

*Roundtable on Sustainable Palm Oil Certification
RSPO*

[√] Surveillance

Name of Management Organisation : Dolok Sinumbah Palm Oil Mill subsidiary of PT Perkebunan Nusantara IV
 Plantation Name : Dolok Sinumbah Estate and Balimbingan Estate
 Location : Village of Dolok Sinumbah, Sub District of Hutabayu Raja, District of Simalungun, Province of Sumatera Utara, Indonesia
 Certificate Code : **MUTU-RSPO/111**
 Date of Certificate Issue : **03 April 2018** Date of License Issue : **03 April 2019**
 Date of Certificate Expiry : **02 April 2023** Date of License Expiry : **02 April 2020**

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-1	29 March – 2 April 2019	Sandra Purba (Lead Auditor), Ardiansyah, Rizliani Aprianita Hasibuan, Yudhi Yuniarto Tallutondok, Brigita Prita	Leonada	Octo H.P.N Nainggolan

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-1	28 June 2019

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Figure 1. Location Map of Dolok Sinumbah POM

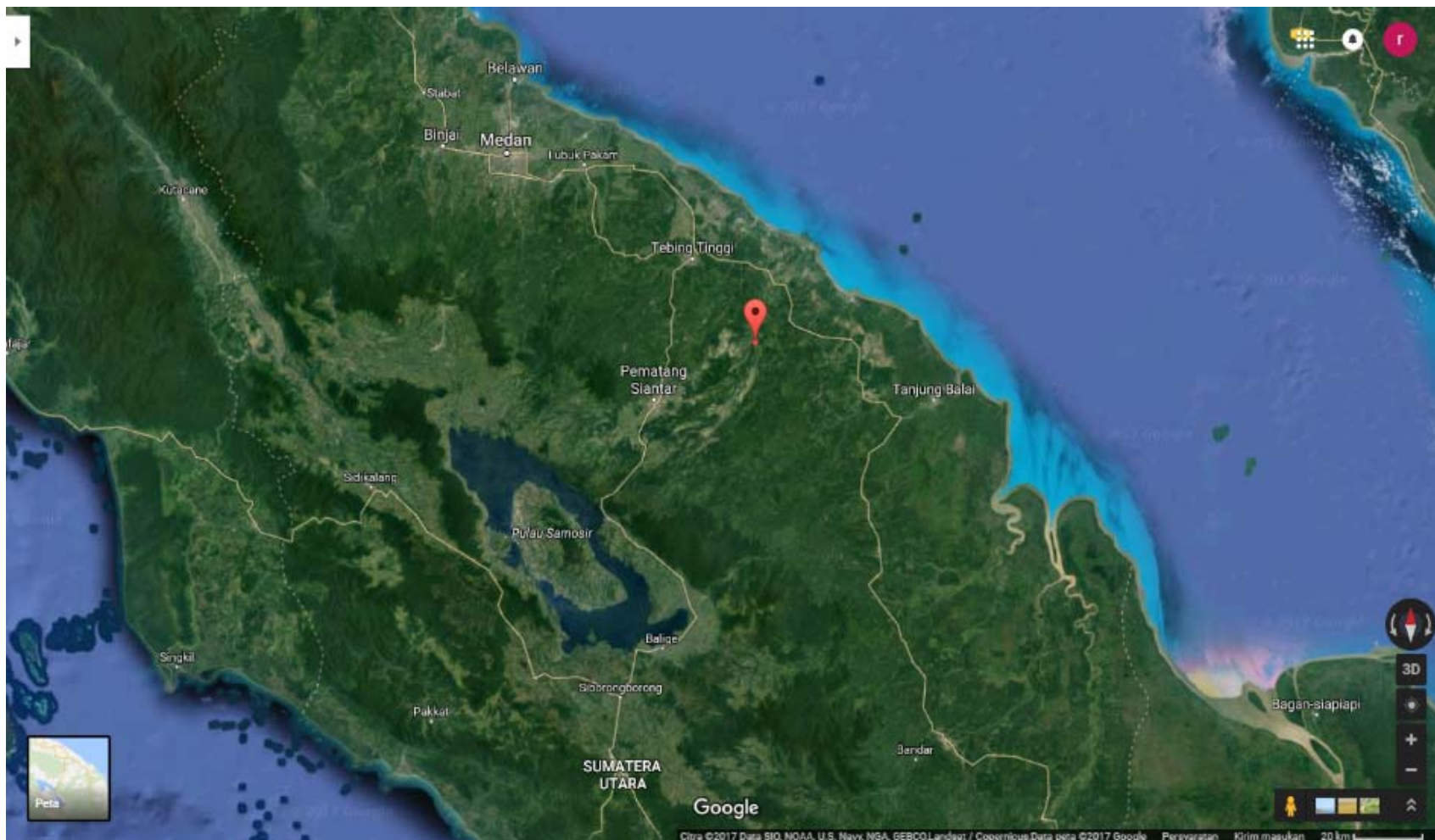


Figure 2. Operational Map of Dolok Sinumbah Estate

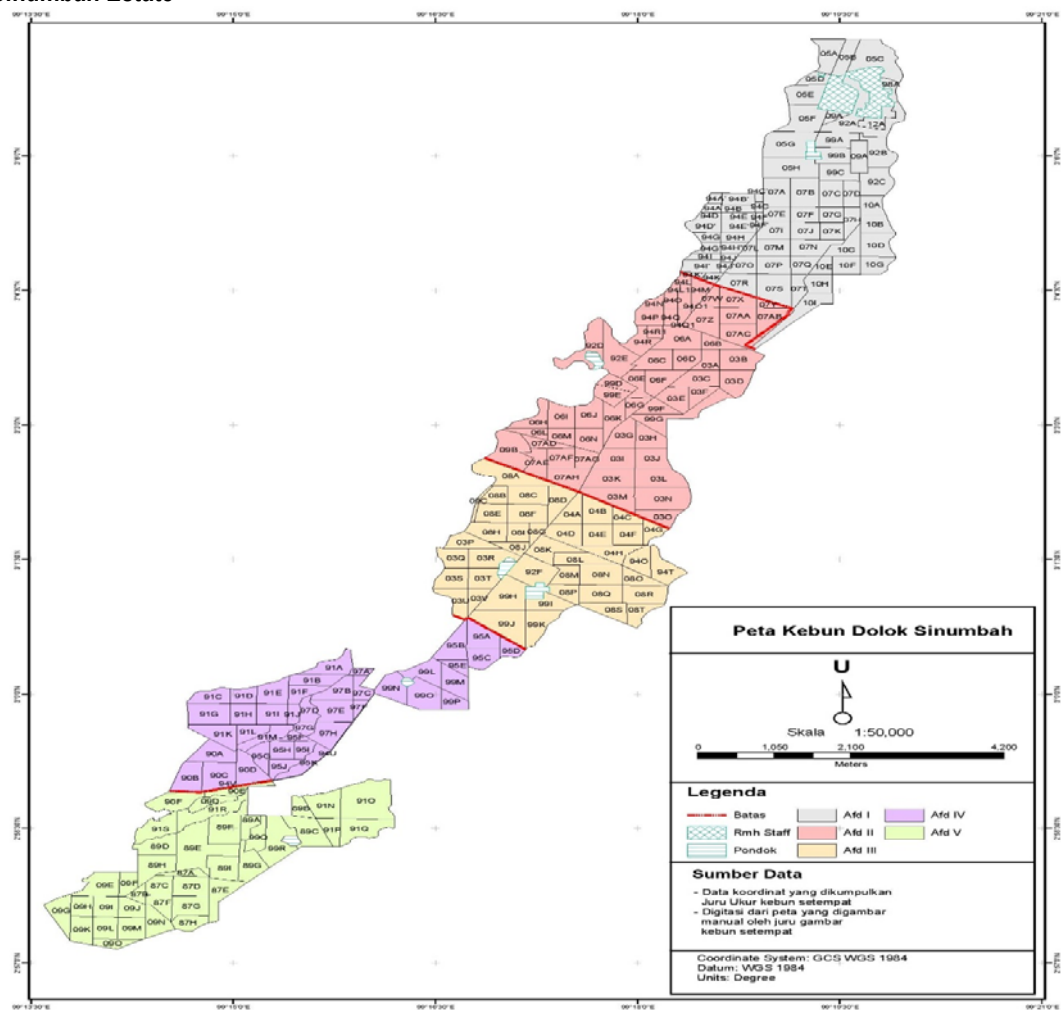
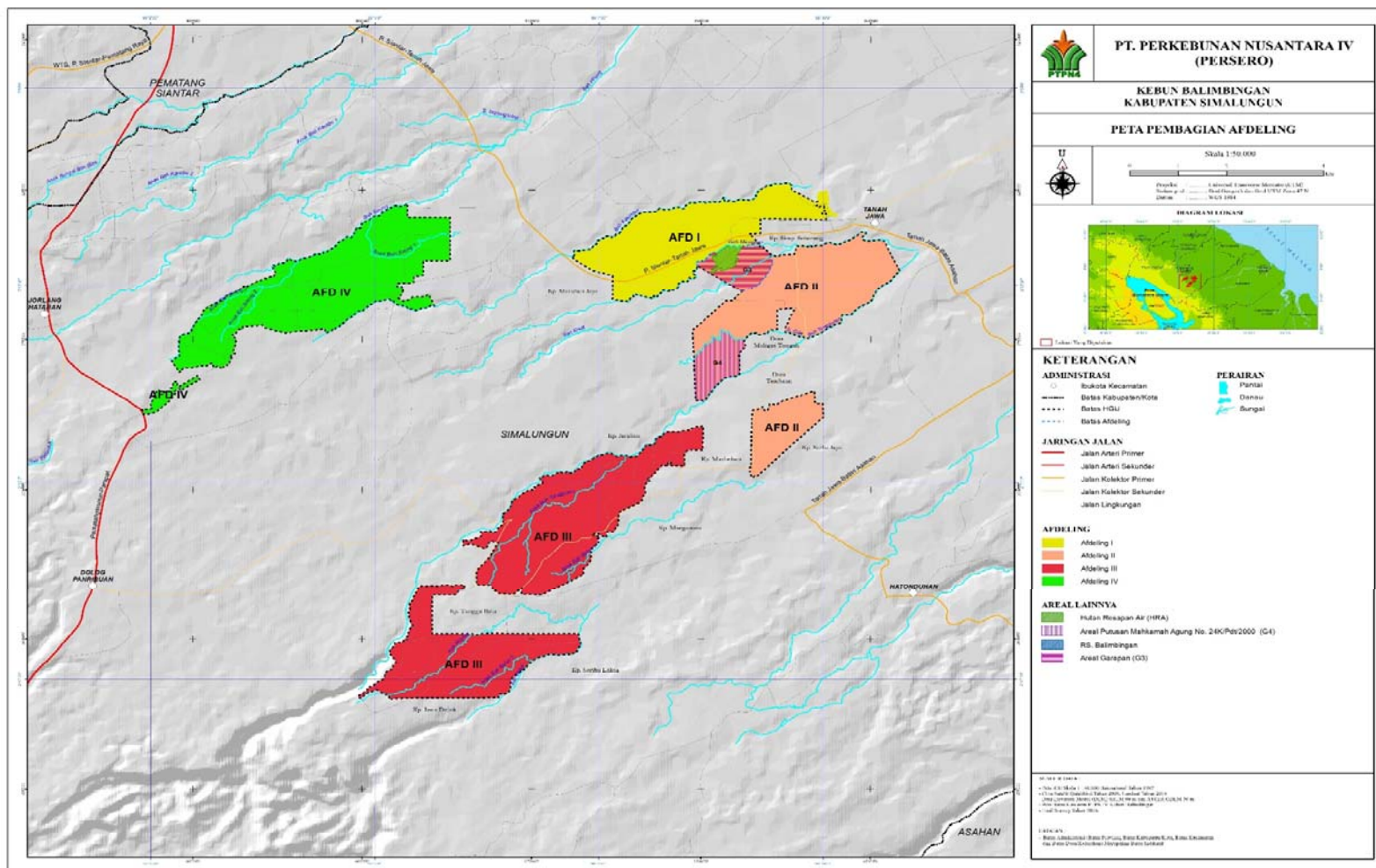


Figure 3. Operational Map of Balimbingan Estate



Abbreviations Used

ASA	:	Annual Surveillance Assessment
BOD	:	Biological Oxygen Demand
BPJS	:	Worker Social Insurance Agency
COC	:	Conduct of Conduct
CPO	:	Crude Palm Oil
CSR	:	Corporate Social Responsibility
EFB	:	Empty Fruit Bunch
FFB	:	Fresh Fruit Bunch
GHG	:	Green House Gas
HCV	:	High Conservation Value
HGU	:	<i>Hak Guna Usaha</i> (Land Use Permit)
HIRARC	:	Hazard Identification Risk Assessment and Risk Control
IPM	:	Integrated Pest Management
ISPO	:	Indonesian Sustainable Palm Oil
IUP	:	<i>Izin Usaha Perkebunan</i> (Plantation Business Permit)
LPUP	:	<i>Laporan Perkembangan Usaha Perkebunan</i> (Plantation Business Report)
MSDS	:	Material Safety Data Sheet
NGO	:	Non Government Organization
OER	:	Oil Extraction Rate
OHS	:	Occupational Health and Safety
P2K3	:	OHS Committee
PKO	:	Palm Kernel Oil
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PPE	:	Personal Protection Equipment
PPKS	:	<i>Pusat Penelitian Kelapa Sawit</i> (Palm Oil Research Centre)
PTPN	:	<i>Perseroan Terbatas Perkebunan Nusantara</i>
RJP	:	<i>Rencana Jangka Panjang</i> (Long-Term Business Plan)
RKL/RPL	:	<i>Rencana Kelola Lingkungan/ Rencana Pemantauan Lingkungan</i> (Environmental Management and Monitoring Plan)
SIA	:	Social Impact Assessment
SOP	:	Standard Operational Procedures
Walhi	:	<i>Wahana Lingkungan Hidup</i>
WTP	:	Water Treatment Plant
WWF	:	World Wide Fund
WWTP	:	Waste Water Treatment Plant

1.0 SCOPE of the CERTIFICATION ASSESSMENT			
1.1 Assessment Standard Used		<ul style="list-style-type: none"> • <i>Indonesian National Interpretation of RSPO Principles and Criteria 2013 by INA-NITF, July 2016 (Endorsed by the RSPO Board of Governors meeting on 30th September 2016)</i> • <i>RSPO Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014, Revised on 14 June 2017</i> • <i>RSPO Certification System June 2007, revised March 2011</i> 	
1.2 Organisation Information			
1.2.1	Organisation name listed in the certificate	PT Perkebunan Nusantara IV - Kebun Balimbingan	
1.2.2	Contact person	Dhanny Hermawan	
1.2.3	Organisation address and site address	RSPO Registered Company: Jalan Letjen Suprpto No. 2, Kode Post 20151, Medan, Sumatera Utara, Indonesia.	
1.2.4	Telephone	(62-61) 415 4666	
1.2.5	Fax	(62-61) 457 3117	
1.2.6	E-mail	perencanaan@ptpn4.co.id	
1.2.7	Web page address	www.ptpn4.co.id	
1.2.8	Management Representative who completed the application for certification	Khayamuddin Panjaitan	
1.2.9	Registered as RSPO member	1-0082-09-000-00 - 29 June 2009	
1.3 Type of Assessment			
1.3.1	Scope of Assessment and Number of Management Unit	Palm Oil Mill and supply base: Dolok Sinumbah POM, Dolok Sinumbah Estate and Balimbingan Estate.	
1.3.2	Type of certificate	Single	
1.4 Locations of Mill and Plantation			
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			Latitude Longitude
	Dolok Sinumbah POM	Dolok Sinumbah Village, Hutabayu Raja Sub District, Simalungun District, Sumatera Utara Province , Indonesia	3° 6' 42" N 99° 19' 46" E
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			Latitude Longitude
	Dolok Sinumbah Estate	Dolok Sinumbah Village, Hutabayu Raja Sub District, Simalungun District, Sumatera Utara Province , Indonesia	3° 6' 46" N 99° 19' 46" E

Balimbingan Estate	Balimbingan Village, Tanah Jawa Sub-district, Simalungun District, Sumatera Utara Province, Indonesia	2° 53' 21" N	99° 09' 00" E
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1.5 Description of Area Statement

1.5.1	Tenure	
	• State	10,314.91 Ha
	• Community	- Ha

1.5.2 Area Statement

	Dolok Sinumbah Estate (Ha)	Balimbingan Estate (Ha)	Total (Ha)
• Total area	4,159.57	3,911.94	8,071.51
• Planted	3,757.00	3,086.17	6,843.17
- Mature area	2,853.00	3,086.17	5,939.17
- Immature area	904.00	-	904.00
• Reserves area	114.00	29.22	143.22
• Nursery	-	9.81	9.81
• IOPRI area	1.00	3.00	4.00
• Building and mill	182.71	57.22	239.93
• Infrastructure	102.00	82.90	184.90
• Cemetery	2.86	2.81	5.67
• Riparian zone	-	386.25	386.25
• Water body	-	3.31	3.31
• Occupation	-	104.96	104.96
• Others	-	146.29	146.29

*Area of 2,173.40 Ha is used by Bah Jambi Estate, 49 Ha is used by Marihat Estate and 21 Ha is used by Balimbingan hospital

* HCV area has include on planting area and emplacement area: 331.09 Ha

1.6 Planting Year and Cycles

1.6.1 Age profile of planting year

Planting Year	Hectarage (Ha)		
	Dolok Sinumbah Estate	Balimbingan Estate	Total
1994	227	296.00	523.00
1995	140	1,067.00	1,207.00
1996	-	1,649.00	1,649.00
1997	76	-	76.00
1998	18	-	18.00
1999	317	12.00	329.00
2003	402	-	402.00
2004	130	-	130.00
2005	163	-	163.00
2006	207	-	207.00
2007	499	-	499.00
2008	317	34.50	351.50
2009	204	-	204.00
2010	143	27.67	170.67

	2012	10	-	10.00			
	Sub Total Mature Area	2,853.00	3,086.17	5,939.17			
	2015	100	-	100.00			
	2016	804	-	804.00			
	Sub Total Immature Area	904.00	-	904.00			
	TOTAL	3,757	3,086.17	6,843.17			
1.6.2	New Planting area after January 2010		- Ha				
1.6.3	Planting Cycle		3 rd Cycle				
1.7	Description of Mill and Supply Base						
1.7.1	Description of Mill						
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel	
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)
	Dolok Sinumbah	30	144,056.02	33,314.338	23.13	5,357.207	4.15
	<i>*Production data source from April 2018 to March 2019</i>						
1.7.2	Description of Certification Scope of Supply Base						
	Name of Estate	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ ha/ year)	Supplied to Mill	
						FFB (tonnes/year)	%
	Dolok Sinumbah	4,159.57	3,757.00	66,489.48	17.70	66,489.48	100
	Balimbingan	3,911.94	3,086.17	50,256.66	16.28	50,256.66	100
	TOTAL	8,071.51	6,843.17	116,746.14	17.06	116,746.14	100
	<i>*Production data source from April 2018 to March 2019</i>						
1.7.3	FFB description from other source						
	Name of sources/Organisation	Type of Organisation	number of smallholders	Production Area (Ha)	Supplied to Mill		
					FFB (tonnes/year)		
	Dolok Sinumbah Estate (Non-certified)	PTPN IV	-	2,853.00	11,647.22		
	Balimbingan Estate (Non-certified)	PTPN IV	-	3,086.17	238.29		
	Marjandi Estate (Non-certified)	PTPN IV	-	1,802.00	8,714.11		
	Bah Birong Ulu Estate (Non-certified)	PTPN IV	-	2,175.40	3,570.22		
	Marihat Estate (Non-certified)	PTPN IV	-	3,704.50	547.63		
	Dolok Sinumbah Estate Blok B09B (Non-certified)	PTPN IV	-	35.94	693.01		
	Third party (Non-certified)	FFB trader	-	-	2,083.00		
	TOTAL					27,493.48	
	<i>*Production data source from April 2018 to March 2019</i>						
1.7.4	Product categories			FFB, CPO, PK			

1.8 Tonnage of Product									
1.8.1	Past Annual Claim Certified Product		Previous Certificate Claim (tonnes/ year)		Actual certified product (tonnes/ year)				
	• FFB Production		150,768		104,141.456				
	• CPO Production		41,177		26,741.186				
	• Palm Kernel (PK) Production		5,594		4,033.545				
1.8.2 Product selling									
		Tonnage of selling product		Actual selling product period (tonnes/ year)					
		• CSPO		1,500					
		• CSPK		-					
		• CSPO under other scheme trading (e.g ISCC, RFS)		-					
		• CSPO under conventional trading (if any)		15,094.98					
		• CSPK under other scheme		2,888.89					
		• CSPK under conventional trading (if any)		-					
1.8.3 Estimate of Certified FFB Claim									
		Name of Estates	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/ year)			
		Dolok Sinumbah	4,159.57	3,757.00	67,626	18.00			
		Balimbangan	3,911.94	3,086.17	52,465	17.00			
		TOTAL	8,071.51	6,843.17	120,091	17.55			
<i>*Projected FFB production for 3 April 2019 to 2 April 2020</i>									
1.8.4 Estimate of Certified Palm Product Claim									
		Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/ 9 moths)	CPO		Palm Kernel		Supply Chain Module
					Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)	
		Dolok Sinumbah	30	120,091	28,822	24	4,804	4	MB
<i>*Projected CSPO and CSPK production for 3 April 2019 to 2 April 2020</i>									
1.9 Other Certifications									
		SMK3		-					
		Others		-					
1.10 Time Bound Plan									
1.10.1 Time Bound Plan for Other Management Units									
		Management Unit		Estate (Supply Base)	Time Bound	Location	Status		
		Mill	Time Bound						
		Pabatu	2015	Pabatu	2015	Serdang Bedagai, Sumatera Utara	Certified		
		Dolok Ilir	2015	Dolok Ilir	2015	Simalungun, Sumatera Utara	Certified		
				Laras	2018	Simalungun, Sumatera Utara	Certified		

Pulu Raja	2015	Pulu Raja	2015	Asahan, Sumatera Utara	Certified
Adolina	2018	Adolina	2018	Serdang Bedagai dan Deli Serdang, Sumatera Utara	Certified
Bah Jambi	2018	Bah Jambi	2018	Simalungun, Sumatera Utara	Certified
		Marihat	2018	Simalungun, Sumatera Utara	Certified
		Bah Birung Ulu	2021	Simalungun, Sumatera Utara	-
		Marjandi	2018	Simalungun, Sumatera Utara	Certified
		Marjandi HGU on progress	2019	Simalungun, Sumatera Utara	-
Dolok Sinumbah	2018	Dolok Sinumbah	2018	Simalungun, Sumatera Utara	Certified
		Dolok Sinumbah HGU on progress	2021	Simalungun, Sumatera Utara	-
		Balimbangan	2018	Simalungun, Sumatera Utara	Certified
Mayang	2019	Mayang	2019	Simalungun, Sumatera Utara	IC
		Bukit Lima	2019	Simalungun, Sumatera Utara	-
Gunung Bayu	2019	Gunung Bayu	2019	Simalungun, Sumatera Utara	IC
		Tanah Itam Ulu	2019	Simalungun, Sumatera Utara	IC
Tinjowan	2018	Tinjowan	2018	Simalungun, Sumatera Utara	-
		Aek Nauli	2018	Simalungun, Sumatera Utara	-
		Padang Matinggi	2018	Simalungun, Sumatera Utara	-
Air Batu	2018	Air Batu	2018	Asahan, Sumatera Utara	IC
		Air Batu HGU on progress (459.02 Ha)	2021	Asahan, Sumatera Utara	-
Berangir	2018	Berangir	2018	Labuhan Batu Utara, Sumatera Utara	Certified
Sawit Langkat	2018	Sawit Langkat	2018	Langkat, Sumatera Utara	Certified
		Sawit Langkat HGU on progress (301.50 Ha)	2021	Langkat, Sumatera Utara	-
Pasir Mandoge	2021	Pasir Mandoge	2021	Asahan, Sumatera Utara	-
		Sei Kopas	2021	Asahan, Sumatera Utara	-
		Tonduhan	2021	Simalungun, Sumatera Utara	-
Timur	2021	Timur	2021	Mandailing Natal, Sumatera Utara	-
		Balap	2021	Mandailing Natal, Sumatera Utara	-
Ajamu	2019	Ajamu	2019	Labuhan Batu Utara, Sumatera Utara	IC
		Meranti Paham	2019	Labuhan Batu Utara, Sumatera Utara	IC
		Panai Jaya	2021	Labuhan Batu Utara, Sumatera Utara	-
Sosa	2021	Sosa	2021	Padang Lawas, Sumatera Utara	-
PT Agro Sinergi Nusantara		PT Agro Sinergi Nusantara	2021	Aceh Barat, Aceh	-
PT Sinergi Perkebunan Nusantara		PT Sinergi Perkebunan Nusantara	2021	Morowali Utara, Sulawesi	-

1.10.2	Progress of Associated Smallholders and Outgrowers for Certifiable Standard
	PTPN IV- Dolok Sinumbah POM does not have scheme smallholders.

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-1	<p>1. Sandra Purba (Lead Auditor Witnessed). Graduated from Forestry Faculty Bachelor Degree, majored in Forest Product Technology. Have experience working in industrial forest company, mining and oil palm plantations company for 6 (six) years as EHS and Sustainability Assistant. Has been certified as General OHS Expert, attend and passed the several trainings of management system (OHS, environment and quality management), has been attend the training of waste management, GHG verification and validator training, and conflict resolution and mapping training. Have been successfully passed the Indonesian Sustainable Palm Oil (ISPO) Lead Auditor training course, RSPO lead auditor training course and auditor of RSPO Next. Involve in many audit activities of similar scheme (ISPO) since April 2013 covering the Legal Aspect, Environmental aspect, Social Aspect, Health and Safety Aspect, conservation and Worker Welfare. During this audit, she assigned to verify legal aspect land dispute, HCV and SCCS.</p> <p>2. Ardiansyah (Lead Auditor Witnessing). Indonesian citizen, Bachelor of Forest Resources Conservation, Department of Forestry. Had work experience in Environmental NGO for 6 month (2007) and consultant for making EIA Document and KLHS for 3 years (2009 – 2012). Had attend training such as RSPO Lead Auditor course, Lead Auditor ISPO, OHSAS (SIO 18001 – 2007), land cover crop mapping and Management System Certification (ISO 9001-2008), Environmental Management System Certification (ISO 14001-2004), Social Auditing and Conflict Resolution. Had many times following audit activities related to sustainable palm oil certification system which is ISPO as an auditor since 2012 for legal, environmental aspect, conservation and social. Fluent in Bahasa and Malay. At the time of audit he conduct witness to lead auditor.</p> <p>3. Yudhi Yuniarto Tallutondok (Auditor). Indonesian citizen, Bachelor of Fisheries, Padjadjaran University. Have experience of working over three years since 2013 as plantation operations staff in private palm oil plantation companies in Indonesia. Training have been followed including Auditor of Indonesian Sustainable Palm Oil (ISPO), Lead Auditor of Roundtable on Sustainable Palm Oil (RSPO) P&C, Lead Auditor of ISO 9001:2015, ISO 14001:2015, ISO 22000:2009, ISO 19011:2011, Social Accountability 8000, Basic Management Development Program Agronomy, Fire Anticipation on Land and Forest, Potential Mapping and Conflict Resolution in Production Forests, Awareness ISO 17021 and ISO 17065. Has participated in audit activities for the ISPO and RSPO scheme since 2017 for agronomy, OHS, labor, social and legality aspects. In this audit activity performs the assessment of Best Management Practices and OHS.</p> <p>4. Brigitta Prita (Auditor). Citizen of Indonesia. Bachelor of Forestry, Department of Forest Resources Conservation and Ecotourism. She had attended Training ISPO by Commission ISPO on June 2013, Training ISO 9001:2008 Quality Management System on January 2014, In House Training 17021 and 17065 management system and Product Quality, Training High Conservation Value by IPB on September 2015, In House Training HCV on August 2016, In House Training Roundtable Sustainable Palm Oil on January 2014; In House Training ISO 14000:2004 Environmental Management System; Training Lead Auditor RSPO by Daemeter & Proforest. She has been audit experience ISPO & RSPO since April 2013 in the environmental, conservation, waste management and worker welfare aspects. During this audit, she verify environment, HCV and worker welfare.</p> <p>5. Rizliani Aprianita Hsb (Auditor). Indonesian Citizen. Bachelor and Magister of Agribusiness, Faculty of Agriculture. She had followed training such as RSPO Lead Auditor Training, SCCS training, SA 8000 training, lead Auditor ISO 9001;2008, ISO 14001;2004, ISPO Auditor training and followed several IHT related to environment, BMP etc. She has been involved in several audit activities related to sustainable palm oil certification since 2015 covering social aspect, health and safety aspect, worker welfare and waste management aspect. During this assessment, she assigned to verify of social aspect and worker welfare.</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA-1	<p>Number of auditors : 4 auditor Number of days for ASA-1 at site : 4 days Number of working days for ASA-1 at site : 16 Working days</p>
2.2.2	Assessment Process

<p>ASA-1</p>	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the Dolok Sinumbah Mill subsidiary of PTPN IV to the requirements of Indonesian National Interpretation of RSPO Principles and Criteria, July 2013 (endorsed by the RSPO Board of Governors meeting on 30th September 2016) and RSPO Supply Chain Certification Standard for Organizations Seeking or Holding Certification Adopted by The RSPO Board or Governors on November 21st 2014, Revised June 2017 (Module D/E for CPO Mill).</p> <p>The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) <i>interview</i>, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site.</p> <p>Some opportunities for improvement of the results ASA-1 delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase (ASA-2). All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA-1.</p> <p>The assessment program please find Appendix 2</p>
<p>2.2.3</p>	<p>Locations of Assessment</p>
<p>ASA-1</p>	<p>Number of units in this certification activity are two estates, which supply the raw material (FFB) to one palm oil mill. In conducting the assessment, the team of auditors used the 0.8√y formula to determine the management units sampling to be focused on and also considered the issues raised by stakeholder. Based on this formula, the team of auditors determined that the sampling locations are one palm oil mill (Dolok Sinumbah POM) and two estates (Dolok Sinumbah Estate and Balimbingan Estate)</p> <p>Dolok Sinumbah Mill</p> <ol style="list-style-type: none"> 1. Waste Water Treatment Plant. Field observations and interviews with WWTP operators regarding waste water management. 2. Solid waste area. Observation related to waste management and observation of leachate drainage. 3. Chemical material warehouse. Field observations and interview with a warehouse clerk related to chemical management. 4. Workshop. Observations and interviews with workers related to the management and implementation of health safety, worker welfare, competency and training. 5. Hazardous waste temporary warehouse. Field observations related to the fulfillment of OHS attributes, recording, and the implementation of compliance requirements hazardous waste temporary warehouse. 6. Water Treatment Plan. Observation and interview with operator about OHS implementation, management of hazardous waste. 7. Weighbridge Station. Observation and interview with the worker about supply chain procedure. 8. Loading Ramp Station. Observation and interview with sortation personnel related to personnel understanding over sortation procedure, the implementation of sortation, fruit criteria, and fruit separation with ripeness and rawness criteria. 9. Sterilizer Station. Interview about safety work implementation, PPE's and work accident. 10. Boiler Station. Auditor was interview boiler operator, boiler man has license. Company was provide PPE's every year. Fibers and shell is used as fuel to reduce fossil fuel consumption and maximize renewable energy. 11. Hydrant simulation. Observation condition of pipe and nozzle, water pressure and fire team. 12. Transfer carriage and process station. Observation and interviews about safe working practices, PPE, process machine. <p>Dolok Sinumbah Estate</p> <ol style="list-style-type: none"> 13. Harvesting, block of 03UV and 08 EH/IJ, Afd 4. Observation and interview with workers related to OSH, worker welfare, complaint and SOP. 14. Road maintenance, block of 08M, Afd III. Observation and interview with workers related to OSH, worker welfare, complaint and SOP. 15. HGU pole, BPN79 (block of 97A) and BPN76 (block of 2016J). Observation to HGU boundary, there were no over-planting.

16. **Housing of Afdeling 2.** Observation and interview related facilities, domestic waste, grievance and others.
17. **Rinse home for chemical.** Observation and interview related management of chemical, OHS and others.
18. **Landfill Block 96 M afdeling 2.** Observation related domestic waste.
19. **Housing of Afdeling 3.** Observation and interview related facilities, domestic waste, grievance and others.
20. **Fertilizer storage.** Observation and interview related management of fertilizer.
21. **Land application Block 99A Afdeling 1.** Observation and interview related management of liquid waste.
22. **Landfill near Afdeling III office.** Observation related domestic waste.
23. **Riparian area Bah Kasindir Block 97 A Afdeling IV.** Observation related management of riparian area, spray limit, and others.

Balimbingan Estate

24. **Circle and Path spraying, Block 95E.** Observation and interview related to safe spray work, OHS, labor, and welfare aspect.
25. **Harvesting, Block 96BF.** Observation and interview related to safe harvesting work, OHS, labor, and welfare aspect.
26. **Road Maintenance. Block 96BM.** Observation regarding manual road maintenance to facilitate FFB transport access.
27. **Slope Area. Block 96AZ.** Observations related to soil conservation were carried out for certain slope areas.
28. **HGU pole BPN124 (block of 95BS/Afd 4).** Observation to HGU boundary, there were no over-planting.
29. **HGU pole BPN123 (block of 99C/Afd 4).** Observation to HGU boundary, there were no over-planting.
30. **HGU pole BPN127 (block of 95B).** Observation to HGU boundary, there were no over-planting.
31. **HGU pole BPN128 block of 96CM.** Observation to HGU boundary, there were no over-planting.
32. **Riparian area of Kasinder River, block of 95 BS.** Observation to HGU boundary, there were no over-planting.
33. **HGU pole BPN144, block of 96CN.** Observation to HGU boundary, there were no over-planting.
34. **Riparian area of Bah Birung River, block of 96CN.** Observation to HGU boundary, there were no over-planting.
35. **Chemical storage.** Observation and interviews related to chemical and pesticide storage area, hazardous waste management, employment, and implementation OHS.
36. **Fertilizer storage.** Observation and interviews related to waste management and implementation OHS.
37. **Fuel Storage.** Observation related to implementation of OHS
38. **Hazardous Waste Storage.** Observation and interviews related to hazardous waste management, OHS implementation, employment and complaint mechanism.
39. **Fire Fighter Warehouse.** To observe completeness and readiness of fire fighter equipment.
40. **Workshop.** Observation and interviews related to the competence of workers, implementation OHS (including medical check up), employment, waste management and complaint mechanism.

Stakeholder

- **Government Agency (Labor agency, Agriculture agency, Environmental agency).** Interview related to compliance of regulation, environmental issue, safety issue and reporting.
- **Balimbingan Villages, Totap Majawa Villages, Tangga Batu Village, Marubun Jaya Village, Hatonduhan Sub-district, Tanah Jawa Sub-district, Dolok Sinumbah Village, Marihat Bandar Village and Timba'an Village.** Interview the head of village and community representation related to social interaction between company and community surround, and another social issues.

2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ASA-1	<p>Summary of stakeholder consultation process</p> <p>Consultation of stakeholders for Dolok Sinumbah POM subsidiary of PTPN IV was held by:</p> <ol style="list-style-type: none"> 1. Public announcement on the MUTU website (www.mutucertification.com) at 11 March 2019. 2. Stakeholder consultations with NGOs have been conducted by sending questionnaires via email to several NGOs (WWF, Walhi, Sawit Watch) on March 22nd 2019. 3. Public consultation meeting with internal stakeholders (worker union, committee gender, local contractor and local

	<p>communities) by interviews at 30 March 2019.</p> <p>4. Stakeholder consultations with government have been conducted by interview to several governments in Simalungun District on April 1st 2019.</p> <p>Numbers of input from stakeholders were clarified by Dolok Sinumbah POM subsidiary of PTPN IV</p>
2.3.2	Stakeholder contacted
	<i>Please find appendix 1</i>
2.4	Determining Next Assessment
	The next visit (ASA-2) will be determined 8 to 12 months after certified issued.

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Dolok Sinumbah POM – PT Perkebunan Nusantara IV operation consisting of one (1) mill and one (2) oil palm estates.

During the assessment, there were ten (10) Nonconformities were assigned against Major Compliance Indicators; two (2) nonconformities were assigned against Minor Compliance Indicators; and one (2) nonconformance against supply chain requirement for CPO mill and six (5) opportunities for improvement were identified.

Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5. The company has already prepared and implemented the corrective actions that had been reviewed and accepted by Auditors in form of documentation evidences e.g. (document record/photographic/etc...). Those corrective actions taken that consist of ten (10) Major non-conformities, three (3) Minor non-conformities against P&C RSPO and two (2) against supply chain requirement for CPO mill had been closed out shall be verified during next assessment.

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

Therefore MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is Continued.

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
PRINCIPLE #1 COMMITMENT TO TRANSPARENCY		
1.1 Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.		
1.1.1; 1.1.2 CH has the list of stakeholder updated on December 2018, consist of government, community leader, contractors, labor union, pers etc. The result of interview with management, stakeholders list are updated every 6 months or if there is a change in organization management of stakeholder. CH has information list that can be accessed by relevant stakeholders, namely: <ul style="list-style-type: none"> • Company profile • Annual report • Document of Plantation Business Permit, SEIA, and Land Use Tittle, • OHS Document • HCV Document • Complaint and grievents • Public Summary of Certification Assessment • Etc. Information request and response managed by HR and General Assistants and it was has been known by the stakeholder. Procedure for respond to stakeholder is also written on “SOP Masa simpan permintaan Informasi dan Tanggapan” dated		

1st August 2017. It explains the procedure for information request and responses at the head office and business units. Based on procedure, the time to respond to information is 30 work days.

The CH was documented all of incoming and outgoing letter from stakeholder. Based on document verification of incoming letter and the respond by the company until April 2019 there was no request for information, there was only a request for assistance and has been fully responded.

Recording and recapitulation of communication letters and stakeholder consultation in more detail. **OFI**

Status: Comply

1.2 Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.

1.2.1

The CH has list of document that can be accessed publicly and documents that can be accessed publicly which is written on Director's decree No. 04.03/Kpts/02/II/2018 on 5th February 2018 about Publication of Company Documents of PT Perkebunan Nusantara IV. The public documents, such as :

- Company profile
- Annual report
- Document of Plantation Business Permit, SEIA, and Land Use Tittle,
- OHS Document
- HCV Document
- Complaint and grievents
- Public Summary of Certification Assessment
- Etc.

The result of interview with stakeholders such as the relevant Agency, said that the types of information that can be accessed from the company, for example information relating to the environment, labor, business permits, etc. The results of the interview were conveyed, that the company always gave responses if there was information needed by the agency either through mail or telephone.

Status: Comply

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

1.3.1

PTPN IV has a written policy that contains a commitment to the code of integrity and ethical behavior contained in the Code of Conduct compiled in 2013, Chapter V Prohibition for Business Actors. This chapter contains guidelines for behavior relating to conflicts of interest, "KKN" (collusion, corruption and nepotism) and bribery, political activities, drugs and gambling, and disgraceful acts which constitute a prohibition on business people. Every businessman is prohibited from doing "*KKN/ Korupsi, Kolusi, Nepotisme*" (corruption, collusion, and nepotism) and Bribery (Gratification).

Code of conduct socialization :

- Record of socialization on March 8 2019 was attended by 33 participants.
- Record of socialization on April 17 2018 was attended by 24 participants.

Based on interview with workers, labor union, and local contractors, said hat the company has socialized and provided a copy of the company's code of conduct.

Status: Comply

PRINCIPLE #2 COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS

2.1

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

The CH has a list of updated legal requirements as of January 2019, which includes relevant regulations relating to the RSPO and the number of regulations identified as many as 342 consisting of Local, National and International Regulations that have been ratified

Best Practices.

- The company has all of its pesticide registered under the 2016 national list of agriculture and forestry pesticide.
- The company does not use any restricted or prohibited pesticide.
- All pesticide users have been trained properly and use PPE while conduct spraying activity.
- Medical surveillance have been conducted twice a year for pesticide operator.

Worker Welfare

- The CH has set a minimum wage in accordance with the stipulation of government minimum wages, namely the Determination of the Minimum Wage in Simalungun District in 2018 in accordance with North Sumatra Governor Decree No. 188.44/575/KPTS/2017 on November 1, 2017. Based on the result of interview with Labor Unions and workers at Dolok Sinumbah and Balimbingan, it was stated that for wage adjustments in 2019 will be included in April payroll.
- The CH has also paid overtime wages in accordance with the Decree of the Minister of Manpower and Transmigration No. 102 of 2004 concerning Overtime Work and Overtime Work Wages.
- The CH has also registered its workers in the “BPJS Kesehatan dan Ketenagkerjaan” program in accordance with applicable regulations.

2.1.2; 2.1.3; 2.1.4

The CH already has a list and a copy of the applicable laws and regulations. The legal requirements documentation system contained in *Pedoman Dasar dan Instruksi Kerja Identifikasi dan Evaluasi Kepatuhan terhadap Peraturan Perundang-Undangan dan Persyaratan Lainnya* with document no. 04.01/KOL/KOL/P/034 revision 00 dated 31 August 2018. The SOP explained that the Head of the Corporate Legal and investor relations Sub-Section at least annually identifies and updates the laws and other requirements. while the implementation of regulations and other requirements is carried out by the Division / District / Unit and evaluated by the Head of District / GM District / Manager Unit / Chair of P2K3.

In the case of updates to laws and regulations, obtained from the internet or information from the head of the sub-section, General HR assistant and Security in the District / Unit, Secretary of P2K3 or related agencies. Evaluation of compliance with legislation and other requirements is carried out regularly at least once a year. An evaluation for compliance with regulations was carried out in March 2019.

Status: Comply

2.2

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

2.2.1

CH has land rights to manage plantations consisting extension of Land Use Title (HGU) and Plantation Business Permit. The Land Use Title covering 10,314.91 Ha, consisting of 3 HGU certificate. Plantation Business Permit issued in 2012 covering 10,314.91 Ha issued by Simalungun Regent. The area manage by CH is 8,071.51 Ha consist of 6,843.17 Ha planted area and 1,228.34 Ha for other areas. There are 2,243 .40 Ha from HGU area which exclude form certification scope because under manage by other estate in PTPN IV.

Based on information obtained from historical documents of the company, information in Land Use Title and clarification from Land Agency, PTPN IV is a nationalization company from Dutch Colonial which had long existed before Indonesia independence and has been nationalized. So that the acquisition of land is not through the compensation against individuals or to customary land.

2.2.2

Based on explanation from CH, the coordinate of HGU is not provided by government because this plantation already exists since Dutch Colonial. CH has been conducted inventory of HGU marker and also inform in boundary map. The result of field observation found that some poles in broke condition and some poles in good condition. This is already meet with the result of monitoring that conducting by CH in July 2018. CH has conduct coordination with PTPN IV HQ to complete all the HGU markers in 2019. Based on the explanation non-conformity 2017.07 is closed and will be observed in next assessment.

Based on document review and the results of interviews, it was found that there was an area of approximately 2 ha which was released from HGU Balimbingan Estate (Afdeling IV) during HGU extension in 2008. The results of the field visit revealed that there were no boundaries between Balimbing Estate and the area that had been released from the HGU. This is become **Non-conformity No. 2019.01 with minor category**.

2.2.3; 2.2.4 & 2.2.5

Based on area statement and management interviews, as well as observation of Afdeling II Block 96B/D, there was a land dispute with the Pandawa Lima Group starting in 1995 in an area of 104.96 ha. The area of the dispute has been mapped in the documentation of land dispute settlement and operational map. This dispute has been reported to Land Agency of Simalungun Regency and has been through legal process from 1997 until 2010, the case was won by the management unit in accordance with the decision of the Simalungun District Court No. 13/Pdt/PLW/2009/PN.SIM dated 2 March 2010. This is also meet with Decision of the Supreme Court of the Republic of Indonesia No. 780 K / Pdt / 2013 dated July 19, 2013 stating that the area is part of the legal PTPN IV HGU. But based on interview with the CH revealed that the area had not been managed by Balimbingan Estate because awaiting a decision from PTPN IV HQ.

The results of interviews with stakeholders (agencies, villages and sub-districts) revealed that there were no land conflicts during 2018.

2.2.6

This is in accordance with the procedure of conflict resolution (No. SPO 04 dated 2 January 2015) stating that dispute settlement is pursued by deliberation, the best solution for the parties, to the legal path, and not using violence. The management unit also has code of conduct which is inscribed to circumvent insitigated to maintain peace within the management unit operational activities.

2.2.2 | Status: Non-conformity No. 2019.01 with minor category

2.3

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

2.3.1; 2.3.2, 2.3.3, 2.3.4

Based on information obtained from historical documents of the company, information in Land Use Title and clarification from Government Agency, Balimbingan Estate and Dolok Sinumbah Estate of PTPN IV is a nationalization company from Dutch Colonial which had long existed before Indonesia independence and has been nationalized. So that the acquisition of land is not through the compensation against individuals or to customary land.

Result of consultation with communities (Balimbingan Villages, Totap Majawa Villages, Tangga Batu Village, Marubun Jaya Village, Hatonduhan Sub-district, Tanah Jawa Sub-district, Dolok Sinumbah Village, Marihat Bandar Village and Timba'an Village) are known that there is no significant land dispute, due to the management unit seeks completion by deliberation, good legal mechanism, and non-violence, in accordance with procedure of conflict resolution (No. SPO 04 dated 2 January 2015).

Status: Comply

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

3.1

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

3.1.1 and 3.1.2

The Company has management plan that contained in the document of Work Plan and Corporate Budget in the period 2015-2019 which describes the production of FFB, CPO Production, Production Kernel, OER, KER, operating costs, the financial indicators (income vs. costs), etc.

The company has set a plan of replanting (2020-2024), is described in the following table:

Unit	Years of Replanting (Ha)				
	2020	2021	2022	2023	2024
Dolok Sinumbah	161,00	-	94,00	18,00	325,00
Balimbingan	168,00	168,00	148,00	148,00	-
Total	329,00	168,00	242,00	166,00	325,00

Replanting program has been considering performance indicators such as yield/ha (<14 tons FFB/hectare), plant age (> 25 years), plant height (> 13 meters) and the density of plants per hectare (<100 trees/hectare). Type of seed that will be used is certified and registered by Government.

Status: Comply

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

4.1

Operating procedures are appropriately documented and consistently implemented and monitored.

4.1.1

The company has procedures for oil palm cultivation and palm oil processing which are available in Indonesian. Oil palm cultivation procedures include land clearing, water and soil conservation, integrated pest management, plant upkeep, harvesting and transportation whereas for palm oil processing procedures include FFB receipts, FFB grading, FFB processing, and CPO quality sampling.

Based on interviews with management revealed that a copy of the procedure was in each unit. When the audit activity takes place, the company can show the entire procedure to the auditor.

The results of field observations and interviews with employees in the estate and mill revealed that each employee understood their respective working procedures, for example for harvester in Dolok Sinumbah and Balimbingan Estate can explain the criteria for fresh fruit bunches, cutting and arranging fronds, preparation of FFB at the fruit collecting point. While for mill employees in the engine room section can explain monitoring and checking tools and functions of generators and turbines, employees can also explain the time of use between turbines and generators.

4.1.2 and 4.1.3

The company has an Internal Audit SOP that explains the work procedures which form the basis for plantation and factory operational activities that refer to the principles of sustainability

The results of interviews with management known that the implementation of internal audits is conducted annually on a regular basis covering the implementation of all estate procedures, administration of bank cash and trade payables, inventory, wage and personnel administration, vehicle assets, heavy equipment, machinery and follow-up previous internal audit reports.

When the audit activity takes place, the company can show the results of the internal audit document carried out on February 11 – 13, 2019 in Balimbingan Estate and December 13 – 18, 2018 in Dolok Sinumbah Estate by the Quality Management Department. The company has taken corrective action on internal audit findings and was declared fulfilled by the Quality Management Department.

Status: Comply

4.2

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

sustained yield.

4.2.1; 4.2.2 and 4.2.3

The company has a fertilizer procedure with the number Dok. A.10. The procedure explains that fertilizer recommendations must be made based on the results of analysis of leaf and soil samples. Based on the company's Palm Oil Cultivation Guidelines, it is explained that leaf sampling and analysis are carried out once a year and soil sampling is carried out every five years.

During the audit activity the company shows the following documents on the results of soil and leaf analysis:

- Soil analysis was carried out in 2014 in the PPKS Medan Testing Laboratory. Test parameters include moisture content, cadmium, lead, oil content, exchange cation, calcium, magnesium, iron, manganese, aluminum, potassium, cation exchange capacity, and base saturation. During the audit activity, the company has not carried out soil analysis activities for the period of 2019, this is because the sampling schedule and soil analysis will be carried out in May 2019.
- Results of leaf analysis by PPKS Medan Testing Laboratory on December 2018 for 5 leaf samples (Balimbingan Estate), and 25 leaf samples (Dolok Sinumbah Estate). Test parameters include N, P, K, Mg, Ca, B, Cu, and Zn.

Based on the results of leaf samples analysis in 2018, the company issued fertilizer recommendations for 2019 for example for Dolok Sinumbah Estate as follows: Urea with a plan of 2,434.58 tons; TSP 1,343.42 tons; MOP 2,225.38 tons; Dolomite 2,101.27 tons; and Borate 57.47 tons.

During the audit activity the company can show fertilization monitoring that explains the application dosage, application tonnage, and fertilizer use/tons FFB, for example: Balimbingan Estate realization of fertilization in 2018 (January – December Period) for NPK 15.7-24+1TE with a total application of 596.97 tons; and Dolomite 325.13 tons.

4.2.4.

The company shows the waste utilization document with the following details:

1. Liquid Waste.
The company does not use liquid waste because mill and estate are not in the same area. In addition > 90% of the plantation area is peat soil.
2. Empty Bunch
The company use factory solid waste as organic fertilizer such as empty bunch. During the audit, the company showed empty bunch application documents for the January-November period. From the document it is known that up to now the company has applied 1,056 tons for empty bunch.
3. Fiber and shell are used as boiler fuel.

Status: Comply

4.3

Practices minimize and control erosion and degradation of soils.

4.3.1

The company has a PTPN IV Balimbingan Estate and PTPN IV Dolok Sinumbah Estate Soil Analysis Report with a scale of 1: 35,000 dated May 1, 2015. The document equipped with legend soil map units, roads, rivers, cities, estate boundary and division boundary.

4.3.2

The company has a management strategy for planting in slope areas contained in the Procedures for Oil Palm Cultivation. The document describes the management area on sloping area, among others: conservation terrace (for slopes 0 - 2°), terrace with a width of 4 meters (for slopes of 6° - 12°), terrace with a width of 3 – 3.5 meters (for slopes of 20° - 25°), planting cover crops and empty fruit bunch applications.

Based on field observations at Dolok Sinumbah Estate known that there is a certain slope area with an area of 804 Ha and has been made a contour terrace with a length of 23,268 meters

4.3.3

The company shows the realization of manual road maintenance in the form of Road Maintenance Maps for the period January - December 2018. The document explains the progress of manual road maintenance. From the document it is known that for the years 2018 to December the road that has been maintained reaches 51,404 meters for Balimbingan Estate and 75,850 meters for Dolok Sinumbah Estate.

Based on the results of field observations it is known that the company has made improvements to roads and bridges to facilitate the transportation of FFB

4.3.4 and 4.3.5

Based on the verification of the company's semi-detailed land survey report document, it was found that there was no identification of land with peat classification in the company's operational area.

4.3.6

Strategies for fragile and other problem soils are included in the semi-detailed soil survey report. The report describes the level of land suitability along with the actions that need to be taken to raise the level of land suitability. Based on the report it is known that the limiting factors in land in the company's operational areas include low nutrient content, steep slope land, and sandy soil.

Some recommended strategies include:

- Increasing the organic content of the soil through recycling nutrients, namely the application of EFB and POME, laying the frond in the joint and between the staples.
- Carry out fertilization based on the results of leaf and soil analysis that is carried out regularly.
- Making a terrace system on steep slopes, planting *Munaua bracteata* and laying the frond parallel to the direction of the contour,

Status: Comply

4.4

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

4.4.1.

Balimbingan & Dolok Sinumbah Estate:

Water source management and maintenance for 2018 period with details:

- Test the quality of river water and springs regularly.
- Supervise and reforest in riparian and springs area.
- Making appeal signs to preserve the area and maintain water sources.
- Socialization to workers to preserve the environment and water in the riparian area.

The company shows the estate water source and Mill monitoring and management program in 2019 with the following details: Monitoring along the waterway (riparian area) every 6 months; Monitoring of community activities entering the water source area every 6 months; and others.

4.4.2.

Based on field observations in Block 97 A Afdeling IV riparian area of Bah Kasindir, it is known that riparian area has been planted with palm oil in 2016; there is no spray limit, there is no HCV area information board and there are former chemical spraying activities. In addition, the results of the identification study and HCV map for the period of 2011 revealed that the area entered into the HCV Area with HCV 4 attributes.

This is not in accordance with the mechanism procedure of riparian area management (05) January 2nd, 2015; such as marking riparian area and conservation area; make prohibition on the riparian area, on the riparian area which has been planted with palm oil, the vegetation should be maintained with a ban on spraying; planting / enrichment in empty riparian area or bushes and others. Based on that it's become **Non-conformity 2019.02 with Major Category.**

4.4.3.

The company has an extension of the license to use industrial wastewater Palm oil in PTPN IV. In accordance with the decree of the Regent of Simalungun No. 188.45 / 3436 / LINGHUP-2015 dated October 23rd, 2015 with a validity period of up to 5 years from the date of stipulation.

The company has permits related to the utilization of the waste contained in the permit extension for the utilization of industrial wastewater on land accordance with the decree of the regent of Simalungun no. 188.45 / 3436 / LINGHUP-2015 dated October 23rd, 2015 and is valid for 5 years. Based on the initial permit to use wastewater no. 188.45 / 263 / LINGHUP-2010, that the permitted Land location is block 92 and block 99 Afdeling 1.

The company shows documents on testing the quality of liquid waste water carried out by the Medan Industrial Research & Standardization Center accredited by KAN LP621, based on testing result there is no parameter (TSS, Ph & BOD) exceed the threshold according with Decision of Minister Number 29 year 2003. Field observations in the Block 99 A, it is known that there is no runoff, the waste water disposal location is in accordance with the permit for waste water utilization.

4.4.4.

The average water usage for the 2018 period is 17,494.33 m³ with the efficiency of water use per ton FFB of 1.42 m³ / ton FFB.

Status: Non-conformity 2019.02 with Major Category.

4.5

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

4.5.1 and 4.5.2

The company has an integrated pest management procedure that explains how to control pests in biology, chemistry and manually. In addition, the company also has a Cultivation Guidebook which also explains related to Pest and Disease control. In the book, an early warning system is explained, for example, periodic detection for leaf eater caterpillar and rat censuses are done every 2 months.

The company is committed to implementing integrated pest management (IPM), this is demonstrated by utilizing beneficial plants and natural predators. In this case, the company shows documents related to planting and maintenance of beneficial plants for the period of 2018, for example, Balimbingan Estate has planted a 128 ha beneficial plant, while Dolok Sibumbuh Estate has planted 27 Ha *Turnera subulata* and 18 Ha *Antogonon leptosus*.

The interview with the management revealed that the company routinely conducted training for IPM employees, for example IPM training conducted on October 3 - 4, 2018 at the Balimbingan Estate Office and was attended by 30 employees. Documentation, material and attendance lists are available during the audit activity.

During the audit activity, the company shows pest monitoring documents period of January - February 2019 for Balimbingan Estate and Dolok Sinumbuh Estate. Based on document verification, it was found that there were no pests that exceeded the threshold.

Based on field observations in the Balimbingan Estate and Dolok Sinumbuh Estate it is known that each estate has planted a beneficial plant as a form of implementation of integrated pest management (IPM).

Status: Comply

4.6

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

4.6.1; 4.6.2 and 4.6.5

The company has a policy on safety in using chemicals listed in the procedures for managing hazardous material, hazardous waste and procedure for weed, pests and diseases control with the number DOS-PRO 4.3.12 revision 3. In the procedure, it is explained about the use of PPE for employees and management of used pesticide containers.

Based on interviews with management revealed that to avoid the development of resistance, the company used a rotation

spraying system and use different types of pesticides in each rotation. During the audit, the company showed a chemical justification document for the period of 2018 at Balimbingan Estate and Dolok Sinumbah Estate by identifying trade names, active ingredients, active ingredients, LD50, WHO classification, Type, shape, character, application method, function and justification.

The company also has a pesticide use program contained in the annual budget document, while the realization is reported in the Estate Manager's monthly report. The document explains the trademark and active ingredients of pesticides, target weeds, dosages per hectare, monthly use of materials and recapitulation, and the extent of application.

Based on field observations and interviews with pesticide applicators on Balimbingan Estate and Dolok Sinumbah Estate are known as follows:

- Employees have understood work procedures that are safe in using chemicals such as spraying techniques, target weeds for each pesticide, use of PPE and actions taken when poisoning occurs.
- Regular employees get direction from supervisor before work and also get regular internal training by the company.
- The company provides facilities for storing work tools and PPE as well as places for bathing employees when completing the application of pesticides.
- Employees bring food from home, the company in this case provides clean water and soap to clean hands before eating and the location of the place to eat must be different from the location of the application of pesticides.
- The company provides PPE for each employee free of charge and if broken will be given a replacement PPE with the provision of returning the broken PPE.
- Supervisors always carry a first aid kit that will be used as first aid when there is a work accident. The results of checking are known that the contents of the first aid kit are complete and ready to use.

4.6.3

The company has an integrated pest management plan listed in the Division's work document and document Pest control activity plan consisting of detection and identification of pests, rat census, census of leaf eater caterpillar, application of chemical rat control and planting of beneficial plants (*Turnera subulata* and *Antigonon leptosus*).

4.6.4

The company shows the Pesticide List document in the 2018 Classification that identifies trademarks, active ingredients, LD 50 (mg / kg), WHO classification and product classification.

The company has a policy to minimize the use of Paraquat dichloride listed in the Internal Memo from Plantation Division Head on August 4, 2006. In the memorandum, it is explained that The company is committed to no longer using pesticides with the active ingredient Paraquat dichloride since 2007.

The results of the pesticide use document study show that the company no longer use pesticides made from Paraquat dichloride from 2007

Based on field observations and interviews with pesticide applicators on Balimbingan Estate and Dolok Sinumbah Estate revealed that spraying activities used Glyphosate, while the results of physical verification in the chemical warehouse are in accordance with the inventory records at Balimbingan Estate, it is known that pesticides are available with Sun Up, Elang, and Decis.

4.6.6 & 4.6.10.

Dolok Sinumbah Estate.

The company shows evidence of the submission of hazardous waste Dolok Sinumbah Mill on February 26th, 2019 to PT Jagar Prima Nusantara with vehicle number BP 9149 with manifest number WY 0003023 such as: Used jerry cans as much as 144 kg; Ex chemical cans as much as 15 kg and Ex chemical bottle as much as 183 kg.

Balimbingan Estate.

The company shows the minutes of submission of hazardous waste on February 14th, 2019 by PT Jagar Prima Nusantara, such as: contaminated package as much as 132 kg (manifest number WY 0003012).

4.6.7

The company has a procedure for managing and storing chemicals with Number 23 dated March 4, 2019. In point 6.7.6 of the procedure it is explained that mixing chemicals is only done at home rinse the available ones. However, based on field observations for the circle and path spraying activities in Block 95E Balimbing Estate Division I, it is known that mixing pesticides is done in the field where it is not in accordance with the procedures that the company has so that this becomes a non-conformity **Non-conformity No. 2019.03**.

4.6.8

Based on the document verification, field observations, and management interviews, known that the company did not apply the application of pesticides through the air.

4.6.9

The company shows training documents to employees and scheme smallholder related to the use and handling of pesticides as follows:

- Training on spray techniques and handling of pesticides on October 3 - 4, 2018 is located at Balimbingan Estate office. Documentation, material and attendance lists are available during the audit activity.
- Training on spray techniques and handling of pesticides on August 1 - 7, 2018 is located at Dolok Sinumbah Estate office. Documentation, material and attendance lists are available during the audit activity.

4.6.11

Both the Balimbingan and Dolok Sinumbah estate are shows a list of pesticide operators, namely 42 workers in Balimbingan and 25 workers in Dolok Sinumbah. Health checks on pesticide operator have been carried out routinely every year, these checks include blood biochemical examination, cholinesterase, urine, x-ray, ECG and blood pressure. The latest medical check-up are conducted on 27-30 Nov and 3 December 2018 to as much as 42 pesticide applicator in Balimbingan Estate. Latest medical check-up for pesticide applicator in Dolok Sinumbah Estate are held on 27 Nov 2018 to as much as 25 workers. The MCU to the both unit are done by PT Prima Medica Nusantara (Laras Hospital). The result of MCU is normal for all workers involved.

Observed during field visit to the spraying activities in both estate, it was known that there is no indication of chemical exposure such as skin irritation and itches, also there is no grievance and complain conveyed by workers during interview.

4.6.12

The mechanism for early detection of female workers who is pregnant and/or breast-feeding describes in Estate Manager circular letter no.: BAL/SE/Intern/III/2019 on 4 March 2019 (BAL) and no.: DOS/SE.Intern/05/II/2018, on 3 Jan 2018 (Dolok Sinumbah). It was describes that Field assistant who will appoint female employees as pesticide handlers must coordinate in advance with the polyclinic staff and carry out periodic monitoring every month.

Based on field visit there was no female workers who is pregnant or breast-feeding in Balimbingan Estate. There is no activity of chemical spraying in Dolok Sinumbah Estate during ASA 1.

4.6.7	Status: Non-conformity No. 2019.03 with minor category
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4.7
An occupational health and safety plan is documented, effectively communicated and implemented.

4.7.1

The Balimbingan Estate and Dolok Sinumbah Estate has an OHS policy authorized on 24 October 2014 by Unit Manager and SP.BUN Chairman. It was contain the management unit' commitment to implement the OHS in all operational area referring to the Indonesia national regulation.

Balimbingan and Dolok Sinumbah Estate has set up an OSH program, can be demonstrated OHS program for 2019, among others: monthly meetings, P2K3 (OHS) reporting, risk assessment, OHS inspection, pesticide applicator health checks, OHS training and internal audit. Evidence of implementation is shown, for example by carrying out routine OHS workplace inspections in monthly basis, conducting fire inspection and first aid equipment inspections on a regular basis, carrying out routine health checks for spraying applicator annually and identifying hazard and risk management for all operational activities.

4.7.2

In the procedure of Risk Management No. 4.2.1 dated July 1, 2015, it is explained how to prepare, evaluate and identify hazards and their controls. Balimbingan and Dolok Sinumbah have identified hazards and risks for its all operational activities and established a control plan for each hazard and identified risks.

The HIRAC 2018 document is verified by the auditor, which informs: type of activity / facility, type of hazard, type of risk, assessment (consequence, opportunity, and level of risk), risk control, person in charge, and risk control review status. One of risk and hazard controls set in HIRAC document is the use of appropriate PPE during working. Both estate have determined the types and specifications of PPE that are appropriate for each activity.

However, based on field observations there are HIRAC that are not implemented, namely:

- 3 persons of agrochemical applicator in Balimbingan Estate are not use PPE (apron) but using the orange uniform which is absorbed and does not protect from chemical exposure to the body.
- The generator operator in Balimbingan Estate does not use safety shoes while working (using AP boot shoes)
- The chemical warehouse clerk in Dolok Sinumbah Estate uses leather and rubber gloves but the leather gloves have been damaged.
- Hoisting crane operators in mill do not use gloves.
- The sterilizer operator does not use PPE safety shoes (wearing PPE boots)
- Observed in Dolok Sinumbah Estate Block of 03U Afd III harvesting activities, the workers do not use glasses and gloves
- Interviews with Chemical operators and observed to the PPE storage in Dolok Sinumbah Afd III, known that the company provided PPE spray uniforms (uniform orange fabric), the uniform made from absorbing and not protecting from chemical exposure to the body.

Related to this, both business units have not been able to show evidence that the specified risk control plan has been implemented and monitored its effectiveness. It's become **Non-conformity No: 2019.04**.

HIRAC socialization to employees has been conducted, for example socialization on September 20, 2018 at Estate of Balimbingan and on January 26, 2019 to as many as 24 workers at Dolok Sinumbah mill.

4.7.3

The OHS training program are explained in the company's OHS program for the period of 2019, the implementation of training can be demonstrated, for example:

- First aid training was carried out on March 14, 2019 to as many as 26 first aider at Balimbingan Estate
- Electricity technician training in Balimbingan Estate, for example certificate no.: reg.12748 / TK3-LIST / VI / 2016-P0 dated June 20, 2016.
- Fire training and simulation and emergency response carried out on February 28, 2018 involving the Dolok Sinumbah mill emergency response team and African employees, the number of participants was 40 people.
- Can be shown the evidence of heavy operator training namely operator license and certificate, for example: certificate of boiler operators no.: ser.338 / OPK3 / B.I / V / 2013, extension of SIO was carried out in April 2018; certificate of operator turbine Ser.14.43 / OP.TU.K3 / PTP / VII / 2014; and certificate of lifting and transport equipment operator Ser.2518 / OPK3 / PAA-OC / VII / 2015

The mechanism of replacement of damaged PPE is listed in SE Manager (no.: BAL/SE/Intern/11/1/2019 for Balimbingan and no.: DOS/SE/intern/01/1/2019 for Dolok Sinumbah), stating that identification of damaged PPE is carried out by monitoring the completeness of PPE monthly by the technical assistant. During document review, field observations and interviews with employees, auditor observed the following:

- The evidence of employee PPE monitoring has not been shown and interviews with the secretary of Balimbingan' OSH committee told that monitoring of damaged PPE is only done once a year during PPE replacement according schedule.
- Dolok Sinumbah estate shows evidence of PPE distribution on January 13, 2018, but it has not been shown the evidence of PPE distribution for 2019 to employees
- Dolok Sinumbah estate has not yet shown evidence of monthly PPE monitoring in all operational activities.

- Based on interviews with employees in Balimbingan Estate (harvesters and sprayers) said that the replacement of PPE is done once a year and there is no replacement of damaged PPE, told that the current safety shoes used procured by themselves)
- During field observations to mill, for example to scheduled waste storage and chemical warehouses, known that PPE of safety shoes was damaged (shoe soles have run out / thin) and interviews with mill employees such as lorry pullers say that they do not understand the mechanism of damaged PPE replacement (the hand gloves used when working is self-procuring). Its became **Non-conformity No: 2019.05**.

Regarding this, the company has not been able to show evidence that the company's mechanisms and policies have been implemented and monitored its effectiveness.

4.7.4

The both units have identified and determined the officers responsible for implementing and monitoring OHS, stipulated in the P2K3 structure that has been approved by the North Sumatra Provincial Manpower Office, namely:

- Balimbingan: KEP. 120-7 / DTK / SU / 2018 dated 29 June 2018, P2K3 secretary certificate as general OHS expert on behalf of Joki Lesmana no.reg.60177 / PK3 / AJ / 12/2018 / P0 dates issued Oct. 12, 2018.
- Dolok Sinumbah: KEP. 120-7 / DTK / SU / 2018 dated 29 June 2018.
- The P2K3 secretary on behalf of M Pardoni has been an OHS general expert with a license no.: reg.4406 / PK3 / AJ / 12/2018 / P2 dated April 16, 2018.

P2K3 meetings to discuss OSH issues have been carried out routinely every month, the things being discussed include the OSH programs, OSH training, results of workplace inspections and workplace accidents cases. Quarterly P2K3 reports have been sent to the relevant agencies.

4.7.5

The company has an emergency handling procedure, namely SOP No.: 4.3.17, date of issue June 1, 2015, the type of emergency described in the SOP is fire, natural disasters and riots.

The procedure for handling work accidents is explained in the SOP no.: 4.3.16 valid date June 1, 2015, explained the types of accidents include: first aid injury, moderate injury, serious injury, fatality and near misses. The handling procedure starts from handling near misses, reporting, investigating the cause of the accident

Balimbingan and Dolok Sinumbah Estate has determined officers who are responsible for first aid, namely the foreman in estate and mill. Sighted a list of first aid officers' names assigned at work in both estate.

Regular training for officers has been conducted, for example training in Balimbingan on March 14, 2019 to 26 first aider and March 11, 2019 in Dolok Sinumbah to 34 participants.

During field observations, auditors observe first aid kits at work, first aid equipment refers to the applicable national regulations, which are 21 items.

On ST-2, there are minor nonconformities related to preparedness of emergency response equipment (non-pressurized fire extinguishers in oil warehouse). Based on the auditor's verification on ASA 1, it was seen that Dolok Sinumbah and Balimbingan had routinely monitored fire extinguishers and first aid kit in monthly basis, however during field visit auditors observed:

- Fire extinguishers not sealed and not pressurized at scheduled waste storage in mill, WWTP' engine rooms, mill workshop and in fertilizer storage of Dolok Sinumbah Div 3.
- Based on field observations in Dolok Sinumbah Estate, namely harvesting activities in Afd III, scheduled waste and fuel tank, and as well as in spraying activities of Balimbingan, observed that first aid kit is incomplete (less than 21 items).

In this regard, the company has not been able to show evidence that monitoring has been carried out and evaluated effectively.

In addition, through interviews with the spray activity foreman in Balimbingan and the harvest foreman in Dolok Sinumbah ADF III, the auditor verified that the officer could not explain the stages of first aid. Related to this, the two business units

have not been able to show evidence that first aid training has been carried out effectively. **Auditors conclude that the NCR No. 2017.17 Minor raised to Major**

4.7.6, 4.7.7

The company has registered its employees in insurance program (PT BPJS TK). The validity evidenced by monthly dues payment, sighted the payment of both units, for example for Feb 2019, payments are made simultaneously for all PTPN IV employees by Medan head office on March 15, 2019, through the Mandiri branch of Medan. This was also verified by the auditor through interviews with sampled employees in both units.

The company can show the document of health insurance (BPJS Kesehatan) dues payment for all PTPN IV employees and their dependents, for example for the payment of the Feb 2019 period paid directly to the BPJS on March 15, 2019.

BPJS TK payment of contractor' workers were observed during audit, for example for contractor of FFB transport (CV Domasi), for the period of March 2019 has paid for 12 employees on March 22, 2019 through Pematang Siantar branch office.

Work accidents are recording per accident and recapitulated monthly and yearly. Observed the recapitulation of work accidents for the period of Jan - Feb 2019, there were 3 cases of accidents in Balimbangan estate (total lost time by 9 days), accident investigations have been conducted 1x24 hours, for e.g. accident on Feb. 12, 2019 (harvester). All accident has been reported to PT BPJS (insurance company), claims for employees are carried out by the company' hospital, no charge for employees during treatment.

Based on the work accident monitoring report in the LTA document for the period of Jan-Mar 2019, there were no accidents during that period.

In addition, the both units have monitored the occupational illness through health examination, carried out for workers exposed to chemicals (CHE), dust (Spiro) and noise (audiometry). There is no indication of exposure to chemicals, dust and noise from the results of latest examination.

4.7.2	Status: Non-conformity No.2019.04 with major category	
4.7.3	Status: Non-conformity No.2019.05 with major category	
4.7.5	Status: Non-conformity No.2017.17 from minor category raised to major category	

4.8
All staff, workers, smallholders and contractors are appropriately trained.

4.8.1; 4.8.2

CH showed a training program document in 2018. The document contained information about the tasks / types of training, training objectives, positions in the company, estimated implementation schedule, realization of implementation. The training activities include:

- Handling pesticides training
- Ganoderma handling training
- Training on HCV management and monitoring
- Certification training for class 1 Boiler officers
- Training on electronic manifest & online hazardous waste reporting
- Laboratory ISO training
- Training on the preparation of the RKL-RPL Document
- Training to refresh General OHS expert
- Integrated pest control training
- Harvesting training
- Etc.

CH has also carried out the realization of the program and has been well documented such as:

- The list of participants in the training for handling pesticides for batch I on October 2, 2018 attended by 54 workers.
- The list of participants in the training for ganoderma on May 7-9 2018 was attended by 11 participants.

- Records of training in the form of HCV Management and Monitoring Training certificate no. Cert 08-KEI-NKT-18 from 9 - 11 April 2018.
- Training Minutes / Socialization of Pest on 30 - 31 January 2018 attended by 10 participants.
- Training on harvesting on March 9, 2019 was attended by 36 participants.
- Etc.

Based on interview with spraying workers and harvesting worker they can explaining about job description, responsibilities and has trained by company. The results of interviews with contractors were conveyed that the contractor had been given training / socialization, for example the use of PPE when working.

Status: Comply

PRINCIPLE #5 Environmental responsibility and conservation of natural resources and biodiversity

5.1

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

5.1.1.

Dolok Sinumbah Estate & Mill.

The company shows the document of Environmental Evaluation of PTPN IV Dolok Sinumbah Business Unit for Estate & Mill units in accordance with the Decree of the Head of the Environmental Service Office of Simalungun Regency number 188.45 / 556 / 10.2 / 2018 effective from April 18th, 2018. Legalized by the Regent of Simalungun, Head of the Simalungun District Environmental Management Office. The total area of the land is 4,211.89 ha with a capacity of 30 tons / FFB per hour. A public consultation was held on March 22nd, 2018.

Balimbingan Estate.

The company has an environmental document such as Evaluation Environmental document, based on the approval of environmental agency of Simalungun District Number. 188.45/12.2/SEKRT-2014 January 20 2014 for scope area ± 3,981.94 hectare. Based on interview with relevant agency, the environment document still valid and used as reference in environment management.

5.1.2

The company shows the Semester II *RKL / RPL* report in 2018 Balimbingan Estate but there are still 3 parameters that have not been monitored such as employment opportunities & business opportunities, community perceptions and community facility improvements. In addition, the report has not shown the attachment of the evidence of the monitoring results such as surface water test, surface flow discharge, questionnaire evidence to the public and others. Based on this explanation, the **Non-conformity No. 2018.03 in Balimbingan Estate is not closed and raised to Major.**

5.1.3

CH shows water biota testing conducted on July 12th, 2018 by Laboratory accredited (KAN LP 001 IDN) with the following results:

Parameter	Location			Unit	Abundance relative
	50 meter after POME point (Dosin Estate)	50 meter before POME point	POME Point		
Benthos	57	57	143	Individuals number/liter	100
Plankton	1000	600	3600	Individuals number/liter	100

The Company has shown the implementation of *RKL / RPL* Semester II in 2018 which refers to Environmental Evaluation Document in accordance with number 188.45 / 556 / 10.2 / 2018. The monitored impacts include: air quality testing every 6 months, noise testing, ground water testing, liquid waste testing, aquatic biota testing, socio-economic, socio-culture and public health.

Based on explanation above, it is known parameter of BOD₅ (Testing on December 8th 2018) in Upstream and downstream Bah Balon dan Tongguran River is not accordance with Class II government regulation Number 82 year 2001. for example 3.82 mg/l (Upstream Bah Bolon) and 3.88 mg/l (Downstream Bah Bolon); 3.02 mg/l (Upstream Bah Tongguran) and 3.28 mg/l (Downstream Bah Tongguran). Beside that, in the evaluation was not explained the causes of BOD₅. Because that this **Non-conformity No. 2018.04 in Balimbingan Estate is not closed and raised to Major.**

5.1.2 Status: Non-conformity No. 2018.03 with Minor raised to Major

5.1.3 Status: Non-conformity No. 2018.04 with Minor raised to Major

5.2

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

5.2.1.

Dolok Sinumbah Estate.

The company has identified HCV and RTE species on 2011. The identification was done by Citra Cendekia which is lead assessor is registered as RSPO approved assessor. The result was reviewed by Lingkar Komunitas Sawit (LINKS). Publik consultation has been done October, 3 2011 attended by 80 people from government agency, workers and communities around the operational. The identified HCV area are HCV 1.1; HCV 4.1 and HCV 6. Total of the business unit-managed HCV area is 331.09 Ha consist of HCV 1&4 in the form of riparian of water springs and river with total area of 328 Ha and HCV 6 in the form of graveyard with total area is 3.09 Ha .

Balimbingan Estate.

The company has the HCV identification documents created in November 2016 by cooperation *PTPN IV Balimbinga Estate, PT Surveyor Indonesia*. Based on these documents, identified 3 species are protected under IUCN and there are no protected flora. The total area identified as HCV area covering 88.48 hectare.

5.2.2.

The company shows monitoring wildlife for 2018 period with details:

- 20 aves species with LC status and 1 type of appendix II (Eagle / *Spilornis cheela bido*).
- 7 mammal species, 4 types of Appendix II categories (*Macaca fascicularis*, *Cynolgale benneti*, *Macaca nemestrana*, and *Hystrix bancana*) and 2 with endangered status (*Cynolgale benneti* & *Hystrix bancana*); 1 type of vulnerable (*Macaca nemestrana*) and 1 LC (*Tupaja javanica*) and 6 types of reptilian consists of 4 categories of LC (*Ophiophagus Hannah*; *Varanus salvator*; *Naja sp* & *Amyda cartilaginea*).

The company shows the management and monitoring plan for the HCV area on March 5th, 2019 which informs HCV types, location, management actions, monitored indicators, monitoring objectives, benchmarks, methods, period and person in charge. Management carried out for example installing boards and tree planting carried out every once in 6 months.

5.2.3.

The Company has shown a Circular with DOS / SE.Int / 03 / I / 2018 number dated January 3rd, 2018 concerning protection of rare protected wildlife and plants which pursuant to Law No.5 of 1990 concerning Conservation of natural resources and biodiversity and Ecosystem, Law No.23 year 1997, Law 41 of 1999 concerning forestry and others. Delivered that all Afdeling / parts

1. It is not permissible to catch, maintain, sell and buy rare and protected wildlife.
2. It is not permissible to damage, cut down rare / protected plants / trees.
3. Criminal sanctions for people who intentionally violate provisions with a maximum of 5 years in criminal terms and a fine of IDR 100,000,000 in accordance with article 40 paragraph 2 of Law No. 5 of 1990.

In addition, socialization of wildlife protection is available on June 30th, 2018. Based on interviews with residents of Afdeling 3 housing are known they have been socialized regarding the prohibition of hunting and maintaining wildlife. Based on the explanation above, This **Nonconformity no. 2017.22 with Minor category** has been **fulfilled**.

5.2.4.

Dolok Sinumbah Unit has shown wildlife monitoring documents every 6 months, carried out in March 2019 in the HCV area, it is known that species have been classified based on IUCN, CITES & government regulations for example: 25 types of Aves Least concern (LC); 2 types of reptile Least concern (LC); 10 types of mammals; 2 types of Aves and 5 types of Reptiles including the CITES category Appendix II. Based on the explanation above this **Nonconformity no. 2017.23 with minor category** has been fulfilled.

5.2.5.

The results of field observations in the HCV area were located in the Bah Kasindir River Block 97A Afd IV, its known there were no areas that overlapped with the surrounding village community area.

Status: Comply

5.3

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

5.3.1.

The company shows the identification of estate waste sources and Mill which informs the name of the waste, the type / characteristics of the waste, the source of waste, & management procedures such as organic domestic, Hazardous waste, rags, POME, fiber, shell, dust, EFB and others.

The Company show that management of air pollution and GHG includes:

Emission source	Emission	Impact control
Workshop	CO2	Schedule vehicle maintenance regularly and check.
Generator	CO, NO2, NH3 & SO2	Schedule generator maintenance periodically and check.
Incinerators	CO, NO2, NH3 & SO2	Conducting empty bunches applications as fertilizer for Palm Oil.
Fertilizer store	NO2	Fertilizer packaging checks and housekeeping programs.
FFB transport vehicle	Dust	Fertilizer packaging checks and housekeeping programs.
Land clearing	CO2	Land opening with zero burning
Fertilizer	CO2	Use of fertilizers according to procedures.
Chemical activities	NO2 & CH4	Use of chemicals in accordance with the procedure.

5.3.2.

Dosin Estate & Mill.

Hazardous waste storage from Dolok Sinumbah Mill in accordance with No: 188.45 / 855 / Sekrt-2016 dated May 4th, 2016 is valid for 5 years by the Environmental Agency of North Sumatra Province. The types permitted include used oil, used / dry used batteries, used cartridges, used filters, used light bulbs, used burlap, ex jerry cans of chemicals, plastic drums, and woven fabrics.

Balimbingan Estate.

The Balimbing Business Unit has obtained the Decree of the Head of the Environment Agency No. 188.45 / 156 / Sekret-2016 dated March 8th, 2016 concerning Permit for Storage of Hazardous and Toxic Material PTPN IV (Persero) - Balimbingan Business Unit, Tanah Jawa Subdistrict, Simalungun Regency. Hazardous waste storgae Permit is valid for 5 years from the date of stipulation.

Dosin Estate & Mill.

The company shows evidence of the submission on February 26th, 2019 to PT Jagar Prima Nusantara with details:

Types	Manifest number	Amount (kg)	Vehicle number
Used fertilizer sack	WY 0003020	107.5	BP 9149
Ex lubricant drum	WY 0003023	289	BP 9149
Ex cummins filter	WY 000323	22	
Used jerry cans	WY 0003023	144	BP 9149
Used chemical cans	WY 0003023	15	BP 9149
Used cans	WY 0003023	4	BP 9149
Used chemical bottles	WY 0003023	183	BP 9149
Used lights.	WY 0003024	16	BP 9149

Used batteries	WY 0003022	12	BP 9149
Used van belts	WY 000323	20	

Note: WY 0003022 is included in the type of contaminated packaging (1 number of manifest).

The company shows an agreement letter between PTPN IV MEDAN and PT Jagar Prima Nusantara regarding the transportation and collection of hazardous waste with number 04.05 / S.Perj / 21 / VIII / 2018 dated August 8th, 2018. This agreement is valid until August 6th, 2019. Permit for transportation SK.736 /AJ.309/DJDP/2018/210050121BB and permission to collect SK. 233 / Menlk / Setjen / PLB. 3/4/2016.

Balimbingan Estate.

The company shows the minutes of submission of hazardous waste on February 14th, 2019 by PT Jagar Prima Nusantara, including:

- Contaminated packaging of 132 kg (manifest number WY 0003012).
- Used rags of 521 kg (manifest number WY 0003011).

5.3.3.

The observation results at Afdeling III Housing are known that domestic waste is thrown behind the housing area. In addition, the location of final waste disposal is less than 1 Kilometer and organic & inorganic waste is combined in the final landfill. Based on interviews with housing residents there is no garbage box/ cans so that workers make their own garbage holes and dry waste if they are full they will be burned.

During the ASA-1 audit, the Company has a domestic waste management SOP no : SPO-20 dated Jan 2nd, 2018 which explains that domestic waste management is carried out by separating organic and inorganic, taken by officers and taken to the landfill. There is an SOP for hazardous waste management in document no : SPO 02 dated January 2nd, 2017 stating that all used chemical and contaminated packaging is hazardous waste type and is managed in accordance with applicable hazardous waste management regulations. The results of field observations are known that:

1. Domestic waste is disposed of around the WWTP; beside & behind hazardous waste storage, behind Dosin office, around the palm oil plantation bordering the Malangis Village community.
2. Drum Lubricant Packaging (Rinse home for chemical activities Afdeling 3 Dosin) when the audit has not been managed and placed at hazardous waste storage.
3. The flow of leachate water in the Dolok Sinumbah Mill, flows into the ditch drainage that leads to the Bah Tongguran river.

Based on the explanation above, the company has not managed waste in accordance with applicable procedures. **Non-conformity No. 2017.25 with minor category has not fulfilled and raised to major.**

5.3.3	Status: Non-conformity No. 2017.25 with Minor raised to Major	
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5.4 Efficiency of fossil fuel use and the use of renewable energy is optimised.

5.4.1.

The company shows average FFB data for the January - December 2018 such as 12,144.37 tons of FFB; the average production of shells is 800.29 tons; ; the average production of fiber is 1,723.70 tons; the efficiency of using shells is 0.06615 tons / ton FFB; fiber use efficiency of 0.14248 tons / ton FFB.

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

5.5.1 & 5.5.2.

Procedure Standard (SPO) July 2007 Oil Palm Plant SPO 02 document. The replanting method is carried out, namely the land clearing method, the zero burning method and the under planting method. The company shows CLA with a replanting contractor with number 04.04 / S.PERJ / 019 / VII / 2018 dated July 16, 2018 for Division I in article 15 point (j) that the contractor must follow the rules, among others: environmental policy at PTPN IV; understand the principles of ISPO &

RSPO; Do not burn at work sites and others. Based on field observations in the Replanting area, it is known that land clearing is done manually or zero burning.

Status: Comply

5.6

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

5.6.1 & 5.6.2.

The Company show that management of air pollution and GHG includes:

Emission source	Emission	Impact control
Workshop	CO2	Schedule vehicle maintenance regularly and check.
Generator	CO, NO2, NH3 & SO2	Schedule generator maintenance periodically and check.
Incinerators	CO, NO2, NH3 & SO2	Conducting empty bunches applications as fertilizer for Palm Oil.
Fertilizer store	NO2	Fertilizer packaging checks and housekeeping programs.
FFB transport vehicle	Dust	Fertilizer packaging checks and housekeeping programs.
Land clearing	CO2	Land opening with zero burning
Fertilizer	CO2	Use of fertilizers according to procedures.
Chemical activities	NO2 & CH4	Use of chemicals in accordance with the procedure.

5.6.3.

The company shows Palm GHG calculations using version 3.0.1 for Dolok Sinumbah Mill period with details:

Summary of Net GHG Emissions.

Emissions per Product	tCO2e/product
CPO	1.45
PK	1.45

Production	t/yr
FFB processed	140125.58
CPO Produced	15807.14

Extraction	%
OER	11.28
KER	1.85

Land use	ha
OP Planted area	7812.17
OP planted on peat	0
Conservation (forested)	0
Conservation (Non-forested)	88.48
Total	

Summary of field emissions and sinks

	Own Crop			Group		3 rd Party	
	tCO2e	tCO2e/ha	tCO2e/t FFB	tCO2e	tCO2e/ha	tCO2e	tCO2e/ha
Emissions							
Land conversion	73135.45	9.36	0.52	0	0	0	0
*CO2 Emissions fertiliser	4073.96	0.52	0.03	0	0	0	0
**N2O Emissions	3398.37	0.44	0.02	0	0	0	0
Fuel Consumption	354.38	0.05	0	0	0	0	0
Peat Oxidation	0	0	0	0	0	0	0
Sinks				0	0	0	0
Crop sequestration	-73135.45	-9.36	-0.52	0	0	0	0

Conservation Sequestration	0	0	0	0	0	0	0
Total	7826.710	1	0.06	0	0	0	0

Summary of Mill Emissions and Credits

	tCO ₂ e	tCO ₂ e/tFFB
Emissions		
POME	16267.35	0.12
Fuel consumption	244.74	0
Grid electricity	2297.79	0.02
Utilization		
Credits		
Export of grid electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	18809.88	0.13

Palm oil Mill Effluent (POME) Treatment

Divert to compost	0 %
Divert to anaerobic digestion	100 %

POME Diverted to Anaerobic Digestion

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

Noise.

The company shows noise intensity testing conducted on August 24th, 2018 by the Medan Occupational Health & Safety Center with the following results:

Balimbingan Estate.

Measurement location	The results (dBa).	Threshold based on Decision of Environment Minister Number 48 year 1996
General Workshop	61.9	85
Static gerinda	86.5	
Cutting machine	78.2	
Technical office	64	
Yamamoto brand tripe machine	85	
Material Store	63	
Oil Store	54.4	
Warehouse office	52.9	
Fertilizer office	47.5	
Administration office	65.2	

Air noise testing is carried out by the Testing Laboratory of the Medan Industrial Research and Standardization Center accredited by KAN LP 621 IDN conducted on November 21st, 2018 with the results:

Parameter	Testing results			Unit
	The office front	Press station	Guest house	
Noise	56.1	78.5	57.9	DbA
Threshold	70	85	70	DbA

Based on that the testing results is not exceed the threshold decision of Environment Minister Number 48 year 1996.

Status: Comply

PRINCIPLE #6 Responsible consideration of employees and of individuals and communities affected by growers and mills

6.1

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

6.1.1, 6.1.2

The Social Impact Assessment for the unit of Balimbingan was carried out by PT Surveyor Indonesia on December 2015 to February 2016.

The SIA assessment of Dolok Sinumbah carried out by CV Citra Cendekia in 2011. The assessment method was conducted by guideline interview, random questionnaire, and field observation. In the aspect of assessment, it includes cultural, religious, religious, educational and community livelihood values. The document has also identified positive impacts and negative impacts caused by the company's operational activities.

In the SIA assessment report document for both units has includes records of participatory meetings with surrounding villages, for example:

1. The attendance list of public consultation in the Balimbing unit on November 16, 2016 which was attended by 18 participants consist of internal and external stakeholders.
2. The SIA questionnaire and list of stakeholder aspirations in the Dolok Sinumbah unit on October 3, 2011 and minutes of public consultation with the external stakeholders in Dolok Sinumbah.

Based on interviews with representatives of the surrounding community stated that the community had been involved in the SIA assessment.

6.1.3

Balimbing Unit and Dolok Sinumbah has set a program for social impacts management that are compiled every year, the preparation has been carried out in participatory way with the surrounding community. Sighted the questionnaires for the preparation of SIA programs as many as 15 correspondents in Balimbingan and 6 correspondents in Dolok Sinumbah. Sighted the program for the 2019, informs: the types of impacts, locations, management plans, schedule, indicators of program, results of program implementation and responsible persons.

Based on interviews with representatives of the community around the Balimbingan Unit, it was stated that there was an issue namely vends activities by the communities along the road around the company's area which was been orderlies by the company (social jealousy), however the issue was not included in the SIA management program 2019. In this regard, the company has not been able to show that all social issues and impacts have been identified, monitored and managed. **It became Non-conforminty No.: 2019.06**

Evidence of the implementation of social impact management has been verified by auditors, for example in the 2018 period, it can be shown, among others: the implementation of construction and maintenance of road and bridge facilities, recruitment of harvesters and loading workers, scholarship assistance to students in villages around the plantation.

6.1.4, 6.1.5

The Balimbingan Unit has reviewed the social impact management plan, the last review was conducted on January 2, 2018, for the program of the 2018 period, the results of the review have been included as input for the program preparation for the 2019 period. A review of the social management plan is carried out by Dolok Sinumbah Unit on the 25th of January 2018 (review of the 2017 plan). The results of the review have been used as input in the preparation of programs and plans for 2018. Both units do not have a smallholder scheme.

6.5.2 Status: Non Conformity No. 2019.06 with Major Category

6.2
There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.

6.2.1, 6.2.2
 Communication and consultation procedures with the stakeholders regulate in the SOP of communication and consultation number 03.02 dated 1 August 2012. Balimbing and Dolok Sinumbah unit has identified and listed the relevant stakeholders, updated on December 24, 2018, consist of: relevant agencies, regional government, SP BUN, Nagori, local contractors, and NGOs / press.

The PIC who is responsible for communication and consultation has been determined in both units, namely:
 In accordance with SK Decree No.: BAL / MU / KPTS / 01 / I / 2018 unit of Balimbing, the officer in charge is Deni Chandra Iskandar with 5 members.

According to decree Manager Unit of Dolok Sinumbah no.: DOS / M / Kpts / 01 / I / 2019 dated 4 Jan 2019, determined as many as 5 PIC who were responsible for handling and handling social problems.

6.2.3
 Unit of Balimbangan and Dolok Sinumbah can show records of recapitulation of internal and external response request, informing the date of letter submitted, section, letter number, response to the information needed and follow up actions taken. During 2018 the requests submitted to both unit were in the form of notification letters, invitations and requests for assistance. Responses and follow-up actions have been carried out by the company for each letter submitted. The units considered to evaluate the records to informing the parties who consulted, records of communication and consultation submitted orally, and as well as made clear which is that the outgoing and incoming letter. **OFI**

Status: Comply

6.3
There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.

6.3.1, 6.3.2
 Sighted an internal and external communication SOP and employee complaint handling, No. 19 (Revised 1) effective since 02 January 2015. Observed the customer and environmental (external) complaints handling SOP, No. 13 (Revised 1) effective since January 2, 2015 and as well SOP of communication and consultation with community No. SPO 03, revision 02, effective date January 02 2015.

In the SOP describes that the responsible for internally complaints is SP-Bun, the manager and for external is HR Assistant. Complaints Management System (Whistle Blowing System) of PTPN IV (PERSERO) 2013 article 10: Protection of Reporters are stated that company is protecting the whistle-blower.

Both units can show recapitulation of incoming and outgoing letters from internal and external stakeholders, based on the document review there are no internal / external complaints submitted to the company during the 2018/2019 period.

Based on interviews with community representatives and contractors, as well as interviews with employees it was found that there were no complaints submitted to the auditor.

Status: Comply

6.4
Any negotiations concerning compensation for loss of legal or customary rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.

6.4.1; 6.4.2 and 6.4.3
 The company is the nationalization of Dutch colonial companies, where the initial land acquisition process is not done through land rights compensation. Based on the information from the management, it is known that the company also does not have a short-term or long-term plan for new land expansion by compensating the land rights to other parties. So

the company does not have procedures related to land identification and compensation.

But to anticipate land conflicts, the company already has procedures to deal with land conflicts within SOP. SPO No. 04 dated 2 January 2015. Based on interviews with communities (Balimbingan Villages, Totap Majawa Villages, Tangga Batu Village, Marubun Jaya Village, Hatonduhan Sub-district, Tanah Jawa Sub-district, Dolok Sinumbah Village, Marihat Bandar Village and Timba'an Village), as well as Government Agency, it was stated that there was no significant land conflict in Mill and Estate operational area.

Status: Comply

6.5 Pay and conditions for employees and for employees of contractors always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.

6.5.1; 6.5.2

Minimum wage that applied in PTPN IV is based on Decree of Sumatera Utara Governor No 188.44/575/KPTS/2017 about minimum wage for Sumatera Utara Province of 2018. Follow up of this decree, management of PTPN IV issued circular letter No 04.11/SE/11/III/2018 about adjustment of basic wage and special allowances. Based on interview with labor union representative, it was known that there was an agreement between labor union and management of PTPN IV regarding minimum wage. Based on the result of interview with Labor Unions and workers at Dolok Sinumbah and Balimbingan, it was stated that for wage adjustments in 2019 will be included in April payroll.

CH showed wage documentation for estate and mill worker, for example mill worker (processing) and harvester, basic wage, overtime and pemium payment is paid in accordance with applicable regulation. Based on interview with labor union, worker in estate and mill, company has paid wages and overtime payment in accordance with applicable regulation. Giving salary slips to the workers (OFI)

Record of CLA socialization, for example :

- Balimbingan : Record of CLA year 2018-2019 socialization attended by 58 participants.
- Dolok Sinumbah : Socialization on July 26, 2018 for afdeling II was attended by 51 workers

The result of a field visit at afdeling 3 block 96BF Balimbingan estate, found 2 harvesters' wives assisting harvesting activities in the field without any work ties/agreement. In addition, the results of interview with 3 harvesters were conveyed that harvesters brought their wives to pick up loose fruit. Based on the explanation, it was concluded that there was not enough evidence that all workers had work agreement in accordance with Law 13 of 2003. **Non-conformity No. 2019.08.**

6.5.3 & 6.5.4

CH has provided facilities and infrastructure for the welfare of workers. The results of field observations and interviews with workers, known that the company has provided housing with decent conditions for workers. However, some workers did not live in the housing complex of estate because they already had private homes in the villages around the company. Source of clean water comes from springs or wells which are still sufficient even in dry conditions. There are also sports field facilities for employees, mosques and churches for places of worship. There are also *polikbun* as the first place of handling if there is a work accident and then referred to health facilities 1. All housing has also been equipped with electricity from PLN.

For educational facilities, there are kindergartens, elementary schools, junior high schools in the surrounding area of the company. For high school levels outside the company with a fairly close distance (30 minutes by vehicle). Interview with workers and labor union, said there was no complaints regarding workers' facilities.

The results of interviews with workers and residents of housing, said that there were traders who entered the residential area. There are also employees who sell food in the residential area. In addition, the results of interviews with workers stated that the location of Dolok Sinumbah and Balimbingan estate was close to the market so there were no difficulties in getting food with reasonable price.

6.5.2 Status: Non-conformity No. 2019.08 with Major Category

6.6
The employer respects the right of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.

6.6.1; 6.6.2
 The company showed policies related to labor union contained in the Human Rights policy number 07 revised number 00 effective date 2 January 2015 approved by management. The policy explained that the company respected the freedom of association. The policy is available in bahasa. As a form of freedom of association, labor union has been formed at PTPN IV and there is a chairman (representative) in each unit including Dolok Sinumbah and Balimbingan. Central SPBUN has also been registered in the relevant agency.

Based on the results of interview with workers in the estate and mill, it was stated that all employees were given the freedom to form a Labor Union. Currently all workers are registered as SP-Bun members.
 Ensure central SPBUN board selection mechanism (OFI)

The labor union conducted meeting periodically or where there is an issue with company or the member of labor union. There were meeting documentation, such as minutes of meeting on July 18, 2018 in Balimbingan related CLA socialization and records of labor union meetings on September 28 2018 in Dolok Sinumbah attended by 37 participants.

Status: Comply

6.7
Children are not employed or exploited.

6.7.1
 The company showed the Policy does not employ underage workers with policy number No. 03 No. revision 02 effective date 02nd January 2015 which is approved by the President Director of PTPN IV. The policy explains that the CH supports children's rights and seeks to implement them in the corporate environment, and is committed to implementing a policy of not employing underage children (18 years) under Law No. 20 of 1999 concerning ratification of the ILO convention concerning the minimum age to be allowed to work, Law No. 1 of 2000 concerning the approval of ILO conventions no. 182 concerning the prohibition and immediate action to eliminate the worst forms of child labor and Law No. 13 of 2004 concerning employment.

The results of the verification of the worker list document for the February 2019 period show that there were no workers under the age of 18. The workers in Balimbingan unit and Dolok Sinumbah are over 20 years old. The results of the interview with workers and labor union representatives stated that there were no workers under the age of 18 years.

The results of field observations such as in harvesting, spraying, warehouses and mill were not found workers under the age of 18 or child labor who helped work in the field.

Status: Comply

6.8
Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.

6.8.1; 6.8.2
 The company has a non-discrimination policy no. 04 Revision 02 dated January 2nd, 2015. The policy states that PTPN IV removes all forms of discriminatory practices of ethnicity, religion, race, gender, age, and disability in work, period and inter-group control in the entire business process of the company. The policy is available in bahasa. The company showed list of workers document in Balimbingan and Dolok Sinumbah estate level IA-IID on February 2019. Based on the document, known that workers come from various ethnic and cultural backgrounds, such as Javanese, Malay, Toba, Mandailing, Minangkabau, etc. From the list of workers it was also known that the majority of workers come from the area around the company.

The results of interview with labor union representatives, gender committees / women's empowerment and workers (estate

and mill) conveyed that there were no issues related to discrimination. The company has provided equal opportunities for workers. There are even several female foremen in the field, such as fertilizer foremen and maintenance foremen in the Dolok Sinumbah unit. The results of interviews with the villagers around were also conveyed that many workers from the surrounding villages working in the company.

6.8.3

Document verification and interview with unit management, labor union and gender committee, that the recruitment and promotion are done in accordance with the available procedure in the company. Implementation of recruitment and promotion based on examination results, discipline / attendance; job knowledge and expertise; speed, quality and productivity; teamwork; honesty, and sincerity. The company showed an example of employee recruitment documentation for 2017 recruitment and appointment in January 2019. The recruitment documentation has also been shown. The recruitment process takes a long time because the recruitment process involves all units in PTPN IV.

Status: Comply

6.9

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

6.9.1

The company has policy to prevent all forms of sexual harassment and violence contained in the Sexual Harassment Prevention Policy no. 06, revision 02, the effective date of January 02, 2015 that stated: PTPN IV is committed to providing opportunities for all employees to work which free from sexual harassment. The company already has a gender committee / women's empowerment section formed to handle with women's issues.

The results of interviews with management, gender committee / women's empowerment and verification of the document known that the company has a forum to handle with women's issues. The company also showed socialization related to handle women's issues, among others :

- Bahjambi : Minutes of socialization on handling women's issues in the Balimbingan estate on March 8, 2019 attended by 47 participants. The attendance list that is attached is February 18, 2019 with the agenda / topic of the social gathering IKBI.
- Dolok Sinumbah: Minutes of socialization on handling women's issues in Dolok Sinumbah estate on March 8, 2019 attended by 47 participants.

In the socialization minutes, the contents of the socialization points included the definition of sexual harassment, as well as prevention of sexual harassment, carried out by avoiding traveling at night and the code of conduct dressed neatly and behaving politely.

The results of interview with 1 female worker in Balimbingan warehouse and 5 female workers (road maintenance) at afdeling III Dolok Sinumbah estate, it was found that female workers did not know the reporting mechanism regarding women's issues such as sexual harassment or sexual violence. Based on the explanation above, it was concluded that there was not enough evidence that the company had socialized the reporting mechanism regarding women's issues through gender committees / women's empowerment. **Non-conformity No. 2019.09**

6.9.2

A Company policy on reproductive rights was documented in collective agreement chapter VI, which mentioned that female workers have the right free from work (leave) 3 months for giving birth and 2 days for menstrual. During interviews with female workers mentioned that they are aware to the policy. For example : Form menstruation leave for female worker namely Marinten from 15-16 March 2019 that was approved by HR assisstant.

6.9.3

The company has an internal complaints mechanism described in the PKB Chapter XI article 64 and 65 stated that the submission of complaints can be done through SPBUN and / or through direct superiors, settlement through bipartite and forwarded through an industrial court. while protection for whistleblower, contained in Whistle Blowing System document for PT Perkebunan Nusantara IV in 2013. Based on the results of interview with workers in the estate and mill, it was known that workers know the mechanism for submitting complaints. Complaints can be submitted to supervisor and

representatives of labor union.

6.9.1 Status: Non Conformity no. 2019.09 with Major Category.

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

6.10.1 and 6.10.2

The Company shows the description of FFB Price in the Estimated Purchase Price of FFB Third Party document which explains the price of CPO and PK, Operating costs, extraction of CPO and PK and price of FFB was calculated as follows:

- Extraction of Oil palm and Palm Oil Kernel
- The price of CPO X palm oil extraction (%)
- Price Palm Oil Kernel X palm Oil Kernel extraction (%)
- Total extraction of palm oil + palm oil kernel X processed Fruit

Dolok Sinumbah business unit determines the FFB purchase price with its own calculations which is made every day. The calculation is based on price of CPO & PK and Extraction of CPO & PK. Company show a price list specified in the Estimated Purchase Price of FFB Third Party document. For example, on May 24, 2018: IDR.1,630 and June 11, 2018: IDR. 1,540.

Based on a visit to the weighbridge, it is known that the price is informed by putting the prices prevailing on the day in the weighbridge office wall and is listed on the documentation of FFB payment to the third party.

6.10.3

Company shows FFB transaction agreement letter with five supplier, among other:

Name of supplier	No contact	Date of available	Date of finish
CV. Melati	DOS/SP/01/II/2018	6 January 2018	6 January 2019
CV. Rianalim	DOS/SP/02/III/2018	5 March 2018	5 March 2019

The contract describes the period, the quality of requirements, procedures for implementation, the transport system, term of the agreement, a weekly payments, settlement of disputes and the whole treaty signed by the Business Unit of Dolok Sinumbah and Supplier Party.

In addition, the company has an agreement with contractors for the service provision of operational activities, for example for FFB transport activities. Based on interview with the contractor of FFB transporter, it is known that the agreement has been made and agreed together.

6.10.4

Based on the Letter of Agreement, explained that payments are made every 1 week. The company shows Summary of FFB Revenue as the basis for FFB calculating payments. Recapitulation conducted for one week period, for example CV. Melati with a recapitulation of payments for the period from June 7 to 9, 2018 and was paid through by Mandiri bank on 18 July 2018.

Based on interview with the contractor of FFB transporter, the payments has been done in accordance with time in the agreement and until this there is no issues about payments.

Status: Comply

6.11 Growers and millers contribute to local sustainable development wherever appropriate.

6.11.1, 6.11.2

The unit of Balimbangan shows plan for partnership and community development programs for 2019, there are as many as 5 programs planned. There are as many as 6 CSR programs established by the Dolok Sinumbah unit for the 2019. The preparation has been based on communication with the surrounding community, through proposals submitted. The CSR implementation for the 2018 period has been verified by the auditor, the records can be shown, for example:

	<ul style="list-style-type: none"> • Assistance activities in the form of scholarships for elementary and high school students on July 26, 2018 as many as 16 people by the Balimbingan Unit. • Provision of assistance for the construction of houses of worship in Kasindir Dolok Marlawa Village by Balimbingan • Road hardening in Nagori Mancuk, has been realized on 19 July 2018. <p>There is no smallholder scheme under Dolok Sinumbah and Balimbingan Unit.</p>	
	Status: Comply	
6.12 No forms of forced or trafficked labour are used.		
<p>6.12.1; 6.12.2 & 6.12.3 Based on document verification of worker list , employment report, field observations, interviews with the labor union representatives, interviews with workers and the Manpower Agency, known that there were no foreign workers, child labor or forced labor. Workers in the company are permanent workers and workers who are still in probation / orientation who have work agreements or letters of appointment.</p>		
	Status: Comply	
6.13 Growers and millers respect human rights		
<p>6.13.1 CH has a policy on human rights (Policy No. 07, Revision 02, effective date January 02, 2015) which explains PTPN IV respects the human rights and dignity of all people, in accordance with applicable legal requirements. CH showed example of socialization of human rights policy on May 16, 2018 that was attended by 14 participants.</p> <p>The results of interview with the labor union representatives, workers (estate and mill), and contractors, said that the company had provided information/socialized on human rights policies. From the results of the interview, examples of human rights policies such as the granting of workers' rights such as wages, giving PPE, giving leave, the right to organize, etc. from the interview also revealed that there were no complaints or violations of human rights.</p>		
	Status: Comply	
PRINCIPLE #7 Responsible development of new plantings		
7.1 A comprehensive and participatory independent social and environmental assessment is undertaken prior to establishing new plantings or operations, or expanding existing ones, and the results incorporated into planning, management and operations.		
<p>7.1.1 – 7.1.3. Based on document review and interviews with representatives of management & the surrounding villages, it was found that there was no land clearing above 2005. Planting carried out in 2005-2016 was a replanting activity.</p>		
	Status: Comply	
7.2 Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.		
<p>7.2.1 and 7.2.2 The company has been operating since 1920 and until now in plantation operations have been replanted (replanting) but there is no new land development.</p>		
	Status: Comply	
7.3 New plantings since November 2005, have not replaced primary forest or any area required to maintain or enhance one or more High Conservation Values.		

7.3.1 – 7.3.5.

To ensure that there was not new plantings in primary forest or HCV area, the CB has communicated with RSPO compensation on November 2016 regarding to ensure Liability Disclosure and Land Use Change Analysis (LUCA). RSPO Compensation explained that the Dolok Sinumbah POM (supply base Dolok Sinumbah Estate) has been sent the disclosure and all the units are free from non-compliant land clearance. Based on documents review and interviews with heads of village, known that the company had been established from the era of Dutch Governance and there was no new land clearing activities from 2005 to the present.

Status: Comply

7.4

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

7.4.1 and 7.4.2

The company has been operating since 1920 and until now in plantation operations have been replanted (replanting) but there is no new land development.

Status: Comply

7.5

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

7.5.1

The company has been operating since 1920 and until now in plantation operations have been replanted (replanting) but there is no new land development.

Status: Comply

7.6

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

7.6.1; 7.6.2; 7.6.3; 7.6.4; 7.6.5; 7.6.6

The company has been operating since 1920 and until now in plantation operations have been replanted (replanting) but there is no new land development.

Status: Comply

7.7

Use of fire in the preparation of new plantings is avoided other than in specific situations, as identified in the ASEAN guidelines or other regional best practice.

7.7.1; 7.7.2

The company has been operating since 1920 and until now in plantation operations have been replanted (replanting) but there is no new land development.

Status: Comply

7.8

New plantation developments are designed to minimise net greenhouse gas emissions.

7.8.1 & 7.8.2

Based on the statement area data for the 2019 period, it was found that there were no land clearing above in 2015. Based on documents review and interviews with heads of village, known that the company had been established from the era of Dutch Governance and there was no new land clearing activities from 2005 to the present.

Status: Comply

PRINCIPLE #8 Commitment to continuous improvement in key areas of activity

8.1**Growers and millers regularly monitor and review their activities and develop and implement action plans that allow demonstrable continuous improvement in key operations.****8.1**Both units considered to adjust the implementation referring to the RSPO Generic P & C 2018 requirements. **OFI****Status: Comply**

3.2 Summary of Assessment Report of Supply Chain Requirement

3.2.1. General chain of custody requirements for the supply chain

Clause	Requirement
5.1	Applicability of the general chain of custody requirements for the supply chain
5.1.1	<p>The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. After the end product manufacturer, there is no further requirement for certification.</p> <p>Facility sold their palm product (CPO/PK) directly to the buyer from mill. CPO/PK transporter is hired by buyer according to the contract. General CoC has been applied to certified unit and third party which handle certified product.</p>
	Status: Comply
5.1.2	<p>Traders and distributors require a license obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model.</p> <p>CH only received certified FFB from own estates Dolok Sinumbah Estate and Balimbingan Estate. There are no certified product buying from traders.</p>
	Status: Comply
5.1.3	<p>Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform.</p> <p>The certificate holder has registered on RSPO IT platform with number RSPO_PO1000005868.</p>
	Status: Comply
5.1.4	<p>Processing aids do not need to be included within an organization's scope of certification.</p> <p>There are no processing aids on this audit scope.</p>
	Status: Comply
5.2	Supply chain model
5.2.1	<p>The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.</p> <p>The certificate holders only use Mass Balance (Module E) because mill still receive FFB from uncertified unit</p>
	Status: Comply
5.2.2	<p>The site can use one (1) or a combination of supply chain models as audited and certified by the CB.</p> <p>The certificate holder only used single supply chain models as Mass Balance Module (E).</p>
	Status: Comply
5.3	Documented procedures

5.3.1	
The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified.	
Facility has had procedure regarding to supply chain implementation in document Basic Guidance and Work Instruction of Certified Palm Oil Product Handling (document number 04.03/KS/SUS/P/001 approved since 1 August 2018). It procedure has covered the implementation of certified and non-certified handling, personnel in charge, book keeping and announce and confirm trades in the RSPO IT platform etc.	
Personnel in charge:	
<ul style="list-style-type: none"> • Field assistant managed certified FFB in estate. • Mill manager registered mill in RSPO IT platform and documented book keeping. • Weighbridge operator recapitulated amount of FFB received from certified/non-certified area. • Staff of planning and strategic department monitored a certification period and quota. 	
Based on document review, interview results and field visits, it is known that there is no CSPO / CSPK stamp in FFB weighbridge ticket. This is not in accordance with the Basic Guidance and Work Instruction of Certified Palm Oil Product Handling (document number 04.03/KS/SUS/P/001 approved since 1 August 2018) which explain every FFB weighbridge ticket must complete with CSPO / CSPK stamp. Based on the explanation this is become Non-conformity No. 2019.09 with major category .	
	Status: Non-conformity No. 2019.09 with major category
5.3.2	
The site shall have a written procedure to conduct annual internal audit	
In accordance with supply chain procedure, internal audit of supply chain conducted annually. Dolok Sinumbah POM has conducted internal audit supply chain on January 2019 which is found some NC's and the NC has been follow up by CH.	
	Status: Comply
5.4	Purchasing and goods in
5.4.1	
The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier	
There are no purchasing of RSPO Certified oil pam products on this scope certification.	
	Status: Comply
5.4.2	
The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents	
Facility has had an update procedures for handling non-conforming palm oil product in SOP of Information and Production Claim No. SPO 18. There are no purchasing of RSPO Certified oil pam products on this scope certification.	
	Status: Comply
5.5	Outsourcing activities
5.5.1	
In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mill cannot outsource processing activities like refining or crushing.	
Facility using third party for physical handling of palm product (CPO/PK) in form of transport. Dolok Sinumbah POM has confirmed that third parties are in line with RSPO SCC standard.	

	Status: Comply
5.5.2	Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following: <ul style="list-style-type: none"> a. The site has legal ownership of all input material to be included in outsourced processes; b. The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary. c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. d. d) The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance
	Dolak Sinumbah POM using third parties to transport RSPO certified products. In the agreement, it has been explained that the transport must fulfill all the requirements of the RSPO supply chain and are willing to be audited at any time by the certification body appointed by Dolok Sinumbah POM.
	Status: Comply
5.5.3	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.
	Document verification results and interviews with the management obtained information that there are contractors involved in the process of transporting RSPO Certified Product such as PT Wahana Adidaya Pertiwi, CV Pelita Jaya and CV Karya Mandiri.
	Status: Comply
5.5.4	The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products
	New contractor will verify in the next assessment.
	Status: Comply
5.6	Sales and goods out
5.6.1	The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form: The name and address of the buyer
	Certified product shipping documents have been completed with the seller's name and address; buyer's name and address; delivery date; date of document issued; product description including supply chain model; RSPO certificate quantity and number. For example, dispatch on 6 November 2018 from Dolok Sinumbah POM to PT Unilever Oleochemical Indonesia in Sei Mangkei, Besar Maligas Sub-district, Simalungun District, Sumatra Utara Indonesia transported by CV Pelita Jaya, 500,000 Kg of palm oil products with ALB standards max 5% (QUALITY-RSPO / 111).
	Shipping documents consist of DO, weighbridge ticket and receipt of commodity delivery. For weighbridge ticket and receipts for commodity delivery, a unique code in the form of a CSPO / CSPK stamp also informs the certificate number and SCCS model used.
	Status: Comply
5.7	Registration of transactions

<p>5.7.1</p> <p>Supply chain actors who:</p> <ul style="list-style-type: none"> • are mills, traders, crushers and refineries; and • take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable 	<p>The certificate holder has registered on RSPO IT platform with number RSPO_PO1000005868. All transaction has been register in palmtrace.</p>
	<p>Status: Comply</p>
<p>5.7.2</p> <p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:</p> <ul style="list-style-type: none"> • Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures. • Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually. • Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed. • Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements. 	<p>Dolok Sinumbah POM has registered all transaction of RSPO certified products that are claimed as certified products, delivery of RSPO certified products sent as non-certified and credit allocations in IT PalmTrace. Dolok Sinumbah POM has been shown sample of shipping announcement for RSPO certified product such as shipping announcement for CSPK with contract number 0048/KPBN/PKO-L/N-IV/X/2018 which confirmed by buyer on 24 January 2019.</p>
	<p>Status: Comply</p>
<p>5.8</p>	<p>Training</p>
<p>5.8.1</p> <p>The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff</p>	
	<p>The certification unit has annual RSPO Supply Chain Standards training, the latest training has been conducted dated 21 February 2019. This activity was followed by the weighbridge operator, production clerk, delivery clerk, processing assistant and mill manager.</p>
	<p>Status: Comply</p>
<p>5.8.2</p> <p>Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed</p>	
	<p>The certification unit has annual RSPO Supply Chain Standards training, the latest training has been conducted dated 21 February 2019. This activity was followed by the weighbridge operator, production clerk, delivery clerk, processing assistant and mill manager.</p> <p>Based on interviews with weighbridge operator, production clerk and manager, it is known that key persons in SCCS activities have understood the procedures and can demonstrate how documented FFB, CPO, PK are certified and not certified.</p>

	Status: Comply																
5.9	Record keeping																
5.9.1																	
The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements																	
Dolok Sinumbah POM has record production and delivery of RSPO certified products for the period April 2018 to March 2019. Based on these records it is known: <ul style="list-style-type: none"> • Production of Dolok Sinumbah Certified FFB for April 2018 is calculated from 1 April 2018, while Dolok Sinumbah Estate get RSPO certificates on 3 April 2018. • Production of Balimbingan certified FFB is calculated from 1 April 2018, while the Balimbingan Estate receives RSPO certificates on 5 June 2018. • Production of FFB from Dolok Sinumbah Estate (Block 09B) has not been calculated as RSPO non-certified products. • In July 2018 and January 2019 there were receipts of FFB from estate that had not yet received RSPO certificates, but in the recordings there was no production of certified products (CPO and PK). 																	
Based on the evidence, the recordings shown are not accurate and complete. This is become Non-conformity No. 2019.10 with major category.																	
	Status: Non-conformity No. 2019.10 with major category																
5.9.2																	
Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock																	
The certificate holder has CPO and PK Certified handling procedure, the retention time for document of traceability document is 2 year. CH can show sample document since the first date of certified.																	
	Status: Comply																
5.9.3																	
The organization shall be able to provide the estimate volume of palm oil / palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.																	
Facility estimated their palm product which is written in annex of certificate and monitored in three-monthly bases. If any overproduction, facility will inform the CB to extend their volume.																	
	<table border="1"> <thead> <tr> <th>Product</th> <th>The projection certified volume 3 April 2018 – 31 March 2019 (MT)</th> <th>Actual Production April 2018 –March 2019 (MT)</th> <th>The projection certified volume 3 April 2019 – 31 March 2020 (MT)</th> </tr> </thead> <tbody> <tr> <td>FFB</td> <td>150,768</td> <td>104,141.456</td> <td>120,091</td> </tr> <tr> <td>CPO</td> <td>41,177</td> <td>26,741.186</td> <td>28,822</td> </tr> <tr> <td>PK</td> <td>5,594</td> <td>4,033.545</td> <td>4,804</td> </tr> </tbody> </table>	Product	The projection certified volume 3 April 2018 – 31 March 2019 (MT)	Actual Production April 2018 –March 2019 (MT)	The projection certified volume 3 April 2019 – 31 March 2020 (MT)	FFB	150,768	104,141.456	120,091	CPO	41,177	26,741.186	28,822	PK	5,594	4,033.545	4,804
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FFB	150,768	104,141.456	120,091														
CPO	41,177	26,741.186	28,822														
PK	5,594	4,033.545	4,804														
	Status: Comply																
5.10	Conversion factors																
5.10.1																	
Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org); RSPO Rules for Physical Transition of Oleochemicals and its Derivatives. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries																	

Facility did not using conversion rate.	
	Status: Comply
5.10.2 Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	
Facility did not using conversion rate.	
	Status: Comply
5.11	Claims
5.11.1 The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.	
There is no RSPO trademark using on this audit scope.	
	Status: Comply
5.12	Complaints
5.12.1 The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	
The certificate holder has procedure about customer feedback/complaint and survey Number SPO 19 on 6 November 2018.	
<ul style="list-style-type: none"> - Customer complaint is complaint from customer which submit to the company, if any product non comply with standard. - The complaint can be submit by letter, memo and suggestion box. - The Manager will issued correction and corrective action to the officer concerned. 	
	Status: Comply
5.13	Management review
5.13.1 The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken	
Dolok Sinumbah Estate / Mill has a mechanism for conducting SCCS management review meetings which are effective from 18 February 2019. Based on this mechanism it is known that management review meetings are conducted at least once a year discussing internal audit results, customer and related party feedback, process performance and product conformity in achieving quality objectives; status of corrective and preventive actions against internal audit results; follow-up to previous management review meetings; changes that can affect the quantity and quality of the products produced; achievement of goals and objectives (quantity and quality of products).	
	Status: Comply
5.13.2 The input to management review shall include information on:	
<ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard. • Customer feedback. • Status of preventive and corrective actions. • Follow-up actions from management reviews. • Changes that could affect the management system. • Recommendations for improvement. 	
Management review meetings were held on February 27, 2019 which discussed the results of internal audits, customer and related party feedback, process performance and product suitability in achieving quality objectives; status of corrective and preventive actions against internal audit results; follow-up to previous management review meetings; changes that can affect	

<p>the quantity and quality of the products produced; achievement of goals and objectives (quantity and quality of products). This activity was attended by 24 people (Mill Manager, Head of Administration, Mill Assistant, Engineering, Estate Assistant, clerk and supervisor.</p>	
	<p>Status: Comply</p>
<p>5.13.3 The output from the management review shall include any decisions and actions related to:</p> <ul style="list-style-type: none"> • Improvement of the effectiveness of the management system and its processes. • Resource needs. 	
<p>Improvement of the effectiveness of the management system and its processes and resource needs is already included within the Management Review.</p>	
	<p>Status: Comply</p>

3.2.2. Module E – CPO Mills: Mass Balance Requirements

Clause	Requirement												
E.1	Definition												
E.1.1	<p>Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and sales volume of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p> <p>Dolok Sinumbah POM uses RSPO supply chain modules mass balance (E) because they still receive FFB from uncertified plantation which is a third party and uncertified estate.</p>												
	Status: Comply												
E.2	Explanation												
E.2.1	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the CB in the public summary of the P&C certification report. For an independent mill, the estimated tonnage of CPO and PK products must be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p> <p>Facility estimated their palm product which is written in annex of certificate and monitored in three-monthly bases. If any overproduction, facility will inform the CB to extend their volume.</p> <table border="1"> <thead> <tr> <th>Product</th> <th>Estimation of Certified Product (MT)</th> <th>Actual Production April 2018 – March 2019 (MT)</th> </tr> </thead> <tbody> <tr> <td>FFB</td> <td>150,768</td> <td>104,141.456</td> </tr> <tr> <td>CPO</td> <td>41,177</td> <td>26,741.186</td> </tr> <tr> <td>PK</td> <td>5,594</td> <td>4,033.545</td> </tr> </tbody> </table>	Product	Estimation of Certified Product (MT)	Actual Production April 2018 – March 2019 (MT)	FFB	150,768	104,141.456	CPO	41,177	26,741.186	PK	5,594	4,033.545
Product	Estimation of Certified Product (MT)	Actual Production April 2018 – March 2019 (MT)											
FFB	150,768	104,141.456											
CPO	41,177	26,741.186											
PK	5,594	4,033.545											
	Status: Comply												
E.2.2	<p>The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform).</p> <p>The certificate holder has registered on RSPO IT platform with number RSPO_PO1000005868. All transaction has been register in PalmTrace.</p>												
	Status: Comply												
E.3	Documented procedures												
E.3.1	<p>The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:</p> <ol style="list-style-type: none"> Complete and up to date procedures covering the implementation of all the elements in these requirements; The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site procedures for the implementation of this standard. <p>Facility has had procedure regarding to supply chain implementation in document Basic Guidance and Work Instruction of Certified Palm Oil Product Handling (document number 04.03/KS/SUS/P/001 approved since 1 August 2018). It procedure has covered the implementation of certified and non-certified handling, personnel in charge, book keeping and announce and</p>												

confirm trades in the RSPO IT platform etc.

Personnel in charge:

- Field assistant managed certified FFB in estate.
- Mill manager registered mill in RSPO IT platform and documented book keeping.
- Weighbridge operator recapitulated amount of FFB received from certified/non-certified area.
- Staff of planning and strategic department monitored a certification period and quota.

Based on procedure above, concluded that facility has had a complete and updated procedure regarding to supply chain implementation.

Status: Comply

E.3.2

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

Facility has had procedure regarding to supply chain implementation in document Basic Guidance and Work Instruction of Certified Palm Oil Product Handling (document number 04.03/KS/SUS/P/001 approved since 1 August 2018). This procedure is intended as a guide in handling certified FFB from the Estate to reception in Mill. FFB derived from their own plantation, one holding company and FFB of 3rd party certified by RSPO marked with stamps of CSPO (Certified Sustainable Palm Oil).

Dolok Sinumbah POM has been able to demonstrate the mechanism of separation of certified and non-certified products in the records model made starting from incoming FFB until processed FFB in the documents of monitoring monthly physical inventory of CPO and PK Certified which describe recording mechanism of the separation of certified and non-certified products, such as incoming FFB data, processed FFB data, CPO and Kernel production data, CPO and kernel extraction data.

Status: Comply

E.4 Purchasing and goods in

E.4.1

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

Certified and non-certified FFB received during certification period (3 April 2018 until March 2019)

Month	FFB Received (Kg)		
	RSPO Certified	Non Certified	Total
3 April 2018 to March 2019	105,086,150	27,982,584	133,068,734

Status: Comply

E.4.2

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

Based on the estimated FFB, CPO and PK on annex 1 of initial assessment certificate, facility could be produce as follows:

Product	Estimation of Certified Product (MT)	Extension Volume (MT)	Actual Production April 2018 until March 2019 (MT)
FFB	102,768	48,000	104,141.456
CPO	24,664	12,000	26,741.186
PK	4,111	900	4,033.545

Based on the data above, there was overproduction and CH has inform to CB.

Status: Comply

E.5 Record keeping

E.5.1

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

- b. All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.**
- c. The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a site is allowed to sell short. (i.e. product can be sold before it is in stock.)**

Mill has documented the record and balance of all RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. Based on certification period (3 April 2018 – 31 March 2019) found that summary of certified/noncertified product sold as follow:

Period	CPO Production (MT)		Total	Cert CPO Dispatch (MT)			Total
	Cert	Non Cert		RSPO	Other scheme	Non Cert	
April 2018 – 31 March 2019	26,741.19	6,559.71	33,300.9	1,500	-	15,094.98	16,094.98

Period	PK Production (MT)		Total	Cert PK Dispatch (MT)		Total
	Cert	Non Cert		RSPO	Non Cert	
April 2018 – 31 March 2019	4,033.55	1,081.95	5,115.50	2,888.89	-	2,888.89

Status: Comply

3.3 Conformity Checklist of Certificate and Trademark Use

1.	Evidence of permission or approval certificate and trademark from Certification Body which submitted by Client	X or√
ASA-1	Certificate holder (Dolok Sinumbah POM – PT. Perkebunan Nusantara IV) have a license/approval from Mutuagung Lestari as Certification Body regarding use of certification with No. MUTU-RSPO/111	
	Status: Comply	
2.	Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of trademark Use	X or√
ASA-1	Certificate holder (Dolok Sinumbah POM – PT. Perkebunan Nusantara IV) have a license/approval from Mutuagung Lestari as Certification Body regarding use of certification with No. MUTU-RSPO/111	
	Status: Comply	
3.	Implementation of Certificate and Trademark is not used on product	X or√
ASA-1	Certificate holder (Dolok Sinumbah POM – PT. Perkebunan Nusantara IV) have a license/approval from Mutuagung Lestari as Certification Body regarding use of certification with No. MUTU-RSPO/111	
	Status: Comply	
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.	X or√
ASA-1	Certificate holder (Dolok Sinumbah POM – PT. Perkebunan Nusantara IV) have a license/approval from Mutuagung Lestari as Certification Body regarding use of certification with No. MUTU-RSPO/111	
	Status: Comply	

3.4 Summary of RSPO Partial Certification.

Compliance of the uncertified management units of PT Perkebunan Nusantara (PTPN) IV against the rules for partial certification was determined through external assessment conducted by RSPO Accredited Certification Body in accordance with RSPO Certification System clause 4.2.4. A summary of findings is as stated below.

PT Perkebunan Nusantara (PTPN) IV Time Bound Plan (TBP) is explained in point 1.10. PT Perkebunan Nusantara (PTPN) IV run eighteen (18) mills and thirty two (32) estates in Indonesia and has been RSPO certified for six (6) mills and nine (9) supply bases in Indonesia. PT Perkebunan Nusantara (PTPN) IV has informed the TBP progress, MUTU has considered that PTPN IV is complied with the RSPO requirement for TBP. The Time Bound Plan was revised and declared by PTPN IV on March 2018.

MUTU has verified partial certification for un-certified unit's subsidiary of PTPN IV based on their Time Bound Plan. There is twelve (12) uncertified mills and twenty three (23) uncertified estates of PTPN IV, 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 follow RSPO requirement related to New Planting Procedure and Remediation and Compensation Procedure.
- There is no labour disputes that is not being resolved through an agreed process.
- All plantations established since 2005 have been done so in accordance with the applicable laws of the country and that there is no evidence of non-compliance with law in any of the non-certified holdings which has not been declared above.

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p>Yes and positive assurance is produced for these units.</p> <p>Auditor verification There are external audit that has been conducted for management units of Pasir Mandoge, Timur, PT Agro Sinergi Nusantara and PT Sinergi Perkebunan Nusantara</p> <p>And positive assurance is produced for these units.</p>
2.1.2	<p>No replacement after dates defined in Nis Criterion 7.3 of:</p> <ul style="list-style-type: none"> • Primary forest. • Any area identified as containing High Conservation Values (HCVs). • Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3. 	<p>PTPN IV has submitted liability disclosure to RSPO.</p> <p>Based on PTPN IV disclosure of liability there is one (1) estate that has liability</p> <p>PTPN IV has sent their liability disclosure to the RSPO Compensation Panel (rspocompensation@rspo.org) in 2016. PTPN IV has been update their liability disclosure and also sent LUCA on 2018. There is one (1) unit that has non-compliant land clearance.</p> <p>Auditor verification</p>

		Auditor has verified the supporting evidence of above the company statement. The above statement in accordance with the supporting evidence provided.
2.1.3	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>No new planting/land clearing after 1st January 2010. All planting in PTPN IV management units are old plantation that was planted before November 2005.</p> <p>Auditor verification PTPN IV has sent their liability disclosure and LUCA to the RSPO Compensation Panel (rspocompensation@rspo.org) in 2016. PTPN IV has been update their liability disclosure and also sent LUCA on 2018. There is one (1) unit that has non-compliant land clearance without HCV before 2010.</p>
2.1.4	Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	<p>There is no land conflicts.</p> <p>Auditor verification The company has SPO of conflict area management No.4 (revise 2) January 2, 2015 has explain that problem solving of conflict area is conducted by negotiation which involves leader of dispute area and determine the compensation done by negotiation until they reach agreement</p> <p>There is evidence of documented land dispute resolution for the uncertified units.</p>
2.1.5	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	<p>There is no labor disputes.</p> <p>Auditor verification There is no information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries.</p> <p>The company has a mechanism for dealing with complaints and dissatisfaction in the SOP of Internal Communication and Employee Grievance Handling (internal) (No. 19 (Revision 1) effective from January 2, 2015), SOP Handling Customer Complaints and Environment (external) (No. 13 (Revision 1) effective from January 2, 2015) and there are SOP of Communication and Public Consultation (No. SPO 03, revision 02, the effective date of January 2, 2015).</p> <p>The Company has a policy to protect the identity of the Whistle Blowing that stated in the documents of Infringement Complaint</p>

		Management System (Whistle Blowing System) PT Perkebunan Nusantara IV (Persero) on 2013 in Article 10: Protection For Reporter.
2.1.6	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	<p>Yes, there is no legal non-compliance is being processed.</p> <p>Auditor verification</p> <p>The company has a complete list of regulations in 1nd semester of 2016 that includes local regulations, national regulation and international regulation.</p> <p>The procedure explains that the person responsible for the management of legal documents are the Head of General Affairs and Human Resources. The company has kept a list of rules and regulations in 1nd semester of 2016 at the Head of General Affairs and Human Resources Department and has distributed to each division office in hardcopy and softcopy.</p>

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

3.5.1. Identification of Findings, Corrective Actions and Observations at previous assessment

BALIMBINGAN ESTATE

NCR No.	: 2018.01	Issued by	: Arif Faisal Simatupang
Date Issued	: 10 February 2018	Time Limit	: ASA-1
NC Grade	: Minor	Date of Closing	: 9 April 2018
Standard Ref. & Requirement	: 2.1.4 A system for tracking any changes in the law shall be available and implemented		
<i>Non-Conformance Description & Evidence observed :</i>			
<p>The management unit has not been able to prove the implementation related to the regulatory update system. Based on the review document of Regulations / Laws Regarding the Implementation of RSPO, it is known that not yet completely changes in the law are updated, among others not yet include:</p> <ul style="list-style-type: none"> - Regulation of soil and water conservation (UU No. 37 of 2014) - Regulation of Agrarian Ministerial No. 7 of 2017 related on procedures for determining land use title (HGU). - Regulation of Health Ministerial No. 416 of 1990 related on water quality requirements and supervision. 			
Root Cause Analysis :			
Officers negligence in updating the latest regulations related to the application of RSPO certification.			
Correction :			
Revise existing rules by incorporating the latest rules, among others regulation of soil and water conservation (UU No. 37 of 2014), regulation of Agrarian Ministerial No. 7 of 2017 related on procedures for determining land use title (HGU), regulation of Health Ministerial No. 416 of 1990 related on water quality requirements and supervision.			
<i>Corrective Action :</i>			
Create a Manager Memorandum for the assignment of the PIC responsible for updating the regulations related to the RSPO certification			
<i>Assessor Evaluation and Conclusion :</i>			
Verification of 9 April 2018 :			
Manager letter No. BAL/SE/Intern/III/2018 dated 1 March 2018, appointing Human Resources and General Assistant as well as PPD Officer as PIC of RSPO document update.			
<p>The Management Unit shows the List of Rules/Regulations Relating to the Implementation of RSPO, which includes:</p> <ul style="list-style-type: none"> - Regulation of soil and water conservation (UU No. 37 of 2014) - Regulation of Agrarian Ministerial No. 7 of 2017 related on procedures for determining land use title (HGU). - Regulation of Health Ministerial No. 416 of 1990 related on water quality requirements and supervision. 			
This non conformity has complied.			

Verified by	: Arif Faisal Simatupang
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NCR No.	: 2018.02	Issued by	: Arif Faisal Simatupang
Date Issued	: 10 February 2018	Time Limit	: 9 February 2019
NC Grade	: Major	Date of Closing	: 7 May 2018

Standard Ref. & Requirement	: 2.2.1 Documents showing legal ownership or lease, history of land tenure ownership/control, and the actual legal use of the land shall be available
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Non-Conformance Description & Evidence observed :

The description and utilization of Land Use Title of Balimbangan Business Unit (covering 3,981.94 ha) contained in Area Statement is still unclear, this is due to:

- In the Area Statement there are still land dispute of *Garapan Pondok Batu* (86.22 ha) and land dispute of *Garapan Jurangan* (90,80 ha) as the management area, while in Certificate No. 7 of 2008 (in the Annex of the Land Map), the claimed area has been excluded from the extension HGU/Certificate No. 7.
- Based on the Letter of Director of Human Resources and General Affairs (dated 22 October 2012) on the explanation of the area of HGU Balimbangan, it is known that the land dispute area of *Garapan Pandawa Lima* (104.96 ha) excluded in the calculation of managed area. While in the description of the Area Statement, the land dispute area of *Garapan Pandawa Lima* is included in the calculation of the managed area.

Root Cause Analysis :

There has been no officer for monitoring the update of changes to existing documents.

Correction :

- Remove the land dispute area of *Garapan Pondok Batu* and *Garapan Jurangan* from the description of Area Statement of Balimbangan.
- The land dispute area of *Garapan Pandawa Lima* is still inside the HGU area, *Garapan Pandawa Lima* will not be removed from the area statement and will be given information as the area that is still disputed.

Corrective Action :

- Make monitoring update to existing documents of Management Unit
- Establish the PIC for updating of existing documents of Management Unit

Assessor Evaluation and Conclusion :

Verification of 9 April 2018 :

- Manager letter No. BAL/SE/Intern/III/2018 dated 1 March 2018, appointing Human Resources and General Assistant as well as PPD Officer as PIC of RSPO document update.
- The Management Unit shows the Area Statement of January 2018 covering 3,806.98 ha. There is no land dispute of *Garapan Pondok Batu* and *Garapan Jurangan*, but there are still land dispute of *Garapan Pandawa Lima* covering 104.96 ha.

This non conformity has not been comply

Verification of 7 May 2018 :5

The management unit sent an update of area statement covering 3,806.98 ha and there was no land dispute of Garapan Pandawa Lima in it, but was renamed as Hiaten Area (the hiaten area is the reserve area due to ganoderma attack, ie the area removed from the existing block due to dead oil palm, so as not to decrease the productivity of existing plants statistically).

The management unit stated that when the old area statement was written a mistake in writing the description, where land dispute of Garapan Pandawa Lima should not be included in area statement.

This non conformity is comply

Verified by : **Arif Faisal Simatupang**

NCR No.	: 2018.03	Issued by	: Radytio Puspanjana
Date Issued	: 10 February 2018	Time Limit	: 1 July 2019
NC Grade	: Minor raised to Major	Date of Closing	: 26 May 2019
Standard Ref. & Requirement	: 5.1.2 Environment management plan document to prevent negative impacts, its implementation report and revision (if the identification of impact requires changes in current company's practices) shall be available. The company's management shall appoint the responsible person(s) for the implementation of the document.		
<i>Non-Conformance Description & Evidence observed (filled by auditor):</i>			
<p>Records of the implementation of environmental management are not in accordance with the management plan described in the Environmental Evaluation Document as well as guidelines for the preparation of environmental management and monitoring plan (RKL/RPL) implementation report (Environmental Ministerial Decree No. 45 of 2005). This is reflected in the environmental management and monitoring plan (RKL/RPL) Implementation Report for the semester II of 2017, which does not include the implementation of the environmental management plan (RKL), such as:</p> <ul style="list-style-type: none"> - Surface flow discharge - Soil erosion and Sedimentation - Decreased Soil fertility - Generation of Solid Waste - Generation of toxic and hazardous waste - Potential Land Fires - Road Damage - Impaired smoothness of traffic - Employment opportunities and business opportunities - The emergence of public perception - Improvement of community facilities - Decrease in public health 			
Root Cause Analysis :			
<p>The lack of understanding of the officers in arranging the environmental management and monitoring plan (RKL/RPL) documents in accordance with the Environmental Evaluation Document and the Environmental Ministerial Decree No. 45 of 2005.</p>			

Correction :

To revise environmental management and monitoring plan (RKL/RPL) documents semester II of 2017 by inserting implementation and environmental management plan (RKL) contained in Environmental Evaluation Document (DELH) and in accordance with Environmental Ministerial Decree No. 45 of 2005.

Corrective Action :

- Providing socialization of preparation of environmental management and monitoring plan (RKL/RPL) documents in accordance Environmental Evaluation Document (DELH) and the Environmental Ministerial Decree No. 45 of 2005.
- Establish the PIC responsible for preparing environmental management and monitoring plan (RKL/RPL) and reporting to Environmental Agency every 6 months

Assessor Evaluation and Conclusion (filled by auditor):**Verification 9 April 2018**

- The company shows evidence of socialization related to making RKL & RPL reports for Balimbingan Estate on 10 February 2018 involving 20 participants in the socialization consisting of managers, Administrative assistants, field assistants, Security, Warehouse Chief, clerk. The minutes of the activity are made by the HR Assistant and there is activity documentation in the form of photos.
- The Company shows the Decree of the Manager of Balimbingan Estate No.BAL / MU / Kpts / III / 2018 in March 2018 regarding the appointment of Assignments in the preparation of reports on the results of the implementation of the RKL-RPL for the Balimbingan Estate. In the Decree, it was explained that assigning names and positions of special officers (including job descriptions), evaluating monitoring, measuring, testing, compiling RKL & RPL reports according to SPO, special officers responsible to managers, Decree delivered to the personnel concerned. The assignment in preparing the RKL-RPL report was Chairman Deni Candra Iskandar, member of Aripin Pane, Amran, Darwin H Saragih.

But CH not yet shown the evidence of revision of the implementation report of RKL / RPL period II 2017 by loading / including the description of the implementation of environmental management, description of the implementation of environmental monitoring and evaluation consisting of trends evaluation, critical point evaluation, and compliance evaluation. **Non-conformity No. 2018.03 is open.**

Verification 7 May 2018

The company shows implementation report of the RKL / RPL for the first semester 2018. However, not all important impacts have been monitored, as required by the environmental document, for example the results of monitoring surface water have not been found on the Bah Tongguran river, Kasindir river, Bah Birung river according to appropriate environmental quality standards with PP No. 82 of 2001. **Non-conformity No. 2018.03 with Major Category is open.**

Verification 25 June 2018

The company shows revision implementation report of the RKL / RPL for the first semester 2018 which describes the implementation of monitoring management for the implementation period of first semester of 2018. However, it does not yet contain implementation of environmental management and Environmental Monitoring (RPL) as in the Environmental document 2013. **Non-conformity No. 2018.03 with Major Category is open.**

Verification 30 March 2019

The company shows the Semester II RKL / RPL implementation document for 2018 Balimbangan Estate but there are still 3 parameters that have not been monitored such as employment opportunities & business opportunities, community perceptions and community facility improvements. In addition, the report has not shown the attachment of evidence from the monitoring results such as the results of surface water tests, surface flow discharge, questionnaire evidence to the public and so forth. Based on this explanation, the non-conformity is stated to have not been fulfilled with the status of Minor raised to Major.

Verification 26 May 2019

The Company has shown the Revision Semester II RKL / RPL report in 2018 which has included the parameters that have been monitored, among others: Job opportunities and business opportunities, perceptions and attitudes of the community and improvement of community facilities through CSR program activities. In addition, evidence of monitoring results such as surface water test results, water flow discharge, questionnaire evidence to the public and so on have been attached.

Corrective action by giving information to the document controller of estate regarding the procedure for preparing the RKL / RPL report that was held on May 16, 2019. Based on the explanation for this non-conformity it was stated that it had been fulfilled.

Verified by : **Brigitta Prita**

NCR No.	: 2018.04	Issued by	: Radytio Puspanjana
Date Issued	: 10 February 2018	Time Limit	: 1 July 2019
NC Grade	: Minor raised to Major.	Date of Closing	: 26 May 2019
Standard Ref. & Requirement	: 5.1.3 Environment monitoring plan document, its implementation report, and the corrective plan (if non-conformance arised from the monitoring result) shall be available. This plan is reviewed on two-yearly basis		

Non-Conformance Description & Evidence observed :

Records of the implementation of environmental monitoring are not in accordance with the monitoring plan described in the Environmental Evaluation Document as well as guidelines for the preparation of environmental management and monitoring plan (RKL/RPL) implementation report (Environmental Ministerial Decree No. 45 of 2005). This is reflected in the environmental management and monitoring plan (RKL/RPL)Implementation Report for the semester II of 2017, which does not include the implementation of the environmental monitoring plan (RKL), such as:

- Surface flow discharge
- Soil erosion and Sedimentation
- Decreased Soil fertility
- Generation of Solid Waste
- Generation of toxic and hazardous waste
- Potential Land Fires
- Road Damage
- Impaired smoothness of traffic
- Employment opportunities and business opportunities
- The emergence of public perception
- Improvement of community facilities
- Decrease in public health

<p>Root Cause Analysis :</p> <p>The lack of understanding of the officers in arranging the environmental management and monitoring plan (RKL/RPL) documents in accordance with the Environmental Evaluation Document and the Environmental Ministerial Decree No. 45 of 2005.</p>
<p>Correction :</p> <p>To revise environmental management and monitoring plan (RKL/RPL) documents semester II of 2017 by inserting implementation and environmental monitoring plan (RPL) contained in Environmental Evaluation Document and in accordance with Environmental Ministerial Decree No. 45 of 2005.</p>
<p>Corrective Action :</p> <ul style="list-style-type: none"> - Providing socialization of preparation of environmental management and monitoring plan (RKL/RPL) documents in accordance Environmental Evaluation Document and the Environmental Ministerial Decree No. 45 of 2005. - Establish the PIC responsible for preparing environmental management and monitoring plan (RKL/RPL) and reporting to Environmental Agency every 6 months.
<p>Assessor Evaluation and Conclusion (filled by auditor):</p> <p>Verification 9 April 2018</p> <ul style="list-style-type: none"> • The company shows evidence of socialization related to making RKL & RPL reports for Balimbingan Estate on 10 February 2018 involving 20 participants in the socialization consisting of managers, Administrative assistants, field assistants, Security, Warehouse Chief, clerk. The minutes of the activity are made by the HR Assistant and there is activity documentation in the form of photos. • The Company shows the Decree of the Manager of Balimbingan Estate No.BAL / MU / Kpts / III / 2018 in March 2018 regarding the appointment of Assignments in the preparation of reports on the results of the implementation of the RKL-RPL for the Balimbingan Estate. In the Decree, it was explained that assigning names and positions of special officers (including job descriptions), evaluating monitoring, measuring, testing, compiling RKL & RPL reports according to SPO, special officers responsible to managers, Decree delivered to the personnel concerned. The assignment in preparing the RKL-RPL report was Chairman Deni Candra Iskandar, member of Aripin Pane, Amran, Darwin H Saragih. <p>But CH not yet shown the evidence of revision of the implementation report of RKL / RPL period II 2017 by loading / including the description of the implementation of environmental management, description of the implementation of environmental monitoring and evaluation consisting of trends evaluation, critical point evaluation, and compliance evaluation. Non-conformity No. 2018.03 is open.</p> <p>Verification 7 May 2018</p> <p>The company shows implementation report of the RKL / RPL for the first semester 2018. However, not all important impacts have been monitored, as required by the environmental document, for example the results of monitoring surface water have not been found on the Bah Tongguran river, Kasindir river, Bah Birung river according to appropriate environmental quality standards with PP No. 82 of 2001. Non-conformity No. 2018.03 with Major Category is open.</p> <p>Verification 25 June 2018</p> <p>The company shows revision implementation report of the RKL / RPL for the first semester 2018 which describes the</p>

implementation of monitoring management for the implementation period of first semester of 2018. However, it does not yet contain implementation of environmental management and Environmental Monitoring (RPL) as in the Environmental document 2013. **Non-conformity No. 2018.03 with Major Category is open.**

Verification 30 March 2019

The company shows the Semester II RKL / RPL implementation document for 2018 Balimbingan Estate but there are still 3 parameters that have not been monitored such as employment opportunities & business opportunities, community perceptions and community facility improvements. In addition, the report has not shown the attachment of evidence from the monitoring results such as the results of surface water tests, surface flow discharge, questionnaire evidence to the public and so forth. Based on this explanation, the non-conformity is stated to have not been fulfilled with the status of Minor raised to Major.

Verification 26 May 2019

The Company has shown the Revision Semester II RKL / RPL report in 2018 which has included the parameters that have been monitored, among others: Job opportunities and business opportunities, perceptions and attitudes of the community and improvement of community facilities through CSR program activities. In addition, evidence of monitoring results such as surface water test results, water flow discharge, questionnaire evidence to the public and so on have been attached.

Corrective action by giving information to the document controller of estate regarding the procedure for preparing the RKL / RPL report that was held on May 16, 2019. Based on the explanation for this non-conformity it was stated that it had been fulfilled.

Verified by : **Brigitta Prita**

NCR No.	: 2018.05	Issued by	: Radytio Puspanjana
Date Issued	: 10 February 2018	Time Limit	: 10 February 2019
NC Grade	: Major	Date of Closing	: 7 May 2018
Standard Ref. & Requirement	: 5.2.2 Where rare, threatened or endangered (RTE) species and or other HCVs are present or affected by the plantation and mill operations, an appropriate measures that are expected to maintain or enhance them shall be implemented through a management plan		
<i>Non-Conformance Description & Evidence observed :</i>			
Based on HCV Identification conducted in 2016 there are several species of fauna belonging to RTE according to IUCN, CITES and Government Regulation (PP) No. 7 of 2009, but the Management Unit has not been able to show the program and realization of monitoring of the RTE species.			
Root Cause Analysis :			
There is no PIC set up to make the program, realization and evaluation of monitoring of RTE species in Management Unit.			
Correction :			

Establish program and realization of monitoring of RTE species.

Corrective Action :

- Establish the PIC responsible for programming, implementation and evaluation of monitoring of RTE species
- Socialize the HCV management and monitoring plan (RTE species) to the workers
- Officers should also be trained / socialized about the preparation of the RTE species management and monitoring program and evaluate the implementation of the program

Assessor Evaluation and Conclusion :

Auditor Verification of 9 April 2018

- The Management Unit demonstrated program evaluation and monitoring of RTE species made in February 2018 prepared by PPD RSPO and known by Unit Managers, explaining the program to be evaluated, evaluation methods, evaluation objectives, indicators and evaluation results. For example, the presence of planted flora and fauna, field survey evaluation methods, evaluation targets of flora and fauna around the Estate, population indicator, and evaluation result of flora and fauna species are found still in accordance with initial identification.
- Management Unit shows evidence of socialization related to protected fauna located involving 50 participants of consisting of Manager, Assistant of Administration, plant assistant, security, Warehouse Chief, First Clerk and human resource Clerk, notes of activity are made by General HR Assistant and there is documentation of activities in the form of photos. The socialization material is about the distribution of HCV areas and protected wildlife species according to Government Regulation No. 5 of 1999.
- The management unit shows evidence of HCV socialization on 6 January 2018 involving 20 workers consisting of managers, administrative assistants, plant assistants, security, Warehouse Chief, krani I and human resources , the minutes of such activities are made by the General HR Assistant. The socialization material is about the type and identification of HCV.
- The Management Unit shows the Decree of Unit Manager (No.BAL/MU/Kpts/III/04/2018 in February 2018) regarding the appointment of Assignment in field officers in the implementation of management and monitoring of HCV area. In the Decree it is explained that establishing the names and positions of special officers (including job descriptions), identifying HCVs, establishing HCV management and monitoring and evaluation programs. The Job description is as follows:
 - Make HCV identification and evaluation.
 - Prepare the management and monitoring of the species RTE program.
 - Make evaluation of the management and monitoring of species RTE.
 - Monitoring HCV areas every 6 months.
 - Creating conservation activities (tree planting)
 - Inventory of the number of HCV Plans present in Balimbingan
 - Proposes replacement of HCV plank repairs if damaged and lost.

However, the management unit has not been able to show evidence of realization of HCV program.

Auditor Verification of 7 May 2018

In February 2018 there was an evaluation of the management program and monitoring of RTE species made by PPD RSPO and approved by Unit Manager, it is known that the program to be evaluated is the existence of flora and fauna around the plantation, evaluation method is field survey, evaluation of flora & fauna which is located around the plantation, the evaluation result is the specie flora and fauna found in the field still in accordance with the initial identification.

Based on the description above, the Non Conformance No. 2018.05 is comply.

Verified by : Radytio Puspanjana

NCR No.	: 2018.06	Issued by	: Radytio Puspanjana
Date Issued	: 10 February 2018	Time Limit	: ASA-1
NC Grade	: Minor	Date of Closing	: 7 May 2018
Standard Ref. & Requirement	: 5.2.4 Once the management plan is prepared, continuous monitoring documentation and report regarding the status of the RTE and HCVs are affected by the operations of the plantation and palm oil mill shall be available, and the results of monitoring are to be used to follow-up on the improvement of the management plan		
Non-Conformance Description & Evidence observed : The Management Unit has not been able to show the program evaluation of the HCV management and monitoring plan as well as the RTE species.			
Root Cause Analysis : There is no PIC set up to the program evaluation of the HCV management and monitoring plan as well as the RTE species.			
Correction : Establish the program evaluation of the HCV management and monitoring plan as well as the RTE species.			
Corrective Action : <ul style="list-style-type: none"> - Establish the PIC responsible for programming, implementation and evaluation of monitoring of RTE species - Officers should also be trained / socialized about the preparation of the RTE species management and monitoring program and evaluate the implementation of the program - Socialize the HCV management and monitoring plan (RTE species) to the workers 			
Assessor Evaluation and Conclusion : Auditor Verification of 7 May 2018 <ul style="list-style-type: none"> - The Management Unit demonstrated program evaluation and monitoring of RTE species made in February 2018 prepared by PPD RSPO and known by Unit Managers, explaining the program to be evaluated, evaluation methods, evaluation objectives, indicators and evaluation results. For example, the presence of planted flora and fauna, field survey evaluation methods, evaluation targets of flora and fauna around the Estate, population indicator, and evaluation result of flora and fauna species are found still in accordance with initial identification. - Management Unit shows evidence of socialization related to protected fauna located involving 50 participants of consisting of Manager, Assistant of Administration, plant assistant, security, Warehouse Chief, First Clerk and human resource Clerk, notes of activity are made by General HR Assistant and there is documentation of activities in the form of photos. The socialization material is about the distribution of HCV areas and protected wildlife species according to Government Regulation No. 5 of 1999. - The management unit shows evidence of HCV socialization on 6 January 2018 involving 20 workers consisting of managers, administrative assistants, plant assistants, security, Warehouse Chief, clerk and human resources , the minutes of such activities are made by the General HR Assistant. The socialization material is about the type and identification of HCV. - The Management Unit shows the Decree of Unit Manager (No.BAL/MU/Kpts/III/04/2018 in February 2018) regarding the appointment of Assignment in field officers in the implementation of management and monitoring of HCV area. In the Decree it is explained that establishing the names and positions of special officers (including 			

<p>job descriptions), identifying HCVs, establishing HCV management and monitoring and evaluation programs. The Job description is as follows:</p> <ul style="list-style-type: none"> • Make HCV identification and evaluation. • Prepare the management and monitoring of the species RTE program. • Make evaluation of the management and monitoring of species RTE. • Monitoring HCV areas every 6 months. • Creating conservation activities (tree planting) • Inventory of the number of HCV Plans present in Balimbangan • Proposes replacement of HCV plank repairs if damaged and lost. <p>- In February 2018 there was an evaluation of the management program and monitoring of RTE species made by PPD RSPO and approved by Unit Manager, it is known that the program to be evaluated is the existence of flora and fauna around the plantation, evaluation method is field survey, evaluation of flora & fauna which is located around the plantation, the evaluation result is the specie flora and fauna found in the field still in accordance with the initial identification.</p> <p>Based on the description above, the Non Conformance No. 2018.06 is stated comply.</p>	
<i>Verified by</i>	: Radytio Puspanjana

NCR No.	: 2018.07	Issued by	: Radytio Puspanjana
Date Issued	: 10 Februari 2018	Time Limit	: ASA-1
NC Grade	: Minor	Date of Closing	: 1 April 2019
Standard Ref. & Requirement	: 5.3.3 A documented waste management plan to avoid or reduce pollution and its implementation shall be available		
Non-Conformance Description & Evidence observed :			
<p>Implementation of domestic waste management is inconsistent with the Domestic Waste Management Procedures (No. SPO 20 revision 02) dated 2 January 2015. This is shown from field observations and interviews with residents of Division III and IV housing, that:</p> <ul style="list-style-type: none"> - domestic waste dumped on the edge of housing. - there are traces of domestic waste burning. - there is no final landfill. 			
Root Cause Analysis :			
<p>Workers' lack of understanding about domestic waste management procedures in accordance with existing regulations and the absence of facilities and infrastructure that support the implementation of the SOP.</p>			
Correction :			
<ul style="list-style-type: none"> - Make a warning sign forbidden littering - Making a warning sign is prohibited from burning domestic household waste - Create a final waste landfill at Division - Cleaning the area of garbage that has already been scattered 			
Corrective Action :			

- To socialize domestic waste management SOP to workers
- Create a circular from unit managers on domestic waste management procedures and warning if there are workers who violate the rules
- Making monitoring of domestic waste management in each Division housing

Assessor Evaluation and Conclusion (filled by auditor):

Verification 9 April 2018

- The company shows photos of areas that have been cleared of garbage.
- There is documentation prohibited from burning garbage, but there is no information on the number, location and amount.
- There is a circular from the Balimbingan Estate No. BAL / SE / intern / II / 2018 in February 2018, related to the ban on burning domestic household waste. The circular letter informs to make a trash can / behind the house. There is a record of socialization of domestic landfills, which was carried out on January 6, 2018 which attendance by 23 participants.
- There is monitoring of domestic waste management every month by document controller. For example, the monitoring in March 2018 carried out by the document controller revealed that garbage was piled up at the landfill and workers has understood the way in which domestic management was handled.

There is documentation (photo) for making organic and inorganic waste holes, but there is no information on the location and whether it has been assessed as effective and to accommodate the waste generated (volume of storage), as the landfill. **Non-conformity No. 2018.07 with Minor Category is open.**

Verification 1 April 2019

The results of interviews with residents of housing in Afdeling II there are trash can for organic and inorganic waste which placed in front of housing. Waste has been separated between organic and inorganic and transported to final landfills. In addition, there has been a ban on burning domestic waste. The results of field observations at landfill Blok 96 M Afdeling 2, waste has been separated between organic and inorganic. Based on the explanation above, this indicator is stated to have been fulfilled.

Verified by : **Brigitta Prita**

DOLOK SINUMBAH ESTATE

NCR No.	: 2017.04	Issued by	: Rizliani Aprianita Hsb.
Date Issued	: 27 March 2017	Time Limit	: ASA-1
NC Grade	: Minor	Date of Closing	: 1 April 2019
Standard Ref. & Requirement	: 2.1.3 Mechanisms to ensure compliance with the law should be implemented.		
Non-Conformance Description & Evidence observed (filled by auditor):			
Business Unit has a regulatory compliance evaluation report period in 2017. However, it has not been able to show the mechanism / procedure for evaluating compliance with laws or regulations			

Root Cause Analysis <i>(filled by organization audited):</i> Placement of documents is not yet regular so there are still documents stored not in the central place of data collection.	
Corrective Action <i>(filled by organization audited):</i> Show the mechanism / SOP about evaluating compliance with applicable laws or regulations	
Preventive Action <i>(filled by organization audited):</i> Archiving in Strategic Planning department.	
Assessor Evaluation and Conclusion <i>(filled by auditor):</i> Verification 1 March 2019 Perusahaan memiliki pedoman Dasar dan Instruksi Kerja Identifikasi dan Evaluasi Kepatuhan terhadap Peraturan perundangan No. dokumen 04.01/KOL/KOL/P/034 revisi 00 tanggal 1 Agustus 2018 yang telah ditinjau oleh Bagian Perencanaan Strategis. Berdasarkan SOP tersebut dijelaskan bahwa Evaluasi Kepatuhan terhadap Peraturan Perundang-undangan dilakukan oleh Kepala Sub Bagian/Urusan/Dinas terkait/Asisten SDM Umum dan Keamanan Distrik /unit/atau sekretaris P2K3 yang dilakukan secara berkala sedikitnya 1 tahun sekali. Berdasarkan penjelasan diatas, disimpulkan bahwa ketidaksesuaian dinyatakan terpenuhi. The company has Guidelines for Identification and Evaluation for Compliance with Regulations No. document 04.01 / KOL / KOL / P / 034 revision 00 dated 1 August 2018 which has been reviewed by the Strategic Planning Section. Based on the SOP, it was explained that the Compliance Evaluation of Legislation was carried out by the Head of the Subdivision / Affairs / Related Office / General and District Security HR Assistants / P2K3 units / secretaries who were conducted regularly at least once a year. Based on the explanation above, it was concluded that nonconformities were declared fulfilled.	
Verified by	: Rizliani Aprianita Hsb

NCR No.	: 2017.05	Issued by	: Rizliani Aprianita Hsb.
Date Issued	: 27 March 2017	Time Limit	: ASA-1
NC Grade	: Minor	Date of Closing	: 1 April 2019
Standard Ref. & Requirement	: 2.1.4 Systems to trace any changes in applicable laws and regulations must be provided and implemented.		
Non-Conformance Description & Evidence observed <i>(filled by auditor):</i> 1. Business Unit has not been able to show a mechanism or methodology adjustments in case of changes in laws and regulations in accordance with the operational needs of the business unit. 2. Based on the verification of the list of rules in 2017, it is known that the Business Unit has not been updating the regulations, such as regulations on the management of hazardous waste and minimum wage.			
Root Cause Analysis <i>(filled by organization audited):</i>			

<p>No PIC has been appointed to update the rules and regulations data Placement of documents is not yet regular so there are still documents stored not in the central place of data collection.</p>	
<p>Corrective Action <i>(filled by organization audited):</i></p> <p>Demonstrate the mechanism / methodology of the flowchart and have updated the regulations relating to the estate.</p>	
<p>Preventive Action <i>(filled by organization audited):</i></p> <p>issued circular letter that regulates periodic and scheduled regulatory updates Archiving in Strategic Planning department.</p>	
<p>Assessor Evaluation and Conclusion <i>(filled by auditor):</i></p> <p>Verification 1 April 2019 The company has Guidelines for Identification and Evaluation for Compliance with Regulations No. document 04.01 / KOL / KOL / P / 034 revision 00 dated 1 August 2018 which has been reviewed by the Strategic Planning Section. Based on the SOP, it is explained that updates or updates on laws and regulations are not limited to browsing from the internet or information from the head of sub-section, General and Security HR Assistant at District / unit, P2K3 secretary or related agencies.</p> <p>The company also showed an updated list of regulations and evaluations which included several regulations such as PP 44, 45, 46 of 2015, etc. Based on the explanation above, it was concluded that nonconformities were declared fulfilled.</p>	
Verified by	: Rizliani Aprianita hsb

NCR No.	: 2017.07	Issued by	: Muhammad Rinaldi
Date Issued	: 27 March 2017	Time Limit	: ASA-1
NC Grade	: Minor	Date of Closing	: 1 April 2019
Standard Ref. & Requirement	: 2.2.2 Evidence that legal boundaries are shown with a clear boundary and maintained.		
Non-Conformance Description & Evidence observed <i>(filled by auditor):</i>			
<ol style="list-style-type: none"> 1. The company owns boundaries pole that describes the position markers per section however it has not yet to be demonstrated that the poles were installed in accordance with a license/concession 2. Based on the field visit in block 06L and 92D, it is known that there is a non- conformance of installed poles, among others: <ul style="list-style-type: none"> - On the block 92D there is a pole with No. BPN 11 but in the pole examination documents, there is no pole with the number. - The absence of boundary pole in the field on block 06L while in the boundaries pole examination documents explain there are 3 boundary poles in the block 6L. 			

<p>Root Cause Analysis <i>(filled by organization audited):</i></p> <p>Not yet updated the monitoring of HGU marker caused it cannot be known clearly whether the existing HGU marker condition is still good, has been damaged or has been lost.</p>	
<p>Corrective Action <i>(filled by organization audited):</i></p> <p>Make monitoring of boundary markers in accordance with the HGU map so that it can be seen that the stake installed is in accordance with the coordinates given by the relevant agency</p>	
<p>Preventive Action <i>(filled by organization audited):</i></p> <ul style="list-style-type: none"> • The assistant monitors the boundary markers every 6 months according to appointment letter. • Make monitoring of boundary markers in accordance with the HGU map so that it can be seen that the boundary markers installed is in accordance with the coordinates given by the relevant agency. 	
<p>Assessor Evaluation and Conclusion <i>(filled by auditor):</i></p> <p>Verification 1 April 2019</p> <p>The Legal Department of PTPN IV Head Office has carried out an inventory of all the HGU markers in the Dolok Sinumbah Estate in July 2018. The activity was carried out using GPS to obtain the coordinates of each markers. Based on the results of the inventory, several of boundary markers are damaged or missing and CH were planned for replace in 2019 to complete all markers. Based on the improvements that have been made, this Non-conformity is stated closed and the realization of repair / installation of stakes in 2019 will be re-observed when the next visit.</p>	
<p>Verified by</p>	<p>: Ardiansyah</p>

NCR No.	: 2017.08	Issued by	: Muhammad Rinaldi
Date Issued	: 27 March 2017	Time Limit	: ASA-1
NC Grade	: Minor	Date of Closing	: 1 April 2019
Standard Ref. & Requirement	<p>: 2.2.5 For any conflict or dispute related to land, there must be evidence that the disputed land has been mapped in adjacent communities and the local authorities if necessary.</p>		
<p>Non-Conformance Description & Evidence observed <i>(filled by auditor):</i></p> <p>The company has show location map to dispute area, however the company cannot be shown that the map was made in a participatory manner with affected parties.</p>			
<p>Root Cause Analysis <i>(filled by organization audited):</i></p> <p>There is already a map of dispute location but has not been signed by the village head.</p> <p>There is already a procedure for resolving and handling the land conflicts in a participatory manner with the affected communities set out in the SOP Land Conflict Management.</p>			

Corrective Action <i>(filled by organization audited):</i>	
<ol style="list-style-type: none"> 1. It can be shown that the map was made in a participatory manner with the affected parties. 2. Coordinate and communicate with the village head and related communities affected. 	
Preventive Action <i>(filled by organization audited):</i>	
Conduct monitoring once a year to update conflict area map data if there is a new land conflict in estate.	
Assessor Evaluation and Conclusion <i>(filled by auditor):</i>	
1 April 2019	
CH has shown a map of the disputed area made in a participatory manner with Village Head of Nagori Pem. Kerasan Rejo. In addition, the management unit also showed monitoring of disturbances in the company's area and assets, border disturbances and conflicts with the community. The Non-conformity is closed	
Verified by	: Ardiansyah

NCR No.	: 2017.17	Issued by	: Dwi Haryati
Date Issued	: 27 March 2017	Time Limit	: 1 July 2019
NC Grade	: Minor raised to MAJOR	Date of Closing	: 19 June 2019
Standard Ref. & Requirement	4.7.5 There shall be procedures in case of accidents and emergencies along with the instructions that should be able to be clearly understood by all workers. Procedure in case an accident should be provided in a language that can be understood by the workers. Workers who have been trained to provide first aid should be present both in the field and in other operations, and equipment for first aid should always be available in the workplace. Note all accidents must be kept and reviewed regularly.		
Non-Conformance Description & Evidence observed <i>(filled by auditor):</i>			
<ul style="list-style-type: none"> • Management unit has shown document of monitoring first aid box where located in the building, but has not shown monitoring for bags that are in field supervisor. • Based on field visit in the oil warehouse, it is known that the fire extinguisher is not pressurized. This is not in accordance with the result of workplace inspection stating that the extinguisher is still in good condition. 			
Root Cause Analysis <i>(filled by organization audited):</i>			
<ul style="list-style-type: none"> • The absence of an evaluation of the suitability between the results of inspection of OHS facilities and the realization in the field • There has been no evaluation of the understanding of officers after obtaining a socialization of the procedures for first aid for work accident 			
Corrective Action <i>(filled by organization audited):</i>			
<ul style="list-style-type: none"> • Inspection report on the first aid kit in foreman's • Replacing fire extinguisher that is not pressurized at mill and estate • Completing the contents of the first aid kit which is not complete in estate • Making mechanisms for implementation and evaluation training 			

Preventive Action *(filled by organization audited):*

- Conduct fire extinguisher inspections and refill if fire extinguisher is not pressurized
- Evaluate the suitability between the results of inspection of OHS facilities and the realization in the field.
- Evaluate the understanding of officers after obtaining a socialization of the procedures for first aid for work accident

Assessor Evaluation and Conclusion *(filled by auditor):***Verification during ASA-1 (1 April 2019)**

- Dolok Sinumbah Estate routinely monitors first aid equipment every month, for example, can be shown proof of monitoring until the period of March 2019, monitoring results inform the condition of equipment and equipment. Mismatch in point 1 has been accepted and fulfilled.
- Dolok Sinumbah Estate and Balimbingan Estate have routinely conducted fire extinguisher and first aid kit monitoring every month. Based on field observations at mill and estate it is known that the fire extinguisher condition is not sealed and not pressurized. Based on field observations on harvesting activities at the Dolok Sinumbah AFD III, Dolok Sinumbah hazardous waste warehouse, Dolok Sinumbah fuel tank and spraying activities in Balimbingan, it appears that first aid equipment is incomplete (less than 21 items). In this regard, the company has not been able to show evidence that monitoring has been carried out and evaluated effectively. Non-conformity in point 2 has not been fulfilled.
- In addition, based on document review when ASA-1, Dolok Sinumbah and Balimbingan Estate have carried out first aid training to the officers assigned. Interview with the spraying foreman in Balimbingan and the foreman of harvest in Dolok Sinumbah ADF III, it is known that it cannot explain the stages of first aid. Related to this, CH have not been able to show evidence that first aid training has been carried out effectively.

Based on the results of the verification above, Non-conformity in these indicators are stated to have not been closed and raised to MAJOR.

Verification on 28 May 2019

The company has shown proof of improvement, consist of:

- Monthly inspection report of equipment and first aid kit for Balimbingan Estate period 2019 (Jan - May) at the central office, warehouse, engineering, nursery, Afdeling I office, Afdeling II office, Afdeling III office, Afdeling IV office.
- Report on evaluating the non-conformity of monitoring results of facilities and infrastructure for the emergency response of Dolok Sinumbah Estate in 10 units in locations: central office, central warehouse, chemical warehouse, lubricant warehouse, hazardous waste warehouse, electrical workshop, general workshop, laboratory, assistant office and water treatment station.
- Evidence of first aid socialization conducted on 9 April 2019 in Balimbingan Estate followed by assistants and workers, with a total number of 15 participants and evidence of evaluation of training results for 14 participants informing names, positions, sections, evaluation results and conclusions.
- Proof of submission of first aid kit and foreman's bag on 10 May 2019 to the Afd III assistant and proof of completing the contents of the first aid kit at the hazardous waste warehouse and lubricant warehouse.
- Evidence of first aid socialization and training on 24 April 2019 which was attended by 50 participants and evidence of training evaluation which explained that the training had been successful with additional notes to several participants.

- Appointment letter of officers and person in charge of conducting OHS monitoring and inspection No: SK DOS / M / Kpts / 01 / IV / 2019 on behalf of Edwin Mahmudy and M Pardoni by Estate Manager.

However, CH has not been able to show evidence:

- Evidence of first aid equipment identification and monitoring carried out by the foreman of activities in Balimbingan Estate.
- Evidence of identification and monitoring of first aid kits carried by the foremen of activities in Dolok Sinumbah Estate.
- Evidence of establishing first aid officers at the work location and socialization for all first aid officers throughout the activities and counseling of Balimbingan Estate.
- Evidence of establishing first aid officers at work locations and proof that all PICs assigned as first aid workers at work locations are included in the training.
- Schedule of evaluation and monitoring of first aid kits in Dolok Sinumbah and Balimbingan.

Based on the evidence, non-conformity is not closed.

Verification 13 June 2019

Unit Dolok Sinumbah and Balimbingan show evidence of improvement, consist of:

- Evidence of first aid equipment monitoring at the field with oversight of the foreman, monitoring period Jan - Jun 2019 for Balimbingan Estate.
- Evidence of monitoring of first aid kits brought by foremen for Dolok Sinumbah Estate for the period of January - May 2019.
- Schedule and monitoring program for first aid kits and boxes that are carried out every month as well as the evaluation schedule which is carried out every month after a routine inspection for Dolok Sinumbah Estate (week 4) and Balimbingan Estate (week 3).
- Appointment letter of officers who monitor first-aid equipment in the Balimbingan Estate No. SK unit: BAL / KPTS / 03 / IV / 2019 dated 4 April 2019 for 6 people, consist of clerk and foremen.
- Documentation and minutes of first aid training conducted on April 9, 2019 in the Balimbingan Estate consist of 35 for office staff, 61 workers in Afdeling 1, 69 workers in Afdeling 2, 72 workers in Afdeling 3 and 79 workers in Afdeling 4.

However, there is no evaluation evidence available on the effectiveness of the training. Non-conformity is not yet closed.

Verification 19 June 2019

The management unit has shown proof of evaluation for workers who have participated in the training conducted on April 9, 2019. Based on this explanation, non-conformities is closed.

Verified by : Sandra Purba

NCR No.	: 2017.20	Issued by	: Riziani Aprianita Hsb
Date Issued	: 27 March 2017	Time Limit	: ASA-1
NC Grade	: Minor	Date of Closing	: 30 March 2019
Standard	: 5.1.3		
Ref. &	There are environmental monitoring plan document and implementation report and also		

Requirement	improvement plan according the monitoring results if it found discrepancy. This plan is reviewed at least 2 years.
Non-Conformance Description & Evidence observed <i>(filled by auditor):</i>	
<ol style="list-style-type: none"> 1. Based on the results of document verification of report of RKL-RPL monitoring results, it is known that there are still environmental parameters have not been monitored, managed and evaluated by the business unit, for example, the source of the impact of aquatic biota (parameter being monitored in the form of diversity index and uniformity of aquatic biota (plankton and benthos) were performed every 6 months. 2. Business Unit has reported RKL-RPL implementation semester I of 2016 to the relevant agencies. However, it has not provided sufficient evidence that the preparation of the Report of the RKL-RPL in accordance with Minister regulation no. 45 of 2005 on Implementation Guidelines for Preparation of RKL-RPL. 	
Root Cause Analysis <i>(filled by organization audited):</i>	
<ul style="list-style-type: none"> • There is negligence in preparing an environmental monitoring program that is not in accordance with the RKL and RPL which have not been tested for plankton and benthos. • Because the new document controller does not understand the procedures for preparing an environmental monitoring program that is in accordance with the RKL / RPL matrix. 	
Corrective Action <i>(filled by organization audited):</i>	
<ul style="list-style-type: none"> • Monitor aquatic biota (plankton and benthos) by sending river water samples to be tested every 6 months. • Conducted preparation of the RKL-RPL report in accordance with Environmental Decree No. 45 of 2005 by including the results of testing of aquatic biota (plankton and benthos). 	
Preventive Action <i>(filled by organization audited):</i>	
<ul style="list-style-type: none"> • Conduct regular monitoring of aquatic biota (plankton and benthos) every 6 months. • Conducting the preparation of the RKL-RPL report in accordance with the Minister of Environment Decree No. 45 of 2005 concerning guidelines for preparing the RKL-RPL implementation by document controller. 	
Assessor Evaluation and Conclusion <i>(filled by auditor):</i>	
<p>Verification 23 October 2017.</p> <ul style="list-style-type: none"> • The company shows letter No. DOS / MU / Kpts / / / 2017 concerning officers in the preparation of reports on the results of monitoring and environmental management (RKL-RPL) with one of the tasks of compiling the RKL-RPL Report every 6 months. • The company shows the results of monitoring (monitoring) of aquatic biota with no. series 6663 / SL / VII / 17 published on August 14, 2017. <p>However, the company has not been able to demonstrate the management and evaluation of sources of aquatic biota impacts in accordance with the Non-conformity point 1. In addition, the company has not been able to show evidence that the RKL-RPL Report prepared has been in accordance with Environmental Decree No. 45 of 2005 concerning guidelines for preparing the implementation of the RKL-RPL in accordance with non-conformity point 2.</p> <p>Based on these explanations, non-conformity is not yet closed.</p> <p>Verification 30 March 2019.</p> <p>Point 1.</p>	

The company shows water biota testing conducted on July 12, 2018 by a Laboratory accredited by KAN LP 001 IDN with the following results:

Parameter	Lokasi			Unit	Diversity
	50 meter before WWTP	50 meter after WWTP	WWTP		
Benthos	57	57	143	Number individu/Liter	100
Plankton	1000	600	3600	Number individu/Liter	100

The company shows a trend evaluation document regarding testing of aquatic biota (Plankton) diversity index at location 1 for semester I & II 2018 decreases; while locations 2 & 3 tend to increase. Equity index in location 1 tends to be evenly distributed, location 2 tends to decrease and location 3 results are the same. and location dominance index 1 tends to increase while location 2 & 3 dominance tends to decrease, while for benthos diversity index at locations 1 & 2 tends to decrease and at location 3 tends to increase, for equity index at locations 1 & 3 tend to be evenly distributed and location 2 tends to decrease . The location dominance indexes 1 & 2 tend to increase while location 3 tends to shrink.

Point 2.

The Company has shown the implementation of RKL / RPL Semester II in 2018 which refers to the 2018 PTPN IV Environmental Evaluation Document in accordance with number 188.45 / 556 / 10.2 / 2018. The monitored impacts include:

1. Air quality testing every 6 months is located in the POM process room, POM yard and residential areas around the POM location.
2. Noise level every 6 months is located in the POM process room, POM yard and residential areas around the POM location.
3. Testing of ground water located at the well of the community around the location of POM & monitoring well around the LA area every 6 months.
4. Testing the water quality located at the around of POM and LA area every 6 months.
5. Testing of POME quality every 1 month is located in the WWTP inlet & outlet.
6. Aquatic biota is located in water bodies around the POM and LA area every 6 months.
7. Socio-economic (regional economy; employment & business opportunities & public facilities) located in the area around the estate & POM of Huta Bayu Raja District, Simalungun Regency every once a year.
8. Socio-culture (social process; public perception & safely) is located in the area around the estate & POM of Huta Bayu Raja District, Simalungun Regency every once a year.
9. Public health (prevalence of disease) is located in the area around the estate & POM of Huta Bayu Raja District, Simalungun Regency every once a year.

Based on the explanation above, this non-conformity is closed.

Verified by : **Brigitta Prita**

NCR No.	: 2017.22	Issued by	: Rizliani Aprianita Hsb
Date Issued	: 27 Maret 2017	Time Limit	: ASA-1
NC Grade	: Minor	Date of Closing	: 1 April 2019
Standard Ref. & Requirement	: 5.2.3 There are socialization program of the status of protected, RTE species to all workers and record of sanction to individuals who work to the business unit if it is proven to catch, harm, collect or kill the species.		

<p>Non-Conformance Description & Evidence observed <i>(filled by auditor):</i></p> <p>Business Unit has a Circular Letter regarding the protection of animals and plants are endangered and protected. However, in the Circular Letter has not explained about the sanctions to the worker if it is proven capture, hurt, collect or kill species listed in the Rare Threaten Endangered categories.</p>
<p>Root Cause Analysis <i>(filled by organization audited):</i></p> <p>The Business Unit has not explained about giving sanctions to workers if proven to have caught, hurt, collected or killed species category of Rare, Threaten, Endangered.</p>
<p>Corrective Action <i>(filled by organization audited):</i></p> <p>Make a circular letter explaining about giving sanctions to workers if they are proven to have caught, harmed, collected or killed species category of Rare, Threaten and Endangered.</p>
<p>Preventive Action <i>(filled by organization audited):</i></p> <p>outreach to all workers regarding a circular explaining the provision of sanctions to workers if proven to have caught, hurt, collected or killed species belonging to the category Rare Threaten Endangered</p>
<p>Assessor Evaluation and Conclusion <i>(filled by auditor):</i></p> <p>The company shows a circular dated April 12, 2017 with no. DOS / SE.Int / 18 / IV / 2017 concerning Prohibition and sanctions proven to catch, hurt, collect or kill species category Rare Threaten Endangered. The circular letter has not explained about giving sanctions to workers if it is proven that they have caught, harmed, collected or killed species belonging to the category of Rare Threaten Endangered.</p> <p>Based on this, the non-conformity is not yet closed.</p> <p>Verification 1 April 2019.</p> <p>The Company has shown a Circular with No. DOS / SE.Int / 03 / I / 2018 dated January 3, 2018 concerning protection of rare protected animals and plants which pursuant to Law No.5 of 1990 concerning Conservation of nature and its Ecosystem, Law No.23 year 1997, Law 41 of 1999 concerning forestry and others. Delivered that all Afdeling / parts in Dolok Sinumbah:</p> <ol style="list-style-type: none"> 1. It is not permissible to catch, maintain, sell and buy rare and protected animals. 2. It is not permissible to damage, cut down rare / protected plants / trees. 3. Criminal sanctions for people who intentionally violate provisions with a maximum of 5 years in criminal terms and a fine of IDR 100,000,000 in accordance with article 40 paragraph 2 of Law No. 5 of 1990. <p>In addition, socialization of animal protection is available on June 30, 2018. The results of interviews with residents of Afdeling 3 housing are known to have been socialized regarding the prohibition of hunting and maintaining wildlife.</p> <p>Based on the explanation above, non-conformity is closed.</p>
<p>Verified by : Brigitta Prita</p>

NCR No.	: 2017.23	Issued by	: Rizliani Aprianita Hsb
Date Issued	: 27 Maret 2017	Time Limit	: ASA-1
NC Grade	: Minor	Date of Closing	: 1 April 2019

Standard Ref. & Requirement	5.2.4 If a management plan has been arranged, it should be provided documentation and ongoing monitoring reports on the status of RTE species and HCV operational affected plantations and palm oil mill and the results of the monitoring are used to follow up the management plan.
Non-Conformance Description & Evidence observed <i>(filled by auditor):</i>	
Business Unit showed a document of monitoring HCV area . However, it has not provided sufficient evidence that monitoring of HCV (and species RTE) is done periodically in accordance with the recommendations monitoring in the document of HCV Reports and its evaluation.	
Root Cause Analysis <i>(filled by organization audited):</i>	
Officers do not understand about monitoring species, especially based on their protection status.	
Corrective Action <i>(filled by organization audited):</i>	
Monitor HCV (and RTE species) periodically in accordance with monitoring recommendations on the HCV Report document and its evaluation.	
Preventive Action <i>(filled by organization audited):</i>	
Document periodically evaluating the results of monitoring of HCV (and RTE species) according to recommendations for monitoring HCV Report documents.	
Conduct monitoring every six months by document controller. Officers have been given an understanding of the types of animals that are protected.	
Assessor Evaluation and Conclusion <i>(filled by auditor):</i>	
Verification 1 April 2019. Dolok Sinumbah Estate has shown animal monitoring documents every 6 months, carried out in March 2019 in the HCV area, it is known that species have been differentiated based on IUCN, CITES & government regulations for example: 25 types of Aves Least concern (LC); 2 types of reptile Least concern (LC); 10 types of mammals; 2 types of Aves and 5 types of Reptiles including the CITES category Appendix 2. Based on the explanation above non-conformity is closed.	
Verified by	Brigitta Prita

NCR No.	2017.25	Issued by	Rizliani Aprianita Hsb
Date Issued	27 March 2017	Time Limit	1 July 2019
NC Grade	Minor raised to Major.	Date of Closing	14 June 2019
Standard Ref. & Requirement	5.3.3 Must be available waste management plan which is documented and implemented to prevent and reduce pollution.		
Non-Conformance Description & Evidence observed <i>(filled by auditor):</i>			
Based on the results of field visits in housing complex Afdeling 1, it is known that there is a domestic waste that burned in the back of the worker houses. This is not in accordance with the domestic waste management procedures SPO No. 20 January 2, 2015.			

<p>Root Cause Analysis <i>(filled by organization audited):</i></p> <p>Lack of socialization of handling domestic waste.</p>
<p>Corrective Action <i>(filled by organization audited):</i></p> <ul style="list-style-type: none"> • Make a Circular about the prohibition of burning domestic waste. • Socialization domestic waste handling to employees and their families.
<p>Preventive Action <i>(filled by organization audited):</i></p> <ul style="list-style-type: none"> • Making domestic waste disposal sites for employees. • Monitoring domestic waste management.
<p>Assessor Evaluation and Conclusion <i>(filled by auditor):</i></p> <p>Verification 1 April 2019. CH has SOP for hazardous waste management in document No: SPO 02 dated 2 January 2017 stating that all chemical container and contaminated packaging is hazardous waste type and is managed in accordance with applicable hazardous waste management regulations. Beside that CH also has a domestic waste management procedure No: SPO-20 dated 2 Jan 2018 which explains that domestic waste management is carried out by separating organic and inorganic, taken by officers and taken to the landfill.</p> <p>The results of field observations are known that:</p> <ul style="list-style-type: none"> • Domestic waste is disposed of around the WWTP; beside & behind hazardous waste warehouse; behind Dolok Sinumbah office, around the palm oil plantation bordering the Malangis Village community. • Chemical container (Drum Lubricant) is used as reservoir of water at the rinse house of Dolok Sinumbah Estate. • The leachate of EFB in Dolok Sinumbah POM flows into the ditch drainage that leads to the Bah Tongguran River. • The observation results at Afdeling III Housing are known that domestic waste is thrown behind the housing. In addition, the location of final waste disposal is less than 1 Kilometer and organic & inorganic waste is combined in the final landfill. The results of interviews with housing residents known that there is no disposal site in housing complex, so that workers make their own garbage holes and for dry waste if they are full they will be burned <p>Based on the explanation above, CH has not managed waste in accordance with applicable procedures. The Non-conformity in this indicator is upgrade to Major.</p> <p>Verification 26 May 2019 CH shows a photo documentation of cleaning domestic waste located around the WWTP, besides & behind the hazardous waste warehouse, behind the central office, around the oil palm plantation bordering the Malangis Village community and cleaning leachate in POM.</p> <p>CH shows the minutes of the return of lubricant drums on 7 May 2019 and socialization of hazardous waste management at Dolok Sinumbah Estate & POM on April 12, 2019.</p> <p>Minutes of information on the handling of domestic waste in Afdeling I & V Dolok Sinumbah were held on April 22, 2019 attended by Assistant, foreman and clerk.</p>

But CH not yet inform the evidence of correction for domestic waste management and information of lubricat drum after return. Based on the explanation above, this non-conformity is not yet closed.

Verification 14 June 2019

Based on hazardous waste logbook inform that lubricant drum has been entered into the hazardous waste warehouse in Dolok Sinumbah POM on 7 May 2019. CH has shown documentation evidence of making landfill in each afdeling and the location of the landfill which is far from the housing area. Based on the explanation above, this non-conformity is closed and will be observed during the next surveillance.

Verified by : **Brigitta Prita**

NCR No.	: 2017.27	Issued by	: Riziani Aprianita Hsb
Date Issued	: 27 March 2017	Time Limit	: ASA-1
NC Grade	: Minor	Date of Closing	: 1 April 2019
Standard Ref. & Requirement	: 5.6.3 Must be available plans and results of regular monitoring of the emissions and pollutants from activities of plantation and palm oil mill by using the appropriate method.		
Non-Conformance Description & Evidence observed <i>(filled by auditor):</i>			
Business Unit has not been able to shown the results of calculation of GHG emissions in 2016 using the RSPO PalmGHG.			
Root Cause Analysis <i>(filled by organization audited):</i>			
<ul style="list-style-type: none"> • Has not shown the results of the 2016 GHG emission calculation using the RSPO PalmGHG. • The data needed is incomplete for GHG calculations using a GHG calculator 			
Corrective Action <i>(filled by organization audited):</i>			
<ul style="list-style-type: none"> • Shows the results of GHG emission calculation using the RSPO PalmGHG version 3.0.1. 			
Preventive Action <i>(filled by organization audited):</i>			
Conduct more effective data collection process so that it can more quickly carry out calculations using the GHG calculator version 3.0.1.			
Assessor Evaluation and Conclusion <i>(filled by auditor):</i>			
Verification 1 April 2019.			
CH shows Palm GHG calculations using PalmGHG calculator version 3.0.1 for Dolok Sinumbah POM period 2018 with details:			
Summary of Net GHG Emissions.			
Emissions per Product		tCO2e/tProduct	
CPO		1.45	
PK		1.45	
Production		t/yr	

FFB processed	140125.58
CPO Produced	15807.14

Extraction	%
OER	11.28
KER	1.85

Land use	ha
OP Planted area	7378.2
OP planted on peat	0
Conservation (forested)	0
Conservation (Non-forested)	433.97
Total	

Summary of field emissions and sinks

	Own Crop			Group		3 rd Party	
	tCO2e	tCO2e/ha	tCO2e/t FFB	tCO2e	tCO2e/ha	tCO2e	tCO2e/ha
Emissions							
Land conversion	73135.45	9.36	0.52	0	0	0	0
*CO2 Emissions fertiliser	4073.96	0.52	0.03	0	0	0	0
**N2O Emissions	3398.37	0.44	0.02	0	0	0	0
Fuel Consumption	354.38	0.05	0	0	0	0	0
Peat Oxidation	0	0	0	0	0	0	0
Sinks							
Crop sequestration	-73135.45	-9.36	-0.52	0	0	0	0
Conservation Sequestration	0	0	0	0	0	0	0
Total	7826.710	1	0.06	0	0	0	0

Summary of Mill Emissions and Credits

	tCO2e	tCO2e/tFFB
Emissions		
POME	16267.35	0.12
Fuel consumption	244.74	0
Grid electricity	2297.79	0.02
Utilization		
Credits		
Export of grid electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	18809.88	0.13

Palm oil Mill Effluent (POME) Treatment

Divert to compost	0 %
Divert to anaerobic digestion	100 %

POME Diverted to Anaerobic Digestion

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

Based on the explanation above, the non-conformity is closed.

Verified by : **Brigitta Prita**

NCR No.	: 2017.29	Issued by	: Muhammad Rinaldi
Date Issued	: 27 Maret 2017	Time Limit	: ASA-1
NC Grade	: Minor	Date of Closing	: 1 April 2019
Standard Ref. & Requirement	: 6.1.4 The management plan and monitoring social impacts have been documented, to be reviewed at least every 2 years. If needed, the plan should be corrected. There shall be evidence that the review process involves the participation of all affected parties.		
Non-Conformance Description & Evidence observed <i>(filled by auditor):</i> Business unit has not showed the evidence of reviewing the Management and monitoring of social impact that involve the affected parties every 2 years			
Root Cause Analysis <i>(filled by organization audited):</i> The company has established document controller to handling RSPO implementation documents. When the audit cannot be given the said document is due to the lack of understanding of the officer (PPD) in the provision of documents to the auditor during the audit.			
Corrective Action <i>(filled by organization audited):</i> <ul style="list-style-type: none"> - Develop managing and monitoring social impacts every year - Store the document in one special place so it's easy to immediately give it to the auditor. - Socialize the storage of RSPO documents to document controller 			
Preventive Action <i>(filled by organization audited):</i> <ul style="list-style-type: none"> - A plan for managing and monitoring social impacts has been carried out every year (2015 and 2016). • Make monitoring of social impact management plans every 6 months conducted by HR assistant and HR clerk 			
Assessor Evaluation and Conclusion <i>(filled by auditor):</i> Verification 1 April 2019 Dolok Sinumbah Estate has reviewed the social impact management plan carried out on the 25th of January 2018 (review of 2017 plans). The results of the review have been used as input in the preparation of programs and plans for 2018. Dolok Sinumbah Estate has conducted training and socialization of documentation and storage of records of RSPO implementation to document controller in 2018.			

Based on these evidences, non-conformity is closed.

Verified by : **Sandra Purba**

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

<i>NCR No.</i>	: 2019.01	<i>Issued by</i>	: Sandra Purba
<i>Date Issued</i>	: 2 April 2019	<i>Time Limit</i>	: ASA-2
<i>NC Grade</i>	: Minor	<i>Date of Closing</i>	: 19 June 2019
<i>Standard Ref. & Requirement</i>	: 2.2.2 Evidence that legal boundaries are shown with a clear boundary and maintained.		
Evidence observed (filled by auditor):			
Based on document studies, the results of interviews and visits in the field, it was found that there was an area of + 2 ha which was released from Kebun Balimbing Estate (Afdeling IV) during the extension of HGU on. The results of the field visit revealed that there were no boundaries between the Balimbing Estate and the area that had been released from the HGU.			
Non-Conformance Description (filled by auditor):			
Balimbing Estate has not been able to show clear and maintained legal boundaries			
Root Cause Analysis (filled by organization audited):			
The distance between one bounding pole and another is too far so that it does not represent the boundary area that has been set according to the existing HGU.			
Correction (filled by organization audited):			
Adding auxiliary boundary stakes so that the boundaries of the HGU area instead of HGU are clearer			
Corrective Action (filled by organization audited):			
Periodically monitor boundary markers conditions every 6 months so that you can know the boundaries of the plantation area.			
Assessor Evaluation and Conclusion (filled by auditor):			
Verification 11 June 2019			
The management unit has shown a letter from the Balimbing Unit No. BAL / 04.13 / 08 / V / 2019 dated 22 May 2019 related to the addition of the HGU boundary marker to the Land Law Department of PTPN IV HQ. In addition, the management unit also sent documentation on the condition of the 96BX Afdeling IV Block which required the addition of HGU boundary marker. The management unit has also set up a special officer consisting of an Afdeling assistant and foreman to monitor HGU boundary markers with the details of the assignment:			
<ul style="list-style-type: none"> • Creating a boundary markers monitoring program (HGU) • Perform boundary markers monitoring (HGU) in each work unit on schedule • Report the results of monitoring to HR and general assistants • Each boundary markers / HGU pillar is made a circle • The boundary markers / HGU pillar is cleaned every 2 months. 			
However, the management unit has not been able to demonstrate the implementation of the installation of HGU boundary markers in the field. Based on this, Non-conformity No. 2019.01 is not yet closed.			
Verification 19 June 2019			
The management unit has shown a letter from the Legal / Land Division dated 17 June 2019 which informs that the			

addition of the HGU boundary markers is in process. Based on evidence of such improvement, the Non-conformity is closed and will be observed again during the next visit.

Verified by : **Sandra Purba**

NCR No.	: 2019.02	Issued by	: Brigitta Prita
Date Issued	: 2 April 2019	Time Limit	: 1 July 2019
NC Grade	: Major	Date of Closing	: 19 June 2019
Standard Ref. & Requirement	: 4.4.2. Perlindungan badan air dan lahan basah, termasuk menjaga dan memelihara daerah sempadan sungai dan daerah penyangga badan air lainnya pada saat atau sebelum penanaman ulang, harus dapat ditunjukkan.		

Evidence observed (filled by auditor):

Based on field observations in Block 97 A Afdeling IV riparian area of Bah Kasindir, it is known that riparian area has been planted with palm oil in 2016; there is no spray limit, there is no HCV area information board and there are former chemical spraying activities. In addition, the results of the identification study and HCV map for the period of 2011 revealed that the area entered into the HCV Area with HCV 4 attributes.

Non-Conformance Description

This is not in accordance with the mechanism procedure of riparian area management (05) January 2nd, 2015; such as marking riparian area and conservation area; make prohibition on the riparian area, on the riparian area which has been planted with palm oil, the vegetation should be maintained with a ban on spraying; planting / enrichment in empty riparian area or bushes and others



Sempadan Sungai Bah Kasindir Blok 97 A.

Root Cause Analysis (filled by organization audited):

- Insufficient understanding of workers in conducting chemist activities in accordance with existing SOPs
- The officer who monitors the river border conditions including the HCV area is not yet been determined
- There has been no monitoring of river border conditions (HCV area) carried out by supervisory officers.

Correction (filled by organization audited):

- Make a spraying boundary sign, HCV signage on the river border area.
- Provide socialization procedures for river border management to chemist workers
- Make monitoring of river border conditions (HCV area) every 6 months
- Determine the PIC who is responsible for monitoring the river boundary conditions that enter the HCV area

Corrective Action (filled by organization audited):

- Establish a river border management mechanism including HCV area
- Make a commitment to implement the river border management mechanism including HCV area

Assessor Evaluation and Conclusion (filled by auditor):

Verification 26 May 2019

The company shows proof of improvement including:

- Provision of spraying border marker on riparian areas Located in Block 97 A Afdeling IV Bah Kasindir River.
- The company shows a decree on the determination of field officers for HCV management and monitoring of Dolok Sinumbah Estate / POM.
- Monitoring the prohibition area of chemical in Afdeling I-IV in April 2019.
- The mechanism of protection of water bodies and wetlands.
- The company's commitment to implement riparian management dated January 5, 2019.
- Dissemination of HCV management area on June 4, 2018 to employees.

But the proof of improvement given has not explained:

- Distance of the spraying marker in the riparian area
- Information of signboard for HCV area in riparian area

So this non-conformity is not yet closed.

Verification 14 June 2019

The company shows evidence of the installation of spraying boundary markers in the riparian area with a distance of 50 meters, the installation of HCV signboards, but not explained the type of HCV and HCV attribute. Information signboards are not combined with prohibition of spraying. So this non-conformity is not yet closed.

Verification 19 June 2019

The company has shown the documentation of the installation of the HCV information board located in Block 97 A of the Dolok Sinumbah Estate which has informed the HCV 1.1 attribute. In addition, the management unit also shows the results of monitoring all HCV signboard locations throughout the region. Based on monitoring data in May 2019 there were 7 HCV signboards found in 6 Afdeling. Based on the evidence being sent, non-conformity is closed.

Verified by : Brigitta Prita

<i>NCR No.</i>	: 2019.03	<i>Issued by</i>	: Yudhi Yuniarto Tallutondok
<i>Date Issued</i>	: 2 April 2019	<i>Time Limit</i>	: ASA-2
<i>NC Grade</i>	: Minor	<i>Date of Closing</i>	:
<i>Standard Ref. & Requirement</i>	: 4.6.7 Application of pesticides shall be by proven methods that minimize risk and negative impacts.		

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

The company has procedures related to the Management and Storage of Chemicals with Number 23 dated March 4, 2019. In point 6.7.6 it is explained that mixing chemicals is only done at home rinse the available ones. However, based on field observations for circle and path spray activities on Blok 95E Division I Balimbangan Estate, it is known that mixing pesticides is carried out in the field (picture attached) where it is not in accordance with the procedures that the company has.



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

- Insufficient understanding of officers in implementing established procedures.
- Not yet socialized the implementation of procedures to workers on a scheduled basis by Chemist Foreman and Assistants in each afdeling.

Correction *(filled by organization audited):*

- Conduct mixing the chemicals at home rinse according to existing SOPs
- Providing information on procedures for managing and storing chemicals to the officers concerned

Corrective Action *(filled by organization audited):*

Evaluate the understanding of officers after obtaining information on the implementation of procedures for managing chemicals so that in the future the implementation of chemical management is in accordance with existing procedures. The management unit has a mechanism for implementing an evaluation of officers' understanding after getting socialization / training.

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

Verification 14 June 2019

The company sends some proof of improvement as follows:

1. Minutes of socialization the mixing of chemicals on 8 April 2019 at the Afdeling I Office, which was attended by 61 spray workers and foremen. Material, attendance lists and documentation of the socialization are available.
2. Minutes of socialization the mixing of chemicals on April 8, 2019 at the Afdeling II Office which was attended by 69 employees and spray foremen. Material, attendance lists and documentation of the socialization are available.
3. Minutes of socialization the mixing of chemicals on 8 April 2019 at the Afdeling III Office, which was attended by employees and spray foremen with a total of 70 people. Material, attendance lists and documentation of the socialization are available.
4. Minutes of socialization the mixing of chemicals on 8 April 2019 at the Afdeling VI Office which was attended by 78 spray workers and foremen. Material, attendance lists and documentation of the socialization are available.
5. Minutes of socialization of procedures for the implementation of chemistry on April 8, 2019 at the Afdeling I

- Office, which was attended by employees and spray foremen with a total of 10 people. Material, attendance lists and documentation of the socialization are available.
6. Recapitulation of evaluation of socialization of mixing chemicals with 6 employees of chemist Afdeling I. From the evaluation results, it was found that the average employee had a good understanding of the procedure for mixing chemicals.
 7. Recapitulation of evaluation of socialization of mixing chemicals with 6 employees of chemistry Afdeling II. From the evaluation results, it is known that the average employee has a good understanding regarding the procedure for mixing chemicals.

Based on this, the auditor concluded that nonconformities had not been fulfilled. The company must first answer the auditor's questions in the root problem analysis column and corrective action.

Verification

The management unit has provided explanations related to the root cause and corrective actions, but the explanation related to corrective actions has not answered in accordance with the root of the problem. In addition, there is no evidence of correction which informs that mixing chemicals has been done at home rinse according to the existing SOP. Based on the results of the verification, non-conformity is not yet closed.

Verified by : **Yudhi Yuniarto Tallutondok**

<i>NCR No.</i>	: 2019.04	<i>Issued by</i>	: Sandra Purba
<i>Date Issued</i>	: 2 April 2019	<i>Time Limit</i>	: 1 July 2019
<i>NC Grade</i>	: Major	<i>Date of Closing</i>	: 19 June 2019
<i>Standard Ref. & Requirement</i>	: 4.7.2 The entire operation may threaten the safety and health risks should be assessed. Measures and procedures to address the risks that have been identified should be documented and implemented. Entire precautions attached to the products should be monitored closely and applied to workers.		

Evidence observed (filled by auditor):

Dolok Sinumbah Estate and Balimbingan Estate have compiled the HIRAC document which explains that one of the controls for risk is to use the appropriate PPE when working. Both units have determined the types and specifications of PPE that are suitable for each activity.

However, based on field observations there are HIRAC that are not implemented, namely:

- 3 persons of agrochemical applicator in Balimbingan Estate are not use PPE (apron) but using the orange uniform which is absorbed and does not protect from chemical exposure to the body.
- The generator operator in Balimbingan Estate does not use safety shoes while working (using AP boot shoes)
- The chemical warehouse clerk in Dolok Sinumbah Estate uses leather and rubber gloves but the leather gloves have been damaged.
- Hoisting crane operators in mill do not use gloves.
- The sterilizer operator does not use PPE safety shoes (wearing PPE boots)
- Observed in Dolok Sinumbah Estate Block of 03U Afd III harvesting activities, the workers do not use glasses and gloves
- Interviews with Chemical operators and observed to the PPE storage in Dolok Sinumbah Afd III, known that the company provided PPE spray uniforms (uniform orange fabric), the uniform made from absorbing and not protecting from chemical exposure to the body

Non-Conformance Description:

Related to this, both business units have not been able to show evidence that the specified risk control plan has been implemented and monitored its effectiveness.

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

- There is no monitoring of the use and condition of PPE in accordance with the identification of the risks that have been made which are carried out on a monthly basis
- There is no PIC assigned to monitor the use and condition of PPE and the implementation of OSH in the operational area of the company

Correction *(filled by organization audited):*

- Completing the aprons for spraying officers in the Balimbingan Estate
- Completing the PPE of workers in the Balimbingan Estate and Dolok Sinumbah Estate in accordance with the identification of risks.
- Providing information on risk management (HIRAC) to workers

Corrective Action *(filled by organization audited):*

- Monitoring the use of PPE in accordance with the identification of the risks set by the company on a monthly basis
- Establish a PIC that is responsible for monitoring the use and condition of workers' PPE
- The company has a policy if there is a damaged PPE can be replaced by using a stock (spare) PPE that is intended for guests before the new PPE is given to workers.

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

Verification 28 May 2019

The Balimbingan Unit shows evidence of improvement including:

1. Minutes of socialization the use of PPE on April 10, 2019 in Afd I to IV followed by chemist foremen and workers, socialized types of PPE are used: helmet, safety shoes, safety boot, gloves, masks, glasses, earplugs, face shields and aprons, the PPE replacement mechanism that explains that replacement of damaged PPE is done based on the results of monitoring and reported to the manager for new replacements where checks and monitoring are conducted once a month and socialization attendance with 19 participants.
However, there is no evidence of socialization to all workers in all activities of the Balimbingan unit
2. The minutes of socialization the risk management (HIRAC) conducted on April 9 to workers and foremen in Afd I Balimbingan, the number of participants was 15 people.
There is no evidence that the HIRAC socialization has been carried out to all employees in all operational activities of Balimbingan Unit.
3. Evidence of evaluation of training and socialization of HIRAC, PPE and PPE replacement mechanism and evidence of the determination of special officers in monitoring PPE.
4. The results of PPE monitoring in technical activities, nursery, afdeling I, Afdeling III, Afdeling IV and Afd II of Balimbingan Estate on April 24, 2019. However, it has not been able to show evidence of evaluation of monitoring results and proof of replacement for all identified PPE damaged.

Dolok Sinumbah unit shows proof of improvement, including:

1. Identify personal protective equipment and OHS risk identification for the 2019 period for the processing unit, inform the type of work, identify hazards and the risks and types of PPE provided
2. Monitoring PPE in the Dolok Sinumbah POM processing unit in April 2019 types of safety shoes, helmets, masks, leather gloves, dust goggles, ear plugs, ear muffs, leather gloves, chemical glasses and aprons
3. Monitoring PPE for administration section period April 2019 (hazardous waste officers, material clerk, accounting staff, fertilizer / chemical warehouse officers, lubricant warehouse officers), PPE types: safety shoes, helmets, masks, gloves, glasses and aprons.

4. Monitoring of PPE for technical section in April 2019 (general workshop, electrical workshop, building)
5. Monitoring of PPE in estate for April 2019 in Afd I to afdeling V for PPE types: shoes, helmets, masks, gloves, glasses, aprons
6. Proof of request for replacement of damaged PPE, proof of purchase of PPE, and report on the replacement of PPE carried out on 12 April 2019 for estate and POM, types of shoes, gloves, glasses, boots, chemical masks, helmets, rubber gloves, leather gloves, dust goggles, chemical goggles and chemical apron.
7. Evidence of socialization of job risk identification on 12 April 2019 is followed by 50 POM employees and Evidence of HIRAC training evaluation and use of PPE on POM employees, but there is no evidence that socialization has been carried out to all POM and Estate employees.
8. Documents for determining the officer responsible for monitoring PPE in the Estate and POM, but have not yet shown the PPE monitoring schedule.

Based on the explanation, non-conformity is not yet closed.

Verification 13 June 2019

Both units can show proof of improvement in the form of:

1. Application document for the replacement of a damaged PPE from the chairman of P2K3 to the Balimbingan Manager on April 8, 2019 no. : letter BAL / P2K3 / 01 / IV / 2019; proof of purchase of PPE on May 13, 2019 types of boots, helmets, t-shirts, glasses, chemical aprons and safety shoes.
2. Evidence of monitoring the PPE of the Balimbingan employee conducted on April 24, 2019 in the engineering section, nursery, afdling IV, afdeling III, afdeling II and afdeling I, informing the type of PPE examined and the condition of the PPE.
 1. Attached proof of replacement of the identified PPE damaged and not present during monitoring, replacements made on May 15, 2019 in the engineering section, bibliography, department IV, counseling III, counseling II and counseling I, for example in the replacement technique 1 pair of safety shoes; on the bib replacement 2 pairs of boot shoes, 2 helmets and 1 glove; in replacement IV replacement 12 pairs of boot shoes, 13 helmet, 10 hand gloves; in afd III the replacement of 12 pair of boot shoes, 8 helmets, 10 gloves, and 5 glasses.
2. Proof of socialization of PPE documents to Balimbingan employees on April 10, 2019, evidence has been completed with training materials, photo documentation and attendance list: AFD I as many as 61 people, Afd II as many as 69 people, Afd III 72 people and IV IV 78 people.
3. Proof of socialization of risk identification documents to employees of POM and Estate on April 20, 2019 with a total of 97 participants. The evaluation of the training has been carried out with the results of the participants' level of understanding sufficiently good
4. SK special officer to monitor employee PPE no. DOS / M / Kpts / 03 / V / 2019 dated May 31, 2019, explained in the Decree that checks and monitoring are conducted once a month.

However, it has not been shown that the two units have stipulated provisions regarding the stock of PPE (spare) and proof of their physical stock being stocked as a backup if there is a replacement of the employee PPE that is damaged at any time.

Verified by : _____

<i>NCR No.</i>	: 2019.05	<i>Issued by</i>	: Sandra Purba
<i>Date Issued</i>	: 2 April 2019	<i>Time Limit</i>	: 1 July 2019
<i>NC Grade</i>	: Major	<i>Date of Closing</i>	: 13 June 2019
<i>Standard Ref. & Requirement</i>	: 4.7.3 Records of training Occupational Health and Safety program (see 4.8) and Personal Protective Equipment (PPE) in accordance with the results of hazard identification and risk analysis should be available to all workers.		

Evidence observed (filled by auditor):

In the collective labour agreement the company stated that the schedule for providing PPE to employees is once a year. The mechanism that regulates the replacement of PPE can be shown if damaged before the scheduled replacement period is listed in Manager Circular Letter (No: BAL / SE / Intern / 11/1/209 for Balimbingan and no .: DOS / SE / internal / 01 / I / 2019 for Dolok Sinumbah) which states that identification of damaged PPE is done through monitoring the completeness of PPE carried out every month by technical assistants, reported to HR assistants for PPE replacement, and PPE distribution to employees.

During document review, field observations and interviews with employees, auditor observed the following:

- The evidence of employee PPE monitoring has not been shown and interviews with the secretary of Balimbingan' OSH committee told that monitoring of damaged PPE is only done once a year during PPE replacement according schedule.
- Dolok Sinumbah estate shows evidence of PPE distribution on January 13, 2018, but it has not been shown the evidence of PPE distribution for 2019 to employees
- Dolok Sinumbah estate has not yet shown evidence of monthly PPE monitoring in all operational activities.
- Based on interviews with employees in Balimbingan Estate (harvesters and sprayers) said that the replacement of PPE is done once a year and there is no replacement of damaged PPE, told that the current safety shoes used procured by themselves)
- During field observations to mill, for example to scheduled waste storage and chemical warehouses, known that PPE of safety shoes was damaged (shoe soles have run out / thin) and interviews with mill employees such as lorry pullers say that they do not understand the mechanism of damaged PPE replacement (the hand gloves used when working is self-procuring)

Non-Conformance Description:

Regarding this, the company has not been able to show evidence that the company's mechanisms and policies have been implemented and monitored their effectiveness.

Root Cause Analysis (filled by organization audited):

- Insufficient understanding of workers about the mechanism for providing PPE by the company
- There is no monitoring of the use and condition of PPE in accordance with the identification of the risks that have been made which are carried out on a monthly basis
- There is no PIC assigned to monitor the use and condition of PPE and the implementation of OSH in the operational area of the company

Correction (filled by organization audited):

- Demonstrate the mechanism of PPE delivery / replacement
- Make monitoring of the condition of PPE used by workers in afdeling
- Provide information on the mechanism of PPE delivery / replacement

Corrective Action (filled by organization audited):

- Monitoring the use of PPE in accordance with the identification of the risks set by the company on a monthly basis.
- Establish a PIC that is responsible for monitoring the use and condition of workers' PPE
- Make socialization of the functions and uses of PPE to workers
- The company has a policy if there is a damaged PPE can be replaced by using a stock (spare) PPE that is intended for guests before the new PPE is given to workers

Assessor Evaluation and Conclusion (filled by auditor):

Verification 28 May 2019

Balimbangan Estate shows evidence of improvement including:

1. Minutes of socialization the use of PPE on April 10, 2019 in Afd I to IV followed by chemist foremen and employees, socialized types of PPE are: helmet, safety shoes, safety boot, gloves, masks, glasses, earplugs, face shields and aprons, the PPE replacement mechanism that explains that replacement of damaged PPE is done based on the results of monitoring and reported to the manager for new replacements, where checks and monitoring are conducted once a month and socialization attendance with 19 participants.
2. Evidence of evaluating the effectiveness of training and socialization of HIRAC, PPE and the mechanism of PPE replacement and proof of the socialization of special officers in monitoring PPE in the Balimbangan Estate with a total of 10 officers (equipped with duties and responsibilities).
3. The results of PPE monitoring in the technical activities, nursery, afdeling I, afdeling III, afdeling IV and Afd II of Balimbangan Estate on April 24, 2019.

However, there is no evidence of socialization to all workers in Balimbangan Estate.

There is no evidence that the HIRAC socialization has been carried out to all workers in Balimbangan Estate.

Not yet able to show proof of evaluation of monitoring results and proof of replacement for all identified PPE damaged.

Dolak Sinumbah Estate shows proof of improvement, namely:

1. Identification of personal protective equipment and OHS risk identification for period 2019 for the processing unit, informing the type of work, identification of hazards and the risks and types of PPE given
2. Monitoring PPE in the Dolok Sinumbah Estate processing unit in April 2019 types of safety shoes, helmets, ash masks, leather gloves, dust goggles, ear plugs, ear muffs, leather gloves, chemical glasses and aprons
3. Monitoring PPE for the administration section for April 2019 (hazardous waste warehouse officers, materials clerk, bookkeeping officer, fertilizer / chemical warehouse officers, lubricant warehouse officers), PPE types: safety shoes, helmets, masks, gloves, glasses and aprons.
4. PPE Monitoring on technical section in April 2019 (general workshop, electrical workshop, building).
5. Monitoring of PPE for field officer in April 2019 in Afd I to afdeling V for PPE types: shoes, helmets, masks, gloves, glasses, aprons.
6. Evidence of Dolok Sinumbah Estate establishment of investigation officers in Dolok Sinumbah Estate consist of 3 people in accordance with Manager Decree No. : DOS / P2K3 / Kpts / 02 / IV / 2019.
7. Evidence of socialization the functions of PPE use and the mechanism for replacing PPE on 13 April 2019 were followed by 14 POM workers, but there was no evidence that socialization had been carried out to all workers in mill and estate.
8. Appointment documents for officers who are responsible for monitoring PPE in the mill and estate of Dolok Sinumbah, but have not shown the PPE monitoring schedule.

There is evidence that is still less so, Non-conformities have not been fulfilled.

Verification 13 June 2019

Both units can show proof of improvement in the form of:

1. Documents for the application of a damaged PPE from the head of P2K3 to the Balimbangan Manager on April 8, 2019; proof of PPE purchase on May 13, 2019 types of boots, helmets, t-shirts, glasses, chemical aprons and safety shoes.
2. Evidence of PPE monitoring for Balimbangan Estate conducted on April 24, 2019 in the engineering section, nursery, Afdeling IV, Afdeling III, Afdeling II and Afdeling I, informing the type of PPE examined and the condition of the PPE.
Attached proof of replacement of the identified PPE damaged and not present during monitoring, replacements made on May 15, 2019 in the engineering section, nursery, Afdeling IV, Afdeling III, Afdeling II and Afdeling I, for example replacement in the technique section 1 pair of safety shoes; replacement 2 pairs of boot shoes, 2 helmets and 1 glove in nursery, replacement of 12 pairs of boot shoes, 13 helmet, 10 hand gloves in Afdeling IV; replacement of 12 pair of boot shoes, 8 helmets, 10 gloves, and 5 glasses in Afdeling III.
3. Proof of PPE socialization to Balimbangan workers on April 10, 2019, evidence has been completed with training materials, photo documentation and attendance list: Afd I as many as 61 people, Afd II as many as 69 people, Afd III as many as 72 people and Afdeling IV as many as 78 people.

4. Proof of socialization of risk identification to workers of POM and Estate on April 20, 2019 with a total 97 participants. The evaluation of the training has been carried out with the results of the participants understanding level is sufficient to great.
5. In the decree of the special officer to monitor employee PPE, explained that the officer must checks and monitor once a month.

All proof of improvement has been received so that nonconformity is closed

Verified by : **Sandra Purba**

<i>NCR No.</i>	: 2019.06	<i>Issued by</i>	: Sandra Purba
<i>Date Issued</i>	: 2 April 2019	<i>Time Limit</i>	: 1 July 2019
<i>NC Grade</i>	: Major	<i>Date of Closing</i>	: 19 June 2019
<i>Standard Ref. & Requirement</i>	6.1.3 There shall be a management plan and social impact monitoring to avoid or reduce negative impacts and enhance positive impacts were based on the analysis of social impact through the consultation process with the parties affected, documented and unscheduled including the responsibilities of implementation.		
<p><i>Evidence observed (filled by auditor):</i></p> <p>Balimbingan Unit shows social impact management programs for the 2018 and 2019 period which are prepared in consultation with various parties. Based on interviews with community representatives (sub-district head), there was an issue of the activities of the people who trade along the road around the company area (social jealousy between disciplined and unregulated trader).</p> <p><i>Non-Conformance Description</i></p> <p>In this regard, the company has not been able to show that all social issues and impacts have been identified, monitored and managed.</p>			
<p>Root Cause Analysis (filled by organization audited):</p> <p>The lack of understanding of officers in identifying problems and social issues that develop in the community around the plantation which is the basis for making the social impact analysis program in Balimbingan Estate.</p>			
<p>Correction (filled by organization audited):</p> <ul style="list-style-type: none"> • Include the issue of activities of the community that trades on the side of the road around the company's area (social jealousy between disciplined and unregulated trader) into the social impact management program of Balimbingan Estate. • Socialization to officer about the procedures for identifying and making a social impact management program that is in accordance with the social impact analysis. 			
<p><i>Corrective Action (filled by organization audited):</i></p> <p>Evaluate the understanding of officers after obtaining socialization on procedures for identifying and making a soisal impact management program that are in accordance with the social impact analysis.</p>			
<p><i>Assessor Evaluation and Conclusion (filled by auditor):</i></p>			

Verification 13 June 2019

Balimbingan Estate can show proof of improvement in the form of:

1. Report on training on how to prepare / program and evaluate social impact management programs as well as other document requirements for RSPO certification on May 16, 2019, followed by document controller of Dolok Sinumbah and Balimbingan, in the annex accompanied by a list the number of participants is 6 people.
2. Record of evaluation for document controller who attend training as many as 4 people in both units with the results of a good level of understanding
3. Program and realization of the management of social impacts 2019. However, Balimbingan Estate has not been able to show proof of identification of all issues of social impact caused and include them in management programs (including issues that the auditor has identified related to social jealousy between disciplined traders and unregulated trader). Non-conformity is not yet closed.

Verification 19 June 2019

Balimbingan Estate has shown the minutes and preparation of the SIA management plan that was conducted on April 9, 2019. The activity was attended by the Head of Tanah Jawa Sub-district, Head of Village Nagori Bah Kikat, communities and NGOs. Based on the document it is known that the social impacts managed include conflict with grazier and social jealousy between disciplined traders and unregulated trader. Based on the evidence of the improvement, the non-conformity is closed.

Verified by : **Sandra Purba**

<i>NCR No.</i>	: 2019.07	<i>Issued by</i>	: Rizliani Aprianita Hsb
<i>Date Issued</i>	: 2 April 2019	<i>Time Limit</i>	: 1 July 2019
<i>NC Grade</i>	: Major	<i>Date of Closing</i>	: 19 June 2019
<i>Standard Ref. & Requirement</i>	: 6.5.2 Collective Labor Agreement/Company Regulation, in accordance with the manpower regulations, shall be available in understandable language; and explained by the management or Labor Union to the workers.		
<i>Non-Conformance Description & Evidence observed (filled by auditor):</i>			
The result of a field visit at afdeling 3 block 96BF Balimbingan estate, found 2 harvesters' wives assisting harvesting activities in the field without any work ties/agreement. In addition, the results of interview with 3 harvesters were conveyed that harvesters brought their wives to pick up loose fruit. Based on the explanation, it was concluded that there was not enough evidence that all workers had work agreement in accordance with Law 13 of 2003.			
<i>Root Cause Analysis (filled by organization audited):</i>			
<ul style="list-style-type: none"> - Insufficient understanding of harvesters for regulations that apply in the company. - There is no monitoring mechanism to ensure that workers are not assisted by other people who do not have a working relationship with the company 			
<i>Correction (filled by organization audited):</i>			
<ul style="list-style-type: none"> - Prohibiting harvesters from doing work with the help of a family that has no relationship with the company. - Socialize to workers about the prohibition on using job assistants who have no relationship with the company. 			
<i>Corrective Action (filled by organization audited):</i>			
<ul style="list-style-type: none"> - Making circular letter / Policies that prohibit harvesters from assisting family members in harvesting activities. 			

- Conduct monitoring to ensure workers are not assisted by others who do not have a working relationship with the company.

Assessor Evaluation and Conclusion (filled by auditor):

Verification on May 24, 2019.

The company shows evidence of improvement in the form of:

- Minutes of socialization on April 13, 2019 related to Family Gang bans and use of underage workers attended by 17 participants. In the minutes it was explained that the prohibition on harvesting with a family gang system was not allowed to use family members who did not have work ties to assist in harvesting.

However, the company has not been able to show evidence of improvement in accordance with the corrective actions submitted in the form of:

- Absence of socialization to harvesters.
- Policy / prohibition to assist other people who do not have a working relationship with the company.
- Monitoring to ensure that workers are not assisted by others who do not have a working relationship with the company

Based on the explanation above, the discrepancies have not been fulfilled.

Verification on June 12, 2019.

The company shows evidence of improvement in the form of:

- Minutes of socialization related to the Family gang ban on April 10, 2019 in afdeling I and the attendance list of 61 workers including harvesters.
- Minutes of socialization related to the Family gang ban on April 10, 2019 in afdeling II and the list attendance of 68 workers including harvesters.
- Minutes of socialization related to the Family gang ban on April 10, 2019 in afdeling III and the list attendance of 71 workers including harvesters.
- Minutes of socialization related to the Family gang ban on April 10, 2019 in afdeling IV and the list attendance of 78 workers including harvesters.
- Records of monitoring harvesters for the period January - May 2019 for afdeling I - IV. Based on the monitoring, there were no harvesters assisted by family or other people who did not have a working relationship.
- Circular Letter No. BAL / SE / 19 / V / 2019 April 8, 2019.

All evidences have been received but field verification (major verification) is needed to ensure implementation has been carried out by business units.

Verified by : Rizliani Aprianita Hsb

<i>NCR No.</i>	: 2019.08	<i>Issued by</i>	: Rizliani Aprianita Hsb
<i>Date Issued</i>	: 2 April 2019	<i>Time Limit</i>	: 1 July 2019
<i>NC Grade</i>	: Major	<i>Date of Closing</i>	: 12 June 2019
<i>Standard Ref. & Requirement</i>	: 6.9.1 A policy to prevent sexual and all other forms of harassment and violence, shall be documented, implemented and communicated to all levels of the workforce.		

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

The results of interviews with management, gender committee / women's empowerment and verification of the document known that the company has a forum to handle with women's issues. The company also showed socialization related to handle women's issues, among others :

- Bahjambi : Minutes of socialization on handling women's issues in the Balimbingan estate on March 8, 2019 attended by 47 participants. The attendance list that is attached is February 18, 2019 with the agenda / topic of

<p>the social gathering IKBI.</p> <ul style="list-style-type: none"> - Dolok Sinumbah: Minutes of socialization on handling women's issues in Dolok Sinumbah estate on March 8, 2019 attended by 47 participants. <p>In the socialization minutes, the contents of the socialization points included the definition of sexual harassment, as well as prevention of sexual harassment, carried out by avoiding traveling at night and the code of conduct dressed neatly and behaving politely.</p> <p>The results of interview with 1 female worker in Balimbingan warehouse and 5 female workers (road maintenance) at afdeling III Dolok Sinumbah estate, it was found that female workers did not know the reporting mechanism regarding women's issues such as sexual harassment or sexual violence.</p> <p>Based on the explanation above, it was concluded that there was not enough evidence that the company had socialized the reporting mechanism regarding women's issues through gender committees / women's empowerment.</p>
<p>Root Cause Analysis <i>(filled by organization audited):</i></p> <p>Socialization activities have not been carried out for all existing female workers in the Balimbingan Estate and Dolok Sinumbah Estate.</p>
<p>Correction <i>(filled by organization audited):</i></p> <p>Re-socialize to workers who have not gained an understanding of the reporting mechanism regarding women's issues through gender committees / women's empowerment.</p>
<p>Corrective Action <i>(filled by organization audited):</i></p> <ul style="list-style-type: none"> - Make monitoring of socialization needs related to RSPO principles and criteria. - Conduct an evaluation regarding the understanding of workers after obtaining socialization about the reporting mechanism regarding women's issues through gender committees / women's empowerment.
<p>Assessor Evaluation and Conclusion <i>(filled by auditor):</i></p> <p>Verification on May 24, 2019 The company shows evidence of improvement in the form of:</p> <p>Dolok Sinumbah</p> <ul style="list-style-type: none"> - Minutes of socialization of sexual harassment at afdeling I-V Dolok Sinumbah Estate on April 20, 2019. In the minutes it was explained that if there were workers or female workers experiencing or witnessing sexual harassment to be reported to the Chair of the Gender Committee. The socialization was attended by 27 participants from afdeling I-V. - Work Program of the gender committee / section on women's empowerment in January 9, 2019, one of which includes socialization of prevention of sexual harassment. - Results of evaluating the socialization of women's issues to 26 workers along with training participant evaluation documents. Evaluation is carried out on 29 April 2019. - Monitoring of socialization related to RSPO and ISPO in 2019. <p>Blimbingan</p> <ul style="list-style-type: none"> - Minutes of socialization on the handling of women's issues on 9 April 2019 attended by 20 participants consisting of female workers and housewives. In the minutes it is explained if there are reports related to sexual abuse, reported through the Labor Union (SPBUN) women's empowerment section of the Balimbingan base. - Evaluation of trainees (2 workers) conducted on May 8, 2019. - The training evaluation recapitulation form for 12 female workers consisted of HR Staff, Afdeling Staff, etc. - Monitoring of socialization related to RSPO and ISPO in 2019.

Verification on June 12, 2019

Based on the clarification of the root cause analysis, correction, and corrective actions have been accepted by the auditor.

All evidences have been received but field verification (major verification) is needed to ensure implementation has been carried out by business units.

Verified by : **Rizliani Aprianita Hsb**

<i>NCR No.</i>	: 2019.09	<i>Issued by</i>	: Sandra Purba
<i>Date Issued</i>	: 2 April 2019	<i>Time Limit</i>	: 1 July 2019
<i>NC Grade</i>	: Major	<i>Date of Closing</i>	:
<i>Standard Ref. & Requirement</i>	: SCCS General Chain of Custody 5.3.1 The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified		
Evidence observed <i>(filled by auditor):</i>			
Based on document review, interview results and field visits, it is known that there is no CSPO / CSPK stamp in FFB weighbridge ticket.			
Non-Conformance Description <i>(filled by auditor):</i>			
This is not in accordance with the Basic Guidance and Work Instruction of Certified Palm Oil Product Handling (document number 04.03/KS/SUS/P/001 approved since 1 August 2018) which explain every FFB weighbridge ticket must complete with CSPO / CSPK stamp.			
Root Cause Analysis <i>(filled by organization audited):</i>			
<ul style="list-style-type: none"> • There is no evaluation of the application of SOP in the field • Insufficient understanding of officers in implementing procedures that have been made 			
Correction <i>(filled by organization audited):</i>			
<ul style="list-style-type: none"> • Implement SOP in the field • Conducting SOP socialization to officers related to the implementation of SCCS 			
Corrective Action <i>(filled by organization audited):</i>			
<ul style="list-style-type: none"> • Conduct SOP evaluations according to implementation in the field • Evaluating officers' understanding of the socialization that has been given 			
Assessor Evaluation and Conclusion <i>(filled by auditor):</i>			
Verification 21 May 2019			
Dolok Sinumbah POM has socialized SCCS to the weighbridge operator, production clerk and delivery clerk on 11 April 2019. The material presented included the provision of stamps on the consignment note and weighbridge ticket of both FFB, CPO and PK. In addition, the management unit has also shown examples of the application of stamps on the weighbridge ticket and evaluation related to the socialization that has been carried out. This is in accordance			

with the SOP that is owned, so that non-conformity is closed.

Verified by : **Sandra Purba**

NCR No.	: 2019.10	Issued by	: Sandra Purba
Date Issued	: 2 April 2019	Time Limit	: 1 July 2019
NC Grade	: Major	Date of Closing	:
Standard Ref. & Requirement	: SCCS General Chain of Custody 5.9.1 The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements		
Evidence observed (filled by auditor):			
<p>Dolak Sinumbah POM has record production and delivery of RSPO certified products for the period April 2018 to March 2019. Based on these records it is known:</p> <ul style="list-style-type: none"> • Production of Dolok Sinumbah Certified FFB for April 2018 is calculated from 1 April 2018, while Dolok Sinumbah Estate get RSPO certificates on 3 April 2018. • Production of Balimbangan certified FFB is calculated from 1 April 2018, while the Balimbangan Estate receives RSPO certificates on 5 June 2018. • Production of FFB from Dolok Sinumbah Estate (Block 09B) has not been calculated as RSPO non-certified products. • In July 2018 and January 2019 there were receipts of FFB from estate that had not yet received RSPO certificates, but in the recordings there was no production of certified products (CPO and PK). 			
Non-Conformance Description (filled by auditor):			
The recordings shown are not accurate and complete.			
Root Cause Analysis (filled by organization audited):			
The lack of understanding of officers in making reports / records of SCCS monitoring in accordance with the provisions contained in the certificate (both the date of entry and the area included in the scope of the certification)			
Correction (filled by organization audited):			
<ul style="list-style-type: none"> • Revise records of SCCS monitoring of certified products in accordance with the date the certificate is issued and the area included in the scope of the certification • To socialize the procedures for making monitoring / recording of certified / SCCS products 			
Corrective Action (filled by organization audited):			
<ul style="list-style-type: none"> • Evaluate the understanding of officers after obtaining socialization / training on recording procedures / SCCS monitoring • Evaluate the SCCS recording / monitoring that has been made by the officer 			
Assessor Evaluation and Conclusion (filled by auditor):			
Verification 21 May 2019			
Dolak Sinumbah POM has socialized SCCS to weighbridge operator, production clerk and delivery clerk on 11 April			

2019. The material presented included the method of making certified product data monitoring inputs. In addition, the management unit has also shown evaluations related to the socialization that has been carried out.

Dolok Sinumbah POM has shown SCCS monitoring records, but in the monitoring data it is known that certified products for Dolok Sinumbah Estate are calculated since 1 April 2018, while Dolok Sinumbah Estate received RSPO certificates since 2 April 2018. For Balimbingan Estate, based on monitoring data it is known that certified products are calculated from 3 June 2018, while Balimbingan Estate obtains RSPO certificates since 5 June 2018. The management unit has not been able to show evidence related to accurate and complete records, so that nonconformity is not yet closed.

Verification 11 June 2019

Dolok Sinumbah POM has shown record of SCCS monitoring which informs about FFB received, FFB processed, CPO production and PK production. Based on monitoring data, it is known that certified products for Dolok Sinumbah Estate are calculated since 2 April 2018 and for Balimbingan Estate are calculated since 5 June 2018. Based on evidence, non-conformity is closed.

Verified by : **Sandra Purba**

3.5.3. Opportunity for Improvement

No	Ref. Std.	Description
1	2.2.2	Ensure the implementation / realization of improvements and additions to the HGU pillar in accordance with the 2019 budget.
2	1.1.1 and 6.2.2	Recording and recapitulation of communication letters and stakeholder consultation in more detail.
3	6.5.1	Giving salary slips to employees
4	6.6	Selection mechanism for central union management
5	8.1.1	Adjustment of all implementations of the 2018 generic RSPO principles and criteria.

3.5.4. Noteworthy Positive Components

No	Ref. Std.	Description
1		The company has obtained ISPO (Indonesian Sustainable Palm Oil) certificate for both Dolok Sinumbah and Balimbingan business units.

3.6 Summary of Arising Issues from Public and Auditor Verification

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Labor Agency of Simalungun Regency Section head of the work requirements</p> <ul style="list-style-type: none"> - The Companies have implemented the payment of wages for employees refers to North Sumatera Governor Decree. - The company has a Collective Labor Agreement periode of 2018 - 2019 between PT Perkebunan Nusantara IV and the Executive Board of Workers Union. The Collective Labor Agreement has been registered to Labor Agency of Simalungun Regency. - All mandatory reports related to employment have reported well. - There are no issues of migrant workers, no child workers, no substitution contracts, no labor trade or forced labor forms. - All employees have employment agreements and there were no issues or violations committed by Companies related to worker welfare included in payment. 	<p>It has been verified and stated under principle 6 in the report</p>
<p>Agriculture Agency of Rokan Hulu Regency Head of Plantation</p> <ul style="list-style-type: none"> - Assessment of plantation business was carried out in May 2018 with class 2 results - There are no issues related to disruption of plantation business - The Communication goes well, all mandatory reports related to plantation operation have reported well. - There is no issues of land fires and Tools and fire brigade personnel are sufficient. - The company has been doing CSR activities in the field of education, regional development. - Company receiving FFB from third parties are not from the smallholder scheme so they are not required to use prices set by the local government 	<p>It has been verified and stated under Criteria 1.1; 2.1; 4.7; and 6.10 on The report</p>
<p>Environmental Agency of Rokan Hulu Regency Section head of the environmental monitoring</p> <ul style="list-style-type: none"> - The company already has a Schedule Waste Storage license in Mill and Estate. - The Communication goes well, all mandatory reports related to plantation operation have reported well - The companies have all environment permit. - There are no complaints of environmental pollution caused by operational companies on the public. - There is an indication that the company is planting in the 	<p>It has been verified and stated under principle 5 on The report</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> - river border when replanting - The government routinely monitors water quality every 6 months and air quality every year 	
<p>Labor Unions (Balimbingan and Dolok Sinumbah)</p> <ul style="list-style-type: none"> - There is no negative issues such as discrimination, the use of labor under 18 years, sexual abuse issues and others. - Providing wages and overtime in compliance with applicable regulations. Wage adjustments in 2019 will be included in April payroll. - There is no contract workers in Balimbingan and Dolok Sinumbah. All workers are permanent workers and workers who are still in probation / orientation who have work agreements or letters of appointment. - Workers who are still in probation / orientation are given the same rights as permanent workers. - There were no work accidents (fatality) in 2018. - All employees have been included in the program BPJS employment and health. - The Company has conducted periodic health checks to workers with high risk potential. - The Company has also provided PPE which is provided for free. 	<ul style="list-style-type: none"> - Has been described in criterion 6.5. - Has been described in indicator 6.5.1 - Has been described in indicator 4.7.5. - The company has paid labour social insurance and labour health insurance for all workers as written in indicator 4.7.6. - Has been described in indicator 4.6.11. - Has been described in indicator 4.7.3
<p>Gender Committee (Balimbingan and Dolok Sinumbah)</p> <ul style="list-style-type: none"> - There is no negative issues such as discrimination and sexual abuse or child labor. - Management of the gender committee has the program associated with sexual harassment policies, protection of reproductive rights. Socialization also includes a ban on pregnant and lactating women to spray. Socialization is delivered through meetings like recitation etc. 	<ul style="list-style-type: none"> - According o document verification and interview with workers, there was n issues related to violation of the rights of woman. - From the results of interviews with workers, the company has implemented of Company Policies such as reproductive rights and prohibition of pregnant woman to spray. It refer to criterion 6.9
<p>Local Contractor</p> <ul style="list-style-type: none"> - Company had socialized policies such as corporate codes and the use of labor over 18 years. - Contractor's workers has given APD by the contractors and company. - The entire execution of the work and payment in accordance with the applicable agreement. - Workers has been registered in health insurance (BPJS) and wages is above provincial minimum wages. - There is no complaint from contractor. 	<p>Based on document verification, show that the rights and obligation of each party has been set in the contract.</p>
<p>Balimbingan Villager (religious leaders)</p> <ul style="list-style-type: none"> - Contributions: religious assistance such as monthly recitation, fostering children, improving the economy. 	<p>There is no negative issue. The CH has been comply with criteria 2.2, 5.5, 6.1, 6.2, 6.3, 6.5, 6.11,6.12 and.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> - There is no negative impact felt by the community. - There is no fire issue - Good communication between the community and company workers - No complaints from the public - There are no workers who bring the family in the field - There are no human rights issues - There has been no issue of land conflict for the past year. 	6.13
<p>Marubun Jaya (Head of Village) and Totap Majawa (Head of Village)</p> <ul style="list-style-type: none"> - There were no negative issues due to the company's operations, but ever informed about the flood problems that occurred in the Totap Majawa region and assisted by Marihat Estate. - There is no administrative area included in the Balimbingan Estate. - For correspondence, the company always replies - Contributions given by the company are scholarships and the assistance of art tools (<i>rabana</i>), CSR. - Assistance for government operational activities - The land use loan application for the public health facility (<i>puskesmas</i>) has been submitted to the leadership, but the information must be from the Regent who submitted the application. - There is no issue of child labor and family-assisted workers - There is no discrimination issue. 	There is no negative issue. The CH has been comply with criteria 6.2, 6.7 and 6.11
<p>Hatonduhan Sub-district and Tanah Jawa Sub-district</p> <ul style="list-style-type: none"> - Contributions that have been given to roads maintenance and dikes. - Complaints related to livestock have been conveyed either from the community or the Balimbingan Estate, because it was not synergized. The sub-district has recorded the people who own livestock around the Balimbingan Estate. The hope is that the estate and the community that owns the livestock can work together, as the estate informs the area that will be poisoned to the community. - No other cases have been reported - There are no cases of land conflicts in Hatonduhan District - There are no environmental pollution issues - Communication with the community is good - There is no issue of land fire. - There are only 3 cases that often occur in the Sub-district of Tanah Jawa, namely livestock, sand quarry and stalls on the roadside. The three cases are illegal activities 	There is no negative issue. The CH has been comply with criteria 2.2, 5.1, 5.5, 6.1, 6.2 and 6.11.

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>carried out by the community. For these three things, the sub-district authorities have collected data.</p> <ul style="list-style-type: none"> - Information from online media revealed that there were cases of demolition of community stalls on the roadside in the area of HGU PTPN IV Balimbingan Estate. Based on the explanation from the sub-district head, it was known that the road was a provincial road which had been released from the HGU and that there was a trench near the road, while the demolished community shop was built through a ditch (entered into the HGU) so that it had to be dismantled. 	
<p>Village of Dolok Sinumbah, Village of Marihat Bandar and Village of Timba'an.</p> <ul style="list-style-type: none"> - Good communication and no negative issues - Are willing to be open with the community / transparent - Community development is also carried out by companies such as office repairs - There is an employee recruitment process carried out by the company - A lot of assistance is related to religion - Sports coaching activities have started less, please improve - There are already several piece workers who are appointed as permanent employees - There is no issue of child labor - There are no cases of discrimination - There is no land conflict because the area is limited by natural boundaries such as rivers - Not a social issue - Assistance that has been provided includes mosque minarets, fish seeds and road maintenance 	<p>There is no negative issue. The CH has been comply with criteria 6.1 6.2, 6.5, 6.7 and 6.11.</p>

4.0 CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY**4.1 Formal Sign-off of Assessment Findings**

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.

Signed on behalf of:

PT. Perkebunan Nusantara IV
Vice President Strategic Planning



Khayamuddin Panjaitan
19 June 2019

Mutuagung Lestari
Lead Auditor



Sandra Purba
19 June 2019

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.	National Land Agency	District of Simalungun	-	Interview	1 April 2019	√	
2.	Labor Agency	District of Simalungun	-	Interview	1 April 2019	√	
3.	Plantation Agency	District of Simalungun	-	Interview	1 April 2019	√	
4.	Environmental Agency	District of Simalungun	-	Interview	1 April 2019	√	
5.	WWF	-	wwf-indonesia@wwf.or.id	Email	22 March 2019		√
6.	Wahana Lingkungan Hidup	-	informasi@walhi.or.id	Email	22 March 2019		√
7.	Sawit Watch	-	info@sawitwatch.or.id	Email	22 March 2019		√
8.	Dolok Sinumbah POM <ul style="list-style-type: none"> • WWTP : 1 operator • Solid Waste Area : 1 operator • Chemical Material Warehouse : 1 worker • Workshop : 2 worker • Schedule Waste Storage : 1 worker • WTP : 1 operator 	Village of Dolok Sinumbah, Sub District of Hutabayu Raja, District of Simalungun		Interview	1 April 2019	√	
9.	Dolok Sinumbah Estate <ul style="list-style-type: none"> • Harvesting : 4 harvesters • Road Maintenance : 1 foreman • HGU Pole : 1 staff and 1 worker 	Village of Dolok Sinumbah, Sub District of Hutabayu Raja, District of Simalungun		Interview	1 April 2019	√	
10.	Balimbangan Estate <ul style="list-style-type: none"> • Circle and Path Spraying : 5 workers • Harvesting : 6 workers • Road Maintenance : 1 foreman and 4 workers • Slope Area : 1 worker • HGU Pole : 1 staff and 1 worker • Riparian Area : 1 staff • Chemical Storage : 1 worker • Fertilizer Storage : 1 worker • Fuel Storage : 1 worker • Schedule Waste Storage : 1 worker 	Sub District of Hutabayu Raja, District of Simalungun		Interview	30 March 2019	√	

	<ul style="list-style-type: none"> • Fire Fighter Warehouse : 4 worker • Workshop : 1 worker and 2 operators. 						
11	Balimbangan Villager (religious leaders)	District of Simalungun	-	Interview	1 April 2019	√	
12	Marubun Jaya (Head of Village) and Totap Majawa (Head of Village)	District of Simalungun	-	Interview	1 April 2019	√	
13	Hatonduhan Sub-district and Tanah Jawa Sub-district	District of Simalungun	-	Interview	1 April 2019	√	
14	Village of Dolok Sinumbah, Village of Marihat Bandar and Village of Timba'an	District of Simalungun	-	Interview	1 April 2019	√	

Appendix 2. Assessment Program

DATE		29 March – 2 April 2019	
PLANNED TIME	ACTUAL DURATION	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Friday, 29 March 2019			
05.30 – 09.00		Jakarta – Medan (KNO)	ARD
09.00 – 14.00		KNO – Tebing tinggi – Kebun Balimbingan	All Auditor
14.00 – 15.00		Opening Meeting	All Auditor
15.0 – 17.00		Document Verification <ul style="list-style-type: none"> - Basic Information, TBP and partial certification - Land Use Legality, Social/Conflict, Social/Worker Right & SCCS - Environmental, Conservation Aspect, GHG Emission & Planning - Best Management Practices, Health/Safety, & Transparency Information 	All Auditor
Saturday, 30 March 2019			
08.0 – 12.00		Field Observation to Balimbingan Estate <ul style="list-style-type: none"> - Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) & Implementation of Occupational Health & Safety Aspect - Implementation of Environmental, Conservation and Waste Management Aspect (Domestic Waste Management, Fire Control Facilities and HCV Area). - Implementation of Legal Aspect (Land Ownership, Legal Boundaries) - Implementation of Social Aspect (Communication and Transparency, Procedure and Mechanism of Complaint and Grievance) - Observation of Workers Facilities (Housing, School, Worship Place, Clinic, etc); Stakeholder Consultation with Labour, Union, Gender committee - Stakeholder Consultation to surrounding villges of Balimbingan dan Dolok Sinumbah (villages sample determined on site); & Local Contractor 	YYT BPA SDP RAH ARD
12.00 – 14.00		Break	All Team
14.00 – 17.00		Clarification of Field Visit & Completing of Check List	All Team
17.00 -		Balimbing → Dolok Sinumbah	All Team
Sunday, 31 March 2019			
		Day Off	
Monday, 1 April 2019			

08.0 – 12.00		<p>Field Observation to Dolok Sinumbah POM</p> <ul style="list-style-type: none"> - SCCS Verification (security and WB station); Production/Processing and Health & Safety ; Emergency Equipment Check & Emergency Team Interview - Hazardous Waste Storage, POME + Land Application; Management of Environment (Environment monitoring station & GHG, etc); Facilities (Housing, health clinic, clean water, etc); Worker Rights (Status, Payment Condition, Gender Aspect, etc) <p>Field Observation to Balimbingan Estate</p> <ul style="list-style-type: none"> - Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) & Implementation of Occupational Health & Safety Aspect; Implementation of Legal Aspect (Land Ownership, Legal Boundaries) - Implementation of Environmental, Conservation and Waste Management Aspect (Domestic Waste Management, Fire Control Facilities and HCV Area); Implementation of Social Aspect (Communication and 	<p>ARD</p> <p>RAH</p> <p>SDP</p> <p>BPA</p>
12.00 – 14.00		Break	All Team
14.00 – 17.00		Clarification of Field Visit & Completing of Check List	All Team
Tuesday, 2 April 2019			
07.00 – 08.00		Closing meeting preparation (internal discussion)	
08.00 -11.00		Closing Meeting	All Team
12.00 –		Traveling from Dolok Sinumbah → KNO → Jakarta	All Team