

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

【✓】 Recertification

Name of Management : Agronusa Investama POM – PT Agronusa Investama subsidiary of
Organisation Wilmar International, Ltd

Plantation Name : Agronusa Investama Estate, Sentama Lestari Smallholder and
Cempaka Biru Smallholder

Location : Semanga Village, Sejangkung Sub-District, Sambas District, Kalimantan
Barat Province, Indonesia

Certificate Code : MUTU-RSPO/024

Date of Certificate Issue : 14 November 2019 Date of License Issue : 14 November 2019

Date of Certificate Expiry : 13 November 2024 Date of License Expiry : 13 November 2020

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
RC	27 to 30 November 2018	Andi Pratama Pasaribu (Lead Auditor), Ebnu Holdoon Shawal, Satria Adi Putra, Bayu Yogatama	Ganapathy Ramasamy	Ardiansyah

Assessment	Approved by MUTUAGUNG LESTARI on:
RC	14 November 2019

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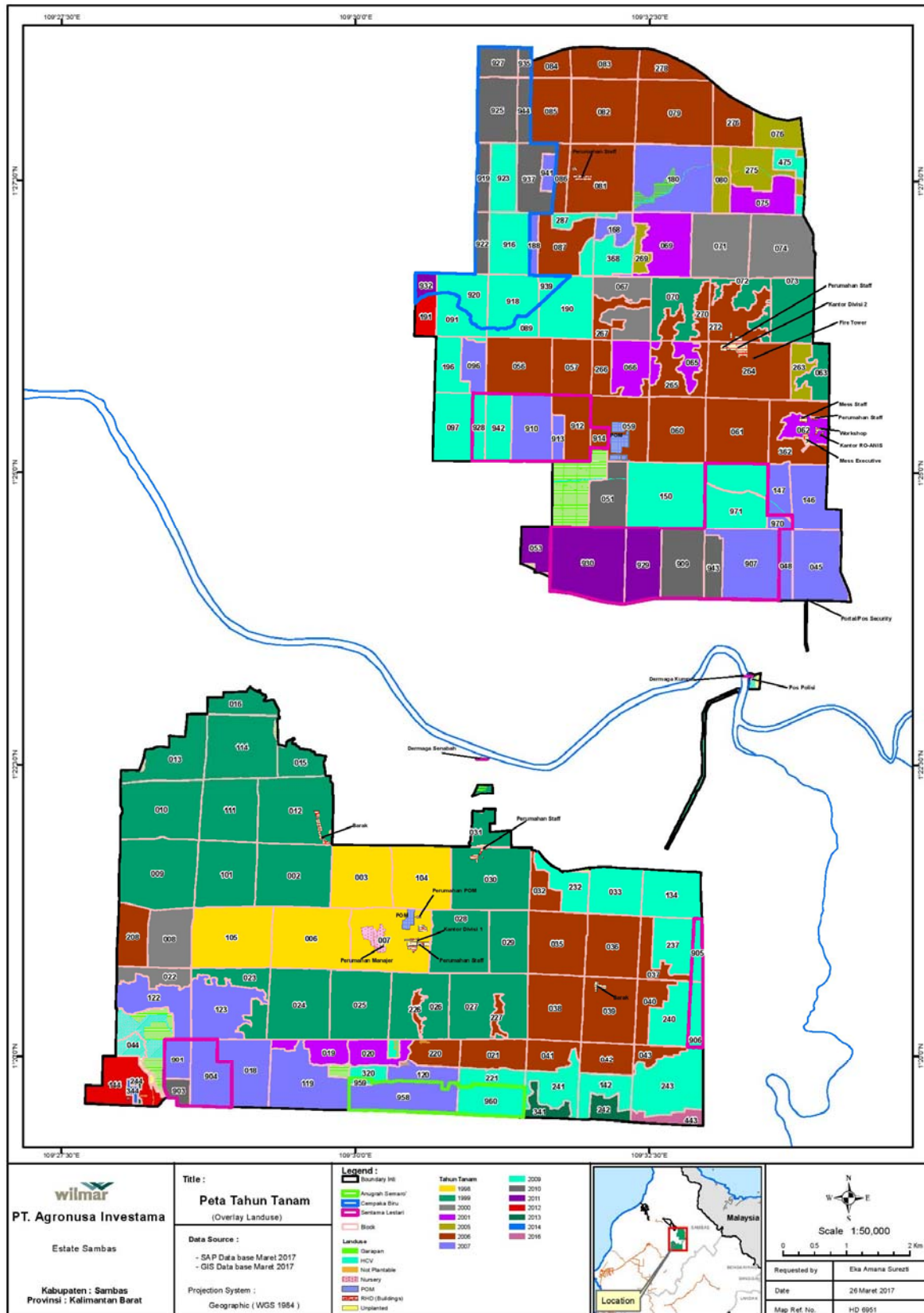
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FIGURE

Figure 1. Location Map of PT Agronusa Investama



Figure 2. Operational Map of PT. Agronusa Investama



Glossary

ANI	:	Agronusa Investama
BLH	:	<i>Badan Lingkungan Hidup</i> (environment agency)
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i> (Social Security Agency)
CPO	:	Crude Palm Oil
EFB	:	Empty Fruit Bunch
FFB	:	Fresh Fruit Bunch
FGD	:	Focus Group Discussion
HRGA	:	Human Resources and General Affair
HCV	:	High conservation value
IPM	:	Integrated Pest Management
LB3	:	<i>Limbah berbahaya dan beracun</i> (hazardous waste)
LCC	:	Legume cover crop
MSDS	:	Material Safety Data Sheet
NGO	:	Non Government Organization
OHS	:	Occupational Health and Safety
P2K3	:	<i>Panitia Pembina Keselamatan dan Kesehatan Kerja</i> (OHS Committee)
POM	:	Palm Oil Mill
PP	:	<i>Peraturan pemerintah</i> (Government regulation)
PPE	:	Personal Protective Equipment
SDC	:	System Development Control
SIA	:	Social Impact Assessment
SOP	:	Standar Operational Procedure
TPS LB3	:	<i>Tempat Penyimpanan Sementara LB3</i> (Hazardous Waste Storage)
WHO	:	World Health Organization
WTP	:	Water Treatment Plant
WWTP	:	Waste water treatment pond

1.0 SCOPE OF THE CERTIFICATION ASSESSMENT				
1.1 Assessment Standard Used				
	<ul style="list-style-type: none"> Indonesian National Interpretation of RSPO Principles and Criteria 2013 by INA-NITF (Indonesian National Interpretation Task Force) July 2016, endorsed by the RSPO Board of Governor 30th September 2016. RSPO Certification Systems for Principles & Criteria June 2017. Endorsed by the RSPO Board of Governors on 14th of June 2017. The RSPO Supply Chain Certification Standard for Organization seeking or holding certification adopted by the RSPO Board of Governors on 21 November 2014 (Revised on 14 June 2017). 			
1.2 Organisation Information				
1.2.1	Organisation name listed in the certificate	PT Agronusa Investama – Wilmar International, Ltd		
1.2.2	Contact person	Perpetua George		
1.2.3	Organisation address and site address	RSPO registered company 56.Neil Road Singapore, Singapore 088 030 (65) 6216-0244 Office Jakarta: Multivison Tower Lt. 15 Jl. Kuningan Mulia Block B9, Kuningan, Jakarta 12980 – Indonesia		
1.2.4	Telephone	(62-21) 2938 - 0777		
1.2.5	Fax	-		
1.2.6	E-mail	jules.parapat@id.wilmar-intl.com		
1.2.7	Web page address	www.wilmar-international.com		
1.2.8	Management Representative who completed the application for certification	Jules Sonny Parapat (Indonesia Certification Lead)		
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	Palm Oil Mill and supply base ANI Sambas POM, ANI Sambas Estate, Sentama Lestari Cooperative and Cempaka Biru Cooperative		
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
	ANI POM	Semanga Village, Sejangkung Sub-District, Sambas District, Kalimantan Barat Province, Indonesia	N 01° 25' 15"	E 109° 32' 14"
1.4.2	Location of Certification Scope of Supply Base			
	Name of Supply Base	Location	Coordinate	
			Latitude	Longitude
	ANI-Sambas Estate	Semanga Village, Sejangkung Sub-	N 01° 25' 20"	E 109° 33' 57"

	District, Sambas District, Kalimantan Barat Province, Indonesia		
Sentama Lestari Cooperative (999 Smallholders)	Semakuan Village, Semanga Village, Sejangkung Sub-District, Sambas District, Kalimantan Barat Province, Indonesia	N 01° 20' 57"	E 109° 30' 30"
Cempaka Biru Cooperative (226 smallholders)	Sajingan Kecil Village, Semanga Village, Sejangkung Sub-District, Sambas District, Kalimantan Barat Province, Indonesia	N 01° 27' 32"	E 109° 31' 55"

1.5 Description of Area Statement

1.5.1	Tenure	
	• State	14,000 * Ha
	• Community	- Ha

**based on Plantation Business Permit (IUP) based Sambas Regency Decree No. 372 of 2008*

1.5.2 Area Statement

		ANI Estate (Ha)	Sentama Lestari (Ha)	Cempaka Biru (Ha)	Total Area (Ha)
• Total area		6,986.50	935.29	469.82	8,391.61
• Mature area		5,600.97	907.93	451.46	6960.36
• Immature area		747.97	-	-	747.97
• Mill		16.74	-	-	16.74
• Road, Housing, Drainage		246.34	22.23	13.24	281.81
• Nursery		8.50	-	-	8.50
• Occupation		-	-	-	-
• Land Clearing Area		275.41	-	-	275.41
• Not Plantable Area		42.37	1.47	-	43.84
• HCV		48.20	3.66	5.12	56.98
• *HCV in Planted area		4.83	-	-	4.83
• *Total HCV		53.03	3.66	5.12	61.81

** Source: hectare statement per November 2019*

1.6 Planting Year and Cycles

1.6.1	Age profile of planting year				
	Planting Year	Hectarage (Ha)			
		ANI Estate	Sentama Lestari	Cempaka Biru	Total
	1998	179.18	-	-	179.18
	1999	1,169.46	-	-	1,169.46
	2000	340.24	-	-	340.24
	2001	284.97	-	-	284.97
	2005	150.39	-	-	150.39
	2006	1,922.00	56.75	-	1,978.75
2007	610.73	346.62	12.30	969.65	

	2009	788.28	197.31	248.07	1,233.66		
	2010	52.63	115.94	179.40	347.97		
	2011	-	191.31	11.69	203		
	2012	63.68	-	-	63.68		
	2013	39.41	-	-	39.41		
	Subtotal Mature Area	5,600.97	907.93	451.46	6,960.36		
	2016	19.29	-	-	19.29		
	2018	352.69	-	-	352.69		
	2019	375.99	-	-	375.99		
	Subtotal Immature Area	747.97	-	-	747.97		
	TOTAL	6,348.94	907.93	451.46	7,708.33		
1.6.2	New Planting area after January 2010						
1.6.3	Planting Cycle		2 nd Cycle				
1.7	Description of Mill and Supply Base						
1.7.1	Description of Mill						
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel	
				Out put (ton)	Extraction (%)	Out put (ton)	Extraction (%)
	ANI POM	60	158,206.27	30,984.35	19.59	7,662.89	4.85
	<i>*Production data source from December 2017 to November 2018</i>						
1.7.2	Description of Certification Scope of Supply Base						
	Name of Estate	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/ year)	Supplied to Mill	
						FFB (tonnes/year)	%
	ANI Estate	6,986.50	6,348.94	123,764.99	22.09	123,764.99	100
	Sentama Lestari Cooperative (999 Smallholders)	935.29	907.93	11,189.39	12.32	11,189.39	100
	Cempaka Biru Cooperative (226 smallholders)	469.82	451.46	5,629.55	12.46	5,629.55	100
	TOTAL	8,391.61	7,708.33	140,583.93	20.19	140,583.93	100
	<i>*Production data source from December 2017 to November 2018</i>						
1.7.3	FFB description from other source						
	Name of sources	Organisation	Location		Supplied to Mill		
					FFB (tonnes/year)		
	Srimaram	Independent Outgrower (RSPO Non-Certified)	Sambas District, Kalimantan Barat Province, Indonesia		2,885.90		
	Anugrah Semaro Cooperative				1,347.27		
	Serimaram Cooperative				428.29		

	Kumpai Cooperative			2,662.41			
	Independent Smallholder			10,298.44			
	TOTAL			17,622.33			
	<i>*Production data source from December 2017 to November 2018</i>						
1.7.4	Product categories	FFB, CPO, PK					
1.8	Estimate Tonnage of Certified Product						
1.8.1	Past Annual Claim Certified Product	Previous Certificate Claim (tonnes/year)	Actual certified product (tonnes/year)				
	• FFB Production	163,161	140,583.93				
	• CPO Production	32,632	27,540.39				
	• Palm Kernel (PK) Production	6,526	6,396.56				
1.8.2	Product selling						
	Tonnage of selling product	Period of actual selling product 12 months before audit					
	• CSPO sold as RSPO certified product	0					
	• CSPK sold as RSPO certified product	0					
	• CSPO sold under other scheme	0					
	• CSPK sold under other scheme	0					
	• CSPO sold as conventional	26,040					
	• CSPK sold as conventional	5,896					
1.8.3	Estimate of Certified FFB Claim						
	Name of Estates	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)		
	ANIS Estate	6,986.50	6,348.94	129,953	23.20		
	Sentama Lestari Cooperative (999 Smallholders)	935.29	907.93	11,748	13.09		
	Cempaka Biru Cooperative (226 smallholders)	469.82	451.46	5,911	12.94		
	TOTAL	8,391.61	7,708.33	147,612	21.20		
	<i>*Projected FFB production for 14 November 2019 to 13 November 2020</i>						
1.8.4	Estimate of Certified Palm Product Claim						
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO	Palm Kernel		
				Out put (ton)	Extraction (%)	Out put (ton)	Extraction (%)
	ANIS POM	60	147,612	32,632	20	6,526	4
	<i>*Projected CPO and PK production for 14 November 2019 to 13 November 2020</i>						
1.9	Other Certifications						
	Others	-					
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
Sri Kamusan	2010	Hibumas 1, Hibumas 2, Sri Kamusan, Jebawang, Sekar Imej, Sapi Sugut	2010	Sandakan, Sabah	Certified
PT Perkebunan Milano	2009	Sei Daun, Batang Saponggol, Marbau	2009	North Sumatra	Certified
PT Mustika Sembuluh (POM 1 & POM 2)	2009	Mustika Sembuluh 1, Mustika Sembuluh 2, Mustika Sembuluh 3, KUD Bitu Maju Bersama	2010	Central Kalimantan	Certified
PT Kencana Sawit Indonesia	2010	Kencana Sawit Indonesia, Koperasi Swamata	2010	West Sumatra.	Certified
PT. Kerry Sawit Indonesia (POM 1 and POM 2)	2010	Kerry Sawit Indonesia 1, Kerry Sawit Indonesia 2, Kerry Sawit Indonesia 3	2011	Central Kalimantan	Certified
		KUD Sejahtera Bersama, KUD Kosudra, KUD Tabiku Makmur, KUD Karya Bersama	2020	Central Kalimantan	-
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
PT. AMP Plantation	2011	AMP I, AMP II, AMP III, AMP IV, Koperasi Tompek Tapian Kandis, Koperasi AWM, Koperasi Bukit Sandiang Tigo, Koperasi Mutiara Sawit Jaya	2011	West Sumatra	Certified
		KUD Dastra II, KUD Dastra 1	2019	West Sumatra	-
	2018	ANI Sambas	2018	West Kalimantan	Certified

PT. ANI (Sambas)		KUD Cempaka Biru, KUD Sentama Lestari (Plasma binaan ANI 1 Sambas)	2018	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 (POM 1 and POM 2)	2023	Sarana Titian Permata 1, Sarana Titian Permata 2, Sarana Titian Permata 3	2023	Central Kalimantan	-
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	2019	West Sumatra	-
		PHP-1 (block 22)	2020	West Sumatra	-
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	Mill stop operation
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	-
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 Landak	2020	PT ANI 2 Landak PT Pratama Procentindo	2020	West Kalimantan	-
PT. Agro Palindo Sakti 2	2020	Agro Palindo Sakti, Putra Indotropical, Daya Landak Plantation, Indoresin Putra Mandiri	2020	West Kalimantan	-

PT. Agroindo Indah Persada 2	2023	PT Agroindo Indah Persada 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	-
BBPOP (Benso Plantation)	2015	Benso, Benso Smallholder	2015	Ghana	Certified
*) 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 Out growers for Certifiable Standard				
	<p>PT. Agronusa Investama has a scheme smallholder with name of Sentama Lestari Cooperative and Sentama Lestari Cooperative. During the Initial Certification, the smallholders has been audited in accordance with the time bound plan.</p> <p>In General PT Ani Sambas was manage 4 cooperatives (Sentama Lestari Cooperative, Cempaka Biru Cooperative, Pusaka Abadi Nan Jaya Cooperative and Anugrah Semaro Cooperative). However, the scope certification is Sentama Lestari Cooperative, Cempaka Biru Cooperative and ANI Estate (OFI).</p>				

2.0 ASSESSMENT PROCESS	
2.1 Assessment Team	
RC	<p>1. Andi Pratama Pasaribu (Lead Auditor). 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, such as High Conservation Value (HCV) Training, Lead Auditor ISO 9001:2008, Lead Auditor ISO 14001:2005, auditor OHSAS etc. He has some experiences of ISPO audit in Indonesian palm oil in best management practices, land legality, environmental, social and worker welfare aspect. During this audit, he verify Legal, Partial Certification and SCCS.</p> <p>2. Satria Adi Putra (Auditor). Indonesian citizen, Diploma III majoring in Palm Oil Plantation. Have experience of work more than six years since 2009 as the operational staff of private oil palm plantations in Indonesia. Training have been followed including Occupational Health and Safety Expert (General AK3), Orang Utan and Wildlife Management, ISPO Auditor Training, RSPO Auditor Training, IHT Potential Mapping and Conflict Resolution in Production Forests, OHSAS 18001, Lead Auditor Training for ISO 9001, ISO 14001, ISO 17021, ISO 17065, ISO 19011 and ISO 22000. During this audit, he verify Best Management Practices, OHS and Long term Business Plan.</p> <p>3. Bayu Yogatama (Auditor). Bachelor of Forestry, Department of Forest Resources Conservation and Ecotourism, Bogor Agricultural University. Has attended the ISO 9001: 2015 Quality Auditor / Lead Auditor Course Quality Management System (QMS) course and ISO 19011: 2011 Guidelines for Auditing Management System, ISPO Lead Training, SA 8000, RSPO Lead Training, IHT RSPO NPP, IHT RSPO RaCP, IHT ISO 17021, and IHT ISO 17065. Having experience working in plywood field as Inspector in foreign private company. Currently working for an independent certification body. During this audit, he verify related social and worker welfare.</p> <p>4. Ebnu Kholdun (Auditor). Malaysia Citizen. Graduated with Bachelor of Civil Engineering from University Tenaga Nasional in Malaysia. He has been completed the ISO 9001: 2008 QMS, RSPO Lead Auditor, Lead assessor course for RABQSA – QM 785 (Exemplar Global) certified. He has an experience regarding the safety, health and environmental standard for construction works as an engineer for 1 year. He is fluent in local language. He has gone for various RSPO audits. Fluent in Bahasa, Malay and English. At the time of audit, has verify aspect of Transparency, Environment, HCV and GHG Emissions.</p>
2.2 Assessment Methodology, Assessment Process and Locations of Assessment	
2.2.1 Figure of person days to implement assessment	
RC	<p>Number of auditors: 4 auditors</p> <p>Number of days for RC at site: 4 days</p> <p>Number of working days for RC at site 16 Working days</p>
2.2.2 Assessment Process	
RC	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT. Agronusa Investama to the requirements of Indonesian National Interpretation of RSPO Principles and Criteria 2013 by INA-NITF, July 2016 (Endorsed by the RSPO Board of Governors meeting on 30th September 2016) and RSPO Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014 (Module E for CPO Mill).</p> <p>In General PT Ani Sambas was manage 4 cooperatives (Sentama Lestari Cooperative, Cempaka Biru Cooperative, Pusaka Abadi Nan Jaya Cooperative and Anugrah Semaro Cooperative). However, the scope certification is Sentama Lestari Cooperative, Cempaka Biru Cooperative and ANI Estate. The associate smallholders manage as full manage and the standard use is Indonesian National Interpretation of RSPO Principles and Criteria 2013 by INA-NITF, July 2016 (Endorsed by the RSPO Board of Governors meeting on 30th September 2016).</p> <p>This unit has been certified since 22 April 2013 to 21 April 2018. While PT ANI process RC, there was an announcement</p>

	<p>on 12 October 2017, the RSPO Secretariat released a statement on Hak Guna Usaha (HGU) to Indonesian stakeholders. The statement set out the requirements on legality of land, whereby an RSPO grower member's rights to land must be in the form of a legitimate HGU and Izin Usaha Perkebunan (IUP), prior to obtaining RSPO certification. So ANI cannot be conducted RC audit. After that, ANI request extension time period license for three months. On 13 July 2018 [REVISED] RSPO Updated Statement on Hak Guna Usaha - July 2018, stated for RSPO grower members that are currently RSPO certified but are yet to obtain the HGU, their certification will continue and they can proceed to recertification. Based on that announcement, the RC audit can be conducted.</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) <i>interview</i>, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site. Some opportunities for improvement of the results IC delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment.</p> <p>Improvement of findings from main assesment findings were observed by auditors at this IC assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of IC.</p> <p>The assessment program please find Appendix 2</p>
2.2.3	Location of Assessment
RC	<p>Number of units in this certification activity is 1 (one) estate and 2 (two) smallholders, which supply the raw material (FFB) to ANI palm oil mill. In conducting the assessment, the team of auditors used the $0.8\sqrt{y}$ formula to determine the management units sampling to be focused on and also considered the issues raised by stakeholder. Based on this formula, the team of auditors determined that the sampling locations are 1 palm oil mill (ANI POM), 1 estates (ANIS estate) and 2 (two) smallholders: Sentama Lestari and Cempaka Biru</p> <p>Senabah Estate and Sentama Lestari Smallholder:</p> <ul style="list-style-type: none"> • Riparian area of Sandian River, Block 206C Phase 1. Observation of HCV area such as zero chemical application policy etc. • Enclave area Block 19D. During the observation known that 6.5 Ha area are occupied by local community. • Boundary Poles ANI 094 in Block 20A. Observation of boundary pole maintenance. The poles are adjacent with cooperative's area of Anugerah Semaró'. • Riparian area of Sentakul River, Block 206C Phase 1. Observation of HCV area such as zero chemical application policy etc. • HCV Area, Block 144. Observation of HCV area that will be excluded from concession area due to land legality reason. • Boundary Poles ANI 257 in Block 144A. Observation of boundary pole maintenance. The poles are adjacent with company's new land permit. • Spraying House Observation about OHS facility, Waste Management and PPE. • Landfill Observation about waste management • Hazardous Waste Warehouse Observation about condition of temporary storage, monitoring hazardous waste, and emergency facilities. • Housing Phase 1 Observation and interview with worker related to housing facilities, such as electricity, water source, child care, school, etc. • Daycare Phase 1 Observation and Interview with worker about OHS, Salary and the other • Fertilizer Warehouse Interview with worker related to OHS, worker welfare, and emergency response • Workshop Interview with worker related to OHS, worker welfare, and emergency response • Pesticide Warehouse Observation and interview with storage operator related to chemical mixing technique, work safety in agrochemical storage. • Clinic. Observation and interview related how to handle medical waste, and clinic facilities. • Road Maintenance, Block 909D, Sentama Lestari Plasma. Observation related road maintenance. • Water Gate, Block 39, Phase 4. Observation related water management at peat soil area.

- Water Stick Level and Subsidence, Block 40, Phase 4. Field observations related to the implementation of water and soil management in peat areas.
- Subsidence Pole, Block 045B, Sentama Lestari Plasma. Field observations related to the implementation of soil management in peat areas.
- Harvesting, Block 27, Phase 3A. Observation and interviews with foremen and harvest workers related to work procedures, health insurance and labor protection, safe working practices and use of PPE.
- Spray Circle & Path, Block 35B, Phase 4. Interviews of spraying mechanism, work tools, chemicals used, doses used, medical examinations, extra fooding, PPE, labor aspect and environment.
- Replanting, Block J25, Phase 1. Interviews of replanting mechanism, work tools, PPE, labor aspect and environment.

Kumpai Estate and Cempaka Biru Smallholder:

- Occupation area in Block E051 and Block 914. Those area has been excluded from the concession map due to no agreement to release the land with land owner.
- Riparian area of Senapit River. Observation of HCV area such as zero chemical application policy etc.
- Boundary Poles ANI 285 in Block 276B Phase 6. Observation of boundary pole maintenance. The poles are adjacent with former area that released by the company due to land legality reason.
- Spraying House Phase 6 Observation about OHS facility, Waste Management and PPE.
- Daycare Phase 6 Observation and Interview with worker about OHS, Salary and the other
- Generator House 6 Observation and interview about OHS, Salary, PPE and Waste management
- Housing Phase 6 Observation and interview with worker related to housing facilities, such as electricity, water source, child care, school, etc.
- Water Pump Phase 6 Observation about sign Board, water management, and OHS
- Landfill Block 72 Phase 5 Observation about waste management
- Water pump Phase 5 Observation about sign Board, water management, and OHS
- Spraying House phase 5 Observation about OHS facility, Waste Management and PPE.
- Fire Extinguishers Warehouse Observation about fire extinguisher facility
- Fertilizer Warehouse Interview with worker related to OHS, worker welfare, and emergency response
- Generator House Phase 5 Observation and interview about OHS, Salary, PPE and Waste management
- Pesticide Warehouse Observation and interview with storage operator related to chemical mixing technique, work safety in agrochemical storage.
- Mixing Area Observation about OHS Facility, waste management.
- Workshop Interview with worker related to OHS, worker welfare, and emergency response
- Hazardous Waste Warehouse Observation about condition of temporary storage, monitoring hazardous waste, and emergency facilities.
- Housing Phase 5 Observation and interview with worker related to housing facilities, such as electricity, water source, child care, school, etc.
- EFB Application Block 264. Observation related to waste management and nutrient cycle strategy
- Harvesting. Observation and interviews with foremen and harvest workers related to work procedures, health insurance and labor protection, safe working practices and use of PPE.
- Fertilizer Application, Block 065A, Phase 5. Observation and interviews with foremen and fertilizer workers related to work procedures, health insurance and labor protection, safe working practices and use of PPE.

ANI Sambas POM:

- Security gate. Observation and interview with security officer regarding to FFB receiving procedure.
- Weight bridges. Observation and interview with weight bridge operator regarding to supply chain implementation and dispatch documentation.
- Hazardous Waste Warehouse. Observation and interviews related to waste management activities and OHS implementation.

	<ul style="list-style-type: none"> • Material Storage. Observation related to waste management activities and OHS implementation. • Chemical Storage. Observation related to waste management activities and OHS implementation. • WWTP. Observation related waste management activities, OHS Implementation. • WTP. Observation and Interview with operator about waste management, chemical handling, • Land Application Block 66 A. Observation related liquid waste management. • Workshop. Observation and interviews related to the competence of workers, implementation OHS (including medical check up), employment, waste management and complaint mechanism. • Hydrant No. 3. Observation emergency response procedure. • Grading Station. Observation and interview with grading work related to the implementation of SOP, OHS and employment. • Sterilizer Station. Observation of application and interview with sterilizer operators related to SOP, OHS and employment. • Engine Room. Observations and interviews with engine room operators on employment, occupational safety and health and defined work procedures. • Kernel Stations. Observations and interviews with kernel station operators regarding employment, occupational safety and health and defined work procedures. • Boiler Station. Observations and interviews with boiler operators regarding labor, occupational safety and health and defined work procedures. • Press Station. Observation of application and interview with sterilizer operators related to SOP, OHS, employment and wages. • Clarifier Room. Observations and interviews with clarifier room operators on employment, occupational safety and health and defined work procedures. <p>Stakeholder Consultation</p> <ul style="list-style-type: none"> • Interview with government of Sambas District consist of Labour Agency and Environment Agency. • Focus Group Discussion with head of village and communities around the company consist of Senabah Village, Beringin Village and Semanga Village (including the representation of Sentama Lestari and Cempaka Biru Smallholder) • Interview of local contractor
2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
RC	<p>Summary of stakeholder consultation process</p> <p>Consultation of stakeholders for PT Agronusa Investama was held by:</p> <ul style="list-style-type: none"> • Public Notification on 9th October 2018 PT Mutuagung Lestari Website (http://mutucertification.com/wp-content/uploads/2018/11/Notifikasi-Penilaian-Resertifikasi-1-RSPO-Agronusa-investama-POM-PT-Agronusa-Investama.pdf) • Public announcement at RSPO on RSPO Website. • Public consultation meeting with government of Sambas District conducted by visits and interview on 27th November 2018 • Public consultation meeting with internal stakeholder on 27th November 2018 • Public consultation with NGO by email conducted on 19th November 2018
2.3.2	Stakeholder contacted
	Please find appendix 1
2.4	Determining Next Assessment
	The next visit (<i>ASA 1.1</i>) will be conducted eight (8) month to twelve (12) month after date of annual license.

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Agronusa Investama POM – PT. Agronusa Investama operation consisting of one (1) mill, one (1) oil palm estate and two (2) smallholders.

During the assessment, there were two (2) Nonconformities were assigned against Major Compliance Indicator; three (3) nonconformities were assigned against Minor Compliance Indicators; and five (5) opportunities for improvement were identified.

Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5. The company has already prepared and implemented the corrective action(s) that had been reviewed and accepted by Auditor(s) in form of documentation evidence(s) e.g. (document record/photographic/etc). Those corrective action(s) taken that consist of two (2) Major non-conformities had been closed out shall be verified during certificate issued. One of Major non-conformity fulfillments almost twelve (12) months of the closing meeting, because to close the NC, certification unit need to promote the workers become permanent and these workers is under the cooperative not company. To promote the workers, cooperative need approval from their member, and this takes a long time to communicate with members of the cooperative.

MUTUAGUNG LESTARI found that Agronusa Investama POM – PT. Agronusa Investama., 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 30th September 2016) and RSPO Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014 revised on 14 June 2017 (Module E for CPO Mill).

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

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
PRINCIPLE #1 COMMITMENT TO TRANSPARENCY		
1.1	Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	
1.1.1 and 1.1.2	Sighted the evidence of list stakeholder's form Wilmar Region KALBAR entitled <i>daftar stakeholder / pemangku Kepentingan</i> latest updated for period 2018 that has been divided into internal and external stakeholders. Sighted the list had been divided into details according to the subject, contact name, address, phone number, and details related to the list. Sighted the list centralized in the office which include External Stakeholders (Provincial Government of Kalimantan Barat, Immigration Agency, Plantation Agency, Labor Agency, regent sambas district, Regent Sambas, Health Agency, Insurance, Sub District Head of Sambas and Internal Stakeholders such as head of Semanga Village, Banyan Village, Sabung Village, Sepantai Village, public figures, regional police, police station, campus and NGO, hospital, suppliers, contractors and plasma cooperatives cempaka biru, cempaka lestari and plasma sabung).	
	Sighted the stakeholders list has been updated on year 2018 and period of updating had been made yearly. SOP related to sharing and disseminate information related to external stakeholders had been clearly made (SOP 52 / WIP- KB /(02) / 0911) . The SOP had been approved by Senior Legal Department Staff and agreed by General Manager of Wilmar Group	

date commenced on 3 November 2015. Sighted the company had to respond related to complain and giving information which include 14 days from the complaint received.

Sighted the SOP of sharing information can be retrieved from PT ANI SAMBAS Head Office and the respected person which is Bina Mitra had been appointed to in charged in terms of Sharing information and handling the information that could be accesses. The socialization and refreshing course had been clearly communicated on Month September until November so the procedure related to handling the information is clearly understood.

The mill had a stakeholder list for ANI Sambas Mill for period January 2018-December 2018 that include Government of Kalimantan Barat Province, Government of Sambas District, Head Subdistrict of Sambas District, Head Village of surrounding company, public figure and village official, regional police of Sambas, sector police of Sejangkung, Sajad, Subah, police station of Semanga Village, Contractors and Suppliers. The list had been updated yearly. Sighted the appointment letter by the Human Resources to Security related to the position mentioned.

Sighted the SOP from Wilmar Group document o. SOP 60/WIP – KB/(0)/0915 dated 1st September 2015 approved by Senior Staff and agreed by General Manager. Sighted also the procedure to attend the complaint as per details:
Accepting the complaint → accuracy and efficiency on the complaint → apologizing request → credibility → attention by the company → satisfaction by company → The company had to attend the complaint in 14 days.

The company had used logbook system related to register of letter from the external parties latest respond on 2nd October 2018 from Human Resource Department of Sambas District related to socialization on working etiquette. The request form external parties on SD negeri 24 Ani Senabah year 2017/2018 had been requested by letter to PT Ani Sambas on 24th March 2018 and the amount of Rp 1,500,000.00 had been approved by Assistant General Manager of PT ANI Sambas. There is also request for national day of Indonesia at RT 07 RW 02, Semanga Village from “*Panitia Hut Kemerdekaan RI ke 73*” that include request of fund for Semanga Village from Head Ceremony with total requested Rp 16,000,000.00 and approved Rp 1,200,000.00. Sighted the logbook had been made by the unit too (*Logbook PT ANI Sambas*) regarding the letter request, incoming and outgoing for all the document.

	Status: Comply	
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1.2

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

1.2.1

PT ANI SAMBAS had also clearly explain the details and document that are legally being accessed by General Manager and publicly available in the Main Office. The public documents, such as environmental document, company annual report, general policies, licensing includes land used title and decree of land use title (HGU, HGB), operational licenses of plantation activities, environment, OHS, and social reports, organizational structure, identification risk, land use data, report of position and the amount of labor, plans for continuous improvement, OHS program, and so on. These documents are available in estate and mill office.

Company has monitoring and management report, such as employment report, business activity report of palm oil plantation industry, report of environmental management and monitoring plan, and so on. These documents also can be accessed by public through the mechanism which has determined by the company. Sighted the person in charge related to the legal document in the office and any external communication will be done by Bina Mitra and escalated to Human resource department.

	Status: Comply	
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1.3

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

Sighted the code of ethic of the company dated 15th December 2015 document number: 044/DIR – KP / XII / 2015 checked by Sustainability Div Head for the plantation and industry. Sighted the minutes related to the socialization to the workers dated 27 September 2018 at Phase 5 related to code of ethics to all workers and prepared by EHS Staff and 105 workers had attended the socialization refreshment. The socialization had been delivered to them using local language, Indonesian

Language and being socialize during muster morning. There are 3 principles on code of conduct, namely to avoid conflict of interest, to avoid misuse and/or abuse of position, and to ensure confidentiality of information and to prevent misuse of information gained through the company's operations, either for personal gain or for any purpose other than that intended by the Company. In addition to these main principles, an employee must accept individual responsibility for how own action that his conduct must measure up to the high standards of integrity and honesty expected of each employee in the company and group.

Status: Comply

PRINCIPLE #2 COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS
2.1

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

2.1.1
Land legality

Until the audit, the company does not yet land title (HGU). However, the company already has legality documents as the requirements for issuing HGUs as follows:

1. Location permit for 12,440 Ha area that issued by district head of Sambas on 30 June 2009.
2. Plantation permit dated 19 Desember 2008 for 12,500 Ha area and palm oil mill with capacity 60 ton FFB/hour.
3. The latest land map that issued by national land agency on 10 July 2018 for 8,839.4556 Ha area.

All of the document above is a requirement to obtain HGU.

Based on the results of interviews and document studies in the ANI Sambas POM, it is known that the sterilizer and welder operators do not have an Operating Permit (SIO). The company has not been able to show evidence that sterilizer and welder operators have had an Operating Permit in accordance with Permenaker 37 of 2016 (regarding pressure vessels and storage tanks) and Minister of Labor Regulation No.2 of 1982 (regarding Welding Qualifications at work). Its become non conformities No. 2018.01 with Major Indicator.

2.1.2; 2.1.3 and 2.1.4

The company has a mechanism for identifying legal regulations and evaluating compliance with legal requirements (SOP 02 / WIP-KB / (02) / 1015, Rev 02 dated October 1, 2015, which was approved by the General Manager. In this document it was explained that the person responsible for Identifying and evaluating regulations is a Legal Officer assisted by EHS officer, HRD, and Sustainability Department. The last updated of legal requirement is on 1 May 2018. Implementation of it legal requirement has been checked during the internal audit by sustainability team and other respected department (Legal Officer, OHS Officer and Human Resources Department).

The company has shown evidence of compliance with the laws and regulations as follows:

1. Plantation legality (last updated on 1 May 2018): There are 13 Laws, 10 Government Regulations, 1 Presidential Regulation, 13 Ministerial Regulations, 3 Ministerial Decrees and 1 Decree of the Director General. One of the regulations that has been implemented is Law No. 34 of 2014 concerning Plantation.
2. Environment (last updated on dated May 1, 2018): There are 13 Laws, 21 Government Regulations, 1 Presidential Regulation, 1 Presidential Decree, 35 Ministerial Regulations, 10 Ministerial Decrees, 1 Minister of Environment Decree and 5 Decrees from the Head of Bapedal.
3. Occupational health and safety (last updated on May 1 2018): There are 6 Laws, 3 Government Regulations, 1 Presidential Decree, 33 Ministerial Regulations, 11 Ministerial Decrees, 1 Director General Decree.
4. Employment (last updated on dated May 1, 2018): There are 28 Laws, 6 Government Regulations, 2 Presidential Regulations, 2 Presidential Decrees, 1 Presidential Instruction, 19 Ministerial Regulations, 12 Ministerial Decrees, 2 Decrees of the Governor of West Kalimantan.

The document is available in each unit and has been evaluated routinely.

2.1.1 Status: Non Compliance No. 2018.01 with Major Indicator

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

As written in previous criteria, until the audit the company does not yet land title (HGU). However, the company already has legality documents as the requirements for issuing HGUs as follows:

1. Location permit for 12,440 Ha area that issued by district head of Sambas on 30 June 2009.
2. Plantation permit dated 19 Desember 2008 for 12,500 Ha area and palm oil mill with capacity 60 ton FFB/hour.
3. The latest land map that issued by national land agency on 10 July 2018 for 8,839.4556 Ha area.

The plasma areas in the field was still in same area of PT ANI and was only separated by block boundaries. The legal basic for the management of Sentama Lestari and Cempaka Biru Smallholder is the Decree of the Regent of Sambas Number 194 Year 2010, on 17 June 2010, on the Appointment of Prospective and Candidates of Participants of Plantation (*Calon Petani Calon Lahan*) as Revitalization Program of Palm Oil Commodity In Semanga and Sepantai Village Sejangkung Sub District and Beringin Village- Sajad Sub District, Sambas District. These smallholder programme is full manage by management of PT ANI Sambas. Based on the explanation from representative management of PT ANI Sambas, the area and boundaries of the of the own estate of PT ANI Sambas and the plasma area will be clarified with the boundary marks when the HGU Certificate of PT ANI issued by the National Land Agency. Based on Area Statement PT ANI and Smallholder, totally is 8,391.61 Ha, the details of each area are:

- ANI Estate: 6,986.50 Ha
- Sentama Lestari Smallholder: 935.29 Ha
- Cempaka Biru Smallholder: 469.82

The company has Opportunity to ensure management of land rights (OFI).

Until this initial assessment, still no progress of the land tittle for smallholders. Legal standing for their land are only Head of Sambas District on June 2010 that stipulated the name list of smallholders.

2.2.2

According to the new land map that released by National Land Agency on July 10, 2018 it is known that there are 223 boundary poles. Some of the poles have not changed position, some have new installations and some have been marked with red painted wood stakes. According to GIS staff information and the company's management plan, all boundary poles will be completed after the committee B and after the boundary poles coordinates issued by National Land Agency.

Based on document review, The company managed area refers to map of the land area No. 23/2018 issued by Land National Agency dated 10 July 2018. Based on those map of the land area, it is indicated that there is management outside the field map but these area was cover by new location permit covering $\pm 1,024$ Ha and Production Forest area of ± 134.51 Ha. The results of field visits with management staff have shown some clear demarcation boundaries as in the form of cadastral poles and separating Production Forest areas with big trenches.

Based on evidences above, there were non-conformities identified:

1. Statement of the company's management area (hectare statement) issued officially by top management.
2. Statement of the company's attitude in relation to Production Forest areas that are no longer managed, both nucleus and plasma plantations. Non Compliance No. 2018.02

2.2.3

Based on field observation and document verification, all HGU's area that occupy by local communities has been excluded from the map of land area.

2.2.4 & 2.2.5

Based on documents verification and interviews with relevant staff (Staff of Legal Document) during ST-2, obtained the information that there were no cases of land disputes was happening with the public or other parties. From the results of a public consultation with the Head of Subang and Semanga Village, and Cooperative Management of Sentama Lestari Beringin Village and Cempaka Biru Semanga Village also known that there were no issues related to land disputes

between the PT Agronusa Investama with the parties. The company keep all evidence of the completion of recording land issues in the past. Against the land dispute cases that have occurred, provided evidence of the dispute settlement acceptable to all parties. Evidence in the form of recording of the Minutes of the Meeting and Negotiation Agreement as agreed by the parties, document of land acquisition from the previous owner who through the FPIC process. Negotiation process involving the Village Committee, head of village, landowners and management representatives by the company.

2.2.6

There was available Human Right Policy Wilmar International Limited which was published in June 2014 and endorsed by the Group and Group Head Plantation CSR Head. In the policy stated that the commitment Wilmar 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 the auspices of the Wilmar group and business unit has relationships including suppliers and contractors. Based on the results of consultation with employee representatives (Committee on Gender and Labor, Community of Beringin and Semanga Village, and related institutions in Sambas district, that 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 there is no indication of the use of military and mercenaries.

2.2.2	Status: Non Compliance No. 2018.02 with Minor Indicator
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2.3

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

2.3.1

Based on interview with community representatives of Semanga 'and Sub-village Sajingan Kecil villages and supported by the results of the HCV assessment carried out by the Malaysian Environmental Consultant (MEC), there is no customary rights in the company's concession area.

2.3.2

Based on interview with legal department staf, there is no new land acquisition process. The last acquisition has been conducted on 2008. The company has shown some compensation document on September 19, 2008 as follows:

- Compensation receipt of 1,577 Ha in Semanga Village on behalf Ahmadi.
- Compensation receipt of 816 Ha in Semanga Village on behalf Ismail Syafei.
- Compensation receipt of 236 Ha in Sepantai Village on behalf Herlin.
- Compensation receipt of 200 Ha in Beringin Village on behalf Asnadi Asmo'ie.

According to villager representative's information, compensation process involving village head, local leader, government agencies from Sub-District of Sejangkung etc.

There was also available sample of documentation of agreements that have been negotiated in accordance FPIC (*Free Prior for Informed Consent*). These documents consist of period 2008. The agreement handover of land from the previous owner has been through a process of consultation, negotiation and agreement of the parties. The negotiation process involves representatives of the company, representatives of the community (the rural landless) and Head of the village. Each compensation process accompanied by statement by the society has handed the land to the company and will not be demanded in the future.

2.3.3

The company has archived all documents related to the process of restitution of land has ever done. The document is presented in the Indonesian language that is easily understood by the parties, including the amount of compensation that is based on rules (standards) as determined by the local government (compensation for the plant or crops).

During the audit, auditor also interviewed board of cooperation who is also previous land owner and obtained information that the compensation process has been conducted by previous company (before Wilmar Group took over) and Wilmar finished the remains. All compensation process is fair and transparent.

2.3.4

In the process of negotiations and land compensation, has shown evidence form of a Statement Form and signed by the parties. For example, there was evidence of land compensation signed by the Village Head Sepantai, Sepantai Village Representative Board Member, Head of Satai Hamlet, Head of Sejangkung District and Manager of PT Agronusa Investama. The statement letter has been recorded and registered on May 1, 2009 by Notary HARDIANSYAH, SH No. 35 / LIST / V / 2009.

Status: Comply

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

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

3.1.1

The company has shown a long-term plan for the 2018-2022 period for PT Agronusa Investama (Core Area) which includes area statements, partnership management plans, seed quality, crop projections, extraction rates (CPO and PK), production costs, estimated prices, financial indicators, expansion projections and general strategies.

The company has also shown a long-term plan for a smallholder scheme that includes statement areas (mature area, immature area, land clearing, arable land, reserve area, road, drainage, housing and others).

To improve practice, the company has an Agronomy Manager in charge and responsible for conducting experiments and training on the implementation of agronomic experiments. This is based on Position Description No POD-031 / ANI-SBS / XII / 2011 dated December 1, 2011.

In addition, the company has a department, where one of its functions is to assess operational implementation in the field. If there are procedures that need to be evaluated and revised, proposals will be made to revise existing SOPs. In addition, the company already has an operational internal auditor team that acts as a supervisor for monitoring plantations and plant operations.

3.1.2

The company has carried out replanting activities, but is still focused on non-peat areas. The planned replanting of PT ANI Sambas in the mineral area is as follows:

Description	2018	2019	2020	2021	2022
Immature Area & Replanting (Ha)	1,291.60	1,512.58	1,491.10	1,287.74	825.92

The company has also shown a map of land type identification, based on these data, it is known that the company carried out replanting activities in areas that had mineral soil types. The replanting realization includes chipping activities in Block 224, with Map ID M16930 (Contract ID 036 / ANI-SPK / REPLANTING / I-2018) covering an area of 67.58 Ha.

Status: Comply

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

Operating procedures are appropriately documented and consistently implemented and monitored.

4.1.1

The company has demonstrated the standard plant and oil palm cultivation procedures contained in the 2015 Palm Oil SOP Agronomy and SOP Handbook document which has been endorsed by the Head of Plantation Group. The SOP is documented using language that is easy to understand (Indonesian). Based on field visits and interviews with spray workers in Block 035 Phase 4 Senabah Estate, it is known that workers understand the procedures related to spraying activities such as not spraying near water bodies and not spraying against the wind.

4.1.2; 4.1.3

The company has an ANI Sambas Master List SOP which contains, among other things, social field procedures, environmental procedures, OSH procedures, HR procedures, GIS procedures as well as factory and estate operating procedures.

In the Master List document there is an explanation of the several times that the SOP has been revised, for example, the SOP for Measurement of High Soil Erosion (SOP no SA 04 / WIP-KB / (0) / 2011) has been revised 1 time. In each SOP document there is also a Document Change History sheet containing the revision number, revision maker, date and description of the revision. Based on the results of the document review, it is known that all SOPs / Procedures are written in the appropriate language (Indonesian).

The company has an internal company supervision system that aims to monitor operational implementation in accordance with the SOPs owned, among others, by conducting internal RSPO audits every year, conducting internal audits of plantation and factory operations including examining aspects of procedure / SOP implementation and administration as well as conducting activities internal estate such as field trips to the estate and factory carried out by the company leadership (General Manager, Manager and Staff).

The company has shown a record of monitoring the implementation of SOP as stated in the operational audit internal report of PT ANI Sambas in 2018. The procedures for corrective actions for nonconformities that occur include Problem identification, Corrective Action, Result / Improvement, Repair Date for determining Person In Charge (PIC), determination of deadlines, as well as follow-up for resolving nonconformities.

The company has presented a list of all workers and records of participation in medical service guarantees (including contractors). Based on interviews with FFB transport contractors, it is known that the worker of contractors has provided health insurance facilities for their workers. The contractor has also shown proof of payment of health insurance to workers.

4.1.4

The company has shown the External FFB SOP (SOP 03 / SRT-ANI / (00) / 0211). The company has recorded the results of the number and origin of FFB from contractors received on a daily basis. This can be seen from the Daily Production Mill record recorded in the FFB Acceptance Form. The example of the record contains, among other things, the Police Number, Driver's Name, time of arrival of fruit, net weight and information. In addition, the company has also separated data collection regarding the origin of fruit.

Based on the results of interviews with security at ANI Sambas POM, it is known that the company has recorded properly the receipt of FFB (internal and external FFB). This can be seen in the FFB Receipt Form document (Local, Plasma and Core) which contains, among other things, Police No, Driver's Name, time of arrival of fruit, net weight and information. In addition, the company has also separated data collection regarding the origin of fruit.

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; 4.2.2

The company has shown the procedures (SOP) for oil palm cultivation contained in the 2015 agronomic and oil palm SOP guidebook document that was approved by the Head of Plantation Group. Regarding the management of soil fertility, the SOP regulates and describes the technical aspects such as the opening and preparation of land on steep, steep, coastal and lowland swamps, planting and maintenance of cover crops, maintenance and maintenance of oil palm in immature areas, mature areas and fertilization techniques and application of empty bunch mulch (EFB).

PT ANI Sambas has demonstrated a fertilization realization program. Fertilizer recordings in the Phase V Kumpai Estate in 2018 include fertilization in Block 070A Phase V using NPK Super II fertilizer on November 22, 2018 as much as 8,250 kg (2.5 kg dose). The company has shown Data on the Use of Fertilizers Per Ton FFB in 2018 for PT ANI Sambas. The data include fertilizer use per ton FFB (January period) for NPK Super K fertilizer 13-8-27 + 0.5B / 022.103,033 for 0.02 fertilizer/ton FFB.

Based on field observations in Block 065A Phase 5 of the Kumpai Division, it is known that workers understand related fertilization procedures such as not fertilizing close to water bodies and fertilizing according to the recommended dosage.

4.2.3

The company has shown that Agronomy Guide Part 3 on oil palm fertilization states that the type of fertilizer, the amount and frequency of application are made based on Agronomist recommendations by considering the results of analysis of plant tissue and nutrient status on the principal.

The company has also shown footage of soil sampling on 15-19 November 2014 with the collection of 16 samples with checks including deficiencies of N, Mg, K, B, and CuSO₄. In addition, the company (PT ANI Sambas) has shown evidence of implementation in accordance with the SOP, including the report of leaf test results with No: 45 / TANAM / V / 2018 / ANIS with the date of receipt of the sample, May 04 2018 as many as 195 samples in the plots Estate (Core and Plasma), Kumpai Estate (core and plasma). The indicators that were observed were the levels of N, P, K, Mg, Ca, B, Cu and Zn.

The company has also made visual observations also carried out when taking samples in the field listed on the Field Observation Card form. In this case visual observations are a consideration in determining fertilizer recommendations, nutrient deficiency and analyze the potential for disease attacks that are likely to become certain endemic diseases. This is in accordance with the company's procedures which state that core personnel are required to take notes during sampling about the symptoms of typical and dominant nutrient deficiencies in the Leaf Sampling Unit block such as the Hook Leaf, Frond Shortening, White Stripe and Crinkly Leaf.

Based on the results of document studies and interviews with management it is known that leaf sampling, soil and visual monitoring activities are intended to be the basis for determining future recommendations based on fertilizer requirements for each block.

4.2.4

The company carries out nutrient cycles in the form of EFB applications, fibre usage, shells and POME applications. The realization included, among other things, a blank application on July 26, 2018 in Block 979E of 4,390 kg. Based on the results of field visits in Block 264, the Kumpai Division found that the company had applied EFB at a dose of 40 tons / ha.

Status: Comply

4.3

Practices minimize and control erosion and degradation of soils.

4.3.1

The Company have Map of Soil Type for ANI Estate and Smallholders (Cempaka Biru and Sentama Lestari) that created by Param Agricultural Soil Survey Sdn. Bhd. with a scale of 1: 50,000. Based on a map, it is known that the soil types in the company is sandy soil and peat soil.

4.3.2

Based on Slope Map of PT. Ani Sambas (ANI Estate and Smallholders), slope of the land in the plantation area is dominated with flat area (0-6%) and slightly wavy (6-12%) so there is no management for an area with a certain slope. Based on the field in the ANI Estate, Sentama Lestari and Cempaka Biru, it is known that the slope of the land is dominated by flat and slightly wavy.

4.3.3

The company has shown the Road Maintenance Report document in 2018. The data includes among others as a Collection Road program using Excavators for Block 144 up to October 2018 with a length of 2,300 meters, realization in May of 600 meters, June is 500 meters long and August is 100 meters long.

Based on the results of a field visit to Sentama Lestari's 909D Plasma Block, it is known that the company has carried out road maintenance activities manually, in general the road conditions are in a damaged condition, this is caused by high rainfall during 2018. The company has the opportunity to improve road quality.

4.3.4; 4.3.6

The company has SOP on Peat management as stated in the SOP for peat land management SOP No. SA 02 / WIP-KB

/ (0) / 2010 concerning Management and Monitoring of Peat lands for Planting Palm Oil Properly. Besides that, the company had a record of peat land management for PT ANI Sambas as an effort to reduce the decline in land rates in peat areas such as selective weeding to maintain soil moisture on peat lands and monitoring the decrease in peat soil (subsidence) and groundwater level.

The company also shown a record of land subsidence by installing a subsidence pole in the PT ANI Sambas area. Monitoring is carried out every 1 year according to the company's SOP, the data is listed in the form of Annual Measurement of Peat Surface Subsides Data. Based on the results of a field visit in Sentama Lestari Block 045B Plasma, it is known that the company has installed subsidence pole which are useful as a monitoring tool for decreasing the land surface. In addition, the company has a water level monitoring document for PT ANI Sambas. Based on these data, it is known monitoring the water level in the peat area in November 2018 was in the condition of >40 cm. The related justification for this situation is the high rainfall in November 2018.

4.3.5

The company has carried out replanting activities, but is still focused on non-peat areas. The planned replanting of PT ANI Sambas in the mineral area. The company also shown a map of land type identification, based on these data, it is known that the company carried out replanting activities in areas that had mineral soil types. The replanting realization includes chipping activities in Block 224, with Map ID M16930 (Contract ID 036 / ANI-SPK / REPLANTING / I-2018) covering an area of 67.58 Ha.

Status: Comply

4.4

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

4.4.1

The company had prepared the water management plan for PT Agronusa Investama, at Senabah Hamlet, Semanga Village Sejangkung Subdistrict, Sambas District on 2016. The water source related to PT ANI Sambas are from river water from Sungai Sambas – anak Sungai Anas, and also rainwater collection sighted the water storage with capacity of 1500 Liters/tank and had been disseminated to division 1 and division 2 especially on phase 1 and phase 3A. Water treatment are also from PT Ani Sambas. The water management had been made according to the estimation usage of water such as spraying activities, fertilizing activities, activity from scheduled waste store and chemical store. Based on the water management plan sighted the water sources form 2 division as below :

- a. Kumpai Division
 - i) Sumur Bor – 17l/minutes – 40,800 l / days
 - ii) Water Pump Phase 5 – 30L / minutes – 18,000 l / days
 - iii) Water pump Phase 6 – 30 L / minutes – 18,000 l / days
 - iv) Rain harvesting – 1500l/ tank – 232,500 l / month
- b. Senabah Division
 - i) Water Pump Phase 1 – 30l/ minutes – 18,000 l / days
 - ii) Water pump phase 3A – 30 L / Minutes – 18,000 l/ days
 - iii) Water Pump Srimaram – 30 L / Minutes – 18,000l/days
 - iv) Water Pump 4 – 30 L / minutes – 18,000 l / days

The management unit had also made a calculation and details related the water usage in Division 1 Senabah which include total water usage every month = 22,375 liters and Division II Kumpai = 18,250 liters. Based on the water management plan, sighted the control system and water conservation, inspection on system distribution , leaking detection and improvement, control on water storage in landscape and estate, water usage and reused, emergency water management , drought season on water management and integrated planning

Sighted form the mill related to water result analysis for clean water dated 3rd May 2018, report number 1106/LP-BRS.PTK/V/2018 number P.1268-18 and being approved by *Kementerian Perindustrian* Republic Indonesia. Result of PT ANI Sambas are including :

Parameter test

Result analysis

Temperature	25.3
Turbidity	1.39 < 25
Total dissolved solids	169<1500
pH	6.34
Sulfat	64.5 < 500
Ferum	0.00005
Fluoride	0.0015

The company had send the sample of clean water to “Badan Penelitian dan Pengembangan Industri, laboratorium Pengujian Balai Riset dan Standardisasi Industri Pontianak”

PT ANI Sambas had already done the river water testing for Sungai Anas as per document dated 29st June 2018 no. 189/LHU/ULK/AB/VI / 2018 that include parameters such as :

- i) Total dissolved solids = 25<15000
- ii) Temperature = 26.1
- iii) Turbidity = 0.00
- iv) Color = 0.00
- v) Ammonia = 0.00
- vi) Aluminium 0.00
- vii) Ferum = 0.00
- viii) Fluorida =0.00
- ix) Sulfat =1.00
- x) Kalium Manganate = 2.8 < 10

Based on the report submitted to Health Agency, Health Laboratory and approved by Head Of Health Laboratory Kalimantan Barat. Based on the result from the water analysis, it can be concluded the water result is in accordance with the regulations as per document verification

4.4.2

Sighted the policy of Zero burning dated October 2017 SOP number SOP 17 / WIP – KB (01) / 1015 River Buffer Management (riparian belt) revised by Sustainable Officer and agreed by General Manager on 1st October 2015. Sighted also the objective on ensure the sustainability of water reservoir (River, pond and swamp area). Sighted also the sign and symbol related to procedure on marking area of boundaries such as :

1. (Marking with red color) from 20 cm of the marking.
2. The boundaries marking made by wood and diameter 10cm
3. Length of boundary marker minimum 130cm and height from the ground is 100cm.

Sighted also the clear procedure of determine the width of distance for river buffer which following the width of river as followed :

- <5m = 5m
- 5-10m = 10m
- 10-30m = 50m
- >30m = 100m.

The coordinator with GIS team had been made to ensure the location and riparian zone been marked along the river. Sighted also the procedure related to the river that has trees covered, map on scale detail of the river, on the land which had been land cleared, and SOP related to the area that had been planted. The SOP had also explain clearly the activities on the area that should be followed the regulation such as spraying, applying fertilizers and determination on environmental, health and safety procedure (including protective and preventive equipment). Based on the field observation Senabah Division and Kumpai Division, sighted a clear marking using a cylindrical pole with red marking along the river buffer. The company has the opportunity to ensure that the buffer zone is maintained (OFI)

4.4.3

Sighted the result from Bupati Sambas number 295 / PRKPLH/2018 Utilization of Palm Oil Mill Effluent from Palm Oil Industry on Land in Oil Palm Plantations. Sighted the application number 98/PT ANI – BM / XI / 2017 date 13th November 2017 related to Research Application of Land Application PT ANI SAMBAS MILL on 19th February 2018 as per details research:

- i) Block 66B = 18.79 Ha
- ii) Block 66C = 20.43 ha
- iii) Block 67 B = 5.88 Ha
- iv) Block 67 C= 7.48 Ha
- v) Block 266 A= 10.49 Ha
- vi) Block 266C = 0.45 Ha
- vii) Block 267 B = 1.12 Ha

Area of control = block 57A = 2.21 Ha and Block 978 A = 5.51 Ha

Sighted also the latest flow meter inlet on Month October 2018 8,838 m3, FFB Process 19,576,870 Kg and outlet flow meter 8154 m3 (ratio 45.25%) and FFB Process 19,576,870.00 Kg (ratio 41.65%).

The mill had monthly result submitted to Sambas and the 3 month results as followed:

Month	Parameter	Result
June	BOD 5	5.229
	COD	9.503
	PH	5.47
	Fat	15.5
	Plumbum	<0.002
	Cuprum	0.013
	Cadmium	<0.0001
	Zinc	0.007
July	BOD 5	3.917
	COD	9.229
	PH	5.40
	Fat	11.6
	Plumbum	<0.002
	Cuprum	0.015
	Cadmium	<0.001
	Zinc	0.063
August	BOD 5	1.628
	COD	6.504
	PH	6.38
	Fat	3.75
	Plumbum	<0.002
	Cuprum	0.07
	Cadmium	<0.001
	Zinc	0.104
September	BOD 5	4.569
	COD	7.93
	PH	6.67
	Fat	6.62
	Plumbum	<0.002
	Cuprum	0.059
	Cadmium	<0.001
	Zinc	0.300

The mill had submitted the report 3 months period from uli 2018 – September 2018 to “Kepala Dinas Perumahan Rakyat , Kawasan Pemukiman dan Lingkungan Hidup Daerah Provinsi Kal-Ba” no. 005/PKS-ANI / X / 2018 following the months dated below :

- i) 20th April 2018

- ii) 24th July 2018
- iii) 10th October 2018

The 3 months' report from the mill had been accepted by the "Pemerintah Provinsi Kalimantan Barat, Dinas Perumahan Rakyat Kawasan Permukiman dan Lingkungan Hidup" send by the mill. Parameter recorded and testes is in accordance with the standard and regulation used in the national level.

4.4.4

Sighted the water consumption per ton FFB for the Mill PT ANI Sambas from Month February 2018 until October 2018 as per details which include:

- i) Untreated water: Domestic POM, Domestic Estate, Dilutions, Mill Cleaning, Sub total
- ii) Treated Water: Water Treatment Plant, Boiler, Domestic POM, Domestic Estate, Dilutions, Mill Cleaning and Total m3

Month	Total water Usage (m3)
February	9166.00
March	11,127.00
April	10,835.00
May	10,537.00
June	4729.00
July	10,741.00
August	8,512.00
September	8,940.00
October	16,441.00
November	13,969.00

Water usage per ton FFB for PT ANI Sambas Mill for 2018 are :

- i) January = 10,844 = 0.73 M3/Ton FFB
- ii) February = 13,878 = 0.94 M3 / Ton FFB
- iii) March = 16,067 = 1.02 M3 / Ton FFB
- iv) April = 16,067 = 1.04 M3/ Ton FFB
- v) May = 17,467 = 1.14 M3 / Ton FFB
- vi) June = 14,204 = 1.05 M3 / ton FFB
- vii) July = 15,105 = 0.73 M3/ ton FFB
- viii) August = 21,833 = 1.21 M3 / ton FFB
- ix) September 24,973 = 1.18 M3 / ton FFB
- x) October = 27,408 = 1.21 m3 / ton FFB

Hence, sighted the average production of water / ton FFB ration not more than 1.5 M3/ ton FFB which is still under range of production and water usage.

Status: Comply

4.5

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

4.5.1

Planning for integrated pest control companies is listed in the 2015 Oil Palm SOP and Agronomy Handbook CHAPTER 8 Plant and Pest Protection (see 4.5.1) in the document governing detection & census, threshold, control by biological, chemical and manual methods.

The company has attempted to conduct biological control to suppress disease pest populations, such as planting and beneficial plant maintenance to suppress nettle caterpillar, installation of cages and monitoring of owls to suppress rat pest populations, and installation of pheromone traps in blocks with a fairly high horn beetle population. Based on observations to Block 065A Phase 5 on the Pests and Diseases Census worker, it is known that potential pests are nettle

caterpillar. In this regard, the company has conducted census and identification of the principal periodically on a monthly basis.

Based on a document review of the results of detection during semester II of 2018 at PT ANI Sambas, there was a disease population of pests above a predetermined economic threshold namely rat pests. However, based on the pesticide recapitulation it was known that the company had realized the reduction of coumatetralyl pesticides (decrease of 95.92% from the previous year).

4.5.2

Plant Pest Control training was carried out on 5-6 February 2018 which was attended by core employees, Sentama Lestari plasma and Cempaka Biru plasma which discussed detection/census of oil palm pests and diseases as well as determining the types of pests and diseases of oil palm plants with as many as 8 participants.

Status: Comply

4.6

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

4.6.1

The company has shown the 2015 agronomic and SOP guidelines for oil palm plantations stated that the monitoring and use of pesticides must meet occupational safety and health rules and refer to the OHS SOP for safe guidance on work. The use of pesticides in an effort to control the population of pests and diseases is made based on Agronomist recommendations and the results of the census are carried out periodically.

The company has made efforts to avoid the development of resistance to weeds such as the use of different types of pesticides, regulation of spray rotation and spraying in accordance with selective weeding.

The company has used pesticides that have been registered with the Ministry of Agriculture's Pesticide Commission. Based on document studies and observations in agrochemical warehouses, the pesticides used at PT ANI Sambas include Sevin 85 SP, 85% active carbaril material with registration number RI 010101197422 until 30 December 2021 to control nettle caterpillar pests (*Setora nitens*). Based on field visits and interviews with spraying workers in Block 035 Phase 4, it is known that labor has sprayed according to procedures such as not spraying near water bodies, having knowledge of the types of pesticides used, understanding the dosage used and using identify the target weeds. Based on this, it can be concluded that the company can show procedures and implementation related to security in the use of chemicals.

4.6.2

The company has shown related records on the use of pesticides, while the record contains, among other things, the plan and the area applied. The routine pesticide use program is spraying weeds in a circle and path which is carried out with rotation twice a year using Glisat (Glyphosate) and Tiara (Methyl metsulfuron).

The company has a 2018 Active Material Use Analysis Per Ha document which explains the names of pesticides, active ingredients, LD50-oral, LD50-Dermal, LD50-Inhalation, active ingredient content, Ha area, number of pesticides, amount of active ingredients and amount of active ingredients per / ha.

Based on the results of a field visit to Block 35 Phase 4, it is known that workers have understood the type of target weeds to be sprayed. In addition, workers also understand the process / workflow related to the procedures they have such as not spraying in the opposite direction of the wind.

4.6.3

The company has demonstrated the company's integrated pest control planning procedures listed in the 2015 Palm Oil Agronomy and SOP Handbook CHAPTER 8 Plant and Pest Protection (see 4.5.1) in the document governing detection & census, threshold, control by biological means, chemistry and manual. The company has also shown the Detection Program - Census of Palm Oil Pests and Diseases PT ANI Sambas documents. Based on the document, it is known that the company periodically detects disease pests every 2 months.

There is pesticide reduction. For example the use of coumatetralyl/brodifakum is 95.92% from the previous year. The company has sought biological control to suppress disease pest populations, such as planting and beneficial plant maintenance to suppress nettle caterpillar, installation of owl houses and monitoring of owls to suppress rat pest population. In addition, based on the results of field visits to Block 27, Phase 3A is known that the company has planted a beneficial plant (*Turnera subulata*).

4.6.4

The company has the 2018 Justification Agrochemical List document which contains brands of pesticides, used ingredients, WHO class / class, the nature of pesticides, forms of pesticides, targets (pests, diseases and weeds), producers and pesticide registration numbers. In addition, the company has shown the Wilmar International Plantation - West Kalimantan document dated February 17, 2016 which contains a plan to reduce the use of pesticides of types 1A and 1B according to WHO.

Based on the results of a visit to the Chemical Warehouse at PT ANI Sambas, it was found that physical verification of pesticides was in accordance with the records of the stock inventory held. In addition, no chemicals were found with paraquat active ingredients.

4.6.5; 4.6.7

The company has shown that the SOP for pesticide storage and how to work in pesticide storage SOP 14 / WIP-KB / (0) / 0610 is valid in January 2011. The SOP describes pesticide storage, pesticide mixing processes, pesticide storage rules, and procedures how to work in a pesticide storage area.

The company has conducted RSPO socialization and the use of PPE on March 21 2018 which was attended by 3B phase maintenance spraying employees with participants of 10 participants and Pesticide Application Training on February 20, 2018 which was attended by 15 participants consisting of core and plasma employees.

The mechanism of mixing pesticides in the field is as safe as giving a container/mat when pouring. Pour operators have also been equipped with PPE that are in accordance with risk identification such as masks, shoes and gloves. The company has also provided hand washing facilities such as clean water and soap. This is a method by the company to reduce the negative impact of pesticides on workers who bring food to the field.

Based on the results of a visit to the chemical warehouse, it is known that the stock of pesticides is in accordance with reality (document and inventory). There is no pesticide with the active ingredient paraquat. The company already has an PPE storage house located in the Main Estate Office Area.

Based on the results of observations and interviews on spraying activities in Block 35B, Phase 4, it is known that workers have been trained in the application of pesticides such as not being allowed to apply chemicals against wind direction, not allowed to apply chemicals in river border areas, pregnant women/ breastfeeding are not allowed to apply chemicals and workers can explain the target weeds for each pesticide. In addition, based on the results of the field observations it was known that workers had been given PPE according to hazard identification such as helmets, masks, shoes, aprons, and gloves.

Based on the results of interviews with workers and management, damaged PPE can be replaced with new ones by following the PPE replacement mechanism. The company has the opportunity to ensure the flow of knapsack washing water and rinse is collected in the space provided (OFI).

4.6.6

Procedures for managing hazardous waste are available (SOP 13 / EHS-ANI / (03) / 0117, revised 03 dated 2017 01, 2017, PP Ref. 101 of 2014. In the SOP it is explained that pesticide waste is categorized as a hazardous waste with a type of chemical expired material and chemical packaging Management of hazardous waste is stored in the hazardous waste storage warehouse, then submitted to licensed transporters and collectors before exceeding the shelf life and then recorded in the hazardous logbook.

The management of pesticides has been applied in accordance with the established hazardous waste management procedures such as used pesticide packaging from the Plant Division and found stored in hazardous waste licensed storage located in the Kumpai Division, then handed over to licensed collectors namely PT Mitra Karya Surya Kencana, after that reported to the Regional Government.

Based on the results of field visits to the Hazardous Warehouse, it is known that used pesticide packaging has been stored properly in licensed warehouses, which are equipped with hazardous waste symbols and labels. In addition, the pesticide warehouse has been equipped with exhaust fans and is arranged according to its type (liquid at the bottom and dry material at the top of the rack).

4.6.8

Based on the results of the document review, management interviews revealed that the company did not apply aerial spraying.

4.6.9

The company has conducted RSPO socialization and the use of PPE on March 21 2018 which was attended by 3B phase maintenance spraying employees with participants of 10 participants and Pesticide Application Training on February 20, 2018 which was attended by 15 participants consisting of core and plasma employees.

Based on the results of visits to pesticide storage warehouses and storage PPE warehouses, it is known that the company has provided MSDS in accordance with the products used. In addition, based on a field visit to Block 035, Phase 4, it is known that the company has provided information on handling pesticides at spraying sites such as MSDS.

The company has conducted the Pesticide Application

4.6.10

The company has procedures for managing hazardous waste procedure (SOP 13 / EHS-ANI / (03) / 0117, revision 03 dated 2017 01, 2017, PP Ref. 101 of 2014. In the SOP it is explained that pesticide waste is categorized as hazardous waste with chemical materials and chemical packaging. Management of hazardous waste is stored in a hazardous waste storage, then handed over to licensed transporters and collectors before exceeding the shelf life and then recorded in the hazardous waste logbook/balance sheet.

The company has shown the official document for submitting hazardous waste from PT ANI Sambas. The document states that on September 25, 2018, the handover of hazardous waste was carried out to the management of PT Mitra Karya with Reference No. (02/ANI-SPK/SEWA TRANS LIMBAH B3/II/2018. The types of waste handed over include contained used oil as much as 2000 liters, Filter as much as 46 kg, spill kit as much as 60 kg and contaminated packaging as much as 1 kg. Based on interviews with hazardous waste officers, it is known that the management of hazardous waste has been carried out in accordance with procedures including recording all incoming and outgoing hazardous waste (sent to licensed collectors).

4.6.11

Health check-up for the spraying team (physical examination, blood, urine, spirometry) on 26-28 February 2018 by the Manpower Transmigration and Occupational Health and Safety Service Unit. Based on the results of the examination it was found that there was 1 worker who showed a decrease in cholinesterase activity in a mild level but still below the threshold. The company follows up on this, by extra fooding when they are going to do work (morning).

4.6.12

The company has shown internal Memorandum number 058 / HRR / INT / V / 2012 dated May 31, 2012 regarding job substitution for workers of pregnant and lactating women. The contents of the policy include, "for pregnant women workers and female workers who are still breastfeeding so that they are not employed in the types of pesticide spraying jobs, fertilizing, operating transportation equipment, other jobs that have an impact on pollution / trauma for children / fetuses; female workers as referred to above are temporarily transferred to places / types of work that have no risk of the impact of pollution and collisions.

The company has shown monitoring records of pregnancy information for each female worker. Workers identified as

pregnant will be transferred to jobs that do not contain chemicals.

Based on the results of document studies and interviews with the spraying team in Block 035 Phase 4, it was found that no spraying team had been pregnant or breastfeeding during the past year. In addition, there are no incidents of nausea, vomiting and diarrhea, or indications related to skin disease or itches in the spray work.

Status: Comply

4.7

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

4.7.1

The company has shown that the Occupational Safety and Health Policy was approved by Group Plantation Head in September 2010. SOP is written in Indonesian. The results of risk analysis have covered the prevention of health and safety risks of workers in the workplace such as risk analysis including spraying, manuring, slashing, landscaping, harvesting/pruning, fruit loading, transporting and replanting.

The company shows the Department of EHS Work Program 2018 for estate and factories, which explains the provision of PPE, Health Check (once a year), inspection and inspection activities and so on. In addition, the company has shown evidence of OHS plans including First Aid Kit training on September 14, 2018 at ANI office which was attended by 24 participants and socialization of Personal Protective Equipment on April 5 2018 at ANI 2 Field and attended by 20 people participants. The implementation of the OHS program is monitored routinely, including through OHS implementation monitoring. Then the effectiveness of the implementation of the OHS program is discussed and evaluated in P2K3 meetings on a regular basis once a month.

Based on field visits and interviews with workers, it is known that the OHS program has been carried out including the provision of PPE in accordance with the level and identification of risks possessed and routine emergency response equipment inspections and health checks conducted in October 2018. In addition, workers also understand the related OHS Policy. The socialization was carried out officially and delivered through morning briefings.

4.7.2

The company identifies hazard sources and risk controls as outlined in the risk assessment analysis document dated 16 August 2018. The risk analysis covers all operational activities in the estate and factory by analyzing potential hazards, the level of risk and the control measures. For example in the harvesting activity, there is a potential for danger to be overwritten, stabbed palm oil thorns with a high level of risk and control measures such as the use of PPE, supervision, technical harvest, etc.

The company has conducted accident investigations which form the basis for further risk assessment and prevention. The accident investigation is listed in the Genesis Notification Form (FRM-EHS-051-01 Rev 01). The example of an accident investigation report Harvesters, Senabah Division had an accident hit by midrib on February 26, 2018 in block 060C.

Based on the results of interviews with spray officers, it is known that the worker has been socialized regarding OHS, but not all workers understand the OSH program carried out by the company. Regarding this, the company has an opportunity to ensure that all understands workers are related to OHS socialization (OFI).

4.7.3

The company has shown a training program included in the OHS Program. In addition to the basic OSH training provided to employees, there are special trainings given to certain employees including first aid training, hypertension training for medical personnel, training for lift and transport operators and so on.

The company has conducted a health check on February 28, 2018 which was conducted for workers in the company environment. The details of the examination included cholinesterase testing for 23 people, audiometry testing for 36 people, spirometry for 53 people and routine checks for 89 people. Based on the results of testing all workers were declared fit to work.

The company provides PPE for employees in accordance with the risk of each work with a predetermined schedule and

if the PPE is damaged it can be replaced by showing damaged evidence to the leadership. The proof of the handover of PPE included the PPE for the core spraying team (shoes, masks, aprons, gloves) to 18 people in September 2018 and the PPE of the core harvesting team (shoes) to 28 people in September 2018.

4.7.4

The company has shown the document for establishing P2K3 for the estate and mill responsible for carrying out OHS activities. The P2K3 organizational structure (for estate and plasma) is in accordance with Decree No. 690 of 2015 concerning the ratification of P2K3 on 26 June 2015 and the company showed renewal of the P2K3 organizational structure on 13 February 2017 to Labor Agency, Sambas District. Besides that, the company has P2K3 organizational structure (mill) in accordance with Decree No. 50 of 2014 concerning ratification of P2K3 dated October 24, 2014 and the company showed renewal of the P2K3 organizational structure on February 3, 2017 to Labor Agency, Sambas District.

The company shows examples of recordings or minutes of meetings at P2K3 regular meetings. Example of the minutes of the P2K3 estate meeting on 31 August 2018 in the PT ANI Sambas POM meeting room attended by secretaries and P2K3L members. Material presented regarding safety inspection and housekeeping.

Interviews with harvest workers, sterilizer operators and spraying workers at PT ANI Sambas explained that they understood the role of the P2K3 team and the P2K3 monthly routine meeting activities.

4.7.5

Companies already have SOPs on Emergency Response including Emergency Response Procedures, Procedures for Mild Fire Extinguishers, and procedure for Personal Protective Equipment, First Aid Procedures, Work Accident Reporting Procedures and Workplace Accident Investigation Procedures.

The company has an accident investigation mechanism listed in the event notification form (FRM-EHS-003 rev 02) which informs about the date of the incident, location, type of accident, employee involvement, affected body parts, missing days, type of incident / accident, chronological accident, causes and improvement plans so that they do not occur in the future.

Based on the results of interviews with workers in the estate and mill it is known that workers understand the company's emergency response procedures. Workers in the mill know the signs of an emergency in the mill and find out where the meeting points are for emergencies.

4.7.6

The company has shown a list of all workers and records of participation in medical service guarantees (including contractors). The proof of participation included the payment of Indonesian Health Insurance System (*BPJS Kesehatan*) in September 2018 to 102 monthly and operational employees of FFB with BNI virtual account code 8888890002570069 on November 13, 2018. Besides that, the company show proof of Labor Insurance (*BPJS Ketenagakerjaan*) payment in September 2018 with contribution code 181003381102 on October 15, 2018 for 111 monthly employees, operational and probation FFB operations.

Based on the results of interviews with workers spraying, harvesting and fertilizing, it is known that the company has provided insurance covering work accident insurance and pension insurance. Employees can claim medical treatment caused by a work accident to the insurance.

4.7.7

The company has shown work accidents during the period 2017 and 2018. The number of work accidents at PT ANI Sambas in 2017 is 57 cases of accidents and in the period of 2018 there were 37 cases of accidents with a decrease of 35.08%.

Status: Comply

4.8

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

4.8.1

Company has training program for workers for period of 2018 for operational training and socialization of procedure and company policy. Some of training program, namely:

- Harvesting will be held in October 2018.
- Hazardous waste management May 2018.
- Operator license will be held in May 2018.
- Emergency response will be held September 2018
- Firefighting will be held in June 2018)
- First Aid will be held in March 2018
- PPE will be held in August 2018
- SCCS will be held in September 2018

Based on interview with worker in Estate and Mill, they have received some training related to their work, such as harvesting best practice, training for manuring, slashing, and spraying, first aid training. The training has been documented into minutes of meeting, list of attendees, and photo activity. In addition to plantations and mills, the company has a training plan for 2018 for smallholders, including the use of good pesticides, harvesting procedures, OSH training and financial management training. Sample training records for smallholders such as the OHS training at Cempaka Biru Plasma conducted on July 28, 2018 attended by 50 employees including contractor employees.

4.8.2

Company has showed the documentation of training whether it is internal or external training. For example, training for fire extinguisher used which conducted on 26th July 2018, attended by 16 person. For external training, the company kept the certificate of each employee. All the training documentation is kept in worker personal file. Based on the results of interviews with contractor workers explained by employees that the company has conducted several types of training, including training on the use of PPE in factories, emergency response simulations, and for smallholders, the example of training that has been conducted is training in the use of pesticides and harvesting procedures. Sample training records for contractors such as the emergency response simulation training at ANI POM conducted on November 23, 2018 attended by 38 employees including contractor employees

Status: Comply

PRINCIPLE #5 Environmental responsibility and conservation of natural resources and biodiversity
5.1

Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continuous improvement.

5.1.1 and 5.1.2

The company had provide an EIA report AMDAL for mill and estate as per details :

- i) *Laporan Usaha Pengelolaan Lingkungan Hidup (UKL) and Usaha Pengelolaan Lingkungan (UPL)*
- ii) The company had send the report to *Dinas Perumahan Rakyat Kawasan Pemukiman dan Lingkungan Hidup Pemerintah Kabupaten Sambas* and being approved as followed :
 - *Bupati Kabupaten Sambas – 003/PKS-ANI/IV/2018*
 - *Kepala Dinas, Perumahan Rakyat, Kawasan Pemukiman dan Lingkungan Hidup Kabupaten SAMPAS – 004/PKS-ANI/IV/2018*
 - *Kepala Dinas Pertanian dan Ketahanan Pangan Kabupaten Sambas – 005/PKS -ANI /IV/2018*
 - *Kepala Badan Penanaman Modal dan Pelayanan Perizaiin Terpadu Kabupaten Sambas – 006/PKS -ANI /IV/2018*
 - *Kepala Dinas Kesehatan Kabupaten Sambas – 007 /PKS – ANI /IV/2018*
 - *Kepala Dinas Tenaga Kerja dan Transmigrasi Kabupaten Sambas*
 - *Kepala Dinas Perkebunan Provinsi Kalimantan Barat – 009/PKS-ANI/IV/2018*
 - *Kepala Dinas Perumahan Rakyat Kawasan Pemukiman dan Lingkungan Hidup Daerah Provinsi Kalimantan Barat – 010/PKS – ANI /IV/2018*

- Kepala Dinas Tenaga kerja dan Transmigrasi Provinsi Kalimantan Barat – 011/PKS -ANI / IVI 2018

The Company has a document on Environment Impact Assessment (EIA) approved by the EIA Commission, on behalf of Minister of Forestry No. 635 / Menhut-II / 2001 dated May 1/2001 (EIA area of 15,000 ha and Mill Capacity 60 tonsFFB / Hour).

Sighted the report had been send by EHS Officer :

Sighted also the report for the estate "*Rencana Pengelolaan Lingkungan Hidup (RKL) and Rencana Pemantauan Lingkungan Hidup (RPL)*" that include details of company, name, address, phone number , *status permodalan, bidang usaha atau kegiatan, Ijin Mendirikan Bangunan, surat ijin usaha perkebunan, izin Lokasi , SK Amdal yang disetujui*. The location was in Semanga Village, Senabah Hamlet, Sejangkung Subdistrict, Sambas District including the GPS Point coordinate. The 1st Semester for the year 2018 had include the revision of Document such as *Pemantauan Lingkungan Hidup* :

- Monitoring on erosion control
- Monitoring on reduce quality of water surface
- Monitoring on potential fire occurrence
- Monitoring on vegetation and fauna
- Monitoring on working opportunities
- Monitoring on legal compliance
- Monitoring on Safety of the local people.

The report had been also record the water result analysis for the mill and estate as per update on mill.

5.1.3

The Company has conducted environmental monitoring in accordance with the *Matrix of RPL* period July to December 2016, for example: waste water quality test, water quality test, observation of endangered species, monitoring of local labor and so on. Implementation report of RKL/RPL are then reported to the local government. The monitoring on *Environment Management* had been 6 monthly reviewed and the report had been submitted to Sambas Agency. The monitoring procedure had been done as followed:

- For the types of impacts of erosion rates, the forms of monitoring that have been carried out include: measuring soil erosion.
- For the type of water quality impact, the forms of monitoring that have been carried out include: measurement of discharge and quality of wastewater before and after WWTP, measurement and analysis of the quality of water bodies.
- For the types of impacts of the disruption of flora and fauna, the forms of monitoring carried out include direct observation of the diversity of flora and fauna.
- For the type of impact of employment opportunities, the forms of monitoring carried out include interviews with village communities regarding the number of workers absorbed.
- For the types of environmental health impacts of the community, the forms of monitoring carried out included interviews with village communities.

Status: Comply

5.2

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

5.2.1

The Company through cooperation with MEC Malaysia has identified High Conservation Value (HCV) Assessment, March 2011 with a total area of 453.45 hectares. Based on new kadastral area in July 2018, known HCV area is 61.81 hectares (4.83 ha on planted area and 56.98 ha on HCV area). List of flora and fauna have been described in the document HCV.

The company also has identified species of flora and fauna in PT Ani Sambas in March 2014 by the Wilmar. There is one bird species status Least Concern by the IUCN, 2 bird species under CITES Appendix II status, and 12 species of birds protected status under PP 7/1999. There are 8 types of mammals status Least Concern by the IUCN, two types of status Vulnerable by the IUCN, 4 types of status Appendix II under CITES, and 2 species of protected status by the PP. No.

7/1999. There are 7 types Amphibian and Reptile status Least Concern by the IUCN, 3 types of status under CITES Appendix II, and there are no protected species under PP 7/1999.

5.2.2

The company has conducted protection of HCV & Species RTE in accordance with procedures, such as socialization to employees and the surrounding village communities; installation boundary markers of chemical application on riparian; HCV signboard installation and planting trees on the riparian (*Based on field observation in Sentakul riparian, Sandian riparian 206C, and HCV area in Block 144 Sabung Village*).

The Company has conducted monitoring of HCV and RTE species once six months, the last monitoring was done on January 20 2018 by HCV Officer and Tim. Based on monitoring results cannot be found to capture the activity, preserve or killing animals. Recommendations of the results of monitoring same have been implemented by the company, for example planting trees and installing boundary markers chemical applications. One of the activities carried out to increase biodiversity is planting trees in HCV areas and river borders and monitoring woody plants that have been planted. Based on document review and filed observation known that CH has conducted HCV management in accordance with its management plan.

5.2.3

The Company has conducted socialization HCV and RTE species to the workers and the surrounding villages for example:

- OHS, RSPO and HCV socialization and training on 28 July 2018 at Plasma Cempaka Biru on 28 July 2018 attended by 50 participants.
- Information on HCV riparian, Protected Flora Fauna in the Block 065 area on October 3, 2018 was attended by 42 participants.
- Socialization of HCV riparian, Protected Fauna Flora and Women's Committee in the Block 930 D area on June 18, 2018 was attended by 38 participants.
- The socialization of HCV riparian, Protected Fauna Flora, PPE and Women's Committee in the Phase 1 MR2 area on April 9, 2018 was attended by 11 participants.

5.2.4

Monitoring HCV and RTE species carried out once every 6 months, the last monitoring was done on January 20/2018 by HCV Officer and Team. Implementation and monitoring of HCV and species RTE are based on previous monitoring. the management plant that has been made has been effective, however the company continues to conduct an annual evaluation of the implementation of HCV management and monitoring that has been carried out.

The results of the 2017 evaluation are to multiply tree planting in HCV areas, this can be seen during 2018 the company followed up on the evaluation results by planting trees in several HCV areas. Some of the recommendations from the monitoring results have been carried out by the company such as planting trees and installing chemical application boundaries, while the evaluation for 2018 and recommendations for the next year is monitoring the maintenance of trees that have been planted.

5.2.5

Based on documents study and interviews with local communities obtained the information that there are no local public lands within the boundaries of the company's operations.

Status: Comply

5.3

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

5.3.1

Sighted the list of waste made by the estate PT ANI Sambas for hazardous waste and normal waste as per details :

a) Engine Room :

- Diesel usage – Scheduled waste
- Spent container – Scheduled waste
- Rags – scheduled waste

- Used gloves – Scheduled waste
- Neon lamp – Scheduled waste
- Oil Filter – Scheduled waste
- Spent container – Scheduled waste
- b) Workshop
 - Spent rags
 - Spent gloves
 - Spent containers
 - Spent oil
 - Ex paint containers
- c) Housing Area
 - Spent paint
 - Organic waste
 - Inorganic waste
- d) Office and School
 - Organic waste
 - Inorganic waste
 - Cartridge and spent tuner

Based on the list sighted also the table had collected the station area, classification, category, implemented, monitoring, location of waste process, and responsible person. Sighted the sources of waste for all the category as being categorized into different area.

Sighted the list identification for waste activity at PT ANI Sambas (Fulfillment Article 6 PP85 year 1999)

Activity	Non Hazardous Waste	Hazardous Waste
Herbicide Spraying	-	<ul style="list-style-type: none"> • Chemical waste spillage • Waste water spent container for spraying and PPE • Ex spent container spraying
Fertilizer application	Spent fertilizer rags Frond chips	
Replanting activities		Lubricant Spillage Chemical Spillage Spent Container Waste
Operation and Genset Maintenance		Spent Filter Spent Filter Container Spent Waste Oil from Oil trap Spent Waste Oil Spent rags Spent Spill kit container Grease Container Spent Battery Spent Seal and container waste
Transportation and chemical usage as fertilizer in the area of production	Fertilizer waste	Chemical spillage
Transportation, receiving and safekeeping of diesel.		Diesel Spillage Petrol Spent Spillage Spent Drum Oil Spent waste container Spent spill kit Spent used rags

Maintenance of vehicles and equipment Vehicle maintenance and upkeeping	Spent tires Spent sparepart tires Plastic and papers	Spent oil Spent battery Spent waste fuel Spent waste container Spent gloves Spent rags
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5.3.2

Based on the “*Izin pengelolaan Limbah Bahan Berbahaya dan Beracun*” for the safekeeping activities in location PT ANI Sambas Estate, it was sighted that Bupati Sambas had allowed the PT Agronusa Investama Sambas related to Palm oil planting at location Semanga Village, Sejangkung Subdistrict, Sambas District, Kalimantan Barat Province which located :

- i) Hazardous Waste Storage Solid at Kumpai
- ii) Hazardous Waste Storage Liquid at Kumpai
- iii) Hazardous Waste Storage Senabah

That the location must follow the regulation that has been permitted by the *Sambas Regent* such as :

- *Perform the identification of hazardous waste produced*
- *To record the name and quantity of hazardous waste generated*
- *To perform hazardous waste storage in accordance with the prosecution of applicable legislation and regulations*
- *Do the utilization of waste hazardous waste treatment hazardous and landfill hazardous waste self-carried or handed to the collection of hazardous waste, utilization of hazardous waste, hazardous waste processors and hazardous waste that had complete licensing*
- *Compile and deliver hazardous waste storage reports.* Sighted the permit had been commenced since the date of approval 2nd April 2018 by *Sambas Regent* and permitted for period of 5 years.

Sighted the permit had been commenced since the date of approval 2nd April 2018 by *Sambas Regent* and permitted for period of 5 years.

Based on the document verification sighted the “*Berita Acara*” for submission of scheduled waste PT ANI Sambas as per details :

- i) Reference number : 02/ANI – SPK / SEWA TRANS LIMBAH B3 / II / 2018 dated 25th September 2018 at Hazardous Temporary Storage ANI Sambas Division 1 which submission of
 - Spent Container oil (1300 liters) Filters (5Kg) Spill kit (30 Kg) Rags (5kg) contaminated container (11kgs)
 - Details of truck : KB 9611 SA for PT MITRA KARYA and approved by The estate manager
 - 26 September 2018 PT Ani Sambas : number 061 /MKSK/BAP-LB3/IX/2018 : Spent lubricant container, 2.97 Tonne, Spent Filter (0.0912MT) used rags (0.095 MT) Spent Container (0.7788 MT)
 - Sighted the manifest for document Hazardous waste from PT MITRA SURYA 0001593, 0001594, 0001595, 0001596 dated 26 September 2018
- ii) “*Berita acara penyerahan Limbah Bahan Berbahaya dan Beracun*” dated 25th September 2018 from Hazardous Waste Storage Mill-PT Agronusa Investama (ANI) Kumpai – Sambas to PT MITRA KARYA SURYA KENCANA
 - Spent Lubricant (0.545 MT) used Rags (0.002 MT) spent rags (0.0001MT) spent filter (0.036MT) spent contaminated Hazardous Waste (0.391 MT) Accumulate spent (0.005 MT) lamp TL(0.0024MT)
 - Sighted the manifest number 0001587, 0001588, 0001589, 0001590, 0001591, 0001592
 - Details : Truck, Capacity 8 Ton , route to Pontianak – PT Mitra Karya Surya Kencana, (manager) submission to Manager of (EHS PKS PT ANI Sambas)

The company had also prepared the agreement between PT ANI SAMBAS and “*Rumah Sakit Umum Daerah Sambas, Kabupaten Sambas*” number: 026/ANI-SMBS/X/2018 and Number 060/1851/RS-SBS/X/18. Sighted the agreement between manager of (PT ANI SAMBAS) and the doctor of, Directory *Rumah Sakit Umum Daerah Sambas Kabupaten Sambas* and clearly mentioned as the second party should counted the medical waste from the first party and dispose it

as per regulation and the agreement dated from 2nd October 2018 until 2nd October 2019. The agreement dated commenced on 2nd October 2018.

The company had also made a form "*Neraca Limbah Bahan Berbahaya dan Beracun*" *Limbah B3* that being documented in 3 months dated 28th November 2018 which comprise :

- i) Type of Hazardous Waste waste = (spent lubricant , Filter, Spent Battery, spent spill kit, spent rags)
- ii) Date of entry Hazardous Waste waste
- iii) Source of waste B3 – Genset, Water pump, vehicle operational
- iv) Total previous month – 198, 24, 27, 2
- v) Total Maximum S/D
- vi) Date of waste out
- vii) Total waste hazardous waste
- viii) Document Evidence
- ix) Total Balance in temporary storage

The three months report for the PT Agronusa Investama – Sambas Number : 026/ EHS-ANIS/X/2018 from months July – September 2018 and the report being approved by Lead of PT ANI and send to the Lead of Sambas Regency

Sighted the "*Berita Acara penyerahan dan penanganan limbah Klinik*" PT ANI Sambas dated 26th November 2018 to *Rumah Sakit Umum Daerah Sambas*, medical activity at PT Agronusa Investama Sambas amounted 48.8 Kg send by PT ANI SAMPAS to the manager and approved by *Dinas Kesehatan Kabupaten Sambas*

5.3.3

Sighted the waste management for estate PT ANI Sambas for latest Month October 2018 and being divided into weeks as followed :

Date	Area	Organic waste – (KG)	Inorganic waste (KG)
1-6 October 2018	Office	3	4
	Housing area	1668	1800
	Schools	5	6
	Store	2.5	5
	Guest House	1.5	3.7
8-13 October 2018	Office	3	3
	Housing area	2100	20000
	Schools	3.3	4
	Store	2.7	4.7
	Guest House	3	3.5
15-20 October 2018	Office	3	5
	Housing area	1800	1100
	Schools	4	6
	Store	2.7	4
	Guest House	3	3
22-27 October 2018	Office	3	5
	Housing area	1600	2300
	Schools	4.2	5.5
	Store	2.5	4.7
	Guest House	1.5	4.5
29 October – 03 November 2018	Office	3	4
	Housing area	1600	1800
	Schools	4.2	6
	Store	2.5	5
	Guest House	1.5	3.7

The company had made an SOP related to waste management on housing area and approved by General manager document no. (SOP 13/WIP-KB(0) / 0610) dated January 2011 and being responsible to Group Manager . Sighted also a clear guideline on SOP that will directly to office, permanent housing , *tempat pembuangan sementara* (TPS), waste segregation area, final waste disposal (TPSA) from the river (=200 meters, distance of temporary storage from housing minimum of 300 meters).

However according to law (PP No. 81 tahun 2012 Pasal 23 (3)) it should be more than 1 Km form the neareast housing area, i.e. *The distance from the settlement is the distance of the landfill site from the settlement of more than 1 KM taking into account leachate pollution, odor, the spread of disease vectors.*

Waste management related to mill Solid Decanter Cake Number SOP 25/ EHS -ANI / (00) / 0113, Solid decanter :

- i) Solid decanter collected solid bin through Solid Decanter Conveyor
- ii) Solid Decanter been in place to the dump truck and hence eing transported to the collection area that has been designated inside the estate.

However during the audit sighted the solids had been place in the area not according to the procedure. **Non Compliance No. 2018.03 with Minor Indicator**

5.3.3 Status: Non Compliance No. 2018.03 with Minor Indicator

5.4

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

5.4.1

Sighted from the document for Mill PT ANI Sambas "monitoring penggunaan sumber bahan bakar' PKS PT Agronusa Investama year 2017 from month January – December 2017 :

Month	Total usage of Shell (Kg)	Total usage of fiber (Kg)
January	787,644	1,758,365.00
February	172,971	
March	790,994	
April	678,229	
May	827,886	
June	627,245	
July	1063,304	
August	1,005,090	
September	1,042,077	
October	1,197,270	

Usage of ratio shell and fiber had been recorded latest on month of August 2018 for the mill that calculate the details as followed in Kg :

- i) Total FFB produced = 14,653,041.00
- ii) Total shell produced = 293,060.00
- iii) Total fiber produced = 1,758,365.00
- iv) Total solid produced = 512,856.00
- v) Total empty fruit bunch = 3,223,669.00
- vi) Total boiler usage = 2,784,078.00
- vii) Fiber to boiler = 1,758,365.00
- viii) Shell to boiler = 293,060
- ix) Diesel to genset = 10,105
- x) OER = 18.77
- xi) CPO Produced = 2,858,830.00
- xii) % Fiber = 20%
- xiii) % Shell = 3 %
- xiv) % Diesel = 7%

- xv) Fiber to CPO = 2,352,241
- xvi) Shell to CPO = 392,039.00
- xvii) Diesel to CPO = 8,268.00

Sighted the SOP related to the mill on "*Pemanfaatan Limbah Padat*" dated 2nd January 2013 Document approved by Mill Manager and prepared by safety and health of the mill.

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

PT ANI SAMBAS had implemented the replanting techniques for Senabah Division, at Block 006, Block 007, Block 023 and Block 024 at 1st Division Senabah. Sighted the contract between PT Agronusa Investama Sambas with CV. Kereta Sakti Kencana related to replanting and the details on the activities that should be done on replanting such as specification and volume as per details :

- Replanting Palm Oil – Normal
- Replanting palm Oil – dead palm
- Replanting Palm Oil – Small Palm Oil
- Remove the palm frond and enclosed
- Drainage 1X1 m
- Drainage service 1 X 1 X 1 m
- Drainage Service 2 X 2 X 2 m
- Volume 352.99 ha (Block 6, 07, 23 and 24)
- Location Map of the area.

Sighted the total area of 352.99 ha had been marked for replanting and the works still on progress by the division. Based on the contract sighted and field verification, there is no burning method applied by the division to continue replanting activities. Method of replanting by the company including the limit of work, chipping on palm oil , Stump felling work, stacking and lining works, lane work, drainage preparation, e.g ; 1meter from field drain and 2 meter from main road. The contract had clearly written on the agreement related to "Zero Burning Method" which explain: Strictly Prohibited from burning on carrying to work related out replanting. The second party should report to the first party related to burning area in replanting area and the firefighting work should be directly implemented and report should be made.

The company had made SOP related to no open burning and had been disseminated to all the units plantation dated 5th December 2018 which mention no open burning related to open the new area or replanting or other development that had been written clearly in the policy "*Kebijakan Pengelolaan Lingkungan*" clause no. 4: implementing the zero burning policy on the land and estate expansion including replanting.

5.5.2

Sighted no open burning method use for replanting method on division 01 Senabah, as per area 352.99 ha. According to the SOP by Wilmar Group, sighted the clause on explaining Zero Burning principle on the estate expansion, and SOP Policy in Wilmar, No Deforestation, No Burning and No Exploitation to the people had been Circulated since 5th December 2013 situated at Tompek Tapani Kandih Agam, Sumatera Barat on 1st February 2014. Sighted the evidence related to report on Monday 7th may 2018 and the material Socialization including the OHS, RSPO, HCV, and prepared by the management, attended by 50 peoples related to harvesting workers. Sighted the minutes that include:

- a) Important of PPE to be used
- b) Environmental and safety should be available during the works
- c) RSPO Element including the zero burning policy of the company being socialized.

The company had also installed the signboard inside the mill and surrounding the estate related to no Burning procedure of Wilmar Group.

Status: Comply

5.6

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

5.6.1 & 5.6.2

The Company has recorded all the activities of pollution and GHG emissions. Sources of pollution and emissions of activities such as fertilizers activities, pesticides activities, transportation activities, generator activities, boiler activities, and waste water treatment activities.

The Company has implemented GHG mitigation in accordance with the plan, among other things: no land clearing after 2005, fertilizers use in accordance with the recommendation of leaves and soil analysis, applying the concept of IPM, repair the machine regularly, utilization of renewable energy and air quality test regularly, waste water treatment on the WWTP and waste water treatment plants test regularly. the company has conducted noise level testing in semester 2 of 2018, for example the noise in the sorting area is 67 dB, in front of the office is 66 dB, in the 88 dB machine house. 80dB boiler, and 84 dB sterilization For areas with noise above 80 dB the company has provided earplugs / earmuffs to avoid hearing loss due to noise.

5.6.3

The Company has conducted smoke emissions test including noise level in the Boiler and Generator Mill period from July to December 2018, which is performed at an accredited institutions (Health Laboratory, Kalimantan Barat Province). The test results are in accordance with national regulation. The test results periodically sent to the local government. Ani Sambas POM and estate has calculated GHG emissions period 2017 using the RSPO PalmGHG calculator Version 3.0.1.

Emission per product	tCO ₂ e/tProduct
CPO	6.47
PK	6.47

Production	t/yr
FFB processed	146455.46
CPO produced	28855.391

Extraction	%
OER	19.7
KER	4.58

Land use	Ha
OP planted area	10231.66
OP planted on peat	3665.2655
Conservation (forested)	52.75
Conservation (non-forested)	

Summary of field emission and Sinks

Emissions	Own crop		Group		3 rd party	
	tCO ₂ e	tCO ₂ e/tFFB	tCO ₂ e	tCO ₂ e/tFFB	tCO ₂ e	tCO ₂ e/tFFB
Land conversion	56391.86	0.44	13659.19	1.06	0	0
CO ₂ emissions from fertilizer	5215.57	0.04	464.32	0.07	0	0
NO ₂ emissions	20455.56	0.16	8872.67	0.42	0	0
Fuel consumption	1208.16	0.01	13.28	0.01	0	0
Peat oxidation	112329.38	0.89	62205.1	2.7	0	0
Sinks						0

Crop sequestration	-63443.92	-0.5	-17463.89	-0.94	0	0
	0	0	0	0	0	0
Sequestration in Conservation area	132156.61	1.04	67750.67	3.32	2826.38	0
Total	56391.86	0.44	13659.19	1.06	0	0

Palm GHG Calculation Options Using Apply November 2005 Cut of for LUC

CH has conducted GHG emission calculations period 2018 Using Calculator Palm GHG version 3.0.1. Accurate data has been put into the RSPO PalmGHG Calculator (Palm GHG version 3.0.1) and has been verified. Summary of net GHG emissions from PalmGHG calculator of the audit report which calculation option is applied Apply November 2005 Cut of for LUC.

Status: Comply

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

6.1

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

6.1.1

The company has document of Social Impact Assessment Report for scope of Plantations & Palm Oil Mill. The assessment process carried out in March 2011 by the Indonesian Resource Institute. The document describes the social impact management of estates and factories, among others: employment, health and safety, facilities and benefits of workers, consultancy and communication, stability of employment, business opportunities, revenues, income household, institutional, Perception at the company, socio-cultural changes, health workers and the public, and tenure. The process of data collection is done through discussions with the parties, the employee and community. The results of these discussions are described in the form of Minutes of the results of the discussion. Evidence in the form of recordings Participant List Discussions at the time of collection of information. The parties that are involved, among others, employees and the communities surrounding villages (Semanga, Beringin and Sepantai) was attached to the report. In September 2018 Review of Monitoring Plan Social impact PT Agronusa Investama was conducted. These document was contains descriptions among others; Sources of impact, parameters measured, Monitoring Objectives, Methods Data collection and analysis, monitoring locations, the Executive and the results of the review.

Based on interview with the villagers, There is no issue related to the negative impact on the environment caused by the management of estate and mill in PT. Agronusa Investama. Also there is no conflict in the land management that occurs between the communities with the company. Based on the results of interviews with the villagers of Semanga Village and Sajingan Kecil Village, it was found that there was no significant issue, the issues that emerged had been covered in the SIA documents.

6.1.2

There was shown an evidence of record meeting with the parties during the discussion (consultation), in the form of Key Issues List (Results Stakeholder Consultation with Employees of the Company and the Public Interest). Recording summarizing the results of discussions during the field data collection

6.1.3

It has been shown recorded evidence include:

- Documents Report of RKL / RPL Semester 2 year of 2018. In the document has been explained about the social impacts are monitored and managed, among others: community fidgetiness & Employment.
- Summary of the implementation of the collection of information for planning and managing social impact monitoring.
- The presence or absence of the parties, consist of; representatives of the local community, the village government and community leaders

6.1.4

It has been shown evidence of record, consist of:

- Document Review of Plan for Monitoring the Social Impact of PT Agronusa Investama year of 2018, contains a description of; Sources of impact, parameters measured, Objective Monitoring, Data Collection and Analysis Methods, Location Monitoring, Implementation and results of the review
- Minutes of the implementation of the FGD among employees of PT ANI Sambas with stakeholders (community and around the Village Government), dated 28 September to 3 October, 2018), participatory discussion regarding the impact of Social Monitoring Plan Review of PT Agronusa Investama year of 2018.
- Attendance List of Participants
- Photographs of Focus Group Discussion process

6.1.5

The Company has conducted several activities for farmers, among others; guidance to the farmers in the management of oil palm plantations and management of cooperatives.

Status: Comply

6.2

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

6.2.1

Sighted the SOP had been updated on 3rd November 2015 document no. SOP 52/WIP-KB(02)/0911, giving information to the external parties, transparency made and agreed by General Manager. The communication related to respond will be attended by the management on 14 days once the complaint had been made. Based on the SOP sighted the details related to the objective of the SOP such as :

- a. To Identify related to information public to be prepared
- b. The related parties that involved into completion of information
- c. Communication related to the information that has been prepared
- d. The parties that released the approval and open access to the information mentioned.

The company had also defined the clear objective which the information can be continued into the legal department as soon as possible such as :

- External – if involved the project CSR outside Kalimantan Barat, then the request should be passed in the CSR office in Singapore
- Domestic – if inside the region KALBAR, the legal team after consultation with GM will be responsible to accept, arrange and continue the information to the related department
- The company will be responding the request related 14 days maximum.

The company had also the SOP related to the information and the request can be accepted through various channel such as Liaison Office, telephone, fax, email and letters. Details related to request are also being clearly mentioned such as name, organization, and address.

ANI Sambas POM

Sighted the communication and consultation procedure related to the complaint and grievances by the community. The document (SOP 08 / ADM –ANI (00) 0613 rev 00) had been Circulated to all the workers and socialized. The commenced date is from 29 June 2013 and approved by Mill Head. A clear procedure had been mapped out by the mill as per details :

- i) Communication and consultation is carried out by PIC handling complaints, information and communication externally
- ii) Conduct an analysis of the follow-up, responses to complaints or community demands that require immediate discussion
- iii) PGA marks the issue in the log book
- iv) Establishing company policies that will be taken in eliminating the mentioned matters related to company regulations
- v) Conduct coordination with the community to create a meeting schedule in order to open lines of communication and consultancy in a timely manner.

- vi) Accept company policy to the community and conduct joint discussions to safeguard the interests of both parties
- vii) Analyze and make conclusions on the discussion material together with the community and then convey it to the management of the company
- viii) Conduct socialization of certain steps to follow up on the results of sharing with the community
- ix) Establish the type of document that is publicly accessible
- x) If the PIC has to communicate, there is an obstacle at the time of communication implementation, then it is immediately replaced with another staff first and asks for an explanation of the external Communication P

6.2.2

Based on the documentation given sighted the document form PT ANI Sambas dated 1st December 2011 document number POD – 012 / ANI – SBS / XII/2011 and being appointed to BINA MITRA that responsible to:

- i) Implement a good data archive.
- ii) Implement a proper procedure (SOP)
- iii) Build a good relation with the people surrounding the estate and related parties

The main task as followed fostering good relations with the community around the plantation and related institutions, coordinating and communicating with the village head, religious leaders and youth as well as related parties on the problems that occur around the plantation and finding appropriate solutions to problems. Sighted the appointed party had been made by HRD Manager and approved by General Manager.

6.2.3

The company had made a stakeholder list comprising PT ANI Sambas for Division 1 Kumpai and Division 2 Senabah that listed down all the affected parties related to plantations for period of January 2018-December 2018 such as: Provincial Government of Kalimantan Barat, Immigration Agency, Plantation Agency, Labor Agency, regent sambas district, Regent Sambas, Health Agency, Insurance, Sub District Head of Sambas and Internal Stakeholders such as head of Semanga Village, Banyan Village, Sabung Village, Sepantai Village, public figures, regional police, police station, campus and NGO, hospital, suppliers, contractors and plasma cooperatives cempaka biru, cempaka lestari and plasma sabung. The list had been approved by Personal and General Affairs. The list had been updated yearly. Sighted the appointment letter by the HR Manager to division Janru Security related to the estate.

The company had an SOP related to "Procedures of complaints management/handlers and/or complaints" that had been approved by (Sr Bina Mitra Staff) and agreed by (General Manager) of Wilmar SOP 60/WIP-KB/(0)/0915 clause 12 "Stages/procedures for management/complaint handling and/or complaint ordinance:

Point 12 (b): Receive, record and classify material complaints or complaints received (there) include:

2) Recording of complaints ▯ every incoming complaint must be recorded in the complaint form provided in each Work Unit / Operational Unit / Company Business Unit.

3) Any complaints or complaints that have been received and recorded in the form of complaints / complaints that are recorded in the complaint register appendix (Appendix 1) and which are recorded in the Complaints Register Book. Attachment 2 must contain information about:

- Sequential number of complaints
- Date of receipt of complaint
- Name of the reporter who submitted the complaint
- Name of agency officials reported
- Name of staff receiving complaints
- Programs / activities that are complained of
- Material
- Location
- Time of incident
- Source of report

The company had prepared a form related to "The Minutes of Grievance and Employee Complaints ' FRM 01/SOP 42/HRD/(0) /06.09 dated June 2009 that include all the details mention above.

The company had made a socialization to the workers regarding Socialization, the procedure of delivery of the employee dated 4th September 2018 on Tuesday by Division office that being attended by Manager, Field Officer, Field Conductor ,

environmental health and safety, and workers representative from all person general Affairs. Sighted the minutes that details “*karyawan ingin menyampaikan keluhan kepada perusahaan maka dapat disampaikan melalui kotak saran yang dipasang di depan kantor*”. However, based on the field observation and document verification, sighted no logbook or completed complain form being written and recorded by the management unit as the procedure stated the, any complain should be written by the management unit and record kept in a registry form as per mentioned. **Non Compliance No. 2018.04 with minor category.**

6.2.3	Status: Non Compliance No. 2018.04 with minor category
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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 company has procedure to handling of Grievance/Complaint (SOP 60/WIP-KB/(0)0915, effective since 1 September 2015) and also has system for dealing the dispute and complaints receive. This system was refer to Wilmar Group Policy (Version 3, No. 042/DIR-KP/VIII/2015, dated 5 August 2016, The policy was contained of Form of Complaint Data Handling. These document was explained on point 4. Objectives and Policy in Sub point 4.1 was explained that this policy aims to provide assurance to the complainant who already have a good willing to report of alleged abuse or practice of divergence. The complainant will be protected against retaliation or actions that could harm the complainant. Furthermore in point 7 related to Confidentiality, there was explained that the Company encourages the complainant to write clear and complete identity at the time reported the deviations that occur. All forms of reporting irregularities will be guaranteed confidentiality by the company. If the complaints cannot be resolved by consultations, it can follow up to next step or through process to RSPO.

Based on interview with community representatives of Semanga 'and Sub-village Sajingan Kecil known that during land acquisition process, all villager (land-owner) are free to deliver their comments or objection regarding to land acquisition process.

6.3.2

Based on the verification of incoming letter documents and information from the parties when the internal stakeholder consultation (Gender Committee and workers representatives, consultation with relevant agencies in the District Sambas and Stakeholder Consultation with head of village & community representative from Semanga ' Village and Sub-village Sajingan Kecil), there was no information about the complaints of the parties. The document of Complaint List was showed that any aspiration from the workers related to company facilities, for examples aspiration related to damage part of home facilities. The management unit of PT Agronusa Investama was follow up with maintenance the part of home facilities.

Status: Comply

6.4

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

6.4.1 & 6.4.2

The company has the procedures of identification, calculations and Compensation in the form of SOP of Soil / Land Acquisition Technical Guide (SOP 05/WIP-KB/(0)0312, March 2012. Has been shown the examples of record evidence in the process of land acquisition in the form of Agreement Minutes between PT Agronusa Investama with landowners witnessed by the parties, among others: Sub District Head and Village Chief). Also available evidences of Land Submission Letter from each owner / land tenants to PT Agronusa Investama.

Based on the procedures of identification, calculations and Compensation in the form of SOP of Soil / Land Acquisition Technical guidelines (SOP 05/WIP-KB/(0)0312, March 2012, which has been owned by the company, in the past has been made the granting of compensation process for land compensation. It has been shown the evidence of implementation of the existing procedures, namely through the granting of compensation records (land compensation). The company has been filed the resolution processes of land compensation in the past. There was shown an example of

Statement letter of Land Release Agreement which entered the administration area of Satai Sub-Village, Sepantai Village of Sejangkung District on September 22, 2008. The land area of \pm 170 hectares in the measuring image of Land Use Title Plans in PT Agronusa Investama located in the region of Satai Sub-Village, Sepantai Village.

6.4.3

The company was documented all of land compensation process. The documentation comprise of Map, Negotiation result (minutes of meeting), Land Release Letter, Payment Receive was filled in estate office based on land location. Based on Procedure Implementation Mechanism Communication and Consultation With Community SOP 52/WIP-KB/(1) 0911. The documentation of land compensation process are limited access and should approved by Document & Legal Department and Manager of Estate if any related parties will access this document. Theses document can access with letter of Information Request from another parties to the company.

Based on stakeholder consultation with head of village & community representative from Semanga Village and Sub-village Sajingan Kecil) it is known that some time ago, there are no longer processes of land compensation taken by the company. It has been done in the early days.

Status: Comply

6.5

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

6.5.1

Company has work agreement for permanent worker and temporary daily worker which explain about the wages, work hour, duty and responsibility, and other provisions. The wages is in accordance with West Kalimantan Governor Decree No 77/Disnakertrans/2017 about minimum wage and sectorial minimum wage for Sambas Regency as much as Rp 2,275,000 per month. Besides, the company also have wage mechanism for harvester which is the crop prices is based on the planting year and the harvester will get incentive if they have achieved more than the target. Based on interview with worker in estate, they received pay slip document. Based on interview with mill workers (boiler operator and grading operator), the overtime wages is paid according to the overtime hours. Based on study the overtime payment, for example overtime payment for operator WTP, Sorting, and Boiler employees at the Mill, based on the document review it is known that the CH has made overtime payment in accordance with applicable regulations, can be shown by the CH from the attendance list, the calculation of the amount of overtime, the overtime warrant and proof of overtime payment in the salary slip.

Based on a review of the documentary salary slip of 6 contractor employees (CV Pulau Indah) it is known that employees have received the minimum wage in accordance with applicable regulations, in addition to that contractor employees have obtained BPJS facilities

6.5.2

There is work agreement between company and the worker which explain about the wages, work hour, duty and responsibility, and other provisions. However, based on the results of document studies and interviews with management, it is known that there are still Harvest employees who are done by third parties. Non Conformity 2018.05

6.5.3 & 6.5.4

CH has been providing worker with facilities such as homes, worship places, clinic, schools (kindergarten, primary school), sports facilities and also daycare in appropriate conditions. In addition, the company provides transportation for student who attend school in the village around the company. Electricity in housing complex have been provided from generator and the clean water supply provided by the company through the artesian well. For water drinking is provide by company from Reverse Osmosis. Based on interviews with workers and labor union, explained that the number of homes provided by the company have been sufficient for all workers. The workers also equipped by the worker's cooperative that sell basic necessities and have easy access to surrounding villages to get basic necessities.

6.5.2	Status: Non Conformity 2018.05 with Major category
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6.6 The employer respects the right of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.		
6.6.1 There is company's policy related to opportunity for the employee to join the labor union on Internal Memorandum from HRD Head Wilmar International Plantation No. 026/WIP-HRD/Int-VIII/2009. Company facilitates the establishment of labor union (SPSI) to deliver the information from the workers to company and vice versa. The labor union has been registered to Labor Agency of Sambas Regency with registration number is 560/14/STKT-C/2014 dated 7 th May 2014. Based on interview with the worker in ANI Estate, there is no Force for the worker to join the labor union.		
6.6.2 The labor union conducted meeting periodically or where there is an issue with company or the member of union. There are meeting documentation, such as minutes of meeting on 25 th September 2018, attended by 84 participants. The documentation in available in office unit and available for member if they were asking.		
	Status: Comply	
6.7 Children are not employed or exploited.		
6.7.1 Company has Intern Memorandum No 026/WIP-HRD/INT-VIII/2009 about Employee which explain that the company don't recruit worker below 18 years old. Based on document review and field observation, there are no workers under 18 years old. Based on public consultation with Manpower Agency of Sambas District and field observation, there is no issue regarding child labor. Based on interview with with 5 harvest employees, 5 sprayers and 5 fertilizer officers it is known that employees have understood the minimum age limit policy. in addition, based on the results of the document review, it was known that the company had conducted a socialization related to the minimum age limit on 24 November 2018 attended by 18 employees. Based on field observation in estate, auditors did not sighted any harvester accompanied by their wife or children.		
	Status: Comply	
6.8 Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.		
6.8.1 & 6.8.2 Company has policy regarding no discrimination that written on Policy of Equal Opportunity revised on September 2010, signed by Group Plantation Head and Group CSR Head. In the policy is stated that there is no discrimination based on ethnic, religion, disability, gender, sexual orientation, age, and beliefs. This policy is located in each unit and can be accessed publicly. Based on field observation and interview with female worker in day care, it is known that there is no issue or complain from worker regarding discrimination. The workers that has been interviewed is came from various social origin, race, and religion.		
6.8.3 Company kept the personal file of each worker in PGA Department. Based on interview with management, the recruitment is conducted through the company requirement. Worker promotion, mutation or demotion is done through the employee performance assessment. Company showed documentation of employee performance assessment, it explain about the verification of evaluation indicator whether the worker will be promoted or demoted. In 2018 there was no new recruitment but the company made some appointments of employees from daily worker to become permanent employees, for example lifting employees from daily worker drivers (Group IIA) on January 2, 2018, the basis for the appointment was the capabilities of these employees.		
	Status: Comply	
6.9 There is no harassment or abuse in the work place, and reproductive rights are protected.		

6.9.1, 6.9.2, 6.9.3

Company has the procedure about Handling of Sexual Harassment Complaints No SOP 46/WIP-KB (HRD)/(0)/2011. It explains how to make a complaint if there are indications of sexual harassment in the workplace. The procedure has been socialized to the workers on September and November 2018 attended by 66 participants. Based on interview with female workers in Estate, they understood about the complaint mechanism. It is also known that there is no issue or complaint related to sexual harassment on the workplace. Company also form gender committee for handling the harassment issue around female workers. Based on interview with the board of gender committee, the company provides the female worker with pregnant and nursing leave for about 3 months.

Company also has procedure of grievance or complaint No. SOP 60/WIP-KB/(0)/0915 which explain that the identity of the complainant is not revealed to everyone. Based on interview with the worker, they understand the complaint mechanism and there is no complaint from them.

Status: Comply

6.10

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

6.10.1 & 6.10.2

The company has had a fully-managed smallholder scheme with local communities. All FFB production from smallholder area paid refer to monthly price that was approved by Plantation Agency of West Kalimantan Province. FFB price list is publicly available and posted in information board at the front side of the factory area (the Postal Security). Mill does not received FFB from independent smallholders or outgrower. So, there is no FFB pricing mechanism here.

Based on stakeholder consultation with head of village & community representative from Semanga Village and Sub-village of Sajingan Kecil). It is known that FFB prices has been well-socialized and paid according to the regulation.

6.10.3 and 6.10.4

The company has had a contract with local people in order to increasing their local income. For example, 6 month FFB transporting agreement with CV. Pulau Indah from July to November 2019. They has been shown the evidence of payment (bank transferred) on 6 September 2018. All contract has been signed by both in fair and transparent. There is no complaint from the contractor so far.

Status: Comply

6.11

Growers and millers contribute to local sustainable development wherever appropriate.

6.11.1

The contribution to local development is documented in the program of Corporate Social Responsibility for year 2018. Based on document review, the local development is conducted in every aspects, such as infrastructure, environment, economic, health, education, and preservation of customs and culture, as example the development of Elementary school di Senabah Village. Moreover, company has been consulting to the village related to SIA document review which discuss about social monitoring and management plan. The plan for managing CSR in 2018 is the result of consultation with the community in 2017.

6.11.2

Company has full manage smallholders (Sentama Lestari and Cempaka Biru) with total area as much as 1,330.77 Ha. Smallholder operational activity is done by worker from the company To increase the productivity of smallholder, the company has conducted training to the smallholder worker related to best management practice in harvesting, manuring, and spraying. The company has showed the training documentation, such as Best Practice Spraying Training, Safety, RSPO and the other on 28th July 2018 attended by 50 Participants.

Status: Comply

6.12

No forms of Forced or trafficked labour are used.

6.12.1; 6.12.2; 6.12.3

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

Status: Comply

6.13
Growers and millers respect human rights
6.13.1

The company has policy on human rights which explain the kind of human rights for all workers. The policy is conveyed through company outreach to all employees including contractors, suppliers or outsourcing. The person responsible for promoting human rights policy is the PGA and EHS. The policy has been socialized to the workers, as example the socialization on 20th September 2018 attended by 18 participant and 24th November 2018 attended by 18 participants. Based on field observation and interview with worker and internal stakeholder (board of labor union and gender committee), it is known that there is no complaint related to human rights violation. If there is a complaint, the complaint can still be resolved by amicable solution way between employees. The workers also aware about the policy.

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

Until Recertification there was no new development or new land clearing and replanting carried out by PT Agronusa Investama.

Environment analysis document can be seen in Indicator 5.1.1

7.1.2; 7.1.3

Until Recertification there was no new development or new land clearing and replanting carried out by PT Agronusa Investama. Management and environmental monitoring that has been done by the company can be seen in Indicator 5.1.2 and 5.1.3

Status: Comply

7.2

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

7.2.1 & 7.2.2

Until Recertification there was no new development or new land clearing and replanting carried out by PT Agronusa Investama.

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

Until Recertification in 2018 there was no new development or new land clearing and replanting carried out by PT Agronusa Investama.

To ensure that no new plantings in primary forest or HCV area, the company has shown evidence of Liability Disclosure and Land Use Change Analysis (LUCA) has been sent to the RSPO Compensation Panel (rspocompensation@rspo.org) dated April 8/2015. Until Initial Certification 2018 activities, the RSPO is still verifying the reports related to disclosure and compensation liability which has been submitted (Observation).

Status: Comply

7.4

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

7.4.1; 7.4.2

Until Recertification there was no new development or new land clearing and replanting carried out by PT Agronusa Investama.

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.

Until Recertification there was no new development or new land clearing and replanting carried out by PT Agronusa Investama.

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.

Until Recertification there was no new development or new land clearing and replanting carried out by PT Agronusa Investama.

Status: Comply

7.7

Use of fire in the preparation of new plantings is avoided other than in specific situations, as identified in the ASEAN guidelines or other regional best practice.

7.7.1 & 7.7.2

Until Recertification there was no new development or new land clearing and replanting carried out by PT Agronusa Investama.

Status: Comply

7.8

New plantation developments are designed to minimise net greenhouse gas emissions.

7.8.1; 7.8.2

Until Recertification there was no new development or new land clearing and replanting carried out by PT Agronusa Investama.

Calculation of GHG emissions can be seen in Indicator 5.6.3

Status: Comply

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

8.1

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

Best Management Practices

The company has shown documents of continuous improvement such as reducing the use of pesticides such as planting

beneficial plants, reducing the types of pesticides group 1a and 1b and using natural enemies. The company has installed an owl house aimed at using natural enemies (*Tyto alba*) to eradicate rat pests in the plasma area.

Internal Audit SCCS

Facility has conducted internal audit regarding to supply chain on 3 – 7 September 2018. All NC's has been closed after the management review's meeting on October 20th 2018.

Internal Audit RSPO

An internal operational audit (include RSPO) was conducted at PT ANI Sambas POM on September 4, 2018. Based on the results of the internal audit it was found that there were 36 nonconformities and already done on September 2018.

Status: Comply

3.2 Summary of Assessment Report of Supply Chain Requirement

3.2.1. General chain of custody requirements for the supply chain

Clause	Requirement
5.1	Applicability of the general chain of custody requirements for the supply chain
5.1.1	<p>The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. After the end product manufacturer, there is no further requirement for certification.</p> <p>Facility sold all their product to PT. Wilmar Cahaya Indonesia (located in Pontianak). There was no physically handles by outsourcer company such as transporter etc.</p>
	Status: Comply
5.1.2	<p>Traders and distributors require a license obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model.</p> <p>Facility usually sold their product directly to the buyer PT. Wilmar Cahaya Indonesia (located in Pontianak) according to the contract.</p>
	Status: Comply
5.1.3	<p>Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform.</p> <p>PT Agronusa Investama – Sambas POM, has registered in RSPO membership 2-0017-05-000-00 (subsidiary of Wilmar International Limited). Agronusa Investama – Sambas POM has been registered in IT platform palm trace RSPO https://palmtrace.rspo.org/web/rspo/member-directory which information as follows:</p> <ul style="list-style-type: none"> • Member Name: PT Agronusa Investama - Sambas POM • Account UID: RSPO_AC1000002146 • Core Product: Palm Oil • Member ID: RSPO_PO1000002130 • Member Category: Oil Mill
	Status: Comply
5.1.4	<p>Processing aids do not need to be included within an organization's scope of certification.</p> <p>Facility has not using processing aids.</p>
	Status: Comply
5.2	Supply chain model
5.2.1	<p>The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.</p> <p>Facility has applied Mass Balance (Module E) for mill.</p>
	Status: Comply
5.2.2	<p>The site can use one (1) or a combination of supply chain models as audited and certified by the CB.</p>

Facility only using Mass Balance (Module E) for mill.	
	Status: Comply
5.3	Documented procedures
5.3.1 The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified.	
Facility has had documented procedures regarding for receiving and processing certified and non-certified FFB. Mechanism for verifying the incoming FFB, described in several procedures, among others: 1. Procedure of FFB Receive (SOP 02/SRT-ANI/(03)/1018 approved since 4 th October 2018. 2. Procedure of Mass Balance (SOP 12/ADM-ANI/(01)/1018) approved since 11 th October 2018 which contains explanations: <ul style="list-style-type: none"> Incoming FFB process, including through the data input of nucleus and outer FFB acceptance (outsider) with Sustainable FFB status (certified) and Non Sustainable FFB (non-certified) in the appropriate columns. FFB data input process to be a Production Supervisor reports and reports of CPO / PK generated from sounding reports to determine the OER / KER and physical stock of CPO / PK in the appropriate columns. Data input for shipments of CPO / PK from the mill process according to its status (Sustainable or Non-Sustainable Sustainable CPO / PK) in the appropriate columns. Receiving and checking the DO status from Trading Head Office (Request of CSPO or non CSPO). Based on the status of DO Request and the conditions of stock balance, determine the delivery types of CPO / PPK to be performed. Fill the number for CPO / PK shipments according to the number and its status within the dispatch table and update the stock balance conditions based on the comparison of incoming and dispatch. 3. Procedure of internal audit (SOP 23/EHS-ANI/(01)/1018) approved since 11 th October 2018. Internal audit conducted every six month. 4. Procedure of CPO/PK selling (SOP/ANI POM-LOG-005) dated 24 th October 2018. 5. Procedure of management review (SOP 22/EHS-ANI/(02)/1018) dated 11 th Oktober 2018. Management review conducted annually.	
Based on that procedure, person in charge of the supply chain implementation at ANI Sambas POM is the Mill Manager, while the management representative is Evan S. Lumasik in accordance with the Mill Manager Appointment Letter dated February 3 rd , 2018. Management representative task to helping and ensuring sustainable standards and certification requirements that exist in the Wilmar Sustainability Policy.	
<i>Responsibility.</i> <ul style="list-style-type: none"> Providing an assessment of sustainable systems and preventive actions for company management Making management materials and results together with company management. Make a report on the e-trace platform to announce certified delivery for the RSPO SCCS certification system. 	
	Status: Comply
5.3.2 The site shall have a written procedure to conduct annual internal audit	
Facility has conducted internal audit regarding to supply chain on 3 – 7 September 2018. All NC's has been closed after the management review's meeting on October 20 th 2018.	
	Status: Comply
5.4	Purchasing and goods in
5.4.1 The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier.	
Facility has documented all information of their palm oil products buyer as per transaction in their annual book keeping document. For example: there is a sales contract of 750 MT CPO (contract number 4031102699) from ANI Sambas Mill (member ID RSPO_PO1000002130) to the buyer PT. Wilmar Cahaya Indonesia.	

Announcement of the transaction will be updated if mill has obtained RSPO certificate.	
	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 certified product but produce a certified product.	
	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 sold all of their product (CPO/PK) to the buyer PT. Wilmar Cahaya Indonesia (located in Pontianak). Selling point is in mill where all transporting of all product borne by buyer. For example: there is a sales contract of 750 MT CPO (contract number 4031102699) from ANI Sambas Mill (member ID RSPO_PO1000002130) to the buyer PT. Wilmar Cahaya Indonesia.	
	Status: Comply
5.5.2	
Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:	
<ul style="list-style-type: none"> a. The site has legal ownership of all input material to be included in outsourced processes; b. The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary. c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. d. d) The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance 	
Facility sold all of their product (CPO/PK) to the buyer PT. Wilmar Cahaya Indonesia (located in Pontianak). Selling point is in mill where all transporting of all product borne by buyer. For example: there is a sales contract of 750 MT CPO (contract number 4031102699) from ANI Sambas Mill (member ID RSPO_PO1000002130) to the buyer PT. Wilmar Cahaya Indonesia.	
	Status: Comply
5.5.3	
The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	
Facility on has single buyer named PT. Wilmar Cahaya Indonesia (located in Pontianak). All detail of contact are available in mill.	
	Status: Comply
5.5.4	
The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products	
There are no additional contractor.	
	Status: Comply
5.6	Sales and goods out
5.6.1	
The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form: The name and address of the buyer	
Facility on has single buyer named PT. Wilmar Cahaya Indonesia (located in Pontianak). All detail of contact are available in	

mill.	
	Status: Comply
5.7	Registration of transactions
5.7.1	Supply chain actors who: <ul style="list-style-type: none"> are mills, traders, crushers and refineries; and take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable
This indicator will be verify on ASA-1 after mill obtained RSPO certificate. However, personnel in charge in mill has been well-known regarding to book keeping process that should be reported to marketing staff in Jakarta Office for removing stock in RSPO IT Platform.	
	Status: Comply
5.7.2	The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform: <ul style="list-style-type: none"> Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures. Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually. Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed. Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.
This indicator will be verify on ASA-1 after mill obtained RSPO certificate. However, personnel in charge in mill has been well-known regarding to book keeping process that should be reported to marketing staff in Jakarta Office for removing stock in RSPO IT Platform.	
	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 conducted RSPO supply chain training on 28 March 2018 that attended by 7 employees such as security officer, weighbridge, logistic department and EHS. The same training also conducted for another estate and mill employee on 6 September 2018 for mill and estate staff.	
	Status: Comply
5.8.2	Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed
Facility has conducted RSPO supply chain training on 28 March 2018 that attended by 7 employees such as security officer, weighbridge, logistic department and EHS. The same training also conducted for another estate and mill employee on 6 September 2018 for mill and estate staff.	
Based on interview with security and weighbridge operator known that they can demonstrate the separation of FFB from certified or nor certified area. Including of mass balance book-keeping.	
	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
	Facility has shown their book keeping document which is up to date and accessible according to the RSPO Supply Chain Certification Standard requirements. All record can be accessed in Daily FFB Received, Daily CPO/PK production and sales document.
	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
	According to the supply chain procedure, all document regarding to supply chain are kept for 5 years.
	Status: Comply
5.9.3	The organization shall be able to provide the estimate volume of palm oil / palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.
	The input and output certified material (CSPO and CSPK) from ANI-Sambas POM have been well recorded and kept in the office.
	Status: Comply
5.10	Conversion factors
5.10.1	Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org); RSPO Rules for Physical Transition of Oleochemicals and its Derivatives. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries
	Facility did not use conversion rate.
	Status: Comply
5.10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.
	Facility did not use conversion rate.
	Status: Comply
5.11	Claims
5.11.1	The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.
	Facility did not certified yet. Logo usage will be verify after mill obtained RSPO certificate in the next assessment.
	Status: Comply
5.12	Complaints
5.12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.
	Facility has had documented procedures for stakeholder's complaints in CPO/PK Sales procedure.
	Status: Comply
5.13	Management review
5.13.1	

The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken	
According to the management review procedure (SOP 22/EHS-ANI/(02)/1018) dated on 11 October 2018, management review performed annually.	
	Status: Comply
5.13.2 The input to management review shall include information on: <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard. • Customer feedback. • Status of preventive and corrective actions. • Follow-up actions from management reviews. • Changes that could affect the management system. • Recommendations for improvement. 	
According to the management review procedure (SOP 22/EHS-ANI/(02)/1018) dated on 11 October 2018, management review performed annually.	
	Status: Comply
5.13.3 The output from the management review shall include any decisions and actions related to: <ul style="list-style-type: none"> • Improvement of the effectiveness of the management system and its processes. • Resource needs. 	
Facility has conducted internal audit regarding to supply chain on 3 – 7 September 2018. All NC's has been closed after the management review's meeting on October 20 th 2018.	
	Status: Comply

3.2 Summary of Assessment Report of Supply Chain Requirements

Clause	Requirement
E.1	Definition
E.1.1	<p>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.</p> <p>Based on document and field observation in mill found that ANI Sambas Mill receiving FFB from own estate and smallholder which is outside the certification scope. According to the weighbridge system, there was a separation between FFB certified and noncertified supplier. Based on that, mill choose module E – mass balance.</p>
	Status: comply
E.2	Explanation
E.2.1	<p>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.</p> <p>Facility has estimated CPO/PK produced during the certification period. See detail in chapter 1.0 section 1.8 tonnage product of this report.</p>
	Status: comply
E.2.2	<p>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).</p> <p>PT Agronusa Investama – Sambas POM, has registered in RSPO membership 2-0017-05-000-00 (subsidiary of Wilmar International Limited). Agronusa Investama – Sambas POM has been registered in IT platform palm trace RSPO https://palmtrace.rspo.org/web/rspo/member-directory which information as follows:</p> <ul style="list-style-type: none"> • Member Name: PT Agronusa Investama - Sambas POM • Account UID: RSPO_AC1000002146 • Core Product: Palm Oil • Member ID: RSPO_PO1000002130 • Member Category: Oil Mill
	Status: comply
E.3	Documented procedures
E.3.1	<p>The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:</p> <ol style="list-style-type: none"> Complete and up to date procedures covering the implementation of all the elements in these requirements; The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site procedures for the implementation of this standard.

Facility has had documented procedures regarding for receiving and processing certified and non-certified FFB. Mechanism for verifying the incoming FFB, described in several procedures, among others:

1. Procedure of FFB Receive (SOP 02/SRT-ANI/(03)/1018 approved since 4th October 2018.
2. Procedure of Mass Balance (SOP 12/ADM-ANI/(01)/1018) approved since 11th October 2018 which contains explanations:
 - Incoming FFB process, including through the data input of nucleus and outer FFB acceptance (outsider) with Sustainable FFB status (certified) and Non Sustainable FFB (non-certified) in the appropriate columns.
 - FFB data input process to be a Production Supervisor reports and reports of CPO / PK generated from sounding reports to determine the OER / KER and physical stock of CPO / PK in the appropriate columns.
 - Data input for shipments of CPO / PK from the mill process according to its status (Sustainable or Non-Sustainable Sustainable CPO / PK) in the appropriate columns.
 - Receiving and checking the DO status from Trading Head Office (Request of CSPO or non CSPO).
 - Based on the status of DO Request and the conditions of stock balance, determine the delivery types of CPO / PPK to be performed.
 - Fill the number for CPO / PK shipments according to the number and its status within the dispatch table and update the stock balance conditions based on the comparison of incoming and dispatch.
3. Procedure of internal audit (SOP 23/EHS-ANI/(01)/1018) approved since 11th October 2018. Internal audit conducted every six month.
4. Procedure of CPO/PK selling (SOP/ANI POM-LOG-005) dated 24th October 2018.
5. Procedure of management review (SOP 22/EHS-ANI/(02)/1018) dated 11th Oktober 2018. Management review conducted annually.

Based on that procedure, person in charge of the supply chain implementation at ANI Sambas POM is the Mill Manager, while the management representative is Evan S. Lumasik in accordance with the Mill Manager Appointment Letter dated February 3rd, 2018. Management representative task to helping and ensuring sustainable standards and certification requirements that exist in the Wilmar Sustainability Policy.

Responsibility:

- Providing an assessment of sustainable systems and preventive actions for company management
- Making management materials and results together with company management.
- Make a report on the e-trace platform to announce certified delivery for the RSPO SCCS certification system.

Status: comply

E.3.2

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

Facility has had documented procedures regarding to certified and noncertified FFB's in document Procedure of Mass Balance (SOP 12/ADM-ANI/(01)/1018) approved since 11th October 2018 which contains explanations:

- Incoming FFB process, including through the data input of nucleus and outer FFB acceptance (outsider) with Sustainable FFB status (certified) and Non Sustainable FFB (non-certified) in the appropriate columns.
- FFB data input process to be a Production Supervisor reports and reports of CPO / PK generated from sounding reports to determine the OER / KER and physical stock of CPO / PK in the appropriate columns.
- Data input for shipments of CPO / PK from the mill process according to its status (Sustainable or Non-Sustainable Sustainable CPO / PK) in the appropriate columns.
- Receiving and checking the DO status from Trading Head Office (Request of CSPO or non CSPO).
- Based on the status of DO Request and the conditions of stock balance, determine the delivery types of CPO / PPK to be performed.
- Fill the number for CPO / PK shipments according to the number and its status within the dispatch table and update the stock balance conditions based on the comparison of incoming and dispatch.

Status: comply

E.4

Purchasing and goods in

E.4.1

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

Facility does not certified yet. However, mill can demonstrate separation of certified and non-certified FFBs received in their system.

Status: comply

E.4.2

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

Informing CB's regarding of overproduction from projected certified tonnage has been covered in mill procedures.

Status: comply

E.5

Record keeping

E.5.1

- The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.
- All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.
- The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a site is allowed to sell short. (i.e. product can be sold before it is in stock.)

Facility has shown and demonstrated their book keeping document which is up to date and accessible according to the RSPO Supply Chain Certification Standard requirements. It can be verify in Daily FFB Received, Daily CPO/PK production and sales document.

Period 12 months	CPO Production (MT)		Total	Cert CSPO Dispatch (MT)			Total
	Cert	Non Cert		RSPO	Other scheme	Conventional	
Total	27,540.39	3,443.96	30,984.35	0	0	26,040	26,040

Period 12 months	PK Production (MT)		Total	Cert CSPK Dispatch (MT)			Total
	Cert	Non Cert		RSPO	Other scheme	Conventional	
Total	6,396.56	1,266.33	7,662.89	0	0	5,896	5,896

Status: comply

3.3 Conformity Checklist of Certificate and Logo Use

1.	Evidence of permission or approval certificate and logo from Certification Body which submitted by Client	X or ✓
RC	The PT Agronusa Investama & ANI Sambas POM has had approval/permit the use of the certificate with the number MUTU-RSPO/024	✓
	Status: Comply	
2.	Implementation of certificate and logo used by Client comply with size and type (shape) against Guideline of Logo Use	X or ✓
RC	The PT Agronusa Investama does not use the logo both in the on-product and off-product.	✓
	Status: Comply	
3.	Implementation of Certificate and Logo is not used on product	X or ✓
RC	The PT Agronusa Investama does not use the logo both in the on-product and off-product.	✓
	Status: Comply	
4.	Controlling of Certificate and Logo, including withdrawing inappropriate logo.	X or ✓
RC	The PT Agronusa Investama does not use the logo both in the on-product and off-product.	✓
	Status: Comply	

3.4 Summary of RSPO 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 August 2019.

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>Auditor verification</p> <p>There is internal audit produced for</p> <ul style="list-style-type: none"> - PT Agronusa Investama Pahauman - PT Agro Palindo Sakti 2 - PT Musi Banyuasin Indah - PT Sinarsiak Dianpermai - PT Agroindo Indah Perkasa 2 <p>And positive assurance is produced for these units.</p>
2.1.2	<p>No replacement after dates defined in Nis Criterion 7.3 of:</p> <ul style="list-style-type: none"> • Primary forest. • Any area identified as containing High Conservation Values (HCVs). • Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3. 	<p>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"> - PT Agronusa Investama Pahauman, LUCA document was verified by RSPO on 1 Sept 2015. The 2nd LUCA verification document was on 2nd Nov 2015 with result of PASS WITH CLARIFICATION. - 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 ha therefore there is no compensation plan required

		<ul style="list-style-type: none"> - PT Agro Palindo Sakti 2, LUCA doc was verified by RSPO on 1 Sept 2015. The 2nd LUCA review was on Dec 2016 with result of PASS - PT Musi Banyuasin Indah, 0 liability confirmed by RSPO Compensation. There is no planting after 1 November 2005 - PT Sinarsiak Dianpermai, 0 liability confirmed by RSPO Compensation. There is no planting after 1 November 2005 - PT Agroindo Indah Perkasa 2, 0 liability confirmed by RSPO Compensation. There is no planting after 1 November 2005 <p>Auditor verification Auditor has verified the supporting evidence of above the company statement. The above statement in accordance with the supporting evidence provided.</p>
2.1.3	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>No new planting/land clearing after 1st January 2010.</p> <p>Auditor verification</p> <ul style="list-style-type: none"> - 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. - There is no new planting after 1st January 2010 for, PT Bumipratama Khatulistiwa, PT Agro Palindo Sakti 2, PT Musi Banyuasin Indah, PT Sinarsiak Dianpermai, PT Agroindo Indah Perkasa 2
2.1.4	Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	<p>There is no land conflicts.</p> <p>Auditor verification 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>Auditor verification</p>

		<p>There is no information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries.</p> <p>The company has 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 grievance 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>Auditor verification</p> <p>PT Agronusa Investama Pahauman</p> <ul style="list-style-type: none"> - 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. <p>PT Agro Palindo Sakti 2</p> <ul style="list-style-type: none"> - 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 Bupati Sanggau Decree No. 137 year 2011 dated 25 March 2011 for 623 ha of smallholder scheme for 2 koperasi of Batu Ceramin 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. <p>PT Musi Banyuasin Indah</p> <ul style="list-style-type: none"> - Overlay the map of land use with attachments Ministerial Decree No. SK.822/Menhut-II/2013 PT MBI entered in production forest area. - Planting outside HGU Kebun Sei Selabu (block 010, 024 and 027). <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"> - HGU 1,002 Ha on process - 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 <p>Explanation management unit as follows:</p> <ul style="list-style-type: none"> - 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. - 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. - The legal department is still doing continuous coordination with the government while waiting for a change of government decisions. <p>PT Agroindo Indah Perkasa 2</p> <ul style="list-style-type: none"> - There is HGU on propose.
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3.5 Identification of Findings, Corrective Action, Observations, OFI and Noteworthy Positive Components
3.5.1 Identification of Findings, Corrective Actions and Observations at Initial Certification Assessment

NCR No.	: 2018.01	Issued by	: Satria Adi Putra
Date Issued	: 30 November 2018	Time Limit	: 29 November 2019
NC Grade	: Major	Date of Closing	: 11 July 2019
Standard Ref. & Requirement	2.1.1 Proof of compliance with relevant laws and regulations must be available		
Evidence observed (filled by auditor): Based on the results of interviews and document studies in the ANI Sambas POM, it is known that the sterilizer and welder operators do not have an Operating Permit (SIO).			
Non-Conformance Description (filled by auditor): The company has not been able to show evidence that sterilizer and welder operators have had an Operating Permit in accordance with Permenaker 37 of 2016 (regarding pressure vessels and storage tanks) and Minister of Labor Regulation No.2 of 1982 (regarding Welding Qualifications at work).			
Root Cause Analysis (filled by organization audited): <ul style="list-style-type: none">- The unit does not have a matrix of training needs for each department of work- Not programmed to take part in certification training			
Correction (filled by organization audited): <ul style="list-style-type: none">- Make a matrix of training training needs with reference to the needs of each work in the unit.- Schedule training programs to obtain sterilizer SIO operators and welders certification training			
Corrective Action (filled by organization audited): Include sterilizer operators who do not have licenses and welders who do not have a training license to get a license.			
Assessor Evaluation and Conclusion (filled by auditor): The company has shown evidence of improvements including: <ul style="list-style-type: none">- Evidence of registration (email) regarding the sterilizer operator and welder training on April 16, 2019. Based on the email it was found that the training and certification of steam operators (boilers and sterilizers) were carried out on April 22-27, 2019 and the welder training was held in June 2019.- Minutes of the implementation of training and certification of steam operators (boilers and sterilizers) on 22-27 April 2019, the training was attended by 32 workers with 4 participants coming from PT ANI Sambas POM. Based on the evidence of improvement provided, the auditor team still needs additional additional evidence, namely the training needs matrix for each work in the unit, according to the root cause analysis and correction mentioned. Related to this, the non conformity No. 2018.01 is still unfulfilled (Open).			
Verification July 11 2019 The company has shown evidence of improvements including: <ul style="list-style-type: none">- PT ANI Sambas training matrix in 2019 which contains the type of socialization/traning, including the sterilizer			

and welder training program.

- Certificate No. 238 / SK / VIII / 2019 from PT Tranindo Pratama Mulia dated July 2, 2019 stating that employees on behalf of Rudi YS, MW Sugian and Sugianto (PT ANI Sambas) will attend Jurulas / Welder certification training on August 8-12 2019 at the Training Center PT Wilmar Group, Sampit, Central Kalimantan.

Based on the results of evidence of improvements that have been given, the non-conformity No. 2018.01 has been declared fulfilled and will be verified again at the next visit.

Verified by : Satria Adi Putra

NCR No.	:	2018.02	Issued by	:	Andi Pratama Pasaribu
Date Issued	:	30 November 2018	Time Limit	:	Next surveillance
NC Grade	:	Minor	Date of Closing	:	
Standard Ref. & Requirement	:	2.2.2 The boundaries of legal territory must be clearly defined and seen to be taken care of.			
Evidence observed: Based on the results of the document review, currently the corporate management area refers to the map of land area No. 23/2018 issued by the Office of the Ministry of ATR / BPN dated July 10, 2018 (Directorate General of Infrastructure, Directorate / Directorate of Measurement and Cadastral Mapping). Referring to the map of the land, there are indications of a management area that is outside the field map (new location permit of ± 1,024 Ha and Production Forest area of ± 134.51 Ha). The results of field visits with management staff have shown some clear demarcation boundaries as in the form of cadastral stakes and boundary ditches with Production Forest areas.					
Non-Conformance Description For the above evidence, the following discrepancies were identified: 1. Statement of the company's management area (hectar statement) issued officially by top management. 2. Statement of the company's attitude in relation to Production Forest areas that are no longer managed, both nucleus and plasma plantations.					
Root Cause Analysis <i>(filled by organization audited):</i> The unit has not yet closed the extensive data update system that adjusts the field map submitted to the BPN Ministry office					
Correction <i>(filled by organization audited):</i> Closing the GIS update system and units for the hectare statement that has adjusted to the area map area that has been submitted to the BPN ministry office					
Corrective Action <i>(filled by organization audited):</i> Create and report an updated statement area					
Assessor Evaluation and Conclusion <i>(filled by auditor):</i>					
Verified by	:				

NCR No.	: 2018.03	Issued by	: Ebnu Holdoon Shawal
Date Issued	: 30 November 2018	Time Limit	: Next surveillance
NC Grade	: Minor	Date of Closing	:
Standard Ref. & Requirement	: 5.3.3 A documented and implemented waste management plan must be available to avoid and reduce pollution.		
<p>Evidence observed: Based on the results of the audit it was found that:</p> <ol style="list-style-type: none"> During the field visit in Block 104B Phase 1 of the Outbreak Division, there was identified a Final Waste Disposal Site (TPSA) which functions as Phase 1, 2, 3 and 4 domestic waste collection locations. The distance between housing / residential settlements is estimated to be less than 1 km . The results of the review of the Housing Solid Waste Management SOP document (SOP 013 / WIP-KB (0) / 0610) which took effect from January 2011 stated that the distance between the TPSA and the housing is at least 300 meters. The results of field visits to the planting blocks around PKS found that there were solid placements that were not in accordance with the Solid Decanter Management SOP (SOP 25 / EHS-ANI / (00) / 0113) which stated that solid disposal must be in a predetermined location. The area has been installed with a signboard prohibiting solid disposal in the area. 			
<p>Non-Conformance Description Based on the results of the audits carried out the following discrepancies were identified:</p> <ol style="list-style-type: none"> The placement of TPSA is not in accordance with Part Two Article 23 Government Regulation No. 81 of 2012 concerning Household Waste Management and Household-like Waste. Solid application (decanter cake) is not in accordance with established procedures. 			
<p>Root Cause Analysis <i>(filled by organization audited):</i></p> <ol style="list-style-type: none"> The SOP on the management of residential solid waste has not been adjusted to government regulation No. 81 of 2012 For solid applications: the problem of damage to the road to the designated final solid disposal site is damaged due to the rainy season resulting in truck drivers throwing solid in any place that is easily accessible. 			
<p>Correction <i>(filled by organization audited):</i></p> <ol style="list-style-type: none"> Adjust and do SOP review The management of residential solid waste adapts to updated and relevant regulations. Repairing the road to solid disposal that has been determined and carrying out disciplinary affirmation to the driver truck in the task of solid disposal to be sure to dispose of solid in the place agreed upon by the estate and ANI Sambas POM. 			
<p>Corrective Action <i>(filled by organization audited):</i></p> <ol style="list-style-type: none"> Revision of SOP for Solid Waste Management for housing, make a map of waste disposal points and measure the distance from housing. Dispose of solid in a place that has been provided and agreed upon by PT ANIS Estate and POM 			
<p>Assessor Evaluation and Conclusion <i>(filled by auditor):</i></p>			
Verified by	:		

NCR No.	: 2018.04	Issued by	: Ebnur Holdoon Shawal
Date Issued	: 30 November 2018	Time Limit	: Next surveillance
NC Grade	: Minor	Date of Closing	:
Standard Ref. & Requirement	6.2.3 List of stakeholders, records of all communications, including confirmation of receipts and efforts to ensure understanding of all affected parties, and a record of all actions taken in response to stakeholder input, must be properly maintained.		
Evidence observed: Based on the results of the audit it was found that: 1. The company has a Complaints Management / Handling Procedure (SOP 60 / WIP-KB (0) / 0915) clause 12, which states that every incoming complaint must be recorded in a complaint form provided in each work unit / operational unit. The complaint form is recorded in the complaint book registering complaints. Recording is done by administrative staff managing complaints. 2. The results of field visits are known to have several employee complaints submitted to the auditor but not documented according to the above procedure. 3. The results of the document review, the book cannot register the complaint according to the procedure above.			
Non-Conformance Description Based on the facts above, it was concluded that the company had not implemented a record of complaints / complaints in accordance with established procedures.			
Root Cause Analysis <i>(filled by organization audited):</i> <ul style="list-style-type: none"> - The unit has not implemented the procedure for receiving complaints. - The unit does not provide registers and logbooks to record complaints in units received verbally by employees and the public. 			
Correction <i>(filled by organization audited):</i> <ul style="list-style-type: none"> - Disseminate information to staff and PIC office about procedures for receiving complaints - Providing a complaint register 			
Corrective Action <i>(filled by organization audited):</i> Record and respond to employee complaints in accordance with the procedure for receiving complaints that apply in the PT ANIS unit.			
Assessor Evaluation and Conclusion <i>(filled by auditor):</i>			
Verified by	:		

NCR No.	: 2018.05	Issued by	: Bayu Yogatama
Date Issued	: 30 November 2018	Time Limit	: 29 November 2019
NC Grade	: Major	Date of Closing	: 4 October 2019

Standard Ref. & Requirement	6.5.2 Labor law, trade union agreements or direct employment contracts that specify payments and conditions of work (for example working hours, deduction, overtime, sickness, holiday rights, reasons for dismissal, notice of termination of employment, etc.) must be available in a language that can be understood by workers or carefully explained to workers by management officers.
Evidence observed (filled by auditor): <ul style="list-style-type: none"> Based on the Study of Letter Documents for Work Contracts for Wholesale harvest activities No. 101 / 11A. Plasma / ANI-UT / II / 2018; No 102 / 11A. Plasma / ANI-UT / II / 2018; No. 103 / 11A. Plasma / ANI-UT / II / 2018 with the name contractor Ramadan, Nurhadi and Endang Ernawati dated 1 October 2018 for harvesting activities at the Sentama Lestari Plasma which is valid until 31 October 2018. SK GAPKI February 8, 2013 concerning Main Work. Based on the Review of Minister of Manpower Regulation No. 19 of 2012 concerning the requirements for partial submission of work to other companies article 3 paragraph 1 and 2. Non-Conformance Description (filled by auditor): There is still the main work (harvest) done by a third party.	
Root Cause Analysis (filled by organization audited): <ul style="list-style-type: none"> The selection of employees uses a 3rd party by KSU Sentama Lestari for cost effectiveness KSU Sentama Lestari's lack of understanding regarding labor regulations. 	
Correction (filled by organization audited): Socialize to the KSU about labor regulations that the main work cannot be done by a third party and follow the applicable labor regulation policies.	
Corrective Action (filled by organization audited): <ul style="list-style-type: none"> Record the number of Sentama Lestari KSU harvesters Registering KSU Sentama Lestari harvest workers as employees registered with PT ANI Sambas 	
Assessor Evaluation and Conclusion (filled by auditor): Verification July 11 2019 <ul style="list-style-type: none"> Letters of Recommendation for Harvest Workers from Sentama Lestari Cooperative with number 08 / KSU-SL / III / 2019 dated March 26, 2019, which contains: Sentama Lestari Cooperative willingness to register employees who have been working in plasma to become employees of the company. All costs incurred for the employee in full are borne by the Sentama Lestari Cooperative. List of names of the recommendations of 15 employees proposed by the cooperative to be appointed as company employees with details: <ul style="list-style-type: none"> Misdi Clouds Kino Sutardi Grace Herwan Suyanto Gunawan Ruli Arfandi M Zainul Mas'i 	

- Deki
- Sugiono
- M Ali
- Marhadi
- Illiyasa

Verification October 4, 2019

The company showed evidence of improvement in the form of a decree for the appointment of 6 employees from 15 names proposed by the cooperatives, 9 others were no longer working. The following are examples of decree shown by the company.

SK No: 263 / ANI-HRR / SK / X / 2019 a.n Marhadi as Group 2A Harvesters

SK No: 264 / ANI-HRR / SK / X / 2019 a.n Sadol as Harvesters of Class 2A

SK No: 265 / ANI-HRR / SK / X / 2019 a.n Misdi as Harvesters of Class 2A

SK No: 266 / ANI-HRR / SK / X / 2019 a.n Gunawan as Harvesters of Class 2A

SK No: 267 / ANI-HRR / SK / X / 2019 a.n Muhamad Fate as Harvesting Group 2A

SK No: 268 / ANI-HRR / SK / X / 2019 a.n Anan as Harvesters of Group 2A

Based on the results of evidence of improvements that have been given, the non-conformity No. 2018.05 was declared as fulfilled and will be verified again at the next visit.

<i>Verified by</i>	:	Bayu Yogatama
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3.5.3 Opportunity for Improvement

No	Ref. Std.	Description
1	2.2.1	Opportunity to ensure management of land rights
2	4.3.3	Opportunities in improving road quality
3	4.4.2	The company has the opportunity to ensure that the buffer zone is maintained
4	4.6.7	The company has the opportunity to ensure the flow of knapsack washing water and rinse is collected in the space provided.
5	4.7.2	The company has the opportunity to ensure that all worker understands related to OHS socialization
6	System Certification (Point 4.5.3)	Ensure Timebound Plan for Pusaka Abadi Nan Jaya Cooperative and Anugrah Semaro Cooperative

3.5.4 Noteworthy Positive Components

No	Descriptions
1	The company's commitment to implementing the principles of sustainable management of oil palm.
2	Responsible Personnel in Charge (PIC) assisted during the audit.







3.6 Summary of Arising Issues from Public and Auditor Verification

Public Issues (Institution/ NGO/Community)	Auditor Verification
Food and Agriculture Departement of Sambas District (Plantation Division). <ul style="list-style-type: none"> Relations between the company and the Service are well established. Companies make mandatory reporting regularly Such as (LPUP). There is already a smallholder and is already running. The company is required to maintain the peat area. There is no fire related information so far. 	<p>The company has complied the regulation related to plantation permit. Auditor has verified the compliance towards indicator 2.2.1, 1.1.1 and criteria 2.3, 6.4, 6.11</p>
National Land Agency of Sambas District <p>The interview did not done because the personnel in charge related to information request by the auditor was not in the office</p>	-
Housing, Settlement and Environment Departement of Sambas District (Environmental Division) <ul style="list-style-type: none"> Relations between the company and the Service are well established. The company has had environmental documents (EIA). The company has had hazardous waste storage approved by local government. The company has had permit from local government regarding disposal of waste water treatment plants to water or water sources. The company already has permission to study land applications. The test results periodically sent to the local government. Companies make mandatory reporting regularly. There is no issue of environmental pollution. 	<ul style="list-style-type: none"> The Company has a document on Environment Impact Assessment (EIA) approved by the EIA Commission, on behalf of Minister of Forestry No. 635 / Menhut-II / 2001 dated May 1/2001. It was in accordance with indicators 5.1.1 The company has had hazardous waste storage approved by local government (SK No. 422 / BLH / 2016, May 16, 2016 (period of validity of 5 years). It was in accordance with indicators 4.6.6 The test results periodically sent to the local government. It was in accordance with indicators 4.4.3
Manpower and Transmigration Departement of Sambas District (Disputes and industrial relations division) <ul style="list-style-type: none"> Relations between the company and the Service are well established. Companies make mandatory reporting regularly. The wages of all workers have been paid in accordance with the local government (UMSK). 	<ul style="list-style-type: none"> The wages of all workers have been paid in accordance with the local government (UMSK). It was in accordance with indicators 6.1.5

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> The Company has provided housing, water, electricity, masques, clinics, etc. to workers. All workers have registered with the program BPJS. There is an accident at the companies There are no child laborers under age at the companies There have been cases of industrial relations such as mutation problems, sick and old age employees who are still BHL, but have been resolved. There are no foreign workers at the companies. There are no labor discrimination at the companies. 	<ul style="list-style-type: none"> The Company has provided housing, water, electricity, masques, clinics, etc. to workers. It was in accordance with indicators 6.5.3 All workers have registered with the program BPJS. It was in accordance with indicators 4.7.6
Gender Committee PT ANI Sambas <ul style="list-style-type: none"> The work program has not been written, but it has been implemented such as the socialization of sexual harassment and its mechanism (Last on September 2018). The Gender Committee was established in 2014. Mechanism in writing and documented in a separate book. There is protection of the complainant. No reports of sexual harassment and family violence. Socialization of work program implemented to employees housing. 	<ul style="list-style-type: none"> This is in accordance with criteria Criteria 6.9.1; 6.9.2
Work Unit of PT ANI Sambas Federasi Serikat Pekerja Transportasi Indonesia – Serikat Pekerja Seluruh Indonesia (FSPTI - SPSI) <ul style="list-style-type: none"> The company gives freedom of association to all workers to form associations or become union members. Membership is marked by a membership card and payable monthly of Rp 10.000,- deducted from salary. If there is a recording of the meeting both internally and externally between the company and the Workers Union it will be stored in the central document of each unit. Any change of board then there is an internal company approval and reporting to the the relevant government departments. The company has applied the minimum wage in accordance with the decree of the Governor of West Kalimantan. Currently applicable is the Sectoral Minimum Wage. Currently contract and daily workers are already being appointed as permanent workers. Currently, Coleective Labour Agreements is still valid for the period of 2017-2019. The Company has registered the membership of BPJS for workers either Employment and Healthy. Health services are also provided by the company in the form of first aid 	<ul style="list-style-type: none"> Freedom of association has been facilitated by the company and made its policy. The company has presented documents on union formation and meetings both the Company and internal SPSI. The number of SPSI members has been verified. The company has implemented the minimum wage sectoral for example the calculation of daily employee wage since January 1, 2018 is set at Rp 2.275.000 - per month and for 2019 the minimum wage sectoral is Rp 2,458,000,- The Company has provided proof of payment of BPJS employment for all employees. The company has provided employment opportunities and no discriminatory treatment in employment and industrial relations.

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>rooms that act only as first aid checks before being referred to the hospital.</p> <ul style="list-style-type: none"> Companies provide opportunities to work for local communities openly. There are no crucial employment and industrial issues. All is still in a talkable stage. 	
<p>Local Contractor – FFB Supplier Kaharudin</p> <ul style="list-style-type: none"> The supplier (Kaharudin) is buying FFB from the community by pricing according to market prices. The price for FFB to ANI Sambas POM as determined by the POM. Contract with company is every year with Long-term contract. Pricing of the POM is determined by the group head office. There are 3 suppliers under the cooperation of PT ANI Sambas. The process of receiving suppliers from the surrounding villages will be assessed by survey related to the permit of the legality, here must be own land, cannot be from illegal FFB. The point is there is a clear clearness before set to become a supplier. 	<ul style="list-style-type: none"> This is in accordance with Criteria 6.10
<p>Local Contractor – Civil Contractor from Semanga Village. CV Pulau Indah</p> <ul style="list-style-type: none"> 4 years working with the company from the civil, replanting, transportation contract. Currently still in cooperation in the street maintenance and bridge (25 unit) housing repair of G10 employee in barracks in Srimaram rooftop servicing etc. Contract work with plantation office. Payment is timely in accordance with the work agreement. The work agreements already included aspects of OHS and employment. The company provides employment opportunities for local contractors. The employment of contractor already had a health assurance (BPJS) 	<ul style="list-style-type: none"> This is in accordance with Criteria 6.10
<p><u>KSU Cempaka Biru</u></p> <ul style="list-style-type: none"> Plasma management is entirely done by KSU All area OF KSU Cempaka Biru as 472 Ha (for each people= 2.08 Ha – 216 Head Family) The agreement limit is valid for 25 years Price of FFB according to the price of Plantation Agency 	<ul style="list-style-type: none"> The company explained that the relationship between the company and KUD is only about buying and selling of FFB Payment of FFB purchases is in accordance with criteria 6.10

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> Fines and Grading Criteria are known The financial calculation is approved in advance by the KSU before payment is made, Payment is made on time 	<ul style="list-style-type: none"> The Company has shown evidence of RSPO socialization and there is a statement that explains the absence of the RSPO program.
<p>Public consultation with village representatives from Semanga and Sajingan Kecil</p> <ul style="list-style-type: none"> The company is come from take over. Previous management has not resolved land dispute issues. The company has built smallholder for local people. There is no land dispute issues or compensation payment which cannot be fulfilled. The company has sharing job opportunities for local people and distributed CSR annually. 	<p>As written in principle 2 and 6.</p>

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY		
4.1	Formal Sign-off of Assessment Findings		
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <table><tr><td><p>PT Agronusa Investama Management Representative</p><p><u>Fauzie Orbanta</u> Friday, 04 October 2019</p></td><td><p>Mutuagung Lestari</p><p><u>Andi Pratama Pasaribu</u> Friday, 04 October 2019</p></td></tr></table>	<p>PT Agronusa Investama Management Representative</p>  <p><u>Fauzie Orbanta</u> Friday, 04 October 2019</p>	<p>Mutuagung Lestari</p>  <p><u>Andi Pratama Pasaribu</u> Friday, 04 October 2019</p>
<p>PT Agronusa Investama Management Representative</p>  <p><u>Fauzie Orbanta</u> Friday, 04 October 2019</p>	<p>Mutuagung Lestari</p>  <p><u>Andi Pratama Pasaribu</u> Friday, 04 October 2019</p>		

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

No	Institution/NGO/ Community	Address	Phone/Email	Form of Communication	Date of Contact	Response	
						Yes	No
1	National Land Agency (Badan Pertanahan Nasional) District of Sambas	District of Sambas	-	Visiting	27 November 2018		✓
2	Housing, Settlement and Environment Departement of Sambas District (Environmental Division)	District of Sambas	-	Interview	27 November 2018	✓	
3	Food and Agriculture Departement of Sambas District (Plantation Division)	District of Sambas	-	Visiting	27 November 2018	✓	
4	State Department of Manpower, Social and Transmigration (Dinas Tenaga Kerja, Transmigrasi dan Sosial) District of Sambas	District of Sambas	-	Interview	27 November 2018	✓	
5	NGOs (AMAN, Walhi and WWF Indonesia)	-	rumahaman@cbn.net.id informasi@walhi.or.id wwf-indonesia@wwf.or.id	Letter and questionnaire via email	19 November 2018		✓
6	Community leaders of Semanga Village and Sajingan Kecil Village (Include Board of Cempaka Biru and Sentama Lestari Smallholders)	Sub. District of Sejangkung, District of Sambas, Province of Kalimantan Barat	-	<i>Focus Group Discussion</i>	20 February 2017	✓	
7	Labour union (SPSI)	Sub. District of Sejangkung, District of Sambas, Province of Kalimantan Barat	-	Interview	27 November 2018	✓	
8	Gender Committee	Sub. District of Sejangkung, District of Sambas, Province of Kalimantan Barat	-	Interview	27 November 2018	✓	
9	KSU Cempaka Biru	Sub. District of Sejangkung, District of Sambas, Province of Kalimantan Barat	-	Interview	27 November 2018	✓	
10	CV Pulau Indah	Sub. District of Sejangkung, District of Sambas, Province of Kalimantan Barat	-	Interview	27 November 2018	✓	
11	FFB Supplier	Sub. District of	-	Interview	27	✓	

		Sejangkung, District of Sambas, Province of Kalimantan Barat			November 2018		
12	ANI Sambas POM - 1 security - 1 operator weight bridges - 1 warehouse worker - 1 operator WWTP - 1 Operator WTP - 2 operator workshop - worker in grading area - 2 operator sterilixer - 1 operator engine room - 1 operator kernel - 1 operator press - 1 operator clarifier - 1 operator Boiler	Sub. District of Sejangkung, District of Sambas, Province of Kalimantan Barat	-	Interview	27 November 2018	✓	
13	Senabah Estate & Senatama Lestari Smallholders - 1 worker Hazardous Waste Warehouse - 1 worker Daycare - 2 worker Clinic - 4 Harvester - 4 Spray worker	Sub. District of Sejangkung, District of Sambas, Province of Kalimantan Barat		Interview	28 November 2018	✓	
14	Kumpai Estate and Cempaka Biru Smallholder - 1 worker Hazardous Waste Warehouse - 1 worker Daycare - 2 worker Clinic - 3 Harvester - 3 Spray worker	Sub. District of Sejangkung, District of Sambas, Province of Kalimantan Barat		Interview	29 November 2018	✓	

Appendix 2. Assessment Program

DATE	26 November - 1 December 2018	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 26 November 2018		
05.20 – 06.55	Jakarta → Pontianak (Garuda GA 500)	• ALL Team
12.20 – 13.05	Pontianak → Plantation Area of PT Agronusa Investama	• ALL Team
Tuesday, 27 November 2018		
08.00 – 12.00	<ul style="list-style-type: none"> Stakeholders consultation to Related Government Institution (Sambas District Government and local NGO) Opening Meeting <ul style="list-style-type: none"> Auditee Speech (Introduction of PIC, Profile of Mill and Estate Management and Unit) Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Determine of Field Visit, Transparency and Confidentiality Clarification) Document Review, Verification of Previous Non-Conformance Record and Verification Document Stakeholders consultation to Nearest village, community leader. Stakeholders consultation to Local Contractor, Workers Union, Gender Committee. 	<ul style="list-style-type: none"> BYG APP/EHS/SAP APP/EHS/SAP APP/EHS SAP
12.00 – 14.00	BREAK	ALL Team
14.00 – 17.00	<ul style="list-style-type: none"> Field Observation to ANI Sambas POM <ul style="list-style-type: none"> Supply Chain verification FFB Receiving, Weighbridge, FFB Sorting, Processing Activity, Despatch CPO) – Include OHS Aspects Environmental, Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, POME Pond) Occupational Health & Safety Aspect, Document Verification 	• ALL Team
Wednesday, 28 November 2018		
08.00 – 12.00	Field Observation Agronusa Investama Estate <ul style="list-style-type: none"> Manuring, Spraying, Harvesting, EFB application, best agricultural practices Worker Welfare (payments, complaint mechanism) Hazardous Waste Material (B3) management; Worker facilities (housing, health clinic, clean water, etc), Land Fill, and Land Fire facilities, Storage, ect. Legal operational and Conservation Area 	<ul style="list-style-type: none"> SAP/BYG BYG EHS APP
12.00 – 14.00	BREAK	ALL Team
14.00 – 17.00	Document Review and Verification of Previous Non-Conformance Record	• All Team
Thursday, 29 November 2018		
08.00 – 12.00	Field Observation Sentama Lestari (Smallholder) <ul style="list-style-type: none"> Manuring, Spraying, Harvesting, EFB application, best agricultural practices Worker Welfare (payments, complaint mechanism) Hazardous Waste Material (B3) management; Worker facilities (housing, health clinic, clean water, etc), Land Fill, and Land Fire facilities, Storage, ect. Legal operational and Conservation Area Field Observation Cempaka Biru (Smallholder)	<ul style="list-style-type: none"> APP APP EHS EHS

DATE	26 November - 1 December 2018	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
	<ul style="list-style-type: none"> • Manuring, Spraying, Harvesting, EFB application, best agricultural practices • Worker Welfare (payments, complaint mechanism) • Hazardous Waste Material (B3) management; Worker facilities (housing, health clinic, clean water, etc), Land Fill, and Land Fire facilities, Storage, ect. • Legal operational and Conservation Area 	<ul style="list-style-type: none"> • SAP • SAP • BYG
12.00 – 14.00	BREAK	ALL Team
14.00 – 17.00	<ul style="list-style-type: none"> • Field observation clarification • Document Review and Verification of Previous Non-Conformance Record 	<ul style="list-style-type: none"> • ALL Team
Friday, 30 November 2018		
08.00 – 12.00	Document review continuation	ALL Team
12.00 – 14.00	BREAK	ALL Team
14.00 - 15.00	<ul style="list-style-type: none"> • Closing meeting preparation 	<ul style="list-style-type: none"> • All team
15.00 – 17.00	<ul style="list-style-type: none"> • Closing meeting 	<ul style="list-style-type: none"> • All Team
Saturday, 01 December 2018		
07.00 – 15.00	<ul style="list-style-type: none"> • PT Agronusa Investama → Pontianak 	<ul style="list-style-type: none"> • ALL Team
17.45 – 19.15	<ul style="list-style-type: none"> • Pontianak → Jakarta (GA 515) 	<ul style="list-style-type: none"> • ALL Team