

Roundtable on Sustainable Palm Oil Certification R S P O

[✓] Re-Certification

Name of Management : **Bumi Permai Mill – PT Prima Mitrajaya Mandiri & PT Teguh Jayaprima**
 Organisation : **Abadi Subsidiary of MP Evans Group PLC**
 Plantation Name : PT Prima Mitrajaya Mandiri – Beringin Jaya Estate, Lembuswana Estate, Bumi Permai Estate, Prima Estate, Kahoi Estate; PT Teguh Jayaprima Abadi – Rahayu Estate, Mahakam Estate
 Location : Benua Puhun Village, Muara Kaman District, Kutai Kartanegara Regency, Kalimantan Timur Province, Indonesia
 Certificate Code : **MUTU-RSPO/062**
 Date of Initial Registration : 26 June 2014
 Date of Last Issued : 17 September 2019 Date of License Issue : 26 September 2019
 Date of Certificate Expiry : 25 June 2024 Date of License Expiry : 25 June 2020

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
Recertification	13 to 17 May 2019	Trismadi Nurbayuto (Lead Auditor), Brigitta Prita, Haikal Ramadhan, Satria Adi Putra	Ganapathy Ramasamy	Ardiansyah

Assessment	Approved by MUTUAGUNG LESTARI on:
RC	17 September 2019

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 on March 12th, 2014 with registration number **ASI-ACC-055**

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Figure 1. Location Map of PT Prima Mitrajaya Mandiri & Teguh Jayaprima Abadi in Kalimantan Timur Province



Figure 2. Operational Map of Beringin Jaya Estate - PT Prima Mitrajaya Mandiri

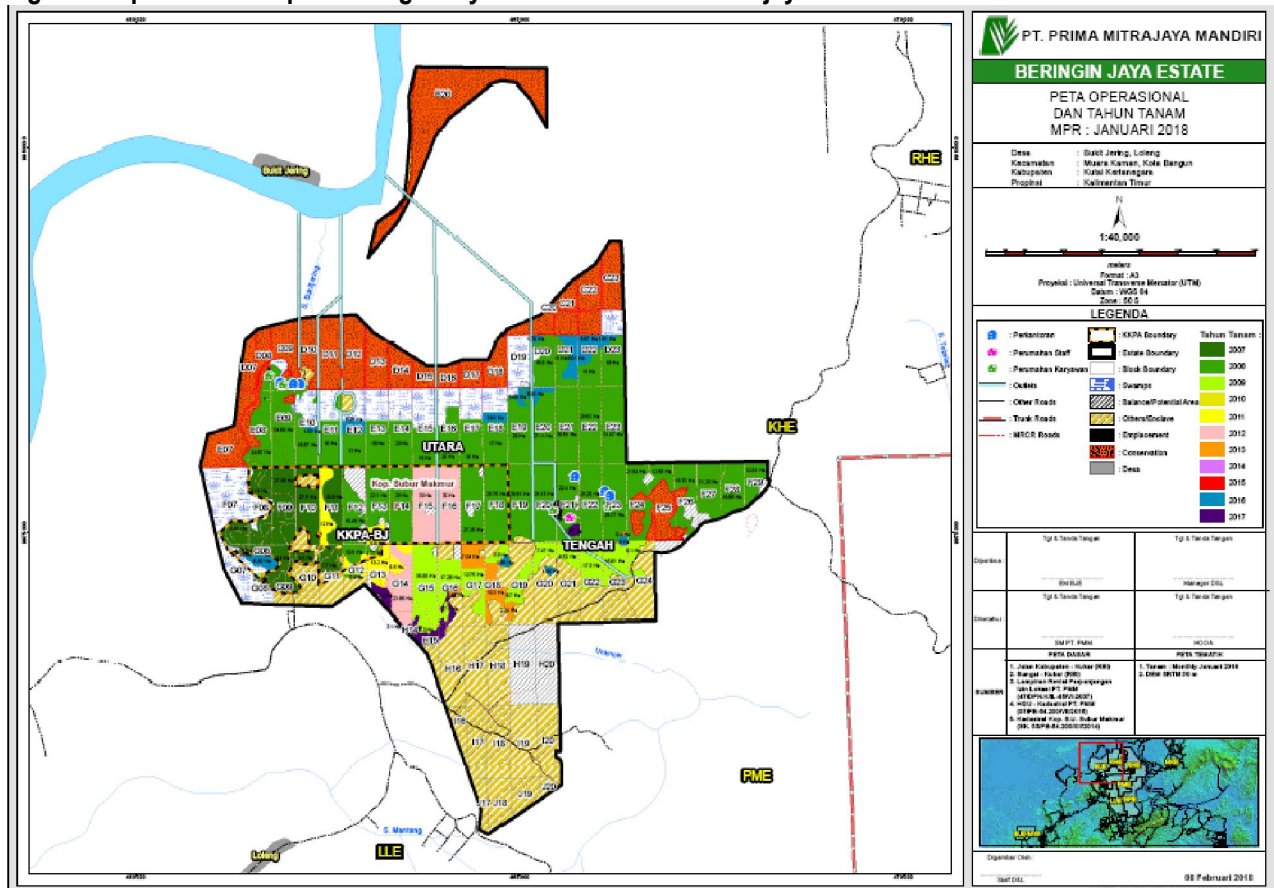


Figure 3. Operational Map of Beringin Jaya Estate, Mawar Division - PT Prima Mitrajaya Mandiri

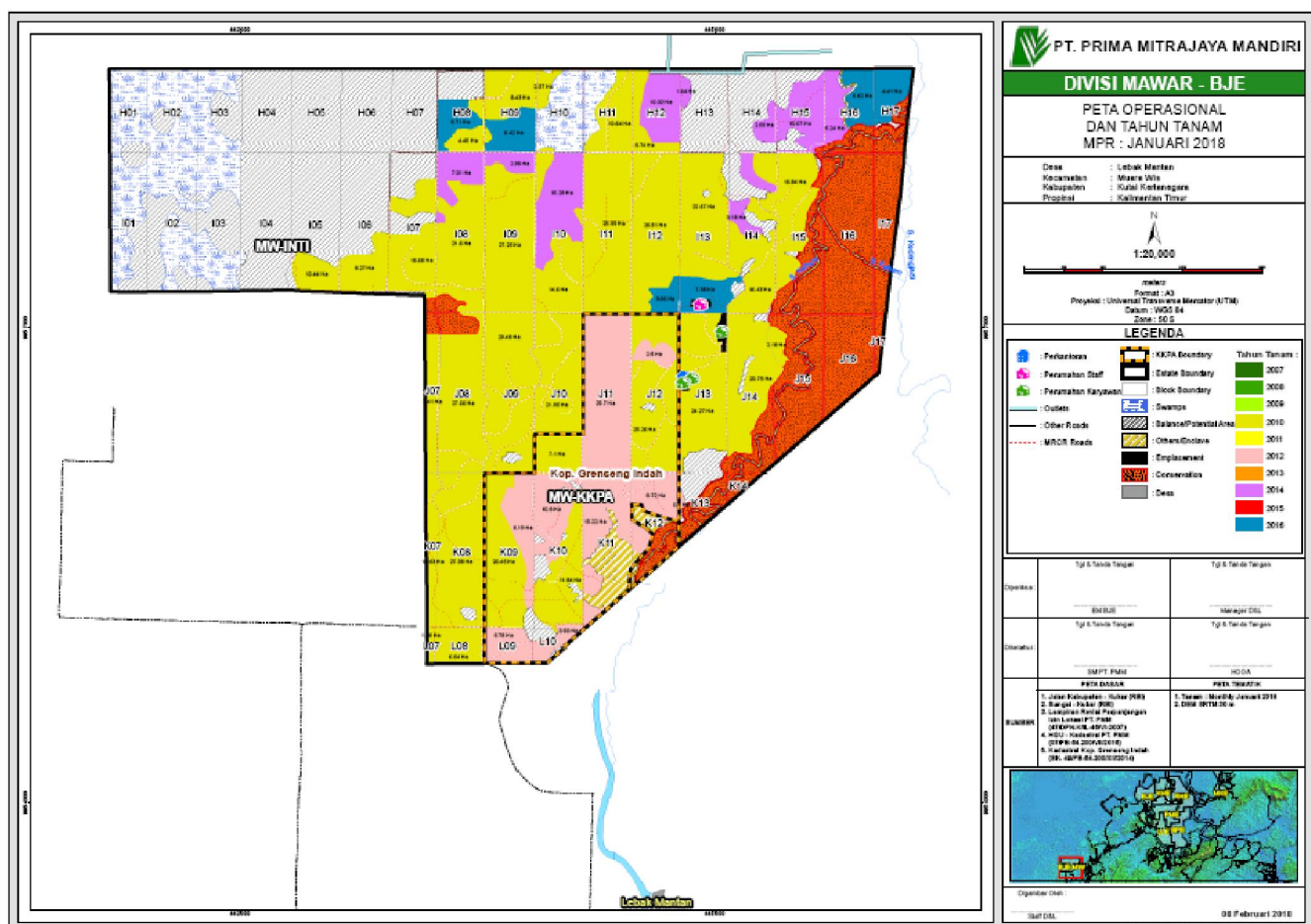


Figure 4. Operational Map of Bumi Permai Estate - PT Prima Mitrajaya Mandiri

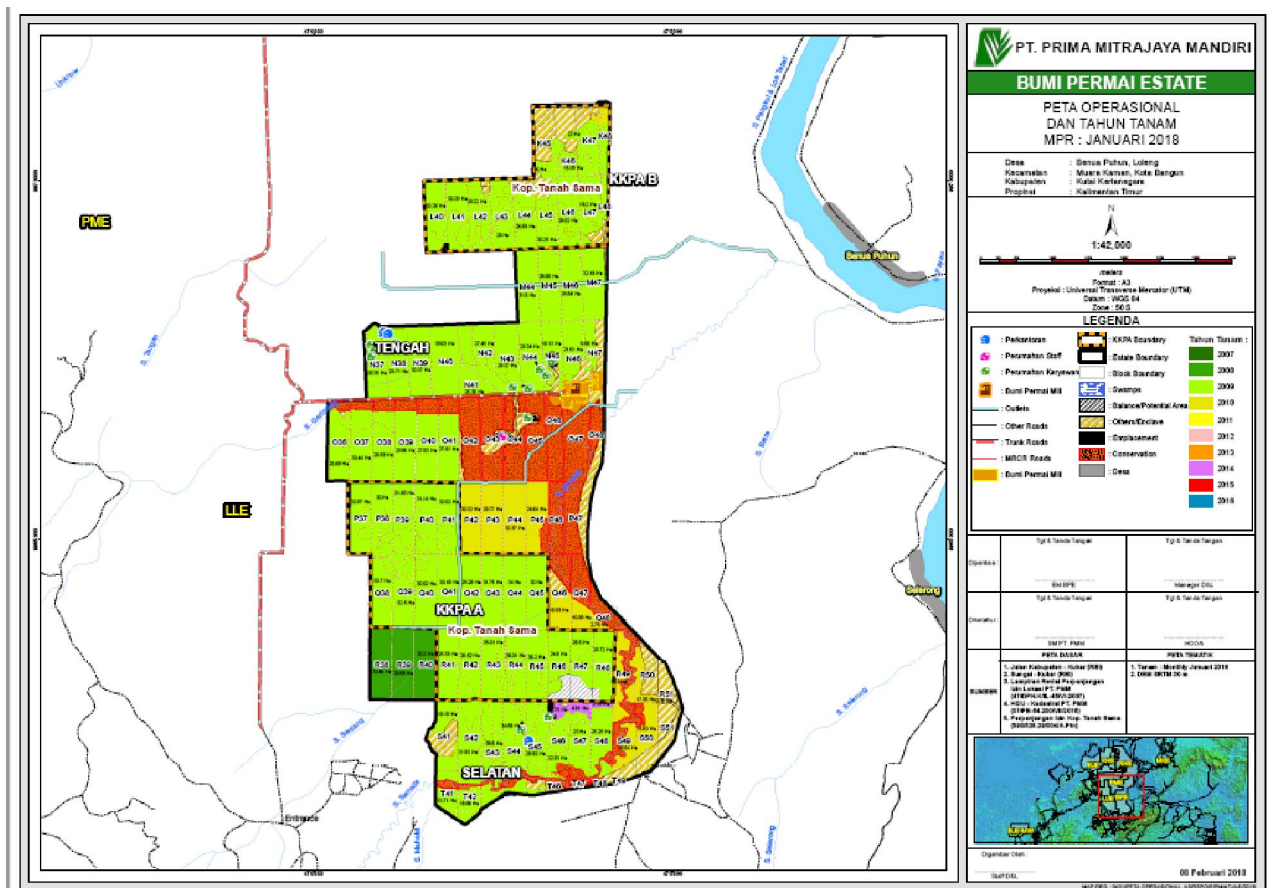


Figure 5. Operational Map of Kahoi Estate - PT Prima Mitrajaya Mandiri

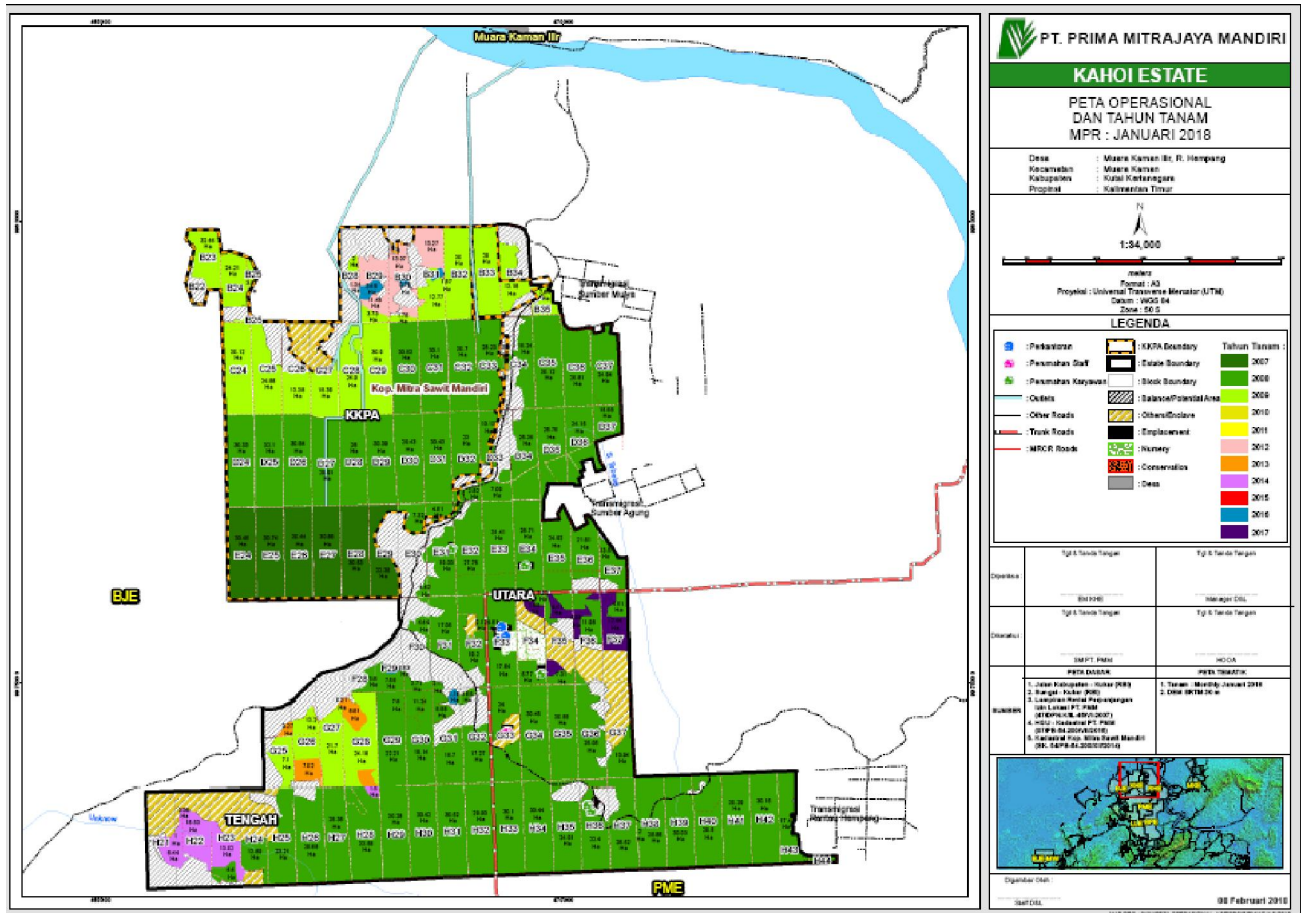


Figure 6. Operational Map of Lembuswana Estate - PT Prima Mitrajaya Mandiri

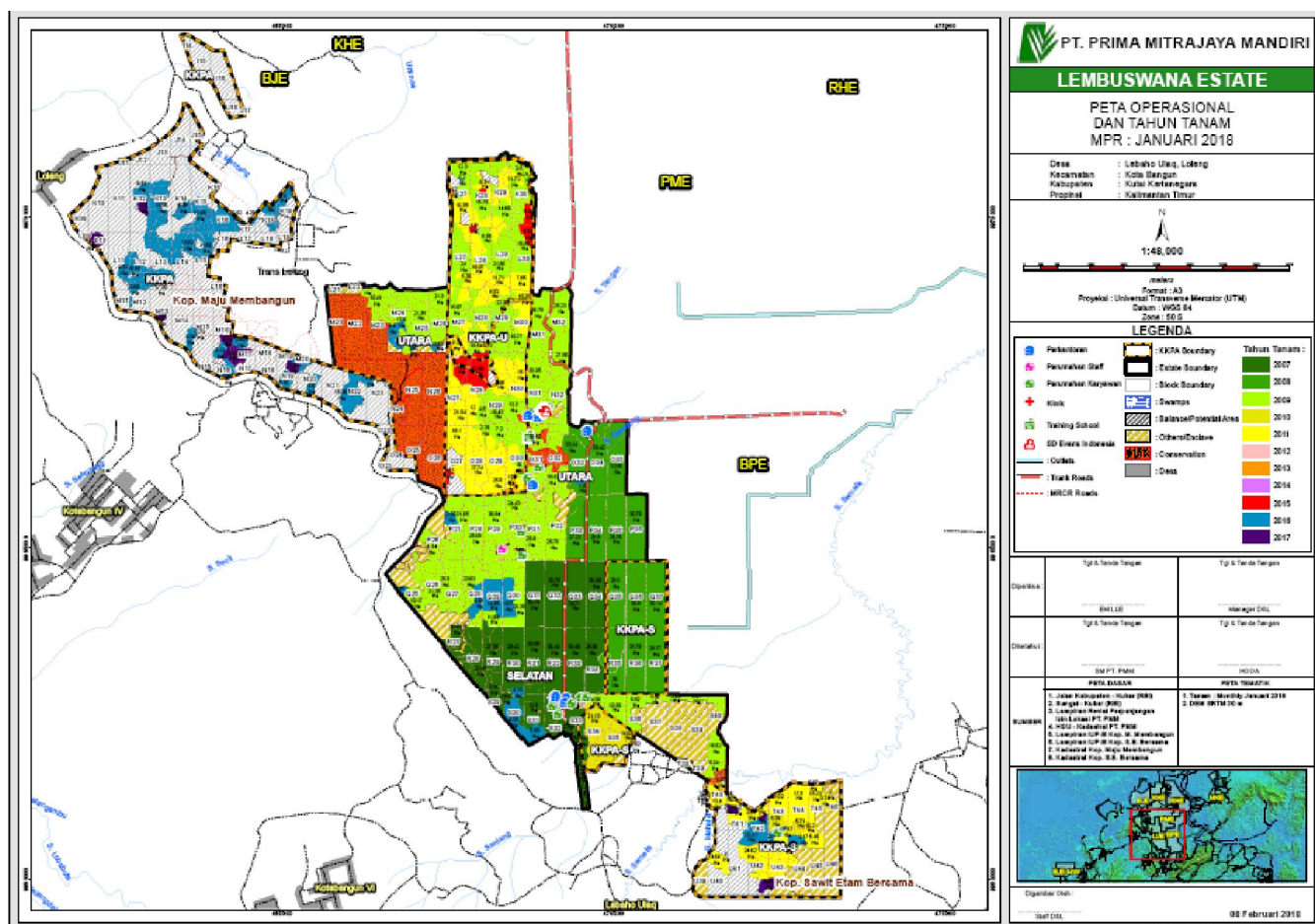


Figure 7. Operational Map of Prima Estate - PT Prima Mitrajaya Mandiri

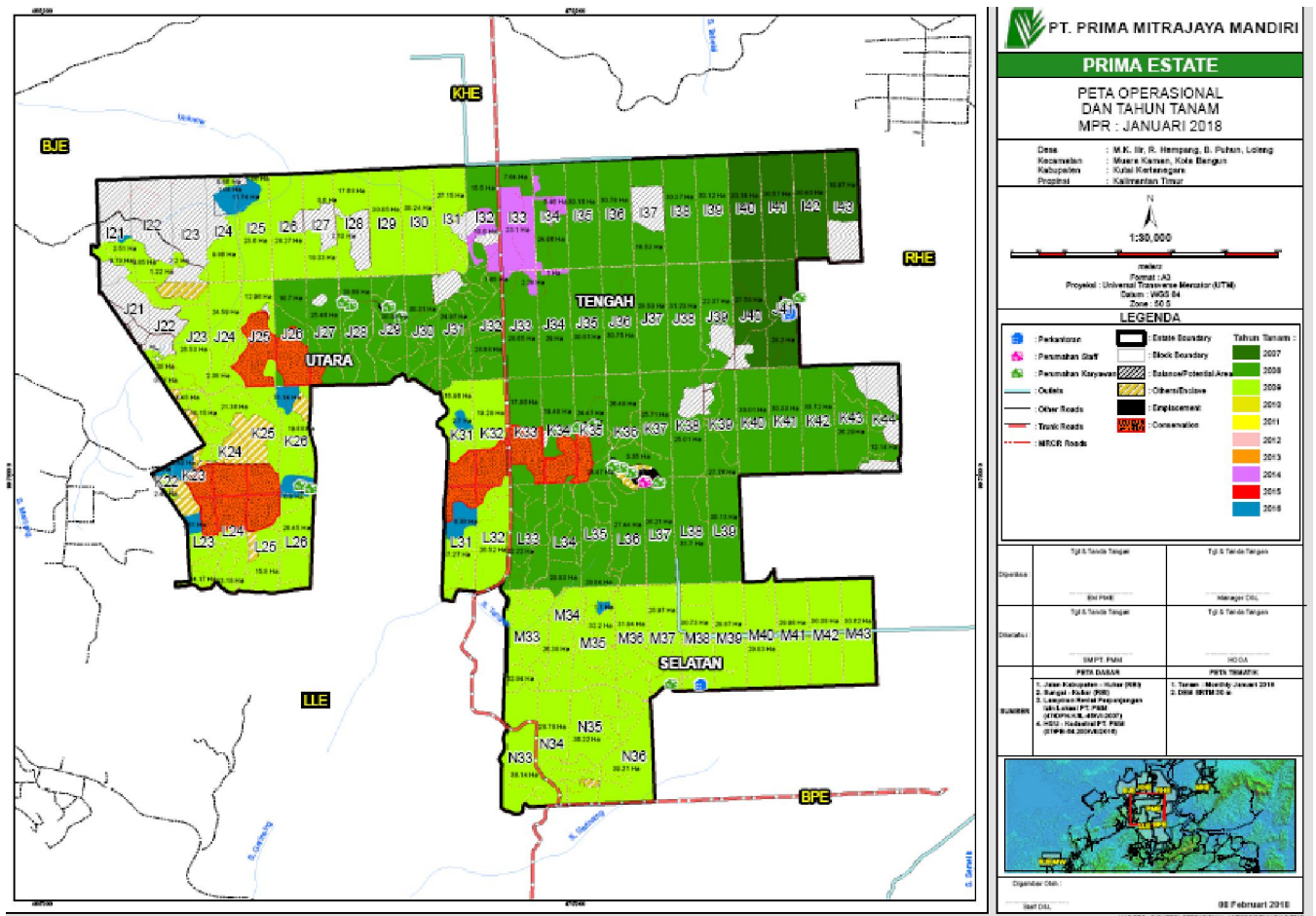


Figure 8. Operational Map of Rahayu Estate - PT Teguh Jayaprima Abadi

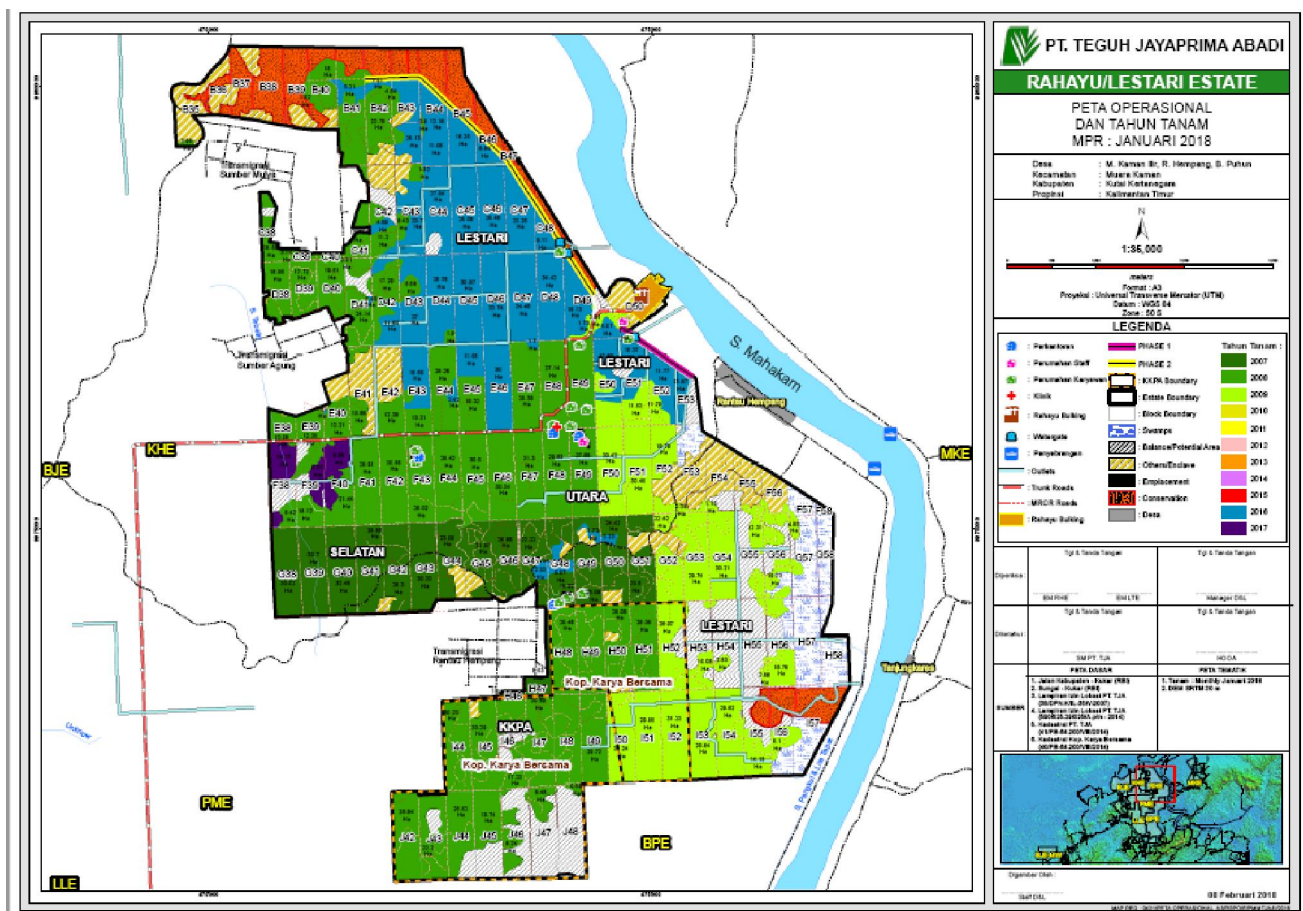
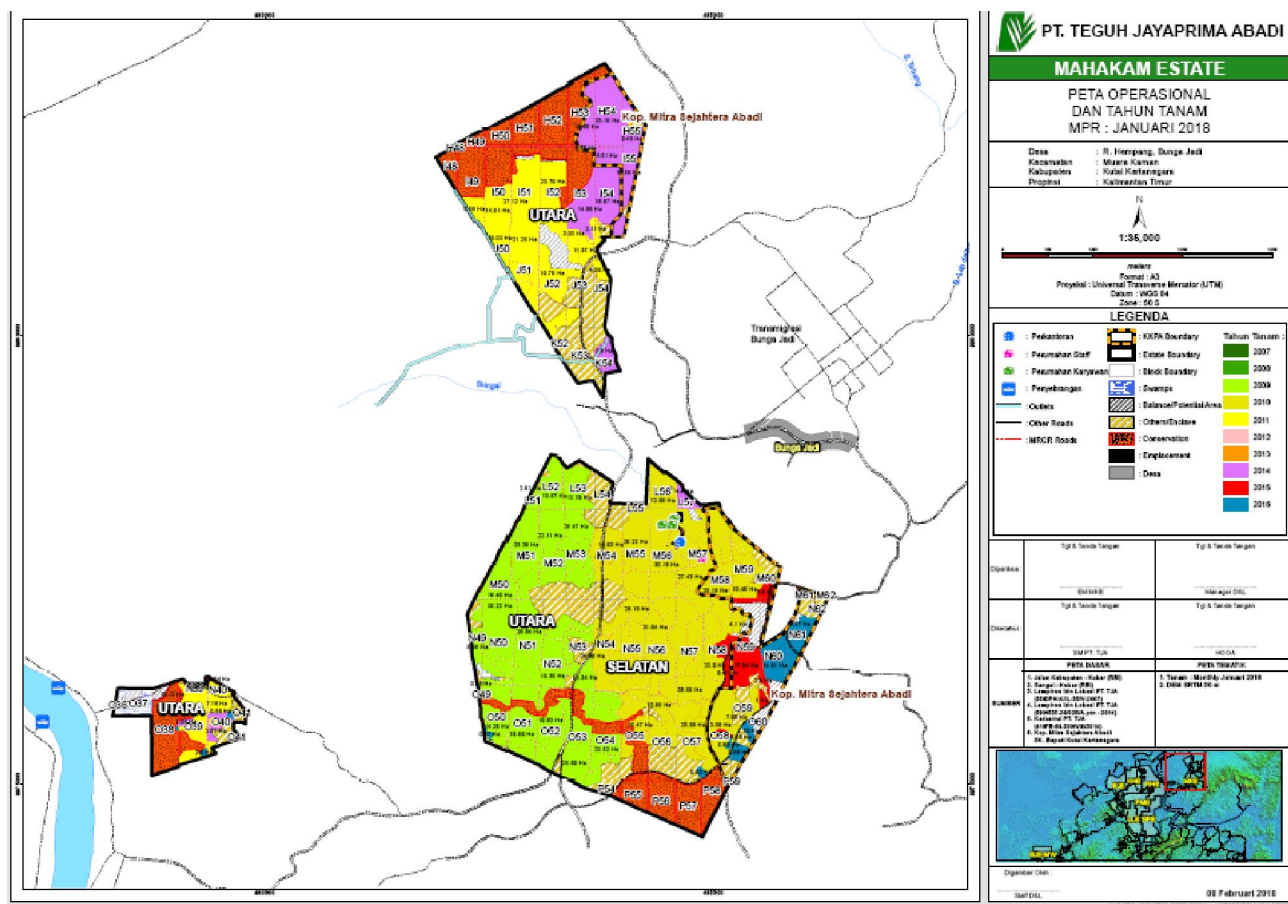


Figure 9. Operational Map of Mahakam Estate - PT Teguh Jayaprima Abadi



Abbreviations Used

ASA	:	Annual Surveillance Assessment
BJE	:	Beringin Jaya Estate
BKSDA	:	<i>Badan Konservasi Sumber Daya Alam</i>
BPE	:	Bumi Permai Estate
BPJS	:	<i>Badan Pelayanan Jaminan Sosial</i>
CH	:	Certificate Holder
CLA	:	<i>Collective Labor Agreement</i>
CPO	:	Crude palm oil
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm Oil
CSR	:	Corporate social responsibility
EFB	:	Empty Fruit Bunch
EIA	:	Environmental Impact Assessment
EHS	:	Environmental Health & Safety
FFB	:	Fresh Fruit Bunch
FGD	:	Forum Group Discussion
FMIS	:	Financial Management Information System
FR	:	Frequency Rate
GCOHS	:	Guiding Committee of Occupational Health & Safety
GHG	:	Green-house Gas
HCV	:	High conservation value
HGU	:	<i>Hak Guna Usaha</i> (Land Use Title)
HRD	:	Human Resources Department
ILO	:	International Labour Organization
ISCC	:	International Sustainability & Carbon Certification
ISPO	:	Indonesian Sustainable Palm Oil
ISO	:	International Standard Organization
IPM	:	Integrated Pest Management
IU	:	Immature Upkeep
KEPMENAKERTRANS	:	<i>Keputusan Menteri Tenaga Kerja & Transmigrasi</i> (Decision of Labor Agency).
KER	:	Kernel Extraction Rate
KHE	:	Kahoi Estate
KSU	:	Koperasi Serba Usaha (<i>Cooperative</i>)
KTP	:	<i>Kartu Tanda Penduduk</i> (ID Card)
KUD	:	<i>Koperasi Unit Desa</i> (Cooperataive of Village)
LD50	:	Lethal Dosage 50
LTA	:	Lost Time Accident
MKE	:	Mahakam Estate
MSDS	:	Material Safety Data Sheet
MU	:	Mature Upkeep
NGO	:	Non Government Organization
NPP	:	New Planting Procedure
LLE	:	Loleng Estate
LSU	:	Leaf Sampling Unit
OER	:	Oil Extraction Rate
OFI	:	Opportunity for Improvement
OHS	:	Occupational Health & Safety
P2K3	:	<i>Panitia Pembina Keselamatan & Kesehatan Kerja</i> (Committee of OHS)
PIC	:	Person In Charge
PK	:	Palm Kernel
PKWT	:	<i>Perjanjian Kerja Waktu Tertentu</i> (<i>Contract workers</i>)

PME	:	Prima Estate
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PPE	:	Personal Protective Equipment
PT KAJ	:	PT Kutai Agro Jaya
PT PMM	:	PT Prima Mitrajaya Mandiri
PT TJA	:	PT Teguh Jayaprima Abadi
RHE	:	Rahayu Estate
RKL-RPL	:	<i>Rencana Kelola Lingkungan – Rencana Pantau Lingkungan</i> (Environmental Management & Monitoring Plan)
RSPO	:	Roundtable on Sustainable Palm Oil
RTE	:	Rare, Threatened, and Endangered
SCCS	:	Supply Chain Certification Standard
SIA	:	Social Impact Assessment
SOP	:	Standard Operation Procedure
SSU	:	Soil Sampling Unit
WTP	:	Water Treatment Plant
WWTP	:	Waste Water Treat Plant

1.0	SCOPE of the CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used	<ul style="list-style-type: none">Indonesian National Interpretation of RSPO P&C 2013 by INANITF (Indonesian National Interpretation Task Force) July 2016, endorsed by the RSPO BoG 30th September 2016.RSPO Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014 revised on 14 June 2017 (Module D / E for CPO Mill).RSPO Certification System for Principles and Criteria, 14 June 2017.	
1.2	Organisation Information		
1.2.1	Organization name listed in the certificate	PT PRIMA MITRAJAYA MANDIRI, PT TEGUH JAYAPRIMA ABADI – MP EVANS GROUP PLC.	
1.2.2	Contact person	Arvind Devadasan	
1.2.3	Organisation address and site address	RSPO registered company: Gedung Graha Aktiva Lt. 10, Jl. HR Rasuna Said Kav. 03 Blok X-1, Kuningan, Jakarta Selatan.	
1.2.4	Telephone	021-52920338	
1.2.5	Fax	021-52920339	
1.2.6	E-mail	arvind@mpevans.co.uk	
1.2.7	Web page address	www.mpevans.co.uk	
1.2.8	Management Representative who completed the application for certification	Sivabalan Subbiah (Head of Operation Agronomy Kaltim)	
1.2.9	Registered as RSPO member	1-0027-06-000-00, October 08 th , 2006.	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	<ul style="list-style-type: none">PT PRIMA MITRAJAYA MANDIRI (Bumi Permai Mill, Beringin Jaya Estate, Kahoi Estate, Lembuswana Estate, Bumi Permai Estate; Prima Estate);PT TEGUH JAYAPRIMA ABADI (Rahayu Estate and Mahakam Estate)	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			LatitudeLongitude
	Bumi Permai Mill	Benua Puhun Village, Muara Kaman Sub-District, Kutai Kartanegara District, Kalimantan Timur Province, Indonesia.	S 00° 17' 45"E 116° 45' 40"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			LatitudeLongitude
	PT PMM		
	Beringin Jaya Estate	Bukit Jering and Lebak Mantan Village, Muara	S 00° 13' 04"E 116° 41' 20"

	Kaman Sub-District, Kutai Kartanegara District, Kalimantan Timur Province, Indonesia		
Kahoi Estate	Muara Kaman Hilir Village, Muara Kaman Sub-District, Kutai Kartanegara District, Kalimantan Timur Province, Indonesia	S 00° 12' 14"	E 116° 42' 54"
Lembuswana Estate	Loleng and Lebaho Ulak Village, Muara Kaman Sub-District, Kutai Kartanegara District, Kalimantan Timur Province, Indonesia	S 00° 15' 50"	E 116° 41' 24"
Bumi Permai Estate	Benua Puhun Village, Muara Kaman Sub-District, Kutai Kartanegara District, Kalimantan Timur Province, Indonesia	S 00° 17' 21"	E 116° 44' 27"
Prima Estate	Loleng Village, Muara Kaman Sub-District, Kutai Kartanegara District, Kalimantan Timur Province, Indonesia	S 00° 16' 15"	E 116° 44' 02"
PT TJA			
Rahayu Estate	Rantau Humpang Village, Muara Kaman Sub-District, Kutai Kartanegara Districts, Kalimantan Timur Province, Indonesia	S 00°13' 01"	E 116° 46' 09"
Mahakam Estate	Bunga Jadi Village, Muara Kaman Sub-District, Kutai Kartanegara District, Kalimantan Timur Province, Indonesia	S 00° 12' 03"	E 116° 52' 03"

1.5	Description of Area Statement		
1.5.1	Tenure		
	• State		20,507.30 Ha
	• Community		Ha
<i>Note: TOTAL HGU + HGB PT PMM: 11,079.10 Ha; HGU on progress: 9,428.20 Ha</i>			

1.5.2	Area Statement			
		PT PMM & PT TJA	Smallholders	Total
	• Total area	15,716.64	4,790.66	20,507.30 Ha
	• Mature area	9,535.19	3,751.00	13,286.19 Ha
	• Immature area	977.23	185.54	1,162.77 Ha
	• Mill & Emplacement	90.30	-	90.30 Ha
	• Reserved area	1,039.14	398.05	1,437.19 Ha
	• Trench	57.45	14.30	71.75 Ha
	• Nursery	8.94	-	8.94 Ha
	• Others area	1,759.83	311.67	2,071.50 Ha
	• High Conservation Area	1,851.09	-	1,851.09 Ha
	• Road	397.47	130.10	527.57 Ha

Data from area statement 2019.

1.6	Planting Year and Cycles					
1.6.1	Age profile of planting year					
	PT PMM					
	Hectarage (Ha)					
	Planting Year	BJE	KHE	LLE	BPE	PME
						Total

	Own Estate	Small holder	Own Estate	Small holder	Own Estate	Small holder	Own Estate	Small holder	Own Estate	
2007	-	137.38	-	175.37	395.17	-	-	-	166.92	874.84
2008	664.49	136.75	1,299.75	408.31	212.52	180.00	91.34	-	1,122.49	4,115.65
2009	134.78	-	82.47	319.42	572.38	264.29	841.39	967.11	972.62	4,154.46
2010	421.64	64.65	-	-	-	-	212.64	-	-	698.93
2011	-	43.50	-	-	-	262.11	-	-	-	305.61
2012	-	168.79	-	40.41	-	-	-	-	-	209.20
2013	21.52	-	-	-	-	-	-	-	-	21.52
2014	57.37	-	-	-	-	-	10.85	-	-	68.22
2015	-	-	-	-	-	42.24	-	-	-	42.24
2016	83.04	-	-	5.88	64.20	-	4.80	-	42.97	200.89
2017	25.93	-	24.78	-	-	-	-	-	-	50.71
Total	1,408.77	551.07	1,407.00	949.39	1,244.27	748.64	1,161.02	967.11	2,305.00	10,742.27

PT TJA

Planting Year	Hectarage (Ha)				
	RHE		MKE		Total
	Own Estate	Smallholder	Own Estate	Smallholder	
2007	378.82	-	-	-	378.82
2008	748.72	394.77	-	-	1,143.49
2009	360.72	122.49	321.82	-	805.03
2010	-	-	319.77	65.65	385.42
2011	-	-	214.74	-	214.74
2012	-	-	-	-	0
2013	-	-	-	-	0
2014	-	-	-	59.98	59.98
2015	-	-	-	39.94	39.94
2016	606.61	-	4.96	33.50	645.07
2017	30.20	-	-	-	30.20
2018	-	-	-	4.00	4.00
Total	2,125.07	517.26	861.29	203.07	3,706.69

1.6.2 New Planting area after January 2010 1,162.77 Ha

1.6.3 Planting Cycle 1st Cycle

1.7 Description of Mill and Supply Base

1.7.1 Description of Mill

Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel	
			Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)

Bumi Permai	60	286,101.08	67,930.98	23.74	14,120.77	4.93
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**Production data source from May 2018 until April 2019.*

1.7.2 Description of Certification Scope of Supply Base

Name		Total Ha	Planted	FFB Production	Yield (tonnes/ha/year)
PT. PRIMA MITRAJAYA MANDIRI					
Beringin Jaya Estate	Own Estate	3,229.08	1,408.77	23,229.92	16.49
	Koperasi Subur Makmur (399 SH)	618.07	551.07	10,718.27	19.44
	Koperasi Grenseng Indah (90 SH)				
Kahoi Estate	Own Estate	1,748.96	1,407.00	30,955.09	22.00
	Koperasi Mitra Sawit Mandiri (1,087 SH)	1,106.97	949.39	17,841.63	18.79
Lembuswana Estate	Own Estate	1,911.95	1,244.27	28,715.65	23.08
	Koperasi Maju Membangun (1,184 SH)	805.85	748.64	19,687.27	26.29
	Koperasi Sawit Etam Bersama (612 SH)				
Bumi Permai Estate	Own Estate	1,750.25	1,161.02	17,817.87	15.35
	Koperasi Tanah Sama (652 SH)	1,365.19	967.11	18,778.82	19.42
Prima Estate	Own Estate	2,772.04	2,305.00	54,808.28	23.78
PT TEGUH JAYAPRIMA ABADI					
Rahayu Estate	Own Estate	2,945.17	2,125.07	23,066.89	15.50
	Koperasi Karya Bersama (815 SH)	658.58	517.26	9,263.72	17.91
Mahakam	Own Estate	1,359.18	861.29	18,669.45	8.79
	Koperasi Mitra Sejahtera Abadi (151 SH)	236.00	203.07	484.19	7.38
TOTAL		20,507.30	15,390.12	274,037.05	16.24

**Production data source from May 2018 until April 2019.*

1.7.3 FFB description from other source

Name of sources/Organisation (RSPO certified / non-certified)	Type of Organisation	Number of smallholders	Supplied to Mill
			FFB (tonnes/year)
Andy K	Independent smallholder (Non-certified RSPO)	-	390.78
Gaharu Estate	(Non-certified RSPO)	-	3,988.22
Jatimas Estate	(Non-certified RSPO)	-	1,334.02
Kulim Estate	(Non-certified RSPO)	-	31.18
Angsana Estate	(Non-certified RSPO)	-	205.61
Trembesi Estate	(Non-certified RSPO)	-	322.64
Rimba Ayu Estate	(Non-certified RSPO)	-	1,421.92
Loleng Non 1	(Non-certified RSPO)	-	105.64
Loleng Non 2	(Non-certified RSPO)	-	141.05
PT Kutai Agro Jaya	Independent Outgrower (Non-certified RSPO)	-	285.08

PT Jaya Mandiri Sukses	Independent Outgrower (Non-certified RSPO)	-	276.99
PT Putra Bongan Jaya	Independent Outgrower (Non-certified RSPO)	-	3,560.90
TOTAL			12,064.03

**Production data source from May 2018 until April 2019.*

1.7.4	Product categories	FFB, CPO, PK
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1.8	Tonnage of Product		
1.8.1	Past Annual Claim Certified Product	Previous Certificate Claim 26 June 2018 to 25 June 2019 (tonnes/year)	Actual certified product 1 May 2018 to 30 April 2019 (tonnes/year)
	• FFB Production	282,750	274,037.05
	• CPO Production	66,363	64,995.51
	• Palm Kernel (PK) Production	13,835	13,546.60

1.8.2	Product selling	
	Tonnage of selling product	Period of actual selling product 1 May 2018 to 30 April 2019 (MT)
	• CSPO sold as RSPO certified product	4,000.48
	• CSPK sold as RSPO certified product	9,017.05
	• CSPO sold under other scheme (ISCC)	29,501.94
	• CSPK sold under other scheme	-
	• CSPO sold as conventional	28,501.68
	• CSPK sold as conventional	904.58

1.8.3	Estimate of Certified FFB Claim
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	Name	Total Ha	Planted	FFB Production	Yield (tones/ha/ year)
PT. Prima Mitrajaya Mandiri					
Beringin Jaya Estate	Own Estate	3,229.08	1,408.77	24,391	17.00
	Koperasi Subur Makmur (399)	618.07	551.07	11,254	20.00
	Koperasi Grenseng Indah (90)				
Kahoi Estate	Own Estate	1,748.96	1,407.00	32,503	23.00
	Koperasi Mitra Sawit Mandiri (1,087)	1,106.97	949.39	18,734	20.00
Lembuswan a Estate	Own Estate	1,911.95	1,244.27	30,151	24.00
	Koperasi Maju Membangun (1,184)	805.85	748.64	20,672	28.00
	Koperasi Sawit Etam Bersama (612)				
Bumi Permai Estate	Own Estate	1,750.25	1,161.02	18,709	16.00
	Koperasi Tanah Sama (652)	1,365.19	967.11	19,718	20.00
Prima Estate	Own Estate	2,772.04	2,305.00	57,549	25.00
PT Teguh Jayaprima Abadi					
Rahayu Estate	Own Estate	2,945.17	2,125.07	24,220	16.00
	Koperasi Karya Bersama (815)	658.58	517.26	9,727	19.00
Mahakam	Own Estate	1,359.18	861.29	19,603	9.00

		Koperasi Mitra Sejahtera Abadi (151)	236.00	203.07	508	8.00		
	Total Own Estate		15,716.64	10,512.42	207,126	20.00		
	Total Smallholders		4,790.66	3,936.54	80,613	20.00		
	Total		20,507.30	14,448.96	287,739	20.00		
<i>*Projected FFB production for 26 June 2019 to 25 June 2020</i>								
1.8.4	Estimate of Certified Palm Product Claim							
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel	Supply Chain Module	
				Out put (tonnes)	Extraction (%)	Out put (tonnes)		Extraction (%)
	Bumi Permai	60	287,739	68,280	23.73	14,387	5.00	MB
<i>*Projected CSPO and CSPK production for 26 June 2019 to 25 June 2020</i>								
1.9	Other Certifications							
	ISCC			EU-ISCC-CERT-DE119-62175724 (by ASG CERT)				
	Others			ISPO				
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						
	Pangkatan	2012	Pangkatan Estate (PT. Pangkatan Indonesia)	2012	Labuhanbatu, North Sumatera	Certified		
			Sennah Estate (PT. Sembada Sennah Maju)	2012	Labuhanbatu, North Sumatera	Certified		
			Bilah Estate (PT. Bilah Plantindo)	2012	Labuhanbatu, North Sumatera	Certified		
			Pangkatan Palm Oil Mill	2012	Labuhanbatu, North Sumatera	Certified		
	Bumi Permai	2013	Bumi Permai Palm Oil Mill	2013	East Kutai, East Kalimantan	Certified		
			PT. Prima Mitrajaya Mandiri	2013	East Kutai, East Kalimantan	Certified		
			Koperasi Subur Makmur	2013	East Kutai, East Kalimantan	Certified		
			Koperasi Sawit Etam Bersama	2013	East Kutai, East Kalimantan	Certified		
			Koperasi Tanah Sama	2013	East Kutai, East Kalimantan	Certified		
			Koperasi Mitra Sawit Mandiri	2013	East Kutai, East Kalimantan	Certified		
			Koperasi Grenseng Indah	2013	East Kutai, East Kalimantan	Certified		
			Koperasi Maju Membangun	2013	East Kutai, East Kalimantan	Certified		

		Koperasi Sawit Etam Bersama – Tahap II	2019	East Kutai, East Kalimantan	Non-Certified
		Koperasi Maju Membangun – Tahap II	2019	East Kutai, East Kalimantan	Non-Certified
		Koperasi Tanah Sama – Tahap II	2019	East Kutai, East Kalimantan	Non-Certified
	2023	PT Bumi Mas Agro	2023	Kalimantan	Non-Certified
		Koperasi Dugai Jaya Mandiri	2023	Kalimantan	Non-Certified
		Koperasi Maruangan Sejahtera Mandiri	2023	Kalimantan	Non-Certified
		Koperasi Jaya Harapan Bersama	2023	Kalimantan	Non-Certified
Rantau Hempang	2019	PT. Teguh Jayaprima Abadi	2013	East Kutai, East Kalimantan	Certified
		Koperasi Karya Bersama	2013	East Kutai, East Kalimantan	Certified
		Koperasi Mitra Sejahtera Abadi	2013	East Kutai, East Kalimantan	Certified
		Rantau Hempang Palm Oil Mill	2019	East Kutai, East Kalimantan	Non-certified
Tengkalat	2017	PT. Gunung Pelawan Lestari	2017	Bangka	Certified
		Tengkalat Palm Oil Mill	2017	Bangka	Certified
		Koperasi Ikhtiar Sejahtera	2017	Bangka	Certified
		Koperasi Silip Lestari	2017	Bangka	Certified
		Koperasi Mapur Mandiri	2017	Bangka	Certified
		Koperasi Gunung Muda Sejahtera	2017	Bangka	Certified
-		PT Evans Lestari	2023	Musirawas, South Sumatera	Currently FFB delivered to outside mill
-		PT Simpang Kiri Plantation Indonesia	2023	Aceh	Currently FFB delivered to outside mill
1.10.2	Progress of Associated Smallholders and Outgrowers for Certifiable Standard				
	Smallholder under PT PMM (Koperasi Sawit Etam Bersama – Tahap II, Koperasi Maju Membangun – Tahap II, Koperasi Tanah Sama – Tahap II) currently is in progress of land use title issuance.				

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
RC	<p>1. Trismadi Nurbayuto (Lead Auditor). Indonesian Citizen. Diploma of Forest Management from Forestry Faculty; Associate Degree of Economic from Economic and Management. He has experienced as field assistant on oil palm plantation year of 2008. Therefore he has experienced as HCV and SEIA Assessor on 2010-2013. He has been followed HCV identification and management training; ISO training (9001;14001; 22000); ISPO Lead Auditor's training; Safety Expert; RSPO Lead Auditor's; OHS Auditors by Government Regulation No 50 year of 2012; and RSPO Next. He has been conducted audit on ISPO and RSPO scheme since year of 2013 as an Auditor on several aspect as environment, OHS, Legality, Best Management Practices, Social, Worker Welfare, Conflict Resolutions, Long term Business Plan and Supply Chain on Palm Oil Mill. During this assessment verified Environment, GHG and HCV.</p> <p>2. Brigitta Prita (Auditor). Citizen of Indonesia. Bachelor of Forestry, Department of Forest Resources Conservation and Ecotourism. She had attended Training ISPO by Commission ISPO on June 2013, Training ISO 9001:2008 Quality Management System on January 2014, In House Training 17021 and 17065 management system and Product Quality, Training High Conservation Value by IPB on September 2015, In House Training HCV on August 2016, In House Training Roundtable Sustainable Palm Oil on January 2014; In House Training ISO 14000:2004 Environmental Management System. She has been audit experience ISPO & RSPO since April 2013 in the environmental, conservation, waste management and worker welfare aspects. During this assessment verified Legal, Social, SCCS, Partial Certification and Time Bound Plan.</p> <p>3. Haikal Ramadhan Kharismansyah (Auditor). Indonesian citizen, Bachelor of Agriculture department of plant and pest disease (Agrotechnology). He has 3 years experience as an Agronomy Staff in private oil palm plantation in Indonesia. Training which had attended including Basic Management Development Program Agronomy, Integrated Urban Pest Management, Integrated Pest Management, ISO 9001 : 2015, Auditor ISPO, RSPO awareness, OHSAS 18001, ISO 22000 awareness. Did some audit ISPO scheme with aspects Best management practices. During this assessment, He verified related Best Management Practices, Transparencies and Long Term Business Plan.</p> <p>4. Satria Adi Putra (Auditor). Indonesian citizen, Diploma III majoring in Palm Oil Plantation. Have experience of work more than six years since 2009 as the operational staff of private oil palm plantations in Indonesia. Training have been followed including Occupational Health and Safety Expert, Orang Utan and Wildlife Management, ISPO Auditor Training, RSPO Awareness, IHT Potential Mapping and Conflict Resolution in Production Forests, OHSAS 18001, SA 8000, RSPO Lead Training, Lead Auditor Training for ISO 9001, ISO 14001, ISO 17021, ISO 17065, ISO 19011, ISO 22000. During this audit, he verify related OHS and Worker Welfare.</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 auditor</p> <p>Number of days for RC at site: 5 days</p> <p>Number of working days for RC at site : 20 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 the PT Prima Mitrajaya Mandiri and PT Teguh Jayaprima Abadi (MP Evans Group PLC) to the requirements of <i>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 June 2017 (Module E for CPO Mill)</i>.</p> <p>The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) interview, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site.</p>

Some opportunities for improvement of the results Recertification delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase (ASA-1.1).

Improvement of findings from surveillance assessment findings were observed by auditors at this RC assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of RC.

Based on the results of the assessment at the time of Recertification it was found that there was disagreement with the results of the audit conclusions.

The assessment program please find Appendix 2

2.2.3 Locations of Assessment

RC Number of units in this certification activity is seven (7) estates, which supply the raw material (FFB) to one (1) palm oil mill. In conducting the assessment, the team of auditors used the $0.8\sqrt{y} \cdot z$ 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 one (1) palm oil mill (**Bumi Permai Mill**) and two (3) estates (**Prima Estate, Kahoi Estate and Mahakam Estate**).

Rahayu Bulking

- **Security Post**, Observation & interview regarding activities, work hours, and FFB acceptance process.
- **Weighbridge**, Observation and interview regarding CPO & PK.
- **Harbor**, Observation regarding condition of harbor for shipment CPO & PK.

Bumi Permai Mill

- **Sterilizer**. Observation and interviews with operators regarding work licenses, training and work systems
- **Engine Room**. Observation and interviews with operators regarding work licenses and understanding of emergency response conditions
- **Press**. Observation and interviews with operators regarding day-to-day work responsibilities, PPE, and medical check-up
- **Boiler**. Observation and interviews with operators regarding work licenses and health medical check-up
- **Kernel**. Observations and interviews with workers regarding work time, PPE, and knowledge of emergency response conditions
- **Security Post**, Observation & interview regarding activities, work hours, and FFB acceptance process.
- **Grading station**. Observation and interview regarding grading activities.
- **Weighbridge**, Observation and interview regarding CPO & PK.
- **Biogas Plant**. Observations and interviews with Staff related to POME utilization as a renewable energy source, and as part of GHG mitigation.
- **Effluent Pond**. Based on field observation to the effluent ponds sighted that there are no waste water leakage.
- **Composting EFB**. Observation related utilization of EFB and POME for the composting process and the prevention of environmental pollution potential. Based on field observation result sighted there are no waste water leakage.
- **Control Well Number 2**. Near of composting area. There is water on the well.
- **Control Well Number 3**. Non land application block N44, Bumi Permai Estate. There is water on the well.
- **Control Well Number 4**. Land application block N41, Bumi Permai Estate. There is water on the well.
- **Land application, Block N41, Bumi Permai Estate**. Based on interview with effluent operator sighted that there are 183 flatbed.
- **Chemical storage**. Observation and interview related management of chemical.
- **PPE storage**. Observation and interview related management of PPE and Stock.
- **Temporary Hazardous Storage**. Observation and interviews related to hazardous waste management, OHS implementation, employment and complaint mechanism.
- **Central warehouse**. Observation and interview related management in central warehouse.

- **Workshop.** Observation and interview related activities in workshop.

Prima Estate

- **Block L39. Water Stick.** Observation regarding peat water level
- **Block M41. Subsidence Pole.** Observation about tools and how to measure peat subsidence
- **Block M42. Piezo Meter.** Observation regarding recording equipment for peat water level
- **Block F37.** Interview with spray and fertilizer workers. Interviews about understanding and implementing procedures, how to work safely, and handling chemicals
- **Block J40. Harvesting.** Observation and interviews regarding implementation of harvesting, wage, and FFB criteria
- **Block K34/K35, Central Division, HCV area.** Based on field observation there are signboard which inform about area, HCV information and RTE species.
- **Block L34/M34, Tangan River.** Actually on the field only trench with a width 3 meter, the condition is no water.
- **Boundary stones PMM 141B, PMM 142B, Block L37, South Division.** It adjacent with cadastral area, all boundary on good condition and maintained.
- **Daycare.** Observation and interview with babysitter related activities in daycare.
- **Chemical storage.** Observation and interview related management of chemical.
- **PPE storage.** Observation and interview related management of PPE and Stock.
- **Temporary Hazardous Storage.** Observation and interviews related to hazardous waste management, OHS implementation, employment and complaint mechanism.
- **Fertilizer storage.** Observation and interview related management of fertilizer.
- **Central warehouse.** Observation and interview related management in central warehouse.

Kahoi Estate

- **Block F33. Manuring.** Observation and interviews regarding implementation of fertilization procedures, health checks, and handling of fertilizer waste
- **Block C33. Harvesting.** Observation and interviews regarding implementation of harvesting, wage, and FFB criteria
- **Block H37. Water Stick.** Observation regarding peat water level
- **Block E24. Piezometer and Subsidence Pole.** Observe the means of recording peat water level, tools and how to measure peat subsidence
- **Block C25. Lighthouse.** Observation regarding the condition and completeness of infrastructure facilities for monitoring land fires
- **Boundary stone PMM 119B, Block C37, North Division.** It adjacent with cadastral area, all boundary on good condition and maintained.
- **Block D37, North Division, Tebelai River (Based on EIA name is Muara Kaman Tua River).** Actually on the field only trench with a width 3 meter, the condition is no water.
- **Block C25, North Division, Unknown River (Based on EIA name is Bukit Jering River).** Swamp area, where the river body is invisible and submerged in water.
- **Boundary Stones PLM KH035, Block C33, KKPA Division (Mitra Sawit Mandiri Cooperative).** It adjacent with fruit plantation of Muara Kaman Village.
- **Landfill block F32.** Observation related management of domestic waste.
- **Daycare.** Observation and interview with babysitter related activities in daycare.
- **Chemical storage.** Observation and interview related management of chemical.
- **PPE storage.** Observation and interview related management of PPE and Stock.
- **Temporary Hazardous Storage.** Observation and interviews related to hazardous waste management, OHS implementation, employment and complaint mechanism.
- **Fertilizer storage.** Observation and interview related management of fertilizer.
- **Central warehouse.** Observation and interview related management in central warehouse.
- **Policlinic.** Observation and interview related management of medical waste, and activities in clinic.

- **Fire Fighter Store & Hydrant Simulation.** To observe readiness of emergency facility in Kahoi Estate.

Mahakam Estate

- **Block M58 & M59. Division KKPA. Interview with spray and fertilizer workers.** Interviews about understanding and implementing procedures, how to work safely, and handling chemicals
- **Block M55. Divisi Selatan. Harvesting.** Observation and interviews regarding implementation of harvesting, wage, and FFB criteria
- **Block I52. Subsidence Pole.** Observation about tools and how to measure peat subsidence
- **Block I51. Piezometer.** Observation regarding recording equipment for peat water level
- **Block J51. Water Stick.** Observation regarding peat water level
- **HCV area (HCV3, HCV4.1; HCV4.3), Block I50-I58, North Division.** Based on field observation there are signboard which inform about area, HCV information and RTE species.
- **Paseban River, Block O50-O55, South Division.** There are information signboard, chemical application prohibition.
- **HCV area, Block P57-P58, South Division.** It adjacent with Bunga Jadi Village, based on field observation sighted that good vegetation.
- **Block I50. All PT TJA area doesn't have HGU,** however there are trench barrier between cadastral area with outside area.
- **Daycare.** Observation and interview with babysitter related activities in daycare.
- **Chemical storage.** Observation and interview related management of chemical.
- **PPE storage.** Observation and interview related management of PPE and Stock.
- **Fertilizer storage.** Observation and interview related management of fertilizer.
- **Harvesting.** Observation and interview with Foreman and 3 Harvesters team towards technical, manpower, OHS, environment and conservation aspects.

Stakeholder

- **Labour and Transmigration Agency, Kutai Kertanegara District.** Interviews related to Occupational Safety and Health, Employment and Industrial Relations.
- **Plantation Agency, Kutai Kertanegara District.** Interviews related to the assessment of plantation business; Owned business license (capacity and area of the estate), partnership with the community, corporate obligations of existing business licenses, peatland management, regional status, land use change, overlapping areas, land fires, etc.
- **Environment Agency.** Interview related environment aspect, periodic test (environment), environment issue and environment report to the agency.
- **Loleng Village** Interview the head of village and community representation related to social interaction between company and community surround, and another social issues.
- **Head, Secretary, and Exchequer Cooperative Building Maju Jaya.** Interview related empowering local communities, payment and contractor employee insurance.
- **Head & Secretary Mitra Sawit Mandiri Cooperative.** Interview related empowering local communities, payment and contractor employee insurance.
- **Chairman of KSU Supervisor Mitra Sejahtera Abadi.** Interview related empowering local communities, payment and contractor employee insurance.
- **Bipartite of PT TJA & PT PMM.** Interview related relation between bipartite and company, worker issue and etc.

2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
RC	Summary of stakeholder consultation process Consultation of stakeholders for PT PMM & PT TJA was held by: 1. Public announcement at web www.mutucertification.com on 8 th April 2019

	<p>(https://mutucertification.com/notification-of-rspo-re-certification-of-bumi-permai-pom-pt-prima-mitra-jaya-mandiri-subsiary-of-mp-evans-group-plc/)</p> <ol style="list-style-type: none"> Public consultation by phone with government agencies in Kutai Kartanegara Regency (Labor Agency, Environmental Agency and Plantation Agency) on 17th May 2019. Public consultation by interview with locals of the nearby village (Loleng Village, Bunga Jadi & Muara Kaman Ilir Village), KUD and local contractor on 14-15th May 2019. Consultation meeting and interview with Internal Stakeholder (Bipartite cooperation and gender committee) on 16-17th May 2019. Consultation with NGO via email on 2th May 2019. <p>Numbers of input from stakeholders were clarified by PT Prima Mitrajaya Mandiri & PT Teguh Jayaprima Abadi</p>
2.3.2	Stakeholder contacted
	<i>Please find appendix 1</i>
2.4	Determining Next Assessment
	The next visit (ASA-1.1) will be determined 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 Bumi Permai Mill – PT Prima Mitrajaya Mandiri & PT Teguh Jayaprima Abadi, MP EVANS GROUP PLC operation consisting of one (1) mill and seven (7) oil palm estates.

During the assessment, there were *four (4)* Nonconformities were assigned against Major Compliance Indicators; *three (3)* nonconformities were assigned against Minor Compliance Indicators; and one (1) nonconformance against supply chain requirement for CPO mill and *three (3)* opportunities for improvement were identified.

Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5. The company has already prepared and implemented the corrective action(s) that had been reviewed and accepted by Auditors in form of documentation evidences e.g. *document record/photographic/etc.* Those corrective actions taken that consist of *five (5)* Major non-conformities and *three (3)* Minor non-conformities had been closed out shall be verified during next assessment.

MUTUAGUNG LESTARI found that *Bumi Permai POM* – PT. Prima Mitrajaya Mandiri & PT Teguh Jayaprima Mandiri, *M.P. Evans Group PLC* complied with the requirements of RSPO Principles & Criteria and National Interpretation, RSPO Principles and Criteria (P&C) for Sustainable Palm Oil Production, Republic of Indonesia - RSPO INA-NIWG, 30 September 2016. RSPO Supply Chain Certification Standard and System For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014, Revised on June 2017 (Module D for CPO Mill)

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

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
PRINCIPLE #1 COMMITMENT TO TRANSPARENCY		
1.1	Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	
1.1.1	<p>The company has shown a list of stakeholders PT Prima Mitrajaya Mandiri (PT PMM) and PT Teguh Jayamitra Abadi (PT TJA) listed in the documents REC / 1.0 / PMM / 15/2. The stakeholder list is equipped with name, position, contact number and address.</p> <p>The list of stakeholders of the company consists of 8 Villages represented by the Village Head, 7 Indigenous Peoples, 8 Cooperatives represented by the Chairperson, 3 Hospitals and Health Centres, 6 Departments and Government Agencies, 4 companies around the plantation, 23 suppliers, 8 Contractors and 3 <i>Kapolsek</i> and 2 <i>Danramil</i> from Muara Kaman District, Kota Bangun and Muara Wis. The stakeholder list will be update every year or if there are an updating related position or addition information.</p> <p>Based on interview with stakeholder (Villager, Environment Agency, Manpower Agency and etc), its know that the stakeholder already know related type of information available by public.</p>	
1.1.2	<p>The company has shown procedures regarding information responses listed in SOP No. PMM / SOP / General-02 (Revision 1) dated September 16, 2013 concerning Information Transparency, procedures are prepared with the aim of creating good and harmonious communication between the company and the community. Responses to information</p>	

requests were made 2 weeks after the letter was received.

Regarding confidential information, the provision of information is considered based on the level of confidentiality and must first be discussed and obtain approval from the leadership of the company that is composed of Head of Administration, Manager and Group Manager. If the location management is hesitant to provide information, it will be further discussed with the Head Office HRD. Any communication or agreement made may not conflict with the company's principles and conditions.

The company shows incoming letter request documents and response letters to stakeholders for the period 2018-2019 (until the audit takes place). The information request record is dominated by requests for assistance. The letter has been responded to in accordance with the procedure, namely two weeks after the letter was received. The company considers using all fire prevention and response reporting formats in accordance with Permentan No. 5 of 2018. **OFI**

Status: Comply

1.2

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

1.2.1

Management has List of transparent and confidential documents for public is recorded in Appendix of Transparency Documents dated 2 January 2016. Types of document which is available to the public such as documents are company policies, job description, SOP's, HCV assessment and management plan, GHG monitoring, hazardous materials monitoring, CSR, Guiding Committee of Occupational Safety & Health, list of stakeholder, internal and external complaints, list of employee, company organization chart, OHS Guiding Committee structure, employee agreement. The document can be provided with the record not abused and in accordance with its designation. Based on communities in village head of Loleng, Bunga Jadi and Muara Kaman Ilir sighted information that the company has socialized about public document accessed.

Status: Comply

1.3

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

1.3.1

Policy on integrity and ethical behavior in all operational implementation and transactions is recorded document of Anti-bribery and corruption code of conduct dated 29 July 2013. The document which is available in *bahasa*, explains fair conduct of business, prohibits any employee for corruption, and bribery and provide information in accordance with applicable laws. Based on interview with workers, bipartite cooperation, representatives of gender committees, village head of Loleng, Bunga Jadi and Muara Kaman Ilir, board of smallholder cooperatives, as well as local contractor, already known about code of integrity and ethical behavior.

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

Legalities.

Available Decree of the Regent of Kutai Kartanegara Number: 503/002 / IUP-P / SK-BUN / XI / 2011 November 8th, 2011 concerning Processing Permit (IUP-P) on behalf of PT Prima Mitrajaya Mandiri with a capacity of 60 tons TBS / hour.

- Compliance with Law No.39 year 2014 related plantation.
- Regulation Agriculture Minister Number 98 year 2013 and others.

Best Management Practices

Using the type of pesticide listed and the distribution permit is still valid in accordance with regulations.

Environment Aspect

The company has complied with several environment legal, for example:

- Land Application License No.660.1/002/B.II.1/SK-LA/BLHD/III/2014 dated 7 March 2014, there is no time limit for the license.
- EIA of PT PMM Estate No KAKK/27/AMDAL/KELAPA SAWIT/ 2008 dated 24 September 2008.
- EIA of PT PMM Mill No KAKK/33/ANDAL/PABRIK, TANGKI and DERMAGA KHUSUS/XII/2010 dated 13 December 2010.
- Hazardous waste store License PT PMM Kahoi Estate No P-660.4/038/DPMPTSP/III.3-1/TPSLB3/03/2019 dated 26 March 2019.
- Hazardous waste store License PT TJA Mahakam Estate No P-660.4/036/DPMPTSP/III.3-1/TPSLB3/03/2019 dated 26 March 2019.

OHS

- The company also carried out health checks for mill and estate employees on 2018. Medical checks include checking cholinesterase, audiometry and spirometry.
- Safety Act no. 1 of 1970 Article 3, such as by monitoring the implementation of occupational safety and health, conducting accident investigations, hazard risk analysis, medical check-up, machine operation by persons authorized and socialized safe work practices.
- Boiler operators have licenses to operate boilers in accordance with Minister of Manpower Regulation No. 1 of 1988.
- Technical standard related disturbance of immovable source such as noising, vibration and odor accordance with Minister Decision of Environment number 48/1996, number 49/1996 and 50/1996.

Evidence observed :

Based on document verification, it is known that:

- In Kahoi Estate there are 102 *PKWT* workers. There is no evidence that the *PKWT* workers have been registered with the Department of Manpower and Transmigration of Kutai Kertanegara Regency.
- In Prima Estate there are 71 *PKWT* workers. There is no evidence that the *PKWT* workers have been registered with the Department of Manpower and Transmigration of Kutai Kertanegara Regency.
- At Bumi Permai Mill there are 28 *PKWT* workers. There is no evidence that the *PKWT* workers have been registered with the Department of Manpower and Transmigration of Kutai Kertanegara Regency.

Non-Conformance Description:

The company has not been able to show proof of reporting and recording of *PKWT* in accordance with Kepmenakertrans No. 100 of 2004 concerning Provisions for the Implementation of Certain Time Work Agreements, Article 13 that *PKWT* must be registered by the employer to the agency responsible for the employment of the local district, no later than 7 (seven) working days from the signing.

2.1.1 Status: Nonconformity No. 2019.01 with Major category
2.2

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

2.2.1.

The CH has demonstrate the legality of the land and the process of land legality that is still in the process. Summary of certified area that has land use title and not has land use title described as follows :

Description	PT PMM	PT TJA	TOTAL
Certified Area	15,308.36 ha	5,198.94 ha	20,507.30 ha
Has land use title (HGU) + HGB	11,079.10 ha		11,079.10 ha
Do not has HGU (progress)	4,229.26 ha	5,198.94 ha	9,428.20 ha

The detil described as follows :

PT PMM

Has obtained land use title (HGU) with the Decree of the Head of National Land Agency No. 02/HGU/KEM-ATR/BPN/2017

dated 05 January 2017 with a total area of **8,683.05 ha**, and there is land use title for building (HGB) of mill covering 12.23 ha based on Decree of the Head of National Land Agency No. 28/HGB/BPN-64/2015 dated 03 August 2015. For areas that have not received HGU, there are some area that still process of release status of forest area covered 760 ha with the status of Production Forest that can be converted.

Smallholder Cooperatives managed by PT PMM

1. Grengseng Indah Cooperative (Beringin Jaya Estate) has received the HGU with Decree of National Land Agency of East Kalimantan Province number 83/HGU/BPN-64/2016 dated September 29, 2016 with a total area of 176.21 Ha
2. Subur Makmur Cooperative (Beringin Jaya Estate) has received HGU with the Decree of the Minister of Agrarian and Spatial number 11/HGU/KEM-ATR/BPN/2017 dated 24 January 2017 with total area of 391.7 Ha.
3. Sawit Etam Cooperative (Lembuswana Estate) has obtained HGU with decree of National Land Agency of East Kalimantan Province No. 84/HGU/BPN-64/2016 dated September 29, 2016 with a total area of 180 Ha.
4. Mitra Sawit Mandiri Cooperative (Kahoi Estate) has obtained HGU with the Decree of the Minister of Agrarian and Spatial No 083/HGU/KEM-ATR/BPN/2016 dated December 22, 2016 with a total area of 971.59 Ha.
5. Maju Bangun Cooperative (Lembuswana Estate) has obtained HGU with the Decree of the Minister of Agrarian and Spatial No. 083/HGU/KEM-ATR/BPN/2016 dated December 22, 2016 with total area of 592.13 Ha.
6. Tanah Sama Cooperative (Bumi Permai Estate) is still in progress of obtain the HGU. At ASA-4, the company showed the progress of handling letter from National Land Agency of East Kalimantan Province with letter No.490/6-64/IV/2016 dated 21 April 2016 related to the completeness of the data.

PT TJA

- PT TJA has land use title for building (HGB) of bulking has had land use title for building covering 12.19 ha.
- For the Estates not yet have HGU, still in cadastral stage
- For the cadastral area in Rahayu Estate with an area of 2,466.18 Ha (Land Map No. 41/PB-64.200/VIII/2014, dated August 12, 2014) is still in the process of obtain the HGU. The latest process is the collection of Physical data and juridical data on 22 March 2017 in accordance with the letter from the Office of BPN. 360/9-64/III/2017 dated 9 March 2017.
- For the area of Rahayu Estate which is included in the location permit based on Kutai Kartanegara Regent's Decree No: 590/525.29/025/A.Ptn dated 30 December 2014 with area of 641 Ha, until this assessment is still in the process of forest area release.
- For the area of Mahakam Estate (location permit No. SK 100/DPN.K/IL-100/X-2008 27 October 2008 covering an area of ± 13,550 ha), is still in the process of releasing forest area.

Smallholder Cooperatives managed by PT TJA

1. Karya Bersama Cooperative (Rahayu Estate) is still in the process of obtaining the HGU with the last process conducted is Physical data and Juridical data collection on March 22, 2017 in accordance with Letter from BPN Office No. 360/9-64/III/2017 dated March 09, 2017.
2. Mitra Sejahtera Abadi Cooperative (Mahakam Estate):
 - Letter of Release of Plasma Location with total area of 140 Ha (No. 004/MSA/Regent/III/2011 dated March 21, 2011) sent to Kutai Kartanegara District with attachment Letter of Plasma Area Removal from PT. TJA, location maps and coordinate point.
 - Letter of Land Release (No. 007/KSU-MSA/BJ/III/2015 dated March 23, 2015) to PT. Tanito Harum known by Head of Bunga Jadi Village, Head of Plantation Agency and Cooperative Agency
 - Until the time of assessment, proposal letter to PT. Tanito Harum and Kutai Kartanegara District no response yet.

PT PMM have land legality dated on January 5th, 2017 (No. 02/HGU/KEM-ATR/BPN/2017) with total area **8,683.05 ha** and land use title for building with total area **12.23 ha** (No. 28/HGB/BPN-64/2015) and Smallholders cooperative managed by PT PMM as much as 5 cooperative with total area 2,323.86 and 1 smallholders still process. PT TJA has and use title for building with total area 12.19 ha and for the estate not yet have HGU still in Cadastral stage as much as **5,186.75 ha**. Total certified area for PT PMM & TJA covering **20,507.30 ha**.

Based on RSPO announcement dated 13 June 2018 were stated that RSPO grower member that are currently RSPO

certified, but are yet to obtain the HGU there certification can continue and they can proceed to recertification. This requirement is effective from the date of this notice until the end of 2019.

- Progress in managing land tenure rights of PT Teguh Jayaprima Abadi (scope of the certificate that has not yet Land use right). **OFI Number 2.**

2.2.2.

Prima Estate.

Boundary stones PMM 141B, PMM 142B, Block L37, South Division. It adjacent with cadastral area, all boundary on good condition and maintained.

Kahoi Estate.

Boundary stone PMM 119B, Block C37, North Division. It adjacent with cadastral area, all boundary on good condition and maintained. Boundary stones PLM KH035, Block C33, KKPA Division (Mitra Sawit Mandiri Cooperative). It adjacent with fruit plantation of Muara Kaman Village.

PT TJA.

Block I50. All PT TJA area doesn't have HGU, however there are trench barrier between cadastral areas with outside area.

Evidence observed:

- Based on field observations in Block I 50 –I 51 Division of North Mahakam Estate; in Block P50 & P58, South Division of Mahakam Estate, PT TJA, it is known that there are no legal boundaries.
- Based on interviews with the management of the area do not yet have land use right and are still in the cadastral process.

Description of Non-compliance:

- Based on the explanation above, the company has not been able to show evidence of clear boundaries in the field area. This become **Non-conformance No.2019.02 with the Minor category.**

2.2.3; 2.2.4 & 2.2.5.

Interviews with landowners in Loleng Village, Muara Kaman Hilir Village & Bunga Bunga Village, It is estimated that there were no customary rights, land in the area of the company was individual land (former cultivation). The company has compensated the land, the process by verifying the village in coordination with the residents, then coordinating, measuring, and making payments. At the time of handing over land do not coercion, residents gave up their land voluntarily. There is no use of paramilitaries during the surrender of community land.

The area in block I27-28 it's not yet be managed by the company. The area its still belong to villagers on behalf Tatus Badung with covering of 5.57 ha.

2.2.6.

The company already has an anti-violence policy in handling conflict: in the CSR policy signed by the President Director on April 27th, 2015 which among them explained that "Synergizing company, community and government resources to create harmony in communication and consultation, and not to use violence, use of the army payment and military for problem solving.

The results of interviews with landowners in Loleng Village, Muara Kaman Hilir Village & Bunga Jadi Village (Previous landowners), when land clearing did not use paramilitaries. When land surrender is not enforced, residents voluntarily surrender their land. There is no paramilitary during the surrender of community land.

2.2.2	Status: Nonconformity No. 2019.02 with Minor Category
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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; 2.3.2; 2.3.3; 2.3.4.

Interviews with landowners in Loleng Village, Muara Kaman Hilir Village & Bunga Bunga Village, It is estimated that there were no customary rights, land in the area of the company was individual land (former cultivation). The company has compensated the land, the process by verifying the village in coordination with the residents, then coordinating, measuring, and making payments. At the time of handing over land do not coercion, residents gave up their land voluntarily. There is no use of paramilitaries during the surrender of community land.

The area in block I27-28 it's not yet be managed by the company. The area its still belong to villagers on behalf Tatus Badung with covering of 5.57 ha.

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 & 3.1.2

The company has a business plan or management plan with a minimum planning period of 3 years that has informed about production budget, revenue plan, and price projections including the scheme smallholders (full manage or KKPA scheme). While PT TJA amounted to 22,011 tons. The estimated price of perton CPO is 493 US Dollars. For the peat area, there have been plans for flood prevention through the Estate program such as making trenches, making dikes, and water gates. Whereas replanting will not be carried out because the age of the oldest farm is 12 years while the oil palm planting cycle is 25-30 years

Evaluation activities have been carried out every year through management review for the 2018 budget, 2018 financial report, and evaluation of audit of public accountants based on the accountants' information from Tanudiredja, Wibisana, Rintis & Partner on April 10, 2019.

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 palm oil cultivation and processing procedures (SOP) available in Indonesian. Cultivation procedures regulate activities starting from the stage of land clearing, nursery, planting, maintenance, harvesting, sending FFB to the factory until replanting, while the processing procedure regulates activities starting from the FFB acceptance to testing the product quality. SOP has cover the key processes for example harvesting, transportation, manuring, IPM, GAP, and SCCS

Based on field observation to the block M58 & M59 Mahakam Estate KKPA division and block F37 Prima Estate known that workers have understood spraying and fertilizing procedures well for example the application of pesticides and fertilizers that are timely, accurate, and appropriate dosages. In addition, workers can also explain safely work both for themselves and for the environment

While field visits to Bumi Permai Mill were known to officers of sorting and grading have implemented SOP for receiving FFB well starting from determining FFB criteria, the number of FFB samples from each truck, and handling rejected FFB.

4.1.2 & 4.1.3

The SOP master list is available in the PT PMM and TJA SOP list documents. In addition, the SOP list is also found on the procedure book cover. The storage, updates and distribution of Master procedures that are owned are the responsibility of the Sustainable and Certification (S & C) Department. Procedures will be reviewed periodically once a year to be reviewed and adapted to existing developments. Changes (Revisions) to SOP documents are contained in the document "Monitoring Changes in SOP Documents". Meanwhile, the procedure for storing documents is contained in

document No. PMM / SOP / General-08 for PT PMM or No. TJA / SOP / Umum-08 for PT TJA.

Internal supervision is carried out by the level of supervision starting from the foreman, Assistant Division, Senior Assistant / Chief Assistant, to the level of Estate Manager. In addition there are internal audit departments that will carry out internal audits once a year. Based on information received from the accompanying officer it is known that the response to any nonconformities issued when the internal audit activity is a maximum of 14 days. Whereas the re-examination activities by internal auditors will be carried out a maximum of 1 year after the implementation of internal audit activities.

The internal audit implementation includes the following:

- Internal Audit Report for Prima Estate 30 October - 3 November 2018 carried out by the internal audit department. PT Evans Indonesia.
- Internal audit report for Kahoi Estate November 10-15 2018 carried out by PT Evans Indonesia's internal audit department

The inspection scope as stated in the report is the administration of bank cash, inventories, administration of oil palm crop production, and administration of maintenance of oil palm plants. In addition there are also internal examinations of the quality of work as carried out by the GM Agronomic Audit dated 12 December 2018 as follows:

- Kahoi Estate Manuring (block H42; H43; H44).

Observations: the application of fertilizers is actually not yet possible because the land is still too dry. The time to complete fertilization is too fast, which is only 2.5 hours for the application of 5 tons of fertilizer with 10 employees.

- Estate response:

The application of urea in dry land is dealt with by sprinkling fertilizers on inter row where there is a frond arrangement. More moist soil conditions and fertilizers are expected to be absorbed properly. The application of fertilizers that are too fast will be reassured by supervisory levels starting from foremen, division assistants, health offices, to estate managers by checking the principal per staple applied to fertilizer

4.1.4.

The Company has procedures for receiving FFB from third parties listed in the FFB supplier selection declaration letter. The company show CLA for sale & purchase FFB example:

- CLA with Andy Kurniawan with number /MKT-PMM/VIII/2018 date on August 14th, 2018 – August 13th, 2019.
- CLA with PT Jaya Mandiri with number 18/MKT-PMM/VIII/2018 on September 1st, 2018 – September 30th, 2018.
- CLA with PT Putra Bongan Jaya with number 01/MKT-PMM/I/2019 on January 15th, - January 14th 2019.

The company shows evidence of payment for FFB dated April 25th, 2019 to PT Putra Bongan Jaya & Payment to PT Jaya Mandiri Sukses on March 14th, 2019 through CIMB NIAGA Bank.

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 SOP for Good Agricultural Practices in managing soil fertility can be seen in Procedure No. PMM / SOP / AGRO-09 dated January 1, 2011 concerning fertilization. The implementation of procedures can be seen from the realization of fertilizing PT PMM and TJA. At the time of recertification, Urea had fertilized 141.09 tons in Kahoi Estate (61% of the annual plan); MOP amounted to 593.50 tons (99.98% of the one-year plan); and 0.10 Tons of Dolomite Fertilizer to the Mahakam Estate (for immature)

The plan and realization of PT PMM and PT TJA up to the recertification activities is carried out as follows:

Kahoi Estate (2019)

Fertilizer Type	Mature		Immature		Fertilizer/Ton FFB
	Recommendation (Ton)	Application (Ton)	Recommendation (Ton)	Application (Ton)	
Urea	232.61	141.09	6.46	-	0.009757

MOP	533.58	177.05	6.46	-	0.012243
TSP	-	-	5.75	-	-
RP	-	-	-	-	-
Kieserite	-	-	-	-	-
Dolomite	-	-	2.29	-	-
Borate	22.33	-	0.24	-	-
CuSO4	-	-	-	-	-
NPK	-	-	-	-	-
Compost	11579.87	2883.27	-	-	0.199382
EFB	4452.03	2193.15	-	-	0.15166

*Urea : 61%; MOP : 33%; Compost : 25%; EFB : 49%

* FFB Production (January – April 2019 : 14,461 Ton)

Prima Estate (2019)

Fertilizer Type	Mature		Immature		Fertilizer/Ton FFB
	Recommendation (Ton)	Application (Ton)	Recommendation (Ton)	Application (Ton)	
Urea	216.41	216.41	1.42	-	0.017215
TSP	-	3.90	1.42	-	0.00031
MOP	594.88	593.50	1.42	-	0.047212
Borate	25.59	13.34	-	-	0.001061
ZnSO4	-	0.23	-	-	1.83E-05
Dolomite	-	0.05	-	-	3.98E-06
Compost	7092	3209.03	-	-	0.255272

*Urea : 100%; MOP : 100%; Borate : 52%; Dolomite : 100%; compost : 45%

*FFB Production (January – April 2019 : 12.571 Ton)

Mahakam Estate

Fertilizer Type	Mature		Immature		Fertilizer/Ton FFB
	Recommendation (Ton)	Application (Ton)	Recommendation (Ton)	Application (Ton)	
Urea	109.04	82.64	8,05	2.65	0.016955; 0.00054
TSP	-	-	8,00	-	-
MOP	249.41	137.40	8,00	3.40	0.02819; 0.000698
Borate	10.11	-	-	-	-
Dolomite	-	-	-	0.10	2.0517E-05
NPK	249.41	-	-	-	-

*FFB Production (Januarijy – April 2019 : 4.874 Ton)

Based on interviews with manuring workers in the block F33 Kahoi Estate and block M58 Mahakam Estate revealed that workers had been able to explain the implementation of SOP from the application on time, on target, and on the right dosage. In addition, workers have been able to explain how to work safely both for themselves and for the environment.

4.2.3

Procedure No. PMM / SOP / AGRO-09 or No. TJA / SOP / AGRO-09 dated 1 January 2011 concerning manuring explained that manuring recommendations must be made based on the results of analysis of leaf and soil sampling unit. Based on the company Palm Oil Cultivation Guidelines, it is explained that leaf sampling and analysis are carried out once a year and soil sampling is carried out every five years.

Leaf Sampling Unit (Kahoi, Mahakam, Prima Estate)

Conducted on August 15, 2018 by PT Nusa Pusaka Kencana Analytical & QC Laboratory's R & D with parameters tested Ash, N, P, K, Mg, Ca, B, Cu and Zn

Soil Sampling Unit (Kahoi, Mahakam, Prima Estate)

Implemented in 2015 by SMARTRI Bogor with parameters tested: moisture content pH, C Org, CEC, Exchangeable Cation Ca, K, Mg, and Na.

4.2.4

The nutrition recycling strategy that is applied is by utilizing POME and Compost. While the kernel shell is used as boiler fuel. Records of the implementation and monitoring as stated in the monthly report of Bumi Permai Mill are as follows:

POME 2019

Month	FFB Processed (Ton)	Total POME from Mill	Ratio POME to FFB (%)	POME CHP (m ³)	to Total to LA
January	21128.45	9882	46.77	5657	12780
February	18483.66	8453	45.73	4558	10611
March	21244.02	9996	47.05	6511	10300
April	19916.34	8696	43.66	4496	2865
Total	80772.47	37027	45.84	21222	36556

*POME 2018 : 109.976m³

Compost 2019

Estate	Total application (Ton)
Kahoi	3833.93
Prima	4160.46

Based on field observation to block J40 Prima Estate are known to have application of compost as an additional nutrient for plants. Compost is applied at a dose of 40ton / ha.

Status: Comply

4.3
Practices minimize and control erosion and degradation of soils.
4.3.1

The company can show soil maps of PT PMM and PT TJA results of the 2009 semi-detailed soil survey conducted by PT Earth Line on a scale of 1: 90,000 and soil suitability maps of PT PMM with a scale of 1: 40,000 and PT TJA with a scale of 1: 35,000. Based on a map study it can be concluded that there is no soil with a slope > 20°. Potential fragile soils are Sapric Haplohemists covering an area of 25.98% or an area of 1,893.99 ha in the PT PMM area and 19.95% or an area of 3,632.30 ha in the area of PT TJA.

4.3.2

The policy of planting on the slopes is included in the Oil Palm Cultivation Guidelines Chapter B, which explains how to make a planting path on a hilly / slope area by making a row and SOP No. PMM / SOP / AGRO-05) dated January 1, 2014 concerning soil and water conservation stating that soil conservation activities include building silplit / foot hill drain, rorak / trenches, planting vertically and legume species and also included in SOP No. PMM / SOP / AGRO-04 dated January 1, 2011 concerning planting of legumes which explains that the type of beans used is Mucuna bracteata

Based on field observation to blocks N39 and N40 are known in certain slope areas by making terraces and planting Mucuna bracteata. In addition, the method of midrib arrangement on the edge of the terrace is also part of soil conservation.

4.3.3

The program and realization of road maintenance can be seen in the monthly estate report. Realization of road maintenance in 2018 includes the following:

Estate	Road Maintenance Manual (Mtr)	Mechanical Road Maintenance (HM)
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	Budget	Actual	Budget	Actual
KHE	6,233	6,233	1,388	1,388
PME	7,614	7,614	720,50	720,50
MKE	2,820	2,820	603	603

Based on field observation to the block C25 Kahoi Estate and block M55 Mahakam Estate known that the road conditions are good. This is indicated by the easy access of CR and MR roads by vehicles, especially FFB transport vehicles.

4.3.4

The peatland strategy is contained in document No. TJA / SOP / AGRO-12 dated January 1, 2012 concerning water management. Some of the strategies carried out include the creation and installation of piezometers for monitoring the surface water level to be no more than 60 cm and installation of collections and main drain. Water level is maintained at a height of 50-70 cm. observations are held regularly every week or four times a month

However, based on observed evidence such as:

- Soil suitability map of PT PMM and PT TJA states that there is land with the type of peat in the operational area of the company
- PMM / MAN-12 concerning Damage Control for Biomass Land for Production effective October 1, 2017 stating:
 - Peat Subsidence: Mount subsidence pole (weathered wood sticks, such as ironwood) that are stamped (scale) until they reach a stable base
 - Water management: can maintain a water level as high as 50 - 70 cm in the collecting duct or 40 - 60 cm on the piezometer
 - Regular monitoring of water level is important by installing a numerical measuring device at a strategic location and the entrance of the collecting channel. Number 0 on the peat surface that has been planted.
 - If the water level is > 25 cm then flow and if > 65 cm is held so that the water level returns to the recommendation limit
- RSPO Manual on Best Management Practices (BMPs) for Existing Oil Palm Cultivation on Peat :
 - The measurement of subsidence of peat can be done by installing a vertical hollow iron pipe with an outer diameter of about 8 cm and installed firmly into the mineral substrate. Area 2 x 2 m is maintained around the stake
 - Installing water level gauges at strategic locations and behind weirs. Make sure level 0 is on the peat surface planted
 - If the water level is > 25 cm then flow and if > 65 cm is held so that the water level returns to the recommendation limit
- Based on field observation found the following facts :
 - Blok L39: Level 0 water stick is not on the surface of the peat
 - Blok M41: Subsidence pole are not made of hardwood and are not perfectly embedded and are not equipped with a scale
 - Blok H37: Point 0 is the face of the peat and the water shows the number 90 cm - But water is still flowing
 - Blok E24: Subsidence pole made of iron pipes and equipped with a scale
 - Blok I52: Subsidence pole made of pipe is not covered with scale / mark
 - Blok J51: Level 0 water stick is not on the surface of the peat
 - News of repairs to water level block L39 PME on 15 May 2019. Point 0 has been adjusted to the surface of the peat.

Thus it can be concluded :

1. Monitoring of peatland subsidence and water management by the company has not fully referred to the RSPO Manual on Best Management Practices (BMPs) for Existing Oil Palm Cultivation on Peat and has not referred to the established procedures.
2. The company has not been able to show sufficient evidence that all peat monitoring carried out has used accurate

measuring instruments.

Nonconformity No.2019.03.

4.3.5

The company has not yet do drainability assessment of peatland area. Based on the hectare statement data in 2019, the earliest planting year at PT PMM and PT TJA was in 2007 or at the time of the one-cycle audit activity determined for 25-30 years. Thus, the company does not have a plan for replanting in the near future.

4.3.6

Strategies for critical land management and other land issues are included in the semi-detailed soil survey report of PT PMM and PT TJA carried out by PT Earth Line in 2009. The report describes the level of land suitability and the actions needed to be taken to raise the land suitability. Based on the report it is known that the limiting factors for land in the company's operational areas include low nutrient content, steep slope land, sandy soil, low-flood lands and peat soils.

Some recommended strategies include :

- Increase the organic content of the soil through recycling of nutrients, namely the application of EFB and POME compost, laying the midrib in the joint and between staples.
- Carry out fertilization based on the results of leaf and soil analysis that is carried out regularly.
- Making a system on land with a steep slope, planting legumes (*Mucuna bracteata*) and laying the midrib parallel to the direction of the contour
- Application of water management to low-lying areas and flood-prone areas, through the creation of drainage systems, piezometer monitoring, measurement of land subsidence (subsidence) and water level settings.

The certification unit has demonstrated the results of inspection and implementation of EFB and POME compost applications, results of soil and leaf analysis. recording of piezometer monitoring, measurement of peat subsidence and water level settings.

4.3.4	Status: Nonconformity No. 2019.03 with Major Category
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4.4

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

4.4.1.

Consistently CH has demonstrated water management plans for mill and estate in the following records:

- Environmental Management Plan as part of the EIA documents. The document includes following measures protection of buffer zone and surface waters and management of the wastewater through land application of to avoid water pollution.
- HCV area management plan drawn up in 2011, which includes the protection of riparian water and surface waters.
- The annual work plan of mills which includes plan for fulfillment of water needs to ensure water availability and water saving.
- The annual work plan of Estate which includes the plan of establishment of water reservoir in preparation for the dry season.

Based on field visits that all measures of water management plan have been well implemented such as protection of river buffer zone, monitoring the surface water quality, implementation of land application, saving of water resources and water reservoir establishment.

4.4.2

CH has identified all rivers and wetlands inside plantation concession areas. Documentation available in the EIA report and analysis of HCV containing distribution maps of the river in the area of PT. PMM and PT. TJA. The report showed the presence of some small streams and wetlands: Keham River (PT PMM), Kedang Semilis River (PT PMM), Paseban River (PT PMM), swamp as natural water reservoirs in the rain season. All of riparian and swamp identified as HCV has been designated as protected areas in accordance with SOP River Buffer Zone Management (PM/SOP/Umm-15).

Field observations in Mahakam Estate (Paseban River, Block O50-O55, South Division) showed evidence of surface water flow protection measures and including riparian wetlands, namely:

- Determination of river buffer zone with a distance of 50 meters left-right of small river and 100 meters for large rivers. Demarcation of the border is done with the installation of boundary markers river border.
- No chemicals application (fertilizers and herbicides) in the buffer zone area,
- Conducting erosion control plantings (Cover Crop) such as *Mucuna bracteata* and *Vertiver Grass*.
- Riparian conditions still have good cover, mostly overgrown with bushes and perennials.
- Periodic water quality testing every three months with the parameters of environmental quality standards as stipulated in Government Regulation No. 82 in 2001. The latest test results are available for the second half of 2018 shows that all parameters of water quality complies with the quality standards set.

4.4.3

Waste water of oil palm processing has processed through Waste Water Treatment Plant (WWTP) station. Sighted that POME from Bumi Permai Mill has been managed properly as described, waster water pocessing in WWTP with total capacity of 20,800 m³ using the anaerobic system, nutrient cycling through Land Application (after BOD and pH meet the requirements), some POME used as a mixture of composting to accelerate the composting process, and some of POME (30%) is used as a raw material for methane capture unit. Based on field visit on land application in Centre Division Block N41 & N44, Bumi Permai Estate. There are no run off and maintenance of flatbed routinely. The Block is accordance with the permit.

Effluent water quality has also been monitored regularly, as seen in the following:

- Daily Monitoring on waste water discharged and pH used for methane capture unit (30% of the daily discharge POME). Done thurough Log Book recording based on flowmeter measurement and pH testing by the laboratory staff.
- Daily monitoring on discharged waste water and pH of waste sent to land application. Done through Log Book recording based on flowmeter measurement and pH testing.
- Land Application Permit available in the decree of Kutai Kartanegara Regent number 660.1/002 /BHI/SK-LA/BLHD/III/2014. Formal testing on effluent quality for land application by external accredited laboratory (KAN LP-258-IDN). The test results has been reported regularly to the authorities. The test results for recent year until February 2017 showed that effluent qualty for land application is still meet standard in accordance Ministrial Regulation number 28 and 29, 2003.

Based on news on the website: <https://www.prolegalnews.co.id/limbah-pt-bar-formula-dan-pt-prima-mitrajaya-mandiri-pt-evans-mengancam-keselamatan-warga/> it is known that there is waste water pollution, where liquid waste is discharged to the swamp area. While the results of field observations result to the effluent pond, composting area, and land application area sighted that there is no waste water leakage indications. In addition, based on the results of public consultations with surrounding villages and Environment Agency of Kutai Kartanegara Regency obtained information that there were no complaint of environmental pollution or waste water leakage.

4.4.4

Bumi Permai Mill using river water and rainwater as raw water for FFB processing. The raw water is treated first at water treatment plant (WTP) to meet standard. The volume of water use is monitored on a daily basis using a flow meter installed at several outlets including those leading to the processing unit. The water use ratio of 2018 is 1.53 m³/ton FFB. The company sets a standard water use ratio of 1.5 m³/ton FFB (Letter of Manager Mill No: 01/SE-Efisiensi/BPM/01/2014), so that the general use of water in the Mill is still in the efficiency range. A field visit showed that the water treatment plant is in good condition. Flowmeter is in good condition and there is no indication of the inefficiency of water use.

Status: Comply

4.5

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

4.5.1

IPM is listed in the annual work plan which is then detailed into monthly and daily work plans. One of the IPM methods planned is for example by EWS (Early Warning System) through routine census of potential plant pests and diseases.

Based on the Integrated Pest Control SOP, it is known that potential pests identified are leaf-eating beetles, grasshoppers, fruit borers, termites, *Oryctes rhinoceros*, rats, wild boar, elephants and palm-leaf-eating caterpillars. However, for the operational areas of PT PMM and PT TJA, potential pests are specifically *Oryctes rhinoceros*, rats, and palm-leaf-eating caterpillar

The method used for pest control is a combination of cultivation, biological, mechanical and physical methods. The original species used in biological control is by planting beneficial plants such as turnera subulata and cassia. Realization of planting of beneficial plants is as follows:

- Casia Sp: May 2019 covering 122.69 in blocks I-32 to I-39 and block J-33 to J-39
- Turnera Sp: January 2019 covering an area of 462.69 Ha in L-33 to K-31 blocks

Biological control of rats using barn owl is planned to begin again in the middle of the year with an initial target of 1 nest box for 60 ha. The use of barn owl in previous years has not been successful because many nests collapsed and were damaged so that they were not occupied by barn owl. Thus the company has the opportunity to evaluate the construction of the nest and realize its development. **OFI**

In principle, by applying IPM the use of pesticides in controlling pests and diseases is expected to be minimal. Pesticides with minimal use, especially from rodenticides and insecticides. During the period 2019 to April there was no use of insecticides or rodenticides. While in 2018 the use of rodenticides was only found in Kahoi Estate with a total of 79 Kg. Every pesticide use is always based on the evaluation results from the pest control threshold.

Recordings of pest infestations up to April 2019 are as follows :

- **Rat**

KHE:

Based on the results of the census period October - December 2018 it is known that there are rats above the control threshold, for example blocks H33, H34, and G47. Follow-up is with the application of brodifacoum. For example in block H33. The results of the bait application will be census one week after the application. If the feed eaten is still > 20%, then period II feeding will be done. Control of rat with bait on the three blocks was completed in December because the census results after the application showed that the bait eaten was <20%

MKE:

Based on the results of the census of the three months in the period January - April 2019, it was found that there were no rats which exceeded the control threshold value. Rat attacks range from 0.00% - 4.69%. The highest attack is in block M54. However, the application of rodenticide is not carried out because it is still below 5%.

PME:

Based on the results of the census of the three months in the period January - April 2019, it was found that there were no rats which exceeded the control threshold value. Rat attacks range from 0.00% - 3.69%. The highest attack is in the L32 block. However, the application of rodenticide is not carried out because it is still below 5%.

- **Palm-leaf-eating caterpillar and *Oryctes***

The results of the third estate census show no attacks above the threshold of control. The results of field visits for example to block M42 PME; block C33 KHE; and the J51 block of MKE also found no signs of palm-leaf-eating caterpillar attacks, especially nettle caterpillar

4.5.2

The realization of integrated pest training carried out by the company includes the following:

- IPM Training April 28, 2019 Prima Estate attended by 27 participants. The material provided includes types of pests, how to calculate percent of attacks, how to census, how to take attacked midribs
- Kahoi Estate IPM Training on December 14, 2018 was attended by 4 workers. The material provided includes types of pests, how to calculate percent of attacks, and how to census,
- Training Application of KKPA rat baiting followed by 10 workers

Based on interview with the responsible officer for the pest control process is that the officer has been able to explain the

types of potential pests, frequency of observations, and methods of control. For example, for census rat, it is carried out faithfully 3 months with a control threshold of 5% of new attacks.

Status: Comply

4.6

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

4.6.1

Policies regarding the use of chemicals include the following documents:

- No. PMM / SOP / K3-11 or No. TJA / SOP / K3-11 dated January 1, 2011 which describes the procedure for managing hazardous waste. The procedure describes the classification of hazardous waste, control, administration and use of PPE for hazardous waste management officers
- No. TJA / SOP / General-17 dated January 1, 2011 concerning the storage and mixing of chemicals.
- For the use of specific products, the company has procedure No. TJA / SOP / General-16 for PT TJA or No. PMM / SOP / General-16 for PT PMM on January 1, 2011 concerning the use of pesticides

Steps to avoid resistance include applying the principles of using pesticides that are appropriate, timely, and on target. In addition, replacing the active ingredients of pesticides can also avoid resistance. The company shows the Justification of PT PMJ and PT TJA 2019 documents by identifying trade names, active ingredients, active ingredients, LD50, WHO classification, Type, form, systemic contacts, application methods, functions and justifications. The list of pesticides is explained in more detail in 4.6.2

4.6.2

The pesticide application program is included in the Annual Work Plan which will then be detailed into the Monthly Work Plan and Daily Work Plan. Records of the use of pesticides shown by the company include:

Kahoi Estate (January – December 2018)

Trademark	Active Ingredients		Chemical Usage (Kg / Liter)	Total a.i used	a.i/Ha
	a.i	%			
Gramoxone	Paraquat Diclorida	27.5	132.00	36.43	0.01546
Supremo	Glyphosate	48	1918.00	920.64	0.390699
Starane	Fluroxypyr	28.8	268.50	77.33	0.032817
Trendy	Methyl Metsulfuron	20.00	22.20	4.44	0.001884
Becano	Indaziflam	46.00	7.50	3.45	0.001464
Basta	Amonium Glufosinat	18.00	68.00	12.24	0.005194
Ratgone	Brodifacoum	0.005	79.00	0.395	0.000168

January – March 2019

Trademark	Active Ingredients		Chemical Usage (Kg / Liter)	Total a.i used	a.i/Ha
	a.i	%			
Gramoxone	Paraquat Diclorida	27.5	0	0	0
Supremo	Glyphosate	48	1944.50	933.36	0.396097
Starane	Fluroxypyr	28.8	232.50	66.96	0.028416
Trendy	Methyl Metsulfuron	20.00	32.30	6.46	0.002741
Becano	Indaziflam	46.00	5.00	2.30	0.000976
Basta	Amonium Glufosinat	18.00	65.00	11.70	0.004965
Ratgone	Brodifacoum	0.005	0	0	0

Mahakam Estate (January – April 2019)

Trademark	Active Ingredients		Chemical Usage (Kg / Liter)	Total a.i used	a.i/Ha
	a.i	%			
Supremo	Glyphosate	48	496.00	238.08	0.223684
Starane	Fluroxypyr	28.8	52.77	15.83	0.014873
Trendy	Methyl Metsulfuron	20.00	13.60	2.72	0.002556

Prima Estate

Trademark	Active Ingredients		Chemical Usage (Kg / Liter)	Total a.i used	a.i/Ha
	a.i	%			
Starane	Fluroksipir	29	84.32	24.45	0.010607
Roll-Up	Glifosat	41	567.00	232.47	0.100855
Erkafuron	Methyl Metsulfuron	20	18.30	3.66	0.001588

* Information about the LD50 is found on the MSDS of each product

4.6.3 & 4.6.4

The company can show Division work documents and document pest control plan activities which consist of detection and identification of pests, rat pest census, census of leaf-eating caterpillar pests, and planting of beneficial plants (*Turnera subulata* and *Cassia cobanensis*).

In principle, by applying IPM the use of pesticides in controlling pests and diseases is expected to be minimal. Pesticides with minimal use, especially from rodenticides and insecticides. During the period 2019 to April there was no use of insecticides or rodenticides. While in 2018 the use of rodenticides was only found in Kahoi Estate with a total of 79 Kg. Every pesticide use is always based on the evaluation results from the pest control threshold. Pesticides are not used by prophylactic. The certification unit uses pesticides with a rotation and selective spray system. The use of pesticides is applied with selective spray

A complete list of WHO group 1A and 1B pesticides is stored by the company's sustainability team and is available in each unit. The company has Circular Letter SE / HoOA-kaltim / 01/2013/001 dated January 1, 2013 concerning the reduction in the use of paraquat. The policy includes declaring the company's commitment to reduce paraquat use along with the increasing age of plants. During the period 2019 (January - April) there is no use of paraquat. The last time paraquat was used was the 2018 period of 132 liters. Whereas in the same period there were 79 Kg of Brodifacoum use. This is due to the attack of rat that exceed the control threshold (a detailed explanation of the application of brodifacoum can be seen in 4.5.1)

The use of brodifacoum is due to rat census exceed the control threshold. While the use of paraquat was last used in the period 2018. In 2019 there were no plans to use paraquat. Based on field observation to the PT PMM and TJA chemical warehouses also not found any paraquat stock. Thus be concluded the use of brodifacoum was minimal because it was based on identification of specific situations (rat census).

4.6.5 & 4.6.7

The company has a procedure for handling pesticides with No. TJA / SOP / General-17 and PMM / SOP / General-17 dated January 1, 2011 concerning storage and mixing of chemicals. Training for handling pesticides that have been realized include:

- Spray training on 22 April 2019 at the KKPA was attended by 8 participants. The material presented included PPE, weed type and dosage, application method, spray technique, and HSE aspects.
- Spray training on January 8, 2019 Mahakam Estate was attended by 13 participants. The material presented includes how to spray, type of weed, handling pesticides and the use of PPE

Based on observations and interviews with spray worker at Block F37 PME and block 58 KHE revealed that each employee had been included in training related to the use and handling of pesticides, furthermore employees could explain the target weeds for each pesticide, employees could also explain how to work safely both for itself and the environment

The application of pesticides always refers to product recommendations and application procedures. MSDS is available for each pesticide brand and in accordance with the regulation. During the recertification activity, the use of pesticides was not carried out. However, based on observations on the mixing and storage of known devices, the PPE used by the spray team includes mask, aprons, glasses, rubber gloves, and boots. PPE is in accordance with the HIRAC set by the company. There is a checklist of PPE checks made by the foreman to ensure the completeness of the PPE of each member.

Besides that the company also has a rinse room and a place for mixing pesticides. So that both workers and work equipment are always clean when before and after work. Pesticides taken to the field are not pure pesticides and are in the form of 1: 1.

4.6.6

The company has a procedure for handling ex-pesticide container and other agrochemical materials in document No. TJA/SOP/K3-11 and No. PMM/SOP/K3-11 dated 1 January, 2011. About the hazardous waste management. The procedure is explained as follows:

- a. The former chemical containers after use shall be washed at least three times and the containers is perforated before sending to the hazardous waste store. Flushing water should be managed and used again in the spraying activity.
- b. Place the pesticide container in a place that has obtained license from the related agency.
- c. Send the pesticide container to the licensed transporter.

Based on field observation result in the housing complex, around the Mahakam Estate Office and child care in Mahakam Estate. There were found chemical container used for trash bins. However, not all pesticide container is managed in accordance with the procedures and regulations. **It was raised as nonconformity No 2019.04.**

4.6.8

Based on document review and interviews with company representatives it is known that the application of airborne pesticides has never been carried out. The results of field visits to workshops and chemical warehouses also did not find any facilities and infrastructure for applying airborne pesticides.

4.6.9

The company has procedures for handling chemicals, including procedure No. PMM / SOP / K3-11 or No. TJA / SOP / K3-11 dated January 1, 2011 which describes the procedure for managing hazardous and toxic materials and Procedure No. TJA / SOP / General-17 dated January 1, 2011 concerning storage and mixing of chemicals.

The company has shown evidence of training for workers at PT PMM and PT TJA, for example as follows the Spray Training at the Mahakam Estate on April 4, 2019 to 13 spray employees and spray foremen, OHS Spray Training at the Mahakam Estate on January 9, 2019 to 13 spray workers and OHS Training and spraying Agronomy on March 30, 2019 at Beringin Jaya Estate with spray and foreman participants.

Based on the results of interviews with spray workers in Prima Estate (5 people) and in the Mahakam Estate (5 people), it is known that workers have been trained and given OHS-related understanding and how to work safely.

4.6.10

Based field observation in hazardous waste in Prima Estate, Kahoi Estate and Mahakam Estate, the used pesticide container are kept and then recorded on hazardous waste logbook. Afterward more, used pesticide container in transit hazardous waste storage will be sent to hazardous waste storage every month and then deliver it to the licensed waste collector by using the licensed transport. Beside that, based on interview with schedule waste officer, known that the worker understood the procedure related waste disposal such as chemical container used and keeping.

4.6.11

The company has shown the number of spray employees, including 18 spray employees and 2 spray foremen at Prima Estate. While at Kahoi Estate there are 23 spray employees and 3 spray foremen.

The company has conducted medical examinations for pesticide operators and foremen, while the realization includes the results of blood tests in Prima Estate for 18 spray employees and 2 spray foremen. It is known that workers are in normal conditions. And the results of blood tests at Kahoi Estate for 23 spray employees and 3 spray foremen were known that workers were in normal conditions.

Based on the results of interviews with spray workers in Prima Estate (5 people) and at the Mahakam Estate (5 people) it is known that workers have been tested for health (cholinesterase) and the results of health checks have been communicated to workers. Beside that, the worker said that there no indication of skin disease and itches.

4.6.12

The company has Circular No. SE / HoO-A / 03/2012/002 dated March 1, 2013 from the Head of Operational Agronomy (Sivabalan Subbiah) to all managers, staff and employees of PT. PMM and PT. TJA who explain the dangers of Spraying work for health, prohibiting pregnant and lactating women from carrying out Spraying activities and transferring work to other safer places

Based on the results of field visits at Prima Estate and at the Mahakam Estate as well as document review, it is known that the company does not use female workers to handle pesticides. In addition, it was explained that if there were those who had a level of cholinesterase that was below the threshold, the work mutation would be carried out in other parts free from the use of chemicals.

4.6.6 Status: Nonconformity No. 2019.04 with Major Category
4.7

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

4.7.1

The company has shown the OHS Policy which was approved by the President Director on January 2, 2011 which is available in Indonesian. The policy explains that the company will ensure operational activities are in accordance with OHS regulations, pay attention to safe work and provision of OHS-related training.

The company has shown that plans related to OHS in Estate and Mill in 2019 include OHS Supervision, namely inventorying unsafe conditions in work areas, Training for spray workers, fertilizers, harvests, manual maintenance, use of first aid and APAR use and health programs including activities periodic checks on employees, mutual cooperation and health education.

The company has conducted socialization and training related to OHS understanding to employees, including Training on Regulations on Law (Environment, Occupational Health and Safety) on March 5, 2019 to 39 people in the Mahakam Estate, Management Policy Training, Corporate Policy Dissemination, Supply Chain Training, Socialization Work Instruction, SOP training and Noise Training at the Mahakam Estate to 111 employees.

In addition, based on interviews with fertilizer workers in Block F33, Kahoi Estate found that OHS training and socialization could be conducted at the morning briefing.

4.7.2; 4.7.7

The company has identified and assessed all risks and hazard levels for all of its operational activities. Results of assessment of Hazard Identification and Risk Assessment can be indicated. The document explains the types of activities, hazards, effects, risk, risk control, residual risk and PIC.

Risk identification has been carried out for all operational activities including harvesting, maintenance, land clearing, operation of heavy equipment and machinery in the factory), transportation (transporting FFB, empty beds, CPO, Kernel) to other supporting activities (work in workshops, mixing chemicals, factory grading).

The company has a realization of engineering and administration control to prevent hearing loss such as daily engine maintenance, socialization related noise level area, install a signboard in the high noise area.

The company shows PT PMM and PT TJA Lost Time Accident for 2018/2019. The number of work accidents in all operational areas was 304 accidents and 390 days were lost. Based on observations in the field it is known that the company has implemented control measures in accordance with the risk analysis and MSDS on each product such as giving masks to spray workers, giving helmets to harvest workers, etc.

4.7.3

The company has shown documents related to the realization of the OHS program for Estate and Mill, while the recordings include OHS-related Training at BPE on January 4, 2019 with participants including maintenance employees, water operators, fertilizing employees, building employees and harvesters. In addition, socialization of dengue fever emergency

response at Prima Estate on January 8, 2019 with participants including foremen, division and clerk employees and RSPO / ISPO / ISCC Training on January 10, 2019 at BPE with participants covering all spray employees.

The company has also shown recordings of providing PPE to employees, among others, Minutes of PPE handover, OHS Contractor Training and Loss Fruit on May 15, 2019 to contractors on behalf of A.A and its members at the Prima Estate office. In addition, the minutes of handover of PPE (fabric gloves) on May 13, 2019 to harvest and picker employees (32 people) in the Prima Estate Central Division. And the minutes of handover of PPE (boot) on April 30, 2019 to spray employees (26 people) in the South Division of Prima Estate.

(1)

- Based on the results of field visits and interviews with Blok J40 Prima Estate, it was found that there were 2 harvest workers who purchased personal PPE independently.
- Based on the results of a field visit to Blok C33 Kahoi Estate, it was found that there were 1 harvest worker to purchase PPE personally / independently.
- Based on the results of a field visit to the Kahoi Estate Material Warehouse it is known that there is no stock helmet and shoes.
- Based on the results of a field visit to the Blok M55 KKPA Division, Mahakam Estate found that there were 1 harvest worker who purchased personal PPE independently.
- The company has Circular No. 03 / SEHOOA / 10/2017 concerning the standard PPE from the Agronomy Head Operations of Kalimantan Timur dated October 2, 2017 which is intended for all Senior Managers, Estate Managers, Assistant Heads, Asisstants, Supervisor of PT. PMM and TJA and S & C The department stated, among others:
 - Point 7: All personal protective equipment that has been distributed and damaged before the replacement time will be replaced by the company provided that it shows and returns the damaged PPE.
 - Point 11: Manager, Asssistant Manager, Division Assistant and Supervisor are responsible for inventorying the needs and procurement of appropriate PPE and monitoring utilization in the field.

(2)

- Based on the results of field visits and interviews with FFB transport contract workers in Blok L38, Prima Estate, it is known that workers do not use PPE (shoes and gloves).
- OHS Risk Assessment Analysis Document for the description of the work of transporting fruit from FFB Collecting Area to Truck/Trailer states that control measures for potential hazards of accidents include using PPE in the form of cloth gloves, boots/work shoes).

(3)

- Based on the results of field visits and interviews with workers at the Engine Room station it is known that the worker has not been given safety shoes, while for the shoes used at this time are rubber boots.
- OHS Risk Assessment Analysis Document for work locations in the Engine Room states that control measures for potential hazards of accidents include using PPE in the form of safety shoes, helmets and semi-leather gloves).

(4)

- Based on the results of field visits and interviews with workers at the Engine Room station, it is known that the worker does not have a operating permit license regarding *Pesawat Angkat dan Angkut..*
- Application for Class I Initial Drive Operator Training on behalf of Mahmud.
- Permenaker No. 38 of 2016 Chapter IV concerning Initial Activators (production power operators must be trained).

(5)

- Based on the results of a visit to the PPE storage warehouse in Prima Estate, it is known that there are several PPE lockers (for fertilizer labor). In addition, it is known that there are 2 lockers with PPE that are incomplete, namely PPE type masks and gloves.
- Based on the results of a visit to the PPE storage warehouse at Kahoi Estate, it is known that the company has provided several PPE lockers. But there is no PPE for fertilizer workers in the Central Division and KKPA.
- Based on the results of field visits and daily work plans (RKH) there is no fertilization activity.
- IK PPE Storage (step 4) states that Save PPE to the place provided and do not take it home.

The company has not been able to show that the provision of PPE and OHS-related training is in accordance with the procedures and applicable laws and regulations.

It is become Nonconformity No. 2019.05 with Major Category.

4.7.4

The company has shown the structure of *P2K3* which contains people responsible for carrying out OHS activities. The ratification of *P2K3* for PT TJA is in accordance with the Decree of the Head of the Manpower and Transmigration Office of East Kalimantan Province with the number KEP.566 / 1274 / *P2K3* / PPK / DTKT / 2017 concerning Ratification of the Occupational Safety and Health Development Committee (*P2K3*) of PT Teguh Jayaprima Abadi. Determination on April 17, 2017. As for PT PMM according to the Decree of the Head of the Manpower and Transmigration Office of East Kalimantan Province with the number KEP.566 / 1275 / *P2K3* / PPK / DTKT / 2017 concerning Ratification of the Occupational Safety and Health Development Committee (*P2K3*) PT PMM. Determination on April 17, 2017.

The company has shown *P2K3* meeting documents for Estate and Mill. The form of realization is on February 22, 2019, a discussion of the use of *SNi* helmets when driving, speed when driving, helmet use at harvest, safe storage of work tools, use of PPE and work safety. The meeting was attended by 10 participants at the Mahakam Estate. In addition, a *P2K3* and *LKS bipartite* meeting was held on December 14, 2018, a discussion of accident evaluation, interpretation of hazards and risks, discussion of the source of the accident and the cause of the accident and the provision of advice to management. The meeting was attended by 20 participants at Beringin Jaya Estate.

4.7.5

The company has demonstrated procedures related to accidents and emergencies. The procedures include the SOP for Handling Emergency Situations (TJA / SOP / General-10. January 1, 2011), SOP for Emergency Management (PMM / SOP / General-10. January 1, 2011), Emergency Response SOPs (PMM/SOP/General/39. On January 2, 2017, there was a discussion on First Aid which read: Accident Response and Recovery)

In addition, the company has a work accident investigation form that informs general data, victim data, facts obtained, description of accidents, source of accidents, type of accident, causes of accidents, conditions given, further actions, things that need to be reported. Made by an assistant and known by Estate Manager.

The company has shown footage related to first aid training, while the recordings include training on the use of first aid kits on October 30, 2018 with participants including Senior Managers, Estate Managers, Assistant Heads, Assistants, Employees and Foremen in the work area of PT PMM and PT TJA. In addition there were training and socialization of First Aid Officers to the spray foreman on February 6, 2019 at Prima Estate, the training was attended by North Division staff and spray supervisors.

Based on field visits to fertilizing activities in Block F33 Kahoi Estate, it is known that the foreman has been equipped with first aid kits according to Minister of Manpower Regulation No.15 of 2008 with a total of 21 items. Beside that, based on interview with worker (mill), they know related emergency procedure such as muster point and emergency sign alarm.

4.7.6

Has been provided the first aid room facility in the respective divisions, clinic that can serving inpatient, maternity, first aid and health education services. Accident insurance conducted in collaboration with BPJS, all employees are registered for insurance (Permanent Monthly Worker and Contract Worker).

The company has shown footage related to accident insurance including:

- Payment of Employment Insurance (*BPJS Ketenagakerjaan*) in Kaman Hilir Estate (Kahoi Estate) for March 2019 (440 workers) in accordance with receipt No.00000237877 dated 18 April 2019.
- Payment of Employment Insurance (*BPJS Ketenagakerjaan*) at Bumi Permai Mill for March 2019 (134 workers) in accordance with receipt No.00000152118 dated April 18, 2019.
- Payment of Health Insurance (*BPJS Kesehatan*) in the Mahakam Estate for May 2019 (196 workers and 283 dependents) in accordance with reference number 20190510450688384.
- Payment of Health Insurance (*BPJS Kesehatan*) in Rahayu Estate for May 2019 is IDR 50,840,705 with Reference Number 201905101641403569.

Based on interview with PT Putra Bongan Jaya (contractor owners), it was explained that if there were employees who were sick, all costs would be borne by the contractor. He also were showing sample of medical bill for his workers.

4.7.3	Status: Nonconformity No. 2019.05 with Major Category
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4.8

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

4.8.1 & 4.8.2

The company has shown a training matrix in 2019 which contains training programs for all aspects of plantations and mill operations. The plans include OSH training, training related to RSPO/ISPO/ISCC, training related to procedures in each activity/work as well as environmental/HCV related training.

The company has shown footage regarding the realization of training programs for Estate and Mill, while the recordings include:

- OHS-related training at BPE on January 4, 2019 with participants including maintenance employees, water operators, fertilizing employees, building workers and harvesters
- RSPO / ISPO / ISCC Training on 10 January 2019 at BPE with participants covering all spray employees.
- Training Contractors at Bumi Permai Estate on 11-12 January 2019 related to K3, RSPO, ISPO, ISCC, use of PPE, environment and conservation area. The training was attended by foremen and contractor employees.
- Based on document review. It is know that the company has a training related high noise at Mahakam Estate on March 2019.

In addition, based on interviews with fertilizer workers in Block F33, Kahoi Estate found that OHS training and socialization could be conducted at the morning briefing.

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

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

5.1.1.

PT. PMM and PT TJA has adequate environmental document, as described belows:

1. Environmental Impact Assessment (EIA) for Mill, composed in 2010 covering an an area of \pm 46,055 Ha including Storage Tank and special dock area \pm 28 Ha. Has been approved by Regent Kutai Kartanegara on December 13, 2010.
2. EIA for Estate of PT PMM, made in 2008 covering area of 21,500 hectares. Has been approved by the regent Kutai Kartanegara on 24 September 2008.
3. EIA for estate of PT TJA in 2009 covering an area of 13 550 hectares, approved by local authorities on March 16, 2009.

Structure and content of those EIA documents in PT PMM and PT TJA have met the requirement and regulations and have been approved by the authorities. Those EIA documents provided evidence of public consultation processes with the interested parties to identify impacts and formulatunge necessary mitigation measures.

5.1.2

Based on the EIA document, CH has developed an Environmental Management Plan (RKL) as outlined in the matrix of impact management plan:

PT. PMM

1. Management and monitoring plan of environmental impacts in mill that includes aspects: work safety, public health problems, noise, ambient air quality, odor, occupational health, public health, emergency, Potential fires and explosions.
2. Management and monitoring plan of environmental impacts in Estate of PT. PMM covers: Decrease in water quality, reduction in the number and diversity of aquatic biota, decline in business opportunities for community, disorders of occupational health and safety, ambient air quality, public health, attitudes and perceptions of community.

PT. TJA

Implementation report of RKL-RPL in Estate of PT. TJA including:

- Decrease in the quality of surface water (Sabiluntung, Mahakam, and lakes around the project)
- The decline in aquatic biota at project site
- The emergence of risk of health problems and accidents
- Quality of ambient air
- Disruptions of traffic
- Disruption of public health
- Impaired occupational health for workers
- The decline in environmental sanitation
- Decrease in ambient air quality
- Noise
- Attitude and positive perception of society
- Quality of HR community
- Employment and business opportunities

CH has implemented the environment management plan, for example based on field observation in estate and mill, all workers are provided by PPE, such as ear plug and ear muff and there is a periodical medical examination for worker. Besides, there is also signboard for prohibition of chemical spraying in riparian areas to prevent the decrease in water quality. Based on interview with local communities at loleng village and muara Kaman ilir village, it was sighted there are no environment negative impact from estate and mill.

5.1.3.

The company was shows some evidence as follows:

- a. Realization report of RKL-RPL PT PMM-Mill in semester II year of 2018 has explained the management and monitoring of several impacts, including: air quality, OSH, noise, increasing odor, decreasing soil fertility, disturbing of aquatic biota, decreasing the quality of surface water, environment sanitation, increased waste water, CSR program, emergencies and public health problem.
- b. Realization report of RKL-RPL PT PMM-Estate in semester II year of 2018 has explained the management and monitoring of several impacts, including: water quality improvement, reduction of the number and variety of biota, charity of assistance to the fisheries community, OHS disruption, decreasing the ambient quality, disruption of the communities respiratory tract, and communities perceptions.

However, there are several nonconformities number 2019.06, as follows:

- a. The RKL-RPL realization report Mill Unit not yet discussed the management and monitoring of potential fire and explosions in accordance to RKL-RPL Matrix.
- b. In the discussion chapter of Estate Unit, there are something that are not yet appropriate, so the trend evaluation, critical level evaluation, and compliance evaluation are priceless. For example:
 - Emission testing result in Bumi Permai Mill with NO2 parameters exceeding the quality standard, however it not been evaluated.
 - Ambient testing result in front of Bumi Permai Mill Office on December 2018 are written as the test result of the Housing complex of Bumi Permai Mill.

- The naming of the river not yet according to environment documents, for example: unnamed river (supposedly Bukit Jering River) in Prima Estate and Tebelai River (supposedly Muara Kaman Tua River) in Kahoi Estate.

It is become Nonconformity No. 2019.06 with Minor Category.

5.1.3 Status: Nonconformity No. 2019.06 with Minor Category

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.

CH has conducted the identification of HCV in the operational area of PT. PMM & TJA in 2011 – 2012 in collaboration with competent third party (Envirologic and Aksenta Consulting). Executive identification member is RSPO approved HCV assessor. The identification of HCV have involved communities surrounding villages (Benua Puhun, Rantau Humpang, Loleng), owner of enclave area and land acquisition team. Based on identification, HCV area covering 1,410.71 Ha in PT PMM and 440.93 Ha in PT TJA. Total HCV area for this certification is 1,851.64 Ha.

The identification results showed the presence of HCV and the presence of protected species legislation with endangered category (tiles) and vulnerable, as follows:

- Endangered species: Trenggiling (*Manis javanica*), Kucing ikan (*Prionailurus planiceps*), Bekantan (*Nasalis larvatus*), Owa kelawat (*Hylobates muelleri*),
- Vulnerable species: Pesut mahakam (*Orcaella brevirostris*), Beruk (*Macaca nemestrina*), Sero ambrang (*Aonyx cinerea*), Babi jenggot (*Sus barbatus*), Surili (*Presbytis frontata*)

The CH has comply with legal requirement to protected species in accordance to Government Regulation number 7 year of 1999. The CH also has socialized with signboard about prohibition of hunting in accordance to government regulation on the strategic places, as follows security post and Division office

5.2.2 & 5.2.4

The management unit has compiled a Management and Monitoring Plan of HCV until year of 2020. The measures taken to protect RTE and HCV are:

- Training protected vegetation inventory and monitoring inspections.
- Training wildlife conflict mitigation.
- Creating and maintenance of signboards.
- Installment of signboard of HCV and conservation area in each estate
- Transect plot mapping
- Identify threats and sources of threats.
- Vegetation Analysis
- Creating a mechanism flowchart protected animals.

The HVC management plan has consider the evaluation of HCV monitoring result period 2018. Beside that, based on field observation to several HCV location sighted that the company has realized the management plan in accordance to consultant recommendations. For example:

1. Block K34/K35, Central Division, Prima Estate HCV1 & HCV4. Based on field observation there are signboard which inform about area, HCV information and RTE species.
2. HCV area (HCV3, HCV4.1; HCV4.3), Block I50-I58, North Division, Mahakam Estate. Based on field observation there are signboard which inform about area, HCV information and RTE species.
3. HCV4 (Paseban River), Block O50-O55, South Division, Mahakam Estate. There are information signboard, chemical application prohibition.

The CH has HCV management plan to protect the HCV area, for example: regularly monitoring of HCV signboard was conducted together with security patrol.

The CH has conducted regularly monitoring every semester. Based on species monitoring result, that founds several Endangered species, such as: *Manis javanica*, *Prionailurus planiceps*, *Nasalis larvatus*, and *Hylobates muelleri*.

5.2.3.

The company has socialized about HCV to the villagers (Benua Puhun, Bukit Jering, Bunga Jati, Lebaho Ulak, Lebak Mantan, Loleng, and Muara Kaman Ilir) dated 3-6 December 2018 and also dated 10-13 December 2018. In addition that the company also has socialized to the workers on 18 February 2018.

Based on field observation in the HCV area in Block O50, South Division of Mahakam Estate it is known that riparian of Paseban River is maintained and there are information prohibition of hunting, planting tree species. The field observation showed that HCV signboard installed in each estate. Based on interview with worker in PME, KHE, and MKE, it is known that they already know about conservation area and prohibition to capture, collect, or kill RTE species.

5.2.5.

Based on the results of the study documents, it is noted that the entire area of the concession including HCV areas have been freed from the interests of other parties. The management unit showed evidence of land compensation agreement for HCV area, for example:

- Evidence of indemnity at Block N26/27, O25/26 for an area of 16:43 Ha.
- Evidence of indemnity located in Block K/L24/25 covers area of 8.7 ha.

Status: Comply

5.3

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

5.3.1.

The company has identify waste sources based on the type of operational activities in estate and mill. For example:

- Waste from pesticide store: chemical container used. The container is cleaned three times in the mixing area and then stored in the Hazardous Waste Store. It can be re-used for poison mixture. The hazardous waste on the store will submitted to the collector after three months.

Waste from fertilizer activities: fertilizer sacks, collected and stored in a fertilizer store, to be used again as a loose fruit container. While the plastic sacks of fertilizer are collected then washed and disposed to anorganic waste.

The CH has conducted socialization about waste management to the estates and mill workers.

5.3.2.

The company has hazardous waste storage in each unit, mill and estate. The permit of Hazardous Waste store signed by regent of Kutai Kartanegara Regency for PT PMM Mill, Kahoi Estate, Muara Wahau Estate and also PT TJA (Mahakam Estate & Rahayu Estate).

The waste is collected by the transporter of hazardous waste (PT Sumber Agung Srimarti) with agreement letter No 03/RSPO/SPK-LIMBAH/PMM-SAS/03/2019 dated 29 March 2019 (PT PMM) and No 04/RSPO/SPK-LIMBAH/TJA-SAS/03/2019 dated 29 March 2019 (PT TJA). Document of hazardous waste transporting is in form of minutes of meeting of handover and manifest.

The latest handover of hazardous waste of PT PMM, among others:

- No 0000817 for infectious waste as much as 0.03 tonnes on 4 January 2019
- No 0000816 for contaminated waste as much as 0.36 tonnes on 4 January 2019
- No 0000815 for used oil as much as 1,019 litre on 4 January 2019
- No 0000782 for used accu as much as 7 Pcs tonnes on 4 January 2019

PT TJA

- No 0000823 for infectious waste as much as 0.01 tonnes on 4 January 2019
- No 0000822 for contaminated waste as much as 15.68 tonnes on 4 January 2019
- No 0000819 for used oil as much as 0.34 tonnes on 4 January 2019
- No 0000818 for used accu as much as 7 Pcs tonnes on 4 January 2019

5.3.3

1. The company has a procedure for hazardous waste management number PMM/SOP/K3-11 dated 2 January 2011 which describes the procedure for hazardous waste management as stipulated in the Environment Law and prevents & overcomes pollution or environment damage caused by hazardous waste.
2. The company shows the minute of meeting infectious waste transportation on 2 April 2019, consisting of 1,021 kassa, 195 syringes, 79 ampoules, 37 underpads, and 173 hanscoen. With the weight of each medical waste: 10 Kg and sharp medical waste: 2.8 kg. Based on interview with S&C Department Staff, it was explained that medical waste was transported by PT Mitra Hijau Asia.
3. Based on field observations at landfill, block J36, Prima Estate founded that there were three used paint cans.

However there are several non conformities (No 2019.07), as follows:

1. The company has not been able to demonstrate the manifest of infectious waste collect by PT Mitra Hijau Asia.
2. The hazardous waste procedure has not been properly implemented by the company.

5.3.3 Status: Nonconformity No. 2019.07 with Minor Category
5.4

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

5.4.1.

CH has consistently implemented efficiency of fossil fuel efforts through renewable energy usage by using shell and fiber. It efforts has documented and monitored well. For example, in monitored renewable energy usage and efficiency analysis document recorded as follows:

Month	FFB Process (ton)	Solid waste usage (ton)		Fiber & Shell usage efficiency	
		Fiber	Shell	Fiber	Shell
July	26,041.14	4,036.47	1,411.46	0.16	0.05
August	25,054.14	3,883.39	1,357.93	0.15	0.05
September	27,859.14	4,318.17	1,509.97	0.16	0.05
October	23,266.38	3,606.29	1,261.04	0.16	0.05
November	25,896.22	4,065.06	1,421.46	0.16	0.05
December	21,436.19	3,322.61	1,161.84	0.16	0.05
Total	149,553.21	23,231.99	8,123.70	0.16	0.05

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 & 5.5.2

The policy on prohibiting burning when clearing land is still the same as the previous assessment stated in the SOP. Land clearing (PMM / SOP / AGRO-02 and TJA / SOP / AGRO-02) dated January 1, 2011 describes the land clearing system without the use of fire (Zero Burning) but uses a mechanical system starting from the preparation stage, land clearing system, blocking, road construction and terrace making.

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 identified the sources of gas emissions and pollution, as indicated in the document of inventory and

mitigation report of PT PMM and PT TJA, based on those documents emissions and pollution generated by the mill and plantation operational such as CO₂, NO₂, CH₄ and noise. Evidence of mitigation plan and its implementation can be demonstrated such as: not use urea as fertilizer in estate for manuring activity, reducing the use of fossil fuel for FFB transportation and processing at the mill with the use of shell and fiber for fuel and planned the effective route, as well installed the biogas plant to capture the methane to be converted into electrical energy.

During field observation, all workers in process station have used PPE (earplug / ear muff), and there are reports of audiometry test results for the period of 2019 (reportedly no employees with hearing loss). Noise tests are conducted regularly every 6 months by accredited labs, eg for sem 2 year of 2018, noise at boiler was 84 dBA, noise at engine room was 90 dBA and biogas plant was 62 dBA. The CH was monitored smoke emission in accordance to PermenLH No 7 year of 2007 every semester. However there are no requirement for smoke observation chart on the national regulation.

5.6.3

The Company has performed GHG calculations using RSPO PalmGHG calculator, the calculation results reported in this Re-certification summary report, as following:

Summary of net GHG emissions from PalmGHG calculator

Product	tCO ₂ e/t Product
CPO	9.11
PK	0.00
PKO	0.00
PKE	0.00

Description	Unit	Value
Total Planted Area	Ha	11,705.36
Total Planted Area on Peat	Ha	2,741.64
Total Oil Palm Planted Area	Ha	14,447.00
Conservation Area	Ha	1852
FFB Production per hectare	t/ha	20.10
OER	%	23.90
KER	%	4.96

Mill emission and credit

Description	tCO ₂	tCO ₂ e/t FFB
Emissions Sources		
POME	630,186.75	2.11
Fuel Consumption	865.74	0.00
Grid Electricity Utilisation	0.00	0.00
Credits		
Export of Excess Electricity to Housing & Grid	0.00	0.00
Sale Of PKS	0.00	0.00
Sale Of EFB	0.00	0.00
Total	631,052.49	2.11

Estate/Plantation field emissions and sink

	Own			Group			3 rd Party		
Description	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e/t FFB	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e/t FFB	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e/t FFB
Emission Source									
Land Conversion	107,705.54	49.82	2.72	0.00	0.00	0.00	0.00	0.00	0.00
CO ₂ Emissions from Fertiliser	15,883.43	7.32	0.39	0.00	0.00	0.00	0.00	0.00	0.00
N ₂ O Emissions from Peat	20,370.40	8.98	0.53	0.00	0.00	0.00	0.00	0.00	0.00
N ₂ O Emissions from Fertiliser	8149.30	3.78	0.21	0.00	0.00	0.00	0.00	0.00	0.00
Fuel Consumption	1,325.27	0.66	0.04	0.00	0.00	0.00	0.00	0.00	0.00
Peat Oxidation	148,578.60	65.49	3.86	0.00	0.00	0.00	0.00	0.00	0.00
Sinks									
Crop Sequestration	-	-65.53	-3.58	0.00	0.00	0.00	0.00	0.00	0.00
Sequestration in Conservation Area	-5,538.68	-2.80	-0.16	0.00	0.00	0.00	0.00	0.00	0.00
Total	154,812.12	2.23	4.01	0.00	0.00	0.00	0.00	0.00	0.00

Palm oil Mill Effluent (POME) Treatment

Divert to compost	70 %
Divert to anaerobic digestion	30 %

POME Diverted to Anaerobic Digestion

Divert to anaerobic pond	0.00 %
Divert to methane capture (flaring)	0.00 %
Divert to methane capture (electricity generation)	100 %

Status: Comply
PRINCIPLE #6 Responsible consideration of employees and of individuals and communities affected by growers and mills
6.1

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

6.1.1; 6.1.2; 6.1.3; 6.1.4; & 6.1.5.

A social impact assessment was done in June 2012, conducted by PT Aksenta Gagas Dinamika and final report prepared in October 2012. In the SIA report document showed enclosed the involvement of the community and employees. Community and employees participative are showed in FGDs attendant list and photograph, questioner document, and direct interviews. There is a list of attendance and documentation of meetings with the surrounding community which involves 94 parties. There is SIA Assessment for Plasma of PT PMM by BIOREF of Forestry Faculty of IPB. It was conducted on March 6th-10th 2017. Public consultation was been held on March 6th 2017.

There is a list of attendees and documentation of FGD meetings with the surrounding community, a list of 94 community resource persons and other attachments stating that the document was prepared by involving the surrounding community. In addition there is evidence in the form of photographs of activities at the time of the meeting with the community.

The company shows the SIA plan for 2019 period with details:

1. The existence of community-owned oil palm plantations in the Cooperative plasma permit area
2. Identify ownership of community land legality during field surveys.
3. Coordinating with stakeholders.
4. Increasing the socialization of the importance of developing smallholdings for the community, especially members of cooperatives.
5. Increase community understanding regarding the positive impact of independent plasma plantations.
6. Providing CSR programs in the fields of education, health, infrastructure and community empowerment.
7. Conduct health and medical checks on the community.
8. Road repair and maintenance.
9. Training in community empowerment programs.
10. Environmental management program
11. Employment aspects.

The company shows a review of the implementation of social management for the period January – December 2018 which informs the description, actions, frequency, plans, implementers, PIC and status. Example: To increase capacity by conducting training to members of the administration plasma Cooperative every once a year.

Based on interview with Head of Loleng Village, Muara Kaman Hilir Village, Bunga Jadi village and loleng village. There have never been issues related to environmental pollution, conflict & land disputes. So there is no negative impacts related social in the company.

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; 6.2.2 & 6.2.3

The company has demonstrated consultation and communication procedures. The procedures include:

- SOP with PMM / SOP / General-02 code on Transparency of Information dated 2.1.2011
- SOP with PMM / SOP / General-05 code regarding Complain Internal & External dated 2.1.2011
- SOP of Communication and Consultation no. PMM / SOP / General-22 which took effect from January 1, 2013. In the SOP it was explained about communication procedures and consulting companies with the community / companies, companies with government, companies with NGOs, companies with parties that are in conflict with companies and companies with women.

The list of stakeholders of the company consists of 8 Villages represented by the Village Head, 7 Indigenous Peoples, 8 Cooperatives represented by the Chairperson, 3 Hospitals and Health Centres, 6 Departments and Government Agencies, 4 companies around the plantation, 23 suppliers, 8 Contractors and 3 *Kapolsek* and 2 *Danramil* from Muara Kaman District, Kota Bangun and Muara Wis.

The company has appointed an officer responsible for external issues, namely Mr Andreas Tarigan, the position of Manager of Partnership with SK no. 001 / SPK-PKWT.M-Pemitra / PMM-HR / I / 2015.

In addition, the company has also shown the position structure and job description for officers in the Partnership Unit.

Based on the results of public consultations with agencies, contractors and the community are known that stakeholders have known people who are responsible for communication and consultation activities.

Status: Comply

6.3

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

6.3.1

The company has a mechanism for submitting complaints and complaints to workers, which are listed in the SOP of internal and external complaints with No. PMM / SOP / General-05 document that came into effect January 1, 2011. The procedure contains the Purpose, Responsibility, Procedure and Documentation. The Procedure have a clause that states the guarantee of the confidentiality of whistle blowers and reporting witnesses.

In addition, to counter complaints, suggestion boxes are also provided as a means of submitting complaints that can be submitted anonymously.

The flow of complaints is that employees write down the problems in the complaints book that are available at the Estate office, then at least 2 weeks seek settlement in advance (coordinating with the Senior Manager and General Manager, Legal HR) and completing documentation.

6.3.2

There were cases of disputes between 7 PKWT employees at Kahoi Estate (represented by SERBUNDO / Indonesian Plantation Workers Union), where the 7 PKWT employees refused to extend the PKWT and wanted to be appointed permanent employees if the company still needed them. Where some of them have worked for more than 1.5 years and have been extended several times the PKWT contract, which according to them this is not in accordance with the laws and regulations in Indonesia. This case has entered the RSPO Complaint System.

Related to this, the company has shown documentation of handling complaints, with progress including the following:

(1) Results after mediation on March 19, 2018 between the Parties are as follows:

- The company is willing to employ 5 people as workers through an agreed mechanism while complying with applicable regulations and by not reducing workers' rights;
- workers can start work effectively starting April 1, 2018;
- Process wages (process wages) will be further negotiated between various parties (i.e. companies, workers, trade unions)
- The Parties agree to report on the progress of this implementation to RSPO

(2) On April 2, 2018 the Respondent issues a decree concerning the status of the five individuals as permanent workers as of April 2, 2018.

(3) The Complaints Panel has decided to dismiss the complaint (22 April 2019) based on the following matters:

- The Company has complied with the Complainant demands in connection with the appointment of Mr. Junaidin, Mr. Nurdiana, Mr. Sannery, Mr. Landa and Mr. Armin Ibrahim has been a permanent employee since April 2, 2018.
- It was found that there were no breach of the RSPO P&C 6.3 or other key documents, because this request had been fulfilled by the Company.
- Regarding the issue of the wage process (Process Wages), the status of five individuals prior to their appointment as permanent workers is as contract supervisor and therefore does not meet the requirements for the wage process based on the relevant regulations. Furthermore, it was considered that during the filing of the complaint 5 these workers refused to sign the PKWT and had not yet been appointed as permanent workers. Accordingly, based on relevant laws and regulations, former workers are not entitled to receive Wages Process Payments based on the Indonesian Labor Law. Thus it was found that there were no violations of the RSPO P & C 2.1.
- In accordance with Section 14 CAP, one of the parties to this Complaint, who wishes to appeal this decision, he must have the right to file an appeal notice, no later than sixty (60) working days from this date.

Status: Comply

6.4

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

6.4.1; 6.4.2 & 6.4.3.

Interviews with landowners in Loleng Village, Muara Kaman Hilir Village & Bunga Bunga Village, It is estimated that there

were no customary rights, land in the area of the company was individual land (former cultivation). The company has compensated the land, the process by verifying the village in coordination with the residents, then coordinating, measuring, and making payments. At the time of handing over land do not coercion, residents gave up their land voluntarily. There is no use of paramilitaries during the surrender of community land.

There is no any land conflict in the company. The area in block I27-28 it's not yet be managed by the company. The area its still belong to villagers on behalf Tatus Badung with covering of 5.57 ha.

The procedures related to land acquisition and compensation do not change from the previous assessment listed in the Land Acquisition Standard Operating Procedure document with PT PMM Document No.; PMM / SOP / General-19 dated January 1st, 2009 which be equipped with low Land Acquisition Chart.

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 & 6.5.2

The company has shown the Decree of the Governor of East Kalimantan No. 561 / K.594 / 2018 concerning Determination of the Minimum Wage of Kutai Kertanegara Regency in 2019 amounting to Rp 2,930,304.19.

In addition, the company has shown the Determination of PT PMM Permanent Employee Wages in 2019 in Kutai Kertanegara Regency according to SK No.008 / SK.UPAH / PMM-HR / XII / 2018 dated December 20, 2018 stating that adjusting employee wages fixed daily (SKU-H) Rp. 2,930,305 as of January 1, 2019.

Whereas the Determination of Monthly Employee for 2019 in Kutai Kertanegara Regency complies with SK No.009 / SK.UPAH / PMM-HR / XII / 2018 dated December 20, 2018 which states that adjusting the monthly daily employee wage (SKU-B) is increased by Rp 217,813 from wages calculated from January 1, 2019.

The company has shown documentation on employee wages, including:

- Employees with initial MBM (Division Inti Utara) in April 2019 receive a basic wage of Rp 2,930,305. The additional elements of the allowance include Work Accident Guarantee, Death Guarantee, Health insurance (*BPJS Kesehatan*) and Pension Insurance Benefits.
- Employees with the initial YBF (Divisi Inti Selatan) receive a basic wage of Rp 2,930,305 with added Harvest Premiums and Non-Harvest Premiums. The additional elements of benefits include Work Accident Guarantee, Death Guarantee, Health insurance (*BPJS Kesehatan*) and Pension Insurance Benefits.
- Contract Employees (*PKWT*) in April 2019 receive a basic wage of Rp 2,930,305. The additional elements of the allowance include Work Accident Guarantee, Death Guarantee, Health insurance (*BPJS Kesehatan*) and Pension Insurance Benefits.

Based on document verification, its known that CH has conducted direct work agreement with the workers such as permanent worker and temporary worker. For example, in Mahakam Estate, the are 158 daily permanent worker and 68 temporary worker. Based on field observation at Block M55, Divisi Selatan, Mahakam Estate, there are no issues related illegal worker or family genk.

Based on the results of interviews with workers in the Estate and Mill, it is known that the wages received are in accordance with the stipulated wages, including the calculation of overtime. Based on interviews with the *LKS Bipartite* it was found that there were no complaints related to salary or payment of wages. Beside that, based on document review and interview with worker, there are no wage deduction.

6.5.3

The company has provided housing facilities for employees. Based on the results of field visits to Bumi Permai Mill, Prima Estate, Kahoi Estate and Mahakam Estate. If there are complaints related to the need for home repairs, the company has recorded and responded as in the complaint dated 11 October 2018 regarding G2 Blok K36 housing water. Related to this, the company has made repairs by water operators and assisted by maintenance employees on October 11, 2018,

and was declared completed and the complaint was closed.

Based on field observation, the company give an electricity facilities originating from the biogas plant and clean water facilities come from wells and can also buy from the village closest to the estate. In addition, the company also provides worship facilities such as mosques in each housing. Health facilities such as clinics are available at Kahoi Estate.

6.5.4

The results of visits and interviews with employees in housing that employees can easily obtain food sources with the existence of a shop in Housing, vegetable sellers and fish that come to sell in the Housing location. Employees can also buy groceries and daily necessities at the nearby village market which operates every Sunday.

Status: Comply

6.6

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

6.6.1 & 6.6.2

The company has a freedom of association policy. The document was determined by the top management (President Director) on January 2, 2011. The commitments are as follows:

- The company provides an opportunity for all workers to form trade unions that are free, open, independent, democratic, responsible and registered with the local labor force.
- The company gives freedom for every workforce to become a member of a trade union without force from any party

The company has an organization of Bipartite Cooperation Institutions and has been registered at the Office of Manpower and Transmigration with Chairman (Yusran Efendi), Deputy Chair (Kriston Harianja), Secretary (Asben Sitorus) and Members (Kahoi Estate, Bumi Permai Estate, Lembuswana Estate, Beringin Jaya Estate, Prima Estate, Mill-Bulking).

The company has documented the meeting between the *LKS Bipartite* and the company. The example, on March 8, 2019 which was attended by 34 workers. Evidence of meetings is available in the form of minutes (input, management response and conclusions) and attached photos.

Status: Comply

6.7

Children are not employed or exploited.

6.7.1

The company has circulars from HRD A23-001-00 to all unit leaders set on January 1, 2012, regarding SKU Employee Procurement.

- Receiving new permanent employees at the company tailored to the needs and those who can be accepted as permanent employees must meet the requirements set by the company.
- Prospective permanent employees age at least 18 years and a maximum of 35 years.
- Prospective employee candidates must pass the selection, interview and medical test held by the company.
- Prospective of permanent employees, who have passed the selection and medical tests are declared to be accepted as permanent employees by going through a trial period no later than 3 months from the time the permanent employees are determined in the company decree unless stipulated in a separate work agreement.
- The probation period is notified to the prospective worker and calculated as the period of employment.
- Prospective employees who have passed the trial period are appointed as permanent employees.
- Each permanent employee must get approval from General Manager.

Based on employee data at Bumi Permai Mill, Prima Estate, Kahoi Estate and Mahakam Estate as of April 2019, there are no child laborers aged 15 or 18 years. Based on field visits in the PT PMM and PT TJA areas, no child laborers were found.

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; 6.8.3

The company has a work opportunity equality policy that was approved by the President Director on February 10, 2015.

The commitments are as follows:

- Companies provide equal opportunities for every worker who gets a job and earns a decent income, and gets career opportunities, regardless of all forms of discrimination, namely race, caste, nationality, ethnicity, religion, history, gender, sexual orientation, union membership, political affiliation and age.
- The company places every workforce according to their expertise, abilities, work experience and business needs and company operations.
- Companies do not use laborers who are illegally traded or forced in any form.
- All parties, including employees, contractors, consultants and company guests are responsible for implementing this policy.

Based on the results of interviews with workers, LKS Bipartite, Manpower Agency, Gender Committees and employee registration document studies, it was found that there was no issue of worker discrimination. The workers come from different religions, sexes and tribes.

Status: Comply	
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6.9

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

6.9.1 & 6.9.2

The company has a Sexual Abuse Policy which was approved by the President Director dated January 2, 2011. The policy explains that the company strongly opposes acts of sexual harassment and is committed to creating and ensuring a work environment that is free from acts of sexual harassment. In addition, there is an SOP for Handling Sexual Harassment. No. TJA / SOP / General-06. Effective date January 1, 2011. Enacted by the President Director.

The company has a Reproductive Policy approved by the President Director dated September 2, 2013. The policy explains that the company is committed to protecting women's reproductive rights and provides a guarantee of security and protection in maintaining and carrying out the reproductive process, namely (1) Special dispensation for female workers getting menstruation, pregnancy and breastfeeding in accordance with the laws and regulations. (2) Providing education and education guidance on reproduction through health workers to workers and their families

Policies related to reproductive rights were submitted at the time of the committee's gender activities, periodic health checks and during the morning briefing.

Based on the results of interviews with female workers, daycare guards and gender committee administrators, it is known that female workers related to chemicals during pregnancy and lactation will be transferred to other jobs not related to chemicals. In addition, it was also stated that mothers who are breastfeeding are given special time to be able to breastfeed children during working hours.

6.9.3

The company has a mechanism for submitting complaints and worker complaints in the internal and external complaints SOP with No. PMM / SOP / General-05 document that came into effect January 1, 2011. The SOP contains the Purpose, Responsibility, Procedure and Documentation. Complaints are employees - write down the problems in the complaint book that are available at the Garden office - minimum 2 weeks of work in advance (in coordination with SM and GM, LegalHR) - Documentation of settlement results.

Based on the SOP, all complaints can be submitted to the management and written complaints will be recorded in the incoming mail register. There is a class that states the guarantee of the secrecy of the whistle blower and the reporting witness. To counter complaints, suggestion boxes are also provided as a means of delivering complaints.

Based on interviews with workers in the estate and mill, they know the mechanism for submitting complaints, among

others, carried out directly or through a suggestion box or writing a complaint book. In addition, there are no complaints especially related to immoral acts/sexual harassment. If there is a complaint, it will be recorded in the complaint book and a complaint resolution will be sought and the results submitted to the employee.

Status: Comply

6.10

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

6.10.1; 6.10.2; 6.10.3; & 6.10.4.

Based on the minutes of the meeting on the purchase price determination team of Planters Palm Oil Production in East Kalimantan Province in April 2019 according to the East Kalimantan Governor Decree No.525 / K.318 / 2016 dated May 19th, 2016.

The company shows CLA with plasma farmers which explain the object of the agreement, validity period, plasma construction provisions, terms of cooperation, financing, pricing, rights & obligations, sanctions to settle disputes. The agreement was signed by representatives of cooperatives and companies and was known by the Head of the village & sub-district head, Head of the Plantation Office, head of the Cooperative and District Head of the Office. Kutai Kartanegara. Cooperation contracts with cooperatives for example:

- Cooperation Agreement with *Koperasi Sawit Etam Bersama* (No. 001 / SPK / KSEB / 04/2010 dated April 16th, 2010) with a validity period until April 16th, 2040.
- Cooperation Agreement with *Koperasi Maju Membangun* (No. 001 / SPK / KOPBUNMM / 05/2010 dated May 22nd, 2010) with a validity period until May 22nd, 2040.

Interview with *Koperasi Maju Membangun Jaya*, *Koperasi Mitra Sawit mandiri*, *KSU Mitra Sejahtera Abadi*, it is known that FFB payments have been paid to each member of the Cooperative. The payment documents are explained regarding the date of payment, reference, account number, total amount paid, bank name and statement. The company has paid FFB to the Cooperative for example on April 29th, 2019.

Status: Comply

6.11

Growers and millers contribute to local sustainable development wherever appropriate.

6.11.1 & 6.11.2

The company shows that CSR realization in the 2018 period includes:

- Operational assistance for Student and ambulance buses to Benua Puhun Village on January 20, 2018.
- Administrative assistance for Benua Puhun Village on January 20, 2018.
- Release of fish seeds in the Kedang Semilis River on November 14, 2018.
- Christmas celebration funding on February 28, 2018.
- The Muara Kaman cultural festival on March 31, 2018.
- *Isra Miraj* funding on April 13, 2018.
- Assistance for the *Isra Miraj* celebration banner on April 18, 2018.

The company has empowered plasma cooperatives, by hiring as a local contractor, providing fish seeds, Palm Oil management training and others.

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 studies and field observations in the spray, harvest, and Bumi Permai Mill activities, there is no labor trade in any form. And there are no foreign workers working at PT PMM and PT TJA. In addition, there is no forced labor and contract substitution. If there is a change in the contract, there will be a notification. Workers working in the field are in accordance with the contents of the article in the agreed agreement letter.

Status: Comply

6.13
Growers and millers respect human rights
6.13.1

The company has shown a policy to respect human rights in the Corporate Social Responsibility policy adopted on April 27, 2015 by the president director. The policy describes respecting human rights and respecting race, nation, culture, religion and without forced labor, ensuring that all employees receive fair remuneration, fair management and opportunities to develop careers.

The company has demonstrated Management Policy Training at the Mahakam Estate to 111 employees. Based on the results of interviews with LKS Bipartite, gender committees and employees have no violations of human rights.

Status: Comply	
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PRINCIPLE #7 Responsible development of new plantings
7.1
A comprehensive and participatory independent social and environmental assessment is undertaken prior to establishing new plantings or operations, or expanding existing ones, and the results incorporated into planning, management and operations.
7.1.1; 7.1.2 & 7.1.3

Since ASA-4 until now there were planting of oil palm for an area of 212.33 Ha in PT PMM and 606.76 Ha in PT TJA. Planting areas are carried out in 2016-2017 are still included in the location permit and cadastral map that owned by PT TJA & PT.PMM. The company has conducted RSPO NPP on February 2013.

Environmental impact assessment for the planting area in 2016 and 2017 has been covered in the EIA documents that have been owned as explained in Criterion 5.1.

Status: Comply	
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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

The company (PT PMM and PT TJA) showed the document Semi Detailed Soil Survey Report Evans Indonesia on June 3, d. July 5, 2009 and November 24-25 2009 conducted by PT Earthline which covered PT PMM 18,207.70 ha and PT TJA 7,290.44 ha. Documents explain and present documents including land suitability maps, both physical conditions (topography and slope) and soil type. The Semi Detail Document Soil Report explains the map of soil type, topography, hydrology and soil fertility. Based on the area data statement, the area set as conservation is 1,851.64 ha

Guidelines for making drainage are contained in the Palm Oil Cultivation Guidelines, which include, among other things, that in making roads divided into making flat roads on land, making roads on swamp areas and making roads on contoured areas. To support implementation in the field, the company has made topographic maps, which are contained in soil survey documents in 2009 by PT Earthline. With maps, it can be seen which areas are bumpy and which areas are flat. This is useful for a drainage channel development strategy.

Status: Comply	
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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

Since ASA-4 until now there were planting of oil palm for an area of 212.33 Ha in PT PMM and 606.76 Ha in PT TJA. Planting areas are carried out in 2016-2017 are still included in the location permit and cadastral map that owned by PT TJA & PT.PMM

PT PMM and PT TJA has conducted environmental and social assessment prior the land clearing which explained on document of Environmental and Social Assessment of Oil Palm Developments PT PMM and PT TJA by Environmental Management & Monitoring Pty Ltd. The assessment carried out by Charlie Ross on April 2007. The results of a study

conducted by Charlie Ross in April 2007 show that the areas in PT PMM and TJA are not primary forest.

The Company has conducted a HCV Assessment to a large area that is in accordance with the location permit PT PMM and PT TJA on August 2011. According to the result of the document review and interview, the land clearing has been conducting since April 2007, but has been first conducted HCV identification before land clearing. Liability of disclosure has been sent to RSPO Compensation Team on 23 July 2014.

7.3.2; 7.3.3; 7.3.4 & 7.3.5

Since ASA-4 until now there were planting of oil palm for an area of 212.33 Ha in PT PMM and 606.76 Ha in PT TJA. Planting areas are carried out in 2016-2017 are still included in the location permit and cadastral map that owned by PT TJA & PT.PMM

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Status: Comply

7.4

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

7.4.1 & 7.4.2

Maps that identify marginal and fragile soil including slopes are found in the semi-detailed soil survey document of PT PMM and PT TJA in 2009 made by PT Earth Line on a scale of 1: 90,000; In addition there is a land suitability map of PT PMM and PT TJA with a scale of 1: 40,000; Based on a map study it can be concluded that there is no soil with a slope > 20 °. The report shows that there are also Sapric Haplohemists covering an area of 25.98% or an area of 1,893.99 ha in the PT PMM area and 19.95% or an area of 3,632.30 ha in the PT TJA area.

Based on data provided by the sustainability team of PT PMM and PT TJA, it is known that the area of peat planting for PT PMM is 1,262.88 Ha while for PT TJA it covers 668.43 Ha. Planting in marginal areas is done with additional treatment, such as in the peat area, water management and compost application for sandy areas are carried out.

Status: Comply

7.5

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

7.5.1.

Interviews with landowners in Loleng Village, Muara Kaman Hilir Village & Bunga Bunga Village, It is estimated that there were no customary rights, land in the area of the company was individual land (former cultivation). The company has compensated the land, the process by verifying the village in coordination with the residents, then coordinating, measuring, and making payments. At the time of handing over land do not coercion, residents gave up their land voluntarily. There is no use of paramilitaries during the surrender of community land.

Status: Comply

7.6

Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their free, prior and informed consent and

negotiated agreements.
7.6.1; 7.6.2; 7.6.3; 7.6.4; 7.6.5 & 7.6.6.

Interviews with landowners in Loleng Village, Muara Kaman Hilir Village & Bunga Bunga Village, It is estimated that there were no customary rights, land in the area of the company was individual land (former cultivation). The company has compensated the land, the process by verifying the village in coordination with the residents, then coordinating, measuring, and making payments. At the time of handing over land do not coercion, residents gave up their land voluntarily. There is no use of paramilitaries during the surrender of community land.

Status: Comply	
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7.7
Use of fire in the preparation of new plantings is avoided other than in specific situations, as identified in the ASEAN guidelines or other regional best practice.
7.7.1 & 7.7.2

Based on the document review, interviews with workers and management as well as information from related agencies are known that land clearing of PT PMM and PT TJA has used the zero burning method. The policy on prohibiting burning when clearing land is still the same as the previous assessment stated in the SOP. Land clearing (PMM / SOP / AGRO-02 and TJA / SOP / AGRO-02) dated January 1, 2011 describes the land clearing system without the use of fire (Zero Burning) but using a mechanical system.

Status: Comply	
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7.8
New plantation developments are designed to minimise net greenhouse gas emissions.
7.8.1 & 7.8.2.

Within the scope of the Re-certification audit, CH has performed NPP for all new planting over the year 2010. No areas with high carbon opened to plantations and CH has identified the source of greenhouse gases emission (refers to 5.6.2).

Some efforts to minimize net greenhouse gas emissions include:

- Enrich HCV with tree planting to increased uptake of carbon (carbon sequestration).
- Reduction of fossil fuels.
- The implementation of zero burning.
- Optimal utilization of biomass fuels as an energy source in mill
- Implementation of Water management systems, among others by making peat subsidence and monitoring the water surface elevation
- Dissemination of zero burning policy

Status: Comply	
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PRINCIPLE #8 Commitment to continuous improvement in key areas of activity
8.1
Growers and millers regularly monitor and review their activities and develop and implement action plans that allow demonstrable continuous improvement in key operations.
Environment Aspect

The company has conducted several continuous improvement programs, such as:

- Has installed methane capture to reduce GHG emissions
- Renewable Fuel by using a biogas for source of electricity.
- Waste reduction: utilization of shell and fiber for boiler fuel. Besides that, EFB is also used as a raw material for composting.
- The company has a program to reduce plastics by using re-chargeable water bottle (not use mineral water bottle)

The company shows a Review of the 2018 Sustainable Improvement Program such as:

1. Increasing the use of renewable fuels (biogas plants), and increasing the methane capture biogas capacity to 2.4 MW
2. Periodic health checks
3. Control of environmental pollution (monitoring water quality, air and ambient)
4. Minimize the use of plastic bottles
5. Realization of cleft lip surgery
6. Training of control of land and garden fires
7. First aid officer training in all units
8. Development of daycare centers & rations at PME

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>There is no physical handling of the products handed over to third parties, the whole process convert from FFB into CPO / PK by BPM - PT PMM. The transporter is using third parties such as:</p> <ul style="list-style-type: none"> The company shows Letter of Agreement No. PMM / BPM / 03/2019/046-Transport of Palm Kernel on March 26, 2019-April 16, 2019 between PT PMM & Surya Dharma located in Bukit Jering Village, Muara Kaman District, Kutai Kartanegara District. The second party is an individual body that provides transportation services, transportation of materials including PK. In article 10 point 9, the second party is obliged to comply with the applicable provisions, including the rules contained in the RSPO, ISPO rules and ISCC rules. This Letter of Agreement has been signed by both parties. 														
	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>No. The organization did not buying from RSPO licensed traders.</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>BPM has registered and fulfilled all supply chain requirements through the RSPO IT supply chain managing organization (RSPO IT platform or book and claim).</p> <table border="1"> <thead> <tr> <th colspan="2">Member Information</th></tr> </thead> <tbody> <tr> <td>Member Name</td><td>PT. PRIMA MITRAJAYA MANDIRI</td></tr> <tr> <td>Member ID</td><td>RSPO_PO1000001488</td></tr> <tr> <td>License ID</td><td>CB70425</td></tr> <tr> <td>Start Date</td><td>26 Juli 2018</td></tr> <tr> <td>End Date</td><td>25 Juni 2019</td></tr> <tr> <td>RSPO Membership</td><td>1-0027-06-000-00, October 08th, 2006.</td></tr> </tbody> </table>	Member Information		Member Name	PT. PRIMA MITRAJAYA MANDIRI	Member ID	RSPO_PO1000001488	License ID	CB70425	Start Date	26 Juli 2018	End Date	25 Juni 2019	RSPO Membership	1-0027-06-000-00, October 08 th , 2006.
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End Date	25 Juni 2019														
RSPO Membership	1-0027-06-000-00, October 08 th , 2006.														
	Status: Comply														
5.1.4	<p>Processing aids do not need to be included within an organization's scope of certification.</p> <p>The mill have not processing aids.</p>														
	Status: Comply														

5.2	Supply chain model				
5.2.1	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.				
	Yes, the mill has apply the supply chain model correctly, namely model MB.				
	Status: Comply				
5.2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.				
	The mill only applying one model namely model MB.				
	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.				
	<p>The SCCS procedure for Mill with document number MNL / 6.1 / 3 revision 03 effective April 12, 2017, this document describes the person in charge of SCCS consisting of Mill Manager, Assistant, Head of Administration, Laboratory Assistant, and Bulking Staff. Chain verification supply that explains about FFB Estate receipts to Mill, CPO shipments to bulking, CPO shipments to buyers, PK to buyers, Internal & External Audit, record storage, Supply chain models, contractor activities, CPO & PK sales, transaction registration, training , claims, & complaints.</p> <p>The SCCS procedure for estates with document number MNL / 5.2 / 3 revised 02 dated February 15, 2017, this document describes the requirements related to RSPO control, certified palm oil products in the supply chain, including material flows and related claims and ensures that Bumi Permai Palm Oil Estate builds and maintains an effective system to ensure compliance with RSPO supply chain certification demand systems.</p>				
	Status: Comply				
5.3.2	The site shall have a written procedure to conduct annual internal audit				
	<p>Internal audit mechanism and schedule is explained in the RSPO sustainability manual for palm oil mill (PMM/MAN-03B) clause 4.0 which mentioned that the internal audit are conducted once a year before the external ASA. It includes the compliance of traceability, mass balance report and sales reporting through the RSPO IT Platform.</p> <p>The company shows that the SCCS internal audit dated March 5-11 2019 conducted by PSQM staff found (1) SCCS 5.6.1 non-conformance that could not be shown identification documents of all buyers (name, address, quantity, certified / non-certified) and fulfilled on March 22nd, 2019 by showing identification data documents for all buyers. The internal audit has been refer to Supply Chain Requirements November 2014 revised on June 2017.</p>				
	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				
	Bumi Permai Mill implements Module E SCCS (Mass Balance), where there are fruit suppliers that do not yet have a certificate PT Putra Bongan Jaya and PT Kutai Agro Jaya. Whereas the certified estates are obtained from the nucleus estate and Cooperatives. The company sell the CPO & PK to buyer such as:				
	<table> <tr> <th>Name</th><th>Address</th></tr> <tr> <td></td><td></td></tr> </table>	Name	Address		
Name	Address				

PT LDC EAST INDONESIA	Gd Wisma 46 Kota BNI, Karet, Tanah Abang Jakarta Pusat, DKI Jakarta
PT Musim Mas	Jalan Raya Pelabuhan CPO Kabil, Nongsa Batam
PT Kutai Refinery Nusantara	Jalan Palembang Kav 35-37 Kebon Melati, Tanah Abang, Jakarta Pusat
PT WILMAR Nabati	Kawasan Medan Barat, Medan, Sumatera Utara
Status: Comply	
5.4.2	
The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents	
BPM already has SOP of handling non-conformance product / document in the document no: MNL / 6.1 / 12 valid date 17 Jan 2018. Explained in procedure that if there is any error in delivery of product then customer can complain within 1 month after product / document received.	
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.	
There is no physical handling of the products handed over to third parties, the whole process convert from FFB into CPO / PK by BPM - PT PMM. The transporter is using third parties such as:	
<ul style="list-style-type: none"> The company shows Letter of Agreement No. PMM / BPM / 03/2019/046-Transport of Palm Kernel on March 26, 2019-April 16, 2019 between PT PMM & Surya Dharma located in Bukit Jering Village, Muara Kaman District, Kutai Kartanegara District. The second party is an individual body that provides transportation services, transportation of materials including PK. In article 10 point 9, the second party is obliged to comply with the applicable provisions, including the rules contained in the RSPO, ISPO rules and ISCC rules. This Letter of Agreement has been signed by both parties. 	
Status: Comply	
5.5.2	
Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:	
<ol style="list-style-type: none"> The site has legal ownership of all input material to be included in outsourced processes; The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. 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 	
There is no physical handling of the products handed over to third parties, the whole process convert from FFB into CPO / PK by BPM - PT PMM. The transporter is using third parties such as:	
<ul style="list-style-type: none"> The company shows Letter of Agreement No. PMM / BPM / 03/2019/046-Transport of Palm Kernel on March 26, 2019-April 16, 2019 between PT PMM & Surya Dharma located in Bukit Jering Village, Muara Kaman District, Kutai Kartanegara District. The second party is an individual body that provides transportation services, transportation of materials including PK. In article 10 point 9, the second party is obliged to comply with the applicable provisions, including the rules contained in the RSPO, ISPO rules and ISCC rules. This Letter of Agreement has been signed by both parties. 	

	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.					
There is no physical handling of the products handed over to third parties, the whole process convert from FFB into CPO / PK and the product transportation is done solely by BPM - PT PMM.					
The company shows Letter of Agreements for PK transportation vehicles, such as:					
<ul style="list-style-type: none">• The company shows Letter of Agreement No. PMM / BPM / 03/2019/046-Transport of Palm Kernel on March 26, 2019-April 16, 2019 between PT PMM & Surya Dharma located in Bukit Jering Village, Muara Kaman District, Kutai Kartanegara District. The second party is an individual body that provides transportation services, transportation of materials including PK. In article 10 point 9, the second party is obliged to comply with the applicable provisions, including the rules contained in the RSPO, ISPO rules and ISCC rules. This Letter of Agreement has been signed by both parties.					
	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					
During the audit there is no new contractors.					
Yes, this will be observed in the next surveillance.					
	Status: Comply				
5.6	Sales and goods out				
5.6.1 The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form: The name and address of the buyer					
The company shows a list of buyers of CPO & PK Period 1 May 2018 - 30 April 2019 with details:					
	No.	Name	Address	Destination	Note
	1.	PT. LDC EAST INDONESIA	Gd Wisma 46 Kota BNI Lt.15 15.01;15.09; 15.10-12 Karet Tengsin, Tanah Abang Jakarta Pusat, DKI Jakarta	Balikpapan – East Borneo	Buyer CPO
	2.	PT. MUSIM MAS	Jalan Raya Pelabuhan CPO Kabil, Kabil - Nongsa, Batam	Batam	Buyer CPO
	3.	PT. KUTAI REFINERY NUSANTARA	Jl. Palembang Kav. 35-37 RT 004 RW 001 Kebon Melati, Tanah Abang, Jakarta Pusat, DKI Jakarta 10230	Balikpapan – East Borneo	Buyer CPO
	4.	PT. WILMAR NABATI INDONESIA	Gedung B&G Lantai 9, Jln. Putri Hijau No. 10 Kesawan Medan Barat, Medan, Sumatera Utara 20111	Gresik	Buyer CPO & PK
The company has inform the name, address of the seller, loading or shipment has inform in sales contract, and others. Based on shipping instructions CPO with number 02/IP/BPM/CPO/I/2019 its explained receiver, quantity, name of ship, sales contract, DO and others.					
	Status: Comply				
5.7	Registration of transactions				

5.7.1

Supply chain actors who:

- 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

BPM has registered and fulfilled all supply chain requirements through the RSPO IT supply chain managing organization (RSPO IT platform or book and claim).

Member Information	
Member Name	PT. PRIMA MITRAJAYA MANDIRI
Member ID	RSPO_PO1000001488
License ID	CB70425
Start Date	26 Juli 2018
End Date	25 Juni 2019
RSPO Membership	1-0027-06-000-00, October 08 th , 2006.

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:

- 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.

The company shows CPO & PK sales data for the period 1 May 2018 - 30 April 2019 with the following details:

Transaction ID	Transaction on Date	Buyer Reference Number	Volume Product CSPO	Volume Product CSPK	Supply Chain Model
TR-92b6a506-ce6e	30-May-18		-	1,001.57	MB
TR-08d03209-a311	9-Jul-18		-	598.43	MB
TR-d17aeb9a-82d6	9-Jul-18		-	740	MB
TR-16c01df945be	28-Aug-18		3,000.22	-	MB
TR-72e724e7-9826	17-Sep-18		-	900	MB
TR-6c2cbcd4-721c	17-Sep-18		-	600	MB
TR-c8e3975e-6667	17-Sep-18		-	676.47	MB
TR-087671fb-0936	28-Sep-18		-	2,800.53	MB
TR-1289550f-8a7c	22-Oct-18		1,000.26	-	MB
TR-c86dc08b-4b1a	21-Nov-18		-	500	MB
TR-073fa467-3871	11-Dec-18		-	900	MB
TR-f2d8b074-2a3f	20-Mar-19	9100048516	-	300.05	MB

Total			4,000.48	9,017.05	
There are any CSPO sold as conventional is 28,501.68 MT and sold as other scheme (ISCC) is 29,501.94 MT. For CSPK sold as conventional is 904.58 MT. For sold as conventional and other scheme has been removed stock in palmtrace.					
	Status: Comply				
5.8	Training				
5.8.1					
The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff					
The company shows the SCCS training program was held in February 2019, SCCS training is conducted once every 1 year.					
	Status: Comply				
5.8.2					
Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed					
The company shows a recording of the SCCS training that was held on April 26 2019 which was attended by the Mill Manager, Assistant. Transport, processes, etc.					
	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					
Yes, all records are accurate, complete and up-to-date, kept in mill office and bulking office.					
	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					
Yes, according to the company's procedure (document control and maintaining confidentiality), all records are kept for 10 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.					
FFB, CPO, & PK production period 1 May 2018 - 30 April 2019 with details:					
Production			Volume		
FFB			274,037.05		
CPO			64,995.51		
PK			13,546.60		

	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 Not applicable, since the mill only convert FFB to CPO/PK.	
	Status: Comply
5.10.2 Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate. Not applicable, since the mill only convert FFB to CPO/PK.	
	Status: Comply
5.11	Claims
5.11.1 The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims. The SCCS procedure for Mill with document number MNL / 6.1 / 3 revision 03 effective April 12, 2017, this document describes the person in charge of SCCS consisting of Mill Manager, Assistant, Head of Administration, Laboratory Assistant, and Bulking Staff. Chain verification supply that explains about FFB Estate receipts to Mill, CPO shipments to bulking, CPO shipments to buyers, PK to buyers, Internal & External Audit, record storage, Supply chain models, contractor activities, CPO & PK sales, transaction registration, training , claims, complaints, & others The SCCS procedure for estates with document number MNL / 5.2 / 3 revised 02 dated February 15, 2017, this document describes the requirements related to RSPO control, certified palm oil products in the supply chain, including material flows and related claims and ensures that Bumi Permai Palm Oil Estate builds and maintains an effective system to ensure compliance with RSPO supply chain certification demand systems.	
	Status: Comply
5.12	Complaints
5.12.1 The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints. The SCCS procedure for Mill with document number MNL / 6.1 / 3 revision 03 effective April 12, 2017, this document describes the person in charge of SCCS consisting of Mill Manager, Assistant, Head of Administration, Laboratory Assistant, and Bulking Staff. Chain verification supply that explains about FFB Estate receipts to Mill, CPO shipments to bulking, CPO shipments to buyers, PK to buyers, Internal & External Audit, record storage, Supply chain models, contractor activities, CPO & PK sales, transaction registration, training , claims, complaints & others. The SCCS procedure for estates with document number MNL / 5.2 / 3 revised 02 dated February 15, 2017, this document describes the requirements related to RSPO control, certified palm oil products in the supply chain, including material flows	

and related claims and ensures that Bumi Permai Palm Oil Estate builds and maintains an effective system to ensure compliance with RSPO supply chain certification demand systems.	
	Status: Comply
5.13	Management review
5.13.1 The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken The company has carried out management reviews every 1 year, was conducted on April 26 th , 2019.	
	Status: Comply
5.13.2 The input to management review shall include information on: <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard. • Customer feedback. • Status of preventive and corrective actions. • Follow-up actions from management reviews. • Changes that could affect the management system. • Recommendations for improvement. The company has carried out management reviews every 1 year, was conducted on April 26 th , 2019. For example: <ul style="list-style-type: none"> ▪ Sales of PK from Bumi Permai Mill directly to the buyer, corrective actions have been taken by reporting in Rahayu Bulking mass balance to be monitored for certified PK stock reports. Based on management review on April 26 th 2019 its explained related results of internal audit, status pf preventive & corrective actions, follow up actions from management review, and recommendations for improvement. <p>Sales of PK directly from the Factor must be reported in the Rahayu Bulking mass balance in order to be monitored for certified PK stock reports. PIC for reporting is Head of Administration Bumi Permai Mill and PIC for PK Sales is Head of administration Rahayu Bulking. Based on document review, Its has been describe in document mass balance Rahayu Bulking and Bumi Permai Mill its has explained in E 2.2. Data mass balance has explain transaction ID, shipping announcements, transaction date, buyer reference number, volume CSPO & CSPK and supply chain model.</p>	
	Status: Comply
5.13.3 The output from the management review shall include any decisions and actions related to: <ul style="list-style-type: none"> • Improvement of the effectiveness of the management system and its processes. • Resource needs. The company has carried out management reviews every 1 year, was conducted on April 26 th , 2019. For example: <ul style="list-style-type: none"> ▪ Sales of PK from Bumi Permai Mill directly to the buyer, corrective actions have been taken by reporting in Rahayu Bulking mass balance to be monitored for certified PK stock reports. Based on management review on April 26 th 2019 its explained related results of internal audit, status pf preventive & corrective actions, follow up actions from management review, and recommendations for improvement. <p>Sales of PK directly from the Factor must be reported in the Rahayu Bulking mass balance in order to be monitored for certified PK stock reports. PIC for reporting is Head of Administration Bumi Permai Mill and PIC for PK Sales is Head of administration Rahayu Bulking. Based on document review, Its has been describe in document mass balance Rahayu Bulking and Bumi Permai Mill its has explained in E 2.2. Data mass balance has explain transaction ID, shipping announcements, transaction date, buyer reference number, volume CSPO & CSPK and supply chain model.</p>	
	Status: Comply

3.2.2. Module E – CPO Mills: Mass Balance Requirements

Clause	(Module E) CPO Mills – Mass Balance Requirements				
E.1	Definition				
E.1.1					
Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and volume sales of RSPO certified producers. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.					
Bumi Permai Mill implements Module E SCCS (Mass Balance), where there are fruit suppliers that do not yet have a certificate PT Putra Bongan Jaya and PT Kutai Agro Jaya. Whereas the certified estates are obtained from the nucleus estate and Cooperatives.					
	Status: Comply				
E.2	Explanation				
E.2.1					
The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the CB in the public summary of the P&C certification report. This figure represents the total volume of certified palm oil product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced should then be recorded in each subsequent annual surveillance report.					
The company shows production estimates for FFB, CPO and PK with the following details:					
Description		Certificate period for ASA 4 26 June 2018 – 25 June 2019		Actual period 1 May 2018 – 31 April 2019	
FFB		282,750		274,037.05	
CSPO		66,363		64,995.51	
CSPK		13,835		13,546.60	
	Status: Comply				
E.2.2					
The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).					
BPM has been registered and fulfilled all supply chain requirements through the RSPO managing supply chain (RSPO IT platform or book and claim).					
Member Information					
Member Name		PT. PRIMA MITRAJAYA MANDIRI			
Member ID		RSPO_PO1000001488			
License ID		CB70425			
Start Date		26 July 2018			
End Date		25 June 2019			
The company shows CPO & PK sales data for the period 1 May 2018 - 30 April 2019 with the following details:					
Transaction ID	Transaction on Date	Buyer Reference Number	Volume Product CSPO	Volume Product CSPK	Supply Chain Model

TR-92b6a506-ce6e	30-May-18		-	1,001.57	MB
TR-08d03209-a311	9-Jul-18		-	598.43	MB
TR-d17aeb9a-82d6	9-Jul-18		-	740	MB
TR-16c01df945be	28-Aug-18		3,000.22	-	MB
TR-72e724e7-9826	17-Sep-18		-	900	MB
TR-6c2cbcd4-721c	17-Sep-18		-	600	MB
TR-c8e3975e-6667	17-Sep-18		-	676.47	MB
TR-087671fb-0936	28-Sep-18		-	2,800.53	MB
TR-1289550f-8a7c	22-Oct-18		1,000.26	-	MB
TR-c86dc08b-4b1a	21-Nov-18		-	500	MB
TR-073fa467-3871	11-Dec-18		-	900	MB
TR-f2d8b074-2a3f	20-Mar-19	9100048516	-	300.05	MB
Total			4,000.48	9,017.05	

There are any CSPO sold as conventional is 28,501.68 MT and sold as other scheme (ISCC) is 29,501.94 MT. For CSPK sold as conventional is 904.58 MT. For sold as conventional and other scheme has been removed stock in palmtrace.

Status: Comply

E.3 Documented procedures

E.3.1

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

- 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.**

The SCCS procedure for Mill with document number MNL / 6.1 / 3 revision 03 effective April 12, 2017, this document describes the person in charge of SCCS consisting of Mill Manager, Assistant, Head of Administration, Laboratory Assistant, and Bulking Staff. Chain verification supply that explains about FFB Estate receipts to Mill, CPO shipments to bulking, CPO shipments to buyers, PK to buyers, Internal & External Audit, record storage, Supply chain models, contractor activities, CPO & PK sales, transaction registration, training , claims, & complaints.

The SCCS procedure for estates with document number MNL / 5.2 / 3 revised 02 dated February 15, 2017, this document describes the requirements related to RSPO control, certified palm oil products in the supply chain, including material flows and related claims and ensures that Bumi Permai Palm Oil Estate builds and maintains an effective system to ensure compliance with RSPO supply chain certification demand systems.

Status: Comply

E.3.2

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

The SCCS procedure for Mill with document number MNL / 6.1 / 3 revision 03 effective April 12, 2017, this document describes the person in charge of SCCS consisting of Mill Manager, Assistant, Head of Administration, Laboratory Assistant, and Bulking Staff. Chain verification supply that explains about FFB Estate receipts to Mill, CPO shipments to bulking, CPO shipments to buyers, PK to buyers, Internal & External Audit, record storage, Supply chain models, contractor activities, CPO & PK sales, transaction registration, training , claims, & complaints.

The SCCS procedure for estates with document number MNL / 5.2 / 3 revised 02 dated February 15, 2017, this document describes the requirements related to RSPO control, certified palm oil products in the supply chain, including material flows and

related claims and ensures that Bumi Permai Palm Oil Estate builds and maintains an effective system to ensure compliance with RSPO supply chain certification demand systems.

Status: Comply

E.4 Purchasing and goods in

E.4.1

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

The company shows the documentation of FFB production come from estate Certified and Non-Certified with the following details:

Months	FFB Certified	FFB Non Certified	Note
1 May 2018 to 30 April 2019	274,037.05	12,064.03	Certified area located in Beringin Jaya Estate, Kahoi Esttae, Lembuswana Estate, Bumi Permai Estate, Prima Estate, Rahayu Estate dan Mahakam Estate. Other source: <i>Koperasi Subur Makmur, Koperasi Grenseng Indah, Koperasi Mitra Sawit Mandiri, Koperasi Maju Bangun, Koperasi Sawit Etam, Koperasi Tanah Sama, Koperasi Karya Bersama, Koperasi Mitra Sejahtera, Andy K, Gaharu Estate, Jatimas Estate, Loleng Non 1, Loleng Non 2, PT Kutai Agro Jaya, PT Putra Bongan Jaya, PT Jaya Mandiri Sukses.</i>
Total	274,037.05	12,064.03	

Status: Comply

E.4.2

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

The company shows production estimates for FFB, CPO and PK, it is known that there is overproduction for CPO & PK with CPO production of 64.995.51 MT and PK 13.546.60 MT. This become **Non-conformance No.2019.08 with the Major category.**

E.4.2 Status: Nonconformity No. 2019.08 with Major Category

E.5 Record keeping

E.5.1

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

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

	CPO production (MT)		Total	CSPO Dispatch (MT)		
	Cert	Non Cert		RSPO	Conventional	Other Scheme
Total	64,995.51	2,935.47	67,930.98	4,008.48	28,501.68	29,501.94

	PK production (MT)		Total	CSPK Dispatch (MT)		
	Cert	Non Cert		RSPO	Conventional	Other Scheme
Total	13,546.60	574.17	14,120.77	9,017.05	904.58	0

Status: Comply

3.3 Conformity Checklist of Certificate and Trademark Use

1.	Evidence of permission or approval certificate and trademark from Certification Body which submitted by Client	X or√
RC	The company didn't use logo and trademark RSPO.	√
	Status: Comply	
2.	Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of trademark Use	X or√
RC	The company didn't use logo and trademark RSPO.	√
	Status: Comply	
3.	Implementation of Certificate and Trademark is not used on product	X or√
RC	The company didn't use logo and trademark RSPO.	√
	Status: Comply	
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.	X or√
RC	The company didn't use logo and trademark RSPO.	√
	Status: Comply	

3.4 Summary of RSPO Partial Certification.

Compliance of the uncertified management units of MP Evans Group PLC 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.

MP Evans Group PLC Time Bound Plan (TBP) is explained in table 1.10. MP Evans Group PLC has sixteen (17) management units with three (3) mills. MP Evans Group PLC has informed the TBP progress, MUTU has considered that MP Evans Group PLC is complied with the RSPO requirement for TBP. The Time Bound Plan was revised and declared by MP Evans Group PLC on 17 May 2018.

MUTU has verified partial certification for un-certified unit's subsidiary of MP Evans Group PLC based on their Time Bound Plan. There are one (1) uncertified mills and six (7) uncertified estates of MP Evans Group PLC. 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 is no significant land conflicts which have not been declared above
- The company has follow RSPO requirement related to New Planting Procedure and Remediation and Compensation Procedure.
- There is no labour disputes that 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

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 developed under MP Evans Group PLC</p> <p>Auditor verification Based on the document review, there is a company internal audit that was conducted on 20 and 21 February 2017 and the positive assurance is at this table that is also been verified.</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. 	<ul style="list-style-type: none"> - PT. Simpang Kiri Plantation Indonesia. RACP is not applied for this unit because the last land clearing was conducted before November 2005. The unit does not have mill. - PT. Evans Lestari (PT.EL) has conducted HCV and SIA identification by Forestry Faculty of Institute Pertanian Bogor (IPB) on March 2013 led by Dr. Ir. Jarwadi Budi Hernowo Msc. Before land clearing, therefore the unit has no liability related to RACP. PT Evans Lestari also conducted NPP on 17 December 2013 conducted by Certification Body of Control Union. <p>Auditor verification Based on internal audit results and evidence provided (communication to RSPO on liability disclosure) the</p>

		<p>three uncertified units of:</p> <p>PT Simpang Kiri Plantation Indonesia: Last land clearing happened before November 2005 and there is no new land clearing of new planting.</p> <p>PT Evans Lestari Land clearing was conducted after November 2005 but has been first conducted HCV identification before land clearing. Liability of disclosure has been sent to RSPO Compensation Team on 23 July 2014.</p>
2.1.3	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>New planting/land clearing after 1st January 2010.</p> <p>Auditor verification Based on internal audit, documented time of land clearing and liability disclosure sent to RSPO, there is new planting/land clearing after 1st January 2010 for PT Gunung Pelawan Lestari and PT Evans Lestari but NPP has been conducted for these units. Evidence of submission to RSPO is provided and the NPP notification are at RSPO website.</p>
2.1.4	Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	<p>There is no land conflicts.</p> <p>Auditor verification Based on evidence provided, the company merely conducted planting on the area that has been compensated from the land owner by FPIC. The documentation of each land compensation/leasing is documented.</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. There is no information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries.</p> <p>Auditor verification There is no indication of labor disputes. There is no information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries and also from stakeholder consultation during 1st surveillance audit of the PT PMM.</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 Land legal process is still going on and there is a detail update progress documented by the company for each year.</p> <p>Update legal for PT Evans Lestari: the company has got plantation business permit (IUP) from Bupati Decree of Musi Rawas No. 891/KPTS/Disbun/2012 dated 12 November 2012 for 20,000 ha. It is in accordance with the scale of the company location</p>

		permit (Decree of Bupati Musi Rawas No. 578/KPTS/BPM=PTP/2012 dated 30 October 2012 for 20,000 ha). However the location permit has been expired – need further HGU process information or any other legal process.
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3.5 Identification of Findings, Corrective Action, Observations, Opportunity for Improvement and Noteworthy Positive Components.
3.5.1. Identification of Findings, Corrective Actions and Observations at ASA-4

NCR No.	:	-	Issued by	:	-
Date Issued	:	-	Time Limit	:	-
NC Grade	:	-	Date of Closing	:	-
Standard Ref. & Requirement	:	-			
Evidence observed (filled by auditor):					
-					
Non-Conformance Description (filled by auditor):					
-					
Root Cause Analysis (filled by organization audited):					
-					
Correction (filled by organization audited):					
-					
Corrective Action (filled by organization audited):					
-					
Assessor Evaluation and Conclusion (filled by auditor):					
-					
Verified by	:	-			

3.5.2. Identification of Findings, Corrective Actions and Observations at Recertification Assessment

NCR No.	: 2019.01	Issued by	: Satria Adi Putra
Date Issued	: 17 May 2019	Time Limit	: 16 August 2019
NC Grade	: Major	Date of Closing	: 12 August 2019
Standard Ref. & Requirement	: 2.1.1 Evidence of compliance with relevant laws and regulations must be available		
Evidence observed (filled by auditor): Based on document verification it is known that: <ul style="list-style-type: none">- In Kahoi Estate there are 102 PKWT workers. There is no evidence that the PKWT workers have been registered with the Department of Manpower and Transmigration, Kutai Kertanegara Regency.- In Prima Estate there are 71 PKWT workers. There is no evidence that the PKWT workers have been registered with the Department of Manpower and Transmigration, Kutai Kertanegara Regency.- At Bumi Permai Mill there are 28 PKWT workers. There is no evidence that the PKWT workers have been registered with the Department of Manpower and Transmigration, Kutai Kertanegara Regency.			
Non-Conformance Description (filled by auditor): The company has not been able to show evidence of PKWT reporting and recording in accordance with Kepmenakertrans No. 100 of 2004 concerning Provisions for the Implementation of PKWT, Article 13 that PKWT must be recorded by the employer to the agency responsible for the employment of the local regency / city no later than 7 (seven) working days from the signing.			
Root Cause Analysis (filled by organization audited): PT Prima Mitrajaya Mandiri and PT Teguh Jayaprima Abadi are not aware of any regulations relating to PKWT reporting to the relevant agencies			
Correction (filled by organization audited): Corrective actions taken by PT Prima Mitrajaya Mandiri and PT Teguh Jayaprima Abadi are: <ul style="list-style-type: none">1. Conduct an inventory of all PKWT employees in each unit2. Reporting PKWT employees to relevant agencies (evidence attached)			
Corrective Action (filled by organization audited): PKWT monitoring and reporting to the relevant agencies every month			
Assessor Evaluation and Conclusion (filled by auditor): Verification is August 12, 2019 The company has shown evidence of improvements including: <ul style="list-style-type: none">- 1 file PKWT Employee Reporting Period May 2019 - Beringin Jaya Estate PT PMM- 1 file PKWT Employee Reporting Period May 2019 - Bumi Permai Mill PT PMM- 1 file PKWT Employee Reporting Period May 2019 - Bumi Permai Estate PT PMM- 1 file PKWT Employee Reporting Period May 2019 - Kahoi Estate PT PMM- 1 file PKWT Employee Reporting Period May 2019 - Lembuswana Estate PT PMM- 1 file PKWT Employee Reporting Period May 2019 - Prima Estate PT PMM- 1 file PKWT Employee Reporting Period May 2019 - Rahayu Estate PT TJA- 1 file PKWT Employee Reporting Period May 2019 - Mahakam Estate PT TJA			

Reporting was submitted to the Head of the Manpower and Transmigration Office, Head of the Industrial Disputes Division of Kutai Kartanegara Regency on June 17, 2019.

Auditor Conclusion:

Based on the evidence of improvement shown, this nonconformity is fulfilled.

Verified by : **Satria Adi Putra**

NCR No.	: 2019.02	Issued by	: Brigitta prita
Date Issued	: 17 May 2019	Time Limit	: ASA 1.1
NC Grade	: Minor	Date of Closing	: 12 August 2019
Standard Ref. & Requirement	: 2.2.2 Legal boundaries are demonstrated clearly and maintained.		
Evidence observed (filled by auditor): <ul style="list-style-type: none"> Based on field observations in Block I 50 –I 51 Division of North Mahakam Estate; in Blcok P50 & P58, South Division of Mahakam Estate, PT TJA, it is known that there are no legal boundaries. Based on interviews with the management of the area do not yet have land use right and are still in the cadastral process. 			
Non-Conformance Description (filled by auditor): Based on the explanation above, the company has not been able to show evidence of clear boundaries in the field area.			
Root Cause Analysis (filled by organization audited): PT Teguh Jayaprima Abadi of Mahakam Estate unit, has not yet installed any boundary markers.			
Correction (filled by organization audited): <ul style="list-style-type: none"> Conduct an inventory installation of boundary markers (map attached). Installing boundary markers that have been made since the date of 13 to 25 July 2019 total of 106 markers (evidence attached). 			
Corrective Action (filled by organization audited): PT Teguh Jayaprima Abadi conducts boundary monitoring which is done once a month.			
Assessor Evaluation and Conclusion (filled by auditor): Verification, 12 August 2019. The company shows the minutes of the installation of boundary stones carried out on July 13 th , 2019 - July 25 th , 2019 as many as 75 boundary stones. There is an inventory map of boundary stones installation according to the cadastral plan covering 1,489.06 ha in Teguh Jayaprima Abadi. Based on the explanation above, this non-conformance is declared to have been fulfilled and will be observed during the next surveillance.			
Verified by	: Brigitta Prita		

NCR No.	: 2019.03	Issued by	: Haikal Ramadhan Kharismansyah
Date Issued	: 17 May 2019	Time Limit	: 16 August 2019
NC Grade	: Major	Date of Closing	: 14 August 2019
Standard Ref. & Requirement	: 4.3.4 Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place		
Evidence observed (filled by auditor):			
<ul style="list-style-type: none">• Soil suitability map of PT PMM and PT TJA states that there is land with the type of peat in the operational area of the company• PMM / MAN-12 concerning Damage Control for Biomass Land for Production effective October 1, 2017 stating:<ul style="list-style-type: none">- Peat Subsidence: Mount subsidence pole (weathered wood sticks, such as ironwood) that are stamped (scale) until they reach a stable base- Water management: can maintain a water level as high as 50 - 70 cm in the collecting duct or 40 - 60 cm on the piezometer- Regular monitoring of water level is important by installing a numerical measuring device at a strategic location and the entrance of the collecting channel. Number 0 on the peat surface that has been planted.- If the water level is > 25 cm then flow and if > 65 cm is held so that the water level returns to the recommendation limit• RSPO Manual on Best Management Practices (BMPs) for Existing Oil Palm Cultivation on Peat :<ul style="list-style-type: none">- The measurement of subsidence of peat can be done by installing a vertical hollow iron pipe with an outer diameter of about 8 cm and installed firmly into the mineral substrate. Area 2 x 2 m is maintained around the stake- Installing water level gauges at strategic locations and behind weirs. Make sure level 0 is on the peat surface planted- If the water level is > 25 cm then flow and if > 65 cm is held so that the water level returns to the recommendation limit• Based on field observation found the following facts :<ul style="list-style-type: none">- Block L39: Level 0 water stick is not on the surface of the peat- Block M41: Subsidence pole are not made of hardwood and are not perfectly embedded and are not equipped with a scale- Block H37: Point 0 is the face of the peat and the water shows the number 90 cm - But water is still flowing- Block E24: Subsidence pole made of iron pipes and equipped with a scale- Block I52: Subsidence pole made of paralon is not covered with scale / mark- Block J51: Level 0 water stick is not on the surface of the peat- Record of repairs to water level block L39 PME on 15 May 2019. Point 0 has been adjusted to the surface of the peat			
Non-Conformance Description (dilengkapi oleh auditor):			
<ol style="list-style-type: none">1. Monitoring of peatland subsidence and water management by the company has not fully referred to the RSPO Manual on Best Management Practices (BMPs) for Existing Oil Palm Cultivation on Peat and has not referred to the established procedures.2. The company has not been able to show sufficient evidence that all peat monitoring carried out has used accurate measuring instruments.			

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

There is no special officer who consistently summarizes peat management data so that the procedures have not been implemented well by the unit

Correction *(filled by organization audited):*

1. Socialization of standardization of piezometer, water level and subsidence pole on July 18, 2019 followed by GM, SM, Manager, Senior Assistant and Assistant (evidence attached)
2. Improving the installation of piezometer, water level and subsidence pole on:
 - KHE on July 30, 2019 (evidence attached)
 - PME on May 14, 2019 (evidence attached)
 - MKE on August 1, 2019 (evidence attached)

Corrective Action *(filled by organization audited):*

Monitoring piezometer and water level regularly once a week. Whereas the Stake Subsidence is observed once every year. The officer in charge is Sustainability & Certification clerk.

Assessor Evaluation and Conclusion *(filled by auditor):*
Verification on August 12, 2019

The company shows evidence of improvements in the form of:

1. Training and Socialization of Piezometer Standardization, Peat Subsidence, and Water Level Installation on July 18, 2019 conducted by the Sustainability and Certification Department, attended by 21 people from GM to Assistant to PT PMM and TJA Divisions.
2. Record of Improvement of Subsidence Pole on August 1, 2019 in blocks M - 40 to M - 43 Prima Estate (8 Unit)
3. Record of Repair of the Piezometer on August 1, 2019 on blocks M - 40 to M - 43 Prima Estate (8 Units)
4. Record of Improvement of Piezometer, Peat Subsidence, and Water Level block E24, C27, D27, F36, G36 and water level block C28.29 KKPA division and H / I 37 Central Division on August 1, 2019
5. Record of Water Level Repair for J-51 block and reprint
6. Record of Installing the Piezometer and Benchmark Subsides in block I50; 1151; and I52
7. Record of Installation of Water Level block J51

However hasnt show :

1. Sampling of observations of water level and piezometer as written (will be observed once a week)
2. Information about the actual number of water levels, subsidence pole, and location of their distribution (can be shown in the distribution map)
3. Responsible officer for monitoring peat management

In addition it needs additional information on root cause, correction, and corrective analysis. Thus the nonconformity was declared not yet fulfilled

Verification on August 14, 2019

The company shows additional evidence of improvement in the form of:

1. Weekly piezometer observations in June, July and August 2019
2. Weekly water level observations in June, July and August 2019
3. The person responsible for monitoring peat management is the sustainability & certification clerk
4. Map of the distribution of PT PMM and TJA piezometer, subsidence pole, and water level with the following details:
Kahoi Estate: 5-point piezometer; Benchmark 5-point subsidence; and 2 point water level

Prima Estate: 8-point piezometer, 8-point subsidies; and 9 point water level
Mahakam Estate: 3-point piezometer; Stake Subsidies 3 points; and 1 point water level

Based on the root causes analysis, corrections, and corrective actions the discrepancies are declared fulfilled. Implementation and consistency of the improvement plan will be OBSERVED again in the next assessment.

Verified by : **Haikal Ramadhan Kharismansyah**

NCR No.	: 2019.04	Issued by	: Trismadi N
Date Issued	: 17 May 2019	Time Limit	: 16 August 2019
NC Grade	: Major	Date of Closing	: 14 August 2019
Standard Ref. & Requirement	: 4.6.6 Storage of pesticides shall be according to recognized best practices. All pesticides containers shall be properly managed according to the existing regulations and or instructions enclosed on the containers (see criterion 5.3).		
Evidence observed (filled by auditor): The company has a procedure for handling ex-pesticide container and other agrochemical materials in document No. TJA/SOP/K3-11 and No. PMM/SOP/K3-11 dated 1 January, 2011. About the hazardous waste management. The procedure is explained as follows: <ul style="list-style-type: none">a. The former chemical containers after use shall be washed at least three times and the containers is perforated before sending to the hazardous waste store. Flushing water should be managed and used again in the spraying activity.b. Place the pesticide container in a place that has obtained license from the related agency.c. Send the pesticide container to the licensed transporter.			
Non-Conformance Description (filled by auditor): Based on field observation result in the housing complex, around the Mahakam Estate Office and child care in Mahakam Estate. There were found chemical container used for trash bins. However, not all pesticide container is managed in accordance with the procedures and regulations.			
Root Cause Analysis (filled by organization audited): Pesticide container using has not been accommodated by the procedures.			
Correction (filled by organization audited): <ul style="list-style-type: none">1. The company has recommendation letter for chemical containers usage as a trash bin from the Environmental Agency of Kutai Kartanegara Regency number 660.1/004/B.I.2/BLHD/II/2014 dated 24 February 2014.2. The hazardous waste management procedure has been revised.			
Corrective Action (filled by organization audited): The periodically monitoring of chemical containers usage as garbage bin.			
Assessor Evaluation and Conclusion (filled by auditor): Verification on 12 August 2019 The company were shown several evidences, as follows:			

1. SOP ENV-SOP08-01 dated 1 August 2019 about Hazardous Waste Management. The following explained about:
 - 1.4.5. Chemical containers should be washed with a minimum of three rinsing and the packaging is perforated before entering the hazardous waste store. Rinsing water should be collected and used again in the field.
 - 1.4.6. The utilization of chemical containers can be reused for trash bins, only if there are recommendations from the governments.
2. Environment Agency of Kutai Kartanegara Regency Letter number 660.1/004/B.I.2/BLHD/II/2014 dated 26 February 2014, addressed to PT Prima Mitrajaya Mandiri. Regarding: responses to the pesticide used drums and used oil drums. It was explained that chemical containers can be reused at the hazardous waste store located in estates as: trash bin, dirty oil reservoirs, and sand droplets.
3. Environment Agency of Kutai Kartanegara Regency Letter number 660.1/005/B.I.2/BLHD/II/2014 dated 26 February 2014, addressed to PT Teguh Jayaprima. Regarding: responses to the pesticide used drums and used oil drums. It was explained that chemical containers can be reused at the hazardous waste store located in estates as: trash bin, dirty oil reservoirs, and sand droplets.

Verification on 14 August 2019

The company were shown several evidences:

Logbook on the jerry cans used for the trash bin in each unit on April 2019, such as: (PME: 8 pcs), June 2019 (PME: 13 pcs), while KHE was not utilized for trash bins from April to June 2019.

Auditor conclusions:

Based on above explanations, this nonconformity has been closed.

Verified by	: Trismadi N
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NCR No.	: 2019.05	Issued by	: Satria Adi Putra
Date Issued	: 17 May 2019	Time Limit	: 16 August 2019
NC Grade	: Major	Date of Closing	: 15 August 2019
Standard Ref. & Requirement	: 4.7.3 Records of Occupational Safety and Health (K3) training programs (see 4.8) and Personal Protective Equipment (PPE) in accordance with the results of hazard identification and risk analysis must be available to all workers.		
Evidence observed (filled by auditor):			
(1)			
<ul style="list-style-type: none">- Based on the results of field visits and interviews with J40 Prima Estate Block, it was found that there were 2 harvest workers doing personal PPE purchases.- Based on the results of the field visit to Kahoi Estate C33 Block, it was found that there were 1 harvest worker doing personal PPE purchases.- Based on the results of a field visit to the Kahoi Estate Material Warehouse, it was found that there were no helmets and shoes stock.- Based on the results of a field visit to Blok M55 of the KKPA Division, Mahakam Estate found that there were 1 harvest worker who made personal PPE purchases.			

- The company has a Circular Letter No. 03 / SEHOOA / 10/2017 regarding PPE standards from the Head of East Kalimantan Agronomy Region Operations dated October 2, 2017 intended for all Senior Managers, Estate Managers, Assistant Heads, Assistants, Foremen of PT.PMM and TJA and S&C Department which stated, among others:
 - Point 7: All personal protective equipment that has been distributed and damaged before the replacement time will be replaced by the company on condition that it shows and returns the damaged PPE.
 - Point 11: Manager, Assistant head, Division Assistant and foreman are responsible for carrying out an inventory of the needs and procurement of appropriate PPE and monitoring use in the field.

(2)

- Based on the results of field visits and interviews with FFB transport contractor workers in Block L38, Prima Estate, it is known that workers do not use PPE (shoes and gloves).
- Risk Assessment Document Analysis of OHS Risk Assessment for the description of the work of transporting fruit from the Field Collection to the Truck / Trailer states that the control measures for the potential danger of accidents include using PPE in the form of cloth gloves, boots/work shoes).

(3)

- Based on the results of field visits and interviews with workers at the Engine Room station, it is known that workers have not been given safety shoes, while the shoes used are rubber boots.
- Risk Assessment Document Analysis of OHS Risk Assessment for work locations in the Engine Room states that control measures for potential accident hazards include PPE in the form of safety shoes, helmets and semi-leather gloves).

(4)

- Based on the results of field visits and interviews with workers at the Engine Room station, it is known that workers do not yet have Operation Licence Permit related to Lift and Production aircraft.
- Request for Training for First Class Operators (Generator) for Mahmud.
- Permenaker No. 38 of 2016 Chapter IV concerning *Penggerak Mula* (operators must be trained).

(5)

- Based on the results of a visit to the PPE storage warehouse in Prima Estate, it is known that there are several PPE lockers (for fertilizer workers). In addition it is known that there are 2 lockers with incomplete (masks and gloves).
- Based on the results of a visit to the PPE storage warehouse at Kahoi Estate, it is known that the company has provided several PPE lockers. But there is no PPE for fertilizer workers in the Central Division and KKPA.
- Based on the results of the field visit and the Daily Work Plan, there are no fertilization activities.
- IK PPE Storage (step 4) states that Save PPE to the place provided and do not take it home.

Non-Conformance Description (filled by auditor):

The company has not been able to demonstrate that the provision of PPE and OHS related training is in accordance with existing procedures and applicable laws and regulations.

Root Cause Analysis (filled by organization audited):

PT Prima Mitrajaya Mandiri and PT Teguh Jayaprima Abadi already have procedures related to OHS but have not been done properly.

Correction *(filled by organization audited):*

PT Prima Mitrajaya Mandiri and PT Teguh Jayaprima Abadi have taken corrective actions as follows:

1. Completing PPE which is in employee locker on May 16, 2019 at Kahoi Estate (evidence attached)
2. Completing PPE which is in the employee locker on May 14, 2019 at Prima Estate (evidence attached)
3. Socialization and provision of PPE to the contractor on May 15, 2019 at Prima Estate (evidence attached)
4. Socialization and provision of PPE to Mr. Mahmud on May 17, 2019 (evidence attached)
5. Providing Operator Licence Permit training to Mr. Mahmud and he has obtained a temporary decree No 3030 / PTICB / VII / 2019 on July 15-20 2019 conducted by PT Indotrain Consultant (evidence attached)

Corrective Action *(filled by organization audited):*

Monitoring PPE and OHS socialization on a regular basis to all employees of PT Prima Mitrajaya and PT Teguh Jayaprima Abadi and to provide training to steam and lift transport operators.

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

Verification is August 12, 2019

The company has shown evidence of improvements including:

- New Employee Training and Socialization Documents on behalf of M Mahmud on May 17, 2019 with materials including the submission of OHS policies, RSPO/ISPO/ISCC Principles, workers' prohibitions and the administration of PPE in the form of safety shoes (evidence has been completed in the form of photos, attendance list and minutes of PPE handover).
- Minutes of PPE at Fertilizer storage on May 16, 2019 at Kahoi Estate
- Minutes of PPE for Employees on May 14, 2019 at Prima Estate with the addition of 3 pairs of rubber gloves and 2 pairs of cloth gloves made by Field Assistant, OHS Expert and approved by the Sustainable & Certification Department Team and Estate Manager.
- Minutes of PPE handover and Training of FFB Contractors on May 15, 2019 at Prima Estate. Documentation and attendance are made by Field Assistant, OHS Expert and approved by the Estate Manager.
- Certificate No. 3030/PTICB/VII/2019 which states that workers on behalf of M. Mahmud (PT PMM) had followed the OHS guidance in the field of Steamers (Boilers) on 15-20 July 2019 and were organized by PT Indotrain Consultant. The attendance list is attached and has been known by the Manpower Supervisor of PUBT Disnakertrans of East Kalimantan Province.

Based on the evidence of improvements provided, there are still a number of things that need to be verified by the auditor team such as:

Proof of improvement in Point 1, namely:

- Based on the results of field visits and interviews at Block J40 Prima Estate, it was found that there were 2 harvest workers doing personal purchases.
- Based on the results of the field visit to Kahoi Estate C33 Block, it was found that there were 1 harvest worker doing personal purchases.
- Based on the results of a field visit to Blok M55 KKPA Division, Mahakam Estate found that there were 1 harvest workers doing personal purchases.

Is there evidence of improvement regarding the non-conformance above? Is there evidence of monitoring and outreach so that similar things do not recur? (in accordance with specified corrective actions).

Proof of improvement in Point 4, namely:

- Based on the results of field visits and interviews with workers at the Engine Room station, it is known that workers do not yet have Operator Licence Permit related to *Pesawat Angkat Angkut*.
- Request for Training for First Class Operators (Generator) for Mahmum.
- Permenaker No. 38 of 2016 Chapter IV concerning *Penggerak Mula* (operators must be trained). Has Mr M Mahmum was transferred to the Boiler station?

If so, has there been any appointment of a new operator at the Engine Room station and training has been carried out to obtain the Operator Licence Permit of the *Penggerak Mula* (Generator) in accordance with *Permenaker* No. 38 of 2016 Chapter IV concerning *Penggerak Mula*.

In addition, it is submitted on the proof of improvement (as the document attached below):

- Minutes of PPE Fertilizer storage on May 16, 2019 at Kahoi Estate
- Minutes of PPE Employee completeness on May 14, 2019 at Prima Estate with the addition of 3 pairs of rubber gloves and 2 pairs of cloth gloves made by Field Assistant, OHS Expert and approved by the Sustainable & Certification Department Team and Estate Manager.

Is there evidence of monitoring and outreach so that similar things do not recur? (in accordance with specified corrective actions).

Related to the above, **the non-conformity No. 2019.06 has not been fulfilled.**

Verification is August 14, 2019

Point 1

The company has shown the improvement documents including:

- Daily PPE inspection monitoring for harvest workers at Kahoi Estate, Mahakam Estate and Prima Estate.
- OHS Training and Use of PPE in Prima Estate (South Division) on July 19, 2019, the training was attended by 16 maintenance employees, 82 harvester/fruit picker and foremen, 12 fertilizers, 8 sprayers and foremen. Photo documentation attached.
- OHS Training and Use of PPE in Prima Estate (Central Division) on July 17, 2019, the training was attended by 12 maintenance employees, 99 harvester/fruit picker and foremen, 20 fertilizers, 15 sprayers and foremen. Photo documentation attached.
- OHS Training and Use of PPE at Prima Estate (Northern Division) on July 15, 2019, the training was attended by 12 and 16 maintenance employees, 33 harvester/fruit picker and foremen, 16 fertilizers, 11 sprayers and foremen. Photo documentation attached.
- OHS training (including the use of PPE) at the Mahakam Estate on July 12, 2019, the training was attended by 58 employees. Photo documentation attached.
- OHS Training and Use of PPE at Kahoi Estate (Central Division) on July 27, 2019, the training was attended by 12 maintenance employees, 45 harvester/fruit picker and 28 employees.
- OHS Training and Use of PPE at Kahoi Estate (North Division) on July 30, 2019, the training was attended by 10 maintenance employees, 72 harvester/fruit picker and 9 fertilizer employees.
- OHS Training and Use of PPE at Kahoi Estate (KKPA Division) on July 29, 2019, the training was attended by 24 maintenance employees, 116 harvester/fruit picker and 10 fertilization employees.

Based on the evidence of improvement given, there is still something that needs to be verified by the auditor team regarding the existence of a double document certifying the development of OHS. In repairs sent previously stated that Mr. Mahmum did training related to Boiler Operator Class I and II (including the attendance list on 15-20 July 2019). While the evidence of improvement sent on August 14, 2019 states that Mr. Mahmum was the *Penggerak Mula* Operator (the statement did not match the attendance list given previously). Please provide justification related to this matter, as well as proof of *Penggerak Mula* operator training (if there is a replacement).

Based on this, the non-conformity No.2019.05 is declared unfulfilled.

Verification is August 15, 2019.

The company has shown Certificate No. 0129 / PTICB / VIII / 2019 dated August 15, 2019 from PT Indotrain Consultant stating that Mr. M Mahmud has participated in the *Penggerak Mula* Operators of the Republic of Indonesia Ministry of Manpower, which was conducted on 15-20 July 2019. Related all evidence of corrections submitted, the non-conformity No. 2019.05 has been declared fulfilled and will be observed in the next assessment.

Verified by : Satria Adi Putra

NCR No.	: 2019.06	Issued by	: Trismadi N
Date Issued	: 17 May 2019	Time Limit	: ASA 1.1
NC Grade	: Minor	Date of Closing	: 16 August 2019
Standard Ref. & Requirement	: 5.1.3. Environment monitoring plan document, its implementation report, and the corrective plan (if non-conformance arised from the monitoring result) shall be available. This plan is reviewed on two yearly basis.		
Evidence observed (filled by auditor): The company was shows some evidence as follows: <div><div>a.</div><div>Realization report of RKL-RPL PT PMM-Mill in semester II year of 2018 has explained the management and monitoring of several impacts, including: air quality, OSH, noise, increasing odor, decreasing soil fertility, disturbing of aquatic biota, decreasing the quality of surface water, environment sanitation, increased waste water, CSR program, emergencies and public health problem.</div></div> <div><div>b.</div><div>Realization report of RKL-RPL PT PMM-Estate in semester II year of 2018 has explained the management and monitoring of several impacts, including: water quality improvement, reduction of the number and variety of biota, charity of assistance to the fisheries community, OHS disruption, decreasing the ambient quality, disruption of the communitie’s respiratory tract, and communitie’s perceptions.</div></div>			
Non-Conformance Description (filled by auditor): <div><div>a.</div><div>The RKL-RPL realization report Mill Unit not yet discussed the management and monitoring of potential fire and explotions in accordance to RKL-RPL Matrix.</div></div> <div><div>b.</div><div>In the discussion chapter of Estate Unit, there are somethings that are not yet appropriate, so the trend evaluation, critical level evaluation, and compliance evaluation are preciseless. For example:<div><div>-</div><div>Emission testing result in Bumi Permai Mill with NO2 parameters exceeding the quality standard, however it not been evaluated.</div></div><div><div>-</div><div>Ambient testing result in front of Bumi Permai Mill Office on December 2018 are written as the test result of the Housing complex of Bumi Permai Mill.</div></div><div><div>-</div><div>The naming of the river not yet according to environment documents, for example: unnamed river (supposedly Bukit Jering River) in Prima Estate and Tebelai River (supposedly Muara Kaman Tua River) in Kahoi Estate.</div></div></div></div>			
Root Cause Analysis (filled by organization audited): Weakness in the preparation of the EIA implementation report for PT Prima Mitraaya Mandiri on Semester II year of 2019.			
Correction (filled by organization audited): <div><div>1.</div><div>Revised EIA implementation report on the mill and estate of PT Prima Mitrajaya Mandiri Semeter II year of 2018.</div></div>			

2. Reporting the EIA implementation on the mill and estate of PT Prima Mitrajaya Mandiri to the relevant offices.

Corrective Action (filled by organization audited):

S&C department will ensuring preparation of EIA report in accordance with matrix, and will be conducted discussions in accordance to result of the monitoring test.

Assessor Evaluation and Conclusion (filled by auditor):

Verification on 12 August 2019

The company shows several evidence as follows:

1. Revision of the EIA implementation report of PT Prima Mitrajaya Mandiri POM in year of 2018, including:
 - SO₂ & COD emissions test results for September and December 2018 in accordance to quality standards. However there is no evaluation of boiler emission test result (NO₂ parameter) that exceeds quality standards.
 - Result of ambient air testing in front of the BPM G2 Housing are appropriate, for example: SO₂: <0.012 µg/m³; NO₂: 2.04 µg/m³; CO: 57 µg/m³; TSP: 34.92 µg/m³.
 - Result of surface water monitoring for July 2018 in the Kedang Semilis Hulu & Hilir Rivers, and also Mahakam Hulu & Hilir Rivers.
 - Discussion on the monitoring and management fire in mill; including: socialization of fire hazards, electrical installations according to standards, repairing & replacing peeling power cables, installing signboard of prohibited from igniting fires, installing adequate fire extinguisher, installing evacuation routes if there are fires in any room that could potentially cause a fire.
2. Revision of EIA implamantation report in second semester of 2018 on PT Prima Mitrajaya Mandiri-Estate, including:
 - River water quality analysis for July and November 2018 in the Tebelai River, Mahakam Hulu River, Kedang Semilis Hulu & Hilir Rivers, Keham Hulu & Hilir Rivers. However, there has not been revision of the naming of rivers, such as: Without name river (supposedly Bukit Jering River) in Prima Estate and Tebelai River (supposedly Muara Kaman Tua River) in Kahoi Estate.
3. Receipt of the revision EIA implementation report of PT PMM-Estate and PT PMM-Mill for Semester II year of 2018 to the Environment Agency of Kalimantan Timur Provice, Kutai Kartanegara Regency, and Ministry of Environment & Forestry on 20 June 2019.

Verification on 16 August 2019

The company shown overlay EIA Map and Actual river map in the field, in addition it was explained that the unknown River is the downstream from the Bukit Jering River. Whereas Tebelai River is the downstream of Muara Kaman Tua River.

Auditor conclusions:

Based on the above evidence, this nonconformity was closed. While related to the existence or condition of the Bukit Jering River and Muara Kaman Tua River on the field will be reviewed during next assessment.

Verified by : Trismadi N

NCR No.	2019.07	Issued by	Trismadi N
Date Issued	17 May 2019	Time Limit	ASA 1.1

NC Grade	:	Minor	Date of Closing	:	14 August 2019
Standard Ref. & Requirement	:	5.3.3. A documented waste management plan to avoid or reduce pollution and its implementation shall be available.			
Evidence observed (filled by auditor):					
1. The company has a procedure for hazardous waste management number PMM/SOP/K3-11 dated 2 January 2011 which describes the procedure for hazardous waste management as stipulated in the Environment Law and prevents & overcomes pollution or environment damage caused by hazardous waste.					
2. The company shows the minute of meeting infectious waste transportation on 2 April 2019, consisting of 1,021 kassa, 195 syringes, 79 ampoules, 37 underpads, and 173 hanscoen. With the weight of each medical waste: 10 Kg and sharp medical waste: 2.8 kg. Based on interview with S&C Department Staff, it was explained that medical waste was transported by PT Mitra Hijau Asia.					
3. Based on field observations at landfill, block J36, Prima Estate founded that there were three used paint cans.					
Non-Conformance Description (filled by auditor):					
1. The company has not been able to demonstrate the manifest of infectious waste collect by PT Mitra Hijau Asia.					
2. The hazardous waste procedure has not been properly implemented by the company.					
Root Cause Analysis (filled by organization audited):					
1. Hazardous waste (infectious waste) of PT PMM has not been carried out on schedule.					
2. Lack of implementation of hazardous waste management, especially paint cans.					
Correction (filled by organization audited):					
1. Revision of identification of waste sources and management documents.					
2. Socializing the hazardous waste management on each units.					
3. Attached minutes of removal of three used paint cans to the hazardous waste store.					
4. Logbook balance updated.					
Corrective Action (filled by organization audited):					
Admin of Sustainability and Certification will ensures that all waste management procedures can be carried out properly by each units.					
Assessor Evaluation and Conclusion (filled by auditor):					
Verification on 12 August 2019					
The company were shown hazardous waste manifest on behalf PT Mitra Hijau Asia Number ATO 0100567 with infectious characteristic amount 22 Kg (four item) from PT PMM dated 17 June 2019. There are also record of waste management socialization to the workers, as follows:					
a. Dated 13 July 2019 has socialized to the 64 workers in RHE.					
b. Dated 15 July 2019 has socialized to the 32 workers in RHE.					
c. Dated 29 May 2019 has socialized to the 39 workers in BJE.					
d. Dated 28 May 2019 has socialized to the 39 workers in BJE.					
e. Dated 31 May 2019 has socialized to the 70 workers in BJE.					
f. Dated 28 May 2019 has socialized to the 29 workers in BPE.					
g. Dated 15 May 2019 has socialized to the 146 workers in PME.					
h. Dated 25 May 2019 has socialized to the 17 workers in Rahayu Bulking.					
i. Dated 3 July 2019 has socialized to the 109 workers in MKE.					
Verification on 14 August 2019					

The company was shown minute of removal three paint cans and updated hazardous waste logbook/balance dated 14 May 2019.

Auditor Conclusions:

Based on above explanataions, this nonconformity has been closed.

Verified by : Trismadi N

NCR No.	: 2019.08	Issued by	: Brigitta Prita
Date Issued	: 17 May 2019	Time Limit	: 16 August 2019
NC Grade	: Major	Date of Closing	: 16 August 2019
Standard Ref. & Requirement	E.4.2 (Module E) The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.		

Evidence observed (filled by auditor):

The company shows production estimates for FFB, CPO and PK with the following details:

Description	Certificate period for ASA 4 26 June 2018 – 25 June 2019	Actual period 1 May 2018 – 30 April 2019
FFB	237,764	274,037.05
CPO	54,686	64,995.51
PK	13,077	13,546.60

Non-Conformance Description (filled by auditor):

Based on the explanation above, it is known that there is overproduction for CPO & PK with CPO production of 64.995.51 MT and PK 13.546.60 MT.

Root Cause Analysis (filled by organization audited):

Because the company using license period to production quota not actual data production for 1 year.

Correction (filled by organization audited):

Ask CB to increase production volume in palm trace.

Corrective Action (filled by organization audited):

The company has showed a reporting mechanism if the excess production is listed in the procedure Supply chain number MNL/6.1/3 valid dated on August 13th 2019. In the point 7, **Volume**. If the production volume is close to 1000 MT, the palm trace management license must report to the certification body to request an increase in the applicable palm trace license quota.

The company has showed monitoring of CSPO/CSPK production start from May 2019 until 12 August 2019 its

informs date, FFB certified (MT), FFB Non certified (MT), FFB carry forward, FFB carry forward RSPO, FFB Balance, FFB Processed, RSPO FFB Processed, (%) RSPO FFB Processed, CPO Produced, Previous CSPO percentage, CPO in Tank, PK produced, CSPK produced, Previous CSPK percentage, PK in Tank, Current CSPO percentage, CPO dispatch volume RHB, CPO in bulking, and others. Based on that explanation, Indicator No.2019.08 it's become closed and its will be verified in the next surveillance.

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

Verification, 12 August 2019.

Based on palm trace data on 12 August 2019, FFB Estate & FFB Smallholders have experienced additional production of 274,037.05 MT & CSPK of 13,835 MT. The results of the panel committee meeting Indicator E 4.2 have not been fulfilled, so the company still needs to fill in the root cause analysis, corrective and corrective actions.

Verification, 16 August 2019.

The company has showed a reporting mechanism if the excess production is listed in the procedure Supply chain number MNL/6.1/3 valid dated on August 13th 2019. In the point 7, **Volume**. If the production volume is close to 1000 MT, the palm trace management license must report to the certification body to request an increase in the applicable palm trace license quota.

The company has showed monitoring of CSPO/CSPK production start from May 2019 until 12 August 2019 its informs date, FFB certified (MT), FFB Non certified (MT), FFB carry forward, FFB carry forward RSPO, FFB Balance, FFB Processed, RSPO FFB Processed, (%) RSPO FFB Processed, CPO Produced, Previous CSPO percentage, CPO in Tank, PK produced, CSPK produced, Previous CSPK percentage, PK in Tank, Current CSPO percentage, CPO dispatch volume RHB, CPO in bulking, and others. Based on that explanation, Indicator No.2019.08 it's become closed and its will be verified in the next surveillance.

Verified by	:	Brigitta Prita
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3.5.3. Opportunity for Improvement

No.	Ref. Std.	Description Deskripsi
1	1.1.2	The company considers using all fire prevention and response reporting formats in accordance with Permentan No. 5 of 2018.
2	2.2.1	The company has the opportunity to continue the progress of legal ownership / land acquisition progress.
3	4.5.1	Progress on gupon development.

3.5.4. Noteworthy Positive Components

No	Description Deskripsi
1	The Company's commitment in implementing the principles of sustainable palm oil management.
2	Has had a Biogas Plant in an effort to reduce Greenhouse Gas Emissions.
3	Has received ISPO and ISCC certificates.
4	Human Resources (HR) that are competent in their respective sections.
5	Received the Green PROPER award from the Governor of East Kalimantan in 2018.

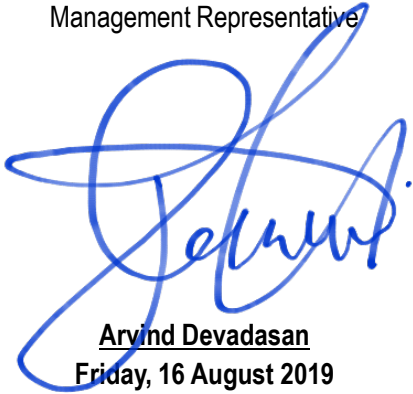
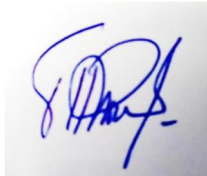
3.6 Summary of Arising Issues from Public and Auditor Verification

Public Issues (Institution/ NGO/Community)	Auditor Verification
Head of Loleng Village Based on interviews with the Head of Loleng Village are known that: <ul style="list-style-type: none"> • The company has collaborated with the Community to build smallholders so as to improve community welfare. • Companies participate in providing CSR such as compensation for orphans, educational assistance, and etc. • There has been a socialization of conservation / HCV areas, a ban on hunting wildlife. • There has been socialization of RSPO policies such as prohibition on burning, OHS policies and so on. • So far, there have never been conflicts and land disputes in the Company area. • The company shares the land used for water sources and landfill area. • Pricing is adjusted to the price of the Plantation Office of East Kalimantan Province. • So far, there have never been issues related to environmental pollution. • Every request for information or assistance is always responded to by the Company. 	The company has been good communication with Loleng Village.
Head & Secretary Mitra Sawit Mandiri Cooperative. The interview results are known: <ul style="list-style-type: none"> • Cooperatives have existed since 2010, the number of plasma farmers is in accordance with the decree numbering 940 farmers, but the realization of 1087 farmers. • Plasma area of \pm 625 ha according to measurements from Plantation Agency. • Land use title is still in the management / process stage because the cooperative considers that there is still a difference of \pm 277.7 ha which has not been added. So that the cooperative feels that it has not agreed with the area. • The price of the cooperative is adjusted to the price of the Plantation Office of East Kalimantan Province. • Payments are made every 1 month. • The company has conducted socialization such as HCV areas, protected wildlife and so on. ASPIRATION: <ul style="list-style-type: none"> • Cooperatives expect good cooperation & coordination between companies and smallholders. 	The company has empowered local communities through cooperative plasma.
Chairman of KSU Supervisor Mitra Sejahtera Abadi Cooperatives have been around since 2010, farmer members	Minutes of coordination meetings are available

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>are currently ± 214 farmers. The area of plasma that has been given is 125 ha. There are 2 plasma locations, 1 location covering 65 ha and location 2 covering 60 ha located in Bunga Jadi Village.</p> <p>In location 1 covering 65 ha, there is a plasma area that overlaps with the mine area. There is a mining area permit at that location. The price of FFB is adjusted to the price of the Provincial Plantation and payments for FFB are carried out every 4 months. The company helped empower local communities to carry out FFB transportations and building contractors. Until now, there is no Land Use Title because overlaps with mine area (PT Tanito Harun).</p>	<p>following up on the Cooperative Letter dated January 22nd, 2019 regarding support and recommendations for KSU MSA. The conclusion is that:</p> <ol style="list-style-type: none"> 1. The government of Kutai Kartanegara District supports the Cooperative in an effort to improve the welfare of the community provided that it does not conflict with the applicable Laws and Regulations. 2. The Cooperative is advised to make an MOU in advance with PT Teguh Jaya Prima regarding the above request. <p><i>Koperasi Serba Usaha Mitra Sejahtera Abadi</i> has sent a letter to the Governor of East Kalimantan Province with letter number 06 / KOP MSA / V / 2019 dated May 13th, 2019 regarding recommendations for the use of plantation land to <i>KSU Mitra Sejahtera Abadi</i>. Because since 2012 the area opened and cultivated by the Cooperative has reached an area of 203 ha and has all been planted with palm oil.</p> <p>Until now, this problem cannot be resolved.</p>
<p>Previous Landowners of Loleng Village.</p> <p>Based on interview with the company has compensated community land. The process by means of the village verification team coordinating with the residents and then identifying, measuring and making payments. At the time of land surrender was not carried out, residents gave up their land voluntarily. There is no use of paramilitaries during the surrender of community land.</p> <p>In 2018, there are 6.6 ha which have been compensated and used as additional areas for Plasma land.</p>	<p>There is no issues related land conflict and every land dispute has been compensated by the company.</p>
<p>Previous Landowners of Muara Kaman Hilir Village.</p> <p>Based on interview with the company has compensated community land. The process by means of the village verification team coordinating with the residents and then identifying, measuring and making payments. At the time of land surrender was not carried out, residents gave up their land voluntarily. There is no use of paramilitaries during the surrender of community land.</p>	<p>There is no issues related land conflict and every land dispute has been compensated by the company.</p>
<p>Previous Landowners of Bunga Jadi Village.</p> <p>Based on interview with the company has compensated community land. The process by means of the village verification team coordinating with the residents and then identifying, measuring and making payments. At the time of land</p>	<p>There is no issues related land conflict and every land dispute has been compensated by the company.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
surrender was not carried out, residents gave up their land voluntarily. There is no use of paramilitaries during the surrender of community land.	
<p>Head of Kahoi Estate, Mahakam Estate (PT TJA), Prima Estate and Rahayu Bulking.</p> <p>The committee of the gender committee consists of 4 people (Chairperson, Management of the field of women's empowerment, administrative services, and research). The reporting mechanism in the event of sexual harassment is conveyed to the chairman or management and will then be followed up. The informant is kept secret (anonymously), so far there have never been cases of sexual harassment. Policies regarding handling sexual harassment are delivered during meetings or activities of gender committees, for example during <i>Posyandu</i>, <i>yasinan</i> and so forth.</p> <p>Female employees also received H1 leave and reported to company doctors with permission for 2 days and H2 maternity leave as much as 3 months (1½ before and after).</p>	<p>The Company has provided complaint submission facilities and employee complaints and socialized to workers. This has been further explained in criteria 6.3 and 6.9.</p>
<p>Bipartite of PT TJA & PT PMM</p> <p>The establishment of Bipartite has existed since 2012, has been registered with the local Manpower Office. The number of representatives is 8 people. The complaints mechanism is submitted to the Chairperson of the Bipartite and resolved on a Bipartite. So far, every problem has been resolved by deliberation between the two parties. Meetings between companies and Bipartite are conducted regularly, usually once a month to discuss employee complaints related to work and so on.</p> <p>The establishment of PT PMM Bipartite has existed since 2010 consisting of 3 managers and members of all PT PMM employees. Meeting activities with companies are carried out every 3 months and for internal activities at least once a month. If there are complaints from employees, it is reported to the Bipartite. Until now, every problem has been resolved on both sides.</p>	<p>It has been verified on the criteria 6.6.</p>
<p>Local contractor FFB.</p> <p>Based on interview with local contractor, the company have a good cooperative relationship with the company. The payment has been paid regularly by the company. Based on agreement, PPE has been provide by contractor such as: helmet and AP shoes.</p>	<p>The company has empowered local communities as contractors</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
Plantation Agency of Kutai Kartanegara District. Based on interview with the Head of Plantation, it was found that there was no addition to the location permit, the plantation business permit. Land use title is in the cadastral process, more fully known by the National Land Agency. Assessment of plantation business has been carried out at the end of 2018 & still process, the certificate has not been issued. The last Plantation classification assessment was conducted 3 years ago with the class II (Good) category. Reports on plantation business development have been sent every 6 months and routinely delivered by the Company. Plasma and CSR reports are listed in the plantation business development report. Evidence of receipt of the report will be verified to PT PMM & TJA.	There is no change or addition related legalities. Land use title of PT TJA still in cadastral process. The <i>LKUP</i> has been report to Plantation Agency.
Environmental Agency, Kutai Kartanegara District <ul style="list-style-type: none"> - The Company already has environmental permit documents that area still valid. - Mandatory reports related environmental has been submitted regularly. - Currently there are no cases of environmental pollution. - Hazardous waste store is recommended from the environment agency to the PTSP agency. - There are no conflict with the wildlife during last year on the company operational. 	During the assessment, known that environmental permits are still valid. The Mandatory reports related environmental has been submitted regularly. There is no cases of environmental pollution. Describes in criterion 5.1, 5.2, 5.3 and 5.6
Manpower and Transmigration of Kutai Kartanegara District <ul style="list-style-type: none"> • Normatively related to regulatory compliance, licensing and reporting has been well-documented. • The Company guarantees freedom of association of employees and the company has a LKS Bipartite • The operator's license for related work on the PT PMM & PT TJA plantation has been owned by the company • Company has reported labor required to report on a regular basis. • All Employees has been covered with BPJS 	The company has follow minimum wage and has explain criterion 6.5 and The company has operators that have been certified, such as lift aircraft carrier transporters, steam ant criterion 4.7

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY
4.1	Formal Sign-off of Assessment Findings
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;"> <p>PT Prima Mitrajaya Mandiri & PT Teguh Jaya Abadi MP Evans Group PLC Management Representative</p>  <p>Arvind Devadasan Friday, 16 August 2019</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p>Trismadi Nurbayuto Friday, 16 August 2019</p> </div> </div>

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

No	Institution/NGO/ Community	Address	Phone/ Email	Form of Communicati on	Date of Contact	Response	
						Ye s	No
1	Plantation Agency	Kutai Kartanegara Regency, Kalimantan Timur Province	-	Interview by Phone	17 May 2019	√	
2	Enviroment Agency	Kutai Kartanegara Regency, Kalimantan Timur Province	-	Interview by Phone	17 May 2019	√	
3	Manpower and Transmigration	Kutai Kartanegara Regency, Kalimantan Timur Province	-	Interview by Phone	17 May 2019	√	
4	<i>Wahana Lingkungan Hidup Indonesia (Walhi)</i>	Jakarta, Indonesia	informa si@wal hi.or.id	Email	2 nd May 2019		√
5	WWF	Jakarta, Indonesia	-	Email	2 nd May 2019		√
6	<i>Aliansi Masyarakat Adat Nusantara (AMAN)</i>	Jakarta, Indonesia	rumaha man@c bn.net.i d	Email	2 nd May 2019		√
7	Sawit Watch	Jakarta, Indonesia	-	Email	2 nd May 2019		√
8	Loleng Village	Kutai Kartanegara Regency, Kalimantan Timur Province	-	Direct Interview	14-15 May 2019	√	
9	Bunga Jadi Village	Kutai Kartanegara Regency, Kalimantan Timur Province	-	Direct Interview	14-15 May 2019	√	
10	Muara Kaman Ilir Village	Kutai Kartanegara Regency, Kalimantan Timur Province	-	Direct Interview	14-15 May 2019	√	
11	Mitra Sawit Mandiri Cooperative.	Kutai Kartanegara Regency, Kalimantan Timur Province	-	Direct Interview	14-15 May 2019	√	
12	KSU Supervisor Mitra Sejahtera Abadi	Kutai Kartanegara Regency, Kalimantan Timur Province	-	Direct Interview	14-15 May 2019	√	
13	Landowners Previous of Muara Kaman Hilir Village.	Kutai Kartanegara Regency, Kalimantan Timur Province	-	Direct Interview	14-15 May 2019	√	
14	Landowners Previous of Loleng Village.	Kutai Kartanegara Regency, Kalimantan Timur Province	-	Direct Interview	14-15 May 2019	√	
15	Landowners Previous of Bunga Jadi Village. Committee Gender	Kutai Kartanegara Regency, Kalimantan Timur Province	-	Direct Interview	14-15 May 2019	√	
16	Employees Cooperative of Etam Sukses Bersama	Kutai Kartanegara Regency, Kalimantan Timur Province	-	Direct Interview	14-15 May 2019	√	
17	Bipartite Cooperation	Kutai Kartanegara Regency, Kalimantan Timur Province	-	Direct Interview	14-15 May 2019	√	
18	Local contractor FFB.	Kutai Kartanegara Regency, Kalimantan Timur Province	-	Direct Interview	14-15 May 2019	√	
18	Bumi Permai Mill :			Direct	16 May	√	

	Sterilizer – 1 worker Engine Room – 1 workers Process (Press)– 1 workers Boiler – 1 workers Kernel - 1 worker Biogas Plant – 1 worker Composting – 1 worker Land Application – 2 workers Workshop – 2 worker Warehouse Complex – 1 worker Water Threatment Plan – 1 worker Temporary Hazardous Waste – 1 worker			Interview	2019		
19	Prima Estate : Water Stick. - 1 Worker Subsidence Pole - 1 Worker Piezometer - 1 Worker Block F37 - 5 workers Harvesting - 2 harvesters HCV Operator – 1 worker Daycare – 3 workers Warehouse Complex – 1 worker			Direct Interview	14 May 2019	√	
20	Kahoi Estate : Manuring - 4 workers Harvesting - 1 harvester Water Stick. - 1 worker Piezometer and Subsidence Pole - 1 worker HCV Operator – 1 worker Daycare – 2 workers Warehouse Complex – 1 worker Clinic – 2 worker			Direct Interview	15 May 2019	√	
21	Mahakam Estate Spraying - 5 workers Harvesting – 4 harvester HCV Operator – 1 worker Daycare – 2 workers Warehouse Complex – 1 worker			Direct Interview	16 May 2019		
22	Rahayu Bulking :			Direct Interview	16 May 2019	√	

Appendix 2. Assessment Program			
DATE		13 – 18 May 2019	
PLANNED TIME	ACTUAL DURATION	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 13 May 2019			
06.55 – 10.35		Jakarta → Samarinda (Garuda GA 580)	All Auditor
11.00 – 14.00		Samarinda → PT Prima Mitrajaya Mandiri	
15.00– 16.00		Opening meeting <ul style="list-style-type: none"> Auditee Speech (Introduction of PIC, Profile of Certified Management Unit) Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification) 	All Auditor
16.00– 17.00		Documents Review <ul style="list-style-type: none"> Review of previous (Initial assessment) findings Verification of Basic Information Mill and Estate Confirmation of Time Bound Plan Review of Partial Certification 	All Auditor
Tuesday, 14 May 2019			
08.00 – 12.00		Stakeholder Consultation with affected village, cooperative of smallholder, previous land owners, and local contractor Stakeholder Consultation with relevant agencies in Kutai Kartanegara Regency by telephone Field Observation of Prima Estate <ul style="list-style-type: none"> Observation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Observation of Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management Observation of Workers Facilities (Housing, School, Worship Place, etc..) Implementation of Legal Aspect (Land Ownership, Legal Boundaries). Implementation of conservation area /HCV, POME LA. 	BRP BRP HRK SAP SAP TNB TNB
12.00 – 14.00		Break	All Auditor
14.00 – 17.00		Verification of stakeholder consultation result and field observation. Document review and completing audit checklist.	All Auditor
Wednesday, 15 May 2019			
08.00 – 12.00		Field Observation of Kahoi Estate (Own Estate & KUD Mitra Sawit Mandiri) <ul style="list-style-type: none"> Observation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) 	HRK

DATE		13 – 18 May 2019	
PLANNED TIME	ACTUAL DURATION	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
		<ul style="list-style-type: none"> Observation of Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management Observation of Workers Facilities (Housing, School, Worship Place, etc..) Implementation of Legal Aspect (Land Ownership, Legal Boundaries). Implementation of conservation area /HCV Stakeholder Consultation with gender committee, Bipartite Cooperation, worker cooperative 	SAP SAP TNB TNB BRP
12.00 – 14.00		Break	All Auditor
14.00 – 17.00		Verification of stakeholder consultation result and field observation. Document review and completing audit checklist.	All Auditor All Auditor
Thursday, 16 May 2019			
08.00 – 12.00		Field Observation of Mahakam Estate (Own Estate & KUD Mitra Sejahtera Abadi) <ul style="list-style-type: none"> Observation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Observation of Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management Observation of Workers Facilities (Housing, School, Worship Place, etc..) Implementation of Legal Aspect (Land Ownership, Legal Boundaries). Implementation of conservation area /HCV 	HRK/SAP BRP BRP TNB TNB
12.00 – 14.00		Break	All Auditor
14.00 – 17.00		Field Observation of Bumi Permai Mill <ul style="list-style-type: none"> SCCS verification Supply Chain verification (FFB Receiving, Weighbridge, FFB Sorting, Processing Activity, Despatch CPO) Observation of Chemical Storage, Hazardous Waste Storage, Fire Control Facilities Observation of Effluent Pond, Composting, Water Intake 	BRP HRK SAP TNB
Friday, 17 May 2019			
08.00 – 12.00		Document review and completing audit checklist.	All Auditor
12.00 – 15.00		Break and internal discussion by auditor team preparing for Closing Meeting	All Auditor
15.00 – 17.00		Closing Meeting: <ul style="list-style-type: none"> Presentation of audit findings (Noteworthy Positive Component, Non Conformities, OFI, Timeliness of CAR's, Conclusion)/ Comments, Responses and Questions 	All Auditor

DATE		13 – 18 May 2019	
PLANNED TIME	ACTUAL DURATION	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Saturday, 18 May 2019			
06.00 – 09.00		PT Prima Mitrajaya Mandiri → Samarinda	All Auditor
11.30 – 13.00		Samarinda → Jakarta Garuda (GA 581)	