

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

Name of Management Organisation : Gunung Aru Palm Oil Mill, PT Bersama Sejahtera Sakti subsidiary of Sime Darby Plantation Bhd

Plantation Name : PT Bersama Sejahtera Sakti : Gunung Aru Estate, Gunung Kemas Estate, Laut Timur Estate and Pantai Timur Estate.

Location : Betung Village, Sub District of Pulau Laut Timur, District of Kotabaru, Province of South Kalimantan, Indonesia

Certificate Code : **MUTU-RSPO/005**

Date of Certificate Issue : 05 July 2016 Date of License Issue : 01 October 2019

Date of Certificate Expiry : 04 July 2021 Date of License Expiry : 04 July 2020

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA – 1.3	20 – 25 May 2019	Moh Arif Yusni (Lead Auditor), Arif Faisal Simatupang, Afiffuddin, Bayu Yogatama	Ardiansyah	Octo HPN Nainggolan

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA – 1.3	16 September 2019

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Figure 1. Location Map of PT Bersama Sejahtera Sakti

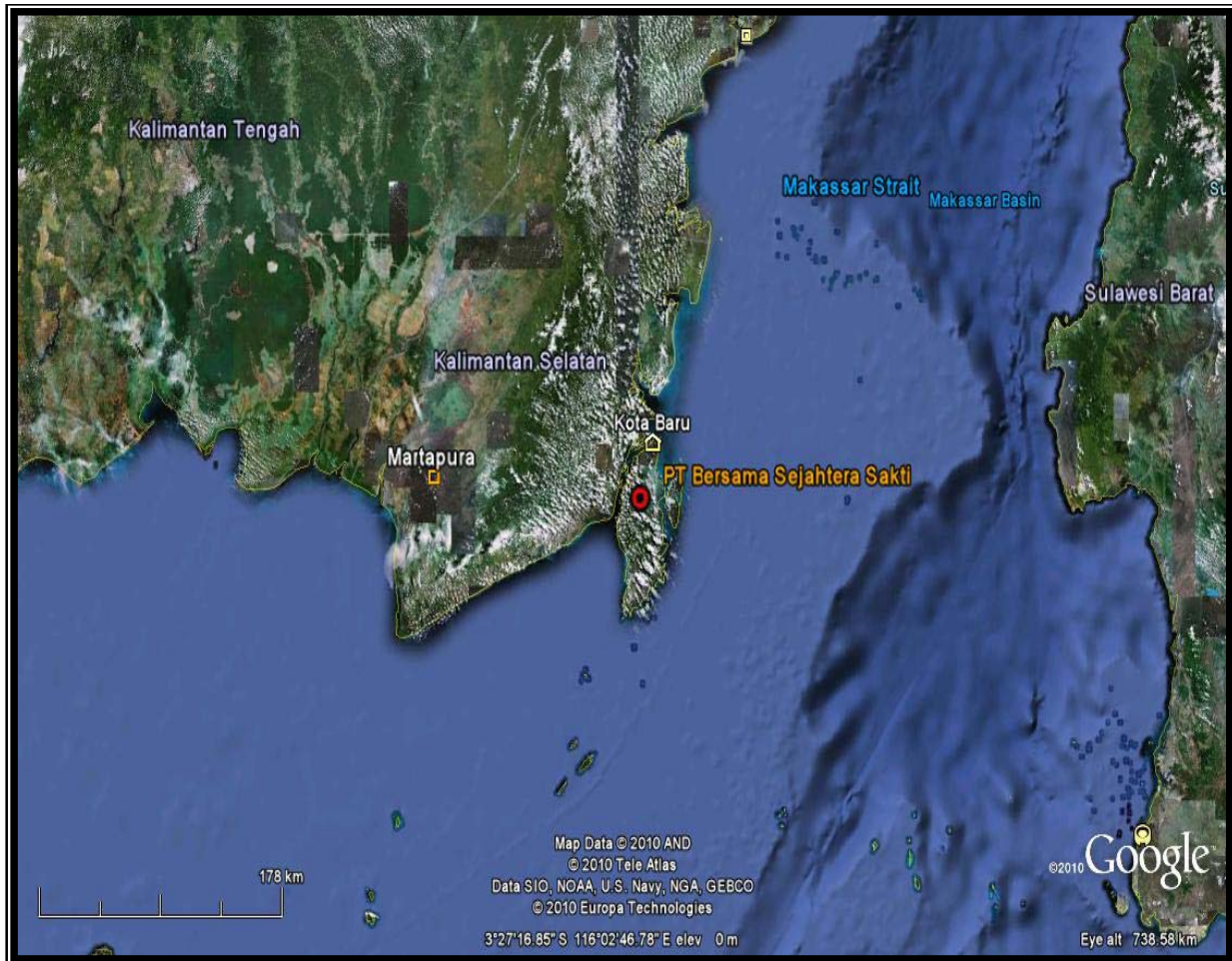
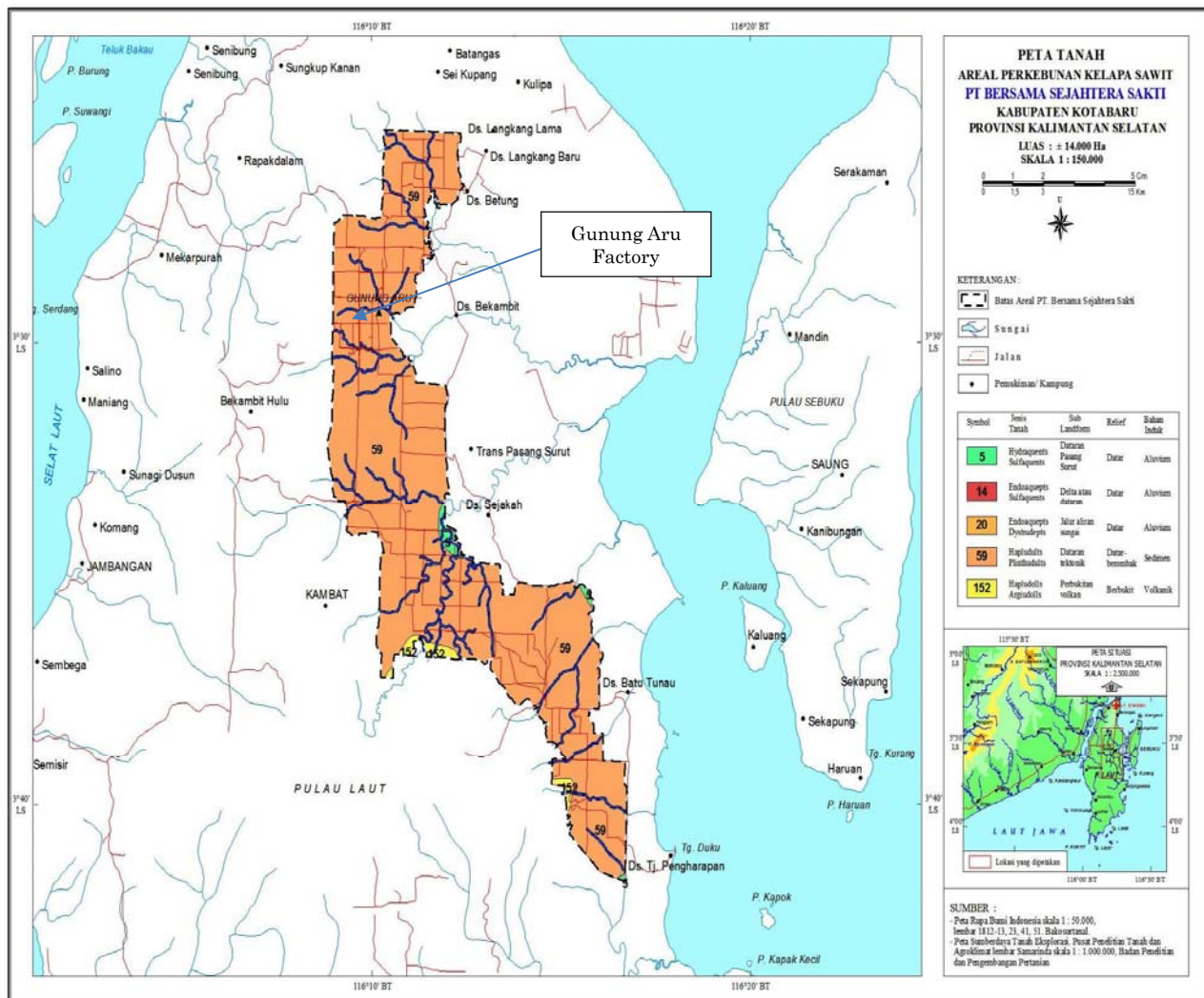


Figure 2. Operational Map of PT Bersama Sejahtera Sakti



Abbreviations Used

AMDAL	:	<i>Analisis Mengenai Dampak Lingkungan</i> (Social and Environmental Impact Assessment)
APAR	:	<i>Alat Pemadam Api Ringan</i> (Fire Extinguisher)
APD (PPE)	:	<i>Alat Perlindungan Diri</i> (Personal Protective Equipment)
B3	:	<i>Bahan Beracun and Berbahaya</i> (Hazardous Material Waste)
BLHD	:	<i>Badan Lingkungan Hidup Daerah</i> (District Environment Body)
BOB	:	Barn On Box
BOD	:	Biological Oxygen Demand
BKSDA	:	<i>Balai Konservasi Sumber Daya Alam</i>
BPN	:	<i>Badan Pertanahan Nasional</i> (National Land Agency)
BPJS	:	Badan Penyelenggara Jaminan Sosial
BSS	:	PT. Bersama Sejahtera Sakti
CD	:	Community Development
CPCL	:	<i>Calon Petani Calon Lahan</i>
CPO	:	Crude Palm Oil
CSR	:	Corporate Social Responsibility
EFB	:	Empty Fruit Bunch
EIA	:	Environmental Impact Assesment
FFB	:	Fresh Fruit Bunch
GAE	:	Gunung Aru Estate
GAF	:	Gunung Aru Factory
GAP	:	Gunung Aru POM
GKE	:	Gunung Kemasan Estate
GHG	:	Green House Gas
HACCP	:	Hazard Analysis Critical Control Point
HCV	:	High Conservation Value (<i>Nilai Konservasi Tinggi</i>)
HGU	:	<i>Hak Guna Usaha</i> . (Land Use Permit)
HIRAC	:	Hazard Identification Risk Assesment & Control
HPT	:	<i>Hama Penyakit Tanaman</i>
ISO	:	International Prganization for Standardization
ISCC	:	International Sustainability & Carbon Certificate
IUP	:	<i>Izin Usaha Perkebunan</i> . (Plantation Operation License)
IPAL (WWTP)	:	<i>Instalasi Penyaluran Air Limbah</i> (Wastewater Treatment Plant)
JAMSOSTEK	:	<i>Jaminan Sosial Tenaga Kerja</i> (Social Assurance of Labor)
K3(OHS)	:	<i>Keselamatan dan Kesehatan Kerja</i> (Occupational Health and safety)
KLH	:	<i>Kementrian Lingkungan Hidup</i> (Environment Ministry)
KSS	:	<i>Kalimantan Selatan Sulawesi</i>
KUD	:	<i>Koperasi Unit Desa</i> (Cooperative Village Unit)
LC	:	Land Clearing
LCC	:	Legume Cover Crop
LUCA	:	Land Use Change Analysis
LTE	:	Laut Timur Estate
LSU	:	Leaf Sampling Unit
MCU	:	Medical Check up
MMCM	:	Minamas Management Committee Meeting
MSDS	:	Material Safety Data Sheet
OHS	:	Occupational Health & Safety
OER	:	Oil Extraction Rate
PHT	:	<i>Pengendalian Hama Terpadu</i> (Integrated Pest Management)
PK	:	Palm Kernel

PKO	:	Palm Kernel Oil
PKS (<i>POM</i>)	:	<i>Pabrik Kelapa Sawit</i> (Palm Oil Mill)
PP	:	<i>Peraturan Pemerintah</i> (Government Regulation)
PPE	:	Personal Protective Equipment
PTE	:	Pantai Timur Estate
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluents
PPLH	:	<i>Pusat Penelitian Lingkungan Hidup</i>
RKL/RPL	:	<i>Rencana Kelola Lingkungan/ Rencana Pemantauan Lingkungan</i> (Environmental Management Plan/ Environment Monitoring Plan)
RKS/RPS	:	<i>Rencana Kelola Sosial/ Rencana Pemantauan Sosial</i> (Social Management Plan/ Social Monitoring Plan)
PSD	:	Plantation Services Department
PSQM	:	Plantation Sustainability and Quality Management
SOP	:	Standard Operating Procedure
SOU	:	Strategic Operating Unit
SP	:	<i>Serikat Pekerja</i> (Worker Union)
SPK	:	<i>Surat Perjanjian Kerja</i> (Minutes of Agreement)
TBS (<i>FFB</i>)	:	<i>Tandan Buah Segar</i> (Fresh Fruit Bunches)
WLTK	:	<i>Wajib Laporkan Tenaga Kerja</i> (Labor compulsory report)
UKL/UPL	:	<i>Upaya Kelola Lingkungan/ Upaya Pemantauan Lingkungan</i> (Environmental Management Efforts/ Environmental Monitoring Efforts)

1.0	SCOPE of the CERTIFICATION ASSESSMENT						
1.1	Assessment Standard Used	<ul style="list-style-type: none"> • <i>Indonesian National Interpretation of RSPO P&C 2013 by INA-NITF (Indonesian National Interpretation Task Force) July 2016, endorsed by the RSPO BoG 30th September 2016.</i> • <i>RSPO Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014 revised on 14 June 2017 (Module D / E for CPO Mill)</i> • <i>RSPO Certification System for Principles and Criteria, 14 June 2017</i> 					
1.2	Organisation Information						
1.2.1	Organization name listed in the certificate	PT Bersama Sejahtera Sakti subsidiary of SIME DARBY PLANTATION BHD					
1.2.2	Contact person	Men Kon Tang					
1.2.3	Organisation address and site address	<ul style="list-style-type: none"> • Company RSPO Registered: Level 3A, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7, Ara Damansara, 47301 Petaling Jaya, Selangor, Malaysia • Indonesia Liasion Office The Plaza Office Tower Lantai 36 JI MH Thamrin Kav. 28-30 Jakarta 10350 					
1.2.4	Telephone	+62-21-29926000					
1.2.5	Fax	+62-21-29926000					
1.2.6	E-mail	alagendran.maniam@simedarbyplantation.com					
1.2.7	Web page address	http://www.simedarbyplantation.com/					
1.2.8	Management Representative who completed the application for certification	Alegandran Maniam (Head of PSQM Indonesia)					
1.2.9	Registered as RSPO member	1-0008-04-000-00 – 6 September 2004					
1.3	Type of Assessment						
1.3.1	Scope of Assessment and Number of Management Unit	PT. Bersama Sejahtera Sakti <ul style="list-style-type: none"> • One (1) unit Palm Oil Mill – Gunung Aru POM and four (4) units supply bases – Gunung Aru Estate, Gunung Kemasan Estate, Laut Timur Estate, Pantai Timur Estate. 					
1.3.2	Type of certificate	Single					
1.4	Locations of Mill and Plantation						
1.4.1	Location of Mill						
	Name of Mill	Location	Coordinate <table border="1"> <tr> <td>Latitude</td> <td>Longitude</td> </tr> <tr> <td>S 03° 29' 41"</td> <td>E 116° 10' 00"</td> </tr> </table>	Latitude	Longitude	S 03° 29' 41"	E 116° 10' 00"
Latitude	Longitude						
S 03° 29' 41"	E 116° 10' 00"						
	Gunung Aru	Betung Village, Sub District of Pulau Laut Timur, District of Kotabaru, South					

		Kalimantan Province, Indonesia.				
1.4.2	Location of Certification Scope of Supply Base					
	Name of Supply Base	Location	Coordinate			
			Latitude	Longitude		
	Gunung Aru Estate	Betung Village, Sub District of Pulau Laut Timur, District of Kotabaru, South Kalimantan Province, Indonesia.	S 03° 30' 15"	E 116° 09' 47"		
	Gunung Kemasan Estate	Betung Village, Sub District of Pulau Laut Timur, District of Kotabaru, South Kalimantan Province, Indonesia.	S 03° 31' 48"	E 116° 11' 00"		
	Laut Timur Estate	Betung Village, Sub District of Pulau Laut Timur, District of Kotabaru, South Kalimantan Province, Indonesia.	S 03° 35' 49"	E 116° 12' 18"		
Pantai Timur Estate	Betung Village, Sub District of Pulau Laut Timur, District of Kotabaru, South Kalimantan Province, Indonesia.	S 03° 36' 24"	E 116° 13' 26"			
1.5	Description of Area Statement					
1.5.1	Tenure					
	• State		12,740.54 Ha			
	• Community		- Ha			
1.5.2	Area Statement					
	Total area		12,740.54	Ha		
	Mature Area		9,307.75	Ha		
	immature area		2,319.86	Ha		
	Mill		37.55	Ha		
	Emplacements		131.59	Ha		
	Infrastructure		519.75	Ha		
	Water catchment		21.64	Ha		
	Nursery		24.24	Ha		
	HCV		91.46	Ha		
	Conservation Area			Ha		
	• Rocky Area		58.68	Ha		
	• River		135.27	Ha		
	• Swamp		89.75	Ha		
	Security trench		3.00	Ha		
• Total HCV area are 571.12 Ha; most of the river border has already been planted. HCV Area: 91.46 Ha; River: 135.27 Ha; Riparian Zone (Planted area): 344.39 Ha.						
1.6	Planting Year and Cycles					
1.6.1	Age profile of planting year					
	Planting Year	Hectarage (Ha)				
		Gunung Aru Estate	Gunung Kemasan Estate	Laut Timur Estate	Pantai Timur Estate	Total
		1992		62.98		62.98
1994		83.96	80.89		164.85	

	1995			122.33	303.40	425.73	
	1996		128.21	864.74	925.15	1,918.10	
	1997		49.61		249.91	299.52	
	1998		45.43	178.98		224.41	
	1999					-	
	2000		214.91		106.17	321.08	
	2001					-	
	2003			56.53	121.21	177.74	
	2005		54.11	54.62	104.78	213.51	
	2006				452.56	452.56	
	2007				426.66	426.66	
	2010	270.56				270.56	
	2012	324.41				324.41	
	2013	424.65	247.10			671.75	
	2014	400.86	489.22			890.08	
	2015	461.27	533.52	354.53		1,349.32	
	2016	199.86	464.12	450.51		1,114.49	
	Sub Total Mature	2,081.61	2,373.17	2,163.13	2,689.84	9,307.75	
	2017	193.04	319.48	456.65	50.47	1,019.64	
	2018	132.22	206.59	285.75	280.02	904.58	
	2019		230.50	97.98	67.16	395.64	
	Sub Total Immature	325.26	756.57	840.38	397.65	2,319.86	
	TOTAL	2,406.87	3,129.74	3,003.51	3,087.49	11,627.61	
1.6.2	New Planting area after January 2010		-			Ha	
1.6.3	Planting Cycle		2 nd Cycle				
1.7	Description of Mill and Supply Base						
1.7.1	Description of Mill						
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel	
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)
	Gunung Aru	40	159,139.17	34,199.26	21.49	7,197,04	4.52
	<i>*Production data source from 12 months before assessment (May 2018 - April 2019)</i> <i>*The discrepancy between FFB Received and FFB Process is due to restan of production which caused by mill maintenance.</i>						
1.7.2	Description of Certification Scope of Supply Base						
	Name of Estate	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/ year)	Supplied to Mill	
						FFB (tonnes/year)	%
	Gunung Aru	2,684.41	2,406.87	31,048.05	12.90	31,048.05	100

	Gunung Kemas	3,511.36	3,129.74	27,957.31	8.93	27,957.31	100
	Laut Timur	3,207.28	3,003.51	31,852.89	10.61	31,852.89	100
	Pantai Timur	3,337.49	3,087.49	57,577.48	18.65	57,577.48	100
	TOTAL	12,740.54	11,627.61	148,435.73	12.77	148,435.73	100
	<i>*Production data source from 12 months before assessment (May 2018 - April 2019)</i>						
1.7.3	FFB description from other source						
	Name of sources/Organisation (RSPO certified / non-certified)	Type of Organisation	number of smallholders	Production Area (Ha)	Supplied to Mill FFB (tonnes/year)		
	KUD Maju Bersama (Non certified)	Scheme Smallholders of PT BSS	450	881.37	2,326.110		
	Outgrower (Non certified)				7,933.551		
	TOTAL				10,259.661		
	<i>*Production data source from 12 months before assessment (May 2018 - April 2019)</i>						
1.7.4	Product categories			FFB, CPO, PK			
1.8	Tonnage of Product						
1.8.1	Past Annual Claim Certified Product		Last Year Projected Certified Volume (MT)		Last Year Actual Certified Volume (May 2018 - April 2019) (MT)		
	FFB Processed		128,291		148,435.73		
	CPO Production		26,299		32,238.33		
	Palm Kernel (PK) Production		6,158		6,865.34		
	<i>the company cannot show evidence regarding FFB Received, CSPO Produced and CSPK Produced Its became Non Conformity No 2019.07 With Major Category</i>						
1.8.2	Product selling						
	Type of selling product		Actual selling product for last year (May 2018 - April 2019) (MT)				
	CSPO sold as RSPO certified product						
	CSPK sold as RSPO certified product		2,139.01				
	CSPO sold under other scheme		-				
	CSPK sold under other scheme		-				
	CSPO sold as conventional		29,784.27				
	CSPK sold as conventional		4,053.41				
	<i>the company cannot show evidence regarding (1)Sales data for certified and non-certified CPO products; (2)Sales data for certified and non-certified PK products. Its became Non Conformity No 2019.07 With Major Category; No 2019.08 With Major Category; No 2019.09 With Major Category</i>						
1.8.3	Estimate of Certified FFB Claim						
	Name of Estate(s)	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)		
	Gunung Aru	2,684.41	2,406.87	34,899	14.50		
	Gunung Kemas	3,511.36	3,129.74	35,992	11.50		
	Laut Timur	3,207.28	3,003.51	36,042	12.00		
	Pantai Timur	3,337.49	3,087.49	61,750	20.00		
	TOTAL	12,740.54	11,627.61	168,684	14.51		
	<i>*Projected FFB production for 05 July 2019 – 04 July 2020</i>						

1.8.4	Estimate of Certified Palm Product Claim							
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel		Supply Chain Module
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)	
	Gunung Aru Factory	40	168,684	37,954	22.5	8,012	4.75	MB
<i>*Projected FFB production for 05 July 2019 – 04 July 2020</i>								
1.9	Other Certifications							
	ISO 9001:2008			-				
	ISO 14001: 2004			-				
	OHSAS 18001:2007			-				
	ISCC			-				
	Others			PT. Bersama Sejahtera Sakti has obtained ISPO Certificate (Certificate Number SGS-ID-ISPO-0008) valid from 6 December 2016 until 5 December 2021.				
1.10	Time Bound Plan							
1.10.1	Time Bound Plan for Other Management Units							
	Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status		
	Mill	Time bound						
	INDONESIA							
1	Sekunyr. PT. Indotruba Tengah	2010	Sekunyr	2010	Seruyan and West Kotawaringin District – Central Kalimantan	Certified		
			Seruyan	2010		Certified		
2	Manggala. PT. Tungal Mitra Plantations	2010	Manggala 1	2010	Rokan Hilir District – Riau	Certified		
			Manggala 2	2010		Certified		
			Manggala 3	2010		Certified		
3	Bukit Ajong PT. Sime Indo Agro	2010	West	2010	Sanggau District – West Kalimantan	Certified		
			West (HGU on process)	2019		-		
			East	2010		Certified		
			East (HGU on process)	2019		-		
			East Plasma	2010		Certified		
			West Plasma	2010		Certified		
			Sei Mawang	2019		-		
4	Teluk Siak. PT Aneka Inti Persada	2011	Teluk Siak	2011	Siak District – Riau	Certified		
			Pinang Sebatang	2011		Certified		
			Aneka Persada	2011		Certified		
5	Sungai Pinang. PT. Bina Sains Cemerlang	2012	Sungai Pinang	2012	Musi Rawas District – South Sumatera	Certified		
			Sungai Pinang (HGU on process)	2020		-		
			Bukit Pinang	2012		Certified		

			Bukit Pinang (HGU on process)	2020		-
6	Pematang. PT. Teguh Sempurna	2011	Pematang	2011	Seruyan and East Kotawaringin District – Central Kalimantan	Certified
			Kawan Batu	2011		Certified
			Hatan Tiring	2011		Certified
			Batang Garing	2011		Certified
7	Alur Dumai. PT Lahan Tani Sakti	2011	Alur Dumai	2011	Rokan Hilir District – Riau	Certified
8	Teluk Bakau. PT. Bhumireksa Nusa Sejati	2011	Teluk Bakau	2011	Indra Giri Hilir District – Riau	Certified
			Nusa Perkasa	2011		Certified
			Nusa Lestari	2011		Certified
9	Mandah PT. Bhumireksa Nusa Sejati	2014	Mandah	2011	Indra Giri Hilir District – Riau	Certified
			Rotan Semelur	2011		Certified
10	Angsana. PT Ladangrumpun Suburabadi	2011	Angsana	2011	Tanah Bumbu District – South Kalimantan	Certified
			Gunung Sari	2011		Certified
			Pantai Bonati	2011		Certified
			KKPA-1 PT.SHE	2013		Certified
			KKPA-4 PT.SHE	2013		Certified
11	Mustika. PT Sajang Heulang	2013	Mustika	2013	Tanah Bumbu District – South Kalimantan	Certified
			KKPA-2 PT.SHE	2013		Certified
			KKPA-3 PT.SHE	2013		Certified
			KKPA-5 PT.SHE	2013		Certified
			SAP 1	2020		-
12	Gunung Aru. PT Bersama Sejahtera Sakti	2011	Gunung Aru	2011	Kotabaru District – South Kalimantan	Certified
			Gunung Kemas	2011		Certified
			Laut Timur	2011		Certified
			Pantai Timur	2011		Certified
			KKPA BSS	2020		-
13	Bebunga. PT. Langgeng Muaramakmur	2011	Bebunga	2011	Kotabaru District – South Kalimantan	Certified
			Bakau	2011		Certified
			Sungai Cengal	2011		Certified
14	Sukamandang PT Kridatama Lancar	2011	Sukamandang	2011	Seruyan and East Kotawaringin District – Central Kalimantan	Certified
			Sapiri	2011		Certified
			Barasdanum	2011		Certified
			Kuala Kuayan	2011		Certified
15	Pondok Labu. PT Paripurna Swakarsa	2012	Binturung	2012	Kotabaru District – South Kalimantan	Certified
			Pondok Labu	2012		Certified
			Rampa	2012		Certified
			Sesulung	2012		Certified

16	Rantau. PT Laguna Mandiri	2012	Rantau	2012	Kotabaru District – South Kalimantan	Certified
			Matalok	2012		Certified
			KKPA Sungai Cengal (1,382 SH)	2014		Certified
			Selabak (PT SAA)	2012		Certified
			Randi (PT SAA)	2012		Certified
			Sangkoh (PT SAA)	2012		Certified
			Lanting (PT LMR)	2012		Certified
17	Betung. PT Laguna Mandiri	2014	Betung	2012	Kotabaru District – South Kalimantan	Certified
			Sekayu	2012		Certified
18	Ungkaya. PT Tamaco Graha Krida	2012	Ungkaya	2012	Morowali District – Sulawesi Tengah	Certified
			Plasma TGK	2020		-
19	Ladang Panjang. PT Bahari Gembira Ria	2012	Ladang Panjang	2012	Muaro Jambi District - Jambi	Certified
			Ladang Panjang (HGU on process)	2020		-
			Plasma BGR	2020		-
20	Rantau Panjang. PT Guthrie Peconina Indonesia	2012	Rantau Panjang	2012	Musi Banyuasin District – South Sumatera	Certified
			Rantau Panjang (HGU on process)	2020		-
			Bumi Ayu	2012		Certified
			Karang Ringin	2012		Certified
			Napal	2012		Certified
			Napal (HGU on process)	2020		-
			Mangun Jaya	2012		Certified
			Mangun Jaya (HGU on process)	2020		-
			Sungai Jernih	2020		-
			GPI KKPA	2020		-
21	Blang Simpo. PT Perkasa Subur Sakti	2013	Tamiang (PT PPP)	2013	Aceh Tamiang and East Aceh District – Aceh	Certified
			Batang Ara (PT PSK)	2013		Certified
			Blang Simpo-01	2013		Certified
			Blang Simpo-02	2013		Certified
22	Lembiru. PT Sandika Nata Palma	2014	Lembiru	2014	Ketapang District – West Kalimantan	Certified
			Awatan	2014		Certified
			Karya Palma	2019		-
			KKPA SNP	2020		-
			Pelanjau (PT BAL)	2019		IC
			Sungai Putih (PT BAL)	2019		-
			Baturus (PT BAL)	2019		-
			KKPA BAL	2020		-

MALAYSIA						
1	Sg Dingin SOU 1	2010	Bukit Hijau	2010	Kerangan, Kedah	Certified
			Padang Buluh	2010		Certified
			Bukit Selangor	2010		Certified
			Sg Dingin	2010		Certified
			Jentayu	2010		Certified
			Anak Kuli	2010		Certified
			Somme	2010		Certified
2	Chersonese SOU 2	2011	Chersonese	2011	Kuala Kurau, Perak	Certified
			Holyrood	2011		Certified
			Kalumpang	2011		Certified
			Tali Ayer	2011		Certified
3	Elphil SOU 3	2011	Kinta Kellas	2011	Sg Siput, Perak	Certified
			Elphil	2011		Certified
			Kamuning	2011		Certified
4	Flemington SOU 4	2011	Flemington	2011	Teluk Intan, Perak	Certified
			Bagan Datoh	2011		Certified
			Sabak Bernam	2011		Certified
			Sg Samak	2011		Certified
5	Seri Intan SOU 5	2011	Seri Intan (Main Division)	2011	Teluk Intan, Perak	Certified
			Sabrang	2011		Certified
			Sg Wangi	2011		Certified
			Sogomana (Main Division)	2011		Certified
6	Selaba SOU 5	2011	Seri Intan (Selaba Division)	2011	Teluk Intan, Perak	Certified
			Sogomana (Cashwood & Sg Beruas Division)	2011		Certified
			Bikam	2011		Certified
			Clumy	2011		Certified
7	Tennamaram SOU 6	2011	Tennamaram	2011	Bestari Jaya, Selangor	Certified
			Sungei Buloh	2011		Certified
			Bkt Talang	2011		Certified
8	Bkt Kerayong SOU 7	2011	Bkt Kerayong	2011	Kapar, Selangor	Certified
			Bkt Cherakah	2011		Certified
			Bkt Rajah	2011		Certified
			Bkt Lagong	2011		Certified
			Elmina	2011		Certified
9	East	2010	East	2010	Carey Island, Selangor	Certified

	SOU 8		Dusun Durian	2010		Certified
			Sepang	2010		Certified
10	West - SOU 9	2010	West	2010	Carey Island, Selangor	Certified
11	Bukit Putri - SOU 10	2011	Bukit Putri	2011	Raub, Pahang	Certified
12	Kerdau SOU 11	2011	Kerdau	2011	Temerloh, Pahang	Certified
			Jentar	2011		Certified
			Mentakab	2011		Certified
			Sg Mai	2011		Certified
			Chenor	2011		Certified
13	Jabor - SOU 12	2011	Jabor	2011	Kuantan, Pahang	Certified
14	Labu SOU 13	2011	Labu	2011	Nilai, Negeri Sembilan	Certified
			New Labu	2011		Certified
			Bradwall	2011		Certified
15	Tanah Merah SOU 14	2010	Tanah Merah	2010	Port Dickson, Negeri Sembilan	Certified
			Sua Betong	2010		Certified
			Bukit Pelandok	2010		Certified
16	Sua Betong SOU 15	2014	Salak	2014	Port Dickson, Negeri Sembilan	Certified
			Sengkang	2014		Certified
			Siliau	2014		Certified
			PD Lukut	2014		Certified
			Sungai Baru	2014		Certified
			Tampin Linggi	2014		Certified
17	Kok Foh SOU 16	2011	Bukit Pilah	2011	Bahau, Negeri Sembilan	Certified
			Kok Foh	2011		Certified
			Muar River	2011		Certified
			St. Helier	2011		Certified
			Pertang	2011		Certified
			Sg Gemas	2011		Certified
			Sg Sebalang	2011		Certified
			Sg Senarut	2011		Certified
18	Kempas SOU 17	2010	Kempas	2010	Jasin, Melaka	Certified
			Kemuning	2010		Certified
			Tangkah	2010		Certified
19	Diamond Jubilee SOU 18	2011	Bukit Asahan	2011	Jasin, Melaka	Certified
			Diamond Jubilee	2011		Certified
			Serkam	2011		Certified
20	Pagoh SOU 19	2014	Pagoh	2014	Muar, Johor	Certified
			Lanadron	2014		Certified

			Pengkalan Bukit	2014		Certified
			Welch	2014		Certified
21	Chaah SOU 20	2010	North Labis	2010	Chaah, Johor	Certified
			Cha'ah	2010		Certified
			Sg Simpang Kiri	2010		Certified
22	Gunung Mas SOU 21	2010	Gunung Mas	2010	Kluang, Johor	Certified
			Kempas Klebang	2010		Certified
			Bukit Paloh	2010		Certified
			Yong Peng	2010		Certified
23	Bukit Benut SOU 22	2011	Bukit Benut	2011	Kluang, Johor	Certified
			CEP Niyor	2011		Certified
			Lambak / Elaeis	2011		Certified
24	Ulu Remis SOU 23	2011	Pekan	2011	Layang-layang, Johor	Certified
			Sembrong	2011		Certified
			Tun Dr. Ismail	2011		Certified
			Ulu Remis	2011		Certified
			Bukit Badak	2011		Certified
			Cenas	2011		Certified
25	Hadapan SOU 24	2011	CEP Rengam	2011	Layang-layang, Johor	Certified
			Kulai	2011		Certified
			Layang	2011		Certified
			Seri Pulai	2011		Certified
26	Sandakan Bay SOU 26	2008	Tun Tan Siew Sin	2008	Sandakan, Sabah	Certified
			Tunku	2008		Certified
			Tigowis	2008		Certified
			Sentosa	2008		Certified
			Saguliud	2008		Certified
27	Melalap SOU 27	2011	Melalap	2011	Tenom, Sabah	Certified
			Sapong	2011		Certified
28	Binuang SOU 28	2009	Tingkeyu	2009	Kunak, Sabah	Certified
			Sungang	2009		Certified
			Jelata Bumi	2009		Certified
			Binuang	2009		Certified
29	Giram SOU 29	2009	Mostyn	2009	Kunak, Sabah	Certified
			Giram	2009		Certified
30	Merotai SOU 30	2009	Imam	2009	Tawau, Sabah	Certified
			Merotai	2009		Certified
			Table	2009		Certified

			Tiger	2009		Certified
31	Lavang SOU 31	2011	Belian	2011	Bintulu, Serawak	Certified
			Kelida	2011		Certified
			Lavang	2011		Certified
			Lavang (SE)	2011		Certified
			Rasan	2011		Certified
			Chartquest	2011		Certified
			Dulang	2011		Certified
			Peroh	2011		Certified
			Pekaka	2011		Certified
			Ruai	2011		Certified
32	Rajawali SOU 32	2011	Rajawali	2011	Bintulu, Serawak	Certified
			Samudera	2011		Certified
			Semarak	2011		Certified
			Bayu	2011		Certified
33	Derawan SOU 33	2011	Takau	2011	Bintulu, Serawak	Certified
			Damai	2011		Certified
			Derawan	2011		Certified
			Sahua	2011		Certified
	LIBERIA					
1	Grand Cape Mount	2018	Matambo	2018	Grand Cape Mount, Liberia	IC
			Grand Cape Mount	2018		IC
			Zodua	2018		IC
			Bomi	2018	Bomi, Liberia	IC
			Lofa	2018		IC
	P & G (New Britain Palm Oil)					
1	Poliamba	2012	Kara	2012	Kevieng, New Ireland Province, P&G	Certified
			West Coast	2012		Certified
			Nalik	2012		Certified
			Noatsi	2012		Certified
			Madak	2012		Certified
			North (Smallholders)	2012		Certified
			South (Smallholders)	2012		Certified
			West (Smallholders)	2012		Certified
2	Tetere	2011	Tetere	2011	Gudaicanal, Slomon Island	Certified
			Ngalimbiu	2011		Certified
			Mbalisuna	2011		Certified

			West Zone (Smallholders)	2011		Certified
			Central Zone (Smallholders)	2011		Certified
			MBA East (Smallholders)	2011		Certified
			MBA West (Smallholders)	2011		Certified
3	Sangara, Sambiripa & Mamba	2013	Sangara	2013	Higaturu, Popondetta, Oro, P&G	Certified
			Sumberipa	2013		Certified
			Ambogo	2013		Certified
			Embi	2013		Certified
			Mamba	2013		Certified
			Sorovi (smallholders)	2013		Certified
			Igora (smallholders)	2013		Certified
			Saiho (smallholders)	2013		Certified
			Aeka (smallholders)	2013		Certified
			Ilimo (smallholders)	2013		Certified
4	Gusap	2010	Dumpu	2010	Madang, P&G	Certified
			Surinam	2010		Certified
			Jephcott	2010		Certified
			Gusap	2010		Certified
			Paddox	2010		Certified
			Ngaru	2010		Certified
			Madang VOP (smallholders)	2010		Certified
			Morobe VOP (smallholders)	2010		Certified
5	Hagita	2013	Giligili	2013	Milne Bay, P&G	Certified
			Hagita	2013		Certified
			Waigani	2013		Certified
			Sagarai	2013		Certified
			Padipadi	2013		Certified
			Mariawatte	2013		Certified
			East Gurney	2013		Certified
			West Gurney	2013		Certified
			East Sagarai	2013		Certified
			West Sagarai	2013		Certified
6	Mosa Kumbango Kapiura Namumdo Waraston	2008	Bebere	2008	West New Britain	Certified
			Kumbango	2008		Certified
			Togulo	2008		Certified
			Dami	2008		Certified

		Waisisi	2008	Certified
		Kautu	2008	Certified
		Karaus	2008	Certified
		Moroa	2008	Certified
		Bilomi	2008	Certified
		Loata	2008	Certified
		Haella	2008	Certified
		Garu	2008	Certified
		Daliavu	2008	Certified
		Sapuri	2008	Certified
		Malilimi	2008	Certified
		Rigula	2008	Certified
		Nomundo	2008	Certified
		Navarai / Karato ME	2008	Certified
		Volupai . Lotomgam / Natupi / Goruru	2008	Certified
		Lolokoru	2008	Certified
		Silovoti	2008	Certified
		LSS Hoskin (1,877 Smallholders)	2008	Certified
		VOP East (1,815 Smallholders)	2008	Certified
		VOP Central (1,958 Smallholders)	2008	Certified
		VOP West (1,277 Smallholders)Kaulong / Akamie / Pusiki / Repamira / Sakapei / KDC ME (21 large smallholders)	2008	Certified
		LSS Kapiura (847 Smallholders)	2008	Certified
		VOP Kapiura (551 Smallholders)	2008	Certified
	<p>Sime Darby has achieved 34 management units in Malaysia, 25 management units in Indonesia, 10 management units in P&G that RSPO certified. Total management unit in Sime Darby Plantation Bhd are 34 in Malaysia, 25 in Indonesia and 10 in P&G. In the year of 2016 & 2017 there are three Mill that are no longer operating, and for the supplying base (Estate) is diverted to a mill that is still operating and has been certified RSPO. The mills are:</p> <ol style="list-style-type: none"> 1. Angsana Mini Mill, PT Sajang Heulang: Mill stop operate since 2016 and the supply bases is transfer to Angsana POM, PT Ladangrumpun Subur Abadi. 2. Selabak Mill, PT Swadaya Andhika: Mill stop operate since.2017 and the supply bases is transfer to Rantau POM, PT Laguna Mandiri 3. Pekaka, SOU 34: Mill stop operate since 2017 and the supply bases is transfer to Lavang, SOU 31 <p>A new mill will be set up in Liberia and planned for commissioning in February 2016. Preparation to undergo the RSPO Certification process is in progress and Sime Darby Plantation Bhd targets to undergo RSPO Certification by end 2017. RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed on 2018.</p>			

	Sime Darby has informed the Time Bound Plan progress, MUTU has consider that Sime Darby still comply with the RSPO requirement for partial certification.
1.10.2	Progress of Associated Smallholders and Outrowers for Certifiable Standard
	The scheme of smallholder are planned on 2020 its due to the scheme of smallholder send FFB to Gunung Aru Factory started in October 2018

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA 1.3	<p>1. Moh Arif Yusni (Lead Auditor). Indonesian citizen. Bachelor of Agriculture, majoring in Plant Protection. Has experience as an operational staff at a private oil palm plantation company in Indonesia on 2010 to 2012. Has attended several trainings, i.e.: ISO 19011, ISO 9001; ISO 14001, SA 8000, RSPO lead auditor, ISPO lead auditor, OHS expert, OHS auditor based on National Government No. 50/2012, SCCS, etc. Has conducting ISPO, RSPO and MSPO audit as an auditor and lead auditor with expertise on best management practices for estate and mill, legality, worker welfare, safety, social, environment, conservation, transparency, long term economic management plan and supply chain for palm oil mill aspects. During the audit, he verified OHS, Best Management Practices for mill and estate, legal, social aspect and land conflict.</p> <p>2. Arif Faisal Simatupang (Auditor). Bachelor of Agriculture, from Department of Agriculture Agronomy, Faculty of Agriculture, University of Gadjah Mada. He has successfully completed an RSPO endorsed P&C Lead Auditor Training, RSPO SCCS endorsed Lead Auditor Training, Indonesian Sustainable Palm Oil (ISPO) Lead Auditor Training, Management System Certification ISO 9001-2008 Lead Auditor Training, Environmental Management System ISO 14001 Lead Auditor Training, ISO 17021 and ISO 17065 Awareness Training, Management of High Conservation Value (HCV) Training, Social Accountability SA 8000 Training. He has four years of working experience as a Field Assistant on oil palm Plantation Company in Indonesia. Since 2014, he works as an auditor of RSPO and ISPO in the aspects of legal, social, best management practices of mill and estate, OHS, employment, and environmental. In this audit he is responsible for assessing the aspects of worker welfare and transparency, and SCCS.</p> <p>3. Afiffuddin (Auditor Trainee). Indonesian citizen, Diploma III majoring Palm Oil Plantation, Bogor Agricultural University. Five years working experience since 2010 at Oil Palm Plantation Company in Indonesia as agronomy operational staff and followed several trainings namely: Basic Plantation Management Program, Auditor Training Indonesian Sustainable Palm Oil (ISPO), Training of RSPO lead auditor, OHS General Expert, OHS System Management based on PP 50 2012 and Management System Certification (ISO 9001-2015/SNI 19011-9001:2015) ISO 17021, ISO 17065, SA 8000 training. He has been involved in several audit activities related to sustainable palm oil certification since 2016 covering Best Management Practices aspect, health and safety aspect and worker welfare aspect. During this audit, He conducted an assessment on worker welfare and OHS under supervise of Moh Arif Yusni</p> <p>4. Bayu Yogatama (Auditor). 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 audit, he verify Environmental Aspect, HCV, Green House Gases and Social.</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA 1.3	<p>Number of auditors : 3 auditor and 1 Trainee auditor</p> <p>Number of days for ASA-1.3 at site : 5 days</p> <p>Number of working days for ASA-3 at site : 15 Working days</p>
2.2.2	Assessment Process
ASA 1.3	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Bersama Sejahtera Sakti to the requirements of RSPO Principles and Criteria for Sustainable Palm Oil Production of Sustainable Palm Oil 2013 for Indonesia July 2016, approve RSPO Governors September 30, 2016 and Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014, Revised June 2017 (Module D for CPO Mill).</p> <p>The audit program is included as Appendix II. The approach to the audit was to treat the mill and its supply base as</p>

an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

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

Team of auditor started their trip from Jakarta to Kotabaru (South Kalimantan) and continued to site. Once arrived, team auditor conducted Opening Meeting in the Meeting Room of Gunung Aru Estate and this was attended by Mill Manager, Estate Manager Senior Assistant, the Assistant, the Head of Administration, Sustainability staff and the other related personnel.

Public Stakeholder Notification was made on PT Mutuagung Lestari Website No written negative feedback receive. Stakeholder consultation involved internal and external stakeholders.

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

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

Closing Meeting conducted the Meeting Room of Gunung Aru Estate and this was attended by Mill Manager, Estate Manager Senior Assistant, the Assistant, the Head of Administration, Sustainability staff and the other related personnel. During the closing meeting there is no rejection / grievance of unit management.

Some opportunities for improvement of the results [ASA 1.3](#) delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase ASA 1.4. Improvement of findings from main assesment findings were observed by auditors at this [ASA 1.3](#) assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of [ASA 1.3](#)

The assessment program please find Appendix 2

2.2.3	Locations of Assessment
ASA 1.3	<p>The sampling location consider the issue arose from the review documents and stakeholder's consultation that are fundamental and crucial. On this assessment sample locations that visited and respondent that interviewed by team auditor are:</p> <p>GUNUNG ARU FACTORY</p> <ul style="list-style-type: none"> - Security Post and Weighbridge. Observation and interview related FFB receiving, recording in accordance with SCCS requirements. - Loading Ramp. Observations and interviews with grading worker related FFB grading, employment and OHS. - Sterilizer Station. Observation and interviews with sterilizer operator related employment aspect, OHS aspect and working procedures specified. - Press, Kernel, Clarification Stations. Observation and interviews with operator Press regarding employment aspect, OHS aspect and working procedures specified. - Power House Station. Observation and interviews with power house station operator regarding employment

- aspect, OHS aspect and working procedures specified.
- **Boiler Station.** Observation and interviews with Boiler operator regarding employment aspect, OHS aspect and working procedures specified.
- **Sparepart store.** Observation for material handling and OHS
- **Lubricant Store:** Observation for material handling, OHS, and hazardous material handling
- **Chemical store.** Observation for material handling, OHS, and hazardous material handling
- **Workshop.** Observation for OHS and workers welfare
- **Temporary hazardous waste store.** Observation for OHS, material handling, and hazardous waste management
- **Hydrants no 04 and 05.** Observation about emergency preparedness.
- **General Store.** Observation for material handling and OHS.
- **Fuel and Diesel Tank.** Observation for material handling and OHS
- **WTP.** Observations and interviews related to water management, recording of water use, health checks, PPE and waste management.
- **WWTP.** Field observations related to Ban to entry to WWTP, run off, testing of effluent. Officers equipped with PPE and Recording of effluent debit effluent.
- **Domestic WWTP.** Observation management domestic waste and condition of water trap.
- **Solid Waste.** Observation of the management of Solid waste consist of EFB, fiber and shell from the production process of mill.

GUNUNG ARU ESTATE

- **Land demarcation and HGU Poles No. BPN 01, 02 and 04 .** Observation of land demarcation and maintenance of HGU poles.
- **EFB Application Block J2 Division 1.** Observation on safe working practices, OHS and worker welfare.
- **Land Fill Block M9/10 Division 1.** Observation about waste management
- **Enclave area Block L13 Division 2.** Observation about enclave area.
- **Block P1.** Observation the implementation of management of HCV area in Bekampit Hulu River.
- **Replanting Area Block J2 Division 2** observation related replanting area that conducted on 2018
- **Block J2 Division 2 FFB Transportation.** observation related FFB transporting and OHS
- **Land application Field A08** Observation about flat bed condition, indications of spillage or overflow of liquid waste, and interviews with workers related to tasks, responsibilities and aspects of employment.
- **Barn Owl Box, Block L10 Division 2.** Observation of biological treatment of rat's infestation by installing and monitoring barn owl boxes.
- **Clinic Central.** Interview with company doctor related to working accident and also observe medical waste/hazardous waste management.
- **Chemical weeding, block O-34 Division 1.** Observations and interviews with pesticide applicator regarding to safety working procedure of pesticide application, PPE usage, reproduction right, salary, complaint mechanism etc.
- **Fertilizing, block N9 Field AO028 Division 2.** Observation on safe working practices and interview with the manuring workers related type of fertilizer use according to the procedure and also worker welfare.
- **Block Spraying System (BSS) House.** Observation and interview related conditions of chemical mixing area, PPE store and PPE handling.
- **Housing complex division II.** Observation of the availability of infrastructure such as employee housing facilities, water facilities, educational facilities, religious facilities, health facilities and sports facilities
- **Diesel and fuel tank.** Observation for OHS and material handling.
- **Pesticide Store.** Observation and interviews related to chemical and pesticide storage area, hazardous waste management, and OHS.
- **Workshop.** Observation for OHS and workers welfare
- **Fertilizer Store.** Observation for material handling, OHS, and hazardous material handling
- **Lubricant Store:** Observation for material handling, OHS, and hazardous material handling
- **General Store.** Observation for material handling and OHS.
- **Fuel and Diesel Tank.** Observation for material handling and OHS

- **Lubricant Store:** Observation for material handling, OHS, and hazardous material handling

GUNUNG KEMASAN ESTATE

- **FFB Harvesting, Block B11.** Observation and interview to the workers related FFB quality, employment, and OHS.
- **Spraying Circle and Path, Block B31.** Observation and interviews to the workers related best practices, environmental, employment, and OHS.
- **Fertilization, Block B09.** Observation and interview to the workers related to best practices, environmental, employment, and OHS.
- **EFB Mulching Application, Block B18.** Observation and interview to the workers related land conservation on replanting area by EFB mulching, as well as employment and OHS.
- **Replanting of 2017 (planting year 2018) on undulating area, Block B18.** Observation on replanting area, zero burning, soil and water conservation on undulating area.
- **HCV Area Bekambit river buffer zone Field B003 Division 1** Observations on marking of HCV management, monitoring of RTE species, etc.
- **HCV Area Sejaka River buffer zone Field B041 Division 3** Observations on marking of HCV management, monitoring of RTE species, etc.
- **Landfill field B026 Division 1** Observation related to domestic waste management.
- **Land Demarcation and HGU Poles No 9,10,11** Observation on aspect of land demarcation and maintenance of HGU poles.
- **Hazardous waste store** Observation for OHS, material handling, and hazardous waste management
- **Pesticide store** Observation for material handling, OHS, and hazardous material handling
- **Central store** Observation for material handling, PPE Stock and OHS
- **Fertilizer store** Observation for material handling, OHS, and hazardous material handling
- **BSS** Observation and interviews related to washing of working tools, PPE spray teams and used pesticide containers handling.
- **Central Housing Complex** Observation of employee facilities, management of domestic waste, emergency response facilities, provision of clean water.

LAUT TIMUR ESTATE

- **Generator Set.** Observation on OHS and hazardous waste management.
- **Housing Complex of Division 3** Observation and interview with residents about housing facilities, , domestic waste management, water reservoir, and complaint mechanism.
- **Daycare.** Observation and interview related daycare facility.
- **Land demarcation and HGU Poles No. BPN 04, 13 and 14** Observation of land demarcation and maintenance of HGU poles.
- **Replanting Area H21, Division 2** observation related replanting area that conducted on 2019
- **Fertilizer Store.** Observation for material handling, OHS, and hazardous material handling
- **Hilly Area, Block Z16.** Observation of soil and water conservation on hilly area, bay making contour terrace.
- **HCV area Sekajah river buffer zone Field C020 Division 2** Observations on marking of HCV management, monitoring of RTE species, etc.
- **HCV area Lawe river buffer zone Field C023 Division 2** Observations on marking of HCV management, monitoring of RTE species, etc.
- **Replanting Area Field C025** Observation about replanting area,
- **Pesticide Store** Observation for material handling, OHS, and hazardous material handling
- **Fertilizer Store** Observation for material handling, OHS, and hazardous material handling
- **Central Store** Observation for material handling, PPE Stock and OHS
- **Generator House** Observation and interviews related to work procedures, OHS implementation, employment and complaint mechanism.
- **Oil Store** Observation for material handling, OHS, and hazardous material handling
- **BSS** Observation and interviews related to washing of working tools, PPE spray teams and used pesticide containers handling.
- **Workshop** Observation for OHS and workers welfare
- **Fuel Tank** Observation for OHS and material handling

- **Chemical weeding, block X-16/17 Division 2.** Observations and interviews with pesticide applicator regarding to safety working procedure of pesticide application, PPE usage, reproduction right, salary, complaint mechanism etc.
- **Fertilizing, block BB19 Field CO024 Division 2.** Observation on safe working practices and interview with the manuring workers related type of fertilizer use according to the procedure and also worker welfare.
- **EFB application by the contractor, block Y26 Field C028 Division 3.** Observation of EFB application activities in the immature area as nutrient enhancers and interviews with contractor workers regarding procedures, aspects of OSH and social security.
- **Barn Owl Box, Block C26, Division 2.** Observation of rat control by using biological predator.
- **Harvesting, Block C30/29 Field CO040 Division 3.** Observations and interviews with harvesters regarding wages, harvesting procedures and OSH implementation.

PANTAI TIMUR ESTATE

- **Housing Complex of Division 1 Pantai Timur Estate.** Observation and interview with residents about housing facilities, , domestic waste management, water reservoir, and complaint mechanism.
- **Block Spraying System Facility.** Observation of Body shower of spraying team and mixing area, spraying tools and PPE storage.
- **Daycare.** Observation and interview related daycare facility.
- **Land demarcation and HGU Poles No. BPN 11, 12 and 13 and supporting pole No 39, 45, 47 and 57 .** Observation of land demarcation and maintenance of HGU poles.
- **Replanting Area Field D005, Division 2** observation related replanting area that conducted on 2019
- **HCV Area Api-api buffer zone Field D014 Division 1.** Observations on marking of HCV management, monitoring of RTE species, etc.
- **HCV Area Gunung Kancil Field D013 Division 1.** Observations of HCV management, monitoring of RTE species, etc.
- **HCV Area Batak buffer zone field D031 Division 2.** Observations on marking of HCV management, monitoring of RTE species, etc.
- **Landfill, Field D013 Division 1.** Observation related to domestic waste management.
- **Chemical Store.** Observation for material handling, OHS, and hazardous material handling
- **Fertilizer Store.** Observation for material handling, OHS, and hazardous material handling
- **Central Store.** Observation for material handling, PPE Stock and OHS
- **Oil Store.** Observation for material handling, OHS, and hazardous material handling
- **Fire Extinguisher Store.** Observation for OHS and material handling
- **Generator House.** Observation and interviews related to work procedures, OHS implementation, employment and complaint mechanism.
- **Workshop.** Observation for OHS and workers welfare
- **Fuel Tank** Observation for OHS and material handling
- **Fertilizing, block DD41 Field DO002 Division 2.** Observation on safe working practices and interview with the manuring workers related type of fertilizer use according to the procedure and also worker welfare.
- **Nursery.** Observation and interview with supervisor regarding to planting material preparation, pesticide and ex pesticide container management.
- **Chemical weeding, block DD35 Division 2.** Observations and interviews with pesticide applicator regarding to safety working procedure of pesticide application, PPE usage, reproduction right, salary, complaint mechanism etc.
- **Manual weeding, block Z38 Division 1.** Observations and interviews with worker regarding to safety working procedure, PPE usage, reproduction right, salary, complaint mechanism etc.

Stakeholder Consulted

- Local Contractor for Infrastructure (CV. Dedy Setia Kawan)
- Local Contractor for Transport Kernel (PT . Cindra Kasih)
- Independent Workers Union Gunung Aru Estate
- Employee cooperative Gunung Kemas Estate
- Independent Workers Union Pantai Timur Estate
- Gender Committee Officials of Gunung Aru Estate and Laut Timur Estate

	<ul style="list-style-type: none"> - Sub District Head of Pulau Laut Timur - Village Head of Sejahkah - Cooperative Officials of KUD Bersama Sejahkah Makmur (scheme smallholder) - Previous Land Owner on Sejahkah Village - Walhi – no response - WWF – no response - AMAN – no response - Sawit Watch – no response
2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ASA 1.3	<p>Summary of stakeholder consultation process</p> <p>Consultation of stakeholders for PT Bersama Sejahtera Sakti was held by:</p> <ul style="list-style-type: none"> • Public Notification on website www.mutucertification.com on 3 May 2019 • Public consultation meeting with government institution on 21 May 2019 • Public consultation meeting with communities including previous land owner 22 May 2019 • Public consultation meeting with internal stakeholders and contractor 24 May 2019 • Public consultation to NGO by Email (WWF, AMAN, WALHI, Sawit Watch) on 13 May 2019 <p>Numbers of input from stakeholders were clarified by PT Bersama Sejahtera Sakti as a part of this report</p>
2.3.2	Stakeholder contacted
	<i>Please find appendix 1</i>
2.4	Determining Next Assessment
	The next visit (ASA 1.4) will be determined eight (8) month to twelve (12) month after date of annual license

3.0 ASSESSMENT FINDINGS
3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Gunung Aru POM – PT Bersama Sejahtera Sakti subsidiary of Sime Darby Plantation Bhd operation consisting of *one (1)* mill and *four (4)* oil palm estates.

During the assessment, there were fourteen (13) Nonconformities were assigned against Major Compliance Indicators; one (1) nonconformities were assigned against Minor Compliance Indicators; and six (6) opportunities for improvement were identified.

Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5. The company has already prepared and implemented the corrective actions that had been reviewed and accepted by Auditor(s) in form of documentation evidences e.g. *document record and photographic documentation*.

MUTUAGUNG LESTARI found that Gunung Aru POM – PT Bersama Sejahtera Sakti – SIME DARBY Plantation complied with the requirements of Indonesian National Interpretation of RSPO Principles and Criteria 2013 by INA-NITF (Indonesian National Interpretation Task Force) July 2016, endorsed by the RSPO Board of Governor 30th September 2016 and RSPO Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 14 July 2017 (Module E for CPO Mill).

Therefore MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is **Continued**

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
PRINCIPLE #1 COMMITMENT TO TRANSPARENCY		
1.1	Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	
1.1.1, 1.1.2	Based on consultation with stakeholders (Village Officials, local contractors, labor union, plasma cooperative) known that they already known the mechanism and documents that accessible in accordance with interest, by submitting the letter of request. The CH has maintain the request of information and its response, as well as evidences of mandatory report to government agencies. Based on interview with stakeholder and logbook of incoming letter, the frequent letter from stakeholder were in kind of request of fund or heavy vehicle. For instance the request of heavy vehicle from Village of Bekambit Asri dated 7 April 2019, has been responded of approval by CH on 8 April 2019, and the realization will be held on 12 April 2019.	
	Status: Comply	
1.2	Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.	
1.2.1	The CH has a list of information that can be accessed by the relevant public, documents that are publicly available are written in document control procedures No. 301/BSS-DOC-01/11 policies, such as AMDAL documents, RKL/RPL documents, HCV, statement of areas, policies, OHS, etc. All public documents are placed in the PSD office while operational related documents are placed in each unit, both Estate and Mill.	
	The CH has socialized the SOP to all stakeholders through formal and informal ways. The PIC responsible for socialization is the PSD officer and the administration head in each unit. PSD officers are also responsible for updating	

information / documents. in the Document Control Procedure No. Policy: 301/BSS-DOC-01/11 confidential documents are explained.

Status: Comply

1.3

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

1.3.1

The CH has a Business Ethics Policy No. 440/HRM-COC/07 dated 24 May 2007. The CH developed business ethics by considering the expectations of stakeholders and the application of a code of ethics including monitoring, reporting and sanctions for violations of the code of ethics. Commitment to interaction with stakeholders is the company's top priority and becomes part of the company's business ethics and creates added value, stakeholders and expectations that are explained in detail. In addition, the CH also has a work code of ethics that regulates the basic behavior of individuals and their attitudes and skills within and outside the company.

From the results of interviews with workers, it is known that they know and understand about company policies to respect human rights and commitment to ethical behavior in all work operations. In addition, from the results of interviews with contractors it was known that the policy had been socialized when the contract was made.

Status: Comply

PRINCIPLE #2 COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS

2.1

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

2.1.1

The CH shown evidences over its compliance toward the applicable regulation related to the aspects of land legality, employment, OHS, environment, good agricultural practices and good manufacturing practices. For example there were evidences of compliance toward the valid of HGU and IUP, and Mill's stations certificates that were routinely inspected by the relevant agency, compliance toward the environment regulation such as POME land application permit, hazardous waste temporary warehouse permit, and report of environmental management and monitoring plan, and compliance toward employment such as minimum payment in according Governor Regulation.

2.1.2 and 2.1.3

The CH has a mechanism to assess compliance with the law and regulation, in accordance with the SOP of Guidance of Sustainable Plantation (No.724/TQEM-SPMS/09) stated related regulation compliance by annual internal audit of regulation compliance. Starting with inventorying and make a list of the rules applicable in regional, national, and international. The list updated semester by Sustainability Officers the relevant department in accordance with the procedure. CH have list of regulation of 2019 related to the field of employment, environment, HCV, OHS, and legality of land use (audit of 18-19 March 2019). Those list were include of regional, national, and ratified international regulations.

2.1.4

The latest regulations related oil palm plantation has been identified, for instance Decree of South Kalimantan Governor No. 188 of 2018 related minimum wage of 2019, Decree of Agrarian Minister No. 14 of 2018 related location permit. However the CH has opportunity for improvement related there were several latest regulation that has not been updated. **OFI**

Status: Comply

2.2

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

2.2.1

The company showing legal permits of land ownership from Government as below:

1. HGU Certificate No. 01, dated 3 January 1995. Cover area: **8,222.54 Ha**. Valid until 31 December 2022.

2. HGU Certificate No. 36, dated 14 May 2002. Cover area: **3,318 Ha**. Valid until 24 September 2037.
3. HGU Certificate No. 42, dated 25 June 2004. Cover area: **100 Ha**. Valid until 20 April 2039.
4. HGU Certificate No. 62, dated 31 December 2004. Cover area: **1,100 Ha**. Valid until 10 December 2039.
5. Decree of Regent Kotabaru No: 188.45/389/KUM, dated 15 October 2009. Approval on Re-enrollment of Plantation Permits (IUP) PT. Bersama Sejahtera Sakti with cover area 12,740.54 Ha and Mill capacity 60 MT FFB/Hour.

Total land use rights (HGU) area is **12,740.54 Ha**. Whereas, in the Area Statement Minamas Management Committee Meeting (MMCM) document period May 2019 total managed area is **13,776.25 Ha**. There were discrepancy area 1,035.71 Ha that have not legally of land use rights. The areal that have not legally of land use rights on this assessment are excluded from the scope of the certification and planned in 2020.

2.2.2

Legal boundaries of land use right are available in place. In 2007, National Land Agency (BPN) of South Kalimantan Province conducted re-demarcated of boundaries and issued the GPS coordinates list of poles location namely "*Peta Tata Letak Pemasangan Patok HGU PT. Bersama Sejahtera Sakti*". The company has procedure of Maintenance Boundaries Pole namely SOP *Pemeliharaan Patok HGU* (069/BSS-HGU/2010). In the procedure mentioned the monitoring of boundaries pole conducted minimum one time a year. The last monitoring already delivered on August 2018 in LTE, September 2019 in PTE, April 2019 in GAE and January 2019 in GKE with the results of monitoring its known if all boundaries poles are good and maintained. Based on field observation by auditor team, checking the sampled boundary poles using GPS tool GARMIN 62s, on Boundaries Pole in GAE **No. BPN 01, 02 and 04; GKE No 9,10 and 11; LTE No 04, 13 and 14; PTE No 11, 12 and 13 and supporting pole No 39, 45, 47 and 57** all the legal boundaries are well demarcated, visibly maintained and appropriate with coordinates

2.2.3; 2.2.4; 2.2.5; 2.2.6

Based interview with Sub District Head of Pulau Laut Timur, Village Head of Sejakah, Cooperative Officials of KUD Bersama Sejakah Makmur (scheme smallholder) and Previous Land Owner on Sejakah Village as well as field observations are known that there is no land disputes on Certificate Holder's operational area. Therefore based on interview also obtained information that the certificate holders have fair compensation through FPIC with the previous land owners/occupation area.

Therefore regarding to land conflict with PT Inhutani II (1,100 Ha) has been finished by legal recourse. There are lawyer letter (Yudha Dewi Setiawan Sihombing Law Firm) No. 068/YDSS-2.05/VIII-18 dated 23 August 2018. It was explain that PT BSS is holder of legal right (HGU) No. 36, while the PT Inhutani II committed acts against the law.

Status: Comply

2.3

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

2.3.1

In order to conflict resolution, the company using "SOP Penyelesaian Konflik (054/BSS-SOP)" dated 8 May 2015, which is the process for resolution available in flow chart. FPIC process is described in the procedure. During stakeholder consultation with external stakeholder (Sub District Head of Pulau Laut Timur, Village Head of Sejakah, Cooperative Officials of KUD Bersama Sejakah Makmur (scheme smallholder) and Previous Land Owner on Sejakah Village) stated there is no customary right within the plantation area. However, based on field verification at **L13 Division 2 Gunung Aru Estate**, The auditor has been verified about the presence of other party that used the land inside the operational area of PT BSS. The area has been planted with rubber and oil palm crops. The company classified this area as an enclave and presence in estate map with appropriate scale. Also, the company has identified the land ownership of its area.

2.3.2; 2.3.3

The presence of occupied land within the plantation area classified as an enclave and there is no negotiated agreement, because the land ownership is not release the land to the company. Both parties, company and occupiers are acceding

to maintain and not disrupt each other. This condition is communicated in Bahasa and appropriate forms. If necessary to giving additional information, the company will contact the representative of the community through head of villages.

Status: Comply

PRINCIPLE #3 Commitment to long-term economic and financial viability
3.1

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

3.1.1

The CH has a 2018-2023 Management Plan of Mill which includes projections for FFB production, projections for CPO production, production costs, Oil Extract Rate (OER) extraction projections, kernel extraction and cost projections for each factory activity such as Fruit Handling, Sterilization, Threshing, Pressing, Clarification, Depericarping, kernel recovery station, boiler station, power generation, production storage and despatch, laboratory, water treatment plant, effluent treatment, workshop and maintenance, and EFB disposal.

As for all Estate, has Management Plan for 2018-2023 contains projections of the statement area for the Mature Palm Oil Area, Immature and Replanting and the projection of the new planting. In addition, there are also projection documents for other areas such as projections of housing positions, roads, security trenches, protected areas, HCV areas, use / supply of seeds, road and bridge construction, estimated transportation costs, estimated plant maintenance costs, estimated plant costs produce and projection of harvesting costs. Based on Semi Detil Soil Survey, there is no peat area.

3.1.2

Related replanting program, there was Budget and Long Range Replanting Documents (period of 2009-2027). The replanting program includes the Gunung Kemas Estate, Pantai Timur Estate and the Laut Timur Estate. The CH has a Minamas Management Committee Meeting document in December 2018 which evaluating the longterm and replanting plan.

Status: Comply

PRINCIPLE #4 Use of appropriate best practices by growers and millers
4.1

Operating procedures are appropriately documented and consistently implemented and monitored.

4.1.1

The CH has had SOP Reference Manual of Agronomy of Oil Palm Plantation. Policy 110/EST-ARM/13 on the technical culture of oil palm cultivation is released based on the Head Plantation Upstream Indonesia memorandum on September 01, 2013. The SOP covers plant material, nursery techniques, replanting, tillage, field maintenance, fertilization, canopy management, water management of coastal areas and plantations on peat lands, ablation, standard of maturity, harvesting, cultivation of loss fruit, legume cover crop, weed control and rainfall recordings.

The CH also has had procedures for mills No. Policy 120/POD-FAC/07 describes power generation systems such as boilers, power plant engines, types of generating machines, synchronization, operation and maintenance of electrical panels, supply networks, electric motors and control circuits, speed reducers (speed reduction), grounding and lightning protection as well as work safety and security.

SOP is available on audit site and stations, written in a language that is easily understandable for workers and relevant with company situation.

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

4.1.2

Certificate holder has had several methods to monitor the implementation of procedures. Among others conducted regularly Internal Audit of RSPO, Internal Audit of Operational/Financial, Internal Audit of PSQM for Mill and Estate,

Financial Audit by Public Accountant, as well as Plantation and Mill Advisory Visit. Furthermore, the management representative (Assistant, Manager, and related Superiors) routinely conduct inspectorate visit and regular document review to control the implementation of the procedures for internal operation, as well as contractor operations, such as the minimum wage, worker insurance, minimum age, and PPE utilization.

4.1.3

Based on documentation and interview with the management, the mechanism carried by internal audits and management review on Minamas Managemen Committee Meeting (MMCM). Meanwhile the internal audit consists of :

- Financial internal audit – conducted incidentally
- Performance Monitoring Unit Visit – twice in a year
- PSQM audit – twice in a year

Those management review and internal audits records well maintained in the unit, for instance Performance Monitoring Unit Visit Summary Report of Gunung Aru Estate and Pulau Laut Estate on 9-10 May 2019. Covered activities of area statement, immature, manuring, mature upkeep, building and facility, and cost.

4.1.4

Based on observation on FFB receiving in security and weighbridge station known that GAF received FFB from certified plantation namely GAE, GKE, LTE and PTE. Furthermore the CH since October 2018 Gunung Aru Mill Received FFB from smallholders and third party supplier.

Status: Comply	
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4.2

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

4.2.1, 4.2.2, 4.2.3, 4.2.4

The CH already has a Reference SOP for the Oil Palm Planting Manual No. Policy 110/EST-ARM/13 consisting of 18 chapters / sections on technical culture of oil palm cultivation released based on Head Plantation Upstream Indonesia's memorandum on 1 September 2013, there are guidelines for managing soil fertility. Implementation of manuring activity has been well documented. It available in each estate and shown compare budget or recommendation against realization. Based on document review, it shows that the manuring activity (time, location, dose, amount) has been in accordance with the recommendation. The anorganic fertilizer on 2018 and 2019 were NK Blend, HGFB, and CCM 44.

During the audit, the implementation has been verified through review of records and field observations, such as controlled fertilization based on SSU (every 5 year) and LSU (annually), maintenance of cover crops, EFB mulching applications, POME land application, selective weeding, making terrace on slope area, etc. On replanting area in all Estate, the CH chopped palm oil stalks to accelerate decomposition.

Status: Comply	
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4.3

Practices minimize and control erosion and degradation of soils.

4.3.1, 4.3.4, 4.3.5, 4.3.6

Based on the Semi Detil Soil Survei of PT Bersama Sejahtera Sakti, it is known that the CH has carried out topographic mapping activities. Based on the map, the operational area consists of a flat topography (level) of 14.10%, undulating (undulating) of 21.01%, corrugated (rolling) of 57.35%, hilly of 6.40%, slightly steep of 0.76%, and steep (0.38%). The limitation factors are topography and soil fertility. Based on semi detail was not identified peat area, or others fragile/marginal soil.

4.3.2

The strategy to maintain slope area shown a Memorandum from the GM Business Planning & Administration, dated 01 July 2014 No 03 / BPA.SP-HPUI / VII / 2014 concerning ARM Chapter 4-Land Preparation which explains that the land in the estate area with steep slopes (> 40% / 21.8°) so that it is not planted and left to maintain biodiversity, but road access between land planted and those not planted must be made and maintained. On SOP of Erosion Stake (No

Dokumen 056/BSS-SOP) state that the CH will installed erosion stakes to measure erosion rates.

Field observation on slope area at Laut Timur Estate Block H21, some implemented strategies such as building individual and contour terrace, planting LCC, selective weeding, frond stacking direct to the terrace, and installing erosion stake.

4.3.3

The CH has had document of road maintenance program and realization. Based on document review and field observation on all Estate, road maintenance has been conducting well, allowing to be used well for operational activities. Road maintenance conducted manually or by heavy equipment such as road grader and vibro compactor, as well as hardening road by gravel and laterite soil.

Status: Comply

4.4

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

4.4.1

The company has a water source identification document and its management is contained in environmental documents, HCV and land application permits. Water sources include the Betung river, Bekambit Atas river, Bekambit Bawah river, Sejakah Atas river, Sejakah Bawah river, Api-API river and Batak river. Companies that have carried out management include: water quality testing (including wastewater / POME) in the semester, monitoring of water use and river border management. Reporting on the management and monitoring of water sources and their evaluation is reported to environmental agencies every semester.

- During ASA-1.2 activities there are nonconformity related to water management, this is related to the land application area in the replanted area. when the ASA 1.3 activity the company makes improvements in the form of:
- Making 1292 new flatbed units, carrying out 441 units of old flatbed washing
- Make schedule liquid waste applications for 2019, and proof of realization from January - March 2019
- Receive three new officers as operators in the Land Application area.

Based on the results of field observations to the Land Application area of field A08 Gunung Aru Estate, no indication of leakage in the Land Application area. NCR.2018.01 Has been closed.

4.4.2

The company has an HCV assessment and river border management procedures. The results of field verification in Sejakah River Field B041 Div III and Bekambir River Field B003 Div I GKE, the management efforts carried out include the installation of HCV warning boards, marking of spraying limits in the form of circular yellow paint on the oil palm and planting of woody trees on the river border.

The company has HCV identification results, river border and protection procedures with a width of 50 m, based on observation to replanting area in filed C025 LTE, known the river border area has been left 50 meters long left and right of the Sejakah River, which remains as the HCV area. In addition, the company provided a trench with a enrichment in an area that was not replanted by planting *Trembesi* and *Sungkai* plants.

4.4.3

Mill has had license for land application in accordance with Decree of Kota Baru Regent No.503/01 / IPAL-BPPTPM / 2016 dated 31 August 2016. The management has tested mill's effluent regularly every month. The result of the test is recorded on implementation report of environmental management and monitoring and reported to Environmental Agency. Test results for August 2018- February 2019. The maximum BOD test results obtained are 893.54 mg/l in January 2019 and the smallest is 365.45 mg/l in September 2018. According to the test result, the quality of effluent is accordance with the quality threshold (Environment Ministry Decree No. 29 Year 2003 and land application license).

4.4.4

Based on interviews with factory management, the use of water for processing FFB was budgeted at 1.5 m³ / MT FFB. Based on water use monitoring data for the period July 2018 to April 2019. Total water used for proces and boiler

consumption is 203008 m³ with a ratio of water use for processing FFB 1.5 m³ / MT FFB.

Status: Comply

4.5

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

4.5.1, 4.5.2

An integrated strategy for pest and disease management has been established in agronomy procedures on pest and disease control, or in other related procedures. The strategies include early warning system (census), the planting of beneficial plants (*Turnera subulata*, *Cassia cobanensis*, and *Antigonon leptosus*), selective weeding to establish soft weeds to suppress leaf eater caterpillar, build and monitoring barn owl boxes to suppress infestation of rats. In addition, on replanting area the oil plam thrunk chipped and put in closed ended conservation trenches (CECT) to suppress oryctes.

Early warning system is conducted in the form of census every three months to monitor the infestation of potential pests and diseases such as leaf eater caterpillar, rats, ganoderma, termites, and oryctes. Appointed census workers have been trained annually.

Based on data and summary of census every Estate on period of January to April 2019, it is known that there are no pest and disease infestation that exceed the economic threshold, except on several block in immature area of Gunung Aru Estate and Laut Timur Estate. Control has been carried out by increasing the installation of pheromone traps.

Field observation verified that visually there is no symptoms of leaf eater caterpillar infestation on the canopy, or the rats infestation on the FFB collected in the FFB platform. The pesticide monitoring for the period of January to April 2019 also shows no usage for pest and disease control, but only for routine weed control in the circle and harvesting path. Furthermore beneficial plants such as *Turnera subulata* and *Antigonons leptosus* have been planted in main and collection road. The barn owl boxes indicates the occupation barn owl.

Status: Comply

4.6

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

4.6.1

The CH has identified recommended pesticides, active ingredients, justified the intended use, and has been registered with the Pesticide Commission, Ministry of Agriculture based on verification on the pestisida.id website. The pesticides used indicate specific targets, and the minimum impact on species outside the target. The application method has been arranged in the SOP of Block Spraying (No. 3/SOP-BSS/BSS-GKE/10 dated 01 April 2010), which aims to guide the use of pesticides that are safe for workers and the environment.

4.6.2

Certificate holder has documentation of pesticide utilization that record product name, active ingredients, LD50, percentage of active ingredients, total application, total active ingredients, hectare application and active ingredients per ton FFB production. For instance for Gunung Aru Estate in period of January to April 2019, the utilization of all pesticides are 0.23 kg of active ingredients per hectare, or 0.02 kg active ingredients per ton of FFB.

4.6.3

In line with the explanation of criterion 4.5 that IPM has been carried out quite effectively, so that there is no chemical use for pest control, but for routine weed control. The pesticides used are also not preventive pesticides. Based on observation of spraying activities, the application method is not a preventive application, but rather selective for locations that have weeds.

4.6.4

The CH has shown a policy to minimize and eliminate the use of paraquat pesticides listed in Memorandum (No. POD-UM-0110/X2008 dated 16 October 2008) regarding recommendations for substituting the active application of Paraquat.

Furthermore there was a policy of reducing the use of class IA and IB pesticides (No. 01/BSS-Pest/VIII/2017 dated 22 August 2017) state that all business units to always evaluate and control the use of IA and IB class pesticides seriously and sustainably, so that finally can be zero use of class IA and IB pesticides. Has been verified based on document review and field observation in chemical warehouse and praying activity, that the CH no longer use paraquat.

The auditors conducted verification of NCR 2018.03 on indicator 4.6.4 Minor, related the CH still conduct procurement of Sime Ebor Bait on 27 February 2018 totaling 1,100 kg with the last stock at the audit visit (August 29, 2018) at 24.81 kg. The CH has not been able to show evidence regarding the plan for reduction and justification regarding the minimization of the use of group 1A and 1B pesticides.

During the audit, the CH shows the justification that the packaging of Sime Ebor Bait TM products with active ingredients of Warfarin is 0.05%, while the remaining 99.95% is a mixing material, indicating the band color (color symbol of packaging) which is light blue which means having WHO III class.

Refer to the WHO Recommended Classification of Pesticides by Hazard and Guidelines to Classification 2009 document, page 4 states that *if the formulation contains more than one ingredient (including solvents, wetting agents, etc) of significant toxicity enhancing properties, then the classification should correspond to the toxicity of the mixed ingredients*. In addition, in the WHO & FAO Guidelines on Good Labeling Practice for Pesticides 2015, on page 51, the encoding in pesticide packaging is explained, including related color bands (color symbols in packaging) which consist of red for classes Ia and Ib, yellow for class II, and blue for class III.

In addition, the CH showed other documentation related to efforts to reduce pesticides for rat control, such as periodic census on rat infestation (indicating controlled levels), and biological control efforts by installing and monitoring barn owl boxes. Based on those explanation, this nonconformity is declared to be comply.

4.6.5, 4.6.7 & 4.6.9

Based on interview with spraying worker in every unit, they have received internal training related handling pesticide and spraying technic annually. The workers can demonstrate safe working practices in accordance with the existing procedures, including prohibition of spraying on river or water bodies, and understanding emergency response in the event of an accident. Pesticide solutions are mixed in pesticide warehouses and transported by special vehicles. Knapsack sprayers are in good condition, personal protective equipment has been used according to MSDS and HIRAC such as boots, apron, rubber gloves, mask, safety goggles. After work, knapsack sprayer and PPE are stored in a special storehouse at the Estate. Foods were brought in a special storage that was protected from pesticides, as well as provided clean water and soap for washing hands. During breaks, workers ate on blocks that have not been applied by pesticides, and removing aprons and other PPE that are exposed.

4.6.6

The company has shown Warehouse Management SOP with No. 6 / SOP-PG / BSS-GKE / 10 dated April 1, 2010 which included storage of toxic and dangerous items such as agrochemicals and fuel stored in a place separate from other goods (so as not to contaminate other goods) and not disrupting human health and does not pollute the environment.

The company has also shown the SOP for Hazardous Waste and Non Hazardous Waste Management which contains procedures for managing used pesticide waste. The company only manages pesticide packaging waste by storing the waste temporarily before being given to licensed collectors.

Based on field observations at Gunung Kemasan Estate and Laut Timur Estate, it was found that all used pesticide containers were washed/rinsed in the available washing places, then recorded by warehouse staff and then sent to temporary hazardous waste warehouse in each estate. Used pesticide packaging is stored and collected at temporary hazardous waste warehouse that are licensed, documented (log book) has been done well. In addition, based on visits to housing, it is known that there are no ex-pesticide containers removed or used for other purposes. The packaging waste is properly stored and recorded. based on observation to Pesticide store in GAE, PTE, and GKE known that pesticide storage is accordance with the best practice.

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 Restu Ibu Kotabaru, dated 15 April 2019.

4.6.10

Company possess procedure for Toxic and Hazardous waste including ex agrochemicals management listed on (050/BSS-SOP, 25 Sep 2013). These procedure stated that all ex chemicals containers were kept on temporary hazardous storage at mill/estates. Training for workers and staff regarding hazardous & toxic material handling have been conducted on 16 March 2019 attended by 37 participant.

Based on observations to the hazardous waste warehouse in GKE and GAP, hazardous waste management has been done in accordance with the procedure owned, carried out logging and entering the waste by the officer. Based on interview with sprayer team found that workers recognized how to properly disposed waste materials and workers have been trained by company about waste and hazardous materials handling.

4.6.11

Based on field observations and interviews with herbicide applicators, for example on the Pantai Timur Estate Division 2, it was found that the number of herbicidal applicators working was 14 people and 1 person was sick. Workers interviewed were 7 female herbicide applicators.

The certificate holder shows an annual medical supervision record for all pesticide operators and employees who work at high risk stations and / or chemical handlers work together with the *Klinik Simpang Batulicin* on October 2018. Following briefly the results of the examination, for example on Gunung Aru Estae, found 1 person Fertilizer with moderate restriction check results. The results of the MCU follow-up 1 worker was declared fit to work. The results of the follow up were no abnormalities in the lungs and physical examination. Technical constraints on checking difficulties during technical inspection. Based on the results of interviews in the field, it was found that there were no complaints by workers regarding health problems such as diarrhea, vomiting, hives, allergies and others.

4.6.12

Based on the results of interviews with fertilizing workers and herbicide applicators in PTE, it was stated that workers had been aware of a policy stating that pregnant and lactating women prohibited pesticides. In addition, they also stated that there is no special mechanism for pregnancy screening, which runs so far if workers feel that their menstruation is inappropriate then they will report to the foreman and the foreman telling them to check into the clinic. The workers explained that if they were pregnant they would immediately report to the company so that they would be transferred to lighter work. Workers also stated that the company gave menstruations leave rights for those who menstruated on the basis of the results of medical examinations at the company's clinic first.

Based on the explanation of PTE spray workers, the evidence that pregnant and lactating women were not allowed to handle pesticides was that there were friends who were mutated due to pregnancy.

The clinic shows the Inter Office Mail from the Central Clinical Midwife to the PTE Manager regarding information about pregnancy and may not be employed in spraying / fertilizing on May 10, 2019.

Status: Comply

4.7

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

4.7.1

The certificate holder has a Health and Safety Policy, signed by Head Plantation Upstream Indonesia. The certificate holder also showed the procedures relating to occupational safety and health, including guidelines OHS, identification and assessment of hazards and risks, how to work safe and provision of PPE. The policy is delivered periodically at the morning briefing or at special times specified by the certificate holder. Based on the results of interviews with workers, both in the estate and at the mill regarding safety policies, workers have understood the essence of the policy. Among them, the workers stated briefly that the implementation of the policy was that workers were required to use PPE

provided by the company for free.

The certificate holder also shows the Occupational Safety and Health Program in 2019 which was an attempt to minimize the Lost Time Accident. Realization of the plan, for example, socialization/ training related to safety and hazardous and toxic material waste to contractors / contractor workers replanting, on February 4, 2019 in Field B040 block V8 / 9, which was attended by 6 participants (5 Excavator operators and 1 supervisor) and periodic health checks on cholinesterase and spirometry conducted on October 2018 at the Klinik Simpang Batulicin.

The certificate holder also monitors the effectiveness of the occupational health and safety plan, for example in relation to the health check. Based on the results of the health examination, briefly explained as follows:

- Gunung Aru Factory has 3 people who received health records from the examiner. The results of the follow up of 3 workers by the company doctors were declared fit to work with the addition of blood boosting supplements.
- Gunung Aru Estate 1 fertilizers who get a note from the examiner. The results of the follow-up of 1 worker were declared fit to work by the company doctor because there were no abnormalities in the lungs and physical examination. The technical constraints of the examination are difficulties during technical examination.

4.7.2

The certificate holder already has a risk assessment document for estates and factory, but based on the results of document verification, it is known that there are several activities in the field that have not been identified as potential hazards and risks, but are not limited to:

- Census activities and pest control
- Activities in the nursery area,
- Observation activities of pole and HCVs,
- Grading & weighing activities
- Security work.

In addition, based on the results of a sample field visit in the estate & factory it is known that there are several Risk Controls that have not been implemented such as :

- Spray workers found in GAE block O34 do not use eye protection
- Loaders found in GAE block J2 do not use the appropriate PPE
- PKWT/ contract workers found in the sorting section in GAF are not provided with PPE
- Contractors found on the Pantai Timur Estate did not use PPE

Based on the explanation above, the company has not been able to show that all activities both in the estate and in the factory have been carried out risk assessment and monitoring of the implementation has not been in accordance with what has been determined. **Based on the explanation, raised the non-conformance NC 2019.01 with major category.**

4.7.3

The unit has a document certification procedures PPE, which clarify some points, including certification unit to provide PPE for employees, PPE only loaned the company to employees and PPE are damaged or depleted of its useful life can be replaced or exchanged regulated reimbursement mechanisms. The results of field observations in estate and mill well as interviews with workers, it is known that the certification unit has provided PPE and have been given training in safe work practices for example socialization/ training related to safety and hazardous and toxic material waste to contractors / contractor workers replanting, on February 4, 2019 in Field B040 block V8 / 9, which was attended by 6 participants (5 Excavator operators and 1 supervisor). Unit certification demonstrates proof handover PPE, for example, on November 11, 2018, there was a worker changed the PPE for damaged helmet. The PPE provided by the company refers to the product label / MSDS or risk assessment, for example for herbicide applicators have been equipped with PPE in the form of eyeglasses, mask, apron, rubber gloves and boots in accordance with the results of risk analysis and product label/ MSDS.

4.7.4

The certificate holder has Guiding Committee for Occupational Health And Safety Organization and personnel in charge on implementing the occupational health and safety program. Guiding Committee of Occupational Safety & Health

Board has drafted an OHS working program and evaluates the implementation of OHS program in the field. In order to ensure that the OHS program has been implemented effectively, the board of Guiding Committee of Occupational Safety & Health performs a monthly meeting with workers. The guiding committee for occupational health and safety report covers the entire occupational health and safety activity within company's operation activity.

4.7.5

Unit certification has procedures in case of accidents and emergencies along with instructions, such as procedures regarding Occupational Health and Safety (711/TQEMS-P2K3/07), accident reporting SOP that referred to PSQM No. memorandum 008 / PSQM-UM / IX / 2013 and Emergency response SOP No. 033 / BSS-SOP / 10 dated April 1, 2010. Based on the results of field observations, it was found that the certificate holder had installed clear instructions on emergency procedures that were easily understood by all workers such as at BSS house there was a *Langkah Keselamatan Penggunaan Agrochemical* Procedure. In addition, based on the results of field observations in mill and office, there are evacuation routes in mill and office.

Results of verification of non-conformity No. 2018.05 on April 26, 2019, the company has sent proof of improvement in the form of proof of socialization of the First Aid Box and OHS SOP in the work environment. This socialization was held on August 30, 2018 and was attended by 7 traction employees (mechanics, welders, drivers, clerk and safety officers). Also available is a checklist check box contents first aid box by the safety officer and the addition of the contents of the box in accordance with existing standards.

The Auditor's conclusion on 26 April 2019, based on the evidence of corrections that had been shown, this discrepancy was declared close with observation.

Based on interviews with workers and foremen and verification of documents, known to the company has organized First Aid training, such as in the sport arena Gunung Aru Estate on November 2, 2018 led by a company doctor and attended by 64 participants. Equipment for first aid has been provided in the workplace. Based on the results of field observations in operational activities in the field, such as harvesting, spraying, at nursery offices and in mill, it is known that first aid facilities have been provided by the company in as many as 21 items.

The certificate holder has the opportunity to complete a warehouse with OHS information. **OFI**

4.7.6

The certificate holder shows evidence that the worker gets medical services and is protected by accident insurance, for example, shown as follows:

- Proof of payment for LTE *BPJS Ketenagakerjaan* for the period of April 2019 on May 7, 2019 for 328 workers guaranteed by *Jaminan Kecelakaan Kerja, Jaminan Hari Tua, Jaminan Kematian* and *Jaminan Pensiun*. Also shown is data on the number of participants and information on adding or reducing workers.
- Proof of payment of GKE *BPJS Ketenagakerjaan* for the period of March 2019 on April 5, 2019 for 411 workers guaranteed by *Jaminan Kecelakaan Kerja, Jaminan Hari Tua, Jaminan Kematian* and *Jaminan Pensiun*. Also shown is data on the number of participants and information on adding or reducing workers.

The certificate holder shows work accident claims. For example, a Preliminary Work Accident Report dated January 15, 2019 Laut Timur Estate workers for maintenance employees to proof of accident claims. The claim process has been completed during the audit activity.

Regarding the minor category NC.2018.06, the certificate holder shows proof of improvement in the form of an Empty Fruit Bunch Application Work Agreement sample number LTE / SPK-INTERN / III / 2019/036-JJK dated March 25, 2019 in which there is a clause "the second party must include workers in Social Security".

However, based on the results of interviews with contractors and contractor workers in the field, information was obtained as follows:

- Based on the results of interviews with PT Cindra Kasih, information was obtained that for PT Cindra Kasih workers 8 out of 23 workers had not been registered with the *BPJS Ketenagakerjaan* program
- Based on the results of interviews with Empty Fruit Bunch application contractor workers in LTE (contractor on

behalf of M. Hizbulloh / Koperasi Sejahtera Makmur), it is known that the worker has worked for 2 months but has not been registered in the *BPJS Ketenagakerjaan* program.

Besides the results of document review and interviews with the company, there is no evidence that all Contractor employees working with PT BSS have been included in the BPJS Employment program. **Based on the explanation, raised the non conformance NC 2018.06 with minor category raised to major category.**

4.7.7

The certificate holder shows work accident records using the LTA metric (lost time accident) stated in the Work Accident Recapitulation document of PT. Bersama Sejahtera Sakti July 2018 – April 2019 which explains the number of cases per month per unit of management, number of days lost, number of jobs, FR and SR. For example for GKE units it is known that there were 17 incidents of accidents and 27 days were lost.

4.7.2	Status: Non conformance NC.2019.01 with major category
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4.7.6	Status: Non conformance NC.2018.06 with minor category raised to major category
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4.8

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

4.8.1 & 4.8.2

The certificate holder has compiled a program and documented the training realization activities covering all aspects of the RSPO P & C, including :

- Technical training on the application of herbicide applications on March 19, 2019 at the block O3 Field A008 at Gunung Aru Estate, which was attended by 17 herbicide applicators. The training discussed about targets, application methods, application quality, calibration and dissemination of HCV.
- Socialization/ training related to safety and hazardous and toxic material waste to contractors / contractor workers replanting, on February 4, 2019 in Field B040 block V8 / 9 Gunung Kemas Estate, which was attended by 6 participants (5 Excavator operators and 1 supervisor)
- Technical training for nettle caterpillar pest control on July 20, 2018 in Field C029 Division 3 of Laut Timur Estate, which was attended by 16 participants. The training discussed about census methods and pest control.

Based on the results of interviews with herbicide applicants on the Pantai Timur Estate and fertilizers on Gunung Aru Estate, it is known that workers can explain the work procedures set by the company, including the prohibition on applying chemicals in the river border area.

Status: Comply

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

5.1

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

5.1.1

The company has one environmental document and document review of Replanting effect:

- 1) Analysis of environmental and social impacts (AMDAL) document with a plantation area of 14,000 ha and factory capacity of 60 tFFB / hour. The scope of AMDAL studies includes: Construction of physical facilities and supporting facilities; Construction of oil palm plantations; Palm Oil Processing Process (Factory)
- 2) Review of the Summary of the Effect of Replanting Activities on Environmental and Social Aspects in 2012.

5.1.2

The company has environmental management documents contained in environmental documents, as well as its implementation reports in the RKL / RPL implementation document per semester. In the report on the implementation of the RKL / RPL Semester II 2018, companies carrying out environmental management include: (1) Management of Air Quality and Noise; (2) Management of Soil and Water Conservation; (3) Management of the quality of liquid waste/POME and factory solid waste; (4) Management of Land Fire Potential; (5) Management of Flora and Fauna; and

(6) Community Unrest Management. based on the results of document review, field visits and interviews with employees or the community, it is known that the environmental management plan has been carried out by the company. however the reporting and documentation have not been carried out in accordance with the directives of KepmenLH 45 of 2005. it has become NCR in the indicator 5.1.3.

5.1.3

The company has environmental monitoring documents contained in environmental documents, as well as implementation reports in the RKL / RPL implementation document per semester. The company conducts environmental monitoring with reference to the matrix contained in the AMDAL document. In the RKL // RPL implementation document every semester, an evaluation of parameters that do not match the environmental threshold value is carried out.

CH shows a report on the implementation of Semester II *RKL-RPL* (July - December) in 2018 and proof of delivery of reports to the Environmental Office of Kota Baru District, Office of Environment of South Kalimantan Province and Ministry of Environment and Forestry through (SIMPEL) on 30 January 2019. The company has not shown evidence that it has carried out all environmental monitoring parameters in accordance with the monitoring matrix contained in the AMDAL document such as:

- There are no discussions regarding erosion management and monitoring
- There is no management and monitoring regarding changes in habitat for aquatic biota (plankton and benthos)
- There are still surface water quality test parameters that exceed the quality standards that have not been evaluated For example: BOD and COD in the Upper-Lower Betung River, Sekajah River and Bekambit River.
- There is no available attachment for monitoring the presence of flora and fauna as proof of management and monitoring the impact of disturbed flora and fauna carried out every six months.
- Not yet attached the proof of interview and questionnaire as a form of management and monitor the impact of community unrest that is carried out every six months.

Referring to the explanation above, the company has not been able to show a complete document on the implementation of the environmental management and monitoring plan in accordance with the guidelines for preparing the RKL / RPL implementation report (KepMenLH No. 45 of 2005). **Based on the explanation, raised the non-conformance NC 2019.02 with major category.**

5.1.3

Status: Non conformity 2019.02 With Major Category

5.2

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

5.2.1

The company has a November 2010 HCV identification document with the scope of the plantation area carried out by a team that has competence in the field of ecology (flora and fauna), social and mapping. The total HCV area is 571.12 Ha covering the river border and hilly area. as for the details conservation area: 78.16 Ha; River: 135.27 Ha; Riparian Zone (Planted area): 357.69 Ha.

According to the HCV document, the following species were identified in the company area:

- Flora: 34 types of unprotected flora,
- Fauna: Identified 23 species of birds and 13 species including those included in the IUCN Redlist Data Book; 2 species protected by law No. 7 of 1999 and Appendix II CITES, namely elang alap-alap nipon (*Accipiter guleris*) and raja udang meninting (*Alcedo meninting*).
- 4 species of mammals were identified, 3 species included in the IUCN Data Book Redlist namely: coconut squirrels (*Callosciurus notatus*), ground squirrels (*Tupaia tana*), kubung (*Cynophalus variegata*); and 1 species protected by Law No. 7/1999 that is the kubung (*Cynophalus variegata*)
- Identified 1 primate species protected by Law No. 7/1999 namely long-tailed monkeys (*Macaca fascicularis*)
- One species of 1 reptile identified is lizard (*Varanus salvator*).

5.2.2

To provide protection against RTE species, management unit has made the hunting ban signboard, patrolling, doing rehabilitation of riparian as habitat and report to relevant agencies (Nature Conservation Agency) if there is a protected flora and fauna. Company also conducted a periodically monitoring every three month for HCV areas, species monitoring, and wild hunting by HCV officer.

Based on field Observation at the river border, such as Sejakah river field B041 and Bekambit River field B003 in GKE, it is known that company has conducted river riparian management, such as:

- Around the watersources is covered with natural plant (*Trembesi & Sungkai*)
- There is a boundary that shows high conservation value areas
- There is signboard of forbidden to hunt.
- Protecting riparian from chemicals contamination. The company has installed sign as prohibiting application of pesticides and fertilizers. The signs can be red painting in palm-stem or sign board. Based on interviews with spraying workers in Block B31 GKE and Block DD5 PTE workers are aware of this.
- Surface water monitoring every semester, by accredited laboratory. Based on the last tests on Semester 2 year of 2018 in upstream and downstream all test parameters are in accordance with the quality threshold.

Based on a review of the document on the realization of HCV utilization and management it is known that the company has been running management and monitoring in accordance with the SOPs and management plans that are owned.

5.2.3

The company has a policy to protect RTE species and has conducted socialization activities for the protection of RTE types, including:

- 1) Tanjung Pengharapan villagers on January 2, 2019, with 30 Participants
- 2) Company employees on February 10, 2019. With 81 Participants
- 3) Installation of a ban on hunting of *Raja Udang* species on GAE: (Block A013; 014; 037; 039); GKE: (Block B047; B041); LTE: (Block C005; 007; 041); and PTE: (block D019; 020; 022; 045; 039)

According to interviews with harvesters and local communities in the Sub District Pulau Laut Timur and Sejakah Village, it is known that they know protected animals, through socialization and signboards available on plantations. According to interviews with local residents and field observations to HCV areas there were no animal hunting activities carried out by employees and local residents.

5.2.4

The company has an HCV Monitoring-Management Plan, in the form of boundary marking activities, restoration, erosion observation, flora and fauna, installation of banning boards, river border generally already planted with palm oil. The company has a 3-month buffer zone observation checklist including fauna observation (*Raja Udang Meninting*, cuff, fish species, flora (PTE). Available monitoring results of tree planting in HCV area in 2018 include: GAE: mahogany 1.423; sungkai 345; turi 21 ; sengon 75; angkana 120; trembesi 1; guava 21; waru 64 total 2,081. CH have established HCV management plan, and implemented it well. All of records for patrols on each estate are available and verified by auditors. Management and monitoring activities of HCV contained in the Management and monitoring HCV report. According to the result of management and monitoring evaluation 2018 known that there are protected animal in the areal of PT BSS. The result of monitoring also reported to government. Based on the 2018 HCV monitoring report, it is known that some protected species are still found in the company's management area, while the success of planting woody trees has not been 100 percent. Until now the management plan is still appropriate and effective. As for the results of the evaluation in 2018 for the 2019 management plan, they will include: maintaining HCV and RTE attributes and replacing them if damaged; improve socialization to employees and the surrounding

5.2.5

Based on the results of the ASA 1.1 audit it is known that there is an area of HCV 1.1 (Bukit Kemas) in block D3, E3, F3 Division 3 Gunung Aru Estate; it is known that there are areas that overlap with the community (Betung Village Community). with the overlap the company has made an HCV management agreement with the community which was signed by both parties and witnessed by the authorities such as the Head of Pulau Laut Timur, and representatives of

the BKSDA Kotabaru.

Status: Comply

5.3

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

5.3.1; 5.3.2

Consistently up with the activities of ASA-1.2, the management unit has identified waste in the Mill and the Estate including the type of waste (hazardous waste, domestic waste, industrial waste, infectious waste, and air waste), waste sources, and actions taken in efforts to reduce hazardous waste.

CH conduct an inventory of the waste described in the document evaluation aspects of 2018. The result of inventory in estate and mill as follows:

- Spray activities produce waste, such as former pesticide container placed in hazardous waste warehouse.
- Preparation and maintenance block mark, such as former paint cans, placed in hazardous waste warehouse.
- Plastic waste fertilizer, placed in hazardous waste warehouse.
- Activities in the loading ramp, used sacks lose fruit placed in landfill
- Activities in WTP, waste resulting is ex chemical container placed in hazardous waste warehouse.
- Activities in nursery waste resulting is polybag placed in landfill
- IPM controlling, waste resulting is ex pesticide container placed in hazardous waste warehouse.

Based on field visits in chemical warehouse in GKE PTE and LTE is known the resulting, former chemicals container be placed to hazardous waste warehouse.

According to the document review, used pesticide containers are washed first, after that kept to hazardous waste storage, and then recorded on hazardous waste logbook. Furthermore, used pesticide containers deliver to the licensed waste collector (PT Restu Ibu Kotabaru) by using the licensed transportation dated 15 April 2019. Then, reported to Environment Agency. The Company has reported the hazardous waste management reporting for period October to December 2018 on 10 January 2019 and period January to March 2019 on 29 March 2019.

During audit activities it is known that the company has stored and managed Medical Waste at hazardous waste warehouse and submitted it to licensed hospitals, but legally, the hazardous waste warehouse permit owned by the company has not included medical waste as one type of waste that can be stored at hazardous waste warehouse. In addition, the company has the opportunity to improve the hazardous waste submission mechanism from temporary warehouse to licensed Hazardous waste warehouse in accordance with the SOPs owned. Based on this, this becomes **OFI**

5.3.3

All chemicals and their containers including hazardous waste are disposed responsibly based on procedure 029/BSS-SOP, 1 April 2010. Inventory for all chemicals usage and it containers are available on chemicals storehouse/ temporary hazardous storage. All ex chemicals containers kept on temporary hazardous storage at GKE and GAF, and the company has a permit for hazardous and toxic waste storage issued by decree of Kotabaru regent No. 188.45/301/KUM/2015 for GAP and decree No 503/01/P.LIMB-BPPTPM/2017 for GKE, all of permit still valid.

Document review shown that company has sent all toxic and hazardous waste to PT Restu Ibu Kotabaru (licensed collector by decree of national environmental minister) manifest are available and checked by auditors. Observation during audits at temporary hazardous&toxic waste storage shown that all of hazardous waste are compliant with the periods in permit (< 365 days). Submission of the last hazardous waste carried out on 15 April 2019 in GKE and 23 July 2018 in GAP.

All settlements waste are not disposed off using open fire. Field observation in GKE and PTE for example found that companies managed settlements/housing domestic waste by provide landfill on each division and sort the organic/an-organic waste. Observations also found these landfill are located far away (> 1 km) from housing and situated on flood

free areas.

Based on the results of the field visit to the Division warehouse area in GKE and PTE it is known that there are packs/sacks of used fertilizers that have been collected scattered at several points and less controlled this becomes OFI.

Status: Comply

5.4

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

5.4.1

The company has a plan to increase the efficiency of fossil fuels as stated in the identification and reduction of greenhouse gas (GHG) documents and SOPs on waste management. Some plans that have been implemented are the use and monitoring of renewable energy such as the use of fiber and shells for boiler fuel. Based on monitoring data, the company has calculated the efficiency of the use of renewable energy in terms of energy products / tons of CPO by 60% -70%.

Status: Comply

5.5

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

5.5.1, 5.5.2

The Company has a Land Preparation SOP which contains technical guidelines for clearing land without fires for plantation development as a guide for non-burning land, so that in land clearing activities shall be guided by the contents of the decision letter of Directorate General of Estate Crops. KB 110 / SK / DJ BUN / 05.95 dated May 30, 1995. Beside that, the company has a Fire Prevention and Handling Manual with No. M-077 / HPUI / VIII / 2014 from Head Plantation Upstream Indonesia dated 07 August 2017 which contained that the company implemented Zero Burning Policy in all Minamas plantation activities.

Based on field visits and interviews with workers in Field DO002 Div 2 LTE, it was found that the company did not open land by burning but it was done using the technique of chipping when replanting activities were carried out. Based on Observation to new replanting area in Field C025 there were no indications of land clearing or replanting activities carried out by burning.

Status: Comply

5.6

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

5.6.1

The company has identified pollution and emissions activities including GHG. Pollution / emissions come from activities such as land clearing, fertilization and use of chemicals (spray activities), use of solar in transportation, lighting and processing of FFB, and management of POME.

5.6.2

The company has the implementation of GHG emission management including: establishing a policy of zero burning in land clearing, fertilizer and chemical use in accordance with recommendations, EFB and POME applications on land, routine emission testing, use of fibers and shells as boiler fuel, planting trees in the area riparian.

5.6.3

CH has conducted GHG emission calculations period 2018 Using Calculator Palm GHG version 3.0.1. Accurate data has been put into the RSPO PalmGHG Calculator (Palm GHG version 3.0.1) and has been verified. Summary of net GHG emissions from PalmGHG calculator of the audit report which calculation option is applied "Apply full version".

Emmision per product	tCO2e/tProduct
CPO	2.98
PK	2.98

Production	t/yr
FFB processed	144263.962
CPO produced	30381.797
PK produced	6435.157

Extraction	%
OER	21.06
KER	4.43

Lan use	Ha
Planted area	12408.22
Planted on peat	0
Conservation Area	424.14

Summary of field emission and Sinks

Description	Own crop		Group		3 rd party	
	tCO2e	tCO2e/Ha	tCO2e	tCO2e/tFFB	tCO2e	tCO2e/tFFB
Land conversion	127335.24	10.42				
CO2 emmisions from fertilizer	57419.69	4.77				
N2O emissions	5469.03	0.45				
Fuel comsumption	4537.48	0.37				
Peat oxidation	0	0				
Sinks						
Crop sequestration	-106128.7	-8.7				
Sequestration in Conservation area	-3751.57	-0.31				
Total	84881.15	7			562.12	

Summary Oil Mill Emissions and Credits

Remarks	tCO2e	tCO2e/t FFB
Emissions sources		
POME	23320.44	0.16
Fuel consumption	963.14	0.01
Grid electricity	0	0
Credits		

Export of grid electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	24283.56	0.017

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

Status: Comply

PRINCIPLE #6 Responsible consideration of employees and of individuals and communities affected by growers and mills
6.1

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

6.1.1

The company has an assessment document on social and environmental impacts including:

- 1) Analysis of environmental and social impacts (AMDAL) document with a plantation area of 14,000 ha and factory capacity of 60 tFFB / hour.
- 2) Social Impact Assessment (SIA) document in January 2010. with the village coverage within and / or bordering the company, covering 8 village Pulau Laut Timur subdistrict. The villages include: Langkang Baru Village, Langkang Lama, Betung, Bekambit Asri, Bekambit, Sejakah, Tanjung Pengharapan and Batu Tunau
- 3) Review of the Effect of Replanting Activities on Environmental and Social Aspects in 2012. Replant plans will be carried out from the period of 2011/2012 covering an area of 324.99 Ha; 2012/2013 covering an area of 426.38 Ha and 2013/2014 covering an area of 403.39 Ha.

The results of the identification of social facts and impacts of the existence of the company include: 1. Socio-Economic Welfare of Villagers Still Low; 2. Livelihoods of Villagers: dry land farming and fishermen; 3. Absorption of Local Workers; 4. Local Economic Transactions; 5. Social Contribution by the Company: Education (elementary / junior high school scholarships, internship study places), Health (clinical services and free examination visits to the village); Religion (contribution to repairing places of worship); Village Road Maintenance; 6. Citizens' Claims / Claims: Flood (overflow of river water); Land; 7. Regional Economic Development; 8. Accessibility and Transportation; 9. Development of Education, Health and Social Environment.

Based on the results of interviews with stakeholders, it is known that several social impacts arising from the company's activities have been covered in the 2010 SIA study.

6.1.2

In social and environmental impacts documents, the involvement of the parties affected in the assessment is that the surrounding community consists of 8 village and legal representatives with a total of 23 participants including: Langkang Baru, Langkang Lama, Betung, Bekampit Asri, Bekampit, Sejakah, Tanjung Pengharapan and Batu Tunau.

6.1.3

In social and environmental impacts documents presents plans for mitigating negative impacts, increasing positive impacts, and impact monitoring plan activities. Corporate Social Responsibility (CSR) programs every year are one method to increase positive impacts and reduce negative impacts. For example: the realization of the 2018/2019 CD/CSR program has been evaluated. several plans in the management plan have been carried out such as CSR assistance, recruitment of local employees and local economic transactions.

Based on the results of the document review, it is known that the management plan and Social Monitoring owned are still the same as the previous year, while some of the impacts that emerged during the 2010 SIA assessment were not included in the SIA management plan for 2018/2019 while the results of interviews with the community revealed that the impact still appeared.

CH has established a program of management and handling of social impacts which are prepared based on the SIA study report in 2010 by Polito, the program for the period 2019-2020. In the program of management and monitoring of social impacts owned by the company

- Does not cover all negative issues and impacts that arise in accordance with the results of the SIA assessment, for example; Impact of flooding (river overflow) during the rainy season in Betung Village, Bekambit Village and Bekambit Asri Village. Impact of Land Claims by surrounding community groups, CSR programs
- The impact management and monitoring program has not included a PIC
- There is no evidence made based on participatory results with affected parties.

Not enough evidence is available The program of management and monitoring of the social impacts of the company has covered all issues, prepared based on the consultation process with the affected parties, and has not included the person in charge of the activity **Based on the explanation, raised the non-conformance NC 2019.03 with major category**

6.1.4

Based on the results of the review of the social impact monitoring report document conducted in January 2019, several points were identified as follows: The company has provided assistance in the provision of clean water, rice procurement for the elderly, sacrificial animal assistance and religious events.

in the social impact monitoring report that has been carried out, there is no specific evaluation of each impact that appears or a follow up on the impact, the company shows a management and monitoring plan for 2019-2020 but the company has not shown a biennial review document that is carried out in a participatory manner with stakeholders related.

CH can show the following documents:

- Program for dealing with negative impacts based on the SEIA report by Polito in 2010 for the period 2017-2019.
- PT BSS social impact monitoring report which was held on January 12, 2019.
- Which social impact management and management program is prepared based on the SIA study report in 2010 by Polito, the program for the period 2019-2020.

However, the company has not conducted a 2-year review of the plans and programs for managing the social impacts it has had involving all affected parties (internal and external stakeholders). There is no evidence of a 2-year review of plans and management programs for social impacts that have involved all affected parties. **Based on the explanation, raised the non-conformance NC 2019.04 with minor category**

6.1.5

The company has a development program for smallholder scheme plantation development since 2007. Social Impact Assessment for smallholders was carried out in 2011 and separated document with SIA PT. BSS. Based on the progress report until July 2017, the total Land Cleared is 1,001.86 Ha, with a planting area of 554.32 Ha.

6.1.3	Status: Nonconformity 2019.03 With Major Category	
6.1.4	Status: Nonconformity 2019.04 With Minor Category	

6.2

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

6.2.1, 6.2.2

The CH has had SOP of Communication (No. 28/BSS/SOP/SMK3LH dated 5 May 2015). The procedure of the internal and external communication are described on the document. Another regulated things are the restriction for the sensitive information such as company secret. Those document explain of the list of publicly available document, recording of information request, responses and duration of responses. The PIC appointed for communication were Sustainability Officers of each unit.

Based on interview with stakeholders (workers in Mill and Estate, Labor Union, Gender Committee, Village Official, local contractor, plasma cooperatives) known that the CH has been socialized the prosedur and PIC related communication.

6.2.3

The CH has stakeholder list that updated annually. Stakeholder list consists of regency, sub-district and village government, worker unions, gender committee, cooperative, contractors, traditional leaders, etc. Regarding OFI of ASA 1.2 related added the names of previous landowners to the stakeholders list, the CH shown justification that the previous land owner is too many, and the land compensation carried out since 1990. As well as consultation with Sub District Head of Pulau Laut Timur and Village Head of Sejahkah, obtained information that since the last 2 years there is no issue of land dispute. This continues to be OFI in ASA 1.3 regarding this is still important to continue to identify existing previous land owner as preventive action of land disputes. **OFI.**

Based on interview with management and stakeholders, known that the communication carried out by formally (letter or meeting) and informally (telephone, incidental meeting). The CH has record of formal communication on logbook of incoming letter, and logbook of outgoing letter of CSR. For instance meeting with BKSDA Kotabaru and Village Head Betung dated 20 September 2018 related HCV area.

Status: Comply

6.3

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

6.3.1 & 6.3.2

The CH has had Human Right Policy dated 1 May 2015, stated related freedom of association, no forced labor, no child labor, and decent working conditions. Socialization is carried out during the morning briefing and through notifications on information boards in the Estate and Mill. Based on interviews with workers in Estates and Mill, Labor Union, and Gender Committee, there was no issue related to violations of workers' human rights.

There is no change regarding the mechanism for receiving complaints contained in the procedure for handling complaints in accordance with *SOP Penanganan Keluhan Karyawan* (052/BSS-SOP) dated 27 December 2013 and *SOP Komunikasi* (No. 28/BSS/SOP/SMK3LH) dated 5 May 2015.

Based on interviews with contractors, village representatives and employees during field visits, consulting with representatives of gender committees and worker union, it is known that employees have been notified of submitting complaints to management either directly or using the suggestion box. So far there have been no communication problems with the company.

Procedures for handling complaints and complaints mechanisms have been socialized to workers and the surrounding community. Based on the results of consultations with trade unions and surrounding communities, they have been aware of complaints and / or complaints resolution procedures.

The certificate holder has an *Register Surat Masuk dan Keluar* (Incoming and Outgoing Register) book which specifies the incoming letter regarding the date of the incoming letter, file number, sender, subject and initial of the recipient. Likewise with outgoing letters including explaining the date of the letter out, file number, recipient, subject and initial recipient both regarding complaints, requests for donations and others.

Based on the review of this document, since August 2018, it is known that generally the incoming letters regarding

requests for donations of funds and requests for assistance in heavy equipment.

Status: Comply

6.4

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

6.4.1; 6.4.2

There is no change of the procedure. A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation explained in "*Standar Operating Prosedur (SOP) Pembebasan Lahan Okupasi* (No. Policy: 343/PSD-OKUP/11) dated on 23 February 2012".

6.4.3

The process and outcome of any negotiated agreements and compensation claims namely *Berita Acara Ganti Rugi Lahan* is kept by Plantation Service Department Officer. The latest compensation claim record is in 2013 of an area 221 Ha. All the relevant evidence is provided and well maintained. During ASA 1.3 this case is already resolved in participatory ways.

Status: Comply

6.5

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

6.5.1 & 6.5.2

The certificate holder shows documentation of payment conditions, including briefly presented as follows:

- Decree of the Governor of South Kalimantan dated November 19, 2018 concerning the Regency / City Minimum Wage for 2019 in the South Kalimantan Province which sets the minimum wage for Kotabaru Regency.
- Internal Office Mail from Head Human Resource Management dated December 26, 2018 regarding daily wages in 2019 for Kotabaru Regency. In the Internal Office Mail, it is explained that daily fixed wage increases plus benefits.
- Internal Office Mail from Head Human Resource Management dated January 3, 2019 regarding the fixed daily employee salary and salary structure in 2019 for Kotabaru Regency.

The certificate holder also shows proof of payment of wages according to the above stipulations, for example permanent daily harvest workers in the Laut Timur Estate for the salary period in February 2019, it is known that wages exceed the stipulated minimum wage, namely details of basic wages, harvest premiums, non-harvest premiums, allowance and BPJS. Certificate holder need to ensure the working period of PKWT / contract workers in accordance with regulations.

OFI.

Based on the results of interviews with workers in the field, it is known that workers already know the minimum wage applicable in the company refers to the minimum wage set by the government.

For contractor employees such as contractors carrying kernels and infrastructure, the wages of contractor workers exceed the applicable minimum wages. This was verified through interviews with contractors who stated that the wages of workers were in accordance with the minimum wage. Based on the verification of the Salary Slip document February and April 2019, it is known that the payment of wages is in accordance with the stipulated provisions and none is paid below the minimum wage. Provisions for overtime payments are also in accordance with National Regulations with provisions for calculating overtime, ie 1.5 hours of wages for the first hour of overtime and 2 x one hour of wages for second hour overtime. Based on interviews with worker unions and workers, it was explained that the certificate holder had paid wages in accordance with the minimum wage set by the government and there were no problems regarding the payment or welfare of workers.

Provisions for paying overtime for employees working during working hours have been made in accordance with applicable regulations, such as examples of overtime workers, office workers and factories. Harvesters do not use the overtime payment system, but the system for harvesting premium payments while still receiving basic wages and no

wage violations or forced labor regulations. There are penalties in the form of reductions / penalties for workers who have been arranged, including in the employment contract. For example, in a work agreement letter number LTE / SPK-PKWT / I / 2019/001, dated January 2, 2019, stated in article 6 paragraph 7.3.

Based on interviews with worker unions and workers, it was explained that the certificate holder had paid wages in accordance with the minimum wage set by the government and there were no problems regarding the payment or welfare of workers. Based on the results of interviews with representatives of labor unions and management, it is known that workers have socialized the collective labor agreement which among others regarding employee acceptance, work time, wages, help with sick days, loss of work, overtime work and overtime wages and provisions regarding premiums. Socialization is usually done at the time of the "Apel Pagi".

Based on the results of interviews with workers both in the estate and at the mill, it is known that workers already know the rights and obligations of workers listed in the collective labor agreement including payment of overtime, wages and premium payments.

6.5.3 & 6.5.4

The certificate holder has provided adequate housing and other basic needs such as a decent house, adequate electricity, clean water, medical services and education for children. For example at Pantai Timur Estate, related to housing conditions, based on the results of interviews with workers and supporting documents indicated by the company, it is known that the house has been provided and if there is damage can report to the supervisor or person in charge of housing. The certificate holder shows PTE Employees' Home Improvement Material Recap documents, including the use of wave zinc for home repairs during the period March 2018 – April 2019 for Division 1, Division 2 and Division 3 and use of cement during the period February 2018 – April 2019 for Division 1, Division 2 and Division 3.

The certificate holder also makes a real effort to help workers get adequate and affordable food sources. Based on interviews with workers at PTE, shopping is not difficult because the distance of the market (Sejaka Village and Sungai Buah Village) is close and easily accessible. In addition, there are also vegetable vendors in housing and or payday markets. Based on interviews with employees of cooperative management at Gunung Kemas Estate, cooperatives provide basic necessities at affordable prices.

Based on interviews with GAE independent union leaders, workers easily shop because the dean market + - 3 km from housing. Based on the results of interviews with workers at GAE, it is stated that meeting basic daily needs is easy to obtain because the market is close and there are mobile traders. The certificate holder allows the vegetable to sell at home, allow for a payroll market, and provide cars to buy the needs of employee cooperatives and others.

Status: Comply

6.6

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

6.6.1

The certificate holder has issued a statement in the local language to recognize employee rights for freedom of association. This statement is listed in :

- The freedom of association policy which states that every employee is given the freedom to associate, gather and issue opinions that do not conflict with company regulations and employees have the right to establish a union.
- The code of conduct No 440 / HRM-COC / 07 in business ethics and company commitment with employees is to provide opportunities for employees to express their opinions and aspirations to the company.

The auditor has conducted interviews with unions of workers (independent trade unions) that still exist such as *Serikat Pekerja Mandiri* Gunung Aru Estate and *Serikat Pekerja Mandiri* Pantai Timur Estate.

Evidence that may form a union of workers, among others, the certificate holder shows proof of registration of trade unions number 568/101 / SP / Dinsosnakertrans dated 15 April 2013 from the *Dinas Sosial, Tenaga Kerja dan Transmigrasi* Kotabaru District for *Serikat Pekerja Mandiri* Pantai Timur Estate. Based on the results of interviews with

workers in the field, it is known that the union is active in the company.

6.6.2

The certificate holder shows a meeting document between the union and the company's representatives, including on February 25, 2019 located at the GAE's office with an agenda explaining the function of worker union in bridging between the company and employees and the worker union role in cultivating OHS to all members / employees, for example *Serikat Pekerja Mandiri* participation in helping socialize OHS in town hall safety activities and the presence of reprimands against employees who are not safe driving around the company's area. The meeting was attended by 2 of the worker union and 5 of the companies.

Status: Comply

6.7

Children are not employed or exploited.

Policies related to the minimum age of workers are listed in the Social Policy which was approved by the Upstream Indonesia Plantation Head in December 2011 which states that it is not permitted to use forced labor or underage labor (children). In addition, there is also a New Employee Acceptance Procedure, dated July 10, 2009, which states that the age of the employee at the time of admission must be at least 18 years of age and not more than 40 years old.

Based on Employee List 2019 which describes the birth date of the worker, it is known that all workers are over 18 years old when they are accepted to work. In addition, there were no workers under the age of 18 who visited and interviewed workers. Workers have realized that the minimum age for employment is 18 years and at the time of receipt of work must be equipped with an ID card.

Status: Comply

6.8

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

6.8.1

The certificate holder has had a social policy that was approved by the Head Plantation Upstream Indonesia in December 2011. Several things are designated as the company's commitment, one of which is the fair treatment of all staff in matters relating to recruitment, promotions, restriction and working conditions without regard to personal issues such as race, degrees, ethnicity, gender, skin color, physical, organizational membership, political views, religion or age.

The results of verification of labor list documents, for example documents on the List of Contract Worker and Fixed Daily Worker GKE in 2019, are known to be from various regions, religions, ages etc. In addition, the results of interviews with worker union and workers stated that there were no indications / issues related to discrimination. Certificate holder provide equal opportunities and opportunities in employment opportunities.

6.8.2

Based on the results of document review and field observations, it is known that the certificate holder does not employ migrant workers. Based on Employee List 2019 which explains, among others, the employee's number, name, date of birth, place of birth, ID Card number, date of entry, type of employee and type of salary, it is known that workers come from various ethnicities, religions, regions of origin, ages and types sex.

Based on the results of interviews with workers and workers unions, it was explained that the company did not discriminate against workers from acceptance to promotion. Based on the results of field visits and interviews with workers unions and workers, there were no identified complaints related to discrimination.

6.8.3

Based on the results of interviews with workers in the field regarding the recruitment and promotion process carried out in accordance with applicable procedures, which are listed in the recruitment procedure document as a reference in employee recruitment, document number 431 / HRM-RCT / 07, May 24, 2007.

The certificate holder shows the *Formulir Permohonan Penambahan Karyawan SKU dan Permintaan HR-ID* document,

dated 23 May 2019, which explains 3 harvest workers with contract worker status being submitted to SKU-H (daily fixed worker) and still in the process of being appointed. The certificate holder also shows examples of promotions, for example from the Laut Timur Estate, which describes an old group C2, with a basic salary of Rp. 2,813,509, promoted to new group C3, base salary to Rp. 2,821,539, September 1, 2018.

Status: Comply

6.9

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

6.9.1

The certificate holder has a policy to prevent all forms of sexual harassment and violence, including a gender policy that was endorsed by Head Plantation Upstream Indonesia in April 2011. The policy has been documented, implemented and communicated clearly to all levels of workers. Based on the results of interviews of workers at Pantai Timur Estate and Laut Timur Estate, it is known that female workers are aware of the policy and have been socialized by gender committee representatives such as complaints, sexual harassment and domestic violence to gender committees.

The gender committee shows the organizational structure, for example Gender Committee GAE the 2019 which consists of the chairman, secretary and members of their respective division representatives. Gender Committees show their respective work programs, including those in Gunung Aru Estate, which are planned to provide Health Counseling in May and November and Counseling of domestic violence in June and December. For the Laut Timur Estate there is an extension program for breastfeeding mothers and nutrition for babies. Activities in collaboration with the Berangas Health Center.

Based on the results of interviews with workers in Pantai Timur Estate and Laut Timur Estate as well as representatives of gender committees Gunung Aru Estate and Laut Timur Estate, it is known in each of the estate units that child care facilities are provided by estate and factory.

Based on explanations from workers at Pantai Timur Estate, Laut Timur Estate and representatives of gender committees Gunung Aru Estate and Laut Timur Estate, it was known that spray workers were given the opportunity not to work with chemicals until they stopped breastfeeding. When breastfeeding is given the opportunity to leave work or diverted his work to work close to the housing so that he can breastfeed.

6.9.2

The gender committee shows the minutes of the meeting, including the Laut Timur Estate on March 2, 2019 which discusses the reform of the 2018 commission structure, socialization of gender committees, sports issues, socialization of nutrition information for children and pregnant women and exclusive breastfeeding programs and routine recitation.

6.9.3

The certificate holder has a mechanism to handle complaints, which are listed in the SOP for Employee Complaints Handling with No 052 / BSS-SOP on December 27, 2013 which describes complaints from employees, records in the register, procedures for resolving complaints and complaint handling flowcharts. In the document it has explained the protection of the reporter's identity. Based on the results of interviews with workers in the field, complaints can be directly conveyed to direct superiors such as the foreman, foreman I and assistant.

Based on the results of interviews with workers, for example on Pantai Timur Estate, there were complaints related to housing. The certificate holder responds to housing complaints, for example by showing a warehouse card for housing repair materials accompanied by the name of the owner of the house, date and type of material, for example on March 29, 2019 there was 2 sacks cement expenditure for the employees of Pantai Timur Estate.

Status: Comply

6.10

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

6.10.1 & 6.10.2

The certificate holder shows the document of the cooperation agreement with the cooperative, it is known that the price

of FFB is determined by the relevant agency. The certificate holder shows *Laporan Pengelolaan Kebun Plasma* document, where it is known that currently the income received is still used to pay off installments for the development of plasma.

6.10.3 & 6.10.4

The certificate holder shows the cooperation agreement document to the contractor, for example to the contractor PT Cindra Kasih, namely the Kernel Transport Service Agreement on 28 December 2018 valid until 30 September 2020. Based on the results of interviews with representatives of PT Cindra Kasih, it is known that his party has understood the agreement of the contact that has been signed and the agreement runs as agreed. Each party keeps a copy of the agreement.

The certificate holder also shows proof of payment of work, for example as follows:

1. Bank Voucher for May 21, 2019 for the period July 2018.
2. Minutes of inspection & payment dated August 24, 2018.
3. Payment receipt signed by the contractor for receipt of payment on August 24, 2018.

Based on the results of interviews with the contractor, payments have been running smoothly and on time as agreed.

Status: Comply	
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6.11

Growers and millers contribute to local sustainable development wherever appropriate.

6.11.1

The certificate holder shows contributions to local development, including cooperation with local contractors for empty fruit bunch applications and transport of FFB, financial assistance for village development, operational costs for primary and secondary schools in surrounding villages, maintenance of village roads, other social activities such as medical services and giving qurban.

Based on the results of interviews with the village, it is known that the company has made efforts to develop the surrounding community through CSR programs, development and partnerships with plasma, the use of local labor and local contractors. The effort to improve or maximize employment opportunities in companies for local communities is evidenced by the many local workers who work in estates and mills, work contracts for maintenance and empty fruit bunch applications.

6.11.2

Based on the results of interviews with Cooperative Officials of the KUD Bersama Sejahtera Makmur (scheme smallholder), it is known that the development and maintenance of smallholdings has been done well. Based on production data from the previous year its known if the smallholder started sent FFB to mill since October 2018 and the FFB sent is the result of castration

Status: Comply	
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6.12

No forms of forced or trafficked labour are used.

6.12.1, 6.12.2 & 6.12.3

Based on the results of a review of the list of workers, the appointment letter / agreement letter and the results of interviews with stakeholders such as the surrounding community, trade unions and employees during the field visit, it is known that the certificate holder does not trade labor or forced labor. All workers already have work agreements registered / registered at the Labor Office or letters of appointment from the company.

Based on the results of field visits in operational activities in harvesting activities, manual weeding, application of herbicides, fertilization and others there were no use of forced labor, child labor or family members who helped employees. All workers have agreements with companies.

Based on the results of document review and field observations, it is known that the certificate holder does not employ migrant workers. Based on Employee List 2019 which explains, among others, the employee's number, name, date of

birth, place of birth, ID Card number, date of entry, type of employee and type of salary, it is known that workers come from various ethnicities, religions, regions of origin, ages and types sex.

Status: Comply

6.13

Growers and millers respect human rights

6.13.1

The company has a policy on human rights issued by SOU Chair 06 Gunung Aru PT Bersama Sejahtera Sakti Minamas Plantation dated 01 May 2015 which contains the company's commitment to protect the Human Rights of all Staff / Employees including the right to live, to get married and to continue progeny, right of self-liberty, right to security, right to welfare, the right to participate in government, women's rights and children's rights.

According to the interviews with employees at Gunung Aru and Gunung Kemas Estate, it is known that in addition to the official socialization, socialization related to human rights has also been submitted through morning briefing.

Status: Comply

PRINCIPLE #7 Responsible development of new plantings

7.1

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

7.1.1 up to 7.1.3

No new plantings, operations, or expanding by the company.

Status: Comply

7.2

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

7.2.1, 7.2.2

Based on the Semi Detil Soil Survei of PT Bersama Sejahtera Sakti, it is known that the CH has carried out topographic mapping activities. Based on the map, the operational area consists of a flat topography (level) of 14.10%, undulating (undulating) of 21.01%, corrugated (rolling) of 57.35%, hilly (hilly) of 6.40%, somewhat steep (somewhat steep) of 0.76%, and steep (0.38%). The limitation factors are topography and soil fertility. Based on semi detail was not identified peat area, or others fragile/marginal soil.

The strategy to maintain slope area shown a Memorandum from the GM Business Planning & Administration, dated 01 July 2014 No 03 / BPA.SP-HPUI / VII / 2014 concerning ARM Chapter 4-Land Preparation which explains that the land in the estate area with a slope angle of > 40% (21, 80) so that it is not planted and left to maintain biodiversity, but road access between land planted and those not planted must be made and maintained. On SOP of Erosion Stake (No Dokumen 056/BSS-SOP) state that the CH will installed erosion stakes to measure erosion rates.

Field observation on slope area at Laut Timur Estate Block H21, some implemented strategies such as building individual and contour terrace, planting LCC, selective weeding, frond stacking direct to the terrace, and installing erosion stake.

Status: Comply

7.3

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

7.3.1 up to 7.3.5

The company able to shows the date of the land after November 2005 to December 2009 is 1092.73 ha. While, based

on the HCV identify conducted on November 2010, the company has disclosure of liability and LUCA for planted area period 2007 to 2010 on Pantai Timur Estate. Total LUCA analysis is 131 ha, meanwhile liability final for Pantai Timur Estate is 29 ha. The company has reporting all LUCA to RSPO Secretariat at Augustus 28, 2015 to submit for RSPO remediation and compensation liabilities for land clearance without prior HCV assessment. Based on identification of HCV in 2010, is not identified the rights of local communities (HCV5). Identified HCV attributes include: HCV1.1, HCV1.4, HCV2.3, and HCV 4.1.

However until the ASA 1.3 audit activity the company has not been able to show the concept note that has been approved by the RSPO. Based on the email from the Head of Sustainability SDP on May 9, 2019 to the RSPO secretariat, it was stated from the results of the meeting between the SDP and the RSPO secretariat that the SDP was given 1 year for all nonconformities in the indicator 7.3.1. therefore the discrepancies in indicator 7.3.1 are given time to ASA-1.4. **Based on the explanation, raised the non-conformance NC 2019.01 with major category.**

7.3.1	Status: Nonconformity 2019.05 With Major Category	
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7.4 **Extensive planting on steep terrain, and/or on marginal and fragile soils, is avoided.**

7.4.1, 7.4.2
Based on the Semi Detil Soil Survei of PT Bersama Sejahtera Sakti, it is known that the CH has carried out topographic mapping activities. Based on the map, the operational area consists of a flat topography (level) of 14.10%, undulating (undulating) of 21.01%, corrugated (rolling) of 57.35%, hilly (hilly) of 6.40%, somewhat steep (somewhat steep) of 0.76%, and steep (0.38%). The limitation factors are topography and soil fertility. Based on semi detail was not identified peat area, or others fragile/marginal soil.

The strategy to maintain slope area shown a Memorandum from the GM Business Planning & Administration, dated 01 July 2014 No 03 / BPA.SP-HPUI / VII / 2014 concerning ARM Chapter 4-Land Preparation which explains that the land in the estate area with a slope angle of > 40% (21, 80) so that it is not planted and left to maintain biodiversity, but road access between land planted and those not planted must be made and maintained. On SOP of Erosion Stake (No Dokumen 056/BSS-SOP) state that the CH will installed erosion stakes to measure erosion rates.

Field observation on slope area at Laut Timur Estate Block H21, some implemented strategies such as building individual and contour terrace, planting LCC, selective weeding, frond stacking direct to the terrace, and installing erosion stake.

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

7.5.1
The company has had 4 certificates of land use rights (HGU) that issued in 1995 (8,222.54 Ha), year 2002 (3,318 Ha) and year 2004 (1,200 Ha). Planting year for nucleus (own) estates is between 1988 up to 2009, all plantings is in legal area. Land compensation has been paid prior to land title certificate issued.

There is no new plantings are established since 2009.

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

7.6.1; 7.6.2; 7.6.3; 7.6.4; 7.6.5; 7.6.6
Identification of SEIA is based on Location Permit year 1988 (14,000 Ha). When SEIA is undertaken, scope of identification is based on Location Permit and in that time the land use right is yet issued. However, within SEIA report is

already covered for other land uses over the plantation area and no customary rights were exists.

There is no new plantings are established since 2009.

Status: Comply

7.7

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

7.7.1, 7.7.2

The Company has a Land Preparation SOP which contains technical guidelines for clearing land without fires for plantation development as a guide for non-burning land, so that in land clearing activities shall be guided by the contents of the decision letter of Directorate General of Estate Crops. KB 110 / SK / DJ BUN / 05.95 dated May 30, 1995. Beside that, the company has a Fire Prevention and Handling Manual with No. M-077 / HPUI / VIII / 2014 from Head Plantation Upstream Indonesia dated 07 August 2017 which contained that the company implemented Zero Burning Policy in all Minamas plantation activities.

Based on field visits and interviews with workers in Field DO002 Div 2 LTE, it was found that the company did not open land by burning but it was done using the technique of chipping when replanting activities were carried out. Based on Observation to new replanting area in Field C025 there were no indications of land clearing or replanting activities carried out by burning.

Status: Comply

7.8

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

7.8.1 and 7.8.2

The calculation of the carbon stock shall be conducted after the development of the new estate on August 1st 2014. According to the observation on the PT BSS area statement, there is no new estate development after August 1st 2014. However, the company has made efforts to minimize GHG emissions, such as: use of chemicals (fertilizers and pesticides) according to the recommendations, use of fuels in accordance with the budget, management of mill effluent on WWTP ponds, land application, transport maintenance routinely, etc.

Status: Comply

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

8.1

Growers and millers regularly monitor and review their activities and develop and implement action plans that allow demonstrable continuous improvement in key operations.

The company can show some of improvements as follows:

- 1) The company has built a reservoirs for irrigation which is used to ensure the availability of water in the soil during the dry season, so that plants can grow well.
- 2) The use of Closed End Conservation Trenches method to minimize horn beetle pest attacks and facilitate the transplanting process of seeds to the field.
- 3) Internal Audit of RSPO carried out for scope of PT BSS on 2-6 April 2019. All 20 NC has been followed up and closed on 30 April 2019.

Status: Comply

3.2 Summary of Assessment Report of Supply Chain Requirement
3.2.1. General chain of custody requirements for the supply chain

Clause	Requirement
5.1	Applicability of the general chain of custody requirements for the supply chain
5.1.1	<p>The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. After the end product manufacturer, there is no further requirement for certification.</p> <p>Organization that conduct physically handled of RSPO product is Certificate Holder of Gunung Aru POM and transporter.</p>
	Status: Comply
5.1.2	<p>Traders and distributors require a license obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model.</p> <p>Gunung Aru Mill only processed their own FFB from own manage plantation that have been certified.</p>
	Status: Comply
5.1.3	<p>Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform.</p> <p>Gunung Aru Factory has been registered in RSPO IT Platform member registration number as the data below: Member name : Simedarby Plantation – Gunung Aru POM, PT BSS Account UID : RSPO_AC1000000328 Member ID : RSPO_PO1000000319 Sub License ID : CB28134</p>
	Status: Comply
5.1.4	<p>Processing aids do not need to be included within an organization's scope of certification.</p> <p>There is no processing aids in Gunung Aru POM.</p>
	Status: Comply
5.2	Supply chain model
5.2.1	<p>The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.</p> <p>Gunung Aru POM is implementing model SCCS Mass balance due to mill receive FFB RSPO certified and non-certified.</p>
	Status: Comply
5.2.2	<p>The site can use one (1) or a combination of supply chain models as audited and certified by the CB.</p> <p>Gunung Aru POM is implementing model SCCS Mass balance due to mill receive FFB RSPO certified and non-certified.</p>
	Status: Comply

5.3	Documented procedures
5.3.1	The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified.
	<p>Gunung Aru POM have an update procedures of RSPO, namely Manual RSPO SCCS, SCCS Certification Standard (SCCS-Std/RSPO/PSQM/03 dated 11 May 2018). The procedure has been refer to Supply Chain Requirements November 2014, revised on June 2017. The scope of RSPO Supply Chain System procedure is about FFB Certificate processing from raw material acceptance to storage and delivery process produces Certified Sustainable Palm Oil (CSPO) and CSPK with module D (IP) both physical and office administration. The summary of this procedure were explain on below points:</p> <p>4.2.1. The procedure is documented</p> <p>4.2.2. Internal audits are conducted at least annually to ensure: the organization complies with RSPO SCCS requirements and RSPO Market Communication & Claim documents. Where the internal audit is done at least 2 months before the external audit. The internal audit results are included in the management review conducted at least once a year.</p> <p>4.3. The Mill ensures the purchase of incoming goods, however the marketing division in Jakarta's is responsible for checking the validity of supplier certificates, licenses for traders and distributors.</p> <p>4.3.2. The Unique code/ unique identification number aims to ensure that products are sold through quality tests and can be traced back to the beginning of the process.</p> <p>4.5. Third party activities (outsourcing)</p> <p>4.6. Sales and goods out Units that need to make announcements and trade confirmations in the RSPO IT Platform, this should also include making shipping announcements (each shipment/shipping group by the marketing division). Certified products sold through other schemes or conventional means or in case of lack of production, lost or damaged shall be removed.</p> <p>4.8. Training→ The training plan for RSPO SCCS requirements process should be reviewed continuously/annually.</p> <p>4.9. The record keeping The record keeping of all documents are minimum 10 years for financial report documents and transactions; and minimum two years for data other than financial documents.</p> <p>4.10 Conversion Factor Conversion value is determined by marketing division in Jakarta, based on data sent by Mill on the basis of the resulting of FFB processing, so that the conversion value obtained is the same as the actual obtained by the Mill, and the conversion reference by marketing follows the mill manager monthly report period.</p> <p>4.11. Claim pursuant to RSPO communication and claim.</p> <p>4.12. Complaint Stakeholders may complain by email or face directly to the management representative. The complaint should be handled no later than one month after the complaint is received. Especially for complaints related to salary rights, incentive benefits, product complaints, and payments is should be acted upon no later than 14 days after the complaint has been received. All complaints and responses should be recorded.</p> <p>4.13. Management review Management review plan is established: after internal audit, before external audit checks and minimally done once in twelve months /one year. Input for management review should include information: internal audit results of SCCS requirements, production achievements, customer feedback, preventive and corrective action status, follow up on review management, changes that may affect system management and improvement recommendations.</p> <p>Based on interview with office clerk, PSQM Assistant, and production clerk in Mill, they have been know related SCC Procedure.</p>
	Status: Comply
5.3.2	The site shall have a written procedure to conduct annual internal audit
	<p>Facility can show the internal audit procedure (SCCS-IA/RSPO/PSQM/04) dated 11 May 2018 that's desribed:</p> <p>1. The unit must perform internal audits at least annually to ensure:</p> <ul style="list-style-type: none"> The organization has complied with the requirements of RSPO SCCS and RSPO Document Market Communication and Claim

- Effectiveness of implementation and maintenance of standards within the organization
- 2. Internal audit is performed at least 2 (two) months prior to the external audit carried out. Non conformity that's founds during internal audits should be included in the issue of corrective action. Internal audit results and all corrective actions in correction should be included in the management review which is conducted at least annually.
- 3. Internal audits are scheduled and implemented by the PSQM department

SSCS internal audit conducted on 20 October 2018 and results of internal audit its known if there is 6 (six) findings or non-conformity identified related to supply chain management system. The non-conformity is related about training program and realization, transaction data from palm trace, grievance records and management review. All non-conformity has been follow up by unit.

Status: Comply

5.4 Purchasing and goods in

5.4.1

The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier.

Question :

All RSPO product information is provided by suppliers in accordance with :

- The name and address of the buyer;
- The name and address of the seller;
- The loading or shipment / delivery date;
- The date on which the documents were issued;
- A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);
- The quantity of the products delivered;
- Any related transport documentation;
- Supply Chain certificate number of the seller;
- A unique identification number
- Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation).
- The site receiving RSPO certified oil palm products shall ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements/Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. Refer to section 5.7.1 of this document for further guidance.
- A check of the validity of the Supply Chain Certification of suppliers is required for all sites that are SC certified. This shall be checked via the list of RSPO Supply Chain Certified sites on the RSPO website (www.rspo.org) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements.
- The validity of license for traders and distributors shall also be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcements/announcements.

Gunung Aru Palm Oil Mill is an FFB processing mill to produce CPO and PK. The sources of material input are FFB's from RSPO certified area, non-certified area and third party supplier. This Mill did not purchased CPO and/or PK from others.

Status: Comply

5.4.2

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

CH did not purchased RSPO certified oil palm products, but produced RSPO certified oil palm products.

in the SCCS procedure, clause 4.3 states that if the quality is not in accordance with the specifications, then the raw material will be returned or subject to a penalty

Status: Comply

5.5	Outsourcing activities				
5.5.1					
In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mill cannot outsource processing activities like refining or crushing.					
After processed the FFB, facility only sell their certified product (CPO and PK) to the buyer directly and not seeking outsourcing activities.					
Gunung Aru only using contractor for transporting the CPO and Palm Kernel. Based on field observation and interview with security in GAF the efforts made by the company to ensure that the independent third party / contractors complies with the requirements of the RSPO Supply Chain Certification Standard as follows:					
<ul style="list-style-type: none">security and the dispatch foreman must verify the transport tank before filling in, ensuring that all tank contents have been removed and the tank is completely emptyafter filling it is done sealing the upper manhole and bottom valve and each existing outletsecurity must ensure seals and record transportation data in accordance with existing procedures					
	Status: Comply				
5.5.2					
Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:					
<ul style="list-style-type: none">a. The site has legal ownership of all input material to be included in outsourced processes;b. The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.d. d) The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance					
No	Name of Contractor	Type	Work Agreement	Period of Contrat	
1	Dedy Setiawan	CPO	No. 004/jasa pengangkutan/BSS-Dedy Setiawan/II/2015	28/09/2018	30/09/2020
2	Rakhmadi	CPO	No. 012/jasa pengangkutan/BSS-Rakhmadi/II/2015	28/09/2018	30/09/2020
3	Ahmad Syaukani	CPO	No.010/jasa pengangkutan/BSS-Ahmad Syaukani/II/2015	28/09/2018	30/09/2020
4	Ahmad Dwi Atmoko	CPO	No. 006/jasa pengangkutan/BSS-Ahmad/II/2015	28/09/2018	30/09/2020
5	Iwan Rifindi	CPO	No. 007/jasa pengangkutan/BSS-Iwan/II/2015	28/09/2018	30/09/2020
6	Mariana	CPO	No. 009/jasa pengangkutan/BSS-Mariana/II/2015	28/09/2018	30/09/2020
7	Syahrani	CPO	No. 008/jasa pengangkutan/BSS-Syahrani/II/2015	28/09/2018	30/09/2020
8	H. Masri HD	CPO	No. 011/jasa pengangkutan/BSS-h. Masri HD/II/2015	28/09/2018	30/09/2020
9	Yeni Rahmawati	CPO	No.005/jasa pengangkutan/BSS-Yeni Rahmawati/II/2015	28/09/2018	30/09/2020
10	PT. Cindra Kasih	PK	No. 001/ Jasa Pengangkutan/ MGG-BSS/VI/2016	28/12/2018	30/09/2020
In work aggrement on article 7 point 7.4 in about supply chain mentioned: the second party (contractor) is willing and					

cooperative to carry out an audit by a certification body related to supply chain data if deemed necessary.

Gunung Aru only using contractor for transporting the CPO and Palm Kernel. Based on field observation and interview with security in GAF the efforts made by the company to ensure that the independent third party / contractors complies with the requirements of the RSPO Supply Chain Certification Standard as follows:

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

Status: Comply

5.5.3

The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.

Facility showed record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.

No	Name of Contractor	Type	Address
1	Dedy Setiawan	CPO	Village of Langkang Baru Subdistrict of Pulau Laut Timur District of Kotabaru
2	Rakhmadi	CPO	Village of Langkang Baru Subdistrict of Pulau Laut Timur District of Kotabaru
3	Ahmad Syaukani	CPO	Village of Berangas Subdistrict of Pulau Laut Timur District of Kotabaru
4	Ahmad Dwi Atmoko	CPO	Kotabaru
5	Iwan Rifindi	CPO	Village of Teluk Gosong Subdistrict of Pulau Laut Timur District of Kotabaru
6	Mariana	CPO	Village of Selalru Subdistrict of Pulau Laut Tengah District of Kotabaru
7	Syahrani	CPO	Village of Bekambit Subdistrict of Pulau Laut Timur Kab Kotabaru
8	H. Masri HD	CPO	Village of Selalru Subdistrict of Pulau Laut Tengah District of Kotabaru
9	Yeni Rahmawati	CPO	Kotabaru
10	PT. Cindra Kasih	PK	Kotabaru

Status: Comply

5.5.4

The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products

Based on document verification and interview with PSQM Assistant, until ASA-1.3 there are no new outsources (transporters). The contractor is still ten companies' see clause 5.5.3.

Status: Comply

5.6

Sales and goods out

5.6.1

The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form: The name and address of the buyer

The certificate holder cannot show information related to the name and buyer of RSPO certified products including:

- delivery evidence / Delivery Order / Delivery Note regarding certified products

- Delivery Destination (buyer's name) certified product
- Volume and delivery of certified products
- SCCS model used
- Buyer's name and address
- Documentation of product delivery

Based on that's explanation raised Non Conformity No 2019.06 With Major Category

5.6.1	Status: Non Conformity No 2019.06 With Major Category
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5.7	Registration of transactions
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5.7.1

Supply chain actors who:

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

PT Bersama Sejahtera Sakti, subsidiary of Sime darby plantation Bhd has registered in RSPO membership 1-0008-04-000-00 since 8 September 2004

Gunung Aru Factory has been registered in IT platform palm trace RSPO <https://palmtrace.rspo.org/web/rspo/member-directory> which information as follows:

Member name : Sime darby Plantation – Gunung Aru POM, PT BSS
 Account UID : RSPO_AC1000000328
 Member ID : RSPO_PO1000000319
 Sub License ID : CB28134
 Core Product: Palm Oil & Palm Kernel
 Member Category: Oil Mill

	Status: Comply
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5.7.2

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

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

The certificate holder cannot show evidence that all transactions of RSPO certified products are following actions in the RSPO IT Platform. This is because the company cannot show evidence regarding

- Shipping announcement documentation
- Products sold as CSPO or CSPK, can be traced (for example from positive stock or short sell)
- Remove stock against products sold as conventional or other schemes

Based on that's explanation raised Non Conformity No 2019.07 With Major Category

5.7.2	Status: Non Conformity No 2019.07 With Major Category
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5.8	Training
5.8.1	<p>The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff</p> <p>Company can presented SCCS training programme 2019 listed on SCCS training programme 2019, for examples consists of SCCS refreshment for Mill PIC. Company have conducted SCCS refreshment training programme for 2019.</p>
	Status: Comply
5.8.2	<p>Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed</p> <p>In 2018 training program has been conducted on 06 October 2018 and 10 October 2018 with the participants are Manager, Senior assistant, Assistant, Head of administration, and workers with the total of participants are 13 workers. training material is background of RSPO SCCS, the aim of SCCS Implementation, model of SCCS and process SCCS. However, the results of document studies and interviews show that training material has not been specific to explaining the tasks that apply at PT BSS, for example about :</p> <ul style="list-style-type: none"> - Receiving FFB from certified and non-certified PT BSS areas - Documentation of certified and non-certified production <p>Based on that's explanation raised Non Conformity No 2019.08 With Major Category</p>
5.8.2	Status: Non Conformity No 2019.08 With Major Category
5.9	Record keeping
5.9.1	<p>The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements</p> <p>The certificate holder cannot show evidence of documenting accurate, complete, updated and accessible records / records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements including;</p> <ul style="list-style-type: none"> - Data reception FFB certified and non-certified - Data CPO production of certified and non-certified - PK Production Data of certified and non-certified - Sales data for certified and non-certified CPO products - Sales data for certified and non-certified PK products <p>Based on that's explanation raised Non Conformity No 2019.09 With Major Category</p>
5.9.1	Status: Non Conformity No 2019.09 With Major Category
5.9.2	<p>Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock</p> <p>Facility showed the procedure regarding to retention time for all records and reports of supply chain. The 2016 documents can be showed during the audit conducted.</p>
	Status: Comply
5.9.3	<p>The organization shall be able to provide the estimate volume of palm oil / palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.</p> <p>In the RSPO SCCS Manual (RSPO Supply Chain Certification Standard) document No. SCCS-Std / RSPO / PSQM / 03</p>

dated 11 May 2018 at Point 4.9 it is mentioned organization shall be able to provide the estimate volume of palm oil / palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.

Estimates of CPO and PK produced by GAF obtained from the actual data of 12 months before the audit activities and have been described in this ASA-3 report as follows:

- FFB : 168,684 MT
- CPO : 37,954 MT
- PK : 8,012 MT

The claimed (output) over a period of twelve (12) months of RSPO certified has been records by the certificate holder as follows:

- FFB : 148,435 MT
- CPO : 32,238.33 MT
- PK : 6,865.34 MT

	Status: Comply
5.10	Conversion factors
5.10.1	Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org); RSPO Rules for Physical Transition of Oleochemicals and its Derivatives. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries
	The Facility did not using conversion rate.
	Status: Comply
5.10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.
	The Facility did not using conversion rate.
	Status: Comply
5.11	Claims
5.11.1	The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.
	The Facility did not using logo during communication with stakeholder / customer.
	Status: Comply
5.12	Complaints
5.12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.
	Facility has had documented procedures for stakeholders complaints in chapter 4.11 (Complaint).
	Status: Comply
5.13	Management review
5.13.1	

The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken	
<p>In the RSPO SCCS Manual (RSPO Supply Chain Certification Standard) described if</p> <ol style="list-style-type: none"> 1. The organization should establish a management review plan implemented: <ul style="list-style-type: none"> • After internal audit • Before external audit • Minimum once in 12 months (1 year) 2. Input for management review should include the following information: <ul style="list-style-type: none"> • Internal audit results of SCCS requirements • Achievement of production • Feedback from customers • Status of preventive and corrective actions • Follow up on prevention and improvement • Changes that can affect the management system • Recommendations for improvement 	
	Status: Comply
<p>5.13.2</p> <p>The input to management review shall include information on:</p> <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard. • Customer feedback. • Status of preventive and corrective actions. • Follow-up actions from management reviews. • Changes that could affect the management system. • Recommendations for improvement. 	
<p>Documents verifications its known if the last management review in conducted on 1 November 2018, with the content of management review including:</p> <ul style="list-style-type: none"> - Internal audit findings - Complaints from stakeholder - Process performance and product of GAF - Status of preventive and corrective actions - Follow up from previous management review: - Recommendations for improvements: - Any changes of Management System influence, - Recommendations for Improvement 	
	Status: Comply
<p>5.13.3</p> <p>The output from the management review shall include any decisions and actions related to:</p> <ul style="list-style-type: none"> • Improvement of the effectiveness of the management system and its processes. • Resource needs. 	
<p>Improvement of the effectiveness of the management system and its processes and resource needs is already included within the Management Review.</p>	
	Status: Comply

3.2.2. Module E – CPO Mills: Mass Balance Requirements

Clause	(Module E) CPO Mills - Mass Balance Requirements
E.1	Definition
E.1.1	<p>Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and volume sales of RSPO certified producers. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p> <p>Based on observation on FFB receiving in security and weighbridge station known that GAF received FFB from certified plantation namely GAE, GKE, LTE and PTE which is scope of this ASA process and uncertified area. Furthermore the CH since October 2018 Gunung Aru Mill Received FFB from smallholders and third party supplier.</p>
	Status: Comply
E.2	Explanation
E.2.1	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the CB in the public summary of the P&C certification report. This figure represents the total volume of certified palm oil product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced should then be recorded in each subsequent annual surveillance report.</p> <p>The estimated tonnage of CPO and PK products for next license period as follows: FFB : 168,684 MT CPO : 37,954 MT PK : 8,012 MT</p>
	Status: Comply
E.2.2	<p>The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).</p> <p>Gunung Aru Factory has been registered in RSPO IT Platform member registration number as the data below:</p> <p>Member name : Simerdarby Plantation – Gunung Aru POM, PT BSS Account UID : RSPO_AC1000000328 Member ID : RSPO_PO1000000319 Sub License ID : CB28134</p> <p>Gunung Aru Factory has been registered in the RSPO IT Platform, but the Gunung Aru Factory has not been able to show evidence of reporting to the RSPO IT Platform related to RSPO certified product transactions, for example</p> <ul style="list-style-type: none"> - Documentation shipping announcement - Remove stock of the product that is sold as conventional or other schemes - Sales data for certified and non-certified CPO products - Sales data for certified and non-certified PK products <p>Based on that's explanation raised Non Conformity No 2019.10 With Major Category</p>
E.2.2	Status: Non Conformity No 2019.10 With Major Category
E.3	Documented procedures
E.3.1	

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

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

Gunung Aru POM have an update procedures of RSPO, namely Manual RSPO SCCS, SCCS Certification Standard (SCCS-Std/RSPO/PSQM/03 dated 11 May 2018). The procedure has been refer to Supply Chain Requirements November 2014, revised on June 2017. The scope of RSPO Supply Chain System procedure is about FFB Certificate processing from raw material acceptance to storage and delivery process produces Certified Sustainable Palm Oil (CSPO) and CSPK with module D (IP) both physical and office administration. The summary of this procedure were explain on below points:

- 4.2.1. The procedure is documented
- 4.2.2. Internal audits are conducted at least annually to ensure: the organization complies with RSPO SCCS requirements and RSPO Market Communication & Claim documents. Where the internal audit is done at least 2 months before the external audit. The internal audit results are included in the management review conducted at least once a year.
- 4.3. The Mill ensures the purchase of incoming goods, however the marketing division in Jakarta's is responsible for checking the validity of supplier certificates, licenses for traders and distributors.
- 4.3.2. The Unique code/ unique identification number aims to ensure that products are sold through quality tests and can be traced back to the beginning of the process.
- 4.5. Third party activities (outsourcing)
- 4.6. Sales and goods out
Units that need to make announcements and trade confirmations in the RSPO IT Platform, this should also include making shipping announcements (each shipment/shipping group by the marketing division). Certified products sold through other schemes or conventional means or in case of lack of production, lost or damaged shall be removed.
- 4.8. Training→ The training plan for RSPO SCCS requirements process should be reviewed continuously/annually.
- 4.9. The record keeping
The record keeping of all documents are minimum 10 years for financial report documents and transactions; and minimum two years for data other than financial documents.
- 4.10 Conversion Factor
Conversion value is determined by marketing division in Jakarta, based on data sent by Mill on the basis of the resulting of FFB processing, so that the conversion value obtained is the same as the actual obtained by the Mill, and the conversion reference by marketing follows the mill manager monthly report period.
- 4.11. Claim pursuant to RSPO communication and claim.
- 4.12. Complaint
Stakeholders may complain by email or face directly to the management representative. The complaint should be handled no later than one month after the complaint is received. Especially for complaints related to salary rights, incentive benefits, product complaints, and payments is should be acted upon no later than 14 days after the complaint has been received. All complaints and responses should be recorded.
- 4.13. Management review
Management review plan is established: after internal audit, before external audit checks and minimally done once in twelve months /one year.
Input for management review should include information: internal audit results of SCCS requirements, production achievements, customer feedback, preventive and corrective action status, follow up on review management, changes that may affect system management and improvement recommendations.

Based on interview with office clerk, PSQM Assistant, and production clerk in Mill, they have been know related SCC Procedure.

Status: Comply

E.3.2

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

Based on the results of the document review, and interviews with the management, it is known that there is an area of \pm 761.41 Ha of area which is not included in the scope of certification and which is managed under each estate. The results of the field visit and document verification revealed that some of these areas were located in the same block as the nucleus estate (certification area).

The company has a SCCS (SCCS-std / RSPO / PSQM / 03) procedure that regulates the receipt of FFB. However, in the procedure, it is only related to the mechanism for receiving certified products and non-certificates from suppliers. The SCCS procedure that is owned by the company has not explained about

- Mechanisms and implementation in the field are related to the separation of RSPO-certified and non-certified FFB, especially in blocks whose area is divided between certified or non-certified areas
- Method of recording / documenting receipt of certified and non-certified FFB on Gunung Aru Factory

Based on that's explanation raised Non Conformity No 2019.11 With Major Category

E 3.2 **Status: Non Conformity No 2019.11 With Major Category**

E.4 **Purchasing and goods in**

E.4.1

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

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

Gunug Aru Factory has maintain accurate, complete and up-to-date for the FFB receives, process and CPO & PK production from its supply bases.

Months	FFB RECEIVE (Kg)	
	RSPO Certified	NON Certified
May 2018	12,316,490	
June 2018	11,504,300	
July 2018	13,032,380	
August 2018	12,394,470	
September 2018	13,880,820	41,033
October 2018	14,854,130	792,391
November 2018	12,288,840	1,539,084
December 2018	13,425,080	1,841,724
January 2019	12,151,170	1,616,167
February 2019	9,964,400	1,267,361
March 2019	11,551,310	1,652,205
April 2019	11,072,340	1,509,696
TOTAL	148,435,730	10,259,661

Status: Comply

E.4.2

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

In procedure for the implementation of supply chain in the identification procedure and Traceability. This procedure states that in case the projection is exceeding the claim of certified product, then company should perform: informs related RSPO certification body

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

Products	Last Year Projected Certified Volume (MT)	Additional Volume	Total	Last Year Actual Certified Volume (MT)
FFB Own Estate	128,291			148,435.73
CPO	26,299			32,238.33
PK	6,158			6,865.34

Status: Comply

E.5 Record keeping

E.5.1

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

Based on the results of a document verifications, it is known that:

- Facilities / Mill have not been able to show evidence of recording and balancing all RSPO certified FFB and RSPO certified CPO shipments on a 3 (three) monthly basis
- Facilities / Mill have not been able to show evidence that all CPO and Palm kernel that are sold as certified products are RSPO certified CPO and PK.
- Facilities / Mill have not been able to show evidence that the sale of certified products must come from positive stock (Verification on palm trace for the May 2018 - April 2019 period contained CPO and PK sales data, but it is not clear whether CPO / PK sold from certified sources, non-certificates, or a combination of both).

Based on that's explanation raised Non Conformity No 2019.13 With Major Category

E 5.1 Status: Non Conformity No 2019.13 With Major Category

3.3 Conformity Checklist of Certificate and Trademark Use

1.	Evidence of permission or approval certificate and logo from Certification Body which submitted by Client	X or√
ASA-1.3	Sime Darby Plantation Bhd as parent company of PT BSS has had trademark license with number RSPO-1106024 During field observation and documents review PT BSS does not use RSPO logo/trademark.	√
	Status: Comply	
2.	Implementation of certificate and logo used by Client comply with size and type (shape) against Guideline of Logo Use	X or√
ASA-1.3	Sime Darby Plantation Bhd as parent company of PT BSS has had trademark license with number RSPO-1106024 During field observation and documents review PT BSS does not use RSPO logo/trademark.	√
	Status: Comply	
3.	Implementation of Certificate and Logo is not used on product	X or√
ASA-1.3	Sime Darby Plantation Bhd as parent company of PT BSS has had trademark license with number RSPO-1106024 During field observation and documents review PT BSS does not use RSPO logo/trademark.	√
	Status: Comply	
4.	Controlling of Certificate and Logo, including withdrawing inappropriate logo.	X or√
ASA-1.3	Sime Darby Plantation Bhd as parent company of PT BSS has had trademark license with number RSPO-1106024 During field observation and documents review PT BSS does not use RSPO logo/trademark.	√
	Status: Comply	

3.4 Summary of RSPO Partial Certification.

Compliance of the uncertified management units of Sime Darby Plantation Bhd 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

Sime Darby Plantation Bhd Time Bound Plan is explained in table section 1.10. Sime Darby has achieved 34 management units in Malaysia and 24 Management Units in Indonesia that RSPO certified. Total management unit in Sime Darby Plantation Bhd are 34 in Malaysia, 25 in Indonesia and 1 in Liberia. Sime Darby Plantation Bhd has informed the Time Bound Plan progress through representative's office in Indonesia. MUTU has considered that Sime Darby Plantation Bhd is comply with the RSPO requirement for Time Bound Plan. The Time Bound Plan was revised and declared by the Sime Darby Plantation Bhd Indonesian representative on May 2018 by the Head of Sustainability..

MUTU has verified partial certification for un-certified unit's subsidiary of Sime Darby Plantation Bhd based on their Time Bound Plan. 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:

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

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.2.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p>Company Group/Holding Statement: Companies are already doing internal audits. There are internal audit reports for each company. Latest partial audit are held in July – December 2018, for five unit and three smallholder scheme</p> <p>Auditor Verification: Internal Audit report available for uncertified management uni. Latest partial audit are held in July – December 2018, for five unit and three smallholder scheme</p>
i.	<p>No replacement after dates defined in NIs Criterion 7.3 of:</p> <ul style="list-style-type: none"> • Primary forest. • Any area identified as containing High Conservation Values (HCVs). • Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3. 	<p>Company Group/Holding Statement: HCV assessment has been conducted for uncertified units i.e. Sime Darby Plantation Liberia operations (by RSPO approved assessors – Dr SK Yap in 2011).</p> <p>Auditor Verification: Sime Darby Plantation Bhd sent disclosure of liability including LUCA analysis to RSPO Secretariat on 2 December 2014 and 2nd revision on 24 June 2016. Current status of LUCA report of SDP Bhd has been sent the 19 Report of LUCA to RSPO on August 2018, responded by RSPO with need clarification. The</p>

		companies ensuring reporting of disclosure of liability progress to RSPO and according to the CB's correspondence with RSPO Remediation and Compensation
i.	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>Company Group/Holding Statement: A new mill will be set up in Liberia and planned for commissioning in February 2016. Preparation to undergo the RSPO Certification process is in progress and SDP targets to undergo RSPO Certification by end 2017. RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps is in progress. *Note: RSPO NPP Announcements for SDP can be found at http://www.rspo.org/certification/new-planting-procedures/public-consultations/page/14</p> <p>Auditor Verification:</p> <ul style="list-style-type: none"> • Karya Palma Estate (PT Sandika Natapalma) and Baturus Estate (PT Budidaya Agro Lestari) any new planting after January 1st 2010 and due to not conduct NPP. • RSPO NPP process has been completed in 2011 for a new mill in Liberia.
ii.	Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	<p>Company Group/Holding Statement: Sime Darby (Liberia) Plantation Inc. Status: Box G - Close for Monitoring Further details please refer to: http://www.rspo.org/members/complaints/status-of-complaints/view/46</p> <p>Auditor Verification: Auditor has verified the supporting evidence of above the company statement. There are land conflict in :</p> <ul style="list-style-type: none"> • PT Bina Sains Cemerlang, this issue was raise on 22 April 2017 and still being process to resolve.
iii.	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	<p>Company Group/Holding Statement: No stakeholder comments or complaints received.</p> <p>Auditor Verification: Auditor has verified the supporting evidence of above the company statement. There are no labour dispute in company unit.</p>
iv.	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	<p>Company Group/Holding Statement: None noted. No stakeholder comments or complaints received.</p>

		<p>Auditor Verification: Auditor has verified the supporting evidence of above the company statement. There is any legal non-compliance for company under SDP waiting for land title process, ie:</p> <ul style="list-style-type: none"> • PT Sime Indo Agro 1,652 Ha • PT Aneka Inti Persada 421.31 Ha • PT Bina Sains Cemerlang 308.25 Ha • PT Bersama Sejahtera Sakti 765 Ha • PT Langgeng Muaramakmur 1,162 Ha • PT Paripurna Swakarsa 1,120 Ha • PT Swadaya Andika 63 Ha • PT Bahari Gembira Ria 1,639 Ha • PT Guthrie Pecconina Indonesia 4,133 Ha • PT Perkasa Subur Sakti 1,286 Ha
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3.5 Identification of Findings, Corrective Action, Observations, Opportunity for Improvement and Noteworthy Positive Components.

3.5.1. Identification of Findings, Corrective Actions and Observations at ASA 1.2 Assessment

NCR No.	: 2018.01	Issued by	: Trismadi N
Date Issued	: 31 August 2018	Time Limit	: ASA – 1.3
NC Grade	: Minor	Date of Closing	: 24 May 2019
Standard Ref. & Requirement	: 4.4.1 A water management plan must be available that is implemented		
Non-Conformance Description & Evidence observed (filled by auditor): The company can not show the water management plan especially related to replanting activity.			
Evidence Observed <ul style="list-style-type: none"> From the 115 Ha land application area according to the permit, there was only 53 Ha (46%) that used for land application activity. Based on interview with land application officer, known there are sedimentation in flat bed that cause increasing leakage risk. Based on water quality testing on 2018, Total Solid Suspension (TSS) in Sejakah River was over the threshold. 			
Root Cause Analysis (filled by organization audited): <ol style="list-style-type: none"> The number of flatbed available today, when the rainy season has the potential for overflow Lack of systems / application controls for waste operators 			
Correction (filled by organization audited): <ol style="list-style-type: none"> Progress of flatbed washing and addition of a flatbed unit of 1733 units Evaluation and making rotation of liquid waste applications appoint 3 new operators - attached the decree, Also attached is a recap of the realization of waste applications from January to March 2019 			
Corrective Action (filled by organization audited): Making an application schedule for guidelines for operators and the control process so as not to overflow to the environment.			
Assessor Evaluation and Conclusion (filled by auditor): Verification 27 April 2019 The company shows some proof of improvement as follows:			
<ol style="list-style-type: none"> Inspection & Payment Minutes (BAPP) Flatbed making and washing according to SPK No GAE / SPK-LKL / III / 2019-011 related to Excavator rental activities dated April 18, 2019 with a number of new flatbed 1,292 units in Division I and flatbed washing of 441 units in Division I. The schedule for rotating liquid waste applications at Gunung Aru Estate in 2019 can be found in the following blocks: 			
Field	Blok	Flatbed	Month
A005	N3	63	
	N4	729	
A006	N5	308	Feb, May, Aug, Sept
	N6	105	
A008	O2	787	Mar, Jun, Sept, Dec
	O3	1,137	
A015	O4	1,916	Jan, Apr, Jul, Oct
	P7	525	

Auditor Conclusion:

Please be shown the recording of the realization of the application of liquid waste from January to March 2019, and indicated the appointment of the officer responsible for controlling the LA area. To prevent no overflow in the future.

Verification May 24, 2019

- Documents on the realization of application liquid waste for January-March 2019, it is known that the number of applications for liquid waste every month is January 12,960 M3, February 4,320 M3, March 12,000 Ha.
- Appointment of liquid waste application operator from Estate manager to Idrus (127952) with the appointment number 119c / GAE/ III / 2019 dated March 30, 2019, concerned is set and works as a waste effluent operator on April 1, 2019.
- Appointment of liquid waste application operator from Estate manager to Sucipto (127935) with the appointment number 119b / GAE / III / 2019 dated March 30, 2019, concerned is set and works as a waste effluent operator on April 1, 2019.
- Appointment of operator of liquid waste application from Estate manager to Sumiarto (16055) with the appointment number 119a / GAE / III / 2019 dated March 30, 2019, concerned is set and works as a waste effluent operator on April 1, 2019.
- Based on the results of field observations to the Land Application area of field A08 Gunung Aru Estate, no indication of leakage in the Land Application area.

Based on root cause analysis, correction, preventive action and evidence of improvement indicated, the non-conformity 2018.01 is stated to be fulfilled.

Verified by : **Trismadi N / Bayu Yogatama**

NCR No.	: 2018.02	Issued by	: Trismadi N
Date Issued	: 31 August 2018	Time Limit	: 29 November 2018
NC Grade	: Major	Date of Closing	: 15 September 2018
Standard Ref. & Requirement	4.4.2 Protection of water bodies and wetlands, including maintaining and maintaining river boundaries and other buffer areas at the time of or before replanting, must be demonstrated		
Non-Conformance Description & Evidence observed (filled by auditor): The company has identified a river border with a width of 50 m and its protection procedures. However, it was found that there were replanting activities on the Laut Timur Estate that left 2 palm oil staples, this was not in accordance with the procedures and results of HCV identification.			
Root Cause Analysis (filled by organization audited): <ul style="list-style-type: none">• The river border area borders the collection road• There is an understanding for supervisors that Collection road is the boundary of the buffer zone			
Correction (filled by organization audited): <ul style="list-style-type: none">• Planting forest plants• Conduct refresher training regarding HCV management• Install the HCV / Buffer zone signboard and the yellow paint mark• Re-socialization of HCV management has been carried out, the minimum buffer zone.			
Corrective Action (filled by organization audited): <ul style="list-style-type: none">• Monitoring local tree planting in HCV areas			

- Monitoring the condition of HCV signboard every 3 months
- Socialize the HCV area for contractors replanting regularly

Assessor Evaluation and Conclusion (filled by auditor):
Verification 7 September 2018

The company has provided evidence of planting bungur, sungkai and laban (September 1-4, 2018) in an open area of 188 trees and evidence of socialization of river borders to employees.

However, the company has not shown delineation data on the river border area including

1. Total river border area (according to HCV identification)
2. The border area of the river that has been replanted
3. Area (length x width) of the border of the river that has been replanted (bungur, sungkai and laban on September 1-4, 2018)

Verification 15 September 2018

The company has provided proof of record

1. The results of monitoring timber plantations covering an area of 0.526 ha in the HCV LTE area (Laut Timur Estate) and its progress
2. Records of the delineation area of the river border in the Laut Timur Estate and changes in HCV area from 23.30 Ha to 23.48 Ha equipped with maps

The company has shown footage of planting wood plants and their progress in the border of the LTE (HCV) river. With the proof NC 2018.02 it was declared closed by observation.

Verified by : Trismadi N

NCR No.	: 2018.03	Issued by	: Satria Adi Putra
Date Issued	: 31 August 2018	Time Limit	: ASA 1.3
NC Grade	: Minor	Date of Closing	: 24 May 2019
Standard Ref. & Requirement	4.6.4 Documentation evidence that chemical substances categorized as Type 1A or 1B World Health Organization (WHO) or materials included in the list of Stockholm and Rotterdam Conventions, and paraquat, are not used, except in special situations has been identified in national best practice guidelines. The use of these pesticides must be minimized and eliminated as part of the pesticide use plan except in specific conditions that have been identified in national best practice guidelines.		
Non-Conformance Description & Evidence observed (filled by auditor): Based on the results of field visits to the Gunung Aru Estate chemical warehouse and material stock document studies, it is known that there is still procurement of Sime Ebor Bait on February 27, 2018 totaling 1,100 kg with the last stock at the time of the audit visit (August 29, 2018) at 24.81 kg. Related to this, the company has not been able to show evidence regarding the program / plan for reduction and justification regarding the minimization of the use of group 1A and 1B pesticides in the PT BSS environment.			
Root Cause Analysis (filled by organization audited): PIC's misunderstanding to justify that the pesticide class is determined in the package, which is based on a combination of active ingredients and mixing ingredients.			
Correction (filled by organization audited):			

Provide justification that Sime Ebor Bait is included in WHO class III

Corrective Action (filled by organization audited):

Ensure understanding of PIC, and ensure that pesticides used are not included in WHO class 1A or 1b

Assessor Evaluation and Conclusion (filled by auditor):

Verification of 24 May 2019:

The CH shown justification that the packaging of the Sime Ebor Bait TM pesticide product with the active ingredient Warfarin was 0.05%, while the remaining 99.95% is a mixing ingredients, showing a light blue color (packaging color symbol) which means it has WHO III class.

Reference:

- In the document The WHO Recommended Classification of Pesticides by Hazard and Guidelines to Classification 2009, on page 4 states that if the formulation contains more than one ingredient (including solvents, wetting agents, etc) of significant toxicity enhancing properties, then the classification should correspond to the toxicity of the mixed ingredients. This means that the toxicity class of pesticide products is determined by the combination of the ingredients making up the product, which is assessed by the manufacturer.
- In the 2015 WHO & FAO Guidelines on Good Labeling Practices for Pesticides document, page 51 explains the coding in pesticide packaging, including those related to color bands (color symbols on packages) consisting of red for Ia and Ib classes, yellow for the class II, and blue for class III.
- In addition the CH shown other documentation related to efforts to reduce pesticides for rat control, such as periodic census data of rat pests (showing controlled levels), records of monthly pesticide use, and biological control efforts by installing and monitoring owl cages.

Based on this explanation, this NC state as comply.

Verified by : **Arif Faisal Simatupang**

NCR No.	: 2018.04	Issued by	: Satria Adi Putra
Date Issued	: 31 August 2018	Time Limit	: 29 November 2018
NC Grade	: Major	Date of Closing	: 8 September 2018
Standard Ref. & Requirement	4.6.5 Proof of application of pesticides must be available by trained personnel and in accordance with the instructions for use on product labels and storage instructions. Adequate work safety equipment must be provided and used. Product warnings must be observed, understood and applied correctly by workers (see Criterion 4.7).		
<i>Non-Conformance Description & Evidence observed (filled by auditor):</i> There is no evidence that the application of adequate work safety equipment must be provided and used. Warnings about products must be observed, understood and applied correctly by workers. Based on field visits to circle spray and pest / disease control spray on Gunung Kemas Estate, it is known that PPE (Mask) used by workers is still not in accordance with the MSDS. There are still MSDS who are still using foreign languages (English) so that they cannot be understood by the officers handling the chemicals, including MSDS Rock Phosphate, Cieserit and NPK Compound in the fertilizer warehouse and MSDS Racumin at Gunung Aru Estate chemical warehouse. Based on the field visit to Blok B036, Division 3, Gunung Kemas Estate is known that during pest spray activities, the			

workforce draws water from Siltpit / Water Bodies. This is not in accordance with the circular GKE-Division / 0161 / VIII / 2017 / s which states that "water for pest spray uses water from reservoirs that are shunted using trucks or vehicles"

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

1. Water shunters from the pest & disease spray team did not work at the time of the visit
2. The ineffectiveness of spraying SOPs on the pest & disease spray team
3. The supervision of pest & disease spray supervision has not been maximized

Correction *(filled by organization audited):*

- - Re-socialize SOPs Spray to spray team Pests & diseases
- - Reaffirmation of the Memorandum of water supply to spray pests & diseases from the GKE Estate Manager
- - Appointment of water shed officers for the pest & disease spray team
- - Conduct training for spray teams Pests & diseases

Corrective Action *(filled by organization audited):*

- - Provide a warning letter to the supervisor (foreman) of pest & disease spray team, foreman 1, and assistant division
- - Reappoint the spray team coordinator at the Estate Unit
- - Conduct training to the team to spray pests & diseases regularly
- - Provision of water supply using jerry cans (not ex-agrochemical)

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

Verification September 6, 2018

The company has shown corrective actions including:

- Letter No. GKE / 010 / IX / 2018/5 September 1, 2018 concerning Confirmation of Water Supply for Pest Spray by reference to the Minamas Plantation Agronomy Reference No Policy: 110 / EST-ARM / 13 and No.3 / SPO-BSS / 10 dated April 10, 2010 which states that pest spray water uses clean water from reservoirs that are shunted using trucks / vehicles.
- First warning letter to Assistant Division, Overseer I, Spray Overseer for oversight and control oversight when pest spray takes water from siltpit / waterbodies that do not comply with SOP.
- Appointment of the coordinator of the Block Spraying System Team to Mr. Purnomo as Acting Sr. Assistant to the Gunung Kemasan Estate Packaging in accordance with Letter No. GKE / 010 / IX / 2018/6 September 1, 2018.
- Appointment of HPT special shunters for Division I, II and III Gunung Kemasan Estate.
- Minutes of Training for the Pests and Diseases Spraying Team on 1 September 2018 to the Division Assistant, Overseer I, Spray Overseer and GKE Spray Team (Divisions 1, 2 and 3), with one standard stipulating that water supply for spray needs in the field using jerry cans diluted from the traction reservoir to the field at the supply point.
- List of spray training attendance on September 1, 2018 to 22 operators operating weed spray and disease pests.
- Documentation in the form of morning briefing photos with pest spray employees.

Verification September 8, 2018

The company has shown evidence of improvements including:

- Memorandum Area Controller PLT No.010 / AC.EM / IX / 2018, dated September 7, 2018 concerning the Spray Policy for HPT Area Replanting to All Marine Island Estate Managers & Assistant Areas and BSS SOPs Pests & Diseases approved on September 7, 2018.
- SOP for Occupational Health and Safety Improvement Program published on September 1, 2018
- Appointment of coordinator of the Laut Timur Estate Block Spraying System Team to Mr. Ali S on September 7, 2018.
- Appointment of coordinator of the Pantai Timur Estate Block Spraying System Team to Mr. Agus Agus Ripana Pelawi on September 7, 2018.
- Appointment of the Gunung Aru Estate Block Spraying System Team coordinator to Mr. Andi on September 7, 2018.
- Minutes of MSDS socialization for head of warehouse, spray foreman and spray team on September 7, 2018.
- Photo of supply and purchase of jerry cans for water supply in spraying pests & diseases.
- Proof of handover of Mask PPE (Respirator P1) that is in accordance with the MSDS.

Based on the above, non-conformity No. 2018.04 declared fulfilled.

Verified by	:	Satria Adi Putra
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NCR No.	:	2018.05	Issued by	:	Andi Pratama Pasaribu
Date Issued	:	31 August 2018	Time Limit	:	ASA 1.3
NC Grade	:	Minor	Date of Closing	:	26 April 2019
Standard Ref. & Requirement	:	4.7.5 Emergency and work accident procedures must be available in Indonesian as well as available workers who have received first aid training in the work area			
Non-Conformance Description & Evidence observed (filled by auditor): Completeness of the contents of the first aid kit along with the monitoring system. Based on the results of field visits in the application of pesticides and harvests in GAE and GKE it is known that the contents of the first aid kit are not in accordance with national regulations related to the availability of first aid kits in the workplace. In addition, the system cannot be demonstrated and demonstrated to monitor the completeness of the first aid kit contents.					
Root Cause Analysis (filled by organization audited): 1. Lack of understanding of supervision related to the control of the contents of the first aid box which has so far only been carried out by safety officers 2. The use of the contents of the first aid box, but there has been no report for the refill process					
Correction (filled by organization audited): <ul style="list-style-type: none">Refill the contents of the first aid kit according to the regulations that apply to each supervisionConduct socialization to every supervisor / worker to always check the availability and validity period of the contents of the first aid kit					
Corrective Action (filled by organization audited): Every supervisor / holder of a first aid kit must complete a checklist of the contents of the first aid kit every month and report it to the safety officer					
Assessor Evaluation and Conclusion (filled by auditor): Verification April 26, 2019 The company has sent proof of improvement in the form of proof of socialization of First Aid Box and OHS SOP in the work environment. This socialization was held on August 30, 2018 and was attended by 7 traction employees (mechanics, welders, drivers, clerk and safety officers). Also available is a checklist check box contents first aid box by the safety officer and the addition of the contents of the box in accordance with existing standards. Auditor's Conclusion April 26, 2019 Based on the evidence of improvements that have been shown, this non conformity is declared close with observation .					
Verified by	:	Andi Pratama Pasaribu			

NCR No.	:	2018.06	Issued by	:	Andi Pratama Pasaribu
Date Issued	:	24 May 2019	Time Limit	:	23 August 2019
NC Grade	:	Minor raised to Major	Date of Closing	:	19 August 2019
Standard Ref. & Requirement	:	4.7.6 All workers must be provided with health services and protected by work accident			

	insurance
Non-Conformance Description & Evidence observed <i>(filled by auditor):</i>	
Based on the results of the field visit and document review, it is known that the company has a cooperation contract with the contractor (third party), but the system cannot be shown to ensure all contractor workers have been included in the guarantee / health insurance and work accident programs.	
Root Cause Analysis <i>(filled by organization audited):</i>	
The contractor has not provided proof / guarantee that his employee has been given a job guarantee.	
Correction <i>(filled by organization audited):</i>	
<p>From the results of the company's communication with the contractor, they agreed and provided proof of payment for the work guarantee of their employees.</p> <p>Attached proof of fulfillment in the form of :</p> <ol style="list-style-type: none"> 1. Registration of BPJS PT.Cindra Kasih 2. Registration of BPJS Koperasi Sejahtera Makmur (Empty Fruit Bunch Contractor) 3. Registration of BPJS Transportir CPO 4. Registration of BPJS Transportir FFB 5. Work Agreement Addendum that the contractor is required to register the BPJS and stated in the Job Inspection Report 6. Proof of deposit of BPJS PT. Cindra Kasih 	
Corrective Action <i>(filled by organization audited):</i>	
<p>The company has communicated and ensures that each contractor has provided guarantees to its employees, and if there is a new Work Agreement, it will be added as a condition.</p> <p>The mechanism is by giving an addendum to each work agreement or even when making a new work agreement mandatory namely there is a clause of the contractor's obligation to register and pay BPJS labor to each worker, and proof of payment must be submitted to the company. The officer who will make sure is each head of administration (Head of Section / Head of Administration).</p>	
Assessor Evaluation and Conclusion <i>(filled by auditor):</i>	
<p>Verification on 16 May 2019</p> <p>The company has shown proof of correction in the form of BPJS Employment proof of payment for replanting contractor employees (PT. Central Pratama Property) on March 4, 2019.</p> <p>Verification on 24 May 2019</p> <p>The certificate holder shows proof of improvement in the form of an Empty Fruit Bunch Application Work Agreement sample number LTE / SPK-INTERN / III / 2019/036-JJK dated March 25, 2019 in which there is a clause "the second party must include workers in Social Security "</p> <p>However, based on the results of interviews with contractors and contractor workers in the field, information was obtained as follows:</p> <ul style="list-style-type: none"> • Based on the results of interviews with PT Cindra Kasih, information was obtained that for PT Cindra Kasih workers 8 out of 23 workers had not been registered with the <i>BPJS Ketenagakerjaan</i> program • Based on the results of interviews with Empty Fruit Bunch application contractor workers in LTE (contractor on behalf of M. Hizbulloh / Koperasi Sejahtera Makmur), it is known that the worker has worked for 2 months but has not been registered in the <i>BPJS Ketenagakerjaan</i> program. <p>Besides the results of document review and interviews with the company, there is no evidence that all Contractor employees working with PT BSS have been included in the BPJS Employment program.</p> <p>Based on the explanation above, the non conformity in this indicator is declared unfulfilled.</p>	

Verification on August 8, 2019

The certificate holder shows the following evidence of improvement:

1. Documents for the List of Contractors of PT Bersama Sejahtera Sakti along with their BPJS Employment number, which explains that there are 7 contractors with the type of palm product transport activities, empty fruit bunch application and FFB transport.
2. Addendum document-1 Work Agreement Letter - Intern number LTE / SPK-INTERN / III / 2019/037-JJK on behalf of the Koperasi Bersama Sejahtera Makmur, which explains related the additional provisions to article 7 namely the second party (contractor) must register all workers to BPJS Employment, is obliged to submit proof of deposit BPJS Employment and the first party (PT BSS) will deduct BPJS Manpower costs when submitting Minutes of Work Inspection, if the second party cannot show proof of payment of BPJS Employment. The Addendum was agreed by both parties and signed on August 2, 2019.
3. Employer Registration Document (form 1 BPJS Employment) in the name of the Koperasi Bersama Sejahtera Makmur, NAP 19174290, dated July 29, 2019, which explains the number of 3 workers and has been a participant since July 2019.
4. Membership Certificate of BPJS Employment of Koperasi Bersama Sejahtera Makmur, Company Registration Number 19174290, dated July 29, 2019 as well as participant cards for 3 workers.
5. Detailed Employment Contribution Documents, Company Registration Number 19174290, name of employer / business entity Koperasi Bersama Sejahtera Makmur, July 29, 2019, which describes 3 workers Koperasi Bersama Sejahtera Makmur (contractor) has registered a work accident insurance program, life insurance and day insurance old BPJS Employment.
6. Proof of transfer / deposit BPJS Employment dated July 29, 2019 of Rp. 523,564 via Bank Mandiri Koperasi Bersama Sejahtera Makmur
7. Detailed Employment Contribution Documents (form 2a PU BPJS Employment), Company Registration Number 14009415, name of the company / work unit of Cindra Kasih, report period 08 2019, dated July 18, 2019, which explains that 41 workers of PT Cindra Kasih (contractor) have registered a guarantee program work accident, life insurance and old age insurance BPJS Employment.
8. Detailed Employment Contribution Documents (form 2a PU BPJS Employment), Company Registration Number RR021123-000, name of the employer / business entity CPO Transport Services and Material Yeni Rahmawati, dated August 1, 2019, which explains 6 workers who have registered work accident insurance program, life insurance and old age insurance BPJS Employment.
9. Detailed Employment Contribution Documents (form 2a PU BPJS Employment), Company Registration Number 19123294-000, name of employer / business entity Transport Services CPO Dedy Setiawan, dated August 1, 2019, which explains 4 workers have registered a work accident insurance program, life insurance and BPJS Employment pension benefits.
10. Detailed Employment Contribution Documents (form 2a PU BPJS Employment), Company Registration Number 19130088-000, name of employer / business entity FFB Transport Contractor Unit PT BSS – Pantai Timur Estate, dated 1 August 2019, which explains 3 workers have registered work accident insurance program, life insurance and old age insurance BPJS Employment.

Verification on August 19, 2019

The certificate holder shows evidence of improvement in the form of BPJS Employment transfer / deposit dated July 12, 2019 amounting to Rp. 6,631,818 via bank transfer on behalf of PT Cindra Kasih.

Based on the analysis of the root cause of the problem presented, the corrective actions shown and the corrective actions taken, the auditor has been able to accept what has been presented. Then this non conformity is stated comply by observation in the next assessment.

Verified by : **Andi Pratama Pasaribu/ Afiffuddin**

NCR No.	: 2018.07	Issued by	: Trismadi N
Date Issued	: 31 August 2018	Time Limit	: 29 November 2018

NC Grade	:	Major	Date of Closing	:	13 September 2018
Standard Ref. & Requirement	:	5.1.3 An environmental monitoring plan document and a report on its implementation are available as well as an improvement plan for the results of the monitoring if discrepancies are found. This plan is reviewed at least once every two years.			
Non-Conformance Description & Evidence observed (filled by auditor): <p>The company has not been able to show evidence that it has carried out environmental monitoring in accordance with the monitoring matrix contained in the AMDAL document such as the structure of the type composition of plankton and Benthos.</p>					
Root Cause Analysis (filled by organization audited): <ul style="list-style-type: none"> - There are limited tools to monitor plankton and benthos 					
Correction (filled by organization audited): <ul style="list-style-type: none"> - Have applied for testing of aquatic biota with Lambung Mangkurat University - Has enclosed the Approval Letter of Water Biota Testing Cost submitted by Lambung Mangkurat University - Has monitored plankton and benthos 					
Corrective Action (filled by organization audited): <ul style="list-style-type: none"> - Working closely with external laboratories that can monitor plankton and benthos regularly 					
Assessor Evaluation and Conclusion (filled by auditor): Verification September 13, 2018 <p>The company shows some proof of improvement as follows:</p> <ol style="list-style-type: none"> 1. Memorandum of Region KSS Agronomist on 10 September 2018 to PPLH University of Lambung Mangkurat regarding the application for Analysis of Changes in Aquatic Biological Habitat (Plankton, Benthos, Nekton) as many as 8 sample points. 2. Letter of Head of PPLH, Lambung Mangkurat University No. 297 / UN8.2.1 / DN / 2018 dated 10 September 2018 to the leader of PT Bersama Sejahtera Sakti; regarding offering sampling services and lab analysis of aquatic biota. 3. Letter from the KSS Agronomist Region dated 12 September 2018 to the CEO of the SSC Region, regarding the approval of the cost of sampling services for analysis of aquatic biota as many as 8 samples by the PPLH University of Lambung Mangkurat. The letter was approved by the CEO of the SSC Region. 4. Letter of Assignment from PPLH Lambung Mangkurat University No. 299 / UN8.2.1 / PL / 2018 dated September 13, 2018 to carry out samples of aquatic biota at PT BSS by two people on September 18-20, 2018. 					
Auditor Conclusion: <p>Based on evidence of improvements that have been shown, then this mismatch has been fulfilled by observation.</p>					
Verified by	:	Trismadi N			

NCR No.	:	2018.08	Issued by	:	Trismadi N
Date Issued	:	31 August 2018	Time Limit	:	29 November 2018
NC Grade	:	Major	Date of Closing	:	13 September 2018
Standard Ref. & Requirement	:	5.3.3 A documented and implemented waste management plan must be available to avoid and reduce pollution			
Non-Conformance Description & Evidence observed: <p>The company has not been able to show evidence of managing domestic waste to avoid and reduce pollution.</p>					

- Companies (GKE & LTE) have Landfill located in low-lying areas that have the potential for pollution when inundated
- Waste collection point is not carried out by landfill
- Management of used paint cans in mill that are not in accordance with hazardous waste management procedures

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

1. The monitoring of waste collection point management has not been consistent
2. There has not been any socialization of the management of hazardous waste paint cans in mill

Correction *(filled by organization audited):*

1. Carry out old waste collection point stockpiles and not be reused as waste collection point locations
2. Installing a ban on disposing of garbage in the old waste collection point area
3. Making new waste collection point in each estate with a location that has no potential for pollution when inundated
4. Demonstrate Decree of Appointment of waste collection point officers in each estate location
5. Provide a monitoring form for checking waste collection point conditions
6. Re-socializing hazardous waste management to employees (Minutes Attached)

Corrective Action *(filled by organization audited):*

1. Monitor the condition of waste collection point regularly
2. Periodically maintain waste collection point
3. Install signboards for the location of the new waste collection waste
4. Conduct socialization of hazardous waste identification and management periodically

Assessor Evaluation and Conclusion *(filled by auditor):*
Verification September 12, 2018

1. The company shows some proof of improvement as follows:
2. Minutes and documentation of closure of waste collection point in Field B050, Division III, Gunung Kemas Estate; and the creation of a new waste collection point in Field B026, Division II, Gunung Kemas Estate.
3. Records of socialization of the cleanliness of huts from garbage and the period of transportation in Gunung Kemas Estate on September 1, 2018 to 54 employees.
4. Minutes of meeting on September 7, 2018 regarding household / domestic waste management in employee huts with garbage transport schedules:

Sunday	Tuesday	Friday
I	Division I	Division II
II	Division III	Division I
III	Division II	Division III
IV	Division I	Division II

5. Records of monitoring waste disposal in the GKE every Tuesday and Friday from January to September 2018.
6. Decree of the GKE Manager regarding the appointment of the responsible person to monitor the GKE temporary waste collection point a.n. Sugianor, dated January 1, 2018.
7. Documentation of waste collection poin/landfill in LTE, Block C013 consists of organic, an organic and water trap; and the waste disposal monitoring form and waste collection point conditions. Where is the waste disposal schedule for each division: Division 1 (Friday), Division II (Wednesday & Thursday), and Division III (Monday & Thursday).
8. Decree of the LTE Manager regarding the appointment of the responsibility to monitor GKE temporary waste collection point LTE a.n. Wasito Mulyatin, dated September 10, 2018.
9. Minutes & handover documentation of used paint cans from mill to temporary hazardous waste point of 0.0042 tons dated September 3, 2018.
10. Logbook entry of used paint cans dated September 3 2018 as much as 0.0042 tons from Mill.
11. Records of socialization related to hazardous waste management to 47 mill employees dated September 1, 2017.

Auditor Conclusion:

Based on evidence of improvements that have been shown, this non conformity has been fulfilled.

Verified by : **Trismadi N**

NCR No.	: 2018.09	Issued by	: Trismadi N
Date Issued	: 31 August 2018	Time Limit	: 29 November 2018
NC Grade	: Major	Date of Closing	: 18 September 2018
Standard Ref. & Requirement	General Chain of Custody Requirements 5.5.2 Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following: a. The site has legal ownership of all input material to be included in outsourced processes; b. The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary. c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. d. The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance		
Non-Conformance Description & Evidence observed (filled by auditor): The certification unit showing the draft Addendum IV No. 010/Jasa pengangkutan/BSS-Ahmad Syaukani/II/2015 dated 29 March 2018 about CPO transport from Gunung Aru Factory to the Stagen Jetty valid to 30 September 2018. However the certification unit has no been able to show the CPO transport agreement signed by both of parties.			
Root Cause Analysis (filled by organization audited): 1. CPO & PK transport contract was made in Jakarta Head Office and signed by director.			
Correction (filled by organization audited): 1. Agreement between CPO&PK transport with the company has been signed.			
Corrective Action (filled by organization audited): Head of administration will be coordination with Legal Department regarding to period of agreement at least before 3 month of expiring date.			
Assessor Evaluation and Conclusion (filled by auditor): Verification on 18 September 2018 The company was shown addendum VI of transport contract, such as: 1. No. 004/Jasa Pengangkutan/BSS-Dedy Setiawan/II/2015 dated 29 March to 30 September 2018 – CPO transport from GAF to the Stagen port. 2. No. 005/Jasa Pengangkutan/BSS-Yeni Rahmawati/II/2015 dated 29 March to 30 September 2018 – CPO transport from GAF to the Stagen port. 3. No. 006/Jasa Pengangkutan/BSS-Ahmad/II/2015 dated 29 March to 30 September 2018 – CPO transport from GAF to the Stagen port.			

4. No. 007/Jasa Pengangkutan/BSS-Iwan/II/2015 dated 29 March to 30 September 2018 – CPO transport from GAF to the Stagen port.
5. No. 008/Jasa Pengangkutan/BSS-Syahrani/II/2015 dated 29 March to 30 September 2018 – CPO transport from GAF to the Stagen port.
6. No. 009/Jasa Pengangkutan/BSS-Mariana/II/2015 dated 29 March to 30 September 2018 – CPO transport from GAF to the Stagen port.
7. No. 010/Jasa Pengangkutan/BSS-Ahmad Syaukani/II/2015 dated 29 March to 30 September 2018 – CPO transport from GAF to the Stagen port.
8. No. 011/Jasa Pengangkutan/BSS-H. Masri D/II/2015 dated 29 March to 30 September 2018 – CPO transport from GAF to the Stagen port.
9. No. 012/Jasa Pengangkutan/BSS-Rakhmadi/II/2015 dated 29 March to 30 September 2018 – CPO transport from GAF to the Stagen port.

Based on above evidences, this nonconformance has been closed.

Verified by : Trismadi N

NCR No.	: 2018.10	Issued by	: Trismadi N
Date Issued	: 31 August 2018	Time Limit	: 29 November 2018
NC Grade	: Major	Date of Closing	: 28 November 2018
Standard Ref. & Requirement	General Chain of Custody 5.7.2. The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform: <ul style="list-style-type: none"> • Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures. • Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually. • Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed. • Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements. 		

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

Not all RSPO Certified Products sales transactions for the period of January to July 2018 are registered on the RSPO Palm Trace. Based on the RSPO Supply Chain Certification Revision Standard June 14th, 2017 and socialization from the RSPO. It was explained that since January 2018 all RSPO Certified products sales as conventional is should be registered in the RSPO Palm Trace. Therefore based on record keeping data period of January to July 2018 there are RSPO Certified product sales as follows:

Product	Production (Ton)	Sales (Ton)	Claim RSPO (Ton)	RSPO Product sold as Conventional (Ton)
CPO	14,745.12	14,438.85	7,805.55	6,633.30

PK	3,198.79	3,194.28	1,722.57	1,471.71
<p>However RSPO certified products sales as conventional is not registered on the RSPO Palm Trace with CPO: 6,633.30 MT and PK: 1,417.71 MT.</p>				
<p>Root Cause Analysis <i>(filled by organization audited):</i> There is no monitoring of the amount of stock RSPO claimed and conventional due to the limited number of PIC.</p>				
<p>Correction <i>(filled by organization audited):</i> CSPO has been removed amount 6,633.3 ton and CSPK amount 2,020.34 ton.</p>				
<p>Corrective action <i>(filled by organization audited):</i></p> <ul style="list-style-type: none"> • Head of administration will be coordination with PSQM staff every quarter month. • The PSQM staff will be monitor palmtrace trading by Jakarta Marketing Department. 				
<p>Verification on 28 November 2018 The company was shown removing of CSPO and CSPK on Palm trace amount 6,633.3 MT CSPO and 2,020.34 MT CSPK.</p>				
<p>Based on above evidences, this nonconformance has been closed.</p>				
<p>Verified by : Trismadi N</p>				

NCR No.	:	2018.11	Issued by	:	Trismadi N
Date Issued	:	31 August 2018	Time Limit	:	29 November 2018
NC Grade	:	Major	Date of Closing	:	13 September 2018
Standard Requirement	Ref. & :	E.2.1. The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the CB in the public summary of the P&C certification report. This figure represents the total volume of certified palm oil product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced should then be recorded in each subsequent annual surveillance report.			
Non-Conformance Description & Evidence observed <i>(filled by auditor):</i> The certification unit has not been able to shown RSPO Certified MB projection products for period of 21 October 2018 to 20 October 2019.					
Root Cause Analysis <i>(filled by organization audited):</i> Projection FFB from smallholders is not received by the mill management.					
Correction <i>(filled by organization audited):</i> Create the FFB, CPO and RSPO IP or MB projection from own estate and other sources.					
Corrective Action <i>(filled by organization audited):</i> PSQM with Head administration and PSD will be coordination with smallholders regarding to FFB.					
Assessor Evaluation and Conclusion <i>(filled by auditor):</i> Verification on 13 September 2018 The certification unit was shown CPO & PK projection (MB) period of October 2018 to October 2019, CPO: 8,766 MT and PK: 1,717 MT.					

Based on above evidences, this nonconformance has been closed.

Verified by : **Trismadi N**

3.5.2. Identification of Findings, Corrective Actions and Observations at ASA 1.3 Assessment

NCR No.	: 2019.01	Issued by	: Afiffuddin
Date Issued	: 24 May 2019	Time Limit	: 22 August 2019
NC Grade	: Major	Date of Closing	: 13 August 2019
Standard Ref. & Requirement	: 4.7.2 All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers.		
Evidence observed (filled by auditor): <p>The certificate holder already has a risk assessment document for estates and factory, but based on the results of document verification, it is known that there are several activities in the field that have not been identified as potential hazards and risks, but are not limited to:</p> <ul style="list-style-type: none"> • Census activities and pest control • Activities in the nursery area, • Observation activities of pole and HCVs, • Grading & weighing activities • Security work. <p>In addition, based on the results of a sample field visit in the estate & factory it is known that there are several Risk Controls that have not been implemented such as :</p> <ul style="list-style-type: none"> • Spray workers found in GAE block O34 do not use eye protection • Loaders found in GAE block J2 do not use the appropriate PPE • PKWT/ contract workers found in the sorting section in GAF are not provided with PPE • Contractors found on the Pantai Timur Estate did not use PPE 			
Non-Conformance Description (filled by auditor): <p>Based on the explanation above, the company has not been able to show that all activities both in the estate and in the factory have been carried out risk assessment and monitoring of the implementation has not been in accordance with what has been determined.</p>			
Root Cause Analysis (filled by organization audited): <ul style="list-style-type: none"> • There is no internal PIC to carry out monitoring related to HIRARC documents available in the unit (Mill / estate) so that the HIRARC documents are incomplete. 			
Correction (filled by organization audited): <p>HIRARC documents will be evaluated internally by P2K3, while externally by PSQM staff, the attached HIRARC documents are as follows:</p> <ol style="list-style-type: none"> 1. HIRARC Census and pest control 2. HIRARC Nurseries 3. HIRARC Observation of pole and HCV 4. HIRARC Sorting 5. HIRARC Weigh Bridge 6. HIRARC Security 7. Daily PPE monitoring 8. Minutes of hand over Spray glasses PPE, contract workers Team Sorting PPE, Loader PPE and PPE Contractor 			

Corrective Action *(filled by organization audited):*

The mechanism is to conduct an internal HIRARC evaluation by P2K3 and PSQM, while internal daily PPE monitoring is supervised by each.

Assessor Evaluation and Conclusion *(filled by auditor):*
Verification on August 8, 2019:

The certificate holder shows the following evidence of improvement:

1. Activities in the field that have not been identified the potential hazards and risks
 - HIRARC of Gunung Aru POM document for FFB Reception stations, revised 3, dated January 1, 2019, which among others explains the 3 potential hazards.
 - Mature Plant Risk Assessment Document for Nursery work, which among them explains that there are 32 potential hazards from 16 nursery activities.
 - Mature Plant Risk Assessment Documents for Security work, which among them explain there are 10 potential hazards from 4 activities in security work.
 - Mature Plant Risk Assessment Document for land use title pole observation work, which among them explains that there are 8 potential hazards from 3 activities in land use title pole observation work.
 - Mature Plant Risk Assessment Document for HCV pole observation work, which among them explains that there are 9 potential hazards from 3 activities in HCV pole observation work.
 - Mature Plant Risk Assessment Document for pests and diseases plant census work, which among others explains that there are 8 potential hazards of 3 activities in pests and diseases plant census work.
 - Mature Plant Risk Assessment Document for pest spray / fulpogs work, which among others explains that there are 11 potential hazards from 1 activity in pest spray / fulpogs work.
 - Mature Plant Risk Assessment Documents for NPV Trunk Injection & Virus Application work, which among others explain that there are 11 potential hazards from 2 activities in NPV Trunk Injection & Application Virus work.
 - Mature Plant Risk Assessment Document for Rat Poison Application work, which among them explains that there are 7 potential hazards from 3 activities in rat poison application work.
2. Risk Control that has not been implemented
 - Pantai Timur Estate PPE Checklist document for the period January - June 2019
 - Laut Timur Estae PPE Checklist document for May and June 2019
 - Gunung Aru Estate PPE and Working Tools Protection Checklist period June 2019
 - PPE Monitoring Documents and Attendance for Safety Briefing at Gunung Aru POM Laboratory Department for May and June 2019
 - PPE Monitoring Document for workshop workers and the Gunung Aru POM process for May and June 2019

Based on the results of verification on August 8, 2019 related to the analysis of the root cause presented, corrective actions shown and corrective actions taken, the non-conformity was declared unfulfilled.

Verification on August 13, 2019

The certificate holder shows the following evidence of improvement:

1. PPE Handover Minutes document on 29 June 2019 in the form of 8 pairs of safety shoes and 8 pcs helmets by CV Sinar Timur Baru (contractor).
2. PPE Handover Minutes document on January 10, 2019 in the form of 10 pairs of safety shoes and 10 pcs helmets by Jansin (contractor).
3. PPE Handover Minutes document on 29 June 2019 in the form of 7 pairs of safety shoes and 7 pcs helmets by Musrifin

(the contractor).

4. PPE Handover Minutes document of Chemical Upkeep worker PPE dated March 8, 2019 in the form of obstruction to 17 workers.
5. PPE Handover Minutes document of FFB Transport Division II in 2018 – 2019 in the form of helmets and boots to 5 workers.
6. PPE Handover Minutes Gunung Aru Estate document on 24 June 2019 to 3 grading contract workers in the mill in the form of helmets, cloth gloves and safety shoes.
7. HIRARC of Gunung Aru POM document for loading ramp – grading station, revised 3, dated January 1, 2019, which among others explains the 6 potential hazards.
8. SOP and HIRARC Grading Training & Socialization document, dated July 29, 2019 at the Gunung Aru Factory Loading Ramp to PT BSS Grading Team.

Based on the analysis of the root cause of the problem presented, the corrective actions shown and the corrective actions taken, the non conformity is stated to be comply by observing the next assessment.

Verified by : **Afiffuddin**

NCR No.	: 2019.02	Issued by	: Bayu Yogatama
Date Issued	: 24 May 2019	Time Limit	: 22 August 2019
NC Grade	: Minor Raised to Major	Date of Closing	: 13 August 2019
Standard Ref. & Requirement	5.1.3 Environment monitoring plan document, its implementation report, and the corrective plan (if non-conformance arised from the monitoring result) shall be available. This plan is reviewed on two-yearly basis.		
Evidence observed (filled by auditor): CH shows a report on the implementation of Semester II <i>RKL-RPL</i> (July - December) in 2018 and proof of delivery of reports to the Environmental Office of Kota Baru District, Office of Environment of South Kalimantan Province and Ministry of Environment and Forestry through (SIMPEL) on 30 January 2019. Based on the results of the report on the implementation of the <i>RKL-RPL</i> , the following are known: <ul style="list-style-type: none">• There are no discussions regarding erosion management and monitoring• There is no management and monitoring regarding changes in habitat for aquatic biota (plankton and benthos)• There are still surface water quality test parameters that exceed the quality standards that have not been evaluated For example: BOD and COD in the Upper-Lower Betung River, Sekajah River and Bekambit River.• There is no available attachment for monitoring the presence of flora and fauna as proof of management and monitoring the impact of disturbed flora and fauna carried out every six months.• Not yet attached the proof of interview and questionnaire as a form of management and monitor the impact of community unrest that is carried out every six months.			
Non-Conformance Description (filled by auditor): Referring to the explanation above, the company has not been able to show a complete document on the implementation of the environmental management and monitoring plan in accordance with the guidelines for preparing the <i>RKL / RPL</i> implementation report (KepMenLH No. 45 of 2005).			
Root Cause Analysis (filled by organization audited): There has not been a person in charge of the completeness of documents and cross checks before sending reports			
Correction (filled by organization audited): The attached <i>RKL RPL</i> Sem I 2019 draft which has been improved is related to the discussion of river water analysis and other			

test results, besides supporting documents, as follows:

1. Attachment of monitor results and evaluation of erosion rate
2. Attachment of results of animal monitoring
3. Attachments and recap of the questionnaire
4. Appendix BA sampling benthos (while waiting for lab test results)

Corrective Action (filled by organization audited):

Set PSQM as PIC related to RKL-RPL report and CH will cross-check document completeness by administrative staff, PSQM, and PSD to ensure completeness before reporting.

Assessor Evaluation and Conclusion (filled by auditor):

Verification 13 August 2019

The company shows some evidence of improvements in the form of:

- The 2019 Semester 1 RKL-RPL report which has included management and monitoring related to Erosion impacts, has conducted evaluations related to BOD and COD contents that exceed the Quality Standards and has attached documentation of flora and fauna monitoring
- Anxiety Impact Monitoring Questionnaire conducted in May 2019 and the Anxiety Impact Monitoring Recapitulation of the results of the Questionnaire provided.
- Flora and Fauna checklist in the first quarter of 2019 in the PT BSS area
- Minutes of taking Biota Air Samples by CV Prima Solusi Enviro on July 31, 2019

Based on the evidence of the improvements shown, analysis of the root causes, corrections and corrective actions of non-conformities are stated to be fulfilled with a note that they will be verified during the next audit activity. OFI

Verified by : **Bayu Yogatama**

NCR No.	2019.03	Issued by	Bayu Yogatama
Date Issued	24 May 2019	Time Limit	22 August 2019
NC Grade	Major	Date of Closing	13 August 2019
Standard Ref. & Requirement	6.1.3 Plans for management and monitoring of social impacts to avoid or reduce negative impacts and promote positive ones, based on social impact assessment, through consultation with the affected parties, shall be available, documented and timetabled, including responsibilities for implementation.		
Evidence observed (filled by auditor): The company has established a program of management and handling of social impacts which are prepared based on the SIA study report in 2010 by Polito, the program for the period 2019-2020. In the program of management and monitoring of social impacts owned by the company <ul style="list-style-type: none">Does not cover all negative issues and impacts that arise in accordance with the results of the SIA assessment, for example; Impact of flooding (river overflow) during the rainy season in Betung Village, Bekambit Village and Bekambit Asri Village. Impact of Land Claims by surrounding community groups, CSR programsThe impact management and monitoring program has not included a PICThere is no evidence made based on participatory results with affected parties.			
Non-Conformance Description (filled by auditor): Not enough evidence is available The program of management and monitoring of the social impacts of the company has covered all issues, prepared based on the consultation process with the affected parties, and has not included the person in			

charge of the activity

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

- The company has not been able to conduct a comprehensive and participatory study because there are not yet available aspirations from the public or the results of meetings between the company and the affected parties.
- The implementation program that has been created does not yet have a PIC in its implementation.

Correction *(filled by organization audited):*

- Social impact management program document for 2019 which contains all issues including community participatory issues,
- For participatory evidence, the minutes of the meeting with the Village Head in Kecuruan are attached, and the recap of aspirations from the questionnaire form for each program has been determined by the PIC.

Corrective Action *(filled by organization audited):*

- The company will routinely involve the affected parties in the preparation of the program either through aspirations of questionnaires or direct meetings, as well as programs that have been prepared to have a PIC.
- The next program was coordinated with PSD staff

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

Verification 13 August 2019

The company shows some evidence of improvements in the form of:

- The community aspirations questionnaire related to the existence of PT BSS and Sustainable Garden Management which was carried out in May 2019
- Minutes of the meeting with village representatives at the District Office on 9 June 2019 attended by representatives of Betung Village, Bekambit Village, Asri Village, Sejah Village, Batu Tunau Village, Lengkang Baru Village, Lengkang Lama Village.
- Evaluation of the Social Impact management and monitoring plan for 2019-2021 which was carried out by considering the results of consultations with the Village Representative and the Results of Questionnaire responses from the community.
- The 2019-2021 Social Monitoring and Management Plan that has been completed with the PIC and the time plan for implementation.

Based on the evidence of corrections shown, root cause analysis, correction and corrective actions of non-conformity are stated to have been fulfilled.

Verified by : **Bayu Yogatama**

NCR No.	: 2019.04	Issued by	: Bayu Yogatama
Date Issued	: 24 May 2019	Time Limit	: ASA-1.4
NC Grade	: Minor	Date of Closing	:
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 (filled by auditor): CH can show the following documents:			
<ul style="list-style-type: none">• Program for dealing with negative impacts based on the SEIA report by Polito in 2010 for the period 2017-2019.• PT BSS social impact monitoring report which was held on January 12, 2019.• Which social impact management and management program is prepared based on the SIA study report in 2010 by Polito, the program for the period 2019-2020.			

However, the company has not conducted a 2-year review of the plans and programs for managing the social impacts it has had involving all affected parties (internal and external stakeholders)

Non-Conformance Description *(filled by auditor):*

There is no evidence of a 2-year review of plans and management programs for social impacts that have involved all affected parties.

Root Cause Analysis *(filled by organization audited):*
Correction *(filled by organization audited):*
Corrective Action *(filled by organization audited):*
Assessor Evaluation and Conclusion *(filled by auditor):*
Verified by :

NCR No.	2019.05	Issued by	Bayu Yogatama
Date Issued	24 May 2019	Time Limit	ASA-1.4
NC Grade	Major	Date of Closing	
Standard Ref. & Requirement	7.3.1 There shall be evidence that no new plantings have replaced primary forest, or any area required to maintain or enhance one or more High Conservation Values (HCVs), since November 2005. New plantings shall be planned and managed to best ensure the HCVs identified are maintained and/or enhanced (see Criterion 5.2).		
Evidence observed <i>(filled by auditor):</i> PT BSS has reported LUCA on August 28, 2015 to RSPO, but until the ASA 1.3 audit activity the company has not been able to show the concept note that has been approved by the RSPO. Based on the email from the Head of Sustainability on May 9, 2019 to the RSPO secretariat, it was stated from the results of the meeting between the SDP and the RSPO secretariat that the SDP was given 1 year for all nonconformities in the indicator 7.3.1. therefore the discrepancies in indicator 7.3.1 are given time to ASA-1.4			
Non-Conformance Description <i>(filled by auditor):</i> The company has not been able to show that the RACP concept note has been approved by the RSPO.			
Root Cause Analysis <i>(filled by organization audited):</i>			
Correction <i>(filled by organization audited):</i>			
Corrective Action <i>(filled by organization audited):</i>			
Assessor Evaluation and Conclusion <i>(filled by auditor):</i>			
Verified by :			

NCR No.	: 2019.06	Issued by	: Moh Arif Yusni				
Date Issued	: 24 May 2019	Time Limit	: 22 August 2019				
NC Grade	: Major	Date of Closing	: 20 Augusts 2019				
Standard Ref. & Requirement	COC 5.6.1 The supplying site shall ensure that the following minimum information for RSP0 certified products is made available in document form: The name and address of the buyer						
Evidence observed (filled by auditor): The certificate holder cannot show information related to the name and buyer of RSP0 certified products including: - Evidence / Delivery Order / Delivery Note regarding certified products - Delivery Destination (buyer's name) certified product - Volume and delivery of certified products - SCCS model used - Buyer's name and address - Documentation of product delivery							
Non-Conformance Description (filled by auditor): The certificate holder cannot show information related to the name and certified product buyer							
Root Cause Analysis (filled by organization audited): The unit management of PT BSS do not have update related selling data due to the data are still in process in marketing department jakarta							
Correction (filled by organization audited): Presented the selling documents and coordinate with marketing department related selling data							
Corrective Action (filled by organization audited): Operational unit will coordinate with marketing department to receive latest data update regarding selling product.							
Assessor Evaluation and Conclusion (filled by auditor): Verification 16 August 2019 The certificate holder can presented the corrective evidence in the form of sales data describing the Delivery Order / Delivery Note of the certified product; Delivery Destination (buyer's name) certified product; Volume and delivery of certified product shipments; SCCS model used; The name and address of the buyer as stated in the following table - CSPO							
Months	CSPO Sales (Kg)				Explanation		
	RSP0 Certified (IP)	RSP0 Certified (MB)	NON Certified	TOTAL	Buyer	DO Number	SCCS Model
May 2018	997,490			997,490	PT. Golden Hope Nusantara	0397/00299/05/18/L-BSS-MKS	RSP0 IP
	996,340			996,340	PT. Golden Hope Nusantara	0398/00300/05/18/L-BSS-MKS	RSP0 IP
	997,710			997,710	PT. Golden Hope Nusantara	0399/00301/05/18/L-BSS-MKS	RSP0 IP
June 2018	995,430			995,430	PT. Golden Hope Nusantara	0400/00302/06/18/L-BSS-MKS	RSP0 IP

	1,495,380			1,495,380	PT. Golden Hope Nusantara	0401/00303/06/18/L-BSS-MKS	RSPO IP
July 2018	1,495,140			1,495,140	PT. Golden Hope Nusantara	0402/00304/07/18/L-BSS-MKS	RSPO IP
August 2018	1,499,440			1,499,440	PT. Golden Hope Nusantara	0404/00306/08/18/L-BSS-MKS	RSPO IP
September 2018	1,499,250			1,499,250	PT. Golden Hope Nusantara	0406/00308/09/18/L-BSS-MKS	RSPO IP
October 2018		1,492,790		1,492,790	PT. Golden Hope Nusantara	0407/00309/10/18/L-BSS-MKS	RSPO MB
		1,495,120		1,495,120	PT. Golden Hope Nusantara	0408/00310/10/18/L-BSS-MKS	RSPO MB
November 2018		1,496,840		1,496,840	PT. Golden Hope Nusantara	0409/00311/11/18/L-BSS-MKS	RSPO MB
		2,493,740		2,493,740	PT. Golden Hope Nusantara	0410/00311/11/18/L-BSS-MKS	RSPO MB
December 2018		2,496,610		2,496,610	PT. Golden Hope Nusantara	0411/00313/12/18/L-BSS-MKS	RSPO MB
		499,440		499,440	PT. Golden Hope Nusantara	0412/00314/12/18/L-BSS-MKS	RSPO MB
January 2019		1,494,660		1,494,660	PT. Golden Hope Nusantara	0413/00315/1/19/L-BSS-MKS	RSPO MB
		1,995,770		1,995,770	PT. Golden Hope Nusantara	0414/00316/1/19/L-BSS-MKS	RSPO MB
February 2019		2,000,170		2,000,170	PT. Golden Hope Nusantara	0415/00317/2/19/L-BSS-MKS	RSPO MB
		95,820		95,820	PT. Golden Hope Nusantara	0416/00318/2/19/L-BSS-MKS	RSPO MB
March 2019		2,003,130		2,003,130	PT. Golden Hope Nusantara	0417/00319/3/19/L-BSS-MKS	RSPO MB
Total	9,976,180	17,564,090	-	27,540,270			

- CSPK

Months	CSPK Sales (Kg)				Explanation		
	RSPO Certified (IP)	RSPO Certified (MB)	NON Certified	TOTAL	Buyer	DO Number	SCCS Model
May 2018	395,240			395,240	PT. Laguna Mandiri	0195/0183/5/18/L-BSS-IKS	RSPO IP
June 2018	398,760			398,760	PT. Laguna Mandiri	0197/0184/6/18/L-BSS-IKS	RSPO IP
	309,580			309,580	PT. Laguna Mandiri	0199/0187/6/18/L-BSS-IKS	RSPO IP
July 2018	301,570			301,570	PT. Laguna Mandiri	0200/0188/7/18/L-BSS-IKS	RSPO IP
August 2018	245,360			245,360	PT. Laguna Mandiri	0201/0189/8/18/L-BSS-IKS	RSPO IP
	500,550			500,550	PT. Laguna Mandiri	0202/0190/8/18/L-BSS-IKS	RSPO IP
September 2018	197,310			197,310	PT. Laguna Mandiri	0203/0191/9/18/L-BSS-IKS	RSPO IP
	197,380			197,380	PT. Laguna Mandiri	0204/0191/9/18/L-BSS-IKS	RSPO IP
October 2018		598,340		598,340	PT. SMART	0205/0192/10/18/L-BSS-IKS	RSPO MB
November 2018		600,730		600,730	PT. SMART	0207/0195/11/18/L-BSS-IKS	RSPO MB

		50,490		50,490	PT. Laguna Mandiri	0207/0195/11/18/L-BSS-IKS	RSPO MB
December 2018		796,810		796,810	PT. SMART	0209/0196/12/18/L-BSS-IKS	RSPO MB
January 2019		297,710		297,710	PT. Laguna Mandiri	0210/0196/1/19/L-BSS-IKS	RSPO MB
		301,880		301,880	PT. Ladangrumpun Suburababadi	0293/0263/1/19/L-BSS-IKS	RSPO MB
February 2019		296,760		296,760	PT. Laguna Mandiri	0212/0200/2/19/L-BSS-IKS	RSPO MB
March 2019		200,990		200,990	PT. Laguna Mandiri	0214/0202/3/19/L-BSS-IKS	RSPO MB
		496,980		496,980	PT. Laguna Mandiri	0215/0203/3/19/L-BSS-IKS	
Total	2,545,750	3,640,690	-	6,186,440			

Based on the above table, it is known that all CPO and PK certified products produced by PT BSS are sold as certified products. The details are as follows:

- Sales of 27,540.270 MT Certified CPO which is divided into 9,976.180 MT in IP and 17,564.090 in MB
- Certified PK sales of 6,186.440 MT which is divided into 2,545.750 MT IP and 3,640.690 MB.

However, based on verification at Plam Trace it is known that on August 13, 2019 there was an allocation to the CPO Credit of 26,299 MT and remove stocks for PK as much as 298.26 MT, as stated in the figure below:

Stock Transactions					
Stock Transaction ID	Date	Product	Supply Chain Model	Transaction Type	Volume
ST-TR-be57ed32-51bc	13-08-2019	CSPO	Mass Balance	Credit Allocation	26,299
ST-TR-6cf2a666-f793	13-08-2019	CSPK	Mass Balance	Remove From Certified Stock	2,398.26

**Volume in MT*

Based on the explanation above, then the nonconformity in this indicator is stated to be unfulfilled, the company needs to complete with:

- Data on the sale of certified and non-certified products in accordance with the actual basis for removing stock or allocation to credit
- Dokumentation of shipping announcement

Verifikasi 20 August 2019

Can be presented of correctove evidence in the form of documentation regarding the acceptance of FFB (certified and uncertified); CPO and PK production (certified and not) and recapitulation of CPO and PK sales in the period May 2018 - April 2019, based on the recapitulation it is known that:

- There is no CPO sale which is claimed as RSPO certified product
- There are sales of RSPO-certified PK with MB Model of 1,395.44 MT and Model IP of 743.57 MT
- Can show examples of shipping announcements and DO of RSPO certified products

Based on the corrective evidence that presented to the auditor the non conformity on this indicator has been closed

Verified by : **Moh Arif Yusni**

NCR No.	: 2019.07	Issued by	: Moh Arif Yusni			
Date Issued	: 24 May 2019	Time Limit	: 22 August 2019			
NC Grade	: Major	Date of Closing	: 20 August 2019			
Standard Ref. & Requirement	5.7.2 The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform: <ul style="list-style-type: none"> • Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures. • Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually. • Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed. • Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements. 					
Evidence observed (filled by auditor): The certificate holder cannot show evidence that all transactions of RSPO certified products are following actions in the RSPO IT Platform. This is because the company cannot show evidence regarding <ul style="list-style-type: none"> - Shipping announcement documentation - Products sold as CSPO or CSPK, can be traced (for example from positive stock or short sell) - Remove stock against products sold as conventional or other schemes - 						
Non-Conformance Description (filled by auditor): The certificate holder cannot show evidence that all transactions of RSPO certified products are following actions in the RSPO IT Platform						
Root Cause Analysis (filled by organization audited): The operational unit does not yet have the data update remove stock and shipping announcement because the data is in Marketing Jakarta and needs a process to obtain it						
Correction (filled by organization audited): Presented the selling documents, remove products and coordinate with marketing department related selling data						
Corrective Action (filled by organization audited): Operational unit will coordinate with marketing department to receive latest data update regarding selling product.						
Assessor Evaluation and Conclusion (filled by auditor): Verification 17 August 2019 Based on the table NCR 2019.06 (5.6.1, it is known that all CPO and PK certified products produced by PT BSS are sold as certified products. The details are as follows: <ul style="list-style-type: none"> - Sales of 27,540.270 MT Certified CPO which is divided into 9,976.180 MT in IP and 17,564.090 in MB - Certified PK sales of 6,186. 440 MT which is divided into 2,545.750 MT IP and 3,640.690 MB. However, based on verification at Palm Trace it is known that on August 13, 2019 there was an allocation to the CPO Credit of						

26,299 MT and remove stocks for PK as much as 298.26 MT, as stated in the figure below:

Stock Transactions

Stock Transaction ID	Date	Product	Supply Chain Model	Transaction Type	Volume
ST-TR-be57ed32-51bc	13-08-2019	CSPO	Mass Balance	Credit Allocation	26,299
ST-TR-6cf2a666-f793	13-08-2019	CSPK	Mass Balance	Remove From Certified Stock	2,398.26

*Volume in MT

Based on the explanation above, then the nonconformity in this indicator is stated to be unfulfilled, the company needs to complete with:

- Data on the sale of certified and non-certified products in accordance with the actual basis for removing stock or allocation to credit
- Documentation of shipping announcement

Verification 20 August 2019

Can be presented of corrective evidence in the form of documentation regarding the acceptance of FFB (certified and uncertified); CPO and PK production (certified and not) and recapitulation of CPO and PK sales in the period May 2018 - April 2019, based on the recapitulation it is known that:

- There is no CPO sale which is claimed as RSPO certified product
- There are sales of RSPO-certified PK with MB Model of 1,395.44 MT and Model IP of 743.57 MT
- Can show examples of shipping announcements and DO of RSPO certified products

Based on the corrective evidence that presented to the auditor the non conformity on this indicator has been closed

Verified by : **Moh Arif Yusni**

NCR No.	: 2019.08	Issued by	: Moh Arif Yusni
Date Issued	: 24 May 2019	Time Limit	: 22 August 2019
NC Grade	: Major	Date of Closing	: 20 August 2019
Standard Ref. & Requirement	: 5.9.1 The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements		
Evidence observed (filled by auditor):			
The certificate holder cannot show evidence of documenting accurate, complete, updated and accessible records / records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements including;			
<ul style="list-style-type: none">- Data reception FFB certified and non-certified- Data CPO production of certified and non-certified- PK Production Data of certified and non-certified- Sales data for certified and non-certified CPO products- Sales data for certified and non-certified PK products			
Non-Conformance Description (filled by auditor):			
The certificate holder cannot show evidence of documenting accurate, complete, updated and accessible records / records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements			

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

Data on FFB receipts and palm product production are available, but the operational unit does not have sales data which needs to be processed by Marketing Jakarta

Correction *(filled by organization audited):*

Presented the documents related

- Data reception FFB certified and non-certified
- Data CPO production of certified and non-certified
- PK Production Data of certified and non-certified
- Sales data for certified and non-certified CPO products
- Sales data for certified and non-certified PK products

Corrective Action *(filled by organization audited):*

The operational unit will routinely recap the receipt of certified / non-certified FFBs and certificate / non-production by the clerk of production and checking by the Head of Section, as well as coordinating with the Marketing Team to update sales data

Assessor Evaluation and Conclusion *(filled by auditor):*
Verification 17 August 2019

The certificate holder can presented the corrective evidence:

- Data reception FFB certified and non-certified
- Data CPO production of certified and non-certified
- PK Production Data of certified and non-certified
- Sales data for certified and non-certified CPO products
- Sales data for certified and non-certified PK products

As described in the table below:

1. FFB Received and CPO

Months	FFB RECEIVE (Kg)		CPO PRODUCED			CPO Sales			
	RSPO Certified	NON RSPO Certified	RSPO Certified (IP)	RSPO Certified (MB)	NON Certified	RSPO Certified (IP)	RSPO Certified (MB)	NON Certified	TOTAL
May 2018	12,316,490		2,487,979		-	997,490			997,490
						996,340			996,340
						997,710			997,710
June 2018	11,504,300		2,225,054		-	995,430			995,430
						1,495,380			1,495,380
July 2018	13,032,380		2,434,204		-	1,495,140			1,495,140
August 2018	12,394,470		2,698,305		-	1,499,440			1,499,440
September 2018	13,880,820	41,033	2,957,160		8,945	1,499,250			1,499,250
October 2018	14,854,130	792,391		3,457,632	179,873		1,492,790		1,492,790
							1,495,120		1,495,120
November 2018	12,288,840	1,539,084		2,750,896	339,830		1,496,840		1,496,840
							2,493,740		2,493,740

December 2018	13,425,080	1,841,724		2,851,376	392,656		2,496,610		2,496,610
							499,440		499,440
January 2019	12,151,170	1,616,167		2,805,055	360,405		1,494,660		1,494,660
							1,995,770		1,995,770
February 2019	9,964,400	1,267,361		2,259,687	288,958		2,000,170		2,000,170
							95,820		95,820
March 2019	11,551,310	1,652,205		2,636,149	373,233		2,003,130		2,003,130
April 2019	11,072,340	1,509,696		2,356,710	335,153				-
TOTAL	148,435,730	10,259,661	12,802,702	19,117,506	2,279,052	9,976,180	17,564,090	-	27,540,270

2. PK

Year	Months	PK Produced (Kg)			PK Sales (Kg)			
		RSPO Certified (IP)	RSPO Certified (MB)	NON Certified	RSPO Certified (IP)	RSPO Certified (MB)	NON Certified	TOTAL
2018 & 2019	May 2018	509,408		-	395,240			395,240
	June 2018	507,595		-	398,760			398,760
					309,580			309,580
	July 2018	635,523		-	301,570			301,570
	August 2018	603,625		-	245,360			245,360
					500,550			500,550
	September 2018	644,816		1,949	197,310			197,310
					197,380			197,380
	October 2018		668,415	34,786		598,340		598,340
	November 2018		563,898	69,721		600,730		600,730
						50,490		50,490
	December 2018		570,516	78,642		796,810		796,810
	January 2019		580,815	74,667		297,710		297,710
						301,880		301,880
	February 2019		446,483	57,031		296,760		296,760

	March 2019		539,586	76,497		200,990		200,990
						496,980		496,980
	April 2019		466,635	66,427				-
TOTAL		2,900,967	3,836,349	459,719	2,545,750	3,640,690	-	6,186,440

Based on the table above, it is known that all CPO and PK certified products produced by PT BSS are sold as certified products. The details are as follows:

- Sales of 27,540.270 MT Certified CPO which is divided into 9,976.180 MT in IP and 17,564.090 in MB
- Certified PK sales of 6,186.440 MT which is divided into 2,545.750 MT IP and 3,640.690 MB.

However, based on verification at Plam Trace it is known that on August 13, 2019 there was an allocation to the CPO Credit of 26,299 MT and remove stocks for PK as much as 298.26 MT, as stated in the figure below:

Stock Transactions					
Stock Transaction ID	Date	Product	Supply Chain Model	Transaction Type	Volume
ST-TR-be57ed32-51bc	13-08-2019	CSPO	Mass Balance	Credit Allocation	26,299
ST-TR-6cf2a666-f793	13-08-2019	CSPK	Mass Balance	Remove From Certified Stock	2,398.26

**Volume in MT*

Based on the explanation above, then the nonconformity in this indicator is stated to be unfulfilled, the company needs to complete with:

- Data on the sale of certified and non-certified products in accordance with the actual basis for removing stock or allocation to credit
- Documentation of shipping announcement

Verification 20 August 2019

Can be presented of corrective evidence in the form of documentation regarding the acceptance of FFB (certified and uncertified); CPO and PK production (certified and not) and recapitulation of CPO and PK sales in the period May 2018 - April 2019, based on the recapitulation it is known that:

- There is no CPO sale which is claimed as RSPO certified product
- There are sales of RSPO-certified PK with MB Model of 1,395.44 MT and Model IP of 743.57 MT
- Can show examples of shipping announcements and DO of RSPO certified products

Based on the corrective evidence that presented to the auditor the non conformity on this indicator has been closed

Verified by : **Moh Arif Yusni**

NCR No.	: 2019.09	Issued by	: Moh Arif Yusni
Date Issued	: 24 May 2019	Time Limit	: 22 August 2019
NC Grade	: Major	Date of Closing	: 21 August 2019

Standard Ref. & Requirement	5.8.2 Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed
Evidence observed (filled by auditor): The certificate holder can show the realization of SCCS training activities to all personnel related to SCCS, for example on 06 and 10 October 2018. However, the results of document studies and interviews show that training material has not been specific to explaining the tasks that apply at PT BSS, for example about : <ul style="list-style-type: none"> - Receiving FFB from certified and non-certified PT BSS areas - Documentation of certified and non-certified production 	
Non-Conformance Description (filled by auditor): Training material has not been specific to explaining the duties of things that apply at PT BSS	
Root Cause Analysis (filled by organization audited): The operational side is not aware of any areas outside the scope of certification and also the block identification has not been done, so there is no procedure that regulates the acceptance of non-certified FFB from the area of PT. BSS	
Correction (filled by organization audited): The company has identified areas outside the scope of certification and also SOPs for receiving FFB, and has conducted socialization for new SOPs to mill or estate personnel	
Corrective Action (filled by organization audited): The company will implement the procedure for accepting non-certified FFB PT. BSS in accordance with the new SOP that has been socialized to all personnel involved.	
Assessor Evaluation and Conclusion (filled by auditor): Verification 20 August 2019 Can be presented of corrective evidence related documents of training activities related to SCCS, procedures for receiving non-certified FFB, and identification of areas outside the scope of certification for plantation and mill personnel on 19 August 2019 Based on the corrective evidence that presented to the auditor the non conformity on this indicator has been closed	
Verified by	Moh Arif Yusni

NCR No.	: 2019.010	Issued by	: Moh Arif Yusni
Date Issued	: 24 May 2019	Time Limit	: 22 August 2019
NC Grade	: Major	Date of Closing	: 20 August 2019
Standard Ref. & Requirement	: E.2.2 The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).		
Evidence observed (filled by auditor):			
Gunung Aru Factory has been registered in the RSPO IT Platform, but the Gunung Aru Factory has not been able to show evidence of reporting to the RSPO IT Platform related to RSPO certified product transactions, for example			
- Documentation shipping announcement			
- Remove stock of the product that is sold as conventional or other schemes			
- Sales data for certified and non-certified CPO products			
- Sales data for certified and non-certified PK products			

Non-Conformance Description (filled by auditor):

Gunung Aru Factory has not been able to show evidence that has been reported to the RSPO IT Platform related to product transactions

Root Cause Analysis (filled by organization audited):

The operational unit does not yet have the data update remove stock and shipping announcement because the data is in Marketing Jakarta and needs a process to obtain it

Correction (filled by organization audited):

Presented the selling documents, remove products and coordinate with marketing department related selling data

Corrective Action (filled by organization audited):

Operational unit will coordinate with marketing department to receive latest data update regarding selling product.

Assessor Evaluation and Conclusion (filled by auditor):

Verification 17 August 2019

Based on the table NCR 2019.06 (5.6.1, it is known that all CPO and PK certified products produced by PT BSS are sold as certified products. The details are as follows:

- Sales of 27,540.270 MT Certified CPO which is divided into 9,976.180 MT in IP and 17,564.090 in MB
- Certified PK sales of 6,186. 440 MT which is divided into 2,545.750 MT IP and 3,640.690 MB.

However, based on verification at Plam Trace it is known that on August 13, 2019 there was an allocation to the CPO Credit of 26,299 MT and remove stocks for PK as much as 298.26 MT, as stated in the figure below:

Stock Transactions

Stock Transaction ID	Date	Product	Supply Chain Model	Transaction Type	Volume
ST-TR-be57ed32-51bc	13-08-2019	CSPO	Mass Balance	Credit Allocation	26,299
ST-TR-6cf2a666-f793	13-08-2019	CSPK	Mass Balance	Remove From Certified Stock	2,398.26

*Volume in MT

Based on the explanation above, then the nonconformity in this indicator is stated to be unfulfilled, the company needs to complete with:

- Data on the sale of certified and non-certified products in accordance with the actual basis for removing stock or allocation to credit
- Documentation of shipping announcement

Verifikasi 20 August 2019

Can be presented of correctove evidence in the form of documentation regarding the acceptance of FFB (certified and uncertified); CPO and PK production (certified and not) and recapitulation of CPO and PK sales in the period May 2018 - April 2019, based on the recapitulation it is known that:

- There is no CPO sale which is claimed as RSPO certified product
- There are sales of RSPO-certified PK with MB Model of 1,395.44 MT and Model IP of 743.57 MT
- Can show examples of shipping announcements and DO of RSPO certified products

Based on the corrective evidence that presented to the auditor the non conformity on this indicator has been closed

Verified by	:	Moh Arif Yusni
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NCR No.	:	2019.011	Issued by	:	Moh Arif Yusni
Date Issued	:	24 May 2019	Time Limit	:	22 August 2019
NC Grade	:	Major	Date of Closing	:	20 August 2019
Standard Ref. & Requirement	:	E.3.2 The site shall have documented procedures for receiving and processing certified and non-certified FFBs.			

Evidence observed (filled by auditor):

Based on the results of the document review, and interviews with the management, it is known that there is an area of \pm 761.41 Ha of area which is not included in the scope of certification and which is managed under each estate. The results of the field visit and document verification revealed that some of these areas were located in the same block as the nucleus estate (certification area).

The company has a SCCS (SCCS-std / RSPO / PSQM / 03) procedure that regulates the receipt of FFB. However, in the procedure, it is only related to the mechanism for receiving certified products and non-certificates from suppliers. The SCCS procedure that is owned by the company has not explained about

- Mechanisms and implementation in the field are related to the separation of RSPO-certified and non-certified FFB, especially in blocks whose area is divided between certified or non-certified areas
- Method of recording / documenting receipt of certified and non-certified FFB on Gunung Aru Factory

Non-Conformance Description (filled by auditor):

Not yet able to show the procedure for receiving certified and non-certified FFB.

Root Cause Analysis (filled by organization audited):

There are no clear procedures related to receiving FFB from areas that have not been certified

Correction (filled by organization audited):

Making procedures for recording certified / uncertified FFB related to the 765.93 ha area of PT. BSS

Corrective Action (filled by organization audited):

Updated and evaluated the SOP regularly

Assessor Evaluation and Conclusion (filled by auditor):

Verification 17 August, 2019

The company can show the identification of areas included in the scope of certification as follows:

- The area includes a proposed additional HGU of 240 hectares
- The area of enclave in the HGU is 528.84 Ha

Related to the FFB Separation the method that used is an estimate based on the results of the taxation and identification of each field.

Based on the explanation above, then the nonconformity in this indicator is stated to be unfulfilled, because there is no mechanism to ensure the separation of FFB physically and in real time according to production in the field.

Verification 20 August, 2019

Proof of improvement can be shown in the form of SCCS SOP Revision that explains the procedure for recording certified and uncertified FFB areas which is briefly explained as follows:

1. Based on the identification results, a marking is carried out using a boundary marking that provides information that the palm oil line is an area outside the scope of certification.
2. The production clerk performs a physical calculation of the actual length of the harvest for FFB within the boundary stakes as non-certified FFB.
3. In the FFB Delivery letter (SPB) information about the number of FFB certified and non-certificate must be clearly recorded, both separate or joined transportation.

Based on the corrective evidence that presented to the auditor the non conformity on this indicator has been closed and will be verified again at the next assessment.

Verified by : **Moh Arif Yusni**

NCR No.	: 2019.012	Issued by	: Moh Arif Yusni
Date Issued	: 24 May 2019	Time Limit	: 22 August 2019
NC Grade	: Major	Date of Closing	: 20 August 2019
Standard Ref. & Requirement	: E.5.1 d. The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis. e. All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. f. The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three months. However, a site is allowed to sell short.(ie product can be sold before it is in stock.)		
Evidence observed (filled by auditor): Based on the results of a document verifications, it is known that: - Facilities / Mill have not been able to show evidence of recording and balancing all RSPO certified FFB and RSPO certified CPO shipments on a 3 (three) monthly basis - Facilities / Mill have not been able to show evidence that all CPO and Palm kernel that are sold as certified products are RSPO certified CPO and PK. - Facilities / Mill have not been able to show evidence that the sale of certified products must come from positive stock (Verification on palm trace for the May 2018 - April 2019 period contained CPO and PK sales data, but it is not clear whether CPO / PK sold from certified sources, non-certificates, or a combination of both). Non-Conformance Description (filled by auditor): Gunung Aru Factory has not been able to show evidence / documentation of receipt of certified and non-certified FFB, especially those originating from the PT BSS area which is not included in the scope of certification.			
Correction (filled by organization audited): Presented the documents related - Data reception FFB certified and non-certified - Data CPO production of certified and non-certified - PK Production Data of certified and non-certified - Sales data for certified and non-certified CPO products - Sales data for certified and non-certified PK products			
Corrective Action (filled by organization audited):			

The operational unit will routinely recap the receipt of certified / non-certified FFBs and certificate / non-production by the clerk of production and checking by the Head of Section, as well as coordinating with the Marketing Team to update sales data

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

Verification 17 August 2019

The certificate holder can presented the corrective evidence:

- Data reception FFB certified and non-certified
- Data CPO production of certified and non-certified
- PK Production Data of certified and non-certified
- Sales data for certified and non-certified CPO products
- Sales data for certified and non-certified PK products

As described in the table below:

1. FFB Received

Months	FFB RECEIVE (Kg)	
	RSPO Certified	NON Certified
May 2018	12,316,490	
June 2018	11,504,300	
July 2018	13,032,380	
August 2018	12,394,470	
September 2018	13,880,820	41,033
October 2018	14,854,130	792,391
November 2018	12,288,840	1,539,084
December 2018	13,425,080	1,841,724
January 2019	12,151,170	1,616,167
February 2019	9,964,400	1,267,361
March 2019	11,551,310	1,652,205
April 2019	11,072,340	1,509,696
TOTAL	148,435,730	10,259,661

2. CPO Produced and Despatch

Months	CPO PRODUCED (Kg)			CPO Dispatch (Kg)			
	RSPO Certified (IP)	RSPO Certified (MB)	NON Certified	RSPO Certified (IP)	RSPO Certified (MB)	NON Certified	TOTAL
May 2018	2,487,979		-	997,490			997,490
				996,340			996,340
				997,710			997,710
June 2018	2,225,054		-	995,430			995,430
				1,495,380			1,495,380
July 2018	2,434,204		-	1,495,140			1,495,140

August 2018	2,698,305		-	1,499,440			1,499,440
September 2018	2,957,160		8,945	1,499,250			1,499,250
October 2018	3,457,632	179,873			1,492,790		1,492,790
					1,495,120		1,495,120
November 2018	2,750,896	339,830			1,496,840		1,496,840
					2,493,740		2,493,740
December 2018	2,851,376	392,656			2,496,610		2,496,610
					499,440		499,440
January 2019	2,805,055	360,405			1,494,660		1,494,660
					1,995,770		1,995,770
February 2019	2,259,687	288,958			2,000,170		2,000,170
					95,820		95,820
March 2019	2,636,149	373,233			2,003,130		2,003,130
April 2019	2,356,710	335,153					-
TOTAL	12,802,702	19,117,506	2,279,052	9,976,180	17,564,090	-	27,540,270

1. PK Produced and Despatch

Months	PK Produced (Kg)			PK Dispatch (Kg)			
	RSPO Certified (IP)	RSPO Certified (MB)	NON Certified	RSPO Certified (IP)	RSPO Certified (MB)	NON Certified	TOTAL
May 2018	509,408		-	395,240			395,240
June 2018	507,595			398,760			398,760
				309,580			309,580
July 2018	635,523		-	301,570			301,570
August 2018	603,625		-	245,360			245,360
				500,550			500,550
September 2018	644,816		1,949	197,310			197,310
				197,380			197,380
October 2018		668,415	34,786		598,340		598,340
November 2018		563,898	69,721		600,730		600,730
					50,490		50,490
December 2018		570,516	78,642		796,810		796,810
January 2019		580,815	74,667		297,710		297,710

					301,880		301,880
February 2019		446,483	57,031		296,760		296,760
March 2019		539,586	76,497		200,990		200,990
					496,980		496,980
April 2019		466,635	66,427				-
TOTAL	2,900,967	3,836,349	459,719	2,545,750	3,640,690	-	6,186,440

Based on the table above, it is known that all CPO and PK certified products produced by PT BSS are sold as certified products. The details are as follows:

- Sales of 27,540.270 MT Certified CPO which is divided into 9,976.180 MT in IP and 17,564.090 in MB
- Certified PK sales of 6,186.440 MT which is divided into 2,545.750 MT IP and 3,640.690 MB.

However, based on verification at Plam Trace it is known that on August 13, 2019 there was an allocation to the CPO Credit of 26,299 MT and remove stocks for PK as much as 298.26 MT, as stated in the figure below:

Stock Transactions					
Stock Transaction ID	Date	Product	Supply Chain Model	Transaction Type	Volume
ST-TR-be57ed32-51bc	13-08-2019	CSPO	Mass Balance	Credit Allocation	26,299
ST-TR-6cf2a666-f793	13-08-2019	CSPK	Mass Balance	Remove From Certified Stock	2,398.26

**Volume in MT*

Based on the explanation above, then the nonconformity in this indicator is stated to be unfulfilled, the company needs to complete with:

- Data on the sale of certified and non-certified products in accordance with the actual basis for removing stock or allocation to credit
- Documentation of shipping announcement

Verification 20 August 2019

Can be presented of corrective evidence in the form of documentation regarding the acceptance of FFB (certified and uncertified); CPO and PK production (certified and not) and recapitulation of CPO and PK sales in the period May 2018 - April 2019, based on the recapitulation it is known that:

- There is no CPO sale which is claimed as RSPO certified product
- There are sales of RSPO-certified PK with MB Model of 1,395.44 MT and Model IP of 743.57 MT
- Can show examples of shipping announcements and DO of RSPO certified products

Based on the corrective evidence that presented to the auditor the non conformity on this indicator has been closed

Verified by : **Moh Arif Yusni**

NCR No.	: 2019.013	Issued by	: Moh Arif Yusni
Date Issued	: 24 May 2019	Time Limit	: 22 August 2019

NC Grade	:	Major	Date of Closing	:	17 August 2019
Standard Ref. & Requirement	:	RSPO Certification System – 4.5.3 Time-bound plan: A time-bound plan for certifying all its management units and/or entities, including the units where the organization has management control and no or minor shareholding, is submitted to the CB during the initial certification audit. The time-bound plan should contain a current list of all estates and mills.			
Evidence observed (filled by auditor): Based on the results of document studies, interviews with management are known that there is an area in PT BSS that is not included in the scope of certification which is ± 761.41 Ha. Related to this, the company has not been able to show a Time Bound Plan for areas that are not included in the scope of certification					
Non-Conformance Description (filled by auditor): cannot be shown TBP for areas not included in the scope of certification					
Root Cause Analysis (filled by organization audited): TBP for area s not included in the scope of certification is not available due to formerly all area of PT BSS is RSPO certified area. during audit ASA 1.3 its known if the area that still in progress of land title are not covering under Plantation business permit so the area excluded from certified area					
Correction (filled by organization audited): The TBP revision included in the PT.BSS area outside the IUP					
Corrective Action (filled by organization audited): the preparation of TBP by PSQM Jakarta will cover areas not yet certified in PT. BSS and coordinate with PSD staff for updates.					
Assessor Evaluation and Conclusion (filled by auditor): Verification 17 August 2019 Sime Darby Bhd was able to show a Time Bound Plan approved by the Head of Sustainability Indonesia, where for areas that do not yet have a HGU of ± 761.41 Ha planned to be certified in 2020, Based on the corrective evidence that presented to the auditor the non conformity on this indicator has been closed					
Verified by	:	Moh Arif Yusni			

3.5.3. Opportunity for Improvement

No	Ref. Std.	Description
1	Minor 2.1.4	Further identification of regulations issued in 2018.
2	Minor 4.7.5	Complete warehouse with OHS information.
3	Major 5.3.2	<ul style="list-style-type: none"> • Ensure submission of hazardous waste from a temporary place on schedule, • Ensuring the legality of medical waste storage.
4	Minor 5.3.3	Ensure management of fertilizer packages.
5	Minor 6.2.3	List of stakeholders that includes the previous landowner (Observation).
6	Major 6.5.2	Ensure the working period of PKWT/ contract workers is in accordance with regulations.

3.5.4. Noteworthy Positive Components

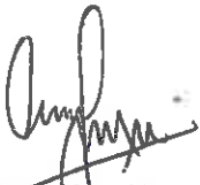

No	Description
1	Good motivation from the company to implement and fulfill RSPO standards.
2	Has received ISPO certificate (No SGS-ID-ISPO-0008 Certificate)
3	Obtained the Proper Blue Award for the 2017-2018 Period

3.6 Summary of Arising Issues from Public and Auditor Verification

Public Issues (Institution/ NGO/Community)	Auditor Responses
<p>Local Contractor for Infrastructure (CV. Dedy Setia Kawan)</p> <p>The certificate holder continues to improve business and empower local communities by working with local contractors, for example in making culverts and supply of building materials. Work agreements are made based on agreements between the two parties and payments are made on time in accordance with the contents of the agreement. Regarding the OHS aspect, the provision of PPE is provided by the contractor. The company provides training, socialization and supervision while in the field. Regarding the fulfillment of labor social security, the work agreement has explained that contractor workers are given social security which is the responsibility of the contractor. However, based on the results of the interview, it was stated that 10 workers were still in the stage of social security registration.</p>	<p>The 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. Described in detail in criteria 6.10 and 6.11. Related to social security explained in criteria 4.7.</p>
<p>Local Contractor for Transport Kernel (PT . Cindra Kasih)</p> <p>The certificate holder continues to improve business and empower local communities by working with local contractors, for example in the transportation of palm oil products (kernels). Work agreements are made based on agreements between the two parties and payments are made on time in accordance with the contents of the agreement. Regarding the OHS aspect, the provision of PPE is provided by the contractor. The company provides training, socialization and supervision while in the field. Regarding the fulfillment of labor social security, the work agreement has explained that contractor workers are given social security which is the responsibility of the contractor. However, based on the results of interviews, it was stated that 15 workers had been registered and there were still 8 workers who had not been registered with the social security program.</p>	<p>The 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. Described in detail in criteria 6.10 and 6.11. Related to social security explained in criteria 4.7.</p>
<p>Independent Workers Union Gunung Aru Estate</p> <ul style="list-style-type: none"> • There is no negative issues such as discrimination, the use of labor under 18 years, sexual abuse issues and others. • Providing wages and overtime in compliance with applicable regulations. • All employees have been included in the program BPJS employment and health. • The Company has conducted periodic health checks to workers with high risk. 	<ul style="list-style-type: none"> • Has been described in criterion 6.5. • Has been described in indicator 6.5.1 • The company has paid labor social insurance and labor health insurance for all workers as written in indicator 4.7.6. • Has been described in indicator 4.6.11

Public Issues (Institution/ NGO/Community)	Auditor Responses
<ul style="list-style-type: none"> The Company has also provided PPE which is provided for free. 	<ul style="list-style-type: none"> Has been described in indicator 4.7.3
Employee cooperative Gunung Kemas Estate The certificate holder supports the existence of employee cooperative activities, among other forms of support, namely the transport unit for shopping for the needs of cooperatives, provision of offices / businesses and meeting places	There is no issue regarding employee cooperative.
Independent Workers Union Pantai Timur Estate <ul style="list-style-type: none"> There is no negative issues such as discrimination, the use of labor under 18 years, sexual abuse issues and others. Providing wages and overtime in compliance with applicable regulations. All employees have been included in the program BPJS employment and health. The Company has conducted periodic health checks to workers with high risk. The Company has also provided PPE which is provided for free. 	<ul style="list-style-type: none"> Has been described in criterion 6.5. Has been described in indicator 6.5.1 The company has paid labor social insurance and labor health insurance for all workers as written in indicator 4.7.6. Has been described in indicator 4.6.11 Has been described in indicator 4.7.3
Gender Committee Officials of Gunung Aru Estate and Laut Timur Estate The gender committee representatives in each division have also been determined. The program has been written and implemented such as the socialization of sexual harassment and its mechanism. Until now there has been no harassment of female employees or violations of reproductive rights in the company's operational area.	The results of interviews with female workers in the company's operational area, it is known that each employee already knows the gender committee, responsible personnel and procedures carried out when there is abuse and violation of women's reproductive rights in the company. Described in Criteria 6.9.
Sub District Head of Pulau Laut Timur There are no negative issues of land and social dispute. There have been Bekambit River pollution caused by the Mill on early 2018, however nowadays has been cleared. The company has made efforts to develop the surrounding community through CSR programs, development and partnership with plasma, the use of local labor and local contractors.	The results of document review and field observations have not found issues of land disputes, environmental pollution, and social issues. This has been explained in criteria 2.2, 5.3, 6.1
Village Head of Sejakah There are no negative issues, land dispute issues or environmental pollution. The company has made efforts to develop the surrounding	The results of document review and field observations have not found issues of land disputes, environmental pollution, and social issues. This has been explained in criteria 2.2, 5.3, 6.1

Public Issues (Institution/ NGO/Community)	Auditor Responses
<p>community through CSR programs, development and partnership with plasma, the use of local labor and local contractors.</p> <p>However the company need to improve the participation on CSR program.</p>	
<p>Cooperative Officials of KUD Bersama Sejakah Makmur (scheme smallholder)</p> <p>The development and maintenance of smallholdings has been done well. Nowadays the oil palm still in immature stage, so there is no payment to the smallholder. There is no negative issues.</p>	<p>There is no negative issue related scheme smallholder. Described in Criteria 6.10.</p>
<p>Previous Land Owner on Sejakah Village</p> <p>The land compensation process has been carried out with a negotiation process, good administration, involving witnesses and mediation village head and sub-district head.</p>	<p>The company has shown land compensation documentary evidence carried out referring to the concept of FPIC. Described in detail in criteria 6.4</p>

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY
4.1	Formal Sign-off of Assessment Findings
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;"> <p>PT Bersama Sejahtera Sakti Management Representative</p>  <p><u>Alagendran Maniam</u> 20 August 2019</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><u>Moh Arif Yusni</u> 20 August 2019</p> </div> </div>

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

No	Institution/NGO/Community	Address	Phone/Email	Form of Communication	Date of Contact	Response	
						Yes	No
1	Sub District Head of Pulau Laut Timur	Kotabaru Regency	-	Direct interview	21 May 2019	✓	
2	Village Head of Sejakah	Sub District of Pulau Laut Timur, Kotabaru Regency	-	Direct interview	22 May 2019	✓	
3	Previous land owner on Sejakah Village	Sub District of Pulau Laut Timur, Kotabaru Regency	-	Direct interview	22 May 2019	✓	
4	Cooperative Officials of KUD Bersama Sejakah Makmur (scheme smallholder)	Sub District of Pulau Laut Timur, Kotabaru Regency	-	Direct interview	22 May 2019	✓	
5	Local Contractor for Kernel Transport (PT. Cindra Kasih)	District of Kotabaru	-	Direct interview	21 May 2019	✓	-
6	Local Contractor for Infrastructure (CV. Dedy Setia Kawan)	District of Kotabaru	-	Direct interview	21 May 2019	✓	-
7	Independent Workers Union Gunung Aru Estate	PT Bersama Sejahtera Sakti, District of Kotabaru	-	Direct interview	21 May 2019	✓	-
8	Employee cooperative Gunung Kemas Estate	PT Bersama Sejahtera Sakti, District of Kotabaru	-	Direct interview	21 May 2019	✓	-
9	Independent Workers Union Pantai Timur Estate	PT Bersama Sejahtera Sakti, District of Kotabaru	-	Direct interview	22 May 2019	✓	-
10	Gender Committee Officials of Gunung Aru Estate and Laut Timur Estate	PT Bersama Sejahtera Sakti, District of Kotabaru	-	Direct interview	22 May 2019	✓	-
11	Sawit Watch	Jakarta, Indonesia	info@sawitwatch.or.id	Questionnaire by email	13 May 2019	-	✓
12	WWF	Jakarta, Indonesia	supporter-service@wwf.or.id	Questionnaire by email	13 May 2019	-	✓
13	Walhi	Jakarta, Indonesia	informasi@walhi.or.id	Questionnaire by email	13 May 2019	-	✓
14	AMAN	Jakarta, Indonesia	rumahaman@cbn.net.id	Questionnaire by email	13 May 2019	-	✓
15	Gunung Aru Factory - 2 security - 1 weighbridge operator - 4 FFB grader - 2 sterilizer operator - 4 worker at prees, kernel, clarification station - 1 operator at engine room - 3 boilerman. - 2 store worker - 3 workshop workers - 2 weighbridge operator - 1 operator WTP - 1 operator WWTP	PT Bersama Sejahtera Sakti, District of Kotabaru	-	Field observation and direct interview	21 May 2019	✓	-
16	Gunung Aru Estate	PT Bersama Sejahtera	-	Field observation	23 May 2019	✓	-

	<ul style="list-style-type: none"> - 1 store keeper - 2 EFB application workers - 1 Safety officer - 1 operator Land Application - 1 female foreman and 8 female herbicide applicators - 2 female foreman and 8 female fertilizers - 1 female worker BSS House - 1 housing occupant 	Sakti, District of Kotabaru		and direct interview			
17	Gunung Kemas Estate <ul style="list-style-type: none"> - 3 harvester - 10 spraying worker - 8 fertilization worker - 15 EFB mulching applicator - 1 BSS Worker - 1 Hazardous waste store worker - 1 store worker 	PT Bersama Sejahtera Sakti, District of Kotabaru	-	Field observation and direct interview	23 May 2019	✓	-
18	Laut Timur Estate <ul style="list-style-type: none"> - 1 Midwife - 2 Daycare workers - 1 operator generator house - 1 store worker - 3 operator workshop - 1 male foreman and 11 female herbicide applicators - 1 foreman and 6 female fertilizers - 1 contractor worker EFB Application - 1 foreman and 3 harvesters 	PT Bersama Sejahtera Sakti, District of Kotabaru	-	Field observation and direct interview	22 May 2019	✓	-

19	Pantai Timur Estate - 1 Midwife - 3 Daycare workers - 1 BSS Workers - 1 Safety officer - 2 store worker - 2 mechanic - 1 operator generator house - 1 foreman and 4 female fertilizers - 1 female nursery foreman and 1 female crew - 1 male foreman and 12 female contract workers manual weeding - 1 male foreman and 7 female herbicide applicators	PT Bersama Sejahtera Sakti, District of Kotabaru	-	Field observation and direct interview	21 May 2019	✓	-
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Appendix 2. Assessment Program

DATE	20 – 25 May 2019	
PROGRAM	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 20 May 2019		
05.40 – 08.35 12.20 – 13.04 13.15 – 14.30	Jakarta → Banjarmasin Banjarmasin → Kota Baru Kota Baru → PT Bersama Sejahtera Sakti	All Auditor
15.00 – 15.30	Opening meeting <ul style="list-style-type: none"> Auditee Speech (Introduction of PIC, Profile of Certified Management Unit) Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification) Documents Review <ul style="list-style-type: none"> Review of previous (Initial assessment) findings Verification of Basic Information Mill and Estate Confirmation of Time Bound Plan Review of Partial Certification 	All Auditor
Tuesday, 21 May 2019		
08.00 – 14.00	Stakeholders consultation to Sub district of Pulau Laut Timur	AFS
08.00 – 12.00	Field Observation to PANTAI TIMUR ESTATE Aspect to be verified : <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries); Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) Implementation of Occupational Health & Safety Aspect Implementation of Employment Procedure and Mechanism Aspect Observation of Workers Facilities (Housing, School, Worship Place). 	<ul style="list-style-type: none"> • MAY • BYG • MAY • BYG
12.00 – 14.00	Break	All Auditor
14.00 – 17.00	Interview with Gender Committee, Worker's Union, Worker's Cooperative (if any), Local Contractor (for Mill and Estate), Third Party Supplier Field Observation to GUNUNG ARU FACTORY Aspect to be verified : <ul style="list-style-type: none"> Supply Chain verification (FFB Receiving, Weighbridge, FFB Sorting, Processing Activity, Despatch CPO) Occupational Health & Safety Aspect (Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, POME Pond) Implementation of Employment Procedure and Mechanism Aspect 	<ul style="list-style-type: none"> • BYG • MAY • AFS
Wednesday, 22 May 2019		
09.00 – 12.00	Stakeholder consultation to affected communities surrounding the plantations and	• MAY

	previous land owner	
08.00 – 12.00	Field Observation to LAUT TIMUR ESTATE Aspect to be verified : <ul style="list-style-type: none"> • Implementation of Legal Aspect (Land Ownership, Legal Boundaries); • Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) • Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) • Implementation of Occupational Health & Safety Aspect • Implementation of Employment Procedure and Mechanism Aspect • Observation of Workers Facilities (Housing, School, Worship Place). 	<ul style="list-style-type: none"> • AFS • BYG • AFS • BYG
12.00 – 14.00	Break	All Auditor
14.00 – 17.00	<ul style="list-style-type: none"> • Verification of stakeholder consultation result and field visit. • Document review and completing audit checklist. 	All Auditor
Thursday, 23 May 2019		
08.00 – 12.00	Field Observation to GUNUNG ARU ESTATE and GUNUNG KEMASAN ESTATE Aspect to be verified : <ul style="list-style-type: none"> • Implementation of Legal Aspect (Land Ownership, Legal Boundaries); • Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) • Implementation of Environmental, Conservation/HCV and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) • Implementation of Occupational Health & Safety Aspect • Implementation of Employment Procedure and Mechanism Aspect • Observation of Workers Facilities (Housing, School, Worship Place). 	All Auditor
12.00 – 14.00	Break	All Auditor
14.00 – 17.00	<ul style="list-style-type: none"> • Verification of stakeholder consultation result and field visit. • Document review and completing audit checklist. 	All Auditor
Friday, 24 May 2019		
08.00 – 11.30	<ul style="list-style-type: none"> • Continue Field Observation to Estate; Mill and Public Consultation to Company surrounded village and community leader (if needed) • Completion of checklist and RSPO Document Review 	All Auditor
11.30 – 13.00	Break	
13.00 – 15.00	Internal discussion by auditor team preparing for Closing Meeting	All Auditor
15.30 – 16.30	Closing Meeting: <ul style="list-style-type: none"> • Presentation of audit findings (Noteworthy Positive Component, Non Conformities, OFI, Timelie of CAR's, Conclusion)/ • Comments, Responses and Questions 	All Auditor
Saturday, 25 May 2019		
05.00 – 06.40	PT Bersama Sejahtera Sakti → Kotabaru	All Auditor
07.45 – 08.30	Kotabaru → Banjarmasin	
10.30 –	Banjarmasin → Jakarta	