

***Roundtable on Sustainable Palm Oil Certification
RSPO***

[✓] Surveillance

Name of Management Organisation : Sungai Binti Palm Oil Mill, PT Agro Bukit subsidiary of Goodhope Asia Holdings Ltd

Plantation Name : Tanah Putih Estate, Sungai Binti Estate, Sungai Lenggana Estate and Sawahan Estate

Location : Village of Natai Baru, Sub District of Mentaya Hilir Utara, District of Kotawaringin Timur, Province of Kalimantan Tengah, Indonesia

Certificate Code : **MUTU-RSPO/082**

Date of Certificate Issue : 04 December 2015 Date of License Issue : 04 December 2019

Date of Certificate Expiry : 03 December 2020 Date of License Expiry : 03 December 2020

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA 4	05 to 09 August 2019	Moh Arif Yusni (Lead Auditor), Arif Faisal Simatupang, Radytio Puspanjana, Yudhi Yuniarto Tallutondok	Leonada	Ardiansyah

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA 4	27 November 2019

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Figure 1. Location Map of PT Agro Bukit, Kalimantan Tengah Province

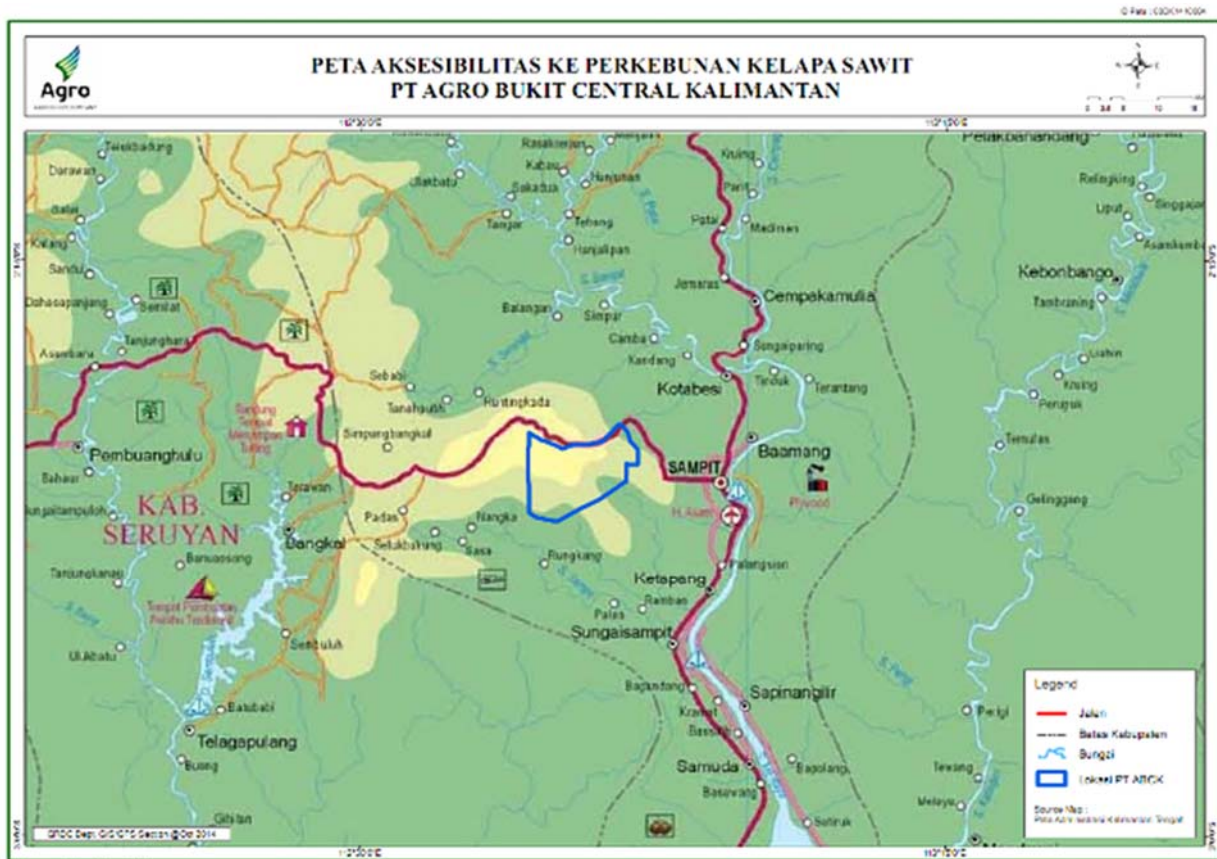
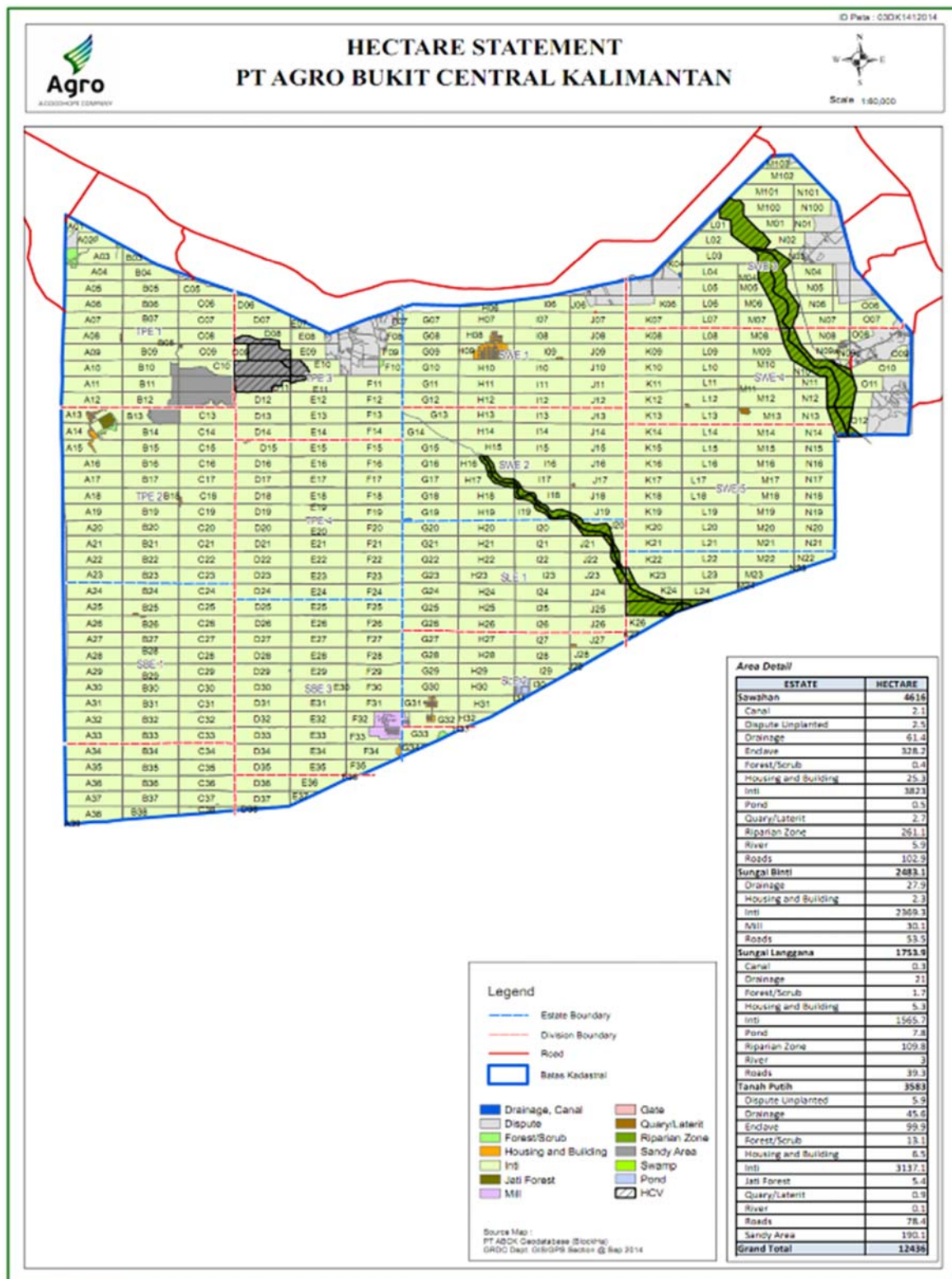


Figure 2. Operational Map of PT Agro Bukit, Natai Baru Village, Kotawaringin Timur Regency, Kalimantan Tengah Province



Abbreviations Used

ABCK	:	Agro Bukit Central Kalimantan
ASA	:	Annual Surveillance Assessment
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i> (Workers Social Security Agency)
CEO	:	Chief Executive Officer
CPO	:	Crude Palm Oil
CSR	:	Corporate Social Responsibility
EFB	:	Empty Fruit Bunch
EHS	:	Environment Health and Safety
EIA	:	Environmental Impact Assessment
FFB	:	Fresh Fruit Bunch
FPIC	:	Free Prior dan Informed Consent
GHG	:	Green House Gas
GIS	:	Geographical Information System
GMO	:	General Manager Office
GPS	:	Global Positioning System
GRIT	:	<i>Ganti Rugi Tanam Tumbuh</i> (Land compensation)
HCV	:	High Conservation Value
HGU	:	<i>Hak Guna Usaha</i> (Land Use Title)
HIRAC	:	Hazard Identification Risk Assessment and Control
HRD	:	Human Resources Department
ID	:	Identity
IDR	:	Indonesian Rupiah
IPM	:	Integrated Pest Management
JKK	:	<i>Jaminan Kecelakaan Kerja</i> (work accident insurance)
JKM	:	<i>Jaminan Kematian</i> (dead insurance)
JKS	:	<i>Jaminan Kesehatan</i> (health insurance)
JPN	:	<i>Jaminan Pensiun</i> (Retirement insurance)
KCP	:	Kernel Crushing Plant
KER	:	Kernel Extraction Rate
LOTO	:	Log Out Tag Out
LTA	:	Lost Time Accident
MR	:	Main Road
MSDS	:	Material Safety Data Sheet
OER	:	Oil Extraction Rate
OHS	:	Occupational Health and Safety
P2K3	:	<i>Panitia Pembina Keselamatan dan Kesehatan Kerja</i> (OHS Committee)
PK	:	Palm Kernel
PKO	:	Palm Kernel Oil
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PPE	:	Personal Protective Equipment
PR	:	Public Relation
RKL-RPL	:	<i>Rencana Pengelolaan Lingkungan - Rencana Pemantauan Lingkungan</i> (Environment Management Plan - Environment Monitoring Plan)
SBE	:	Sungai Binti Estate
SIA	:	Social Impact Assessment
SOP	:	Standart Operational Procedure
SWE	:	Sawah Estate

UKL-UPL	:	<i>Upaya Kelola Lingkungan / Upaya Pemantauan Lingkungan</i> (Environmental Management Efforts / Environmental Monitoring Efforts)
WB	:	Weigh Bridge
WHO	:	World Health Organization
WTP	:	Water Treatment Plant
WWTP	:	Waste Water Treatment Plant

1.0	SCOPE of the CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used	<ul style="list-style-type: none">Indonesian National Interpretation of RSPO P&C 2013 by 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 Agro Bukit subsidiary of Goodhope Asia Holdings Ltd	
1.2.2	Contact person	Saepul Bahri	
1.2.3	Organisation address and site address	<ul style="list-style-type: none">RSPO registered company: Menara Global, 5th Floor, Jl. Jend. Gatot Subroto Kav. 27 Jakarta 12950.Liaison Office: Menara Global, 5th Floor, Jl. Jend. Gatot Subroto Kav. 27 Jakarta 12950.	
1.2.4	Telephone	(+62) 21 528 92260	
1.2.5	Fax	(+62) 21 528 92259	
1.2.6	E-mail	saepulb@goodhope-id.com	
1.2.7	Web page address	www.goodhopeasia.com	
1.2.8	Management Representative who completed the application for certification	Saepul Bahri	
1.2.9	Registered as RSPO member	1-0175-14-000-00 02 December 2014	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Palm Oil Mill and supply base : <ul style="list-style-type: none">Sungai Binti Mill, Sungai Binti Estate, Sawahan Estate, Sungai Lenggana Estate and Tanah Putih Estate.	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			LatitudeLongitude
	Sungai Binti Mill	Village of Natai Baru, Sub District of Mentaya Hilir Utara, District of	S 02° 33' 48"E 112° 46' 05"

		Kotawaringin Timur; Province of Kalimantan Tengah, Indonesia				
1.4.2	Location of Certification Scope of Supply Base					
	Name of Supply Base	Location	Coordinate			
			Latitude	Longitude		
	Tanah Putih Estate	Village of Penyang, Sub District of Telawang; District of Kotawaringin Timur; Province of Kalimantan Tengah, Indonesia	S 02° 31' 05"	E 112° 44' 35"		
	Sawah Estate	Village of Pasir Putih, Sub District of Mentawa Baru Ketapang; District of Kotawaringin Timur; Province of Kalimantan Tengah, Indonesia	S 02° 30' 46"	E 112° 48' 44"		
	Sungai Lenggana Estate	Village of Bangkoang Makmur, Sub District of Mentawa Baru Ketapang; District of Kotawaringin Timur; Province of Kalimantan Tengah, Indonesia	S 02° 32' 44"	E 112° 47' 52"		
	Sungai Binti Estate	Village of Bagendang Tengah and Natai Baru, Sub District of Mentaya Hilir Utara; District of Kotawaringin Timur; Province of Kalimantan Tengah, Indonesia	S 02° 33' 50"	E 112° 44' 37"		
1.5	Description of Area Statement					
1.5.1	Tenure					
	• State		12,436.00 Ha			
	• Community		- Ha			
1.5.2	Area Statement					
	• Total area		12,436.00 Ha			
	• Mature area		10,871.40 Ha			
	• Mill		4.90 Ha			
	• Emplishment		4.40 Ha			
	• Infrastructure		500.90 Ha			
	• Others area (Kampung/public facilities)		186.90 Ha			
	• HCV		431.00 Ha			
	• Occupation		436.50 Ha			
1.6	Planting Year and Cycles					
1.6.1	Age profile of planting year					
	Planting Year	Hectarage (Ha)				
		Tanah Putih	Sawah Estate	Sungai Lenggana	Sungai Binti	Total
	2006	2,071.30	168.70	186.70	1,359.80	3,786.50
	2007	1,057.30	2,336.80	1,025.20	1,009.50	5,428.80
	2008	-	1,295.40	353.80	-	1,649.20
	2012	-	6.90	-	-	6.90
	TOTAL	3,128.60	3,807.80	1,565.70	2,369.30	10,871.40
	1.6.2	New Planting area after January 2010		Ha		

1.6.3	Planting Cycle			1 st Cycle or 2 nd Cycle			
1.7	Description of Mill and Supply Base						
1.7.1	Description of Mill						
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel	
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)
	Sungai Binti Mill	90	374,658.84	77,872.70	20.78	18,728.58	5.00
<i>*Production data source from August 2018 to July 2019</i>							
1.7.2	Description of Certification Scope of Supply Base						
	Name of Estate	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ ha/year)	Supplied to Mill	
						FFB (tonnes/year)	%
	Tanah Putih	3,653.00	3,128.60	69,131.08	22.10	69,131.08	100
	Sawahen	4,555.30	3,807.80	97,855.65	25.70	97,855.65	100
	Sungai Lenggana	1,744.60	1,565.70	36,643.07	27.73	36,643.07	100
	Sungai Binti	2,483.10	2,369.30	54,288.88	24.10	54,288.88	100
	TOTAL	12,436.00	10,871.40	257,918.68	24.54	257,918.68	100
<i>*Production data source from August 2018 to July 2019</i>							
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)	
	PT Agro Bukit (Non- Certified Area)		PT Agro Bukit	-	-	60,968.83	
	PT Agro Indomas (RSPO Non-Certified)		PT Agro Indomas	-	-	259.46	
	Kas Desa (RSPO Non-Certified)		PT Agro Bukit	-	-	408.77	
	Plasma - Rongkang Jaya Mandiri		PT Agro Bukit	-	-	2,570.16	
	Plasma - Bima Penyang Mandiri		PT Agro Bukit	-	-	1,510.23	
	Plasma-KUD Permata		PT Agro Bukit	-	-	2,329.58	
	Plasma-Banguang Makmur Lestari		PT Agro Bukit	-	-	2,095.49	
	Plasma-Sinar Mentari Pagi		PT Agro Bukit	-	-	1,586.77	
	PT HAMPARAN SUBUR MAKMUR (RSPO Non-Certified)		Independent Supplier	-	-	5,316.20	
	ARNOLD RUMAHORBO (RSPO Non-Certified)		Independent Supplier	-	-	206.37	
	PT GADING SAWIT KENCANA (RSPO Non-Certified)		Independent Supplier	-	-	142.80	
	ROY M. LUMBAN GAOL, SH (RSPO Non-Certified)		Independent Supplier	-	-	81.03	
	PT MITRA BUMI BORNEO(RSPO Non-Certified)		Independent Supplier	-	-	28,359.01	
	JOHAN (RSPO Non-Certified)		Independent Supplier	-	-	40.28	
	MIRAH SARI (RSPO Non-Certified)		Independent Supplier	-	-	238.40	
	YUSUF DONNY EKOSAPUTRA (RSPO Non-Certified)		Independent Supplier	-	-	30.07	

	ALI BOTO (RSPO Non-Certified)	Independent Supplier	-	-	1,463.13
	HARTANI (RSPO Non-Certified)	Independent Supplier	-	-	157.17
	BRENGIAT SEMBIRING (RSPO Non-Certified)	Independent Supplier	-	-	4,279.88
	POLMER J MANURUNG (RSPO Non-Certified)	Independent Supplier	-	-	1.80
	WAHYONO WAHIRIN (RSPO Non-Certified)	Independent Supplier	-	-	0.01
	INGAN MALEM BR KETAREN (RSPO Non-Certified)	Independent Supplier	-	-	2.46
	CV KARYA RUKUN SEJAHTERA (RSPO Non-Certified)	Independent Supplier	-	-	2,332.18
	SRI WIDODO ARIS SOEBAGIYO (RSPO Non-Certified)	Independent Supplier	-	-	60.31
	BAMBANG AMINARSO (RSPO Non-Certified)	Independent Supplier	-	-	6.37
	BAMBANG (RSPO Non-Certified)	Independent Supplier	-	-	64.64
	CV SINAR MENTARI (RSPO Non-Certified)	Independent Supplier	-	-	244.75
	CV RAJAWALI SURYA PALMA (RSPO Non-Certified)	Independent Supplier	-	-	1,356.05
	GUNAWAN (RSPO Non-Certified)	Independent Supplier	-	-	15.56
	PT BORNEO LANCAR ABADI (RSPO Non-Certified)	Independent Supplier	-	-	609.29
	SUGENG RAHARJO WAHYUDI (RSPO Non-Certified)	Independent Supplier	-	-	3.11
	TOTAL				116,740.16
	*Production data source from August 2018 to July 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 (MT)
	FFB Processed		299,337		257,918.68
	CPO Production		64,357		62,181.03
	Palm Kernel (PK) Production		16,164		14,461.32
1.8.2	Product selling				
	Type of selling product	Actual selling product for for last year (MT)			
	CSPO sold as RSPO certified product	5,802.65			
	CSPK sold as RSPO certified product	13,625.25			
	CSPO sold under other scheme	0			
	CSPK sold under other scheme	0			
	CSPO sold as conventional	55,269.22			
	CSPK sold as conventional	0			
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)

	Tanah Putih	3,653.00	3,128.60	77,500	24.77			
	Sawah	4,555.30	3,807.80	110,000	28.89			
	Sungai Lenggana	1,744.60	1,565.70	41,000	31.03			
	Sungai Binti	2,483.10	2,369.30	60,800	26.99			
	TOTAL	12,436.00	10,871.40	289,300	27.52			
	<i>*Projected FFB production for 04 December 2019 to 03 December 2020</i>							
1.8.4	Estimate of Certified Palm Product Claim							
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO Out put (tonnes)	Extraction (%)	Palm Kernel Out put (tonnes)	Extraction (%)	Supply Chain Module
	Sungai Binti	90	289,300	66,500	23	15,900	5.5	MB
	<i>*Projected FFB production for 04 December 2019 to 03 December 2020</i>							
1.9	Other Certifications							
	ISO 9001:2008		-					
	ISO 14001: 2004		-					
	OHSAS 18001:2007		OHSAS 18001 – 2007 (Occupational Health and Safety management System), OHS 537919 from BSI – 14 January 2020.					
	ISCC		-					
	Others		PROPER <i>Biru</i> period 2017-2018					
1.10	Time Bound Plan							
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						
	Terawan Mill (PT Agro Indomas)	2012	Terawan Estate	2012	Sub District of Danau Sembuluh, District Seruyan, Province Kalimantan Tengah	Certified		
			Teluk Ulin Estate	2012				
			Lampasa Estate	2012				
			Lampasa Plasma	2012				
			Rim Capital Estate (PT Rim Capital)	2015	Sub District of Hanau and Danau Sembuluh, District of Kotawaringin Timur, Province Kalimantan Tengah	Certified		
	Sungai Purun Mill (PT Agro Indomas)	2012	Sungai Rungau Estate	2012	Sub District of Danau Sembuluh District Seruyan, Province Kalimantan Tengah	Certified		
			Sungai Purun Estate	2012				
			Terawan Plasma	2012				
			Bengkal Plasma	2012				

	Sungai Binti Mill (PT Agro Bukit)	2015	Sungai Binti Estate	2015	Sub District Mentaya Hilir Utara, District of Kotawaringin Timur, Province Kalimantan Tengah	Certified
			Sawahan Estate	2015		
			Sungai Lenggana Estate	2015		
			Tanah Putih Estate	2015		
			PT Agro Bukit (2) Extension	2020	Sub District Mentaya Hilir Utara, District of Kotawaringin Timur, Province Kalimantan Tengah	-
	Bukit Santuai Mill (PT Agro Wana Lestari)	2015	Penyahuan Estate	2015	Sub District of Mentaya Hulu and Bukit Santuai, District of Kotawaringin Timur, Province Kalimantan Tengah	Certified
			Tanah Haluan Estate	2015		
			Keminting Estate	2015		
			Sangai Estate	2015		
			Tewehara Estate	2020	Sub District of Mentaya Hulu and Bukit Santuai, District of Kotawaringin Timur, Province Kalimantan Tengah	Waiting for Land Title Permit (HGU)
			Purang Estate (PT Karya Makmur Sejahtera)	2020		
	Bumi Jaya Mill (PT Agro Indomas)	2020	Sepaku Estate (PT Agro Indomas)	2020	Sub District Sepaku, District of Penajam Paser Utara, Province Kalimantan Timur	Waiting for Land Title Permit (HGU)
	-	-	Agro Bakti Estate (PT Agra Jaya Baktitama)	2020	District of Ketapang, Province Kalimantan Barat	Mill is not constructed yet. Changed from 2018 into 2021
			Agro Jaya estate (PT Agra Jaya Baktitama)	2020		
	-	-	Prima Khatulistiwa Estate (PT Sumber Hasil Prima)	2020	District of Sintang, Province Kalimantan Barat	Mill is not constructed yet. Changed from 2017 to 2021
			Prima Sejahtera Estate (PT Sumber Hasil Prima)	2020		
	-	-	Agro Sejahtera Estate (PT Batu Mas Sejahtera)	2020	District of Ketapang, Province Kalimantan Barat	Mill is not constructed yet. Changed from 2018 into 2020
	-	-	Sinar Jaya Estate (PT Sinar Sawit Andalan)	2020	District of Sintang, Province Kalimantan Barat	Mill is not constructed yet Change

						from 2018 to 2022
		Sinar Lestari Estate, (PT Sinar Sawit Andalan)	2020			
		Sinar Makmur Estate (PT Sinar Sawit Andalan)	2020			
		Agro Lestari Estate (PT Sawit Makmur Sejahtera)	2020	District of Ketapang, Province Kalimantan Barat		Mill is not constructed yet. Changed from 2018 into 2022
-	-	Agro Makmur Estate (PT Sawit Makmur Sejahtera)	2020			
-	-	Bukit Nuhgogage Estate (PT Nabire Baru)	2020	District of Nabire, Province Papua Barat		The mill will be commissioned in the year 2018
		Cendrawasih Estate (PT Nabire Baru)	2020			
		Sungai Wami estate (PT Nabire Baru)	2020			
		Kali Bambu Estate (PT Nabire Baru)	2020			
		Kasuari Estate (PT Nabire Baru)	2020			
-	-	Keramat Ruija Estate (PT Sariwana Adi Perkasa)	2020	District of Nabire, Province Papua Barat		Will be a supply chain to PT Nabire Baru Mill
		Sima Estate (PT Sariwana Adi Perkasa)	2020			
-	-	PT Agro Bina Lestari	2022	District of Sintang, Province Kalimantan Barat		currently still under development
-	-	PT Agro Surya Mandiri	2023	District of Sintang, Province Kalimantan Barat		currently still under development
	<i>*TBP updated August 2019 and signed by Director of Sustainability</i>					
1.10.2	Progress of Associated Smallholders and Outgrowers for Certifiable Standard					
	Assosiated smallholder has been develop in 2019					

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-4	<p>1. Moh Arif Yusni (Lead Auditor). Indonesian citizen. Bachelor of Agriculture, majoring in Plant Protection. Has experience as an operational staff at a private oil palm plantation company in Indonesia on 2010 to 2012. Has attended several trainings, i.e.: ISO 19011, ISO 9001; ISO 14001, SA 8000, RSPO lead auditor, ISPO lead auditor, OHS expert, OHS auditor based on National Government No. 50/2012, SCCS, etc. Has conducting ISPO, RSPO and MSPO audit as an auditor and lead auditor with expertise on best management practices for estate and mill, legality, worker welfare, safety, social, environment, conservation, transparency, long term economic management plan and supply chain for palm oil mill aspects. During the audit, he is verify related legal aspect, Social and FPIC</p> <p>2. Arif Faisal Simatupang (Auditor). Bachelor of Agriculture, from Department of Agriculture Agronomy, Faculty of Agriculture, University of Gadjah Mada. He has successfully completed an RSPO endorsed P&C Lead Auditor Training, RSPO SCCS endorsed Lead Auditor Training, Indonesian Sustainable Palm Oil (ISPO) Lead Auditor Training, Management System Certification ISO 9001-2008 Lead Auditor Training, Environmental Management System ISO 14001 Lead Auditor Training, ISO 17021 and ISO 17065 Awareness Training, Management of High Conservation Value (HCV) Training, Social Accountability SA 8000 Training. He has four years of working experience as a Field Assistant on oil palm Plantation Company in Indonesia. Since 2014, he works as an auditor of RSPO and ISPO in the aspects of legal, social, best management practices of mill and estate, OHS, employment, and environmental. In this audit he is responsible for assessing the aspects of best practices for mill and estate, SCCS, long term business plan and transparency.</p> <p>3. 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 Lead Auditor Course by Checkmark Training. Since 2015 has been following many audit as auditor base on Best Management Practice and Environment. Aspect audit: Environment, HCV, GHG.</p> <p>4. Yudhi Yuniarto Tallutondok (Auditor). Indonesian citizen, Bachelor of Fisheries, Padjadjaran University. Have experience of working over three years since 2013 as plantation operations staff in private palm oil plantation companies in Indonesia. Training have been followed including Auditor of Indonesian Sustainable Palm Oil (ISPO), Lead Auditor of Roundtable on Sustainable Palm Oil (RSPO) P&C, Lead Auditor of ISO 9001:2015, ISO 14001:2015, ISO 22000:2009, ISO 19011:2011, Social Accountability 8000, Basic Management Development Program Agronomy, Fire Anticipation on Land and Forest, Potential Mapping and Conflict Resolution in Production Forests, Awareness ISO 17021 and ISO 17065. Has participated in audit activities for the ISPO and RSPO scheme since 2017 for agronomy, OHS, and worker welfare. In this audit he is responsible for assessing the aspects OHS, and worker welfare</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
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 4 at site :20 Working days</p>
2.2.2	Assessment Process
ASA-4	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Agro Bukit 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).</p> <p>The audit program is included as Appendix II. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared</p>

conservation areas and local communities.

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.

Team of auditor started their trip from Jakarta to Sampit and continued to site. Once arrived in Sampit, team auditor split into two team. The first team conducted public consultation with government institution in Sampit and the second team conducted Opening Meeting in the Meeting Room of PT Agro Bukit. Opening meeting was attended by General Manager, Estate Manager, the Assistant, the Head of Administration, Sustainability staff and the other related personnel.

Public Stakeholder Notification was made on July 22, 2019 in Mutu Website and No written negative feedback receive. Stakeholder consultation involved internal and external stakeholders.

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings. The comments made by external stakeholders were also taken into account in the assessment

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal meetings at their housing. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Appendix III.

Commonly, the audit activities went smoothly with good support from the unit management. The presentation of documents is presented quite well by involving related personnel. Closing Meeting conducted the Meeting Room of PT Agro Bukit and its attended by General Manager, Estate Manager, the Assistant, the Head of Administration, Sustainability staff and the other related personnel.

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 (RC) 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 4**

The assessment program please find Appendix 2

2.2.3	Locations of Assessment
ASA-4	<p>The sampling location consider the issue arose from the review documents and stakeholder's consultation that are fundamental and crucial. On this assessment sample locations that visited and respondent that interviewed by team auditor are:</p> <p>Sungai Binti Mill</p> <ul style="list-style-type: none"> • Weighbridge Station. Observation of supply chain procedure, worker welfare and safety. • Chemical Storage. Interview with officer, observation about warehouse condition, safety aspect, worker welfare, emergency preparedness and procedure. • Spear part Storage. Interview with officer, observation about warehouse condition, safety aspect, worker welfare, emergency preparedness and procedure. • WTP. Observations and interviews related to water management, recording of water use, health checks, PPE and waste management.

- **Reservoir.** Observation about reservoir, OHS implementation, and water pump room.
- **WWTP.** Field observations related to Ban to entry to WWTP, run off, testing of effluent and recording of effluent debit effluent.
- **Mill drainage.** Observation and interview related mill drainage.
- **Solid Waste.** Observation of the management of Solid waste consist of EFB, fiber and shell from the production process of mill.
- **Sterilizer Station.** Observation and interviews with sterilizer operator related employment aspect, OHS aspect and working procedures specified.
- **Press, Kernel, Clarification Stations.** Observation and interviews with operator Press regarding employment aspect, OHS aspect and working procedures specified.
- **Power House Station.** Observation and interviews with power house station operator regarding employment aspect, OHS aspect and working procedures specified.
- **Boiler Station.** Observation and interviews with Boiler operator regarding employment aspect, OHS aspect and working procedures specified.

Sungai Binti Estate

- **POME Land Application and monitoring well, Block D31 and E34.** Observation on waste water management and nutrient cycle strategy, as well as soil water quality monitoring.
- **Subsidence Stake, Block B36.** Observation of peat subsidence monitoring by installing subidence stake.
- **Piezometer, water level meter, and bund off/stop off, Block B36.** Observation of water management on peat soil by installing piezometer, water level meter, and bund off.
- **Boundaries poles and land demarcation No. 60, No 62 and No 63.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **Uncertified Area Block A38; C38; D38.** Observation related uncertified area, FFB separated and land disputes potency.
- **Clinic.** Observation and interviews related medical facilities and management of infectious hazardous waste.
- **Fertilizer storage.** Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used.
- **Pesticide storage.** Observation related to management of oil and agrochemical material and waste, MSDS, emergency response facilities and the types of pesticides used.

Sawahan Estate

- **Subsidence Stake, Block L20.** Observation of peat subsidence monitoring by installing subidence stake.
- **Piezometer, water level meter, and bund off/stop off, Block J22.** Observation of water management on peat soil by installing piezometer, water level meter, and bund off.
- **Oil palm mounding on peat area, Block J31.** Observation of leaning oil palm treatment on peat soil by mounding the circle.
- **Boundaries poles and land demarcation No. 1, No 2 and No 3.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **HCV Area (Lenggana River Riparian), Block M07/08.** Observation fo HCV management
- **Enclave Area, Block J06.** Observation related enclave area, land dispute potency and preventive action.
- **Water Catchment area,** observation related water catchment area.
- **Looses Fruit Activity Block M16 Division M16,** Observation and interviews with foremen and loose fruits pickers related to work procedures, health insurance and labor protection, safe working practices and use of PPE.
- **Circle and Path Spraying, Block I15 Division 2,** Observation and interview of workers related to herbicide spraying activities starting from technical work, employment, OHS and impacts on the environment.
- **EFB Application Block I10 Division 2**
- **Harvesting activity, Block I9 Division 2,** Observation and interviews with foremen and harvest workers related to work procedures, health insurance and labor protection, safe working practices and use of PPE.
- **Fertilizer storage.** Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used.
- **Fuel Diesel tank.** Observation of OHS, environment aspect, emergency response and fire facilities.

- **Pesticide storage.** Observation related to management of oil and agrochemical material and waste, MSDS, emergency response facilities and the types of pesticides used.
- **Workshop.** Observations and interviews related to wages and overtime, waste management activities, OHS implementations and health inspections.
- **Fire Fighting Equipment Storage and Simulation.** Simulation the function of fire extinguishers and team readiness.
- **Clinic.** Observation related medical facilities.
- **Daycare.** Observations and interviews related to the facilities provided to workers such as employee housing, clean water, daycares, school, employment and interview related complaint mechanism.
- **Body shower of spraying team and mixing area.** Observation the conditions body shower room, sprayer storage and PPE handling.
- **Housing Complex.** Observation and interview with residents about housing facilities, domestic waste management, and complaint mechanism.
- **FFB Harvesting, Block C27.** Observation and interviews with harvester related employment aspect, OHS aspect and working procedures specified.
- **Spraying Circle and Path, Block A26.** Observation and interview with supervisor and applicators related to safe working practices, OHS and worker welfare aspects.
- **EFB Application, Block C30.** Observation and interview with supervisor and applicators related to safe working practices, OHS and worker welfare aspects.

Sungai Lenggana Estate

- **Boundaries poles and land demarcation No. 65, No 66 and No 67.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **Uncertified Area Block G33; H31; J29.** Observation related uncertified area, FFB separated and land disputes potency.
- **Block K25.** Observation the implementation of management in HCV area figure Riparian of Lenggana River.
- **Block H29 Division 1 (pesticide spraying).** Observation on safe working practices and interview with the spraying workers related type of pesticides use according to the procedure and also worker welfare.
- **Block G23 Division 1 (Harvester).** Observation of procedure application related fruit ripeness, safe working practices and interview about worker welfare.
- **Block G28 Division 1.** Observation of upkeep operational, safe working practices and interview about worker welfare.
- **Block K29 Division 4.** Observation of upkeep operational, safe working practices and interview about worker welfare.
- **Block K28 Division 4.** Observation of road maintenance program.
- **Block K26 Division 4 (Harvester).** Observation of procedure application related fruit ripeness, safe working practices and interview about worker welfare.
- **Block G28 Division 1.** Observation of procedure related EFB application, safe working practices and interview about worker welfare.

Tanah Putih Estate

- **Domestic Waste Lanfill, Block B10.** Observation on domestic waste management by landfill application, distance from housing.
- **Marginal soil – hardpan, Block B10 and C10.** Observation on management of hardpan (marginal soil) area that can be planted by excavating and breaking the hardpan, and area that can not be planted for conservation.
- **Boundaries poles and land demarcation No. 5, No 46 and No 06.** Observation of aspect of land demarcation and maintenance of HGU pole, and land dispute potency.
- **HCV Forest Area (Hutan Kerangas), Block D19.** Observation the implementation of management in HCV of forest area.
- **Enclave Area, Block E10.** Observation related enclave area, land dispute potency and preventive action.
- **Body shower of spraying team and mixing area.** Observation the conditions body shower room, sprayer storage and PPE handling.
- **Housing Complex.** Observation and interview with residents about housing facilities, domestic waste

	<p>management, and complaint mechanism.</p> <ul style="list-style-type: none"> • FFB Harvesting, Block C14, Division 2. Observation and interviews with harvester related employment aspect, OHS aspect and working procedures specified. • Spraying Circle and Path, Block D18/19. Observation and interview with supervisor and applicators related to safe working practices, OHS and worker welfare aspects. • Census of Pest and Disease, Block C09. Observations and interviews related to the mechanism of pest census until post census handling <p>Consulted Stakeholder</p> <ul style="list-style-type: none"> • Previous land owner and elder of Penyang Village • Previous land owner and elder of Pasir Putih Village • Plasma Cooperative Head of Sinar Mentari Pagi • Village Head of Pasir Putih • Village Head of Bagendang Tengah • Gender Committee of PT Agro Bukit • CV SAP - Local Contractor of FFB and EFB transport from Pasir Putih Village • Environmental Agency of Kotawaringin Regency • Labor and Transmigration Agency of Kotawaringin Timur Regency, Central Kalimantan • Agriculture Agency of Kotawaringin Timur Regency, Central Kalimantan • Nusa Lima Employee Cooperatives • Labour Union Of PT Agro Bukit (Konfederasi Serikat Buruh Seluruh Indonesia)
2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ASA-4	<p>Summary of stakeholder consultation process</p> <p>Consultation of stakeholders for PT. Agro Bukit was held by:</p> <ul style="list-style-type: none"> • Public Notification on website www.mutucertification.com on July 22, 2019. • Public consultation meeting with government institution of Kotawaringin Timur Regency on August 5, 2019. • Public consultation meeting with communities including previous land owner on August 6, 2019. • Public consultation meeting with internal stakeholders and contractor on August 6, 2019. • Consultation with NGO (Yayorin Kalteng, Walhi Kalteng, Borneo Nature Foundation, Save Our Borneo, Lestari Hutanku) on July 26th 2019.
2.3.2	Stakeholder contacted
	Please find appendix 1
2.4	Determining Next Assessment
	The next visit (RC) will be determined eight to twelve month after the date of license period.

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Sungai Binti POM – PT Agro Bukit, Goodhope Asia Holdings Ltd operation consisting of one (1) mill and four (4) 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 there is non-conformances against supply chain requirement for CPO mill and six (6) opportunities for improvement were identified.

Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5. The company has already prepared and implemented the corrective action(s) that had been reviewed and accepted by Auditors in form of documentation evidences e.g. (document record/photographic/etc.). Those corrective actions taken that consist of three (3) Major non-conformities and two (2) Minor non-conformities had been closed out shall be verified during next assessment.

MUTUAGUNG LESTARI found that Sungai Binti POM – PT Agro Bukit, Goodhope Asia Holdings Ltd with 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 RSPO Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors June 2017 (Module E for CPO Mill).

Therefore MUTUAGUNG LESTARI Recommend 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 CH shown list of information related criterion 1.2 that can be accessed by relevant stakeholders, as well as the mechanism to request and responses, within SOP of Information Request dated 1st February 2016, that are Area Land Clearing, mature / immature area, Infrastructure List, IUP, AMDAL, Land Use Certificate, OHS Plan, Plan and Review of Environmental and Social Impact Assessments, HCV, Pollution Reduction and Prevention Plans, etc.</p> <p>The entire request of information (verbal and written) is recorded and kept in the logbook which is available in all units both of estates and mill, there was no request for information, but recorded several incoming letters which were entirely the proposals of aid that has been responded by the company. In addition, sighted the evidences that all mandatory report delivery to relevant agencies, among others : report of environmental management and monitoring, report of employment, waste management and plantation report.</p> <p>Based on interviews with government agencies, local communities, plasma cooperative of Sinar Mentari Pagi, local contractors and internal stakeholder known that the company has responded to every information request as long as each request is submitted in accordance with the procedure and the requested type of information is publicly available information. However, the list of documents that can be accessed by the public has not covered information such as operational reports and plasma payment of income (including details of debt). This becomes an opportunity for improvement for CH to include those pieces of information in the list of information that can be accessed by stakeholder</p>	

(OFI).

1.1.2

The person in charge for communication and consultation is General Manager, Management Representative, Head of EHS, CSR, HR, Purchasing Department, Manager, Staff, and worker. The information request from stakeholders is recorded in Logbook of Communication and Request of Information (EMS-F07). Based on consultation with related stakeholder, it is known that the procedure of communication and consultation has been communicated to the stakeholders. Stakeholders already known the communication PIC, and no obstacles in dealing with the company.

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

Certificate Holder has list of document that can be accessed publicly listed in Procedure of Communication, Participation, and Consultation (IMS.P-05). The public documents, such as legal document, environmental documents (environmental policy, environmental management and monitoring report, etc.), social document, OHS policy and program, and manpower documents. These documents are available in Estate and Mill office.

CH also has 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. Based on interviews with government agencies, local communities, plasma cooperative of Sinar Mentari Pagi, local contractors and internal stakeholder known that the stakeholders already known the information that can be accessed in accordance with the authority.

Status: Comply

1.3

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

1.3.1

CH has code of conduct document for all operational activities written on Goodhope Asia Holdings Limited Business Conduct Standards. The policy explains fair business practices, prohibitions of corruption, bribery, fraud in the use of funds and resources and information disclosure in accordance with applicable regulations. This policy is available in Indonesian Language. Based on interview with worker in Estate and Mill, contractor, plasma official, it is known that they understand about the code of conduct. Code of conduct policy also seen in work agreement with local contractor. Also based on interview with local contractor of PK, EFB, and FFB Transporter, and FFB supplier, it is known that the contractor is knew and understand about code of conduct.

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

Legality

The company has a business permit with Number: 525.26 / 222 / IV / EKBANG / 2005 dated April 29, 2005 with a total area of 13,930 Ha. This is in accordance with Minister of Agriculture Regulation No. 98 years 2013.

BMP of Agronomy

In the aspect of agronomy, the CH has had justifications that the pesticides used were registered in Pesticide Commission, Ministry of Agriculture. The pesticides also used based on the list on Pesticides Recommendation (No. 560.566/177/WAS.KK/V/2019) from Labor Agency of Kotawaringin Timur Regency.

Environment

- The Regent of East Kotawaringin Decree Number: 03 / Commission-Kotim / VIII / 2006 dated August 7th, 2006

concerning the Environmental Feasibility of Oil Palm Plantations and Processing Plants by PT Agro Bukit in East Kotawaringin Regency, Central Kalimantan Province.

- Has been manage the hazardous waste and domestic waste in accordance with applicable government regulations number 101 year 2014.
- Land preparation without burning and has the infrastructure in fire anticipation, according to Permentan Number. 26 of 2007 section 15.
- Regarding the validity period of the Land Application permit, has ended until April 30, 2019 the company shows the document of extension process, namely, the Minutes of the review / verification of land application study May 14, 2019 by environmental agency. The company has the opportunity to follow up the land application permit process.

OFI**Employment**

The Company has implemented the Central Kalimantan Governor Decree No. 51 Of 2018 concerning the Establishment of the Central Kalimantan Province Minimum Wage in 2019 which stipulates the minimum wage amounting to IDR 2,776,460 per month for work hours of seven hours a day and forty hours of work a week.

OHS

- The company has undertaken prevention and control measures as listed in Safety Act no. 1 of 1970 Article 3, among others by monitoring the implementation of occupational safety and health, conducting accident investigations, hazard risk analysis, medical checkup, machine operation by persons authorized and socialized safe work practices. Based on the results of document review and interviews with factory workers, for example at boiler stations, it is known that boiler operators have licenses to operate boilers in accordance with Minister of Manpower Regulation No. 1 of 1988.
- Based on document verification and field visit was known that the company has comply with article 3 of Safety Act No. 1 of 1970 such as providing PPE (ear muf) to employee at engine room, and monitoring air quality every six month (dust, noise level, etc.).
- The Company has an Emergency Response Preparedness Team which is responsible for preventing and controlling fires. The firefighting team is ensured to have the ability to handle emergency conditions because they have been trained and routinely carry out fire extinguishing simulations every year. In addition, the CH also has an OHS Expert who is also responsible for the emergency events in each unit.
- All vehicle units owned by the company already have operational permits from the local government and annual routine testing has been carried out which explains that all tools are in good condition and ready for use
- All tractor operators have been trained and licensed.
- Based on the results of field observations, it is known that all tractors that operate and are used for evacuation have anti roll bars

The results of document review, interviews with relevant agency (Environment Agency) and Labor union representatives conveyed that the company had complied with local and national environment regulations.

2.1.2 and 2.1.3

The CH has a mechanism to assess compliance with the law and regulation, in accordance with the Legal Requirements Procedure (No. IMS.P-02 dated 4 May 2015), starting with inventorying and make a list of the applicable rules. The list updated annually by EHS Department through Intenal Audit of Regulation Compliance. CH have shown List of Regulation updated 2019 that arranged by Internal Audit of Compliance, covered the aspects of employment, environment, HCV, OHS, and legality of land use. Those list were include of regional, national, and ratified international regulations.

2.1.4

The company has a list of legal requirements contained in the Evaluation of Legal and other Requirement Compliance. There are a total of 247 regulations with all of them fulfilled in accordance with the evaluation of the regulations. However, based on the verification of the document, there are still regulations that have not been included in the list of company regulations, for example but not limited to:

- Minister of Manpower Regulations No 6 of 2016 concerning Holiday Allowance.
- Minister of Manpower Regulations No. 1 of 2017 concerning Wage Structure and Scale.
- Minister of Manpower Regulations No. 15 of 2018 concerning Minimum Wages.

- Minister of Manpower Regulations No. 4 of 2019 concerning Obligatory Procedures for Reporting Employment in the Network.
- Minister of Environment and Forestry Regulation No. P.8/MENLHK/SETJEN/KUM.I/3/2018 concerning the Fixed Procedure for Field Checking Hotspots Information and / or Forest and Land Fires Information.
- Minister of Environment and Forestry Regulation No. P.9/MENLHK/SETJEN/KUM.I/3/2018 concerning Technical Criteria for Preparedness and Emergency Status of Forest and Land Fires.
- Minister of Environment and Forestry Regulation No. P.21/MENLHK/SETJEN/KUM.I/7/2018 concerning Amendment to Minister of Environment and Forestry Regulation No. 5 of 2014 concerning Wastewater Quality Standards.

Based on that's explanation raised non conformity No 2019.01 with Minor Category

2.1.4	Status: NCR 2019.01 with Minor Category
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2.2

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

2.2.1

PT Agro Bukit managed area covering 15,315 Ha, with the scope of certification area of PT Agro Bukit are 12,436 Ha. The area of certification based on *Peta Kadastral on 30 May 2006*. From the certification area there is 2,086.4 Ha has been obtained land title (HGU No 1 Year of 2019) and the rest of the area still process due to constrained due to forest status. When audit ASA 4 conducted the last update about release forest area is can presented official memo No ND.74/PKTL/KUH/PLA.2/7/2019, June 2019, from Director General of Forestry and Environmental Planning to the Minister of Environment and Forestry, about recommendation related release forest area that can be processed. Based on the explanation of the progress to obtain the land title its became OFI and will be verified on the next assessment

2.2.2

There were no changes to the SOP of Demarcation and Boundary Pole Maintenance, (SOP No. Legal Boundary Management. GPS 1.1 dated July 15, 2016). The company has demonstrated the implementation of the procedure by showing the documentation of the Monitoring of Boundary Poles Conditions last carried out in September 2018. In addition, the company also showed a 1: 55,000 scale Boundary Poles Map with a total of 56 boundary poles.

Based on field visits in the Sungai Lenggana Estate No. 65, No 66 and No 67; Sungai Binti Estate No. 60, No 62 and No 63; Sawahan Estate No. 1, No 2 and No 3 and Tanah Putih Estate No. 5, No 46 and No 06, it is known that there are boundary poles according to the coordinates and maintain routinely.

2.2.3, 2.2.4, 2.2.5

There is no change from previous assessments related Procedures land conflict resolution or land acquisition that mentioned in Land Measurement for land compensation (3.1 dated 22 September 2016). In that's mechanism described activity & responsibility chart that covers Survey & identify the land ownership and land compensation recapitulation.

Based on field visits and interviews elderly in (including previous land owner) obtained information if currently there is no issue related land tenurial or land disputes between the company and other parties. The whole planted area by the company has been compensated. The compensation process involved all community witnessed also by the Village Head, Sub district head and others relevant parties. Records of land compensation process consist of: document of land identification and inventory, land location maps, statement of release of land rights by owner, Receipt of Payment, Minutes of compensation/Compensation and witnesses. This is stored in their respective estate according to the location of the land. Until the audit was carried out, there was no written complaint from the community regarding the land dispute

However, based areal statement documents, interview with managements and stakeholder its known there is area covering ± 623.40 Ha that occupied by community due to the land owner not willing to be compensated. Based on field observation in occupied area in, it's known if the area are community settlement (Kampong). Moreover field observation in Tanah Putih Estate and Sawahan Estate the area is rubber and oil palm crops owned by community. For areas that are currently still controlled by the community (occupational area) and have never been compensated the company respects the existence and didn't forced to give the land to the company. The area was clearly bounded by roads and ditches.

Even though the area of PT Agro Bukit from forest concession company, the company has been carrying land

compensation to the affected parties. The land compensation was carried out since 2005 - 2013 with the total area ± 30,891.40 Ha. The CH has shown that land acquisition has been done through by negotiation.

2.2.6

The policy regarding the prohibition on paramilitary use is still the same as the previous assessment contained in the plantation operational security policy dated 10 April 2015, signed by the Director of Sustainability.

Based on field visits and interviews with surrounding communities, it is known that there was no intimidation or use of mercenaries in maintaining peace and order in the company's area.

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 were no changes to the FPIC SOP contained in the SOP.EHS.NPP-01 dated March 30, 2016 concerning the New Land Development Preparation Procedure.

However, based areal statement documents, interview with managements and stakeholder its known there is area covering ± 623.40 Ha that occupied by community due to the land owner not willing to be compensated. Based on field observation in occupied area in, it's known if the area are community settlement (Kampong). Moreover field observation in Tanah Putih Estate and Sawahan Estate the area is rubber and oil palm crops owned by community. For areas that are currently still controlled by the community (occupational area) and have never been compensated the company respects the existence and didn't forced to give the land to the company. The area was clearly bounded by roads and ditches.

Even though the area of PT Agro Bukit from forest concession company, the company has been carrying land compensation to the affected parties. The land compensation was carried out since 2005 - 2013 with the total area ± 30,891.40 Ha. The CH has shown that land acquisition has been done through by negotiation. Based on field visits and interviews elderly in (including previous land owner) obtained information if currently there is no issue related land tenurial or land disputes between the company and other parties. The whole area that managed by the company has been compensated. The compensation process involved all community witnessed also by the Village Head, Sub district head and others relevant parties. Records of land compensation process consist of: document of land identification and inventory, land location maps, statement of release of land rights by owner, Receipt of Payment, Minutes of compensation/Compensation and witnesses. This is stored in their respective estate according to the location of the land. Until the audit was carried out, there was no written complaint from the community regarding the land dispute or FPIC process.

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 CH has had long-term business plan for the period of 2019/2020, 2020/2021, 2021/2022, covered management plan data such as the statement area (mature area, immature area, land clearing, arable land, reserve area, road, drainage, housing, peat management/subsidence issues, and others). In addition, there are also projections related to harvesting budget, maintenance, fertilization, general costs, mill process costs, FFB sales, oil revenue (Rp) and kernel revenue (Rp).

The CH has shown the document of the monthly management meeting of PT Agro Bukit, which reviews the evaluation of achievement compared to the specified budget. In addition, the company also routinely conducts annual meetings that are useful as a reference for the coming year.

In the end of 2018, the CH has been develop scheme smallholder (plasma) with the total area 1,555.5 Ha that involved five village and five plasma cooperatives. However the variable related the plasma has not been included in long term

plan yet. This become opportunity for improvement related following up on the preparation of financial indicators (estimating prices, costs) for scheme smallholder **(OFI)**.

Based on the document year planting of PT Agro Bukit and interview with management, it is known that the oldest age of oil palm plants is 14 years. Regarding this, the company does not have a replanting program.

Status: Comply

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

4.1

Operating procedures are appropriately documented and consistently implemented and monitored.

4.1.1

The SOP for plantations has been demonstrated by the Agronomy Team in the Agronomy Policies Document which was approved by Director of Agronomy. The document consists of 26 Chapter which contains, among others, nursery techniques, road systems, water management, planting density, soil conservation and terracing, LCC, planting technique and etc.

In addition, the company has shown that the SOP of the Factory has also been shown to have been approved by the Director of Engineering (Mill). The mill has 21 procedures which covers acceptance on the mill activity, FFB grading, processing techniques on every stations and dispatch.

Based on observations and interviews with workers at Mill and Estate, it is known that these procedures are well implemented in the field, workers can explain and demonstrate their work in accordance with the procedure.

4.1.2, 4.1.3

Certificate holder conducted several methods to monitor the implementation of procedures. Among others conducted annually operational and RSPO internal audit in order to monitor the implementation of the procedures. Operational internal audit evaluate the implementation of operational and administration of estates and mill. Whereas RSPO internal audit evaluate the implementation of sustainability procedures in estates and mill. Furthermore, the management representative (Assistant, Manager, and related Superiors) routinely conduct inspectorate visit to control the implementation of the procedures. The record of monitoring has been documented, for instance internal audit of RSPO was carried out in the period of 25 February to 2 March 2019, and 22 to 26 July 2019. All nonconformity has been followed up and fulfilled by each management unit.

4.1.4

The company has shown procedures related to FFB suppliers, including SOP of Receiving FFB (Doc No.: 000 / SOP / ABCK-14, dated September 1, 2014). The purpose of this procedure is to ensure that every FFB that will enter Mill is not FFB resulting from theft. FFB originating from outside inside must be checked at the portal 26 checkpoint (the initial post to enter the estate).

The company has shown a list of FFB suppliers. There are 29 suppliers of FFB suppliers for PT Agro Bukit. Furthermore, the certificate holder has also recapitulated FFB receipts conducted on a daily, weekly and monthly basis.

Status: Comply

4.2

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

4.2.1; 4.2.2

The CH has had Good Agricultural Practices (GAP) procedure in managing soil fertility, including water management, legume cover crops, manuring, fertilizer sampling for quality control analysis, leaf and rachis sampling. Records of fertilization has been shown in the document of Summary Fertilizer Recommendation & Application Schedule of 2018/2019, which includes the program and realization of fertilization. Based on document review in each Estate, it shows that the manuring activity (time, location, dose, amount) has been in accordance with the recommendation. The anorganic fertilizer used by CH were Urea, TSP, MOP, Borate, Dolomite, CuSO₄, ZnSO₄.

Overall, the certificate holder has made efforts to maintain and improve soil fertility. Visually, there is no symptom of nutrient deficiency at the blocks that have been visited. Based on production data from 12 months before assessment (Aug 2018 - Jul 2019), showing reasonable productivity, that is average 24 ton/ha/year for PT Agro Bukit.

4.2.3

The CH has had SOP of Land and Leaf Sampling (No. OP/C16/11/12/03). The procedure stated that leaf analysis is carried out periodically every year and soil analysis is carried out every ten years. The results of the analysis are then used as a basis for calculating annual fertilizer recommendations.

The company has recordings related to soil sampling, leaves and visual supervision listed in the Soil and Leaves Analysis Test Report. The results of leaf sampling for the Sungai Binti Estate, Sawahan Estate, Sungai Lenggana Estate and Tanah Putih Estate were tested for parameters including levels of Nitrogen, Phosphate, Potassium, Magnesium, Calcium, Borate, Copper, Zinc, pH, organic C, total N, C / N Ratio, P2O5 levels and Kation Exchange Capacity. The last soil sampling was carried out on 18 September 2017, while the last leaf sampling was carried out on 13 July 2019.

4.2.4

Nutrient recycling strategy as a part for increasing soil fertility has been conducted, such as EFB mulching application and POME land application. Field observation in Sawahan and Sungai Lenggana Estate, it is known that EFB mulching application has been implemented especially in sandy area with dosage 40 tonnes/ha/year. Whereas in Sungai Binti Estate, POME land application with dose 750 tonnes/ha/year in three rotation (250 tonnes/ha/rotation) has been implemented. The record off EFB and POME application has been well documented.

Status: Comply

4.3

Practices minimize and control erosion and degradation of soils.

4.3.1

The CH shown a map that informs the land conditions and characteristics of the land at PT Agro Bukit, among others as follows:

- Detailed 1: 32,000 soil survey soil map carried out from September 2006 to April 2007 from Param Agricultural Soil Survey, assisted by the Agronomy Department of PT Agro Bukit. The soil survey report informs the type of marginal soil and / or fragile soil, along with its area. Soil properties which are the limiting factors in oil palm cultivation include soil with a very sandy and spodic texture, deep peat and low fertility.
- PT Agro Bukit's peat nature map with a scale of 1: 50,000 from the Geodatabase Department of GIS and GPS. The map informs us that there was peat soil with a depth of 0.5-1.5 m covering an area of 457 ha; 1.5-3.0 m covering 913 ha; 3.0-5.0 m covering an area of 1,906 ha and > 5.0 m covering an area of 3,570 ha. Then, the sandy texture of the soil is also informed, namely spodosol covering an area of 663.89 ha and loamy sandy 513.03 ha.

Based on the results above, it can be concluded that the CH has marginal land such as sand texture, spodic (hardpan) and peat layer.

4.3.2

The CH has shown a topographic map (the results of detailed land surveys by Param in 2007) Scale of 1: 100,000, slope level at PT. Agro Hill includes: 0-2 degree slope and 3-6 degree slope. Then there is no area with slopes steep and very steep. So there is no planting strategy for the sloping area. It also has been verified during field observations.

4.3.3

The CH has had road maintenance program for each Estate. The program includes manual upkeep, mechanical upkeep by heavy vehicles, and hardening road by laterite soil. The program and realization reports includes tables per Estate per month and summary, as well as maps of program and realization. For instance, in period of April 2018 to March 2019, has been conducted hardening road by laterite amount of 117 km from the budget 150 km covers main road and collection road. The maps were available. Based on field observations in all Estate, the main and collection roads were in good condition, hardened, able to use for FFB transport or upkeep activities.

4.3.4

The CH has had management procedures related to peat land subsidence, while the procedures include:

- Chapter 24: Ref. Code: OP / C24 / 07/07/01, issued 1st July 2007 concerning Oil Palm Planting on Organic Soils
- Chapter 8: Ref. Code: OP / C8 / 03/09 / 02, rev. date March 23, 2009 concerning Planting Techniques.
- Chapter 4: Ref. Code: OP / C4 / 03/09 / 02, rev. date March 23, 2009 concerning Water Management In Oil Palm Plantations.
- Guidelines for Effective Water Management in Peat soils, approved and signed by the Head of Agronomy Department dated 31 July 2017.

Has shown Peat Subsidence document which contains documentation on measuring the subsidence of peat in identified area. There are a total of 10 subsidized stakes, including 5 units installed since 2008, and 5 unit installed in 2014. Average peat subsidence data was 3.6 cm/year.

4.3.5

There are no replanting programs or activities in all Estate units of PT. Agro Bukit. The year of planting oil palm between 2005 - 2008, so that drainability study has not yet conducted.

4.3.6

Based on semi detailed map, other marginal area identified were sandy soil and hardpan. The strategy to reduce the limiting factor on sandy soil was implementing EFB mulching application amount 40 – 60 ton/ha/year, that has been verified in Sawahan Estate. Whereas related the hardpan, harpan splitting has been carried out by digging in the interrow during planting, it has been verified in Tanah Putih Estate Block B10 and C10.

Status: Comply

4.4

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

4.4.1 & 4.4.2.

The CH has developed water management plan referring Environmental Impact Assessment (E.I.A) document RKL-RPL year 2006. 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 plan described the objectives such as water sources including catchment pond, rainfall records, water requirement, current, water quality, management riparian and contingency plan.

According to environment monitoring analysis, it was informed that the company activity has no negative affect. Base on EIA implementation report Semester 1st 2019 such as surface water testing namely Binti river and Lenggana river, it was informed that the company activity has not affect is already the standard required (PP No. 82/2001 Class 2). Based on interviews with residents of housing complex on Sawahan Estate, known source of drinking water and clean water is from drilled wells and no complaints about water supply and quality.

Based on field visit in riparian area Lenggana river Blok K25 A Sawahan 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.

The company showed permit the utilization of waste water industry palm oil on the ground in PT Agro Bukit located in Natai Baru Village, North Mentaya Hilir Subdistrict, East Kotawaringin Regency with SK 188.45 / 170 / HUK-BLH / 2014 date on 30 April 2014 valid for 5 years. Land area of 600 ha.

Regarding the validity period of the Land application permit, expired on April 30, 2019, the company shows documents for the extension permit process, Minutes of review, field visit, and study for the utilization of POME for land application on PT Agro Bukit May 14, 2019. Based on interviews with management representative until the audit ASA-4, the Land application permit extension letter still awaiting approval from the Regent of Kotawaringin Timur. *Has become OFI Number 02 in indicator 2.1.1.*

POME are processed first in the WWTP pond and Based on the waste pond layout, Sungai Binti Mill has 10 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.

The POME quality test result by accredited laboratory shows that the effluent quality especially BOD, pH and COD for period January to June 2019 has fulfil the standard required Minister of Environment Decree (*KepmenLH*) No. 28 year 2003. Base on field visit in Sungai Binti Mill, no indication over flow effluent in WWTP, flow meter was well functioned and there is no issues from stakeholders related to land application.

Based on field observations in the Block D31 and E34 (Sungai Binti Estate) land application show that there is no Run-off, POME has been applied in accordance with the blocks that have land application permits.

4.4.4.

The company has recorded its actual water use. The average water use per tonnes FFB for period of January – June 2019 is 0,8 m3/ton FFB from budget 1.25 m3/ton FFB. There is evidence payment of surface water utilization tax to the Government of Central Kalimantan for period of October 2018 to March 2019.

Status: Comply

4.5

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

4.5.1, 4.5.2

The plan of integrated pest management was arranged in Procedure of Integrated Pest Management (No. OP/C21/05/14/04). The procedure set the early warning system, that is regular census of potential pest and diseases, emphasizing the mechanical and biological control, such are planting of beneficial plants (*Turnera subulata*, *Cassia cobanensis*, and *Antigonon leptosus*), as well as installing and monitoring barn owl boxes to suppress rat infestation. The procedure also set the economical threshold for each pest and disease, that the chemical control will be conducted only if the infestation has been raised the economical threshold. In other related procedure, stated the CH policy to conduct selective weeding, to maintain the biological diversity in order to suppress pest and disease infestation.

The CH has shown documentation of monthly potential pest and disease census, such as rat and leaf eater caterpillar. The census conducted by trained worker. The latest training was conducted on 8 April 2019. Based on census summary of July 2019, known that there is no pest and disease infestation above the economical threshold, so that there was no usage of pesticide for pest and disease control, except for routine weed control. The CH also shown the maps of barn owl boxes, it was verified based on field observation in Sawahan Estate and Sungai Binti Estate. Field observations in each Estate also verified that visually there is no symptoms of leaf eater caterpillar infestation on the canopy, nor the rats infestation on the FFB collected in the FFB platform. Beneficial plants such as *Turnera subulata* and *Antigonon leptosus* have been planted in main and collection road. The barn owl boxes were in good condition and well monitored, as well as indicates the occupation of barn owl.

Status: Comply

4.6

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

4.6.1

The CH shown justifications that the pesticides used were registered in Pesticide Commission, Ministry of Agriculture. The pesticides also used based on the list on Pesticides Recommendation (No. 560.566/177/WAS.KK/V/2019) from Labor Agency of Kotawaringin Timur Regency. The CH has had the document of identification of those recommended pesticides trademark, includes active ingredients, type (systemic/contact), LD50, target species, and WHO class. Those pesticides also has been verified and registered on pestisida.id website. The pesticides chosen and used by the CH has been considered that had specific to target species and minimum negative impact on non target species.

4.6.2

The routine pesticides application were for weed control in circle and path using a.i of *Glyphosate*, *Metyl metsulfuron*, and *Triklophyr* conducted every four months. The CH has documentation of Pesticide Toxicity for each Estate that record product name, active ingredients, LD50, percentage of active ingredients, total application, total active ingredients, hectare application and active ingredients per ton FFB production for each month and todate. For instance for Sawahan Estate in period of June 2019, has been used nine pesticides trademark. The usage of Round Up™ (Glyphosate) of todate June 2019 amount 0.0000000018 kg/a.i/tons of FFB.

4.6.3

In line with the explanation of criterion 4.5 that IPM has been carried out quite effectively, so that there is no chemical use for pest control, but for routine weed control. Pesticides are used regularly for weed control in the circle and harvesting path with interval every 4 months. The usage of pesticides has been monitored in monthly of each type of pesticide in per division and block. The certificate holder does not use pesticides prophylactically. If the conditions of circle and harvesting path are still quite standard, the weed control will be postponed. Based on observation of spraying activities, the application method is not a preventive application, but rather selective for locations that have weeds.

4.6.4

The CH shown evidences that the pesticides categorized in WHO 1A and 1B class, listed in Stockholm and Rotterdam Conventions, and paraquat are not used or minimized. Based on list of pesticides used, it is known that the pesticides used by the CH are included in WHO II class (medium hazard) and WHO III class (minor danger), there is no usage of Paraquat. It also has been verified by field observation in chemical warehouse and spraying activity.

4.6.5, 4.6.9

Based on interview with spraying worker, they have received internal training related handling pesticide and spraying technic annually. Also there was records of training for plasma worker. The workers can demonstrate safe working practices in accordance with the existing procedures, such as spraying in the direction of the wind, or prohibition of spraying on riparian, and understanding emergency response in the event of an accident. Knapsack sprayers are in good condition, personal protective equipment has been used according to MSDS and HIRAC such as boots, apron, rubber gloves, mask, safety goggles. Pesticide solutions are mixed in pesticide warehouses and transported by special vehicles. After work, knapsack sprayer and PPE are stored in a special storehouse at the Estate.

4.6.6 & 4.6.10.

Procedures related to handling chemicals / pesticides are contained in document No. SOP.EHS.BBB-01 concerning the management of hazardous and toxic materials (B3). The SOP regulates, among other things, that storage is carried out according to recommendations provided in the MSDS, the placement of chemicals that have no similar characteristics must be separated according to MSDS recommendations, chemical preparation and expenditure is carried out in first out (FIFO), chemical containers must have labels, chemicals are only issued based on requests approved by the authorities. Records of the storage and expenditure of agrochemical materials (including pesticides) contained in documents include the following:

- Check the environmental inspection and monthly OHS for pesticides and fertilizers.
- List of hazardous waste used.
- Hazardous waste producer sheet.
- EHS briefing.

Based on observation at agrochemical storage, it is known that pesticide store has well manage. The Company shows hazardous waste balance of 2018 carried out by the *Bank Sampah Indonesia* on May 6th, 2019 with vehicle number AD 1834 AV such as used pesticide packaging of 70 kg with manifest number is ARB 0006892.

Based on interview with Pesticide Applicator on Block H29 Division 1 Sungai Lenggana Estate and hazardous waste officer in Sawahan 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.

4.6.7

Based on document review and field observation, as well as interview with the workers, th CH shown evidences that the pesticides application has been conducted by methodes that has minimum risk and negative impacts to workers or environmental. Work equipment and PPE were stored in special warehouses, including for mixing pesticides, and washing after work. The rinse solution is stored in a special place and used again as a mixing agent in the next day's activities. Pesticide solution is brought to the field by special vehicles. The spraying activity conducted in selective manner by knapsack sprayer that the nozzle regularly calibrated.

4.6.8

Based on document review, field observation, as well as stakeholder consultation, known that the CH did not applied pesticides aerially.

4.6.11

The company has carried out employee health checks at each estate located in Central Clinic, health checks including cholinesterase, pregnancy checks, dermatomycosis, and blood pressure. The company shows the results of the inspection as follows:

- Sungai Binti Estate
Employee health checks are carried out on March 14-15, 2019. From the results of the health examination of 24 employees of Sungai Binti Estate it is known that all employees are in a healthy condition and ready to work.
- Tanah Putih Estate
Employee health checks are carried out on March 22-23, 2019. From the results of the health checks 21 employees of the Tanah Putih Estate are known to have 1 employee detected as being pregnant. The company shows the employee mutation document since March 23, 2019 to be a manual maintenance employee, while the remaining 20 employees are in a healthy condition and ready to work.
- Sungai Lenggana Estate
Employee health checks are conducted on April 11 – 12, 2019. From the results of the health examination of 24 employees of Sungai Lenggana Estate it is known that there are 2 employees who experience hypertension so that doctors provide references to improve their diet and routinely check blood pressure at the clinic, while the remaining 22 employees in a healthy condition and ready to work.
- Sawahan Estate
Employee health checks are carried out on July 22 – 23, 2019. From the results of 46 health examinations of Sawahan Estate employees, it is known that there are 5 employees who experience hypertension so that doctors provide references to improve their diet and routinely check blood pressure at the clinic, while the remaining 41 employees in a healthy condition and ready to work.

4.6.12

The company has established a system for identifying pregnant and breastfeeding women as described in the spraying procedure with document number SOP.PLT.SPR-01 dated May 4, 2015 determined by the director of the plantation. in the procedure explained that the company banned female workers from carrying out spraying work.

The company already has a checklist of spray workers who are not pregnant or breastfeeding, which is conducted once a month by medical officers at the clinic. For example, in the July 2019 period it was discovered that no spray female employees were pregnant and breastfeeding.

Based on interviews with workers in spraying activities in Sungai Binti Estate, known that workers have understood the prohibition of pregnant and lactating women to work in spray activities, if any are pregnant or lactating workers transferred to manual care activities and not related to agrochemicals.

Status: Comply	
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4.7

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

4.7.1

The OHS policy was endorsed by the Chief Operating Officer on May 30, 2017, which explains that the company is aware that all activities of developing oil palm plantations and managing crude palm oil production can have an impact on the environment, the health and safety risks of employees, contractors and visitors.

The results of field observations and interviews with estate and mill employees are known that the company has routinely conducted socialization regarding the company's OHS policy. The employee explained that the socialization was carried out during the morning briefing before work and the installation of OHS warning boards in several strategic places that were easily seen by employees.

The work plan of the OHS Program for January to December 2019 covers the areas of extension & training, supervision field, evaluation field; Field of research, Health Sector; PIC; Cost Forecast, Timeline of completion (Jan - Dec 2019) and

description. Based on interview result the workers are given guidance through socialization, warning boards and morning briefings before the work. Based on the above explanation, the workers has known about OHS policy.

Evidence of OHS work program implementation has recorded in training report, medical check-up report, records of purchasing of OHS related equipment's (PPE, first aid kit, fire extinguisher, hydrant, etc.), OHS Committee monthly meeting notes and three-monthly OHS Committee reports. Furthermore, Evaluation of OHS program, achievements and its monitoring was presented in OHS Committee monthly meeting notes and three-monthly OHS Committee reports.

Based on field observation at Sungai Binti Mill, Sungai Binti Estate and Sungai Lenggana Estate, it was found first aid box, and fire extinguishers stations were satisfactory maintained. Regular checklist monitoring were also available. Moreover, simulation of hydrant were considered satisfactory.

4.7.2.

Certificate holder has showed the document of Hazard Identification, Risk Assessment and Control (HIRAC) for the period of January-December 2019. The HIRAC has covers all working activities on the mill and estates. The analysis has covers risk hazard identification, sources of hazard risk, frequency (routine, non-routine, emergency), potential risk identification (sources and impacts), control management, risk analysis of severity level and value level. Crosscheck to the field, the compliance of application of product requirements which presented in MSDS and HIRADC document. For example, based on observation towards pesticide applicator in Sungai Binti Estate, it was found that respirator used by applicators were in accordance with MSDS and HIRADC requirement.

4.7.3

The company has included every employee in a training program to improve employee skills in accordance with the applicable legal requirements. during the audit activity, the company can show mill and estate training certificates and licenses.

The company has shown document of PPE distribution to all workers in estates and mill, which signed by Assistants, Chief of OHS Committee and the respective workers. Based on field observations and interviews with harvesters, pesticide applicators and mill operators, they have been equipped with PPE in accordance with procedures owned by the company for example, PPE for harvesters such as helmets, glasses and boots. Further explained that, workers can apply for the replacement by providing the damaged PPE to the foreman and the foreman will check and apply to Assistant to provide new PPE for the workers.

4.7.4

The company has an OHS Committee that has been ratified by the relevant agency based on the Head of the Decree of the Department of Manpower and Transmigration of Central Kalimantan Number KEP.10/DISNAKERTRANS//2019 dated January 15, 2019. In the decree it was explained that the company already had a secretary who was an OHS Expert on behalf of Agus Setiadi Jaya who has had an appointment letter based on the Indonesian Minister of Manpower Decree number KEP.P.6647/NAKER-BINWASK3/IX/2017 dated October 24, 2016. In the decree, it was explained that the decision was valid for 3 years from the date of stipulation.

4.7.5.

Certificate holder already has procedures in case of accident and emergency along with its instructions, CH show the following documents:

- Procedures for accidents and emergencies listed in the Accident Emergency Response document, document number SOP.EHS.ERP-02, Revision 00 / 05-05-2015 approved by the Director of Engineering.
- First aid procedure, document number SOP.EHS.ERP-01 revision 00 dated May 4, 2015 concerning First Aid Officer (First Aider) methods, first aid kit (general, soft tissue injury, snake bite, broken bone, drowning, fainting, insect bites and other dangerous animals, eyes exposed to pollen and nosebleeds).

Based on interview with mill and estate workers are known that the company already know the procedure about OHS. To facilitate evacuation in the event of an emergency, the company has established an evacuation route. The evacuation route is available in offices, housing and mill. Besides that, it has been equipped with maps and other markers and adequate sign boards. To the visitors who come will be socialize safety induction as a guide health and safety in the visit

process.

The auditor did not meet the First Aid Officer in the field, but the auditor conducted interviews with first aid officers who were also clinical nurses. The results of the interviews indicate that the company always provides periodic internal training to first aid workers in each unit with the aim that officers can understand the use of each item in the first aid kit and the actions taken if there are employees who experience work accidents. Furthermore, it was explained that the monitoring carried out on the contents of the first aid kit covers the life and cleanliness of first aid kits.

4.7.6

The company has registered all of its employees as member of government scheme on health and workforce insurance (*BPJS Ketenagakerjaan* and *BPJS Kesehatan*). Permanent worker daily and/or monthly basis got Insurance on work accident (*JKK*), old age benefit (*JHT*), dead insurance (*JKM*), retirement insurance (*JP*) and health insurance (*JKS*). Meanwhile for piece-worker, the company has only responsible for work accident insurance and dead insurance. However, most of non-permanent workers were family member of permanent workers (as wife). Hence, its health insurance was under their husband. Record of insurance payment for example:

- Employment insurance for 2,288 permanent worker of PT Agro Bukit period of May 2019, has been paid on May 9, 2019. Payment receipt has been verify by auditor.
- Employment insurance for 2,243 permanent worker of PT Agro Bukit period of June 2019, has been paid on June 11, 2019. Payment receipt has been verify by auditor.

The company also shows the following proof of payment for health and employment insurance for contractor workers as follows:

- Proof of payment of PT Sagas Putera Bangsa's Labor Insurance for the period of July 2019, which was paid on July 17, 2019, for a total of 47 employees with a value of IDR 94,816,276.
- Proof of payment of PT Sagas Putera Bangsa Health Insurance for the period of May 2019 paid on June 10, 2019 for a total of 47 employees with a value of IDR 38,299,252

Based on the results of verification of work accident monitoring documents in 2018/2019 and interviews with employees at mill and estate it is known that in 2018/2019 there are only accidents with minor categories in workplace so that there are no claims for workplace accidents in 2018/2019.

4.7.7

Reports on work accidents have been reported using the LTI metric, informing the number of accident periods 2017/2018, documents informing: Data collection and monitoring (management units, number of time lost injury cases (LTI), number of time non-lost injuries) (LTI) cases, total number accident cases, total hours worked, total frequency and savings rates based on verification documents.

Status: Comply

4.8

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

4.8.1

The company has had training programme 2019 for staff and workers related all aspects of RSPO principles and criteria. The training programme for all employees based on identification of needs that prepared by management. The annual training programme covered all estate and mill activities. Based on document review, Interviews with local contractors and management unit explained that there was no training program for contractors.

The company shows the training documents given to smallholders as follows:

- Safety Spraying Training on 30 January 2019. The training was attended by 15 participants.
- Safety Fertilizer Training on 19 July 2017. The training was attended by 26 participants.

Observation of operational activities in all estate known that the workers are known to have received training, and are able to demonstrate safe working practices in accordance with procedures.

4.8.2

The company has documented well every training conducted in each management unit. Documentation in the form of

training materials, attendance lists and training evaluations. At the time of the audit activity, the company can show training records for the period January - June 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.

The Regent of East Kotawaringin Decree Number: 03 / Commission-Kotim / VIII / 2006 dated August 7th, 2006 concerning the Environmental Feasibility of Oil Palm Plantations and Processing Plants by PT Agro Bukit in East Kotawaringin Regency, Central Kalimantan Province. The company is obliged to carry out environmental management and environmental monitoring as stated in the *RKL-RPL* document that has been approved and reported every 6 months to the Environmental Agency East Kotawaringin Regent and related agencies. The scope of this document is an oil palm plantation with an area of + 13,930 ha and a processing plant of 90 tons of FFB / hour.

In the preparation of EIA documents contained evidence of consultation with the stakeholders. There is EIA committee meeting minutes involving stakeholders such as government agencies from the local, district and sub-district Ketapang Mentawa Baru, Mentaya Hilir Utara sub district, village head Sawahan. There is evidence of minutes and attendance. This activity was carried out on April 1st, 2006. The EIA document has been cover all area and activities in Matrix *RKL/RPL*.

5.1.2 & 5.1.3

CH has conducted environmental management based on documents of Environmental Management Plan / Environmental Monitoring Plan, 2006, such as Meso climate, Ambient air quality, noise level, Potential risk of forest and land fires, Physical of soil, Chemical of soil, Water discharge, Erosion and sedimentation, River water quality, Wildlife and etc. The matrix of the *RKL-RPL* covers the environmental impacts that are managed, the sources of important and large impacts, managed environmental parameters, environmental management objectives, environmental management activities, environmental management locations and environmental management periods. Record of implementation of Environmental Management describe in *RKL-RPL* implementation report semester 1st year 2019 and has been reported to environment agency Kotawaringin Timur Regency July 23, 2019.

Implementation of environmental monitoring was described in *RKL-RPL* implementation report. Based on the *RKL-RPL* implementation report of semester 1st of 2019 known there isn't negative impact caused by CH, such as the result of mill effluent quality testing that conducted periodically has been accordance with the standard qualities set by the government. Interview with Environmental Agency of Kotawaringin District show that company has been submit the *RKL-RPL* implementation report every six month and there isn't negative impact caused by company.

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.

HCV identification was carried out by IPB for 2 months (August - September 2009) by Ir.H.Nyoto Santoso, MS who has been RSPO Approve Assessor.

The HCV public consultation was held on October 21st, 2009 at the Sampit Family Hotel Cottage was attended by 64 people (security forces, company representatives, surrounding village community representatives, sub-district representatives, mass media, education consultants, company representatives around PT Agro Bukit, NGO (BOSF and WWF). Based on the peer review document from Proforest stated that all members in this team are registered and approved by RSPO as HCV Assessors.

Based on HCV area data for the October 2018 period, the area include in the scope of certification (HGU) is:

HCV area	Location	HCV Type	Area (ha)
SS. <i>Lenggana</i>	Sawahan Estate	1.1; 1.3; 2.3; 3; 4.1	197.8
SS <i>Anak Lenggana</i>	Sungai Lenggana Estate	1.1; 1.2; 1.3; 2.3; 4.1	103.5
Ecosystem Unique <i>Kerangas</i> Forest	Tanah Putih Estate	1.3; 2.3; 3; 4.1	129.7
Total			431

Based on table above, total area of HCV is 431 ha.

5.2.2 & 5.2.4.

The company shows HCV monitoring plans for period April 2018 – March 2019 such as:

- Riparian area management (HCV boundaries marking and maintaining, marking of chemicals application borders, HCV socialization to surrounded community and workers, planting of erosion control plants and HCV area patrols)
- Management of RTE species.
- To conduct species identified protection.
- HCV monitoring (monitoring of HCV attribute, monitoring of HCV in monthly and monitoring of HCV rehabilitation).
- Implementation of company procedure related to HCV management.
- And others.

The enhancement and result of the HCV / RTE monitoring review for next HCV program. The review of the 2018 program, it will become a HCV program in 2019, for example Repairing HCV signboard September 2018 has not been fully completed and has been programmed in September 2019.

The company has management and monitoring HCV for 2017 – 2022 and there is a review every year. Such as monitoring of area boundaries, monitoring the condition of biodiversity and others.

The company shows a list of wildlife species and protection status for the 2018 period, found 21 species of wildlife included in the IUCN (Least Concern) category and 2 types of CITES APP II such as long-tailed monkeys (*Macaca fascicularis*), Bubut Alang-alang (*Centropus bengalensis*), Kipasan belang (*Rhipidura javanica*), Biawak (*Varanus salvator*), and others.

Based on field observation on riparian area of Lenggana river in Block M07/08 Sawahan 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 monthly. It was reported that there were no conflict between human and wildlife.

5.2.3.

SOP for handling orangutans and wildlife no SOP-OUST-01 document (Rev. 02/26 March 2013). The company shows existence of HCV areas socialization that are carried out every one a year to workers and village communities around PT Agro Bukit.

Based on interview with village head from Penyang Village, Pasir Putih Village, and Bagendang Tengah Village The CH has conducting socialization on HCV area and protected fauna within estates operational areas which also informed by signboard. Moreover, there were found no protected fauna on offices and employees housing complex for estate and mill which in capture and keeping. The Afterward, Based on interview with sprayer operator at Sungai Lenggana Estate they are known that the labor had understand about HCV management, RTE species and has been trained in RTE species.

5.2.5.

Based on interviews with village communities revealed that the riparian area agreement had been made and so far there had been no conflict with the community regarding the area. The program conducted by company is socialization of HCV Management and Fire Prevention / Management land fire 17 June 2017, attended by 17 residents of Pasir Putih village.

Based on interviews with nearest community namely Pasir Putih village and Bagendang Tengah village, known that an agreement letter on riparian area has been carried out year 2017 and so far there has been no conflict with the community related to the area.

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

The management unit of the estate and the POM has identified the sources of waste and their management in accordance with the SOP for Waste Management (No. SOP-WM-01, Revision 02, 26 March 2013). The Company has identified waste sources that include type of waste, source of waste and location. The list of sources of waste generated such as the pesticides containers, medical waste, used oil, EFB, shell and fiber, mill effluent etc. The waste products are sourced from estate activities, mechanics in the workshop activities, and palm oil processing factory activities.

5.3.2. & 5.3.3.

During ASA 3 there is non conformity (2018.08) on indicator 5.3.3 regarding waste management's not in accordance with the SOP regarding waste management with the document number SOP. EHS. LIM-01

For example;

- In point 4.6, domestic waste produced by housing must be sorted between organic (paper, food and wood) and inorganic waste (plastic, bottles & cans) and estate facilitating separate trash bins according to their type in each housing.
- In point 4.3, the oil packaging is stored at hazardous storage and sent to the collector.
- In point 4.3, household liquid waste (non hazardous waste) is flowed into oil and sediment traps before being released into the environment.

Regarding those issue the CH can presented corrective evidence as follows:

Assessor Evaluation and Conclusion (filled by auditor):

Verification, December 9, 2018.

The company shows proof of improvement such as documentary evidence of photos of drains for domestic waste but has not been shown proof of improvement for other non-conformity points. So this is stated to have not been fulfilled.

Verification, December 27, 2018.

The company shows the minutes of handover of hazardous waste on 11 & 12 October 2018 with the following details:

- Used oil as much as 600 liters.
- Filters as many as 4 pairs.
- 1 pair of used buckets.
- 1 pair of used water jerry cans.
- 6 pairs of used oil drums.
- Used 2 drums of oil.
- Filter as many as 1 pair.
- Used Nalco buckets of 5 pairs.
- 4 pairs of coolant radiators.
- 4 pairs of oil jerry cans.
- 1 kg of used paint can.
- 5 pairs of large paint cans.
- Large 3 pairs of paint rollers.

Based on the explanation above, the company has not shown other proofs of improvement in accordance with identified non-conformities such as: mixing waste between organic & inorganic; domestic waste spillage; use of oil drums; spilled & spilled clam ingredients; oil & fuel. So this is stated to have not been fulfilled.

Verification 9 August 2019

- Mixing of domestic waste organic & inorganic: based on visits on TPE & SWE housing complex, known there are organic and inorganic domestic waste bin in each housing complex.
- Domestic waste spills: based on visits on TPE & SWE housing complex, known that there are sediment trap & oil trap for domestic sewerage on house number W19 block H8, (SWE & TPE) and house number W14 block H34.
- There are chemical spill: lubricant & fuel, the company shown documentation consist of socialization of parking control for the contractor unit and oil trap for contractor unit transportation

- The use of used lubricant drums for fresh water container on housing complex. The evidence for improvement consist of:
 - Socialization related to PPE, OHS and domestic waste and hazardous waste management October 24, 2018 in Sungai Lenggana Estate block J33 / J34 for 44 workers, related to use of used lubricant drums still becomes NC on ASA-4 Audit (NC number 2019.05) for indicator 6.5.3.
 - There is a monthly EHS Inspection (monthly environmental and OHS inspection checklist) on TPE housing complex conducted by EHS Inspector September 8, 2018 on TPE housing complex, based inspection results no hazardous waste on TPE housing waste used for fresh water container.
 - For use of used lubricant drums for fresh water container on housing complex, still becomes NC on ASA-4 Audit (NC number 2019.05) for indicator 6.5.3.

Based on evidence submitted NC number 2018.08 declared is comply.

The result of inventory in Sungai Binti and Estate such as spray activities produce waste, such as used 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 Sungai Binti Mill 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 extension permitted hazardous waste storage from Head of Kotawaringin Timur Decree Number. 660/004/BLH-Eks-SDA/II/2016 February 12 2016 valid 5 years.

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 January to March 2019 addressed to environment agency Kotawaringin Timur Regency.

Training for pesticide applicator regarding the disposal used pesticide containers was carried out May 21, 2019. Based on interviews with pesticide applicator on block H29 division 1 Sungai Lenggana Estate and pesticide warehouse officer Sawahan Estate, the employee understood of hazardous and toxic waste management procedures and evaluation of control management on hazardous and toxic waste management.

The company shown the Mou to transport, collect and process hazardous waste with PT Bank Sampah Indonesia number PT AB/C/288.3.1 valid until November 30 2019, between PT Agro Bukit, PT Bank Sampah Indonesia, and PT Karya Nusa Bumi Persada. The Company routinely shipment hazardous waste, the last shipment by PT. Bank Sampah Indonesia May 6, 2019 consist of :

- a. Used lubricant oil is 1820 kg manifest number ARB 0006883.
- b. Used battery is 180 kg manifest number ARB 0006882.
- c. Used filter is 300 kg manifest number ARB 0006886.
- d. Medical waste is 24 kg manifest number ARB 0006879.
- e. Used Hazardous chemical container is 70 kg manifest number ARB 0006892.
- f. Used Rags, spill kit and gloves contaminated 20 kg manifest number ARB 0006880.
- g. Used grease container is 40 kg manifest number ARB 0006893.
- h. Used tonner is 40 kg manifest number ARB 0006881.

Base on field visit in Temporary storage hazardous & toxic waste central workshop 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.

The company has identified the source of waste and pollution source and treat the identified source to reduce emission and pollution. The effort taken by the company are:

- Empty fruit bunch is applied to estate plantation area to substitute chemical fertilizer. Based on field visit EFB application is well managed.
- Shell and fiber are reused for engine fuel of boiler. It reduce the carbon emission from the combustion of fossil fuel.
- POME use for fertilizer, based on field visit the condition of flatbed has been maintenance well and no environmental

pollution potential.

- The managing for clinical waste, the company also has cooperation with licensed parties such as PT Bank Sampah Indonesia.

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, such testing April, 2019. 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 Government Regulation Number. 41 years 1999.

Domestic waste.

The waste management procedure (SOP.EHS.LIM-01) in clause 4.6 is explained the domestic waste produced by Housing complex shall be sorted organic waste (paper, food and wood) and anorganic (plastic, bottles & cans) and estate prepare for domestic waste bin and separated according to garbage type on each housing complex and transported to landfill.

Base on document verification, the company shown monthly report EHS Inspection (monthly environmental and OHS inspection checklist) on SLE, TPE SWE and SBE housing complex explained inspections have been carried out in relation to the burning of waste in each housing.

Based on inspections results conducted by the EHS Inspector July 2019 on SLE, TPE SWE and SBE housing complex, no domestic waste burning. However, based on visits housing complex on Audit ASA-4 SWE, TPE, SLE and SBE) found domestic waste burning activities.

The domestic waste management has been implemented accordance with procedures.

Verification 2 September 2019

The company shown evidence consist of:

- Evidence of socialization related to prohibition of domestic waste burning activities for worker on Sawahan Estate on housing complex 29 August 2019, worker of division 3 13 workers, division 1 17 workers, division 5 20 workers, division 4 13 workers, and division 1 12 workers.
- Evidence of socialization related to prohibition of domestic waste burning activities for worker on Tanah Putih Estate on housing complex 29 August 2019, worker of division 1 & 2 20 workers, division 3&4 13 workers, division 3 20 workers, division 2 20 workers, and division 1 17 workers.
- Evidence of socialization by EHS inspector related to checking / inspection of all housing complex 22 August 2019.
- The signboards of prohibiting waste burning and the use of used lubricant drums or ex-chemical container on Sawahan Estate and Tanah Putih Estate housing complex.
- The banners has been installed related to the prohibition of burning garbage and the use of use chemicals container.
- Internal Memo Number.001 / AB-IM / GMO / VIII / 2019 28 August 2019 from General Manager for all resident of housing complex related to the Prohibition of Waste Burning & Use chemical container. Explaining of :
 - Prohibition to burn garbage around housing complex such domestic waste, and dry leaves.
 - Pack domestic waste into plastic bags so easy to pick up and transport by janitors.
 - Arrange domestic waste on public road before being disposed to temporary garbage bin.

Based on that's explanation raised non conformity No 2019.02 with Major Category

Minor 5.3.3	Status: Non Conformity No 2019. 02 with Major (recurrent Minor) Category
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5.4

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

5.4.1.

The Company already maximizing the use of renewable energy (fiber & shell) as boiler fuel. For example use of shells and fiber in January to June 2019 was 3,965.12 ton, which produces 3,987,021 kWh of electricity from turbine. Renewable energy use per ton of palm product in the mill is 13.60 kwh / ton CPO. Result Direct fossil fuel used is 0.14 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 no-burn policy is contained in the land clearing SOP No. OP / C2 / 03/09/02 regarding jungle to palm planting and zero burning for land clearing states that the company adopts zero burning techniques. Based on field observations during audit ASA-4 in the plantation area and housing complex area did not evidence activities any land burning activities. Replanting activities are done mechanical.

Status: Comply

5.6

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

5.6.1.

The company has done an identification of pollution and emission sources at the Palm Oil Mill, which is documented in the SOP for identification, Mitigation, and Calculation of Greenhouse Gas Effect, No. SOPEHS.GHG-01 (Rev-00) approved on April 8th, 2014. The sources of pollution and emissions, among others: Processing and Transportation, POME, Residential etc. The Company has conducted emission tests that has been carried out every six months and has been explained in the *RKL-RPL* document.

5.6.2 & 5.6.3.

The results of document verification and field visits, it is known that the company has made efforts in reducing GHG emissions, such as:

- Has installed a dust collector to catch dust or particles flying in the air and also has monitored the air quality carried out by conducting air quality testing and reported every semester contained in the RKL- RPL report The use of fiber and shells as a boiler fuel.
- Utilization of waste water for Land applications.
- Utilization of EFB for composting.
- Monitoring the physical condition of WWTP and perform the recorded volume of waste water that is applied.
- And others.

To reduce pollution and emission, the company also has identified the pollution sources and emissions and the management steps which are described in SOP of Waste Management. In addition, company also identified GHG sources included plan for reducing it. The company has been test noise level on April 2019 (1st semester 2019) by laboratory accredited of KAN LP 195-IDN. The results still accordance with threshold Minister of Environment Decree number 48 year 1996. The company monitors noise levels on several locations, such as housing complex SBE, SLE, TPE, SWE, Tanah Putih Village and Sawahan Village.

Base on field visit on high noise station on Sungai Binti Mill such as boiler, sterilization, and engine room found that operators are equipped with appropriate PPE (ear muff) and warning signs for high noise areas are available for examples in engine room.

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 Full Version.

Summary of Net GHG Emissions period January – December 2018 i.e. :

Emissions per product	tCO ₂ e/tProduct	Extraction	%	Production	ton/year
CPO	4.09	OER	21.15	FFB Processed	389,432.89
PK	4.09	KER	5.43	CPO Produced	82381.75

Land Use	Ha
OP planted on mineral soil	9008.40
OP Planted on peat	5290.61
Conservation (forested)	555.30

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	181068.68	16.33	35691.88	8.69	-	-
*CO ₂ emissions from fertilizer	4680.13	0.42	1866.14	0.45	-	-
N ₂ O emissions from peat	39604.24	3.57	0.00	0.00	-	-
N ₂ O emissions from fertilizer	6719.24	0.061	2677.78	0.65	-	-
Fuel consumption	2254.13	0.20	724.63	0.18	-	-
Peat Oxidation	288867.31	26.05	0.00	0.00	-	-
Sinks						
Crop sequestration	103817.98	-0.36	-38471.11	-9.36	-	-
Conservation Sequestration	-4315.40	-0.39	-776.70	-0.19	-	-
Total	415060.35	37.43	1712.62	0.42	-	-

Summary of Mill Emissions and Credits

	tCO ₂ e	tCO ₂ e/tFFB
Emissions		
POME	396.05	0.00
Fuel Consumption	1783.24	0.00
Grid Electricity Utilization	0.00	0.00
Credits		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	2179.29	0.01

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	86564.50

PK from other sources	0.00
Fuel consumption	0.00
Total crusher emissions	86564.50

During audits, auditor teams have been verified accurate data has been put into the RSPO Palm GHG calculator for examples related to fossil fuel usages, pesticides usages, statement area, HCV data, and etc. Meanwhile this GHG calculation are excluded LUC emission due to there is no New development after November 2005.

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.
The management unit keeps documents that explain the social impact identification, namely:

- EIA Document of PT Agro Bukit, which covers a 13,930 Ha of oil palm plantation and a processing, mill with a capacity of 90 tons FFB per hour. This document was authorized through a Decree of the Regent of Kotawaringin Timur No. 04/komisi-kotim/VIII/2006 on 7 August 2006.
- SIA Document that was composed by PT Agro Bukit together with Faculty of Forestry of IPB in 2011. The respective SIA has covered both positive and negative impacts on social aspect resulting from the activities of the plantation and the mill.

The process of composing said document has involved all impacted parties, such as the stakeholders that were joining the meeting of EIA discussion held on 1 April 2006; and the participation of the people of Ketapang Village, Tongkang Village, and Telawang Village in the event of EIA dissemination on May 31st, 2012.

6.1.3.
Documents verifications its known if the CH has been conducted review of the SIA documents for period April 2018 - March 2019, regarding positive and negative impacts due to operational company. based on review the positive impacts as follows job opportunities, , accessibility is easy and the village is easily accessible and there are business opportunities, furthermore there is negative impacts for example decreased river water quality, decreased availability of ground water, dust from FFB and CPO transportation and an increasingly consumptive society. Based on that's review The CH can presented documents SIA action plan reports for the next period, but it cannot be presented related:

- a. Social impact monitoring and management plan to avoid or reduce negative impacts and increase positive impacts based on the results of consultations with affected parties,
- b. Evidence that the results of the management and monitoring of social impacts carried out by the company in the previous period, has become a benchmark in the identification of the latest monitoring and management of social impacts
- c. Impact management and monitoring program by stating the implementation schedule / period and the officer responsible.

Based on that's explanation raised non conformity No 2019.03 with Major Category

6.1.4
Documents verifications its known if the CH has been conducted review of the SIA documents for period April 2018 - March 2019,. However, based on documents verifications its known if:

- The participatory method used does not fully cover all the factors that can cause social impacts (both positive and negative) such as usage and access rights, traditional rights or customary rights owned by indigenous and tribal peoples, to the latest issues that develop in around the company's operational area.
- The sample representation is not entirely representative of all affected parties (including local residents, women representatives, migrants, workers (local, migrants) to identify sources of impacts and potential social impacts, and determine recommendations for management and monitoring of social impacts.

Based on that's explanation raised non conformity No 2019.04 with Minor Category
6.1.5.

Documents verifications its known if the company has been develop smallholders plantations with the total area 1,555.5 Ha that involved five village and five cooperative. the company's attention related to the development of smallholder plantations, the company has conducted several programs as follows:

- inventory of location, area and land status of prospective smallholdings
- making participatory smallholder development plans in several villages in October and November 2018
- Smallholder plantations management is managed by the company

6.1.3

Status: Non conformity No 2019.03 with Major Category

6.1.4

Status : Non conformity No 2019.04 with Minor Category
6.2

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

6.2.1

The CH has Communication, Participation, and Consultation Procedure (IMS.P-05) which explain that communication in verbal and written form with the type of communication in the form of complaints, suggestions, requests for information including the provision of information, reporting, consultations, notifications, instructions, complaints of sexual harassment, invitations etc. The procedure is available in Bahasa Indonesia and English.

6.2.2, 6.2.3

The person in charge for communication and consultation is Public Relation, CSR, or related department. The PIC will be responsible for communicating and consulting with local communities and other interested parties. The CH also made list of stakeholder including local communities and affected parties or other interested parties. The latest list of stakeholder of 2019, consist of government parties (Subdistrict, regency, and Province), surrounding village, internal stakeholder, mass media, NGO, and schools. All communication from stakeholder is documented in Communication Record (F.07 EMS). All incoming letter from stakeholder were requests for assistance and have been responded to by the CH. The CH also showed evidence of responses to the incoming letters. Based on interview with Plasma Cooperative of Sinar Mentari Pagi, Village Head of Pasir Putih and Bagendang Tengah, as well as local contractor of FFB transporter, it is known that the stakeholder understood the PIC and how to communicate and consultation with PT Agro Bukit. The letter sent to PT Agro Bukit would be responded to no later than two weeks after the letter was sent.

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:

- Communication, Participation, and Consultation Procedure (IMS.P-05).
- Grievance handling procedure No CSR 8 dated July 1, 2010.
- Media Response Procedure dated July 1, 2010.

The company has been conducted socialization regarding complaints handling. The socialization was held on October 20, 2018 which was attended by 40 employees from Sungai Binti Estate. The socialized complaint mechanism, for on Tanah Putih Estate worker October 7, 2018 and local contractor on March 1, 2018. The company have the training Evaluation Form with Complaints SOP Material for example to Surihati from Sungai Binti Estate on November 20, 2018.

Based on interview with workers in Sungai Binti, Sungai Lenggana, Sawahan, and Tanah Putih Estate, and local contractor, they are known the complaint mechanism.

6.3.2

CH has Media Response Procedure Number Doc CSR11 which explains about mechanism for handling communication,

issue, or complaint form mass media. The procedure states that article in mass media will be reviewed, make the action plan, chronology report, review report, and arrange meeting with related party and make final report.

During ASA-4 Audit, there is issues from the mass media (online newspapers) to PT Agro Bukit namely related "Buruh Sawit Demo di Depan Kantor Bupati Kotawaringin Timur "July 15 2019 - 10:32 +GMT". The company has been respond to the issue accordance with documentation Number. 01 / CSR / VI / 19 / Media, Borneo New paper, July 15 2019 from Agro Harapan Lestari Media Relations.

Responses for issue from mass media are documented on complaint form mass media, accordance with Media Response Procedure Number Doc CSR11 and managed by the Public Relations and CSR division.

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

Procedure for identifying land ownership, the procedure for calculating and how to pay compensation has not changed from the previous assessment stated in the new Land Development Preparation Procedure No. SOP.EHS.NPP-01 2010 was revised on March 30, 2016.

Based on field visits and interviews elderly in (including previous land owner) obtained information if currently there is no issue related land tenurial or land disputes between the company and other parties. The whole planted area by the company has been compensated. The compensation process involved all community witnessed also by the Village Head, Sub district head and others relevant parties. Records of land compensation process consist of: document of land identification and inventory, land location maps, statement of release of land rights by owner, Receipt of Payment, Minutes of compensation/Compensation and witnesses. This is stored in their respective estate according to the location of the land. Until the audit was carried out, there was no written complaint from the community regarding the land dispute

Even though the area of PT Agro Bukit from forest concession company, the company has been carrying land compensation to the affected parties. The land compensation was carried out since 2005 - 2013 with the total area ± 30,891.40 Ha. The CH has shown that land acquisition has been done through by negotiation.

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

Central Kalimantan Governor Regulation No. 51 of 2018 in term of Minimum Wage of Kotabaru district for period of 2019 as much as IDR 2,776,460.62. Wages in 2019 have been adjusted since January 1, 2019. Based on document verification, field observation, interview with workers (manuring workers, harvester, spraying team, mill workers) there's no indication about the force labour. In addition They get the wage suitable with the wage minimum regulation. Interview with Labor Union, said that wages and overtime paid are in accordance with applicable regulations.

Internal Memo from the Director with number 005/AAL-SPU/HR/XII/2018 regarding wage adjustments for daily workers and permanent workers in 2019. In the memo, several things are explained, among others:

- Daily worker wage is IDR 111,058 / day
- Permanent worker wages are IDR 105,958 plus rice allowances according to the marital status of each employee.
- Hourly overtime rates for permanent workers who have a salary in accordance with the minimum wage of 2019 is IDR 16,049 / hour.
- For monthly employees, the company will regulate the salary related to the increase in salary.
- This memo is valid from January 1, 2019

The results of interviews with plantation and mill employees found that until now the company had never made any deductions from employee wages.

6.5.2

The company can show the company regulation for the period 2018-2020 which has been ratified by the East Kotawaringin Regency Manpower Office which explains the work conditions, rights and obligations of workers. The company regulation has also been approved by the East Kotawaringin Regency Manpower Office with Decree No. KEP.349 / HI-KESJA / VII / 2018 dated July 30, 2018.

At the time of the audit activity, the company shows the document work agreement between the employee and the company that explains the type of work and salary, duties and responsibilities, working hours, health and medical, termination of employment, and others. The work agreement is written in Indonesian and the worker has understood the substance of the contract.

The results of interviews with operational employees in the estate and mill are known that employees have understood the rights of employees listed in the company regulation, for example: the right to get in kind, the right when employees are sick, reproductive rights for female employees, and the right to get wages feasible in accordance with applicable regulations. In addition, the employee also explained that the union regularly held socialization related to the contents of the company regulation to employees who did not understand.

Based on interviews with the management, known that the company never deducts wages from employees. The company pays employee wages in accordance with applicable regulations. During the audit activity, the company shows sample salary payment for estate and mill worker period of July 2019. From the results of document review, known that employees have received basic wages in accordance with the minimum wage stipulated by the local government.

The results of field observations and interviews with worker unions revealed that the company did not employ employees illegally. All employees have a document of agreement to work from the family before starting work

6.5.3

The CH has provided facilities and infrastructure to support the worker welfare in each management unit, such as permanent housing, electricity sources through generator sets available in each housing, clean water through the provision of bore wells and the provision of clean water tanks in each unit, clinics available in each unit, there is a place for kindergarten and elementary school. Based on field visits in the housing area are known that there are several stalls belonging to employees that provide basic daily necessities at affordable prices.

The results of a field visit at the employee's housing found the use of used oil drums that are used as water reservoirs. Interviews with housing residents obtained information that the drums they got from outside the company with the aim of additional water reservoirs, because the water reservoirs currently available are limited and deemed insufficient.

One of the company's efforts to overcome this, can be shown the Capital Expenditure Form (CEF) for the provision of the 2019 Water Treatment Plan emplacement H34 and H8. There has been an offer submitted by PT Borneo Indo Services on March 4, 2019, but until the audit activity has been carried out there has been no further progress from the making of the WTP's. **Based on that's explanation raised non conformity No 2019.04 with Major Category**

6.5.4

The company has provided facilities and infrastructure to support the worker welfare in each management unit, such as permanent housing, electricity sources through generator sets available in each housing, clean water through the provision of bore wells and the provision of clean water tanks in each unit, clinics available in each unit, there is a place for kindergarten, elementary school and junior high school. Based on field visits in the housing area are known that there are several stalls belonging to employees that provide basic daily necessities at affordable prices.

The results of field observations and interviews at the employees of mill and estate housing are known that the company has provided adequate housing facilities for employees. Family-owned employees are given 1 house while single employees are given 1 house for 3 people. Further explained by the employee that damage to the house can be reported to housing supervision for further corrective action in accordance with the applicable mechanism.

6.5.3	Status: NCR 2019.05 with Major (recurrent Minor)	
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 and 6.6.2 <p>The union policy for workers is still the same as before, which is stated that "the company respects the right of every staff / employee to form and join within the labor Union according to their choice as well as for collective bargaining".</p> <p>Based on document verification, worker union has attended the meeting regularly. During audit activities, the company shows minutes of meetings between Worker Union and companies in the 2018 – 2019 period</p> <p>Based on interviews with Worker Union known that the company always support work programs of Worker Union, companies give rights to Worker Union in accordance with applicable regulations, while for election of Worker Union officials is carried out through member voting and no intervention from the company.</p> <p>Based on interviews with Worker Union are known that until now the relationship between companies and labor unions is still well established and there has never been a conflict between the two parties, this is because the company always supports each union work program and always maintains communication between the two parties.</p>		
	Status: Comply	
6.7 Children are not employed or exploited.		
6.7.1 <p>Available SOP Employee Recruitment at PT Agro Bukit. That was explain about prohibits to employ children and make a prevention the use of child labor in our operations. Take a corrective action, if founded the child labor and ensuring that the appropriate follow up and provide safety to them. According to interviews with worker union, filed visit in mill and estate, there was no child labor usage has found.</p> <p>Based on interviews with workers on estate and mill, known that each employee knows the minimum age at work, which is 18 years, further explained that this is routinely delivered at the morning briefing and through the installation of appeal boards in several places. This is in line with the results of verification of the employee list document which is known that the company does not employ under 18 year old workers.</p> <p>Based on field observations of harvesting activities at Sungai Binti Estate, and Sungai Lenggana Estate known that there are special worker to collect loose fruit, there are no children found on the harvesting areal. All harvester are registered as company employees.</p>		
	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 and 6.8.3 <p>The policy for non-discrimination is contained in the Social Policy which was revised and approved on 7 September 2017 by the Director of Sustainability. That was explain about the company will give equal opportunities to all workers and embrace diversity, regardless of ethnicity, religion, disability, gender, political affiliation, sexual orientation and or worker union.</p> <p>During the audit activity, the company can show a record of the identity of the worker when applying for an employee. Available copies of ID cards, educational certificates, family cards, biography, marriage certificates and good conduct certificates from the police.</p> <p>Based on field observations at Mill office and Estate Office known that the policy is installed on the front office wall so that</p>		

it is easily known to stakeholders and employees. Further explained by the management representative that the company routinely provides socialization regarding equality of rights to employees during the morning briefing. Whereas the results of field observations and interviews with employees in estate and mill operational areas were not identified as complaints related to discrimination.

The company shows a list of employees for the period 2019 which describes the age, gender, religion, ethnicity, place and date of birth. Based on the document, known that workers come from various ethnicities, religions, regions of origin, ages, sexes and companies also do not have migrant workers. Based on interviews with Worker Union and Workers, it was explained that the company did not discriminate against workers from admission to promotion.

The company has not been able to clearly demonstrate the identification of employee needs for each job and its long-term employee recruitment program.

Status: Comply

6.9

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

6.9.1

Consistent with previous assessment that the certificate holder has social policy which was ratified on September 7, 2017 by the Sustainability Director. The policy explained that the company strongly opposed acts of sexual harassment and was committed to creating and ensuring a work environment free of acts of sexual harassment. The policy is communicated by means of information dissemination from company representatives and policies installed in offices and clinics. Based interviews with workers, known that the policy has been disseminated to employees, especially women who are aware of the policy on protecting women's rights.

The company has formed a Gender Committee in management unit. Based on interviews with the Gender Committee and female workers known that breastfeeding workers are not permitted to work using chemicals. Workers who are breastfeeding are also given the opportunity to breastfeed their children.

6.9.2

Consistent with previous assessments that the policy to protect all reproductive rights, especially for women listed in the "Good Policy Social Policy", which was endorsed by the Director of Sustainability on September 7, 2017, contained that the company would endeavor to prevent sexual harassment and all forms of violence against women and protect their reproductive rights.

The interview results with the management known that the policy is communicated by socialization to employees and the installation of banners in offices and clinics. Based on interviews with the Gender Committee and female workers, known that workers can explain the reproductive rights of women who are given such leave for 2 days of menstruation and maternity leave for 3 months.

6.9.3

Consistent with previous assessments that the mechanism for handling complaints, respecting anonymity and protecting the reporter stated in Circular Letter, number 006 / HR-RO / V-2011, regarding Guidelines for Complaints Handling, dated May 4, 2011. Based on interviews with women workers, it is known that workers already know the mechanism for submitting complaints regarding sexual harassment and violence through the chair of the gender committee.

Based on interviews with Worker Union and the Gender Committee, known that there were no complaints especially related to immoral act, If there is a complaint, it will be recorded in the complaint book and a complaint resolution will be sought and the results submitted to the workers.

Status: Comply

6.10

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

6.10.1, 6.10.2

The result of document review at ASA 4, known that the CH has been conducted the development of 1,555.5 ha of plasma (scheme smallholder) consisting of five cooperatives (Bima Penyang Mandiri, Rongkang Jaya Mandiri, Permata, Bangkuang Makmur Lestari, and Sinar Mentari Pagi), with an MoU signed in period of December 2018 until January 2019. In the MoU, the mechanism for purchasing FFB by Mill is determined based on the FFB price determination of the Plantation Agency, however the payment of FFB will begin in August 2019.

Whereas for non-plasma FFB suppliers, in the agreement explained that the purchase price of FFB was determined based on daily market prices, for example contained in the Agreement with CV Rajawali Surya Palma (No. PTAB/C/373.1). The results of interviews with CV SAP - Local Contractors of FFB and EFB transport from Pasir Putih Village, known that the price mechanism is determined according to market prices and notified daily in writing or by telephone.

6.10.3, 6.10.4

The results of interviews with CV SAP - Local Contractor of FFB and EFB transport from Pasir Putih Village, Plasma Head of Sinar Mentari Pagi Cooperative, including management, it is known that the work contracts have explained the pricing of each work unit. The parties have understood the provisions of work contracts, the contracts have been made fairly, transparently and legally. For SAP CV, the payment of work has been conducted in a timely manner, in accordance with the provisions in the contracts, i.e. no later than the 20th of the following month.

Status: Comply

6.11

Growers and millers contribute to local sustainable development wherever appropriate.

6.11.1

Based on the results of interviews with the community, it is known that the company involves the community every year in identifying community needs in the framework of preparing a CSR plan. The company also shows identification documents for surrounding community needs such as Basic Needs data from the Regional Development Planning Agency

The company shows CSR programs in 2019 with funding plans for infrastructure development activities, public health, economic improvement, contributions to traditional activities, cultural & religious activities, donations, providing training to increase local business.

6.11.2

Documents verifications its known if the company has been develop smallholders plantations with the total area 1,555.5 Ha that involved five village and five cooperative. the company's attention related to the development of smallholder plantations, the company has conducted several programs as follows:

- inventory of location, area and land status of prospective smallholdings
- making participatory smallholder development plans in several villages in October and November 2018
- Smallholder plantations management is managed by the company

Status: Comply

6.12

No forms of forced or trafficked labour are used.

6.12.1; 6.12.2 and 6.12.3

Listed in the social policy approved by Head Plantation Upstream Indonesia December 2011, in section 5 mentioned that Plantation Upstream Indonesia is not allowed to use forced labor or labor under age. All data related to the selection of initial recruitment, saved in the office area and some copies (copy) recorded in each unit respectively. Companies can also show the work agreement signed by both parties to prove that the workers are employed in accordance with the agreement of both parties. Each worker has a copy of the employment agreement. In the work agreement there is no statement that the worker will be charged when an employee resigns before the contract ended

Based on verification document of employee, work agreements, employment mandatory report and the results of interviews with local government, community and employees during field observations, there were several things, for example: no identification of contract substitutions, companies not using migrant workers, companies not trading labor or forms of forced labor because all workers already have work agreements with companies.

Based on interviews with Mill and Estate employees it was found that there was no indication of forced labor. Employees explain that all rules in working at the company have been regulated in a Collective Labor Agreement that has been agreed upon between the company and the Workers' Union as representatives of workers.

6.13
Growers and millers respect human rights

The company's human right policy contained in Social Policy dated 1 May 2015, stated prohibition of the discrimination based on race, degrees, ethnicity, gender, skin color, physical (defective/imperfect), a membership organization, political views, religious and/or age, prohibition of sexual harassment, and prohibition of forced labor and child labor.

Socialization was carried out during the morning briefing and through notifications on information boards in the Estate and Mill. Based on interviews with workers in Estates and Mill, Labor Union, and Gender Committee, there was no issue related to violations of workers' human rights.

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.

Based on the document review of area statement and field visits, it is known that there were no new land clearing activities since ASA-3 to ASA-4 took place.

Status: Comply

7.2
Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.
7.2.1; 7.2.2

The land suitability map for oil palm planting is contained in a semi-detailed 2007 soil survey report carried out by Param Agricultural Soil Survey and Agronomy Department of PT Agro Bukit. Maps are available on a scale of 1: 32,000. The company can also show the oil palm peat map with a scale of 1: 50,000 from the GIS and GPS Departments. Both maps inform that there is peat soil with a depth of 0.5-1.5 m covering an area of 457 ha; 1.5-3.0 m covering 913 ha; 3.0-5.0 m covering an area of 1,906 ha and > 5.0 m covering an area of 3,570 ha. Then, the sandy texture of the soil is also informed, namely Spodosol covering an area of 663.89 ha and loamy sandy 513.03 ha. In terms of the attack, it was informed that estate slopes ranged from the flat to undulating category (0° - 6°).

Based on the planting year distribution document, it is known that the youngest palm age is 2012, after that there is no expansion area for the development of new planting.

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 a Land Use Change Analysis by Aksenta, HCV assessment was carried out in August - September 2009 with a total management area of 15,543.25 ha, total area of raw liability covering 12,586.15 ha, total conservation liability area of 0 ha. LUCA results according to the reviewer are conclusion in PASS. So there is no compensation liability at PT ABCK. But there is a remediation area in form of riparian zone. It is highly recommended to update all of the clarification data on LUCA Report and reporting template of the company.

LUCA status:

October 2nd, 2017: company sends email to RSPO to clarify the status of LUCA PT. Agro Bukit.

October 4th, 2017: Respond from RSPO Compensation through email with statement as follow:

The BHCWG has agreed to remove the endorsement of the LUCA review report from the RaCP. However, the report will be made available to the compensation panel, should it be requested.

Therefore, **the LUCA review report for ABCK is accepted**. Based on the report:

1. The Final Conservation Liability (FCL) is 0 Ha.
2. There seems to be a clearance of riparian areas in 2006-2007, based on the report, the total area requiring remediation is 152.11 Ha.

The conclusion and recommendation of LUCA verification result document for PT Agro Bukit Central Kalimantan States is for Total area of management unit 15,543.25 ha, Total area of raw liability 12,586.15 ha and Total area of conservation liability 26 ha, based on Result of LUC Analysis & methodology review has been declare **PASS**.

In accordance to PT Agro Bukit Central Kalimantan LUCC analysis report, there is no discrepancy found between the calculations by the reviewer and the company on land covers hectares of shapefile data. There are differences between raw liability of hectares calculation conducted by the reviewer and the company. Based on review result, the raw liability is more than the calculation by the company. The reviewer found that there are 26.6 ha of net liability that should be compensated by the company based on clearing over land cover with coefficient 0.7. The reviewer found that there is no information about the issuance date of HCV report. There is remediation area in form of riparian zone. It is highly recommended to update all of the clarification data on LULC report and reporting template of the company.

	Status: Comply	
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7.4

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

7.4.1; 7.4.2

The land suitability map for oil palm planting is contained in a semi-detailed 2007 soil survey report carried out by Param Agricultural Soil Survey and Agronomy Department of PT Agro Bukit. Maps are available on a scale of 1: 32,000. The company can also show the oil palm peat map with a scale of 1: 50,000 from the GIS and GPS Departments. Both maps inform that there is peat soil with a depth of 0.5-1.5 m covering an area of 457 ha; 1.5-3.0 m covering 913 ha; 3.0-5.0 m covering an area of 1,906 ha and > 5.0 m covering an area of 3,570 ha. Then, the sandy texture of the soil is also informed, namely Spodosol covering an area of 663.89 ha and loamy sandy 513.03 ha. In terms of the attack, it was informed that estate slopes ranged from the flat to undulating category (0° - 6°).

Based on the planting year distribution document, it is known that the youngest palm age is 2012, after that there is no expansion area for the development of new planting.

	Status: Comply	
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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

Based on the document review of area statement and field visits, it is known that there were no new land clearing activities since ASA-3 to ASA-4 took place.

	Status: Comply	
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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

Based on the document review of area statement and field visits, it is known that there were no new land clearing activities since ASA-3 to ASA-4 took place.

	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 no-burn policy is contained in the land clearing SOP No. OP / C2 / 03/09/02 regarding jungle to palm planting and zero burning for land clearing states that the company adopts zero burning techniques. Based on field observations during audit ASA-4 in the plantation area and housing complex area did not evidence activities any land burning activities. Replanting activities are done mechanical.		
	Status: Comply	
7.8		
New plantation developments are designed to minimise net greenhouse gas emissions.		
7.8.1 & 7.8.2.		
The company does not open land above January 2015, so it is not obligate to calculate High carbon stock.		
	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.		
Based on document verifications, interview with managements and field observation the CH can presented action plant related continuous improvements as follows:		
Internal Audit and management review CH has conducted regular review of the activities trough RSPO and operational internal audits, social environmental management and monitoring plan, as well as management review. The latest RSPO Internal Audit (includes ISPO, ISPO, OHS, OHSAS) was conducted on 25 February – 2 March 2019, and 22 – 26 July 2019. All nonconformity has been followed up by each unit management. Whereas the latest management review was held on 16 March 2019		
BMP aspect The CH has policy not to use the pesticides categorized in WHO 1A and 1B class, listed in Stockholm and Rotterdam Conventions, and paraquat, as well as to reduce other pesticide as a part of integrated pest management. There were evidences related implementation of the policy, such as regular census, planting beneficial plant and installing barn owl boxes. The IPM has been carried out quite effectively, so that there is no chemical use for pest control, except for routine weed control.		
Environmental Aspect The company has implemented commitment to reduce environment impacts on the regular action plan. For example: <ul style="list-style-type: none"> - Effluent management and monitoring. WWTP pond management, effluent quality test and report it to Kotawaringin Regency Environment Agency. - Air quality management and monitoring. Road maintenance, air quality test and report it to Kotawaringin Regency Environment Agency. - Ground water management and monitoring. Testing ground water quality and report it to Kotawaringin Regency Environment Agency. - Hazardous waste management. Storing hazardous waste at the permitted hazardous waste, managing and monitoring hazardous waste (conducted by Kotawaringin Regency 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>Sungai Binti POM take legal ownership for all FFB within its scope, as well all physically handling. Organization that conduct physically handled of RSPO product is Certificate Holder of Sungai Binti POM and transporter. Sungai Binti POM didn't buy CPO from others sources.</p>								
	Status: Comply								
5.1.2	<p>Traders and distributors require a license obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model.</p> <p>The certificate holder does not buy product certified from RSPO licensed traders, every product of CPO & PK is produced from own estate and sold to the buyer.</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 certificate holder shows registration and reporting requirements for the appropriate supply chain through the organization that manages the RSPO supply chain with the following details:</p> <table><tr><td>Member Name :</td><td>PT Agro Bukit</td><td>Core Product :</td><td>Palm Oil</td></tr><tr><td>Account UID :</td><td>RSPO_AC1000003298</td><td>Member ID :</td><td>RSPO_PO1000003333</td></tr></table>	Member Name :	PT Agro Bukit	Core Product :	Palm Oil	Account UID :	RSPO_AC1000003298	Member ID :	RSPO_PO1000003333
Member Name :	PT Agro Bukit	Core Product :	Palm Oil						
Account UID :	RSPO_AC1000003298	Member ID :	RSPO_PO1000003333						
	Status: Comply								
5.1.4	<p>Processing aids do not need to be included within an organization's scope of certification.</p> <p>There is no processing aids in the operational Sungai Binti POM.</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>Sungai Binti Mill is certified palm oil mill which implement Mass balance using Module E-CPO Mill for its supply chain models, its due to Sungai Binti Mill receive and processed FFB form non certified area and outgrower</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>Sungai Binti Mill is certified palm oil mill which implement Mass balance using Module E-CPO Mill for its supply chain models, its due to Sungai Binti Mill receive and processed FFB form non certified area and out grower</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>Sungai Binti POM has established procedure to Ensuring Traceability of RSPO Certified Products (CPO, PKO, PKE). This procedure describes the mechanism of FFB separation, version 05/2019 dated 20 May 2019. In the procedure has been described in the procedure related to the identification of the raw material since from field and recorded in delivery consignee (vehicle number, driver, estate, division, departure time, destination, block, planted year, loose fruit</p> <p>Based on field visit on Sungai Binti POM, obtained information if PIC for SSCS implementation (for examples weight bridge operators) that training and refreshment (awareness) of supply chain management system were carried out annually. The company can separate RSPO certified and non-certified products. Every FFB from non-certified area will be classified as a non-Certified product. Result interview with weighbridge operator can be demonstrated related FFB received from certified area (marked with stamps)</p>
	Status: Comply
5.3.2	<p>The site shall have a written procedure to conduct annual internal audit</p> <p>Procedure to conduct annual internal audit is listed on Ensuring Traceability of RSPO Certified Products. This procedure explain that the responsible of Finance Manager is to ensuring compliance to the requirement of the RSPO Supply Chain Certification Standard.</p> <p>CH has conducted internal audit on 22 – 26 July 2019 included ISO 14001, OHSAS 18001, RSPO, ISPO, and SCCS Standard, SOP, and records. Results of internal audit its known if there is no findings or no non-conformity identified related to supply chain management system.</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>Sungai Binti POM does not purchase RSPO certified oil palm products. Sungai Binti POM is the producer of RSPO certified oil palm products.</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>Sungai Binti POM does not purchase RSPO certified oil palm products. Sungai Binti POM is the producer of RSPO certified oil palm products</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>Documents verifications, interview with management it's know if There is activities that outsources to independent third parties are Transport for CPO and PK. CH also has SOP No IMS.P-07 about Control of Selected Suppliers / Contractors. This procedure describe the method of contractor/supplier selection.</p> <p>After processed the FFB, facility only sell their certified product (CPO) to the buyer directly. Certificate Holder using contractor for transporting the CPO and Palm Kernel. Currently SBM have procedure to ensure the certified material (CSPO and CSPK) not being mixed with non-certified product. Based on field observation and interview with security in SBM the efforts made by the company to ensure that the independent third party / contractors complies with the requirements of the RSPO Supply</p>

Chain Certification Standard as follows:

- security and the dispatch foreman must verify the transport tank before filling in, ensuring that all tank contents have been removed and the tank is completely empty
- after filling it is done sealing the upper manhole and bottom valve and each existing outlet
- security must ensure seals and record transportation data in accordance with existing procedures

Status: Comply

5.5.2

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

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

Certificate holder ships the kernel using contractor. CPO is sold as Book and Claim. There is work agreement between CH and contractor, for example:

- Work agreement No PKS/SBM/CPO-TRANSPORT/iii/2018/006 with CV Flora Jaya Makmur. Date of agreement 14 February 2019 with term period 1 year. February 28, 2018 valid until February 28, 2019.

CH also has SOP No IMS.P-07 about Control of Selected Suppliers / Contractors. This procedure describe the method of contractor/supplier selection. Regarding RSPO and SCCS requirements, based on interview with contractor they will provide access to CB to their respective operations, systems, and etc during audit.

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.

Name and contact detail of contractor has been listed in document of List of Contractor PT Agro Bukit Central Kalimantan as follows:

No	Name of Contractor	Product Services	Address
1	CV AIN Ito	Transporter CPO & PKO	Jln Padat Karyawan, RT 016 Siderajo Arut Selatan Kobar
2	PT Jaya Harapan Nusa Sentosa	Transporter CPO & PKO	Jln Jendral Surdiman km 4.5 no 88 Sampit
3	CV Batuah Sehati	Transporter PK & PKE	Jln Jendral Surdiman km 0,5 no 37 Sampit
4	CV Anugerah Kita	Transporter CPO & PKO	Jln Tidar Block A no 69 Sampit
5	CV Flora Jaya Transport	Transporter CPO & PKO	Jln Gatot Subroto No 17 Sampit
6	CV Berkah Rezeki Abadi	Transporter CPO & PKO	Jln Elang No 52 Sampit

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

Based on document verification and interview with head of administration, until ASA.4 there are no new outsources (transporters).

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

Documentation for the Sustainable Crude Palm Oil (Sustainable CPO), consist of: daily record of the FFB acceptance, daily record of CPO production, which classified as the CSPO, CPO (RSPO/ISCC) sale record, stock record that has been

reconciled with the FFB acceptance, monthly production and sale and annual recapitulation.

Documentation for the Sustainable Palm Kernel (Sustainable PK), consist of: FFB dispatch record, which further will be counted the daily production of the Sustainable PK, daily production record of the PK, which classified as the Sustainable PK, monthly recapitulation of the Sustainable PK's sale, stock record, which has been reconciliation with the FFB acceptance record, monthly sale production and annual recapitulation.

Status: Comply

5.7 Registration of transactions

5.7.1

Supply chain actors who:

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

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

Member Information

Member Name	PT. Agro Bukit
Member ID	RSPO_PO1000003333
License ID	CB61901

All transaction of RSPO certified oil palm products has been registered in RSPO IT Platform (see indicator SCCS 5.7.2).

Status: Comply

5.7.2

The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:

- Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures.
- Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually.
- Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.
- Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.

Documentation for the Sustainable Crude Palm Oil (Sustainable CPO), consist of: daily record of the FFB acceptance, daily record of CPO production, which classified as the CSPO, CPO (RSPO/ISCC) sale record, stock record that has been reconciled with the FFB acceptance, monthly production and sale and annual recapitulation.

Documentation for the Sustainable Palm Kernel (Sustainable PK), consist of: FFB dispatch record, which further will be counted the daily production of the Sustainable PK, daily production record of the PK, which classified as the Sustainable PK, monthly recapitulation of the Sustainable PK's sale, stock record, which has been reconciliation with the FFB acceptance record, monthly sale production and annual recapitulation.

For certification period August 2018 – July 2019 its known if there is CPO product sold as RSPO is 5,802.65 MT, certified product sold under conventional scheme has been remove from palm-trace which is 55,269.22 MT, for PK there is sold as RSPO is 13,625.25 MT.

- CSPO Sold as RSPO

No	Trade Date	Description	Product	Sold Quantity (MT)
1	22-Mar-19	PT SYNERGY OIL NUSANTARA	CSPO MB	1,500.00
2	16-Apr-19	PT ASIANAGRO AGUNG JAYA	CSPO MB	1,301.27
3	19-Jun-19	PT Asianagro Agung Jaya/Contract#SB01V06-10588	CSPO MB	2,000.57
4	25-Jun-19	PT Asianagro Agung Jaya/Contract#SB01V06-10595	CSPO MB	1,000.81
				5,802.65

- CSPK Sold as RSPO

No	Trade Date	Description	Description	Product	Sold Quantity (MT)
1	12-Sep-18	PVO	MB PK Contract#SB02VIII09-10519/LA 8	CSPK MB	880.070
2	26-Sep-18	PVO	MB PK Contract#SB02IX09-10523/MV Selasih	CSPK MB	628.71
3	10-Oct-18	PVO	MB PK Contract#SB02IX09-10525/LA 8	CSPK MB	522.6
4	2-Nov-18	PVO	MB PK Contract#SB02X10-10533/Ever Concord	CSPK MB	398.78
5	26-Nov-18	PT AB KCP Mill	Sold to PT AB-KCP	CSPK	613.64
6	26-Nov-18	PT AB KCP Mill	Sold to PT AB-KCP	CSPK	136.02
7	19-Jan-19	PVO	MB PK Contract#SB02XI11-10536/LA 8	CSPK MB	675.31
8	19-Jan-19	PVO	MB PK Contract#SB02XII01-10543/Ever Concord	CSPK MB	869.03
9	25-Jan-19	PVO	MB PK Contract#SB02I01-10550/LA 8	CSPK MB	314.14
10	15-Feb-19	PT AB KCP Mill	Sold to PT AB-KCP	CSPK	38.41
11	15-Feb-19	PT AB KCP Mill	Sold to PT AB-KCP	CSPK	869.92
12	15-Feb-19	PT AB KCP Mill	Sold to PT AB-KCP	CSPK	738.28
13	15-Feb-19	PT AB KCP Mill	Sold to PT AB-KCP	CSPK	221.43
14	15-Feb-19	PT AB KCP Mill	Sold to PT AB-KCP	CSPK	32.11
15	15-Feb-19	PT AB KCP Mill	Sold to PT AB-KCP	CSPK	886.79
16	9-Apr-19	PT AB KCP Mill	Sold to PT AB-KCP	CSPK	700.88
17	17-May-19	PT AB KCP Mill	Sold to PT AB-KCP	CSPK	968.57
18	17-May-19	PT AB KCP Mill	Sold to PT AB-KCP	CSPK	1129.18
19	19-June-19	PT AB KCP Mill	Sold to PT AB-KCP	CSPK	2000.57
20	01 Juli-19	PT AB KCP Mill	Sold to PT AB-KCP	CSPK	1000.81
					13,625.25

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

Sungai Binti POM has shown training plan that included the supply chain management training. The training is scheduled on May 2019

Mill also show the documentation of SCCS training for responsible personnel in supply chain activity, as follows:

- Training SCCS for contractors on 13 May 2019
- Training SCCS for PIC SCCS on 15 May 2019

Status: Comply
5.8.2

Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed

Sungai Binti POM has shown training plan that included the supply chain management training. The training is scheduled on May 2019

Mill also show the documentation of SCCS training for responsible personnel in supply chain activity, as follows:

- Training SCCS for contractors on 13 May 2019
- Training SCCS for PIC SCCS on 15 May 2019

Based on interviews with Logistic Clerk and weight Bridge Operator, it is known that the personnel understand their duties and responsibilities related to the implementation of supply. The workers also explained that this year they had been given training related to SCCS.

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

Based on SOP of Ensuring Traceability of RSPO Certified Products (CPO, PKO, PKE) which explains that implementation of the procedure is recorded in FFB Dispatch Note or FFB Collection ticket, security log book, mill production report, and so on. Retention time of the records shall be maintained at least 2 years minimum. Auditor has verified the document in 2017, for example FFB weighbridge ticket.

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

Based on SOP of Ensuring Traceability of RSPO Certified Products (CPO, PKO, PKE) which explains that implementation of the procedure is recorded in FFB Dispatch Note or FFB Collection ticket, security log book, mill production report, and so on. Retention time of the records shall be maintained at least 2 years minimum. Auditor has verified the document in 2017, for example FFB weighbridge ticket.

The record keeping saves in "Mass Balance Report of Sungai Binti Mill for example period of August 2018- July 2019. Within this record, the certificate holders maintain the FFB's sources based on monthly bases.

Month	FFB (MT)		
	RSPO Certified	Non Certified	Total
Total Period August 2018 – July 2019	257,918.68	116,740.16	374,658.84

Furthermore, Sungai Binti POM has record and balance of all RSPO CSPO and CSPK, non-certified products produced, as well as its dispatch on a monthly and three monthly basis, presented in the Table bellows:

CPO production and Dispatch

Month	CPO				
	Cert	Non Cert	Total	CSPO sold RSPO	CSPO sold Conventional
Total Period August 2018 – July 2019	62,181.03	18,029.38	85,322.70	5,802.65	55,269.22

PK production and Dispatch

Month	PK				
	Cert	Non Cert	Total	CSPK sold RSPO	CSPK sold Conventional
Total Period August 2018 – July 2019	14,461.32	6,516.26	20,977.58	13,625.25	-

Status: Comply
5.9.3

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

The estimate volume of sustainable CPO and PK are recorded in the Annex of certificate.

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

Sungai Binti POM only received and processed of FFB's as material input. This mill did not purchase CPO and/or PK from others. Therefore, this mill did not using conversion factors.

Status: Comply
5.10.2

Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.

Sungai Binti POM only received and processed of FFB's as material input. This mill did not purchase CPO and/or PK from others. Therefore, this mill did not using conversion factors.

Status: Comply
5.11
Claims
5.11.1

The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.

Based on Shipping Announcement and transaction report documents, CSPK submitted are in accordance with the applied supply chain model that is Mass Balance. CSPO sold as Non RSPO Certified and has been removed from certified stock as book & claim.

Status: Comply

5.12	Complaints
5.12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.
	Sungai Binti POM has SOP of Grievance Handling No CSR 8 revision 1 (July 1 2018) that explained the method of complaint handling from internal and external stakeholders. The complaint will be responded at least 14 days.
	Up to ASA-4 audit, there is no complain on the certified product sold.
	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
	Sungai Binti POM has done management review annually. The latest management review is held on 16 March 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.
	Sungai Binti POM shows Management Review Minutes conducted on 16 March 2019 discussing the follow up previous management reviews, result of internal audit covering RSPO, RSPO SCCS, ISPO, ISO 14001 & OHSAS 18000 and status of corrective and preventive action that conducted on February 2018. The management review has informed follow up of previous management review, result of internal audit & status of corrective and preventive action, changing circumstances, 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.
	Improvement of the effectiveness of the management system and its processes and resource needs is already included within the Management Review. Detail output of management review meeting as agreed on the meeting are available on the document of objective target program for financial year 2019 - 2020
	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.																	
Sungai Binti POM still implemented a model of supply chain Mass Balance. FFB supply source for Sungai Binti POM is still received from uncertified sources from outgrowers, PT Agro Indomas, PT RIM. The volume of products sold using Mass Balance claim.																	
	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.																	
Estimates of CPO and PK produced by PMF obtained from the actual data of 12 months before the audit activities and have been described in this ASA 1.3 report, consist of:																	
<table><tr><th>Products</th><th>Last Year Projected Certified Volume (MT)</th><th>Last Year Actual Certified Volume (MT)</th><th>Projection</th></tr><tr><td>FFB Own Estate</td><td>299,337</td><td>257,918.68</td><td>289,300</td></tr><tr><td>CPO</td><td>64,357</td><td>62,181.03</td><td>66,500</td></tr><tr><td>PK</td><td>16,164</td><td>14,461.32</td><td>15,900</td></tr></table>		Products	Last Year Projected Certified Volume (MT)	Last Year Actual Certified Volume (MT)	Projection	FFB Own Estate	299,337	257,918.68	289,300	CPO	64,357	62,181.03	66,500	PK	16,164	14,461.32	15,900
Products	Last Year Projected Certified Volume (MT)	Last Year Actual Certified Volume (MT)	Projection														
FFB Own Estate	299,337	257,918.68	289,300														
CPO	64,357	62,181.03	66,500														
PK	16,164	14,461.32	15,900														
	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).																	
Sungai Binti POM has registered and fulfilled all supply chain requirements through the RSPO IT supply chain managing organization (RSPO IT platform or book and claim).																	
<table><tr><th colspan="2">Member Information</th></tr><tr><td>Member Name</td><td>PT. Agro Bukit</td></tr><tr><td>Member ID</td><td>RSPO_PO1000003333</td></tr><tr><td>License ID</td><td>CB61901</td></tr></table>		Member Information		Member Name	PT. Agro Bukit	Member ID	RSPO_PO1000003333	License ID	CB61901								
Member Information																	
Member Name	PT. Agro Bukit																
Member ID	RSPO_PO1000003333																
License ID	CB61901																
Documentation for the Sustainable Crude Palm Oil (Sustainable CPO), consist of: daily record of the FFB acceptance, daily record of CPO production, which classified as the CSPO, CPO (RSPO/ISCC) sale record, stock record that has been reconciled with the FFB acceptance, monthly production and sale and annual recapitulation.																	

Documentation for the Sustainable Palm Kernel (Sustainable PK), consist of: FFB dispatch record, which further will be counted the daily production of the Sustainable PK, daily production record of the PK, which classified as the Sustainable PK, monthly recapitulation of the Sustainable PK's sale, stock record, which has been reconciliation with the FFB acceptance record, monthly sale production and annual recapitulation.

For certification period August 2018 – July 2019 its known if there is CPO product sold as RSPO is 5,802.65 MT, certified product sold under conventional scheme has been remove from palm-trace which is 55,269.22 MT, for PK there is sold as RSPO is 13,625.25 MT.

- CSPO Sold as RSPO

No	Trade Date	Description	Product	Sold Quantity (MT)
1	22-Mar-19	PT SYNERGY OIL NUSANTARA	CSPO MB	1,500.00
2	16-Apr-19	PT ASIANAGRO AGUNG JAYA	CSPO MB	1,301.27
3	19-Jun-19	PT Asianagro Agung Jaya/Contract#SB01V06-10588	CSPO MB	2,000.57
4	25-Jun-19	PT Asianagro Agung Jaya/Contract#SB01V06-10595	CSPO MB	1,000.81
				5,802.65

- CSPK Sold as RSPO

No	Trade Date	Description	Description	Product	Sold Quantity (MT)
1	12-Sep-18	PVO	MB PK Contract#SB02VIII09-10519/LA 8	CSPK MB	880.070
2	26-Sep-18	PVO	MB PK Contract#SB02IX09-10523/MV Selasih	CSPK MB	628.71
3	10-Oct-18	PVO	MB PK Contract#SB02IX09-10525/LA 8	CSPK MB	522.6
4	2-Nov-18	PVO	MB PK Contract#SB02X10-10533/Ever Concord	CSPK MB	398.78
5	26-Nov-18	PT AB KCP Mill	Sold to PT AB-KCP	CSPK	613.64
6	26-Nov-18	PT AB KCP Mill	Sold to PT AB-KCP	CSPK	136.02
7	19-Jan-19	PVO	MB PK Contract#SB02XI11-10536/LA 8	CSPK MB	675.31
8	19-Jan-19	PVO	MB PK Contract#SB02XII01-10543/Ever Concord	CSPK MB	869.03
9	25-Jan-19	PVO	MB PK Contract#SB02I01-10550/LA 8	CSPK MB	314.14
10	15-Feb-19	PT AB KCP Mill	Sold to PT AB-KCP	CSPK	38.41
11	15-Feb-19	PT AB KCP Mill	Sold to PT AB-KCP	CSPK	869.92
12	15-Feb-19	PT AB KCP Mill	Sold to PT AB-KCP	CSPK	738.28
13	15-Feb-19	PT AB KCP Mill	Sold to PT AB-KCP	CSPK	221.43
14	15-Feb-19	PT AB KCP Mill	Sold to PT AB-KCP	CSPK	32.11
15	15-Feb-19	PT AB KCP Mill	Sold to PT AB-KCP	CSPK	886.79
16	9-Apr-19	PT AB KCP Mill	Sold to PT AB-KCP	CSPK	700.88
17	17-May-19	PT AB KCP Mill	Sold to PT AB-KCP	CSPK	968.57
18	17-May-19	PT AB KCP Mill	Sold to PT AB-KCP	CSPK	1129.18
19	19-June-19	PT AB KCP Mill	Sold to PT AB-KCP	CSPK	2000.57
20	01 Juli-19	PT AB KCP Mill	Sold to PT AB-KCP	CSPK	1000.81
					13,625.25

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.												
Sungai Binti POM has established procedure to Ensuring Traceability of RSPO Certified Products (CPO, PKO, PKE). This procedure describes the mechanism of FFB separation, version 05/2019 dated 20 May 2019. In the procedure has been described in the procedure related to the identification of the raw material since from field and recorded in delivery consignee (vehicle number, driver, estate, division, departure time, destination, block, planted year, loose fruit)												
Based on field visit on Sungai Binti POM, obtained information if PIC for SSCS implementation (for examples weight bridge operators) that training and refreshment (awareness) of supply chain management system were carried out annually. The company can separate RSPO certified and non-certified products. Every FFB from non-certified area will be classified as a non-Certified product. Result interview with weighbridge operator can be demonstrated related FFB received from certified area (marked with stamps)												
	Status: Comply											
E.3.2												
The site shall have documented procedures for receiving and processing certified and non-certified FFBs												
Sungai Binti POM has established procedure to Ensuring Traceability of RSPO Certified Products (CPO, PKO, PKE). This procedure describes the mechanism of FFB separation, version 05/2019 dated 20 May 2019. In the procedure has been described in the procedure related to the identification of the raw material since from field and recorded in delivery consignee (vehicle number, driver, estate, division, departure time, destination, block, planted year, loose fruit)												
In the procedure described if some blocks of the estates are not 100% certified, because the certified areas of the estates are currently limited within the area of cadastral boundary only. Where as the cadastral line is inside of the blocks of the estates, FFB from areas with in this blocks are categorized as non certified FFB.												
	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 certified FFB of PNBM was supplied by own estate as certified sources and the non-certified FFB supplied from several non-certified plantation. There was any record mechanism on FFB's acceptance in PNBM, by separating FFB from own estate that being identified as certified FFB (RSPO certificate) and from other sources that not being certified (non-certified RSPO). Certified FFB will be processed and claimed as certified CPO and PKO. The table below is certified and non-certified FFB was recorded in summary monthly FFB received.												
The record keeping saves in "Mass Balance Report of Sungai Binti Mill for example period of August 2018 - July 2019. Within this record, the certificate holders maintain the FFB's sources based on monthly bases.												
	<table><tr><td rowspan="2">Month</td><td colspan="3">FFB (MT)</td></tr><tr><td>RSPO Certified</td><td>Non Certified</td><td>Total</td></tr><tr><td>Total Period August 2018 – July 2019</td><td>257,918.68</td><td>116,740.15</td><td>374,658.84</td></tr></table>	Month	FFB (MT)			RSPO Certified	Non Certified	Total	Total Period August 2018 – July 2019	257,918.68	116,740.15	374,658.84
Month	FFB (MT)											
	RSPO Certified	Non Certified	Total									
Total Period August 2018 – July 2019	257,918.68	116,740.15	374,658.84									
	Status: Comply											

E.4.2

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

The company shows estimates of certified CPO & PK products with the following details:

Past Annual Claim Certified Product	Last Year Projected Certified Volume (MT)	Last Year Actual Certified Volume (MT)
FFB Process	299,337	257,918.68
CPO Production	64,357	62,181.03
PK Production	16,164	14,461.32

Based on data above obtained information if the actual production below the projected.

Status: Comply

E.5

Record keeping

E.5.1

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

Sungai Binti POM has record and balance of all RSPO CSPO and CSPK, non-certified products produced, as well as its dispatch on a monthly and three monthly basis, presented in the Table bellows:

CPO production and Dispatch

Month	CPO				
	Cert	Non Cert	Total	CSPO sold RSPO	CSPO sold Conventional
Total Period August 2018 – July 2019	62,181.03	18,029.38	85,322.70	5,802.65	55,269.22

PK production and Dispatch

Month	PK				
	Cert	Non Cert	Total	CSPK sold RSPO	CSPK sold Conventional
Total Period August 2018 – July 2019	14,461.32	6,516.26	20,977.58	13,625.25	-

Status: Comply

3.3 Conformity Checklist of Certificate and Trademark Use

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

3.4 Summary of RSPO Partial Certification.

Good Hope Time Bound Plan (TBP) is explaining in point 1.10. Good Hope run 5 mills in Indonesia and has achieved RSPO certified for 4 (four) mills and supply base. Good Hope has informed the TBP progress, MUTU has considered that Good Hope is comply with the RSPO requirement for TBP. The Time Bound Plan was revised and declared by Good Hope dated 25 December 2015 approved by RSPO Manager.

MUTU has verified partial certification for un-certified unit's subsidiary of Good Hope based on their Time Bound Plan. There are eleven (11) uncertified management unit of Good Hope. MUTU Auditor verified positive assurance against the company internal audit and supporting evidence as well as any information from others sources.

MUTU Auditor has verified company partial certification and concludes that:

- There are no significant land conflicts which have not been declared above
- There has been no replacement of primary forest or any area containing HCVs since November 2005
- There are no labour disputes that are not being resolved through an agreed process
- All plantations established since 2005 have been done so in accordance with the applicable laws of the country and that there is no evidence of non-compliance with law in any of the non-certified holdings which has not been declared above

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.2.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p>Company Group/Holding Statement: We have some audit related with RaCP, NPP</p> <p>Auditor Verification: Auditor has verified the supporting evidence of above the company statement. The above statement in accordance with the supporting evidence provided.</p>
2.2.2	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. 	<p>Company Group/Holding Statement: RaCP Progress for Goodhope (Uncertified Units):</p> <p>1. PT Karya Makmur Sejahtera, status RaCP Review for LUCA report (Final Conservation Liability) Nol hectare with required to Submit Remediation Plan to RSPO.</p> <p>2. PT Agro Indomas –East Kalimantan, status RaCP Review for LUCA report with Final Conservation Liability 1,246,29 ha. Goodhope submit request in 19 dec 2016 to Panel to relook the decision by submit new evidence/document to show that Agro Indomas-East Kalimantan have FCL Nol Hectare.</p> <p>3. Some PT's Not Applicable to Submit LUCA report due to HCV Assessment was Conduct before Land Clearing activities. We just submit Disclosure Form to RACP: PT Sumber Hasil Prima, PT Sinar Sawit Andalan, PT Agrajaya Baktitama, PT Batu Mas Sejahtera, PT Sawit Makmur Sejahtera, PT Nabire Baru, PT Sariwana Adi perkasa, PT Agro Bina Lestari, PT Agro Surya Mandiri.</p>

		<p>Auditor Verification:</p> <p>1. PT Karya Makmur Sejahtera The latest information from RSPO Compensation Executive dated 21 June 2016. The recommendations is:</p> <ol style="list-style-type: none"> Clarify the above findings Submit .shp file for potential remediation areas (river.shp files, soil survey .shp files). The company was processing this recommendation. <p>2. PT Agro Indomas-East Kalimantan Based on email from RSPO Compensation Executive dated 28 November 2016; the Liability of PT Agro Indomas Central Kalimantan: 0, PT Agro Indomas East Kalimantan with Forest Conservation Liability is 1,246.29 Ha.</p> <p>The company was objection to the result of RSPO review, then the company was sent email dated 29 November 2016 to RSPO. Based on RSPO email dated 15 June 2016, reviewer at the time was rejected the clarification of the company. Currently is the process of preparation for a more bracing justification to convince the panel that there is no liability (0). Then the company was sent justification to RSPO dated 19 December 2016 and the RSPO was response dated 22 December 2016 with answer is this justification will be gift to the reviewer.</p> <p>3. Submit LUCA report: All of companies has conduct identification of HCV and SIA before land clearing, so the companies was no obligation to reporting liability and disclosure to the RSPO. There are informations:</p> <ol style="list-style-type: none"> PT Sumber Hasil Prima (HCV&SIA was conducted on September 2010). PT Sinar Sawit Andalan (HCV&SIA was conducted on September 2010). PT Agrajaya Baktitama (HCV&SIA was conducted on January 2010). PT Batu Mas Sejahtera (HCV&SIA was conducted on January 2010). PT Sawit Makmur Sejahtera (HCV&SIA was conducted on January 2010). PT Sariwana Adi Perkasa (HCV&SIA was conducted on January 2011). PT Agro Bina Lestari (HCV&SIA was conducted on December 2014). <p>Auditor Verification on October 2018:</p>
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		Status of HCV assessments on the HCVRN website for satisfactory PT Nabire, PT Sariwana Adi Perkasa (satisfactory), PT Agrajaya Baktitama (satisfactory), PT Batumas Sejahtera (satisfactory), PT Sawit Makmur Sekahtera (satisfactory), PT Sumber Hasil Prima (under review), PT Sinar Sawit Andalan (under review).
2.2.3	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>Company Group/Holding Statement:</p> <p>1. Some PT's already Posting NPP on the RSPO website are: PT Karya Makmur Sejahtera, PT Agro Indomas (East Kalimantan), PT Nabire Baru.</p> <p>2. Some PT's was conducted NPP Notification Audit, but the report under review by RSPO and not yet posting on the website: PT Sariwana Adi Perkasa, PT Sumber Hasil Prima, PT Sinar Sawit Andalan, PT Agrajaya Baktitama, PT Batu Mas Sejahtera, PT Sawit Makmur Sejahtera.</p> <p>3. Two PT's was conducted Notification Audit, but still review by CB and Not yet submit to RSPO: PT Agro Bina Lestari and PT Agro Surya Mandiri</p> <p>Auditor Verification:</p> <ol style="list-style-type: none"> 1. PT KMS was conducted NPP Desk Study on January 2015. The notification was posted on 2016 by BSI. 2. PT Nabire Baru was conducted on 4 September 2015 by BSI. 3. PT Sumber Hasil Prima and PT Sinar Sawit Andalan was conducted NPP Desk Study on 4 September 2015 by BSI. 4. PT Sariwana Adi Perkasa is waiting review for HCV report by HCV-RN. 5. PT Agrajaya Baktitama, PT Batu Mas Sejahtera and PT Sawit Makmur Sejahtera was conducted NPP Desk Study on September 2015. It still waiting HCV report review from HCV-RN. 6. PT Agro Bina Lestari and PT Agro Surya Mandiri has been verified by BSI on April 2016. However the report is still reviewed by CB.
2.2.4	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>Company Group/Holding Statement:</p> <ol style="list-style-type: none"> 1. PT Sumber Hasil Prima/PT Sinar sawit Andalan: Status Box G: Close for Monitoring 2. PT Nabire Baru, with the status of Complaint Box C: Panel Convened <p>Auditor Verification:</p> <p>PT Sumber Hasil Prima & PT Sinar Sawit Andalan</p> <p>Complaints from Friends of Borneo dated 21 March 2013, The allegations are PT Sumber</p>

		<p>Hasil Prima and PT Sinar Sawit Handalan has failed to share with the communities effective plans on the development. The companies have also started land clearing works without Hak Guna Usaha. The communities are also disputing the companies right to the lands in the concessions and charging that there has not been a proper FPIC process. The company is also alleged to have used child labour in developing the plantations.</p> <p>Nabire Baru Complaints from Yayasan Pusaka dated 19 April 2016. Allegations:</p> <ol style="list-style-type: none"> 1. Deforestation and plantings on peatlands 2. Irregularities including development without EIA 3. Sima Village within PT Nabire Baru concessions are suffered from severe flooding 4. Failure in following proper FPIC process 5. Excessive use of force including of state security forces <p>Auditor has verified the supporting evidence of above the company statement. The above statement in accordance with the supporting evidence provided.</p>
2.2.5	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	<p>Company Group/Holding Statement: No</p> <p>Auditor Verification: Auditor has verified the supporting evidence of above the company statement. The above statement in accordance with the supporting evidence provided.</p>
2.2.6	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	<p>Company Group/Holding Statement: Yes</p> <p>Auditor Verification October 2018:</p> <ol style="list-style-type: none"> 1. PT. Agro Bina Lestari (ABL): Land legality compliance still same with NPP notification of PT. Agro Bina Lestari that reported on 29 April 2016. NPP assessment conducted by BSI. 2. PT. Agro Surya Mandiri (ASM): Land legality compliance still same with NPP notification of PT. Agro Surya Mandiri that reported on 29 April 2016. NPP assessment conducted by BSI. 3. PT. Agro Indomas East Kalimantan (AIEK): Land legality compliance still same with NPP notification of PT. Agro Indomas East

		<p>Kalimantan that reported on 16 June 2016. NPP assessment conducted by BSI.</p> <ol style="list-style-type: none"> 4. PT. Karya Makmur Sejahtera (KMS): Land legality compliance still same with NPP notification of PT. Karya Makmur Sejahtera that reported on 3 May 2016. NPP assessment conducted by BSI. 5. PT. Nabire Baru (NB): Land legality compliance still same with NPP notification of PT. Nabire Baru that reported on 9 March 2017. NPP assessment conducted by BSI. 6. PT. Sariwana Adi Perkasa (SAP): Land legality compliance still same with last draft NPP notification of PT. Sariwana Adi Perkasa that reported on 9 March 2017. NPP assessment conducted by BSI. 7. PT. Sumber Hasil Prima (SAP): Has have cadastral map no. 06/2018 on 23 April 2018 8. PT. Sinar Sawit Andalan (SSA): Has have cadastral map no. 09/2018 on 02 May 2018. 9. PT. Agrajaya Baktitama (AJB): has held a committee meeting B on September 13, 2017 with minutes No. 48/HGU-HHP/BPN/2017 10. PT. Batu Mas Sejahtera (BMS): there has been an Audit Notification Letter from Committee B (BPN) No. 2740 / 002-8 / 61 / XII / 2017 dated December 5, 2017 for PT Batu Mas Sejahtera 11. PT. Sawit Makmur Sejahtera (SMS): has held a committee meeting B on September 13, 2017 with minutes No. 49 / HGU-HHP / BPN / 2017.
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3.5 Identification of Findings, Corrective Action, Observations, Opportunity for Improvement and Noteworthy Positive Components.
3.5.1. Identification of Findings, Corrective Actions and Observations at ASA 3

NCR No.	:	2018.01	Issued by	:	Asystasya Aishah Silalahi
Date Issued	:	19 October 2018	Time Limit	:	ASA 4
NC Grade	:	Minor	Date of Closing	:	02 November 2018
Standard Ref. & Requirement	:	1.1.1 There should be a list of information related to criteria 1.2 that can be accessed by relevant stakeholders.			
Evidence observed (filled by auditor): 1. There was a traffic accident between the PT Agro Bukit school bus and an FFB transport truck on September 6, 2018. The school bus driver was an employee of PT Agro Bukit. 2. Based on interview with the Kalimantan Tengah Manpower Supervisory Agency, it is known that the company has not yet conducted work accident reporting					
Non-Conformance Description (filled by auditor): Based on explanation above, certificate holder has not provided information in the form of work accident reports to stakeholders.					
Root Cause Analysis (filled by organization audited): Person in charge did not understand that bus accident that occur outside PT Agro Bukit is part of work accident.					
Correction (filled by organization audited): Re-report work accident data by adding bus accident data					
Corrective Action (filled by organization audited): Ensure that all work accident is reported to related agency and to ascertain it, work accident report must be checked or approved by company's doctor before it sent to agency. (PIC: EHS & Company doctor, Oct 25, 2018)					
Assessor Evaluation and Conclusion (filled by auditor): Verification October 25, 2018 Certificate holder showed correction evidence as such: <ul style="list-style-type: none"> - OHS report receipts period of July – September 2018 to Kantor UPT Balai Pengawasan Ketenagakerjaan Sampit on October 23, 2018. - Delivery report of OHS Committee report period of July – September 2018 to Manpower and Transmigration Agency of Kalimantan Tengah Province on October 25 2018 by Royal Express Indonesia. - OHS Committee Report period of July – September 2018 which list work accident in PT Agro Bukit. Work accident on September 6, 2018 has been include in the report. 					
Verification November 2, 2018 Certificate holder showed list of attendees of training and socialization concerning work accident report (OHS) on October 29, 2018 attended by 2 EHS officer. Based on the correction evidence, Non Conformity No 2018. 01 is closed .					
Verified by	:	Asystasya Aishah Silalahi			

NCR No.	: 2018.02	Issued by	: Satria Adi Putra
Date Issued	: 19 October 2018	Time Limit	: 18 January 2019
NC Grade	: Major	Date of Closing	: 28 November 2018
Standard Ref. & Requirement	: 2.1.1 Proof of compliance with relevant laws and regulations must be available.		
Evidence observed (filled by auditor): Based on the results of interviews and document studies in Sungai Binti POM it is known that the sterilizer operator does not yet have a Pressure Vessel Operation License (SIO).			
Non-Conformance Description (filled by auditor): The company has not been able to show evidence that the sterilizer operator has an Operating Permit in accordance with <i>Permenaker</i> No. 37 of 2016.			
Root Cause Analysis (filled by organization audited): In the August 2018 internal audit, this was identified and the relevant department had been submitted to the training center. However, the available schedule of PJK3 is November 2018.			
Correction (filled by organization audited): <ol style="list-style-type: none"> 1. Re-enroll employees who do not have SIO 2. Registering and SIO training in accordance with a predetermined schedule 			
Corrective Action (filled by organization audited): In the "Employee request form" it is stated that it must have SIO for employees who will be placed in sterilizers, boilers & heavy equipment operators. (PIC: HRD, Nov 30, 2018)			
Assessor Evaluation and Conclusion (filled by auditor): November 28, 2018 The company shows proof of improvement, including: <ul style="list-style-type: none"> • Proof of registration of SIO training to PJK3 (PT Daya Cipta Sinergi) dated 30 October 2018 for 4 sterilizer operators and 2 boiler operators. Implementation of the training will be further verified in the next assessment. • Employment Requisition Form which explains that the requirements for boiler operator positions, sterilizer operators and heavy equipment operators must be equipped with an Operator License. Based on this explanation, this non-conformity can be stated as fulfilled and will be observed again in the next assessment.			
Verified by	: Satria Adi Putra		

NCR No.	: 2018.03	Issued by	: Satria Adi Putra
Date Issued	: 19 October 2018	Time Limit	: 18 January 2019

NC Grade	: Major	Date of Closing	: 17 December 2018
Standard Ref. & Requirement	4.1.1 Estate SOPs must be available (starting from Land Opening to harvesting) and Factory SOPs (starting from FFB receipts to CPO & PKO shipments).		
Evidence observed (filled by auditor): <ol style="list-style-type: none"> Based on the results of interviews in Blok G9 / 10, Division 1, Sawahan Estate it was found that there were damage working tools such as ropes / straps that were modified, leaks in work tools and congestion in the pumping system. Related to this, workers stated that work tools have been maintained but are often constrained by spare parts stocks that are not available. (Based on the EHS procedure document study on Spraying Activities (No. SOP.PLT.SPR-01) dated May 4, 2015 stated that "make sure the cap and nozzle are in good condition (not leaking or plugging)"). Based on the results of a visit to Blok D34, Division 3 Sungai Binti Estate (area POME bed), it is known that there is a midrib arrangement in the middle of the harvesting path. (Based on the review of the Separate Pruning Procedure document dated September 1, 2010 point 25 stated that "if the block has POME beds avoiding the flat beds and avoiding the flat beds and palm circles). 			
Non-Conformance Description (filled by auditor): The company has not been able to show that the realization of work is in accordance with the procedures it has.			
Root Cause Analysis (filled by organization audited): The control system for implementing SOPs is still weak			
Correction (filled by organization audited): <ol style="list-style-type: none"> Request the estate / relevant department to immediately replace the damaged spray working tool and ensure that the midrib arrangement is appropriate Re-socialize related work tool repair SOPs and midrib compilation SOPs Monitoring every month related to the condition of the spray work tool (refer to EHS checklist) (PIC: PM/Agronomy/EHS: Oct 31, 2018)			
Corrective Action (filled by organization audited): Appoint Agronomy manager to be involved in the sustainability audit conducted every 6 (six) months to help ensure that agronomy SOPs have been implemented (PIC: EHS: Oct 31, 2018)			
Assessor Evaluation and Conclusion (filled by auditor): December 13, 2018 The company shows proof of improvement including: <ul style="list-style-type: none"> Evidence of dissemination of midribs in the POME area to 11 harvesters on 3 December 2018 EHS Inspection Checklist carried out in October 2018 in which there is a clause for checking stamp and nozzle. The internal audit schedule that will be conducted in February 2019 with audit criteria including company procedures. However, there is no evidence related to the repair of spray work tools. Based on this explanation, this non-conformity is stated to have not been fulfilled.			
December 17, 2018 The company shows proof of handover of the new Knapsack replacement on 30 October 2018 with a total of 5			

units to spraying workers in Sawahan Estate.

Based on these explanations, this non-conformity is stated to be fulfilled

Verified by : **Satria Adi Putra**

NCR No.	: 2018.04	Issued by	: Satria Adi Putra
Date Issued	: 19 October 2018	Time Limit	: 18 January 2019
NC Grade	: Major	Date of Closing	: 13 December 2018
Standard Ref. & Requirement	: 4.7.2 Risk assessment must be available, documented and there is a record of implementation.		
Evidence observed (filled by auditor): <ol style="list-style-type: none"> Based on the document review of the Risk & Environment Impact Assessment Register revised April 1, 2018, it is known that not all activities that have potential hazard aspects are identified and are listed, among others, waste transportation activities, harvesting activities under electricity and transport activities of school children. In addition, the company has not included related habits / habits in the Risk & Environment Impact Assessment Register document owned by the company. Based on a field visit to the G9 / 10 Division 1 Block, Sawahan Estate found that there were workers who put their sleeves into rubber gloves that were used, put pants into boots and use aprons that did not cover boots. In addition, the EHS procedure document study on Spraying Activities (No. SOP.PLT.SPR-01) dated 04 May 2015 revealed that in the photo attachment it was shown that the standard for wearing clothes and pants was put into PPE (gloves and shoes). Based on the results of field visits in Sungai Binti POM it is known that there are still safety signs / warnings that are not yet available, among others, in areas that have slip potential (clarifier station), fall (press station) and pinched (loading ramp station). In addition there is no safety line in the factory work area. (Based on the document Risk & Environment Impact Assessment Register revised April 1, 2018, it is known that control of potential hazards at each station is carried out by installing a safety sign / warning). Based on the results of a visit to the PT Agro Bukit polyclinic it is known that there is no infectious waste symbol in the temporary storage area. 			
Non-Conformance Description (filled by auditor): The company has not been able to show that all operational activities are available for risk assessment, documented and there are records of implementation			
Root Cause Analysis (filled by organization audited): There is insufficient understanding regarding how to identify hazards and how to control hazards.			
Correction (filled by organization audited): <ol style="list-style-type: none"> Conduct hazard identification, risk assessment and determining control training Revise the HIRADC document by adding activities that have not been included Disseminating how to use hazardous material and schedule waste symbols and how to use PPE and how to not put the sleeves and pants in the PPE Install hazard symbols / hazardous waste symbols that are needed both for the mill, clinic and other departments (PIC: EHS/MILL/Clinic: Oct 31, 2018)			

Corrective Action (filled by organization audited):

Revise spraying SOPs by including appropriate sample images and incorporating habit factors in risk assessment (PIC: EHS, Nov 10, 2018)

Assessor Evaluation and Conclusion (filled by auditor):

Verification November 02 2018

Point 3

Companies have shown evidence including:

- Installation of warning (watch out for falling) at the Clarifier station
- Announcement of warning (beware of pinching and falling) at the Press station
- Installation of warning (beware of pinching) at the Ramp Loading station
- Making safety lines at the Sungai Binti POM factory area

Based on the evidence of improvement provided, the company still needs to provide proof of improvement for nonconformities in point 1, point 2 and point 4 and answer the auditor's response on October 26, 2018 regarding preventive actions related to HIRAC and Hazard / Waste Symbols. Regarding the above, non-conformity No. 2018.04 is not fulfilled.

November 28, 2018

The company shows proof of improvement, including:

- The company showed a revision of HIRAC on November 26, 2018 which has included the activities of garbage transportation activities, harvesting / pruning activities under electricity and transport activities of school children.
- The company shows evidence of socialization regarding the use of PPE, management of B3 and Domestic waste to spray workers for example on the Sungai Lenggana Estate conducted on October 24, 2018 to 11 workers.

But the company has not shown:

- Proof of improvement for the installation of infectious symbols in the PT Agro Bukit clinic
- Proof of HIRAC approval by the Head of EHS
- Minutes of socializing the use of PPE and photo evidence on how to use PPE in the spraying section
- EHS inspection checklist form that has entered the hazard symbol and symbol LB3

Based on this explanation, this non-conformity is stated to have not been fulfilled

December 13, 2018

The company has shown proof of improvement including:

- Documentation of installation of infectious symbols in the clinic
- Proof of HIRAC that has been approved by the Head of EHS
- Proof of socialization and photos of using PPE, note that clothes and pants have been removed from gloves and shoes
- EHS Inspection Checklist for the October 2018 period in which there is already a clause related to ascertaining the schedule waste symbol

Based on these explanations, this non-conformity is stated to be fulfilled

Verified by : **Satria Adi Putra & Muhammad Rinaldi**

NCR No.	: 2018.05	Issued by	: Satria Adi Putra
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Date Issued	: 19 October 2018	Time Limit	: 18 January 2019
NC Grade	: Major	Date of Closing	: 13 December 2018
Standard Ref. & Requirement	4.7.3 Records of training in Occupational Safety and Health (K3) programs (see 4.8) and Personal Protective Equipment (PPE) in accordance with the results of hazard identification and risk analysis must be available to all workers.		
Evidence observed (filled by auditor): <ol style="list-style-type: none">Based on the review of the PPE SOP document No SOP.EHS.APD-01 dated May 4, 2015 which states that damaged or expired PPE must be replaced.Based on the results of the field visit it is known that<ul style="list-style-type: none">In the spray activity in Division 1 SLE it was found that PPE in the form of shoes was damaged (2 units).In fertilizing activities in Block G22 Division 1 SLE, it is known that PPE in the form of masks is not in accordance with the standards provided by the company.Based on the results of interviews with empty bare labor (SBE), fertilization (SLE), harvesting (Sungai Binti) it is known that PPE is purchased independently.Form documents Examination and Use of Personal Protective Equipment, it is known that checking only requires "used and not used".			
Non-Conformance Description (filled by auditor): <p>The company has not been able to implement and show methods / mechanisms related to checking, using and replacing PPE</p>			
Root Cause Analysis (filled by organization audited): <p>Understanding of the type of PPE, the lifetime of PPE and the procedure for requesting PPE is still not well understood by employees and foremen</p>			
Correction (filled by organization audited) <ol style="list-style-type: none">Conduct socialization regarding the types of PPE needed for each work activity, how to use and procedures for requesting PPEEnsure that employees understand related to the SMS center number to submit complaints or unsafe actions, unsafe conditions and nearmiss including complaints regarding PPE problems <p>(PIC: EM/EHS, Oct 31, 2018)</p>			
Corrective Action (filled by organization audited): <p>Revise the PPE checklist by adding the condition of PPE (damaged / good)</p> <p>(PIC: EHS, Oct 31, 2018)</p>			
Assessor Evaluation and Conclusion (filled by auditor): <p>November 28, 2018</p> <p>The company showed outreach related to PPE on October 24, 2018 to 11 spraying workers and to 32 fertilizing workers.</p> <p>But the company has not shown proof:</p> <ul style="list-style-type: none">Minutes of socializing the use of PPECheck the revised PPE examination			

Based on this explanation, this non-conformity is stated to have not been fulfilled

December 13, 2018

Company shows proof:

- The company shows socialization related to PPE on October 24, 2018 to 11 spraying workers and 32 fertilizing workers.
- Checklist of PPE Examination Form No. SOP.EHS.APD-01.F-01 which contains information for monitoring the condition of PPE.

Based on these explanations, this non-conformity is stated to be fulfilled

Verified by : Satria Adi Putra & Muhammad Rinaldi

NCR No.	: 2018.06	Issued by	: Satria Adi Putra
Date Issued	: 19 October 2018	Time Limit	: ASA-4
NC Grade	: Minor	Date of Closing	: 27 December 2018
Standard Ref. & Requirement	: 4.8.2 Training records for each worker must be maintained.		
<p>Evidence observed <i>(filled by auditor):</i> Based on the results of interviews in the Sungai Binti Estate, Sungai Lenggana Estate and Sungai Binti Mill Housing, it was found that employees and contractor workers did not understand the emergency response system, handling schedule waste and handling domestic waste.</p> <p>Non-Conformance Description <i>(filled by auditor):</i> The company has not been able to show training records for all contractors related to the RSPO P & C as well as monitors of training effectiveness.</p> <p>Root Cause Analysis <i>(filled by organization audited):</i> Checklist of safety induction delivered to contractors is still generally and has not specifically included more detailed items such as hazardous waste management, hazardous material management, domestic waste management, complaints and emergency response</p> <p>Correction <i>(filled by organization audited):</i></p> <ol style="list-style-type: none"> 1. To socialize with contractors regarding emergency response procedures, SOP for hazardous waste management, SOP of complaints, Hazardous material handling, domestic waste management & RSPO PC 2. Conduct routine monitoring related to contractor activities and their residence so that they are in accordance with PT Agro Bukit's HSE standards <p>(PIC: EHS dept, Oct 31, 2018)</p> <p>Corrective Action <i>(filled by organization audited):</i></p>			

<ol style="list-style-type: none"> 1. Add to the contractor's induction checklist the point about emergency response procedures, management of hazardous waste, hazardous material, complaints procedure, domestic waste management and RSPO PC 2. Provide training evaluation / briefing documents to ensure that the material has well understood <p>(PIC: HRD dept, Oct 31, 2018)</p>
<p>Assessor Evaluation and Conclusion <i>(filled by auditor):</i> 26 December 2018 The company has shown evidence of improvements including:</p> <ul style="list-style-type: none"> - Records of EHS Briefing - For Employee, Contractor and Visitor dated October 29, 2018 to the Contractor and attended by 4 contractors. Socialization containing Occupational Health and Safety, Environmental and Social Policy, aspects and impacts of work environment, hazards and occupational risks, emergency response (accident, fire, spill), work administration (SOP, Work Permit), personal protective equipment, HCV, RSPO, Hazardous Waste Management, Domestic Waste Management and Complaints SOPs - Induction Form - Evaluation form related to briefing and training material to contractors <p>Based on the evidence of the improvement provided, the non-conformity No. 2018.06 is stated fulfilled.</p> <p>Verified by : Satria Adi Putra</p>

NCR No.	: 2018.07	Issued by	: Brigitta Prita
Date Issued	: 19 October 2018	Time Limit	: ASA-4
NC Grade	: Minor	Date of Closing	: 26 December 2018
Standard Ref. & Requirement	: 5.1.2 An environmental management plan document must be available to prevent negative impacts and reports on its implementation and revision if there are identified impacts that must change the company's ongoing activities. Company management must appoint the person in charge of implementing the environmental management plan activities.		
<p>Evidence observed <i>(filled by auditor):</i> The results of field observations revealed that the oil drum packaging was stored in the Sungai Binti Mill (Contractor Housing) and that the paint packaging was stored in the Contractor Housing of Sawahan Estate.</p> <p>Non-Conformance Description <i>(filled by auditor):</i> The company cannot yet ensure that these activities do not negatively impact or pollute the environment.</p>			
<p>Root Cause Analysis <i>(filled by organization audited):</i> There is insufficient understanding regarding how to identify hazards and how to control hazards.</p>			
<p>Correction <i>(filled by organization audited):</i></p> <ol style="list-style-type: none"> 1. Ensure that hazard risk assessments have been carried out for every activity in PT Agro Bukit including the storage of oil drums and paint packages stored in the contractor's house 2. Place all hazardous waste in the temporary hazardous waste storage on CWS warehouse (which is licensed) <p>PIC: HoD/EHS: Oct 31, 2018</p>			

Corrective Action (filled by organization audited):

1. Conduct socialization regarding how to identify hazards and how to control them to contractors
2. Conduct regular control systems for contractor activities to remain standard with PT Agro Bukit EHS SOPs

(PIC: EHS dept, Nov 10, 2018)
Assessor Evaluation and Conclusion (filled by auditor):

9 December 2018.

The company shows the oil drum and paint packaging that has been moved into the hazardous waste temporary storage, but has not been explained in detail regarding the date of shipment, the amount of packaging and proof of delivery. **So this non-conformity has not been fulfilled.**

26 December 2018.

The company shows the minutes of hazardous waste handover dated October 11-12, 2018 to hazardous waste temporary storage on Central Workshop with details:

- 6 unit of used oil drums.
- 36 kg of used paint cans as many as 36 unit.
- 5 unit of large paint cans
- 3 unit of paint rollers.

There is facility inspection checklist at the Contractor's housing that conducted on 8 September 2018 by the EHS inspector / EHS Department.

Based on the explanation above, **this non-conformity is stated fulfilled and observations will be made during the next surveillance.**

Field observation at ASA 4 :

There was no hazardous waste in contractor housing, because has been delivered to hazardous temporary warehouse.

Verified by : Brigitta Prita

NCR No.	: 2018.08	Issued by	: Brigitta Prita & Radytio Puspanjana.
Date Issued	: 19 October 2018	Time Limit	: ASA-4
NC Grade	: Minor	Date of Closing	: 09 August 2019
Standard Ref. & Requirement	: 5.3.3 A documented and implemented waste management plan must be available to avoid and reduce pollution.		
Evidence observed (filled by auditor):			
The results of field observations are known:			
<ul style="list-style-type: none">There is mixing of waste between organic and inorganic waste. Domestic waste disposed in the back and front of the housing is located in Sungai Binti Mill Housing, Sungai Binti Estate, Sungai Lenggana Estate,			

Sawahan Estate and Tanah Putih Estate.

- The existence of scattered domestic (inorganic & organic) waste in Workers' Housing.
- The use of shell oil for water storage behind the Sungai Binti Mill Contractor Housing.
- Chemical spills and spills in the spraying of G9 / 10 Sawahan Estate blocks.
- There are spills of oil and fuel in the housing contractor of the Sungai Binti.
- The existence of paint packaging and spills in the Contractor's Housing, housing unit No. W 20 Tanah Putih Estate & Sawahan Estate.
- The presence of domestic waste water is discharged into the water stream towards the Anak Sungai Lenggana in Sawahan & Tanah Putih Estate Housing.

Non-Conformance Description (filled by auditor):

This is not in accordance with the SOP regarding waste management with the document number SOP. EHS. LIM-01 For example;

- In point 4.6, domestic waste produced by housing must be sorted between organic (paper, food and wood) and inorganic waste (plastic, bottles & cans) and estate facilitating separate trash bins according to their type in each housing.
- In point 4.3, the oil packaging is stored at hazardous storage and sent to the collector.
- In point 4.3, household liquid waste (non hazardous waste) is flowed into oil and sediment traps before being released into the environment.

Root Cause Analysis (filled by organization audited):

Understanding & application is still very minimal in relation to the SOP for domestic waste / waste management

Correction (filled by organization audited):

1. Conduct socialization regarding domestic waste management, hazardous waste and domestic liquid waste to all employees.
2. Build an oil trap / sediment trap on the emplacement water channel to prevent oil or sediment from being carried into the surrounding environment.

PIC: HoD/EHS, Oct 31, 2018

Corrective Action (filled by organization audited):

Routinely monitor once a month related to the implementation of domestic waste / waste management SOPs

PIC: HoD/EHS, Nov 10, 2018

Assessor Evaluation and Conclusion (filled by auditor):
Verification, December 9, 2018.

The company shows proof of improvement such as documentary evidence of photos of drains for domestic waste but has not been shown proof of improvement for other non-conformity points. So this is stated to have not been fulfilled.

Verification, December 27, 2018.

The company shows the minutes of handover of hazardous waste on 11 & 12 October 2018 with the following details:

- Used oil as much as 600 liters.
- Filters as many as 4 pairs.
- 1 pair of used buckets.
- 1 pair of used water jerry cans.
- 6 pairs of used oil drums.
- Used 2 drums of oil.

- Filter as many as 1 pair.
- Used Nalco buckets of 5 pairs.
- 4 pairs of coolant radiators.
- 4 pairs of oil jerry cans.
- 1 kg of used paint can.
- 5 pairs of large paint cans.
- Large 3 pairs of paint rollers.

Based on the explanation above, the company has not shown other proofs of improvement in accordance with identified non-conformities such as: mixing waste between organic & inorganic; domestic waste spillage; use of oil drums; spilled & spilled clam ingredients; oil & fuel. So this is stated to have not been fulfilled.

Verification 9 August 2019

- Mixing of domestic waste organic & inorganic: based on visits on TPE & SWE housing complex, known there are organic and inorganic domestic waste bin in each housing complex.
- Domestic waste spills: based on visits on TPE & SWE housing complex, known that there are sediment trap & oil trap for domestic sewerage on house number W19 block H8, (SWE & TPE) and house number W14 block H34.
- There are chemical spill: lubricant & fuel, the company shown documentation consist of socialization of parking control for the contractor unit and oil trap for contractor unit transportation
- The use of used lubricant drums for fresh water container on housing complex. The evidence for improvement consist of:
 - Socialization related to PPE, OHS and domestic waste and hazardous waste management October 24, 2018 in Sungai Lenggana Estate block J33 / J34 for 44 workers, related to use of used lubricant drums still becomes NC on ASA-4 Audit (NC number 2019.05) for indicator 6.5.3.
 - There is a monthly EHS Inspection (monthly environmental and OHS inspection checklist) on TPE housing complex conducted by EHS Inspector September 8, 2018 on TPE housing complex, based inspection results no hazardous waste on TPE housing waste used for fresh water container.
 - For use of used lubricant drums for fresh water container on housing complex, still becomes NC on ASA-4 Audit (NC number 2019.05) for indicator 6.5.3.

Based on evidence submitted NC number 2018.08 declared is comply.

Verified by : **Brigitta Prita / Radytio Puspanjana**

NCR No.	:	2018.09	Issued by	:	Asystasya Aishah Silalahi
Date Issued	:	19 October 2018	Time Limit	:	18 January 2019
NC Grade	:	MAJOR	Date of Closing	:	17 December 2018
Standard Ref. & Requirement	:	6.3.1 Mechanisms that are open to all affected parties, must resolve disputes in the right, timely and effective manner, and ensure the anonymity of whistleblowers and whistleblowers, if requested, provided that the report is supported by sufficient initial evidence.			
Evidence observed (filled by auditor):					
1. The company has Procedure No IMS.P-05 concerning Communication, Participation and Consultation which explains the mechanism for handling communication and handling complaints from external and internal stakeholders. Based on the procedure, internal complaints can be conveyed personally to superiors, public					

<p>spaces, and delivered at P2K3 meetings, women's committees, Bipartite, and so on. External complaints can be submitted to the relevant department according to the type of complaint.</p> <ol style="list-style-type: none"> 2. CH has socialized complaint mechanism, for example to Tanah Putih Estate worker on October 7, 2018 and local contractor on March 1, 2018. 3. Based on interview with workers in Sungai Binti, Sungai Lenggana, Sawahan, and Tanah Putih Estate, and local contractor, it is known that few workers still not fully understand the complaint mechanism.
<p>Non-Conformance Description (filled by auditor):</p> <p>Based on explanation above, CH could not showed the effectiveness of complaint and grievance handling procedure socialization.</p>
<p>Root Cause Analysis (filled by organization audited):</p> <p>Worker and contractor understanding about complaint mechanism is still minimal.</p>
<p>Correction (filled by organization audited):</p> <p>HRD to provide training material of Complaint Procedure for worker and contractor.</p> <p>PIC: HRD, Oct 25, 2018</p>
<p>Corrective Action (filled by organization audited):</p> <ol style="list-style-type: none"> 1. Re-socialize complain handling procedure to workers and contractors. 2. Make evaluation form for participants on the training material presented. <p>PIC: HRD, Nov 10, 2018</p>
<p>Assessor Evaluation and Conclusion (filled by auditor):</p> <p>Verification December 10, 2018</p> <p>The company has provided proof of improvement in the form of material for socialization regarding complaints handling. The socialization was held on October 20, 2018 which was attended by 40 employees from Sungai Binti Estate. However, please show an example of the evaluation of participants' understanding regarding the SOP for Handling Complaints Handling Employees. Related to this, the discrepancies have still not been fulfilled.</p> <p>December 17, 2018</p> <p>The company shows the Training Evaluation Form with Complaints SOP Material for example to Surihati from Sungai Binti Estate on November 20, 2018.</p> <p>Based on these explanations, this non-conformity is stated to be fulfilled</p>
<p>Verified by : Asystasya Aishah Silalahi</p>

NCR No.	: 2018.10	Issued by	: Asystasya Aishah Silalahi
Date Issued	: 19 October 2018	Time Limit	: 18 January 2019

NC Grade	:	MAJOR	Date of Closing	:	17 December 2018
Standard Ref. & Requirement	:	6.3.2 Records of processes and results of handling disputes must be available			
Evidence observed (filled by auditor): <p>CH has Media Response Procedure No Doc CSR11 which explains about mechanism for handling communication, issue, or complaint from mass media. The procedure states that article in mass media will be reviewed, make the action plan, chronology report, review report, and arrange meeting with related party and make final report.</p> <p>There is some issues from mass media (online news) about PT Agro Bukit. Based on interview with management representative and document verification, CH could not show the document to resolve the issue.</p>					
Non-Conformance Description (filled by auditor): <p>Based on explanation above, CH has not shown yet documentation of process of issue or complaint handling from mass media.</p>					
Root Cause Analysis (filled by organization audited): <p>There is no person in charge assigned to responds complaint via mass media.</p>					
Correction (filled by organization audited): <p>Determine the person in charge to handling complaint from mass media.</p>					
Corrective Action (filled by organization audited): <p>Ensure SOP of Media Response is implemented, documented well and available when needed.</p>					
PIC: Pak Aditya (Nov 30, 2018)					
Assessor Evaluation and Conclusion (filled by auditor): November 28, 2018 <p>The company shows documentation and resolution of issues from the media in the form "Document of Publication on Media" No. 01 / CSR / VIII / 10 / Media explaining responses to media issues from Replubika.co.id dated May 5, 2014 regarding "Agro Bukit Plantation Companies Reported to KPK".</p> <p>But the company has not been able to show proof:</p> <ul style="list-style-type: none"> • Documentation and responses to media issues that have occurred in the past year (the issue of school bus accidents and the issue of severance payments for laid-off workers) • Determination of the person responsible for handling issues that arise from the mass media. <p>Based on this explanation, this discrepancy is stated to have not been fulfilled.</p>					
December 17, 2018 <p>The company shows proof of improvement, including:</p> <ul style="list-style-type: none"> • Documentation of Publication on Media No. 01 / CSR / VIII / 18 / Media dated September 6, 2018 which explains the documentation and responses to issues from the media related to Student Bus Accidents on the way to PT Agro Bukit. • Job Description to Manager-Stakeholder Relations & CSR which explains that one of the tasks is to maintain relations with external parties and handle complaints. 					

Based on these explanations, this non-conformity is stated to be fulfilled.

Verified by : **Asystasya Aishah Silalahi**

NCR No.	: 2018.11	Issued by	: Muhammad Rinaldi
Date Issued	: 19 October 2018	Time Limit	: ASA-4
NC Grade	: Minor	Date of Closing	: 26 December 2019
Standard Ref. & Requirement	6.5.3 Oil palm plantations and mills must provide adequate housing, water supplies, medical needs, education and public facilities that are in accordance with national standards or higher standards, if public facilities are not available or inaccessible.		
Evidence observed (filled by auditor): 1. Based on field visits in the residential areas of SLE / SBE and TPE / SWE, it is known: <ul style="list-style-type: none"> There is 1 house occupied by 8 contractor workers. This is not in accordance with the Internal Memo of the Terms of Use of Company Houses on April 25, 2007 which explained that workers who are still alone will be combined a maximum of 4 people in 1 housing door The drainage behind the housing that is not maintained 2. Based on the employee appointment document review on July 5, 2018, there is a Statement explaining about all medical need / childbirth of his wife and family when the daily paid workers status is personal responsibility			
Non-Conformance Description (filled by auditor): The Company has not been able to show evidence of providing adequate housing and facilities and medical needs to workers.			
Root Cause Analysis (filled by organization audited): 1. The monitoring system for applying memos or SOPs related to emplacement management is still ineffective 2. Lack of understanding regarding employee and family rights as stipulated in government regulations			
Correction (filled by organization audited): 1. Ensure that occupancy is max 4 (four) people in one house for employees / contractors with single status / Not with family 2. Make repairs to the water channel at the emplacement 3. Conducting training related RSPO P&C / worker welfare for all HRD managers of Goodhope 4. Revise employee statements so as not to conflict with applicable regulations			
Corrective Action (filled by organization audited): 1. Revise the emplacement inspection form in order to include the maximum limit of emplacement occupants, namely 4 (four) people with single status 2. Revisit the statement of appointment of temporary worker or permanent workers so as not to conflict with applicable laws and regulations			
Assessor Evaluation and Conclusion (filled by auditor): 10 December 2018			

The company shows proof of improvement including:

1. 1. Internal Memo No. 001 / AB-IM / GMO / XII / 2018 dated December 1, 2018 from HR & GA Manager who explained that the statement relating to "Medical Costs" that contravene the regulations and the force of coercion will be eliminated.
2. Documentation regarding repair of drainage in housing

But the company has not shown:

1. Ensure that emplacement occupancy is max 4 (four) people for employees / contractors with single status / Not with family
2. Conducting socialization related RSPO P&C / worker welfare for all HRD managers of Goodhope
3. Revising the emplacement inspection form in order to include the maximum limit of emplacement occupants is 4 (four) people with single status / Not with family

Based on the explanation above, **this non-conformity has not been fulfilled.**

26 December 2018

The company shows proof of improvement including:

- The company shows the Monthly EHS Inspection Checklist in September, October, November 2018 which includes related to waste management, condition of facilities including drainage till the number of emplacement occupancy in 1 house.
- Information related to worker welfare to the HRD and Sustainability department on December 6, 2018 to 19 staff.

Based on the explanation above, **this non-conformity is stated fulfilled.**

Verified by : **Muhammad Rinaldi**

NCR No.	: 2018.12	Issued by	: Satria Adi Putra
Date Issued	: 19 October 2018	Time Limit	: ASA-4
NC Grade	: Minor	Date of Closing	: 02 November 2018
Standard Ref. & Requirement	6.10.4 The agreed payment must be paid on time.		
Evidence observed (filled by auditor):			
<ul style="list-style-type: none">- Based on a study of the Agreement on Sale and Purchase of Fresh Fruit Bunches (FFB) No. PTAB / C / 316.1 article 5 states that "a hundred percent payment of the price of Fresh Fruit Bunches agreed upon in the month of delivery / delivery of Fresh Fruit Bunches is carried out weekly by means of a transfer system".- Based on the results of the review of invoice document No. 02 / INV-Ali Boto / 06/2018, it is known that during the sales period of 11-22 June 2018, payment was made on 09 July 2018 in accordance with No. Check CM 994802.- Based on the results of interviews with TBS suppliers, it is known that payments are made every month.			
Non-Conformance Description (filled by auditor):			
The company has not been able to prove that FFB payments from third parties are in accordance with the agreed work contract.			
Root Cause Analysis (filled by organization audited):			

The person in charge of purchasing fruit outside has not implemented a payment control system effectively

Correction (filled by organization audited):

Make a control system related to the payment of outside fruit so that it is paid not to exceed the agreed time limit
(PIC: Aswan Tarigan, Oct 31, 2018)

Corrective Action (filled by organization audited):

Carry out monitoring related to the outside fruit payment system so as not to exceed the time limit agreed in the contract

(PIC: Aswan Tarigan/Finance dept, Oct 31, 2018)

Assessor Evaluation and Conclusion (filled by auditor):

Verification 02 November 2018

The company has shown evidence of improvements including:

- BAPP External Crop Purchase No.01 / Ali B / X / 2018 for payments dated October 8-15 2018 for contractors on behalf of Ali Boto
- Invoice No. 01 / INV-Ali Boto / 10/2018 for the payment period of October 8-15 2018 amounting to Rp 56,880,418
- The official report on the list of the Sungai Binti POM scales for the TBS supplier Ali Boto for the period of October 8-15 2018 was 54,308 kg.
- Transaction Document Location for receipt of FFB from supplier Ali Boto from 08-18 October 2018.
- Detail document for TBS receipts for Ali Boto supplier from 08-15 October 2018.
- Transfer and Overbooking Records with No Check CQ-595504 to Ali Boto on October 29, 2018.
- BAPP External Crop Purchase No.04 / Mirah sari / 2018 for payments dated October 8-15 2018 for contractors on behalf of Mirah Sari
- Invoice No. 01 / INV-MS / 10/2018 for the payment period of October 8-15 2018 amounting to Rp 7,295,916
- The official report on the list of POM Sungai Binti scales for Mirah Sari FFB suppliers for the period of October 8-15 2018 was 7,699 kg.
- Transaction Document Location for receipt of FFB from Mirah Sari suppliers for the 08-18 October 2018 period.
- Transfer and Overbooking Records with No Check CQ-595502 to Mirah Sari on 29 October 2018.
- BAPP External Crop Purchase No. 03 / ArnoldX / 2018 for payments from October 8-15 2018 for contractors on behalf of Arnold
- Invoice No. 01 / INV-AR / 10/2018 for the payment period of October 8-15 2018 amounting to Rp 8,386,792
- Document list of the Sungai Binti POM scales on the supplier of Ali Boto TBS for the October 08-15 2018 period of 8,007 kg.
- Transaction Document Location for receiving FFB from suppliers of Arnold R for the period of October 08-18 2018.
- Detail document for FFB receipts for Arnold R suppliers for the period of October 8-15 2018.
- Transfer and Overbooking Records with No Check CQ-595500 to Arnold R dated October 29, 2018.

Based on the proof of repairs that have been sent, the non-conformity No. 2018.12 has been declared fulfilled.

Verified by : **Satria Adi Putra**

NCR No.	: 2018.13	Issued by	: Muhammad Rinaldi
Date Issued	: 19 October 2018	Time Limit	: 18 January 2019
NC Grade	: Major	Date of Closing	: 10 December 2018

Standard Ref. & Requirement	: 6.12.1 There must be evidence of the absence of labor as a result of human trafficking or coercion in any form.
Evidence observed (filled by auditor): 1. Based on interviews with the empty fruit bunch tractor operators on the SBE and Laser workers on SBE, it is known that workers do not have a training certificate that has been followed 2. Based on the Statement Letter when entering work there are several clauses that reduce freedom to workers: <ul style="list-style-type: none"> • Willing to be transferred / transferred to the company one group that has been determined by the company if it violates the statement, the worker is willing to resign without any demand. • Workers who have been proven to consume alcohol and illegal drugs are dismissed without any demands on the company 	
Non-Conformance Description (filled by auditor): The company has not shown evidence that there is no forced work in any form.	
Root Cause Analysis (filled by organization audited): Less understanding of the P & C clause 6.12.1, the absence of labor as a result of human trafficking or coercion in any form.	
Correction (filled by organization audited): 1. Remove or revoke the following unnecessary statements from the requirements when entering work <ol style="list-style-type: none"> a) Willing to be transferred / transferred to a company group that has been determined by the company if it violates the statement, the worker is willing to resign without any demands b) Workers who were proven to consume alcohol and illegal drugs were dismissed without any demands on the company 2. Submit training certificates to tractor and welder operators on Sungai Binti Estate (SBE)	
Corrective Action (filled by organization audited): 1. Conducted employment training & RSPO PC training for all HR managers Goodhope 2. Perform regular control by the person in charge of the training center to ensure that the training certificate has been received by the worker (proven by the certificate receipt)	
Assessor Evaluation and Conclusion (filled by auditor): December 10, 2018 The company shows some evidence of improvement, including: <ul style="list-style-type: none"> • Internal Memo No. 001 / AB-IM / GMO / XII / 2018 dated December 1, 2018 from HR & GA Manager who explained that the statement relating to "Medical Costs" that contravene the regulations and the force of coercion will be eliminated. • Proof of the submission of a OSH / SIO License to 2 tractor operators and 1 welder on November 27, 2018 • Monitoring the Training Certificate on November 27, 2018 which explained that there were 12 Certificates and had been submitted to the workers. Based on these explanations, this non-conformity is stated to be fulfilled.	
Verified by	: Muhammad Rinaldi

NCR No.	: 2018.14	Issued by	: Asystasya Aishah Silalahi
Date Issued	: 19 October 2018	Time Limit	: 18 January 2019

NC Grade	: MAJOR	Date of Closing	: 19 October 2018
Standard Ref. & Requirement	E.3.2 Facilities must have documented procedures for receiving and processing certified and non-certified FFBs.		
Evidence observed (filled by auditor): <ol style="list-style-type: none"> Based on field observation in Sungai Binti and Sungai Lenggana Estate, it is known that there is a stake that distinguish area between RSPO certified and RSPO uncertified. Certificate holder has SOP of Ensuring Traceability of RSPO Certified Products (CPO, PKO, PKE) Version 1, April 2018 Based on document review of Ensuring Traceability of RSPO Certified Products, it is known that certified and non-certified FFB in 1 block is distinguished automatically through percentage set by the company.. 			
Non-Conformance Description (filled by auditor): Based on the explanation above, the procedures do not yet have a mechanism that explains in detail the separation of certified and non-certified FFBs in 1 block.			
Root Cause Analysis (filled by organization audited): There is a misunderstanding that fresh fruit bunches (FFB) in blocks divided between certified and non-certified can use a proportional system			
Correction (filled by organization audited): <ol style="list-style-type: none"> Revise "SOPs traceability" to issue blocks that use a proportional system to become non-certified blocks. Inform the finance manager to issue a block that uses the proportional system to block non certified as a whole 			
Corrective Action (filled by organization audited): <ol style="list-style-type: none"> Socialize Traceability SOPs to related parties (PIC: Saepul, Deadline: 20 Oct 2018) Change the intended block from the "JDE" system (computer system) to non-certified FFB (PIC: IT dept, Deadline: 20 Oct 2018) 			
Assessor Evaluation and Conclusion (filled by auditor): Company showed corrective evidence such as: <ol style="list-style-type: none"> Procedure of Ensuring Traceability of RSPO Certified Products (CPO, PKO, PKE), revision on October 19, 2018. The revision of the is about changing some certified block into noncertified block, such as Block A38, K27, L24, M23, etc. List of attendees and socialization photo of SCCS SOP on October 20, 2018 to 18 staff and worker including PIC who handle the JDE system (Manager Finance). Recording of Certified and Non-Certified FFB dated October 19, 2018 which explains that all FFB production in blocks A38, B38, E37 Sungai Binti Estate and block M23 & M24 Sungai Lenggana Estate is listed as non-certified FFB. Based on document verification of Ensuring Traceability of RSPO Certified Products (CPO, PKO, PKE), revision on October 19, 2018, Non Conformity No 2018. 14 is closed.			

Verified by	: Asystasya Aishah Silalahi
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NCR No.	: 2018.15	Issued by	: Asystasya Aishah Silalahi
Date Issued	: 19 October 2018	Time Limit	: 18 January 2019
NC Grade	: MAJOR	Date of Closing	: 22 October 2018
Standard Ref. & Requirement	: E.4.1 Facilities must verify and document the volume of certified and non-certified FFB received.		
Evidence observed (filled by auditor):			
1. Based on field observation in Sungai Binti and Sungai Lenggana Estate, it is known that there is a stake that distinguish area between RSPO certified and RSPO uncertified.			
2. Based on document review of Ensuring Traceability of RSPO Certified Products, it is known that certified and non-certified FFB in 1 block is distinguished automatically through percentage set by the company. For example, there was RSPO certified and non certified area in Block K27 Sungai Lenggana Estate. FFB production from the area is proportioned to certified FFB.			
Non-Conformance Description (filled by auditor):			
Related to this, company could not verify clearly the distinguishment of certified source from own estate (certified and non certified).			
Root Cause Analysis (filled by organization audited):			
There is a misunderstanding that fresh fruit bunches (FFB) in blocks divided between certified and non-certified can use a proportional system			
Correction (filled by organization audited):			
1. Revise "SOPs treaceability" to issue blocks that use a proportional system to become non-certified blocks.			
2. Inform the finance manager to issue a block that uses the proportional system to block non certified as a whole			
Corrective Action (filled by organization audited):			
1. Socialize Traceability SOPs to related parties (PIC: Saepul, Deadline: 20 Oct 2018)			
2. Change the intended block from the "JDE" system (computer system) to non-certified FFB (PIC: IT dept, Deadline: 20 Oct 2018)			
Assessor Evaluation and Conclusion (filled by auditor):			
Verification 20 October 2018			
Certificate holder showed corrective evidence, such as:			
1. Procedure of Ensuring Traceability of RSPO Certified Products (CPO, PKO, PKE), revision on October 19, 2018. The revision of the is about changing some certified block into noncertified block, such as Block A38, K27, L24, M23, etc.			
2. List of attendees and socialization photo of SCCS SOP on October 20, 2018 to 18 staff and worker including PIC who handle the JDE system (Manager Finance).			

3. Recording of Certified and Non-Certified FFB dated October 19, 2018 which explains that all FFB production in blocks A38, B38, E37 Sungai Binti Estate and block M23 & M24 Sungai Lenggana Estate is listed as non-certified FFB.

22 October 2018

Certificate holder showed RSPO Certified – Noncertified Block Map which explain that there are 23 noncertified blocks, for example Block A38, B38, G33, G34, M23-24, etc. Based on the map, it is known that the blocks which are part of the area are non-certified, the entire block is considered an uncertified block.

Based on explanation above, this **nonconformity is closed and will be observed in next assessment.**

Verification 07 August 2019

Based on field observation and documents verification blocks which are part of the area are non-certified, the entire block is considered an uncertified block and the area statement mentioned as Mature area Partial Block (*Not Claimed area*)) (certified planting area where the FFB production is not claimed as Certified Product)

Verified by	: Asystasya Aishah Silalahi
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3.5.2. Identification of Findings, Corrective Actions and Observations at ASA-4

NCR No.	: 2019.01.	Issued by	: Yudhi Yuniarto Tallutondok
Date Issued	: 9 August 2019	Time Limit	: Next Assessment
NC Grade	: Minor	Date of Closing	: August 26, 2019
Standard Ref. & Requirement	: 2.1.4 A system for tracking any changes in the law shall be		
Evidence observed (filled by auditor): The company has a list of legal requirements contained in the Evaluation of Legal and other Requirement Compliance. There are a total of 247 regulations with all of them fulfilled in accordance with the evaluation of the regulations. However, based on the verification of the document, there are still regulations that have not been included in the list of company regulations, for example but not limited to: <ul style="list-style-type: none"> • Minister of Manpower Regulations No 6 of 2016 concerning Holiday Allowance. • Minister of Manpower Regulations No. 1 of 2017 concerning Wage Structure and Scale. • Minister of Manpower Regulations No. 15 of 2018 concerning Minimum Wages. • Minister of Manpower Regulations No. 4 of 2019 concerning Obligatory Procedures for Reporting Employment in the Network. • Minister of Environment and Forestry Regulation No. P.8/MENLHK/SETJEN/KUM.I/3/2018 concerning the Fixed Procedure for Field Checking Hotspots Information and / or Forest and Land Fires Information. • Minister of Environment and Forestry Regulation No. P.9/MENLHK/SETJEN/KUM.I/3/2018 concerning Technical Criteria for Preparedness and Emergency Status of Forest and Land Fires. • Minister of Environment and Forestry Regulation No. P.21/MENLHK/SETJEN/KUM.I/7/2018 concerning Amendment to PermenLHK Year 5 of 2014 concerning Wastewater Quality Standards. 			
Non-Conformance Description (filled by auditor): The company has not been able to show evidence that the legal registration document contains all the regulations that support the company's operations.			
Root Cause Analysis (filled by organization audited): Updated the current list of regulatory documents submitted to each department and found that there was no department updating the regulation even though the relevant department was aware of the latest regulations Root of the problem: The absence of a designated PIC to coordinate and update all regulations relating to EHS, HR, plantation operations and other relevant regulations			
Correction (filled by organization audited): Review & renew the "Legal / standard evaluation document" to include relevant regulations or standards that are still valid.			
Corrective Action (filled by organization audited): Appoint EHS Assistant Manager as coordinator to review and update the "Legal / standard evaluation document"			
Assessor Evaluation and Conclusion (filled by auditor): Auditor Evaluation August 26, 2019 The company has made several improvements, one of them by appointing EHS Ast Manager as coordinator to			

review and update legal documents. In addition, the company also sent revised regulations that were updated by category and year. Based on the foregoing, the auditor states that the non-conformity is stated to have been fulfilled provided that it will be re-observed in the next assessment.

Verified by	:	Yudhi Yuniarto Tallutondok
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NCR No.	: 2019.02.	Issued by	: Radytio Puspanjana
Date Issued	: 9 August 2019	Time Limit	: 07 November 2019
NC Grade	: Major (recurrent Minor)	Date of Closing	: 06 September 2019
Standard Ref. & Requirement	5.3.3 : A documented and implemented waste management plan must be available to avoid and reduce pollution.		
Evidence observed (filled by auditor): <p>The waste management procedure (SOP.EHS.LIM-01) in clause 4.6 is explained the domestic waste produced by Housing complex shall be sorted organic waste (paper, food and wood) and anorganic (plastic, bottles & cans) and estate prepare for domestic waste bin and separated according to garbage type on each housing complex and transported to landfill.</p> <p>Base on document verification, the company shown monthly report EHS Inspection (monthly environmental and OHS inspection checklist) on SLE, TPE SWE and SBE housing complex explained inspections have been carried out in relation to the burning of waste in each housing.</p> <p>Based on inspections results conducted by the EHS Inspector July 2019 on SLE, TPE SWE and SBE housing complex, no domestic waste burning. However, based on visits housing complex on Audit ASA-4 SWE, TPE, SLE and SBE) found domestic waste burning activities.</p>			
Non-Conformance Description (filled by auditor): No be demonstrated domestic waste management has been implemented accordance with procedures.			
Root Cause Analysis (filled by organization audited): There are habits of some worker on housing complex still burning domestic waste.			
Correction (filled by organization audited): 1. The internal-memo for prohibition burning garbage. 2. Inform EHS department the monthly EHS inspection which currently only checking housing samples, be changed be check the entire housing complex.			
Corrective Action (filled by organization audited): 1. Conducting socialization related to domestic waste management procedures and the prohibition of burning domestic waste on housing complex. 2. Adding a signboard at the point where there is a risk of burning domestic waste on housing complex area.			
Assessor Evaluation and Conclusion (filled by auditor): Verification 2 September 2019 The company shown evidence consist of: <ul style="list-style-type: none"> - Evidence of socialization related to prohibition of domestic waste burning activities for worker on Sawahan Estate on housing complex 29 August 2019, worker of division 3 13 workers, division 1 17 workers, division 5 20 workers, division 4 13 workers, and division 1 12 workers. - Evidence of socialization related to prohibition of domestic waste burning activities for worker on Tanah Putih Estate on housing complex 29 August 2019, worker of division 1 & 2 20 workers, division 3&4 13 workers, division 3 20 workers, division 2 20 workers, and division 1 17 workers. - Evidence of socialization by EHS inspector related to checking / inspection of all housing complex 22 August 2019. 			

- The signboards of prohibiting waste burning and the use of used lubricant drums or ex-chemical container on Sawahan Estate and Tanah Putih Estate housing complex.
- The banners has been installed related to the prohibition of burning garbage and the use of use chemicals container.
- Internal Memo Number.001 / AB-IM / GMO / VIII / 2019 28 August 2019 from General Manager for all resident of housing complex related to the Prohibition of Waste Burning & Use chemical container. Explaining of :
 - Prohibition to burn garbage around housing complex such domestic waste, and dry leaves.
 - Pack domestic waste into plastic bags so easy to pick up and transport by janitors.
 - Arrange domestic waste on public road before being disposed to temporary garbage bin.

Verification 2 September 2019

The company shown evidence consist of:

- Evidence of socialization EHS inspector related to housing complex inspection 22 August 2019, the socialization conducted for 2 departments / divisions.
- There is evidence of an email to the EHS department regarding housing complex inspections 12 August 2019 regarding prohibition domestic waste burning explained that the company will not tolerate if still burning domestic waste on housing complex. During monthly EHS inspections, shall ensure that the EHS team can inspect each all housing complex. If still burning domestic waste on housing complex, shall be reported to the direct supervisor and reported on monthly EHS report.

Based on evidence submitted NC number 2019.02 declared is comply and will be observe on next audit.

Verified by	:	Radytio Puspanjana
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NCR No.	: 2019.03.	Issued by	: Moh Arif Yusni
Date Issued	: 09 August 2019	Time Limit	: 07 November 2019
NC Grade	: Major	Date of Closing	: 06 November 2019
Standard Ref. & Requirement	6.1.3 Plans for management and monitoring of social impacts to avoid or reduce negative impacts and promote positive ones, based on social impact assessment, through consultation with the affected parties, shall be available, documented and timetabled, including responsibilities for implementation.		
Evidence observed (filled by auditor): Documents verifications its known if the CH has been conducted review of the SIA documents for period April 2018 - March 2019, regarding positive and negative impacts due to operational company. based on review the positive impacts as follows job opportunities, , accessibility is easy and the village is easily accessible and there are business opportunities, furthermore there is negative impacts for example decreased river water quality, decreased availability of ground water, dust from FFB and CPO transportation and an increasingly consumptive society. Based on that's review The CH can presented documents SIA action plan reports for the next period, but it cannot be presented related: d. Social impact monitoring and management plan to avoid or reduce negative impacts and increase positive impacts based on the results of consultations with affected parties, e. Evidence that the results of the management and monitoring of social impacts carried out by the company in the previous period, has become a benchmark in the identification of the latest monitoring and management of social impacts f. Impact management and monitoring program by stating the implementation schedule / period and the officer responsible.			
Non-Conformance Description (filled by auditor): Not enough evidence is available The program of management and monitoring of the social impacts of the company has covered all issues, prepared based on the consultation process with the affected parties, and has not included the person in charge of the activity			
Root Cause Analysis (filled by organization audited): Inadequate understanding of the CSR staff who prepared the document and review the action plan report SIA period April 2018 - March 2019			
Correction (filled by organization audited): Reviewing the SIA's report documents and review of the action plan for the April 2018 - March 2019 period to cover all issues, compiled based on a process of consultation with affected parties and listing the schedule / implementation period accompanied by the officer in charge.			
Corrective Action (filled by organization audited): <ul style="list-style-type: none"> - Provide internal training for CSR staff - Appoint the CSR manager as the person responsible for implementing the program and reviewing the SIA document report • - Adding CSR managers as examiners of SIA report review document before it is signed by senior managers and general managers 			
Assessor Evaluation and Conclusion (filled by auditor): Verification 06 November 2019 The company can presented corrective evidence as follows:			

- Documentation of training activities on CSR Activity and Reporting of SIA Review addressed to the relevant PIC on August 27, 2019
- Reviewing SIA documents for the 20198-2019 period with a focus on tenure, plasma and plasma organizational institutions, improving the economy of the surrounding community, strengthening communication and networking with stakeholders, environmental monitoring programs, improving the quality of public health, improving the quality of public education and improving the field of employment.
- Documentation of this Social Management Strategy includes developing more detailed social management, allocating activity budgets, aligning and developing the commitment of the parent and company management at the operational level (policies, procedures and standards) in a corporate strategy and ensuring the implementation of activities in accordance with procedures and budget allocations
- Analysis of Social Management problems at PT Agro Bukit which explains about the program of activities, activities, developments, evaluations and expected outputs
- PT Agro Bukit's Social management plan for the April 2018 - March 2019 period, which explains the programs, activities, strategies, outputs, implementation planning, frequency and responsible PIC. Where the social plan is based on an analysis of the problems that exist in PT Agro Bukit

Related to the evidence of corrections submitted, non-conformities to this indicator are stated to have been fulfilled and will be verified at the next assessment

Verified by : **Moh Arif Yusni**

NCR No.	: 2019.04.	Issued by	: Moh Arif Yusni
Date Issued	: 09 August 2019	Time Limit	: Next Assessment
NC Grade	: Minor	Date of Closing	: 03 September 2019
Standard Ref. & Requirement	6.1.4 The documented management and monitoring of social impacts is reviewed at least every 2 years. If needed, the plan should be improved. Evidence must be provided that the review process involves the participation of all affected parties.		
Evidence observed (filled by auditor): Documents verifications its known if the CH has been conducted review of the SIA documents for period April 2018 - March 2019,. However, based on documents verifications its known if: <ul style="list-style-type: none"> - The participatory method used does not fully cover all the factors that can cause social impacts (both positive and negative) such as usage and access rights, traditional rights or customary rights owned by indigenous and tribal peoples, to the latest issues that develop in around the company's operational area. - The sample representation is not entirely representative of all affected parties (including local residents, women representatives, migrants, workers (local, migrants) to identify sources of impacts and potential social impacts, and determine recommendations for management and monitoring of social impacts. 			
Non-Conformance Description (filled by auditor): Not yet able to show proof of review of plans and programs that have a social impact management that has involved all parties affected			
Root Cause Analysis (filled by organization audited): Inadequate understanding of the CSR staff who prepared the document and review the action plan report SIA period April 2018 - March 2019			
Correction (filled by organization audited): Reviewing the SIA's report documents and review of the action plan for the April 2018 - March 2019 period to cover all issues, compiled based on a process of consultation with affected parties and listing the schedule / implementation period accompanied by the officer in charge.			
Corrective Action (filled by organization audited): <ul style="list-style-type: none"> - Provide internal training for CSR staff - Appoint the CSR manager as the person responsible for implementing the program and reviewing the SIA document report - Adding CSR managers as examiners of SIA report review document before it is signed by senior managers and general managers 			
Assessor Evaluation and Conclusion (filled by auditor): Verification 03 September 2019 The company can presented corrective evidence as follows: <ul style="list-style-type: none"> - Documentation of training activities on CSR Activity and Reporting of SIA Review addressed to the relevant PIC on August 27, 2019 - Reviewing SIA documents for the 20198-2019 period with a focus on tenure, plasma and plasma organizational institutions, improving the economy of the surrounding community, strengthening communication and networking with stakeholders, environmental monitoring programs, improving the quality of public health, improving the quality of public education and improving the field of employment. - In the SIA review it was explained that the study sites were in two target areas namely; 			

1. Internal with the main target of PT.Agro Bukit Central Kalimantan's employees who are living in housing / emplacement provided by the company, who are working in offices and employees who live in villages around the company.
 2. Externally with the main target of the village community being identified as the affected and vulnerable areas in Penyang Village, Rongkang Hamlet - Nata Baru Village, Bangkuang Makmur Village, Bagendang Tengah Village and Pasir Putih Village
- Can show documentation of meetings with external parties and evidence of the questionnaire

Related to the evidence of corrections submitted, non-conformities to this indicator are stated to have been fulfilled and will be verified at the next assessment

Verified by	:	Moh Arif Yusni
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NCR No.	: 2019.05.	Issued by	: Yudhi Yuniarto Tallutondok			
Date Issued	: 9 August 2019	Time Limit	: 07 November 2019			
NC Grade	: Major (recurrent Minor)	Date of Closing	: 03 September 2019			
Standard Ref. & Requirement	6.5.3 Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where such public facilities are unavailable or inaccessible.					
Evidence observed (filled by auditor): <p>The results of a field visit at the employee's housing found the use of used oil drums that are used as water reservoirs. Interviews with housing residents obtained information that the drums they got from outside the company with the aim of additional water reservoirs, because the water reservoirs currently available are limited and deemed insufficient.</p> <p>One of the company's efforts to overcome this, can be shown the Capital Expenditure Form (CEF) for the provision of the 2019 Water Treatment Plan emplacement H34 and H8. There has been an offer submitted by PT Borneo Indo Services on March 4, 2019, but until the audit activity has been carried out there has been no further progress from the making of the WTP's</p>						
Non-Conformance Description (filled by auditor): <p>The company has not been able to show evidence of adequate water supply for employees.</p>						
Root Cause Analysis (filled by organization audited): <p>There are several water reservoirs that have been provided by the company in a damaged condition in the employee's bathroom.</p>						
Correction (filled by organization audited): <ol style="list-style-type: none"> 1. Carry out socialization and reprimand related to the prohibition of the use of ex container chemicals (used oil drums) as a reservoir for water. 2. The company issues an Internal memo related to the prohibition of using ex chemicals used as water reservoirs. 3. Carry out repairs to the bathroom tub that is damaged in the residential area. 						
Corrective Action (filled by organization audited): <p>Make a routine repair / maintenance schedule like a water reservoir in a residential area.</p>						
Assessor Evaluation and Conclusion (filled by auditor): Verification 03 September 2019 <p>The company sent the following proofs of improvement:</p> <ol style="list-style-type: none"> 1. Internal Memo from General Manager number 001 / AB-IM / GMO / VIII / 2019 dated August 28, 2019 concerning the prohibition of burning garbage and the prohibition on the use of drums for packaging toxic and dangerous materials. 2. Proof of socialization (in the form of documentation, and attendance list) to employees of the SWE emplacement (Division 1-5) related to the prohibition on the use of used oil drums (both from internal and external acquisition) as water reservoirs and the prohibition of domestic waste burning activities in residential areas. 3. Proof of socialization (in the form of documentation and attendance list) to employees of TPE emplacement (Division 1-4) related to the prohibition on the use of used oil drums (both from internal and external acquisition) as water storage and prohibition of domestic waste burning activities in residential areas. 4. Employment inspection and maintenance plan for employee emplacement in 2019. In this document the company has prepared a program to conduct inspection, repair and maintenance of employee housing maintenance which includes water reservoirs. The program is structured for the period August 2019 - March 						

2020.

5. Minutes of withdrawal of oil drum and ex-chemical container in employee housing which will be held on August 15, 2019
6. Minutes of collecting oil and ex-chemical containers to the Hazardous Waste Temporary Warehouse which will be held on August 15, 2019
7. Documentation of withdrawal of oil drum and ex chemical container for further transport to Hazardous Waste Temporary Warehouse - Central Workshop
8. Documentation of the delivery of non-Hazardous Waste drums from the company to replace the oil drum and their ex-chemical container pulled by the company.

Related to the evidence of corrections and clarifications sent by the company, the non-compliance with this indicator is declared to have been fulfilled and will be verified at the next assessment.

Verified by	:	Moh Arif Yusni & Yudhi Yuniarto Tallutondok
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3.5.3. Opportunity for Improvement

No	Ref. Std.	Description Deskripsi
1	1.1.1	List of documents that can be accessed by the public includes operational reports and scheme smallholder payment of income (including details of debt).
2	2.1.1	Follow up the land application permit process.
3	2.2.1	Progress of land use title acquiring
4	3.1.1	Following up on the preparation of financial indicators (estimating prices, costs) for scheme smallholder
5	4.7.2	Implementation of OHS in the field such as replacement of damaged PPE that tends to be long, re-checking employees who do not have licenses or whose licenses have expired and rechecking expiration dates for the pesticides used.
6	6.8.3	Identification of employee needs and contract hiring programs are permanent.

3.5.4. Noteworthy Positive Components

No	Ref. Std.	Description
1		Has realized the construction of the scheme smallholder
2		PROPER Award with a blue rating from the Ministry of Environment and Forestry for the period of 2017 - 2018.

3.6 Summary of Arising Issues from Public and Auditor Verification

Public Issues (Institution/ NGO/Community)	Auditor Responses
<p>Labor and Transmigration Agency of Kotawaringin Timur Regency, Central Kalimantan</p> <ul style="list-style-type: none"> • There is a problem with the union related to the wage status of factory employees which have been tried through the bipartite and tripartite channels but so far no solution has been found. The status of this problem has been pending litigation. • There was a termination of employee employment but the status was resolved by escort by the labor union to Labor and Transmigration Agency of Kotawaringin Timur Regency • The company has a good relationship with the agency, besides that the company has also complied with applicable regulations, among others: having an OHS Committee, company regulations that have been authorized by the agency, possessing equipment and machinery permits, having licensed operators, and routinely sending reports related to employment and OHS • The Companies have implemented the payment of wages for employees refers to North Sumatera Governor Decree. • The company has a Collective Labor Agreement between PT Agro Bukit and the Executive Board of Workers Union. The Collective Labor Agreement has been registered to Labor Agency of Kotawaringin Timur Regency. • All mandatory reports related to employment have reported well. • There are no issues of migrant workers, no child workers, no substitution contracts, no labor trade or forced labor forms. • All employees have employment agreements and there were no issues or violations committed by Companies related to worker welfare included in payment. 	<p>It has been verified and stated under principle 5 in the report</p>
<p>Agriculture Agency of Kotawaringin Timur Regency, Central Kalimantan</p> <ul style="list-style-type: none"> • The company has conducted an assessment of plantation business in 2018 with Class III. the lowest point is the development of scheme smallholder which are still constrained by available land which is a production forest area. • There is no mandatory report sent by the company that covers CSR to the surrounding community. • The company has a good relationship with the agency, 	<p>It has been verified and stated under Criteria 1.1; 2.1; 4.7; and 6.10 on The report</p>

Public Issues (Institution/ NGO/Community)	Auditor Responses
<p>besides that the company has also complied with applicable regulations, among others: have had adequate fire infrastructure facilities for the plantation scale.</p> <ul style="list-style-type: none"> • There are no issues related to disruption of plantation business. • There is no issues of land fires and Tools and fire brigade personnel are sufficient. 	
<p>Nusa Lima Employee Cooperatives</p> <ul style="list-style-type: none"> • Good cooperation between company and smallholders. • Annual Meeting of Members for the 2018 financial year was carried out in March 2019. • Cooperatives have real activities in the form of savings and loans. • Cooperative members number 216 members • The company has provided support to cooperatives by providing empty housing for supply of cooperative goods. 	<p>The company has shown documentary evidence regarding payment transparency, price accuracy according to pricing mechanism from Plantation Agency, and timely payment methods. Described in Criteria 6.10.</p>
<p>Labour Union Of PT Agro Bukit (Konfederasi Serikat Buruh Seluruh Indonesia)</p> <ul style="list-style-type: none"> • The term of office of the board of directors in 2017 - 2020 and the selection of administrators there is no intervention from the company but rather the results of the selection of members. • There are workers with PKWT status whose contracts letter is made after the worker works first. • The wage scale has been applied in the mill and estate. • Damaged PPE can be replaced by showing evidence of damaged PPE. 	<p>The points issues have been verified and describe to the criteria 1.2, 2.1, 4.7, 6.3, 6.5, 6.6, 6.7, 6.8, 6.9, 6.12, 6.13</p>
<p>Previous land owner and elder of Penyang Village</p> <p>The land compensation process has been carried out with participatory land identification, negotiable compensation, no intimidation, good administration, involving witnesses and mediation of the traditional leader, Village Head, and Sub-District Head.</p>	<p>There is no negative issue that need further verification The CH has provided evidence of these aspects. Describes in more detail in Criterion 2.2, 2.3, and 6.4.</p>
<p>Previous land owner and elder of Pasir Putih Village</p> <p>The land compensation process has been carried out with participatory land identification, negotiable compensation, no intimidation, good administration, involving witnesses and mediation of the traditional leader, Village Head, and Sub-</p>	<p>There is no negative issue that need further verification The CH has provided evidence of these aspects. Describes in more detail in Criterion 2.2, 2.3, and 6.4.</p>

Public Issues (Institution/ NGO/Community)	Auditor Responses
District Head.	
<p>Plasma Cooperative Head of Sinar Mentari Pagi</p> <p>The cooperation between plasma cooperative and the CH has just been formed based on MOU No. PTAB/C/364.4 dated 22 January 2019. The MoU includes 215,5 ha plasma smallholder and 10 ha of village-owned oil palm plantation/business.</p> <p>The plasma comes from existing (planted) CH's oil palm area (planting year of 2006 to 2008) that set aside for plasma. Payment will be conducted in every three month, starting in August 2019, and the pricing based on regulation of Plantation Agency pricing mechanism.</p> <p>The community feels the positive impact regarding the existence of the CH, in aspect of communities empowering.</p>	<p>There is no negative issue that need further verification The CH has provided evidence of these aspects. Describes in more detail in Criterion 6.10 and 6.11.</p>
<p>Village Head of Pasir Putih</p> <p>The land compensation process has been carried out with participatory land identification, negotiable compensation, no intimidation, good administration, involving witnesses and mediation of the traditional leader, Village Head, and Sub-District Head.</p> <p>In the begining there were quite a lot of land disputes, but they were carried out by the families of landowners who were not satisfied with the distribution of their internal compensation. Each land dispute is resolved in a participatory manner and without intimidation or violence.</p> <p>Early in 2019 a plasma partnership had been formed for villages around the company. The community feels a positive impact on the CH's existence.</p> <p>There is no other negative issue.</p>	<p>There is no negative issue that need further verification The CH has provided evidence of these aspects. Describes in more detail in Criterion 2.2, 2.3, 6.1, 6.10 and 6.11.</p>
<p>Village Head of Bagendang Tengah</p> <p>The land compensation process has been carried out with participatory land identification, negotiable compensation, no intimidation, good administration, involving witnesses and mediation of the traditional leader, Village Head, and Sub-District Head.</p> <p>In the begining there were quite a lot of land disputes, but they were carried out by the families of landowners who were not</p>	<p>There is no negative issue that need further verification The CH has provided evidence of these aspects. Describes in more detail in Criterion 2.2, 2.3, 6.1, 6.10 and 6.11.</p>

Public Issues (Institution/ NGO/Community)	Auditor Responses
<p>satisfied with the distribution of their internal compensation. Each land dispute is resolved in a participatory manner and without intimidation or violence.</p> <p>Early in 2019 a plasma partnership had been formed for villages around the company. The community feels a positive impact on the CH's existence.</p> <p>There is no other negative issue.</p>	
<p>Gender Committee of PT Agro Bukit</p> <p>The CH has socialized corporate policies related to human rights, non violence, and protection of women's reproductive rights.</p> <p>No cases related to human rights, violence, or harassment. Every female employee has been granted menstrual leave rights, before and after childbirth. There have been mechanisms to monitor pregnant and breastfeeding female workers not working in chemicals.</p>	<p>There is no negative issue that need further verification. The workers understood corporate policies related to human rights, non violence, and protection of women's reproductive rights. There is no cases related to human rights, violence, or harassment. Describes in criteria 6.8 and 6.9</p>
<p>CV SAP - Local Contractor of FFB and EFB transport from Pasir Putih Village</p> <p>The agreement is made in negotiable manner. The Contractor understands the provisions in agreement such as volume, price, duration, payment method, aspect of OHS and environment. Dispute settlement methods available.</p> <p>Payment has been made on time in accordance with the provisions in the agreement. No obstacles related to cooperation with the Company, because the Company is open to consulting related work issues.</p> <p>The contractor felt the CH's positive impact in empowering the local business.</p>	<p>There is no negative issue that need further verification. The CH shows compliance related the tranperency and empowering the local community, describes in criteria 6.10 and 6.11.</p>

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY
4.1	Formal Sign-off of Assessment Findings
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;"> <p>PT Agro Bukit Management Representative</p>  <p><u>Saepul Bahri</u> Wednesday, 06 November 2019</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><u>Moh Arif Yusni</u> Wednesday, 06 November 2019</p> </div> </div>

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

No	Institution/NGO/Community	Address	Phone/Email	Form of Communication	Date of Contact	Response	
						Yes	No
1	One person of previous land owner and elder in Penyang Village	Penyang Village, Telawang Sub-District, Kotawaringin Timur Regency	-	Direct Interview	6 August 2019	✓	
2	One person of previous land owner and elder in Pasir Putih Village	Pasir Putih Village, Mentawa Baru Ketapang Sub-District, Kotawaringin Timur Regency	-	Direct Interview	6 August 2019	✓	
3	Plasma Cooperative Head of Sinar Mentari Pagi	Pasir Putih Village, Mentawa Baru Ketapang Sub-District, Kotawaringin Timur Regency	-	Direct Interview	6 August 2019	✓	
4	Village Head of Pasir Putih	Pasir Putih Village, Mentawa Baru Ketapang Sub-District, Kotawaringin Timur Regency	-	Direct Interview	6 August 2019	✓	
5	Village Head of Bagendang Tengah	Bagendang Tengah, Mentaya Hilir Utara Sub-District, Kotawaringin Timur Regency	-	Direct Interview	6 August 2019	✓	
6	CV SAP - Local Contractor of FFB and EFB transport from Pasir Putih Village	Pasir Putih Village, Mentawa Baru Ketapang Sub-District, Kotawaringin Timur Regency	-	Direct Interview	06 August 2019	✓	
7	Gender Committee of PT Agro Bukit	PT Agro Bukit	-	Direct Interview	6 August 2019	✓	
8	Environmental Agency	Kotawaringin Regency	-	Direct Interview	5 August 2019	✓	
9	One person of previous land owner and elder in Penyang Village	Penyang Village, Telawang Sub-District, Kotawaringin Timur Regency	-	Direct Interview	6 August 2019	✓	
10	One person of previous land owner and elder in Pasir Putih Village	Pasir Putih Village, Mentawa Baru Ketapang Sub-District, Kotawaringin Timur Regency	-	Direct Interview	6 August 2019	✓	
11	Plasma Cooperative Head of Sinar Mentari Pagi	Pasir Putih Village, Mentawa Baru Ketapang Sub-District, Kotawaringin Timur Regency	-	Direct Interview	6 August 2019	✓	
12	Village Head of Pasir Putih	Pasir Putih Village, Mentawa Baru Ketapang Sub-District, Kotawaringin Timur Regency	-	Direct Interview	6 August 2019	✓	
13	Village Head of Bagendang Tengah	Bagendang Tengah, Mentaya Hilir Utara Sub-District, Kotawaringin Timur Regency	-	Direct Interview	6 August 2019	✓	
14	Labor and Transmigration Agency of Kotawaringin Timur Regency	Kotawaringin Regency	-	Direct Interview	5 August 2019	✓	

14	Agriculture Agency of Kotawaringin Timur Regency	Kotawaringin Regency	-	Direct Interview	5 August 2019	✓	
15	Nusa Lima Employee Cooperatives	Kotawaringin Regency	-	Direct Interview	06 August 2019	✓	
16	Labour Union Of PT Agro Bukit (Konfederasi Serikat Buruh Seluruh Indonesia)	Kotawaringin Regency	-	Direct Interview	5 August 2019	✓	

Appendix 2. Assessment Program

DATE	05 to 10 August 2019	
PROGRAM	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 05 August 2019		
06.15 - 08.00	Jakarta → Sampit	All Auditor
09.00 – 11.00	Sampit → PT Agro Bukit	MAY / AFS
14.00 – 15.00	Opening meeting <ul style="list-style-type: none"> Auditee Speech (Introduction of PIC, Profile of Certified Management Unit) Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification) 	MAY / AFS
14.00 – 16.00	Stakeholders consultation to related agencies in Kotawaringin Timur Regency	RPJ / YYT
15.00 – 16.00	Documents Review <ul style="list-style-type: none"> Review of previous (Initial assessment) findings Verification of Basic Information Mill and Estate Confirmation of Time Bound Plan Review of Partial Certification 	MAY
Tuesday, 06 August 2019		
08.00 – 14.00	Stakeholder consultation to affected communities surrounding the plantations and previous land owner	AFS
09.00 – 12.00	Field Observation to Tanah Putih Estate Aspect to be verified : <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries); Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) Implementation of Occupational Health & Safety Aspect Implementation of Employment Procedure and Mechanism Aspect Observation of Workers Facilities (Housing, School, Worship Place). 	RPJ MAY RPJ YYT YYT MAY
12.00 – 14.00	Break	All Auditor
14.00 – 17.00	Interview with Gender Committee, Worker's Union, Worker's Cooperative (if any), Local Contractor (for Mill and Estate), Third Party Supplier	YYT

14.00 – 17.00	Field Observation to Sungai Binti POM Aspect to be verified : <ul style="list-style-type: none"> • Supply Chain verification (FFB Receiving, Weighbridge, FFB Sorting, Processing Activity, Despatch CPO) • Occupational Health & Safety Aspect (Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, POME Pond) • Implementation of Employment Procedure and Mechanism Aspect 	MAY RPJ AFS
Wednesday, 07 August 2019		
08.00 – 12.00	Field Observation to Sawahan Estate Aspect to be verified : <ul style="list-style-type: none"> • Implementation of Legal Aspect (Land Ownership, Legal Boundaries); • Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) • Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) • Implementation of Occupational Health & Safety Aspect • Implementation of Employment Procedure and Mechanism Aspect • Observation of Workers Facilities (Housing, School, Worship Place). 	RPJ MAY RPJ YYT YYT MAY
12.00 – 14.00	Break	All Auditor
14.00 – 17.00	<ul style="list-style-type: none"> • Verification of stakeholder consultation result and field visit. • Document review and completing audit checklist. 	All Auditor
Thursday, 08 August 2019		
08.00 – 12.00	Field Observation to Sungai Binti dan Sungai Lenggana Estate Aspect to be verified : <ul style="list-style-type: none"> • Implementation of Legal Aspect (Land Ownership, Legal Boundaries); • Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) • Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) • Implementation of Occupational Health & Safety Aspect • Implementation of Employment Procedure and Mechanism Aspect • Observation of Workers Facilities (Housing, School, Worship Place). 	All Auditor
12.00 – 14.00	Break	All Auditor
14.00 – 17.00	<ul style="list-style-type: none"> • Verification of stakeholder consultation result and field visit. • Document review and completing audit checklist. 	All Auditor
Friday, 09 August 2019		
08.00 – 11.30	<ul style="list-style-type: none"> • Continue Field Observation to Estate; Mill and Public Consultation to Company surrounded village and community leader (if needed) • Completion of checklist and RSPO Document Review 	All Auditor
11.30 – 13.00	Break	
13.00 – 15.00	Internal discussion by auditor team preparing for Closing Meeting	All Auditor

15.30 – 16.30	Closing Meeting: <ul style="list-style-type: none"> • Presentation of audit findings (Noteworthy Positive Component, Non Conformities, OFI, Timelie of CAR's, Conclusion)/ • Comments, Responses and Questions 	All Auditor
Saturday, 10 August 2019		
07.00 – 08.00	PT Agro Bukit → Sampit	
08.00 – ..	Sampit → Jakarta	All Auditor