

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

**[✓] Surveillance**

Name of Management : Bumi Palma Mill – PT Bumipalma Lestari Persada, subsidiary of Golden Agri Organisation Resources Ltd

Plantation Name : PT Bumipalma Lestari Persada – Bumi Palma Mill, Bumi Palma Estate, Bumi Sentosa Estate and Bumi Lestari Estate

Location : Bagan Jaya Village, Tempuling Sub District, Indragiri Hilir District, Riau Province, Indonesia

Certificate Code : **MUTU-RSPO/034**

Date of Initial Registration : 25 March 2014

Date of Last Issue : 16 April 2019                      Date of License Issue : 25 April 2020

Date of Certificate Expiry : 24 March 2024                      Date of License Expiry : 24 March 2021

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-1.1	24 to 28 February 2020	Leonada (Lead Auditor), Asystasya Aishah Silalahi, Hasiholan Sihombing, Rahmat Abdiansyah	Octo H.P.N. Nainggolan	Ardiansyah

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-1.1	20 March 2020

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 on March 12<sup>th</sup>, 2014 with registration number **ASI-ACC-055**

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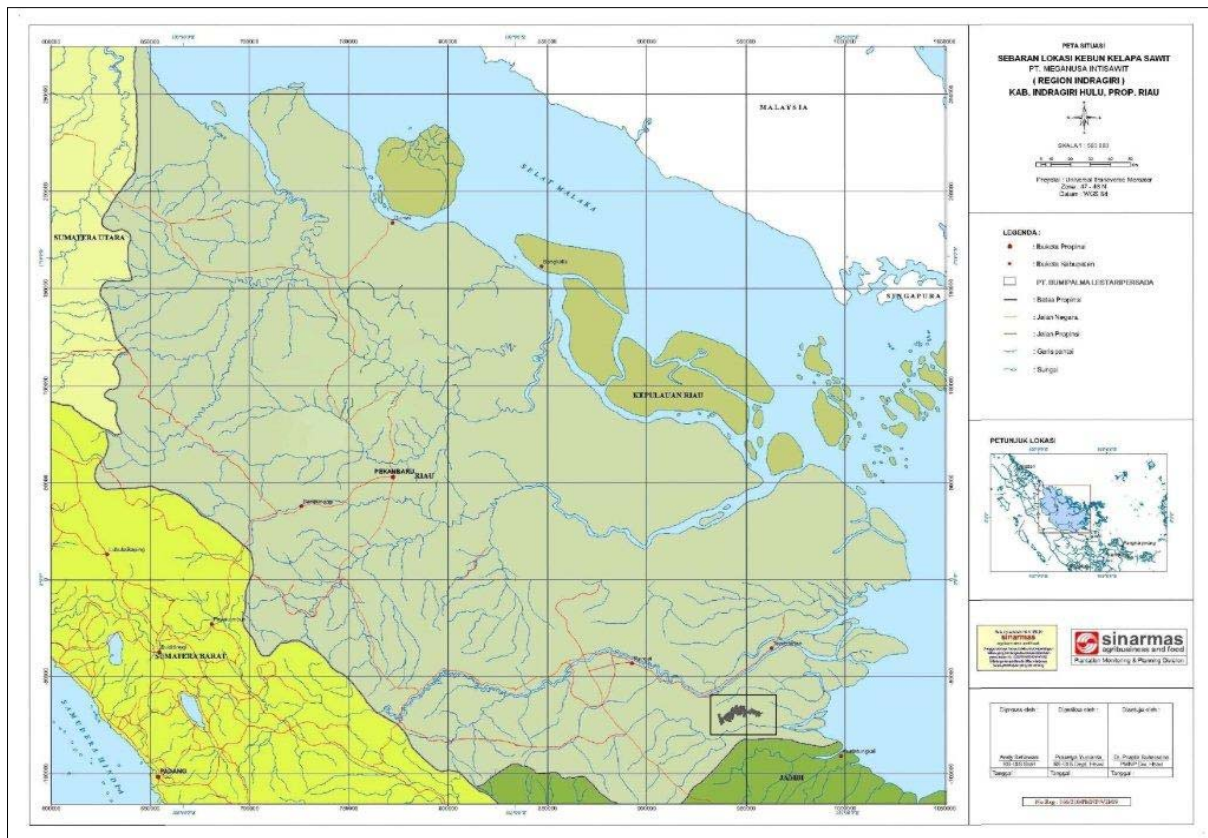
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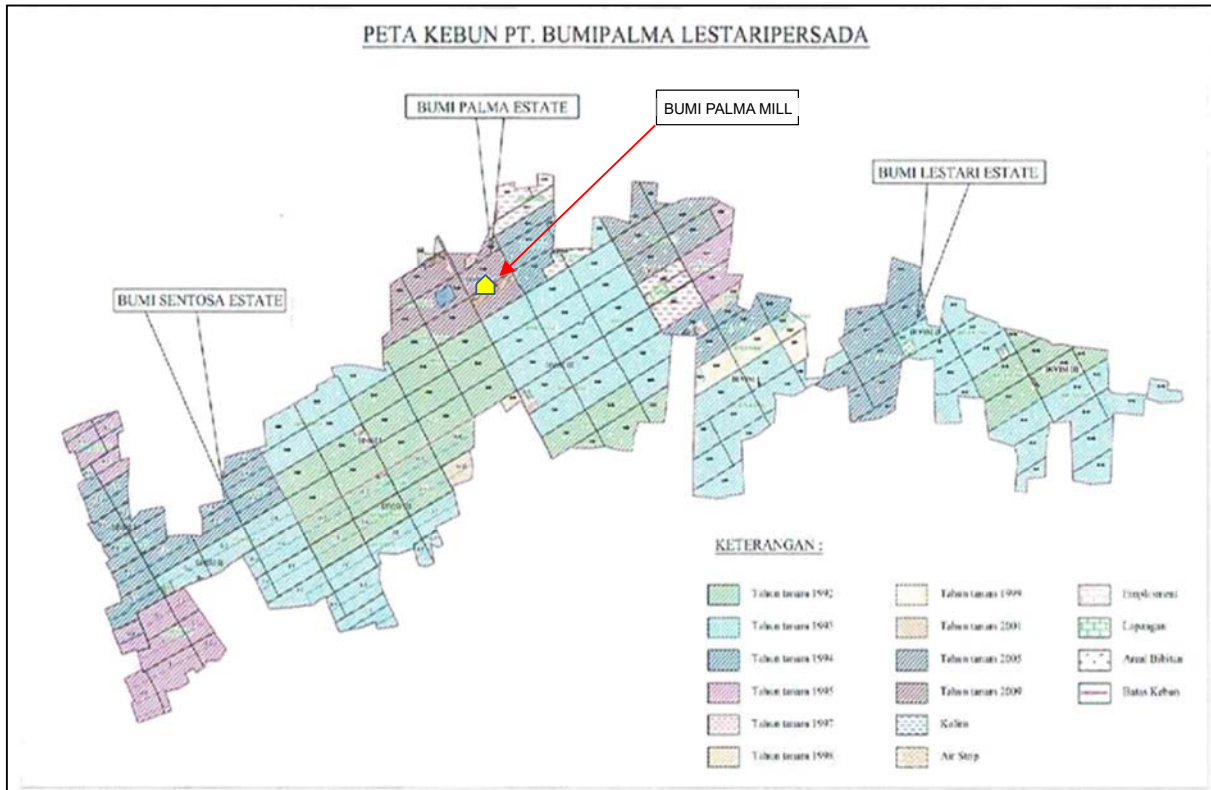
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Figure 1. Location Map of PT Bumipalma Lestari Persada



**Figure 2. Operational Map of PT Bumipalma Lestari Persada**



**Abbreviations Used**

BOD	:	Biochemical Oxygen Demand
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i> / Social Security Agency
BPME	:	Bumi Palma Estate
BPM	:	Bumi Palma Mill
BPLE	:	Bumi Lestari Estate
BPLP	:	Bumipalma Lestari Persada
BSNE	:	Bumi Sentosa Estate
CB	:	Certification Body
CH	:	Certification Holder
CLA	:	Collective Labour Agreement
COD	:	Chemical Oxygen Demand
CPO	:	Crude Palm Oil
CSPK	:	Certified Sustainable Palm Kernel
CSP	:	Certified Sustainable Palm Oil
EIA	:	Environment Impact Assessment
FFB	:	Fresh Fruit Bunch
FPIC	:	Free, Prior, Informed, Consent
FR	:	Frequency Rate
GAR	:	Golden Agri Resources
GHG	:	Green House Gases
GPS	:	Global Positioning System
GSEP	:	GAR Social and Environment Policy
HCS	:	High Carbon Stock
HCV	:	High Conservation Value
HGU	:	<i>Hak Guna Usaha</i> (Land Use Title)
IPM	:	Integrated Pest Management
KER	:	Kernel Extraction Rate
LSU	:	Leaf Sampling Unit
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
PMNP	:	Plantation Monitoring and Planning
PNC	:	Principles and Criteria
POME	:	Palm Oil Mill Effluent
PPE	:	Personal Protective Equipment
RKL	:	<i>Rencana Kelola Lingkungan</i> (Environment Management Plan)
RPL	:	<i>Rencana Pemantauan Lingkungan</i> (Environment Monitoring Plan)
RSPO	:	Roundtable on Sustainable Palm Oil
RTE	:	Rare, Threatened, Endangered
SCCS	:	Supply Chain Certification Standard
SIA	:	Social Impact Assessment
SMARTI	:	Sinar Mas Agro Resources and Technology Research Institute
SMD	:	Senior Managing Director
SOP	:	Standard Operational Procedure
SR	:	Severity Rate
SSU	:	Soil Sampling Unit

WTP	:	Water Treatment Plant
WWTP	:	Waste Water Treatment Plant

<b>1.0 SCOPE OF THE CERTIFICATION ASSESSMENT</b>			
<b>1.1 Assessment Standard Used</b>		<ul style="list-style-type: none"> <li>Principles and Criteria for the Production of Sustainable Palm Oil 2018, endorsed by the RSPO Board of Governors and adopted at the 15<sup>th</sup> Annual General Assembly by RSPO Member on 15 November 2018.</li> <li>RSPO Certification System for Principles and Criteria, 14 June 2017</li> </ul>	
<b>1.2 Organisation Information</b>			
1.2.1	Organisation name listed in the certificate	Bumi Palma Mill – PT Bumipalma Lestari Persada, subsidiary of Golden Agri Resources Ltd	
1.2.2	Contact person	Yahya Mustakim	
1.2.3	Organisation address and site address	<b>RSPO registered company:</b> 108 Pasir Panjang Road, #06-00 Golden Agri Plaza, Singapore 118535  <b>Liaison Office:</b> Sinar Mas Land Plaza, Tower II, 30th Floor Jl. MH Thamrin No. 51, Jakarta 10350, Indonesia	
1.2.4	Telephone	(+62-21) 5033 8899 ext 1184	
1.2.5	Fax	(+62-21) 5038 9999	
1.2.6	E-mail	<a href="mailto:yahya.mustakim@sinar-mas-agri.com">yahya.mustakim@sinar-mas-agri.com</a>	
1.2.7	Web page address	<a href="http://www.goldenagri.com.sg">www.goldenagri.com.sg</a>	
1.2.8	Management Representative who completed the application for certification	Yahya Mustakim (Head of SPO Certification & Low GHG Emissions Strategy)	
1.2.9	Registered as RSPO member	1- 0096 – 11 – 000 – 00; 30 January 2005	
<b>1.3 Type of Assessment</b>			
1.3.1	Scope of Assessment and Number of Management Unit	Palm Oil Mill and supply bases: Bumi Palma Estate, Bumi Sentosa Estate and Bumi Lestari Estate	
1.3.2	Type of certificate	Single	
<b>1.4 Locations of Mill and Plantation</b>			
1.4.1	Location of Mill		
	<b>Name of Mill</b>	<b>Location</b>	<b>Coordinate</b>
			<b>Latitude</b>
			<b>Longitude</b>
	Bumi Palma Mill	Bagan Jaya Village, Tempuling Sub District, Indragiri Hilir District, Riau Province, Indonesia	<b>S 0° 35' 53"</b>
			<b>E 102° 59' 01"</b>

1.4.2	Location of Certification Scope of Supply Base				
	Name of Supply Base	Location	Coordinate		
			Latitude	Longitude	
	Bumi Palma Estate	Bagan Jaya Village, Tempuling Sub District, Indragiri Hilir District, Riau Province, Indonesia	S 0°36' 14"	E 102° 59' 19"	
	Bumi Lestari Estate	Pebenaan Village, Kritang Sub District, Indragiri Hilir District, Riau Province, Indonesia	S 0°35' 59"	E 103° 01' 35"	
	Bumi Sentosa Estate	Suhada Village, Kritang Sub District, Indragiri Hilir District, Riau Province, Indonesia	S 0°39' 11"	E 102° 55' 54"	
1.5 Description of Area Statement					
1.5.1	Tenure				
	• State		6,690.00 Ha		
	• Community		- Ha		
1.5.2	Area Statement				
	• Total area		6,690.00 Ha		
	• Mature area		4,780.27 Ha		
	• Immature area		1,302.28 Ha		
	• Mill and Emplishment		45.90 Ha		
	• Road		260.35 Ha		
	• Canal		272.20 Ha		
	• Air Strip		5.41 Ha		
	• Dock		0.08 Ha		
	• Trenches		0.23 Ha		
	• Enclave		23.28 Ha		
	Source: Basic Info of PT BPLP 2020				
1.6 Planting Year and Cycles					
1.6.1	Age profile of planting year				
	Planting Year	Hectarage (Ha)			
		Bumi Palma Estate	Bumi Lestari Estate	Bumi Sentosa Estate	Total
	2005	223.29	-	-	223.29
	2009	248.00	-	-	248.00
	2011	221.55	317.82	-	539.37
	2012	573.81	239.21	-	813.02
	2013	266.15	212.75	-	478.90



	2014	343.09	284.61	-	627.70		
	2015	239.37	350.02	203.80	793.19		
	2016	337.56	244.57	-	582.13		
	2017	-	-	474.67	474.67		
	Mature Area	2,452.82	1,648.98	678.47	4,780.27		
	2017	276.77	-	1,025.51	1,302.28		
	Immature Area	276.77	-	1,025.51	1,302.28		
	TOTAL	2,729.59	1,648.98	1,703.98	6,082.55		
1.6.2	New Planting area after January 2010			- Ha			
1.6.3	Planting Cycle			2 <sup>nd</sup> 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 (ton)	Extraction (%)	Out put (ton)	Extraction (%)
	Bumi Palma	30	157,473.83	33,982.76	21.58	8,140.42	5.17
	*Production data source from February 2019 - January 2020						
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)	%
	Bumi Palma	2,994.14	2,729.59	55,726.41	20.42	55,726.41	100
	Bumi Lestari	1,826.38	1,648.98	38,674.22	23.45	38,674.22	100
	Bumi Sentosa	1,869.48	1,703.98	4,405.22	2.59	4,405.22	100
	TOTAL	6,690.00	6,082.55	98,805.85	16.24	98,805.85	100
	*Production data source from February 2019 - January 2020						
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)		
	Scheme Smallholders of PT Meganusa Intisawit – RSPO Certified	Associate growers	-	14,053.00	4,090.92		
	Bumi Palma Estate (HGU on process) – Non Certified	PT BPLP	-	39.21	82.41		
	PT Kharisma Riau Sentosa Prima – Non Certified	Independent outgrower	-	-	13,419.31		
	PT Agro Tunggal Jaya Mandiri – Non Certified	Independent outgrower	-	-	41,075.35		

	TOTAL				58,667.99			
<i>*Production data source from February 2019 - January 2020</i>								
1.7.4	Product categories			FFB, CPO, PK				
1.8 Estimate Tonnage of Certified Product								
1.8.1	Past Annual Claim Certified Product		Last Year Projected Certified Volume (MT)		Last Year Actual Certified Volume (February 2019 to January 2020) (MT)			
	• FFB Production		103,500		102,896.77			
	• CPO Production		26,230		22,411.81			
	• Palm Kernel (PK) Production		5,760		5,473.33			
1.8.2	Product selling							
	Tonnage of selling product		Actual selling product for last year (February 2019 to January 2020) (MT)					
	• CSPO sold as RSPO certified product		13,445.31					
	• CSPK sold as RSPO certified product		5,357.95					
	• CSPO sold under other scheme		8,876.49					
	• CSPK sold under other scheme		0					
	• CSPO sold as conventional		0					
	• CSPK sold as conventional		0					
1.8.3	Estimate of Certified FFB Claim							
	Name of Estates	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)			
	Bumi Palma	2,994.14	2,729.59	59,000	21.61			
	Bumi Lestari	1,826.38	1,648.98	41,000	24.86			
	Bumi Sentosa	1,869.48	1,703.98	5,000	2.93			
	TOTAL	6,690.00	6,082.55	105,000	17.26			
<i>*Projected FFB production for 25 March 2020 to 24 March 2021</i>								
1.8.4	Estimate of Certified Palm Product Claim							
	Name of Mill	Capacity (tonnes/hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel		Supply Chain Module
				Out put (ton)	Extraction (%)	Out put (ton)	Extraction (%)	
	Bumi Palma	30	105,000	23,100	22	5,800	5.5	MB
<i>*Projected CSPO and CSPK production for 25 March 2020 to 24 March 2021</i>								
1.9 Other Certifications								
	ISCC		ISCC from Intertek Period 2020 to 2021					
	Others		<ul style="list-style-type: none"><li>ISPO from Mutuagung Lestari period 2019 to 2024</li><li>OHS Management System from PT Alco Indo Sejahtera period 2018 to 2021</li></ul>					
1.10 Time Bound Plan								

<b>1.10.1 Time Bound Plan for Other Management Units</b>					
<b>Management Unit</b>		<b>Estate (Supply Base)</b>	<b>Time Bound Plan</b>	<b>Location</b>	<b>Status</b>
<b>Mill</b>	<b>Time bound</b>				
Pangkalan Panji (PT Sawit Mas Sejahtera)	2013	Sawit Mas Estate	2013	Sumatera Selatan Province	Certified
		Sawit Mas Estate (HGU on progress)	2022		-
Bumi Sawit Mill (PT Bumi Sawit Permai)	2013	Bumi Sawit Estate	2013	Sumatera Selatan Province	Certified
		Bumi Sawit Estate (HGU on progress)	2022		-
Muara Kandis Mill (PT Djuanda Sawit Lestari)	2013	Muara Tawas Estate	2013	Sumatera Selatan Province	Certified
		Muara Kandis Estate	2013		Certified
		Muara Kandis Estate (HGU on progress – 402.41 Ha)	2022		-
		Muara Tawas Estate (HGU on progress – 73.78 Ha)	2022		-
		Smallholder (KKPA Pandawa)	2021		-
Sungai Rungau Mill (PT Sumber Indah Perkasa)	2013	Sungai Rungau Estate	2013	Kalimantan Tengah Province	Certified
		Sungai Seruyan Estate	2013		Certified
		Terawan Estate	2013		Certified
		Tangar Estate	2013		Certified
		Bukit Tiga Estate	2013		Certified
Bukit Perak EMIII (PT Bumi Permai Lestari)	2013	Bukit Perak Estate	2013	Bangka Belitung Province	Certified
		Bukit Permata Estate	2013		Certified
		Bumi Lestari Estate (PT Bumi Bangka Lestari)	2023		-
		Bumi Permai Estate (PT Bumi Permai Surya Lestari)	2023		-
Tanjung Kembiri Mill (PT Forestalestari Dwikarya)	2013	Tanjung Kembiri Estate	2013	Bangka Belitung Province	Certified
		Tanjung Rusa Estate	2013		Certified
		Tanjung Rusa Estate (HGU on process 48.81 Ha)	2022		-
		Tanjung Sawit Estate (PT Palmindo Billiton Berjaya)	2023		-
		Tanjung Sawit	2023		-

		Plasma (PT Palmindo Billiton Berjaya)			
		Tanjung Rusa KKPA	2021		-
Sungai Buaya Mill (PT Sumber Indah Perkasa)	2014	Sungai Buaya Estate	2014	Lampung Province	Certified
		Sungai Buaya Estate (HGU on process)	2022		-
		Smallholder (KKPA Gedung Aji Lama)	2014		Certified
		Smallholder (KKPA Mesuji)	2014		Certified
Sungai Merah Mill (PT Sumber Indah Perkasa)	2014	Sungai Merah Estate (HGU on process)	2014	Lampung Province	Certified
		Sungai Merah Estate	2022		-
		Smallholder (KKPA Gedung Aji Baru)	2014		Certified
Kasuari Mill (PT Sinar Kencana Inti Perkasa)	2021	Cendrawasih Estate	2021	Papua Province	ST-1
		Nuri Estate	2021		ST-1
		Rajawali Estate	2021		ST-1
		Mambruk Estate (PT Sumber Indah Perkasa)	2021		ST-1
Pekawai Mill (PT Agrolestari Mandiri)	2020	Kayung Estate	2020	Kalimantan Barat Province	ST-1
		Pekawai Estate	2020		ST-1
		Sungai Kelik Estate	2020		ST-1
		Nanga Tayap Estate	2020		ST-1
		Smallholder (Kayung Plasma)	2022		ST-1
Kenanga Mill (PT Kencana Graha Permai)	2014	Kencana Estate	2015	Kalimantan Barat Province	Certified
		Cendana Estate	2015		Certified
		Kenanga Estate (PT Cahaya Nusa Gemilang)	2018		Certified
		Delima Estate (PT Kencana Graha Permai)	2020		-
		Smallholder (Kencana Plasma)	2022		-
		Smallholder (Kenanga Plasma)	2022		-
Perdana Mill (PT Binasawit Abadi Pratama)	2023	Perdana Estate	2023	Kalimantan Tengah Province	ST-1
		Lenggana Estate	2023		ST-1
		Semandau Estate	2023		ST-1

		Muara Dua Estate	2023		ST-1
Kuayan Mill (PT Agrokarya Prima Lestari)	2023	Bukit Santuhai Estate	2023	Kalimantan Tengah Province	ST-1
		Tajur Beras Estate	2023		ST-1
		Seranau Estate	2023		ST-1
		Sungai Sambon Estate	2023		ST-1
		Sungai Sambon Plasma	2023		-
		Sapiri Estate (PT Buana Adhitama)	2023		ST-1
		Sapiri Plasma	2023		-
		Bukit Dua Estate (PT Buana Adhitama)	2023		-
		Bukit Tunggal Estate (PT Buana Adhitama)	2023		-
Belian Mill (PT Paramitra Internusa Pratama)	2020	Belian Estate	2020	Kalimantan Barat Province	ST-1
		Tengkawang Estate	2020		ST-1
		Muara Tawang Estate (PT Kartika Prima Cipta)	2020		ST-1
		Kapuas Hulu Estate (PT Persada Graha Mandiri)	2020		ST-1
		Sungai Beran Estate (PT Persada Graha Mandiri)	2020		ST-1
		Smallholder (Belian KKPA)	2021		-
		Smallholder (Muara Tawang KKPA)	2021		-
		Smallholders (Kapas Hulu KKPA)	2021		-
Sungai Kupang Mill (PT Sinar Kencana Inti Perkasa)	2020	Sungai Kupang Estate	2020	Kalimantan Selatan Province	IC
		Sungai Kupang KKPA	2022		-
Sungai Kikim Mill (PT Sawit Mas Sejahtera)	2021	Sungai Kikim Estate	2021	Sumatera Selatan Province	-
		Sungai Pangi Estate	2021		-
		Sungai Musi Estate	2021		-
		Sungai Saling Estate	2021		-
		Sungai Enim Estate (PT Bumi Sawit Permai)	2021		-
		Sungai Lematang Estate (PT Bumi	2021		-

		Sawit Permai)			
		Sungai Bungur Estate (PT Prima Cipta Mandiri)	2021		-
		Sungai Lingsing Estate (PT Prima Cipta Mandiri)	2021		-
Tangar Mill (PT Mitra Karya Agroindo)	2023	Sulin Estate	2023	Kalimantan Tengah Province	-
		Sulin Plasma	2023		-
		Nahiyang Estate	2023		-
		Katayang Estate	2023		-
		Sungai Nusa Estate	2023		-
		Sungai Ayawan Estate (PT Aditunggal Mahajaya)	2023		-
Sungai Magalau Mill (PT Sinar Kencana Inti Perkasa)	2021	Sungai Magalau Estate	2021	Kalimantan Selatan Province	-
		Senakin Estate	2021		-
Jalemo Mill (PT Agro Lestari Sentosa)	2023	Balasang Estate	2023	Kalimantan Tengah Province	-
		Jalemo Estate	2023		-
		Kajui Estate (PT Agro Lestari Sentosa)	2023		-
		Manuhing Estate (PT Agro Lestari Sentosa)	2023		-
Sako Mill (PT Adi Tunggal Mahajaya)	2023	Mentaya Estate	2023	Kalimantan Tengah Province	ST-1
		Kuayan Estate	2023		ST-1
		Sako Plasma	2023		-
Padang Halaban Mill (PT SMART Tbk)	2011	Padang Halaban Estate	2011	Sumatera Utara Province	Certified
		Penantian Estate	2011		Certified
		Adipati Estate	2011		Certified
		Kanopan Ulu Estate	2011		Certified
Batu Ampar Mill (PT SMART Tbk)	2012	Batu Ampar Estate	2012	Kalimantan Selatan Province	Certified
		Batu Mulia Estate	2012		Certified
		Sungai Panci Estate	2012		Certified
		Sungai Panci KKPA	2012		Certified
Tanah Laut Mill (PT SMART Tbk)	2012	Tanah Laut Estate	2012	Kalimantan Selatan Province	Certified
		Kinta Pura Estate	2012		Certified
Langga Payung Mill (PT Tapisan Nadenggan)	2012	Langga Payung Estate	2012	Sumatera Utara Province	Certified
		Paya Baung Estate	2012		Certified
		Normark Estate	2012		Certified
Hanau Mill (PT Tapisan Nadenggan)	2012	Hanau Estate	2012	Kalimantan Tengah Province	Certified
		Tasik Mas Estate	2012		Certified
		Tanjung Paring	2012		Certified

		Estate			
		Langadang Estate	2012		Certified
		Medang Sari Estate (PT Satya Kisma Usaha)	2022		-
Semilar Mill (PT Tampilan Nadenggan)	2013	Semilar Estate	2013	Kalimantan Tengah Province	Certified
		Sei Rindu Estate	2013		Certified
		Mandang Estate	2013		Certified
		Puri Estate	2013		Certified
Jak Luay Mill (PT Tampilan Nadenggan)	2015	Pantun Mas Estate	2015	Kalimantan Timur Province	Certified
		Jak Luay Estate	2015		Certified
		Jak Luay KKPA	2022		-
		Long Buluh Estate	2015		Certified
		Bukit Subur Estate	2015		Certified
		Bukit Subur KKPA	2022		-
Leidong West Mill (PT MP Leidong West Indonesia)	2014	Leidong West Utara Estate	2014	Bangka Belitung Province	Certified
		Leidong West Selatan Estate	2014		Certified
Muara Wahau Mill (PT Kresna Duta Agroindo)	2014	Muara Wahau Estate	2014	Kalimantan Timur Province	Certified
		Gunung Kombeng	2014		Certified
Gunung Kombeng Mill (PT Kresna Duta Agroindo)	2021	Gunung Kombeng KKPA	2021	Kalimantan Timur Province	-
Rantau Panjang (PT Kresna Duta Agroindo)	2022	Rantau Panjang Estate	2022	Kalimantan Timur Province	-
		Rantau Panjang KKPA	2022		-
Jelatang Mill (PT Kresna Duta Agroindo)	2014	Bangko Estate	2014	Jambi Province	Certified
Pelakar Mill (PT Kresna Duta Agroindo)	2020	Pelakar Estate	2020	Jambi Province	IC
		Batang Merangin Estate	2020		IC
		Tiga Serumpun KKPA	2022		-
Langling Mill (PT Kresna Duta Agroindo)	2014	Bangko Estate	2014	Jambi Province	Certified
		Batang Gading Estate	2021		-
		Batang Gading KKPA (PT Satya Kisma Usaha)	2022		-
Sungai Bengkal Mill (PT Satya Kisma Usaha)	2015	Sungai Bengkal Estate	2015	Jambi Province	Certified
		Sungai Bengkal KKPA	2015		Certified
		Muara Kilis Estate	2015		Certified
		Muara Kilis KKPA	2022		-
Bukit Kapur Mill (PT SMART Tbk)	2022	Bukit Kapur Estate	2022	Kalimantan Selatan Province	ST-1
		Sungai Cantung Estate	2022		ST-1

	Samsam Mill (PT Ivomas Tunggal)	2009	Samsam Estate	2009	Riau Province	Certified
			Samsam Estate (HGU on progress – 29.09 Ha)	2022		-
			Kandista Estate	2009		Certified
			Kandista Estate (HGU on progress – 158.46 Ha)	2022		-
			Palapa Estate	2009		Certified
	Libo Mill (PT Ivomas Tunggal)	2009	Libo Estate	2009	Riau Province	Certified
			Nenggala Estate	2009		Certified
			Nenggala Estate (HGU on progress 419.9 Ha)	2022		-
			Sei Rokan Estate	2009		Certified
			Sei Rokan Estate (HGU on progress – 102.7 Ha)	2022		-
	Ujung Tanjung (PT Ivomas Tunggal)	2009	Ujung Tanjung Estate	2009	Riau Province	Certified
			Ujung Tanjung Estate (HGU on progress – 557.3 Ha)	2022		-
	Naga Sakti Mill (PT Buana Wiralestari Mas)	2010	Naga Mas Estate	2010	Riau Province	Certified
			Naga Mas Estate (HGU on process – 253.39 Ha)	2022		-
			Naga Sakti Estate	2010		Certified
			Naga Sakti Estate (HGU on process – 59.79 Ha)	2022		-
			Rama Bakti Estate	2010		Certified
	Kijang Mill (PT Buana Wiralestari Mas)	2010	Kijang Mas Estate	2010	Riau Province	Certified
			Kijang Mas Estate (HGU on process – 56.07 Ha)	2022		-
			Kijang Kencana Plasma	2010		Certified
	Ramarama Mill (PT Ramajaya Pramukti)	2010	Ramarama Estate	2010	Riau Province	Certified
			Ramarama Estate (HGU on process – 318.76 Ha)	2022		-
			Amartajaya Plasma	2010		Certified
			Smallholder (Ramarama KKPA)	2021		-
	Indrasakti Mill (PT Meganusa Inti Sawit)	2011	Indrasakti Estate	2011	Riau Province	Certified
			Indrasakti Estate	2011		Certified
			Indragiri Plasma	2011		Certified
			Indrasakti Plasma	2011		Certified
	Bumipalma Mill (PT Bumipalma Lestari)	2012	Bumi Lestari Estate	2012	Riau Province	Certified
			Bumi Palma Estate	2012		Certified



Persada)		Bumi Sentosa Estate	2012		Certified
		Bumi Palma Estate (HGU on process – 39.21 Ha)	2022		-
Sawita Mill (PT Sawitakarya Manunggal)	2021	Sawita Estate	2021	Kalimantan Selatan Province	ST-1
		Pamukan Estate	2021		ST-1
		Sawita KKPA	2021		ST-1
Kenari Mill (PT Bangun Nusa Mandiri)	2023	Gaharu Estate (PT Bangun Nusa Mandiri)	2023	Kalimantan Barat Province	-
		Kenari Estate (PT Bangun Nusa Mandiri)	2023		ST-1
		KerANJI Estate (PT Bangun Nusa Mandiri)	2023		ST-1
		Smallholder (Gaharu Plasma)	2023		-
		Smallholder (Kenari Plasma)	2023	Kalimantan Barat Province	-
Sungai Air Jernih Mill (PT Bahana Karya Semesta)	2022	Sungai Air Jernih Estate	2022	Jambi Province	-
		Sungai Mentawak Estate	2022		-
		Sungai Merak Estate	2022		-
		Sungai Badak Estate	2022		-
<p>There is revision of time bound plan on 02 January 2020 made by Head of Sustainability Policy &amp; Compliance. There are 14 mills which postpone and 2 new mills. There are justification for mills that postpone, with explanation:</p> <ul style="list-style-type: none"><li>- Kasuari Mill and supply bases still in process of EIA (AMDAL) revision and permit for hazardous waste warehouse.</li><li>- Perdana Mill and supply bases are still in process for HGU and RaCP (LUCA review).</li><li>- Kuayan Mill and supply bases are still in process for HGU and RaCP (LUCA review).</li><li>- Tangar Mill and supply bases are still in process for HGU and RaCP (LUCA review).</li><li>- Sungai Kikim Mill and supply bases are still in process of EIA (AMDAL) revision.</li><li>- Sungai Magalau Mill and supply bases are still in process for RaCP (LUCA review).</li><li>- Jalemo Mill and supply bases are still in process for HGU and RaCP (LUCA review).</li><li>- Sako Mill and supply bases are still in process for HGU and RaCP (LUCA review).</li><li>- Bukit Kapur Mill and supply bases are still in process for HGU and RaCP (LUCA review).</li><li>- Rantau Panjang Mill and supply bases are still in process for RaCP (LUCA review).</li><li>- Sawita Mill and supply bases are still in process for RaCP (LUCA review).</li><li>- Gunung Kombeng Mill and supply bases are still in process for land rights.</li><li>- Kenari Mill and supply bases are still in process for HGU.</li></ul> <p>There are some companies that are not fully certified, due to some area still on process to get land title (HGU), consist of:</p> <ol style="list-style-type: none"><li>1. PT Ivomas Tunggal (Samsam Estate, Kandista Estate, Nenggala Estate, Sei Rokan Estate, Ujung Tanjung Estate);</li><li>2. PT Rama Jaya Pramukti (Ramarama Estate);</li><li>3. PT Buana Wira Lestari (Nagasakti Estate; Nagamas Estate and Kijang Estate);</li><li>4. PT Forestalestari Dwikarya (Tanjung Rusa Estate);</li><li>5. PT Djuanda Sawit Lestari (Muara Kandis Estate &amp; Muara Tawas Estate).</li><li>6. PT Sumber Indah Perkasa (Sungai Merah Estate and Sungai Buaya Estate).</li></ol>					

1.10.2	<b>Progress of Associated Smallholders and Outgrowers for Certifiable Standard</b>
	Bumi Palma Mill received FFB from Scheme Smallholders of PT Meganusa Intisawit which is RSPO Certified. Bumi Palma Mill has received FFB from outgrowers, e.g. PT Agrotunggal Jayamandiri and PT Kharisma Riau Sentosa in a short term agreement towards FFB processing.

<b>2.0</b>	<b>ASSESSMENT PROCESS</b>
<b>2.1</b>	<b>Assessment Team</b>
<b>ASA-1.1</b>	<p><b>1. Leonada (Lead Auditor).</b> Bachelor of agriculture for plant breeding and seed technology programme study, department of agronomy, faculty of agriculture in Bogor Agricultural University. Having experience of more than five years working as a plantation operations staff and sustainability in private company of Indonesian oil palm plantations and is currently working on independent certification bodies as auditor. Training have been followed are: training of Indonesian sustainable palm oil (ISPO) lead auditor, training of RSPO lead auditor, RSPO SCCS training, SA 8000, ISO 17021: 2011, ISO 17065: 2012, ISO 19011: 2011, lead auditor ISO 9001: 2008, ISO 14001: 2005, training of management development program agronomy, training of analysis base solution for operation, training of integrated pest management (IPM), use of limited pesticides training, training management of waste pesticides and fertilizers, training mediation and conflict resolution, RSPO social and worker welfare training, general safety specialist training, health and safety management system (SMK3) auditor. In this audit He conducted an assessment on transparency, legal, land dispute, environmental / conservation</p> <p><b>2. Hasiholan Sihombing (Auditor).</b> Indonesian citizen. Bachelor of Agriculture Majoring in Agronomy, Agriculture Faculty. He has working experienced for 7 (seven) years since 2009 as an Operational Staff in an Oil Palm Plantation Company in Indonesia. The training he has followed namely: Lead Auditor ISPO, RSPO P&amp;C Lead Auditor Course by Checkmark, SA 8000 Awareness, Quality Management Systems (ISO 9001:2015), Environmental Management Systems (ISO 14001:2015), OHS General Expert, OHSAS 18001:2007, ISO 19011:2018, ISO 17021:2011 and ISO 17065:2012. He has experienced in various audit activities related to the certification system of sustainable palm oil plantation since 2016. During this audit, he assigned to verify best management practices, long term plan, OHS aspects.</p> <p><b>3. Asystasya Aishah Silalahi (Auditor).</b> Indonesia Citizen, Bachelor of Economy, Major of Agribusiness, Faculty of Economic and Management. She has one year experience in consultancy. She has followed training such as ISPO Auditor Training, Lead Auditor ISO 9001:2015, OHS General Expert, RSPO lead auditor training course, SCCS, and several in house training related to environmental, BMP, SA 8000. Has been involved in several audit activities since 2016 related to sustainable palm oil certification covering waste management aspect, Social Aspect, Health and Safety Aspect, and Worker Welfare. During this audit, she verify Social, Worker Welfare aspects, SCCS and GHG aspects.</p> <p><b>4. Rahmat Abdiansyah (Auditor Trainee).</b> Indonesian citizen, Bachelor of Forestry from the Department of Forest Resources Conservation and Ecotourism, Bogor Agricultural University. Has experience working in the Indonesian Palm Oil Farmers Organization and Indonesian private oil palm plantation companies. Participated in ISPO and RSPO Internal Auditor training in 2018, ISPO Certification Systems IHT and P&amp;C in 2019, and IHT ISO 19011. At this time the audit carried out verification on environmental/conservation and GHG aspects supervised by Lead Auditor.</p>
<b>2.2</b>	<b>Assessment Methodology, Assessment Process and Locations of Assessment</b>
<b>2.2.1</b>	<b>Figure of person days to implement assessment</b>
<b>ASA-1.1</b>	<p>Number of auditors : 3 auditor</p> <p>Number of days for <b>ASA-1.1</b> at site : 5 days</p> <p>Number of working days for <b>ASA-1.1</b> at site : 15 Working days</p>
<b>2.2.2</b>	<b>Assessment Process</b>
<b>ASA-1.1</b>	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Bumipalma Lestari Persada to the requirements of <b>Principles and Criteria for the Production of Sustainable Palm Oil 2018, endorsed by the RSPO Board of Governors and adopted at the 15<sup>th</sup> Annual General Assembly by RSPO Member on 15 November 2018 and RSPO Certification System for Principles and Criteria, 14 June 2017.</b></p> <p>The team traveled from Jakarta to Pekanbaru by airplane and traveled to site by car in first day. After arriving on site, the team continued to held an opening meeting. The opening and closing meeting was held in Guest House attended by the Regional Controller, Production Controller, Estate Manager, Mill Manager, Assistants, and other related</p>

personnel's. During audit activity, auditors always accompanied by management representative and the documents are presented well

The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) interview, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site.

Some opportunities for improvement of the results **ASA-1.1** delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase (**ASA-1.2**). Improvement of observation from previous assesment were observed by auditors at this **ASA-1.1** assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of **ASA-1.1**.

There is no reduction or extension scope. Certification unit also agree with the audit conclusion and the audit is done according to the audit plan.

The assessment program please find Appendix 2

<b>2.2.3</b>	<b>Locations of Assessment</b>
<b>ASA-1.1</b>	<p>Number of units in this certification activity is three (3) estates, which supply the raw material (FFB) to one (1) palm oil mill. The sampling location are one palm oil mill (Bumi Palma POM) and all three estates (Bumi Palma Estate, Bumi Lestari Estate, and Bumi Sentosa Estate).</p> <p><b>Bumi Palma POM:</b></p> <ul style="list-style-type: none"> <li>• <b>Security Post (2 security).</b> Observation and interview with security related personnel understanding over the applicable SOP, the implementation of occupational health and safety, medical examination, trainings from company and worker welfare.</li> <li>• <b>Loading Ramp (6 workers).</b> Observation and interview with sortation personnel related to personel understanding over sortation procedure, the implementation of sortation, fruit criteria, fruit separation with ripeness and rawness criteria.</li> <li>• <b>Sterilizer Station (1 worker).</b> Observation and interview with operator related personnel understanding over the applicable SOP, infrastructure in mill, the implementation of occupational health and safety, medical examination, trainings from company and worker welfare.</li> <li>• <b>Clarification Station (1 worker).</b> Observation and interview with operator related personnel understanding over the applicable SOP, infrastructure in mill, the implementation of occupational health and safety, medical examination, trainings from company and worker welfare.</li> <li>• <b>Press Station (1 worker).</b> Observation and interview with operator related personnel understanding over the applicable SOP, infrastructure in mill, the implementation of occupational health and safety, medical examination, trainings from company and worker welfare.</li> <li>• <b>Boiler Station (2 workers).</b> Observation and interview with operator related personnel understanding over the applicable SOP, infrastructure in mill, the implementation of occupational health and safety, medical examination, trainings from company and worker welfare.</li> <li>• <b>Engine Room Station (1 worker).</b> Observation and interview with operator related personnel understanding over the applicable SOP, infrastructure in mill, the implementation of occupational health and safety, medical examination, trainings from company and worker welfare.</li> <li>• <b>Kernel Station (1 worker).</b> Observation and interview with operator related personnel understanding over the applicable SOP, infrastructure in mill, the implementation of occupational health and safety, medical examination, trainings from company and worker welfare.</li> <li>• <b>Chemical material warehouse (1 Worker).</b> Observation and interview towards technical, pesticides stored, environment, manpower and safety aspects.</li> <li>• <b>Empty bunch area (1 Worker).</b> Field observations related to empty bunch management.</li> <li>• <b>Spare part storage (2 Worker).</b> Observations and interviews related to safe work practices and workers welfare</li> </ul>

- **WWTP (1 Worker).** Observation and interviews regarding the management of POME
- **Water Treatment Plant (1 Worker).** Field observations and staff interviews related to working hours, occupational safety and health (PPE), water sources, water treatment, chemicals used, MSDS, occupational accidents, first aid boxes, health checks, Fire Distinguiher (APAR). and workplace conditions.
- **Hazardous waste storage (1 Worker).** Field observations related to the management of hazardous and toxic materials.
- **Furnace (1 Worker)** Field observations and staff interviews related to working hours, occupational safety and health (PPE), water sources, water treatment, chemicals used, MSDS, occupational accidents, first aid boxes, health checks, Fire Distinguiher (APAR). and workplace conditions.
- **Workshop (2 Worker).** Observation and interviews with employees related to management of hazardous waste and hazardous material, training, provision of PPE, training, emergency response facilities
- **Interviews and Simulations with Emergency Response Groups** Observations related to the preparedness of the emergency response team, the ability and understanding of members, the completeness of the fire prevention equipment.
- **Oil Warehouse (1 Worker).** Observation Hazardouse waste management, MSDS, Symbols and the others

**Bumi Palma Estate:**

- **Block G08 Division 1 (2 harvester and 1 picker).** Observation and interview with harvester related fruit ripeness, safe working practices and also worker welfare.
- **Block H10 Division 2: HGU Pole No. 82.** Observation the conditions and position of legal boundary.
- **Block H09 Division 2: HGU Pole No. 81 and 80.** Observation the conditions and position of legal boundary.
- **Block G01 Division 3: HGU Pole No. 79.** Observation the conditions and position of legal boundary.
- **Block D09 Division 2 (2 Fertilizer Applicator).** Interview with the fertilizer applicator related type of fertilizer use according to the procedure, safe working practices and also worker welfare.
- **Block F09 Division 2 (Peat Area).** Observation peat area, water management, water level monitoring, piezometer monitoring and subsiden pole conditions and staff interviews on monitoring techniques.
- **Block F09 Division 2 (Barn Owl Nest Observation).** To check Barn Owl Nest condition and management of integrated pest control systems conducted by the company.
- **HCV Area Block H10 Division 2.** Observation of HCV management.
- **Block B01 Division 3 (4 Pesticide Applicator).** Observation on safe working practices and interview with the pesticide applicator related type of pesticides use according to the procedure, safe working practices and also worker welfare.
- **Block B02 Division 3 (Watergate).** Observation water management system.
- **Landfill area Block F01 Division 3 (2 Worker).** Observation and interview to supervisor anorganic and organic management, and OHS aspect.
- **Housing Complex Division 2 & 3 (1 Worker).** Observation and interview regarding to feasibility of facilities, complain mechanism, waste management, clean water and access to basic needs.
- **Day Care (2 workers).** Interview related to worker welfare, complain mechanism, and feasibility of facilities
- **Solar tank (1 Worker).** Observation Hazardouse waste management, MSDS, Symbols and the others.
- **Fertilizer Warehouse (2 Worker)** Field observations related to condition of the storge, symbols, MSDS, channels and pesticide spill containers, and pesticide stock, and management of hazardous and toxic materials.
- **Interviews and Simulations with Emergency Response Groups** Observations related to the preparedness of the emergency response team, the ability and understanding of members, the completeness of the fire prevention equipment.
- **Workshop (2 Worker).** Observation and interviews with employees related to management of hazardous.
- **Material Warehouse (1 Worker)**Field observations and interview related to condition of the storge, symbols, MSDS, channels and pesticide spill containers, and pesticide stock, and management of hazardous and toxic materials.
- **Pesticide Warehouse (1 Worker)** Field observations related to condition of the storge, symbols, MSDS, channels and pesticide spill containers, and pesticide stock, and management of hazardous and toxic materials

**Bumi Sentosa Estate:**

- **Block F03 Division 1 (4 Pesticide Applicator).** Observation on safe working practices and interview with the pesticide applicator related type of pesticides use according to the procedure, safe working practices and also worker welfare.
- **Block F04 Division 1 (2 harvester and 2 picker).** Observation and interview with harvester related fruit ripeness, safe working practices and also worker welfare.
- **Block F04 Division 1 (Barn Owl Nest Observation).** To check Barn Owl Nest condition and management of integrated pest control systems conducted by the company.
- **Block J04 Division 2: HGU Pole No. 92 and 93.** Observation the conditions and position of legal boundary.
- **Block J03 Division 2: HGU Pole No. 94.** Observation the conditions and position of legal boundary.
- **Block H01 Division 2 (Peat Area).** Observation peat area, water management, water level monitoring, piezometer monitoring and subsiden pole conditions and staff interviews on monitoring techniques.
- **Block H01 Division 2 (Immature area – Year Plant 2017).** Observation immature area of year plant 2017 and immature area management carried out by the company.
- **Block G03 Division 2 (Fire Tower).** Observation the conditions of fire tower and management of fire observation systems conducted by the company.
- **Solar tank (1 Worker).** Observation Hazardouse waste management, MSDS, Symbols and the others.
- **Observation of Pesticide Houses (1 Worker).** Field observations and staff interview related to the condition and facilities of pesticide houses.
- **Housing Complex Division 1 & 2 (1 Worker).** Observation and interview regarding to feasibility of facilities, complain mechanism, waste management, clean water and access to basic needs.
- **Day Care (1 workers).** Interview related to worker welfare, complain mechanism, and feasibility of facilities.
- **Interviews and Simulations with Emergency Response Groups** Observations related to the preparedness of the emergency response team, the ability and understanding of members, the completeness of the fire prevention equipment.
- **Pesticide Warehouse (1 Worker)** Field observations related to condition of the storge, symbols, MSDS, channels and pesticide spill containers, and pesticide stock, and management of hazardous and toxic materials.
- **Material Warehouse (1 Worker)** Field observations and Interview related to condition of the storge, symbols, MSDS, channels and pesticide spill containers, and pesticide stock, and management of hazardous and toxic materials.
- **Clinic.** Observation and interview towards health facilities provided by company, infectious or medical waste management, housing health condition and manpower aspect.
- **Fertilizer Warehouse (2 Worker)** Field observations related to condition of the storge, symbols, MSDS, channels and pesticide spill containers, and pesticide stock, and management of hazardous and toxic materials.
- **Oil Warehouse (1 Worker).** Observation Hazardouse waste management, MSDS, Symbols and the others.

**Bumi Lestari Estate:**

- **Block H06 Division 1 (4 Pesticide Applicator).** Observation on safe working practices and interview with the pesticide applicator related type of pesticides use according to the procedure, safe working practices and also worker welfare.
- **Block L09 Division 2 (3 harvester and 2 picker).** Observation and interview with harvester related fruit ripeness, safe working practices and also worker welfare.
- **Block L09 Division 2 (Loading FFB process).** Interview with foreman of FFB about loading FFB prosedure, administration, FFB sortation in platform, safety and health and worker welfare.
- **Block L09 Division 2 (Peat Area).** Observation peat area, water management, water level monitoring, piezometer monitoring and subsiden pole conditions and staff interviews on monitoring techniques.
- **Block L09 Division 2 (Barn Owl Nest Observation).** To check Barn Owl Nest condition and management of integrated pest control systems conducted by the company.
- **Block K08 Division 2 (Fire Tower).** Observation the conditions of fire tower and management of fire observation systems conducted by the company.
- **Block L07 Division 2: HGU Pole No. 57.** Observation the conditions and position of legal boundary.



- **Block M07 Division 2: HGU Pole No. 58 and 59.** Observation the conditions and position of legal boundary.
  - **Block L06 Division 2: HGU Pole No. 60.** Observation the conditions and position of legal boundary.
  - **Observation of Pesticide Houses (1 Worker).** Field observations and staff interview related to the condition and facilities of pesticide houses.
  - **Material Warehouse (1 Worker)** Field observations and Interview related to condition of the storage, symbols, MSDS, channels and pesticide spill containers, and pesticide stock, and management of hazardous and toxic materials.
  - **Interviews and Simulations with Emergency Response Groups** Observations related to the preparedness of the emergency response team, the ability and understanding of members, the completeness of the fire prevention equipment.
  - **Solar tank (1 Worker).** Observation Hazardouse waste management, MSDS, Symbols and the others.
  - **Workshop (2 Worker).** Observation and interviews with employees related to management of hazardous.
  - **Housing Complex Division 2 & 3 (1 Worker).** Observation and interview regarding to feasibility of facilities, complain mechanism, waste management, clean water and access to basic needs.
  - **Day Care (1 workers).** Interview related to worker welfare, complain mechanism, and feasibility of facilities.
  - **Landfill area Block G05 Division 1.** Observation domestic waste anorganic and organic management, and OHS aspect.
  - **Fertilizer Warehouse (2 Worker)** Field observations related to condition of the storage, symbols, MSDS, channels and pesticide spill containers, and pesticide stock, and management of hazardous and toxic materials.
  - **Watergate Generator House (1 Worker).** Observation and staff interview about hazardouse maintenance, medical chek up.
  - **Pesticide Warehouse (1 Worker)** Field observations related to condition of the storage, symbols, MSDS, channels and pesticide spill containers, and pesticide stock, and management of hazardous and toxic materials.
  - **Oil Warehouse (1 Worker).** Observation Hazardouse waste management, MSDS, Symbols and the others.
- Stakeholder Consultation Visit:**
- **Government agencies in Indragiri Hilir Regency (Land Office, Environment Agency, and Manpower agency).** Interview related the compliance of law, transparency, worker welfare, environment issue, social aspect, etc.
  - **Public consultation by interview with locals of the nearby village (Lintas Utara, Karya Tani, and Suhada Village).** Interview related the transparency, environment issue, social aspect, etc.

<b>2.3</b>	<b>Stakeholder Consultation and Stakeholders Contacted</b>
<b>2.3.1</b>	<b>Summary of stakeholder consultation process.</b>
<b>ASA-1.1</b>	<p>Consultation of stakeholders for PT Bumipalma Lestari held by:</p> <ol style="list-style-type: none"> <li>1. Public announcement at RSPO and Mutucertification website on 3 February 2020.</li> <li>2. Public consultation by phone with government agencies in Indragiri Hilir Regency (Land Office, Environment Agency, and Manpower agency) on 25 February 2020.</li> <li>3. Public consultation by interview with locals of the nearby village (Lintas Utara, Karya Tani, and Suhada Village), Cooperative and local contractor on 26 February 2020.</li> <li>4. Consultation meeting and interview with Internal Stakeholder (labour union, worker cooperative and gender committee) on 25 February 2020.</li> <li>5. Consultation with NGO (Sawit Watch, Walhi, AMAN and WWF) via email on 17 February 2020.</li> </ol>
<b>2.3.2</b>	<b>Stakeholder contacted</b>
	<i>Please find appendix 1</i>
<b>2.4</b>	<b>Determining Next Assessment</b>
	The next visit ( <b>ASA-1.2</b> ) will be conducted eight (8) month to twelve (12) month after date of annual license.

### 3.0 ASSESSMENT FINDINGS

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

MUTUAGUNG LESTARI has conducted an assessment of Bumi Palma POM – PT Bumipalma Lestari Persada operation consisting of one (1) mill and three (3) oil palm estates. During the assessment, there is no Nonconformity assigned against Major Compliance Indicator raised; no nonconformity assigned against Minor Compliance Indicator raised; and three (3) opportunities for improvement were identified.

MUTUAGUNG LESTARI found that Bumi Palma POM – PT Bumipalma Lestari Persada is complied with the requirements of *Principles and Criteria for the Production of Sustainable Palm Oil 2018, endorsed by the RSPO Board of Governors and adopted at the 15<sup>th</sup> Annual General Assembly by RSPO Member on 15 November 2018 and RSPO Certification System for Principles and Criteria, 14 June 2017*. Therefore MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is *continued*.

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
<b>PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY</b>		
<b>1.1</b>	<b>The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</b>	
<b>1.1.1, 1.1.2, 1.1.5</b>	<p>The company has a list of information for stakeholders in document No. F/SMART/GENERAL/SADV/004/003 which describes the types of information available and stakeholders associated with the document. For example:</p> <ul style="list-style-type: none"> <li>- Number of employee and list of basic wage.</li> <li>- Social impact assessment report</li> <li>- HCV report</li> <li>- Company's policies</li> <li>- Production data</li> </ul> <p>Those public document can be accessed in company's website, keep in office or paste on notice board in estate and mill office. Company also provided public information to stakeholders so it can be accessed by them, for example:</p> <ul style="list-style-type: none"> <li>- Manpower report reported by online every year for all unit, Bumi Sentosa, Bumi Palma, Bumi Lestari Estate, and Bumi Palma Mill</li> <li>- Plantation Development Report 2<sup>nd</sup> semester of 2019 reported to Plantation Agency of Indragiri Hilir Regency on 24 January 2020</li> <li>- Land Use Report periode of 2019 reported to National Land Agency of Indragiri Hilir Regency on 6 February 2020.</li> </ul> <p>Company also make list of stakeholder which describe name of stakeholder, contact number, and address. The list is consist of statutory bodies of Indragiri Hilir Regency, representative of surrounding community, internal stakeholder of PT BPLP, and police. This document is updated at least once a year of if there're any changes from stakeholder. The latest list of stakeholder is updated on 2 January 2020. Based on interview with statutory bodies of Indragiri Hilir Regency, it is known that they aware the type of document that can be accessed publicly and how to access those documents</p>	
<b>1.1.3, 1.1.4</b>	<p>Mechanism for consultation is listed in Consultation and Communication Procedure (SOP-SMART-UMUM-SADP-I-004) dated July 1<sup>st</sup>, 2016. The procedure explain that all the information request will be responded by Certification holder not more than 3 weeks after the incoming letter. The person in charge for communication and consultation is manager and unit head.</p> <p>All information request has documented on communication book. The information request majority about assisting request. For example letter from Mosque Committee of Danau Pulau Indah Village on 1 November 2019 and responded by company on 4</p>	



November 2019. Then, on 23 December 2019 company send the assistance to Mosque Committee of Danau Pulai Indah Village as requested. Based on interview with statutory bodies of Indragiri Hilir Regency and representative of Suhada, Karya Tani, and Lintas Utara Village, it is known that they understand how to communicate and consult with company.

**Status: Comply**

## 1.2

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

#### 1.2.1 & 1.2.2

Company has a code of conduct written on Sinarmas Agri Business and Food Business and Human Rights Policy that was signed by the Head of Policy and Compliance Division on December 12, 2019. The policy explains that GAR is committed to respecting human rights in all lines of operations. In implementing human rights policies and conducting responsible business, GAR is committed to:

- Respect workers' rights and dignity in accordance with legal provisions, provide fair treatment without discrimination and establish harmonious industrial relations.
- Respect and protect the rights of whistleblowers and human rights defenders.
- Perform recovery measures and resolve negative impacts if there are human rights violations through a transparent and legal process.
- Prevent the practice of forced labor and not use workers as a result of human trafficking.
- Creating safe and healthy work area conditions and providing environmental protection.

The ethical conduct policy has implemented in every operational activity and monitored by the company, for example:

- Maintain the anonymity of each complainant
- Accept workers without discrimination in accordance with company needs.
- Guarantees OHS at work, for example using PPE at work
- Employees work according to their respective duties and responsibilities.

Based on interview with worker and local contractor, they are aware about this policy and has implemented it in everyday activity.

**Status: Comply**

## PRINCIPLE #2 OPERATE LEGALLY AND RESPECT RIGHTS

## 2.1

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

#### 2.1.1

The Company has list of regulations of 2020 that includes local regulations and national regulation updated annually. List of laws/regulations listed has covers several aspects such as land permit and legality, manpower, occupational health and safety, best management practices and environment. Some examples of regulations compliance that have been done such as plantation bussines permit (No. 758/Menhutbun-VIII/2000 dated 29 June 2000).

The other compliances of regulations are regarding to environment aspects are EIA management and monitoring in routinely, hazardous waste storage license approved by local government. Compliances of workers and OHS regulations are provided the minimum wage, company safety & occupational health, transporting and forklift operator etc. Based on interview with stakeholders such as government agencies it is known that the company has comply the related regulations for example: has plantation business permit, land use right, no workers under age of 18, land application permit, hazardous waste storage permit etc.

The company has a toxic and hazardous waste storage permit based on the decision of the head of the investment agency and one-stop integrated service in Indragiri Hilir district number 503 / DPMTSP-IPSL. B3 / 4 dated October 20, 2017, which is valid for 5 years. Toxic and hazardous storage is located at coordinates 102°59'0.54"BT and 0°35'51.99 " LS. Types of toxic and hazardous waste that are permitted to be stored: solid waste (cloth rags, used batteries, used filters, used lights, catrige, chemical packaging and liquid waste (used oil). All toxic and hazardous waste is stored according to type and characteristics, avoid spills / spills, record every toxic and hazardous waste transfers in and out and submit quarterly reports to Environment Agency of Indragiri Hilir Regency

In the toxic and hazardous waste storage permit the company does not cover medical waste storage, therefore the Company has sent a letter requesting additional types of toxic and hazardous waste which will be stored in toxic and hazardous waste storage PT. BPLP to the Environmental Service of Indragiri Hilir Regency on December 23, 2019 and has been received by Environment Agency of Indragiri Hilir Regency. Company need to ensure the application for a permit to add a hazardous waste type (OFI).

### 2.1.2

Procedure of legal requirement which presented in document SOP/SMART/UMUM/SADV//002, dated 1 July 2014 mentioned that sustainability officer has responsibility to arranged and monitored legal related laws and/or regulation. Internal audit of regulations compliance is conducted annually as example on 16 September 2019. The procedure mentioned that in order to monitor and update of laws and/or regulations, the sustainability officer required to actively check and make coordination with Government Agencies or Institutions.

### 2.1.3

Procedure of legal boundary poles monitoring and maintenance is presented in document No. SOP/SMART/CERS-EHSD/SADV//004 dated 1 July 2014. Procedure mentioned that maintenance was carried out by foreman with supervision of Assistant Manager. Estate management were able to shows location of boundary poles map as well as its coordinate points, which presented in document of Specific Situation Map No. 02/1995 of PT Bumipalma Lestari Persada dated 30 March 1995 with scale 1:25,000. Boundary poles monitoring record period 2019 informed that from totaling 131 poles monitored it was identified 32 poles in Bumi Palma Estate, 55 poles in Bumi Lestari Estate and 44 poles in Bumi Sentosa Estate were in good condition and satisfactory maintained.

Based on field observation to Poles No. 92, 93 block J04 and No. 94 block J03 (Bumi Sentosa Estate), No. 57 block L07, No. 58, 59 block M07, No. 60 block L06 (Bumi Lestari Estate), No. 79 block G01, No. 80, 81 block H09, No. 82 block H10 (Bumi Palma Estate), it could be concluded that estate management has monitor their boundary legal poles, clearly demarcated and visibly maintained. Verification using GPS indicates that the pole coordinate is in accordance with the provisions of the land title and confirmed that there has been no planting beyond the legal demarcated boundary areas of the plantation.

<b>Status: Comply</b>
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## 2.2

**All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.**

### 2.2.1, 2.2.2, 2.2.3

Company has list of contractor for each estate and mill which informing name of contractor, address, and service provided by contractor. Besides the contractor, company also cooperate with FFB supplier from third party. All form of cooperation is based on work agreement which signed by both parties.

Company showed the example of work agreement with contractor and FFB supplier, such as:

- Agreement No. 001 / BPLP / BPMM / 01/2020-CPO dated January 2, 2020 between PT Bumipalma Lestari Persada and PT Sumber Kencana Inhu as a CPO transportation contractor. The contract explains the object of work, time period, price and method of payment, tax and BPJS, etc., and signed by both parties party. There is also a statement from PT Sumber Kencana Inhu dated February 24, 2020 stating that they are willing to comply with the conditions required in the certification of sustainable palm oil, such as complying with labor, environmental, OSH regulations, complying with company business ethics, obeying the prohibition of employing children, forced labor and workers from human trafficking, and follows all the requirements in the certification standard.
- Agreement with FFB Supplier PT Agrotunggal Jayamandiri on 10 February 2020 which explain about time periode, price and method of payment, dispute resolution, etc., and signed by both parties. PT Agrotunggal Jayamandiri also has a statement dated 10 February 2020 stating that they are willing to comply with the conditions required in the certification of sustainable palm oil, such as complying with labor, environmental, OSH regulations, complying with company business ethics, obeying the prohibition of employing children, forced labor and workers from human trafficking, and follows all the requirements in the certification standard.

Based on interview with contractor, they are aware about the compliance with legal requirements. And also, based on document review of contractor document and field observation in estate and mill, it is known that they are comply with the legal requirements.

For example provides PPE for contractor worker wherever they are in company operational area, auditor didn't see any child labor, and wages for contractor worker has been paid in accordance with applicable regulation.

**Status: Comply**

### 2.3

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

#### 2.3.1 & 2.3.2

Apart from own plantations (Bumi Palma Estate, Bumi Sentosa Estate, and Bumi Lestari Estate), the company receives FFB supplies from other parties, namely PT. Agrotunggal Jaya Mandiri and PT. Kharisma Riau Sentosa which is engaged in the palm oil industry and its derivatives. PT Agrotunggal Jaya Mandiri and PT Kharisma Riau Sentosa apart from the plantation, also obtained FFB from several agents appointed as FFB collectors from farmers. The appointed agents will describe below.

Agent Herawati Rohdaeni Simbolon whose address is Telaga Sam-sam Village, Sub-District Kandis. There is a statement from agent that the FFB supplied to Bumi Palma Mill is FFB originating from the farmers own land /private/individual family. There is information on land ownership and coordinates of farmers who supply fruit to agents. Total area of farmers who supply FFB to agents is 316,75 Ha. there is also evidence of payment of FFB to the agent. Some information of land ownership and coordinates of farmers as an example below:

1. Sarkawi with proof of ownership of land SHM-577/2007 located in Bagan Jaya Village, Indragiri Hilir District with coordinate points 0°35'22,1" S and 102°58'53,6" E with an area of 4.00 Ha.
2. Sugino with proof of ownership of land SHM-587/2007 located in Bagan Jaya Village, Indragiri Hilir District with coordinate points 0°35'27,4" S and 102°58'53,1" E with an area of 1.50 Ha.
3. Dayat/H. Misno with proof of ownership of land SHM-734/1980 located in Bagan Jaya Village, Indragiri Hilir District with coordinate points 0°34'31,0" S and 102°58'21,6" E with an area of 3,00 Ha.

Agent Elsa Yunia Veronica whose address is Bagan Jaya Village, Sub-District Enok. There is a statement from agent that the FFB supplied to Bumi Palma Mill is FFB originating from the farmers own land /private/individual family. There is information on land ownership and coordinates of farmers who supply fruit to agents. Total area of farmers who supply FFB to agents is 118 Ha. There is also evidence of payment of FFB to the agent. Some information of land ownership and coordinates of farmers as an example below:

1. Tekun with proof of ownership of land SHM located in Sei Rukam Village, Indragiri Hilir District with coordinate points 0°32'40,5" S and 102°59'13,5" E with an area of 4.00 Ha.
2. Sauji with proof of ownership of land SHM located in Bagan Jaya Village, Indragiri Hilir District with coordinate points 0°32'27,8" S and 102°58'44,3" E with an area of 1.50 Ha.
3. Garman with proof of ownership of land SHM located in Sei Rukam Village, Indragiri Hilir District with coordinate points 0°33'20,5" S and 102°58'34,5" E with an area of 5,50 Ha.

**Status: Comply**

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

#### 3.1

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

#### 3.1.1, 3.1.2

The company has documents on the long-term plan contained in the PT Bumipalma Lestari Persada Feasibility Analysis period 2020-2024 that explain about business plan and operational management which includes: area statement, projections for production, CPO, PK, Revenue CPO and PK, forecast prices, cost estimates, mill costs, profit and loss, and net profit and loss. Based on interview with management unit, PT BPLP has completed replanting activities in 2017, so there are no more replanting program.

#### 3.1.3

The company's annual report is available in the Management Review document which informs the discussion of the annual performance achievement of monthly plantation production, CPO production, Kernel production and other achievements in both the plantation and factory units, for example, which was carried out on 9 January 2020 by PT BPLP Management. An evaluation of the achievements of the current year has been carried out every year, as a material consideration in the preparation of the next year's budget.

	<b>Status: Comply</b>	
<b>3.2</b> <b>The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.</b>		
<b>3.2.1</b> The company has taken actions for continuous improvement, namely: Environmental aspects: 1. Testing the quality of liquid waste and air quality and maintaining the quality of liquid waste and air during 2019 is always below the quality standard. 2. Implement Zero Burning policy in plantation management and supported with adequate fire facilities. 3. Perform surface water management into consumable water and distribute it to all employees.  <b>3.2.2</b> The RSPO metric template for continuous monitoring and improvement has not been established. The company did not carry out remediation and compensation procedures because there was no new land development that the company did after November 2018 so it did not report the RaCP procedure to the RSPO. The company has reported GHG 2019 to the RSPO through the February 2020 GHG RSPO website.		
	<b>Status: Comply</b>	
<b>3.3</b> <b>Operating procedures are appropriately documented, consistently implemented and monitored.</b>		
<b>3.3.1</b> PT Bumipalma Lestari Persada has documents of SOP Technical of Oil Palm Cultivation starting from land clearing up to harvesting, approved by SMD Ops and entered into force on 12 June 2012. The SOP documents among others about planning of new area planting, replanting plans, nurseries, land clearing, planting, replanting, pest and disease control, weed control, fertilization, maintenance of immature plant, preparation ahead of harvest, harvesting, loading and transportation of FFB. The Oil Mill has SOPs covering all mill operations such as FFB Grading, Sterilization Station, Press Station, Threshing Station, Oil Room, Kernel Plant, Laboratory, CPO & PK Despatch, Engine Room, Boiler Room, Electrical, Workshop as well as Raw and Boiler Water Treatment Plant. That SOP's is available on audit site (Estate and Mill office) and written in a language that is easily understandable for workers (written in Bahasa). The entire procedure both of plantation and mill has been included of safe working instruction, other than those described in the HIRAC document.  Interviews were conducted to harvesters, pesticides applicators, and manuring workers in BPME, BPLE and BSNE and also operators in BPMM. Based on the results of interviews can be concluded that the workers understand the duties and responsibilities of their work in accordance with the applicable SOP.  <b>3.3.2</b> The company has a procedure associated with operational internal audit in the SOP No. SOP-ISCC/IMT/OIA. The SOP approved by VPA and VPM, entered into force on 1 July 2011. Ensuring consistency of procedures implementation, the suitability and effectiveness of the procedure, suitability with regulatory updates and best practices, the companies routinely conduct internal audit activities both agronomic and processing. It is held by the Department of Operational Internal Audit (OIA) every semester. The records of internal audit in second semester of 2019 has been documented, for example in BPMM conduct from 23-30 July 2019. Non compliance records of internal audit has been corrected and verified by management.  Each unit has documented the operations of the estate and mill production such as daily reports, supervisor workbooks, etc. The field visit at the mill shows that the unit has been documenting the daily activities in a daily production report that documented by using computerized systems.		
	<b>Status: Comply</b>	
<b>3.4</b> <b>A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing</b>		

**operations.****3.4.1**

Until the ASA 1.1 audit activity was conducted, there were no additional new are in the PT. BPLP. The company has an environmental document in the form of Environmental Evaluation Study (DEL), based on approval from the Departement of Agriculture's AMDAL Commission No. RC.220/713/B/V/1993 on May 5, 1993. The SEL document includes a study of 8000 Ha of study area and the construction of a palm oil mill with capacity of 30 tons of FFB/Hour. In 2017, due to a planned replanting activity and a plan to increase the capacity of Mill from 30 tons FFB/Hour to 45 tons FFB/Hour the company re-compiled environmental addendum documents. This document has obtained an environmental permit based on the decision of the Regent of Indragiri Hilir with number KPTS 473 / VII / HK-2017 dated July 13, 2017 concerning the environmental feasibility of PT Bumi Palma Lestari Persada's palm oil plantation activities. This document was prepared by PT Mitra Riau Lestari.

Based on document review know that the activities managed and monitored by the company are water level, peat subsidence, surface water quality, potential for land fires, air quality, noise, Increased Pests and Plant Diseases, employment and increased income. Based on the review of the environmental evaluation study Terms of Reference document (KA-SEL) published in 1992 by the Head of the Planning Bureau / sectarian of the AMDAL Central Commission, Ministry of Agriculture No. BAG / Amdal / IX / 92 note that the preparation of the KA - SEL has involved stakeholders from nearby villages such as Sungai Rukam Village, Sebrang Sablar Village and Pengalihan Village. Several types of significant impacts that will arise as a result of the company's operations have been identified and there are plans to reduce these significant impacts.

The company already has a social impact identification document which is the 2013 BPLP Plantation and Palm Oil (SIA) Social Impact Identification Study by the SIA - CSR Department Department of Sustainability Division conducted by involving the affected parties. Available records of the socialization / Public Consultation Social Impact Assessment (SIA) meeting, on 11 May 2013 with 40 participants, including representatives from surrounding villages, community leaders and representatives from PT BPLP. Evidence of community involvement in the form of attendance lists, photos of implementation and sample attachments to the questionnaire in the SIA document for Karya Tani and Suhada villages on March 23, 2013. The assessment method was carried out using a questionnaire list that had been prepared through an interview and data measurement system.

**3.4.2 & 3.4.3**

The company has an environmental management plan set out in the RKL-RPL documents for wich significant impacts are managed and monitored are as follows:

- Excessive land subsidence
- Hydrological Change
- Declining water quality
- Noise, Odor, Vibration and Air quality impairment disorders.
- Fire hazard arises
- Increased pests and plant diseases
- Job creation and increase in income.

PT BPLP Environmental Management and monitoring implementation is carried out every 6 months. Implementation of environmental management and monitoring in semester 2 of 2019 PT. The BPLP was implemented and reported to the Inhil District Environmental Agency on February 19, 2020.

The company already has a social impact identification document which is the 2013 BPLP Plantation and Palm Oil (SIA) Social Impact Identification Study by the SIA - CSR Department Department of Sustainability Division conducted by involving the affected parties. Available records of the socialization / Public Consultation Social Impact Assessment (SIA) meeting, on 11 May 2013 with 40 participants, including representatives from surrounding villages, community leaders and representatives from PT BPLP. Evidence of community involvement in the form of attendance lists, photos of implementation and sample attachments to the questionnaire in the SIA document for Karya Tani and Suhada villages on March 23, 2013. The assessment method was carried out using a questionnaire list that had been prepared through an interview and data measurement system. The SIA report describes the negative and positive impacts of plantation operations and is also complemented with Negative Impact Management Recommendations and Positive Impact Enhancement Recommendations.



Implementation of management and social monitoring of PT BPLP for the period 2018-2019 is presented as follows:

- Type of negative impact: lack of information on employment opportunities in the company to the community. The activity carried out was the delivery of information to the surrounding village community which was done verbally to the surrounding stakeholders. The management and monitoring period is carried out in one year.
- Type of negative impact: the existence of labor settlement conditions that have begun to be damaged. Activities undertaken are doing routine maintenance for cottage units that need repairs. The management and monitoring period is carried out in one year.
- Type of negative impact: there are concerns from the community around PT. BPLP is related to replanting activities. The activity carried out is to disseminate replanting activities carried out to the public. The management and monitoring period is carried out in one year.
- Type of positive impact: existence of road maintenance assistance for access and mobilization for surrounding communities. The activity carried out is to take care of the company's roads that are utilized by the village community around the company's operational area. The management and monitoring period is carried out in one year.
- Type of positive impact: an increase in the community's economy through industrial relations (absorption of local labor). The activity carried out is to provide information on job vacancies to local stakeholders. The management and monitoring period is carried out in on year.
- Type of positive impact: development of economic activities of local communities. Activities undertaken are utilizing service providers of goods / services that are around the company. The management and monitoring period is carried out in on year.
- The of positive impact: social assistance. Activities undertaken are making plans and CSR realization. The management and monitoring period in carried out in one year.
- The of positive impact: health assistance and attention for employees and the community. The activity carried out is to carry out periodic inspections of the company's workforce. The management and monitoring period is carried out in one year.

The company has conducted a review of the social impact of PT. BPLP in November 2019 was conducted together with company stakeholders and around the company. The plans for managing and monitoring social impacts in 2020 are:

1. Negative Impact:
  - The need for renovation of employed homes
  - Concern about replanting activities carried out by the company.
2. Positive impact:
  - Meeting the needs of community life through social assistance that is Charity
  - Improvement of the community economy in agriculture through the existence of CSR programs
  - Community empowerment in developing local economic businesses in the filed of goods and services.
  - Increasing the community's economy in the recruitment of local workers.

<b>Status:</b>	
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### 3.5

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

##### **3.5.1, 3.5.2**

Company shows the recruitment mechanism in the Manpower Recruitment Policy with the policy number KHI-smart / 001-01 established on March 1, 2018. General provisions for recruitment include not differentiating between race, caste, nationality, religion, disability, gender, not accepting prospective workers under the age of 18, and other provisions. Provisions related to termination of employment are written in the CLA. Based on interview with representative of worker union and worker in estate and mill, they are aware about their rights and obligation as worker, as written in CLA. CLA also has socialized to the worker and also available for worker and worker union.

Based on interview with worker in estate and mill, they are understand the mechanism of recruitment and worker status. Worker status in PT BPLP is permanent worker and contract worker. However, there are some worker knows and understand about promotion of worker status or class mechanism and other workers don't understand about promotion of worker status or class mechanism. So, company could increase worker knowledge about promotion mechanism (**OFI**).

Company shows the example of recruitment document for the latest recruitment, such as application letter, CV, copy of diploma, photo, copy of ID card, family card, and the copy of work agreement for contract worker. These document is kept in each unit office.

	<b>Status: Comply</b>	
<b>3.6</b> <b>An occupational health and safety (H&amp;S) plan is documented, effectively communicated and implemented.</b>		
<b>3.6.1</b> <p>The company has a policy of occupational safety and health were written in Bahasa. The policy has been legalized and updated on 1 November 2013 by President Director of PT SMART. This policy is designed to control hazards in every activity that is in the working environment to prevent accidents and occupational diseases. Management have work program of occupational health safety every year. Realization of the program of work will be monitored through regular meetings Guiding Committee of Occupational Safety &amp; Health every month. This work program applies generally to all workers in the workplace. If the plans have been made yet on target then will be evaluated in the management review to assess effectiveness.</p> <p>The company shown the document of hazard identification, risk assessment and risk control which issued on January 2020. It will be reviewed if any occupational accident happen. The document describes the description/activity, potential hazards, risk assessment and risk control. Based on site observation at workshop in BPMM and agrochemical warehouse in BPME, BPLE and BSNE, it was clearly confirmed that workers had been aware related potential risk and hazards in the work place. Following up on this, the company has been reduce the potential risk by routine socialization about OHS, providing PPE, and OHS signboard are available in workplace.</p> <p>Interviews were conducted to estate workers (harvester and pesticides applicator) and mill workers (boiler operator, engine room operator, kernel operator, etc.). Based on the results of interviews can be concluded that workers understand the OHS policy and it's recognized that every morning meeting is always affirmed about the importance of safety and the use of PPE in work.</p> <b>3.6.2</b> <p>The company can show the OHS program or plan that has been made in the 2019 period and for the 2020 period. For the 2019 period, the company has shown evidence that it has realized the program, for example the monitoring of fire extinguishers and the first aid kit conducted every month, conducting a fire control socialization once a year and the socialization of OHS every month. The OHS Program in 2020 is currently in progress as planned.</p> <p>The effectiveness and evaluation of the realized programs is carried out through Committee of Occupational Safety and Health (P2K3) meetings which are held monthly. Based on information from the P2K3 secretary of the MIII and Estates, it is explained that if there is a program that is not achieved according to the target set, then it will be evaluated in routine monthly meetings to set a new program in the following year.</p>		
	<b>Status: Comply</b>	
<b>3.7</b> <b>All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.</b>		
<b>3.7.1, 3.7.2, 3.7.3</b> <p>Company has training program for workers for period of 2019 for operational training, including training for worker exposed to high noise level in mill. The aspect in the training program are such as environment, labor best management practice aspect, and others. Training for contractor is including in training program for worker and adjusted with the work of contractor. Some of training program, namely:</p> <ul style="list-style-type: none"> <li>• Awareness of RSPO, ISPO, OHS, and ISCC.</li> <li>• Socialization of GSEP</li> <li>• Socialization of chemical handling, hazardous material, and hazardous waste.</li> <li>• Etc.</li> </ul> <p>Based on interview with worker in estate and mill, they have received some training related to their work, such as work procedure training, emergency response, and first aid training. The training has been documented into minutes of meeting, list of attendees, and photo activity. PT BPLP also has conducted training regarding awareness of RSPO P &amp; C to the workers. Some of the example of training are:</p> <ul style="list-style-type: none"> <li>• Socialization of GSEP, ISCC, RSPO, and ISPO for contractor worker and FFB supplier on 31 October 2019 attended by 19</li> </ul>		

worker from Bumi Palma Mill

- Socialization of ethical conduct and GSEP on 19 and 29 June 2019 attended by Bumi Sentosa Estate worker.
- Socialization of RSPO, ISPO, ISCC, OHS Policy and GAR Policy on 16 April 2019 attended by Bumi Palma Estate workers.
- Socialization of harvesting work instruction and loose fruit picking work instruction on 23 September 2019 attended by Bumi Sentosa Estate Workers
- Socialization/training of RSPO and SCCS for SCC PIC (weightbridge clerk, production clerk, grading workers, security, and CPO and PK dispatch operator) on 20 December 2019.

**Status: Comply**

### 3.8

#### Supply Chain Requirements for Mills

##### 3.8.1 & 3.8.2

The site is applied supply chain model Mass Balance due to it still received FFB from uncertified sources. FFB's suppliers to Bumi Palma Mill are:

- PT Bumipalma Lestarpersada (RSPO certified).
- PT Bumipalma Lestarpersada (39.21 Ha RSPO non-certified).
- PT Kharisma Riau Sentosa (RSPO non-certified).
- PT Agro Tunggal Jaya (RSPO non-certified)

##### 3.8.3

Estimate product certified CPO and PK for period 25 April 2020 – 24 April 2021 describe at ASA-1.1 report (basic info 1.8.3). Actual tonnage product certified for period 25 April 2019 – 24 April 2020:

Products	Period of 25 April 2019 – 24 April 2020 (tonnes/year)	
	Estimate	Actual <i>*(12 months before audit: February 2019 – January 2020)</i>
FFB Certified	103,500	102,896.77
CSPO	26,230	22,411.81
CSPK	5,760	5,473.33

The actual certified production above on the table are the production of 12 months before audit. CH has been reported to the CB regarding to extend the volume on 25 February 2020.

##### 3.8.4

All transactions have been registered in RSPO IT platform for periods 12 months including a removing stock of certified product sold under other scheme (ISCC) and there are no volumes sold as conventional, or in case of underproduction, loss or damage, as example:

- Certified CPO sold to PT Ivomas Tunggal – Lubuk Gaung dated 29 January 2020 for 1,001.63 ton
- Certified Palm Kernel sold to Rama Rama KCP dated 30 January 2020 for 363.19 ton
- Removing stock dated 17 December 2019 for 1,096.10 ton

##### 3.8.5

Bumi Palma Mill has the documents of SCCS procedures for Mass Balance models with document No. BPMM/SOP/23 revision 15 November 2019. The procedures established and covering all elements of the supply chain model requirements, records and reports of compliance with supply chain requirements including responsibilities of each key personnel involved, definition, the FFB reception process, weighing, checking quality, processing, monitoring refined products, mass balance calculations, delivery of the product. The procedure is according to RSPO SCCS 21 November 2014, revised 14 June 2017 and criteria of 3.8 RSPO P n C 2018.

Based on interviews with mill clerk note that the clerk understands the separation between FFB certified and non certified. It was known that certified FFB from PT BPLP owned estate were received and measured in weigh-bridge with capacity 20 ton, while FFB from outsider and "long-strip" areas (which was certified areas of PT BPLP) were received in weigh-bridge with capacity 40 ton.



Software program of "Weighbridge" has used by operator to classified and separate RSPO certified and non-certified products.

### 3.8.6

The Procedure to conduct annual internal audit are describe in SOP for internal audit No. SOP/SMART/UMUM/SADV//009 issued on 1 July 2014 covering all audit for sustainable palm oil including SCCS. In the SOP mentioned that internal audit is done annually. Internal audit of SCCS conforms to the requirements in the RSPO SCCS and the RSPO market communications and claims documents and effectively implements and maintains the standard requirements. The last internal audit is conduct at 14 – 19 October 2019.

### 3.8.7

The site has verified and documented the volumes of certified and non-certified FFBs received. Certified and non-certified FFB received period of 12 months before audit which is February 2019 – January 2020:

Month	FFB (ton)		
	RSPO Certified	Non Certified	Total
February 2019	6,880.70	3,928.41	10,809.11
March 2019	7,760.05	4,289.49	12,049.55
April 2019	7,634.68	4,737.80	12,372.48
May 2019	7,048.38	4,947.02	11,995.39
June 2019	8,526.10	2,303.63	10,829.73
July 2019	9,839.81	4,941.78	14,781.59
August 2019	9,541.01	4,790.55	14,331.56
September 2019	9,208.64	5,529.63	14,738.27
October 2019	9,532.47	5,384.11	14,916.57
November 2019	8,446.52	3,665.69	12,112.20
December 2019	10,107.69	5,573.00	15,680.69
January 2020	8,370.73	4,485.97	12,856.70
Total	102,896.77	54,577.07	157,473.84

The Mill has no purchased CSPO or CSPK. However, The SOP of handling non-conforming oil palm products of FFB received (certified or non-certified) describe in supply chain procedures for Mass Balance models with document No. BPMM/SOP/23 revision 15 November 2019. Non-conforming of oil palm product has described as a false in FFB received notes (certified or non certified) and regarding of FFB received records. To handling on this non-conforming are to corrected the record base on FFB source (certified or non certified areas) and monitored by mass balance record documents.

### 3.8.8

The site has product information provided in such as document of weighbridge ticket, delivery order and other invoices as example at invoices of CPO certified delivery on 5 February 2020 for 20.82 ton and CSPK certified delivery on 8 January 2020 for 16.77 ton. The informations provided on invoices are:

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

### 3.8.9, 3.8.10 & 3.8.11

The company has an agreement No. 001/BPLP/BPMM/01/2020-CPO with a third party in terms of transporting CPO (PT. Sumber Kencana Inhu). CPO transportation contract has a clause regarding the fulfillment of RSPO SCCS and ensure that certification bodies have acces to the outsourcing contractor. The transporters have complies to the requirements of the RSPO Supply Chain Certification Standard show in contractor control form (Formulir/Smart/MCAR/XVI/TA-PKT/03 issued 26 March 2012 revised 1

February 2019). The site has recorded the names and contact details of contractor used for the processing or physical handling of RSPO certified oil palm products and there is no new contractor use in handling certified product at ASA-1.1. A contractor used (names and contact details) has been informed to the CB, such as PT. Sumber Kencana Inhu (CPO Transporter), address: Riau.

### 3.8.12

The site has maintained accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements. The retention times for all records and reports are keep in minimum 10 years According to the SOP no. SOP/SMART/UMUM/SADV/I/001. Based on documents verification, there is available at mill the record of supply chain for last 2 years.

FFBs, CSPO and CSPK produced and/or claimed records are kept in minimum 12 months. Record of all certified palm oil / palm kernel oil volumes purchased (input) and claimed (output) for period of 12 months before audit (February 2019 – January 2020):

Period	CPO production (MT)			CSPO Dispatch (MT)			
	Cert	Non Cert	Total	RSPO	Other scheme (ISCC)	Non Cert	Total
Feb 2019	1,611.35	1,038.73	2,650.08	1,521.57	-	-	1,521.57
Mar 2019	1,623.88	889.27	2,513.15	1,368.36	-	-	1,368.36
Apr 2019	1,507.29	935.26	2,442.55	1,677.88	-	-	1,677.88
May 2019	1,436.74	983.75	2,420.49	1,448.80	-	-	1,448.80
Jun 2019	1,759.11	481.94	2,241.05	1,758.85	-	-	1,758.85
Jul 2019	2,102.17	1,057.44	3,159.61	294.11	1,848.16	-	2,142.27
Aug 2019	2,108.97	1,048.45	3,157.42	-	2,107.22	-	2,107.22
Sep 2019	2,056.61	1,233.51	3,290.12	-	2,010.80	-	2,010.80
Oct 2019	2,147.70	1,222.24	3,369.94	1,270.74	816.61	-	2,087.35
Nov 2019	1,982.44	854.69	2,837.13	1,735.93	448.20	-	2,184.13
Dec 2019	2,193.88	1,187.49	3,381.37	405.82	1,645.50	-	2,051.32
Jan 2020	1,881.67	1,000.94	2,882.61	1,963.25	-	-	1,963.25
Total	22,411.81	11,933.71	34,345.52	13,445.31	8,876.49	-	22,321.80

Period	PK production (MT)			CSPK Dispatch (MT)			
	Cert	Non Cert	Total	RSPO	Other scheme (ISCC)	Non Cert	Total
Feb 2019	469.29	270.61	739.90	416.07	-	-	416.07
Mar 2019	399.75	220.29	620.05	301.90	-	-	301.90
Apr 2019	388.38	241.24	629.61	415.47	-	-	415.47
May 2019	359.92	253.00	612.92	423.58	-	-	423.58
Jun 2019	435.26	117.52	552.78	296.82	-	-	296.82
Jul 2019	508.95	256.75	765.69	585.73	-	-	585.73
Aug 2019	486.23	243.82	730.05	465.20	-	-	465.20
Sep 2019	472.09	283.39	755.48	371.68	-	-	371.68
Oct 2019	488.81	275.96	764.77	591.42	-	-	591.42
Nov 2019	477.10	209.88	686.98	538.97	-	-	538.97
Dec 2019	546.66	302.30	848.96	460.51	-	-	460.51
Jan 2020	440.89	236.05	676.94	490.60	-	-	490.60
Total	5,473.33	2,910.80	8,384.13	5,357.95	-	-	5,357.95

### 3.8.13 & 3.8.14

The site doesn't apply a conversion rate.

**3.8.15**

The site is applied supply chain model Mass Balance due to it still received FFB from uncertified sources. The mill has procedure to ensure the verification of certified FFB and uncertified FFB received at mill. The procedure is No. BPM/SOP/23, revision 15 November 2019, explaining that:

- The source or supplier of FFB received by the mill can be classified into 3: Own estates (certified or non certified), smallholder scheme and individuals FFB.
- All FFB suppliers has recorded /recapitulated/and maintained its current status.
- Suppliers of certified FFB as a sustainable raw material that can be identified or given information that differentiates it from non-certified suppliers.

**3.8.16 & 3.8.17**

RSPO IT Platform member registration number for Bumi palma Mill is RSPO\_PO1000001064. All transactions have been registered in RSPO IT platform for periods Period of 12 months including a removing stock of certified product sold under other scheme (ISCC) and there are no volumes sold as conventional, or in case of underproduction, loss or damage, as example:

- Certified CPO sold to PT Ivomas Tunggal – Lubuk Gaung dated 29 January 2020 for 1,001.63 ton
- Certified Palm Kernel sold to Rama Rama KCP dated 30 January 2020 for 363.19 ton
- Removing stock dated 17 December 2019 for 1,096.10 ton

Based on announcement and transaction report documents review, it concluded that all RSPO certified products submitted are in compliance with the RSPO Rules on Market Communications and Claims.

<b>Status: Comply</b>
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**PRINCIPLE #4 RESPECT COMMUNITY AND HUMAN RIGHTS AND DELIVER BENEFITS**
**4.1**

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

**4.1.1**

Company has a Sinarmas Agri Business and Food Business and Human Rights Policy that was signed by the Head of Policy and Compliance Division on December 12, 2019. The policy explains that GAR is committed to respecting human rights in all lines of operations. In implementing human rights policies and conducting responsible business, GAR is committed to, among others:

- Respect workers' rights and dignity in accordance with legal provisions, provide fair treatment without discrimination and establish harmonious industrial relations.
- Respect and protect the rights of whistleblowers and human rights defenders.
- Perform recovery measures and resolve negative impacts if there are human rights violations through a transparent and legal process.

Based on interview with worker in estate, mill, local contractor, and representative of Suhada Village, Karya Tani Village, and Lintas Utara Village, they are understand about this policy.

**4.1.2**

Based on field observation and interviews with workers and surrounding community, it is known that companies do not use mercenaries.

<b>Status: Comply</b>
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**4.2**

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

**4.2.1, 4.2.2, 4.2.3**

Company has a mechanism of complaint and grievance handling in Handling of Complaint and Grievance Procedure (SOP/SMART/SIGS-CSR/SADV/1/003) which explain handling of complaint and grievance from internal and external stakeholder. The procedure is made involve the consideration from various parties. Resolution of complaints or dissatisfaction consists of several steps of settlement, starting from the head of administration in charge of receiving complaints and dissatisfaction reports, followed by resolution at the Head Unit, RC / PC unit level. Company also will protect the identity of complainant.

Mechanisms for the protection of human rights and human rights defenders have been explained in the Sinarmas Agri Business and Food Business and Human Rights Policy. Based on interview with worker in estate and mill, it is known that workers understand how to deliver their complaint if any. Based on interview with representative of Suhada, Karya Tani, and Lintas Utara Village, it is known that they understand the mechanism to deliver their complaint if any and almost all villagers can read and write.

Company documents the incoming letter from external stakeholders in "*Formulir pencatatan keluhan dan ketidakpuasan*". Based on review of these documents, there is no complaint submit to PT BPLP whether from internal or external stakeholders for period 2018 – 2019.

#### **4.2.4**

Conflict resolution mechanisms are regulated in the prosedur No. SOP/SMART/SENS-CSR/SADV/ I/ 002 Social Conflict Management, which explains conflict handling procedures, from receiving conflict information, conflict mapping, to monitoring and evaluating the implementation of conflict resolution. The procedure also regulates the facilitation of involving third parties (mediators). The SENS (Stakeholder Engagement Section) facilitates the involvement of third parties as mediators at the request of the CEO, monitors activities carried out by third parties, facilitates communication between the mediator and management, and facilitates conflict mediation process.

As for internal complaint, based on the interviews with the Manpower and Transmigration Office of Indragiri Hilir Regency, if no bipartite agreement is reached, then complaints or conflicts can be forwarded to a third party (mediation). Until the recertification audit, there is no issue that forwarded to a third party, whether from internal or external stakeholder.

<b>Status: Comply</b>
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### **4.3**

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

#### **4.3.1**

Based on interviews with representatives of the villages of Suhada, Karya Tani, and Lintas Utara, it was found that the company cooperated with local contractors. This can increase the economic development of the local community. In addition to the use of local contractors, it is known that the company also accepts FFB from third parties other than the own estate.

Cooperation agreements exist between the company and local contractors and third-party FFB suppliers. Company showed the example of work agreement with contractor and FFB supplier, such as:

- Agreement No. 001 / BPLP / BPMM / 01/2020-CPO dated January 2, 2020 between PT Bumipalma Lestari Persada and PT Sumber Kencana Inhu as a CPO transportation contractor. The contract explains the object of work, time period, price and method of payment, tax and BPJS, etc., and signed by both parties.
- Agreement with FFB Supplier PT Agrotunggal Jayamandiri on 10 February 2020 which explain about time periode, price and method of payment, dispute resolution, etc., and signed by both parties.

<b>Status: Comply</b>
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### **4.4**

**Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their FPIC.**

#### **4.4.1**

The Company has Land Use Right (HGU) through Decree of Minister of Agraria and Chief of National Land Agency No. 73/HGU/BNP/95 dated 10 November 1995, with Certificate of HGU No. 1 dated 20 April 1996 for area 6,690 Ha. The HGU was valid until 31 December 2030. Based on information from external stakeholder and review on PT Bumipalma Lestari Persada's hectare statement of 2018 it could be concluded that there is no expansion and new planting areas. Currently PT Bumipalma Lestari Persada has managed area totaling for about 6,729.21 ha, which consist of 6,690 Ha under HGU and 39.21 Ha HGU-on process. However, scope of certification is stick on HGU area (6,690 ha).

#### **4.4.2, 4.4.3, 4.4.4, 4.4.5 & 4.4.6**

Procedure of Free, Prior, Inform and Consent (FPIC) is presented in document No. SOP/SMART/SENS-CSR/SADV/II/003 dated 1 July 2014. The procedure mentioned that FPIC shall be implemented since the beginning of estate and mill development. The

implementation of agreements negotiated through FPIC is not reviewed in consultation with affected parties, because there is no new land acquisition and legal acquisition or compensation payment had completed in 1991/1992. The documents of compensation are documented in Bahasa included maps for each land that compensated. The results of compensation documents verification and interview with communities are known that there is no indigenous rights or customary rights. It also known that compensation process is done directed to the land owner and landowners are given the freedom to release their land without coercion.

<b>Status: Comply</b>
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**4.5**

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

**4.5.1, 4.5.2, 4.5.3, 4.5.4, 4.5.5, 4.5.6, 4.5.7 & 4.5.8**

Based on documents review, interview and field visits, it is known that the Company did not expand the operational area and there is no more land clearing activity after 2005.

<b>Status: Comply</b>
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**4.6**

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

**4.6.1, 4.6.2, 4.6.3 & 4.6.4**

The Company has compiled SOP of Land Compensation, document No. SOP/SMART/SENS-CSR/SADV/I/002 dated 1 July 2014 related to identifying legal, customary or user rights, and for identifying people entitled to compensation. The procedure is described how to calculate and distribute fair and gender-equal compensation in all activities related to the compensation process for land over the land right cultivated by the Company, the purpose is to ensure the area of plantation free from others right. The Company has no new land acquisition, the entire compensation process was completed in 1992 and its documented. The results of compensation documents verification and interview with communities are known that compensation process is done directed to the land owner and given an equal opportunity to both men and women, and landowners are given the freedom to release their land without coercion.

<b>Status: Comply</b>
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**4.7**

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

**4.7.1, 4.7.2, 4.7.3**

The company has a procedure in place to identify people and/or community groups entitled to compensation presented in document No. SOP/SMART/SENS-CSR/SADV/I/003 dated 1 July 2014. The procedure is describe how to calculate and distribute fair compensation, its also mentioned that FPIC shall be implemented since the beginning of estate and mill development. The company has no new land acquisition and legal acquisition or compensation payment had completed in 1991/1992.

The results of compensation documents verification and interview with communities are known that there is no indigenous rights or customary rights. It also known that compensation process is done directed to the land owner and landowners are given the freedom to release their land without coercion. The communities that have lost access and rights to land also provided opportunities to benefit from plantation development such as plasma plantation cooperation and other benefit in the form of CSR program.

<b>Status: Comply</b>
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**4.8**

**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.**

**4.8.1, 4.8.2, 4.8.3 & 4.8.4**

The Company has established the mechanism for conflict resolution and land dispute in the procedure No. SOP/SMART/SENS-CSR/SADV/I/002 dated July 2014. Based on interview with communities and field observations, there were no land disputes and

no land has been acquired through dispossession or forced abandonment of customary and user rights prior to the current operations.

However, it was reported by estate management that there were identified disputes areas totaling for about 23.28 ha (completed with map of disputes area), which claimed by 8 persons from surrounding Villages. To overcome this situation, estate management, occupant and stakeholder from village representative (Chief of Village and Elders) has agreed a resolution which mentioned that there will be no conflict between affected parties. All agreement were signed in January 2018 and this matters has goes smoothly without any conflicts. Hence it could be concluded that land conflict could be handled through a smooth and prior to kinship process which involving representative from respective Villages.

<b>Status: Comply</b>
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## **PRINCIPLE #5 SUPPORT SMALLHOLDER INCLUSION**

### **5.1**

**The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.**

#### **5.1.1; 5.1.2; 5.1.3; 5.1.4; 5.1.5; 5.1.6**

Based on document reviews, interviews with management and previous audit results, it was recognized that there were no Plasma Farmers or Independent Farmers in the PT. BPLP. Apart from its plantations (Bumi Palama Estate, Bumi Sentosa Estate and Bumi Lestari Estate), the Company also receives FFB supplies from other parties, namely PT. Agrotunggal Jaya Mandiri and PT. Kharisma Riau Sentosa Prima which is engaged in the palm oil industry and its derivatives. There is a cooperation agreement between PT. BPLP with PT. Agrotunggal Jaya Mandiri and PT. Kharisma Riau Sentosa. PT Agrotunggal Jaya Mandiri and PT. Kharisma Riau Sentosa obtained FFB from several agents appointed as TBS collectors from farmers. Therefore, it can be concluded that PT BPLP does not directly cooperate with Farmers so that PT. BPLP does not have a cooperation contract with farmers who sell FFB to PT. Agrotunggal Jaya Mandiri and PT. Kharisma Riau Sentosa.

#### **5.1.7**

The company has calibrated electronic bridge scales for 40 tons and 20 tons capacity. This is evidenced by a certificate of examination results with number 181 / SKHP / Disdagtri-BIDKMET / XI / 2019 (for a capacity of 40 Tons), no 182 / SKHP / Disdagtri-BIDKMET / XI / 2019 (for a capacity of 20 tons), no 183 / SKHP / Disdagtri-BIDKMET / XI / 2019 (for a capacity of 20 Tons). The examination was carried out on November 13, 2019 with the results of the inspection fulfilling the requirements by affirming a valid calibration mark (SP6 = 19), validated under the law of the Republic of Indonesia No. 2 of 1981 concerning legal metrology. The certificate of inspection results has been approved by the Department of Trade and Industry of Indragiri Hilir Regency on November 14, 2019 and will be recalibrated on November 13, 2020.

#### **5.1.8 & 5.1.9**

Based on document review, interviews with management and the results of previous audits, it is known that there are no Plasma Farmers or Independent Farmers in the area of PT. BPLP. Apart from its own plantations (Bumi Palama Estate, Bumi Sentosa Estate, and Bumi Lestari Estate), the Company also receives FFB supplies from other parties, namely PT. Agrotunggal Jaya Mandiri and PT. Kharisma Riau Sentosa prima which is engaged in the palm oil industry and its derivatives. PT. Agrotunggal Jaya Mandiri and PT. Kharisma Riau Sentosa obtained FFB from several agents appointed as TBS collectors from farmers. Therefore, it can be concluded that PT BPLP does not directly cooperate with Farmers.

<b>Status: Comply</b>
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### **5.2**

**The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.**

#### **5.2.1; 5.2.2; 5.2.3; 5.2.5**

This indicator does not apply to PT. BPLP because Based on document review, interviews with management and the results of previous audits, it is known that there are no Plasma Farmers or Independent Farmers in the area of PT. BPLP. Apart from its own plantations (Bumi Palama Estate, Bumi Sentosa Estate, and Bumi Lestari Estate), the Company also receives FFB supplies from other parties, namely PT. Agrotunggal Jaya Mandiri and PT. Kharisma Riau Sentosa prima which is engaged in the palm oil industry and its derivatives. PT. Agrotunggal Jaya Mandiri and PT. Kharisma Riau Sentosa obtained FFB from several agents appointed as



TBS collectors from farmers. Therefore, it can be concluded that PT BPLP does not directly cooperate with Farmers.

#### 5.2.4

Based on document review and interviews with company management, it is known that PT BPLP does not have a plasma farmer.

<b>Status: Comply</b>
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### **PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS**

#### 6.1

#### **Any form of discrimination is prohibited.**

##### 6.1.1, 6.1.2.

Company has policy related to nondiscrimination and equal opportunity listed in GSEP which explained that Sinarmas did not discriminate against gender, race or ethnicity, disability, sexual orientation, age, or belief. Based on field observation and interview with spraying female worker, it is known that there is no issue or complain from worker regarding discrimination. Also, information from board of bipartite stated that there is no issue related discrimination. The workers that has been interviewed is came from various social origin, race, and religion. Based on interview with workers, it is known that they are aware about nondiscrimination policy. There is no migrant worker in PT BPLP.

Based on interviews with workers in estate, mill, and representatives from Lintas Utara, Suhada, and Karya Tani villages, it was found that there were no issues related to worker discrimination. Villagers can become employees in the company as needed. If there is a vacancy in the company, it will be submitted to the village representative.

##### 6.1.3

Company has a promotion and mutation mechanism in document No. KHI-SMART / 010-00 established on August 1, 2017 and approved by the Human Resource Managing Director. The mechanism explains that the promotion of workers can be divided into 2, namely the promotion of class and promotions of positions. Class promotion is divided into 2 types, namely group promotion and promotion of acceleration groups. Promotion of groups is given on the basis of the results of performance appraisal in the form of an increase in 1 sub-group.

The company shows examples of employee performance appraisal in documentation, for example as follows.

The results of the performance appraisal of the harvester with a performance appraisal period October 26, 2019 - January 26, 2020. Based on the results of the performance appraisal, issued Decree No. 003 / SK-BPME / 1 / 2020 which decided employees with NIK 20027 were promoted to PT 3.

##### 6.1.4

There is no pregnancy test. From the results of the review of employee recruitment documents, there is no pregnancy test. If at the time of recruitment it turns out that the prospective employee is pregnant, then the employee will be placed in a job not related to chemicals.

##### 6.1.5

Company has formed gender committee for handling the harassment issue around female workers. Complaint can be submitted to board of bipartite cooperation, gender committee, or their foreman. Based on interview with the board of gender committee, company provides the female worker with menstrual leave, pregnant and nursing leave for about 3 months. Pregnant and nursing female worker is prohibited to work related to chemical. And also, PT BPLP give special breast feeding time for female worker, but prohibit the worker from working with chemical material.

##### 6.1.6

Company give the equal wages for the same scope of work. For example:

- Salary slip for January 2020 of Bumi Lestari Estate worker (harvester with probation period) with ID 16001 get basic wage Rp2,682,000 and rice benefit Rp142,500
- Salary slip for January 2020 of Bumi Lestari Estate worker (harvester with probation period) with ID 10019 get basic wage Rp2,682,000 and rice benefit Rp142,500

Based on interview with worker in estate and mill, there is no complaint about wages. Basic wage is according to applicable regulation.

Status: Comply

## 6.2

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

### 6.2.1, 6.2.2, 6.2.3

The company has a collective labour agreement (CLA) that regulates the rights and obligations of workers and companies, industrial relations, wages and BPJS, working days, leave and permits, company rules, K3, provisions for layoffs. The agreement is currently in the process of being endorsed by the Ministry of Manpower based on a letter from the BKS PPS dated November 1, 2018. Until now there has been no further progress regarding the endorsement of the agreement. Based on interview with representative of worker union and worker in estate and mill, they are aware about their rights and obligation as worker, as written in CLA. CLA also has socialized to the worker and also available for worker and worker union.

In addition to the Collective Labor Agreement, the company also regulates manpower matters in an employment agreement document or SK on Appointment of employees. For example,

- Specific Time Work Agreement No. 010 / BPME / PKWT / 12/2019 between worker and the BPME Unit issued on December 25, 2019. The work agreement regulates the type of work and place of work, working days and hours, terms and conditions of employment, the period of validity of the agreement, wages, the rights and obligations of workers and companies, and this agreement has been signed by both parties and is known by the Manpower and Transmigration Office of Indragiri Hilir Regency.
- Specific Time Work Agreement No. 007 / BPLP / PKWT-BPMM / 06/2019 between workers BPMM Unit issued on 26 June 2019. The work agreement regulates the type of work and place of work, working days and hours, working terms and conditions, terms of employment agreements, wages, rights and obligations of workers and companies, and this agreement has been signed by both parties and is known by the Manpower and Transmigration Office of Indragiri Hilir Regency.
- Specific Time Work Agreement No. 007 / BPLE / PKWT / 1 / 2020 between workers BPLE Unit issued on January 2, 2020. The work agreement regulates the type of work and place of work, working days and hours, terms and conditions of work, the period of agreement, wages, rights and obligations of workers and companies, and this agreement has been signed by both parties and is known by the Manpower and Transmigration Office of Indragiri Hilir Regency.

The company has a copy of Riau Governor Decree No. Kpts.661/III/2019 concerning Riau Province's Agricultural / Plantation Minimum Wage issued on March 25, 2019. The decree explained that the sectoral minimum wage for plantations for the Riau Province in 2019 was Rp. 2,820,000. Based on interviews with the Manpower and Transmigration Office of Indragiri Hilir Regency, it is known that the Sectoral Minimum Wage of Riau Province for 2020 has not yet been published.

Following the governor's decision, the company issued Decree No. 061/CEO RIAU/HR PSM RIAU /04/2019 concerning the structure and scale of permanent workers' wages of PT BPLP Region Indragiri in 2019. The document explains the basic wages received by employees based on class and later will be added with rice natura. The lowest basic wage received by employees is Rp 2,679,500 for class PT 4 T1 and the highest basic wage received by employees is for class PT 1 A5.

Company also showed example of payment documentation that informed the detail of income and deduction, among others:

- Salary slip for January 2020 of Bumi Lestari Estate worker (harvester with probation period) with ID 16001 get basic wage Rp2,682,000 and rice benefit Rp142,500
- Salary slip for January 2020 of Bumi Lestari Estate worker (harvester with probation period) with ID 10019 get basic wage Rp2,682,000 and rice benefit Rp142,500
- Salary slip for Januari 2020 of Bumi Palma Mill Worker (Contract worker) with ID 10005, he gets basic salary Rp2,820,000.
- Salary slip for Januari 2020 of Bumi Palma Mill Worker (boilermen) with ID 97059, he gets basic salary Rp2,748,350, rice benefit Rp 142,500, and overtime payment Rp3,402,914.

Based on interview with worker in estate and mill, there is no complaint about wages. Basic wage and overtime paid is according to applicable regulation



Based on the Collective Labor Agreement, it is known that the provisions regarding working hours, working days, overtime pay, leave, and termination of employment are regulated in accordance with the provisions of Law 13 of 2003 or other applicable labor regulations. For example, based on document review of salary slip it is known that basic wage is in accordance with minimum wage, overtime payment is paid in accordance with applicable regulation. Interview with worker also informed that they get annual leave every year.

#### **6.2.4, 6.2.5**

Based on field visit to worker housing complex, it is known that the company has provided facilities and infrastructure for the welfare of employees, such as housing, water facilities, educational facilities, sports facilities, religious facilities, health facilities such as providing treatment centers and BPJS.

Based on interviews with housing complex residents, it was found that there were no complaints regarding housing facilities. If there is damage to the house, the employee can report to the employer and the company will immediately repair the damage. And also it is known that one house is occupied by one family and the condition of housing is still in good shape. Adequate food supply can be accessed by the worker from monthly market whenever payday. Moreover, there are some kiosk in housing complex. Personnel can get the staple food with reasonable price.

#### **6.2.6**

The company has calculated the applicable wages and benefits in the form of goods when calculated in rupiah. The calculation takes into account several components such as basic salary referring to the applicable minimum wage, THR, rice that is cashed, and facilities in the form of goods such as electricity, houses, water, schools, polyclinic facilities & services, and child care centers. Based on calculations that have been made, the company has given wages above the minimum wage, if benefits in the form of goods are synchronized in rupiah.

#### **6.2.7**

Based on interview with worker in estate and mill, it is known that core work is done by permanent worker. For example harvesting, manual and chemical up keep, and processing activity in mill is done by permanent worker.

<b>Status: Comply</b>
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### **6.3**

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

#### **6.3.1, 6.3.3**

The policy related to form and join worker union is written on circular letter No. 045/CEO5-SE/11/2010 which states that the company gives the right to associate to all workers. The policy is written in Bahasa Indonesia. Based on interview with representative of worker union, it is informed that company is giving freedom for worker to express their opinion. And also, company did not give any intervention related to worker union activity. Worker union has registered to Manpower Agency of Indragiri Hilir Regency with registration number 560/ Dinaskertrans-HISK/ IX/ 2018 on 16 October 2018 for Mill and No. 560/ Dinaskertrans-HISK/ X/ 2017 on 1 November 2017 for Estate worker union.

Based on interviews with representative from worker union, it is known that the company did not intervene in the activities carried out by the union. Likewise, the election of worker union officials is carried out based on consultation with all worker union members.

#### **6.3.2**

Worker union conducted internal meeting periodically or where there is an issue with company. There are minutes of the union meeting with the company on July 23, 2019 which was attended by 25 workers. The meeting discussed about PPE procurement, explained the results of the risk analysis to employees, housing improvement, and work discipline. Workers' attendance lists and activity photos are available. The documentation is available in office unit and available for member if they were asking.

<b>Status: Comply</b>
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**6.4**
**Children are not employed or exploited.**
**6.4.1, 6.4.2, 6.4.3**

Company has circular letter from HR Director No 002/SE-HRDV/03/09 about the minimum age for worker. Based on the document, the minimum age for new worker recruitment is 18 years old. Based on document review of list of worker and field observation, there are no workers under 18 years old. Based on public consultation with Manpower Agency of Indragiri Hilir Regency and field observation in estate and mill, there is no issue regarding child labor. Based on interview with worker in estate and POM, they know the minimum age to work in PT BPLP. Based on field observation in estate, auditors did not sighted any harvester accompanied by their wife or children.

Based on the review of employee documents for the period of December 2019, it is known that the youngest worker was born in 2000 and when he entered the company, the employee was over 18 years old. The worker is work as harvester

**6.4.4**

Company make a partnership with FFB supplier of third party and make an agreement with them. Based on the agreement between PT BPLP and FFB supplier, it is known that there is a clausul stating that the contractor/supplier will comply with the prohibition on child labor.

<b>Status: Comply</b>
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**6.5**
**There is no harassment or abuse in the workplace, and reproductive rights are protected.**
**6.5.1, 6.5.2**

Policy about prevention of harassment or abuse in work place is listed on circular letter No. 001/CEO5-SE/02/2009. Based on interview with female worker in Bumi Palma, Bumi Lestari, and Bumi Sentosa Estate, it is known that they understand the policy. It is also known that they understand the mechanism of complaint submission. Also, interview with committee of Gender Committee and review of "*Formulir pencatatan keluhan dan ketidakpuasan*", it is known that there is no issue or complaint related to sexual harassment on the workplace.

Other policy regarding reproductive rights for worker is listed on:

- Circular letter No.002/CEO 5-SE/03/2009 dated March 2, 2009 concerning Granting Menstrual Period Permit, states that the company provides menstrual leave for female employees for 2 days / month (first and second day) with a doctor's examination.
- Memorandum No. 001/SE/VPA5/12/08 dated 20 December 2008 concerning pregnant and lactating workers, states that the company does not allow pregnant and lactating women workers to be employed as spray power.
- Collective Labor Agreement states that:
  - Menstruation leave (H1), for female employees 2 days / month (first and second day) with a doctor's examination.
  - Maternity Leave (H2) for 3 months with details of 1.5 months before giving birth and 1.5 months after giving birth by a doctor's examination

All of these policies has socialized to worker, for example on 21 May 2019 to BPME workers and 20 February 2020 to BPLE worker. Based on interview with woman worker in estate, it is known that they know the condition of the policy.

**6.5.3**

The company has identified the presence of new mothers. It can be seen from monitoring of menstrual leave, pregnant and maternity leave, and breastfeeding data. Then, company has arrange the action to fulfill the need for new mothers and also all woman worker, for example provide a special room for breastfeeding and a work location close to the facility.

Mothers who are breastfeeding are at Bumi Sentosa and Bumi Palma Estate. Identification of nursing mothers based on monitoring H1, H2, and breastfeeding.

**6.5.4**

Company has a mechanism of complaint and grievance handling in Handling of Complaint and Grievance Procedure (SOP/SMART/SIGS-CSR/SADV/II/003) which explain handling of complaint and grievance from internal and external stakeholder. Company also will protect the identity of complainant. Based on interview with committee of Gender Committee and review of "Formulir pencatatan keluhan dan ketidakpuasan", it is known that there is no issue or complaint related to sexual harassment on the workplace.

<b>Status: Comply</b>
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**6.6**
**No forms of forced or trafficked labour are used.**
**6.6.1, 6.6.2**

Based on interviews with the company and review of employee registration documents, there are no migrant workers. All workers are from Indonesia. In addition, interviews with workers in the estates and mill, it was found that there were no forced labor cases. Workers work according to work instructions and work agreements. For overtime, employees will be asked in advance whether they are willing to work overtime.

<b>Status: Comply</b>
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**6.7**
**The unit of certification ensures that the working environment under its control is safe and without undue risk to health.**
**6.7.1**

The company already has persons that responsible for the OHS program within the organizational structure of Committee of Occupational Health and Safety (*P2K3*) established in each management unit. The organization routinely conducts monthly meetings on OHS issues in the workplace. The documentation of the meeting were recorded and stored well.

The company routinely send *P2K3* quarterly reports to the Office of Manpower and Transmigration Agency, for example, indicated by minutes of BPMM *P2K3* Quarterly IV Report on 21 January 2020 and BPME, BPLE and BSNE reported on 13 January 2020. Example of record of *P2K3* BPMM monthly regular meeting on 20 December 2019, which discusses cleaning work areas and evaluating compliance with PPE usage. Based on interviews to workers who are members of the *P2K3* organization it is known that monthly meetings are always routinely conducted to discuss about OHS such as consistency of PPE usage, work accident report, fire simulation, checking of emergency response equipment, OHS sign board, cleanliness of work area, etc.

**6.7.2**

The company provides procedures for accidents and emergencies in the SOP handling accidents and occupational diseases (SOP/SMART/HESS-EHSD-10) and SOP Preparedness and Emergency Response (SOP/ SMART/GENERAL/SADV/II/005). The procedures cover the main potential causes of emergencies such as fires, chemical spills. The procedures also explained that records of all accidents shall be kept and periodically reviewed. Since one last year, there is no occupational accidents in PT BPLP.

Simulation was performed to know the preparedness of emergency response equipment in the POM. The simulation was performed on hydrants located in the mill and the result of the experiment was concluded that the hydrant tool is ready for use. Based on interviews with operators at BPMM, it was generally concluded that they understood emergency procedures and if an emergency occurred, they knew where the muster point was

BPME, BPLE, BSNE and BPMM has already licensed first aid officers and there was first aid internal training conducted on 14 February 2020 which was attended by 45 participants. Based on field visits and interviews, it was found that all the supervisor in each of activities were equipped with first aid kit and had been trained on the use of first aid boxes and the supervisor explained the usefulness of each first aid kit.

**6.7.3**

Based on field visits and interviews with workers, the company has provided PPE and it is known that all workers received socialization about PPE every morning before go to work. PPE provided adequate and appropriate based on the results of identification of sources of hazard and risk control. All PPE can be replaced immediately if damaged. This is evidenced by shown the recording of PPE distribution documents to the workers and the workers recognition from interviews also confirmed it.

From the results of observations to rinse houses in BPME, BPLE and BSNE it is known that sanitation facilities for spray workers are available such as bathing places, changing clothes and others. Wastewater from the rinse is collected in a place that has been permanent to prevent pollution from water sources or soil bodies.

#### 6.7.4

The company has provide medical care for all workers. Medical care is covered by worker and health insurance (*BPJS*). The payment for BPJS is conducted every month according to the available rule. Besides, the company also provide medical facilities for workers if work accident is occurred. Work accident will be reported to the *BPJS* Agency and claim for it will be done if the medical process has been completed. Based on document verification, every worker has been registered to health insurance and accident insurance (*BPJS Kesehatan dan Ketenagakerjaan*). Based on interviews with workers at POM and workers in the Estates (spray workers, fertilizer workers, harvest workers), it was concluded that all of the employees were aware of medical service procedures in the event of a work accident or illness. All employees interviewed also claimed to have a *BPJS* card and if they went to the company's clinic there was no fee at all.

There are some contractors in certification unit. Based on interview with contractor representative, it is known that the accident insurance and health insurance for contractor's workers is covered by the head of contractor itself.

#### 6.7.5

The company has calculated the Lost Time Accident every month for monitoring the recording of occupational accidents. It shown the Lost Time Accident calculation per January 2020. This document informs the number of worker, number of working days, the number of non effective working days, overtime, hours of work in total, the number of accidents, the number of working days lost, hours of work a year, the number of accidents a year, lost days a year. Calculation of SR and FR is reviewed regularly and will be evaluated at monthly meeting of OHS Committee.

<b>Status: Comply</b>
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### **PRINCIPLE #7 PROTECT, CONSERVE AND ENHANCE ECOSYSTEMS AND THE ENVIRONMENT**

#### 7.1

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

##### 7.1.1

The activity budgeted on the program were consist of detection, census and monitoring of pests and diseases attack, biological control such as barn owl nest installation and planting of beneficial plants. According to IPM activity records for January to December 2019 such as program and realization of rat census, leaf eating caterpillar census, and termite census, it could be concluded that all the census results were still under its economic threshold. There is no invasive species attack. This may lead to zero use of pesticides for pests and diseases control. It could be concluded that IPM techniques implemented by biological methods is effective to control pests and diseases, and also to minimize the use of chemicals. Furthermore, according to pesticides used record in 2019, agrochemical uses was only implemented for weeds control purposes.

The company has a good commitment to improve the use of pest natural predator as part of integrated pest control. One of natural predator development is the reproduction and the construction of barn owl box as a mechanism to control rat. It monitoring barn owl box occupation at least once a month. The monitored parameter are the existing of barn owl in the boxes, left food, and sign of reproduction such as egg or owl. Currently, there are total 214 barn owl boxes in PT BPLP and inhabited 201 barn owl boxes. The company also controls leaf eating caterpillar by planting and maintaining host plant of leaf eating caterpillar natural enemies such as *Turnera subulata*. Based on field observations, it is seen that along the main canal and collecting canal, *Turnera subulata* plants are indeed well developed

The company has records of the training implementation for workers who are involved in the implementation of integrated pest management, for example, Integrated Pest Management training on 27 November 2019 with the number of participants are 36 employees consisting of census operators, supervisors, and field assistants. Based on interview with the worker revealed that the worker understand the method of plant pest and diseases census or detection.

**7.1.2**

Based on document review and interviews with relevant management, it is known that the company does not use the species mentioned in the Global Invasive Species Database and CABl.org in integrated pest control.

**7.1.3**

Based on the study of pest control documents, pest control procedures owned by the company, as well as interviews with related management, it is known that the company does not use fire in controlling pests.

<b>Status: Comply</b>
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**7.2**

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

**7.2.1**

The company has SOP and work instruction on weeds management, the guidance covering about chosen, storage, application, contaminated handling, known about signs and symptoms of pesticides poison and first aid for poison case. To ensure pesticide used are in accordance with the target, company conducted identification the type of weed found in operational area.

Based on field visits and interviews with pesticide applicators in BPME BSNE and BPLE, it was concluded that workers knew about the function of the chemical used and selective when doing the spraying activity, as for example for glyphosate material used to spray the circle and harvesting path only while the weeds in inter row not sprayed. The company used *Isopropil amina glyphosate* and *Metil metsulfuron* which have received permission from the government. Based on document verification and observation to pesticide storage, there is no prohibited chemicals use.

**7.2.2**

The company has documented records of pesticide toxicity in the document of Monthly Pesticide Toxicity Data. The document is recorded product name, active ingredients, LD<sub>50</sub>, area treated, amount of active ingredients applied per Ha, and total application. This document is constantly recorded and updated by Estate Sustainability Officer each month.

**7.2.3**

PT BPLP has program to reduce the pesticide usage by replacing pesticides with biological controls such as using natural predators to control rat and planting the beneficial plant. Based on document review and field observation, several IPM program with biological approach that has been implemented such as rat control by *Tyto alba*, and leaf eater caterpillar by planting beneficial plant such as *Turnera subulata* and *Casia cobanensis*. Moreover, it has also conducted early detection routinely listed in the monthly report of early warning system. Based on document review, there is no prophylactic use because during 2019 the company does not use pesticide for pest control at all.

**7.2.4**

There is no prophylactic method in the use of pesticides by companies. The company only controls using pesticides if the pest attack census shows results above the threshold. However, based on pesticide use data for the past 1 year, it is known that the use of pesticides is only intended to control weeds, there is no use of pesticides in pest control.

**7.2.5**

On the August 2015, President Director of SMART Tbk issued a memorandum not to use paraquat in 2016. Regarding to *Pesticides that are categorized as WHO Class 1A or 1B, there is Social and Environment Policy that stated* minimized and eliminated as part of a plan, and shall only be used in exceptional circumstances. Based on document verification and field visit to pesticide storage, there is no paraquat and WHO Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions application from January 2019 until January 2020.

**7.2.6**

The results of field observation in warehouse and interview with pesticide applicator in BPME, BPLE and BSNE, it is known that the employees have been given regular training in safe work practices. This was evidenced by the employee can demonstrate the correct way to work in accordance with the procedures including how use and handling the risks in accordance with material safety sheets. There have been sheets of safety work (MSDS) and the symbols of hazardous and toxic materials are properly installed on the walls and doors of warehouse. The pesticide applicator also using personal protective equipment in accordance with specified

hazard identification and material safety data sheet such as respirator mask, gloves, safety shoes, apron and goggles.

In addition, employees are also informed about the steps of secure work in each roll call in the morning before work. Meanwhile, the spraying workers interviewed also claimed that after spraying they will be washing up and drying up the PPE and spraying tools (sprayer tank, jerry, etc), and taking shower/changing clothes in special place near pesticide store of the division office. Therefore, based on field observation to rinse house in BPME, BPLE and BSNE, that known there are storage for keeping all PPE's and spraying tools after use.

#### **7.2.7**

The company has a material and chemical management procedure (SOP / SMART / LEMS-EHSD / SADV / I / 006) which explains the inspection of materials and characteristics including hazardous chemicals. Officers who control are warehouse officers. Officers periodically monitor the condition of stored materials to find out damage and expiration.

Based on the results of field visits in the pesticide (chemical) storage warehouse at Bumi Lestari Estate, Bumi Sentosa Estate and Bumi Palma Estate it is known that the storage of all pesticides is in accordance with the procedure and does not mix with other materials.

#### **7.2.8**

The company already has an SOP for handling pesticide waste, namely:

- SOP for Washing and cleaning Agrochemical Packaging with No. SOP: SOP / SMART / LEMS-EHSD / SADV / I / 002 was approved by the Head of Upstream on July 1, 2014. The pesticide packaging was washed 3 times (according to MSDS) and used washing water was used for the spraying process. Washing refers to IK No. IK / SMART / LEMS-EHSD / SADV / 002/001 and Form No. F / SMART / LEMS-EHSD / SADV / 002/001.
- Waste Management SOP No. The SOP / SPO / SMART / LH-09 document on July 1, 2010 in point 6.3.b explained that the packaging of the pesticides that had been washed was returned to the Supplier. Stages of Washing and Cleaning of ex-Pesticides and Fertilizer Bags in accordance with the instructions of the office: collect all used containers, use PPE and do 3 rinses.
- Material management and transfer SPO (SOP / SMART / LEMS-EHSD / SADV / I / 006) which explains the examination of materials and characteristics including hazardous chemicals. The control officer is the warehouse officer, the head of the warehouse has the right to reject chemicals that have been damaged and expired. The officer periodically monitors the condition of the stored material to find out the damage as well as the levels. If it is known that there are materials and chemicals discharged to the toxic and hazardous waste place, to the final disposal site, or returned to the supplier.
- Circular No. 01 / RC - BPLP / Reg. Indragiri Hilir / February / 2016 issued on February 3, 2016 by RC Regional Indragiri. The SE explained that, all B3 waste produced by the plantation (BPME, BSNE and BPLE) could be temporarily stored in the toxic and hazardous waste, a maximum of 3 months (90 days).
- Toxic and hazardous waste management in the form of pesticide packaging based on work instructions for handling the packaging of agrochemicals and chemicals (IK / SMART / LEMS-EHSD / SADV / 002/001) which was approved on July 1, 2014. The work instructions explain that all packaging pesticide traces collected and recorded. Rinse the package with clean water, then flush the rinse in a shelter to the sedimentation tank. Rinse water can also be used as a pesticide diluent. Used containers can be reused for the same activities and / or returned to the supplier and / or handed over to toxic and hazardous waste storage officers.

Based on the results of a field visit to the Agrochemical warehouse at Bumi Palma Estate, Bumi Lestari Estate and Bumi Sentosa Estate it is known that pesticides have been stored in accordance with best practices and storage of pesticides in accordance with their types. Based on the result of visits to Bumi Palma Estate, Bumi Sentosa Estate and Bumi Lestari Estate housing areas, there were no use of pesticides packaging used by employees, such as water storage or domestic waste.

#### **7.2.9**

The results of the document review, interviews with management and employees, and field observations revealed that the company did not apply pesticides by air.

#### **7.2.10**

PT BPLP has list of pesticide operator based on latest data of February 2019 as many as 24 workers in BPME, 11 workers in BPLE



and 15 workers in BSNE. Medical examination (cholinesterase) has been conducted on 29-31 October 2019 to all pesticides workers. The result of medical examination is informed to the workers and all pesticide operators are in a healthy condition (normal result). And also, based on interview with the workers, it is known that they are never get experience of occupational injury which caused by chemical such as irritation.

### 7.2.11

The company has a policy that prohibits pregnant and breast-feeding personnel working with chemical material. Based on interview with spraying personnel, it is known that there was neither pregnant nor breast-feeding female personnel who work with pesticide because all the pesticide applicators was male. Audit team also got information that the personnel have understood that female personnel cannot work with chemical material if they are pregnant or breastfeeding.

<b>Status: Comply</b>
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## 7.3

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

### 7.3.1 & 7.3.2

The company has a waste management SOP number SOP/SMART/LEMS-EHSD/SADV/I/002 dated 2 July 2014. This SOP explains the waste management program implemented at Sinarmas plantation, namely: waste management is carried out with the internal provisions of Sinarmas plantations by implementing Reduce, Reuse and Recycle (3R). Zero burning and hoarding principles. The company already has documentation and identification of all waste products and their sources in the 2019 Environmental Aspect Identification List document. Type of waste been identified for examples are :

- Estates, waste source : chemist activities, waste type : ex pesticides containers (toxic and hazardous waste)
- Mill, waste source : FFB process, waste type : shell and fiber (non toxic/hazardous waste)
- Estates, waste source : pruning activities, waste type : oil palm fornd (organic waste).

For the management of Toxic and hazardous waste, the company carries out temporary storage in a temporary storage are. The company has a Toxic and Hazardous waste storage permit based on the decision of the Head of the Investment Agency and one-stop integrated service in Indragiri Hilir District number 503/DPMPTSP-IPSL.B3/4 dated October 20, 2017 which is valid for 5 years. Temporary Storage toxic and hazardous waste is located at coordinates 102°59'0.54"BT and 0°35'51.99 " LS. Based on field observation in hazardous waste storage, the waste is placed accordance with its license.

The company shows a letter of cooperation agreement between PT BPLP with PT. Primanru Jaya with No. 164/EPMD/SPK-Pengelolaan LB3/BPLP-PJ/IX/2019 on September 23, 2019 valid for 3 years. This agreement contains cooperation for the collection, cleaning, handling and transportof toxic and hazardous waste. The waste is collected by the transporter of hazardous waste (PT Primanru Jaya). Document of hazardous waste transporting is in form of official report of handover and manifest. The latest handover of hazardous waste was on 18th Februari 2020, among others:

- BC 0054746 for TL Lamps as much as 0,0015 ton
- BC 0054776 for used oil as much as 745 liters
- BC 0054779 for contaminated used packaging as much as 0,755 ton
- BC 0054778 for used rag as much as 0,025 ton
- BC 0054777 for used filters as much as 0,275 ton
- BC 0054749 for medical waste as much as 5 Kg.

Based on field observation in housing complex in BPME and BPLE, there is no hazardous waste that is reused. The in and out wastes is recorded in hazardous waste balance sheet that updated every month. Based on interview with worker in chemical storage in BPME and BPLE, ex-chemical container is re-used for pesticide mixing, other than that everything is collected at hazardous waste warehouse.

Domestic solid waste in the form of household and office waste which is divided into organic and inorganic in residential locations, offices, workshops and clinics. Organic waste in the form of leaves, food scraps and others are thrown and piled in the waste bins



or managed by making organic fertilizer / compost. Inorganic waste is collected in the garbage bin / container that has been provided for later transported to the final landfill in the area to be stockpiled, or managed with the principle of Reduce, Reuse and Recycle.

The company has promoted waste management to workers at Bumi Palma Estate, Bumi Sentosa Estate and Bumi Lestari Estate, such as:

- Socialization of waste management, MSDS, symbol of danger and Toxic and hazardous waste on October 22, 2019 which was conducted at morning apple to 89 employees of Bumi Palma Estate.
- Socialization of waste management, MSDS, symbol of danger and Toxic and hazardous waste on October 19, 2019 which was conducted at morning apple to 41 employees of Bumi Sentosa Estate.
- Socialization of waste management, MSDS, symbol of danger and Toxic and hazardous waste on October 29, 2019 which was conducted at morning apple to 68 employees of Bumi Lestari Estate.

### 7.3.3

The company did not burn to dispose of waste, this is evidenced by the results of field visits at Bumi Palma Estate, Bumi Sentosa Estate and Bumi Lestari Estate. Domestic waste is collected in the bins provided by the company which consists of organic and anorganic waste and then transported to the final waste collection site in the area for landfill. For toxic and hazardous waste collected in a temporary storage area which will then be handed over to the authorized transporter for further management.

<b>Status: Comply</b>
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## 7.4

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

### 7.4.1

The company has SOP of Manuring (SOP/SMART/MCAR/IX/TA-PPK) to maintain soil fertility. The SOP approved by SMD Ops on 12 June 2012. The company has conducted soil sampling units and leaf sampling units (SSU/LSU), manuring activities, bunch ash applications, and ground cover maintenance in accordance to maintain soil fertility.

BPME, BSNE and BPLE can show documents on the realization of anorganic fertilization for 2019. The auditor conducted an interview with the fertilizer workers at BPME. Fertilization is done manually by sowing. Workers can also explain the fertilization procedure well, which is in accordance with the dosage determined based on the recommendations.

### 7.4.2

The company has routinely monitored the changes on the nutrient status based on the regular soil sampling unit (SSU) and leaf sampling unit analysis (LSU) to determine fertilizers recommendation. The sampling spot has been determined in each division and block routinely by SMART Research Institute (SMARTRI) and it is supported by well-trained census Officer in each estate. SSU is conducted every 5 year for trees with age of 3, 8, 18 and 23, meanwhile LSU is conducted annually. The last LSU result was issued on March to April 2019 and the last SSU result was issued on June 2019. Visual observations performed every year at the time of leaf analysis activities. Visual observation is a consideration in determining the fertilizer recommendations, deficiency of nutrients and analyze the potential of disease which is likely to become endemic of a particular disease.

Result of soil and leaf analysis published recommendation on fertilizer doses to produce an optimal production of palm fruit. Principles of fertilization are giving treatment on the ground to produce the nutrients required by palm and generating optimal results.

### 7.4.3

PT Bumipalma Lestari Persada is a plantation located on peat soils with very high organic matter content. Therefore, companies do not need to apply fertilizers with high organic content such as EFB and POME. The only organic fertilizer used by the company is only the bunch ash. The pattern of applying bunch ash is the same as the application of inorganic fertilizer, which is sown around the dish. BPME has applied 582.73 tons in 2019.

### 7.4.4

The company shows the results of fertilizer recommendations in 2019. The types of fertilizers used are Urea, Super Dolomite, Kaptan, Kieserite, RP, TSP, MOP, Borate, ZnSO<sub>4</sub> and CuSO<sub>4</sub>. The verification of fertilization activities documents for the period until December 2019 in each estate were in accordance with the recommended dosage. Fertilization activity records are recorded well by the company that explains the type of fertilizer, the number of workers, work performance, and the dosage used. For example in the BPME for urea fertilizer has a program in 2019 totaling 1,025.22 tons and as of December 2019 it has been realized 1,025.22 tons and in the BPLE for urea fertilizer has a program in 2019 totaling 551.95 tons and as of December 2019 it has been realized 551.95 tons; in the BSNE, for urea fertilizer has a program in 2019 totaling 298.85 tons and as of December 2019 it has been realized 298.57 tons.

From the verification results of the realization of the fertilizer application documents for BPLE, BPME and BSNE, it was concluded that the fertilization realization was appropriate and for the 1 year program had been completed by the company based on the fertilizer recommendations set.

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

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

#### 7.5.1; 7.5.2 and 7.5.3

The company has maps that identify marginal and fragile areas, topographic maps that explain land slopes and maps of peat areas. The map is used to identify areas that are not suitable for planting. Based on general field observations, it is known that the area in PT BPLP is entirely flat. There is no steep area planted with palm oil. At the time of the audit activity, there were no new planting activities in the area of the company's management.

<b>Status: Comply</b>
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## 7.6

### 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.

#### 7.6.1; 7.6.2; and 7.6.3

The company has maps that identify marginal and fragile areas, topographic maps that explain land slopes and maps of peat areas. The map is used to identify areas that are not suitable for planting. Based on general field observations, it is known that the area in PT BPLP is entirely flat. There is no steep area planted with palm oil. At the time of the audit activity, there were no new planting activities in the area of the company's management.

The company can show topographic maps and land surveys in the management of planting areas. This information has been used by the company in the development of oil palm plantations which are now underway such as the establishment of road, bridge, water gate, trench and other infrastructure.

<b>Status: Comply</b>
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## 7.7

### No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.

#### 7.7.1

The entire area of PT BPLP is a peat area with a depth of under 3 meters with a total area of 6,690 Ha. From the statement area data shown it is known that PT BPLP's oil palm plant has entered the second cycle. No new plantings were carried out on peatlands after 15 November 2018.

#### 7.7.2

The company has reported the existing peat areas within the managed area to RSPO on 15 November 2019 via email with the aim of the GHG Unit (ghg@rspo.org). Available proof of screen capture of sending the email. In that report the peat area in PT BPLP was reported as 6,690 Ha.

#### 7.7.3

The company has a subsidence monitoring standard of 38 compliance points with details: BPLE 15 compliance points; BPME 15

compliance points; and BSNE 8 compliance points. The company shows the results of monitoring subsidized stakes from January 2018 to December 2019. Monitoring of subsidized stakes is conducted every 1 month. From the results of this monitoring, various results were obtained. For example in block E05 BPME from January 2018 to December 2019 there was a decrease in land surface of 0.9 cm. In general, the results of monitoring subsidence stakes concluded that there was no significant land subsidence, moreover there were also measurement results showing that the surface of the land in the area of PT BPLP had increased. This is because the water condition is very well maintained and the company also has a good water management system because all transportation of FFB is done through water canals.

The results of the field observations in the F09 block of BPME and in the L09 block of BPME, it is known that the company has installed subsidence stakes and is in a well maintained condition.

#### **7.7.4 and 7.7.6**

Based on the piezometer compliance point map shown, there are a total of 56 piezometer compliance points in the operational scope of PT BPLP. The company can show water level and piezometer monitoring documents for the period January to December 2019 which are carried out routinely every week at all compliance points. The results of monitoring water levels vary from week to week. For example in the third week of December 2019 showed an average water level of 62.75 cm from the ground surface and in the fourth week of December 2019 showed an average water level of 40.47 cm from the ground surface. The company has a water management system using a water gate to be able to always maintain the water level in the range of 60-80 cm from the ground. The company also conducts routine daily rainfall monitoring as supporting data in the water management system in the peat area.

From the results of field observations in block F09 BPME, the water level at the point of compliance was 27.8 cm from the ground surface and in block L09 BPME the water level was 57 cm from the ground surface. Based on field observations in PT BPLP's peat areas in general, there are ground cover crops such as legumes and nephrolepis in the field.

#### **7.7.5**

The company shows the results of the assessment of the drainability assessment of oil palm plantations of PT Bumipalma Lestari Persada conducted in 2018 using an alternative methodology (not based on the RSPO Drainability Assessment Procedure). Based on the results of the study conducted, it can be concluded several points, namely:

- The drainability assessment activity at PT BPLP is done by approaching condition analysis of peat characteristic and drainage / hydrological condition with study area boundary of HGU BPLP Area
- The drainability assessment in PT BPLP is done by approaching rainfall data analysis, distribution and channel dimension, river network, ground water level and zonation of water governance. For water management zonation in PT BPLP is divided into 5 zones. Available zonation maps of water governance and flow direction of PT BPLP.
- Projected future peatland drainage conditions related to the viability of oil palm plantation activities in PT BPLP are conducted with an analysis Drainage Limit Time (DLT) approach each zonation. Referring to the analysis result, it is known that from every zone 1 of 176.47 year zone 2 is 137.61 years, zone 3 is 468.75 year, zone 4 is 468.75 year and zone 5 is 468.75 year. Then the area can still be used for production activities (in the case of replanting)

The main drainage problems that occur in PT BPLP are the water supply (water supply), the loss of water (water loss) and overcapacity or flood. Water resources management and drainage problem solutions are carried out by (1) operational water management and (2) drainage problem solution (through channel maintenance and infrastructure development for water management).

#### **7.7.7**

Based on PT BPLP's hectares of statements shown, from the entire area of the company's management, it is known that the planting area is entirely in the peat area. There is an area not planted with oil palm plants consisting of canals, roads, buildings, factories, air strips, and enclave areas. There is no peatland reserves and only a 0.5 Ha HCV area in the form of graves that is outside the scope of this RSPO certification.

<b>Status: Comply</b>	
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**7.8**
**Practices maintain the quality and availability of surface and groundwater**
**7.8.1**

Sources of water that have been identified through SEL and HCV studies are swamp surface water that has been drained in canals in the plantation area. In addition to swamp surface water, no other water sources are identified either in the form of natural rivers or ground water (springs). However, the plantations have established a surface water management program to ensure the availability and quality of water in peat swamps (canals), including testing surface water quality, measuring surface water level canals, washing canals, planting fertifer grass. Meanwhile for factories utilizing surface water in accordance with permits stipulated by the regional government, water usage does not exceed established standards, records the water debit used, reports surface water utilization to relevant agencies and pays water usage fees.

The results of field observations note that the location information boards / sampling points for channel surface water quality are available, available high-level water level canals with results in accordance with applicable regulations (60 to 80 cm), planting vertifer grass on the left and right edges well-developed canal. While field observations at PKS are known that the water discharge meter is functioning properly, the recording of water discharge is carried out by field officers. In addition to drinking water facilities, the company has provided drinking water facilities in the form of RO (Reverse Osmosis) located at the factory. Each cottage from each estate will get drinking water in the RO every week and distributed to each worker. Based on information from the worker's family, workers will get 2 gallons every week for drinking water.

**7.8.2**

Based on the soil survey semi detailed soil survey conducted by the Plantation Planning and Supervision Division (PMNP) in 2007 with a scale of 1: 25,000, as well as field observations, it can be concluded that the slope class in PT BPLP's operational area is flat (0-3%). Then based on the results of a conservation area study in February 2013, it was informed that there were no lakes, springs and rivers that passed the company's operational area.

**7.8.3**

CH has the permit of dispose of liquid waste into water bodies based on the decision of the investment service and integrated service of Indragiri Hilir District on October 20, 2017 number 503 / DPMPTSP-IPAL / 08 which is valid for 5 years. Observation in WWTP and mill effluent discharge point and interview with environmental agency indicates there is no environmental pollution caused by POME discharging activities. The waste water quality testing conducted by acreditation laboratory. The quality standard used is the Decree of LH No. 5 of 2014. Parameters tested include: BOD, COD, pH, Oil, and N. the results of testing the quality of wastewater for the period June – December 2019 showed no parameters that exceeded the quality standard.

**7.8.4**

The Company that have a Surface Water Retrieval Permit from the One-Stop Integrated Investment and Service Office of the Government of Indragiri Hilir Regency with no: 503 / DPMPTSP-SIPAP / 04 dated September 13, 2018, used for 2 years. Bumipalma Lestari Persada Canal in Bagan Jaya Village, Enok District, Indragiri Hilir Regency with coordinates 00 00 '914 "and BT 102 59' 038". The volume of water uptake is 350 m3 / day with a production duration of 10 hours per day. The average water use for processing in the January - December 2019 period is 1,290 M3 / ton FFB. All the evidence provided and field visit lead the auditor to conclude that the company has had well water management program and has been implemented with periodic monitoring.

<b>Status: Comply</b>
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**7.9**
**Efficiency of fossil fuel use and the use of renewable energy is optimised.**
**7.9.1**

The plan to increase the efficiency of the use of fossil fuels is carried out by substituting the use of renewable energy, namely shell and fiber as boiler fuel. The company has routine monitoring of the use of fossil fuels, and renewable energy such as shells and fibers as well as evaluating the efficiency of energy use. During the period of January-December 2019, the use of shells and fibers for boiler purposes resulted in an efficient use of energy of 26,920 kwh / Kg of FFB, efficient use of fossil fuels of 9.56 liters / ton of FFB.

**Status: Comply**
**7.10**
**Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.**
**7.10.1**

CH also has conducted GHG emission calculations period 2019 use of Calculator Palm GHG version 4.0. Accurate data has been input to the RSPO Palm GHG Calculator (Palm GHG version 4.0) and has been verified. Summary of net GHG emissions from Palm GHG calculator of the audit report which calculation option is applied "Apply full Version".

**Summary Emission:**

<b>Emission per product</b>	<b>tCO<sub>2</sub>e/tProduct</b>
CPO	52.42
PK	52.42

<b>Extraction</b>	<b>%</b>
OER	21.23
KER	5.17

<b>Land use</b>	<b>Ha</b>
Planted area on mineral soil	6100.50
Planted on peat	6082.56
Total oil palm planted area	12183.05
Conservation Area (Forested)	0
Conservation Area (Non Forested)	0
FFb Production per hectare	28.33 t/ha

**Estate/Plantation field emission and Sinks**

<b>Description</b>	<b>Own</b>		<b>Group</b>		<b>3<sup>rd</sup> Party</b>		<b>Total</b>
<b>Emissions Sources</b>	<b>tCO<sub>2</sub>e</b>	<b>tCO<sub>2</sub>e/ tFFB</b>	<b>tCO<sub>2</sub>e</b>	<b>tCO<sub>2</sub>e/ tFFB</b>	<b>tCO<sub>2</sub>e</b>	<b>tCO<sub>2</sub>e/ tFFB</b>	
Land conversion	60075.09	0.69	7905.59	0.26	0.00	0.00	67980.68
CO <sub>2</sub> emissions from fertilizer	11814.97	0.14	508.90	0.02	0.00	0.00	12323.87
N <sub>2</sub> O emissions from peat	45532.51	0.52	0.00	0.00	0.00	0.00	45532.51
N <sub>2</sub> O from Fertilizer	7150.02	0.08	398.97	0.01	0.00	0.00	7548.98
Fuel consumption	1469.08	0.02	152.56	0.01	0.00	0.00	1621.63
Peat oxidation	332107.23	3.80	0.00	0.00	0.00	0.00	332107.23
<b>Sinks</b>							
Crop sequestration	-56943.23	-0.55	-7493.45	-0.25	0.00	0.00	-64436.68
Sequestration in Conservation area	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>401205.66</b>	<b>4.59</b>	<b>1472.56</b>	<b>0.05</b>	<b>1864278.31</b>	<b>0.00</b>	<b>2266956.54</b>

**Mill Emissions and Credits**

<b>Description</b>	<b>tCO<sub>2</sub></b>	<b>tCO<sub>2</sub>e/t FFB</b>
<b>Emissionssources</b>		
POME	396.05	0.00
Fuel consumption	742.27	0.00
Grid electricity	0.00	0.00
<b>Credits</b>		
Export of grid electricity	0.00	0.00
Sales of PKS	0.00	0.00

Sales of EFB	0.00	0.00
Total	1138.32	0.01

**Emissions from Palm Kernel Crusher**

Emission Source	tCO <sub>2</sub> e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumption	0.00
Total Crusher Emissions	0.00

**7.10.2**

There has been no new development since 2014 in the area of PT. Bumi Palma Lestari Persada

**7.10.3**

To reduce pollution and emission, the company has identified the pollution sources and emissions and the management steps which are described in SOP of GHG Mitigation. In addition, company also identified GHG sources included management plan for reducing it. Monitoring for emission and pollutants (air emission, air ambient, odor, noise, and vibration) from estate and mill was done periodically every semester, covered on RKL/RPL implementation report and reported to environmental agency periodically. 2nd Semester 2019 testing result indicates all parameters related to emission are still comply with standard quality.

All waste including emissions and pollutions sources from Mill and estate are identified and recorded on waste and pollution identification risk 2019 document. Fossil fuel reducing have been implemented by fiber and shell usage. Realization of renewable energy have been monitored on monthly report for fiber and shell usage. Waste water has been monitored every months and monitoring periods July - December 2019 sighted that all of waste water testing parameters is compliant to the standards quality. Based on field visits in the boiler station any a fiber and shell is used as fuel. Remaining fiber shell and placed so did not result in pollution and potential fire. Base on field visit in landfill, Bumi Lestari Estate, Bumi Palma Estate and Bumi Sentosa Estate is known there are not ex pesticide containers disposed in landfills and be divided organic and an anorganic trash.

**Status: Comply**

**7.11**
**Fire is not used for preparing land and is prevented in the managed area.**
**7.11.1**

Based on field observation in BPME, BPLE, BSNE, there is no burning activities in estate. The CH has policy about prohibition of burning activities in estate. Besides, there is no new land clearing activities based on document and field observation. Also, the procedure of land preparation mentioned that zero burning method are used for preparing land. Based on field observation in estate, sighted the signboard for zero burning activities.

**7.11.2 & 7.11.3**

The company has carried out fire prevention and control. For prevention activities the company isolates the garden area by making canals. Furthermore, routine supervision is carried out by plant maintenance employees to conduct surveillance throughout the entire garden area. Provision of APAR and fire extinguisher is carried out in all estate offices and also in all division offices for fire emergency response.

The company also carries out monitoring activities on PT. BPLP is conducted every month. In 2019, based on the report of land fire vulnerability monitoring in semester 2 of 2019 (July-December), there were no fires in the area of PT. BPLP. Monitoring activities are carried out throughout the company's plantations. Based on fire simulation results and fire fighting equipment preparedness at Bumi Palma Estate, Bumi Lestari Estate and Bumi Sentosa Estate it is known that the water pumping machine at Bumi Palma Estate is not functioning properly while at Bumi Lestari Estate and Bumi Sentosa Estate the pumping machine is functioning properly. Then the company firefighters can carry out their duties and responsibilities properly and can explain related to fire-fighting procedures and emergency response owned by the company. The auditor team concluded that the company ensures monitoring of fire engine pumping equipment. **(OFI)**.



The company has conducted socialization and simulation on fire fighting to employees and the community around the plantation. The socialization activity was carried out on April 14, 2019 and was attended by 81 participants consisting of workers and the community around the plantation. The purpose of this activity is to make an introduction to existing fire equipment and how to use it and provide understanding to employees and the community of fire hazards and understand the flow or reporting procedures so that fires or other disasters are responded to immediately.

Status: Comply

## 7.12

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

### 7.12.1 & 7.12.2

There has been no new development since 2014 in the area of PT. BPLP. Certificate holder has conduct HCV assessment which carried out by Biodiversity and Conservation Sustainability Division (RSPO approval HCV accessor) in 2012, presented in HCV report of HCV Identification PT BPLP dated February 2013. Peer review of the report had carried out in May 8<sup>th</sup> 2013 by Dr. Nyoto Santoso while public consultation had carried out in may 11<sup>th</sup> 2013 in, attended by 40 stakeholders. Based on HCV identification there were identified two HCV attributes, i.e. HCV 1.2 on protected species and HCV 6. Based on HCV 1.2 identification, it was informed that there were no RTE species, but there were 9 species with category protected by PP No.7 / 1999, 8 species with category CITES appendix II, and one species identified on the IUCN redlist with Vulnerable status. Furthermore, HCV 6 has Identified in Block H09/H10 Div. 2 Bumi Palma Estate as local cemetery covered 0.50 ha areas and has been mapped in 1:50,000 scales.

### 7.12.3

The Indonesian Sumatra region is further in Riau province, excluding the HFCL region.

### 7.12.4

Based on the review of HCV identification documents, interviews with workers and related agencies during the audit and field visits, there are no species in the operational area of PT BPLP that are categorized based on RTE status. However, the Company has a plan for the HCV 2019 program as follows: wildlife monitoring, HCV outreach to workers / communities, routine patrols for HCV areas, fire-prone areas patrols, HCV signboard maintenance, and erosion resistant plant maintenance. HCV monitoring including fauna and flora is carried out every month, flora and fauna monitoring also refers to PP 7/1999. Monitoring of flora and fauna found in 2019 there were 9 species of Aves and 1 type of mammal that was identified in the latest monitoring. Reporting to relevant agencies is done through environmental management and monitoring of semester reports.

Routine patrols within the plantation area are underway and findings are recorded by the respective plantations, monitoring and controlling illegal hunting / fishing / collecting activities. Signs that prohibit hunting / fishing / water pollution activities are verified on site. Based on interviews with chemical applicators it was stated that they already knew of company policies related to HCV management.

The CH policy issued on 25 June 2012 illustrates the company's commitment to protect and prohibit illegal hunting / fishing / RTE species collection. Dissemination to workers and the surrounding community is carried out routinely, for example on March 21, 2019 at Bumi Palma Estate (86 workers) and August 6, 2019. Interviews with management representatives stated that inspections were carried out routinely to workers line locations and HCV areas to ensure that mitigation had been implemented. There were no violations committed by workers such as capturing and collecting RTE species during field observations.

### 7.12.5

Interviews with the local community revealed that the existence of HCV 6 in the H10 Bumi Palma Estates block did not overlap with the rights of the local community. The team of auditors found that the burial area was not planted with oil palm trees and the places were correctly marked.

### 7.12.6

The CH policy issued on 25 June 2012 illustrates the company's commitment to protect and prohibit illegal hunting / capture / collection of RTE species. The policy also explains strict disciplinary sanctions on company employees who carry out hunting, maintaining and injuring the lives of rare and endangered wildlife. There is a company program to educate workers on a regular

basis to understand the HCV area and protected animals / flora, namely the socialization of HCV to employees. Dissemination to workers and the surrounding community is carried out routinely, for example on March 21, 2019 at Bumi Palma Estate (86 workers) and August 6, 2019. Interviews with management representatives stated that inspections were carried out routinely to workers line locations and HCV areas to ensure that mitigation had been implemented. There were no violations committed by workers such as capturing and collecting RTE species during field observations.

#### **7.12.7**

The HCV management plan is reviewed regularly every year by involving stakeholders (surrounding communities and NGOs) and experts that have been carried out in 2019. From the results of the review there are recommendations for improving HCV management activities in the future, namely:

- Improve the quality of HCV management and monitoring activities in accordance with the SOPs that are available.
- Complete lack of socialization documents as a complete part of the documentation of an activity, especially invitations as evidence of the activities and equipment of the report file.
- Equip equipment needed for the management and monitoring of HCV areas.
- Perform faded HCV signboard maintenance.

From the results of these recommendations the company has prepared and established a HCV management plan for 2020, namely:

- Maintenance of HCV signboard every 3 months.
- Maintenance of erosion resistant plants every month.
- Monthly wildlife monitoring.
- HCV socialization to employees and the community every year
- Patrol fire-prone areas every month.
- HCV patrol every month.

#### **7.12.8**

This indicator does not apply to PT. BPLP because there is no new land clearing by the company.

<b>Status: Comply</b>
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**3.2 Conformity Checklist of Certificate and Trademark Use**

<b>1.</b>	<b>Evidence of permission or approval certificate and logo from Certification Body which submitted by Client</b>	<b>X or√</b>
<b>ASA 1.1</b>	PT SMART Tbk (Parent Company: Golden Agri Resources Ltd) Trademark License Number RSPO-1-0096-11-100-00	✓
	<b>Status: Comply</b>	
<b>2.</b>	<b>Implementation of certificate and logo used by Client comply with size and type (shape) against Guideline of Logo Use</b>	<b>X or√</b>
<b>ASA 1.1</b>	Implementation of certificate and logo used by Client comply with size and type (shape) against Guideline of Logo Use. PT SMART Tbk (Parent Company: Golden Agri Resources Ltd) Trademark License Number RSPO-1-0096-11-100-00	✓
	<b>Status: Comply</b>	
<b>3.</b>	<b>Implementation of Certificate and Logo is not used on product</b>	<b>X or√</b>
<b>ASA 1.1</b>	Implementation of Certificate and Logo is not used on product. PT SMART Tbk (Parent Company: Golden Agri Resources Ltd) Trademark License Number RSPO-1-0096-11-100-00	✓
	<b>Status: Comply</b>	
<b>4.</b>	<b>Controlling of Certificate and Logo, including withdrawing inappropriate logo.</b>	<b>X or√</b>
<b>ASA 1.1</b>	PT SMART Tbk (Parent Company: Golden Agri Resources Ltd) Trademark License Number RSPO-1-0096-11-100-00. Controlling of Certificate and Logo, including withdrawing inappropriate logo.	✓
	<b>Status: Comply</b>	

### 3.3 Summary of RSPO Partial Certification.

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

Golden Agri Resources, Ltd Time Bound Plan (TBP) is explained in table 1.10. Golden Agri Resources run forty two (42) mills and one hundred thirty six (136) estates (own and smallholders) in Indonesia and has achieved RSPO certified for twenty eight (28) mills and supply base in Indonesia. Golden Agri Resources, Ltd has informed the TBP progress, MUTU has considered that Golden Agri Resources, Ltd is comply with the RSPO requirement for TBP. The Time Bound Plan was revised and declared by Golden Agri Resources, Ltd on 2 January 2020 made by Head of Sustainability Policy & Compliance.

MUTU has verified partial certification for un-certified unit's subsidiary of Golden Agri Resources, Ltd based on their Time Bound Plan. There are sixteen (16) uncertified management unit of GAR. 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
- The company has followed RSPO requirement related to New Planting Procedure and Remediation and Compensation Procedure.
- There is no labour disputes that are not being resolved through an agreed process
- All plantations established since 2005 have been done so in accordance with the applicable laws of the country and that there is no evidence of non-compliance with law in any of the non-certified holdings which has not been declared above

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.2.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p><b>Company Group/Holding Statement:</b> Companies are already doing internal audits. There are internal audit reports for each company.</p> <p><b>Auditor Verification:</b> Internal Audit report available for uncertified management unit:</p> <ol style="list-style-type: none"> <li>1. PT Sinar Kencana Inti Perkasa (Kasuari Mill and supply base) compliance audit on November 2019</li> <li>2. PT Agrolestari Mandiri (Pekawai Mill and supply base) compliance audit on November 2019</li> <li>3. PT Binasawit Abadi Pratama (Perdana Mill and supply base) compliance audit on December 2019</li> <li>4. PT Agrokarya Prima Lestari (Kuayan Mill and supply base) compliance audit on November 2019</li> <li>5. PT Mitra Karya Agroindo (Tangar Mill and supply base) compliance audit on December 2019</li> <li>6. PT Paramitra Internusa Pratama (Belian Mill and supply base) compliance audit on August 2019</li> <li>7. PT Sawit Mas Sejahtera (Sungai Kikim and supply base) compliance audit on October 2019</li> </ol>

		<p>8. PT Sinar Kencana Inti Perkasa (Sungai Magalau Mill and supply base) compliance audit on January 2019</p> <p>9. PT Agro Lestari Sentosa (Jalemo Mill and supply base) compliance audit on January 2019</p> <p>10. PT Adi Tunggal Mahajaya (Sako Mill) (under construction) compliance audit on December 2019</p> <p>11. PT SMART (Bukit Kapur Mill and supply base) compliance audit on January 2019</p> <p>12. PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base) compliance audit on December 2019</p> <p>13. PT Kresna Duta Agroindo (Gunung Kombeng Mill and supply base) compliance audit on March 2019</p> <p>14. PT Sawitakarya Manunggal (Sawita Mill and supply base) compliance audit on October 2019</p> <p>There 2 companies which under system development. The companies are PT Bahana Karya Semesta and PT Bangun Nusa Mandiri. PT Bahan Karya Semesta is newly acquisition and PT Bangun Nusa Mandiri is on process to construct the mill.</p>
i.	<p>No replacement after dates defined in NIs Criterion 7.3 of:</p> <ul style="list-style-type: none"> <li>• Primary forest.</li> <li>• Any area identified as containing High Conservation Values (HCVs).</li> <li>• Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3.</li> </ul>	<p><b>Company Group/Holding Statement:</b></p> <p>Several companies under GAR were planted above November 2005, while the HCV assessment process was conducted in the period 2010 – 2013.</p> <p>GAR and its subsidiaries have been reporting disclosure and zero liability to RSPO by email dated August 29, 2014.</p> <p>26 companies have been developed after November 2005 and are currently following the RaCP process with progress as of January 12, 2019 as follows:</p> <p>a) 5 report are concept note review in RSPO:</p> <ol style="list-style-type: none"> <li>1. PT Buana Arta Sejahtera – Kalimantan Tengah</li> <li>2. PT Kresna Duta Agroindo – Kalimantan Timur</li> <li>3. PT Agrolestari Sentosa – Kalimantan Tengah</li> <li>4. PT Sumber Indah Perkasa – Papua</li> <li>5. PT Kencana Graha Permai – Kalimantan Barat</li> </ol> <p>b) 20 report need more clarification on LUCA review</p> <ol style="list-style-type: none"> <li>1. PT Satya Kisma Usaha – Jambi</li> <li>2. PT Bumi Sawit Permai – Sumatera Selatan</li> <li>3. PT Sawit Mas Sejahtera (MMM) – Sumatera Selatan 2</li> </ol>

		<ol style="list-style-type: none"> <li>4. PT Sawit Mas Sejahtera (PJP) – Sumatera Selatan 2</li> <li>5. PT Sawit Karya Manunggal – Kalimantan Selatan</li> <li>6. PT Sinar Kencana Inti Perkasa – Kalimantan Selatan</li> <li>7. PT Tapian Nadenggan – Kalimantan Timur</li> <li>8. PT Tapian Nadenggan – Kalimantan Tengah 1</li> <li>9. PT Satya Kisma Usaha – Kalimantan Tengah</li> <li>10. PT Mitra Karya Agroindo – Kalimantan Tengah</li> <li>11. PT Binasawit Abadipratama – Kalimantan Tengah</li> <li>12. PT Aditunggal Mahajaya – Kalimantan Tengah</li> <li>13. PT Agrokarya Primalestari – Kalimantan Tengah</li> <li>14. PT Buana Adhitama – Kalimantan Tengah</li> <li>15. PT Agrolestari Mandiri – Kalimantan Barat</li> <li>16. PT Paramitra Internusa Pratama – Kalimantan Barat</li> <li>17. PT Persada Graha Mandiri – Kalimantan Barat</li> <li>18. PT Bangun Nusa Mandiri – Kalimantan Barat</li> <li>19. PT Kartika Pria Cipta – Kalimantan Barat</li> <li>20. PT Tapian Nadenggan – Kalimantan Tengah 3</li> </ol> <p>c) 1 report on LUCA review process (PT Cahaya Nusa Gemilang – Kalimantan Barat)</p> <p>HCV assessment for 26 companies was conducted in the period of 2010 - 2012, mostly carried out by external parties. HCV assessments are carried out by assessors who have been approved RSPO. reference to the HCV assessment using the Toolkit HCV 2008. peer review is carried out by an independent consultant who has also been approved by the RSPO.</p> <p>The company always takes action on the RaCP process, but only the RSPO for uncertified units can be realized immediately.</p> <p><b>Auditor Verification:</b> Based on auditor verification, not all uncertified unit conduct new clearing after Nov 2005, but for uncertified unit with land clearing after Nov 2005 has follow RaCP. Detail information of uncertified unit are:</p> <ol style="list-style-type: none"> <li>1. PT Sinar Kencana Inti Perkasa (Kasuari Mill and supply base): no new land clearing after Nov 2005 and company already disclose to RSPO.</li> </ol>
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		<ol style="list-style-type: none"> <li>2. PT Agrolestari Mandiri (Pekawai Mill and supply base): LUCA review and the company on process to response the second review.</li> <li>3. PT Binasawit Abadi Pratama (Perdana Mill and supply base): LUCA review and the company on process to response the second review.</li> <li>4. PT Agrokarya Prima Lestari (Kuayan Mill and supply base): LUCA review and the company on process to response the second review.</li> <li>5. PT Mitra Karya Agroindo (Tangar Mill and supply base): LUCA review and the company on process to response the second review.</li> <li>6. PT Paramitra Internusa Pratama (Belian Mill and supply base): LUCA review and the company on process to response the second review.</li> <li>7. PT Sawit Mas Sejahtera (Sungai Kikim and supply base): LUCA review and the company on process to response the second review.</li> <li>8. PT Sinar Kencana Inti Perkasa (Sungai Magalau Mill and supply base): LUCA review and the company on process to response the second review.</li> <li>9. PT Agro Lestari Sentosa (Jalemo Mill and supply base): Concept note review.</li> <li>10. PT Adi Tunggal Mahajaya (Sako Mill) (under construction): LUCA review and the company on process to response the second review.</li> <li>11. PT SMART (Bukit Kapur Mill and supply base): no new land clearing after Nov 2005 and company already disclose to RSPO.</li> <li>12. PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base): Concept note review.</li> <li>13. PT Kresna Duta Agroindo (Gunung Kombeng Mill and supply base): disclose to RSPO</li> <li>14. PT Sawitakarya Manunggal (Sawita Mill and supply base): LUCA review and the company on process to response the second review.</li> </ol>
i.	Any new plantings since January 1 <sup>st</sup> 2010 must comply with the RSPO New Plantings Procedure.	<p><b>Company Group/Holding Statement:</b> GAR and its subsidiaries planted oil palm plantation after January 2010. There were 18 companies that had conducted NPPs and had gone through a public consultation process in April 2014. The companies were:</p> <ol style="list-style-type: none"> <li>1. PT Satya Kisma Usaha – Jambi</li> <li>2. PT Bumi Sawit Permai – Sumatera Selatan</li> </ol>

	<ol style="list-style-type: none"> <li>3. PT Tapan Nadenggan – Kalimantan Timur</li> <li>4. PT Kresna Duta Agroindo – Kalimantan Timur</li> <li>5. PT Mitra Karya Agroindo – Kalimantan Tengah</li> <li>6. PT Binasawit Abadipratama – Kalimantan Tengah</li> <li>7. PT Aditunggal Mahajaya – Kalimantan Tengah</li> <li>8. PT Agrolestari Sentosa – Kalimantan Tengah</li> <li>9. PT Agrokarya Primalestari – Kalimantan Tengah</li> <li>10. PT Buana Adhitama – Kalimantan Tengah</li> <li>11. PT Buana Artha Sejahtera – Kalimantan Tengah</li> <li>12. PT Agrolestari Mandiri – Kalimantan Barat</li> <li>13. PT Paramitra Internusa Persada – Kalimantan Barat</li> <li>14. PT Persada Graha Mandiri – Kalimantan Barat</li> <li>15. PT Bangun Nusa Mandiri – Kalimantan Barat</li> <li>16. PT Kartika Pria Cipta – Kalimantan Barat</li> <li>17. PT Kencana Graha Mandiri – Kalimantan Barat</li> <li>18. PT Cahaya Nusa Gemilang – Kalimantan Barat</li> </ol> <p><b>Auditor Verification:</b> Based on auditor verification, not all uncertified unit conduct new clearing after January 2010 but for all uncertified unit with land clearing after January 2010 has follow NPP. Detail information of uncertified unit are:</p> <ol style="list-style-type: none"> <li>1. PT Sinar Kencana Inti Perkasa (Kasuari Mill and supply base): there is no new land clearing after January 2010</li> <li>2. PT Agrolestari Mandiri (Pekawai Mill and supply base): NPP on 26 April 2014</li> <li>3. PT Binasawit Abadi Pratama (Perdana Mill and supply base): NPP on 8 July 2014</li> <li>4. PT Agrokarya Prima Lestari (Kuayan Mill and supply base): NPP on 26 April 2014 and PT Buana Adhitama (supply base) conduct NPP on 4 June 2014.</li> <li>5. PT Mitra Karya Agroindo (Tangar Mill and supply base): NPP on 26 April 2014</li> <li>6. PT Paramitra Internusa Pratama (Belian Mill and supply base): NPP on 3 June 2014, PT Kartika Prima Cipta (supply base) conduct NPP on 8 July 2014 And PT Persada Graha Mandiri (Supply base) conduct NPP on 6 June 2014.</li> <li>7. PT Sawit Mas Sejahtera (Sungai Kikim and supply base): there is new planting after January 2010 in Sungai Kikim Estate and Sungai Saling Estate, the company not conduct NPP. <b>This is become</b></li> </ol>
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		<p><b>subject of sanction.</b> For PT Buana Sawit Mas (supply base) conduct NPP on 8 July 2014.</p> <p>8. PT Sinar Kencana Inti Perkasa (Sungai Magalau Mill and supply base): there is no new land clearing after January 2010.</p> <p>9. PT Agro Lestari Sentosa (Jalemo Mill and supply base): NPP on 26 April 2014</p> <p>10. PT Adi Tunggal Mahajaya (Sako Mill) (under construction): NPP on 25 April 2014, PT Agrokarya Prima Lestari (supply base) conduct NPP on 26 April 2014 and PT Mitra Karya Agroindo (supply base) conduct NPP on 26 April 2014.</p> <p>11. PT SMART (Bukit Kapur Mill and supply base): there is no new land clearing after January 2010.</p> <p>12. PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base): NPP on 8 July 2014</p> <p>13. PT Kresna Duta Agroindo (Gunung Kombeng Mill and supply base): NPP on 8 July 2014</p> <p>14. PT Sawitakarya Manunggal (Sawita Mill and supply base): there is new land clearing after January 2010 in Sawita KPPA and company not conduct NPP. <b>This is become subject of sanction.</b></p>
ii.	Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	<p><b>Company Group/Holding Statement:</b></p> <p>There are no land conflicts. The Company has a land conflict resolution mechanism in accordance with the RSPO criteria 6.4; 7.5; and 7.6. This procedure is outlined in the <i>SOP Penanganan Konflik Sosial</i> (SOP/SMART/SENS-CSR/SADV/II/02 Rev 1 on 18 May 2016) and <i>SOP Penanganan Keluhan dan Ketidakpuasan</i> (SOP/ SMART/ GIMS-SCDM/ USDVI/ I/ 001 Rev 2 on 11 April 2017). This procedure regulates social conflict settlement agreed. Conflict resolution can be done in a participatory manner and can also be done by a third party (mediator).</p> <p>The company also has procedures to deal with complaints before they become conflicts. The procedure is SOP/ SMART/ GIMS-SCDM/ USDVI/ I/ 001 Rev 2 on 11 April 2017. The company handling complaints appropriately and quickly. GAR has been initiated to become a member of RSPO DSF as a category "growers".</p> <p>Here recap of complaint progress related to GAR which publish in RSPO Website:</p>

	<ol style="list-style-type: none"> <li>1. PT Kartika Prima Cipta (Muara Tawang Estate): complaint by FPP related to FPIC process and the latest information is waiting response from external review which appointed by RSPO and until 3 January 2020 there is no response from RSPO.</li> <li>2. Kapuas Hulu Region (PT Kartika Prima Cipta, PT Persada Graha Mandiri and PT Paramitra Internusa Pratama) related to legality, GAR already reply RSPO email and until 3 January 2020 there is no response from RSPO.</li> <li>3. PT Agrolestari Mandiri (Pekawai Mill), GAR already sent to RSPO related to Indonesian industrial court decisions and until 3 January 2020 there is no response from RSPO.</li> <li>4. PT Kartika Prima Cipta (Muara Tawang Estate): complaint by LinkAr Borneo related to land claim. Update on 29 July 2019 RSPO inform that CP agree to allow withdrawals by LinkAr Borneo.</li> <li>5. Compliance audit which conduct in uncertified unit period 2019 there is no land conflict and unit already socialize <i>SOP Penanganan Keluhan dan Ketidakpuasan</i>, Human Rights Policy and <i>SOP Penanganan Konflik Sosial</i> to internal and external.</li> </ol> <p><b>Auditor Verification:</b> Auditor has verified the supporting evidence of above the company statement. There are no land conflicts for</p> <ol style="list-style-type: none"> <li>1. PT Sinar Kencana Inti Perkasa (Kasuari Mill and supply base)</li> <li>2. PT Binasawit Abadi Pratama (Perdana Mill and supply base)</li> <li>3. PT Agrokarya Prima Lestari (Kuayan Mill and supply base)</li> <li>4. PT Mitra Karya Agroindo (Tangar Mill and supply base)</li> <li>5. PT Sawit Mas Sejahtera (Sungai Kikim and supply base)</li> <li>6. PT Sinar Kencana Inti Perkasa (Sungai Magalau Mill and supply base)</li> <li>7. PT Agro Lestari Sentosa (Jalemo Mill and supply base)</li> <li>8. PT Adi Tunggal Mahajaya (Sako Mill and supply base)</li> <li>9. PT SMART (Bukit Kapur Mill and supply base)</li> <li>10. PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base)</li> </ol>
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		<p>11. PT Kresna Duta Agroindo (Gunung Kombeng Mill and supply base)</p> <p>12. PT Sawitakarya Manunggal (Sawita Mill and supply base)</p> <p>There are any land conflicts but was in the process of completion for:</p> <ul style="list-style-type: none"> <li>- PT Paramitra Internusa Pratama (Belian Mill and supply base). The supply base of Belian mill are PT Kartika Prima Cipta and PT Persada Graha Mandiri.</li> <li>- PT Agrolestari Mandiri (Pekawai Mill and supply base).</li> </ul>
iii.	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	<p><b>Company Group/Holding Statement:</b></p> <p>The company has procedures for handling workers complaints before it become conflict. The procedure is SOP/ SMART/ SIGS-CSR/ SADV/ I/ 003. Procedures related to workers problems are arranged in the internal flow chart because workers are categorized as internal stakeholder. The media of complaint used is an official letter submitted through a union or put into a suggestion box provided at a strategic location.</p> <p>Here recap of complaint progress related to GAR which publish in RSPO Website:</p> <ol style="list-style-type: none"> <li>1. PT Agrolestari Mandiri (Pekawai Mill), Kalimantan Barat, a complaint by the <i>Serikat Buruh Sejahtera Indonesia</i> in Ketapang District on 30 August 2018. The complaint submitted was that the company allegedly laid off workers with violations of Indonesian labor law. the current status is still in progress.</li> <li>2. PT SMART, Sumatera Utara, complaints by 56 workers of PT SMART and local communities in Hamlet of Belongkut I, II and III on 18 October 2018 related to a) the company allegedly did not pay severance in accordance with labor law No. 13 of 2003 to 56 former workers, b) workers suspect that the company is not compliant with CSR related regulations, especially environmental differences. Current status, CP warning letter to the representative of the people of hamlet I / II / III Belongkut.</li> <li>3. PT SMART Tbk, PT MPLWI Sumatra Utara, complaints from <i>Konsulat Cabang Federasi Serikat</i></li> </ol>

		<p><i>Pekerja Metal Indonesia</i> (KC-FSPMI) related to discrimination against workers and women workers who were not given safety equipment and did not get maternity leave and birth leave. The status is currently an internal progress review.</p> <p><b>Auditor Verification:</b> There is information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries, consist of:</p> <ul style="list-style-type: none"> <li>PT Agrolestari Mandiri (Pekawai Mill), company already sent to RSPO related to Indonesian industrial court decisions and until 3 January 2020 there is no response from RSPO.</li> <li>PT Mitrakarya Agroindo: <a href="https://www.mongabay.co.id/2018/08/22/potret-perburuhan-sawit-sinar-mas/">https://www.mongabay.co.id/2018/08/22/potret-perburuhan-sawit-sinar-mas/</a>. GAR has issued media release about Sinar Mas Agribusiness and Food continues efforts to improve worker experience in palm oil operation nationwide. This media release inform the progressively converting our daily workers to permanent status according to their skill and qualification. From late November 2017 until June 2018 company have converted more than 1,300 daily workers to permanent staff for our operations at PT Tapan Nadenggan and PT Mitra Karya Agroindo.</li> <li>PT Sawit Mas Sejahtera: <a href="https://pusaka.or.id/2019/01/surat-protas-atas-tindakan-sewenang-wenang-perusahaan-pt-sawit-mas-sejahtera-terhadap-buruh-perkebunan-dan-aktifis-serikat-buruh-gsbil/">https://pusaka.or.id/2019/01/surat-protas-atas-tindakan-sewenang-wenang-perusahaan-pt-sawit-mas-sejahtera-terhadap-buruh-perkebunan-dan-aktifis-serikat-buruh-gsbil/</a>. Bipartite on 11 April 2019, the parties agreed to terminate the work agreement as of 1 Feb 2019 and withdraw the claim.</li> </ul> <p>There is no labor issue in other uncertified unit.</p>
iv.	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	<p><b>Company Group/Holding Statement:</b> Companies comply with the regulations in accordance with the requirements of the RSPO 2.1 and 2.2 where there is no violation of the rules that are relevant to the plantation. The company has a mechanism to evaluate compliance with regulations, namely SOP/SMART/UMUM/SADV/II/002. In SOP describes procedures for compliance, completeness and groove</p>



	<p>sections which explain in detail to evaluate compliance with the legislation.</p> <p>Subsidiaries of GAR which still on going to process HGU consist of:</p> <ol style="list-style-type: none"> <li>1. PT Djuanda Sawit Lestari (Muara Kandis Estate / Muara Tawas Estate)</li> <li>2. PT Sawit Mas Sejahtera (Sawit Mas Estate)</li> <li>3. PT Bumi Sawit Permai (Bumi Sawit Estate)</li> <li>4. PT Sumber Indah Perkasa (Sungai Buaya Estate, Sungai Merah Estate)</li> <li>5. PT Ivo Mas Tunggal (Samsam Estate, Kandista Estate, Nenggala Estate, Sei Rokan Estate, Ujung Tanjung Estate)</li> <li>6. PT Buana Wiralestari Mas (Nagasakti Estate; Nagamas Estate and Kijang Estate)</li> <li>7. PT Ramajaya Pramukti (Ramarama Estate)</li> <li>8. PT Binasawit Abadipratama (Perdana Estate, Lenggana Estate, Semandau Estate, Muara Dua Estate, Perdana Mill)</li> <li>9. PT Agrokarya Prima Lestari (Mentaya Estate, Kuayan Estate, Bukit Santuhai Estate, Tajur Beras Estate, Seranau Estate, Sungai Sambon Estate, Kuayan Mill)</li> <li>10. PT Buana Adhitama (Sapiri Estate, Bukit Dua Estate, Bukit Tunggal Estate)</li> <li>11. PT Agrolestari Sentosa (Manuhing Estate, Kajui Estate, Balasang Estate, Jalemo Estate, Jalemo Mill)</li> <li>12. PT Mitra Karya Agroindo (Sungai Nusa Estate, Tangar Mill)</li> <li>13. PT Aditunggal Mahajaya (SAYE, Sako Mill)</li> <li>14. PT Satya Kisma Usaha (Medang Sari Estate)</li> <li>15. PT Agrokarya Prima Lestari (Sungai Sambon Estate)</li> <li>16. PT SMART Tbk (Sungai Cantung Estate, Bukit Kapur Estate, Bukit Kapur Mill)</li> <li>17. PT Bangun Nusa Mandiri (Gaharu Estate, Kenari Estate, Keranji Estate, Gaharu Plasma, Kenari Plasma)</li> <li>18. PT FLD (Tanjung Rusa Estate)</li> </ol> <p>Beside that, there are some unit still on process the land certificate (SHM) consist of:</p> <ol style="list-style-type: none"> <li>1. PT Kresna Duta Agroindo (Gunung Kombeng Mill, Gunung Kombeng KKPA)</li> </ol>
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	<ol style="list-style-type: none"> <li>2. PT Ramajaya Pramukti (Ramarama KKPA)</li> <li>3. PT Kresna Duta Agroindo (Tiga Serumpun Estate)</li> <li>4. PT Satya Kisma Usaha (Batang Gading KKPA, KILA)</li> <li>5. PT Agrokarya Prima Lestari (Sungai Sambon Plasma)</li> <li>6. PT Djuanda Lestari (Pandawa KKPA)</li> <li>7. PT Forestra Lestari Dwikarya (Tanjung Rusa KKPA)</li> <li>8. PT Sinar Kencana Inti Perkasa (Sungai Kupang KKPA)</li> <li>9. PT Sawitakarya Manunggal (Sawita KKPA)</li> <li>10. PT Kresna Duta Agroindo (Jakluay KKPA, Bukit Subur KKPA)</li> <li>11. PT Kresna Duta Agroindo (Rantau Panjang KKPA)</li> <li>12. PT Kencana Graha Permai (Kayung Kemitraan, Kencana Kemitraan, Kenanga Kemitraan)</li> <li>13. PT Paramitra Internusa Pratama (Belian KKPA, Muara Tawang KKPA, Kapuas Hulu KKPA)</li> <li>14. PT Mitrakarya Agroindo (Sulin Plasma)</li> <li>15. PT Agrokarya Prima Lestari (Sapiri Plasma)</li> <li>16. PT Adi Tunggal Mahajaya (Sako Plasma)</li> </ol> <p>There are 4 companies which still on process to revise EIA document, consist of:</p> <ol style="list-style-type: none"> <li>1. PT Sinar Kencana Inti Perkasa</li> <li>2. PT Sumber Indah Perkasa</li> <li>3. PT Sawit Mas Sejahtera</li> <li>4. PT Bumi Sawit Permai</li> </ol> <p><b>Auditor Verification:</b></p> <p>Legal process is still going on and there is a detail update progress documented by the company for each year.</p> <ul style="list-style-type: none"> <li>- PT Sinar Kencana Inti Perkasa (Kasuari Mill and supply base), there is a legal non-compliance. Supply base for Kasuari Mill are PT Sinar Kencana Inti Perkasa and PT Sumber Indah Perkasa. The legal non compliance which still on process is EIA revision in PT Sumber Indah Perkasa and Hazardous waste permit in PT Sinar Kencana Inti Perkasa.</li> <li>- PT Binasawit Abadi Pratama (Perdana Mill and supply base), doesn't have land use title (HGU), the HGU is still on process.</li> </ul>
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	<ul style="list-style-type: none"> <li>- PT Agrokarya Prima Lestari (Kuayan Mill and supply base, doesn't have land use title (HGU), the HGU is still on process. Supply base for Kuayan Mill are PT Agrokarya Prima Lestari and PT Buana Adhitama.</li> <li>- PT Mitrakarya Agroindo (Tangar Mill and supply base, doesn't have land use title (HGU), the HGU is still on process.</li> <li>- PT Paramitra Internusa Pratama (Belian Mill and supply base), there is a legal non-compliance. Supply base for Belian Mill are PT Paramitra Internusa Pratama, PT Persada Graha Mandiri and PT Kartika Prima Cipta. For PT Kartika Prima Cipta doesn't have land use title (HGU), the HGU is still on process.</li> <li>- PT Sawit Mas Sejahtera (Sungai Kikim Mill and supply base), there is a legal non-compliance. Supply base for Sungai Kikim Mill are PT Sawit Mas Sejahtera and PT Bumi Sawit Permai. The legal non compliance which still on process is EIA revision.</li> <li>- PT Agrolestari Sentosa (Jalemo Mill and supply base), doesn't have land use title (HGU), the HGU is still on process.</li> <li>- PT Adi Tunggal Mahajaya (Sako Mill and supply base), there is a legal non-compliance. Supply base for Sako Mill are PT Adi Tunggal Mahajaya, PT Mitra Karya Agroindo and PT Agrokarya Prima Lestari. The legal non compliance which still on process is Land Use Title (HGU).</li> <li>- PT SMART Tbk (Bukit Kapur Mill and supply base), doesn't have land use title (HGU), the HGU is still on process.</li> <li>- PT Kresna Duta Agroindo (Gunung Kombeng Mill and supply base, doesn't have land use title (SHM), the SHM is still on process. Supply base for Gunung Kombeng Mill is communities plantation.</li> <li>- PT Bangun Nusa Mandiri (Kenari Mill and supply base), doesn't have land use title (HGU), the HGU is still on process.</li> <li>- PT Djuanda Sawit Lestari: there is an area is still in process for HGU in Muara Kandis Estate (574.58 Ha)</li> </ul>
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	<ul style="list-style-type: none"> <li>- PT Satya Kisma Usaha – Kalimantan Tengah: there is an area is still in process for HGU in Medang Sari Estate (2441 Ha)</li> <li>- PT Sawit Mas Sejahtera: there is an area is still in process for HGU in Sawit Mas Sejahtera Estate (2291 Ha)</li> <li>- PT Bumi Sawit Mas: there is an area is still in process for HGU in Bumi Sawit Mas Estate (773 Ha)</li> <li>- PT Sumber Indah Perkasa: there is an area is still in process for HGU in Sungai Buaya Estate (155.46 Ha) and Sungai Merah Estate (241.54 Ha)</li> <li>- PT Ivomas Tunggal: there is an area is still in process for HGU Samsam Estate (29.09 Ha), Kandista Estate (158.46 Ha), Nenggala Estate (419.9 Ha), Sei Rokan Estate (102.7 Ha), Ujung Tanjung Estate (557.3 Ha)</li> <li>- PT Buana Wiralestari Mas: there is an area is still in process for HGU Naga Mas Estate (253.39 Ha), Naga Sakti Estate (59.79 Ha), Kijang Mas Estate (56.07 Ha)</li> <li>- PT Ramajaya Pramukti: there is an area is still in process for HGU Rama Rama Estate (318.76 Ha)</li> <li>- PT Bumipalma Lestari Persada: there is an area is still in process for HGU Bumi Palma Estate (39.21 Ha)</li> </ul> <p>There are companies that already comply with regulation, consist of:</p> <ul style="list-style-type: none"> <li>• PT Agrolestari Mandiri (Pekawai Mill and supply base).</li> <li>• PT Sinar Kencana Inti Perkasa (Sungai Magalau Mill and supply base).</li> <li>• PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base).</li> <li>• PT Sawitakarya Manunggal (Sawita Mill and supply base).</li> </ul>
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3.4 Identification of Findings, Corrective Action, Observations, Opportunity for Improvement and Noteworthy Positive Components.

3.4.1. Identification of Findings, Corrective Actions and Observations at Re-Certification Assessment

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

**3.4.2. Identification of Findings, Corrective Actions and Observations at ASA-1.1 Assessment**

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



**3.4.3. Opportunity for Improvement**

No	Ref. Std.	Description
1	2.1.1	Company need to ensure the application for a permit to add a hazardous waste type
2	3.5.1	Company could increase worker knowledge about promotion mechanism
3	7.11.2	Company need to ensure the monitoring of fire engine pumping equipment.

**3.4.4. Noteworthy Positive Components**

No	Descriptions
1	The company's commitment in implementing sustainable palm oil management systems (ISPO, ISCC and SMK3)
2	Document presentation, staff competency on relevant aspects and good communication.
3	Improving the quality of housing facilities
4	Good communication with the surrounding community
5	Good water management
6	Provision of drinking water for employees
7	Decrease in GHG emissions
8	Construction of the fire fighting community
9	Community empowerment through integrated ecological agriculture (PET)
10	Company does not use pesticide which active ingredients is paraquat.

**3.5 Summary of Arising Issues from Public and Auditor Verification**

Public Issues (Institution/ NGO/Community)	Auditor Verification
<b>Manpower Agency of Indragiri Hilir</b> <ul style="list-style-type: none"> <li>The company has submitted a mandatory employment report online</li> <li>The company uses contract for work other than core work and has been known by the Manpower Office.</li> <li>Basic wages refer to the Provincial Sectoral Minimum Wage, but for the 2020 minimum wage has not authorized yet by the Governor of Riau. So the company still uses UMSP in 2019.</li> <li>There are no complaints from employees who reach the mediation level. In addition, there are no issues related to labor irregularities, such as worker discrimination, the use of child labor.</li> <li>The company has a trade union and has been registered with the Manpower Office.</li> </ul>	<p>Auditor has verified to all employment aspect regarding minimum wage, salary payment, minimum age, anti discrimination, and complaint.</p>
<b>National Land Agency of Indragiri Hilir</b> <ul style="list-style-type: none"> <li>There are no land disputes or conflicts in the company area.</li> <li>There is no change in HGU.</li> <li>The company has submitted the HGU land use report.</li> </ul>	<p>Auditor has verified to legality aspect regarding land use title, land dispute, etc.</p>
<b>Environment Agency of Indragiri Hilir</b> <ul style="list-style-type: none"> <li>The company has submitted quarterly reports of hazardous waste and RKL RPL implementation reports to the Environment Agency.</li> <li>The company already has a permit to dispose of liquid waste into water bodies.</li> <li>Currently there is an addendum to the hazardous waste storage permit related to the addition of hazardous waste types that may be stored at the storage.</li> <li>There are no complaints related to environmental pollution from the community around the company.</li> <li>There was no land fire in the company area.</li> </ul>	<p>Auditor has verified to all environment aspect regarding mandatory report, waste management, conservation aspect, etc.</p>
<b>Worker union of PT BPLP</b> <ul style="list-style-type: none"> <li>Employees with contract status in upkeep division. The company is currently in the process of appointing contract worker to become a permanent worker.</li> <li>Basic wages still refer to UMSP 2019.</li> <li>There are no complaints related to payment of wages or overtime. All have been paid in accordance with applicable regulations.</li> <li>There are no complaints from workers that cannot be resolved at the bipartite level.</li> </ul>	<p>Auditor has verified to all employment aspect regarding minimum wage, salary payment, minimum age, anti discrimination, and complaint.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<b>Gender Committee of PT BPLP</b> <ul style="list-style-type: none"> <li>• There are no complaints regarding immoral acts in the company.</li> <li>• The company provides menstrual leave and maternity leave for all female workers.</li> <li>• The routine activity of the gender committee is to participate in implementing posyandu.</li> <li>• The company gives special permission to breastfeed for workers who are breastfeeding.</li> </ul>	<p>Auditor has verified to all employment aspect regarding minimum wage, salary payment, minimum age, anti discrimination, and complaint.</p>
<b>Local Contractor of Material Supplier</b> <ul style="list-style-type: none"> <li>• The contractor will provide the materials needed by the company in accordance with the existing delivery order.</li> <li>• There are no complaints related to late payment.</li> </ul>	<p>Company participated in community development by make an agreement with local contractor.</p>
<b>FFB Supplier of third party</b> <ul style="list-style-type: none"> <li>• The price of FFB is determined based on the mill adjusting to market prices.</li> <li>• Every price change will be informed via whatsapp service.</li> <li>• There are no complaints related to the payment of buying and selling FFB.</li> </ul>	<p>Company participated in community development by make an agreement with FFB supplier.</p>
<b>Representative of Suhada, Karya Tani, and Lintas Utara Village</b> <ul style="list-style-type: none"> <li>• The company provides assistance to villages such as free medical treatment, mass circumcision, and integrated ecological agriculture every year.</li> <li>• There are no conflicts or land disputes with the company</li> <li>• There are no customary law communities. The villagers have mingled with the ethnic migrants from Riau and there is no more local wisdom.</li> <li>• The company has been socializing related to areas with high conservation and protected flora and fauna.</li> <li>• There is no environmental pollution.</li> </ul>	<p>Auditor has verified to all social aspect regarding land dispute, CSR, community development, complaintm and also environmental aspect.</p>

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY
4.1	<p><b>Formal Sign-off of Assessment Findings</b></p> <p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <div style="display: flex; justify-content: space-between; align-items: flex-end;"> <div style="text-align: center;"> <p>PT Bumipalma Lestari Persada Head of SPO Certification &amp; Low GHG Emissions Strategy</p>  <p><b><u>Yahya Mustakim</u></b> Friday, 28 February 2020</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><b><u>Leonada</u></b> Friday, 28 February 2020</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	Land Office	Indrigiri Hilir District	-	Visit and Interview	25 February 2020	✓	
2	Environmental and Forestry Agency	Indrigiri Hilir District	-	Visit and Interview	25 February 2020	✓	
3	Plantation Agency	Indrigiri Hilir District	-	Visit and Interview	25 February 2020		✓
4	Manpower Agency	Indrigiri Hilir District	-	Visit and Interview	25 February 2020	✓	
5	Surrounding Communities: • Lintas Utara Village. • Karya Tani Village. • Suhada Village.	Indrigiri Hilir District	-	Interview	26 February 2020	✓	
6	Local Contractor (material supplier)	Indrigiri Hilir District	-	Interview	25 February 2020	✓	
7	Previous Land Owner (11 sampel from 162 person according to compensation documents)  <i>*all sample can't be met, because they have move out and some have passed away.</i>	Indrigiri Hilir District	-	-	26 February 2020		✓
8	Gender Committee	PT BPLP	-	Interview	25 February 2020	✓	
9	Worker cooperative	PT BPLP	-	Interview	25 February 2020	✓	
10	Worker Union (Branch Councils of Worker Union)	PT BPLP	-	Interview	25 February 2020	✓	
11	BPME - Spraying: 4 workers - Harvesting: 3 workers - Housing complex division: 1 workers - Day care: 2 workers - Pesticide warehouse: 1 worker - Fertilizer warehouse: 1 worker - Material warehouse: 1 worker - Workshop: 1 workers	Bumi Palma Estate	-	Visit and Interview	25 February 2020	✓	
12	BPLE	Bumi Lestari Estate	-	Visit and	27 February	✓	

No	Institution/NGO/Community	Address	Phone/Email	Form of Communication	Date of Contact	Response	
						Yes	No
	<ul style="list-style-type: none"> <li>- Spraying: 4 workers</li> <li>- Harvesting: 5 workers</li> <li>- FFB transport: 1 worker</li> <li>- Housing complex division: 1 workers</li> <li>- Day care: 1 workers</li> <li>- Pesticide warehouse: 1 worker</li> <li>- Fertilizer warehouse: 1 worker</li> <li>- Material warehouse: 1 worker</li> <li>- Workshop: 2 workers</li> </ul>			Interview	2020		
13	BSNE <ul style="list-style-type: none"> <li>- Spraying: 4 workers</li> <li>- Harvesting: 4 workers</li> <li>- Fertilizer warehouse: 1 worker</li> <li>- Housing complex division: 1 workers</li> <li>- Daycare: 1 worker</li> <li>- Solar tank: 1 worker</li> <li>- Pesticide warehouse: 1 worker</li> <li>- Material Warehouse: 1 worker</li> <li>- Fertilizer warehouse: 1 worker</li> <li>- Oil Warehouse: 1 worker</li> </ul>	Bumi Sentosa Estate	-	Visit and Interview	26 February 2020	✓	
14	BPMM <ul style="list-style-type: none"> <li>- Security: 2 Security</li> <li>- Loading ramp: 6 workers</li> <li>- Sterillizer station: 1 worker</li> <li>- Press station: 1 worker</li> <li>- Boiler station: 2 worker</li> <li>- Engine room: 1 worker</li> <li>- Kernel station: 1 worker</li> <li>- Chemical warehouse: 1 worker</li> <li>- Empty bunch area: 1 worker</li> <li>- WWTP: 1 worker</li> <li>- WTP: 1 worker</li> <li>- Workshop: 2 workers</li> <li>- Hazardous waste storage: 1 worker</li> <li>- Furnace: 1 worker</li> </ul>	Bumi Palma Mill	-	Visit and Interview	25 February 2020	✓	



No	Institution/NGO/Community	Address	Phone/Email	Form of Communication	Date of Contact	Response	
						Yes	No
15	Sawit watch	Bogor, Indonesia	info@sawitwatch.or.id	Email	17 February 2020		✓
16	WWF	Jakarta, Indonesia	wwf-indonesia@wwf.or.id	Email	17 February 2020		✓
17	WALHI	Jakarta	informasi@walhi.or.id	Email	17 February 2020		✓
18	AMAN	Jakarta, Indonesia	rumahaman@cbn.net.id	Email	17 February 2020		✓

**Appendix 2. Assessment Program**

DATE	24 – 29 February 2020	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 24 February 2020		
08.30 – 10.20	Jakarta – Pekanbaru	All Auditor
10.20 – 18.00	Jakarta – SITE (PT. BPLP)	
19.00 – 20.00	Opening meeting <ul style="list-style-type: none"><li>Auditee Speech (Introduction of PIC, Profile of Certified Management Unit)</li><li>Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification)</li></ul>	
Tuesday, 25 February 2020		
08.00 –12.00	Stakeholders consultation to related agencies in Indragiri Hilir Regency  Field Observation to Bumi Palma Estate Aspect to be verified : <ul style="list-style-type: none"><li>Implementation of Legal Aspect (Land Ownership, Legal Boundaries.</li><li>Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health &amp; Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect</li><li>Implementation of Environmental, and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management), Observation of Workers Facilities (Housing, School, Worship Place), HCV area.</li></ul>	AAS
		HSS HSS
		RAB / LEO
12.00 – 14.00	Break	
14.00 – 17.00	Field observation to Bumi Palma Mill : <ul style="list-style-type: none"><li>Supply Chain verification (FFB Receiving, Weighbridge),</li><li>Implementation of Occupational Health &amp; Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect, security post, FFB Sorting, Processing Activity, Despatch CPO)</li><li>Implementation of Environmental aspect, Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, POME Pond &amp; land application</li></ul> Interview with Gender Committee, Worker’s Union, , Worker’s Cooperative (if any), Local Contractor (for Mill and Estate), Smallholders, Third Party Supplier (if any), local NGO (if any)	LEO HSS  RAB  AAS
Wednesday, 26 February 2020		

DATE	24 – 29 February 2020	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
08.00 – 12.00	Stakeholder consultation to affected communities surrounding the plantations, indigenous peoples, local communities and previous land owners.  <b>Field Observation to Bumi Sentosa Estate</b> Aspect to be verified : <ul style="list-style-type: none"><li>• Implementation of Legal Aspect (Land Ownership, Legal Boundaries), HCV;</li><li>• Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health &amp; Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect</li><li>• Implementation of Environmental, and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management), Observation of Workers Facilities (Housing, School, Worship Place).</li></ul>	<b>AAS</b>  <b>HSS / LEO</b> <b>HSS / LEO</b>  <b>RAB</b>
12.00 – 14.00	<b>Break</b>	
14.00 – 17.00	Continue Field Observation and field observation clarification  <b>Documents Review</b> <ul style="list-style-type: none"><li>• Review of previous assessment findings</li><li>• Verification of Basic Information Mill and Estate</li><li>• Confirmation of Time Bound Plan</li><li>• Review of Partial Certification</li><li>• Verification of P n C documents</li></ul>	<b>All Auditor</b>
<b>Thursday, 27 February 2020</b>		
08.00 – 12.00	<b>Field Observation to Bumi Lestari Estate</b> Aspect to be verified : <ul style="list-style-type: none"><li>• Implementation of Legal Aspect (Land Ownership, Legal Boundaries), HCV;</li><li>• Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health &amp; Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect</li><li>• Implementation of Environmental, and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management), Observation of Workers Facilities (Housing, School, Worship Place).</li></ul>	<b>HSS / AAS</b> <b>HSS / AAS</b>  <b>RAB / LEO</b>
12.00 – 14.00	<b>Break</b>	<b>All Auditor</b>
14.00 – 17.00	<ul style="list-style-type: none"><li>• Continue Field Observation and field observation clarification</li><li>• Verification of documents and completing checklist</li></ul>	
<b>Friday, 28 February 2020</b>		
08.00 – 10.00	<ul style="list-style-type: none"><li>• Continue Field Observation and field observation clarification</li><li>• Verification of documents and completing checklist</li></ul>	<b>All Auditor</b>
10.00 – 12.00	Interim Meeting (closing meeting preparation)	

DATE	24 – 29 February 2020	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
12.00 – 14.00	Break	
14.00 – 15.00	Closing Meeting	
15.00 – ...	Travel to Pekanbaru	
Saturday, 29 February 2020		
11.05 – 12.55	Pekanbaru – Jakarta	All Auditor