

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

### **[✓] Surveillance**

Name of Management : AMP POM - PT AMP Plantation, subsidiary of Wilmar International Ltd  
 Organisation  
 Plantation Name : PT AMP Plantation (AMP-1 Estate; AMP 2 Estate; AMP 3 Estate; AMP 4 Estate)  
 Scheme Smallholders of PT AMP Plantation (KUD Tompek Tapian Kandis;  
 KUD Bukit Sandiang Tigo; KUD Agro Wira Masang; KUD Mutiara Sawit Jaya)  
 PT Primatama Mulia Jaya (PMJ Estate)  
 Location : Tapian Kandis Village, Palembang Sub-District, Agam Regency, Sumatera  
 Barat Province, Indonesia  
 Certificate Code : MUTU-RSPO/096  
 Date of Initial Registration : 07 June 2012  
 Date of Last Issued : 21 August 2017      Date of License Issue : 21 November 2019  
 Date of Certificate Expiry : 06 June 2022      Date of License Expiry : 06 June 2020

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-1.2	06 to 11 May 2019	Andi Pratama Pasaribu (Lead Auditor), Mohamad Amarullah, Rindu Galih Rezsa Rachmansyah and Steve Mualim	Ardiansyah	Octo H.P.N. Nainggolan

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-1.2	13 September 2019

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 on March 12<sup>th</sup>, 2014 with registration number **ASI-ACC-055**

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Figure 1. Location Map of PT AMP Plantation



Figure 2. Location Map of PT Primatama Mulia Jaya

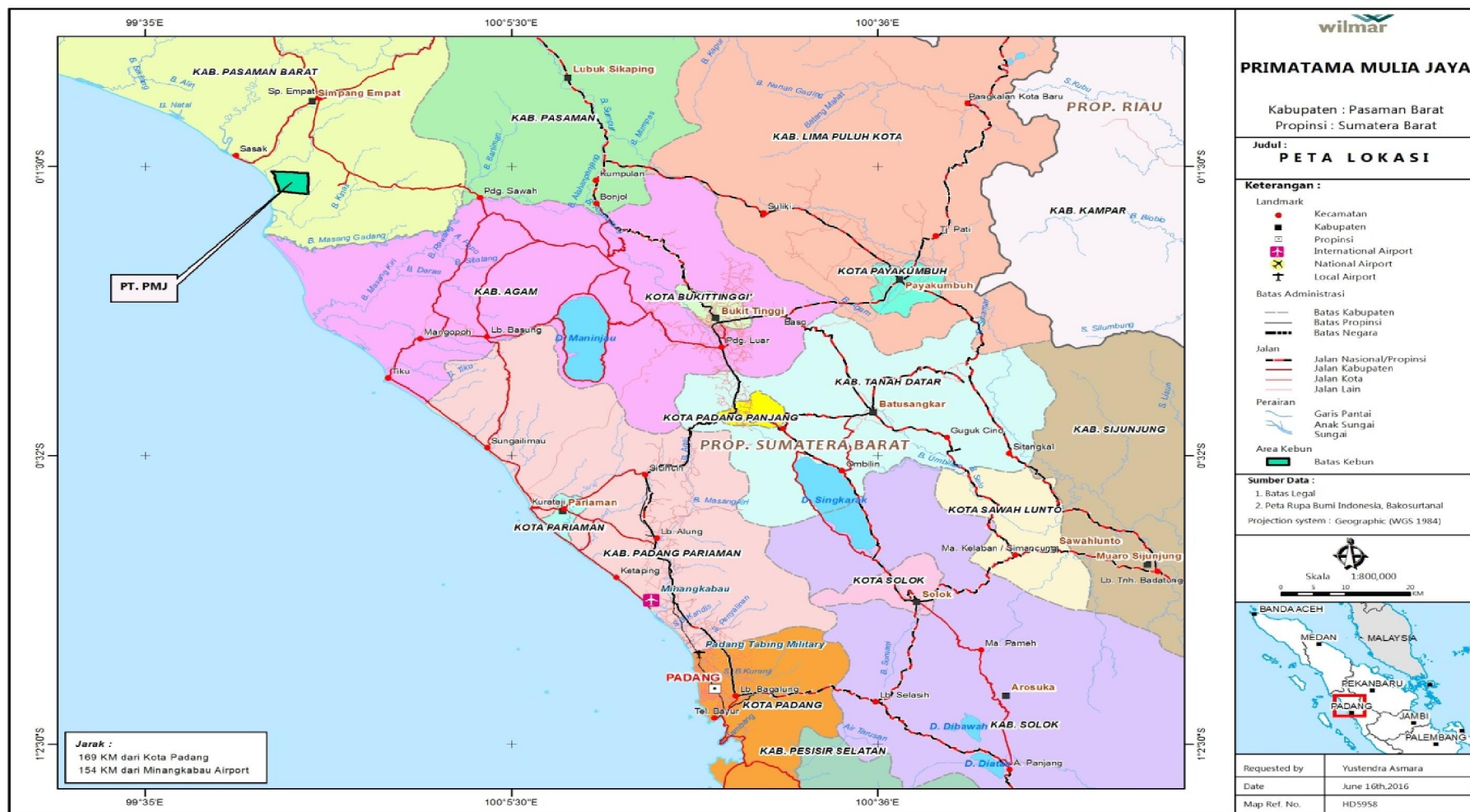




Figure 3. Operational Map of PT AMP Plantation

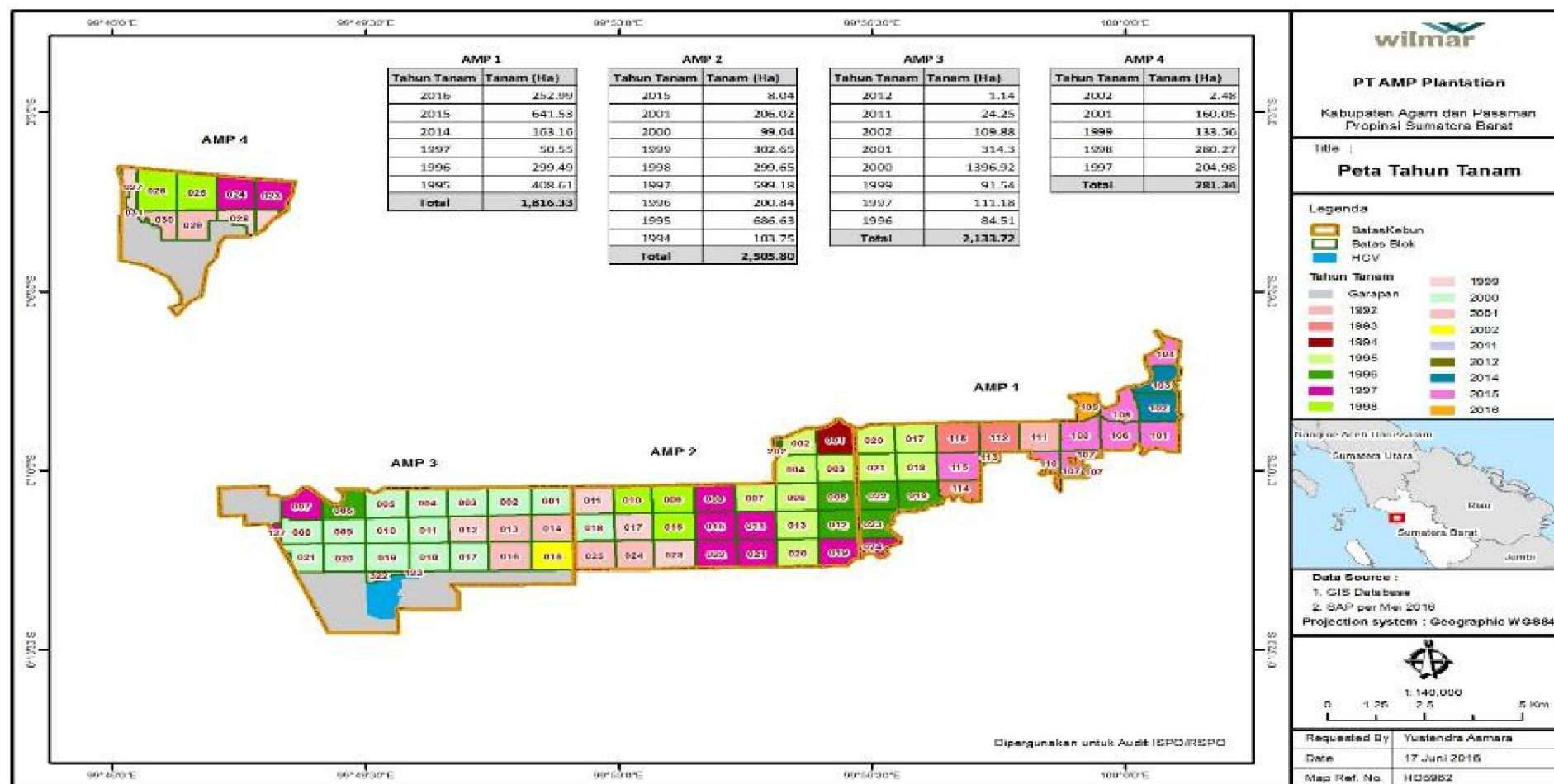


Figure 4. Operational Map of PT Primatama Mulia Jaya

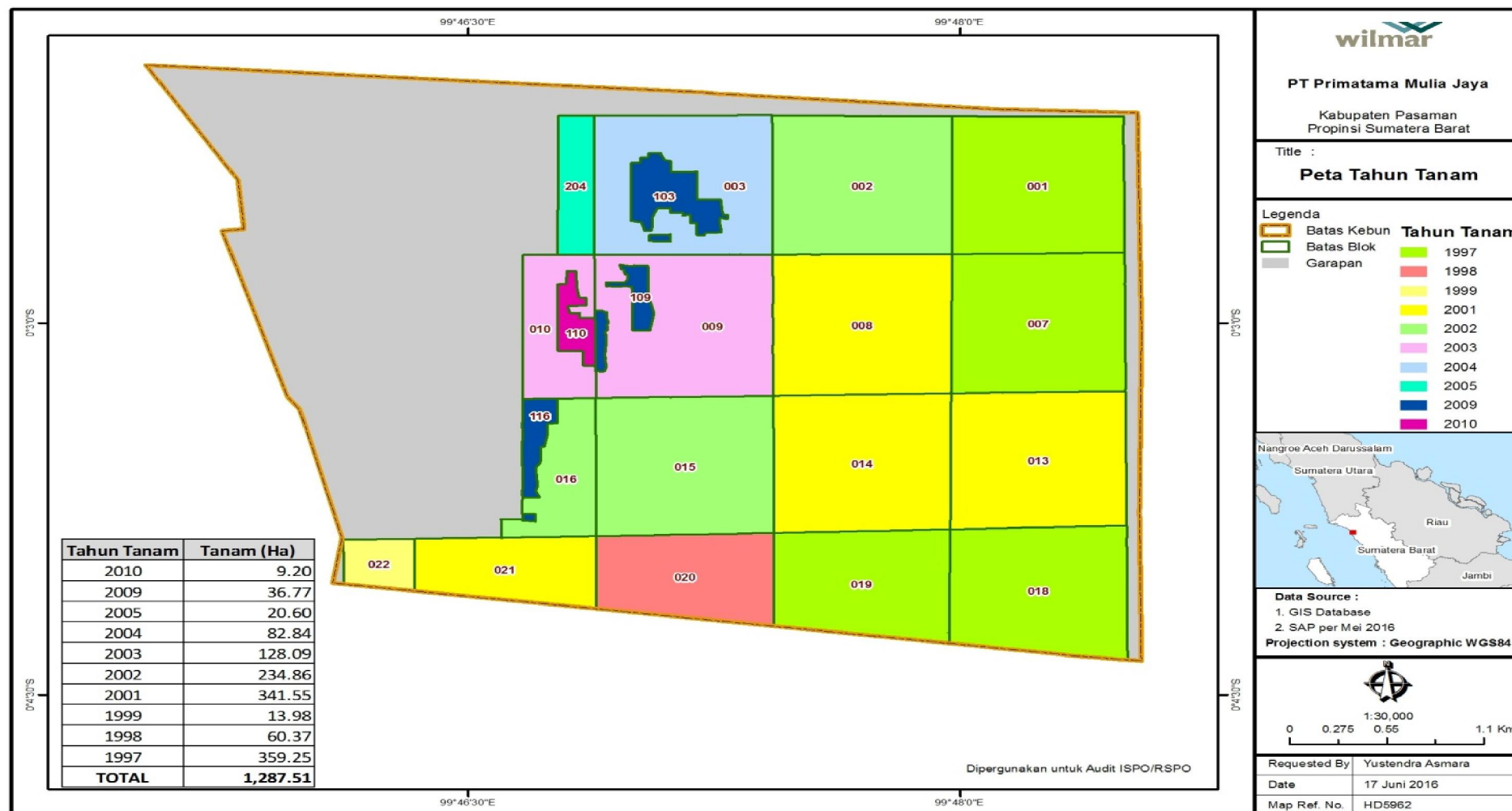


Figure 5. Operational Map of KPS Bukit Sanding Tigo



Figure 6. Operational Map of KPS Tompek Tapian Kandis

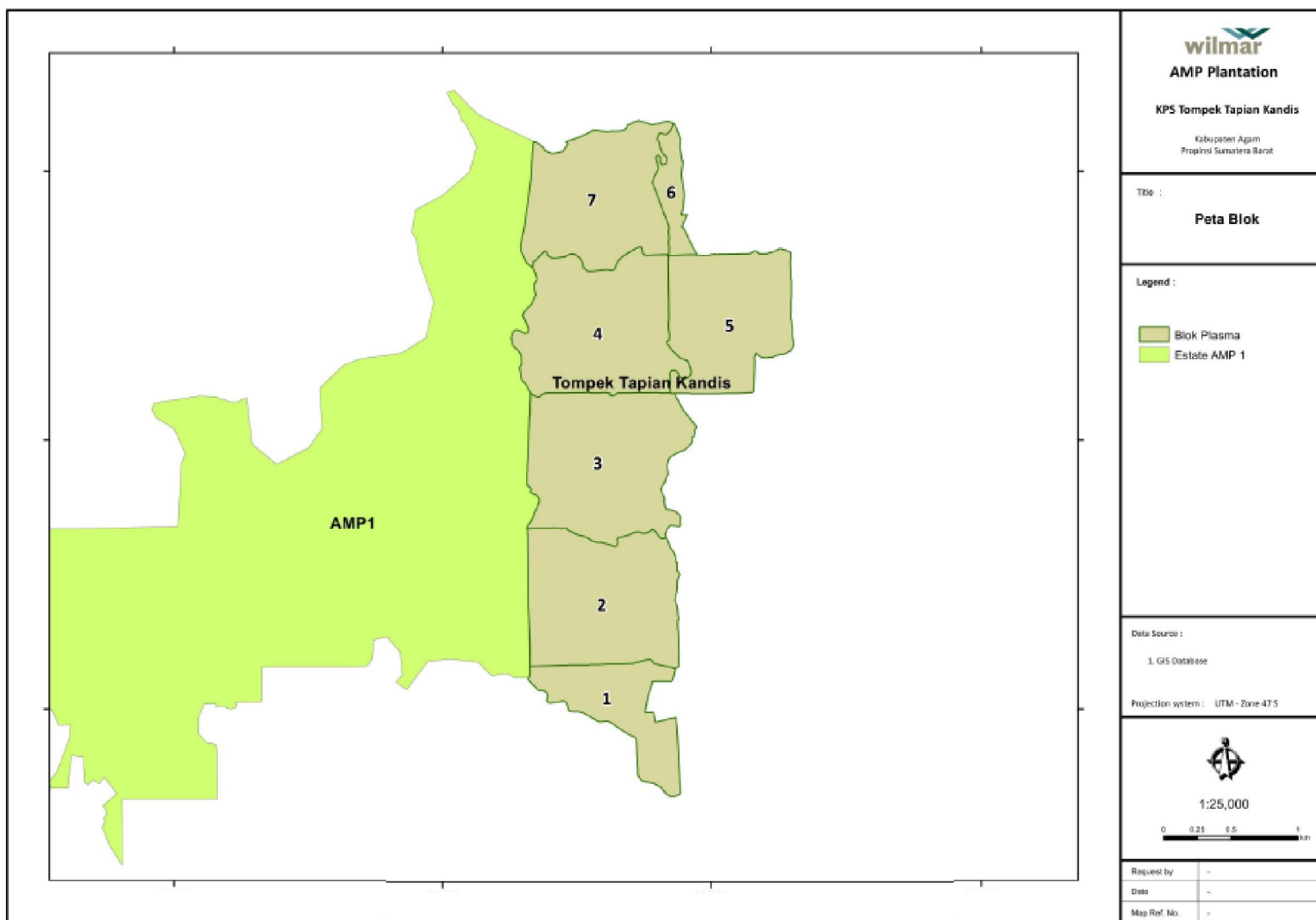




Figure 7. Operational Map of KUD Agro Wira Masang

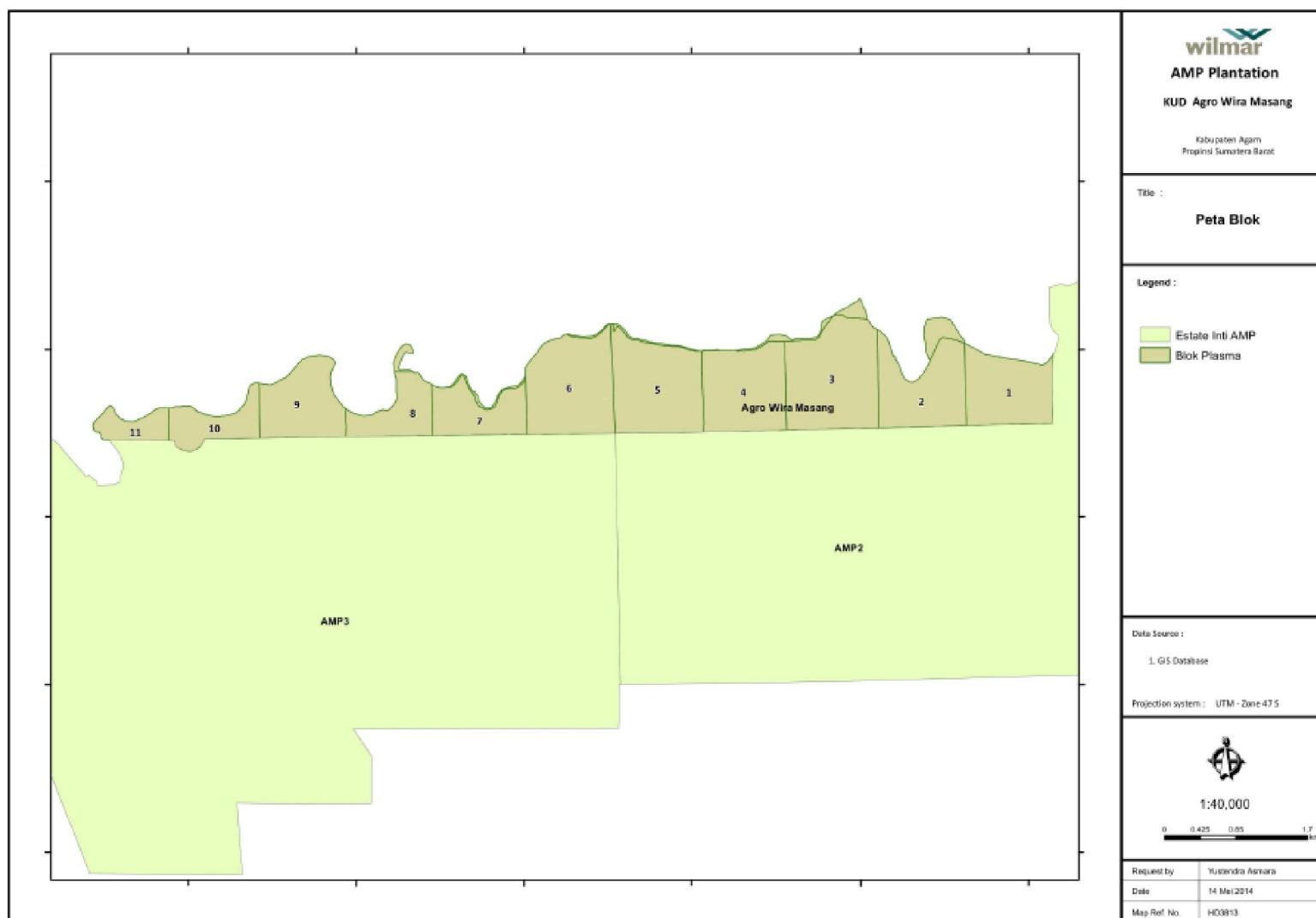
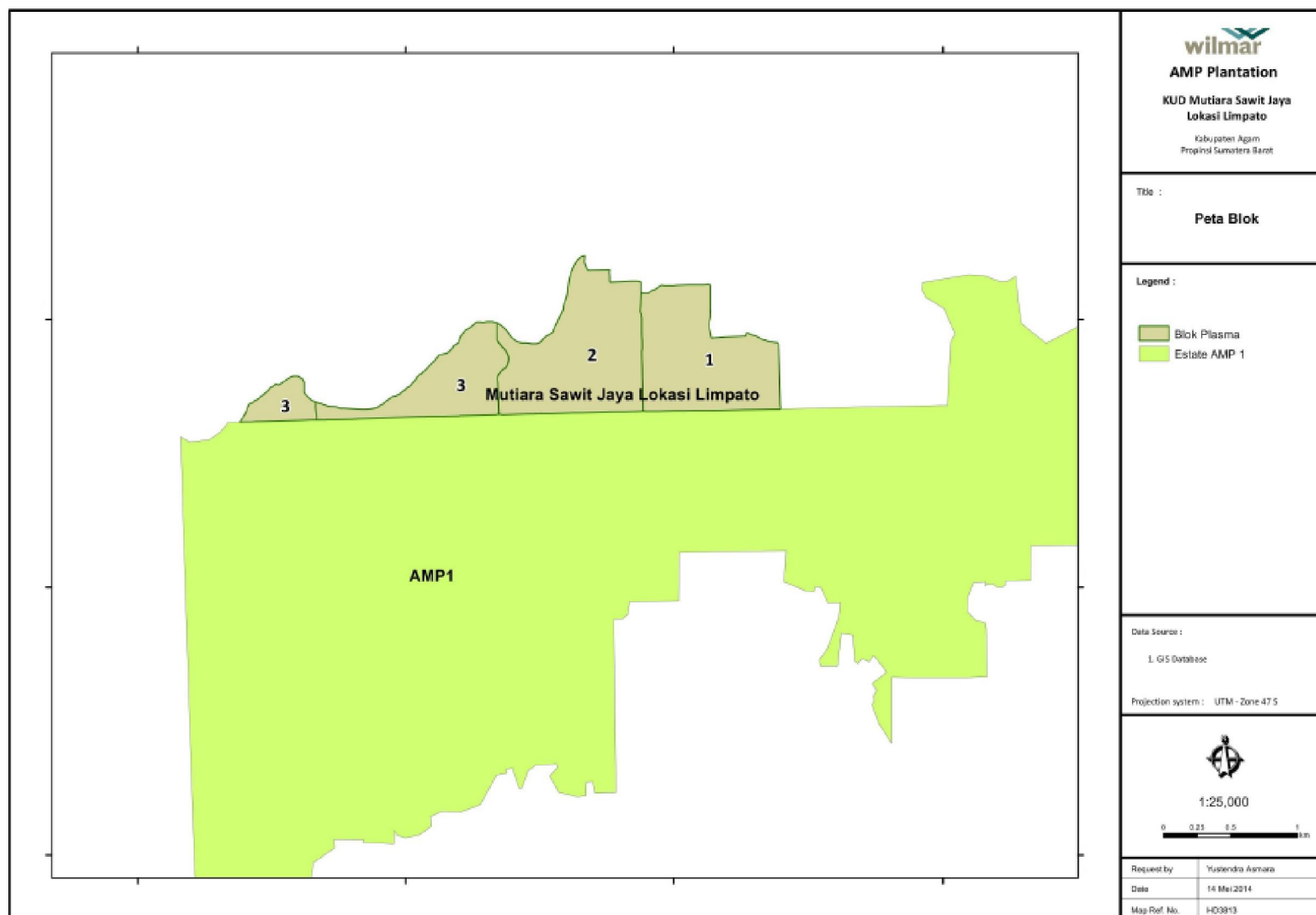


Figure 8. Operational Map of KUD Mutiara Sawit Jaya



**Abbreviations Used**

AMP-1	:	AMP-1 Estate
AMP-2	:	AMP-2 Estate
AMP-3	:	AMP-3 Estate
AMP-4	:	AMP-4 Estate
ASA	:	Annual Surveillance Assessment
AWM	:	Agro Wira Masang (Associated Smallholders of AMP Plantations)
BMS	:	Block Manuring System
BPN	:	<i>Badan Pertanahan Nasional</i> (National Land Agency)
BSS	:	Block Spraying System
BST	:	Bukit Sanding Tigo (Associated Smallholder of AMP)
CB	:	Certification Body
CH	:	Certificate Holder
CPO	:	Crude Palm Oil
CR	:	Collection Road
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm Oil
CSR	:	Corporate Social Responsibility
EFB	:	Empty Fruit Bunch
EHS	:	Environment Health and Safety
EWS	:	Early Warning System
ENT	:	Ear Nose Throat
FFB	:	Fresh Fruit Bunch
GAPKI	:	<i>Gabungan Pengusaha Kelapa sawit Indonesia</i>
GEM	:	General Estate Manager
GHG	:	Greenhouse Gasses
GM	:	General Manager
HCV	:	High Conservation Value
HGB	:	<i>Hak Guna Bangunan</i> (Land Use Title for Building)
HGU	:	<i>Hak Guna Usaha</i> (Land Use Title/Right)
HRGA	:	Human Resources General Administration
IPM	:	Integrated Pest Management
ISCC	:	International Sustainability & Carbon Certification
ISPO	:	Indonesian Sustainability Palm Oil
KAMU	:	Karya Agung Megah Utama
KMSI	:	<i>Komisi Minyak Sawit Indonesia</i>
KUD	:	<i>Koperasi Unit Desa</i>
LA	:	Land Application
MR	:	Main Road
MSDS	:	Material Safety Data Sheet
MSJ	:	Mutiara Sawit Jaya
NGO	:	Non-Government Organization
OHS / OSH	:	Occupational Health and Safety
P&D	:	Pest & Disease
P2K3	:	<i>Panitia Pembina Keselamatan dan Kesehatan Kerja</i> (OHS Committee)
PANP	:	Perkebunan Anak Negeri Pasaman
PHP	:	Permata Hijau Pasaman -1
PIC	:	Person In Charge
PMJ	:	Primatama Mulia Jaya
POM	:	Palm Oil Mill

POME	:	Palm Oil Mill Effluent
PPE	:	Personal Protective Equipment
PTUN	:	<i>Pengadilan Tata Usaha Negeri</i> (Government Administration Court)
RKL/RPL	:	<i>Rencana Kelola Lingkungan/ Rencana Pemantauan Lingkungan</i> (Environmental Management Plan / Environmental Monitoring Plan)
RTE	:	Rare threatened and Endangered
SCCS	:	Supply Chain Certification System
SEIA	:	Social Environment Impact Assessment
SHM	:	<i>Sertifikat Hak Milik</i> (Ownership Right)
SIA	:	Social Impact Assessment
SUMBAR	:	Sumatera Barat
SOP	:	Standard Operation Procedure
SPS	:	Siak Prima Sakti
SPSI	:	Serikat Pekerja Seluruh Indonesia
TTK	:	Tompek Tapian Kandis
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"><li>Indonesian National Interpretation of RSPO Principles and Criteria 2013 by INA-NITF, July 2016 (Endorsed by the RSPO Board of Governors meeting on 30 September 2016)</li><li>RSPO Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014 revised on 14 June 2017 (Module D / E for CPO Mill)</li><li>RSPO Certification System for Principles and Criteria, June 2017</li></ul>	
1.2	Organisation Information		
1.2.1	Organisation name listed in the certificate	PT AMP PLANTATION, subsidiary of Wilmar International Ltd	
1.2.2	Contact person	Perpetua George	
1.2.3	Organisation address and site address	<b>Register Company:</b> 56 Neil Road, Singapore – Postal Code 088830  <b>Indonesia Liason Office:</b> Multivision Tower 15rd floor, Jl.Kuningan Mulia Kav.9B, Jakarta Selatan, Indonesia	
1.2.4	Telephone	(62-21) 461 6555	
1.2.5	Fax	(62-21) 461 6687	
1.2.6	E-mail	<a href="mailto:perpetua.george@wilmar.com.sg">perpetua.george@wilmar.com.sg</a>	
1.2.7	Web page address	<a href="http://www.wilmar.co.id">www.wilmar.co.id</a>	
1.2.8	Management Representative who completed the application for certification	Perpetua George (Sustainability Coordinator)	
1.2.9	Registered as RSPO member	2-0017-05-000-00 16 August 2005	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Estates: AMP-1, AMP-2, AMP-3, AMP-4, PT Primatama Mulia Jaya (PMJ Estate),  Smallholders Cooperatives (full manage by PT AMP) Tompek Tapiah Kandis, Mutiara Sawit Jaya, Bukit Sandiang Tigo, Agro Wira Masang.  Reduction of scope: PT Perkebunan Anak Negeri Pasaman (PANP Estate) and PT Karya Agung Megah Utama (KAMU 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



	AMP POM	Tapian Kandis Village, Palembayan Sub-District, Agam Regency, West Sumatera Province, Indonesia	S 00° 09' 22"	E 100° 01' 40"
1.4.2	Location of Certification Scope of Supply Base			
	Name of Supply Base	Location	Coordinate	
			Latitude	Longitude
	AMP 1	Tapian Kandis Village, Palembayan Sub-District, Agam District, Sumatera Barat Province, Indonesia	S 00° 08' 23"	E 100° 00' 28"
	AMP 2	Tapian Kandis Village, Palembayan Sub-District, Agam District, Sumatera Barat Province, Indonesia	S 00° 09' 30"	E 99° 55' 13"
	AMP 3	Tapian Kandis Village, Palembayan Sub-District, Agam District, Sumatera Barat Province, Indonesia	S 00° 10' 48"	E 99° 49' 06"
	AMP 4	Village of Ampat Koto, Sub-District of Kinali, Pasaman Barat District, Sumatera Barat Province, Indonesia	S 00° 04' 23"	E 99° 48' 10"
	PT. PMJ	Jorong IV Koto Kenagarian Kinali, Sub-district of Kinali, Pasaman Barat District, Sumatera Barat Province, Indonesia	S 00° 03' 17"	E 99° 47' 51"
	Cooperative of Tompek Tapian Kandis	Tepian Kandır village, Palembayan Sub District, Agam District, Sumatera Barat Province, Indonesia	S 00° 08' 20"	E 100° 01' 00"
	Cooperative of Mutiara Sawit Jaya	Taratak Nan Tigo Tiku village, Tanjung Mutiara Sub District, Agam District, Sumatera Barat Province, Indonesia	S 00° 08' 42"	E 99° 58' 32"
	Cooperative of Bukit Sandiang Tigo	Bawan village, Ampek Nagari Sub District, Agam District, Sumatera Barat Province, Indonesia	S 00° 10' 25"	E 99° 59' 29"
Cooperative of Agro Wira Masang	Kinali village, Kinali Sub District, Pasaman Barat District, Sumatera Barat Province, Indonesia	S 00° 10' 02"	E 99° 52' 58"	
1.5	Description of Area Statement			
1.5.1	Tenure			
	• State (HGU)		11,188,52 Ha	
	• Community *)		1,858 Ha	
	Total		13,046.30 Ha	
	*) The difference in area statement and land use title (0.22 ha) due to a joint re-measurement between PT AMP and Management of KUD TTK on 14 May 2011.			
1.5.2	Area Statement	Own Estate (AMP 1, AMP 2, AMP 3, AMP 4, PMJ)	Plasma (TTK, MSJ, AWM, BST)	Total
	• Total area	11,188,52	1,857.78	13,046.30
	• Mature Area	7,528.18	1,782.37	9,310.55
	• Immature Area	1,135.51	-	1,135.51
	• Mill	22.09	-	22.09
	• LC	11.08	15.63	26.71
	• Nursery	11.91	-	11.90
	• Infrastructure	282.85	59.78	342.63

• <b>Unplanted</b>	60.24	-	60.24
• <b>Occupation</b>	1,916.14	-	1,916.14
• <b>HCV</b>	220.51	-	220.51

\*The difference in area statement and land use title (0.22 ha) due to a joint re-measurement between PT AMP and Management of KUD TTK on 14 May 2011.

**1.6 Planting Year and Cycles**
**1.6.1 Age profile of planting year**

Planting Year	Hectarage (Ha)									
	AMP-1	AMP-2	AMP-3	AMP-4	PMJ	MSJ	BST	TTK	AWM	Total
1992	-	-	-	-	-	-	-	86.22	-	86.22
1993	-	-	-	-	-	75.64	73.63	52.49	-	201.76
1994	-	-	-	-	-	142.61	96.07	92.58	-	331.26
1995	-	413.63	-	-	-	-	25.96	17.27	-	456.86
1996	-	189.76	84.51	-	-	-	22.87	65.14	646.38	1,008.66
1997	-	599.18	110.98	204.98	359.25	-	-	105.96	110.70	1,491.05
1998	-	299.65	-	280.27	60.37	-	-	66.25	-	706.54
1999	-	302.65	91.54	133.56	13.98	-	-	-	-	541.73
2000	-	99.04	1,410.53	-	-	-	-	-	-	1,509.57
2001	-	206.02	314.3	160.05	341.55	-	-	-	-	1,021.92
2002	-	-	55.07	2.48	234.86	-	-	-	-	292.41
2003	-	-	-	-	128.09	-	-	-	-	128.09
2004	-	-	-	-	82.84	-	-	-	-	82.84
2005	-	-	-	-	20.60	-	-	-	-	20.60
2009	-	-	-	-	36.77	-	-	-	-	36.77
2010	-	-	-	-	9.20	-	-	-	-	9.20
2011	-	-	24.25	-	-	-	-	-	102.60	126.85
2012	-	-	1.14	-	-	-	-	-	-	1.14
2014	163.89	-	-	-	-	-	-	-	-	163.89
2015	637.94	8.04	-	-	-	-	-	-	-	645.98
2016	447.21	-	-	-	-	-	-	-	-	447.21
<b>Sub Total Mature</b>	<b>1,249.04</b>	<b>2,117.97</b>	<b>2,092.32</b>	<b>781.34</b>	<b>1,287.51</b>	<b>218.25</b>	<b>218.53</b>	<b>485.91</b>	<b>859.68</b>	<b>9,310.55</b>
2018	758.76	376.75	-	-	-	-	-	-	-	1,135.51
<b>Sub Total Immature</b>	<b>758.76</b>	<b>376.75</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>1,135.51</b>
<b>TOTAL</b>	<b>2,007.80</b>	<b>2,494.72</b>	<b>2,092.32</b>	<b>781.34</b>	<b>1,287.51</b>	<b>218.25</b>	<b>218.53</b>	<b>485.91</b>	<b>859.68</b>	<b>10,446.06</b>

**1.6.2 New Planting area after January 2010**

- Ha

**1.6.3 Planting Cycle**

2<sup>nd</sup> Cycle

**1.7 Description of Mill and Supply Base**
**1.7.1 Description of Mill**

Name of Mill	Capacity	FFB Processed	CPO	Palm Kernel
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		(tonnes/ hour)	(tonnes/year)	Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)
	AMP	80	412,781.06	73,579.00	17.82	21,748.73	5.27
	* Production data source from May 2018 until April 2019						
1.7.2	Description of Certification Scope of Supply Base						
	Name of Estate	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ ha/year)	Supplied to Mill	
						FFB (tonnes/year)	%
	AMP 1	2,128.32	2,007.80	17,516.68	14.02	17,516.68	100
	AMP 2	2,595.08	2494.72	45,083.70	21.29	45,083.70	100
	AMP 3	3,225.11	2,092.32	35,649.44	17.04	35,649.44	100
	AMP 4	1,300.00	781.34	20,912.77	26.77	20,912.77	100
	PMJ	1,940.00	1,287.51	33,850.94	26.29	33,850.94	100
	PANP	2,036.23	977.65	3,242.31	3.32	3,242.31	100
	KAMU	1,250.00	871.55	1,543.18	2.62	1,543.18	100
	MSJ (110 SH)	220.00	218.25	4,247.25	19.46	4,247.25	100
	BST (113 SH)	226.00	218.53	3,003.17	13.74	3,003.17	100
	TTK (256 SH)	511.78	485.91	5,615.16	11.56	5,615.16	100
	AWM (450 SH)	900.00	859.68	14,351.40	16.69	14,351.40	100
		TOTAL	16,332.52	12,295.26	185,016.00	17.01	185,016.00
	* Production data source from May 2018 until April 2019						
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)		
	PHP 1 (certified)	Subsidiary of Wilmar International Ltd.	-	1,190.84	1,226.04		
	PANP BT BIYU& SHM	Outgrower	-	137	34.85		
	KUD MG1 - PLS 2	Wimar Smallholder	9 7	250.55	2,220.50		
	KUD MG2	Wimar Smallholder	73 6	1,187.45	6,001.77		
	KUD PLS YTM	Wimar Smallholder	9	19.16	105.48		
	AMP III PLASMA ( KUD LS )	Wimar Smallholder	30 0	338.49	1,314.56		
	PMJ PLASMA ( DASTRA I)	Wimar Smallholder	84 0	1,303.46	10,595.00		
	AMP III PLASMA (DASTRA II)	Wimar Smallholder	24 0	209.38	16.13		
	PHP I /PLS Sasak	Wimar Smallholder	58 4	1,132.11	251.00		

GMP/PLS Bina tani Sejahtera & Lingkung Aur II	Wimar Smallholder	1,039	2,030.23	115.22
SPS ADE_S	Independent Supplier	-	-	88,306.65
APS ADIS				13.01
SPS MI				3,413.06
SPS NETTY/SPS TB				665.39
SPS REZ_KY				49.71
SPS RONALD				963.26
SPS CESSYA				20,565.06
SPS INNEKA				4,150.00
SPS RSL				15.87
SPS OSBA				32,782.43
AMP ADITIYAWARMAN				7,861.76
AMP ADE SUASMAN				34,616.16
AMP MI				2,039.21
AMP MA				40.80
AMP OSBA				10,152.67
AMP RSL				8.16
AMP TB				241.30
TOTAL				227,765.06

\* Production data source from May 2018 until April 2019

1.7.4 Product categories **FFB, CPO, PK**

1.8	Tonnage of Product				
1.8.1	Past Annual Claim Certified Product		Previous Certificate Claim (tonnes/year)	Actual certified product May 2018 to April 2019 (tonnes/year)	
	• FFB Production		198,000	179,524	
	• CPO Production		38,610	29,054	
	• Palm Kernel (PK) Production		10,395	9,854	
1.8.2	Product selling				
	Tonnage of selling product		Period of actual selling product May 2018 to April 2019		
	• CSPO sold as RSPO certified product		0		
	• CSPK sold as RSPO certified product		9,726		
	• CSPO sold under other scheme		28,981		
	• CSPK sold under other scheme		0		
	• CSPO sold as conventional		0		
	• CSPK sold as conventional		0		
1.8.3	Estimate of Certified FFB Claim				
	Name of Estates	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)
	AMP 1	2,128.32	2,007.80	18,750	15.01
	AMP 2	2,595.08	2494.72	48,250	22.78
	AMP 3	3,225.11	2,092.32	38,150	18.23

AMP 4	1,300.00	781.34	22,400	28.64
PMJ	1,940.00	1,287.51	36,250	28.13
MSJ (110 SH)	220.00	218.25	4,600	20.20
BST (113 SH)	226.00	218.53	3,250	14.00
TTK (256 SH)	511.78	485.91	6,050	12.36
AWM (450 SH)	900.00	859.68	15,500	17.86
<b>TOTAL</b>	<b>13,046.29</b>	<b>10,446.06</b>	<b>193,200</b>	<b>19.69</b>

*\*Estimate production data for 07 June 2019 to 06 June 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 (%)	
AMP	80	193,200	34,800	18.00	9,700	5.00	MB

*\*Estimate production data for 07 June 2019 to 06 June 2020*

#### 1.9 Other Certifications

ISO 9001:2008	-
ISO 14001: 2004	-
OHSAS 18001:2007	-
ISCC	AMP; PMJ; KAMU; PANP; Plasma EU-ISCC-Cert-ID218-20180035
Others	PT AMP Plantation (ISPO Sertifikat No. MUTU-ISPO/022)

#### 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				
Sapi (1 + 2)	2008	Sapi 1 & 2, Kiabau	2008	Sandakan, Sabah, Malaysia	Certified
Sabahmas	2008	Sabahmas	2008	Lahad Datu, Sabah, Malaysia	Certified
Reka Halus	2008	Reka Halus	2008	Sandakan, Sabah, Malaysia	Certified
Saremas 1	2008	Saremas 1, Saremas 2 (Div D), Suai	2008	Miri Serawak, Malaysia	Certified
Saremas 2	2008	Saremas 2 (exclude Div D), Kaminsky, Segarmas	2008	Miri Serawak, Malaysia	Certified
Terusan (1 + 2)	2009	Terusan 1 & 2, Rumidi	2009	Sandakan, Sabah, Malaysia	Certified
Ribubonus	2009	Ribubonus	2009	Sandakan, Sabah, Malaysia	Certified
PT Perkebunan Milano	2009	Sei Daun, Batang Saponggol, Marbau	2009	North Sumatra	Certified
PT Mustika Sembuluh 1	2009	Mustika Sembuluh 1, Mustika Sembuluh 2, Kerry Sawit Indonesia 1, Sarana Titian Permata 1, Sarana Titian	2010	Central Kalimantan	Certified



		Permata 2, , KUD Bitu Maju Bersama			
PT Mustika Sembuluh 2	2015	Mustika Sembuluh 1, Mustika Sembuluh 3, Bumi Sawit Kencana 1	2015	Central Kalimantan	Certified
PT Kencana Sawit Indonesia	2010	Kencana Sawit Indonesia, Koperasi Swamata	2010	West Sumatra.	Certified
PT. Kerry Sawit Indonesia 1	2010	Kerry Sawit Indonesia 2, Kerry Sawit Indonesia 3	2011	Central Kalimantan	Certified
		KUD Sejahtera Bersama, KUD Kosudra	2020	Central Kalimantan	Un-Certified (Final Audit has conducted but failed result so re-audit)
PT. Kerry Sawit Indonesia 2	2015	Kerry Sawit Indonesia 1, Kerry Sawit Indonesia 2, Mustika Sembuluh 2	2015	Central Kalimantan	Certified
		KUD Tabiku Makmur, KUD Karya Bersama	2020	Central Kalimantan	Un-Certified (Final Audit has conducted but failed result so re-audit)
PT. Tania Selatan	2010	Burnai Barat, Burnai Timur	2010	South Sumatra	Certified
		KUD Bumi Jaya, KUD PUMA, KUD Tunggal Mulya, KUD Sinar Sawit Bahagia, KUD Dwi Tunggal, KUD Tani Mandiri, KUD Maju Jaya	2016	South Sumatra	Certified
Sri Kamusan	2010	Hibumas 1, Hibumas 2, Sri Kamusan, Jebawang, Sekar Imej, Sapi Sugut	2010	Sandakan, Sabah	Certified
PT. AMP Plantation	2011	AMP I, AMP II, AMP III, AMP IV, Primatama Mulia Jaya, Koperasi Tompek Tapan Kandise, Koperasi AWM, Koperasi BST, Koperasi MSJ	2011	West Sumatra	Certified
		KUD Dastra II, KUD Dastra 1	2023	West Sumatra	Un-Certified
PT. ANI (Sambas)	2012	ANI Sambas	2012	West Kalimantan	Certified
		KUD Cempaka Biru, KUD Sentama Lestari (Plasma binaan ANI 1 Sambas)	2017	West Kalimantan	Certified
PT. Buluh Cawang Plantation	2012	Bumi Arjo, Dabuk Rejo, Sukamulya, Bambu Kuning	2012	South Sumatra	Certified
PT. Bumi Sawit Kencana	2012	Bumi Sawit Kencana 1, Bumi Sawit Kencana 2, Karunia Kencana Permaisejati 1	2013	Central Kalimantan	Certified
PT. Sarana Titian Permata 1	2012	Sarana Titian Permata 1, Sarana Titian Permata 2, Sarana Titian Permata 3	2023	Central Kalimantan	Un-Certified (new certification process)
PT. Sarana Titian Permata 2	2020	Sarana Titian Permata 2, Sarana Titian Permata 3	2023	Central Kalimantan	Un-Certified (new certification process)

PT. Gersindo Minang Plantation	2013	Gersindo Minang Plantation, Permata Hijau Plantation-1, Permata Hijau Plantation-2	2013	West Sumatra	Certified
		KUD Sasak, KUD Kapar, Mutiara Bosa Sikilang, Permata Sawit Maligi	2023	West Sumatra	Un-Certified
		PHP-1 (block 22)	2020	West Sumatra	Un-Certified
PT. Daya Labuhan Indah	2013	Wonosari, Sei Deras, Cabang Dua	2013	North Sumatra	Certified
PT. Milano (Cabang Dua Estate)	2013	(Supply base DLI-2)	2013	North Sumatra	Certified
PT. Agro Palindo Sakti	2014	PT Agro Palindo Sakti Estate	2014	South Sumatra	Certified
PT. Mentaya Sawit Mas	2015	Mentaya Sawit Mas 1, Mentaya Sawit Mas 2, Bumi Sawit Kencana 2	2015	Central Kalimantan	Certified
PT. Sinarsiak Dianpermai	2020	PT Sinarsiak Dianpermai Estate	2020	Riau	Stage 1
BBPOP (Benso Plantation)	2015	Benso, Benso Smallholder	2015	Ghana	Certified
PT. Murini Sam Sam	2015	Murini Sam Sam Estate	2015	Riau	Certified
PT Bumi Pratama Khatulistiwa	2017	Bumi Pratama Khatulistiwa Estate Buluh Cawang Estate	2017	West Kalimantan	Certified
PT Karunia Kencana Permaisejati	2017	PT. Karunia Kencana Permaisejati 1, PT. Karunia Kencana Permaisejati 2, PT. Karunia Kencana Permaisejati 3	2017	Central Kalimantan	Certified
PT Rimba Harapan Sakti	2015	PT. Rimba Harapan Sakti 1, PT. Rimba Harapan Sakti 2, PT. Kerry Sawit Indonesia 3	2015	Central Kalimantan	Certified
PT Agronusa Investama Pahauman	2020	PT ANI Pahauman Estate PT Pratama Procentindo	2020	West Kalimantan	Un-Certified
PT. Agro Palindo Sakti 2	2018	Agro Palindo Sakti, Putra Indotropical, Daya Landak Plantation, Indoresin Putra Mandiri	2020	West Kalimantan	Un-Certified
PT. Agroindo Indah Perkasa 2	2023	PT Agroindo Indah Perkasa Estate	2023	Bangko – Jambi	NPP Audit
PT. Musi Banyuasin Indah	2020	Sei Selabu, Sei Jarum, KUD Karya Gatra, KUD Karya Makmur Sriwijaya, KUD Panca Karya Jaya, KUD Sumber Makmur, KUD Tri Tunggal Karya	2020	South Sumatera	Un-Certified (fail in IC stage)

\*) updated 02 August 2019, reduction of scope PT Perkebunan Anak Negeri Pasaman (PANP Estate) and PT Karya Agung Megah Utama (KAMU Estate).

#### 1.10.2 Progress of Associated Smallholders and Outgrowers for Certifiable Standard

KUD Damai Sejahtera (DASTRA) as an associated smallholders which supervised management by the PT. AMP and PT. PMJ has failed to be submitted within 1<sup>st</sup> certification cycle due to cooperative internal problem. According to interview in Jorong Ampek Koto and Jorong Wonosari, auditor found clearly information that this cooperative has internal land conflict. Therefore,

<p>this cooperative has postponed for certification However, certificate holder has self-assessment for this cooperative unit and it will planned to be submission for certification in 2019.</p>
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<b>2.0</b>	<b>ASSESSMENT PROCESS</b>
<b>2.1</b>	<b>Assessment Team</b>
<b>ASA-1.2</b>	<p><b>Andi Pratama Pasaribu (Lead Auditor).</b> Indonesian citizen. Bachelor degree, majoring social economy. He has several of work experiences (more than 5 years) as the operational staff since 2008. He has been followed the Training of Lead Auditor Indonesian Sustainable Palm Oil (ISPO) which was held by ISPO Commission in 2013 and Training of Lead Auditor Roundtable on Sustainable Palm Oil (RSPO) by Proforest and Daemeter in 2016. He has been attended several kinds of training related to sustainability palm oil audit such as High Conservation Value (HCV) Training, Lead Auditor ISO 9001:2008, Lead Auditor ISO 14001:2005, auditor OHSAS, lead auditor RSPO supply chain by BMTRADA etc. He has some experiences of RSPO audit in Indonesian palm oil in aspect of best management practices, land legality, environmental, social and worker welfare aspect. During this audit, he verify legal aspect and supply chain.</p> <p><b>Mohamad Amarullah (Auditor).</b> Indonesian Citizen. Master of Wood Science and Technology and Bachelor of Forestry, majoring in Forest Product Technology. Has experience as an Agronomist and Research Assistant in Indonesia and Malaysia from 2008 to 2014. Has attended several trainings such as lead auditor of ISPO, RSPO, ISO 17021, ISO 17065, ISO 9001, ISO 19001, SA 8000 Awareness, ISO 14001, HCV, SCCS, etc. Has conducting several RSPO, ISPO and MSPO audit scheme as an auditor and lead auditor with expertise on best management practices for estate and mill (BMP), environment, conservation, safety, legal, social and supply chain aspects. Fluent in Bahasa, Malay and English. At the time of audit, has verify aspect of transparency, BMP, and OHS.</p> <p><b>Rindu Galih Rezza Rachmansyah (Auditor Trainee).</b> Indonesian citizen, Bachelor of Agriculture department of plant and pest disease (Agrotechnology). He has 1 year experience as Field Expert in Pesticide Company and 3 years experience in Industrial Forest Management, Forest Rehabilitation and Reclamation on BUMN Indonesia as Assistant. Training which had attended including Training Lead Auditor ISO 9001, ISO 14001, ISO 17021, ISO 19011, Training ISPO, RSPO awareness, RaCP and NPP awareness for RSPO, OHSAS 18001 : 2007. He has been involved in several audit activities related to sustainable palm oil certification since 2017 covering Best Management Practices aspect, social aspect and worker welfare aspect. During the assessment, he assigned to support verify worker welfare and transparency.</p> <p><b>Steve Mualim (Auditor).</b> Indonesia citizen. Master of Environmental and Natural Resources Management. Has experience as an environmental management consultant in 2012 and sustainable palm oil assurance auditor since 2013. Has attended several trainings i.e.: supply chain, palm oil GHG emission, HCV management, ISPO lead auditor, RSPO lead auditor, labor and human rights issues, ISO 19011, ISO 9001:2008, etc. Has conducting several audit for RSPO, ISPO and MSPO scheme with expertise on best management practices, conservation and environmental management. Fluent in Bahasa and Chinese Mandarin. In this audit He conducted an assessment on social aspect, HCV, waste management, and environmental management.</p>
<b>2.2</b>	<b>Assessment Methodology, Assessment Process and Locations of Assessment</b>
<b>2.2.1</b>	<b>Figure of person days to implement assessment</b>
<b>ASA-1.2</b>	<p>Number of auditors : 3 auditors &amp; 1 trainee</p> <p>Number of days for <b>ASA-1.2</b> at site : 6 days</p> <p>Number of working days for <b>ASA-1.2</b> at site : 18 Working days</p>
<b>2.2.2</b>	<b>Assessment Process</b>
<b>ASA-1.2</b>	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT AMP PLANTATION to the requirements of Indonesian National Interpretation of RSPO Principles and Criteria 2013 by INA-NITF, July 2016 (Endorsed by the RSPO Board of Governors meeting on 30<sup>th</sup> September 2016 and RSPO Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014 revised on 14 June 2017 (Module E for CPO Mill)</p> <p>The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) interview, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site.</p> <p>Some opportunities for improvement of the results <b>ASA-1.2</b> delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase (<b>ASA-1.3</b>).</p>

Improvement of findings from main assesment findings were observed by auditors at this **ASA-1.2** assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of **ASA-1.2**.

The auditor team conducted an opening meeting on 06 May 2019 in the Meeting Room of PT AMP Plantation. Before the audit activity took place, there was a complaint to PT Primatama Mulia Jaya on the RSPO website, so the auditor team conducted an interview with the parties who submitted the complaint when the audit activity took place to verify it. In addition to carrying out the verification, the auditor team also carried out RSPO audit activities as usual, namely conducting field observations which were used as audit sampling, conducting public consultations to the stakeholders and document verification activities. The audit team conducted a closing meeting on 11 May 2019 at the same location when the opening meeting was held.

The assessment program please find Appendix 2

**2.2.3**
**Locations of Assessment**
**ASA-1.2**
**AMP 2 Estate (06 May 2019)**

- **Block 15 A/B.** Observation of **Glyphosate Application** and interview with Foreman, 1 Tractor Driver and 6 Pesticide Applicators (all females), on their understanding towards technical, OSH, manpower, environment and conservation aspects, as well as facilities provided by the company.
- **Block 17 A.** Observation to **Water Bund Off** management which maintain water level on 50-70 cm which monitored every week.
- **Block 17 B.** Observation to **Piezometer** and **Peat Subsidence Pole** which already installed since 2010. As measured, subsidence rates was approximately 3.62 cm/year. Monitoring period of the former and the later measurement instruments were twice a month and twice a year, respectively.
- **Block 24 A/B.** Observation of **Kieserite Application** and interview with Foreman and 4 Fertilizer Applicators (all females) on their understanding towards technical, OSH, manpower, environment and conservation aspects, as well as facilities provided by the company.
- **Block 22 A.** Observation of **Harvesting Activities** and interview with Foreman, 1 Harvesting Clark and 2 Harvesters, on their understanding towards technical, harvesting system, OSH, manpower, environment and conservation aspects, as well as facilities provided by the company.
- **Block 20C.** Observation to **Barn Owl Box**
- **Masang kanan riparian block 1C div 1.** Observation for HCV management
- **BPN04 blok 1C div 1.** Observation legal operational boundary
- **BPN 02 blok 2C div 1.** Observation legal operational boundary
- **BPN 03 blok 2A div 1.** Observation legal operational boundary
- **Landfill block 1 div 1.** Observation for OHS and domestic waste management
- **Chemical store.** Observation for OHS and material handling
- **Fertilizer store.** Observation for OHS and material handling
- **Workshop.** Observation for OHS and waste management
- **Power house.** Observation for OHS and waste management
- **Diesel fuel tank.** Observation for OHS and material handling
- **Spraying team PPE store.** Observation for OHS and ex agrochemical waste management
- **Spraying team Rinse house.** Observation for OHS and ex agrochemical waste management
- **Fertilizer sack washing store.** Observation for OHS and ex agrochemical waste management
- **Clinic.** Observation for OHS and worker facilities
- **Workers housing.** Observation for OHS and worker welfare
- **Land application block 8B div 1 (AMP-1).** Observation for POME management

**AMP 1 Estate (06 May 2019)**

- **Block 22/23 E.** Observation to **EFB Mulching** which applied on immature (2018 planted) area. Dosage of application was reported 25 ton EFB/ha/year.
- **Block 3.** Observation to **Nursery** location. Palms (from seeds and tissue culture) upkeep and best nursery management practices were managed under AMP 1 Estate.
- **Block 8.** Observation to **Land Application** area. There is no leakage on the field.



**PMJ Estate (07 May 2019)**

- **Block 18 E dan 19 A.** Observation to Bund-off and water level measurement monitoring. Overflow is setted up maximum in level 70 cm. Water level during visit was 65 cm.
- **Block 18 C and 18 E.** Observation to **Barn Owl Box** Occupation.
- **Block 13 C.** Observation to **Peat Subsidence Pole** which already installed since 2012. As measured, subsidence rates was approximately 1.14 cm/year.
- **Block 20 D.** Observation to **Pupa (Kokon) hand-picking** and interview with 2 P&D workers which also insecticide applicator, on their understanding towards technical, harvesting system, OSH, manpower, environment and conservation aspects, as well as facilities provided by the company.
- **BPN 03 block 20C div 1.** Observation legal operational boundary
- **BPN 04 block 22B div 1.** Observation legal operational boundary
- **Workers housing.** Observation for OHS and worker welfare
- **Landfill block 16A.** Observation for OHS and waste management
- **Block 10B occupation areas.** Observation occupation area
- **Hazardous waste store.** Observation for OHS and hazardous waste management
- **Workshop.** Observation for OHS and waste management
- **Chemical store.** Observation for OHS and material handling
- **Lubricants store.** Observation for OHS and material handling
- **Spraying team PPE store.** Observation for OHS and ex agrochemical waste management
- **Spraying team Rinse house.** Observation for OHS and ex agrochemical waste management
- **Fertilizer sack washing store.** Observation for OHS and ex agrochemical waste management
- **Diesel fuel tank.** Observation for OHS and material handling
- **Clinic.** Observation for OHS and worker facilities
- **Emergency response team simulation.** Observation for emergency response team

**Tompek Tapian Kandis Cooperative (08 May 2019)**

- **Block 4 A/B** Observation to **Pheromone Trap** area.
- **Block 4 D.** Observation of **Harvesting Activities** and interview with Foreman and 1 Harvester, on their understanding towards technical, harvesting system, OSH, manpower, environment and conservation aspects, as well as facilities provided by the company.
- **Block 2 A.** Observation to **replanting area** which starts to be planted in the middle of 2019. Hilly slopes area where covers small portion of area was converted into flat.
- **Workers housing.** Observation for OHS and worker welfare
- **Daycare.** Observation for workers welfare and facilities
- **Masang kiri riparian block 2.** Observation for HCV management
- **Landfill block 5.** Observation for OHS and domestic waste management
- **Fertilizer store.** Observation for OHS and material handling
- **Diesel fuel tank.** Observation for OHS and material handling
- **Power house.** Observation for OHS and waste management
- **Spraying team PPE store.** Observation for OHS and ex agrochemical waste management
- **Spraying team Rinse house.** Observation for OHS and ex agrochemical waste management
- **Fertilizer sack washing store.** Observation for OHS and ex agrochemical waste management
- **Clinic.** Observation for OHS and worker facilities
- **Hazardous waste store.** Observation for OHS and hazardous waste management
- **Emergency response team simulation.** Observation for emergency response team

**Bukit Sandiang Tigo Cooperative (09 May 2019)**

- **Block 4 A.** Observation of **Harvesting Activities** and interview with Foreman and 2 Harvester, on their understanding towards technical, harvesting system, OSH, manpower, environment and conservation aspects, as well as facilities provided by the company.

- **Block 2 A.** Observation of **Loosefruit Collection Activities** and interview with 2 Loosefruits Pickers, on their understanding towards technical, harvesting system, OSH, manpower, environment and conservation aspects, as well as facilities provided by the company.
- **Block 1 B.** Observation to **EFB mulched** area.
- **Masang kiri riparian.** Observation for HCV management
- **Workers housing.** Observation for workers facilities and welfare, OHS, and waste management
- **Daycare.** Observaton for OHS and workers welfare.

#### **AMP POM (10 May 2019)**

- **Loading Ramp Station.** Observation and Interview with workers related to personnel understanding over the applicable SOP, implementation of OHS, training from company and worker welfare.
- **Station Sterilizer.** Observation and interview with 1 Operator, on his understanding towards technical, OSH, manpower and environment, as well as facilities provided by the company.
- **Station Clarification.** Observation and interview with 1 Operator, on his understanding towards technical, OSH, manpower and environment, as well as facilities provided by the company. Also observed 2 **Apprentices** on maintenance activities.
- **Station Press.** Observation and interview with 1 Operator, on his understanding towards technical, OSH, manpower and environment, as well as facilities provided by the company.
- **Station Crane.** Observation to crane activities.
- **Station Nut and Kernel.** Observation and interview with 1 Operator, on his understanding towards technical, OSH, manpower and environment, as well as facilities provided by the company.
- **Station Boiler (3 x 45 ton/hour).** Observation and interview with 3 Operators, on their understanding towards technical, OSH, manpower and environment, as well as facilities provided by the company.
- **Station Engine Room (Capacity 200 kVA, 608 kVA and 512 kVA).** Observation and interview with 1 Operator, on his understanding towards technical, OSH, manpower and environment, as well as facilities provided by the company. Observed 4 maintenance workers activities.
- **Workshop and Workshop Electric.** Observation and interview with 2 Operators, on their understanding towards technical, OSH, manpower and environment, as well as facilities provided by the company.
- **Water treatment plant.** Observation for water usage monitoring and OHS
- **Lubricants store.** Observation for OHS and material handling
- **Chemical store.** Observation for OHS and material handling
- **Hazardous waste store.** Observation for hazardous waste management and OHS
- **Empty bunch areas.** Observation for empty bunch management and OHS
- **Effluend pond.** Observation for OHS and waste management
- **Biogas plant (on progress commisioning).** Observation for OHS and POME utilization
- **Laboratorium.** Observation and Interview with workers related to personnel understanding over the applicable SOP, implementation of OHS, training from company and worker welfare.
- **Hydrant No. 03 & 06.** Observation related to simulation of emergency procedure.

#### **Stakeholder**

- Public consultation with government of Agam District, Province of West Sumatera (Environmental Agency; “Pelayanan Terpadu Satu Pintu dan Ketenagakerjaan”; National Land Agency and Plantation Agency)
- Public consultation with government of Pasaman Barat District, Province of West Sumatera (Labor Inspector of West Sumatera Province and Plantation Agency)
- Public consultation with surrounding community (Local Contractor, Wali Jorong Tapian Kandih, Ninik Mamak Kinali, Jorong Bancah Kariang and Ninik Mamak Langgam Kinali)
- Public consultation with Internal Stakeholders (Gender Committee, Labor Union and Worker Cooperative)

<b>2.3</b>	<b>Stakeholder Consultation and Stakeholders Contacted</b>
<b>2.3.1</b>	<b>Summary of stakeholder consultation process.</b>
<b>ASA-1.2</b>	The public consultation with stakeholders to PT AMP PLANTATION done through: <ul style="list-style-type: none"> <li>• Conduct a public announcement on the CB website (<a href="http://www.mutucertification.com">www.mutucertification.com</a>) on 22<sup>th</sup> April 2019.</li> </ul>

	<ul style="list-style-type: none"> <li>• Conducting visits and direct interviews with stakeholders in Agam District, Province of West Sumatera (Environmental Agency; “<i>Pelayanan Terpadu Satu Pintu dan Ketenagakerjaan</i>”; National Land Agency and Plantation Agency) on 06<sup>th</sup> May 2019.</li> <li>• Conducting visits and direct interviews with stakeholders in Pasaman Barat District, Province of West Sumatera (Labor Inspector of West Sumatera Province and Plantation Agency) on 07<sup>th</sup> May 2019.</li> <li>• Conduct consultations via email questionnaire to NGOs (WALHI, Sawit Watch, World Wildlife Fund for Nature, and Aliansi Masyarakat Adat Nusantara) on 01<sup>st</sup> May 2019.</li> <li>• Conducting visits and direct interviews with stakeholders (Local Contractor, Wali Jorong Tapian Kandih, Ninik Mamak Kinali, Jorong Bancah Kariang and Ninik Mamak Langgam Kinali) on 06<sup>th</sup> – 08<sup>th</sup> May 2019</li> <li>• Conducting Interviews with the Cooperative Employees, local contractor, Gender Committee, Labor Union on 06<sup>th</sup> – 08<sup>th</sup> May 2019.</li> </ul>
<b>2.3.2</b>	<b>Stakeholder contacted</b>
	Please find appendix 1
<b>2.4</b>	<b>Determining Next Assessment</b>
	The next visit ( <b>ASA-1.3</b> ) will be determined eight (8) to twelve (12) after date of certificate.

### 3.0. ASSESSMENT FINDINGS

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

MUTUAGUNG LESTARI has conducted an assessment of **AMP POM – PT AMP Plantation subsidiary of Wilmar International Ltd** operation consisting of one (1) mill and nine (9) oil palm estates.

During the assessment, there were two (3) nonconformities were assigned against Major Compliance Indicators and one (1) nonconformities were assigned against Minor Compliance Indicators and nine (3) opportunities for improvement were identified.

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

Therefore MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is Continued.

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
<b>PRINCIPLE #1 COMMITMENT TO TRANSPARENCY</b>		
<b>1.1</b>	<b>Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</b>	
<b>1.1.1 &amp; 1.1.2</b>	<p>The company has procedure for information demand from another relevant stakeholder in “SOP Pelayanan Informasi” No. PRO-BNM-006 which describe the types of information that can be accessed by public such as:</p> <ul style="list-style-type: none"> <li>• Company policy</li> <li>• Company Yearly Report</li> <li>• OHS and Environment Plan</li> <li>• Assessments and plan for SEIA</li> <li>• HCV documents</li> <li>• Company CSR Plan and Realization</li> <li>• Public summary and certification assessment reports</li> <li>• Etc.</li> </ul> <p>The entire information above can be easily accessed by stakeholders and document that not list above is confidential document. Based on the interviews with the surrounding community it is known that they have understood the procedure of requesting information to the company by sending a request for information.</p> <p>The company has a Stakeholder List (update 2019). These stakeholders have been grouped, consisting of: Government / Institutions related to Regency, Village &amp; Sub-District Governments, Local Communities, Community Institutions / Organizations, Supplier of Material / Goods Supplies to Companies, External FFB Suppliers and Local Contractors.</p> <p>Socialization for transparency of company document information along with the procedure is done by writing to stakeholders such as agencies, surrounding communities and contractors. In addition to formally disseminating through letters, the company also conducts socialization verbally to stakeholders when meeting / meeting between the two parties.</p> <p>Based on the results of interviews with the Agam District government agencies, Pasaman Barat and surrounding village communities it was known that access to the types of information that could be accessed along with the procedures for accessing it was stated in the “SOP Pelayanan Informasi” which was socialized annually.</p>	
	<b>Status: Comply</b>	

**1.2**

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

**1.2.1**

The company has an SOP to respond to stakeholders well, namely the PRO-BNM-008 Revised SOP 02 dated October 1, 2013 concerning Communication Procedures, Consultation and Coordination with Stakeholders. In the SOP it explains the mechanisms for handling stakeholders properly when communicating, consulting and when coordinating. Other than that the company has procedure for information demand from another relevant stakeholder in "SOP Pelayanan Informasi" No. PRO-BNM-006 which describe the types of information that can be accessed by public such as:

- Company policy
- Company Yearly Report
- OHS and Environment Plan
- Assessments and plan for SEIA
- HCV documents
- Company CSR Plan and Realization
- Public summary and certification assessment reports
- Etc.

The entire information above can be easily accessed by stakeholders and document that not list above is confidential document. Based on the interviews with the surrounding community it is known that they have understood the procedure of requesting information to the company by sending a request for information.

Based on the overall review of documents of "Buku Surat Masuk dan Keluar", it is known that the certificate holder have responded to the letter of information requests to the stakeholders in accordance with established procedures and not exceeding the time period specified.

**Status: Comply**

**1.3**

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

**1.3.1**

the company has a Company Code of Ethics (applicable to Plantation & Industry), Approved by the Country Head, known by HRGA Corporate Head (Human Resource and General Affair) and Examined by the Sustainability Division Head, effective from 15 December 2015, Revision 01 dated 28 / 3/2016 (Document No: 044 / DIR-KP / XII / 2015). The policy explain some things, including:

- Point 1. General (General) that employees are required to be good and polite in accordance with ethical values and behavior according to ethical standards and norms set by the Company
- Point 5. Bribery and Illegal or Unethical Trading Practices that employees must refrain from illegal or unethical actions that can damage the company's reputation
- Point 9 besides information related to confidentiality, there is also information that can be given to the parties.

The company has documented and communicated the Company's Code of Ethics to all employees and other relevant stakeholders. This was done as an effort to continuously ensure the understanding of workers and stakeholders towards the Company's Code of Ethics. Based on the results of interviews with local contractors, it is known that the company has always delivered socialization related to the code of ethics to local contractors at the time of signing the work contract so that the contractor understands the provisions well. In addition, during interviews with harvest, fertilizer, spray workers and factory operators, it was found that workers had a good understanding of the code of ethics in working in the company's operational environment.

**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**

List of Laws/Regulations which adopted as reference for oil palm plantation activities in PT AMP Plantation, PT PMJ and



Smallholders are presented in several documents, as follows:

- Document No. FRM-HRD-055 (Revision 03; Review 12) about Law Register (*Daftar Peraturan dan Perundangan*) for Occupational Health and Safety, which approved by Group Estate Manager (GEM) on 28 February 2019. The register has consist of 6 Laws/Acts or *Undang-undang* (UU); 2 Government Regulations or *Peraturan Pemerintah* (PP); 1 President Regulation or *Peraturan Presiden* (Perpres); 25 Minister Regulations or *Peraturan Menteri* (Permen); 6 Minister Decree or *Keputusan Menteri* (Kepmen); and 1 Director General Decree or *Keputusan Direktur Jenderal* (KepDirjen).
- Document No. FRM-HRD-056 (Revision 03; Review 13) about Law Register for Manpower, which approved by GEM on 11 January 2019. The Register has consist of 16 Act's; 5 PP's; 2 Kepres's and 11 Permen's.
- Document No. FRM-GEN-022 (Revision 02; Review 14) about Law Register for Environment, which approved by GEM on 02 January 2018. The Register has consist of 9 Acts; 12 PP's; 1 President Instruction or *Instruksi Presiden* (Inpres); 33 Permen's; 31 Kepmen's; 3 Decrees of Head of Bapedal; and 2 Governor of Sumatera Barat Regulations.
- Document No. FRM-BNM-13 (Revision 03; Review 15) about Law Register for Plantation Company, which approved by GEM on 28 December 2017. The Register has consist of 20 Acts; 20 PP's; 4 President Decrees or *Keputusan Presiden* (Kepres); 20 Permen's; 8 Kepmen's; 11 Governor of Sumatera Barat Decree and Regulations; and 2 other Regulations from Bank of Indonesia.

### Land Legality

Each certification unit has had land legal as follows:

- PT. AMP Plantation  
Total of land title **9,226.42 Ha** that released on 1997, 2000, 2004, and land building **220.990 m<sup>2</sup>** that released on 1996.
- PT. Primatama Mulia Jaya  
Total of land title **1,940 Ha**
- Cooperative Bukit Sandiang Tigo  
Customary land title **226 Ha** (113 smallholder)
- Cooperative Tompek Tapian Kandis  
Private land title **512 Ha** (256 smallholder)
- Cooperative Agro Wira Masang  
Customary land title **810 Ha** (405 smallholder) and **90 Ha** (private land title)
- Cooperative Mutiara Sawit Jaya  
Private land title **220 Ha** (110 smallholder)

Total of certification scope: **13.046.30 Ha certified area**. Divided into 11,188.52 Ha land title (HGU and HGB), 92 private land title and 1,768 Ha customary land title.

### Plantation Permit or equivalent in accordance in national regulation:

- PT. AMP Plantations: IUP on 2008 from Head District of Agam **7,925.42 Ha** and from Head District of West Pasaman for plantation activity **± 1,300 Ha**.
- PT. Primatama Muliajaya: Letter of Registration of Plantation Business No. 206/Menhutbun-VII/2000 dated March 10, 2000 with total area of 1,940 Ha; commodity types is oil palm.

### Associated Smallholders

Cooperative Tompek Tapian Kandis total land certificates are 512 Ha (256 ownership right/Hak Milik); Cooperative Mutiara Sawit Jaya: 220 Ha (110 ownership right/Hak Milik); Cooperative Sandiang Tigo 226 Ha (Traditional Rights or "Hak Ulayat"/ 113 ownership); Cooperative Agro Wira Masang consisting of 810 Ha with status of traditional rights (405 ownership) and 90 Ha as ownership right/Hak Milik (45 ownership). The history of land tenure ownership and the actual legal use of the land are available, including statement of traditional rights or Hak Ulayat from their leader or "Ninik Mamak".

Law Register has describes principle and criteria related to the laws/regulation, title of law/regulation, respective section or article, key point or explanation of the articles, status of pursuance/compliance and remarks. Law Registers has distributed by Document Controller (DC) to the GEM, All Estate Managers, Mil Manager, Smallholder Manager, Company doctor, *Bina Mitra* Manager, HRD Manager and EHS Manager. The CH has shown several compliances towards legal requirements, for example as follows:

- **BMP Aspect:** The CH has conducts zero burning method during land clearing activities, as mentioned by Plantation Agency of Agam Regency; has adopting integrated pest management which consist of early warning system, census, biological control, chemical control, monitoring and evaluation (see Indicator 4.5.1 for further detail); has only used pesticides listed in Pesticides Commission of Department of Agriculture and has also has no use of Paraquat; and has only plants seeds which produced from government recognised seeds producers such as DxP Socfin from PT Socfin Indonesia and DxP Marihat from Indonesia Oil Palm Research Institute (PPKS) in Medan.
- **OSH Aspect:** OSH Committee (P2K3) report has been delivered on schedule; Oil Palm Processing Machinaries License monitoring. Monitoring Periodic Inspection by PT Arpitek Inspection for all heavy machinaries in all samples estates were available; has monitor operator licenses as required by regulations. For example, AMP Mill has 10 Licenses for 10 Operators (4 Class 1), 3 Licences for Sterilizer Operators, 4 Licenses for Hoisting Crane Operators, 4 Licenses for Dump Truck Operators, 1 License for Static Crane Operator, 6 Certificates of Welders, etc. Furthermore, Acta License for 42 Machinaries Devices and Calibration of 17 Measurement Devices were available.

### Worker Welfare

- The company has applied a minimum wage in the wage system and is in accordance with Minister of Manpower Regulation No. 07 of 2013 concerning Minimum Wages
- The company has a wage structure and scale for each level of work and is in accordance with Minister of Manpower Regulation No. 01 of 2017 concerning Wage Structure and Scale
- The company routinely reports annual Mandatory Labor Reports and is in accordance with Minister of Manpower Regulation No. 18 of 2017 concerning Mandatory Reporting on Labor

### 2.1.2

Procedure of monitoring and update of laws and/or regulation are presented in procedure No. PRO-BNM-005 (Rev. 03) dated 01 October 2013 about Identification and Evaluation of Applicable Laws/Regulations; and procedure No. PRO-BNM-004 (Rev. 02) dated 01 October 2013 about Law/Regulation Requirements Pursuance or Compliance. Both procedure mentioned that monitoring and update of laws/regulations was carried out every Semester by the respective Managers, described as follows:

- *Bina Mitra* Manager for plantation and best management practices (BMP) aspect.
- Environment Health and Safety (EHS) Manager for environment, occupational and safety (OSH) aspect.
- Human Resources Department (HRD) Manager for manpower aspect.

Source of Laws and Regulations were derived from Industry Associations (for example KMSI, SPSI, GAPKI); Non Government Organizations (NGO); Public Media (Radio, Television, Newspaper and Respective Websites); Government Institutions; etc. According to latest Evaluation on 28 February 2019, it was informed that there were two new laws/regulation identified on those particular period, related to Safety aspect. Semester update and evaluation was conducted by the respective Managers as mentioned above.

### 2.1.3 and 2.1.4

Legal Officer, *Bina Mitra* Manager, EHS Manager and HRD Manager has conducting evaluation of laws and regulations pursuance every semester as mentioned in procedure No. PRO-BNM-005 (Rev. 03) and No. PRO-BNM-004 (Rev. 02) dated 01 October 2013. Evaluation notes is presented in Law Register document. Based on Law register Review, it was known that the CH has fully comply with Indonesian Laws and Regulaitons. Furthermore, According to law Register review dated 28 February 2019, it was known that there were 2 new regulations identified, as follows:

- Manpower Ministry Regulation No. 05 in 2018 about occupational health and safety in working environment.
- President Regulation No. 07 in 2019 about disease due to work activities.

There is also deduction of 4 regulation from the list, e.g. Permen Perburuhan No. 07 in 1964; Permenakertrans No. 13 in 2011; Circulation Letter of Menakertrans No. SE01/Men/1978 and Kepres No. 02 in 1993.

**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

Each certification unit has had land legal as follows:

- PT. AMP Plantation  
Total of land title **9,226.42 Ha** that released on 1997, 2000, 2004, and land building **220.990 m<sup>2</sup>** that released on 1996.
- PT. Primatama Mulia Jaya  
Total of land title **1,940 Ha**
- Cooperative Bukit Sandiang Tigo  
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- Cooperative Agro Wira Masang  
Customary land title **810 Ha** (405 smallholder) and **90 Ha** (private land title)
- Cooperative Mutiara Sawit Jaya  
Private land title **220 Ha** (110 smallholder)

Total of certification scope: **13.046.30 Ha certified area**. Divided into 11,188.52 Ha land title (HGU and HGB), 92 private land title and 1,768 Ha customary land title.

### 2.2.2

Certificate holder has had procedure to maintain boundary poles in procedure number No. Dok. PRO-BNM-012, Rev.01 dated on 1 October 2013. In accordance to the procedure, human affair staff with surveyor team will identified boundary poles availability annually and monitored every 3 month by estate staff.

Based on random visit in AMP 2 and PMJ Estate to verify boundary poles availability concluded that all boundary poles are in place. For example:

AMP 2 Estate:

- BPN No. 4 block 1C
- BPN No. 2 Block 2C
- BPN No. 3 Block 2A

PMJ Estate:

- BPN No. 3 Block 20C
- BPN No. 4 Block 22B

Regarding to boundary poles issue in associated smallholder as written in previous assessment, auditor has interviewed customary leader called *Ninik Mamak* who is also a cooperative board of Tompek Tapian Kandis and Bukit Sandiang Tigo. Through the interview informed that they refuse to install a boundary poles due to not in accordance with their customary land right. Customary land is not for private ownership. Even no boundary poles installed, they agreed to maintain land demarcation between their own land and company's concession.

### 2.2.3

During the audit, auditor has interviewed some Minangnese elder called *Ninik Mamak*, board of cooperative (Tompek Tapian Kandis and Bukit Sandiang Tigo) and public consultation to the respective government agency in Agam and Pasaman Barat District known that there is no specific land conflict between the company with the surrounding peoples. However, there is a problem inside a *Ninik Mamak* that still no resolved yet.

### 2.2.4; 2.2.5

Certificate holder has had procedure to handling and manage land conflict (*Prosedur Penyelesaian Sengketa Lahan* No. Dok: PRO-BNM-013, Rev. 02 dated 23 Augustus 2016). This procedure are contain a specific guidance which is refer to FPIC mechanism to manage land conflict such as gathering information, conduct a meeting with complainant and use the understanding language during the process.

### 2.2.6

Wilmar International Limited has had Human Right Policy which was published in June 2014 and endorsed by the Group

and Group Head Plantation CSR Head. In the policy stated that the Wilmar's commitment to supports the respect and protection of human rights as a policy anti child labor, OHS, providing equal opportunity for everyone, reports and complaints, anti-sexual harassment, anti-violence and torture, respect for reproductive rights, and social responsibility company. This policy applies to all companies under subsidiaries of Wilmar International Limited including suppliers and contractors. Based on the results of consultation with employee representatives (gender committee on and labor union, village representatives from Jorong Salareh Aia, Tompek Tapian Kandis, Wonosari or customary leader (Ninik Mamak) Kinali, Tompek Tapian Kandis and Bawan and related agency of Agam and Pasaman Barat district known there was no issues of the use of confrontation and intimidation by the company to maintain peace and order, and there is no indication of the use of military or mercenaries.

**Status: Comply**

### 2.3

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

#### 2.3.1; 2.3.2; 2.3.3

To handling and manage Certificate holder has had several procedure related to FPIC mechanism such as:

- *Prosedur Penyelesaian Sengketa Lahan* (No. Dok: PRO-BNM-013, Rev. 02) dated 23 Augustus 2016).
- *Procedure Penerimaan Keluhan dan Penyelesaian Perselisihan* (PRO-BNM-007, Rev. 02, dated 17 February 2017).

Based on document review, District Government facilitated Wilmar to start their operation in Agam and Pasaman Barat District since early 1990. There also no new planting or new acquisition process after 2005. It mean, there is no FPIC mechanism upon that process. However, due to Minangnese customary right, the land acquisition process has proceeded with Minangnese elder called *Ninik Mamak* and witnessed by government agency. Company representatives has been met with *Ninik Mamak* in each operation area to discuss about land acquisition scheme. Certificate holder has showed the statement letter from each *Ninik Mamak* as follows:

- Statement letter on land handover from *Ninik Mamak* Bawan on 25 August 1991.
- Statement letter on land handover from *Ninik Mamak* Kinali Salareh Aia on 9 April 1993.
- Statement letter on land handover from *Ninik Mamak* Kinali Jorong VI Koto Selatan on 9 April 1993.
- Statement letter on land handover from *Ninik Mamak* Tapian Kandis on 7 April 1993.
- Statement letter on land handover from *Ninik Mamak* Bawan on 25 August 1991.
- Statement letter on land handover from *Ninik Mamak* Manggopoh on 1 March 1994.
- Statement letter on land handover from *Ninik Mamak* Tapian Kandis on 29 November 1994.
- Statement letter on land handover from *Ninik Mamak* Kinali Nagari Katiagan on 24 August 1995.

Based on interview with some former *Ninik Mamak* that signed statement letter above known that there is an agreement to handover the land when 70% of land will be company's own estate and 30% left as a smallholder scheme. The 70% area compensated to the *Ninik Mamak* which called *silih jahiah* mechanism. And the rest of 30% not compensated due to will be back to *Ninik Mamak*. Since the process until now, there is an internally problem between the *Ninik Mamak* especially due to *Ninik Mamak* replacement and some Cucu Kemenakan want to renegotiation with the company.

Before this audit process, auditor's found information of grievance in RSPO website <https://askrspo.force.com/Complaint/s/case/50090000028EoXsAAK/detail> that submitted on 12 July 2018 (complaint reference RSPO/2018/12/RB) and accepted on 26 September 2018. This complaint status are now investigated. Based on interview with the company's legal staff region West Sumatra informed that this land dispute case actually been put on court and won by the company.

The other issue also sighted in Forest People Programme website: <http://www.forestpeoples.org/en/agribusiness-palm-oil-rspo/press-release/2018/press-release-palm-oil-plantations-linked> written by The Nagari Institute spokesman, auditor has met him on May 9, 2019. Through the interview known that they are now seeking RSPO to help them in order to conduct an investigation on this matter and make sure Wilmar not violated the customary land.

Information related to complaints from the Luhak Nagari Indigenous Community of Simpang Tigo Koto Baru has not been captured during the previous surveillance (Recertification and ASA-1.1), which the complaint has also already submitted to the RSPO on 12 July 2018 or after the ASA-1 audit on 7 July completed.



Based on the fact mentioned above, auditor team has conducting interview with several persons from Nagari Kinali (included Ninik Mamak) prior to the issue, summarized as follows:

- According to the customary right, Ninik Mamak Kinali stated that the customary land that handover to the local government (propose to be HGU) is truly on their own land. The process of handover by Ninik Mamak Kinali to the local government in 1996 has carried out in line with regulations and only involving Ninik Mamak of Kinali.
- Masyarakat Adat Luhak Nagari Simpang Tigo Koto Baru assume that their customary land has been handover to PT Primatama Muliajaya without FPIC process. There is no clearly demarcation sign that agreed by both customary leader (Ninik Mamak Simpang Tigo Koto Baru and Ninik Mamak Kinali) even until the land title certificate (HGU) issued on 1998. Each party claims to be the owner of the land.
- Auditor also interviewed the concerning parties (The Nagari Institute) who write the press release of customary land issues Masyarakat Adat Luhak Nagari Simpang Tigo Koto Baru) in Forest Peoples Programme website as mentioned above. Based on all land resolve document that has been verified during the audit (through the mutual agreement or legal action approach) stated that those land dispute area is belong to Nagari Kinali.
- Based on the document review, known that there are internal problems that have not been resolved at the top of customary board level (both internal Nagari Kinali and Nagari Simpang Tigo). For example, there is a letter from the *Yang Pertuan Kinali* on 2002 which stated a motion of mistrust in the agreements with the Ninik Mamak Nagari Simpang Tigo. Until the ASA-1.2 audit, there had not been any positive progress between the two parties (Ninik Mamak Adat Nagari Kinali and Simpang Tigo) to resolve this issue through a mutual agreement approach.

During the audit, auditor also elaborates the issues and found some information as follows:

### Document verification during the audit:

- *Masyarakat Adat Luhak Nan Tigo* claimed that PT. Primatama Muliajaya has occupy their customary land without FPIC process. That land has become a land title (HGU) owned by the company.
- There is statement letter of land handover from Ninik Mamak (red: board of customary leader) Village of IV Koto and Mandiangin, Nagari Kinali to the local government of Pasaman on 6 June 1996. Total area was  $\pm 7,150$  Ha. This statement letter has signed by:
  1. Mr Taufik Martha (District Head of Pasaman)
  2. Syahrul Dt. Marajo (Ninik Mamak Village IV Koto Kinali)
  3. Bulkaini Dt. Bandaro (Ninik Mamak Village IV Koto Kinali).
  4. Ilyas Majo Sadeo (Ninik Mamak/Urek Tunggang Adat Kinali).
  5. Ideal Syarif Nahkodorajo (Ninik Mamak Village Mandiangin)
  6. Darussamad Dt. Bando Kayo (Ninik Mamak Desa IV Koto Kinali).
- Letter of District Head of Pasaman dated 7 June 1996 regarding of reserve area for palm oil plantation (PT. Primatama Muliajaya) as 7,550 Ha.
- Head of National Land Title dated 26 October 1996.
- Land title certificate (HGU) No. 1 dated 25 February 1998.
- Land demarcation issues between *Masyarakat Adat Luhak Nan Tigo* and PT. Primatama Muliajaya.
- There is a memorandum of understanding between Ninik Mamak Simpang Tigo Koto Baru and Ninik Mamak Kinali on 10 July 1995 which stated that both parties will ground checked together to demarcated their customary land.
- There is memorandum of understanding between Ninik Mamak Simpang Tigo Koto Baru and Ninik Mamak Kinali on 1 June 2002 regarding customary land demarcation.
- There is a statement letter by Yang Dipertuan Kinali

on 18 June 2002 which stated that Ninik Mamak Simpang Tigo Koto Baru has breaking the previous MoU regarding to customary land demarcation.

- Yang Dipertuan Kinali and Daulat Parit Batu (top level of Kinali customary board) asked the Head of Pasaman District via official letter on 22 July 2002 to instruction land national team in order to measured customary land demarcation clearly.
- Yang Dipertuan Kinali and Daulat Parit Batu (top level of Kinali customary board) also sent letter to the Head of Pasaman District on 10 October 2002 which stated as follows:
  1. Land demarcation measurement should refer to the previous MoU in 1995.
  2. Land demarcation refer to natural line (actual field boundary), not measurement line.
- Based on the national land agency letter on 25 February 2004, Ninik Mamak Simpang Tigo Koto Baru has suing this case to the Court of Pasaman Barat District. However, All lawsuit contested has rejected by The Court on 28 October 2008.
- Due to rejection as mentioned above, Ninik Mamak Simpang Tigo Koto Baru has latter submitted the next legal stage (cassation) to The Indonesia Supreme Court (*Mahkamah Agung*), which also resulting rejectionn towards the appeal as filed by Sjarifudin Said DT. Sinaro in 30 June 2010.

According to the explanation above, it could be concluded that in term of Indonesia regulation, all land title of PT PMJ were previously belongs to Ninik Mamak Nagari Kinali which had compensate by the company. This fact has legitimate by *Mahkamah Agung* of Indonesia in 30 June 2010.

- Masyarakat Adat Luhak Nagari Simpang Tigo Koto Baru (Ninik Mamak Simpang Tigo Koto Baru) did not get scheme smallholder land.
- The company has provide the scheme smallholder area for Ninik Mamak Simpang Tigo Koto Baru. However, the area has burned by some community member of Nagari Simpang Tigo Koto Baru on 31 March 1999 as expresion of protest action.
- As follow up of incidence above, there is MoU between PT PMJ with the affected communities to overcome this unconducive situation on 22 July 1999, which resulting compensation of area for about 760 ha that dedicated to 380 families from Clan Member of Syaiful Usman Dt. Bandaro and Syahrul Ramadhan. Furthermore, there is a MoU between Smallholder of Simpang Tigo and KUD Dastra on 3 February 2003 which stated that the former party shall taking responsibility of the land management. However, the current situtation has indicate that the area is actually controlled individually by Simpang Tigo Koto Baru member, instead of managed by smallholder association.



**Public Consultation with Top Management (GM Legal and Sustainability Manager):**

The company adheres to the applicable legal principles. Land title process that prioritize the principles of mutual agreement. It can be proven by the existence of land compensation process of and *silih jariah* (red: land compensation payment in Minangs culture). In term of Legality, all PT PMJ's operational area has a Land title (HGU) certificate issued by BPN in 1998. This government's decision on issuing the HGU certificate has been sued several times until the Supreme Court of the Republic of Indonesia, and all these claims have been rejected.

Through the information above, auditor concluded that certificate holder has comply with the RSPO P&C. However, this process still on going through RSPO Complaint Panel and the progress will be observed in the next assessment as a main concern.

**2.3.4**

Based on document verification found the information that all *Ninik Mamak* has been involved in land handover process. According to the statement letter on land handover informed all *Ninik Mamak* that signed those document as follows:

- Statement letter on land handover from *Ninik Mamak* Bawan on 25 August 1991 (signed by 12 *Ninik Mamak*).
- Statement letter on land handover from *Ninik Mamak* Kinali Salareh Aia on 9 April 1993 (signed by 8 *Ninik Mamak*).
- Statement letter on land handover from *Ninik Mamak* Kinali Jorong VI Koto Selatan on 9 April 1993.
- Statement letter on land handover from *Ninik Mamak* Tapian Kandis on 7 April 1993 (signed by 5 *Ninik Mamak*).
- Statement letter on land handover from *Ninik Mamak* Bawan on 25 August 1991 (signed by 12 *Ninik Mamak*).
- Statement letter on land handover from *Ninik Mamak* Manggopoh on 1 March 1994 (signed by 7 *Ninik Mamak*).
- Statement letter on land handover from *Ninik Mamak* Tapian Kandis on 29 November 1994 (signed by 5 *Ninik Mamak*).
- Statement letter on land handover from *Ninik Mamak* Kinali Nagari Katiagan on 24 August 1995 (signed by 8 *Ninik Mamak*).

All of the document written in Bahasa.

	<b>Status: Comply</b>
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**PRINCIPLE #3 Commitment to long-term economic and financial viability**
**3.1**

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

**3.1.1**

Unit management shows long term management plan which issued by the respective Estate or Mill Manager, Account Manager and GEM, approved by Head Office in Medan. The CH (sampled estates and cooperatives) are able to shows PT AMP Plantation six year budget for period 2018-2024. Among parameters budgetted are financials, area statement, replanting, crop and estate cost, FFB production, FFB processed and milling cost, capital expenditure, FFB, CPO and PK price, maintenance cost, as well as sustainability implementation cost. According to Longterm Budget review, it was known that since there are presence of peat soil in estate operational area (exclude AMP 1 Estate), peat management budget such as maintenance towards drainage system, bund-off and weirs, piezometer and subsidence pole measurement were already budgetted by Estate Managers. Furthermore, CH Management unit stated that those longterm business plan mentioned above are subjected to be changed and reviewed annually by the respective management such as Mill or Estate Manager, Group Estate Manager and Account Manager through considering actual trends and dynamic situation which predicted could be changed in the future.

**3.1.2**

According to the AMP2 Estate replanting program and realization, it could be concluded that replanting realization in AMP 2 Estate is in accordance with the program, which was about 376.75 ha in 2019. Meanwhile, replanting for period 2019 will be conducted on July 2019. Furthermore, replanting in PMJ will be starts on 2024. Replanting on peat area has considering best management practices aspect such as maintenance of drainage systems, as well as monitoring towards water level, water table and peat subsidency, periodically. Replanting activities is conducted by zero burning method. This fact is obtained as informed by representative of Plantation Agency of Agam Regency, surrounding communities and during observation to Block 22/23 E AMP 1 Estate which replanted in 2018.

Replanting program for period 2017 to 2021 for TTK Cooperative is presented in document of Head of Cooperative Letter No. 05/KPS.TTK/III/2016 dated 07 March 2016. According to program and realization of replanting in TTK Plasma review, it was known that replanting program was delayed for two years, and starts in 2019 at Block 2. Up to 01 May 2019, 15.63 ha has been replanted with planting density 134 palms/ha. The rest of program was still ongoing as observed to Block 2A TTK Estate. Furthermore, replanting program for period 2017 to 2021 for BST Cooperative is presented in document of Head of Cooperative Letter No. 05/K-BST/B/III/2016 dated 05 March 2016. Unit management mentioned that replanting in BST was delayed due to funding from smallholders is still not enough. Moreover, they don't want replanting to be conducted by credit scheme.

**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**

Estate and Mill management informed that there are no revision on the current procedure of oil palm agronomy and processing, describes as follows:

- Procedure for oil palm processing are presented in document No. Dok PRO-MIL-001 to Dok PRO-MIL-008 dated 24 July 2014. The procedure has covers FFB acceptance, FFB processing, products (CPO and PK) storage, workshop, FFB purchasing from locals, products delivery and supply chain. Furthermore, there are procedure No. Dok SOP-MIL-001 to Dok SOP-MIL-028 which covers technical matters on station of weighbridge, grading, loading ramp, sterilizer, capstan, threshing, press, clarification, nut and kernel, boiler, power house, water treatment, kernel crushing plant, effluent, EFB transportation, hazardous waste storage, mill security, workshop, land applications, commodity delivery, sounding, statistic crane, CPO storage tank, mass balance, solid waste management, material handling, etc.
- Procedure for oil palm agronomy are presented in document No. PRO-EST-001 to PRO-EST-008. The procedure has covers nursery, land clearing through zero burning, planting, upkeep, harvesting, pesticide application, integrated pest management, and leaf and soil analysis. Furthermore, there are procedure No. SOP-EST-001 to SOP-EST-026 which covers technical matters on manuring, pesticide application through spraying method, selective weeding, pruning, pest and disease management, weeds control, EFB mulching, road maintenance, planting platform, racking, BMP on sandy area, pesticide application device calibration, soil erosion measurement, integrated pest management, replanting and fertilizer calibration.
- Safety procedure are presented in document No. PRO-GEN-008 (Rev. 02) and PRO-GEN-014 dated 01 October 2013. Detail of safety working procedure is described in Hazard Identification Risk Assessment Control (HIRAC) and Material Safety Data Sheet (MSDS) of agrochemicals

Based on procedure review, it could be concluded that the oil palm agronomy and processing procedures were still relevant with current situation and covers all main aspects from the field to the factory. All procedures were available in Bahasa and also applicable for Smallholder Estates. Furthermore, based on observation to estate and mill office, it could be concluded that the procedure were available onsite, distributed by Document Controller. Moreover, based on observation and interview with workers on the estates and mill, it was known that in general the workers were able to explain and demonstrate their technical matters in accordance with the procedure. They are also able to explain safety aspect, as well as type, usage and management of personal protective equipment being used during working hours.

##### **4.1.2**

List of procedure is presented in document No. FRM-GEN-002 which updated by Document Controller. In order to ensure consistency compliance towards procedure implementation, the CH has several mechanism which presented in several documents, as follows:

- Monthly Estate Manager, Crop and Cost Presentation and Daily production Statement.
- Daily FFB Grading Report which reported to Estate Manager to be follow up and used as evaluation parameters for harvesting quality.
- Maintenance book which informed production devices condition, type of problem, identification of problem, reparation action that shall be taken, PIC, time line of maintenance and priority status.
- Quality Agro management System (QAMS) report which prepared by Field Auditor and Agronomy manager that informed harvesting quality, recapitulation of non-productive palms, field upkeep condition, pest and disease incidence, etc.

- Annual Internal audit such as System Development Control (SDC), internal audit RSPO and ISPO. Every findings of audit is compulsory to be followed up, approved by the respective PIC and recorded on Problem Identification Corrective Action (PICA) sheet.
- To conduct regular training to the respective workers as programmed annually. See Indicator 4.8.2 for further detail.

### 4.1.3

The CH is able to shows record of monitoring as well as its follow up, for example as follows:

- **AMP Mill:** Crop and Cost Presentation Todate March 2019 informed that OER was still 18.98 %, and considered far from the budget which targetted about 21.50 %. This is due to harvesting (FFB) quality were not fulfill the standards. Thus, Assistant is required to control standard of harvesting.
- **AMP 2 Estate:** Crop and Cost Presentation Todate March 2019 informed that harvesting were over spent for 9 %. This is due to payment of harvester on incentive and loosefruit collection, but FFB production was lesser 11.19 % from the budget.
- **PMJ Estate:** SDC No. 001/SDC-SVR/RGN-EST/01/2019; date of visit was on 23 to 31 January 2019. Every finding notes were idetified root of cause, management response, recommendation , reference, action plan, PIC and dateline. Those finding identified were fully settled up on February 2019.
- **TTK Cooperative:** RSPO Internal audit in TTK Cooperative Estate is presented in document No. FRM-GEN-024 (Rev. 03) dated 08 April 2019. As per review, it was known that there were 9 finding identified, which all had been closed on 30 April 2019. Follow up of finding, as well as correction evidence of specific finding are presented in document Form No. FR-GEN-005 (Rev. 08).
- **BST Cooperative:** RSPO Internal audit in BST Cooperative Estate is presented in document No. FRM-GEN-024 (Rev. 03) dated 08 April 2019. As per review, it was known that there were 9 finding identified, which all had been closed on 30 April 2019. Follow up of finding, as well as correction evidence of specific finding are presented in document Form No. FR-GEN-005 (Rev. 08).

### 4.1.4

Procedure of FFB purchasing is presented in document No. 001/TBS-SOP/VIII/2015 dated 10 August 2015, which mentioned that FFB suppliers should declare and give a guarantee that FFB delivered were came from their owned estates and not from forest area or illegal sources. Furthermore, rules of FFB supply has also presented in work agreement which covers FFB payment, FFB transportation and administration, FFB quality standard and grading, FFB price, period of agreement, agreement code of conduct, force majeure, dispute, addendum of agreement and other provisions. To ensure all FFB suppliers has comply with procedure, CH management has conducting field crosscheck and verification through direct survey. The survey has informed supplier estate location, GPS Coordinate and palm profiles.

AMP Mill has classified FFB Sources for period 2019 as follows:

#### **RSPO Certified Sources – Under Scope of CH AMP Mill)**

- PT AMP Plantation: AMP 1 Estate, AMP 2 Estate, APM 3 Estate and AMP 4 Estate.
- PT Perkebunan Anak Negeri Pasaman (PANP): PANP Estate.
- PT Karya Agung Megah Utama (KAMU): KAMU Estate.
- PT Primatama Mulia Jaya (PMJ): PMJ Estate.
- Smallholder Cooperative Tompek Tapih Kandis (TTK).
- Smallholder Cooperative Mutiara Sawit Jaya (MSJ).
- Smallholder Cooperative Bukit Sanding Tigo (BST).
- Smallholder Cooperative Agro Wira Masang (AWM).

#### **RSPO Certified Sources – Under Wilmar International, Ltd. Subsidiary**

- PT Permata Hijau Pasaman 1 (PHP 1).

#### **RSPO Non-Certified Sources**

- Manggopoh Cooperative (MG 1and MG 2)
- Yayasan Tanjung Manggopoh (YTM)
- Cooperative Lembah Subur (AMP III Plasma)
- PMJ Plasma Damai Sejahtera I
- AMP III Plasma Damai Sejahtera II

- PHP I Plasma
- Independent Smallholder Gersindo Minang Plantation (GMP).
- Independent Smallholder Sinar Permata Siak (Ade, Adis, MI, Netty, Rezky, Ronald, SHM, Yurni, Cessya, Irma, Inneka, RSL, RB, OSBA and ZK).
- Independent Smallholder AMP (Adityawarman, Ade Suasman, MI, MA, OSBA, RSL and TB)

**Status: Comply**

### 4.2

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

#### 4.2.1

Procedure related to soil fertility is presented in document No. PRO-EST-008 dated 01 July 2013 about leaf and soil analysis; No. SOP-EST-001 (Rev. 04) dated 12 February 2015 about manuring; and No. SOP-EST-010 (Rev. 00) dated 01 April 2011 about EFB mulching. Procedure mentioned that type of fertilizer, dosage, frequency of application shall be recommended by Agronomist team from Research and Development Department of PT Tania Selatan in Palembang (Wilmar Group).

Treatment of soil fertility is specific as describes in soil survey results, which conducted by Param Soil Survey on May 2008. Meanwhile, type analysis for TTK Cooperative and BST Cooperative are conducted by R&D, presented in Map Ref. No. HD4010 dated 31 April 2015 and No. HD4732 dated 22 April 2015, respectively. Based on field observation, it was known that estate management has implementing several method which aims to enhance soil fertility, for example manuring as seen in Blok 24 A/B AMP 2 Estate, EFB application as seen in Block 22/23 E AMP 1 Estate, Land (POME) Application as seen in Block 8 AMP 1 Estate. Especially for peat area, estate management has implementing field drain installation, water level monitoring, water table monitoring and peat subsidence measurement.

#### 4.2.2

The CH has monitor the used of fertilizers and satisfactory documented. Uses of fertilizers coverage in 2019 (ha) is summarized as follows:

- AMP2 Estate: 20,045 mt of RP (dosage 1.5 kg/palm) has been completed on January 2019; 56,812.00 mt of RP (dosage 1.50 kg/palm) has been completed on February 2019; 38,430 mt of NPK (dosage 0.75 kg/palm) has been completed on march 2019; 234,440 mt of NPK Super (dosage 2.50 kg/palm) has been completed on February 2019.
- PMJ Estate: 365.45 mt of NPK Super (dosage 2.25-2.50 kg/palm) has been completed on March 2019; 89.45 mt Kieserite (dosage 1.00 kg/palm) has been completed on April 2019. Furthermore, application of CuSO<sub>4</sub> and ZnSO<sub>4</sub>; Urea; MOP; RP; and NPK S will be conducted on May, June, July, August and September/October, respectively.
- The CH shows program of fertilizer application for period 2019, which informed type of fertilizers, dosage per palm and time of application. Among fertilizer recommended are NPK, NPK Super, Dolomite, Kieserite, Boratae, Urea, MOP and RP. However, Cooperative management decide to not implementing manuring program due to cost reason.

#### 4.2.3

Procedure of leaf and soil sampling is presented in document No. PRO-EST-008 dated 01 July 2013. Results of leaf and soil sampling was used as reference for annual manuring recommendation. Leaf and soil laboratory testing works is conducted by Ecological Management Unit (EMU) R&D Laboratory Wilmar International Plantation in Central Kalimantan Project (CKP). Soil testing laboratory analysis is also conducted by Soil Department of Andalas University in Padang. Analysis of leaf and soil sampling results for annual manuring recommendation is conducted by Agronomist team from Research and Development Department of PT Tania Selatan in Palembang. Estate management is able to shows soil and leaf sampling analysis documents, as follows:

- **AMP 2 Estate:** Leaf and soil analysis is presented in document No. 09/BAHAN TANAMAN/III/2018/AMP dated 02 March 2018 and document No. 07/Tanah/VI/2015/AMP dated 09 September 2015, respectively.
- **PMJ Estate:** Leaf and soil analysis is presented in document No.34/BAHAN TANAMAN/IV/2018/PMJ dated 20 June 2018 and document No. 049/PSIT/ATA/2018 dated 21 March 2018, respectively.
- **TTK Cooperative:** Leaf and soil analysis is presented in document No. 09/BAHAN TANAMAN/III/2018/AMP for Plasma I – TTK dated 18 April 2018 and document No. 054/PSIT/ATA/2018 dated 08 March 2018, respectively.
- **BST Cooperative:** Leaf and soil analysis is presented in document No. 09/BAHAN TANAMAN/III/2018/AMP for Plasma IV BST dated 18 April 2018 and document No. 051/PSIT/ATA/2018 dated 08 March 2018, respectively.



Parameters measured on leaf sampling analysis are dry matters content of macro (N, P, K, Mg, Ca) and micro (B, Cu, Zn) nutrients. Meanwhile parameters measured in soil sampling analysis are texture, density, pH, permeability class, pH, C-Organic, N-Total, C/N Ratio, Total and Available P, Cation Exchange Capacity (CEC) and nutrient content (Ca, Mg, K, Na, P, K, Fe, Cu, Zn and Mn).

#### 4.2.4

Apart from chemical fertilizer application, CH estate management has also implementing by-products application such as empty fruit bunches (EFB) mulching and palm oil mill effluent (POME) or land application as nutrition cycle strategy which aims to enhance soil fertility on the field. Dosage recommended for EFB mulching in immature and mature area are 25 ton EFB/ha/year and 40 ton EFB/ha/year, respectively. Up to March 2019, 5,246.40 mt of EFB had been mulched on 179.85 ha in AMP 2 Estate. However, there is no EFB mulching on the rest sampled estates. As observed to Block 22/23 E AMP 1 Estate, it was known that EFB application has been implemented on immature area (planted in 2018), mulched on the palm circle, with dosage 25 ton EFB/ha/year. Furthermore, as observed to Block 8 AMP 1 Estate, it was known that land application has properly applied on the permitted blocks, and there were no leakage on the field.

**Status: Comply**

### 4.3

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

#### 4.3.1

AMP 2 and PMJ Estate has soil map which derived from Semi Detail Soil Survey Report which conducted by Param Agricultural Soil Survey, Sdn. Bhd. in May 2008. Furthermore, Soil Map for TTK Cooperative and BST Cooperative are derived from R&D report, which presented in Map Ref. No. HD4010 dated 31 April 2015 and No. HD4732 dated 22 April 2015, respectively. All soil map are available in proper scale (1:50,000). Based on reference document review, as well as field observation to the sampled estates, it could be concluded that there is no fragile soils within sampled estates operational areas. However, there were several limitations on soil management, such as drainage problem (prone to flood area), loamy texture, prone to moisture stress and yield fluctuation, soil erosion on steeper slopes, low fertility, leaning palms on peat area and a presence of moderately deep to deep organic soils. According to soil map, it was known that there were 833.00 ha (32.40 %) and 1,395.70 ha (98.00 %) of Typic Haplohemist Soil (Organic soil) in AMP 2 Estate and PMJ Estate, respectively. Furthermore, there are no presence of organic soils in TTK and BST Cooperative operational areas.

#### 4.3.2

Based on soil survey analysis, it was known that slope condition in AMP 2 Estate, PMJ Estate, TTK Cooperative Estate and BST Cooperative Estate are dominantly flat to undulating, or ranged between 0° to 6°. Thus, there is no soil management limitation due to hilly to steep area. However, several points in very small area during field observation in TTK Estate were found hilly but, terraced planting pattern already implemented on those particular field. Limitation were mostly due to prone flood area. To overcome this matters estate management has conducting field drains system.

#### 4.3.3

Program of road maintenance is presented in six years longterm management plan and annual budget. Estate management shows several evidence related to road maintenance activities, for example as follows:

- **AMP 2 Estate:** Record of road maintenance activities is presented in document Form No. FRM-EST-039 (Rev. 01). During 2018 AMP 2 Estate management had conducting 91,000 m main road maintenance and 23,000 m collection road maintenance. Road maintenance consist of grading and compaction.
- **PMJ Estate:** Record of road maintenance activities is presented in document Form No. FRM-EST-039 (Rev. 01). During 2019 PMJ Estate management had conducting 9,500 m road graveling, 8,600 m main road maintenance and 7,202 m collection road maintenance.
- **TTK Cooperative :** Record of road maintenance activities is presented in document Form No. FRM-EST-032 (Rev. 00). During 2018 and 2019, TTK Cooperative Estate management had conducting 1,350 m and 200 m road grading and compaction in 2018 and 2019, respectively.
- **BST Cooperative:** Record of road maintenance activities is presented in document Form No. FRM-EST-032 (Rev. 00). During 2018 and 2019, BST Cooperative Estate management had conducting 176,920 m and 149,240 m road graveling in 2018 and 2019, respectively.

According to field overview to all sampled Estate included Smallholder area, it could be concluded that in general road condition during observation were considered satisfactory and easily passable for FFB transportation.

**4.3.4**

Procedure of peat monitoring and management is presented in document No. SOP-EST-008 (Rev. 03) date 16 January 2017. According to soil map analysis, it was known that there is presence on peat (organic) soil in AMP 2 Estate and PMJ Estate which covers about 32.40 % and 98.00 %, respectively. Estate management has conducting monitoring on water level, water table and subsidence. AMP 2 Estate and PMJ Estate management are able to show monitoring record of water level, water table and subsidence pole measurement which conducted periodically as per week, every 2 months and every semester, respectively. Those records were documented in form No. FRM-EST-056 (Rev. 03) and No. FRM-EST-057 (Rev. 03), respectively. According to record, it was known that water level and water table in both estates were varied from 50 to 70 cm. Furthermore, according to peat subsidence record for period 2018, it was known that subsidence rates were varied from 0.00 to 2.00 cm/year. Based on observation to Bund-Off in Block 17 A AMP 2 Estate and Block 18 E and 19 A PMJ Estate, it was known that water level during observation were 50 cm and 65 cm, respectively. Moreover, based on observation to peat subsidence pole which already installed since 2010 in Block 17 B AMP 2 Estate, it was known that subsidence rates were approximately 3.62 cm/year. Furthermore, based on observation to Block 13 C PMJ Estate which already installed since 2012, it was known that subsidence rates were approximately 1.14 cm/year.

**4.3.5**

Based on soil map and replanting program on four sampled estate review, it was known that replanting in peat soil has programmed in AMP 2 Estate and PMJ Estate. According to replanting progress, it was known that replanting realization in AMP 2 Estate is in accordance with the program and will be continued on July 2019. Furthermore, replanting in PMJ will be started on 2024. Estate management shows drainability assessment which presented in Levelling Survey Report Ref. No. 014/GIS/Survey/HO/2009 December 2009 and Ref. No. 021/GIS/Survey/HO/2010 May 2010 for PT AMP (scope: AMP 1, AMP 2 and AMP 3) and PT PMJ (scope: AMP4 and PMJ), respectively. Summary of study is summarized as follows:

- To continue research and study on water flows direction/movement which aims for normalization.
- Water management system, as well as monitoring of water level and peat subsidencies.
- To identify effect on prone flooded area.
- To further identify on prone to erosion, especially on riparian zone of Masang Kanan River.

**4.3.6**

According to soil survey review, it was known that there is no presence of fragile soil. However, there is presence of marginal soil which leads to several limitations on oil palm cultivation such as shallow organic soil, sandy soil, low fertility, flooded area, etc. To overcome such limitation, estate management has strategy which already implemented, as follows:

- Soil monitoring and mitigation: cover crop establishment, terracing on hilly area, proper frond stacking, EFB application.
- Good fertilizer program as recommended by Agronomist through leaf and soil sampling analysis.
- Initial drainage and delayed planting, compaction along planting line and adopting hole in hole planting.
- Additional fertilizer including Cu, Zn and B.
- Soil moisture conservation.
- Erosion mitigation through planting of vetiver grass, selective weeding and establishing riparian zone.

	<b>Status: Comply</b>	
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**4.4**
**Practices maintain the quality and availability of surface and ground water.**
**4.4.1**

Water sources identification and management plan are listed on 2019 water management document. These documents describe the water source identification, POM and estates water usage monitoring & efficiency, and riparian area protections.

Company also conducted regularly water quality testing every semester for Masang Kanan and Masang Kiri river. Based on workers' interview and field visit on AMP2 and PMJ estate found that drinking water for workers originated from depot water, besides that AMP POM also provides clean water access for all workers.

Field visits on block 1C div 1 (Masang Kanan riparian) at AMP 2 estates and block 2 tompek Tapis Kandi cooperatives found that companies managed Masang Kanan and Masang Kiri riparian by marked the buffer zone (throughout 50 m both sides on riparian), perform revegetation with acacia, and signboard placement for zero chemical activity. There are no indications of chemical activities (spraying) on both riparian areas.

**4.4.2**



Company has identified and shown the maps for catchment areas (including riparian) on 1:35000 scale. HCV identification document shown there is some river flow on AMP and tompek Tapian kandis cooperatives estate such as masang kanan and masang kiri river.

Company provided procedures for these catchment areas protection/conservations listed on SOP-GEN-018. Field visit during audit, for examples on masang kanan and masang kiri riparian acquired information that company shown proper ways for maintain and protect the catchment area for example manual weeding and marking the chemical boundary border. Based on field observation on Tompek Tapian Kandis cooperatives found replanting activities has not yet undertaken on riparian areas, regarding this company are encourage riparian protection on plasma areas based on current procedures. **OFI**

#### 4.4.3

Mill effluent produced by AMP POM processed at waste water treatment plan based on procedure SOP-MILL-014, until it complying to standards before it discharged to AMP-1 estates as land applications based on decree of Capital investment and integrated licensed Agam regent No. 01 on on April 6 2018

Waste water quality testing document review shown for November 2018 - March 2019 all of waste water testing parameters are compliant to the standards quality, and all of waste water management and monitoring has been reported to related institutions for regular basis per 3 month. Field visit on effluent pond during audit found there is no leakage indications and these area are managed well.

#### 4.4.4

Water usage monitoring was done periodically and recorded, for example on April 2019 FFB processed 32705 mt, process water usage 11557 m<sup>3</sup>, and water usage efficacy was 0,35 m<sup>3</sup>/mt FFB processed.

Observations on AMP POM water treatment plant found monitoring for raw and process water usage was done by officer periodically, flowmeters at inlet/outlet serves normally and has been calibrated regularly. Standards of water usage for FFB process recorded on 2019 budget projected 0.645 m<sup>3</sup>/tonne FFB processed, and besides that company also has surface water utilization permit based on Sumatera Barat Governor decree No SK No. 611-441-2016.

**Status: Comply**

#### 4.5

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

##### 4.5.1

The CH has committed to implement integrated pest management (IPM) which presented in several document, asfollows:

- Document No. PRO-EST-004 (Rev. 00) dated 01 May 2010 about field upkeep.
- Document No. PRO-EST-006 (Rev. 02) dated 15 October 2012 about pesticide application.
- Document No. PRO-EST-007 (Rev. 00) dated 02 January 2011 about pest and disease management.
- Document No. SOP-EST-002 (Rev. 03) dated 25 April 2017 about circle and path spraying.
- Document No. SOP-EST-003 (Rev. 01) dated 02 May 2011 about selective weeding.
- Document No. SOP-EST-005 (Rev. 00) dated 01 May 2012 about monitoring P&D attack/incidence.
- Document No. SOP-EST-006 (Rev. 02) dated 10 November 2012 about weeds control.
- Document No. SOP-EST-009 (Rev. 00) dated 01 April 2011 about safety pesticide application.
- Document No. SOP-EST-018 to No. SOP-EST-024 about pests and diseases management control for specific pest and/or disease.

The estate management has a program of integrated pest management and its realization which presented in monthly report, for example as follows:

##### **Early Warning System (EWS) and Census Analysis**

- Summary EWS period 1 2019 in AMP 2 Estate is presented in document No. 1/Staf-AMP/Int/II-2019 dated 11 February 2019. The report informed that incidence of leaf eating caterpillar, termites, rhino-beetle and rats were still under threshold limit (<5 % and <1 % for termites). However, there is incidence of ganoderma reported more than 5 %, which varied from 5.01 to 45.32 %, where identified in 14 Blocks. Holing and application of Pro Palm C (PPC), abiofungicide with dosage 500 cc/hole is recommended to overcome the outbreaks. Recommendation is presented in Form No. FRM-EST-062 dated 11 February 2019. Estate management informed that PPC is a biological fungicide, made from a treated Ganoderma fungus extract spores which still under evaluation. Moreover, chipping and felling was still implemented in other Ganoderma incidence area.

- Summary census in PT PMJ (under AMP 4) dated 29 February 2019 informed that there was termites attack for 1.73 %. Thus, fipronil is recommended to overcome this situation.
- Summary census EWS period 1 2019 in TTK Cooperative Estate is presented in document No. 1/Staf-AMP/Int/II-2019 dated 26 April 2019. The report informed that incidence of leaf eating caterpillar, termites, rhino-beetle, rats and ganoderma were still under threshold limit. Hence, there is no pesticide application in May 2019, unless for weeding control.
- Summary EWS period 1 2019 in BST Cooperative Estate is presented in document No. 4/Staf-AMP/Int/II-2019 dated 12 January 2019. The report informed that incidence of leaf eating caterpillar, termites, rhino-beetle and rats were still under threshold limit. However, there is incidence of ganoderma reported more than 5 %, which varied from 6.38 to 9.64 %, where identified in 3 Blocks. Holing and application of PPC with dosage 500 cc/hole is recommended to overcome the outbreaks. Recommendation is presented in Form No. FRM-EST-062 dated 12 January 2019.

#### **Biological Method for Pest Population Control**

- The CH has conducting beneficial plants for leaf eating caterpillar and bagworm population control. This is confirmed during field observation along main-road and collection road. Furthermore, there is hand-picking of pupa (*Kokon*) as observed in Block 20 D PMJ Estate.
- The CH has adopting barn owl (*Tyto alba*) for rat population control. Based on observation to Barn Owl Box in Block 20 C AMP 2 Estate and Block 18 C/E PMJ Estate, it was found a *Tyto alba*.
- The CH has also adopting Pheromone trap for Rhino beetle (*Oryctes rhinoceros*) population control, especially on surrounded replanting Block areas. This is confirmed during field observation to Block 4 A/B TTK Cooperative Estate.

In order to avoid P&D (include weeds) resistance and prophylactic uses of pesticide, estate management had substitute and/or rotate the use of pesticides for the same target, for example, in term of broad leaf control such as *Ageratum conyzoides*, *Boreiva alata* and *Mikania micranta*, the use of Tiara 20 WG (Methyl Metsulfuron) could be substitute with Glinat 150 SL (Ammonium Glufosinat) or Garlon 670 EC (Triclophyr Butoksi Ester).

#### **4.5.2**

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

- Training of early warning system, P&D introduction, census and pest management in AMP 2 Estate has conducted in 16 November 2018, attended by 23 participants from AMP Estates, TTK Cooperative and BST Cooperative.
- Training of safe environment pesticide application in AMP 2 Estate has conducted in 27 February 2019 and 15 April 2019, attended by 13 pesticide applicators.
- Training of early warning system, P&D introduction, census and pest management in PMJ Estate has conducted in 11 May 2019, attended by 2 P&D workers.

Based on field observation and interview with Foreman and Pesticide Applicators in Block 15 A/B AMP 2 Estate, Block 14 B PMJ Estate, Block 3 A/B TTK Cooperative Estate and Block 1 B BST Cooperative Estate, it could be concluded that the workers were able to explain and demonstrate its job in accordance with the SOP, such as justification of pesticide usage, considering wind flows during spraying, pesticide mixing, pesticides and its target, prohibited areas to be sprayed (for example conservation area and riparian zone, which were marked with yellow mark on the palm trunks), PPE's to be used, as well as its management. Pesticide applicators has also mentioned that pregnant and breastfeeding women are strictly prohibited to works related with agrochemicals.

<b>Status: Comply</b>
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#### **4.6**

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

##### **4.6.1**

Procedures related to pest and disease management as mentioned in Indicator 4.5.1 has mentioned that the use of agrochemical should be based on census analysis evaluation when the level of incidence is more than threshold limits. In order to avoid P&D (include weeds) resistance and prophylactic uses of pesticide, estate management had substitute and/or rotate the use of pesticides for the same target, for example, in term of broad leaf control such as *Ageratum conyzoides*, *Boreiva alata* and *Mikania micranta*, the use of Tiara 20 WG (Methyl Metsulfuron) could be substitute with Glinat 150 SL (Ammonium Glufosinat) or Garlon 670 EC (Triclophyr Butoksi Ester).

According to observation to agrochemicals warehouse and record of pesticide application, list of pesticide used in 2018/2019, it was known that there were 6 type of herbicides and 1 insecticide. All pesticides used above were listed in [www.pestisida.id](http://www.pestisida.id) by Department of Agriculture, Republic of Indonesia. Unit management stated that justification of pesticide uses shall be based on census analysis. For example, according to census of termites in PMJ Estate dated 29 February 2019, it was known that there was termite attack for 1.73 %. Thus, fipronil is recommended to overcome this situation. Based on field observation and interview with Foreman and Pesticide Applicators in Block 15 A/B AMP 2 Estate, Block 14 B PMJ Estate, Block 3 A/B TTK Cooperative Estate and Block 1 B BST Cooperative Estate, it could be concluded that the workers were able to explain and demonstrate its job in accordance with the SOP, such as justification of pesticide usage, considering wind flows during spraying, pesticide mixing, pesticides and its target, prohibited areas to be sprayed (for example conservation area and riparian zone, which were marked with yellow mark on the palm trunks), PPE's to be used, as well as its management. Pesticide applicators has also mentioned that pregnant and breastfeeding women are strictly prohibited to works related with agrochemicals.

#### 4.6.2

Record of pesticide applied is presented in document of "Recor of Pesticide Used on Applied Area", for example, application in March 2019 is presented as follows:

Pesticide	LD-50	AMP 2 Estate		PMJ Estate	
		(l or kg)	(as/ha)*	(l or kg)	(as/ha)*
Garlon 670 EC	710 mg/kg	2.00	0.67	-	-
Glimax 480 SL	>2,000 mg/kg	104.00	0.81	114.00	0.55
Tiara 20 WG	>5,000 mg/kg	42.25	0.13	17.00	0.01
Becano	>2,000 mg/kg	3.00	0.00	-	-
Glinat 150 SL	>5,000 mg/kg	7.60	0.23	-	-
Regent 50 SC	92 mg/kg	-	-	90.00	1.20

(Note: as: active substance)

Pesticide	LD-50	TTK Estate		BST Estate	
		(l or kg)	(as/ha)*	(l or kg)	(as/ha)*
Glimax 480 SL	>2,000 mg/kg	294.00	0.93	178.50	0.92
Tiara 20 WG	>5,000 mg/kg	197.00	0.26	12.80	0.03

(Note: as: active substance)

#### 4.6.3

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

##### Early Warning System (EWS) and Census Analysis

- Summary EWS period 1 2019 in AMP 2 Estate is presented in document No. 1/Staf-AMP/Int/II-2019 dated 11 February 2019. The report informed that incidence of leaf eating caterpillar, termites, rhino-beetle and rats were still under threshold limit (<5 % and <1 % for termites). However, there is incidence of ganoderma reported more than 5 %, which varied from 5.01 to 45.32 %, where identified in 14 Blocks. Holing and application of Pro Palm C (PPC), abiofungicide with dosage 500 cc/hole is recommended to overcome the outbreaks. Recommendation is presented in Form No. FRM-EST-062 dated 11 February 2019. Estate management informed that PPC is a biological fungicide, made from a treated Ganoderma fungus extract spores which still under evaluation. Moreover, chipping and felling was still implemented in other Ganoderma incidence area.
- Summary census in PT PMJ (under AMP 4) dated 29 February 2019 informed that there was termites attack for 1.73 %. Thus, fipronil is recommended to overcome this situation.
- Summary census EWS period 1 2019 in TTK Cooperative Estate is presented in document No. 1/Staf-AMP/Int/II-2019 dated 26 April 2019. The report informed that incidence of leaf eating caterpillar, termites, rhino-beetle, rats and ganoderma were still under threshold limit. Hence, there is no pesticide application in May 2019, unless for weeding control.
- Summary EWS period 1 2019 in BST Cooperative Estate is presented in document No. 4/Staf-AMP/Int/II-2019 dated 12 January 2019. The report informed that incidence of leaf eating caterpillar, termites, rhino-beetle and rats were still under threshold limit. However, there is incidence of ganoderma reported more than 5 %, which varied from 6.38 to 9.64 %, where identified in 3 Blocks. Holing and application of PPC with dosage 500 cc/hole is recommended to

overcome the outbreaks. Recommendation is presented in Form No. FRM-EST-062 dated 12 January 2019.

#### Biological Method for Pest Population Control

- The CH has conducting beneficial plants for leaf eating caterpillar and bagworm population control. This in confirmed during field observation along mainroad and collection road. Furthermore, there is hand-picking of pupa (*Kokon*) as observed in Block 20 D PMJ Estate.
- The CH has adopting barn owl (*Tyto alba*) for rat population control. Based on observation to Barn Owl Box in Block 20 C AMP 2 Estate and Block 18 C/E PMJ Estate, it was found a *Tyto alba*.
- The CH has also adopting Pheromone trap for Rhino beetle (*Oryctes rhinoceros*) population control, especially on surrounded replanting Block areas. This is confirmed during field observation to Block 4 A/B TTK Cooperative Estate.

In order to avoid P&D (include weeds) resistance and prophylactic uses of pesticide, estate management had substitute and/or rotate the use of pesticides for the same target, for example, in term of broad leaf control such as *Ageratum conyzoides*, *Boreiva alata* and *Mikania micranta*, the use of Tiara 20 WG (Methyl Metsulfuron) could be substitute with Glinat 150 SL (Ammonium Glufosinat) or Garlon 670 EC (Triclophyr Butoksi Ester).

#### 4.6.4

CH commitment on reduction of World Health Organization (WHO) Pesticides category Class 1A and 1B is presented Policy of No Deforestation, No Peat And No Exploitation dated 05 December 2013, which mentioned that the use of pesticides categorized by WHO Class 1A or 1B, or as set forth in the Stockholm or Rotterdam conventions shall not be used unless under certain circumstances or emergency conditions. Furthermore, Paraquat is strictly prohibited to be used in Wilmar operational area. Based on pesticide used records in 2018/2019 in all sampled estates as mentioned in Indicator 4.6.1 and 4.6.2, it could be concluded that there is no pesticides listed in WHO Appendix 1A, 1B and/or listed in Stockholm or Rotterdam Convention as well as paraquat. Moreover, all pesticides used by the CH were listed on [www.pestisida.id](http://www.pestisida.id) by Department of Agriculture, Republic of Indonesia.

#### 4.6.5

Based on the results of interviews with pesticide applicators in the field, it is known that workers have understood the mechanism of handling and application of pesticides in accordance with their procedures because each year the company carries out refreshment training for the use of pesticide. In the training provided, the company explained about the procedures for the use of pesticides properly including those related to the use of doses, understanding of active ingredients, spray techniques and others. In addition, workers have understood their respective duties and responsibilities.

The company has a warehouse for PPE storage specifically for spray officers, where the storage functions as a cleaning / washing PPE after use, a PPE drying station, and PPE storage to prevent PPE after workers take home and facilitate the control of PPE. Based on observations on spray work it is known that the PPE used is in accordance with the identification and analysis of risks determined by the company such as: face shields, masks, aprons, rubber gloves and boots.

#### 4.6.6

Procedure of pesticide and used pesticide containers storage is presented in document No. SOP-EHS-007 (Rev. 02) dated 23 April 2015. Pesticide should be placed on chemical storage, while used pesticide containers shall be delivered and placed in the permitted Hazardous Material Store, and prohibit to be use for household purposes, unless reuse for related pesticide application activities. Used containers has been managed as refers to PP No. 101 in 2014. Based on observation to Hazardous Waste Store in all sampled estates, it was known that used pesticide containers were placed properly and delivered to the permitted collector (PT Shali Riau Lestari). Furthermore, as observed on employees housing complex area, it was known that there is no reuse of used pesticide containers for household purposes, plant pot and water containers. Detail on used pesticide containers record is presented in Indicator 5.3.2.

#### 4.6.7

Work instruction on pesticide application has follows technique presented in Material Safety Data Sheet (MSDS) of pesticide products, Procedure No. PRO-GEN-013 (Rev. 02) dated 01 October 2013 about hazardous materials handling, No. PRO-EST-006 (Rev. 02) dated 15 October 2012 about pesticide application and No. SOP-EST-009 (Rev. 00) dated 01 April 2011 about safety pesticide application, and Hazard Identification Risk Assessment Control (HIRAC) for estate. All reference mentioned in the former has covers guideline of storage and handling of pesticides, handling of accident and



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

The Company has conducting several trainings which aims to maintain workers knowledge and skills towards safe pesticide application, for example training on safe environment pesticide application in AMP 2 Estate has been conducted in 27 February 2019 and 15 April 2019, attended by 13 pesticide applicators, while in PMJ Estate has been conducted in 11 May 2019, attended by all related workers. Based on field observation and interview with Foreman and Pesticide Applicators in Block 15 A/B AMP 2 Estate, Block 14 B PMJ Estate, Block 3 A/B TTK Cooperative Estate and Block 1 B BST Cooperative Estate, it could be concluded that the workers were able to explain and demonstrate its job in accordance with the SOP, such as justification of pesticide usage, considering wind flows during spraying, pesticide mixing, pesticides and its target, prohibited areas to be sprayed (for example conservation area and riparian zone, which were marked with yellow paint on the palm trunks) as well as PPE's to be used and its management. Pesticide applicators has also mentioned that pregnant and breastfeeding women are strictly prohibited to works related with agrochemicals. Furthermore, based on field observation to Pesticides Warehouse in all sampled estates, it was found that all MSDS were available and match with pesticide stocks, symbols of risk and hazardous level were displayed properly. Furthermore there are special palce used for pesticide mixing and PPE's place in both estates. Moreover, based on observation to employees housing complex area, it was known that there is no reuse of used pesticide containers for household purposes.

#### 4.6.8

Based on information from CH unit management, surrounding communities and Government Institutions of Agam Regency, it was known that there is no aerial pesticide application in PT AMP and all smallholders areas. All pesticides were applied manually through spraying.

#### 4.6.9

The company has a mechanism / flow chart for handling pesticides for workers who are in the chemical / pesticide warehouse, PPE storage area, work tools and washing. In addition, the company has MSDS for each pesticide that explains the procedures for handling pesticides according to the type and active ingredients used. Based on the observations at the location of the chemical warehouse / pesticide and the storage area for spray PPE it is known that the company has a mechanism / chart for handling pesticides available to workers and the presence of MSDS for each type of pesticide available is well available.

The company routinely provides training on handling pesticides to all applicators in each unit. The following is a recording of the training carried out by the company to the pesticides applicator in each unit, including:

- Technical Training and OHS Spraying Training at AMP 2 Estate on 12 February 2019 which was attended by 27 participants
- Technical Training and OHS Spraying at PT Primatama Mulia Jaya on 05 March 2019 which was attended by 17 participants
- Technical Training and OHS Spraying Training at Bukit Sandiang Tigo Cooperative on 22 April 2019 which was attended by 31 participants
- Technical Training and OHS Spraying Training at Tompek Tapian Kandis Cooperative on 15 January 2019 which was attended by 16 participants

Based on the results of interviews with spray officers at AMP-2 Estate, PT PMJ, Tompek Tapian Kandis Cooperative and Bukit Sandiang Tigo, it is known that workers know well the pesticides handling techniques according to the type and active ingredients along with first aid in the event of exposure to materials of pesticides.

#### 4.6.10

Company possess procedure for Toxic and Hazardous waste including ex agrochemicals management listed on SOP-GEN-005. These procedure stated that all ex chemicals containers were kept on temporary hazardous storage at mill/estates. Training for workers and staff regarding hazardous & toxic material handling have been conducted on June 2018 for AMP-2 and October 2018 fo PMJ and cooperatives workers.

Based on interview with sprayer team found that workers recognized how to properly disposed waste materials and workers have been trained by company about waste and hazardous materials handling. Field visit during audit on toxic & hazardous waste storage on AMP-2 and PMJ estate found company showed proper ways for ex agrochemical disposal. Monitoring evidence for agrochemical usage and ex agrochemicals container stored in storage are available and verified

by auditors.

#### 4.6.11

The company shows the document of the Periodical Health Check Report of PT AMP Plantation April 2019 in collaboration with the Sumatra Selatan Provincial Manpower and Transmigration Office. Examination includes cholinesterase examination on 10-11 April 2019. The results of Cholinesterase in serum blood as follows:

- Cholinestrace examination for 65 workers from PT Primatama Mulia Jaya
- Cholinestrace examination for 6 workers from Bukit Sandiang Tigo Cooperative
- Cholinestrace examination for 10 workers from the Tompek Tapani Kandis Cooperative
- Cholinestrace examination for 77 workers from AMP-2 Estate and AMP POM

From the results of the examination it is known that all workers are in good health and there is no increase in the content of cholinesterase in the blood. If there is a result of a medical examination that has a problem or becomes a note from a doctor, the company will conduct a more specific re-examination in accordance with the disturbance.

#### 4.6.12

The company has Internal Memorandum 54 / Mem-GEM / Int / VII / 2010 dated June 27, 2010 concerning Prohibition of the Work of Spraying and Fertilizing for Pregnant and Lactating Women, which include workers who are pregnant and lactating women who according to doctors' information are harmful to their health and their contents are prohibited carry out spraying and fertilizing work or work related to chemicals and transferred to other work not related to chemicals. The company has a policy to carry out prenatal checks on all female workers who work with jobs related to chemicals. This is done so that no workers who are pregnant and breastfeeding work in jobs related to chemicals. The following are the results of the last inspection conducted by the company, including:

- Pregnancy checks at the PT AMP Plantation Clinic in April 2019 with a total of 53 female workers and the results of the examination stated that all female workers examined were declared not pregnant.
- Pregnancy examinations at the PT Primatama Mulia Jaya Clinic in April 2019 with a total of 48 female workers and the results of the examination stated that all female workers examined were declared not pregnant.

Based on the results of field visits and interviews with spray and fertilizer workers in the company, it is known that at present there are no workers who are pregnant and breastfeeding who work in these activities, this is because the company routinely checks pregnancies which function to identify pregnant women. Workers also know clearly that female workers who are pregnant and breastfeeding are not permitted to work in chemicals-related work, if there are workers who are pregnant it will be immediately moved for work that is lighter and not related to chemicals.

**Status: Comply**

#### 4.7

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

##### 4.7.1

The CH has commitment towards occupational health and safety which presented in document OSH Policy No. POL-GEN-008 (Rev. 2) which issued by Country Head on 22 May 2015. The policy mentioned that the company is committed to provide a safety working environment to all employees and make effort to protect all workers and company assets from accident and damages. The company shall implementing procedure which in accordance with applicable regulation that aims to minimize all risk affecting safety and health. Furthermore, the cooperation with all workers shall be carried out in OSH implementation. Meanwhile, OSH policy for smallholders is presented in OSH Policy dated 05 January 2015. The content of policy were almost the same with Inti Estate policy. OSH program for Inti and Plasma for period 2019 are same, which consist of 8 main program, related to OSH regulation compliance, OSH committee (P2K3), OSH implementation (control, management and campaign), training, fire management system, OSH monitoring, environment and reporting. Effectiveness of program is monitored every month on OSH meeting and evaluate quarterly.

Socialization of policy had conducted in all estate and smallholders firstly on 22 May 2015, and delivered regularly every year. Socialization has also conducted through OSH signboard installation on the Office, field and processing stations, as observed to all sampled estates and mill. Furthermore, workers in Mill and Estates informed that CH management has deliver socialization towards safe working practices through training, safety briefing during daily muster morning.

##### 4.7.2



Procedure of Hazard Identification Risk Assessment and Control (HIRAC) is presented in Form No. FRM-GEN-017 (Rev. 05), as follows:

- PT AMP: HIRAC Review No. 10 dated 02 January 2018.
- PT PMJ: HIRAC review No. 07 dated -2 March 2019.
- TTK and BST Cooperative: HIRAC Review No. 03 dated 10 January 2019.

All HIRAC above has been socialized on the date of review, and every day on muster morning. Based on observation and interview with workers in AMP 2 Estate, PMJ Estate, TTK Cooperative Estate and BST Cooperative Estate, it was known that the company has provide personal protective equipments (PPE) for workers, in accordance with risk analysis assessment. For example, PPE for chemicals applicators has refers to material safety data sheet (MSDS) of product. Furthermore, based on observation to chemical store in housing complex area of all sampled estate, it was known that estate management has provide a proper place (building room) for pesticide mixing and storage. MSDS of products and emergency facilities such as alarm, shower, eyewash, first aid kit, fire retardant and suitable hazardous symbols were available onsite.

Record of accident in all estates and mill in the last 1 year are presented in document Form No. FRF-KLK-009 (Rev. 02). Evaluation towards accident was carried out by OSH Committee Secretary through monthly meeting, describes in detail on quarter P2K3 report. Furthermore, CH management is able to shows medical record testing on cholinesterase, spirometry and audiometri, which conducted by Manpower and Transmigration Agency of Sumatera Barat, *UPTD Balai Hiperkes dan Keselamatan Kerja*, summarized as follows:

- Spirometry testing has conducted on 17-19 September 2018 to 80 workers of PT AMP has resulting all workers checked were normal.
- Audiometry testing has conducted on 27-29 September 2018 to 94 workers of PT AMP has resulting 90 workers were normal while 4 workers were indicates reduction on hearing capacity. Follow up to Hospital (RSUD) Lubuk Basung on Padang in October 2018 were available and resulted those 4 workers were indicates normal.
- Cholinesterase testing has conducted on 27-29 September 2018 to 102 related agrochemical application workers of PT AMP, 102 workers from PT PMJ 17 workers in TTK Cooperative and 6 workers from BST Cooperative has indicated normal and fit to works which may exposed to chemicals.

#### **4.7.3**

Estates and Mill Management are able to shows monitoring on License or Certificate of Operators, as well as training on obtaining license, for example as follows:

- Letter of Senior Assistant Personal General Affair (PGA) Manager to PT Arpindo Pratama No. 083/PGA-AMP/Ext-XII/2018 dated 20 December 2018 about training for 1 Welder Class III, 1 Fire Fighter Class D, 1 Generator Set Operator and for 2 Licenses of OSH Lifting Machinaries (K3 Angkat-angkut). Respon has given by PT Arpindo Pratama on 03 January 2019. Certificate of training for Welder were available dated 12 April 2019. Meanwhile trining for Generator Set Oeprator and Lifting Operator are scheduled to be carried out in June and October 2019, respectively.
- Decree Letter of Competency of Electrical Technicial from PT Sertifikasi Kompetensi Mandiri Kementerian ESDM dated 15 April 2019.
- Licenses for Hoisting Crane Operators, 4 Licenses for Dump Truck Operators, 1 License for Static Crane Operator, 6 Certificates of Welders, etc.
- AMP-2 Estate has 27 Operators with License, which mostly for Tractors, Backhoe Loader and Excavator. Validity of licenses were varied between 16 January 2020 to 12 September 2023.
- PMJ Estate has 17 Operators with License, which mostly for Tractors, Dump Truck and Excavator. Validity of licenses were varied between 16 January 2020 to 12 September 2023.
- TTK Cooperative has 2 Operator with License for Excavator and Tractor.
- BST Cooperative has use operators from AMP Estates.

Record of PPE delivery which presented in document Form No.FRM-GEN-033 (Rev. 03) to all sampled estates and mill during 2019 is available. As reviewed, it could be concluded that PPE distributed were in accordance with HIRAC and/or MSDS for agrochemicals.

However, there are several evidence observed as follows:

- Based on observation to Clarification Station of APM POM, it was found that 2 internship workers were not equipped with earplug as required by Form No. FRM-EHS-009 dated 01 October 2011.
- The company has hazard identification risk analysis and control for all operational activities in the estate and mill, as well as its risk mitigation. However, based on field observation, it was noted several non conformity as follows:
  - As observed on manual field upkeep in Block 3A/B TTK Cooperative and Block 1B BST Cooperative, it was found that the workers were not wearing PPE Gloves.
  - As observed on Weigh Bridge Station and Grading Station in AMP POM, it was found that driver and loading worker of FFB Supplier from *Pemuda Tuah Sakato* Organization were not wearing PPE Safety Boot.
- Based on TTK Estate musterhit dated 08 May 2019 review, it was known that there is no agrochemical application activities in TTK Cooperative. However, based on observation to PPE Store of agrochemical applicators in AMP 1 Estate, the respective PPE were not available on the provided Store.

### NCR No. 2019.01 description:

1. The company is not be able to ensure that all workers (included internship) has equipped with proper and complete PPE as required by HIRAC and Form No. FRM-EHS-009 dated 01 October 2011.
2. The company is not be able to ensure that all PPE has been managed properly as arranged in procedure No. SOP-GEN-017 (Rev. 01) dated 01 October 2013 Point 6.1.1.1 and procedure No. SOP-EST-002 dated 25 April 2017 Point 5.4.3.

### 4.7.4

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

- PT AMP (Estate and Mill), TTK and BST Cooperative were under P2K3 of PT AMP as endorsed by Manpower Agency of Sumatera barat Peovince No. 564/20/P2K3/HI-Was/2018 dated 24 May 2018. The Secretary of P2K3 was an OSH Expert as shows through Minister of Manpower Decree No. KEP. P.1582/NAKER-BINWASK3/VI/2017 dated 05 June 2017, valid for 3 years.
- PT PMJ and AMP 4 were under P2K3 of PT PMJ as endorsed by Manpower Agency of Sumatera barat Peovince No. 564/134/HI-Was/2017 dated 19 June 2017. The Secretary of P2K3 was an OSH Expert as shows through Minister of Manpower Decree No. KEP. P.1579/NAKER-BINWASK3/VI/2017 dated 05 June 2017, valid for 3 years.

Records of OSH monthly meeting was available, for example as follows:

- Last P2K3 meeting for PT AMP included TTK and BST Cooperative has conducted in 05 April 2019, attended by all representative from estate and coopeartive. There is 4 main issues beeing discussed, e.g. PPE socialization, medical check up, work incidence evaluation and employees complaints.
- Last P2K3 meeting for PT PMJ conducted in 11 April 2019, attended by 19 committee members. There is 3 main issues beeing discussed, e.g. review on OSH Plan for the next period, work accident and employees welfare.

Based on interview with OSH committee representatives from PT AMP, PT PMJ and cooperative representatives, it was known that P2K3 meeting has conducted regularly. Minutes of meeting and picture documentation during the meeting were available.

### 4.7.5

CH management mentioned that there is no revision of emergency procedure, which all provided in Bahasa and presented in several documents, as follows:

- Procedure No. PRO-GEN-008 (Rev. 02) dated 01 October 2013 about Identfication Impact towards OSH and Environment Aspect.
- Procedure No. PRO-GEN-014 (Rev. 02) dated 01 October 2013 about Emergency Action, included fire incidence on the estate and mill, as well as housing complex area.
- Procedure No. PRO-GEN-015 (Rev. 02) dated 01 October 2013 about Investigation and Reporting of Accident and Environment Contamination, included trafic of estate operational areas.
- Procedure No. PRO-KLK-002 (Rev. 03) dated 01 October 2013 about Medical Check Up of Employees, included special check up, especially for workers affected/exposed by agrochemicals, high noisy level, pregnant monitoring, etc.
- Procedure No. PRO-KLK-004 (Rev. 01) dated 28 October 2016 about First Aid Training and Monitoring.

The CH has monitor and evaluate any accident on the unit. Report of accident is presented in document Form No. FRM-KLK-009 (Rev. 03), which informed time and location of accident, affected employee (victim) data, type of accident, root of cause, accident category (first aid or Lost Time), Manday(s) lost and other information. Furthermore, incident notification and investigation is presented in document Form No. FRM-GEN-010 (Rev. 03). All sampled Estates and Mil are able to shows accident report, investigation form, medical certificate and doctor recommendation, Hospital Certificate, and BPJS covers, satisfactory. As informed by estate and mill workers, it was known that all accident were covered by the company.

The CH has Hiperkes Certified Paramedics and doctor, i.e. doctor with Hiperkes Certificate No. 13.852/DH-VII/05 dated 25 February 2005 and 5 Paramedics with Certificate No. 14.518/PM-IV/12 dated 05 December 2012; No. 14.544/PM-IV/12 dated 05 December 2012; No. 19.545/PM-IV/15 dated 05 December 2012; No. 21.371/DBK3-PM/10/IV/2016 dated October 2016; and No. 21.372/DBK3-PM/10/IV/2016 dated October 2016. Furthermore, the CH has First Aider as required by Permenakertrans No. 15 in 2008, for example as shows in First Aider with Certificate No. 120/P3K/VI/2016; No. 121/P3K/VI/2016; No. 123/P3K/VI/2016; No. 37/P3K/VI/2016; No. 6/P3K/VI/2016; and No. 27/P3K/VI/2016. All First Aider Certificate were valid until 08 June 2019.

The CH has conducting periodic training on First Aid which presented in document No. FRM-GEN-016 (Rev. 04). For example, training of First Aid and Socialization of Medical Check Up results, HIV AIDS and Drugs has conducted in PT AMP on 22 February 2019 and 25 March 2019, attended by workers from Estates and Cooperatives (Plasma). List of First aid items an dmonitoring is presented in document Form No. FRM-GEN-054 (Rev. 01) . Furthermore, inventory (location) of First Aid is presented in Form No. FRM-GEN-034 (Rev. 03). For example, portable Firt Aid is kepted by 23 Foremans in AMP 2 Estate. Based on observation to Permanent and Portable First Aid Box on the sampled Estates and Mill, it was known that the first aid items were consist of 23 and 13 items, respectively, as recommended by company doctor and refers to Minister of Manpower Regulation No. 15 in 2008.

#### **4.7.6**

Based on the results of the BPJS Health and Employment proof of payment documents, it is known that all workers (permanent workers and contract workers) in the company have been included in the BPJS program as evidenced by monthly payments for each worker, including the April BPJS Health payment 2019 which was paid on 10 April 2019 and the BPJS Employment payment for the period of March 2019 paid on 15 April 2019.

Based on interviews with harvester, fertilizer, spray workers and operators at the factory, it is known that the company has registered all its workers in the BPJS Health and Employment program and the company provides health facilities in the form of clinics as the first treatment place for its workers. in the event of an accident in the area of the company, workers will be treated / given medical assistance first at the company's clinic. If workers cannot be treated medically and need more medical care, the worker will be referred to the nearest hospital to get further services. The entire handling process will be carried out by the company and workers will not incur any costs.

#### **Non-Conformity No. 2019.02**

##### **Evidence observed (filled by auditor):**

Based on the results of a document review, it is known that the company has shown evidence that contractor workers at PT AMP Plantations have been protected under the BPJS Employment program. However, it cannot be shown that contractor workers at PT PMJ have been protected under the BPJS Employment program.

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

The company has not been able to prove that all contractors have been protected by work accident insurance.

#### **4.7.7**

The Company has a Report of Occupational Accident Cases that Are Treated at All Company Clinics Due to Accidents for the period May 2018 as of April 2019 which is a record of work accidents using the LTA (Lost Time Accident) metric. In this report, the date of the incident, the time of occurrence, name, age, class, position / occupation, the body affected, the type of injury, the cause of injury, the location of the accident, the LT / FA category, lost work days and information. In addition there are also records related to the results of accident investigations that have occurred.

Based on the results of a document report on Work Accident Cases Treated at All Company Clinics Due to Accidents for the period May 2018 to April 2019 it is known that currently the number of workplace accidents occurring in the company

is 79 cases with a total loss of 290 working days, so that it can be known that the Severity Rate for the past year is 71.07 and the Frequency Rate for the past year is 19.36.

<b>4.7.3</b> <b>4.7.6</b>	<b>Status:</b> <b>Non-Conformity No. 2019.01 with Major category</b> <b>Non-Conformity No. 2019.02 with Minor category</b>	
<b>4.8</b> <b>All staff, workers, smallholders and contractors are appropriately trained.</b>		
<b>4.8.1 &amp; 4.8.2</b> <p>The company has developed a training program in 2019 for all workers (permanent worker, contract worker and contractor worker) in accordance with RSPO principles and criteria, including:</p> <ul style="list-style-type: none"> <li>• Training in Harvest and Sorting Techniques</li> <li>• Fertilization Engineering Training</li> <li>• Training in Spraying Techniques</li> <li>• Fire Emergency Response Training</li> <li>• First aid training</li> <li>• socialization of HIV / AIDS and Narcotics</li> <li>• Core Value socialization &amp; Company Policy</li> <li>• Job Description socialization and Procedure for Factory Station</li> <li>• OHS &amp; Environmental Socialization</li> <li>• First aid training</li> <li>• Dissemination of Company Policy</li> <li>• PKB socialization</li> <li>• Information on Waste Management</li> <li>• Gender socialization</li> <li>• Etc.</li> </ul> <p>The company has shown documentation related to the realization of training in accordance with a training program that is made for all workers in each unit as follows:</p> <ul style="list-style-type: none"> <li>• The socialization was related to the SOP of Communication, Consultation, Information Services, Receipt of Complaints, Human Rights Policy, Company Code of Ethics and Prohibition of Burning Land on 03 May 2019 in Nagari Bawan which was attended by 7 participants from related stakeholders.</li> <li>• Harvesting &amp; Sorting Techniques Training on 12 February 2019 which was attended by 55 participants</li> <li>• Spraying Techniques Training on 12 February 2019 attended by 27 participants</li> <li>• Fertilization Techniques Training on 11 February 2019 which was attended by 32 participants</li> <li>• Training and outreach related to OSH, gender, HCV, Spraying Technique, Manuring Technique, Harvest Technique, Hazardous Waste Control, HIV / AIDS and Narcotics on 09 June 2018 which was attended by 22 participants who were workers from Bukit Sandiang Tigo Cooperative.</li> </ul> <p>Based on the results of interviews with harvest, fertilizer, spray workers and factory operators it is known that workers have understood their jobs well according to the procedures they have and this is because the company routinely provides training every year. In addition, based on the results of a study of the training recording documents for each worker, it is known that the company has documented the history of training that has been followed by each worker well since the previous years.</p>		
	<b>Status: Comply</b>	
<b>PRINCIPLE #5 Environmental responsibility and conservation of natural resources and biodiversity</b>		
<b>5.1</b> <b>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.</b>		
<b>5.1.1</b>		



AMP-1, AMP-2, AMP-3 estates and AMP mill shown addendum document for DELH 2018, covered activities for 7926.42 ha estates, 80 tonne/hour POM capacity included methane capture plant operations and replanting activities. These documents have environmental permit based on decree Sumatra Barat Governor No. 660-5-2018 on 4 April 2018.

PT PMJ has *dokumen pengelolaan dan pemantauan lingkungan hidup* (DPPL) on 2009 covered 2000 ha estate areas, meanwhile Bukit Sandiang Tigo cooperatives has *dokumen pengelolaan lingkungan hidup* (DPLH) covered 226 ha estate areas and Tompek Tapian Kandis cooperatives also has *dokumen pengelolaan lingkungan hidup* (DPLH) covered 511.18 ha estate areas. There is difference about 0.6 ha between areal statement and covered environmental study areas for Tompek Tapian Kandis cooperatives (511.78 ha vs 511.18 ha), regarding this difference company are encourage to consult with related agency, therefore this matter are becoming **OFI**

These documents explained the impact that probably caused by the company's operations such as land acquisition, construction of roads, infrastructure development, processing mills development, land preparation, crop management, oil palm planting, development, etc. EIA documents also describes environmental management and monitoring plan that should be done by the company.

#### 5.1.2

Since 2014, AMP estates conduct land preparation for replanting activities and company has construct new methane capture plant. Regarding to this, on 2018 PT AMP Plantation established new *dokumen evaluasi lingkungan hidup*. This document has described environmental management and monitoring plan. Furthermore, action plan for replanting activities management for examples related to surface water management, soil fertility, and OHS has been implemented and reported regularly for example on environmental management report semester 2 2018.

#### **Verification on May 9 2019**

Company shown environmental management and monitoring document for MSJ and AWM cooperatives as listed on second semester environmental management and monitoring implementation report. This document has described some parameters regarding environment monitoring and management for AWM and MSJ cooperatives such as :

- Management related to air ambient and noise per semester
- Management related to surface water quality per semester
- Management related to aquatic biota on Masang Kanan River per semester
- Management related to community healthcare per year
- Management related to OHS per semester
- Management related to ground water quality per semester
- Management related to wildlife species per year

Management and monitoring implementation has been reported and listed on environmental management report for example on 2nd semester 2018. Based on this explanation, therefore **NC 2018.01 are closed**

#### 5.1.3

Company are consistently done the environmental management and monitoring as outlined in the Report of the Environmental Management and Monitoring for regular basis. These report described realization of monitoring and management of the environment in accordance with environmental parameters in the RKL/RPL. Public consultation with Environmental agency of Agam indicate that the company has made environmental management and there is no issue of pollution caused by the company's operational activities.

Review for environmental monitoring / management plans have been developed and listed on evaluation chapter on every semester RKL/RPL report, for examples evaluation for AMP estate and POM, semester 2 2018 report shown that company has properly managed and reduced all impact caused by plantation activities.

Results of environmental monitoring for second semester 2 2018 indicates company has done well regarding environmental management, environmental parameter regarding air quality, surface water quality. Some quality are not exceed the relevant standards.

#### **Verification on May 9 2019**

Company shown environmental management and monitoring document for MSJ and AWM cooperatives as listed on second semester environmental management and monitoring implementation report. This document has described some

parameters regarding environment monitoring and management for AWM and MSJ cooperatives such as :

- Monitoring related to air ambient and noise per semester
- Monitoring related to surface water quality per semester
- Monitoring related to aquatic biota on masang kanan river per semester
- Monitoring related to community healthcare per year
- Monitoring related to OHS per semester
- Monitoring related to ground water quality per semester
- Monitoring related to wildlife species per year

Management and monitoring implementation has been reported and listed on environmental management report for example on 2nd semester 2018. Based on this explanation, therefore **NC 2018.02 are closed**

<b>Status: Comply</b>	
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## 5.2

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

### 5.2.1

PT AMP, PT PMJ, and TTK and BST cooperatives estates shown HCV assessment for the entire area of operations which done by the RSPO Approve Assessor on 2010. The process of HCV identification conducted by using HCV identification guides in Indonesia on June 2008.

These identifications indicates there is HCV 1.2, 1.3, 3, 4.2, 4.3 presence on PT AMP covered for 220.51 ha areas and 1.20 ha for TTK cooperatives and 2.51 ha for BST cooperatives. All of indicates HCV areas was mapped by 1:35000 scale and this HCV identifications covered all estates/mill operational areas including surrounding landscape and RTE species. Meanwhile there is HCV attributes or RTE species presence on PT PMJ.

### 5.2.2 and 5.2.3

HCV identification results on 2010 also explain there is an RTE species according IUCN-Redlist namely e.g *asian sun bear* and *tomistoma shcigellii*. PT AMP, PT PMJ, and cooperatives has established HCV management plan 2019 that includes appropriate management and monitoring to maintain HCV attributes and RTE species.

Field visit on HCV areas Block 1A div 1 (AMP-2) and block 2 div 1 (Tompek Tapian kandis cooperatives) shown that company provides HCV areas information signboards and protected species, signboard for hunting ban and marking riparian area that will be rehabilitated for species corridor. Company also conducted a periodically monitoring every month for HCV areas, species monitoring, and wild hunting by HCV officer.

Field visit on Batang alin riparian block 1a div 1 AMP-2 estates shown the condition of catchment areas has been covered by natural vegetation. Interview with spraying team found that them recognized HCV area as a protected area and the they also recognized no chemical applications on conservation areas. Workers also have deep understanding related to protected species, a ban on hunting of protected species.

Related to RTE species, company had RTE species protections procedures SOP-GEN-020 on 2016 stated that all workers including contractors are not allowed to hunt, to raise, and killed all RTE species . Evidence for workforce educations related to RTE species are available and verified by auditors team, for examples on July 2018 for AMP-2 estates and October 2018 for PMJ estates. Housing visit on AMP-2 and PMJ estates found there is no RTE / wild species reared by workers.

To provide protection against such RTE species, management unit has made the hunting ban signboard, patrolling, rehabilitation of riparian as habitat and report to relevant agencies (Nature Conservation Agency). Company also conduct regular inspection for HCV/RTE species protection, last inspection was done on April 2019 indicates there is no wild hunting and no wild animal traps presence on HCV areas.

### 5.2.4

Company have established HCV management plan, and implemented it well. Regularly patrols record shown company



has been monitored illegal fishing, hunting, and other illegal activities. All of records for monthly patrols on each estate are available and verified by auditors. For example patrols summary results for April 2019 on AMP-2 found *macaca fascicularis*, *tyto alba*, and *Amauromis phoenicurus* meanwhile wild species trap is not presence. The result of monitoring also reported to government institution every six month listed on RKL/RPL report. Results of monitoring on 2018 found key RTE species are still presence such as *sinyulong* and *sun bear*. As the results of monitoring 2018 output, company has plan feed back into the management plan 2019 for examples by enhance primer species monitoring and species refugum every month on each estate.

### 5.2.5

Results of the verification documents, field visits and interviews with villagers obtained information that there is no areas of HCV-related and affect to the local community.

**Status: Comply**

### 5.3

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

#### 5.3.1

Registry for waste (included toxic and hazardous waste) products produced from mill and estates are identified and listed on 2017 identification and evaluation of pollution source document for example mill waste water are managed at waste water treatment plant before it distributed as land applications, hazardous waste were kept at temporary hazardous waste storage, empty fruit bunch are reduce and reuse as nutrient cycles on estates.

#### 5.3.2 and 5.3.3

All chemicals and their containers including hazardous waste are disposed responsibly based on procedure SOP- GEN-006 and company also established waste and pollution identification and management 2018.

Inventory for all chemicals usage and it containers are available on chemicals storehouse/ temporary hazardous storage.

All ex chemicals containers were kept on temporary hazardous storage at AMP POM, AMP-1 estate, PMJ estate.

Document review shown that company has sent all toxic and hazardous waste to PT Shali Riau Lestari (licensed collector by decree of national environmental minister No. 879/Menlhk/Setjen/PLB.3/11/2016) on April 2019 (manifest are available and checked by auditors). Observation during audits at temporary hazardous&toxic waste storage shown that all of hazardous waste are compliant with the periods in permit (< 180 days).

All settlements waste are not disposed off using open fire, and company has established procedures related doemstic waste management listed on SOP-GEN-013. Field observation on AMP-2 estates for example found that companies managed settlements/housing domestic waste by provide landfill on each division and sort the organic/an-organic waste. Observations also found these landfill are located far away (> 1 km) from housing and situated on flood free areas.

**Status: Comply**

### 5.4

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

#### 5.4.1

AMP POM has assess and estimated the direct energy use such as fuel usage by transport contractors for 2018-2019 periods. Company shown commitment to reducing fossil fuel by renewable energy usage. Shell and fiber usage have been monitored per month and realization of fossil fuel usage during April 2019 are 24515 litre litre. During Nov 2018-April 2019, fiber and shell usage for boiler resulting average energy efficiency for diesel fuel are 4.34 litre/tonne CPO, for electricity are 93.76 kWh/tonne CPO. Furthermore, AMP POM also has a Methane Capture plant (still in commisioning progress), as a part of waste and renewable energy optimalization.

**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

Zero burning activities for land preparation are listed on procedures PRO-EST-002 and WILMAR Environmental policy related zero buring activities on 2012. Document review and field verification shown that company are not conduct any new development since ASA1.1, replanting acitivites was undertaken in 2018 on AMP-2 estate and on year 2019 on topek tapian kandis cooperatives, regarding this field visit shown land clearing activities for replanting was done mechaniccally without burning activities.

**Status: Comply**
**5.6**
**Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.**
**5.6.1 & 5.6.2**

To reduce pollution and emission, the company has identified the emissions source and the management steps which are described in FRM-GRN-033. In addition, company also identified GHG sources included mitigation plan for reducing it.

All waste including emissions and pollutions sources from Mill and estate are identified and recorded on waste and pollution identification 2018 document. Fossil fuel reducing have been implemented by fiber and shell usage. Realization of renewable energy have been monitored on monthly report for fiber and shell usage. Waste water has been monitored every months and monitoring periods Jan-March 2019 sighted that all of waste water testing parameters is compliant to the standards quality. Meanwhile company also conduct regular air emission and air ambient testing, results of monitoring for semester 2 2018 shown all parameters regarding air quality also comply with relevant standards.

**5.6.3**

Calculation of GHG and its monitoring has conducted by EHS department. GHG emission calculated using RSPO palm GHG calculator v 3.0.1. Summary of GHG emission for AMP POM and its supply base are listed as follows :

Emmision per product	tCO2e/tProduct
CPO	11.02
PK	11.02

Production	t/yr
FFB processed	157869.26
CPO produced	28195.44
PK produced	8272.35

Extraction	%
OER	17.86
KER	5.24

Land use	Ha
Planted area	9739.63
Planted on peat	4717.98
Conservation (non forested)	162.55

**Summary of field emission and Sinks**

Description	Own crop			Group		
	tCO2e	tCO2e/ha	tCO2e/tFFB	tCO2e	tCO2e/ha	tCO2e/tFFB
Emissions Sources						
Land conversion	83133.49	9.72	0.53	426.14	9.88	0.45
CO2 emmisions from fertilizer	6467.3	0.76	0.04	42.29	0.98	0.04
NO2 emissions	37431.39	4.38	0.24	268.03	6.21	0.28
Fuel comsumption	2745.73	0.32	0.02	18.37	0.43	0.02
Peat oxidation	209941.38	24.56	1.33	1726.78	40.02	1.82
Sinks						
Crop sequestration	-80031.5	-9.36	-0.51	-403.92	-9.36	-0.43
Sequestration in Conservation area	0	0	0	0	0	0

Total	259687.79	30.38	1.64	2077.69	48.15	2.19
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### Summary Oil Mill Emissions and Credits

Remarks	tCO <sub>2</sub> e	tCO <sub>2</sub> e/t FFB
Emissions sources		
POME	81038.49	0.2
Fuel consumption	878.37	0
Grid electricity	0	0
Credits		
Export of grid electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	81916.86	0.2

### 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

Based on document review for examples : pesticides usages monitoring, diesel fuel monitoring, HCV identification and etc found that accurate data has been put into the RSPO palm GHG Calculator. Meanwhile this GHG calculation using options No 1 (apply full version).

GHG calculation on 2018 shown net emission of GHG are decreasing compared to 2017 net GHG (11.02 tCO<sub>2</sub>e/t Product vs 11.60 tCO<sub>2</sub>e/t Product), this indicates company has implemented well plan to reduce emission.

**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**

PT AMP, PT PMJ included Bukit Sandiang Tigo cooperatives and Tompek Tapian Kandis has conduct social impact assessment by independent consultant. The scope of study are impact of plantation and mill operation to workers and community surrounding company areas. These assessment also identified negative and positive impact of plantation and mill operation towards social aspect.

Based on document review shown that current SIA and SIA review has describing social impact related vulnerable groups (jobless, elderly people, woman), community perception, environment and health, local economy, customary land rights and land use changes, livestock intrusion by sheperd and etc.

SIA identifications was also done based on affected parties consultation, this matter are amplified by stakeholders e.g Ninik mamak community during stakeholder consultation and besides that based on interview with local community shown that major impacts (regarding customary land rights) has been identified and managed by company

#### **6.1.3 & 6.1.4**

Company has established management plan and monitoring plan related for social impact based on the impact

identification. This plan has been informed the positive and negative impact including management planning time frame and the person in charge for the activity, such as: potential environment pollution, community perception, customary land rights, and workers facilities. PIC for social management and monitoring are personel general affair, manager plasma, staff bina mitra, and community development officer. Review for social management and monitoring plan for PT AMP / PT PMJ was develop on 2019. Major impacts that affect communities from company operations among others are perception regarding CD/CSR, livestock intrusion by sheperds, and workers facilities.

Social monitoring plan were implemented by affected parties participatory for examples thorough discussion and interview on 2019 for nagari bawan, jorong katiagan, jorong tapian kandis, jorong masang nagari tiku v villagers. Documentation of social impact monitoring activities (by interview and discussion) are available for each stakeholders. Interview with representative of local community and villagers obtained information that affected parties surrounding company are participated when SIA review was conducted.

Based on interview with local community found there is no significant impact/issues caused by company because company have effectively implemented social management during 2018.

Result monitoring for social impact on surrounding PT AMP / PT PMJ affected parties periods 2018 shown the main issues that still presence until now is related customary land rights, regarding this as monitoring output PT AMP / PT PMJ has enhanced and regularly develop participatory mapping or conflict resolution programme and company has conduct mediation with local ninik mimik and done compensation for customary rights on 2018.

<b>Status: Comply</b>
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## 6.2

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

### 6.2.1; 6.2.2 & 6.2.3

The company has a Stakeholder List (update 2019). These stakeholders have been grouped, consisting of: Government / Institutions related to Regency, Village & Sub-District Governments, Local Communities, Community Institutions / Organizations, Supplier of Material / Goods Supplies to Companies, External FFB Suppliers and Local Contractors. The company has an SOP to respond to stakeholders well, namely the PRO-BNM-008 Revised SOP 02 dated October 1, 2013 concerning Communication Procedures, Consultation and Coordination with Stakeholders. In the SOP it explains the mechanism for handling stakeholders properly when communicating, consulting and when coordinating.

Based on the results of consultations with the surrounding village community, it is known that the public has learned that the company has set up a Public Speaker on the environmental, CD & CSR aspects that will communicate with the parties regarding company policies and programs. The community and the surrounding village government also know the ways to communicate formally through letters to the company based on information that has been conveyed by the company to the community / village government. During the past year the company's communication relationship with the surrounding community was very good and the company always gave a reply if the village gave a letter / proposal of activities to the company.

<b>Status: Comply</b>
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## 6.3

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

### 6.3.1

The Certificate Holder has system for dealing the dispute and complaints receive. This system was refer to two procedures. The First is Procedure of Complaints Acceptance Procedure Complaints and Dispute resolution (PRO-BNM-007, effective since 9 February 2017, Revision 05). These procedure as a technical guidance in receiving various complaints raised by stakeholders or another party and way to process of completion. And the second is Procedures Complaining And Grievance from Employees (PRO-HR-005, effective since 23 April 2015, Revision 03). These procedure is a guideline to accommodate grievances and complaints from employees who work in PT AMP Plantation. This procedure is a technical guidance in receiving various complaints raised by stakeholders or another related party and at the same time the process of completion.

Based on the procedure above was explained that relates to the complaints of external stakeholders (employees), which is responsible for receiving complaints is Social Division (Bina Mitra) at the level of estate and then forward it to the

Community Partnership in Regional Office. If the complaints are coming from the part of employees (internal), then in charge of receiving complaints (oral or written) it is responsible in each work unit and then forwarded to the Personal General Affairs (PGA) or Officer of Worker Union by fill in the Form of Complaint Acceptance (FRM-HRD- 052). However if could not be resolved then it will be forwarded to the next management level refer to appropriate legal reference in Indonesia. If the joint settlement cannot be reached, the complaint will submit to the RSPO Grievance System (RSPO Complain System). There was also explained in the procedure related to confidentiality, that the Company will guarantees the anonymity of the reported of events (*whistleblower*). All forms of reporting irregularities will be guaranteed confidentiality by the company to avoid of the risk of retaliation.

Based on interview with *Ninik Mamak* and village leader (wali jorong) Wonosari, Salareh Aia and Bawan known that they were informed regarding to land dispute or land complaint procedure.

### 6.3.2

During this audit, there is a grievance from the customary leader of Masyarakat Adat Luhak Nan Tigo (on behalf of Mr. Syahrul Ramadan Dt. Sinaro) that has been submitted to the RSPO grievance <https://askrspo.force.com/Complaint/s/case/50090000028EoXsAAK/details> complaint reference RSPO / 2018/12 / RB. In addition, there are also notes on the website <http://www.forestpeoples.org/en/agribusiness-palm-oil-rspo/press-release/2018/press-release-palm-oil-plantations-linked>.

Until 26 September 2018, current status of this issues in RSPO Website is in *"Initial Diagnosis endorsed by the CP and the Complaint is formally accepted. The Secretariat has informed to the parties to the Complaint"*.

<b>Status: Comply</b>
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## 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

Based on document review, District Government facilitated Wilmar to start their operation in Agam and Pasaman Barat District since early 1990. There also no new planting or new acquisition process after 2005. However, To handling and manage Certificate holder has had several procedure related to FPIC mechanism such as:

- *Prosedur Penyelesaian Sengketa Lahan* (No. Dok: PRO-BNM-013, Rev. 02) dated 23 Augustus 2016).
- *Procedure Penerimaan Keluhan dan Penyelesaian Perselisihan* (PRO-BNM-007, Rev. 02, dated 17 February 2017).

### 6.4.3

Basically, since the certificate holder has obtained land use right (HGU) there is no more land compensation was made. Because, prior to certificate holder propose the land use right to the government, all the plantation area owned by customary people known as *"Hak Ulayat"*. The process of negotiation and handing over the *"Hak Ulayat"* land to the government are recorded since 1990's. The handing over of the land are chosen and approved by their own representative namely *"Ninik Mamak"* on that moment.

Based on year of planting in sampling estate during Re-Certification which are AMP-3 Estate, Smallholders TTK and BST, there are no found an oil palm plantation was developed after November 2005. However, in PMJ Estate there was a planting year after November 2005 (YoP 2006, 2009 and 2010). The land status is from compensation from villagers that have been agreed to release their land to the company. The land is located within the permitted area or HGU of the company.

Negotiated agreement to compensate its land has been provided and available in place. The process of land compensation was following the FPIC mechanism.

<b>Status: Comply</b>
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## 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 & 6.5.2

The certificate holder has implemented decree of West Sumatera Governor related to minimum wage and province minimum wage in 2019. The decree was reaffirmed for implementation in the form of Internal Memorandum. Furthermore, the basic salary for worker is explained in appointment decree. Review of documents also show an example of pay slip which explain the details of income (basic salary, premium pay) and deduction such as employment insurance payment and other deductions.

The certificate holder has Collective Labor Agreement that has been ratified by Labor and Transmigrations Agency. The Collective Labor Agreement describes related to company and workers duty and rights, such as wage system, assessment of worker performance, promotion, demotion, leave rights, etc. the company doesn't have work agreement with worker in form of appointment decree for daily, because all workers in the company has been permanent worker.

There are several facts found by the auditor team during the audit as follows:

- Results of public consultations with the Office of PTSP (One-Stop Integrated Service) and Employment of Agam Regency, Pasaman Barat District Manpower Office and Regional Worker Supervisor II of the West Sumatra Province Manpower and Transmigration Office, found that there were reports of overtime payments that were not in accordance with regulations / legislation at PT AMP Plantation.
- Based on a review of the security schedule documents in March and April 2019 in AMP I, AMP II, AMP III and PT PMJ it is known that short days in one week are Saturday (working only 5 hours), picket security is 3 shifts (7 working hours and 1 hour break). Security who work on Saturdays only get 1 man days salary and do not get 2 hours overtime.

The company has not been able to show evidence that all workers who work outside working hours (overtime) have received overtime wages in accordance with Decree of Manpower Minister No. 102/2004 about overtime work and wages for overtime. Based on that fact, it raised **Non-Conformity No. 2019.03 indicator**

### 6.5.3

Based on the results of field visits in workers housing, it is known that the company has provided decent welfare facilities for workers such as housing, availability of clean water and drinking water (drinking water depots in houses), availability of electricity originating from national power company, availability of health facilities (clinic) in each unit and have doctors/paramedics (nurses and midwives), worship facilities for workers. In addition, the company also provides educational facilities in the form of kindergarten and junior high school located in the company's environment as well as the provision of school buses for the transportation of children of workers. All these facilities can be easily accessed by all workers and their families.

Based on the results of interviews with workers on manual weeding activities in the TTK it is known that the clean water available at the workers' housing is still not sufficient for the clean water needs of workers, but during the visit and interview with residents of housing at TTK, information was obtained that the company had provided clean water in the form of 3 each well is used for 6 houses and the availability of water is stated to be sufficient for the daily needs of residents of the housing. Ensure adequate water supply in the Tompek Tapan Kandi Cooperative housing (OFI)

### 6.5.4

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

Based on the results of interviews with workers, labor unions and gender committees, it was found that workers had no difficulty in obtaining food sources because the company had provided cooperatives selling daily necessities and vegetable sellers were given access to sell in their houses. Besides that, workers can buy these needs to markets around the company's area with access that is not too difficult.

6.5.2	<b>Status:</b> <b>Non-Conformity No. 2019.03 with Major category</b>	
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### 6.6

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

**6.6.1 & 6.6.2**

The company has an internal memorandum number 026 / WIP-HRD / Int-VIII / 2009 dated 12 August 2009 concerning labor provisions, one of which points to freedom of association. "The company guarantees the freedom of each employee to form and become a member of a labor union in accordance with the applicable legislation". In addition, the company has a Collective Labor Agreement which states that the company has recognized the existence of unions in the company and provided support to all workers who wish to associate. These policies are known by workers and all levels of workers (permanent workers, migrants, non-migrants, contract workers and others) who can join as members of labor unions in companies. The policy is available in Bahasa and result of policy is formation of Labor Unions in every unit.

Companies can show meetings between companies and trade unions as well as meetings between trade unions and their members as follows:

- The SPSI meeting on 29 April 2019 which discussed the selection of new administrators, social funds and tent facilities attended by 23 participants.
- Bipartite meetings between Management of the Company and Labor Unions (SPSI and SERBUNDO) from PT AMP Plantation and PT PMJ on 18 January 2019 which discussed coordination and socialization of Collective labor Agreement, company provisions, Provincial Minimum Wages in 2019 , and management of Labor Unions. The meeting was attended by 37 participants consisting of company management and union management.
- Trade Union Meeting (SPSI & SERBUNDO) with members on March 19, 2019 attended by 13 participants and discussed the development of trade union organizations, workers' rights and obligations.

<b>Status: Comply</b>
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**6.7**

**Children are not employed or exploited.**

**6.7.1**

The certificate holder has a Child Labour Policy signed by Group Plantation Head and Group CSR Head on September 2010. The policy explains:

- Will not employ children who are included in the ILO convention's definition of provisions, regardless of any state or local laws or regulations that allow it
- Will comply with all applicable child labour laws and regulations, including all things related to payroll, working hours, overtime and workplace conditions
- Oppose all forms of exploitation of children. The Company will not provide work to the children before they reach the age allowed by law to complete compulsory education, in accordance with the provisions of the local government
- Expect business partners and cooperating agencies to have and apply the same standards and comply with government law enforcement in place of operation. If Wilmar knows of these violations and is not corrected, we will take serious action, including termination of business relationships.
- It is the responsibility of local management and HRD departments to implement and ensure compliance with this policy in all Wilmar operations and facilities.

Based on interview with worker union and gender committee, there are no personnel under 18 years old during the hiring. Based on interview, personel should attach their national identity card in order to ensure that candidate was more than 18 years old. Furthermore, company will verify candidate's national identity card. Based on document verification and fiield visit, there is no indication the use of child labor.

<b>Status: Comply</b>
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**6.8**

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

**6.8.1; 6.8.2 & 6.8.3**

Policies related to the absence of discrimination against employees have not changed from the previous assessment. The company has a policy on equal opportunities to get employment opportunities, September 2010 signed by Group Plantation Head and CSR Head Group. The policy explains that Wilmar supports the principles of justice and aims to treat everyone with respect, free from discrimination that violates the law and ethics. In particular, this policy aims not to discriminate against gender, race or ethnicity, disability, sexual orientation, age or belief; but to develop a global workforce that has capabilities based on objective assessment.

To ensure the implementation of the auditors conducting a document study of the workers list, it was found that workers

recruited had diverse educational, ethnic and religious backgrounds. In addition, based on field observations, it is known that workers come from various ethnic groups, religions, races and sexes.

Based on the results of interviews with workers, trade unions and gender committees found that the recruitment of workers was based on the needs of the company regardless of ethnic background, religion, race and class. All prospective employees have the right to get the opportunity to work according to their scientific background and company needs. In addition, during 2018 there were no issues regarding discrimination against workers.

<b>Status: Comply</b>
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## 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

The company has a policy on equal opportunities to get employment opportunities, September 2010 signed by Group Plantation Head and CSR Head Group. The policy explains that Wilmar supports the principles of justice and aims to treat everyone with respect, free from discrimination that violates the law and ethics. In particular, this policy aims not to discriminate against gender, race or ethnicity, disability, sexual orientation, age or belief; but to develop a global workforce that has capabilities based on objective assessment. In addition, the company also has a policy in the form of Intern No. Memorandum. 026 / WIP-HRD / Int-VIII / 2009 which was approved by HRD Head Memed Kosasih on August 12, 2009. The memorandum explained that all employees must maintain decency and security while in the workplace and prohibit any element of sexual harassment and oppression of women.

The company has a gender committee work program in 2019 with activities such as gender restructuring, regular management meetings every semester, gender socialization, carrying out healthy heart exercises. In addition, the company prohibits women who are pregnant and breastfeeding from working with chemicals-related work and the company has procedures governing this matter. In addition, the company also gives special time to women workers who are breastfeeding effectively.

Based on the results of interviews with the committee members of the gender committee, it was found that policies related to gender and women's rights determined by the company became a reference for administrators to carry out activities and outreach to workers. During the past year there have been no incidents or issues related to sexual harassment, domestic violence, child labor or human rights violations.

<b>Status: Comply</b>
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## 6.10

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

### 6.10.1; 6.10.2; 6.10.3

AMP POM is supplied by certified sources (own estate and scheme smallholder) and uncertified sources (independent outgrower). FFB prices for scheme smallholder are refer to FFB prices that decided by respective government agency based on monthly meeting with local palm oil actors. In the other hand, FFB prices to independent outgrower decided based on agreement with logistic department. Daily prices will informed by phone on short message. The sample of FFB purchase agreement are in place.

### 6.10.4

The payment process to FFB Supplier was paid out via bank transfer. Based on clause of contract. Before payment will process, the company will verification and preparing several document comprise with: issued of Official Report of Work Checking by PT AMP, Invoice from the contactor to PT AMP, issued of Bank Voucher by the PT AMP and Receive from PT AMP to FFB Supplier as payment evidence. Based on interview with one of local FFB supplier, known that the payment process was carryout consistently every month based on clause in contract.

Evidence of payment and other documents, such as documents of Contractor Payment and Calculation was stored in the office and the payment receipt was keep by a local contractor.

<b>Status: Comply</b>
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## 6.11

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

### 6.11.1 & 6.11.2

In identifying local development needs and priorities for the surrounding community, the company has participated in several activities involving the government and surrounding communities, one of which is by disseminating information for the implementation of 2018 CSR and 2019 CSR plans for the community and village administrators in Nagari Bawan on May 3 2019 which was attended by 7 participants. The company has a local development program listed in the CSR program which is prepared annually based on the results of identification carried out to the affected communities. The company can also show the CSR program along with the realization that has been done as follows:

- Education & Facility Assistance
- Cultural Assistance
- Religious Assistance
- Sport & Recreation Health Assistance
- Economic Development Activity Assistance
- Infrastructure Assistance
- Nationality Holiday Assistance
- Disaster Aid Assistance

The company has carried out the CSR program in accordance with its objectives and can be shown proof of its realization in the form of photos, minutes and other evidence. Based on the results of interviews with surrounding villagers it is known that so far the company has carried out CSR activities in each village and the village community has felt that this is enough to help the development and growth of the village community. In addition there are also many rural communities working in companies and information related to job vacancies is always given to the surrounding community when the company needs labor.

The company has set 2 workers to supervise and guide the Cooperative of Tompek Tapian Kandis and Bukit Sandiang Tigo, this is done to help and facilitate operational activities within the Cooperative. In its activities the cooperative also has a representative assigned as a manager and communicates directly about operational activities with the company, namely:

- The Scheme Manager of the Tompek Tapian Kandis Cooperative is Rabuman in accordance with Decree No. 01 / PS.TTK / IV / 2014 which was approved by the management on 08 June 2014.
- The Scheme Manager of the Bukit Sandiang Tigo Cooperative is Kamiruddin in accordance with Decree No. 02 / KUD-BST-BWN / Int-II / 2015 which was approved by the management on 02 February 2015.

	<b>Status: Comply</b>	
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## 6.12

### No forms of forced or trafficked labour are used.

#### 6.12.1; 6.12.2 & 6.12.3

The company has Wilmar International Ltd's Human Rights Policy, which was published in June 2014 and approved by the Group Plantation Head and CSR Head Group. In the policy it was stated that Wilmar's commitment supports respect and protection of human rights (including prevention of forced labor); such as anti-child labor, K3 policies, giving equal opportunities to everyone, reporting and complaints, anti-sexual harassment, anti-violence and torture, respect for reproductive rights, and corporate social responsibility.

Based on the results of a review of work contract documents and a list of workers it is known that there were no foreign workers working at the level of executive workers to manager positions. Foreign workers only exist at the top management level. In addition, there are no workers from trade or illegal workers or contract substitutions because all workers have work ties with the company. This is in line with the results of interviews with harvest, fertilizer, spray and factory operators who stated that so far there had been no use of forced labor, child labor, or family members who helped employees. All workers have clear working ties with the company.

	<b>Status: Comply</b>	
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## 6.13

### Growers and millers respect human rights

#### 6.13.1

The company has Human Rights Policy signed by Goh Ing Sing (Group Plantation Head) and Jeremy Goon (Group CSR Head), updated in June 2014 and included in the Wilmar Policy (05 December 2103, updated 01/16/2015, reviewed by Khairul Anwar) in point 3 that it will not exploit fellow humans and the local community. The company has socialized the policy to all workers, socialization was carried out in each unit at the time of the morning rally. The following is the

socialization that has been given by the company to its employees, including:

- Socialization of Human Rights Policy on 15 February 2019 which was attended by 177 workers at PT Primatama Mulia Jaya
- Socialization of Human Rights Policy on 30 March 2019 which was attended by 94 participants at AMP-2 Estate

Based on the results of interviews with labor unions and gender committees, there have been no cases of human rights violations committed by the company. This is also the same as the results of interviews with surrounding villagers, namely there have never been cases of human rights violations committed by the company to the surrounding community.

**Status: Comply**

### PRINCIPLE #7 Responsible development of new plantings

#### 7.1

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

##### 7.1.1, 7.1.2, 7.1.3

The certificate holder has no expansion area for new development since Re-Cert. An independent social and environmental impact assessment (SEIA), undertaken through a participatory methodology including the relevant affected stakeholders are still applicable and documented. Please refer to Criteria 5.1 and 6.1

**Status: Comply**

#### 7.2

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

##### 7.2.1

Based on soil survey report review, as well as field observation to the sampled estates, it could be concluded that in general soil feasibility were dominantly marginal for oil palm cultivation, but there is no fragile soils within sampled estates operational areas. However, there were several limitations on soil management, such as drainage problem (prone to flood area), loamy texture, prone to moisture stress and yield fluctuation, soil erosion on steeper slopes, low fertility, leaning palms on peat area and a presence of moderately deep to deep organic soils. Thus, to overcome those limitations factors, estate management has strategy which already implemented, as follows:

- Soil monitoring and mitigation: cover crop establishment, terracing on hilly area, proper frond stacking, EFB application.
- Good fertilizer program as recommended by Agronomist through leaf and soil sampling analysis.
- Initial drainage and delayed planting, compaction along planting line and adopting hole in hole planting.
- Additional fertilizer including Cu, Zn and B.
- Soil moisture conservation.
- Erosion mitigation through planting of vertifer grass, selective weeding and establishing riparian zone.

##### 7.2.2

Based on soil survey analysis, it was known that slope condition in AMP 2 Estat3, PMJ Estate, TTK Cooperative Estate and BST Cooperative Estate are dominantly flat to undulating, or ranged between 0° to 6°. Thus, there is no soil management limitation due to hilly to steep area. However, several points in very small area during field observation in TTK Estate were found hilly but, terraced planting pattern already implemented on those particular field. Limitation were mostly due to prone flood area. To overcome this matters estate management has conducting field drains system.

**Status: Comply**

#### 7.3

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

##### 7.3.1, 7.3.2, 7.3.3, 7.3.4, 7.3.5

The Certificate Holder (PT AMP, PT PMJ) has performed the HCV identification on 2010 by RSPO Approved HCV Assessor. Prior to audit ASA1.2, unit Management unit has shown confirmation from RSPO on August 16th 2017 related status of the Certificate Holder liability referred to indicator 7.3.1. Explanation from RSPO Secretariat that PT. AMP and PT PMJ has submit Disclosure of Liability on 26 January 2017 with status of Zero Liability.

**Status: Comply**



**7.4**
**Extensive planting on steep terrain, and/or on marginal and fragile soils, is avoided.**
**7.4.1**

AMP 2 and PMJ Estate has soil map which derived from Semi Detail Soil Survey Report which conducted by Param Agricultural Soil Survey, Sdn. Bhd. in May 2008. Furthermore, Soil Map for TTK Cooperative and BST Cooperative are derived from R&D report, which presented in Map Ref. No. HD4010 dated 31 April 2015 and No. HD4732 dated 22 April 2015, respectively. All soil map are available in proper scale (1:50,000). Based on reference document review, as well as field observation to the sampled estates, it could be concluded that there is no fragile soils within sampled estates operational areas. However, there were several limitations on soil management, such as drainage problem (prone to flood area), loamy texture, prone to moisture stress and yield fluctuation, soil erosion on steeper slopes, low fertility, leaning palms on peat area and a presence of moderately deep to deep organic soils. According to soil map, it was known that there were 833.00 ha (32.40 %) and 1,395.70 ha (98.00 %) of Typic Haplohemist Soil (Organic soil) in AMP 2 Estate and PMJ Estate, respectively. Furthermore, there are no presence of organic soils in TTK and BST Cooperative operational areas. Moreover, based on soil survey analysis, it was known that slope condition in AMP 2 Estate, PMJ Estate, TTK Cooperative Estate and BST Cooperative Estate are dominantly flat to undulating, or ranged between 0° to 6°. Thus, there is no soil management limitation due to hilly to steep area. However, several points in very small area during field observation in TTK Estate were found hilly but, terraced planting pattern already implemented on those particular field. Limitation were mostly due to prone flood area. To overcome this matters estate management has conducting field drains system.

**7.4.2**

According to soil survey review, it was known that there is no presence of fragile soil. However, there is presence of marginal soil which lead to several limitation on oil palm cultivation such as shallow organic soil, sandy soil, low fertility, flooded area, etc. To overcome such limitation, estate management has strategy which already implemented, as follows:

- Soil monitoring and mitigation: cover crop establishment, terracing on hilly area, proper frond stacking, EFB application.
- Good fertilizer program as recommended by Agronomist through leaf and soil sampling analysis.
- Initial drainage and delayed planting, compaction along planting line and adopting hole in hole planting.
- Additional fertilizer including Cu, Zn and B.
- Soil moisture conservation.
- Erosion mitigation through planting of vertiver grass, selective weeding and establishing riparian zone

**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**

Until now, the Certificate Holder was not extend for new plantation area, there was only any replanting program was done since 2015.

**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**

Until now, the Certificate Holder was not extend for new plantation area, there was only any replanting program was done since 2015.

**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**

Zero burning activities for land preparation are listed on procedures PRO-EST-002 and WILMAR Environmental policy related zero buring activities on 2012. Document review and field verification shown that company are not conduct any

new development since RE-cert, replanting activities was undertaken in 2018 on AMP-2 estate and on year 2019 on tompek tapian kandi cooperatives, regarding this field visit shown land clearing activities for replanting was done mechanically without burning activities.		
	<b>Status: Comply</b>	
<b>7.8</b>		
<b>New plantation developments are designed to minimise net greenhouse gas emissions.</b>		
7.8.1, 7.8.2		
There is no new development since January 2015 for entire areas on PT AMP and PT PMJ. Existing GHG calculation has been described on criteria 5.6		
	<b>Status: Comply</b>	
<b>PRINCIPLE #8 Commitment to continuous improvement in key areas of activity</b>		
<b>8.1</b>		
<b>Growers and millers regularly monitor and review their activities and develop and implement action plans that allow demonstrable continuous improvement in key operations.</b>		
<b>8.1.1</b>		
<b>Internal Audit</b>		
<ul style="list-style-type: none"> <li>• <b>AMP 2 Estate:</b> RSPO Internal audit in AMP 2 Estate is presented in document No. FRM-GEN-024 (Rev. 03) dated 19 February 2019. As per review, it was known that there were 22 finding identified, which all had been closed on 24 April 2019. Follow up of finding, as well as correction evidence of specific finding are presented in document Form No. FR-GEN-005 (Rev. 08).</li> <li>• <b>PMJ Estate:</b> RSPO Internal audit in PMJ2 Estate is presented in document No. FRM-GEN-024 (Rev. 03) dated 22 February 2019. As per review, it was known that there were 25 finding identified, which all had been closed on 14 March 2019. Follow up of finding, as well as correction evidence of specific finding are presented in document Form No. FR-GEN-005 (Rev. 08).</li> <li>• <b>TTK Cooperative:</b> RSPO Internal audit in TTK Cooperative Estate is presented in document No. FRM-GEN-024 (Rev. 03) dated 08 April 2019. As per review, it was known that there were 9 finding identified, which all had been closed on 30 April 2019. Follow up of finding, as well as correction evidence of specific finding are presented in document Form No. FR-GEN-005 (Rev. 08).</li> <li>• <b>BST Cooperative:</b> RSPO Internal audit in BST Cooperative Estate is presented in document No. FRM-GEN-024 (Rev. 03) dated 08 April 2019. As per review, it was known that there were 9 finding identified, which all had been closed on 30 April 2019. Follow up of finding, as well as correction evidence of specific finding are presented in document Form No. FR-GEN-005 (Rev. 08).</li> </ul>		
Environmental aspect		
As a part of emission reducing plan and palm oil mill effluent utilization, PT AMP plantation has construct methane capture plant and until now this plant are still in commissioning progress.		
<b>Worker Welfare</b>		
<ul style="list-style-type: none"> <li>• The company has set minimum wage regulations for all workers based on the stipulation of minimum wages by the Governor of West Sumatra for 2019 and currently all workers are workers with permanent employee status.</li> <li>• The company facilitates workers with adequate housing, electricity facilities, and availability of clean water in every publicly available housing.</li> <li>• The company is also committed to avoiding acts of discrimination, sexual harassment, child labor or acts of human rights violations in the work environment.</li> </ul>		
	<b>Status: Comply</b>	

**3.2. Summary of Assessment Report of Supply Chain Requirement**
**3.2.1. General chain of custody requirements for the supply chain**

Clause	Requirement
<b>5.1</b>	<b>Applicability of the general chain of custody requirements for the supply chain</b>
5.1.1	<p>The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. After the end product manufacturer, there is no further requirement for certification.</p> <p>General Chain of Custody only applied in mill and supply bases such as:</p> <ul style="list-style-type: none"> <li>• PT. AMP Plantation (AMP1, AMP2, AMP3 and AMP4 Estate).</li> <li>• PT. Primatama Muliajaya (PMJ Estate)</li> <li>• Scheme smallholder (Tompek Tapiah Kandis, Mutiara Sawit Jaya, Bukit Sandiang Tigo, Agro Wira Masang Cooperation).</li> </ul> <p>Mill are only received and processed the FFB until dispatch. Other physically handling such as CPO/PK delivery taking over by the buyer.</p>
	<b>Status: Comply</b>
5.1.2	<p>Traders and distributors require a license obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model.</p> <p>Facility only received and processed FFB from the certified and uncertified sources. There is no trading activity by mill.</p>
	<b>Status: Comply</b>
5.1.3	<p>Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform.</p> <p>PT. AMP Plantation POM subsidiary of Wilmar International Ltd has registered in RSPO membership 2-0017-05-000-00 since 16 August 2005.</p> <p>PT. AMP Plantation POM has been registered in IT platform palm trace RSPO <a href="https://palmtrace.rspo.org/web/rspo/member-directory">https://palmtrace.rspo.org/web/rspo/member-directory</a> which information as follows:</p> <ul style="list-style-type: none"> <li>• Member Name: PT. AMP Plantation POM</li> <li>• Account UID: RSPO_AC1000000629</li> <li>• Core Product: Palm Oil</li> <li>• Member ID: RSPO_PO1000000601</li> <li>• Type of Business: Oil Mill</li> </ul>
	<b>Status: Comply</b>
5.1.4	<p>Processing aids do not need to be included within an organization's scope of certification.</p> <p>There is no processing aids in the operational AMP POM</p>
	<b>Status: Comply</b>
<b>5.2</b>	<b>Supply chain model</b>
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 -&gt; Segregated -&gt; Mass Balance.</p>

Based on document verification, mill received FFB from own estate (certified), smallholder cooperation (certified), smallholder (noncertified) and independent supplier (noncertified). Until this ASA-1.2 audit informed that mill only using Module E for Mills - Mass Balance.	
	<b>Status: Comply</b>
<b>5.2.2</b>	
The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	
Based on document verification, mill received FFB from own estate (certified), smallholder cooperation (certified), smallholder (noncertified) and independent supplier (noncertified). Until this ASA-1.2 audit informed that mill only using Module E for Mills - Mass Balance.	
	<b>Status: Comply</b>
<b>5.3</b>	<b>Documented procedures</b>
<b>5.3.1</b>	
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.	
There is no changes procedure since previous assessment.	
Mill has had procedure regarding to supply chain as follows:	
<ol style="list-style-type: none"> <li>1. SOP Mass Balance (<b>SOP – MILL- 024) Rev 6 dated 05 March 2018</b>) Procedures include: Data Input of FFB (Certified &amp; Non Certified); Data Input of FFB process become CPO (Certified &amp; Non-Certified); Data Input of CPO Dispatch (Technical dispatch, Seals mounting, Delivery of certified products need to be approved by Head of Administrator and Mill Head); Logistics of quantity data input of sustainable and non-sustainable product delivery; Every three months the condition of the stock balance should not be negative; Transactions of certified products, logistic parts inputting data in the eTrace system after all commodities are shipped by POM and accepted by consumers. Data input is done after all the transaction details are correct. The revision are about reference, removing stock on Palm Trace,</li> <li>2. Responsible person in the whole process of supply chain described in Procedure of traceability for CPO and PK (<b>SOP – MILL- 011) Rev 2 dated 21 February 2016</b>) Security (register of all FFB expeditions and dispatch of CSPO / CPO), Weigh operators (weighing in all received FFB and shipping products), Logistics (calculation results of CSPO / CPO production, dispatch, reports of the products delivery and traceability report), Head of Administrator (acceptance control of FFB and CSPO / CPO, FFB acceptance report, dispatch, product delivery reports and traceability reports), Mill Head. Even though the procedure issued before the new standard of supply chain for mill updated last year, the company's supply chain procedure is still adequate.</li> <li>3. The CH has Memorandum from Manager Sustainability &amp; Supply Chain Department of Wilmar International Ltd. on 02 January 2018 about prohibition to using logo and trademark of RSPO.</li> </ol>	
During the audit, auditor has interviewed personal in charge related to supply chain implementation such as security officer in mill's gate and weighbridge officer. Through the interview informed that the person has receive properly training on this and also demonstrated of FFB received separation, mass balance document, dispatch process and administration.	
	<b>Status: Comply</b>
<b>5.3.2</b>	
The site shall have a written procedure to conduct annual internal audit	
Facility has had the internal audit procedure (PRO-GEN-003 dated 01 March 2018) which described the internal audit conducted every 12 months. Based on document review, the last internal audit for supply chain has been conducted on 9 March 2019.	
	<b>Status: Comply</b>
<b>5.4</b>	<b>Purchasing and goods in</b>
<b>5.4.1</b>	
The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier.	
Question :	
All RSPO product information is provided by suppliers in accordance with :	
<ul style="list-style-type: none"> <li>• The name and address of the buyer;</li> </ul>	

- The name and address of the seller;
- The loading or shipment / delivery date;
- The date on which the documents were issued;
- A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);
- The quantity of the products delivered;
- Any related transport documentation;
- Supply Chain certificate number of the seller;
- A unique identification number
- Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation).
- The site receiving RSPO certified oil palm products shall ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements/Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. Refer to section 5.7.1 of this document for further guidance.
- A check of the validity of the Supply Chain Certification of suppliers is required for all sites that are SC certified. This shall be checked via the list of RSPO Supply Chain Certified sites on the RSPO website ([www.rspo.org](http://www.rspo.org)) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements.
- The validity of license for traders and distributors shall also be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcements/announcements.

Facility does not purchase RSPO certified oil palm products. AMP POM is the producer of RSPO certified oil palm products.

**Status: Comply**

#### 5.4.2

The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents

Facility does not purchase RSPO certified oil palm products. AMP POM is the producer of RSPO certified oil palm products.

**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.

Facility did not have an agreement with independent third parties / outsourcing. All physically handling activity after dispatch (transporting, storage at bulking, refining, crushing etc) organized by buyers according to their contract.

**Status: Comply**

##### 5.5.2

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

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

Facility did not have an agreement with independent third parties / outsourcing. All physically handling activity after dispatch (transporting, storage at bulking, refining, crushing etc) organized by buyers according to their contract. So, mill does not need to provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance.



	<b>Status: Comply</b>
<b>5.5.3</b>	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.
	Facility did not have an agreement with independent third parties / outsourcing. All physically handling activity after dispatch (transporting, storage at bulking, refining, crushing etc) organized by buyers according to their contract.
	<b>Status: Comply</b>
<b>5.5.4</b>	The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products
	Until this audit, facility did not have an agreement with independent third parties / outsourcing. All physically handling activity after dispatch (transporting, storage at bulking, refining, crushing etc) organized by buyers according to their contract.
	<b>Status: Comply</b>
<b>5.6</b>	<b>Sales and goods out</b>
<b>5.6.1</b>	The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form: The name and address of the buyer
	Facility has had the information of buyer. During this certification period, there is 3 (three) buyer that only listed in selling document as follows: <ol style="list-style-type: none"> <li>1. PT. WINA Padang, located in Padang, West Sumatera. Contact detail are in place.</li> <li>2. TTBT Padang, located in Padang, West Sumatera. Contact detail are in place.</li> <li>3. PT. Usaha Inti Padang, located in Padang, West Sumatera. Contact detail are in place.</li> </ol> <p>According to interview with mill manager known that all contact detail are updated if any new buyer.</p>
	<b>Status: Comply</b>
<b>5.7</b>	<b>Registration of transactions</b>
<b>5.7.1</b>	Supply chain actors who: <ul style="list-style-type: none"> <li>• Are mills, traders, crushers and refineries; and</li> <li>• take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable</li> </ul>
	Facility has shown their transaction document that consist registration in IT platform. It also can be downloaded at RSPO palm trace. During the audit, auditor has verified the sales information in RSPO Palm Trace that informed there is a record of certified product sold as RSPO certified product and other scheme (ISCC).
	<b>Status: Comply</b>
<b>5.7.2</b>	The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform: <ul style="list-style-type: none"> <li>• Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures.</li> <li>• Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually.</li> <li>• Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.</li> </ul>

- Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.

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

### Shipping Announcement:

#### Finalized Transactions

Transaction ID	Transaction Date	Buyer Reference Number	Product	Volume	Supply Chain Model	Quality	Transaction Type	Status
TR-8ad9e82a-cefe	18-04-2019		CSPK	759,68	Mass Balance		Shipping	Confirmed
TR-9eea8777-7f36	25-03-2019		CSPK	674,73	Mass Balance		Shipping	Confirmed
TR-46f0475b-9a4a	11-03-2019		CSPK	783,31	Mass Balance		Shipping	Confirmed
TR-b427f919-65c0	25-01-2019		CSPK	637	Mass Balance		Shipping	Confirmed
TR-fe1295ba-5e45	27-12-2018		CSPK	706,89	Mass Balance		Shipping	Confirmed

### Removing stock:

#### Stock Transactions

Stock Transaction ID	Date	Product	Supply Chain Model	Transaction Type	Volume
ST-TR-796780a0-7ed1	02-05-2019	CSPO	Mass Balance	Remove From Certified Stock	22.196,71

\*Volume in MT

All transaction record are listed in palmtrace.

**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

Facility has had annual training plan regarding on supply chain standard and requirement to the related staff and specific personnel in charge in each control point. The last training conducted on 14 December 2018 in meeting room AMP POM attended by 12 person i.e supervisor process, EHS staff, weighbridge operator, security officer, head clerk, supervisor process, supervisor logistic etc.

Based on interview with security officer, weighbridge operator and supervisor logistic known that all personnel involved has been well-known regarding on supply chain implementation.

**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

Based on interview with security officer, weighbridge operator and supervisor logistic known that all personnel involved has been well-known regarding on supply chain implementation.

	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																
Based on SOP of Mass Balance (No. SOP-MIL-024 rev 6 dated 05 March 2018) which explains that all documents related to RSPO-SCCS must be kept at least 2 years and maximum 5 years with document type of data of FFB acceptance, production data and shipment of CPO and PK, and RSPO IT Platform data. Daily records of FFB received, CPO processed, CPO production, PK production, dispatch and selling (selling of certified/non certified and other certification scheme), balance stock always recorded in logistic department and recap by Trading Department Head Office in Jakarta. Those all information can be accessed real time.																
	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																
Based on SOP of Mass Balance (No. SOP-MIL-024 rev 6 dated 05 March 2018) which explains that all documents related to RSPO-SCCS must be kept at least 2 years and maximum 5 years with document type of data of FFB acceptance, production data and shipment of CPO and PK, and RSPO IT Platform data.																
Auditor has verify random document to ensuring the RSPO-SCCS document still kept according to the procedure. Based on document verification, mill still kept the document from 2 May 2014 such as FFB delivery notes, weighbridge ticket, report of quality and dispatch record.																
	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.																
Current certificate:																
<table><tr><th rowspan="2">Name of Mill</th><th rowspan="2">Capacity (tonnes/hour)</th><th rowspan="2">Supply Chain Model</th><th colspan="3">Annual Volume (Tonnes)</th></tr><tr><th>FFB</th><th>CPO</th><th>PK</th></tr><tr><td>AMP POM</td><td>80</td><td>Mass Balance</td><td>198,000</td><td>38,610</td><td>10,395</td></tr></table>		Name of Mill	Capacity (tonnes/hour)	Supply Chain Model	Annual Volume (Tonnes)			FFB	CPO	PK	AMP POM	80	Mass Balance	198,000	38,610	10,395
Name of Mill	Capacity (tonnes/hour)				Supply Chain Model	Annual Volume (Tonnes)										
		FFB	CPO	PK												
AMP POM	80	Mass Balance	198,000	38,610	10,395											
Facility has propose the estimate volume of CPO and PK for the next certification period as follows:																
<table><tr><th rowspan="2">Name of Mill</th><th rowspan="2">Capacity (tonnes/hour)</th><th rowspan="2">Supply Chain Model</th><th colspan="3">Annual Volume (Tonnes)</th></tr><tr><th>FFB</th><th>CPO</th><th>PK</th></tr><tr><td>AMP POM</td><td>80</td><td>Mass Balance</td><td>193,200</td><td>34,800</td><td>9,700</td></tr></table>		Name of Mill	Capacity (tonnes/hour)	Supply Chain Model	Annual Volume (Tonnes)			FFB	CPO	PK	AMP POM	80	Mass Balance	193,200	34,800	9,700
Name of Mill	Capacity (tonnes/hour)				Supply Chain Model	Annual Volume (Tonnes)										
		FFB	CPO	PK												
AMP POM	80	Mass Balance	193,200	34,800	9,700											
	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 ( <a href="http://www.rspo.org">www.rspo.org</a> ); 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																
AMP POM only performs FFB processing up to CPO and PK. Based on SOP of Mass Balance, it is explained that the conversion factors of CPO and PK are based on actual extraction rate.																
	Status: Comply															

<b>5.10.2</b>	
Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	
AMP POM only performs FFB processing up to CPO and PK. Based on SOP of Mass Balance, it is explained that the conversion factors of CPO and PK are based on actual extraction rate.	
	<b>Status: Comply</b>
<b>5.11</b>	<b>Claims</b>
<b>5.11.1</b>	
The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.	
Facility did not using logo.	
	<b>Status: Comply</b>
<b>5.12</b>	<b>Complaints</b>
<b>5.12.1</b>	
The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	
The CH has a Procedure for Receiving Complaints and Settlement of Disputes no. Document: PRO-BNM-007 Revision 05 of the effective date of 09 February, 2017. In the procedure explained that for the resolution of conflicts that arise. Until this audit, there is no complain on the certified product sold.	
	<b>Status: Comply</b>
<b>5.13</b>	<b>Management review</b>
<b>5.13.1</b>	
The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken	
Facility has had the internal audit procedure (PRO-GEN-003 dated 01 March 2018) which described the internal audit conducted every 12 months. Based on document review, the last internal audit for supply chain has been conducted on 9 March 2019. There is no specific issues on supply chain arises.	
	<b>Status: Comply</b>
<b>5.13.2</b>	
The input to management review shall include information on:	
<ul style="list-style-type: none"> <li>• Results of internal audits covering RSPO Supply Chain Certification Standard.</li> <li>• Customer feedback.</li> <li>• Status of preventive and corrective actions.</li> <li>• Follow-up actions from management reviews.</li> <li>• Changes that could affect the management system.</li> <li>• Recommendations for improvement.</li> </ul>	
Facility has had the internal audit procedure (PRO-GEN-003 dated 01 March 2018) which described the internal audit conducted every 12 months. Based on document review, the last internal audit for supply chain has been conducted on 9 March 2019.	
The internal review also consist of:	
<ul style="list-style-type: none"> <li>• Status of preventive and corrective actions.</li> <li>• Follow-up actions from management reviews.</li> <li>• Changes that could affect the management system.</li> <li>• Recommendations for improvement.</li> </ul>	
There is no specific issues on supply chain arises.	
	<b>Status: Comply</b>
<b>5.13.3</b>	

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

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

It documented in management review document as written in preventive action.

**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 sales volume of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.																
Facility received FFB from certified and uncertified sources during this certification period. So, they implemented Module E (Mass Balance).																
	Status: Comply															
E.2	Explanation															
E.2.1																
The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the CB in the public summary of the P&C certification report. For an independent mill, the estimated tonnage of CPO and PK products must be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.																
Current certificate:																
<table><tr><th rowspan="2">Name of Mill</th><th rowspan="2">Capacity (tonnes/hour)</th><th rowspan="2">Supply Chain Model</th><th colspan="3">Annual Volume (Tonnes)</th></tr><tr><th>FFB</th><th>CPO</th><th>PK</th></tr><tr><td>AMP POM</td><td>80</td><td>Mass Balance</td><td>198,000</td><td>38,610</td><td>10,395</td></tr></table>		Name of Mill	Capacity (tonnes/hour)	Supply Chain Model	Annual Volume (Tonnes)			FFB	CPO	PK	AMP POM	80	Mass Balance	198,000	38,610	10,395
Name of Mill	Capacity (tonnes/hour)				Supply Chain Model	Annual Volume (Tonnes)										
		FFB	CPO	PK												
AMP POM	80	Mass Balance	198,000	38,610	10,395											
Facility has propose the estimate volume of CPO and PK for the next certification period as follows:																
<table><tr><th rowspan="2">Name of Mill</th><th rowspan="2">Capacity (tonnes/hour)</th><th rowspan="2">Supply Chain Model</th><th colspan="3">Annual Volume (Tonnes)</th></tr><tr><th>FFB</th><th>CPO</th><th>PK</th></tr><tr><td>AMP POM</td><td>80</td><td>Mass Balance</td><td>193,200</td><td>34,800</td><td>9,700</td></tr></table>		Name of Mill	Capacity (tonnes/hour)	Supply Chain Model	Annual Volume (Tonnes)			FFB	CPO	PK	AMP POM	80	Mass Balance	193,200	34,800	9,700
Name of Mill	Capacity (tonnes/hour)				Supply Chain Model	Annual Volume (Tonnes)										
		FFB	CPO	PK												
AMP POM	80	Mass Balance	193,200	34,800	9,700											
	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).																
PT. AMP Plantation POM subsidiary of Wilmar International Ltd has registered in RSPO membership 2-0017-05-000-00 since 16 August 2005.																
PT. AMP Plantation POM has been registered in IT platform palm trace RSPO <a href="https://palmtrace.rspo.org/web/rspo/member-directory">https://palmtrace.rspo.org/web/rspo/member-directory</a> which information as follows:																
<ul style="list-style-type: none"><li>• Member Name: PT. AMP Plantation POM</li><li>• Account UID: RSPO_AC1000000629</li><li>• Core Product: Palm Oil</li><li>• Member ID: RSPO_PO1000000601</li><li>• Type of Business: Oil Mill</li></ul>																

	<b>Status: Comply</b>
<b>E.3</b>	<b>Documented procedures</b>
<b>E.3.1</b> <b>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:</b> <ol style="list-style-type: none"> <li><b>Complete and up to date procedures covering the implementation of all the elements in these requirements;</b></li> <li><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.</b></li> </ol>	
<p><i>There is no changes procedure since previous assessment.</i></p> <p>Mill has had procedure regarding to supply chain as follows:</p> <ol style="list-style-type: none"> <li>SOP Mass Balance (<b>SOP – MILL- 024) Rev 6 dated 05 March 2018</b>) Procedures include: Data Input of FFB (Certified &amp; Non Certified); Data Input of FFB process become CPO (Certified &amp; Non-Certified); Data Input of CPO Dispatch (Technical dispatch, Seals mounting, Delivery of certified products need to be approved by Head of Administrator and Mill Head); Logistics of quantity data input of sustainable and non-sustainable product delivery; Every three months the condition of the stock balance should not be negative; Transactions of certified products, logistic parts inputting data in the eTrace system after all commodities are shipped by POM and accepted by consumers. Data input is done after all the transaction details are correct. The revision are about reference, removing stock on Palm Trace,</li> <li>Responsible person in the whole process of supply chain described in Procedure of traceability for CPO and PK (<b>SOP – MILL- 011) Rev 2 dated 21 February 2016</b>) Security (register of all FFB expeditions and dispatch of CSPO / CPO), Weigh operators (weighing in all received FFB and shipping products), Logistics (calculation results of CSPO / CPO production, dispatch, reports of the products delivery and traceability report), Head of Administrator (acceptance control of FFB and CSPO / CPO, FFB acceptance report, dispatch, product delivery reports and traceability reports), Mill Head. Even though the procedure issued before the new standard of supply chain for mill updated last year, the company's supply chain procedure is still adequate.</li> <li>The CH has Memorandum from Manager Sustainability &amp; Supply Chain Department of Wilmar International Ltd. on 02 January 2018 about prohibition to using logo and trademark of RSPO.</li> </ol> <p>During the audit, auditor has interviewed personal in charge related to supply chain implementation such as security officer in mill's gate and weighbridge officer. Through the interview informed that the person has receive properly training on this and also demonstrated of FFB received separation, mass balance document, dispatch process and administration.</p>	
	<b>Status: Comply</b>
<b>E.3.2</b> <b>The site shall have documented procedures for receiving and processing certified and non-certified FFBs</b>	
<p><i>There is no changes procedure since previous assessment.</i></p> <p>The mass Balance procedure (SOP-MIL-24 rev.6), to ensure the verification and documentation of certified and noncertified FFB, CPO, PK volume with Mass Balance scheme. Logistic and Mill Manager are responsible to monitor stock balance and the dispatch of CPO/PL.</p> <p>In the FFB Admissions procedure (SOP-Mill-026) Rev. 6 dated March 5, 2018) At 7.7 points explained that the reception of FFB certified, the weighbridge clerk ensure the validity of the certificate matches the FFB recipient supplier list of PT AMP.</p> <p>Based on interview with weighbridge operator and logistic clerk, it is known that the personnel can explain the source of uncertified and certified FFB.</p>	

	<b>Status: Comply</b>		
<b>E.4</b>	<b>Purchasing and goods in</b>		
<b>E.4.1</b>			
<b>The site shall verify and document the volumes of certified and non-certified FFBs received.</b>			
AMP POM does not purchase RSPO certified oil palm products. AMP POM is the producer of RSPO certified oil palm products.			
	<b>Status:</b>		
<b>E.4.2</b>			
<b>The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.</b>			
Facility estimated their palm product which is written in annex of initial assessment certificate and monitored in three-monthly bases. If any overproduction, facility will inform the CB to extend their volume.			
		<b>Annual Volume According to Certificate (Tonnes)</b>	
	<b>Capacity (tonnes/hour)</b>	<b>FFB</b>	<b>CPO</b>
		<b>PK</b>	
AMP POM	80	198,000	38,610
		10,395	
		<b>Actual Volume for 12 month before audit (May 2018 – April 2019 (Tonnes)</b>	
		179,524	29,054
		<b>Estimated Volume (Tonnes)</b>	
		193,200	34,800
		9,700	
<i>Source: production data 12 month before audit (May 2018 – April 2019)</i>			
	<b>Status: Comply</b>		
<b>E.5</b>	<b>Record keeping</b>		
<b>E.5.1</b>			
a. The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.			
b. All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.			
c. The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a site is allowed to sell short. (i.e. product can be sold before it is in stock.)			
Based on document verification informed that facility only received FFB from certified area and sold as RSPO certified.			
<b>Period</b>	<b>CPO Production (MT)</b>		<b>Total</b>
	<b>Cert</b>	<b>Non Cert</b>	
	<b>Cert CSPO Dispatch (MT)</b>		<b>Total</b>
	<b>RSPO</b>	<b>Other scheme</b>	<b>Non Cert</b>
<b>Total</b>	29,054	45,563	74,621
	0	28,981	0
	28,981		28,981
<b>Period</b>	<b>PK Production (MT)</b>		<b>Total</b>
	<b>Cert</b>	<b>Non Cert</b>	
	<b>Cert CSPK Dispatch (MT)</b>		<b>Total</b>
	<b>RSPO</b>	<b>Other scheme</b>	<b>Non Cert</b>
<b>Total</b>	9,854	12,091	21,944
	9,726	0	0
	9,726		9,726
	<b>Status: Comply</b>		
<b>E.5.2</b>			

**In cases where a mill outsources activities to an independent (not owned by the same organization) palm kernel crush, the crush still falls under the responsibility of the mill and does not need to be separately certified. The mill has to ensure that the crush is covered through a signed and enforceable agreement.**

There is no outsources activity with crushing plant. All PK product sold directly to the buyer.

**Status: Comply**

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

<b>1.</b>	<b>Evidence of permission or approval certificate and trademark from Certification Body which submitted by Client</b>	<b>X or√</b>
<b>ASA-1.2</b>	There is no logo use	√
	<b>Status: Comply</b>	
<b>2.</b>	<b>Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of Logo Use</b>	<b>X or√</b>
<b>ASA-1.2</b>	There is no logo use	√
	<b>Status: Comply</b>	
<b>3.</b>	<b>Implementation of Certificate and Trademark is not used on product</b>	<b>X or√</b>
<b>ASA-1.2</b>	There is no logo use	√
	<b>Status: Comply</b>	
<b>4.</b>	<b>Controlling of Certificate and Trademark, including withdrawing inappropriate logo.</b>	<b>X or√</b>
<b>ASA-1.2</b>	There is no logo use	√
	<b>Status: Comply</b>	



### 3.4. Summary of RSPO Partial Certification.

#### Summary Partial Certification

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

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

MUTU has verified partial certification for un-certified unit's subsidiary of Wilmar International Ltd based on their Time Bound Plan. There are seven (7) uncertified mills and sixteen (16) uncertified estates of Wilmar International Ltd. MUTU Auditor verified positive assurance against the company internal audit and supporting evidence as well as any information from others sources.

MUTU Auditor has verified company partial certification and concludes that:

- There are no significant land conflicts which have not been declared above.
- The company has follow RSPO requirement related to New Planting Procedure and Remediation and Compensation Procedure.
- There are no labour disputes that are not being resolved through an agreed process.
- All plantations established since 2005 have been done so in accordance with the applicable laws of the country and that there is no evidence of non-compliance with law in any of the non-certified holdings which has not been declared above.

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p>Yes and positive assurance is produced for these units.</p> <p><b>Auditor verification</b></p> <p>There is internal audit produced for</p> <ul style="list-style-type: none"> <li>- PT Agronusa Investama Pahauman</li> <li>- PT Agro Palindo Sakti 2</li> <li>- PT Musi Banyuasin Indah</li> <li>- PT Sinarsiak Dianpermai</li> <li>- PT Agroindo Indah Perkasa 2</li> </ul> <p>And positive assurance is produced for these units.</p>
2.1.2	<p>No replacement after dates defined in Nis Criterion 7.3 of:</p> <ul style="list-style-type: none"> <li>• Primary forest.</li> <li>• Any area identified as containing High Conservation Values (HCVs).</li> <li>• Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3.</li> </ul>	<p>WILMAR International Ltd has submitted liability disclosure to RSPO on 31 July 2014 and LUCA template on 3-8 March 2015</p> <ul style="list-style-type: none"> <li>- PT Agronusa Investama Pahauman, LUCA document was verified by RSPO on 1 Sept 2015. The 2<sup>nd</sup> LUCA verification document was on 2<sup>nd</sup> Nov 2015 with result of PASS WITH CLARIFICATION.</li> <li>- PT Bhumi Pratama Khatulistiwa, Submitted liability disclosure to RSPO on 8 Dec 2015 and LUCA template on August 2015. The final RSPO endorsement from RSPO compensation on 29 September 2016 is 0</li> </ul>

		<p>ha therefore there is no compensation plan required</p> <ul style="list-style-type: none"> <li>- PT Agro Palindo Sakti 2, LUCA doc was verified by RSPO on 1 Sept 2015. The 2<sup>nd</sup> LUCA review was on Dec 2016 with result of PASS</li> <li>- PT Musi Banyuasin Indah, 0 liability confirmed by RSPO Compensation. There is no planting after 1 November 2005</li> <li>- PT Sinarsiak Dianpermai, 0 liability confirmed by RSPO Compensation. There is no planting after 1 November 2005</li> <li>- PT Agroindo Indah Perkasa 2, 0 liability confirmed by RSPO Compensation. There is no planting after 1 November 2005</li> </ul> <p><b>Auditor verification</b> 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 <sup>st</sup> 2010 must comply with the RSPO New Plantings Procedure.	<p>No new planting/land clearing after 1<sup>st</sup> January 2010.</p> <p><b>Auditor verification</b></p> <ul style="list-style-type: none"> <li>- PT Agronusa Investama Pahauman, The first planting year was in 1999. The latest land clearing was in 2009 based on: LUCA analysis 2009 where the area was already bare land area. LUCA has been submitted to RSPO as part of company disclosure requirement.</li> <li>- There is no new planting after 1<sup>st</sup> January 2010 for, PT Bumipratama Khatulistiwa, PT Agro Palindo Sakti 2, PT Musi Banyuasin Indah, PT Sinarsiak Dianpermai, PT Agroindo Indah Perkasa 2</li> </ul>
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><b>Auditor verification</b> There is no information from public source and RSPO website on any land conflict for uncertified unit of the group subsidiaries.</p> <p>Based on the company record there is documentation on land compensation recapitulation updated on 1 October 2007, participatory mapping, agreement letter on compensation between company and land owner, land owner identity and procedure on compensation technical guidance SOP 001/WIP-KB/(0)/0610 dated June 2010.</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><b>Auditor verification</b></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 mechanism to handle employee complaint and grievance that is stated in SOP 005/WIP-KB/(0)/0610 for communication and consultation with community and SOP 004/WIP-KB/(0)/ 0610 on complaint and grivance mechanism and solving any dispute out off court.</p> <p>There is no list of employee and stakeholder complaint and grievance.</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 process for land legality.</p> <p><b>Auditor verification</b></p> <p>PT Agronusa Investama Pahauman</p> <ul style="list-style-type: none"> <li>- The continues changing on PIPB map. In accordance to PIPB 10 there is no area of the company (based on location permit) that is in the moratorium area. When PIPB 11 released, some area of the company is in the updated peat moratorium map.</li> </ul> <p>PT Agro Palindo Sakti 2</p> <ul style="list-style-type: none"> <li>- There is an obstacle on processing HGU is before continuing the HGU process, the company has to complete the requirement for 20% area allocation for smallholder. Based on BupatiSanggau Decree No. 137 year 2011 dated 25 March 2011 for 623 ha of smallholder scheme for 2 koperasi of Batu Ceramin and and Maju Bersama. Later, koperasi Maju Bersama split into Koperasi Maju Bersama and Koperasi Harapan Baru. And Koperasi Harapan Baru wants to take about 136 ha within company proposed HGU area. The company needs to resolve this issue first before be able to continue HGU process.</li> </ul> <p>PT Musi Banyuasin Indah</p> <ul style="list-style-type: none"> <li>- Overlay the map of land use with attachments Ministerial Decree No. SK.822/Menhut-II/2013 PT MBI entered in production forest area.</li> <li>- Planting outside HGU Kebun Sei Selabu (block 010, 024 and 027).</li> </ul> <p>Explanation management unit following the legal department still perform continuous coordination with the government while waiting for a change of government decisions regarding the status of the area.</p> <p>PT Sinarsiak Dianpermai</p>

		<ul style="list-style-type: none"> <li>- HGU 1,002 Ha on process</li> <li>- Status of Other Use Areas based on Appendix SK 878 / Menhut-II / 2014 dated September 29, 2014 and letter no. S.160 / BPKH.XIX-3/2016 dated March 31, 2016</li> </ul> <p>Explanation management unit as follows:</p> <ul style="list-style-type: none"> <li>- Disagreement between the ministry of forestry by the Riau provincial government on the status of land PT SSDP (between the status of forest and APL), which led to the process of making the concession inhibited.</li> <li>- There are some estate areas around the Mill that does not have permission locations. The process of acquiring a location permit was hampered due to the reasons in point 1 as well.</li> <li>- The legal department is still doing continuous coordination with the government while waiting for a change of government decisions.</li> </ul> <p>PT Agroindo Indah Perkasa 2</p> <ul style="list-style-type: none"> <li>- There is HGU on propose.</li> </ul>
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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 Re-Certification Assessment

NCR No.	:	2018.01	Issued by	:	Rizliani Aprianita Hsb
Date Issued	:	07 July 2018	Time Limit	:	Next Surveillance
NC Grade	:	Minor	Date of Closing	:	May 9 2019
Standard Ref. & Requirement	:	5.1.2 Environment management plan document to prevent negative impacts, its implementation report and revision (if the identification of impact requires changes in current company's practices) shall be available. The company's management shall appoint the responsible person(s) for the implementation of the document.			
Non-Conformance Description & Evidence observed (filled by auditor):					
The certificate holder has demonstrated the identification of aspects and evaluation of environmental impacts as well as the analysis of materials and OSH risks for KUD MSJ and AWM which have plans for management of those impact aspects. However, it has not been able to show evidence of the implementation report of the management plan that has been done.					
Root Cause Analysis (filled by organization audited):					
MSJ and AMM cooperatives are not able shown environment management implementation report because cooperatives are not yet has environment permit/document					
Correction (filled by organization audited):					
Established environment management implementation report for semester basis based on environmental aspect impact identification for MSJ and AWM cooperatives					
Corrective Action (filled by organization audited):					
Established environment management implementation report for semester basis since second semester 2018 and develop continous programme related environment monitoring and management on EHS regular agenda					
Assessor Evaluation and Conclusion (filled by auditor):					
Verification on May 9 2019					
Company shown environmental management and monitoring document for MSJ and AWM cooperatives as listed on second semester enviromental management and monitoring implementation report. This document has described some parameters regarding environment monitoring and management for AWM and MSJ cooperatives such as :					
<ul style="list-style-type: none"><li>• Management related to air ambient and noise per semester</li><li>• Management related to surface water quality per semester</li><li>• Management related to aquatic biota on masang kanan river per semester</li><li>• Management related to community healthcare per year</li><li>• Management related to OHS per semester</li><li>• Management related to ground water quality per semester</li><li>• Management related to wildlife species per year</li></ul>					
Management and monitoring implementation has been reported and listed on environmental management report for example on 2nd semester 2018. Based on this explanation, therefore NC 2018.01 are closed					
Verified by	:	Steve Mualim			

<b>NCR No.</b>	<b>:</b>	<b>2018.02</b>	<b>Issued by</b>	<b>:</b>	<b>Rizliani Aprianita Hsb</b>
<b>Date Issued</b>	<b>:</b>	<b>07 July 2018</b>	<b>Time Limit</b>	<b>:</b>	<b>Next Surveillance</b>



NC Grade	:	Minor	Date of Closing	:	May 9 2019
Standard Ref. & Requirement	:	5.1.3 Environment monitoring plan document, its implementation report, and the corrective plan (if non-conformance arised from the monitoring result) shall be available. This plan is reviewed on two-yearly basis.			
Non-Conformance Description & Evidence observed (filled by auditor):  The certificate holder has demonstrated the identification of aspects and evaluation of environmental impacts as well as the analysis of materials and OSH risks for KUD MSJ and AWM which have plans for management of those impact aspects. However, it has not been able to show evidence that there are environmental monitoring plans and implementation reports.					
Root Cause Analysis (filled by organization audited): MSJ and AMM cooperatives are not able shown environment management implementation report because cooperatives are not yet has environment permit/document					
Correction (filled by organization audited): Established environment management and monitoring implementation report for semester basis based on environmental aspect impact identification for MSJ and AWM cooperatives					
Corrective Action (filled by organization audited): Established environment management and monitoring implementation report for semester basis since second semester 2018 and develop continous programme related environment monitoring and management on EHS regular agenda					
Assessor Evaluation and Conclusion (filled by auditor): Verification on May 9 2019 Company shown environmental management and monitoring document for MSJ and AWM cooperatives as listed on second semester enviromental management and monitoring implementation report. This document has described some parameters regarding environment monitoring and management for AWM and MSJ cooperatives such as : <ul style="list-style-type: none"><li>Monitoring related to air ambient and noise per semester</li><li>Monitoring related to surface water quality per semester</li><li>Monitoring related to aquatic biota on masang kanan river per semester</li><li>Monitoring related to community healthcare per year</li><li>Monitoring related to OHS per semester</li><li>Monitoring related to ground water quality per semester</li><li>Monitoring related to wildlife species per year</li></ul> Management and monitoring implementation has been reported and listed on environmental management report for example on 2nd semester 2018. Based on this explanation, therefore NC 2018.02 are closed					
Verified by	:	Steve Mualim			

**3.5.2. Identification of Findings, Corrective Actions and Observations at ASA-1.2 Assessment**

NCR No.	: 2019. 01	Issued by	: M. Amarullah
Date Issued	: 11 May 2019	Time Limit	: 10 August 2019
NC Grade	: Major	Date of Closing	: 09 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):			
<ul style="list-style-type: none"><li>Based on observation to Clarification Station of APM POM, it was found that 2 internship workers were not equipped with earplug as required by Form No. FRM-EHS-009 dated 01 October 2011.</li><li>The company has hazard identification risk analysis and control for all operational activities in the estate and mill, as well as its risk mitigation. However, based on field observation, it was noted several non conformity as follows:<ul style="list-style-type: none"><li>As observed on manual field upkeep in Block 3A/B TTK Cooperative and Block 1B BST Cooperative, it was found that the workers were not wearing PPE Gloves.</li><li>As observed on Weigh Bridge Station and Grading Station in AMP POM, it was found that driver and loading worker of FFB Supplier from <i>Pemuda Tuah Sakato</i> Organization were not wearing PPE Safety Boot.</li></ul></li><li>Based on TTK Estate musterchit dated 08 May 2019 review, it was known that there is no agrochemical application activities in TTK Cooperative. However, based on observation to PPE Store of agrochemical applicators in AMP 1 Estate, the respective PPE were not available on the provided Store.</li></ul>			
Non-Conformance Description (filled by auditor):			
<ul style="list-style-type: none"><li>The company is not be able to ensure that all workers (included internship) has equipped with proper and complete PPE as required by HIRAC and Form No. FRM-EHS-009 dated 01 October 2011.</li><li>The company is not be able to ensure that all PPE has been managed properly as arranged in procedure No. SOP-GEN-017 (Rev. 01) dated 01 October 2013 Point 6.1.1.1 and procedure No. SOP-EST-002 dated 25 April 2017 Point 5.4.3.</li></ul>			
Root Cause Analysis (filled by organization audited):			
<ol style="list-style-type: none"><li>Lack of control from the respective PIC towards company standard PPE usage (esp. on earplug) for internship workers.</li><li>Regarding with PPE usage:<ol style="list-style-type: none"><li>Lack of control from the respective PIC towards PPE usage (gloves) for upkeep workers in Smallholder Cooperative of TTK and BST.</li><li>Safety requirement of foot protection for FFB-supplier driver and FFB loading worker from <i>Pemuda Tuah Sakato</i> Organization are not fixed yet.</li></ol></li><li>Lack of control from the respective PIC towards monitoring of PPE and work equipment devices usage, as well as its storage management, especially for pesticide applicators from Smallholder Cooperative of TTK in AMP1 Storage.</li></ol>			
Correction (filled by organization audited):			
<ol style="list-style-type: none"><li>To conduct socialization towards PPE and its delivery to internship workers in AMP POM.</li><li>Regarding PPE usage:<ol style="list-style-type: none"><li>To conduct socialization towards PPE (especially gloves), as well as its delivery to upkeep workers from Smallholder Cooperatove from TTK and BST.</li><li>To conduct socialization, to establish and make compulsory statement of PPE shoes usage for driverand FFB loading workers in AMP POM.</li></ol></li><li>To conduct socialization about pesticide application devices storage, as well as PPE storage management to Smallholder Cooperative of TTK in APM1 Storage facility.</li><li>Revision on PPE provisions/supply, included PIC and frequency of PPE usage monitoring in working area.</li></ol>			

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

- To conduct monitoring on PPE usage to workers and visitors in POM unit.
- To conduct monitoring on PPE usage for Smallholder Cooperative workers, especially for TTK and BST.
- To conduct monitoring on working shoes usage for FFB supplier drivers and FFB loading workers in AMP POM.
- To conduct monitoring on pesticide applicator devices storage, as well as its PPE storage management for Smallholder Cooperative workers from TTK in AMP1 Storage facility.
- PIC of the above monitoring is carried out by POU AMP1, Mill Manager, Smallholder Cooperative (Plasma) Manager, EHS and FC Plasma.

**Assessor Evaluation and Conclusion (filled by auditor):**
**Verification dated 22 July 2019**

The company shows several correction evidence, as follows:

- Document No. PRO-GEN-020 (Rev. 01) dated 29 May 2019 about Personal Protective Equipment (PPE) provisions and supply. There is additional item which presented in Point 6.2, about arrangement of PPE distribution, PIC of PPE usage monitoring or inspection in working area, frequency of monitoring and follow-up of monitoring when non-compliance found during inspection.
- Document of PPE Matrix for POM No. FRM-EHS-009 (Rev. 00) dated 01 October 2011 which mentioned that PPE for foot protection purposes for driver and FFB loading workers was rubber boot or just working shoes. Picture documentation of PPE monitoring for those particular workers dated 03 July 2019 were available.
- Document Form No. FRM-EHS-095 (Rev. 00) about PPE condition monitoring and its implementation. The form has informed month of inspection, working unit, division/phase, PIC, list of checked workers, PPE compliance list checking, information of PPE condition and additional information, such as not wears and/or not brings PPE, etc. This monitoring form is signed by PIC, EHS and Unit Head. The company shows monitoring form for the 2<sup>nd</sup> and 4<sup>th</sup> week of June and July 2019 of PPE compliance for 7 internship workers in Maintenance Division. All PPE delivered were reported complete and in good condition.
- Document Form No. FRM-EHS-059 (Rev. 00) about PPE condition monitoring and its implementation. The form has informed month of inspection, working unit, division/phase, PIC, list of checked workers, PPE compliance list checking, information of PPE condition and additional information, such as not wears and/or not brings PPE, etc. This monitoring form is signed by PIC, EHS, Supervisor and Unit Head. The company shows monitoring form for the 2<sup>nd</sup> and 4<sup>th</sup> week of May, June and July 2019 of 20 workers from TTK Plasma, 11 workers from BST Plasma and 19 FFB loading workers. All PPE delivered were reported complete and in good condition.
- Delivery of PPE Gloves for 31 upkeep workers from TTK Plasma which presented in document Form No. FRM-GEN-033 (Rev. 00) dated 13 May 2019. The form is signed by Unit Head, Phase head and Staff Incharge.
- Minutes of meeting which presented in document Form No. FRM-GEN-016 (Rev. 00) about socialization to workers about understanding of RSPO and PPE usage and monitoring that conducted at PLS IV Bawan in 13 May 2019, attended by 30 workers.
- Minutes of meeting which presented in document Form No. FRM-GEN-016 (Rev. 00) about socialization to workers about understanding of RSPO and PPE usage and monitoring that conducted at Muster Ground Plasma 1 TTK in 13 May 2019, attended by 53 workers.
- Minutes of meeting which presented in document Form No. FRM-GEN-016 (Rev. 00) about socialization to workers about understanding of RSPO and PPE usage and monitoring that conducted at AMP POM Meeting Room at 14 May 2019, attended by all internship workers.
- Minutes of meeting which presented in document Form No. FRM-GEN-016 (Rev. 00) about socialization to workers about understanding of RSPO and PPE usage and monitoring that conducted at AMP POM Gate in 15 May 2019, attended by all drivers and FFB loading workers.
- Form No. FRM-GEN-033 (Rev. 03) about earplug delivery to 7 internship workers in AMP POM.
- Picture documentation about Divices and PPE storage for pesticide applicators from TTK Plasma.

**Auditor conclusion:**

Description of root of cause and corrective action, as well as several correction evidence given are considered acceptable. However, please explain several auditor questions which marked on yellow highlight. Thus, NCR No. 2019.1 is still remain **open** until satisfactory auditee respons has achieve.

**Verification dated 09 August 2019**

The company shows revision of document No. FRM-EHS-009 (Rev. 00) dated 01 October 2011 to become dated 15 May 2019. Regarding HIRAC, the company give explanation as follows:

- There is no change of PPE for foot protection for FFB driver supplier and FFB loading workers from Tuah Sakato Organization, which required only working/rubber shoes.
- Matrix of PPE No. FRM-EHS-009 is exclusively used for workers, not third parties or supplier.
- The company shows matrix revision of PPE No. FRM-EHS-009 which differentiate from PPE matrix for internal workers.
- Monitoring of PPE usage for driver and FFB loading workers.

Based on explanation above, NCR No. 2019.1 is considered **closed**.

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

NCR No.	: 2019.02	Issued by	: Andi Pratama Pasaribu
Date Issued	: 11 May 2019	Time Limit	: ASA 1.3
NC Grade	: Minor	Date of Closing	: 09 August 2019
Standard Ref. & Requirement	: 4.7.6 All workers shall be provided with medical care, and covered by accident insurance (see criterion 6.5.3).		
Evidence observed (filled by auditor): Based on the results of a document review, it is known that the company has shown evidence that contractor workers at PT AMP Plantations have been protected under the BPJS Employment program. However, it cannot be shown that contractor workers at PT PMJ have been protected under the BPJS Employment program.			
Non-Conformance Description (filled by auditor): The company has not been able to prove that all contractors have been protected by work accident insurance.			
Root Cause Analysis (filled by organization audited): <ul style="list-style-type: none"><li>There is no effective control to ensure “BPJS Ketenagakerjaan” is registered and paid by the contractor for its workforce.</li></ul>			
Correction (filled by organization audited): <ul style="list-style-type: none"><li>Registering and paying “BPJS Ketenagakerjaan” for ongoing projects handled by the same contractor and “BPJS Ketenagakerjaan” payments for projects being undertaken by other ongoing contractors.</li><li>Request a list of members and proof of payment of the “BPJS Ketenagakerjaan” to the contractor before the company makes work payments.</li></ul>			
Corrective Action (filled by organization audited): <ul style="list-style-type: none"><li>Make the first payment to the contractor now for the first month of project work by requesting proof of registration and paying “BPJS Ketenagakerjaan” as one of the conditions and attaching proof of payment of membership contributions to the contractor workers to “BPJS Ketenagakerjaan” when payment of the work of the contractor</li><li>Control the selection of contractors in accordance with established requirements</li><li>Establish PIC to control “BPJS Ketenagakerjaan” registration from the Contractor is the Head of Operating Unit (POU) of PT PMJ</li></ul>			
Assessor Evaluation and Conclusion (filled by auditor):			
Verification July 23, 2019			

The company has sent evidence of improvement in accordance with the root cause, the corrective and corrective actions given, namely:

- Cooperation Agreement Letter between PT PMJ and KUD Damai Sejahtera for TBS transportation activities.
- Proof of payment of the "BPJS Ketenagakerjaan" for the period June 2019 on June 24, 2019 for KUD Damai Sejahtera workers
- List of KUD Damai Sejahtera Workers along with their "BPJS Ketenagakerjaan" Card
- Proof of Payment of "BPJS Ketenagakerjaan" for the period June 2019 on June 15, 2019 for CV Cahaya Asia Negeri workers
- List of workers for CV Cahaya Asia Negeri along with their "BPJS Ketenagakerjaan" Card

Based on the evidence of the above improvements, there is still some information needed by the auditor team in relation to the corrective actions provided. Based on this, the non-conformity No. 2019.02 declared Unfulfilled.

#### **Verification on August 9, 2019**

The company has responded to requests for information needed by the auditor along with sending evidence of corrections, including:

- The control mechanism for fulfilling "BPJS Ketenagakerjaan" registration obligations for contractor workers through the addition and revision of work agreements to the "BPJS Ketenagakerjaan" compliance article.
- Evidence of a revision of the work agreement with the contractors as the application of the control mechanism that is owned.
- Monitoring list of local contractors along with proof of registration for the "BPJS Ketenagakerjaan" program

Based on the evidence of improvement and information that has been given, **the non-conformity No. 2019.02 has comply and will be observed in the next assessment.**

**Verified by** : **Andi Pratama Pasaribu**

NCR No.	:	2019.03	Issued by	:	Andi Pratama Pasaribu
Date Issued	:	11 May 2019	Time Limit	:	10 August 2019
NC Grade	:	Major	Date of Closing	:	09 August 2019
Standard Ref. & Requirement	:	6.5.2 Collective Labor Agreement/Company Regulation, in accordance with the manpower regulations, shall be available in understandable language; and explained by the management or Labor Union to the workers.			
Evidence observed (filled by auditor): There are several facts found by the auditor team during the audit as follows:					
<ul style="list-style-type: none"><li>Results of public consultations with the Office of PTSP (One-Stop Integrated Service) and Employment of Agam Regency, Pasaman Barat District Manpower Office and Regional Worker Supervisor II of the West Sumatra Province Manpower and Transmigration Office, found that there were reports of overtime payments that were not in accordance with regulations / legislation at PT AMP Plantation.</li><li>Based on a review of the security pick-up schedule documents in March and April 2019 in AMP I, AMP II, AMP III, and PT PMJ it is known that short days in one week are Saturday (working only 5 hours), picket security is 3 shifts (7 working hours and 1 hour break). Security who work on Saturdays only get 1 mandays salary and do not get 2 hours overtime.</li></ul>					
Non-Conformance Description (filled by auditor): The company has not been able to show evidence that all workers who work outside working hours (overtime) have received overtime wages in accordance with Decree of Manpower Minister No. 102/2004 about overtime work and					



wages for overtime.

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

- The absence of equality of perception of the information submitted by the Regional Office Chairman to the Operating unit regarding the shortest working hours (Saturday) for security working hours that work for 5 hours so there is an excess of 2 hours of work not yet paid according to applicable regulations.

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

- The company will pay the shortage of security employee overtime wages on the shortest working day (Saturday) of 2 working hours in accordance with Decree of Manpower Ministry No. 102 of 2004 concerning overtime work and overtime wages.
- The company will also set the correct calculation for overtime payments the following month in accordance with applicable regulations.
- Disseminating information to security workers related to the lack of overtime payments made in the previous months and will apply overtime payments in accordance with the legislation for the following month.

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

- Make a circular letter to the Operation Head unit regarding security working hours from Monday-Sunday
- To socialize to the PIC (POU & HRD) of each Operating Unit related to the shortest working hours (Saturday) for security workers.

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

**Verification July 23, 2019**

The company has determined the root cause, corrective and corrective actions to be taken, but the company has not provided evidence of improvement in accordance with this matter. In addition, there is still some information needed by the auditor team regarding the determination of corrective and corrective actions given. Based on this, the non-conformity No. 2019.03 declared Not Yet Fulfilled.

**Verification on August 9, 2019**

The company has responded to requests for information needed by the auditor along with sending evidence of corrections, including:

- Socialization of lack of overtime payments to security
- Socialization of overtime calculations in accordance with government regulations to the PIC of each unit
- Calculation of overtime payments for all security workers in June 2019 according to regulations
- Proof of payment of wages and overtime in June 2019 to security workers

Based on the evidence of improvement and information that has been given, **the non-conformity No. 2019.03 is declared to have been fulfilled and will be re-observed at the time of the next assessment.**

**Verified by** : **Andi Pratama Pasaribu**

**3.5.3 Opportunity for Improvement**

No	Ref. Std.	Description
1	4.4.2	Riparian management on cooperatives areas when replanting are conducted
2	5.1.1	There is different about 0.6 ha between areal statement and covered environmental study areas for Tompek Tapian Kandis cooperatives (511.78 ha vs 511.18 ha), regarding this difference company are encourage to consult with related agency
3	6.5.3	Ensure adequate water supply in the Tompek Tapian Kandis Cooperative housing

**3.5.4 Noteworthy Positive Components**

No	Descriptions
1	Providing clean water access by water depot for workers
2	Commitment and implementation for sustainable palm oil development
3	Achieve ISPO (no certificates MUTU-ISPO/022) on 2014

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

Public Issues (Institution/ NGO/Community)	Auditor Responses
<b>Gender Committee PT PMJ (Yenita Rosa &amp; Eli Suryani)</b> <ul style="list-style-type: none"> <li>Gender committees have been established since 2011, for now the management has 2 management periods.</li> <li>The current management is the management of the 2015-2020 period with the following management arrangements: <ul style="list-style-type: none"> <li>❖ Trustee: Herman Jufri</li> <li>❖ Chair: Yenita Rosa</li> <li>❖ Deputy: Elli Suryani</li> <li>❖ Secretary: Leni Marlina</li> <li>❖ Socialization Section: Pure</li> <li>❖ Consultation Section: Vina Zulviarni</li> </ul> </li> <li>The routine activities of gender committees are labor socio-organizational activities, gender, worker complaints and women's related company policies.</li> <li>During the last year there has never been a complaint regarding sexual harassment or domestic violence.</li> <li>Issues related to child labor and human rights violations have not yet existed until now.</li> <li>Gender committees and female workers are aware of the policies regarding maternity and childbirth leave and the prohibition for pregnant and lactating women to work in chemical-related work</li> </ul>	<p>According to document verification and interview with workers, there was no issues related to violation of the rights of woman</p> <p>From the results of interviews with workers, the company has implemented of Company Policies such as reproductive rights and prohibition of pregnant woman to work with chemical. It refer to criterion 6.9</p>
<b>Worker Cooperative PT PMJ (Yenita Rosa &amp; Eli Suryani)</b> <ul style="list-style-type: none"> <li>This cooperative was formed in August 2016 and until now the management is still held by the initial management.</li> <li>This cooperative is engaged in Warung Sembako and available facilities in the form of shops are provided for cooperative operations of the company.</li> <li>The current members of the cooperative are 33 people and the basic contribution is Rp. 100,000, - at the beginning of the establishment of the cooperative.</li> <li>Employee cooperatives operate for 2 hours every day which is at 15.00 - 17.00.</li> <li>The sale of basic necessities is carried out following market prices in general so as to provide convenience for shopping for workers and their families to meet their daily needs.</li> </ul>	<p>The certificate holder supports the establishment of worker cooperatives to facilitate access of employees to obtain food sources and daily needs.</p>
<b>SPSI PT Primatama Mulia Jaya (Rinto Iswandi &amp; Irfa Mirdalina)</b> <ul style="list-style-type: none"> <li>At present, the management period for the period 2019-2022 with the elected chairman is Hendri Warman, the representative of Rinto Iswandi and several other administrators.</li> <li>The minimum wage used today is the Minimum Wage of the Province of West Sumatra in 2019 amounting to Rp. 91,570.- / day or Rp. 2,289,250. - / month which is valid from 01 January 2019.</li> <li>For now all workers are permanent workers and there are no contract workers.</li> </ul>	<p>Minimum wage has been described in criterion 6.5.</p> <p>The company has paid labour social insurance and labour health insurance for all workers as written in indicator 4.7.6.</p> <p>Medical check up for workers has been described in indicator 4.6.11.</p> <p>PPE for all workers has been described in criterion 4.7</p>

Public Issues (Institution/ NGO/Community)	Auditor Responses
<ul style="list-style-type: none"> <li>Periodic health checks have been carried out by the company every year</li> <li>The wage scale is distinguished through working period benefits based on the work year of each worker.</li> <li>Provision of PPE is provided free of charge and given routine distribution twice a year and changes will be made if there is a damaged PPE.</li> <li>During the last one there has never been a complaint regarding sexual harassment or domestic violence.</li> <li>Issues related to child labor and human rights violations have not yet existed until now.</li> <li>During the past year there were no late salary payments and religious holiday allowance was always paid ontime</li> <li>SPSI has been registered with the Manpower Office</li> <li>Collective Labor Agreement for the 2019 period is in the process of being approved</li> <li>Labor union meetings have only been carried out incidentally if there are only complaints or labor issues, but for 2019 it is planned to be carried out regularly every 2 months.</li> </ul>	
<b>CV Cahaya Asia Negeri (Masrizal)</b> <ul style="list-style-type: none"> <li>Cooperation between local contractors is an activity of building houses, supplying sand &amp; stone, and other construction activities.</li> <li>In collaborating with the contractor the company always makes work agreements for each of these jobs</li> <li>Contractors are required to provide PPE for workers when working in a corporate environment</li> <li>Socialization related to OHS is given when the worker first works in the company's operational environment</li> <li>Socialization of the ethical code of ethics given at the time of signing the contract</li> <li>Payments are made according to time and there have been no delays in the form of payment.</li> <li>Communication is going pretty well and every time there is work there is always a supervisor from the company.</li> <li>Work accident insurance is given to workers in accordance with the validity period of the employment agreement.</li> <li>Local contractors located in Kp. Air Parit Rambah, Jorong Empat Koto Barat, Kinali District, West Pasaman Regency.</li> </ul>	<p>Based on document verification, show that the rights and obligation of each party has been set in the contract.</p> <p>Local contractor work agreement and deal has been describe in criteria 6.11</p>
<b>Gender Committee PT AMP Plantation (Gustina Dewi &amp; Nuraisyah)</b> <ul style="list-style-type: none"> <li>All workers working in the company are members of the gender committee</li> <li>The routine activities of gender committees are labor socio-organizational activities, gender, worker complaints and women's related company policies.</li> <li>During the last one there has never been a complaint regarding sexual harassment or domestic violence.</li> <li>Issues related to child labor and human rights violations have not yet existed until now.</li> </ul>	<p>According o document verification and interview with workers, there was no issues related to violation of the rights of woman</p> <p>From the results of interviews with workers, the company has implemented of Company Policies such as reproductive rights and prohibition of pregnant woman to work with chemical. It refer to criterion 6.9</p>

Public Issues (Institution/ NGO/Community)	Auditor Responses
<ul style="list-style-type: none"> <li>Complaints submitted to gender did not exist for the past year.</li> <li>Gender committees and female workers are aware of the policies regarding maternity and childbirth leave and the prohibition for pregnant and lactating women to work in chemical-related work</li> </ul>	
<b>CV Karya Muda Utama (Jeni Candra)</b> <ul style="list-style-type: none"> <li>Cooperation between local contractors is the construction of a water tank.</li> <li>In collaborating with the contractor the company always makes work agreements for each of these jobs</li> <li>Contractors are required to provide PPE for workers when working in a corporate environment</li> <li>Sosialisasi related to K3 is given when the worker first works in the company's operational environment</li> <li>Socialization of the ethical code of ethics given at the time of signing the contract</li> <li>Payments are made according to time and there have been no delays in the form of payment.</li> <li>Communication is going pretty well and every time there is work there is always a supervisor from the company.</li> <li>Work accident insurance is given to workers in accordance with the validity period of the employment agreement.</li> </ul>	<p>Based on document verification, show that the rights and obligation of each party has been set in the contract.</p> <p>Local contractor work agreement and deal has been describe in criteria 6.11</p>
<b>SPSI PT AMP Plantation (Anto Sugito &amp; Amir H.)</b> <ul style="list-style-type: none"> <li>Periodic health checks have been carried out by the company every year</li> <li>The minimum wage used today is the Minimum Wage of the Province of West Sumatra in 2019 amounting to Rp. 91,570.- / day or Rp. 2,289,250.- / month which is valid from 01 January 2019.</li> <li>For now all workers are permanent workers with KHT status and there are no contract workers.</li> <li>The wage scale is distinguished through working period benefits based on the work year of each worker.</li> <li>Provision of PPE is provided free of charge and given routine distribution twice a year and changes will be made if there is a damaged PPE.</li> <li>During the last one there has never been a complaint regarding sexual harassment or domestic violence.</li> <li>Issues related to child labor and human rights violations have not yet existed until now.</li> <li>During the past year there were no late salary payments and Religious Holiday Allowance was always paid ontime</li> <li>SPSI has been registered with the Manpower Office</li> <li>Collective Labor Agreement for the next period is under preparation</li> <li>Labor union meetings have only been carried out incidentally if there are only complaints or labor issues.</li> </ul>	<p>Minimum wage has been described in criterion 6.5.</p> <p>The company has paid labour social insurance and labour health insurance for all workers as written in indicator 4.7.6.</p> <p>Medical check up for workers has been described in indicator 4.6.11.</p> <p>PPE for all workers has been described in criterion 4.7</p>



Public Issues (Institution/ NGO/Community)	Auditor Responses
<b>SERBUNDO - Serikat Buruh Perkebunan Indonesia (Zuheri Syamsu, Fandara Laia &amp; Bambang Hariyono)</b> <ul style="list-style-type: none"> <li>Periodic health checks have been carried out by the company every year</li> <li>The minimum wage used today is the Minimum Wage of the Province of West Sumatra in 2019 amounting to Rp. 91,570.- / day or Rp. 2,289,250.- / month which is valid from 01 January 2019.</li> <li>For now all workers are permanent workers with KHT status and there are no contract workers.</li> <li>The wage scale is distinguished through working period benefits based on the work year of each worker.</li> <li>Provision of PPE is provided free of charge and given routine distribution twice a year and changes will be made if there is a damaged PPE.</li> <li>During the last one there has never been a complaint regarding sexual harassment or domestic violence.</li> <li>Issues related to child labor and human rights violations have not yet existed until now.</li> <li>During the past year there were no late salary payments and THR was always paid ontime</li> <li>SERBUNDO has been registered with the Manpower Office</li> <li>Collective Labor Agreement for the next period is under preparation</li> <li>Labor union meetings have only been carried out incidentally if there are only complaints or labor issues.</li> </ul>	<p>Minimum wage has been described in criterion 6.5.</p> <p>The company has paid labour social insurance and labour health insurance for all workers as written in indicator 4.7.6.</p> <p>Medical check up for workers has been described in indicator 4.6.11.</p> <p>PPE for all workers has been described in criterion 4.7</p>
<b>One Stop Service and Labor Agency of Agam District (4 person):</b> <ul style="list-style-type: none"> <li>There was an issues regarding to overtime payment that submitted by some employee directly to the labor agency of Agam District.</li> <li>There was no addition of registration of temporary worker so far.</li> </ul>	<p>About the overtime payment it has been describe in indicator 6.5.2</p> <p>About the registration of temporary worker there are no temporary worker at company.</p>
<b>Environment Agency of Agam District (2 person)</b> <ul style="list-style-type: none"> <li>The company and it supply based reported their environmental monitoring report in time.</li> <li>There is no environmental issues submitted so far.</li> <li>There is a report of field visit by environmental agency of Agam District team. All findngs has been resolved and reported by management.</li> </ul>	<p>About the environment aspect it has been describe in criteria 5.1</p>
<b>National Land Agency of Agam District (3 person)</b> <ul style="list-style-type: none"> <li>All concession area has been covered with land title (HGU) according to the national regulation.</li> <li>There is no land dispute issues or conflict submitted so far.</li> </ul>	<p>The company has had land title which covering all of their operational area. There is no information</p>

Public Issues (Institution/ NGO/Community)	Auditor Responses
<b>Plantation Agency of Pasaman Barat District (2 person)</b> <ul style="list-style-type: none"> <li>The company and its supply bases located in Pasaman Barat District has had plantation permit.</li> <li>The company has had smallholder engagement with surrounding communities near the concession area. Even though there are some land dispute issues with the customary leader.</li> </ul>	<p>It has been described in criteria 2.2</p>
<b>Labor Inspector of Sumatera Barat II (1 person)</b> <ul style="list-style-type: none"> <li>According to last visit, labor inspector allegedly a non-conformance of labor payment especially for security team.</li> <li>AMP POM should be prepared to mill act renewal and heavy weight operator license.</li> <li>There are issues regarding to employee's mutation.</li> </ul>	<p>About the overtime payment it has been described in indicator 6.5.2</p> <p>About the renewal of heavy weight operator license has been described in indicator 2.1.1 and 4.7.3</p>
<b>Labor Agency of Pasaman Barat District (2 person)</b> <ul style="list-style-type: none"> <li>There are no labor dispute issues submitted so far.</li> <li>There are no new registrations of temporary workers.</li> </ul>	<p>About the registration of temporary workers and labor issues there are no issues at company.</p>
<b>Village Head and Community Leader of Tompek Tapan Kandi (2 person)</b> Syafril (Wali Jorong Kinali) M. Dt Bunsu (Ninik Mamak Kinali) <ul style="list-style-type: none"> <li>During the land acquisition process they still not a customary or village leader yet. But they know that the company was accepted during the process.</li> <li>The company's existence brings the good impact. Especially to empowering local income, access on transportation, education etc. AMP POM also received FFB from smallholder like them.</li> <li>The company shares their profit to the community through the corporate social responsibility program annually based on community's needs or propose.</li> </ul>	<p>It has been described in criteria 2.2</p>
<b>Previous Land Owner and Community Leader "Ninik Mamak" Jorong VI Selatan (1 person)</b> H. Mansur Dt. Itam Putih (Ninik Mamak Kinali) <p>Land acquisition process has passed the mutual agreement when 30% of area will be a smallholder scheme. Land compensated (named Silih Jariah) has been paid timely.</p>	<p>It has been described in criteria 2.2</p>
<b>Previous Land Owner and Community Leader "Ninik Mamak" Jorong IV Koto and Langgam Kinali (2 person)</b> Ilyas Majo Sadeo (Ninik Mamak/Urek Tunggang Langgam Kinali) Darusamad DT Bando Kayo (Ninik Mamak Jorong IV Koto) <p>At the early 1990, the local government had a plan to invite the investor to the Pasaman District. On 1996, after a long negotiation, Ninik Mamak Kinali agreed to handover their land to the plantation company with agreement.</p>	<p>It has been described in criteria 2.2</p>

Public Issues (Institution/ NGO/Community)	Auditor Responses
<ul style="list-style-type: none"> <li>From ± 7.550 Ha that handover, 70% of it had compensated (Silih Jariah) and the rest 30% will be back to the community as scheme smallholder.</li> <li>There is only ± 2,000 Ha area that can be planted for own estate and ± 1,300 Ha for scheme smallholder. Than happen due to the area has occupied by local people.</li> <li>This case caused a internal problem between Ninik Mamak that not resolved yet until now.</li> </ul>	
<b>Village Head of Jorong Wonosari (1 person)</b> Asroni (Wali Jorong)  No issues	It has been fullfiled
<b>Previous Land Owner and Community Leader “Ninik Mamak” Jorong Tompek Tapian Kandih (1 person) and Board of Cooperation KUD Tompek Tapian Kandih (1 person)</b> Damir DT Marajo (Ninik Mamak Tompek Tapiah Kandis)  During the land acquisition process, after a long discussion with his clan, Ninik Mamak Tompek Tapiah Kandis agreed to handover their land to convert to palm oil plantation.  There is no land dispute between Ninik Mamak Tompek Tapiah Kandis with the company.  Regarding to land demarcation, Ninik Mamak Tompek Tapiah Kandis agreed to not installing boundary poles of each SHM. However, there is no dispute on that.	It has been describe in criteria 2.2
<b>The Nagari Institute – affialiate with The Forest Peoples Programme</b> Zulkifli SH (Lawyer)  Based on interview found some information as follows: <ul style="list-style-type: none"> <li>During the 1990, the local government both Agam and Pasaman to increasing local income by invite the investor to open the palm oil plantation. But, most of agreement between the investor and local people (customary people) are not predicted the impact in the future.</li> <li>At the same time, Minangnese people who had a land communal concept when Ninik Mamak had a private right to manage their customary land to other. The Ninik Mamak agreed to convert their land into palm oil plantation with 70:30 scheme. Mean, 30% of land will be back to their clan as scheme smallholder plantation.</li> <li>During the negotiation process, there is 5 Ninik Mamak that signed the handover statement letter. There is a problem with the total of land that can be planted due to occupation of local</li> </ul>	It has been describe in criteria 2.2

Public Issues (Institution/ NGO/Community)	Auditor Responses
<p>people. The impact is, the 30% area were disputed between the Ninik Mamak.</p> <ul style="list-style-type: none"> <li>Ninik Mamak and their clan has got the advocacy by the law institution even they are always lose in the court. Based on that fact, they tried to bring this case to the RSPO forum.</li> </ul>	
<p><b>Previous Land Owner and Community Leader “Ninik Mamak” Nagari Bawan (2 person)</b></p> <ul style="list-style-type: none"> <li>Negotiation process has been start on 1990 and finished with the 70:30 agreement. The handover statement letter signed by 25 Ninik Mamak on 1993.</li> <li>There is land dispute on that area so far.</li> </ul>	<p>It has been describe in criteria 2.2</p>
<p><b>Cooperative Board of Bukit Sandiang Tigo (1 Person)</b> Cooperative Secretary</p> <ul style="list-style-type: none"> <li>Board of cooperative is now handled by ex smallholder which does not technically-connected with the Ninik Mamak.</li> <li>The ex smallholder cannot proceeded their land title due to no agreement with Ninik Mamak to proceed that.</li> <li>There is no land dispute with the management.</li> </ul>	<p>It has been describe in criteria 2.2</p>

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


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

Signed on behalf of:

PT AMP Plantation  
Asistant General Manager

  
**Jeffry Gugkang**  
Friday, 09 August 2019

PT Mutuagung Lestari  
Lead Auditor

  
**Andi Pratama Pasaribu**  
Friday, 09 August 2019



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

No	Institution/NGO/Community	Address	Phone/Email	Form of Communication	Date of Contact	Response	
						Yes	No
1	WWF (World Wildlife Fund for Nature)	Indonesia	-	Quisioner Via Email	01 <sup>st</sup> May 2019		✓
2	WALHI (Wahana Lingkungan Hidup Indonesia)	Indonesia	-	Quisioner Via Email	01 <sup>st</sup> May 2019		✓
3	Sawit Watch	Indonesia	-	Quisioner Via Email	01 <sup>st</sup> May 2019		✓
4	AMAN (Aliansi Masyarakat Adat Nusantara)	Indonesia	-	Quisioner Via Email	01 <sup>st</sup> May 2019		✓
5	National Land Agency	Agam District, Province of West Sumatera	-	Interview	06 <sup>th</sup> May 2019	✓	
6	Plantation Agency	Agam District, Province of West Sumatera	-	Interview	06 <sup>th</sup> May 2019	✓	
7	"Pelayanan Terpadu Satu Pintu dan Ketenagakerjaan"	Agam District, Province of West Sumatera	-	Interview	06 <sup>th</sup> May 2019	✓	
8	Labor Inspector	Pasaman Barat District, Province of West Sumatera	-	Interview	07 <sup>th</sup> May 2019	✓	
9	Plantation Agency	Pasaman Barat District, Province of West Sumatera	-	Interview	07 <sup>th</sup> May 2019	✓	
10	Labour Union of PT AMP Plantation	PT AMP Plantation	-	Interview	06 <sup>th</sup> – 08 <sup>th</sup> May 2019	✓	
11	Employee Cooperative of PT AMP Plantation	PT AMP Plantation	-	Interview	06 <sup>th</sup> – 08 <sup>th</sup> May 2019	✓	
12	Gender Committee of PT AMP Plantation	PT AMP Plantation	-	Interview	06 <sup>th</sup> – 08 <sup>th</sup> May 2019	✓	
13	Local Contractor	Agam District, Province of West Sumatera	-	Interview	06 <sup>th</sup> – 08 <sup>th</sup> May 2019	✓	
14	Labour Union of PT Primatama Mulia Jaya	PT Primatama Mulia Jaya	-	Interview	06 <sup>th</sup> – 08 <sup>th</sup> May 2019	✓	
15	Employee Cooperative of PT Primatama Mulia Jaya	PT Primatama Mulia Jaya	-	Interview	06 <sup>th</sup> – 08 <sup>th</sup> May 2019	✓	
16	Gender Committee of PT Primatama Mulia Jaya	PT Primatama Mulia Jaya	-	Interview	06 <sup>th</sup> – 08 <sup>th</sup> May 2019	✓	
17	Costumary Land (Ninik Mamak) of Kinali	Nagari Kinali	-	Interview	7 <sup>th</sup> May 2019	✓	
18	Village Head of Wonosari	Wonosari	-	Interview	7 <sup>th</sup> May 2019	✓	
19	Costumary Land (Ninik Mamak) of Nagari Salareh Aia	Nagari Salareh Aia	-	Interview	8 <sup>th</sup> May 2019	✓	
20	Costumary Land (Ninik Mamak) of Jorong IV Selatan	Jorong IV Selatan	-	Interview	8 <sup>th</sup> May 2019	✓	
21	Costumary Land (Ninik Mamak) of Nagari Bawan	Nagari Bawan	-	Interview	8 <sup>th</sup> May 2019	✓	
22	Masyarakat Adat Luhak Spokesman/The Nagari Institute	Simpang Empat	-	Interview	9 <sup>th</sup> May 2019	✓	

23	Board of Cooperatives Tompek Tapani Kandis and Bukit Sandiang Tigo	Nagari Salareh Aia and Nagari Bawan	-	Interview	9 <sup>th</sup> May 2019	✓	
24	Local Contractor	Pasaman Barat District, Province of West Sumatera	-	Interview	06 <sup>th</sup> – 08 <sup>th</sup> May 2019	✓	
25	AMP 1 Estate: <ul style="list-style-type: none"> <li>• 1 tractor driver</li> <li>• 6 pesticide applicators</li> <li>• 5 fertilizer applicators</li> <li>• 1 harvesting clerk</li> <li>• 2 harvesters</li> </ul> AMP POM: <ul style="list-style-type: none"> <li>• 3 warehouse workers, 3 workshop workers</li> <li>• 3 grading worker</li> <li>• 3 operation worker</li> <li>• 2 security</li> <li>• 2 weighbridge officer</li> </ul>	PT AMP Plantation	-	Interview	06 <sup>th</sup> – 08 <sup>th</sup> May 2019	✓	
26	<ul style="list-style-type: none"> <li>• 2 P&amp;D workers</li> <li>• 3 harvesters</li> <li>• 3 fertilizer applicators</li> </ul>	PT Primatama Mulia Jaya	-	Interview	06 <sup>th</sup> – 08 <sup>th</sup> May 2019	✓	
27	<ul style="list-style-type: none"> <li>• 2 Harvesting Worker</li> <li>• 5 selective weeding worker (4 man and 1 woman)</li> </ul>	KUD Tompek Tapani Kandis	-	Interview	06 <sup>th</sup> – 08 <sup>th</sup> May 2019	✓	
28	<ul style="list-style-type: none"> <li>• 2 harvest worker</li> <li>• 2 foreman harvesting</li> <li>• 2 loosefruit pickers</li> </ul>	KUD Bukit Sandiang Tigo	-	Interview	06 <sup>th</sup> – 08 <sup>th</sup> May 2019	✓	

**Appendix 2. Assessment Program**

Date	5 – 11 May 2019	
Actual Duration	AUDIT PROCESS	AUDITOR
<b>Sunday, 5 May 2019</b>		
06.10 – 08.05	<b>JAKARTA → PADANG (GA-124)</b> <b>PADANG → SITE PT. AMP PLANTATION</b>	<b>All Auditor</b>
<b>Monday, 6 May 2019</b>		
08.00 – 09.00	<b>OPENING MEETING</b> Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Determine of Field Visit, Transparency and Confidentiality Clarification)	<b>All Auditor</b>
09.00 – 12.00	<b>Stakeholders consultation to</b> Government Institution in Agam District	<b>APP</b>
09.00 - 12.00	<b>Field Observation AMP 2 ESTATE</b> <ul style="list-style-type: none"> <li>Best agricultural practices (manuring, spraying, harvesting, EFB application etc)</li> <li>Worker Welfare (payments, complaint mechanism)</li> <li>Hazardous Waste Material (B3) management; worker facilities (housing, health clinic, clean water, etc), Land fill, Fire fighting facilities, Storage, ect.</li> <li>Legal operational and Conservation Area</li> </ul>	<b>AMR/RGR</b> <b>AMR/RGR</b> <b>STV</b> <b>STV</b>
12.00 – 12.00	<b>BREAK</b>	<b>All Auditor</b>
14.00 – 17.00	<ul style="list-style-type: none"> <li>Stakeholder consultation with previous land owner, local communities surrounding the plantation area.</li> <li>Review of Previous Visit Non-conformance (ASA-1.1); Document Review; Time Bound Plan and Partial Certification</li> </ul>	<b>APP</b> <b>All Auditor</b>
<b>Tuesday, 7 May 2019</b>		
08.00 – 12.00	<b>Field Observation PRIMATAMA MULIA JAYA ESTATE</b> <ul style="list-style-type: none"> <li>Best agricultural practices (manuring, spraying, harvesting, EFB application etc)</li> <li>Worker Welfare (payments, complaint mechanism)</li> <li>Hazardous Waste Material (B3) management; Worker facilities (housing, health clinic, clean water, etc), Land fill, Fire fighting facilities , Storage, ect.</li> <li>Legal operational and Conservation Area</li> </ul> <b>Stakeholders consultation to</b> Government Institution in Pasaman Barat District	<b>AMR/RGR</b> <b>AMR/RGR</b> <b>STV</b> <b>STV</b> <b>APP</b>
12.00 – 12.00	<b>BREAK</b>	<b>All Auditor</b>
14.00 – 17.00	<b>Stakeholders consultation to stakeholder of PRIMATAMA MULIA JAYA ESTATE:</b> <ol style="list-style-type: none"> <li>Gender committee, labour union,</li> </ol>	<b>RGR/AMR</b>

	b. Nearest village, local communities and previous land owner  <b>Document Review</b>	<b>APP</b>  <b>All Auditor</b>
<b>Wednesday, 8 May 2019</b>		
08.00 – 12.00	<b>Field Observation TOMPEK TAPIAH KANDIS COOPERATIVE</b> <ul style="list-style-type: none"> <li>Best agricultural practices (manuring, spraying, harvesting, EFB application etc)</li> <li>Worker Welfare (payments, complaint mechanism)</li> <li>Hazardous Waste Material (B3) management; Worker facilities (housing, health clinic, clean water, etc), Land fill, Fire fighting facilities , Storage, ect.</li> <li>Legal operational and Conservation Area</li> </ul> <b>Stakeholders consultation to stakeholder of TOMPEK TAPIAH KANDIS COOPERATIVE</b> <ul style="list-style-type: none"> <li>a. Gender committee, labour union</li> <li>c. Local communities, board of cooperatives</li> </ul>	<b>AMR/RGR</b>  <b>AMR/RGR</b> <b>STV</b>  <b>APP</b>   <b>APP</b> <b>APP</b>
12.00 – 14.00	<b>BREAK</b>	<b>All Auditor</b>
14.00 – 17.00	<b>Document Review</b>	<b>All Auditor</b>
<b>Thursday, 9 May 2019</b>		
08.00 – 12.00	<b>Field Observation BUKIT SANDIANG TIGO COOPERATIVE</b> <ul style="list-style-type: none"> <li>Best agricultural practices (manuring, spraying, harvesting, EFB application etc)</li> <li>Worker Welfare (payments, complaint mechanism)</li> <li>Hazardous Waste Material (B3) management; Worker facilities (housing, health clinic, clean water, etc), Land fill, Fire fighting facilities , Storage, ect.</li> <li>Legal operational and Conservation Area</li> </ul> <b>Stakeholders consultation to stakeholder of BUKIT SANDIANG TIGO COOPERATIVE</b> <ul style="list-style-type: none"> <li>b. Gender committee, labour union</li> <li>d. Local communities, board of cooperatives</li> </ul>	<b>AMR/RGR</b>  <b>AMR/RGR</b> <b>STV</b>  <b>APP</b>   <b>APP</b> <b>APP</b>
12.00 – 12.00	<b>BREAK</b>	<b>All Auditor</b>
14.00 – 17.00	<b>Document Review</b>	<b>All Auditor</b>
<b>Friday, 10 May 2019</b>		
08.00 – 12.00	<b>Field Observation to AMP POM</b> <ul style="list-style-type: none"> <li>Process Station, Safety Aspect and Worker Welfare (Grading – despatch)</li> <li>ETP; WTP; Hazardous Waste Warehouse; Drainage; Collecting place of fiber, Water Discharge, Hazardous Warehouse; Workshop, Chemical Store.</li> <li>Supply Chain</li> </ul>	<b>AMR/RGR</b> <b>STV</b>  <b>APP</b>
12.00 – 14.00	<b>BREAK</b>	<b>All Auditor</b>
14.00 – 17.00	<b>Document Review</b>	<b>All Auditor</b>
<b>Saturday, 11 May 2019</b>		
08.00 – 11.00	<b>Closing meeting</b>	<b>All Auditor</b>

11.00 – 15.00	Site → PADANG	All Auditor
16.40 – 18.35	PADANG → JAKARTA (GA-167)	All Auditor