

## **Roundtable on Sustainable Palm Oil Certification R S P O**

### **[✓] Surveillance**

Name of Management : Brahma Binabakti Palm Oil Mill – PT Brahma Binabakti, subsidiary of Triputra Organisation  
 Organisation : Agro Persada  
 Plantation Name : PT Brahma Binabakti; Brahma Binabakti Estate  
 Location : Village of Suko Awinjaya, Sub District of Sekernan, District of Muaro Jambi, Province of Jambi, Indonesia  
 Certificate Code : **MUTU-RSPO/114**  
 Date of Certificate Issue : 26 May 2015      Date of License Issue : 10 July 2019  
 Date of Certificate Expiry : 25 May 2020      Date of License Expiry : 25 May 2020

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-4	18 to 21 March 2019	Leonada (Lead Auditor), Asystasya Aishah Silalahi, Hasiholan Sihombing, Bayu Yogatama	Ardiansyah	Octo H. P. N. Nainggolan

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-4	05 July 2019

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Figure 1. Location Map of PT Brahma Binabakti, Jambi Province

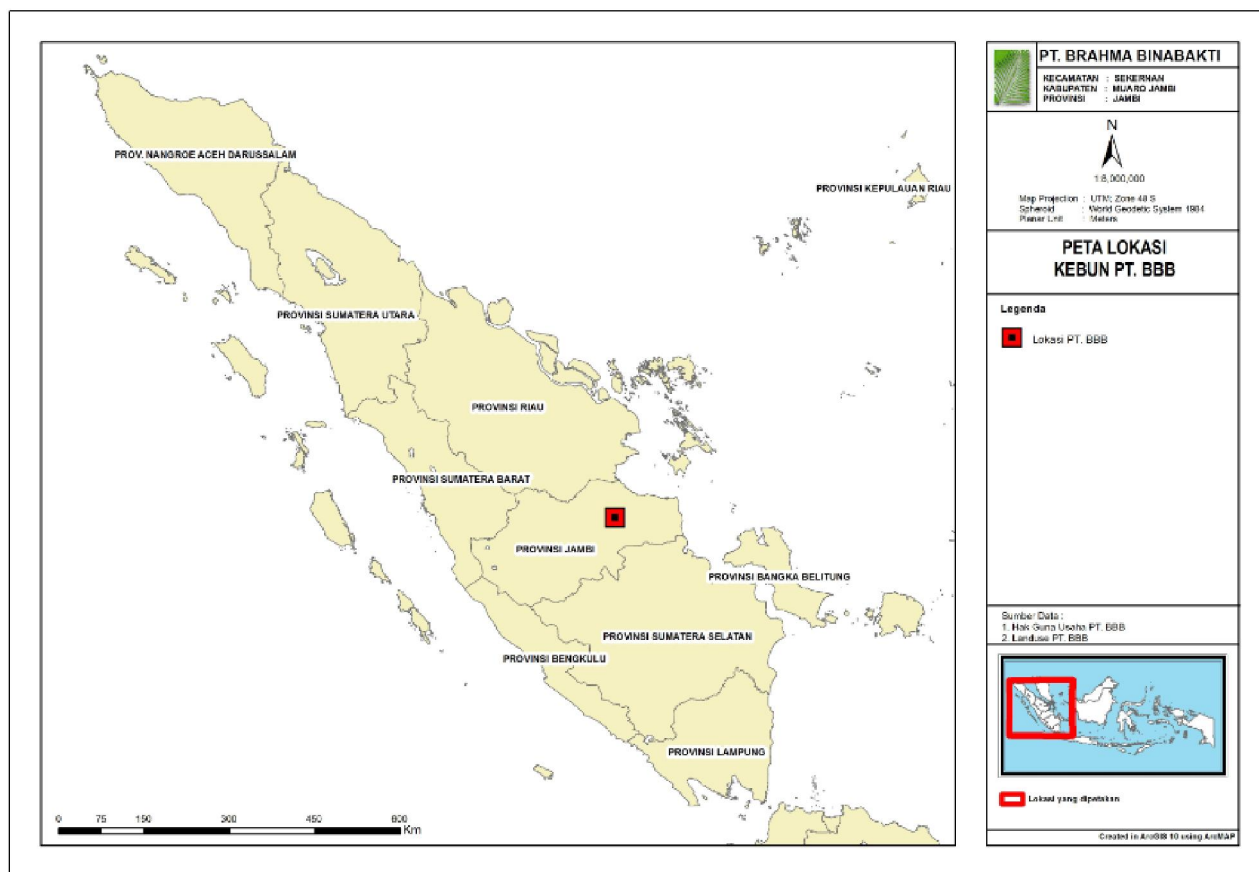
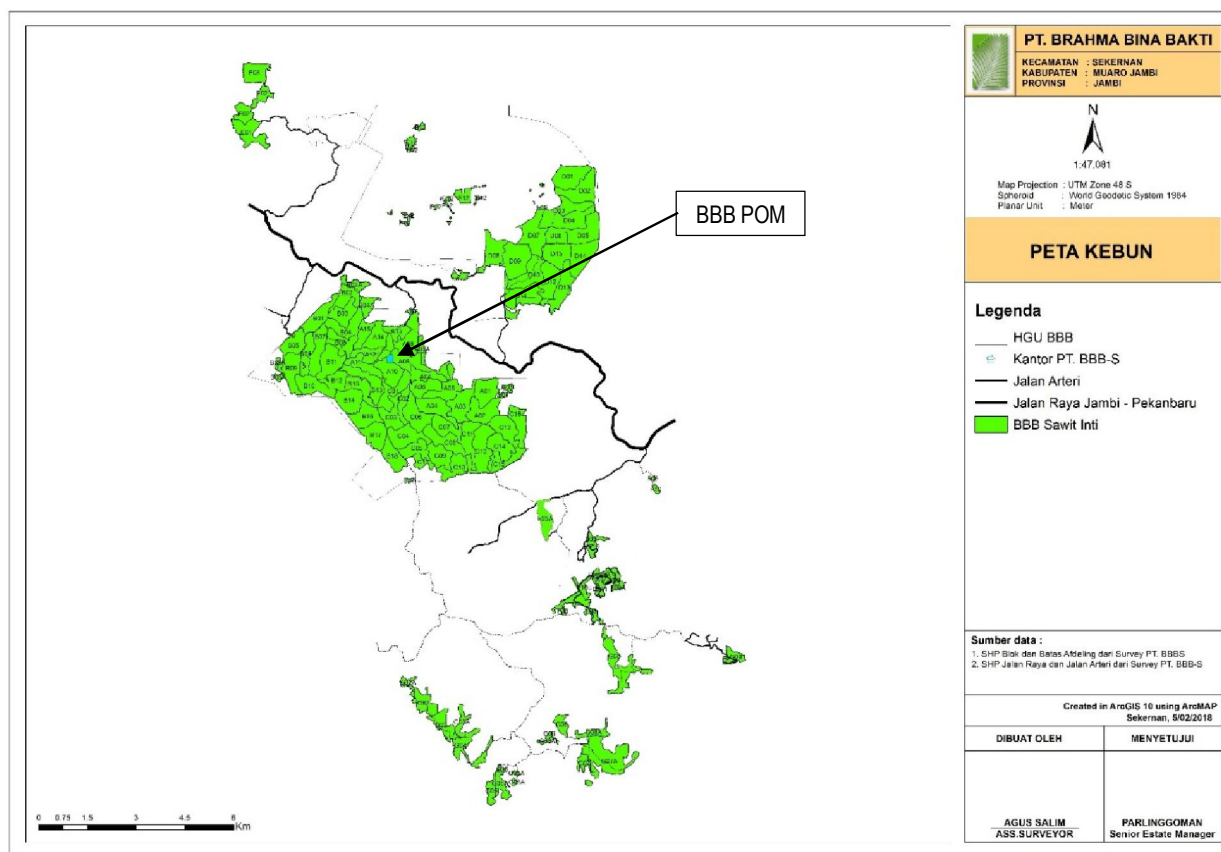


Figure 2. Operational Map of PT Brahma Binabakti.



**Abbreviations Used**

ALS	: Assessor Licensing Scheme
ASA	: Annual Surveillance Assessment
APAR	: <i>Alat pemadam api ringan</i> (Fire Distinguisher)
BBB	: Brahma Binabakti
BPJS	: <i>Badan Penyelenggara Jaminan Sosial</i> (Worker and Health Insurance)
CB	: Certification Body
CEO	: Chief Executive Officer
CH	: Certificate holder
CITES	: Convention on International Trade in Endangered Species of Wild Fauna and Flora
CPO	: Crude Palm Oil
CSPK	: Certified Sustainable Palm Kernel
CSPO	: Certified Sustainable Palm Oil
CSR	: Corporate Social Responsibility
CV	: Curriculum Vitae
DELH	: <i>Dokumen Evaluasi Lingkungan Hidup</i>
EFB	: Empty Fruit Bunch
EIA	: Environmental Impact Assessment
EM	: Estate Manager
FFB	: Fresh Fruit Bunch
FPIC	: Free, Prior, Informed, Consent
FR	: Frequency Rate
GHG	: Greenhouse Gases
GM	: General Manager
HCV	: High Conservation Value
HCVRN	: High Conservation Value Resource Network
HGB	: Building Use Title
HGU	: <i>Hak Guna Usaha</i> (Land use title)
HIRAC	: Hazard Identification, Risk Assessment, and Control
IPB3	: <i>Ikatan Pekerja Brahma Binabakti</i>
IPM	: Integrated Pest Management
KER	: Kernel Extraction Rate
KUD	: Smallholders Cooperative
LSU	: Leaf Sampling Unit
MCU	: Medical Check Up
MSDS	: Material Safety Data Sheet
OER	: Oil Extraction Rate
OFI	: Opportunity For Improvement
OHS	: Occupational Health and Safety
P2K3	: <i>Panitia Pembina Keselamatan dan Kesehatan Kerja</i> /OHS Committee
PIC	: Person In Charge
PK	: Palm Kernel
PKB	: <i>Perjanjian Kerja Bersama</i> (Collective Labour Bargaining)
POM	: Palm Oil Mil
POME	: Palm Oil Mil Effluent
PPE	: Personal Protective Equipment
RKL	: <i>Rencana Kelola Lingkungan</i>
RPL	: <i>Rencana Pemantauan Lingkungan</i>
RSPO	: Roundtable on Sustainable Palm Oil
RTE	: Rare, Threatened, and Endangered

SCCS	:	Supply Chain Certification Standard
SEM	:	Senior Estate Manager
SMK3	:	<i>Sistem manajemen keselamatan dan kesehatan kerja</i> (Occupational Safety and health system management)
SOP	:	Standard Operating Procedure
SPSI	:	<i>Serikat Pekerja Seluruh Indonesia</i> (Worker Union)
SR	:	Severity Rate
SSU	:	Soil Sampling Unit
WTP	:	Water Treatment Plant
WWTP	:	Wastewater Treatment Plant

<b>1.0</b>	<b>SCOPE of the CERTIFICATION ASSESSMENT</b>		
<b>1.1</b>	<b>Assessment Standard Used</b>	<ul style="list-style-type: none"> <li>Indonesian National Interpretation of RSPO Principles and Criteria 2013 by INA-NITF, July 2016 (Endorsed by the RSPO Board of Governors meeting on 30<sup>th</sup> September 2016)</li> <li>RSPO Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014 revised on 14 June 2017 (Module E for CPO Mill)</li> <li>RSPO Certification System for Principles and Criteria, June 2017 (Endorsed by the RSPO Board of Governors on 14th of June 2017)</li> </ul>	
<b>1.2</b>	<b>Organisation Information</b>		
1.2.1	Organisation name listed in the certificate	PT Brahma Binabakti	
1.2.2	Contact person	Dian Novita Putri	
1.2.3	Organisation address and site address	<b>Head Office:</b> The East Building, 23 <sup>rd</sup> floor, Dr. Ide Anak Agung Gede Agung Street, Kav E.3.2 No. 1, Jakarta Selatan, Indonesia  <b>Liaison Office:</b> Jalan Sultan Thaha No.4 Pasar Jambi – Pasar Jambi Kota Jambi – 36113, Indonesia.	
1.2.4	Telephone	021 – 5794 4737	
1.2.5	Fax	021 – 5794 4745	
1.2.6	E-mail	<a href="mailto:George.oetomo@tap-agri.com">George.oetomo@tap-agri.com</a>	
1.2.7	Web page address	<a href="http://www.tap-agri.com">http://www.tap-agri.com</a>	
1.2.8	Management Representative who completed the application for certification	George Oetomo	
1.2.9	Registered as RSPO member	1-0038-07-000-00 since 27 June 2007	
<b>1.3</b>	<b>Type of Assessment</b>		
1.3.1	Scope of Assessment and Number of Management Unit	Palm Oil Mill and supply base: Brahma Binabakti Mill and Brahma Binabakti Estate	
1.3.2	Type of certificate	Single	
<b>1.4</b>	<b>Locations of Mill and Plantation</b>		
1.4.1	Location of Mill		
	<b>Name of Mill</b>	<b>Location</b>	<b>Coordinate</b>
			<b>Latitude</b> <b>Longitude</b>
	Brahma Binabakti	Village of Suko Awinjaya, Sub District of Sekernan, District of Muaro Jambi, Province of Jambi, Indonesia.	S 01° 20' 50"      E 103°19'34"
1.4.2	Location of Certification Scope of Supply Base		
	<b>Name of Supply Base</b>	<b>Location</b>	<b>Coordinate</b>
			<b>Latitude</b> <b>Longitude</b>
	Brahma Binabakti	Village of Suko Awinjaya, Sub District of	S 01° 21' 38"      E 103° 21' 38"



Estate		Sekernan, District of Muaro Jambi, Province of Jambi, Indonesia			
1.5	Description of Area Statement				
1.5.1	Tenure				
	• State		Land Rights Title (HGU) = 7,227.31 Ha Building Rights Title (HGB) = 49.22 Ha Total = 7,276.53 Ha		
	• Community		- Ha		
1.5.2	Area Statement				
	• Total area		7,087.53	Ha	
	• Mature area		4,352.09	Ha	
	• Immature area		-	Ha	
	• Emplacement and Office		18.67	Ha	
	• Nursery		17.06	Ha	
	• Road and Drain		248.92	Ha	
	• River		1.26	Ha	
	• Enclave		244.40	Ha	
	• Rubber Plantation		2,155.91	Ha	
	• Mill		49.22	Ha	
	<i>Source: hectar statement data per March 2019.</i>				
<i>- HCV covering an area of 70.05 Ha is included in the planted area (rubber plantation, river, palm oil plantation)</i>					
<i>- The area of HGU in previous assessment (ASA-3) certificate is 7,227.09 Ha, but based on recalculation on ASA-4, it is known that the PT BBB HGU area is 7,227.31 Ha.</i>					
<i>- Certified area in this ASA 4 is added 49.22 Ha (HGB) which has include as scope certification since 2015.</i>					
<i>- 189 Ha is exclude from previous scope certification (smallholder area of Akso Dano Cooperative)</i>					
<i>- <b>Scope certification area is 7,087.53 Ha</b></i>					
1.6	Planting Year and Cycles				
1.6.1	Age profile of planting year				
	Planting Year	Hectarage (Ha)			
		Brahma Binabakti Estate		Total	
	1994	1,006.45		1,006.45	
	1995	1,161.10		1,161.10	
	1996	848.07		848.07	
	1997	185.11		185.11	
	1998	397.14		397.14	
	2005	28.08		28.08	
	2006	279.21		279.21	
	2007	446.93		446.93	
	TOTAL	4,352.09		4,352.09	
<i>Source: hectar statement data per March 2019</i>					
1.6.2	New Planting area after January 2010		- Ha		

1.6.3	Planting Cycle			1 <sup>st</sup> Cycle			
1.7	Description of Mill and Supply Base						
1.7.1	Description of Mill						
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel	
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)
	Brahma Binabakti	60	352,450.88	71,102.16	20.17	18,466.28	5.24
<i>*Production data source from March 2018 – February 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)	%
	Brahma Binabakti	7,087.53	4,352.09	87,555.92	20.12	87,555.92	100
	TOTAL	7,087.53	4,352.09	87,555.92	20.12	87,555.92	100
<i>*Production data source from March 2018 – February 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)	
	Brahma Binabakti Estate (Non HGU) (RSPO Non Certified)		PT Brahma Binabakti	-	424.45	2,658.79	
	Plasma 1 (RSPO Non Certified)		KUD Akso Dano (Independent supplier)	1,505	4,278	88,464.51	
	Plasma 2 (RSPO Non Certified)		KUD Akso Dano (Associated smallholder)	377	1,848	32,448.22	
	Plasma Pemayung (No RSPO Non Certified)		KUD Dano Bangko (full managed by CH)	202	414	9,686.45	
	Third Party (RSPO Non Certified)		Independent supplier	-	-	131,636.98	
	TOTAL						264,894.95
<i>*Production data source from March 2018 – February 2019</i>							
1.7.4	Product categories			FFB, CPO, PK			
1.8	Tonnage of Product						
1.8.1	Past Annual Claim Certified Product		Last Year Projected Certified Volume (MT)		Last Year Actual Certified Volume (MT)		
	• FFB Production		91,394		87,555		
	• CPO Production		19,193		17,880		
	• Palm Kernel (PK) Production		4,762		4,607		
1.8.2	Product selling						
	Tonnage of selling product		Actual selling product for last year (MT)				
	• CSPO sold as RSPO certified product		6,934				
	• CSPK sold as RSPO certified product		588				
	• CSPO sold under other scheme		-				
	• CSPK sold under other scheme		-				
	• CSPO sold as conventional		10,455				

	• CSPK sold as conventional				3,340			
1.8.3	Estimate of Certified FFB Claim							
	Name of Estates		Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)		
	Brahma Binabakti Estate		7,087.53	4,352.09	90,000	20.68		
	TOTAL		7,087.53	4,352.09	90,000	20.68		
*Projected FFB production for 26 May 2019 – 25 May 2020								
1.8.4	Estimate of Certified Palm Product Claim							
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel	Supply Chain Module	
				Out put (tonnes)	Extraction (%)	Out put (tonnes)		Extraction (%)
	Brahma Binabakti Mill	60	90,000	18,700	20.78	4,800	5.33	MB
*Projected CSPO and CSPK production for 26 May 2019 – 25 May 2020								
1.9	Other Certifications							
	ISO 9001:2008			-				
	ISO 14001: 2004			-				
	OHSAS 18001:2007			-				
	ISCC			-				
	ISPO			PT Brahma Binabakti has achieved ISPO certificated since 26 Mei 2015 (Certificate Number ISPO 00007).				
	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						
	Brahma Binabakti	2015	Brahma Binabakti Estate	2015	District of Muaro Jambi, Province of Jambi, Indonesia	Certified		
			Brahma Binabakti Estate (Non HGU)	2022	District of Muaro Jambi, Province of Jambi, Indonesia	-		
			Plasma Pemayung (full managed scheme smallholder)	2019	District of Batang Hari, Province of Jambi, Indonesia	-		
	Gawi Bahandep Sawit Mekar	2014	Gawi Bahandep Sawit Mekar	2014	District of Seruyan, Province of Central Kalimantan, Indonesia	Certified		
			Koperasi Usaha Mandiri	2022	District of Seruyan, Province of Central Kalimantan, Indonesia	-		
	First Lamanda u Timber	2019	First Lamandau Timber International	2019	District of Lamandau, Province of Central Kalimantan, Indonesia	-		

Internatio nal	Koperasi Natai Pelingkau – Tangga Batu	2022	District of Lamandau, Province of Central Kalimantan, Indonesia	-
	Koperasi Guna Wahana Sejahtera – Belibi	2022	District of Lamandau, Province of Central Kalimantan, Indonesia	-
	Koperasi Sepakat Di'l – Sungai Buluh	2022	District of Lamandau, Province of Central Kalimantan, Indonesia	-
	Koperasi Karya Sehati – Buluh	2022	District of Lamandau, Province of Central Kalimantan, Indonesia	-
<p>PT. Triputra Agro Persada is also a holding company and has management control over the following companies:</p> <ul style="list-style-type: none"><li>- PT. Muaratoyu Subur Lestari</li><li>- PT. Etam Bersama Lestari</li><li>- PT. Hamparan Perkasa Mandiri</li></ul> <p>In this case, the company has not been able to show a timebound plan for all management units of PT. Triputra Agro Persada along with the results of a partial audit for the those units. This matter has raised into Major Non conformity (NC 2019.04)</p>				
1.10.2	<b>Progress of Associated Smallholders and Outgrowers for Certifiable Standard</b>			
	<p><b>Verification on ASA-3</b></p> <p>Based on document verification and interview with related stakeholder, obtained information that the company has had a partnership contract with KUD Akso Dano (Plasma 1 &amp; 2) and KUD Dano Bangko (Plasma Pelayung) which is categorized as associated smallholder. Through the public consultation with board of smallholder (KUD) and FFB received data in mill obtained information that those associated smallholder supplied FFB to the mill consistenly. However, until the ASA-3 assessment, CH can not show that those associated smallholder has been implemented RSPO standard so it raised as Non-conformity <b>NC 2018.6 RSPO Certification System Clause 4.2.3</b>.</p> <p><b>Verification on ASA-4</b></p> <p>Based on the results of the documents verification, interview with smallholders cooperative are known as follows:</p> <p><b>KUD Akso Dano (Plasma 1)</b></p> <p>The partnership was based on the agreement dated 6 February 1995. Based on the agreement, it was known that the agreement was started from the construction of the plantation by the company and was managed by the company until The farmers settled the credit. Article 15 also states that the agreement applies only until the farmers settled the credit. Currently plasma 1 farmers have completed credit and managed plasma land by each farmer, while FFB can be sent to Brahma Binabakti Mill based on the sale and purchase agreement No. TBS.123456/BBB/PER-CSR-SK/V/16 dated 18 May 2016.</p> <p>But the FFB sale and purchase agreement is not binding on the farmer to always send FFB to the company, the farmers have the freedom not to sell their FFB to the company. This FFB sale and purchase agreement is only as a basis if the farmer sends FFB to the company, arranges price, payment, quality requirements etc. This was also confirmed by the cooperative management, during an interview.</p> <p><b>KUD Akso Dano (Plasma 2).</b></p> <p>The partnership was based on the agreement dated 3 September 2004. According to the agreement, it was known that the agreement was started from the construction of the plantation by the company, while the subsequent plantation management was carried out by each farmer. For FFB, it is required to be sent to the company's mill for one cycle of</p>			

oil palm plants ( $\pm$  20 years), as stated in article 5 paragraph 2. So that the current FFB is still exclusively sent to the company's mill.

#### KUD Dano Bangko

The Partnership is based on agreement No. 001/SPK/DB-BBB/I/2012 dated 30 January 2012. According to the agreement, it is known that cooperation is bound to one cycle of oil palm plants (25-35 years). For management carried out by the company (full managed) as stated in article 8 paragraph 1.e and article 9 paragraph 1.c. So in this case, the area of the farmer is directly managed land by the company and becomes part of the management unit of PT. Brahma Binabakti that must be carried out by RSPO certification, with reference to the timeboundplan prepared by the company.

Based on the description above it can be concluded that:

1. KUD Akso Dano (Plasma 1) is not required to apply the RSPO standard because the existing agreement is only temporary sale of FFB and is an independent supplier.
2. KUD Akso Dano (Plasma 2) is required to implement the RSPO standard because it is associated smallholders with the agreement to develop plasma plantations and sending FFB to companies exclusively.
3. KUD Dano Bangko is required to follow RSPO certification because the management is carried out directly by the company and is part of the management unit of PT. Brahma Binabakti. For the timing of the certification implementation, it can follow the timeboundplan.

From the above conclusions, Minor non-conformity in ASA-3 cannot be closed and **increases to Major non-conformity in ASA-4. Particularly related to the application of the RSPO standard for KUD Akso Dano (Plasma 2).**

<b>2.0</b>	<b>ASSESSMENT PROCESS</b>
<b>2.1</b>	<b>Assessment Team</b>
<b>ASA-4</b>	<p><b>1. Leonada (Lead Auditor).</b> 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><b>2. Hasiholan Sihombing (Auditor).</b> 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&amp;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, OHS aspects.</p> <p><b>3. Asystasya Aishah Silalahi (Auditor).</b> 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><b>4. Bayu Yogatama (Auditor).</b> Bachelor of Forestry, Department of Forest Resources Conservation and Ecotourism, Bogor Agricultural University. Has attended the ISO 9001: 2015 Quality Auditor / Lead Auditor Course Quality Management System (QMS) course and ISO 19011: 2011 Guidelines for Auditing Management System, ISPO Lead Training, SA 8000, RSPO Lead Training, IHT RSPO NPP, IHT RSPO RaCP, IHT ISO 17021, and IHT ISO 17065. Having experience working in plywood field as Inspector in foreign private company. Currently working for an independent certification body. During this audit, he verify Environmental Aspect, HCV, and Green House Gases.</p>
<b>2.2</b>	<b>Assessment Methodology, Assessment Process and Locations of Assessment</b>
<b>2.2.1</b>	<b>Figure of person days to implement assessment</b>
<b>ASA-4</b>	<p>Number of auditors : 4 auditor</p> <p>Number of days for <b>ASA-4</b> at site : 4 days</p> <p>Number of working days for <b>ASA-4</b> at site : 16 Working days</p>
<b>2.2.2</b>	<b>Assessment Process</b>
<b>ASA-4</b>	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Brahma Binabakti 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 Jambi by plane and travel to site by car, then continued with the opening meeting. The opening and closing meeting was held in the Meeting Room attended by the Estate Manager, Mill Manager, Assistants, and other related personnel's. During audit activity, auditors always accompanied</p>



by client and the documents are presented well.

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-4** delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase (**RC**). Improvement of findings from previous assesment findings were observed by auditors at this **ASA-4** assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of **ASA-4**.

The assessment program please find Appendix 2

### 2.2.3 Locations of Assessment

<b>ASA-4</b>	<b>BBB Mill:</b> <ul style="list-style-type: none"> <li>• <b>Security Post (2 security).</b> Observation and interview with security related personnel understanding over the applicable SOP, the implementation of occupational health and safety, medical examination, trainings from company and worker welfare.</li> <li>• <b>Loading Ramp (2 workers).</b> Observation and interview with sortation personnel related to understanding over sortation procedure, the implementation of sortation, fruit criteria, fruit separation with ripeness and rawness criteria.</li> <li>• <b>Sterilizer Station (1 worker).</b> 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.</li> <li>• <b>Press Station (1 worker).</b> 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.</li> <li>• <b>Boiler Station (1 workers).</b> 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.</li> <li>• <b>Engine Room Station (1 worker).</b> 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.</li> <li>• <b>Kernel Station (1 worker).</b> 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.</li> <li>• <b>EBA.</b> Observation of waste management.</li> <li>• <b>Hydrant No 4.</b> Observe of preparedness and emergency response simulation</li> <li>• <b>WTP (1 operator)</b> Field observations and staff interviews related to working hours, occupational safety and health (PPE), water sources, water treatment, chemicals used, MSDS, occupational accidents, first aid boxes, health checks, Fire Distinguiher (APAR). and workplace conditions.</li> <li>• <b>Hazardous waste storage (1 operator).</b> Field observations related to the management of hazardous and toxic materials.</li> <li>• <b>Workshop (2 operator).</b> Observation and interviews with employees related to management of hazardous waste and hazardous material, training, provision of PPE, training, emergency response facilities</li> <li>• <b>Chemical storage (1 operator).</b> Field observations related to condition in the chemical warehouse and management of hazardous and toxic materials</li> <li>• <b>Material storage (1 operator).</b> field observation and interview with employee related management of hazardous waste and hazardous material. Provision of PPE, training, and emergency response facilities.</li> <li>• <b>Oil Storage.</b> Field observations related to condition in the oil warehouse and management of hazardous and toxic materials</li> <li>• <b>Weight bridge.</b> Observation and interview with weight bridges operator regarding to supply chain procedure, FFB supplier code, separation of certified and noncertified product, including it calculation</li> </ul>
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**BBB Estate:**

- **Block C12 Division C (5 Pesticide Applicator).** 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 A13 Division A (4 harvester).** Observation and interview with harvester related fruit ripeness, safe working practices and also worker welfare.
- **Block C11 Division C (Manual Weeding – 2 worker).** Field observations on manual weeding and interview with the worker related to the procedure, safety and health and also worker welfare.
- **Block A12 Division D (10 Fertilizer Loader).** Interview with the fertilizer loader related type of fertilizer use according to the procedure and also worker welfare.
- **Block A26 Division A (Barn Owl Nest Observation).** To check nest condition.
- **Block C14 Division C (EFB Application – 4 worker).** Field observations on application of empty fruit bunch and interview with the worker related to the procedure, safety and health and also worker welfare.
- **Land Application Mawar 3.** Field observations and staff interviews related to application areas, number of beds, rotation of application land, bed capacity, working hours, work of helper, wastewater streaming techniques, bed wash, work equipment, wall bed improvement, occupational safety and health (PPE), recording of work, medical examination, BPJS membership, SPSI membership, housing, and first aid kit.
- **Housing Afdeling D.** Observation and interview regarding to feasibility of facilities, complain mechanism, waste management, clean water and access to basic needs.
- **Day Care Afdeling D (2 workers)** Interview related to worker welfare, complain mechanism, and feasibility of facilities
- **Pesticide Warehouse (1 worker)** Field observations related to condition of the storage, symbols, MSDS, channels and pesticide spill containers, and pesticide stock, and management of hazardous and toxic materials.
- **Fertilizer Warehouse (1 Worker)** Field observations related to condition of the storage, symbols, MSDS, channels and pesticide spill containers, and pesticide stock, and management of hazardous and toxic materials.
- **Block D/E 40 Aik Mudur bufferzone river** Observation HCV area. the condition of the HCV area is well
- **Material Warehouse** Field observations related to condition of the storage, symbols, MSDS, channels and pesticide spill containers, and pesticide stock, and management of hazardous and toxic materials.
- **Clinic (1 Doctor).** Observation and interview regarding to health service and facility and infectious waste management.
- **PPE and Washing House.** Field observations and staff interviews related to the condition and facilities of PPE and washing houses.
- **Landfill area Block A 10** Observation and interview to supervisor anorganic and organic management, and OHS aspect.
- **Workshop** Observation and interviews with employees related to management of hazardous waste and hazardous material, training, provision of PPE, training, emergency response facilities
- **Generator House Afdeling D** Observation about hazardous maintenance and emergency facilities.
- **HCV Block C 11 Afdeling C.** Observation HCV area. the condition of the HCV area is well maintained, good delineated and signed clearly. It is also accessible.
- **Solar tank** Observation Hazardouse waste management, MSDS, Symbols and the others.
- **Interviews and Simulations with Emergency Response Groups** Observations related to the preparedness of the emergency response team, the ability and understanding of members, the completeness of the fire prevention equipment.
- **Boundary Poles No. KP51 block B2A, No. KP53 block B2A, No. KP54 block B4.** Observation on boundaries poles, coordinates, maintenance, and demarcation.
- **Rubber area block D08.** Observation area of rubber area and the border with palm oil.
- **Enclave Area block B18.** Observation of condition and boundaries of reserve areas (enclave).
- **Area of HGU on process block C10.** Observation of condition and boundaries of HGU on process, FFB separation mechanism etc.

**Surrounding Communities**

1. **Tanjung Lanjut Village.** Interview land issues, environment, social etc.



	2. <b>Bukit Baling Village.</b> Interview with previous land owner, land issues, environment, social etc.
<b>2.3</b>	<b>Stakeholder Consultation and Stakeholders Contacted</b>
<b>2.3.1</b>	<b>Summary of stakeholder consultation process.</b>
<b>ASA-4</b>	<p>Consultation of stakeholders for PT Brahma Binabakti held by:</p> <ol style="list-style-type: none"> <li>1. Public announcement at web <a href="http://www.rspo.org">www.rspo.org</a> on 1 March 2019 (<a href="http://mutucertification.com/wp-content/uploads/2019/03/Notification-of-RSPO-Initial-Assessment-PT-Brahma-BinaBakti-ASA-4-English.pdf">http://mutucertification.com/wp-content/uploads/2019/03/Notification-of-RSPO-Initial-Assessment-PT-Brahma-BinaBakti-ASA-4-English.pdf</a>)</li> <li>2. Public consultation with government agencies of Muaro Jambi Regency conducted by visit and interview on 19 March 2019.</li> <li>3. Public consultation by interview with locals of the nearby village (Tanjung Lanjut and Bukit Baling Village) on 19 March 2019.</li> <li>4. Consultation meeting and interview with Internal Stakeholder (labour union, worker cooperative, gender committee and local contractor) on 19 March 2019.</li> <li>5. Consultation with NGO (Sawit Watch, WWF, Walhi and AMAN) via email on 29 January 2019.</li> </ol> <p>Numbers of input from stakeholders were clarified by PT Brahma Binabakti.</p>
<b>2.3.2</b>	<b>Stakeholder contacted</b>
	<b><i>Please find appendix 1</i></b>
<b>2.4</b>	<b>Determining Next Assessment</b>
	The next visit ( <b>RC</b> ) will be determined 8 - 12 months after date of certificate this <b>ASA-4</b> (May – 2020).

### 3.0 ASSESSMENT FINDINGS

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

MUTUAGUNG LESTARI has conducted an assessment of Brahma Binabakti POM – Brahma Binabakti, subsidiary of Triputra Agro Persada operation consisting of one (1) mill and one (1) oil palm estates.

During the assessment, there were one (1) Nonconformities were assigned against Major Compliance Indicators; one (1) major nonconformity against supply chain requirement for CPO mill; one (1) major nonconformity against certification system; one (1) Nonconformity of minor at ASA-3 that raised to major at ASA-4 and five (5) opportunities for improvement were identified.

Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5. The company has already prepared and implemented the corrective actions that had been reviewed and accepted by Auditors in form of documentation evidence(s) e.g. (*document record/photographic/etc...*). Those corrective actions taken that consist of *four (4)* Major non-conformities had been closed out shall be verified during next assessment.

MUTUAGUNG LESTARI found that Brahma Binabakti POM – Brahma Binabakti, subsidiary of Triputra Agro Persada complied with the requirements of Indonesian National Interpretation of RSPO Principles and Criteria 2013 by INA-NITF, July 2016 (Endorsed by the RSPO Board of Governors meeting on 30<sup>th</sup> September 2016); RSPO Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014 revised on 14 June 2017 (Module E for CPO Mill); and RSPO Certification System for Principles and Criteria, June 2017 (Endorsed by the RSPO Board of Governors on 14<sup>th</sup> of June 2017).

Therefore MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is continued.

Ref Std.	VERIFICATION RESULT of MUTU-Certification
<b>PRINCIPLE #1 COMMITMENT TO TRANSPARENCY</b>	
<b>1.1</b>	<b>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.</b>
<b>1.1.1</b>	<p>Certificate holder has the latest list of stakeholder period of 2019, consist of statutory bodies, local communities, worker organization, supplier, hospital, and insurance company. This list is updated by CSR officer and will be updated if there is a revision. Based on interview with statutory bodies in Muaro Jambi Regency, stakeholders also can access the company's documents, such as company's policies, licensing, reporting, and so on. They also know the mechanism and person in charge for communication with stakeholder.</p> <p>Company also reported mandatory report to related agencies, for example:</p> <ul style="list-style-type: none"> <li>- Land Use Report of PT BBB period of 2018 to Land National Agency of Jambi Province on March 1<sup>st</sup>, 2019</li> <li>- Employee Report period of 2018 to Manpower Agency of Muaro Jambi Regency on October 6<sup>th</sup>, 2018</li> <li>- Development Plantation Report Period of 4<sup>th</sup> quarter of 2018 to on January 22<sup>nd</sup>, 2019 to Plantation Agency of Muaro Jambi Regency.</li> </ul>
<b>1.1.2</b>	<p>Mechanism to respond information request listed in <i>SOP Penerimaan dan Penanganan Informasi</i> No SOP/SUPP/II/2017/001, 2<sup>nd</sup> Revision on February 20<sup>th</sup>, 2017. Based on procedure, time limit to respond information request from stakeholder is 4 days. Company recorded all incoming letter, its respond, and outgoing letter in List of Incoming and Outcoming Letter. For example: letter on February 2<sup>nd</sup> 2018 from Head of Suko Awini Jaya Village related to information about number of transportation for high school student</p>

and number of the student that use transportation from PT BBB. Company respond the letter on February 5<sup>th</sup>, 2018 by deliver the list of students and number of school bus.

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

Company has list of document that can be accessed publicly, such as:

- Land use rights document
- OSH committee implementation report
- Environment document (HCV and management and monitoring environment report)
- Report of SIA and its management report
- Complaint and grievance document
- Continual improvement document
- RSPO Audit Report
- Human right
- Etc.

The document also set stakeholder who can access the document. These documents are available in estate and mill office. CH 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.

	<b>Status: Comply</b>	
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**1.3**

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

**1.3.1**

Company has commitment related to integrity and ethical conduct in all operational activities listed in Standing Instruction No 004/SI-DIR/II/2013 on February 22<sup>nd</sup>, 2013 and ethical guide book. It states about fair business practices, prohibitions on corruption, bribery, fraud in the use of funds and resources, etc. Based on interview with worker in Mill, estate, and local contractor of FFB transporter, it is known that they understand about ethical conduct. This policy is available in Indonesian Language. Ethical conduct for contractor also written in work agreement.

	<b>Status: Comply</b>	
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**PRINCIPLE #2 COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS**
**2.1**

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

**2.1.1**

The 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 business permit which are covered in 3 permits:

- Plantation business permit, based on Muaro Jambi's One Stop Services Permit Head Decree dated on 2 November 2013.
- Plantation business permit, based on Muaro Jambi's District Head Decree dated on 18 June 2012
- Plantation business permit, based on Muaro Jambi's District Head Decree dated on 20 April 2012

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. 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: has plantation business permit, land use right, no workers under age of 18, land application permit, 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 internal memo document No. MI-005/MD/SUST/XII/2012, dated 11 December 2014 mentioned that sustainability division has responsibility to arranged and monitored legal related laws and/or regulation. The procedure mentioned that in order to monitor and update of laws and/or regulations, the sustainability and legal division required to actively check and make coordination with Government Agencies or Institutions. Internal audit of regulations compliance are conducted annually as example on 11 March 2019. The internal audits have shown the company's compliance of legal requirements according to the list of regulations 2019.

<b>Status: Comply</b>
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## 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 Brahma Binabakti has managed area totaling for about 7,700.98 Ha, which consist of 7,276.53 Ha under HGU/HGB and 424.45 Ha HGU-on process. However, scope of certification has stick on HGU area. The corporate area originates from forest area tha has been release by forestry ministry decree No: 125/Kpts-II/1993 dated 27 February 1993. In that area there are several community's land, which the land acquisition from community's area by providing compensation on 1995 - 2000. The company get the land use title for 7,276.53 Ha, which are:

- HGU Decree by National Land Agency No. 61/HGU/BPN/95 dated 2 October 1995 (valid for 25 years) for 6,210.22 Ha.
- HGU Decree by National Land Agency of Jambi No. 07/HGU/BPN.15/2014 dated 27 January 2014 (valid for 25 years) for 453.3 Ha.
- HGU Decree by National Land Agency of Jambi No. 08/HGU/BPN.15/2014 dated 27 January 2014 (valid for 25 years) for 563.78 Ha
- HGB Decree by National Land Agency No. 34/HGB/BPN/2000 dated 29 May 2000 (valid for 25 years) for 49.22 Ha

### 2.2.2

Procedure of legal boundary poles monitoring and maintenance is presented in document of Standing Instruction Managing Director No. 027/MI-DIR/XII/2012 dated 13 December 2012. Estate management were able to shows location of boundary poles map as well as its coordinate points, which are proved based on field observation in poles No. KP51 block B2A, No. KP53 block B2A, No. KP54 block B4. It could be concluded that estate management has monitored their boundary legal poles, clearly demarcated and visibly maintained.

At ASA-3 was found non compliance related to insufficient evidence that the company already has a convincing and well-implemented mechanism for separating certified and non-certified products. Based on verification at ASA-4, the company prepares non-certified area work instructions No. 01/BBB/III/2018 dated 22 March 2018, which has been socialized to employees on 12 April 2018. The work instructions explain the mechanism for making boundary marks for certified and non-certified areas in the form of blue paint on palm oil staples. Non-certified areas will be determined to be one harvest area and not combined with other areas. This is also proven from the results of field visits in block C10. The company has also mapped on a 1:40,000 map scale to identify non-certified areas (424.45 ha). Then the recording in the fruit transport note is given an NS code (non certificate) to differentiate FFB from non-certified areas, for example the 4 March 2019 receipt note of 184 FFB from block O46 as non certified. Based on the results of the verification, the minor non compliance at ASA-3 can be stated closed.

### 2.2.3, 2.2.4 & 2.2.5, 2.2.6

The company has a procedure of land acquisition (No: 002/TAP/PRO-CSP-HO/IV/10 dated 11 February 2013). The procedures started with planning and socialization that involving estate staff and villager representatives. Land survey and measurement of land should be involving land user in order to verify land ownership, handover estimation cost and land compensation process. Currently there is no land compensation on process, whole previous land compensation completed before 2000. Land compensations are documented and maintained in the Legal Department (site office and in Jakarta Head Office).

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. Brahma Binabakti. 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 (244.40 Ha). Until now, the company continuous to hold talks with landowners without any coercion. Based on interview with the communities and field observation are not found 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 describe in procedure of land acquisition (No: 002/TAP/PRO-CSP-HO/IV/10 dated 11 February 2013). The procedure started with planning and socialization that involving estate staff and villager representatives. Land survey and measurement of land should be involving land user in order to verify land ownership, handover estimation cost and land compensation process. The Company has no new land acquisition and the entire compensation process was completed before 2000. The results of compensation documents verification and interview with communities and previous land owners is known that there are no indigenous rights or customary rights. It also known that compensation process are done directed to the land owner and 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 (244.40 Ha), this is because the cultivators are not willing to relinquish their cultivated land. Based on the results of visits to cultivated areas such as Block B18 and from interviews with the people of the villages of Tanjung Lanjut Village and Bukit Baling Village it is known that the company did not force or seize these areas. Regarding these areas, the company is currently in progress making an agreement with the cultivating parties. The progress of making this land agreement or acquisition becomes an opportunity for improvement for the company (OFI).

**Status: Comply**

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

#### 3.1

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

##### 3.1.1

The company has documents on the long-term plan contained in the PT Brahma Binabakti Blue Print period 2019 - 2030 that explain about business plan and operational management which includes: area statement, projections for production, CPO, PK, Revenue CPO and PK, cost estates, mill costs, price of FFB, CPO price, PK price, purchase of FFB plasma, profit and loss, and net profit and loss. 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.

##### 3.1.2

PT BBB has a replanting program contained in the summary of the long-term plan of PT Brahma Binakati Blue Print for the period 2019 - 2030 which is explained in 2019 replanting activities will be carried out covering an area of 919 ha. Following is the replanting planning table that will be carried out:

Year	Ha
2019	919
2020	-
2021	-
2022	342
2023	1,187
2024	943
2025	584
2026	539
2027	19

Until the ASA-4 assessment, replanting activities have not been carried out.

Status: Comply
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**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**  
PT Brahma Binabakti has documents of SOP Agronomic Technical Guidelines starting from land clearing up to harvesting, approved by Director on 2014. The SOP documents among others about planning of new area planting, replanting plans, nurseries, land clearing, planting, replanting, pest and disease control, weed control, fertilization, maintenance of immature plant, preparation ahead of harvest, harvesting, loading and transportation of FFB. The Oil Mill has SOP Factory Technical Guidelines covering all mill operations such as FFB Grading, Sterilization Station, Press Station, Threshing Station, Oil Room, Kernel Plant, Laboratory, CPO & PK Despatch, Engine Room, Boiler Room, Electrical, Workshop as well as Raw and Boiler Water Treatment Plant. That SOP's is available on audit site (Estate and Mill office) and written in a language that is easily understandable for workers (written in Bahasa). Based on field observations in BBB Estate, there are still some of EFB piles that have not yet been applied, therefore the company still have the opportunity to improve the management of EFB in the field according to the procedures they have. **OFI**

The entire procedure both of plantation and mill has been included of safe working instruction, other than those described in the HIRAC document. Interviews were conducted to harvesters, pesticides applicators, and manuring workers in BBB Estate and also operators in BBB Mill. 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.

**4.1.2 and 4.1.3**

Ensuring consistency of procedures implementation, the suitability and effectiveness of the procedure, suitability with regulatory updates and best practices, the companies routinely conduct internal audit activities both agronomic and processing. It is held by the Department of Operational Internal Audit every semester. The records of internal audit on second semester of 2018 has been documented. Non compliance records of internal audit has been corrected and verified by management. There is no revision of SOP at the ASA-4 assessment. In each SOP, there is page of document control that record the revision if any.

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.

**Major 4.1.4.**

The company has procedure FFB Purchasing No. SOP/SUPP/I/2016 001 dated 29 January 2016. The Purchasing Assistant will register all suppliers and survey them before the agreement signed by both of parties. The agreement was informed about total area, FFB production estimation and land legality status. Based on FFB received report, its known that the mill received FFB from independents FFB suppliers, Plasma 1, Plasma 2, Plasma Pemayung and own estate.

Status: Comply
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**4.2  
Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.**

**4.2.1**  
The company has a procedure related to the management of planting fertility listed in the Agronomic Technical Guidelines on Fertilization. This procedure discusses about manual fertilizing (PT/EST/VII/2016/024), organic fertilizing with POME (026/PT/VIII/2014), fertilizing application in breeding (039/PT/XII/2014), mechanization of fertilizing (025/PT/II/2014), fertilizer sample test (PT/EST/X/2015/031), soil sampling unit (069/PT/VIII/2014), leaf sampling unit (050/PT/VIII/2014), and deficiency indication on plant (052/PT/IX/2014).



BBB Estate can show documents on the realization of anorganic fertilization and EFB applications for 2018. The auditor conducted an interview with the fertilizer workers at block C11 Division C. Workers can explain the fertilization procedure well, which is in accordance with the dosage determined based on the recommendations.

#### 4.2.2

BBB Estate shown the plan and the realization of fertilization for period January to December 2018. Based on document review and interview with the staff, the realization of fertilization in both estates reach 100% completed according to the program.

#### 4.2.3

The company has procedures for leaf analysis (050/PT/VIII/2014) and soil analysis (069/PT/VIII/2014). The company 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 Research Department and it is supported by well-trained census officer in estate. SSU is conducted every 5 year, meanwhile LSU is conducted annually. The last LSU result was issued on May, July and September 2018 and the last SSU result was issued on August and September 2018. 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

The company has a strategy of recycling nutrients, such as the use of the frond (pruning), application of effluent and EFB mulching. It shows a recording of the EFB applications realization in 2018 on BBB Estate. Overall, the company has made efforts to maintain and improve soil fertility. Visually, there is no symptom of nutrient deficiency at the blocks that have been visited. Until the ASA-4 assessment, the company has not carried out replanting activities, so there was no use of the palm residue after replanting.

<b>Status: Comply</b>
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### 4.3

#### Practices minimize and control erosion and degradation of soils.

##### 4.3.1 and 4.3.6

The company has a soil suitability map report issued by Mapping Division year 2014 which included a description of the soil types, topography, soil texture, drainage condition, land suitability level, and the limiting factor. The map is available on a 1: 140,000 scale. Soil types in PT BBB such as *typic tropoquepts*, *typic dystrodepts*, and *typic haplorthox*. This type has a texture of sandy and sandy clay with land suitability values in the S2 and S3 classes. The limiting factors are soil texture, drainage, topography, and rocks in the root zone. The strategy made by the company to optimize the potential of the land with the limiting factor is by providing extra organic fertilizer (empty fruit bunch) at a dose of 40 tons/ha.

Auditor conducted field observations in the EFB application area in block C14 division C and it can be concluded that the company has implemented a management strategy to optimize the potential of the land with the limiting factor by providing EFB.

##### 4.3.2

Based on the document verification of Slope Map document, known that the slope in the operational area of the company consists of 0 - 8% which is categorized as flat, 8 - 15% which is categorized as slope slightly and 15 - 25% are categorized rather steep. There are no areal with the slopes >40%. Planting strategy for areal with slope levels 21 – 40% is making conservation terraces, contour terraces, planting conservation plants such as vetiver grass and cover crop, U-shape frond stacking methods, conserving of fern (*Nephrolepis bisserata*) to keeping the soil moisture, and EFB application to enrich organic material contents in soil and reducing run off risk in rainy season. Field observations in block A13 Division A shows that the company has realized the U-shape frond stacking methods and conserving of fern (*Nephrolepis bisserata*) to keeping the soil moisture. Based on field observation in block D08, there are still several sloping areas that have not been managed. Therefore, the company has the opportunity to improve the implementation of management strategies in areas with steep slopes. **OFI**

##### 4.3.3

The company shows a road maintenance program for the 2018 and 2019 period. BBB 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 BBB Estate has reached 348,071 meters on 2018. Based on field observations throughout the audit activities, it was concluded that the road conditions on BBB Estate were in good condition and could be passed.

#### 4.3.4 and 4.3.5

According to semi detail soil survey report, there is no peat indicated in all company operational area. Hence, no peat management that planned.

<b>Status: Comply</b>
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#### 4.4

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

##### 4.4.1

The company has water management plan from POM and Estate which presented in EIA (RKL/RPL) Report 2<sup>nd</sup> Semester 2017. The plan has covers surface and ground water quality testing, biota, water used efficiency, etc. based on RKL/PRL review, it could be concluded that all parameter tested were bellows threshold as required by regulation of health minister number 492 year 2010.

##### 4.4.2

The company has HCV map with scale 1:40,000 which informs location of riparian zone within PT BBB. Furthermore, based on observation to riparian zone of Suak River in Afdeling C Block C11, it was known that HCV management program has satisfactory implemented on the field such as installation of signboard and marking of prohibited zone for agrochemicals application which presented through red paint marks on the palm.

##### 4.4.3

Waste water or mill effluent from oil palm processing was treated on the WWTP station, before flows into the permitted flatbed as land application. Mill management has conducted monthly water quality testing on WWTP outlet which carried out by Environment Agency of Jambi Province (KAN LP-143-IDN). Based on testing results on July to December 2018, it was informed that all parameter tested were bellows threshold limit as required by Minister of Environment Regulation No. 29/2003. For land application, the company has permit which presented in Decree of *Badan Satu Pintu terpadu* (Investment Board of Jambi Province) No. 07/Kep.Ka.BPTSP/VI/2016 dated June 23<sup>rd</sup> 2016, for area covers 300 ha. The permit is valid for five years (June 23<sup>rd</sup> 2021). Based field visit in *Afdeling Mawar 3* (Smallholders) Its known that the company is utilizing the liquid waste from the palm oil mill. The results of interviews with Land Application workers, known that workers do maintenance by reopening the blocked flow path and elevate the embankment for every bed Land Application to prevent runoff.

##### 4.4.4

Permit of surface water consumption is presented in Decree of Minister of General Works and National Housing No. 238/KPTS/M/2016. Based on Average of water consumption data from January to December 2018, it was informed that water consumption for oil palm processing and domestic purposes were 1.12 m<sup>3</sup>/ton FFB, respectively. This processing figure was still bellows its target which was 1.50 m<sup>3</sup>/ton FFB. Based on interview from mill management, it was informed that water retribution tax has paid every month as for example presented in receipt from Finance Agency of Jambi Province dated February 25<sup>st</sup> 2019.

<b>Status: Comply</b>
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#### 4.5

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

##### 4.5.1

The activity budgeted on the program were consist of detection, census and monitoring of pests and diseases attack, biological control such as barn owl nest installation and planting of beneficial plants. According to IPM activity records for January 2018 to February 2019 such as program and realization of rat census, leaf eating caterpillar census, and termite census, it could be concluded that all the census results were still under its economic threshold. There is no invasive species attack. This may lead to zero use of pesticides for pests and diseases control. It could be concluded that IPM techniques implemented by biological methods is effective to control pests and diseases, and also to minimize the use of chemicals. Furthermore, according to pesticides used record in 2018, agrochemical uses was only implemented for weeds control purposes.



The company has a good commitment to improve the use of pest natural predator as part of integrated pest control. One of natural predator development is the reproduction and the construction of barn owl box as a mechanism to control rat. It monitoring barn owl box occupation at least once a month. The monitored parameter are the existing of barn owl in the boxes, left food, and sign of reproduction such as egg or owl. Currently, there are total 85 barn owl boxes in PT BBB and inhabited 71 barn owl boxes. Based on field observation on harvesting, spraying and manuring activities, it was concluded that there were no significant pest attacks. This is in accordance with the result of the census.

#### 4.5.2

The company has records of the training implementation for workers who are involved in the implementation of integrated pest management, for example, Integrated Pest Management training on 21 June 2018 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.

<b>Status: Comply</b>
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#### 4.6

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

##### 4.6.1

The company has SOP and work instruction on weeds management, the guidance covering about chosen, storage, application, contaminated handling, known about signs and symptoms of pesticides poison and first aid for poison case. To ensure pesticide used are in accordance with the target, company conducted identification the type of weed found in operational area. Based on field visit and interviews with 5 pesticide applicators in block C12 Division C, it was concluded that workers knew about the function of the chemical used and selective when doing the spraying activity, as for example for glyphosate material used to spray the circle and harvesting path only while the weeds in inter row not sprayed. The company used *Isopropil amina glyphosate* and *Metil metsulfuron* which have received permission from the government. Based on document verification and observation to pesticide storage, there is no prohibited chemicals use.

##### 4.6.2

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

##### 4.6.3

PT BBB has program to reduce the pesticide usage by replacing pesticides with biological controls such as using natural predators to control rat and planting the beneficial plant. Based on document review and field observation, several IPM program with biological approach that has been implemented such as rat control by *Tyto alba*, and leaf eater caterpillar by planting beneficial plant such as *Turnera subulata* and *Casia cobanensis*. Moreover, it has also conducted early detection routinely listed in the monthly report of early warning system. There is no prophylactic use. In 2018 until February 2019, the company does not use pesticide for pest control at all.

##### 4.6.4

The company presented Internal Memo with the number 001/TAP/MIN-EST-HO/II/13 dated 22 February 2013 on the termination of paraquat herbicide reservation. The memo was issued by Estate Division Head to all CEO Region, all GM, SEM, and EM. The memo is valid from 22 February 2013. Based on document verification and field visit to pesticide storage, there is no paraquat and WHO Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions application from January 2018 until February 2019.

##### 4.6.5; 4.6.7 and 4.6.9

The results of field observation in warehouse and interview with pesticide applicator in block C12 Division C, 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 goggles. 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 BBB Estate, that known there are storage for keeping all PPE's and spraying tools after use. Pesticide operators bring their food to the field. The method to minimize the risk of negative impact is to provide a special storage area in the spray truck that is separated from the chemicals and provide clean water to clean hands before eating their food. The location of the place to eat is also set far from the area being sprayed.

#### **4.6.6 and 4.6.10**

The company has documents relating to pesticide storage in TAP/SOP/120-SHE/0001 on hazardous and toxic materials waste management. In the procedure describes the terms of storage, technical building storage, storage procedures, disposal and reporting.

The company shows evidence that any pesticide packaging has been stored and not used for other purposes such as monitoring the exit gallon of ex-pesticide packaging in 2018. In the document described the number of gallons of pesticides coming out of the central warehouse and the entry (after application of the spaciousness) to the schedule waste. Other than that CH has a permit for hazardous waste storage Number 04 / Kep.Ka.BPTSP / III / 2015 by the One Stop Integrated Service Agency located on Km Timur Road Km 58 Suko Awin Jaya Village, Sekernan District, Muaro Jambi Regency which is valid until 2020.

Based on field visit in chemical storage, known that all chemicals has been separated from other materials, labels and symbols has been installed properly as well as Material Safety Data Sheet (MSDS) and others. The result of field observation in employee lodges, there is no indication of the use of agrochemical ex-packing for other 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**

PT BBB has list of pesticide operator based on latest data of March 2019 as many as 72 workers in BBB Estate. Medical examination (cholinesterase) has been conducted on 12 October 2018 to all pesticides workers in BBB 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**

The company has a policy that prohibits pregnant and breast-feeding personnel working with chemical material. Based on interview with spraying personnel, it is known that there was neither pregnant nor breast-feeding female personnel who work with pesticide. Audit team also got information that the personnel have understood that female personnel cannot work with chemical material if they are pregnant or breast-feeding.

<b>Status: Comply</b>
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### **4.7** **An occupational health and safety plan is documented, effectively communicated and implemented.**

#### **4.7.1**

The company has a policy of occupational safety and health were written in Bahasa. The policy has been legalized and updated on 5 February 2013 by Director of PT Brahma Binabakti. 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. The policy and work program regarding occupational health safety are in accordance with Government Regulation (*Peraturan Pemerintah*) No. 50 of 2012. 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, kernel 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

The company 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 BBB Mill and agrochemical warehouse in BBB 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 BBB Estate and BBB Mill already have lisense 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.

Based on field visits and interviews with workers, the company has provided PPE to workers. PPE provided adequate and appropriate based on the results of identification of sources of hazard and risk control. PPE for type of glove, ear plug, ear muff, helmet, apron, googles and safety shoes can be replaced immediately if damaged. This is evidenced by shown the recording of PPE distribution documents to the workers and the workers recognition from interviews also confirmed it.

#### 4.7.4

The company 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

The company has procedures in case of emergencies, such as SOP of Emergencies, SOP of Fire Prevention and SOP of Fire Fighting. The procedures cover the main potential causes of emergencies such as fires and chemical spills. The procedures also explained that records of all accidents shall be kept and periodically reviewed. There is an evacuation route in the mill and office.

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. Based on field observations about first aid kit at BBB Mill (offices, warehouses and sterilizer stations) and at BBB Estate (harvesting, spraying, and fertilizer activities), it was concluded that the contents of the first aid kit were in good condition and in accordance with the list. Based on the explanation above, the Non-conformity No. 2018.02 with minor categories is closed.

BBB Estate and BBB Mill has already licensed first aid officers and there was first aid internal training conducted on 10 August 2018 which was attended by 42 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

The company has provide medical care for worker including contract and permanent worker. Medical care is covered by worker and health insurance (*BPJS*). The payment for BPJS is conducted every month according to the available rule. Besides, the company also provide medical facilities 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 workers in estate and mill, it is known that both workers 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 workers is covered by the head of contractor itself.

**4.7.7**

The company has calculated the Lost Time Accident every month for monitoring the recording of occupational accidents. It shown the Lost Time Accident calculation per February 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.

<b>Status: Comply</b>
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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:

- Manuring Training on April 2019
- Environment and OSH training to worker and contractor worker every month
- Fire management training on March, June, and August 2019
- Payroll administration training on November 2019
- Grading procedure training on January 2019
- Waste water and land application management training on October 2019
- Etc

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. Company also kept training record for each worker. Below is example of training implementation:

- Domestic waste management training on February 2<sup>nd</sup>, 2019 attended by 79 worker in Afdeling A
- Socialization of OSH and PPE on January 21<sup>st</sup> – 23<sup>rd</sup> 2019 attended by 29 worker in Afdeling F
- Grading procedure training on January 14<sup>th</sup>, 2019 attended by 14 participants
- Socialization of PPE and information request for contractor on January 28<sup>th</sup>, 2019 attended by 4 participants.
- Etc.

Based on interview with contractor, training to contractor worker is conducted by socialized the OSH policy or environment management every month by the supervisor.

<b>Status: Comply</b>
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**PRINCIPLE #5 Environmental responsibility and conservation of natural resources and biodiversity**
**5.1**

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

**5.1.1**

The company has a EIA in accordance with decree of Environmental Agency District of Muaro Jambi number 11 year 2010 for activities of palm oil plantation (Own Estate & Plasma) and mill covers ± 10,500 ha located in Subdistrict of Sekerman District of Muaro Jambi and endorsement by Head of office Environmental Agency dated on December 27, 2010. Processing Capacity is 60 tonnes FFB/hour. There is matrix revision recommendation of Environment Monitoring Plan (RKL) EIA for plantation and processing Mill of Palm oil with number decree 660.4/095/BLH.3/II/2016 dated on February 23, 2016 by Environmental Agency.

### 5.1.2

The implementation of environmental monitoring and management plan documented and reported every 6 months to related agency, such as the reporting for 2<sup>nd</sup> Semester of 2018 was on 24<sup>th</sup> January 2019 to Environmental Agency of Muaro Jambi District and Environmental Agency Jambi Province. The monitoring report is made based on matrix identification in environmental document.

### 5.1.3

Company done the environmental management and 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*. Public consultation with Environmental agency of Muaro Jambi indicate that the company has made environmental management and there is no issue of pollution caused by the company's operational activities. Companies have the opportunity to improve the quality of Reports made in accordance with KepmenLH No. 45 of 2005 concerning the guidelines for writing *RKL-RPL*. **OFI**

Status: Comply

## 5.2

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

### 5.2.1

The company has a report identification HCV PT BBB was conducted on 7-12 May 2013 by Ahmad Faisal Siregar S.Hut. MSi (HCV Consultant). Based on identification area HCV is 30.66 Ha such as Anak Mendahara River (16.77 Ha) and Suak Putat River (13.89 Ha). The methodology based on guidance identification HCV Indonesia Version II June 2008. Consultation process was involved local communities (Suko Awin Jaya Villages, Bukit Baling Villages, Suak Putat Villages and Tanjung Lanjut Villages. Peer review by Dr. Ir. Nyoto Santoso on May 2013. Based on ASA-2 audit findings regarding to riparian area, the company has re-measurement of their riparian area which is concluded that the company added perimeter of HCV in riparian area. It increasing HCV area in riparian area amount 2.12 Ha, so that the total area of HCV managed by the company is 32.78 ha.

Based on monitoring fauna 2018 in PT BBB, the type of wildlife aren't RTE Species but Least concern and Near Threatened. Such as: Python (NT), *Felis bengalensis* (CITES APP II), *Macaca fascicularis* (CITES APP II), Scandentia, *Sus crofa*, *Varanus salvator* (LC), *Elanus caeruleus*, *Alcedo meninting*, and others.

The company conducted an HCV document review on 7 January 2019 (Aksenta). A review of HCV documents was carried out for the study area of 7,227.31 Ha. Based on the results of the review, it is known that the area of HCV PT BBB is 70.09 Ha which is spread in planted areas, rivers and rubber plantation areas. The results of the review of HCV document found 9 species of mammals, 64 species of aves, 12 types of herpetofauna and 132 species of plants. As for the types of RTE found 3 types of mammals, 11 types of Aves, and 1 type of Herpetofauna. an example of an animal RTE is *coura amboinensis*.

During field visit to riparian zone of Suak River in Afdeling C Block C11, it was known that HCV management program has satisfactory implemented on the field such as installation of signboard and marking of prohibited zone for agrochemicals application which presented through red paint marks on the palm.

### 5.2.2 & 5.2.4

The biodiversity identification report has explained result of evaluation to become management and monitoring programs HCV in PT BBB for 2019 such as: Inventory and identification land cover every one year, marking of boundary HCV ever 1 year, socialization to the workers every 1 year, socialization to local communities every 1 year, monitoring flora and fauna every 1 year and reporting the report to agency related (Natural Resources Conservation Agency). based on document studies and field observations it is known that the company has carried out HCV management in accordance with the management plan. Last year monitoring result are:

- The condition of land cover in the river border area 2018.
- Marking the spray boundary in the river border area on oil palm trees.
- Wildlife patrol dated 5-11 March 2018 found 42 types of wildlife.
- Socialization to the community and HCV-related employees was carried out in July and August 2018.

Based on the results of monitoring flora fauna, observing river border conditions and interviewing employees it is known that



monitoring has been effective.

For 2018, evaluation is carried out by conducting HCV document reviews. however, the company does not yet have an HCV management and monitoring plan that refers to the latest HCV document review. **OFI**

### 5.2.3

The Company has showed the guidance handling technique *Orang utan* and protected wildlife with number of document 001/PT-HCV/III/2015 approved by CEO Group. Based on field visit sighted poster in residential area (Afdeling C), the poster informs related the type of wildlife, sanction if the workers hunting and killing the wildlife amounted to IDR 100.000.000 and prison for 5 years in accordance with regulation number 5 year 1990. Beside that, the company also installed sign board that informs of hunting wildlife prohibiting, conservation responsibility and fire awareness that located in Suko Awin Jaya Villages, Tanjung Lanjut Villages and Bukit Baling Villages.

Based on interview with some workers (harvester, pesticide applicator, security, etc.) during field visit obtained information that the company has socialized that hunting prohibition in whole plantation area. They also well-known regarding to endangered species shall protected.

### 5.2.5

Based on interview with local communities (Tanjung Lanjut and Bukit Baling) and company representatives. its known during now, there is community area is used to be as HCV area.

<b>Status: Comply</b>
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## 5.3

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

### 5.3.1

All waste products and sources of pollution have been identified and documented in identification and evaluation of pollution source document issued on 2019 such as activities in Estate office, housing, storage, workshop, laboratory, clinic, Generator room, transportation, waste mill. Furthermore for pollution such as: land clearing and replanting activities, transportation FFB, fertilizer application, pesticide application, electricity generator, and POME. The type of gasses are CO<sub>2</sub>, CO, CH<sub>4</sub>, NO<sub>2</sub>, and others.

### 5.3.2 & 5.3.3

The CH has scheduled waste storage in each unit, mill and estate. The permit of Hazardous Waste storage is in accordance with number 04/Kep.Ka.BPTSP/III/2015 by *Badan Satu Pintu terpadu* (Investment Board of Jambi Province) date on March 25, 2015 valid until 5 years. Based on field observation in hazardous waste storage in mill and estate, the waste is placed accordance with its license.

The waste is collected by the transporter of hazardous waste (CV Surya Cipta Wisesa). Document of hazardous waste transporting is in form of official report of handover and manifest. The latest handover of hazardous waste was on 7,18 and 21<sup>th</sup> February 2019, and 8<sup>th</sup> March among others:

Transportation of Hazardous waste dated 7 February 2019 with vehicles bearing BH 8621 NL

Used oil: 1.7841 tons with manifest number AUJ0001832

Used filter: 0.0480 tons with manifest number AUJ0001831

Used Lamp: 0.0155 tons with manifest number AUJ0001830

Used Rags: 0.0925 tons with manifest number AUJ0001829

Contaminated Packaging: 0.0300 tons with manifest no AUJ0001828

Used batteries: 0.0150 tons with manifest number AUJ0001833

Transportation Hazardous Waste dated 18 February 2019 with a vehicle numbered BH 8873 ME

Medical Waste: 0.0230 tons with manifest number AUJ0001878

Used Oil dated February 21, 2019 as much as 1.8 tons with manifest number AUJ0001883  
 Hazardous waste packaging dated February 21, 2019 as many 1.246 tons with manifest number AUJ0001882  
 Hazardous waste packaging dated February 27, 2019 as many as 0.21 tons with manifest number AUJ0001892  
 Used Rags dated February 28, 2019 as many 0.0260 tons with manifest number AUJ0001895  
 Used filters dated February 28, 2019 as many 0.1240 tons with manifest number AUJ0001893  
 Used oil dated March 8, 2019 as many 1.44 tons with manifest number AUJ0001922

Based on field observation in housing Afdeling D, there is no hazardous waste that is reused. The in and out wastes is recorded in hazardous waste balance sheet that updated every month. Based on interview with worker in chemical storage, ex-chemical container is re-used for pesticide mixing, other than that everything is collected at hazardous waste warehouse. So far, the company has never saved the Hazardous waste beyond the permitted period, but the company still has shortcomings in time entry, the company has the opportunity to improve the recording of Hazardous waste. Other than that the company can ensure the continuation of the management of permits for the expansion of the temporary Hazardous waste warehouse to the relevant Office. **OFI**

Domestic waste and other waste are managed in accordance with the management plan owned, domestic housing waste is disposed of in landfills, shell waste and fiber are used as boiler fuel. Based on the results of field visits to the Brahma Binabakti Mill area it is known that shells and fiber are used as fuel, while EFB is used to be applied to the field.

In ASA-3 known not all waste is well managed. in ASA-4, Based on the results of field observations at the employee housing afdeling D, it is known that the condition of is clean, there is no garbage being disposed of where it is supposed to be, and the company has provided organic and inorganic trash cans. Based on the results of interviews with the families of employees and Dyacare officers, it was found that the employees were aware of a clean Friday program at the employee hut aimed at maintaining the cleanliness of the cottage environment. on Wednesday and Saturday. Besides that the company shows some other evidence such as:

- Internal Memo No.MI / HC / XII / 2018/029 of the Human Capital Directorate dated December 10, 2018 related to the Establishment of the Employee Association Site which aims to improve kinship and togetherness and media for friendship and communication. The function of the formation of the association is a forum to discuss hygiene, reforestation, health, sports, religion, arts and security activities. One of the mandatory programs at the initial stage is a clean Friday, Green Saturday, and Healthy Sunday. Friday clean is a mutual cooperation activity to clean the emplasment area from garbage or unneeded goods which is held on Friday at 16.00.
- Minutes of socialization of Waste and Housing Environment Management from March 26 - 31 2018 to all employees and families of employees from A department to Afdeling H attended by approximately 350 employees. (photo activity and attendance attached).
- Schedule and realization of transportation of waste from housing afdeling A to H area along with the garbage transport vehicle number from January to March 2019.

Based on evidence above last year's minor nonconformity was closed.

<b>Status: Comply</b>	
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#### 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 0.032 ton/ton FFB), efficiency of fiber is 0.123 ton/ton FFB. The efficiency of fuel use is 2.68ltr/ton FFB. Efficiency use of electricity turbine 1 is 0.592 kwh/ton FFB, electricity turbine 2 is 2.689 kwh/ton FFB; Efficiency of Generator 1 is 0.214 kwh/ton FFB and efficiency of Generator 2 is 0.462 kwh/ton FFB.

<b>Status: Comply</b>	
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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 and 5.5.2**  
 Based on the technical guidance of land preparation document (No: 008/PT/II/2014) stated that whole land preparation activity may only be performed in a mechanical way using heavy equipment. According to planting year profile and field visit, there is no new land

preparation (expansion) or replanting activity was found.

**Status: Comply**

## 5.6

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

### 5.6.1 & 5.6.2

To reduce pollution and emission, the company has identified the pollution sources and emissions and the management steps which are described in SOP of Waste Management. In addition, company also identified GHG sources included management plan for reducing it. Monitoring for emission and pollutants (air emission, air ambient, odor, noise, and vibration) from estate and mill was done periodically every semester, covered on *RKL/RPL* implementation report and reported to environmental agency periodically. 2nd Semester 2018 testing result indicates all parameters related to emission are still comply with standard quality.

All waste including emmissions and pollutions sources from Mill and estate are identified and recorded on waste and pollution identification risk 2019 document. Fossil fuel reducing have been implemented by fiber and shell usage. Realization of renewable energy have been monitored on monthly report for fiber and shell usage. Waste water has been monitored every months and monitoring periods July - December 2018 sighted that all of waste water testing parameters is compliant to the standards quality. Based on field visits in the boiler station any a fiber and shell is used as fuel. Remaining fiber shell and placed so did not result in pollution and potential fire. Base on field visit in landfill in Estate Area is known there are not ex pesticide containers disposed in landfills and be divided organic and an organic trash.

### 5.6.3

The CH already monitored and reported the significant emissions and pollutions annually using RSPO palmGHG calculator, for period 2018 describes as follow (calculator ver 3.0.1):

Summary of Net GHG Emissions

Emmision per product	tCO2e/tProduct
CPO	3.37
PK	3.37

Production	t/yr
FFB processed	345289.27
CPO produced	69418.96
PK produced	18046.11

Extraction	%
OER	20.1
KER	5.23

Lan use	Ha
Planted area	4352.09
Planted on peat	0
Conservation Area	30.66

### Summary of field emission and Sinks

Description	Own crop			Group		3 <sup>rd</sup> party		
	tCO2e	tCO2e/ha	tCO2e/tFFB	tCO2e	tCO2e/tFFB	tCO2e	tCO2e/ha	tCO2e/tFFB
<b>Emissions Sources</b>								
Land conversion	30977.02	7.12	0.35					
CO2 emmisions from fertilizer	323740.59	7.52	0.37					
N2O emissions	8288.24	1.9	0.09					



Fuel consumption	1216.75	0.28	0.01	
Peat oxidation	0	0	0	
Sinks				
Crop sequestration	-40743.11	-9.36	-0.46	
Sequestration in Conservation area	-281.15	-0.06	0	
Total	32198.34	7.4	0.36	200439.68

**Summary Oil Mill Emissions and Credits**

Remarks	tCO <sub>2</sub> e	tCO <sub>2</sub> e/t FFB
<b>Emissions sources</b>		
POME	6717.82	0.19
Fuel consumption	562.89	0
Grid electricity	0	0
<b>Credits</b>		
Export of grid electricity	-5495,21	-0.02
Sales of PKS	0	0
Sales of EFB	0	0
Total	62238,5	0.18

**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

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

**Status: Comply**

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

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

**6.1.1, 6.1.2, 6.1.5**

Social impact assessment was conducted on 22<sup>nd</sup> February – 11<sup>th</sup> March 2013 by Lingkar Komunitas Sawit (LINKS) involving local communities. Social assessment has covered some aspects, such as village demographics, ethnics, religion, beliefs, economics, health services, education facilities, transportation and accessibility.

The assessment is conducted by direct interview with stakeholder, namely worker union, estate and mill worker, representative of Suko Awin Jaya, Bukit Baling, Suak Putat, and Tanjung Lanjut Village, and Akso Dano Cooperative and its member. Attached list of attendees of interview participants and minutes of meeting.

**6.1.3, 6.1.4**

The company has a social management and monitoring plan for the period of 2018. The management plan is made based on

potential issues that exist in the community based on the results of a 2015 review. Management plan involved stakeholder. The management and monitoring plan identified among other:

- Increasing community economy
- Improvement of transportation / communication facilities and social facilities of village communities
- Electricity token fee subsidy
- Production service

The management plan is based on consultation with affected parties in 2018. This plan is slightly different with previous plan. Some plan which still maintained is to maintain relationship between company and stakeholder, such as Improvement of transportation / communication facilities and social facilities of village communities.

This management plan has been implemented, for example make agreement with local contractor and smallholder, realization of CSR program, and others. Based on interview with representative of Tanjung Lanjut and Bukit Baling village, there is no negative issue with PT BBB and all issues has been covered in SIA document

The latest review for social management and monitoring plan conducted on December 27<sup>th</sup> – January 6<sup>th</sup> 2018 involved community from Suko Awini Jaya, Bukit Baling, Suak Putat, and Tanjung Lanjut Village. Based on meeting with stakeholder, There were no issues from surrounding communities that were not identified in management and monitoring plan.

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 External Relation Procedure (002/TAP/PRO-CSP-HO/XII/10). this procedure explain about person in charge for communication and consultation. the procedure is available in Bahasa Indonesia. Based on interview with statutory bodies in Muaro Jambi Regency, surrounding village, and smallholder, it is known that they understand how to communicate and consult with PT Brahma Binabakti.

### 6.2.2, 6.2.3

The PIC for consultation and communication with the community is CSR and smallholder area division. 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. Information request from stakeholder is recorded in List of Incoming and Outcoming Letter. For example: letter on February 2<sup>nd</sup> 2018 from Head of Suko Awini Jaya Village related to information about number of transportation for high school student and number of the student that use transportation from PT BBB. Company respond the letter on February 5<sup>th</sup>, 2018 by deliver the list of students and number of school bus.

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 *SOP Penyelesaian Keluhan Karyawan di Site* No SOP/SUPP/XI/2016/009 dated November 25<sup>th</sup> 2016 and *SOP Penerimaan dan Penyelesaian Keluhan dari Pemangku Kepentingan* (SOP/SUPP/III/2018/001) dated March 19<sup>th</sup> 2018 which explain handling of complaint and grievance from internal and external stakeholder. The procedure is made involve the consideration from various parties. Company must maintain the confidentiality of employees who submit complaints and ensure their safety to avoid inappropriate treatment with these employees. Based on interview with worker in estate and mill, it is known that workers understand how to deliver their complaint if any. Based on interview with representative of Tanjung Lanjut and Bukit Baling Village, it is known that they understand the mechanism to deliver their complaint if any.

**6.3.2**

Company has documented complaint from external and internal stakeholder and respond the complaint. For example:

**External stakeholder**

- Complaint on November 20<sup>th</sup> 2018 from Dano Bangko Cooperative about road maintenance in surrounded area of Dano Bangko Cooperative. Company has responded this complaint on November 22<sup>nd</sup> 2018 by showed the budget for road maintenance.
- Complaint on February 11<sup>th</sup> 2019 from contractor of FFB transporter about price of FFB loading. Company responded the complaint by sent the response letter on February 12<sup>th</sup>, 2019 which explain that contractor could submit details of increasing FFB transport prices. However, contractor has not submit the details of FFB transport price yet.

**Internal stakeholder**

- Complaint on January 31<sup>st</sup>, 2019 about water container in worker's house. Company respond the complaint by provide water container on February 7<sup>th</sup>, 2019. There is documentation of water container handover.

Based on interview with representative of Tanjung Lanjut and Bukit Baling Village and worker in estate and mill, there is no complaint which is not responded by company.

<b>Status: Comply</b>
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**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 in procedure of land acquisition (No: 002/TAP/PRO-CSP-HO/IV/10 dated 11 February 2013). The procedure is covered the process of identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation. The procedure started with planning and socialization that involving estate staff and villager representatives. Land survey and measurement of land should be involving land user in order to verify land ownership, handover estimation cost and land compensation process. The Company has no new land acquisition and the entire compensation process was completed before 2000. The results of compensation documents verification and interview with communities and previous land owners is known that compensation process are done directed to the land owner and landowners are given the freedom to release their land without coercion.

<b>Status: Comply</b>
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**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 a copy of Jambi Governor Decree No 1103/KEP.GUB/DISNAKERS-3.3/2018 about Minimum Wage of Jambi Province for 2019. The minimum wage for Jambi Province is Rp 2,423,889.16/month. Company issued internal memo No MI/HC/XII/2018/030 on December 28<sup>th</sup>, 2018 which explain that minimum wage for permanent worker is Rp 2,424,000.

Based on interview with worker, basic wage is in accordance with applicable regulation. So do the contractor workers. There is no complaint about wages payment.

Based on interview with Land Application operator, known that overtime is paid by fixed premium as much as Rp 110,000 according to Director decree No 105703/TAP/SKD-HRD-HO/IV/13 on April 19<sup>th</sup>, 2013. Company also showed:

1. Example of payslip, attendance, detail of wage payment, work order on Sundays period February 2019 for land application operator. From those documents, known that basic wage for worker is Rp 2,461,500, overtime on Sunday for 3 days and paid as much as Rp 330,000. While overtime payment according to regulation, worker has to be paid as much as Rp 598.588.
2. Example of payslip, attendance, detail of wage payment period February 2019 for mill security. Basic wage for worker is IDR 2,509,000 and overtime on holiday is paid as much as IDR 110,000. Meanwhile overtime payment according to regulation, worker has to be paid as much as IDR 203,040.

Based on explanation above, company do not paid overtime on Sunday and holiday according to regulation yet. It becomes **Non**

**Conformity No. 2019. 01**
**6.5.2**

The Company has a Collective Labor Bargaining (PKB) for the period 2018-2020 between PT BBB and IPB3 and SPSI dated October 17<sup>th</sup>, 2018. The PKB was registered at the Manpower Agency of Muaro Jambi Regency No. 560.6/30/X/02/Nakertrans on October 17<sup>th</sup>, 2018, valid from October 17<sup>th</sup> 2018 - October 17<sup>th</sup>, 2020. Based on interview with some workers in mill and estate, it is known that they understand about PKB (collective labour bargaining). There is no change of workers policy. Based on interview with harvesting workers, they are aware about deduction if the harvest unripe fruit.

While, probation worker has work agreement for 3 months probation, for example agreement No No 0097/HC/SPK/2121/12/2018 valid from December 6<sup>th</sup> 2018 until March 5<sup>th</sup>, 2019. Then, company give appointment letter become permanent worker No 00530/HC/SK/2121/03/2019 on March 5<sup>th</sup>, 2019. Work agreement is written in Indonesian Language and workers are understood the substance of the letter

**6.5.3 & 6.5.4**

Based on field observation in housing complex in Afdeling D, 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 monthly market whenever payday and from worker cooperative. Moreover, there are some kiosk in housing complex. Personnel can get the staple food with reasonable price.

<b>Major 6.5.1</b>	<b>Status: Non Conformity No 2019. 01 with Major Category</b>
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**6.6**

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

**6.6.1**

Based on company regulation period 2018 – 2020, companies respect human rights and provide equal opportunities for every employee to advance and be given the opportunity to work and organize without restrictions and discrimination or because of differences in ethnicity, religion, race, and between groups. The policy is written in Bahasa Indonesia. Based on interview with representative of worker union, 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. Also there is no conflict of interest between worker union and company. Worker union has registered to Manpower Agency of Muaro Jambi Regency.

**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 December 4<sup>th</sup>, 2018 about 2018 scholarship and Christmas celebration and January 23<sup>rd</sup>, 2019 about harvester premium pay, worker complain procedure, and scholarship. The documentation is available in office unit and available for member if they were asking.

<b>Status: Comply</b>
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**6.7**

**Children are not employed or exploited.**

**6.7.1**

Company has Recruitment Procedure No 01/TAP-HRD/PSO-RE/III/07 which explain that 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 Manpower Agency of Muaro Jambi 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.

<b>Status: Comply</b>
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<b>6.8</b> <b>Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.</b>		
<b>6.8.1 &amp; 6.8.2</b> <p>Based on company regulation period 2018 – 2020, companies respect human rights and provide equal opportunities for every employee to advance and be given the opportunity to work and organize without restrictions and discrimination or because of differences in ethnicity, religion, race, and between groups. Based on field observation and interview with spraying female worker, it is known that there is no issue or complain from worker regarding discrimination. Also, information from board 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>		
<b>6.8.3</b> <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. Company showed personal file for recruitment of 2018 such as new recruitment formulir, work agreement for probation worker, CV, school certificate, MCU result, employee assessment, and employee appointment letter No 00530/HC/SK/2121/03/2019.</p>		
	<b>Status: Comply</b>	
<b>6.9</b> <b>There is no harassment or abuse in the work place, and reproductive rights are protected.</b>		
<b>6.9.1, 6.9.2, 6.9.3</b> <p>Based on company regulation, employees must not commit immoral acts or other actions that harm the company. 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>		
	<b>Status: Comply</b>	
<b>6.10</b> <b>Growers and mills deal fairly and transparently with smallholders and other local businesses.</b>		
<b>6.10.1 &amp; 6.10.2</b> <p>Company showed "FFB Price Document" from Plantation Agency of Jambi Province for period of March 15<sup>th</sup> – March 21<sup>st</sup> 2019. Price fixing is based on CPO and Kernel prices and also adjusted for age of the plant. Based on formulas for Planters (independent smallholder/ scheme smallholder). FFB price is IDR 1,369.59,/Kg for 8 years old of palm oil, IDR 1,397.04/kg for 9 years old palm oil, and IDR 1,438.37/kg for 10 - 20 years old palm oil. The document FFB price has been known by scheme smallholder farmers by online or through mill management.</p>		
<b>6.10.3 &amp; 6.10.4</b> <p>The company has an agreement contract with cooperative and FFB Supplier, for agreement with FFB Supplier on behalf Saparuddin and agreement with Akso Dano Cooperative. 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</p> <p>Based on interviews with contractors and FFB supplier, payments are made on time. For example: The company has made a payment to DO Inez on March 19<sup>th</sup> 2019. There are no complaints related to late payments.</p>		
	<b>Status: Comply</b>	



**6.11**
**Growers and millers contribute to local sustainable development wherever appropriate.**
**6.11.1**

Company has activity plan for CSR of PT BBB period 2019, such as:

- Social, culture, religion, and health aspect: worship place maintenance
- education aspect: giving teacher salary
- infrastructure aspect: road maintenance in Suko Awin Jaya, Tanjung lanjut, Suak Putat, and Bukit Baling village
- Economy aspect: partnership with cooperative for agronomy training, etc.

Company conduct stakeholder meeting in order to determine CSR program on December 26<sup>th</sup> – 20<sup>th</sup>, 2018. stakeholder attended by representative of Suko Awin Jaya, Tanjung Lanjut, Suak Putat, Bukit Baling village (9 person).

Determination of local development programs based on meetings with surrounding village representatives together with monitoring of social impacts. Company also showed the documentation of village participation in preparation of CSR program, such as in Perpat Village on January 10<sup>th</sup>, 2019 attended by 36 participants, Cerucuk Village on January 14<sup>th</sup>, 2019 attended on 4 participants.

Implementation of CSR program for 2018, for example:

- Giving salary for honorary teacher monthly
- Giving scholarship for outstanding students
- Etc.

**6.11.2**

Company showed socialization for smallholder and independent supplier, such as:

- Agronomy socialization in Smallholder 2 on September 8<sup>th</sup>, 2018 attended by 15 participants.
- socialization of RTE on March 28<sup>th</sup>, 2018 attended by 15 participants.
- Socialization of harvest procedure and post harvest to 12 participants from DO Ifan on October 4<sup>th</sup>, 2018.
- Etc.

	<b>Status: Comply</b>	
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**6.12**
**No forms of forced or trafficked labour are used.**
**6.12.1; 6.12.2; 6.12.3**

Based on 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.

	<b>Status: Comply</b>	
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**6.13**
**Growers and millers respect human rights**
**6.13.1**

Based on company regulation period 2018 – 2020, companies respect human rights and provide equal opportunities for every employee to advance and be given the opportunity to work and organize without restrictions and discrimination or because of differences in ethnicity, religion, race, and between groups. Based on interview with worker in estate, it is known that they understand about human rights as worker. 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.

	<b>Status: Comply</b>	
<b>PRINCIPLE #7 Responsible development of new plantings</b>		
<b>7.1</b> <b>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.</b>		
<b>7.1.1, 7.1.2 &amp; 7.1.3</b> Based on the statement area, Brahma Binabakti Estate Estate did not open the land above November 2005. Land clearing was conducted in 1995. This is in accordance with email from RSPO dated March 16 <sup>th</sup> , 2018 PT Brahma Binabakti Estate has disclosed with <b>zero non compliant land clearance</b> .  Based on interview with Management representative, planted on 2006 & 2007 are Plasma and own estate PT BBB. Distribution of land is 30% for Own estate and 70% for smallholders. The last year land clearing for area planted on 2006 & 2007 was conducted in September 2004. There is cooperation agreement for land clearing on September 3 <sup>rd</sup> , 2004 between PT Kirana Sekernan with Cooperative unit of Akso Dano Village.		
	<b>Status: Comply</b>	
<b>7.2</b> <b>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.</b>		
<b>7.2.1 and 7.2.2</b> Based on the statement area, Brahma Binabakti Estate Estate did not open the land above November 2005. Land clearing was conducted in 1995. This is in accordance with email from RSPO dated March 16 <sup>th</sup> , 2018 PT Brahma Binabakti Estate has disclosed with <b>zero non compliant land clearance</b> .  Based on interview with Management representative, planted on 2006 & 2007 are Plasma and own estate PT BBB. Distribution of land is 30% for Own estate and 70% for smallholders. The last year land clearing for area planted on 2006 & 2007 was conducted in September 2004. There is cooperation agreement for land clearing on September 3 <sup>rd</sup> , 2004 between PT Kirana Sekernan with Cooperative unit of Aksadano Village.		
	<b>Status: Comply</b>	
<b>7.3</b> <b>New plantings since November 2005, have not replaced primary forest or any area required to maintain or enhance one or more High Conservation Values.</b>		
<b>7.3.1, 7.3.2, 7.3.3, 7.3.4 &amp; 7.3.5</b> Based on areal statement, Brahma Binabakti Estate not clearing land above November 2005. The land clearing was conducted on 1995 -1998. This is accordance with email from RSPO dated on March 16, 2018 (PT Brahma Binabakti with own estate) has disclosed with zero non-compliant land clearance.  Based on interview with Management representative, planted on 2006 & 2007 are Plasma and own estate PT BBB. Distribution of land is 30% for Own estate and 70% for smallholders. The last year land clearing for area planted on 2006 & 2007 was conducted in September 2004. There is cooperation agreement for land clearing on September 3 <sup>rd</sup> , 2004 between PT Kirana Sekernan with Cooperative unit of Aksadano Village.		
	<b>Status: Comply</b>	
<b>7.4</b> <b>Extensive planting on steep terrain, and/or on marginal and fragile soils, is avoided.</b>		
<b>7.4.1 and 7.4.2</b> Based on the statement area, Brahma Binabakti Estate Estate did not open the land above November 2005. Land clearing was conducted in 1995. This is in accordance with email from RSPO dated March 16 <sup>th</sup> , 2018 PT Brahma Binabakti Estate has disclosed		

with **zero non compliant land clearance**.

Based on interview with Management representative, planted on 2006 & 2007 are Plasma and own estate PT BBB. Distribution of land is 30% for Own estate and 70% for smallholders. The last year land clearing for area planted on 2006 & 2007 was conducted in September 2004. There is cooperation agreement for land clearing on September 3<sup>rd</sup>, 2004 between PT Kirana Sekernan with Cooperative unit of Aksadano Village.

**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**  
Based on the technical guidance of land preparation document (No: 008/PT/II/2014) stated that whole land preparation activity may only be performed in a mechanical way using heavy equipment. According to planting year profile and field visit, there is no new land preparation (expansion) or replanting activity was found.

Based on the statement area, Brahma Binabakti Estate Estate did not open the land above November 2005. Land clearing was conducted in 1995. This is in accordance with email from RSPO dated March 16<sup>th</sup>, 2018 PT Brahma Binabakti Estate has disclosed with **zero non compliant land clearance**.

Based on interview with Management representative, planted on 2006 & 2007 are Plasma and own estate PT BBB. Distribution of land is 30% for Own estate and 70% for smallholders. The last year land clearing for area planted on 2006 & 2007 was conducted in September 2004. There is cooperation agreement for land clearing on September 3<sup>rd</sup>, 2004 between PT Kirana Sekernan with Cooperative unit of Aksadano Village.

**Status: Comply**

**7.8**  
**New plantation developments are designed to minimise net greenhouse gas emissions.**

**7.8.1 & 7.8.2**  
Based on document review and field observation, there is no new land clearing / area expansion. Based on the statement area, Brahma Binabakti Estate Estate did not open the land above November 2005. Land clearing was conducted in 1995. This is in accordance with email from RSPO dated March 16<sup>th</sup>, 2018 PT Brahma Binabakti Estate has disclosed with **zero non compliant land clearance**.

Based on interview with Management representative, planted on 2006 & 2007 are Plasma and own estate PT BBB. Distribution of



land is 30% for Own estate and 70% for smallholders. The last year land clearing for area planted on 2006 & 2007 was conducted in September 2004. There is cooperation agreement for land clearing on September 3<sup>rd</sup>, 2004 between PT Kirana Sekernan with Cooperative unit of Akso Dano Village.

**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 a commitment to continuous improvement, including:

**Aspects of Best Management Practices:**

- Control of rat pests using owl predators (*Tyto alba*).
- Biological leaf caterpillar pests control by planting and maintaining (conservation) beneficial plants, such as *Antigonon leptosus*, *Cassia cobanensis*, and *Turnera subulata*.
- Since 2015, PT BBB was no longer using Paraquat.
- Use of the Electronic Bunch Count Chit (EBCC) application in android to collect daily FFB data and Mobile Estate applications to conduct field checks and verify daily FFB input data.

**Manpower Aspect**

- Company does not use daily labor
- Company use worker from surrounding village

**Environment:**

- The company has carried out routine reporting for all reports related to environmental management
- The company has reduced GHG emissions

The company has implemented the RSPO Internal Audit on 21-25 January 2019. Based on the results of the Internal audit conducted 10 obtained Nonconformities and all nonconformities have been closed. 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.

**Status: Comply**

### 3.2 Summary of Assessment Report of Supply Chain Requirement

#### 3.2.1. General chain of custody requirements for the supply chain

Clause	Requirement
<b>5.1</b>	<b>Applicability of the general chain of custody requirements for the supply chain</b>
<b>5.1.1</b>	<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 the Brahma Binabakti Mill. The CPO and PK transporter are under contract with PT. Brahma Binabakti, which are:</p> <ul style="list-style-type: none"> <li>• PT. Mitra Insan Persada (CPO transporter)</li> <li>• PT. Putra Hang Tuah (CPO transporter)</li> <li>• CV. Perintis Lintas Talang Duku (CPO transporter)</li> <li>• PT. Mentari Laju Jaya Usaha (CPO transporter)</li> <li>• PT. Farhan Adjie Pratama (PK transporter)</li> </ul>
	<b>Status: Comply</b>
<b>5.1.2</b>	<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 from any RSPO licensed traders. CSPO and CSPK are produced from certified FFBs processed that supplied from its own estates.</p>
	<b>Status: Comply</b>
<b>5.1.3</b>	<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 (PT. Triputra Agro Persada):</p> <ul style="list-style-type: none"> <li>• Number of RSPO membership: 1-0038-07-000-00</li> <li>• RSPO IT Platform of Brahma Binabakti Mill: RSPO_PO100001619</li> </ul>
	<b>Status: Comply</b>
<b>5.1.4</b>	<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>
	<b>Status: Comply</b>
<b>5.2</b>	<b>Supply chain model</b>
<b>5.2.1</b>	<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 -&gt; Segregated -&gt; Mass Balance.</p> <p>The organization has applied mass balance supply chain model correctly and there is no declassification. Bellows are FFB supplier for Brahma Binabakti POM:</p>

<ul style="list-style-type: none"> <li>PT Brahma Binabakti (RSPO certified).</li> <li>PT. Brahma Binabakti – HGU on process (RSPO non-certified)</li> <li>KUD Akso Dano - Plasma 1 &amp; 2 (RSPO non-certified)</li> <li>KUD Dano Bangko (RSPO non-certified)</li> <li>Independent suppliers (RSPO non-certified)</li> </ul>	
	<b>Status: Comply</b>
<b>5.2.2</b>	
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	
	<b>Status: Comply</b>
<b>5.3</b>	<b>Documented procedures</b>
<b>5.3.1</b>	
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.	
Brahma Binabakti Mill has the documents of supply chain procedures for Mass Balance models dated 22 January 2018. The procedures established and covering all elements of the supply chain model requirements, records and reports of compliance with supply chain requirements including responsibilities of each key personnel involved, definition, the FFB reception process, weighing, checking quality, processing, monitoring refined products, mass balance calculations, delivery of the product. The procedure is according to RSPO SCCS 21 November 2014, revised 14 June 2017. Based on field observation at Weighbridge station and interview with sampled person in the Mill, the operator has knowledge and able to demonstrate how to segregate an FFB's delivery notes whether Certified and noncertified sources.	
	<b>Status: Comply</b>
<b>5.3.2</b>	
The site shall have a written procedure to conduct annual internal audit	
The Procedure to conduct annual internal audit are describe in internal memo No. 02/SUST/XII/2017 dated 22 December 2017 covering all audit for sustainable palm oil including SCCS. In the SOP mentioned that internal audit are done 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 19 January 2019 with finding regarding to SCCS is certificate number of seller in selling documents. This finding has been followed up and corrected by mill.	
	<b>Status: Comply</b>
<b>5.4</b>	<b>Purchasing and goods in</b>
<b>5.4.1</b>	
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	
Brahma Binabakti Mill has not purchased CSPO or CSPK. The mill received FFB from certified and uncertified sources. Based on documents verification of FFB receives are known that all data such as name, address, date of transaction, date of issued claim, transport documentation were match without any non compliance.	
	<b>Status: Comply</b>
<b>5.4.2</b>	
The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents	
Brahma Binabakti Mill has not purchased CSPO or CSPK. The company has SOP of handling non-conforming oil palm products and/or documents describe in supply chain procedures for Mass Balance models dated 22 January 2018. Non-conforming of oil palm product has describe a false in deliveries and regarding of certified products record. The handling of	

this non-conforming are to corrected the record and monitored by mass balance record documents.	
	<b>Status: Comply</b>
<b>5.5</b>	<b>Outsourcing activities</b>
<b>5.5.1</b> 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.	
The company has the agreements with a third parties in terms of transporting CPO & PK. Examples of these contracts are as follows: <ul style="list-style-type: none"> <li>• CPO Transportation agreement with PT. Mitra Insan Persada No. 031/BBB/P-TRA-HO/V/18 dated 21 May 2018</li> <li>• CPO Transportation agreement with PT. Putra Hang Tuah No.008/BBB/P-TRA-HO/II/19 dated 7 January 2019.</li> <li>• CPO Transportation agreement with CV. Perintis Lintas Talang Duku No.007/BBB/P-TRA-HO/II/19 dated 7 January 2019</li> <li>• CPO Transportation agreement with PT. Mentari Laju jaya Usaha No.003/REV/CPO/MLJU-BB/X/2018 dated 5 October 2018.</li> <li>• PK Transportation agreement with PT. Farhan Adjie Pratama No. 010/BBB/P-TRA-HO/II/19 dated 2 January 2019</li> </ul> The fulfillment of RSPO SCCS ensure in notifications letter by the company that have been agreed by the contractors for example notification letter dated 1 March 2019 that agreed by the contractors in 20 March 2019 regarding to compliance of RSPO SCCS and that certification bodies have access to the outsourcing contractor or operation if an audit is deemed necessary.	
	<b>Status: Comply</b>
<b>5.5.2</b> Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following: <ol style="list-style-type: none"> <li>a. The site has legal ownership of all input material to be included in outsourced processes;</li> <li>b. The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</li> <li>c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</li> <li>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</li> </ol> The company has legal ownership of CPO and PK products which in the transport of CPO and PK are given to third parties. The certification bodies have access to the outsourcing contractor stated in notifications letter by the company that have been agreed by the contractors for example notification letter dated 1 March 2019 that agreed by the contractors in 20 March 2019 regarding to compliance of RSPO SCCS and that certification bodies have access to the outsourcing contractor or operation if an audit is deemed necessary.	
	<b>Status: Comply</b>
<b>5.5.3</b> 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.	
Transportation of CPO and PK has been carried out by third parties and the company has detailed records of the contractors used, as follows: <ul style="list-style-type: none"> <li>• CPO Transportation agreement with PT. Mitra Insan Persada, address Bayuasin</li> <li>• CPO Transportation agreement with PT. Putra Hang Tuah, address Jambi</li> <li>• CPO Transportation agreement with CV. Perintis Lintas Talang Duku, address Jambi</li> </ul>	

<ul style="list-style-type: none"> <li>• CPO Transportation agreement with PT. Mentari Laju jaya Usaha, address Jakarta</li> <li>• PK Transportation agreement with PT. Farhan Adjie Pratama, address Padang</li> </ul>	
	<b>Status: Comply</b>
<b>5.5.4</b> 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	
A contractor used (names and contact details) has been informed to the CB, which are: <ul style="list-style-type: none"> <li>• CPO Transportation agreement with PT. Mitra Insan Persada, address Bayuasin</li> <li>• CPO Transportation agreement with PT. Putra Hang Tuah, address Jambi</li> <li>• CPO Transportation agreement with CV. Perintis Lintas Talang Duku, address Jambi</li> <li>• CPO Transportation agreement with PT. Mentari Laju jaya Usaha, address Jakarta</li> <li>• PK Transportation agreement with PT. Farhan Adjie Pratama, address Padang</li> </ul>	
	<b>Status: Comply</b>
<b>5.6</b>	<b>Sales and goods out</b>
<b>5.6.1</b> The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form: The name and address of the buyer	
The site has developed the documents of supply chain procedures for Mass Balance models dated 22 January 2018. The minimum information related to RSPO certified products are explained in the procedure, such as: <ul style="list-style-type: none"> <li>• The name and address of the buyer;</li> <li>• The name and address of the seller;</li> <li>• The loading or shipment / delivery date;</li> <li>• A description of the product RSPO certified Mass Balance model</li> <li>• The date on which the documents were issued;</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• etc.</li> </ul> <p>That minimum information are also provided, based on verification on deliveries documents such as document of weighbridge ticket, delivery order and other invoices.</p>	
	<b>Status: Comply</b>
<b>5.7</b>	<b>Registration of transactions</b>
<b>5.7.1</b> Supply chain actors who: <ul style="list-style-type: none"> <li>• are mills, traders, crushers and refineries; and</li> <li>• 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</li> </ul> <p>Brahma Binabakti Mill has registered all transactions in RSPO IT platform.</p>	
	<b>Status: Comply</b>
<b>5.7.2</b> 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"> <li>• 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 /</li> </ul>	

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

- **Certified CPO sold to each buyer**, for example on 13 January 2019 PT PACIFIC INDOPALM INDUSTRIES 249.7 ton and 799.77 ton.

Tonnage of selling product	Volume (Ton)
CSPO sold as RSPO certified product	6,934
CSPO sold as conventional	10,455
<b>TOTAL</b>	<b>17,389</b>

- **Certified Palm Kernel sold to each buyer**  
*There is no certified PK sold in periods 26 May 2018 – 16 March 2019*

Based on the documents verification of CPO and PK shipments/sales during the period of 26 May 2018 – 16 March 2019, it is known that there are conventional PK sales (not certificate claims) taken from certified PK stock, while companies also do not claim certified PK during that period. Certified PK products sold conventionally until 16 March is: 3,233 ton. In this case, the company has not removed on palm trace for certified PK products sold conventionally. **NC 2019.03**

**Status: Non Conformity No 2019. 3 with Major Category**

## 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 9 July 2018 and 13 March 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 9 July 2018 and 13 March 2019 for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements, such as: dispatch operators, weighbridge operators, etc. Based on interview at weighbridge station is known that the weighbridge 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. Those are describe in this ASA-4 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 5 years According to the documents of supply chain procedures for Mass Balance models dated 22 January 2018. There is available at mill the record of supply chain, based on documents verification for last 2 years.

**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 12 months:

Period	CPO production (MT)			CPO Dispatch (MT)			
	Cert	Non Cert	Total	RSPO	Other scheme (ISCC)	Non Cert	Total
March 2018	1,052	2,904	3,956	-	-	4,090	4,090
April 2018	1,154	3,575	4,728	-	-	3,407	3,407
May 2018	1,254	3,868	5,122	-	-	4,153	4,153
June 2018	1,322	3,985	5,307	-	-	3,957	3,957
July 2018	1,800	5,378	7,178	-	-	5,131	5,131
August 2018	1,681	5,053	6,734	-	-	9,134	9,134
September 2018	1,871	5,587	7,458	-	-	5,007	5,007
October 2018	1,758	5,790	7,548	-	-	11,105	11,105
November 2018	1,672	4,942	6,614	3,900	-	3,893	7,793
December 2018	1,695	3,949	5,644	984	-	3,688	4,672
January 2019	1,491	4,267	5,758	2,050	-	3,776	5,826
February 2019	1,130	3,925	5,055	-	-	6,337	6,337
Total	17,880	53,223	71,102	6,934	-	63,678	70,612

Period	PK production (MT)			Cert PK Dispatch (MT)			
	Cert	Non Cert	Total	RSPO	Other scheme	Non Cert	Total
March 2018	272	820	1,092	59	-	910	970
April 2018	285	972	1,258	301	-	971	1,271
May 2018	319	983	1,302	228	-	838	1,066
June 2018	338	1,019	1,357	-	-	1,313	1,313
July 2018	439	1,313	1,752	-	-	2,102	2,102
August 2018	427	1,284	1,711	-	-	1,822	1,822
September 2018	495	1,479	1,974	-	-	2,011	2,011
October 2018	461	1,519	1,980	-	-	1,773	1,773
November 2018	449	1,328	1,777	-	-	1,542	1,542
December 2018	450	1,048	1,498	-	-	1,562	1,562
January 2019	391	1,119	1,510	-	-	1,475	1,475
February 2019	280	973	1,253	-	-	878	878
Total	4,606	13,857	18,464	588	-	17,197	17,785

**Status: Comply**

<b>5.10</b>	<b>Conversion factors</b>
<b>5.10.1</b>	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 ( <a href="http://www.rspo.org">www.rspo.org</a> ); 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.
	<b>Status: Comply</b>
<b>5.10.2</b>	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.
	<b>Status: Comply</b>
<b>5.11</b>	<b>Claims</b>
<b>5.11.1</b>	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.
	<b>Status: Comply</b>
<b>5.12</b>	<b>Complaints</b>
<b>5.12.1</b>	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/SUPP/III/2018/001 dated 19 March 2018 and work instruction No. 01/TAP/IKE-MKT-HO/II/19 dated 16 January 2019. Based on complaints document verification known that there is no complaint regarding SCCS for last 2 years.
	<b>Status: Comply</b>
<b>5.13</b>	<b>Management review</b>
<b>5.13.1</b>	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 6 February 2019.
	<b>Status: Comply</b>
<b>5.13.2</b>	The input to management review shall include information on: <ul style="list-style-type: none"> <li>Results of internal audits covering RSPO Supply Chain Certification Standard.</li> <li>Customer feedback.</li> <li>Status of preventive and corrective actions.</li> <li>Follow-up actions from management reviews.</li> <li>Changes that could affect the management system.</li> <li>Recommendations for improvement.</li> </ul>
	The content of management review related to SCCS are the result of internal audit, customer feedback, preventive and corrective actions, follow up actions and recommendations for improvement.

	<b>Status: Comply</b>
<b>5.13.3</b> The output from the management review shall include any decisions and actions related to: <ul style="list-style-type: none"> <li>• Improvement of the effectiveness of the management system and its processes.</li> <li>• Resource needs.</li> </ul>	
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.	
	<b>Status: Comply</b>

**3.2.2. Module E – CPO Mills: Mass Balance Requirements**

Clause	Requirement																								
E.1	Definition																								
E.1.1																									
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.																									
SCSS module used in Brahma Binabakti Mill is Mass Balance (MB), because the mill receives FFB from the estate that has been certified by RSPO and non-certified RSPO. Source or supplier of FFB received by the mill can be classified into three categories: own estates, smallholder and independent suppliers / third parties.																									
	Status: Comply																								
E.2	Explanation																								
E.2.1																									
The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the CB in the public summary of the P&C certification report. 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.																									
Estimate product certified CPO and PK for period 26 May 2019 – 25 May 2020 describe at this ASA-4 report (basic info 1.8.3). Actual tonnage:																									
<table><tr><td></td><td colspan="4">Tonnes/year</td></tr><tr><td rowspan="2">Products</td><td colspan="2">Period 26 May 2017 – 25 March 2018</td><td colspan="2">Period 26 May 2018 – 25 March 2019</td></tr><tr><td>Estimate</td><td>Actual</td><td>Estimate</td><td>Actual (March 2018 to February 2019)</td></tr><tr><td>CSP0</td><td>17,864</td><td>16,874</td><td>19,193</td><td>17,880</td></tr><tr><td>CSPK</td><td>4,303</td><td>4,062</td><td>4,762</td><td>4,607</td></tr></table>			Tonnes/year				Products	Period 26 May 2017 – 25 March 2018		Period 26 May 2018 – 25 March 2019		Estimate	Actual	Estimate	Actual (March 2018 to February 2019)	CSP0	17,864	16,874	19,193	17,880	CSPK	4,303	4,062	4,762	4,607
	Tonnes/year																								
Products	Period 26 May 2017 – 25 March 2018		Period 26 May 2018 – 25 March 2019																						
	Estimate	Actual	Estimate	Actual (March 2018 to February 2019)																					
CSP0	17,864	16,874	19,193	17,880																					
CSPK	4,303	4,062	4,762	4,607																					
	Status: Comply																								
E.2.2																									
The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform).																									
• RSPO IT Platform member registration number: RSPO_ PO100001619																									
Transactions are registered in RSPO IT platform as for periods Period of March 2018 to February 2019																									
• Certified CPO sold																									
<table><tr><td>Date</td><td>Volume (Ton)</td></tr><tr><td>March 2018 to February 2019</td><td>6,934</td></tr></table>		Date	Volume (Ton)	March 2018 to February 2019	6,934																				
Date	Volume (Ton)																								
March 2018 to February 2019	6,934																								
• Certified Palm Kernel sold																									
<table><tr><td>Date</td><td>Volume (Ton)</td></tr><tr><td>March 2018 to February 2019</td><td>588</td></tr></table>		Date	Volume (Ton)	March 2018 to February 2019	588																				
Date	Volume (Ton)																								
March 2018 to February 2019	588																								

	Status: Comply																																																											
E.3	Documented procedures																																																											
E.3.1																																																												
The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:																																																												
a. Complete and up to date procedures covering the implementation of all the elements in these requirements;																																																												
b. The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site procedures for the implementation of this standard.																																																												
Brahma Binabakti Mill has the documents of supply chain procedures for Mass Balance models dated 22 January 2018. The procedures established and covering all elements of the supply chain model requirements, records and reports of compliance with supply chain requirements including responsibilities of each key personnel involved, definition, the FFB reception process, weighing, checking quality, processing, monitoring refined products, mass balance calculations, delivery of the product. The procedure is according to RSPO SCCS 21 November 2014, revised 14 June 2017. Based on field observation at Weighbridge station and interview with sampled person in the Mill, the operator has knowledge and able to demonstrate how to segregate an FFB's delivery notes whether Certified and noncertified sources.																																																												
	Status: Comply																																																											
E.3.2																																																												
The site shall have documented procedures for receiving and processing certified and non-certified FFBs																																																												
Brahma Binabakti Mill has supply chain procedures for Mass Balance models dated 22 January 2018 that describes the process of FFB admissions from supplier estates. The results of field visits and verification of documents showing that the FFB received by Brahma Binabakti Mill comes from estates that have RSPO certified and RSPO uncertified area (HGU On Process, smallholders and independent suppliers). FFB from uncertified source marked on FFB delivery note. Based on field observation at Weighbridge station and interview with sampled person in the Mill, the operator has knowledge and able to demonstrate how to separated an FFB's delivery notes whether Certified and noncertified sources																																																												
	Status: Comply																																																											
E.4	Purchasing and goods in																																																											
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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:																																																												
<table><tr><th rowspan="2">Month</th><th colspan="3">FFB (ton)</th></tr><tr><th>RSPO Certified</th><th>Non Certified</th><th>Total</th></tr><tr><td>March 2018</td><td>5,036</td><td>15,233</td><td>20,269</td></tr><tr><td>April 2018</td><td>5,570</td><td>19,120</td><td>24,690</td></tr><tr><td>May 2018</td><td>6,373</td><td>19,664</td><td>26,037</td></tr><tr><td>June 2018</td><td>7,129</td><td>21,494</td><td>28,623</td></tr><tr><td>July 2018</td><td>8,365</td><td>24,986</td><td>33,351</td></tr><tr><td>August 2018</td><td>8,417</td><td>25,302</td><td>33,719</td></tr><tr><td>September 2018</td><td>9,034</td><td>26,978</td><td>36,012</td></tr><tr><td>October 2018</td><td>8,761</td><td>28,860</td><td>37,621</td></tr><tr><td>November 2018</td><td>8,336</td><td>24,644</td><td>32,980</td></tr><tr><td>December 2018</td><td>8,203</td><td>19,118</td><td>27,321</td></tr><tr><td>January 2019</td><td>7,083</td><td>20,274</td><td>27,357</td></tr><tr><td>February 2019</td><td>5,469</td><td>18,998</td><td>24,467</td></tr><tr><td>Total</td><td>87,555</td><td>264,671</td><td>352,447</td></tr></table>		Month	FFB (ton)			RSPO Certified	Non Certified	Total	March 2018	5,036	15,233	20,269	April 2018	5,570	19,120	24,690	May 2018	6,373	19,664	26,037	June 2018	7,129	21,494	28,623	July 2018	8,365	24,986	33,351	August 2018	8,417	25,302	33,719	September 2018	9,034	26,978	36,012	October 2018	8,761	28,860	37,621	November 2018	8,336	24,644	32,980	December 2018	8,203	19,118	27,321	January 2019	7,083	20,274	27,357	February 2019	5,469	18,998	24,467	Total	87,555	264,671	352,447
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**Status: Comply**
**E.4.2**
**The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.**

There is no projected overproduction of certified tonnage:

Products	Tonnes/year			
	Period 26 May 2017 – 25 March 2018		Period 26 May 2018 – 25 March 2019	
	Estimate	Actual	Estimate	Actual (March 2018 to February 2019)
CSPO	17,864	16,874	19,193	17,880
CSPK	4,303	4,062	4,762	4,607

**Status: Comply**
**E.5 Record keeping**
**E.5.1**

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

The Certificate holder has record and balance all received of RSPO FFB and deliveries of RSPO certified CPO and PK. The Volume of certified CPO and PK are delivered from accounting system according to conversion by percentage of FFB certified. The sales of RSPO product claim for period of March 2018 to February 2019 are sold from a positive stocks:

Period	CPO production (MT)			CPO Dispatch (MT)			
	Cert	Non Cert	Total	RSPO	Other scheme (ISCC)	Non Cert	Total
March 2018	1,052	2,904	3,956	-	-	4,090	4,090
April 2018	1,154	3,575	4,728	-	-	3,407	3,407
May 2018	1,254	3,868	5,122	-	-	4,153	4,153
June 2018	1,322	3,985	5,307	-	-	3,957	3,957
July 2018	1,800	5,378	7,178	-	-	5,131	5,131
August 2018	1,681	5,053	6,734	-	-	9,134	9,134
September 2018	1,871	5,587	7,458	-	-	5,007	5,007
October 2018	1,758	5,790	7,548	-	-	11,105	11,105
November 2018	1,672	4,942	6,614	3,900	-	3,893	7,793
December 2018	1,695	3,949	5,644	984	-	3,688	4,672
January 2019	1,491	4,267	5,758	2,050	-	3,776	5,826
February 2019	1,130	3,925	5,055	-	-	6,337	6,337
<b>Total</b>	<b>17,880</b>	<b>53,223</b>	<b>71,102</b>	<b>6,934</b>	<b>-</b>	<b>63,678</b>	<b>70,612</b>

Period	PK production (MT)			Cert PK Dispatch (MT)			
	Cert	Non Cert	Total	RSPO	Other scheme	Non Cert	Total
March 2018	272	820	1,092	59	-	910	970
April 2018	285	972	1,258	301	-	971	1,271
May 2018	319	983	1,302	228	-	838	1,066
June 2018	338	1,019	1,357	-	-	1,313	1,313
July 2018	439	1,313	1,752	-	-	2,102	2,102
August 2018	427	1,284	1,711	-	-	1,822	1,822



September 2018	495	1,479	1,974	-	-	2,011	2,011
October 2018	461	1,519	1,980	-	-	1,773	1,773
November 2018	449	1,328	1,777	-	-	1,542	1,542
December 2018	450	1,048	1,498	-	-	1,562	1,562
January 2019	391	1,119	1,510	-	-	1,475	1,475
February 2019	280	973	1,253	-	-	878	878
Total	4,606	13,857	18,464	588	-	17,197	17,785
.							
<b>Status: Comply</b>							

**3.3 Conformity Checklist of Certificate and Trademark Use**

<b>1.</b>	<b>Evidence of permission or approval certificate and logo from Certification Body which submitted by Client</b>	<b>X or√</b>
<b>ASA-4</b>	The company doesn't use Logo.	
	<b>Status: Comply</b>	
<b>2.</b>	<b>Implementation of certificate and logo used by Client comply with size and type (shape) against Guideline of Logo Use</b>	<b>X or√</b>
<b>ASA-4</b>	The company doesn't use Logo.	
	<b>Status: Comply</b>	
<b>3.</b>	<b>Implementation of Certificate and Logo is not used on product</b>	<b>X or√</b>
<b>ASA-4</b>	The company doesn't use Logo.	
	<b>Status: Comply</b>	
<b>4.</b>	<b>Controlling of Certificate and Logo, including withdrawing inappropriate logo.</b>	<b>X or√</b>
<b>ASA-4</b>	The company doesn't use Logo.	
	<b>Status: Comply</b>	

### 3.4 Summary of RSPO Partial Certification.

Compliance of the uncertified management units of PT Brahma Binabakti 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.

PT Brahma Binabakti is explained in table 1.10. run one (1) mill and three (3) estates (own and smallholders) in Indonesia and has achieved RSPO certified for one (1) mill and one (1) supply base in Indonesia. PT Brahma Binabakti has informed the TBP progress, MUTU has considered that PT Brahma Binabakti is comply with the RSPO requirement for TBP. The Time Bound Plan was revised and declared by PT Brahma Binabakti on 21 March 2018 approved by Director.

MUTU has verified partial certification for un-certified unit's subsidiary of PT Brahma Binabakti based on their Time Bound Plan. There are two (2) uncertified management unit of PT Brahma Binabakti. MUTU Auditor verified positive assurance against the company internal audit and supporting evidence as well as any information from others sources.

MUTU Auditor has verified company partial certification and concludes that:

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

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	Internal audit has not been done for plasma 1 & 2 locations. However, for plasma 3 (BBB Pemayung) internal audit had been done. The latest internal audit result shows that this area still not ready for certification due to latest progress of HGU process (on-going cadasteral).
2.1.2	No replacement after dates defined in NIs Criterion 7.3 of: <ul style="list-style-type: none"> <li>• Primary forest.</li> <li>• Any area identified as containing High Conservation Values (HCVs).</li> <li>• Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3.</li> </ul>	No new planting area replacing primary forest areas in accordance with principle 7.3 (after January 1, 2010) for plasma 1 and 2. For plasma 3 (BBB Pemayung) the LUCA study has been conducted to calculate the potential loss of HCV area due to land clearance without prior HCV assessment. The LUCA's document of Plasma 3 (BBB Pemayung) still under review by RSPO RaCP's Reviewer.
2.1.3	Any new plantings since January 1 <sup>st</sup> 2010 must comply with the RSPO New Plantings Procedure.	For plasma 1&2 location is not applicable for RSPO New Plantings Procedure due to its year planting. For plasma 3 (BBB Pemayung) the LUCA study has been conducted to calculate the potential loss of HCV area due to land clearance without prior HCV assessment. The LUCA's document of Plasma 3 (BBB Pemayung) still under review by RSPO RaCP's Reviewer.
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.	There is no conflicts or complaints from stakeholders regarding the operation of PT BBB's plasma 1-2-3

2.1.5	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	There are no disputes or complaints related to 1-2-3 Plasma employment
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.	Plasma still exist forest area

**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-3 Assessment**

<b>NCR No.</b>	<b>:</b>	<b>2018.1</b>	<b>Issued by</b>	<b>:</b>	<b>Andi Pratama Pasaribu</b>
<b>Date Issued</b>	<b>:</b>	<b>23 March 2018</b>	<b>Time Limit</b>	<b>:</b>	<b>ASA-4</b>
<b>NC Grade</b>	<b>:</b>	<b>Minor</b>	<b>Date of Closing</b>	<b>:</b>	<b>20 March 2019 (ASA-4)</b>
<b>Standard Ref. &amp; Requirement</b>	<b>:</b>	<b>2.2.2.</b> <b>Legal boundaries are demonstrated clearly and maintained.</b>			
<b>Non-Conformance Description &amp; Evidence observed (filled by auditor):</b>  <b>The legal territory has not been clearly demarcated.</b> Based on field visit and legal boundary observation in Block C10 Afdeling C, C15 and F7 Afdeling Afdeling G found that boundary poles located in the middle of planting area that stated as Production Forest/Conversion Production Forest. However, there is insufficient evidence that the company already has a convincing and well-implemented mechanism for separating certified and non-certified products.					
<b>Root Cause Analysis (filled by organization audited):</b>  The company has not developed a mechanism for the separation of HGU and non-HGU areas as sources of FFB					
<b>Correction (filled by organization audited):</b>  Identify this area of the HGU that intersects non-HGU areas and conducts boundary signs Making a separation mechanism for the source of FFB originating from the HGU and non HGU areas					
<b>Corrective Action (filled by organization audited):</b>  Make boundary signs and mechanisms for separating FFB sources					
<b>Assessor Evaluation and Conclusion (filled by auditor):</b>  <b>Verification on ASA 4</b> The company prepares non-certified area work instructions No. 01/BBB/III/2018 dated 22 March 2018, which has been socialized to employees on 12 April 2018. The work instructions explain the mechanism for making boundary marks for certified and non-certified areas in the form of blue paint on palm oil staples. Non-certified areas will be determined to be one harvest area and not combined with other areas. This is also proven from the results of field visits in block C10.  The company has also mapped on a 1:40,000 map scale to identify non-certified areas (424.45 ha). Then the recording in the fruit transport note is given an NS code (non certificate) to differentiate FFB from non-certified areas, for example the 4 March 2019 receipt note of 184 FFB from block O46 as non certified.  Based on the results of the verification above, The NC can be stated <b>closed</b> .					
<b>Verified by</b>	<b>:</b>	<b>Leonada</b>			

NCR No.	: 2018.2	Issued by	: Brigitta Prita
Date Issued	: 23 March 2018	Time Limit	: ASA-4 RSPO
NC Grade	: Minor	Date of Closing	: 20 Maret 2019 (ASA-4)
Standard Ref. & Requirement	4.7.5 A procedure for emergency and work accident shall be available in Indonesian language and the workers, who have attended first aids training are available in the working areas.		

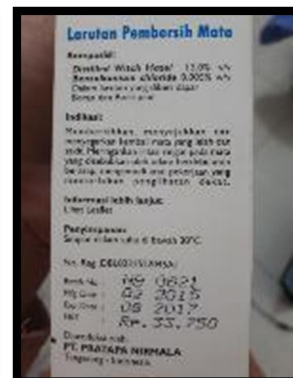
**Non-Conformance Description & Evidence observed (filled by auditor):**

**Emergency and occupational accident procedures have not been implemented properly.**

**First Aid Kit.**

Based on the results of field observations on operational activities, the auditor passed the verification related to First Aid Box and found the fact that:

- Manual Circle in Block C12 Afdeling C, found flashlight not working, monitoring usage has not been updated. The results of monitoring in February 2018 show condition of first aid box and complete item.
- Circle Path spray in Block B1 Afdeling B, found exposed eye washers and alcohol solutions have expired, rusty pin, flashlight not working, and monitoring the use has not been updated. The results of monitoring in February 2018 show condition of first aid box and complete item.
- Fertilizer in Block D10 Afdeling E, found one of the items has expired, and monitoring of usage has not been updated yet. Monitoring results In February 2018 showed the condition of first aid boxes and complete items.
- Warehouse, there is an addition item that is ointment burns and already expired in December 2017. But the CH can not show the basic of addition of the item in writing by a competent officer.
- Guest house, found expired eyewash solution, safety pins and flashlight does not exist. The results of monitoring in February 2018 show condition of first aid box and complete item.



Based on the above, known that the company has not been able to ensure the first aid box in the field has met the requirements.

**Emergency response**



The results of the field visit was also known that the supervisor of the harvest has been equipped with First Aid box, it is also found the First Aid box in the mill office, some of them are in stations and workshops. Based on the interview with the supervisor known that the supervisor had understood about first aid in case of occupational accidents in the field. He was explaining related to work accident record and its review by OHS guiding Committee. However, simulation results of fire emergency response in factory area (engine room station and press station) with hydrant known that the hose is in leak condition. The company in this case has not been able to show an effective monitoring system.

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

22 March 2018



Lack of employee understanding of the contents of first aid kit.	
<b>Correction (filled by organization audited):</b> <b>22 March 2018</b> Conducting training to warehouse employees related to the contents of first aid kit.	
<b>Corrective Action (filled by organization audited):</b> <b>22 March 2018</b> Perform routine checks on the conformity of the contents of the first aid kit.	
<b>Assessor Evaluation and Conclusion (filled by auditor):</b> <b>23 March 2018</b> The company sent evidence of improvement in the form of socialization documentation to the warehouse employees related to the contents of the first aid box, but not enough evidence is shown that the company has a good system for monitoring the contents of first aid kit. Based on that fact, this non-conformity still open.  <b>20 March 2019</b> Based on field observations about first aid kit at BBB Mill (offices, warehouses and sterilizer stations) and at BBB Estate (harvesting, spraying, and fertilizer activities), it was concluded that the contents of the first aid kit were in good condition and in accordance with the list. Based on the explanation above, the Non-conformity No. 2018.02 with minor categories is <b>closed</b> .	
<b>Verified by</b>	<b>: Brigitta Prita</b>

<b>NCR No.</b>	<b>: 2018.3</b>	<b>Issued by</b>	<b>: Brigitta Prita</b>
<b>Date Issued</b>	<b>: 23 March 2018.</b>	<b>Time Limit</b>	<b>: 22 May 2018.</b>
<b>NC Grade</b>	<b>: Major</b>	<b>Date of Closing</b>	<b>: 1 May 2018</b>
<b>Standard Ref. &amp; Requiremen</b>	<b>: 5.3.2.</b> <b>There Shall be evidence that all chemicals and their empty containers are disposed of responsible.</b>		
<b>Non-Conformance Description &amp; Evidence observed (filled by auditor):</b> There are no evidence that all chemicals and their empty container are disposed of responsible. Based on document review, the company hasn't policy or system to regulated related ban of hazardous waste used (packaging of pesticide and packaging of paint) as to water container. Based on field visit to Housing in Afdeling E BBB Estate its known workers used pesticide packaging to water container.			
			



Beside that, based on field visit to BBB Mill its known oil packaging not yet managed properly with guidance technique hazardous waste with document number PT/SUPP/II/2018/026.



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

**March 22<sup>nd</sup>, 2018.**

Insufficient of water container in employee's home and lack of knowledge regarding to chemical containers risk.

**Correction** (filled by organization audited):

Withdraw all hazardous waste contaminated packaging for other types of activities.

**Corrective Action** (filled by organization audited):

**Verification March 22<sup>nd</sup>, 2018.**

The company shows the demand documents for 200 liters of plastic drum as much as 238 drums dated March 22<sup>nd</sup>, 2018 with details:

- a. Afdeling A as many as 35 pieces.
- b. Afdeling B as many as 50 pieces.
- c. Afdeling C as many as 51 pieces.
- d. Afdeling E as many as 55 pieces.
- e. Afdeling F as many as 26 pieces.
- f. Afdeling H as many as 21 pieces.

**Verification April 17, 2018.**

1. Make rules or memos for the prohibition of using hazardous material contaminated packaging for other types of

activities.

2. Communicate to all employees not to use hazardous material for other types of activities.
3. Withdraw all hazardous material contaminated containers used by employees.
4. Replace the previous resin container using hazardous waste packaging.

**Assessor Evaluation and Conclusion (filled by auditor):**
**Verification, March 23<sup>rd</sup> 2018.**

The Company has not shown any evidence of hazardous waste identification used for water containers in each Afdeling housing, there is no evidence of hazardous waste withdrawal and evidence of socialization to the workers concerning the dangers of using chemical contaminated containers as water container. So this is not fulfilled.

**Verification, April 23<sup>rd</sup> 2018.**

The Company has shown additional improvement evidence in the form of:

- Memo Managing Director Upstream and Managing Director Trading & Downstream No. 008 / MU-DIR / III / 2018 dated March 28, 2018 regarding the Prohibition on the Use of hazardous waste Contaminated Package.
- Evidence of socialization / training of the ban on the use of hazardous waste contaminated containers on 26 - 27 March 2018 in all estate units and general affair.
- Evidence of socialization / training of the ban on the use of hazardous waste contaminated containers on 18 April 2018 to Mill workers.
- Documentation of hazardous contaminated withdrawal at boiler stations.
- Withdrawal of hazardous contaminated containers and the minutes of submission of 40 new water drum units for workers in Afdeling F on April 18<sup>th</sup>, 2018.
- The attendance list of delivery of drum clean water and withdrawal of hazardous material contaminated containers for workers in Afdeling E on April 20<sup>th</sup>, 2018.

**Verification May 1<sup>st</sup>, 2018.**

Additional evidence of improvement has been shown:

1. Minutes of meeting on the delivery of contaminated packaging of Hazardous Toxic Material to the Storage Station Warehouse Between Waste Hazardous and toxic materials on 23 April 2018 of 63 kg of contaminated packaging. News of this event is known by the manager and storage staff.
2. Examples of housing inspection documents.
3. Document inspection OHS & Environment and Housekeeping in housing PT. Brahma Binabakti. Based on the documents obtained information that the company set an inspection schedule will be done regularly 2 months. The facilities & infrastructure that became the object of inspection are offices, warehouses, workshops, polyclinics, afdeling housing, generator houses.

**Auditor's conclusion May 1<sup>st</sup>, 2018.**

Based on the evidence of improvements that have been shown, this nonconformance is stated Closed with Observation. The effectiveness of the improvement evidence is shown to be the part that will be further verified on the next assessment activity (ASA-4).

<b>Verified by</b>	<b>:</b>	<b>Brigitta Prita &amp; Andi Pratama Pasaribu.</b>
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<b>NCR No.</b>	<b>:</b>	<b>2018.4</b>	<b>Issued by</b>	<b>:</b>	<b>Brigitta Prita</b>
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<b>Date Issued</b>	<b>: 23 March 2018</b>	<b>Time Limit</b>	<b>: ASA-4</b>
<b>NC Grade</b>	<b>: Minor</b>	<b>Date of Closing</b>	<b>: 20 March 2019 (ASA-4)</b>
<b>Standard Ref. &amp; Requirement</b>	<b>: 5.3.3</b> <b>A documented waste management plan to avoid or reduce pollution and its implementation shall be available.</b>		
<b>Non-Conformance Description &amp; Evidence observed (filled by auditor):</b>  <b>Not all waste is well managed.</b> The company has showed management domestic waste in site Procedure (Estate & Mill) No. SOP/SUPP/VIII/2015/001 its stated domestic waste must grouped, trown away in garbage, and transported to landfill ever 3 days. But based on observation visit and interview with resident Afdeling E its known there is an improper waste disposal.			
<b>Root Cause Analysis (filled by organization audited):</b> There are still many employees who throw litter due to lack of awareness of cleanliness and waste management in residential areas			
<b>Correction (filled by organization audited):</b> Re-socialize to all employees			
<b>Corrective Action (filled by organization audited):</b> <ul style="list-style-type: none"> <li>- Internal Memo No. MI / HC / XII / 2018/029 regarding the Establishment of the Association of Employees on the Site where the mandatory program / activity is "Clean Friday, Healthy Saturday, and Healthy Week"</li> <li>- Make a routine garbage disposal schedule.</li> </ul>			
<b>Assessor Evaluation and Conclusion (filled by auditor):</b> <b>Verification March 21, 2019</b> <ul style="list-style-type: none"> <li>- Internal Memo No. MI / HC / XII / 2018/029 of the Human Capital Directorate dated December 10, 2018 related to the Establishment of the Employee Association Site which aims to improve kinship and togetherness and media for friendship and communication. The function of the formation of the association is a forum to discuss hygiene, reforestation, health, sports, religion, arts and security activities. One of the mandatory programs at the initial stage is a clean Friday, Green Saturday, and Healthy Sunday. Friday clean is a mutual cooperation activity to clean the emplasment area from garbage or unneeded goods which is held on Friday at 16.00.</li> <li>- Minutes of socialization of Waste and Housing Environment Management from March 26 - 31 2018 to all employees and families of employees from A department to Afdeling H attended by approximately 350 employees. (photo activity and attendance attached)</li> <li>- Schedule and realization of transportation of waste from housing in the A to H Afdeling area along with the garbage transport vehicle number from January to March 2019</li> <li>- Based on the results of field observations at the employe housing afdeling D, it is known that the condition of is clean, there is no garbage being disposed of where it is supposed to be, and the company has provided organic and inorganic trash cans. Based on the results of interviews with the families of employees and Dyacare officers, it was found that the employees were aware of a clean Friday program at the employee hut aimed at maintaining the cleanliness of the cottage environment. on Wednesday and Saturday.</li> </ul> <b>Conclusion of the Auditor March 21, 2019</b> Based on the root cause analysis, correction, preventive action and evidence of improvement shown, nonconformities are <b>Closed</b>			
<b>Verified by</b>	<b>: Bayu Yogatama</b>		

<b>NCR No.</b>	<b>: 2018.5</b>	<b>Issued by</b>	<b>: Andi Pratama Pasaribu</b>
<b>Date Issued</b>	<b>: 23 March 2018</b>	<b>Time Limit</b>	<b>: 22 May 2018</b>

<b>NC Grade</b>	<b>: Major</b>	<b>Date of Closing</b>	<b>: 7 May 2018</b>
<b>Standard Ref. &amp; Requirement</b>	<b>: General Chain of Custody 5.3.1</b> <b>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.</b>		
<b>Non-Conformance Description &amp; Evidence observed (filled by auditor):</b>  <b>Supply Chain Procedures Not Accommodating Separation of Products Derived from land use title and Non-Land use title Estates.</b> Facility has had supply chain procedure that divided into: 1. SOP of Calculation and Recording of certified FFB, CSPO & CSPK in Mass Balance Modul. 2. SOP of traceability of FFB, CPO & PK in Mass Balance Modul.  Those procedure explained that FFB from own estate claimed as certified product and FFB from associated smallholder/outgrower claimed as non-certified product. However, Based on field visit and legal boundary observation in Block C10 Afdeling C, C15 and F7 Afdeling Afdeling G found that boundary poles located in the middle of planting area that stated as Production Forest/Conversion Production Forest. In addition, the results of interviews with weighbridge operator obtained information that all the FFB delivery note from the own estate were stamped "certified". However, the FFB receiving system and procedure at weight stations has not yet accommodated the separation of FFB from own estate with HGU and non HGU status.			
<b>Root Cause Analysis (filled by organization audited):</b> Separation mechanism of FFB from HGU or non HGU area still not available yet.			
<b>Correction (filled by organization audited):</b> Providing clear and visibly legal boundary to separate FFB from HGU or non HGU area.			
<b>Corrective Action (filled by organization audited):</b> 1. Providing separation mechanism of FFB from HGU or non HGU area 2. Conducted training and socialization to harvesting supervisor and field assistant regarding to FFB separation from HGU or non HGU area. 3. Conducted training and socialization regarding to administration of FFB separation for weighbridge operators.			
<b>Assessor Evaluation and Conclusion (filled by auditor):</b> <b>Verification 23 April 2018</b> The company has shown several corrective evidence as follows: 1. Work instruction in non certified area (No. 01/BBB/III/2018) stipulated by Senior Estate Manager and Senior Mill Manager on 22 March 2018. 2. Socialization of work instruction above on 12 April 2018. But, there was no attendance list showed. 3. FFB separation training in mill on 11 April 2018 for logistic staff and weighbridge operators. 4. Minutes of meeting boundary marking (palm tree) on 5 April 2018. 5. Sample of FFB delivery note on 12 April 2018 for FFB from block O52 – O54 block C that showed the FFB separation. 6. Sample of weighbridge ticket on 12 April 2018 for FFB from block O52 – O54 block C that showed the FFB separation that has been proportioned in daily record of FFB production from certified or non certified area.  However, the company has not show the certified and non certified map and any other evidence such as weighbridge systems.			



**Auditor Conclusion on 23 April 2018**

Based on corrective evidence above, this non conformance still open.

**Verification 7 May 2018**

The company has demonstrated separation mechanism during auditor and auditee meeting on 7 May 2018. The demonstration covering separation mechanism started from FFB harvesting, counting in collection spot, FFB delivery note, weighbridge and proportioned in daily record of FFB production from certified or non certified area by logistic staff under mill manager supervision as supply chain controller.

**Auditor Conclusion 7 May 2018**

Based on corrective evidence showed, this non conformity has **Closed with Observation**. Effectivity of the mechanism will be verify on the next assesment.

**Verified by** : **Andi Pratama Pasaribu**

NCR No.	: 2018.6	Issued by	: Andi Pratama Pasaribu
Date Issued	: 23 March 2018	Time Limit	: 20 June 2019
NC Grade	: Minor Raised to Major	Date of Closing	: 20 June 2019
Standard Ref. & Requirement	RSPO Certification System Clause 4.2.3. The unit of certification shall be the mill and its supply base: All the FFB from the directly managed lands (or estates) shall be produced to certifiable standards. The mill will develop and implement a plan to ensure that 100% of associated smallholders and outgrowers are of certifiable standard within 3 years.		
Non-Conformance Description & Evidence observed (filled by auditor):  Not all associated smallholder has implemented RSPO standard Based on document verification and interview with related stakeholder obtained information that the company has had partnership contract with village cooperative unit (KUD) Akso Dano (for Plasma 1 & 2) and KUD Dano Bangko which is categorized as associated smallholder. The results of interviews with management of KUD and FFB received reports in mill are known that the associated smallholders consistently supply FFB to the mill. Until ASA-3 audit, there is no evidence that all associated smallholder have implemented RSPO standard.			
Root Cause Analysis (filled by organization audited):  KUD Akso Dano: the company has conducted socialization about RSPO certification, but plasma management and farmers stated that they were not ready to submit the certification process.  KUD Dano Bangko: Based on the results of the internal audit that has been conducted, plasma Pemayang does not have proper legality to be submitted in the RSPO certification process (HGU and SHM)			
23 May 2019 RSPO certification has not been done for KUD Akso Dano (Plasma 2) because based on the statement letter from the chairman of KUD Akso Dano representing members including the independent farmer groups in it, the board of KUD Akso Dano has not been willing to be audited due to limited costs and resources.			



**Correction** *(filled by organization audited):*

Revise the certification timebound plan  
Making the achievement timeplan of the KUD Dano Bangko

**23 May 2019**

Re-communicated to KUD Akso Dano Board regarding the RSPO certification process to be carried out for the Plasma 2 KUD Akso Dano

**Corrective Action** *(filled by organization audited):*

Meet the plasma certification timebound plan that has been entered in the partial form of certification  
Fulfill the timetable for achieving the KUD Dano Bangko

**23 May 2019**

Make a letter to RSPO that PT BBB is committed to conducting RSPO certification to Plasma 2 but requires a long enough process so that it is requested to arrive at Recertification in 2020 by attaching the KUD Akso Dano plasma 2 activity plan

**17 June 2019**

Regarding the cost and resource constraints, the company will assist with the implementation of the RSPO KUD Akso Dano certification process (Plasma 2)

**Assessor Evaluation and Conclusion** *(filled by auditor):*
**Verification on ASA-4**

Based on the results of the documents verification, interview with smallholders cooperative are known as follows:

**KUD Akso Dano (Plasma 1)**

The partnership was based on the agreement dated 6 February 1995. Based on the agreement, it was known that the agreement was started from the construction of the plantation by the company and was managed by the company until The farmers settled the credit. Article 15 also states that the agreement applies only until the farmers settled the credit. Currently plasma 1 farmers have completed credit and managed plasma land by each farmer, while FFB can be sent to Brahma Binabakti Mill based on the sale and purchase agreement No. TBS.123456/BBB/PER-CSR-SK/V/16 dated 18 May 2016.

But the FFB sale and purchase agreement is not binding on the farmer to always send FFB to the company, the farmers have the freedom not to sell their FFB to the company. This FFB sale and purchase agreement is only as a basis if the farmer sends FFB to the company, arranges price, payment, quality requirements etc. This was also confirmed by the cooperative management, during an interview.

**KUD Akso Dano (Plasma 2).**

The partnership was based on the agreement dated 3 September 2004. According to the agreement, it was known that the agreement was started from the construction of the plantation by the company, while the subsequent plantation management was carried out by each farmer. For FFB, it is required to be sent to the company's mill for one cycle of oil palm plants ( $\pm$  20 years), as stated in article 5 paragraph 2. So that the current FFB is still exclusively sent to the company's mill.

### KUD Dano Bangko

The Partnership is based on agreement No. 001/SPK/DB-BBB/I/2012 dated 30 January 2012. According to the agreement, it is known that cooperation is bound to one cycle of oil palm plants (25-35 years). For management carried out by the company (full managed) as stated in article 8 paragraph 1.e and article 9 paragraph 1.c. So in this case, the area of the farmer is directly managed land by the company and becomes part of the management unit of PT. Brahma Binabakti that must be carried out by RSPO certification, with reference to the timeboundplan prepared by the company.

Based on the description above it can be concluded that:

- KUD Akso Dano (Plasma 1) is not required to apply the RSPO standard because the existing agreement is only temporary sale of FFB and is an independent supplier.
- KUD Akso Dano (Plasma 2) is required to implement the RSPO standard because it is associated smallholders with the agreement to develop plasma plantations and sending FFB to companies exclusively.
- KUD Dano Bangko is required to follow RSPO certification because the management is carried out directly by the company and is part of the management unit of PT. Brahma Binabakti. For the timing of the certification implementation, it can follow the timeboundplan.

From the above conclusions, Minor non-conformity in ASA-3 cannot be closed and **increases to Major non-conformity in ASA-4. Particularly related to the application of the RSPO standard for KUD Akso Dano (Plasma 2).**

### Verification 29 May 2019

The company shows the evidences, such as:

- Timebound plan for KUD Dano Bangko certification on 2020.
- RSPO Socialization to KUD Akso Dano (lasma 2) on 3 Mei 2019
- Certificaton plan for KUD Akso Dano (Plasma 2) which the assesment will conduct on March 2020
- Email from RSPO ([aminah.ang@rspo.org](mailto:aminah.ang@rspo.org)) which stated that scheme smallholders can be certified at recertification of PT. Brahma Binabakti.

The proof of improvement above has been accepted, but the improvement is still incomplete according to the analysis of the root cause, namely the management of KUD Akso Dano is not yet willing to be audited due to limited costs and resources. Based on this, the non compliance cannot be stated as closed.

### Verification 20 June 2019

The company has committed in terms of financing RSPO certification for KUD Akso Dano to be assisted by the company. Based on this, this Non compliance can be declared closed.

Verified by	:	Leonada
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**3.5.2. Identification of Findings, Corrective Actions and Observations at ASA-4 Assessment**

<b>NCR No.</b>	<b>: 2019.1</b>	<b>Issued by</b>	<b>: Asystasya Aishah Silalahi</b>
<b>Date Issued</b>	<b>: 21 March 2019</b>	<b>Time Limit</b>	<b>: 20 June 2019</b>
<b>NC Grade</b>	<b>: Major</b>	<b>Date of Closing</b>	<b>: 20 June 2019</b>
<b>Standard Ref. &amp; Requirement</b>	<b>: 6.5.1</b> <b>Documentation of pay and conditions for employees based on the existing manpower regulation shall be available</b>		
<b>Evidence observed &amp; Non-Conformance Description (filled by auditor):</b>  <p>Based on interview with Land Application operator, known that overtime is paid by fixed premium as much as Rp 110,000 according to Director decree No 105703/TAP/SKD-HRD-HO/IV/13 on April 19<sup>th</sup>, 2013. Company also showed:</p> <ol style="list-style-type: none"> <li>1. Example of payslip, attendance, detail of wage payment, work order on Sundays period February 2019 for land application operator. From those documents, known that basic wage for worker is Rp 2,461,500, overtime on Sunday for 3 days and paid as much as Rp 330,000. While overtime payment according to regulation, worker has to be paid as much as Rp 598.588.</li> <li>2. Example of payslip, attendance, detail of wage payment period February 2019 for mill security. Basic wage for worker is IDR 2,509,000 and overtime on holiday is paid as much as IDR 110,000. Meanwhile overtime payment according to regulation, worker has to be paid as much as IDR 203,040.</li> </ol> <p>Based on explanation above, company do not paid overtime on Sunday and holiday according to regulation yet.</p>			
<b>Root Cause Analysis (filled by organization audited):</b> <b>13 June 2019</b> <p>Company did not review yet Director Decree No. 105703/TAP/SKD-HRD-HO/IV/13 on 19 April 2013 about Premium payment in Holiday/Sunday.</p>			
<b>Correction (filled by organization audited):</b> <b>13 June 2019</b> <p>Reviewing the Directors Decree No. 105703 / TAP / SKD-HRD-HO / IV / 13 and adjust to the applicable regulations</p>			
<b>Corrective Action (filled by organization audited):</b> <b>13 June 2019</b> <p>Review the Director Decree No. 105703/TAP/SKD-HRD-HO/IV/13 and adjust it with applicable regulation.</p>			
<b>Assessor Evaluation and Conclusion (filled by auditor):</b>  <b>Verification on 20 June 2019</b> <p>Company showed correction evidence, as follows:</p> <ul style="list-style-type: none"> <li>- Director decree No. SKD/DOE/VI/2019/033 about premium payment for Security in Sumatera Region issued on 19 June 2019. This decree is applied after 1 July 2019.</li> <li>- Director decree No. SKD/DOE/VI/2019/032 about productivity premium payment for land application worker in holiday in Sumatera Region issued on 19 June 2019. This decree is applied after 1 July 2019. Based on the document, premium payment on holiday is Rp 650/m<sup>3</sup>.</li> </ul> <p>Based on those documents, this nonconformity is <b>closed</b> and the implementation of the decree will be verified in next assessment.</p>			
<b>Verified by</b>	<b>: Asystasya Aishah Silalahi</b>		

NCR No.	: 2019.02	Issued by	: Leonada
Date Issued	: 21 March 2019	Time Limit	: 20 June 2019
NC Grade	: Major	Date of Closing	: 20 June 2019
Standard Ref. & Requirement	<b>General COC 5.7.2</b> 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"><li>• <b>Shipping Announcement / Announcement:</b> 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.</li><li>• <b>Trace:</b> 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.</li><li>• <b>Remove:</b> RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.</li><li>• <b>Confirm:</b> Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.</li></ul>		
<b>Evidence observed &amp; Non-Conformance Description</b> (filled by auditor):  Based on the documents verification of CPO and PK shipments/sales during the period of 26 May 2018 – 16 March 2019, it is known that there are conventional PK sales (not certificate claims) taken from certified PK stock, while companies also do not claim certified PK during that period. Certified PK products sold conventionally until 16 March is: 3,233 ton. In this case, the company has not removed on palm trace for certified PK products sold conventionally.			
<b>Root Cause Analysis</b> (filled by organization audited): <b>23 May 2019</b> Lack of understanding PIC for removing stock if there are certified products sold conventionally  <b>17 June 2019</b> There are no procedures related to the regulation of removing stock			
<b>Correction</b> (filled by organization audited): <b>23 May 2019</b> Removing certified PK that has been sold conventionally			
<b>Corrective Action</b> (filled by organization audited): <b>23 May 2019</b> Conducted socialization / training to PIC regarding SCCS  <b>17 June 2019</b> Make Work Instructions regarding removing stock at the Palm Trace			
<b>Assessor Evaluation and Conclusion</b> (filled by auditor): <b>Verification 29 May 2019</b>			

<p>The company show evidences, such as:</p> <ul style="list-style-type: none"> <li>- Removing stock of CSPK on palm trace 3,535 ton dated 4 April 2019 for conventional sold volume</li> <li>- Training on 12 April 2019 for PIC SCCS</li> </ul> <p>The Evidence e above is acceptable, but the company needs to complete the root cause analysis and corrective action along with the evidence of the corrective action. Based on this, the non compliance cannot be stated as closed</p> <p><b>Verification 20 June 2019</b></p> <p>The company shows the instructions for removing stock CPO and PK on Palm trace No.124271 / TAP / IK-SUS-HO / VI / 19 dated 17 June 2019. Based on this, these nonconformities can be declared closed</p>	
<b>Verified by</b>	<b>: Leonada</b>

<b>NCR No.</b>	<b>: 2019.03</b>	<b>Issued by</b>	<b>: Leonada</b>
<b>Date Issued</b>	<b>: 21 March 2019</b>	<b>Time Limit</b>	<b>: 20 June 2019</b>
<b>NC Grade</b>	<b>: Major</b>	<b>Date of Closing</b>	<b>: 20 June 2019</b>
<b>Standard Ref. &amp; Requirement</b>	<b>: Certification system clausul 4.5.3 Timebound plan</b>		
<p><b>Evidence observed &amp; Non-Conformance Description (filled by auditor):</b></p> <p>PT. Triputra Agro Persada as the holding company of PT. Brahmana Binabakti has a timebound to certify the management units of PT. Triputra Agro Persada, the following:</p> <ul style="list-style-type: none"> <li>- PT. Brahma Binabakti</li> <li>- PT. Gawi Bahandep Sawit Mekar</li> <li>- PT. First Lamandau Timber International</li> </ul> <p>Meanwhile PT. Triputra Agro Persada is also a holding company and has management control over the following companies:</p> <ul style="list-style-type: none"> <li>- PT. Muaratoyu Subur Lestari</li> <li>- PT. Etam Bersama Lestari</li> <li>- PT. Hamparan Perkasa Mandiri</li> </ul> <p>In this case, the company has not been able to show a timebound plan for all management units of PT. Triputra Agro Persada along with the results of a partial audit for the those units.</p>			
<p><b>Root Cause Analysis (filled by organization audited):</b></p> <p><b>17 June 2019</b></p> <p>The three companies are not included in the RSPO Certification Time Bound Plan because they are still in the internal process of meeting sustainability (sustainability compliance)</p>			
<p><b>Correction (filled by organization audited):</b></p> <p><b>17 June 2019</b></p> <p>Revise RSPO Certification of the Time Bound Plan for units that have not been included in the TAP management unit</p>			
<p><b>Corrective Action (filled by organization audited):</b></p> <p><b>17 June 2019</b></p>			

Ensure that new TBPs include TAP business units that have not been included in the previous TBP along with a partial certification of these units.

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

**Verification 20 June 2019**

Revised timebound plan 17 June 2019 by management of PT. Brahma Binabakti with additions:

- PT. Muaratoyu Subur Lestari plan to certify at 2021
- PT. Etam Bersama Lestari plan to certify at 2022
- PT. Hamparan Perkasa Mandiri plan to certify at 2022

Based on evidence above, analysis of the root cause and the corrective action shown, the nonconformity can be stated as closed.

**Verified by** : **Leonada**



**3.5.3. Opportunity for Improvement**

No	Ref. Std.	Description
1	2.3.2	Land acquisition for the HGU area that has not been compensated
2	4.1.1	Company still have the opportunity to improve the management of EFB in the field according to the procedures they have
3	4.3.2	Company has the opportunity to improve the implementation of management strategies in areas with steep slopes
4	5.1.3	Companies have the opportunity to improve the quality of Reports made in accordance with KepmenLH No. 45 of 2005 concerning the guidelines for writing <i>RKL-RPL</i>
5	5.2.2	Review the HCV management plan with the latest HCV review document
6	5.2.4	Review the HCV monitoring plan with the latest HCV review document
5	5.3.2	Company can ensure the continuation of the management of permits for the expansion of the temporary Hazardous waste warehouse to the relevant Office

**3.5.4. Noteworthy Positive Components**

No	Ref. Std.	Description
1	-	Commitment of PT BBB to implement the principles of sustainable palm oil plantation management.
2	-	Company has obtained ISPO certificate
3	-	Award from the Ministry of Environment (Corporate Performance Rating Program in Environmental Management - Blue PROPER for 2017 - 2018).
4	-	Document presentation, staff competency on relevant aspects and good communication
5	-	Decrease in GHG emissions
6	-	Use of the Electronic Bunch Count Chit (EBCC) application in android to collect daily FFB data and Mobile Estate applications to conduct field checks and verify daily FFB input data

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

Public Issues (Institution/ NGO/Community)	Auditor Verification
<b>Local contractor of FFB transporter</b> <b>Interviewed with Lahuri</b> <ul style="list-style-type: none"> <li>- Contractor has 13 units of trucks and all drivers has provided by PPE from PT BBB.</li> <li>- Work accident and medical insurance is provided by the contractor.</li> <li>- Work agreement between contractor and PT BBB will be renewed every 6 months.</li> <li>- There is no complaint about contractor payment.</li> <li>- There is one complaint about price of FFB transported. Contractor has suggested the new price to PT BBB.</li> </ul>	<p>Auditor has verified the compliance according to criterion 4.7, 6.3, and 6.10</p>
<b>Akso Dano Cooperative (Smallholder Cooperative)</b> <b>Interviewed with Cooperative manager</b> <ul style="list-style-type: none"> <li>- Cooperative consist of two smallholder, smallholder I and smallholder II.</li> <li>- FFB price is in accordance with price set by plantation agency.</li> <li>- FFB must be supplied to PT BBB Mill, except for Smallholder I, FFB could be supplied to other mill.</li> <li>- Payment is made in 3 stages. Payment is made on time.</li> </ul>	<p>Auditor has verified the compliance according to criterion 6.10</p>
<b>Local contractor of Mechanical and Civil</b> <b>Interviewed with CV Multi Guna Usaha</b> <ul style="list-style-type: none"> <li>- There is a work agreement between PT BBB and CV Multi Guna Usaha.</li> <li>- Payment is made on time</li> <li>- PT BBB provided housing for contractor worker.</li> <li>- Work accident and medical insurance is covered by contractor</li> <li>- PPE is provided by contractor</li> </ul>	<p>Auditor has verified the compliance according to criterion 4.7 and 6.10</p>
<b>Worker union (IPB3)</b> <ul style="list-style-type: none"> <li>- Internal meeting is conducted once a month</li> <li>- Company is supported IPB3 activities by provided office, computer, etc.</li> <li>- All complaint from worker is handled well</li> <li>- Minimum age for worker is 18 years old.</li> <li>- All worker are covered by medical and work accident insurance. Company also provided medical facility (Polibun)</li> <li>- There is no issue related to worker welfare.</li> </ul>	<p>Auditor has verified the compliance according to criterion 6.5, 6.6, 6.7, 6.8, 6.9, and 6.12</p>


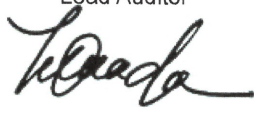
Public Issues (Institution/ NGO/Community)	Auditor Verification
<b>Worker Unions of Brahma Binabakti Mill (Chief)</b> <ul style="list-style-type: none"> <li>• Worker Unions have been registered with the Social and Employment Agency of Muaro Jambi Regency.</li> <li>• The company has made collective labor agreement (PKB) with worker unions for the period 2018 - 2020.</li> <li>• Communication of companies with union representatives is good and regular meetings are routine conducted every month.</li> <li>• Worker Unions routinely conduct internal meetings to obtain aspirations from employees.</li> <li>• All employees are free to become worker unions members and there is no coercion.</li> <li>• There is no issue regarding wages.</li> <li>• There is no issue regarding child labor.</li> <li>• The company has committed to provide PPE to each of its employees and will be replaced if it is damaged.</li> </ul>	<p>Auditor has verified the compliance according to criterion 6.5, 6.6, 6.7, 6.8, 6.9, and 6.12</p>
<b>Gender committee</b> <ul style="list-style-type: none"> <li>- Activity of gender committee is socialization about the mechanism to report sexual harassment, reproductive rights for women worker.</li> <li>- Company provided menstrual leave (2 days) and maternal leave (1.5 months before and 1.5 months after maternity) to women worker.</li> <li>- Pregnant and breastfeeding worker is not allowed to work with chemical material.</li> <li>- Company provided special break time for breastfeeding.</li> <li>- There is no issue related to sexual harassment.</li> </ul>	<p>Auditor has verified the compliance according to criterion 6.9</p>
<b>Dano Bangko Cooperative</b> <ul style="list-style-type: none"> <li>- There is a MoU between PT BBB and Dano Bangko Cooperative, valid for one cyclus of oil palm.</li> <li>- Payment is made 3 stage. There is no complaint about payment.</li> <li>- All operational activities is done by PT BBB. The deduction cost of operational activities is made transparent in payment slip. The committee is aware about this.</li> <li>- FFB is supplied to PT BBB.</li> <li>- FFB price is in accordance with price set by plantation agency.</li> </ul>	<p>Auditor has verified the compliance according to criterion 6.10</p>
<b>FFB Supplier (Mr Junaidi AR)</b> <ul style="list-style-type: none"> <li>• Already cooperating in FFB supply for 20 years.</li> <li>• Cooperation in buying and selling FFB is set forth in a legal work agreement.</li> <li>• Every day at least send 50 tons of FFB to the PT BBB palm oil mill.</li> </ul>	<p>Auditor has verified the compliance according to criterion 1.1, 6.3, and 6.10</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> <li>The company has surveyed the origin of FFB suppliers.</li> <li>FFB payments are always on time and paid every day.</li> <li>Communication with the company is good and there are no problems.</li> </ul>	
<b>FFB Supplier (Mr Jatmiko)</b> <ul style="list-style-type: none"> <li>Already cooperating in FFB supply for 20 years.</li> <li>Cooperation in buying and selling FFB is set forth in a legal work agreement.</li> <li>Every day at least send 40 tons of FFB to the PT BBB palm oil mill.</li> <li>The company has surveyed the origin of FFB suppliers.</li> <li>FFB payments are always on time and paid every day.</li> <li>Communication with the company is good and there are no problems.</li> <li>The company provides training to farmers who will send their FFB to the PT BBB palm oil mill.</li> </ul>	<p>Auditor has verified the compliance according to criterion 1.1, 6.3, and 6.10</p>
<b>Employee Cooperative of Brahma Binabakti (Field Coordinator dan Secretary)</b> <ul style="list-style-type: none"> <li>Employee cooperatives have been formed since 2013 and already have notary deed documents.</li> <li>Employee cooperatives provide basic needs, savings and loans and electronic equipment.</li> <li>Has 305 members.</li> <li>Have conducted an annual member meeting for the 2017 period on 15 February 2018.</li> <li>Membership obligatory contributions of Rp100,000 and monthly membership fees of Rp50,000.</li> <li>Net income (SHU) is distributed annually.</li> <li>The company greatly support employee cooperatives in providing buildings and assisting vehicles.</li> </ul>	<p>Auditor has verified the compliance according to criterion 6.5</p>
<b>Plantation Agency, Muaro Jambi District Monday, 18 March 2019</b> <ul style="list-style-type: none"> <li>The relationship between the Company and the Agency is well established</li> <li>The company is cooperative in providing information</li> <li>Reports are regularly reported.</li> <li>The latest PUP has been held on March 15, 2019</li> <li>There is no fire history in the PT BBB management area</li> <li>Fire emergency response equipment is adequate</li> <li>Management of Smallholders has been running well now</li> <li>CSR is carried out by the company well, such as assistance with doctor fees at the puskesmas, providing scholarships, supplying masks during the smoke season, providing social funds for holidays, and repairing roads.</li> </ul>	<p>It has been verified in accordance Criterion 1.1, 2.2, 2.3, 4.1, 5.2, 5.5, 6.2, 6.3, 6.8, 6.10 and 6.11.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> <li>• Determination of slamholders prices based on Plantation Agency prices which are issued regularly every month</li> <li>• There is no indigenous/customary community in the PT BBB management area</li> <li>• PT BBB management area is a Mineral area, there is no Peat area</li> </ul>	
<b>Environmental Agency District of Muaro Jambi.</b> <b>Tuesday, 19 March 2019</b> <ul style="list-style-type: none"> <li>• The relationship between the Company and the Agency is well established</li> <li>• The company is cooperative in providing information</li> <li>• Reports are regularly reported regularly. such as the <i>RKL/RPL</i> report, liquid waste report, hazardous waste report,</li> <li>• The company has permits for the application of liquid waste (land application), hazardous waste storage and Domestic Waste permits.</li> <li>• The company is in the stage of assessing the addition of the area of application of liquid waste, from 300 Ha to 600 Ha</li> <li>• There is no information about pollution from surrounding communities.</li> </ul>	<p>It has been in accordance with Criterion 1.1; 5.1 and 5.3.</p> <p>Related to the document filing has been verified by the auditor, all reports have been carried out in accordance with the regulations.</p> <p>The company already has environmental documents specified in indicator 5.1.1</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>
<b>Man Power and Transmigration Agency of Muaro Jambi District.</b> <b>Tuesday, 19 March 2019</b> <ul style="list-style-type: none"> <li>- The relationship between the Company and the Agency is well established</li> <li>- Cooperative company in providing information</li> <li>- Reports are regularly reported such as <i>WLTk</i> online, P2K3 reports.</li> <li>- Reports are sent to provinces and districts.</li> <li>- All employees have been facilitated by <i>BPJS</i> health and <i>BPJS</i> employment</li> <li>- During 2018 until now there have been no cases of employment relationship disputes</li> <li>- The company routinely records employees, whether contract or permanent.</li> <li>- Every new employee is always listed.</li> <li>- Wages refer to the Jambi minimum wages Province 2,423,889.16 Rupiah</li> </ul>	<p>It has comply with criterion 6.2; 6.3; 6.4; 6.6; 6.7; 6.8; 6.9 and 6.12.</p>
<b>National Land Agency of Muaro Jambi District</b> <b>Tuesday, 19 March 2019</b> <ol style="list-style-type: none"> <li>1. The company has own land legality of their own operational area.</li> <li>2. There is no land conflict regarding to PT. Brahma Binabakti that handled by National Land Agency of Muaro Jambi</li> </ol>	<p>It has been accordance with criterion 2.2 and 2.3.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>District now.</p> <p>3. The company has reported their annual land use to the National Land Agency of Muaro Jambi District.</p>	
<p><b>Surrounding Communities and previous landowner:</b></p> <ul style="list-style-type: none"> <li>• <b>Tanjung Lanjut Village.</b></li> <li>• <b>Bukit Baling Village</b></li> <li>• The communication and relation between villages around with company are well maintained, the company's public relation already known by the communities. The mechanism for complaint and grievance submission has been understood well by the community</li> <li>• There were no significant land disputes and no indication of contractually army or paramilitaries using in plantation area. Conflict and resolution with company has settled up through spirit of kinship..</li> <li>• There are no indigenous rights or customary rights. It also known that compensation process are done directed to the land owner and landowners are given the freedom to release their land without coercion</li> <li>• The company has considered satisfactory cooperative and transparent in providing information, for example towards job vacancies. FFB price, CSR and grants. Village people has recognize company representative (PIC) from Division of Public Relation (PR) which handled this matters.</li> <li>• The company has cooperation with local contractors from surrounding villages.</li> <li>• There is no complaints and issues from surrounding villages towards environment aspects</li> </ul>	<p>Based on interview result, it could be concluded that presence of company has considered positively affected surrounding community life and contribute to social economic improvement. Communication and coordination towards conflict resolution has smoothly carried out. Department of Public Relation has good relationship with village representatives. Hence, social and environment aspects were satisfactory taken as a part or company operational activity. Further detail from other stakeholder views and document review could be checked on Criteria 1.1, 1.2, 2.2, 5.1, 6.1, 6.2, 6.3, 6.4, 6.8, 6.10 and 6.11 in this report.</p>



4.0	<b>CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY</b>
4.1	<b>Formal Sign-off of Assessment Findings</b>
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;"> <p>PT Brahma Binabakti Director</p>  <p><b>George Oetomo</b> Thursday, 20 June 2019</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><b>Leonada</b> Thursday, 20 June 2019</p> </div> </div>

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

No	Institution/NGO/Community	Address	Phone/Email	Form of Communication	Date of Contact	Response	
						Yes	No
1	National Land Agency	Muaro Jambi Regency	-	Visit and Interview	19 March 2019	✓	
2	Environment Agency	Muaro Jambi Regency	-	Visit and Interview	19 March 2019	✓	
3	Plantation Agency	Muaro Jambi Regency	-	Visit and Interview	18 March 2019	✓	
4	Manpower Agency	Muaro Jambi Regency	-	Visit and Interview	19 March 2019	✓	
5	Akso Dano and Dano Bangko Cooperative	PT BBB	-	Interview	19 March 2019	✓	
6	Village of Tanjung Lanjut and Bukit Baling	Sub District of Sekernan, District of Muaro Jambi	-	Direct Interview	19 March 2019	✓	
7	Previous Land Owner (13 sampel from 250 persons according to compensation documents)  <i>*only one person that could be interviewed. The others sample can't be met, because they have move out and some have passed away.</i>	Sub District of Sekernan, District of Muaro Jambi	-	Direct Interview	19 March 2019	✓	
8	Local Contactor of FFB Transporter	Sukemen Subdistrict, Muaro Jambi Regency	-	Interview	19 March 2019	✓	
9	Local Contractor of Mechanical and Civil, CV Multi Guna Usaha	Sukemen Subdistrict, Muaro Jambi Regency	-	Interview	19 March 2019	✓	
10	Worker union of PT BBB and IPB3	PT BBB	-	Interview	19 March 2019	✓	
11	Gender Committee of PT BBB	PT BBB	-	Interview	19 March 2019	✓	
12	Supplier FFB	Sukemen Subdistrict, Muaro Jambi Regency	-	Interview	19 March 2019	✓	
13	Employee cooperative of PT BBB	PT BBB	-	Visit and Interview	19 March 2019	✓	
14	BBB Estate - Spraying: 5 pesticide applicator - Manuring: 10 fertilizer loader - Harvesting: 4 workers - Manual weeding: 2 worker - EFB application: 4 worker	Tanjung Kembiri Estate	-	Visit and Interview	20 February 2019	✓	
15	BBB Mill - Security: 2 Security - Loading ramp: 2 workers - Sterillizer station: 1 worker	Tanjung Kembiri Mill	-	Visit and Interview	19 February 2019	✓	

	<ul style="list-style-type: none"> <li>- Press station: 1 worker</li> <li>- Boiler station: 1 worker</li> <li>- Engine room: 1 worker</li> <li>- Kernel station: 1 worker</li> <li>- WWTP: 1 worker</li> <li>- WTP: 1 worker</li> <li>- Workshop: 2 workers</li> <li>- Chemical storage: 1 operator</li> <li>- Hazardous waste storage: 1 worker</li> </ul>						
16	Sawit watch	Bogor, Indonesia	<a href="mailto:info@sawitwatch.or.id">info@sawitwatch.or.id</a>	Email	29 January 2019		✓
17	WWF	Jakarta, Indonesia	<a href="mailto:wwf-indonesia@wwf.or.id">wwf-indonesia@wwf.or.id</a>	Email	29 January 2019		✓
18	WALHI	Jakarta, Indonesia	<a href="mailto:informasi@walhi.or.id">informasi@walhi.or.id</a>	Email	29 January 2019		✓
19	AMAN	Jakarta, Indonesia	<a href="mailto:rumahaman@cbn.net.id">rumahaman@cbn.net.id</a>	Email	29 January 2019		✓

**Appendix 2. Assessment Program**

DATE	18 – 22 March 2019	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 18 March 2019		
05.45 – 07.15	Flight Jakarta – Jambi	All Auditor
07.15 – 10.00	Jambi – SITE (PT. Brahma Binabakti)	
10.00 – 12.00	Opening meeting <ul style="list-style-type: none"><li>Auditee Speech (Introduction of PIC, Profile of Certified Management Unit)</li><li>Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification)</li></ul>	
12.00 – 14.00	Break	
14.00 – 17.00	Documents Review <ul style="list-style-type: none"><li>Review of previous assessment findings</li><li>Verification of Basic Information Mill and Estate</li><li>Confirmation of Time Bound Plan</li><li>Review of Partial Certification</li><li>Verification of P n C documents</li></ul>	
Tuesday, 19 March 2019		
08.00 – 12.00	Public Consultation <ul style="list-style-type: none"><li>Stakeholder consultation to affected communities surrounding the plantations, indigenous peoples, local communities and previous land owners.</li><li>Stakeholders consultation to related agencies in Muaro Jambi Regency</li><li>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)</li></ul>	LEO  BYG HSS/AAS
12.00 – 14.00	Break	
14.00 – 17.00	Field observation to Brahma Binabakti Mill : <ul style="list-style-type: none"><li>Supply Chain verification (FFB Receiving, Weighbridge),</li><li>Implementation of Occupational Health &amp; Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect, security post, FFB Sorting, Processing Activity, Despatch CPO)</li><li>Implementation of Environmental aspect, Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, POME Pond &amp; land application</li></ul>	LEO HSS/AAS  BYG
Wednesday, 20 March 2019		

DATE	18 – 22 March 2019	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
08.00 – 12.00	<b>Field Observation to Bina Bakti Estate</b> Aspect to be verified : <ul style="list-style-type: none"> <li>• Implementation of Legal Aspect (Land Ownership, Legal Boundaries), HCV;</li> <li>• Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health &amp; Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect</li> <li>• 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).</li> </ul>	<b>LEO</b>  <b>HSS/AAS</b>  <b>BYG</b>
12.00 – 14.00	<b>Break</b>	
14.00 – 17.00	<ul style="list-style-type: none"> <li>• Continue Field Observation and field observation clarification</li> <li>• Verification of documents and completing checklist</li> </ul>	<b>All Auditor</b>
<b>Thursday, 21 March 2019</b>		
08.00 – 12.00	<ul style="list-style-type: none"> <li>• Continue Field Observation and field observation clarification</li> <li>• Verification of documents and completing checklist</li> </ul>	
12.00 – 14.00	<b>Break</b>	
14.00 – 16.00	<ul style="list-style-type: none"> <li>• Interim Meeting Auditor</li> </ul>	
16.00 – 17.00	<ul style="list-style-type: none"> <li>• Closing Meeting</li> </ul>	<b>All Auditor</b>
<b>Friday, 22 March 2019</b>		
08.00 – 10.00	<b>(PT. Brahma Binabakti) → Jambi</b>	<b>All Auditor</b>
11.15 – 12.35	<b>Flight Jambi - Jakarta</b>	