

***Roundtable on Sustainable Palm Oil Certification  
RSPO*****[✓] Surveillance**

Name of Management : Tanjung Kembiri Palm Oil Mill, PT Forestalestari Dwikarya, a subsidiary of  
Organisation Golden Agri resources, Ltd.  
Plantation Name : PT Forestalestari Dwikarya: Tanjung Kembiri Estate and Tanjung Rusa Estate  
Location : Kembiri Village, Membalong Sub-District, Belitung District, Bangka Belitung  
Province, Indonesia  
Certificate Code : **MUTU-RSPO/037**  
Date of Initial Registration : 21 April 2014  
Date of Last Issued : 05 April 2019 Date of License Issue : 21 April 2020  
Date of Certificate Expiry : 20 April 2024 Date of License Expiry : 20 April 2021

Assessment	Assessment Date	PT Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-1.1	10 to 14 February 2020	Arif Faisal Simatupang (Lead Auditor), Mohamad Amarullah, Bayu Yogatama and Rindu Galih Rezza Rachmansyah	Ardiansyah	Octo HPN Nainggolan

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-1.1	13 March 2020

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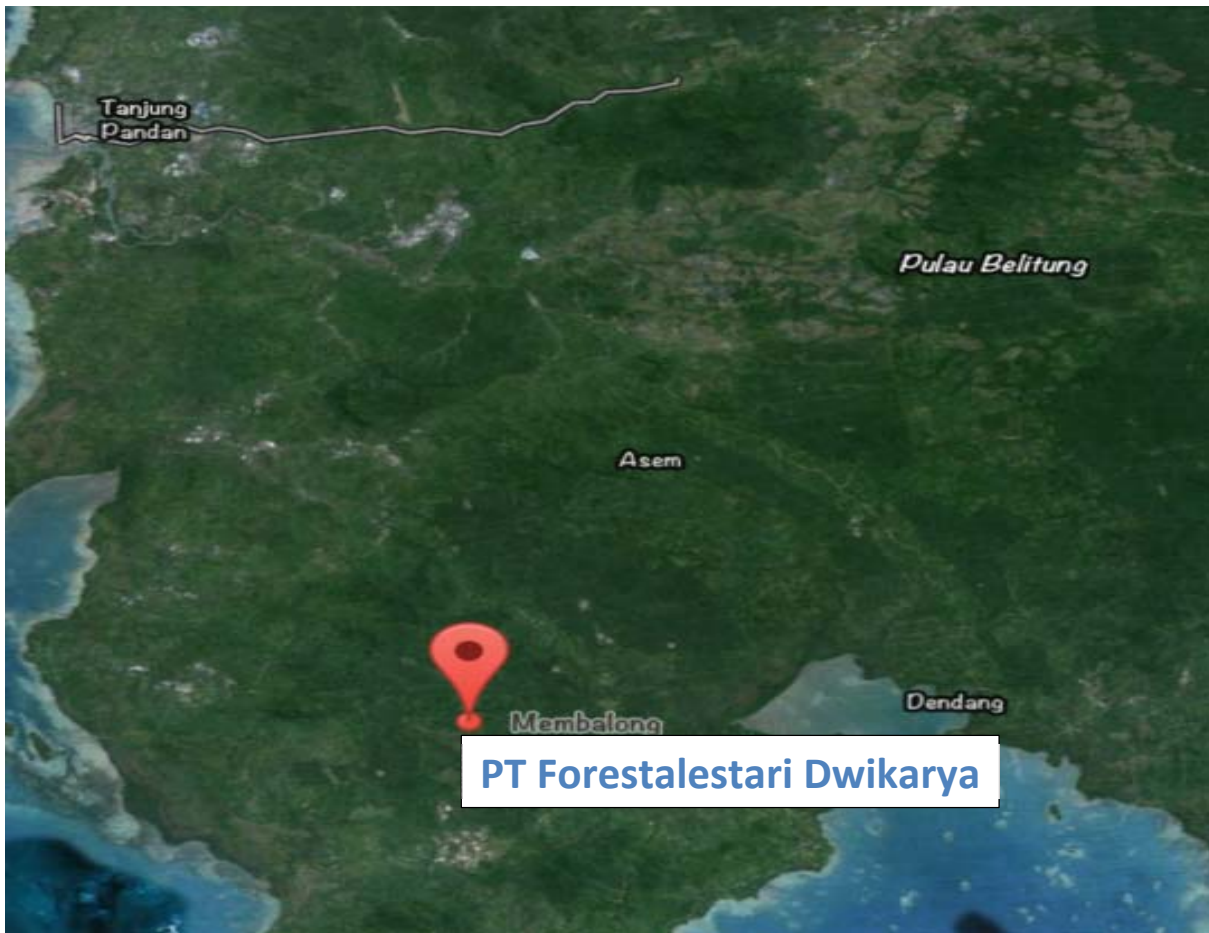
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Figure 1. Location Map of PT Forestalestari Dwikarya



**PETA SITUASI  
JALUR FASILITAS DESA, KEBUN TKME DAN TRSE  
PERKEBUNAN SINAR MAS II  
REGION BANGKA BELITUNG  
PT. FORESTA LESTARI DIKARYA  
Kabupaten Belitung  
Provinsi Bangka Belitung**

Scale 1 : 100.000  
Proyeksi : Mercator  
Sistem Grid : Geographic  
Datum : WGS 84

**LEGENDA :**

Desa/Kota	Dekolah
Pusat Kelapa Sawit	GPBU
Kantor Besar Estate	Jalan
Kantor Desa/Camat	Sungai
Kantor Besar Bunking	Batas Kebun TRSE
Lapangan	Batas Kebun TKME
Masjid	Batas Divisi
Puskesmas	Emplacement

**Petunjuk Lokasi**

The map shows the following locations and features:

- Divisi I** to **Divisi VIII** (Administrative Divisions)
- SDN-22 Membalong**, **SDN-22 Air Nangka**, **SDN-25 Membalong Dusun Air Gede**, **SDN-190 Membalong Dusun Kembar** (Village Administrative Units)
- Kantor Desa Cimpang Rusa**, **Kantor Desa Cimpang Rusa 2**, **Kantor Desa Perpat** (Village Offices)
- Puskesmas Cimpang Rusa**, **Puskesmas Cimpang Rusa 2** (Health Centers)
- Masjid Dusun Air Nangka**, **Masjid Dusun Air Gede**, **Masjid Al-Falah, Dusun Kembar** (Mosques)
- Kantor Besar TKME**, **Kantor Besar TRSE**, **Kantor Oka Kembar** (Plantation Offices)
- SDN-01 Membalong**, **SDN-02 Membalong** (Village Administrative Units)
- SMAN 1 Membalong** (Senior High School)
- Kampung Lela** (Village)
- Waduk Perpat** (Reservoir)
- Simpang Tiga Arah Bunking (BLTB)** (Three-way Intersection)
- Emplacement** (Plantation Blocks)

**Inset Map:** Shows the location of the plantation area within the Indonesian archipelago, specifically in the Bangka Belitung region.

**Abbreviations Used**

ASA	: Annual Surveillance Assessment
BPJS	: <i>Badan Penyelenggara Jaminan Sosial</i> / Social Security Agency
CPO	: Crude Palm Oil
CSPK	: Certified Sustainable Palm Kernel
CSPO	: Certified Sustainable Palm Oil
CSR	: Company Social Responsibility
EIA	: Environment Impact Assessment
EFB	: Empty Fruit Bunch
FFB	: Fresh Fruit Bunch
FLD	: Forestalestari Dwikarya
FPIC	: Free, Prior, Informed, Consent
FR	: Frequency Rate
GHG	: Green house gases
GPS	: Global Positioning System
HCS	: High Carbon Stock
HCV	: High Conservation Value
HGU	: <i>Hak Guna Usaha</i> (Land Use Title)
IPM	: Integrated Pest Management
KTU	: Kepala Tata Usaha
KER	: Kernel Extraction Rate
LSU	: Leaf Sampling Unit
MSDS	: Material Safety Data Sheet
NJOP	: <i>Nilai Jual Objek Pajak</i>
OER	: Oil Extraction Rate
OFI	: Opportunity For Improvement
OIA	: Operational Internal Audit
OHS	: Occupational Health and Safety
P2K3	: <i>Panitia Pembina Keselamatan dan Kesehatan Kerja</i> OHS Committee
P3SLH	: <i>Pos Pengaduan dan Penyelesaian Sengketa Lingkungan Hidup</i>
PCDV	: <i>Sustainability Policy and Compliance Division</i>
PK	: Palm Kernel
PMNP	: Plantation Monitoring and Planning
POME	: Palm Oil Mill Effluent
PPE	: Personal Protective Equipment
RC	: Recertification
RKL	: <i>Rencana Kelola Lingkungan</i>
RPL	: <i>Rencana Pemantauan Lingkungan</i>
RSPO	: Roundtable on Sustainable Palm Oil
RTE	: Rare, Threatened, Endangered
TKME	: Tanjung Kembiri Estate
TKMM	: Tanjung Kembiri Mill
TRSE	: Tanjung Rusa Estate
SMARTRI	: Sinar Mas Agro Resources and Technology Research Institute
SMD	: Senior Managing Director
SCCS	: Supply Chain Certification System
SOP	: Standard Operating Procedure
SR	: Severity Rate
SSU	: Soil Sampling Unit
VPA	: Vice President Agronomy
VPM	: Vice President Mill

WTP	:	Water Treatment Plant
WWTP	:	Waste Water Treatment Plant

1.0	SCOPE of the CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used	<ul style="list-style-type: none"><li>Principles and Criteria for the Production of Sustainable Palm Oil 2018, endorsed by the RSPO Board of Governors and adopted at the 15<sup>th</sup> Annual General Assembly by RSPO Member on 15 November 2018.</li><li>RSPO Certification System for Principles and Criteria, 14 June 2017</li></ul>	
1.2	Organisation Information		
1.2.1	Organisation name listed in the certificate	PT Forestalestari Dwikarya subsidiary of Golden Agri Resources Ltd	
1.2.2	Contact person	Yahya Mustakim	
1.2.3	Organisation address and site address	RSPO registered company: 108 Pasir Panjang Road, #06-00 Golden Agri Plaza, Singapore 118535  Liaison Office: Sinar Mas Land Plaza, Tower II, 30th Floor Jl. MH Thamrin No. 51, Jakarta 10350, Indonesia	
1.2.4	Telephone	(+62-21) 318 1388	
1.2.5	Fax	(+62-21) 318 1389	
1.2.6	E-mail	<a href="mailto:yahya.mustakim@sinarmas-agri.com">yahya.mustakim@sinarmas-agri.com</a>	
1.2.7	Web page address	<a href="http://www.goldenagri.com.sg">http://www.goldenagri.com.sg</a>	
1.2.8	Management Representative who completed the application for certification	Yahya Mustakim (Head of SPO Certification & Low GHG Emissions Strategy)	
1.2.9	Registered as RSPO member	1-0096-11-000-00, 30 January 2005	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Palm Oil Mill and supply base Tanjung Kembiri Mill, Tanjung Rusa Estate and Tanjung Kembiri Estate	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			LatitudeLongitude
	Tanjung Kembiri Mill (TKMM)	Kembiri Village, Membalong Sub District, Belitung District, Bangka Belitung Province, Indonesia	S 03° 01' 52"E 107° 46' 18"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			LatitudeLongitude
	Tanjung Kembiri Estate (TKME)	Kembiri Village, Membalong Sub District, Belitung District, Bangka Belitung Province, Indonesia	S 03 00' 54"E 107° 46' 08"
	Tanjung Rusa Estate (TRSE)	Kembiri Village, Membalong Sub District, Belitung District, Bangka Belitung Province, Indonesia	S 03° 02' 38"E 107° 45' 15"

1.5	Description of Area Statement						
1.5.1	Tenure						
	• State		11,337.58 ha				
	• Community		- ha				
1.5.2	Area Statement						
	• Total area		11,337.58 ha				
	• Mature area		10,484.67 ha				
	• Immature area		- ha				
	• Mill and housing complex		86.77 ha				
	• Infrastructure (roads, bridges and drains)		366.80 ha				
	• Occupation, enclave, steep slopes, stony, query, etc.		185.34 ha				
	• River, stream and swamps (wet land)		44.38 ha				
	• Reserve areas		169.62 ha				
	• HCV*		(466.13) ha				
	Note: *Refer to HCV identification, some HCV area overlap with planted area. for example, riparian zone that planted will not replant and managed as a HCV area (no chemical activity)						
1.6	Planting Year and Cycles						
1.6.1	Age profile of planting year						
	Planting Year	Hectarage (ha)					
		Tanjung Kembiri Estate	Tanjung Rusa Estate	Total			
	1995	1,726.48	-	1,726.48			
	1996	2,080.89	1,203.24	3,284.13			
	1997	1,878.19	3,157.15	5,035.34			
	1998	153.55	285.17	438.72			
	Sub Total Mature	5,839.11	4,645.56	10,484.67			
	TOTAL	5,839.11	4,645.56	10,484.67			
	1.6.2	New Planting area after January 2010		- ha			
1.6.3	Planting Cycle		1 <sup>st</sup> Cycle				
1.7	Description of Mill and Supply Base						
1.7.1	Description of Mill						
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel	
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)
	Tanjung Kembiri Mill (TKMM)	60	322,235.13	66,012.24	20.49	20,675.09	6.46
	*Production data source from February 2019 to January 2020						
1.7.2	Description of Certification Scope of Supply Base						
	Name of Estate	Total Area (ha)	Planted Area (ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)	Supplied to Mill	
						FFB (tonnes/year)	%
	Tanjung Kembiri Estate	6,086.30	5,839.11	130,065.29	22.27	130,065.29	100



	(TKME)					
	Tanjung Rusa Estate (TRSE)	5,251.28	4,645.56	103,085.35	22.19	103,085.35 100
	<b>TOTAL</b>	<b>11,337.58</b>	<b>10,484.67</b>	<b>233,150.64</b>	<b>22.24</b>	<b>233,150.64 100</b>
	<i>*Production data source from February 2019 to January 2020</i>					
1.7.3	FFB description from other source					
	<b>Name of Sources/Organisation</b>	<b>Type of Organisation</b>	<b>Number of Smallholders</b>	<b>Production Area (ha)</b>	<b>Supplied to Mill FFB (tonnes/year)</b>	
	Tanjung Rusa Estate (Non RSPO Certified)	PT Forestalestari Dwikarya (Associated grower)	-	55.05	4,532.44	
	Tanjung Rusa Plasma (TRSA) (Non RSPO Certified)	PT Forestalestari Dwikarya (Associated smallholder)	382	496.99	12,193.95	
	Tanjung Sawit Estate (TSWE) (Non RSPO Certified)	PT Palmindo Billiton Berjaya (Subsidiary GAR)	-	2,665.00	50,709.52	
	Tanjung Sawit KKPA (TSWA) (Non RSPO Certified)	PT Palmindo Billiton Berjaya (Subsidiary GAR)	-	681.00	16,532.40	
	• KKPA Melantang Makmur Sejahtera (MMKA) (Non RSPO Certified)	PT Palmindo Billiton Berjaya (Subsidiary GAR)				
	• KKPA Mitra Mandiri (MMNA) (Non RSPO Certified)	PT Palmindo Billiton Berjaya (Subsidiary GAR)				
	• KKPA Lingkar Mitra (LMTA) (Non RSPO Certified)	PT Palmindo Billiton Berjaya (Subsidiary GAR)				
	• KKPA Tunas Harapan (THRA) (Non RSPO Certified)	PT Palmindo Billiton Berjaya (Subsidiary GAR)				
	• KKPA Gang Rumpun Jaya (GRMA) (Non RSPO Certified)	PT Palmindo Billiton Berjaya (Subsidiary GAR)				
	• KKPA Mitra Sejahtera (MTSA) (Non RSPO Certified)	PT Palmindo Billiton Berjaya (Subsidiary GAR)				
	Sawit Alam Permai (SAPX) (Non RSPO Certified)	PT Sawit Alam Permai (Independent outgrower)	-	-	5,116.18	
	<b>TOTAL</b>					<b>89,084.49</b>
	<i>*Production data source from February 2019 to January 2020</i>					
	<i>For Tanjung Sawit KKPA there is no number smallholders because this unit under village</i>					
1.7.4	Product categories			FFB, CPO, PK		
<b>1.8</b>	<b>Tonnage of Product</b>					
1.8.1	Past Annual Claim Certified Product	Last Year Projected Certified Volume (mt) (21 Apr 2019 to 20 Apr 2020)		Last Year Actual Certified Volume (mt) (Feb 2019 to Jan 2020)		
	FFB Processed	265,000		233,150.64		
	CPO Production	55,650		47,796.44		
	Palm Kernel (PK) Production	15,900		15,194.69		
1.8.2	Product selling					
	Type of selling product	Actual selling product for last year (Feb 2019 to Jan 2020) (mt)				
	CSPO sold as RSPO certified product	0				

	CSPK sold as RSPO certified product				14,734.75					
	CSPO sold under other scheme (ISCC)				43,941.12					
	CSPK sold under other scheme				0					
	CSPO sold as conventional				0					
	CSPK sold as conventional				0					
1.8.3	Estimate of Certified FFB Claim									
	Name of Estates		Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)				
	Tanjung Kembiri Estate (TKME)		6,086.30	5,839.11	139,200	23,83				
	Tanjung Rusa Estate (TRSE)		5,251.28	4,645.56	110,300	23,74				
	TOTAL		11,337.58	10,484.67	249,500	23,80				
	*Projected FFB production for 21 April 2020 to 20 April 2021									
1.8.4	Estimate of Certified Palm Product Claim									
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO Out put (tonnes)		Extraction (%)	Palm Kernel Out put (tonnes)		Extraction (%)	Supply Chain Module
	Tanjung Kembiri Mill	60	249,500	52,400	21.00	15,200	6.00	MB		
	*Projected CSPO and CSPK production for 21 April 2020 to 20 April 2021									
1.9	Other Certifications									
	ISO 9001:2008			-						
	ISO 14001: 2004			-						
	OHSAS 18001:2007			-						
	ISCC			EU-ISCC-Cert-ID218-20180116 (18 Dec 2019 – 17 Dec 2020)						
	ISPO			MUTU-ISPO/041 issued by PT Mutuagung Lestari 11 December 2015 to 10 December 2020						
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 Sejahtera)	2013	Sawit Mas Estate	2013	Sumatera Selatan Province	Certified				
			Sawit Mas Estate (HGU on progress)	2022		-				
	Bumi Sawit Mill (PT Bumi Sawit Permai)	2013	Bumi Sawit Estate	2013	Sumatera Selatan Province	Certified				
			Bumi Sawit Estate (HGU on progress)	2022		-				
	Muara Kandis Mill (PT Djuanda Sawit Lestari)	2013	Muara Tawas Estate	2013	Sumatera Selatan Province	Certified				
			Muara Kandis Estate	2013		Certified				
			Muara Kandis Estate (HGU on progress – 418.49 Ha)	2022		-				
			Muara Tawas	2022		-				

		Estate (HGU on progress – 57.7 Ha) Smallholder (KKPA Pandawa)	2021		-
Sungai Rungau Mill (PT Sumber Indah Perkasa)	2013	Sungai Rungau Estate	2013	Kalimantan Tengah Province	Certified
		Sungai Seruyan Estate	2013		Certified
		Terawan Estate	2013		Certified
		Tangar Estate	2013		Certified
		Bukit Tiga Estate	2013		Certified
Bukit Perak Mill (PT Bumi Permai Lestari)	2013	Bukit Perak Estate	2013	Bangka Belitung Province	Certified
		Bukit Permata Estate	2013		Certified
		Bukit Lestari Estate (PT Bumi Bangka Lestari)	2023		-
		Bukit Permai Estate (PT Bumi Permai Surya Lestari)	2023		-
Tanjung Kembiri Mill (PT Forestalestari Dwikarya)	2013	Tanjung Kembiri Estate	2013	Bangka Belitung Province	Certified
		Tanjung Rusa Estate	2013		Certified
		Tanjung Rusa Estate (HGU on process 48.81 Ha)	2022		-
		Tanjung Sawit Estate (PT Palmindo Billiton Berjaya)	2023		-
		Tanjung Sawit Plasma (PT Palmindo Billiton Berjaya)	2023		-
		Tanjung Rusa KKPA	2021		-
Sungai Buaya Mill (PT Sumber Indah Perkasa)	2014	Sungai Buaya Estate	2014	Lampung Province	Certified
		Sungai Buaya Estate (HGU on process)	2022		-
		Smallholder (KKPA Gedung Aji Lama)	2014		Certified
		Smallholder (KKPA Mesuji)	2014		Certified
Sungai Merah Mill (PT Sumber Indah Perkasa)	2014	Sungai Merah Estate (HGU on process)	2014	Lampung Province	Certified
		Sungai Merah Estate	2022		-
		Smallholder (KKPA Gedung Aji Baru)	2014		Certified

Kasuari Mill (PT Sinar Kencana Inti Perkasa)	2021	Cendrawasih Estate	2021	Papua Province	ST-1
		Nuri Estate	2021		ST-1
		Rajawali Estate	2021		ST-1
		Mambruk Estate (PT Sumber Indah Perkasa)	2021		ST-1
Pekawai Mill (PT Agrolestari Mandiri)	2020	Kayung Estate	2020	Kalimantan Barat Province	ST-1
		Pekawai Estate	2020		ST-1
		Sungai Kelik Estate	2020		ST-1
		Nanga Tayap Estate	2020		ST-1
		Smallholder (Kayung Plasma)	2022		ST-1
Kenanga Mill (PT Kencana Graha Permai)	2014	Kencana Estate	2015	Kalimantan Barat Province	Certified
		Cendana Estate	2015		Certified
		Kenanga Estate (PT Cahaya Nusa Gemilang)	2018		Certified
		Delima Estate (PT Kencana Graha Permai)	2020		-
		Smallholder (Kencana Plasma)	2022		-
		Smallholder (Kenanga Plasma)	2022		-
Perdana Mill (PT Binasawit Abadi Pratama)	2023	Perdana Estate	2023	Kalimantan Tengah Province	ST-1
		Lenggana Estate	2023		ST-1
		Semandau Estate	2023		ST-1
		Muara Dua Estate	2023		ST-1
Kuayan Mill (PT Agrokarya Prima Lestari)	2023	Bukit Santuhai Estate	2023	Kalimantan Tengah Province	ST-1
		Tajur Beras Estate	2023		ST-1
		Seranau Estate	2023		ST-1
		Sungai Sambon Estate	2023		ST-1
		Sungai Sambon Plasma	2023		-
		Sapiri Estate (PT Buana Adhitama)	2023		ST-1
		Sapiri Plasma	2023		-
		Bukit Dua Estate (PT Buana Adhitama)	2023		-
		Bukit Tunggal Estate (PT Buana Adhitama)	2023		-
Belian Mill (PT Paramitra Internusa Pratama)	2020	Belian Estate	2020	Kalimantan Barat Province	ST-1
		Tengkawang Estate	2020		ST-1
		Muara Tawang	2020		ST-1

		Estate (PT Kartika Prima Cipta)			
		Kapuas Hulu Estate (PT Persada Graha Mandiri)	2020		ST-1
		Sungai Beran Estate (PT Persada Graha Mandiri)	2020		ST-1
		Smallholder (Belian KKPA)	2021		-
		Smallholder (Muara Tawang KKPA)	2021		-
		Smallholders (Kapuas Hulu KKPA)	2021		-
Sungai Kupang Mill (PT Sinar Kencana Inti Perkasa)	2020	Sungai Kupang Estate	2020	Kalimantan Selatan Province	IC
		Sungai Kupang KKPA	2022		-
Sungai Kikim Mill (PT Sawit Mas Sejahtera)	2021	Sungai Kikim Estate	2021	Sumatera Selatan Province	-
		Sungai Pangi Estate	2021		-
		Sungai Musi Estate	2021		-
		Sungai Saling Estate	2021		-
		Sungai Enim Estate (PT Bumi Sawit Permai)	2021		-
		Sungai Lematang Estate (PT Bumi Sawit Permai)	2021		-
		Sungai Bungur Estate (PT Prima Cipta Mandiri)	2021		-
		Sungai Lingsing Estate (PT Prima Cipta Mandiri)	2021		-
Tangar Mill (PT Mitra Karya Agroindo)	2023	Sulin Estate	2023	Kalimantan Tengah Province	-
		Sulin Plasma	2023		-
		Nahiyang Estate	2023		-
		Katayang Estate	2023		-
		Sungai Nusa Estate	2023		-
		Sungai Ayawan Estate (PT Aditunggal Mahajaya)	2023		-
Sungai Magalau Mill (PT Sinar Kencana Inti Perkasa)	2021	Sungai Magalau Estate	2021	Kalimantan Selatan Province	-
		Senakin Estate	2021		-
Jalemo Mill (PT Agro Lestari Sentosa)	2023	Balasang Estate	2023	Kalimantan Tengah Province	-
		Jalemo Estate	2023		-
		Kajui Estate (PT	2023		-

		Agro Lestari Sentosa)			
		Manuhing Estate (PT Agro Lestari Sentosa)	2023		-
Sako Mill (PT Adi Tunggal Mahajaya)	2023	Mentaya Estate	2023	Kalimantan Tengah Province	ST-1
		Kuayan Estate	2023		ST-1
		Sako Plasma	2023		-
Padang Halaban Mill (PT SMART Tbk)	2011	Padang Halaban Estate	2011	Sumatera Utara Province	Certified
		Penantian Estate	2011		Certified
		Adipati Estate	2011		Certified
		Kanopan Ulu Estate	2011		Certified
Batu Ampar Mill (PT SMART Tbk)	2012	Batu Ampar Estate	2012	Kalimantan Selatan Province	Certified
		Batu Mulia Estate	2012		Certified
		Sungai Panci Estate	2012		Certified
		Sungai Panci KKPA	2012		Certified
Tanah Laut Mill (PT SMART Tbk)	2012	Tanah Laut Estate	2012	Kalimantan Selatan Province	Certified
		Kinta Pura Estate	2012		Certified
Langga Payung Mill (PT Tapian Nadenggan)	2012	Langga Payung Estate	2012	Sumatera Utara Province	Certified
		Paya Baung Estate	2012		Certified
		Normark Estate	2012		Certified
Hanau Mill (PT Tapian Nadenggan)	2012	Hanau Estate	2012	Kalimantan Tengah Province	Certified
		Tasik Mas Estate	2012		Certified
		Tanjung Paring Estate	2012		Certified
		Langadang Estate	2012		Certified
		Medang Sari Estate (PT Satya Kisma Usaha)	2022		-
Semilar Mill (PT Tapian Nadenggan)	2013	Semilar Estate	2013	Kalimantan Tengah Province	Certified
		Sei Rindu Estate	2013		Certified
		Mandang Estate	2013		Certified
		Puri Estate	2013		Certified
Jak Luay Mill (PT Tapian Nadenggan)	2015	Pantun Mas Estate	2015	Kalimantan Timur Province	Certified
		Jak Luay Estate	2015		Certified
		Jak Luay KKPA	2022		-
		Long Buluh Estate	2015		Certified
		Bukit Subur Estate	2015		Certified
		Bukit Subur KKPA	2022		-
Leidong West Mill (PT MP Leidong West Indonesia)	2014	Leidong West Utara Estate	2014	Bangka Belitung Province	Certified
		Leidong West Selatan Estate	2014		Certified
Muara Wahau Mill (PT Kresna Duta Agroindo)	2014	Muara Wahau Estate	2014	Kalimantan Timur Province	Certified
		Gunung Kombeng	2014		Certified
Gunung Kombeng Mill (PT Kresna Duta Agroindo)	2021	Gunung Kombeng KKPA	2021	Kalimantan Timur Province	-

Rantau Panjang (PT Kresna Duta Agroindo)	2022	Rantau Panjang Estate	2022	Kalimantan Timur Province	-
		Rantau Panjang KKPA	2022		-
Jelatang Mill (PT Kresna Duta Agroindo)	2014	Bangko Estate	2014	Jambi Province	Certified
Pelakar Mill (PT Kresna Duta Agroindo)	2020	Pelakar Estate	2020	Jambi Province	IC
		Batang Merangin Estate	2020		IC
		Tiga Serumpun KKPA	2022		-
Langling Mill (PT Kresna Duta Agroindo)	2014	Bangko Estate	2014	Jambi Province	Certified
		Batang Gading Estate	2021		-
		Batang Gading KKPA (PT Satya Kisma Usaha)	2022		-
Sungai Bengkal Mill (PT Satya Kisma Usaha)	2015	Sungai Bengkal Estate	2015	Jambi Province	Certified
		Sungai Bengkal KKPA	2015		Certified
		Muara Kilis Estate	2015		Certified
		Muara Kilis KKPA	2022		-
Bukit Kapur Mill (PT SMART Tbk)	2022	Bukit Kapur Estate	2022	Kalimantan Selatan Province	ST-1
		Sungai Cantung Estate	2022		ST-1
Samsam Mill (PT Ivomas Tunggal)	2009	Samsam Estate	2009	Riau Province	Certified
		Samsam Estate (HGU on progress – 29.09 Ha)	2022		-
		Kandista Estate	2009		Certified
		Kandista Estate (HGU on progress – 158.46 Ha)	2022		-
		Palapa Estate	2009		Certified
Libo Mill (PT Ivomas Tunggal)	2009	Libo Estate	2009	Riau Province	Certified
		Nenggala Estate	2009		Certified
		Nenggala Estate (HGU on progress 419.9 Ha)	2022		-
		Sei Rokan Estate	2009		Certified
		Sei Rokan Estate (HGU on progress – 102.7 Ha)	2022		-
Ujung Tanjung (PT Ivomas Tunggal)	2009	Ujung Tanjung Estate	2009	Riau Province	Certified
		Ujung Tanjung Estate (HGU on progress – 557.3 Ha)	2022		-
Naga Sakti Mill (PT Buana Wiralestari Mas)	2010	Naga Mas Estate	2010	Riau Province	Certified
		Naga Mas Estate (HGU on process –	2022		-

		253.39 Ha)			
		Naga Sakti Estate	2010		Certified
		Naga Sakti Estate (HGU on process – 59.79 Ha)	2022		-
		Rama Bakti Estate	2010		Certified
Kijang Mill (PT Buana Wiralestari Mas)	2010	Kijang Mas Estate	2010	Riau Province	Certified
		Kijang Mas Estate (HGU on process – 56.07 Ha)	2022		-
		Kijang Kencana Plasma	2010		Certified
Ramarama Mill (PT Ramajaya Pramukti)	2010	Ramarama Estate	2010	Riau Province	Certified
		Ramarama Estate (HGU on process – 318.76 Ha)	2022		-
		Amartajaya Plasma	2010		Certified
		Smallholder (Ramarama KKPA)	2021		-
Indrasakti Mill (PT Meganusa Inti Sawit)	2011	Indralestari Estate	2011	Riau Province	Certified
		Indrasakti Estate	2011		Certified
		Indragiri Plasma	2011		Certified
		Indrasakti Plasma	2011		Certified
Bumipalma Mill (PT Bumipalma Lestari Persada)	2012	Bumi Lestari Estate	2012	Riau Province	Certified
		Bumi Palma Estate	2012		Certified
		Bumi Sentosa Estate	2012		Certified
		Bumi Palma Estate (HGU on process – 39.21 Ha)	2022		-
Sawita Mill (PT Sawitakarya Manunggal)	2021	Sawita Estate	2021	Kalimantan Selatan Province	ST-1
		Pamukan Estate	2021		ST-1
		Sawita KKPA	2021		ST-1
Kenari Mill (PT Bangun Nusa Mandiri)	2023	Gaharu Estate (PT Bangun Nusa Mandiri)	2023	Kalimantan Barat Province	-
		Kenari Estate (PT Bangun Nusa Mandiri)	2023		ST-1
		KerANJI Estate (PT Bangun Nusa Mandiri)	2023		ST-1
		Smallholder (Gaharu Plasma)	2023	Kalimantan Barat Province	-
		Smallholder (Kenari Plasma)	2023		-
Sungai Air Jernih Mill (PT Bahana Karya Semesta)	2022	Sungai Air Jernih Estate	2022	Jambi Province	-
		Sungai Mentawak Estate	2022		-
		Sungai Merak Estate	2022		-



		Sungai Badak Estate	2022		-
	<p>There is revision of time bound plan on 02 January 2020 made by Head of Sustainability Policy &amp; Compliance. There are 14 mills which postpone and 2 new mills. There are justification for mills that postpone, with explanation:</p> <ul style="list-style-type: none"> <li>- Kasuari Mill and supply bases still in process of EIA (AMDAL) revision and permit for hazardous waste warehouse.</li> <li>- Perdana Mill and supply bases are still in process for HGU and RaCP (LUCA review).</li> <li>- Kuayan Mill and supply bases are still in process for HGU and RaCP (LUCA review).</li> <li>- Tangar Mill and supply bases are still in process for HGU and RaCP (LUCA review).</li> <li>- Sungai Kikim Mill and supply bases are still in process of EIA (AMDAL) revision.</li> <li>- Sungai Magalau Mill and supply bases are still in process for RaCP (LUCA review).</li> <li>- Jalemo Mill and supply bases are still in process for HGU and RaCP (LUCA review).</li> <li>- Sako Mill and supply bases are still in process for HGU and RaCP (LUCA review).</li> <li>- Bukit Kapur Mill and supply bases are still in process for HGU and RaCP (LUCA review).</li> <li>- Rantau Panjang Mill and supply bases are still in process for RaCP (LUCA review).</li> <li>- Sawita Mill and supply bases are still in process for RaCP (LUCA review).</li> <li>- Gunung Kombeng Mill and supply bases are still in process for land rights.</li> <li>- Kenari Mill and supply bases are still in process for HGU.</li> </ul> <p>There are some companies that are not fully certified, due to some area still on process to get land title (HGU), consist of:</p> <ol style="list-style-type: none"> <li>1. PT Ivomas Tunggal (Samsam Estate, Kandista Estate, Nenggala Estate, Sei Rokan Estate, Ujung Tanjung Estate);</li> <li>2. PT Rama Jaya Pramukti (Ramarama Estate);</li> <li>3. PT Buana Wira Lestari (Nagasakti Estate; Nagamas Estate and Kijang Estate);</li> <li>4. PT Forestalestari Dwikarya (Tanjung Rusa Estate);</li> <li>5. PT Djuanda Sawit Lestari (Muara Kandis Estate &amp; Muara Tawas Estate).</li> <li>6. PT Sumber Indah Perkasa (Sungai Merah Estate and Sungai Buaya Estate).</li> </ol>				
<b>1.10.2</b>	<b>Progress of Associated Smallholders and Outgrowers for Certifiable Standard</b>				
	Smallholder under PT FLD are full managed by the company and planned to be certified on 2021.				

<b>2.0</b>	<b>ASSESSMENT PROCESS</b>
<b>2.1</b>	<b>Assessment Team</b>
	<p><b>1. Arif Faisal Simatupang (Lead Auditor)</b> Bachelor of Agriculture, from Department of Agriculture Agronomy, Faculty of Agriculture, University of Gadjah Mada. He has successfully completed an RSPO endorsed P&amp;C Lead Auditor Training, RSPO SCCS endorsed Lead Auditor Training, Indonesian Sustainable Palm Oil (ISPO) Lead Auditor Training, Management System Certification ISO 9001-2008 Lead Auditor Training, Environmental Management System ISO 14001 Lead Auditor Training, ISO 17021 and ISO 17065 Awareness Training, Management of High Conservation Value (HCV) Training, Social Accountability SA 8000 Training. He has four years of working experience as a Field Assistant on oil palm plantation company in Indonesia. Since 2014, he works as an auditor of RSPO and ISPO in the aspects of legal, social, best management practices of mill and estate, OHS, employment, and environmental. In this audit, he was assessing the aspects of best management practices of agronomy and processing. During this assessment he verified environment, conservation and GHG aspect and supply chain aspect.</p> <p><b>2. Mohamad Amarullah (Auditor).</b> Indonesian Citizen. Master of Wood Science and Technology and Bachelor of Forestry with major in Forest Product Technology. Has experiences as Agronomist and Research Assistant in Indonesia and Malaysia from 2008 to 2014. Has attended several trainings such as Lead Auditor of ISPO, RSPO, RSPO Supply Chain, ISO 17021, ISO 17065, ISO 9001, ISO 19001, ISO 14001, SA 8000, HCV, etc. very good in conducting RSPO, MSPO and ISPO audit scheme since 2014 on any aspect. Fluent in Malay and English. During this assessment has verified legality, land and business permit, and social aspect.</p> <p><b>3. Bayu Yogatama (Auditor)</b> Bachelor of Forestry, Department of Forest Resources Conservation and Ecotourism, Bogor Agricultural University. Has attended the ISO 9001: 2015 Quality Auditor / Lead Auditor Course Quality Management System (QMS) course and ISO 19011: 2011 Guidelines for Auditing Management System, ISPO Lead Training, SA 8000, RSPO Lead Training, IHT RSPO NPP, IHT RSPO RaCP, IHT ISO 17021, and IHT ISO 17065. Having experience working in plywood field as Inspector in foreign private company. Currently working for an independent certification body. During this assessment has verified environment, conservation and GHG aspect. During this assessment has verified BMP, long term management plan and transparency aspect.</p> <p><b>4. Rindu Galih Rezza Rachmansyah (Trainee Auditor).</b> Indonesian citizen, Bachelor of Agriculture with major in Plant Pest and Disease. Has one year experience as Field Expert in Pesticide Company and 3 years' experience in Industrial Forest Management, Forest Rehabilitation and Reclamation on Indonesia Stated Owned Company as Assistant. Training which had attended including Lead Auditor ISO 9001, ISO 14001, ISO 17021, ISO 19011, SA 8000, ISPO, RSPO, RaCP and NPP Awareness and OHSAS 18001:2007. Has involved in several audit activities related to sustainable palm oil since 2017. During assessment, he assigned to supporting verification towards safety, worker welfare and social aspect.</p>
<b>2.2</b>	<b>Assessment Methodology, Assessment Process and Locations of Assessment</b>
<b>2.2.1</b>	<b>Figure of person days to implement assessment</b>
	<p>Number of auditors: 3 auditors and 1 auditor trainee</p> <p>Number of days for <b>ASA-1.1</b> at site: 5 days</p> <p>Number of working days for <b>ASA-1.1</b> at site: 15 Working days</p>
<b>2.2.2</b>	<b>Assessment Process</b>
	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Forealestari Dwikarya to the requirements of Principles and Criteria for the Production of Sustainable Palm Oil 2018, endorsed by the RSPO Board of Governors and adopted at the 15<sup>th</sup> Annual General Assembly by RSPO Member on 15 November 2018 and RSPO Certification System for Principles and Criteria, 14 June 2017.</p> <p>From morning until 10.00 am, the team traveled from Jakarta to Belitung Island by plane and travel to site by car. After arriving on site, continued holding an opening meeting. The opening and closing meeting was held in Meeting room PT Forealestari Dwikarya Estate attended by the Regional Controller, Production Controller, Unit Head, Estate Manager, Mill Manager, Assistants, and other related personnel's. During audit activity, auditors always accompanied by certification holder and the documents are presented well.</p>

	<p>The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) <i>interview</i>, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site.</p> <p>Some opportunities for improvement of the results ASA-1.1 by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase ASA-1.2.</p> <p>Improvement of findings from resertification findings were observed by auditors at this ASA-1.1 assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA 1,1.</p> <p>The assessment program please find Appendix 2</p>
<b>2.2.3</b>	<b>Locations of Assessment</b>
	<p><b><u>Tanjung Kembiri Mill (TKMM) in 10 February 2020</u></b></p> <ul style="list-style-type: none"> <li>• <b>Hazardous Waste Storage.</b> Field observations related to the fulfillment of the attributes health and safety, recording, and the implementation of compliance requirements hazardous waste temporary storage, wages and complaint mechanism.</li> <li>• <b>Workshop.</b> Observations and interviews related to wages and overtime, waste management activities, OHS implementations and health inspections.</li> <li>• <b>Spare Part and Oil Storage.</b> Observation minimum stock of PPE's and housekeeping implementation.</li> <li>• <b>Chemical Storage.</b> Observation related to management of chemical material and waste, MSDS, emergency response facilities and the types of chemical used.</li> <li>• <b>Hydrant No. 04 Simulation.</b> Observation related emergency response, readiness of fire fighting equipment.</li> <li>• <b>Security Post.</b> Observation related to the acceptance of FFB and employment aspect of securities. .</li> <li>• <b>Grading Station.</b> Observations and interviews related to FFB quality, handling of FFB that did not pass the criteria, OHS and employment.</li> <li>• <b>FFB process stations (<i>sterilizer, thresher, digester, press, kernel</i>).</b> Observations and interviews related to best practices, OHS, license, and employment.</li> <li>• <b>Boiler.</b> Observations and interviews related to OHS, understanding of emergency response, and operator licenses</li> <li>• <b>Engine room.</b> Observations and interviews related best practices, OHS, and employment.</li> <li>• <b>CPO storage dan 18ubulate.</b> Observation related CPO storage and 18ubulate.</li> <li>• <b>Kernel Silo.</b> Observation related PK storage and 18ubulate.</li> <li>• <b>Weighbridge Station.</b> Observation and interview with 2 <b>Operators</b> (female), on their understanding towards technical (included SCCS-MB implementation), bridges calibration (2 units), software used, manpower, safety and environment aspects, as well as facilities provided by unit management. Software being used were Weighbridge Version 3.41 and eFact 2.0. The bridge endorsed by "UPT Metrologi Legal &amp; Pengelolaan Pasar" of Belitung Regency for period 2018 and 2019 as shows through sticker on Bridge Scale.</li> <li>• <b>WTP.</b> Observations and interviews related to water management, recording of water used, OHS, and waste management.</li> <li>• <b>WWTP.</b> Field observations and interview related POME management, recording, OHS and environmental.</li> <li>• <b>Empty Bunch Area.</b> Field observations related to empty bunch management and water effluent.</li> <li>• <b>Water Pump and water reservoir.</b> Field observation related to water management, OHS and environmental aspect.</li> </ul> <p><b><u>Tanjung Kembiri Estate (TKME) in 11 February 2020</u></b></p> <ul style="list-style-type: none"> <li>• <b>Housing Complex.</b> Observation and interview with residents related housing facilities, safety, and domestic waste management.</li> <li>• <b>Workshop.</b> Observations and interviews related employment, waste management, and OHS aspects.</li> <li>• <b>Oil and Agrochemicals Storage.</b> Observation related to management of oil and agrochemical material and waste, OHS and environmental.</li> <li>• <b>Sparepart Warehouse.</b> Field observations and interview related sparepart management, OHS, and environmental aspect.</li> <li>• <b>Hazardous Waste Temporary Warehouse.</b> Field observations and interview related hazardous waste management, OHS and environmental aspect.</li> <li>• <b>Fuel Oil and Lubricant Store.</b> Observation towards health, safety and environment aspect.</li> </ul>

- **Diesel Tank.** Observation towards health, safety and environment aspect.
- **Clinic.** Observation towards **infectious or medical waste management**, accident trend records, manpower, safety, environmental and facilities provided by unit management.
- **Fire Fighting Facilities.** Observation and simulation the emergencies response facilities.
- **HCV area of Air Mundur River Riparian, Block D40.** Observation the implementation of management in HCV of riparian area, and boundary marking.
- **Generator Set House.** Observation towards OHS, safety and environment aspect.
- **Menara Pantau Api, Block J48.** Observation of fire monitoring facilities.
- **Division 4 Block H45.** Observation to **Barn Owl Box (Gupon)**, **harvesting** activities and interview with Foreman, 1 Harvester and 1 Loose fruit Picker, on their understanding towards technical, manpower, safety, environment, conservation and facilities provided by unit management.
- **Division 6 Block K47.** Observation to  **Glyphosate application** on palm circle, harvesting path, and interview with Foreman, Pesticide Mixer Man and 2 Pesticide Applicators, on their understanding towards technical, manpower, safety, environment, conservation and facilities provided by unit management.
- **Division 6 Block K50.** Observation to **Land application** activities and interview with Foreman, on his understanding towards technical, manpower, safety, environment, conservation and facilities provided by unit management. Dosage applied was 125 m<sup>3</sup>/ha/rotation and there is 3 rounds of application annually.
- **Division 4 Block H51.** Observation on **EFB application** area which placed on inter-palm. Dosage applied was 30 ton/ha/year. EFB spread mechanically by Errepi since 2018.
- **Division 6 Block K46.** Observation to Boundary or **BPN Pole No. BT 95** where situated in adjacent with Dusun Air Gede of Kembiri Village, with condition likely covered by bushes and secondary forest. Coordinate marked through app. GPS Camera was 03° 01' 49" S and 107° 45' 56" E.
- **Division 6 Block K45.** Observation to Boundary or **BPN Pole No. FLD 66** where situated in adjacent with Dusun Air Gede of Kembiri Village, with condition likely bushes and secondary forest. Coordinate marked through app. GPS Camera was 03° 01' 49" S and 107° 45' 36" E.
- **Division 6 Block K44.** Observation to Boundary or **BPN Pole No. BT 63** where situated in adjacent with Dusun Air Gede of Kembiri Village, with condition locals pepper plantation surrounded by secondary forest. Coordinate marked through app. GPS Camera was 03° 01' 31" S and 107° 45' 27" E.
- **Division 7 Block L47.** Observation to **overlapped area** between PT FLD Land Title (HGU) and Personal Property Right (SHM) which covers about 0.38 ha, included boundary road area. Palms included in overlapped area has marked with red cross paint and there is no indication of harvesting activities and/or other agronomy input on the particular field.

#### **Tanjung Rusa Estate (TRSE) in 12 February 2020**

- **Harvesting at Block R11/12.** Observation and interviews with foreman and harvester related FFB quality, harvesting round, OHS, and employment.
- **Beneficial Plant Maintenance at Block P08/Q08.** Observation and interviews with workers related beneficial plant to support development of natural enemy for suppressing palm leaf eating caterpillar, plant maintenance, OHS, and employment.
- **Owl Nest at Block P11.** Observation of Integrated Pest Management, related to suppress rat infestation by installing and monitoring owl nest.
- **Spraying at Block K11.** Interviews of spraying mechanism, work tools, chemicals used, doses used, medical examinations, extra fooding, PPE, labor aspect and environment.
- **Hazardous Waste Storage.** Field observations related to the fulfillment of the attributes health and safety, recording, and the implementation of compliance requirements hazardous waste temporary storage, wages and complaint mechanism.
- **Spare Part and Oil Storage.** Observation minimum stock of PPE's and housekeeping implementation.
- **Chemical Storage.** Observation related to management of chemical material and waste, MSDS, emergency response facilities and the types of chemical used.
- **Fertilizer Storage.** Observation related to management of fertilizer material and waste, MSDS, emergency response facilities and the types of fertilizer used.
- **Solar Tank.** Observation of OHS, environment aspect, emergency response and fire facilities.

	<ul style="list-style-type: none"> <li>• <b>PPE Storage and Rinse House for Sprayer.</b> Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of pesticides used.</li> <li>• <b>Generator House.</b> Observation for waste management, and interviews related to workers facility, electricity, domestic waste, sources of fresh water, socialization of company policy and complaint mechanism.</li> <li>• <b>Housing Complex.</b> Observation and interview with residents about housing facilities, domestic waste management, and complaint mechanism.</li> <li>• <b>Child Daycare.</b> Observation and interview with residents about housing facilities, domestic waste management, and complaint mechanism.</li> <li>• <b>Division 1 Block K8.</b> Observation to <b>EFB application area, RSPO non-certified area</b> and boundary or <b>BPN Pole No. BT 13</b> where situated in adjacent with Dusun Air Gede of Kembiri Village, with condition surrounded abandoned area by secondary forest. Coordinate marked through app. GPS Camera was 03° 02' 36" S and 107° 44' 29" E. Dosage of EFB was 30 ton/ha/year.</li> <li>• <b>Division 2 Block Q7.</b> Observation to boundary or <b>BPN Pole No. 17</b> where situated in adjacent with Dusun Air Gede of Kembiri Village, with condition surrounded abandoned area (<i>Klekak</i>) and secondary forest. Coordinate marked through app. GPS Camera was 03° 05' 29" S and 107° 44' 13" E.</li> <li>• <b>Division 1 Block J06.</b> Observation to household in-organic wastes <b>landfill</b> with size 3x5x2 m<sup>3</sup> which digged-up in 17 January 2020. The distance is approximately more that 2 km from the nearest housing complex.</li> <li>• <b>Division 1 Block M10.</b> Observation to <b>occupation area</b> which already planted with pepper and some 20ubulate20 areas (in local term called <i>Klekak</i>). Occupation has been exist before company takeover.</li> <li>• <b>Division 1 Blok N11/12.</b> Observation to <b>conservation (HCV-1)</b> management implementation. The particular areas also has lowlying slope characteristic.</li> </ul> <p><b>Consulted Stakeholder</b></p> <ul style="list-style-type: none"> <li>• Cooperation, Private Micro Company, Trading &amp; Manpower Agency of Belitung Regency</li> <li>• Contractor for FFB Transport (PT Satrindo Jaya Agropalma).</li> <li>• Gender Committee of TKME.</li> <li>• Labour Union of PT Forestalestari Dwikarya.</li> <li>• Plantation Agency of Belitung Regency</li> <li>• Worker Union (SPSI) of Tanjung Kembiri Mill</li> <li>• National Land Agency of Belitung Regency</li> <li>• Gender Committee of TKMM</li> <li>• Local contractor for FFB transportation works</li> <li>• Environmental Agency of Belitung Regency</li> <li>• Village Council Head of Kembiri Village</li> <li>• Village Head of Kembiri Village</li> <li>• Village Head of Crucuk Village</li> <li>• Head of Sawit Sejahtera Bersama Cooperative</li> <li>• Land Owner in overlap area</li> </ul>
<b>2.3</b>	<b>Stakeholder Consultation and Stakeholders Contacted</b>
<b>2.3.1</b>	<b>Summary of stakeholder consultation process.</b>
	<p>Summary of stakeholder consultation process</p> <p>Consultation of stakeholders for PT Forestalestari Dwikarya was held by:</p> <ul style="list-style-type: none"> <li>• Public Notification on website Mutuagung Lestari 10 January 2020</li> <li>• Public consultation with government agencies of Belitung Regency conducted by visit and interview on 10 February 2020.</li> <li>• Public consultation by interview with locals of the nearby village (Cerucuk and Kembiri Village) on 11 February 2020</li> <li>• Consultation meeting and interview with Internal Stakeholder (labour union, worker cooperative, gender committee and local contractor) on 10-13 February 2020.</li> </ul>

	<ul style="list-style-type: none"> <li>Consultation with NGO (Sawit Watch, WWF, Walhi and AMAN) via email on 30 January 2020.</li> </ul> <p>Numbers of input from stakeholders were clarified by PT Forestalestari Dwikarya.</p>
<b>2.3.2</b>	<b>Stakeholder contacted</b>
	Please find appendix 1
<b>2.4</b>	<b>Determining Next Assessment</b>
	The next visit (ASA-1.2) will be conducted eight (8) month to twelve (12) month after date of annual license.



### 3. ASSESSMENT FINDINGS

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

MUTUAGUNG LESTARI has conducted an assessment of Tanjung Kembiri POM – PT Forestalestari Dwikarya, Golden Agri Resources, Ltd operation consisting of one (1) mill and two (2) oil palm estates.

During the assessment, there were two (2) opportunities for improvement were identified.

MUTUAGUNG LESTARI found that Tanjung Kembiri POM – PT Forestalestari Dwikarya complied with the requirements of Principles and Criteria for the Production of Sustainable Palm Oil 2018, endorsed by the RSPO Board of Governors and adopted at the 15<sup>th</sup> Annual General Assembly by RSPO Member on 15 November 2018 and RSPO Certification System for Principles and Criteria, 14 June 2017.

Therefore MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is continued.

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
<b>PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY</b>		
<b>1.1</b>	<b>The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</b>	
<b>1.1.1, 1.1.2, 1.1.3, 1.1.4 &amp; 1.1.5</b>	<p>Mechanism for consultation is listed in Consultation and Communication Procedure (SOP-SMART-UMUM-SADP-I-004) dated July 1<sup>st</sup>, 2016. The procedure explain that all the information request will be responded by company not more than 3 weeks after the incoming letter. The list of documents can be seen in document list of information for stakeholders (F/SMART/UMUM/SADV/004/003) update January 10<sup>th</sup>, 2020. The public documents, such as employee document (number of employee and list of basic wage), legal document, environmental documents, social document, OHS policy and program, and continuous improvement documents. The document also set stakeholder who can access the document. These documents are available in estate and mill office.</p> <p>Based on interview with Statutory Bodies in Belitung Regency, it is known that they understand how to communicate and consult with PT Forestalestari Dwikarya. However, based on interview with representative of Cerucuk and Kembiri Village, it is known that they have been understand the mechanism to communicate with company.</p> <p>The company also has monitoring and management report, such as OHS implementation report, report of environmental management and monitoring plan, land use report, and plantation activities report. These documents also can be accessed by public through the mechanism which has determined by the company. For example:</p> <ul style="list-style-type: none"> <li>- Land Use Report of PT FLD period of 2019 to Land National Agency of Belitung Regency on January 2<sup>nd</sup>, 2020</li> <li>- Employee Report period of 2019 to Manpower Agency of Bangka Belitung Province on February 2020</li> <li>- Production and Development Plantation Report Period of July – December 2019 on January 3<sup>rd</sup>, 2020 to Food and Agriculture Security Service of Belitung Regency.</li> </ul> <p>In addition to that, the company records requests for information from stakeholders which are recorded in the communication and consultation logbook and also the book People's Aspirations and Responses. Based on the results of verification, there were more incoming letters for the category of aid requests. For example:</p> <ul style="list-style-type: none"> <li>- Request for assistance for activities for the 73<sup>rd</sup> day of Bhayangkara Belitung from the Belitung police chief on June 19, 2019. The response from the company was carried out on July 2, 2019 by providing assistance for Bhayangkara activities.</li> <li>- Request for assistance for activities to fund the publication of tourism in the province of Babel from the Governor of the Bangka Belitung Islands on September 7, 2019, was responded to by the company on September 7, 2019 by providing financial assistance and publication to PT Micepro Indonesia (Governor of Bangka Belitung Islands).</li> </ul>	

**1.1.5**

The PIC for consultation and communication with the community is manager of each unit. The PIC is assigned to accommodate the implementation of social impact analysis, responsible for top management for communication and consultation with stakeholders Officers

List of stakeholders is made by SPO officer. The latest list of stakeholders is available for year of 2020, consist of statutory bodies, local communities, worker organization, FFB supplier, local contractor, etc. The information request from stakeholders is about assistance proposal and mandatory reporting information and all of information request has been respond from company.

**Status: Comply**

**1.2**

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

**1.2.1**

Company has commitment related to integrity and ethical conduct in all operational activities. The policy is also including in GSEP (GAR, Social, and Environmental Policy) stated about:

- Company will continue to practice and socialize shared values to all employees
- Human rights, labor, environment, and anti-corruption
- Not tolerate any act or form of corruption in the Business practice
- Implement ethical standards of conduct on the management of all business practices
- Recognizing, practicing, and promoting transparent good corporate governance

This policy has been socialized to the contractor and workers, for example on September 14<sup>st</sup> 2019 to workers of TRSE attended by 39 participants and on January 14<sup>th</sup> 2020 to contractor attended by 14 participants in TKMM. This policy is available in Indonesian Language. Based on interview with worker, scheme smallholder and contractor, it is known that they understand about the ethical conduct of the company. Auditor conducted interviews with several contractors, between local contractors for FFB transportation, based on the results of interviews with the contractor it can be concluded that the contractor has understood integrity and ethical conduct.

**1.2.2**

The system conducted by the company to ensure compliance and implementation of each policy (ethical behavior) is carried out by way of compliance audits and operational internal audits (OIA) which are carried out routinely every year. The last OIA was conducted on April 22 – May 3, 2019 (TKME), 1-12 May 2019 (TRSE) and May 11-16 (TKMM).

To ensure the legal compliance of the certification unit and third parties in the certification unit, routine monitoring is carried out once a year by means of compliance audit / internal audit. The last internal audit for RSPO and SCCs was conducted on 17 – 20 September 2019. The last internal audit results found 21 non-conformities, while the non-conformities were fulfilled on 30 October 2019.

**Status: Comply**

**PRINCIPLE #2 OPERATE LEGALLY AND RESPECT RIGHTS**
**2.1**

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

**2.1.1**

Summary of Indonesian applicable regulations pursuance are divided into six aspects, i.e. legal and business permit, social, manpower, environment, conservation and safety. For example, in term of land permit and legal status, the unit of certification shows evidence such as Annual Report of Land Title (HGU) Utilization of PT Forestalestari Dwikarya (PT FLD) for period 2020 that had delivered to National Land Agency (BPN) of Belitung Regency through Application Letter of Document and License Department (D&L) Coordinator of PT FLD for Belitung Region No. 01/FLD-MGR TKME/II/2020 dated 02 January 2020. Furthermore, there is evidence of online report on *Laporan Kegiatan Penanaman Modal Tahap Produksi/Operasi Komersial* PT FLD for period 2019 with acceptance evidence from Unit Deputy Bidang Pengendalian dan Pelaksanaan Penanaman Modal BKPM No. 392200 dated 10 April 2019, No. 439306 dated 10 July 2019 and No. 550879 dated 10 January 2020.



**Compliance with Manpower Regulation**

Certification unit in general has complied with manpower regulation, including:

- Reporting of Labor Report for PT Forestlestari Dwikarya Quarter 4 in 2019 to the Manpower and Transmigration Agency of Kepulauan Bangka Belitung Province on January 2020.
- Reporting of Employment Report of PT Forestalestari Dwikarya in 12 February 2020 and must report back on 12 February 2021.
- The implementation of the minimum wage in 2019 is in accordance with the Minimum Wage Decree of the Kepulauan Bangka Belitung Province established by the Governor of Kepulauan Bangka Belitung in November 2018.
- The implementation of the minimum wage in 2020 is in accordance with the Province Minimum Wage Decree established by the Governor of Kepulauan Bangka Belitung in October 2019.
- Payment of overtime wages to workers in accordance with Decree of the Minister of Manpower No. 102 of 2004.
- Implementation of the structure and scale of wages for all levels of workers in accordance with Minister of Manpower Regulation No. 01 of 2017.

**Compliance with OHS Regulation**

Certification unit in general has complied with OHS regulation, including:

- The establishment of the P2K3 (OHS Committee) for PT Forestalestari Dwikarya which were registered / approved by the Manpower Agency of Kepulauan Bangka Belitung Province in February 2020 (SK No. 188.4/003/P2K3/DISNAKER/2020 dated 13 February 2020).
- Provision of PPE for free to all workers and arrange the use of PPE according to the type of work based on the free predetermined HIRAC
- Have permits for all factory operating machines such as boiler and sterilizer machines that have been tested for eligibility according to applicable regulations (the last feasibility test was in May 2019).
- Has a license / competency for some special jobs that require more expertise such as OHS experts, hiperkes, boiler operators, diesel engine operators, welder, wheel loader operators and others in accordance with the requirements contained in the legislation.
- Has carried out a general health check (Medical Check Up) every year for all workers and special checks (cholinesterase, spirometry and audiometry) according to the level of risk / danger for certain jobs.

The compliance of regulations related to environmental aspects were regular SEIA management and monitoring, POME Land Application license, and hazardous waste storage license, etc.

**2.1.2**

The company has SOP Compliance with regulations & other requirements (SOP/SMART/GENERAL/SADV/II/002, dated July 1, 2014) which discusses: procedures for fulfilling requirements, completeness and flowchart which explain in detail in evaluating compliance with laws and regulations invitation, SPO requirements and others). The officers responsible for updating the list of regulations according to the SOP are: Identification of regulations at the national level by PCDV and at the regional level by regional SPO Officers and SPO Officer units.

To ensure compliance with the certification unit and third party laws in the certification unit, routine monitoring is carried out once a year by means of compliance audit / internal audit. The last internal audit for RSPO and SCCs was conducted on 17 – 20 September 2019. The last internal audit results found 21 non-conformities, while the non-conformities were fulfilled on 30 October 2019.

In addition to going through a compliance audit / internal audit, the company conducts monitoring and evaluation of third parties (contractors) through contractor evaluation activities which are conducted at least once a year. The last example of contractor evaluation was conducted in 2019 in both TRSE, TKME and TKMM. The types of evaluations carried out include contract compliance, contractor quality and performance, accuracy of work completion, compliance with labor regulations, OHS, housekeeping and the environment.

**2.1.3**

Procedure of legal boundary or BPN poles monitoring is presented in document No. SOP/SMART/CERS-EHSD/SADV/II/004 dated 01 July 2014. Monitoring is conducted twice a year. Boundary Poles Map is available in scale of

1:50,000. Monitoring of legal boundary poles is shown through document of "Monitoring Patok Batas HGU (Patok BPN) 2019" dated 31 December 2019 which informed that 338 unit of BPN poles in TKME and 607 unit of BPN poles in TRSE were satisfactory maintained. Based on observation to five BPN Poles in TKME and TRSE, it was known that BPN poles were satisfactory maintained and easy to identified. Furthermore, coordinate marked by Auditor through application GPS-Map were match with coordinate settled by BPN. Moreover, it was known that PT FLD has surrounded by village communities land which generally abandoned and small pepper (local name: *Sahang*) plantations. There is no evidence of over planted on the visited fields.

**Status: Comply**

## 2.2

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

### 2.2.1

In monitoring the use of contractors for plantation and factory activities, the certification unit has well documented the list of contractors, the number of workers they have, contact persons, work agreements, and ensuring other matters related to compliance with laws and regulations in Indonesia. At present the certification unit has 3 contractors with 137 workers and 4 suppliers. These contractors collaborate in the activities of transport FFB, CPO and PK.

In managing the contractor, the certification unit has a copy of the cooperation agreement in each unit. For example for agreement between two parties such as:

- Work Agreement TKME/SPKLL/Januari-2020/04-Transport TBS & Angkut Bronsus dated 02 January 2020 for the transportation of CPO which is valid for one year.
- Work Agreement No. 001/FLD/TKMM/01/2020-CPO dated January 2020 for the transportation of CPO which is valid for one year.

The explanation above can be concluded that the certification unit has managed and documented the list of contractors along with supporting documents.

### 2.2.2

In each work agreement between the certification unit and the contractor, there are several separate clauses related to fulfilling legal obligations in force in Indonesia as one of the obligations that must be fulfilled by the contractor. Some of these obligations are related to the registration of workers' BPJS (Government Insurance Scheme), the provision of minimum wages, the obligation to use PPE, other permits such as tax payment (NPWP), vehicle licenses (STNK), and others. To ensure compliance with these clauses, the certification unit always requests the requirements for the completeness before the contractor does / starts work.

The results interviews with contractor workers (FFB & CPO transport) revealed that workers had received wages above the minimum wage, were registered in the BPJS program, have a vehicle license (STNK), driving license (SIM) and the worker understood about his status as a permanent worker. This result is in line with the results of the document review which proves that the wages of contractor workers are above the minimum wage, have vehicle / driver license, fulfilling tax payments, BPJS payments and other requirements.

The certification unit has proven that all contracts have their own clauses regarding the fulfillment of applicable legal obligations, and are shown by the relevant third party.

### 2.2.3

In each work agreement between the certification unit and the contractor, there are clauses related to fulfilling legal obligations in Indonesia as one of the obligations that must be fulfilled by the contractor. Some of these obligations are related to disallowing child, forced and trafficked labor to be employed by the third party, and where young workers are employed, the contracts include a clause for their protection. To ensure compliance with these clauses, the certification unit always requests the requirements for the completeness before the contractor does / starts work.

The results of the document review of the list of contractor workers revealed that there were no workers under the age of 18 and the work provided was in accordance with the agreement when the initial worker worked. This is in line with the

results of interviews stating that no child laborers have worked up until now, there are no forced laborers / workers resulting from trafficking because all workers have understood the work agreement at the start of work and payment for the work is always equal.

The certification unit has proven that all contracts have clauses disallowing child, forced and trafficked labor to be employed by the third party, and where young workers are employed, the contracts include a clause for their protection.

**Status: Comply**

### 2.3

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

#### 2.3.1

Based on Tanjung Kembiri Mill (TKMM) production record for period 2019 to first quarter of February 2020, it was known that unit of certification is still implementing Mass Balance (MB) Supply Chain module for RSPO certified palm oil and kernel productions. Source of FFB supplier is presented as follows:

- TKMM has two (2) owned estates, i.e. Tanjung Kembiri Estate (TKME) and Tanjung Rusa Estate (TRSE) with area covers about 6,086.31 ha and 5,251.27 ha, respectively. Geo-location of owned estates are presented in chapter of basis info.
- Based on observed period, it was known that there were 10 FFB outgrower Suppliers of TKMM, abbreviation of suppliers is presented in Basic Info Chapter in this report. The unit of certification has collect all important data of its FFB suppliers comprises of geo-location, legality of land rights and business permit.

#### 2.3.2

All FFB suppliers are directly FFB grower (estates), not collected from collection centers, agents or intermediaries.

**Status: Comply**

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

### 3.1

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

#### 3.1.1

The company has documents on the long-term plan contained in the PT Forestalestari Dwikarya Feasibility Analysis period 2020 – 2024 that explain about business plan and operational management which includes: area statement, projections for production, CPO, PK, Revenue CPO and PK, cost estates, mill costs, purchase of plasma FFB, profit and loss, and net profit and loss.

Annual planning also evaluated at the end of year and compared with realization. Its annual planning can be adjusted based on field condition, financial condition or another reason.

#### 3.1.2

The company replanting program is planned to commence in 2023 with consideration of FFB production which has begun to decline, the difficulty of harvesters and output of harvesters who tend to decline. The company has a plan for replanting from 2020 to 2027, which can be described as follows:

Estate	Program Replanting (Ha)						
	2021	2022	2023	2024	2025	2026	2027
Tanjung Kembiri	-	-	2,014.97	2,273.16	1,550.98	0	0
Tanjung Rusa	-	-	0	0	588.11	2,249.40	1,808.05
<b>Total</b>	-	-	2,014.97	2,273.16	2,139.09	2,249.40	1,808.05

#### 3.1.3

The company has a procedure associated with operational internal audit in the SOP No. SOP-ISCC/IMT/OIA. The SOP approved by VPA and VPM, entered into force on 1 July 2011. Ensuring consistency of procedures implementation, the companies routinely conduct internal audit activities both agronomic and processing. It is held by the Department of Operational Internal Audit (OIA) every semester. The records of internal audit on first semester of 2019 has been

documented. Noncompliance records of internal audit has been corrected and verified by management. There is no revision of SOP at the recertification assessment. In each SOP, there is page of document control that record the revision if any.

Management review is conducted in conjunction with a review of the SCCS and OHS RSPO audit results on October 16, 2019. Points discussed in the management review of operational audit results include maximizing fruit production, maximizing fruit transport time so that the fruit produced is fresher. more careful in using local contractors, efforts should be made to use contractors who have complied with regulations. One of the results of the management review is that a contractor is checked to evaluate the work performance and compliance with regulations.

Each unit has documented the operations of the estate and mill production such as daily reports, supervisor workbooks, etc. The field visit at the mill shows that the unit has been documenting the daily activities in a daily production report that documented by using computerized systems.

**Status: Comply**

### 3.2

**The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.**

#### 3.2.1

Internal audit of PT FLD mill and estates has conducted simultaneously as follows:

- Internal audit of RSPO for period 2019 in PT FLD with scope of audit consist of TKMM, TKME, TRSE and TRSA, had carried out by four internal auditor from 17 to 20 September 2019. The audit has resulting 21 non-conformity (NCR) notes which all already closed in 30 October 2019.
- Internal audit of OSH management system for period 2019 with scope of audit consist of TKMM, TKME, TRSE, TRSA and Belitung Bulking (BLTB) had carried out by one (1) internal auditor from 16 to 20 September 2019, presented in document No. 08/PT.FLD-BABEL/INTA-SMK3/IX/2019 dated 20 September 2019. Explanation and description of NCR identified is presented in document No. F/SMART/UMUM/SADV/008/001 (Rev. 0).
- Management review towards RSPO, SCCS and OSH management system internal audit is presented in document No. F/SMART.UMUM/SSSE/010/001 (Rev. 0) dated 16 October 2019 and No. F/SMART/UMUM/SADV/008/001 (Rev. 00) dated 18 October 2019. Meeting of review is attended by 24 participants. All NCR had closed in 30 October 2019.

#### Worker Welfare

- Unit certification has set minimum wage regulations for all workers based on the stipulation of minimum wages by the Governor of Kepulauan Bangka Belitung for 2019 & 2020.
- Unit certification facilitates workers with adequate housing, electricity facilities, and availability of clean water in every publicly available housing.
- Unit certification is also committed to avoiding acts of discrimination, sexual harassment, child labor or acts of human rights violations in the work environment.

The continuous improvement related environmental has been implemented by the company among other but not limited to reducing the use of pesticides in line with Integrated Pest Management (IPM) plan, managed and monitored the environmental impact based on participatory assessment, waste reduction and disposal based on regulation (not open burning), mitigation of GHG, etc.

#### Best Management Practices

- Control of rat pests using owl predators (*Tyto alba*).
- Biological leaf caterpillar pests' control by planting and maintaining (conservation) beneficial plants, such as *Antigonon leptopus*, *Cassia cobanensis*, and *Turnera 27ubulate*.
- Since 2016, PT FLD was no longer using Paraquat.
- The company has implemented a new system, namely E-Fact (Electronic Field Activity Capture and Traceability) which is used as a traceability method to support harvesting activities. This system can clearly help minimize the difference in yields and updates every day through a computerized system. This system has been implemented at PT Forestalestari Dwikarya since the beginning of October 2018.
- Using a mini tractor (mechanization) in the application activities of the empty fruit bunch.

3.2.2	
Not Applicable until the issuance of the metric template by RSPO.	
	Status: Comply
3.3	
Operating procedures are appropriately documented, consistently implemented and monitored.	
3.3.1	
<p>PT Forestatestari Dwikarya has documents of SOP Technical of Oil Palm Cultivation starting from land clearing up to harvesting, approved by SMD Ops and entered into force on 12 June 2012. The SOP documents among others about planning of new area planting, replanting plans, nurseries, land clearing, planting, replanting, pest and disease control, weed control, fertilization, maintenance of immature plant, preparation ahead of harvest, harvesting, loading and transportation of FFB. The Oil Mill has SOPs covering all mill operations such as FFB Grading, Sterilization Station, Press Station, Threshing Station, Oil Room, Kernel Plant, Laboratory, CPO &amp; PK Dispatch, Engine Room, Boiler Room, Electrical, Workshop as well as Raw and Boiler Water Treatment Plant. That SOP's is available on audit site (Estate and Mill office) and written in a language that is easily understandable for workers (written in Bahasa).</p> <p>Interviews were conducted to harvesters, pesticides applicators, and manuring workers in TKME and TRSE and also operators in TKMM. Based on the results of interviews can be concluded that the workers understand the duties and responsibilities of their work in accordance with the applicable SOP. The entire procedure both of plantation and mill has been included of safe working instruction, other than those described in the HIRAC document.</p>	
3.3.2 & 3.3.3	
<p>The company has a procedure associated with operational internal audit in the SOP No. SOP-ISCC/IMT/OIA. The SOP approved by VPA and VPM, entered into force on 1 July 2011. Ensuring consistency of procedures implementation, the companies routinely conduct internal audit activities both agronomic and processing. It is held by the Department of Operational Internal Audit (OIA) every semester. The records of internal audit on first semester of 2019 has been documented. Noncompliance records of internal audit has been corrected and verified by management. There is no revision of SOP at the recertification assessment. In each SOP, there is page of document control that record the revision if any.</p> <p>Each unit has documented the operations of the estate and mill production such as daily reports, supervisor workbooks, etc. The field visit at the mill shows that the unit has been documenting the daily activities in a daily production report that documented by using computerized systems.</p> <p>Monitoring performance the contractor through a compliance audit / internal audit, the company conducts monitoring and evaluation of third parties (contractors) through contractor evaluation activities which are conducted at least once a year. The last example of contractor evaluation was conducted in 2019 in both TRSE, TKME and TKMM. The types of evaluations carried out include contract compliance, contractor quality and performance, accuracy of work completion, compliance with labor regulations, K3, housekeeping and the environment.</p>	
	Status: Comply
3.4	
A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.	
3.4.1	
<p>The company has had SEIA related documents divided in Environmental Impact Document/EIA (AMDAL), Social Impact Assessment (SIA) documents, and High Conservation Value (HCV) document. The Environment Impact Assessment has been endorsed based on Decree of Bangka Belitung Governor No 188.44/450.c/BAPEDALDA/2007. The scope of assessment estate, mill, and social aspect covering 11,337.582 ha area and 60 MT FFB/hours of Mill capacity. The Social Impact Assessment was conducted in 2012 by Social/CSR Department of PT SMART. Meanwhile the HCV identification has been conducted in 2012 by RSPO Approved Assessor, the identification result has been review by independent peer reviewer and has been consulted to affected parties on 22<sup>nd</sup> February 2013. Assessment held using HCV toolkit 2008. There are 7 types of RTE species found, namely: <i>Tarsius bancanus</i>, <i>Trachypiterhecus cristatus</i>, <i>Ptopus vampirus</i>, <i>Trangulus javanicus</i>, <i>Macaca vasicularis</i>, <i>Anthreptes simplex</i>, <i>Anthracoceros malayanus</i> and <i>Ichthyophaga humilis</i>. Total</p>	



HCV area covers 466.13 ha, consist of riparian area, cemeteries, sacred forest, water spring and sacred tree.

The Company shown evidences that the SEIA related documents has been arranged through participatory manner, involving affected stakeholders. For instance in SIA document attached minutes of meeting and questionnaire from Villages of Kembiri, Simpang Rusa, Air Kundur, Perpat, Lasar, and Cerucuk, and Suge. Based on interview with stakeholders (Labor Union, Gender Committee, Kembiri Village, Crucuk Village, Sawit Sejahtera Bersama Plasma Cooperative), known that SEIA conducted in participatory manner. Those assessments have identified the positive and negative impacts for internal and external stakeholder, as well as biodiversity, caused by company's operational activities, among others in aspects of livelihood, health, land tenure, employment, education, economy, social, cultural and religious, etc. Based on document review, field observation, and stakeholder consultation, known that the SEIA documents has covered all operational area and impacts of its activities.

### **3.4.2**

The EIA (AMDAL), SIA, and HCV documents has included the management and monitoring plans that arranged in participatory manner at the moment of the AMDAL, SIA, and HCV assessment. The management and monitoring plans documents namely semesterly Environmental Management and Monitoring Plan (*RKL/RPL*), annually Social Management and Monitoring Plan, and annually HCV Management and Monitoring Plan. The management and monitoring plans has cover the main issue identified in those documents.

### **3.4.3**

The management and monitoring plan of AMDAL, SIA and HCV has been implemented reported on semesterly Environmental Management and Monitoring Report (*RKL/RPL* Report), annual Social Impact Management and Monitoring Report, and annual HCV Management and Monitoring Report. The variables of management and monitoring plan and implementation in those documents has been implemented and evaluated in each report cycle. For instance in the *RKL/RPL* report of Semester II of 2019, there were some river water quality test that above the regulatory standard. The company shown justification that at the moment of sample taken, the river's debit data and rainfall data was very low, and has conduct the re-testing when the river's debit was normal. However, the testing result still in progress yet.

The updating of management and monitoring plan of AMDAL/*RKL-RPL* and HCV conducting if necessary, meanwhile for SIA updated in two yearly basis. Based on review of HCV Management and Monitoring Report of 2019, the issue and program for 2020 still relevant and there was no update of the program compared to the previous year. For Environmental Management and Monitoring Plan (*RKL/RPL*), the once had been updated in 2016. There was one variable added related land fire, based one issue raised on that moment. Then issued Environmental License (*Izin Lingkungan*) based on Decree of Bangka Belitung Province Governor on 26<sup>th</sup> February 2016.

Meanwhile for Social Management and Monitoring Plan, the latest update conducted on 2019 based on report of Social Impact Management and Monitoring Review of September 2019. That report has included the Social Management and Monitoring Report of 2018/2019, Review of Social Management and Monitoring Report of 2017-2019, as well as Social Management and Monitoring Plan for 2019-2021. The review was covered the community complaint (become NCR 2018.01 in previous audit) related the HGU complaint, environmental pollution, etc. For instance to response the community negative perspective related environmental pollution (leaking of POME Land Application), the company had submitted the proposal of POME LA area expansion to Environmental Agency, and then issued license of POME LA expansion area No. 188.46/001/KEP/IPAL/DPMPSTPP/2019 dated 11<sup>th</sup> October 2019. The area expand from 13 Blocks (279.98 ha) become 20 Blocks (439.9 ha). It was verified in the field that the company was in progress to build the trenches, and in the storage complex sighted the spare parts for POME LA such as parallon pipes.

Based on interview with stakeholders (Kembiri Village, Crucuk Village, Sawit Sejahtera Bersama Plasma Cooperative), known that social and environmental management conducted has been overcome the negative perspective from the community, even though the company needs to aware continuously for the further issue that might be raise.

In previous audit (RC), raise Minor Nonconformity No. 2019.01 in Indicator 6.1.4, related review of social management and monitoring plan that failed to cover the issue in mass media related to land disputes since 2015 and environmental pollution issues since 2016, such as on the website <https://beritalama.com> June 11, 2016, <https://bangka.tribunnews.com> December 26, 2018 and the 29th edition of the Belitong Betuah newspaper (January 30 - February 13, 2019). During the

ASA 1.1, the company has followed up the Non-conformity as follows :

- The company has re-identified and managed social issues in the 2019 Social Impact Management and Monitoring Review, which has covered these issues including the problems of land disputes and environmental pollution from POME LA.
- Results of interviews with the Kembiri Village and Cerucuk Village Officials, it is known that issues such as job vacancy information, trench washing disturbance, etc. have been managed by the company.
- The company has shown evidence that the Social Impact Management and Monitoring Plan and CSR Program have been prepared in a participatory manner with the community, and have been realized. The program includes the economic empowerment of rural communities such as the organic pepper program.
- Related to the environmental issue, the company had submitted the proposal for the POME LA expansion area, and issued Decree of Investment and Industry Agency No. 188.46 / 001 / KEP / IPAL / DPMPTSP / 2019 dated 11 October 2019. The covered area expand from 13 blocks (279.98 ha) to 20 blocks (439.9 ha). Additional area of blocks K59 - K64 (159.92 ha). Field observation, sighted of flatbed making in the bed and the spare parts such as parallon pipes in the warehouse. The results of field observations in the POME LA area did not reveal any indications of waste leakage.
- Regarding land dispute issues, the company implements management in accordance with the 2019 Social Impact Management and Monitoring Review, and company procedures related to land dispute handling, with the final progress as stated in Treatise (*Risalah*) of Meeting dated 04 February 2020 between two (2) PT FLD representatives, one (1) inheritee representative and two (2) witnesser from inheritees sides about proposal of compensation value of the overlapped areas in Division 7 Block L47 TKME. There were six (6) inheritees that legitimate by *Ketua RT*, Sub-Village Head of Air Gede, Village Head Kembiri and Sub-District Head of Membalong. The value is delivered to Head Office in Jakarta for approval or rejection response through email dated 04 February 2020. Based on observation to overlapped area in Division 7 Block L47, it was known that the overlapped area and/or palms has marked with red-cross paint and there is no indication of harvesting activities and/or other agronomy input on the particular field.

Based on those descriptions, it is known that the company has conducted a participatory social impact review, has identified the latest social impacts, and has been managed or is in the process of managing the impacts. This nonconformity is stated as comply.

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

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

##### 3.5.1

The certification unit has procedures related to recruitment, selection, employment, promotion, retirement and termination of employment which are generally described in the Collective Labor Agreement period 2019-2021 written in Bahasa. In general these procedures describe:

- Recruitment of workers is based on needs and adjusted to the ability of the company.
- The age of the prospective worker is a minimum of 18 years at the time of recruitment of workers.
- Recruitment of workers is based on the ability, expertise and assessment of prospective workers.
- The company is authorized to carry out the placement, transfer and promotion of workers in accordance with applicable regulations.
- Termination of employment can occur when a worker retires, dies, resigns, and terminates an employment agreement due to a serious violation and others.

In addition to being publicly listed in Company Regulations, the certification unit has other procedures in the form of Policies, SOPs, Internal Memorandums and others related to recruitment, transfer, promotion, retirement, termination of employment and others. These procedures have been documented to all workers and their representatives. One of the socialization given to workers was related to Company Policies and Regulations on (GSEP) in 28 January 2019 which was attended by 149 participants. For example some procedures that are owned by the company include:

- Procedure No. KHI-SMART/001-00 concerning Employee Recruitment
- Procedure No. KHI-SMART/002-00 concerning Employee Agreement
- Procedure No. KHI-SMART/010-00 regarding Employee Promotion & Transfer
- Procedure No. KHI-SMART/009-00 concerning Employee Ratings

The results of interviews with workers (harvesting, spraying and mill operators) in TKME, TKMM & TRSE note that workers have a sufficient understanding of the procedures related to recruitment, promotion, retirement and factors causing termination of employment. Workers explain that in the acceptance process carried out in accordance with the terms / conditions according to ability / expertise, promotion is based on an assessment of the performance of each employee each year, and one of the causes of termination of employment can occur if the worker has committed a serious violation. Based on this explanation, certification unit has explicitly state the indiscriminatory policy during the recruitment selection, hiring and promotion process

The certification unit did not have workers with contract status for daily worker (BHL), the current employee status is permanent workers who have Orientation Worker status (3 month orientation period), such as Regular Workers (below worker PT class 1-4) and Staff (above worker PT class). All the rights for each employment status has been distinguished. For workers with contract status (PKWT) they are still owned by the certification unit, but this status is only given to retirees who are rehired for a number of jobs such as security guards and drivers. The certification unit also registered the worker with the Cooperation, Private Micro Company, Trading & Manpower Agency of Belitung Regency in 11 February 2011.

From this explanation it can be concluded that the certification unit have procedures for recruitment, selection, employment, promotion, retirement and termination of employment must be documented / available to workers and their representatives.

### 3.5.2

The certification unit always documented all labor procedures that have been carried out properly such as recruitment, promotion, performance assessment and others. The following are some sample labor procedures that have been implemented and are well documented by certification unit, including:

- Harvesting Worker at TRSE who have work agreement document No. 040/FLD-TRSE/SK/11/2019 dated 26 November 2019 along with the complete recruitment requirements such as employee identity (KTP), family card (KK), job application letter, and other supporting documents. This worker is PT (Permanent Worker) that on probation period since 26 November 2019 to 26 February 2020 before worker has received performance evaluation at the end of probation period.
- Performance Evaluation 2019 for 627 workers at TRSE that has been issued in 31 January 2020 and 988 workers at TKME that has been issued in 05 February 2020.
- Decree of Promotion No. 002/SK-EM/TKMM/XII/2018 in 26 December 2018 for worker with Employee Number 14023 (Storage Foreman) that has been carried out a performance evaluation with value "*Baik*" and has been recommended to appoint as Storage Head.

The explanation above proves that the certification unit has implemented labor procedures properly and is documented for each employee.

<b>Status: Comply</b>
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## 3.6

**An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.**

### 3.6.1

The certification unit has had a policy of occupational safety and health were written in Bahasa. The policy has been legalized. This policy is designed to control hazards in every activity that is in the working environment to prevent accidents and occupational diseases. Management have work program of occupational health safety every year. Realization of the program of work will be monitored through regular meetings Guiding Committee of Occupational Safety & Health (*P2K3*) every month. This work program applies generally to all workers in the workplace. If the plans have been made yet on target then will be evaluated in the regular meetings to assess effectiveness.

Certification unit have document of hazard identification, risk assessment and risk control (HIRAC) which issued on January 2020. It will be reviewed if any occupational accident happen. The document describes the description/activity, potential hazards, risk assessment and risk control. Based on site observation at boiler and engine room in TKMM, it was clearly confirmed that workers had been aware related potential risk and hazards in the work place. Following up on this, the company has been reduce the potential risk by routine socialization about OHS, providing PPE, and OHS signboard are available in workplace.



Interviews with estate workers (harvester and sprayer) and mill workers (mill operators). Based on the results of interviews can be concluded that workers understand the OHS policy and it's recognized that every morning meeting is always affirmed about the importance of safety and the use of PPE in work. For example mill employees exposed to high noise such as boiler employees and engine rooms who have used a complete hearing protection device according to risk analysis, namely ear muff and ear plug. There is no complaints from employees exposed to high noise exposure. To ensure that every workers are in good health then certification unit do the medical check up. The results of each employee's health examination have been properly stored. Last medical checkups conducted in January 2020. The result of medical test showed that workers were in good health and fit to work.

### 3.6.2

Realization of the program of work will be monitored through regular meetings Guiding Committee of Occupational Safety & Health (*P2K3*) every month. This work program applies generally to all workers in the workplace. If the plans have been made yet on target then will be evaluated in the regular meetings to assess effectiveness. The following are examples of the realization by the certification unit in 2019, including:

- OHS inspection of PPE compliance of workers and other equipment on 06, 13 & 20 December 2019 conducted inspection in work locations found that there were all workers whose has been using an appropriate PPE.
- Dissemination of the dangers of drugs to workers and residents of housing by installing warnings of the dangers of drugs in every employee's housing, office and other areas.
- Identification of areas with potential emergency hazards such as areas prone to fire, explosion, land / water pollution, and workplace accidents and the results of monitoring conducted every months. The last examination was in December 2019.
- Inspection of the availability and condition of first aid boxes in for the in 2019 conducted in December 2019 with the results of all first aid boxes carried by each field foreman, first aid kit in the office and in the warehousing area are still in good condition and available in 21 types of items in accordance with applicable laws and regulations. If there is item that had not available, the first aid officer will immediately added new item.
- *P2K3* Meeting in 20 & 27 December 2019 (TKMM and TKME) on which discussed the evaluation of the implementation of OHS in December, the annual evaluation of OSH implementation, preparation of the OSH work program in 2020, and others attended by *P2K3* officers.
- Safety induction on 10 June 2019 to 17 contractor workers.

Based on interview & Observed with pesticide applicator in Estate and process operators at Mill, certification unit has been provide adequate and appropriate protective equipment available to all workers at the place of work to cover all potentially hazardous operations. For example, Sterilizer Operators that has been provide PPE such as safety shoes, helmet, ear plug, & gloves. Safety induction for all auditors when audit in every unit (estate and mill).

<b>Status: Comply</b>
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### 3.7

**All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.**

#### 3.7.1

Company has training program for workers for period of 2020 for operational training. The aspect in the training program are such as environment, labor best management practice aspect, and others. Some of training program, namely:

- Socialization of OSH, work risk, and PPE on April and September 2020 (for employee and contractor)
- Socialization of company's policy on July 2020 (for employee and contractor)
- Socialization about integrated pest management
- First aid training (for employee and contractor)
- Training for Environment and hazardous waste handling.

Based on interview with worker in estate and mill, they have received some training related to their work, such as work procedure training, emergency response, and first aid training. The training has been documented into minutes of meeting, list of attendees, and photo activity.

#### 3.7.2

Company has showed the documentation of training or socialization whether it is internal or external training in form of minutes of meeting, list of attendees, and photo activity. For example:

- Fire and emergency response simulation in TKMM on December 14<sup>th</sup> 2019 attended by 10 participants
- Weed Control, Spraying and Manuring training on January 12<sup>th</sup>, 2019 attended by 71 participants
- Socialization of GSEP on August 5<sup>th</sup> 2019 attended by 20 participants
- Training for manage and monitoring HCV on January 10<sup>th</sup>, 2019 attended by 32 participants
- Heavy Equipment Operator Training for 6 workers on 21-24 January 2019 conducted by PJK3 PT Formasi Sistem Internasional.

Based on interviews with local contractors (FFB transport) and CPO and PK (SJA) transport contractors it was explained by them that the company had conducted training related to the use of PPE, contractor employees could explain the functions and benefits of PPE itself. In addition, contractor employees are aware of the policies of PT FLD contained in the GSEP.

### 3.7.3

Training on supply chain certification system has conducted through socialization and refreshment which conducted at TKMM in 29 January 2020 that attended by 9 participants from structural staff (assistant level), and in 03 February 2020 that attended by 28 participants from operational staff (analyst, driver, compound, FFB grader, dispatch operator, laborant, sample boy, weighbridge operator and security). Based on interview with Weighbridge Operator of TKMM, it was known that mill has receive FFB from owned estates which already RSPO certified and another 10 FFB suppliers which not RSPO certified yet, included from PT FLD non certified areas in TRSE. Record of FFB accepted is recorded through application namely WeighBridge Version 3.41 and eFact 2.0 for mill and FFB suppliers, respectively. Those application had designed for separation between RSPO certified and non-RSPO products. FFB Delivery Ticket using electronic system by NFC-card scan. Weigh Ticket informed certificate ID of ISCC and mass balance (MB). However, FFB delivery from Non-RSPO certified areas is conducted manually through document of "Surat Pengantar Buah" that stamped by NC symbol that meaning of Non Certified. Furthermore, weighbridge ticket from non-certified areas are not marked with certificate ID of ISCC and MB information.

**Status: Comply**

## 3.8

### Supply Chain Requirements for Mills

#### 3.8.1 and 3.8.2

Based on TKMM production data for period 2019 to January 2020 review, as well as interview with Security Officers and Weighbridge Operators, it was known that TKMM has only received FFB from TKME and TRSE as main supplier and another 10 Out growers, which all were Non-RSPO certified yet. Thus, it could be concluded that TKMM of PT FLD has claim its RSPO certified products (CPO and PK) from processing of the certified FFB as Mass Balance (MB).

#### 3.8.3

Estimation volume of RSPO certified crude palm oil (CPO) and palm kernel (PK) that produced by TKMM of PT FLD for 2019/2020 license period is presented in the Certificate Appendix and could be accessed through RSPO Palm-trace and this ASA-1.1 report. Record of RSPO certified production is presented in the following Table:

Certified Product	Last Year Projection 21 Apr 19 to 20 Apr 20 (mt)	Actual Production Feb 19 to Jan 20 (mt)	Estimation 2020/2021 21 Apr 20 to 20 Apr 21 (mt)
FFB	265,000	233,150.64	249,500
CPO	55,650	47,796.44	52,400
PK	15,900	15,194.69	15,200

(Note: OER projection 21.00 % vs OER actual 20.40 %; KER projection 6.00 % vs KER actual 6.41 %; For estimation FFB increase 7.00 %).

Up to ASA-1.1, it was known that there is no certified products volume extension since the credit was available in positive stock.

#### 3.8.4

RSPO IT Platform member registration number for TKMM of PT FLD: RSPO\_PO1000001383.

As checked through RSPO Palm-trace in 11 February 2020, it was known there is number of Certified Sustainable Palm Oil (CSPO) and Certified Sustainable Palm Kernel (CSPK) sold for period 21 April 2019 to 10 February 2020 are summarized in the following Table:

<b>Certified Product</b>	<b>Last Year Projection (mt)</b>	<b>Remaining Certified Products (mt)</b>	<b>Additional Volume Extension (mt)</b>
CSPO	55,650	12,498.24	-
CSPK	15,900	2,628.25	-

All stock transactions for CSPO and CSPK sold has recorded by unit of certification, for example:

- Removing stock of CSPO transaction for ISCC in 07 July 2019 for 9,155.14 mt CSPO and for 09 October 2019 for 15,464.43 mt CSPO, had identified through Stock Transaction ID No. ST-TR-a0cb7d3e-5b5a and No. ST-TR-d286bee9-0799, respectively.
- Shipping Announcement No. TR-e9517aa7-90a7 dated 22 January 2020 related to the sale of CSPK of 950 mt to PT Ivo Mas Tunggal – Lubuk Gaung.

### 3.8.5

Procedure of RSPO mass balance supply chain is presented in document No. PT.FLD.TKMM/SOP/23 (Rev. 10) dated 16 January 2020. Several revision points being added in the new procedure is presented as follows:

- Monitoring of RSPO quota is conducted by KTU, PIC of mass balance and Sales. Those PIC is making coordination with PCDV when predicted over production of certified products before the end of license period.
- To accept eFact and FFB Delivery Notes from Driver for electronic recording method through WeighBridge application.
- To revise reference of SSC to RSPO P&C Generic 2018 document proposed for adoption by RSPO General Assembly in 2018.
- Explanation of eFact as electronic recording of FFB production accepted/delivered to the mill.
- To input information towards eFact card utilization in accepting FFB on mill.

Furthermore, mechanism of monitoring stock data and quota estimation of certified RSPO products is presented in Circular Letter of Production Controller (PC) of Bangka Belitung No. 004/LWSM-PC/II/2019 dated 28 January 2019 which mentioned that KTU and its staff are required to make monthly and quarterly mass balance monitoring production report. Coordination with PCDV shall be conducted when estimated overproduction of actual production of certified products against its quota. Afterwards, PCDV will informed certification body for additional volume extension request, with detail of agro for certified FFB, CPO and PK for about 15,000 mt; 3,500 mt; and 1,000 mt, respectively.

Based on interview with Weighbridge Operator of TKMM, it was known that mill has receive FFB from owned estates which already RSPO certified and another 10 FFB suppliers which not RSPO certified yet, included from PT FLD non certified areas in TRSE. Record of FFB accepted is recorded through application namely WeighBridge Version 3.41 and eFact 2.0 for mill and FFB suppliers, respectively. Those application had designed for separation between RSPO certified and non-RSPO products. FFB Delivery Ticket using electronic system by NFC-card scan. Weigh Ticket informed certificate ID of ISCC and mass balance (MB). However, FFB delivery from Non-RSPO certified areas is conducted manually through document of "Surat Pengantar Buah" that stamped by NC symbol that meaning of Non Certified. Furthermore, weighbridge ticket from non-certified areas are not marked with certificate ID of ISCC and mass balance (MB) information.

### 3.8.6

Procedure of RSPO-SCCS internal audit is presented in document No. SOP/SMART/UMUM/SADV/II/009 dated 01 July 2014 which mentioned in Section X that internal audit shall be conducted minimum once a year, that method of audit is refers to procedure No. SOP-AGR-040-R03 dated 01 October 2015 about management system; RSPO SCCS standard; RSPO market communication and claim; as well as another related applicable regulations. Unit of certification shows internal audit for RSPO including SCCS that carried out by four internal auditor from 17 to 20 September 2019. Management review towards RSPO and SCCS internal audit is presented in document No. F/SMART/UMUM/SSSE/010/001 (Rev. 0) dated 16 October 2019 and No. F/SMART/UMUM/SADV/008/001 (Rev. 00) dated 18 October 2019. Meeting of review is attended by 24 participants. All NCR had closed in 30 October 2019.

**3.8.7**

TKMM has monthly record of FFB received as RSPO certified and non-certified. For example record for period Feb 2019 to Jan 2020 is presented in the following Table:

Month	Volume of FFB (mt)		
	RSPO Certified	RSPO Non-Certified	Total FFB
Feb 2019 – Jan 2020	233,150.64	89,084.49	322,235.13

Based on the Table above, it was known that unit of certification has satisfactory records FFB production and divided its RSPO Certified and non-certified status. Furthermore, based on annual (12 months) productions review it was known that there is no FFB overproduction of against credit given during one year of license.

**3.8.8**

Unit of certification shows shipping document which informed the name and address of buyer and seller; loading or shipment / delivery date; description of the product RSPO certified Mass Balance model, date on which the documents were issued; quantity of the products delivered; as well as any related transport documentation. For example as follows:

**CSPK Delivery**

- *Izin Masuk Pabrik* or Mill Enter Permit for PK Transporter (PT Lintas Transindo) which informed date, driver name, vehicle number, contract number, driver license or ID and time. the Form signed by Security and KTU/Assitant/Mill Manager.
- *Permintaan pengisian Komoditi* or Commodity Loading Request for PK which also form has also informed product quality. The Form signed by Laboratory Assistant and Mill Manager.
- *Berita Acara Pemasangan segel* or Official Letter of Seal Attachment which informed transporter vehicle police number, date, time and identity of deriver.
- Weighbridge Card which informed volume/tonnage, certificate ID that informed status of product as ISCC and RSPO MB, number of contract and DO, identy of transporter and clerk.
- Delivery Note which informed date, volum of product delivered, number of contract and DO, quality of product delivered, seal number, transporter information and time. the Form signed by driver, production clerk and Mill Manager.
- Exit Permit which informed transporter and buyer information, time, number of contract, date and time of delivery. The Form signed by Production Clerk and KTU/Assitant/Manager.

**Shipping Announcement CSPO**

Seller: PT FLD (RSPO Member ID No. RSPO\_PO1000001383)

Buyer: Remove stock, sold as ISCC

Transaction Date: 07 January 2020

Product: CSPO 14,383.79 mt

Supply chain model: Mass balance

Transaction ID: ST-TR-a66dd45c-0ac0.

**Shipping Announcement CSPK**

Seller: PT FLD (RSPO Member ID No. RSPO\_PO1000001383)

Buyer: PT Ivo Mas Tunggal – Lubuk Gaung (RSPO Member ID No. RSPO\_PO1000001383) with buyer Ref. No. 4800049646

Shipping Date: 26 December 2019; Convirmation date: 09 January 2020

Product: CSPK 700.00 mtSatrind

Program: Mass balance

Transacion ID: TR-fcafd5ae-7def.

**3.8.9**

The unit of certification has legal ownership of CPO and PK. TKMM do not outsource refining and kernel crushing activities. Only transportation of certified products (CPO and PK) are outsourced to the third parties, as shows through several Work Agreement such as Agreement with CPO Transporter of PT Satrindo Jaya Agropalma No. 001/FLD/TKMM/01/2020-CPO

dated 02 January 2020 and Agreement with PK Transporter of PT Lintas Transindo No. 001/FLD/TKMM/01/2020/PK dated 02 January 2020. Work agreement/contract in Point No. 7 has stated that contractor is required to comply with certification standard requirement, included to allows CB to access contractor information, as well as its operational and system. This matter has also stated in Contractor Statement Letter dated 6 January 2020. Control mechanism concerning contractors' activities related to certified products transportation against RSPO-SCCS is recorded in Form No. Formulir/Smart/MCAR/XVI/TA-PKT/03 dated 26 March 2012, revised in 01 February 2019. However, procedure of contractor control and monitoring which currently presented in document No. SOP/Smart/MCAR/XVI/TA/PKT is still under evaluation.

### 3.8.10 and 3.8.11

Unit of certification has list of contractor for CSPO and CSPK transporter included contractor company profile data which consist of legality, address, contact person, email and phone number, contract agreement and period, list of vehicle (trucks), etc. Cooperation with those two contractors had carried out since 2013/2014 and there is no new contractor for this year.

### 3.8.12

Unit of certification has record and balance all RSPO CSPO and CSPK, as well as its dispatch on a monthly basis, as presented in the following Table:

#### CSPO Production and Dispatch

Period	CPO Production (mt)			CSPO Dispatch (mt)			
	Cert	Non-Cert	Total	RSPO	ISCC	Conv.	Total
Feb 2019 – Jan 2020	47,796.44	18,215.80	66,012.24	-	43,941.12	-	43,941.12

#### CSPK Production and Dispatch

Period	PK Production (mt)			PK Dispatch (mt)			
	Cert	Non-Cert	Total	RSPO	ISCC	Conv.	Total
Total	15,194.69	5,480.40	20,675.09	14,734.75	-	-	14,734.75

Based on the Tables above, it could be concluded that delivery of RSPO certified product (CSPO and CSPK) has only derived from a positive stock.

### 3.8.13 and 3.8.14

TKMM has perform FFB processing to produce CPO and PK only. Conversion factors are based on actual extraction.

### 3.8.15

TKMM has implementing RSPO mass balance supply chain system. Separation has only conducted through administrative recording. Source of FFB received by TKMM is classified from owned estate certified, owned estate non-certified (total 48.81 ha in TRSE from Division 1 (Block H07, K08, L09 and K12), Division 2 (Block R17/18, P15), Division3 (Block N24)) and outgrower as detailed explained in Indicator 2.3.1. All FFB suppliers has recorded /recapitulated/and maintained its current status. During shipping the truck is sealed to ensure that the RSPO certified product does not mixed with other sources.

### 3.8.16

TKMM has been registered of certified products of RSPO (CSPO and CSPK) in RSPO IT Platform with Member ID No. RSPO\_PO1000001383. License status is active. Based on delivery and transaction document review, it was known that announcement is carried out less than three months after delivery date and removing stock of RSPO certified product which sold under other scheme (ISCC) and/or conventional are properly conducted by unit of certification management

### 3.8.17

According to transaction documents in 2019, it was known that all CSPK from TKMM are claims as mass balance and conventional, while CSPO sold as ISCC and conventional. TKMM does not use RSPO logo on product or off product.

**Status: Comply**

## PRINCIPLE #4 RESPECT COMMUNITY AND HUMAN RIGHTS AND DELIVER BENEFITS



<b>4.1</b>		
<b>The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.</b>		
<b>4.1.1 &amp; 4.1.2</b>		
<p>The certification unit has a commitment to respecting human rights and describe in the GAR Social Environment Policy dated September 2015 using Bahasa. The commitment of the certification unit in respecting human rights has been quite well implemented in the absence of issues and incidents of human rights violations that occurred in the operational area of plantations and factories. This is evidenced by statements from plantation workers (harvesters, sprayers and maintenance), factories (mill operators and warehouse workers) as well as contract workers who state that so far there have been no incidents or issues of human rights violations occurring in the operational area of the certification unit.</p>		
<p>Based on the explanation above, during the past year there were no issues / incidents of human rights violations that occurred in the vicinity or the operational area of the certification unit so that there were no acts of intimidation / violence carried out by the certification unit including contracted services such as security services that were contracted and others.</p>		
	<b>Status: Comply</b>	
<b>4.2</b>		
<b>There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.</b>		
<b>4.2.1, 4.2.2, 4.2.3 &amp; 4.2.4</b>		
<p>Mechanism for consultation is listed in Consultation and Communication Procedure (SOP-SMART-UMUM-SADP-I-004) dated July 1<sup>st</sup>, 2016. The procedure explain that all the information request will be responded by certification unit not more than 3 weeks after the incoming letter. And also the responsible party to accept and response the consolation. Procedure is available in Bahasa Indonesia and if there is any complaints/grievances that the resolution that has not found mutually, the complainants can brought that compliance to RSPO Complaints System.</p>		
<p>Based on interview with Statutory Bodies in Belitung Regency, it is known that they understand how to communicate and consult with PT Forestalestari Dwikarya. However, the results of interviews with representatives of surrounding communities, the community has known about the communication procedures and to people who served as communicators between the company and community so that people who cannot read / write can be informed by the related communicators. However, certification unit can showed the documentation of socialization of Consultation and Communication Procedure to Lasar, Perpat, Air Kendur, Cerucuk, Simpang Rusa, Air Gede dan Kembiri Village on 08-10 January 2019 attended by 70 participants.</p>		
<p>Based on the review of complaints / complaints documents from the surrounding community, it was found that there were complaints related to overlapped areas (0.38 Ha) with claimant from Kembiri Village. The complaint has been responded in FPIC and has had a mutual agreement in accordance with the time period between the claimant &amp; certification unit. This complaint has included other parties such as the DPRD (Parliament) and Government Representative as givers of consideration in the resolution of the complaint. The last communication between parties was conducted in 04 February 2020 and the result is the proposal for compensation will be sent to the Jakarta Head Office for approval / rejection. Further explanation is explained in criterion 4.4.</p>		
	<b>Status: Comply</b>	
<b>4.3</b>		
<b>The unit of certification contributes to local sustainable development as agreed by local communities.</b>		
<b>4.3.1</b>		
<p>Determination of local development programs were based on SIA report and Social Management and Monitoring Plan, then stipulated in annual CSR program. Therefore, the participation manner conducted simultaneously in SIA and two yearly basis Social Impact Management and Monitoring Plan Review, latest conducted in 2019.</p>		
<p>The main program that has been conducted to improve the local sustainable development was the establishment of Plasma (scheme smallholder) plantation for Kembiri Village community, even though the company has no mandatory obligation to build plasma based on government regulatory. The Plasma was full managed based on agreement with Sawit Sejahtera Bersama Cooperative (No. 01/SPK/KSSB-FLD/06/2012 dated 1<sup>st</sup> June 2012, then addendum No. 001/KSSB/KB/07/2013 date 30<sup>th</sup> July 2013) amount of 684.32 ha.</p>		

The other community development programs were set in annual CSR Program. Based on document review of CSR Report of 2019, as well as consultation with stakeholder, known that the company has implemented the CSR program in aspects of agricultural, educational (e.g honorary teacher), social (e.g *maras taun*), economic (e.g organic peper, boiler chicken), infrastructure, healthy, etc.

Based on interview with stakeholders (Kembiri Village, Crucuk Village, Sawit Sejahtera Bersama Plasma Cooperative), known that the Plasma and other CSR program has been improve the villager wealthness.

**Status: Comply**

#### 4.4

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

##### **4.4.1; 4.4.2 and 4.4.6**

Procedure of FPIC is presented in several documents, as follows:

- Document No. SOP/SMART/SENS-CSCR/SADV/002 and No. SOP/SPO/SMART/LH-04 dated 01 July 2010 about social conflict resolution.
- Document No. SOP/NP/SMART/VII/D&L.002 dated 01 July 2010 about land compensation.

Unit of certification has covers area for about **11,337.58 ha**. Up to ASA-1.1, there is no land expansion or additional operational areas in PT FLD. Legal ownerships are still remain the same as shows through several documents, as follows:

1. HGU certificate No. 1 for 1,082.20 Ha valid until 31 December 2078
2. HGU certificate No. 13 for 4,668.43 Ha valid until 5 December 2096
3. HGU certificate No. 14 for 5,586.952 Ha valid until 20 July 2040

The use of land of palm oil is not diminish the legal customary or user rights of other users, as shows through several documents, as follows:

##### **Customary Rights**

Based on SIA and HCV report review, it was known that there is no customary right is unit of certification operational areas. Furthermore, it was informed there were no customary rights in whole Belitung Regency.

##### **Community Rights**

Land acquisition through compensation has been conducted since 1995. National Land Agency (BPN) of Belitung Regency and Unit of certification informed that there is no additional estate operational areas. There is evidence of compensation for 58 community land units, summarized as follows:

- Compensation in 1994 has conducted to four (4) land owners, located in Sub-Regency of Membalong, for area covers about 1.53 ha, with total value of IDR 450,000.-.
- Compensation in 1995 has conducted to 54 land owners, located in Sub-Regency of Membalong, for area covers about 22.39 ha, with total value of IDR 13,738,500.-.

All compensation documents such as letter of affirmation (agreement), right extrication act, receipt of payment and picture documentation has signed by land owner(s), Head of Kembiri Village and Head of Membalong Sub-Regency (*Camal*), as government representative. All document mentioned has sighted and observed during re-certification assessment.

##### **Update on overlapped area (0.38 ha)**

- Information of SHM of claimant No. 27.Kembiri dated 02 April 1987 and HGU of PT FLD No. 13 dated 05 December 2001.
- Participative field mapping and measurement activities picture documentation dated 24 February 2018 that conducted by inheritee and PT FLD representative. The map is presented in document No. 034/100/PLMO/02/18 dated 24 February 2018, with scale 1:5,000. Overlapped palms were identified and marked on the map (69 palms).
- Inheritee proposal of compensation letter dated 09 November 2018 value for IDR 95 millions has responded by PT FLD through Letter No. 012/FLD-D&L2/XI/2018 dated 14 November 2018 which informed that value of compensation proposed by company was IDR 20 millions only, without any compensations for plants above overlapped areas.
- Minutes of discussion with DPRD (Parliament) of Belitung Regency dated 29 January 2019, attended by 25 stakeholders, included government representatives. The meeting resulting that resolution shall be conducted through "*Musyawaharah Mufakat*" or consensus.

- Minutes of mediation with Head Office Jakarta dated 08 March 2019 which informed that compensation is only accepted when refers to NJOP of Kembiri Village that totaling about IDR 26 millions. Minutes signed by Acting Head of Kembiri Village and Inheritee representative.
- Advocate/Lawyer Ariel Siva Legal Assistance & Law Office Letter No. 13/07-KAAS/VII/2019 dated 05 July 2019; No. 05/08-KAAS/VII/2019 dated 07 August 2019; and No. 17/08-KAAS/VII/2019 dated 22 August 2019. Those letters subjected on summation (*somas*) towards overlapped area covers 0.38 ha located in Division 7 Block L 47. Those letters had responded through Letter of TKME Manager No. 01/IX/2019 dated 02 September 2019 about completeness of inheritees/claimant relevant data towards overlapped areas. Coordination report towards this matters had delivered to Head Office in Jakarta via email dated 18 September 2019.
- Claim chronology dated 18 September 2019 prepared by D&L Staff and TKME Manager, which explained time line of claim where starts since 19 February 2018 for overlapped area covers 0.38 ha located in Division 7 Block L 47.
- Treatise (Risalah) of Meeting dated 04 February 2020 between two (2) PT FLD representatives, one (1) inheritee representative and two (2) witnesser from inheritees sides about proposal of compensation value of the overlapped areas in Division 7 Block L47 TKME totaling about IDR 75 millions. There were six (6) inheritees that legitimate by Ketua RT, Kadus Air Gede, Kepala Desa Kembiri and Camat Membalong. The value is delivered to Head Office in Jakarta for approval or rejection response through email dated 04 February 2020.
- Based on observation to overlapped area in Division 7 Block L47, it was known that the overlapped area and/or palms has marked with red cross paint and there is no indication of harvesting activities and/or other agronomy input.

#### **Business Permit and Land Legality Rights**

- Plantation Business Permit (IUP) of PT FLD is shows through Decree of Belitung Regency No. 525/00525/IUP-KEB/IV/2003 dated 24 March 2003 for oil palm plantation in area covers about 12,232.43 ha and its processing mill with capacity 60 ton FFB/hour.
- The current area of the unit of certification were formerly acquisition from the previous company namely PT Angkasa Puri and several communities land. Total operational areas of PT FLD was 11,386.39 ha, which part of 48.81 ha were still ongoing to obtained its Land Title (HGU). Thus, RSPO certified areas for the unit of certification is 11,337.58 ha that divided into three (3) certificates, as follows:
  1. Certificate No. 1 dated 29 March 1994 for area covers 1,082.20 ha in Kembiri Village, Membalong Sub-Regency. Certificate valid until 31 December 2018. Thereafter, the certificate renamed under PT FLD through HGU Certificate No. 1/HGU/BPN/1994 issued by BPN of Belitung Regency on 24 March 1994. Certificate is valid until 31 December 2078.
  2. Certificate No. 13 dated 03 December 2001 for area covers 4,668.43 ha (a. 923.50 ha and b. 3,744.93 ha) in Kembiri Village, Membalong Sub-Regency. Certificate is valid until 05 December 2096.
  3. Certificate No. 14 dated 06 September 2005 for area covers 5,586.952 ha in the Village of Kembiri, Perepat, Lasar and Simpang Rusa at Sub-Regency of Membalong; Village of Cerucuk at Sub-Regency of Badau; and Village of Perawas at Sub-Regency of Tanjung Pandan. Certificate is valid until 20 July 2040.

#### **Additional Note:**

The non-certified area for about 48.81 ha that divided into seven (7) fields were still ongoing as the last document evidence shows through seven Letters of Application from Director of PT FLD to Head of BPN of Belitung Regency dated 11 to 13 December 2017 (described in the re-certification assessment). All proposed HGU areas were located in TRSE, summarized as follows:

No.	Location	Area (ha)
1	Block R 17/18	23.57
2	Block N24	0.4498
3	Block L9	2.805
4	Block K12	1.95
5	Block P15	10.84
6	Block L10	5.25
7	Block H7	4.044
<b>Total</b>		<b>48.8088</b>

Based on interview with BPN of Belitung Regency representative, the interviewee is not be able to explained the root



cause of delayed of Treatise or "*Risalah Panitia B*" on the proposed areas.

#### 4.4.3

The unit of certification shows several land status map, as follows:

- Overlay map of PT FLD with Layout Map (RTRW) of Bangka Belitung Province in 1994 indicates that all operational areas were located on "*Area Penggunaan Lain (APL)*" or Another Land Purpose for plantation activities.
- Overlay map of PT FLD with Forest and Waters Status as issued through Decree of Minister of Forestry No. SK.798 Menhut-II 2012 dated 27 December 2012 indicates that all operational areas were situated on APL status.
- Participative field mapping and measurement activities picture documentation dated 24 February 2018 that conducted by inheritee and PT FLD representative. The map is presented in document No. 034/100/PLMO/02/18 dated 24 February 2018, with scale 1:5,000. Overlapped palms were identified and marked on the map (69 palms).

#### 4.4.4 and 4.4.5

All agreement, negotiation are provided in Bahasa. Compensation has conducted directly to land owners that witnessed by Head of Village and Sub-Regency.

**Status: Comply**

#### 4.5

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

##### 4.5.1

Procedure of FPIC and social conflict resolution is presented in document No. SOP/SMART/SENS-CSCR/SADV/002 and SOP/SPO/SMART/LH-04 dated 01 July 2010. Meanwhile, procedure for land compensation is presented in document No. SOP/NP/SMART/VII/D&L.002 dated 01 July 2010.

Based on year of planting data review and information from Estates management, it was known that palms in TKME and TRSE were planted between 1995 to 1998. However, and up to ASA-1.1 there is no new planting and/or land expansion after 15 November 2018 in PT FLD. Document which informed identification and assessment towards legal, customary and user rights, in relation with FPIC process, are presented in several documents, as follows:

- HCV identification report that has passed peer review by independent consultant Resit Sozer, with public consultation to stakeholder which conducted in 22 February 2013. FPIC process had carried out to 40 participants from the Village of Lassar, Simpang Rusa, Kembiri dan Cerucuk.
- SIA study report which informed scope of study included the Village of Kembiri, Simpang Rusa, Membalong, Perpat, Lassar, Cerucuk and Pegantungan.
- Environment document through AMDAL as issued through Decree of Governor of Kepulauan Bangka Belitung No. 188.44/450.c/BAPEDALDA/2007.

Land acquisition of PT FLD has conducted through compensation payment which had carried out in 1994 and 1995, as shows through compensation evidence for 58 community land units, summarized as follows:

- Compensation in 1994 has conducted to four land owners, located in Sub-Regency of Membalong, for area covers about 1.53 ha, with total value of IDR 450,000.-.
- Compensation in 1995 has conducted to 54 land owners, located in Sub-Regency of Membalong, for area covers about 22.39 ha, with total value of IDR 13,738,500.-.

All compensation documents such as letter of affirmation (agreement), right extrication act, receipt of payment and picture documentation has signed by land owner(s), Head of Kembiri Village and Head of Membalong Sub-Regency (*Camal*), as government representative. All document mentioned has sighted and observed during re-certification assessment. Based on review of the above documents, it could be concluded that there is no previous land owner (personal) but government, as well as no land customary rights within POM-2 PT DSN and PT DAN operational areas.

##### 4.5.2

Formerly before planting, FPIC has conducted through several assessment that carried out by competent parties such as AMDAL, SIA and HCV. Those documents informed that FPIC process had conducted to surrounding villages such as

Village of Kembiri, Simpang Rusa, Membalong, Perpat, Lasar, Cerucuk and Pegantungan. Furthermore, it was informed that there were no land customary rights within unit of certification operational areas.

#### 4.5.3

There is supporting statement from surrounding communities regarding development of PT FLD for oil palm plantation, for example as shows through Statement Letter documents from the Head of Membalong Sub-Regency, Kembiri Village and Simpang Rusa Village dated 15 November 1991.

#### 4.5.4; 4.5.5 ; 4.5.6; 4.5.7 and 4.5.8

There is no issues related to land ownership and customary rights, as well as access to food and water for surrounding communities. Furthermore, there is no new planting and/or land expansion after 15 November 2018 in unit of certification operational areas.

Status: Comply

#### 4.6

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

##### 4.6.1

Procedure of FPIC and social conflict resolution is presented in document No. SOP/SMART/SENS-CSCR/SADV/002 and SOP/SPO/SMART/LH-04 dated 01 July 2010. Meanwhile, procedure for land compensation is presented in document No. SOP/NP/SMART/VII/D&L.002 dated 01 July 2010. Those procedures has covers process of identifying legal rights, customary or user rights and mechanism of people entitled to compensation identification. The scope of procedure is all activities related to the compensation process for land over the land right cultivated by the Company, the purpose is to ensure the area of plantation free from others right. Based on HCV, SIA and AMDAL review, it was known that there is no customary rights in PT FLD operational areas. Furthermore, all areas were located on APL status for plantation purposes. The Company has no new land acquisition and the entire compensation process was completed in 1995. The results of compensation documents verification and interview with communities and previous land owners is known that compensation process are done directed to the land owner and landowners are given the freedom to release their land without coercion. This fact has confirmed through consultation with representative from the Village of Kembiri and Cerucuk.

##### 4.6.2; 4.6.3 and 4.6.4

The unit of certification operational areas has free from communities mastery and customary rights. No land compensation needed.

Status: Comply

#### 4.7

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

##### 4.7.1 and 4.7.3

Up to ASA-1.1, it was known that there is no new land acquisition during 2018/2019 to 2019/January 2020. There is enclave area for about 174.79 ha as the owners are not willing to be compensated by the unit of certification. Land acquisition of PT FLD has conducted through compensation payment which had carried out in 1994 and 1995, as shows through compensation evidence for 58 community land units, summarized as follows:

- Compensation in 1994 has conducted to four land owners, located in Sub-Regency of Membalong, for area covers about 1.53 ha, with total value of IDR 450,000.-.
- Compensation in 1995 has conducted to 54 land owners, located in Sub-Regency of Membalong, for area covers about 22.39 ha, with total value of IDR 13,738,500.-.

All compensation documents such as letter of affirmation (agreement), right extrication act, receipt of payment and picture documentation has signed by land owner(s), Head of Kembiri Village and Head of Membalong Sub-Regency (*Camat*), as government representative. All document mentioned has sighted and observed during re-certification assessment.

##### Update on overlapped area (0.38 ha)

- Information of SHM of claimant No. 27. Kembiri dated 02 April 1987 and HGU of PT FLD No. 13 dated 05 December 2001.

- Participative field mapping and measurement activities picture documentation dated 24 February 2018 that conducted by inheritee and PT FLD representative. The map is presented in document No. 034/100/PLMO/02/18 dated 24 February 2018, with scale 1:5,000. Overlapped palms were identified and marked on the map (69 palms).
- Inheritee proposal of compensation letter dated 09 November 2018 value for IDR 95 millions has responded by PT FLD through Letter No. 012/FLD-D&L2/XI/2018 dated 14 November 2018 which informed that value of compensation proposed by company was IDR 20 millions only, without any compensations for plants above overlapped areas.
- Minutes of discussion with DPRD (Parliament) of Belitung Regency dated 29 January 2019, attended by 25 stakeholders, included government representatives. The meeting resulting that resolution shall be conducted through "*Musyawarah Mufakat*" or consensus.
- Minutes of mediation with Head Office Jakarta dated 08 March 2019 which informed that compensation is only accepted when refers to NJOP of Kembiri Village that totaling about IDR 26 millions. Minutes signed by Acting Head of Kembiri Village and Inheritee representative.
- Advocate/Lawyer Ariel Siva Legal Assistance & Law Office Letter No. 13/07-KAAS/VII/2019 dated 05 July 2019; No. 05/08-KAAS/VII/2019 dated 07 August 2019; and No. 17/08-KAAS/VII/2019 dated 22 August 2019. Those letters subjected on summation (*somas*) towards overlapped area covers 0.38 ha located in Division 7 Block L 47. Those letters had responded through Letter of TKME Manager No. 01/IX/2019 dated 02 September 2019 about completeness of inheritees/claimant relevant data towards overlapped areas. Coordination report towards this matters had delivered to Head Office in Jakarta via email dated 18 September 2019.
- Claim chronology dated 18 September 2019 prepared by D&L Staff and TKME Manager, which explained time line of claim where starts since 19 February 2018 for overlapped area covers 0.38 ha located in Division 7 Block L 47.
- Treatise (Risalah) of Meeting dated 04 February 2020 between two (2) PT FLD representatives, one (1) inheritee representative and two (2) witnesser from inheritees sides about proposal of compensation value of the overlapped areas in Division 7 Block L47 TKME totaling about IDR 75 millions. There were six (6) inheritees that legitimate by Ketua RT, Kadus Air Gede, Kepala Desa Kembiri and Camat Membalong. The value is delivered to Head Office in Jakarta for approval or rejection response through email dated 04 February 2020.
- Based on observation to overlapped area in Division 7 Block L47, it was known that the overlapped area and/or palms has marked with red cross paint and there is no indication of harvesting activities and/or other agronomy input on the particular field.

#### 4.7.2

Compensation is conducted through mediation directly with the affected parties, witnessed by related stakeholders such as Head of Village, Head of Sub-Regency and other government representatives. These mechanism conflict resolution is further explained in document No. SOP/SMART/SENS-CSCR/SADV/002 and No. SOP/SPO/SMART/LH-04 dated 01 July 2010, while for land compensation process is presented in document No. SOP/NP/SMART/VII/D&L.002 dated 01 July 2010. Example of compensation process is explained in Indicator 4.7.1.

**Status: Comply**

#### 4.8

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

##### 4.8.1; 4.8.2; 4.8.3 and 4.8.4

Occupation in operational areas covers 174.79 ha. These particular areas were located on TRSE land title in Block H07, J08, J09, K11, K12, L13, L14, M14, N09, M10 and P15. Currently the areas managed by communities, for example as observed to Division 1 Block M10 which found that the occupied area already planted with pepper. Occupation been exist before company takeover from PT Angkasa Puri. Agreement with occupants is presented in document No. 002/RC-BB/memo/IX/2014 dated 24 September 2014 which stated that there is no conflict that causing disturbance towards both parties. Up to surveillance 1.1, it was known that there is no conflict reported on the particular areas.

##### **Claim on ex Nursery area covers ± 102 ha**

Currently the particular areas where located in TKME is fully managed by the unit of certification. Society of Tanjung Rusa Village claim that the ex-nursery area was rented by the company in 1997. However evidence concerning the claim stated is un-demonstrable or proved the claimant. Mediation with Commission 2 of Belitung Parliament (DPRD), Head of Dusun, Head of Village, elders, Head of Regency, Police Resort, etc., had been carried out, as shows through minutes of meeting dated 21 January 2015, 23 December 2015, 30 December 2015, 24 May 2016, and 02 November 2016. Since legal

evidence(s) cannot be shown by claimant, the process is pending. Up to surveillance-1.1, it was known that there is no progress and any complaint from claimants. This matters is also confirmed to the BPN of Belitung Regency in 10 February 2020.

**Overlap SHM and HGU covers 0.38 ha**

- Information of SHM of claimant No. 27.Kembiri dated 02 April 1987 and HGU of PT FLD No. 13 dated 05 December 2001.
- Participative field mapping and measurement activities picture documentation dated 24 February 2018 that conducted by inheritee and PT FLD representative. The map is presented in document No. 034/100/PLMO/02/18 dated 24 February 2018, with scale 1:5,000. Overlapped palms were identified and marked on the map (69 palms).
- Inheritee proposal of compensation letter dated 09 November 2018 value for IDR 95 millions has responded by PT FLD through Letter No. 012/FLD-D&L2/XI/2018 dated 14 November 2018 which informed that value of compensation proposed by company was IDR 20 millions only, without any compensations for plants above overlapped areas.
- Minutes of discussion with DPRD (Parliament) of Belitung Regency dated 29 January 2019, attended by 25 stakeholders, included government representatives. The meeting resulting that resolution shall be conducted through "*Musyawarah Mufakat*" or consensus.
- Minutes of mediation with Head Office Jakarta dated 08 March 2019 which informed that compensation is only accepted when refers to NJOP of Kembiri Village that totaling about IDR 26 millions. Minutes signed by Acting Head of Kembiri Village and Inheritee representative.
- Advocate/Lawyer Ariel Siva Legal Assistance & Law Office Letter No. 13/07-KAAS/VII/2019 dated 05 July 2019; No. 05/08-KAAS/VII/2019 dated 07 August 2019; and No. 17/08-KAAS/VII/2019 dated 22 August 2019. Those letters subjected on summation (*somas*) towards overlapped area covers 0.38 ha located in Division 7 Block L 47. Those letters had responded through Letter of TKME Manager No. 01/IX/2019 dated 02 September 2019 about completeness of inheritees/claimant relevant data towards overlapped areas. Coordination report towards this matters had delivered to Head Office in Jakarta via email dated 18 September 2019.
- Claim chronology dated 18 September 2019 prepared by D&L Staff and TKME Manager, which explained time line of claim where starts since 19 February 2018 for overlapped area covers 0.38 ha located in Division 7 Block L 47.
- Treatise (Risalat) of Meeting dated 04 February 2020 between two (2) PT FLD representatives, one (1) inheritee representative and two (2) witnesser from inheritees sides about proposal of compensation value of the overlapped areas in Division 7 Block L47 TKME totaling about IDR 75 millions. There were six (6) inheritees that legitimate by Ketua RT, Kadus Air Gede, Kepala Desa Kembiri and Camat Membalong. The value is delivered to Head Office in Jakarta for approval or rejection response through email dated 04 February 2020.
- Based on observation to overlapped area in Division 7 Block L47, it was known that the overlapped area and/or palms has marked with red cross paint and there is no indication of harvesting activities and/or other agronomy input on the particular field.

<b>Status: Comply</b>
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**PRINCIPLE #5 SUPPORT SMALLHOLDER INCLUSION**
**5.1**

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

**5.1.1, 5.1.2, 5.1.3**

The company not received the FFB from independent smallholder, but scheme smallholder named Tanjung Rusa Plasma (TRSA) – Cooperative of Sawit Sejahtera Bersama. The pricing mechanisms for plasma, or local businesses are specified in the work agreement. For example the pricing of Tanjung Rusa Plasma – Cooperative of Sawit Sejahtera Bersama has been set in contractual agreement (No. 01/SPK/KSSB-FLD/06/2012 dated 1<sup>st</sup> June 2012, then addendum No. 001/KSSB/KB/07/2013 date 30<sup>th</sup> July 2013), that signed by both parties and Belitung Regent. In the contract, FFB is determined based on the monthly pricing of the Belitung Province Plantation Agency.

A monthly FFB pricing letter was available from the Plantation Agency. Interview with Plasma Official of Sawit Sejahtera Bersama Cooperative, known that pricing letter dissemination through online and attached in monthly payment documentation.

**5.1.4, 5.1.5**

The agreement of company with Tanjung Rusa Plasma (TRSA) – Cooperative of Sawit Sejahtera Bersama was signed since 1 June 2012. The agreement was signed by both parties (company and cooperative official) and independent representative that was Belitung Regent. Based on Indonesian regulation, the smallholder determination was set in government level (Officials of Village, Sub-District, Regency, and Province). The smallholders commonly represented by family head (commonly gentlemen).

Based on review of Plasma contractual agreement, as well as consultation with Cooperative Official, the agreement has been set and the Official has been understood the provision of financial, FFB pricing, management, management fee, loan, dispute, etc. The agreement has been made with legal, fair, transparent, and has a time frame, that was one oil palm cycle and can be extended if agreed by both party.

For other business services like local contractor, based on consultation with FFB transporter contractor was known that the work contracts has explained the pricing of each work unit. The parties have understood the provisions of work contracts, the contracts has been made fairly, transparently and legally. Payment of work has been done in a timely manner, in accordance with the provisions in the contracts.

#### **5.1.6**

Review of FFB Plasma Payment, Plasma Financial Report of 2019, and FFB transporter payment, as well as interview with Plasma Official and local contractor, it was known that FFB/unit price were are paid according to the provisions, and on date of payment was not exceed the further month. The financial report of Plasma has been covered detail of operational FFB received, FFB price, operational cost (upkeep, manuring, harvesting, transport, general cost, and management fee 5%), deduction, and balance of credit.

#### **5.1.7**

As observed to weighbridge, it was known that the Mill has two units of weighbridge with each capacity of 60 MT. Weighbridge calibration was conducted annually by Metrology Body of Trade Agency of Belitung Regency, as shown through Certificate of Calibration No. 020.a/SKHP/UPTMLPP-KUKMPTK/V/2019 and No. 020.b/SKHP/UPTMLPP-KUKMPTK/V/2019 of May 2019.

#### **5.1.8**

The company only have scheme smallholder (Plasma) in the supply chain, and didn't have independent smallholder that supply FBB to the Mill.

#### **5.1.9**

The complaint mechanism for Plasma refers to company's general complaint mechanism, that was Complaint and Grievance Procedure (No. SOP/SMART/SIGS-CSR/SADV/II/003) which explain handling of complaint and grievance from internal and external stakeholders. The procedure was made involve the consideration from various parties. This procedure has been disseminated to stakeholders on 11<sup>th</sup> – 12<sup>th</sup> April 2018 include Plasma Cooperative Official. Based on interview with Cooperative Official, the Official known the complaint mechanism, and until now never been submitted the written complaint to the company.

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

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

#### **5.2.1, 5.2.2, 5.2.3, 5.2.4**

The company has had scheme smallholder named Tanjung Rusa Plasma (TRSA) – Cooperative of Sawit Sejahtera Bersama, and not received FFB from independent smallholder. The plasma was managed in a fully managed system, bounded by contractual agreement No. 01/SPK/KSSB-FLD/06/2012 dated 1st June 2012, then addendum No. 001/KSSB/KB/07/2013 date 30th July 2013.

In the full managed system under Tanjung Rusa Estate, the company gives full support in the initial arrangement of Tanjung Rusa Plasma from financial, as an avalist, land title settlement, and plantation management and monitoring in accordance with own Estate procedures. The smallholders just received the FFB payment each month deducted by production costs



and management fees.

The Plasma workers also managed by the company, and has given proper training as the same as Estate workers, for instance given IPM and pesticide application training on 5 February 2020.

Based on consultation to the management and Plasma Cooperative Official, the Plasma planned to be RSPO certified in 2020. The Plasma Official gives full support to the certification if it would give a good effect to the smallholders.

### 5.2.5

The documentation of Plasma contractual agreement, monthly report include the payment, and other plasma related documentation can be accessed by any stakeholder in accordance to the information request procedure. The financial report of Plasma has been given to Plasma Cooperative covered detail of operational FFB received, FFB price, operational cost (upkeep, manuring, harvesting, transport, general cost, and management fee 5%), deduction, and balance of credit.

The updated status of Plasma has been reported semesterly to Plantation Agency through company's mandatory Plantation Business Development Report, as well as the certification status reported in section '1.10.2 Progress of Associated Smallholders and Outgrowers for Certifiable Standard' of this audit report.

**Status: Comply**

## PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS

### 6.1

#### Any form of discrimination is prohibited.

#### 6.1.1, 6.1.2 & 6.1.3

Unit certification have GAR Social Environment Policy dated September 2015 which explained that did not discriminate against gender, race or ethnicity, disability, sexual orientation, age, or belief. Based on the employee registration document, unit certification has provided equal opportunities and treatment in employment opportunities. This is evidenced by the diversity of ethnic accepted to work. The results of interviews with workers during field visits and interviews with labor unions and representatives of the Gender Committee also obtained information that there was no indication of acts of discrimination based on religion, ethnicity, gender and regional origin in the process of accepting work.

The results of the employment document review prove that certification unit does not discriminate and treat all workers equally, the following is evidence that can be shown by the company:

- The composition of workers consisting of various ethnic groups, religions, gender and workers' origins.
- Recruitment of workers based on the results of selection, performance appraisal, ability and expertise of workers. For example harvesting worker who have contract No. 040/FLD-TRSE/SK/11/2019 dated 26 November 2019 received based on the results of the selection of job application files, results of health checks and results of interviews. The worker also passed the test and has been accepted as permanent worker with orientation period of 3 until 26 February 2020.
- Worker placement and training are carried out in accordance with their expertise / type of work, such as prospective harvest workers are placed as harvest workers and receive regular harvest training.
- Women workers are given equal rights, wages and opportunities to get promotions with male workers of the same type of work, for example there are several maintenance foreman who are female workers.

These explanations can conclude that the company has treated all workers equally without discrimination based on gender, ethnicity, religion, health conditions or others.

#### 6.1.4

A pregnancy test for workers is carried out every month just to ensure that pregnant workers are not allowed to do work with chemicals, not as a basis for discriminating against these workers. If declared pregnant, the worker will be transferred to a safer job but still equal in terms of wages and other benefits, so that there is no discriminatory action. This is made clear by the results of interviews with women workers in the TKME and TRSE in spraying activities stating that female workers are required to have monthly pregnancy testing at the clinic to ensure that no female workers working with

chemicals are pregnant / breastfeeding and testing the pregnancy is not a discriminatory measure given by the certification unit.

#### 6.1.5

Gender committees have been formed and are still active until today in the certification unit which is chaired by the committee chairperson along with coordinators in several sections and there are representatives in each unit. The main objective of forming a gender committee is to provide a forum that can accommodate the aspirations / complaints of workers (especially women), as company partners in carrying out the activities of socialization related to gender and other policies related to workers' reproductive rights. In carrying out its activities this gender committee always collaborates with the labor union so that the socialization of matters related to women's rights can be conveyed properly and there is no discrimination in terms of gender. The workers also knew of the existence of the gender committee because it had been routinely socialized by its management, the last socialization related to the gender committee and the activity was carried out on 11 April 2019 which was attended by female workers and housing residents.

The results of interviews with women workers and representatives of the gender committee revealed that until now there were no reports / issues / complaints related to gender reported by the workers and at the moment the activities carried out were gender meetings during children healthcare (posyandu), women recitation weekly and others.

#### 6.1.6

Equal payment of wages has been made by certification unit properly, taking into account the ability, performance, expertise, length of work and other factors as a basis for remuneration. So that the payment of wages provided is in accordance with the burden / duties / types of work respectively. For example, care workers with Employee Number 09202 (male) and 06501 (female) who get wages in December 2019 and January 2020 whose value is above the minimum wage, but with different amounts based on years of service, ability, attendance and job performance (structure and scale wage).

<b>Status: Comply</b>
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### 6.2

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

#### 6.2.1

The certification unit has procedures related to recruitment, selection, employment, promotion, retirement and termination of employment which are generally described in the Collective Labor Agreement period 2019-2021 written in Bahasa. This Collective Labor Agreement explains the working conditions and rights / obligations of workers such as, recruitment, selection, transfer, promotion, performance appraisal, remuneration, discipline, overtime, and other provisions. The company regulation has been routinely disseminated by the certification unit to all employees, one example of the socialization that was carried out was on 28 January 2020 which was attended by 149 participants.

The certification unit did not have workers with contract status for daily worker (BHL), the current employee status is permanent workers who have Orientation Worker status (3 month orientation period), such as Regular Workers (below worker PT class 1-4) and Staff (above worker PT class). All the rights for each employment status has been distinguished. For workers with contract status (PKWT) they are still owned by the certification unit, but this status is only given to retirees who are rehired for a number of jobs such as security guards and drivers. The number of workers currently owned by the certification unit is 1,636 and 137 contractor workers.

The results of interviews with workers (harvesters, sprayers, fertilizers and mill operators) and union representatives know that workers have a sufficient understanding of their rights (wages, overtime, incentives, fines, etc.) listed in the Company Regulations and in accordance with routine socialization provided by the certification unit. Workers' wages in 2019 & 2020 have been above the minimum wage set by the government and there are no late payments every month.

A review of the December 2019 & January 2020 wage document for harvest workers, pesticides, sprayers and mill operators proves that the wages received are above the minimum wage and in accordance with the wage scale structure determined by the certification unit for 2019 & 2020. For example, workers wages with the Employee Number 20082 (PT class 1) and 20051 (PT class 3) have a different based on wage scale structure 2019/2020. For the contractor workers,



based on the review on January 2020 wage document and interview with contactors, it has been proved that the wages received are above the minimum wage.

Based on the above explanation it can be concluded that the workers have understood the work requirements that have been socialized by the certification unit in an understandable language.

#### **6.2.2 & 6.2.3**

The certification unit has Collective Labor Agreement are made in a Bahasa that explains the working conditions and rights / obligations of workers such as recruitment, selection, transfer, promotion, performance appraisal, remuneration, discipline, deduction, overtime, sick leaves, holiday entitlement, maternity leave and other provisions. In addition to being generally stated in Company Regulations, the certification unit also has a decree, policy, memorandum and work contract for workers in orientation period that specifically explain these matters. An example is:

- Decree of the Board of Directors No. 216/CEOLAMBABEL/HRPSSUMSEL-LAMBABEL/12/2019 concerning Minimum Wage Determination & Wage Scale Structure in 2020 is Rp. 3,230.5224 / month (minimum) determined based on Kepulauan Bangka Belitung Minimum Wage Determination in 2020.
- Decree of the Board of Directors No. 359/CEOLAMBABEL/HRPSSUMSEL-LAMBABEL/11/2011 concerning Minimum Wage Determination & Wage Scale Structure in 2019 is Rp. 2,977.205 / month (minimum) determined based on Kepulauan Bangka Belitung Minimum Wage Determination in 2019.
- Employment contract for five (5) contract workers (PKWT), which explains the hours of work, wages, BPJS, leave, overtime, and others.
- December 2019 and January 2020 salary slips for workers with the Employee Number 20082 (PT class 1) and 20051 (PT class 3), who have a breakdown of wages in the form of basic wages, benefits, overtime, incentives, fines, and others.
- Overtime payment in December 2019 & January 2020 that has been accordance with applicable laws for workers with Employee Number 20082 (Process Foreman) and 20051 (security).
- List of women workers that has been given maternity leave and pregnant workers in 2019.
- Etc.

The results of interviews with workers (harvesters, sprayers, fertilizers and mill operators) and union representatives know that workers have a sufficient understanding of their rights (wages, overtime, incentives, deductive, fines, etc.) listed in the Collective Labor Agreement and in accordance with routine socialization provided by the certification unit. Workers' wages in 2019 & 2020 have been above the minimum wage set by the government and there are no late payments every month, working hours is seven (7) hour a day with 6 days in a week and for the overtime has been paid in accordance with applicable regulations.

A review of the December 2019 & January 2020 wage document for harvest workers, pesticides, sprayers and mill operators proves that the wages received are above the minimum wage and in accordance with the wage scale structure determined by the certification unit for 2019. For example workers' wages with the Employee Number 20082 (PT class 1) and 20051 (PT class 3) have a different based on wage scale structure 2019/2020.

Based on these explanations, it can be concluded that the certification unit has carried out work requirements in accordance with applicable laws and regulations in Indonesia.

#### **6.2.4**

The certification unit has provided welfare facilities to occupants in the form of housing, clinics, water supply, electricity, education, transportation and other facilities. The results of the field visit in the housing area revealed that workers were provided with adequate housing facilities with 2 bedrooms, 1 bathroom and there were daycare for children. The house is inhabited by 1 family and specifically for workers who are not married then 1 house will be filled by 2 workers. This is in line with the results of interviews with housing residents stating that the facilities provided by the certification unit are houses, electricity, availability of clean water, transportation of school, elementary & middle school (for high schools located in Membalong - 30 minute travel), child daycare, places of worship (mosque & church), sport facilities and others. In general, the facilities provided by the certification unit are good / suitable for use by workers and their families.

**6.2.5**

Certification unit 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 workers' housing area. In addition there are also workers who open small business stalls to sell daily necessities in each housing.

Based on interviews with workers (harvesters, sprayers, maintenance and mill operators), housing residents, labor 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 the existence of vegetable sellers given access to sell at home. In addition, workers can buy these needs into markets around the area of the company with less difficult access.

**6.2.6**

In Indonesia no living wage standard is established, so certification unit still implemented the national minimum wages for all workers. In addition to the payment of minimum wages, certification unit has been conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the certification unit aligned with the RSPO Guidance for Implementing a Decent Living Wage. The certification unit has the determination of assessment prevailing wage and all kind of benefits for DLW simulation in 2020 has been included in the calculation of main wage, worker status, housing facility, education, electricity, water sources, healthcare and others. The results of these calculations are known that the standard of DLW currently given / simulated by the certification unit is above the stipulation of the minimum wage with scale of minimum 11% and maximum 26.3%. Implementation of the simulation will be carried out in stages in 2020 while awaiting the adoption of the RSPO DLW benchmark for Indonesia.

**6.2.7**

The certification unit did not have workers with contract status for daily worker (BHL), the current employee status is permanent workers who have Orientation Worker status (3 month orientation period), such as Regular Workers (below worker PT class 1-4) and Staff (above worker PT class). All the rights for each employment status has been distinguished. For workers with contract status (PKWT) they are still owned by the certification unit, but this status is only given to retirees who are rehired for a number of jobs such as security guards and drivers. The number of workers currently owned by the certification unit is 1,636 and 137 contractor workers.

The results of interviews with spray workers, harvester and mill operators' found that workers understood the recruitment system, the status of workers and the orientation period that had to be passed before the worker was appointed as a permanent worker. These processes are stated to be fair enough and provide equal opportunities to work according to the abilities, expertise and achievements of the workers during the orientation period.

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

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

**6.3.1**

In the Circular Letter No. 094/CEO2-SE/12/2010 on December 14<sup>th</sup>, 2010 there is a statement of recognition of freedom of association. The document is published in Bahasa which can be understood by all employees. In addition, the certification unit has a Collective Labor Agreement which states that employees have the right to establish trade unions and become members / leaders of trade unions in accordance with applicable regulations. The information on freedom of association listed in the Collective Labor Agreement was carried out regularly and the last socialization was held on 28 January 2020.

Based on interviews with labor union representatives who explained that the company had given freedom of association and at present labor unions have been formed. The establishment of the union is in accordance with the applicable laws and regulations and has been recorded at the Manpower Office. Certification unit is giving freedom for worker to express their opinion. And also, certification unit did not give any intervention related to labor union activity. Labor union has registered to Manpower Agency of Belitung Regency.

**6.3.2**

The certification unit has a list of workers who have joined the union and the last update was carried out in February 2020, totaling 1,151 workers. In addition to properly documenting the list of members, the certification unit also has records of meetings between trade unions and management representatives as well as with internal unions. The following are examples of records of meetings conducted by labour unions in 2019, namely:

- The meeting between the union and company management on 06 December 2019 discussion about PPE compliance for contractor workers attended by 6 participants.
- The meeting between the union and company management on 08 November 2019 to discuss the pruning activity that must be done with harvesting attended by 6 participants.

### 6.3.3

The absence of company interference in the selection or operation of labor union activities, this is evidenced by the results of interviews with workers and union representatives stating that in the process of selecting / making decisions and planning activities, members provide input / aspirations to their representatives each to make an election / decision-making and no management has a position as staff / managerial (assistant and above). The employee who currently serves as the Chairman of the Labor Union is Maintenance Foreman at TRSE. The explanation has reinforced the fact that management did not interfere directly / indirectly with the taking decisions and activities carried out by labor unions.

**Status: Comply**

## 6.4

**Children are not employed or exploited.**

### 6.4.1, 6.4.2, 6.4.3 & 6.4.4

Certification unit has policy regarding the age requirements of workers is contained in Collective Labor Agreement states that the requirement for accepting workers is at least 18 years old. Policies regarding the age of workers are also available in GAR Social Environment Policy concerning which states that it is forbidden to employ child labor and under the age of 18 (eighteen) years, this is evidenced by the Identity Card (KTP) at the time of employee recruitment. The results of the verification of documents revealed that there were no workers under the age of 18. In addition to having a policy governing the minimum age for workers for workers, the certification unit also includes clauses on child protection and prohibitions on hiring workers under the age of 18 in any agreement with the contractor. The policy was socialized to workers on 28 January 2020 and to the contractor when signing the work agreement.

Based on field visits and interviews with workers in the fields of TKME, TKMM & TRSE, it is known that the minimum age for work is 18 years, and no workers found below the minimum age specified. This is supported by the results of a review of company and contractor workers' document which proves that there are no workers under the age of 18 at the time of entering work, the youngest age of workers is 18 years 2 months when entering work.

**Status: Comply**

## 6.5

**There is no harassment or abuse in the workplace, and reproductive rights are protected.**

### 6.5.1 & 6.5.2

The certification unit has a Circular Letter No. 003 / CEO2-SE / 01/2011 dated January 10<sup>th</sup>, 2011, which explains that the company prevents sexual harassment and how it is handled. Policies regarding the sexual harassment and violence are also available in GAR Social Environment Policy. It explains that every worker is entitled to receive protection against sexual harassment in the workplace and Sexual harassment is an offense and if convicted of sexual abuse offenders will be penalized in accordance with applicable regulations. The committee gender & certification unit has socialized to the employees, for example on 28 January 2020 and the representatives of the committee gender are available in each division.

Based on interview with workers and committee gender, the policy had disseminated to workers through gender committee meetings with workers and in the last year period, that hasn't any issue/incident related to sexual harassment, violence at work/reproductive rights.

### 6.5.3

The certification unit has Policy No. KHI-SMART/005-00 dated 01 August 2017 concerning Pregnant and Breastfeeding Women Workers. The policy explains about giving mothers special time to breastfeed their children, prohibiting pregnant

/ breastfeeding women workers from working with chemicals, providing light work / which does not endanger the mother / obstetric / child, and providing a special room for breastfeeding her child.

For now, the certification unit has recorded employees who have experienced pregnancy conditions in each unit by recapitulating the total number of female workers who were pregnant in 2019 as many as 6 workers, 19 breastfeeding worker and all of them were confirmed not to work in chemical-related work.

Based on interviews with women workers and gender committee representatives, it is known that the certification unit has provided a special place for breastfeeding at child daycare with special time to breastfeed. There is no prohibition from supervisors in the field related to this matter and specifically workers in the field who do not bring a vehicle will be delivered / picked up by the foreman at these times.

The certification unit has specifically provided the need for new mother or breastfeeding workers to breastfeed by setting a special time for breastfeeding at work, the availability of a special room for breastfeeding and other supporting facilities.

#### 6.5.4

Complaint mechanism of workers was contained in Procedure No. SOP/SMART/SIGS-CSR/SADV/II/003, valid date 01 July 2014. The procedure aims to accommodate complaints and grievance from employees. In the procedure described that if requested, the company guarantees the confidentiality of the reporting identity and the disclosure of disgrace or incident (whistleblower).

The results of interviews workers for example spraying teams, warehouse officers, and weighbridge are known to be aware of the grievance mechanism. Related complaints of sexual harassment (women's issues) can be submitted to the gender committee. In the last year period, that hasn't any complaint related to sexual harassment, violence at work/reproductive rights.

**Status: Comply**

#### 6.6

**No forms of forced or trafficked labour are used.**

##### 6.6.1 & 6.6.2

The certification unit have policy related prohibits forced or bonded labor or debt bondage and take steps to prevent it. The procedures related to human resources management shows that every worker has a work agreement that describe specific job description. Based on employee list in 2019 and observation in field known that there is no migrant workers, forced labor. Every worker has a work agreement that describe specific job description, there is no substitution of contract without prior consultation and agreement from the worker.

Based on employee data and interview with workers, most of the workers came from local communities. They have the recruitment process in the company and is in accordance with applicable employee acceptance procedures.

There is no significant obstacles related to employment or violations of company regulations. For example, for the harvesters works daily based in 7 working hours. Certification unit provides output targets that can be obtained in less than 7 hours of work. If the harvester obtains more output within or more than 7 working hours, then the harvester will get the harvest premium payment. No penalty is given to the harvester if it does not get output due to natural factors such as rain. Based on payment list, the harvesters have earned above the minimum wage.

**Status: Comply**

#### 6.7

**The unit of certification ensures that the working environment under its control is safe and without undue risk to health.**

##### 6.7.1

The certification unit have persons that responsible for the OHS program within the organizational structure of Committee of Occupational Health and Safety (P2K3) established in each management unit. The P2K3 team has received approval from the Head of Manpower and Transmigration of the Province of Kepulauan Bangka Belitung and the P2K3 secretary is a certified occupational health and safety expert.

OHS committee routinely conducts monthly meetings on OHS issues in the workplace. The documentation of the meeting

was recorded and stored well. Based on interviews to workers who are members of the P2K3 organization it is known that monthly meetings are always routinely conducted to discuss about OHS such as consistency of PPE usage, work accident analysis, report, firefighting simulation, checking of emergency response equipment, OHS sign board, safety patrol, etc. The last meeting has been held in 27 December 2019.

**6.7.2**

Emergency Preparedness and Response Procedures (SOP/SMART/UMUM/SADV/II/005), Management of Accidents and Occupational Diseases Procedure (SOP/SMART/HESS-EHSD/SADV/II/005) has been ratified by certification unit. In that procedure has explained the handling of accidents from reporting to coordination. Simulation was performed regularly to ensure the preparedness of emergency response equipment in the certification unit. The simulation was performed on hydrants located in the mill and water pump in TKME, the result of the simulation was concluded that the emergency tool that certification unit have is ready for use. The routinely emergency simulation that has been conducted by certification unit in 03 August 2019 and have 85 participants. Based on observation in office, mill and housing complex, certification unit has evacuation route and gathering point that has been marked with arrow sign inside and outside the location.

The last first aid training has been conducted in 02 March 2019 and certification unit has licensed first aid officers. Certification unit also has a first aid box in each unit and based on observations, it's concluded that the contents in the first aid box are sufficient (21 items). There is also a checklist of observations of the contents of first aid boxes routinely performed every month by first aid officers.

There were one (1) work accidents in TKMM without lost time accident and there is zero accidents in TKME/TRSE. All work accidents have been reported to *BPJS* and the Labor Agency.

**6.7.3**

Based on documents verification and interviews, it is known that all operators at TKME, TRSE and TKMM already have license/certificate for boiler operators, lift carrier operators, welders and electrical technician. The management unit has had the training plan for every worker that has been exposed high danger level work such as all mill process operators. For example, engine room operators that has been exposed to high noise levels such as training of procedure, socialization of HIRAC and safety briefing before work.

Based on observation and interviews with workers, the certification unit has provided PPE to every worker. PPE for type of glove, ear plug, ear muff, helmet, apron, goggles and safety shoes can be replaced immediately if damaged. This is evidenced by shown the recording of PPE distribution documents to the workers and the workers recognition from interviews also confirmed it. For examples provided PPE for pesticide operators such as apron, boots, goggles, glove, respirator and others. The company has an opportunity to ensure the availability of PPE safety shoe stock has been adjusted to the size of the worker (OFI).

**6.7.4**

Certification unit have Collective Labor Agreement that describe about workers have the right to receive medical care and be protected by the accident insurance company. The management unit show proof of payment of BPJS. Payments are made every month by percentage according to the regulation. The last payment that has been paid by certification unit is on 07 February 2020 for BPJS period of January 2020.

Based on the interview with TKME, TRSE & TKMM workers, concluded that all employees were aware of the medical service procedures in the event of an accident or illness. All employees interviewed also claimed to have a health BPJS card, if they went to a company clinic there was no fee at all. Based on interview with contractor representative, it is known that the accident insurance for contractor's workers is covered by the head of contractor itself.

**6.7.5**

The company is still consistent in monitoring the recording of occupational accidents by calculating the lost time accident (LTA). Recapitulation of work accidents with a formula to find the level of severity and frequency of accidents. This document informs the time period, the number of working days, the number of no effective working days, overtime, hours of work in total, the number of accidents, the number of working days lost, hours of work a year, the number of accidents a year, lost days a year. Calculation of Severity Rate and Frequency Rate is reviewed regularly and monitoring will be evaluated at the monthly meeting of Committee of Occupational Health and Safety. For examples in period of 2019



certification unit have 1 incidents, zero lost time, Severity Rate and Frequency Rate is zero.

**Status: Comply**

**PRINCIPLE #7 PROTECT, CONSERVE AND ENHANCE ECOSYSTEMS AND THE ENVIRONMENT**

**7.1**

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

**7.1.1**

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

The company has a good commitment to improve the use of pest natural predator as part of integrated pest control. One of natural predator development is the reproduction and the construction of barn owl box as a mechanism to control rat. It monitoring barn owl box occupation at least once a month. The monitored parameter is the existing of barn owl in the boxes, left food, and sign of reproduction such as egg or owl. Currently, there are total 818 barn owl boxes in PT FLD and inhabited 720 barn owl boxes.

**7.1.2**

Based on document review and field observation, the company implement some biological control practices to suppress pest and diseases infestation such as white buttercup flower (*Turnera subulata*) and barn owl (*Tyto alba*). Verification result on website of cabi.org known that those species stated as not invasive in Indonesia.

**7.1.3**

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

**Status: Comply**

**7.2**

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

**7.2.1**

The company has SOP and work instruction on weeds management, the guidance covering about chosen, storage, application, contaminated handling, known about signs and symptoms of pesticides poison and first aid for poison case. To ensure pesticide used are in accordance with the target, company conducted identification the type of weed found in operational area. Based on field visit and interviews with 2 pesticide applicators in Block K47 Division 6 TKME and 4 pesticide applicators in Block K11 TRSE, it was concluded that workers knew about the function of the chemical used and selective when doing the spraying activity, as for example for glyphosate material used to spray the circle and harvesting path only while the weeds in inter row not sprayed. The company used Isopropil amina glyphosate and Metil metsulfuron which have received permission from the government. Based on document verification and observation to pesticide storage, there is no prohibited chemicals use.

**7.2.2**

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



**7.2.3 and 7.2.4**

The Company has program to reduce the pesticide usage by replacing pesticides with biological controls such as using natural predators to control rat and planting the beneficial plant. Based on document review and field observation, several IPM program with biological approach that has been implemented such as rat control by *Tyto alba*, and leaf eater caterpillar by planting beneficial plant such as *Turnera subulata* and *Casia cobanensis*. Moreover, it has also conducted early detection routinely listed in the monthly report of early warning system. There is no prophylactic use. In 2019, the company does not use pesticide for pest control at all. Based on the results of field visits on spray activities in block K47 TKME and block K11 TRSE, application of prevention is not known, but it is done selectively.

**7.2.5**

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

**7.2.6**

The results of field observation in warehouse and interview with pesticide applicator in block K47 TKME and block K11 TRSE, it is known that the employees have been given regular training in safe work practices. This was evidenced by the employee can demonstrate the correct way to work in accordance with the procedures including how use and handling the risks in accordance with material safety sheets. There have been sheets of safety work (MSDS) and the symbols of hazardous and toxic materials are properly installed on the walls and doors of warehouse. The pesticide applicator also using personal protective equipment in accordance with specified hazard identification and material safety data sheet such as respirator mask, gloves, safety shoes, apron and googles. In addition, employees are also informed about the steps of secure work in each roll call in the morning before work. Meanwhile, the spraying workers interviewed also claimed that after spraying they will be washing up and drying up the PPE and spraying tools (sprayer tank, jerry, etc), and taking shower/changing clothes in special place near pesticide store of the division office. Therefore, based on field observation to mixing area in TKME and TRSE, that known there are storage for keeping all PPE's and spraying tools after use.

The company can show the integrated pest control training, integrated weed control and fertilizer training events which will be held on January 12, 2019 in the TKME meeting room and will be attended by 67 participants. Based on document verification and interviews conducted with spray workers in the TKME and TRSE, it was concluded that those who applied the chemical spray application were employees who had attended the training, while the employees understood the dangers and risks related to the chemicals used.

**7.2.7**

The company has had SOP Waste Management (document No. SOP/SMART/LEMS-EHSD/SADV/I/002). The procedures related to management of agrochemical ex-container comprising of collecting, washing, recording, documenting, storage, returned to vendor, and rinse water usage. The Company also has SOP of Plant Upkeep (SOP/SMART/MCAR/XII/TA-PTM), authorized on 12 June 2012. In the SOP also explained about the storage of pesticides.

Based on field observations to chemical warehouse in TKME and TRSE; there are MSDS and it was available also pesticide mixing places, PPE washing basin and spray equipment, water trap (tub to hold water used for washing), water tap, storage room for APD, the appropriate ventilation, bathrooms, sedimentation basin, and water tank.

TKME: Has good ventilation / air circulation, there are symbols, for example danger symbols, pesticide spills and reservoirs. There are stockpiles of pesticides arranged neatly on a shelf, Roll Up 1,860 liters, Kao Adjuvan 100 liters, Garlon Mix 296 liters, Starane 184.5 liters, Erkaforon 169 kg, Agristik 75 liters.

TRSE: Has pesticide spill channels and reservoirs, IK Gudang Agrochemicals and MSDS for each pesticide product, good air circulation (ventilation and exhaust fan that function properly). There are pesticide stocks arranged on shelves according to the trademark and MSDSn, namely Roll Up 2100 ltr, erkaforon 157 kg, sterane 181 ltr, 240 ltr garlon mix.

**7.2.8**

Ex pesticide containers is washed for 3 times (refer to MSDS) and the water used to wash it shall be used for spraying. Washing of fertilizer plastic bags was carried out by soaking for 30 minutes and the used water was used for splashing into oil palm plants or plants in the yard. Based on SOP of Waste Management No. The SOP/SPO/SMART/LH-09, dated 01 July 2010 on point 6.3.b explained that the washed pesticide ex-containers are returned to vendor.

Working stages of Washing and Cleaning Work of Ex Pesticides and Fertilizer Bags in accordance with the Working Instruction of Washing and Cleaning of pesticides ex-containers and bags of fertilizers No. IK/SPO/SMART/LH-09/01 authorized on 01 July 2010 where the container was washed thoroughly (3 times for pesticide ex-container and 1 wash for the fertilizer bags), the used water of hazardous waste did not overflow and pollute the ground water. The washed pesticide ex-containers are marked and stored separately, while the washed fertilizer bags are immediately dried and stored in the warehouse.

The technical handling of agrochemical packaging was explained at the spray worker training held on February 5, 2020 at the TKME meeting room and attended by 55 participants. January 9, 2019 at TRSE was attended by 53 participants.

Based on field visit at the Hazardous Waste Temporary warehouse and employee housing, it was found that all pesticide ex-containers have been stored in the Hazardous Waste Temporary Store Based The spraying team interviewed at TKME (Block K47) and TRSE (Block K11) claimed that handling of pesticide ex-containers has been done in accordance with established procedures. The ex-container of agrochemical can not be taken home or other used. The pesticide ex-containers are shipped entirely to licensed Hazardous Waste carrier company. The Company shows the Hazardous Waste Manifest from PT Valten Cahaya Anugerah, dated 5 Februari 2020, among others contaminated ex-containers of 0.3112 ton.

**7.2.9**

Based on a review of documents and interviews with management staff, the company did not perform the application of pesticides from the air.

**7.2.10**

The certification unit regularly have a medical examination for pesticide operator. TKME, TRSE & TKMM has a list of the latest pesticide operator as many as 49 workers. All spraying workers has examined health through inspection types of medical checkup, cholinesterase and spirometry, to ascertain the condition of workers in good health. This semester examination was conducted in 15-27 January 2020 for all units. Examination results stating that all workers spray is in a healthy condition. Auditor conduct interviews with spraying workers in TKME & TRSE and they admit that they have not been exposed to skin disease and itches because they always use PPE while working.

**7.2.11**

During the audit, the pesticide application conducted in TKME & TRSE to control weeds in the circle and path. However, the auditor also interviewed the pesticide operator in TKME & TRSE that transferred to manual upkeep activities. Based on field observation and interview, known that there was no worker age under 18 years old that worked in chemical activity. The pregnant and breastfeeding women prohibited to work in chemical. The monitoring conducted through monthly pregnancy test. If founded expectant mother, she will be transferred to light non chemical activity.

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

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

**7.3.1**

The company shown evidences that the waste has been identified based on toxicity and hazardous characteristics, and then managed in accordance with waste management procedure and government regulation. The waste identification and management plan stipulated in document of Waste Source Identification and Management.

Has been identified the source of waste and pollution from Mill and Estates. For instance, engine room produce emission from generator, sterilizer station produce solid waste and scattered loose fruit, chemical storage produce solid waste, such

as ex chemical container, etc. The management plan has include the strategy for reduced, reuse, recycled, and disposed off the waste. Each waste management strategy has been documented, the regular mandatory report related waste management has been submitted to Environmental Agency, latest on 16<sup>th</sup> January 2020, such as Report of POME Land Application and Report of Hazardous Waste Management.

### 7.3.2

Has been verified based on document review, interview, and field observation, that the waste management and disposal has been well understood and managed by the Staff and workers in accordance with the related procedures. Among others the reduce if pesticide container in line with Integrated Pest Management (IPM), reuse the solution of sprayer and PPE rinse, reuse the shell and fibre for the boiler fuel, recycle the organic and inorganic domestic waste through landfill, recycle the POME through POME Land Application as nutrient cycle, recycle the EFB through EFB mulching application as nutrient cycle, disposed off the hazardous/infectious waste to the licensed storage and vendor.

The regulatory provision related waste management has been complied by management. The licensed hazardous waste storage provided in each Estates and Mill, permitted based on Decree of Investment, Services and Industry Agency No. 188.46/002/KEP/LB3/DPMPSTPP/2017 dated 23<sup>rd</sup> November 2017, valid for 5 years. The company submitted the proposal of license revision, to cover the infectious waste. Nowadays, issued Technical Recommendation dated 20<sup>th</sup> January 2020 from Environmental Agency.

Currently, the infectious waste was still managed by Bakti Timah Hospital with agreement letter No. 32/SP-RSBT-PS.PT.FLD/VI/2019 dated 3<sup>rd</sup> June 2019, valid for one year. The latest handover of infectious waste is documented on minutes of meeting infectious handover on 11<sup>th</sup> January 2019 as much as 4.0 kg (injection needle, expired drugs, etc).

The other hazardous waste was collected by licensed hazardous waste transporter, that was PT Valten Cahaya Anugerah based on contractual agreement No. 210/EPMD/SPK-Pengelolaan LB3/FLD-VCA/XII/2019 dated 16<sup>th</sup> December 2019, valid until 14<sup>th</sup> January 2022. PT Valten Cahaya Anugerah has had hazardous waste transporter license from License and Investment Agency No. 503/21/SIPL-B3/BP2TPM/2016 dated 26<sup>th</sup> February 2016, valid for five years.

Documentation of hazardous waste transporting was in form of official report of handover and manifest. The latest handover of hazardous waste was on 5<sup>th</sup> February 2020. The documentation includes delivering letter, appointment letter, vehicle identification, hazardous waste manifest, official waste manifest from Environmental Agency named *fastronic*.

Other than that, the POME Land Application has been licensed by Decree of Environmental Agency No. 188.46/001/KEP/IPAL/DPMPSTPP/2019 dated 11<sup>th</sup> October 2019. The area covers of 20 Blocks (439.9 ha).

### 7.3.3

Based on review of waste management procedure, field observation, and stakeholder consultation, known that the Company did not use open burning for waste disposal.

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

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

### 7.4.1

The company has SOP of Manuring (SOP/SMART/MCAR/IX/TA-PPK) to maintain soil fertility. The SOP approved by SMD Ops on 12 June 2012. The company has implemented practices to optimize production results in accordance with established procedures, including:

1. Routine soil and leaf sampling by SMARTRI to ensure the elements needed by plants to be able to produce optimally. The results of soil and leaf analysis tested will be the basis for determining the dose of fertilizer in each garden.
2. Fertilizing activities that prioritize the principles of being on time, on target, on the right dosage and on application. In addition, marginal (sandy) soils are given extra fertilization in the form of empty bunch at a dose of 40 tons / Ha.

3. Application of palm oil liquid waste (POME) to improve soil fertility. There is an application area of 299.63 hectares out of a total of 439.9 hectares of the area indicated in the permit with 45,326 active flat beds. The total discharge of liquid waste applied during January - December 2019 was 274,854 m<sup>3</sup>.
4. Maintenance of ground cover plants to reduce evaporation (maintain soil moisture). For example, planting legumes (*Mucuna bracteata*) and maintenance of soft fern (*Nephrolepis bisserata*). To all spraying employees are always conveyed at the morning apple to not spray the plant.
5. The company's commitment to no longer use herbicide-based active ingredients since 2016. Based on the information from managers and staff, this is to show the company's commitment to support RSPO guidelines on reducing / not using herbicide groups 1A and 1B as well as parcels.
6. monitoring of the implementation of SOPs, among others, is carried out through an internal audit mechanism conducted by the OIA Department every semester.

TKME and TRSE can show documents on the realization of an organic fertilization and EFB applications for 2019. The auditor conducted an interview with the fertilizer loading workers at Division 2 TRSE. Fertilization is done mechanically using a spreader machine. Workers can also explain the fertilization procedure well, which is in accordance with the dosage determined based on the recommendations.

#### 7.4.2

The company has routinely monitored the changes on the nutrient status based on the regular soil sampling unit (SSU) and leaf sampling unit (LSU) analysis to determine fertilizers recommendation. The sampling spot has been determined in each division and block routinely by SMART Research Institute (SMARTRI) and it's supported by well-trained census officer in each estate. SSU is conducted every 5 year for trees with age of 3, 8, 18 and 23, meanwhile LSU is conducted annually. The last LSU result was issued on 20 December 2020 and the last SSU result was issued on November 2014. Visual observations performed every year at the time of leaf analysis activities. Visual observation is a consideration in determining the fertilizer recommendations, deficiency of nutrients and analyze the potential of disease which is likely to become endemic of a particular disease.

#### 7.4.3

The company has a strategy of recycling nutrients, such as the use of the frond (pruning), application of effluent and EFB Mulching. It shows a recording of the EFB applications realization in 2019 on TKME and TRSE. Overall, the company has made efforts to maintain and improve soil fertility. In addition, the company can show data on palm oil mill effluent (POME) applications to improve soil fertility. There is an application area of 439.9 Ha. The company also utilizes liquid waste (POME) in the TKME area of 439.9 Ha. The total discharge of liquid waste applied during January - December 2019 was 274,854 m<sup>3</sup>. Visually, there is no symptom of nutrient deficiency at the blocks that have been visited. Until the recertification, the company has not carried out replanting activities, so there was no use of the palm residue after replanting.

#### 7.4.4

Tanjung Kembiri Estate dan Tanjung Rusa Estate shown the plan and the realization of fertilization for period January to December 2019. Based on document review and interview with the staff, the realization of fertilization in both estates reach 100% completed according to the program.

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

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

#### 7.5.1

The company has a soil suitability map report issued by Plantation Monitoring and Planning Division year 2006 which included a description of the soil types, topography, soil texture, drainage condition, land suitability level, and the limiting factor. The map is available on a 1: 50,000 scale. Soil types in PT FLD such as typic endoaquept, typic dystrodept, typic hapludults, typic haplorthods, and typic udiccamments. This type has a texture of sandy and sandy clay with land suitability values in the S2 and S3 classes. The limiting factors are soil texture, drainage, topography, and rocks in the root zone.

The strategy made by the company to optimize the potential of the land with the limiting factor is by providing extra organic fertilizer (empty fruit bunch) at a dose of 40 tons/ha.

Auditor conducted field observations in the EFB application area in block H51 TKME and block K8 TRSE and it can be concluded that the company has implemented a management strategy to optimize the potential of the land with the limiting factor by providing EFB.

#### **7.5.2, 7.5.3**

Based on the PT FLD area statement, it is known that the youngest planting year was in 1998. There was no new planting since previous assessment (Recertification) until audit ASA 1.1.

**Status: Comply**

#### **7.6**

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

#### **7.6.1, 7.6.2, 7.6.3**

Based on the PT FLD area statement, it is known that the youngest planting year was in 1998. There was no new planting since previous assessment (Recertification) until audit ASA 1.1.

**Status: Comply**

#### **7.7**

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

#### **7.7.1, 7.7.2, 7.7.3, 7.7.4, 7.7.5, 7.7.6 & 7.7.7.**

The company has a soil suitability map report issued by Plantation Monitoring and Planning Division year 2006 which included a description of the soil types, topography, soil texture, drainage condition, land suitability level, and the limiting factor. The map is available on a 1: 50,000 scale. Soil types in PT FLD such as typic endoaquept, typic dystrodept, typic hapludults, typic haplorthods, and typic udicamsments. This type has a texture of sandy and sandy clay with land suitability values in the S2 and S3 classes. The limiting factors are soil texture, drainage, topography, and rocks in the root zone. According to semi detail soil survey report, there is no peat indicated in all company operational area. Hence, no peat management that planned.

**Status: Comply**

#### **7.8**

**Practices maintain the quality and availability of surface and groundwater**

#### **7.8.1, 7.8.2**

Water source management and monitoring plans has been set in the SOP of Water Source Management and Monitoring (No. SOP/SMART/BCOS-EHSD/SADV/I/004) and in the semesterly Environmental Management and Monitoring Plan (RKL/RPL). Sighted the map of rivers, wet streams and wetlands with a scale of 1: 50000 (TRSE) and scale of 1: 55000 (TKME), consisting of Cerucuk river, Kembiri river, water spring of Muyang, Air Gede river, Kepang river, Mengkuang river and Aik Mudur river. All of them set as HCV area, where some management standar were higher than 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves', and not less than Indonesian regulation, for instance in the aspect of riparian wide was set 50 m for all rivers.

Evidence of implementation has been verified by document and on field observation. For instance, installation of warning sign and boundary marking of chemical spray, and planting of vetiver grass and woody plants for erosion control, as sighted in riparian of Aik Mundur River (TKME). Other than that as water quality monitoring, semesterly conducted water testing in the upstream and downstream of the river by an accredited laboratory. However during observation in Aik Mundur River, several boundary marking has been faded and invisible, the company has an opportunity for improvement to ensure the riparian border marking sighted clearly (OFI).

#### **7.8.3**

The company has the permit of POME Land Application based on Environmental Agency Decree No. 88.45/424/KEP/BLHD/2016, and the renewal Decree No. 188.46/001/KEP/IPAL/DPMPPTSP/2019 dated 11 October 2019. The latest permit including the expansion of LA area from 13 blocks (279.98 ha) become 19 blocks (439.9 ha). The previous area were Blocks of K50, K51, K53, K54, K55, K56, K57, L52, L53, L54, L55, L56, L57, and the additional area

were Blocks of K59 – K64 (159.92 ha).

Based on field observation in land application area, it was known that there was no leaking of waste outside the flatbed. The waste water quality testing conducted monthly by accredited laboratory. The parameters tested include BOD, COD, pH, oil and fat, Pb, Cu, Cd, and Zn. All testing parameters in the period of October to December 2019 were below the regulatory standard. For example, the result of BOD in outlet for October to December 2019 were 1,953 mg/l, 1,950 mg/l, 2,183 mg/l, still below the regulatory standard that was 5,000 mg/l.

#### 7.8.4

Mill water use has been monitored and recorded in document of Recapitulation of Water Usage and Distribution. The record has been covered the FFB process, detail of water usage for process and non process, total water usage, and water usage per ton of FFB. For instance the total water usage in 2019 was 253,241.07 m<sup>3</sup>, that is 0.65 m<sup>3</sup>/ton FFB.

**Status: Comply**

#### 7.9

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

##### 7.9.1

The company has plans to increase the efficiency of the use of renewable fuels available in the GHG mitigation document, where one of them explains the use of renewable fuels for fossil fuel substitution. The company has reduce the use of fossil fuel by use of energy renewable, the record of efficiency use of fossil fuels for 2019, which inform the actual Biodiesel used in 2019 amount 0.29 l/ton of FFB from budget 0.33 l/ton of FFB, the saving of Biodiesel of 2019 caused by the usage of fibre and shell amount of 94 %.

**Status: Comply**

#### 7.10

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

##### 7.10.1

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

##### Summary of Net GHG Emissions

<b>Emission per product</b>	<b>tCO<sub>2</sub>e/tProduct</b>
CPO	3.02
PK	3.02
<b>Production</b>	<b>t/yr</b>
FFB processed	324,667.30
CPO produced	66058.39
PK produced	19995.72
<b>Extraction</b>	<b>%</b>
OER	20.35
KER	6.16
<b>Land use</b>	<b>Ha</b>
Planted area	10484.67
Planted on peat	0
Conservation Area (Forested)	0



Conservation Area (Non Forested) 466.13

#### Summary of field emission and Sinks

Description	Own crop		3rd		Total
Emissions Sources	tCO2e	tCO2e/tFFB	tCO2e	tCO2e/tFFB	
Land conversion	74627.09	0.31	0	0	74627.09
CO2 emissions from fertilizer	8026.52	0.03	0	0	8026.52
NO2 emissions from peat	0.00	0.00	0	0	0.00
NOO2 from Fertilizer	8215.53	0.03	0	0	8215.53
Fuel consumption	1218.34	0.01	0	0	1218.34
Peat oxidation	0	0	0	0	0
Sinks					
Crop sequestration	-81991.84	-0.34	0	0	-81991.84
Sequestration in Conservation area	0.00	0	0	0	0.00
Total	10095.63	0.04	185525.60	0	195621.24

#### Summary Oil Mill Emissions and Credits

Remarks	tCO2e	tCO2e/t FFB
Emissions sources		
POME	63640.29	02
Fuel consumption	369.91	0
Grid electricity	0	0
Credits		
Export of grid electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	64010.20	0.2

#### Palm Oil Mill Effluent (POME) Treatment

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

#### POME Divert to Anaerobic Digestion

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

There is an increase in GHG values due to several factors:

1. the change from GHG v.3 to GHG v4 cannot be compared.
2. There are different parameters such as 100% fertilizer in V4, whereas in V3 only 80%.
3. FLD uses its own calculation which results are bigger than the default value, for example for the calculation of fertilizer transportation.

#### 7.10.2

There was no new developments since 2014 in the operational area.

#### 7.10.3

The company has had documents of GHG identification in Estate and Mill, and GHG mitigation plan. Those documents

describes the sources of emissions, management and monitoring plans and implementation schedules. For instance, the emissions generated from the used of fossil fuels are monitored, recorded routinely. The effort to reduce GHG from fossil fuels by maximizes the use of shells and fiber.

The Mitigation Plan of GHG through energy efficiency, planting trees in the Mill environment, vehicle exhaust testing, preventive maintenance of machines, etc. The implementation has been conducted through energy efficiency, planting trees in the Mill, testing of vehicle exhaust gases, preventive maintenance of tools and machinery, POME Land Application, application of fertilizer in accordance with recommendations, calculating GHGs using Palm GHG-4 Calculator.

**Status: Comply**

#### **7.11**

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

##### **7.11.1**

The latest planting year was on 1998, there was no new planting or replanting.

##### **7.11.2, 7.11.3**

The company has disseminated the company's policy related fire prevention to surrounding community such as Villagers of Simpang Rusa, Kembiri, and Air Gede, on 25<sup>th</sup> June 2019. The company also involved in government program to establish *Masyarakat Siaga Api* (MSA) and *Masyarakat Peduli Api* (MPA), a surrounding community that has awareness, trained, and have facilities to prevent and fight the land burning. There was proposal of funding to top management of SMART dated 23<sup>th</sup> January 2020, that still need approval from top management.

**Status: Comply**

#### **7.12**

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

##### **7.12.1 – 7.12.8**

The planting was conducted during the period of 1995 – 1998 and there is no new land clearing after November 2005. GAR as the parent of PT FLD has conducted disclosure of liability data and zero liability disclosure on 29 August 2014. There is no High Forest Cover Landscapes (HFCLs) within HFCCs is develop by CH.

##### **7.12.2**

HCV assessment has been conducted in 2012 by RSPO Approved Assessor, the identification result has been review by independent peer reviewer and has been consulted to affected parties on 22 February 2013. Assessment held using HCV toolkit 2008. Total HCV identified covers 466.13 ha, consist of riparian area, cemeteries, sacred forest, water spring and sacred tree. There are 7 types of RTE species found, namely: *Tarsius bancanus*, *Trachypiterhecus cristatus*, *Pitropus vampirus*, *Trangulus javanicus*, *Macaca vasicularis*, *Anthreptes simplex*, *Anthracoceros malayanus* and *Ichthyophaga humilis*.

##### **7.12.4, 7.12.7**

The HCV Management and Monitoring Plan including fauna and flora has been set annually refers to the direction from the HCV Assessment Report (including the stakeholder consultation), and updated annually based on previous review of management and monitoring implementation reports. Based latest management and monitoring report known that the implementation has been carried out properly according to the plan, covers the HCV monitoring, safeguarding high conservation value areas, enriching conservation plants in conservation areas, management of potentially high erosion areas, monitoring the river quality of high conservation value, socialization of conservation area and protected flora fauna.

The HCV Management and Monitoring Plan reviewed annually and updated if necessary considering the previous implementation input. Based on review of HCV Management and Monitoring Report of 2019, the issues and programs for 2020 still relevant and there was no need to update compared to the previous plan.

##### **7.12.5**

In the HCV Assessment, identified several HCV area outside the HGU (lowland, watersprings, forest) both in the TRSE and TKME, that has been agreed with village representatives and community leaders, for example the HCV Management

Agreement between TRSE and the Community for the management of springs in Block P15 signed by Kembiri Village on 29 February 2016. Based on interviews with Kembiri Village Head mention that the management of HCV areas have been done collaborated and there is no interference from the community against the area.

**7.12.6**

The program to protect the RTE species includes in HCV Management and Monitoring Plan, such as routine patrols, installation of signboard and fire monitoring tower, dissemination to workers and surrounding stakeholders, and supervision in weed spraying activities. The implementation has been observed, sighted HCV and hunting prohibition signboard in Air Mundur River (TKME Block D40), fire monitoring tower (TKME Block J48), as well as based on interview to the workers and Village Heads (Crucuk and Kembiri Villages), that they known the company's procedures to protect HCV/RTE species and prohibition to hunting.

**7.12.8**

The planting was conducted during the period of 1995 – 1998. There is no land clearing after November 2005 or after November 2018.

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

<b>1.</b>	<b>Evidence of permission or approval certificate and trademark from Certification Body which submitted by Client</b>	<b>X or√</b>
<b>ASA-1.1</b>	PT Forestalestari Dwikarya do not use RSPO trademark and CB Logo.	NA
	<b>Status: Comply</b>	
<b>2.</b>	<b>Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of trademark Use</b>	<b>X or√</b>
<b>ASA-1.1</b>	PT Forestalestari Dwikarya do not use RSPO trademark and CB Logo.	NA
	<b>Status: Comply</b>	
<b>3.</b>	<b>Implementation of Certificate and Trademark is not used on product</b>	<b>X or√</b>
<b>ASA-1.1</b>	PT Forestalestari Dwikarya do not use RSPO trademark and CB Logo.	NA
	<b>Status: Comply</b>	
<b>4.</b>	<b>Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.</b>	<b>X or√</b>
<b>ASA-1.1</b>	PT Forestalestari Dwikarya do not use RSPO trademark and CB Logo.	NA
	<b>Status: Comply</b>	

### 3.3 Summary of RSPO Partial Certification.

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

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

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

MUTU Auditor has verified company partial certification and concludes that:

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

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

		<p>7. PT Sawit Mas Sejahtera (Sungai Kikim and supply base) compliance audit on October 2019</p> <p>8. PT Sinar Kencana Inti Perkasa (Sungai Magalau Mill and supply base) compliance audit on January 2019</p> <p>9. PT Agro Lestari Sentosa (Jalemo Mill and supply base) compliance audit on January 2019</p> <p>10. PT Adi Tunggal Mahajaya (Sako Mill) (under construction) compliance audit on December 2019</p> <p>11. PT SMART (Bukit Kapur Mill and supply base) compliance audit on January 2019</p> <p>12. PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base) compliance audit on December 2019</p> <p>13. PT Kresna Duta Agroindo (Gunung Kombeng Mill and supply base) compliance audit on March 2019</p> <p>14. PT Sawitakarya Manunggal (Sawita Mill and supply base) compliance audit on October 2019</p> <p>There 2 companies which under system development. The companies are PT Bahana Karya Semesta and PT Bangun Nusa Mandiri. PT Bahan Karya Semesta is newly acquisition and PT Bangun Nusa Mandiri is on process to construct the mill.</p>
i.	No replacement of primary forest or any area identified as containing High Conservation Values (HCVs) or required to maintain or enhance HCVs in accordance with RSPO criterion 7.3 (it has changed be Criterion 7.12 in P&C 2018)	<p><b>Company Group/Holding Statement:</b> Several companies under GAR were planted above November 2005, while the HCV assessment process was conducted in the period 2010 – 2013.</p> <p>GAR and its subsidiaries have been reporting disclosure and zero liability to RSPO by email dated August 29, 2014.</p> <p>26 companies have been developed after November 2005 and are currently following the RaCP process with progress as of January 12, 2019 as follows:</p> <p>a) 5 report are concept note review in RSPO:</p> <ol style="list-style-type: none"> <li>1. PT Buana Arta Sejahtera – Kalimantan Tengah</li> <li>2. PT Kresna Duta Agroindo – Kalimantan Timur</li> <li>3. PT Agrolestari Sentosa – Kalimantan Tengah</li> <li>4. PT Sumber Indah Perkasa – Papua</li> <li>5. PT Kencana Graha Permai – Kalimantan Barat</li> </ol> <p>b) 20 report need more clarification on LUCA review</p> <ol style="list-style-type: none"> <li>1. PT Satya Kisma Usaha – Jambi</li> <li>2. PT Bumi Sawit Permai – Sumatera Selatan</li> </ol>



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

	<ol style="list-style-type: none"> <li>6. PT Binasawit Abadipratama – Kalimantan Tengah</li> <li>7. PT Aditunggal Mahajaya – Kalimantan Tengah</li> <li>8. PT Agrolestari Sentosa – Kalimantan Tengah</li> <li>9. PT Agrokarya Primalestari – Kalimantan Tengah</li> <li>10. PT Buana Adhitama – Kalimantan Tengah</li> <li>11. PT Buana Artha Sejahtera – Kalimantan Tengah</li> <li>12. PT Agrolestari Mandiri – Kalimantan Barat</li> <li>13. PT Paramitra Internusa Persada – Kalimantan Barat</li> <li>14. PT Persada Graha Mandiri – Kalimantan Barat</li> <li>15. PT Bangun Nusa Mandiri – Kalimantan Barat</li> <li>16. PT Kartika Pria Cipta – Kalimantan Barat</li> <li>17. PT Kencana Graha Mandiri – Kalimantan Barat</li> <li>18. PT Cahaya Nusa Gemilang – Kalimantan Barat</li> </ol> <p><b>Auditor Verification:</b> Based on auditor verification, not all uncertified unit conduct new clearing after January 2010 but for all uncertified unit with land clearing after January 2010 has follow NPP. Detail information of uncertified unit are:</p> <ol style="list-style-type: none"> <li>1. PT Sinar Kencana Inti Perkasa (Kasuari Mill and supply base): there is no new land clearing after January 2010</li> <li>2. PT Agrolestari Mandiri (Pekawai Mill and supply base): NPP on 26 April 2014</li> <li>3. PT Binasawit Abadi Pratama (Perdana Mill and supply base): NPP on 8 July 2014</li> <li>4. PT Agrokarya Prima Lestari (Kuayan Mill and supply base): NPP on 26 April 2014 and PT Buana Adhitama (supply base) conduct NPP on 4 June 2014.</li> <li>5. PT Mitra Karya Agroindo (Tangar Mill and supply base): NPP on 26 April 2014</li> <li>6. PT Paramitra Internusa Pratama (Belian Mill and supply base): NPP on 3 June 2014, PT Kartika Prima Cipta (supply base) conduct NPP on 8 July 2014 And PT Persada Graha Mandiri (Supply base) conduct NPP on 6 June 2014.</li> <li>7. PT Sawit Mas Sejahtera (Sungai Kikim and supply base): there is new planting after January 2010 in Sungai Kikim Estate and Sungai Saling Estate, the company not conduct NPP. <b>This is become subject of sanction.</b> For PT Buana Sawit Mas (supply base) conduct NPP on 8 July 2014.</li> <li>8. PT Sinar Kencana Inti Perkasa (Sungai Magalau Mill and supply base): there is no new land clearing after January 2010.</li> <li>9. PT Agro Lestari Sentosa (Jalemo Mill and supply base): NPP on 26 April 2014</li> </ol>
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		<p>10. PT Adi Tunggal Mahajaya (Sako Mill) (under construction): NPP on 25 April 2014, PT Agrokarya Prima Lestari (supply base) conduct NPP on 26 April 2014 and PT Mitra Karya Agroindo (supply base) conduct NPP on 26 April 2014.</p> <p>11. PT SMART (Bukit Kapur Mill and supply base): there is no new land clearing after January 2010.</p> <p>12. PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base): NPP on 8 July 2014</p> <p>13. PT Kresna Duta Agroindo (Gunung Kombeng Mill and supply base): NPP on 8 July 2014</p> <p>14. PT Sawitakarya Manunggal (Sawita Mill and supply base): there is new land clearing after January 2010 in Sawita KPPA and company not conduct NPP. <b>This is become subject of sanction.</b></p>
ii.	<p>Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO criteria 2.2, 6.4, 7.5 and 7.6 (it has changed be Criterion 4.8, 4.7 and 4.5 in P&amp;C 2018).</p>	<p><b>Company Group/Holding Statement:</b> There are no land conflicts. The Company has a land conflict resolution mechanism in accordance with the RSPO criteria 6.4; 7.5; and 7.6. This procedure is outlined in the <i>SOP Penanganan Konflik Sosial</i> (SOP/SMART/SENS-CSR/SADV/II/02 Rev 1 on 18 May 2016) and <i>SOP Penanganan Keluhan dan Ketidakpuasan</i> (SOP/ SMART/ GIMS-SCDM/ USDV/ I/ 001 Rev 2 on 11 April 2017). This procedure regulates social conflict settlement agreed. Conflict resolution can be done in a participatory manner and can also be done by a third party (mediator).</p> <p>The company also has procedures to deal with complaints before they become conflicts. The procedure is SOP/ SMART/ GIMS-SCDM/ USDV/ I/ 001 Rev 2 on 11 April 2017. The company handling complaints appropriately and quickly. GAR has been initiated to become a member of RSPO DSF as a category "growers".</p> <p>Here recap of complaint progress related to GAR which publish in RSPO Website:</p> <ol style="list-style-type: none"> <li>1. PT Kartika Prima Cipta (Muara Tawang Estate: complaint by FPP related to FPIC process and the latest information is waiting response from external review which appointed by RSPO and until 3 January 2020 there is no response from RSPO.</li> <li>2. Kapuas Hulu Region (PT Kartika Prima Cipta, PT Persada Graha Mandiri and PT Paramitra Internusa Pratama) related to legality, GAR</li> </ol>

		<p>already reply RSPO email and until 3 January 2020 there is no response from RSPO.</p> <ol style="list-style-type: none"> <li>PT Agrolestari Mandiri (Pekawai Mill), GAR already sent to RSPO related to Indonesian industrial court decisions and until 3 January 2020 there is no response from RSPO.</li> <li>PT Kartika Prima Cipta (Muara Tawang Estate): complaint by LinkAr Borneo related to land claim. Update on 29 July 2019 RSPO inform that CP agree to allow withdrawals by LinkAr Borneo.</li> <li>Compliance audit which conduct in uncertified unit period 2019 there is no land conflict and unit already socialize <i>SOP Penanganan Keluhan dan Ketidakpuasan</i>, Human Rights Policy and <i>SOP Penanganan Konflik Sosial</i> to internal and external.</li> </ol> <p><b>Auditor Verification:</b> Auditor has verified the supporting evidence of above the company statement. There are no land conflicts for</p> <ol style="list-style-type: none"> <li>PT Sinar Kencana Inti Perkasa (Kasuari Mill and supply base)</li> <li>PT Binasawit Abadi Pratama (Perdana Mill and supply base)</li> <li>PT Agrokarya Prima Lestari (Kuayan Mill and supply base)</li> <li>PT Mitra Karya Agroindo (Tangar Mill and supply base)</li> <li>PT Sawit Mas Sejahtera (Sungai Kikim and supply base)</li> <li>PT Sinar Kencana Inti Perkasa (Sungai Magalau Mill and supply base)</li> <li>PT Agro Lestari Sentosa (Jalemo Mill and supply base)</li> <li>PT Adi Tunggal Mahajaya (Sako Mill and supply base)</li> <li>PT SMART (Bukit Kapur Mill and supply base)</li> <li>PT Kresna Duta Agroindo (Rantau Panjang Mill and supply base)</li> <li>PT Kresna Duta Agroindo (Gunung Kombeng Mill and supply base)</li> <li>PT Sawitakarya Manunggal (Sawita Mill and supply base)</li> </ol> <p>There are any land conflicts but was in the process of completion for:</p> <ul style="list-style-type: none"> <li>PT Paramitra Internusa Pratama (Belian Mill and supply base). The supply base of Belian mill are PT Kartika Prima Cipta and PT Persada Graha Mandiri.</li> </ul>
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		- PT Agrolestari Mandiri (Pekawai Mill and supply base).
iii.	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3 (it has changed be Criterion 4.2 in P&C 2018).	<p><b>Company Group/Holding Statement:</b> The company has procedures for handling workers complaints before it become conflict. The procedure is SOP/ SMART/ SIGS-CSR/ SADV/ I/ 003. Procedures related to workers problems are arranged in the internal flow chart because workers are categorized as internal stakeholder. The media of complaint used is an official letter submitted through a union or put into a suggestion box provided at a strategic location.</p> <p>Here recap of complaint progress related to GAR which publish in RSPO Website:</p> <ol style="list-style-type: none"> <li>1. PT Agrolestari Mandiri (Pekawai Mill), Kalimantan Barat, a complaint by the <i>Serikat Buruh Sejahtera Indonesia</i> in Ketapang District on 30 August 2018. The complaint submitted was that the company allegedly laid off workers with violations of Indonesian labor law. the current status is still in progress.</li> <li>2. PT SMART, Sumatera Utara, complaints by 56 workers of PT SMART and local communities in Hamlet of Belongkut I, II and III on 18 October 2018 related to a) the company allegedly did not pay severance in accordance with labor law No. 13 of 2003 to 56 former workers, b) workers suspect that the company is not compliant with CSR related regulations, especially environmental differences. Current status, CP warning letter to the representative of the people of hamlet I / II / III Belongkut.</li> <li>3. PT SMART Tbk, PT MPLWI Sumatra Utara, complaints from <i>Konsulat Cabang Federasi Serikat Pekerja Metal Indonesia</i> (KC-FSPMI) related to discrimination against workers and women workers who were not given safety equipment and did not get maternity leave and birth leave. The status is currently an internal progress review.</li> </ol> <p><b>Auditor Verification:</b> There is information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries, consist of:</p> <ul style="list-style-type: none"> <li>• PT Agrolestari Mandiri (Pekawai Mill), company already sent to RSPO related to Indonesian industrial court decisions and until 3 January 2020 there is no response from RSPO.</li> <li>• PT Mitrakarya Agroido: <a href="https://www.mongabay.co.id/2018/08/22/potret-">https://www.mongabay.co.id/2018/08/22/potret-</a></li> </ul>



		<p><a href="#">perburuhan-sawit-sinar-mas/</a>. GAR has issued media release about Sinar Mas Agribusiness and Food continues efforts to improve worker experience in palm oil operation nationwide. This media release inform the progressively converting our daily workers to permanent status according to their skill and qualification. From late November 2017 until June 2018 company have converted more than 1,300 daily workers to permanent staff for our operations at PT Tapan Nadenggan and PT Mitra Karya Agroindo.</p> <ul style="list-style-type: none"> <li>PT Sawit Mas Sejahtera: <a href="https://pusaka.or.id/2019/01/surat-protas-tindakan-sewenang-wenang-perusahaan-pt-sawit-mas-sejahtera-terhadap-buruh-perkebunan-dan-aktifis-serikat-buruh-gsbil/">https://pusaka.or.id/2019/01/surat-protas-tindakan-sewenang-wenang-perusahaan-pt-sawit-mas-sejahtera-terhadap-buruh-perkebunan-dan-aktifis-serikat-buruh-gsbil/</a>. Bipartite on 11 April 2019, the parties agreed to terminate the work agreement as of 1 Feb 2019 and withdraw the claim.</li> </ul> <p>There is no labor issue in other uncertified unit.</p>
iv.	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1 (it has changed be Criterion 4.2 in P&C 2018).	<p><b>Company Group/Holding Statement:</b> Companies comply with the regulations in accordance with the requirements of the RSPO 2.1 and 2.2 where there is no violation of the rules that are relevant to the plantation. The company has a mechanism to evaluate compliance with regulations, namely SOP/SMART/UMUM/SADV/I/002. In SOP describes procedures for compliance, completeness and groove sections which explain in detail to evaluate compliance with the legislation.</p> <p>Subsidiaries of GAR which still on going to process HGU consist of:</p> <ol style="list-style-type: none"> <li>1. PT Djuanda Sawit Lestari (Muara Kandis Estate / Muara Tawas Estate)</li> <li>2. PT Sawit Mas Sejahtera (Sawit Mas Estate)</li> <li>3. PT Bumi Sawit Permai (Bumi Sawit Estate)</li> <li>4. PT Sumber Indah Perkasa (Sungai Buaya Estate, Sungai Merah Estate)</li> <li>5. PT Ivo Mas Tunggal (Samsam Estate, Kandista Estate, Nenggala Estate, Sei Rokan Estate, Ujung Tanjung Estate)</li> <li>6. PT Buana Wiralestari Mas (Nagasakti Estate; Nagamas Estate and Kijang Estate)</li> <li>7. PT Ramajaya Pramukti (Ramarama Estate)</li> <li>8. PT Binasawit Abadipratama (Perdana Estate, Lenggana Estate, Semandau Estate, Muara Dua Estate, Perdana Mill)</li> <li>9. PT Agrokarya Prima Lestari (Mentaya Estate, Kuayan Estate, Bukit Santuhai Estate, Tajur</li> </ol>

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

NCR No.	:	2019. 01	Issued by	:	Asystasya Aishah Silalahi
Date Issued	:	14 February 2019	Time Limit	:	ASA 1.1
NC Grade	:	Minor	Date of Closing	:	13 February 2020
Standard Ref. & Requirement	:	6.1.4 The documented plan for management and monitoring of social impacts, shall be reviewed at least on two-yearly basis. If necessary, the plan should be updated. There shall be evidence that the review process includes participation of all affected parties.			
Evidence observed & Non-Conformance Description (filled by auditor):					
<p>The company has a review of the management and monitoring of social impacts carried out in 2017. The document has explained the management plan and monitored the social impacts identified and has been prepared based on the participation of the affected parties.</p> <p>Based on interview with representatives of Kembiri and Cerucuk Village, there were several social issues and negative perceptions from the community such as lack of information on job vacancies, disruption of local wisdom due to washing trenches carried out by the company, traditional assistance (<i>Maras Tahun</i>) which was considered less, FFB load exceeded capacity, and so on. This was also added from the results of interviews with the Department of Environment, Belitung Regency is related to the potential for social upheaval in the community. In response, the company showed evidence that these issues had been covered in a review of management plans, social monitoring and had implemented the plan.</p> <p>However, the company has not been able to show evidence that the results of the review of the management plan for these impacts have been precisely targeted, so that there is some issue raised during the audit activities. In addition, the review does not cover all existing social impacts, such as the impacts related to land disputes since 2015 and environmental pollution issues since 2016, such as on the website <a href="https://beritalama.com">https://beritalama.com</a> June 11, 2016, <a href="https://bangka.tribunnews.com">https://bangka.tribunnews.com</a> December 26, 2018 and the 29th edition of the Belitung Betuah newspaper (January 30 - February 13, 2019).</p>					
Root Cause Analysis (filled by organization audited):					
<p>The issues in the 2017 Review and Social Impact Monitoring report in 2018 are based on the results of interviews (verification) of village officials and community leaders, as well as RPL RPL document references. Some of the issues not yet covered can occur due to several reasons, including differences in the samples taken and the use of mass media as references or secondary data.</p>					
Correction (filled by organization audited):					
<p>On the 2nd week of March 2019, a review of the Management Plan and Social Impact Monitoring Plan will be conducted at PT FLD</p>					
Corrective Action (filled by organization audited):					
<p>During the next period of monitoring and management of Social Impacts, there will be an increase in the number of informant sampling, focusing not only on village officials and community leaders, but also on the general / affected community. Mass media and other document studies will also be used as secondary data in the implementation of Social Impact Monitoring.</p>					

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

**Verification of 13 February 2020.**

- The company has re-identified and managed social issues in the 2019 Social Impact Management and Monitoring Review, which has covered these issues including the problems of land disputes and environmental pollution from POME LA.
- Results of interviews with the Kembiri Village and Cerucuk Village Officials, it is known that issues such as job vacancy information, trench washing disturbance, etc. have been managed by the company.
- The company has shown evidence that the Social Impact Management and Monitoring Plan and CSR Program have been prepared in a participatory manner with the community, and have been realized. The program includes the economic empowerment of rural communities such as the organic pepper program.
- Related to the environmental issue, the company had submitted the proposal for the POME LA expansion area, and issued Decree of Investment and Industry Agency No. 188.46 / 001 / KEP / IPAL / DPMPTSP / 2019 dated 11 October 2019. The covered area expand from 13 blocks (279.98 ha) to 20 blocks (439.9 ha). Additional area of blocks K59 - K64 (159.92 ha). Field observation, sighted of flatbed making in the bed and the spare parts such as parallon pipes in the warehouse. The results of field observations in the POME LA area did not reveal any indications of waste leakage.
- Regarding land dispute issues, the company implements management in accordance with the 2019 Social Impact Management and Monitoring Review, and company procedures related to land dispute handling, with the final progress as follows:
  - Information of SHM of claimant No. 27.Kembiri dated 02 April 1987 and HGU of PT FLD No. 13 dated 05 December 2001.
  - Participative field mapping and measurement activities picture documentation dated 24 February 2018 that conducted by inheritee and PT FLD representative. The map is presented in document No. 034/100/PLMO/02/18 dated 24 February 2018, with scale 1:5,000. Overlapped palms were identified and marked on the map (69 palms).
  - Inheritee proposal of compensation letter dated 09 November 2018 value for IDR 95 millions has responded by PT FLD through Letter No. 012/FLD-D&L2/XI/2018 dated 14 November 2018 which informed that value of compensation proposed by company was IDR 20 millions only, without any compensations for plants above overlapped areas.
  - Minutes of discussion with DPRD (Parliament) of Belitung Regency dated 29 January 2019, attended by 25 stakeholders, included government representatives. The meeting resulting that resolution shall be conducted through "*Musyawarah Mufakat*" or consensus.
  - Minutes of mediation with Head Office Jakarta dated 08 March 2019 which informed that compensation is only accepted when refers to NJOP of Kembiri Village that totaling about IDR 26 millions. Minutes signed by Acting Head of Kembiri Village and Inheritee representative.
  - Advocate/Lawyer Ariel Siva Legal Assistance & Law Office Letter No. 13/07-KAAS/VII/2019 dated 05 July 2019; No. 05/08-KAAS/VII/2019 dated 07 August 2019; and No. 17/08-KAAS/VII/2019 dated 22 August 2019. Those letters subjected on summation (*somas*) towards overlapped area covers 0.38 ha located in Division 7 Block L 47. Those letters had responded through Letter of TKME Manager No. 01/IX/2019 dated 02 September 2019 about completeness of inheritees/claimant relevant data towards overlapped areas. Coordination report towards this matters had delivered to Head Office in Jakarta via email dated 18 September 2019.
  - Claim chronology dated 18 September 2019 prepared by D&L Staff and TKME Manager, which explained time line of claim where starts since 19 February 2018 for overlapped area covers 0.38 ha located in Division 7 Block L 47.
  - Treatise (Risalah) of Meeting dated 04 February 2020 between two (2) PT FLD representatives, one (1) inheritee representative and two (2) witnesser from inheritees sides about proposal of compensation value of the overlapped areas in Division 7 Block L47 TKME totaling about IDR 75 millions. There were six (6) inheritees that legitimate by *Ketua RT*, Air Gede Hamlet Head, Village Head Kembiri and Sub-district head of Membalong. The value is delivered to Head Office in Jakarta for approval or rejection response through email dated 04 February 2020.



- Based on observation to overlapped area in Division 7 Block L47, it was known that the overlapped area and/or palms has marked with red-cross paint and there is no indication of harvesting activities and/or other agronomy input on the particular field.

Additional note:

According to Article 30 of Minister of Agraria Regulation No. 07 in 2017, it was explained that "In the case that a business title has been issued a certificate in accordance with statutory provisions and is actually controlled by the right holder, then other parties who feel they have land rights can no longer demand the exercise of these rights if within 10 (ten) years of the certificate issuance. it does not submit objections in writing to the certificate holder and the Head of the Land Office concerned or does not file a lawsuit to the Court regarding the control of the land or the issuance of the certificate".

Based on the description, it is known that the company has conducted a participatory social impact review, has identified the latest social impacts, and has been managed or is in the process of managing the impacts. This nonconformity is stated as comply.

<b>Verified by</b>	<b>:</b>	<b>Arif Faisal Simatupang</b>
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**3.4.2. Identification of Findings, Corrective Actions and Observations at ASA 1.1**

<b>NCR No.</b>	:		<b>Issued by</b>	:	
<b>Date Issued</b>	:		<b>Time Limit</b>	:	
<b>NC Grade</b>	:		<b>Date of Closing</b>	:	
<b>Standard Ref. &amp; Requirement</b>	:				
<b>Evidence observed &amp; Non-Conformance Description</b> (filled by auditor):					
There is no non-conformity finding during ASA 1.1					
<b>Root Cause Analysis</b> (filled by organization audited):					
<b>Correction</b> (filled by organization audited):					
<b>Corrective Action</b> (filled by organization audited): media and other document studies will also be used as secondary data in the implementation of Social Impact Monitoring.					
<b>Assessor Evaluation and Conclusion</b> (filled by auditor):					
<b>Verified by</b>	:				

**3.4.3. Opportunity for Improvement**

No	Ref. Std.	Description
1	6.7.3	Ensuring the availability of PPE safety shoe stock has been adjusted to the size of the worker
2	7.8.1	During observation in Aik Mundur River, several boundary marking has been faded and invisible, the company has an opportunity for improvement to ensure the riparian border marking sighted clearly.

**3.4.4. Noteworthy Positive Components**

No	Description
1	The company's commitment in implementing sustainable palm oil plantation standards.
2	Have a plasma plantation development cooperation
3	Already have ISCC and ISPO Certifications
4	Has obtained PROPER BIRU 2018 - 2019
5	Do not use pesticides made from paraquat
6	Has applied a method to apply empty bunch mechanically

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

Public Issues	Auditor Verification
<p><b>National Land Agency (BPN) of Belitung Regency</b> Date of interview: 10 February 2020 Interviewee: There were three (3) representatives being interviewed. However, all interviewees are not willing to sign audit notes due to anonymously reason.</p> <ul style="list-style-type: none"> <li>Unit of certification is considered cooperative in term of providing related data. For example, as shows through evidence of delivery on Annual Land Title Utilization for period 2018 and 2019.</li> <li>Regarding OFI note from re-certification assessment which informed that progress of overlapping areas between PT FLD Land Title (HGU) and community(-ies) Property Right (SHM) where situated in Tanjung Kembiri Estate (TKME) shall be monitored, interviewee stated that the issue has not been discussed and mediation involving BPN is not yet implemented.</li> <li>Interviewee stated that unit of certification is not properly identified previous land owner inventory. Thus, overlap areas is not properly covered, caused the issue which raised around 2018.</li> <li>Comment and respond from the Head of Village is suggested to be carried out by Auditor.</li> <li>Currently there is no conflict causing disturbance of estate operational activities.</li> </ul>	<ul style="list-style-type: none"> <li>Evidence of interview is available through BPN Cop (Stamp).</li> <li>Unit of certification clarify that overlap issue has been raised since 2018. Negotiation evidence is available onsite.</li> <li>Based on compensation payment evidence when carried out in 1994 to 1995, it was known that the process has involving Head of Village and Head of Sub-Regency.</li> <li>Based on interview with one of land owner who also an occupant representative, it was known that progress of resolution is still ongoing through positive and condusive process.</li> <li>Based on observation to overlapped area where located in Division 7 Block L45 TKME, it was known that palms situated in overlapped area has been marked with redcross paint and there is no indication agronomy input, included harvesting activities on the particular field.</li> </ul>
<p><b>Environmental Agency of Belitung Regency</b> Date of interview: 10 February 2020 Interviewee: There were three (3) representatives being interviewed.</p> <p>Certification unit has been complied with applicable regulations, among others has had license of hazardous temporary warehouse, license of POME Land Application, environment permit, and etc. Every mandatory reports related environmental has been reported to agency. There is no complaints from stakeholder related environmental issue.</p>	<p>There is no negative issue that need further verification. Based on document review and field observations, the certification unit has demonstrated legal compliance related environmental, and no indications of environmental pollution.</p>
<p><b>Cooperation, Private Micro Company, Trading &amp; Manpower Agency of Belitung Regency.</b></p> <p>During the past year there has been one case related to industrial relations disputes that occurred in the certification unit which had been held in a tripartite meeting in January 2020. For industrial relations disputes, it had reached the stage of giving recommendations by</p>	<p>The certification unit has presented supporting documents for the settlement of industrial disputes that have taken place and has shown the latest response to the approval of the agency's recommendations in January 2020.</p>



Public Issues	Auditor Verification
<p>the agency.</p> <p>The company submitted the PKWT employee registration documents to the agency but did not complete the supporting documents such as the employment contract.</p> <p>Certification unit has been implemented minimum wage, overtime and others labor standard in accordance with government regulation. Every labor union has been verified by agency and still active in certification unit.</p>	<p>Currently the certification unit still has contract workers (PKWT) which are specifically given to workers who are PT FLD retirees who still need work when they are retired. the certification unit also sent back the supporting data for the contract workers (PKWT) registration to the agency on 11 February 2020 and has been proven with a receipt that said it had been registered.</p> <p>The certification unit has paid minimum wages, overtime and others labor standard in accordance with the government regulations.</p>
<p><b>Plantation Agency of Belitung Regency</b></p> <p>The company has establish Plasma even though not mandatory for PT FLD. There was no dispute related legal and environmental, however the CSR amount program considered to be improve.</p>	<p>Has been verified that the CSR program has been made in participatory manner and cover all aspect, include economy empowerment such as plasma, organic pepper, boiler chicken, etc.</p>
<p><b>Gender Committee of PKMM</b> Date of interview: 10 February 2020 Interviewee: two committee members</p> <ul style="list-style-type: none"> <li>• The committee had established for more than 6 years ago. The interviewee stated that before join with PKMM of PT FLD, the committee is already existed.</li> <li>• Apart from women employees, the member of Gender Committee has expanded into employees wife.</li> <li>• Unit of certification has support existence of committee through facilitating meeting place.</li> <li>• Among committee program during 2019 are Qur'an recitation in employees housing complex, participation in religious celebration, socialization on healthy life and clean environment.</li> <li>• During 2019, there is no case and negative issues related to women employees discrimination towards manpower rights, safety facilities, reproduction matters, sexual harassment and violence.</li> <li>• Unit management has accommodate reproductive rights such paid leave due to periodic menstruation (H1) and pregnant and/or breastfeeding period (H2). Leave has given when recommended after paramedic check up.</li> </ul>	<p>Based on interview, it could be concluded that unit of certification has support gender committee and in general, its presence is contribute a positive impact to women's employee. In general, it was known that working environment is considered safe, conducive and satisfactory in both estates and mill.</p>
<p><b>Local Contractor</b> Date of interview: 11 February 2020 Interviewee: owner</p> <ul style="list-style-type: none"> <li>• Contractor has conduct FFB transportation works with PT FLD since 90's by one (1) unit of truck.</li> </ul>	<p>Based on document review, it was known that contractor has comply with Indonesian regulation and RSPO requirement,</p>

Public Issues	Auditor Verification
<p>Contract is renew annually.</p> <ul style="list-style-type: none"> <li>• Payment of contract has conducted ontime in the date of 5<sup>th</sup> every month. PT FLD is considered transparent and fair in making business.</li> <li>• PPE and BPJS are provided and paid by contractor. These matters has been socialized by PT FLD.</li> <li>• FFB Net in the truck is provided by contractor.</li> <li>• Salary payment of contractor employee is carried out by contractor. Monitoring on contractor pursuance towards minimum wage regulation is never been conducted by unit of certification management.</li> <li>• Contractor has only one (1) employee that positioned as Truck Driver and FFB Loader. There is helper for FFB Loader which outsourced by contractor.</li> </ul>	<p>such as implementation of minimum wages, safety devices, Government insurance scheme (BPJS), etc.</p>
<p><b>Village Head of Kembiri Village</b>  <b>Village Council Head of Kembiri Village</b>  <b>Village Head of Crucuk Village</b>  Date of interview: 11 February 2020  Interviewee: There were nine (9) representatives being interviewed.</p> <ul style="list-style-type: none"> <li>- The communication and relation between villages around with company are well maintained, the company's public relation already known by the communities. The mechanism for complaint and grievance submission has been understood well by the community</li> <li>- There were no significant land disputes and no indication of contractually army or paramilitaries using in plantation area of PT. Forestalestari Dwikarya. There is no disturbance from the company to enclave area (land that recognized as belonging to the community who are not willing to be compensated) but there is some area of HGU that overlapping with land certificate ownership of community.</li> <li>- There are no indigenous rights or customary rights. It also known that compensation process is done directed to the land owner and landowners are given the freedom to release their land without coercion.</li> </ul>	<p>There was no negative issue that need further verification. Based on document review and field observations, there was no disputes related land legality, environmental, and social, as well as has shown land compensation documentary evidence carried out referring to the concept of FPIC.</p> <p>related to overlapping areas of HGU and SHM between the company and a community the company has mediated with the help of DRPD, until now mediation is still ongoing because there is no agreement on prices. The auditor conducts interviews with landowners.</p>
<p><b>Sawit Sejahtera Bersama Cooperative</b>  Date of interview: 11 February 2020  Interviewee: vice chairman</p> <ul style="list-style-type: none"> <li>- There is an MoU between PT FLD and Sawit Sejahtera Bersama cooperative.</li> <li>- FFB prices based on prices determined by plantation agency. Changes in FFB prices can be found</li> </ul>	<p>There was no negative issue that need further verification. The documentation has been shown that the payment of FFB from smallholders has been paid according to the agreement and on time.</p>

Public Issues	Auditor Verification
<p>through the internet or informed directly from the Tanjung Kembiri Mill</p> <ul style="list-style-type: none"> <li>- All smallholder farmers has land title (SHM)</li> <li>- Details of smallholder farmer payments are available on the payment slip. Deduction on farmer payments include operational costs and fees for the company.</li> </ul>	
<p><b>Land Owner in overlap area</b>  Date of interview: 12 February 2020  Interviewee: There were three (3) representatives being interviewed.</p> <p>Both parties, namely the company and the landowner, both know that there is an overlapping area of 0.38 Ha. A meeting has been held between the company and the land owner, but so far neither side has reached an agreement.</p> <p>the last meeting was held on 4 February 2020 between the land owner and his wife along with 1 representative of the community leaders. the latest application submitted by the last land owner is being submitted to the head office. during the process there was never any coercion from any party. the process is carried out in accordance with applicable regulations.</p>	<p>The auditor has verified the meeting notes between the company and the land owner, the information submitted by the management and the land owner is the same, the process is ongoing and no agreement has yet been found.</p>
<p><b>Contractor for FFB Transport (PT Satrindo Jaya Agropalma).</b></p> <p>The company continues to improve business and empower local communities by cooperating with local contractors, for example in making box culverts, making concrete harvest bridges and renovating employee housing. Making a work agreement based on the agreement between the two parties and payment is made on time in accordance with the contents of the agreement. The company always conducts socialization and evaluation related to the fulfillment of labor social assurance and the OHS aspects of contractor workers.</p>	<p>There was no negative issue that need further verification. he company has demonstrated its commitment to develop local communities. In addition documentation has been shown that the payment of the contractor's results has been paid according to the agreement and on time.</p>
<p><b>Gender Committee of TKME</b></p> <p>The Gender Committee still active in every unit. Gender Committee activities include socialization of sexual harassment, complaints, general health and so on. There are no issues related to sexual harassment.</p> <p>Female workers have the right to get menstruation leave (H1), maternity leave (H2) and has been given freedom to breastfeed their child while working.</p>	<p>There are no negative issues that need further verification.</p>



Public Issues	Auditor Verification
<p><b>Worker Union (SPSI) of Tanjung Kembiri Mill</b></p> <p>There was no negative issue related employment (minimum wage, overtime), and OHS such as PPE and PPE replacement.</p>	<p>There was no negative issue needed for specific verification.</p>
<p><b>Labour Union (SPSI) of PT Forestalestari Dwikarya.</b></p> <p>The relationship between the certification unit and the union is well established, the certification unit supports the existence of the union and gives freedom to unionized employees and facilitates the union by giving room as an office. In the past one year period there were no work relationship disputes found, all employee rights were fulfilled by the certification unit in accordance with applicable regulations.</p>	<p>There are no negative issues that need further verification. The certification unit has ensure that the employee's rights have been fulfilled in accordance with the regulations.</p>

<b>4.0</b>	<b>CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY</b>
<b>4.1</b>	<b>Formal Sign-off of Assessment Findings</b>
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;"> <p>PT Forestalestari Dwikarya Head of SPO Certification &amp; Low GHG Emissions Strategy</p>  <p><b><u>Yahya Mustakim</u></b> Friday, 14 February 2020</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><b><u>Arif Faisal Simatupang</u></b> Friday, 14 February 2020</p> </div> </div>

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

No	Institution/NGO/Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
1	Environmental Agency	Tanjung Pandan, Belitung Regency	-	Direct Interview	10 February 2020	✓	
2	Cooperation, Private Micro Company, Trading & Manpower Agency	Tanjung Pandan, Belitung Regency	-	Direct Interview	10 February 2020	✓	
3	Food Protection & Plantation Agency	Tanjung Pandan, Belitung Regency	-	Direct Interview	10 February 2020	✓	
4	National Land Agency	Tanjung Pandan, Belitung Regency	-	Direct Interview	10 February 2020	✓	
5	Village Council Head of Kembiri Village	Sub-District of Membalong, Belitung Regency	-	Direct Interview	11 February 2020	✓	
6	Village Head of Kembiri Village	Sub-District of Membalong, Belitung Regency	-	Direct Interview	11 February 2020	✓	
7	Village Head of Crucuk Village	Sub-District of Membalong, Belitung Regency	-	Direct Interview	11 February 2020	✓	
8	Sawit Sejahtera Bersama Cooperative (Tanjung Rusa Smallholder)	Sub-District of Membalong, Belitung Regency	-	Direct Interview	11 February 2020	✓	
9	One land owner in overlap area	Sub-District of Membalong, Belitung Regency	-	Direct Interview	12 February 2020	✓	
10	Worker Union (SPSI) of Tanjung Kembiri Mill	PT Forestatestari Dwikarya	-	Direct Interview	10 February 2020	✓	
11	Gender Committee of TKME	Belitung Regency, Province of Kepulauan Bangka Belitung	-	Direct Interview	11 February 2020	✓	
12	Workers Union of PT FLD	Belitung Regency, Province of Kepulauan Bangka Belitung	-	Direct Interview	11 February 2020	✓	
13	Gender Committee of TKMM	Belitung Regency, Province of Kepulauan Bangka Belitung	-	Direct Interview	10 February 2020	✓	
14	Local contractor for FFB transportation works	Belitung Regency, Province of Kepulauan Bangka Belitung	-	Direct Interview	11 February 2020	✓	
15	Contractor for FFB & CPO Transport (PT Satrindo Jaya Agropalma)	Belitung Regency, Province of Kepulauan Bangka Belitung	-	Direct Interview	11 February 2020	✓	
16	Sawit watch	Bogor, Indonesia	<a href="mailto:info@satwitwatch.or.id">info@satwitwatch.or.id</a>	Email	30 January 2020		✓
17	WWF	Jakarta, Indonesia	<a href="http://www.wwf-indonesia.org">www.wwf-indonesia.org</a>	Email	30 January 2020		✓

			<a href="mailto:info@wwf.or.id">@wwf.or.id</a>				
18	WALHI Bangka Belitung	Pangkal Indonesia Pinang,	<a href="mailto:info@walhibabel.or.id">info@walhibabel.or.id</a>	Email	30 January 2020		✓
19	AMAN	Jakarta, Indonesia	<a href="mailto:rumahaman@cbn.net.id">rumahaman@cbn.net.id</a>	Email	30 January 2020		✓
20	<b>TKMM</b> <ul style="list-style-type: none"> <li>Security: 2 Security</li> <li>Loading ramp: 5 workers</li> <li>Sterilizer station: 3 worker</li> <li>Press station: 1 worker</li> <li>Kernel station: 1 worker</li> <li>Boiler station: 3 worker</li> <li>Engine room: 2 worker</li> <li>2 warehouse officer</li> <li>1 hazardous waste warehouse officer</li> <li>1 welder</li> <li>2 Weigh-bridge operators</li> <li>1 operator WTP</li> <li>1 Operator WWTP</li> <li>1 Operator in EBA</li> </ul>	PT Forestalestari Dwikarya	-	Field observation and direct interview	10 February 2020	✓	
21	<b>TKME</b> <ul style="list-style-type: none"> <li>Workshop: 5 workers</li> <li>Storage complex : 2 workers</li> <li>Generator operator : 1 worker</li> <li>Clinic : 2 paramedic</li> <li>Harvesting: 1 Foreman, 1 Harvester and 1 Loosefruit Picker.</li> <li>Pesticide application: 1 Foreman, 1 Pesticide Mixer Boy and 2 Applicators.</li> <li>Land application: 1 Foreman.</li> </ul>	PT Forestalestari Dwikarya	-	Field observation and direct interview	11 February 2020	✓	
22	<b>TRSE</b> <ul style="list-style-type: none"> <li>1 harvester foreman</li> <li>3 harvester</li> <li>3 loose fruit pickers</li> <li>1 spraying foreman</li> <li>4 spraying workers</li> <li>1 maintenance foreman</li> <li>2 maintenance workers</li> </ul>	PT Forestalestari Dwikarya	-	Field observation and direct interview	12 February 2020	✓	

**Appendix 2. Assessment Program**

DATE	10 – 14 February 2020	
PROGRAM	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR / PIC
<b>Monday, 10 February 2020</b>		
06.00 – 07.00 08.00 – completed 08.00 – 11.00  11.00 – 12.00   12.00 – 14.00 14.00 – 17.00	<b>Flight from Jakarta to Tanjung Pandan</b> <b>Government Agency Consultation of Belitung Regency in Tanjung Pandan</b> <b>Pandan Traveling from Tanjung Pandan to PT Forestalestari Dwikarya</b>  <b>Opening Meeting</b> <ul style="list-style-type: none"> <li>Auditee Speech (Introduction of PIC, Profile of Certified Management Unit)</li> <li>Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification)</li> </ul> <b>Break</b> <b>Field Observation of Tanjung Kembiri POM</b> <ul style="list-style-type: none"> <li>Observation of Supply Chain (FFB Receiving, Weighbridge)</li> <li>Observation of FFB grading, Processing Activity, Despatch CPO)</li> <li>Observation of Chemical Storage, Hazardous Waste Storage, Fire Control Simulation</li> <li>Observation of WWTP, WTP, EBA</li> </ul>	<b>All Auditor</b> <b>Amar</b> <b>Faisal, Rindu, Yoga</b>  <b>Management Unit</b>  <b>Faisal / Yoga</b>  <b>All Auditor</b>  <b>Faisal/ Rindu</b>  <b>Amar</b>  <b>Yoga</b>
<b>Tuesday, 11 February 2020</b>		
08.00 – 12.00          12.00 – 14.00 14.00 – 17.00	<b>Stakeholder consultation to affected communities surrounding the Plantation, Smallholders, and previous land owner</b>  <b>Field Observation of Tanjung Kembiri Estate and consultation with internal stakeholder in their respective work locations (Gender Committee, Worker's Union, Worker's Cooperative)</b> <ul style="list-style-type: none"> <li>Observation of HGU poles, and land demarcation.</li> <li>Observation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, IPM, EFB Application)</li> <li>Observation of Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management)</li> <li>Observation of Workers Facilities (Housing, School, Worship Place).</li> <li>Observation of HCV area, POME Land Application.</li> </ul> <b>Break</b> <b>Stakeholder consultation of Local Contractors / FFB suppliers</b>  <b>Continue internal stakeholder consultation if any outstanding (Gender Committee, Worker's Union, Worker's Cooperative)</b>  <b>Document review</b>	<b>Yoga</b>          <b>Faisal/ Rindu</b> <b>Amar</b>  <b>Faisal/ Rindu</b>  <b>Faisal/ Rindu</b>  <b>All Auditor</b> <b>All Auditor</b>  <b>All Auditor</b>
<b>Wednesday, 12 February 2020</b>		
08.00 – 12.00	<b>Field Observation of Tanjung Rusa Estate and consultation with internal stakeholder in their respective work locations (Gender Committee, Worker's Union, Worker's Cooperative)</b>	

DATE	10 – 14 February 2020	
PROGRAM	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR / PIC
	<ul style="list-style-type: none"> <li>• Observation of HGU poles, and land demarcation.</li> <li>• Observation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, IPM, EFB Application)</li> <li>• Observation of Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management)</li> <li>• Observation of Workers Facilities (Housing, School, Worship Place).</li> <li>• Observation of HCV area, POME Land Application.</li> </ul>	<b>Faisal/ Rindu Amar</b>  <b>Faisal/ Rindu Yoga</b>
12.00 – 14.00	<b>Break</b>	<b>All Auditor</b>
14.00 – 17.00	<b>Continue of stakeholder consultation if any outstanding</b>	<b>All Auditor</b>
	<b>Document review</b>	<b>All Auditor</b>
<b>Thursday, 13 February 2020</b>		
08.00 – 12.00	<b>Document review</b>	<b>All Auditor</b>
12.00 – 14.00	<b>Break</b>	<b>All Auditor</b>
14.00 – 17.00	<b>Auditor's Internal discussion of closing meeting preparation</b>	<b>All Auditor</b>
15.00	<b>Deadline of audit documents submission</b>	<b>Management Unit</b>
<b>Friday, 14 February 2020</b>		
08.00 – 10.00	<b>Closing Meeting</b> <ul style="list-style-type: none"> <li>• Presentation of audit findings (Noteworthy Positive Component, Non Conformities, OFI, Timeline of CAR's, Conclusion)</li> <li>• Comments, Responses and Questions</li> </ul>	<b>All Auditor</b>
10.00 – 12.00	<b>Traveling from PT Forestalestari Dwikarya to Tanjung Pandan Flight from</b>	<b>All Auditor</b>
14.00 – 15.00	<b>Tanjung Pandan to Jakarta</b>	