

Roundtable on Sustainable Palm Oil Certification R S P O

[✓] Surveillance

Name of Management : Bumi Pratama Khatulistiwa Palm Oil Mill, PT Bumi Pratama Khatulistiwa
 Organisation : Subsidiary of WILMAR INTERNATIONAL Ltd
 Plantation Name : PT Bumi Pratama Khatulistiwa : Bumi Pratama Khatulistiwa Estate
 Location : Sungai Tempayan/Mega Timur Village, Sub-District of Sungai Ambawang,
 Kubu Raya District, Kalimantan Barat Province, Indonesia
 Certificate Code : **MUTU-RSPO/100**
 Date of Certificate Issue : 18 October 2017 Date of License Issue : 18 October 2019
 Date of Certificate Expiry : 17 October 2022 Date of License Expiry : 17 October 2020

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-2	24 to 28 June 2019	Leonada (Lead Auditor), Asystasya Aishah Silalahi, Hasiholan Sihombing, Bayu Yogatama	Taufik Margani	Octo HPN Nainggolan

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-2	19 September 2019

PT Mutuagung Lestari • Raya Bogor Km 33,5 Number 19 • Cimanggis • Depok 16953 • Indonesia
 Telephone (+62) (21) 8740202 • Fax (+62) (21) 87740745/6 • Email: agri@mutucertification.com • www.mutucertification.com
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Figure 1. Location Map of PT Bumi Pratama Khatulistiwa

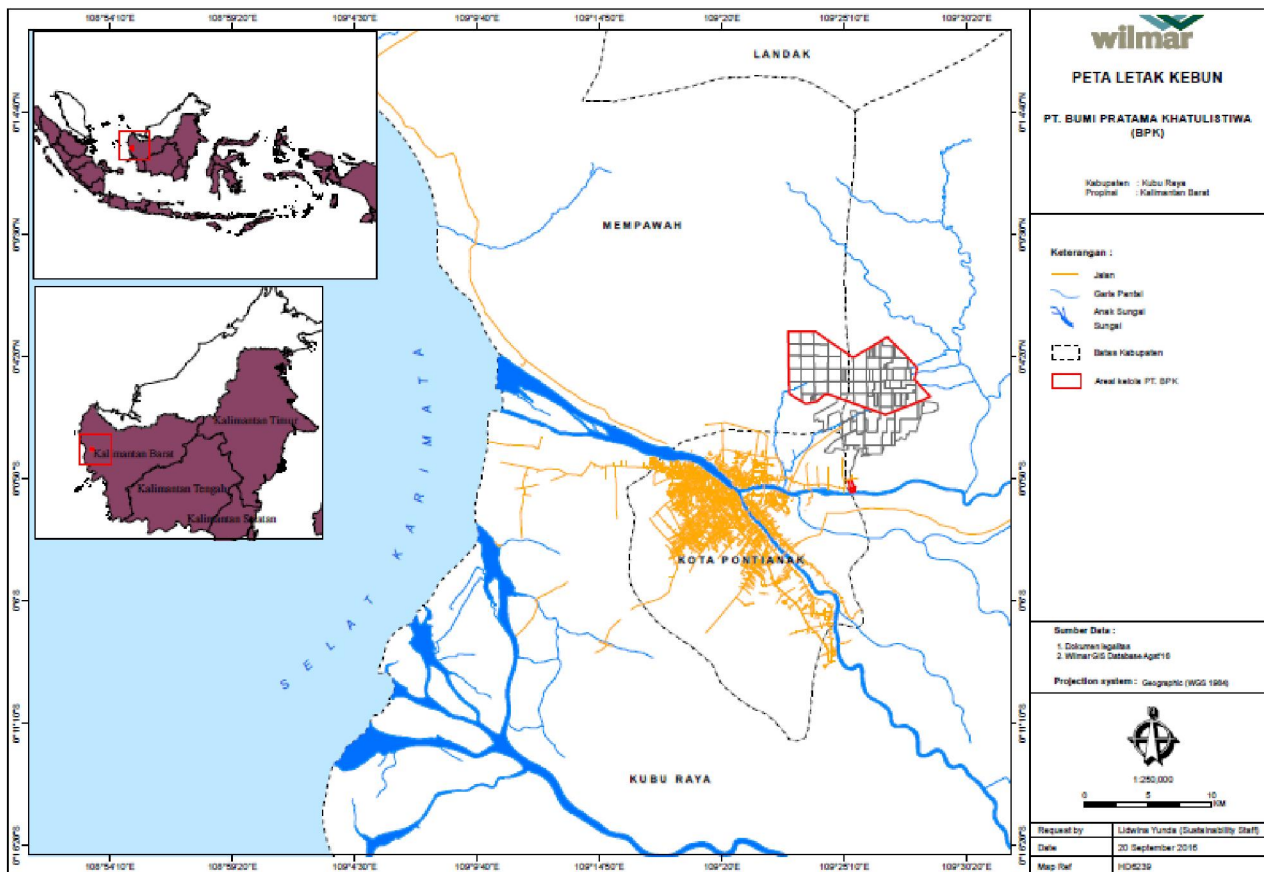
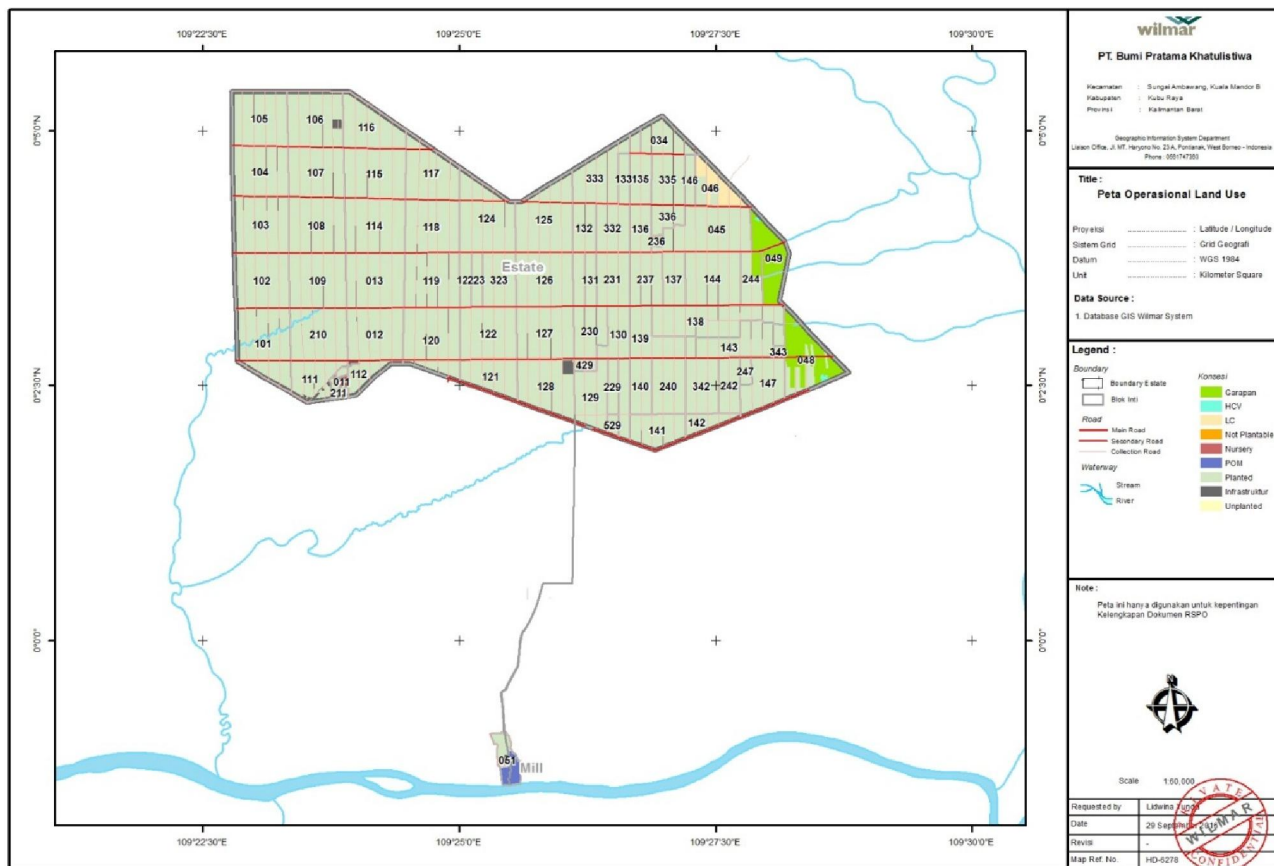


Figure 2. Operational Map of PT Bumi Pratama Khatulistiwa



Abbreviations Used

ASA	:	Annual Surveillance Assessment
BCP	:	Buluh Cawang Plantation
BPJS	:	Badan Penyelenggara Jaminan Sosial / Social Security Agency
BPK	:	Bumi Pratama Khatulistiwa
BPN	:	Badan Pertanahan Nasional (National Land Agency)
CB	:	Certification Body
CH	:	Certificate Holder
CPO	:	Crude Palm Oil
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm Oil
EFB	:	Empty Fruit Bunch
EIA	:	Environment Impact Assessment
EMU	:	Ecological Management Unit
FFA	:	Free Fatty Acid
FFB	:	Fresh Fruit Bunch
HCV	:	High Conservation Value
HGU	:	Hak Guna Usaha/ land title
HIRAC	:	Hazard Identification and Risk Assessment Control
HRR	:	Human Resource
ILO	:	International Labour Organization
IPM	:	Integrated Pest Management
KER	:	Kernel Extraction Rate
KUD	:	Koperasi Unit Desa (Village Cooperative Unit)
MSDS	:	Material Safety Data Sheet
OER	:	Oil Extraction Rate
OHS	:	Occupational Health and Safety
P2K3	:	Panitia Pembina Keselamatan dan Kesehatan Kerja/OHS Committee
PK	:	Palm Kernel
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PPE	:	Personal Protective Equipment
RSPO	:	Roundtable and Sustainable Palm Oil
SIA	:	Social Impact Assessment
SOP	:	Standard Operational Procedure

1.0	SCOPE of the CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used	<ul style="list-style-type: none">Indonesian National Interpretation of RSPO P&C 2013 by INA-NITF (Indonesian National Interpretation Task Force) July 2016, endorsed by the RSPO BoG 30th September 2016.RSPO Supply Chain Certification Standard for organizations seeking or holding certification Adopted by the RSPO BoG on 21st November 2014, revised on 14 June 2017 (Module D / E for CPO Mill)RSPO Certification System for P&C, June 2017 endorsed by the RSPO BOG 14 June 2017)	
1.2	Organisation Information		
1.2.1	Organisation name listed in the certificate	PT BUMI PRATAMA KHATULISTIWA subsidiary of Wilmar International Ltd	
1.2.2	Contact person	Perpetua George	
1.2.3	Organisation address and site address	RSPO registered company (Singapore Office): 56 Neil Road Singapore 088830 Jakarta Liaison Office: Multivison Tower Lt. 15 Jl. Kuningan Mulya Blok B9, Kuningan, Jakarta, 12980, Indonesia. Mill & Estate: Sub District of Sungai Ambawang, Kubu Raya District, Province of Kalimantan Barat, Indonesia	
1.2.4	Telephone	(62-21) 29380777	
1.2.5	Fax	(62-21) 29380115	
1.2.6	E-mail	perpetua.george@wilmar.com.sg	
1.2.7	Web page address	www.wilmar.co.id	
1.2.8	Management Representative who completed the application for certification	Perpetua George (Sustainability Coordinator)	
1.2.9	Registered as RSPO member	2-0017-05-000-00 16 August 2005	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Bumi Pratama Khatulistiwa POM and Bumi Pratama Khatulistiwa Estate	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			LatitudeLongitude
	Bumi Pratama	Sungai Tempayan/ Mega Timur Village,	S 00° 01' 19"E 109° 25' 28"

	Khatulistiwa POM	Sub District of Sungai Ambawang, Kubu Raya District, Province of Kalimantan Barat, Indonesia		
1.4.2	Location of Certification Scope of Supply Base			
	Name of Supply Base	Location	Coordinate	
			Latitude	Longitude
	Bumi Pratama Khatulistiwa Estate	Sungai Tempayan/ Mega Timur Village, Sub District of Sungai Ambawang, Kubu Raya District, Province of Kalimantan Barat, Indonesia	S 00° 02' 32"	E 109° 23' 36"
1.5	Description of Area Statement			
1.5.1	Tenure			
	• State		4,843.93	Ha
	• Community		-	Ha
1.5.2	Area Statement			
	• Total area		4,843.93	Ha
	• Mature area		4,395.11	Ha
	• Immature area		42.82	Ha
	• Mill		12.67	Ha
	• Infrastructure (Emplishment, Road, Bridge)		230.32	Ha
	• Occupation		145.17	Ha
	• Unplanted area		9.31	Ha
	• HCV		8.53	Ha
1.6	Planting Year and Cycles			
1.6.1	Age profile of planting year			
	Planting Year	Hectarage (Ha)		
		BPK ESTATE	Total	
	2000	14.19	14.19	
	2005	160.48	160.48	
	2006	25.63	25.63	
	2009	582.78	582.78	
	2010	1115.30	1115.30	
	2011	296.65	296.65	
	2012	687.58	687.58	
	2013	924.21	924.21	
	2014	334.79	334.79	
	2015	253.50	253.50	
	Sub Total Mature	4,395.11	4,395.11	
	2016	42.82	42.82	

	Subtotal Immature	42.82	42.82
	TOTAL	4,437.93	4,437.93
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
			Out put (tonnes)
			Extraction (%)
			Palm Kernel
			Out put (tonnes)
			Extraction (%)
	BPK POM	30	179,214.566
			32,293.29
			18.02
			7,182.85
			4.01
	<i>*Production data source from 12 months before assessment (June 2018 – May 2019)</i>		
1.7.2	Description of Certification Scope of Supply Base		
	Name of Estate	Total Area (Ha)	Planted Area (Ha)
			FFB (tonnes/year)
			Yield (tonnes/ha/ year)
			Supplied to Mill
			FFB (tonnes/year)
			%
	BPK ESTATE	4,843.93	4,437.93
			70,327.48
			15.85
			70,327.48
			100
	TOTAL	4,843.93	4,437.93
			70,327.48
			15.85
			70,327.48
			100
	<i>*Production data source from 12 months before assessment (June 2018 – May 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)
	BCP Estate	Subsidiary of Wilmar International Ltd	-
			1,615.73
			11,337.93
	KUD Mekar Lestari	Non certified - Associated Smallholder scheme of PT BPK	-
			1,167.02
			14,852.39
	KUD Mekar Lestari	Non certified - Associated Smallholder scheme of PT BPK	-
			431.75
			8,881.43
	KUD Mekar Lestari	Non certified - Associated Smallholder scheme of PT BPK	-
			381.21
			5,029.15
	KUD Buah Jubah	Non certified - Associated Smallholder scheme of PT BPK	-
			95.44
			1,030.54
	Kud Mentibar Cemerlang	Non certified Associated smallholder of PT BCP	-
			-
			1,425.49
	KUD Sempurna	Non certified Associated smallholder of PT BCP	-
			-
			1,882.61
	KUD Sukma	Non certified Associated smallholder of PT BCP	-
			-
			2,810.72
	KSU Sangge Mekar	Non certified Associated smallholder of PT BCP	-
			-
			101.32
	CV Bintang Borneo	Non certified Independent smallholder	-
			-
			45,365.32

PT Nusa Jaya Perkasa	Non certified Independent smallholder	-	-	247.22
PT Sumatera Unggul Makmur	Non certified Independent smallholder	-	-	84.86
PT Agro Alam Nusantara	Non certified Independent smallholder	-	-	215.08
PT Artha Unggul Lestari	Non certified Independent smallholder	-	-	11,878.13
PT Bumi Alam Sentosa	Non certified Independent smallholder	-	-	46.80
PT Putra Lirik Domas	Non certified Independent smallholder	-	-	251.12
PTRajawali Jaya Perkasa	Non certified Independent smallholder	-	-	89.83
Lesman Simbolon	Non certified Independent smallholder	-	-	7.57
PT Indy Mandiri Globality	Non certified Independent smallholder	-	-	293.07
PT Mitra Andalan Sejahtera	Non certified Independent smallholder	-	-	175.29
CV Sawit Makmur Abadi	Non certified Independent smallholder	-	-	1,103.10
PT Kapuas Jaya Abadi	Non certified Independent smallholder	-	-	232.78
CV Mitra Bintang Utama	Non certified Independent smallholder	-	-	1,465.34
TOTAL				108,807.09

**Source Production Data on 12 months before assessment (June 2018 – May 2019)*

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 (tonnes/year)	Last Year Actual Certified Volume (tonnes/year)
	FFB Processed	70,300	70,261.35
	CPO Production	13,709*	13,514.08
	Palm Kernel (PK) Production	3,164*	2,939.02

**Ext. Volume on September 2019*

1.8.2 Product selling

Type of selling product	Period last year of actual selling product
CSPO sold as RSPO certified product	13,437.75
CSPK sold as RSPO certified product	2,897.64
CSPO sold under other scheme	0
CSPK sold under other scheme	0
CSPO sold as conventional	0
CSPK sold as conventional	0

1.8.3 Estimate of Certified FFB Claim

Name of Estate(s)	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)
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	BPK ESTATE		4,843.93	4,437.93	75,000	16.90		
	TOTAL		4,843.93	4,437.93	75,000	16.90		
<i>*Projected FFB production for 18 October 2019 to 17 October 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 (%)	
	BPK POM	30	75,000	13,650	18.20	3,150	4.20	MB
<i>*Projected CSPO and CSPK production for 18 October 2019 to 17 October 2020</i>								
1.9	Other Certifications							
	ISO 9001:2008			-				
	ISO 14001: 2004			-				
	OHSAS 18001:2007			-				
	ISCC			-				
	Others							
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 Plan						
	Sapi (1 + 2)	2008	Sapi 1 & 2, Kiabau	2008	Sandakan, Sabah, Malaysia	Certified		
	Sabahmas	2008	Sabahmas	2008	Lahad Datu, Sabah, Malaysia	Certified		
	Reka Halus	2008	Reka Halus	2008	Sandakan, Sabah, Malaysia	Certified		
	Saremas 1	2008	Saremas 1, Saremas 2 (Div D), Suai	2008	Miri Serawak, Malaysia	Certified		
	Saremas 2	2008	Saremas 2 (exclude Div D), Kaminsky, Segarmas	2008	Miri Serawak, Malaysia	Certified		
	Terusan (1 + 2)	2009	Terusan 1 & 2, Rumidi	2009	Sandakan, Sabah, Malaysia	Certified		
	Ribubonus	2009	Ribubonus	2009	Sandakan, Sabah, Malaysia	Certified		
	PT Perkebunan Milano	2009	Sei Daun, Batang Saponggol, Marbau	2009	North Sumatra	Certified		
	PT Mustika Sembuluh (POM 1 & POM 2)	2009	Mustika Sembuluh 1, Mustika Sembuluh 2, Mustika Sembuluh 3, KUD Bitu Maju Bersama	2010	Central Kalimantan	Certified		
	PT Kencana Sawit Indonesia	2010	Kencana Sawit Indonesia, Koperasi Swamata	2010	West Sumatra.	Certified		

PT. Kerry Sawit Indonesia (POM 1 and POM 2)	2010	Kerry Sawit Indonesia 1, Kerry Sawit Indonesia 2, Kerry Sawit Indonesia 3	2011	Central Kalimantan	Certified
		KUD Sejahtera Bersama, KUD Kosudra, KUD Tabiku Makmur, KUD Karya Bersama	2020	Central Kalimantan	-
PT. Tania Selatan	2010	Burnai Barat, Burnai Timur	2010	South Sumatra	Certified
		KUD Bumi Jaya, KUD PUMA, KUD Tunggal Mulya, KUD Sinar Sawit Bahagia, KUD Dwi Tunggal, KUD Tani Mandiri, KUD Maju Jaya	2016	South Sumatra	Certified
Sri Kamusan	2010	Hibumas 1, Hibumas 2, Sri Kamusan, Jebawang, Sekar Imej, Sapi Sugut	2010	Sandakan, Sabah	Certified
PT. AMP Plantation	2011	AMP I, AMP II, AMP III, AMP IV, Primatama Mulia Jaya, Koperasi Tompek Tapan Kandis, Koperasi AWM, Koperasi BST, Koperasi MSJ	2011	West Sumatra	Certified
		KUD Dastra II, KUD Dastra 1	2019	West Sumatra	-
PT. ANI (Sambas)	2018	ANI Sambas	2018	West Kalimantan	IC
		KUD Cempaka Biru, KUD Sentama Lestari (Plasma binaan ANI 1 Sambas)	2018	West Kalimantan	IC
PT. Buluh Cawang Plantation	2012	Bumi Arjo, Dabuk Rejo, Sukamulya, Bambu Kuning	2012	South Sumatra	Certified
PT. Bumi Sawit Kencana	2012	Bumi Sawit Kencana 1, Bumi Sawit Kencana 2, Karunia Kencana Permaisejati 1	2013	Central Kalimantan	Certified
PT. Sarana Titian Permata (POM 1 and POM 2)	2023	Sarana Titian Permata 1, Sarana Titian Permata 2, Sarana Titian Permata 3	2023	Central Kalimantan	-
PT. Gersindo Minang Plantation	2013	Gersindo Minang Plantation, Permata Hijau Plantation-1, Permata Hijau Plantation-2	2013	West Sumatra	Certified
		KUD Sasak, KUD Kapar, Mutiara Bosa Sikilang, Permata Sawit Maligi	2019	West Sumatra	-
		PHP-1 (block 22)	2020	West Sumatra	-
PT. Daya Labuhan Indah	2013	Wonosari, Sei Deras, Cabang Dua	2013	North Sumatra	Certified
PT. Milano (Cabang Dua Estate)	2013	(Supply base DLI-2)	2013	North Sumatra	Certified
PT. Agro Palindo Sakti	2014	PT Agro Palindo Sakti Estate	2014	South Sumatra	Mill stop operation
PT. Mentaya Sawit Mas	2015	Mentaya Sawit Mas 1, Mentaya Sawit Mas 2, Bumi Sawit Kencana 2	2015	Central Kalimantan	Certified

PT. Sinarsiak Dianpermai	2020	PT Sinarsiak Dianpermai Estate	2020	Riau	-
BBPOP (Benso Plantation)	2015	Benso, Benso Smallholder	2015	Ghana	Certified
PT. Murini Sam Sam	2015	Murini Sam Sam Estate	2015	Riau	Certified
PT Bumi Pratama Khatulistiwa	2017	Bumi Pratama Khatulistiwa Estate Buluh Cawang Estate	2017	West Kalimantan	Certified
PT Karunia Kencana Permaisejati	2017	PT. Karunia Kencana Permaisejati 1, PT. Karunia Kencana Permaisejati 2, PT. Karunia Kencana Permaisejati 3	2017	Central Kalimantan	Certified
PT Rimba Harapan Sakti	2015	PT. Rimba Harapan Sakti 1, PT. Rimba Harapan Sakti 2, PT. Kerry Sawit Indonesia 3	2015	Central Kalimantan	Certified
PT Agronusa Investama Landak	2020	PT ANI 2 Landak PT Pratama Procentindo	2020	West Kalimantan	-
PT. Agro Palindo Sakti 2	2020	Agro Palindo Sakti, Putra Indotropical, Daya Landak Plantation, Indoresin Putra Mandiri	2020	West Kalimantan	-
PT. Agroindo Indah Persada 2	2023	PT Agroindo Indah Persada Estate	2023	Bangko – Jambi	NPP Audit
PT. Musi Banyuasin Indah	2020	Sei Selabu, Sei Jarum, KUD Karya Gatra, KUD Karya Makmur Sriwijaya, KUD Panca Karya Jaya, KUD Sumber Makmur, KUD Tri Tunggal Karya	2020	South Sumatera	-

Time bound plan update 02 August 2019 signed by head of sustainability. The update because reduction of scope supply bases of AMP POM - PT AMP Plantation namely PT PANP and PT KAMU due to has ended of management agreement between Wilmar and GAMA.

1.10.2 Progress of Associated Smallholders and Outgrowers for Certifiable Standard

PT.BPK received FFB from other sources:

- BCP Estate (PT. Buluh Cawang Plantations subsidiary of Wilmar International Ltd)
- BCP Plasma (Smallholders of PT. BCP)
- Independent supplier
- KUD Mekar Lestari (Smallholders of PT. BPK)
- KUD Tuah Jubata (Smallholders of PT. BPK)

FFB from PT. Buluh Cawang Plantations

BCP Estate (PT. Buluh Cawang Plantations) is part of the management unit of Wilmar International Ltd so that it will participate in RSPO certification in accordance with Timeboundplan in 2020. For BCP Plasma (KUD Mentibar Cemerlang) is a smallholder of PT. BCP Based on agreement dated 27 April 2011, the BCP plasma did not cooperate directly with the BPK mill. In agreement article 26 it is explained that FFB from BCP Plasma will be sent to PT. BCP mill but if PT. BCP does not have a mill, the delivery of FFB will be carried out by PT. BCP to third parties (at this time is PT. BPK mill), so that the delivery status of FFB from BCP Plasma to PT. BPK mill is just temporary and no need for certification

FFB from Independent suppliers

- PT. Artha Unggul Lestari

- CV. Bintang Borneo
- H. Muhammad Amin
- Hetty Meidiawati
- PT. Indy Mandiri Globality
- Lesman Simbolon
- PT. Agro Alam Nusantara
- PT. Nusa Jaya Perkasa
- PT. Rajawali Jaya Perkasa
- CV. Mitra Bintang Utama
- CV. Sawit Makmur Abadi
- PT. Kapuas Jaya Abadi
- PT. Mitra Andalan Sejahtera

Agreement based on independent and non-binding agreement to sell FFB exclusively by the supplier to continue sending its FFB to the BPK Mill. This is shown in the example of agreement No. 001/SPK-BPK Sei. Tempayan/PB-TBS/II/2019 with CV. Mitra Utama Utama, SPK No. 001/SPK-BPK Sei. Tempayan/PB-TBS/II/2019 with PT. Indy Mandiri Globality. This matter not applicable for certification

FFB from smallholders of PT. BPK

PT. BPK cooperates with plasma plantations namely KUD Mekar Lestari (Agreement No. 23/BPK-DIR/PK-II/98 dated 12 February 1998) and KUD Buah Jubata (Agreement on 25 February 2015). These cooperation agreements start from plantation development and FFB delivery for one crop cycle (until the productivity of the plant is exhausted = \pm 25 years. In terms of operational management carried out by the company as long as the credit of the farmer has not been paid off. At present, the KUD Mekar Lestari management has been handed back to the farmer because the credit has been paid off as shown in letter No. 162/MBB/HEB/2010 dated 11 May 2010 from CIMB Niaga Bank and letter No. 057/PLM-Ext/XI/12 dated 16 November 2012 from PT. BPK. The KUD Buah Jubata is still managed by PT BPK because credit has not been paid off. Since the BPK mill received a certificate in 2017, FFB from the two KUD's is still sent to the BPK mill due to being still bound by a contract. Based on the description, the two KUDs are obliged to take certification within 3 years after the Mill of PT. BPK gets RSPO certificate, **so that in ASA-2 the certification of KUD Mekar Lestari and KUD Buah Jubata becomes a non compliance with the Minor grade (NCR No. 2019.02).**

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-2	<p>1. Leonada (Lead Auditor). Bachelor of agriculture for plant breeding and seed technology programme study, department of agronomy, faculty of agriculture in Bogor Agricultural University. Having experience of more than five years working as a plantation operations staff and sustainability in private company of Indonesian oil palm plantations and is currently working on independent certification bodies as auditor. Training have been followed are: training of Indonesian sustainable palm oil (ISPO) lead auditor, training of RSPO lead auditor, RSPO SCCS training, SA 8000, ISO 17021; 2011, ISO 17065; 2012, ISO 19011; 2011, lead auditor ISO 9001; 2008, ISO 14001; 2005, training of management development program agronomy, training of analysis base solution for operation, training of integrated pest management (IPM), use of limited pesticides training, training management of waste pesticides and fertilizers, training mediation and conflict resolution, RSPO social and worker welfare training, general safety specialist training, health and safety management system (SMK3) auditor. In this audit He conducted an assessment on Legal and land dispute</p> <p>2. Asystasya Aishah Silalahi (Auditor). Indonesia Citizen, Bachelor of Economy, Major of Agribusiness, Faculty of Economic and Management. She has one year experience in consultancy. She has followed training such as ISPO Auditor Training, Lead Auditor ISO 9001:2015, OHS General Expert, RSPO lead auditor training course, SCCS, and several in house training related to environmental, BMP, SA 8000, etc. Has been involved in several audit activities since 2016 related to sustainable palm oil certification covering waste management aspect, Social Aspect, Health and Safety Aspect, and Worker Welfare. During this audit, she verify Social, transparency, and Worker Welfare aspects and SCCS.</p> <p>3. Hasiholan Sihombing (Auditor). Indonesian citizen. Bachelor of Agriculture Majoring in Agronomy, Agriculture Faculty. He has working experienced for 7 (seven) years since 2009 as an Operational Staff in an Oil Palm Plantation Company in Indonesia. The training he has followed namely: Lead Auditor ISPO, RSPO P&C Lead Auditor Course by Checkmark, SA 8000 Awareness, Quality Management Systems (ISO 9001:2015), Environmental Management Systems (ISO 14001:2015), OHS General Expert, OHSAS 18001:2007, ISO 19011:2018, ISO 17021:2011 and ISO 17065:2012. He has experienced in various audit activities related to the certification system of sustainable palm oil plantation since 2016. During this audit, he assigned to verify best management practices, long term plan, and OHS aspects.</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, and Green House Gases.</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA-2	<p>Number of auditors : 4 auditor</p> <p>Number of days for ASA-2 at site : 5 days</p> <p>Number of working days for ASA 2 at site : 20 Working days</p>
2.2.2	Assessment Process
ASA-2	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Bumi Pratama Khatulistiwa to the requirements of Indonesian National Interpretation of RSPO Principles and Criteria 2013, endorsed September 2016 and Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014 Revised June 2017 (Module E for CPO Mill).</p> <p>From morning until afternoon, the team traveled from Jakarta to Pontianak by plane and travel to site by car. Then continued holding an opening meeting. The opening and closing meeting was held in the Meeting Room attended by</p>

the Areal Controller, Estate Manager, Mill Manager, Assistants, and other related personnel's. During audit activity, auditors always accompanied by client and the documents are presented well. The audit is conducted in accordance with audit plan.

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

Some opportunities for improvement of the results **ASA-2** delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase (**ASA-3**).

Improvement of findings from main assesment findings were observed by auditors at this **ASA-2** assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of **ASA-2**

The assessment program please find Appendix 2

2.2.3 Locations of Assessment

ASA-2 Number of unit in this certification activity is 1 (one) Mill and 1 (one) Own Estates. The auditor team used the $(0.8\sqrt{y}) \times (z)$ formula to determine the management units sampling to be focused on and also considered the issues raised by stakeholder. (y) is the number of estate and (z) multiplier defined by the risk assessment. The consideration for risk assessment are geographic locations, distance of estate, complexity of labour, landscape setting, presence of HCV, number of communities/conflict, legality etc. Based on this formula, the auditor team determined that the sampling locations are one palm oil mill (Bumi Pratama Khatulistiwa POM) and one estate (Bumi Pratama Khatulistiwa Estate).

BPK POM:

- **Loading Ramp (4 workers).** Observation and interview with sortation personnel related to personnel understanding over sortation procedure, the implementation of sortation, fruit criteria, fruit separation with ripeness and rawness criteria.
- **Sterilizer Station (1 worker).** Observation and interview with operator related personnel understanding over the applicable SOP, infrastructure in mill, the implementation of occupational health and safety, medical examination, trainings from company and worker welfare.
- **Press Station (1 worker).** Observation and interview with operator related personnel understanding over the applicable SOP, infrastructure in mill, the implementation of occupational health and safety, medical examination, trainings from company and worker welfare.
- **Boiler Station (3 workers).** Observation and interview with operator related personnel understanding over the applicable SOP, infrastructure in mill, the implementation of occupational health and safety, medical examination, trainings from company and worker welfare.
- **Power House Station (1 worker).** Observation and interview with operator related personnel understanding over the applicable SOP, infrastructure in mill, the implementation of occupational health and safety, medical examination, trainings from company and worker welfare.
- **Kernel Station (1 worker).** Observation and interview with operator related personnel understanding over the applicable SOP, infrastructure in mill, the implementation of occupational health and safety, medical examination, trainings from company and worker welfare.
- **WTP** Observation of water treatment activities and the use of chemicals. Interview related to wages, implementation OHS and complaint mechanism.
- **WWTP** Observations and interviews related to wastewater management, working hours, PPE, measuring instruments used liquid waste (flow meter),
- **Hazardous waste warehouse** Observation and interviews related to hazardous waste management, OHS implementation, employment and complaint mechanism.
- **Chemical Storage** Observation and interviews related to chemical and pesticide storage area, hazardous waste management, employment, and implementation OHS.
- **Empty Bunch Area** Observation related to waste management and OHS Impelementation.
- **Workshop** Observation and interview with operator related personnel understanding over the applicable SOP, overtime, minimum wage, medical examination, trainings from company, OHS license and worker welfare.

- **Fuel Tank** Observation of waste management and OHS implementation.
- **Simulation** (hydrant) emergency response simulation

BPK Estate:

- **Block 121AB Division 1 (8 Pesticide Applicators)**. Observation on safe working practices and interview with the spraying workers related type of pesticides use according to the procedure and also worker welfare.
- **Block 111B Division 1 (7 Fertilizer Applicator)**. Observation on safe working practices and interview with the fertilizer workers related type of fertilizer use according to the procedure and also worker welfare.
- **Block 128E Division 2 (5 harvesters)**. Observation and interview with harvester related fruit ripeness, safe working practices and also worker welfare.
- **Block 120A Division 1 (11 harvesters)**. Observation and interview with harvester related fruit ripeness, safe working practices and also worker welfare.
- **Block 121C Division 1 (Barn Owl Nest Observation)**. To check nest condition.
- **Block 210A Division 1 (Peat Area)**. Observation peat area, water management, water level monitoring, piezometer monitoring and subsidence pole conditions and staff interviews on monitoring techniques.
- **Block 127E Division 2 (Peat Area)**. Observation peat area, water management, water level monitoring, piezometer monitoring and subsidence pole conditions and staff interviews on monitoring techniques.
- **Pesticide Warehouse** Observation and interviews related to chemical and pesticide storage area, hazardous waste management, employment, and implementation OHS.
- **Fertilizer Warehouse** Observation and interviews related to hazardous management, waste management and implementation OHS.
- **Sprayer and PPE storage**. Observation of environmental aspects and OHS
- **Clean Water** observation of clean water management for employees
- **Housing Phase 4 Div 2** Observation of the availability of infrastructure such as employee housing facilities, water facilities, educational facilities, religious facilities, health facilities and sports facilities.
- **Workshop** Observation and interviews related to the competence of workers, implementation OHS (including medical check up), employment, waste management and complaint mechanism.
- **Hazardouse waste Warehouse Div 2** Observation and interviews related to hazardous waste management, OHS implementation, employment and complaint mechanism.
- **Hazardouse waste warehouse Div 1** Observation and interviews related to hazardous waste management, OHS implementation, employment and complaint mechanism.
- **Clinic** Observation and interviews related to hazardous waste management, employee health care, wages and employment.
- **Landfill block 142C Phase 4, Div 2** Observation related to domesctic waste management
- **Kindergaten** observation of educational facilities
- **Worship place** observation facilities for employees
- **Fire extinguisher warehouse**. Observation related equipment of emergency response personnel

Interview with Stakeholder

- **Environmental Agency**. Interview about environment issue.
- **Manpower and transmigration agency**. Interview about employment and worker issues.
- **Mega Timur and Sungai Malaya Village**. Interview about land issues, social, and environmental aspect. Also interview with 5 previous land owner.
- **Tuah Jubata Cooperative**. Interview about worker, OHS, and social aspect.
- **Local contractor of CV Ainun and FFB transport**. Interview about worker, OHS, and social aspect.
- **Labor union, gender committee, worker cooperative of PT BPK**. Interview about employment and worker issue.

2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.

ASA-2	<p>Consultation of stakeholders for PT BPK held by:</p> <ol style="list-style-type: none"> 1. Public announcement at web www.mutucertification.com on 10 June 2019 (http://mutucertification.com/wp-content/uploads/2019/06/Notification-of-RSPO-Surveillance-2-of-Bumi-Pratama-Khatulistiwa-POM-PT-Bumi-Pratama-Khatulistiwa-subsidiary-of-Wilmar-International-Ltd.pdf) 2. Public consultation by phone with government agencies in Kubu Raya Regency (Environmental Agency and Manpower and Tranmigration Agency) on 25 June 2019. 3. Public consultation by interview with locals of the nearby village (Sungai Enau and Mega Timur Village), Cooperative and local contractor on 25 and 26 June 2019. 4. Consultation meeting and interview with Internal Stakeholder (labour union, worker cooperative and gender commiitee) on 25 June 2019. 5. Consultation with NGO (Sawit Watch, Walhi, AMAN and WWF) via email on 18 June 2019. <p>Numbers of input from stakeholders were clarified by PT Bumi Pratama Khatulistiwa</p>
2.3.2	Stakeholder contacted
	<i>Please find appendix 1</i>
2.4	Determining Next Assessment
	The next visit (ASA-3) will be determined eight (8) month to twelve (12) month after date of annual license (July to October - 2020).

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Bumi Pratama Khatulistiwa POM – PT Bumi Pratama Khatulistiwa, Wilmar Intl Ltd operation consisting of one (1) mill and one (2) oil palm estates.

During the assessment, there were one (1) Nonconformities were assigned against Major Compliance Indicator(s) and one (1) nonconformance(s) against supply chain requirement for CPO mill and five (5) opportunity(s) 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 action(s) that had been reviewed and accepted by Auditors in form of documentation evidence(s) e.g. (*document record/photographic/etc...*). Those corrective actions taken that consist of two (2) Major non-conformitis had been closed out shall be verified during next assessment.

MUTUAGUNG LESTARI found that Bumi Pratama Khatulistiwa POM – PT Bumi Pratama Khatulistiwa, Wilmar Intl Ltd complied with the requirements of RSPO Principles and Criteria 2013, endorsed September 2016 and Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014, Revised on 14 June 2017 (Module E for CPO Mill).

Therefore MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is continued

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
PRINCIPLE #1 COMMITMENT TO TRANSPARENCY		
1.1	Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	
1.1.1	<p>Company has the list of document that can be accessed by stakeholder, such as company's policies, licensing, reporting, and so on. The list of document can be seen in Transparency Procedure (SOP 52/WIP-KB/(01)/1015) valid from 1 October 2015. Company also submit mandatory reporting regularly to related statutory bodies as part of providing information to stakeholders, such as:</p> <ul style="list-style-type: none"> - Employment reporting by online on 6 March 2019 - Plantation report to Plantation Agency and National Land Agency of Kubu Raya Regency on 16 April 2019 <p>Mechanism for providing information is listed in Transparency Procedure (SOP 52/WIP-KB/(01)/1015) valid from 1 October 2015. The procedure explain that all the information request will be responded by company in 14 days after the incoming letter. Based on interview with statutory bodies in Kubu Raya Regency, Sungai Enau Village, and Mega Timur Village, it is known that that they don't have any difficulty to communicate with the company for information request.</p>	
1.1.2	<p>Mechanism for providing information is listed in Transparency Procedure (SOP 52/WIP-KB/(01)/1015) valid from 1 October 2015. The procedure explain that all the information request will be responded by company in 14 days after the incoming letter. The person in charge for communication and consultation is <i>Bina Mitra</i> Department. The information request from stakeholders is about assistance proposal and mandatory reporting information and has been documented by company in <i>Buku Surat Masuk</i>. For example: The letter dated 9 November 2018 from Agriculture Faculty of Tanjungpura University about request for discussion and visits to PT BPK and it has been responded by PT BPK.</p>	

	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		
<p>Company has list of document that can be accessed publicly that listed in Transparency Procedure (SOP 52/WIP-KB/(01)/1015) valid from 1 October 2015. The procedure sets public documents and documents with limited accessed. The public documents, such as legal document, environmental documents (environmental policy, environmental management and monitoring report, etc), social document, OHS policy and program, and continuous improvement documents. These documents are available in estate and mill office.</p> <p>Public document also can be seen in notice board, such as company's vision and mission, public report, or company's website. Based on interview with representative of Mega Timur and Sungai Melaya Village and related agencies of Kubu Raya Regency, it is known that they are aware of public document and don't have difficulty to access it.</p> <p>Company also has monitoring and management report, such as OHS implementation report, report of environmental management and monitoring plan, land use report, and plantation activities report. These documents also can be accessed by public through the mechanism which has determined by the company.</p>		
	Status: Comply	
1.3		
Growers and millers commit to ethical conduct in all business operations and transactions.		
1.3.1		
<p>Company has code of conduct document for all operational activities that listed on Document No 003/DIR-KP/IV/2016. Code of conduct explain Code of Conduct Principles, Conflict of Interest, Bribery and Illegal or Unethical Practices, Entertainment and Gifts, Misuse of Position, Insider Trading, Confidentiality, Restriction on Solicitation, Media Relations, Trade Union, Political and Social Activities, Installation of Illegal Computer Software, Anti Money Laundering, Trade Compliance & Export Controls and Sanctions, and Commitment to Human Rights.</p> <p>This policy has been socialized to the workers in each unit, such as on 27 June 2018 to 3 local contractor and 23 April 2019 to 12 workers in Division 2. This policy is available in Indonesian Language. Based on interview with worker in estate and mill, it is known that they understand about the code of conduct. And also, contractor knew and understand about the ethical conduct.</p>		
	Status: Company	
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.		
<p>The Company has list of regulations of 2019 that includes local regulations and national regulation updated annually. List of laws/regulations listed has covers several aspects such as land permit and legality, manpower, occupational health and safety, best management practices and environment. The company has shown the evidence of legal requirements compliance such as plantation bussines permit No. 448/Menhutbun-VII/2000 dated 25 April 2000 for areas 4,814.96 Ha. The other compliances of regulations are regarding to environment aspects are EIA management and monitoring in routinely, hazardous waste storage license approved by local government. Compliances of workers and OHS regulations are provided the minimum wage, company safety & occupational health, transporting and forklift operator etc. At ASA-2, it known that managed area of PT. BPK is 4.843,93 Ha. The company has arranged the additon of permit to the government, so the addition coverage area of plantation bussines permit progress becomes opportunity for improvement to the company (OFI).</p>		

Based on interview with stakeholders such as government agencies and other stakeholders such as workers union and surrounding communities it is known that the company has comply the related regulations for example: hazardous waste storage permit, there is no environment issues etc.

2.1.2, 2.1.3 & 2.1.4

Procedure of legal requirement which presented in document SOP 02/WIP-KB/(02)/1015 dated 1 Oktober 2015. The procedure explaining personel who have responsibility to update the regulation and law, identification and inventory, evaluation and monitoring Information of regulation from national, provincial and district regulatory bodies, and renewal of any changes to prevailing laws and regulations and monitoring of expired regulations/licenses. A list of regulatory identifications ranging from Laws, Government Regulations, Presidential Decrees, Ministerial Regulations, Ministerial Decrees, Regional Regulations, and the ratification of the ILO. The Internal audit of regulations compliance are conducted annually as example on 2 May 2019. The internal audits have shown the company's compliance of legal requirements according to the list of regulations 2019.

Status: Comply

2.2

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

2.2.1

PT. BPK has managed totaling area for about 4,843.93 Ha as scope of certification. The corporate area originates from state land with other usage area status, in which there are several community's land. The acquisition process began with obtaining a location permit from head of land agency of Pontianak District in 1996. The next process is land acquisition from community's area by providing compensation since 1998. The Document of land use right (HGU) on an area of 4,843.93 Ha can be shown by PT BPK, consisting of:

- HGU for an area of 4,814.96 Ha based on Minister of Agrarian / Head of BPN Decree No. 18/HGU/BPN/96 dated 31 May 1996. 30-year concession valid until 21 July 2026 (HGU Certificate No. 59 of 1996 dated 29 July 1996).
- There are 2 HGUs which has expired, namely:
 1. Head BPN Decree No: 06/HGU-KB/1989 dated 8 November 1989, valid until 31 December 2014 (HGU Certificate No. 56 of 1989) covering an area of 16.1843 Ha.
 2. Head BPN Decree No: 07/HGU-KB/1989 dated 8 November 1989 covering an area of 23.3719 Ha, valid for 25 years (HGU certificates No. 57 of 1989).

HGU certificate No. 56 & 57 are being extended as indicated by issuance the new field map:

- No. 59-14.14-2018 dated 17 October 2018 for 4.4270 Ha
- No. 60-14.14-2018 dated 17 October 2018 luas 10.9100 Ha
- No. 61-14.14-2018 dated 17 October 2018 luas 13.6300 Ha

The process of obtaining HGU extended (certificate No. 56 & 57) is becomes opportunity for improvement to the company to ensure the process of HGU extention (**OFI**).

2.2.2

Procedure of legal boundary poles monitoring and maintenance is presented in document No.001/SOP/GIS/2014 dated 1 July 2014, mentioned that maintenance was carried out by estate. The Estate management were able to shows location of boundary poles map as well as its coordinate points, which presented in document of Specific Situation Map No. 59-14.14-2018, No. 60-14.14-2018, No. 61-14.14-2018. Boundary poles monitoring record in May 2019 informed that 68 poles in BPK Estate and 22 poles in BPK Mill were in good condition and satisfactory maintained.

Based on field observation to Poles No. 001, 002, 003 P15 block 51 (Mill), No. T17A block 120A, No. P20A block 120C and No. P28A block 121C it could be concluded that estate management has monitored their boundary legal poles, clearly demarcated and visibly maintained . Verification using GPS indicates that the pole coordinate is in accordance with the provisions of the land title and confirmed that there has been no planting beyond the legal demarcated boundary areas of the plantation.

2.2.3, 2.2.4, 2.2.5, 2.2.6

The Company has established the mechanism for conflict resolution and land dispute in the procedure No.SOP59/WIP-KB/(0)/0915 dated 1 September 2015. Based on interview with communities and field observations, there were no significant land disputes and no indication of contractually army or paramilitaries using in plantation area of PT. BPK. However, it was reported by estate management that within the HGU area there is still land that recognized as belonging to the community who are not willing to be compensated (± 149.14 Ha). There is an agreement (dated 4 February 2017) stated that the area is still managed by the community and the company does not take over by force on the land. The community has understood that their land is in the company's HGU, but does not willing to release the land to the company. Based on interview with the communities and field observation in block 49, 48A, 48B, 48C are not found significant dispute or any disturbance from the company to that areas.

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, 2.3.2, 2.3.3 & 2.3.4

The Company has FPIC procedure No.SOP01/WIP-KB/(1)/1215 on 1 January 2015 regarding to social conflict management and land conflict resolution. The Company has no new land acquisition and the entire compensation process was completed in 2006. The results of compensation documents verification and interview with communities (Mega Timur Village and Sungai Malaya Village) are known that there are no indigenous rights or customary rights and there is no issues regarding to FPIC process. The compensation process are not diminish the legal/customary right, landowners are given the freedom to release their land without coercion.

In the HGU area of the company there are still areas of community land that have not been compensated (± 149.14 Ha), this is because the cultivators are not willing to relinquish their cultivated land. There is an agreement (dated 4 February 2017) stated that the area is still managed by the community and the company does not take over by force on the land. The community has understood that their land is in the company's HGU, but does not willing to release the land to the company. Based on the results of visits to cultivated areas in block 49, 48A, 48B, 48C and from interviews with communities it is known that the company did not force or seize these areas.

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

CH has documents on the long-term plan contained in the PT Bumi Pratama Khatulistiwa Financial Projection period 2015 - 2020 which contains:

- Financials (FFB production, total FFB processed, OER, KER, CPO production, PK production, own FFB sales to related-co, FFB price (Rp/mt), CPO price (Rp/mt), PK price (Rp/mt), CPO revenue, PK revenue, Gross operating profit, Profit after and before taxation, total operating cash surplus (deficit), Taxation, servicing of finance and cumulative cash after servicing of finance).
- Area Statement (mature, immature, total plantable area, unplanted group, total area, FFB production).
- Crop and Estate Cost (seperti biaya Maintenance, harvesting, dan total biaya).
- Plantation Development Cost.
- Capital Expenditure Estate and Mill (Processing cost, direct labour, factory overheads and, indirect labour, general and admin).
- Sustainability Implementation Costs (Environment, Social, Health and Safety also Other Related Compliance Expenses).
- Plan for management of scheme smallholders.

Annual planning also evaluated at the end of year and compared with realization. It annual planning can be adjusted based on field condition, financial condition or another reason. Based on information from representative management (estate manager), the long-term plan has been planned well with top management (company directors) and sufficient or feasible as a management plan for achieving the long term economic and financial.

3.1.2

Replanting program has not been planned up to five (5) years due to the oldest planting year is 2000. Based on the procedures, the indicator of replanting is yield/ha (< 14 tons of FFB / ha), plant age (> 25 years), and plant height (> 13 meters).

Status: Comply

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

4.1

Operating procedures are appropriately documented and consistently implemented and monitored.

4.1.1

There is no change on procedure by the certified unit since the last assessment until this assessment (ASA-2) covered in "Agricultural Manual and Standard Operating Procedure For Oil Palm". The document contains about the procedure for pre-development survey, assessment and planting, nurseries, land clearing and preparation, legume cover crop, oil palm planting, upkeep and maintenance of oil palm, harvesting of Fresh Fruit Bunches, plant protection, pest, and disease management, oil palm to oil palm replanting, EFB mulching, quantitative agro management system (QAMS) and oil palm thinning technique.

Meanwhile, with regard to the processing in the mill, the company has had the document of processing job execution procedures (SOP of mills). The SOP consists of: Volume I (FFB Grading, Laboratory Sampling and testing procedures, general and security, weighbridge, loading ramp, sterilization station, threshing station, pressing station, clarification station, kernel recovery station and boiler house). Volume II consists of power plant, water treatment plant, waste management, land application and solid waste, EFB utilization, workshops, electricity system, quality, storage and delivery of CPO and kernel, laboratory, procedure for producing CPO with low FFA.

Interviews were conducted to harvester, pesticides applicator, and manuring worker in BPK Estate. Based on the results of interviews can be concluded that the workers understand the duties and responsibilities of their work in accordance with the applicable SOP.

The entire procedure both of plantation and mill has been included of safe working instruction, other than those described in the HIRAC document.

4.1.2 and 4.1.3

To ensure consistency of procedures implementation, company has a monitoring inspection mechanism that was carried out regularly through the internal audit activities. Internal audit conducted twice a year or if needed which the scope of the inspection includes estate and mill operational activities. There are several types of audits which are conducted routinely by the company. For example: (1) QAMS Audit (Quantitative Agronomy Management System). Carried out routinely once every two weeks by the Department of Ecological Management Unit (EMU) to monitor the activities of best management practice. Some of the findings among others relating to the rotten loose fruits in the path and circle of plant; (2) SDC Audit (System Development Control) which is aimed to audit the administration of the estate. Conducted every 6 month. All non-compliance records of internal audit has corrected and verified by the company.

Each unit has documented the operations of the estate and mill production such as daily reports, supervisor workbooks, etc. The field visit at the mill shows that the unit has been documenting the daily activities in a daily production report that documented by using computerized systems. There is an internal audit from the company to check and monitoring the performance of contractor related to compliance to company procedure.

4.1.4

The certificate holder already has the RSPO Supply Chain Procedure (SOP/BPK-ADM/007/0218 dated February 2018) which regulates the acceptance of the FFB of third parties, and regulate the acceptance of certified and uncertified FFB. BPK POM has record the origins of all third-party sourced FFB. The result of filed visit, document review and interview with the management, known that there are FFB's sourced from third party. The detail can be seen at basic information of this report.

Status: Comply

4.2

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

4.2.1 and 4.2.2

Management of soil fertility is regulated in the SOP Estate manuring section. Interviews were conducted on 7 fertilizer workers in block 111B Division 1 BPK Estate. From the interview result it is known that the workers can explain the procedure of fertilization well, that is in accordance with the dose determined based on the recommendation, sprinkled it in around and using calibrated containers.

BPK Estate shown the program and the realization of fertilization application for period until May 2019. Based on document review and interview with the staff, the realization of fertilization in BPK Estate reach 31.93% according to the program. Fertilization programs are on going and the company continues to target completion based on fertilizer recommendations issued by EMU.

4.2.3

CH has routinely monitored the changes on the nutrient status based on the regular soil sampling unit (SSU) and leaf sampling unit analysis (LSU) to determine fertilizers recommendation. The sampling spot has been determined in each division and block routinely by Ecological Management Unit (EMU) and it is supported by well-trained census officer in each division. SSU is conducted every 5 year, meanwhile LSU is conducted annually. The last LSU result was issued on June 2018 and the last SSU result was issued on September 2014. Visual observations performed every year at the time of leaf analysis activities. Visual observation is a consideration in determining the fertilizer recommendations, deficiency of nutrients and analyze the potential of disease which is likely to become endemic of a particular disease.

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

4.2.4

CH does not carry out EFB, POME, ash or fiber applications to the estate. Nutrient recycling is derived from the accumulation of oil palm plant biomass at the time of replanting, frond stacking from former harvesting activities, and planting of legume cover crop (LCC).

Status: Comply

4.3

Practices minimize and control erosion and degradation of soils.

4.3.1 and 4.3.2

The entire area of PT Bumi Pratama Khatulistiwa is peat. Maps of soil types are found in semi-detail land survey documents. The map scale used is 1:50,000. Based on the semi-detail soil survey map report in September 2014, it was informed that the slope of the land in the company's operational area is in the flat category (0-2° or 0-4%). Thus, the company does not have a sloping area management strategy.

4.3.3

CH shows a road maintenance program for 2019 period. BPK Estate have classified roads based on their conditions (good, medium and heavy). From these data the company made priority programs in road improvement. For example, the realization of road improvements in division 1 BPK Estate has reached 1,200 meters on April 2019.

Based on field observations throughout the audit activities, it was concluded that the road conditions on the BPK Estate were in good condition and could be passed.

4.3.4 and 4.3.6

In order to reduce the rate of decline in peat land subsidence, the company carries out water management activities, which refers to procedure No. SA 02 / WIP-KB / 0/2010 concerning the management of peat areas. The procedure states that the company must manage and monitor the height of the peat water level, by carrying out water level recording and monitoring, the water table that is read through the piezometer and the reduction of subsidence poles. Measurement of water level and water table is carried out every day, while subsidence is carried out once a year. According to document reviews, it could be concluded that the company procedures has adopt RSPO manual on BMPs for existing oil palm cultivation on peat 2013. Moreover, Indonesian regulations related to peat management such as Indonesia Forest Moratorium 2011, Presidential Decree No. 32/1990 and Minister of Agriculture Decree No. 14/2009 were also adopted.

BPK Estate has subsidence monitoring poles of 5 compliance points. The company shows the results of monitoring subsidence poles from May 2017 to December 2018. Monitoring of subsidence poles is done every year. From the results of the monitoring, various results were obtained. For example, in block 210A from 24 June 2017 to December 2018 there is a land subsidence of 2.5 cm. In general, the results of monitoring subsidence poles concluded that there was no significant land subsidence.

BPK Estate can show water level and piezometer monitoring documents from January 2018 to May 2019. The average water table is maintained in 30 cm below ground surface. Monitoring of water table is carried out every 2 week. At the time of visit in block 210A, water table measured were about 50 cm below ground surface and in block 127E, water table measured were about 30 cm below ground surface. Moreover, soft grasses and nephrolepis has looks maintained to retain soil moisture on the field.

4.3.5

PT BPK within the next three years after the ASA-2 assessment will not carry out replanting activities because the oldest palm oil is 19 years old (planting year 2000). In accordance with the replanting procedure owned by Wilmar International Plantation, it is known that replanting is carried out if the age of the plant has been 25 years or the palm oil height has been more than 13 m or the production per hectare per year for three consecutive years of less than 14 tons. Hence, it has not been implemented drainability assessments in BPK Estate.

Status: Comply

4.4

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

4.4.1 ; 4.4.2

CH has a water management plan for the 2019 period which describes the source and quality of drinking water quality at PT BPK including a decrease in the quality and quantity of water due to the activities of the plantations and mill. In addition, it has been explained related to the estimated needs and use of water for plantation and mill operations, as well as control and water conservation systems (distribution inspection system, detection, leakage and repair, recycling of water, emergency management, dry season emergency planning and integrated planning).

Identification of water sources is also contained in the HCV identification document. The identification of water sources includes:

- Malaya Tributary
- Ampening Trench
- Kongsu Trench
- Trench of Gotong Royong
- Landak River
- Tempayan River

The results of field visits and document verification are known that the company has realized several water source quality management and monitoring plans, such as:

- Conduct clean water quality testing for employee consumption needs.
- Marking the boundaries of river / trench management in accordance with the HCV identification document recommendations.
- Perform river quality testing periodically / every 6 months.

CH has been implementing monitoring of surface water quality in rivers (Upstream, downstream) landak river, Malaya river, gotong royong trench, kongsi trench, ampening trench, tempayan river. The monitoring results for the 2nd half has been included in the report monitoring management plant (RKL and RPL) second half of 2018. From the test results it is known that some parameters of the samples exceeded the quality standards. The company has shown the results of testing evaluations that exceed the quality standards, and one of them is because PT BPK is located in the peat area, so it affecting the quality of surface water.

Protection of the flow of water and swamp areas has been described in the SOP river border management No. document SOP17 / WIP-KB / (01) / 2015 dated October 2015. The SOP explains that the river border width for river width 10 - 30 m is 50 meters while the river border width for river width > 30 m is 100 m. CH also has a SOP of Watershed Management with document number: SOP 18 / WIP-KB / (01) / 0515 revision 1 of the validity date in May 2015. The SOP aims to ensure the sustainability of the watershed functions within the activity location.

4.4.3

Mill effluent produced by BPK POM processed at waste water treatment plant (WWTP), until it complying to standards before it discharged to water body. The company has waste water discharge permit no. 503/008 / DPMPSTSP-E / IPLC / 2017 dated November 23, 2017 with a validity period of up to 5 years.

Table test results waste water November 2018 – April 2019

Parameter	Baku mutu	Nov	Des	Jan	Feb	Mar	April
BOD	100	89	83	92	90	94	96
COD	350	136	126	270	241	252	258
TSS	250	38	114	134	150	193	164
Minyak	25	6.75	4.9	12.5	10.15	7.95	5
N total	50	44.85	30.18	42	47	21.6	21.5
pH	6-9	7.61	7.95	8.1	8.55	8.27	8.38

Waste water quality testing document review shown parameters are compliant to the standards quality, and all of waste water management and monitoring has been reported to related institutions for regular basis per 3 month. Field visit on WWTP during audit found there is no leakage indications and these area are managed well.

4.4.4

Water use monitoring is carried out periodically and recorded, for example the use of water for the past year is 209,790 m³ for FFB processing of 194,273 tons or equivalent to 1.14m³ / ton FFB. Observation at the BPK POM water treatment plant finds monitoring for boilers and the process of water use is carried out periodically by officers, and flowmeters function normally.

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During the previous audit activity the company already had a permit to use surface water, but when the ASA-2 activity took place the license had been exhausted, the company could show documentation of the extension of the permit to use surface water. (OFI)

Status: Comply

4.5
Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.
4.5.1

Procedure of Observation and Control of Disease set in the Agriculture Manual & Standard Operating Procedure For Palm Oil Plant, Chapter 8 Plant protection - Pest and Disease Management. In the procedure explained about the types of pests and diseases, the detection period (1 or 2 months), threshold control of pests and diseases, methods for sampling at the time of detection or the census, as well as the control recommendations. In this procedure was explained that the pest detection activities are conducted every one or two months.

Also available Procedures of Detection and census of Pests and Diseases for Palm Oil which aimed to ensure the pest and disease control program can be performed regularly and sustainable. In the procedure explained the description of activities, namely Detection of Pests and Diseases; Census of Pests And Diseases, planting the beneficial plants, reporting and documentation. IPM programs are conducted by the company, among others Pest Detection Program carried out periodically every two months and in case of attack symptom is held every month and Beneficial plant maintenance activities performed every month.

The company shows a record of pest monitoring and control for the period 2018 to May 2019. For example, rat attack in block 107D with an attack rate of 12% (above the 5% threshold) in January 2019, then controlling using chemicals (*Coumatetralyl*) until level of *Coumatetralyl* application is below 20% (in March 2019), the control is stopped. BPK Estate only controls pests with chemicals after the census results show results above the threshold.

CH has a good commitment to improve the use of pest natural predator as part of integrated pest control. One of natural predator development is the reproduction and the construction of barn owl box as a mechanism to control rat. The company monitoring barn owl box occupation at least once a month. The monitored parameter are the existing of barn owl in the boxes, left food, and sign of reproduction such as egg or owl. Currently, there are total 9 barn owl boxes in BPK Estate. Auditor has made an observation to the owl nest box in block 121C Division 1 where the condition of the nest box was in good condition but there are no signs that the nest is inhabited. The company has a plan to increase the number of owl nests in order to control biological pest attacks and reduce the use of chemicals.

4.5.2

The company has records of the training implementation for staff who are involved in the implementation of integrated pest management, for example, Integrated Pest Management training on 14 March 2019 with the number of participants are 15 employees consisting of census operators, supervisors, and field assistants. Based on interview with the worker revealed that the worker understand the method of plant pest and diseases census or detection.

	Status: Comply	
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4.6
Pesticides are used in ways that do not endanger health or the environment
4.6.1

CH has a procedure in using pesticides contained in Agronomy guidance and SOP of oil palm plantation on 2015 ratified by Group Head of Plantation. In the SOP showed the rotation of circle spraying and harvesting path, weed controls spot/selective weeding as other special grass and weeds by using pesticides in accordance with the target in the field for example grass controls by selective using *glyphosate*. In the SOP also not allowed using pesticide with active ingredient of *paraquat*.

Based on field visits and interviews with 8 pesticide applicator in block 121B Division 1 BPK Estate, it was concluded that workers knew about the function of the chemical used and selective when doing the spraying activity, as for example for *glyphosate* material used to spray the circle and harvesting path only while the weeds in inter row not sprayed. CH used *Isopropil amina glyphosate*, *Metil metsulfuron*, and *triclophyr*, which have received permission from the government.

4.6.2

CH has documented records of pesticide toxicity in the document of Monthly Pesticide Toxicity Data. The document is

recorded product name, active ingredients, LD50, percentage of active ingredients, total application, total active ingredients, FFB production and pesticide unit/kg FFB. This document is constantly recorded and updated by Estate Sustainability Officer each month.

4.6.3

CH has program to reduce the pesticide usage that covered at SOP Agronomy (No.SA11/EMU/0/1014) by replacing pesticides with biological controls such as using natural predators to control rat and planting the beneficial plant. Based on document review and field observation, several IPM program with biological approach that has been implemented such as rat control by *Tyto alba*, and leaf eater caterpillar by planting beneficial plant such as *Turnera subulata* and *Casia cobanensis*. Moreover, the company has also conducted early detection routinely listed in the monthly report of early warning system. There is no prophylactic use, it is shown that any pest control using pesticide is based on census result.

4.6.4

Based on Willmar Policy that released on 5 December 2013 stated that:

"Pesticides that are categorized as World Health Organisation Class 1A or 1B, or that listed by the Stockholm or Rotterdam Conventions, are prohibited except in emergency situation. Paraquat usage is prohibited"

Based on document verification and field visit to pesticide storage, BPK Estate was no longer use paraquat since 2013. But, there is use of WHO class 1B pesticides (trademark of Racumin with active ingredient *Coumatetralyl*) to control rat pests in 2018 to February 2019. The *Coumatetralyl* application is carried out because from the results of the detailed census the attack rate is above 5% (above the threshold). However, since March 2019, BPK Estate has not used the *Coumatetralyl* anymore because it has developed a natural enemy of mice, the owl (*Tyto alba*).

4.6.5; 4.6.7 and 4.6.9

The results of field observation in warehouse and interview with pesticide applicator in Division 1 BPK Estate, it is known that the employees have been given regular training in safe work practices. This was evidenced by the employee can demonstrate the correct way to work in accordance with the procedures including how use and handling the risks in accordance with material safety sheets. There have been sheets of safety work (MSDS) and the symbols of hazardous and toxic materials are properly installed on the walls and doors of warehouse.

The pesticide applicator also using personal protective equipment in accordance with specified hazard identification and material safety data sheet such as respirator mask, gloves, safety shoes, apron and googles. In addition, employees are also informed about the steps of secure work in each roll call in the morning before work. Meanwhile, the spraying workers interviewed also claimed that after spraying they will be washing up and drying up the PPE and spraying tools (sprayer tank, jerry, etc), and taking shower/changing clothes in special place near pesticide store of the division office. Therefore, based on field observation to mixing area in BPK Estate, that known there are storage for keeping all PPE's and spraying tools after use.

6.6; 4.6.10

CH has SOP for pesticide storage facilities and ways of working in pesticide storage places with no. document 14 / WIP-KB / (0) / 0610 revised 0 effective date January 2011. The procedure describes the procedure for making pesticide storage places, mixing places, storage rules, work procedures in pesticide storage warehouses and OHS provisions.

As a result of visits to chemical storage warehouses, it was known that chemicals were stored in accordance with applicable regulation. It was found a complete series of MSDS, in accordance to the current stock. Specific pesticides mixing site has also available. Water which had used for sprayer washing and pesticides mixing process was properly reused. The storage has also equipped with pesticide flows records, proper risk symbols, PPE, first aid and fire extinguisher. Based on the visit and interviews with chemical officers, ex chemical was sent to hazardous waste storage.

The company also has a hazardous and hazardous waste management document No SOP 19 / WIP-KB / (0) / 0610 revision document 01 validity date January 2016. In the procedure section it is explained about the management and storage of hazardous waste.

In terms of hazardous waste management, the Company cooperates with third party, namely PT Primanru Jaya as indicated by SPK No. 044/LGL/MOU/PMJ-BPKP/II/2019 dated February 20, 2019 and valid until December 31, 2018. PT Primanru Jaya has a permit to manage and transport hazardous waste from the authorized agency. CH has shown documents for handling hazardous waste in the form of a logbook, balance sheet and manifest of hazardous waste transported on April 4, 2019.

The results of interviews with workers, namely chemical warehouse officer and hazardous waste officer, were conveyed that officers knew the hazardous waste management mechanism. They also have trained for hazardous management training. All hazardous waste is placed in the hazardous waste warehouse and then transported by licensed transporters and hazardous waste collectors. Based on field visit in the plantation office, mill office and houseng complex known that no ex pesticides or hazardous material containers used for household purposes

4.6.8

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

4.6.11

CH has list of pesticide operator based on latest data of May 2019 as many as 117 workers BPK Estate. Medical examination (cholinesterase) has been conducted on 28-29 November 2018 to all pesticides workers in BPK Estate. The result of medical examination is informed to the workers and all pesticide operators are in a healthy condition (normal result). And also, based on interview with the workers, it is known that they are never get experience of occupational injury which caused by chemical such as irritation.

4.6.12

CH has an intern memorandum (058/HRR/INT/V/2012, date 31 May 2012) that prohibits pregnant and breastfeeding personnel working with chemical material. Based on interview with female spraying personnel, it is known that there was neither pregnant nor lactating female personnel who work with pesticide. Moreover, CH conducts pregnancy test and examination every 3 month. Audit team also got information that the personnel have understood that female personnel cannot work with chemical material if they are pregnant or lactating.

Status: Comply

4.7

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

4.7.1

CH has a policy of occupational safety and health available in Indonesian language. The policy has been legalized and updated on 2010 by Head of Group Plantation Indonesia. The company's commitment on the implementation of occupational health and safety within company's operation. This policy is designed to control hazards in every activity that is in the working environment to prevent accidents and occupational diseases. Management have work program of occupational health safety every year. Realization of the program of work will be monitored through regular meetings Guiding Committee of Occupational Safety & Health every month. This work program applies generally to all workers in the workplace. If the plans have been made yet on target then will be evaluated in the management review to assess effectiveness.

Interviews were conducted to estate workers (harvesters, manuring workers, and pesticides applicators) and mill workers (boiler operator, engine room operator, etc). Based on the results of interviews can be concluded that workers understand the OHS policy and it's recognized that every morning meeting is always affirmed about the importance of safety and the use of PPE in work.

4.7.2

CH shown the document of hazard identification, risk assessment and risk control which issued on January 2019. It will be reviewed if any occupational accident happen. The document describes the description/activity, potential hazards, risk assessment and risk control. Based on site observation at workshop in BPK POM and agrochemical warehouse in BPK Estate, it was clearly confirmed that workers had been aware related potential risk and hazards in the work place.

Following up on this, the company has been reduce the potential risk by routine socialization about OHS, providing PPE, and OHS signboard are available in workplace.

4.7.3

Based on documents verification and interviews, it is known that all operators at BPK Mill and BPK Estate already have lisenese such as boiler operators, lift carrier operators, welders and electrical technician. The management unit has had the training plan for workers exposed to high noise levels such as training of procedure, socialization of HIRAC and safety briefing before work.

The company has a document Risk Analysis and Hazard Identification (HIRAC) and PPE Procedure (31 / WIP-KB / (0) / 2011) which explains that harvesting activity is equipped with PPE such as helmets, shoes, glasses and gloves. The company also conducts OHS monitoring / inspection, one of which is related to the use of PPE regularly every month. However, based on field observations in block 51 (near the mill security post), it was found that 2 harvesters did not use PPE (helmets, shoes, glasses and gloves) when harvesting. Based on that evidence, the company has not been able to effectively ensure that PPE is used by workers in the field. This becomes a **Non-conformity No. 2019.01** with **MAJOR category**.

4.7.4

CH already has persons that responsible for the OHS program within the organizational structure of Committee of Occupational Health and Safety (P2K3) established in each management unit. The organization routinely conducts monthly meetings on OHS issues in the workplace. The documentation of the meeting were recorded and stored well. Based on interviews to workers who are members of the P2K3 organization it is known that monthly meetings are always routinely conducted to discuss about OHS such as consistency of PPE usage, work accident report, fire simulation, checking of emergency response equipment, OHS sign board, cleanliness of work area, etc.

4.7.5

CH has made efforts to prevent emergencies and accidents. CH has procedures related to the handling of emergencies and accident investigation, the procedure is still the same as the previous assessment. The procedures also explained that records of all accidents shall be kept and periodically reviewed. CH has emergency facilities and infrastructure such as fire extinguisher, first aid kit, hydrant, water tank, and other supporting equipment. Simulation was performed to know the preparedness of emergency response equipment in the POM. The simulation was performed on hydrants located in the mill and the result of the experiment was concluded that the hydrant tool is ready for use. As well as fire extinguishers in the estate, from the results of simulations carried out, it was concluded that fire extinguishers was ready for use.

BPK POM and BPK Estate has already licensed first aid officers and there was first aid internal training conducted on 17 June 2019 in BPK Estate which was attended by 23 participants. Based on field visits and interviews, it was found that all the supervisor in each of activities were equipped with first aid kit and had been trained on the use of first aid boxes and the supervisor explained the usefulness of each first aid kit.

4.7.6

CH has provide medical care for worker including contract and permanent worker. Medical care is covered by employment and health insurance (BPJS). The payment for BPJS is conducted every month according to the available rule. Besides, the company also provide medical facilities (clinic) for workers if work accident is occurred. Work accident will be reported to the BPJS Agency and claim for it will be done if the medical process has been completed. Based on interview with worker in estate and mill, it is known that both worker and their family is have been registered in health insurance (BPJS Kesehatan). There are some contractors in certification unit. Based on interview with contractor representative, it is known that the accident insurance for contractor's workers is covered by the head of contractor itself.

Based on interviews with BPK POM and BPK Estate employees, concluded that all employees were aware of the medical service procedures in the event of an accident or illness. All employees interviewed also claimed to have a health BPJS card and if they went to a company clinic there was no fee at all. During the last one year, there are no fatal accidents, so there are no claims against the occupational accident insurance.

4.7.7

CH has calculated the Lost Time Accident every month for monitoring the recording of occupational accidents. It shown the Lost Time Accident calculation per May 2019. This document informs the number of worker, number of working days, the number of non effective working days, overtime, hours of work in total, the number of accidents, the number of working days lost, hours of work a year, the number of accidents a year, lost days a year. Calculation of SR and FR is reviewed regularly and will be evaluated at monthly meeting of OHS Committee.

Major 4.7.3	Status: Non-conformity No. 2019.01 with MAJOR category.
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4.8

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

4.8.1

Company has training program for workers for period of 2019 for operational training. The aspect in the training program are such as environment, labor best management practice aspect, and others. Some of training program, namely:

- Socialization of OHS, work procedure, HCV to harvesters every month
- Training of risk assessment and environment aspect impact to supervisor on January, May, and October 2019
- SCCS training June 2019
- High risk training on April 2019

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

4.8.2

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

- OHS and policy socialization on 11 April 2019 to workers in Phase 3 of Division 2.
- OHS, RSPO, code of conduct, human rights policy on 3 July 2018 to 4 workers contractor
- Procedure of harvesting on 15 April 2019 to 12 workers in Phase 4 of Division 2

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

PT BPK has had Environmental documents in the form of EIA documents consisting of the Document Main Report, the Environmental Management Plan (RKL), Environmental Monitoring Plan (RPL) and Executive Summary. In the EIA document has outlined a plan description of the activities of the business or activity

- Stages of preparation / pre-construction; licensing, feasibility studies, project dissemination activities, boundary demarcation and land acquisition
- Stage physical development / construction; mobilization of heavy equipment and manpower, land clearing arrangement division and block, orchard road network construction, land clearing
- Physical development non crops: roads and bridges, drainage channels, office and residential buildings, the construction of a palm oil processing factory and WWTP.

The document has been approved by the Amdal Commission of Pontianak Regency and Pontianak Regent in accordance with Letter No. 660.1/024.a/IV/DLHESDM-B dated April 8, 2004 with a project area of 6,814.96 Ha consisting of 4,814.96 Ha and 40 ha for processing areas as own plantation and 2,000 Ha for Plasma plantations. Mill capacity which is the scope of the study is 30 tons of FFB / hour which is planned to be built outside the plantation area.

5.1.2; 5.1.3

CH has had applied environmental management and monitoring aspects in accordance with matriks of RKL-RPL. aspects that are managed and monitored based on the RKL RPL matrix among others :

- Social restlessness
- Flood
- Habitat of flora and fauna
- Land fire
- Increased community income
- Decreasing river water quality
- Public health

In addition, CH also conducts management and monitoring related to other impacts, such as:

- Noise
- Use of chemicals
- Waste
- Peat ecosystem

Implementation of environmental management has been conducted in accordance with the matrix environmental management plan (RKL). Based on the results of the field visit, it is known that the company has carried out environmental management activities, such as:

- Not carry out burning activities in the operational area, both land clearing and domestic waste management
- Providing social assistance to the community
- Providing employment opportunities to the surrounding community

CH also has conducted environmental monitoring as outlined in the Report of the Environmental Management and Monitoring for regular basis. These report described realization of monitoring and management of the environment in accordance with environmental parameters in the RKL/RPL. Based on document review, there has been an evaluation of the results of environmental monitoring and management described in the Report of RKL-RPL.

Based on document verification and field visits, it is known that the company has conducted environmental monitoring, such as:

- Conducting surface water quality testing
- Monitoring land fires
- Monitoring HCV / flora and fauna

A review of short-term management is carried out every 6 months in the implementation of RKL-RPL reporting and fulfillment and other evaluations are always carried out, while a 2-year review conducted on April 24 2018 is attended by Estate Managers, Division Managers, Mill Managers and 12 other staff. The results of the last evaluation concluded that the company made additional monitoring such as 2 sample water testing points (Kongsi Trench & Gotong Royong Trench). The other recommendation was to enter the SIA report into the RKL-RPL report.

CH has submitted reporting 2nd half (RKL and RPL) to the related agency such as Environmental Agency of Kubu Raya, Environment Agency of West Kalimantan Province, the Agriculture Agency of Kubu Raya district. There is evidence of a receipt document dated May 6, 2019.

	Status: Comply	
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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 had identification documents HCV in High Conservation Value Assessment Report in PT. BPK, Kubu Raya, West Kalimantan Province. Identification was done in cooperation with PT. Remark Asia in 2015 with the composition of the team as follows;

1. Yokyok Hadiprakarsa (ALS15019YP) as Licensed HCV Assesor
2. Wawan Gunawan (enviroment expert)
3. Eno Sumarno (Social expert)
4. Adi Wijoyo (GIS / Remote Sensing)

Preparation of documents HCV done with reference to the Guide Identification of HCV (HCV Toolkit Indonesia Consortium Revised 2008). Implementation of field surveys conducted in March-July 2015 with the implementation of public consultation on 17 April 2015 followed by 29 participants. Document of HCV Identification has reviewed on february 13, 2016. Based on the HCV assessment results it is known that the HCV area is 13.86 Ha including the plasma plantation area. while the total HCV area within the scope of the audit is 8.53 Ha.

5.2.2; 5.2.3

HCV identification results also explain there is an RTE species according IUCN-Redlist namely *Manis javanica*. The Company has established a Management and monitoring of HCV PT BPK year 2016-2020 which the goal is to become a reference in the implementation of HCV management areas in PT BPK as well as reference document in the implementation of the management and monitoring of HCV Area.

CH has been conducting a periodically monitoring every month for HCV areas, species monitoring, and wild hunting by HCV officer. For example, monitoring carried out on the river border on May 25, 2019 with the location in blocks 201a, 201b & 201c and Padagi in block 022. In the monitoring record, was conveyed the actual condition of the HCV area. At the time of the monitoring there were also several wildlife such as *biawak*, *burung bubut*, *burung kareo padi*, *burung blambangan* etc.

Related to RTE species, CH has a policy to protect species of wildlife protection RTE SOP SOP No. 15 / WIP- KB / (01) / 2015 in the SOP consists of :

- Not allowed to maintain or kill animals that are protected by state regulations or those that are not protected without company permission
- Not allowed to trade in wildlife protected and unprotected
- Not allowed to catch fish using poisons and electricity (stun equipment)
- Sanctions that apply if the employee is proven to do things that are prohibited such as the explanation above for protected animals in accordance with the provisions of the goverment regulation and company regulation in a row are subject to sanctions and termination of employment.

The company routinely conducts HCV socialization as indicated by HCV socialization records on September 15, 2018 to employe with total of 17 participants. Results Interviews with employees confirm an understanding of HCV protection. Other than that, CH has Socialization to local comunity such as Sungai Malaya Village, Sungai Enau Village, and Mega Timur Village on 27 July 2018 attended with 36 participant. The results of interviews with representatives of the village of Megatimur were stated that the company had socialized the HCV area. For example, by installing plank-plank HCV and disseminating the ban on hunting and cutting trees.

5.2.4

Company have established HCV management plan, and implemented it well. Regularly monitoring record shown company has been monitored hunting, and other illegal activities. All of records for monthly patrols on each estate are available and verified by auditors.

CH has evaluated the HCV management plan based on the results of HCV monitoring / patrol evaluated in August 2018. Based on the results of HCV monitoring, there are several corrective actions to the HCV management plan, including:

- Coordinate with the Incharge maintenance staff to clean the HCV area that contains waste and conduct socialization to employees and the community so that they do not dispose of trash on the land / ditch.
- Clean the water flow.
- Conduct socialization to the community about the HCV area and prohibition not to disturb / capture flora and fauna

- Request assistance from village officials to explain to the community not to conduct root burning activities in the area that has been designated as HCV and prevent land fires
- Conduct routine monitoring of secondary forests that including HCV.
- Socialization to employees, maintenance about how to maintain riparian areas

5.2.5

Plantings done long before the identification of HCV. At the beginning of the plantation, land acquisition from community lands into plantations has been done by the company. However, Based on the results of interviews with Management and the results of the document verification of operational map, it is known that there is an HCV 3 area in the company area which is also controlled by the community, but the company has not shown enough evidence of the negotiated agreement to protect HCV. until the ASA-2 audit of the company has not been able to show evidence of an agreement on management of the HCV area with the community, or evidence has been made of continuous efforts to reach an agreement on HCV management. **It become nonconformity no.2018.03.**

5.2.5 | **Status: Nonconformity No. 2018.03 with Minor Raised to Major Category**

5.3

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

5.3.1

The company has identified the resulting waste which is contained in the PT BPK Waste Identification List. In the document, describes activities that produce Non-hazardous waste and hazardous Waste. Some examples of hazardous waste produced, among others: ex chemical, chemical / oil spills, contaminated PPE, used oil, used oil filter, contaminated majun, Ink / toner, medical waste, used lights, etc.

5.3.2; 5.3.3

The company has a hazardous and hazardous waste management document No SOP 19 / WIP-KB / (0) / 0610 revision document 01 validity date January 2016. In the procedure section it is explained about the management and storage of hazardous waste.

In terms of hazardous waste management, the Company cooperates with third party, namely PT Primanru Jaya as indicated by SPK No. 044/LGL/MOU/PMJ-BPKP/II/2019 dated February 20, 2019 and valid until December 31, 2018. PT Primanru Jaya has a permit to manage and transport hazardous waste from the authorized agency. CH has shown documents for handling hazardous waste in the form of a logbook, balance sheet and manifest of hazardous waste transported on April 4, 2019.

The results of interviews with workers, namely chemical warehouse officer and hazardous waste officer, were conveyed that officers knew the hazardous waste management mechanism. They also have trained for hazardous management training. All hazardous waste is placed in the hazardous waste warehouse and then transported by licensed transporters and hazardous waste collectors. Based on field visit in the plantation office, mill office and houseng complex known that no ex pesticides or hazardous material containers used for household purposes.

The company has demonstrated other waste management such as factory solid waste, liquid waste, and domestic waste. Utilizes shell and fiber waste as boiler fuel which can be shown in the table below:

Month /2018	Shell for boiler (kg)	Fiber for boiler (kg)
June	450,209	922,740
July	632,561	1855,481
August	758,988	1979,837
September	904,593	2105,658
October	821,455	1936,085
November	756,937	2171,840
December	949,781	2032,840

Medical Waste

The company has managed B3 Infecsius Waste by collaborating with the Santo Antonius General Hospital as indicated by the extension of the agreement Between PT BPK and Santo Antonius Hospital with no. 633 / Dir / RSSA / PKS / V / 2019 which are effective from 1 June 2019 to 31 May 2020. Meanwhile the submission of the last B3 Infesius waste was carried out on May 31, 2019, indicated by Receipts and Proof of Handover of Waste from PT BPK that had been received by Santo Antonius Hospital Pontianak.

Liquid waste

Liquid waste is discharged into water bodies (Porcupine River) after meeting the permitted quality standards. Based on the results of the last 1 year testing, it was found that the quality of liquid waste was in accordance with the quality standard, there were no test results that were above the quality standard. The volume of liquid waste discharged during 2018 is 67,177 M3, while for 2019 until May 2019 the total liquid waste disposed of is 38,533 M3. Based on the visit to WWTP, it is known that the flow meter condition is in good condition. There is no indication of a leak in the WWTP area.

Domestic waste

The company manages domestic waste by dumping it into the TPAS located in the Estate area in Blok 142C Phase 4, Div 2, the waste is separated for organic and anorganic waste. The results of the housing estate field visit show that the company has provided a final waste disposal site as a domestic waste collection place.

Status: Comply

5.4
Efficiency of fossil fuel use and the use of renewable energy is optimised.
5.4.1

The company has showed efficiency of fossil fuel use and the use of renewable energy for 2018 period such as: efficiency of Shell is 0.05 ton/ton FFB), efficiency of fiber is 0.11 ton/ton FFB. The efficiency of fuel use is 0.30ltr/ton FFB.

Month	FFB	Shell	Fiber (ton)	Shell/ton FFB	Fiber/ton FFB
January	15,696.02	639.96	2,014.05	0.041	0.128
February	12,437.19	557.18	1,499.33	0.045	0.121
March	10,707.93	624.53	1,368.45	0.058	0.128
April	10,436.31	426.29	1,151.92	0.041	0.110
May	10,811.73	387.64	834.92	0.036	0.077
June	9,043.99	450.2	922.74	0.05	0.102
July	19,249.78	632.56	1,855.48	0.033	0.096
August	18,247.42	758.98	1,979.83	0.042	0.108
September	17,854.36	904.59	2,105.65	0.051	0.118
October	17,708.52	821.45	1,936.08	0.046	0.109
November	17,447.53	756.93	2,171.84	0.043	0.124
December	15,983.01	949.78	2,032.84	0.059	0.127

Month	FFB	Fuel	Fuel/tonFFB
January	15,696.02	4,726	0.301
February	12,437.19	3,717	0.299
March	10,707.93	7,771	0.726
April	10,436.31	6,921	0.663
May	10,811.73	7,682	0.711
June	9,043.99	7,877	0.871
July	19,249.78	2,301	0.12
August	18,247.42	2,885	0.158
September	17,854.36	1,947	0.109
October	17,708.52	2,336	0.132

November	17,447.53	2,549	0.146
December	15,983.01	2,621	0.164

The company has conducted an annual evaluation, for 2018 the evaluation results show the use of renewable energy has increased and will continue to be improved in the following years in accordance with the company's long-term plans.

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

5.5.1
 Commitment to prohibit burning in all operational activities of the company has been stipulated in the No Deforestation, No Peat, No exploitation policy, issued on December 5, 2013. In the document it is stated that the wilmar group applies a no-burn policy, where burning activity is not permitted during land preparation for new planting, replanting and or all other activities. CH also has a replanting SOP listed in the agronomy and SOP guidance document of the WILMAR 2015 oil palm plantation, explained that replanting is done mechanically and avoids burning.

5.5.2
 At the time of surveillance-1 assessment, it was found that there were no replanting activities. Land clearing activities for replanting were last conducted in 2015. The company showed example of work agreement related replanting activities No. 18 / BPK-REPLANTING / DIV-1/04/2015 dated 27 April 2015, the entire replanting process was carried out by mechanical means ranging from land clearing, chipping work, stump felling, stacking lines and drainage making.

	Status: Comply	
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5.6
Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.

5.6.1; 5.6.2
 CH has identified sources of pollution and emissions generated from all operational activities of the plantation and factory. The company also has plans to reduce or minimize these emissions. This is contained in the Mitigation document and efforts to reduce GHG emissions, such as:

- Providing appropriate training to spraying team
- Planting beneficial plants (cassia cobanensis, tunera spp and antigonon spp) in empty areas.
- EFB application
- Perform routine services on vehicles and generators
- Plant trees around generator houses and riparian belt areas.
- Perform leaf analysis to determine the type and dosage of fertilizer
- Land monitoring that has the potential to be fire-prone
- Etc

CH has also conducted an assessment of activities that cause pollution or emissions, for example:

- Liquid Waste quality testing
- air quality testing
- testing of emissions of boilers and generators
- noise testing
- odor testing
- and vibration testing

Based on the results of a field visit in the factory area, known that warning signs are posted at high noise areas.

5.6.3

CH also has conducted GHG emission calculations period 2018 use of 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 November 2005 Cut off for LUC for the reporting.

Summary of Net GHG Emissions

Emmision per product	tCO2e/tProduct
CPO	22.47
PK	22.47
<hr/>	
Production	t/yr
FFB processed	175526.134
CPO produced	3,1576.478
PK produced	6,836.703
<hr/>	
Extraction	%
OER	17.99
KER	3.89
<hr/>	
Lan use	Ha
Planted area	5584
Planted on peat	4765.637
Conservation Area	8.53

Summary of field emission and Sinks

Description Emissions Sources	Own crop tCO2e	tCO2e/tFFB	Group tCO2e	tCO2e/tFFB	3 rd party tCO2e	tCO2e/tFFB
Land conversion	41479.69	0.64	10426.4	1.04		
CO2 emmisions from fertilizer	4275.89	0.07	875.2	0.09		
NO2 emissions	37869.26	0.58	2058.83	0.21		
Fuel comsumption	745.06	0.01	282.91	0.03		
Peat oxidation	242310.98	3.71	10798.77	1.08		
Sinks						
Crop sequestration	-41546.72	-0.64	-6475.49	-0.65		
Sequestration in Conservation area	0	0	0	0		
Total	285134.16	4.37	17966.62	1.8	533775.72	

Summary Oil Mill Emissions and Credits

Remarks	tCO2e	tCO2e/t FFB
<hr/> Emissions sources		
POME	29557.01	0.17
Fuel consumption	587.14	0
Grid electricity	0	0
<hr/> Credits		
Export of grid electricity	0	0
Sales of PKS	-3981.58	-0.02
Sales of EFB	0	0
Total	26162.57	0.15

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, 6.1.2, and 6.1.5

Social impact assessment was conducted in April 2014 in collaboration with Remark Asia involving local communities. SIA documents have identified the positive and negative impacts of the company's operational activities, such as: providing employment and business opportunities to local communities, increasing incomes, decreased availability of forest product, change of mindset and lifestyle.

CH showed the documentation of Social Impact Assessment, involving 122 interviewees, 7 stakeholders. and through focus group discussion and public consultation. Stakeholders can submit their aspiration through FGD and public consultation.

6.1.3, 6.1.4, and 6.1.5

Social management plan is prepared simultaneously with review of management plan every two years. This plan is arranged based on participation of several village, such as Sungai Malaya, Sungai Enau, and Mega Timur Village on 26 July 2018. Management plan already set the management period and its PIC. Company has social management plan for 5 years (2014 – 2019). Management plan has informed the management period and PIC.

Management and monitoring plan identified, among others:

- Recruitment of local worker
- Hold regular meetings with the community
- Planning a *Bina Mitra* / CD-CSR program in a participatory manner according to community needs

Management plan has been implemented, such as:

- CSR/CD program for period of 2019 is available
- Recruiting local worker from Mega Timur and Sungai Enau Village
- Socialize mechanism of communication and consultation to worker and community

Based on interview with representative of Mega Timur and Sungai Enau Village, there are some issues identified when interview has been covered in management plan. Company need to improve the next review of management plan while re-identified all social impact and arranged the management and monitoring plan. (OFI)

Status: Comply

6.2

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

6.2.1

Mechanism for consultation with stakeholder is listed in SOP *Pemberian Informasi Kepada Pihak Luar (Transparansi)* (SOP 52/WIP-KB/(01)/1015) and SOP *Tata Cara Mekanisme Terbuka Pelaksanaan Komunikasi & Konsultasi Dengan Masyarakat* (SOP 58/WIP-KB/(0)/0915). This procedure explain about communication mechanism to stakeholder in order to implement the corporate transparency and available in Bahasa Indonesia. Based on interview with statutory bodies in Kubu Raya Regency, surrounding village, and smallholder, it is known that they understand how to communicate and consult with company.

6.2.2, 6.2.3

The PIC for consultation and communication with the community is *Bina Mitra* Department. The PIC is assigned to accommodate the implementation of social impact analysis, responsible for top management for communication and consultation with stakeholders Officers

List of stakeholder is made by CSR officer. The latest list of stakeholder is available for year of 2019, consist of statutory bodies, local communities, worker organization, supplier, hospital, and insurance company. The information request from stakeholders is about assistance proposal and mandatory reporting information and has been documented by company in *Buku Surat Masuk*. For example: The letter dated 9 November 2018 from Agriculture Faculty of Tanjungpura University about request for discussion and visits to PT BPK and it has been responded by PT BPK.

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

Company has a mechanism of complaint and grievance handling in *Prosedur Pengelolaan/Penanganan Keluhan dan Atau Pengaduan* (SOP 60/WIP-KB/(0)). Complain from worker can be submitted to worker's supervisor or Bipartite cooperative and complaint from external stakeholders can be submitted to public relation department. CH will protect the identity of complainant as written in Whistleblowing Policy (No. KP: 042/DIR-KP/VII/2015). Based on interview with worker in POM and estate, it is known that workers understand how to deliver their complaint if any. Based on interview with representative of Sungai Enau and Mega Timur Village, it is known that they understand the mechanism to deliver their complaint if any.

6.3.2

There were no external and internal complaints submitted during the period of 2019. Complaint monitoring is documented in *Log Book Keluhan*.

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 & 6.4.3

The Company has compiled a procedure of Land Compensation (SOP 01/WIP-KB/(0)/0610 dated 1 June 2010). The procedure is covered the process of identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation. The scope of procedure is all activities related to the compensation process for land over the land right cultivated by the Company, the purpose is to ensure the area of plantation free from others right. The Company has no new land acquisition and the entire compensation process was completed in 1998. The results of compensation documents verification and interview with communities is known that landowners are given the freedom to release their land without coercion. The process of FPIC is done by setting the Team, preparing work plan, preliminary study, FPIC agreement, meeting with the community/affected parties and recording.

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

Company has copy of Kalimantan Barat Governor Decree No 586/DISNAKERTRANS/2018 about minimum wage of Kubu Raya Regency. The minimum wage for Kubu Raya Regency is Rp 22,242,000/month.

CH showed wage documentation for each unit. Based on document verification, the basic wage is in accordance with applicable regulation. For example: employee code BX/PBPK/1105/33, payslip for May 2019. The basic wage and overtime payment is paid in accordance with applicable regulation. As for harvesters, the wage is paid in accordance with tonnage/day and it is above applicable minimum wage.

Based on interview with the harvester and committee of worker union, there were no complaint about working hours and wages payment too. Based on interview with worker in Mill and Estate, there is no complaint about wages. It is in accordance with Governor Decree applicable.

6.5.2

CH has collective labour agreement of PT Bumi Pratama Khatulistiwa period of 2018 – 2020. The agreement is ratified by Manpower and Transmigration Agency of Kubu Raya Regency through decree no KEP/840/HI/XI/2017 on 12 October 2018. This document is regulated about company and worker responsibilities, recruitment process, promotion and demotion, work time management, payment system, social insurance, contract termination, and so on. Based on interview with the worker, it is known that they understand about worker's rights and obligation as written in agreement. It has been socialized to the worker by management representative.

Type of worker in PT BPK is temporary worker and permanent worker. All worker has received wages in accordance with applicable regulation. Company has a promotion plan for temporary worker and targeted for completion in September 2019. Daily worker that will be appointed as permanent worker is 82 workers. (OFI)

6.5.3 & 6.5.4

Based on field observation in housing complex in phase 4 of Division 2, it is known that company has been providing housing facilities, lighting and water, places of worship, school buses, clinics and educational facilities (kindergarten, elementary). Based on interview with the residents, it is known that there is no complaint related to housing facilities. The facilities provided by the company is adequate. And also it is known that one house is occupied by one family and the condition of housing is still in good shape. Adequate food supply can be accessed by the worker from nearest market.

Status: Company

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 policy related to form and join worker union is listed Human Rights Policy which states that the company gives the right to associate to all workers. The policy is written in Bahasa Indonesia. Based on interview with representative of Bipartite cooperative, it is informed that company is giving freedom for worker to express their opinion. And also, Company did not give any intervention related to worker union activity. Worker union has registered to Labor and Transmigration Agency of Kubu Raya Regency with registration number 560/01/SP-SB/Nakertrans-B.2/I/2019 on 22 January 2019.

6.6.2

The Bipartite conducted internal meeting periodically or where there is an issue with company. There are meeting documentation, such as minutes of meeting on 22 June 2019 about work leave and worker housing maintenance. The documentation is available in office unit and available for member if they were asking.

Status: Comply

6.7		
Children are not employed or exploited.		
6.7.1		
<p>Company has child protection policy signed by Chief Sustainability Officer of Wilmar International in November 2017. Based on the policy, the minimum age for new worker recruitment is 18 years old. Based on document review and field observation, there are no workers under 18 years old. Based on public consultation with Labor and Transmigration Agency of Kubu Raya Regency and field observation in estate and POM, there is no issue regarding child labor. Based on interview with worker in estate and POM, they know the minimum age to work in the company. Based on field observation in estate, auditors did not sighted any harvester accompanied by their wife or children.</p>		
	Status: Comply	
6.8		
Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.		
6.8.1 & 6.8.2		
<p>Company has policy related to nondiscrimination and equal opportunity (September 2010) which explained that Wilmar did not discriminate against gender, race or ethnicity, disability, sexual orientation, age, or belief. This policy also explains the recruitment process starting from job vacancy announcements, recruitment and selection, training, career development, and service conditions, and personnel records. Based on field observation and interview with spraying and manuring female worker, it is known that there is no issue or complain from worker regarding discrimination. Also, information from committee of worker union stated that there is no issue related discrimination. The workers that has been interviewed is came from various social origin, race, and religion.</p>		
6.8.3		
<p>Company kept the personal file of each worker in estate office. Based on interview with management, the recruitment is conducted through the company requirement. The new recruitment is conducted in accordance with the procedure. It is based on skill, capabilities, and health condition for all workers. Worker promotion, mutation or demotion is done through the employee performance assessment. Company showed documentation of employee promotion, such as appointment decree from temporary daily worker to permanent worker, No 007/BPK-HRR/SK/III/2019. Informatio about wages received, leave, and social insurance is explained in attachment of the decree.</p>		
	Status: Comply	
6.9		
There is no harassment or abuse in the work place, and reproductive rights are protected.		
6.9.1, 6.9.2, 6.9.3		
<p>Policies to maintain morality are included in the Sexual Harassment Policy, Violence and Reproductive Rights signed by the Plantation Head Group and CSR Head Group in June, 2014. The policy states that Wilmar will take appropriate steps to prevent incidents of sexual harassment, acts violence, and violation of reproductive rights and will be responsive and fair to reports of sexual harassment by maintaining their confidentiality. Based on interview with female worker in Estate, it is known that they understand the policy. It is also known that they understand the mechanism of complaint submission. Also, interview with committee of Gender Committee, it is known that there is no issue or complaint related to sexual harassment on the workplace.</p>		
<p>Company has formed gender committee for handling the harassment issue around female workers. Complaint can be submitted to board of bipartite cooperation, gender committee, or their foreman. Based on interview with the board of gender committee, the company provides the female worker with menstrual leave, pregnant and nursing leave for about 3 months. Pregnant and nursing female worker is prohibited to work related to chemical. And also, Company give special breast feeding time for female worker, but prohibit the worker from working with chemical material.</p>		
	Status: Comply	
6.10		
Growers and mills deal fairly and transparently with smallholders and other local businesses.		

6.10.1 & 6.10.2

Company showed "FFB Price Document" from Plantation Agency of Kalimantan Barat Province for period of June 2019. The document FFB price has been known by scheme smallholder farmers by online or through mill management. Based on interview with representative of Tuah Jubata Cooperative and FFB supplier, it is known that there is no complaint about FFB price.

6.10.3 & 6.10.4

The company has an agreement contract with cooperative and FFB Supplier. Each contract document, signed by both parties as evidence that a work agreement has been agreed. Contract agreement documents are kept by both parties, which will be used as legal references. The agreements explains the criteria for FFB grading, payment, and signed by both parties

Based on interviews with contractors and FFB supplier, payments are made on time. For example payment documentation for PT Indi Mandiri Globality period of April 2019. Payment is made in accordance with the FFB price. There are no complaints related to late payments.

Status: Comply

6.11

Growers and millers contribute to local sustainable development wherever appropriate.

6.11.1

The CH prepared the CSR program based on inputs received from community around.

CSR program and documentation of its implementation is showed during the audit. The activities implemented until August 2018, such as:

- Assistance of Mosque development in Mega Timur Village on January 2018
- Assistance for basic food in Sungai Malaya Village on 27 January 2019
- Funds trench normalization in Sungai Malaya Village in 30 May 2018
- And others

The company also held meetings with the Sungai Malaya, Mega Timur, and Sungai Enau village government on 26 – 27 July 2018 to optimize and remain the target of community development. One of the discussions from the meeting was a house renovation program in Pematang Limau Village.

6.11.2

The company has contributed to increasing the productivity of smallholder farmers, for example providing training for Tuah Jubata cooperative, such as training of manuring standard on 9 April 2018 and training about OHS procedure, company's policy, and PPE usage on 22 April 2019.

Status: Comply

6.12

No forms of forced or trafficked labour are used.

6.12.1; 6.12.2; 6.12.3

Based on document review, field observation, and interviews with worker and stakeholders, it is known that there is no migrant labor, including forced labor and illegal labor. The recruitment is done according to the company's procedure. All workers have work agreement that explain about the obligation and rights of the worker, and other provision. They work based on the contract and work order. Based on field observation and interviews with the workers in Estate and Mill, it is known that there is no discrimination among them. They came from local and nonlocal worker. Based on field observation in estate, auditors did not sighted any harvester accompanied by their wife or children. Based on interview bipartite cooperation member, there is no issue related to force labor.

Based on interview with the harvester and committee of worker union, there were no complaint about working hours. The payment is based on tonnage. If they did not get the tonnage after working hours is out, they will be paid by daily payment.

	Status: Comply	
6.13		
Growers and millers respect human rights		
6.13.1		
<p>Company has policy on human rights issued in June 2014. The policy explains that the company will adhere to the principles related to respecting and protecting human rights. It has been socialized to the workers and contractor, for example on 17 June 2010 to 30 mill workers. As for socialization to contractor, it is written in work agreement with Company. Based on interview with worker in estate and mill, they know and understand about workers' rights. And also, from consultation with internal stakeholder (worker union), it is known that there is no complaint related to human rights violation. If there was a complaint, the complaint can still be resolved by amicable way between employees.</p>		
	Status: Comply	
PRINCIPLE #7 Responsible development of new plantings		
7.1		
A comprehensive and participatory independent social and environmental assessment is undertaken prior to establishing new plantings or operations, or expanding existing ones, and the results incorporated into planning, management and operations.		
7.1.1; 7.1.2; 7.1.3		
<p>There is no new planting since 1 January 2010, the planting year of 2010 and above is replanting. During the Surveillance 1 audit, the company did not develop new areas. An independent social and environmental impact assessment (SEIA), undertaken through a participatory methodology including the relevant affected stakeholders are still applicable and documented. Please refer to Criteria 5.1 and 6.1</p>		
	Status: Comply	
7.2		
Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.		
7.2.1 and 7.2.2		
<p>The results of document review, field visits and interviews found that company did not expand or conduct new planting since the last assessment (ASA-1).</p>		
	Status: Comply	
7.3		
New plantings since November 2005, have not replaced primary forest or any area required to maintain or enhance one or more High Conservation Values.		
7.3.1, 7.3.2; 7.3.3; 7.3.4; 7.3.5		
<p>There is no new planting since 1 January 2010, the planting year of 2010 and above is replanting. During the Surveillance 1 audit, the company did not develop new areas. Based on previous assessments, it has been explained that reporting template for disclosure of areas cleared without prior HCV Assessment since November 2005 has been submitted to RSPO on 8 Dec 2015 (directly). In the summary of raw liability described that total area of raw liability as 23.02 Ha, time clearance November 2005 – 30 November 2007. LUC Analysis has been conducted in collaboration with AKSENTA on August 2015, the total area of raw liability Ha 23.02 Ha and the total area of conservation liability 0 Ha.</p>		
<p>Analysis of land cover changes conducted using landsat imaginary with 30m spectral resolution of Oct 2005, Sept 2007, Jan 2010, August 2014 and August 2015. The land cover is reclassified into vegetation coefficients as coefficient 0 (according to the RaCP document).</p>		
<p>PT BPK has sent and reported the LUCA to the RSPO and has been addressed by the RSPO (rspocompensation@rspo.org) on August 9, 2016 that explains that the LUCA is marked as Pass with Clarification. On 29 September 2016 has been declared that the LUC Aanlysis has been endorsed by the RSPO, and described in the</p>		

email (rspocompensation@rspo.org) that the final liability for PT BPK is 0 Ha, no compensation plan is needed.		
	Status: Comply	
7.4		
Extensive planting on steep terrain, and/or on marginal and fragile soils, is avoided.		
7.4.1 and 7.4.2		
The results of document review, field visits and interviews found that company did not expand or conduct new planting since the last assessment (ASA-1).		
	Status: Comply	
7.5		
No new plantings are established on local peoples' land without their free, prior and informed consent, dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.		
7.5.1		
Based on documents review, interview and field visits, it is known that the Company did not expand the operational area and there is no more land clearing activity after 2005.		
	Status: Comply	
7.6		
Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their free, prior and informed consent and negotiated agreements.		
7.6.1, 7.6.2, 7.6.3, 7.6.4, 7.6.5, 7.6.6		
Based on documents review, interview and field visits, it is known that the Company did not expand the operational area and there is no more land clearing activity after 2005.		
	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		
Certification Holder has and implemented a zero burning policy issued on December 5, 2013. The policy does not allow burning activities when preparing land for new planting, replanting and or all other activities.		
	Status: Comply	
7.8		
New plantation developments are designed to minimise net greenhouse gas emissions.		
7.8.1; 7.8.2		
There is no new development since January 2015 for entire areas on PT BPK. Existing GHG calculation has been described on criteria 5.6		
	Status: Comply	
PRINCIPLE #8 Commitment to continuous improvement in key areas of activity		
8.1		
Growers and millers regularly monitor and review their activities and develop and implement action plans that allow demonstrable continuous improvement in key operations.		
8.1.1		
The company has implemented the RSPO Internal Audit on 27-28 May 2019 and management review conduct annually at 15 June 2019. All aspect regularly reviewing and evaluation to ensure effectiveness for improvements such in best		

management practices aspect which in pest monitoring and evaluation known that biological control can managed the pest population. In social aspect known that CSR program and participatory SIA can effectively manage the social impacts etc. The others improvement that implemented will describe below.

Aspects of Best Management Practices:

The Company has implemented a commitment to continuous improvement, including:

- Control of rat pests using owl predators (*Tyto alba*).
- Biological leaf caterpillar pests control by planting and maintaining (conservation) beneficial plants, such as *Antigonon leptopus*, *Cassia cobanensis*, and *Turnera subulata*.
- Since 2013, certification holder is no longer using *Paraquat*.

Environmental

- The company has routinely carried out management and monitoring of environmental impacts and reported to relevant agencies.
- The company treats river water as drinking water.

	Status: Comply	
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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>The organization take legal ownership and physically handles RSPO certified sustainable oil palm products. The entire area, mill and storages are owned by the organisation and all processing from FFB to CPO/PK are done by Bumi Pratama Khatulistiwa Palm Oil Mill. The organization sold their certified products to PT. Wilmar Cahaya Indonesia, Tbk – Pontianak, which has been certified for RSPO Supply chain certification standard (Certificate number: INTERTEK-RSPO-0077555, 2 July 2018). The site does not use any contractor for handling certified products, CPO and PK transporter are under contract with buyer (PT. Wilmar Cahaya Indonesia, Tbk – Pontianak).</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>The site does not buy CPO/PK from any RSPO licensed traders or distributors. CSPO and CSPK are produced from certified FFBs processed that supplied from its own estates.</p>
	Status: Comply
5.1.3	<p>Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform.</p> <p>The parent company are member of RSPO (Wilmar International Ltd):</p> <ul style="list-style-type: none"> - Number of RSPO membership: 2-0017-05-000-00 - RSPO IT Platform of Bumi Pratama Khatulistiwa Palm Oil Mill: RSPO_ PO1000004335
	Status: Comply
5.1.4	<p>Processing aids do not need to be included within an organization's scope of certification.</p> <p>Parent company or site has no processing aids</p>
	Status: Comply
5.2	Supply chain model
5.2.1	<p>The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.</p> <p>The organization has applied mass balance supply chain model correctly and there is no declassification. The mill received FFB from certified area (Bumi Pratama Khatulistiwa Estate) and received from uncertified sources such PT Buluh Cawang Plantation, Plasma of Bumi Pratama Khatulistiwa, Plasma of Buluh Cawang Plantation and independent suppliers.</p>

	Status: Comply
5.2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.
	The organization has applied mass balance supply chain model only
	Status: Comply
5.3	Documented procedures
5.3.1	The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified.
	<p>The Mill has the documents of supply chain procedures for Mass Balance models No. document SOP/BPK-ADM/007/ 0218 Rev 2 dated February 2018. The procedures established and covering all elements of the supply chain model requirements, records and reports of compliance with supply chain requirements including training records. The procedure is according to RSPO SCCS 21 November 2014, revised 14 June 2017.</p> <p>The procedures also identified role of implementation responsibility persons that trained. Responsible person in the whole process of supply chain: Security (registrar of all FFB expeditions and dispatch of CSPO/CPO), Weigh operators (weighing in all received FFB and shipping products), Logistics (calculation results of CSPO/CPO production, dispatch, reports of the products delivery and traceability report), Head of Administrator (acceptance control of FFB and CSPO/CPO, FFB acceptance report, dispatch, product delivery reports and traceability reports), Mill Head. Based on field observation at Weighbridge station and interview with sampled person in the Mill, the operator has knowledge and able to demonstrate the implementation of SCCS.</p>
	Status: Comply
5.3.2	The site shall have a written procedure to conduct annual internal audit
	The Procedure to conduct annual internal audit are describe in SOP No. SOP/BPK-EHS/018/0818 dated August 2018, which describes the internal audit conducted annually. Internal audit of SCCS conforms to the requirements in the RSPO SCCS and the RSPO market communications and claims documents and effectively implements and maintains the standard requirements. The last internal audit are conduct at 27-28 May 2019 with no finding.
	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
	Bumi Pratama Khatulistiwa Mill has not purchased CSPO or CSPK. The mill received FFB from certified and uncertified sources. Based on documents verification of FFB receives for example on May 2019 are known that all data such as name, address, date of transaction, date of issued claim, transport documentation were match without any non compliance.
	Status: Comply
5.4.2	The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents
	Bumi Pratama Khatulistiwa Mill has not purchased CSPO or CSPK. However The mechanism of handling non-conforming oil palm products of FFB received (certified or non-certified) has describe that non-conforming oil palm products as a false in FFB received notes (certified or non certified) and regarding of FFB received records. To handling on this non-conforming are to corrected the record base on FFB source (certified or non certified areas) and monitored by mass balance record documents.

	Status: Comply
5.5	Outsourcing activities
5.5.1	<p>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.</p> <p>Bumi Pratama Khatulistiwa Mill are not outsourced activities to independent third parties, either subcontractors for storage, transport or other outsourced activities.</p>
	Status: Comply
5.5.2	<p>Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <ol style="list-style-type: none"> The site has legal ownership of all input material to be included in outsourced processes; 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. 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 <p>Bumi Pratama Khatulistiwa Mill are not outsourced activities to independent third parties. CPO and PK transporter are under contract with buyer (PT. Wilmar Cahaya Indonesia, Tbk – Pontianak), which has been certified for RSPO Supply chain certification standard (Certificate number: INTERTEK-RSPO-0077555, 2 July 2018).</p>
	Status: Comply
5.5.3	<p>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.</p> <p>There is no contractors used for the processing or physical handling of RSPO certified oil palm products.</p>
	Status: Comply
5.5.4	<p>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</p> <p>There is no contractors used for the processing or physical handling of RSPO certified oil palm products.</p>
	Status: Comply
5.6	Sales and goods out
5.6.1	<p>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</p> <p>The site has product information provided in such as document of weighbridge ticket, delivery order and other invoices. Such as the CPO & PK delivery dated 24 June 2019. The informations that provided on the invoices are:</p> <ul style="list-style-type: none"> - The name and address of the buyer; - The name and address of the seller; - The loading or shipment / delivery date;

<ul style="list-style-type: none"> - A description of the product RSPO certified Mass Balance model - The date on which the documents were issued; - The quantity of the products delivered; - Any related transport documentation; - etc. 	
	Status: Comply
5.7	Registration of transactions
5.7.1 Supply chain actors who: <ul style="list-style-type: none"> • are mills, traders, crushers and refineries; and • take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable 	
Bumi Pratama Khatulistiwa Mill has registered all transactions in RSPO IT platform.	
	Status: Comply
5.7.2 The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform: <ul style="list-style-type: none"> • Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures. • Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually. • 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. 	
Transactions are registered in RSPO IT platform as for periods last year. Based documents that presented, during June 2018 to May 2019 there is 2,897.64 MT PK and 13,437.75CPO sold as RSPO certified product. For example on 31 May 2019 sold to buyer (PT Wilmar Cahaya Indonesia – Pontianak) there is CSPO 1,077.43 MT and CSPK 224.92 MT	
	Status: Comply
5.8	Training
5.8.1 The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff	
SCCS training are planned annually, for example training on 29 May 2019.	
	Status: Comply
5.8.2 Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed	
The company has provided training at 29 May 2019 for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements, such as: processing clerk, grading operator, weighbridge operator,	

documents controller, etc. Based on interview at weighbridge station is known that the operator and SCCS person in charge have understand the RSPO supply chain procedures.

Status: Comply

5.9 Record keeping

5.9.1

The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements

The site has maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements. Thoose are describe in this ASA-2 report on section of Module E CPO Mills - Mass Balance Requirements.

Status: Comply

5.9.2

Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock

The retention times for all records and reports are keep in minimum 2 years According to the procedure of Making, Controlling And Changing Documents (No. SOP/BPK-DC/001/0118 dated on January 2018). The mill have RSPO certified in October 2017 and based on documents verification it's concluded that the record of supply chain are available since the mill was certified.

Status: Comply

5.9.3

The organization shall be able to provide the estimate volume of palm oil / palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.

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

Period	CPO production (MT)		Total	CSPO Dispatch (MT)		
	Cert	Non Cert		RSPO	Other scheme	Conventional
July 2018	2360.929	2133.538	4494.467	-	-	-
August 2018	1,236.091	2,134.953	3,371.044	1,801.095	-	-
September 2018	1,296.837	1,884.470	3,181.307	2,198.905	-	-
October 2018	1,196.384	2,008.874	3,205.258	1,000.000	-	-
November 2018	1,038.820	2,152.403	3,191.223	1,500.000	-	-
December 2018	967.115	1,860.150	2,827.265	1,400.000	-	-
January 2019	1,078.718	1,963.456	3,042.174	1,075.000	-	-
February 2019	936.855	1,253.626	2,190.481	850.000	-	-
March 2019	910.275	1,159.617	2,069.892	1,100.000	-	-
April 2019	983.303	1,084.881	2,068.184	300.000	-	-
May 2019	956.947	1,052.452	2,009.399	1,541.625	-	-
June 2019	551.803	526.334	1,078.137	671.127	-	-
	13,514.077	19,214.754	32,728.831	13,437.752	-	-

Period	PK production (MT)		Total	CSPK Dispatch (MT)		
	Cert	Non Cert		RSPO	Other scheme	Conventional
July 2018	532.257	828.323	1360.58	-	-	-
August 2018	261.699	448.990	710.689	365.030	-	-
September 2018	293.397	423.945	717.342	550.530	-	-
October 2018	264.491	446.090	710.581	284.440	-	-
November 2018	243.206	503.284	746.490	100.000	-	-

December 2018	229.647	452.948	682.595	350.000	-	-
January 2019	265.902	481.819	747.721	275.000	-	-
February 2019	235.255	313.310	548.565	225.610	-	-
March 2019	188.678	239.873	428.551	166.720	-	-
April 2019	228.543	253.448	481.991	207.670	-	-
May 2019	215.204	239.772	454.976	224.980	-	-
June 2019	106.048	104.354	210.402	147.660	-	-
	2,939.018	4,297.080	7,236.098	2,897.640	-	-
	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 site doesn't applied a 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 site doesn't applied a 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. Based on announcement and transaction report documents review, it concluded that all RSPO certified products submitted are in compliance with the RSPO Rules on Market Communications and Claims.						
	Status: Comply					
5.12	Complaints					
5.12.1 The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints. Procedures for stakeholders complaints established in the document No. SOP/BPK-ADM/003/0218 Revision 01 of the effective date of February 2018. Based on complaints document verification is known that there is no complaint regarding SCCS for last a year.						
	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 The company has management review conduct annually at 15 June 2019.						

	Status: Comply
5.13.2 The input to management review shall include information on: <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard. • Customer feedback. • Status of preventive and corrective actions. • Follow-up actions from management reviews. • Changes that could affect the management system. • Recommendations for improvement. 	
The content of management review related to SCCS are the result of internal audit, customer feedback, work process, preventive and corrective actions, follow up actions and recommendations for improvement.	
	Status: Comply
5.13.3 The output from the management review shall include any decisions and actions related to: <ul style="list-style-type: none"> • Improvement of the effectiveness of the management system and its processes. • Resource needs. 	
The Management review are include the decision and actions related to improvement of the effectiveness of the management system and its processes and Resource needs.	
	Status: Comply

3.2.2. Module E – CPO Mills: Mass Balance Requirements

Clause	Requirement												
E.1	Definition												
E.1.1	<p>Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and sales volume of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p> <p>SCSS module used in BPK Mill is Mass Balance (MB), because the mill receives FFB from the estate that has been certified by RSPO and non-certified RSPO.</p>												
	Status: Comply												
E.2	Explanation												
E.2.1	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the CB in the public summary of the P&C certification report. For an independent mill, the estimated tonnage of CPO and PK products must be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p> <p>Estimate product certified CPO and PK for period 18 October 2019 – 17 October 2020 describe at this ASA-2 report (basic info 1.8.3). Actual tonnage in period for last year:</p> <table><tr><th>Products</th><th colspan="2">Tonnes/year</th></tr><tr><th></th><th>Estimate</th><th>Actual (until June 2019)</th></tr><tr><td>CSPO</td><td>13,709</td><td>13,514.08</td></tr><tr><td>CSPK</td><td>3,164</td><td>2,939.02</td></tr></table>	Products	Tonnes/year			Estimate	Actual (until June 2019)	CSPO	13,709	13,514.08	CSPK	3,164	2,939.02
Products	Tonnes/year												
	Estimate	Actual (until June 2019)											
CSPO	13,709	13,514.08											
CSPK	3,164	2,939.02											
	Status: Comply												
E.2.2	<p>The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform).</p> <p>RSPO IT Platform member registration number: RSPO_ PO1000004335</p> <p>Transactions are registered in RSPO IT platform as for periods last year. Based documents that presented, during June 2018 to May 2019 there is 2,897.64 MT PK and 13,437.75CPO sold as RSPO certified product. For example on 31 May 2019 sold to buyer (PT Wilmar Cahaya Indonesia – Pontianak) there is CSPO 1,077.43 MT and CSPK 224.92 MT</p>												
	Status: Comply												
E.3	Documented procedures												
E.3.1	<p>The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:</p> <p>a. Complete and up to date procedures covering the implementation of all the elements in these requirements;</p> <p>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</p>												

awareness of the site procedures for the implementation of this standard.

The Mill has the documents of supply chain procedures for Mass Balance models No. document SOP/BPK-ADM/007/ 0218 Rev 2 dated February 2018. The procedures established and covering all elements of the supply chain model requirements, records and reports of compliance with supply chain requirements including training records. The procedure is according to RSPO SCCS 21 November 2014, revised 14 June 2017.

The procedures also identified role of implementation responsibility persons that trained. Responsible person in the whole process of supply chain: Security (registrar of all FFB expeditions and dispatch of CSPO/CPO), Weigh operators (weighing in all received FFB and shipping products), Logistics (calculation results of CSPO/CPO production, dispatch, reports of the products delivery and traceability report), Head of Administrator (acceptance control of FFB and CSPO/CPO, FFB acceptance report, dispatch, product delivery reports and traceability reports), Mill Head. Based on field observation at Weighbridge station and interview with sampled person in the Mill, the operator has knowledge and able to demonstrate the implementation of SCCS.

Status: Comply

E.3.2
The site shall have documented procedures for receiving and processing certified and non-certified FFBs

SOP traceability of CPO and PK Model MB, No. document SOP/BPK-ADM/007/ 0218 Rev 2 dated February 2018, describes the responsible PIC, references, the reception process of FFB (separating record keeping of certified and non-certified), processing of FFB and CPO/PK production (recorded in the 3 monthly basis with appropriate ratio calculation), shipment of CPO certified and PK certified (should be of positive stock, specify RSPO certificate number on the sales documents) and palmtrace data entry.

In addition, Mill has FFB reception procedures, namely SOP/BPK-SRT/002/0118 dated January 2018, which describes the process of receiving and verifying of FFB on BPK POM:

- FFB delivery document checked by security
- Security and weighbridge operator checks the list of certified and non-certified supplier
- For FFB unclear status shall be segregated and reported for investigation
- The weighbridge clerk recording FFB received, separated by FFB quantity of certified and non-certified, will be input into MB daily Report

Based on interview with weighbridge operator and logistic clerk, it is known that the personnel can explain the source of uncertified and certified FFB.

Status: Comply

E.4
Purchasing and goods in
E.4.1
The site shall verify and document the volumes of certified and non-certified FFBs received.

The site has verified and documented the volumes of certified and non-certified FFBs received. Certified and non-certified FFB received period of 12 Months:

Month	FFB (ton)		
	RSPO Certified	Non Certified	Total
July 2018	7,945.64	11,304.14	19,249.78
August 2018	6,696.81	11,643.08	18,339.89
September 2018	7,273.46	10,348.56	17,622.02
October 2018	6,589.96	11,111.13	17,701.09
November 2018	5,682.35	11,703.12	17,385.47
December 2018	5,489.70	10,313.63	15,803.33

January 2019	5,993.29	11,192.29	17,185.58			
February 2019	5,293.84	6,926.90	12,220.74			
March 2019	5,074.04	6,510.58	11,584.62			
April 2019	5,475.66	6,065.50	11,541.16			
May 2019	5,475.41	5,770.12	11,245.53			
June 2019	3,271.19	3,462.76	6,733.95			
Total	70,261.35	108,807.09	179,214.566			
.						
	Status: Comply					
E.4.2						
The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.						
There is no overproduction of projected volume on license periods 18 October 2018 – 17 October 2019. Actual tonnage in periods for last year						
Products	Tonnes/year					
	Estimate	Actual (until June 2019)				
CSPO	13,709	13,514.08				
CSPK	3,164	2,939.02				
.						
	Status: Comply					
E.5	Record keeping					
E.5.1						
a. The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.						
b. All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.						
c. The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a site is allowed to sell short. (i.e. product can be sold before it is in stock.)						
FFBs, CSPO and CSPK produced and/or claimed records are kept in minimum 12 months. Record of all certified palm oil / palm kernel oil volumes purchased (input) and claimed (output) for period of twelve months:						
Period	CPO production (MT)		Total	CSPO Dispatch (MT)		
	Cert	Non Cert		RSPO	Other scheme	Conventional
July 2018	2360.929	2133.538	4494.467	-	-	-
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March 2019	910.275	1,159.617	2,069.892	1,100.000	-	-
April 2019	983.303	1,084.881	2,068.184	300.000	-	-
May 2019	956.947	1,052.452	2,009.399	1,541.625	-	-
June 2019	551.803	526.334	1,078.137	671.127	-	-
	13,514.077	19,214.754	32,728.831	13,437.752	-	-
.						
Period	PK production (MT)		Total	CSPK Dispatch (MT)		
	Cert	Non Cert		RSPO	Other scheme	Conventional
July 2018	532.257	828.323	1360.58	-	-	-
August 2018	261.699	448.990	710.689	365.030	-	-

September 2018	293.397	423.945	717.342	550.530	-	-
October 2018	264.491	446.090	710.581	284.440	-	-
November 2018	243.206	503.284	746.490	100.000	-	-
December 2018	229.647	452.948	682.595	350.000	-	-
January 2019	265.902	481.819	747.721	275.000	-	-
February 2019	235.255	313.310	548.565	225.610	-	-
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April 2019	228.543	253.448	481.991	207.670	-	-
May 2019	215.204	239.772	454.976	224.980	-	-
June 2019	106.048	104.354	210.402	147.660	-	-
	2,939.018	4,297.080	7,236.098	2,897.640	-	-
Status: Comply						

3.3 Conformity Checklist of Certificate and Trademark Use

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

3.4 Summary of RSPO Partial Certification.

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

Wilmar International Ltd Time Bound Plan (TBP) is explained in point 1.10. Wilmar International Ltd has informed the TBP progress, MUTU has considered that Wilmar International Ltd is complied with the RSPO requirement for TBP. The Time Bound Plan was revised and declared by Wilmar International Ltd on July 2018.

MUTU has verified partial certification for un-certified unit's subsidiary of Wilmar International Ltd based on their Time Bound Plan. There are seven (7) uncertified mills and sixteen (16) uncertified estates of Wilmar International Ltd. MUTU Auditor verified positive assurance against the company internal audit and supporting evidence as well as any information from others sources.

MUTU Auditor has verified company partial certification and concludes that:

- There are no significant land conflicts which have not been declared above.
- The company has follow RSPO requirement related to New Planting Procedure and Remediation and Compensation Procedure.
- There are 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
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p>Yes and positive assurance is produced for these units.</p> <p>Auditor verification</p> <p>There is internal audit produced for</p> <ul style="list-style-type: none"> - PT Agronusa Investama Pahauman - PT Agro Palindo Sakti 2 - PT Musi Banyuasin Indah - PT Sinarsiak Dianpermai - PT Agroindo Indah Perkasa 2 <p>There is some non-conformance find in internal audit and the company has produced the positive assurance for these units.</p>
2.1.2	<p>No replacement after dates defined in Nis Criterion 7.3 of:</p> <ul style="list-style-type: none"> • Primary forest. • Any area identified as containing High Conservation Values (HCVs). • Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3. 	<p>WILMAR International Ltd has submitted liability disclosure to RSPO on 31 July 2014 and LUCA template on 3-8 March 2015</p> <ul style="list-style-type: none"> - PT Agronusa Investama Pahauman, LUCA document was verified by RSPO on 1 Sept 2015. The 2nd LUCA verification document was on 2nd Nov 2015 with result of PASS WITH CLARIFICATION. - PT Bhumi Pratama Khatulistiwa, Submitted liability disclosure to RSPO on 8 Dec 2015 and LUCA template on August 2015. The

		<p>final RSPO endorsement from RSPO compensation on 29 September 2016 is 0 ha therefore there is no compensation plan required</p> <ul style="list-style-type: none"> - PT Agro Palindo Sakti 2, LUCA doc was verified by RSPO on 1 Sept 2015. The 2nd LUCA review was on Dec 2016 with result of PASS - PT Musi Banyuasin Indah, 0 liability confirmed by RSPO Compensation. There is no planting after 1 November 2005 - PT Sinarsiak Dianpermai, 0 liability confirmed by RSPO Compensation. There is no planting after 1 November 2005 - PT Agroindo Indah Perkasa 2, 0 liability confirmed by RSPO Compensation. There is no planting after 1 November 2005 <p>Auditor verification Auditor has verified the supporting evidence of above the company statement. The above statement in accordance with the supporting evidence provided.</p>
2.1.3	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>No new planting/land clearing after 1st January 2010.</p> <p>Auditor verification</p> <ul style="list-style-type: none"> - PT Agronusa Investama Pahauman, The first planting year was in 1999. The latest land clearing was in 2009 based on: LUCA analysis 2009 where the area was already bare land area. LUCA has been submitted to RSPO as part of company disclosure requirement. - There is no new planting after 1st January 2010 for, PT Bumipratama Khatulistiwa, PT Agro Palindo Sakti 2, PT Musi Banyuasin Indah, PT Sinarsiak Dianpermai, PT Agroindo Indah Perkasa 2
2.1.4	Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	<p>There is no land conflicts.</p> <p>Auditor verification There is no information from public source and RSPO website on any land conflict for uncertified unit of the group subsidiaries.</p> <p>Based on the company record there is documentation on land compensation recapitulation updated on 1 October 2007, participatory mapping, agreement letter on compensation between company and land owner, land owner identity and procedure on</p>

		compensation technical guidance SOP 001/WIP-KB/(0)/0610 dated June 2010.
2.1.5	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	<p>There is no labor disputes.</p> <p>Auditor verification There is no information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries.</p> <p>The company has mechanism to handle employee complaint and grievance that is stated in SOP 005/WIP-KB/(0)/0610 for communication and consultation with community and SOP 004/WIP-KB/(0)/ 0610 on complaint and grivance mechanism and solving any dispute out off court.</p> <p>There is no list of employee and stakeholder complaint and grievance.</p>
2.1.6	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	<p>Yes, there is process for land legality.</p> <p>Auditor verification PT Agronusa Investama Pahauman</p> <ul style="list-style-type: none"> - The continues changing on PIPIB map. In accordance to PIPIB 10 there is no area of the company (based on location permit) that is in the moratorium area. When PIPIB 11 released, some area of the company is in the updated peat moratorium map. <p>PT Agro Palindo Sakti 2</p> <ul style="list-style-type: none"> - There is an obstacle on processing HGU is before continuing the HGU process, the company has to complete the requirement for 20% area allocation for smallholder. Based on BupatiSanggau Decree No. 137 year 2011 dated 25 March 2011 for 623 ha of smallholder scheme for 2 koperasi of Batu Ceramin and and Maju Bersama. Later, koperasi Maju Bersama split into Koperasi Maju Bersama and Koperasi Harapan Baru. And Koperasi Harapan Baru wants to take about 136 ha within company proposed HGU area. The company needs to resolve this issue first before be able to continue HGU process. <p>PT Musi Banyuasin Indah</p> <ul style="list-style-type: none"> - Overlay the map of land use with attachments Ministerial Decree No. SK.822/Menhut-II/2013 PT MBI entered in production forest area. - Planting outside HGU Kebun Sei Selabu (block 010, 024 and 027).

		<p>Explanation management unit following the legal department still perform continuous coordination with the government while waiting for a change of government decisions regarding the status of the area.</p> <p>PT Sinarsiak Dianpermai</p> <ul style="list-style-type: none"> - HGU 1,002 Ha on process - Status of Other Use Areas based on Appendix SK 878 / Menhut-II / 2014 dated September 29, 2014 and letter no. S.160 / BPKH.XIX-3/2016 dated March 31, 2016 <p>Explanation management unit as follows:</p> <ul style="list-style-type: none"> - Disagreement between the ministry of forestry by the Riau provincial government on the status of land PT SSDP (between the status of forest and APL), which led to the process of making the concession inhibited. - There are some estate areas around the Mill that does not have permission locations. The process of acquiring a location permit was hampered due to the reasons in point 1 as well. - The legal department is still doing continuous coordination with the government while waiting for a change of government decisions. <p>PT Agroindo Indah Perkasa 2</p> <ul style="list-style-type: none"> - There is HGU on propose.
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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

NCR No.	: 2018.01	Issued by	: Muhammad Rinaldi
Date Issued	: 31 August 2018	Time Limit	: 30 November 2018
NC Grade	: Minor Upgrade to Major	Date of Closing	: 10 November 2018
Standard Ref. & Requirement	2.2.2 Legal boundaries are demonstrated clearly and maintained. Specific Guidance: For 2.2.2: Grower should cease operations on land planted beyond the legally determined area and there should be specific plans in place to address such issues for associated smallholders.		
Evidence observed & Non-Conformance Description (filled by auditor): Based on the operational map overlay with the map of HGU No. 56-57 in 1989 and a cadastral map No. HGU 89-14.14-2014 and 90-14.14-2014, it is known that there are planted area outside the HGU in the form of the connecting road between the mill area and the plasma area which is still being carried out maintenance and harvesting. This is not in accordance with the specific guidelines of indicator 2.2.2 which states that "Plantation operations should be stopped on lands located outside legally designated areas".			
Root Cause Analysis (filled by organization audited): Planting is carried out as a road divider that has been compensated by PT Bumi Pratama Khatulistiwa and is actually not intended to be plant that is expected to produce results for plantation operations.			
Correction (filled by organization audited): <ul style="list-style-type: none">• Immediately stop operational activities in the road area along BPK Estate to POM (maintenance and harvesting)• Issued a management policy letter regarding the terminate of oil palm management on the connecting road between the mill area and plasma as long as ± 2500 meters.• Submission of a statement letter from the Estate Manager to terminate the management of oil palm management at the connecting road between the mill area and plasma as long as ± 2500 meters.			
Corrective Action (filled by organization audited): socializing information to field staff regarding management policy about the terminate of oil palm management on connecting roads between the mill area and plasma as long as ± 2500 meters.			
Assessor Evaluation and Conclusion (filled by auditor): Verification on 10 November 2018 The company shows some evidence of improvements including: <ul style="list-style-type: none">• Minutes of terminate of Oil Palm Management along the road leading to mill as long as ± 2500 meter which was issued on October 29, 2018 by the General Manager.• Statement from the Division Manager and Estate Manager regarding the termination of operations on oil palm trees along the road to the mill which was issued on November 1, 2018.• Socialization to Field conductors, field officers and employees on November 8, 2018 related to the termination of activities in the area along the road to the mill.			

Based on these explanations, this non-conformity is stated to be closed.

Verified by : **Muhammad Rinaldi**

NCR No.	2018.02	Issued by	Rizliani Aprianita Hsb
Date Issued	31 August 2018	Time Limit	30 November 2018
NC Grade	Major	Date of Closing	11 November 2018
Standard Ref. & Requirement	4.4.2 Protection of water courses and wetlands, including securing and maintaining appropriate riparian and other buffer zones, at the time of or prior to replanting shall be demonstrated.		
Evidence observed & Non-Conformance Description (filled by auditor): Based on the field visit at the Malaya riparian at block 10 A, it was found that there were activities of chemical applications in the area that had been designated as a buffer zone. This shows that the company has not yet protected the riparian in accordance with the HCV identification document			
Root Cause Analysis (filled by organization audited): - The barrier condition in the field were not clear - Employees do not understand riparian boundaries - Lack of monitoring schedules			
Correction (filled by organization audited): Install the Riparian boundary so that employees can see the riparian boundary directly and provide a rope when doing spraying and manuring.			
Corrective Action (filled by organization audited): - Providing information to all employees, foremen and maintenance staff in charge - Review the HCV monitoring schedule and make improvements if needed (especially in terms of monitoring frequency)			
Assessor Evaluation and Conclusion (filled by auditor): Verification on 11 November 2018 The company showed evidence of improvement in the form of: <ul style="list-style-type: none"> - Minutes of HCV socialization and training on September 15, 2018 which was attended by 17 participants. There were attached documentation of HCV socialization and training along with attendance. - Evaluation of the schedule of HCV monitoring program of PT BPK. - Plan a schedule of HCV monitoring programs in 2019. Monitoring of riparian will be carried out every second week and HCV patrol will be carried out every fourth week. - Photograph of evidence of making boundaries of the riparian area using a rope along the boundary pole. - Socialization to 26 spraying and fertilizer workers on November 8, 2018 related to areas that are prohibited from applying for chemicals. 			

Based on these explanations, this non-conformity is stated to be closed.

Verification Auditor 4 August 2019

The company shows some evidence of improvement including:

- The list of present HCV management discussion meetings with community landowners on July 18, 2019 was attended by 7 representatives of community land tenants from the villages of Parit Salam, Parit Ampaning and Parit Kongsu.
- Minutes of the HCV area management agreement with the community dated 18 July 2019 which contained several points of agreement such as:
 - Willing to manage and maintain the border of the river by not applying pesticides with a distance of 5 meters.
 - Willing to not clear land by burning
 - The company is permitted to monitor HCV areas in areas worked by the community.
 - The community is not yet ready to not open up areas that are still forested, due to livelihood reasons.
- Minutes of HCV management agreement in the area worked by the community made by PT Bumi Pratama Khatulistiwa, on July 20, 2019 made by HCV Staff of PT BPK, known by Bina Mitra and approved by EM of PT BPK, with details of the agreement being the same as those made by community representative. (explained in point 2).

Verification Auditor 4 August 2019

The company shows evidence of improvement in the form of a management plan and HCV Monitoring (Community management area) for 2019-2024. In the management & monitoring plan, it is explained that HCV area block 048 & 049 in the form of secondary forest is carried out once a year, animal patrol & maintenance of signboard every 6 months and signboard installation is done in December 2019. For HCV area block 244, 048, 049 in the form of a natural river that turns into a ditch, socialization is carried out once a year, water quality monitoring & monitoring of the spray area are conducted every 6 months. As for evaluating the effectiveness of the protection of HCV functions contained in the area of Garapan will be conducted every 2 years.

Based on the root cause analysis, corrections, corrective actions corrected and the evidence that indicated a non-conformity was stated Closed, and will be observed again during the next audit.

Verified by : Rizliani Aprianita Hsb & Bayu Yogatama

NCR No.	: 2018.03	Issued by	: Rizliani Aprianita Hsb
Date Issued	: 31 August 2018	Time Limit	: 26 September 2019
NC Grade	: Minor Raised to Major	Date of Closing	: 26 August 2019
Standard Ref. & Requirement	: 5.2.5 Where HCV areas overlapped with an identified local community's land, there shall be evidence of a negotiated agreement that optimally safeguard their HCVs and the local community's rights		
Evidence observed & Non-Conformance Description (filled by auditor): Based on the results of interviews with Management and the results of the document verification of operational map, it is known that there is an HCV 3 area in the company area which is also controlled by the community, but the			

company has not shown enough evidence of the negotiated agreement to protect HCV.

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

When the HCV assessment was carried out, the area was included in the PT BPK concession, so it was included in the scope of the HCV consultant's assessment, while the field condition of the area was not managed by the company (controlled by the community).

Correction *(filled by organization audited):*

Made an MOU regarding the status of land \pm 145 Ha between the BPK and the community to respect each other's existence, where the land became definitive was no longer managed by the company.

Corrective Action *(filled by organization audited):*

Revised the management letter regarding the determination of HCV area to issue the HCV 3 from the PT BPK HCV area.

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

Verification June 27, 2019 (ASA-2)

Minutes from Representatives of Parit Tenaga Baru, Sei Enau Hamlet, Parit Kongs, Saga hamlet, Parit Ampening, Sungai Enau Village related to the problem solving process of community land with an area of \pm 145.17 Ha in Division II Block 048, 049, 244 Core HGU PT BPK. Date 4 February 2017 attended by 24 representatives from PT BPK and the Community. That concludes:

- Both parties agreed not to evict land and buildings in the area of disputed arable land.
- Both parties agreed that a participatory inventory would be conducted involving both parties and the government of the Sungai Enau Village on a land area of \pm 145.17 Ha in blocks 048, 049, and 244 where the timing of this activity would be determined later based on an agreement by both parties.
- Regarding the request from PT BPK to install 9 stakes on the disputed land in the process of resolving this problem, community representatives who have cultivated land have not yet been able to give a decision, bearing in mind that they will be discussed internally and the decision will be submitted to PT BPK in the next meeting, where the meeting schedule will be determined by both parties.

Minutes of determination of changes in PT BPK HCV area on 12 December 2018, represented by the General Manager of PT Bumi Pratama Khatulistiwa set.

- Policy to issue HCV area of \pm 4.28 ha from the management program of PT Bumi Pratama Khatulistiwa HCV area.
- Changes in the HCV area category as referred to in point (a) become community land.

Conclusion June 27, 2019

The company has not been able to show an agreement on HCV management that has been negotiated, or evidence of an ongoing effort to reach an HCV management agreement. Based on evidence of corrections, corrections and preventive actions submitted by the company, nonconformities have not been fulfilled.

Verified by : Bayu Yogatama

NCR No. : 2018.04 **Issued by** : Dwi Haryati

Date Issued	: 31 August 2018	Time Limit	: 30 November 2018
NC Grade	: Major	Date of Closing	: 23 November 2018
Standard Ref. & Requirement	6.5.2 Collective Labor Agreement/Company Regulation, in accordance with the manpower regulations, shall be available in understandable language; and explained by the management or Labor Union to the workers.		
Evidence observed & Non-Conformance Description (filled by auditor): Based on field visits as well as interviews with fertilizers in Block 127 A Division II and picker of lost fruits in Block 119 A Division I, it is known that working workers are not based on work agreements detailing payments and conditions of work. This is not in accordance with Law No. 13 of 2003 and / or Kepmenaker No. 100 of 2004			
Root Cause Analysis (filled by organization audited): 1. Provision of work contracts to third parties does not pay attention to aspects of employment, wage protection, welfare and work conditions, because previously the unit considers that the matter has been discussed by a third party and the workforce concerned is no longer included in the employment contract . 2. The employment agreement has not included a prohibition for harvesters to bring in auxiliary workers to pick loose fruit (unregistered workers).			
Correction (filled by organization audited): 1. Issue an internal memorandum regarding Harvesters responsible for quoting loose fruit and not allowed to bring unregistered workers to assist in harvesting work 2. To appoint fertilizer employees who have not been registered as daily paid workers of company			
Corrective Action (filled by organization audited): 1. Socialization of Internal Memorandum to harvesters regarding to Harvesters are responsible for quoting loose fruit and are not permitted to bring unregistered workers to assist in harvest work 2. Eliminating the cooperation with third parties to procure of fertilization worker and each employment must be done with a work agreement based on the Labor Regulation.			
Assessor Evaluation and Conclusion (filled by auditor): Verification on 23 November 2018 The company showed evidence of improvement in the form of: <ul style="list-style-type: none"> PT BPK's Internal Memorandum Number 219/DM-BPK/INT/XI/2018 dated November 15, 2018 regarding teh responsibility of loose fruit picker from Division Manager. The memorandum is addressed to all harvesters, harvest foremen, field harvesting conductors and field officers. The memorandum explains the provisions as follows: <ul style="list-style-type: none"> Harvesters are responsible for quoting loose fruit and collecting in production collecting area. In carrying out the responsibility to quote loose fruit, harvesters are not permitted to bring unregistered workers to assisst the loose fruit pick. Minutes of socialization of the Labor Regulation to field staff on November 17, 2018. This socialization explained the submission of internal memorandum to all field staff divisions 1 and 2 to ensure that there were no unregistered workers for loose fruit picker. The socialization was delivered to all staff of division 1 and division 2 as many as 19 people. Minutes of Socialization for harvesters on phase 1-4 (divisions 1 & 2), on November 17, 2018. The socialization is about the submission of internal memorandum concerning the prohibition of bringing unregistered workers to assist in the harvesting activity. Daily Work Agreement to 31 fertilizing workers. For example a work agreement Number 215 / DM-BPK / XI / INT 			

/ 2018 which describes several articles such as employment relations, type of work, number of work days and wages, insurance, OSH standards, health and treatment, work discipline, expiration of the agreement. The work agreement was signed by both parties and is known by the Labor and Transmigration Agency of Kubu Raya Regency.

Based on these explanations, this non-conformity is stated to be closed.

Verified by : **Dwi Haryati**

NCR No.	2018.05	Issued by	Muhammad Rinaldi
Date Issued	31 August 2018	Time Limit	30 November 2018
NC Grade	Major	Date of Closing	10 November 2018
Standard Ref. & Requirement	E.4.1 The site shall verify and document the volumes of certified and non-certified FFBs received.		
Evidence observed & Non-Conformance Description (filled by auditor):			
Based on overlay of operational map with cadastral field map No. 89-14.14-2014 and 90-14.14-2014, it is known that there are planting in non-certified area in the form of ± 0.73 Ha in block 51 and connecting road between the mill and plasma area, but the company has not shown the documentation of volume separation from non-certified FFB in that area.			
Root Cause Analysis (filled by organization audited):			
The company just found out that there are areas outside the scope of certification and FFB status are non-certified			
Correction (filled by organization audited):			
<ul style="list-style-type: none">- Review of the number of Non-Certified FFBs that have already been claimed as certified and revise them in the mass balance table (since the external audit last year until these findings were discovered)- Installation of marking in the field for marking areas with Non-Certified FFB- Arrangement in the field for handling non-certified FFB (socialization, differentiation of harvest time, separate the FFB sending letter and transportation for Non-Certified FFB).			
Corrective Action (filled by organization audited):			
Conduct a comprehensive review of the planting area to ensure that there are not areas with Non Certified FFB status (evidenced by the minutes of review of all planting area against legal land ownership)			
Assessor Evaluation and Conclusion (filled by auditor):			
Verification on 10 November 2018			
The company shows some evidence of improvement, including:			
<ul style="list-style-type: none">• Minutes and photos of the installation of boundaries of Non-certified areas and certified areas in Block 151 dated October 20, 2018• Minutes of Measurement of Non-certified areas in Block 151 with a total area of 3.32 Ha on September 13, 2018• Minutes on 05 November 2018 related to the Mass Balance Report period October 2017 until October 2018 by issuing production data in block 151. Based on these data, it is known that there is no overclaim after excluding the FFB production on non-certified area in block 151 and the stock is still positive with the amount the stock for CPO as much as 60,637 Kg and PK as much as 12,942 Kg.• Proof of slip and weighbridge ticket dated November 8, 2018 in block 151 which is marked as an uncertified			

area with a total of 42 bunches of FFB.

Based on these explanations, this non-conformity is stated to be closed.

Verified by	:	Muhammad Rinaldi
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3.5.2. Identification of Findings, Corrective Actions and Observations at ASA-2

NCR No.	: 2019.01	Issued by	: Hasiholan Sihombing
Date Issued	: 28 June 2019	Time Limit	: 26 September 2019
NC Grade	: MAJOR	Date of Closing	: 20 August 2019
Standard Ref. & Requirement	: 4.7.3 Records of training in Occupational Safety and Health (K3) programs (see 4.8) and Personal Protective Equipment (PPE) according to the results of hazard identification and risk analysis must be available to all workers.		
Evidence observed (filled by auditor): The company has a document Risk Analysis and Hazard Identification (HIRAC) and PPE Procedure (31 / WIP-KB / (0) / 2011) which explains that harvesting activity is equipped with PPE such as helmets, shoes, glasses and gloves. The company also conducts OHS monitoring / inspection, one of which is related to the use of PPE regularly every month. However, based on field observations in block 51 (near the mill security post), it was found that 2 harvesters did not use PPE (helmets, shoes, glasses and gloves) when harvesting. Based on that evidence, the company has not been able to effectively ensure that PPE is used by workers in the field			
Non-Conformance Description (filled by auditor): Based on this evidence, the company has not been able to effectively ensure that PPE is used by workers in the field.			
Root Cause Analysis (filled by organization audited): <ul style="list-style-type: none">- Lack of awareness and concern of workers regarding PPE functions.- Lack of company commitment in carrying out the rules in the use of PPE that has been agreed, especially regarding the application of sanctions.- There are no definitive sanctions set by companies for those who do not use PPE which has implications for the lack of awareness and concern of workers for the use of PPE.- Sanctions given when violating not applying the use of PPE are: giving a letter of reprimand, not being allowed to work on that day, and giving a warning letter (I, II, and III) up to termination of employment if always violating the procedure for applying PPE.			
Correction (filled by organization audited): <ul style="list-style-type: none">- Issues an internal memorandum regarding rules and sanctions regarding the use of PPE- Re-socialization of the rules on the use of PPE to all employees, including socialization regarding internal memorandum- Periodic PPE monitoring to employees by each foreman.- With the establishment and application of sanctions so that it is expected to EFFECTIVE be able to discipline workers for the use of PPE, in addition to the implementation of monitoring continues to be carried out continuously.			
Corrective Action (filled by organization audited): Evaluate the effectiveness of using PPE (in the P2K3 report). Evaluation of: <ul style="list-style-type: none">- Number of findings of PPE violations / monitoring of PPE usage,- Number of sanctions against PPE violators,- Number of work accidents related to negligence in using PPE- Check the minimum PPE stock in the warehouse- Analyzing the points above and seeing the correlation, it is expected that the correlation is positive, which means there is a decrease in violations of the use of PPE especially after applying sanctions to violators of PPE usage.			
Assessor Evaluation and Conclusion (filled by auditor):			

Verification on August 4, 2019

The company sends evidences of correction in the form of:

- An internal memorandum from the Estate Manager of PT BPK dated July 22, 2019, which reaffirmed the application / implementation of employee PPE when working.
- Minutes, attendance list and documentation on PPE internal memorandum policy to harvesters division 2 on 30 July 2019 and to harvesters division 1 on 28 July 2019.

Verification on August 20, 2019

The company has provided further explanations regarding the root cause analysis of non-conformities that arise as well as corrective actions so that the same non-conformities do not recur in the future. Based on this explanation, then this non-conformities has been closed and will be re-observed in the next assessment.

Verified by : **Hasiholan Sihombing**

NCR No.	: 2019.02	Issued by	: Leonada
Date Issued	: 28 Juni 2019	Time Limit	: ASA-3
NC Grade	: Minor	Date of Closing	:
Standard Ref. & Requirement	: RSPO Certification System Clause 4.1.3 The mill shall develop and implement a plan to ensure that 100% of scheme smallholders and scheme outgrowers are compliant with the standard within three years of the mill's initial certification. In monitoring compliance with this timeline, the CB shall raise an observation after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.		
Evidence observed (filled by auditor): PT. BPK cooperates with plasma plantations namely KUD Mekar Lestari (Agreement No. 23/BPK-DIR/PK-II/98 dated 12 February 1998) and KUD Buah Jubata (Agreement on 25 February 2015). These cooperation agreements start from plantation development and FFB delivery for one crop cycle (until the productivity of the plant is exhausted = ± 25 years. In terms of operational management carried out by the company as long as the credit of the farmer has not been paid off. At present, the KUD Mekar Lestari management has been handed back to the farmer because the credit has been paid off as shown in letter No. 162/MBB/HEB/2010 dated 11 May 2010 from CIMB Niaga Bank and letter No. 057/PLM-Ext/XI/12 dated 16 November 2012 from PT. BPK. The KUD Buah Jubata is still managed by PT BPK because credit has not been paid off. Since the BPK mill received a certificate in 2017, FFB from the two KUD's is still sent to the BPK mill due to being still bound by a contract. Based on the description, the two KUDs are obliged to take certification within 3 years after the Mill of PT. BPK gets RSPO certificate.			
Non-Conformance Description (filled by auditor): In this ASA-2, the company has not been able to show evidence of the implementation of compliance with RSPO standards for plasma plantations of PT. BPK (KUD Mekar Lestari and KUD Buah Jubata), then becomes a non compliance with the Minor grade			
Root Cause Analysis (filled by organization audited):			
Correction (filled by organization audited):			

Corrective Action <i>(filled by organization audited):</i>	
Assessor Evaluation and Conclusion <i>(filled by auditor):</i>	
Verified by	:

3.5.3. Opportunity for Improvement

No	Ref. Std.	Description
1	2.1.1	Addition coverage area of plantation bussines permit progress
2	2.2.1	The process of obtaining HGU extended (certificate No. 56 & 57)
3	4.4.4	Progres of extension of the permit to use surface water
4	6.1.4	Review of management and monitoring social plan by re-identified all social impact and arranged the management and monitoring plan.
5	6.5.2	Progress of appointment of temporary daily woker to permanen worker.

3.5.4. Noteworthy Positive Components


No	Ref. Std.	Description
1		The company's commitment in implementing partnerships with the smallholder
2		Good teamwork in providing data during the audit.
3		The company's commitment to implement the principles of sustainable palm oil management
4		Provision of drinking water for employees.
5		Company does not use herbicides with active ingredients of paracuat
6		Company use barcode system technology in recording FFB

3.6 Summary of Arising Issues from Public and Auditor Verification

Public Issues (Institution/ NGO/Community)	Auditor Verification
Tuah Jubata Cooperative (Plasma of PT BPK) <ul style="list-style-type: none"> • Being a plasma of PT BPK with a 50:50 system. • Since 2017, Tuah Jubata Cooperative has sent FFB to BPK POM. • Has 2 farmer groups with a total of 65 farmers. • Has an area of 98.25 ha. • Payments are made every 15th of the current month. • FFB price has updated every two weeks by the company, based on on decision from Plantation Agency of West Kalimantan Province. • There is no issues on FFB payment. • Tuah Jubata Cooperative has not participated in the RSPO audit. 	<p>The company has implemented the principles & criteria of RSPO on indicator 6.10.1, and 6.10.3.</p>
FFB Supplier (PT Kapuas Jaya Abadi) <ul style="list-style-type: none"> • Has been a FFB supplier for BPK POM since 2009. • Pricing is immediately notified to the FFB supplier by telephone and sms. • FFB pricing can change at any time. • Payments are made every week. • Payments to FFB supplier are made on time in accordance with the contract. • Communication between the FF supplier and the company is well established. 	<p>The company has implemented the principles & criteria of RSPO on indicator 6.10.1, and 6.10.3.</p>
Civil Contractor (CV Ainun) <ul style="list-style-type: none"> • Has been a contractor for BPK Estate since 2013. • Contractors are required by companies to comply with OHS and PPE procurement by contractors. • Payments to contractors are made on time in accordance with the contract. • The agreement contains articles such as payment methods, occupation, OHS aspects and employment such as the provision of PPE and registration on accident insurance of contractor workers by the contractor. • Communication between the contractor and the company is well established. • The company's relationship with the surrounding villages so far is quite good. • There are no complaints from contractors. 	<p>The company has implemented the principles & criteria of RSPO on indicator 6.10.1, and 6.10.3.</p>
FFB Transport Contractor <ul style="list-style-type: none"> • Has been a contractor for FFB transport of BPK Estate since 2017. • Contractors are required by companies to comply with OHS and PPE procurement by contractors. • Payments to contractors are made on time in accordance with the contract. 	<p>The company has implemented the principles & criteria of RSPO on indicator 6.10.1, and 6.10.3.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> The agreement contains articles such as payment methods, occupation, OHS aspects and employment such as the provision of PPE and registration on accident insurance of contractor workers by the contractor. Communication between the contractor and the company is well established. The company's relationship with the surrounding villages so far is quite good. There are no complaints from contractors. 	
Environment Agency Of Kubu Raya District – Head of section on environmental control and pollution. <ul style="list-style-type: none"> The company has made mandatory reporting; submission of reports to related agencies There is no issue of land fires and environmental pollution The first semester RKL / RPL report year 2018 has been received Environmental documents are complete and in accordance with regulations No history of forest fires in the past year Improve response if there is an information request 	<p>In accordance with criteria 2.1, 5.1, 6.5, 6.6</p> <p>All permits held are still valid (Hazardous Waste storage permit, domestic liquid waste permit and liquid waste application permit) are discussed in indicator 2.1.1</p> <p>The company already has environmental documents specified in indicator 5.1.1</p>
Manpower and Transmigration Agency Kubu Raya District – Head of section on norms and terms of employment <ul style="list-style-type: none"> The company has made mandatory reporting; submission of reports to related agencies There is no issue related to employment Company regulations have been ratified in the province The company facilitates the formation of labour union and supports the activities 	<p>In accordance with criteria 2.1, 6.5, 6.6</p>
Gender Committee of BPK Estate and Mill <ul style="list-style-type: none"> Company provides reproductive rights for woman worker such as menstrual leave and maternity leave. Worker can take menstrual leave for 2 days after examined by doctor or midwife. Maternity leave is about 1,5 month before and after giving birth. Gender committee is active in giving socialization to worker about complaint mechanism and reproductive rights. There is no complaint or issue about sexual harassment. 	<p>The company has implemented the principles & criteria of RSPO on indicator criteria 6.9 about reproductive rights for woman worker.</p>
Worker union of BPK Mill <ul style="list-style-type: none"> All worker is permanent worker. Basic wage is in accordance with minimum wage of Kubu Raya Regency period of 2019. Overtime payment is paid according to applicable regulation. 	<p>The company has implemented the principles & criteria of RSPO about worker welfare and industrial</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> • Company provides PPE and registered all worker to social and health insurance. • There is no issue related to worker welfare such as discrimination or child worker. • Company provides housing, education facility, clinic, employee cooperative for worker. • Worker recruitment for processing worker is diutamakan from surrounding village. 	relationship on indicator 4.7.3, 6.5.1, 6.5.2, 6.6.1, 6.7.1, 6.8.1, 6.9.1.
<p>Surrounding communities and previous land owner of Mega Timur and Sungai Melaya Village</p> <ul style="list-style-type: none"> • Communication between PT Bumi Pratama Khatulistiwa and representative of villages went well. There is no complaint about company's operational activity. However, village communities feels that company's assist in CSR aspect is less. • There is no land conflict with PT Bumi Pratama Khatulistiwa. • There is no land fire in previous year. • Company helps increase economy level of communities by agreement with local contractor. Also some of villagers work in PT Bumi Pratama Khatulistiwa. 	Auditor has verified the compliance with social and worker welfare aspect in criterion 6.8 and 6.11. As for assistance for village, company has CSR program and has implemented it. It has explained in indicator 6.11.1.

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY
4.1	<p>Formal Sign-off of Assessment Findings</p> <p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;"> <p>PT Bumi Pratama Khatulistiwa Unit Head</p>  <p><u>Abdullah Dalimunthe</u> Monday, 26 August 2019</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><u>Leonada</u> Monday, 26 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	Response	
						Yes	No
1	Plantation Agency of Kubu Raya Regency	Kubu Raya Regency	-	Interview	25 June 2019	-	✓
2	Land National Agency of Kubu Raya Agency	Kubu Raya Regency	-	Interview	25 June 2019	-	✓
3	Manpower Agency of Kubu Raya Agency	Kubu Raya Regency	-	Interview	25 June 2019	✓	-
4	Environmental Agency of Kubu Raya Agency	Kubu Raya Regency	-	Interview	25 June 2019	✓	-
5	Sungai Enau Village	Sungai Enau Village	-	Interview	26 June 2019	✓	-
6	Mega Timur Village	Mega Timur Village	-	Interview	26 June 2019	✓	-
7	Previous Land Owner of Mega Timur and Sungai Enau Village (5 sampel from 25 persons according to compensation documents) <i>*all sample can't be met, because have passed away.</i>	Sungai Enau and Mega Timur Village	-	-	26 June 2019	✓	-
8	Tuah Jubata Cooperative	Sungai Enau and Mega Timur Village	-	Interview	25 June 2019	✓	-
9	Local contractor of CV Ainun and FFB Transporter	Kubu Raya Regency	-	Interview	25 June 2019	✓	-
10	Worker union of PT BPK	PT Bumi Pratama Khatulistiwa	-	Interview	25 June 2019	✓	-
11	Gender Committee of PT BPK	PT Bumi Pratama Khatulistiwa	-	Interview	25 June 2019	✓	-
12	BPK Mill : Loading ramp – 4 worker Boiler – 3 worker Engine Room – 1 worker Kernel station – 1 worker Sterilizer station – 1 worker Press station – 1 worker WTP – 1 operator WWTP – 1 operator Hazardous waste storage – 1 worker Workshop – 2 mechanic Chemical storage – 1 worker	PT Bumi Pratama Khatulistiwa	-	Interview	25 June 2019	✓	-
13	BPK Estate : Harvester – 16 worker Pesticide applicator – 8 worker Fertilizer applicator – 7 worker Daycare – 1 worker Clean water -1 worker Fertilizer Storage – 1 worker	PT Bumi Pratama Khatulistiwa	-	Interview	26 June 2019	✓	-

	Clinic – 1 doctor						
14	Sawit watch	Bogor, Indonesia	info@sawitwatch.or.id	Email	18 June 2019	-	√
15	WWF	Jakarta, Indonesia	wwf-indonesia@wwf.or.id	Email	18 June 2019	-	√
16	WALHI	Jakarta, Indonesia	informasi@walhi.or.id	Email	18 June 2019	-	√
17	AMAN	Jakarta, Indonesia	rumahaman@cbn.net.id	Email	18 June 2019	-	√

Appendix 2. Assessment Program

DATE	24 - 28 June 2019	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 24 June 2019		
08.25 – 10.05	Jakarta → Pontianak	All Auditor
10.05 – 12.00	Pontianak → Site (PT. BPK)	
12.00 – 14.00	Break	
14.00 – 15.00	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)	
15.00 – 17.00	Documents Review <ul style="list-style-type: none">Review of previous assessment findingsVerification of Basic Information Mill and EstateConfirmation of Time Bound PlanReview of Partial CertificationVerification of P n C documents	
Tuesday, 25 June 2019		
08.00 – 12.00	Stakeholders consultation to related agencies Interview with Gender Committee, Worker's Union, , Worker's Cooperative (if any), Local Contractor (for Mill and Estate), Smallholders, Third Party Supplier (if any), local NGO (if any) Field Observation to Bumi Pratama Khatulistiwa Estate Implementation of Legal Aspect (Land Ownership, Legal Boundaries), HCV area	BYG AAS/HSS
12.00 – 14.00	Break	LEO
14.00 – 17.00	Field observation to Bumi Pratama Khatulistiwa Mill : <ul style="list-style-type: none">Supply Chain verification (FFB Receiving, Weighbridge),Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect, security post, FFB Sorting, Processing Activity, Despatch CPO)Implementation of Environmental aspect, Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, POME Pond & land application	LEO HSS/AAS BYG
Wednesday, 26 June 2019		

DATE	24 - 28 June 2019	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
08.00 – 12.00	Field Observation to Bumi Pratama Khatulistiwa Estate Aspect to be verified : - Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect - Implementation of Environmental, and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management), Observation of Workers Facilities (Housing, School, Worship Place). Stakeholder consultation to affected communities surrounding the plantations, indigenous peoples, local communities and previous land owners. Legal documents verifcaion	HSS/LEO BYG AAS LEO All Auditor
12.00 – 14.00	Break	
14.00 – 17.00	<ul style="list-style-type: none"> Continue Field Observation and field observation clarification Verification of documents and completing checklist 	
Thursday, 27 June 2019		
08.00 – 12.00	<ul style="list-style-type: none"> Continue Field Observation and field observation clarification Verification of documents and completing checklist 	All Auditor
12.00 – 14.00	Break	
14.00 – 17.00	<ul style="list-style-type: none"> Continue Field Observation and field observation clarification Verification of documents and completing checklist 	
Interim Meeting (closing meeting preparation)		
Friday, 28 June 2019		
08.00 – 10.00	Closing Meeting	All Auditor
10.0 – 12.00	Site PT. BPK → Pontianak	
15.15 – 16.45	Pontianak → Jakarta	