

Roundtable on Sustainable Palm Oil Certification R S P O

[✓] Surveillance

Name of Management : **Sungai Rungau Mill, PT Binasawit Abadipratama subsidiary of Golden Agri Resources Ltd.**
 Organisation
 Plantation Name : Sungai Rungau Estate, Terawan Estate, Sungai Seruyan Estate, Tangar Estate and Bukit Tiga Estate
 Location : Rungau Raya Village, Danau Seluluk Sub District, Seruyan District, Kalimantan Tengah Province, Indonesia
 Certificate Code : **MUTU-RSPO/029**
 Date of Certificate Issue : **26 August 2018** Date of License Issue : **26 August 2019**
 Date of Certificate Expiry : **25 August 2023** Date of License Expiry : **25 August 2020**

Assessment	Assessment Date	PT Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-1.1	20 to 24 May 2019	Andi Pratama Pasaribu, Mohamad Amarullah, Steve Mualim and Rindu Rezza Galih Rachmansyah	Octo H.P.N. Nainggolan	Ardiansyah

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-1.1	16 August 2019

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 on March 12th, 2014 with registration number **ASI-ACC-055**

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FIGURE

Figure 1. Location Map of PT Binasawit Abadipratama

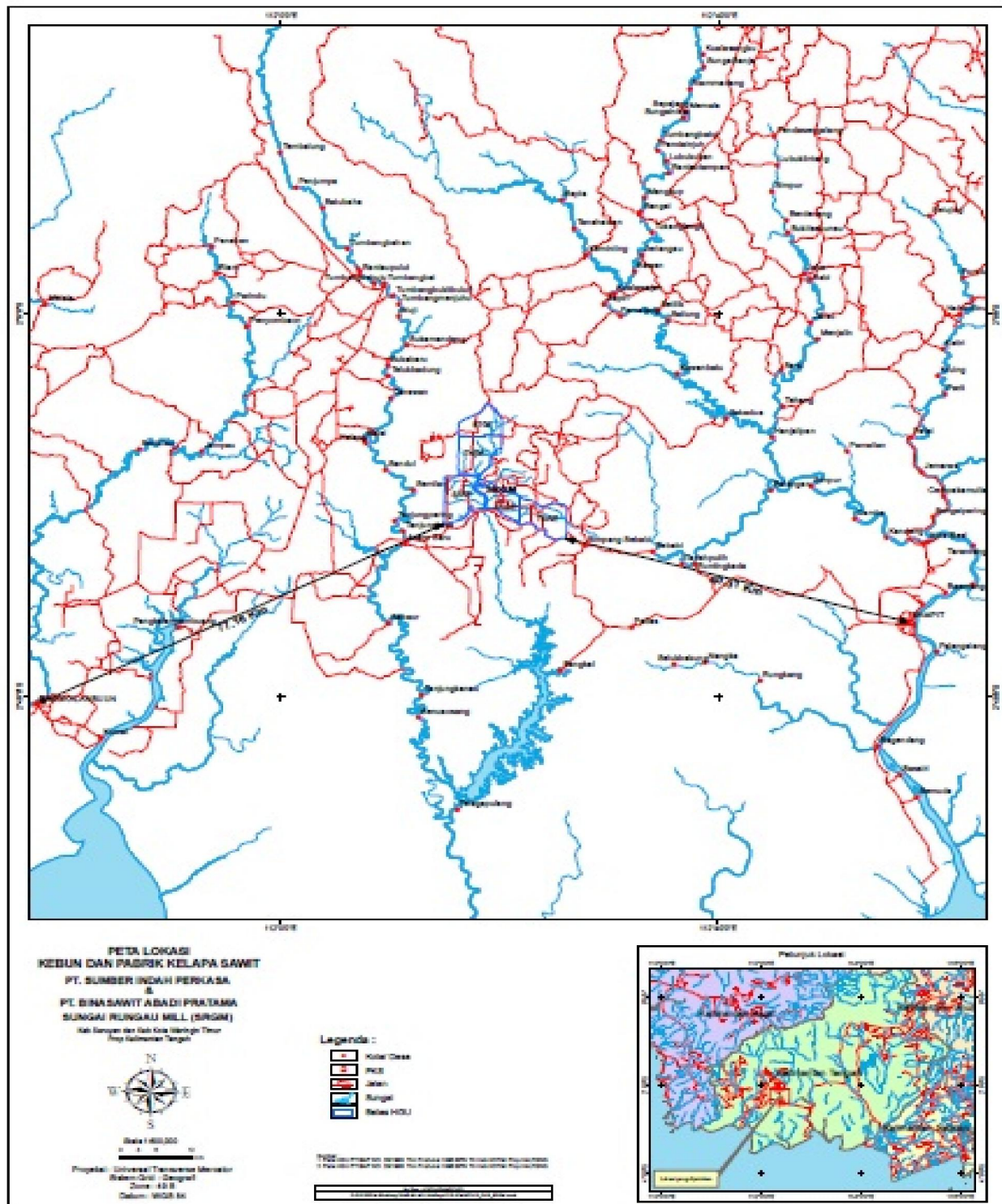
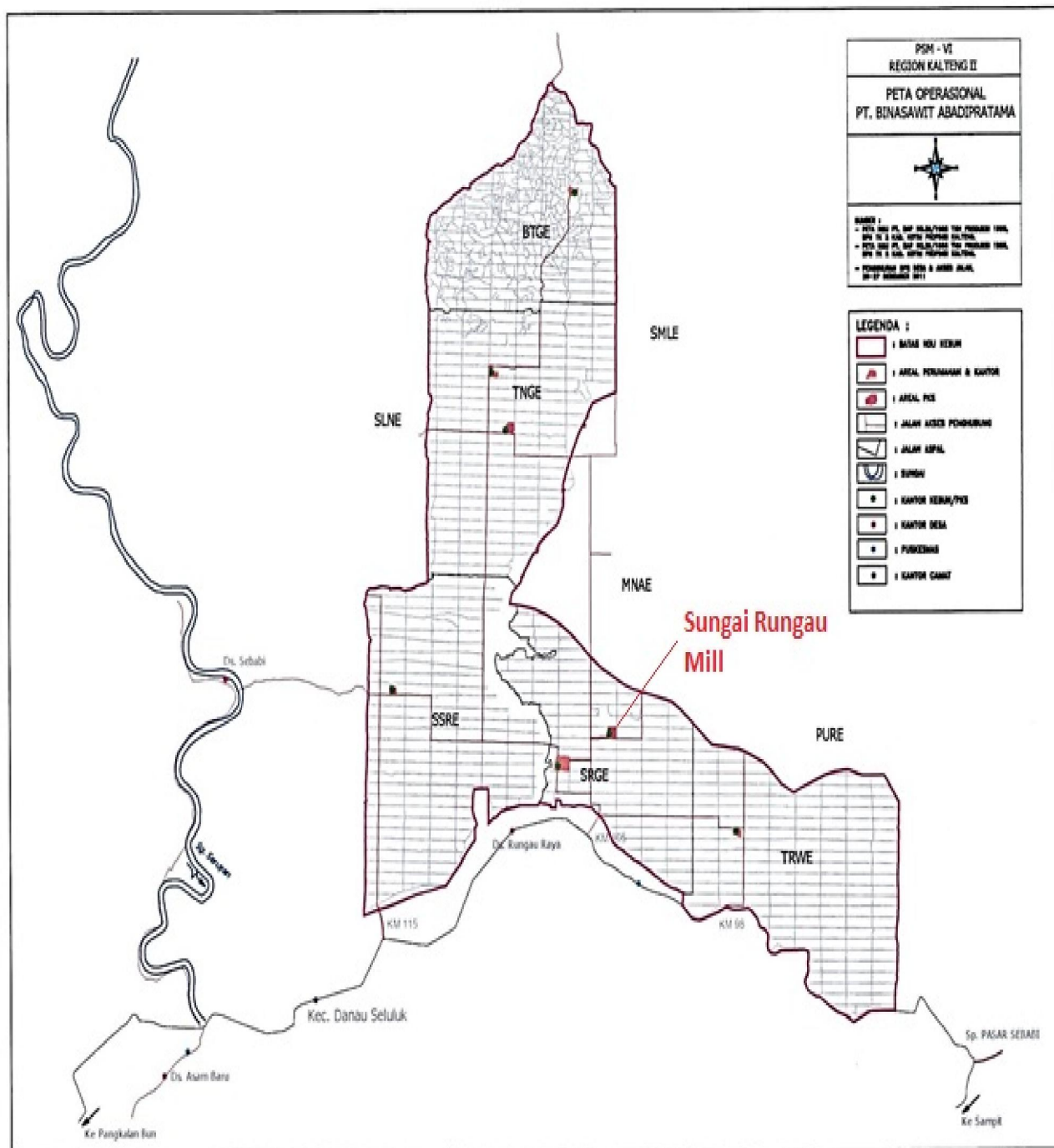


Figure 2. Operational Map of PT Binasawit Abadipratama



Glossary

ASA	: Annual Surveillance Assessment
AKAD	: <i>Angkatan Kerja Antar Daerah</i>
BAP	: Binasawit Abadipratama
BPJS	: <i>Badan Penyelenggara Jaminan Sosial</i> (Social Assurance of Labor)
BPJN	: <i>Badan Pertanahan Nasional</i>
BOD	: Biological Oxygen Demand
CH	: Certificate Holder
CLA	: Collective Labor Agreements
CPO	: Crude Palm Oil
CSR	: Corporate Social Responsibility
CITES	: Convention on International Trade in Endangered Species of Wild Fauna and Flora
EIA	: Environment Impact Assessment
EFB	: Empty Fruit Bunch
FFB	: Fresh Fruit Bunch
FPIC	: Free Prior Informed and Consent
GAR	: Golden Agri Resources
GHG	: Greenhouse Gas
GSEP	: Golden Agri Resources Social Environment Policy
HCV	: High Conservation Value
HGU	: <i>Hak Guna Usaha/ Land Use Tittle</i>
HRD	: Human Resource Division
HIRAC	: Hazard Identification and Risk Assessment
IDR	: Indonesian Rupiah
ILO	: International Labor Organizations
IPM	: Integrated Pest Management
ISCC	: International Sustainability & Carbon Certification
ISPO	: Indonesian Sustainable Palm Oil
IUP	: <i>Izin Usaha Perkebunan</i> (Plantation Operation Licence)
LUCA	: Land Use Change Analysis
MCAR	: Management Committee Agronomy and Research
MSDS	: Material Safety Data Sheets
OER	: Oil Extraction Rate
OHS	: Occupational Health and Safety
OIA	: Operational Internal Audit
P2K3	: <i>Panitia Pelaksana Kesehatan dan Keselamatan Kerja</i> (OHS Guiding Committee)
PIC	: Person In Charge
PK	: Palm Kernel
PKB	: <i>Perjanjian Kerja Bersama</i>
POME	: Palm Oil Mill Effluent
PMNP	: Plantation Monitoring and Planning
PPE	: Personal protective equipment
PSM	: <i>Perkebunan Sinarmas</i> (Sinarmas Plantation)
RC	: Regional Control
RKL/RPL	: <i>Rencana Pengelolaan Lingkungan / Rencana Pemantauan Lingkungan</i> (Environment Management and Monitoring Plan)
RSPO	: Roundtable Sustainable Palm Oil
RSUD	: Rumah sakit umum daerah / regional hospital
RTE	: Rare, Threatened and Endangered
SCCS	: Supply Chain Certification Standard
SIA	: Social Impact Assessment
SMARTRI	: SMART Research Institute

SMD	:	Senior Managing Director
SOP	:	Standart Operating System
SPO	:	Sustainable Palm Oil
SPM	:	<i>Serikat Pekerja Mandiri</i>
SRGE	:	Sungai Rungau Estate
SRUM	:	Sungai Rungau Mill
SSRE	:	Sungai Seruyan Estate
SIP	:	<i>Sumber Indah Perkasa</i>
TNGE	:	Tangar Estate
TRWE	:	Terawan Estate
WTP	:	Water Treatment Plant
WWTP	:	Waste Water Treatment Plant
VPA	:	Vice President Agronomy
VPM	:	Vice President Mill

1.0 SCOPE OF THE CERTIFICATION ASSESSMENT					
1.1 Assessment Standard Used		<ul style="list-style-type: none"> • Indonesian National Interpretation of RSPO P&C 2013 by INA-NITF (Indonesian National Interpretation Task Force) July 2016, endorsed by the RSPO BoG 30th September 2016. • RSPO Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014 revised on 14 June 2017 (Module D / E for CPO Mill) • RSPO Certification System for Principles and Criteria, 14 June 2017 			
1.2 Organisation Information					
1.2.1	Organisation name listed in the certificate	PT Binasawit Abadipratama subsidiary of Golden Agri Resources, Ltd			
1.2.2	Contact person	Ismu Zulfikar			
1.2.3	Organisation address and site address	Head Office : 108 Pasir Panjang Road, #06-00 Golden Agri Plaza, Singapore 118535 Indonesia Liaison Office : Sinar Mas Land Plaza, Tower II, 30th Floor Jl. MH Thamrin No. 51, Jakarta 10350, Indonesia Phone: +62-21-5033 8899. Fax: +62-21-5038 9999			
1.2.4	Telephone	+6221 50338899 ext 1184			
1.2.5	Fax	+6221 50389999			
1.2.6	E-mail	ismu.zulfikar@sinarmas-agri.com			
1.2.7	Web page address	www.goldenagri.com.sg			
1.2.8	Management Representative who completed the application for certification	Ismu Zulfikar (Head of Environmental Department)			
1.2.9	Registered as RSPO member	31 March 2011 (1-0096-11-000-00)			
1.3 Type of Assessment					
1.3.1	Scope of Assessment and Number of Management Unit	Sungai Rungau Mill and its supply bases (Sungai Rungau Estate, Terawan Estate, Sungai Seruyan Estate, Tangar Estate and Bukit Tiga 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 <table border="1"> <tr> <td>Latitude</td> <td>Longitude</td> </tr> </table>	Latitude	Longitude
Latitude	Longitude				

	Sungai Rungau	Rungau Raya Village, Danau Seluluk Sub district, Seruyan District, Kalimantan Tengah Province, Indonesia	S 02° 19' 14"	E 112° 20' 02"
1.4.2	Location of Certification Scope of Supply Base			
	Name of Supply Base	Location	Coordinate	
			Latitude	Longitude
	Sungai Rungau Estate	Rungau Raya Village, Danau Seluluk Sub district, Seruyan District, Kalimantan Tengah Province, Indonesia	S 02° 19' 43"	E 112° 18' 58"
	Sungai Seruyan Estate	Rungau Raya Village, Danau Seluluk Sub district, Seruyan District, Kalimantan Tengah Province, Indonesia	S 02° 18' 32"	E 112° 15' 28"
	Terawan Estate	Selunuk Village, Seruyan Raya, Seruyan Sub district, Kalimantan Tengah Province, Indonesia	S 02° 20' 43"	E 112° 22' 43"
	Tangar Estate	Rungau Raya Village, Danau Seluluk Sub district, Seruyan District, Kalimantan Tengah Province, Indonesia	S 02° 13' 45"	E 112° 17' 34"
	Bukit Tiga Estate	Rungau Raya Village, Danau Seluluk Sub district, Seruyan District, Kalimantan Tengah Province, Indonesia	S 02° 11' 01"	E 112° 19' 20"
1.5	Description of Area Statement			
1.5.1	Tenure			
	• State		20,152.79	Ha*
	• Community		-	Ha
1.5.2	Area Statement			
	• Total area		20,152.79	Ha
	• Mature area		18,082.87	Ha
	• Immature area		-	Ha
	• Mill and Buildings		181.39	Ha
	• Roads		708.14	Ha
	• Drainage canals and swamp		274.06	Ha
	• Air Strip		38.74	Ha
	• Others (unplantable)		246.97	Ha
	• HCV Area		620.62	Ha
	Note: There is Conservation area where included on planted area for about 882.38 ha.			
1.6	Planting Year and Cycles			

1.6.1	Age profile of planting year						
	Planting Year	Hectarage (Ha)					
		Sungai Rungau Estate	Sungai Seruyan Estate	Terawan Estate	Tangar Estate	Bukit Tiga Estate	Total
	1996	-	244.65	852.98	-	-	1,097.63
	1997	490.48	1,653.65	883.41	330.39	-	3,357.93
	1998	621.20	1,057.78	1,283.60	1,406.25	486.13	4,854.96
	1999	582.05	1,223.95	360.73	751.60	608.87	3,527.20
	2000	931.23	-	934.81	1,041.53	84.72	2,992.29
	2001	183.78	-	-	84.98	343.04	611.80
	2004	-	-	-	148.41	413.33	561.74
	2005	71.03	-	-	158.36	791.34	1,020.73
	2006	-	-	12.38	-	-	12.38
	2007	-	-	-	46.21	-	46.21
	TOTAL	2,879.77	4,180.03	4,327.91	3,967.73	2,727.43	18,082.87
1.6.2	New Planting area after January 2010			- Ha			
1.6.3	Planting Cycle			1 st Cycle			
1.7	Description of Mill and Supply Base						
1.7.1	Description of Mill						
	Name of Mill	Capacity (tonnes/hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel	
				Out put (ton)	Extraction (%)	Out put (ton)	Extraction (%)
	Sungai Rungau	80	452,525.98	95,937.42	21.20	25,060.33	5.54
	<i>*Production data source from May 2018 to April 2019 (the gap of FFB processed and received for about 297.68 ton were came from FFB stock before May 2018).</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)	%
	Sungai Rungau	3,073.15	2,879.77	92,133.24	31.99	91,883.50	99.73
	Sungai Seruyan	4,870.84	4,180.03	107,421.13	25.69	107,078.190	99.68
	Terawan	4,481.87	4,327.91	117,552.54	27.16	93,088.40	79.19
	Tangar	4,445.15	3,967.73	130,439.62	32.87	129,601.49	99.36
	Bukit Tiga	3,281.78	2,727.43	77,733.06	28.50	30,576.72	39.33
TOTAL	20,152.79	18,082.87	525,279.59	29.05	452,228.30	86.10	
	<i>*Production data source from May 2018 to April 2019 Estates has also deliver its FFB to SMLM Mill, TNGM Mill and 109 Mill</i>						
1.7.3	FFB description from other source						
	Name of sources/Organisation (RSPO certified / non-	Type of Organisation	number of smallholders	Production Area (Ha)	Supplied to Mill		
					FFB (tonnes/year)		

	certified)							
	-	-	-	-	-			
	TOTAL				-			
	*There is no FFB delivery from other sources							
1.7.4	Product categories		FFB, CPO, PK					
1.8	Estimate Tonnage of Certified Product							
1.8.1	Past Annual Claim Certified Product	Previous Certificate Claim (tonnes/year)		Actual Production for last year (MT)				
	• FFB Production	463,173		452,228				
	• CPO Production	101,898		95,937				
	• Palm Kernel (PK) Production	25,474		25,060				
1.8.2	Product selling							
	Tonnage of selling product	Period of actual selling product for last year (MT)						
	• CSPO sold as RSPO certified product	5,404						
	• CSPK sold as RSPO certified product	23,045						
	• CSPO sold under other scheme	90,252						
	• CSPK sold under other scheme	0						
	• CSPO sold as conventional	0						
	• CSPK sold as conventional	2,013						
1.8.3	Estimate of Certified FFB Claim							
	Name of Estates	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)			
	Sungai Rungau Estate	3,073.15	2,879.77	88,406	30.70			
	Sungai Seruyan Estate	4,870.84	4,180.03	107,340	25.68			
	Terawan Estate	4,481.87	4,327.91	109,200	25.23			
	Tangar Estate	4,445.15	3,967.73	133,995	33.77			
	Bukit Tiga Estate	3,281.78	2,727.43	55,900	20.50			
	TOTAL	20,152.79	18,082.87	494,841	27.37			
	*Projected FFB production for 26 August 2019 to 25 August 2020							
1.8.4	Estimate of Certified Palm Product Claim							
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel		Supply Chain Module
				Out put (ton)	Extraction (%)	Out put (tonnes)	Extraction (%)	
	Sungai Rungau	80	494,841	111,339	22.50	27,216	5,50	IP
	*Projected CSPO and CSPK production for 26 August 2019 to 25 August 2020							
1.9	Other Certifications							
	Proper			“Proper Biru” Certificate 2016				
	ISCC			ISCC (International Sustainability Carbon Certification)				

		Certificate Number: EU-ISCC-Cert-ID218-20180105 (valid from 20 October 2018 to 19 October 2019)				
	ISPO	MUTU-ISPO/063, issued by PT Mutuagung Lestari valid from 19 July 2016 to 18 Juli 2021				
1.10 Time Bound Plan						
1.10.1	Time Bound Plan for Other Management Units					
	Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status
	Mill	Time bound				
	Pangkalan Panji (PT Sawit Mas Sejahteras)	2013	Sawit Mas Estate	2013	South Sumatera	Certified
	Bumi Sawit Mill (PT Bumi Sawit Permai)	2013	Bumi Sawit Estate	2013	South Sumatera	Certified
	Muara Kandis Mill (PT Djuanda Sawit Lestari)	2013	Muara Tawas Estate	2013	South Sumatera	Certified
			Muara Kandis Estate	2013	South Sumatera	Certified
			Muara Kandis Estate (HGU on progress – 574.58 Ha)	2020	South Sumatera	-
			Muara Tawas Estate (HGU on progress – 73.78 Ha)	2020	South Sumatera	-
			Smallholder (KKPA Pandawa)	2020	South Sumatera	-
	Sungai Rungau Mill (PT Sumber Indah Perkasa)	2013	Sungai Rungau Estate	2013	Central Kalimantan	Certified
			Sungai Seruyan Estate	2013	Central Kalimantan	Certified
			Terawan Estate	2013	Central Kalimantan	Certified
			Tangar Estate	2013	Central Kalimantan	Certified
			Bukit Tiga Estate	2013	Central Kalimantan	Certified
	Bukit Perak EMIII (PT Bumi Permai Lestari)	2013	Bukit Perak Estate	2013	Bangka Belitung	Certified
			Bukit Permata Estate	2013	Bangka Belitung	Certified
	Tanjung Kembiri Mill (PT Forestalestari Dwikarya)	2013	Tanjung Kembiri Estate	2013	Belitung	Certified
			Tanjung Rusa Estate	2013	Belitung	Certified
			Tanjung Rusa Estate (HGU on process 48.81 Ha)	2020		
			Tanjung Rusa KKPA	2020	Belitung	-
	Sungai Buaya Mill (PT Sumber Indah Perkasa)	2014	Sungai Buaya Estate	2014	Lampung	Certified
			Smallholder (KKPA Gedung Aji Lama)	2014	Lampung	Certified

			Smallholder (KKPA Mesuji)	2014	Lampung	Certified
	Sungai Merah Mill (PT Sumber Indah Perkasa)	2014	Sungai Merah Estate	2014	Lampung	Certified
			Smallholder (KKPA Gedung Aji Baru)	2014	Lampung	Certified
	Kasuari Mill (PT Sinar Kencana Inti Perkasa)	2020	Cendrawasih Estate	2020	Papua	ST-1
			Nuri Estate	2020	Papua	ST-1
			Rajawali Estate	2020	Papua	ST-1
			Mambruk Estate (PT Sumber Indah Perkasa)	2020	Papua	ST-1
	Pekawai Mill (PT Agrolestari Mandiri)	2020	Kayung Estate	2020	West Kalimantan	ST-1
			Pekawai Estate	2020	West Kalimantan	ST-1
			Sungai Kelik Estate	2020	West Kalimantan	ST-1
			Nanga Tayap Estate	2020	West Kalimantan	ST-1
			Smallholder (Kayung Plasma)	2020	West Kalimantan	ST-1
	Kenanga Mill (PT Kencana Graha Permai)	2014	Kencana Estate	2015	West Kalimantan	Certified
			Cendana Estate	2015	West Kalimantan	Certified
			Kenanga Estate (PT Cahaya Nusa Gemilang)	2018	West Kalimantan	Certified
			Delima Estate (PT Kencana Graha Permai)	2020	West Kalimantan	-
			Gaharu Estate (PT Bangun Nusa Mandiri)	2020	West Kalimantan	-
			Smallholder (Gaharu Plasma)	2020	West Kalimantan	-
			Smallholder (Kencana Plasma)	2020	West Kalimantan	-
			Smallholder (Kenanga Plasma)	2020	West Kalimantan	-
	Perdana Mill (PT Binasawit Abadi Pratama)	2020	Perdana Estate	2020	Central Kalimantan	ST-1
			Lenggana Estate	2020	Central Kalimantan	ST-1
			Semandau Estate	2020	Central Kalimantan	ST-1
			Muara Dua Estate	2020	Central Kalimantan	ST-1
	Kuayan Mill (PT Agrokarya Prima Lestari)	2020	Mentaya Estate	2020	Central Kalimantan	ST-1
			Kuayan Estate	2020	Central Kalimantan	ST-1
			Bukit Santuhai Estate	2020	Central Kalimantan	ST-1

			Tajur Beras Estate	2020	Central Kalimantan	ST-1
			Seranau Estate	2020	Central Kalimantan	ST-1
			Sungai Sambon Estate	2020	Central Kalimantan	ST-1
			Smallholder (Sungai Sambon Plasma)	2020	Central Kalimantan	-
			Sapiri Estate (PT Buana Adhitama)	2020	Central Kalimantan	ST-1
			Bukit Dua Estate (PT Buana Adhitama)	2020	Central Kalimantan	
			Bukit Tunggal Estate (PT Buana Adhitama)	2020	Central Kalimantan	
	2020	Belian Mill (PT Paramitra Internusa Pratama)	Belian Estate	2020	West Kalimantan	ST-1
			Tengawang Estate	2020	West Kalimantan	ST-1
			Kenari Estate (PT Bangun Nusa Mandiri)	2020	West Kalimantan	ST-1
			KerANJI Estate (PT Bangun Nusa Mandiri)	2020	West Kalimantan	ST-1
			Muara Tawang Estate (PT Kartika Prima Cipta)	2020	West Kalimantan	ST-1
			Kapuas Hulu Estate (PT Persada Graha Mandiri)	2020	West Kalimantan	ST-1
			Sungai Beran Estate (PT Persada Graha Mandiri)	2020	West Kalimantan	ST-1
			Smallholder (Belian KKPA)	2020	West Kalimantan	-
			Smallholder (Kenari Plasma)	2020	West Kalimantan	-
			Smallholders (Kapuas Hulu KKPA)	2020	West Kalimantan	-
	2020	Sungai Kupang Mill (PT Sinar Kencana Inti Perkasa)	Sungai Kupang Estate	2020	South Kalimantan	ST-2 May 2015
			Sungai Kupang KKPA	2020	South Kalimantan	
			Senakin Estate	2020	South Kalimantan	-
	2020	Sungai Kikim Mill (PT Sawit Mas Sejahtera)	Sungai Kikim Estate	2020	South Sumatera	-
			Sungai Pangi Estate	2020	South Sumatera	-
			Sungai Musi Estate	2020	South Sumatera	-
			Sungai Saling Estate	2020	South Sumatera	-
			Sungai Enim Estate (PT Bumi Sawit Permai)	2020	South Sumatera	-

		Sungai Lematang Estate (PT Bumi Sawit Permai)	2020	South Sumatera	-
Tangar Mill (PT Mitra Karya Agroindo)	2020	Sulin Estate	2020	Central Kalimantan	-
		Nahiyang Estate	2020	Central Kalimantan	-
		Katayang Estate	2020	Central Kalimantan	-
		Sungai Nusa Estate	2020	Central Kalimantan	-
		Kajui Estate (PT Agro Lestari Sentosa)	2020	Central Kalimantan	-
		Manuhing Estate (PT Agro Lestari Sentosa)	2020	Central Kalimantan	-
		Sungai Ayawan Estate (PT Aditunggal Mahajaya)	2020	Central Kalimantan	-
Sungai Magalau Mill (PT Sinar Kencana Inti Perkasa)	2020	Sungai Magalau Estate	2020	South Kalimantan	-
Jalemo Mill* PT Agro Lestari Sentosa	2020	Balasang Estate	2020	Central Kalimantan	-
		Jalemo Estate	2020	Central Kalimantan	-
Sako Mill* (PT Adi Tunggal Mahajaya)	2020	Sulin Plasma	2020	Central Kalimantan	-
		Sapiri Plasma	2020	Central Kalimantan	-
		Sako Plasma	2020	Central Kalimantan	-
Padang Halaban Mill (PT SMART Tbk)	2011	Padang Halaban Estate	2011	North Sumatera	Certified
		Penantian Estate	2011	North Sumatera	Certified
		Adipati Estate	2011	North Sumatera	Certified
		Kanopan Ulu Estate	2011	North Sumatera	Certified
Batu Ampar Mill (PT SMART Tbk)	2012	Batu Ampar Estate	2012	South Kalimantan	Certified
		Batu Mulia Estate	2012	South Kalimantan	Certified
		Sungai Panci Estate	2012	South Kalimantan	Certified
		Sungai Panci KKPA	2012	South Kalimantan	Certified
Tanah Laut Mill (PT SMART Tbk)	2012	Tanah Laut Estate	2012	South Kalimantan	Certified
		Kinta Pura Estate	2012	South Kalimantan	Certified
Langga Payung Mill (PT Tapan Nadenggan)	2012	Langga Payung Estate	2012	North Sumatera	Certified
		Paya Baung Estate	2012	North Sumatera	Certified
		Normark Estate	2012	North Sumatera	Certified
Hanau Mill	2012	Hanau Estate	2012	Central	Certified

	(PT Tapian Nadenggan				Kalimantan	
			Tasik Mas Estate	2012	Central Kalimantan	Certified
			Tanjung Paring Estate	2012	Central Kalimantan	Certified
			Langadang Estate	2012	Central Kalimantan	Certified
			Medang Sari (PT Satya Kisma Usaha)	2020	Central Kalimantan	-
	Semilar (PT Tapian Nadenggan	2013	Semilar	2013	Central Kalimantan	Certified
			Sei Rindu	2013	Central Kalimantan	Certified
			Mandang	2013	Central Kalimantan	Certified
			Puri	2013	Central Kalimantan	Certified
	Jak Luay Mill	2015	Pantun Mas Estate	2015	East Kalimantan	Certified
			Jak Luay Estate	2015	East Kalimantan	Certified
			Jak Luay KKPA	2020	East Kalimantan	-
			Long Buluh Estate	2015	East Kalimantan	Certified
			Bukit Subur Estate	2015	East Kalimantan	Certified
			Bukit Subur KKPA	2020	East Kalimantan	-
	Leidong West Mill (PT MP Leidong West Indonesia)	2014	Leidong West Utara Estate	2014	Bangka Belitung	Certified
			Leidong West Selatan Estate	2014	Bangka Belitung	Certified
	Muara Wahau Mill (PT Kresna Duta Agroindo)	2014	Muara Wahau Estate	2014	East Kalimantan	Certified
			Gunung Kombeng	2014	East Kalimantan	Certified
	Gunung Kombeng Mill (PT Kresna Duta Agroindo)	2020	Gunung Kombeng KKPA	2020	East Kalimantan	-
	Rantau Panjang (PT Kresna Duta Agroindo)	2020	Rantau Panjang Estate	2020	East Kalimantan	-
			Rantau Panjang KKPA	2020	East Kalimantan	-
	Jelatang Mill (PT Kresna Duta Agroindo)	2014	Bangko Estate	2014	Jambi	Certified
			Tiga Serumpun KKPA	2020	Jambi	-
	Pelakar Mill (PT Kresna Duta Agroindo)	2020	Pelakar Estate	2020	Jambi	ST-2 Sept 2017
			Tiga Serumpun KKPA	2020	Jambi	ST-2 Sept 2017
			Batang Merangin Estate	2020	Jambi	ST-2 Sept 2017
	Langling Mill (PT Kresna Duta	2014	Bangko Estate	2014	Jambi	Certified
			Bangko Plasma	2019	Jambi	-

	Agroindo)		Batang Gading Estate	2020	Jambi	-
			Batang Gading KKPA (PT Satya Kisma Usaha)	2020	Jambi	-
	Sungai Bengkal Mill (PT Satya Kisma Usaha)	2015	Sungai Bengkal Estate	2015	Jambi	Certified
			Sungai Bengkal KKPA	2015	Jambi	Certified
			Muara Kilis Estate	2015	Jambi	Certified
			Muara Kilis KKPA	2020	Jambi	-
	Bukit Kapur Mill (PT SMART Tbk)	2020	Bukit Kapur Estate	2020	South Kalimantan	ST-1
			Sungai Cantung Estate	2020	South Kalimantan	ST-1
	Samsam Mill (PT Ivomas Tunggal)	2009	Samsam Estate	2009	Siak-Riau	Certified
			Samsam Estate (HGU on progress – 29.09 Ha)	2020	Siak-Riau	-
			Kandista Estate	2009	Siak-Riau	Certified
			Kandista Estate (HGU on progress – 158.46 Ha)	2020	Siak-Riau	-
			Palapa Estate	2009	Siak-Riau	Certified
	Libo Mill (PT Ivomas Tunggal)	2009	Libo Estate	2009	Siak-Riau	Certified
			Nenggala Estate	2009	Siak-Riau	Certified
			Nenggala Estate (HGU on progress 419.9 Ha)	2020	Siak-Riau	-
			Sei Rokan Estate	2009	Siak-Riau	Certified
			Sei Rokan Estate (HGU on progress – 102.7 Ha)	2020	Siak-Riau	-
	Ujung Tanjung (PT Ivomas Tunggal)	2009	Ujung Tanjung Estate	2009	Siak-Riau	Certified
			Ujung Tanjung Estate (HGU on progress – 557.3 Ha)	2020	Siak-Riau	-
	Naga Sakti Mill (PT Buana Wiralestari Mas)	2010	Naga Mas Estate	2010	Kampar-Riau	Certified
			Naga Mas Estate (HGU on process – 253.39 Ha)	2020	Kampar-Riau	-
			Naga Sakti Estate	2010	Kampar-Riau	Certified
			Naga Sakti Estate (HGU on process – 59.79 Ha)	2020	Kampar-Riau	-
			Rama Bakti Estate	2010	Kampar-Riau	Certified
	Kijang Mill (PT Buana Wiralestari)	2010	Kijang Mas Estate	2010	Kampar-Riau	Certified
			Kijang Mas Estate	2020	Kampar-Riau	-

	Mas)		(HGU on process – 56.07 Ha)			
			Kijang Kencana Plasma	2010	Kampar-Riau	Certified
	Ramarama Mill (PT Ramajaya Pramukti)	2010	Ramarama Estate	2010	Kampar-Riau	Certified
			Ramarama Estate (HGU on process – 318.76 Ha)	2020	Kampar-Riau	-
			Amartajaya Plasma	2010	Kampar-Riau	Certified
	Indra Sakti Mill (PT Meganusa Inti Sawit)	2011	Indra Lestari Estate	2011	Indragiri-Riau	Certified
			Indra Sakti Estate	2011	Indragiri-Riau	Certified
			Indragiri Plasma	2011	Indragiri-Riau	Certified
			Indrasakti Plasma	2011	Indragiri-Riau	Certified
	Bumipalma Mill (PT Bumipalma Lestari Persada)	2012	Bumi Lestari Estate	2012	Indragiri-Riau	Certified
			Bumi Palma Estate	2012	Indragiri-Riau	Certified
			Bumi Sentosa Estate	2012	Indragiri-Riau	Certified
			Bumi Palma Estate (HGU on process – 39.21 Ha)	2020	Indragiri-Riau	-
	Sawita Mill (PT Sawitakarya Manunggal)	2020	Sawita Estate	2020	South Kalimantan	ST-1
			Pamukan Estate	2020	South Kalimantan	ST-1
			Sawita KKPA	2020	South Kalimantan	ST-1
	There are revision of time bound plan, the justification from top management is:					
1. Pelakar Mill is still process on disclosure & liability by RSPO, while Bukit Kapur Mill doesn't have land use title (HGU), the HGU is still on process.						
2. Land use titles for Rantau Panjang Mill and its supply base are still on process						
3. Several associate smallholders (plasma) which refuses to follow the RSPO certification, but the management unit is still communicating with the plasma for the implementation of RSPO certification.						
4. Sawita Mill had conducted pre assessment RSPO on 2015 and Another entire Management Unit under PT Ivo Mas Tunggal has been RSPO certified.						
5. Sawita mill and sawita estate are still in process of HCV RaCP related to land clearing after November 2005 without preceeded HCV identifications.						
6. Rantau Panjang Mill and Estate Unit (Rantau Panjang Estate & Rantau Panjang KKPA) are still in the process of HCV Remediation and Compensation Plan (RaCP) related to land clearing above November 2005 without HCV Identifications. In accordance to RSPO requirements, if RaCP proposal not yet approved by RSPO Secretariat. Thus certification target will be postponed by year of 2020.						
7. Kilis KKPA as FFB Supplier to Sungai Bengkal Mill are still in the process of HCV Remediation and Compensation Plan (RaCP) related to land clearing above November 2005 without HCV Identifications. In accordance to RSPO requirements, if RaCP proposal not yet approved by RSPO Secretariat. Thus certification target will be postponed by year of 2019						
8. PT Kresna Duta Agro (Pelakar Estate, Batang Merangin Estate and Batang Tembesi Estate) was stage -1 audit in 2017. There are problem related to zero liability report to RSPO, was no response by RSPO secretariat. The main assessment postpone to 2019.						
9. When the stage -1 conducted on May 2015, there are boundary stones issues in PT Sinar Kencana Inti Perkasa (South Kalimantan). Reconstruction of boundary stones will be finished end of this year, the certification target postpone to 2019.						
Time bound plan revision						
• There is revision of time bound plan on 12 March 2018 made by head of sustainability department for HGU on						

	<p>process in PT Ivomas Tunggal (Samsam Estate 29.09 Ha, Kandista Estate 158.46 Ha, Nenggala Estate 419.9 Ha, Sei Rokan Estate 102.7 Ha, Ujung Tanjung Estate 557.3 Ha); PT Rama Jaya Pramukti (Ramarama Estate: 318.76 Ha); PT Buana Wira Lestari (Naga Sakti Estate 59.79 Ha; Naga Mas Estate 253.39 ha and Kijang Estate 56.07 ha); PT. Forestalestari Dwikarya (Tanjung Rusa Estate 48.81 Ha); PT. Djuanda Sawit Lestari (Muara Kandis Estate 402.41 Ha & Muara Tawas Estate (73.78 Ha). For this area is planned for audit on 2020 because waiting for HGU</p> <ul style="list-style-type: none"> • Revision on March 22, 2019 regarding HGU on process on PT Sumber Indah Perkasa, Sungai Buaya Mill & Sungai Merah Mill, Lampung province. Covered an areas for Sungai Merah estate (241.54 ha) and Sungai Buaya estate (73.71 ha & 26.18 ha). GAR has planned this HGU on process area to be certified on 2020.
1.10.2	Progress of Associated Smallholders and Outgrowers for Certifiable Standard
	Sungai Rungau Mill – PT Binasawit Abadi Pratama has no smallholders scheme also not received FFB from smallholders or outgrowers. All FFB process supplied from PT Binasawit Abadi Pratama.

2.0 ASSESSMENT PROCESS	
2.1 Assessment Team	
ASA-1.1	<p>1. Andi Pratama Pasaribu (Lead Auditor). Indonesian citizen. Bachelor degree, majoring social economy. He has several of work experiences (more than 5 years) as the operational staff since 2008. He has been followed the Training of Lead Auditor Indonesian Sustainable Palm Oil (ISPO) which was held by ISPO Commission in 2013 and Training of Lead Auditor Roundtable on Sustainable Palm Oil (RSPO) by Proforest and Daemeter in 2016. He has been attended several kinds of training related to sustainability palm oil audit such as High Conservation Value (HCV) Training, Lead Auditor ISO 9001:2008, Lead Auditor ISO 14001:2005, auditor OHSAS, lead auditor RSPO supply chain by BMTRADA etc. He has some experiences of RSPO audit in Indonesian palm oil in aspect of best management practices, land legality, environmental, social and worker welfare aspect. During this assesment has verified legal, social and supply chain aspect.</p> <p>2. Mohamad Amarullah (Auditor). Indonesian Citizen. Master of Wood Science and Technology and Bachelor of Forestry, majoring in Forest Product Technology. Has experiences as an Agronomist and Research Assistant in Indonesia and Malaysia from 2008 to 2014. Has been attended several trainings such as Lead Auditor of ISPO, RSPO, ISO 17021, ISO 17065, ISO 9001, ISO 19001, ISO 14001, HCV, etc. Has been conducted several ISPO audit scheme as an Auditor since 2014 in BMP, environment, conservation and OHS aspect. Fluent in Bahasa, Malay and English. During this assesment has verified BMP, long term management plan, information transparency and communication aspect.</p> <p>3. Steve Mualim (Auditor). Indonesia citizen. Master of Environmental and Natural Resources Management. Has experience as an environmental management consultant in 2012 and Sustainable palm oil assurance auditor since 2013. Has been attended several trainings i.e. : ISCC in house training, palm oil GHG emission, HCV management, ISPO lead auditor, RSPO lead auditor, labor and human rights issues, ISO 19011, and ISO 9001:2008. Has been conducted several audits for RSPO, ISPO and MSPO scheme since 2013 for best management practices, conservation, and environmental management. Fluent in Bahasa and Chinese Mandarin. At the time of audit has appointed to verify social, transparency, HCV and environmental aspect. During this assesment has verified environment, conservation and GHG aspect.</p> <p>4. Rindu Galih Rezza Rachmansyah (Auditor Trainee). Indonesian citizen, Bachelor of Agriculture department of plant and pest disease (Agrotechnology). He has 1 year experience as Field Expert in Pesticide Company and 3 years experience in Industrial Forest Management, Forest Rehabilitation and Reclamation on BUMN Indonesia as Assistant. Training which had attended including Training Lead Auditor ISO 9001, ISO 14001, ISO 17021, ISO 19011, Training ISPO, RSPO awareness, RaCP and NPP awareness for RSPO, OHSAS 18001 : 2007. He has been involved in several audit activities related to sustainable palm oil certification since 2017 covering Best Management Practices aspect, social aspect and worker welfare aspect. During this assesment has support to verified manpower and safety aspect.</p>
2.2 Assessment Methodology, Assessment Process and Locations of Assessment	
2.2.1	Figure of person days to implement assessment
ASA-1.1	<p>Number of auditors: 3 auditor and 1 auditor trainee</p> <p>Number of days for RC at site: 5 days</p> <p>Number of working days for RC at site: 15 working days</p>
2.2.2	Assessment Process
ASA-1.1	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Binasawit Abadipratama to the requirements of Indonesian National Interpretation of RSPO Principles and Criteria 2013, endorsed September 2016 and Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014 Revised June 2017 (Module D for CPO Mill).</p> <p>The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) interview, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site.</p>

	<p>Some opportunities for improvement of the results Recertification delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase (ASA-1.1).</p> <p>Improvement of findings from Recertification assesment findings were observed by auditors at this Surveillance-1.1 assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of Surveillance-1.1.</p> <p>The assessment program please find Appendix 2.</p>
2.2.3	Location of Assessment
ASA-1.1	<p>Number of units in this certification activity is 5 estates, which supply the raw material (FFB) to Sungai Rungau Palm Oil Mill. In conducting the assessment, the team of auditors determined that the sampling locations are Sungai Rungau Palm Oil Mill and 2 Estates, e.g. Sungai Seruyan Estate and batu Tiga Estate.</p> <p>Sungai Seruyan Estate (SSRE) – 21 May 2019</p> <ul style="list-style-type: none"> • Boundary Pole BPN 126 Block O21 and BPN 127 Block O20 Division 6. Observation of demarcation area. • Division 3 Block S31. Observation to Herbicide Application (Roll Up and Erkaforon) on the palm circle and harvesting path, as interview with Foreman and 8 female Pesticide Applicators, on their understanding towards technical, daily work base (5 ha/applicator), OSH, manpower, environment, conservation, as well as facilities provided by the company. Furthermore, there was also observation on Gupon or Barn Owl (<i>Tyto alba</i>) Box, which expected that every <i>Gupon</i> is able to control rat population for radius 25-30 ha. • Division 5 Block R31. Observation on HCV riparian zone of Seruyan River (upstream) Management, occupation of Gupon and plastic mulching which aim for <i>Turnera subulata</i> planting site preparation, located in adjacent with main road and collection road. • Division 4 Block P38. Observation to Empty Fruit Bunches (EFB) Application (mulching) on the edge of palm circle, and interview with Foreman and 3 male workers, on their understanding towards technical, OSH, manpower, environment, conservation, as well as facilities provided by the company. Dosage implemented was 40 ton EFB/ha/year or \pm 300 kg EFB/palm/year. • Division 4 Block Q34. Observation on HCV riparian zone of Sempadan Sungai Rungau which covers about 600 ha, which shown by red-cross marks on the palm trunk, HCV sighboard and signboard of animal hunting prohibition. • Division 6 Block P21/22. Observation to Harvesting activities and interview with Foreman and 2 Harvesters, on their understanding towards technical, premium calculation, daily work base, OSH, manpower, environment, conservation, as well as facilities provided by the company. It was informed that every Harvester is assisted by 1 loosefruit picker, which mostly female with permanent status. • Seruyan riparian block R31 div 5. Observation for HCV management • Rungau riparian block Q34 div 4. Observation for HCV management • BPN pole BAP 126 block O21 div 6. Observation legal operational areal demarcation • BPN pole BAP 127 block O127 div 6. Observation for legal operational areal demarcation • PPE store for spraying team div 5/6. Observation for OHS agrochemical waste management • Mixing area. Observation for agrochemical management • Housing div 5/6. Observation for OHS, workers welfare and waste management • Daycare div 5/6. Observation for OHS and worker facilities • Sparepart store. Observation for OHS and material handling • Lubricants store. Observation for OHS and material handling • Agrochemical store. Observation for OHS and material handling • Fertilizer store. Observation for OHS and material handling • Diesel fuel tank. Observation for OHS and material handling • Workshop. Observation for OHS and waste management • Power house. Observation for OHS and waste management • Temporay hazardous waste store. Observation for OHS dan hazardous waste handling

- **Emergency response team simulation.** Observation for emergency response team
- **Clinic.** Observation for OHS and worker welfare

Sungai Rungau Mill (SRUM) – 22 May 2019

- **Security Gate.** Observation and interview with security officer regarding of receive and dispatch procedure.
- **Weighbridge.** Observation and interview with weighbridge operator regarding of receive and dispatch procedure, recapitulation, labour issue etc.
- **Loading Ramp Station.** Observation and interview with 2 Operators, on their understanding towards technical, OSH, manpower, environment, as well as facilities provided by the company.
- **Sterilizer Station.** Observation and interview with 1 Operator, on his understanding towards technical, OSH, License, manpower, environment, as well as facilities provided by the company.
- **Thresher Station.** Observation and interview with 1 Operator, on his understanding towards technical, OSH, manpower, environment, as well as facilities provided by the company.
- **Press Station.** Observation and interview with 1 Operator, on his understanding towards technical, OSH, manpower, environment, as well as facilities provided by the company.
- **Clarification Station.** Observation and interview with 1 Operator, on his understanding towards technical, OSH, manpower, environment, as well as facilities provided by the company.
- **Nut and Kernel Station.** Observation and interview with 1 Operator, on his understanding towards technical, OSH, manpower, environment, as well as facilities provided by the company.
- **Engine Room Station.** Observation and interview with 1 Operator, on his understanding towards technical, Generator Capacity (850 kVA dan 460 kVA), License for Electrical Expert, OSH, manpower, environment, as well as facilities provided by the company.
- **Boiler Station.** Observation and interview with 1 Operator, on his understanding towards technical, Boiler Capacity (30 ton/hour), License, OSH, manpower, environment, as well as facilities provided by the company.
- **Water treatment plant.** Observation for OHS and water usage monitoring
- **Hazardous waste store.** Observation for OHS and hazardous waste handling
- **Lubricants store.** Observation for OHS and material handling
- **Chemical store.** Observation for OHS and material handling
- **Empty bunch area.** Observation for OHS and organic waste management
- **Waste Water treatment plant.** Observation for POME management
- **Biogas plant.** Observation for POME utilization
- **Reservoir.** Observation for water sources management
- **Workers housing.** Observation for OHS, and workers facilities

Bukit Tiga Estate (BTGE) – 23 May 2019

- **Boundary Pole BPN 14 and BPN 15 Block N82 Division 4.** Observation of demarcation area.
- **Divisi 4 Block N75.** Observation to **Herbicide Application** (Roll Up and Erkaforon) on the palm circle and harvesting path, as interview with Foreman and 4 Pesticide Applicators (1 Female and 3 Males), on their understanding towards technical, daily work base (5 ha/applicator), OSH, manpower, environment, conservation, as well as facilities provided by the company. Furthermore, there was also observation on **Gupon** and **Terraces Area**. Land cover crop condition were considered satisfactory.
- **Divisi 4 Block M75/76.** Observation to **Plastic Mulching** for *Turnera subulata* planting site preparation.
- **Divisi 4 Block N76.** Observation to planting of beneficial plant *Cassia tora*.
- **Divisi 2 Block P68.** Observation to **Barn Owl (*Tyto alba*) Sanctuary**. Founded 3 juveniles.
- **Divisi 4 Block M77.** Observation to **Leaf Eating Caterpillar Census** and interview with 1 Census Worker, on his understanding towards technical (early warning and sampling techniques), pest incidence threshold limit, OSH, manpower, environment, as well as facilities provided by the company.
- **Fertilizer store.** Observation for OHS and material handling
- **Agrochemical store.** Observation for OHS and material handling
- **Diesel fuel tank.** Observation for OHS and material handling

	<ul style="list-style-type: none"> • Workshop. Observation for OHS and waste management • Power house. Observation for OHS and waste management • Temporay hazardous waste store. Observation for OHS dan hazardous waste handling • Emergency response team simulation. Observation for emergency response team • Mixing area. Observation for agrochemical management • BTGE 1 riparian block M81 div 4. Observation for HCV management <p>Eksternal Stakeholder:</p> <ul style="list-style-type: none"> • Environment Agency of Seruyan Regency • Manpower and Transportation Agency of Seruyan Regency • Food Security & Counseling of Seruyan Regency • National land Agency of Seruyan Regency • CV. Bina Perkasa (Local Contractor for CPO Transport) • Local Contractor for FFB Transport Sdr. Umiyanto at Sungai Seruyan Estate • Local Contractor for FFB Transport Sdr. Ponijo at Bukit Tiga Estate <p>Internal Stakeholder:</p> <ul style="list-style-type: none"> • Gender Committee Sungai Rungau Mill • Gender Committee Sungai Seruyan Estate • Gender Committee Bukit Tiga Estate • Labor Union Serikat Pekerja Mandiri (SPM) Sungai Rungau Mill • Labor Union Serikat Pekerja Mandiri (SPM) Sungai Seruyan Estate • Labor Union Serikat Pekerja Mandiri (SPM) Bukit Tiga Estate • Worker Cooperative Bangkit Bersama (Sungai Rungau Mill) • Worker Cooperative Bina Seruyan (Sungai Seruyan Estate) • Worker Cooperative Bukit Mandiri (Bukit Tiga Estate)
2.3 Stakeholder Consultation and Stakeholders Contacted	
2.3.1	Summary of stakeholder consultation process.
ASA-1.1	<p>Consultation of stakeholders for PT Binasawit Abadipratama held by:</p> <ol style="list-style-type: none"> 1. Public announcement at Mutu Certification Website (www.mutucertification.com) on 03 May 2019. 2. Public consultation with government agencies of Seruyan district via telephone (Food Security & Counseling Agency; Environmental agency, Manpower and Transmigration Agency; National Land Agency) on 21 May 2019. 3. Public consultation by interview with locals of the nearby village (Rungau Raya & Pantap Village) on 21 May 2019. 4. Consultation meeting and interview with Internal Stakeholder (labour union, gender committee and local contractor) on 21 May 2019. 5. Consultation with NGO (Walhi, WWF Indonesia, AMAN and Sawit Watch) via email on 15 May 2019. <p>Numbers of input from stakeholders were clarified by PT Binasawit Abadipratama.</p>
2.3.2	Stakeholder contacted
	<i>Please find appendix 1</i>
2.4 Determining Next Assessment	
	The next visit ASA-1.2 shall be undertaken within twelve months of the license expiration dates, but not earlier than eight months after the expiration date.

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Sungai Rungau Mill, PT Binasawit Abadipratama subsidiary of Golden Agri Resources Ltd. operation consisting of one (1) mill and five (5) oil palm estates.

During the assessment, there were 1 (one) nonconformities were assigned against Major Compliance Indicator, 1 (one) nonconformities were assigned against Minor Compliance Indicator and there were 2 (two) 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.

MUTUAGUNG LESTARI found that Sungai Rungau Mill, PT Binasawit Abadipratama subsidiary of Golden Agri Resources Ltd complied with the requirements of Indonesian National Interpretation of RSPO Principles and Criteria 2013 by INA-NITF, July 2016 (Endorsed by the RSPO Board of Governors meeting on 30th September 2016) and RSPO Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014 revised June 2017 (Module D for CPO Mill).

Therefore MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is issued.

Ref Std.	VERIFICATION RESULT of MUTU-Certification
PRINCIPLE #1 COMMITMENT TO TRANSPARENCY	
1.1	Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.
1.1.1	<p>The CH has list of stakeholders which updated annually by SPO Region Kalimantan tengah 2 and approved by Regional Controller. As latest update on 25 January 2019, list of stakeholders is consist of 2 Head of Sub-Regency from Seruyan Raya and Danau Seluluk; 5 Head of Village from Asam baru, Rungau Raya, Sebabi, Selunuk and Pantap Village; 6 Head Master of education institutions (schools); 3 Elders from Village of Rungau Raya, Asam Baru and Sebabi; 5 Head of Labour Union from all Estates; 5 Head of Gender Committee from all Estates; 22 Local Contractors; 5 PIC from surrounding companies; 7 PIC from government institutions (BPJS Manpower, BPJS Health, Environment Agency, Manpower Agency, Plantation Agency, Manpower Agency of Seruyan Regency and Kalimantan Tengah Province, and Police Sector Office; 2 representative of Hospital (Murjani and Hanau); and 2 NGO's (Orang Utan Foundation International and Lingkaran Komunitas Sawit). The list has informed name of institution, address, contact number and PIC. Type of information that could be accessed are list of stakeholders, NPWP (company tax number), tax or retribution payment evidence, environment documents, Company Acta and its Revision/Adendum, hectare statement, operational activities (ex. Manuring record), legal towards land ownership (HGU), HCV report, SIA report, social related report, work accident report, OSH Committee report, sustainable improvement report, RSPO audit report, Human Right Policies, etc. request of information which not listed above shall be after permitted by top management. All report related to government institutions has also could be accessed by public.</p> <p>Procedure of information request is presented in procedure No. SOP/SMART/UMUM/SADV/I/004 (Rev 00) dated 01 July 2014 about mechanism of communication and consultation for external and internal stakeholders. Socialization of procedure had been conducted to all Village on 12 April 2016 by SPO Officer. This is confirmed during interview with representatives from Village of Rungau Jaya and Pantap.</p>
1.1.2	

Procedure of communication and consultation for external and internal stakeholders mechanism is presented in document No. SOP/SMART/UMUM/SADV/I/004 (Rev 00) dated 01 July 2014. For internal stakeholders information request is starts by filling information Form and should be approved by SPO Officer. Meanwhile for external stakeholders, information could be through directly filling the Form of Communication, email and letter. Information which has no listed on public document, is approved when permitted by top management. SPO Officer was person in charge (PIC) to deliver information request to the respective Department, for approval from the respective PIC. Time of information response shall be less than 1 week and plan for response arrangement should be less than 3 weeks. Receipt of information delivery is made as evidence of response. PIC for information request, especially on social matters is conducted by the respective Estate Manager as presented through Decree of Regional Controller (RC) and Production Controller (PC) Kalimantan Tengah 2 Region No. 03/RC-KALTENG-2/01/2017 dated 04 January 2017. Information request and response is recorded on logbook Form No. F/SMART/UMUM/SADV/004/002 which informed date of Letter In (information request letter) and date Letter Out (company response letter). According to logbook review, it was known that there is no information request in 2018 and 2019 for SSRE and BTGE. However, there are recorded several compulsory report which delivered based on periodic schedule to the respective government institutions.

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

Procedure No. SOP/SMART/UMUM/SADV/I/004 (Rev 00) dated 01 July 2014 in Part 2.8 has mentioned that type of information that could be accessed are list of stakeholders, NPWP (company tax number), tax or retribution payment evidence, environment documents, Company Acta and its Revision/Adendum, hectare statement, operational activities (ex. Manuring record), legal towards land ownership (HGU), HCV report, SIA report, social related report, work accident report, OSH Committee report, sustainable improvement report, RSPO audit report, Human Right Policies, etc. request of information which not listed above shall be after permitted by top management. All report related to government institutions has also could be accessed by public. CH management is able to shows evidence of information delivery to several government institutions, for example as recapitulate in the following Table:

Institution	Type of Report	Date of Delivery		
		SRUM	SSRE	BTGE
Manpower Agency	WLTK Annual 2018	04 Apr 2019	18 Apr 2019	18 Apr 2019
	P2K3 Quarter 1	09 Apr 2019	01 April 2019	01 Apr 2019
Plantation Agency	Land Fire Quarter 1	01 Apr 2019	01 Apr 2019	01 Apr 2019
	LPUP Annual	30 Apr 2019	30 Apr 2019	30 Apr 2019
Environment Agency	RKL/RPL Semester 2	10 Apr 2019	10 Apr 2019	10 Apr 2019
	Hazardous Material Q-1	07 May 2019	07 May 2019	07 May 2019
Land Agency	HGU realization Annual	11 Apr 2019	11 Apr 2019	11 Apr 2019

According to the Table above, it could be concluded that the CH has monitor compulsory periodic report and deliver it on time.

Status: Comply

1.3

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

1.3.1

The company has a Business Ethics Policy that was approved by VPA (Vice President of Agronomy) PSM 6 on August 1, 2014 which states that the company has a commitment to behave ethically in all business transactions and operations that are guided by the company's shared values, namely, integrity, positive attitude, commitment, continuous improvement, innovation and loyalty and in accordance with the principles of sustainable management of oil palm plantations.

Based on the results of interviews with local contractors, it is known that so far the company has always delivered information related to business ethics policies to local contractors at the time of signing the work contract so that the contractor understands the provisions well. In addition, based on the results of interviews with harvest workers, fertilizer,

spray and plant operators it is known that workers understand and carry out business ethics determined by the company including understanding related to bribery bans, embezzlement of company assets and other things. Workers are regularly given outreach annually with regard to this matter and there are also warnings in some locations as a reminder of business ethics if workers forget.

Status: Comply

PRINCIPLE #2 COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS

2.1

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

2.1.1

Compliance with labor regulations

- The company has implemented a minimum wage in the wage system and is in accordance with Ministry of Manpower Regulation No. 07 of 2013 concerning Minimum Wages
- The company has a wage structure and scale for each level of workers and is in accordance with Ministry of Manpower Regulation No. 01 of 2017 concerning Wage Structure and Scale
- The company has reported regularly the Labor Obligation Report annually and is in accordance with Ministry of Manpower Regulation No. 18 of 2017 concerning Mandatory Reporting of Workers

Compliance with regulations in the OHS

The company has workers with licenses / certificates for jobs that require special expertise in accordance with the requirements in the legislation, including:

Transport & Lift Operators

- Wheel Loader Operator in the name of Tarmidi with certificate No. 18240 / OPK3 / PAA-LT // XII / 2016 dated 30 December 2016 and valid until 30 December 2021
- Dump Truck Operator in the name of Riduwan with certificate No. 12.3464-OPK3-LT / PAA / VI / 2017 dated June 9, 2017 and valid until June 09, 2022

Steam Operator

- Class 1 Boilerman in the name of Riowanto with certificate No. 13.5597-OPK3-PUBT-B 1 / XII / 2018 dated December 7, 2018 and valid until December 07, 2023
- Class 1 Boilerman in the name of Eko Supriyanto with certificate No. 13.5596-OPK3-PUBT-B 1 / XII / 2018 dated December 7, 2018 and valid until December 07, 2023

Electrical Operator

- OHS Electric Expert in the name of Dhika Prasetya with certificate No. KEP.00225 / NAKER-BINWASK3 / AK3-LIST / V / 2016 dated May 4, 2016 and is valid until May 04, 2019.
- OHS Electric Technician in the name of Martua Sitompul with certificate No. 92778 / TK3-List / DPNK3 / 09.14 dated 15 September 2014 and valid until 15 September 2019.

Production & Power Operator

- Operator of Production Machine in the name of Mursanto with certificate No. 421 / OPM-K3 / PTP / IV / 2019 dated April 8, 2019 and valid until April 8, 2024
- Operator of Production Machine in the name of Syaifulah with certificate No. 422 / OPM-K3 / PTP / IV / 2019 dated April 8, 2019 and valid until April 8, 2024

Welder

- Welder in the name of Rustem Nawawi with certificate No. 28900.7212.05.0224.10.2017 dated May 09, 2017 and valid until May 09, 2020
- Welder in the name of Nanag with certificate No. 28900.7212.05.0224.05.2017 dated May 09, 2017 and valid until May 09, 2020

2.1.2; 2.1.3 & 2.1.4

The company has the following regional, national and international regulations:

Regulation for the Estate Unit (passed on 15 February 2019)

- Law Register for 50 labor Regulations

- Law Register for 13 Social Regulations
- Law Register for 57 OHS Regulations
- Law Register for 54 Plantation Regulations
- Law Register for 27 Environmental Regulations

Regulations for Mill Units (passed February 15, 2019)

- Law Register for 50 labor Regulations
- Law Register for 13 Social Regulations
- Law Register for 57 OHS Regulations
- Law Register for 54 Plantation Regulations
- Law Register for 56 Environmental Regulations

The company has a regulatory evaluation mechanism listed in the SOP Other Regulations & Requirements with document No. SOP / SPO / SMART / LH-03. Evaluation of compliance with regulations is conducted regularly by the Central Kalimantan SPO Region, assisted by Assistant / Document Controller. The last evaluation was carried out on 31 December 2018 for the basis for establishing the list of regulations in 2019.

Based on the evaluation results and the updated regulations, there are a number of additions to the list of regulations including:

- Minister of Manpower and Transmigration Regulation No. 18 of 2017 concerning Mandatory Procedures for Reporting Employment in Companies in the Network. This regulation has been fulfilled by companies by conducting mandatory reporting online for reporting in 2019.
- Minister of Manpower and Transmigration Regulation No. 37 of 2016 concerning Pressure Vessels and Storage Tanks. This regulation has been fulfilled by providing training to workers to obtain a OHS Pressure Vessel and Storage Tank.
- Minister of Environment & Forestry Regulation No. 05 of 2018 concerning Standards & Certification of Competencies in Charge of Operational Waste Water Management and Responsible for Water Pollution Control. This regulation has been complied with by involving workers in the name of Tegar Andalas for the competency training of the Water Pollution Control Manager (MPPA).

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

Consistent with the results of previous audits, CH can demonstrate land tenure documents and chronology are:

- Location Permit from the Government of East Kotawaringin dated July 20, 1994 covering 25,000 ha
- Forest area conversion letter dated January 29, 1996 covering an area of 17,780.
- Plantation Business Permit dated February 23, 2000 for plantation with an area of 20.180 hectares and mills with with capacity of 60 Tons FFB / Hour
- Land title (HGU) of PT. BAP (certificates number 17 dated 18 March 2008 covering an area of 20,152.79 hectares).

In year 2014, PT. SIP sold the mill including its WWTP and reservoirs to PT. BAP with a total area of 19.75 hectares, as shown by the agreement numbers 02, 03 and 04 dated January 20, 2015. Changes of ownership has been formally noted in the land title (HGB) document No. 5, No. 6 and No. 7 by the District Land Administration Office of Kotawaringin Timur.

In Tangar Estate PT. BAP lease some of land to PT. MKA for establishment of mill, as shown by document of:

- Permits location for Palm Oil Mill of PT. MKA with an area 21 hectares from local authority of Kotawaringin Timur District
- Building Permit number 979.3/174/KPPT/II/2013 from local authority
- Lease agreement between PT. BAP and PT. MKA dated October 10, 2011 for the HGU concession area of 21

hectares in PT. BAP.

Based on document verification found information that all land title area comes from state ownership. Beside that, there was no private or community owned status in those area. So, there was no land acquisition process with surrounding peoples around the concession area. It implied there was no documentation of previous land-owner listed.

2.2.2

The company has had procedure for maintain of boundary poles (SOP/SMART/CERs-EHSD/SADV/II/004 regarding Maintenance of HGU / HGB boundary marker). According to the procedure, boundary poles will be checked once a year. Scheduled maintenance (circle weeding) conducted every 3 months and re-painting once a year.

During the audit, auditor has visited boundary poles randomly in SSRE and BTGE. All boundary poles that visited are in place. For example:

- Boundary poles BAP 126 Block O21 Division 6 SSRE.
- Boundary poles BAP 127 Block O20 Division 6 SSRE.
- Boundary poles BAP 14 and 15 Block N82 Division 4 BTGE.

To ensuring clear separation between land title (HGU) areas with private owned of local peoples, the company has build huge trenches around the land title area.

2.2.3

According to the notes of national land ministry of Indonesia on 1997 informed that all land title area comes from government state and zero occupied of surrounding peoples. Based on interview with management and village representatives of Rungau Raya and Pantap Village, there was no indication of land dispute. It also informed by plantation agency staff of Seruyan District that there was no land dispute record at least in 5 year before.

During the field visit, auditor found 2 Ha occupied area in HCV (block O21 Division 6 SSRE) by Rungau Raya villagers. Based on that, CH has conducted a meeting with respected people on 16 May 2019. CH also showed and socialized the Head of Seruyan District No: 188.45/66/2017 dated on 16 January 2017 regarding on appointed of ±625.40 Ha HCV area in PT. Binasawit Abadipratama.

2.2.4

According to the notes of national land ministry of Indonesia on 1997 informed that all land title area comes from government state and zero occupied of surrounding peoples. Based on interview with management and village representatives of Rungau Raya and Pantap Village, there was no indication of land dispute. It also informed by plantation agency staff of Seruyan District that there was no land dispute record at least in 5 year before.

If any land dispute cases, CH has had the documented procedure to handling within document number SOP/SPO /SMART/LH-04, dated July 1, 2010 and approved by the Division Head of Environment Department and the Sustainability. The procedure explained structural conflict settlement mechanism, which is aimed at securing relationships and communication between the community living around the plantation with the company in particular regarding the land ownership and land conflict resolution in accordance with applicable laws and regulations.

2.2.5

Based on interview with management and village representatives of Rungau Raya and Pantap Village, there was no indication of land dispute. It also informed by plantation agency staff of Seruyan District that there was no land dispute record at least in 5 year before.

2.2.6

Based on interview with management and village representatives of Rungau Raya and Pantap Village, there was no indication of land dispute. It also informed by plantation agency staff of Seruyan District that there was no land dispute record at least in 5 year before.

	Status: Comply	
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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

Documentation verification shows that the entire HGU area are originated from conversion of state forest area. During land clearing process, there are no private land ownership identified, as well as communal traditional / customary rights (confirmed with report of Land Title Verification Committee (Committee B) of Central Kalimantan Province dated July 10, 1996 and State Forest Area Conversion dated January 29, 1996).

In the other hands, Certificate holder has had a FPIC procedure No. SOP/SMART/SENS-CSR/SADV/II/003, describes that identification of participatory map related to legal ownership of communities are considering gender, community leader, local or transmigrant communities, ethnic groups or communal land ownership, etc.

Based on the Report of HCV and SIA (Social Impact Assessment) indicated that there is no customary rights or indigenous people near the concession area. This has been confirmed with the result of interviews with village heads of Rungau Raya and Pantap Village.

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

The CH has longterm business management plan for period 2018 to 2023, issued by Chief Finance Officer (CFO) *Perkebunan Sinar Mas* Region 6 (PSM 6). Among parameter covers are target of production (FFB, CPO and PK), production cost, operational cost, product price, inflation factors, revenue, replanting, area statement, etc. For example, projection of FFB production from 2019 to 2023 are 483,027 mt; 474,685 mt; 440,999 mt; 351,806 mt; and 238,280 mt, respectively. Furthermore CPO price per kg on the same period is predicted for about IDR 8,329; IDR 8,687; IDR 9,060; IDR 9,450; and IDR 9,856, respectively. Management unit stated that the business plan are subjected to changed and reviewed annually by the respective management through considering actual trends and dynamic situation which predicted could be changed in the future. The objective of annual review is to optimize the company resources to obtain a satisfactory goal. The longterm plan was extracted more details in annual budget plan which prepared by the Estate Manager. The CH has no plan for smallholders scheme.

3.1.2

According to Procedure No. SOP/SMART/MCAR/II/TA-PRP (Rev.0.0) dated 2012, it was known that criteria of replanting are palm age has reach 25 years, palm height is more than 13 m, production has less than 14 ton/ha/year and planting density has less than 100 palms/ha. Estate management stated that currently replanting program is refers to planting age of palms. Thus, based on hectare statement review, it was known that palms in PT BAP were planted in 1996 to 2005. Hence, estate management informed that replanting is expected to be carried out as early on 2021 or 2022 in SSRE and TRWE. According to replanting program and realization data, it could be concluded that first replanting will be conducted on SSRE and TRWE in 2021 for about 249.51 ha and 852.98 ha, respectively. As in progress, currently SRGE unit has prepare land clearing for nursery area in Division 1 Block N23 for about 11.00 ha.

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

There is no revision of procedure of oil palm agronomy, oil palm processing and palm oil supply chain. Based on procedure review, it could be concluded that the oil palm agronomy and processing procedures were still relevant with current situation and covers all main aspects from the field to the factory. Furthermore, procedure of occupational health and safety aspect has refers to HIRAC and MSDS of the respective agrochemical products, used by mill and/or estate

management. All procedures were available in Bahasa. Based on interview with workers in SRUM, SSRE and BTGE, it could be concluded that all workers are able to explain and demonstrate their technical matters, as well as safety aspect in working practices. All workers were equipped with proper PPE as required by HIRAC.

Company internal audit has only limited on mill and its supply base which included on audit scope. However, description of technical procedure included safety aspect, as well as its implementation by contractor has declared on the work agreement. Monitoring has conducted directly on the field through socialization, daily safety briefing and inspection by estate or mill management.

4.1.2

All estates has procedure of oil palm agronomy while for mill has procedure of oil palm processing as mentioned in Indicator 4.1.1. Training towards technical works matters, included safety has conducted annually as presented in Indicator 4.8.1 and 4.8.2. Procedure No. SOP-ISCC/IMT/OIA (Rev 0) dated 01 July 2011 mentioned that mechanism monitoring on consistency of procedure implementation is conducted through Operational Internal Audit (OIA) which conducted every semester in the estate and mill. CH management is able to shows OIA report for SRUM, SSRE and BTGE, which presented in several document as follows:

- OIA SRUM is presented in document No. 01/OAI/SRUM-Sem II 2018/10/18 dated 09 April 2019.
- OIA SSRE is presented in document No. 02/OIA/Kaltengsel-SSRE/05/18 dated 08 May 2018.
- OIA BTGE is presented in document No. 33/OIA?kaltengsel-BTGE-12/18 dated 21 January 2019.

4.1.3

Record of monitoring and its evaluation is presented in several documents, for example as follows:

- Daily operational record which presented in program of System Application and Product (SAP), which informed operational data such as FFB production, FFB grading results and product quality.
- Memorandum of OIA. All critical parameter points describes were need to be response and follow up by the respective person in charge (PIC) through action plan immediately. Progress of action plan were reported and submitted directly to the upper ordinate. Later on, each (priority) points were discussed, analyzed and presented in monthly meeting by Manager.

4.1.4

SRUM has only receive FFB from its own estates and has no cooperation off FFB supply with other Sinarmas Group, other company and smallholders. The CH has implementing Integrated Preserved Supply Chain Certification System.

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

Procedure of soil fertility management is presented in procedure No. SOP/SMART/MCAR/IX/TA-PPK dated 12 June 2012 about manuring. Procedure mentioned that dosage of fertilizer application program on the nursery, immature and mature areas shall be based on Agronomist of SMARTRI recommendation as refers to leave and soil sampling analysis. Furthermore there is several work instruction (WI) related to this matters for example WI No. IK No. IK/SMART/MCAR/IX/TA-PPK/02 dated 26 March 2012 about manuring of legumes and land cover crop; WI No. IK No. IK/SMART/MCAR/IX/TA-PPK/03 dated 26 March 2012 about anorganic manuring on immature area; and WI No. IK/SMART/MCAR/IX/TA-PPK/04 dated 26 March 2012 about empty fruit bunches (EFB) mulching in immature area. According to manuring recommendation program in 2018/2019, it could be concluded that calculation of fertilizer rates were derived from leaf and soil analysis. Furthermore, actual time of application has follows the schedule recommended by SMARTRI Agronomist. Moreover, according observation to Division 4 Block P38 SSRE, it was found that by-product of EFB has mulched on the palm circle for nutrient cycle purposes. Dosage recommended and implemented was 40 ton FFB/ha/year of about 300 kg/palm/year.

4.2.2

Estate management shows manuring program and realization for period 2018/2019. According to manuring record review, it was known that manuring program in 2018 for SSRE and BTGE has been fully completed on 07 January

2019. Report of manuring program realization for SSRE and BTGE are presented in document dated 06 May 2019 and 30 April 2019, respectively. According to the fertilizer application schedule, the actual application has in line and fulfilled the program. Furthermore, the company has monitor the used of fertilizers and documented properly. Among fertilizer applied are Urea, TSP, RP, MOP, Kieserita, Dolomite HGFB and CuSO₄.

4.2.3

Procedure No. SOP/SMART/MCAR/IX/TA-PPK about manuring mentioned that leaf and soil sampling for annual manuring program purposes shall be conducted annually and every five years, respectively. Both sampling is carried out by SMART Research Institute (SMARTRI) team. The results has also been used for soil fertility monitoring and evaluation. Leaf analysis results for SSRE and BTGE which used as reference for period 2019 manuring recommendation are presented in document Ref. No. 415/DAUN/LAB-SMARTRI/VI/2018 dated 30 June 2018 and Ref. No. 378/DAUN/LAB-SMARTRI/VI/2018 dated 26 June 2018, respectively. Furthermore, soil analysis results for the former and the latter estate are presented in document Ref. No. 016/TANAH/AL/ANLZ/02/14 dated 26 February 2014 and Ref. No. 007/TANAH/AL/ANLZ/02/14 dated 19 February 2014, respectively. Among parameter tested on leaf analysis are dry matter content of macro nutrients (N, P, K, Mg and Ca) and micro nutrients (B, Mn, Zn, Cu, Cl and Fe). Moreover, parameter tested on soil analysis are soil texture, pH, organic C, N-total, C/N ration, available P, cation exchange capacity, saturation base and dry matter of nutrients content.

Estate management informed that some corrections of fertilizer rates recommended has also made by visual observation towards palms figure and color assessment by the Agronomist to adjust specific additional fertilizer input if there were nutrient deficiency detected. Furthermore in certain situation, inorganic fertilizer could be substitute by organic fertilizer. For example, source of K nutrient from MOP could be substitute by EFB.

4.2.4

Apart from chemical fertilizers application, the CH had a strategy of nutrient cycle from oil palm processing by-products such as empty fruit bunch (EFB) and palm oil mill effluent (POME). The latter is only applied on the permitted Blocks in SRGE, while the former is applied in all estates. Moreover, pruned fronds during harvesting activity has indirectly considered as nutrient cycle strategy. Rates of EFB application was about 40 ton EFB/ha/year or about 300 kg EFB/palm/year, meanwhile rates for land application was 375 m³/ha/year. For example, EFB application as fertilizer substitution in SSRE for period 2018 and 2019 are 16,078.70 mt and 1,663.00 mt, respectively. Meanwhile, EFB application as nutrient supplementary on BTGE in 2018 is 2,399.30 mt. Based on observation to Division 4 Block P38 SSRE, it was known that EFB has been mulched in accordance with the procedure, where placed on the edge of palm circle. The Foreman and applicators informed that dosage applied was 40 ton EFB/ha/year.

Status: Comply

4.3

Practices minimize and control erosion and degradation of soils.

4.3.1

The CH is able to shows Soil Map with scale 1:35,000 and 1:50,000 which derived from soil survey semi detail report, conducted by Plantation Monitoring and Planning (PNMP) Division in 2009. According to the report, it was informed that there was a presence of peat soil (*Typic Haplosaprist*) which covers a small portion in TNGE for about 39.24 ha or only 0.88 % from total TNGE area. The peat is considered shallow as the depth is less than 1.00 m. Furthermore, according to the summary of land suitability of PT BAP, it was known that about 83.60 % of PT BAP area is classified as slightly suitable (S2) with minor limitation for oil palm cultivation. However, there are marginal (S3) and currently not suitable (N1) area which covers about 6.90 and 9.50 %, respectively. Moreover, there is no presence of area with slope more than 40 %. However, there is concentration of hilly area in BTGE which covers about 4.40 % from PT BAP total area. Thus, it could be concluded that there is no presence of fragile soils within PT BAP operational areas. Limitation of soil for oil palm cultivation are mainly due to domination of sandy soil texture, very low fertility, hilly area and drainage problem.

4.3.2

As informed in Indicator 4.3.1, it was known that in general slope condition in PT BAP were dominantly flat, followed by undulating. There is no presence of area with slope >40 %. However, there is spotted hilly area within estate operational areas. To overcome limitation on hilly area, several method had implemented which refers to procedure No.

SOP/SMART/MCAR/II/TA-PPA about planning of land preparation on new planting and No. SOP/SMART/MCAR/IV/TA-PLB about new land clearing, such as by making terraced planting pattern on hilly areas for soil conservation, planting of vertiver grass, proper pruned fronds placement parallel to contour line and conducting erosion monitoring. However, dominant limitation on PT BAP was mainly due to poor drainage properties, presence of sandy soil texture and very low fertility, instead of slope limitation.

4.3.3

Program of road maintenance has found on annual budget plan which included on Budget of transportation cost. Road maintenance activities were consist of manual maintenance such as cover crop clearance, pruning on collection road, surface reparation through laterites, road grading and road compaction. SSRE and BTGE are able to shows recapitulation of road maintenance realization included mechanic and manual method for period 2018 as presented in report dated 07 January 2019, approved by Estate Manager, Head of Assistant and Assistant Division. The daily record was shows on road compaction map, heavy machinery work record and mandor work book. Based on Daily Working Plan in SSRE and BTGE, it was spotted manual road maintenance activity which conducted on Division 6 Block Q17 SSRE. Furthermore, based on filed overview, it was known that road conditions were generally well maintained and easily passable by transportation unit.

4.3.4

As mentioned in Indicator 4.3.1, it was known that there is a presence of peat soil (*Typic Haplosaprist*) which covers a small portion in TNGE for about 39.24 ha or only 0.88 % from total TNGE area. The peat is located on Division 3, Block Q54-55, Block R54-55 and Block S54-56. The peat is considered shallow as the depth is less than 1.00 m. Procedure No. SMA/MCAR/03/05-07 dated 01 May 2007 about land preparation before planting and procedure No. SMA/MCAR/04/05-07 dated 01 May 2007 about road and bridge and procedure No. No. SMA/MCAR/05/05-07 dated 01 May 2007 about land clearing and planting, has mentioned that planting preparation on peat areas were consist of peat depth maesurement, peat properties investigation, watermanagement plan and peat subsdence monitoring through maintaining water level and water table on 50-70 cm. Field drain with pattern 1:2, 1:4, 1:8 and 1:12 is recommended as needed and depending on field condition.

TNGE management is able to shows monitoring of water level and water table (piezometer) records which presented in Form No. F/SMART/HVMS-EVMD/USDV/005/001 and No. F/SMART/HVMS-EVMD/USDV/005/002, respectively. In general water level and water table for period 2018 and 2019 were ranged beetwen 40 to 60. The former figure was due to high rainfall in 2018 and early 2019. Furthermore, monthly peat subsidency monitoring is presented in Form No. F/SMART/HVMS-EVMD/USDV/005/004. For example, peat subsidency rate in Block R54 and S55 for period 2018 to 2019 were 0.00 cm/year.

4.3.5

Since peat area has only covers a very small portion, or about <1.00 % of total TNGE and < 0.20 % of total PT BAP, as well as it was surrounded by mineral soil area, drainability study on that particular areas for replanting purposes is considered not necessary.

4.3.6

As mentioned in Indicator 4.3.1 and 4.3.2, it was known that dominant soil limitation on PT BAP for oil palm cultivation were mainly due to poor drainage properties, presence of sandy soil texture and very low fertility, instead of slope limitation. To overcome such limitation, estate management has implementing several strategy on the filed such as:

- By products applications toward EFB mulching and land application which aims to enhance organic matters, retain soil moisture and additional input for nutrient K and N, respectively.
- Installation of field drain on peat area and water management on peat area.
- Fertilizer application as in accordance with SMART Research Institute Agronomist recommendation

Status: Comply

4.4

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

4.4.1

High conservation values identification on 2012 and Environment Evaluation Study report indicates that water sources

that identified were surface water such as Seruyan river and Rungau river.

PT Binasawit Abadi Pratama has 2018 water management plant document consists of identifying water sources, water saving socialization on housing, water sources protection and rehabilitation, water quality testing, and signboard placement on riparian for zero chemical activities. According to environment monitoring program analysis, it was informed that the company activity has not affect the value of BOD and COD in the downstream, since the figure in the upstream is already above the standard required. Moreover, domestic housing well and consumption water from well testing analysis shows that all parameters are still relevant with standard quality. Interviews with housing residents on SSRE and BTGE acquired information that water quality from well are good enough to use as daily needs such as (bath, wash, and lavatory).

4.4.2

Company has identified and shown the maps for catchment areas (including riparian) on 1:50000 scale for PT BAP. HCV identification document shown there is some river stream on PT. BAP such as Rungau river dan Seruyan riverflow. Company provided procedures for these catchment areas protection/conservations listed on SOP/SPO/SMART/LH-06-07. Field visit during audit, for examples on seruyan riparian block R31 (SSRE), and Rungau riparian block Q34 div 4 acquired information that company shown proper ways for maintain and protect the catchment area for example manual weeding and marking the chemical boundary border.

4.4.3

Field visit on Sungai Rungau Mill effluent pond indicates there is no environmental pollution caused by POME management activities. Sungai rungau Mill has nine waste water treatment plant pond (each capacity are 10000 m³) and regularly conduct waste water testing every month and then waste water discharge to Sungai Rungau estate as land applications based on Decree Head of Seruyan Regent, Seruyan Regency No. No. 188.45/38/2015. Document review of waste water testing quality indicates all waste water distributes to land applications are still comply with standard quality for examples : BOD on March 2019 are 1406 mg/l(< 5000 mg/l) and pH are 7,18.

4.4.4

Water usage monitoring was done periodically and recorded by WTP operator on daily basis, for example on April 2019 FFB processed 34912 mt, process water usage 37195 m³, and water usage efficacy was 1.07 m³/mt FFB processed. Standards of water usage for FFB process recorded on 2019 budget projected 1.00 - 1.24 m³/mt FFB processed. Procedure for Mill water usage and monitoring are provided and has been listed on procedures SOP/SMART/MCMD/I/TM/PKS. Observations on Sungai Rungau mill water treatment plant found monitoring for raw and process water usage was done by officer periodically, and flowmeters at inlet/outlet serves normally. Sungai Rungau mill also has calibration certificates for flowmeters, which conducted by CV Pra Kalibrasi on August 21 2018.

Status: Comply

4.5

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

4.5.1

The CH has committed to implement integrated pest management (IPM) activities in which presented in several procedures, i.e. procedure No. SOP/SMART/MCAR/VIII/TS-PGM dated 12 June 2012 about weeds control which covers weeds control in the nursery, immature and immature areas, equipment used for weeds control, safety procedures of control, guideline of agrochemicals uses (include paraquat) and monitoring; and No. SOP/SMART/MCAR/VII/TA-HPT dated 12 June 2012 about Pests and Diseases (P&D) Control Management which covers early warning system, census, P&D attack threshold limits, evaluation and decision of pest and disease control, recommendation from SMARTRI (Research Department), P&D handling, recommendation of P&D control and evaluation. The details of P&D control has presented in several work instruction (WI), for example WI No. IK/SMART/MCAR/VII/TA-HPT/01 about leaf eating caterpillar detection; WI No. IK/SMART/MCAR/VII/TA-HPT/02 about leaf eating caterpillar census; WI No. IK No. IK/SMART/MCAR/VII/TA-HPT/03 about leaf eating caterpillar control; and WI No. IK/SMART/MCAR/VII/TA-HPT/07 about census and management of rats.

Several IPM activities which had conducted in 2019 is presented as follows:

- **Early Warning System and Census Analysis:** Based on detection and census of leaf eating caterpillar (LEC) and

rat in SSRE and BTGE for period January to April 2019, it was known that incidence level were all below threshold limit. Among LEC founded are bagworm (i.e. *Mahasena corbetii*, *Mahasena plana* and *Clania Sp.*); Caterpillar (i.e. *Darna Trima*, *Setora nittens*, *Thosea bisura*, *Setothosea Asigna*, *Thosea vetusta* and *Ploneta diducta* and *Amanthusia phidippus*). Thus, there is no record of insecticide and rodenticide application up to April 2019.

- **Biological Method for Pest Population Control:** The CH has conducting beneficial plants (*Turnera subulata*, *Antigonon leptopus* and *Cassia cobanensis*) for leaf eating caterpillar and bagworm population control. This is confirmed during field observation along mainroad and collection road. Sighted plastic mulching for *Turnera subulata* planting site in Division 5 Block R31 SSRE. Furthermore, the CH has adopting barn owl (*Tyto alba*) for rat population control, as observed to Barn Owl Box in Division 3 Block S31 and Division 5 Block R31 SSRE and Division 4 Block N75 BTGE. There is also Barn Owl Sanctuary as observed in Division 2 Block P68 BTGE, which found three juvenile Barn Owls. Estate management informed that every barn Owl Box is expected to cover rats population in radius 25 to 30 ha.
- In order to avoid P&D (include weeds) resistance and prophylactic uses of pesticide, estate management had substitute and/or rotate the use of pesticides for the same target, for example, in term of broad leaf control such as *Ageratum conyzoides*, *Boreiva alata* and *Mikania micrantha*, the use of Erkaforon 20 WG (Methyl metsulfuron) could be substitute with Roll Up 480 SL (Isoprophyl amine glyphosate). Moreover, biological control has also adopted as mentioned above.

4.5.2

The CH has conducting several trainings which aims to maintain workers knowledge and skills towards P&D management, for example as follows:

- Training of integrated pest management in SSRE and BTGE had conducted on 15 March 2018 in SRGE Club House, attended by all Foreman and Census workers of PT BAP.
- Training of weed management, MSDS, Hazardous symbols and safe working practices had conducted on 16 March 2018 in SRGE Club House, attended by all Foreman and Pesticide Applicators of PT BAP.

As on training program schedule, training in 2019 will be conducted on June 2019. Based on field observation and interview with Foreman and Pesticide Applicators in Division 3 Block S31 SSRE and Division 4 Block N75 BTGE, it could be concluded that the workers were able to explained and demonstrate several technical skills such as PPE used, spraying techniques and prohibited application areas such as HCV and riparian areas which marked with red-cross on palm trunks.

Status: Comply

4.6

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

4.6.1

Procedure No. SOP/SMART/MCAR/VII/TA-HPT dated 12 June 2012 about Pests and Diseases (P&D) Control Management mentioned that the use of agrochemical should be based on census analysis evaluation when the level of incidence is more than threshold limits. Furthermore, for weeds control purposes, work instruction No. IK/SMART/MCAR/VIII/TA-PGM/03 dated 26 March 2012 has describes weeds control on the palm circle, harvesting path, FFB platform, rotation, pesticides uses, type of weeds and recommendation of pesticides. Furthermore, the CH also has Memorandum of President Director No. 044/PD/IX/2014 dated 21 November 2014 and No. 032/PD/VIII/2016 dated 13 August 2015 which mentioned that there will be no paraquat starting from 2016. Estate management has only implementing 3 types of pesticide with active ingredient/substance *Isopropilamina Glifosat*, *Metil Metsulfuron* and *Amonium Glufosinat*. Those pesticides mentioned in the former were listed in Pesticide and Fertilizer Directorate through http://pestisida.id/simpes_app/rekap_formula_nama.php?s_kategori=umum. Furthermore, according to pesticide used record in 2018/2019 and observation to Pesticide Store in SSRE and BTGE, it was known that pesticides has only used for weeds control and there is no paraquat on the stock. In order to avoid P&D (include weeds) resistance and prophylactic uses of pesticide, estate management had substitute and/or rotate the use of pesticides for the same target, for example, in term of broad leaf control such as *Ageratum conyzoides*, *Boreiva alata* and *Mikania micrantha*, the use of Erkaforon 20 WG (Methyl metsulfuron) could be substitute with Roll Up 480 SL (Isoprophyl amine glyphosate). Furthermore for biological control purposes, the CH has conducting beneficial plants (*Turnera subulata*, *Antigonon leptopus* and *Cassia cobanensis*) for leaf eating caterpillar and bagworm population control. This is confirmed during field observation along mainroad and collection road. Sighted plastic mulching for *Turnera subulata* planting site in

Division 5 Block R31 SSRE. Moreover, the CH has adopting barn owl (*Tyto alba*) for rat population control, as observed to Barn Owl Box in Division 3 Block S31 and Division 5 Block R31 SSRE and Division 4 Block N75 BTGE. There is also Barn Owl Sancturay as observed in Division 2 Block P68 BTGE, which found three juvenile Barn Owls. Estate management informed that every barn Owl Box is expected to covers rats population in radius 25 to 30 ha.

Based on field observation and interview with Foreman and pesticide applicators in Division 3 Block S31 SSRE and Division 4 block N75 BTGE, it could be concluded that the workers were able to explain and demonstrate its job in accordance with the procedure, such as justification of pesticide usage, considering wind flows during spraying, pesticide mixing, pesticides and its target, prohibited areas to be sprayed (for example HCV, conservation area and riparian zone, which were marked with red-cross mark on the palm trunks), PPE's to be used, as well as its management. Pesticide applicators has also mentioned that pregnant and breastfeeding women are strictly prohibited to works related with agrochemicals.

4.6.2

Record of pesticide applied is presented in document of "Recor of Pesticide Used on Applied Area", for example, application in April 2019 is presented as follows:

Pesticide	LD-50	SSRE		BTGE	
		(l or kg)	(as/ha)*	(l or kg)	(as/ha)*
Roll Up 480 SL	>5,000 mg/kg	238,71	0,105	117,25	0,067
Erkafuron 20 WG	>5,000 mg/kg	16,22	0,004	14,43	0,006
Rolifos150 SL	>5,000 mg/kg	4,95	0,029	3,41	0,056

(Note: as: active substance)

The CH has satisfactory records and monitor the used of pesticides.

4.6.3

Program and realization of pest management was presented in monthly report which describes EWS and census analysis, biological control and pesticide application, for example as follows:

- **Early Warning System and Census Analysis:** Based on detection and census of leaf eating caterpillar (LEC) and rat in SSRE and BTGE for period January to April 2019, it was known that incidence level were all bellow threshold limit. Among LEC founded are bagworm (i.e. *Mahasena corbetii*, *Mahasena plana* and *Clania Sp.*); Caterpillar (i.e. *Darna Trima*, *Setora nittens*, *Thosea bisura*, *Setothosea Asigna*, *Thosea vetusta* and *Ploneta diducta* and *Amanthusia phidippus*). Thus, there is no record of insecticide and rodenticide application up to April 2019.
- **Biological Method for Pest Population Control:** The CH has conducting beneficial plants (*Turnera subulata*, *Antigonon leptopus* and *Cassia cobanensis*) for leaf eating caterpillar and bagworm population control. This in confirmed during field observation along mainroad and collection road. Sighted plastic mulching for *Turnera subulata* planting site in Division 5 Block R31 SSRE. Furthermore, the CH has adopting barn owl (*Tyto alba*) for rat population control, as observed to Barn Owl Box in Division 3 Block S31 and Division 5 Block R31 SSRE and Division 4 Block N75 BTGE. There is also Barn Owl Sancturay as observed in Division 2 Block P68 BTGE, which found three juvenile Barn Owls. Estate management informed that every barn Owl Box is expected to covers rats population in radius 25 to 30 ha.
- In order to avoid P&D (include weeds) resistance and prophylactic uses of pesticide, estate management had substitute and/or rotate the use of pesticides for the same target, for example, in term of broad leaf control such as *Ageratum conyzoides*, *Boreiva alata* and *Mikania micranta*, the use of Erkafuron 20 WG (Methyl metsulfuron) could be substitute with Roll Up 480 SL (Isoprophyl amine glyphosate).

4.6.4

The CH has list of pesticide which classified on WHO 1A and 1B, as listed on WHO Recommended Classification of Pesticides by Hazard and Guidelines to Classification 2009 by IPCS (International Programme on Chemical Safety). Memorandum of President Director No. 044/PD/IX/2014 dated 21 November 2014 and No. 032/PD/VIII/2016 dated 13 August 2015 mentioned that there will be no paraquat in Sinar Mas Group starting from 2016. Based on pesticide used record in 2018/2019 and observation to Pesticide Store in SSRE and BTGE, it was known that pesticides has only used for weeds control and there is no paraquat and Pesticide classified as 1A, 1 B and/or listed in Stockholm or Rotterdam

Convention on the stock. All pesticides used by the CH were listed on www.pestisida.id by Department of Agriculture, Republic of Indonesia.

4.6.5

Procedure of pesticide handling has presented in document No. SOP/SMART/MCAR/VIII/TS-PGM dated June 12th 2012 about weeds control which covers weeds control in the nursery, immature and immature areas, equipment used for weeds control, safety procedures of control, guideline of agrochemicals uses (include paraquat) and monitoring. Furthermore, several procedure and work instruction has also used as a guideline, such as procedure No. SOP/SPO/SMART/LH-09 about waste management and work instruction No. IK/SPO/SMART/LH-09/01 about stage of eks pesticide containers handling (washing and cleaning). Moreover, Estate management mentioned that Personal Protective Equipment (PPE) for Pesticide Applicators has refers to MSDS of pesticide product, HIRAC and procedure No. SOP/SMART/HESS-EHSD/SADV//010 Chapter 3.

The CH has conducting several trainings which aims to maintain workers knowledge and skills towards pesticide management and handling, for example training of weed management, MSDS, Hazardous symbols and safe working practices had conducted on 16 March 2018 in SRGE Club House, attended by all Foreman and Pesticide Applicators of PT BAP. There is also socialization on prohibition of pregnant and breast feeding workers to works related to pesticide application, which conducted in 13-14 February 2018. Based on observation to Division 3 Block S31 SSRE and Division 4 block N75 BTGE, it was konwn that Pesticide Applicators has equipped with PPE as mentioned in those related reference, such as face shield helmet, respirator, apron, wearpack set, boots and rubber gloves. The PPE could be replaced when broken or unproper to be used. Furthermore, based on interview with Foreman and pesticide applicators, it could be concluded that the workers were able to explain and demonstrate its job in accordance with the SOP, such as justification of pesticide usage, considering wind flows during spraying, pesticide mixing, pesticides and its target, prohibited areas to be sprayed (for example conservation area and riparian zone, which were marked with red-cross on the palm trunks) as well as PPE's to be used and its management (placement). Pesticide applicators has also mentioned that pregnant and breastfeeding women are strictly prohibited to works related with agrochemicals. Furthermore, based on field observation to Pesticides Store in SSRE adn BTGE, it was found that all MSDS were available and match with pesticide stocks, symbols of risk and hazardous level were displayed properly. There are special place used for pesticide mixing and PPE's place in both estates. Moreover, based on observation to employees housing complex area in SSRE and BTGE, it was known that there is no reuse of used pesticide containers for household purposes.

4.6.6

Procedure for pesticide and used pesticide containers placement is presented in document procedure No. SOP/SMART/LEMS-EHSD/SADV//002 about waste management and work instruction No. IK/SPO/SMART/LH-09/01 about stage of eks pesticide containers handling (washing and cleaning). This matter has also refers to pesticide MSDS. Pesticide should be placed on chemical storage, while used pesticide containers shall be delivered and placed in the permitted Hazardous Material Store, and prohibit to be use for household purposes, unless reuse for related pesticide application activities. Used containers has been managed as refers to PP No. 101 in 2014. Based on observation to Hazardous Waste Store in SSRE and BTGE, it was known that used pesticide containers were placed properly and delivered to the permitted collector (PT Semesta Langgeng Sentosa). Furthermore, as observed on employees housing complex area, it was known that there is no reuse of used pesticide containers for household purposes, plant pot and water containers. Detail on used pesticide containers record is presented in Indicator 5.3.2.

4.6.7

Estate management mentioned that the use and handling of pesticide has refers to several document, such as Material Safety Data Sheet (MSDS) of pesticide products, and Hazard Identification Risk Assessment Control (HIRAC) for estate, procedure No. SOP/SMART/MCAR/VIII/TS-PGM dated June 12th 2012 about weeds control, procedure No. SOP/SPO/SMART/LH-09 about waste management, work instruction No. IK/SPO/SMART/LH-09/01 about stage of eks pesticide containers handling (washing and cleaning). All reference mentioned in the former has covers guideline of storage and handling of pesticides, handling of accident and first aid, risk identification, pesticides spills and leaks handling, PPE, physical and chemical properties, reactivity and material stability, toxicology and ecology information, perticide wastes handling and transportation.

The CH has conducting several trainings which aims to maintain workers knowledge and skills towards safe pesticide application. For example, training of weed management, MSDS, Hazardous symbols and safe working practices had conducted on 16 March 2018 in SRGE Club House, attended by all Foreman and Pesticide Applicators of PT BAP. Based on training program 2019, the same training in 2019 will be carried out in June 2019. Based on interview with Foreman and pesticide applicators in Division 3 Block S31 SSRE and Division 4 block N75 BTGE, it could be concluded that the workers were able to explain and demonstrate its job in accordance with the SOP, such as justification of pesticide usage, considering wind flows during spraying, pesticide mixing, pesticides and its target, prohibited areas to be sprayed (for example conservation area and riparian zone, which were marked with red-cross on the palm trunks) as well as PPE's to be used and its management. Pesticide applicators has also mentioned that pregnant and breastfeeding women are strictly prohibited to works related with agrochemicals. Furthermore, based on field observation to Pesticides Store in SSRE and BTGE, it was found that all MSDS were available and match with pesticide stocks, symbols of risk and hazardous level were displayed properly. There are special place used for pesticide mixing and PPE's place in both estates. Moreover, based on observation to employees housing complex area in SSRE and BTGE, it was known that there is no reuse of used pesticide containers for household purposes.

4.6.8

Based on information from estate management, surrounding communities and Government Institutions of Seruyan Regency, it was known that there is no aerial pesticide application in PT BAP. The CH has only apply pesticide manually by spraying equipment.

4.6.9

The CH has conducting several trainings which aims to maintain workers knowledge and skills towards pesticide handling. For example, training of weed management, MSDS, Hazardous symbols and safe working practices had conducted on 16 March 2018 in SRGE Club House, attended by all Foreman and Pesticide Applicators of PT BAP. Based on training program 2019, the same training in 2019 will be carried out in June 2019. PT BAP do not have smallholders cooperation scheme.

Based on interview with Foreman and pesticide applicators in Division 3 Block S31 SSRE and Division 4 block N75 BTGE, it could be concluded that the workers were able to explain several pesticide handling such as PPE's to be used, as well as its management, and pesticide placement. Pesticide mixing should be carried out in the special place provided by estate management. Used water were later on to be reused for the next mixing. Used pesticide containers should be placed on Hazardous Material Store and could be reuse for the same purposes. Reuse for domestic purposes in housing area is strictly prohibited. Pesticide applicators has also mentioned that pregnant and breastfeeding women are prohibited to works related with agrochemicals. Furthermore, based on observation to housing area in SSRE and BTGE, it was known that there were no reuse of pesticide containers for domestic household purposes. Record of used pesticide containers on Hazardous Store were available.

4.6.10

Based on document review and field visit on chemical storage shown that during 2019, company only use 3 types pesticides (erkafuron, roll up, and rolifos). Sungai Seruyan estate and Bukit tiga estate shown that agrochemicals containers are disposed based on MSDS i.e. clearly washed on pesticides optimization storehouse and regularly submitted to related third party i.e. PT Semesta Langgeng Sentosa (last shipment conducted on April 2019). All evidence for ex agrochemical disposal for examples "*Berita acara pengiriman bekas kemasan pestisida*" to related third party vendor are available and verified by auditor. Both estates, SSRE and BTGE were implemented proper ways for waste disposal based on procedure SOP/SMART/LEMS-EHSD/SADV/002/001).

4.6.11

The company has a list of workers serving as pesticide operators as follows:

- Bukit Tiga Estate as many as 19 pesticide applicators (15 sprayers and 4 foremen) consisting of 7 female workers and 12 male workers.
- Sungai Seruyan Estate with 24 pesticide applicators (17 sprayers and 7 foremen) consisting of 17 female workers and 7 male workers.

The company has a routine medical surveillance record (health check) for all workers who work with chemicals in each

unit. Health checks are carried out routinely every year, the following are the results of inspections conducted by the company on 18 to 23 March 2019, namely:

- Sungai Seruyan Estate - Audiometry examination for 10 workers with the results of all workers stated in healthy and normal conditions (fit to work), spirometry inspection for 59 workers with results of all workers stated in healthy and normal conditions (fit to work), and cholinesterase examination for 59 workers (24 spray workers and 35 fertilizer workers) with the results that all workers were declared in a healthy and normal condition (fit to work).
- Sungai Rungau Mill - Audiometry examination for 74 workers with the results of all workers stated in healthy and normal conditions (fit to work), spirometry checks for 39 workers with results of all workers stated in healthy and normal conditions (fit to work), and cholinesterase examination for 30 workers with the results all workers stated in a healthy and normal condition (fit to work).
- Bukit Tiga Estate - Audiometry examination for 6 workers with the results of all workers stated in a healthy and normal condition (fit to work), spirometry inspection for 59 workers with the results of all workers stated in healthy and normal conditions (fit to work), and cholinesterase examination for 42 workers (19 spray workers and 23 fertilizer workers) with the results that all workers were declared in a healthy and normal condition (fit to work).

Based on interviews with spray and fertilizer workers in the Seruyan River and Bukit Tiga Estate it is known that workers have been routinely given health checks every 2 times a year and the last inspection was conducted in March 2019 with the results of all workers in good health.

4.6.12

The company has a policy related to preventing pregnant and lactating women from handling pesticides issued by VPA PSM-6 and listed in Memorandum No. 01 / VPA-RSPO / 03/2010 dated March 3, 2010. The memorandum instructs that female workers who are pregnant and breastfeeding are not allowed to work as sprayers or other work related to chemicals.

The company routinely conducts monthly menstruation checks and every 3 months checks pregnancy for all female workers to ensure that there are no pregnant and breastfeeding women workers who work in jobs related to chemicals. The following are the results of workers' inspection in April 2019:

- Results of examinations of 153 female workers at Sungai Seruyan Estate revealed that there were 4 female workers who were pregnant and would get H2 leave 1.5 months before giving birth and 1.5 months after giving birth. For pregnant and breastfeeding workers are not workers who do work related to chemicals.
- The results of examinations of 7 female workers in Sungai Rungau Mill revealed that there were no pregnant or breastfeeding women.

Based on the results of field visits and interviews with spray workers, it is known that currently there are no pregnant or breastfeeding workers who work as sprayers / fertilizers because the company has banned the existence of pregnant / nursing workers who work with chemicals. The company also conducts routine pregnancy checks every 3 months to ensure that no pregnant / lactating workers work with chemicals.

Status: Comply

4.7

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

4.7.1

The company's OHS policy has not changed since the previous assessment. The Occupational Safety and Health Policy was adopted on November 1, 2013 by the President Director of PT SMART which stated the company's commitment to:

- Communicate OHS policies and procedures to all employees and stakeholders to ensure that they understand the obligations associated with company activities.
- Comply with all applicable laws, regulations and other provisions related to OHS.
- Ensuring the application of OHS as part of the company's operational activities.
- Identify, assess and control the risks of hazards in each activity in the work environment with a continuous improvement approach to avoid accidents and PAK.
- Manage and monitor OHS indicators and make continuous improvements to improve OHS management

performance.

Based on observations in the operational environment of plantations and factories, it is known that the company already has a warning of OSH policy that is available at several points intended for media outreach to workers so that it can be easily known and understood.

The company has a K3 work program that is created every year to plan the implementation of OHS in plantations and factories. The program has been compiled for 2019 by the respective P2K3 management on January 9, 2019. The work program is the making of OHS goals & objectives, review & preparation of ISBPR, evaluation of OHS fulfillment, safety induction, P2K3 meetings, PPE distribution / replacement, monitoring PPE condition, monitoring & provision of first aid, OHS monitoring, competency certificate validity monitoring, work accident recapitulation, work accident investigation, worker health inspection, emergency response preparedness, OHS socialization activities, and routine P2K3 report reporting.

In implementing one of the OHS work programs and to implement and cultivate OHS discipline, the company carries out OHS inspections conducted monthly by P2K3 officers who are accompanied by General OHS Experts in each unit. The following are the results of the last inspection carried out by the company including:

- OHS Inspection activities on April 25, 2019 at Bukit Tiga Estate for OHS compliance and monitoring activities in warehouse management, office management, PPE washing activities, PPE storage, nursery, harvesting, spraying, FFB transport, fertilizing, maintenance and activities others with the results that all workers have been obedient in applying OSH in the work environment.
- OHS Inspection activities on May 21, 2019 at Sungai Seruyan Estate for OHS compliance and monitoring activities in warehouse management, office management, PPE washing activities, PPE storage, nursery, harvesting, spraying, FFB transport, fertilizing, maintenance and activities others with the results that all workers have been obedient in applying OSH in the work environment.
- OHS Inspection activities on May 20, 2019 at Sungai Rungai Mill for OHS compliance and monitoring activities in laboratory, grading, dispatch, compound, effluent plant, WTP, process and other activities with the result that all workers have been obedient in implementing OHS in the environment work.

4.7.2

Available Danger Identification and Risk Management (ISBPR) records are available in each work unit, including:

- Bukit Tiga Estate and Sungai Seruyan Estate have ISBPR established on January 5, 2019 for the period January - December 2019 which explains the sources of hazards, their impacts, identification of potential hazards, controls carried out and risk analysis for each of the activities in unit operational area. The identified activities are leaving & going home from work, TM maintenance, harvesting, warehouse activities, maintenance emplacement, workshop activities, polyclinic activities, Child Care Center (BPA), office offices, agrochemical mixing places, washing place for knapsack & ex sacks fertilizer, KTD training, security and fire tower. The determination of the ISBPR is based on the evaluation results from the previous year's ISBPR.
- Sungai Rungau Mill has an ISBPR established on January 9, 2019 for the period January - December 2019 which explains the sources of hazards, their impacts, identification of potential hazards, controls carried out and risk analysis for each activity in the operational area of the unit. The identified activities are starting & going home from work, activities at loading ramp stations, sterilizer stations, boiler stations, clarification stations, engine room stations, press stations, nutt & kernel stations, solar tanks, WTPs, laboratories and other activities. The determination of the ISBPR is based on the evaluation results from the previous year's ISBPR.

In the event of a work accident the company will conduct an accident investigation to be able to carry out evaluation activities and find the root cause of the accident. Then the company will conduct socialization related to accidents that occur to all workers. This is done so that workers become more careful and as a precaution so that the same incident does not recur.

The company has a OHS inspection procedure that is carried out every month to find out sources of danger and monitoring of emergency response equipment owned. In addition, the company has a work accident investigation procedure that is used to find out the initial identification of the accident, cause of the accident, analysis and actions

taken. Based on the results of the document review, it is known that all accidents that occur in the company have been investigated and reported to the relevant agencies.

4.7.3

The company has a training program for all workers in which it explains the techniques / safe working methods for each job. The training was given by the assistant along with the OHS Expert who was the P2K3 secretary. In addition, the company has workers who have received special OHS training / licenses / certifications related to several types of work provided by the relevant agencies.

The company has provided adequate and appropriate PPE for all workers in the workplace based on the identification of Hazard Sources and Risk Control which includes all potentially dangerous operational activities, such as the use of pesticides, machine operations, land preparation, and harvesting.

Based on the results of field observations in factories and plantations, it is known that all workers observed have used a proper PPE in accordance with the provisions stipulated in the ISBPR and no workers were found to have used a broken PPD. This is in line with the results of interviews with fertilizer, harvest and spray workers who stated that so far if the PPE used is damaged the workers will immediately request replacement from the company and the company will immediately replace the PPE with new PPE stock in the warehouse.

4.7.4

The company already has a P2K3 organization that functions as an organization that implements and implements OSH in the plantation or factory operational environment. The organization has also been approved by relevant agencies including:

- Decree No. KEP.61 / DISNAKERTRANS / IV / 2019 dated 26 April 2019 concerning the Ratification of PT Binasawit Abadipratama - Bukit Tiga Estate's Work and Safety Committee (P2K3) The P2K3 management structure is Chairperson: Eko Setyo Haryadi, Secretary: Michael Purba who is assisted by the coordinator in the fields of evaluation, supervision, research, counseling and health. Certificate of graduation from participating in the General OHS Expert Training on 11-23 March 2019 for workers a.n Michael Purba. The certificate was issued by PT Sinergy Solusi PJK3, for the certificate and appointment as OHS Expert from the Ministry of Manpower is still in the process of approval in the ministry.
- Decree No. KEP.390 / DISNAKERTRANS / VII / 2017 dated July 13, 2017 concerning the Ratification of the PT Binasawit Abadipratama Occupational Safety & Health Committee (P2K3) – Sungai Rungau Mill. The P2K3 management composition is Chair: Emanuel Harefa, Secretary: Nico Sineri who is assisted by the coordinator in the fields of evaluation, supervision, research, counseling and health. P2K3 Secretary is a General OHS Expert who has been appointed by the Minister in accordance with Minister of Manpower Decree No. KEP.P.4144 / NAKER-BINWASK3 / IX / 2016 dated September 8, 2016 for the appointment of General OHS Expert for a.n Nico Sineri workers as AK3 Sungai Seruyan Estate which is valid for 3 years (08 September 2019).
- Decree No. KEP.68 / DISNAKERTRANS / IV / 2019 dated 30 April 2019 concerning the Ratification of PT Binasawit Abadipratama - P2K3 Working Committee on Occupational Safety and Health. The P2K3 management composition is Chair: Sabam S. Hutabarat, Secretary: Chairul Rasyid Harahap who is assisted by the coordinator in the fields of evaluation, supervision, research, counseling and health. P2K3 Secretary is a General OHS Expert who has been appointed by the Minister in accordance with Minister of Manpower Decree No. KEP.3427 / NAKER-BINWASK3 / VI / 2016 dated June 20, 2016 for the appointment of General OHS Expert for workers a.n Chairul Rasyid Harahap as AK3 Sungai Rungau Mill which is valid for 3 years (June 8, 2019).

The company has conducted routine P2K3 meetings / meetings once a month and has been well documented (minutes, documentation and attendance available). The meetings that have been held include:

- P2K3 Sungai Rungau Mill meeting on May 15, 2019 which was attended by 8 participants and discussed about K3 warnings that have begun to fade and K3 flags that are starting to get dull.
- P2K3 Sungai Rungau Mill Meeting on April 8, 2019 which was attended by 8 participants and discussed the periodic and special health checks and changes in P2K3 structure.
- Sungai Seruyan Estate P2K3 meeting on April 11, 2019 which was attended by 24 participants and discussed checking P3K boxes and use of workers' PPE.

- P2K3 Sungai Seruyan Estate Meeting on March 18, 2019 which was attended by 24 participants and discussed the making of bumps in the four stop each road and evaluation of work accidents.
- P2K3 Bukit Tiga Estate Meeting on 18 April 2019 which was attended by 17 participants and discussed PPE, P3K and work accident evaluation.

4.7.5

SOP Emergency preparedness and response with document number SOP / SMART / GENERAL / SADV / I / 005. Rev 0.0 was passed on July 1, 2014 by the Head of Upstream. This SOP is intended as a guideline in identifying. Preventing potential and overcoming emergencies in estate, factories and other supporting units in the Sinarmas plantation area and its subsidiaries. Flow chart for emergency preparedness as follows Identification of potential emergency conditions → Formation of emergency response team → structure form → Compilation of plans for the supply / replacement of facilities and equipment → Examination of facilities and infrastructure supply plans → Coordinate the specification of facilities and infrastructure of emergency response teams TOP Approval of TOP management → Implementation provision of facilities and infrastructure → Emergency response team equipment monitoring → Equipment readiness statement.

Based on the results of hydrant simulations at Sungai Rungau Mill for emergencies it is known that the emergency response officers who are able to carry out their duties and responsibilities properly and can explain related to firefighting procedures and emergency response owned by the company.

Based on the results of field observations in factories, housing and offices, it is known that the company has warnings related to the evacuation route in each room / location that makes it easy for workers to understand and carry out these instructions when an emergency occurs. These warnings cover gathering areas, evacuation routes, and other things. The company also always provides a safety briefing for each guest / worker who has just entered the company area so that the guest / new worker understands the emergency procedures owned by the company.

The company has first aid kits and bags that have been adapted to the laws and regulations (total of 21 items). First aid boxes and bags are available in each of the plantation and factory units as a K3 facility that supports the application of OSH in the company. The following are the availability and conditions of P3K spread across each unit including:

- Sungai Rungau Mill has 6 first aid kits available in large offices, laboratories, process offices, workshops, hazardous waste temporary storage and waste ponds. The company can also show the results of monitoring the availability and condition of items in the first aid box every month from January to May 2019. From the results of the last monitoring on May 20, 2019 it is known that the condition of the first aid box contents is 21 items with the number of each item in accordance with existing standards.
- Sungai Seruyan Estate has 41 first aid kits for the foremen in the field and 15 first aid kits in the building. The company can also show the results of monitoring the availability and condition of items that are in the first aid box every month from January to May 2019. From the results of the last monitoring on 15 May 2019 it is known that the condition of the contents of the first aid box is 21 items with the number of each item in accordance with existing standards.
- Bukit Tiga Estate has 20 first aid bags for the foremen in the field and 9 first aid kits in the building. The company can also show the results of monitoring the availability and condition of items in the first aid box every month from January to May 2019. From the results of the last monitoring on May 16, 2019 it is known that the condition of the first aid box contents is 21 items with the number of each item in accordance with existing standards.

4.7.6

PT Binasawit Abadipratama has a policy regarding the provision of health and employment insurance to all workers listed in the Collective Labor Agreement 2019-2021 period in article 13 on National Social Security and article 15 on Care and Treatment. These articles explain that companies are required to include all workers in the National Social Security program in accordance with applicable laws and regulations and for health insurance companies must register all workers in the BPJS Health program. The company can show a list of all workers registered as participants of the BPJS Health and Employment and monthly proof of payment is available for each program.

In addition to registering all workers in the "BPJS Ketenagakerjaan" program, the company also ensures that all

contractor workers working are protected and registered in the same program. Proof that can be shown include:

- “BPJS Ketenagakerjaan” Payment for 32 contractor workers (CV Bina Perkasa) for CPO transport contractor in Sungai Rungau Mill for the April 2019 period paid through Bank Rakyat Indonesia (BRI) on April 16, 2019.
- “BPJS Ketenagakerjaan” payments for 19 contractor workers (Koperasi Miftahussalam) for CPO transport contractor in Sungai Rungau Mill for the April 2019 period paid through Bank Rakyat Indonesia (BRI) on April 9, 2019.

Based on the results of interviews with harvest workers, spray workers and plant operators it is known that workers have been registered as BPJS Health and Employment participants. During this time the use of BPJS Health can always be done well for the treatment of workers and their families. If workers want to seek treatment, the company provides facilities in the form of polyclinics and no medical fees.

4.7.7

The company has a record of work accidents using the Lost Time Accident (LTA) matrix as a reference to find out and calculate the total workday loss, severity rate and frequency rate of all accidents that occur in the company. The following is a recording of work accidents that occurred during the past year (May 2018 - April 2019) using the LTA matrix, including:

Unit	Accident Case	Lost Day	Severity Rate	Frequency Rate
Sungai Rungau Mill	0	0	0	0
Sungai Seruyan Estate	8	28	6,35	22,21
Bukit Tiga Estate	46	74	21,94	79,34

Based on the above table it is known that during the period May 2018 - April 2019 there were 54 accidents that occurred with a total loss of working days is 102 days for all units.

Status: Comply

4.8

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

4.8.1 & 4.8.2

PT Binasawit Abadipratama has the data of each employee which is always updated every month in accordance with changes in the addition and reduction of employees every month. The data document explains personal data, marital status, employee status and other information.

PT Binasawit Abadipratama has identified the needs for each worker according to the type of work they have, including:

- The kernel despatch operator is given ISBPR training, emergency response, SCCS and ISCC
- Harvesters are given K3 training, harvesting techniques, first aid kit and PPE usage
- Fertilizers are given K3 training, fertilization techniques, first aid kits and the use of PPE

Based on the identification of training needs, the company has compiled a training program for each worker in the estate and factory in 2019 including:

Factory

- K3 management training
- Dissemination of emergency response, OSH policy, and PPE management
- HIRAC socialization
- RSPO SCCS training
- Firefighting and emergency response team training
- First aid training
- ISCC training
- MSDS socialization
- Environmental management socialization

Estate

- First aid training

- Hyperkes Health Training
- Training on the use of APAR
- Simulation of land and housing fires
- Simulation of chemical spills
- Machine operation training
- Spray training
- Harvest training
- Fertilization training
- IPM staff training
- LSU / SSU training
- MSDS training
- HCV training
- Training on environmental aspects and hazardous waste management

In addition to providing training to its workers, the company also provides training to contractor workers who work in the company's operational areas. the training that has been given, among others:

- OHS Socialization, Code of Ethics, GSEP, SOP & Work Instruction for Contractor on 26 February 2019, which was attended by 9 participants from contractor workers.
- OHS socialization, Code of Ethics, GSEP, SOP & IK Controlling Contractor on 10 May 2019, which was attended by 8 participants from contractor workers.

Based on the training program specified above, the company has shown evidence of the realization of the training that has been carried out by attaching evidence of minutes, attendance and photo documentation of training / outreach activities. Based on field observations and interviews with workers (harvesting, spraying and plant operators) it is known that workers have understood their work in accordance with procedures established by the company and an understanding of the duties and responsibilities for each job has been done quite well

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

Until ASA1.1 there is no new estate development or new mill capacity development. PT BAP has EIA document for the development of plantations and palm oil mills which consist of :

- AMDAL for estate activity covered areas for 17780 ha, approved by National agriculture minister on 1997
- ANDAL for mill activity, covered mill areas about 27.21 ha and mill capacity 80 mt/hour, approved by Head of Bapedalda Kotawaringin Timur regent on 2004
- "Dokumen Evaluasi Lingkungan Hidup" /DELH covered estate area about 2373 ha, approved by Seruyan regent on 2015

Enviromental permit for company name changes and methane capture development based on decree Seruyan regent No 188.45/314/2015 on 2015

5.1.2

PT. BAP has conducted environmental management based on documents of Environmental Management Plan / Environmental Monitoring Plan among others: gas and dust management, noise management by provides PPE, Soil chemical and physic properties, surface water quality testing, ground water quality testing, River flow rate, surface water biota, Public perception, public unrest, and public health. Records of implementation for Environmental Management describes on in RKL-RPL implementation report 2nd semester 2018 and has been reported to environmental agency for regular basis.

5.1.3

Implementation of environmental monitoring was described in RKL-RPL implementation report. Based on the RKL-RPL implementation report of semester 2 of 2018 known there isn't negative impact caused by companies, such as the result of surface water quality, noise, and mill effluent quality testing that conducted periodically has been accordance with the standard qualities set by the government.

Review for environmental monitoring/management plans have been developed and listed on RKL/RPL management review document conducted on January 2019 and these management review indicates that all monitoring parameters are still relevant with existing mill and estates activities.

Status: Comply

5.2

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

5.2.1

PT BAP estates shown HCV assessment for the entire area of operations which done by the RSPO Approved Assessor on 2011. The process of HCV identification conducted by using HCV identification guides in Indonesia on June 2008. These identifications indicates there is HCV 1.1, 1.2, 1.3, 4.1 presence on PT BAP covered areas 1503 ha. All of indicates HCV areas was mapped by 1:50000 scale and this HCV identifications covered all estates/mill operational areas including surrounding landscape and RTE species.

Meanwhile this HCV identifications shown there is some RTE presence on company operational areas such as *tomistoma shcigellii*, asian sun bear, *rangkong pekakak emas*, and *orang utan*.

5.2.2 & 5.2.3

Related to HCV and protected species presence, PT BAP has established HCV management plan 2019 that includes appropriate management and monitoring to maintain HCV attributes and RTE species for examples : species monitoring, HCV areas security including illegal hunting monitoring, HCV socialization, and HCV area revegetation.

Related to RTE species, company had RTE species protections policy listed on SMART policy on 25 June 2015 stated that all workers including contractors are not allowed to hunt, to raise, and killed all RTE species. Evidence for workforce educations related to RTE species are available and verified by auditors team, for examples on February 2019.

To provide protection against such RTE species, management unit has made the hunting ban signboard, patrolling, rehabilitation of riparian as habitat and report to relevant agencies (Nature Conservation Agency). PT BAP also conduct regular inspection for HCV/RTE species protection, last inspection was done on February 2019 indicates there is no wild hunting and no wild animal traps presence on HCV areas.

Based on field visit on SSRE and BTGE workers housing found there is no RTE species reared by workers, interview with harvester on SSRE also found that workers were understood regarding company policy for RTE species protections. Field visit on HCV areas rungu riparian for examples shown that company provides HCV areas information signboards and protected species, signboard for hunting ban and marking conservation areas as species corridors.

5.2.4

Company have established HCV management plan, and implemented it well. Regularly patrols record shown company has been monitored wild species presence, illegal fishing, hunting, and other illegal activities. All of records for monthly patrols on each estate are available and verified by auditors. For example patrols summary results for february 2019 on SSRE and BTGE found " *burung bubut and burung perkutut*", meanwhile wild species trap is not presence.

The result of monitoring also reported to government institution every six month listed on RKL/RPL report. As the results of 2018 monitoring output, company has plan feed back into the management plan 2019 for examples updating protected species signboard reference on each estate with new regulations PermenLH no 20/2018.

Evidence observed :

PT BAP has conducted HCV assessment for entirely operational areas on 2012, this assessment explained there is some HCV attributes presence on SSRE for examples HCV 1.1, 1.2, 1.3, 4.1, and 6 covered areas for 574.46 ha.

Company commitment regarding HCV protections and managements are listed on some procedures and policy as follows : GAR Social and environmental policy on 2015 and HCV management dan monitoring procedures SOP/SMART/BCOS-EHSD/SADV/II/002 on 2014. This procedures also explained company effort regarding HCV areas

protections were by regular patrols and monitoring. Monitoring results for examples periods 2018, found there is no encroachment incident on HCV areas by community.

Field observation on SSRE block O20 found that Rungau riparian (HCV 4) are encroched by community. Document review shown that occupant has "Surat Keterangan Tanah" issued by Rungau Raya head of village with SKT no 140/708/Pem-RR/V/2014 dated May 5 2014 for 20000 m² areas. Auditor teams also have interviewed those occupant (namely Muslimin) dan based on interviewed acquired information that land clearing on HCV areas were conducted by the end of 2015 and suspected there is another occupant on company HCV areas.

Non-Conformance Description :

Implementation regarding HCV monitoring and management are not able to identified the occurrence of occupancy by local community on company appointed HCV areas. Therefore this become **Nonconformance 2019.01 as minor category**

5.2.5

Results of the verification documents, field visits and interviews with villagers obtained information that there is no areas of HCV-related and affect to the local community.

5.2.4 Status: **NCR 2019.01 with minor category**

5.3

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

5.3.1

Major pollutants and all waste products and sources of pollution from mill and estate have been identified and documented in identification and evaluation of pollution source document issued on 2018. Type of waste been identified for examples are :

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

Company has shown environmental aspect of document in the period 2018 for mill and estates listed on document F/SMART/LEMS-EHSD/SADV/001/001 for estate and document F/SRUM/LEMS-EHSD/SADV/001/001 for mill, which also informs about the activities that have an impact on the environment, the environmental aspects, potential impacts, related fields, document control and control management.

5.3.2 & 5.3.3

Inventory for all chemicals usage and ex agrochemical containers are available on chemicals storehouse / temporary hazardous storage. All ex chemicals containers (excluding agrochemicals containers) were kept on temporary hazardous storage at each estate and Sungai Rungau mill.

Based on document review and interview with management representative, shown all ex pesticide containers on estates are managed by 3 times washing in accordance with the MSDS, then stored in the pesticides optimization store and regularly submitted to related vendor i.e PT Semesta Langgeng Sentosa, last shipment conducted on April 2019.

Document review shown that company has sent all toxic and hazardous waste to PT Semesta Langgeng Sentosa (licensed collector) on April 2019 (manifest are available and checked by auditors). Observation during audits at temporary hazardous&toxic waste storage shown that all of hazardous waste are compliant with the periods in permit.

Furhtermore all domestic settlements waste are not disposed using open fire, PT BAP provides landfill for domestic waste management. Field observation on Sungai Rungau mill housing for example, found that companies managed settlements/housing domestic waste by provide landfill and sort the organic/an-organic waste. Observations also found these landfill are located far away from housing and situated on flood free areas.

Status: **Comply**

5.4

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

5.4.1

PT BAP has assess and estimated the direct energy use such as fuel usage by operational activities for 2018-2019 periods. Company shown commitment to reducing fossil fuel by renewable energy usage. Shell and fiber usage have been monitored per month and realization of fossil fuel usage during April 2019 for examples are 25811 litre. During Jan-April 2019, fiber and shell usage for boiler resulting average energy efficiency for diesel fuel are 3.59 litre/mt CPO, for electricity are 100.38 kWh/mt CPO. (Notes : all methane gas produced by methane capture plant are not used as

gas engine fuels, but used as turbine burner on Sungai Rungau Mill)	
	Status: Comply
5.5 Use of fire for waste disposal and for preparing land for replanting is avoided except in specific situations, as identified in the ASEAN guidelines or other regional best practice.	
5.5.1 and 5.5.2 Zero burning policy is presented in document No. SOP/SMART/MCAR/IV/TA-PLB dated 12 June 2012 about land preparation. As informed from Plantation Agency and Environment Agency of Seruyan Regency, as well as information from representative of Rungau Raya and Pantau Village, it was known that there is no burning activities for land clearing and for pest management purposes in PT BAP. Land preparation is conducted mechanically by heavy equipments, meanwhile estate management prefer to control pest population by biological method instead of chemicals. Based on long term management plan for period 2018-2023, it was known that replanting is expected to be carried out as early in 2021/2022 in SSRE and TRWE. However, estate management stated that land clearing will be conducted manually through zero burning method.	
	Status: Comply
5.6 Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.	
5.6.1 & 5.6.2 PT BAP has documents of identification of activities that produce emissions for Mill and Estate, such as: <ul style="list-style-type: none"> • Mill, consists of use of chemicals, the use of fossil fuels, The use of Electricity, Liquid waste. • Estate, consists of, the use of chemical fertilizers, the use of pesticides, the use of Fossil Fuels. In addition, company also identified GHG sources included management plan for reducing it. All waste including emissions and pollutions sources from Mill and estate are identified and recorded on waste and pollution identification risk 2018 document. Fossil fuel reducing have been implemented by fiber and shell usage. Realization of renewable energy have been monitored on monthly report for fiber and shell usage. Waste water has been monitored every months and monitoring periods March 2018 for examples sighted that all of waste water testing parameters is compliant to the standards quality. Meanwhile company also conduct regular air emission and air ambient testing, results of monitoring for semester 2 2018 shown all parameters regarding air quality also comply with relevant standards. Field verification on Sungai Rungai POM also shown that warning signs has been posted on high noise areas, for examples on engine room.	
5.6.3 Calculation of GHG emission and its monitoring has conducted by SADV. GHG emission (Jan-Dec 2018) has calculated through the RSPO PalmGHG Calculator Version 3.0.1, which informed summary of net GHG emission, summary of field emission and sinks, summary of mill emission and credits, POME treatment and POME diverted to anaerobic digestion	
Emmission per product	tCO ₂ e/tProduct
CPO	0.85
PK	0.85
Production	t/yr
FFB processed	434160.77
CPO produced	96547.79
PK produced	25546.80
Extraction	%
OER	22.24
KER	5.88
Lan use	Ha

Planted area	17906.89
Planted on peat	
Conservation (non forested)	1503

Summary of field emission and Sinks

Description	Own crop			Group		
	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e/tFFB	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e/tFFB
Emissions Sources						
Land conversion	124398.81	9.87	0	0	0	0
CO ₂ emissions from fertilizer	58912.98	4.17	0	0	0	0
NO ₂ emissions	15593.34	1.12	0	0	0	0
Fuel consumption	1453.69	0.13	0	0	0	0
Peat oxidation	0	0	0	0	0	0
Sinks			0			
Crop sequestration	-118041.04	-9.36	0	0	0	0
Sequestration in Conservation area	-9035.33	-0.6	0	0	0	0
Total	73272.45	5.33	0	0	0	0

Summary Oil Mill Emissions and Credits

Remarks	tCO ₂ e	tCO ₂ e/t FFB
Emissions sources		
POME	29173.13	0.07
Fuel consumption	799.26	0
Grid electricity	0	0
Credits		
Export of grid electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	29972.39	0.07

Palm Oil Mill Effluent (POME) Treatment

Divert to compost (%)	0
Divert to anaerobic digestion (%)	100

POME Divert to Anaerobic Digestion

Divert to anaerobic pond (%)	18
Divert to methane capture (flaring) (%)	82
Divert to methane capture (electricity generation) (%)	0

Based on document review for examples : pesticides usages monitoring, diesel fuel monitoring, HCV identification and etc found that accurate data has been put into the RSPO palm GHG Calculator. Meanwhile this GHG calculation using options No 1 (apply full version).

Based on document review found there is increasing net GHG emission from 2017 to 2018 (0.5 vs 0.85). based on interview with management found that this matter is caused by reduction of methane gas for turbine during sept-dec

2018, therefore the usage of diesel fuel on Rungau POM are increasing compared to last year.		
	Status: Comply	
PRINCIPLE #6 Responsible consideration of employees and of individuals and communities affected by growers and mills		
6.1		
Aspects of plantation and mill management, including replanting, that have social impacts are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate the continuous improvement.		
6.1.1, 6.1.2, 6.1.5		
<p>PT Binasawit Abadi Pratama has conduct social impact assessment on 2012. The scope of study are impact of plantation and mill operation to workers and community surrounding company areas. These assessment also identified negative and positive impact of plantation and mill operation towards social aspect.</p> <p>Based on document review shown that current SIA and SIA review on 2019 has describing social impact related vulnerable groups (jobless, elderly people, woman), community perception, environment and health, local economy, customary rights and etc.</p> <p>SIA identifications was also done based on affected parties consultation on September 2011, this matter are amplified by stakeholders e.g rungau raya community during stakeholder consultation and besides that based on interview with local community among others Rungau raya and Pantap community shown that major impacts has been identified and managed by company. Based on document review found that major affected parties on surrounding company areas were rungau raya village (SRGE), sebabi vilage (SSRE), rungau raya village (TRWE), rungau raya villages (TNGE), pantap village RT02 (BTGE), and local workers included contractors and local stakeholders.</p>		
6.1.3 & 6.1.4		
<p>Company has established management plan and monitoring plan related for social impact based on the impact identification. This plan has been informed the positive and negative impact including management planning time frame and the person in charge for the activity, such as: potential environment pollution, community perception, and workers facilities. PIC for social management and monitoring are manager in each unit assisted by SPO officer and other related staff. Review for social management and monitoring plan for PT BAP was conducted on February 23 2019. Major impacts that affect communities from company operations during this review among others are perception regarding local workers acceptance, local economy developemnt, CD/CSR, workers status, restlessness about company buffer trench / "parit pringan"</p> <p>Social monitoring plan were implemented by affected parties participatory for examples thorough discussion and interview on february 2019 for Pantap, sebabi, and rungau raya villagers. Documentation of social impact monitoring activities (by interview and discussion) are available for each stakeholders. Interview with representative of Rungau raya and Pantap villagers obtained information that affected parties surrounding company are participated when SIA review was conducted.</p> <p>Based on interview with local community i.e Pantap and Rungau raya found there is no significant impact/issues caused by company because company have effectively implemented social management during 2016-2018.</p> <p>Result monitoring for social impact on surrounding PT BAP affected parties periods 2016-2018 shown the main issues that still presence until now is related community perception regarding company CD/CSR programme and community restlessness for buffer trench, regarding this as monitoring output PT BAP has enhanced and regular develop new social management plan 2019 that included installation of warning sign board on buffer trench, provides trash bin on pantap villages, and enhanced socialization regarding job vacancy to related local stakheolders.</p>		
	Status: Comply	
6.2		
There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.		
6.2.1 and 6.2.3		
<p>The CH has list of stakeholders has updated annually by SPO Region Kalimantan tengah 2 and approved by Regional Controller. As latest update on 25 January 2019, list of stakeholders is consist of 2 Head of Sub-Regency from Seruyan Raya and Danau Seluluk; 5 Head of Village from Asam baru, Rungau Raya, Sebabi, Selunuk and Pantap Village; 6</p>		

Head Master of education institutions (schools); 3 Elders from Village of Rungau Raya, Asam Baru and Sebab; 5 Head of Labour Union from all Estates; 5 Head of Gender Committee from all Estates; 22 Local Contractors; 5 PIC from surrounding companies.; 7 PIC from government institutions (BPJS Manpower, BPJS Health, Environment Agency, Manpower Agency, Plantation Agency, Manpower Agency of Seruyan Regency and Kalimantan Tengah Province, and Police Sector Office; 2 representative of Hospital (Murjani and Hanau); and 2 NGO's (Orang Utan Foundation International and Lingkar Komunitas Sawit).

Procedure of communication and consultation for external and internal stakeholders mechanism is presented in document No. SOP/SMART/UMUM/SADV/II/004 (Rev 00) dated 01 July 2014. For internal stakeholders information request is starts by filling information Form and should be approved by SPO Officer. Meanwhile for external stakeholders, information could be through directly filling the Form of Communication, email and letter. Information which has no listed on public document, is approved when permitted by top management. SPO Officer was person in charge (PIC) to deliver information request to the respective Department, for approval from the respective PIC. Time of information response shall be less than 1 week and plan for response arrangement should be less than 3 weeks. Receipt of information delivery is made as evidence of response. Furthermore, procedure of information request is presented in doc. No. SOP/SMART/UMUM/SADV/II/004 (Rev 00) dated 01 July 2014 about mechanism of communication and consultation for external and internal stakeholders. Socialization of procedure had been conducted to all Village on 12 April 2016 by SPO Officer. This is confirmed during interview with representatives from Village of Rungau Jaya and Pantap. Information request and response is recorded on logbook Form No. F/SMART/UMUM/SADV/004/002 which informed date of Letter In (information request letter) and date Letter Out (company response letter). According to logbook review, it was known that there is no information request in 2018 and 2019 for SSRE and BTGE.

6.2.2

PIC for information request, especially on social matters is conducted by the respective Estate Manager as presented through Decree of Regional Controller (RC) and Production Controller (PC) Kalimantan Tengah 2 Region No. 03/RC-KALTENG-2/01/2017 dated 04 January 2017. Job description of PIC are to communicate surrounding communities aspiration to the top management if necessary, as a company representative and to ensure that the process is accordance with procedure. Coordination with other Division might be needed. Based on interview with representative from Pungau raya and Pantap Village, it was known that company PIS was familiar with village societies. Communication so far is considered satisfactory.

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

The company has the SOP Handling Complaints and Dis-satisfaction no. SOP/SMART/SIGS-CSRD/SADV/II/003 that explain the process of delivering and handling complaints and grievances internally and externally. In the SOP also mentioned that the company guarantees the anonymity of the reporting and the revealer of the case (whistleblower). Head of Administration is responsible for hearing and record all complaints and grievances that exist both orally and in writing from the external. Responses to the complaint and dissatisfaction is given as soon as possible and no later than one month after the issue received. SOP Handling Complaints and Dissatisfaction only up to the enterprise level. Based on interviews with management, if there is no solution in the complaint mechanism, can be brought to the RSPO Complaint System.

6.3.2

The whole recording and handling of related complaints recorded in the Monitoring Form Handling Complaints and dissatisfaction document number: F/SMART/SIGSCSRD/SADV/003/001. During the audit and public consultation, there is no complaint or dis-satisfaction from the stakeholder contacted (government agencies, village representatives or worker union).

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

The procedure of "SOP Ganti Rugi Tanah/Lahan (SOP/NP/SMART/VII/D&L002, dated 1 Juli 2010)" described the mechanism for identifying legal, customary or user rights and also for identifying people entitled to compensation and determining calculation method to provide fair compensation. Evidence of Procedure Awareness was documented. It was communicated to related parties such as community leaders, and religious figures and youth leaders.

While, within the FPIC Procedure No. SOP/SMART/SENS-CSR/SADV/II/003, part 2.4 describes that identification of participatory map related to legal ownership of communities are considering gender, community leader, local or transmigrant communities, ethnic groups or communal land ownership, etc.

6.4.2

The procedure of "SOP Ganti Rugi Tanah/Lahan (SOP/NP/SMART/VII/D&L002, dated 1 Juli 2010)" described the mechanism for identifying legal, customary or user rights and also for identifying people entitled to compensation and determining calculation method to provide fair compensation. Evidence of Procedure Awareness was documented. It was communicated to related parties such as community leaders, and religious figures and youth leaders.

While, within the FPIC Procedure No. SOP/SMART/SENS-CSR/SADV/II/003, part 2.4 describes that identification of participatory map related to legal ownership of communities are considering gender, community leader, local or transmigrant communities, ethnic groups or communal land ownership, etc.

6.4.3

All the documents of land compensation is kept by legal department and if there is any inquiry from affected parties or relevant parties, the document can be accessed through officer/management permission.

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

The company has a Collective Labor Agreement document for the period 2019-2021 between PT Binasawit Abadipratama and the PT Binasawit Abadipratama Federation of Independent Trade Unions which was ratified based on the Decree of the Head of the Seruyan Regency Manpower & Transmigration Office. 560/42 / DISNAKERTRANS / II / 2019 dated February 4, 2019. In the Collective Labor Agreement it recycles and explains related to the scope of the PKB, the right to associate & organize, recruitment of workers, positions & groups, working hours, wages, overtime, training & development, work performance assessment, national social security, holiday allowances, annual leave, K3, employee cooperatives and others. To ensure the understanding of all workers related to the CLA, the company has conducted a socialization of its understanding in each unit including:

- Collective Labor Agreement socialization at the Rungau Mill River on May 10, 2019 which was attended by 8 participants
- Collective Labor Agreement socialization at the Rungau Mill River on April 16, 2019 which was attended by 20 participants
- Collective Labor Agreement socialization at Sungai Seruyan Estate on May 9-10, 2019 which was attended by 434 participants
- Collective Labor Agreement socialization at Bukit Tiga Estate on May 2, 2019 which was attended by 18 participants
- Collective Labor Agreement socialization at Bukit Tiga Estate on 09-10 May 2019 which was attended by 251 participants

PT Binasawit Abadipratama has supporting documents to ensure the standard payroll system in the company runs well and complies with applicable laws and regulations. The wage documents include:

- Central Kalimantan Governor Decree No. 51 of 2018 on November 21, 2018 concerning Regency / City Minimum Wages and Regency / City Sectoral Minimum Wages in Central Kalimantan Province in 2019. The determination of agricultural sectoral minimum wages in Seruyan Regency in 2019 was Rp. 2,930,000, - and took effect on January 1, 2019.
- Decree of the Director of PT Binasawit Abadipratama No. 001/005 / CEO Kaltengsel / 01/2019 dated January 25, 2019 concerning Structure and Wage Scale of Permanent Workers in 2019 which came into force on January 1, 2019. From this document it is known that the lowest wage at present is for workers with a PT4 T1 group of Rp. 2,930,500, - and the highest is for PT1 A5 workers amounting to Rp. 3,349,202.
- Circular Letter No. Div.Agro.PSM6-6A / SE / 007-001 / III / 2017-Revision 1 / additional 4 dated 17 May 2017 concerning Non-Harvest Premium Provisions which explains about the amount of premiums obtained for non-harvest work such as pruning, spraying, and fertilizing and other jobs.
- Circular no. VPA-KTS / SE / PP / 2019/02 / Seruyan-Manual dated May 17, 2019 concerning the Manual Palm Oil Palm FFB Manual Harvesting System. The letter explains about the harvest classes and sub classes which form part of the calculation of harvest premiums for workers. In addition to regulating harvest premiums, it also regulates harvesting premiums and FFB transport.

Non-Conformity No. 2019.02

Observed Evidence

Based on the results of a review of the list of workers' documents, it is known that the company has 80 workers in the Seruyan Estate and 101 workers in Bukit Tiga Estate. Workers with PKWT (Contract Worker) status who work as harvesters are 20 workers in Sungai Seruyan Estate and 22 workers in Bukit Tiga Estate. Harvesting work is work that is permanent in the operations of the plantation and may not be carried out by workers with PKWT (contract worker) status.

Non-Conformance Description

The company has not been able to prove that the labor recruitment system is in accordance with Minister of Manpower Decree No. 100 of 2004 concerning Provisions for the Implementation of Specific Time Work Agreements and Law No. 13 of 2003 concerning Manpower.

6.5.3

PT Binasawit Abadipratama has welfare facilities for all workers available in each unit of the estate and factory, facilities provided by the company are G1 houses, G2 houses, polyclinics, mosques, prayer rooms, churches, kindergartens, elementary schools, school buses, water reservoirs, fields soccer, volleyball court, badminton court, food stalls, fuel kiosks, employee cooperatives, and other facilities.

Based on the results of field visits at the Bukit Tiga Estate Division 2 worker housing, Division 2 Sungai Seruyan Estate and Sungai Rungau Mill housing it is known that all facilities (houses and neighborhoods) are in good condition and maintained, each house is inhabited by 1 family and none is inhabited by more than 1 family.

The company also provides electricity from the Rungau Mill River for the needs of employees with specified service hours, including:

- Morning: 04.00 - 06. 00. (normal day for 7 hours)
- Evening: 17:00 - 22:00
- Holidays: 08:00 - 11:00 (Sunday hours / day).

In addition to the availability of electricity, the company provides self-help water services for the needs of employees with specified service hours including:

- Morning: 04.00 - 05.00.
- Evening: 17:00 - 18:00.

Based on interviews with housing residents, it is known that the company has provided welfare facilities for free and can be accessed by workers and their families. The provision of electricity and water has been deemed sufficient and adequate. The company also provides stalls for businesses selling basic food necessities to workers so that access to

daily needs can be easily obtained.

Based on the results of field visits it is known that the company has provided adequate welfare facilities for workers such as housing, availability of clean water, availability of electricity, the availability of health facilities in the form of clinics in each unit and guarded by doctors and paramedics (nurses and midwives), worship facilities for workers. In addition the company also provides educational facilities in the form of kindergarten within the company environment and the provision of school buses for the transportation of children of workers. All of these facilities can be easily accessed by all workers and their families.

6.5.4

The company has made it easier for workers and their families to obtain food sources by providing employee cooperatives that sell the daily needs of workers and provide access to vegetable traders to sell in the area of workers' housing. In addition there are also workers who open small business stalls to sell daily necessities in each housing.

Based on interviews with workers, unions and gender committees, it is known that workers have no difficulty in getting food sources because the company has provided cooperatives that sell daily necessities and there are vegetable vendors who are given access to sell at home. In addition, workers can buy these needs into markets around the area of the company with access that is not too difficult.

	Status: Comply	
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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

PT Binasawit Abadipratama already has a Circular from the Vice President of Agronomy No. 020 / HR PSM6 / 01/11 dated January 3, 2011 concerning Freedom of Association. In the letter stated that the company provides freedom for employees to associate and gather written in Indonesian. In addition, the company has a Collective Labor Agreement for the period of 2019-2021 article 3 on the Recognition of the Right to Organize & Organize stating that the company recognizes and gives freedom of rights to workers to form and establish labor unions.

A labor union has been formed at the company formed by the workers and supported by the company. At present there are unions that have been registered and organized in each company unit. Based on interviews with union officials at Sungai Rungau Mill, Sungai Seruyan Estate and Bukit Tiga Estate it was found that the company gave all employees the freedom to join or not join the union. The company also always gives room for union officials and members to discuss to discuss labor issues in the company.

	Status: Comply	
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6.7

Children are not employed or exploited.

6.7.1

PT Binasawit Abadipratama already has a GAR Social and Environmental Policy (KSLG) to implement policies related to hiring in accordance with applicable regulations and has been signed by the Head of Upstream, CEO-Downstream & Commercial, Executive Director & CFO; The Managing Director of Sustainability & Strategic Stakeholder Engagement, in point 3 of the Work Environment and Industrial Relations states that companies forbid employing children and take actions to prevent the use of child labor in our activities. Take corrective action if child labor is found and ensure appropriate follow-up and provide safety protection assistance. In addition the company has made Circular from HR Director No. 002 / SE-HRDV / 03/09 dated 31 March 2009 concerning the Minimum Age Limit which states that companies set a minimum age limit of 18 years based on Law No. 13 of 2003.

Based on the verification of the Workers Register document at Rungau Mill River, Sungai Seruyan Estate and Bukit Tiga Estate, there were no workers who were under 18 years of age at initial admission. The results of interviews during field visits and interviews with harvest workers, sprayers, and factory operators revealed that there were no workers under

the age of 18 and during the past year there were no incidents of sexual harassment in the company's work environment.		
	Status: Comply	
6.8 Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.		
6.8.1; 6.8.2 & 6.8.3 PT Binasawit Abadipratama already has a GAR Social and Environmental Policy (KLSG) to implement policies related to hiring in accordance with applicable regulations and was signed by the Head of Upstream, CEO-Downstream & Commercial, Executive Director & CFO; The Managing Director of Sustainability & Strategic Stakeholder Engagement, in point 3 Work Environment and Industrial Relations states that the company provides equal opportunities for all workers, and embraces diversity regardless of ethnicity, religion, disability, gender, political affiliation, sexual orientation, or membership labor union. The company ensures that workers are protected from acts of discrimination in all stages of employment relations. To ensure the implementation of the auditor's review of the employee registration document, it is known that the workers recruited have diverse educational, ethnic and religious backgrounds. Also based on field observations it is known that workers come from a variety of ethnicities, religions, races, and genders. Based on interviews with workers, trade unions and gender committees, it is known that the recruitment of workers is based on the needs of the company regardless of ethnicity, religion, race and class background. All prospective employees are entitled to the opportunity to work according to their scientific background and company needs. In addition, during 2018-2019 there were no issues regarding discrimination against workers.		
	Status: Comply	
6.9 There is no harassment or abuse in the work place, and reproductive rights are protected.		
6.9.1 & 6.9.2 PT Binasawit Abadipratama already has a GAR Social and Environmental Policy (KSLG) to implement policies related to hiring in accordance with applicable regulations and has been signed by the Head of Upstream, CEO-Downstream & Commercial, Executive Director & CFO; The Managing Director of Sustainability & Strategic Stakeholder Engagement, in point 3 of the Work Environment and Industrial Relations states that companies forbid employing children and take actions to prevent the use of child labor in our activities. Take corrective action if child labor is found and ensure appropriate follow-up and provide safety protection assistance. In addition the company has made Circular from HR Director No. 002 / SE-HRDV / 03/09 dated 31 March 2009 concerning the Minimum Age Limit which states that companies set a minimum age limit of 18 years based on Law No. 13 of 2003. For policies to maintain decency in the work environment, the company has Circular No. 118 / HR.PSM06 / 08/2011 dated August 1, 2011 regarding the Prohibition of Sexual Harassment Policy which states that the company will provide sanctions to workers who carry out such treatment with disciplinary punishment until termination of employment (FLE). The company has a work program for gender committees in 2019 with activities such as posyandu activities, religious studies, regular meetings of the management every semester, conducting gender socialization, hygiene socialization and environmental management. Based on the results of interviews with women workers in spray and fertilizer activities it is known that the workers already know the management of the gender committee and have received socialization related to women's rights (gender). In addition, during the past year there had never been any sexual harassment / violence that occurred in the operational area. Based on the results of interviews with the management of the gender committee it is known that policies related to gender and women's rights set by the company become a reference for the managers to carry out activities and socialization to workers. During the past year there have never been any incidents or issues related to sexual harassment, domestic violence, child labor or human rights violations.		

		Status: Comply	
6.10			
Growers and mills deal fairly and transparently with smallholders and other local businesses.			
6.10.1 & 6.10.2			
Sei Rungau Mill (PT. Binasawit Abadipratama) does not have a partnership agreement with smallholders. In addition, Sei Rungau Mill also did not receive FFB from independent outgrower. Thus, there is no mechanism and publication regarding the price of FFB available in the estate or mill.			
6.10.3			
Sei Rungau Mill (PT. Binasawit Abadipratama) does not have a partnership agreement with smallholders. In addition, Sei Rungau Mill also did not receive FFB from independent outgrower. Thus, there is no mechanism and publication regarding the price of FFB available in the estate or mill.			
However, CH has had an agreement with local contractor in order to increasing local income and job opportunities. For example, there is a contract of FFB transporter and EFB application that involved local peoples.			
6.10.4			
Sei Rungau Mill (PT. Binasawit Abadipratama) does not have a partnership agreement with smallholders. In addition, Sei Rungau Mill also did not receive FFB from independent outgrower. Thus, there is no mechanism and publication regarding the price of FFB available in the estate or mill.			
However, CH has had an agreement with local contractor in order to increasing local income and job opportunities. For example, there is a contract of FFB transporter (Umiyanto and Ponijo) involved local peoples (Rungau Raya Village).			
		Status: Comply	
6.11			
Growers and millers contribute to local sustainable development wherever appropriate.			
6.11.1			
Stakeholders consultation are conducted on April 2018 to identify the needs and priorities of local communities development. PT Binasawit Abadi Pratama has contributed to local development throughout Corporate social responsible program. The contribution done by company as follows : public religious events, public healthcare, donation, local contractor utilization, and road maintenance .			
Generally PT BAP shown local communities development by local contractor engagement, taxes payment for central/local government, local workers recruitment, and annual CSR programme by each estates. Interview with representative of Rungau Raya and Pantap villages obtained information that affected parties surrounding company are participated and involved based on consultation with local communities when company determined CD/CSR priorities.			
6.11.2			
PT BAP do not have any independent or associates scheme smallholders that supplying FFB to Sungai Rungau mill.			
		Status: Comply	
6.12			
No forms of forced or trafficked labour are used.			
6.12.1; 6.12.2 & 6.12.3			
The company has a commitment to the prohibition of force labor and trafficking, one of which is the issuance of GAR's Social and Environmental Policy, in point 3.1 regarding recognizing, respecting and strengthening workers' rights, it is stated that the company prohibits forced or labored labor (IJON) and takes steps to prevent this, provide employment contracts for all employees in an easily understood language.			
Based on the results of the study of work contract documents and a list of workers, it is known that there are no foreign workers who work at the level of implementing workers up to the manager's position. Foreign workers only exist at the top management level. In addition, there are no workers from trade or illegal workers or contract substitution because all			

workers have a working relationship with the company. This is in line with the results of interviews with harvest, fertilizer, spray and factory operator workers who stated that so far no use of forced labor, child labor, or family members who helped employees. All workers have work ties with the company.

Status: Comply

6.13

Growers and millers respect human rights

6.13.1

The policy to respect human rights is contained in the Social and Community Engagement Policy published on November 10, 2011 point 6, namely Respect for Human Rights (HAM).

On September 8, 2015, the management of Golden Agri Resources (GAR) released the GAR Social and Environmental Policy. In clause 2.2.3 in the document, a statement regarding respect for human rights reads "we are committed to upholding and promoting a general statement on UN human rights for all workers, contractors, indigenous peoples and local communities in all company operations".

Based on the results of interviews with trade unions and gender committees, it is known that so far there have never been cases of human rights violations committed by companies. This is also the same as the results of interviews with the surrounding villages, namely that there have never been cases of human rights violations committed by the company to the surrounding community.

Status: Comply

PRINCIPLE #7 Responsible development of new plantings

7.1

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

7.1.1, 7.1.2, 7.1.3

Based on documents review, interview and field visits at CH, it is known that CH did not expand the operational area and there is no more land clearing activity since the last assessment Re-cert. Therefore SIA and EIA document are covered on current document see indicator 5.1 and 6.1

Status: Comply

7.2

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

7.2.1 and 7.2.2

As mentioned in the previous audit assessment, it was known that there is no new planting after 01 November 2005. However there were planting of supply palms where carried out in TRWE for about 12.38 ha and in TNGE for about 46.21 ha, in 2006 and 2007, respectively. Furthermore, for palms planted in 2005, such as 71.03 ha in SRGE, 178.61 ha in TNGE and 796.80 ha in BTGE, the lands were cleared in between October to September 2004. Up to audit surveillance 1.1, there is no additional estate operational areas. Thus, this Indicator is not applicable.

Status: Comply

7.3

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

7.3.1, 7.3.2, 7.3.3, 7.3.4, 7.3.5

Certificate holder do not conduct any new development since November 2005. PT Binasawit Abadi Pratama are subsidiaries of Golden Agri Resources and has been submit Disclosure of Liability to RSPO on 29 August 2014 with Zero Liability. Based communication between CB and RSPO by email on June 21 2017 its confirmed that PT BAP has zero liability status. Current HCV identification and management plan are able to seen on indicator 5.2

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	As mentioned in the previous audit assessment, it was known that there is no new planting after 01 November 2005. However there were planting of supply palms where carried out in TRWE for about 12.38 ha and in TNGE for about 46.21 ha, in 2006 and 2007, respectively. Furthermore, for palms planted in 2005, such as 71.03 ha in SRGE, 178.61 ha in TNGE and 796.80 ha in BTGE, the lands were cleared in between October to September 2004. Up to audit surveillance 1.1, there is no additional estate operational areas. Thus, this Indicator is not applicable.	
	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	There is no new land clearing or land expansion activities after 1 November 2005. Planting year 2005 in Tangar Estate (441 Ha) was land cleared on 2004. While planting year 2006 and 2007 is only supplying due to diseases or unproductive trees issues.	
	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	There is no new land clearing or land expansion activities after 1 November 2005. Planting year 2005 in Tangar Estate (441 Ha) was land cleared on 2004. While planting year 2006 and 2007 is only supplying due to diseases or unproductive trees issues.	
	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 and 7.7.2	As mentioned in the previous audit assessment, it was known that there is no new planting after 01 November 2005. However there were planting of supply palms where carried out in TRWE for about 12.38 ha and in TNGE for about 46.21 ha, in 2006 and 2007, respectively. Furthermore, for palms planted in 2005, such as 71.03 ha in SRGE, 178.61 ha in TNGE and 796.80 ha in BTGE, the lands were cleared in between October to September 2004. Up to audit surveillance 1.1, there is no additional estate operational areas. Thus, this Indicator is not applicable.	
	Status: Comply	
7.8	New plantation developments are designed to minimise net greenhouse gas emissions.	
7.8.1 & 7.8.2	Certificate holder do not conduct any planting or new development since January 2015. Current GHG calculation for existing operational areas are able to seen on indicator 5.6.3.	
	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.	
Internal Audit	RSPO internal audit for P&C and supply chain has been conducted by five internal auditor from Sustainability Policy and	

Compliance Division on 25 March to 01 April 2019, and reported on 12 April 2019. According to the report it was known that there were 13 non conformity identified related to P&C and zero findings for supply chain. All findings has been closed on 06 May 2019.

BMP

Starting from January 2019, estate management has adopting digitation recording on FFB delivery from estate to mill through electronic – Field Activity Capture and Traceability (e-FACT) system, which replace manual recording method by FFB Delivery Letter (SPB).

Enviromental aspect

Rungau mill has develop methane capture plant. The methane gas produced by this plant are not utilized as gas engine fuel but utilized as turbine burner. Therefore diesel fuel and fiber and shell usage can be reduced to minimize GHG.

Certification awarded:

1. Indonesian Sustainable Palm Oil (ISPO) certificate from ISPO Commission (certificate number MUTU-ISPO/063) since 19 July 2016.
2. International Sustainability and Carbon Certification (ISCC) from Intertek (certificate number EU-ISCC-CRT-ID218-20180105) period 20 October 2018 until 19 October 2019.
3. Environmental certificate (PROPER BIRU period 2017 – 2018) from Environmental and Forestry Ministry Republic of Indonesia for Sungai Rungau Palm Oil Mill.

	Status: Comply	
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3.2 Summary of Assessment Report of Supply Chain Requirements

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 has had a physical handling agreement with third parties for CPO transport from mill to bulking. Based on document verification, there is only one transporter listed as CPO transporter on behalf CV Permata Seruyan, CV. Bina Perkasa and Koperasi Miftahussalam. There is a valid contract until 31 March 2019).</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>PT Binasawit Abadipratama - Mill is not a trader / distributor. PT Binasawit Abadipratama - Mill do not buys RSPO products from another licensed traders.</p> <p>Sungai Rungau Palm Oil Mill sell their certified product to the certified bulking and kernel crushing plant (KCP) as follows:</p> <ul style="list-style-type: none"> • Bumi Harjo Bulking/PT. Tapian Nadenggan (Certificate No. SQUAL40065 issued by PT. SAI Global Indonesia licensed period from 23 September 2014 until 22 September 2019) • Perdana KCP/PT. Binasawit Abadipratama (Certificate No. SQUAL40120 issued by PT. SAI Global Indonesia licensed period from 12 November 2015 until 11 November 2020) • Hanau KCP/PT. Tapian Nadenggan (Certificate No. SQUAL40064 issued by PT. SAI Global Indonesia licensed period from 23 September 2014 until 22 September 2019)
	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>PT. Binasawit Abadi Pratama - Sungai Rungau Palm Oil Mill, subsidiary of Golden Agri Resources Ltd has registered in RSPO membership 1-0096-11-000-00 since 31 March 2004.</p> <p>Sungai Rungau Palm Oil Mill has been registered in IT platform palm trace RSPO https://palmtrace.rspo.org/web/rspo/member-directory which information as follows:</p> <ul style="list-style-type: none"> • Member Name: PT. Binasawit Abadi Pratama - Sungai Rungau Palm Oil Mill • Account UID: RSPO_AC1000001184 • Core Product: Palm Oil • Member ID: RSPO_PO1000001155 • Type of Business: Oil Mill
	Status: Comply
5.1.4	<p>Processing aids do not need to be included within an organization's scope of certification.</p> <p>There is no processing aids in PT Binasawit Abadipratama - mill</p>

	Status: Comply
5.2	Supply chain model
5.2.1	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.
	Facility still received FFB from uncertified area. The consequently is using module E – Mass Balance.
	Status: Comply
5.2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.
	Until this surveillance audit, facility using mass balance module only.
	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.
	<p><i>There is no change of the IP procedure.</i></p> <p>SOP on RSPO SCCS Model Identity Preserved (PT BAP-SRUM/SOP/28) dated 1 June 2015 composed by document controller, checked by Mill Manager and approved by Production Controller. The procedure covers RSPO SCCS referred to RSPO SCCS 21 November 2014 and RSPO SCC Standard Module D CPO Mills: Identity Preserved, 21 November 2014 and SOP of Palm Oil Mill Processing, PT SMART 2013.</p> <p>The personnel involved are mentioned in part 3 of the procedure who are security, weighbridge clerk, Mill/Estate/KCP Assistants, Administration Head, Production Controller and Support Department.</p> <p>During the field visit, the traceability personnel, Head of Administration, Security and weighbridge officer can explain the received certified FFB according to the scope of SCCS model.</p>
	Status: Comply
5.3.2	The site shall have a written procedure to conduct annual internal audit
	Facility has had procedure for internal audit in SOP Internal Audit (SPO/SMART/UMUM/SADV/I/009). According to the document, facility will conducted internal audit annually. The last internal audit of supply chain conducted on 25 March – 2 April 2019. There was no nonconformity record identified during the audit. However, facility has conducted management review on 6 May 2019.
	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
	<p>Facility has had a potential buyer list of their palm product as follows:</p> <ul style="list-style-type: none"> • Bumi Harjo Bulking/PT. Tapan Nadenggan (Certificate No. SQUAL40065 issued by PT. SAI Global Indonesia licensed period from 23 September 2014 until 22 September 2019) • Perdana KCP/PT. Binasawit Abadipratama (Certificate No. SQUAL40120 issued by PT. SAI Global Indonesia licensed period from 12 November 2015 until 11 November 2020) • Hanau KCP/PT. Tapan Nadenggan (Certificate No. SQUAL40064 issued by PT. SAI Global Indonesia licensed period from 23 September 2014 until 22 September 2019) <p>Those list also completed with buyer address, contact person and position, phone number etc. Based on data above known that all potential buyer has certified RSPO supply chain.</p>

During the audit, auditor has verify shipping announcement of Sungai Rungau POM in RSPO IT platform. Sungai Rungau POM has license ID (CB72549) for their transaction. There is a record of transaction record during September 2018 that has been listed.

Status: Comply

5.4.2

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

Mechanism of handling of RSPO certified and non-certified products is presented in document SOP on RSPO SCCS Model Identity Preserved (PT BAP-SRUM/SOP/28) dated 1 June 2015 composed by document controller, checked by Mill Manager and approved by Production Controller. The procedure covers RSPO SCCS referred to RSPO SCCS 21 November 2014 and RSPO SCC Standard Module D CPO Mills: Identity Preserved, 21 November 2014 and SOP of Palm Oil Mill Processing, PT SMART 2013. procedure has covers identification and traceability of RSPO certified and non-certified products, as well as responsible person in charge.

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.

According to the document verification and interview with mill manager/staff informed that all CPO product transferred to Bumi Harjo Bulking (PT. Tapan Nadenggan) where a mill rent the storage/bulking (Certified RSPO Supply Chain). Mill also had some contract with the CPO transporter as follows:

- Contract No. 001/BAP/SRUM/03/2018-CPO dated 1 April 2019 with CV. Bina Perkasa.
- Contract No. 002/BAP/SRUM/03/2018-CPO dated 1 April 2019 with CV. Permata Seruyan
- Contract No. 001/BAP/SRUM/01/2018-CPO dated 2 January 2019 with Koperasi Miftahussalam

Mill also had a contract with PT Satrindo Jaya Agro Palma (palm kernel transporter) Contract No. 001/BAP/SRUM/10/2014-PK dated 24 Februari 2018 to transferred palm kernel product from mill to Perdana KCP - PT. Binasawit Abadipratama (certified RSPO supply chain).

All third party transporter has agreed to provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance.

Status: Comply

5.5.2

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

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

Facility delivered their palm product to:

- Bumi Harjo Bulking/PT. Tapan Nadenggan (Certificate No. SQUAL40065 issued by PT. SAI Global Indonesia licensed period from 23 September 2014 until 22 September 2019)
- Perdana KCP/PT. Binasawit Abadipratama (Certificate No. SQUAL40120 issued by PT. SAI Global Indonesia licensed period from 12 November 2015 until 11 November 2020)

<ul style="list-style-type: none"> Hanau KCP/PT. Tapian Nadenggan (Certificate No. SQUAL40064 issued by PT. SAI Global Indonesia licensed period from 23 September 2014 until 22 September 2019) 	
	Status: Comply
5.5.3 The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	
The names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products are in places. There are 4 CPO/PK transporter and 3 bulking/KCP.	
	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	
During the audit, there is no new outsourcers. Based on interview with mill's staff informed that if any new outsourcers, facility will inform MUTU during the audit.	
	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	
Facility has had a potential buyer list of their palm product as follows: <ul style="list-style-type: none"> Bumi Harjo Bulking/PT. Tapian Nadenggan (Certificate No. SQUAL40065 issued by PT. SAI Global Indonesia licensed period from 23 September 2014 until 22 September 2019) Perdana KCP/PT. Binasawit Abadipratama (Certificate No. SQUAL40120 issued by PT. SAI Global Indonesia licensed period from 12 November 2015 until 11 November 2020) Hanau KCP/PT. Tapian Nadenggan (Certificate No. SQUAL40064 issued by PT. SAI Global Indonesia licensed period from 23 September 2014 until 22 September 2019) 	
	Status: Comply
5.7	Registration of transactions
5.7.1 Supply chain actors who: <ul style="list-style-type: none"> are mills, traders, crushers and refineries; and take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable 	
Facility has shown their transaction document that consist registration in IT platform. It also can be downloaded at RSPO palm trace. During the audit, auditor has verified the sales information in RSPO Palm Trace that informed some transaction of certified product as RSPO, other schemes and conventional.	
	Status: Comply
5.7.2 The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform: <ul style="list-style-type: none"> Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures. Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually. 	

<ul style="list-style-type: none">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.			
According to the verification of transaction record in RSPO IT Platform compare with book keeping record in mill, found that facility has recorded all of their transaction in RSPO IT Platform. Based on that indicated of some types of selling product such as RSPO certified, other scheme and conventional.			
	Status: Comply		
5.8	Training		
5.8.1			
The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff			
Facility has conducted integrated training (GAR Social and Environment Policy, OHS and RSPO Supply Chain) on 7 May 2019 in SRUM meeting room. This training attended by 17 person that related to supply chain implementation task. During the audit, auditor has interviewed 2 security officer in security gate (FFB receiving station) and 4 weighbridge operator. Based on interview informed that they well-known regarding on supply chain procedure and implementation and also other sustainability policy.			
	Status: Comply		
5.8.2			
Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed			
Facility has conducted integrated training (GAR Social and Environment Policy, OHS and RSPO Supply Chain) on 7 May 2019 in SRUM meeting room. This training attended by 17 person that related to supply chain implementation task. During the audit, auditor has interviewed 2 security officer in security gate (FFB receiving station) and 4 weighbridge operator. Based on interview informed that they well-known regarding on supply chain procedure and implementation and also other sustainability policy.			
	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			
Facility has shown the book keeping report in detail that explain the number of FFB certified or noncertified received, amount of CPO/PK certified or noncertified produced and dispatch. All records are accurate, complete, up-to-date and accessible.			
	Status: Comply		
5.9.2			
Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock			
CH has showed document of delivery note and weighbridge ticket from 7 May 2014.			
	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 initial assessment certificate and monitored in three-monthly bases. If any overproduction, facility will inform the CB to extend their volume.			
Product	Estimation of	Actual Production 12 Month	Projected production of

	Certified Product (MT)	before audit (May 2018 – April 2019) (MT)	the next license period (MT)
FFB	463,173	452,228	494,841
CPO	101,898	95,937	111,339
PK	25,474	25,060	27,216

Source: production data 12 month before audit (May 2018 – April 2019)

	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 only performs FFB processing to produce CPO and PK. Based on SOP of IP, it is explained that the conversion factors of CPO and PK were based on actual extraction.
	Status: Comply
5.10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.
	Facility only performs FFB processing to produce CPO and PK. Based on SOP of IP, it is explained that the conversion factors of CPO and PK were based on actual extraction.
	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.
	During this certification period, facility does not have any certified CPO/PK transaction. They also does not using RSPO's logo at any communication or in product.
	Status: Comply
5.12	Complaints
5.12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.
	Procedures for stakeholder complaint presented in SOP complaint and grievance handling (SOP/SMART/SIGS-CSRD/SADV/II/003). However, based on complaint logbook review, there is no complaint related to IP supply chain system implementation.
	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
	Facility has had procedure for internal audit in SOP Internal Audit (SPO/SMART/UMUM/SADV/II/009). According to the document, facility will conducted internal audit annually. The last internal audit of supply chain conducted on 25 March – 2 April 2019. There was no nonconformity record identified during the audit. However, facility has conducted management

review on 6 May 2019.	
	Status: Comply
5.13.2 The input to management review shall include information on: <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard. • Customer feedback. • Status of preventive and corrective actions. • Follow-up actions from management reviews. • Changes that could affect the management system. • Recommendations for improvement. 	
Facility has had procedure for internal audit in SOP Internal Audit (SPO/SMART/UMUM/SADV/I/009). According to the document, facility will conducted internal audit annually. The last internal audit of supply chain conducted on 25 March – 2 April 2019. There was no nonconformity record identified during the audit. However, facility has conducted management review on 6 May 2019.	
	Status: Comply
5.13.3 The output from the management review shall include any decisions and actions related to: <ul style="list-style-type: none"> • Improvement of the effectiveness of the management system and its processes. • Resource needs. 	
Facility has had procedure for internal audit in SOP Internal Audit (SPO/SMART/UMUM/SADV/I/009). According to the document, facility will conducted internal audit annually. The last internal audit of supply chain conducted on 25 March – 2 April 2019. There was no nonconformity record identified during the audit. However, facility has conducted management review on 6 May 2019.	
	Status: Comply

3.2.2 (Module D) CPO Mills – Identity Preserved Requirements

Clause	Requirement																
D1	Definition																
D.1.1 A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from plantation/ estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Module E is applicable.																	
There is no change of the IP procedure.																	
Facility only received FFB from 5 (five) certified sources such as: <ul style="list-style-type: none">• Sungai Rungau Estate (SRGE)• Sungai Seruyan Estate (SSRE);• Terawan Estate (TRWE);• Tangar Estate (TNGE)• Bukit Tiga Estate (BTGE).																	
According to the RSPO supply chain certification standard, mill used the specific module for mill which is Module d – CPO Mills: Identity Preserved.																	
During the field visit, the traceability personnel, Head of Administration, Security and weighbridge officer can explain the received certified FFB according to the scope of SCCS model.																	
Status: Comply																	
D.2	Explanation																
D.2.1 The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the certification body (CB) in the public summary of the P&C certification report. For an independent mill, the estimated tonnage of CPO and PK products must be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report																	
Facility estimated their palm product which is written in annex of initial assessment certificate and monitored in three-monthly bases. If any overproduction, facility will inform the CB to extend their volume.																	
<table><tr><th>Product</th><th>Estimation of Certified Product (MT)</th><th>Actual Production 12 Month before audit (May 2018 – April 2019) (MT)</th><th>Projected production of the next license period (MT)</th></tr><tr><td>FFB</td><td>463,173</td><td>452,228</td><td>494,841</td></tr><tr><td>CPO</td><td>101,898</td><td>95,937</td><td>111,339</td></tr><tr><td>PK</td><td>25,474</td><td>25,060</td><td>27,216</td></tr></table>		Product	Estimation of Certified Product (MT)	Actual Production 12 Month before audit (May 2018 – April 2019) (MT)	Projected production of the next license period (MT)	FFB	463,173	452,228	494,841	CPO	101,898	95,937	111,339	PK	25,474	25,060	27,216
Product	Estimation of Certified Product (MT)	Actual Production 12 Month before audit (May 2018 – April 2019) (MT)	Projected production of the next license period (MT)														
FFB	463,173	452,228	494,841														
CPO	101,898	95,937	111,339														
PK	25,474	25,060	27,216														
Source: production data 12 month before audit (May 2018 – April 2019)																	
Status: Comply																	
D.2.2 The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform).																	

PT. Binasawit Abadi Pratama - Sungai Rungau Palm Oil Mill, subsidiary of Golden Agri Resources Ltd has registered in RSPO membership 1-0096-11-000-00 since 31 March 2004.

Sungai Rungau Palm Oil Mill has been registered in IT platform palm trace RSPO <https://palmtrace.rspo.org/web/rspo/member-directory> which information as follows:

- Member Name: PT. Binasawit Abadi Pratama - Sungai Rungau Palm Oil Mill
- Account UID: RSPO_AC1000001184
- Core Product: Palm Oil
- Member ID: RSPO_PO1000001155
- Type of Business: Oil Mill

Status: Comply

D.3 Documented procedures

D.3.1

The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall

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

There is no change of the IP procedure.

SOP on RSPO SCCS Model Identity Preserved (PT BAP-SRUM/SOP/28) dated 1 June 2015 composed by document controller, checked by Mill Manager and approved by Production Controller. The procedure covers RSPO SCCS referred to RSPO SCCS 21 November 2014 and RSPO SCC Standard Module D CPO Mills: Identity Preserved, 21 November 2014 and SOP of Palm Oil Mill Processing, PT SMART 2013.

The personnel involved are mentioned in part 3 of the procedure who are security, weighbridge clerk, Mill/Estate/KCP Assistants, Administration Head, Production Controller and Support Department.

During the field visit, the traceability personnel, Head of Administration, Security and weighbridge officer can explain the received certified FFB according to the scope of SCCS model.

Status: Comply

D.3.2

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

It is explained in point 6.1 on raw materials and point 6.4 on the raw materials processing SOP SCCS PT BAP SRUM/SOP/28 dated 1 June 2015. Stated that the declaration of Sungai Rungau Mill Management Representatives on 1 May 2014 that the model SCCS is effectively applied since 1 May 2014. The company is able to show that the received FFB is in accordance with the certified FFB supplier list and processed into CPO and PK. The daily production report and processed FFB balance sheet shows that CPO Mill has mechanism and documented in SCCS Module IP.

Status: Comply

D.4 Purchasing and goods in

D.4.1

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

Facility has recorded amount of FFB received in daily, monthly and three-monthly bases. The sum of FFB received from certified and uncertified area documented as follows:

Month	FFB (MT)		
	RSPO Certified	Non-Certified	Total
May 2018	41,130	-	41,130

June 2018	35,882	-	35,882
July 2018	48,917	-	48,917
August 2018	46,226	-	46,226
September 2018	40,132	-	40,132
October 2018	44,287	-	44,287
November 2018	37,700	-	37,700
December 2018	27,990	-	27,990
January 2019	32,537	-	32,537
February 2019	29,875	-	29,875
March 2019	32,432	-	32,432
April 2019	35,121	-	35,121
Total	452,228	-	452,228

Source: production data 12 month before audit (April 2018 – March 2019)

Status: Comply

D.4.2

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

Facility estimated their palm product which is written in annex of initial assessment certificate and monitored in three-monthly bases. If any overproduction, facility will inform the CB to extend their volume.

Product	Estimation of Certified Product (MT)	Actual Production 12 Month before audit (May 2018 – April 2019) (MT)
FFB	463,173	452,228
CPO	101,898	95,937
PK	25,474	25,060

Source: production data 12 month before audit (May 2018 – April 2019)

Status: Comply

D.5 Record keeping

D.5.1

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

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 book keeping data 12 month before audit (May 2018 – April 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 IP	RSG	ISCC	Conventional	
May 2018 – April 2019	95,937	-	95,937	5,404	14,388	75,864	-	95,656

Period	PK Production (MT)		Total	Cert PK Dispatch (MT)				Total
	Cert	Non Cert		RSPO	RSG	Other scheme	Conventional	
May 2018 – April 2019	25,060	-	25,060	23,045	-	-	2,013	25,058

Status: Comply

D.6	Processing
D.6.1	The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm product including during transport and storage to strive for 100% separation.
	During the audit known that Sungai Rungai Mill only FFB receives and processed from 100% certified material. There is no contamination from non-certified sources, includes the FFB transport and CPO & PK storage.
	Status: Comply

3.3 Conformity Checklist of Certificate and Logo Use

1.	Evidence of permission or approval certificate and logo from Certification Body which submitted by Client	X or √
ASA-1.1	Sungai Rungau Mill – PT. Binasawit Abadipratama does not use RSPO logo.	√
	Status: Comply	
2.	Implementation of certificate and logo used by Client comply with size and type (shape) against Guideline of Logo Use	X or √
ASA-1.1	Sungai Rungau Mill – PT. Binasawit Abadipratama does not use RSPO logo.	√
	Status: Comply	
3.	Implementation of Certificate and Logo is not used on product	X or √
ASA-1.1	Sungai Rungau Mill – PT. Binasawit Abadipratama does not use RSPO logo.	√
	Status: Comply	
4.	Controlling of Certificate and Logo, including withdrawing inappropriate logo.	X or √
ASA-1.1	Sungai Rungau Mill – PT. Binasawit Abadipratama does not use RSPO logo.	√
	Status: Comply	

3.4 Summary of RSPO Partial Certification

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

Golden Agri Resources, Ltd Time Bound Plan (TBP) is explained in table 1.10. Golden Agri Resources run eighteen (45) mills and one hundred seventy six (176) estates in Indonesia and has been RSPO certified for twenty nine (29) mills and supply base in Indonesia. Golden Agri Resources, Ltd has informed the TBP progress, MUTU has considered that Golden Agri Resources, Ltd is comply with the RSPO requirement for TBP. The Time Bound Plan was revised and declared by Golden Agri Resources, Ltd on January 31, 2016 approved by President Director and MO Sustainability Strategic & Stakeholders Engagement.

MUTU has verified partial certification for un-certified unit's subsidiary of Golden Agri Resources, Ltd based on their Time Bound Plan. There are sixteen (16) uncertified management unit of GAR. MUTU Auditor verified positive assurance against the company internal audit and supporting evidence as well as any information from others sources.

MUTU Auditor has verified company partial certification and concludes that:

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

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.2.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p>Company Group/Holding Statement: Companies are already doing internal audits. There are internal audit reports for each company.</p> <p>Auditor Verification: Internal Audit report available for uncertified management unit:</p> <ul style="list-style-type: none"> - PT Sinar Kencana Inti Perkasa (Sungai Kupang Mill and supply base) - PT Sinar Kencana Inti Perkasa (Kasuari Mill and supply base) - PT Agrolestari Mandiri (Pekawai Mill and supply base) - PT Binasawit Abadi Pratama (Perdana Mill and supply base) - PT Agrokarya Prima Lestari (Kuayan Mill and supply base), monitoring via SPO Scorecard online. - PT Mitra Karya Agroindo (Tangar Mill and supply base), monitoring via SPO Scorecard online. - PT Paramitra Internusa Pratama (Belian Mill and supply base) - PT Sawit Mas Sejahtera (Sungai Kikim and supply base), monitoring via SPO Scorecard online. - PT Sinar Kencana Inti Perkasa (Sungai Magalau Mill and supply base) - PT Agro Lestari Sentosa (Jalemo Mill and supply base), monitoring via SPO Scorecard online - PT Adi Tunggal Mahajaya (Sako Mill) (under construction) - PT Kresna Duta Agroindo (Pelakar Mill and supply base) - PT SMART (Bukit Kapur Mill and supply base)

		<ul style="list-style-type: none"> - PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base) - PT Kresna Duta Agroindo (Gunung Kombeng Mill and supply base) - PT Sawitakarya Manunggal (Sawita Mill and supply base)
i.	<p>No replacement after dates defined in NIs Criterion 7.3 of:</p> <ul style="list-style-type: none"> • Primary forest. • Any area identified as containing High Conservation Values (HCVs). • Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3. 	<p>Company Group/Holding Statement: GAR and its subsidiaries have been reporting disclosure and zero liability to RSPO by email dated August 29, 2014 and the company has been sent data evidence of LUCA to RSPO by email dated April 11, 2016. Progress result of review LUCA at follow-up via email RSPO dated October 24, 2016 and RSPO answer related LUCA are still in the review process. On April 30 2018, GAR has sent LUCA revision to RSPO. And the latest response for RSPO was on January 8 2019, stated that LUCA are still on progress review.</p> <p>Auditor Verification: RaCP Process for:</p> <ul style="list-style-type: none"> - PT Agrolestari Mandiri (Pekawai Mill and supply base) - PT Sinar Kencana Inti Perkasa (Sungai Kupang Mill and supply base) - PT Sinar Kencana Inti Perkasa (Sungai Magalau Mill and supply base) - PT Agro Lestari Sentosa (Jalemo Mill and supply base) - PT Kresna Duta Agroindo (Pelakar Mill and supply base) - PT SMART (Bukit Kapur Mill and supply base) - PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base) - PT Satya Kisma Usaha (Sungai Bengkal Mill and supply base)
ii.	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>Company Group/Holding Statement: There is no new planting.</p> <p>Auditor Verification: Based on auditor verification there are some new planting conducted by company, but NPP has been applied these.</p> <ul style="list-style-type: none"> - PT Binasawit Abadi Pratama (Perdana Mill and supply base) - PT Agrokarya Prima Lestari (Kuayan Mill and supply base) - PT Mitra Karya Agroindo (Tangar Mill and supply base) - PT Paramitra Internusa Pratama (Belian Mill and supply base) - PT Agrolestari Mandiri (Pekawai Mill and supply base) - PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base) <p>any new planting since January 1st 2010 and NPP has been applied these.</p>
iii.	Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	<p>Company Group/Holding Statement: There are no land conflicts. The Company has a land conflict resolution mechanism in accordance with the RSPO criteria 6.4; 7.5; and 7.6. This procedure is outlined in the SOP Social Conflict Management (SOP/SMART/SENS-CSR/SADV/I/02). This procedure regulates social conflict settlement agreed. Conflict resolution can be done in a participatory manner and can also be done by a third party (mediator). The company also has procedures to deal with complaints before they become conflicts. The procedure is SOP/SMART/SIGS-CSR/SADV/I/003. The company handling complaints appropriately and quickly. GAR has been initiated to become a member of RSPO DSF as a category "out growers".</p>

		<p>Auditor Verification:</p> <p>Auditor has verified the supporting evidence of above the company statement. There are no land conflicts for</p> <ul style="list-style-type: none"> - PT Sinar Kencana Inti Perkasa (Sungai Kupang Mill and supply base) - PT Mitra Karya Agroindo (Tangar Mill and supply base) - PT Kresna Duta Agroindo (Pelakar Mill and supply base) - PT SMART (Bukit Kapur Mill and supply base) <p>There are any land conflicts but was in the process of completion for</p> <ul style="list-style-type: none"> - PT Agrolestari Mandiri (Pekawai Mill and supply base) - PT Sinar Kencana Inti Perkasa (Sungai Magalau Mill and supply base) - PT Sawit Mas Sejahtera (Sungai Kikim and supply base) - PT Agro Lestari Sentosa (Jalemo Mill and supply base) - PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base) - PT Kresna Duta Agroindo (Gunung Kombeng Mill and supply base)
iv.	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	<p>Company Group/Holding Statement:</p> <p>There is no issue of labour disputes in uncertified unit. The company also has procedures to deal with complaints workers before they become conflicts. The procedure is SOP/SMART/SIGS-CSR/SADV/I/003.</p> <p>Procedures related employee issues is arranged in the form of internal grooves for employees included in the category of internal stakeholders. Media that is used to deliver complaint is a formal letter submitted by unions or incorporated into a suggestion box which is provided in a convenient location.</p> <p>Auditor Verification:</p> <p>There is complaint case related to labor dispute (https://askrspo.force.com/Complaint/s/casetracker) In uncertified unit (PT Agro Lestari Mandiri), that in a positive progress to the resolution with mediation via the Dispute Settlement Facility.</p>
v.	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	<p>Company Group/Holding Statement:</p> <p>Companies comply with the regulations in accordance with the requirements of the RSPO 2.1 and 2.2 where there is no violation of the rules that are relevant to the plantation. The company has a mechanism to evaluate compliance with regulations, namely SOP/SMART/UMUM/SADV/I/002. In SOP describes procedures for compliance, completeness and groove sections which explain in detail to evaluate compliance with the legislation.</p> <p>Auditor Verification:</p> <p>Land legal process is still going on and there is a detail update progress documented by the company for each year.</p> <ul style="list-style-type: none"> - PT Paramitra Internusa Pratama (Belian Mill and supply base), still in the process of Committee B and the company has got plantation business permit (IUP) - PT Sinar Kencana Inti Perkasa (Kasuari Mill and supply base), there is a legal non-compliance. - PT Agro Lestari Sentosa (Jalemo Mill and supply base) and PT Adi Tunggal Mahajaya (Sako Mill) doesn't have Land Use Title (HGU).

	<ul style="list-style-type: none"> - PT Kresna Duta Agroindo (Pelakar Mill and supply base), there is a difference the concession area between Land Use Title (HGU) and Plantation Business Permit (IUP) and Permits Location. - PT SMART (Bukit Kapur Mill and supply base, doesn't have land use title (HGU), the HGU is still on process. - PT Sawitakarya Manunggal there is an area is still in process for HGU (Committee B meeting). - PT Djuanda Sawit Lestari is an area is still in process for HGU Muara Kandis Estate (574.58 Ha) - PT Ivomas Tunggal there is an area is still in process for HGU Samsam Estate (29.09 Ha), Kandista Estate (158.46 Ha), Nenggala Estate (419.9 Ha), Sei Rokan Estate (102.7 Ha), Ujung Tanjung Estate (557.3 Ha) - PT Buana Wiralestari Mas there is an area is still in process for HGU Naga Mas Estate (253.39 Ha), Naga Sakti Estate (59.79 Ha), Kijang Mas Estate (56.07 Ha) - PT Ramajaya Pramukti there is an area is still in process for HGU Rama Rama Estate (318.76 Ha) - PT Sumber Indah Perkasa. there is an area covered 241.54 ha (Sungai Merah estate), 73.71 ha (Sungai Buaya estate), and 26.18 ha (Sungai Buaya estate) are still on HGU process. <p>Suspicion of bribery allegedly committed by employees of PT Binasawit Abadi Pratama (BAP). Management unit gave response to CB through email on 9 November 2018 that stated PT BAP will cooperate fully with the KPK investigation.</p>
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3.5 Identification of Findings, Corrective Action, Observations, OFI and Noteworthy Positive Components

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

NCRNo.	:	-	Issued by	:	-
Date Issued	:	-	Time Limit	:	-
NC Grade	:	-	Date of Closing	:	-
Standard Ref. & Requirement	:	-			
Non-Conformance Description& Evidence observed :					
<i>During Recertification Assessment, Non-Conformities against P&C Standard and Requirement of Supply Chain is absence.</i>					
Root Cause Analysis:					
-					
Corrective Action:					
-					
Preventive Action:					
Assessor Evaluation and Conclusion:					
-					
Verified by	:	-			

3.5.2 Identification of Findings, Corrective Actions and Observations at ASA-1.1 Assessment

NCR No.	: 2019.01	Issued by	: Steve Mualim
Date Issued	: 24 May 2019	Time Limit	: ASA-1.2
NC Grade	: Minor	Date of Closing	:
Standard Ref. & Requirement	: 5.2.4 Once the management plan is prepared, continuous monitoring documentation and report regarding the status of the RTE and HCVs are affected by the operations of the plantation and palm oil mill shall be available, and the results of monitoring are to be used to follow-up on the improvement of the management plan.		
Evidence observed (filled by auditor): PT BAP has conducted HCV assessment for entirely operational areas on 2012, this assessment explained there is some HCV attributes presence on SSRE for examples HCV 1.1, 1.2, 1.3,4.1, and 6 covered areas for 574.46 ha. Company commitment regarding HCV protections and managements are listed on some procedures and policy as follows : GAR Social and environmental policy on 2015 and HCV management dan monitoring procedures SOP/SMART/BCOS-EHSD/SADV/II/002 on 2014. This procedures also explained company effort regarding HCV areas protections were by regular patrols and monitoring. Monitoring results for examples periods 2018, found there is no encroachment insident on HCV areas by community. Field observation on SSRE block O20 found that Rungau riparian (HCV 4) are encroched by community. Document review shown that occupant has "Surat Keterangan Tanah" issued by Rungau Raya head of village with SKT no 140/708/Pem-RR/V/2014 dated May 5 2014 for 20000 m ² areas. Auditor teams also have interviewed those occupant (namely Muslimin) dan based on interviewed acquired information that land clearing on HCV areas were conducted by the end of 2015 and suspected there is another occupant on company HCV areas.			
Non-Conformance Description (filled by auditor): Implementation regarding HCV monitoring and management are not able to identified the occurence of occupancy by local community on company appointed HCV areas			
Root Cause Analysis (filled by organization audited):			
Correction (filled by organization audited):			
Corrective Action (filled by organization audited):			
Assessor Evaluation and Conclusion (filled by auditor):			
Verified by	:		

NCR No.	: 2019.02	Issued by	: Rindu Galih Rezza Rachmansyah
Date Issued	: 24 May 2019	Time Limit	: 23 August 2019
NC Grade	: Major	Date of Closing	: 23 July 2019
Standard Ref. & Requirement	: 6.5.1 Documentation of pay and conditions for employees based on the existing manpower regulations shall be available.		
Evidence observed (filled by auditor): Based on the results of a review of the list of workers' documents, it is known that the company has 80 workers in the Seruyan Estate and 101 workers in Bukit Tiga Estate. Workers with PKWT (Contract Worker) status who work as harvesters are 20 workers in Sungai Seruyan Estate and 22 workers in Bukit Tiga Estate. Harvesting work is work that is permanent in the operations of the plantation and may not be carried out by workers with PKWT (contract worker) status.			
Non-Conformance Description (filled by auditor): The company has not been able to prove that the labor recruitment system is in accordance with Minister of Manpower Decree No. 100 of 2004 concerning Provisions for the Implementation of Specific Time Work Agreements and Law No. 13 of 2003 concerning Manpower.			
Root Cause Analysis (filled by organization audited): <ul style="list-style-type: none"> The company has a memo / policy structure of Permanent Workers' rank (basic harvesters become permanent employees with PT3 class), but the implementation of the policy has not been comprehensive for new employees as Harvesters. For harvesting work requires skill and experience so an assessment period is needed. Assumptions of the performance and productivity assessment period in the view of the leaders of PT Binasawit Abadipratama are harvesters employees who have just been accepted to work as employees with PKWT status first, and then are appointed as permanent employees of PT3 (permanent worker) groups. 			
Correction (filled by organization audited): <ul style="list-style-type: none"> The Estate Manager submits an application for the appointment of harvesters who are still PKWT (contract worker) to PKWTT (permanent worker). The Estate Manager appoints / receives PKWT Harvesters employees currently at PT Binasawit Abadipratama to become PT3 / PKWTT employees (Indefinite-Time Work Agreement / permanent employees) in accordance with Law No. 13 of 2003 concerning employment. 			
Corrective Action (filled by organization audited): HROps PSM Central Kalimantan reaffirmed via email addressed to the head of the PT Binasawit Abadipratama plantation unit on July 22, 2019 for the acceptance of harvesters to become PKWTT based on Decree of the Managing Director of Human Resources No. 036 / MDHR / 11/2017 and Environmental & Industrial Relations Policy No. KHI-smart / 022-00.			
Assessor Evaluation and Conclusion (filled by auditor): Verification July 23, 2019 The company has provided evidence of improvement in accordance with the determination of the root cause, corrective and corrective actions, including: <ul style="list-style-type: none"> Decree of Managing Director of Human Resources No. 036 / MDHR / 11/2017 concerning the Position Structure and Rank of Permanent Workers in Agronomy and Mill. 			

- List of PKWT Harvesters workers who explain the length of service and other information for the period 2018 - 2019.
- Evidence of documents submitting approval for acceptance of PKWT Harvesters workers to PKWTT (permanent employees with PT3 class)
- PKWTT Agreement Harvesting workers who have been appointed as permanent employees with PT3 groups in Sungai Seruyan and Bukit Tiga Estate
- Environmental and Industrial Relations Policy No. KHI-smart / 022-00 concerning Structure of Workers / Workers' Departments
- Evidence of the Central Kalimantan HROps email to the head of the unit on July 22, 2019.

Based on the evidence provided along with determining the root of the problem, the corrective and corrective actions given, **the non-conformity No. 2019.02 declared Fulfilled and will be observed again at the time of the next assessment.**

Verified by	:	Rindu Galih Rezza Rachmansyah
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3.5.3 Opportunity for Improvement

No	Ref Std	Descriptions
1	2.1.1	Ensuring the process for obtaining an airstrip permit
2	4.7.6	Ensure BPJS Employment monitoring for contractor workers
3	-	-

3.5.4 Noteworthy Positive Components

No	Description
1	Management's commitment to apply the principles of sustainable management of oil palm.
2	Personal competence related to meeting sustainable palm oil certification standards.
3	Holds sustainable palm oil certificates (ISPO and ISCC).
4	Sungai Rungau Mill has received a BLUE PROPER for 2017-2018 from the Ministry of Environment & Forestry
5	Implementation of the e-FACT system to replace manual recording by SPB
6	The company already has Biogasplant as an effort to reduce GHG emissions

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

Public Issues (Institution/ NGO/Community)	Auditor Verification
Environmental Agency of Seruyan Regency (Mr. Samsul Bahri – Environmental Arrangement Section) <ul style="list-style-type: none"> The company has environmental permit documents such as EIA and Environmental Management/Monitoring Plan. Other environmental permits held are still valid today such as Hazardous Waste Temporary Warehouse Permit and Land Application Permit (LA). The company has routinely reported mandatory reports in accordance with their respective periods such as the Environmental Management/Monitoring Plan Report, Hazardous Waste Management Report, and Liquid Waste Management Report. The “PROPER” assessment for PT Binasawit Abadipratama was carried out by the Environmental Agency of Kalimantan Tengah Province. During the past year there have been no reports or issues related to environmental pollution caused by plantation operations and factories. There were no records, reports or fire incidents during the past year. The company has also reported the results of identification of conservation areas and their management regularly to the agency. The last implementation of the agency's environmental supervision carried out at the company was in March 2019. During the monitoring activities carried out there were no records relating to violations / errors in fulfilling environmental regulations. 	<p>The company has documents related to environmental permits required by the government, this is further explained in criteria 4.1.</p> <p>Reports must be reported regularly by the company to the relevant agencies in accordance with applicable regulations.</p> <p>There were no issues or events related to environmental pollution that occurred in the company's area.</p>
Manpower & Transmigration Agency of Seruyan Regency (Mr. Wiktor T Nyarang – Head of Agency). <ul style="list-style-type: none"> Determination of minimum wages for Seruyan District in 2019 based on the Decree of the Governor of Central Kalimantan No. 51/2018 21 November 2018 concerning the District / City Minimum Wage for Central Kalimantan in 2019, where the minimum wage for workers in the plantation sector is IDR 2,930,000. The Mandatory Report on Manpower Reporting is done online and manually by the company due to difficult internet access so the agency recommends that it be done online and manually. The company's 2019-2021 Collective Labor Agreement (CLA) was approved by the agency on 04 February 2019. The agency carries out routine guidance (3-6 months) to companies related to employment by providing socialization to workers. The majority of workers at PT Binasawit Abadipratama currently come from communities around the company. There is a policy from the Regent of Seruyan to all companies in Seruyan Regency to prioritize the 	<p>The company has implemented regulations on minimum wages, overtime payment and has a Collective Labor Agreement in accordance with government regulations, this is further explained in the indicators 6.5.1 and 6.5.2</p> <p>Based on the results of document studies and interviews with workers in the field it is known that so far there have been no issues related to child labor, sexual harassment, human rights violations and acts of discrimination that occur in the company environment.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>recruitment of workers from the surrounding community and provide information on job vacancies along with their requirements to the village. If the village does not have adequate human resources, it is obligatory to issue a statement so that the company can recruit workers from outside.</p> <ul style="list-style-type: none"> • Employment guidance from the last agency was carried out in March 2019 and there were no records / employment issues in the company. • The agency has a group on Social Media (Whatsapp) as a means of giving and requesting information to all companies in Seruyan Regency. So far the response from PT Binasawit Abadipratama related to information requests has been quite good. • The company has a wage structure and scale for all workers • During the past year there were no issues related to human rights violations, sexual harassment, child labor and discrimination that occurred in the operational scope of the company. 	
<p>Food Security & Counseling of Seruyan Regency (Mr. Albidin Nur – Section Head of Plantation)</p> <ul style="list-style-type: none"> • The company has a Location Permit, Plantation Business Permit and Land Ownership Permit (HGU) which is still valid today. • The company has reported routine reports such as CSR Reports, Plantation Business Progress Reports, and Fire Prevention & Mitigation Reports. • The latest Plantation Business Assessment (PUP) was carried out in 2015 and PT Binasawit Abadipratama received Plantation Class II. • The new Plantation Business Assessment (PUP) was conducted at the beginning of 2019 and until now the results of the assessment have not yet been issued by the Governor of Central Kalimantan. • The company has fire facilities that are sufficient to prevent and control fires in the operational area. • The company has a pesticide application officer who has received a limited pesticide certificate from the Pesticide Commission. 	<p>There were no negative issues related to operational activities at PT Binasawit Abadipratama during the past year and in general the company's legality permits for plantation activities had been fulfilled.</p>
<p>National Land Agency of Seruyan Regency (Mr. Bambang – Head of Agency)</p> <ul style="list-style-type: none"> • Cannot be contacted due to being on the way to Palangkaraya for work purposes. 	<p>The auditor has tried to contact related parties from the 21 until 23 May 2019, but did not get a response from the concerned person.</p>
<p>Gender Committee of Sungai Rungau, Bukit Tiga Estate & Sungai Seruyan Estate (Mrs. Suwarti, Mrs. Mardiah & Mrs. Irawati)</p> <ul style="list-style-type: none"> • The routine activity of a gender committee is to monitor female workers in their daily work or activities in their home environment. 	<p>Regarding the H1 / H2 leave, the policies, program activities and management of the gender committee are explained further in criterion 6.9</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> The gender committee management has a routine agenda for the activities of female workers and workers' families every month such as routine recitation every 2 weeks and grand recitation every 3 months in each unit. During the past year there were no issues / events related to sexual harassment, discrimination, human rights violations and child labor in the company's operational environment. "Posyandu" activities are carried out and accompanied by gender committee administrators conducted in the first week of each month. Sports activities for female workers and their families are carried out twice a week Understanding of female workers related to H1 and H2 leave has been well understood The prohibition of pregnant and lactating workers working in jobs related to chemicals has been understood and always controlled by the company. H1 control and pregnancy for female workers are carried out every month as a precautionary measure for female workers 	<p>Based on the results of document studies and interviews with workers in the field it is known that so far there have been no issues related to child labor, sexual harassment, human rights violations and acts of discrimination that occur in the company environment.</p>
<p>Work Unit Management of labor Union in Sungai Rungau, Sungai Seruyan Estate and Bukit Tiga Estate (Mr. Harjono, Mr. Toufik, and Mr. Sugeng)</p> <ul style="list-style-type: none"> The minimum wage used today is the District Sectoral Minimum Wage for Seruyan Regency in 2019 of IDR 2,930,000. The company has a wage structure and scale for each worker according to their abilities and occupations. All workers get PPE for free and if the PPE used is damaged it will be replaced directly by the company by showing the damaged PPE. Payment of wages every month is already using the Bank (via transfer) At present there are only 2 workers type in the company, namely Permanent Workers and "PKWT" Workers (Certain Time Work Agreements). Payment and calculation of overtime workers are in accordance with government regulations. The company provides attendance premiums to all employees in the form of 17 kg of rice every month. During the past one year there has never been a fatal accident, the accident that occurred was only a minor accident. Routine (general and specific) health checks for workers have been carried out every year by the company and the results of the inspection will be socialized at the time of the muster morning. Labor Unions conduct bipartite meetings regularly every month between the company and union officials to 	<p>The Company has implemented minimum wages and other labor regulations in accordance with applicable regulations and is explained in the 2.1.1 and 6.5.1 indicators</p> <p>Based on the results of field visits and interviews with workers it is known that the company has provided PPE for all workers free of charge and routine replacement.</p> <p>Based on the results of document studies and interviews with workers in the field it is known that so far there have been no issues related to child labor, sexual harassment, human rights violations and acts of discrimination that occur in the company environment.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>discuss existing labor issues.</p> <ul style="list-style-type: none"> • During the past year there were no negative issues related to employment. • During the past year there were no issues / events related to sexual harassment, discrimination, human rights violations and child labor in the company's operational environment. 	
<p>Local Contractor for CPO Transporter (CV Bina Perkasa – Mr. Gatot) and Local Contractors for FFB Transporter (Mr. Ponijo & Mr. Umiyanto)</p> <ul style="list-style-type: none"> • In carrying out its work, the contractor always has a work contract as the basis for starting work in the operational scope of the company. • In the employment contract, it is explained about the period of work, type of work, work costs, obligations and rights, and other information. • Contractor workers have been included in the “BPJS” Employment program by the contractor as fulfillment of the clauses contained in the contract agreement. • The contractor provides facilities in the form of PPE for all workers while working in the company's operational scope. • Payment for completion of work is done on time by the company in accordance with what is written in the employment agreement. • The company always provides K3 outreach to contractor workers when starting work or at certain times. • The company also always provides socialization related to company policies, especially the code of ethics policy to the contractor before signing the contract. 	<p>Based on document verification, show that the rights and obligation of each party has been set in the contract.</p>
<p>Worker Cooperation of Bangkit Bersama, Bina Seruyan & Bukit Mandiri</p> <ul style="list-style-type: none"> • The company is very supportive in the formation of employee cooperatives by providing assistance in arranging the deed of establishment and approval. • The RATE of the 2018 financial year has been conducted at the beginning of 2019 which is documented in the minutes of RAT 2019. • Distribution of Remaining Business Results/Net Income (SHU) of cooperative employees is given to members when the RAT activity is carried out. • At present the members of the cooperative are required to provide routine contributions to the cooperative in the form of basic contributions and compulsory contributions, the amount of which is in accordance with the members' agreement. • Giving Remaining Business Results/Net Income, payment of basic contributions, mandatory contributions and cooperative deductions is made through salary payroll every month. 	<p>The Companies have policies, support the formation and activities of employee cooperatives, where the main goal is as an organization that can prosper the company's workers.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Rungau Raya Village Village Head and Community Leader</p> <p>There is a good relationship between the company and villager's, especially Rungau Raya. Some villager recruited as employees and other as local contractor (FFB and CPO transport, upkeep etc). No land dispute case until the audit.</p> <p>The company has empowering local peoples through the CSR plan. The last donation is an ambulance for the villagers of Rungau Raya.</p>	<p>According to criteria 2.3, there is no land dispute so far.</p>
<p>Pantap Village Village Head and Community Leader</p> <p>There is no land dispute or any other issues that disturbing the company's operational.</p> <p>Aspiration: villagers asked the company to help them to build the new wells to ensure them get potable water.</p>	<p>According to criteria 2.3, there is no land dispute so far.</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 and audit team to acknowledge a field assessment and agree for all content explained in this assessment report, included of nonconformities issues.

Signed on behalf of:

PT Binasawit Abadipratama
Management Representative

A handwritten signature in black ink, appearing to be 'Ismu Zulfikar'.

Ismu Zulfikar

Tuesday, 23 July 2019

PT Mutuagung Lestari
Lead Auditor

A handwritten signature in black ink, appearing to be 'Andi Pratama Pasaribu'.

Andi Pratama Pasaribu

Tuesday, 23 July 2019

APPENDICES
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	Manpower and Transmigration Agency	Seruyan District, Central Kalimantan Province	-	Interview by phone	21 May 2019	✓	
2	Environmental Agency	Seruyan District, Central Kalimantan Province	-	Interview by phone	21 May 2019	✓	
3	Food Security & Counseling Agency	Seruyan District, Central Kalimantan Province	-	Interview by phone	21 May 2019	✓	
4	National Land Agency	Seruyan District, Central Kalimantan Province	-	Interview by phone	21 May 2019		✓
5	Labour Union of Sungai Seruyan Estate	Seruyan District, Central Kalimantan Province	-	Interview	21 May 2019	✓	
6	Labour Union of Bukit Tiga Estate	Seruyan District, Central Kalimantan Province	-	Interview	21 May 2019	✓	
7	Labour Union of Sungai Rungau Mill	Seruyan District, Central Kalimantan Province	-	Interview	21 May 2019	✓	
8	Gender Committee of Sungai Seruyan Estate	Seruyan District, Central Kalimantan Province	-	Interview	21 May 2019	✓	
9	Gender Committee of Bukit Tiga Estate	Seruyan District, Central Kalimantan Province	-	Interview	21 May 2019	✓	
10	Gender Committee of Sungai Rungau Mill	Seruyan District, Central Kalimantan Province	-	Interview	21 May 2019	✓	
11	Worker of Sungai Seruyan Estate Cooperative	Seruyan District, Central Kalimantan Province	-	Interview	21 May 2019	✓	
12	Worker of Bukit Tiga Estate Cooperative	Seruyan District, Central Kalimantan Province	-	Interview	21 May 2019	✓	
13	Worker of Sungai Rungau Mill Cooperative	Seruyan District, Central Kalimantan Province	-	Interview	21 May 2019	✓	
14	Local Contractor of FFB transport (Umiyanto)	Seruyan District, Central Kalimantan Province	-	Interview	21 May 2019	✓	
15	Local Contractor of FFB transport (Ponijo)	Seruyan District, Central Kalimantan Province	-	Interview	21 May 2019	✓	
16	Local Communities of Rungau Raya Village Also as previous land owner	Seruyan District, Central Kalimantan Province	-	Interview	21 May 2019	✓	
17	Local Communities of Pantap Village Also as previous land owner	Seruyan District, Central Kalimantan Province	-	Interview	21 May 2019	✓	
18	8 harvester, and 8 Pesticide Applicator, 2 loader FFB	Sungai Rungau Estate	-	Interview	21-23 May 2019	✓	
19	5 Pesticide Applicator, 5 Fertilizer Applicator, 4 harvester, 2 loader FFB.	Tangar Estate	-	Interview	21-23 May 2019	✓	
20	13 worker (security, loading ramp, weighbridge, workshop, sterilizer, press, boiler, engine room and kernel station)	Sungai Rungau POM	-	Interview	21-23 May 2019	✓	
21	Walhi	Jakarta	info@walhi.or.id	Questionnaire through email	15 May 2019		✓
22	AMAN	Jakarta	informasi@walhi.or.id	Questionnaire through email	15 May 2019		✓

23	WWF Indonesia	Jakarta	wwf-indonesia@wwf.or.id	Questionnaire through email	15 May 2019		✓
24	Sawit Watch	Jakarta	info@sawitwatch.or.id	Questionnaire through email	15 May 2019		✓

Appendix 2. Assessment Program

Date	20 - 25 May 2019	
PROGRAM	AUDIT PROCESS	AUDITOR
Monday, 20 May 2019		
07.45 – 09.10 09.10 – 12.00	JAKARTA → SAMPIT (IN-172) SAMPIT → SITE PT. BINASAWIT ABADI PRATAMA Stakeholders consultation to Government Institution of Seruyan District (by phone)	All Auditor APP
12.00 – 14.00	BREAK	All Auditor
14.00 – 17.00	OPENING MEETING Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Determine of Field Visit, Transparency and Confidentiality Clarification)	All Auditor
Tuesday, 21 May 2019		
08.00 – 12.00	Public consultation with previous land owner (if any) and local communities surrounding the plantation area	APP
08.00 – 12.00	Field Observation SUNGAI SERUYAN ESTATE <ul style="list-style-type: none"> Best agricultural practices (manuring, spraying, harvesting, EFB application etc) Worker Welfare (payments, complaint mechanism) Hazardous Waste Material (B3) management; Worker facilities (housing, health clinic, clean water, etc), Land fill, Fire fighting facilities , Storage, ect. Legal operational and Conservation Area 	AMR/RGR AMR/RGR STV APP
12.00 – 14.00	BREAK	All Auditor
14.00 – 15.00	Public consultation with gender committee, labor union and local contractor	RGR
14.00 – 17.00	Document Review	All Auditor
Wednesday, 22 May 2019		
08.00 – 12.00	Field Observation to SUNGAI RUNGAU POM <ul style="list-style-type: none"> Process Station, Safety Aspect and Worker Welfare (Grading – despatch) ETP; WTP; Hazardous Waste Warehouse; Drainage; Collecting place of fiber, Water Discharge, Hazardous Warehouse; Workshop, Chemical Store. Supply Chain 	AMR/RGR STV APP
12.00 – 14.00	BREAK	All Auditor
14.00 – 15.00	Public consultation with gender committee, labor union and local contractor	RGR
14.00 – 17.00	Document Review	All Auditor
Thursday, 23 May 2019		

08.00 – 12.00	Public consultation with previous land owner (if any) and local communities surrounding the plantation area	APP
08.00 – 12.00	Field Observation BUKIT TIGA ESTATE <ul style="list-style-type: none"> Best agricultural practices (manuring, spraying, harvesting, EFB application etc) Worker Welfare (payments, complaint mechanism) Hazardous Waste Material (B3) management; Worker facilities (housing, health clinic, clean water, etc), Land fill, Fire fighting facilities , Storage, ect. Legal operational and Conservation Area 	AMR/RGR AMR/RGR STV APP
12.00 – 14.00	BREAK	All Auditor
14.00 – 15.00	Public consultation with gender committee, labor union and local contractor	RGR
14.00 – 17.00	Document Review	All Auditor
Friday, 24 May 2019		
08.00 – 12.00	Document Review	All Auditor
12.00 – 14.00	BREAK	All Auditor
14.00 – 15.00	Closing meeting preparation	All Auditor
15.00 – 17.00	Closing meeting	All Auditor
Saturday, 25 May 2019		
06.00 – 08.00	Site → SAMPIT	All Auditor
09.45 – 11.30	SAMPIT → JAKARTA (IN-173)	All Auditor