

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

**[ ✓ ] Surveillance**

Name of Management : Kilang Sawit Tenggaroh, Felda Palm Industries Sdn Bhd subsidiary of Felda Organisation  
 Organisation : Global Ventures Holdings Bhd  
 Plantation Name : Felda Global Ventures Plantation: Ladang Tenggaroh 09; Ladang Tenggaroh 11 & Ladang Tenggaroh 13  
 Location : 81907 Kota Tinggi, Johor, Malaysia  
 Certificate Code : **MUTU-RSPO/124**  
 Date of Certificate Issue : 26 December 2018                      Date of License Issue : 26 March 2020  
 Date of Certificate Expiry : 25 December 2023                      Date of License Expiry : 25 December 2021

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-1	13 to 17 January 2020	Sandra Purba (Lead Auditor), Ebnu Holdoon Shawal & Brigitta Prita	Octo HPN Nainggolan	Ardiansyah

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-1	05 March 2020

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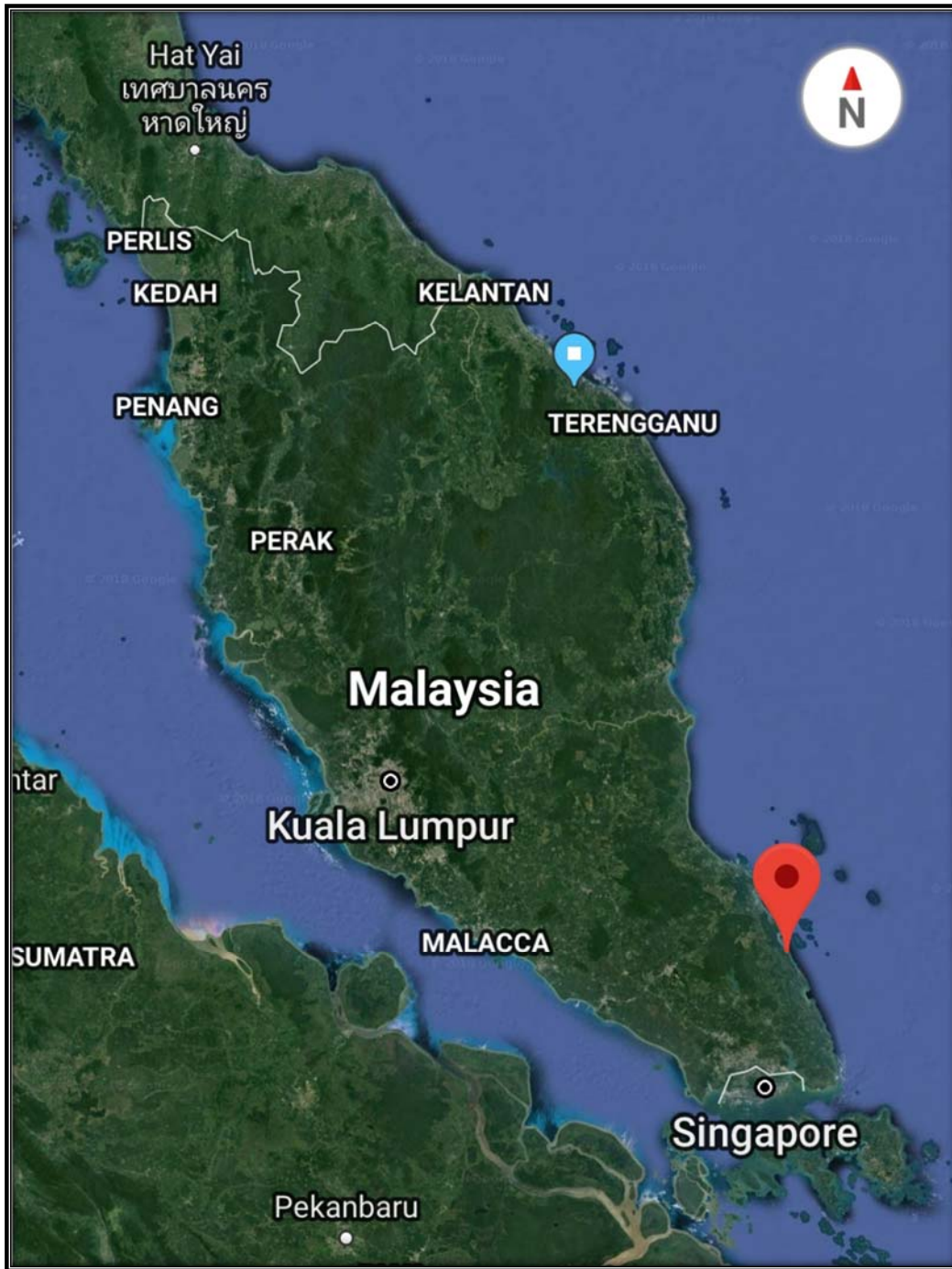
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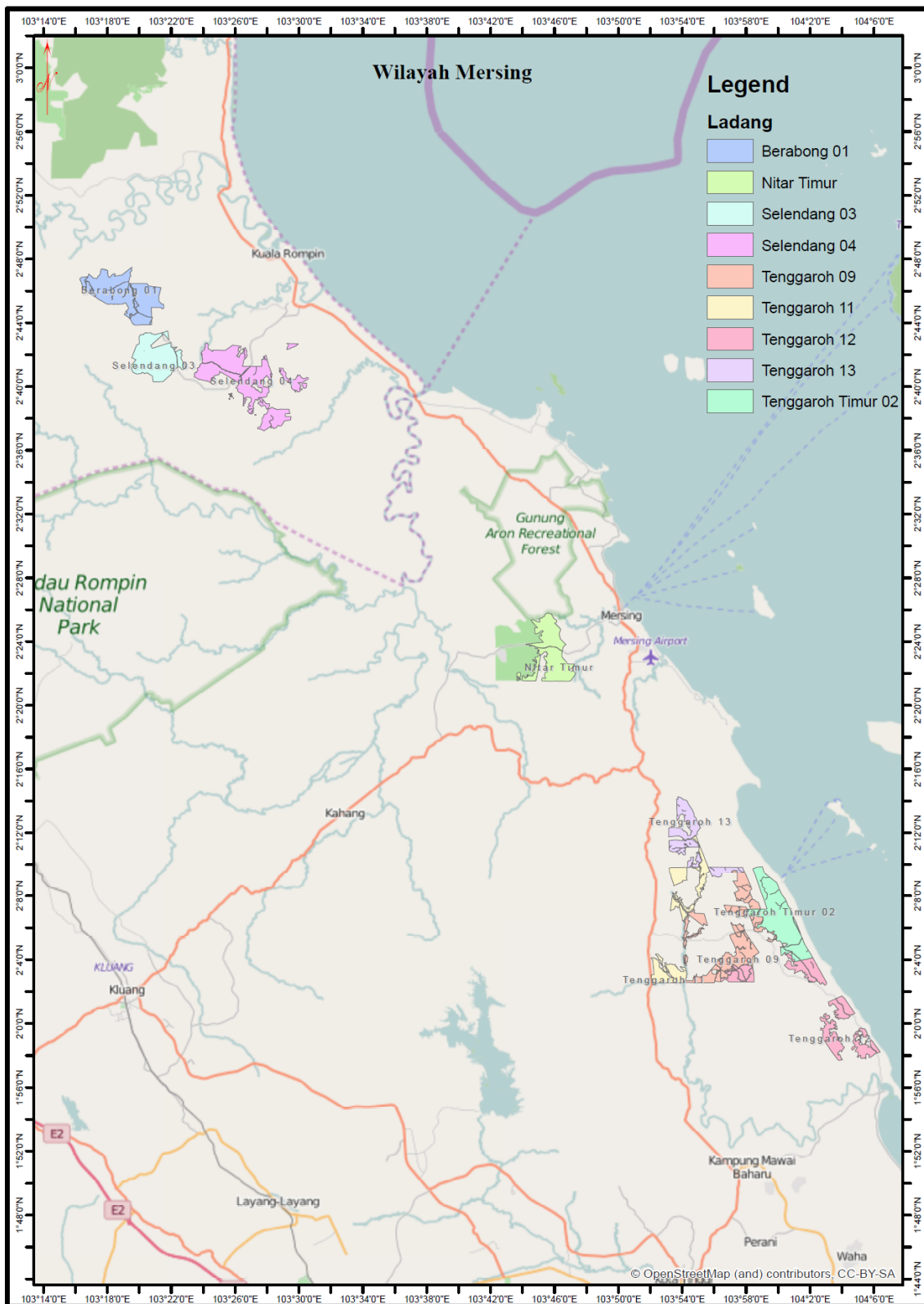
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Figure 1. Location Map of Tenggaroh



**Figure 2. Operational Map of Tenggaroh Complex.**



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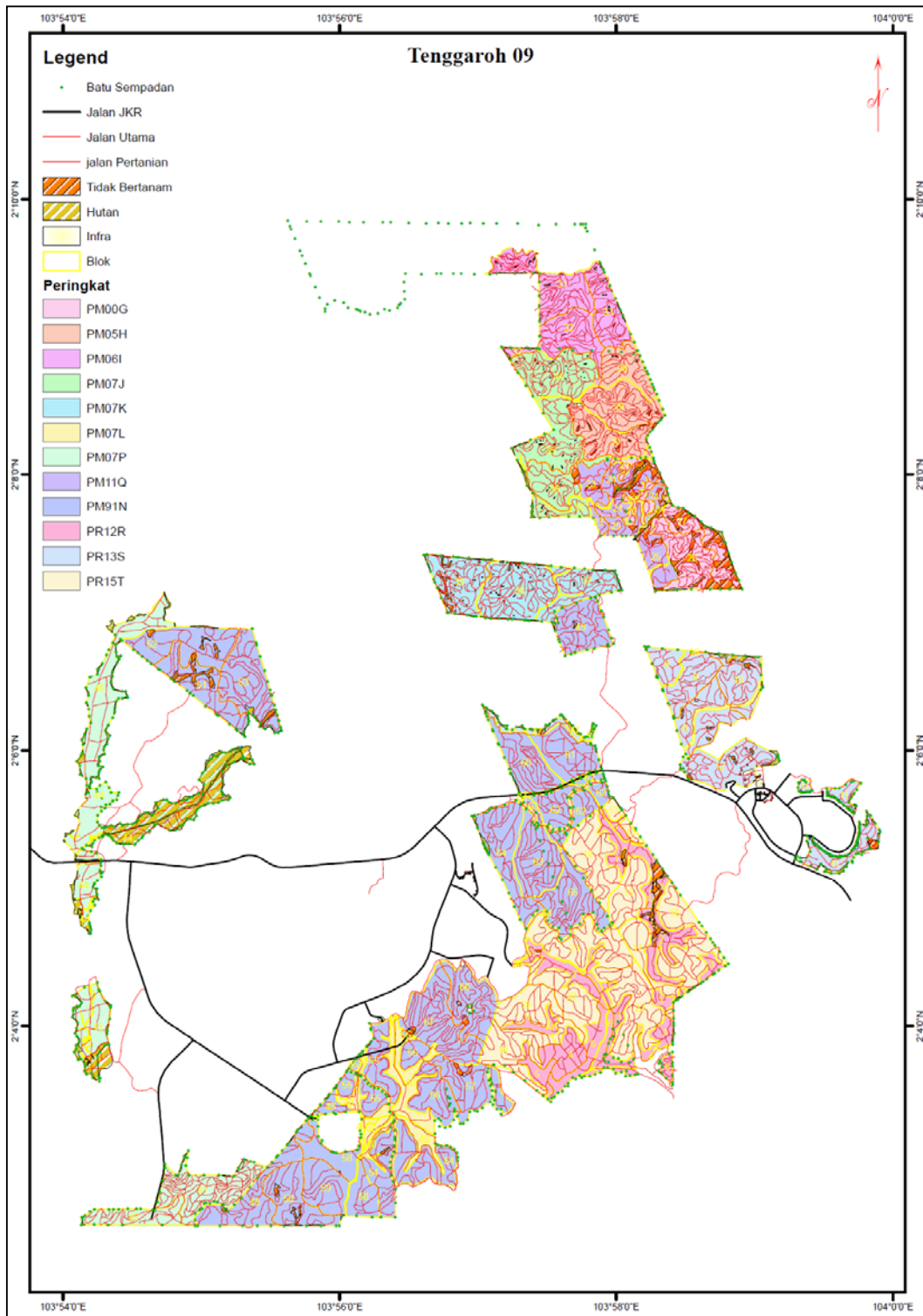




Figure 4. Operational Map of Tenggaroh 11.

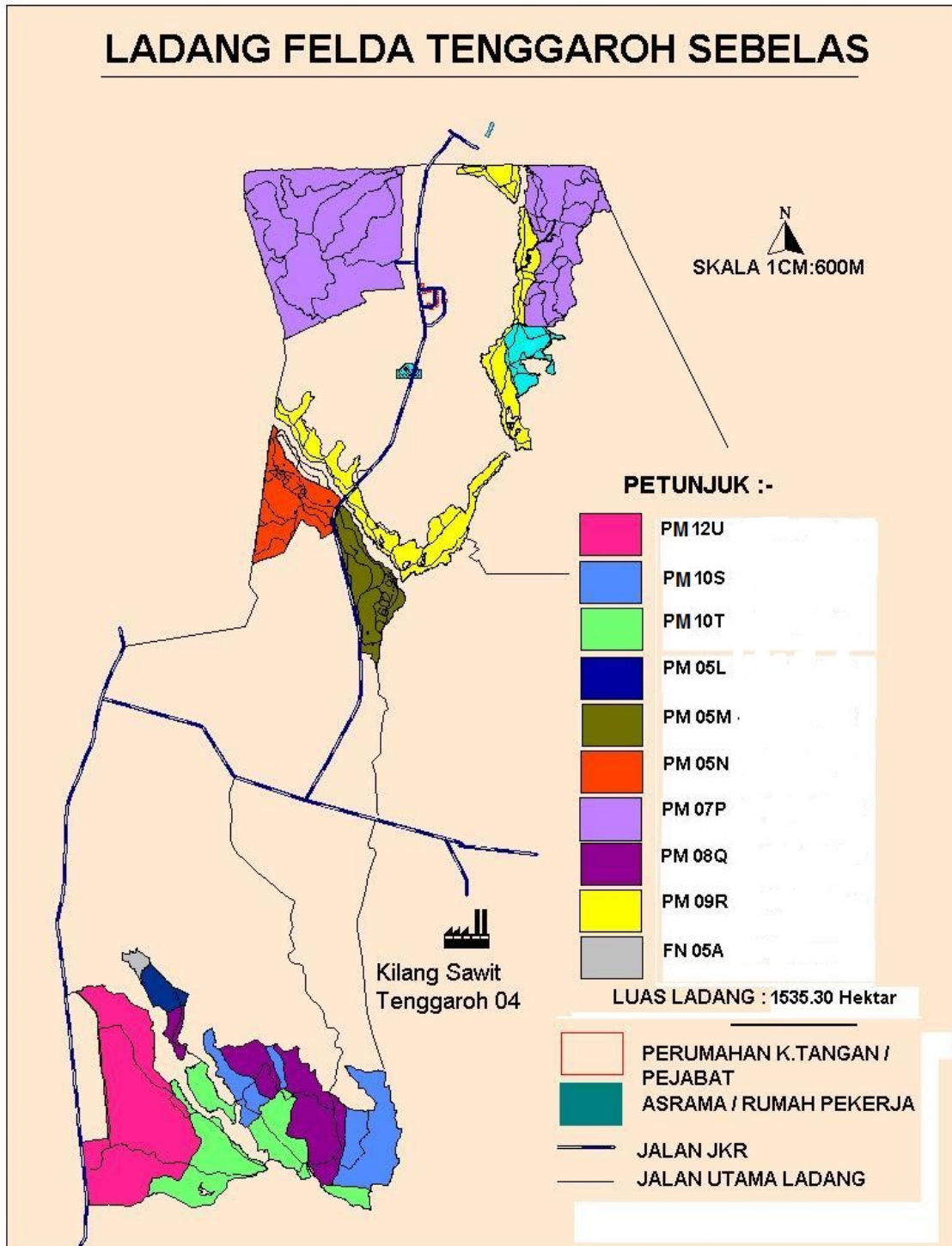
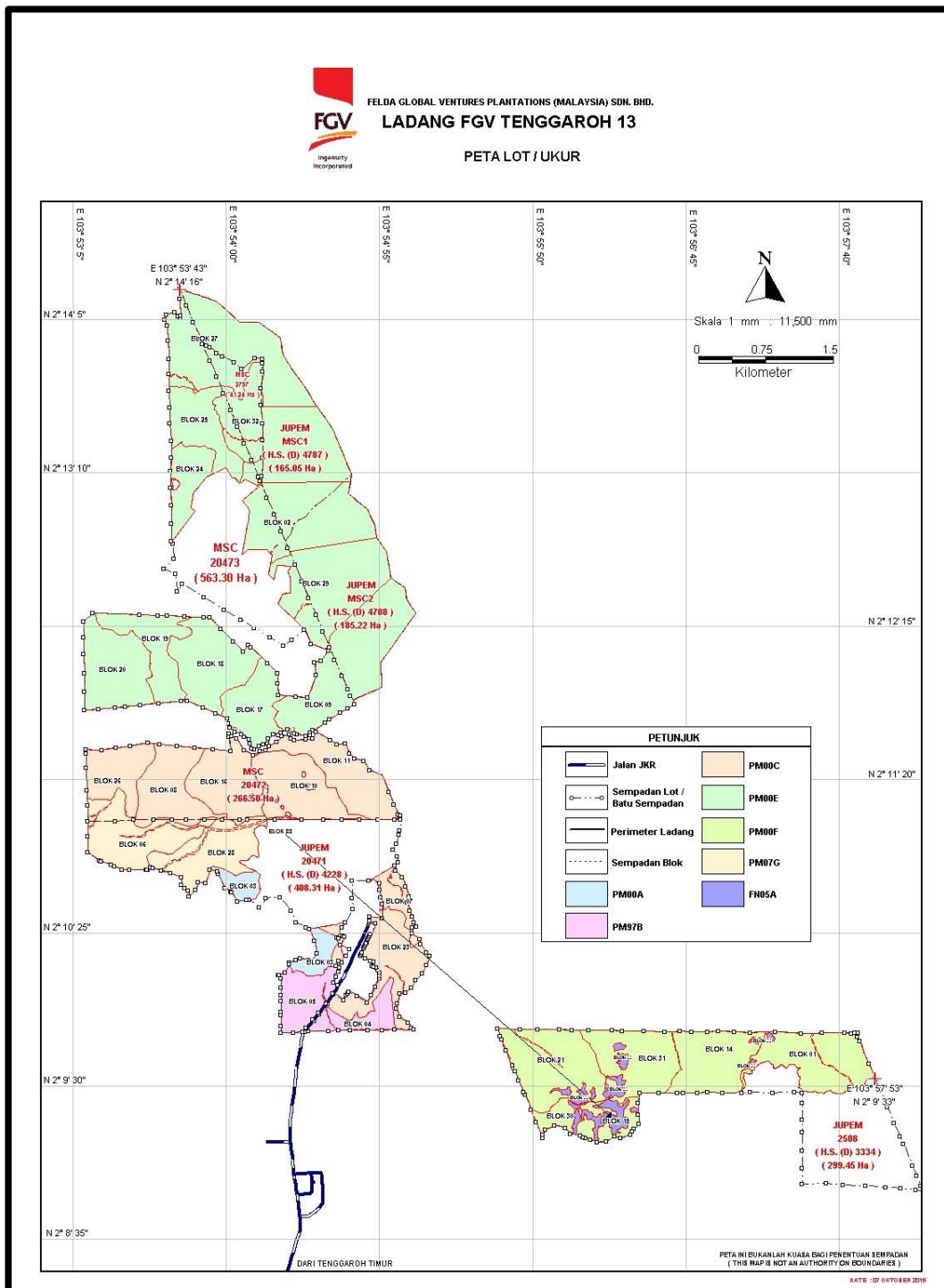


Figure 5. Operational Map of Tenggaroh 13



**Abbreviations Used**

ASA	: Annual Surveillance Assessment	P&D	: Pest and Disease
BOB	: Barn Owl Box	LD	: Lethal Dosage
BOD	: Biological Oxygen Demand	NGO	: Non-Government Organization
CB	: Certification Body		
CDD	: Unit of Certification Due Diligent	OER	: Oil Extraction Rate
CEC	: Cation Exchange Capacity	OFI	: Opportunity For Improvement
CEO	: Chief Executive Officer	OSH	: Occupational Safety and Health
CPO	: Crude Palm Oil	P&D	: Pest and Disease
EFB	: Empty Fruit Bunch	PIC	: Person in Charge
EIA	: Environmental Impact Analysis	PK	: Palm Kernel
EMP	: Environmental Management Plant	POM	: Palm Oil Mill
eRML	: <i>Estate-Rangkaian Maklumat Ladang</i> (Estate Information Connection)	POME	: Palm Oil Mill Effluent
ETL	: Economic Threshold Level	PPE	: Personal Protection Equipment
FAS	: Felda Agriculture Services Sdn. Bhd.	R&D	: Research and Development
FFB	: Fresh Fruit Bunch	RM	: Ringgit Malaysia (Malaysia currency)
FGVPM	: Felda Global Ventures Plantations Malaysia	MB	: Mass Balance
FTPSB or FTP	: Felda Technoplant Plantation Sdn. Bhd.	RSPO	: Roundtable Sustainable palm Oil
FTPM	: Felda Techno Plant Malaysia	RTE	: Rear Threatened & Endangered
GHG	: Green House Gasses	SC	: Supply Chain
GPS	: Global Position System	SCCS	: Supply Chain Certification System
HCV	: High Conservation Value	Sdn. Bhd.	: Sendirian Berhad (non-public company)
HIRADC	: Hazard Identification Risk Assessment Determining Control	SDS	: Safety Data Sheet
KER	: Kernel Extraction Rate	SED	: Department of Sustainability & Environment
LCC	: Legume Cover Crop	SIA	: Social Impact Assessment
LD	: Lethal Dosage	SKB	: <i>Sistem Komputer Berintegrasi</i> (Integrated Computer System)
NGO	: Non-Government Organization	SOP	: Standard of Procedure
OER	: Oil Extraction Rate	SPK	: <i>Surat Perjanjian Kerja</i> (Work Agreement Letter)
OFI	: Opportunity For Improvement	ST-2	: Stage - 2
OSH	: Occupational Safety and Health	WHO	: World Health Organization



<b>1.0</b>	<b>SCOPE of the CERTIFICATION ASSESSMENT</b>		
<b>1.1</b>	<b>Assessment Standard Used</b>	<ul style="list-style-type: none"> <li>Malaysia National Interpretation (MYNI) 2019 of the RSPO Principles And Criteria 2018 for Sustainable Palm Oil Production, Endorsed by the RSPO Board of Governors on 7th November 2019</li> <li>RSPO Certification System for Principles and Criteria, 14 June 2017</li> </ul>	
<b>1.2</b>	<b>Organisation Information</b>		
1.2.1	Organisation name listed in the certificate	<b>Felda Palm Industries Sdn Bhd subsidiary of Felda Global Ventures Holdings Bhd</b>	
1.2.2	Contact person	Mr. Ameer Izyanif Hamzah	
1.2.3	Organisation address and site address	RSPO Registered Company: FGV Holdings Berhad, Level 20 West Wisma FGV Jalan Raja Laut, 50350 Kuala Lumpur, Malaysia	
1.2.4	Telephone	(+ 603) – 2789 0497	
1.2.5	Fax	(+ 603) – 2789 0440	
1.2.6	E-mail	<a href="mailto:ameer.h@fgvholdings.com">ameer.h@fgvholdings.com</a>	
1.2.7	Web page address	<a href="http://www.feldaglobal.com">http://www.feldaglobal.com</a>	
1.2.8	Management Representative who completed the application for certification	Mr. Anthonius Sani	
1.2.9	Registered as RSPO member	1-0225-16-000-00, 27 December 2016	
<b>1.3</b>	<b>Type of Assessment</b>		
1.3.1	Scope of Assessment and Number of Management Unit	Palm Oil Mill and supply base: <ul style="list-style-type: none"> <li>Kilang Sawit Tenggara; supply bases: FGVP M Tenggara 9, 11 &amp; 13</li> </ul>	
1.3.2	Type of certificate	Single	
<b>1.4</b>	<b>Locations of Mill and Plantation</b>		
1.4.1	Location of Mill		
	<b>Name of Mill</b>	<b>Location</b>	<b>Coordinate</b>
			<b>Latitude</b> <b>Longitude</b>
	FGVPISB Kilang Sawit Tenggara	81907 Kota Tinggi, Johor, Malaysia	N 02° 03' 20"      E 103° 55' 53"
1.4.2	Location of Certification Scope of Supply Base		
	<b>Name of Supply Base</b>	<b>Location</b>	<b>Coordinate</b>
			<b>Latitude</b> <b>Longitude</b>
	FGVPM Tenggara 09	86810 Mersing, Johor, Malaysia	N 02° 05' 46"      E 103° 59' 02"
	FGVPM Tenggara 11	86800 Jemalung, Johor, Malaysia	N 02° 09' 00"      E 103° 54' 25"
	FGVPM Tenggara 13	86810 Mersing, Johor, Malaysia	N 02° 10' 41"      E 103° 54' 47"
<b>1.5</b>	<b>Description of Area Statement</b>		
1.5.1	Tenure		
	<ul style="list-style-type: none"> <li>State</li> </ul>	<b>6,643.24</b> Ha	

	• Community				- Ha
1.5.2	<b>Area Statement</b>				
	• Total area				6,643.24 Ha
	• Mature area				4,360.52 Ha
	• Immature area				932.99 Ha
	• Road				465.32 Ha
	• Nursery				18.60 Ha
	• Infrastructure				0.39 Ha
	• Bridges, Drainages				15.38 Ha
	• Forest Area				575.06 Ha
	• Other non-economic area				245.48 Ha
	• Other planted (Timber)				29.50 Ha
1.6	<b>Planting Year and Cycles</b>				
1.6.1	Age profile of planting year				
	Planting Year	Hectarage (Ha)			
		Tenggaroh 09	Tenggaroh 11	Tenggaroh 13	Total
	1997	0	0	49.25	49.25
	1999	66.91	0	0	66.91
	2000	0	0	988.73	988.73
	2005	116.88	165.34	0	282.22
	2006	124.77	0	0	124.77
	2007	550.91	444.83	101.22	1,096.96
	2008	0	119.01	0	119.01
	2009	0	198.7	0	198.7
	2010	0	285.66	0	285.66
	2011	82.48	0	0	82.48
	2012	214.68	246.97	0	461.65
	2013	217.49	0	0	217.49
	2015	386.69	0	0	386.69
	<b>Sub Total Mature</b>	<b>1,760.81</b>	<b>1,460.51</b>	<b>1,139.20</b>	<b>4,360.52</b>
	2017	566.82	0	0	566.82
	2018	366.17	0	0	366.17
	<b>Sub Total Immature</b>	<b>932.99</b>	<b>0</b>	<b>0</b>	<b>932.99</b>
	<b>TOTAL</b>	<b>2,693.80</b>	<b>1,460.51</b>	<b>1,139.20</b>	<b>5,293.51</b>
1.6.2	New Planting area after January 2010		- Ha		
1.6.3	Planting Cycle		1 <sup>st</sup> Cycle		
1.7	<b>Description of Mill and Supply Base</b>				
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 (%)
	Tenggaroh	54	243,367.84	57,970.51	23,82	13,832.72	5.68
	<i>*Production data source from January to December 2019.</i>						
1.7.2	Description of Certification Scope of Supply Base						
	Name of Estate	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/ year)	Supplied to Mill	
						FFB (tonnes/year)	%
	Tenggaroh 9	3,113.53	1,760.81	30,336.05	17.23	30,336.05	100
	Tenggaroh 11	1,888.12	1,460.51	25,191.67	17.25	25,191.67	100
	Tenggaroh 13	1,641.59	1,139.20	17,259.73	15.15	17,259.73	100
	<b>TOTAL</b>	<b>6,643.24</b>	<b>4,360.52</b>	<b>72,787.45</b>	<b>16.54</b>	<b>72,787.45</b>	<b>100</b>
	<i>*Production data source from January to December 2019</i>						
1.7.3	FFB description from other source						
	Name of sources/Organisation (RSPO non-certified)	Type of Organisation	number of smallholders	Production Area (Ha)	Supplied to Mill		
					FFB (tonnes/year)		
	Mahadi Bin Sulaiman	Independent Smallholder	-	-		8.36	
	Bingan Jaya Sdn Bhd	Dealer	-	-		5,228.73	
	Seng Highlands Enterprise	Dealer	-	-		1,564.94	
	Kop. Felda Tenggaroh 01	Dealer	-	-		352.02	
	Kim Ma Transport	Dealer	-	-		96.64	
	Aramijaya Sdn Bhd	Dealer	-	-		5,300.94	
	Az Iman Resources	Independent Supplier	-	-		71.02	
	Eng Huat Latex Concentrate Sdn Bhd	Dealer	-	-		1,100.40	
	Mohamad Arif Bin Mohd Ali	Independent Smallholder	-	-		169.58	
	Bon Hon Commodity Trading Sdn Bhd	Dealer	-	-		883.54	
	FTP Tenggaroh 01	Independent Supplier	-	-		30,403.53	
	FTP Tenggaroh 02	Independent Supplier	-	-		47,888.72	
	FTP SDN BHD TENGGAROH 3	Independent Supplier	-	-		154.66	
	FTP Tenggaroh 04	Independent Supplier	-	-		6,647.40	
	FTP Tenggaroh 05	Independent Supplier	-	-		25,973.74	
	FTP Tenggaroh 06	Independent Supplier	-	-		114.24	
	FTP Tenggaroh 07	Independent Supplier	-	-		7,297.19	
	FTP Tenggaroh Timur 01	Independent Supplier	-	-		16,750.19	
	FTP Tenggaroh Selatan 1	Independent Supplier	-	-		110.41	
	FELDA Tenggaroh 01	Independent Supplier	-	-		6,284.53	
	FELDA Tenggaroh 02	Independent Supplier	-	-		3,749.52	
	FELDA Tenggaroh 3	Independent Supplier	-	-		20.80	

	FELDA Tenggaroh 04	Independent Supplier	-	-	641.76			
	FELDA Tenggaroh 5	Independent Supplier	-	-	5,765.36			
	FELDA Tenggaroh 6	Independent Supplier	-	-	20.98			
	FELDA Tenggaroh 7	Independent Supplier	-	-	96.47			
	FELDA Tenggaroh Timur 01	Independent Supplier	-	-	990.72			
	FELDA Tenggaroh 02	Independent Supplier	-	-	2,894.00			
	<b>TOTAL</b>				<b>170,580.39</b>			
	<i>*Source Production Data on January to December 2019</i>							
1.7.4	Product categories	<b>FFB, CPO, PK</b>						
<b>1.8</b>	<b>Tonnage of Product</b>							
1.8.1	Past Annual Claim Certified Product	Last Year Projected Certified Volume (MT)		Last Year Actual Certified Volume (MT)				
	FFB Processed	80,850		72,787.45				
	CPO Production	17,332		15,543.60				
	Palm Kernel (PK) Production	4,505		3,831.52				
1.8.2	Product selling	Actual selling product for last year (MT)						
	Type of selling product	Actual selling product for last year (MT)						
	CSPO sold as RSPO certified product	2,319.21						
	CSPK sold as RSPO certified product	2,668.50						
	CSPO sold under other scheme	0						
	CSPK sold under other scheme	0						
	CSPO sold as conventional	12,512.49						
	CSPK sold as conventional	489.86						
1.8.3	Estimate of Certified FFB Claim							
	<b>Name of Estates</b>	<b>Total Area (Ha)</b>	<b>Planted Area (Ha)</b>	<b>FFB (tonnes/year)</b>	<b>Yield (tonnes/ha/year)</b>			
	Tenggaroh 9	3,113.53	1,760.81	31,853	18.09			
	Tenggaroh 11	1,888.12	1,460.51	26,451	18.11			
	Tenggaroh 13	1,641.59	1,139.20	18,123	15.91			
	<b>TOTAL</b>	<b>6,643.24</b>	<b>4,360.52</b>	<b>76,427</b>	<b>17.37</b>			
	<i>*Projected FFB production for 26 December 2019 to 25 December 2020</i>							
1.8.4	Estimate of Certified Palm Product Claim							
	<b>Name of Mill</b>	<b>Capacity (tonnes/ hour)</b>	<b>FFB Processed (tonnes/year)</b>	<b>CPO</b>		<b>Palm Kernel</b>		<b>Supply Chain Module</b>
				<b>Out put (tonnes)</b>	<b>Extraction (%)</b>	<b>Out put (tonnes)</b>	<b>Extraction (%)</b>	
	Tenggaroh	54	76,427	17,578	23	3,821	5	MB
	<i>*Projected CSPO and CSPK production for 26 December 2019 to 25 December 2020</i>							
<b>1.9</b>	<b>Other Certifications</b>							
	ISO 9001:2008	-						

ISO 14001: 2004	-
OHSAS 18001:2007	-
ISCC	-
Others	MUTU-MSPO/019b for Estate and MUTU-MSPO/019c for Mill.

**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				
Kota Gelanggi	2018	FASSB PPPTR; FASSB Kota Gelanggi 5/6	2018	Pos Felda Kota Gelanggi.27000 Jerantut, Pahang	Certified
Lepar Utara 6	2017	FGVPM Lepar Utara 7 FGVPM Lepar Utara 8 FGVPM Lepar Utara 9 FGVPM Lepar Utara 11	2017	Peti Surat 12 & 2020 26400 Bandar Pusat Jengka Pahang	Certified
Jengka 21	2018	FASSB Jengka 24/25	2018	Bandar Pusat Jengka, 26400 Pahang	Certified
Jengka 3	2022	Felda Settlers	2022	26400 Bandar Jengka. Pahang	-
Jengka 8	2022	Felda Settlers	2022	26400, Bandar Tun Abdul Razak Jengka, Pahang	-
Lepar Utara 4	2017	FGVPM Lepar Utara 4 FGVPM Lepar Utara 10 FGVPM Lepar Utara 14	2017	26400 Bandar Pusat Jengka, Pahang	Certified
Jengka 18	2022	Felda Settlers	2022	26400 Bandar Pusat Jengka, Jengka, Pahang	-
Padang Piol	2022	Felda Settlers	2022	27040 Jerantut, Pahang	-
Adela	2018	FGVPM Kledang 02	2018	PO Box 73, Bandar Penawar, Kota Tinggi 81930 Johor	Certified
Lok Heng	2020	Felda Settlers	2020	PO Box 55, 81907 Kota Tinggi, Johor	-
Semenchu	2020	Felda Settlers	2020	Peti Surat 63, 81907 Kota Tinggi, Johor	-
Wa Ha	2020	Felda Settlers	2020	Karung Kunci S24, 81907 Kota Tinggi, Johor	IC
Bukit Kepayang	2018	FGVPM Terapai 3	2018	28300 Triang, Pahang	IC
Bukit Mendi	2022	Felda Settlers	2022	28320 Triang, Pahang	-
Kemasul	2017	FGVPM Mengkarak 1 FGVPM Mengkarak 2	2017	28300 Triang, Pahang	Certified
Tementi	2019	FGVPM Bera Selatan 1 FGVPM Bera Selatan 4	2019	38300 Triang, Pahang	IC
Triang	2017	FGVPM Triang 2 FGVPM Triang Selatan 1 FGVPM Triang 4	2017	28300 Triang, Pahang	Certified
Belitong	2018	FASSB Ulu Belitong	2018	Peti Surat 61, 86007	Certified



			FGVPM Bukit Tongkat B		Kluang, Johor	
Bukit Besar	2020		Felda Settlers	2020	81450 Kulai, Johor	-
Kahang	2020		Felda Settlers	2020	Karung Berkunci No. 533, 86007 Kluang, Johor	-
Kulai	2020		FASSB Bukit Besar/Taib Andak	2020	Felda Taib Andak, 81000, Kulai, Johor	-
Nitar	2017		FGVPM Nitar Timur	2018	KM 13 Jalan Mersing Kluang 86800 Mersing Johor.	Certified
Penggeli	2018		FGVPM Inas Selatan	2018	Peti Surat 28, 81440 Bandar Tenggara, Johor	Certified
Lepar Hilir	2017		FGVPM Lepar Hilir 5 FGVPM Lepar Hilir 6 FGVPM Lepar Hilir 8	2017	Gambang, Pahang	Certified
Bukit Sagu	2017		FGVPM Bukit Sagu 4 FGVPM Bukit Sagu 6 FGVPM Bukit Sagu 7 FGVPM Bukit Sagu 8	2017	Peti surat 331, 26130 Kuantan, Pahang	Certified
Baiduri Ayu	2019		FGVPM Sahabat 9 FGVPM Sahabat 16 FGVPM Sahabat 55	2019	Peti Surat 29, Pos Cenderawasih, 91150 Lahad Datu, Sabah	IC
Kembara Sakti	2019		FGVPM Sahabat 30 FGVPM Sahabat 35 FGVPM Sahabat 40 FGVPM Sahabat 41 FGVPM Sahabat 42 FGVPM Sahabat 43	2019	Peti Surat 24, 91150, Cenderawasih, Lahad Datu, Sabah	IC
Mercu Puspita	2019		FGVPM Sahabat 7 FGVPM Sahabat 46 FGVPM Sahabat 48 FASSB Sahabat 6	2019	Peti Surat 29, 91150, Cenderawasih, Lahad Datu, Sabah	-
Nilam Permata	2019		FGVPM Sahabat 50 FGVPM Sahabat 51 FGVPM Sahabat 52 FGVPM Sahabat 53 FGVPM Sahabat 54	2019	Peti Surat 23, 91150, Cenderawasih, Lahad Datu, Sabah	IC
Hampanan Badai	2019		FGVPM Sahabat 23 FGVPM Sahabat 24 FGVPM Sahabat 26 FGVPM Sahabat 28 FGVPM Sahabat 31 FGVPM Sahabat 33 FGVPM Sahabat 34 FASSB Tambisan	2019	Peti Surat 25, 91150, Cenderawasih, Lahad Datu, Sabah	IC
Embara Budi	2019		FGVPM Sahabat 11 FGVPM Sahabat 12 FGVPM Sahabat 17 FGVPM Sahabat 56 FGVPM Sahabat 20 FGVPM Sahabat 21	2019	Peti Surat No. 28, 91105 Lahad Datu, Sabah	IC

			FGVPM Sahabat 22 FGVPM Sahabat 25			
Lancang Kemudi	2019		FGVPM Sahabat 10 FGVPM Sahabat 36 FGVPM Sahabat 38 FGVPM Sahabat 39 FGVPM Sahabat 44 FGVPM Sahabat 45	2019	Felda Sahabat 45, Lahad Datu, Sabah	IC
Kalabakan	2019		FGVPM Kalabakan Utara 1 FGVPM Kalabakan Tengah 1 FGVPM Kalabakan Selatan	2019	Peti Surat No. 62007, 91030 Tawau, Sabah	IC
Umas	2019		FGVPM Umas 5 FGVPM Umas 6	2019	WDT 43,91009, Tawau, Sabah	IC
Besout	2017		FGVPM Besout 6, FGVPM Besout 7	2017	35600 Sungkai, Perak	Certified
Trolak	2020		Felda Settlers	2020	Pejabat POS Sungkai, 35600 Sungkai, Perak	-
Krau	2017		FGVPM Krau 2 FGVPM Krau 4	2017	Peti Surat 17, 28700 Bentong, Pahang	Certified
Panching	2020		Felda Settlers	2020	Peti Surat 257, 25730 Kuantan, Pahang	-
Neram	2018		FGVPM Cherul 03	2018	Pejabat Pos Mini Felda Neram 1, 26160 Kuantan, Pahang	Certified
Mempaga	2021		Felda Settlers	2021	28600 Karak, Pahang	-
Chalok	2018		FGVPM Setiu 1	2018	21450 Setiu Terengganu	Certified
Sg Tenggi	2021		Felda Settlers	2021	Felda Gedangsa, 44010 Kuala Kubu Bahru, Selangor	-
Serting	2018		FGVPM Palong 17 FGVPM Palong 18 FGVPM Palong 21	2018	Bandar Baru Serting, 72109 Jempol, Negeri Sembilan	Certified
Keratong 02	2018		FGVPM Bera Selatan 3	2018	Peti Surat 28, 26900 Bandar Tun Razak, Pahang	Certified
Keratong 03	2018		FGVPM Keratong 11	2018	Peti Surat 21, 26900 Bandar Tun Razak, Pahang	Certified
Pasoh	2020		Felda Settlers	2020	72300 Simpang Pertang, Negeri Sembilan	-
Kerteh	2017		FASSB Kerteh FGVPM Semaring 01	2018	Beg berkunci No. 3, 23309 Ketengah Jaya, Terengganu	Certified
Selendang	2017		FGVPM Selendang 3 FGVPM Selendang 4 FGVPM Selendang 5 FGVPM Berabong 1	2017	Pejabat Pos Kuala Rompin, 26800 Rompin, Pahang	Certified
Selancar 2A	2020		Felda Settlers	2020	Peti Surat 98, 85007	-

					Segamat, Johor	
Selancar 2B	2017	FGVPM Selancar 6 FGVPM Selancar 8 FGVPM Selancar 9	2017		Peti Surat 98, 85007 Segamat, Johor	Certified
Jerangau Barat	2020	Felda Settlers	2020		Wakil POS Felda Jerangau, 21820 Ajil Terengganu, Terengganu	-
Jerangau Baru	2017	FGVPM Rantau Abang 1 FGVPM Rantau Abang 2 FGVPM Chador 1	2018		Wakil POS Felda Jerangau, 21820 Ajil Terengganu, Terengganu	Certified
Palong Timur	2017	FGVPM Palong Timur 4/5; FGVPM PALONG TIMUR 06	2017		Peti Surat 2, 73400 Gemas, Negeri Sembilan	Certified
Serting Hilir	2018	FGVPM Tembangau 3 FGVPM Tembangau 5 FGVPM Tembangau 6 FGVPM Tembangau 7 FGVPM Tembangau 8 FGVPM Tembangau 9 FASSB Serting Hilir	2018		72120 Bandar Baru Serting, Negeri Sembilan	Certified
Maokil	2017	FGVPM Maokil 6 FGVPM Maokil 7	2017		Jalan Kilang, Rancangan Felda Maokil, 85300 Labis, Johor	Certified
Tenggaroh	2018	FGVPM Tenggaroh 9 FGVPM Tenggaroh 11 FGVPM Tenggaroh 13	2018		86810 Jalan Jemaluang, Mersing Johor	Certified
Tenggaroh Timur	2019	FGVPM Tenggaroh 12 FGVPM Tenggaroh Timur 2	2019		Karung Berkunci No. 534, 81907 Kota Tinggi, Johor	IC
Keratong 09	2017	FGVPM Bera Selatan 5 FGVPM Bera Selatan 7 FGVPM Merchong FGVPM Keratong Timur FASSB Merchong	2017		Peti Surat 32, 26900 Bandar Tun Razak, Pahang	Certified
Kechau B	2017	FGVPM Kechau 6 FGVPM Kechau 8 FGVPM Kechau 9 FGVPM Kechau 10	2017		Peti Surat 57, 27200 Kuala Lipis, Pahang	Certified
Chiku	2018	FGVPM Ciku 4 FGVPM Ciku 8	2018		Peti Surat 29, 18300 Gua Musang, Kelantan	Certified
Aring.A	2017	FGVPM Aring 2 FGVPM Aring 3 FGVPM Aring 4 FGVPM Aring 5 FGVPM Aring 6 FGVPM Aring 8 FGVPM Aring 10 FGVPM Aring 11 FGVPM Aring 15	2017		Kelantan, MALAYSIA	Certified

	Kemahang	2020	Felda Settlers	2020	Peti Surat 35, 17507 Tanah Merah, Kelantan	-
	Tersang	2020	Felda Settlers	2020	27600 Raub, Pahang	-
	Chini 2	2020	Felda Settlers	2020	26690 Chini, Pahang	-
	Chini 3	2017	FGVPM Terapai 1 FGVPM Chini Timur 4	2018	26690 Chini, Pahang	Certified
	Sampadi	2019	FGVPM Sampadi 1 FGVPM Sampadi 3 FGVPM Sampadi 4 FGVPM Sampadi 5 FGVPM Sampadi 6	2019	Peti Surat 18, 94507 Lundu, Sarawak	Certified
	Air Tawar	2020	Felda Settlers	2020	81900 Kota Tinggi, Johor	-
	Pontian United Plantation	2019	Pontian Fico Pontian Subok Pontian Orico Pontian Pendirosa Pontian Kuril Pontian Hilco Rawajaya Sdn Bhd Blossom Plantation Sdn Bhd	2019	KM52 off Jalan Sandakan-Lahad Datu, PO Box 60525, 91114 Lahad Datu, Sabah	IC
	FGV Asian Milling Plantation	2021	Inco Setia Sdn Bhd Kronos Plantation Sdn Bhd Fortune Plantation Sdn Bhd BJ Corporatio Sdn Bhd	2021	Malaysia	-
	FGV Yapid Mas (Golden Land)	2021	15 Estate : Sri Kehuma Yapidmas AE Tanah Emas Corporation Bhd Ladang Kluang Yapidmas D Sri Mosta 1 Sri Mosta 2 Sri Mosta 3 Cepat Ringgit A Cepat Ringgit B Cepat Ringgit D Karamuak Sg Milian Sg Imbak Kuamat Sg Imbak Kuamat	2021	Malaysia	-
	PT Citra Niaga Perkasa	2021	PT Citra Niaga Perkasa Estate	2021	Indonesia	-
	PT Temila Agro Abadi	2021	PT Temila Agro Abadi Estate	2021	Indonesia	-

	FGV estate without FGV mill (FGVPM Paloh)	2021	FGVPM Paoh Estate	2021	Malaysia	-
	*FGV TBP as per 30 November 2019 develop by sustainability team					
1.10.2	<b>Progress of Associated Smallholders and Outgrowers for Certifiable Standard</b>					
	The company doesn't have smallholders scheme.					



<b>2.0</b>	<b>ASSESSMENT PROCESS</b>
<b>2.1</b>	<b>Assessment Team</b>
<b>ASA-1</b>	<p>1. <b>Sandra Purba (Lead Auditor)</b>. Graduated from Forestry Faculty Bachelor Degree, majored in Forest Product Technology. Have experience working in industrial forest company, mining and oil palm plantations company for 6 (six) years as EHS and Sustainability Assistant. Has been certified as General OHS Expert, attend and passed the several trainings of management system (OHS, environment and quality management), has been attend the training of waste management, GHG verifier and validator training, and conflict resolution and mapping training. Have been successfully passed the Indonesian Sustainable Palm Oil (ISPO) Lead Auditor training course, RSPO lead auditor training course and auditor of RSPO Next, SCCS LAT and SA8000. Involve in many audit activities of similar scheme (ISPO and MSPO) since April 2013 covering the Legal Aspect, Environmental aspect, Social Aspect, Health and Safety Aspect, conservation and Worker Welfare. On this audit, she assigned to verify land legality, land dispute, FPIC, BMP agronomy and RSPO Supply Chain.</p> <p>2. <b>Ebnu Holdoon Shawal</b>. Malaysia Citizen. He graduated with Bachelor of Civil Engineering from University Tenaga Nasional in Malaysia. He has been completed the ISO 9001: 2008 QMS Lead assessor course for RABQSA – QM 785 (Exemplar Global) certified. He has an experience regarding the safety, health and environmental standard for construction works as an engineer for 1 year. He has gone for various RSPO audit including Felda POM, FGV Palm Oil Mill, Sime Darby Palm Oil Mill and United Plantation as auditors and have total 108 man days following the auditing activities. He has gone successfully completed and pass the Lead Auditor Course by Checkmark Training and Partners and undergone MSPO Training by SGS Training for both Scheme. He had attend 5 Certification Body workshop for RSPO in Malaysia and being part of technical working group of MSPO-ACB Document by Department of Standards Malaysia. During this audit he support to communicate with local stakeholder. Verify about environmental aspect, HCV and GHG.</p> <p>3. <b>Brigitta Prita (Auditor)</b>. 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, Training Lead Auditor RSPO by Daemeter and Proforest on July 2017; Training SA 8000 by Internal Company; Training Lead Auditor SCCS by BM Trada on June 2018; and Training social &amp; worker welfare from RSPO on January 2019. She has been audit experience ISPO &amp; RSPO since April 2013 in the environmental, conservation, waste management and worker welfare aspects. During audit, has verified worker welfare aspects.</p>
<b>2.2</b>	<b>Assessment Methodology, Assessment Process and Locations of Assessment</b>
<b>2.2.1</b>	<b>Figure of person days to implement assessment</b>
<b>ASA-1</b>	<p>Number of auditors : 3 auditor          Number of days for <b>ASA-1</b> at site : 5 days          Number of working days for <b>ASA-1</b> at site: 15 Working days.</p>
<b>2.2.2</b>	<b>Assessment Process</b>
<b>ASA-1</b>	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the Tenggaroh POM, FGVPI Sdn Bhd – FGV Holdings Bhd to the requirements of Malaysia National Interpretation (MYNI) 2019 of The RSPO Principles and Criteria 2018 For Sustainable Palm Oil Production Endorsed by the RSPO Board of Governors on 7<sup>th</sup> November 2019 and RSPO Certification System for Principles and Criteria, 14 June 2017.</p> <p>The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or</p>

substances from required documents; (2) *interview*, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site.

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

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

During the audit on January 13, 2020 management representative who join the opening meeting such as Mill Manager, Estate Manager, Assistants Manager, Staff, Sustainability of Head Office, EHS Manager, Sustainability Manager, staff, and others. The auditee has prepared the documents well. Stakeholders has given information to auditor very well. The distance from KLIA airport to Kota Bukit Tinggi is approximately 4 - 5 hours by car. The location of the hotel Kota Bukit Tinggi to the audit location is around 45 minutes until 1 hour.

The assessment program please find Appendix 2.

2.2.3	<b>Locations of Assessment</b>
ASA-1	<p><b>Since the supply bases of KKS Tenggaroh only three (3) estates, the field visit are done to all estates and mill. Tenggaroh Mill.</b></p> <ul style="list-style-type: none"> <li>• <b>Store Room Lubricant</b> – sighted the SDS available in th store room,. Fire extinguisher available. Bund and maintaining the spillage observed. Spill kit available</li> <li>• <b>Scheduled waste store.</b> – Proper built in store sighted. Proper documentation sighted. Proper on the labelling and handling material by competence person.</li> <li>• <b>Kernel bunker Oil</b> – spillage of oil observed. 2 kernel oil bunker visited. Sighted the danger warning around the area.</li> <li>• <b>EFB area location</b> - during the visits leachate from the EFB sighted and run off the drainage. Proper maintaining and handling material and disposal needed.</li> <li>• <b>Kernel plant area</b> – sighted the labelling. Handling of material by competent person. signboard of noise level observed as per monitoring</li> <li>• <b>Sump treatment</b> – Monsoon drain visited. Repairing the sump on progress. 2 sump available in the estate – Monsoon drain no. 1 and 2.</li> <li>• <b>Grading, (4 local workers).</b> Interview with workers related activity, OHS, wages and others.</li> <li>• <b>Boiler Station.</b> Interview related activity, OHS, wages, PPE and others.</li> <li>• <b>Sterilizer station.</b> Interview related activity, OHS, wages, PPE and others.</li> <li>• <b>Engine room.</b> Interview related activity, OHS, wages, PPE and others.</li> <li>• <b>Kernel station.</b> Interview related activity, OHS, wages, PPE and others</li> <li>• <b>Security and WB station.</b> Observation and interview related to SCC implementation</li> </ul> <p><b>General facility and store in Tenggaroh 9,11,13</b></p> <ul style="list-style-type: none"> <li>• <b>Chemical Store</b> Field observation at FGV Tenggaroh ESATES visited. Sighted a proper chemical rack including the safety data sheet available. The competence person that in charge of the store been interviewed. Clear understanding of the workers knowledge related to safety, and material handling verified. Pesticides classification available Class 3 (<i>Acephate</i>) and 4 available and signboard including display and warning signage been displayed outside the store chemical room. Sighted the symbol and warning of pregnant woman and breastfeeding can't enter the premises</li> <li>• <b>Store Workshop.</b> Workshop at the estates sampling visited. Sighted the workshop had conducted the 5 S system in order to arrange the tools and operation. The workshop foreman been interviewed and they understand very well related to workshop operation company policy. First Aid kit available and updated by Safety Health Officer and safety signage displayed. Proper spill kit available and oil trap sump had been installed in the workshop to trap the oil before the water been discharged.</li> <li>• <b>Triple Rinses Area and chemical mixing.</b> Triple rinse store available inside Estate. The Scheduled waste store for the had been plan to be centralized at FGVPM Tenggaroh 13. The plan sighted and budget allocated by FGVPM. The competence person which is the Assistant manager of the estate had been send to the EIMAS Training to get the competence license by DOE. Future centralized area of scheduled waste area set up in</li> </ul>

Tenggaroh 13. Sighted the proper handling and disposal of the triple rinsed container to registered collector and consignment note available. The store been properly build up to contain the triple rinsed produce from the estate and sump container observed. No leakage sighted and proper maintenance of store observed.

- **Housing Area of FGV Tenggaroh 9,11,13** : housing area visited. New improvement observed compare to last year at all housing area of FGV estate. Budget allocated for the house repairing amounted RM 300,0000.00. New bed, mats, locker room, sliding tray under the bed, new toilet repair, and sighted also the Lestari Housing for the FGV future house in development for FGV Tenggaroh 9, 11 and 13. Based on the observation and interview each house have 3 workers / maximum 4 workers in the house. Proper electricity supply and clean water available. Sighted the first aid kit available, fire extinguisher and the *Peti Aduan* for the workers to make the complaint. 3 workers from each estate interviewed comprising the foreign workers [Indonesia and India= total 9] and 6 local workers in total being interviewed and cross checking. The workers kept the passport in the estate office as per procedure.
- **Fire Fighting Facilities.** Firefighting system available at the mill, diesel tank, storage area, housing area, and water treatment plant. Sighted the training been made by the estate and mill management related to fire fighter operation by BOMBA Malaysia.
- **Fertilizer store.** Fertilizer warehouse visited in each Estate. Sighted proper stacking fertilizer in the estate however during the audit, the manuring cycled passed. Proper store room fertilizer sighted, covered and ventilated. Sighted the SDS for each fertilizer available.

**Tenggaroh 9 Estate.**

- **Pesticide applicators, Block 13 S,** Interview with 5 workers (2 India and 3 Bangladesh) related management of pesticide, training, workers welfare, PPE and etc.
- **Legally border number 787 Block 28.** Observation related management of legally border.
- **Fertilizer applicators, Block 16,** Interview with 1 foreman and 3 workers from Indonesia related management of fertilizer, training, workers welfare, PPE and etc.
- **Harvesting area, Block 46/07,** Interview with 12 harvesters (1 India, 5 Bangladesh and 6 Indonesia) related harvesting activity, PPE and etc.

**Tenggaroh 11.**

- **Harvesting area, Block 05.** 1 Harvester from Indonesia and 1 foreman, related harvesting activity, PPE and etc.
- **Pesticide applicators, Block 3 PM05.** 3 Pesticide applicators from Bangladesh, related management of pesticide, training, workers welfare, PPE and etc.
- **Legally border number 207 Block 5 field P07.** Observation related management of legally border.

**Tenggaroh 13.**

- **Harvesting area, Blok 10/11 Field PM OOC.** Interview with harvester (2 Bangladesh and 1 Indonesian), related harvesting activity, PPE and etc.
- **Manual workers or (AM), Blok 19/OOI.** Interview with 7 workers (Local Malaysia), related management of pesticide, training, workers welfare, PPE and etc.
- **Barn owl Box.** Observation related management of IPM.

2.3	<b>Stakeholder Consultation and Stakeholders Contacted</b>
2.3.1	<b>Summary of stakeholder consultation process.</b>
ASA-1	<p>Summary of stakeholder consultation process            Consultation of stakeholders for Tenggaroh Mill, FGVPI Sdn Bhd – FGV Holdings Bhd was held by:</p> <ul style="list-style-type: none"> <li>• Public Notification on website on January 6<sup>th</sup>, 2020.</li> <li>• Public consultation meeting with communities including previous land owner on January 14<sup>th</sup>, 2020</li> <li>• Public consultation meeting with internal stakeholders and contractor on January 14<sup>th</sup>, 2020</li> </ul> <p>Numbers of input from stakeholders were clarified by Tenggaroh POM, FGVPI Sdn Bhd – FGV Holdings Bhd.</p>
2.3.2	<b>Stakeholder contacted</b>

*Please find appendix 1*

<b>2.4</b>	<b>Determining Next Assessment</b>
	The next visit <a href="#">ASA-2</a> will be conducted eight (8) month to twelve (12) month after date of annual license.

**3.0 ASSESSMENT FINDINGS**

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

MUTUAGUNG LESTARI has conducted an assessment of Tenggaroh POM, FGVPI Sdn Bhd – FGV Holdings Bhd consisting of one (1) mill and three (03) oil palm estates.

During the assessment, there were three (03) Nonconformities were assigned against Major Compliance Indicators, two (02) nonconformities were assigned against Minor Compliance Indicators and seven (07) 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 actions that had been reviewed and accepted by Auditor(s) in form of documentation evidences.

MUTUAGUNG LESTARI found that Tenggaroh POM, FGVPI Sdn Bhd – FGV Holdings Bhd complied with the requirements of Malaysia National Interpretation (MYNI) 2019 of the RSPO Principles And Criteria 2018 for Sustainable Palm Oil Production, Endorsed by the RSPO Board of Governors on 7th November 2019 and RSPO Certification System for Principles and Criteria, 14 June 2017.

Therefore MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is continued.

Ref Std.	VERIFICATION RESULT of MUTU-Certification
<b>PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY</b>	
<b>1.1 The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</b>	
<p><b>1.1.1</b> The mill management annually organize get together with local communities [Stakeholder Meeting] as part of promoting MSPO requirements. The recent meeting was held on 28/05/2019 and among the issues which were discuss includes Sustainability Policies, the FFB supply chain, mill processing details and etc. Seen the complaint &amp; grievances “Stakeholder Logbook / Rungutan Pentadbiran” that has no comments registered since Apr’18, either for “Complaint &amp; Grievances” or on “Consultation &amp; Communication”. In accordance to SOP-FGV/ML-1A/L2-Pr13 (Complaint &amp; Grievances), the mill shall respond to any enquiries from external stakeholder’s within 14 days and within 7 days for internal stakeholder from date of recipients.</p> <p>The information on the publicly available documents such as land title, OSH plan, sustainable policies and CIP seen specifically addressed in page 7 of SOP-FGVP/ML-1A/L2-Pr12. The information also been communicated to external stakeholder during annual centralize stakeholder meeting.</p> <p>Based on the SOP-FGVP/ML-1A/L2-Pr21, page 5 point 6.1.9.2 the stakeholder meeting at complex level to be held once in 5 years. The centralize stakeholder meeting for Mersing Complex was done on 04/10/17 attended by 180 stakeholders. Various issues such as awareness on sustainability programs, briefing on sustainability policies and etc. Log book titled “Buku Rekod Rungutan dan Aduan” established for tracking of internal and/or external complaint, there was no request nor complaint from external stakeholders for FGVPM Tenggaroh 09. The internal stakeholders such as settlers from Tenggaroh 04, Tenggaroh 02 and estate workers have requested on household maintenance issues and a complaint on FFB transporting lorry’s exhaust too noisy, that sighted with action taken documented.</p>	
<p><b>1.1.2</b> Based on stakeholder made on 10<sup>th</sup> July 2018, the information related to the information been communicated to the local stakeholders are including the latest policies, company procedure and FGV management of Sustainable palm Oil. Sighted the slide had been presented in the local language of stakeholders attendees which is in Malay language as the medium communication and had been understood by the stakeholders based on feedback arising from the issues.</p>	



The minutes of the stakeholder meeting been recorded by the management into the stakeholder consultation document and accessible in the office of each estate and mill by the local internal and external stakeholders. Based on the meeting on 27<sup>th</sup> February that have been conducted to the local contractors, local people and relevant stakeholders, it was confirmed that the FGV management had done the engagement which include HCV briefing, New policy briefing, safety policy briefing , and also social and economic responsibility. The information on the publicly available documents such as land title, OHS plan, sustainable policies and CIP seen specifically addressed in page 7 of SOP-FGVP/ML-1A/L2-Pr12. The information also been communicated to external stakeholder during annual centralize stakeholder meeting. Interview with RSPO in chargers in both estates, found they are aware on the publicly available documents and were able to produce the a few samples such as HCV report, SIA reports, stakeholder meeting minutes and etc.

**1.1.3 and 1.1.4**

The company had maintain the record and request of the responses in a designated logbook at each estate and the mill used the complaint form related to any complain. Sighted the complaint book related to FGV and the latest logbook maintained on year to date on 2019 which include the details :

- i) Name of complainer
- ii) Details of complain
- iii) Action to be taken
- iv) Date of action
- v) Officer involved
- vi) Signature date
- vii) Respond from complainer

There are 2 types of stakeholder lists, 1<sup>st</sup> on the complex level that covers broader scale and 2<sup>nd</sup> for immediate stakeholder for respective sites. The latest reviewed of immediate stakeholder list consists of government agencies, JKKK and other interested parties. The meeting minutes with stakeholder are effectively documented. The complaint received and responded details by estate sighted in the “Buku Rekod Rungutan dan Aduan”. Each of the estates sampling had made the record book as per procedure of FGV to record the complaint internally such as house repairing, safety report and also the record of repairing and monitoring. Sighted the nominated representative had been assigned to Mill Assistant Engineer and estate assistant manager as Executive assistant for the communication officer that their responsibility involving :

- i) Updating the record and internal external shoulder
- ii) Deliver the program, policy and procedure to be understand by the stakeholders
- iii) Respond towards the cases and report on the problem solution.
- iv) Informing the issues / report to the cases that has been made to the complainer

**1.1.5**

There are 2 types of stakeholder lists, 1<sup>st</sup> on the complex level that covers broader scale and 2<sup>nd</sup> for immediate stakeholder for respective sites. The latest reviewed of immediate stakeholder list consists of government agencies, JKKK and other interested parties. The meeting minutes with stakeholder are effectively documented. The complaint received and responded details by estate sighted in the “Buku Rekod Rungutan dan Aduan”. Sighted the record had been divided into the details of estate , name of officer , telephone and fax number , position, name of company / agency , and address. Sighted the nominative person to [Assistant Manager] of FGV T9, 11 and 13 that will handled all the related matters related to stakeholders dated 10<sup>th</sup> January 2019 and being approve by the estate managers.

**Status: Comply**

**1.2**

**The unit of certification commits to ethical conduct in all business operations and transactions.**

**1.2.1 and 1.2.2**

Group Sustainability Policy [GSP Policy] dated 29<sup>th</sup> May and approve by the FGV Chairman, Dato Wira Azhar is available and being communicated at the mill and estate. Sighted the training dated 9<sup>th</sup> June 2019 attended by 55 workers at Tenggaroh Milll including the managers, assistant manager, boilerman, clerk, office and operations staff. Based on the field interview, the workers aware that the policy existed in the company and being briefed from time to time. Sighted the group sustainability policy that mentioned related to code of ethical conduct and business. Sighted on the FGV Plantations Malaysia group Guideline and procedures responsible recruitment for foreign workers :

“ Pre-employment stage → recruitment agent no. 2 “the appointed recruitment shall adhere to all terms and conditions stated in the agreement and FGV group suppliers code of conduct SCOC”

Sighted the system available as per procedure to monitor the compliance and implementation of overall ethical business through procedure of *Jabatan Tenaga Kerja* for current procedure.

Sighted the FGV group Guidelines and procedures for responsible recruitment of Foreign workers which the system on code of ethical will be monitor through the details and been implemented in all business operations which commenced on 1<sup>st</sup> February 2019 [FGV/ FGVP- JTK / POL/ 001] comprising the new policy on recruitment FGV[ Recruitment process] :

- i) FGV Group guidelines and procedure for responsible recruitment of foreign workers
- ii) Average the estate workers budgeted.
- iii) New workers quota request
- iv) Interview and socialization process
- v) New visa applications
- vi) New workers entrance at the Malaysian entrance

The company had developed a system related compliance and the implementation of the policy and overall ethical business practice for the whole FGV recruitment, business and all operations which is: Through e-procurement [procure-here] system FGV → sign the code of ethical conduct → sign the confidentiality agreement of business ethical conduct → govern by all the GSP policy including anti-bribery policy, no door gift policy and Supplier code of conduct from the website.

**Status: Comply**

**PRINCIPLE #2 OPERATE LEGALLY AND RESPECT RIGHTS**

**2.1**

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

**2.1.1.**

Among the applicable permits and license that was verified were the MPOB license for Purchase and Transporting FFB, PK, CPO, SPO (license number 500167904000). The DOE license and Jadual Pematuhan # No. 004644 for the period of 01/07/19 – 30/06/20 with Capacity Maximum: 54 MT/Hours was available. The Certified Environmental Professional in Waste Management (CePSWaM) and Certified Environmental Professional in the Operation of Palm Oil Mill Effluent Treatment System – Pond Processes (CePPOMETs) were sighted for the assistant engineer [FTR application on January 2019].

The mill is also complying to CEMS monitoring which was seen stable at boiler room [graph appears well on the screen while the mill in operation]. Aside, the CCTV for stack emission monitoring was seen well managed. Authorized Gas Tester, Electrical Charge Man and Boiler man lists were made available. The Latest of Additional Noise Exposure Monitoring Under Regulation 12 and as required by Second Schedule, Regulation 13 of EQA (Clean Air 2014) Stack Emission monitoring for boiler 3 was done. Sighted also other legal requirement that had been fulfilled such as :

- i) 4 units compressor had been renewed the licenses,
- ii) 4 boilerman license available
- iii) lifting crane machine been checked by DOSH,
- iv) letter approval from DOE to inspect the Effluent BOD between 20-100 mg/l
- v) letter approval for the smoke density – particles not more than 300 mg/m<sup>3</sup> and not more that dark intensity of number 2 Ringelmann Chart
- vi) The information related to letter approval on incinerator operation dated 22<sup>nd</sup> February 2017 by DOE Kluang, Johor [ref : AS(B)J31/152/000/038
- vii) License abstraction of river water → year 2020 fail Number : BAKAJ/334/300/05/10/08/02 approval to FGV Palm Industries Sdn Bhd KS Tenggaroh dated 31<sup>st</sup> December 2019

As for the estates, sighted also the certificate of compliance for the hostel to be safely living approved by JTK Johor state as per details following [*Perakuan Kelayakan peraturan standard minimum perumahan dan kemudahan pekerja*]

1990- form 2]:

- i) Number of competency license: K.19/2011 dated 1<sup>st</sup> April 2015.
- ii) Number of competency license: K.10 / 2011 dated 1<sup>st</sup> April 2015 – ref number 41 dlm TK(NJ) / Pelan (KG) -128 (S) dated 1<sup>st</sup> April 2015.
- iii) Number of competency license K.11/2009 ref. number (40) dlm. TK (NJ)/Pelan (KG)-128 (S) dated 1<sup>st</sup> April 2015.

The mill and it supply bases has had a valid MPOB license as per MPOB requirement, as follows:

- MPOB license of KKS Tenggaroh, no. 628417015000, for purchase, sell and distribution FFB, valid for 1 year since 9 Jul 2019 – 30 June 2020.
- Tenggaroh 9 → FGVPM Tenggaroh 09, sampled the MPOB License – 560023002000, expires on 31/03/20 [3098.89 Ha but planted area is 2693.80 Ha for sell and distribution FFB. License no. 600596011000 valid on 2 Jul 2019 – 31 Jul 2020 for produce, sell, store and distribute FFB.
- Tenggaroh 11 → has had MPOB License No. 558879002000 for activity sell and distribute FFB that signed by *Ketua Pengarah Lembaga Minyak Malaysia* since 3 January 2019 valid February 29, 2019 for 1,596.76 Ha.
- Tenggaroh 13 → has had MPOB License No. 558880002000 for activity sell and distribute FFB that signed by *Ketua Pengarah Lembaga Minyak Malaysia* since January 3<sup>th</sup> 2020 until February 28<sup>th</sup> 2021 for **1641.59 Ha**

**2.1.2**

There is a “Legal & Requirements Register” established by the SCC Department [Sustainability Compliance & Certification] from FGV HQ which verified for compliance by the mill’s asst. manager. Sighted a compliance checklist established for monitoring of environment, safety, and health, etc. Sighted the list of compliance updated and circulated to mill by the sustainability team from HQ. Based on the interview, if there is any changes in the system / policy / or regulation, the communication had been pass through the unit of certification itself.

A mechanism to ensure compliance to LORR has been documented in FGV/ML-1A/L2-Pr6 dated 01/06/16. In FGVPM Tenggaroh 09, sampled the MPOB License – 560023002000, expires on 31/03/20 [3098.89 Ha but planted area is 2693.80 Ha], CHRA against USECHH 2000 reg. 12 – Jan 2017 by ENV Consultancy & Monitoring Services Sdn. Bhd., Annual medical surveillance against USECHH 2000 – for 69 workers dated 25/05/19. No workers with abnormal results or workers recommended for removal. The results of Cholinesterase and Spirometry made available. And permit for diesel – P (J/MSG 000010) [10,000 Liter] expires on 03/03/20. In FGVPM Tenggaroh 13, verified Fire Extinguisher, 13 sets for office and operation – expiry dates 21/06/20 – 24/09/20 and Deduction of utility bills, hospital treatment and etc. from pay (Sek. 24 Employment Act 1955) 26/04/16.

The company to consider follow up the progress of obtaining work permit for foreign workers to JTKA (Tenggaroh 13 Estate) **OFI**.

**2.1.3**

Provided the record of boundaries stone monitoring which informs: no. pole, coordinate, and date. Monitoring and maintainance of boundaries was routinely once a year, sighted the records for e.g. in Tg 9 and Tg 13 which informs number coordinate, condition, block and photo documentation. There is no found any of overplanted during field observation.

Field observations carried out to the border boundary number 787 (Tenggaroh 9), it was observed that the stone are available, visible and maintained.

Based on monitoring, found that some of boundary stone are lost and covered by soil, a re-installation program has been established by all estates, for example in Tenggaroh 11 sent a letter to the Kuala Lumpur Partnership Corporate Service on 5 November 2019 (BIL (10) 3647 / UKURPEMETAAN / 2019) explaining the estate request to re-measure the area boundary and reassemble the border stone. Sighted the re-installation of border stone in Tenggaroh 9 for 2020.

**OFI**

	<b>Status: OFI</b>	
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**2.2****All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.****2.2.1**

Sighted the list of contractors been recorded at the mill which include the FFB Suppliers, the one-off contractors as per SPK Listed and kept at the mill which include buyers name , managers name, contact number and address of buyers and suppliers. The mill had recorded 8 buyers of CPO and PK and 13 list name of FFB Suppliers to the mill. FGVPM Tenggaraoh 9 had employed an external contractor for FFB transportation and the company had kept the records of each contractor payslip to the workers. List of contractor available as per stated in the estate and being displayed in side the office. Any update will done by the office clerk inside the office. Sighted 7 contractors available for Tenggaraoh 9 (updated until January 2020) , 2 contractors for transportation of FFB and workers transportation for FGV T13 and 6 list of contractors in Tenggaraoh 11 which include FFB transportation form estate to the mill. The company had record the list contractors with details name of estate, peringkat and block, name of dealers, contract number, type of work, quantity send, rate of price, SPK value, date started, date ended and notes. Based on the interview with the estate management, sighted no subcontracted workers that doing the estate activities such as spraying, harvesting and manuring.

**2.2.2.**

During the audit at KS Tenggaraoh, it was verified that the contracts related to FFB Suppliers for FGV Tenggaraoh Mill is not sighted. Hence the auditor unable to verify the specific clauses related to the legal requirements that should be stated inside the contract. Mill Management unable to show the contract documents for the FFB Suppliers.

FGV has a documents Supplier code of conduct to facilitate procurement practice of the principles of trust, honesty fairness and transparency besides nurturing a high level of integrity, openness and accountability of the supplier when carrying out procurements matters.

The company had developed a system related compliance and the implementation of the policy and overall ethical business practice for the whole FGV recruitment, business and all operations Through e-procurement [procure-here] system FGV → sign the code of ethical conduct → sign the confidentiality agreement of business ethical conduct → govern by all the GSP policy including anti-bribery policy, no door gift policy and Supplier code of conduct.

To ensure the fulfillments of the recruitment agencies for migrant workers to Supplier Code of conducts and Group Sustainability Policies, FGV has been carry out verifications audit to recruitment agencies To verify the recruitment process as per FGV recruitment SOP and guidelines, and to identify any other potential shortcomings against human rights issues.

- a. Verify FGV's implementation of the CP decision throughout FGV's Plantation unit and identify the gaps against the actual implementation.
- b. Determine the extent of and effectiveness of the actions undertaken by FGV to address the CP Decision on recruitment of foreign workers.

Based on verification document of contracts in FGV Tenggaraoh Mill, the mill had kept the contract at the HQ due to privacy on the pricing. Hence the auditor unable to verify the contract details that involved between the supplier and mill.

During the audit at KS Tenggaraoh, it was verified that the contracts related to FFB Suppliers for FGV Tenggaraoh Mill is not sighted. Hence the auditor unable to verify the specific clauses related to the legal requirements that should be stated inside the contract. Mill Management unable to show the contract documents for the FFB Suppliers. Its become **NCR No.2020.01 with critical category.**

**2.2.3.**

FGV PM had kept the contractors contract inside the estate which include the SPK for the contractor which have terms and conditions and the obligation for the FGV estates to sign and acknowledge the Supplier code of conduct from FGV Holdings. sighted the SCOC that been signed by the contractors and clause no. 5.1 and 5.2 which mentioned :

- i) Supplier shall not employ force labour, which consist of any work or service not voluntarily performed that is exacted from an individual under threat and forces or penalty and includes any kind of involuntary compulsory labor

- ii) 5.2 → suppliers shall not employ child labor in a manner that is economically exploitative or is likely to be hazardous or to interfere with the child’s education or to be harmful to the child health or physical mental, spiritual moral or social development at any stage of contracted period
- iii) Supplier must comply with all relevant laws and regulations governing child labor and apprenticeship programs of the Country of which the Group operates in

The Contractor will sign the contract inside the estate and the contract had been copies by the contractors and the original in the estate. Based on the interview with contractors, it was confirmed that the FGV had brief the contractors related to the company policy, safety and RSPO Policies.

**2.2.2 Status: NCR No.2020.01 with critical category.**

**2.3 All FFB supplies from outside the unit of certification are from legal sources.**

2.3.1, 2.3.2  
The CH has ensure that all the FFB are supplied from legal sources, it was mentioned in procedure of third party FFB sources is presented in document No. FGV/FGVPM/II/QOSHE/15/012.1 dated April 1<sup>st</sup> 2016 (Revised in May 31<sup>st</sup> 2017), stated that all suppliers shall be clear on hectare, location, yield, year of planting, planting material, land ownership and license.

Based on document verification, field observation and interview with mill management it is known that it received FFB from own estate, direct supplier and indirect supplier. The list of FFB has been recorded and visible to auditor. Besides of FGVPM (9, 11 and 13), there was 3 independent supplier, 9 supplier under Felda Technoplant, 9 supplier under Felda (peneroke). All the direct supplier has been informs contact person and mobile number, location, hectares and coordinate, there was copy of MPOB license attached to the list

- For e.g.:
- Mahadi Bin Sulaiman, address in Daerah Batu Pahat – Johor, 1.24 Ha, coordinate: X2.07116-Y103.16163, MPOB license no. 757186001008 (menjual dan mengalih) valid until 29 Feb 2024.
  - Moh Arif Bin Moh Ali, address in Mersing-Johor, 0.81 Ha, coordinate: X2.25444-Y103.80022, MPOB license no. 757547001008 (menjual dan mengalih) valid until 29 Feb 2024

Sighted that there was 9 indirect supplier including ramp and dealer, for e.g: Dealer Bingan Jaya Sdn Bhd (License no. 546328015000 valid until 31 Jan 2020), supplied by 6 sources. The information that requires in 2.3.1 has been informed in the list.

**Status: Comply**

**PRINCIPLE #3 OPTIMISE PRODUCTIVITY, EFFICIENCY, POSITIVE IMPACTS AND RESILIENCE**

**3.1 There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.**

- 3.1.1  
Sighted the long term management plan for Estates, were prepared by Assistant, issued by Estate Manager and presented in Estate Budget for 2020 to 2023. The budget has covers production cost, FFB projection and price which referred to the MPOB. For example, breakdown of long term management plan is presented as follows:
- Annual yield projection in Tenggaroh 09 Estate were about 18.02 ton/ha, 16.68 ton/ha and 15.16 ton/ha, respectively.
  - FFB price projection in Tenggaroh 13 Estate were about RM 550/ton, RM 500/ton and RM 500/ton, respectively.
  - Annual yield projection in Tenggaroh 11 Estate were about 29,173.00 ton; 30,270.00 ton and 31,070.00 ton, respectively.

The POM has set the long term budget for 3 year since 2020 – 2023, which informs CPO production, PK production, OER, KER, product dispatch, and as well as revenue cost, for 2020: CPO production 62045.97 MT, OER : 22.45%, PK: 14781.82 MT, KER: 5.45%.



**3.1.2**

Based on area statement, oil palms in three Estate was entering the second cycle of planting or first replanting. All replanting activities has complete in tenggaroh 9 estate. The tenggaroh 13 planned to replanting some are in 2021 (373.25 Ha – PM00A, PM97B, PM00C) and 2023 (420.49 Ha – PM00E). There is no replanting programmed in Tenggaroh 11 for the next five years.

**3.1.3**

The mill hold management review once in 3 month related to FFB supply, the latest are held on 26 Nov 2019, the review including related to RSPO/MSPO implementation by supplier. Management review for operation held on 1 Jan 2020, related to production, trainings, workers, OHS, environment and SCCS.

The internal management review in the three estates are hold once a year, the latest are done in 201, for e.g. in Tenggaroh 9 held on 23 Oct 2019 while in Tenggaroh 13 was done on 23-24 Oct 2019. The management review are discussed: internal and external audit result, FPIC, land dispute, complaint, grievance, salary payment, social, environment, OHS and workers welfare, production, and IPM.

**Status: Comply**

**3.2**

**The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.**

**3.2.1.**

Group Sustainability Policies sampled for 5.2 Profitability and Use of Resources stated that FGV Group shall adopt lean management for efficiency improvement, reduce wastage and leakage in its operations by improving competency and capacity of employees and workers in performing their task efficiently, align management strategies and operational system towards efficient use of material and resources and continuously reviewing internal control system and process to minimize and eliminate leakages.

**Tenggaroh 9 & 13 Estate.**

The FGVPM Tenggaroh 09 estate established CIP for 2018/2019, focusing on environment, social and production. Sampled environment continual improvement plan to reduce the pesticide usage by using biological control, planting the beneficial plant, RB larva control and installation of barn owl boxes. In FGVPM Tenggaroh 13, sighted the CIP through (*Program Pengurusan Kualiti, Alam Sekitar, Sosial, Keselamatan & Kesihatan Pekerja* – FGV/FGVPM/F(IMS)/3.2 Pind. 1 dated on 28.10.2019 to detail out the improvement plan on environment, pesticide usage, social problem and GHG emissions.

**Tenggaroh 11 Estate.**

There are plans for future improvements that inform the activities, plans and actual, units, references and so forth. For example, a reduction in chemical use, do not use chemicals class 1 (*Paraquat*), the addition of an owls nest, planting beneficial plants, and others. As for social activities such as social programs, youth education and development programs, training for foreign workers and so on.

**3.2.2.**

The company has been reporting Palm GHG, Annual Communication of progress (ACOP) reporting, production data to CB and others.

**Status: Comply**

**3.3**

**Operating procedures are appropriately documented, consistently implemented and monitored.**

**3.3.1**

Sighted the mill's SOP for the schedule waste "Procedure handling of scheduled waste" reference FPI / L2 / QOHSE – 9.0 -dated 15<sup>th</sup> September 2014 FPISB that include objective, scope of procedure, responsibility, reference, procedure, handling and disposal of scheduled waste (empty drums), handling of scheduled waste using pump and the storage area of scheduled waste as per Director General requirement

The mill has 2 tiers of documents namely Mill Operating System Manual – FPI-L3/xx/xx (Level 1), Standard Operating Procedures (SOP – Level 2) which consist of OSH procedure – PI-PK-xxx, training manual, work instructions and etc. The Level 3 are records.

During site visit to loading ramp, boiler room, kernel plant displayed of the relevant SOPs. The SOPs were developed for relevant production section, such as Reception Station, Fruit Handling Station, Sterilization Station, Threshing Station, Pressing Station, and Clarification Station and etc. Safety work procedure has included on the mill processing procedure at each station.

Document revision well controlled with updated version keep track, such as the SOPs on OH last reviewed on 26/10/18. Since all the mill workers and staff are locals, therefore the procedures were available in Bahasa Melayu. Based on interview with loading ramp operator, sterilizer operator and POME in-charger they are able to explain the respective station's work instruction. Sampled, training records on SOPs dated on 07/02/19 that attended by 86 staff and workers.

In Tenggara 09,11 and 13, the reference Manual Ladang Sawit Lestari (MLSL) and various Standard Operating Procedures (SOP) available that covered the key processes like harvesting, transportation, fertilizing, IPM, chemical handling and Manuring. Based on the training records, most of the SOP related trainings done during roll call. Example, safety measures while spotting dangerous spices/animal dated 05/02/19. On 19/03/19 an awareness training on restriction of keep or using used pesticide containers and on 18/09/19 a training session done on fertilizing process.

In Tenggara 13, the procedures (SOP) sighted in the Sustainable Estate Manual that divided into five documents such as No. MLSL (Ed. 2) Vol. I – Sec. 1 (1.0 – 20.0) management on nursery, No. MLSL (Ed. 2) Vol. I – Sec. 2 (1.0 – 20.0) replanting, No. MLSL (Ed. 2) Vol. I – Sec. 3 (1.0 – 11.0) immature palm management and etc. The SOP has covers all agronomy aspects such as land preparation, nursery, planting, field upkeep, weeds control, integrated pest management, harvesting management, soil fertility enhancement (Manuring, by-products application). Sighted the road maintenance program, grading & rolling done in Mar'19 for 47050 meter and pruning at road side was last done in Aug'19 for 5.6 Ha. Since this estate is gazette for sand mining on phase by phase. Therefore, the manuring program at Block 00A and 97B been delayed since 2016.

**3.3.2 and 3.3.3.**

FGV Plantations and FGV Palm Industries had developed the checklist and monitoring of procedure to be followed and the consistency of the works had been thoroughly checked into various activities such as :

- i) For monitoring of scheduled waste → monthly monitoring by [mill foreman] that will check through all the waste related component such as , store in a good condition ,
- ii) SOP for Safety and health → yearly monitoring of audiometric test, yearly HIRARC revision for the workers safety and daily briefing [morning assembly for the workers]
- iii) Boiler water treatment → reading on the rate of chemical inside the water → the result will be collected and record in the logbook [daily and monthly record]
- iv) Performance monitoring of POME → Monthly submitted to DOE, daily recorded in check sheet
- v) Smoke density monitoring → CCTV installed and the reading system intensity recorded and online checking with DOE.

Based on the field verification and management interview with bot mill and estate, they had recorded the records of monitoring and been kept in the folder of each estates and mill. Monitoring on safety had been conducted during morning roll call and checklist of item being used in the estate had been thoroughly inspected. Sighted also monitoring records of PPE issuance and PPE Usage by workers. HCV Training which include regular monitoring of the wild life such as elephant and monkey also sighted.

	<b>Status: Comply</b>	
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**3.4  
A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.**

**3.4.1, 3.4.2, 3.4.3**  
There is no independent being SEIA being made assess in the mill since year 2019. sighted the EAI been made on July 2018 and for 2019 the management review been conducted on 1<sup>st</sup> July 2019 which assess the details on Aspect impact

on Environment :

- i) Risk Opportunities Identification
- ii) Dated of review – 1<sup>st</sup> July 2019
- iii) Source risk and opportunities
- iv) Issues
- v) RISK and Opportunities
- vi) Existing mitigation
- vii) Risk Assessment [Risk Impact , Livelihood, Risk rating ]
- viii) Planning action – Action plan and status of implementation / performance indicator

Sighted the issues been recorded which is internal issues, and external issue, compliance obligation and how mitigate the issues arising. Sighted the action plan to reduce impact on environment and pollution which stated source of pollution → action plan needed → responsible person → timeline for 2018-2019 [January – December ] monitoring from 2018 -2019 (January – December 2019) pesticide spillage → reduce it during training .

SIA assessment for the unit certification has been done in 2018. Based on SIA documents review there are several negative issues which connect the management plan that all falls within short term [resolving within a year], mid-term [resolving within 6- 12 months] and long term [implementation within 2 years]. Based on the document observed, sighted the minutes meeting for the explanation on RSPO and MSPO to the stakeholders – [ref FGV / E1.4.2] dated 23<sup>rd</sup> December 2019 at meeting room Tenggaroh 13 Estate.

Sighted discussion on reviewing the management plan and social impact dated 12<sup>th</sup> November 2019 at 1445 pm. Based on the document, any arising issues from 2018 had been discussed. The issues arising from year 2018 which include the impact, action taken, had been periodically monitored by the responsible persons for each unit.

**Status: Comply**

**3.5**

**A system for managing human resources is in place.**

**3.5.1 & 3.5.2**

**Local workers.**

There is CLA between FGV Palm Industries SDN BHD with labour union of FGV Palm industries SDN BHD Semenanjung from January 01<sup>st</sup>, 2019 until December 31<sup>st</sup>, 2021. Consist of:

- Clause 15 Deduction
- Clause 16 term of service for employees of FELDA or Company.
- Clause 17 Promotion / Grade.
- Clause 18 Salary level
- Clause 19 Annual salary increase
- Clause 20 Notice of resignation
- Clause 21 Resignation / vacancy without notice
- Clause 22 Termination of employment
- Clause 25 Disciplinary procedures
- Clause 28 Working hours
- Clause 29 Working overtime
- Clause 30 Holidays
- Clause 31 Training facilities
- Clause 34 Benefits (Housing, hardship, responsibility, turn, division head, laundry, motorcycle and area).
- Clause 35 Project incentive payment
- Clause 36 Annual bonus.

**Foreign workers.**

There is FGV Group Guidelines and procedures for responsible recruitment of foreign workers with policy number FGV/FGVPM-JTK/POL/001 on June 27<sup>th</sup>, 2019. This guidelines are contain foreign workers requisition, pre employments, employments, and post-employments.

For foreign workers, the employment procedures has been include in Contract Labor Agreement for each worker and

there is FGV Group Guidelines and procedures for responsible recruitment of foreign workers with policy number FGV/FGVPM-JTK/POL/001 on June 27<sup>th</sup>, 2019.

Based on interview with management representative in mill and estate, this CLA has been given to local & foreign workers and the procedure of foreign workers recruitment has been keep in each office.

Based on interview with harvesters in block 46/07 Tenggaroh 9 Estate, Block 05 in Tenggaroh 11 Estate, pesticide applicators in Block 03 PM 05 Tenggaroh 11 Estate and fertilizer applicators in Block 16 Tenggaroh 9 Estate they have been know they will work in the plantation sector. Beside that, they have been signed the contract in their origin country and before the sign the contract they have been briefing related they job.

**Status: Comply**

**3.6 An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.**

**3.6.1**  
An occupational safety and health (OSH) policy for KKS Tenggaroh has issued by “Ketua Pegawai Eksekutif” Felda Palm Industries Sdn Bhd Mohd Saodi Husin (Pindaan (10) 20 November 2017. The policy declared nine points which mentioned that the FGV has committed to comply with all relevent safety, health and environment laws and regulations (OSHA Act 1994). Communication of policy observed by displaying on notice board. HIRADC performed for all factory processes and documented. Sighted also the new health and safety policy had been communicated to Tenggaroh POM dated 8<sup>th</sup> May 2019 signed by Dato Haris Fadzillah (Group CEO of FGV Holdings) as part of group sustainability policy. HIRADC been prepared by Osh Committee on 21<sup>st</sup> August 2019 and verified by SHO on 3<sup>rd</sup> September 2019 observed. Such as vacum dryer activities, pre cleaner, sludge operator and sludge pit. An evidence of awareness and training programme latest on 2018 sch as fire drill on 01/10/2019, First Aid training on 15/10/19, training by BOMBA . sighted alos the plan training on for the motorcycle safety will be on september 2019. The session with FGV Security also sighted and resulting into mill and biogas plan reduced to 5 personnel and syif arrangemnt 2X1X2. An evidence of attandance and photos sighted during documentation.

**3.6.2**  
The sampled estates had updated the health and safety Policy dated 29<sup>th</sup> May 2019 which has been approved by the Group FGV Chairman and had been communicated to internal and external stakeholders. A commitment related to OSH stipulated in document of policy clause 3.1.5 which stated that “FGV Group is committed to provide a healthy and safe working environment in its operation for all its workers and employees. The policy is written in English which stated that FGVPM committed to delivering value to our stakeholders by operating in a sustainable and environmentally manner. This providing a committed to pursue compliances towards Legal and other related OSH requirements, providing adequate knowledge through training and experience which aims to maintain good competency for employees, preventing work accident, as well as providing a safe and healthy working environment. Policy briefing had been conducted in FGVPM Tenggaroh 9 on month October 2019 as part of training program. Sighted also the monitoring of the safety by regional safety and health officer for the estate and he will in charge matter related to safety, health and environment. It was confirmed the estates had conducted the fire safety training and first aid kit training internally to create awareness on safety priority.

**Status: Comply**

**3.7 All staff, workers, Scheme Smallholders, out growers, and contract workers are appropriately trained.**

**3.7.1.**  
There is training program for Tenggaroh Mill on 2020 such as:

- OHS Policy on January 2020.
- OHS Manual on February 2020
- OHS meeting on March 2020.
- PPE on March 2020.

- ERP & Training on April 2020.
- Safety in work area on May 2020.
- First aid in July 2020
- Fire fighters on June 2020
- Chemical on Feb 2020
- RSPO, HIRARC, regulation on August 2020.
- Harassment sexual policy on November 2020.
- SCCS on August 2020.
- Harvesting technical guidance.
- Pesticide technical guidance
- Fertilizer technical guidance
- And others.

**Tenggaroh 9 Estate.**

There is training program for Tenggaroh 9 Estate on 2020 such as:

- Description related OHS policy on March.
- Description related manual OHS on March.
- Minutes of meeting JKKAS on May.
- PPE management on April and May.
- ERP & training on April and June.
- Safety in work area on May.
- First aid on January.
- Fire fighters on August.
- Chemical handling on March.
- RSPO, Impact assessment, HIRAC and regulation on February.
- Management of IPM on October.
- HCV management on November.
- Harvesting technical learning on November.
- Spraying technical learning on April.
- Fertilizer technical learning on June.

**Tenggaroh 13 Estate.**

There is training program for Tenggaroh 13 Estate on 2020 such as:

- Description related OHS policy on February, June & October 2020.
- Description related manual OHS on February, June & October 2020.
- Minutes of meeting JKKAS on February, May, August and November 2020.
- PPE management on
- ERP & training on
- Safety in work area on
- First aid on
- Fire fighters on
- Chemical handling on
- RSPO, Impact assessment, HIRAC and regulation on
- Management of IPM on
- HCV management on
- Harvesting technical learning on
- Spraying technical learning on
- Fertilizer technical learning on

**Tenggaroh 11 Estate.**

There is training program for Tenggaroh 11 Estate on 2020 such as:

- Integrated Pest Management on February – December 2020.
- Fire fighters on November 2020.
- PPE on February 2020.
- First aid on February and August 2020.
- OHS awareness on February 2020.
- And others.

Based on interview with pesticide applicators Blok 19/OOI, harvesters Blok 10/11 Field PM OOC and fertilizer applicators it was known that there had been training for 3 months before they started working.

**3.7.2.**

**Tenggaroh Mill.**

Training records are listed in the 2019 staff training records such as: safety briefing on April 11, 2019 located in the mill area; briefings and courses biogas dated December 20, 2019; safety procedures on June 15, 2019; welding training December 9, 2019; SCCS training on October 24, 2019 (16 people), introduction of chemicals and others.

**Tenggaroh 09 Estate.**

There is training record in 2019 for workers in Estate such as training of schedule waste on October 20<sup>th</sup>, 2019 (15 people); Socialization of RSPO on June 25<sup>th</sup>, 2018. Based on interview with workers, they have been trained until 3 months before start to working and every morning call there is socialization related working technical.

**Tenggaroh 13 Estate.**

There is training record in 2019 such as socialization whistleblowing on May 8, 2019; minimum wages on October 29<sup>th</sup>; 2019; training first aid on August 21<sup>st</sup>, 2019; training IPM on August 24<sup>th</sup>, 2019; PPE for harvester on February 11<sup>th</sup>, 2019; Fertilizer technical on October 15<sup>th</sup>, 2019; schedule waste training October 20<sup>th</sup>, 2019; handling of chemical on August 26<sup>th</sup>, 2019; socialization for foreign workers (agreement contract; OHS and PPE) on May 20<sup>th</sup>, 2019; and others.

**Tenggaroh 11 Estate.**

There is training record in 2019 such as schedule waste management on October 29<sup>th</sup>, 2019; harvesting technical on December 8<sup>th</sup>, 2019; Based interview with harvester in block 05; pesticide applicators Block 3 PM 05; they have been training as much as 3 months before they starting to working in Estate.

**3.7.3.**

SCCS training on October 24, 2019 (16 people) including Weighbridge operator. The material discussed included the RSPO Supply Chain Certification Standard revised on June 14, 2017. Based on an interview with the Weighbridge operator, he has been familiar with the Supply Chain Standards System.

**Status: Comply**

**3.8**

**Supply Chain Requirements for Mills**

**3.8.1, 3.8.2**

The mill only apply MB (Module E).

KKS Tenggaroh are received and processed FFB from certified and non-certified sources namely from core plantation (certified) and outsider (independent smallholder, independent outgrower and agent). In this case, module E (MB) on RSPO SCC are applied.

**3.8.3**

The POM has set the estimated volume of FFB, CSPO and CSPK that can be produced in one year periode (12 months), the actual produce has been verified by the auditor since Jan – Dec 2019 and as well as the projection for the next 12 month, shown in the table below:

Item	Production estimated (Tonnes)	Actual production (Jan – Dec 2019)	Next year projection
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FFB	65,456	72,787.45	76,427
CPO	13,909	15,543.60	17,578
PK	3,436	3,831.52	3,821

\*The over-production has been note as NCR, in ind. 3.8.7

**3.8.4**

The mill are member RSPO, registered under Felda Global Ventures Holding, No. Membership: 1-0225-16-000-00, 27 December 2016.

The POM has registered in RSPO IT Platform, sub license ID: CB78345, member ID: RSPO\_PO1000003767, member name: FGVPI SB Kilang Sawit Tenggaraoh.

The WB clerk is tasked with:

- Ensure all delivery notes from each lorry are received
- Make sure it is registered in the system
- Input the information from FFB delivery notes to the system such as: source, volume, date, certified / non-certified
- Reporting of CPO / PK delivery, ensuring the CSPO / CSPK delivery note has been stamped with 'Certified' and 'non-certified' properly according to sales contract
- Ensure the delivery of CSPO / CSPK not exceed the quota on palmtrace

Sighted the manual procedure of:

1. RSPO Palm Trace no. 1.0, issued on 1 Dec 2017, flowchart of the RSPO Palm Trace reporting stages
2. Green palm online trading, flow chart for credit sales

Based on interview with WB clerk and production clerk known that they are able to demonstrate the SCC procedure. RSPO SCC training conducted once a year including refreshment, the latest are done on 24 Oct 2019, followed by MM, AMM, KTU, clerk, process assistant, lab. Man, grader, and FELSCO (security).

**3.8.5**

The mill has set the RSPO SCC procedure on document of "SOP Perkilangan untuk pematuhan sistem pensijlan RSPO SCC", issued number: 3, issued date: 1 Sept 2019. The SOP are refer to the RSPO SCC standard and system revised 2017. In the SOP are describes regarding to RSPO SCC general COC, RSPO SCC committee appointment including their tasks and duties (POM manager, assistant manager, WB clerk, mill head adm, lab assistant, Accredited Quantity Supplier foreman).

For example:

**3.8.6**

SOP of internal audit are listed in document FGV/ML-IA/L2-Pr11, effective date 1 Jun 2016, internal audit are planned to be conducted once a year prior to external audit.

The latest audit of RSPO SCC are done on 25 Oct 2019, conducted by Abdul Rahman Bin Awang, the internal audit refer to the RSPO SCC system and standard revised 2017, there was 1 NCR raised, namely related to RSPO SCC management review. The corrective action has been set and implemented by the mill.

**3.8.7.**

The mill has been verified the FFB received from certified and non-certified sources, since Jan – Dec 2019 (12 months period), total certified FFB received and processed is 65,442.72 MT while the non-certified FFB processed amount of 184,779.67 MT.

Based on production report of FFB, CPO and PK Jan-Dec 2019, there is an over-production of CSPO and CSPK compared to the projection tonnage stated in the certificate as per table below:

Item	Production estimated for 12	Actual production (Jan – Dec
------	-----------------------------	------------------------------

	months (Tons)	2019
FFB	65,456	72,787.45 MT
CPO	13,909	15,543.60 MT
PK	3,436	3,831.52 MT

Based on the table above, the mill unable to show the evidences of overproduction certified tonnage has been informed to the CB immediately (indicator clause no ii) . **It's become NCR No.2020.02 with critical category.**

Mechanism for handling non-conforming oil palm products and/or documents are listed in the RSPO SCC SOP on section of "notis amaran/handling non-conformance material & document", stated that the certified product delivered only from positive stock and the copy of certificate RSPO attached to the sales document. The mill will send notification to buyer whether it certificate has suspended or withdraw.

**3.8.8**

Information for RSPO certified products is available in the sales order document, the information including: name and address of the buyer, name and address of the seller, delivery date, date of documents issued, volume of product, applicable supply chain model, and transport information. For example:

- CSPO sales order document date on 13 Jan 2010, no. pass: 030312532, no. sale: H00001280, buyer: FGV-FOD-Pasir Gudang, SO: RSPO9G389GAE/1119/01, SC modul: MB, volume: 58.48 MT.
- CSPK sales order date on 13 Jan 2020, volume: 45.17 MT, buyer: FKP pasir gudang, RSPO MB, sales order: RSPG2169J.

**3.8.9, 3.8.10, 3.8.11**

The POM did not hire any of third parties. Transportation of product from mill to bulking are performed by Felda Transport which is contracted by FGV Logistic Dept (by holding), transportation of product from mill to buyer are performed by buyer itself.

**3.8.12**

Tenggaroh POM has maintain all records of SCC in accurate, complete, and up-to-date, all the records are available in mill office and accessible to auditor, such as FFB suppliers, production record and sales records. Auditor has verified the records since December 2018 (since mill obtain the RSPO certificate).

In the SCC SOP on section record keeping stated that the mill shall maintain the SCC record for 2 years.

Sighted the mass balance for all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK, the record are done on monthly basis since 1 Jan 2019 – 31 Dec 2019. All volumes of certified palm oil and palm kernel that are delivered are deducted from positive stock. Can be seen on table below:

Month	CPO Prod		CPO Sales		PK Prod		PK Sales	
	Cert	Ncert	RSPO	Conv.	Cert	Ncert	RSPO	Conv.
Jan to Dec 2019	15,543.60	40,788.00	2,319.21	12,512.49	3,630.60	9,577.67	2,668.50	489.86

**3.8.13, 3.8.14**

Audit are done to CPO Mill, the conversion rate of CPO (OER) and PK (KER) are based on daily production, for example on Dec 2019 OER : 22.08 and KER: 5.61

**3.8.15**

NA, the mill applying RSPO SCC module E (MB).

**3.8.16.**

Registration of transactions are hold by Marketing Dept. Shipping Announcement records of CSPO and CSPK are provided to auditor since Jan – Dec 2019. There was 5 transaction of CSPO reported to palmtrace, for e.g. transaction

id: TR-3bd83abf-be61, volume: 475.76 MT, dated: 21 Aug 2019. There was 6 transaction of CSPK announced to palmtrace, for e.g. transaction id: TR-0bc77431-c2f9, on 3-12-2019, volume: 325.1 MT.

1. Based on mass balance record keeping since 26 December 2018 until 31 December 2019, it is verified that there is CSPO delivery / sales conducted within Sept 2019 up to Dec 2019. Based on verification of sales transaction under Tenggaroh POM in RSPO IT Platform, it is known that the shipping announcement has been done for the transaction between Jan 2019-Aug 2019.

**However the mill cannot show the evidence that shipping announcement for certified products sold has been carried out by the mills for the delivery/sales in Sept – Dec 2019.**

2. Based on mass balance record keeping since 26 December 2018-31 December 2019, there is an RSPO certified volumes sold under conventional, CSPO amount of 17,512.49 MT and CSPK amount of 489.86 MT. However, the mill cannot shown the evidence of volumes has been **removed in the RSPO IT platform. It's become NCR No.2020.03 with critical category.**

3.8.17

The mill does not use trademark and RSPO logo on it operation, sales document and business communication.

	<b>Status:</b>	
3.8.7.	- NCR No.2020.02 with critical category.	
3.8.16	- NCR No.2020.03 with critical category.	

**PRINCIPLE #4 RESPECT COMMUNITY AND HUMAN RIGHTS AND DELIVER BENEFITS**

4.1

**The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.**

4.1.1.

The management had established a policy on good social practices latest updated on May 2019 approved by Board of Directors that includes of human right policy, strengthening social responsibility, respect for community rights and etc. Sighted the policy had been approved and signed by Group CEO of FGV Holdings, Dato Wira Azhar dated 29<sup>th</sup> May and had been communicated to all workers. Sighted also the whistleblowing policy and also anti-bribery policy being communicated together during the morning assembly.

4.1.2.

Based on interview with pesticide applicator in Blok 13 S Tenggaroh 9 Estate (India 2 workers and Bangladesh 3 workers) and harvesters in Block 10/11 Tenggaroh 13 Estate there isn't violence or use any form of harassment in the company operations.

	<b>Status: Comply</b>	
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4.2

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

4.2.1.

There is FGV Whistleblowing policy approval date on May 25<sup>th</sup>, 2019 approved by Board of Directors.

1. Any employees or member of public who has knowledge or are aware of any improper conduct (misconduct or criminal offence) committed or about to be committed within FGV Group is encouraged to make disclosure, to preserve and protect the group interest and reputation.
2. Whistleblower is responsible to ensure that disclosure is made in good faith and free from any malicious intent. Whistleblower is encouraged to disclose his or her identity to further feedback and notification of outcome.
3. Disclosure of improper conduct can be lodged through several methods:
  - Written (alert form on the FGV website), letter email to [alert@feldaglobal.com](mailto:alert@feldaglobal.com).
  - Telephone call (7 country of phone number)
  - In person (a person who wish to whistle blow, may come in person to meet the secretariat.
4. Whistleblower may also meet any FGV board members to lodge disclosure of improper conduct.

5. All disclosures related to bribery/fraud/abuse of power received within FGV Group shall be forwarded to the secretariat.
6. WBC may deliberate anonymous allegations if the disclosure lodged contain accurate and complete information.

**Protection to whistleblower**

1. Whistleblower will be accorded with protection under the policy provided that the disclosure is made in good faith and comply with terms and conditions of this policy.
2. This policy shall provide protection to whistleblower on :
  - Confidential information and identity of whistleblower.
  - Detrimental action as consequences of whistleblower.
3. Whistleblower that requires protection under the policy shall be referred to authorize officer and to seek approval from GP/CEO.
4. Whistleblower that requires immunity against civil and criminal liability for making the complaint shall be referred to enforcement authority such as Royal Malaysia Police and Malaysia Anti-Corruption Commission.
5. Whistleblower may seek remedy from the board after being proved that Detrimental action in reprisal for a disclosure of improper conduct has been taken against her/him.

Sampled estate had established the SOP No. FGV/ML-1A/L2-Pr12 for Communication/Engagement/Negotiation as the consultation and communication procedures to relevant stakeholders. The SOP has outlined the context of request & response, consultation & communication, and complaint & grievance. A complaint and grievances logbook [internal / external] is kept in the office and whoever the staff at the moment in the office to receive and log the complaint. Based on the field verification, sighted the complaint boxes made available at the estate. Sighted the circular on complaint box dated September 2019 which clearly stated the information on records complain book and the instruction procedure for to all the stakeholders, settlers, staff and contractors. This was cross verified with stakeholder report and action plan on SIA being reviewed yearly by the management.

**4.2.2.**

Based on observation field in housing area (Tenggaroh 9, 11 & 13 Estate), brochures have been installed regarding the procedures for submitting complaints and telephone numbers that can be contacted. Based on interview foreign workers in Tenggaroh Estate, if they have complaint they can tell to representative workers in each country. It include to the illiterate parties.

**4.2.3.**

The employees of the estate made aware that there is complaint system available through the information on morning roll call, communication by estate manager and also information on the notice board being place at the housing area. Sighted the circular by management that the complainers which include settlers, stakeholders, workers, staff and contractors able to made any complaint at any time through the record book at the office and workers quarters. Sighted complain book kept at the office Tenggaroh 13 which recorded the complaint from 20<sup>th</sup> June 2019 until 9<sup>th</sup> October 2019. The action made had been conducted in timely manner and the record are properly kept in the office.

**4.2.4.**

The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and /or act as observers, as well as the option of a third-party mediator has been explain in FGV Whistleblowing policy approval date on May 25<sup>th</sup>, 2019.

**Status: Comply**

**4.3**

**The unit of certification contributes to local sustainable development as agreed by local communities.**

**4.3.1.**

**Tenggaroh 9 Estate.**

FGVPM Tenggaroh 9 had several contribution towards the local development especially to the children nearby the estate. Sighted the evidence of CSR such as a request of using estate owned vehicle as transportation for schools children in Mersing town. Aside, there was a request of cooperation to clean the main road at Felda Tenggaroh 3 [dated 15<sup>th</sup> April 2019]. The auditor has also seen a request of sponsoring the Kemas student [kindergarten] for the competition

in Kota Tinggi dated 11<sup>th</sup> July 2019.

**Tenggaroh 13 estate.**

Recite Qur'an and lecture was conducted on December 2019; assistance to Tenggaroh School on November 2019; and assistance for religious activities on December 2019.

**Tenggaroh 11 Estate.**

Assistance for Lecture conducted on December 26, 2019 located at AN-NUR FELDA mosque, assistance for office vehicle loan on July, 2019; and others.

**Status: Comply**

**4.4**

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

**4.4.1**

Area managed by FGVP (Tenggaroh 9, Tenggaroh 11 and Tenggaroh 13) is included in Map of Rancangan Felda Tenggaroh with area 37,094 acre (15,011.409 Hectare) including Tenggaroh Timur 02, Tenggaroh 13, Tenggaroh 12, Tenggaroh 11, and Tenggaroh 09. The area is under agreement between FELDA and Kerajaan Negeri Johor dated 19 December 1974. Sighted the Hakmilik Sementara with status for agriculture [oil palm] – 99 years under Felda. Based on the area statement and land title review, it was known that operational area of FGVP Tenggaroh 09; Tenggaroh 11 and Tenggaroh 13 has covers area for about **6,643.24 ha**. Sighted a proof of tax payment for each of land ownership under Tenggaroh 9, 11 and 13.

KKS Tenggaroh building and facility area is under *Perjanjian Antara Lembaga Kemajuan Tanah Persekutuan* (FELDA) and FPISB on *Rancangan Felda Tenggaroh* dated 25 November 1996. It was stated in that: by an Agreement dated 2nd day of December 1995 (hereinafter referred to as the said Principal Agreement” between FELDA and FELDA MILLS CORPORATION a corporation established pursuant to the Felda Mills Corporation Order 1975, hereinafter to as “the Corporation”), FELDA agreed to grant to the Corporation a license to occupy a portion of land situated within an area identified as Tenggaroh scheme measuring approximately **20.36 hectares** whereon a building has been built for the purpose of oil palm mill and such other related purposes on terms and conditions set out therein. The license granted to the Corporation is for a period of thirty (30) years Commencing on the 1st of January 1994 and shall expire on the 31st of December 2023.

**4.4.2, 4.4.3, 4.4.4, 4.4.5, 4.4.6**

Since the land is owned by the Kerajaan and leased to FGVP, so that there was no land compensation conducted to communities/other rights. The company (FGVP) has procedure for compensation calculating (ML-1A/L2-PR12(0) issued in March 2012, which is describing the process of settlement with the involved of affected parties, a;so involved the government agency such as Pejabat Tanah dan Jabatan Kemajuan Orang Asli (or the land government agency and the origin communities government agency).

During field visit, sighted the estate not adjoin with any smallholder's plantations, government reserve, villages nor with government reserve forest. There is no evidence collected during this audit period for any legal, customary or user rights.

Sighted the boundary map in all estates which informs number, scale, blocks, number of stones and coordinate:

- Tenggaroh 9 estate, area of 3116 Ha.
- Tenggaroh 11, map scale of 1: 53000
- Tenggaroh 13, lot / measure FGV map Tenggaroh 13 scale of 1: 11500 mm

**Status: Comply**

**4.5**

**No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.**



<p><b>4.5.1, 4.5.2, 4.5.3, 4.5.5, 4.5.6, 4.5.7, 4.5.8</b></p> <p>There is no new planting or new acquisition under Tenggaroh 9, 11 and 13 since 2005. No communities nor individual has any implications for the legal status of their land or have been disputed since FGVP has legal land titles by Johor States or leased by leased by Felda to FGV for 99 years. Sighted the document of <i>Hakmilik Sementara sesuai Kanun Tanah Negara</i> for the entire operational area.</p> <p>Area managed by FGVP (Tenggaroh 9, Tenggaroh 11 and Tenggaroh 13) is included in Map of Rancangan Felda Tenggaroh. The area is under agreement between FELDA and Kerajaan Negeri Johor dated 19 December 1974. Sighted the Hakmilik Sementara with status for agriculture [oil palm] – 99 years under Felda.</p> <p>KKS Tenggaroh building and facility area is under <i>Perjanjian Antara Lembaga Kemajuan Tanah Persekutuan</i> (FELDA) and FPISB on <i>Rancangan Felda Tenggaroh</i> dated 25 November 1996, measuring approximately <b>20.36 hectares</b>.</p> <p>During the field visit, sighted the estate not reported with any smallholder’s plantations, government reserve, villages nor with the government reserve forest. There is no evidence collected during this audit period for any legal, customary or user rights.</p>	<p><b>Status: Comply</b></p>
<p><b>4.6</b>  <b>Any negotiations concerning compensation for loss of legal, customary or user 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.</b></p>	
<p><b>4.6.1, 4.6.2, 4.6.3, 4.6.4</b></p> <p>There is no communities nor individual has any implications for the legal status of their land or have been disputed since FGVP has legal land titles by Johor States or leased by leased by Felda to FGV for 99 years. Sighted the document of <i>Hakmilik Sementara sesuai Kanun Tanah Negara</i> for the entire operational area.</p> <p>FGVP has a Procedure for Reconfirmation and Settlement of Land Disputes in accordance with document No. FGV / ML-1A / L2-Pr10, Issue No. 1 Date 1 June 2016.</p> <p>Area managed by FGVP (Tenggaroh 9, Tenggaroh 11 and Tenggaroh 13) is included in Map of Rancangan Felda Tenggaroh. The area is under agreement between FELDA and Kerajaan Negeri Johor dated 19 December 1974. Sighted the Hakmilik Sementara with status for agriculture [oil palm] – 99 years under Felda.</p> <p>KKS Tenggaroh building and facility area is under <i>Perjanjian Antara Lembaga Kemajuan Tanah Persekutuan</i> (FELDA) and FPISB on <i>Rancangan Felda Tenggaroh</i> dated 25 November 1996, measuring approximately <b>20.36 hectares</b>.</p>	<p><b>Status: Comply</b></p>
<p><b>4.7</b>  <b>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 FPIC and negotiated agreements.</b></p>	
<p><b>4.7.1, 4.7.2, 4.7.3</b></p> <p>There is no legal rights of local people, customary or user rights, within the FGVP (9, 11, and 13) operation area.</p> <p>Area managed by FGVP (Tenggaroh 9, Tenggaroh 11 and Tenggaroh 13) is included in Map of Rancangan Felda Tenggaroh. The area is under agreement between FELDA and Kerajaan Negeri Johor dated 19 December 1974. Sighted the Hakmilik Sementara with status for agriculture [oil palm] – 99 years under Felda.</p> <p>KKS Tenggaroh building and facility area is under <i>Perjanjian Antara Lembaga Kemajuan Tanah Persekutuan</i> (FELDA) and FPISB on <i>Rancangan Felda Tenggaroh</i> dated 25 November 1996, measuring approximately <b>20.36 hectares</b>.</p> <p>FGVP has a Procedure for Reconfirmation and Settlement of Land Disputes in accordance with document No. FGV / ML-1A / L2-Pr10, Issue No. 1 Date 1 June 2016.</p>	<p><b>Status: Comply</b></p>
<p><b>4.8</b>  <b>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.</b></p>	
<p><b>4.8.1, 4.8.2, 4.8.3, 4.8.4</b></p> <p>FGVP has established the procedure for the Identification and Settlement of Land Conflicts in Accordance with Document No. FGV / ML-1A / L2-Pr10, Issue No. 1 Date 1 June 2016, including explaining:</p> <p>Obtaining a plantation area planned map with borderies</p> <ul style="list-style-type: none"> <li>• List of map of development areas to managed</li> <li>• Census, find and record all boundaries existing in the field and mark with hardwood</li> </ul>	



<ul style="list-style-type: none"> <li>• Marking of boundary position must be conducted by a licensed surveyor</li> <li>• Border monitoring should be supervised to ensure missing due to machinery intrusion or intrusion</li> </ul> <p>Based on the statement area, field observations and interviews with the community surrounding, known that there are no land disputes within the Tenggaroh area 11, 9 and 13.</p>
<b>Status: Comply</b>
<b>PRINCIPLE #5 SUPPORT SMALLHOLDER INCLUSION</b>
<p><b>5.1</b>  <b>The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.</b></p>
<p>The company has no smallholders' scheme.</p> <p>The current prices for FFB has been installed in front of the weighbridge office and will be updated if there is a change in price according to the actual price.</p> <p>During the audit at KS Tenggaroh, it was verified that the contracts related to FFB Suppliers for FGV Tenggaroh Mill is not sighted. Hence the auditor unable to verify the specific clauses related to the legal requirements that should be stated inside the contract. Mill Management unable to show the contract documents for the FFB Suppliers. Its has been non-compliance in indicator 2.2.2.</p> <p>There is socialization of group sustainability policy to FFB Superdealer include indepent smallholders date on September 5<sup>th</sup>, 2019. In accordance to SOP-FGV/ML-1A/L2-Pr13 (Complaint &amp; Grievances), the mill shall respond to any enquiries from external stakeholder's within 14 days and within 7 days for internal stakeholder from date of recipients.</p>
<b>Status: Comply</b>
<p><b>5.2</b>  <b>The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.</b></p>
<p>The company has no smallholders' scheme.</p>
<b>Status: Comply</b>
<b>PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS</b>
<p><b>6.1</b>  <b>Any form of discrimination is prohibited.</b></p>
<p><b>6.1.1.</b>          Based on Group Sustainability Policy with number FGV/SED/POL/001 revision 3 date on May 29, 2019.</p> <ul style="list-style-type: none"> <li>• Responsible employment → all employees and workers shall receive equal treatment based on their relevant merits and competency regardless of gender, race, nationality, religion, age, physical condition and marital status, reproductive rights of women, union membership/affiliation/employment status or political affiliation.</li> </ul> <p><b>6.1.2.</b>  <b>Tenggaroh Mill</b>          There is no foreign workers in Mill. All workers is permanent workers from Malaysia (68 workers).</p> <p>Based on interview with pesticide applicator in Blok 13 S Tenggaroh 9 Estate (2 India workers and 3 Bangladesh workers) and harvesters in Block 10/11 Tenggaroh 13 Estate (2 Bangladesh workers and 1 Indonesia workers); harvester in Block 05 Tenggaroh 11 Estate there have not been discriminated against including charging of recruitment fees for foreign workers.</p> <p><b>6.1.3.</b>          Based on interview with management representative and workers, recruitment selection, hiring, access to training and</p>

promotion area based on skills, capabilities, qualities and medical fitness necessary for the jobs available. Example: Promotion date on June 17<sup>th</sup>, 2019 on behalf Azahar Bin Ahmad (45) 010/HQ/8401/1202069 General Administration di Moakil Mill become electric chageman Tenggaroh Mill since Juli 1<sup>st</sup>, 2019. Approved by *Ketua Sumber Manusia Operasi Perkilangan*. Based on interview with management representative workers promotion is according with competency. There is promotion letter on January 7<sup>th</sup>, 2019 on behalf Intan Suhailah become store clerk in Tenggaroh 9 Estate from January 15<sup>th</sup> 2019.

**6.1.4.**

Based on field observation in manual workers in Block 19/001 Tenggaroh 13 Estate (7 women workers), there is no pregnant woman working in this area so there is no pregnancy testing. There is a prohibition on hiring pregnant women in high risk and chemical areas.

**6.1.5.**

There is minutes of meeting of gender committee of Tenggaroh 11 Estate on December 20, 2019 (19 woman workers). Structure of gender committee in period 2019, Chairman (1 person), secretary (1 person), Department of Labor (1 person), AJK 2, AJK 3, AJK 4, & AJK 5.

Based on interview with woman workers (7) in manual workers in Block 19/001 Tenggaroh 13 Estate, they have been know related gender committee. During audit, there is no complaint related harassments sexual. In each estate, there is gender committee structure.

**6.1.6.**

Based on pay slip on December 2019 for general workers (2 people) they have equal for basic pay as much as RM 1100.

**Status: Comply**

**6.2**

**Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).**

**6.2.1 & 6.2.2.**

**Local workers.**

There is CLA between FGV Palm Industries SDN BHD with labour union of FGV Palm industries SDN BHD Semenanjung from January 01<sup>st</sup>, 2019 until December 31<sup>st</sup>, 2021. Consist of:

Clause 15 Deduction

Clause 16 term of service for employees of FELDA or Company.

Clause 17 Promotion / Grade.

Clause 18 Salary level

Clause 19 Annual salary increase

Clause 20 Notice of resignation

Clause 21 Resignation / vacancy without notice

Clause 22 Termination of employment

Clause 25 Disciplinary procedures

Clause 28 Working hours

Clause 29 Working overtime

Clause 30 Holidays

Clause 31 Training facilities

Clause 34 Benefits (Housing, hardship, responsibility, turn, division head, laundry, motorcycle and area).

Clause 35 Project incentive payment

Clause 36 Annual bonus.

For foreign workers there is agreement between FGV Plantations (Malaysia) SDN BHD and foreign workers. Example: The contract is for 2 years and is renewable for 1 year and does not exceed 10 years by mutual agreement between the manager and the employee. In the contract of employment is defined as contract period, type of work and location, working hours, hire / pay, housing / work facilities, transportation, health and medical examination, appliances,

occupational equipment, passports and labor, employment insurance, deceased workers Employee leave, employee passport retention, job loss, termination of employment contract, and others. This contract is using language accordance with the origin of the worker.

**6.2.3.**

Based on interview with harvesters in block 10/11 Field PM 00C Tenggaroh 13 Estate, Harvesters in block 46/07 Tenggaroh 9 Estate and Harvesters in block 05 Tenggaroh 11 Estate. They have been working from 8 hours with 1 hour for rest. They get subsidies for water and electricity facilities (RM 6 for electricity and RM 4 for water), if they work on holidays they get double pay and if they work overtime they pay according to the terms. They also get holiday leave. Based on interview with harvesters in block 46/07 Tenggaroh 9 Estate, Block 05 in Tenggaroh 11 Estate, pesticide applicators in Block 03 PM 05 Tenggaroh 11 Estate and fertilizer applicators in Block 16 Tenggaroh 9 Estate there is no deductions directly for contractor. There are payslip for each workers and the deductions has been explained such as Cooperative, insentive for family or group, employee EIS, Employee Epf, & Employee socso.

**6.2.4.**

The quarters provided are according to FGVM Standard housing amenities and in accordance with Malaysian regulation. Workers are also provided with basic facilities such as bedsheet, pillows, pillowcases etc. for their living convenience. Field observation to the workers housing (*Perumahan Pekerja Kilang Tenggaroh*) had confirmed that the housing is generally well-maintained. Interviews with workers at the housing also reveal that the housing facility is adequate and that communal clean-ups are conducted periodically. There is regular solid waste disposal system and routine maintenance for the upkeep of housing area.

Based observation visit, in housing area in Tenggaroh 9 Estate, the company considered to improve the hygienic sanitation facilities in housing area especially in Tenggaroh 9 Estates (**OFI**).

**6.2.5.**

Based on field visit and interview with operator boiler and grading, there is canteen in mill area with affordable, adequate and sufficient food. Based on interview with and field visit in Estate area, there is available food stalls providing affordable and sufficient food. In housing area there is list price for groceries.

**6.2.6.**

Based on interview and document review, the company had revised the minimum wage for the mill as per Collective agreement and minimum wages stipulated by Malaysian Government in 2019 which stated RM 1100.00 as minimum wages. There is a meeting made in Wisma FGV dated 28<sup>th</sup> November 2018 which discussing the Nomination and Remuneration Committee Matters clause 8.4) 2019 Salary Increment and Minimum Wage Implementation Proposal – resolved that *‘any employees where current basic salary is less than RM 1100.00 after receiving salary increment and salary adjustment be adjusted to RM 1100.00 effective 1<sup>st</sup> January 2019’* verified by the company secretary.

There is payment slip for Kernel plant operator, on December 2019 with basic pay is RM 1,245, Insentif project is RM 120 and others. Total payment before deduction is RM 2,112.15 and deductions as much as RM 643.06 (Cooperative, insentive for family or group, employee EIS, Employee Epf, & Employee socso). So the net salary is RM 1,469.09. Based on payment slip in December 2019 as a General workers with basic income is RM 1,202.13 and other income RM 708.25. Total income RM 1,910.38. Nett pay 1,837.38.

Based interview with harvesters in block 10/11 Field PM 00C Tenggaroh 13 Estate, Harvesters in block 46/07 Tenggaroh 9 Estate and Harvesters in block 05 Tenggaroh 11 Estate. They get a base salary of over RM 1100; if they work on holiday they will get double and if they work overtime they will get accordance with terms of the company (1.5 X wage for 1 hour for weekday and others).

**6.2.7.**

All workers in Mill are permanent workers with total 86 workers. There is no contractor and local workers. For foreign workers they work accordance with the contract is for 2 years and is renewable for 1 year and does not exceed 10 years by mutual agreement between the manager and the employee.

	<b>Status: Comply</b>	
<b>6.3</b>		
<b>The unit of certification respects the rights 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.</b>		
<b>6.3.1.</b>		
The company had policy on respecting the workers' rights such as to form a trade union. The union minutes of meeting for the mill workers available and the request by the union will be attended in timely manner. The management always support and encourage the workers to involve the trade union and sending them to the union meeting yearly.		
<b>6.3.2.</b>		
There is minutes of meeting of labor union at Tenggaroh Mill on October 10, 2019 location in Tenggaroh Meeting Room (8 people). It discussed such as the inauguration of the new treasurer, housing improvements in mill area, gathering holidays, family days and annual bonuses, office cleaning, disciplinary action for employees who do not work for 2 days in a row, corporate profits are declining, and others so. These meetings are conducted once every 6 months. Tenggaroh 9 Estate.		
Minutes of meeting on September 2019 located in Tenggaroh 9 Estate meeting room, the participants are 11 people (Head of labor union, Secretary, Bangladesh representative workers, Indonesia representative workers, India representative workers and others).		
Minutes of meeting on October 16, 2019 located in Tenggaroh 11 Estate meeting room, the participants are 16 people (Head of labor union, secretary, Local representative, Indonesia representative, Bangladesh representative, translator for each country, woman representative and others).		
<b>6.3.3.</b>		
Based on interview with harvester, pesticide applicator and fertilizer applicator there is no interfere from the company related formation or operation of registered unions/labour organization or associations, and they freely elected representatives for all workers including migrant and contract workers.		
	<b>Status:</b>	
<b>6.4</b>		
<b>Children are not employed or exploited.</b>		
<b>6.4.1.</b>		
There is memo <i>sumber daya manusia nomor 35/2019</i> related prohibition employ workers under 18 years old in Mill Area. Mill management should ensure that no workers (both in contract of employment and others) or individuals under the age of 18 are in the mill area. On December 2, 2019 the Chief of Human Resources approved the manufacturing operation and there is Group Sustainability Policy with number FGV/SED/POL/001 revision 3 date on May 29, 2019.		
<b>6.4.2.</b>		
Based on the field verification and cross checking with the workers list, it was verified the employment for workers are above 18 years old as per Malaysian Government regulation on Employment Act 1955. The company had set the system for FGV that will filter out the age based on the Identification card number and birth of date that will only employ the employee based on the minimum age regulated by Malaysian Government. Based on list workers for Mill in 2020, there is no workers under 18 years old. The youngest workers is 20 years old as loading ramp worker date of birth is February 22 <sup>nd</sup> , 2000.		
<b>6.4.3.</b>		
There is no young person worker in this mill. The youngest workers is 20 years old as loading ramp worker date of birth is February 22 <sup>nd</sup> , 2000. Based on list workers for Estate 11 Tenggaroh in 2020, there is no workers under 18 years old. The youngest workers is 20 years old as general worker date of birth is December 31 <sup>st</sup> , 2000. Based on field visit in harvesting area Block 5 and pesticide activity there is no workers under 18 years old. Based on field visit in Tenggaroh 09, Tenggaroh 11 and Tenggaroh 13, there is no workers under 18 years old.		

<p><b>6.4.4.</b> Socialization of group sustainability policy to FFB Superdealer date on September 5<sup>th</sup>, 2019. (Bingan Jaya Bhd, Eng Huat Latex concentrate, Kim Ma oil Palm and Swng Highland Fruits Trading).</p>	<p><b>Status: Comply</b></p>	
<p><b>6.5</b> <b>There is no harassment or abuse in the workplace, and reproductive rights are protected.</b></p>		
<p><b>6.5.1 &amp; 6.5.2.</b> Based on Group Sustainability Policy number FGV/SED/POL/001 date on May 29, 2019. Gender Equality and preventing sexual harassment and violence.  <ul style="list-style-type: none"> <li>- FGV Group is committed to the principles of non-discrimination and gender equality.</li> <li>- FGV Group shall not tolerate any form of sexual harassment violence and abuse.</li> </ul> <p>This policy has been displayed on the office and information board.</p> <p>Based on minutes of meeting of gender committee there is socialization on December 20<sup>th</sup>, 2019 in Tenggaroh 11 Estate (19 people). Material discussed is sexual harassment policy and reproductive rights and others.</p> <p>Based on interview with woman workers (7) in manual workers in Block 19/001 Tenggaroh 13 Estate, they have been know related gender committee. During audit, there is no complaint related harassments sexual. In each estate, there is gender committee structure.</p> <p><b>6.5.3.</b> Based on field visit, There is no new mother in mill area and field visit in each estate, there is no new mother.</p> <p><b>6.5.4.</b> Based on document review A grievance mechanism, which respects anonymity and protects complainants has been include in FGV Policy of Gender Equality and preventing sexual harassment and violence. Based on interview with woman workers (7) in manual workers in Block 19/001 Tenggaroh 13 Estate, there is no complaint related harassments sexual.</p> </p>		
<p><b>Status: Comply</b></p>		
<p><b>6.6</b> <b>No forms of forced or trafficked labour are used.</b></p>		
<p><b>6.6.1 &amp; 6.6.2.</b> <b>Tenggaroh Mill.</b> All workers in Mill are permanent workers with total 86 workers. There is no contractor dan local workers. Based on interview with harvester in block 46/7 and pesticide applicators in block 16 (foreign workers), there is no forms of forced or trafficked labour are used. Passport has been locked in the ladang office but the key its keep by the workers. If they have to take leave days they can use the passport and recommendation letter to go outside Malaysia. There is no contact substitution. Overtime has been paid to the company, if they work on the weekend (Friday) they will be paid double.</p> <p><b>Tenggaroh Estate.</b> <b>Foreign workers.</b> There is FGV Group Guidelines and procedures for responsible recruitment of foreign workers with policy number FGV/FGVPM-JTK/POL/001 on June 27<sup>th</sup>, 2019. This guidelines are contain foreign workers requisition, pre-employment, employment, and post-employment. Based on interview with management representative, this procedures has been implemented in each area.</p>		
<p><b>Status: Comply</b></p>		
<p><b>6.7</b> <b>The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</b></p>		

**6.7.1**

Sighted the organizational chart for FGV Tenggaroh – Health and safety officer [Mr Izzul] from regional office that will be the responsible personnel. Based on the meeting occupational safety and health sighted dated 25<sup>th</sup> October 2019 at meeting room , attended by the manager , secretary, assistant manager , AJK and FGV Trading.

Sighted the meeting latest conducted on 11<sup>th</sup> September 2019 at meeting room FGV T9 attended by 22 workers and managers which include the chairman, regional safety officer, secretary , employer representative , local workers representative , nursery worker representative- [nursery license number 600596011000]. Based on the minutes meeting recorded in each of unit, the Quarterly meeting been conducted and the discussion is about safety working practices and accident report. Sighted also each unit had reported the accident in the estate [if any] to Department of Safety and Health Malaysia by submitting in JKPP 6 and JKPP 8 form to the authority.

**6.7.2 and 6.7.3**

The Safety & Health Officer was interviewed and the safety and health committee meeting conducted on quarter yearly basis. Active two-way communication observed from worker and employee representative. Latest Safety and Health meeting conducted on 26<sup>th</sup> August 2019. Emergency Preparedness & Response team is available as stated in the SOP (No. Dokumen FGVPM/L2/PP-08). Total 3 first aider sent for training in Tenggaroh 13.

Sighted the emergency procedure being displayed at the area of fertilizers. Which include :

- i) Action plan for the estates
- ii) Minor injury → fall, minor cut and fainted → mandore / competent person to start early treatment → to be send to the hospital for futher treatment
- iii) Burned / poisoned → source of danger need to be separated → assistant / competent mandore will conduct early treatment to the victim → estate manager will arrange the patient to the nearby hospital /clinics for further treatment

The mill management had a PPE issuance record [ Lampiran FPI – PK -037]which listed the name , quantity received, date of received , signature , and dates return , including the signature . sighted the record of each workers being provided PPE including one which working in loading ramp, operational, kernel plant, capstones and Loading ramp Based on the document verification sighted the PPE had been issued by the Mill for free. Once the PPE is damaged they allowed to change the PPE for a new one and the Safety shoes allowable for changing twice a year.

Sighted the record of PPE issuance and return by FGV which include 114 workers :

- 1) Harvesting – wellington boots, sickle cover and gloves
- 2) Spraying – mask, apron
- 3) Manuring – mask N95 , gloves and apron.

Sighted the sanitation for the worker to change and wash the clothes had been provided at the estate FGV T13 which include place for the washing etc. sighted in the estate.

**Non-Conformance Description & Evidence observed :**

During the field observation at FGV Tenggaroh 9, it was observed that 5 workers are not wearing the safety boots provided by the estate management. Based on the interview, it is known that the workers are “self-purchased” the shoes by themselves. In the company’ SOP stated that the PPE are provided to workers in free of charge. Based on interview with management representative stated that the PPE are provided to all workers as per scheduled. Based on the interview and stock verification at Tenggaroh 11, it was found that there are lapses in safety shoes return and receive system.

Refer to explanation above, the workers are not using the appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work. **It's become NCR No.2020.04 with critical category.**

**6.7.4 and 6.7.5**

FGV PM and FGV PISB had provide the insurance to the staff and workers. Sighted the insurance for the Malaysian Staff by “PM Care” and for the foreign workers are SOCSO. The medical care provided by panel clinic in Kota Tinggi which are *Klinik Adham , Klinik Muiz and Poliklinik Penawar* and the system is by showing the number of workers [FGV Workers]. Sighted The insurance by PM Care for operational cost of 50,000.00, [operation Rm 5000.00 and Warded for 45,000.00] for FGV Staff. All the cost incurred will be Bourne by the FGV Palm Industries Sdn Bhd



Sighted the LTA been recorded into report JKPP 8 (1) / IV → which include workers from Bangladesh (L) 42 years old → Bangladesh harvester → FGV contract worker → dated 15<sup>th</sup> December 2019 → time of incident → Incident happen during the transport back home

Sighted JKPP 6 Accident report dated 18<sup>th</sup> December 2019 [*laporan mengenai kemalangan / kejadian berbahaya*] occupational safety and health which located at BLOK 18 PKT PM 00 E → sighted the report by Mr Azizul 16<sup>th</sup> December 2019 for 16 days of medical leave and cost will be covered by FGV management

**Status: Comply**

**PRINCIPLE #7 PROTECT, CONSERVE AND ENHANCE ECOSYSTEMS AND THE ENVIRONMENT**

**7.1**

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

**7.1.1**

The IPM on estates is adopting procedure No. MSL (Ed. 2) Vol. I - Sec. 3 and No. MSL (Ed. 2) Vol. I - Sec. 4, for IPM in immature and mature palm plantation. Threshold for rat census is <20%, census for caterpillars and ganoderma is done if visually there are signs of attack, if there is an attack the application of chemicals will be carried out. During the audit there were no ganoderma attacks on all three estates, there was a rat attack (control was carried out), there were no fire caterpillars on Tenggaroh 9 and Tenggaroh 11 while found in Tenggaroh 13.. Sighted the IPM program in the three estates, such as: rat census, *butik* screening program, owl census, training for IPM officers, planting of beneficial plants, fire caterpillar census, applications for caterpillar attacks, ganoderma census, and ganoderma sanitation removal program

Control has been carried out by estates in accordance with SOPs owned, such as rats censuses and campaigns conducted twice a year, for example in Tenggaroh 9 conducted in July 2019 in field PR18V (immature area), percent of manifestation 25%, the application of the chemical chloropacinone has been carried out. Census are re-conducted in 2 weeks after the application with a result of 5.45%, so there was no need to reapply.

Sighted the owl monitoring records for 2019 in all estates, for example owl monitoring records in Tenggaroh 13 as of December 2019, the number of owl nests is 32 boxes, and the number of box occupied is 11.

All estates was handled bagworm attacks three times a year in 2019, controls done by trunk injection, early detection carried out visually by the foreman. Control records can be seen during audit, for e.g. in Tenggaroh 11 on May 2019 in field of P07P (11407 trunks), the type of chemical materials used is acephate (75%), a total of 88 kg. The application was repeated in Oct 2019 at 10200 trunks (90 kg), and in Nov 2019 at 3000 trunks (30 kg).

Can be shown the record of planting beneficial plants for the period 2019, for example in block 5 Tenggaroh 11 to December 2019 planted 42.48 Ha. During field observations were seen planting beneficial plants such as *Turnera subulata*, *Cassia cobanensis* and *Antigonon leptopus* along the collection road.

**7.1.2, 7.1.3**

Estate management does not use species referenced in the Global Invasive Species Database and CABI.org in order to control pests and diseases, and there were no pest control using fire, all pest controlled by chemical and biological enemy.

**Status: Comply**

**7.2**

**Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.**

**7.2.1, 7.2.2, 7.2.3, 7.2.4, 7.2.5**

The CH has justification of all pesticides used, it was describes in the letter from head of compliance and certification department on 27 Sept 2019 to EM on "*makluman pemansuhan dokumen justifikasi penggunaan bahan kimia*", which stated that document ML-1A/L3-GP1(0) are used as justification of pesticide used. All pesticide used were listed on Approved List of Pesticides Registered for Oil Palm (April 2007). The types of pesticides used by the company, including:

- Herbicide: glyphosate, paraquat, glufosinate, metsulfuron methyl, thichlopyr, sodium chlorate.
- Pesticide: chloropacinone, bromodilone
- Insecticides: Cypermethrin, cythrin, lambda-cyhalothrin, cyperway, contest, unicide, propanol, thiram and

metaldehyde.

In order to avoid P&D (include weeds) resistance and prophylactic uses of pesticide, estate management had substitute and/or rotate the use of pesticides for the same target.

The company has monitored the use of pesticides including LD50, usage records are presented in the document of pesticide uses record and monthly manager report, usages from 2015-2019, informing the name of the active ingredient, % a.i., consumption a.i./ha and a.i./ton. For example the use of Isoprophyl Amine Glyphosate in Tenggaroh 9 for 2019 was 0.89gr / ha, Tenggaroh 11 was 0.095gr / ha and Tenggaroh 13 was 0.008gr / ha.

In reducing the use of pesticides, the company has use of natural enemies in handling pests such as the use of owls to overcome rat attacks and beneficial plants in dealing with fire caterpillars.

The company no longer uses paraquat, according to a letter from the Chief Executive Officer of FGVP Sdn Bhd dated May 8, 2019 no. : (27) 010810 / HQ / JAB.OP.17 / PLANTATIONS / AM explaining that FGVP no longer uses herbicides with active ingredients of paraquat dichloride. Also, based on record of pesticides usage for periode of Jan-Dec 2019, there is no pesticides listed in WHO Appendix 1A, 1B and/or listed in Stockholm or Rotterdam Convention.

#### **7.2.6, 7.2.7**

The CH has conduct CHRA which hold by ENV Consultancy and Monitoring Services Sdn Bhd on Jan 2017 for Tenggaroh 9, Tenggaroh 11, Tenggaroh 13. Procedure for Chemical handling, FGV/ML-1A/L2/PR19 dated 1/6/2016 observed.

Trainings records of pesticides applicator are sighted in the three estates, such as:

- Trainings of pesticides operators are planned to be done annually, sighted the record of training in Tenggaroh 9 held on 18 April 2019 to 27 operators.
- Training of pesticides operator in Tenggaroh 13 conducted on 26 Aug 2019 to a total of 25 operators.

During the site visit to spraying activity, observed that sufficient PPE such as apron, glove, google, safety boot, provided by management. Based on observation to chemical store the precautions method for potential accident on chemicals application has refers to Chemical Health Risk Assessment (CHRA) and Safety Data Sheet (SDS) of products.

Based on field visit to chemical spraying activity in Tenggaroh 11, observed that there was an pure chemical brought to field namely chemical Ally, the justification are provide by the EM which is stated that the type of those chemical are cannot to be mixed in the previous day, since it effectivity will be reduced. The EM has issued the instruction letter on "*arahan larangan membawa dan membancuh racun Ally di ladang*". Monitoring and implementation of the instruction letter will be verified in next assessment. **OFI**

#### **7.2.8, 7.2.9**

Proper management of triple rinse including the chemical washing and PPE store at the estate observed. Sighted the record of pesticides containers handling for 2019 in the form of matrix table. Based on th FGV manual procedure FGV/ML-1A/L2- Pr 4, clause 6.4.1 "used poisonous containers can be recycled after rinsing 3 times and punched holes under it" - The rinsed containers should be stored in a roofed and locked store before handed over to the clause recycling contractor.

- Record "*bilangan 3 kall*" on 26 Spet 2019 as much as 165 pcs in Tenggaroh 13, and delivered to SS setia teknologi enterprises.
- Tenggaroh 11 are reused the containers for the same activity, sighted the record for December 2019, total generate as much as 14 pcs and total use for same activity as much as 14 pcs.

Based on field observation and information form estate management, it was informed that there were no pesticide application by plane through the air. All pesticides has applied through spraying and trunk injection.

#### **7.2.10, 7.2.11**

Annual medical health surveillance program for work unit operators (WU 1 & WU 5), who have risk of exposure to Schedule II chemical such as Pesticides/Herbicides were available. The medical surveillance are conducted based on recommendation of CHRA result which done by ENV Consultancy and Monitoring Services Sdn Bhd on Jan 2017 for Tenggaroh 9 and Tenggaroh 13. CHRA for Tenggaroh 11 conducted by Occumed Consultancy & Services Sdn Bhd on April 2016.

The type of test: blood, spirometry, urine, CHE, no workers found with abnormal result in three estates.

- **Tenggaroh 9**, are held on 13, 14, 15 and 20 May 2019 to 69 operators
- **Tenggaroh 13**, to as much as 14 workers.
- **Tenggaroh 11**, held in 29 Oct – 5 Nov 2019 for 28 workers.

The company has policy which mentioned that pregnant and breastfeeding women are prohibited to work related to agrochemicals (included pesticide). There are no women applicators in Tg 9 and Tenggaroh 11.

Based on the list and interview with workers, known that there are women workers in the Tenggaroh 13 who is involved in pesticide activity as much as 9 workers, regarding to this, the estate management has issued the letter to all operators (bil 02 / E1. 5.7) which explains that each worker must inform management if they are pregnant or breastfeeding. During field observations and interviews with sprayers they were not found breastfeeding or pregnant.

**Status: Comply**

**7.3**

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

**7.3.1**

Sighted the waste management for scheduled waste including the notification to DOE dated January 2020 which been categorized into waste category code :

- i) SW 102 → battery → generated 0.0 → total balance 0.00
- ii) SW 305 → lubrication Oil → 0.1 → total balance 0.00
- iii) SW 306 → hydraulic Oil → 0.0 → total 0.00
- iv) SW 322 → N- Hexane → 0.00 → total 0.00
- v) SW 409 → Empty Container → 0.0 → 0.100
- vi) SW 410 → Glove and Filter → 0.065 → 0.100

Based on the notification from DOE, the data been recorded on 12<sup>th</sup> January 2020.

Waste management plan been had been completed to reduce the impact towards environment and control waste such as :

- i) source → smoke form the lorry → monitoring inspection of the lorry
- ii) Business Impact → loose fruit spillage → loose fruit harvesting depends on FFB received
- iii) Depletion natural Sources → diesel usage by the machineries / tractors → continuous monitoring record of diesel
- iv) Land contamination → lubricant spillage → periodic monitoring of machineries and servicing at the proper area

Sighted the plan for the EKAS to be the collection center located at FGV T13 – by Mr Abdul Ghafar Nordin (*SHO wilayah*) [longitude – 103.9260001, Latitude – 2.2635516] which assigned Tenggaroh 13 to be the center of scheduled waste handling for the estate FGV T9 , T13 and T11.

The company had recorded the “disposed and received empty pesticides container” on December 2019 which include details :

- i) Spent container in [until date / to date)
- ii) Spent container produced [sold/disposed / reused in the estates)
- iii) Remaining empty container
- iv) Notes

Sighted the record of inventory of scheduled waste for 5<sup>th</sup> Schedule (year 2019 ) for FGV Tenggaroh 11 :

Dates	Category of SW	Name of SW	Quantity SW generated	Handle SW : Kaedah	Quantity in Metric	Place
30 <sup>th</sup> October 2019	SW 409	Used PPE	0.001	In store	0.001	Tenggaroh 11
25 <sup>th</sup> November 2019	SW 409		0.001	In store	0.001	T11

3/12/2019	SW 409		0.0005	In store	0.0005	T11
5 <sup>th</sup> December 2019	SW 409		0.0005	In store	0.0005	T11

**7.3.2.**

Sighted the mill's SOP for the schedule waste "*Procedur Pengendalian Bahan Buangan Terjadual*" reference FPI / L2 / QOHSE – 9.0 -dated 15<sup>th</sup> September 2014 FPISB that include objective, scope of procedure, responsibility, reference, procedure, handling and disposal of scheduled waste (empty drums), handling of scheduled waste using pump and the storage area of scheduled waste as per Director General requirement. Sighted the manual procedure include details procedure such as "identification and separation of waste material", "recycling of waste material and reused" and etc. Sighted evidence of consignment note the disposal of waste material 6 packet of 55 gal drum (SW 305) 9 pallet of SW 409 with quantity 0.3 MT, for the mill dated 13<sup>th</sup> July 2019 with quantity of 0.7 MT to Kualiti Alam Sdn Bhd.

Sighted also the proper disposal of scheduled waste dated 13<sup>th</sup> July 2019 which include :

- i) 55 Gal Drum → 0.7 MT SW 305 → that been collected by the FGV certified collector → incineration amounted 1.0860 MT [consignment note 13<sup>th</sup> October 2019 ]
- ii) SW 409 – Disposed containers – 0.3 MT → Empty Container
- iii) SW 410 – Rags Plastic s, paper / filters contaminated with SW → amounted 0.1 MT

Sighted also the schedule waste collection temporary at the estate store that kept following waste according to fifth schedule "*Akta Kualiti Alam Sekeliling*" 1974 that categorized the waste into :

- i) Dated
- ii) Category of scheduled waste item
- iii) Name of waste
- iv) Quantity of metric tonned produce
- v) Handling of schedule waste → method , quantity and location

Details of the handling material as follows :

- i) SW 409 → date produce 25<sup>th</sup> October 2019 → Spent PPE → 0.0002 → storage → FGV T9
- ii) SW 409 → date 10<sup>th</sup> November 2019 produce → Spent PPE Item → 0.0003 → store at FGV T9

The waste had been sent into recycling center – *Awallud Trading* dated 6<sup>th</sup> December 2019 which include 75 Nos of spent container and total price of RM 37.50.

Sighted also disposal of waste material which include :

Empty pesticides in	Sold	Dated
Herbicides pump	4	10/11/2019
Empty container	20	10/11/2019
Empty garlon	40	10/11/2019
Empty Ally container	15	10/11/2019

**7.3.3.**

**Non-Conformance Description & Evidence observed (filled by auditor):**

During the field visit at FGV Tenggaroh 9 housing complex, it was observed 3 traces of burning rubbish located at the backyard of Hostel area. Hence, the evidence observed are against the indicator 7.3.3 (does not use open fire for waste disposal). **It's become NCR No.2020.05 with Non-critical category.**

<b>7.3.3</b>	<b>Status: NCR No.2020.05 with Non-critical category.</b>
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**7.4**

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

**7.4.1, 7.4.2**

Procedure of soil fertility management was presented in several documents, as follows:

- Document No. MLSL (Ed. 2) Vol. I – Sec.5 (1.0 – 8.0) about oil palm manuring (chemical fertilizer).
- Document No. MLSL (Ed. 2) Vol. I – Sec.3 (3.0 – 4.0) about EFB application and Felda mulching.
- Agronomist Recommendation for EFB application in mature areas.
- Procedure of Leaf and Soil sampling (Manual for Staff).

During field visit to all estate, it was observed that the company has conduct several strategy which aims to enhance soil fertility, such as: placement of fronds, manuring in accordance with the dose and rotation, and EFB application, as well as planting of legume cover crop (LCC) such as *Mucuna bracteata* and maintaining soft grasses in immature and terraces areas.

Sighted the procedure of leaf and soil sampling document No. MLSL (D.2) – Sec 5 (4.0) which consist of oil palm manuring on mature area method, quality, suitability implementation, environmental, safety and reference. The procedure also mentioned that leaf and soil analysis were conducted to be used as a basis of annual manuring recommendation calculation. Both analysis were carried out annually by FASSB.

Leaf sampling analysis for fertilizer recommendation 2020 has been done on 24-26 Sept 2018, conducted by Felda Analytical Laboratory. Sighted the fertilizer recommendation for 2020 in all estates, presented in document of "*rumusan keperluan baja ladang tahun 2020*" (for e.g.: lab code for Tenggaroh 13: FRF20200078). Furthermore, soil analysis results could be used for five years. Last soil analysis has conducted in 2015 for example as shows in document No. FRF20160204 dated Februry 28<sup>th</sup> 2015 for Tenggaroh 13 Estate. This result applicable for manuring recommendation for period 2016 to 2021.

Leaf analysis includes dry matters percentage of nutrients on the leaf and rachis (N, P, K, Ca, Mg and B), while, soil analysis included pH, soil nutrient status and nutrients exchange cation capacity. Sighted the record of fertilizer for Jan 2020 in all estates, known that the fertilizing has been done in accordance with the recommendation, it also in line with the field observation.

**7.4.3, 7.4.4**

For nutrient recycling strategy, the company are applied Empty Fruit Bunches (EFB) mulching, dosage recommended by Agronomist were 10 and 40 ton EFB/ha/year for immature and mature area. EFB mulching in immature and mature areas were applied on palm circle; and inter-palms and/or inter-rows. Sighted the record of "*penghantaran tandan kosong*" in Tenggaroh 9, for e.g. application on 17 Nov 2019, total applied 495.9 MT, in PR18V. Record of EFB application shown by Tenggaroh 13, in Dec 2019 has been applied 34.57 MT, while in Tenggaroh 11 applied amount of 1503 MT.

The record of fertilizer for year of 2019 is observed in all estates in the document of "records of progress in work for maiden- works", based on documents known that the fertilizing has been done in accordance with the recommendations. It was inline with the field of observation result to estates for e.g., in block of 16 PM15T observed that the workers have understood regarding to the dosage of fertilizer, the way to blowing of fertilizer and that the estates has conducted the calibration of dose measurer regularly.

Based on field observations observed that the application of EFB has been carried out in accordance with the dosage, circular in immature plants and sprinkled in the inter-row on mature plants.

	<b>Status: Comply</b>	
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**7.5**

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

7.5.1, 7.5.2, 7.5.3

Tenggaroh 09 Estate, Tenggaroh 13 Estate and Tenggaroh 11 Estate management were able shows soil type, topography and elevation map with various scale (1:43,000 to 1:53,000) dated on September 30<sup>th</sup> 2015. The map informed that very steep area (>25°) was classified as steep stony area, which considered as fragile areas. For example in Tenggaroh 09 Estate, it was identified that very steep area for about 32.02 ha was located on field PM00G.

Oil Palm grown with permitted levels, based on the map sighted, there is no planting on sloping area. Sighted the replanting area with terracing and cover crop in Tenggaroh 09 Estate. Based on field observation and information from



<p>estate management, it was known that slope condition in Tenggaroh 09 &amp; 13 is dominantly hilly, followed by rolling. Estate management mentioned that area with slope more than 25° were still cultivated with terraces planting pattern technique which aims for soil and water conservation purposes. The sampled estate has no marginal and peat soils, the soil series are Beserah, Holyrood, Melacca, Renggam and Ulu Tiram.</p>	
<p><b>Status: Comply</b></p>	
<p><b>7.6</b>  <b>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.</b></p>	
<p><b>7.6.1 and 7.6.2</b>  Oil Palm grown with permitted levels, based on the map sighted, there is no planting on sloping area. Sighted the replanting area with terracing and cover crop in Tenggaroh 09 Estate. Based on field observation and information from estate management, it was known that slope condition in Tenggaroh 09 &amp; 13 is dominantly hilly, followed by rolling. Estate management mentioned that area with slope more than 25° were still cultivated with terraces planting pattern technique which aims for soil and water conservation purposes. The sampled estate has no marginal and peat soils, the soil series are Beserah, Holyrood, Melacca, Renggam and Ulu Tiram.</p> <p>Sighted the FGV T11 soil map and soil series for FGV Tenggaroh 13 which include the details :</p> <ul style="list-style-type: none"> <li>i) Marang – Apple – Blok 5</li> <li>ii) Renggam – hjerangau (R3M – JRA) – Blok 16</li> <li>iii) Renggam – Durian (R3M-DRM) – Blok 10</li> <li>iv) Pahat – Durian ( PHI – DRW – TW) – Blok 14</li> <li>v) Local alluvium – Blok 9</li> </ul> <p>Based on the document verification, interview and site visits at each estates, sighted no marginal soil observed and had been cross checked with the estate managers.</p>	
<p><b>Status: Comply</b></p>	
<p><b>7.7</b>  <b>No new planting on peat, regardless of depth after 15 November 2018 and all peat lands are managed responsibly.</b></p>	
<p>Based on the Document verification and field observation, sighted no peat area available in the estate.</p>	
<p><b>Status: Comply</b></p>	
<p><b>7.8</b>  <b>Practices maintain the quality and availability of surface and groundwater</b></p>	
<p><b>7.8.1</b>  As per requirement on Jadual Pematuhan, water quality testing need to be done at Sungai Pasir Panjang on monthly basis. An evidence of monitoring on 11 September 2019 has been done by the Tenggaroh Mill. Sighted also the management plan for Tenggaroh Mill (<i>Pelan Pengurusan Air 2019-Kilang Sawit Tenggaroh</i>), stated the 3 main issues. The water supply for mill operation is from surface water, approval (license of water river abstraction – BAKAJ/334/300/05/10/08/02, licensed number 08/A/Mg/004 dated 2019). Maximum extraction 400m3 per day. Tested parameters are within specified limits, such as PH - 8.06, BOD 3 days – 6, Total Solids – 21 and etc.</p>	
<p><b>7.8.2</b>  Based on the water management plan for year 2019, it was sighted that the action plan related to water management such as water supply is disconnected -&gt; ensure that SAJ has informed the water supply to be connected immediately -&gt; plantation officer and management JKKK -&gt; contact SAJ informing via rollcall. Leakage -&gt; checking each pipeline is in good condition -&gt; plantation officer and HEP -&gt; and etc. Sighted the evidence of river water quality test for Tenggaroh Complex – FGVPM Tenggaroh 09 and FGVPM Tenggaroh 13 sampled from Sungai Ambat. FGVPM Tenggaroh 09,</p> <p>Based on site verification on PR18B, PM07L, and FGVPM Tenggaroh 13 on PM00E and PM00C buffer zone were observed well maintained. Water quality test for Sampel Air Ladang Tenggaroh 09 (Sungai Ambat) on 16 May 2019 for parameter such as pH @ Temperature: 6.9 @ 25.0 °C, BOD: 2 mg/l, COD: 15 mg/l, Total Suspended Solids : 14 mg/l, Ammoniacal Nitrogen : 02 mg/l and Dissolved Oxygen : 8.42 mg/l.</p>	



Sighted the management program for rehabilitation in FGV T9, T11, and T13 for the buffer zone to be in line with RSPO guideline that include long term program such as :

- i) Activity involved
- ii) Action / awareness [mapping of riparian zone ]
- iii) Marking of riparian zone area
- iv) Monitoring of riparian zone
- v) Rehabilitation of riparian zone
- vi) Management plan of riparian zone

Sighted the plan had been conducted into 4 quarter which include responsible person, recording , briefing on buffer zone management following SOP such as no chemical and fertilizer application in buffer zone area, and management of riparian zone towards the workers. Sighted the program will be conducted such as the awareness with department of environmental and water river and drainage department of Malaysia.

**7.8.3**

Based on the result , sighted the mill result For effluent discharge (Bio Flow out) latest monitoring result on 01/10/2019 for pH at 250c 8.1, BOD 35, COD 370, Total Solid 1610, Suspended Solids 78, Oil & Grease 2, Ammoniacal Nitrogen 22, and Total Nitrogen 71. For effluent discharge an approval to extend compliance limit for discharge from 1 July 2019 to 31 December 2019 (ref AS (B) J 31/152/000/038 Jilid 7(02) dated 4 September 2019. And for Clean Air Regulation 2014 approval from DOE has been obtain (License number 005360 date of extension 5 June 2019 to 5 June 2020 JPLP/PUB/19/005360).

**Status: Comply**

**7.9**

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

The fuel efficiency had been recorded including the diesel usage for the mill and fibre. Fossil fuel and renewable energy been recorded on Month November 2019 which include :

- i) FFB Process
- ii) Generator
- iii) Wheel loader
- iv) Skid steer loader
- v) Tractor
- vi) Total MT
- vii) Water pump
- viii) Others
- ix) Total RM / MT

Total used details on month November 2019 = 1845, month October 2019 = 1850, September 2019 = 6320 liters. Based on the field observation and interview, it was confirmed that the mill using Continuous Sterilizer method which the fuel need to be collected before mill start operation.

Sighted the result of POME Monitoring for month 17<sup>th</sup> December 2019 which include the parameter for Bio Flow in :

- i) Ph 25 = 7.5
- ii) BOD 3 days – 30 C = 81
- iii) COD = 546
- iv) Total Solid = 1628
- v) Suspended Solid = 208
- vi) Oil and Grease = -
- vii) Ammoniac Nitrogen = 47
- viii) Total Nitrogen = 72

Samples on Bio Flow Out

- i) PH = 25C
- ii) BOD = 26
- iii) COD =151
- iv) TS = 780

- v) Suspended Solids = 57
- vi) Oil and Grease = 2
- vii) Ammoniac Nitrogen = ND < 5
- viii) Total Nitrogen = 8

Sighted the mill water usage per Ton FFB been recorded by the management which include daily record of water usage and rate usage of water :

- 1) December 2019 → day 1<sup>st</sup> 3.41, 15<sup>th</sup> 2.47, 31<sup>st</sup> 1.89 = average 2.59
- 2) Summary of water usage in the mill (MT / BTS 2019)→

Month	MT / BTS
January	1.32
February	1.33
March	1.4
April	1.39
May	1.45
June	1.38
July	1.56
August	1.38
September	1.38
October	1.52
November	1.5
December	1.89

**Status: Comply**

**7.10**

**Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.**

**7.10.1 , 7.10.2**

The Palm GHG version 4 had been developed for Tenggaroh Complex and the reporting to RSPO had been done on 13<sup>TH</sup> JANUARY 2020 as per email notification from RSPO. The Palm GHG result as follows :

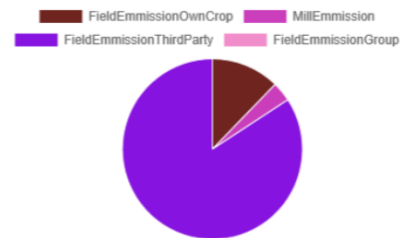
- i) KS Tenggaroh

**FGV KS Tenggaroh - 2019 Summary**

Summary Emission

Product	tCOe2 / tProduct	Action
CPO	0.80	
PK	0.80	
PKO	0.00	
PKE	0.00	

Description	Unit	Value	Action
Oil palm planted on mineral soil	Ha	5293.51	
Oil palm planted area on peat	Ha	0.00	
Total oil palm planted area	Ha	5293.51	
Conservation area (Forested)	Ha	136.00	
Conservation area (Non-Forested)	Ha	0.00	
FFB Production per hectare	t/ha	11.69	
OER	%	23.27	
KER	%	5.55	



← FGVPM TENGGAROH 9 ( 2019 Summary )

[FFB](#)  
 [3rd Party Suppliers](#)  
 [Planting Data](#)  
 [Fertiliser](#)  
 [Field Fuel](#)  
 [Peat](#)  
 [Crop Sequestration](#)  
[Conservation](#)  
 [Summary](#)

Summary

 Calculation Sheet

Description	Unit	Value
Oil palm planted on mineral soil	Ha	2693.80
Oil palm planted on peat	Ha	0.00
Total oil palm planted area	Ha	2693.80
Conservation area (Forested)	Ha	91.00
Conservation area (Non-forested)	Ha	0.00
FFB supplied to this mill	t	29068.65
FFB produced by this estate/pantation	t	29068.65
FFB production per hectare	t/ha	10.79

Description	Total emission (tCO2e)	tCO2e/ha	tCO2e/t FFB	Emission allocated to this mill (tCO2e)
Land Conversion	26605.66	9.88	0.92	26605.66
Crop Sequestration	-25218.64	-9.36	-0.87	-25218.64
*CO2 Emissions from Fertiliser	1795.52	0.67	0.06	1795.52
N2O Emissions from Peat	0.00	0.00	0.00	0.00
N2O Emissions from Fertiliser	1376.18	0.51	0.05	1376.18
Fuel Consumption	134.18	0.05	0.00	134.18
Peat Oxidation	0.00	0.00	0.00	0.00
Sequestration in Conservation area	-834.47	-0.31	-0.03	-834.47
<b>TOTAL</b>	<b>3858.43</b>	<b>1.43</b>	<b>0.13</b>	<b>3858.43</b>

\*Includes transport and manufacture emissions from mineral fertilizers and emissions from urea

← FGVPM TENGGAROH 11 ( 2019 Summary )

[FFB](#) [3rd Party Suppliers](#) [Planting Data](#) [Fertiliser](#) [Field Fuel](#) [Peat](#) [Crop Sequestration](#)

[Conservation](#) [Summary](#)

Summary

 Calculation Sheet

Description	Unit	Value
Oil palm planted on mineral soil	Ha	1460.51
Oil palm planted on peat	Ha	0.00
Total oil palm planted area	Ha	1460.51
Conservation area (Forested)	Ha	45.00
Conservation area (Non-forested)	Ha	0.00
FFB supplied to this mill	t	24429.23
FFB produced by this estate/pantation	t	24429.23
FFB production per hectarage	t/ha	16.73

Description	Total emission (tCO <sub>2</sub> e)	tCO <sub>2</sub> e/ha	tCO <sub>2</sub> e/t FFB	Emission allocated to this mill (tCO <sub>2</sub> e)
Land Conversion	14424.91	9.88	0.59	14424.91
Crop Sequestration	-13672.91	-9.36	-0.56	-13672.91
*CO <sub>2</sub> Emissions from Fertiliser	734.56	0.50	0.03	734.56
N <sub>2</sub> O Emissions from Peat	0.00	0.00	0.00	0.00
N <sub>2</sub> O Emissions from Fertiliser	627.37	0.43	0.03	627.37
Fuel Consumption	107.28	0.07	0.00	107.28
Peat Oxidation	0.00	0.00	0.00	0.00
Sequestration in Conservation area	-412.65	-0.28	-0.02	-412.65
<b>TOTAL</b>	<b>1808.56</b>	<b>1.24</b>	<b>0.07</b>	<b>1808.56</b>

\*Includes transport and manufacture emissions from mineral fertilizers and emissions from urea

← FGVP M TENGGA ROH 13 ( 2019 Summary )

FFB 3rd Party Suppliers Planting Data Fertiliser Field Fuel Pest Crop Sequestration

Conservation Summary

Summary Calculation Sheet

Description	Unit	Value
Oil palm planted on mineral soil	Ha	1139.20
Oil palm planted on peat	Ha	0.00
Total oil palm planted area	Ha	1139.20
Conservation area (Forested)	Ha	0.00
Conservation area (Non-forested)	Ha	0.00
FFB supplied to this mill	t	16803.75
FFB produced by this estate/pantation	t	16803.75
FFB production per hecтарage	t/ha	14.75

Description	Total emission (tCO <sub>2</sub> e)	tCO <sub>2</sub> e/ha	tCO <sub>2</sub> e/t FFB	Emission allocated to this mill (tCO <sub>2</sub> e)
Land Conversion	11251.46	9.88	0.67	11251.46
Crop Sequestration	-10664.89	-9.36	-0.63	-10664.89
*CO <sub>2</sub> Emissions from Fertiliser	648.09	0.57	0.04	648.09
N <sub>2</sub> O Emissions from Peat	0.00	0.00	0.00	0.00
N <sub>2</sub> O Emissions from Fertiliser	590.73	0.52	0.04	590.73
Fuel Consumption	55.35	0.05	0.00	55.35
Peat Oxidation	0.00	0.00	0.00	0.00
Sequestration in Conservation area	0.00	0.00	0.00	0.00
<b>TOTAL</b>	<b>1880.74</b>	<b>1.65</b>	<b>0.11</b>	<b>1880.74</b>

\*Includes transport and manufacture emissions from mineral fertilizers and emissions from urea

**7.10.3**

Significant pollutant had been recorded inside the waste action and management plan .The record of pollutant had been listed in Environment Aspect Impact. Sighted the record of aspect impact that being on 1<sup>st</sup> October 2019, action plan to reduce the environmental impact from estate activities :

- i) Giving training related to the management of spent chemical to the and tractor and person in charge.
- ii) Provide the temporary storage for the spent pesticide container after triple rinsed.
- iii) Collected the record on spent container and being kept at the storage area.
- iv) Spent container collected and send to the contractor.
- v) Monitoring of the premix area and SOP of mixing inside the office.

**Status: Comply**

**7.11  
Fire is not used for preparing land and is prevented in the managed area.**

**7.11.1, 7.11.2, 7.11.3**  
Sighted on Group Sustainability Policy (FGV/SED/POL/001, Revision : 3) on 5.3 Environmental Stewardship – 5.3.6 No Open Burning/Use of fire, FGV Group practices no open burning policy in all its premise, developed and maintain fire prevention and emergency preparedness programmes to deal with fires that may approach within or in the vicinity of its boundaries and actively monitor and report all fire incidents occurring within as well as its surrounding areas to the relevant authorities to comply with Environment Quality Act 1974. Sighted also sample of replanting contracts in the estate Tenggaroh 09 which stated the works as follows:

- Pre lining double row ,
- Mechanical cutting, chopping and grinding [non-fire]
- Build agricultural roadside
- Main street 5.5 m wide
- To build a road
- Line the terrace path
- Build agricultural trenches
- Build a palm terrace
- Build a swamp road

The Emergency response plan had been established in Tenggaroh 11 and 13 which clearly stated in case of spillage or fire, what to do method and response related to emergency. sighted the details of ERP as follows :

Store or household office estate emergency plan → in case of fire→ contact hospital authorities and unit heads [make sure there are no fatalities]Can be controlled or not:

i) Can □ extinguish the fire → make sure the fire extinguishers and the worker is safe → notify the employer →remove everyone nearby → make sure everyone goes to the gathering place →count the number of people → to investigate to avoid any tragedy.

Sighted the planning for year 2020 to engage the stakeholders [join training with stakeholders] which will be conducted on June 2020 by FGV Tenggaroh 11 and 13. Based on the FGV training for year 2020 sighted the list of company sustainability policy which stated in “replanting program yearly for all the workers and contractors 2020”

Consideration to improve involvement of the local adjacent stakeholders related to fire prevention and control measures (OFI).

	<b>Status: OFI.</b>	
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**7.12  
Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.**

**7.12.1, 7.12.4, 7.12.5, 7.12.7, 7.12.8**  
There is no new planting recorded inside the estate prior 15<sup>th</sup> November 2018. Sighted based on document and field verification at FGV Estate Tenggaroh 09.11 and 13 as there are only replanting in the estates.

**7.12.2, 7.12.3, 7.12.6**  
Sighted plan to send the personnel for ALS – HCV as per requirement of RSPO for The FGV Personnel including the budget allocated of Rm 10,000.00 for the internal assessor from SCC department of FGV.  
OFI - To follow up on existing plantations with an HCV assessment conducted by an RSPO-approved assessor  
The Biodiversity report been made by Mr Zulfadzli from PSD department dated 20<sup>th</sup> December 2017 for the HCV assessment.  
Sighted the hotspot available based on the biodiversity report :



- Steep area that is not planted.
- Prone to flood area that would damage the palm oil.
- Non economical palm oil area.
- Buffer zone area along Sungai Ambat and Sungai Pasir Panjang

Sighted the record of monitoring wildlife in sensitive area which include details on recording such as:

- Date and time
- Area block
- Type of wildlife /sensitive aspect that being identified
- Traces of evidence
- Notes and type of wildlife found

The monitoring will be done on 3 monthly basis around the estate , name , location., type of RTE , traces of footsteps, comments, sensitive area like buffer zone, riparian river, swampy area, water retention pond, that being approved by the estate manager.

To follow up on existing FGV estates with an HCV assessment conducted by an RSPO-approved assessor **(OFI)**.

	<b>Status: OFI.</b>	
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**3.0 Conformity Checklist of Certificate and Trademark Use**

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

**3.1 Summary of RSPO Partial Certification.**

Compliance of the uncertified management units of RSPO Member 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.

Compliance of the uncertified management units of FGV Holdings Berhad 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.

Felda Global Ventures Holdings Berhad Time Bound Plan is explaining in table 1.10. Felda Global Ventures Holdings Berhad run seventy one (71) mills and Seventy Five (75) Complex in Malaysia and Indonesia and no one has achieved RSPO certified. FGV Berhad has informed the Time Bound Plan progress, MUTU has considered that Felda Global Ventures Holdings Berhad is comply with the RSPO requirement for Time Bound Plan. The Time Bound Plan was revised and declared by Felda Global Ventures Holdings Berhad on November 2019.

MUTU has verified partial certification for un-certified unit's subsidiary of Felda Global Ventures Holdings Berhad based on their Time Bound Plan. There are seventy one (71) uncertified management unit of Felda Global Ventures Holdings Berhad. 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.

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.2.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p><i>Company Group/Holding Statement:</i> Yes, there was an internal audit and has positive assurance statement.</p> <p><i>Auditor Verification:</i> Yes, at the current status only 16 complexes already have internal audit in year 2016. Seen the internal audit done by Certification &amp; Due Diligence (CDD) Department. The NC during the audit still in progress to close. All certification bodies that will do the audit for FGV need to verify those NC. Others complex will do as per their time bound plan. Overall findings is positive as per before.</p>
2.2.2	No replacement of primary forest or any area identified as containing High Conservation Values (HCVs) or required to maintain or enhance HCVs in accordance with RSPO	<p><i>Company Group/Holding Statement:</i></p> <p><i>Auditor Verification:</i></p>

	<p>criterion 7.3 (it has changed be Criterion 7.12 in P&amp;C 2018)</p>	<p>As per this year audit, there has been no replacement of primary forest area. However, there is one issue reported by Chain Research Reaction regarding HCV clearance in Kalimantan.</p> <p>FGV already brief this issue to RSPO secretariat. All details summary as per below:</p> <table border="1" data-bbox="857 499 1393 1890"> <thead> <tr> <th colspan="3">HCV clearance Kalimantan reported by Chain Research Reaction</th> </tr> <tr> <th>ISSUE</th> <th>ACTION PLAN PROGRESS</th> <th>DATE OF COMPLETION</th> </tr> </thead> <tbody> <tr> <td>HCV clearance at PT CNP and PT TAA</td> <td>Engaged independent consultant for ground investigation</td> <td>20 April - 4<sup>th</sup> May 2016</td> </tr> <tr> <td></td> <td>Investigation finding presentation to FGV management</td> <td>9<sup>th</sup> May 2016</td> </tr> <tr> <td></td> <td>Brief presentation to RSPO on the investigation findings</td> <td>10 May 2016</td> </tr> <tr> <td></td> <td>Letter to stop all operation in HCV area</td> <td>10 May 2016</td> </tr> <tr> <td></td> <td>1st Public statement on HCV clearance at PT CNP and PT TAA on FGV website</td> <td>22<sup>nd</sup> May</td> </tr> <tr> <td></td> <td>Discussion on Conservation and remediation plan with RSPO technical Director</td> <td>23 May 2016</td> </tr> <tr> <td></td> <td>2nd Public statement on HCV clearance at PT CNP and PT TAA on FGV website</td> <td>25 May 2016</td> </tr> <tr> <td></td> <td>Sent a letter to RSPO on action plan for PT CNP and PT TAA</td> <td>27<sup>th</sup> May 2016</td> </tr> <tr> <td></td> <td>3rd Public statement on HCV clearance at PT CNP and PT TAA on FGV website</td> <td>15 June 2016</td> </tr> </tbody> </table>	HCV clearance Kalimantan reported by Chain Research Reaction			ISSUE	ACTION PLAN PROGRESS	DATE OF COMPLETION	HCV clearance at PT CNP and PT TAA	Engaged independent consultant for ground investigation	20 April - 4 <sup>th</sup> May 2016		Investigation finding presentation to FGV management	9 <sup>th</sup> May 2016		Brief presentation to RSPO on the investigation findings	10 May 2016		Letter to stop all operation in HCV area	10 May 2016		1st Public statement on HCV clearance at PT CNP and PT TAA on FGV website	22 <sup>nd</sup> May		Discussion on Conservation and remediation plan with RSPO technical Director	23 May 2016		2nd Public statement on HCV clearance at PT CNP and PT TAA on FGV website	25 May 2016		Sent a letter to RSPO on action plan for PT CNP and PT TAA	27 <sup>th</sup> May 2016		3rd Public statement on HCV clearance at PT CNP and PT TAA on FGV website	15 June 2016
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		Develop the Conservation and Remediation plan and relevant SOP	1 <sup>st</sup> July 2016
		Appointment letter to engage independent external social mediator to handle negotiation with affected communities	1 <sup>st</sup> July 2016
		Conducted social mediation and engagement with affected communities	18 July to 30 July 2016
		Consultation with FGV legal department on local national regulation. Found that the area (PT CNP and PT TAA) were outside the Indonesia Peat Moratorium no. X (10)	30 July 2016
		4th Public statement on HCV clearance at PT CNP and PT TAA on FGV website	12 August 2016
		Sent the progress of action taken to RSPO using SRT V	19 August 2016
		Sent out the Conservation and remediation plan to PT CNP and PT TAA for implementation	7 Oct 2016
		Meeting with RSPO Technical Director and RSPO Complaint Coordinator on PT CNP and PT TAA issue	14 Oct 2016
		Sent the progress of action taken to RSPO using SRT V	17 Oct 2016
		5th	5 Nov 2016

			Public Statement on HCV clearance at PT CNP and PT TAA on FGV website	
			Meeting with RSPO secretariat on Compensation Panel feedback and our complaints on HCV updates in WSJ complaint update	25 Nov 2016
			Received comment and recommendation from RSPO compensation Panel on PT CNP	1 Dec 2016
			Meeting with the FGV Kalimantan at PT CNP office for further engagement with ELC/Aidenvironment and Aksenta	13 Dec 2016
			Meeting on new revised Indonesia regulation PP57 and PP 71 with Badan Lingkungan Hidup dan Kehutanan as well as with Dinas Perkebunan Kalimantan Barat	14 Dec 2016
			Meeting with ELC/AIDH and Aksenta on new proposal to include Aidenvironment proposal for our Landscape conservation plan	14 Dec 2016
			Meeting with PERMADA (Persatuan Madura & Dayaks) on their request to develop the HCV area	15 Dec 2016



			Site visit to PT CNP and PT TAA with Kalimantan team	15 Dec 2016																														
			Finalizing the next action for conservation engagement with ELC/AIDH and Aidenvironment	16 Dec 2016																														
			Kalimantan operation to seek an area with local Bupati to replace the cleared HCV area	In progress																														
		REVIEW HCV ASSESSMENT	6th Public Statement on HCV clearance at PT CNP and PT TAA on FGV website	10 Feb 2017																														
			PERSADA meeting with RSPO Jakarta	9th Mar 2017																														
2.2.3	Any new plantings since January 1 <sup>st</sup> 2010 must comply with the RSPO New Plantings Procedure.	<p><i>Company Group/Holding Statement:</i> There is new planting after 1 Jan 2010.</p> <p><i>Auditor Verification:</i> NPP audit has been carried out for all FGVPM Estate and is currently under review. Data as per below</p> <table border="1"> <thead> <tr> <th>ESTATE</th> <th>HECTARAGE INVOLVES IN NPP</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>FGVPM Chegar Perah 1</td> <td>59.32</td> <td rowspan="4">Still on going. Waiting consultant (Aksenta) to present the final report for HCV, SIA, LUCA &amp; HCS sssessment.</td> </tr> <tr> <td>FGVPM Bukit Sagu 8</td> <td>61.54</td> </tr> <tr> <td>FGVPM Tembangau 5</td> <td>86.58</td> </tr> <tr> <td>FGVPM Selendang 3</td> <td>97.59</td> </tr> <tr> <td>FGVPM Krau 2</td> <td>170.78</td> <td rowspan="7">Waiting consultant (Aksenta) to start NPP assessment in February 2017.</td> </tr> <tr> <td>FGVPM Krau 4</td> <td>80.28</td> </tr> <tr> <td>FGVPM Bukit Sagu 6</td> <td>72.87</td> </tr> <tr> <td>FGVPM Lepar Hilir 5</td> <td>253.62</td> </tr> <tr> <td>FGVPM Tembangau 6</td> <td>495.53</td> </tr> <tr> <td>FGVPM Aring 10</td> <td>518.52</td> </tr> <tr> <td>FGVPM Setiu 01</td> <td>130.72</td> </tr> <tr> <td>Total</td> <td>1,722.32</td> <td></td> </tr> </tbody> </table>			ESTATE	HECTARAGE INVOLVES IN NPP	Status	FGVPM Chegar Perah 1	59.32	Still on going. Waiting consultant (Aksenta) to present the final report for HCV, SIA, LUCA & HCS sssessment.	FGVPM Bukit Sagu 8	61.54	FGVPM Tembangau 5	86.58	FGVPM Selendang 3	97.59	FGVPM Krau 2	170.78	Waiting consultant (Aksenta) to start NPP assessment in February 2017.	FGVPM Krau 4	80.28	FGVPM Bukit Sagu 6	72.87	FGVPM Lepar Hilir 5	253.62	FGVPM Tembangau 6	495.53	FGVPM Aring 10	518.52	FGVPM Setiu 01	130.72	Total	1,722.32	
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<p>2.2.4</p>	<p>Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO criteria 2.2, 6.4, 7.5 and 7.6 (it has changed be Criterion 4.8, 4.7 and 4.5 in P&amp;C 2018).</p>	<p><i>Company Group/Holding Statement:</i></p> <p><i>Auditor Verification:</i></p> <p>There is issue on land conflict although it was captured on Felda Membership, but FGV also indirectly involved as part of the claim involve FGVP Sahabat 55 The issue still in progress. Data as per below:</p> <p>Member : Lembaga Kemajuan Tanah Persekutuan (FELDA) /Orang Dusun Desa Begahak  Date Filed : 16 February 2015  Complaint : Community of Desa Begahak  Complaint : The company has breached the communities user rights to the land in breach of Principle 2.2</p> <p>Status : Box F – Action Plan</p> <p>Synopsis</p> <p>According to the Enquiry National Hak Tanah of Malaysia conducted by SUHAKAM, the state government had given 1260 acres of land to the Dusun Begahak community in 1981. At the same time, the same land was alienated to FELDA for development.</p> <p>The complainant raised the issue that FELDA has no right to develop their land and should return it to the community because the land originally belonged to the community. The complainant also stated that the cemetery area is being developed by FELDA.</p> <p>FELDA enclaved 916 acres of the said land and gave it back to the community on the 25th of May 1982. The community planted fruits and other crops on the land.</p> <p>We have received some evidence from both sides. The evidence needs to be scrutinised and investigated further.</p> <p>Remarks</p> <p>2 July 2015 – It was agreed that the matter would be referred to the FELDA/FGV Sustainable Steering Committee on 7th July 2015.</p> <p>22 June 2015 – FELDA had another meeting with Robin Balud and the representatives of the community and agreed to exchange documents on the land claim. A</p>
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	<p>site visit was also undertaken with the community members.</p> <p>4 June 2015 – FELDA met with Robin Balud again and agreed to do a joint mapping of the land.</p> <p>10 April 2015 – FELDA met the complainant, Robin Balud, in Kota Kinabalu Sabah, to discuss the complaint.</p> <p>9 April 2015 – FELDA met the community (Desa Begahak) members and discussed the issues from the complaint and the land claim.</p> <p>13 March 2015 – RSPO had a conference call meeting with the head of the Dusun Begahak community to understand the situation.</p> <p>16 March 2015 – RSPO had a conference call meeting with FELDA representatives to discuss the situation.</p> <p>17 March 2015 – The complaint was raised to the Complaint Panel for further discussion and action.</p> <p>4 June 2015 – FELDA met the complainant Robin Balud and discussed the main issues of the land claim and compensation.</p> <p>22 March 2016 – RSPO sent complaint notice to FELDA.</p> <p>1 April 2016 – State Land and Survey Department begin its mapping exercise.</p> <p>4 April 2016 – FELDA submits action plan to RSPO dated 27 March 2016.</p> <p>6 May 2016 – FELDA withdraws its RSPO Principle and Criterias certificates.</p> <p>26 July 2016 – Complainant send a formal letter to FELDA to settle the customary land dispute.</p> <p>19 August 2016 – Progress report submitted by Felda.</p> <p>20 September 2016 – Felda met with the community to discuss on how they will progress on the complaint,</p>
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		once the joint mapping report is received from the Sabah Land and Survey department
2.2.5	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3 (it has changed be Criterion 4.2 in P&C 2018).	<p><i>Company Group/Holding Statement:</i></p> <p><i>Auditor Verification:</i> There is 1 issue happen in FGVPM Palong Timur 04 (Now FGVPM Palong Timur 05) and the details is elaborated below:</p> <p>1. FGVPM PALONG TIMUR 04 (NOW FGVPM PALONG TIMUR 05): Claims on 19.06.2012 with value of summon RM61,968.60 and summon status is Court Appeal</p>
2.2.6	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1 (it has changed be Criterion 4.2 in P&C 2018).	<p><i>Company Group/Holding Statement:</i></p> <p><i>Auditor Verification:</i> During partial audit, 1 issue with DOE in FPISB Selancar 2A POM is sighted. Summon no: SJ 53-4/2016; Date 14.04.2016 in Mahkamah Seksyen Kuantan.</p> <p>Fixed for Trial on 01.03.2017, 02.03.2017 and 03.03.2017.</p> <p>Also 1 issue for minimum wages. Refer to 4.3.1</p> <p>All process still in progress and CB will verify this issue in next audit or during audit in this mill.</p>

**3.2 Identification of Findings, Corrective Action, Observations, Opportunity for Improvement and Noteworthy Positive Components.**

**3.4.1. Identification of Findings, Corrective Actions and Observations at ASA-1.**

<b>NCR No.</b>	: 2020.01	<b>Issued by</b>	: Ebnun Holdoon
<b>Date Issued</b>	: January 17 <sup>th</sup> , 2020	<b>Time Limit</b>	: ASA 2
<b>NC Grade</b>	: Non-Critical	<b>Date of Closing</b>	:
<b>Standard Ref. &amp; Requirement</b>	: 2.2.2 All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.		
<b>Non-Conformance Description and Evidence observed (filled by auditor)</b>			
<p>During the audit at KS Tenggaroh, it was verified that the contracts related to FFB Suppliers for FGV Tenggaroh Mill is not sighted. Hence the auditor unable to verify the specific clauses related to the legal requirements that should be stated inside the contract.</p> <p>Mill Management unable to show the contract documents for the FFB Suppliers.</p>			
<b>Root Cause Analysis (filled by organization audited):</b>			
<b>Corrective Action (filled by organization audited):</b>			
<b>Preventive Action (filled by organization audited):</b>			
<b>Assessor Evaluation and Conclusion (filled by auditor):</b>			
<b>Verified by</b>	:		

<b>NCR No.</b>	: 2020.02	<b>Issued by</b>	: Sandra P
<b>Date Issued</b>	: 17 January 2020	<b>Time Limit</b>	: 16 April 2020
<b>NC Grade</b>	: Critical	<b>Date of Closing</b>	: 5 March 2020
<b>Standard Ref. &amp; Requirement</b>	: 3.8.7 Purchasing and Goods in i. The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. ii. The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage. iii. The mill shall have a mechanism in place for handling non-conforming oil palm products and/or documents		
<b>Non-Conformance Description &amp; Evidence observed (filled by auditor)::</b>			
Based on production report of FFB, CPO and PK Jan-Dec 2019, there is an over-production of CSPO and CSPK compared to the projection tonnage stated in the certificate as per table below:			

Item	Production estimated for 12 months (Tons)	Actual production (Jan – Dec 2019)
FFB	65,456	65,442.72 MT
CPO	13,909	15,543.60 MT
PK	3,436	3,831.52 MT

Based on the table above, the mill unable to show the evidences of overproduction certified tonnage has been informed to the CB immediately (indicator clause no ii) .

**Root Cause Analysis** (filled by organization audited):  
No supervision by management on overproduction which not communicate with CB due to changes of person in charge

**Corrective Action** (filled by organization audited):  
Evidence on communication with CB on overproduction of certified tonnage

**Preventive Action** (filled by organization audited):  
Regular monitoring through internal audit Supply Chain every year by Sustainability team.

**Assessor Evaluation and Conclusion** (filled by auditor):  
**Auditor verification on 5 March 2020,**  
The CH has submit the evidence of correction in the form of capture of email to CB on 24 Feb 2020 in regard of over production of CSPO and CSPK, and as well as extension volume request.

The CH has prepare the SOP for implementation and monitoring the RSPO SCC on POM (doc no. RSPO SCC on 21 Jan 2020), the monitoring of production and stock on palmtrace shall be conducted once a year during internal audit.

Based on the above evidence, the NCR stated fulfilled.

**Verified by** : **Sandra Purba**

<b>NCR No.</b>	: 2020.03	<b>Issued by</b>	: Sandra P
<b>Date Issued</b>	: January 17 <sup>th</sup> , 2020	<b>Time Limit</b>	: 16 April 2020
<b>NC Grade</b>	: Critical	<b>Date of Closing</b>	: 5 March 2020
<b>Standard Ref. &amp; Requirement</b>	3.8.16 <b>Registration of Transactions</b> i. Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date. ii. Remove: RSPO certified volumes sold under a different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.		
<b>Non-Conformance Description &amp; Evidence observed</b> (filled by auditor):	3. Based on mass balance record keeping since 26 December 2018 until 31 December 2019, it is verified that the CSPO delivery / sales conducted within Sept 2019 up to Dec 2019. Based on verification of sales transaction under Tenggaroh POM in RSPO IT Platform, it is known that the shipping announcement has been done for the transaction between Jan 2019-Aug 2019. <b>However the mill cannot show the evidence that shipping announcement for certified products sold has been</b>		



<p>carried out by the mills for the delivery/sales in Sept – Dec 2019.</p> <p>4. Based on mass balance record keeping since 26 December 2018-31 December 2019, there is an RSPO certified volumes sold under conventional, CSPO amount of 17,512.49 MT and CSPK amount of 489.86 MT.</p> <p>However, the mill cannot shown the evidence of volumes has been <b>removed in the RSPO IT platform</b>.</p>	
<p><b>Root Cause Analysis</b> (filled by organization audited):</p> <p>Shipping announcement were done by centralized department (logistic) and will be announced once the mill fulfills each contract and said amount were confirmed by receiver. Hence, announcement for period of Sept –Dec 2019 yet to be done. Both announcement and stock removal were done by logistic department</p>	
<p><b>Corrective Action</b> (filled by organization audited):</p> <p>Logistic department announced amount that yet to be announced and do the stock removal.</p>	
<p><b>Preventive Action</b> (filled by organization audited):</p> <p>SOP on RSPO SCCS enhanced from version 3.5 to 3.6 on announcement and stock removal.</p>	
<p><b>Assessor Evaluation and Conclusion</b> (filled by auditor):</p> <p><b>Auditor verification on 5 March 2020,</b></p> <p>The CH has submit the evidence of correction such as:</p> <ul style="list-style-type: none"> <li>- Evidence of shipping announcement of CSPO and CSPK carry out by Tenggaroh POM for example: transaction id: TR-0bc77431-c2f9 buyer: Kilang Isi Sawit Pasir Gudang, product CSPK, volume 325.1 MT (confirmed) on 29 Nov 2019 transaction id: TR-3bd83abf-be61, buyer: Vance Bioenergy sdn Bhd, product CSPO, 475.76 MT (confirmed) on 14 Aug 2019</li> <li>- SOP for mill RSPO SCC, document no. RSPO SCC on 21 Jan 2020, stated in the SOP that the POM will announce all shipping upon the contract completed, monitoring will be conducted through internal audit.</li> <li>- The removing evidence of sustainable product sold under conventional on RSPO Palmtrace as much as 2586.28 MT of CSPK and 3020.7 MT of CSPO</li> </ul> <p>Based on the above evidence, the NCR stated fulfilled.</p>	
<b>Verified by</b>	: <b>Sandra Purba</b>

<b>NCR No.</b>	: <b>2020.04</b>	<b>Issued by</b>	: <b>Ebnu Holdoon</b>
<b>Date Issued</b>	: <b>January 17<sup>th</sup>, 2020</b>	<b>Time Limit</b>	: <b>16 April 2020</b>
<b>NC Grade</b>	: <b>Critical</b>	<b>Date of Closing</b>	: <b>28 Feb 2020</b>
<b>Standard Ref. &amp; Requirement</b>	<p><b>6.7.3</b></p> <p><b>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</b></p>		
<p><b>Non-Conformance Description &amp; Evidence observed</b> (filled by auditor) :</p> <p>During the field observation at FGV Tenggaroh 9, it was observed that 5 workers are not wearing the safety boots provided by the estate management. Based on the interview, it is known that the workers are “self-purchased” the shoes by themselves. In the company’ SOP stated that the PPE are PPE are provided to workers in free of charge. Based on interview with management representative stated that the PPE are provided to all workers as per scheduled. Based on the interview and stock verification at Tenggaroh 11, it was found that there are lapses in safety shoes return and receive system.</p>			

Refer to explanation above, the workers are not using the appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work.

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

The workers do not understand the procedure for returning PPE stated in the Occupational Safety & Health Guidelines - Management of Personal Protective Equipment (PPE) besides there was insufficient stock of PPE for replacement.

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

1. Conduct PPE training with explanation of PPE replacement procedures to the workers
2. Updating PPE hand-over records to affected employees
3. Ensure that PPE Stocks are always in stock

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

HEP / Supervisor / Store Clerk monitors compliance of PPE usage among the workers periodically.

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

The Unit of certification had send few evidences for Tenggaroh 9 and Tenggaroh 13 as followings :

- i) Evidence of the workers on PPE usage in the field works
- ii) Counter checklist of using supplied PPE for FGV Tenggaroh 09 which include the details of workers name, type of PPE used and the type of work.
- iii) Record of using PPE for the workers including type of PPE used and size
- iv) Invoices of ordering new PPE stock for the store that include other workers equipment also.
- v) Training related to mechanism of exchange PPE for the workers and the attendance list of workers (dated 20<sup>th</sup> January 2020 at Rollcall Area dan 29<sup>th</sup> January 2020 at Tenggaroh 13)
- vi) Individual Records of PPE Issuance that include the dates, type of PPE issued, name of recipient and the signature of recipient.
- vii) Questionnaire on understanding regarding the stocks and PPE usage for the workers conducted by the assistant managers
- viii) Immediate ready stocks available in the PPE store for the workers if there are any exchange of damage PPE

**Based on the evidence shown by the unit of certification and the correction updated, hence it the auditor satisfied with the correction and concluded the NCR Critical 2020.04 is considered CLOSED.**

**Verified by** : EBNU HOLDOON SHAWAL

<b>NCR No.</b>	: 2020.05	<b>Issued by</b>	: Ebnu Holdoon
<b>Date Issued</b>	: January 17 <sup>th</sup> , 2020	<b>Time Limit</b>	: ASA 2
<b>NC Grade</b>	: Non-Critical	<b>Date of Closing</b>	:
<b>Standard Ref. &amp; Requirement</b>	: 7.3.3 The unit of certification does not use open fire for waste disposal.		

**Non-Conformance Description & Evidence observed** (filled by auditor):  
 During the field visit at FGV Tenggaroh 9 housing complex, it was observed 3 traces of burning rubbish located at the backyard of Hostel area. Hence, the evidence observed are against the indicator 7.3.3 (does not use open fire for waste disposal).



\*at the backyard of Hostel area (Tenggaroh 9 Estate)

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

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

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

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

**Verified by** :

**3.4.2. Opportunity for Improvement**

No.	Reff standard	Description
1	2.1.1 (C)	The company to consider follow up the progress of obtaining work permit for foreign workers to JTKA (Tenggaroh 13 Estate).
2	2.1.3	Progress of re-installation of boundary stone in all estates as per planning. (FGV Tenggaroh 9, 11,13).
3	6.2.4 (C)	The company considered to improve the hygienic sanitation facilities in housing area especially in Tenggaroh 9 Estate.
4	7.2.6 (C)	Monitoring and implementation of estate manager Tenggaroh 11 instruction letter on “arahan larangan membawa dan membancuh racun Ally di ladang”.
5	7.3.1	Opportunity for the unit of certification (Tenggaroh 11) to improve the garage area as per budget allocation
6	7.11.3	Consideration to improve involvement of the local adjacent stakeholders related to fire prevention and control measures at FGV Tenggaroh 9,11 and 13.
7	7.12.2 (C)	To follow up on existing FGV estates (Tenggaroh 9,11,13) with an HCV assessment conducted by an RSPO-approved assessor.

**3.4.3. Noteworthy Positive Components**







No	Description
1.	Company has commitment to implement the principle of sustainable palm oil management.
2.	Good filing system maintained at Tenggaroh 13 and Mill.

**3.3 Summary of Arising Issues from Public and Auditor Verification.**

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p><b>Contractors of FFB Transport For FGV Tenggaroh 9 and 11 [Che Halim]</b></p> <p>2 local contractors [FFB Supplier] had been interviewed during the audit. Based on the interview, the payment method, contracting and workers welfare had been a priority concern of FGV Plantations Malaysia. The contract been made in the HQ FGV [Wisma FGV] in Kuala Lumpur and the contracting been made through “Procurehere” system since year 2019. The method of payment will be done by Cheque and payment been made on monthly basis based on the contract and invoice issuance. Sighted no complain has been logged in towards the FGV management and the contractor are satisfied with FGV Management in handling the contract. The contract is on yearly basis and conducted in FGV-HQ in Kuala Lumpur. FGV management also giving information to the Contractor during signing the contract that they should obey the latest company policies [GSP 3.0], safety policy, the anti-bribery policy and the local contractor had also been continuously brief by Estate manage. The Contractors also kept the contract agreement copy with them. Every single policy and legal requirement are clearly stated in the contract. Based on the interview, sighted no complain towards FGV management of mill and estate. Based on the interview, the estate will issue the SPK [Surat Perintah Kerja] for the contractor if the work are lesser than 200 tonnes per month. Together with SPK is Supplier Code of Conduct which been stated the company of child labor and force labour.</p>	<p>The company will continue to keep a good relation between the contractors and FGV management and continuous engagement will be enhanced from time to time to ensure the latest policy of FGV is well communicated</p>
<p><b>Workers Representative from FGV Tenggaroh 9 and 13 and 01 [Indonesian Workers representative]</b></p> <p>The workers representative had been interviewed during the audit in the estates and mill. Based on the interview, the workers shows satisfaction towards the way FGV management treated them as a part of FGV operations. All the amenities, facilities, workers housing and basic needs had been provided by the management. The workers from Indonesia had been working with the company for almost 2 years. Based on the feedback, they showed satisfaction towards the improvement made by the estate management such as preparing the new workers quarters housing and freedom to keep the passport and going to the nearby town. Sighted also the management meeting with the managers [welfare and safety meeting] that been done quarterly to gain the feedback from the workers and resolve the issues arising if any. No absconded workers incident happen in the estate.</p>	<p>FGV management will continue to give full cooperation towards the workers and maintain the commitment in giving the adequate and decent living condition regardless any races or nationality.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p><b>Headmaster from SK LKTP Tenggaroh 5</b></p> <p>The teacher from SK LKTP Tenggaroh had been interview. Head been working for the past 10 years. Based on the interview, the teacher are satisfied towards the commitment made by the FGV management in helping the students such as transportation and extra tuition class been contributed. The teacher had also expressed their appreciation towards FGV in contributing the to the local development of the student by providing the van for FGVPM Tenggaroh. The teacher also willing to know the RSPO Component inside the FGV and the relations so they can use it as part of continuous improvement in school.</p>	<p>FGV PM Tenggaroh 9, 11, and 13 management will keep the close relation with the school, secondary, primary and also kindergarten to ensure the cooperation between the school and FGV being continued.</p>
<p><b>Local People – Peneroka Felda</b></p> <p>Based on the interview, the Settlers had reported no issues related towards the local workers/ foreign workers in the estate. There is a patrolling surrounding the estate and the police had kept the security inside the estate in control. Based on the interview with the settlers, the cooperation between the FGV management and local settlers are in control. Sighted no encroachment by local people or foreign workers to the villagers nearby.</p>	<p>No issues raised. The settlers had expressed the appreciation towards the cooperation given by the FGV management to the local settlers.</p>



<b>4.0</b>	<b>CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY</b>		
<b>4.1</b>	<b>Formal Sign-off of Assessment Findings</b>		
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p style="text-align: center;">Signed on behalf of:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; text-align: center; vertical-align: top;"> <p>Tenggaroh Mill, FGV Holding Bhd General Manager</p>  <p><b><u>Ameer Izyanif Hamzah</u></b> Thursday, 05 March 2020</p> </td> <td style="width: 50%; text-align: center; vertical-align: top;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><b><u>Sandra Purba</u></b> Thursday, 05 March 2020</p> </td> </tr> </table>	<p>Tenggaroh Mill, FGV Holding Bhd General Manager</p>  <p><b><u>Ameer Izyanif Hamzah</u></b> Thursday, 05 March 2020</p>	<p>Mutuagung Lestari Lead Auditor</p>  <p><b><u>Sandra Purba</u></b> Thursday, 05 March 2020</p>
<p>Tenggaroh Mill, FGV Holding Bhd General Manager</p>  <p><b><u>Ameer Izyanif Hamzah</u></b> Thursday, 05 March 2020</p>	<p>Mutuagung Lestari Lead Auditor</p>  <p><b><u>Sandra Purba</u></b> Thursday, 05 March 2020</p>		

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

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
1.	BCSDM - Business Council for Sustainable Development in Malaysia	Suite 803, MBE Pavilion KL, Lot No. B1.03.00, Level B1, Pavilion KL, 168, Jalan Bukit Bintang, 55100 Kuala Lumpur, Malaysia.	<a href="mailto:communication@bcsrcmalaysia.org">communication@bcsrcmalaysia.org</a>	Email	6 January 2020	√	-
2.	National Council of Welfare & Social Development Malaysia - NCWSDM	No. 17, Jalan 1/48A, Bandar Baru Sentul, 51000 Kuala Lumpur, Malaysia.	<a href="mailto:makpem@gmail.com">makpem@gmail.com</a>	Email	6 January 2020	√	-
3.	WWF Malaysia	Jalan PJS 5/28 A Petaling Jaya Commercial Centre (PJCC) 46150 Petaling Jaya Selangor, Malaysia	<a href="mailto:contactus@wwf.org.my">contactus@wwf.org.my</a>	Email	6 January 2020	√	-
4.	Tenggaroh Mill Grading Operator (4 workers) Boiler station (2 workers)	Malaysia	-	Interview	13 January 2020	√	-
5.	Tenggaroh 9 Estate <ul style="list-style-type: none"> <li>• Pesticide applicators (5 workers, 2 India and 3 Bangladesh)</li> <li>• Fertilizer applicators (1 Foreman &amp; 3 workers from Indonesia).</li> <li>• Harvester activity 12 harvesters (1 India, 5 Bangladesh &amp; 6 Indonesia)</li> </ul>	Malaysia	-	Interview	14 January 2020	√	-
6.	Tenggaroh 11 Estate <ul style="list-style-type: none"> <li>• Pesticide applicators (3 Bangladesh workers).</li> <li>• Harvester activity (1 Foreman and 1 Indonesia worker)</li> </ul>	Malaysia	-	Interview	16 January 2020	√	-
7.	Tenggaroh 13 Estate <ul style="list-style-type: none"> <li>• Manual workers (7 local Malaysia).</li> <li>• Harvester activity (2 Bangladesh &amp; 1 Indonesia)</li> </ul>	Malaysia	-	Interview	15 January 2020	√	-
8.	Contractors of FFB Transport For FGV Tenggaroh 9 & 11	Malaysia	-	Interview	14 January 2020	√	-

9.	Workers Representative from FGV Tenggaroh 9 and 13 and 01 [Indonesian Workers representative]	Malaysia	-	Interview	14 January 2020	√	-
10.	Headmaster from SK LKTP Tenggaroh 5	Malaysia	-	Interview	14 January 2020	√	-
11.	Local People – Peneroka Felda	Malaysia	-	Interview	14 January 2020	√	-

**Appendix 2. Assessment Program**

DATE	12 to 17 January 2020	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
<b>Sunday, 12 January 2020</b>		
08.30 - 11.050	<b>Jakarta – Kuala Lumpur (GA 820)</b>	<b>All Auditor</b>
13.00 – 18.00	<b>Travelling from KL to Kota Tinggi Johor → Hotel Kota Tinggi</b>	
<b>Monday, 13 January 2020</b>		
08.00 – 09.00	<b>Opening Meeting in KKS Tenggaroh</b> <ul style="list-style-type: none"> <li>• Auditee Speech (Introduction of PIC, Profile of Mill and Estates Management Unit)</li> <li>• Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Determine of Field Visit Audit, Transparency and Confidentiality Clarification).</li> </ul>	<b>All Auditor</b>
09.00 – 12.00	<b>Document Audit and Field visit to KKS Tenggaroh</b> <ul style="list-style-type: none"> <li>• Supply Chain verification (FFB Receiving, Weighbridge, FFB Sorting, Processing Activity, Dispatch CPO)</li> <li>• Occupational Health &amp; Safety Aspect (Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, POME Pond &amp; Land Application of POME).</li> </ul>	<b>SPA</b>  <b>BPA &amp; EHS</b>
12.00 – 14.00	<b>Break and Lunch</b>	<b>All Auditor</b>
14.00 – 17.00	<ul style="list-style-type: none"> <li>• Continue Field Observation and field observation clarification</li> <li>• Document review &amp; Follow-up and Clarification of Field Observation</li> </ul>	<b>All Auditor</b>
<b>Tuesday, 14 January 2020</b>		

DATE	12 to 17 January 2020	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
08.00 - 12.00	<p><b>Document Audit and Field Visit to FGVPM Tenggaroh 09</b></p> <ul style="list-style-type: none"> <li>• Agronomy (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application; Environmental, Occupational Health &amp; Safety Aspect (PPE Used in Harvest, Manure &amp; Pesticide Application) and Worker Welfare; Conservation Aspect (Inspection of HCV Identified Area, Riparian/Waterways Zone, Reservoir, Forest Area).</li> <li>• Legal Demarcation Aspect (Inspection of Legal Boundary Stones, Community Buffer Area/Enclave).</li> <li>• Worker's Facilities Aspect (Housing, Day-care, Sports Facilities, Employees Meeting Hall, and Sanitary Facilities) &amp; (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, and Waste Management).</li> <li>• Interview &amp; FGD with Worker's Union, Gender Committee, Local Contractor, All Local Communities.</li> </ul>	<b>SPA/BPA/EHS</b>
12.00 – 14.00	<b>BREAK</b>	<b>All Auditor</b>
14.00 – 17.00	<ul style="list-style-type: none"> <li>• Continue Field Observation and field observation clarification</li> <li>• Document review &amp; Follow-up and Clarification of Field Observation</li> </ul>	<b>All Auditor</b>
<b>Wednesday, 15 January 2020</b>		
08.00 - 12.00	<p><b>Document Audit and Field Visit to FGVPM Tenggaroh 13</b></p> <ul style="list-style-type: none"> <li>• Agronomy (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application; Environmental, Occupational Health &amp; Safety Aspect (PPE Used in Harvest, Manure &amp; Pesticide Application) and Worker Welfare; Conservation Aspect (Inspection of HCV Identified Area, Riparian/Waterways Zone, Reservoir, Forest Area).</li> <li>• Legal Demarcation Aspect (Inspection of Legal Boundary Stones, Community Buffer Area/Enclave).</li> <li>• Worker's Facilities Aspect (Housing, Day-care, Sports Facilities, Employees Meeting Hall, and Sanitary Facilities) &amp; (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, and Waste Management).</li> </ul>	<b>All Auditor</b>
12.00 – 14.00	<b>BREAK</b>	<b>All Auditor</b>
14.00 – 17.00	<ul style="list-style-type: none"> <li>• Continue Field Observation and field observation clarification</li> <li>• Document review &amp; Follow-up and Clarification of Field Observation</li> </ul>	<b>All Auditor</b>
<b>Thursday, 16 January 2020</b>		
08.00 - 12.00	<b>Document Audit and Field Visit to FGVPM Tenggaroh 11</b>	<b>All Auditor</b>

DATE	12 to 17 January 2020	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
	<ul style="list-style-type: none"> <li>• Agronomy (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application; Environmental, Occupational Health &amp; Safety Aspect (PPE Used in Harvest, Manure &amp; Pesticide Application) and Worker Welfare; Conservation Aspect (Inspection of HCV Identified Area, Riparian/Waterways Zone, Reservoir, Forest Area).</li> <li>• Legal Demarcation Aspect (Inspection of Legal Boundary Stones, Community Buffer Area/<i>Enclave</i>).</li> <li>• Worker's Facilities Aspect (Housing, Day-care, Sports Facilities, Employees Meeting Hall, and Sanitary Facilities) &amp; (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, and Waste Management).</li> </ul>	
12.00 – 14.00	<b>BREAK</b>	<b>All Auditor</b>
14.00 – 17.00	<ul style="list-style-type: none"> <li>• Continue Field Observation and field observation clarification</li> <li>• Document review &amp; Follow-up and Clarification of Field Observation</li> </ul>	<b>All Auditor</b>
<b>Friday, 17 January 2020</b>		
07.00 – 08.00	<ul style="list-style-type: none"> <li>• Internal discussion by auditor team preparing for Closing Meeting.</li> <li>• <b>Closing Meeting</b></li> <li>• <b>Travelling from Site to KL</b></li> </ul>	<b>All Auditor</b>
08.00 – 10.00		
10.00 – 15.00		
18.05 – 19.05	<ul style="list-style-type: none"> <li>• Kuala Lumpur → Jakarta (GA 9275))</li> </ul>	<b>SPA / BPA</b>