.
- The company has shows monitoring update of document revision related to RSPO which approved by the Human Resources Assistant on January 1st 2018. The document has informed that the most updated Operational map which refers to the Land Title (HGU) Map year 2009 as reference was not available. Regarding this matter the PIC has make coordination with Department of Law and Land and Department of Information Technology (IT) in PTPN IV HQ to update the operational map thus in accordance with Land Title Map 2009.

According to explanation above, it could be concluded that follow up evidence such as identification and monitoring of BPN Poles by team which already commisioned since May 9th 2017, as well as evidence of coordination between Estate Management and Department of Law and Land HQ were not available. NCR No. 2018.02 is still remain **open**.

11 May 2018

The company has shows document No. BER/04.13/0/V/2018 dated May 9th 2018 about report of Berangir Estate BPN Poles Monitoring, which informed location of poles, coordinate, poles condition and remarks. Recapitulation of monitoring is presented in the following Table:

No.	Afdeling	Poles Condition		Position		Loss	Total
		Good	Broken	Comply	Move		
1	I	60	3	62	1	-	63
2	II	30	4	34	-	-	34
3	III	27	2	28	-	1	29
4	IV	127	5	131	-	1	132
5	V	74	7	78	-	3	81
6	VI	89	6	95	-	-	95
Total		407	27	428	1	5	434

According to to monitoring results above, Estate Manager has propose activity of installation of five BPN poles and reparation of 27 BPN broken poles. Furthermore, Operational map which suits with Land Title Map has also available.

Based on description of root cause analysis, corrective action and correction evidence given, it could be concluded that NCR No. 2018.02 is considered **closed**.

Verified by : **Mohamad Amarullah**

NCR No.	: 2018.03	Issued by	: Mohamad Amarullah
Date Issued	: 15 March 2018	Time Limit	: 18 September 2019
NC Grade	: Minor raised to Major	Date of Closing	: 22 August 2019
Standard Ref. & Requirement	2.2.2 Legal boundaries are demonstrated clearly and maintained.		
Non-Conformance Description & Evidence observed (filled by auditor): Based on HGU map review, it was known that there were 169 pcs of BPN poles. Furthermore, based on poles monitoring review on January 2018, it was informed that there were 523 poles has identified on the ground. Regarding this matter,			

identification of BPN and supporting poles is not clear. Moreover, based on observation to BPN Pole No. 165 (Afdeling 5 Block 08G), No. 126 (Afdeling 5 Block 08G), No. 111 (Afdeling 4 Block 06J) and No. 028 (Afdeling 2 Block 01F), it was known that all poles were not found on the ground. From the explanation above, it could be concluded that the company is not be able to shows BPN Poles has properly installed (available) on the ground and satisfactory maintained.

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

- The appointed PIC were absent to responsible on identification (number, location and condition) of Legal BPN/HGU Poles and fail to make coordination with Department of Law and Land from PTPN IV Head Quarter (HQ).
- Socialization on updating document towards BPN poles monitoring and maintenance activities to the PIC and Document Controller are not yet given.
- Lack of coordination, especially with workers whose responsible for making isolation drains, towards existence of BPN poles. This activity has suspected the loss of BPN poles.

Correction *(filled by organization audited):*

- To conduct socialization towards monitoring, maintenance and reporting management to the respective PIC and Document Controller.
- To conduct monitoring and maintenance on BPN Poles in Berangir Estate, as well as its reporting.
- To make a program of maintenance/reparation and installation of broken and/or lost BPN poles.
- Adjust the position of the HGU poles in the field with the HGU map.
- Adjusting the coordinates by using GPS when monitoring and adjusting HGU stakes according to the advice of the National Land Agency of the North Sumatra Regional Office.

Corrective Action *(filled by organization audited):*

- The appointed officers shall consistantly implementing monitoring, manitenance and reporting condition of BPN poles as described in the program.
- Conduct monitoring again to ensure all HGU poles in the field are in accordance with the HGU map and evaluate the monitoring to find out and supervise whether the monitoring results are in accordance with the conditions in the field

Assessor Evaluation and Conclusion *(filled by auditor):*
28 March 2018

The company has describe root cause analysis, correction and corrective action. However, the respective documents mentioned in the description such as Job Description of PIC, as well as BPN poles identification, monitoring and monitoring report are not available. Hence, NCR No. 2018.03 is still remain **open**.

16 April 2018

The company has able to shows Decree of Berangir Manager Letter No. BER/MU/Kpts/06/XII/2017 dated December 4th 2017 about appointment of Officers whose responsible for BPN Poles identification and monitoring (number, location and condition). The appointed PIC is required to make a good coordination with Department of Law and Land for furhter additional field survey if needed. The PIC were consist of Plantation Head Assitant, General Human Resources and Security Staff and Estate Afdeling Assistants. BPN poles onitoring will be carried out every six month. However, evidence of document as mentioned in the correction column were not available. Hence NCR No. 2018.03 is still remain **open**.

11 May 2018

The company has shows document No. BER/04.13/0/V/2018 dated May 9th 2018 about report of Berangir Estate BPN Poles Monitoring, which informed location of poles, coordinate, poles condition and remarks. Recapitulation of monitoring is presented in the following Table:

No.	Afdeling	Poles Condition		Position		Loss	Total
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5	V	74	7	78	-	3	81
6	VI	89	6	95	-	-	95
Total		407	27	428	1	5	434

According to monitoring results above, Estate Manager has propose activity of installation of five BPN poles and reparation of 27 BPN broken poles. Furthermore, Operational map which suits with Land Title Map has also available.

Based on description of root cause analysis, corrective action and correction evidence given, it could be concluded that NCR No. 2018.03 is considered **closed**.

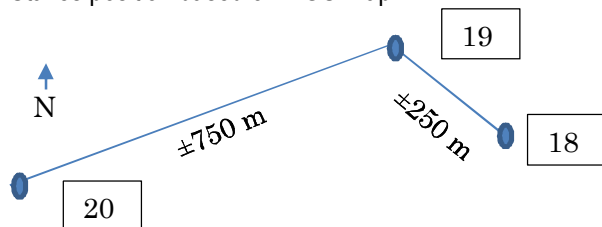
Verification at ASA-1

Based on the verification on this ASA, it is known that the company currently still does not have the HGU benchmark coordinates from the land agency. The company has coordinated with the land agency but the land agency still not been able to issue the HGU coordinates of the Berangir unit. Evidence of coordination is shown in the meeting document with the land agency of North Sumatra provincial on 15 April 2019. The results of the meeting included the statement that the land agency was unable to issue coordinates before the extension of the HGU. Then the company can determine the coordinate point internally which refers to the HGU map.

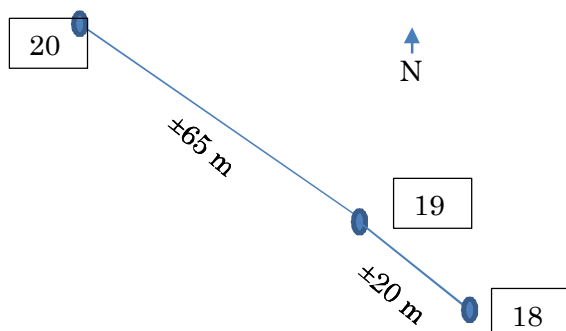
Based on the map of land area No. 11/12/2009 dated 14 August 2009 it was found that the HGU boundary stakes consisted of 45 stakes and based on map No. 10/12/2007 it is known that the HGU boundary stakes consist of 124 stakes, so the total stakes are 169 stakes. However, based on the monitoring of stakes carried out by the company there are 451 stakes that have not been identified with the gap between HGU stakes and auxiliary stakes. Monitoring the stakes is also accompanied by cartesian coordinates (x, y axis).

Based on the field observation, there is found a stakes No. 18, 19 and 20 blocks 05 BN in good condition and well maintained. However, the position of stakes in the field is not yet in accordance with the form of the post position on the map (field map No.11/12/2009).

Stakes position based on HGU map:



Stakes position based on field observation:



Based on the results of verification at ASA 1, it can be concluded that the company has not been able to show evidence of HGU stake inventory (number of stakes and coordinates) according to the HGU stake map and the actual position of HGU stakes in the field is not in accordance with the HGU stake map, so this becomes a recurring non conformity in indicators of 2.2.2 (**NC 2018.03 minor raised to major**).

Verification June 18, 2019

The company has sent root cause analysis, corrections and corrective actions. But this needs to be fixed again. The company also has not shown evidence of improvements made, so that this Nonconformity can not be declared fulfilled.

Verification July 24, 2019

The company shows evidence of the following improvements:

- Manager's Decree No. BER / MU / Kpts / 06 / IX / 2017 dated 4 September 2017 concerning the appointment of field officers in the management of boundary poles.
- Memo Manager No. BER / MU / M / VI / 2019 dated June 27, 2019, assignment of inventory of HGU poles plan for July 1 - 18 2019.
- Letter from Estate manager No. BER / 04.13 / 05 / VII / 2019 dated 18 July 2019 to the legal and land affairs section of PTPN IV related to the coordination and confirmation of HGU poles.
- Memo from the strategic planning section No. 04.03 / Kol / M-21 / II / 2019 dated February 19, 2019 to the legal and land affairs section of PTPN IV related to the coordination and confirmation of HGU poles
- Socialization of monitoring and inventory of HGU poles on July 1, 2019
- SOP for maintenance of HGU boundary no. SPO 12 on January 2, 2015.

Major Verification August 22, 2019

The company shows some evidence of improvements in the form of:

- Follow up on Manager's letter to PTPN IV Legal and Land Affairs No. BER / 04.13 / 05 / VII / 2019 dated 18 July 2019 with the summoning of Berangir Unit representatives to meet with the National Land Agency Representative on 29 July 2019.
- Minutes of the meeting between PTPN IV and North Sumatra BPN on July 29, 2019 which was attended by 3 BPN parties and 1 PTPN IV representative from the Central Office and 1 Representative from the Berangir Unit. Based on the results of the meeting it was stated that the BPN could not provide information on the coordinates of the HGU Poles that had already existed, bearing in mind that at the time the HGU was being issued there were still limited infrastructure so that archiving had not been done digitally, besides that the BPN suggested itself by the plantation, based on PT HGU owned and laying poles in accordance with the HGU Map owned.
- Follow-up from the Manager's Memo related to the inventory of HGU stakes carried out on 1-18 July 2019 found stakes of 451 poles, In the monitoring results report in addition to the number of poles and the coordinates there were also explained some information such as information on land owner who borders the company, location of poles, the condition of the poles, and information on the installation period of the new / old poles. As for the results of marking the coordinate points of the stakes that have been inventoried the management can show the distribution map of the 451 stakes found (the shape of the stakes distribution is almost in accordance with the 2 maps of the field owned), however, until verification is performed, it cannot be determined which poles are the main poles according to the map of the fields owned, namely 45 poles (Land map No. 11/12/2009 dated August 14, 2009) and 222 stakes (Landmap No. 10 / 12/2007), so total poles is 267.
- Follow up on the difference in the location of the poles No. 18, 19 and 20 BN 05 blocks with map No.11 / 12/2009, management representatives consisting of Assistant Afdeling 5, mandor , and production krani held a meeting with community representatives consisting of Head of Dusun Berangir, and 3 residents Berangir village which has land in an area bordering poles No. 18, 19 20 block 5 BN Afdeling 5 on August 19, 2019. After a meeting the management requested a letter of ownership of land owned by the relevant parties in the future will be measured together to determine the location of the stake adjusted to the HGU map owned.
- The management shows the work plan for Adjusting the Benchmark HGU Number: BER/M /183/VIII/2019 dated August 22, 2019 from the document known plans and timelines for implementation as follows:
 - Collection of community land ownership certificates on 26-29 August 2019

- Sending a letter to the land legal department related to the results of a meeting with the community on 31 August
- Afdeling conducts an inventory and determination of initial poles and auxiliary poles on 2-4 September 2019
- Request for making a digital map and the process of making a map on 7 -31 September 2019
- Evaluation of the results of the Digital map with the suitability in the field and the HGU Map after the map is sent to the Unit.

Based on the results of the field visit and the evidence presented by the management, this nonconformity was stated to be fulfilled with a note that it would be verified at the time of the next audit to ensure management plans and adjustments to the poles had been made. **Close With Observation**

Verified by : **Mohamad Amarullah & Leonada & Bayu Yogatama**

NCR No.	: 2018.04	Issued by	: Mohamad Amarullah
Date Issued	: 15 March 2018	Time Limit	: 14 March 2019
NC Grade	: Major	Date of Closing	: 31 May 2018
Standard Ref. & Requirement	4.7.3 Record of Occupational Health and Safety (OHS) Program (see 4.8) and Personal Protective Equipment (PPE) training in accordance with the result of hazard identification and risk analysis shall be available to all worker		
Non-Conformance Description & Evidence observed (filled by auditor): <ul style="list-style-type: none">Based on observation of Harvest activity in Block 05V Afdeling 3, it is known that the harvester does not use PPE eye protection.Based on observations to the Berangir POM Workshop , found the welder did not use PPE gloves.Based on observations to the Engine Room, found Operator did not use safety boot (only using regular boot). <p>Based on the above facts, the company has not been able to show evidence that the use of PPE has been in accordance with the results of risk analysis.</p>			
Root Cause Analysis (filled by organization audited): <p>The operators and/or workers were lack of understanding towards potential risk which could be happen if not wear PPE as in accordance with their job/station.</p>			
Correction (filled by organization audited): <ul style="list-style-type: none">To make circulation/instruction letter about compulsory of PPE usage and sanction that will be given for those whose not follows the instruction.To make socialization about function and usage of PPE during works activity which aims to minimize work accident risk.			
Corrective Action (filled by organization audited): <p>To conduct monitoring of PPE usage pursuance of workers, as well as checking of appropriateness of PPE condition.</p>			
Assessor Evaluation and Conclusion (filled by auditor): 28 March 2018 <p>The company has describes root cause analysis, correction and corrective action. However, supporting documents such as Circular Letter of Manager, monitoring form of PPE usage, etc. were not available. Hence NCR No. 2018.04 is still remain open.</p>			

31 May 2018

The company shows Berangir Unit Business Manager Circular Letter No. BER/SE/Intrn/III/2018 dated march 19th 2018 about compulsory of PPE usage for all workers. This Letter has distributed to all Head of Agencies, Assistant Afdeling, Assistant Processing, Assistant of Warehouse, Assistant of General and Human Resources and Plantation Labor Union. Especially for chemist workers, the PPE set shall be stored on the special place/warehouse provided by estate management.

Socialization of PPE usage has conducted on March 20th 2018, attended by 16 workers. Furthermore, socialization and/or refreshment has also delivered during daily muster morning on the estate and mill. Document of monthly monitoring of PPE usage which prepared by Foreman and Assistant, as well as records of PPE delivery for all workers in the estate and mill in 2017 were also available.

Based on description of root cause analysis, corrective action and correction evidence given, it could be concluded that NCR No. 2018.04 is considered **closed**.

Verified by : **Mohamad Amarullah and Haikal Ramadhan Kharismansyah**

NCR No.	: 2018.05	Issued by	: Mohamad Amarullah
Date Issued	: 15 March 2018	Time Limit	: ASA-1
NC Grade	: minor	Date of Closing	: 31 May 2018
Standard Ref. & Requirement	4.7.5 A procedure for emergency and work accident shall be available in Indonesian Language; and the workers who attended the first aid training are available in the working area		
Non-Conformance Description & Evidence observed (filled by auditor): The Company has a provision of reference of First Aid equipment at Work , established by Prima Medika Nusantara Clinic (Polyclinic estate) on January 2, 2018, ie 21 items for mill and 12 items for estate. Based on field visits to the Engine Room and Workshop of Berangir mill, it was found that the contents of first aid equipment were not in accordance with the reference (less than 21 items), then based on observations to Afdeling 3 Block 05V, it was found that the contents of the first aid bags were less than 12 items (5 items). Related to this fact, the company has not been able to demonstrate that the equipment of first aid equipment available at the work site has been in accordance with the specified reference. In addition, based on a visit to the Plantation Polyclinic Berangir, found the existence of drugs that have expired, namely Stardine which has expired since September 2017.			
Root Cause Analysis (filled by organization audited): Dereliction of the PIC to monitor expired date of medicine stored on the polyclinic and lack of understanding towards completeness of first aid box items, as recommended by regulation.			
Correction (filled by organization audited): <ul style="list-style-type: none">To check expired date of medicine items on the estate polyclinic, permanent and portable and first aid kit boxes which brings by Foreman.To complete first aid kit boxes in all Berangir Unit operational areas, as required by regulation.			
Corrective Action (filled by organization audited): <ul style="list-style-type: none">Socialization on medicine monitoring and completeness of first aid items to the PIC.			

- To conduct a regular monitoring of checking towards completeness and expired date of medicines and all items on the first aid kit boxes.

Assessor Evaluation and Conclusion (filled by auditor):
28 March 2018

The company has describes root cause analysis, correction and corrective actions. However, supportive related documents such as monitoring form on First Aid Kit Box and receipt of medicine and/or devices transaction were not available. Hence, NCR No. 2018.05 is still remain **open**.

31 May 2018

The company shows inspection of First Aid Kit Box and expired date of medicine records in Berangir Mill and Estate, which conducted by Medical Officer (Nurse). The record informed that there were 23 items and 12 items of First Aid Kit Box for Mill and Estate, respectively. The form has informed items availability, condition and date of expired of medicine stored on the clinic and First Aid Kit Box. The records were approved by polyclinic doctor of Berangir Unit.

Based on description of root cause analysis, corrective action and correction evidence given, it could be concluded that NCR No. 2018.04 is considered **closed**.

Verification at ASA-1

Based on the field verification at Berangir Mill and Berangir Estate at ASA-1, it was concluded that the contents of the first aid kit owned by the company were in accordance with the specified contents.

Verified by : **Mohamad Amarullah and Haikal Ramadhan Kharismansyah**

NCR No.	: 2018.06	Issued by	: Mohamad Amarullah
Date Issued	: 15 March 2018	Time Limit	: ASA-1
NC Grade	: minor	Date of Closing	: 31 May 2018
Standard Ref. & Requirement	4.7.7 Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics.		
Non-Conformance Description & Evidence observed (filled by auditor): In P2K3 (OSH Committee) reports Quarter 1 to 4 of 2017, it is stated that there is no work accident in the estate and factory, so the calculation of Lost Time Accident (LTA) is zero accident. However, based on records of occupational accidents belonging to the Polyclinic of Berangir Estate in the same period, it is known there are 8 (eight) cases of work accidents, one of which recommends that the worker must rest (not working). Related to this, the company has not been able to show evidence that the work accident monitoring report has been in line with actual workplace accident incidents in the field, including its LTA calculations.			
Root Cause Analysis (filled by organization audited): Lack of coordination and dereliction of the PIC on updating records of work accident to clinic record.			
Correction (filled by organization audited): <ul style="list-style-type: none">• The unit manager to make a circulation letter to the PIC for accident record and calculation of lost time accident (LTA) monitoring, as refers to the clinic records.• To make accident monitoring report and calculation of LTA as recorded by the clinic.			
Corrective Action (filled by organization audited): <ul style="list-style-type: none">• To conduct monitoring on accident happens and calculate its LTA regularly.			

- To conduct refreshment to the respective PIC about their job description.
- The respective PIC to reports accident record regularly on the monthly OSH Committee meeting.

Assessor Evaluation and Conclusion (filled by auditor):
28 March 2018

The company has describes root cause analysis, correction and corrective actions. However, supportive related documents such as circulation letter of PIC appointment, monitoring of work accident and LTA calculation for period 2017 and 2018 were not available. Hence, NCR No. 2018.05 is still remain **open**.

31 May 2018

The company shows Manager Circulation Letter No. BER/SE/73-A/III/2018 dated March 20th 2018 about PIC appointment for accident recording and LTA calculation. The PIC were consist of Assistant of General Human Resources and Security and Document Controller for ISPO/RSPO. Furthermore, recapitulation of work accident in Berangir Mill and Estate during period 2017 and 2018 is presented as follows:

Berangir POM Period 2017

- Number of Employees: 156 Workers.
- Total working hours: 2,080 hours.
- Number of Accident: 3 times.
- Total Manday Lost: 3 days.
- Frequency Rate: 9.245.
- Severity Rate: 9.245.

Berangir POM Period 2018

No/Nill Accident.

Berangir Estate Period 2017

- Number of Employees: 387 Workers.
- Total working hours: 2,080 hours.
- Number of Accident: 5 times.
- Total Manday Lost: 5 days.
- Frequency Rate: 6.211.
- Severity Rate: 6.211.

Berangir Estate Period 2018

No/Nill Accident.

Based on description of root cause analysis, corrective action and correction evidence given, it could be concluded that NCR No. 2018.06 is considered **closed**.

Verification at ASA-1

Based on verification of work accident report documents and interviews with company doctors, it is known that since June 2018 until the ASA-1 audit was carried out, there were no work accidents in the area of the company. The company can also show the LTA calculation for a period of 1 year before the ASA-1 audit is conducted (June 2018 sd May 2019).

Verified by : **Mohamad Amarullah and Haikal Ramadhan Kharismansyah**

NCR No.	: 2018.07	Issued by	: Mohamad Amarullah
Date Issued	: 15 March 2018	Time Limit	: ASA-1

NC Grade	:	minor	Date of Closing	:	31 May 2018
Standard Ref. & Requirement	:	5.2.2 Where rare, threatened or endangered (RTE) species and or other HCVs are present or affected by the plantation and mill operations, an appropriate measures that are expected to maintain or enhance them shall be implemented through a management plan			
Non-Conformance Description & Evidence observed (filled by auditor): The Company already has HCV and RTE management plans as well as RTE for the period of 2017 and 2018, one of which mentions the arrangement and marking of boundary areas. Based on observations to Afdeling 5 Block 08C (HCV 1.1 and 4.1) and Block 08F (HCV 1.1 and 4.2), it is known that it has not been implemented Based on observations to Afdeling 5 Block 08C (HCV 1.1 and 4.1) and Block 08F (HCV 1.1 and 4.2), it is known that the management of the estate is still carrying out the palm tree maintenance activities (pesticide application). this is not in accordance with the HCV report recommendation report which states that there is no cleaning in the area and that this is not yet covered by the HCV management and monitoring plan of 2017 and 2018. In this regard, the plan has not been in accordance with the recommendations of the 2011 HCV Report.					
Root Cause Analysis (filled by organization audited): <ul style="list-style-type: none">• HCV management plan has not referred to the recommendation of HCV identification report.• Lack of understanding of the officers on the implementation of the duties and responsibilities afforded to him, as explained by HCV report.					
Correction (filled by organization audited): <ul style="list-style-type: none">• Create a Circular Letter from the Unit Manager related to the determination of the PIC responsible for monitoring the management of the HCV area.• Develop a 2018 HCV management and monitoring plan that refers to the recommendations of the 2011 HCV identification report.• To conduct HCV boundaries marking on the field as identified on the HCV report.• Not undertaking upkeep activities (pesticide application) in accordance with the recommendations of the 2011 HCV report.					
Corrective Action (filled by organization audited): <ul style="list-style-type: none">• Consistently implement HCV programs in accordance with HCV report recommendations, and report on their progress regularly, included marking boundry maintenance.• Conduct upkeep activities in accordance with the recommendations of HCV identification reports.• Socialization to all workers (especially agrochemicals applicators) towards HCV management implementation on the field.					
Assessor Evaluation and Conclusion (filled by auditor): 28 March 2018 The Company describes the root cause analysis, correction and corrective action to be implemented. However, it has not been able to show supporting documents, such as Circular Letter of Appointment of PIC monitoring of HCV program, HCV area management plan 2018 and its realization, and evidence of HCV area marking activity in the field. Then NCR No.2018.07 has still remain open . 31 May 2018 The Company shows the Decision of the Manager of the Business Unit Berangir Number: Bermu/kpts/32/VIII/2017 regarding the field officers in the management and implementation of HCV related to RSPO Berangir Business Unit. The letter has explained the job description and the composition of the implementing member (consisting of 1 chairman and 11 officers).					

It has been shown the progress of area marking and HCV boundary performed by marking by red paint on the palm trunk and HCV sign boards. In the document of HCV management and monitoring plan made by HCV Identification Officer dated March 14, 2018 has informed about the type of HCV, location, management action, HCV monitoring indicator, monitoring objectives, benchmark, method, period and person in charge. The management has included plan for prohibition of agrochemicals (fertilizer and pesticide) application in HCV areas.

Based on the root cause, correction, and corrective action, the nonconformity is stated to be comply. Status **Closed**.

Verified by : **Haikal Ramadhan Kharismansyah and Mohamad Amarullah**

NCR No.	: 2018.08	Issued by	: Mohamad Amarullah
Date Issued	: 15 March 2018	Time Limit	: 14 March 2019
NC Grade	: Major	Date of Closing	: 31 May 2018
Standard Ref. & Requirement	: 5.3.2 There shall be evidence that all chemicals and their empty containers are disposed of responsibly		
Non-Conformance Description & Evidence observed (filled by auditor): Inventory of chemical containers contained in hazardous and toxic waste management procedures No.SPO 02 effective date January 02, 2017 revision 03. The procedure states that any Hazardous and Toxic waste may not be intended for other purposes and must be submitted directly to the licensed Hazardous Waste Storage. However, based on field observations found among others: <ul style="list-style-type: none">Used paint and thinner containers around the land application pumping area of Berangir Mill and the Afdeling 2 Housing area.Used containers of mill chemicals are used as containers for water storage in Afdeling 2 housing.Used oil and filter packaging in the Afdeling 2 residential area.			
Root Cause Analysis (filled by organization audited): <ul style="list-style-type: none">The absence of officers performing towards monitoring activities on hazardous waste management in Afdeling Housing areas.The lack of understanding of workers and residents of employees' housing areas regarding hazardous waste management procedures in accordance with company procedures.			
Correction (filled by organization audited): <ul style="list-style-type: none">Establish a Circular Letter of the Unit Manager regarding the assignment of officers (PICs) responsible for carrying out monitoring activities for the management of used packaging of Hazardous Waste reused for other purposes, throughout the company's operational area, including the employee housing area.Carry out management monitoring (including reuse) of hazardous waste packaging caused by company and residential operational activities, throughout the company's management area.To conduct socialization on hazardous waste management to workers and their families in Afdeling Housing.Send back used paint cans, thinners, used jugs of chemicals, oil packaging and oil filters to licensed temporary hazardous waste storage.			
Corrective Action (filled by organization audited): Implement monitoring of hazardous waste and hazardous waste disposal activities throughout the company's management area, including residential areas, both produced by the company's operational activities as well as small-scale businesses in the Afdeling housing area.			

Assessor Evaluation and Conclusion (filled by auditor):
28 March 2018

The Company describes the root cause analysis, correction and corrective action to be implemented. However, it has not been able to show supporting documents such as confirmation letter of PIC and evidence of monitoring of the use of used hazardous packaging materials, evidence of hazardous waste removal encountered during field observation, evidence of hazardous waste management socialization to employees and residents of residential areas, company policies related to activities workshop and buying and selling fuel in housing areas, etc. Hence Non-conformity No. 2018.08 has not been fulfilled.

31 May 2018

The Company shows Circular Letter of Unit Manager No. BER/SE/Intrn/68/III/2018 dated March 19th, 2018 about Pesticide Used Packaging Management addressed to All Division Chief, Assistant Afdeling Afd I to VI, Processing Assistant, Human Resources and General Assistant, Warehouse Assistant and Labor Union. Circular letter stipulates the obligation to preserve the environment and health of the employees to immediately return the hazardous waste packing (ex fertilizer sack, pesticide jerry cans, and other chemicals) after completion for at least 1 week immediately returned to licensed temporary hazardous waste storage. For business activities carried out in the plantation area and potentially generate hazardous waste, the business owner shall be obliged to manage the hazardous waste packaging by collecting and carrying the designated place. If no compliance will be given a reprimand and sanctions. Officers responsible for carrying out the management are afdeling chemical warehouse officers and mill.

The company shows socialization on domestic and hazardous waste management evidence, i.e. absence record, which carried out in March 24th 2018, attended by 12 Housing Occupant representatives. Furthermore, Circular Letter of Unit Manager has also distributed to all PIC for Housing Areas.

Estate management shows records of hazardous waste materials for period of March 2018, which informed source of hazardous waste, type of waste, date and volume or quantity. The record mentioned that hazardous waste such as nine used chemical containers, e.g. used lubricant, paint and thinner containers.

Based on description of root cause analysis, corrective action and correction evidence given, it could be concluded that NCR No. 2018.08 is considered **closed**.

Diverifikasi oleh	:	Haikal Ramadhan Kharismasnyah and Mohamad Amarullah
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NCR No.	:	2018.09	Issued by	:	Mohamad Amarullah
Date Issued	:	15 March 2018	Time Limit	:	14 March 2019
NC Grade	:	Major	Date of Closing	:	17 May 2018
Standard Ref. & Requirement	:	6.1.3 Plans for management and monitoring of social impacts to avoid or reduce negative impacts and promote positive ones, based on social impact assessment, through consultation with the affected parties, shall be available, documented and timetabled, including responsibilities for implementation			
Non-Conformance Description & Evidence observed (filled by auditor): A 2017 social impact management program can be demonstrated and a record of its realization, but no scheduled social impact management programs for the 2018 period were developed in a participatory manner together with affected communities.					
Root Cause Analysis (filled by organization audited): There is no PIC who responsible for preparing and establishing the social impact management program that should be conducted through parcitipative method with the affected communities.					

Correction (filled by organization audited): <ul style="list-style-type: none"> • Manager issued the circular letter related on responsible PIC regarding to social impact management plan preparation. • Developing a social impact management program for 2018 in a participatory way together with affected communities. • To Conduct a training/socialization of the social impact management programs in a participatively. 	
Corrective Action (filled by organization audited): Prepare a periodically social impact management program together with affected communities and conduct a training to PIC assigned.	
Assessor Evaluation and Conclusion (filled by auditor): 28 March 2018. The company has describes root cause analysis, correction and corrective action. However, supporting documents such as Manager Circular Letter for PIC appointment, evidence of socialization, program social impact which partisipatively arranged by surrounding communities, etc. were not available. Hence NCR No. 2018.04 is still remain open . 17 May 2018, The Company has submitted evidence of correction such as evidence of participatory activities in the formulation of a social impact management plan namely results of community interviews (forms) on April 6, 2018 (11 participants), also has been shown social impact management program for the period of January to December 2018 which details the program, schedule, success indicator, result and PIC. In addition there is a letter of assignment of the responsible PIC in regard of SIA programs preparation through circular letter No. BER/SE/73/III/2018 dated March 20, 2018 and decree No. BER/MU/Kpts/29/VIII/2017 as much as 4 officers and details of responsibilities. Has been shown the evidence of training of SIA programs preparation to PIC assigned, held on 4 April 2017. Hence, NCR No. 2018.09 is stated closed .	
Verified by	: Mohamad Amarullah and Sandra Purba

3.5.1 Identification of Findings, Corrective Actions and Observations at ASA-1

NCR No.	: 2019.01	Issued by	: Hasiholan Sihombing
Date Issued	: 20 June 2019	Time Limit	: 18 September 2019
NC Grade	: MAJOR	Date of Closing	: 22 August 2019
Standard Ref. & Requirement	: 4.7.3 Records of Occupational Health and Safety (OHS) program (see 4.8) and Personal Protective Equipment (PPE) training in accordance with the result of hazard identification and risk analysis shall be available to all workers.		
Evidence observed (filled by auditor): The company has a PPE Replacement Mechanism in the Circular Letter (No: BER/SE/Intern/24/II/2019), which explains when found damaged PPE, the administrative officer made the damage PPE reports and made a report on the request for new PPE replacement. Based on field observations and interviews with workers at the Berangir Mill and Berangir Estate, the facts of the field were found as follows: <ul style="list-style-type: none">1 worker at the kernel station, 1 worker at the engine room station, 1 worker at the chemical warehouse, 1 worker at the temporary storage of hazardous and toxic materials, 1 worker at the water treatment plant, 2 harvesters at the division I, 1 harvester at the division IV, 2 pesticide applicators at the division II and 3 manual weeding workers at the division IV using PPE shoes that do not meet company standards (purchased by the workers themselves because the shoes that provided by the company are damaged before the new replacement period).			
Non-Conformance Description (filled by auditor): Based on that evidences, the company has not been able to demonstrate the implementation of PPE management according to the procedure owned.			
Root Cause Analysis (filled by organization audited): <ul style="list-style-type: none">- There is no monitoring on the completeness and condition of PPE used by employees- There is still a lack of employee understanding of PPE replacement mechanisms			
Correction (filled by organization audited): <ul style="list-style-type: none">- Make monitoring of the completeness and condition of PPE used by employees every month- Socialize PPE replacement mechanism to all employees who use PPE			
Corrective Action (filled by organization audited): <ul style="list-style-type: none">- Evaluating the completeness and condition of PPE- Evaluate the socialization mechanism of PPE replacement a maximum of 1 month after socialization			
Assessor Evaluation and Conclusion (filled by auditor): Verification July 15, 2019 The company has explained the root cause analysis of the discrepancies that arise as well as corrective actions so that the discrepancies do not arise again in subsequent assessments. However, the company has not yet sent evidence of corrections to the discrepancies that have arisen. This Nonconformity is still not fulfilled. Major Verification August 22, 2019			

The company shows evidence of improvements in the form of:

- Make monitoring of the completeness and condition of PPE used by employees every month (July)
- Monitoring data on PPE usage and PPE conditions in July 2019 in Estate and Mill.
- Minutes of the socialization of the PPE usage mechanism that were carried out in all afdeling and factories on July 17, 2019 which were attended by:
 - Afdeling 1: 43 employees
 - Afdeling 2: 51 employees
 - Afdeling 3: 59 employees
 - Afdeling 4: 43 employees
 - Afdeling 5: 60 employees
 - Afdeling 6: 36 employees
- Evaluate the related mechanism for PPE replacement on August 1, 2019 to 263 Afdeling I-VI employees, from the evaluation results it is known that all employees have understood the mechanism related to the replacement of damaged PPE.
- The 2019 PPE procurement documents (boots, safety shoes, helmets, earplugs) are matched with the size and number of the Berangir unit to the planning section on August 14, 2019.
- Example of a request for replacement PPE that has been damaged from Afdeling 1 harvesting employees with no. 04016764 on July 8, 2019.
- Local procurement documents for PPE consisting of 5 safety shoes and 8 boots for employees whose PPE has been damaged.
- Proof of PPE handover from management to employees whose PPE was damaged on July 9, 2019. (Broken shoes handed over to the company)
- Based on the results of field visits and interviews with Mill employees (1 WTP officer, 1 warehouse officer, 1 sorting officer, and 1 sterilizer operator) and 3 Harvest Employees (Afdeling 5) it is known that employees have used the appropriate PPE and can explain the mechanism of PPE change in accordance with the socialization delivered by the management.
- Based on the results of a visit to the Central Warehouse, it is known that PPE besides Shoes, Earplugs and helmets are available at the Central Warehouse.

Based on field verification and evidence presented by management, Nonconformity was stated to be fulfilled

Verified by	: Hasiholan Sihombing & Bayu Yogatama
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NCR No. Nomor ketidaksesuaian	: 2019.02	Issued by Diterbitkan oleh	: Bayu Yogatama
Date Issued Tanggal diterbitkan	: 20 June 2019	Time Limit Batas Waktu	: ASA-2
NC Grade Grade ketidaksesuaian	: Minor	Date of Closing Tanggal Terpenuhi	:
Standard Ref. & Requirement Acuan Standar & Persyaratan	: 5.2.4 Once the management plan is prepared, continuous monitoring documentation and report regarding the status of the RTE and HCVs are affected by the operations of the plantation and palm oil mill shall be available, and the results of monitoring		

	are to be used to follow-up on the improvement of the management plan.
Evidence observed (filled by auditor): The company has a Monitoring plan for the second semester of 2018 and the first semester of 2019 including. <ul style="list-style-type: none"> • Monitoring the diversity of flora and fauna species • Intensity of interference with river boundaries and springs from fire hazards • Change in river width and river water quality • Signboard condition • Landslide and erosion monitoring • Monitoring the success rate of river border rehabilitation programs • Monitoring the presence of HCV <p>Monitoring, that has been done for 2018 in the form of a sign board condition and monitoring trees in the river border area, whereas plans for other monitoring have not been carried out. While for the 2019 monitoring document, the company has not been able to show the realization of HCV monitoring.</p>	
Non-Conformance Description (filled by auditor): Based on the explanation above, the Company has not been able to show evidence that the entire HCV monitoring plan has been carried out.	
Root Cause Analysis (filled by organization audited):	
Correction (filled by organization audited):	
Corrective Action (filled by organization audited):	
Assessor Evaluation and Conclusion (filled by auditor):	
Verified by	:

NCR No.	:	2019.03	Issued by	:	Bayu Yogatama
Nomor ketidaksesuaian			Diterbitkan oleh		
Date Issued	:	20 June 2019	Time Limit	:	18 September 2019
Tanggal diterbitkan			Batas Waktu		
NC Grade	:	MAJOR	Date of Closing	:	22 August 2019
Grade ketidaksesuaian			Tanggal Terpenuhi		
Standard Ref. & Requirement	:	5.3.2	There shall be evidence that all chemicals and their empty containers are disposed of responsibly		
Acuan Standar & Persyaratan					

Evidence observed (filled by auditor):

The company has an SOP related to the management of Hazardous Waste No. SPO 02 dated January 2, 2017 (Revised 03) and Manager Circular related to LB3 Management on August 14, 2017 which explained that Hazardous Waste must be submitted to Hazardous Waste Warehouse no later than 1 day after use. As for the results of document studies and field observations, the facts are as follows:

Pesticide Used Packaging

- The latest shipment of waste waste to 3rd party licensed by the company on August 28, 2018.
- Documents for the use of Pesticides in 2019 until May, there were known uses of pesticides such as Santafuron as much as 35.88 Kg, Metsulindo as much as 40.02 kg, and Elang (Glyphosate) as many as 2,995.6 ltr.
- However, based on a study of 2019 logbook hazardous waste documents up to June, there was no record of used pesticide packaging that entered the hazardous waste warehouse and based on field observations to the hazardous waste warehouse, Central Pesticide Warehouse and Afdeling Pesticide Warehouse, no pesticide packaging was found.

Medical Waste

- The results of interviews with doctors and paramedics in the clinic are known that until now no records have been made of medical waste produced.
- There is no evidence of handover of medical waste from the clinic to Pabatu Hospital (Medical Waste Destruction)
- Field observation in the clinic area, it is known that the medical waste storage area has not met the minimum storage standard. (placed in an open box).

Based on the explanation above, the Company has not been able to show evidence that all chemical waste and its containers have been disposed of responsibly.

Non-Conformance Description (filled by auditor):

Based on the explanation above, the Company has not been able to show evidence that all chemical waste and its containers have been disposed of responsibly.

Root Cause Analysis (filled by organization audited):

- There is still a lack of employee understanding of hazardous waste management
- There is still a lack of understanding from clinic staff in managing Medical Waste
- Not yet carried out monitoring of the implementation of hazardous Waste and Medical Waste management on a scheduled basis

Correction (filled by organization audited):

- Packaging of used pesticides (Hazardous Waste) is stored in Afdeling because of a lack of understanding of warehouse officials in Afdeling to immediately deliver the used pesticide packaging to the hazardous waste temporary warehouse in accordance with SOP
- CH immediately deliver packaging used pesticides to the hazardous Waste temporary warehouse and conduct a socialization of hazardous waste management to employees on July 16, 2019
- Re-socializing the clinic staff about managing Medical Waste.

Corrective Action (filled by organization audited):

- Conduct an evaluation of the socialization that has been done a maximum of 1 month after the socialization to measure the level of understanding of employees and clinic staff
- Monitor the implementation of hazardous waste and medical waste management routinely and documented.
- Make notes on the entry and exit of Medical Waste in Clinics (Medical Waste Log Book)

Assessor Evaluation and Conclusion (filled by auditor):

Verification July 18, 2019

The company shows evidence of improvements in the form of:

- Minutes of the socialization of Medical Waste management to medical officers conducted on July 3, 2019 at the Berangir Estate Polyclinic attended by 5 attendance clinic officers, outreach materials and documentation of activities attached.
- Minutes of the socialization of Hazardous Waste management to employees conducted on July 16, 2019 in the Meeting Room of the Berangir Estate Central Office Manager, which was attended by 22 employees. Attendance list, socialization material and activity documentation attached.

Verification July 24, 2019

The company shows evidence of improvements in the form of:

Medical Waste Recapitulation Documents stored at the Pabatu Hospital (PT Prima Medica Nusantara) until July 15, 2019.

- Infusion Bottles 6 bottles
- Infusion hose 6 strands
- 30 pcs Syringes
- 30 ampoule medicine bottles
- Used gauze 300 gr
- Plastic and cardboard drug container.

Verification July 30, 2019

The company shows evidence of improvements in the form of:

Goods Issuance Letter No. 033 / JPN-VII / 19 dated July 22, 2019 for PT Jagar Prima Nusantara from the PTPN IV area of the Berangir unit using vehicles with BP number 9149 DU with details:

- Contaminated packaging with manifest no WY 0003230
 - Jerrycan 437.5 kg
 - 270 kg drum
 - Santafuron 7 kg
- Use Rags 6,476.25 kg with manifest no WY 0003229
- 0.9 kg cartridge with manifest no WY 0003232
- 54 kg Used battery with manifest no WY 0003231
- 115 kg Used Oil with manifest no WY 0003233

Major Verification August 22, 2019

The company shows evidence of improvements in the form of:

- Evaluation of the results of the socialization of the management of Medical Waste to 4 Berangir Polikbun officers conducted on 31 July 2019 by the HR Assistant and Polikbun Doctors. From the evaluation results it is known that all four officers have understood the procedures for managing medical waste in polikbun.
- Evaluation of the results of the socialization of Hazardous Waste management to 263 employees in Afdeling I-VI consisting of harvesting employees, which was carried out on July 31, 2019 by the HR Assistant and the afdeling assistant. From the evaluation results it is known that all four officers have understood the procedures for managing medical waste in polikbun.
- Letter of Agreement hazardous waste management No: 210 / FB-ABS / SPK-LB3 / IV / 2019 between Polikbun Berangir and PT Amindy Barokah North Sumatra dated April 1, 2019, which is valid for 1 year.
- Hazardous waste logbook to date August 21, 2019, from the results of the study of documents known to August 21, 2019 LB3 has been stored as follows:

- 21 Jerigen Ex Pesticides
- 43 bottles of Ex metsulindo
- Data on the use of pesticides from July 22 to August 21, it is known that the use of pesticides is as much as
 - 425 liters of Elang 480 SL (Glyphosate) / 20 liters = 21 jerry cans
 - 10.65 kg Metsulindo / 250 gr = 43 btl

Based on the results of the field visit to hazardous waste temporary warehouse, it is known that the number of hazardous waste stored is in accordance with what was recorded in the logbook. Based on field verification and evidence presented by management, the Nonconformity was stated to be fulfilled

Verified by : Bayu Yogatama

NCR No.	: 2019.04	Issued by	: Asystasya Aishah Silalahi
Date Issued	: 20 June 2019	Time Limit	: 18 September 2019
NC Grade	: MAJOR	Date of Closing	: 9 September 2019
Standard Ref. & Requirement	6.5.1 Wage documentation and work requirements must be available in accordance with applicable labor provisions.		
Evidence observed (filled by auditor): incentives for class IA-IID employees of business units. The letter explained that the amount of attendance incentive that was given to each employee was in accordance with the average overtime carried out in the months before this letter was issued. Based on the attendance list of water pump operator with employee code 04016577 IB / 13 in May 2019, the operator's actual working hours are 06.00 - 11.00 and 15.00 - 19.00 (9 hours / day). The employee works every day (25 working days + 6 holidays). Worker get attendance incentives as a substitute for overtime in the amount of Rp. 716,263 (considered 1 month overtime for 80 hours) according to the SE owned. However, if calculated by calculating overtime, then the water machine operator who works every day in the example in May 2019 (25 working days + 6 days off) must get overtime pay of Rp 3,471,912, -			
Non-Conformance Description (filled by auditor): Based on the explanation above, it was concluded that the company had not paid wages for overtime in accordance with applicable regulations.			
Root Cause Analysis (filled by organization audited): The lack of understanding of Krani I in Afdeling regarding the procedure for granting attendance / performance incentives			
Correction (filled by organization audited): socialization of procedures for calculating and awarding overtime and Performance / Attendance Incentives to Krani I throughout the Section			
Corrective Action (filled by organization audited): - Conduct an evaluation of the socialization regarding the calculation and procedures for overtime award and Performance / Attendance maximum 1 month after the socialization to measure the understanding of the			

participants

- Monitor the provision of overtime and attendance / performance incentives by HR, General and Security

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

Verification July 15, 2019

The company has provided root cause analysis, corrective actions, and corrective actions. However, there are still a few points on corrections and corrective actions that still need to be completed by the company. Based on this explanation, the non-conformity No 2019. 04 was declared unfulfilled.

Verification July 24, 2019

The company has provided evidence of improvements in the form of minutes of the socialization of calculations and the provision of overtime and performance / attendance incentives. The socialization was carried out on 5, 6, and 15 July 2019 and was attended by 371 workers from Afdeling 1 - VI and Berangir POM.

Major Verification August 22, 2019

The company shows evidence of improvements in the form of:

- Manager's Decree Number: BER / MU / Kpts / 04 / VII / 2019 dated July 1, 2019 which explains; 1) determination of 5 employees responsible for managing Afdeling clean water sources 2-6. 2) Water Operational Hours in Afdeling, namely 06.00 - 13.00 West Indonesia Time, outside of these operational hours must ask permission from the assistant.
- Minutes of the socialization of the understanding of overtime calculations and incentives carried out at Afdeling I-VI on 5-10 July 2019 to all employees.
- Minutes of Evaluation of the understanding of Overtime and Incentive calculations on August 5, 2019, which was attended by 263 employees of the I-VI affair, from the evaluation results it was known that each employee understood how to calculate overtime / incentive pay.
- Based on the results of the field visit and interviews with the afdeling V water pump officer, it is explained that currently the officer concerned starts work at 06.00 and finishes at 12.00 / 13.00 and there is no water ignition in the afternoon, different things were conveyed by 2 afdeling employee wives 5 that the water is still burning 2 times a day. Namely morning and evening.

However, based on the results of a Water Pump Employee wage study with employee number 4016577 in July 2019 it is known that the wages obtained are Rp 2,470,344 which consists of the base wage of Rp 1,843,407, the Special Allowance of Rp 303,937 and the rice allowance of Rp 323,000. As for the employee's attendance list, it is known that the person doing overtime work for 4 days on holidays. From 4 days overtime the employee gets an incentive of Rp 716,263, this is not appropriate if an overtime calculation is made, the employee concerned should get overtime pay of Rp 799,648. Based on the evidence this Non-Conformity declared to be unfulfilled.

Verification 9 September 2019

The company shows improvements in the form of:

- Internal Memo dated August 1, 2019 no: BER / M / 184 / VIII / 2019 concerning the regulation of Water life hours in Afdeling which is a revision of the SK Manager Manager of Berangir Business Unit number: BER / MU / Kpts / 4 / VII / 2019 on July 1, 2019 It was explained in the revised memo that the operational schedule for water livelihoods in employee housing was conducted at 6:00 to 1:00 pm (Monday - Saturday), 7:30 to 12:30 (Sunday).
- Overtime Recap Calculation documents for water operators in afdeling which are compared between overtime formulations with PTPN IV Incentive + Overtime formulations. From the calculation results it is known that the nominal incentive and overtime provided is greater than the calculation of ordinary overtime.

- salary receipt for 5 machine operators in the August 2019 period. From the list of salary receipts, it is known that the calculation and payment of overtime is in accordance with applicable regulations.

Based on the evidence of improvement shown by management, the nonconformity was stated to be fulfilled.

Verified by : **Asystasya Aishah Silalahi & Bayu Yogatama**

NCR No.	: 2019.05	Issued by	: Asystasya Aishah Silalahi
Date Issued	: 20 June 2019	Time Limit	: ASA 2
NC Grade	: Minor	Date of Closing	:
Standard Ref. & Requirement	6.5.3 Oil palm plantations and mills must provide adequate housing, water supplies, medical needs, education and public facilities that are in accordance with national standards or higher standards, if public facilities are not available or inaccessible		
Evidence observed (filled by auditor): Based on field visits to Afdeling III and V employee housing, it is known that: <ul style="list-style-type: none"> - Bath wash toilet facilities (1 of 2 houses visited on Afd 3) in unfit conditions, namely there is no place for bathing and toilet doors in unfit conditions. - Employees' toilets (2 of the 3 houses observed on Afd 5) are built by the employees themselves) with inadequate conditions (broken doors) - Water from the drainage is flooded to the road 			
Non-Conformance Description (filled by auditor): Based on explanation above, the company has not been able to provide adequate housing facilities for workers.			
Root Cause Analysis (filled by organization audited):			
Correction (filled by organization audited):			
Corrective Action (filled by organization audited):			
Assessor Evaluation and Conclusion (filled by auditor):			
Verified by	:		

NCR No.	: 2019.06	Issued by	: Asystasya Aishah Silalahi
Date Issued	: 20 June 2019	Time Limit	: 18 September 2019

NC Grade	: MAJOR	Date of Closing	: 22 August 2019
Standard Ref. & Requirement	6.7.1 Documented evidence must be available regarding the fulfillment of the workers' minimum age requirements		
Evidence observed (filled by auditor): Company policy for not use child labor in Policy of <i>Pekerja Anak</i> (No. 03) on 2 January 2015. Based on the document, states that children under the age of 18 may not work in company. This policy has been socialized on February 22, 2019 which was attended by 19 workers. However, based on field observation to Block 04G Afdeling 1, child worker was found to assist the harvesting work.			
Non-Conformance Description (filled by auditor): Based on explanation, the company has not been able to demonstrate the implementation of child labor policies effectively.			
Root Cause Analysis (filled by organization audited): Employees still lack understanding of the Child Labor Policy.			
Correction (filled by organization audited): Re-socializing the Child Labor Policy to all employees			
Corrective Action (filled by organization audited): <ul style="list-style-type: none">- Evaluate the socialization that has been conducted a maximum of 1 month of socialization to measure employee understanding- Monitoring in the field especially harvesting employees every day- Monitoring is carried out by the Afdeling Assistant assisted by the Overseer I of each Afdeling when the harvesting is underway.			
Assessor Evaluation and Conclusion (filled by auditor): Verification July 15, 2019 The company has provided root cause analysis, corrective actions, and corrective actions. However, there are still questions on corrective action that still needs to be answered by the company. Based on this explanation, the non-conformity No 2019. 04 was declared unfulfilled.			
Verification July 24, 2019 The company has provided evidence of improvements in the form of: <ul style="list-style-type: none">- Minutes of the socialization of the prohibition on the use of underage workers on 5, 6 and 10 July 2019 to 312 afdeling workers I - VI Kebun Berangir- SK Manager Manager Berangir Business Unit No: BER / MU / Kpts / 3 / VII / 2019 concerning officers who are responsible for monitoring the prohibition on the use of underage workers of the Berangir Gardens unit. Based on the decree, the officer responsible for monitoring the use of underage workers is the assistant and foreman I of each afdeling.			
Major Verification August 22, 2019 The company provides evidence of improvements in the form of: <ul style="list-style-type: none">- Warning letter BER / P / 10 / VI / 2019 from Assistant to employees who bring children to work on June 20, 2019- A statement will not bring the child to work again from the employee with number 407214001 on June 20, 2019.- The evaluation document on the results of the socialization on the prohibition of using underage workers on			

August 1, 2019 was carried out in Afdeling I-VI with the Assistant of each afdeling with a total of 263 employees consisting of Overseers, Pemanaen, Election Officers, Brondolan quoting Officers and chemist officers.

- Monitoring document on the use of child labor in the Berangir Estate from Afdeling 1-6 in July 2019. Monitoring is carried out by the foreman 1 every afdeling and is carried out every day, from the monitoring results it is known that during July 209 no use of underage labor was found.
- Based on the results of field visits and interviews with afdeling 5 employee's wives and harvesters in afdeling 5, it is known that the employee's wife and employee already know about the prohibition of carrying children in any work activity.

Based on field verification and evidence presented by management, the Nonconformity was stated to be fulfilled

Verified by	:	Asystasya Aishah Silalahi & Bayu Yogatama
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3.5.3 Opportunity for Improvement

No	Ref. Std.	Description Deskripsi
1	2.1.1	Progress of plantation bussiness permit for mill issued by Regent of Labuhanbatu Utara.
2	4.4.3	Progress completion of repairing Land Application
3	6.1.3	Providing understanding and involving communities related to social impacts management
4	6.5.2	Workers' understanding about wages component

3.5.4 Noteworthy Positive Components

No	Description
1	Company has obtained an ISPO Certificate
2	Company has obtained SMK3 Certificate
3	Zero accident
4	Company already don't use paraquat
5	Teamwork in providing documents

3.6 Summary of Arising Issues from Public and Auditor Verification

Public Issues (Institution/ NGO/Community)	Auditor Verification
Sei Raja Village Simpang Merbau Village & Previous Land Owner <ul style="list-style-type: none"> The communication and relation between villages around with company are well maintained, the company's public relation already known by the communities. The mechanism for complaint and grievance submission has been understood well by the community There were no significant land disputes and no indication of contractually army or paramilitaries using in plantation area. There are no indigenous rights or customary rights. Plantation of Sawit Langkat are known as long establish dutch colonial plantation. The company has considered satisfactory cooperative and transparent in providing information, for example towards job vacancies. FFB price, CSR and grants. Village people has recognize company representative (PIC) from Division of Public Relation (PR) which handled this matters. The company has cooperation with local contractors from surrounding villages. The company has establish the CSR program to surrounding communities There is no complaints and issues from surrounding villages towards environment aspects 	<p>Based on interview result, it could be concluded that presence of company has considered positively affected surrounding community life and contribute to social economic improvement. Social and environment aspects were satisfactory taken as a part or company operational activity. Further detail from other stakeholder views and document review could be checked on Criteria 1.1, 1.2, 2.2, 5.1, 6.1, 6.2, 6.3, 6.4, 6.8, 6.10 and 6.11 in this report.</p>
CV Dapa Bersama (FFB and EFB Transport Contractor) <ul style="list-style-type: none"> Has been a contractor for FFB transport of Berangir Estate since 2014. Contractors are required by companies to comply with OHS and PPE procurement by contractors itself. Payments to contractors are made on time in accordance with the contract. Communication between the contractor and the company is well established. There are no complaints from contractors. 	<p>Auditor has verified the compliance according to criterion 4.7, 6.3, and 6.10</p>
CV GAS (FFB and EFB Transport Contractor) <ul style="list-style-type: none"> Has been a contractor for FFB transport of Berangir Estate since 2010. Contractors are required by companies to comply with OHS and PPE procurement by contractors itself. Payments to contractors are made on time in accordance with the contract. Communication between the contractor and the company 	<p>Auditor has verified the compliance according to criterion 4.7, 6.3, and 6.10</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>is well established.</p> <ul style="list-style-type: none"> There are no complaints from contractors. 	
<p>SPBUN (Worker Union) Interview with Head of Worker Union</p> <ul style="list-style-type: none"> There is contract workers in Estate for about 1 year in administration division. Contractor worker in upkeep division. Basic wage in accordance with Minimum Wage of Sumatera Utara Province 2019. There is no complaint about wage, overtime payment, or worker welfare issue. Harvesters are paid according to work basic and premium basic. Work in holiday or Sunday will be paid twice from premium basic. As for processing worker in mill, overtime is paid through premium payment. PPE is provided by company. Company provided source of clean water, houses, education, health, and other facilities to guarantee worker welfare. 	<p>Auditor has verified related to worker welfare and OSH implementation aspects towards criterion 4.7, 6.5, 6.7, 6.8, 6.9.</p> <p>However, there are some nonconformity about overtime payment, child labor, and OSH implementation and becomes Non Conformity No. 2019. 01, 2019. 4, 2019. 5, 2019. 6.</p>
<p>Women Empowerment Division (Gender Committee)</p> <ul style="list-style-type: none"> Women worker usually work as pesticide operator, fertilizer application worker, and administration. Company provides women worker with reproductive rights, such as menstrual leave for about 2 days, maternity leaves for about 3 months, breastfeeding break time. There is no complaint about sexual harassment. Company provides crèche in every afdeling. Women empowerment has socialized about mechanism of complaint to worker, especially women worker. 	<p>Auditor has verified related to reproductive rights for woman worker aspects towards criterion 6.9.</p>
<p>Environment Agency of Labuhanbatu Utara</p> <ul style="list-style-type: none"> PTPN IV Berangir Unit has consider cooperative in term of obligation report delivery ontime, such as quarterly liquid waste report, semester environment management and monitoring plan report (RKL/RPL), land application report and quarterly hazardous waste report. Permit of hazardous waste warehouse and land application are reported still valid. Progress of online reporting towards hazardous waste management is still ongoing on socialization stage which conducted by Environment Agency of Sumatera Utara. PTPN IV Berangir Unit has good relationship and satisfactory communicate all environment issues to the Agency. There is no change of FFB process capacity, which is 30 ton FFB/hour. 	<p>All comments given indicates positive response of company operational activities towards environment management aspect, as mentioned in Criteria 4.4; 4.6; 5.1; 5.2 and 5.3.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> Reparation of WWTP pond border to be continued. 	
Manpower and Industrial Agency of Labuhanbatu Utara <ul style="list-style-type: none"> The company has a Board Committee of Occupational Safety and Health (P2K3) board authorized by the Manpower Agency Province. The company has combined the OHS committee of estates and mill. The company is consider cooperative and satisfactory fulfill administrative obligation report, such as Semester WLTK, Semester P2K3, quarter work accident report, etc. BPJS of Manpower and Health has applied for all worker. There is no issues on foreign worker, child labor abuse, employee dispute, discrimination and other negative issues related to manpower aspects. It was reported that PTPN IV Berangir has Collective Labor Agreement (PKB) and Cooperation Institution of Bipartite (LKS Bipartite) which valid until December 2018. The company has Plantation Worker Union (SPBun). Every revision of committee members has informed to the Agency. The company has license of processing machineries such as Boiler, generator set, electrical installation, etc. Companies has consider cooperative in terms of providing information which requested by the Agency. Not more that 3 days for providing data requested. There is no negative issues related to tribes, religion, races and community groups. Estate is expected to improve and proactive towards coordination and communication with the Agency. 	<p>All comments given indicates positive response of company operational activities towards environment management aspect, as mentioned in Criteria 4.7; 6.1; 6.2; 6.5; 6.6; 6.7 6.8 6.9 6.12 and 6.13</p>
Agriculture Agency of Labuhanbatu Utara <ul style="list-style-type: none"> The latest PUP has been implemented, the certificate is still awaiting approval from the regent Reporting of plantation business progress (LPUP) has delivered on January 2019. There is no additional and/or revision on Location Permit, plantation business permit (IUP) and land use right or land title (HGU) in PTPN IV Berangir Unit. The company has involved local communities in annual CSR program meeting, several program area which already carried out are development of mosque, church, roads and transaction with locals communities. The Agency stated that there is no more indigenous people (tribes) around Berangir POM and Estate operational areas. Current community has already diversify (Malay, Javanese, Batak, Bugis, etc.). There is no overlap with forest and/or customary forest areas. 	<p>All comments given indicates positive response of company operational activities towards local, national and ratified international laws and regulations aspect, as mentioned in Criteria 2.2; 2.3 and 6.4.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> • There has been no conflict related to land dispute with local communities. • There is no issues or reports from Local and National NGO related to fire incidence in PTPN IV Berangir Business Unit. Company facility on fire incidence prevention has considered satisfactory. 	

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY
4.1	Formal Sign-off of Assessment Findings
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;"> <p>PT Perkebunan Nusantara IV, Berangir Unit Vice President Strategic Planning</p>  <p><u>Khayamuddin Panjaitan</u> Monday, 09 September 2019</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><u>Leonada</u> Monday, 09 September 2019</p> </div> </div>

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

No	Institution/NGO/Community	Address	Phone/Email	Form of Communication	Date of Contact	Response	
						Yes	No
1	Environment Agency of Labuhanbatu Utara	District Labuhanbatu Utara Province North Sumatera	-	Interview	18 June 2019	√	
2	Manpower and Industrial Agency of Labuhanbatu Utara	District Labuhanbatu Utara Province North Sumatera	-	Interview	18 June 2019	√	
3	Agriculture Agency of Labuhanbatu Utara	District Labuhanbatu Utara Province North Sumatera	-	Interview	18 June 2019	√	
4	Consultation to BPN of Labuhan Batu District	District Labuhanbatu Utara Province North Sumatera	-	Interview	19 June 2019		√
5	Sei Raja Village	District of North Labuhan Batu	-	Interview	18 June 2019	√	
6	Simpang Merbau Village	District of North Labuhan Batu	-	Interview	18 June 2019	√	
7	Previous Land Owner of Sei Raja Village (10 sampel from 133 persons according to compensation documents) <i>*Only 1 sampel can be met, because the other have passed away/moved out</i>	District of North Labuhan Batu	-	Interview	18 June 2019	√	
8	CV Dapa Bersama	District Labuhanbatu Utara Province North Sumatera	-	Interview	18 June 2019	√	
9	CV GAS	District Labuhanbatu Utara Province North Sumatera	-	Interview	18 June 2019	√	
10	SPBUN (Worker Union)	Village of Perkebunan Berangir, Sub District NA IX - X, District Labuhanbatu Utara Province North Sumatera	-	Interview	18 June 2019	√	
11	Gender committee	Village of Perkebunan Berangir, Sub District NA IX - X, District Labuhanbatu Utara Province North Sumatera	-	Interview	18 June 2019	√	
12	Berangir Estate	Berangir Estate, District	-	Interview	19 June	√	

	<ul style="list-style-type: none"> - Spraying: 3 pesticide applicator - Manuring: 9 fertilizer loader - Harvesting: 5 workers - Manual weeding: 9 worker - EFB application: 4 worker 	Labuhanbatu Utara Province North Sumatera			2019		
13	Berangir POM <ul style="list-style-type: none"> - Security: 2 Security - Loading ramp: 2 workers - Sterillizer station: 1 worker - Press station: 1 worker - Boiler station: 3 worker - Engine room: 1 worker - Kernel station: 1 worker - WWTP: 1 worker - WTP: 1 worker - Workshop: 2 workers - Chemical storage: 1 operator - Hazardous waste storage: 1 worker 	Berangir POM,	-	Interview	18 June 2019	√	
14	Sawit watch	Bogor, Indonesia	info@sawitwatch.or.id	Email			√
15	WWF	Jakarta, Indonesia	wwf-indonesia@wwf.or.id	Email			√
16	WALHI	Jakarta, Indonesia	informasi@walhi.or.id	Email			√
17	AMAN	Jakarta, Indonesia	rumahaman@cbn.net.id	Email			√

Appendix 2. Assessment Program

DATE	17 – 21 June 2019	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 17 June 2019		
05.35 – 08.00	Jakarta → Kuala Namu	All Auditor
08.00 – 15.00	Kuala Namu → Site (PTPN IV – Berangir)	
15.00 – 16.00	Opening meeting <ul style="list-style-type: none">Auditee Speech (Introduction of PIC, Profile of Certified Management Unit)Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample,Transparency and Confidentiality Clarification)	
16.00 – 17.00	Documents Review <ul style="list-style-type: none">Review of previous assessment findingsVerification of Basic Information Mill and EstateConfirmation of Time Bound PlanReview of Partial CertificationVerification of P n C documents	
Tuesday, 18 June 2019		
08.00 – 09.00	Stakeholders consultation to related agencies	BYG
	Stakeholder consultation to affected communities surrounding the plantations, indigenous peoples, local communities and previous land owners.	LEO
	Interview with Gender Committee, Worker’s Union, , Worker’s Cooperative (if any), Local Contractor (for Mill and Estate), Smallholders, Third Party Supplier (if any), local NGO (if any)	HSS/AAS
12.00 – 14.00	Break	
14.00 – 17.00	Field observation to Berangir Mill : <ul style="list-style-type: none">Supply Chain verification (FFB Receiving, Weighbridge),Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect, security post, FFB Sorting, Processing Activity, Despatch CPO)Implementation of Environmental aspect, Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, POME Pond & land application	LEO HSS/AAS BYG
Wednesday, 19 June 2019		

DATE	17 – 21 June 2019	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
08.00 – 12.00	Field Observation to Berangir Estate Aspect to be verified : <ul style="list-style-type: none"> - Implementation of Legal Aspect (Land Ownership, Legal Boundaries), HCV area. - Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect - Implementation of Environmental, and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management), Observation of Workers Facilities (Housing, School, Worship Place). 	LEO HSS/AAS BYG
12.00 – 14.00	Break	
14.00 – 17.00	<input type="checkbox"/> Continue Field Observation and field observation clarification <input type="checkbox"/> Verification of documents and completing checklist	All Auditor
Thursday, 20 June 2019		
08.00 – 10.00	<input type="checkbox"/> Continue Field Observation and field observation clarification <input type="checkbox"/> Verification of documents and completing checklist	
10.00 – 12.00	Interim Meeting (closing meeting preparation)	
12.00 – 14.00	Break	
14.00 – 15.00	Interim Meeting (closing meeting preparation)	
15.00 – 17.00	Closing Meeting	All Auditor
Friday, 21 June 2019		
06.00 – 13.00	Site PTPN IV – Berangir → Kuala Namu	
14.05 – 16.00	Kuala Namu → Jakarta	All Auditor