

Roundtable on Sustainable Palm Oil Certification
R S P O

[✓] Surveillance

Name of Management : Kendawangan Palm Oil Mill – PT Gunajaya Karya Gemilang Subsidiary of Organisation
Bumitama Agri Ltd

Plantation Name : **PT Gunajaya Karya Gemilang**
Mekar Utama Estate, Kendawangan Estate, and Sungai Tapah Estate
PT Gunajaya Ketapang Sentosa
Banjarsari Estate, Seriam Jaya Estate, and Membuluh Sejahtera Estate

Location : Banjar Sari & Seriam Village, Kendawangan Sub District, Ketapang District, Kalimantan Barat Province, Indonesia

Certificate Code : **MUTU-RSPO/081**

Date of Certificate Issue : 03 December 2015 Date of License Issue : 03 March 2020

Date of Certificate Expiry : 02 December 2020 Date of License Expiry : 02 December 2020

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-4	04 to 08 November 2019	Trismadi Nurbayuto (Lead Auditor), Andi Pratama Pasaribu, I Wayan Sudi Antara, Radityo Puspanjana, Haikal Ramadhan Kharismansyah.	Octo HPN Nainggolan	Ardiansyah

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-4	06 February 2020

TABLE OF CONTENT
FIGURE

Figure 1. Location Map of PT. Gunajaya Karya Gemilang and PT Gunajaya Ketapang Sentosa	2
Figure 2. Operational Map of PT. Gunajaya Karya Gemilang	3
Figure 3. Operational Map of PT. Gunajaya Ketapang Sentosa	4

Abbreviations Used	5
--------------------	---

1.0 SCOPE of the CERTIFICATION ASSESSMENT

1.1 Assessment Standard Used	7
1.2 Organisation Information	7
1.3 Type of Assessment	7
1.4 Location of Mill and Plantations	7
1.5 Description of Area Statement	8
1.6 Planting Year and Cycles	8
1.7 Description of Mill and Supply Base	9
1.8 Estimate Tonnage of Certified Product	10
1.9 Other Certifications	11
1.10 Time-Bound Plan	11

2.0 ASSESSMENT PROCESS

2.1 Assessment Team	14
2.2 Assessment Methodology, Assessment Process and Locations of Assessment	14
2.3 Stakeholder Consultation and Stakeholders Contacted	19
2.4 Determining Next Assessment	20

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification	21
3.2 Summary of Assessment Report of Supply Chain Requirement	55
3.3 Conformity Checklist of Certificate and Logo Use	66
3.4 Summary of RSPO Partial Certification	67
3.5 Identification of Findings, Corrective Actions, Observations, Opportunity for Improvement and Noteworthy Positive Components	73
3.6 Summary of Arising Issues from Public, Management and Auditor Responses	86

4.0 CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY

4.1 Formal Signing of Assessment Findings	80
---	----

APPENDICES

1. List of Stakeholders Contacted in the RSPO Certification Process	90
2. Assessment Program	92

Figure 1. Location Map of Location Map of PT. Gunajaya Karya Gemilang and PT Gunajaya Ketapang Sentosa, Kalimantan Barat

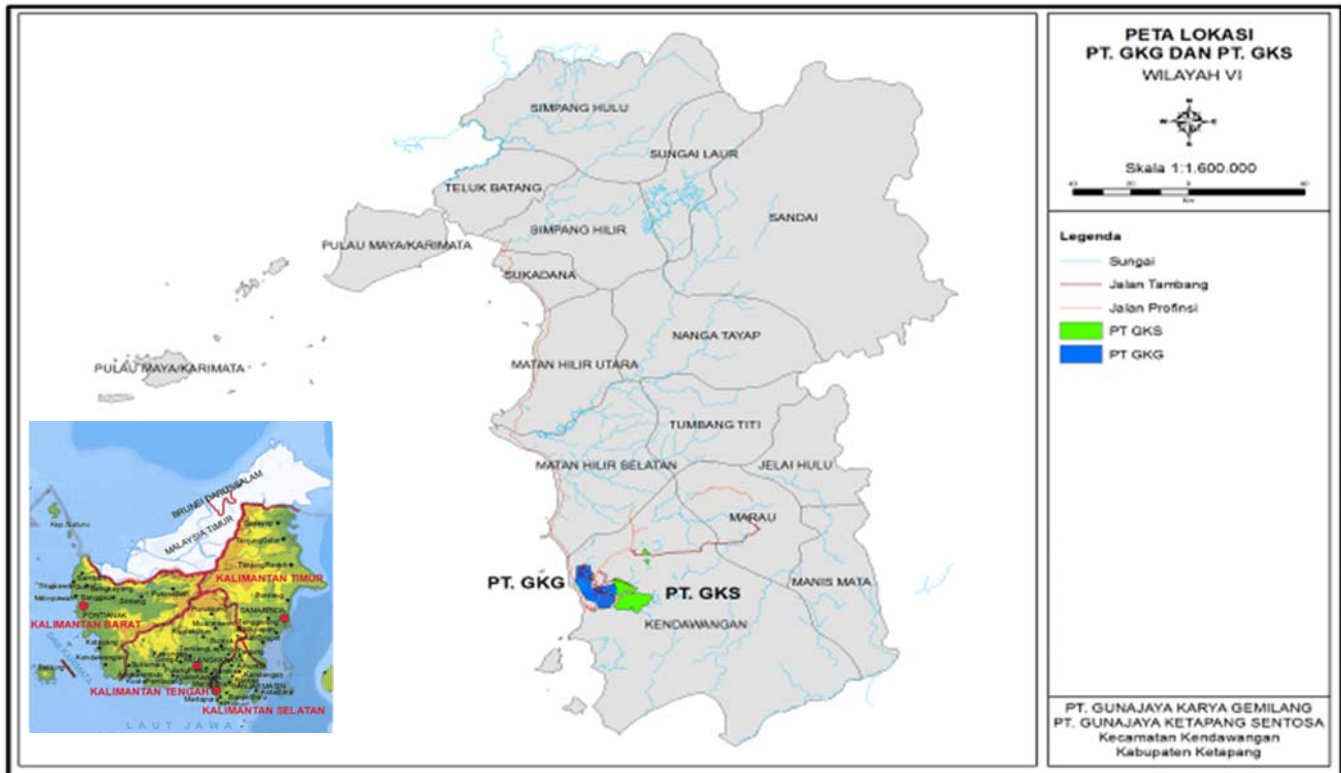


Figure 2. Operational Map of PT. Gunajaya Karya Gemilang, Village of Banjarsari, Ketapang Regency

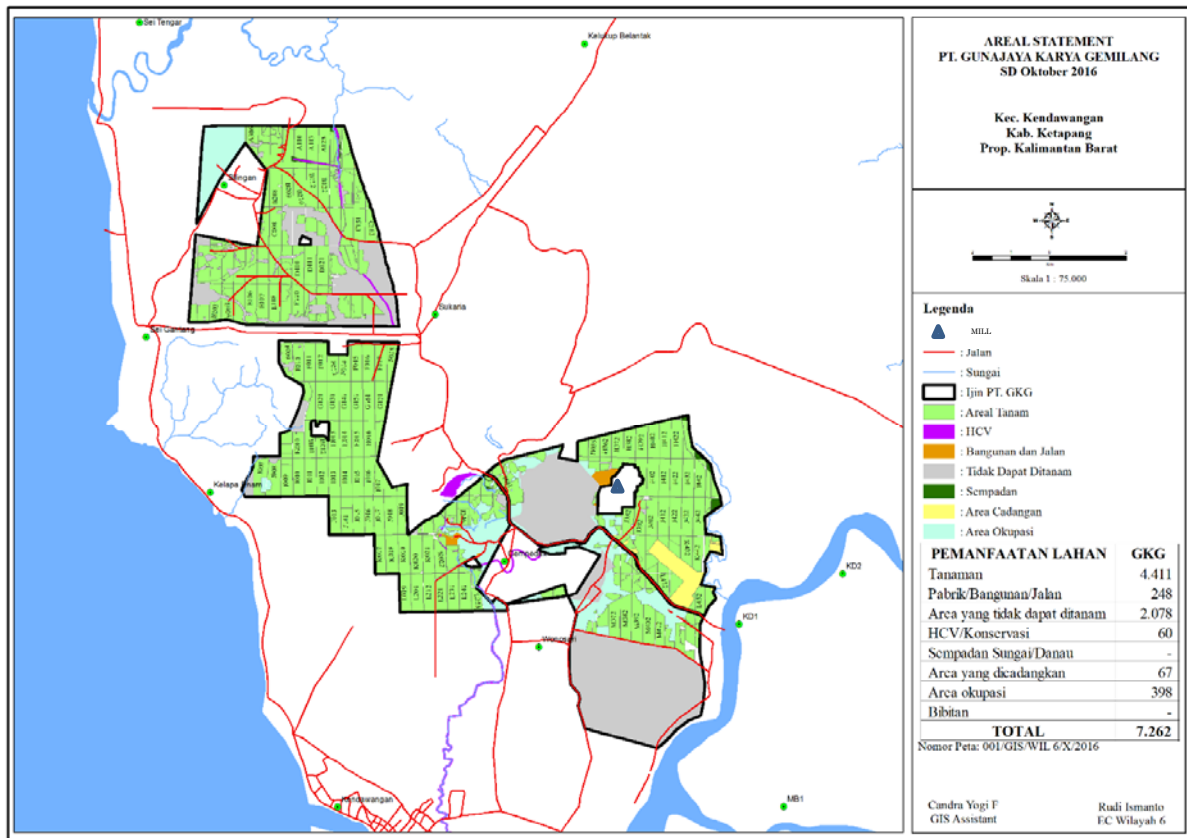
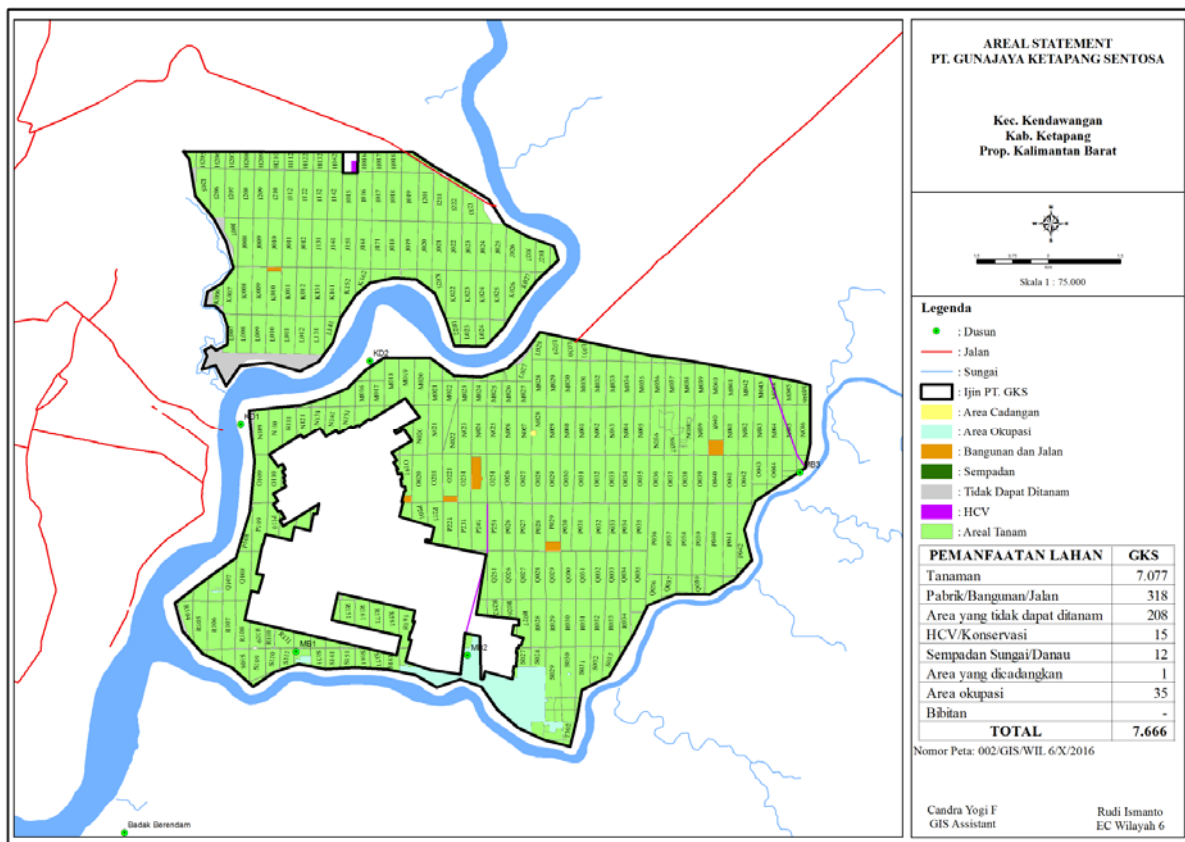


Figure 3. Operational Map of PT. Gunajaya Ketapang Sentosa



Abbreviations Used

ASA	:	Annual Surveillance Assessment
BGA	:	Bumitama Gunajaya Agro
BHS	:	BGA Harvesting System
BMP	:	Best Management Practices
BMS	:	BGA Manuring System
BOD	:	Biological Oxygen Demand
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i>
BSRE	:	Banjarsari Estate
BSS	:	BGA Spraying System
CH	:	Certificate Holder
CPO	:	Crude Palm Oil
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm Oil
CSR	:	Corporate Social Responsibility
DPPL	:	<i>Dokumen Pengelolaan dan Pemantauan Lingkungan</i> (Environmental Management and Monitoring Documents)
EFB	:	Empty Fruit Bunch
E.I.A	:	Environment Impact Assessment
FFA	:	Free Fatty Acid
FFB	:	Fresh Fruit Bunch
FGD	:	Focus Group Discussion
FPIC	:	Free, Prior, Informed, Consent
FR	:	Frequent Rate
GHG	:	Green House Gas
GKG	:	Gunajaya Karya Gemilang
GKS	:	Gunajaya Ketapang Sentosa
HCV	:	High Conservation Value
HGB	:	<i>Hak Guna Bangunan</i>
HGU	:	<i>Hak Guna Usaha</i> (Land Use Title)
HRD	:	Human Resource Department
HSE	:	Health, Safety and Environment
IPB	:	Institute Pertanian Bogor
IPM	:	Integrated Pest Management
ISPO	:	Indonesian Sustainable Palm Oil
LUCA	:	Land Uses Change Analysis
KER	:	Kernel Extraction Rate
KNDE	:	Kendawangan Estate
MSDS	:	Material Safety Data Sheet
MSJE	:	Membuluh Sejahtera Estate
MUTE	:	Mekar Utama Estate
NPP	:	New Planting Procedure
OER	:	Oil Extraction Rate
OFI	:	Opportunity For Improvement
OHS	:	Occupational Health and Safety
PK	:	Palm Kernel
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PPE	:	Personal Protective Equipment
RH	:	Regional Head
RKL RPL	:	<i>Rencana Pengelolaan Lingkungan – Rencana Pemantauan Lingkungan</i> (Environment Management and Monitoring)

		Plan)
RSPO	:	Roundtable on Sustainable Palm Oil
RTE	:	Rare, Threatened, Endangered
SCCS	:	Supply Chain Certification System
SIA	:	Social Impact Assessment
SJYE	:	Seriam Jaya Estate
SOP	:	Standard Operating Procedure
SR	:	Severity Rate
STHE	:	Sungai Tapah Estate
WTP	:	Water Treatment Plan
WWTP	:	Water Waste Treatment Plan

1.0	SCOPE of the CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used	<ul style="list-style-type: none"> Indonesian National Interpretation of RSPO P&C 2013 by INA-NITF (Indonesian National Interpretation Task Force) July 2016, endorsed by the RSPO BoG 30th September 2016. RSPO Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014 revised on 14 June 2017 (Module D / E for CPO Mill) RSPO Certification System for Principles and Criteria, 14 June 2017 	
1.2	Organisation Information		
1.2.1	Organisation name listed in the certificate	PT Gunajaya Ketapang Sentosa & PT Gunajaya Karya Gemilang, Subsidiary of Bumitama Agri Ltd	
1.2.2	Contact person	Lim Sian Choo	
1.2.3	Organisation address and site address	<ul style="list-style-type: none"> RSPO registered company: Jl. Melawai Raya No. 10 Kebayoran Baru Jakarta Selatan 12160 Indonesia. Liaison Office: Jl. Melawai Raya No. 10 Kebayoran Baru Jakarta Selatan 12160 Indonesia. 	
1.2.4	Telephone	(62-21) 727 98418	
1.2.5	Fax	(62-21) 727 98665	
1.2.6	E-mail	lim.sian.choo@bumitama.com	
1.2.7	Web page address	www.bumitama-agri.com	
1.2.8	Management Representative who completed the application for certification	Lim Sian Choo (Head of CSR and Corporate Sustainability)	
1.2.9	Registered as RSPO member	1-0043-07-000-00 – 08 October 2007	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Kendawangan POM and 6 supply base: PT Gunajaya Karya Gemilang (Mekar Utama Estate, Sungai Tapah Estate, Kendawangan Estate) and PT Gunajaya Ketapang Sentosa (Seriam Jaya Estate, Membuluh Sejahtera Estate, Banjar Sari 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
	Kendawangan POM	Banjarsari Village, Kendawangan Sub District, Ketapang District, Kalimantan Barat Province, Indonesia	S 02° 26' 45" E 110° 15' 57"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate

			Latitude	Longitude				
	Mekar Utama Estate	Mekar Utama Village, Kendawangan Sub District, Ketapang District, Kalimantan Barat Province, Indonesia	S 02° 28' 11"	E 110° 12' 09"				
	Sungai Tapah Estate	Mekar Utama Village, Kendawangan Sub District, Ketapang District, Kalimantan Barat Province, Indonesia	S 02° 25' 49"	E 110° 11' 55"				
	Kendawangan Estate	Kendawangan Village, Kendawangan Sub District, Ketapang District, Kalimantan Barat Province, Indonesia	S 02° 26' 35"	E 110° 16' 15"				
	Banjar Sari Estate	Banjarsari Village, Kendawangan Sub District, Ketapang District, Kalimantan Barat Province, Indonesia	S 02° 25' 33"	E 110° 19' 01"				
	Seriam Jaya Estate	Seriam Village, Kendawangan Sub District, Ketapang District, Kalimantan Barat Province, Indonesia	S 02° 29' 03"	E 110° 20' 28"				
	Membuluh Sejahtera Estate	Seriam Village, Kendawangan Sub District, Ketapang District, Kalimantan Barat Province, Indonesia	S 02° 28' 53"	E 110° 23' 07"				
1.5	Description of Area Statement							
1.5.1	Tenure							
	<ul style="list-style-type: none">State		HGU: 14,927.70 Ha *HGB on progress: 120.00 Ha **HGU 2016: 177.90 Ha Total: 15,225.60 Ha					
	<ul style="list-style-type: none">Community		Ha	Ha				
	<ul style="list-style-type: none">Area of ± 120 ha for non planted areas (housing, buildings and infrastructures) which are currently in the process of HGB. This has become part of the certification audit object since stage 2*Additional scope of certification of ± 177.9 ha for planting areas that were previously outside the scope of certification and currently have an HGU**							
1.5.2	Area Statement							
		PT GKG (Ha)	PT GKS (Ha)	Total (Ha)				
	<ul style="list-style-type: none">Total area	7,559.79	7,665.81	15,225.60				
	<ul style="list-style-type: none">Mature area	4,565.91	7,076.85	11,642.76				
	<ul style="list-style-type: none">Immature area	-	-	-				
	<ul style="list-style-type: none">Mill/Building/Road	390.65	318.19	708.84				
	<ul style="list-style-type: none">Unplanted Area	2,078.29	208.00	2,286.29				
	<ul style="list-style-type: none">Riparian river	-	11.64	11.64				
	<ul style="list-style-type: none">Occupation	397.81	35.00	432.81				
	<ul style="list-style-type: none">Reserved Area	67.13	1.13	68.26				
	<ul style="list-style-type: none">HCV	60.00	15.00	75.00				
1.6	Planting Year and Cycles							
1.6.1	Age profile of planting year							
	Planting Year	Hectarage (Ha)						
		PT GKG			PT GKS			Total
		MUTE	STHE	KNDE	BSRE	SJYE	MSJE	
	2007	453.00	346.73	-	-	-	-	799.73

	2008	103.38	142.65	537.12	1,502.24	548.89	1,020.68	3,854.96
	2009	614.73	233.65	220.15	263.75	911.59	1,577.89	3,821.76
	2010	465.30	112.09	225.22	277.10	249.02	575.15	1,903.88
	2011	159.45	8.71	274.31	34.19	7.83	32.94	517.43
	2012	116.09	28.03	420.01	7.82	-	-	571.95
	2013	52.77	-	29.63	-	4.15	63.61	150.16
	2014	-	-	-	-	-	-	-
	2015	-	-	16.46	-	-	-	16.46
	2016	6.43	-	-	-	-	-	6.43
	TOTAL	1,971.15	871.86	1,722.90	2,085.10	1,721.48	3,270.27	11,642.76
1.6.2	New Planting area after January 2010			3,159.88 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 (%)	
	Kendawangan POM	60	281,144	64,021	22.77	12,321	4.38	
	* Production data source from November 2018 to October 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)	%	
	Mekar Utama Estate	2,817.89	1,971.15	36,151	19.91	36,151	100	
	Kendawangan Estate	3,801.94	1,722.90	32,276	18.73	32,276	100	
	Sungai Tapah Estate	939.96	871.86	20,981	24.06	20,981	100	
	Seriam Jaya Estate	1,895.43	1,721.48	44,120	25.63	8,293	18.80	
	Banjar Sari Estate	2,269.97	2,085.10	53,195	25.51	53,195	100	
	Membuluh Sejahtera Estate	3,500.41	3,270.27	50,442	15.42	10,629	21.07	
	TOTAL	15,225.60	11,642.76	237,165	20.65	161,525	68.11	
	*Production data source from November 2018 to October 2019							
	** 68% certified FFB's which sent to Kendawangan Mill, 32% FFB certified sent to Pembangunan Raya POM PT Agro Sejahtera Manunggal subsidiary of Bumitama Agri Ltd.							
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)			
	Kelompok Tani Mandiri/MUTE (RSPO Non certified)	(associate smallholders) PT GKG	280	1,050	9,676			

	MUTE (RSPO Non certified)	(associate smallholders) PT GKG	40	178	1,443
	Karya Bersama Smallholder; Usaha Bersama Smallholder; and Binasari Smallholder/STHE (RSPO Non certified)	(associate smallholders) PT GKS	1,455	1,627.45	32,368
	Kelompok Tani Mandiri/KNDE (RSPO Non certified)	(associate smallholders) PT GKG	150	1,627	8,629
	Kelompok Tani Mandiri/BSRE	(associate smallholders) PT GKS	277	580	5,278
	Fajar Mandiri Smallholder/SJYE (RSPO Non certified)	(associate smallholders) PT GKS	1,588	1,354.97	7,744
	Sungai Bedaun Estate	PT GKS	-	3,108	51,533
	Fajar Mandiri Smallholder/MSJE	PT GKS	1,588	1,354.97	1,278
	Others (RSPO Non certified)	Independent supplier	-	-	1,669
	TOTAL				119,619
	*Production data source from November 2018 to October 2019)				
1.7.4	Product categories		FFB, CPO, PK		
1.8	Tonnage of Product				
1.8.1	Past Annual Claim Certified Product	Last Year Projected Certified Volume (MT)		Last Year Actual Certified Volume (November 2018 to October 2019) (MT)	
	FFB Processed	231,000		161,525	
	CPO Production	53,700		36,794	
	Palm Kernel (PK) Production	9,700		7,084	
	*FFB processed in the Kendawangan POM is only 68% of FFB prduction PT GKG & PT GKS estates, so that CPO and PK production is low. And the remaining 32% of FFB is processed in Pembangunan Raya POM that has been RSPO certified and is still under same group of Bumitama Agri Ltd.				
1.8.2	Product selling				
	Tonnage of selling product	Period of actual selling product (November 2018 to October 2019) (MT)			
	• CSPO sold as RSPO certified product	9,343.71			
	• CSPK sold as RSPO certified product	0			
	• CSPO sold under other scheme	0			
	• CSPK sold under other scheme	0			
	• CSPO sold as conventional	18,000			
	• CSPK sold as conventional	5,211			
1.8.3	Estimate of Certified FFB Claim				

	Name of Estate(s)	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)		
	Mekar Utama Estate	2,817.89	1,971.15	37,959	20.90		
	Kendawangan Estate	3,801.94	1,722.90	33,890	19.67		
	Sungai Tapah Estate	939.96	871.86	22,030	25.27		
	Seriam Jaya Estate	1,895.43	1,721.48	46,326	26.91		
	Banjar Sari Estate	2,269.97	2,085.10	55,855	26.79		
	Membuluh Sejahtera Estate	3,500.41	3,270.27	52,964	16.20		
	TOTAL	15,225.60	11,642.76	249,024	21.68		
	<i>*Projected FFB production for December 2019 to 02 December 2020</i> <i>**FFB production estimates increase 5%, consider from planting year</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 (%)
	Kendawangan POM	60	249,024	57,275	23.00	11,206	4.5
	<i>*Projected CSPO and CSPK production for 03 December 2019 to 02 December 2020</i> <i>** CPO and PK estimates are calculated based on increased FFB production</i>						
1.9	Other Certifications						
	ISPO			<ul style="list-style-type: none">ISPO certificate with No. MUTU-ISPO/084 for PT GKGISPO certificate with No. MUTU-ISPO/087 for PT GKS			
1.10	Time Bound Plan						
1.10.1	Time Bound Plan for Other Management Units						
	Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status	
	MILL	Time Bound Plan					
	Pundu Nabatindo (PT Windu Nabatindo Lestari)	2014	Pundu Nabatindo	2014	KotawaringinTimur Regency Kalimantan Tengah	Certified	
			Koperasi Harapan Abadi	2020		-	
			Kelompok Tani Tenera (Independent Smallholders)	2018	Katingan Regency, Kalimantan Tengah	Certified	
			PT Fajar Bumi Nabati (FBI)	2019		-	
			PT Gemilang Subur Maju (GSM)	2019	Kotawaringin Timur Regency Kalimantan Tengah	-	
	Katari Agro (PT Windu Nabatindo Lestari)	2016	Pelantaran Agro Estate	2016	Kotawaringin Timur Regency, Kalimantan Tengah	Certified	
			Katari Agro Estate				
			Pantai Mas Estate				
	Gunung Makmur (PT Karya Makmur Bahagia)	2014	Gunung Makmur	2014	Kotawaringin Timur Regency, Kalimantan Tengah	Certified	
			Sungai Mentaya				
			Bukit Daman				
			KUD Mekar Jaya	2019			

					2019)
		KUD Sekar Tani	2019		ST-2 Audit (June 2019)
		KUD Lestari	2019		ST-2 Audit (June 2019)
		KUD Marga Rahayu	2019		ST-2 Audit (June 2019)
		KUD Usaha Bersama	2019		ST-2 Audit (June 2019)
		KUD Tani Santoso	2019		ST-2 Audit (June 2019)
		PT Tanah Tani Lestari	2020		NPP Audit (2018)
		Koperasi Hapakat (PT TTL)	2020		-
		Koperasi Rika Bersatu (PT TTL)	2020		-
		Koperasi Usaha Bersama (PT TTL)	2020		-
		Koperasi Eka Kaharap (PT TTL)	2020		-
		Koperasi Berkat Usaha Bersama (PT TTL)	2020		-
		Koperasi Bina Tani (PT TTL)	2020		-
		Kelompok Tani Karya Bersama (Independent Smallholders)	2020		-
Bukit Makmur (PT Karya Makmur Bahagia)	2019	Bukit Makmur	2014	Kotawaringin Timur Regency, Kalimantan Tengah	Previous on GMKM certification scope
		Bukit Kecubung	2014		Previous on GMKM certification scope
		Sungai Puring (PT Langgeng Makmur Sejahtera)	2020		No NPP have got sanction
		Koperasi Telawang Bersatu	2020		-
		Koperasi Hinje Ate	2020		-
		Koperasi Eka Kaharap (PT LMS)	2020		-
Kotawaringin (PT Bumitama Gunajaya Abadi)	2019	Sepantaian	2019	Kotawaringin Barat Regency, Kalimantan Tengah	No NPP have got sanction
		Danau Merah			
		Kotawaringin			
		Tonam Raya			
Lamandau Mill (PT Bumitama Gunajaya Abadi)	2020	(PT Bumitama Gunajaya Abadi)	2020	Lamandau Regency, Kalimantan Tengah	-
		Kumai Hilir Estate (PT Andalan Sukses Makmur)	2020	Kotawaringin Barat Regency, Kalimantan Tengah	NPP Was Complete
		PT Investa Karya Bhakti	2020	Lamandau Regency, Kalimantan Tengah	NPP Was Complete
		Koperasi Kompak Maju Bersama	2020	Lamandau Regency, Kalimantan Tengah	-
		Koperasi Mitra Bahaum	2020	Lamandau Regency, Kalimantan Tengah	-
		Koperasi Tanjung Biru	2020	Lamandau Regency,	-

				Kalimantan Tengah	
		Koperasi Seberang Jaya Sejati	2020	Lamandau Regency, Kalimantan Tengah	-
		Koperasi Pulau Sejahtera	2020	Kotawaringin Barat Regency, Kalimantan Tengah	-
Kendawangan Mill (PT. Gunajaya Karya Gemilang)	2016	Mekar Utama	2016	Ketapang Regency, Kalimantan Barat	Certified 2015
		Kendawangan			
		Banjar Sari			
		Seriam Jaya			
		Membuluh Jaya			
	2019	Koperasi Serba Usaha Bersama	2019	Ketapang Regency, Kalimantan Barat	-
		Koperasi Binasari			
		Koperasi Serba Usaha Karya Bersama			
		Koperasi Binasari			
		Koperasi Perkebunan Fajar Mandiri			
		Koperasi Rimba Sari			
SukaDamai (PT Rohul Sawit Industri)	2019	PT Masuba Citra Mandiri – 1,567.07 Ha	2019	Rokan Hulu Regency, Riau	Certified 2019
		PT Masuba Citra Mandiri – 326.04 Ha the area which suspect into liability mechanism	2020	Rokan Hulu Regency, Riau	-
		Koperasi Karya Melayu Sejati	2019	Rokan Hulu Regency, Riau	-
Pembangunan Raya Mill (PT Agro Sejahtera Mandiri)	2019	Pembangunan Raya	2019	Ketapang Regency, Kalimantan Barat	Certified 2019
		Bengkuang Raya	2019		
		Belaban Raya	2019		
		KopBun Agro Seriam Mandiri	2019		
	2020	Teluk Rengit (PT Gunajay Harapan Lestari)	2020	Ketapang Regency, Kalimantan Barat	-
		Belaban – 768.72 Ha the area which suspect into liability mechanism	2020	Ketapang Regency, Kalimantan Barat	-
		Koperasi Bawal Sejahtera Mandiri	2020	Ketapang Regency, Kalimantan Barat	-
Sungai Rasau Mill (PT Karya Bakti Agro Sejahtera)	2020	Marau Raya	2020	Ketapang Regency, Kalimantan Barat	ST-1 (2014)
		KUD Rangkong Bertuah	2020	Ketapang Regency, Kalimantan Barat	-
		KUD Rasau Tiga Bersama	2020	Ketapang Regency, Kalimantan Barat	-
		PT Agriplus	2021	Ketapang Regency, Kalimantan Barat	-
Selucing Mill (PT. Windu Nabatindo Abadi)	2020	Serawak Damai (PT Windu Nabatindo Sejahtera)	2020	Central Kalimantan	Have not obtained the HGU
Sungai Cempaga	2020	PT. Windu Nabatindo Abadi	2020	Central Kalimantan	No NPP have got sanction

	Mill (PT. Windu Nabatindo Abadi)		PT Nabatindo Karya Utama	2020	Central Kalimantan	NPP was complete
			KSU Sehati Pundu	2020	Central Kalimantan	-
			Koperasi Koling Hapakat	2020	Central Kalimantan	-
	Bukit Tunggal Jaya Mill (PT Ladang Sawit Mas)	2020	PT Ladang Sawit Mas	2020	Ketapang Regency, West Kalimantan	NPP
			KopBun Bukit Tunggal Sejahtera	2020		-
			KopBun Mitra Perjalanan Permai	2020		-
			PT Lestari Gemilang Intisawit	2020		NPP was complete
			Koperasi Kayong Sekayuk	2020		
			Koperasi Mitra Sejati	2020		-
			PT Ago Manunggal Sawitindo	2020		NPP was complete
			PT Nabati Agro Subur	2020		-
			PT Sejahtera Sawit Lestari	2020		-
			PT Karya Makmur Langgeng	2020		NPP was complete
			PT Gemilang Makmur Subur	2021		NPP on Process
			Koperasi Istana Pawan Mandiri	2021		-
			Koperasi Rungau Sejahtera	2021		-
			PT Dmai Agro Sejahtera	2021		NPP on Process
	Bukit Belaban Mill (PT Sentosa Prima Agro) **Replanting from Acquisition	2021	PT Sentosa Prima Agro	2021	Ketapang Regency, West Kalimantan	-
			PT Raya Sawit Manunggal	2021		-
			PT Wahana Hijau Indah	2021		-
			PT Hungarindo Persada	2022		-
1.10.2	Progress of Associated Smallholders and Outgrowers for Certifiable Standard					
	The Certificate holder has an agreement with smallholders scheme, such as: GKG <ul style="list-style-type: none">- Usaha Bersama Cooperative: agreement No. 01/PKS-GKG/VIII/2008 dated 25 August 2008- Karya Bersama Cooperative: agreement No. 01/PKS-GKG/VIII/2008 dated 25 August 2008- Binasari Cooperative: agreement No. 01/PKS-GKG/VIII/2008 dated 25 August 2008- Sawit Bersama Cooperative: agreement dated 6 February 2012 GKS <ul style="list-style-type: none">- Rimba Sari Cooperative: agreement No. 01/PKS-GKS/V/2017 dated 15 May 2017- Fajar Mandiri Cooperative: agreement dated 27 October 2010- Sawit Makmur Cooperative: agreement No. 001/SKK SM-GKS/IV/2015 dated 5 April 2015 <p>Based on time bound plan, the smallholders will be assessed in 2018 (3 years after the factory is certified). The progress for Certifiable Standard, in some smallholders already have land use rights, for example in the “Koperasi Serba Usaha/ Kelompok Tani Bersama”. But until ASA 4 the smallholders has not been certified yet, because RaCP still on progress and management unit will be planned audit for smallholders on 2020.</p>					

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-4	<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 OHS and Social.</p> <p>2. 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, ISO 22000 awareness. Did some audit ISPO scheme with aspects Best management practices. During this assesment verified Best Management Practices and Long Term Business Plan.</p> <p>3. Andi Pratama Pasaribu (Auditor). Indonesian citizen. Bachelor degree, majoring social economy. He has several of work experiences (more than 5 years) as the operational staff since 2008. He has been followed the Training of Lead Auditor Indonesian Sustainable Palm Oil (ISPO) which was held by ISPO Commission in 2013 and Training of Lead Auditor Roundtable on Sustainable Palm Oil (RSPO) by Proforest and Daemeter in 2016. He has been attended several kinds of training, such as High Conservation Value (HCV) Training, Lead Auditor ISO 9001:2008, Lead Auditor ISO 14001:2005, auditor OHSAS, lead auditor RSPO supply chain by BMTRADA etc. He has some experiences of Sustainability Palm Oil scheme audit in Indonesian and Malaysia in best management practices, land legality, environmental, social and worker welfare aspect and supply chain. During this audit, he verify Transparencies, Worker Welfare, SCCS and Legal.</p> <p>4. Radytio Puspanjana (Auditor). Indonesian Citizen. Bachelor of agriculture, majoring in Soil Science. Agriculture Faculty. He was working as honorarium Officer at the Riau Province Plantation Agency in the division of huge estate for 1 year. The participated trainings are Survey and Mapping (GIS) Training which was held by National GMT, ISPO auditor training, ISO 9001/2008 auditor training, ISO 14001/2004 auditor training, IHT Geospatial Information System, IHT High Conservation Value, IHT Environmental Impact Assessment, IHT Green House Gas and RSPO Awareness In House Training. Since 2015 has been following many audit as auditor base on Best Management Practice and Environment. During this assesment verified Environment, HCV, and GHG Calculation.</p> <p>5. I Wayan Sudi Antara (Technical Expert). Bachelor of Agricultural Engineering, Institut Pertanian Bogor. Experienced in preparation of EIA since 1990 (having a certificate of competency Chairman of the Drafting Team EIA), involved as auditor appraisal of Sustainable Forest Management and schemes Indonesian Ecolabel Institute / LEI since 1997 and the scheme of the Ministry of Forestry since 2002 (a certified Auditor of LEI) , worked in a forestry consultant, experienced in assessment ISPO and ISPO some company as auditor as auditor (have passed the training ISPO).</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA-4	<p>Number of auditors : 4 auditor</p> <p>Number of days for ASA-4 at site : 5 days</p> <p>Number of working days for ASA-4 at site : 20 Working days</p>
2.2.2	Assessment Process
ASA-4	The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Gunajaya Karya Gemilang – Gunajaya Ketapang Sentosa to the requirements of Indonesian National Interpretation of RSPO Principles and Criteria 2013 by INA-NITF (Indonesian National Interpretation Task Force) July 2016, endorsed

by the RSPO Board of Governors 30th September 2016 and Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on June 2017 (Module E for CPO Mill).

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.

Some opportunities for improvement of the results ASA-4 delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase (Recertification).

Improvement of findings from ASA-3 findings were observed by auditors at this ASA-4 assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA-3.

The assessment program please find Appendix 2.

2.2.3	Locations of Assessment
ASA-4	<p>Number of unit in this certification activity is 1 (one) Mill and 6 (six) Own Estates. The auditor team used the $(0.8\sqrt{y}) \times (z)$ formula to determine the management units sampling to be focused on and also considered the issues raised by stakeholder. (y) is the number of estate and (z) multiplier defined by the risk assessment. The consideration for risk assessment are geografic locations, distance of estate, complexity of labour, landscape setting, presence of HCV, number of communities/conflict, legality etc. Based on this formula, the auditor team determined that the sampling locations are one palm oil mill (Kendawangan POM) and four estates (Mekar Utama Estate, Kendawangan Estate, Seriam Jaya Estate, and Membuluh Sejahtera Estate).</p> <p>Kendawangan Mill:</p> <ul style="list-style-type: none"> • Sortation and Grading. Observation regarding procedure, safety work, PPE, FFB Criteria, and wage • Sterilizer. Observation regarding procedure, safety work, PPE, Training, and medical checkup • Kernel. Observation regarding procedure, safety work, PPE, and medical checkup • Clarification. Observation regarding procedure, safety work, PPE, FFB Criteria, and emergency response awareness. • Engine Room. Observation regarding procedure, safety work, PPE, operator license, and wage • Boiler. Observation regarding procedure, safety work, PPE, and operator license • Weighbridge Station. Observation and interview with an operator related to supply chain procedure. • Security. Observation and interview with 2 workers related to the acceptance of FFB, Worker Welfare, etc. • Grading Station. Observations and interviews with 3 workers related to criteria for EFB grading, wages, sampling techniques, and PPE. • ETP. Observation on ETP, indication of waste overflow, OHS implementation, and interview with worker about worker welfare, OHS, and company's policies. • POME Land Application, Block E43. Observation of waste water management as nutrient cycle strategy. • Water Intake Reservoir. Observation of the management of water management consumption for Mill process and domestic. • Loading Ramp. Observation and interview with QC and sortation officer regarding to sortation procedure and implementation to ensure quality of FFB from own estate or FFB supplier. • Firefighting simulation using hydrant No. 4 and 5. Observation of firefighting readiness in case of fire. Mill also equipped with fire extinguisher and first aid kit to handling emergency situation. • Workshop. Observations and interviews regarding training for workers, OSH implementation, first aid, health checks, overtime, salary, complaint mechanism and management of hazardous and toxic waste. • Chemical material warehouse. Field observations related to the fulfillment of health safety as well as interviews with a warehouse clerk of safety health. • WTP. Observations and interviews related to water management, recording of water used, OHS, and waste management. • Solid Waste consist of EFB, shell, fiber. Observation of the management of Solid waste consist of EFB, fiber and shell from the production process of mill.

- **Mill Drainage.** Observations mill effluent lines, sanitation mill and flow of leaching mill.

Sungai Tapah Estate

- **Block H14 Division 4.** Piezometer, Water Level, and Peat Subsidence. Observation regarding peat management
- **Block L18/L17 division 1.** Circle and Path Spraying. Observation regarding procedure, safety work, PPE, and corporate policy
- **Block I14/I13 division 4.** Manuring. Observation regarding procedure, safety work, PPE, and corporate policy
- **Body shower of spraying team (BSS) and Block manuring system.** Observation the conditions body shower room and PPE handling.
- **Pesticide warehouse.** Field observations related to the fulfillment of health safety as well as interviews with a warehouse clerk of safety health.
- **Fertilizer Warehouse.** Observations relating to the implementation of storage hazardous material, Health safety and labor management.
- **Housing Complex Cendrawasih.** Observation the availability of infrastructure such as housing, water and electricity facilities, fire extinguisher, education facilities, religious facilities, health facilities, daycare domestic waste management, childcare and sports facilities.
- **Generator room for Housing Complex Cendrawasih.** Observation and interview with clerk related to generator system, engine capacity, and possible occurrence of spills to environment, PPE dan Health safety and labor management.
- **Reservoir & fresh water pump room for Housing Complex Cendrawasih.** Observation and interview with clerk related to generator system, engine capacity, and possible occurrence of spills to environment, PPE dan Health safety, water management consumption and labor management.
- **Landfill Block J-19.** Observation about landfill management.
- **Fuel Storage.** Observations relating to the implementation of storage hazardous material, Health safety and potensial spill management.
- **Boundary poles No. KSV 007 and KSV 008 Block H09.** Observation of boundary poles as land demarcation marking.
- **Boundary poles No. KSV 010 Block I07.** Observation of boundary poles as land demarcation marking.
- **Occupation area Block I07A and I07B.** Observation of occupational area inside the company's concession.

Seriam Jaya Estate

- **Block Q21/Q20.** Circle and Path Spraying. Observation regarding procedure, safety work, PPE, and corporate policy
- **Block Q9.** Manuring. Observation regarding procedure, safety work, PPE, and corporate policy
- **Block Q24.** EFB Application. Observation regarding procedure of EFB application
- **Block Q12.** Nest Box. Observation regarding IPM
- **Boundary poles No. GKS 151 Block R19/20.** Observation of boundary poles as land demarcation marking. Boundary poles located in the middle of the block separated with smallholder area of Cooperative of Fajar Mandiri.
- **Boundary poles No. GKS 150 Block S19.** Observation of boundary poles as land demarcation marking. Boundary poles located in the middle of the block separated with smallholder area of Cooperative of Fajar Mandiri.
- **Occupation area Block S22/21.** Observation of occupational area inside the company's concession.
- **Clinic PT GKG.** Observation First aid rooms reasonably clean condition, medical waste recording, labor medical check up and work accident.
- **Housing Complex.** Observation the availability of infrastructure such as housing, water and electricity facilities, fire extinguisher, education facilities, religious facilities, health facilities, daycare domestic waste management, childcare and sports facilities.
- **Workshop.** Observations and interviews with workers related to the management and implementation of health safety, and social worker.
- **Fire Fighting Equipment Storage.** Simulation the function of fire extinguishers and team readiness.
- **Fuel storage.** Observations and interviews regarding wages, training, PPE, workplace accidents, health checks and complaint mechanisms.
- **Hazardous waste temporary warehouse.** Field observations related to the fulfillment of the attributes health and

safety, recording, and the implementation of compliance requirements hazardous waste temporary warehouse.

- **Fertilizer Warehouse.** Observations relating to the implementation of storage hazardous material, Health safety and labor management.
- **Body shower of spraying team and mixing area (BSS & BMS).** Observation the conditions body shower room and PPE.
- **Chemical material warehouse.** Field observations related to the fulfillment of health safety as well as interviews with a warehouse clerk of safety health.
- **Housing Complex D6.** Observation and interview with residents about housing facilities, domestic waste management, and complaint mechanism.
- **Landfill.** Observation about landfill management.

Banjarsari Estate

- **Block K20/K21 Division 3. Manuring.** Observation and interview with 6 workers regarding the implementation of fertilization procedures and safe working methods both for itself and the environment.
- **Block H14 Division 3. Circle and Path Spraying.** Observation and interview with 10 workers regarding the implementation of weed control procedures and understanding in handling pesticides
- **Block K17 Division 2. Harvesting.** Observation and interview with 16 workers regarding FFB criteria and workers' understanding of their rights and obligations
- **Housing Complex.** Observation and interview with residents about housing facilities, domestic waste management, and complaint mechanism.
- **Workshop.** Observations and interviews regarding training for workers, OSH implementation, first aid, health checks, overtime, salary, complaint mechanism and management of hazardous and toxic waste.
- **Landfill block J29.** Observation about landfill management.
- **Agrochemical material warehouse.** Field observations related to the fulfillment of health safety as well as interviews with a warehouse clerk of safety health.
- **Fertilizer Warehouse.** Observations relating to the implementation of storage hazardous material, Health safety and labor management.
- **Clinic PT GKG.** Observation First aid rooms reasonably clean condition, medical waste recording, labor medical check up and work accident.
- **Body shower of spraying team and mixing area (BSS & BMS).** Observation the conditions body shower room and PPE.
- **Fire Fighting Equipment Storage.** Simulation the function of fire extinguishers and team readiness.

Kendawangan Estate:

- **HCV Area Block I22 and I23. HCV was burned.** Observation of HCV area that burned during the dry season and it management to recovery.
- **HCV Area Block L 25 B.** Observation the implementation of management in HCV area in form riparian Tapah river.

Metro Kendawangan (central).

- **Hazardous waste temporary warehouse.** Field observations related to the fulfillment of the attributes health and safety, recording, and the implementation of compliance requirements hazardous waste temporary warehouse.
- **Fertilizer Warehouse.** Observations relating to the implementation of storage hazardous material, Health safety and labor management.
- **Central Workshop.** Observations and interviews with workers related to the management and implementation of health safety, and social worker.
- **Pesticide warehouse and mixing area.** Field observations related to the fulfillment of health safety as well as interviews with a warehouse clerk of safety health.
- **Clinic.** Observation First aid rooms reasonably clean condition, medical waste recording, labor medical check up and work accident.
- **Fire Fighting Equipment Storage.** Simulation the function of fire extinguishers and team readiness
- **School Facilities.** Observations related to educational facilities in the form of kindergartens, elementary schools and junior high schools.

	Stakeholder consultation with relevant agencies: <ul style="list-style-type: none"> • Head of Worker Unions of PT GKG & PT GKS • Clerk of PT GKS & PT GKG /Gender Committee • Kendawangan Kiri Village • Banjarsari Village • Plantation Agency of Ketapang Regency • Man Power Agency of Ketapang Regency • Environment Agency of Ketapang Regency • Local Contractor (FFB supplier) - CV IGVAM & PT SHK. • Gender Committee • Labor Union • WALHI (via email - no respon) • SAWIT WATCH (via email - no respon) • AMAN (via email - no respon)
2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ASA-4	Consultation of stakeholders for PT Gunajaya Karya Gemilang – Gunajaya Ketapang Sentosa was held by: <ul style="list-style-type: none"> - Public Notification at website PT Mutuagung Lestari and www.rspo.org on 21 October 2019. - Consultation meeting and interview with locals of the nearby village and ex land owner (Kendawangan Kiri and Banjarsari Village) on 5th November 2019. - Consultation meeting and interview with smallholders, local contractor, FFB supplier on 5th November 2019. - Consultation meeting and interview with Internal Stakeholder (labour union, gender committee) on 5th November 2019. - Public consultation meeting with government of Ketapang Regency conducted by phone and interview on 5th November 2019. - Consultation with NGO (Sawit Watch, Walhi and AMAN) on October, 25th 2019.
2.3.2	Stakeholder contacted
	<i>Please find appendix 1</i>
2.4	Determining Next Assessment
	The next visit (Recertification) will be determined eight months till one year after this ASA-4 .

3.0. ASSESSMENT FINDINGS

3.1. Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of **Kendawangan POM – PT Gunajaya Karya Gemilang, Bumitama Agri Ltd** operation consisting of one (1) mill and six (6) oil palm estates.

During the assessment, there were three (3) Nonconformities were assigned against Major Compliance Indicators; two (2) nonconformities were assigned against Minor Compliance Indicators and nine (9) opportunities for improvement were identified.

Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5. The company has already prepared and implemented the corrective actions that had been reviewed and accepted by Auditors in form of documentation evidences. Those corrective actions taken that consist of three (3) Major non-conformities had been closed out and shall be verified during next assessment.

MUTUAGUNG LESTARI found that **Kendawangan POM – PT Gunajaya Karya Gemilang, Bumitama Agri Ltd** complied with the requirements of Indonesian National Interpretation of RSPO Principles and Criteria 2013 by INA-NITF, July 2016 (Endorsed by the RSPO Board of Governors meeting on 30th September 2016) and RSPO Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors Revised on 14 June 2017 (Module D / E for CPO Mill).

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

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
PRINCIPLE #1 COMMITMENT TO TRANSPARENCY		
1.1	Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	
1.1.1	<p>The company has had stakeholder list that updated regularly. Based on document verification, stakeholder list as per November 2019 consist of:</p> <ul style="list-style-type: none"> • Government institution (district and subdistrict): 26 stakeholder. • Local communities (village or customary): 15 stakeholder. • Buyer or supplier: 5 stakeholder. • Smallholder: 15 stakeholder from 5 smallholder cooperative • Local contractor. 10 stakeholder. • Vendor/supplier: 7 stakeholder. • Labor union: 5 stakeholder <p>The company's also had procedure of transparency that approved since 18 July 2013. It covered the type of document that classified as publicly available document as follows:</p> <ul style="list-style-type: none"> • Company's commitment and manual. • Environmental document. • OHS and environmental program. • Report of HCV and Social Impact Assessment. • Continual Improvement Program 	

- Result of public consultation with local communities regarding environmental and social impact, HCV program including communities' aspiration.

The procedure above also described of procedure of information request from stakeholder. Personal in charge to manage communication with stakeholder is CSR Assistant as appointed by Area Controller as per 2 May 2015.

1.1.2

The company has had a procedure of communication that described the simple procedure in communication between the company and stakeholder. According to appointment letter from Area Controller on 2 May 2015, CSR assistant appointed as personnel in charge of communication. All information requested shall be responded not later than 15 days after the request submitted/accepted. The record of information request are in place.

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

The company has had list of document that can be accessed publicly listed in Transparency Procedure (BGA-SOP-GKG-0713-12-R0). The public documents, such as legal document, environmental documents (environmental policy, environmental management and monitoring report, etc), social document, OHS policy and program, annual report, and continuous improvement documents. These documents are available in estate and mill office. They also had monitoring and management report, such as OHS implementation report, report of environmental management and monitoring plan. These documents also can be accessed by public through the mechanism which has determined by the company. If there is updating of stakeholders, the company has been adding in the list stakeholders such in stakeholders list in 2019.

Based on interview with smallholders members in Kendawangan Kiri and Banjarsari Villages sighted that the company has socialized about deduction of smallholder's payment, and it can be accessed by the smallholder board or members.

Status: Comply

1.3

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

1.3.1

The company has had commitment regarding to ethical standard in their operational activity. The latest document of code of conduct has been signed by Director on 13 November 2018. As stated in Bumitama's website <https://www.bumitama-agri.com/page/layout/68/63/ethics-and-marketplace> stated:

"Integrity is one of the Bumitma's fundamental principles. By upholding the highest ethical standards, and ensuring that our dealings at all levels are free from bribery and corruption, we strive for the respect of our stakeholders and support from our communities. Our Code of Conduct is designed to guide all of our employees, including the Board of Directors and other individuals working on behalf of the company, in their dealings with business partners and regulatory bodies."

This procedure has been socialized to the all level of employee. Based on interview with estate and mill workers known that the company has implemented some ethics code with employees such as:

- Providing equal employment opportunities without discrimination based on races, ethnicity, gender, religion and position. Based on document review on employee register obtained information that the company's consist of employee from different races, ethnic, gender and religion in different position. There is an open opportunities for the employee to prove their competency and get promote.
- There is no discrimination based on races, ethnicity, gender, religion and position.
- The company always strive to create environment-friendly workplace to maintain the employees' health and safety.

Based on field visit auditor found that the company has provide prior housing complex, potable water, electricity, rices etc. worker also provide with appropriate PPE in estate and mill.

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

CH has implemented law and regulation compliance for some operational aspects, for example:

Plantation permit

The company has had plantation permit as follows:

- **PT. Gunajaya Karya Gemilang** has had plantation permit from Head of Ketapang District No.542/DISBUN-D/2013 dated 31 October 2013. Covered **9,471 Ha** and mill with throughput **60 tonnes FFB/hour**. This permit located in Sub-District of Kendawangan, District of Ketapang.
- **PT. Gunajaya Ketapang Sentosa** has had plantation permit from Head of Ketapang District 469 dated 4 December 2009. Covered **10,500 Ha** and mill with throughput **60 tonnes FFB/hour**. This permit located in Sub-District of Kendawangan, District of Ketapang.

Land and building title:

- PT Gunajaya Karya Gemilang has had 8 (eight) land title (dated 3 October 2013) certificate with total 7,439.79 Ha and 50 (fifty) land building certificate (dated 14 February 2019) with total 81.90 Ha while **24.55 Ha status is Land Building Title on Process**. Total of certification scope is **7,546.24 Ha**.
- PT Gunajaya Ketapang Sentosa has had 2 (two) land title (dated 27 June 2012) certificate with total 7,665.81 Ha while **13.55 Ha status is Land Building Title on process**. Total of certification scope is **7,679.36 Ha**.

Total certification scope: 15,225.6 Ha.

Plantation business permit

- Ketapang Regent Decree Letter number 551.31/122/01 DISBUN-D dated 4 September 2006 for PT GKG with area 12,600 Hectare and palm oil mill capacity is 60 MT FFB/hours.
- Ketapang Regent Decree Letter number 542/DISBUN-D/2013 dated 31 October 2013 for PT GKG with area 9,471 Hectare and palm oil mill capacity is 60 MT FFB/hours.
- Ketapang Regent Decree Letter number 551.31/2239/DISBUN-D dated 4 September 2006 for PT GKS with area 6,419 Hectare and palm oil mill capacity is 20 MT FFB/hours.
- Ketapang Regent Decree Letter number 469 dated 4 December 2009 for PT GKS with area 10,500 Ha and palm oil mill capacity is 60 MT FFB/hours.

Manpower

- The basic salary of worker is in accordance with the decree of Governor of Kalimantan Barat number 590/DISNAKERTRANS/2018 concerning the Minimum Wage of District and Sectoral Minimum Wages of Ketapang Regency in 2019.
- Reporting the mandatory report of Labor to Manpower Agency annually.

Best Management Practices

- Using pesticides that are registered, permitted, and the validity period is still recognized by the pesticide commission. Can be verified through the pestisida.id website in the Directorate General of Facilities and Infrastructure of the Indonesian Ministry of Agriculture
- Have adequate fire fighting facilities and infrastructure and are in ready to use condition

Environment

- The company has fulfilled Law No. 23 of 1997 concerning Environmental Management by having an environmental permit in the form of a Dokumen Pengelolaan dan Pemantauan Lingkungan (DPPL) Tahun (2010) and has carried out reporting obligations for environmental management and monitoring every semester. Reporting the environment management and monitoring report is available for the 1st Semester of 2019
- The company has fulfilled Government Regulation No. 101 of 2014 concerning the management of B3 waste by having a licensed Temporary hazardous and toxic waste material Storage Facility and in cooperation with continued licensed hazardous and toxic waste management. hazardous and toxic waste management reports are available per quarter

- The company has complied with POME management regulations in accordance with KepmenLH No. 29 of 2003 by utilizing factory POME in licensed application land. Quarterly wastewater quality monitoring reports available.

2.1.2; 2.1.3 & 2.1.4

CH has SOP of Corporate Communication & Sustainability on Identification and Audit of Fulfillment of Applicable Rules and Laws Requirements No: BGA-SOP-CCS-1102.1-R0, May 9th 2012. The procedure stated that mechanism to ensure the legal compliance is done through internal audit of law register which conducted every 6 months and/or certain time considered need. The person in charge of internal audit is different depend on the aspect, such as:

- Worker welfare aspect: Human Capital Group Department
- Environmental aspect: Corporate Communication Sustainability Department.

Besides auditing regulatory compliance, the audit also to update whether there are legal changes that can be applied in the company. Update information is obtained from newspapers, magazines, television, government agencies, internet and radio. The last internal audit for regulatory compliance was September 2019. Some of the updated regulation, such as:

- Regulation of the Minister of Agrarian and Spatial Planning No. 7 of 2017
- Regulation of Minister of Manpower No. 38 of 2016
- Regulation of the Minister of Health No. 32 of 2017
- Kalimantan Barat Governor Decree No. 590/Dinsosnakertrans/2018 about Minimum Wages, and others

	Status: Comply	
--	-----------------------	--

2.2

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

2.2.1
Plantation permit

The company has had plantation permit as follows:

- **PT. Gunajaya Karya Gemilang** has had plantation permit from Head of Ketapang District No.542/DISBUN-D/2013 dated 31 October 2013. Covered **9,471 Ha** and mill with throughput **60 tonnes FFB/hour**. This permit located in Sub-District of Kendawangan, District of Ketapang.
- **PT. Gunajaya Ketapang Sentosa** has had plantation permit from Head of Ketapang District 469 dated 4 December 2009. Covered **10,500 Ha** and mill with throughput **60 tonnes FFB/hour**. This permit located in Sub-District of Kendawangan, District of Ketapang.

Land and building title:

- PT Gunajaya Karya Gemilang has had 8 (eight) land title (dated 3 October 2013) certificate with total 7,439.79 Ha and 50 (fifty) land building certificate (dated 14 February 2019) with total 81.90 Ha while **24.55 Ha status is Land Building Title on Process**. Total of certification scope is **7,546.24 Ha**.
- PT Gunajaya Ketapang Sentosa has had 2 (two) land title (dated 27 June 2012) certificate with total 7,665.81 Ha while **13.55 Ha status is Land Building Title on process**. Total of certification scope is **7,679.36 Ha**.

Total certification scope: 15,225.6 Ha.

2.2.2

During the audit, auditor has checked the boundary poles as a land demarcation marking randomly. The result of field visit as follows:

- **Sungai Tapah Estate:** Boundary poles No. KSV 007 and KSV 008 Block H09 and Boundary poles No. KSV 010 Block I07.
- **Banjarsari Estate:** Boundary poles No. GKS 055 Block J27 and Boundary poles No. GKS 050 Block H19.
- **Seriam Jaya Estate:** Boundary poles No. GKS 151 Block R19/20 and Boundary poles No. GKS 150 Block S19.

All boundary poles are in good condition and well maintained. Based on document verification and field observations result sighted that all boundary poles in the correct locations according to the legal map (*Peta Bidang Tanah*).

2.2.3, 2.2.4, 2.2.5

SOPs relating to conflict management are still similar to the previous assessment contained in the SOP on land conflict resolution No. BGA-SOP-GKG-01-R0 dated 10 September 2014. In the procedure explains the identification of areas/potential land conflicts and land conflict resolution processes through negotiation.

Based on public consultation with relevant stakeholder (local communities, previous land owner and government agencies) obtained information that compensation process has been well-conducted by the company. All process is fair and transparent where entire document is written in Bahasa. This process also witnessed by the local government staff. There is no new compensation process since last assessment (ASA-3).

During the audit, auditor team also check the compensation document which kept by PAD Department. Each compensation document divided as per previous land owner that consist statement letter (also signed by boundaries owner and community's elder or local government staff as witnesser), payment receipt and some photos as evidence.

2.2.6

The Company has an Internal Office Memo No. 003/ASM-SUST/03/2017 dated 01 July 2017 from Deputy Regional Head which explains problem solving and conflict must be done by way of dialogue and consensus deliberation. Conflict resolution does not use force in any form. Based on interview with communities and field observations, it is known there is no indication of contractually army using in plantation area of PT. GKG & GKS.

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

There is no change of the SOP of land compensation through the FPIC process stated in the Plant and Land Growing Compensation Procedures Number. SOP-PAD-001. The procedure describes the steps in the implementation of Compensation, among others: undertaking the inventory of land to be compensated, socializing to the land-owning community, negotiating of compensation, approving management, making payments, handover of land, and documentation.

The results of the public consultation and assessment of HCV and SIA is known that there are no indigenous rights or customary rights. The individual rights within the area has been compensated in accordance with FPIC principles. Compensation process for all cultivated area are have been done in 2013 and has been verified in the previous assessment. Land acquisition documents indicated in the form of Payment Minutes of Land Acquisition, Statement Letter, Receipt of payment, Letter of Land Handover, Letter of Agreement of Land Tenure Rights, Location Map agreed to both parties and Land Management Statement Letter. The Documents and agreements shows that compensation process are done directed to the land owner.

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 shows 5 Years Financial Projection for the period 2019 - 2024 which explains the projected planted area per year of planting, achievement of FFB, OER, KER, CPO and Kernel production. CPO price projections, CPO sales projections, PK projections to production costs for the period 2019 to 2024. For example, PT GKS is targeted to produce FFB totaling 179,738 tons with a net profit of 158,765 (000,000 Idr). While PT GKG is targeted to get a nett profit of 64,127 (000,000 Idr)

One form of evaluation of the plan is when preparing the annual budget. The management of the estate and mill must compile and submit a budget for the current year. The budget will be reviewed in stages to the top management level.

Based on the distribution of planting years it is known that the age of the oldest plants is 12 years (Planting Year 2007). In the Agronomy procedure No. 17 concerning Rejuvenation section 6.1 it is mentioned that the economic age of oil palm

is 25 years before rejuvenation. Thus in the near future the company will not carry out replanting activities. The partnership pattern that exist is associated smallholder scheme. so the long-term plan in question also includes plans for smallholders such as OER targets, KER targets, production targets, and yield targets.

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

PT GKG and PT GKS are subsidiaries of the BGA group so the procedure used refers to the BGA procedure. SOP for estate have been documented in SOP Volume 1 (BGA-AGRKS-SOP-01), SOP volume 2 (BGA-AGRKS-SOP-02), and SOP volume 3 (BGA-AGRKS-SOP-03). Whereas the plant is documented in BGA-SOP-GKG 22-R0. There are also supply chain procedures (BGA-SOP-GKG-0415-29-RO).

The procedure covers the main process of the estate and mill, from land clearing, mature and immature upkeep, IPM, to harvest. Furthermore, it has also explained about FFB processing, quality monitoring to supply chain systems

Based on field observation to the block L18 / L17 division 1 STHE at the time of the circle and path spraying it was found out that workers understood how to work safely both for themselves and the environment. Workers can explain the handling of pesticides properly and procedures related to the Block Spraying System. In addition, fertilizer workers in the Q9 block of Seriam Jaya Estate can also explain the application of the Block Manuring System, such as the obligation to use PPE, management of used fertilizer sacks, and restricted areas for fertilizer application

Observations and interviews with sortation and grading officers of Kendawangan POM known workers have understood FFB criteria in accordance with established SOP.

4.1.2

Internal control in the implementation of routine SOP is carried out starting on a daily activity (by the level of supervision: Foreman, Assistant, Head Assistant, and Manager), monthly (by the Quality Control team), and Annual (by the internal audit team). In addition there is an internal audit for the application of ISPO and RSPO certification conducted by the sustainability team.

Based on the Audit Conclusion Data Sheet No.002 / IAD-Wil.1-comm / ACS / III / 2017, it is known that correction for any nonconformity are found within a maximum period of 1 month. Equipped with the rootcause analysis, corrections, and corrective actions

However, based on observed evidence such as:

- Based on information received from the management representatives of PT GKG and PT GKS, it is known that the form of cooperation with third parties includes the transportation of FFB, the transportation and loading and unloading of fertilizers and the transport of CPO / kernel.
- Based on field observation to the central warehouse known in a loading and unloading activity carried out by one of the contractors and the workers did not use PPE
- Demonstration of the importance of the use of PPE to contractor workers has been demonstrated on April 6 and November 05 2019. Also attached is evidence of transfer of PPE to 7 contractor workers for loading and unloading of fertilizer. However, a comprehensive identification and system to ensure that RSPO certification standards have not been implemented and adhered to by all contractors cannot yet be demonstrated

Thus it can be concluded that the company has not been able to demonstrate the existence of a mechanism to ensure compliance with the RSPO standard for all contractor workers, for example in terms of the obligation to use PPE, wages, health insurance and work accident insurance.

This is a nonconformity No.2019.01

4.1.3

The company has a mechanism for recording daily reports which are summarized in the report document for each unit that is compiled every month (Monthly Report). There are records of daily activities in the form of a foreman activity book made by the foreman and known by the assistant. Besides recording operational activities available in the SAP program (Product Application and Processing System), where every day the report is input from the foreman's work report, the SAP shows all items of activities carried out every day in the division, such as the use of Working Hour, production, usage material, workforce position.

One of the internal control and monitoring results can be seen from the Quality Control report as follows :

Spraying Performance Area I

Estate	Monthly SOP Index Value						
	May	Jun	Jul	Aug	Sept	Oct	To month
BSRE	88	100	97	91	100	-	95
SJYE	97	97	88	99	100	79	93
STHE	94	100	92	99	97	93	96

Manuring Performance Area I

Estate	Monthly SOP Index Value						
	May	Jun	Jul	Aug	Sept	Oct	To month
BSRE	91.7	96	-	95	95	-	94
SJYE	91.7	90	88	91	92	-	89
STHE	83	84	80	83	98	77	86

Joint Preventive Action Plan - KNDM April 2019 by the Mill Quality Assurance Department

- Station: Sterilizer

Finding: Many blowdown chamber installations have leaks including Leakage Chamber Body

Suggestion: Replace and patch all body chambers

PIC: Maintenance Assistant

Time Frame: July 20, 2019

Note: Waiting for PR pipe material no. 12009748 and number 120104019

- Station: Clarification

Finding: Sludge centrifuge no. 2 and 6 are broken

Suggestion: Centrifuge No. 2 will be fixed; No. 6 is replaced by CNC126. Centrifuge units that are not used are made minutes

4.1.4

CH has procedures for third party/supplier of FFB No: BG-SOP-SM-803.1-RO, revision: 00, valid date: 1 June 2014 explaining the plan of purchasing FFB to third party. Record of the origins of all third party FFB source that goes into the factory through weighbridge has been well recorded and classifies each of the suppliers of FFB by coding, such as:

- Usaha Bersama Cooperative
- Karya Bersama Cooperative
- Binasari Cooperative
- Sawit Bersama Cooperative
- Rimba Sari Cooperative
- Fajar Mandiri Cooperative
- Sawit Makmur Cooperative
- CV IGVAM
- CV Mitra Djaya Abadi
- CV AAA
- CV Rio Gunung Panjang

4.1.2 Status: This is a nonconformity No.2019.01

Open

4.2

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

4.2.1 & 4.2.2

The company has SOPs for Good Agricultural Practices (GAP) in managing soil fertility listed in BGAAGRS-SOP-01 SOPs volume 1 and volume 2 regarding:

- Soil and Water Conservation (SOP-05)
- Legume Cover Crop (SOP-06)
- Manuring (SOP-09)

Information about the fertilizer record can be seen in the manager monthly report (physical). In the October report the following fertilization achievements were announced:

Estate	Fertilizer	Program (Ton)	Realization	FFB Production (Ton)	Fertilizer/Ton FFB
SJYE	RP	739	702	61,110.34	0.01
	Urea	781	310		0.005
	MOP	1347	1078		0.017
	Borate	52	9		0.00014
	CuSO4	2	0		-
	Dolomite	6	0		-
	ALSD	405	401		0.006
	Palmo	159	40		0.0006
	RP	462	451		0.010
	TSP	14	0		-
STHE	Urea	629	308	44,156.67	0.0069
	MOP	1,022	573		0.012
	Borate	38	38		0.0008
	CuSO4	14	14		0.0003
	Dolomite	311	257		0.005
	ALSD	104	104		0.002
	RP	624	580		0.0115
	Urea	804	431		0.008
	MOP	1,238	1,218		0.024
	Borate	48	28		0.00056
BSRE	CuSO4	1	-	50,006	-
	ALSD	708	468		0.009

Based on the report, it is known that fertilization of TSP, CuSO4, and Dolomite has not been implemented. TSP has been substituted with RP. Whereas CuSO4 has been substituted palmo. Explanation from PT GKG and PT GKS RnD staff is known that the fertilization program will be completed no later than the second week of December.

Based on the field observation and interviews with manuring worker in blocks I14 and I13 division 4 STHE and block Q9 SJYE it is known that workers have been able to explain well about the implementation of Manuring SOP starting from the application of fertilizer on the right dose, on target and handling equipment and Hazardous and Toxic Material contaminated goods after conducting fertilization. In block I14, MOP was carried out at a dose of 1.75 kg / oilpalm while in block Q9 used a dose of 2 kg / oilpalm.

4.2.3

Soil and leaf sampling is carried out in accordance with IOM, which is carried out annually as a basis for fertilizer recommendations. The Soil and Leaf Sample Test was last carried out in 2018 as a basis for recommendations for the preparation of the 2019 fertilizer that was carried out by the Analysis Laboratory of the BGA Group Research Department.

- The company has issued the Leaf Analysis Results of regional 4A in 2018 issued by the Research Department of PT BGA by the Research Department of PT BGA. The test parameters include the results of the Leaf Parameter Analysis (percentages of N, P, K, Mg, Ca and ppm elements B and Cu). In addition there are also nutrient status (N, P, K, Mg, Ca, B, Cu) which are divided into categories of low, optimum, high, and moderate

- The 2018 Soil Analysis Results released by the Research Department of PT BGA. Analysis parameters include pH H₂O, C-Organic, N-Total, P-Total, Ca-dd, Mg-dd, K-dd, and KTK NH₄⁺

4.2.4

The company has implemented nutrient recycling by using empty fruit bunch and liquid waste or POME as a way to improve soil fertility. Kendawangan POM also utilizes fiber and kernel shells as boiler fuel material.

EFB (Empty Fruit Bunch)

- STHE: Plan 11,438 Tons Realized 7,895 Tons
- SJYE: Plan 5,509 Tons Realization 3,399 Tons

POME (Palm Oil Mill Effluent) : 147,718m³ as October 2019

Based on the field observation to the block O24 SJYE, it is known that the EFB application is carried out in a circle in a interrow area at a dose of 250 - 300 kg / oilpalm. In addition, the results of the field visit in the Land Application area in KNDE revealed that the POME application was in accordance with the plan set. There is no runoff of wastewater and flatbed in good condition.

Status: Comply

4.3

Practices minimize and control erosion and degradation of soils.

4.3.1; 4.3.2; 4.3.6

Critical soils identified in the PT GKG and PT GKS areas are Deep Sand, Spodic Sand, Kaolin, Laterite, Slope > 8%, Lowland, Peat, and Tidal. The management strategy as stated in the Marginal Land Management SOP, document number BGAAGRS-PTKS-PLM, critical land management is carried out by adding nutrients such as those originating from empty beds that are applied to sandy areas.

In addition there are SOP for Management of Areas with High Erosion Potential (Document number: BGA-SOP-CCS-113 in 2012). In this SOP describes management actions taken by the company by:

- Maintain land cover well in areas with high erosion potential
- Plant cover crop
- Installation of buffer zone border and sign board

Realization of the management of marginal areas, for example with the application of EFB in O24 SJYE block and the making of terraces on sloping areas. In addition, selective spray by allowing nephrolepis to grow is also part of a strategy to maintain soil moisture. For peat management, it can be seen in the H14 STHE block by making drainage, water gate, and weirs for water management and the instalation of peat subsidence.

4.3.3

Road maintenance programs are included in the Annual Work Plan which is then breakdown into monthly work plans. The realization of the plan is contained in the manager's monthly report. Monthly manager's October 2019 report includes information on the realization of road maintenance as follows:

Program and Realization of Road Maintenance

Estate	Plan (Meter)			Realization (Meter)		
	CR	MR	Boundaries	CR	MR	Boundaries
STHE	15,093	16,618	1,302	15,093	16,618	1,302
SJYE	115,700	43,350	-	115,700	43,350	-
BSRE	1,060	175	-	1,060	175	-

Based on field visits to blocks Q21, Block Q9 and O24 SJYE blocks as well as H14 blocks and L18 STHE blocks, it is known that the road conditions are good and can be passed by vehicles easily. Especially FFB transport trucks

4.3.4

Peat management is carried out by the company by conducting water management and monitoring of peat subsidence. There are monitoring and measurement results as follows:

Peat Subsidence

Blok	Tahun					
	2014	2015	2016	2017	2018	2019
H14 (cm)	4.9	10.3	11.9	13.7	15.76	20.00
I16 (cm)	Not Installed				1.72	5.20

*the number listed is a decrease in total

Water Level
Blok I16

Bulan	Tinggi (Cm)
Jan	35
Feb	6
March	5
April	10
May	20
June	32
Jul	69
Aug	92
Sept	92
Oct	90

Blok H14

Bulan	Tinggi (Cm)
Jan	20
Feb	15
March	5
April	20
May	24
Jun	38
Jul	80
Aug	106
Sept	115
Oct	100

Historical Rainfall (January - October 2019)

Estate	Description	Jan	Feb	Mar	Apr	Mei	Jun	Jul	Agst	Sep	Okt
STHE	RF	235	237	147	248	219	99	12	7	58	211
	RD	18	14	10	12	11	2	1	1	2	13

*RF : Rainfall

*RD : Rainy Day

Based on the data, it is known that the subsidence of peat in blocks I16 and H14 STHE since the pole was first installed in 2014 was 20 cm. Whereas the subsidence pole in block I16 were first installed in 2018 with a total reduction of 5.20 Cm. The decrease is still within the threshold of peat damage as written in the Minister of Environment Regulation No. 7 of 2006 which states the quality standard of damage is 35cm / 5 years

For the management of water level, the source of water is from rainfed so it is difficult to maintain the position of water at 50-70 cm in the dry season. However, water gate and weirs are still being made to maintain the water level. Based on monitoring the measurement of the water level of the driest period is September where the water level is 115 cm while the wettest period is January with a water level of 5 cm. After monitoring the rainy day it is known that in January there are 18

Rainy Days while in September there are 2 rainy days.

Based on the field observation to the block H14 STHE, it is known that peat management has been carried out in accordance with procedures

4.3.5

The company has not plan to replanting for current time. The old year palting on 2007, so plan of repalnting will be conducting for long time (1st cycles of plant).

Status: Comply

4.4

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

4.4.1

CH has developed water management plan referring environment document year 2010 (DPPL). The plan consists of routine test of clean water and river water quality, water management of peat land, riparian area management and land application with effluent quality routine test. Management of water use efficiency, the mill has monitoring routinely its water use for FFB process. The current water use is still in accordance with water use budget set by the mill.

CH has water management strategy such as:

- Outlet normalization and drainage function and culvert connectors
- Determine the drainage zone based on the topography
- Determining the location, number and size of water gates based on drainage zone containment volume
- Maintain the water level of the ditch in the 30 - 50 cm block by creating water springs or embankments in a ditch that does not function as an outlet

Base on EIA report 1st Semester of 2019 such as water testing on May 17 2019, it was informed that the company activity has not affect is already the standard required (PP No. 82/2001 Class 2). Domestic housing well and reservoir water testing on May 17 2019 shows that all parameters are less that the detection limit indicated by Minister of Health Regulation (*Permenkes*) Number. 416 1990, respectively.

4.4.2

CH has identified its water source presented in E.I.A document and HCV year 2012 identification document such as riparian at Tapah river and riparian at Tengar river. Based on field visit in riparian area Tapah river Block L 25 B Kendawangan Estate known that there is border sign of riparian area, sign of no chemical application in riparian area and the riparian is naturally vegetated. Natural Re-vegetation of plants has been implemented as evidenced by the border areas that have begun to grow natural vegetation.

4.4.3

POME are processed first in the WWTP pond and Based on the waste pond layout, Kendawangan Mill has 8 WWTP pond. The company has managed its effluent of FFB processing as regulated. Document review shows there is monthly effluent quality against national regulation for waste that is discharge to land application.

Permit of effluent utilities was accordance decree regent Number 862/KLH/-B/2015 dated 29 December 2015, valid for five years. The POME quality test result by accredited laboratory shows for period July to September 2019 that the effluent quality especially BOD, pH and COD has fulfil the standard required Minister of Environment Decree (*KepmenLH*) No. 28 year 2003. Base on field visit in Kendawangan POM, no indication over flow effluent in WWTP, flow meter was well functioned and there is no issues from stakeholders related to land application.

4.4.4

The company has recorded its actual water use. The average water use per tonne FFB for period of January to September 2019 is 0.95 m3/ton FFB from budget 1.30 m3/ton FFB.

Status: Comply

4.5

Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated

Pest Management techniques.
4.5.1

IPM Found in an annual work plan that is broken down into a monthly work plan. The IPM plan emphasizes census and monitoring results before making a decision to carry out further control.

Potential pests identified based on detection and census forms are Palm Leaf Eating Caterpillar, Oryctes, and Rat. By implementing IPM, it is expected that the use of pesticides can be minimized. At least every decision on the use of pesticide will always be based on census results and monitoring the level of pest infestation. During the period 2018 and 2019 there was no use of rodenticides or insecticides. This indicates a commitment to the minimum use of pesticides. Decisions on the use of pesticides are always based on the results of evaluations of pest infestation rates

Summary report on pest and disease observations by the Research Department of PT GKG and GKS

Average infestation January - October 2019 :

Estate	Pest Infestation (%)					
	Oryctes	Tirathaba	Rat	Termite	Caterpillar	Ganoderma
STHE	0,1	0,1	1,8	0,1	0,0	0,0
BSRE	0,1	0,05	2,8	0,1	0,0	0,0
SJYE	0,1	0,02	3,3	0,1	0,00	0,00

As part of the IPM the company has also carried out biological control by using barn owl and planting beneficial plants. Records of the implementation include:

Tyto Alba Observation Report in 2019 by the Research Department of PT GKG and GKS in October 2019:

Estate	Nest Box	Active	% Occupation	Egg	Owlet	Owl
STHE	24	10	42	7	8	18
BSRE	33	26	79	4	17	29
SJYE	28	10	36	15	4	10

In addition, on the right and left side of the CR, MR is also planted *Turnera subulata* as seen in blocks Q9, L18. And I13. Based on field observation to block Q12 SJYE and block I13 STHE known the nest box is in good

4.5.2

The company has conducted training for workers involved in the integrated pest control management, for example:

- Training on Plant Pests and Diseases on September 6, 2019, attended by 25 participants. The training was carried out by Bayer Crop Science and assisted by the PT GKG - GKS Research Team
- Plant Pests and Plant Training on July 25 and October 25, 2019 at KNLC (Kendawangan Learning Centre) and participated by a total of 25 participants

In the minutes of the training, it was found that the material delivered ranging from potential pests of palm oil, the concept of detection and census, the value of the control threshold, to the procedures for decision making. Based on interviews with BSRE and STHE census officers it is known that officers have been able to explain about the implementation of integrated pest management starting from the detection and census activities. If the level of pest infestation exceeds the threshold of control then control can be considered using pesticide.

Status: Comply

4.6
Pesticides are used in ways that do not endanger health or the environment
4.6.1 & 4.6.2

The selective use of the product is listed in the Weed Control SOP (BGAAGRKS-PTKS-PGL) and Pest and Disease Control (BGAAGRKS-PTKS-PHT) which was approved by the top management (Director) on January 4, 2011. The company has set the control for pests / weeds use certain ingredients that have been recommended.

Based on the recapitulation of PT GKG and PT GKS pesticides use; known in the period 2019 the types of pesticides

used are as follows:

Trademark	Active Ingredient
Rose-Up	Glyphosate
Metaprima	Methyl Metsulfuron
Basta	Amonium Glufosinat

Based on the verification to the pesticide registration system (pesticides.id) it is known that the three pesticide brands are still valid. Based on the field observation to the block Q20 SJYE and Block L17 Division 1 STHE, it is known that spraying worker have understood selective spraying of weeds. For example the use of glyphosate for soft and broadleaf weeds. The worker also said that he had never used parakuat.

Records of the use of pesticides as contained in the manager's monthly report (physical) include the following:

Estate	Pesticide	Amount	UoM	Application (Ha)	pesticide/ha
SJYE	Glyphosate	2,535	Liter	12,717.37	0.19
	Methyl Metsulfuron	55	Kg		0.004
	Amonium Glufosinat	1,004	Liter		0.079
	Glyphosate	1,773.66	Liter		0.13
STHE	Methyl Metsulfuron	164.63	Kg	11,702	0.01
	Amonium Glufosinat	706.58	Liter		0.06
	Glyphosate				

* Period January - October 2019

* LD50 information is available on each product's MSDS

4.6.3

The Integrated Pest Management Plan can be seen from the Monthly Estate Work Plan. A routine implementation is a census den detection program. If the results of the census indicate a number that exceeds the threshold of control, then pesticides will be controlled. Monitoring the effectiveness of pest control is carried out by the research department in coordination with the estate staff.

Explanations regarding minimizing the use of pesticides and the implementation of IPM are detailed in 4.5.1. There is no prophylactic in the use of pesticides. The application of pesticides is always based on the results of the PPD (Plant Pest and Disease) census.

4.6.4

The company has a complete list of pesticides belonging to WHO category 1A and IB which is kept by the sustainability team. There is Internal Agriculture & Technical Circular No. 016 / IOM / RSC / I / 2015 dated May 9, 2015 concerning Herbicide Recommendations 2015 which recommends that IA and IB (Paraquat) herbicides are no longer used in controlling weeds.

At the time of ASA-4 the use of pesticides class 1A and 1B had been minimized, for example the Parakuat was last used in 2015 while the brodifacoum was last used in 2016. Based on the results of a field visit to the pesticide storage warehouse, physical stock was found to be the same as written on the warehouse card. There are no active ingredients of parakuat that are stored.

4.6.5

The company has the following SOP on handling pesticides:

- Pesticide Management SOP document number BGAAGRKS-SOP-14 / BGAAGRKS-PTKS-PPS
- Pesticide Safety Instructions Procedure, document number BGAAGRKS-PROS-PPS-01
- First Aid Work Instructions Against Pesticide Poisoning, document number BGAAGRKS-INTR-PPS-01

Based on interviews with the spraying team Training for workers has been routinely carried out during the morning briefing at least once a month. Documented training records for example:

- Training on Spraying Technique, OHS, and handling of pesticides on August 27, 2019, was attended by 17 participants from representatives of the foreman and the pesticide applicator
- BSS training on June 3, 2019 was attended by 22 members of the SJYE spraying team
- Minutes of the BSS PPE Work Simulation on October 19, 2019, participated by 24 BSS teams

Training materials include procedures, PPE, OHS and handling of pesticides

The pesticide applicator belongs to the spraying team which is a special person who has received training in safe working. Based on interviews with officers in the block L18 STHE and block Q20 SJYE, it was known that workers understood how to handle pesticides. The worker said that the mixing and washing of equipment was carried out at the BSS house, required to use PPE, not to spray on river borders and reservoirs and to store PPE in a special place provided

The application dose refers to the product label. MSDS is available for each pesticide product. PPE used include masks, aprons, boots and face shields. An examination of compliance with PPE use is carried out every morning when going to the field

4.6.6

Based on interviews with employees and foreman of SJYE and BSRE pesticide applications it is known that all used pesticide packaging containers are returned and sent to Temporary Hazardous and Waste Material Shelter and are not used for any other purpose other than pesticide application activities. Used packaging containers, work tools and work clothes are all stored in a special storage area. Thus there are no contaminated items brought home. The results of observations at the employee's housing note that no pesticide packaging was found disposed of in a landfill and not used for other purposes such as trash cans, flower pots, etc.

4.6.7

Training in handling pesticides has been explained in 4.6.5. Based on the field observation it is known that there are pesticide mixing and storage houses. During the circle and path spraying activities in the block L18 STHE and the block Q20 SJYE, no pure pesticides were brought to the field. Mixing pesticides into sack knaps using a dose and contained a bucket to avoid contamination of the soil.

4.6.8

Based on the interviews and field observations, it is known that there is never any application of pesticides by air. The results of the field visit to the central warehouse also found that there were no facilities and infrastructure to apply pesticides by air.

4.6.9

The company can show BA Socialization and simulation of Pesticide MSDS to warehouse officers on November 7, 2019 at Seriam Jaya Estate which is equipped with photos of activities and attendance documents. The results of field visits, personal protective equipment, work tools and containers used for pesticide spraying are stored in the pesticide storage warehouse after being rinsed first. There are no used containers that can be reused or brought home.

4.6.10

CH has a Waste Management procedures Number. BGA-SOP-CCS-1101.1-R0 published August, 2011 explained that the ex pesticide containers that have been washed save to hazardous waste storage. ex pesticide containers that are transported by transporter licensed recorded in the manifest of delivery.

The record management Hazardous Waste, included in reporting management hazardous waste quarterly period July to September 2019 to environment agency. The training and socialization to spraying workers, about ex pesticide container disposal. All discarded containers of chemicals generated by Estate and Mill, placed in hazardous waste warehouse.

Based on interview with Pesticide Applicator the Block L18/L17 division 1 and Pesticide warehouse Sungai Tapah Estate, they understand the mechanism well. In housing complex, ex pesticide waste has been handled well and observation on plantation block and workshop show that there is no agrochemical ex-container in the plantation working area.

4.6.11

Certificate Holder have regularly medical check up for pesticide operators. Based on document verification sighted that STHE has 30 pesticide applicators, BSRE has 34 pesticide operators and SJYE has 30 pesticides applicators. All of pesticide applicators fit to work and good health. Based on interview with pesticide applicator in the STHE, BSRE, and SJYE sighted that there are no poisoning symptoms and skin irritation.

4.6.12

The CH has a policy that prohibits pregnant and breast-feeding women working with chemical material. Monitoring of pregnancy for spraying and manuring worker is conducted every month on estates, for example: pregnant monitoring was conducted in STHE and BSRE dated 24 April 2019 and 5 August 2019 respectively. During last year there are two pesticide applicators who transfer to the manual weeding activity, such as: on behalf MHD and RFN on division 1, BSRE. Based on interview with pesticide applicators in STHE, BSRE and SJYE sighted that there are no pregnant and breast-feeding women working with chemical material.

There are several nonconformities with **NCR No 2019.02**.

1. The CH has conducted medical checkup for pesticide applicators dated 4 July 2019, for example STHE: there are 23 pesticide applicators, however it only 13 applicators who followed medical checkup.
2. Based on interview with the paramedic that the medical checkup for pesticide applicators and fertilizing applicators was conducted by sampling on this year, it consider date of joint with the company. Other than that, he was explaining that the full medical check up for that sample workers such as: Hematology, cholinesterase, macroscopic and microscopic urine.

However, the CH has not been able to show that all pesticide applicators followed on annual medical checkup.

4.6.12 | **Status: This is a nonconformity No.2019.02**

Open

4.7

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

4.7.1

Certificate Holders has a policy of occupational safety and health were written in Bahasa. The policy has been legalized and updated on January 2015 by Area Controller of PT GKG. This policy is designed to control hazards in every activity that is in the working environment to prevent accidents and occupational diseases. Management have work program of occupational health safety every year. Realization of the program of work will be monitored through regular meetings Guiding Committee of Occupational Safety & Health every month. This work program applies generally to all workers in the workplace. The CH to be consider to follow up the medical check up result in accordance to the predetermined schedule. (OFI).

4.7.2

Certificate holders shown the document of hazard identification, risk assessment and risk control which issued on 10 July 2018. It will be reviewed if any occupational accident happen. The document describes the description/activity, potential hazards, risk assessment and risk control. Identified activities already cover all existing activities on the mill and estates. However the CH have opportunity for improvement (OFI), as follows:

1. The CH already evaluated the HIRAC every year, for example: the estates unit dated 24 June 2019. Based on the work accident report in 2019 there were four snake bite incidents on estates of PT GKS. The company to be consider to evaluating the potential danger of snakebites in the all estates operations.
2. The potential hazard of pesticide applications is chemical exposures to body. Risk control is PPE's providing to all workers. The CH to be consider to explaining the specific PPE's type.

4.7.3

Based on documents verification and interviews, it is known that all operators at Kendawangan Mill, STHE, BSRE, and SJYE already have license, such as boiler operators, welders and electrical technician. Based on the results of field visits it was found that workers had used PPE's in accordance with HIRAC. For example, pesticide applicators have used PPE (face shield & helmet, masks, rubber gloves, aprons and rubber shoes). Moreover several operators on KNDM are using ear plugs, safety helmets, masks and safety shoes.

Based on field visits and interviews with several workers on the mill and estates sighted that company providing adequate PPE's. If there are damaged, it can be replaced immediately. The CH also showing PPE's distribution documents to the workers and the workers recognition from interviews also confirmed it. The company has identification documents for the use of personal protective equipment based on Document No. FRM 01 / SOP 03 / EHS (2) / 1109.

The CH to be consider to evaluate frequency of PPE condition inspection, moreover it consider to evaluate PPE's distribution system from the Metro Kendawangan Central Store to the each of estates. (OFI).

4.7.4

Certificate holders already has persons that responsible for the OHS program within the OHS Committee established in PT GKG and PT GKS, and it has has been approve by Manpower agency of Ketapang Regency dated 22 October 2019 in accordance to Decree Letter number 187/NAKER/TAHUN 2019 and number 188/NAKER/TAHUN 2019 respectively. The OHS expert has license from the Manpower Minister No KEP.6719/NAKER-BINWASK3/VI/2019 dated 13 June 2019 and No KEP.6725/NAKER-BINWASK3/VI/2019 dated 13 June 2019 respectively.

The organization has conducted monthly meetings on OHS issues in the workplace. The minutes of the meeting were recorded and stored well. Based on interviews to workers who are members of the OHS Committee it is known that monthly meetings are always routinely conducted to discuss about OHS such as consistency of PPE usage, work accident report, fire simulation, checking of emergency response equipment, OHS signboard, cleanliness of work area, etc.

4.7.5

Certificate holders has procedures for Emergency Preparedness and Response and Recovery of Emergency (BGA-SOP-GKG-0413-2-R0). The procedures cover the main potential causes of emergencies such as fires, chemical spills. Based on document verification sighted that fire simulation was conducted dated 6 February 2019 in Metro Kendawangan. Moreover simulation was performed to know the preparedness of emergency response equipment in the POM with result of the simulation the hydrant tool is ready for use.

Each of estates and mill has already licensed first aid officers and there was first aid internal training conducted on 17 – 19 July 2018 and 7 August 2018 in Kendawangan Learning Centre with 81 participants. Based on field observations in KNDM, STHE, BSRE and SJYE sighted that first aid kits item is according to the national regulation. An officers on each unit were understood about first aid mechanism.

4.7.6

Based on the Collective Labour Agreement (CLA) that workers have the right to receive medical care and be protected by the accident insurance company. The management unit show proof of payment Health and Employment Workers Social Security Agency (BPJS).

There are non conformity with minor category number **NCR 2019.03**, as follows:

1. Based on list of workers on October 2019 there are 1,683 workers in PT GKG and 1,826 workers in PT GKS.
2. Dues of *BPJS Ketenagakerjaan* of PT GKS on October 2019 has been paid dated 15 October 2019 for 1,791 workers.
3. Dues of *BPJS Ketenagakerjaan* of PT GKG on October 2019 has been paid dated 15 October 2019 for 1,568 workers.
4. Dues of *BPJS Kesehatan* of PT GKS on October 2019 has been paid dated 10 October 2019 for 181 workers and 237 person in their family.
5. Dues of *BPJS Kesehatan* of PT GKG on October 2019 has been paid dated 10 October 2019 for 290 workers and 536 person in their family.
6. Dues of *BPJS Ketenagakerjaan* of PT GKG-Mill on October 2019 has been paid dated 15 October 2019 for 131 workers.
7. Based on interview with HR Regional-4A Assistant sighted that registration of *BPJS Kesehatan* for the workers and their family will be gradual. For example: registration on behalf mr SDK in KNDM dated 29 October 2019.
8. Based on monitoring data there are 13% from 3,509 workers and their family had been register on the *BPJS Kesehatan*.

The CH has not been able to show that all workers been registered on the health insurance.

4.7.7

The certificate holder is still consistent in monitoring the recording of occupational accidents by calculating the lost time accident (LTA) on January – October 2019. Recapitulation of work accidents with a formula to find the level of severity and frequency of accidents. This document informs the time period, the number of working days, the number of non-effective working days, hours of work in total, the number of accidents, the number of working days lost, the number of accidents a year, lost days a year. Calculation of SR and FR is reviewed regularly and monitoring will be evaluated at the monthly meeting of Committee of Occupational Health and Safety. Based on document verification sighted that there is 12 accident cases with 19 man day's lost in PT GKG, and also there is 3 accident cases with 3 man day's lost in PT GKS. There is sample of compensation of death on behalf BMH, it causes traffic accident on Block K18/K19, STHE to the KNDM dated 15 March 2019. It has been paid to the heir on April 2019.

4.7.6 Status: This is a nonconformity No.2019.03

Open

4.8

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

- The company has Inter Office Memo No. 020 / IOM-C / BCU-BGA / V / 2018 dated 21 May 2018 regarding the approval of in-house training for mandatory certification.
- The 2019 Community Partnership work program includes also socialization and training programs for plasma.
- Company has had training program for worker in the period of 2019. The training is targeted for all workers, including staff, permanent workers, and contract workers. The training program such as socialization of company policy, best management practice in estate and mill, training related to OHS, emergency response, etc. The training that held in 2018 has documented in minutes of meeting, list of attendees, and activity photos.

4.8.2

Company has showed the documentation of training whether it is internal or external training. For example

- Socialization of the commitment to implement the RSPO and SCCS on January 18, 2019.
- Socialization of HIRAC, first aid, PPE on July 20 2019.
- Training of firefighters, extinguisher and emergency response on August 10 2019.

Documentation of training is recorded in form of list of attendees, minutes of meeting, and activity photos. Based on interview with workers in Kendawangan Estate, Sungai Tapah Estate, Banjarsari Estate, Seriam Jaya Estate and Kendawangan Mill, they have received several training from company such as best management practice, OHS, first aid training, and socialization of company policies and procedures.

Training records for each worker in the training monitoring document, for example training records for foremen of sprayers received training: leadership training & agronomy techniques for spraying activities on October 10 2019.

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

- PT Gunajaya Karya Gemilang (PT GKG) has an Environmental Management and Monitoring Document (DPPL) with a broad scope of activities of 10,000 Ha with a processing plant capacity of 60 tons of FFB / hour. The DPPL was approved by the West Kalimantan Province AMDAL Appraisal Commission with Decree Number: 362 / BLHD / 2010 and approved based on Decree of the Governor of West Kalimantan Number: 562 / BLHD / 2010 on December 13, 2010.
- PT Gunajaya Ketapang Sentosa (PT GKS) has an Environmental Management and Monitoring Document (DPPL) with a broad scope of activities of 10,000 Ha with a processing plant capacity of 60 tons of FFB / hour. The DPPL was approved by the West Kalimantan Province AMDAL Appraisal Commission with Decree Number: 361 / BLHD / 2010 and approved based on Decree of the Governor of West Kalimantan Number: 561 / BLHD / 2010 on December 13, 2010.

- Based on the DPPL, the company is obliged to carry out environmental management and monitoring, including aspects related to:
 - 1) Social unrest
 - 2) Decreased air quality and increased noise
 - 3) Decreasing river water quality
 - 4) Increased rate of soil erosion
 - 5) Potential land fires
 - 6) Reduced diversity of flora and fauna
 - 7) Job and business opportunities
 - 8) Increase in income
 - 9) Public health

5.1.2 & 5.1.3

PT GKG and PT GKS have an environmental management plan that is described in the 2010 Environmental Management and Monitoring Document (DPPL). The Environmental Management and Monitoring Document (DPPL) does not identify the person responsible, but the company has appointed a PIC to carry out environmental management activities. Dian Indra Praja as Sustainability Specialist Region 4A and 4B through SK Regional Head 4 No. 001 / HRD-WIL 6 / SK / X / 2018 dated October 9, 2018.

The 2010 Environmental Management and Monitoring Document (DPPL) has combined management and monitoring plans including monitoring mechanisms / procedures. There have been changes / additions to the monitoring activities due to operational changes such as the monitoring of liquid waste in land application activities, monitoring of stationary disturbances in factory operations.

Environmental management and monitoring activities are carried out periodically every 6 months (semester). As well as an evaluation / review of the effectiveness of management. The company has an environmental management implementation contained in the implementation documents of RKL-RPL for the first semester of 2019 for PT GKG & PT GKS, respectively.

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

CH has conducted HCV identification covering HCV in the company area and located identified HCV area in its operational area and the surrounding area. The identification was conducted by independent consultant with Lead Assessor has been approved by the RSPO. The HCV in PT GKG are in form of riparian area of Tapa River, riparian area of Anak Sungai Tapa, riparian area of Tengar River, riparian area of Anak Sungai Tengar, riparian area of Canal IV, swamp block I23 – I25 and 'Kayu Ara" area. Meanwhile, HCV area in PT GKS are in form of riparian area of canal MB-2 and MB-3, forested area in block H15, Islamic Cemetery 1 and Islamic Cemetery 2. The identification of HCV in PT GKG and PT GKS has involved the surrounding community with evidence of FGD implementation, among others by representative of Kendawangan village community, Banjarsari village and hamlet of Membuluh 2.

In PT GKG, the identified RTE fauna species are *Hsytrix brachyuran*, *Hystrix brachura*, *Anhinga malogasterr*, *Bulbucus ibis*, *Egretta sacra*, *Falco cenchorides*, *Nectarina jugularis*, *Pelargosis capensis* and *Spilornis cheela*. And RTE flora species is *Shorea balangeran*.

Based on the HCV map of PT GKG it is known that the total HCV area within the Land Title (HGU) is 75 ha as follows

- Tapah river of 10 ha
- Creeks Tapah river 5 hectares
- Tengar river is 8 ha
- Creeks Tengar River is 13 ha
- Membuluh 2 River area of 15 ha
- Membuluh 3 River area of 24 ha

5.2.2 & 5.2.3

In accordance with the identified RTE species in PT GKG operational area, the company has developed HCV management plan to protect HCV area and RTE species. The plan also stated in HCV management and mitigation plan for threat to HCV. Management plan document period of 2019 are the development of flora and fauna protection procedure, monitoring on HCV area and RTE species and socialization of HCV and RTE species protection. Based on field observation, there is no interference at the HCV area. The HCV patrols are performed every month.

Based on field observation on riparian area of Tapah river Block L 25 B Kendawangan Estate known that the HCV area has been managed well and in accordance with the management plan. The company was able to shows monthly monitoring of fauna and monitoring/maintenance of marking HCV pole which conducted weekly. It was reported that there were no conflict between human and wildlife.

PT GKG 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 (refer to major 5.2.2). The policy of sanction for employee who disobey RTE protection is delivered in Internal Office Memo of Estate Controller of Area 6 No. 011/GKS-Sust 6/VII/2016 dated 1 July 2016. Based on interview with mapping officer known that the company has socialized on HCV and RTE species protection including the sanction given for disobeying the company protection effort.

Based on interview with surrounded community, harvesting and spraying workers mention RTE species in operational area. RTE species within estates operational areas which also informed by signboard. Moreover, there were no protected fauna on estate offices and housing complex.

5.2.4

The company was able to shows evidence of receipt note document of flora and fauna identified in to relevant Agency. Monitoring of RTE species has been conducted routinely (every quarterly), the monitoring result will be the input in the next monitoring plan. According to document review seen that record of protected species is regularly monitored. evaluation feedback from monitoring result i.e.:

- Maintenance of HCV signboard on August 3 2019.
- The realization of HCV rehabilitation / enrichment program has been realized for period 2018 to 2019.
- Socialization to employees is done once every 6 months and once a year.
- Patrols of HCV area are performed every month

There was a land fire in the HCV area in block I22 division 2 September 2 2019 at 14.25, as explained in the minutes of fire No.002 / GKG / KND-BAK / VIII / 2019. Extent of burned area 8 Ha. It is estimated that the first hotspot from the forest (HCV area). The company has the opportunity to increase the frequency of monitoring land fires in the HCV area in the drought season, due to frequent fires in the HCV area. **OFI number 6.**

5.2.5

Based on document review known that there is HCV area located outside the company HGU and it has a cultural value for Dayak community surrounding. The company has maintained the area well and it is accessible for the community to use the area for their cultural ceremony. Further, there is no issue from community during the public consultation on HCV area management by the company.

The company has shown a letter of agreement on the management of the HCV area outside the HGU with nearest community September 26 2018, by CH, Area Controller 6, and village head. The contents of the agreement are:

- Maintenance biodiversity and ecosystems.
- Maintenance environmental pollution.
- Prevent fires in the HCV area
- Planting, economical plants like *rambutan*, *durian* and *cempedak*.

Status: Comply

5.3
Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.
5.3.1

The company has identified the sources of waste and sources of pollution resulting from the operational activities of POM and the Estates, including: Sources of waste from the Estate are: weed spraying activities, washing of spray equipment and PPE, fertilizing, land application, maintenance, FFB transportation, workshops, Temporary hazardous and toxic waste material Storage Facility, warehouses, clinics, housing / mess, and other public facilities. The sources of waste from the factory are: FFB processing activities, maintenance of production equipment, chemical warehouses, Temporary hazardous and toxic waste material Storage Facility, housing / mess and public facilities

5.3.2

The result of inventory in Kendawangan POM and Estate such as spray activities produce waste, such as former pesticide container placed in hazardous waste warehouse, preparation and maintenance block mark, such as former paint cans, placed in hazardous waste warehouse, plastic waste fertilizer, placed in hazardous waste warehouse. And then in Kendawangan POM such as activities in the loading ramp, used sacks lose fruit placed in landfill, in WTP, Waste resulting is ex chemical container placed in hazardous waste warehouse.

The company has permitted hazardous waste storage from Head of Ketapang District Decree No.291/PerkimLH-D/2017 dated 30 May 2017. There is hazardous waste handling mechanism from the hazardous source in estate and mill to the permitted hazardous waste. Record management hazardous waste, included in reporting management hazardous waste quarter period addressed to environment agency. The training and socialization to spraying workers, about ex pesticide container disposal is available. CH has agreement with permitted third party to transport and dispose hazardous waste and the last hazardous waste handling

5.3.3

Record management Hazardous Waste, included in reporting management hazardous waste quarter period April to June 2018 addressed to environment agency. Hazardous waste management recorded several documents, consist of:

- Company has Logbook (Hazardous Waste Warehouse)
- Company has Balance Hazardous waste warehouse reported
- Company has Agreement Letter, PT Bank Sampah Indonesia for transporter Hazardous waste
- Company has shipping manifest Hazardous waste warehouse.

Base on field visit in temporary storage hazardous & toxic waste PT GKG and PT GKS there is a material safety data sheet, oil traps, fire extinguisher, first aid kit, emergency shower. Based on Interview with officer of hazardous waste the officer has been known related management in accordance with procedure of hazardous & toxic waste.

Base on field visits in the boiler station any a fiber and shell is used as fuel. Remaining fiber shell and placed so did not result in pollution and potential fire.

From processing operations in mill also produce waste in the form of air emissions from the boiler chimney activity, and generators, as well as the noise emanating from the operational turbines, generators, polishing drum rotation, nut creeker. The shape management by measuring the air quality and noise on a regular basis,. The results of the emission test parameter generator with NO₂, SO₂, CO, particulate, opacity, and flow rate in accordance with the quality standards established at Regulation Of Environmental Ministry No. 21 of 2008.

Domestic waste generated from housing, office, workshop and warehouse in the form of organic and inorganic garbage dumped into waste landfill is located away from employee housing and water resources. Based on field visit known that waste landfills form of dumping system.

Management POME done in WWTP before disposal land application accordance permit Ketapang regent number 862/KLH-B/2015 December 29 2015 and valid for 5 years. WWTP is equipped with aerobic and anaerobic Pond, so that does not exceed the quality standards. CH also has testing POME quality every month, accordance Minister Decree environmental agency number 28/2003.

5.3.2	Status: Comply	
5.4		
Efficiency of fossil fuel use and the use of renewable energy is optimised.		
5.4.1		
The Company already maximizing the use of renewable energy (fiber & shell) as boiler fuel. The company has monitored the use of fuel and the calculation of the energy produced. For example use of shells and fiber in January to June 2018 was 145,362 ton, which produces 3,634,025 kWh of electricity from turbine. Renewable energy use per ton of palm product in the mill is 13.50 kwh / ton CPO. Result Direct fossil fuel used is 0.13 kWh/ ton CPO.		
	Status: Comply	
5.5		
Use of fire for waste disposal and for preparing land for replanting is avoided except in specific situations, as identified in the ASEAN guidelines or other regional best practice.		
5.5.1 & 5.5.2		
The CH has procedure SOP No: BGAAGRKS-SOP-02, dated 3 June 2010, section 6.7 states that the company's commitment is to apply the "zero burning" method of Land Clearing plantations without burning. Based on field observations and document verification sighted that there is no replanting activities in PT GKG and PT GKS.		
	Status: Comply	
5.6		
Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.		

5.6.1

The company has identified the source of pollution and has assessed the pollution resulted from the company activity. The identified source of pollution in estate are manuring activity, clinic, workshop, spraying activity, office, warehouse and housing complex, generator use and transportation. Meanwhile, the source of pollution and waste identified in mill among others are processing activities, workshop, office, laboratory and WWTP. The regular quality test have been conducted for monitoring well for land application monitoring, soil in land application area, air emission, air ambient, water quality odor level, noise level and effluent quality. The water result shows that pH is under the regulated range which is too acid. The water has been in acid condition before entering the company area. The company evaluation informs that the acid water is due to the soil type of the area and the biological decomposition in the water body.

5.6.2

The Company periodically per 6 months has been testing the sources of emissions and pollutants, as indicated by the test results semester 1 year 2019 with test results that are below the threshold. Based on field interviews obtained information that CH has a fertilization work plan based on recommendations from recommendations. In addition, CH also has a wash facility for spraying equipment. Monitoring emission sources of pollution, including greenhouse gas emissions listed in SOP Greenhouse Gas Inventory no. BGA-SOP-CCS-1107 year 2012. The Company showed air quality testing and noise level May 5 2018, conducted by PT Mutu Agung Lestari (KAN No. LP-001-IDN) laboratory.

The company has listed the significant GHG emission both from mill and estate. The identified significant GHG emission source in Estate are land use change, the current land use type (manuring, soil cultivation, planting in peat land area), the use of fossil fuel for vehicle and heavy equipment and transporting FFB to mill. The identified significant GHG emission source in Mill are the use of generator fuelled with fossil fuel, the use of shell and fiber for boiler fuel, electricity use for mill operation, WWTP and transportation of CPO from mill to bulking.

The mitigation plan to reduce GHG emission develop by the company are routine engine maintenance such as ,boiler and generator, waste disposal management, riparian area reclamation, fertilizer application in accordance with dosage recommendation, SOP socialization on BMP practice and good WWTP operation, The plan has had clear timeline, PIC and target. The implemented ones are routine emission level test for air emission, noise, odor and air ambient, fertilizer applied as its recommendation and routine engine maintenance. The pollution and emission monitoring is conducted by the mill laboratory division and the measurement is conducted regularly refer to the applied regulation such as for noise and odor the measurement is conducted every 6 month and mill effluent quality is conducted every month. The measurement itself is conducted by the national accredited testing laboratory. The result of the monitoring shows that all the pollution and emission generated from company activity is still comply with each applied regulated threshold for each type of emission and pollution. Increased emissions due to replanting and fertilizer activities in 2018.

Based on field visit to mill's WWTP facility known that the mill effluent has been well treated, the supporting equipment is functioned well and the in-charged officer has understood his task well.

5.6.3

Base on document verification, CH has been done calculations emission with RSPO Palm GHG Calculator Version 3.0.1 with data input correctly. Calculation option applied CH is November 2005 cut off LUC.

Summary of Net GHG Emissions for assessment 2018 i.e.:

Emissions per product	tCO ₂ e/tProduct	Extraction	%	Production	ton/year
CPO	1.13	OER	22.85	FFB Processed	287445
PK	1.13	KER	4.08	CPO Produced	65684

Land Use	Ha
OP planted on mineral soil	23453.72
OP Planted on peat	2617.4
Conservation (forested)	330.55

Summary of Field Emissions and Sinks

	Own Crop		Group		3 rd Party	
	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e	tCO ₂ e/ha
Emissions						
Land conversion	24012.32	4.33	11923.55	5.11	12372.57	3.79
*CO ₂ emissions from fertilizer	5194.07	0.8	736.77	1.17	5146.04	1.57
N ₂ O emissions	11516.82	1.82	720.23	1.66	3826.85	1.17
Fuel consumption	1585.59	0.27	464.23	0.26	2692.38	0.82
Peat Oxidation	42578.1	8.17	98.89	5.73	0	0
Sinks						
Crop sequestration	-	-9.36	-20212.01	-9.36	-	-9.36
Conservation Sequestration	-180.33	-0.02	-3.49	-0.2	0	0
Total	32773.92	6.07	-6271.83	4.37	4226.33	-2.01

Summary of Mill Emissions and Credits

	tCO ₂ e	tCO ₂ e/tFFB
Emissions		
POME	56344.09	0.2
Fuel Consumption	773.53	0
Grid Electricity Utilisation	0	0
Credits		
Export of Grid Electricity	-6.47	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	57111.15	0.2

Palm oil Mill Effluent (POME) Treatment

Divert to compost	0
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

Emissions from Palm Kernel Crusher

Emissions Source	tCO ₂ e
PK from own mill	13303.94
PK from other sources	0
Fuel consumption	0
Total crusher emissions	0

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

Social impact assessment was conducted by IPB in 2012 involving local communities and smallholders. SIA has covered study of tenure issues, community demographics, socio-economic conditions of the community, employment, and general conditions of the community. The assessment has involved internal and external stakeholders through FGD method. Based on interview with representative of Mekar Utama Village, Kendawangan Kiri Village, Seriam Village, it is known that they have participated in social impact assessment. Besides, representative of PT GKG – GKS for communication and consultation with stakeholder also actively involving stakeholders in identified the existing social issues and CSR needs.

6.1.3 & 6.1.4

Management plan has been set in SIA document based on the social issues identified when the assessment. Then, CH has implemented the management plan and documented it in CSR report, such as free medical treatment in Banjarsari and Mekar Utama Village, repairing electrical machine “DongFeng” in Banjarsari and Mekar Utama Village, and others. CH also review the management plan every 2 year (period 2017 – 2019), the latest review was conducted on October 2017. The review also involving external stakeholder by public consultation and questionnaire distribution. Result of public consultation will be listed in Evaluation of Social impact monitoring Report. There is no changes in social management plan. Issue that has been identified in Evaluation of Social impact monitoring report will be input in management plan, such as resolve tenure issues around the company, smallholder realization, etc.

6.1.5

Social impact assessment has involved smallholders which is part of the surrounding village. Smallholders become the company's main partner in supplying FFB. UM has the results of a review of the SIA re-assessment on 14-20 December 2018 in collaboration with the Palm Oil Community Circle (LINKS).

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

CH has Communication Procedure (BGA-SUST-SOP-08) which explain the communication mechanism to stakeholder in order to implement the corporate transparency. The procedure is available in Bahasa Indonesia.

Based on interviews with representatives of Banjar Sari Village and Kendawangan Kiri Village, it is known that stakeholders know the procedures for communicating with the company and with whom to communicate. Communication can be done orally or in writing.

6.2.2, 6.2.3

CH has the latest list of stakeholders (Update July 7 2018), consist of village officials, sub-district heads, head of police, related agencies, hospitals, health centers, and local contractors. The person in charge for communication and consultation with stakeholders is corporate affair officer. Based on letter of assignment No 006/AC-6A/SK/IX/2018, corporate affair Corporate affair has the duty to foster and maintain communication with stakeholders, accommodate aspirations and provide a forum for complaints and input from stakeholders.

All communication from stakeholders in form of request for assistance village activity, has documented in recapitulation of incoming letter. The incoming letter, such as on August 15 2019 about donation for Indonesia independence day, responded by company on August 15 2019 and give the donation.

Based on interview with representatives of Kendawangan Kiri Village and Banjar Sari Village, it is known that all proposal

will be responded by company.		
	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		
CH has a mechanism of complaint and grievance handling in Complaint Procedure No BGA-SUST-SOP-40. This procedure regulates the mechanism for submitting complaints from external and internal parties. PT GKG will protect the identity of the complainant. The person in charge for complaint handling is CSR and partnership department. Based on interview with worker in Kendawangan Mill, Kendawangan Estate, Mekar Utama Estate, and Banjar Sari Estate, it is known that workers understand how to deliver their complaint if any. Also, Based on interview with representative of Kendawangan Kiri and Banjar Sari Village, it is known that they understand the mechanism to deliver their complaint if any.		
6.3.2		
Documentation of complaints is listed in the Internal & External Complaints HRD Regional 4A. An example of complain: On October 23 2019 complaint from Sungai Tapah Estate worker about extrafooding for pesticide & fertilizer applicator and responded by CH October 28 2019 accordance the routine schedule for extrafooding / milk delivery and monitoring by the foreman of BSS & BSS. The complaint submitted to CH, has been documented on listed Internal & External Complaints HRD Regional 4A. Based on information from internet, there is issues about harvesting insentive payment on <i>iedul fitri</i> 2019 as follows: http://mediakalbarnews.com/2019/07/09/karyawan-pt-gkg-unit-sthe-divisi-empat-meminta-insentif-panen-di-bayarkan/ . The auditor team has verified it during audit activity, there are harvesting insentive payment in Sungai Tapah Estate at all division (1 to 5) for harvesting activities dated 8 to 13 June 2019. For example: there are 67 harveters.		
	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		
There is no change of the SOP of land compensation through the FPIC process stated in the Plant and Land Growing Compensation Procedures Number. SOP-PAD-001. The procedure describes the steps in the implementation of Compensation, among others: undertaking the inventory of land to be compensated, socializing to the land-owning community, negotiating of compensation, approving management, making payments, handover of land, and documentation.		
The results of the public consultation and assessment of HCV and SIA is known that there are no indigenous rights or customary rights. The individual rights within the area has been compensated in accordance with FPIC principles. There are no new land acquisitions since the last assessment, compensation process for all cultivated area are have been done in 2013 and has been verified in the previous assessment. Land acquisition documents indicated in the form of Payment Minutes of Land Acquisition, Statement Letter, Receipt of payment, Letter of Land Handover, Letter of Agreement of Land Tenure Rights, Location Map agreed to both parties and Land Management Statement Letter. The Documents and agreements shows that compensation process are done directed to the land owner.		
	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		
Certificate holder has implemented decree of Kalimantan Barat Governor number 590/DISNAKERTRANS/2018 about The minimum wage for Regency in Kalimantan Barat. The wage system for permanent workers also regulated on IOM n number 023/IOM-A/HC-BGA/XII/2018. Furthermore, the basic salary for worker is explain in appointment decree. CH also show an example of pay slip which explain the details of income (basic salary, premium pay) and deduction such as employment insurance payment and other deductions. Payment of overtime is regulated in Company Regulation article		

9. It is stated that provisions regarding overtime pay is guided by the applicable regulation. The pay and condition for no permanent workers is regulated in the work agreement. Based on interview with harvesters, it is known that there is no force labour. If they've got the target, they will get the premium pay. Based on interview with workers at field observations are also known that the workers get wages according to minimum wage. Therefore based on information from internet, there is issues about harvesting insentive payment on *iedul fitri* 2019 as follows: <http://mediakalbarnews.com/2019/07/09/karyawan-pt-gkg-unit-sthe-divisi-empat-meminta-insentif-panen-di-bayarkan/>.

The auditor team has verified it during audit activity, there are harvesting insentive payment in Sungai Tapah Estate at all division (1 to 5) for harvesting activities dated 8 to 13 June 2019. For example: there are 67 harveters.

The auditor team has been checked working hours for the harvester, the conclusion is the wage and working hour accordance with regulation.

6.5.2

Certificate holder has company regulation period of 2018 – 2020 that has been ratified by Manpower Agency of Ketapang Regency number KEP. 746/PHIJSK-PK/PP/VI/2018. It explain explains about company and workers duty and rights, such as wage system, assessment of worker performance, promotion, demotion, leave rights, etc. CH also has work agreement with worker in form of appointment decree for daily and monthly permanent worker.

NCR 2019.02

Evidence observed

- Contracts are available for permanent workers (*pegawai tetap harian*) October 15 2019 for Lose fruit collection worker, on agreement letter point 5 validity period 12 month October 23 2019 to October 23 2020.
- Based on field visits and interviews with Lose fruit collection worker Block K-17, division 2, BSRE known that started working since 15 October 2019 as permanent workers (*pegawai tetap harian*).
- Based on interview with management (CH), it was explained Lose fruit collection worker have a status permanent workers (*pegawai*), while the 12 month period (October 23, 2019 to October 23, 2020) is probation period.
- Regulation government number. 13 of 2003 concerning manpower article 60 paragraph 1 explains "Work agreements for permanent workers (*Perjanjian kerja untuk waktu tidak tertentu*) required for probation period is 3 months maximum.

Non-Conformance Description

Work agreements by employees of Lose fruit collection worker block K-17 division II BSRE are not accordance with Regulation government number. 13 of 2003 concerning manpower, for example:

- Not yet explained the kind of work.
- Not yet explained the rights and obligations of worker (Health assurance, labor assurance etc.).

6.5.3 & 6.5.4

Based on field observation, it is known that the company has been providing housing facilities, lighting, water, daycare, places of worship, school buses, clinics and educational facilities. The housing are adequate, Such as one house occupied by one family. Company also facilitates all workers to access adequate food supply by establishing worker cooperative. Moreover, there are some shops in housing complex. Personnel can get the staple food with reasonable price. The Company also provides rice support to all permanent worker.

Auditor verification 27 January 2020

The company shown evidence consist of :

- Minutes of inventory of permanent workers agreements (*pegawai tetap harian*) for PT GKG & PT GKS region 4 A on January 2020 explained :
 - Monitored of new permanent workers agreements (*pegawai tetap harian*).
 - The appointment for new permanent workers shall signature by HRD for agreements letter form standart.
- Minutes of workers agreements letter on 17 January 2020 for 4 workers.
- The permanent workers agreements (*pegawai tetap harian*) letter for name Boni on 15 October 2019 explained the kind of work is upkeep worker and rights and obligations of worker Health assurance, housing, PPE and labor assurance (BPJS TK, BPJS Kesehatan).

- The permanent workers agreements (*pegawai tetap harian*) letter for name Lucia Yenny Bunganna on 15 October 2019 explained the kind of work is upkeep worker and rights and obligations of worker Health assurance, housing, PPE and labor assurance (BPJS TK, BPJS Kesehatan).
- The permanent workers agreements (*pegawai tetap harian*) letter for name Risma Krismonia on 15 October 2019 explained the kind of work is upkeep worker and rights and obligations of worker Health assurance, housing, PPE and labor assurance (BPJS TK, BPJS Kesehatan).

Auditor conclusions, based on above explanations sighted that this nonconformities number 2019.04 has been closed.

6.5.2	Status: Non-conformity number 2019.04 with major category has been Comply	Closed
-------	---	--------

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.

Policy related to worker union is written on Internal Office Memo No 010/GKG-Dpt/VIII/2017 on 1st August 2017 signed by Deputy RH IV. It stated that the company giving freedom to all worker to establish and/or be a member of a worker union. The implementation of this policy is Worker Union for both of PT GKG which has been registered to Man Power Agency of Ketapang regency by

The implementation of this policy is Worker Union for both of PT GKG and GKS which has been registered to Man Power Agency of Ketapang regency:

- Decree of Head of Manpower Agency Number 73 10th October 2016 for Workers Union of PT GKS
- Decree of Head of Manpower Agency Number 72 10th April 2019 for Workers Union of PT GKG

The meeting of worker union is documented in form of list of attendees and minutes of meeting, such as agreement between Worker Union March 20 2019 which attended by 18 participants; record meeting and health & labor assurance, and minimum wage on March 20 2019 which attended by 23 Participant.

Based on interview with workers in Kendawangan Estate, Seriam Jaya Estate, Sungai Tapah Estate and Kendawangan Mill it is know that some of the workers know the freedom to be a member of worker union and there is no intervention from management to the election of workers union representative.

Status: Comply

6.7

Children are not employed or exploited.

Bumitama Agri Ltd has declared their commitment to respect for human rights in workplace (<https://www.bumitama-agri.com/page/layout/66/63/respect-for-human-rights-in-workplace>). Bumitama commits to:

- Respect worker's rights in accordance with local and national laws, regulations and practices (including the ILO requirements and the UDHR), both for permanent and temporary workers;
- **No child labour in our mills and plantations, no discrimination and no sexual harassment;**
- Providing employees with a wage equal or higher to the legal minimal wage in the Province, while being observant to any potential requirements of the Decent Living Wage based on the RSPO P&Cs or other international standards;
- Recognise and respect the right of all workers to form or become member of labour unions;
- Ethical recruitment;
- Securing of a healthy and safe working environment for all their employees, contractors and visitors;
- Implement Good Corporate Governance on all levels of the workforce and operations.

Area Controller 6A has signed the regional policy since 25 June 2018 that stated not employ children under the age of 18. Based on interview with related government agencies in Ketapang District, obtain information that there is no under age employee cases in PT GKG and PT GKS.

Based on document verification, there is no record of employee under 18. During the audit, auditor also verify the age of employee in estate, mill or contractor worker and obtain information that there is no under age employee.

To ensure that this policy has been properly socialized, the auditor team also conducted interviews with representatives

of the unions and workers concerned in the field. The signboard as a socialization form also in place.

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

Bumitama Agri Ltd has declared their commitment to respect for human rights in workplace (<https://www.bumitama-agri.com/page/layout/66/63/respect-for-human-rights-in-workplace>). Bumitama commits to:

- Respect worker's rights in accordance with local and national laws, regulations and practices (including the ILO requirements and the UDHR), both for permanent and temporary workers;
- **No child labour in our mills and plantations, no discrimination and no sexual harassment;**
- Providing employees with a wage equal or higher to the legal minimal wage in the Province, while being observant to any potential requirements of the Decent Living Wage based on the RSPO P&Cs or other international standards;
- **Recognise and respect the right of all workers to form or become member of labour unions;**
- Ethical recruitment;
- Securing of a healthy and safe working environment for all their employees, contractors and visitors;
- Implement Good Corporate Governance on all levels of the workforce and operations.

There is also had Workers Responsibility Policy is available which is signed by Area Controller 6A on June 25th 2018 which stated that the company will provide the same reward by not distinguishing race, religion, degree, ethnicity, gender, skin color, imperfection, sexual orientation, politic affiliation, organizational membership, and age. Based on public consultation with related government agencies and labor representatives (random from different gender, age, races, ethnic, religion and other) obtain information that there is no discrimination in workplace. All employee are equal and had a same chance in their carrier and other work assessment. There is no issues related to discrimination so far.

6.8.3

There is also had Workers Responsibility Policy is available which is signed by Area Controller 6A on June 25th 2018 which stated that the company will provide the same reward by not distinguishing race, religion, degree, ethnicity, gender, skin color, imperfection, sexual orientation, politic affiliation, organizational membership, and age. Based on public consultation with related government agencies and labor representatives (random from different gender, age, races, ethnic, religion and other) obtain information that there is no discrimination in workplace. All employee are equal and had a same chance in their carrier and other work assessment. There is no issues related to discrimination so far.

Auditor team as verify the implementation of this policy and found that there is an evidence of employee hiring without discrimination. Based on employee register as per September 2019 obtained information that the employee originated from the different gender, races, ethnic, religion etc. In addition, employee promotion documents are shown based on measurable and proven performance appraisal results. For example, promotion of harvester from Division 2 Sungai Tapah Estate to be upkeep supervisor as per 1 October 2019 based on estate manager's appraisal.

Status: Comply

6.9

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

6.9.1

Bumitama Agri Ltd has declared their commitment to respect for human rights in workplace (<https://www.bumitama-agri.com/page/layout/66/63/respect-for-human-rights-in-workplace>). Bumitama commits to:

- Respect worker's rights in accordance with local and national laws, regulations and practices (including the ILO requirements and the UDHR), both for permanent and temporary workers;
- **No child labour in our mills and plantations, no discrimination and no sexual harassment;**
- Providing employees with a wage equal or higher to the legal minimal wage in the Province, while being observant to any potential requirements of the Decent Living Wage based on the RSPO P&Cs or other international standards;
- **Recognise and respect the right of all workers to form or become member of labour unions;**
- Ethical recruitment;
- Securing of a healthy and safe working environment for all their employees, contractors and visitors;

- Implement Good Corporate Governance on all levels of the workforce and operations.

The company has had gender committee to cover the women (especially employee) issues. One of the function of gender committee is to gathering information regarding of women issues such as discrimination on women employee, harassment, reproductional health etc. During the audit, auditor has interviewed representative's board of gender committee and random women employee in upkeep activity obtain information that there is no discrimination or any harassment issues on women employee.

6.9.2

According to the previous indicator which is 6.9.1, the company also provide the policy to protect reproductional health of women (especially employee). There is a special leave for menstruation and pregnant women employee. Through the interview with random women employee and board of gender committee in each unit, obtain information that the company has socialized this special policy and implemented in fair and transparent. All women employee attended pregnancy regularly testing that conducted by the company to avoid pregnant women working in high-risk station (chemical handling or other work task). Pregnant employee should be transferred to low-risk station to minimize the risk for the fetus.

6.9.3

Bumitama's has had the policy regarding to any grievances and complaint https://www.bumitama-agri.com/asset/upload/storage/report/BAL_WB_Policy_English_ver.pdf. The policy stated:

Bumitama strives to amicably resolve conflicts and complaints with all parties in an open, transparent, and constructive manner through our complaints and whistle blowing procedures, in addition to the RSPO complaints mechanism. The corrective measures taken, where appropriate, will be publicly reported.

Our employees or any other persons such as customers, suppliers, contractors or local community may, in good faith and confidence, without fear of reprisals raise concerns about possible improprieties in financial reporting, unethical practices or other matters. Anonymous disclosures will also be accepted and anonymity honored. The whistle-blowing policy and the procedures put in place to implement such a policy, has been reviewed and approved by our Audit Committee. Whistle blowing can be initiated via text/call to mobile number +62 812 86419700 or email to audit.pengaduan@bumitama.com. Bumitama also provides a QRS hotline channel for employees to convey their HR-related concerns

Procedure for Grievance Submission

The goal of the grievance mechanism is to enable our stakeholders to approach us first with any questions, grievances or complaints prior to raising external complaints, e.g. with the RSPO.

Grievances can be submitted through any of the following channels:

- By email to: grievance_channel@bumitama-agri.com

- In writing to:

Bumitama Agri Ltd.

Jln Melawai Raya No.10

Jakarta Selatan 12160

Indonesia

Attention: Corporate Sustainability (Grievance Coordinator)

The grievance should include the following information:

- Full Name
- Name of Organization (if any)
- Address
- Phone No. / Fax No. / Email Address (at least one contact point)
- Description of the grievance in detail & supporting documents (evidences)

All grievances lodged will be recorded, investigated and handled in a fair and transparent manner. Anonymity of those using the grievance mechanism will be preserved.

Those policy above has been socialized both oral and written to the respective stakeholder (internal or external). According to the interview during stakeholder consultation with local communities or labor representatives obtained information that they had an access to report the unsatisfaction condition or any discrimination etc through the whistleblowing procedure above.

	Status: Comply	
6.10 Growers and mills deal fairly and transparently with smallholders and other local businesses.		
<p>6.10.1 FFB price determination by considering and referring to the calculation of FFB price by Plantation Agency of West Kalimantan Province for each month that issued by the Department of Plantations on the date of 10 -15 months. Based on the results of the public consultation with representatives of Supplier of FFB and smallholder members, there was never any issues related to the pricing of FFB. Companies with local communities as a FFB seller already has a work agreement, so that prices of FFB has been listed in SPK (work agreement) determined by the company. For example of invoice document submitted by CV IGVAM period 1 and 2 August 2018 is known that the price of FFB per kg is in accordance with the agreement.</p> <p>6.10.2 CH has a contract of work agreement between the factory and the farmers indicated by the Sale and Purchase Agreement Letter for local FFB. For example the letter of purchase agreement between the factory with the local FFB CV IGVAM by Number. 002/SPKL/KNDM-TBS//2018. In the letter explained about biodata both parties, the scope of the agreement, the quality requirements and acceptance FFB, pricing is based on statutes prices in Plantation Agency of West Kalimantan Province determined every month, for the period of 12 months, the mode of payment is paid 2 times a month and made by transferring to the account of contractors with a maximum of 10 days after the invoice submitted to the company, warranties and conditions of the agreement expires, until the settlement issue.</p> <p>6.10.3 CH has a contract agreement between the factory and the farmers indicated by Purchase Agreement Letter of local FFB. Both sides have understood the contract they held because the letter is signed by both parties. The contract agreement was made two copies so that each - each party save contract. Based on interview with contractor it is known that the contractor have been given time for freely decide to accept the contract or not. The contractor also has understood and agree with the contract.</p> <p>6.10.4 In Purchase Agreement of FFB Article 5 about how to pay mentions that the payment is calculated based on minute of hand over of FFB issued by First Party, Payment FFB carried out using a transfer to the bank account designated by the second party, second party shall issue invoice/billing payments of FFB to the first party as much as 2 periods/month, payment made by the first party via transfer to the account of the second party maximum of 10 working days from the date of invoice is received by the first or the day after if the payment to coincide with national holidays or holiday bank operations. Based on the results of public consultations with CV IGVAM representatives and members of plasma cooperatives, there was never an issue related to determining FFB prices. The company with the community as the seller of FFB already has a work agreement, so that the price of FFB has been listed in the SPK determined by the company by considering and referring to the calculation of FFB prices by the West Kalimantan Provincial Plantation Office for each current month issued by the Plantation Office on the 10th - 15 months running. Regarding the payment of FFB coordinated by the Partnership Section (Mr. Budi) in coordination with the commercial section The company shows proof of payment as follows</p> <ul style="list-style-type: none"> • Addendum of Local TBS Purchase Agreement No. 002 / SPKL / KNDM-TBS / I / 2019 dated January 1, 2018 with CV IGVAM, in article 5 paragraph 2 it is explained that payment via bank transfer with a maximum of 25 working days. • Based on the results of interviews with the IGVAM CV contractor when ASA-4 explained that so far the average payment is 15 days after BAPP. 		
	Status: Comply	
6.11 Growers and millers contribute to local sustainable development wherever appropriate.		
<p>6.11.1 Based on interview with representative of Mekar Utama, Kendawangan Kiri, Seriam Village, it is known that CH will responded and give the assistance to village based on the proposal. Besides, CH also give contribution to surrounding</p>		

village in several aspects, such as infrastructure, religion, culture aspects, etc. For example: CH give donation for activity of *Dewan Adat Dayak* in Ketapang Regency. Company also employ villagers.

6.11.2

The company has contributed to increasing the productivity of smallholder farmers, for example:

The company has a record of socialization with all representatives of plasma cooperatives related to the commitment to follow the regulations according to the standards of sustainable palm oil management, also known by the Head of Kendawangan.

Status: Comply

6.12

No forms of forced or trafficked labour are used.

6.12.1; 6.12.2; 6.12.3

Based on document review, field observation, and interviews with worker and stakeholders, it is known that there is no migrant labor, including forced labor and illegal labor. The recruitment is done according to the company's procedure. All workers have work agreement or assignment letter that explain about the obligation and rights of the worker, and other provision. They work based on the contract and work order. Based on field observation and interviews with the workers in Estate and Mill, it is known that there is no discrimination among them. All workers is come from various ethnic groups and religions. Moreover based on interview with the harvester and workers union, there were no complaint about working hours. The payment is based on tonnage. If they did not get the tonnage after working hours is out, they will be paid by daily payment. Therefore based on information from internet, there is issues about harvesting insentive payment on *iedul fitri* 2019 as follows: <http://mediakalbarnews.com/2019/07/09/karyawan-pt-gkg-unit-sthe-divisi-empat-meminta-insentif-panen-di-bayarkan/>. The auditor team has verified it during audit activity, there are harvesting insentive payment in Sungai Tapah Estate at all division (1 to 5) for harvesting activities dated 8 to 13 June 2019. For example: there are 67 harveters.

Status: Comply

6.13

Growers and millers respect human rights

6.13.1

The CH has policy on human rights listed on Internal Office Memo no 010/GKG-Dpt/VIII/2017 on August, 1st 2017. The policy explains the protection of children and female workers, equal opportunities in employment opportunities, and freedom of association and assembly. Based on interview with several workers and local contractor sighted that the policy has been socialized by the company.

Status: Comply

PRINCIPLE #7 Responsible development of new plantings
7.1

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

7.1.1; 7.1.2 & 7.1.3

The results of interviews, document verification and field visits, there are no activities to develop / expand and new planting.

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 and 7.2.2

The company already has a map that informs condition of the land in PT GKG and PT GKS that explain marginal land and its distribution. For example on MUTE there is a deep sand area of 589.67 Ha; spodic sand 69.70; kaolin 751.70 Ha; Lateritic 1,434.31; slope > 8% 142.02 Ha and no tidal area found. The marginal area map has provided information on soil type, topography, hydrology, and fertility. Conditions on the type of soil in the area of operation can also be seen in the Environmental Management and Monitoring documents made in 2010. The map can be used as a preliminary information for companies in determining management strategies. Based on basic information data total area set aside for conservation area of 39 Ha for PT GKS and 37 Ha for PT GKG.

In the peat and lowland areas, irrigation and drainage systems have been created. The company shows a map of peat distribution for MUTE, STHE, and BSRE. Management of peat areas includes maintaining water levels and observing peat surface degradation

The Company already has a land slope map and a marginal area distribution that can be used as information in drainage, irrigation and road infrastructure development. Marginal land maps have been described in indicator 4.3.1. The map informs an area with a slope of more than 8% as well as a peatland distribution. Information about the slope of the land is also contained in the DPPL document.

Status: Comply

7.3

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

7.3.1, 7.3.2, 7.3.3, 7.3.4 & 7.3.5

The company has conducted HCV identification on 2012. The identification is conducted after the land clearing and during the ongoing land clearing at that time. The first new planting was conducted on 2007. However the company has conducted ongoing NPP in 2014 and developed HCV management plan. The NPP has been published in RSPO website on 30 December 2014.

CH shown LUCA approval October 10, 2016, before CH had submitted first concept note July 16, 2015. The approval concept note by RSPO November 25, 2016, almost one and half year later. February 7, 2017 CH submitted again compensation plan to RPSO.

NCR 2019.05

Based on the RACP document endorsement in form of LUC analysis verification the result for PT GKG liability area is 883.51 ha multiplied by 0.7 so the conservation liability area is 618.46 ha and PT GKS liability is 532.30 ha multiplied by 0.7 so the conservation liability (liability compensation) is 372.61 ha.

Bumitama Agri Ltd has submitted Liability Disclosure and LUCA for PT GKG & PT GKS to RSPO Compensation Plan January 29 2018 and declared **PASS**. However, until the ASA-4 audit, there was no evidence the RAC-Plan for PT GKG & PT GKS had been approved by the RSPO. **NCR number 2019.05.**

Auditor verification November 19 2019

There email dated 11/14/2019 11:30 from Khing Su Li khing.suli@rspo.org stating the RAC-Plan of PT. GKG and GKS are still on review.

There is RSPO response dated 23/09/2019 15:20 aimy.nadiyah@rspo.org regarding RAC-Plan Bumitama Agri Ltd status, which states the company can continue the certification process with NC major status 7.3.1 **still open until the next surveillance audit.**

7.3.1	Status: Non-conformity number 2019.11 with Major category still open until next surveillance audit.	Open
--------------	--	-------------

7.4

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

7.4.1 and 7.4.2

The Company has fragile and marginal land maps including slopes and peatlands. Documents that identify such things as DPPL, Peatland distribution and depth, and marginal land maps. Based on the document is known in the MUTE region there are 142.02 Ha with Slope > 8%, while on STHE and BSRE into the flat area. The peatland map states the identified areas of 93.3 Ha Haplohemist on BSRE, 593.15 Ha at STHE, and 267.23 at MUTE. The other marginal area consists of kaolin and low land.

The management strategy to plant on the slopy area (based on climate and soil condition) is based on the SOP of high-erosion potential area management (Document No. BGA-SOP-CCS-113 year 2012). There are soil types that required appropriate practice according to the maps for example sandy soil and kaolin soil the strategic applied is to use empty fruit bunch application and for peat soil the strategic applied is to use boiler ash. The plan for planting on peat by the

management unit was consider for not to plant especially over the 3 meters peat deep.		
	Status: Comply	
7.5 No new plantings are established on local peoples' land without their free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.		
7.5.1 Based on documents review, interview and field visits, it is known that CH did not expand the operational area and there is no more land clearing activity since the last assessment (2017). The land clearing process has been verified by NPP on 16 December 2014.		
	Status: Comply	
7.6 Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their free, prior and informed consent and negotiated agreements.		
7.6.1; 7.6.2; 7.6.3; 7.6.4; 7.6.5; 7.6.6 Based on documents review, interview and field visits, it is known that CH did not expand the operational area and there is no more land clearing activity since the last assessment (2017). The land clearing process has been verified by NPP on 16 December 2014.		
	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 has a policy of "land clearing without burning" as stated in SOP No: BGAAGRKS-SOP-02, dated June 3, 2010, section 6.7 states the company's commitment to apply the "zero burning" method in Land Clearing. The results of the field visit showed there were no signs of land clearing by burning in the operational area.		
	Status: Comply	
7.8 New plantation developments are designed to minimise net greenhouse gas emissions.		
7.8.1 & 7.8.2 The company has identified potential significant emission source generated from company operational area as well as the GHG calculation. It is covered in summary report of GHG management and mitigation plan of PT GKG and PT GKS year 2018. The GHG calculation is calculated using Palm GHG Calculator version 3.0.1 and has been submitted to RSPO. Company has conducted RSPO New Planting Procedure (NPP) assessment on 2014. The company has finished its planting activity in 2013 and no new expansion for new planting, therefore the company has no obligation to calculate its high carbon stock assessment.		
	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 been implementing commitment to continual improvement, such as: Environmental aspects <ul style="list-style-type: none"> • Effluent management and monitoring. WWTP pond management, effluent quality test and report it to Ketapang District Environment Agency. • Air quality management and monitoring. Road maintenance, air quality test and report it to Ketapang District Environment Agency. 		

- Ground water management and monitoring. Testing ground water quality and report it to Ketapang District Environment Agency.
- Hazardous waste management. Storing hazardous waste at the permitted hazardous waste, managing and monitoring hazardous waste (conducted by Ketapang District Environment Agency).

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 organization take legal ownership and physically handles RSPO certified sustainable oil palm products. CPO and PK transporter are under contract with PT. Gunajaya Karya Gemilang. The CPO and PK transporter contractor are:</p> <ul style="list-style-type: none"> - CPO: CV Kawira Putra - PK: PT. Suri Adidaya Kapuas
	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>CH does not buy from any RSPO licensed traders</p>
	Status: Comply
5.1.3	<p>Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform.</p> <p>The parent company are member of RSPO (Bumitama Agri Ltd):</p> <ul style="list-style-type: none"> - Number of RSPO membership: 1-0043-07-000-00 - RSPO IT Platform for Kendawangan Mill: RSPO_ PO1000003491
	Status: Comply
5.1.4	<p>Processing aids do not need to be included within an organization's scope of certification.</p> <p>Parent company or site has no processing aids</p>
	Status: Comply
5.2	Supply chain model
5.2.1	<p>The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.</p> <p>The organization has applied mass balance supply chain model correctly and there is no declassification.</p>
	Status: Comply
5.2.2	<p>The site can use one (1) or a combination of supply chain models as audited and certified by the CB.</p> <p>The organization has applied mass balance supply chain model only</p>

	Status: Comply
5.3	Documented procedures
5.3.1	<p>The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified.</p> <p>The Certificate Holder has the procedure of Product Identification & Supply Chain (BGA-SUST-SOP-22 dated 12 May 2018). The procedures established and covering all elements of the supply chain model requirements, records and reports of compliance with supply chain requirements including training records. The procedures also identified role of implementation responsibility persons that trained. Based on interviews with mill clerk note that the clerk understand the separation between FFB certified and noncertified. He also record the FFB received from all supply bases.</p>
	Status: Comply
5.3.2	<p>The site shall have a written procedure to conduct annual internal audit</p> <p>The Procedure to conduct annual internal audit are describe at procedure of internal audit (BGA-SUST-SOP-50 dated 12 May 2018). Internal audit are conforms to the requirements in the RSPO SCCS and the RSPO market communications and claims documents and effectively implements and maintains the standard requirements. The last internal audit are conduct at 15 August 2018.</p>
	Status: Comply
5.4	Purchasing and goods in
5.4.1	<p>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</p> <p>The certificate holder has not purchased CSPO or CSPK.</p>
	Status: Comply
5.4.2	<p>The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents</p> <p>CH has implemented SCCS in Mass balance model, where there is no contaminations of RSPO certified materials during receiving, processing, storage and dispatch. Non conforming product describe in differences of projection and actual of quantity and quality product.</p>
	Status: Comply
5.5	Outsourcing activities
5.5.1	<p>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.</p> <p>CH are outsourced the CPO and PK transporting to independent third parties and has checked all CPO and PK at the deliveries to ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. The CPO and PK transporter as follows:</p> <ul style="list-style-type: none"> - CV Kawira Putra (CPO transporter), for example: Number 516/LO/CD-HO/X/19 dated 9 October 2019 from KNDM to the Banjarsari Jetty with quantity: 2,800 MT. - PT. Suri Adidaya Kapuas (PK transporter), for example: Number 587/LO/CD-HO/X/19 dated 14 October 2019 from KNDM to the Kendawangan Jetty with quantity: 400 MT.
	Status: Comply

5.5.2

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

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

CH has an agreement or contract covering the outsourced process which describe control system of contractor activities by certificate holder and to ensure that certification bodies have access to the outsourcing contractor or operation if an audit is deemed necessary.

- CPO: CV Kawira Putra (516/LO/CD-HO/X/19 dated 9 October 2019)
- PK: PT. Suri Adidaya Kapuas (587/LO/CD-HO/X/19 dated 14 October 2019)

Both of above agreements has described that the contractors willing to access by the RSPO certification bodies.

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.

CH has record the name and contract details of contractor used for handling of RSPO certified oil palm products:

- CPO Transporter: CV Kawira Putra, address: Sub district Delta Pawan, District of Ketapang.
- PK Transporter: PT. Suri Adidaya Kapuas, address: Sub district Kendawangan, District of Ketapang.

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

Since the General chain of custody requirements for the supply chain is applied in 2018, the CH has contractors for CPO Transporter contractor (CV. Kawira Putra) and for PK Transporter contractor (PT. Suri Adidaya Kapuas). There is no new contractor used for the processing or physical handling of RSPO certified oil palm products.

Status: Comply

5.6
Sales and goods out
5.6.1

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

The site has no certified products selling In periods of license 3 december 2017 – 2 December 2018. The products information can be found at palm trace shipping announcement, the informations are:

- The name and address of the buyer;
- The name and address of the seller;
- The loading or shipment / delivery date;
- A description of the product RSPO certified Mass Balance model
- The date on which the documents were issued;
- The quantity of the products delivered;
- Any related transport documentation;
- etc.

Status: Comply

5.7	Registration of transactions																																																																																													
5.7.1 Supply chain actors who: <ul style="list-style-type: none"> are mills, traders, crushers and refineries; and take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable 																																																																																														
CH as mill has registered all transactions in RSPO IT platform. The parent company are member of RSPO (Bumitama Agri Ltd): <ul style="list-style-type: none"> Number of RSPO membership: 1-0043-07-000-00 RSPO IT Platform for Kendawangan Mill: RSPO_PO1000003491 																																																																																														
	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. 																																																																																														
Transactions are registered in RSPO IT platform as for periods of license (18 December 2018 to 2 December 2019): <ul style="list-style-type: none"> CSPO sold to each buyer (Claim) <table border="1"> <thead> <tr> <th>Transaction ID</th> <th>Transaction Date</th> <th>Product</th> <th>Volume (MT)</th> <th>Buyer</th> <th>Transaction Type</th> </tr> </thead> <tbody> <tr> <td>TR-05d0c388-46ff</td> <td>19-08-2019</td> <td>CSPO</td> <td>1,743.71</td> <td>PT Asianagro Agungjaya</td> <td>Shipping</td> </tr> <tr> <td>TR-1a216f9eb217</td> <td>19-08-2019</td> <td>CSPO</td> <td>750.00</td> <td>PT Asianagro Agungjaya</td> <td>Shipping</td> </tr> <tr> <td>TRc1b51ae9-303d</td> <td>18-08-2019</td> <td>CSPO</td> <td>1,550.00</td> <td>PT Asianagro Agungjaya</td> <td>Shipping</td> </tr> <tr> <td>TR-7f5fc50aae3c</td> <td>14-05-2019</td> <td>CSPO</td> <td>2,000.00</td> <td>PT Asianagro Agungjaya</td> <td>Shipping</td> </tr> <tr> <td>TR-7f5fc50aae3c</td> <td>25-04-2018</td> <td>CSPO</td> <td>1,607.00</td> <td>PT Asianagro Agungjaya</td> <td>Shipping</td> </tr> <tr> <td>TR-947cc7f8-7530</td> <td>25-04-2018</td> <td>CSPO</td> <td>1,693.00</td> <td>PT Asianagro Agungjaya</td> <td>Shipping</td> </tr> <tr> <td colspan="3">Total</td> <td>9,343.71</td> <td></td> <td></td> </tr> </tbody> </table> <ul style="list-style-type: none"> Credit Allocation of CSPO <table border="1"> <thead> <tr> <th>Transaction ID</th> <th>Transaction Date</th> <th>Product</th> <th>Volume (MT)</th> <th>Buyer</th> <th>Transaction Type</th> </tr> </thead> <tbody> <tr> <td>ST-TR-dedc3891-69a2</td> <td>11-02-2019</td> <td>CSPO</td> <td>5,000.00</td> <td>-</td> <td>Credit Allocation</td> </tr> <tr> <td>ST-TR-d0705674-896d</td> <td>12-03-2019</td> <td>CSPO</td> <td>3,000.00</td> <td>-</td> <td>Credit Allocation</td> </tr> <tr> <td>ST-TR-9b24341e-45d6</td> <td>04-07-2019</td> <td>CSPO</td> <td>2,000.00</td> <td>-</td> <td>Credit Allocation</td> </tr> <tr> <td>ST-TR-35f4608e-6ef4</td> <td>03-10-2019</td> <td>CSPO</td> <td>8,000.00</td> <td>-</td> <td>Credit Allocation</td> </tr> <tr> <td colspan="3">Total</td> <td>18,000.00</td> <td></td> <td></td> </tr> </tbody> </table> <ul style="list-style-type: none"> Certified Palm Kernel sold to each buyer <table border="1"> <thead> <tr> <th>Date</th> <th>Buyer</th> <th>Volume (Ton)</th> </tr> </thead> <tbody> <tr> <td>No CSPK Selling</td> <td>-</td> <td>-</td> </tr> <tr> <td colspan="2">Total</td> <td>-</td> </tr> </tbody> </table> <ul style="list-style-type: none"> Removal of CSPK 		Transaction ID	Transaction Date	Product	Volume (MT)	Buyer	Transaction Type	TR-05d0c388-46ff	19-08-2019	CSPO	1,743.71	PT Asianagro Agungjaya	Shipping	TR-1a216f9eb217	19-08-2019	CSPO	750.00	PT Asianagro Agungjaya	Shipping	TRc1b51ae9-303d	18-08-2019	CSPO	1,550.00	PT Asianagro Agungjaya	Shipping	TR-7f5fc50aae3c	14-05-2019	CSPO	2,000.00	PT Asianagro Agungjaya	Shipping	TR-7f5fc50aae3c	25-04-2018	CSPO	1,607.00	PT Asianagro Agungjaya	Shipping	TR-947cc7f8-7530	25-04-2018	CSPO	1,693.00	PT Asianagro Agungjaya	Shipping	Total			9,343.71			Transaction ID	Transaction Date	Product	Volume (MT)	Buyer	Transaction Type	ST-TR-dedc3891-69a2	11-02-2019	CSPO	5,000.00	-	Credit Allocation	ST-TR-d0705674-896d	12-03-2019	CSPO	3,000.00	-	Credit Allocation	ST-TR-9b24341e-45d6	04-07-2019	CSPO	2,000.00	-	Credit Allocation	ST-TR-35f4608e-6ef4	03-10-2019	CSPO	8,000.00	-	Credit Allocation	Total			18,000.00			Date	Buyer	Volume (Ton)	No CSPK Selling	-	-	Total		-
Transaction ID	Transaction Date	Product	Volume (MT)	Buyer	Transaction Type																																																																																									
TR-05d0c388-46ff	19-08-2019	CSPO	1,743.71	PT Asianagro Agungjaya	Shipping																																																																																									
TR-1a216f9eb217	19-08-2019	CSPO	750.00	PT Asianagro Agungjaya	Shipping																																																																																									
TRc1b51ae9-303d	18-08-2019	CSPO	1,550.00	PT Asianagro Agungjaya	Shipping																																																																																									
TR-7f5fc50aae3c	14-05-2019	CSPO	2,000.00	PT Asianagro Agungjaya	Shipping																																																																																									
TR-7f5fc50aae3c	25-04-2018	CSPO	1,607.00	PT Asianagro Agungjaya	Shipping																																																																																									
TR-947cc7f8-7530	25-04-2018	CSPO	1,693.00	PT Asianagro Agungjaya	Shipping																																																																																									
Total			9,343.71																																																																																											
Transaction ID	Transaction Date	Product	Volume (MT)	Buyer	Transaction Type																																																																																									
ST-TR-dedc3891-69a2	11-02-2019	CSPO	5,000.00	-	Credit Allocation																																																																																									
ST-TR-d0705674-896d	12-03-2019	CSPO	3,000.00	-	Credit Allocation																																																																																									
ST-TR-9b24341e-45d6	04-07-2019	CSPO	2,000.00	-	Credit Allocation																																																																																									
ST-TR-35f4608e-6ef4	03-10-2019	CSPO	8,000.00	-	Credit Allocation																																																																																									
Total			18,000.00																																																																																											
Date	Buyer	Volume (Ton)																																																																																												
No CSPK Selling	-	-																																																																																												
Total		-																																																																																												

The CH has remove volume of CSPK with volume 5,211 MT dated 7 November 2019.								
	Status: Comply							
5.8	Training							
5.8.1								
The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff								
CH has established and conducted RSPO Supply Chain Standards requirements training annually.								
	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								
Certificate holder has provided training at 1 July 2019 and Based on interview at weighbridge station is known that the weighbridge operator and SCCS PIC have understand the RSPO supply chain procedures.								
	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								
CH has maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements. Those are describe in this ASA report on section of Module E CPO Mills - Mass Balance Requirements.								
	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								
The retention times for all records and reports are keep in minimum 5 years. This matter according to procedure of Product Identification & Supply Chain (BGA-SUST-SOP-22 dated 12 May 2018). Based on document verifications it's known that the SCCS documents are availble since their applicated the RSPO SCCS.								
For Example:								
Weighbridge ticket of CPO Number C006637 dated 13 September 2017 with Quantity: 7,630 Kg, transporter by CV Kawira Putra to PT SMART, Tbk and vehicle number: KB 9372 GA.								
	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.								
Record of all certified palm oil / palm kernel oil volumes purchased (input) and claimed (output) for period of 1 November 2018 to 31 October 2019:								
Period	FFB Received		CSPO			PK		
	Certified	Total FFB	Certified Production	Sold as RSPO	Sold as Conventional	Certified Production	Sold as RSPO	Sold as Conventional
Nov 2018 to Oct 2019	161,525	139,861	36,794	9,434.71	18,000	7,084	-	5,211

	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	
The site doesn't applied a conversion rate.	
	Status: Comply
5.10.2 Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	
The site doesn't applied a conversion rate.	
	Status: Comply
5.11	Claims
5.11.1 The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.	
The site make claims regarding the sell of RSPO certified oil palm products only.	
	Status: Comply
5.12	Complaints
5.12.1 The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	
Procedures for stakeholders complaints established in form of procedure of complaints (BGA-SUST-SOP-40 dated 12 May 2018), The responsible officers are corporate affair, estate controller, mill controller, head of CSR and certification & compliance department. The complaints are collected and resolved then recorded and maintain on complaints document.	
	Status: Comply
5.13	Management review
5.13.1 The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken	
The certificate holder has management review conduct annually, for example at 18 October 2019.	
	Status: Comply
5.13.2 The input to management review shall include information on: <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard. • Customer feedback. • Status of preventive and corrective actions. • Follow-up actions from management reviews. • Changes that could affect the management system. • Recommendations for improvement. 	

The Management review are include result of internal audit, preventive and corrective actions, follow up actions and recommendations for improvement.	
	Status: Comply
5.13.3 The output from the management review shall include any decisions and actions related to: <ul style="list-style-type: none"> • Improvement of the effectiveness of the management system and its processes. • Resource needs. 	
The Management review are include the decision and actions related to Improvement of the effectiveness of the management system and its processes and Resource needs.	
	Status: Comply

3.2.2 (Module E) CPO Mills - Mass Balance Requirements

Clause	Requirement																																										
E.1	Definition																																										
E.1.1																																											
Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and sales volume of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.																																											
Kendawangan POM is used RSPO supply chain of Mass Balance module because the FFB are received from certified sources and non certified sources.																																											
	Status: Comply																																										
E.2	Explanation																																										
E.2.1																																											
The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the CB in the public summary of the P&C certification report. For an independent mill, the estimated tonnage of CPO and PK products must be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.																																											
Information related to projected certified products that may be produced by KNDM are listed in the ASA-3 certificate, actual production has been verified during the ASA-4 audit including product projection for the next 12 years (next licensing period), in the following table:																																											
	<table><tr><th></th><th>Last Year Projected Certified Volume (MT)</th><th>Last Year Actual Certified Volume (MT)</th><th>Next license projection (3 December 2019 till 2 December 2020)</th></tr><tr><td>FFB (tonnes)</td><td>231,000</td><td>161,525</td><td>249,024</td></tr><tr><td>CSPO (tonnes)</td><td>53,700</td><td>36,794</td><td>57,275</td></tr><tr><td>CSPK (tonnes)</td><td>9,700</td><td>7,084</td><td>11,206</td></tr></table>		Last Year Projected Certified Volume (MT)	Last Year Actual Certified Volume (MT)	Next license projection (3 December 2019 till 2 December 2020)	FFB (tonnes)	231,000	161,525	249,024	CSPO (tonnes)	53,700	36,794	57,275	CSPK (tonnes)	9,700	7,084	11,206																										
	Last Year Projected Certified Volume (MT)	Last Year Actual Certified Volume (MT)	Next license projection (3 December 2019 till 2 December 2020)																																								
FFB (tonnes)	231,000	161,525	249,024																																								
CSPO (tonnes)	53,700	36,794	57,275																																								
CSPK (tonnes)	9,700	7,084	11,206																																								
	Status: Comply																																										
E.2.2																																											
The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform).																																											
Kendawangan POM has met the requirements for reporting of RSPO supply chain through IT Platform:																																											
<ul style="list-style-type: none">RSPO IT Platform member registration number: RSPO_PO1000003491CSPO sold to each buyer (Claim)																																											
	<table><tr><th>Transaction ID</th><th>Transaction Date</th><th>Product</th><th>Volume (MT)</th><th>Buyer</th><th>Transaction Type</th></tr><tr><td>TR-05d0c388-46ff</td><td>19-08-2019</td><td>CSPO</td><td>1,743.71</td><td>PT Asianagro Agungjaya</td><td>Shipping</td></tr><tr><td>TR-1a216f9eb217</td><td>19-08-2019</td><td>CSPO</td><td>750.00</td><td>PT Asianagro Agungjaya</td><td>Shipping</td></tr><tr><td>TRc1b51ae9-303d</td><td>18-08-2019</td><td>CSPO</td><td>1,550.00</td><td>PT Asianagro Agungjaya</td><td>Shipping</td></tr><tr><td>TR-7f5fc50aae3c</td><td>14-05-2019</td><td>CSPO</td><td>2,000.00</td><td>PT Asianagro Agungjaya</td><td>Shipping</td></tr><tr><td>TR-7f5fc50aae3c</td><td>25-04-2018</td><td>CSPO</td><td>1,607.00</td><td>PT Asianagro Agungjaya</td><td>Shipping</td></tr><tr><td>TR-947cc7f8-7530</td><td>25-04-2018</td><td>CSPO</td><td>1,693.00</td><td>PT Asianagro Agungjaya</td><td>Shipping</td></tr></table>	Transaction ID	Transaction Date	Product	Volume (MT)	Buyer	Transaction Type	TR-05d0c388-46ff	19-08-2019	CSPO	1,743.71	PT Asianagro Agungjaya	Shipping	TR-1a216f9eb217	19-08-2019	CSPO	750.00	PT Asianagro Agungjaya	Shipping	TRc1b51ae9-303d	18-08-2019	CSPO	1,550.00	PT Asianagro Agungjaya	Shipping	TR-7f5fc50aae3c	14-05-2019	CSPO	2,000.00	PT Asianagro Agungjaya	Shipping	TR-7f5fc50aae3c	25-04-2018	CSPO	1,607.00	PT Asianagro Agungjaya	Shipping	TR-947cc7f8-7530	25-04-2018	CSPO	1,693.00	PT Asianagro Agungjaya	Shipping
Transaction ID	Transaction Date	Product	Volume (MT)	Buyer	Transaction Type																																						
TR-05d0c388-46ff	19-08-2019	CSPO	1,743.71	PT Asianagro Agungjaya	Shipping																																						
TR-1a216f9eb217	19-08-2019	CSPO	750.00	PT Asianagro Agungjaya	Shipping																																						
TRc1b51ae9-303d	18-08-2019	CSPO	1,550.00	PT Asianagro Agungjaya	Shipping																																						
TR-7f5fc50aae3c	14-05-2019	CSPO	2,000.00	PT Asianagro Agungjaya	Shipping																																						
TR-7f5fc50aae3c	25-04-2018	CSPO	1,607.00	PT Asianagro Agungjaya	Shipping																																						
TR-947cc7f8-7530	25-04-2018	CSPO	1,693.00	PT Asianagro Agungjaya	Shipping																																						

Total	9,343.71
-------	----------

- **Credit Allocation of CSPO**

Transaction ID	Transaction Date	Product	Volume (MT)	Buyer	Transaction Type
ST-TR-dedc3891-69a2	11-02-2019	CSPO	5,000.00	-	Credit Allocation
ST-TR-d0705674-896d	12-03-2019	CSPO	3,000.00	-	Credit Allocation
ST-TR-9b24341e-45d6	04-07-2019	CSPO	2,000.00	-	Credit Allocation
ST-TR-35f4608e-6ef4	03-10-2019	CSPO	8,000.00	-	Credit Allocation
Total			18,000.00		

- **Certified Palm Kernel sold to each buyer**

Date	Buyer	Volume (Ton)
No CSPK Selling	-	-
Total		-

- **Removal of CSPK**

The CH has remove volume of CSPK with volume 5,211 MT dated 7 November 2019.

	Status: Comply
--	-----------------------

E.3	Documented procedures
------------	------------------------------

E.3.1
The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:

- a. Complete and up to date procedures covering the implementation of all the elements in these requirements;
- b. The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site procedures for the implementation of this standard.

The Certificate Holder has the procedure of Product Identification & Supply Chain (BGA-SUST-SOP-22 dated 12 May 2018). In SOP has explained the duties and responsibilities of each SCCS implementation. Based on the interview with the weighbridge officer, it was explained that deliveries notes originating from certified areas are given RSPO stamp marks and documentation has been separated between certified and non-certified Delivery Notes. For sales of certificate products, weigh tickets will be given RSPO certified marks in accordance with information from the Commercial & Logistic Group Department based on contract with the buyer.

	Status: Comply
--	-----------------------

E.3.2
The site shall have documented procedures for receiving and processing certified and non-certified FFBs

The Certificate Holder has the procedure of Product Identification & Supply Chain (BGA-SUST-SOP-22 dated 12 May 2018). The procedure is described that the identification of raw materials and products derived from certified RSPO plantation is marked using the RSPO Logo on each FFB Delivery Notes for FFB from own estate. Based on the interview with the weighbridge officer, it was explained that Delivery Notes originating from certified areas are given RSPO stamp marks and documentation has been separated between certified and non-certified SPB's.

	Status: Comply
--	-----------------------

E.4	Purchasing and goods in
------------	--------------------------------

E.4.1
The site shall verify and document the volumes of certified and non-certified FFBs received.

The site has verified and documented the volumes of certified and non-certified FFBs received. Certified and non-certified FFB received period of 3 February 2018 to August 2018:

Month	FFB (ton)		
	RSPO Certified	Non Certified	Total
November 2018	10,762	9,667	20,429
December 2018	13,934	12,015	25,949
January 2019	10,198	9,155	19,353
February 2019	13,804	12,363	26,167
March 2019	15,037	13,944	28,981
April 2019	14,145	12,300	26,445
May 2019	15,411	11,981	27,392
June 2019	10,986	8,154	19,140
July 2019	13,781	11,177	24,958
August 2019	14,222	12,105	26,327
September 2019	15,257	13,240	28,497
October 2019	13,990	13,758	27,748
	161,525	139,861	30,386

Based on field observation at ASA 4 in uncertified area (smallholders) which are bordered with certified area, it is found that the area clearly marked and bordered between certified and uncertified area. And according to FFB delivery note is known the separate for FFB certified and uncertified.

The management unit showing sample of FFB Consignment number 11671W0319 from STHE, Division 03 dated 2 November 2019:

- Certified: Block I18a with quantity: 101 FFB's
- Non Certified: Block I18c with quantity: 100 FFB's, Block I19c with quantity: 555 FFB's; and Block I18a with quantity: 33 FFB's.
- Weighbridge ticket number B1819150900, FFB consignment 11671W0319 with quantity: 789 FFB's and Volume: 8,000 Kg.

Status: Comply

E.4.2

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

There is no production of certified products which exceeds the projected for the period of 3 December 2018 to 2 December 2019, the actual and projected details in the following table:

	Last Year Projected Certified Volume (MT)	Last Year Actual Certified Volume (MT)
FFB (tonnes)	231,000	161,525
CPO (tonnes)	53,700	36,794
CSPK (tonnes)	9,700	7,084

Status: Comply

E.5

Record keeping

E.5.1

a. The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and

PK on a real-time basis and / or three-monthly basis.								
b. All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.								
c. The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a site is allowed to sell short. (i.e. product can be sold before it is in stock.)								
Record of all certified palm oil / palm kernel oil volumes purchased (input) and claimed (output) for period of 1 November 2018 to 31 October 2019:								
Period	FFB Received		CSPO			PK		
	Certified	Total FFB	Certified Production	Sold as RSPO	Sold as Conventional	Certified Production	Sold as RSPO	Sold as Conventional
Nov 2018 to Oct 2019	161,525	139,861	36,794	9,434.71	18,000	7,084	-	5,211
Status: Comply								

3.3. Conformity Checklist of Certificate and Trademark Use

1.	Evidence of permission or approval certificate and logo from Certification Body which submitted by Client	X or √
ASA-4	PT Gunajaya Karya Gemilang-Subsidiaries of Bumitama Agri Limited do not use RSPO trademark and CB Logo.	√
	Status: Comply	
2.	Implementation of certificate and logo used by Client comply with size and type (shape) against Guideline of Logo Use	X or √
ASA-4	PT Gunajaya Karya Gemilang-Subsidiaries of Bumitama Agri Limited do not use RSPO trademark and CB Logo.	√
	Status: Comply	
3.	Implementation of Certificate and Logo is not used on product	X or √
ASA-4	PT Gunajaya Karya Gemilang-Subsidiaries of Bumitama Agri Limited do not use RSPO trademark and CB Logo.	√
	Status: Comply	
4.	Controlling of Certificate and Logo, including withdrawing inappropriate logo.	X or √
ASA-4	PT Gunajaya Karya Gemilang-Subsidiaries of Bumitama Agri Limited do not use RSPO trademark and CB Logo.	√
	Status: not applicable	

3.4. Summary of RSPO Partial Certification.

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

Bumitama Agri, Ltd Time Bound Plan is explained in table 1.10. Bumitama Agri, Ltd has informed the Time Bound Plan progress, MUTU has considered that MP Bumitama Agri, Ltd is complied with the RSPO requirement for Time Bound Plan. The Time Bound Plan was revised and declared by Bumitama Agri, Ltd on 2019.

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

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	Based on the document review, there is a company internal audit that was conducted on 2018 and the positive assurance is at this table that is also been verified.
2.1.2	No replacement after dates defined in NIs Criterion 7.3 of: <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. 	<ol style="list-style-type: none"> 1. PT Ladang Sawit Mas <ul style="list-style-type: none"> - LUCA was sent on 16 July 2014 to RSPO - Documents RaCP Plan still review process from RSPO and waiting for approval - HCV was conducted on December 2013 by Sonokeling Akreditasi Nusantara 2. PT Lestari Gemilang Intisawit <ul style="list-style-type: none"> - LUCA was sent on 7 November 2014 to RSPO - Documents RaCP Plan still review process from RSPO and waiting for approval - HCV was conducted on 2013 by Sonokeling Akreditasi Nusantara 3. PT Agro Manunggal Sawitindo <ul style="list-style-type: none"> - LUCA was sent on 7 November 2014 to RSPO - HCV was conducted on July 2013 by Sonokeling Akreditasi Nusantara - Documents RaCP Plan still review process from RSPO and waiting for approval 4. PT Karya Makmur Langgeng <ul style="list-style-type: none"> - LUCA was sent on January 2015 to RSPO

		<ul style="list-style-type: none"> - Documents RaCP Plan are wait for LUCA approved by RSPO - HCV was conducted on July 2013 by Sonokeling Akreditasi Nusantara <p>5. PT Gemilang Makmur Subur</p> <ul style="list-style-type: none"> - HCV was conducted on November 2016 by PT Gagas Dinamika Aksenta. - LUCA was sent on January 2015 to RSPO - LUCA still waiting Review in RSPO <p>6. PT Nabati Agro Subur</p> <ul style="list-style-type: none"> - LUCA was sent on 2018 to RSPO - LUCA still waiting Review in RSPO - <p>7. PT Sejahtera Sawit Lestari</p> <ul style="list-style-type: none"> - LUCA was sent on 2018 to RSPO - LUCA still waiting Review in RSPO <p>8. PT Damai Agro Sejahtera</p> <ul style="list-style-type: none"> - LUCA still calculated by internal BGA - <p>9. PT Windu Nabatindo Sejahtera</p> <ul style="list-style-type: none"> - LUCA was sent on 19 June 2018 to RSPO - HCV was conducted on March 2012 by Faculty of Forestry IPB - Documents RaCP Plan still review process from RSPO and waiting for approval <p>10. PT Andalan Sukses Makmur</p> <ul style="list-style-type: none"> - LUCA was sent on January 2015 to RSPO - Documents RaCP Plan are wait for LUCA approved by RSPO - HCV was conducted on October 2013 by Sonokeling Akreditasi Nusantara <p>11. PT Investa Karya Bhakti</p> <ul style="list-style-type: none"> - LUCA was sent on 13 June 2016 to RSPO - Documents RaCP Plan are wait for LUCA approved by RSPO - HCV was conducted on November 2015 by Sonokeling Akreditasi Nusantara <p>12. PT Langgeng Makmur Sejahtera</p> <ul style="list-style-type: none"> - LUCA sent to RSPO on and - RaCP Plan document are wait for LUCA documents to be submitted and approved by RSPO. - HCV conducted March 2012 by Forestry IPB. <p>13. PT Tanah Tani Lestari</p> <ul style="list-style-type: none"> - LUCA was sent on 14 April 2015 to RSPO - Documents RaCP Plan are wait for LUCA approved by RSPO
--	--	--

		<ul style="list-style-type: none"> - RaCP Plan document has been submitted and waiting for approved by RSPO. - HCV was conducted on August 2014 by Sonokeling Akreditasi Nusantara <p>14. PT Gunajaya Harapan Lestari</p> <ul style="list-style-type: none"> - LUCA was sent on May 2017 to RSPO - Documents RaCP Plan are wait for LUCA approved by RSPO - RaCP Plan document has been submitted and waiting for approved by RSPO. - HCV was conducted on October 2012 by faculty of Forestry IPB <p><i>Auditor verification</i> Based on internal audit results and evidence provided (communication to RSPO on liability disclosure) shows that all subsidiaries of Bumitama has been sent to RSPO and now on progress of LUCA review.</p>
2.1.3	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<ol style="list-style-type: none"> 1. PT Ladang Sawit Mas, NPP was completed publish on 08 October 2014 2. PT Lestari Gemilang Intisawit, NPP was completed publish on 03 July 2014 3. PT Agro Manunggal Sawitindo, NPP was completed publish on 03 July 2014 4. PT Karya Makmur Langgeng, NPP was completed publish on 18 December 2013 5. PT Gemilang Makmur Subur, NPP was completed publish on October 2014 6. PT Nabati Agro Subur, NPP on Process 7. PT Sejahtera Sawit Lestari, NPP on Process 8. PT Damai Agro Sejahtera, NPP on Process 9. PT Andalan Sukses Makmur, NPP was completed for areal 5,630 Ha and publish on 07th February 2014 10. PT Investa Karya Bhakti, NPP was completed for areal 5,700 Ha and publish on October 21th 2016. 11. PT Langgeng Muara Makmur Sejahtera, there is no new planting after January 1st 2010. 12. PT Tanah Tani Lestari NPP Conducted on 2015 but not finished due HCV Documents 13. PT Gunajaya Harapan Lestari, Sanction Mechanism will be applicable
2.1.4	Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	<p>In early 2015 Bumitama rolled out new complaint process (Bumitama Complaint Flow Chart, https://bit.ly/2SQudkk which allocates clear organisational responsibility to ensure that all complaints are being reported and addressed at group-level.</p> <p>Documents verifications, internet checking, there is several land dispute in the company under Bumitama, for example:</p>

		<p>1. PT Windu Nabatindo Sejahtera</p> <p>The company has a SOP on land conflict management (ASM-PAD-SOP-0117.2-ROO) which aims as a provision for the management of the company and related parties in the process of resolving land conflicts that arise based on an agreement with the right holders or parties who have such interests. in the procedure it is stated that the conflict resolution stage begins with the identification of the area / potential land conflicts, the process of resolving land conflicts. In the procedure shows that every conflict is resolved by consultation with other parties agreed facilitation. The conflict resolution process has followed the principles in FPIC.</p> <p>There is land conflict in PT Windu Nabatindo Sejahtera as follows, https://bit.ly/2Wb6wFN the conflict has been resolved with involving all affected party</p> <p>2. PT Hati Prima Agro (a Subsidiary of BUMITAMA AGRI LTD.)</p> <p>Complaints from Sawit Watch</p> <p>Summary of the complaint : As a result of the revocation of the Forest Relinquishment Decree ("2008 Decree") on June 2012 over its area by the local government,. PT Hati Prima Agro's Permit & License validity and legality have been called into question Subsequently, the issuance of Wood Utilization License (IPK) to UD Karya Budi by the Kotawaringin Timur Forestry Agency in Antang Kalang Kotawaringin Timur District, Central Kalimantan was alleged not to be inaccordance with national laws of Indonesia.</p> <p>Complaint Update</p> <table><tr><th>Date</th><th>Status / Update</th></tr><tr><td>13 December 2012</td><td>Warning letter to the Respondent RSPO's response to PT HPA</td></tr><tr><td>07 January 2013</td><td><ul style="list-style-type: none">• Response to RSPO Grievance Panel Preliminary Findings• BGA's letter to RSPO - Response to Preliminary Findings.</td></tr><tr><td>20 May 2013</td><td>The State Administrative High Court in a unanimous decision (Appeal Decision) in the favour of HPA which reaffirmed the Palangkaraya State Administrative Court Decision 12/G/2012/PTUN.PLK dated 4 December 2012. The Administrative High Court decided that the legal considerations of the Palangkaraya Administrative Court Decision were already appropriate and legally correct.</td></tr><tr><td>27 Juny 2013</td><td>Only one of the defendants, the Indonesian Ministry of Forestry submitted an appeal to the Supreme Court to</td></tr></table>	Date	Status / Update	13 December 2012	Warning letter to the Respondent RSPO's response to PT HPA	07 January 2013	<ul style="list-style-type: none">• Response to RSPO Grievance Panel Preliminary Findings• BGA's letter to RSPO - Response to Preliminary Findings.	20 May 2013	The State Administrative High Court in a unanimous decision (Appeal Decision) in the favour of HPA which reaffirmed the Palangkaraya State Administrative Court Decision 12/G/2012/PTUN.PLK dated 4 December 2012. The Administrative High Court decided that the legal considerations of the Palangkaraya Administrative Court Decision were already appropriate and legally correct.	27 Juny 2013	Only one of the defendants, the Indonesian Ministry of Forestry submitted an appeal to the Supreme Court to
Date	Status / Update											
13 December 2012	Warning letter to the Respondent RSPO's response to PT HPA											
07 January 2013	<ul style="list-style-type: none">• Response to RSPO Grievance Panel Preliminary Findings• BGA's letter to RSPO - Response to Preliminary Findings.											
20 May 2013	The State Administrative High Court in a unanimous decision (Appeal Decision) in the favour of HPA which reaffirmed the Palangkaraya State Administrative Court Decision 12/G/2012/PTUN.PLK dated 4 December 2012. The Administrative High Court decided that the legal considerations of the Palangkaraya Administrative Court Decision were already appropriate and legally correct.											
27 Juny 2013	Only one of the defendants, the Indonesian Ministry of Forestry submitted an appeal to the Supreme Court to											

			challenge the decision of revocation of 2008 Decree of revocation, while the Head of Regency did not submit an appeal to challenge the Administrative Court Decision which ordered to revoke the Revocation of Location Permit. As of this letter the case is on the Supreme Court's docket waiting to be heard
	1 December 2013		<ul style="list-style-type: none"> HPA received official notice of appeal from the Palangkaraya Administrative Court that the defendants, the Head of Regency and Ministry of Forestry to the legal proceedings (Appellants) lodged an appeal on the Administrative Court Decision to the State Administrative High Court. Sawit Watch and BGA had meeting during RT 12 in Kuala Lumpur, November 2014 they are planning to have field visit.
	16 December 2013		Sawit Watch's response
	10 Apr 2014		Chronology of Complaint against BAL by Aid Environment
	07 Aug 2014		Bumitama - Announcement of Notice of Appeal
	19 Sep 2014		News release - Clarification on HPA
	16 Oct 2014		Supreme Court Decision - RI
	04 Nov 2014		RSPO letter to BGA on behalf of the Complaints Panel
	09 Jan 2015		BGA announced on SGX that they will be compensated the land new owner, PT Langgeng Makmur Sejahtera with amount IDR 400b for the asset and land
	19 Mar 2015		RSPO's letter to BGA on behalf of the Complaints Panel
	31 Mar 2015		Letter from BGA to RSPO - Ijin Lokasi.
	01 Apr 2015		BGA submitted formal letter, to reaffirm that the status of the conditional sales and purchase has been conducted between PT HPA and PT Langgeng Makmur Sejahtera, as the new owner of the location permit (Ijin Lokasi) and Plantation Business License (Ijin Usaha Perkebunan) of the HPA in accordance with the relevant Indonesian Laws and regulations
	21 Apr 2015		Base on Complaints Panel meeting on 15 April 2015, RSPO Complaints Panel agreed to close this complaint. The formal letter on case closure was sent to BGA on 21 April 2015 by the RSPO Secretariat.
	13 Oct 2017		Secretariat received a request for

			reopening of the previously closed case
		24 Oct 2017	Secretariat forwarded the documents related to the request to re-open the case of PT HPA to Bumitama.
		07 Nov 2017	Secretariat received a response letter from Bumitama
		21 Feb 2018	Secretariat to follow up with the Complainants.
		21 Mar 2018	Secretariat has a meeting with the company to discuss the chronology of the legality Permit for PT. HPA. Secretariat requested the company to provide the copy of the permit for PT. HPA.
		28 Mar 2018	Follow up with the company to provide the copy of the permit for PT. HPA. Secretariat to review the documents from the company
		25 Apr 2018	To follow up with the Company on the copy of the documents and proceed to review the document
		25 May 2018	To commission a legal expert to do a complete review of the documents.
		18 Jun 2018	Follow up action to be discussed further.
		25 Jul 2018	Continue to proceed with the legal review
		23 Aug 2018	Company to be informed of the decision related to cost for the legal review
		26 Sep 2018	The CP's cost directive issued to the respondent and to follow up with the Respondent and the independent legal expert.
		24 Oct 2018	The Respondent agreed on the CP's cost directive. The Secretariat to follow up on the legal review report from the legal consultant
		27 Nov 2018	The Respondent has submitted the necessary documents and it has been forwarded to the legal consultant for review. The Secretariat to follow up on the legal review report from the legal consultant
		19 Dec 2018	The first draft of the legal review has been received from the legal consultant. The Secretariat to circulate it to the CP for review
		<p>PT Bumitama Gunajaya Abadi Complaints from: Sawit Watch Summary of the Complaint : Allegations (1) Dispute on plasma scheme mechanism; (2) Cooperative issues; (3) Claims from 15 members of communities (14 villagers from Kinjil Village and 1 Villager of Sukajaya Village).</p>	

Complaint Update	
Date	Status / Update
26 Oct 2016	A stakeholders meeting held between Sawit Watch and Burnitama facilitated by Secretariat. Both parties agreed to focus on the land claim from 15 villagers and conduct a joint field visit
18 Nov 2016	A meeting between held in Shangri-La Hotel Bangkok. It is agreed that the field visit will be held in early December 2016.
01 Dec 2016	A stakeholders meeting held in Pangkalan Bun, Central Kalimantan. 15 villagers, Sawit Watch, Walhi, PT BGB, RSPO have attended the meeting, facilitated by an independent party - Madyasta Dispute Resolution. All parties have signed an agreement to ensure the safety of the community from intimidation during the conflict resolution process.
02 Dec 2016	A field visit has conducted to check the location alleged by 15 members of communities, followed by a meeting between PT BGB, Sawit Watch and Tim Desa (a Team consists of Head of Villages) to verify the documentation and allegations of the communities. All parties agreed to conduct participatory mapping and document checking on 10 January 2017.
10 Jan 2017	As agreed at the previous stakeholders meeting, a participatory mapping has conducted for 2 days in Kotawaringin Lama. All parties have attended the process, including 15 members of community, Tim Desa, and Sawit Watch, observed by an independent facilitator. A follow-up site visit is scheduled to be conducted in late February 2017
28 Feb 2017	The meeting between parties was held in Kotawaringin Lama, facilitated by an independent facilitator and observed by RSPO
18 Apr 2017	The report of stakeholders meeting has been shared with both parties for their reviews.
31 May 2017	Secretariat continues to communicate between both parties and monitor the progress of the case.
10 Jul 2017	Complainant has submitted an update from the community.
26 Sep 2017	Secretariat will set up a meeting with the complainant.
06 Oct 2017	Secretariat had a discussion with the

	Complainant.
21 Feb 2018	To write a final letter to Sawit Watch to respond
28 Mar 2018	To proceed with the meeting with the Complainants on 1 May 2018.
25 May 2018	To follow up with both parties on the bipartite meeting.
23 Aug 2018	There was a meeting with the Company and facilitator. The next meeting to include an invitation to the head of the village as they are also a stakeholder to the complaint.
26 Sep 2018	To provide briefing notes to the CP summarising the status of the case.
24 Oct 2018	Secretariat to provide the briefing note to the CP.
27 Nov 2018	The Secretariat to provide the briefing note to the CP to support the deliberation
19 Dec 2018	The Secretariat is to set a meeting with the Respondent to seek for clarification. The Secretariat is to finalised the briefing note and circulate it to the CP.

Moreover there is publication from Publication from Greenpeace (10 September 2018 <https://bit.ly/2VJo1g3>)
Link on A Greenpeace International investigation reveals an apparent laundering scheme by the group designed to conceal its connection to numerous concessions during their development without permits or in breach of RSPO rules.

The scheme involved passing nominal control to one or more of a handful of 'third parties' supposedly unconnected to Bumitama. At least 18 plantation companies – one-third of Bumitama's total – passed through the hands of one or more of the 'third parties' before being formally acquired or reacquired by Bumitama, often for a trivial sum.

Greenpeace mapping analysis shows that since 2005, 11,100ha of forest were cleared within the 'laundered' concessions in the three case study areas – nearly 2,300ha of this clearance from 2014 onward.
Under RSPO rules, this should result in Bumitama's expulsion from the RSPO.

About that's issue Bumitama has clarify on 15 November 2018
Bumitama Agri Ltd. And its Group ("Bumitama") would like to assure all stakeholders that the allegations contained in the Greenpeace report named "Dying for a cookie" have already been addressed in our sustainability and annual reports, announcements and earlier news releases. The acquisition of companies from third parties has not been designed to conceal developments without permits or to breach the RSPO

		<p>rules. Given that process of licensing in Indonesia be very long and tedious, Bumitama has at certain occasions preferred acquiring companies furnished with permits for planting</p> <p>Bumitama does acknowledge that there was a period of time when adherence with the RSPO P&Cs displayed a gap and resulted in complaints, but through the conception of our Sustainability policy and by working together with RSPO, Appropriate measures and actions were taken to raise our compliance. Ever since, Bumitama have closely observed the NPP, HCV Assessments to HCV RN review and subscribing to the HCS Approach. Bumitama pursue the complaints procedure for resolution of any outstanding complaints for resolution of any outstanding complaints, which can be tracked through the RSPO Website.</p>
2.1.5	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	<p>Bumitama has put in place a whistle-blowing policy (https://bit.ly/2H7Dtzl), whereby employees or any other persons such as customers, suppliers, contractors or local community may, in good faith and confidence, without fear of reprisals raise concerns about possible improprieties in financial reporting, unethical practices or other matters. Anonymous disclosures will also be accepted and anonymity honoured. The whistle-blowing policy and the procedures put in place to implement such a policy, has been reviewed and approved by our Audit Committee. Whistle blowing can be initiated via text/call to mobile number +6281286419700 or email to audit.pengaduan@bumitama.com</p> <p>The Group provides another hotline channel for employees to convey their complaints, which are primarily HR-related concerns.</p>
2.1.6	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	<p>The company has had legal documents as follows</p> <ol style="list-style-type: none"> PT Sentosa Prima Agro <ul style="list-style-type: none"> - Land Use Title Documents No 2 year of 1999 covering 3,087 Ha - Plantation Permit No 522/DISBUN-D/2016 from Head of Ketapang Regency PT Raya Sawit Manunggal <ul style="list-style-type: none"> - Land Use Title Documents No 6 year of 1995 covering 4,034 Ha - Plantation Permit No 521/Disbun-D/2016 from Head of Ketapang Regency PT Wahana Hijau Indah <ul style="list-style-type: none"> - Land Use Title Documents No 7 year of 1995 covering 4,391,68 Ha - Plantation Permit No 520/Disbun-D/2016 from Head of Ketapang regency PT Sejahtera Sawit Lestari <ul style="list-style-type: none"> - Location Permit No 267 year of 2007 dated 28 June 2007 from Head of Ketapang Regency

		<ul style="list-style-type: none"> - Location Permit No 680 year of 2013 dated 31 December 2013 from Head of Ketapang Regency - Enviromental Permit No 450/KLH-N/2014 dated 09 January 2014 - Plantation Permit No 239/Disbun-D/2014 dated 25 March 2015 -
		<p>5. PT Karya Makmur Langgeng</p> <ul style="list-style-type: none"> - Location Permit No 293 year of 2006 dated 04 September 2006 from Head of Ketapang Regency - Extension Location Permit No 24 year of 2010 dated 13 January 2010 from Head of Ketapang Regency - Forest release decree No SK.689/Menhut-II/2011 08 December 2011 - Plantation Permit No 510/DISBUN-D/2013 dated 16 October 2013 -
		<p>6. PT Lestari Gemilang Inti Sawit</p> <ul style="list-style-type: none"> - Location Permit No 459 year of 2011 dated 07 November 2011 from Head of Ketapang Regency - Plantation Permit No 307/Disbun-D/2013 dated 17 June 2013 - Enviromental Permit No 284 /2009 dated 20 May 2009 -
		<p>7. PT Agro Manunggal Sawitindo</p> <ul style="list-style-type: none"> - Location Permit No 458 year of 2011 dated 04 September from Head of Ketapang Regency - Extension Location Permit No 449 year of 2015 dated 29 June 2015 - Plantation Permit No 3080/DISBUN-D/2013 dated 17 June 2017 -
		<p>8. PT Ladang Sawit Mas</p> <ul style="list-style-type: none"> - Principle permit No 525/504/IV-Bapedalpemnda dated 27 October 2015 - Location Permit No 172 year of 2006 dated 14 June 2006 from Head of Ketapang Regency - Extension Location Permit No 415 year of 2009 dated 09 November 2009 - Plantation Permit No 420 year of 2010 dated 28 July 2010 - Enviromental Permit 49/BLHD/2010 dtaed 27 Januar 2010 -
		<p>9. PT Gemilang Makmur Subur</p> <ul style="list-style-type: none"> - Principle permit No 525/263/DPU-E dated 27 March 2014 - Location Permit No 272 year of 2015 dated 02 April 2015 from Head of Ketapang Regency - Plantation Permit No 773?DISBUN-D/2015 dated 27 November 2015

		<ul style="list-style-type: none"> - Enviromental Permit 743/KLH-B/2015 dated 3 November 2015 - <p>10. PT Nabati Agro Subur</p> <ul style="list-style-type: none"> - Principle permit No 525/96/DPU-E dated 05 February 2014 - Location Permit No 456 year of 2014 dated 18 March 2014 from Head of Ketapang Regency - Plantation Permit No 238/DISBUN-D/2015 dated 25 March 2015 - Enviromental Permit 47/KLH-B/2015 dated 12 January 2015 <p>11. PT Damai Agro Subur</p> <ul style="list-style-type: none"> - Principle permit No 525/704/DPU-E dated 05 February 2014 - Location Permit No 27 year of 2014 dated 08 January 2016 from Head of Ketapang Regency - Plantation Permit No 576/DISBUN-D/2016 dated 25 August 2016 - <p>12. PT Windu Nabatindo Sejahtera</p> <ul style="list-style-type: none"> - Principle Permit about location No. 02.04.28/525.26/463/XI/Ek bang/03, 8th November 2003 for areal 7,000 Ha. - Location Permit SK Dictirict Kotawaringin Timur No. 165.460.42, 26 February 2004 for 5,370 Ha - IUP No. 525.26/152/V/Ek bang/2004, 17 May 2004 for 5,370 Ha - Permit Location No. 374.460.42, December 13 2006 for 5,000 Ha (Revision) - IUP No. 525.26/386/V/Ek bang/2007, May 30th 2007 for areal 5,000 Ha (Revision) - Kadastral Map No. 355-15.05-2007, July 6th 2007 for areal 4,998.76 Ha - Land Tittle application letter NO 003/WNS-Dir/VII/2007, July 11th 2007 for areal 5,000 Ha. - Minutes of Committee B (Risalah Panitia B) No 23/HGU.RPD/IX/42/2007 dates 25 September 2007 with covering 4,998.76 Ha. <p>13. PT Andalan Sukses Makmur</p> <ul style="list-style-type: none"> - Principle Permit about location, decree from head of Dictirict Kotawaringin Barat No.590/105/Pem-XI/2012, November 21 2012 for areal 9,000 Ha. - Location Permit SK Dictirict Kotawaringin Barat No.525/68/XII/2012, December 18th 2012 for 9,275 Ha - IUP No. 525/45/ek, 06 February 2013 - HGU on process. <p>14. PT Investa Karya Bhakti</p> <ul style="list-style-type: none"> - Principle Permit about location No. 590/09.Pem-
--	--	---

		<p>II/2014, 3rd February 2014 for areal 14,500 Ha.</p> <ul style="list-style-type: none"> - Location Permit SK District Kotawaringin Barat No. 525/62/IX/2014, 1st September 2014, 11,746.74 Ha - IUP No. 525/014/EK, April 21 2015, 5,700 Ha - Land Title application letter NO 003/WNS-Dir/VII/2007, July 11th 2007 for areal 5,000 Ha. <p>15. PT Langgeng Makmur Sejahtera</p> <ul style="list-style-type: none"> - Principle Permit about location No. 525.21/660/Ek.SDA/IX/2014 dated 12 September 2014 5,325 Ha - Location Permit SK District Kotawaringin Timur No. 188.45/330/Huk-BPN/2014, 23 September 2014 5,370 Ha - Environment Permit No. 660/2140/BLH-Ek.SDA/2015, 19 October 2015 for 5,325 Ha - IUP No. 188.45/490/Huk-Ek.SDA/2014, 19 December 2014 4,810.72 Ha - SK HGU No. 5/HGU/KEM-ATR/BPN/2017, January 10th 2017. <p>16. PT Tanah Tani Lestari</p> <ul style="list-style-type: none"> - Principle Permit about location No. 525.21/439/VII/EK.SDA/2012 dated 03 September 2012 - Forest Release permit 4/1PKH/PMA/2017 dated 30 January 2017 - Plantation Permit No. 188.45/490/Huk-Ek.SDA/2013, 31 January 2013 - Land Use Title Degree No 59/HGU/BPN dated 27 September 2016 <p>17. PT Gunajaya Harapan Lestari</p> <ul style="list-style-type: none"> - Principle Permit about location No. 525/426/Bappeda-D year of 2007, 08 May 2007 for areal 3,000 Ha. - Location Permit SK District Kendawangan No. 265 year of 2007, 28 June 2007 for 3,000 Ha - Revision Location Permit No. 370 year of 2008, 07 October 2008 for 3,000 Ha - Extension Location Permit No. 415 year of 2010, 27 July 2010 for 3,000 Ha - IUP No. 365/DISBUN-D/2012, August 23rd 2012 for 1,750 Ha - HGU No. 62/HGU/KEM-ATR/BPN/2016, 1,973.45 Ha <p>Auditor verification Land legal process is still going on and there is a detail update progress documented by the company for each year.</p>
--	--	--

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-3 Assessment

NCR No.	: 2018.01	Issued by	: Radytio Puspanjana & Leonada			
Date Issued	: 28 September 2018	Time Limit	: 27 Desember 2018			
NC Grade	: Major	Date of Closing	: 23 October 2018			
Standard Ref. & Requirement	: 5.2.2 If species are rare, threatened, or endangered (rare, threatened or endangered or RTE), or HCV, located at the site, or affected, plantation operations or palm oil mills, the steps to maintain and / or protect them must be implemented through a plan. management.					
Non-Conformance Description & Evidence observed (filled by auditor): Based on document verification and field visits known: - There are pesticide application activities at the canal riparian Block Q24 Seriam Jaya Estate PT GKS. - Daily report foreman of Seriam Jaya Estate for pesticide spraying activity blocked Q24 September 22, 2018. The implementation of HCV management is not yet in accordance with the recommendations of HCV identification 2012 and the SOP for the management and maintenance of water resources and quality (BGA-SOP-CCS-1113 approved 2012).						
Root Cause Analysis (filled by organization audited): Lack of understanding of spraying workers related to HCV management and lack of control from assistant.						
Correction (filled by organization audited): 1. Socialization of HCV Management procedure to all employees by manager / assistant. 2. Monthly monitoring the management of HCV by HCV Officers.						
Corrective Action (filled by organization audited): 1. Internal Audit Implementation. 2. Implementation of Management Review either by unit or by Sustainability Corporate Head Office						
Assessor Evaluation and Conclusion (filled by auditor): Auditor Verification, 23 October 2018. The company shows evidence of corrective: 1. The BSS internal training report on 29 September 2018 in Block Q24 / 25 concerning the prohibition of not repeating the spraying of HCV areas by BSS members at the sustainability SJYE PIC facility, which was followed by all sprayers (BSS). Attendance and photos of activities are attached. 2. Plans and implementation of the HCV Seriam Jaya Estate Management Activities 2016 - 2018 that are made by HCV Supervisor and approved by the PT GKS Controller Area which explains monitoring / patrol maintenance of markers and signposts and prohibitions every month, such as monitoring the MB-2 Canal border has been realized in June, July and August.						

Based on the evidence of corrective above, NCR 2018.01 is stated to be Closed and will be observed again in the next assessment activity. **(Closed with observation)**

Verified by : **Radytio Puspanjana & Leonada**

NCR No.	: 2018.02	Issued by	: Radytio Puspanjana & Leonada
Date Issued	: 28 September 2018	Time Limit	: 27 Desember 2018
NC Grade	: Major	Date of Closing	: 26 November 2018
Standard Ref. & Requirement	: 5.3.2 There must be evidence that all chemical waste, the container is disposed of responsibly.		
Root Cause Analysis (filled by organization audited): The implementation hazardous waste management hasn't accordance with hazardous waste management plan (SOP BGA-SUST-SOP-21 May 12, 2018). This was indicated by field visits be found: <ul style="list-style-type: none">- Pesticide (Dithane M – 45) has expired since September 4, 2014 at MUTE agrochemical warehouse.- Used apron pesticides contaminated and paint cans at fire equipment warehouse KNDE.- Used pesticide container (Roundup) for fuel container and radiator water shelter in generator room in housing complex KNDE Division II.- Used diesel drums, used cans paint, pesticide sprayer damage, at outside hazardous waste storage.- Hazardous used air purifier container (Nalco 2811) as a container for collecting turbine lubricant at Kendawangan POM.			
Root Cause Analysis (filled by organization audited): Lack of understanding of related employees in each work unit about hazardous and toxic material waste management and lack of control from HSE Officer from each work unit.			
Correction (filled by organization audited): <ol style="list-style-type: none">1. Manager of MUTE coordinates with the Internal Audit to taking Dithane M - 45 Chemicals expired from 4 September 2014 at the MUTE agrochemical warehouse & furthermore sending Dithane materials that expired into hazardous and toxic material waste and managed according to hazardous and toxic material waste Management procedure.2. Transferring used Apron that contaminated with pesticides & used paint cans in KNDE fire extinguishers warehouse and also used Roundup pesticide packaging for solar storage and radiator water storage at the KNDE division II housing generator set to licensed hazardous material waste warehouse.3. Move used solar drum, used paint cans, pesticide spray equipment damaged to hazardous and toxic material waste warehouse.4. Transfer the used Nalco 2811 packaging to hazardous and toxic material waste warehouse.			
Corrective Action (filled by organization audited): <ol style="list-style-type: none">1. Socialization of hazardous and toxic material waste management procedure to all related employees in each of the Work Units by the relevant HSE.2. Monthly K3L inspection by the relevant HSE Officer3. Management Review.			

Assessor Evaluation and Conclusion (filled by auditor):**Auditor Verification, 23 October 2018.****The company shows evidence of corrective:**

- Socialization of the hazardous material waste management procedure to officers on 1 October 2018, in Metro Kendawangan clinic of PT GKG region, made by officer's hazardous material waste warehouse, was known by the coordinator doctor of West Kalimantan, and sustainability specialist. (Attached attendance list and photo documentation).
- Request for the elimination of CYNOFF material stock inventory which has expired since 13/8/2015 on 27/9/2018 made by the West Kalimantan Coordinating Doctor and has been approved by the Warehouse Assistant. There is an official report on hazardous material waste as much as 7 cans of CYNOFF material submission on 27/9/2018 to the hazardous and toxic material waste warehouse. (attached photo of surrender activity and photo checking by internal audit) → **Comply**.
- Socialization of the prohibition on the use of NALCO used packaging on 25/9/2018 regarding hazardous and toxic material waste management (attached photo documentation for activity activities). Statement from the engine room operator will not use NALCO packaging for turbine oil change containers → **Comply**.
- Official record the transfer of hazardous and toxic material waste KNDE to hazardous and toxic material waste warehouse of PT GKG on 25/9/2018 with details: used drum waste contaminated 55 pcs, spray tool damaged 150 pcs (attached photo documentation of activities). Official record of socialization 29/9/2018 in Central Workshop PT GKG related to hazardous and toxic material waste management at work sites. (attached photo of activity documentation and attendance list) → **Comply**.
- Official record transfer of hazardous and toxic material waste dated 25/9/2018 related to contaminated used apron, used rag, used containers of pesticides for oil storage. Evidence of corrective: socialization of the use of PPE and earmuff replacement, replacing the former container of pesticide packaging for oil storage, sending all of the waste found to hazardous and toxic material waste warehouse of PT GKG (Evidence that it has been stored in TPS Waste B3 central PT GKG) → **Not Comply**.
- Official record transfer of the hazardous and toxic material waste dated 25/9/2018 related there are spilled oil, used packaging containers for fuel storage. Evidence of corrective: documentation of citing contaminated land, replacing containers of used pesticide containers for fuel storage, sending all of the waste found to hazardous and toxic material waste warehouse of PT GKG. (Proof that it has been stored in hazardous and toxic material waste warehouse of PT GKG) → **Not Comply**.
- Official record transfer of the hazardous and toxic material waste dated 25/9/2018 related to an oil trap leak at the old generator house. Evidence of corrective: scraping contaminated laterite and hoard back, quoting oil in the oil trap and making the oil trap cover to avoid rain (attached photos of repairs), what is the status of oil from the oil trap, contaminated soil? Where is it stored? What is recording? (Proof of management record) → **Not Comply**.
- Request for removal of Dithane M45 stock inventory which has expired since 11/11/2014 on 26/9/2018 made by Manager MUTE and has been approved by Research Assistant. There is an official report on the submission of hazardous and toxic material waste from MUTE dated 27/9/2018, the Dithane M45 material expands as much as 4 kg to the hazardous and toxic material waste warehouse PT GKG. (attached photo of handover activity and photo of checking by internal audit) → **Comply**.

Conclusion**The company needs to show the recorded storage / log book of hazardous and toxic material waste:**

- Quoting contaminated land, replacing used containers of pesticide packaging for fuel storage to hazardous and toxic material waste warehouse PT BKG.

- Used contaminated apron, used rag, used pesticide container for oil storage to hazardous and toxic material waste warehouse PT GKG.
- Where oil from oil traps and contaminated soil is stored? Is there a recording? Please send proof?

Based on the evidence of corrective above, NCR 2018.02 is stated **Not Comply**.

Auditor Verification, 26 November 2018.

The company shows evidence of corrective:

- Official record dated 9/25/2018 regarding the submission of used NALCO waste previously used for turbine oil change containers, as many as 3 pcs weighing 1.5 kg. The official record was prepared by PIC sustainability and was known to be responsible for hazardous and toxic material waste warehouse.
- The official record on hazardous and toxic material waste extermination on 25/9/2018 is related to contaminated used apron spray, used rag, and the use of used pesticide containers for oil storage.
- Official record of hazardous and toxic material waste KNDE dated 9/25/2018 No. 012 / GKG-LB3 / X / 2018 related to submission of contaminated hazardous and toxic material waste 0.005 tons, used oil 0.020 tons, used pesticide containers 0.003 (attached documentation in the form of activity photos).
- Official record collection of used oil in Oil trap KNDE generator house on 25/9/2018 (attached documentation in the form of activity photos).
- The company shows the status logbook of hazardous and toxic material waste warehouse PT GKG for hazardous and toxic material waste stored on 25/9/2018 from KNDE namely 0.020 tons used oil, contaminated goods (pesticide used containers) 0.003 tons, contaminated soil (0.005 tons), KNDE goods contaminated (used packaging NALCO 2811) as much as 0.001 tons.

Conclusion

Based on the evidence of corrective submitted, **NCR. No. 2018.02 is stated Closed.**

Verified by : Radytio & Leo

NCR No.	:	2018.03	Issued by	:	Marsudi Eko Santoso
Date Issued	:	28 September 2018	Time Limit	:	ASA 4
NC Grade	:	Minor	Date of Closing	:	06 November 2019
Standard Ref. & Requirement	:	6.10.4. The agreed payment must be paid on time			
Non-Conformance Description & Evidence observed (filled by auditor):					
Based on the results of document review and interviews with Commercial Section Staff regarding agreements with local businesses, for example Local FFB Purchase Agreement No. 002 / SPKL / KNDM-TBS / I / 2018 in Article 5 paragraph 4 states that payment is carried out by the First Party (Kendawangan Mill) by transferring to the Second Party account (CV IGVAM) up to 10 working days from the date the invoice is received (August 16 2018). The company shows evidence of payment for the invoice on August 29, 2018. This shows that the company has not fully implemented payments for local businesses are on time.					
Root Cause Analysis (filled by organization audited):					
Finance administration process is needed several approval from the managements.					
Correction (filled by organization audited):					

1. Make a new agreement related to the time of the new payment 2. Make payments according by new agreement (25 working days after invoice published)
Corrective Action (filled by organization audited): Monitor payments in accordance with the new agreement and evaluate every year / 1 month before the validity period by head of administration.
Assessor Evaluation and Conclusion (filled by auditor): Verification November 6, 2019 The company shows evidence of improvement as follows : 1. Addendum of Local FFB Purchase Agreement Number. 002 / SPKL / KNDM-TBS / I / 2019 dated January 1, 2018 with CV IGAM, in article 5 paragraph 2 it is explained that payment via bank transfer with a maximum of 25 working days. 2. Based on the results of interviews with the IGAM CV contractor when ASA-4 explained that so far the average payment is 15 days after minutes of work letter. Auditor Conclusion: Based on the evidence of the explanation above, then this discrepancy has been comply.
Verified by : Radytio P

NCR No.	: 2018.04	Issued by	: Leonada
Date Issued	: 28 September 2018	Time Limit	: 27 December 2018
NC Grade	: Major	Date of Closing	: 23 October 2018
Standard Ref. & Requirement	Certification system 4.1.3 The mill shall develop and implement a plan to ensure that 100% of scheme smallholders and scheme outgrowers are compliant with the standard within three years of the mill initial certification. In monitoring compliance with this timeline, the CB shall raise an observation after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.		
Non-Conformance Description & Evidence observed (filled by auditor): Kendawangan POM has agreements and received FFB from smallholders scheme, such as: GKG - Usaha Bersama Cooperative: agreement No. 01/PKS-GKG/VIII/2008 dated 25 August 2008 - Karya Bersama Cooperative: agreement No. 01/PKS-GKG/VIII/2008 dated 25 August 2008 - Binasari Cooperative: agreement No. 01/PKS-GKG/VIII/2008 dated 25 August 2008 - Sawit Bersama Cooperative: agreement dated 6 February 2012 GKS - Rimba Sari Cooperative: agreement No. 01/PKS-GKS/V/2017 dated 15 May 2017 - Fajar Mandiri Cooperative: agreement dated 27 October 2010 - Sawit Makmur Cooperative: agreement No. 001/SKK SM-GKS/IV/2015 dated 5 April 2015 The smallholders units has included in timebound plan of Bumitama Agri Ltd on 2018. But until ASA 3 the smallholders has not been certified yet. This matter can be state that the certificate holders can't develop and implement a plan to ensure that 100% of scheme smallholders and scheme outgrowers are compliant with the standard within three years.			

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

Poor coordination of CSC Dept. with related parties internally and with the MAL Certification Body to prepare a proposal for a certification audit for Plasma PT. GKG & PT. GKS

Correction *(filled by organization audited):*

1. Coordinate with Lead Auditor & Auditor Manager of MAL regarding corrective action for compliance with Clause 4.1.3 Certification System.
2. Submission of RSPO Certification Audit Proposal for Plasma PT. GKG & PT. GKS.

Corrective Action *(filled by organization audited):*

CSC Dept. will improve coordination with relevant parties and carry out management reviews for the fulfillment of the entire certification system in accordance with the Time Bound Plan.

Assessor Evaluation and Conclusion *(filled by auditor):*
Auditor Verification, 23 October 2018

The company shows the application form for the certification of 7 plasma cooperatives to CB PT. MAL on 3 October 2018. PT. MAL responded to this on 10 October 2018 and is currently in the process of entering into a certification contract for the cooperative units. Based on the process indicated, the current nonconformities can be declared closed and the realization of the cooperative unit certification will be verified again in the next ASA. **Closed with Observation.**

Verified by	:	Leonada
--------------------	----------	----------------

3.5.2 Identification of Findings, Corrective Actions and Observations at ASA-4 Assessment

NCR No.	: 2019.01.	Issued by	: Haikal Ramadhan Kharismansyah			
Date Issued	: 7 November 2019	Time Limit	: Recertification			
NC Grade	: Minor	Date of Closing	:			
Standard Ref. & Requirement	: 4.1.2 Checking or monitoring of operation procedures is conducted at last once a year.					
Evidence observed (filled by auditor): <ul style="list-style-type: none"> Based on information received from the management representatives of PT GKG and PT GKS, it is known that the form of cooperation with third parties includes the transportation of FFB, the transportation and loading and unloading of fertilizers and the transport of CPO / kernel. Based on field observation to the central warehouse known in a loading and unloading activity carried out by one of the contractors and the workers did not use PPE Demonstration of the importance of the use of PPE to contractor workers has been demonstrated on April 6 and November 05 2019. Also attached is evidence of transfer of PPE to 7 contractor workers for loading and unloading of fertilizer. However, a comprehensive identification and system to ensure that RSPO certification standards have not been implemented and adhered to by all contractors cannot yet be demonstrated 						
Non-Conformance Description (filled by auditor): Thus it can be concluded that the company has not been able to demonstrate the existence of a mechanism to ensure compliance with the RSPO standard for all contractor workers, for example in terms of the obligation to use PPE, wages, health insurance and work accident insurance.						
Root Cause Analysis (filled by organization audited):						
Correction (filled by organization audited):						
Corrective Action (filled by organization audited):						
Assessor Evaluation and Conclusion (filled by auditor):						
Verified by	:					

NCR No.	: 2019.02.	Issued by	: Trismadi N
Date Issued	: 7 November 2019	Time Limit	: 6 February 2020
NC Grade	: Major	Date of Closing	: 21 January 2020
Standard Ref. & Requirement	: 4.6.11. Annual medical records of pesticide operators, and follow-up treatment of medical results, shall be available		
Evidence observed (filled by auditor):			

1. The CH has conducted medical checkup for pesticide applicators dated 4 July 2019, for example STHE: there are 23 pesticide applicators, however it only 13 applicators who followed medical checkup.
2. Based on interview with the paramedic that the medical checkup for pesticide applicators and fertilizing applicators was conducted by sampling on this year, it consider date of joint with the company. Other than that, he was explaining that the full medical check up for that sample workers such as: Hematology, cholinesterase, macroscopic and microscopic urine.

Non-Conformance Description (filled by auditor):

However, the CH has not been able to show that all pesticide applicators followed on annual medical checkup.

Root Cause Analysis (filled by organization audited):

Lack coordination between medical team with the unit management regarding to amount of chemical applicators and manuring workers.

Correction (filled by organization audited):

1. The management unit has identified amount of BSS and BMS workers which not followed medical check up.
2. The management unit has conducted medical check up dated 10 – 12 December 2019 to all BSS and BMS workers.
3. The management unit has socialized result of medical check up for workers.

Corrective Action (filled by organization audited):

Medical check up program year of 2020 will be re check by the RSPO internal audit team (sustainability department) to ensure that all BSS and BMS workers including on this activities.

Assessor Evaluation and Conclusion (filled by auditor):
Verification on 21 January 2020

The management unit was shown several evidences, such as:

1. Minute of medical check up activities on PT GKG and PT GKS dated 10 to 12 Decemeber 2019, all BSS team from five estates with 118 BSS workers and 177 BMS workers. The medical checkup for *Hematologi, cholinesterase, urine mcroscopics and urine microscopics*.
2. Minute of socialization medical check up result dated 9 January 2020 to all of BSS and BMS workers in Banjar Sari Estate.
3. Minute of socialization medical check up result dated 9 January 2020 to all of BSS and BMS workers in Membuluh Estate.
4. Minute of socialization medical check up result dated 10January 2020 to all of BSS and BMS workers in Tapah Estate.
5. Minute of socialization medical check up result dated 9 January 2020 to all of BSS and BMS workers in Seriam Jaya Estate.
6. OHS work program year of 2020 sighted that medical check up will be conducted on June 2020.

Auditor conclusions:

Based on above explanations sighted that this nonconformities has been closed.

Verified by : **Trismadi N**

NCR No.	: 2019.03.	Issued by	: Trismadi N
Date Issued	: 7 November 2019	Time Limit	: Recertification
NC Grade	: minor	Date of Closing	:

Standard Ref. & Requirement	4.7.6. All workers shall be provided with medical care, and covered by accident insurance (see criterion 6.5.3).
Evidence observed (filled by auditor): <ol style="list-style-type: none"> Based on list of workers on October 2019 there are 1,683 workers in PT GKG and 1,826 workers in PT GKS. Dues of <i>BPJS Ketenagakerjaan</i> of PT GKS on October 2019 has been paid dated 15 October 2019 for 1,791 workers. Dues of <i>BPJS Ketenagakerjaan</i> of PT GKG on October 2019 has been paid dated 15 October 2019 for 1,568 workers. Dues of <i>BPJS Kesehatan</i> of PT GKS on October 2019 has been paid dated 10 October 2019 for 181 workers and 237 person in their family. Dues of <i>BPJS Kesehatan</i> of PT GKG on October 2019 has been paid dated 10 October 2019 for 290 workers and 536 person in their family. Dues of <i>BPJS Ketenagakerjaan</i> of PT GKG-Mill on October 2019 has been paid dated 15 October 2019 for 131 workers. Based on interview with HR Regional-4A Assistant sighted that registration of <i>BPJS Kesehatan</i> for the workers and their family will be gradual. For example: registration on behalf mr SDK in KNDM dated 29 October 2019. Based on monitoring data there are 13% from 3,509 workers and their family had been register on the <i>BPJS Kesehatan</i>. 	
Non-Conformance Description (filled by auditor): The CH has not been able to show that all workers been registered on the health insurance.	
Root Cause Analysis (filled by organization audited):	
Correction (filled by organization audited):	
Corrective Action (filled by organization audited):	
Assessor Evaluation and Conclusion (filled by auditor):	
Verified by	:

NCR No.	:	2019.04.	Issued by	:	Radytio Puspanjana
Date Issued	:	07 November 2019	Time Limit	:	6 February 2020
NC Grade	:	Major	Date of Closing	:	27 January 2020
Standard Ref. & Requirement	:	6.5.2 Collective labor agreement / company regulation, in accordance with the manpower regulation, in accordance with the manpower regulations, shall be available in understandable language; and explained by the management of labor union to the			

	workers.
Evidence observed (filled by auditor): <ul style="list-style-type: none"> - Contracts are available for permanent workers (<i>pegawai tetap harian</i>) October 15 2019 for Lose fruit collection worker, on agreement letter point 5 validity period 12 month October 23 2019 to October 23 2020. - Based on field visits and interviews with Lose fruit collection worker Block K-17, division 2, BSRE known that started working since 15 October 2019 as permanent workers (<i>pegawai tetap harian</i>). - Based on interview with management (CH), it was explained Lose fruit collection worker have a status permanent workers (<i>pegawai</i>), while the 12 month period (October 23, 2019 to October 23, 2020) is probation period. - Regulation government number. 13 of 2003 concerning manpower article 60 paragraph 1 explains "Work agreements for permanent workers (<i>Perjanjian kerja untuk waktu tidak tertentu</i>) required for probation period is 3 months maximum. 	
Non-Conformance Description (filled by auditor): Work agreements by employees of Lose fruit collection worker block K-17 division II BSRE are not accordance with Regulation government number. 13 of 2003 concerning manpower, for example: <ul style="list-style-type: none"> - Not yet explained the kind of work. - Not yet explained the rights and obligations of worker (Health assurance, labor assurance etc.). 	
Root Cause Analysis (filled by organization audited): Lack of knowledge from the BSRE personnel department is related the regulations a Work Agreement, so initiating to create a separate work agreement format (not standart).	
Correction (filled by organization audited): <ol style="list-style-type: none"> 1. Identification by HRD related to the problem of format Worker Agreement on all Unit and socialization to all department related to appropriate work agreement. 2. Making / improving BSRE unit employee work agreements. 3. Minutes of handover, agreement worker letters. 	
Corrective Action (filled by organization audited): Monitoring through internal audit mechanisms and management review meetings involving HRD / personnel and new work agreements as of January 13, 2020 must go through regional HRD (signed by regional HRD).	
Assessor Evaluation and Conclusion (filled by auditor): Auditor verification 27 January 2020 The company shown evidence consist of : <ul style="list-style-type: none"> - Minutes of inventory of permanent workers agreements (<i>pegawai tetap harian</i>) for PT GKG & PT GKS region 4 A on January 2020 explained : <ul style="list-style-type: none"> • Monitored of new permanent workers agreements (<i>pegawai tetap harian</i>). • The appointment for new permanent workers shall signature by HRD for agreements letter form standart. - Minutes of workers agreements letter on 17 January 2020 for 4 workers. - The permanent workers agreements (<i>pegawai tetap harian</i>) letter for name Boni on 15 October 2019 explained the kind of work is upkeep worker and rights and obligations of worker Health assurance, housing, PPE and labor assurance (BPJS TK, BPJS Kesehatan). - The permanent workers agreements (<i>pegawai tetap harian</i>) letter for name Lucia Yenny Bunganna on 15 October 2019 explained the kind of work is upkeep worker and rights and obligations of worker Health assurance, housing, PPE and labor assurance (BPJS TK, BPJS Kesehatan). - The permanent workers agreements (<i>pegawai tetap harian</i>) letter for name Risma Krismonia on 15 October 2019 explained the kind of work is upkeep worker and rights and obligations of worker Health assurance, housing, PPE and labor assurance (BPJS TK, BPJS Kesehatan). 	

Auditor conclusions:

Based on above explanations sighted that this nonconformities has been closed.

Verified by : **Radytio Puspanjana**

NCR No.	: 2019.05.	Issued by	: Radytio Puspanjana
Date Issued	: 07 November 2019	Time Limit	: Recertification
NC Grade	: Major	Date of Closing	:
Standard Ref. & Requirement	: 7.3.1 A There shall be evidence that no new plantings have replaced primary forest, or any area required to maintain or enhance one or more High Conservation Values (HCVs), since November 2005. New plantings shall be planned and managed to best ensure the HCVs identified are maintained and/or enhanced (see Criterion 5.2).		
Evidence observed (filled by auditor): Based on the RACP document endorsement in form of LUC analysis verification the result for PT GKG liability area is 883.51 ha multiplied by 0.7 so the conservation liability area is 618.46 ha and PT GKS liability is 532.30 ha multiplied by 0.7 so the conservation liability (liability compensation) is 372.61 ha. Bumitama Agri Ltd has submitted Liability Disclosure and LUCA for PT GKG & PT GKS to RSPO Compensation Plan January 29 2018 and declared PASS .			
Non-Conformance Description (filled by auditor): However, until the ASA-4 audit, there was no evidence the RAC-Plan for PT GKG & PT GKS had been approved by the RSPO.			
Root Cause Analysis (filled by organization audited): The long review process from the HCV Compensation Panel related to the approval of the HCV Compensation Panel PT. GKG & PT GKS.			
Correction (filled by organization audited): Submit a proposal for delaying the time limit for repairs related to indicator 7.3.1 (approval from the HCV Compensation Panel) to the RSPO Secretariat.			
Corrective Action (filled by organization audited): Conduct intensive communication with the HCV Panel compensation so immediately approve the HCV Compensation Plan of PT. GKG & PT GKS.			
Assessor Evaluation and Conclusion (filled by auditor): Auditor verification November 19 2019 There email dated 11/14/2019 11:30 from Khing Su Li khing.suli@rspo.org stating the RAC-Plan of PT. GKG and GKS are still on review. There is RSPO response dated 23/09/2019 15:20 aimy.nadiah@rspo.org regarding RAC-Plan Bumitama Agri Ltd status, which states the company can continue the certification process with NC major status 7.3.1 still open until the next surveillance audit.			

Verified by	: Radytio Puspanjana

3.5.3 Noteworthy Positive Components

No	Description
1	The company's commitment to sustainable palm oil management
2	Award from the Ministry of Environment and Forestry (Corporate Performance Rating Program in Environmental Management - Blue PROPER, 2017 - 2018).
3	Providing adequate education facilities
4	Availability of Block Spraying System, Block Harvesting System and Block Manuring System on operational activities
5	The company have obtained an ISPO certificate

3.5.4 Opportunity for Improvement

No	Ref. Std.	Description
1	4.4.3.	Periodic monitoring quality of POME from Mill boiler blowdown before it is flowed into the environment.
2	4.7.1.	The CH to be consider to follow up the medical check up result in accordance to the predetermined schedule.
3	4.7.2.	<ol style="list-style-type: none"> 1. The CH already evaluated the HIRAC every year, for example: the estates unit dated 24 June 2019. Based on the work accident report in 2019 there were four snake bite incidents on estates of PT GKS. The company to be consider to evaluating the potential danger of snakebites in the all estates operations. 2. The potential hazard of pesticide applications is chemical exposures to body. Risk control is PPE's providing to all workers. The CH to be consider to explaining the specific PPE's type.
4	4.7.3.	The CH to be consider to evaluate frequency of PPE condition inspection, moreover it consider to evaluate PPE's distribution system from the Metro Kendawangan Central Storage to the each of estates.
5	5.1.2 & 5.1.3.	<p>Completeness of implementation reports of management and monitoring activities that have been carried out include:</p> <ul style="list-style-type: none"> - Water Management (drainage and subsidence) - Factory solid waste - Domestic waste - Plant disease pests - Public health <p>Format of the <i>RKL-RPL</i> implementation report refers to KepMenLH No. 45 of 2005.</p>

6	5.2.4.	Increased frequency of land fire monitoring in HCV areas in dry season
7	5.3.3.	- Review hazardous time limit of waste storage and scope of permit (clinical waste). - Review of use of furnaces for EFB and fibers.
8	6.1.4.	(Management and monitoring plan for SIA re-assessment dated 14-20 December 2018 in collaboration with the Palm Oil Community Circle (LINKS).)
9	6.10.1.	(Periodic socialization of contracts (production sharing and ownership systems) of smallholders to ensure cooperation is fair, legal and transparent).

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

Public Issues (Institution/ NGO/Community)	Auditor Responses
<p>Interview with Customary leader, Representative of Kendawangan Kiri Village and Banjarsari Village.</p> <ul style="list-style-type: none"> • The company provides assistance to villages such as cleaning trenches, renovating houses, and improving the economy of the village community. The company also participates in preserving local culture such as providing assistance for local customary activities. • The land compensation process with the company is carried out without coercion. • There is no environmental pollution due to the company's operational activities. • Good communication with the company. • Many villagers work in PT GKG. • Villagers understand the protected area and the prohibition to hunt or preserve endangered / protected. - Villagers acknowledge charity from the company. - The charity obtained must go through a proposal. - The community hopes the empowerment program for independent smallholder development. - The community hopes the Dayak (<i>kulay</i>) culture program. - Responses to proposals are quite long (3 years) examples of trench support. - PIC / person in charge lacks coordination unlike his predecessor (P Gabriel). - The community asks for transparency regarding the distribution of plasma SHU. - There is still a portal installation by community if community aspirations are not responded. 	<p>Auditor has been verified the compliance with criteria 2.3, 5.2, 6.11.</p>
<p>Head of Worker Unions of PT GKG</p> <ul style="list-style-type: none"> - There are 502 member during last year. - The minimum wage has applicable since January 2019 in accordance to Kalimantan Barat Governor Decree. - There is no complaint from the workers during last year. - There is no complaint related to <i>BPJS Ketenagakerjaan</i> and <i>BPJS Kesehatan</i> registration. - Several workers has not been registered on the <i>BPJS Kesehatan</i>. It causes, they don't have ID yet. - There are outsourced activities, such as: weeding and EFB application activities. - There is no human right discrimination. - Company regulation is still valid with period of 2018 to 2020. - The worker union have opinion to the management to creating Collective Labor Agreement (CLA). - There is fire cases in year of 2019, the Emergency and Preparedness team can handle it. <p>Aspirations:</p>	<p>It has been verified on criteria 6.2; 6.4; and 6.5.</p>

Public Issues (Institution/ NGO/Community)	Auditor Responses
<ul style="list-style-type: none"> - The CH can realized transportation for harvester from housing to the site. - The CLA can be negotiated with the management year of 2020. 	
<p>Head of Worker Union of PT GKS</p> <ul style="list-style-type: none"> - There are 400 member during last year. - The minimum wage has applicable since January 2019 in accordance to Kalimantan Barat Governor Decree. - There is no complaint from the workers during last year. - There is no complaint related to <i>BPJS Ketenagakerjaan</i> and <i>BPJS Kesehatan</i> registration. - Several workers has not been registered on the <i>BPJS Kesehatan</i>. It causes, they don't have ID yet. - There are outsourced activities, such as: weeding and EFB application activities. - There is no human right discrimination. - Company regulation is still valid with period of 2018 to 2020. - The worker union have opinion to the management to creating Collective Labor Agreement (CLA). - There is fire cases in year of 2019, the Emergency and Preparedness team can handle it. <p>Aspirations:</p> <ul style="list-style-type: none"> - The CH can realized transportation for harvester from housing to the site. - The CLA can be negotiated with the management year of 2020. <p>The management can improve supporting for the worker union.</p>	<p>It has been verified on criteria 6.2; 6.4; and 6.5.</p>
<p>Clerk of PT GKS/Gender Committee Member</p> <ul style="list-style-type: none"> - There is no sex harassment issues during last year. - The CH has provided menstruation leave and maternity leave for all women workers. - BSS and BMS team are women workers. - There is pregnancy testing for all women pesticide applicators every month. - The Gender Committee has socialized about women right and obscenity to all workers. - The CH has provided daycare for all children. 	<p>It has been verified on criteria 6.9.</p>
<p>Admin Treasury & Accounting of PT GKG/Gender Committee Board</p> <ul style="list-style-type: none"> - There is no sex harassment issues during last year. - The CH has provided menstruation leave and maternity leave for all women workers. - BSS and BMS team are women workers. - There is pregnancy testing for all women pesticide applicators every month. - The Gender Committee has socialized about women right and obscenity to all workers. 	<p>It has been verified on criteria 6.9.</p>

Public Issues (Institution/ NGO/Community)	Auditor Responses
Partnership Division of Plantation Agency of Ketapang Regency <ul style="list-style-type: none"> - Plantation Class has been assessed in the companies. - The CH has realized scheme smallholders with full manage system. - The CH has realized profit sharing with the cooperative. - There are no land dispute during last year. - The CH has realized CSR program during last year. - The CH has reported LKUP every half of semester. - The CH are advised to realize profit sharing with the cooperation every month. 	<ul style="list-style-type: none"> - Related to Plantation Class has been verified on indicator 2.1.1. - Related to profit sharing with cooperative has been verified on criteria 6.10. <p>Related to land dispute issues had been verified on criteria 2.2 & 2.3.</p>
Industrial Relation Division of Man Power Agency of Ketapang Regency <ul style="list-style-type: none"> - The CH has obtained OHS Committee, each of secretary were licensed by Man Power Agency. - There is no industrial relation conflict during last year. - Operator License Extension direct to the Man Power Agency, the CH are advised to reporting this process to the local agency. - The CH has paid death fund due to accident work. 	<p>It has been verified on criteria 4.7.</p>
Mapping Division of National Land Agency of Ketapang Regency <ul style="list-style-type: none"> - There is no abandoned area letter from agency. - There is no land dispute issues during last year. - The CH has added area with HGU and HGB decree. <p>The CH has realized smallholder scheme with full manage system.</p>	<p>It has been verified on indicator 2.2.1.</p>
Waste and Hazardous Waste Management Division of Environment Agency of Ketapang Regency <ul style="list-style-type: none"> - The CH has extension of hazardous waste store license year of 2017. - There is no environment pollution issues during last year. - The CH has reported hazardous waste management report every half of semester. - The CH has reported EIA management and monitoring every half of semester. - The Kendawangan Mill has obtained Proper Biru certificate. 	<p>It has been verified on criteria 5.1; 5.2; and 5.3.</p>

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY
4.1	<p>Formal Sign-off of Assessment Findings</p> <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-between; align-items: flex-end;"> <div style="text-align: center;"> <p>PT Gunajaya Karya Gemilang Management Representative</p>  <p><u>Nandang Mulyana</u> Monday, 27 January 2020</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><u>Trismadi Nurbayuto</u> Monday, 27 January 2020</p> </div> </div>

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

No	Institution/NGO/Community	Address	No. Telp/e-mail	Consultation type	Date	Respond	
						Yes	No
1	Partnership Division of Plantation Agency of Ketapang Regency.	Ketapang Regency	-	Interview	5 th November 2019	✓	
2	Industrial Relation Division of Man Power Agency of Ketapang Regency	Ketapang Regency	-	Interview	5 th November 2019	✓	
3	Mapping Division of National Land Agency of Ketapang Regency	Ketapang Regency	-	Interview	5 th November 2019	✓	
4	Waste and Hazardous Waste Management Division of Environment Agency of Ketapang Regency	Ketapang Regency	-	Interview	5 th November 2019	✓	
5	Representative of Kendawangan Kiri Village	Ketapang Regency	-	Interview	5 th November 2019	✓	
6	Representative of Banjarsari Village	Ketapang Regency	-	Interview	5 th November 2019	✓	
7	Head of Worker Unions of PT GKG	PT GKG	-	Interview	5 th November 2019	✓	
8	Head of Worker Union of PT GKS	PT GKS	-	Interview	5 th November 2019	✓	
9	Clerk of PT GKS/Gender Committee Member	PT GKS	-	Interview	5 th November 2019	✓	
10	Admin treasury & accounting of PT GKG/Gender Committee Board	PT GKS	-	Interview	5 th November 2019	✓	
11	AMAN	Jakarta	rumahaman@cbn.net.id	Questionnaire through email	October, 25 th 2019		✓
12	WALHI	Jakarta	informasi@walhi.or.id	Questionnaire through email	October, 25 th 2019		✓
13	Sawit Watch	Jakarta	info@sawitwatch.or.id	Questionnaire through email	October, 25 th 2019		✓
14	Local Contractor of FFB, CV IGVAM & PT SHK.	Ketapang Regency	-	Interview	5 th November 2019	✓	
15	Banjarsari Estate Estate - 16 harvesters - 10 spraying workers - 6 manuring workers	PT GKG	-	Interview	6 th November 2019	✓	

	<ul style="list-style-type: none"> - 1 clerk and 1 head of workshop - 1 Agrochemical material warehouse worker. - 1 midwife of clinic - 10 Fire Fighting tim. - 1 Generator operator 						
14	Kendawangan Mill <ul style="list-style-type: none"> - 3 security - 3 loading ramp workers - 2 boiler man - 1 Clarification worker - 1 engine room worker - 1 kernel station worker - 1 WWTP worker 	PT GKG	-	Interview	5 th November 2019	✓	
15	Seriam Jaya Estate <ul style="list-style-type: none"> - 10 spraying workers - 10 manuring workers - 8 harvesters - 2 FFB loaders and 1 foreman - 2 pest census workers 	PT GKS			6 th November 2019	✓	
16	Sungai Tapah Estate <ul style="list-style-type: none"> - 3 harvesters - 19 spraying workers - 6 manuring workers - 2 creche worker - 1 Housing Complex Cendrawasih - 1 Generator operator - 2 Agrochemical material warehouse worker. 	PT GKS			6 th November 2019	✓	

Appendix 2. Assessment Program

Date	4 – 8 November 2019	
PROGRAM	AUDIT PROCESS	AUDITOR
Monday, 4 November 2019		
05.15 – 06.55	Jakarta → Pontianak (Garuda GA 500)	All Auditor
09.40 – 10.30	Pontianak → Ketapang (Wings Air IW 348)	All Auditor
11.00 – 12.00	Break and Lunch	All Auditor
12.30 – 15.30	Ketapang → Kendawangan (site)	All Auditor
16.00 – 17.00	Opening Meeting Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Determine of Field Visit, Transparency and Confidentiality Clarification) Review Previous NCR	All Auditor
Tuesday, 5 November 2019		
08.00 – 12.00	Field Observation to Sungai Tapah Estate <ul style="list-style-type: none"> BMP, safety, worker welfare and complaint mechanism Hazardous Waste Material (B3) management; Worker facilities (housing, health clinic, clean water, etc), Land fill, Fire fighting facilities , Storage, ect. Observation to HCV Area and Legal Boundaries Sungai Tapah Estate & Banjarsari Estate 	HRK RPN APP
	Public consultation: <ul style="list-style-type: none"> With previous land owner (if any) and local communities surrounding the plantation area. Government Agencies (by phone) Internal and external stakeholder (Cooperative, Labor Union, Gender Committee, Local Contractors, etc.) 	WYN TNB TNB
12.00 – 14.00	Break	All Auditor
14.00 – 17.00	Field Observation to Kendawangan POM <ul style="list-style-type: none"> Process Station, Safety Aspect and Worker Welfare (Grading – despatch) ETP; WTP; Hazardous Waste Warehouse; Drainage; Collecting place of fiber, Water Discharge, Hazardous Warehouse; Workshop, Chemical Store. ETP, Water Intake, Land Application Supply Chain 	APP/HRK WYN RPN TNB
Wednesday, 6 November 2019		
08.00 – 12.00	Field Observation to Banjarsari Estate <ul style="list-style-type: none"> BMP, safety, worker welfare and complaint mechanism Hazardous Waste Material (B3) management; Worker facilities (housing, health clinic, clean water, etc), Land fill, Fire fighting facilities , Storage, ect. 	TNB RPN
	Field Observation to Seriam Jaya Estate <ul style="list-style-type: none"> BMP, safety, worker welfare and complaint mechanism Hazardous Waste Material (B3) management; Worker facilities (housing, health clinic, clean water, etc), Land fill, Fire fighting facilities , Storage, ect. 	HRK WYN
	Observation to HCV Area and Legal Boundaries Seriam Jaya Estate	APP

12.00 – 14.00	Break	All Auditor
14.00 – 17.00	Document Review, Time Bound Plan and Partial Certification Review	All Auditor
Thursday, 7 November 2019		
08.00 – 12.00	Document Review & Closing meeting preparation	All Auditor
12.00 – 14.00	Break	All Auditor
14.00 – 15.00	Closing meeting preparation	All Auditor
15.00 – 16.00	Closing Meeting	All Auditor
17.00 – 20.00	Kendawangan (site) → Ketapang	All Auditor
Friday, 8 November 2019		
07.00 – 07.40	Ketapang – Pontianak (Nam Air IN-155)	All Auditor
08.20 – 09.45	Pontianak – Jakarta (Nam Air IN-181)	All Auditor