

***Roundtable on Sustainable Palm Oil Certification
RSPO*****[✓] Surveillance**

Name of Management : Sungai Pinang Palm Oil Mill – PT Bina Sains Cemerlang subsidiary of Sime
Organisation : Darby Plantation Berhad
Plantation Name : PT Bina Sains Cemerlang – Sungai Pinang Estate and Bukit Pinang Estate
Location : Village of Sungai Pinang, Sub District of Muara Lakitan, District of Musi Rawas,
Province of Sumatera Selatan, Indonesia
Certificate Code : MUTU-RSPO/020
Date of Initial Registration : 11 September 2012
Date of Last Issued : 29 November 2017 Date of License Issue : 11 November 2019
Date of Certificate Expiry : 10 September 2022 Date of License Expiry : 10 September 2020

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA 1.2	22 to 26 July 2019	Trismadi Nurbayuto (Lead Auditor), Brigitta Prita, Haikal Ramadhan Kharismanasyah & Satria Adi Putra	Leonada	Ardiansyah

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA 1.2	04 November 2019

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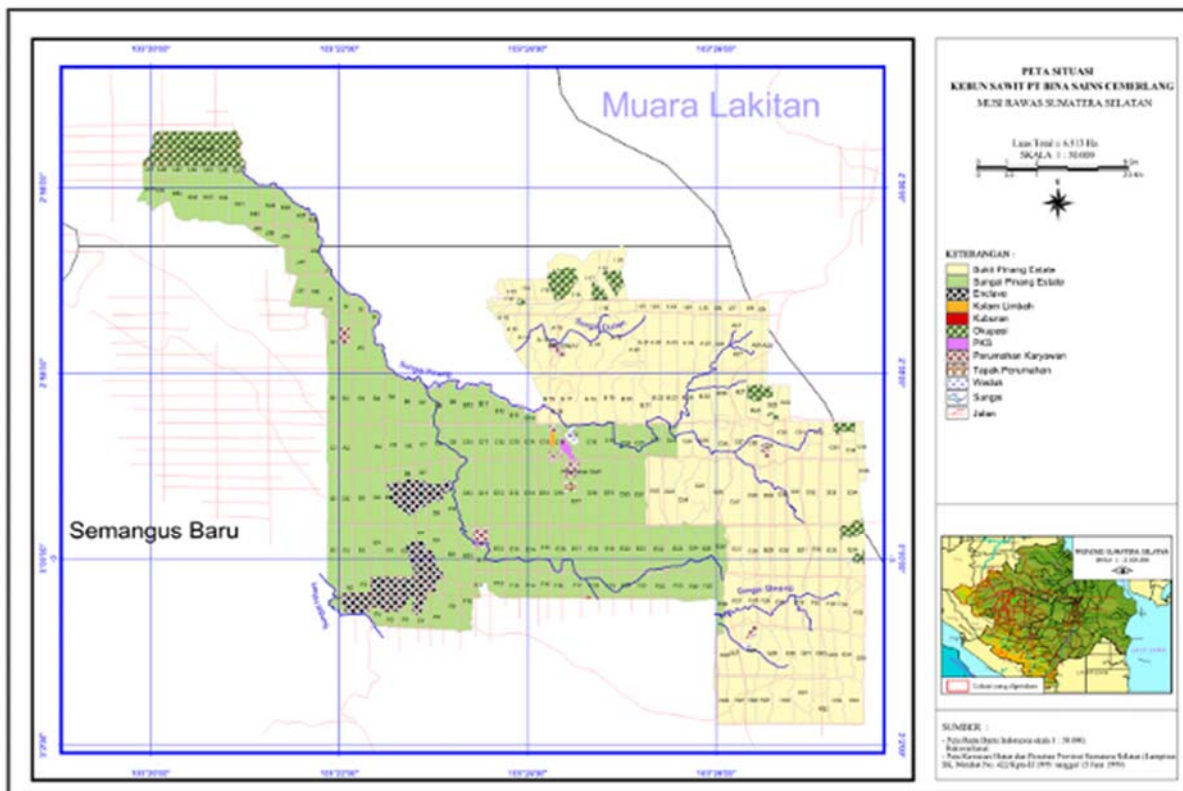
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Figure 1. Location Map of PT Bina Sains Cemerlang.



Figure 2. Operational Map of PT Bina Sains Cemerlang.



Abbreviations Used

AMDAL	:	Analisis Mengenai Dampak Lingkungan (<i>Social and Environmental Impact Assessment</i>)
APAR	:	Alat Pemadam Api Ringan (Fire Extinguisher)
APD (PPE)	:	Alat Perlindungan Diri (<i>Personal Protective Equipment</i>)
B3	:	Bahan Beracun and Berbahaya (<i>Hazardous Material Waste</i>)
BKM	:	<i>Buku Kerja Mandor</i> (Foreman Daily Workbook)
BLHD	:	Badan Lingkungan Hidup Daerah (<i>District Environment Body</i>)
BOB	:	Barn Owl Box
BOD	:	Biological Oxygen Demand
BKSDA	:	Balai Konservasi Sumber Daya Alam
BMS	:	Block Manuring System
BPE	:	Bukit Pinang Estate
BPN	:	Badan Pertanahan Nasional (<i>National Land Agency</i>)
BPJS	:	Badan Penyelenggara Jaminan Sosial
BSC	:	Bina Sains Cemerlang
CD	:	Community Development
CHC	:	Central Housing Complex
CPCL	:	<i>Calon Petani Calon Lahan</i>
CPO	:	Crude Palm Oil
CSR	:	Coorporate Social Responcibility
EFB	:	Empty Fruit Bunch
EIA	:	Environmental Impact Assesment
EM	:	Estate Manager
FFB	:	Fresh Fruit Bunch
GAE	:	Gunung Aru Estate
GAF	:	Gunung Aru Factory
GKE	:	Gunung Kemasan Estate
GHG	:	Green House Gas
HACCP	:	Hazard Analysis Critical Control Point
HCV	:	High Conservation Value (Nilai Konservasi Tinggi)
HGU	:	Hak Guna Usaha. (<i>Land Use Permit</i>)
HIRAC	:	Hazard Identification Risk Assesment & Control
ISO	:	International Prganization for Standardization
ISCC	:	International Sustainability & Carbon Certificate
IUP	:	Izin Usaha Perkebunan. (<i>Plantation Operation Licence</i>)
IPAL (WWTP)	:	Instalasi Penyaluran Air Limbah (<i>Wastewater Treatment Plant</i>)
JAMSOSTEK	:	Jaminan Sosial Tenaga Kerja (<i>Social Assurance of Labor</i>)
K3(OHS)	:	Keselamatan dan Kesehatan Kerja. (<i>Occupational Health and safety</i>)
KLH	:	Kementrian Lingkungan Hidup (<i>Environment Ministry</i>)
KUD	:	<i>Koperasi Unit Desa</i> (Cooperative Village Unit)
LC	:	Land Clearing
LCC	:	Legume Cover Crop
LUCA	:	Land Use Change Analysis
LTE	:	Laut Timur Estate
LSU	:	Leaf Sampling Unit
MMCM	:	Minamas Management Committee Meeting
MSDS	:	Material Safety Data Sheet
NGO	:	Non Government Organization
OHS	:	Occupational Health & Safety
OER	:	Oil Extraction Rate

PHT	:	Pengendalian Hama Terpadu (<i>Integrated Pest Management</i>)
PK	:	Palm Kernel
PKO	:	Palm Kernel Oil
PKS (<i>POM</i>)	:	Pabrik Kelapa Sawit (<i>Palm Oil Mill</i>)
PKWT	:	Perjanjian Kerja Waktu Tertentu (<i>Temporary Work Agreement Letter</i>)
PP	:	Peraturan Pemerintah (<i>Government Regulation</i>)
PPE	:	Personal Protective Equipment
PTE	:	Pantai Timur Estate
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluents
PPLH	:	<i>Pusat Penelitian Lingkungan Hiduo</i>
RKL/RPL	:	Rencana Kelola Lingkungan/ Rencana Pemantauan Lingkungan (<i>Environmental Management Plan/ Environment Monitoring Plan</i>)
RKS/RPS	:	Rencana Kelola Sosial/ Rencana Pemantauan Sosial (<i>Social Management Plan/ Social Monitoring Plan</i>)
RTE	:	Rare Threatened Endangered
PSD	:	Plantation Services Departement
PSQM	:	Plantation Sustainability and Quality Management
SIA	:	Social Impact Assessment
SEIA	:	Social Environmental Impact Assesment
SKU	:	<i>Syarat Kerja Umum</i> (<i>General Work Condition</i>)
SOP	:	Standard Operating Procedure
SOU	:	Strategic Operating Unit
SP	:	Serikat Pekerja (<i>Worker Union</i>)
SPE	:	Sungai Pinang Estate
SPF	:	Sungai Pinang Factory
SPK	:	Surat Perjanjian Kerja (<i>Minutes of Agreement</i>)
TBS (<i>FFB</i>)	:	Tandan Buah Segar (<i>Fresh Fruit Bunches</i>)
TBM	:	Tanaman Belum Menghasilkan (<i>Immature Plant</i>)
TM	:	Tanaman Menghasilkan (<i>Mature Plant</i>)
WLTK	:	Wajib Lapor Tenaga Kerja (<i>Labor compulsory report</i>)
UKL/UPL	:	Upaya Kelola Lingkungan/ Upaya Pemantauan Lingkungan (<i>Environmental Management Efforts/ Environment Monitoring Efforts</i>)

1.0	SCOPE of the CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used	<ul style="list-style-type: none"> <i>National Interpretation RSPO Principles and Criteria 2013 for Indonesia in July 2016, approved RSPO Governors 30 September 2016.</i> <i>RSPO Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014 revised on 14 June 2017 (Module D / E for CPO Mill).</i> <i>RSPO Certification System for Principles and Criteria, 14 June 2017.</i> 	
1.2	Organisation Information		
1.2.1	Organisation name listed in the certificate	PT Bina Sains Cemerlang –Sime Darby Plantation Berhad.	
1.2.2	Contact person	Alagendran A.L Maniam	
1.2.3	Organisation address and site address	RSPO registered company: No 2, Plantation Tower, PJU 1A/7Street, Petaling Jaya, Malaysia 47301. Liaison Office: The Plaza Office Tower, 36 Floor, JL. MH Thamrin Kav. 28-30, Jakarta 10350, Indonesia.	
1.2.4	Telephone	+62-21-29926000	
1.2.5	Fax	+62-21-29922686	
1.2.6	E-mail	alagendran.maniam@simeidarbyplantation.com	
1.2.7	Web page address	www.simeidarbyplantation.com	
1.2.8	Management Representative who completed the application for certification	Alagendran A.L Maniam (Head of Sustainability Minamas Plantation)	
1.2.9	Registered as RSPO member	1-0008-04-000-00 07 September 2004	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Palm Oil Mill and supply base <ul style="list-style-type: none"> Sungai Pinang Mill, Sungai Pinang Estate, & Bukit Pinang Estate. 	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			Latitude Longitude
	Sungai Pinang	Village of Sungai Pinang, Sub District of Muara Lakitan, District of Musi Rawas, Sumatera Selatan Province	S 02° 59' 05" E 103° 24' 21"

1.4.2	Location of Certification Scope of Supply Base			
	Name of Supply Base	Location	Coordinate	
			Latitude	Longitude
	Sungai Pinang Estate	Village of Sungai Pinang, Anyar, Semangus Lama, Semangus Baru and Muara Lengas, Sub District of Muara Lakitan, District of Musi Rawas, Sumatera Selatan Province, Indonesia	S 02° 59' 13"	E 103° 24' 25"
	Bukit Pinang Estate	Village of Sungai Pinang, Anyar, Semangus Lama, Semangus Baru and Muara Lengas, Sub District of Muara Lakitan, District of Musi Rawas, Sumatera Selatan Province, Indonesia	S 02° 59' 14"	E 103° 24' 20"
1.5	Description of Area Statement			
1.5.1	Tenure			
	• State		6,513	Ha
	• Community		-	Ha
1.5.2	Area Statement			
	• Total area		6,513.00 Ha	
	• Planted Area :			
	- Mature		4,722.84 Ha	
	- Immature		1,462.80 Ha	
	• Nursery		18.45 Ha	
	• Road/bridge/trenches		160.99 Ha	
	• Building		82.58 Ha	
	• Mill		14.78 Ha	
	• HCV		44.07 Ha	
	• Occupation		6.20 Ha	
	• Others area (Kampung or public)		0.29 ha	
1.6	Planting Year and Cycles			
1.6.1	Age profile of planting year			
	Planting Year	Hectares (Ha)		
		Sungai Pinang Estate	Bukit Pinang Estate	Total
	1992	-	227.19	227.19
	1993	64.63	57.28	121.91
	1994	-	233.48	233.48
	1996	407.31	146.45	553.76
	1997	122.04	102.43	224.47
	1998	471.5	380.89	852.39
	2000	177.46	-	177.46
	2005	-	190.61	190.61

	2009	-	14	14			
	2010	-	51.72	51.72			
	2013	130.24	206.04	336.28			
	2014	228.84	279.61	508.45			
	2015	505.81	393.82	899.63			
	2016	128	203.50	331.50			
	Total Mature Area	2,235.83	2,487.01	4,722.84			
	2016	214.54	292.52	507.06			
	2017	306.71	181.55	488.26			
	2018	145.77	218.67	364.44			
	2019	103.04	-	103.04			
	Total Immature area	770.06	692.74	1,462.80			
	GRAND TOTAL	3,005.89	3,179.75	6,185.64			
	1.6.2	New Planting area after January 2010		-	Ha		
1.6.3	Planting Cycle		1 st Cycle				
1.7	Description of Mill and Supply Base						
1.7.1	Description of Mill						
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel	
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)
	Sungai Pinang	30	77,869.78	16,488.90	21.17	3,612.63	4.64
	*Production data source from July 1 st 2019 until June 30 ^h 2019.						
1.7.2	Description of Certification Scope of Supply Base						
	Name of Estate	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)	Supplied to Mill	
						FFB (tonnes/year)	%
	Sungai Pinang	3,374.42	2,235.83	35,548.48	14.29	35,548.48	100
	Bukit Pinang	3,138.58	2,487.01	42,321.30	18.93	42,321.30	100
	TOTAL	6,513.00	4,722.84	77,869.78	16.49	77,869.78	100
	*Production data source from July 1 st 2019 until June 30 ^h 2019.						
1.7.3	FFB description from other source						
	Name of sources/Organisation (RSPO certified / non-certified)	Type of Organisation	number of smallholders	Production Area (Ha)	Supplied to Mill		
					FFB (tonnes/year)		
	-	-	-	-	-		
	TOTAL					-	
	*Production data source from July 1 st 2019 until June 30 ^h 2019.						
1.7.4	Product categories			FFB, CPO, PK			
1.8	Tonnage of Product						
1.8.1	Past Annual Claim Certified Product			Previous Certificate Claim (tonnes/year)		Actual certified product for last year	

					(tonnes/year)			
	• FFB Production	77,900	77,869.78					
	• CPO Production	16,988	16,488.90					
	• Palm Kernel (PK) Production	3,685	3,612.63					
	<i>*There is extended volume for FFB, CPO & PK Production.</i>							
1.8.2	Product selling							
	Tonnage of selling product	Period of actual selling product for last year (MT)						
	• CSPO sold as RSPO certified product				0			
	• CSPK sold as RSPO certified product				0			
	• CSPO sold under other scheme				0			
	• CSPK sold under other scheme				0			
	• CSPO sold as conventional				16,346			
	• CSPK sold as conventional				3,446			
1.8.3	Estimate of Certified FFB Claim							
	Name of Estates	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)			
	Sungai Pinang Estate	3,374.42	2,235.83	37,300	15			
	Bukit Pinang Estate	3,138.58	2,487.01	44,400	19.88			
	TOTAL	6,513.00	4,722.84	81,700	17.31			
	<i>*Projected FFB production for 11 September 2019 to 10 September 2020</i>							
1.8.4	Estimate of Certified Palm Product Claim							
	Name of Mill	Capacity (tonnes/hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel		Supply Chain Module
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)	
	Sungai Pinang	30	81,700	18,790	23	4,085	5	IP
	<i>*Projected CSPO and CSPK production for 11 September 2019 to 10 September 2020</i>							
1.9	Other Certifications							
	ISPO			MUTU-ISPO/090 → 4 August 2017 – 3 August 2022				
1.10	Time Bound Plan							
1.10.1	Time Bound Plan for Other Management Units							
1.10.1	Time Bound Plan for Other Management Units							
	Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status		
	Mill	Time bound						
	INDONESIA							
1	Sekunyir. PT. Indotruba Tengah	2010	Sekunyir	2010	Seruyan and West Kotawaringin District – Central Kalimantan	Certified		
			Seruyan	2010		Certified		
2	Manggala. PT. Tungal Mitra Plantations	2010	Manggala 1	2010	Rokan Hilir District – Riau	Certified		
			Manggala 2	2010		Certified		
			Manggala 3	2010		Certified		

3	Bukit Ajong PT. Sime Indo Agro	2010	West	2010	Sanggau District –West Kalimantan	Certified
			West (HGU on process)	2019		-
			East	2010		Certified
			East (HGU on process)	2019		-
			East Plasma	2010		Certified
			West Plasma	2010		Certified
			Sei Mawang	2019		-
4	Teluk Siak. PT Aneka Inti Persada	2011	Teluk Siak	2011	Siak District – Riau	Certified
			Pinang Sebatang	2011		Certified
			Aneka Persada	2011		Certified
5	Sungai Pinang. PT. Bina Sains Cemerlang	2012	Sungai Pinang	2012	Musi Rawas District – South Sumatera	Certified
			Sungai Pinang (HGU on process)	2020		-
			Bukit Pinang	2012		Certified
			Bukit Pinang (HGU on process)	2020		-
6	Pematang. PT. Teguh Sempurna	2011	Pematang	2011	Seruyan and East Kotawaringin District – Central Kalimantan	Certified
			Kawan Batu	2011		Certified
			Hatan Tiring	2011		Certified
			Batang Garing	2011		Certified
7	Alur Dumai. PT Lahan Tani Sakti	2011	Alur Dumai	2011	Rokan Hilir District – Riau	Certified
8	Teluk Bakau. PT. Bhumireksa Nusa Sejati	2011	Teluk Bakau	2011	Indra Giri Hilir District – Riau	Certified
			Nusa Perkasa	2011		Certified
			Nusa Lestari	2011		Certified
9	Mandah PT. Bhumireksa Nusa Sejati	2014	Mandah	2011	Indra Giri Hilir District – Riau	Certified
			Rotan Semelur	2011		Certified
10	Angsana. PT Ladangrumpun Suburabadi	2011	Angsana	2011	Tanah Bumbu District – South Kalimantan	Certified
			Gunung Sari	2011		Certified
			Pantai Bonati	2011		Certified
			KKPA-1 PT.SHE	2013		Certified
			KKPA-4 PT.SHE	2013		Certified
11	Mustika. PT Sajang Heulang	2013	Mustika	2013	Tanah Bumbu District – South Kalimantan	Certified
			KKPA-2 PT.SHE	2013		Certified
			KKPA-3 PT.SHE	2013		Certified
			KKPA-5 PT.SHE	2013		Certified
			SAP 1	2020		-
12	Gunung Aru. PT Bersama Sejahtera Sakti	2011	Gunung Aru	2011	Kotabaru District – South Kalimantan	Certified
			Gunung Kemas	2011		Certified
			Laut Timur	2011		Certified

			Pantai Timur	2011		Certified
			KKPA BSS	2020		-
13	Bebunga. PT. Langgeng Muaramakmur	2011	Bebunga	2011	Kotabaru District – South Kalimantan	Certified
			Bakau	2011		Certified
			Sungai Cengal	2011		Certified
14	Sukamandang PT Kridatama Lancar	2011	Sukamandang	2011	Seruyan and East Kotawaringin District – Central Kalimantan	Certified
			Sapiri	2011		Certified
			Barasdanum	2011		Certified
			Kuala Kuayan	2011		Certified
15	Pondok Labu. PT Paripurna Swakarsa	2012	Binturung	2012	Kotabaru District – South Kalimantan	Certified
			Pondok Labu	2012		Certified
			Rampa	2012		Certified
			Sesulung	2012		Certified
16	Rantau. PT Laguna Mandiri	2012	Rantau	2012	Kotabaru District – South Kalimantan	Certified
			Matalok	2012		Certified
			KKPA Sungai Cengal (1,382 SH)	2014		Certified
			Selabak (PT SAA)	2012		Certified
			Randi (PT SAA)	2012		Certified
			Sangkoh (PT SAA)	2012		Certified
			Lanting (PT LMR)	2012		Certified
17	Betung. PT Laguna Mandiri	2014	Betung	2012	Kotabaru District – South Kalimantan	Certified
			Sekayu	2012		Certified
18	Ungkaya. PT Tamaco Graha Krida	2012	Ungkaya	2012	Morowali District – Sulawesi Tengah	Certified
			Plasma TGK	2020		-
19	Ladang Panjang. PT Bahari Gembira Ria	2012	Ladang Panjang	2012	Muaro Jambi District - Jambi	Certified
			Ladang Panjang (HGU on process)	2020		-
			Plasma BGR	2020		-
20	Rantau Panjang. PT Guthrie Pecconina Indonesia	2012	Rantau Panjang	2012	Musi Banyuasin District – South Sumatera	Certified
			Rantau Panjang (HGU on process)	2020		-
			Bumi Ayu	2012		Certified
			Karang Ringin	2012		Certified
			Napal	2012		Certified
			Napal (HGU on process)	2020		-
			Mangun Jaya	2012		Certified
			Mangun Jaya (HGU on process)	2020		-
			Sungai Jernih	2020		-
			GPI KKPA	2020		-

21	Blang Simpo. PT Perkasa Subur Sakti	2013	Tamiang (PT PPP)	2013	Aceh Tamiang and East Aceh District – Aceh	Certified
			Batang Ara (PT PSK)	2013		Certified
			Blang Simpo-01	2013		Certified
			Blang Simpo-02	2013		Certified
22	MAS. PT Mitra Austral Sejahtera	2020	MAS 1	2019	Sanggau District – West Kalimantan	-
			MAS 1	2019		-
			MAS 1	2019		-
			Plasma MAS	2020		-
23	Lembiru. PT Sandika Nata Palma	2014	Lembiru	2014	Ketapang District – West Kalimantan	Certified
			Awatan	2014		Certified
			Karya Palma	2019		-
			KKPA SNP	2020		-
			Pelanjau (PT BAL)	2019		IC
			Sungai Putih (PT BAL)	2019		-
			Baturus (PT BAL)	2019		-
			KKPA BAL	2020		-
MALAYSIA						
1	Sg Dingin SOU 1	2010	Bukit Hijau	2010	Kerangan, Kedah	Certified
			Padang Buluh	2010		Certified
			Bukit Selangor	2010		Certified
			Sg Dingin	2010		Certified
			Jentayu	2010		Certified
			Anak Kuli	2010		Certified
			Somme	2010		Certified
2	Chersonese SOU 2	2011	Chersonese	2011	Kuala Kurau, Perak	Certified
			Holyrood	2011		Certified
			Kalumpang	2011		Certified
			Tali Ayer	2011		Certified
3	Elphil SOU 3	2011	Kinta Kellas	2011	Sg Siput, Perak	Certified
			Elphil	2011		Certified
			Kamuning	2011		Certified
4	Flemington SOU 4	2011	Flemington	2011	Teluk Intan, Perak	Certified
			Bagan Datoh	2011		Certified
			Sabak Bernam	2011		Certified
			Sg Samak	2011		Certified
5	Seri Intan SOU 5	2011	Seri Intan (Main Division)	2011	Teluk Intan, Perak	Certified
			Sabrang	2011		Certified
			Sg Wangi	2011		Certified
			Sogomana (Main Division)	2011		Certified

6	Selaba SOU 5	2011	Seri Intan (Selaba Division)	2011	Teluk Intan, Perak	Certified
			Sogomana (Cashwood & Sg Beruas Division)	2011		Certified
			Bikam	2011		Certified
			Clumy	2011		Certified
7	Tennamaram SOU 6	2011	Tennamaram	2011	Bestari Jaya, Selangor	Certified
			Sungei Buloh	2011		Certified
			Bkt Talang	2011		Certified
8	Bkt Kerayong SOU 7	2011	Bkt Kerayong	2011	Kapar, Selangor	Certified
			Bkt Cherakah	2011		Certified
			Bkt Rajah	2011		Certified
			Bkt Lagong	2011		Certified
			Elmina	2011		Certified
9	East SOU 8	2010	East	2010	Carey Island, Selangor	Certified
			Dusun Durian	2010		Certified
			Sepang	2010		Certified
10	West - SOU 9	2010	West	2010	Carey Island, Selangor	Certified
11	Bukit Putri - SOU 10	2011	Bukit Putri	2011	Raub, Pahang	Certified
12	Kerdau SOU 11	2011	Kerdau	2011	Temerloh, Pahang	Certified
			Jentar	2011		Certified
			Mentakab	2011		Certified
			Sg Mai	2011		Certified
			Chenor	2011		Certified
13	Jabor - SOU 12	2011	Jabor	2011	Kuantan, Pahang	Certified
14	Labu SOU 13	2011	Labu	2011	Nilai, Negeri Sembilan	Certified
			New Labu	2011		Certified
			Bradwall	2011		Certified
15	Tanah Merah SOU 14	2010	Tanah Merah	2010	Port Dickson, Negeri Sembilan	Certified
			Sua Betong	2010		Certified
			Bukit Pelandok	2010		Certified
16	Sua Betong SOU 15	2014	Salak	2014	Port Dickson, Negeri Sembilan	Certified
			Sengkang	2014		Certified
			Siliau	2014		Certified
			PD Lukut	2014		Certified
			Sungai Baru	2014		Certified
			Tampin Linggi	2014		Certified
17	Kok Foh SOU 16	2011	Bukit Pilah	2011	Bahau, Negeri Sembilan	Certified
			Kok Foh	2011		Certified
			Muar River	2011		Certified

			St. Helier	2011		Certified
			Pertang	2011		Certified
			Sg Gemas	2011		Certified
			Sg Sebalang	2011		Certified
			Sg Senarut	2011		Certified
18	Kempas SOU 17	2010	Kempas	2010	Jasin, Melaka	Certified
			Kemuning	2010		Certified
			Tangkah	2010		Certified
19	Diamond Jubilee SOU 18	2011	Bukit Asahan	2011	Jasin, Melaka	Certified
			Diamond Jubilee	2011		Certified
			Serkam	2011		Certified
20	Pagoh SOU 19	2014	Pagoh	2014	Muar, Johor	Certified
			Lanadron	2014		Certified
			Pengkalan Bukit	2014		Certified
			Welch	2014		Certified
21	Chaah SOU 20	2010	North Labis	2010	Chaah, Johor	Certified
			Cha'ah	2010		Certified
			Sg Simpang Kiri	2010		Certified
22	Gunung Mas SOU 21	2010	Gunung Mas	2010	Kluang, Johor	Certified
			Kempas Klebang	2010		Certified
			Bukit Paloh	2010		Certified
			Yong Peng	2010		Certified
23	Bukit Benut SOU 22	2011	Bukit Benut	2011	Kluang, Johor	Certified
			CEP Niyor	2011		Certified
			Lambak / Elaeis	2011		Certified
24	Ulu Remis SOU 23	2011	Pekan	2011	Layang-layang, Johor	Certified
			Sembrong	2011		Certified
			Tun Dr. Ismail	2011		Certified
			Ulu Remis	2011		Certified
			Bukit Badak	2011		Certified
			Cenas	2011		Certified
25	Hadapan SOU 24	2011	CEP Rengam	2011	Layang-layang, Johor	Certified
			Kulai	2011		Certified
			Layang	2011		Certified
			Seri Pulai	2011		Certified
26	Sandakan Bay SOU 26	2008	Tun Tan Siew Sin	2008	Sandakan, Sabah	Certified
			Tunku	2008		Certified
			Tigowis	2008		Certified
			Sentosa	2008		Certified

			Saguliud	2008		Certified
27	Melalap SOU 27	2011	Melalap	2011	Tenom, Sabah	Certified
			Sapong	2011		Certified
28	Binuang SOU 28	2009	Tingkayu	2009	Kunak, Sabah	Certified
			Sungang	2009		Certified
			Jelata Bumi	2009		Certified
			Binuang	2009		Certified
29	Giram SOU 29	2009	Mostyn	2009	Kunak, Sabah	Certified
			Giram	2009		Certified
30	Merotai SOU 30	2009	Imam	2009	Tawau, Sabah	Certified
			Merotai	2009		Certified
			Table	2009		Certified
			Tiger	2009		Certified
31	Lavang SOU 31	2011	Belian	2011	Bintulu, Serawak	Certified
			Kelida	2011		Certified
			Lavang	2011		Certified
			Lavang (SE)	2011		Certified
			Rasan	2011		Certified
			Chartquest	2011		Certified
			Dulang	2011		Certified
			Peroh	2011		Certified
			Pekaka	2011		Certified
			Ruai	2011		Certified
32	Rajawali SOU 32	2011	Rajawali	2011	Bintulu, Serawak	Certified
			Samudera	2011		Certified
			Semarak	2011		Certified
			Bayu	2011		Certified
33	Derawan SOU 33	2011	Takau	2011	Bintulu, Serawak	Certified
			Damai	2011		Certified
			Derawan	2011		Certified
			Sahua	2011		Certified
LIBERIA						
1	Grand Cape Mount	2018	Matambo	2018	Grand Cape Mount, Liberia	IC
			Grand Cape Mount	2018		IC
			Zodua	2018		IC
			Bomi	2018	Bomi, Liberia	IC
			Lofa	2018		IC
P & G (New Britain Palm Oil)						

1	Poliamba	2012	Kara	2012	Kevieng, New Ireland Province, P&G	Certified
			West Coast	2012		Certified
			Nalik	2012		Certified
			Noatsi	2012		Certified
			Madak	2012		Certified
			North (Smallholders)	2012		Certified
			South (Smallholders)	2012		Certified
			West (Smallholders)	2012		Certified
2	Tetere	2011	Tetere	2011	Gudaicanal, Slomon Island	Certified
			Ngalimbiu	2011		Certified
			Mbalisuna	2011		Certified
			West Zone (Smallholders)	2011		Certified
			Central Zone (Smallholders)	2011		Certified
			MBA East (Smallholders)	2011		Certified
			MBA West (Smallholders)	2011		Certified
3	Sangara, Sambiripa & Mamba	2013	Sangara	2013	Higaturu, Popondetta, Oro, P&G	Certified
			Sumberipa	2013		Certified
			Ambogo	2013		Certified
			Embi	2013		Certified
			Mamba	2013		Certified
			Sorovi (smallholders)	2013		Certified
			Igora (smallholders)	2013		Certified
			Saiho (smallholders)	2013		Certified
			Aeka (smallholders)	2013		Certified
			Ilimo (smallholders)	2013		Certified
4	Gusap	2010	Dumpu	2010	Madang, P&G	Certified
			Surinam	2010		Certified
			Jephcott	2010		Certified
			Gusap	2010		Certified
			Paddox	2010		Certified
			Ngaru	2010		Certified
			Madang VOP (smallholders)	2010		Certified
			Morobe VOP (smallholders)	2010		Certified
5	Hagita	2013	Giligili	2013	Milne Bay, P&G	Certified
			Hagita	2013		Certified
			Waigani	2013		Certified
			Sagarai	2013		Certified

			Padipadi	2013		Certified
			Mariawatte	2013		Certified
			East Gurney	2013		Certified
			West Gurney	2013		Certified
			East Sagarai	2013		Certified
			West Sagarai	2013		Certified
6	Mosa Kumbango Kapiura Namumdo Waraston	2008	Bebere	2008	West New Britain	Certified
			Kumbango	2008		Certified
			Togulo	2008		Certified
			Dami	2008		Certified
			Waisisi	2008		Certified
			Kautu	2008		Certified
			Karaus	2008		Certified
			Moroa	2008		Certified
			Bilomi	2008		Certified
			Loata	2008		Certified
			Haella	2008		Certified
			Garu	2008		Certified
			Daliavu	2008		Certified
			Sapuri	2008		Certified
			Malilimi	2008		Certified
			Rigula	2008		Certified
			Nomundo	2008		Certified
			Navarai / Karato ME	2008		Certified
			Volupai . Lotomgam / Natupi / Goruru	2008		Certified
			Lolokoru	2008		Certified
			Silovoti	2008		Certified
			LSS Hoskin (1,877 Smallholders)	2008		Certified
			VOP East (1,815 Smallholders)	2008		Certified
			VOP Central (1,958 Smallholders)	2008		Certified
			VOP West (1,277 Smallholders)Kaulong / Akamie / Pusiki / Repamira / Sakapei / KDC ME (21 large smallholders)	2008		Certified
			LSS Kapiura (847 Smallholders)	2008		Certified
			VOP Kapiura (551 Smallholders)	2008		Certified

	<p>Sime Darby has achieved 34 management units in Malaysia, 25 management units in Indonesia, 10 management units in P&G that RSPO certified. Total management unit in Sime Darby Plantation Bhd are 34 in Malaysia, 25 in Indonesia and 10 in P&G. In the year of 2016 & 2017 there are three Mill that are no longer operating, and for the supplying base (Estate) is diverted to a mill that is still operating and has been certified RSPO. The mills are:</p> <ol style="list-style-type: none"> 1. Angsana Mini Mill, PT Sajang Heulang: Mill stop operate since 2016 and the supply bases is transfer to Angsana POM, PT Ladangrumpun Subur Abadi. 2. Selabak Mill, PT Swadaya Andhika: Mill stop operate since 2017 and the supply bases is transfer to Rantau POM, PT Laguna Mandiri 3. Pekaka, SOU 34: Mill stop operate since 2017 and the supply bases is transfer to Lavang, SOU 31 <p>A new mill will be set up in Liberia and planned for commissioning in February 2016. Preparation to undergo the RSPO Certification process is in progress and Sime Darby Plantation Bhd targets to undergo RSPO Certification by end 2017. RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed on 2018.</p> <p>There was change of the Time Bound Plan under Sime Darby on April 2019 cause the Sime Darby postpone the others certification process. Change of the Time Bound Plan explanation: PT Mitra Austral Sejahtera. There are social issue still unresolved from the <i>Serikat Petani Kelapa Sawit</i> (SPKS) Sanggau, however the improvement are in progress. Sime Darby has informed the Time Bound Plan progress, MUTU has consider that Sime Darby still comply with the RSPO requirement for partial certification.</p>
1.10.2	<p>Progress of Associated Smallholders and Out growers for Certifiable Standard</p>
	<p>Smallholders.</p> <p>Location permit for development of smallholder's plantation Palm oil on behalf PT Bina Sains cemerlang according decision of Musi Rawas Regent with number 373/KPTS/BPM-PTP/2015 with scope area \pm 1,350 ha located in Muara Lakitan District & Musi Rawas Regency.</p> <p>Based on interview with Management representative planting of plasma just begin on June 2019 with total area 100 ha (Full managed). Based on that, the company just have Location permit for plasma. The area still on progress.</p>

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA 1.2	<p>1. Trismadi Nurbayuto (Lead Auditor). Indonesian Citizen. Diploma of Forest Management from Forestry Faculty; Associate Degree of Economic from Economic and Management. He has experienced as field assistant on oil palm plantation year of 2008. Therefore he has experienced as HCV and SEIA Assessor on 2010-2013. He has been followed HCV identification and management training; ISO training (9001;14001; 22000); ISPO Lead Auditor's training; Safety Expert; RSPO Lead Auditor's; OHS Auditors by Government Regulation No 50 year of 2012; and RSPO Next. He has been conducted audit on ISPO and RSPO scheme since year of 2013 as an Auditor on several aspect as environment, OHS, Legality, Best Management Practices, Social, Worker Welfare, Conflict Resolutions, Long term Business Plan and Supply Chain on Palm Oil Mill. During this assesment verified Environment, GHG and HCV.</p> <p>2. Brigitta Prita (Auditor). Indonesia Citizen. Bachelor of Forestry, Department of Forest Resources Conservation and Ecotourism. She had attended Training ISPO by Commission ISPO on June 2013, Training ISO 9001:2008 Quality Management System on January 2014, In House Training 17021 and 17065 management system and Product Quality, Training High Conservation Value by IPB on September 2015, In House Training HCV on August 2016, In House Training Roundtable Sustainable Palm Oil on January 2014; In House Training ISO 14000:2004 Environmental Management System. She has been audit experience ISPO & RSPO since April 2013 in the environmental, conservation, waste management and worker welfare aspects. During this assment verified Legal, Social, SCCS, Partial Certification and Time Bound Plan.</p> <p>3. Haikal Ramadhan Kharismansyah (Auditor). Indonesian citizen, Bachelor of Agriculture department of plant and pest disease (Agrotechnology). He has 3 years experience as an Agronomy Staff in private oil palm plantation in Indonesia. Training which had attended including Basic Management Development Program Agronomy, Integrated Urban Pest Management, Integrated Pest Management, ISO 9001 : 2015, Auditor ISPO, RSPO awareness, OHSAS 18001, ISO 22000 awareness. Did some audit ISPO scheme with aspects Best management practices. During this assessment, He verified related OHS and Worker Welfare.</p> <p>4. Satria Adi Putra (Auditor). Indonesian citizen, Diploma III majoring in Palm Oil Plantation. Have experience of work more than six years since 2009 as the operational staff of private oil palm plantations in Indonesia. Training have been followed including Occupational Health and Safety Expert, Orang Utan and Wildlife Management, ISPO Auditor Training, RSPO Awareness, IHT Potential Mapping and Conflict Resolution in Production Forests, OHSAS 18001, SA 8000, RSPO Lead Training, Lead Auditor Training for ISO 9001, ISO 14001, ISO 17021, ISO 17065, ISO 19011, ISO 22000. During this audit, he verify related Best Management Practices, Transparancies and Long Term Business Plan.</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA 1.2	<p>Number of auditors : 4 auditor</p> <p>Number of days for ASA 1.2 at site : 4 days</p> <p>Number of working days for ASA 1.2 at site: 16 Working days.</p>
2.2.2	Assessment Process
ASA 1.2	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT. Bina Sains Cemerlang to the requirements of <i>Indonesian National Interpretation of RSPO Principles and Criteria 2013 by INA-NITF, July 2016 (Endorsed by the RSPO Board of Governors meeting on 30th September 2016) and RSPO Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014 Revised June 2017 (Module D for CPO Mill)</i>.</p> <p>The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) interview, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site.</p>

Some opportunities for improvement of the results Recertification delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase (ASA-1.3).

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

The assessment program please find Appendix 2.

2.2.3	Locations of Assessment
ASA 1.2	<p>Sungai Pinang Factory.</p> <ul style="list-style-type: none"> • Effluent Pond. There is no indication leakage of waste water. The company has also implemented rehabilitation near of effluent pond with forest plants. • Water Treatment Plant. Observation and interview related to water management, water use records, medical check up for operator, PPE issuance and hazardous waste management. • Temporary Hazardous Waste Store, Sungai Pinang Fatory. Observation related to the hazardous waste balance, building and symbol condition is inaccordance to permit. • Workshop. Observations and interview with welder related to the OHS implementation, worker welfare and the hazardous waste management. • Chemical Store. Field observations related to OHS implementation, hazardous and toxic materials symbol. • Engine room. Observations and interviews regarding operator licenses and PPE • Kernel. Observation regarding PPE and job desk workers. <p>Sungai Pinang Estate.</p> <ul style="list-style-type: none"> • Land Application, Block F12, Division 1, SPE. Observation of wells water quality monitoring location. There has also no indication leakage of waste water on the flatbed. • Well Monitor on Non Land Application area, Block F13, Division 1, SPE. Observation of wells water quality monitoring location. • Well Monitor on Housing area, traction housing. Observation of wells water quality monitoring location. • Water Intake (Pinang River), Block F13, Division 1, SPE. Observation of river conditions for FFB processing in the Mill. • Fertilizer warehouse. Observation regarding fertilizer management and storage • Pesticide Warehouse. Observation regarding the storage and management of pesticides • BMS and BSS House. Observation regarding the storage of tools and pest control equipment and security in the application of fertilizers and pesticides • Housing Division 3. Observation and interview with residents of housing regarding employee welfare facilities and domestic waste management • CHC (Central Housing Complex). Observations and interviews with residents of housing regarding employee welfare facilities and domestic waste management • Housing contractor. Observations and interviews with residents of housing regarding employee welfare facilities and domestic waste management • Clinic. Observation regarding employee health service facilities and infrastructure • Landfill. Observation regarding domestic waste management. • Harvesting, Block E7-8, Division III. Observation and interview with Foreman and Harvesters team towards technical, manpower, OHS, environment and conservation aspects. • Nursery, Division II. Observation and interview with foreman, water pump operator regarding to OHS, environment and best practices aspects. • Pest and Desease Cencus, Block F12, Division II. Observation related pest management and cencus technic. • Pesticide/weeding application (Glyphosate), Block G17, Division 2. Observation and interview with Foreman and 9 pesticide Applicators towards technical, manpower, OHS, environment and conservation aspects. • Erosion Pole, Block H13, Division I. Observation related soil management and soil monitoring.

	Bukit Pinang Estate. <ul style="list-style-type: none"> • Housing 2 division II. Observations and interviews with residents of housing regarding employee welfare facilities and domestic waste management. • Daycare Housing 2. Observation of facilities and infrastructure for day care centers. • Landfill. Observation regarding domestic waste management. • Pesticide Warehouse. Observation regarding the storage and management of pesticide. • Fertilizer Warehouse. Observation regarding fertilizer storage and management. • BMS and BSS House. Observation regarding the storage of tools and pest control equipment and security in the application of fertilizers and pesticides. • Nest Box & Undulating Area, Block D11. Division I. Observation of Nest Box condition and soil management. • Replanting Area & Replanting Contractor, Division I. Observation related replanting program, contractor replanting insurance, OHS, environment management and HCV area • Pesticide/weeding application (Glyphosate), Block G17, Division 2. Observation and interview with Foreman and 9 pesticide Applicators towards technical, manpower, OHS, environment and conservation aspects. • Manuring, Block I22 Division III. Observation related manuring system, manpower, OHS and Environment/HCV. • Empty Fruit Bunch, Block D11, Division I. Observation the EFB application location with dosage 200 Kg per plants.
2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ASA 1.2	<p>Summary of stakeholder consultation process</p> <p>Consultation of stakeholders for PT Bina Sains Cemerlang was held by:</p> <ul style="list-style-type: none"> • Public Notification on website PT Mutuagung Lestari on July 5th, 2019. • Public consultation meeting with government institution in Musi Rawas District (Labor Agency, Plantation Agency & Environment Agency) on July 22nd, 2019. • Public consultation meeting with communities (Anyar & Muara Rengas Village) including previous land owner on July 23rd, 2019. • Public consultation meeting with internal stakeholders and contractor on July 23rd, 2019. • Public consultation with NGO (WALHI, Sawit Watch, AMAN & WWF) on July 12th, 2019. <p>Numbers of input from stakeholders were clarified by PT Bina Sains Cemerlang.</p>
2.3.2	Stakeholder contacted
	<i>Please find appendix 1</i>
2.4	Determining Next Assessment
ASA 1.2	The next visit ASA 1.3 will be determined eight (8) month to twelve (12) month after date of annual license (April to July - 2020).

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Sungai Pinang POM – PT Bina Sains Cemerlang, Sime Darby Bhd operation consisting of one (1) mill and two (2) oil palm estates.

During the assessment, there were nine (9) Nonconformities were assigned against Major Compliance Indicators, one (1) nonconformity were assigned against Minor raise to Major Compliance Indicators, four (4) nonconformities were assigned against Minor Compliance Indicators and one (1) opportunity for improvement were identified.

MUTUAGUNG LESTARI found that Sungai Pinang POM – PT Bina Sains Cemerlang, Sime Darby Bhd complied with the requirements of RSPO Principles & Criteria and National Interpretation, RSPO Principles and Criteria (P&C) for Sustainable Palm Oil Production, Republic of Indonesia - RSPO INA-NIWG, 30 September 2016. RSPO Supply Chain Certification Standard and System For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014, Revised on June 2017 (Module D for CPO Mill)

Therefore MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is continued.

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
PRINCIPLE #1 COMMITMENT TO TRANSPARENCY		
1.1	Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	
1.1.1.	The Company shows list of stakeholders for 2019 consists of Local government (22 stakeholders), Central Government (6 stakeholders), NGO (6 Stakeholders), Community Leaders (8 communities), Partner Contractors (21 Stakeholders), School (6 stakeholders), Hospitals, Insurance and Banking (7 stakeholders). The documents accessible to public or stakeholders can see at indicator 1.2.1.	
1.1.2.	The company has the SOP information request SPO / 001 / BSC / 2012 valid from 1 November 2012 in which the SOP explained that all requests for information addressed to the manager and then manager review the requisition to be made the response. Head of administration makes the draft of written response, then signed by the Unit Manager before sent to the parties, time of response is 3-15 days. The company shows documents requesting incoming letters and response letters to stakeholders for the period 2018 and January - July 2019 among others Letter from SMK Negeri 2 Tugumulyo Lubuk Linggau on April 16, 2019 regarding information on student internships. Management has responded to the incoming letter on April 28, 2019.	
	Status: Comply	
1.2	Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.	
1.2.1.	There are documents accessible to public or stakeholders PT BSC for 2019 and it's has been approved by estate & factory Manager such as: <ul style="list-style-type: none"> • Land Use Title • Plantation Business Permit • Agreements • Document HCV 	

- Document SIA
- Document Waste/application.
- EIA
- Environmental Management Plan / Environmental Monitoring Plan
- Guiding Committee of Occupational Safety & Health.
- Employee data
- Data FFB production
- Data production CPO and PK
- Data Hazardous Waste
- Specification plant machinery
- Specifications vehicle engine
- Document of sustainable plantation management guidelines.
- Human rights policy
- Non-discrimination policy.
- Prohibition of employing children.

Based on interview with internal (worker union & gender committees) and external stakeholders (government, previous land owners, villagers and contractors) sighted that they were aware about public documents of CH's.

Status: Comply

1.3

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

1.3.1

The Company has a policy No. 440 / HRM-COC / 07 dated May 24, 2007 about Code of Conduct, which aims to:

- Realizing the vision of company in a professional and ethical to draw attention to professionalism all stakeholders who ultimately towards the improvement of the reputation and image.
- Reduce the risk of conflicts of interest and lawsuits due to negligence committed by individual companies.

Based on interviews with contractor, harvesting employees, applicator pesticide, warehouse officers, labor union it's known they already know regarding the code of conduct policy.

Status: Comply

PRINCIPLE #2 COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS

2.1

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

2.1.1.

Environment Aspect

- Temporary Hazardous Waste Store license number 503/05/LB3/DPM-PTSP/V/2019 dated 31 May 2019, location: S: 03°08'06.1" and E: 103°07'05.5"; validity period: 5 year after this decision.
- Domestic Wastewater Discharge Permit number 503/04/IPAL/DPM-PTSP/IV/2019 dated 2 April 2019, location: (S 02°59'4.11"; E 103°24'22.63"); validity period: 5 year after this decision.
- The company has EIA document (AMDAL) covering 24,000 ha with mill capacity of 30 ton/hour. The document is legalized by Agribusiness Division of Agriculture Department no. No. 005/ANDAL/RKL-RPL/BA/X/94 dated 18 October 1994.
- The Revised Environmental Management Plan (RKL) and Environmental Monitoring Plan (RPL) of Plantation and Palm Oil Processing Plant have been approved by the Regent of Musi Rawas 128B / KPTS / IV / 2007 dated 30 October 2007. The estate area is 6,513 ha with 24,000 ha of reserve area, Capacity 30 to 60 Ton FFB/Hour.

Legality Aspects.

The company has a plantation business registration certificate on October 9, 2000 with an area of 6,513 ha for oil palm plantations located in Muara Lakit District, Musi Rawas Regency, and South Sumatra Province with a capacity of 30 tons

of FFB / Hour. Its *SPUP* has been covered all managed area 6,513 ha.

Based on Evidence Observed as :

1. Based on field observation to block I22 division 3 BPE found that there was one fertilizer who did not have a working agreement with the company.
 - Based on the interviews it was found out that the worker received half the wages from the *SKU* workers who were assisted (according to the agreement of both parties).
 - Based on the document review of the employee registration document and the *BKM* foreman the names of assisted workers are indeed not registered.
 - Law No. 13 of 2003 article 50 states that employment relations occur because of an employment agreement between the employer and the worker / laborer.
 - IOM Number 12 / BPE / VII / 2019 dated July 23 from the leadership of PT BSC (EM BPE, EM SPE, and EM SPF) about not being able to employ workers outside of *SKU* and contracts.
- Based on the employee list of Sungai Pinang Estate, Bukit Pinang Estate, and Sungai Pinang Factory it is known that the composition of the workforce is *SKU* and *PKWT*.
- Kepmen 100 of 2004 article 13 concerning *PKWT* registration states that *PKWT* must be recorded by the entrepreneur to the agency responsible for the local regency / city manpower no later than 7 (seven) days after signing.

Thus it can be concluded that the Company has not been able to show consistency in meeting relevant legal requirements such as Law No. 13 of 2003 and Kepmen No100 of 2004.

2.1.2.

The company has a legal requirement SOP (010 / BSC-PH / VIII / 10 dated 2 August 2010, Revised August 1st, 2016) which includes explaining about:

- The Legal Team and Manager are responsible for identifying, inventorying and evaluating the fulfillment of all legal requirements.
- The Legal Team and Manager make a summary of the rules.
- The Legal Team and Manager communicate a summary of the regulations
- The Legal Team and Manager monitor the application of regulations
- Regulations can be obtained and updated by contacting government, non-government agencies and visiting the web.

A copy of the regulation is in the Bukit Pinang Estate office. Copies of the regulations in the form of softcopy (complete) and for hardcopy (not all).

2.1.3 & 2.1.4.

Internal audits are conducted once a year by PSQM staff. There are a total of 143 regulations. The company has a mechanism for evaluating regulatory compliance. Evaluation is done periodically at least 6 months and in monthly meeting its fulfillment has been reviewed and evaluated. All regulations are noted in the list of rules which are always evaluated regularly at least once a year or if there are regulatory/latest requirements referenced by Legal Team. The Estate Manager is responsible to communicating the regulatory summary and monitoring of its implementation.

Status: Comply	
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2.2

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

2.2.1

Land ownership document showed in Decree of BPN No. 17/HGU/BPN/99 and HGU certificate No 7 date on 12 June 1999 valid until 11 June 2034, for an area of 6,513 Ha on behalf of PT Bina Sains Cemerlang. The transfer of rights and name changes to the name of PT Bina Sains Cemerlang was done on September 29, 2004, BPN registered no. DI.307, 1996/2004, based on notarial deed No. 3 dated October 2, 2000.

It was explained in the land use title decree, in the EIA and HCV assessment documents, it was stated that the land area of 6,513 Ha was state land, consisting of directly controlled by the state of 3,600 Ha; 2,188 Ha is a forest area that was released based on the Minister of Forestry Decree No 456 / Kpts-II / 90 dated 24 August 1990 (part of the area released was 10,600 Ha); and Minister of Forestry Decree No 36 / Kpts-II / 1998 covering 731 hectares on January 14th, 1998.

2.2.2.

Field observation in at boundary stone number 14 block K21 Division 03 BPE ; boundary stone number 15 block K18 Division 03 BPE, boundary stone number 17 block I09 Division 2 SPE, boundary stone 18 I010 Division 2 SPE, & boundary stone 19 block I06 Division 2 SPE it is known the boundary stones are in the good conditions and according with land use title. There is monitoring checking for boundary stones on March 1st, 2019 its inform existence, condition, cleanliness, color and number of boundary stones.

2.2.3, 2.2.4, 2.2.5 & 2.2.6.

The evidence of land compensation process has been verified in the previous assessment (initial assessment on first certification cycle until Re-certification), the entire compensation process was completed during 1990 - 2005. According to the document of land dispute monitoring, there was 6.20 Ha area that still occupy by community and still in progress of dispute resolution.

Letter from Lubuk Linggau Regional Secretariat dated April 26th, 2017 regarding the follow-up action settlement facilitated Sungai Pinang residents on behalf Waris Guding with PT Bina Sains Cemerlang. Based on meeting on April 13th, 2017 that the area claimed by the community was located at \pm 225 ha in the location permit granted at \pm 308 ha. At the meeting on March 5th, 2018, it was explained that the land claimed by residents was an area under the control of PT BSC whose licenses were obtained from the Government and had been compensated to 20 residents of Sungai Pinang on September 18th, 2019 covering an area of 224.94 ha witnessed by the Village Government & Sub-district.

Based on interviews with Muara Rengas Village and Anyar that currently there is no land conflict with PT BSC, all conflicts have been resolved through a court decision. It was stated that the company did not commit violence and hire paramilitaries in maintaining operational security.

Status: Comply

2.3

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

2.3.1; 2.3.2; 2.3.3; & 2.3.4.

Based on interviews with community leaders in Muara Rengas Village who was also a landowner and a member of the land acquisition team at the initial stage of land clearing, it was found during the audit there was no land conflict with PT BSC, all conflicts were resolved through a court decision. It also said that the company did not commit violence and hire paramilitaries in maintaining operational security.

The company shows a recapitulation of compensation for Sungai Pinang area from 1990 to 1999. For example: compensation on October 15, 1999 covering 203.5 ha and has been paid and signed by the Sungai Pinang village head, Head of Village of Anyar, PT Bina Sains Cemerlang and Head of Muara Lakitan District. There is maps area and names of landowners located in Sungai Pinang.

The results of interviews with Muara Rengas village, until now the compensation has been done voluntarily. All land compensation information is carried out in Indonesian and is recorded in the land compensation document.

Status: Comply

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

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

3.1.1; 3.1.2

The company has shown a long-term plan for the period 2019-2023 for PT BSC which includes management plan data such as the statement area (TM area, TBM, land clearing, arable land, reserve area, road, drainage, housing, trend oil extraction, cost production, price forecast, financial indicator and others).

The company has shown a document reviewing the 2018 PT BSC budget that reviews the evaluation of achievement

compared to the predetermined budget. The discussion includes a review of plant maintenance activities, harvesting, production and so on.

The company has recordings related to the replanting program (5-year projection). The record is listed in the MMCM document and a review is carried out by the management of PT BSC.

In addition, the company also has a PSQM (Plantation Sustainable Quality and Management) department that is responsible for ensuring optimum field performance and overseeing performance in accordance with applicable procedures. PSQM staff periodically monitor and inspect the field and the results of the inspection are subject to evaluation by management.

Status: Comply

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

4.1

Operating procedures are appropriately documented and consistently implemented and monitored.

4.1.1

The company has a plantation procedure in the form of a Reference SOP for the Agronomic Planting Manual for Palm Oil No. Policy; 110 / EST-ARM / 13 consisting of 18 chapters / sections on technical culture of oil palm cultivation was released based on Upstream Indonesia's plantation head memorandum on September 1, 2013. Beside that, the company has procedure of Palm Oil Processing System in the Palm Oil Mill Technical Guidelines consisting of the basics of oil palm processing, oil and palm kernel stockpiling, control of factory wastewater, water treatment and laboratory analysis and others.

Based on field visits and interviews with spray workers in Block I22 Division 3 Bukit Pinang Estate, it is known that workers understand the procedures related to manuring activities such as not manuring near water bodies.

4.1.2; 4.1.3

The company has a list of all procedures for mill and estate operations. The mechanism if there is a change in SOP must be submitted to the head plantation and then considered revising the SOP. The final revision of each SOP will be stored in each estate unit and mill.

The company has a company internal control system that aims to monitor operational implementation in accordance with the SOPs which are carried out, among others, by conducting internal RSPO audits every year, conducting internal audits of mill and estate operations including examining aspects of procedure / SOP implementation and administration as well as monitoring internal.

The company has personnel assigned to internal supervision to monitor the consistency of application procedures in the field, including Plantation Advisory, Mill Advisory and RSPO Internal Audit. The company has also routinely carried out inspections of plantation and factory operations.

Based on document review, it is known that the company has shown records related to internal audit results, among others conducted by Minamas Research Center (MRC), Plantation Advisory, Mill Advisory, GCAD (Group Corporate Assurance Department) and RSPO / ISPO Internal Audit. The company has shown a Replanting Work and Report Card document for Replanting activities in 2018 which includes reviewing the inspection of activities in accordance with standards including checking the quality of work, availability / completeness of PPE, consistency of PPE usage, availability of Operation Permit Letter, Inspection of Contractor's Residence, availability of health insurance BPJS and Employment, etc. The results of the field visit revealed that there were solar tanks and solar storage facilities in the traction housing (replanting contractors) that were not in accordance with the standards.

However, the company has not been able to show internal audit activities that review the examination or monitoring and evaluation according to procedures for all work involving third parties according to RSPO Standard. **This is become a minor non conformity No. 2019.02.**

4.1.4.

Sungai Pinang POM only processes FFB from its own plantation (core) and does not purchase FFB from other sources.

Minor

Status: Nonconformity No.2019.02 with minor category.

4.1.2	
4.2 Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.	
4.2.1; 4.2.2 <p>The company already has a Reference SOP for the Oil Palm Planting Manual No. Policy; 110 / EST-ARM / 13 consisting of 18 chapters / sections on technical culture of oil palm cultivation released based on Head Plantation Upstream Indonesia's memorandum (on September 1, 2013). There are guidelines for managing soil fertility, among others, from chapter 8 regarding fertilization and chapter 17 regarding LCC.</p> <p>Certificate holder (Bukit Pinang Estate and Sungai Pinang Estate) have shown of fertilization realization programs. The recording of fertilizers in Bukit Pinang Estate includes fertilization in Mei 2019 as many as 3.31 tons with a realization of 100% compared to the recommendations set.</p> <p>The company has shown data on the use of fertilizers per ton of FFB in 2017-2018 for Bukit Pinang Estate. The use of fertilizer per ton of FFB for the period 2018-2019 is 0.06 fertilizers/ton FFB.</p> <p>Based on field observations in Block I22 Division 3 of Bukit Pinang Estate, it is known that workers understand related fertilization procedures such as not fertilizing close to water bodies and fertilizing according to the recommended dosage.</p> 4.2.3 <p>The company has procedures for leaf analysis (SOP Leaf Sampling Unit No PM 0901 April 1, 2010 which aims that leaf analysis results are a key factor in determining recommended doses. In addition, the accuracy and accuracy of leaf analysis depends on how the correct leaf sampling is performed in the field, the procedure describes the procedures including the supply of tools and materials, determining the LSU block, sampling patterns and sending samples. The company has also indicated that the procedure for guiding sustainable plantation management No. 724 / TQEM-SPMS / 09 dated August 27, 2010 states that land checking is done every five (5) years to determine the nutrients contained in the soil.</p> <p>The company has shown proof of implementation in accordance with the SOP, among others, showing the report of the final leaf test results with the P108/2019 No Test Report dated July 16, 2019 and the last soil sampling taken in 2015.</p> <p>Based on documents verification of LSU/SSU and interview with workers it is known that leaf sampling, soil and visual monitoring activities are intended to be the basis for determining future recommendations and based on fertilizer requirements on each block.</p> 4.2.4 <p>The company has shown the Sungai Pinang Solid Waste Results (mill) recapitulation document in 2019. Based on these documents it is known that the company has used it as one of the ways to recycle nutrients such as:</p> <ul style="list-style-type: none"> - Application of boiler ash as much as 12.7 tons in January 2019. - Application of fiber for boiler as much as 438 tons in February 2019. - Application of shell for boiler as much as 235.11 tons in March 2019. <p>Based on the field visit to the replanting area in Block D11 Division 1 of Bukit Pinang Estate, it is known that the company has implemented nutrient recycling by utilizing the chipping results of oil palm plants to increase organic content in the soil.</p>	
	Status: Comply
4.3 Practices minimize and control erosion and degradation of soils.	
4.3.1; 4.3.4 and 4.3.5 <p>Based on documents of semi detail soil survey and Feasibility study 2015 – 2020 mentioned are the distribution maps of slope and fragile soil in the operational area with scale 1:50000. Semi detailed soil survey indicated type of soil in PT BSC are 4,779.9 Ha is moderately suitable, 1,562.5 Ha is Suitable and 132.10 Ha currently unsuitable. Based on semi detail</p>	

was not identified peat area.

4.3.2; 4.3.6

The company carried out replanting activities for hilly areas with a contour terrace system according to the procedures owned by Agronomy Reference Manual Section 4 Land preparation which explains the construction of terraces for certain slope areas (6 - 25%) and violle system planting systems for hilly areas.

The company has several strategies in managing certain slope areas, such as making silt pits, horse treads, terraces, frond stacking U-shape applications, planting nephrolepis. One effort to resist nutrients and prevent erosion is to make a contour terrace and plant LCC plants.

The company has shown documents on the Lean Area Management program at PT BSC for the period 2018-2019. The realization of the program included planting peasants, planting Nephrolepis biserrata, making terraces in the replanting area, implementing U-Shape, making Road Sidepit and Road Washing Sidepit.

Based on the results of field visits in Block H13, Division 1 of Sungai Pinang Estate, it was discovered that the company had made terraces, planted legumes / cover crops and carried out fringing at the edge of the terrace. This is the company's effort to retain nutrients and prevent erosion / runoff. In addition, the company has installed erosion stakes to monitor erosion rates with good stakes.

4.3.3

The company has shown the Road Maintenance Program document for 2019. The data includes the following:

- The road maintenance program (Upkeep Road) at Division 1, Sungai Pinang Estate in June 2019 is 8000 meters, the realization was carried out in June 2019 with 8000 meters (100% realization of the budget).
- The road maintenance program (Upkeep Road) at Division 3, Bukit Pinang Estate in June 2019 is 7200 meters long, the realization was carried out in June 2019 of 7200 meters (100% realization of the budget).

Based on the results of a field visit to Blok I002, Division 3 in Bukit Pinang Estate, it is known that the company has carried out road maintenance activities manually, in general the road conditions are in good condition and can be passed by TBS transport trucks.

Status: Comply	
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4.4

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

4.4.1.

The Company has identified the water sources contained in the HCV area identification documents and SEIA documents. The source of clean water for the community (washroom bath) is from rivers but for drinking water is obtained by making wells. In addition, the company has built water bodies to collect rainwater in low-lying areas as a source of water in the event of a long dry season, there are 24 water bodies in SPE and 14 water bodies in BPE, for example: Block D013, Division 1, BPE and Block I015, Division 1, SPE. In addition, the company has marked the application pesticide limit on the border of Pinang River. The CH's also conducted water quality test on the upstream and downstream of Pinang River and Durian River every semester. All the parameter were complies with the Government Regulation Number 82 year of 2011, for example: TSS in upstream Pinang River is 28.6 mg/L and Durian River is 25.8 mg/L (below of limit 50 mg/L).

4.4.2

The company has SOP for riparian area protection and SOU Memorandum no. The SOP covers the determination of riparian zone and its demarcation. Further, the company has a policy on steep and riparian area protection. The company has mapped the water bodies/river which crossing the company operational area in situation map with scale of 1:50000 covering Pinang River, Durian River, Slinsing River and Air Hitam River.

Based on field observation to riparian area in Sungai Pinang, Block F13 Sungai Pinang Estate, plant upkeep is manually conducted without chemical. There are also marking on palm oil stands as a border of no chemical application in riparian area and planting hardwood tree. The riparian is left over, no replanting activity on that site.

4.4.3.

The CH has six effluent ponds with total capacity of 43,200 m³. There are also Land Application permit number 436/KPTS/DLH/2017 dated 7 June 2017, it located ob Block F11 & F12 with area 83.64 Ha. The waste water volume and quality has monitor every month, for example on March 2019: Parameter BOD: 125 mg/l and volume: 2,703.85 m³. Based on field observation to the block F12, Division 1, SPE, there is no indication leakage on the flatbed.

4.4.4.

The CH has procedure water treatment plant regarding the process of water treatment for process and domestic. The water usage for FFB process budget is 1.5 m³/Ton FFB. Based on document verification sighted that average of water usage during period July 2018 to June 2019 is 1.22 m³/Ton FFB. It was below the water usage budget. Based on field observation to the Water Treatment Plant in the mill, it's known that there are three flow meter (inlet, domestic and process) on good condition.

Status: Comply

4.5

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

4.5.1; 4.5.2

The company has conduct biological control to reduce population of disease pests, such as planting and beneficial plant care to reduce nettle caterpillars, installation of BOB and monitoring of owls to reduce rat pest and installation of pheromone traps in blocks with sufficient horn beetle populations.

The company has shown a recording of the Integrated Control Pest Census Training activity held on 04 July 2019 and attended by 14 participants consisting of maintenance labor and head supervision.

Beside that, based on recapitulation of caterpillar and mouse pests in the period June 2019. Based on these results, it is known that there were no pest attacks at PT BSC. However, based on the results of interviews with census, it was found that potential pests during the replanting activity were Apogonia pests. Workers can also explain related detection mechanisms and censuses for pests and diseases such as determination of sample points, determination of pest types, and scale of pest attacks.

Based on pesticide use data for the 2018/2019 period, it is known that companies do not use warfarin. Pesticide reduction with warfarin active ingredients is 100% compared to the previous year. (The use of the 2016/2017 period is 350 kg and there is no use of warfarin in the 2017/2018 and 2018/2019 period).

Status: Comply

4.6

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

4.6.1; 4.6.2

Certificate holders have procedures in pesticide use activities contained in the Reference SOP of the Agronomic Planting Manual for Palm Oil No. Policy; 110 / EST-ARM / 13. In the plant maintenance section, crop protection and weed control explain the use of pesticides selectively according to the target and target weeds or pests in the field. The company has set a policy not to use Paraquat as contained in the memorandum from the Head Plantations Operation (number: POD-UM-127 / X / 2008, November 4, 2008) regarding Replacement Recommendations for the Application of Paraquat Active Materials in the Minamas.

The company has made efforts to avoid the development of resistance to weeds such as the use of different types of pesticides, regulation of spray rotation and spraying in accordance with selective weeding. In addition, the company has a document on the Monitoring of Pesticides and Chemical Material Toxicity at PT BSC. The document details the type of material used, registration number, control target, acute oral toxicity (oral LD50), dose/ha, LD50, active ingredient (%) and active ingredient / ha.

The company (Sungai Pinang Estate and Bukit Pinang Estate) has demonstrated the pesticide application program listed in the Minamas Management Committee Meeting document, while the plan for applying the pesticide includes:

- Weeding Circle activities (Immature Area) in Bukit Pinang Estate conducted in June 2019 have a program covering 1165 Ha with realization of 1871 Ha (over realization of 60%).
- Weeding Circle activities (Mature Area) conducted in Bukit Pinang Estate until June 2019 have a program covering 2666 Ha with the realization of 2959 Ha (over realization of 11%).

Based on field visits and interviews with spraying workers in Block G17 Division 2, Bukit Pinang Estate, it is known that labors have been spraying according to procedures such as not spraying near water bodies, having knowledge of the types of pesticides used, understanding the dosage used and capable of identifying the target weeds. Based on this, it can be concluded that the company can show procedures and implementation related to security in the use of chemicals.

4.6.3

The company has procedures for integrated pest and disease control in the form of Reference SOP for Agronomic Planting Manual for Palm Oil No. Policy; 110 / EST-ARM / 13 which among others explains plant protection. In the procedure, it was explained that the company implemented an Early Warning System (EWS) system, which did not carry out controls using preventive chemicals, but by routinely monitoring pests and diseases before taking control of pests and diseases using chemicals in the event of an attack.

The company has shown a document on Recapitulation of Pest and Disease Census in which it contains the realization of the implementation of detection activities and census of disease pests.

Based on realization of the caterpillar census, rat census, termites census and *Oryctes rhinoceros* census activities in June 2019 in PT BSC, there are no indication of pest attack, so no control is needed.

Based on the results of a field visit to Block D11 Division 1, Bukit Pinang Estate found that the company had implemented a *Tyto alba* box in an effort to increase predators of rat.

4.6.4

The company has set a policy not to use Paraquat as contained in the memorandum from the Head Plantations Operation (number: POD-UM-127 / X / 2008, November 4, 2008) regarding Replacement Recommendations for the Application of Paraquat active materials in the Minamas.

Certificate holder has shown the document Table of Use Chemist 2016-2019, it is known that there has been a decrease in pesticide use with Group IB (Warfarin), the last use of which was carried out in the period 2016-2017. \

Based on observations to the Sungai Pinang Estate and Bukit Pinang Estate chemical warehouses, it is known that there are no pesticides included in the WHO 1A and 1B list or listed in the Stockholm or Rotterdam Conventions.

4.6.5; 4.6.7

The company has procedures related to the Block Spraying System (PM 0800 Document Number April 1, 2017) which aims to control and suppress weed growth in the cultivated plant area. With a spraying system that is done by blocks per block with better quality of spraying, supervision is more focused and productivity is higher. In the procedure, it explains the stages of dissemination activities including health bodied, ban for children/pregnant women, use of PPE, areas that cannot be sprayed, spraying procedures and storage of work tools.

There were training activities for spraying workers, including training for 40 pesticide applicators (at Bukit Pinang Estate), that consisting of 12 women and 3 men in Sungai Pinang Estate and 25 pesticide applicators consisting of 2 men and 22 women in Bukit Pinang Estate. The company has provided special vehicles in the form of trucks to transport pesticides to the field. Pesticide transport vehicles also provide clean water, soap and first aid kits to support the sanitation and OHS aspects needed by the spray team.

Based on the results of observations and interviews on spraying activities at BPE (Block G17) and SPE (Block D6). The labor has understood the spray dose used such as spraying with the use of the active ingredient isopropyl amine glyphosate using a dose of 60 ml of chemicals for every 20 liters of water, beside that the company also give the facilities to hand washing for the labor.

4.6.6

The company has a SOP for Pesticide Packaging No RA 012 dated August 1, 2016, in the procedure explained about pesticide storage, namely:

- New packets entered are marked on the card showing the type, amount and date of purchase
- Pesticides must be stored in a safe place (locked warehouse), separate from fertilizers, food ingredients, and water sources
- Types of pesticides must be stored separately according to their respective groups
- Empty packaging of used pesticides must be returned to the estate warehouse for safekeeping

The results of the document review on the Use of Chemistry for 2017-2018 include the use of pesticides, among others:

- Use of pesticides with the active ingredient isopropyl amine glyphosate (July - August 2018) in Sungai Pinang Estate as many as 1,316 liters or as many as 65 cans
- Use of pesticides with active ingredient isopropyl amine glyphosate (June - August 2018) in Bukit Pinang Estate as many as 1,389 liters or as many as 69 cans.

Based of Monitoring Documents for the Recording of B3 Waste and Non-hazardous Waste for the period July - September 2018 are as follows:

- Recording of ex-packets of July 2018 herbicides (cans) in Sungai Pinang Estate as many as 0.0456 tons
- Recording of ex-packets of August 2018 herbicides (cans) in Sungai Pinang Estate as much as 0.04 tons
- Recording of ex-packets of herbicides (cans) in September 2018 in Sungai Pinang Estate as much as 0.04 tons
- Listing of ex-packets of herbicides (cans) in July 2018 in Bukit Pinang Estate as many as 0.001 tons
- Registration of ex-packaged herbicide (cans) in August 2018 in Bukit Pinang Estate is 0.01 tons
- The total recording is 0.1366 tons.

Based of hazardous waste management records documents (Log Book). It is known that 0.0333 tons of shipments have been made and the remaining hazardous warehouse stock is 0 tons.

The company has shown a document on the Use of Chemistry for 2017-2018, a document for Monitoring the Registration of hazardous waste and Non-Hazardous Waste as well as a Log Book. But there are still differences in the recording of 0.1036 tons. Regarding this, the company has not been able to show evidence that all pesticide containers have been managed appropriately in accordance with applicable regulations. **This becomes a non-conformity. 2018.03.**

4.6.8

Based on document studies and interviews with management, it is known that the company does not apply pesticides by the air.

4.6.9

Pesticide usage is applied by trained personnel which is in accordance with pesticide usage best practices Company already had MSDS (*Material Safety Data Sheet*) for each agrochemical substance (Pesticide) that describes handling and storage guidance, treatment when accident occurs (First Aid Measures), hazard identification, measures against spillage and leakage, personal protection equipment, physical and chemical characteristics, reactivity and stability, Toxicology information, Ecology information, waste disposal and transport.

Based on interviews with spraying workers in block G17 division 2 BPE and Block D6 Division III SPE (Total 12 people) revealed information on handling pesticides was routinely delivered at least every two weeks during the morning briefing

Examples of training records on handling pesticides include:

- Training on spray techniques and pesticide handling on May 10, 2019 at Block I22 Division 3 BPE, attended by all BSS members. The training covers how to handle poisoning and equipment calibration as well as spray area limits.
- Training on spray techniques and pesticide handling on May 09, 2019 at Block C5 division II SPR, attended by all BSS members. The training covers how to handle poisoning and equipment calibration as well as spray area limits.

4.6.10

There is SOP of Management hazardous waste and Nonhazardous waste (document of hazardous waste & hazardous material management No.Revision 00) dated March 4, 2016. There are manifest of hazardous waste on April 2, 2019 to PT Gema Putra Buana (party of collecting hazardous waste) with vehicle number B 9050 BYY with manifest number AAT

0026172 pesticides packaging amount of 0.8987 Ton.

Interview with residence and sprayers in housing in BPE and SPE showed that residents are prohibited and understood that used-pesticide packages cannot be used for other utilization apart from carry other poisonous material.

4.6.11

Based on the list of PT BSC employees, it is known that the number of pesticide applicators per July 2019 is 47 people for SPE and 33 people for BPE. After major verification was conducted on 05-07 August 2019, it was known that the actual number of pesticide applicators was 15 people for BPE and 20 people for SPE.

Medical Checkup for pesticide applicators are routinely carried out every six months and have been carried out for all the names on the applicator's list. The last Medical Checkup was held in June 2019 with the following results:

- SPE: 3 people diagnosed with pesticide poisoning; doctor's recommendation is not to use chemicals for two months
- SPE : 2 people diagnosed with pesticide poisoning; doctor's recommendation is not to use chemicals for two months

There was a letter dated July 17, No. 207 / BSC / Sgr-SPE / VII / 2019 from the SPE Estate Manager and IOM on July 1, 2019 from the BPE Division II Assistant regarding job transfers for employees according to the doctor's recommendations. Based on the spraying *BKM* on 23 and 24 July the names of employees who recommended moving jobs were not registered as BSS members.

Based on interview with pesticide applicator in block G17 division 2 SPE known although not delivered in detail worker have gained knowledge about the result of routine medical check-up. The worker said that if there were indications of poisoning and were not allowed to make contact with pesticides, it would be transferred to non-agrochemical work. Pesticide applicator wear uniform (long sleeves and long pants) to minimize contact with pesticides. There were no complaints of irritation and itching on the skin from the applicator

4.6.12

The company has a policy prohibiting pregnant or breastfeeding women from working as spraying worker. The policy has been written down and installed in the form of warning as seen in the housing of Pondok II Division II BPE and CHC SPE.

In addition, based on the interviews with the BPE and SPE BSS team, it is known that both the foreman and the worker have understood the policy. Based on the BSS list of workers, it is known that the composition of the actual spray workers dated August 7, 2019 is as follows:

- SPE : 15 worker → All member is female
- BPE : 20 worker → 18 female and 2 male

Identification of pregnant and breastfeeding mom is done through monitoring H-1 and H-2 leave. Based on the field visit to the clinic revealed that the monitoring activities had been carried out well, for example on March 14 and 15, 2019 Suparti, Nurbati, Mudarokah, and Ukala were take H-1 leave.

Status: Comply

4.7

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

4.7.1

The company has a OHS policy that was approved by the CEO of Minamas Plantation on April 1, 2013 in the Sustainable Plantation Management Guide No. Policy 724 / TQEM-SPMS / 09, which states that Simedarby Plantation Upstream Indonesia is committed to effective OHS improvement.

One of the plans and commitments in the implementation of occupational health and safety is the establishment of an Occupational Health and Safety Advisory Committee for each management unit. PT BSC *P2K3* team work program has been demonstrated for 2019 which includes a safety briefing with a period every day, an emergency simulation every 3 months, a regular medical checkup every six months, and a *P2K3* meeting every month

The realization of the program include PT BSC Safety town hall 8.0 on February 19, 2019. The material presented in the form of health and safety in the workplace, simulations of the use of *APAR*, OHS Awareness in daily work and

understanding of emergency response situations. The effectiveness of the work health and safety plan is monitored through the monthly *P2K3* team meeting for each PT BSC management unit. The results of the monthly meeting are then summarized and sent every 3 months to the Related Agency. The *P2K3* team provides recommendations for raising awareness and OHS implementation in the workplace.

4.7.2

Based on observed evidence as :

- SPE work accident report found out that in March 2019 there was a work accident that exposed to stones when doing grass cutting with a machine. The category of accidents is 5 (accidents that involve hospitalization). Missing work hours are 54 hours.
- Quarterly SPE *P2K3* report 1 (January - March 2019) states that work accidents in the January - March 2019 period are Zero - There has not been any discussion and evaluation of work accidents in mowing cutting grass with machine
- The May 2019 SPE and BPE HIRAC documents on the grass cutting section have not analyzed the risk of eye injury and control.

Thus it can be concluded that HIRAC owned by the company has not fully accommodated the evaluation results of workplace accidents. This is a **Nonconformity No.2019.03**.

4.7.3

1. Based on the document review, field observation, and interview with worker found following facts :

- The company already has the Personal Protective Equipment SOP No. 10 / BSC-PSQM-ESH / 16 dated July 1, 2017, point 3.4. Investigation of PPE replacement stating "PPE that is damaged before the age of use will be replaced if an investigation has been carried out".
- Corrective action of non-conformity in the previous assessment stated monitoring of the use of PPE and PPE Conditions every month by the OHS Expert. The company has shown a checklist of personal protective equipment for BPE and SPF that explains the condition and completeness of PPE. The examination results in June 2019 showed that for BPE there were some damaged PPE but not followed up, while for the SPF it showed that all PPE were in good condition.
- The company has shown records of PPE granting for workers such as masks, goggles, aprons, boots and gloves for the spray team as well as the SPE and BPE fertilizer team for the 2018 period conducted in June. In addition, there was also a handover of shoes (safety krisbow) for all SPF employees for the 2019 period conducted in January.
- Field visits in Block I022 division III BPE showed that fertilizer worker boots were not provided by the company and the apron was torn. Interviews with workers revealed that there was no PPE storage area so they were taken home.
- Field visits on Block E07 SPE show that the boots used are private property because the rations from the company have been damaged
- Based on field visit at the SPF Engine Room station shows that the safety shoes used are in a damaged condition (the footprint is broke).
- Based on field observation to the SPF Kernel Station showed that workers brought ear muffs but were not used, the safety shoes that were used in the tread section were damaged and were private procurement (ration of the safety boots provided by the company was stored).
- Based on field visit to the BPE BSS and BMS house obtained information from the responsible BSS that the number of workers who entered on that day numbered 10 people while 2 others did not enter. Of the 12 available lockers, 10 lockers containing clean clothes 1 empty locker and 1 other containing uniforms and masks (PPE workers who do not enter are not stored in the BSS locker).

- Based on field observation to SPE BSS and BMS house obtained information that five spraying workers were absent. The only PPE that is stored are aprons and plastic gloves, while no other PPE is found such as masks, boots, and glasses.
- 2. Based on the document review, field visits and interviews related to the operator's license are known that:
 - Corrective action (non-conformity) in the previous assessment states that the General OHS Expert in each unit will monitor the validity period of the SIO. The determination of the operator's position at each station will be adjusted to the capabilities and competencies, referring to the data from the monitoring results of the operator license validity period.
 - SPF has not monitored yet license for engine room operator.
 - Based on interview with the engine room operator known it has never been attend OHS training.
 - Minister of Manpower Regulation number 38 of 2016 concerning Power and Production Machine states :
Article 110: Operation of Power and Production Machine is carried out by OHS operators in the field of Power and Production Machine.
Article 111: OHS operators include first movers, machine tool and production operators; furnace operator
Article 113: Initial driving operators include combustion motor operators, steam turbines, water turbines, gas turbines and windmills.

It can be concluded :

1. The company has not been able to show evaluations and ensure the effectiveness of the corrective actions in the prior assessment so that inconsistencies in the implementation of the occupational health and safety program are still found.
2. The company has not been able to ensure the effectiveness of corrective actions in the previous assessment so that not all operators that are required to be equipped with a license have been identified. It become **nonconformity No.2019.04.**

4.7.4

The person in charge for OHS implementing in PT BSC is OHS Committee where each management unit has its own structure. The entire OHS Committee of PT BSC has been authorized by the authorities. For example, the Decree of the Head of the South Sumatra Province Manpower and Transmigration Office Number: 04 / KPTS / NAKERTRANS / 2019 concerning the ratification of the management of occupational safety and health (*P2K3*) of PT Bina Sains Cemerlang Bukit Pinang Estate on July 22, 2019. The Secretary is Marimin (OHS Expert certificate No. reg. 9923 / PK3 / AJ / 31/2016 / P1 and *SKP* No. Kep. P. 3034 / NAKER-BINWASK3 / X / 2016 dated October 24, 2016.

Periodic meetings are held to discuss Occupational Health and Safety issues, for example the *P2K3* meeting minutes on January 11, 2019 at Sungai Pinang Estate, which discusses fire anticipation, environmental cleanliness and harvest PPE supplies and at Bukit Pinang Estate, which discusses environmental cleanliness and PPE discipline.

4.7.5

The company has procedures for handling work accidents and Emergency Response, including:

- SOP Preparedness; response; and recovery.
- SOP Fire Prevention and Management.
- SOP Work Accident Management.
- SOP of Earthquake.

There was a work accident investigation by the name Maliki on March 22, 2019, his eye was hit by a stone during maintenance activities cutting grass with a machine. Phase I and Phase II work reports have been conducted to *BPJS Ketenagakerjaan* on March 23, 2019. Records of work accidents are recorded in monthly reports; *P2K3* report; and recapitulated by PSQM staff. In addition, the company also monitors the contents of the first aid kit every month. SPF has 3 points while for SPE and BPE first aid bags have been given to all foremen in each activity. In addition, first aid boxes are provided at the division offices, BSS houses, and Schools, and Child Care Facilities.

There is a Decree on Assigning first aid check box on 02 July 2018 to Pujiono, with the main task of checking the

completeness and availability of boxes and contents of first aid boxes in good condition. While the first aid kit in the SPF process office was also found in good condition.

Based on interviews with engine room operators in SPF, and pesticide applicator in block G17 division 2 SPE known that worker have understood about emergency response procedures at least in prevention and handling of land fires. Worker said that regular socialization had been done at least once a month in muster morning. If the employee knew there was a fire incident it will report to the emergency response team.

4.7.6

All company's employees have been covered in health services and employment insurance (including accident insurance) in collaboration with PT BPJS. Evidence of membership and activeness can be shown in the form of monthly dues payment receipt, for example :

BPE

- *BPJS Kesehatan SKU-H and SKU-B* June 2019 period for 332 employees was paid through BRI on July 25, 2019
- *BPJS Ketenagakerjaan PKWT* period of June 2019 for 79 worker paid through BRI on July 25, 2019
- *BPJS Ketenagakerjaan the June period* for 332 SKU-H and SKU-B worker paid through BRI on July 25, 2019

SPF

- *BPJS Ketenagakerjaan SKU-H and SKU-B* for June period 2019 for 78 worker with proof of payment in the form of receipt of payment from *BPJS* with code 190505323231
- *BPJS Ketenagakerjaan* for 10 *PKWT* employees for the period June 2019 with proof of payment in the form of receipt of payment from *BPJS* with code 190505323384
- *BPJS Kesehatan* for *PKWT* employees and *SKU* through Bank Mandiri according to Bilyet giro No GGM162209

Based on interviews with harvesters in blocks C5 and C6 SPE as well as the BPE manuring team in block I22 it is known that employees have been included in the *BPJS Kesehatan* and *BPJS Ketenagakerjaan* programs. However, in ASA-1.1 this indicator becomes a nonconformity. The auditor verification results are as follows:

Verification on December 6, 2019.

The company shows evidence of improvement as follows:

1. SPK No 013/Potong Rumpu/BSC-SPF/VI/2018 June 5, 2018 with Recu Ricardo for lawn mowing work in the factory area and staff housing. Article 7 paragraph (3) explains that the contractor is obliged to register its members in the *BPJS Ketenagakerjaan* and *BPJS Kesehatan*.
2. Proof of payment of the *BPJS Ketenagakerjaan* through a virtual account for 1 person through a bank dated 29 November 2018.
3. Proof of payment of the *BPJS Ketenagakerjaan* through a virtual account for 4 people through a bank dated November 29, 2018.

Auditor Conclusion:

There is no evidence that all contractor workers have been protected by occupational accident insurance and occupational health insurance.

Verification December 17, 2018

The company shows some evidence of improvement, such as:

1. Proof of payment of *BPJS Kesehatan* for 4 people (name Toni Hidayat, Mita Deskaryani, Wahyu Dwi Setiawan, Ilham Tri Saputra) with payment code: 8888802619734567 dated 17 December 2018.
2. Inter Office Mail from the Manager of PT BSC to all Contractors No. 001 / SPK Contractor / XII / 2018 dated December 17, 2018, Subject: Clausal *SPK* Registration of Workers The contractor is a participant in *BPJS Kesehatan* and *BPJS Ketenagakerjaan*. There are 4 main points:
 - a. Addition of *SPK* article regarding the registration of contractor labor to become a member of the *BPJS Kesehatan* and *Ketenagakerjaan*
 - b. Report all workers without exception so that employment and health insurance can be obtained by workers.

- c. Proof of deposit of the *BPJS Kesehatan* and *Ketenagakerjaan* must be reported to the company where the employment contract is signed to ensure that the contractor has registered the workforce.
- d. If this deposit slip is not handed over to the company, the SPK that has been jointly signed is legally null and void.

Auditor Conclusion :

Please show the registration and payment records of the *BPJS Kesehatan* and *Ketenagakerjaan* for each contractor worker at SPE, BPE and SPF (other than the lawn mowing contractor at Mill).

Verification on July 24, 2019

The company provides additional evidence in the form of:

1. Work agreement letter No.003 / Replanting / BSC / VI / 2018 dated June 29, 2018 between PT BSC and PT Mitra Karya Jaya Perdana in article 9 regarding insurance, among others, states that *BPJS Ketenagakerjaan* of workers is the burden of the second party entirely.
2. Details of PT MKJP labor contributions for the July 2019 reporting period for 16 PT MKJP workers - there is no proof of payment for the details of the contributions.
3. Evidence of *BPJS Kesehatan* paying named Reza Firdaus in July 2019 (One of the employees of PT MKJP)

Based on the interviews with one of the PT MKJP representatives, it is known that the total number of workers is 25 people. The results of interviews with the head of Muara Rengas Village, there are citizens who become one of the contractors for the EFB application.

The company has not been able to show:

1. Identification of all contractors working with PT BSC (SPE, SPF, BPE) along with a list of all contractor workers.
2. Records of *BPJS Kesehatan* and *Ketenagakerjaan* registration and payment for each contractor employee at SPE, BPE and SPF.

Therefore, non-conformity No.2018.05 is declared not fulfilled with the minor raised to major status.

4.7.7

The PSQM team pointed out the Sumatra Accident for the period 2017-2018 and January - December 2019. In the document the work accidents recap is as follows:

2017 - 2018

- SPE : 4 case → LTI : 12 → FR : 4 ; SR : 13
- BPE : 8 case → LTI : 27 → FR : 9; SR : 29
- SPF : Zero Accident

January – June 2019

- SPE : 3 case → LTI : 12 → FR : 7; SR : 27
- BPE : 1 case → LTI : 5 → FR : 2; SR : 10
- SPF : Zero Accident

Major 4.7.2 Major 4.7.3 Minor raised to Major 4.7.6	Status: Nonconformity No.2019.03 with Major Category. Nonconformity No.2018.04 with Minor raised to Major. Nonconformity No.2019.04 with Major Recurring.	
4.8		

All staff, workers, smallholders and contractors are appropriately trained.
4.8.1 & 4.8.2

The company demonstrated the 2019 Human Resources Training and Development program including the SCCS training for employees and contractors planned for July 2019. While the BPE and SPE plan training and simulation emergencies every 3 months. There is also an RSPO PnC awareness plan for SPF, BPE, and SPE which is planned to be implemented at the end of 2019 with the implementation of the PSQM team.

Realization of training

- SCCS on July 18, 2019 was attended by 19 participants from representatives of employees and contractors. The guest speaker is PSQM-ESH
- OHS socialization on February 19, 2019 was attended by 16 representatives of employees and foremen and representatives of contractors. The guest speaker is the SPF Assistant assisted by PSQM-ESH
- OHS in the electricity sector, K3 welder, K3 in the field of lift and transport aircraft, and K3 in the field of steam aircraft in December 2018, January 2019, and March 2019. The organizer is PT Arpindo Pratama
- Safety town hall 8.0 PT BSC with details of the participants as follows
 BPE: 7 staff; 370 Employees; Contractors: 5 people
 SPE: 4 staff; 327 Employees ; Contractors: 4 people
 SPF: 7 staff; 79 employees; Contractors: 3 people

The material presented in the form of health and safety in the workplace, simulations of the use of Fire Extinguisher, OHS Awareness in daily work and understanding of emergency response situations. The programmed training involved the contractor and heeded the RSPO principles and criteria.

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

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

5.1.1

The company has EIA document (AMDAL) covering 24,000 ha with mill capacity of 30 ton/hour. The document is legalized by Agribusiness Division of Agriculture Department no. No. 005/ANDAL/RKL-RPL/BA/X/94 dated 18 October 1994. The study include impact analysis on air quality reduction, soil fertility, erosion and sedimentation, water quality, change in vegetation cover and wildlife disturbance, community recklessness, job opportunity and the development of local business and income.

The Revised Environmental Management Plan (RKL) and Environmental Monitoring Plan (RPL) of Plantation and Palm Oil Processing Plant have been approved by the Regent of Musi Rawas 128B / KPTS / IV / 2007 dated 30 October 2007. The estate area is 6,513 ha with 24,000 ha of reserve area, Capacity 30 to 60 Ton FFB/Hour. In addition, this document was created by the Centre for Environmental Research Institute, Sriwijaya University. The team of Amdal Ir. H.M Idris Naning (Team Leader, AMDAL 1 & B). Social and Environmental Impact Assessment for replanting activities of PT Bina Sains Cemerlang for 2015-2018 covering 1,774.23 ha consists of 865.90 ha (Bukit Pinang Estate) and 908.33 ha (Sungai Pinang Estate).

5.1.2 & 5.1.3.

There are environmental management and monitoring plans for plantation development activities and palm oil processing of PT Bina Sains Cemerlang include: Public perception, Flora and fauna, Water quality and Aquatic Biota. The implementation of management and monitoring plan is accordance with environmental document and related with regulation.

The company has been review monitoring environmental management plans and environmental monitoring plan every 6 months and it's has been reported to Environmental Agency. For example: RKL/RPL report period of Semester II (2018) was reported on 29 March 2019. Based on interview with communities from Anyar Village and Muara Rengas Village

sighted that there are no environment pollution issues from estates and mill operational during last year.

Status: Comply

5.2

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

5.2.1

The company has identified HCV area within its operational area. The identification was conducted by independent consultant of CV POLLITO. The HCV area present in PT BSC are HCV 1.1; HCV 4.1 and HCV 5 in form of riparian area of Pinang River, Durian River, Selinsing River and Air Hitam River for 492 ha that is included in the plantation area (potential HCV Area). The river border area that has been settled into the HCV area of 44.07 ha and is not in the planting area statement

The identified RTE of wildlife species are *Felidae*, *Hylobatidae*, *Ursidae*, *Manidae*, *Hytridae*, *Cercopithecidae*, *Viverridae*, *Bufonidae*, *Macaca nemestrina*, *Alcedo atthis*, *Anthreptes malacensis*, *Chloropsis sonnerati*, *Ictinaetus malayanensis*, *Varanus nebulosus*, and *Naja sp* and RTE species of vegetation species are *Ficus fistulosa*, *Picus*, *Rhodamnia cinerea* and seedling of *Aglaia tomentosa*.

5.2.2

In accordance with the identified RTE species in PT BSC operational area, the company has developed HCV management plan to protect the species. The related program are the development of flora and fauna protection procedure, monitoring on HCV area and RTE species and socialization of HCV and RTE species protection. However, the management plan shall include target and PIC. Management HCV are done in the form of installation of signs. Delineate and map the boundaries of the HCV area and perform HCV boundary markers by giving red paint on the palm stand and the installation of HCV signboard. It aims to avoid disruption to HCV areas. Based on field visit at Pinang River at block G19 know at the river buffer zone there was any sign board and several plant was planted by the company. The company does not undertake replanting activities in the area defined as HCV.

5.2.3

PT BSC programs regular education for the worker and has a policy on harm, capture, hunt or kill RTE species. The regular education on HCV and RTE species to the worker can be found in company HCV management plan and the policy of RTE protection is in form of Internal Memorandum of SOU 22 dated 3 August 2015. The policy has referred to the applied national regulation on protected species. The Company also puts a signboard in the HCV area regarding the prohibition of protected wildlife hunting and sanctions if it violates the applicable laws. Examples of HCV socialization of protected species and plants and the prohibition of animal hunting among others

- May, 11 2019. Socialization to Surrounding village by sending written letters to surrounding villages regarding prohibitions on hunting and the importance of HCV areas
- April, 15 2009 held at Sungai Pinang Estate. Socialization activities to the workers.

Based on field visit to the housing complex of Division I Sungai Pinang Estate there is no found any employees who capture and keep protected wildlife.

Based on interview with workers it was known that the labor had understood the types of animals protected. In addition, the labor also explained that socialization related to RTE species was carried out during the morning briefing.

5.2.4.

The certification unit shows the HCV management and monitoring program as follows:

- Don't do the overthrow of the principal within 50 meter and tagging of yellow paint.
- Installation of boundary stakes with a distance of 50 meter.
- Installation of notification and prohibition signboard for hunting and cutting in the buffer zone area.
- Planting tree or bamboo seedling in accordance with recommendation of HCV identification documents.
- Wildlife monitoring and plants monitoring every semester.

There has been realized from above programs, such as:

- Installing a signboard of prohibition spraying on riparian zone.
- Planting and rehabilitating the riparian zone of Pinang River, Hitam River, and Durian River.
- Routinely patrols has been conducted every month
- Wildlife and plants monitoring every semester.

However there are no evaluation and follow up of the results of RTE species monitoring result, as recommendation of next management plan. **It was raised as Non conformity No 2019.05 with minor category.**

5.2.5

Based on interview with the villagers and community figures of Muara Rengas and Anyar Villages is informed that there is no HCV area containing local rights. And based on HCV map and company operational area map seen that all HCV area is in company HGU area. Based on presented evidence and the actual condition during the field visit, the company has complied with criterion 5.2 on HCV identification and its management.

**Minor
5.2.4**

Status: Non conformity No 2019.05 with minor category.

5.3

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

5.3.1.

Identification of waste and pollution sources in Sungai Pinang Factory for 2019 include:

- Boiler Station: SO₂, NO₂, HCL, NH₃, HF (Pollution) and solid waste ash.
- Genset Station: SO₂, NO₂ and CO (Pollution) and Battery Used; Oil filters, diesel and oil filters.
- Waste liquid (WWTP): Ammonia (NH₃), CH₄, and CO₂.
- Factory operations: worker gloves, cloth rags.

In addition, the identified waste and pollution source in estate are manuring activity, clinic, workshop, spraying activity, office, warehouse and housing complex, generator use and transportation.

In the document of waste and pollution identification has been describe the plans to avoid or reduce the pollution. For example: liquid waste generated from mill managed in the WWTP to reduce the BOD and conduct the quality test in monthly basis and then applied to plantation area.

5.3.2.

The CH has Temporary Hazardous Waste Store license number 503/05/LB3/DPM-PTSP/V/2019 dated 31 May 2019, location: S: 03°08'06.1" and E: 103°07'05.5"; validity period: 5 year after this decision. There are manifest of hazardous waste on April 2, 2019 to PT Gema Putra Buana (party of collecting hazardous waste) with vehicle number B 9050 BYY, for example manifest number AAT 0026172 pesticides packaging amount of 0.8987 Ton; AAT 0026169: used oil amount of 0.6570 Ton; and AAT 0026170: used battery amount of 0.070 Ton.

Based on field observations, sighted several fact as follows:

1. There is the use of oil drums and used chemical container as water containers in several housing complex (Division two BPE).
2. There are 20 damaged knapsacks placed in the BMS house of SPE and one damage knapsack placed in the BSS House of BPE.

However the certification unit has not been able to demonstrate that all chemicals and their empty containers well manage in accordance to national regulations. **It was raised as Non Conformity Number 2019.06 with Major Category.**

5.3.3.

1. Based on SOP-BSC/07/2019 dated 1 July 2019 regarding waste management, including: garbage been that has been collected in the trash bin will be transported at least once a week, or twice a week by the transport to the landfill. Landfill is located far from water sources, its minimum > 500 meters from housing. There also not allowed to burn the housing waste, it is not justified to litter.
2. Based on field observations result to the landfill at block E07, Division 3, SPE known that the condition of the garbage is not dumped in the landfill (open dumping).

3. Based on document verification known that the infectious waste (medical waste) was carried out on 12 September 2018, with total 0.0095 MT. Where the shelf life of infectious waste on hazardous waste has exceeded 180 days, it's not in accordance to Government Regulation number 101 of 2014 article 28. Otherwise, based on field visit to the hazardous waste at SPF known that from 13 September 2018 till 18 July 2019, there were 0.0008 MT of medical waste.

However, the certification unit has not been able to show evidence that the waste management plan has been implemented in accordance to the procedure. **It was raised as nonconformity No 2019.07 with minor category.**

Minor 5.3.3	Status: Nonconformity No 2019.07 with minor category.	
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5.4 Efficiency of fossil fuel use and the use of renewable energy is optimised.

5.4.1
The Company has utilized Shells and Fiber as boiler fuel for turbines and analyzed for efficiency each month. Efforts to improve the efficiency of fossil fuels are put in SOP document of non-hazardous solid waste utilization in the form of shell and fiber as fuel of boiler to replace diesel fuel. As proof of implementation, available document monitoring the use of renewable energy source form of shell and fiber in PT BSC. The used of renewable energy is 0.06 kwh/ton CPO.

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

5.5.1; 5.5.2
The company has demonstrated the procedure for Reference to the Oil Palm Planting Manual No. Policy; 110 / EST-ARM/13 Upstream Indonesia plantation head memorandum on the September 1, 2013 replanting. In the procedure, it was explained that land clearing or replanting was not done by the burning method.

Based on the results of field observations to the D11 Division 1 Bukit Pinang Estate block, it was found that there was no indication of replanting activities using the burn method, the company carried out replanting activities by means of chipping.

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

5.6.1.
Identification of waste and pollution sources in Sungai Pinang Factory for 2019 include:

- Boiler Station: SO₂, NO₂, HCL, NH₃, HF (Pollution) and solid waste ash.
- Generator Station: SO₂, NO₂ and CO (Pollution) and Battery Used; Oil filters, diesel and oil filters.
- Waste liquid (WWTP): Ammonia (NH₃), CH₄, and CO₂.
- Factory operations: worker gloves, cloth rags.

In addition, the identified waste and pollution source in estate are manuring activity, clinic, workshop, spraying activity, office, warehouse and housing complex, generator use and transportation.

5.6.2.
The Company shows plans to reduce or minimize GHG emissions for 2019, such as

GHG Sources	Reduction efforts
Land Clearing	The application of zero burning in the land clearing process by tumbling minced method and CECT.
	Conducting cover crop such as LCC.
	Reforestation or re-planting of buffer zone and HCV areas

Use of pesticides	Reduce pesticide use by developing biological control for pest such as beneficial plan, Barn Owl Box (BOB) and selective weeding.
Application of fertilizer	Conducting FFB as fertilizer alternative to reduce the amount of inorganic fertilizer.
Emissions from vehicles	Restrict the speed of motor vehicles in the estate, conduct routine vehicle maintenance, and ensure all roads are in good condition with a road maintenance program.

5.6.3.

The Company show calculations Palm GHG Version 3.0.1 for 2018 year include:

Production

Production	t/yr
FFB processed	74,064.37
CPO Production	15,640.42
PK Production	3,393.80

Milling Extraction Rate

Extraction	%
OER	21.12
KER	4.58

Summary of Net GHG Emissions

Emissions per Product	tCO₂e/tProduct
CPO	2.33
PK	2.33

Land use	ha
OP Planted area	6154.42
OP planted on peat	0
Conservation (forested)	72.29

Summary of Mill Emissions and Credits

	tCO₂e	tCO₂e/tFFB
Emissions		
POME	12,041.4	0.16
Fuel consumption	922.81	0.01
Grid electricity	0	0
Credits		
Export of grid electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	12,964.21	0.18

Summary of field emissions and sinks

	Own Crop			Group		3 rd Party	
	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e/t FFB	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e	tCO ₂ e/ha
Emissions Source							

Land conversion	51,605.28	8.39	0.7	-	-	-	-
*CO2 Emissions fertiliser	23,613.49	3.84	0.32	-	-	-	-
**N2O Emissions	3,773.16	0.61	0.05	-	-	-	-
Fuel Consumption	1,977.33	0.32	0.03	-	-	-	-
Peat Oxidation	0	0	0	-	-	-	-
Sinks				-	-	-	-
Crop sequestration	-48,914.96	-7.95	-0.66	-	-	-	-
Conservation Sequestration	-662.9	-0.11	-0.01	-	-	-	-
Total	31,391.4	5.1	0.42	-	-	-	-

Palm oil Mill Effluent (POME) Treatment

Divert to compost	%
Divert to anaerobic digestion	100%

POME Diverted to Anaerobic Digestion

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

Palm GHG Calculation Options Using Apply Full Version.

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

The mill has monitored emission regularly per 6 months, the result are reported in RKL/RPL report. Based on interview with management representative mentioned that the mill has been installed the Ringleman Smoke Observation Chart.

Status: Comply	
PRINCIPLE #6 Responsible consideration of employees and of individuals and communities affected by growers and mills	
6.1 Aspects of plantation and mill management, including replanting, that have social impacts are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate the continuous improvement.	
6.1.1; 6.1.2; 6.1.3; 6.1.4 & 6.1.5. PT BSC has conducted a social impact assessment of oil palm plantation management in July 2011 conducted by CV POLLITO. The report about the involvement of which contain the public to ask for input related to environmental and social aspects of society. Communities involved include (documented in the public hearing event attendance list): Forest Agency,	

Environment Agency, Plantation Agency, Social Agency, local NGOs, Community Leaders, Customary Leaders, Youth Groups, etc. The form of stakeholder involvement is carried out through discussions, interviews, field checking and telephone contacts.

The form of stakeholder involvement is through discussions and interviews. There is recorded evidence in the form of the attendance list of activities public hearing on January 6th, 2010. The event was attended among others by: Community leaders, customary leaders, youth groups, Forest Agency, Environmental Agency, Agriculture Agency, Social Agency, local NGOs, and other.

The company shows the social impact management and monitoring program for the 2019-2020 period, example:

Potential impacts	Management	Time
Conflicts over ownership of land resources such as: <ul style="list-style-type: none"> • Border dispute. • Change and extension of land permits. • The process of licensing land ownership that is still under management 	<ul style="list-style-type: none"> • Maintenance of boundary stakes maintenance area • Update on the management of land permits that have been owned according to the validity period. • Fulfillment of permits related to land ownership in accordance with applicable regulatory mechanisms. 	Monthly During the term According to regulations

The coordinator of unit management social team is the Public Service Department (PSD) Manager. Evidence of a social impact assessment questionnaire at PT BSC, for example in the new Semanggus Village for the 2019 period.

The company shows the evaluation of social impact management for the 2017-2018 period so it is recognized that the need to do social impact management that includes social impact management programs does not include conflict management such as: land ownership conflicts related to licensing, land area boundaries, environmental impacts on Mill and Plantation operations, resources nature in estates, management of smallholders plantations, disturbance of land security. It is necessary to reduce the social impacts arising in the operation of the company (Estate & Mill). The follow up has been added to the social impact management and monitoring plan for the 2019-2020 period. The company is currently in the process of developing plasma for the surrounding village communities.

There is difference between social management plan in 2016/2017 and 2018/2019 example :

Conflicts over ownership of land resources such as:

- Border dispute.
- Change and extension of land permits.
- The process of licensing land ownership that is still under management

The positive and negative issues has been covered in the SIA Management Plan for 2018/2019. Based on interview with Anyar and Muara Rengas Village and implementation of social management. The company has been follow up the effectiveness of Social management plan for 2019-2020 example:

- The company is currently in the process of developing plasma for the surrounding village communities.

Status: Comply

6.2

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

6.2.1

The company shows a list of stakeholders in 2019 consisting of:

- Local government (22 stakeholders).
- Central Government (6 stakeholders)
- NGO (6 Stakeholders)
- Community Leaders (8 community leaders, among others: Rengas Community; Sungai Pinang Community; Semanggus Community; Anyar Community; Semanggus Baru Community)

- PT BSC Suppliers and Customers (22 stakeholders)
- Partner Contractors (21 Stakeholders)
- School (6 stakeholders).
- Hospitals, Insurance and Banking (7 stakeholders).

The company also has a SOP of Communication and Consultation with the community with document number 000 / BSC-KKM / IV / 010 I dated April 2, 2009. In the SOP it is explained that if there is something that wants to be communicated / consulted with the public, the unit manager gives a letter through the head Village. Head of Section must record the letter in the register communication / consultation with the community.

Based on the interviews with representatives of Muara Rengas Village, it was found that there had been socialization related to the Communication and Consultation SOP. The language used in the procedure is Bahasa. The Village also knew that PT BSC communications officer was Hilman Pribadi (PT BSC PSD team).

6.2.2 & 6.2.3

The officer responsible for communicating and consulting with the parties is the PT BSC PSD team with the manager of PSD (Hilman Pribadi). Based on the interviews with representatives of Muara Rengas Village, it was found that there had been socialization related to the Communication and Consultation SOP. The language used in the procedure is Indonesian. The Village also knew the communication officer of PT BSC.

The company shows documents requesting incoming letters and response letters to stakeholders for the period 2018 and January - July 2019. More information records regarding requests for assistance and requests for internships include:

- Incoming letter from Semangus Baru village, dated July 17, 2018 related to the request for assistance for the 73rd Indonesian Independence Day Anniversary
- Letter from SMK Negeri 2 Tugumulyo Lubuk Linggau on April 16, 2019 regarding information on student internships.

Every incoming letter has been responded to by the company such as a response to vocational internship information on April 28, 2019 which states the empty formation for internships is 2 people and can start activities in July 2019.

Status: Comply

6.3

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

6.3.1 & 6.3.2

At the time of ASA 1.2, the affected parties visited included Muara Rengas Village. The company has a SOP on Complaints Handling in the Community (No.005 / BSC-PKM / IV / 09 dated April 2, 2009); where every complaint is addressed to the manager through the section, the section records the complaint in the register book.

Workers understand that if there are complaints, they can submit them in writing or verbally to the direct supervisor as written in SOP / 006 / BSC / 2012 dated November 1, 2012 regarding the handling of employee complaints where employees submit complaints to the assistant through their respective supervision. Complaints are recorded in the register book and if it is still within the authority of the assistant, the assistant immediately responds to the complaint

In accordance with the SOP each complaint is addressed to the manager through the section. The results of interviews with Muara Rengas village representatives revealed to the PSD team that on several occasions they had informed and socialized about how to submit complaints. The company is committed to protecting each reporter if the reporter feels threatened. This is regulated in the code of conduct with policy No. 440 / HRM-COC / 07 CHAPTER VI concerning enforcement of the code of conduct part B point three (3) management must provide protection for the reporter.

Based on the review of PT BSC complaint book document, it is known that during the January-June 2019 period no complaints from external or internal parties were recorded. The results of interviews with representatives of Muara Rengas Village and BSE and SPF workers revealed that community and worker aspirations were more focused on information needs and requests for assistance as described in 1.1.2.

Status: Comply		
6.4		
Any negotiations concerning compensation for loss of legal or customary rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.		
6.4.1; 6.4.2 & 6.4.3.		
Based on interviews with community leaders in Muara Rengas Village who was also a landowner and a member of the land acquisition team at the initial stage of land clearing, it was found during the audit there was no land conflict with PT BSC, all conflicts were resolved through a court decision. It also said that the company did not commit violence and hire paramilitaries in maintaining operational security.		
The company shows a recapitulation of compensation for Sungai Pinang area from 1990 to 1999. For example: compensation on October 15, 1999 covering 203.5 ha and has been paid and signed by the Sungai Pinang village head, Head of Village of Anyar, PT Bina Sains Cemerlang and Head of Muara Lakitan District. There is maps area and names of landowners located in Sungai Pinang. The results of interviews with Muara Rengas village, until now the compensation has been done voluntarily. All land compensation information is carried out in Indonesian and is recorded in the land compensation document.		
Status: Comply		
6.5		
Pay and conditions for employees and for employees of contractors always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.		
6.5.1		
Work regulations that are used by companies include the following:		
<ul style="list-style-type: none">• Work Agreement of <i>BKS PPS</i> for <i>SKU-H</i> and <i>SKU-B</i> employees• Work Agreement for <i>PKWT</i> workers		
Wages given by the company refer to the South Sumatra Governor Decree Number 067 / KPTS / Disnakertrans / 2018 regarding Musi Rawas Regency Minimum Wage in 2019 on November 22, 2018. The decree stated that the minimum wage of Musi Rawas Regency was 2,944,681 ldr		
In addition, PT BSC management has wage provisions in accordance with IOM No 001 / RSP-i4.3 / I / 2019 from the Head of HRM dated January 3, 2019 on <i>SKU-H</i> and <i>SKU-B</i> salary structure for 2019 for PT Bina Sains Cemerlang for example 1G group wages the lowest is 2,997,741 ldr and the highest is 3,697,621 ldr		
<ul style="list-style-type: none">• Salary Payment : NIK 0000012963 Wage : 2,944,681 ldr; Rice : 159,002 ldr One hour overtime pay → Wage + Rice : 173 = 17,940.36 ldr Overtime : 672,763 ldr		
NIK	Wage	Overtime
0000012963	Rp 2.944.681	7 June : 5 Hour; (1x1.5) + (4x2) = 9.5 hour 15 June : 2 Hour; (1x1.5) + (1x2) = 3.5 hour 18 June : 2 Hour; (1x1.5) + (1x2) = 3.5 hour 19 June : 2 Hour; (1x1.5) + (1x2) = 3.5 hour 21 June : 3 Hour; (1x1.5) + (2x2) = 5.5 hour 22 June : 1 Hour; (1x1.5) = 1.5 hour 29 June : 5.5 Hour; (1x1.5) + (4.5x2) = 10.5 hour

Total overtime : 37.5 hour
Overtime payment : 37.5 x 17,940.36 =
672,763 ldr

Based on the interviews with the labor union representative, the BSS team, and the BMS team, it has been known that there have never been any wage problems. The wage payment system refers to the Musi Rawas Regency minimum wage. There are no piece worker and wage deduction system. The workers used are permanent and contract worker. For example for harvesters there is a base and premi system. After getting the base set, it will get a premi. Bases will be differentiated according to the average weight bunch. For example 125 bunch for AWB 15 Kg

At a certain time if the harvesters have finished work but do not get a FFB base (due to lack of FFB) the wages are still paid in full for completing the hectare harvest obligations. For upkeep workers the work status is a permanent employee.

6.5.2 & 6.5.3

The company shows the Collective Labor Agreement of the *BKS PPS* (Sumatra Plantation Company Cooperation Agency) with the Central Board of the Federation of Agricultural and Plantation Workers' Union *SPS*/ Decision Number by the Director General of Industrial Relations and Social Security Development No.Kep.88 / PHIJSK-PKKAD / PKB / VI / 2015. This CLA is valid for 2 years (April 21, 2015 until April 20, 2017).

Based on information from labour union representatives and PT BSC management representatives as well as information from the Musi Rawas Regency Manpower Agency, it is known that *BKS PPS* work agreement has not been updated and is still declared valid.

There are examples of employment agreements for PT BSC *PKWT* Workers, for example:

- Work Agreement Number: 021 / BSC / PKWT-Upkep / IV / 2019 dated April 1, 2019 between Sungai Pinang Estate Manager and Andi Lesta
- Work Agreement Number: 004 / BSC / PKWT-Upkep / IV / 2019 dated May 2, 2019 between Sungai Pinang Estate Manager and M. Fahri Ramadhan

The work agreement already contains clauses regarding employee rights and obligations, the Term of Agreement (Valid for six months), and performance appraisal. Based on interviews with representatives of SPE, SPF, and BPE workers revealed that there were no issues regarding wages. Wages paid according to minimum wages and agreements at the beginning

Based on the field observation and interviews with 2 residents of CHC housing (SPE and SPF) as well as 2 residents of Pondok II housing division 2 BPE, it was known that there were no complaints regarding housing facilities. Electricity and clean water facilities, sports facilities, and kindergarten and junior high schools are available. To meet the needs of food there are stalls and market days

The company also shows monitoring facilities and infrastructure of PT BSC employee welfare including the following:

- SPE & SPF (CHC): 3 Permanent G1 Houses; 49 permanent G2 houses; 3 School buildings; 1 clinic; 1 house of worship; Sports field; and 1 reservoir
- BPE: 3 Houses G1; 166 House G2; 2 Employee Centers; 3 Houses of Worship; 2 food rations and 3 reservoirs

6.5.4

Based on the field visit to CHC SPE & SPF as well as housing division II BPE and the results of interviews with 4 residents of the housing area, it is known that food sources can be easily accessed, for example by stalls in housing and vegetable and fish sellers who come to sell at housing locations. Employees can also buy food and daily necessities at the Muara Rengas village market, which operates every Sunday.

Status: Comply

6.6

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

6.6.1 & 6.6.2

The company has shown a commitment to support to form worker' unions set out in the Social Plantation Management Policy-Sustainable Management Guidelines in point 5 (No.Policy 724 / TQEM-SPMS / 09 dated 27/08/2010). At this point it was explained that the Company was expected to respect the rights of all employees to form and join the Labour Union community of their choice and to negotiate together.

Based on interviews with 2 harvesters in the C5 SPE block and 5 BSS teams in the G17 Division II BPE block, workers' representatives, and SPF process operators it is known that the company has never prevented employees from joining and forming a worker union.

Records of labour union meetings that were shown at the time of ASA assessment 1.2 include the following:

- December 15, 2018 concerning the socialization of the minimum wage in 2019. The meeting was attended by 10 participants who were representatives of the company and representatives of workers from the SPE, BPE, and SPF.
- 3 July 2019 concerning the socialization and emphasis of the occupational health and safety plan. The meeting was attended by 7 union representatives.

Status: Comply

6.7

Children are not employed or exploited.

6.7.1

PT Bina Sains Cemerlang has a policy regarding the age requirements for workers. The policy is listed in:

- Sustainable Plantation Management Guidelines, which are in the Social Policy sub-point, point 6 (Policy No.: 724 / TQEM-SPMS / 09, 27 August 2010). At that point, it was explained that Plantation Upstream Indonesia did not utilize underage workers (children).
- Joint Work Agreement for 2015 - 2017 article 16 point 1.2 concerning general requirements that must be fulfilled in the recruitment of prospective Workers, at sub point 1.2.2 it is explained that prospective workers are at least 18 years of age at the time of recruitment.

Based on the list of PT BSC employees, it is known that the youngest worker was born in 1999. He started working in May 2019 at the age of 20 years. In addition to the recruitment, one of the mandatory requirements is the identity of the worker (*KTP*) so that the company can ensure that there are no underage workers.

Status: Comply

6.8

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

6.8.1; 6.8.2; & 6.8.3

PT Bina Sains Cemerlang has a policy on equal opportunities and treatment in employment opportunities, which is listed in the Sustainable Plantation Management Guidelines, Social Policy sub in point 1 (No.Policy 724 / TQEM-SPMS / 09 dated 27/08/2010). At this point, it is explained that all staff / employees must be treated fairly in matters relating to recruitment, progress, conditions and job descriptions, regardless of race, degree, ethnicity, gender, skin color, imperfection (disability), sexual orientation, Company membership, political views, religion and age.

Based on the field observation and interviews with BSS and BMS team As well as harvesters of PT BSC it is known mostly that the composition of the workers are from the Near Villages such as Muara Rengas, Semanggu Baru, Semanggu Village and migrants from across provinces. Based on the list of employees, it can be seen the diversity of tribes and religions for each employee. Information obtained from employees representatives is known to the company has provided equal opportunities in employment opportunities.

There is no discrimination for workers, women or the local community. This can be seen from the composition of employees who do not distinguish between *SARA* (Ethnicity, Religion, Ras, and inter-group relations) and Gender. Based on interviews with union representatives and SPE, BPE and SPF employees, it was found that there had never been discrimination in the promotion process or employee assessments. An example of an employee promotion letter is as follows:

- Letter No 020 / RSP-i2 / VII / 2018 dated July 16, 2018 from the Head of Human Resource Management regarding the increase of Employees in the *SKU* region of the RSS region in 2018 for 20 employee
- IOM of the SPE Estate Manager on July 12, 2019 Number 017 / BSC / Agr-SPE / VII / 2019 regarding the promotion of NIK 40644 employees who were formerly employees of the Division I SPE become foreman coordinator SPE since July 15, 2019

Class promotion and promotion is based on employee appraisals that are carried out annually.

Status: Comply

6.9

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

6.9.1 & 6.9.2

The policy to prevent all forms of sexual harassment and violence is contained in the Social Plantation Management Sub-Policy Guide (No. Policy 724 / TQEM-SPMS / 09 dated 27/08/2010), related to the protection of women workers from crime and sexual harassment and protect the rights rights relating to female reproduction.

Based on interviews with a total of 11 female and male workers in blocks I22 and G17 BPE as well as block D6 division III SPE, information regarding handling in case of harassment or domestic violence has been conveyed. The existence and function of the gender committee is known by workers

The work program for the gender committee in 2019 includes:

- Reproductive health socialization program
- Cottage Cleaning Program
- Posyandu and nutrition improvement for Pregnant & Toddler mothers.
- Socialization regarding the handling of sexual harassment and domestic violence

The company has a Memorandum from the Chairman of SOU 22 regarding the treatment of pregnant and breastfeeding mom which is circulated throughout the Management operating unit. This memo contains a prohibition on hiring pregnant and breastfeeding mom in chemical related work fields.

In addition, the *PKB* 2015-2017 in Article VIII explained about the birth break according to Law No. 13 of 2003 Article 82) and H1 Leave which explains that women workers who are in pain during menstruation notify employers, are not obliged to work on the first and second on menstrual period after being given the truth by a Medical Officer at the company Clinic obtaining a sick permit.

Based on interviews with a total of 11 female and male workers in blocks I22 and G17 BPE as well as block D6 division III SPE, information regarding handling in case of harassment or domestic violence has been conveyed. The existence and function of the gender committee is known by workers

6.9.3

Mechanisms for handling complaints, which respect anonymity and protect whistleblowers are described in the SOP on Community Complaints Handling (PKM, Rev. 01, August 1, 2016) supplemented with the Community Complaints Handling Flow Chart. There are also SOP for Employee Complaints Handling (RSPO / 6.5 / PKK, 28 July 2009), Flow Chart for Employee Complaints Handling.

The mechanism has provided a way for workers to report complaints against the supervisor to someone other than the supervisor. The mechanism is documented, implemented and clearly communicated to all levels of workers through the activity of briefing before work or the socialization of town hall safety which is routinely carried out by the plantation and factory management units.

Based on the interviews with representatives of SPE, BPE, and SPF workers such as in Block G17 and I 22 BPE as well as blocks C5 and D6 BPE it is known that workers already know how to submit complaints. From a total of 8 workers interviewed claimed that they had never felt complaints against the company, especially regarding payroll problems and workloads.

Status: Comply

6.10

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

6.10.1, 6.10.2, 6.10.3 & 6.10.4.

The company is currently in the process of developing smallholders for the surrounding village community and does not receive FFB from other sources outside the company estate so there is no price fix for purchasing FFB from outside.

There is partnership with local communities to grass cutting activities based on interview and document review there is contract agreement with letter number 017 / cut grass / BSC-SPF / XII / 2018 dated December 17, 2018. The contractor is came from Anyar Village, Muara Lakitan District & Regency of Musi Rawas. The payment was been made on July 2019.

Status: Comply

6.11

Growers and millers contribute to local sustainable development wherever appropriate.

6.11.1.

The company showed CSR program for the 2019 period in the fields of education, local economic development, environmental care, & social, sports & cultural organizations with the following details:

- Assisting routine maintenance for the new road for Muara Rengas village.
- Routine maintenance assistance for roads to Sindang Laya located in Sindang Laya Village.
- Routine assistance for Indonesian Independence Day celebrations located in Sungai Pinang, Muara Rengas, Anyar & Semanggis Baru villages.
- Routine assistance for religious holidays celebrated in Sungai Pinang, Muara Rengas, Anyar & Semanggis Baru villages.
- Routine assistance for Eid al-Adha located in Sungai Pinang, Muara Rengas, Anyar & Semanggis Baru villages.
- Heavy equipment assistance for landfill Multipurpose Building located in the Village of Muara Rengas.
- Heavy equipment assistance for making reservoirs / ponds located in Muara Rengas Village.
- Heavy equipment assistance for the manufacture and Sungai Pinang Village roads.
- Assistance for installation of culverts on the Anyar Village road.
- Routine assistance for *Madrasah* located in Anyar Village.
- Teacher salaries are located in Anyar Village and Sungai Pinang Village.
- Provision of assistance for mini ketapang seeds to the Musi Rawas District Environmental Office.

6.11.2.

Location permit for development of smallholder's plantation Palm oil on behalf PT Bina Sains cemerlang according decision of Musi Rawas Regent with number 373/KPTS/BPM-PTP/2015 with scope area \pm 1,350 ha located in Muara Lakitan District & Musi Rawas Regency. Based on interview with Management representative planting of plasma just begin on June 2019 with total area 100 ha (Full managed). Based on that, the company just have Location permit for plasma. The area still on progress.

Status: Comply

6.12

No forms of forced or trafficked labour are used.

6.12.1; 6.12.2; dan 6.12.3

Based on document review and field observations in the activities of spraying, harvesting, manuring and Sungai Pinang Palm Oil Mill, there are no workers resulting from human trafficking. The composition of PT BSC workers is *SKU* and *PKWT*, all of which are Indonesian citizens. The distribution of labor based on the list of employees of PT BSC as of July 2019 are residents of surrounding villages such as Muara Rengas and Semanggis Villages as well as residents of regency and provincial.

	Status: Comply	
6.13		
Growers and millers respect human rights		
6.13.1		
<p>The company commitment to human rights protection is included in the Memorandum Number ist / int / II / 2018 signed by the chairman of SOU 22 on June 25, 2019. "Providing adequate training and development for each employee to improve quality so that life becomes a faithful human being, pious, responsible, noble, and prosperous in accordance with human rights.</p> <p>There is a socialization on Human Rights on December 7, 2018 to employees and residents of BPE housing. The results of interviews with spray workers block G17 division 2 and fertilizer workers Block I22 division 3 BPE revealed that the commitment to human rights protection has been implemented well and there have never been cases of human rights violations.</p>		
	Status: Comply	
PRINCIPLE #7 Responsible development of new plantings		
7.1		
A comprehensive and participatory independent social and environmental assessment is undertaken prior to establishing new plantings or operations, or expanding existing ones, and the results incorporated into planning, management and operations.		
7.1.1; 7.1.2 and 7.1.3		
<p>The company does not conducted new planting after Nov 2005 and the replanting was started in 2010 and the company has conducted SEIA for social impact of the replanting activity by Aksenta. SEIA focus on environmental impacts from replanting that affects the surrounding community including the company worker and job opportunity for local people in replanting activities. Evidence of community participation is available for each social impact study.</p>		
	Status: Comply	
7.2		
Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.		
7.2.1 & 7.2.2		
<p>The Company does not have the development of new areas after Nov 2005, It's currently conducting replanting.</p> <p>The company has a land suitability map by the document Semi- Detailed Soil Survey and Feasibility Study 2015 - 2020. In generally, topography of the company area is undulating with elevation 10-200 meters above sea level. The type of soil found in the area is Ultisol. Moreover, according to Slope Map, it is revealed that the slope of Sungai Pinang Estate is about 0 -4 % (flat) for 579.10 ha, 4 – 12 % (undulating) for 182,20 ha, 12 – 24 % (rolling) for 2,042.80 ha, 24 – 38 % (hilly) for 188.70 ha, and in Bukit Pinang Estate is about 0 -4 % (flat) for 49.30 ha, 4 – 12 % (undulating) for 36,10 ha, 12 – 24 % (rolling) for 2,176.60 ha, 24 – 38 % (hilly) for 984.40 ha and 38 – 50 % for 138.20 ha.</p>		
	Status: Comply	
7.3		
New plantings since November 2005, have not replaced primary forest or any area required to maintain or enhance one or more High Conservation Values.		
7.3.1 ; 7.3.2		
<p>Document review and interview showed that the company is performed land clearing after November 1, 2005 without preceded by the identification of HCV. Sime Darby Plantation Sdn Bhd, as the parent of PT BSC has conducted disclosure of liability in accordance with the letter from the Head of PSQM Department on July 15, 2015 which explained that PT BSC is performed land clearing in the period of November 2005 to November 2007 and land clearing in the period of December 2007 to December 2009. The validation progress of Remediation and Compensation Plan (RACP) for the area opened since November 1, 2005 without preceded by the identification of HCV in accordance with RACP. Based on a letter from RSPO August 10, 2017 is known PT Bina Sains Cemerlang is currently in the process of the LUCA submission, and then in this audit the management showing the update of RACP status submission, in 31 July 2018 RSPO has reverted that the contract of LUCA reviewer is undergoing review and that SDP LUCA is still in queue. 27 August 2018</p>		

SDP has submitted all shapefiles for the remaining management units to RSPO office. The company to be consider to follow up on the Remediation and Compensation Plan Progress (OFI).

7.3.3; 7.3.4 & 7.3.5

The results of document review and field visit show that the company does not perform new expansion since ASA-1.1 until ASA-1.2. The oldest planting year in PT BSC is 1991. Areas defined as HCV has been managed by the management unit as described in Criterion 5.2.

Status: OFI

7.4

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

7.4.1 & 7.4.2

The Company does not have the development of new areas after Nov 2005, It's currently conducting replanting.

The company has a land suitability map by the document Semi- Detailed Soil Survey and Feasibility Study 2015 - 2020. In generally, topography of the company area is undulating with elevation 10-200 meters above sea level. The type of soil found in the area is Ultisol. Moreover, according to Slope Map, it is revealed that the slope of Sungai Pinang Estate is about 0 -4 % (flat) for 579.10 ha, 4 – 12 % (undulating) for 182,20 ha, 12 – 24 % (rolling) for 2,042.80 ha, 24 – 38 % (hilly) for 188.70 ha, and in Bukit Pinang Estate is about 0 -4 % (flat) for 49.30 ha, 4 – 12 % (undulating) for 36,10 ha, 12 – 24 % (rolling) for 2,176.60 ha, 24 – 38 % (hilly) for 984.40 ha and 38 – 50 % for 138.20 ha.

Status: Comply

7.5

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

There is no new planting since 1 January 2010. There is no traditional and/or customary right in the HGU of PT BSC, it has been confirm through public consultation with communities around (Anyar Village and Board of AMAN Foundation) and related institution.

In the HGU Decree as well as EIA and HCV assessment documents, mentioned that the land of 6.513 Ha is state land (consisting of directly controlled by country 3,600 Ha; 2,188 Ha is a forest area released under Minister of Forestry Decree No 456 / Kpts-II / 90 dated 24 August 1990; and under decree of Menhut No. 36 / Kpts-II / 1998 covering an area of 731 Ha dated January 14, 1998). Can be shown Occupational Land Acquisition SOP No Policy 343 / PSD-OKUP / 11 authorized by HPUI, HPO, GM and Head in Charge on February 23, 2012.

Status: Comply

7.6

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

There is no new planting since 1 January 2010. There is no traditional and/or customary right in the HGU of PT BSC, it has been confirm through public consultation with communities around (Anyar Village and Board of AMAN Foundation) and related institution.

In the HGU Decree as well as EIA and HCV assessment documents, mentioned that the land of 6.513 Ha is state land (consisting of directly controlled by country 3,600 Ha; 2,188 Ha is a forest area released under Minister of Forestry Decree No 456 / Kpts-II / 90 dated 24 August 1990; and under decree of Menhut No. 36 / Kpts-II / 1998 covering an area of 731 Ha dated January 14, 1998). Can be shown Occupational Land Acquisition SOP No Policy 343 / PSD-OKUP / 11 authorized by HPUI, HPO, GM and Head in Charge on February 23, 2012.

Status: Comply

7.7 Use of fire in the preparation of new plantings is avoided other than in specific situations, as identified in the ASEAN guidelines or other regional best practice.		
7.7.1 & 7.7.2 The Company does not have the development of new areas, it's currently conducting replanting. The Company is committed to open land without burning (zero burning) during land clearing as stipulated in the policy of protection of the environment on 30 April 2013 and described in the SOP Reference Manual Agronomy planting oil palm on 1 September 2013. Based on the results of field observations to the D11 Division 1 Bukit Pinang Estate block, it was found that there was no indication of replanting activities using the burn method, the company carried out replanting activities by means of chipping.		
	Status: Comply	
7.8 New plantation developments are designed to minimise net greenhouse gas emissions.		
7.8.1 & 7.8.2 <i>There is no new planting since 1 January 2010.</i> There is no traditional and/or customary right in the HGU of PT BSC, it has been confirm through public consultation with communities around (Anyar Village and Board of AMAN Foundation) and related institution. In the HGU Decree as well as EIA and HCV assessment documents, mentioned that the land of 6.513 Ha is state land (consisting of directly controlled by country 3,600 Ha; 2,188 Ha is a forest area released under Minister of Forestry Decree No 456 / Kpts-II / 90 dated 24 August 1990; and under decree of Menhut No. 36 / Kpts-II / 1998 covering an area of 731 Ha dated January 14, 1998). Can be shown Occupational Land Acquisition SOP No Policy 343 / PSD-OKUP / 11 authorized by HPUI, HPO, GM and Head in Charge on February 23, 2012.		
	Status: Comply	
PRINCIPLE #8 Commitment to continuous improvement in key areas of activity		
8.1 Growers and millers regularly monitor and review their activities and develop and implement action plans that allow demonstrable continuous improvement in key operations.		

8.1.1

The company has conducted internal audit RSPO on 19 to 22 May 2019, the non-conformance has already fulfilled.

Best Management Practices.

The company has implemented a mechanization system in pruning, circle and path spraying.

Gender Committee

The company has an improvement related the gender committee in 2019 if comparison with previous year such as reproductive health socialization program, *Posyandu* and nutrition improvement for Pregnant & Toddler mothers.

Status: Comply

3.2 Summary of Assessment Report of Supply Chain Requirement

3.2.1. General chain of custody requirements for the supply chain

Clause	Requirement
5.1	Applicability of the general chain of custody requirements for the supply chain
5.1.1	<p>The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. After the end product manufacturer, there is no further requirement for certification.</p> <p>The company has sub license ID with number CB78153 Member name: Sime Darby Plantation – Sungai Pinang POM, PT BSC. Member ID: RSPO_PO1000000316 RSPO Membership number: 1-0008-04-000-00 (Sime Darby Plantation Berhad)</p> <p>Facility usually sold their CSPO & CSPK directly to the buyer to the contract or sent to rent bulking in Palembang. All dispatch process documented in mill and marketing Jakarta. Such as:</p> <ul style="list-style-type: none"> • Agreement letter for bulking rent with number PTPS/BSC/036/2018 date on 01 August 2018. • Agreement letter for CPO & PK transporter of CV Semangus Indah Ekspres on December 30th 2018 with number 012/Jasa Pengangkutan CPO-PK/BSC-SIE//2017. This agreement is valid from 11 January 2019 until 31 October 2019.
	Status: Comply
5.1.2	<p>Traders and distributors require a license obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model.</p> <p>Facility usually sold their CSPO and CSPK directly to the buyer according to the contract or sent to rent bulking in Palembang.</p>
	Status: Comply
5.1.3	<p>Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform.</p> <p>Sungai Pinang POM have sub license ID with number CB78153 Member name: Sime Darby Plantation – Sungai Pinang POM, PT BSC. Member ID: RSPO_PO1000000316 RSPO Membership number: 1-0008-04-000-00 (Sime Darby Plantation Berhad). Start date: 29 November 2018. End date: 10 September 2019.</p>
	Status: Comply
5.1.4	<p>Processing aids do not need to be included within an organization's scope of certification.</p> <p>There is no using processing aids.</p>
	Status: Comply
5.2	Supply chain model
5.2.1	<p>The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading</p>

can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.	
Yes, mill has applied Identity Preserved (Module D) for mill.	
	Status: Comply
5.2.2	
The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	
Sungai Pinang POM using Identity Preserved (Module D) for mill.	
	Status: Comply
5.3	Documented procedures
5.3.1	
The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified.	
Unit management has procedures to ensure the implementation of RSPO supply chain requirements in SOP No. 01/BSC-SCCS/18 dated January, 1 st 2018 and manual of supply chain certification standard (SCCS-Std/RSPO/PSQM/02 dated January, 2 nd 2018. In section 6 explained:	
<ul style="list-style-type: none"> • Factory Manager: keeps and maintains all documents and records, verifies the status of the products shipped, provides adequate training to all personnel involved, and is responsible for the entire implementation of the SOP. • PSQM Assistant: checks the quality of FFB, delivery and loading / unloading supervision, performs analysis and quality testing, stores and maintains the results of the analysis test. • Assistant / Sr. Assistant / Bulking / Logistic Manager: CPO and PK product transportation, CPO and PK handling storage in bulking and third party areas, monitoring on product quotas, coordinating with marketing. 	
Those person above are the person who taking responsibility and authority over the implementation of these requirements and compliance with all applicable requirements.	
	Status: Comply
5.3.2	
The site shall have a written procedure to conduct annual internal audit	
Unit management has a manual of supply chain certification standard (SCCS-Std/RSPO/PSQM/02 dated January, 2 nd 2018). In section 4.2 on this document written that facility shall conducted internal audit annually to ensuring implementation are comply with supply chain standard and market communication and claim. Internal audit conducted at least 2 month before external audit from CB's. Internal audit has been conducted on May 20 th 2019by PSQM team.	
	Status: Comply
5.4	Purchasing and goods in
5.4.1	
The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier	
Sungai Pinang POM has documented all information of their palm oil products. The sources of material input are FFB in the certified area. Such as: Based on FFB receive with ticket number 167849 from Sungai Pinang Estate, with DO number 46719101488, Nett weight 6,140 kg, date on July 22 nd 2019 and had been stamped with RSPO certified. Based on delivery letter of FFB with number 467 191 01488 Division 1 SPE has been stamped with RSPO certified.	
Delivery order (with number 00431/00405/07/19/I-BSC-MKS) for CPO from PT Indokarya Internusa address in Tanjung Mulia Medan, North Sumatera with quantity 1,000 MT delivery on 18 July 2019 – 31 July 2019 by truck CV Semanggus Indah Express.	
	Status: Comply

5.4.2

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

Unit management has RSPO SCCS manual (RSPO Supply Chain Certification Standard) with document number SCCS-Std/RSPO/PSQM/02 rev 01 date on January 2nd, 2018. In point 4.3.1 incoming and outgoing goods it explained unit management must ensure product is pass verification as certified product RSPO. Checking of validity is by Marketing of Jakarta.

Status: Comply

5.5
Outsourcing activities
5.5.1

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

Unit management has RSPO SCCS manual (RSPO Supply Chain Certification Standard) with document number SCCS-Std/RSPO/PSQM/02 rev 01 date on January 2nd, 2018. In point 4.5.1 Outsourcing activities. Unit management must ensure that outsourcing parties must comply with requirements of RSPO SCCS. Unit Management must have agreement letter or contract through written letter Agreement. Unit management must ensure CB can have accesses to audit contractor if necessary. There is no outsources processing activities like refining and crushing.

The company has activities work and report card documents in 2018 for contractors which includes reviewing the inspection of activities in accordance with standards including checking the quality of work, availability / completeness of PPE, consistency of PPE usage, availability of Operation Permit Letter, Inspection of Contractor's Residence, availability of health insurance BPJS and Employment, etc.

Status: Comply

5.5.2

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

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

Unit management didn't use outsourcing. All product FFB is comes from own estate.

Unit management shows the names of transportation services for CPO & PK such as:

Contractor names	Address	Transport destination	Product
CV Semangus Indah Express	Kalidoni District, Palembang, South Sumatera	PT Lonsum, PT Smart, PT SAP, PT IKI	CPO & PK

- Agreement letter for CPO & PK transporter of CV Semangus Indah Ekspres on December 30th 2018 with number 012/Jasa Pengangkutan CPO-PK/BSC-SIE//2017. This agreement is valid from 11 January 2019 until 31 October 2019.
- The company shows a certificate regarding the willingness of the contractor (CV Semangus Indah Ekspres) to be able to provide information to the certification body if necessary dated July 24, 2019.

Status: Comply

5.5.3

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

Unit management didn't use outsourcing. All product FFB is comes from own estate. But unit management only uses transportation services for CPO & PK.

Unit management shows the names of transportation services for CPO & PK such as:

Contractor names	Address	Transport destination	Product
CV Semangus Indah Express	Kalidoni District, Palembang, South Sumatera	PT Lonsum, PT Smart, PT SAP, PT IKI	CPO & PK

- Agreement letter for CPO & PK transporter of CV Semangus Indah Ekspress on December 30th 2018 with number 012/Jasa Pengangkutan CPO-PK/BSC-SIE/II/2017. This agreement is valid from 11 January 2019 until 31 October 2019.
- The company shows a certificate regarding the willingness of the contractor (CV Semangus Indah Ekspress) to be able to provide information to the certification body if necessary dated July 24, 2019.

Status: Comply

5.5.4

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

It will be observed in the next surveillance.

Status: Comply

5.6

Sales and goods out

5.6.1

The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form: The name and address of the buyer

Unit management showed the buyer list for CPO & PK period July 2018 until June 2019 with details below:

Buyer	Address	Products
PT Patisindo Sawit	Kidul Ilir Timur II Boom Baru Palembang	CPO
PT Golden Hope Nusantara	Sei Taib Village, Pulau Laut Utara Sub-District, Kotabaru District, South Borneo.	CPO
PT Indokarya Intinussa	Palembang	CPO
PT Sinar Alam Permai	Palembang	CPO
PT Guthrie Pecconina Indonesia	Sekayu, Musi Banyuasin District	CPO
PT Sinar Alam Permai	Palembang	CPO & PK
PT Kurnia Tunggal Nugraha	Jambi	PK

Status: Comply

5.7

Registration of transactions

5.7.1

Supply chain actors who:

- are mills, traders, crushers and refineries; and
- take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable

Unit management has shown their transaction document that consist registration in IT platform. It also can be downloaded at RSPO palm trace.

	Status: Comply
5.7.2 The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform: <ul style="list-style-type: none"> Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures. Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually. Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed. Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements. 	
Observed evidence : <ul style="list-style-type: none"> Quota certified volume data for November 29, 2018 until September 10, 2019 on palm trace, CSPO 16,988 MT and CSPK 3,685 MT. CSPO & CSPK sales data for period July 1, 2018 - June 30, 2019: <ul style="list-style-type: none"> CSPO sold conventionally amounted to 16,346 MT. CSPK sold conventionally amounted to 3,446 MT. Volume removed / credit allocations on the palm trace for CSPO: 15,000 MT and CSPK: 3,000 MT. Current remaining palm trace data during audit CSPO: 1,988 MT & CSPK: 685 MT. 	
Non-Conformance Description : Based on the data above, the company has not been able to show a reduction (removed stock) of CSPO Conventional sales of 1,346 MT and CSPK of 446 MT on palm trace.	
	Status: Nonconformance No.2019.08 with major category.
5.8	Training
5.8.1 The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff	
Unit management has been shows SCCS training date on October 12 th , 2019, November 16 th , 2019 and December 14 th 2019.	
	Status: Comply
5.8.2 Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed	
Unit management has been shows SCCS training date on October 12 th , 2019, November 16 th , 2019 and December 14 th 2019. The last training has been held on March 27 th 2019.	
Based on interview with securities officer & Clerk of Weighbridge, they have been know related incoming FFB, supply chain system and standard and others.	
	Status: Comply
5.9	Record keeping

5.9.1

The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements

Unit management has RSPO SCCS manual (RSPO Supply Chain Certification Standard) with document number SCCS-Std/RSPO/PSQM/02 rev 01 date on January 2nd, 2018. In point 4.9 Record keeping explained that:

- The thirsty organization maintains accurate, complete, up-to-date, well-accessed reports and records covering all aspects of the RSPO SCCS requirements.
- Time of keeping all records and reports for a minimum of 10 years for financial documents and transactions and a minimum of 2 years for data other than financial documents.
- The organization must be able to provide an estimate of the number of CPO / CPKO (in separate categories) of RSPO-certified palm oil products and always maintain by updating records of purchases (inputs) and claims (output) for 12 months.

Status: Comply

5.9.2

Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock

Unit management has RSPO SCCS manual (RSPO Supply Chain Certification Standard) with document number SCCS-Std/RSPO/PSQM/02 rev 01 date on January 2nd, 2018. In point 4.9 Record keeping explained that:

- The thirsty organization maintains accurate, complete, up-to-date, well-accessed reports and records covering all aspects of the RSPO SCCS requirements.
- Time of keeping all records and reports for a minimum of 10 years for financial documents and transactions and a minimum of 2 years for data other than financial documents.
- The organization must be able to provide an estimate of the number of CPO / CPKO (in separate categories) of RSPO-certified palm oil products and always maintain by updating records of purchases (inputs) and claims (output) for 12 months.

Status: Comply

5.9.3

The organization shall be able to provide the estimate volume of palm oil / palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.

Unit management has RSPO SCCS manual (RSPO Supply Chain Certification Standard) with document number SCCS-Std/RSPO/PSQM/02 rev 01 date on January 2nd, 2018. In point 4.9 Record keeping is explained that: the organization must be able to provide an estimate of the number of CPO/CPKO (in separate categories) RSPO palm oil products and always maintain and update records of purchases (inputs) and claims (output) for 12 months.

FFB, CPO & PK production for July 1st, 2018 until June 30th 2019 with details bellows:

Products	Volume (MT)
FFB	77,869.78
CPO	16,488.90
PK	3,612.63

Based on palm trace data on 24 July 2019 there is additional/extend volume for FFB as much as 73,621 tones, CSPO 15,764 tones and CSPK as much as 3,518 tones.

Status: Comply

5.10
Conversion factors
5.10.1

Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org); RSPO Rules for Physical Transition of Oleochemicals and its Derivatives. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries	
Unit management didn't using conversion rate. But there is procedure RSPO SCCS manual (RSPO Supply Chain Certification Standard) with document number SCCS-Std/RSPO/PSQM/02 rev 01 date on January 2 nd , 2018. In points 4.10 Conversion factors.	
	Status: Comply
5.10.2 Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	
Unit management didn't using conversion rate. But there is procedure RSPO SCCS manual (RSPO Supply Chain Certification Standard) with document number SCCS-Std/RSPO/PSQM/02 rev 01 date on January 2 nd , 2018. In points 4.10 Conversion factors.	
	Status: Comply
5.11	Claims
5.11.1 The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.	
Unit management didn't use logo during communication with stakeholders and customer. There is procedure related RSPO rule for company communication it's include in document number M-PLA/KCP/MA/SPF/02 Appendix A Rev 00 date on Juli 1 st , 2014.	
	Status: Comply
5.12	Complaints
5.12.1 The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	
Unit management has RSPO SCCS manual (RSPO Supply Chain Certification Standard) with document number SCCS-Std/RSPO/PSQM/02 rev 01 date on January 2 nd , 2018. In point 4.11 (Claims) explained that:	
<ul style="list-style-type: none"> Stakeholders can complain by making a letter in writing or in the form of an e-mail addressed to management representative or verbally meet MR. Stakeholder complaints must be followed up by MR both verbally, in writing or by email no later than 1 month after the complaint is received. Complaints related to rights in the form of salaries, allowances, incentives, product complaints, payments must be followed up no later than 14 days after the complaint was received. Discussion of the complaint problem as stated in 4.11.3 must be resolved by holding a meeting: Manager, Head of Section, and Management Representative. All complaints submitted and the answers given must be properly recorded and documented. 	
Based on management review on May 21 st 2019. There is no Complaint for customer or stakeholders for period 2019. The company has been make listing for complaint register.	
	Status: Comply
5.13	Management review
5.13.1	

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

Unit management has RSPO SCCS manual (RSPO Supply Chain Certification Standard) with document number SCCS-Std/RSPO/PSQM/02 rev 01 date on January 2nd, 2018. In Management review poin 4.13 its explained:

The organization needs to establish a management review plan implemented:

- After internal audit.
- Before the external audit check.
- At least once in 12 months (1 year).

4.13.2 Inputs to management reviews must include information:

- Results of internal audit of RSPO SCCS requirements.
- Achievement of production
- Feedback from customers
- Status of preventive and corrective actions.
- Follow up on management review
- Changes that can have an effect on the management system.
- Recommendations for improvement.

4.13.3 Outputs for management review must include decisions and actions related to:

- Increased effectiveness of management systems and processes.
- Resource Requirements

4.13.4. The implementation of review management is the responsibility of the Mill Manager & its implementation is led by the Management Representative of Mill.

Internal audit has been conducted on May 20th 2019 by PSQM team.

Unit management has RSPO SCCS manual (RSPO Supply Chain Certification Standard) with document number SCCS-Std/RSPO/PSQM/02 rev 01 date on January 2nd, 2018. In Management review poin 4.13 its explained:

The organization needs to establish a management review plan implemented:

- After internal audit.
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- Results of internal audit of RSPO SCCS requirements.
- Achievement of production
- Feedback from customers
- Status of preventive and corrective actions.
- Follow up on management review
- Changes that can have an effect on the management system.
- Recommendations for improvement.

4.13.3 Outputs for management review must include decisions and actions related to:

- Increased effectiveness of management systems and processes.
- Resource Requirements

4.13.4. The implementation of review management is the responsibility of the Mill Manager & its implementation is led by the Management Representative of Mill.

Internal audit has been conducted on May 20th 2019 by PSQM team.

Status: Comply

5.13.2

The input to management review shall include information on:

- Results of internal audits covering RSPO Supply Chain Certification Standard.
- Customer feedback.
- Status of preventive and corrective actions.
- Follow-up actions from management reviews.
- Changes that could affect the management system.
- Recommendations for improvement.

Unit management show management review on May 21st 2019 consist of point management review, finding, action plan, PIC & Time schedule.

Status: Comply

5.13.3

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

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

Unit management show management review on May 21st 2019 consist of point management review, finding, action plan, PIC & Time schedule. Such as:

Point management review,

Internal audit : There is no Training program

Action plan: making whole training program for employees

PIC: Head of administration.

Time schedule: May 30th 2019.

Status: Comply

3.2.2. Module D – CPO Mills: Identity Preserved Requirements

Clause	Requirement																																															
D1	Definition																																															
D.1.1																																																
A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from plantation/ estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Module E is applicable.																																																
Sungai Pinang POM shows FFB receipts from plantation (Sungai Pinang Estate & Bukit Pinang Estate), Based on FFB production for period 1 July 2019 – 31 June 2019 with details bellow:																																																
<table><tr><th rowspan="2">Months July 2018 – June 2019</th><th colspan="2">FFB (tonnes)</th></tr><tr><th>Bukit Pinang Estate</th><th>Sungai Pinang Estate</th></tr><tr><td>July</td><td>3,794.71</td><td>4,598.31</td></tr><tr><td>August</td><td>3,488.2</td><td>4,753.59</td></tr><tr><td>September</td><td>4,476.86</td><td>5,406</td></tr><tr><td>October</td><td>3,932.42</td><td>5,001.67</td></tr><tr><td>November</td><td>3,230.28</td><td>4,036.26</td></tr><tr><td>December</td><td>2,852.39</td><td>3,158</td></tr><tr><td>January</td><td>2,597.61</td><td>3,672.96</td></tr><tr><td>February</td><td>2,077.07</td><td>2,688.39</td></tr><tr><td>March</td><td>1,943</td><td>2,792.16</td></tr><tr><td>April</td><td>1,734.1</td><td>2,716.77</td></tr><tr><td>May</td><td>2,507.9</td><td>1,677.95</td></tr><tr><td>June</td><td>2,913.94</td><td>1,819.24</td></tr><tr><td>Total</td><td>35,548.48</td><td>42,321.30</td></tr><tr><td>Grand Total</td><td colspan="2">77,869.78</td></tr></table>		Months July 2018 – June 2019	FFB (tonnes)		Bukit Pinang Estate	Sungai Pinang Estate	July	3,794.71	4,598.31	August	3,488.2	4,753.59	September	4,476.86	5,406	October	3,932.42	5,001.67	November	3,230.28	4,036.26	December	2,852.39	3,158	January	2,597.61	3,672.96	February	2,077.07	2,688.39	March	1,943	2,792.16	April	1,734.1	2,716.77	May	2,507.9	1,677.95	June	2,913.94	1,819.24	Total	35,548.48	42,321.30	Grand Total	77,869.78	
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Grand Total	77,869.78																																															
Interview with clerk of weighbridge station, its known they have been know related supply chain standard and incoming of FFB from certified area (Sungai Pinang & Bukit Pinang Estate).																																																
	Status: Comply																																															
D.2	Explanation																																															
D.2.1																																																
The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the certification body (CB) in the public summary of the P&C certification report. For an independent mill, the estimated tonnage of CPO and PK products must be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report																																																
Unit management shows estimates of certified CPO & PK products with the following bellows:																																																
Product	<table><tr><td>Previous assessment ASA 1.1 RSPO for period 11 September 2018 to 10 September 2019 (Tones)</td><td>Actual Production period 1 July 2018 until 30 June 2019 (Tones)</td></tr></table>	Previous assessment ASA 1.1 RSPO for period 11 September 2018 to 10 September 2019 (Tones)	Actual Production period 1 July 2018 until 30 June 2019 (Tones)																																													
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	*Extend volume	
FFB	77,900	77,869.78
CPO	16,988	16,488.90
PK	3,685	3,612.63
Status: Comply		
D.2.2		
The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform).		
Sungai Pinang POM have sub license ID with number CB78153 Member name: Sime Darby Plantation – Sungai Pinang POM, PT BSC. Member ID: RSPO_PO1000000316 RSPO Membership number: 1-0008-04-000-00 (Sime Darby Plantation Berhad). Start date: 29 November 2018. End date: 10 September 2019.		
Status: Comply		
D.3	Documented procedures	
D.3.1		
The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall		
a. Complete and up to date procedures covering the implementation of all the elements in these requirements;		
b. The role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site's procedures for the implementation of this standard.		
Unit management has the complete procedures to ensure the implementation of RSPO supply chain requirements in SOP No. 01/BSC-SCCS/18 dated January, 1 st 2018. In section 6 explained:		
<ul style="list-style-type: none">• Factory Manager: keeps and maintains all documents and records, verifies the status of the products shipped, provides adequate training to all personnel involved, and is responsible for the entire implementation of the SOP.• PSQM Assistant: checks the quality of FFB, delivery and loading / unloading supervision, performs analysis and quality testing, stores and maintains the results of the analysis test.• Assistant / Sr. Assistant / Bulking / Logistic Manager: CPO and PK product transportation, CPO and PK handling storage in bulking and third party areas, monitoring on product quotas, coordinating with marketing.		
Those person above are the person who taking responsibility and authority over the implementation of these requirements and compliance with all applicable requirements.		
Status: Comply		
D.3.2		
The site shall have documented procedures for receiving and processing certified FFBs		
Unit management has the complete procedures to ensure the implementation of RSPO supply chain requirements in SOP No. 01/BSC-SCCS/18 dated January, 1 st 2018. In section 6 & transfer processing explained:		
<ul style="list-style-type: none">• Factory Manager: keeps and maintains all documents and records, verifies the status of the products shipped, provides adequate training to all personnel involved, and is responsible for the entire implementation of the SOP.• PSQM Assistant: checks the quality of FFB, delivery and loading / unloading supervision, performs analysis and quality testing, stores and maintains the results of the analysis test.• Assistant / Sr. Assistant / Bulking / Logistic Manager: CPO and PK product transportation, CPO and PK handling storage in bulking and third party areas, monitoring on product quotas, coordinating with marketing.		

Those person above are the person who taking responsibility and authority over the implementation of these requirements and compliance with all applicable requirements.

Status: Comply

D.4 Purchasing and goods in

D.4.1

The site shall verify and document the tonnage and sources of certified FFBs received.

Based on interview with securities and clerk of weighbridge station they have been know related incoming of Certified FFB & Non certified. SPF only received FFB from Certified plantation (Sungai Pinang dan Bukit Pinang Estate). Based on FFB receive with ticket number 167849 from Sungai Pinang Estate, with DO number 46719101488, Nett weight 6,140 kg, date on July 22nd 2019 and had been stamped with RSPO certified. Based on delivery letter of FFB with number 467 191 01488 Division 1 SPE has been stamped with RSPO certified.

Certified FFB received period of 1 July 2018 to 30 June 2019.

Months July 2018 – June 2019	FFB (tones)	
	Bukit Pinang Estate	Sungai Pinang Estate
July	3,794.71	4,598.31
August	3,488.2	4,753.59
September	4,476.86	5,406
October	3,932.42	5,001.67
November	3,230.28	4,036.26
December	2,852.39	3,158
January	2,597.61	3,672.96
February	2,077.07	2,688.39
March	1,943	2,792.16
April	1,734.1	2,716.77
May	2,507.9	1,677.95
June	2,913.94	1,819.24
Total	7,155.94	6,213.96
Total	35,548.48	42,321.30
Grand Total	77,869.78	

Status: Comply

D.4.2

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

Past Annual Claim Certified Product	Previous assessment ASA 1.1 RSPO for period 11 September 2018 to 10 September 2019 (Tones) *Extend volume	Actual Production period 1 July 2018 until 30 June 2019 (Tones)
FFB Process	77,900	77,869.78
CPO Production	16,988	16,488.90
PK Production	3,685	3,612.63

Status: Comply

D.5 Record keeping

D.5.1

The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.

Period (July 2018- June 2019)	CPO production (MT)		Total	Cert CPO Dispatch (MT)			Total
	Cert	Non Cert		RSPO	Other scheme	Non Cert	
July	1,687.69	-	1,687.69	-	-	1,272.42	1,272.42
August	1,789.62	-	1,789.62	-	-	822.80	822.80
September	1,997.81	-	1,997.81	-	-	1,751.89	1,751.89
October	1,935.20	-	1,935.20	-	-	350.62	350.62
November	1,414.55	-	1,414.55	-	-	629.69	629.69
December	1,306.85	-	1,306.85	-	-	4,070.88	4,070.88
January	1,424.07	-	1,424.07	-	-	2,632.30	2,632.30
February	1,052.21	-	1,052.21	-	-	870.310	870.310
March	1,046.67	-	1,046.67	-	-	1,362.94	1,362.94
April	965.89	-	965.89	-	-	838.55	838.55
May	924.81	-	924.81	-	-	763.03	763.03
June	943.53	-	943.53	-	-	981.15	981.15
Total	16,488.90	-	16,488.90	-	-	16,346.41	16,346.41

Period	PK production (MT)		Total	Cert PK Dispatch (MT)			Total
	Cert	Non Cert		RSPO	Other scheme	Non Cert	
July	347.78	-	347.78	-	-	395.900	395.900
August	382.87	-	382.87	-	-	457.100	457.100
September	486.63	-	486.63	-	-	344.770	344.770
October	396.30	-	396.30	-	-	113.310	113.310
November	289.77	-	289.77	-	-	408.780	408.780
December	277.60	-	277.60	-	-	619.370	619.370
January	328.91	-	328.91	-	-	360.330	360.330
February	226.82	-	226.82	-	-	241.250	241.250
March	230.56	-	230.56	-	-	224.510	224.510
April	215.57	-	215.57	-	-	233.290	233.290
May	208.45	-	208.45	-	-	202.990	202.990
June	221.38	-	221.38	-	-	240.100	240.100
Total	3,612.63	-	3,612.63	-	-	3,446.700	3,446.700

Status: Comply

D.6 Processing

D.6.1

The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm product including during transport and storage to strive for 100% separation.

Sungai Pinang Factory, PT Bina Sains Cemerlang only processes FFB from RSPO certified estate, subsequently, the entire product is CSPO and CSPK.

Status: Comply

3.3 Conformity Checklist of Certificate and Trademark Use

1.	Evidence of permission or approval certificate and trademark from Certification Body which submitted by Client	X or√
ASA-1.2	The company didn't use logo and trademark of RSPO.	√
	Status: Comply	
2.	Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of trademark Use	X or√
ASA-1.2	The company didn't use logo and trademark of RSPO.	√
	Status: Comply	
3.	Implementation of Certificate and Trademark is not used on product	X or√
ASA-1.2	The company didn't use logo and trademark of RSPO.	√
	Status: Comply	
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.	X or√
ASA-1.2	The company didn't use logo and trademark of RSPO.	√
	Status: Comply	

3.4 Summary of RSPO Partial Certification.

Compliance of the uncertified management units of Sime Darby Plantation Bhd 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

Sime Darby Plantation Bhd Time Bound Plan is explained in table section 1.10. Sime Darby has achieved 34 management units in Malaysia and 24 Management Units in Indonesia that RSPO certified. Total management unit in Sime Darby Plantation Bhd are 34 in Malaysia, 25 in Indonesia and 1 in Liberia. Sime Darby Plantation Bhd has informed the Time Bound Plan progress through representative's office in Indonesia. MUTU has considered that Sime Darby Plantation Bhd is comply with the RSPO requirement for Time Bound Plan. The Time Bound Plan was revised and declared by the Sime Darby Plantation Bhd Indonesian representative on June 16th, 2016 by the Head of PSQM.

MUTU has verified partial certification for un-certified unit's subsidiary of Sime Darby Plantation Bhd based on their Time Bound Plan. MUTU Auditor verified positive assurance against the company internal audit and supporting evidence as well as any information from others sources.

MUTU Auditor has verified company partial certification and concludes that:

- There are significant land conflicts in PT Mitra Austral Sejahtera, there is still an issue that remain unresolved social i.e. from Serikat Petani Kelapa Sawit (SPKS), but improvements are ongoing.
- PT Budidaya Agro Lestari waiting for land title process.
- 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>Company Group/Holding Statement: Companies are already doing internal audits. There are internal audit reports for each company.</p> <p>Auditor Verification: Internal Audit report available for uncertified management unit for example PT Sandika Natapalma – Karya Palma Estate</p> <p>Progress Update for PT MAS. Engagement with RSPO. SDP is submitting a monthly basis report to RSPO on the case. Five monthly update/responses have been submitted to RSPO to-date. The last report was submitted on 28 May 2018.</p> <p>On April 2019, the secretariat update the developments of PT MAS Complaint. The complaints panel recent deliberation, please be informed that the complaints Panel has directed to proceed with the legal review and Dr Kurnia</p>

		Warman will be engaged to perform the said legal review.
i.	<p>No replacement after dates defined in NIs Criterion 7.3 of:</p> <ul style="list-style-type: none"> • Primary forest. • Any area identified as containing High Conservation Values (HCVs). • Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3. 	<p>Company Group/Holding Statement: HCV assessment has been conducted for uncertified units i.e. PT Mitra Austral Sejahtera (by Aksenta in March 2009) and Sime Darby Plantation Liberia operations (by RSPO approved assessors – Dr SK Yap in 2011).</p> <p>Auditor Verification: Sime Darby Plantation Bhd sent disclosure of liability including LUCA analysis to RSPO Secretariat on 2 December 2014 and 2nd revision on 24 June 2016. The companies ensuring reporting of disclosure of liability progress to RSPO and according to the CB's correspondence with RSPO Remediation and Compensation.</p>
i.	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>Company Group/Holding Statement: A new mill will be set up in Liberia and planned for commissioning in February 2016. Preparation to undergo the RSPO Certification process is in progress and SDP targets to undergo RSPO Certification by end 2017. RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps is in progress. *Note: RSPO NPP Announcements for SDP can be found at http://www.rspo.org/certification/new-planting-procedures/public-consultations/page/14</p> <p>Auditor Verification:</p> <ul style="list-style-type: none"> • Karya Palma Estate (PT Sandika Natapalma) and Baturus Estate (PT Budidaya Agro Lestari) any new planting after January 1st 2010 and due to not conduct NPP. • RSPO NPP process has been completed in 2011 for a new mill in Liberia.
ii.	Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	<p>Company Group/Holding Statement: Sime Darby (Liberia) Plantation Inc. Status: Box G - Close for Monitoring Further details please refer to: http://www.rspo.org/members/complaints/status-of-complaints/view/46 PT Mitra Austral Sejahtera (Sime Darby Bhd) Further details please refer to: http://www.rspo.org/members/complaints/status-of-complaints/view/29</p> <p>Auditor Verification:</p>

		<p>Auditor has verified the supporting evidence of above the company statement.</p> <p>There are land conflict in PT Bina Sains Cemerlang, this issue was raise on 22 April 2017 and still being process to resolve.</p>
iii.	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	<p>Company Group/Holding Statement: No stakeholder comments or complaints received.</p> <p>Auditor Verification: Auditor has verified the supporting evidence of above the company statement. There are no labour dispute in company unit.</p>
iv.	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	<p>Company Group/Holding Statement: None noted. No stakeholder comments or complaints received.</p> <p>Auditor Verification: Auditor has verified the supporting evidence of above the company statement. There is any legal non-compliance for company under SDP waiting for land title process, ie:</p> <ul style="list-style-type: none"> • PT Sime Indo Agro 1,652 Ha • PT Aneka Inti Persada 421.31 Ha • PT Bina Sains Cemerlang 308.25 Ha • PT Bersama Sejahtera Sakti 765 Ha • PT Langgeng Muaramakmur 1,162 Ha • PT Paripurna Swakarsa 1,120 Ha • PT Swadaya Andika 63 Ha • PT Bahari Gembira Ria 1,639 Ha • PT Guthrie Pecconina Indonesia 4,133 Ha • PT Perkasa Subur Sakti 1,286 Ha

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

3.5.1. Identification of Findings, Corrective Actions and Observations at ASA 1.1.

<i>NCR No.</i>	: 2018.01	<i>Issued by</i>	: Bayu Yogatama
<i>Date Issued</i>	: 5 October 2018	<i>Time Limit</i>	: ASA 1.2
<i>NC Grade</i>	: Minor	<i>Date of Closing</i>	: 18 December 2018
<i>Standard Ref. & Requirement</i>	4.4.3 Records of plant wastewater monitoring must be available, especially BOD (Biochemical Oxygen Demand) and efforts to meet requirements according to applicable regulations (see criteria 2.1 and 5.6).		
Evidence observed (filled by auditor): <ul style="list-style-type: none"> Based on the results of field visits to the WWTP Pond it is known that the flow meter in the last pond is in a damaged state and cannot be lit. Based on a document study of the daily discharge of waste in the IPAL pond area it is known that the flow meter has been damaged from September 17, 2018, so that records only write the hours of the pump application Based on the review of the Liquid Waste Application Permit document in the plantation area owned by PT Bina Sains Cemerlang No. 436 / KPTS / DLH / 2017 mentioned in the attachment to point 3 that one of the company's obligations is to record daily debit data. Data for the procurement of new goods (CAPEX 2018) Sungai Pinang POM, there is a request for the procurement of flow meters for applications to the land application area. The condition is damaged and has become the findings of Environment Agency. in the regional office, but it is not yet known when the tender will be completed and the items can arrive at the unit to be paired. 			
Non-Conformance Description (filled by auditor): The company has not been able to show evidence of monitoring the actual daily wastewater discharge as well as efforts to fulfill the applicable requirements (Permit for Utilization of PT Bina Sains Cemerlang's Palm Oil Industry Waste Water).			
Root Cause Analysis (filled by organization audited): The Flow Meter is in a damaged condition because it has already been replaced period, a repair / replacement flow meter in the document has been made (capex 2018) but the procurement and installation time is still awaiting the tender process in the regional office.			
Correction (filled by organization audited): Substitution / repair of damaged flow meters immediately.			
Corrective Action (filled by organization audited): The company (SPF) makes monitoring monitoring of flow meters and makes a record of monitoring the discharge of liquid waste sent to WWTP.			
Assessor Evaluation and Conclusion (filled by auditor): Auditor Verification on November 14, 2018. <ul style="list-style-type: none"> Photo installation of 3 flow meters in the WTP area 			
Conclusion of the Auditor Based on evidence of improvement, the root cause of the problem and prevention that the company has submitted, the nonconformities have not been fulfilled, please answer the auditor's questions and show additional evidence.			

Auditor Verification November 22, 2018

The company has shown proof of additional improvements in the form of:

- Minutes of inspection of damaged flowmeter repair work (dated 12 November 2018).
- Payment receipt.
- Scan proof of recording flow meter of WWTP.

Conclusion of the Auditor November 22, 2018

Based on evidence of improvement, the root cause of the problem and prevention that the company conveyed, nonconformities were stated to be fulfilled, and their effectiveness would be ensured during the next major / audit verification activity.

Field Verification December 18, 2018

Based on the results field visits to the WWTP area are known to have runmeter and can be used.

Conclusion of the Auditor December 18, 2018

Based on evidence of improvement, the root causes of the problem and prevention that were conveyed by the company, as well as the results of the field verification of nonconformities were declared fulfilled.

Verified by : **Bayu Yogatama & Andi Pratama Pasaribu**

<i>NCR No.</i>	: 2018.02	<i>Issued by</i>	: Bayu Yogatama
<i>Date Issued</i>	: 5 October 2018	<i>Time Limit</i>	: ASA 1.2
<i>NC Grade</i>	: Minor	<i>Date of Closing</i>	: 18 December 2018
<i>Standard Ref. & Requirement</i>	4.4.4 Records of monitoring of water use per ton of FFB for palm oil mills must be available.		
Evidence observed (filled by auditor): <ul style="list-style-type: none">Based on the results of field visits to the WTP area, it was found that 3 Flow Meters installed were damaged and not lit (2 broke & 1 died)Data for the procurement of new goods (CAPEX 2018) PKS Sungai Pinang there is a request for the procurement of flowmeter for WWTP because the condition is damaged and has become the findings of Environment Agency, and an email reply from PIC shows that the flow meter is in the tender process in the regional office. but it is not yet known when the tender time will be completed and the items can arrive at the unit to be paired.			
Non-Conformance Description (filled by auditor): <p>The company has not been able to show data on actual monitoring of water use per tonne of FFB because the flow meter is damaged.</p>			
Root Cause Analysis (filled by organization audited): <p>The Flow Meter is in a damaged condition because it has already been replaced, a repair / replacement flow meter in the document has been made (capex 2018) but the procurement and installation time is still awaiting the tender process in the regional office.</p>			
Correction (filled by organization audited):			

The company immediately repairs / changes the damaged flow meter.
Corrective Action <i>(filled by organization audited):</i> The company always ensures that the flow meters in WTP always function properly. Periodic maintenance and monitoring is carried out by the WTP operator.
Assessor Evaluation and Conclusion <i>(filled by auditor):</i> Auditor Verification on November 14, 2018 <ul style="list-style-type: none"> Proof of PO Flow Meters measuring 6 "and 3" PT Bina Sains dated October 16, 2018 to CV Hydro Teknik Mandiri Proof of handover of goods from CV Hydro technic Mandiri for the purchase of 3 Flow Meters to PT Bina Sains dated November 1, 2018 Photo installation of 3 flow meters in the WTP area Conclusion of the Auditor Based on evidence of improvement, the root cause of the problem and prevention that the company delivered, nonconformity is stated to be fulfilled, and its effectiveness will be ensured during the next major / audit verification activity.
Field Verification December 18, 2018 Based on the Results Field visits to the WTP area are known that Flowmeter is running and can be used
Conclusion of the Auditor December 18, 2018 Based on evidence of improvement, the root causes of the problem and prevention that were conveyed by the company, as well as the results of the field verification of nonconformities were declared fulfilled.
Verified by : Bayu Yogatama

<i>NCR No.</i>	: 2018.03	<i>Issued by</i>	: Satria Adi Putra
<i>Date Issued</i>	: 05 October 2018	<i>Time Limit</i>	: 03 January 2019
<i>NC Grade</i>	: Major	<i>Date of Closing</i>	: 18 December 2018
<i>Standard Ref. & Requirement</i>	4.6.6 Pesticides are stored in recognized best practices. All pesticide containers must be managed appropriately according to applicable regulations and or instructions on packaging (see Criterion 5.3).		
Evidence observed (filled by auditor):			
The results of the document review on the Use of Chemistry for 2017-2018 include the use of pesticides, among others:			
<ul style="list-style-type: none">- Use of pesticides with the active ingredient isopropyl amine glyphosate (July - August 2018) in Sungai Pinang Estate as many as 1,316 liters or as many as 65 cans- Use of pesticides with active ingredient isopropyl amine glyphosate (June - August 2018) in Bukit Pinang Estate as many as 1,389 liters or as many as 69 cans			
Based of Monitoring Documents for the Recording of hazardous Waste and non-hazardous Waste for the period July - September 2018 are as follows:			
<ul style="list-style-type: none">- Recording of ex-packets of July 2018 herbicides (cans) in Sungai Pinang Estate as many as 0.0456 tons			

- Recording of ex-packets of August 2018 herbicides (cans) in Sungai Pinang Estate as much as 0.04 tons
- Recording of ex-packets of herbicides (cans) in September 2018 in Sungai Pinang Estate as much as 0.04 tons
- Listing of ex-packets of herbicides (cans) in July 2018 in Bukit Pinang Estate as many as 0.001 tons
- Registration of ex-packaged herbicide (cans) in August 2018 in Bukit Pinang Estate is 0.01 tons
- The total recording is 0.1366 tons.

Based on hazardous Waste Management Records Documents (Log Book). It is known that 0.0333 tons of shipments have been made and the remaining hazardous warehouse stock is 0 tons.

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

The company has shown a document on the Use of Chemistry for 2017-2018, a document for Monitoring the Registration of hazardous waste and non hazardous waste as well as a log book. But there are still differences in the recording of 0.1036 tons. Regarding this, the company has not been able to show evidence that all pesticide containers have been managed appropriately in accordance with applicable regulations.

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

There is a difference in the recording of pesticide containers sent to hazardous warehouse with the use of pesticides from the chemical warehouse because not all used pesticide packaging has entered the hazardous warehouse.

Correction *(filled by organization audited):*

Submit all used pesticide packaging in the BPE and SPE warehouse to hazardous warehouse in the SPF.

Corrective Action *(filled by organization audited):*

The company monitors the use of pesticides with the number of containers of pesticides. Ensure that all used pesticide containers are handed over to hazardous warehouse, not stored in the estate hazardous warehouse.

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

Verification of Documents December 17, 2018

Shipping Note for hazardous goods to SPF hazardous warehouse with number 01 / SPE / B3 / XII / 2018 dated 30 November 2018

- 31 pcs and Pesticide container 20 L as much as 6 pcs with a total weight of 51.8 kg (ex basta jerry can)
- 38 pcs weighing 15 kg (ex sentrin cans)
- Pesticide container with a total weight of 6 kg (ex starine jerry can)

Shipping Note for hazardous waste to SPF hazardous warehouse with number 01 / SPE / B3 / XI / 2018 dated November 8, 2018

- 15 pcs equivalent to 18 kg (ex 20 liters jerry can)

Shipping Note for hazardous waste to SPF hazardous warehouse with number 08 / SPE / B3 / XI / 2018 dated November 8, 2018

- 37 pcs equivalent to 51.8 kg (ex 20 liters jerry can)
- 37 pieces equivalent to 14.8 kg (ex sentrin cans)
- 42 Bottle Plastic Bottle compared to 4.2 kg (ex kenly can)

Shipping Note for hazardous waste to SPF hazardous warehouse with number 08 / SPE / B3 / XI / 2018 dated November 8, 2018

- 37 pcs equivalent to 51.8 kg (20 liter jerry can)
- 37 pcs equivalent to 14.8 kg (ex sentrin jerry can)
- 42 pcs equivalent bottles of 4.2 kg (ex kenly plastic bottle)

Shipping Note for hazardous waste to SPF hazardous warehouse with no 04 / SPE / B3 / 10/2018 dated October 1, 2018

- 57 Pcs or equivalent to 48 kg (ex ken up jerrycan)
- 7 pcs or equal to 1.05 kg (ex kenly jerrycan)

Shipping Note for hazardous waste to SPF hazardous warehouse with no 03 / SPE / B3 / 10/2018 dated October 1, 2018

- 49 Pcs or equal to 36 kg (ex ken up jerrycan)
- 10 pcs or 12 kg equivalent (ex basta jerrycan)
- 5 pcs or 7.5 kg equivalent (ex kenly jerrycan)

Shipping Note for hazardous waste to SPF hazardous warehouse with no 02 / SPE / B3 / 10/2018 dated October 1, 2018

- 18 pcs or equal to 21.6 kg (ex basta jerrycan)
- 19 pcs or equal to 22 kg (ex ken up jerrycan)
- 2 pcs or equal to 0.3 kg (ex bayfolan jerrycan)
- 6 pcs or equal to 0.9 kg (ex sentrin jerrycan)

Shipping Note for hazardous waste to SPF hazardous warehouse with no 01 / SPE / B3 / 10/2018 dated October 1, 2018

- 13 pcs equivalent to 12 kg (ex jerry)

Data uses Pesticide November 2018 SPE

- 11 basta jerrycan @ 20 liters
- 10 sterin jerrycan @ 5 liters

Data on Handover of Waste from SPE to hazardous warehouse in SPF dated December 17, 2018

- 0.0154 tons of ex chemical jerrycan
- 0.0029 tons of ex chemical cans

Data uses Pesticide November 2018 SPE

- 52 basta jerrycan @ 20 liters 62.4 kg
- 35 kg kenlon package
- Ex kenly 24.8 kg
- Knapsack Solo/Micron Herby Sprayer 30 kg

Data on Handover of Waste from BPE to hazardous warehouse in the SPF dated December 17, 2018

- 0.0624 tons of jerry (ex chemical)
- 0.0688 tons of can (chemical cans)

Logbook data for Sungai Pinang Factory
Stock on December 18, 2018 (0.531 tons).

Field Verification December 18, 2018

Based on field visits to the hazardous waste area. The condition of the hazardous waste stock is in accordance with what is stated in the context of hazardous waste. Used pesticide packaging was delivered to hazardous warehouse.

Auditor Reference December 18, 2018

Based on the facts, analysis of the problem, analysis and corrective effects disclosed by the company, the non conforminty was already fulfill.

Verified by : Bayu Yogatama

NCR No.	: 2018.04	Issued by	: Trismadi N
Date Issued	: 5 October 2018	Time Limit	: 3 January 2019
NC Grade	: Major	Date of Closing	: 18 December 2018
Standard Ref. & Requirement	4.7.3 Record of Occupational Health and Safety (OHS) program (see 4.8) and Personal protective Equipment (PPE) training in accordance with the result of hazard identification and risk analysis shall be available to all workers.		
Evidence observed (filled by auditor): <ol style="list-style-type: none">The Certification unit has provides the PPE to all workers in Estates and Mill, for example: record of PPE issuances dated 6 January 2018 on SPF, Purchasing 14 Pcs Respirator masks on SPE dated 25 November 2017 and rubber boots on BPE on May 2018.Based on document verification, field observations and interview with several workers in Estates and Mill sighted that:<ol style="list-style-type: none">One sterilizer operator doesn't use earmuffs.The safety shoes of boiler operator in damaged condition, he was explained that safety shoes are given once a year. While the average life time of safety shoes are 8 months, it cause the work location is quite oily.Based on interview with two hoisting crane operator, they doesn't have license. While the operators who have license has been transferred to other station license No. 560/1946/Nakertrans/2015 and No. 560/1944/Nakertrans/2015.Based on interview with WTP operator, it was explained that he has worked since last month. However, the company doesn't provided PPE's, such as: safety helmet, chemical gloves and masker. It's not comply with PPE's procedure.Based on interview with boiler operator, there are only one Boiler man License Class I (Parulian Sibarani Reg. P.01.7111.OPK3-PUBT-B.I/V/2016) and two Boiler man License Class II. It's not comply with Man Power Regulation No. PER.01/MEN/1988.According to list name of workers, there are six operator and helper on sterilizer station who didn't have license.SPF Manager dated 3 October 2018 about work rotation: the hoisting crane operator (licenses) back to the hoisting crane station, it cause the average of FFB process is less than 250 tons/day. So that the processing activities are only carried out in one shift only. However, if it refers to the SPF budget period of July 2018 to June 2019. The FFB process are 81,605.11 MT, it was potential two shift operations.Based on field observation and interview with manuring team on manual weeding activity at Block G20/G21, Division 1 SPE. They were explain that all of PPE's and working tools of manuring was stored in BSS home, however based on field observations to the BSS home. There were only seven clean clothes of BSS team.Based on field observation to the manuring activities at block O18, Division 1, BPE is also known that the masks and they didn't use plastic glasses there are not comply with procedure.			

6. Based on field observation and interview with BSS team at block E12, Division1, BPE sighted that some workers using dust masks and other workers using carbon mask. When referring to MSDS of 490 SL (Iso Propyl Amine) explained that the PPE's that should be using a Respirator mask (suitable for protection from the haze of pesticides).
7. The certification unit has PPE's Procedure No. 10/BSC-PSQM-ESH/16 dated 1 July 2017, point 3.4. PPE's replacing investigation: if the PPE's was damaged before the life time, it will be replaced with investigation by OHS Committee.

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

1. The certification unit has not been able to show evidence of the system to ensure that all operators (boilerman, sterilizer, and hoisting crane operators) has license from the Ministry of Manpower of Republic Indonesia.
2. The certification unit has not been able to demonstrate the effectiveness of the management system of providing, monitoring the usage and storage all of PPE's in accordance to procedures.

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

1. There is no operator licenses monitoring in the mill.
2. There are no minimum stock of PPE procurement, as a backup when the PPE's is damaged.
3. Monitoring the PPE's usage has not been carried out in accordance to procedure.

Correction *(filled by organization audited):*

1. The company has submitted extension of operator licenses and new applications for several operators.
2. The company has replaced the damage PPE's and PPE's procurement in accordance to SOP.

Corrective Action *(filled by organization audited):*

1. Safety officer in each unit will be monitor the validity period of operator licenses. Appointment of operator on each station will be adjusted to their competencies referring to the monitoring data.
2. The PPE's usage and PPE's condition monitoring every month by safety officer on each units.

Assessor Evaluation and Conclusion *(filled by auditor):*
Verification on 14 November 2018

The company was shown several evidences:

1. Approval from Area Controller and RSSJ CEO related to the submission of operator license dated 17 October 2018; Mr. Daniel Mangapul (Extension of Welder License), Mr. Abdul Kudus (Extension of electrical license), Mr Patoni (Sterilizer Operator License), Mr Solihin (Crane Operator License) and Sudarwan (Boiler Operator License).
2. Minute of meeting safety shoes provided to the boiler operator dated 25 October 2018.
3. Purchase order dated 15 September 2018 such as: 14 pcs rubber boot, 14 pcs respirator, 14 pcs aprone, and 14 pcs rubber gloves.
4. Record of PPE provided to 14 spraying workers as: 14 pcs rubber boot, rubber gloves, glasses, respirator and aprone dated 8 October 2018.
5. Minute of meeting PPE's usage socialization to the spraying workers dated 3 October 2018 in BPE.
6. Monitoring record of PPE usage to the BMS team such as: rubber boot, aprone, rubber gloves, glasses, and masker.

Verification on 22 November 2018

OHS guidance Policy No 10/BSC-PSQM-ESH/16 dated 19 November 2018, it was explained about:

- Provision of PPE is adjusted to the number employees and added 10% of the total number of employees as stocks.
- Working tools and PPE's of manuring and spraying will be store at the BSS House.

Verification and Field Observation on 17 to 18 December 2018

The company was shown several additional evidence, such as:

1. Letter of assignment from mill manager No 11/SPF/XI/2018 dated 3 December 2018 (Mr Abdul Kudus/Electric foreman) to attendance on ElectricatI OHS expert training by PT Arpindo Pratama dated 4 – 9 December 2018.
2. Letter of assignment from mill manager No 004/SPF/XI/2018 dated 14 December 2018 (Mr Surdarwan/boiler operator) to attendance on Boiler operator training by PT Arpindo Pratama dated 17 December 2018.
3. Letter of assignment from mill manager No 003/SPF/XI/2018 dated 14 December 2018 (Mr Patoni/boiler operator) to attendance on Boiler operator training by PT Arpindo Pratama dated 17 December 2018.
4. Validity of Operator licenses monitoring in SPF by Senior Assistant, there are 2 genset operator, 2 boiler operator, 2 hoisting crane operator, 2 sterilizer operator, 1 welder, and 1 Electrical thecnician.
5. Inter-Office Mail from BPE Senior Manager to the Area Controller Jambi No 003/PT BSC BPE/XI/2018 dated 19 November 2018 about propose of training welder (Sutanto), genset operator (Suratman) and Hartanto (Fire Expert) on 27 November 2018 by PT Arpindo Pratama.
6. Registration form (Suratman, Sutanto, and Hartanto) was approved by CEO of Riau Sumatera Selatan and Jambi dated 22 November 2018.
7. Purchase order of PPE's for workshop SPF No 4502252249 dated 2 November 2018 for 20 pcs safety shoes type 6" and 3 pcs safety shoes type 4"".
8. Purchase order of PPE's for workshop SPF No 45022522109 dated 2 November 2018 for 54 pcs safety shoes type PVC and 9 pcs safety shoes type 4"".

Based on field observation to the several location, obtained information such as:

Estate

1. Block G16, Division 2, BPE. Chemical spraying. Based on field observation there are 5 woman applicators, 1 mixing officer and 1 mandor. All of workers has been used PPE's: glasses, respirator, rubber boot, aprone and rubber gloves. Based on interview result there were places all PPE's and working tolls on BSS house Division 2.
2. Block F19, Division 2, BPE. Manuring activity, based on field observation there are 9 fertilizer workers and 1 foreman. BMS team were usage: glasse, masker, rubber gloves, apron and rubber boot. Based on interview result there were places all PPE's and working tolls on BSS house Division 2.
3. Block H010, Division 1, SPE. Manuring activity, based on field observation there are 10 fertilizer workers and 2 foreman. BMS team were usage: glasse, masker, rubber gloves, apron and rubber boot. Based on interview result there were places all PPE's and working tolls on BSS house Division 1.
4. Based on field observation to the BSS House at Division 1 SPE, there are no spraying activities. All of PPE's were places as: 10 pcs respirator, rubber gloves, glasses, aprone. There are clean clothes locker, bathrooms, washing facilities for equipment and PPE's and toilets.
5. Based on field observation to the BSS House at Division 2 BPE, There are clean clothes locker, bathrooms, washing facilities for equipment&PPE's.

Mill

Based on field observation sight that:

1. Sterilizer operator, hoisting crane operator and boiler operator have has licenses.
2. Sterilizer and Boiler operators were using PPE's: safety shoes, masker, helmet, ear plug and masker.
3. WTP operator was using PPE's: safety shoes, masker, helmet and gloves.

Auditor conclusions:

Based on above explanation, this NCR has been closed.

Verified by	:	Trismadi N & Bayu Y
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<i>NCR No.</i>	:	2018.05	<i>Issued by</i>	:	Trismadi N
<i>Date Issued</i>	:	5 October 2018	<i>Time Limit</i>	:	ASA-1.2
<i>NC Grade</i>	:	Minor raised to Major	<i>Date of Closing</i>	:	24 October 2019
<i>Standard Ref. & Requirement</i>	:	4.7.6. All workers shall be provided with medical care, and covered by accident insurance (see criterion 6.5.3).			
Evidence observed (filled by auditor): 1. The company has agreement with several contractor, for example: CPO transport No. 012/Jasa Pengangkutan/BSC-SIE/XI/2017 dated 1 November 2017 with CV Semangus Indah Ekspres. However there are no clauses about obligation of contractor to register all contractor worker on health insurance and accident insurance. 2. Based on interview with FFB transport contractor, sighted that they has been paid allowance for paying health and accident insurances.					
Non-Conformance Description (filled by auditor): The company has not been able to show that all workers have been provided with health services and covered by accident insurance.					
Root Cause Analysis (filled by organization audited): There are no written provisions regarding BPJS registration requirements for all contractor workers.					
Correction (filled by organization audited): The company will coordinate with all contrators, they should register immediately its workers on BPJS (work accident and health).					
Corrective Action (filled by organization audited): Inter-Office Mail from BPE Senior Manager to all contractor no 001/SPK Kontraktor/XII/2018 dated 17 December 2018, subject: additional clause on the agreement regarding BPJS registration for all contractor workers.					
Assessor Evaluation and Conclusion (filled by auditor): Verification on December 6, 2018 The company shows evidence of improvement as follows: 1. <i>SPK No 013/Potong Rumput/BSC-SPF/VI/2018</i> dated june 5, 2018 with Reci Ricardo for lawn mowing work in the factory area and staff housing. Article 7 paragraph (3) explains that the contractor is obliged to register its members in the <i>BPJS Ketenagakerjaan</i> and <i>BPJS Kesehatan</i> . 2. Proof of payment of the Employment BPJS through a virtual account for 1 person through a bank dated 29 November 2018. 3. Proof of payment of the BPJS Employment through a virtual account for 4 people through a bank dated November 29, 2018.					
Auditor Conclusion					

There is no evidence that all contractor workers are covered by occupational accident insurance and occupational health insurance.

Verification on December 17, 2019

The company shows some evidence of improvement, such as:

1. Proof of payment of *BPJS Kesehatan* for 4 people (a.n. Toni Hidayat, Mita Deskaryani, Wahyu Dwi Setiawan, Ilham Tri Saputra) with payment code: 8888802619734567 dated 17 December 2018.
2. Inter Office Mail from the Manager of PT BSC to all Contractors No. 001 / SPK Contractor / XII / 2018 dated December 17, 2018, Subject: Clausal SPK Registration of Workers The contractor is a participant in *BPJS Ketenagakerjaan* and *BPJS Kesehatan*. There are 4 main points:
 - a. Addition of SPK article regarding the registration of contractor labor to become a member of the *BPJS Ketenagakerjaan* and *BPJS Kesehatan*
 - b. Report all workers without exception so that employment and health insurance can be obtained by workers.
 - c. Proof of deposit of the *BPJS Ketenagakerjaan* and *BPJS Kesehatan* must be reported to the company where the employment contract is signed to ensure that the contractor has registered the workforce.
 - d. If this deposit slip is not handed over to the company, the SPK that has been jointly signed is legally null and void.

Auditor Conclusion

Please show the registration and payment records of the *BPJS Ketenagakerjaan* and *BPJS Kesehatan* for each contractor employee at SPE, BPE and SPF (other than the lawn mowing contractor at Mill).

Verification on July 24, 2019

The company provides additional evidence in the form of:

1. Work agreement letter No.003 / Replanting / BSC / VI / 2018 dated June 29, 2018 between PT BSC and PT Mitra Karya Jaya Perdana in article 9 regarding insurance, among others, states that *BPJS Ketenagakerjaan* of workers is the burden of the second party entirely.
2. Details of PT MKJP labor contributions for the July 2019 reporting period for 16 PT MKJP workers - there is no proof of payment for the details of the contributions.
3. Evidence of Paying *BPJS Kesehatan Keluarga* named of Reza Firdaus in July 2019 (One of the employees of PT MKJP)

Based on interview with one of the PT MKJP representatives revealed that the total number of workers was 25 people. The results of interviews with the head of Muara Rengas Village, there are citizens who become one of the contractors for the EFB application.

The company has not been able to show:

1. Identification of all contractors working with PT BSC (SPE, SPF, BPE) along with a list of all contractor workers.
2. Records of *BPJS Ketenagakerjaan* and *BPJS Kesehatan* registration and payment for each contractor employee at SPE, BPE and SPF.

Thus the non-conformity is stated as not yet fulfilled.

Verification on October 23, 2019

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

1. Identification of the contract, list of contract workers, and *BPJS* membership status of the contracted staff renewed September 2019. The information contained in the identification results include PT BSC in collaboration with 2 business entities and 2 individuals in the case of partial work.
PT Mitra Karya Jaya Persada → 10 people

CV Duta Bumi Abadi → 3 people Individuals - Yus Ely and Rici Ricciardo	
2. Evidence has been shown that these third party workers have been included in the BPJS Employment program	
However, there is no information on membership status in health insurance / BPJS Health especially for PT MKJP and CV DBA workers. Thus the nonconformity was declared not yet fulfilled.	
Verification on October 24, 2019	
Added evidence of improvement in the form of membership status and sample BPJS Health payments for DBA CV workers. Based on the analysis of the root causes, corrections and corrective actions the non-conformity is declared fulfilled. The consistency of the corrective actions and the implementation of the corrected evidence submitted will be verified again at the next assessment (Observation).	
Verified by	: Trismadi N & Haikal R Kharismansyah

<i>NCR No.</i>	: 2018.06	<i>Issued by</i>	: Andi Pratama Pasaribu
<i>Date Issued</i>	: 5 October 2018	<i>Time Limit</i>	: 3 January 2019
<i>NC Grade</i>	: Major	<i>Date of Closing</i>	: 18 December 2018
<i>Standard Ref. & Requirement</i>	5.7.2 The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform: <ul style="list-style-type: none">• Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures.• Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually.• Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.• Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.		
Evidence observed (filled by auditor): Based on document verification the company have no been able to show transaction record on the RSPO IT Platform which informed the shipping announcement, tracing, removing stock and others. While in accordance to interview with related staff sighted that RSPO product sales is authority of Marketing Department in Head Office Jakarta.			
Non-Conformance Description (filled by auditor): The company can't demonstrate all transaction on RSPO IT Platform.			
Root Cause Analysis (filled by organization audited): All of sales document available in Head Office Jakarta.			
Correction (filled by organization audited): The management unit will coordination with Marketing Jakarta related to RSPO IT platform.			

Corrective Action (filled by organization audited):

RSPO certified product sales will be available on the SPF.

Assessor Evaluation and Conclusion (filled by auditor):

Verification on 14 November 2018

The company was shown transaction record of CPO with ID No. TR-ffd0fd52-a6bd (Seller Ref. 00396/00375/04/18/L-BSC-MKS) sold to PT. Golden Hope Nusantara dated 30 April 2018 amount 3,187.66 MT.

Verification on 18 December 2018

Based on mass balance data twelve month before audit sighted that:

Product	RSPO Claim (MT)	Sold as Conventional (MT)
CPO	3,187.66	9,126.94
PK	-	2,550

Based on above explanation, this NCR was closed.

Verified by : **Trismadi N&Andi Pratama Pasaribu**

<i>NCR No.</i>	: 2018.07	<i>Issued by</i>	: Andi Pratama Pasaribu
<i>Date Issued</i>	: 5 October 2018	<i>Time Limit</i>	: 3 January 2019
<i>NC Grade</i>	: Major	<i>Date of Closing</i>	: 18 December 2018
<i>Standard Ref. & Requirement</i>	: 5.9.1 The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements		
Evidence observed (filled by auditor): There is no record keeping of SCCS.			
Non-Conformance Description (filled by auditor): There are no accurate, complete, up to date and accessible records in accordance to RSPO SCCS requirement.			
Root Cause Analysis (filled by organization audited): Book Keeping SCCS is made by the Head of Administration of SPF, however there is a change at the beginning this year and is not resumed by the successor.			
Correction (filled by organization audited): The company always makes accurate, complete and up to date records of SCCS in accordance to requirement.			
Corrective Action (filled by organization audited): RSPO certified product sales will be available on the SPF.			
Assessor Evaluation and Conclusion (filled by auditor): Verification on 14 November 2018 The company was shown Mass Balance period of September to October 2018. There are CPO sales with ID No. TR-ffd0fd52-a6bd (Seller Ref. 00396/00375/04/18/L-BSC-MKS) sold to PT. Golden Hope Nusantara dated 30 April 2018 amount 3,187.66 MT.			

Verificaiton on 18 December 2018

The company was shown mass balance record twelve month before audit period, as follows:

Month	FFB Received	FFB Processed	CPO Produced	PK Produced
September 2017	5,547.53	5,542.74	1,227.03	277.20
October 2017	6,108.64	6,053.01	1,314.33	266.57
November 2017	5,585.36	5,610.14	1,287.03	262.36
December 2017	5,480.21	5,352.78	1,198.50	263.31
January 2018	5,154.16	5,260.24	1,197.07	290.73
February 2018	3,432.42	3,416.50	760.12	166.13
March 2018	3,521.64	3,492.24	743.50	160.61
April 2018	4,145.76	4,171.59	876.18	193.12
May 2018	5,056.14	5,123.16	1,060.16	222.74
June 2018	4,320.25	4,325.68	871.67	179.53
July 2018	8,393.02	8,183.57	1,687.69	347.78
August 2018	8,241.79	8,395.43	1,789.62	382.87
Total	64,986.92	64,927.07	14,012.89	3,012.93

There are CPO and PK sales during this period with volume as:

Product	RSPO Claim (MT)	Sold as Conventional (MT)
CPO	3,187.66	9,126.94
PK	-	2,550

Based on above explanation, this NCR was closed.

Verified by : **Trismadi N & Andi Pratama Pasaribu**

<i>NCR No.</i>	: 2018.08	<i>Issued by</i>	: Andi Pratama Pasaribu
<i>Date Issued</i>	: 5 October 2018	<i>Time Limit</i>	: 3 January 2019
<i>NC Grade</i>	: Major	<i>Date of Closing</i>	: 18 December 2018
<i>Standard Ref. & Requirement</i>	D.5.1 The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis.		
Evidence observed (filled by auditor): There are no record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three monthly basis.			
Non-Conformance Description (filled by auditor): There are no record of SCCS with a three monthly basis.			

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

The company always makes accurate, complete and up to date records of SCCS in accordance to requirement.

Correction *(filled by organization audited):*

Revision the mass balance document with 3 monthly basis data.

Corrective Action *(filled by organization audited):*

The company will be record of mass balance document with 3 monthly basis by Head of Administration

Assessor Evaluation and Conclusion *(filled by auditor):*
Verification on 14 November 2018

The company was shown Mass Balance period of September to October 2018. There are CPO sales with ID No. TR-ffd0fd52-a6bd (Seller Ref. 00396/00375/04/18/L-BSC-MKS) sold to PT. Golden Hope Nusantara dated 30 April 2018 amount 3,187.66 MT.

Verificaiton on 18 December 2018

The company was shown mass balance record twelve month before audit period, as follows:

Month	FFB Received	FFB Processed	CPO Produced	PK Produced
September 2017	5,547.53	5,542.74	1,227.03	277.20
October 2017	6,108.64	6,053.01	1,314.33	266.57
November 2017	5,585.36	5,610.14	1,287.03	262.36
December 2017	5,480.21	5,352.78	1,198.50	263.31
January 2018	5,154.16	5,260.24	1,197.07	290.73
February 2018	3,432.42	3,416.50	760.12	166.13
March 2018	3,521.64	3,492.24	743.50	160.61
April 2018	4,145.76	4,171.59	876.18	193.12
May 2018	5,056.14	5,123.16	1,060.16	222.74
June 2018	4,320.25	4,325.68	871.67	179.53
July 2018	8,393.02	8,183.57	1,687.69	347.78
August 2018	8,241.79	8,395.43	1,789.62	382.87
Total	64,986.92	64,927.07	14,012.89	3,012.93

There are CPO and PK sales during this period with volume as:

Product	RSPO Claim (MT)	Sold as Conventional (MT)
CPO	3,187.66	9,126.94
PK	-	2,550

Based on above explanation, this NCR was closed.

Verified by : **Trismadi N & Andi Pratama Pasaribu**

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

<i>NCR No.</i>	: 2019.01	<i>Issued by</i>	: Haikal R Kharismansyah
<i>Date Issued</i>	: 25 July 2019	<i>Time Limit</i>	: 24 October 2019
<i>NC Grade</i>	: Major	<i>Date of Closing</i>	: 21 October 2019
<i>Standard Ref. & Requirement</i>	: 2.1.1 Evidence of compliance with relevant legal requirements shall be available.		
Evidence observed (filled by auditor): 1. Based on field observation to block I22 division 3 BPE found that there was one fertilizer who did not have a working agreement with the company. - Based on the interviews it was found out that the worker received half the wages from the <i>SKU</i> workers who were assisted (according to the agreement of both parties) - -Based on the document review of the employee registration document and the <i>BKM</i> foreman the names of assisted workers are indeed not registered- - Law No. 13 of 2003 article 50 states that employment relations occur because of an employment agreement between the employer and the worker / laborer - IOM Number 12 / BPE / VII / 2019 dated July 23 from the leadership of PT BSC (EM BPE, EM SPE, and EM SPF) about not being able to employ workers outside of <i>SKU</i> and contracts • Based on the employee list of Sungai Pinang Estate, Bukit Pinang Estate, and Sungai Pinang Factory it is known that the composition of the workforce is <i>SKU</i> and <i>PKWT</i> • Kepmen 100 of 2004 article 13 concerning <i>PKWT</i> registration states that <i>PKWT</i> must be recorded by the entrepreneur to the agency responsible for the local regency / city manpower no later than 7 (seven) days after signing.			
Non-Conformance Description (filled by auditor): Thus it can be concluded that the Company has not been able to show consistency in meeting relevant legal requirements such as Law No. 13 of 2003 and Kepmen No100 of 2004.			
Root Cause Analysis (filled by organization audited): 1. Not yet fully understood the application of Law No. 13 of 2013 Article 50 properly by supervision and employees 2. The delay in <i>PKWT</i> discharging from Manpower Office is due to the management of <i>PKWT</i> recording from Manpower Office being carried out by an administrator (Company PSD).			
Correction (filled by organization audited): 1. Conducted socialization to all supervision and employees regarding the application of Law No. 13 of 2013 Article 50 (attached document) 2. <i>PKWT</i> is recorded to the Manpower Agency of all units (Document attached)			
Corrective Action (filled by organization audited): 1. Daily attendance is done to workers who will work in the field together with morning activities (briefings) and supervision in the field by supervision so that workers who work in the field are workers who have official ties with the company (registered). If there are workers whose names are not recorded in the Overseer's Activity Book, they will be sent home. 2. Arrangement of reporting for <i>PKWT</i> recording to the Manpower Office is carried out by each unit responsible for the head of each unit			
Assessor Evaluation and Conclusion (filled by auditor):			

Verification is October 21, 2019

The company shows evidence of improvements in the form of:

1. Dissemination to SPF, SPE, and BPE employees conducted in September 2019 regarding the prohibition on the use of workers outside of SKUs and contracts. In the socialization, they said that every worker must have a working relationship with the company
2. Examples of absenteeism at morning briefing for all employees which include providing information about employee status as well as completeness of PPE
3. Memorandum Number 12 / BPE / VII / 2019 from the leadership of PT BSC to all managers and staff about not being able to employ workers outside of SKUs and contracts. The level of supervision must really ensure that every employee who works has a working relationship with the company
4. Recording of PT Bina Sains Cemerlang's PKWT staff to the Musi Rawas Regency Manpower Office through letter Number 166 / BSC-SPF / X / 2019 dated 04 October 2019. The letter has 10 sheets of attachments and includes all PKWT personnel from SPF, SPE, and BPE.

Based on the analysis of the root causes, corrections, and corrective actions the nonconformities are stated to have been fulfilled. Implementation and consistency of the improvements given will be observed again at the next evaluation.

Verified by : **Haikal Ramadhan Kharismansyah**

<i>NCR No.</i>	: 2019.02	<i>Issued by</i>	: Satria Adi Putra
<i>Date Issued</i>	: 25 July 2019	<i>Time Limit</i>	: ASA 1.3
<i>NC Grade</i>	: Minor	<i>Date of Closing</i>	:
<i>Standard Ref. & Requirement</i>	: 4.1.2 Checking or monitoring of operations procedures is conducted at least once a year.		
Evidence observed (filled by auditor): Based on document review, it is known that the company has shown records related to internal audit results, among others conducted by Minamas Research Center (MRC), Plantation Advisory, Mill Advisory, GCAD (Group Corporate Assurance Department) and RSPO / ISPO Internal Audit. The company has shown a Replanting Work and Report Card document for Replanting activities in 2018 which includes reviewing the inspection of activities in accordance with standards including checking the quality of work, availability / completeness of PPE, consistency of PPE usage, availability of Operation Permit Letter, Inspection of Contractor's Residence, availability of health insurance BPJS and Employment, etc. The results of the field visit revealed that there were solar tanks and solar storage facilities in the traction housing (replanting contractors) that were not in accordance with the standards.			
Non-Conformance Description (filled by auditor): However, the company has not been able to show internal audit activities that review the examination or monitoring and evaluation according to procedures for all work involving third parties according to RSPO Standard.			
Root Cause Analysis (filled by organization audited): Audit activities on the contractor's work have been carried out, but have not specifically audited the work of the contractor			
Correction (filled by organization audited): An audit of the contractor's work is carried out and reports are submitted such as : 1. Inspection of housing cleanliness and OHS 2. Check the quality of replanting work according to the specifications of the Work Agreement			

Corrective Action (filled by organization audited):

An audit of the work and the application of OSH to the contractor is carried out when the payment process will be carried out

Assessor Evaluation and Conclusion (filled by auditor):

Verification 30 October 2019

The company has shown evidence of improvements including:

- OHS Facilities and Infrastructure Inspection Report on the contractor of PT MKJP on 18 September 2019. The results of the inspection include an assessment of conditions, suggestions for improvement and dateline as well as the realization of the improvements.
- Inspection report on the quality of mowing on July 1, 2019 with the inspection parameters including compliance with OSH, quality of work such as the factory environment area, waste area, reservoir area and staff housing area
- Inspection of replanting work for PT Mitra Karya Jaya Perdana (MKJP) on August 20, 2019 which included reviewing the inspection of activities in accordance with standards including checking the quality of work.

Based on the evidence provided, the auditor still requires other additional data such as:

- Are there intervals / timeframes that are carried out to carry out the examination or monitoring and evaluation, is there a procedure?
- There has been no improvement to the fulfillment of APAR, first aid kit, construction of fences for fuel tanks as well as containers for storage of fuel droplets in diesel tanks in Housing while the deadline for completion on October 20, 2019. Has there been an evaluation related to the corrective actions? This is also a discrepancy found during field visits.

Based on the evidence of corrections that have been sent, the non-conformity No. 2019.02 declared unfulfilled.

Verified by : **Satria Adi Putra**

NCR No.	: 2019.03	Issued by	: Haikal R Kharismansyah
Date Issued	: 25 July 2019	Time Limit	: 24 October 2019
NC Grade	: Major	Date of Closing	: 06 August 2019
Standard Ref. & Requirement	: 4.7.2 A documented risk assessment shall be available and its implementation shall be recorded.		

Evidence observed (filled by auditor):

- SPE work accident report found out that in March 2019 there was a work accident that exposed to stones when doing grass cutting with a machine. The category of accidents is 5 (accidents that involve hospitalization). Missing work hours are 54 hours.
- Quarterly SPE P2K3 report 1 (January - March 2019) states that work accidents in the January - March 2019 period are Zero - There has not been any discussion and evaluation of work accidents in mowing cutting grass with machine.
- The May 2019 SPE and BPE HIRAC documents on the grass cutting section have not analyzed the risk of eye injury and control.

Non-Conformance Description (filled by auditor):

Thus it can be concluded that HIRAC owned by the company has not fully accommodated the evaluation results of

workplace accidents.
Root Cause Analysis <i>(filled by organization audited):</i> There has not been a routine evaluation related to HIRAC documents concerning work implementation and accident history
Correction <i>(filled by organization audited):</i> 1. Adding HIRAC for Mechanical Cicle Work activities - Stick Blower and Grass Cutting Increasing the risk of injury to the work of cutting grass using tools (Control using glasses)
Corrective Action <i>(filled by organization audited):</i> PSQM staff and OHS experts Evaluate HIRAC documents once a year by anticipating accident events based on accident history and potential unidentified hazards.
Assessor Evaluation and Conclusion <i>(filled by auditor):</i> Verification on August 5, 2019 The company shows evidence of improvements in the form of HIRAC renewal for the Bukit Pinang Estate and Sungai Pinang Estate which have identified the risk of injury when cutting grass using tools. The HIRAC update also addresses new work (pruning with machines / cantas). However information has not been shown in the root cause analysis, correction, and corrective actions. Non-conformity is stated as not yet fulfilled Verification on August 06,2019 Information has been added to the root cause analysis, correction, and corrective actions sections. Non-conformities are declared fulfilled.
Verified by : Haikal Ramadhan Kharismansyah

<i>NCR No.</i>	: 2019.04	<i>Issued by</i>	: Haikal R Kharismansyah
<i>Date Issued</i>	: 25 July 2019	<i>Time Limit</i>	: 24 October 2019
<i>NC Grade</i>	: Major (Recurring)	<i>Date of Closing</i>	: 06 August 2019
<i>Standard Ref. & Requirement</i>	4.7.3. Records of Occupational Health and Safety (OHS) program (see 4.8) and Personal Protective Equipment (PPE) training in accordance with the result of hazard identification and risk analysis shall be available to all workers.		
Evidence observed (filled by auditor): <ul style="list-style-type: none">• The company already has the Personal Protective Equipment SOP No. 10 / BSC-PSQM-ESH / 16 dated July 1, 2017, point 3.4. Investigation of PPE replacement stating "PPE that is damaged before the age of use will be replaced if an investigation has been carried out".• Corrective action of non-conformity in the previous assessment stated monitoring of the use of PPE and PPE Conditions every month by the OHS Expert. The company has shown a checklist of personal protective equipment for BPE and SPF that explains the condition and completeness of PPE. The examination results			

in June 2019 showed that for BPE there were some damaged PPE but not followed up, while for the SPF it showed that all PPE were in good condition.

- The company has shown records of PPE granting for workers such as masks, goggles, aprons, boots and gloves for the spray team as well as the SPE and BPE fertilizer team for the 2018 period conducted in June. In addition, there was also a handover of shoes (safety krisbow) for all SPF employees for the 2019 period conducted in January.
 - Field visits in Block I022 division III BPE showed that fertilizer worker boots were not provided by the company and the apron was torn. Interviews with workers revealed that there was no PPE storage area so they were taken home.
 - Field visits on Block E07 SPE show that the boots used are private property because the rations from the company have been damaged
 - Based on field visit at the SPF Engine Room station shows that the safety shoes used are in a damaged condition (the footprint is broke).
 - Based on field observation to the SPF Kernel Station showed that workers brought ear muffs but were not used, the safety shoes that were used in the tread section were damaged and were private procurement (ration of the safety boots provided by the company was stored).
 - Based on field visit to the BPE BSS and BMS house obtained information from the responsible BSS that the number of workers who entered on that day numbered 10 people while 2 others did not enter. Of the 12 available lockers, 10 lockers containing clean clothes 1 empty locker and 1 other containing uniforms and masks (PPE workers who do not enter are not stored in the BSS locker).
 - Based on field observation to SPE BSS and BMS house obtained information that five spraying workers were absent. The only PPE that is stored are aprons and plastic gloves, while no other PPE is found such as masks, boots, and glasses.
3. Based on the document review, field visits and interviews related to the operator's license are known that:
- Corrective action (non-conformity) in the previous assessment states that the General OHS Expert in each unit will monitor the validity period of the SIO. The determination of the operator's position at each station will be adjusted to the capabilities and competencies, referring to the data from the monitoring results of the operator license validity period.
 - SPF has not monitored yet license for engine room operator.
 - Based on interview with the engine room operator known it has never been attend OHS training.
 - Minister of Manpower Regulation number 38 of 2016 concerning Power and Production Machine states :
Article 110: Operation of Power and Production Machine is carried out by OHS operators in the field of Power and Production Machine.
Article 111: OHS operators include first movers, machine tool and production operators; furnace operator
Article 113: Initial driving operators include combustion motor operators, steam turbines, water turbines, gas turbines and windmills.

Non-Conformance Description (filled by auditor):

1. The company has not been able to show evaluations and ensure the effectiveness of the corrective actions in the prior assessment so that inconsistencies in the implementation of the occupational health and safety program are still found.
2. The company has not been able to ensure the effectiveness of corrective actions in the previous assessment so that not all operators that are required to be equipped with a license have been identified.

Root Cause Analysis (filled by organization audited):

Point 1 :

- There is still a lack of awareness of workers to use PPE

- There is still a lack of supervision control over the use of employee PPE
- Lack of confirmation from supervision to supervise the use of PPE before starting work activities, during work activities and after work activities such as PPE storage
- Ineffective monitoring of the use of PPE and PPE Conditions every month carried out by the general AK3 due to the period of inspection period that is too long (once a month)

Point 2 :

The identification of operator training needs has not run consistently

Correction *(filled by organization audited):*

Point 1 :

- Monitor the use of PPE and PPE conditions daily which is done at morning briefing by the foreman and the Assistant Division
- Give strict sanctions to employees who do not orderly use PPE when leaving, at work and coming home from work in accordance with PT BSC internal management memo
- Storage of PPE fertilizer and spray workers must be placed at house of BSS / BMS that has been provided
- Replace damaged PPE and complete worker PPE that is incomplete

Point 2 :

- Conduct training for operators who do not have a K3 license

The unit consistently identifies training needs for each employee, especially those bound by mandatory regulations

Corrective Action *(filled by organization audited):*

Poin 2 :

Daftar semua operator yang dipersyaratkan memiliki lisensi K3 di SPF dan bukti daftar pada PJK3 untuk operator diikutkan pelatihan

Point 1 :

- Document evidence of monitoring the use of PPE and checking the PPE conditions of employees, PKWT and contractors whose attendance joins in foreman absent
- Disseminating Memos related to emphasizing the use of PPE to all workers
- Evidence of PPE handover for damaged and incomplete workers
- Make a daily PPE checklist that is carried out by the foreman examined assistant / senior assistant and approved by the manager
- Make a checklist of transfer of PPE return (Fertilizer and Spray Workers) to the BSS / BMS home. The person responsible is the BSS / BMS house keeper

Point 2

The list of all operators required to have a OHS license at the SPF and proof of the list on *PJK3* for operators is included in the training

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

Verification on July 31,2019

The company shows evidence of improvements in the form of:

- Daily PPE checklit of Sungai Pinang Estate dated 26 and 27 july 2019 which in the checklist has explained the following criteria:

PPE Type:

A: Safety Hernest; B: Shoes; C: Gloves; D: Mask; E: Glasses; F: Apron; G: Earmuff / Earplug; H: Welding mask; I: Dodos Safety Gloves; A: Ax Holster; K: Egrek Safety Gloves

- Completeness:

B: Good Condition; R: Damaged Condition; and H: Lost

- PPE procurement plan for the clinical team in the form of safety shoes, medical shoes, masks, and rubber gloves in accordance with an internal purchase request EST / SPE / DIV-KS / 2019 / VII / 02 dated July 27, 2019 which was approved by the SPE Estate Manager
- Investigation of SPE Personal Protective Equipment Damage for clinical teams with damaged PPE results due to the use of proposals immediately replacing them
- Socialization of the use of PPE for the clinical team. Socialization of PPE usage for all SPE employees including contractor
- Socialization of PPE memorandum for SPF, SPE, and BPE
- Memorandum Number 018. Special / VII / 2019 dated July 26, 2019 concerning Response to the Use of Personal Protective Equipment including stating the obligation to check PPE every day and investigate if any PPE is damaged
- Monitoring SIO Operator SPF 2019
- Certificate of registration for training No: 512 / SK / AP / VII / 2019 from PT Arpindo Pratama to M.Sidik and Somantri for Diesel / Genset Motor training

However not yet shown:

- Information regarding follow-up of field findings when ASA-1.2 was carried out such as PPE for fertilizer and spray workers that have not been stored in the BSS locker and field visits in block I022 division III BPE, block E07 SPE, and SPF
- Supervision of compliance with PPE usage (PPE has been given to the workplace but not used)

In addition, additional information about root causes, corrections and corrective actions is needed.

Audior Conclusion

Field verification is needed to ensure the implementation and consistency of the implementation of occupational health and safety programs

Non-conformity is stated as not yet fulfilled

Major Verification on August 5, 2019

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

Sungai Pinang Factory :

- Equipment (PPE) from 27 July 2019 to 05 Agustus 2019 made by the Overseer and examined by the Senior Assistant / Station Assistant and known by the mill manager.
- There is evidence of a warning letter from the mill manager dated July 27, 2019 Number BSC / FM-Kary / 29/07/144 to the process foreman because on that date the PPE did not use the company, the Earmuff was brought but not worn and the safety shoes worn were already broken (company given safety shoes)
- Statement letter dated July 27, 2019 from the foreman of the process (NIK 43314) regarding acknowledging the violation, namely disorderly use of PPE

Sungai Pinang Estate

- Daily Monitoring of the Use of Personal Protective Equipment (PPE) from 27 July 2019 to 05 Agustus 2019 made by the Overseer and examined by the Senior Assistant / Station Assistant and known by the mill manager.
- Investigation of PPE damage reports for two fertilizer members on behalf of Rasmini and Tusiya on 29 July 2019

- Requests for Internal Purchases from assistant division III SPE Number EST / SPE / DIV-III / 2019 / PPI / 38 of which are for purchasing aprons (25 pieces); Fertilizer masks (11 pieces); Measuring bowl of fertilizer (11 pieces); spray masks (5 pieces) and rubber gloves (25 pieces)

Bukit Pinang Estate

- Daily Monitoring of the Use of Personal Protective Equipment (PPE) from 27 July 2019 to 05 August 2019 made by the Overseer and examined by the Senior Assistant / Station Assistant and known by the mill manager.
- Investigation of PPE damage on 24 July 2019 a.n Siti (apron damage due to work). It has been replaced with a good apron on July 24, 2019.

SPE, SPF dan BPE

Examples of PPE damage reporting forms with those describing:

Section A: Employee Name; Type of work; Garden; Type of PPE; Division; Damage type

Part B: Description of the cause of the damage

Part C: Recommendations for replacement

Verificarion on August 06, 2019V

Based on the interviews and field observations to block I10 Division II and Block G08 Division II SPE, block G18 Division II and block I22 division III, as well as the engine room, sterilizer, kernel, and SPF boiler stations, the following facts were found:

SPE

- Block I10 division II (Spray activity): A total of 20 spray workers; 15 people entered and 5 people did not enter. PPE that is used entirely in good and complete condition such as boots, glasses, masks, aprons, and rubber gloves
- Block G08 division II (Fertilizer activity): Total manpower of 15 people; 4 people entered; 11 does not enter. PPE that is used entirely in good condition such as glasses, masks, boots, and aprons
- BMS and BSS houses: The number of PPE saved is in accordance with the number of workers who are not present. Available PPE storage lockers and recording PPE handover after work to the BSS / BMS house keeper

BPE

- Block G18 Division II (Spray Activity): A total of 14 spray workers. PPE that is used entirely in good and complete condition such as boots, glasses, masks, aprons, and rubber gloves
- Block I22 Division III (Fertilizer Activity): A total of 8 PPE fertilizer workers used entirely in good condition such as glasses, masks, boots and aprons
- BMS and BSS houses: APD storage lockers and recording of PPE handover after work for BSS / BMS house keepers

SPF

- Sterilizer: PPE in complete condition
- Engine Room: PPE in complete condition
- Boilers: PPE in complete condition
- Certificate of registration training No: 512 / SK / AP / VII / 2019 from PT Arpindo Pratama on behalf of M.Sidik and Somantri for Diesel Motor / Genset training - Based on information from the PSQM staff communication has been made to the training providers that the training provided referred to is the initial mover operator as referred to in Permenaker No. 38 of 2016 concerning Power and Production Plane.

Based on the analysis of the root causes, corrections, corrective actions and verification of the field the discrepancies

are declared fulfilled. The consistency of the implementation of the improvement plan will be verified again in the next assessment

Verified by : **Haikal Ramadhan Kharismansyah**

NCR No.	: 2019.05	Issued by	: Trismadi N
Date Issued	: 25 July 2019	Time Limit	: ASA 1.3
NC Grade	: Minor	Date of Closing	: 21 October 2019
Standard Ref. & Requirement	5.2.4. Once the management plan is prepared, continuous monitoring documentation and report regarding the status of the RTE and HCVs are affected by the operations of the plantation and palm oil mill shall be available, and the results of monitoring are to be used to follow-up on the improvement of the management plan.		
Evidence observed (filled by auditor): The certification unit shows the HCV management and monitoring program as follows: <ul style="list-style-type: none"> - Don't do the overthrow of the principal within 50 meter and tagging of yellow paint. - Installation of boundary stakes with a distance of 50 meter. - Installation of notification and prohibition signboard for hunting and cutting in the buffer zone area. - Planting tree or bamboo seedling in accordance with recommendation of HCV identification documents. - Wildlife monitoring and plants monitoring every semester. There has been realized from above programs, such as: <ul style="list-style-type: none"> - Installing a signboard of prohibition spraying on riparian zone. - Planting and rehabilitating the riparian zone of Pinang River, Hitam River, and Durian River. - Routinely patrols has been conducted every month - Wildlife and plants monitoring every semester. 			
Non-Conformance Description (filled by auditor): However there are no evaluation and follow up of the results of RTE species monitoring result, as recommendation of next management plan.			
Root Cause Analysis (filled by organization audited): An evaluation and follow up has not been made on the result of monitoring the presence of RTE species, due to the change in unit leadership.			
Correction (filled by organization audited): Completed evaluation and follow up to the result of monitoring the existence of RTE species.			
Corrective Action (filled by organization audited): The results of the evaluation and follow up on the result of monitoring of the presence of RTE species, and as well as: <ul style="list-style-type: none"> b. Monitoring schedule of existence of RTE species by PIC. c. Procedure for monitoring the existence of flora and fauna. 			
Assessor Evaluation and Conclusion (filled by auditor): Verification on 6 September 2019 The company showed an evaluation of the management and monitoring of HCV for the period 2018-2019, which explained that the types of mammals: <i>Siamang, trenggiling, landak</i> ; Aves: <i>cipoh daun, burung madu, pijantung</i> ,			

kelingsap, ciung air coreng, and kipasan belang. While pelanduk dada putih that were not found during the last observation in April 2019.

Future HCV Management Programs include: planting of plants (enrichment species) in river borders with types: *kondang, tampuy, jambu-jambu, kayu ara, etc.*

Verification on October 21, 2019

The company shows some evidence of improvement as follows:

1. SOP Monitoring the existence of flora and fauna No. SPO / 028 / BSC / 2012 Revision No. RSPO / 01. / PKSFF dated July 1, 2019, explained that monitoring is done every semester, officers who carry out according to the appointment, direct observation using the transect method, and interviews to employees or the community regarding the presence of protected animals or plants in the plantation area and surrounding areas.
2. Planting programs on the river border in the second semester of 2019 totaling 270 plants.
3. Realiation of planting plants in the river border in the first semester of 2019 totaling 254 plants.

Auditor Conclusion:

Based on the evidence of improvement shown, this discrepancy is fulfilled. And will be observed again in the next assessment.

Verified by : **Trismadi N**

<i>NCR No.</i>	: 2019.06	<i>Issued by</i>	: Trismadi N
<i>Date Issued</i>	: 25 July 2019	<i>Time Limit</i>	: 24 October 2019
<i>NC Grade</i>	: Major	<i>Date of Closing</i>	: 21 October 2019
<i>Standard Ref. & Requirement</i>	: 5.3.2. There shall be evidence that all chemicals and their empty containers are disposed of responsibly.		
Evidence observed (filled by auditor): Based on field observations, sighted several fact as follows: <ol style="list-style-type: none">1. There is the use of oil drums and used chemical container as water containers in several housing complex (Division two BPE).2. There are 20 damaged knapsacks placed in the BMS house of SPE and one damage knapsack placed in the BSS House of BPE.			
Non-Conformance Description (filled by auditor): However the certification unit has not been able to demonstrate that all chemicals and their empty containers well manage in accordance to national regulations.			
Root Cause Analysis (filled by organization audited): <ol style="list-style-type: none">1. There is the use of oil drums and used chemical packaging (size 20 liters) as water storage in several houses (Pondok Division 2, BPE) this is caused by the presence of several new employees who do not understand about hazardous waste management.2. There are 20 damaged knapsacks placed in the BMS SPE house. 8 Knapsacks can still be used after repairing and 12 Knapsacks are in total damaged condition, then 1 damaged knapsack placed in the BSS BPE house can still be use after repairs.			

Correction <i>(filled by organization audited):</i> 1. Socialization to all unit employees regarding hazardous waste management / prohibition on the use of poison used packaging. 2. Knapsack damaged by the number of 12 pieces saved to hazardous waste store on SPF.	
Corrective Action <i>(filled by organization audited):</i> 1. Monthly housing inspection is carried out by the Division Assistant 2. Prepared a special place for broken knapsack that has not been repaired at BSS house and if it cannot be repaired again. It is immediately stored in hazardous waste store in SPF.	
Assessor Evaluation and Conclusion <i>(filled by auditor):</i> Verification on October 21, 2019 The company shows some evidence of improvement as follows: 1. Documentations of socialization activities regarding the prohibition of employing workers without agreements and the prohibition on using hazardous waste to 123 employees at SPE on September 13-16, 2019; to 120 employees at BPE on 4 - 7 September 2019; and to 37 employees at the SPF on September 16 & 24 2019. 2. Hazardous waste log book at SPF: gloves: 0.009 tons, oil: 0.791 tons, Chemical contaminated packaging (SPE): 0.6976 tons, TL lamp: 0.003 tons, used batteries: 0.100 tons, medical waste: 0.0152 tons, filter oil: 0.213 tons. 3. Minutes of submission of hazardous waste from SPE to SPF on October 1, 2019, consisting of used packaging materials: Basta: 4 pcs, Ken Up: 65 pcs, Capture: 188 pcs, kenly: 47 pcs, knapsack damaged: 12 pcs.	
Auditor Conclusion: Based on above explanations, this nonconformities has been closed.	
Verified by	: Trismadi N

NCR No.	: 2019.07	Issued by	: Trismadi N
Date Issued	: 25 July 2019	Time Limit	: ASA-1.3
NC Grade	: Minor	Date of Closing	:
Standard Ref. & Requirement	: 5.3.3. A documented waste management plan to avoid or reduce pollution and its implementation shall be available.		
Evidence observed <i>(filled by auditor):</i> 1. Based on SOP-BSC/07/2019 dated 1 July 2019 regarding waste management, including: garbage been that has been collected in the trash bin will be transported at least once a week, or twice a week by the transport to the landfill. Landfill is located far from water sources, its minimum > 500 meters from housing. There also not allowed to burn the housing waste, it is not justified to litter. 2. Based on field observations result to the landfill at block E07, Division 3, SPE known that the condition of the garbage is not dumped in the landfill (open dumping). 3. Based on document verification known that the infectious waste (medical waste) was carried out on 12 September 2018, with total 0.0095 MT. Where the shelf life of infectious waste on hazardous waste has exceeded 180 days, it's not in accordance to Government Regulation number 101 of 2014 article 28. Otherwise, based on field visit to			

the hazardous waste at SPF known that from 13 September 2018 till 18 July 2019, there were 0.0008 MT of medical waste.

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

However, the certification unit has not been able to show evidence that the waste management plan has been implemented in accordance to the procedure.

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

1. Delayed of landfill maintenance it becomes a bush and results in improper disposal of waste within the landfill due to the existence of road operational improvements.
2. Delayed in transporting of medical waste is caused by the small amount of waste that results in the shelf life of medical waste exceeding the shelf life requirements of medical waste.

Correction *(filled by organization audited):*

1. Improvement were made to the old landfill by hoading the collected rubbish and making a new landfill.
2. The third party transportation of hazardous waste is carried out.

Corrective Action *(filled by organization audited):*

1. Landfill condition is monitored at least once a month.
2. Hazardous waste management is carried out, especially medical waste in accordance to regulations, in this case monitoring is carried out by the head administration of SPF.

Assessor Evaluation and Conclusion *(filled by auditor):*
Verification October 21, 2019

The company shows some evidence of improvement as follows:

1. Documentation of landfill improvement on October 10, 2019, among others, road cleaning, garbage collection & cleaning, stockpiling of old landfill, making new landfill and installing new landfill signboards.
2. Hazardous Waste Management Cooperation Agreement No. 001 / TSJ / BSC / GPB / XI / 2019 dated October 1, 2019 between PT Tenang Jaya Sejahtera (beneficiaries / destroyers of hazardous waste), PT BSC (hazardous waste producers), PT Gema Putra Buana (hazardous waste transporters) and validity period of 1 year.
3. Decree of the Minister of Environment and Forestry of Republic of Indonesia No. S.25 / Menlhk / Setjen / PLB.3 / 1/2019 dated January 18, 2019; regarding: statement of the fulfillment of the commitment of PT Tenang Jaya Sejahtera's about Hazardous Waste Management Permit, treatment services by using incinerators and electrocoagulation for 5 years.

Auditor Conclusion:

The manifest of infectious hazardous waste transport has not yet been demonstrated, this nonconformities is still open.

Verification October 21, 2019

The company shows Hazardous Material Manifest Number: 0030008 by PT Tenang Jaya Sejahtera on October 23, 2019 for medical waste with a volume: 0.0147 Tons using a transport vehicle: B 9689 BXR.

Auditor Conclusion:

Based on the evidence of the above improvement, this nonconformities is fulfilled.

Verified by : **Trismadi N**

NCR No.	:	2019.08	Issued by	:	Brigitta Prita
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<i>Date Issued</i>	:	25 July 2019	<i>Time Limit</i>	:	24 October 2019
<i>NC Grade</i>	:	Major	<i>Date of Closing</i>	:	09 August 2019
<i>Standard Ref. & Requirement</i>	:	General Chain of Custody Clause 5.7.2. The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform: <ul style="list-style-type: none">Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures.Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually.Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.			
Evidence observed (filled by auditor): <ul style="list-style-type: none">Quota certified volume data for November 29, 2018 until September 10, 2019 on palm trace, CSPO 16,988 MT and CSPK 3,685 MT.CSPO & CSPK sales data for period July 1, 2018 - June 30, 2019:<ul style="list-style-type: none">CSPO sold conventionally amounted to 16,346 MT.CSPK sold conventionally amounted to 3,446 MT.Volume removed / credit allocations on the palm trace for CSPO: 15,000 MT and CSPK: 3,000 MT.Current remaining palm trace data during audit CSPO: 1,988 MT & CSPK: 685 MT.					
Non-Conformance Description (filled by auditor): Based on the data above, the company has not been able to show a reduction (removed stock) of CSPO Conventional sales of 1,346 MT and CSPK of 446 MT on palm trace.					
Root Cause Analysis (filled by organization audited): Lack of coordination and communication between unit and Marketing of Jakarta.					
Correction (filled by organization audited): Remove according to conventional sales data from the GTM and inform the unit.					
Corrective Action (filled by organization audited): Monitor and coordinate between the GTM and the unit to get sales data alignment.					

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

Verification, August 6th, 2019.

The company shows CSPO & CSPK remove data with details:

STOK Sebelum di Remove

Product	Program	Certified Volume*	Volume Sold/Removed*	Volume Allocated as Credits*	Remaining Volume*
CSPO	IP	16,988	0	15,000	1,988
CSPK	IP	3,685	3,000	0	685
FFB_estates	IP	77,900	0	0	77,900

STOK Setelah di Remove

Product	Program	Certified Volume*	Volume Sold/Removed*	Volume Allocated as Credits*	Remaining Volume*
CSPK	IP	3,685	3,446	0	239
CSPO	IP	16,988	0	16,346	642
FFB_estates	IP	77,900	0	0	77,900

However, based on palm trace data dated August 6, 2019, there is no volume reduction for CPO with the following details:

Stock Overview									
Member Information					License Information				
Member Name	Sime Darby Plantation - Sungai Pinang				License ID	CB75153			
Member ID	POM PT BSG RSPO_PO1000000316				Issued By	PT Mutuagung Lestari			
Member Country	INDONESIA				Issued On	24-12-2018			
Member Category	Oil Mill				Start Date	29-11-2018			
Core Product	S				End Date	16-08-2019			
License Status					License Status	Suspended			
Product	Supply Chain Model	Certified Volume*	Announced Volume*	Volume Allocated as Credits*	Volume Sold as Physical*	Volume Sold as Credits*	Volume Removed*	Remaining Certified Volume*	
CSPK	IP	3,685	0	0	0	0	3,446	239	
CSPO	IP	16,988	0	0	0	0	0	16,988	
FFB_estates	IP	77,900	0	0	0	0	0	77,900	

* Volumes in MT

Certified Volume* = Original Certified Volume + Carry Over Volume + Extended Volume

The statement explained that the volume removed for CSPK was 3,446 MT and the remaining certified volume for CSPK was 239 MT. Whereas CSPO were not removed and the remaining certified volume was still equal to 16,988 MT.

So based on the explanation above, this non-conformity is not fulfilled.

Verification, August 8, 2019.

The company shows remove stock data for August 8, 2019 in Palm Trace with details below:

Stock Overview									
Member Information					License Information				
Member Name	Sime Darby Plantation - Sungai Pinang POM PT				License ID	CB75153			
Member ID	RSPO_PO1000000316				Issued By	PT Mutuagung Lestari			
Member Country	INDONESIA				Issued On	24-12-2018			
Category	Oil Mill				Start Date	29-11-2018			
Core Product	S				End Date	10/02/2019			
License Status					License Status	Active			
Product	Supply Chain Model	Certified Volume*	Announced Volume*	Volume Allocated as Credits*	Volume Sold as Physical*	Volume Sold as Credits*	Volume Removed*	Remaining Certified Volume*	
CSPK	IP	3,685	0	0	0	0	3,446	239	
CSPO	IP	16,988	0	16,988	0	0	0	0	
FFB_estates	IP	77,900	0	0	0	0	0	77,900	

Based on the explanation above CSPO volume data has been removed by 16.988 MT so that the remaining stock is

currently at 0 MT.

Importans note:

- Please, when there is a conventional sale that has been fixed, CSPO / CSPK stock will be reduced. If the sales have not been fixed, then no stock reduction can be made for CSPO / CSPK. This will be noted in subsequent audits.
- Conventional sales data for the period of 1 July 2018 - 30 June 2019 amounted to 16,346 MT (Removed stock) so that the remaining volume should be 642 MT.

Verification, August 9, 2019.

The company showed a coordinating mechanism for monitoring CPO & PK stock sales between the PSQM Department and the Jakarta GTM Department dated April 1st, 2019, which was approved by the GSQM Indonesia Head of Sustainability. The mechanism explains that:

1. Dept. PSQM monitors CPO & PK sales stock at the Mill every 6 months.
2. Dept. PSQM coordinates with the Dept. GTM Jakarta regarding RSPO certified products sold on the Palm Trace IT platform every 6 months via email.
3. Dept. GTM Jakarta will remove RSPO certified volumes sold under other schemes that are sold conventionally or if there is a lack of production and informs them if there are certified volumes allocated as credit sales.
4. Dept. GTM Jakarta sends proof of products that have been removed or allocated as credit sales in the Palm Trace IT platform to the Dept. PSQM via Email.

Based on the explanation above, the non-conformity is stated to be fulfilled and will be observed during the next surveillance.

Verified by	:	Brigitta Prita
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3.5.3. Opportunity for Improvement

No	Ref. Std.	Description Deskripsi
1	7.3.1	The company to be consider to follow up on the Remediation and Compensation Plan Progress.

3.5.4. Noteworthy Positive Components

No	Description Deskripsi
1	Commitment to implemented the principle of sustainable palm oil development.
2	Have competent human resources to implement the principles of sustainable palm oil development.
3	Have obtain the PROPER BLUE in 2018.
4	Have obtain ISPO certificate
5	Mechanization in harvesting and transporting activities with a bin system, as well as mechanization of pruning & dishes.
6.	PT BSC was awarded the Zero Accident certificate from the Indonesian Minister of Manpower.

3.6 Summary of Arising Issues from Public and Auditor Verification.

Public Issues (Institution/ NGO/Community)	Auditor Verification
Manpower and Transmigration Agency Musi Rawas District <ul style="list-style-type: none"> Companies are still using <i>PKB 2015 - 2017</i> referring to <i>BKS PPS</i>. There has been no <i>PKB</i> renewal by <i>BKS PPS</i> There is no First Aid person in charge at the workplace OHS Committee of Bukit Pinang Estate hasnt been ratified yet Wages refer to the November 2018 Governor decision regarding the minimum wage of Musi Rawas Regency <p>OHS Committee report has has been regularly reported every three months</p>	<ul style="list-style-type: none"> <i>PKB</i> used by the company refers to the PPS BKS in the 2015-2017 period. As explained by the <i>PKB</i> authorities, it is stated that it is still valid until further updates. The company shows the Decree of Assigning Check Box of First Aid Box on July 2, 2018 to Mr. Pujiono with the main task of checking the completeness and availability of boxes and contents of First Aid Box boxes in good condition. There is a Decree of the Head of the South Sumatra Province Manpower and Transmigration Office Number: 04 / KPTS / NAKERTRANS / 2019 regarding the ratification of the management of occupational safety and health (OHS Committee) of PT Bina Sains Cemerlang Bukit Pinang Estate on July 22, 2019 Wages given by the company refer to South Sumatra Governor Decree Number 067 / KPTS / Disnakertrans / 2018 concerning Musi Rawas Regency Minimum Wage in 2019 on November 22, 2018. In the decree stated the minimum wage of Musi Rawas Regency is 2,944,681 Idr <p>OHS Committee quarterly reports are routinely carried out</p>
Plantation Agency <ul style="list-style-type: none"> The company has reported its business activities to the plantation agency routinely. There are no issues related fires. The company does not have new location permits. There is no environmental issues related to company's operational. The company has adequate facilities and infrastructure of fire and functioning properly. The Company has CSR program and partnered with local communities (Plantation Agency push the company to increase the CSR for community). Fire facilities and infrastructure already owned <i>Penilaian Usaha Perkebunan</i> (PUP) was carried out in 2018 and already approve by Bupati (Class II). Report progress on the plantation business routinely reported per semester Encourage companies to get ISPO certification. 	<ul style="list-style-type: none"> The company has had all plantation permit and has been complied all obligation reports. It refer to indicator 1.1.1. According to field observation, there are no environment pollution from estate and mill operational. Company has realized the assisstance to local communities based on needs of society that explained in the criteria 6.11.
Environment Agency of Musi Rawas Regency <ul style="list-style-type: none"> The company already has legality related to environmental issues such as environmental documents (EIA), land application permits, and hazardous waste warehouse 	<p>The Company has conducted regular reporting related to environmental management and waste management Quarterly Report has been explain at</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> The Company has conducted report of Environmental Management Plan – Environmental Monitoring Plan every semester, reports of liquid waste and hazardous waste management periodically. There have been environmental issues from the community, but verification has been done by officers from Environmental Body. The issue of the community is not in accordance with the conditions in the field. It is expected to follow up on the wide differences in Environmental Permits with Land Use Title owned by the company. There is no environment pollution issues. In accordance to Environment & Forestry Minister Regulation number 68 year of 2018, the company should have domestic water waste permit. Hazardous waste store license has been extended by company. 	<p>criterion 5.1 and 5.3</p> <p>The companies has planted of trees on the river banks and leave 50 meter from river bank did not replanting with palm oil tree and it has been explain criterion 4.4 and 5.2</p> <p>Head of one stop investment and integrated services, Musi Rawas Regency number 503/05/LB3/DPM-PTSP/V/2019 dated 31 May 2019. Regarding: extension of hazardous waste store permit of PT BSC. Located at coordinate: S: 03°08'06.1" and E: 103°07'05.5"; type of waste: used battery, used oil filter, used diesel filter, used oil drum, contaminated gloves, used paint/thinner cans, used grease buckets, used oil, used Tubular Lamp, contaminated rags, used resins, used printer cartridge, used jerry can, medical waste, used ink and use fertilizer sacks. There should be an alarm, fire fighting equipment, safety shower, eye washer, emergency response facilities and emergency SOP. The validity period is five years from this decision.</p>
<p>Anyar Village</p> <ul style="list-style-type: none"> The company existence had made a positive contribution to the community with the opening of transportation access, information, employment opportunities and business opportunities such as EFB applications. Land acquisition has following the national regulation or land acquisition procedure and also witnessed by the local government. The company has been helped the local community through the CSR program. There is no environment pollution issues. There is no issue of land disputes issues. There is no fire case issues. 	<ul style="list-style-type: none"> As written in criteria 6.11 As written in criteria 2.2 and 2.3 <p>As written in criteria 6.11</p>
<p>Muara Rengas Village</p> <ul style="list-style-type: none"> Communication between the company and the village has been better than in previous years. There is local people has been work at PT BSC. CSR provided by the company include the, mosques operational charity and food aid, road maintenance. Assistance is generally given after the submission of proposals from the village. There is no issue of land disputes issues. The Company has been socialized as related to the management of HCV in the areas of the company. And zero burning. There is no environment pollution issues. Scheme smallholders is on process, the company was 	<p>CSR program has been explain at criterion 6.11 no issue of land disputes and has explain 2.2</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
identified the land. Agreement system is still negotiate.	
<p>PT Mitra Karya Jaya Perdana</p> <p>The contractor collaborated with the company for 1.5 years for replanting activities at PT BSC and continues for the next 2 years (3.5 years of collaboration). The number of employees is 26 people, 6 have the status of probation employees (Newly entered work in the middle of June) so that the insurance of labor & health is in the management stage. PPE is provided by contractors in the form of helmets, vests and safety shoes.</p> <p>Housing is provided by PT BSC, available 5 doors with 1 door containing 6 people. Electricity and water are provided by PT BSC.</p> <p>Payment of the contractor is done every month, with <i>BAPP</i> then asked to Jakarta to be paid. Payment of replanting activities has been paid on time. Copies of the cooperation have also been kept by each party, both the company and the contractor.</p> <p>Code of ethics policy socialization has been socialized to PT MKJP and from the company manager. Cooperation relationships with contractors are well established.</p>	<p>Cooperation between the Company and the Contractor is well established.</p> <p>The company has empowered contractors around the company.</p>
<p>Gender committee of PT BSC</p> <p>So far there has never been a report related to sexual harassment. Employees have been notified of reporting procedures in the event of such a case. In each division, a gender committee member has been provided so that if there is a report, it can be through the member.</p> <p>Gender committee socialization activities have been carried out routinely by the gender committee in collaboration with the medical authorities. Female employees get H1 leave (2 days) if they are menstruating and H2 leave (1 ½ months before and after giving birth) if they are pregnant.</p>	<p>The company has socialized handling of sexual harassment. Employees already know about the reporting mechanism if there are complaints.</p>
<p>Head of labor union of Sungai Pinang Mill (Grading worker)</p> <p>Based on interviews with the union leaders, there are still 3 contract employees (<i>PKWT</i>) as helper at the process station who have not been appointed as permanent employees and have worked for 7 years. The contract extension is carried out every 6 months and the contract is terminated for 1 month and extended again. The chairman of the union has conveyed this to the Mill management representative but during now the employee company explanation is still in contract status.</p>	<p>This has been discussed with companies and labor unions. Because there is a break for 1 month and the contract is not renewed in succession, this does not violate company rules.</p>
<p>Transporter CPO & PK (CV Semanggus Indah Ekspres).</p> <p>Based on interviews with the Director of CV Semanggus Indah</p>	<p>The cooperative relationship between the company &</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Ekspress is known there is cooperation agreement with a period of once a year and can be extended and revised up to 1 year. Cooperation relationships are well established and payments are carried out by the Jakarta Office. OHS and PPE socialization have been carried out by the company to the contractor.</p>	<p>transporters is well established. The company has made regular payments to contractors.</p>

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY
4.1	Formal Sign-off of Assessment Findings
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;"> <p>PT Bina Sains Cemerlang Head of Sustainability Minamas Plantation</p>  <p><u>Alagendran Maniam</u> Monday, 21 October 2019</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><u>Trismadi Nurbayuto</u> Monday, 21 October 2019</p> </div> </div>

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

No	Institution/NGO/Community	Address	Phone/Email	Form of Communication	Date of Contact	Response	
						Yes	No
1.	Labor Agency	Musi Rawas District, South Sumatera	-	Interview	22 July 2019	√	-
2.	Plantation Agency	Musi Rawas District, South Sumatera	-	Interview	22 July 2019	√	-
3.	Environment Agency	Musi Rawas District, South Sumatera	-	Interview	22 July 2019	√	-
4.	Anyar Village (include 1 people of previous land owner)	Musi Rawas District, South Sumatera	-	Interview	23 July 2019	√	-
5.	Rengas Village (include 1 people of previous land owner)	Musi Rawas District, South Sumatera	-	Interview	23 July 2019	√	-
6.	Internal stakeholders: Bukit Pinang Estate - 2 persons – Replanting contractor - 12 persons – pesticide applicators - 7 persons – Fertilizer applicators & security - 2 persons – EFB applicator Sungai Pinang Estate - 6 persons - harvestman - 15 persons – foreman and pesticide applicators - 2 persons – pest and disease census workers - 5 persons – fertilizer applicators - 1 person – nursery worker Sungai Pinang Factory - 2 persons – grading workers - 1 person – sterilizer worker - 1 person – boiler operator.	Musi Rawas District, South Sumatera	-	Interview	23 – 24 July 2019	√	-
7.	Labor union (Sungai Pinang Factory)	Musi Rawas District, South Sumatera	Interview	Interview	23 July 2019	√	-
8.	PT Mitra Karya Jaya Perdana (Replanting contractor)	Musi Rawas District, South Sumatera	Interview	Interview	23 July 2019	√	-
9.	Gender Committee	Musi Rawas District, South Sumatera	Interview	Interview	23 July 2019	√	-
10.	CV Semanggus Indah	Musi Rawas District, South Sumatera	Interview	Interview	23 July 2019	√	-

	Ekspress (Transporter of CPO & PK).	Sumatera			2019		
11.	WALHI (<i>Wahana Lingkungan Hidup Indonesia</i>)	Jakarta, Indonesia.	informasi@walhi.or.id	Questionare	12 July 2019	-	√
12.	AMAN (<i>Aliansi Masyarakat Adat Nusantara</i>)	Jakarta, Indonesia.	rumahaman@cbn.net.id	Questionare	12 July 2019	-	√
13.	SAWIT WATCH	Jakarta, Indonesia.	info@sawitwatch.or.id	Questionare	12 July 2019	-	√
14.	WWF	Jakarta, Indonesia.	supporter-service@wwf.or.id	Questionare	12 July 2019	-	√

Appendix 2. Assessment Program

DATE	22 – 26 July 2019	
PROGRAM	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 22 July 2019		
09.10 – 10.20 10.20 – 16.00	Jakarta → Lubuk Linggau Lubuk Linggau → Musi Rawas Stakeholders consultation to Related Government Institution (Musi Rawas District and local NGO)	<ul style="list-style-type: none"> • ALL Team • ALL Team
16.00 – 18.00	Musi Rawas → Site PT. BINA SAINS CEMERLANG	<ul style="list-style-type: none"> • ALL Team
Tuesday, 23 July 2019		
08.00 - 09.00	Opening Meeting	<ul style="list-style-type: none"> • All Team
09.00 – 12.00	Field Observation Bukit Pinang Estate <ul style="list-style-type: none"> • Manuring, Spraying, Harvesting, EFB application, best agricultural practices • Worker Welfare (payments, complaint mechanism) • Hazardous Waste Material (B3) management; Worker facilities (housing, health clinic, clean water, etc), Land Fill, and Land Fire facilities, Storage, ect. • Legal Operational and Conservation Area 	<ul style="list-style-type: none"> • SAP • HRK
09.00 - 12.00	Stakeholders consultation to Nearest village, community leader.	<ul style="list-style-type: none"> • BRP • TNB
12.00 – 14.00	BREAK	ALL Team
14.00 – 17.00	<ul style="list-style-type: none"> • Stakeholders consultation to local contractor, Workers Union, Gender Committee. • Clarification of Public Consultation • Document Review and Verification of Previous Non-Conformance Record 	<ul style="list-style-type: none"> • All Team
Wednesday, 24 July 2019		
08.00 – 12.00	Field Observation Sungai Pinang Estate <ul style="list-style-type: none"> • Manuring, Spraying, Harvesting, EFB application, best agricultural practices • Worker Welfare (payments, complaint mechanism) • Hazardous Waste Material (B3) management; Worker facilities (housing, health clinic, clean water, etc), Land Fill, and Land Fire facilities, Storage, ect. • Legal operational and Conservation Area 	<ul style="list-style-type: none"> • SAP/HRK • BRP • TNB
12.00 – 14.00	BREAK	<ul style="list-style-type: none"> • ALL Team
14.00 – 17.00	Field observation to Sungai Pinang POM <ul style="list-style-type: none"> • Security Post, FFB receiving, CPO & PK Sending/SCCS Aspect). • FFB grading, FFB processing, OHS Aspect, Worker Welfare (payments, complaint mechanism). • Water Treatment Plant, Schedule Waste, Workshop, Chemical Storage, WWTP, Leachate Water Management. 	<ul style="list-style-type: none"> • BRP • SAP/HRK • TNB
Thursday, 25 July 2019		

DATE	22 – 26 July 2019	
PROGRAM	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
08.00 – 12.00	<ul style="list-style-type: none"> Document Review and Verification of Previous Non-Conformance Record 	<ul style="list-style-type: none"> ALL Team
12.00 – 14.00	BREAK	<ul style="list-style-type: none"> ALL Team
14.00 – 15.00 15.00 – 17.00	<ul style="list-style-type: none"> Team Discussion (Prepare for Closing Meeting) Closing Meeting 	<ul style="list-style-type: none"> ALL Team ALL Team
Friday, 26 July 2019		
07.00 – 11.00 11.00 – 12.10	<ul style="list-style-type: none"> PT BSC → Lubuk Linggau Lubuk Linggau → Jakarta 	<ul style="list-style-type: none"> ALL Team ALL Team