

***Roundtable on Sustainable Palm Oil Certification
RSPO***

[✓] Re-Certification

Name of Management : Mandah Palm Oil Mill – PT Bhumireksa Nusasejati subsidiary of Sime Darby Organisation
 Organisation : Plantation, Berhad.
 Plantation Name : Mandah Estate and Rotan Semelur Estate
 Location : Village of Bente, Sub District of Mandah, District of Indragiri Hilir, Province of Riau, Indonesia
 Certificate Code : **MUTU-RSPO/036**
 Date of Initial Registration : 01 April 2014
 Date of Certificate Issue : 26 June 2019 Date of License Issue : 01 Juli 2019
 Date of Certificate Expiry : 31 March 2024 Date of License Expiry : 31 March 2020

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
RC	11 to 14 March 2019	Trismadi Nurbayuto (Lead Auditor), Ardiansyah, Mohamad Amarullah, Brigitta Prita, Haikal Ramadhan Kharismansyah	Ganapathy Ramasamy	Octo H. P. N. Nainggolan

Assessment	Approved by MUTUAGUNG LESTARI on:
RC	26 June 2019

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

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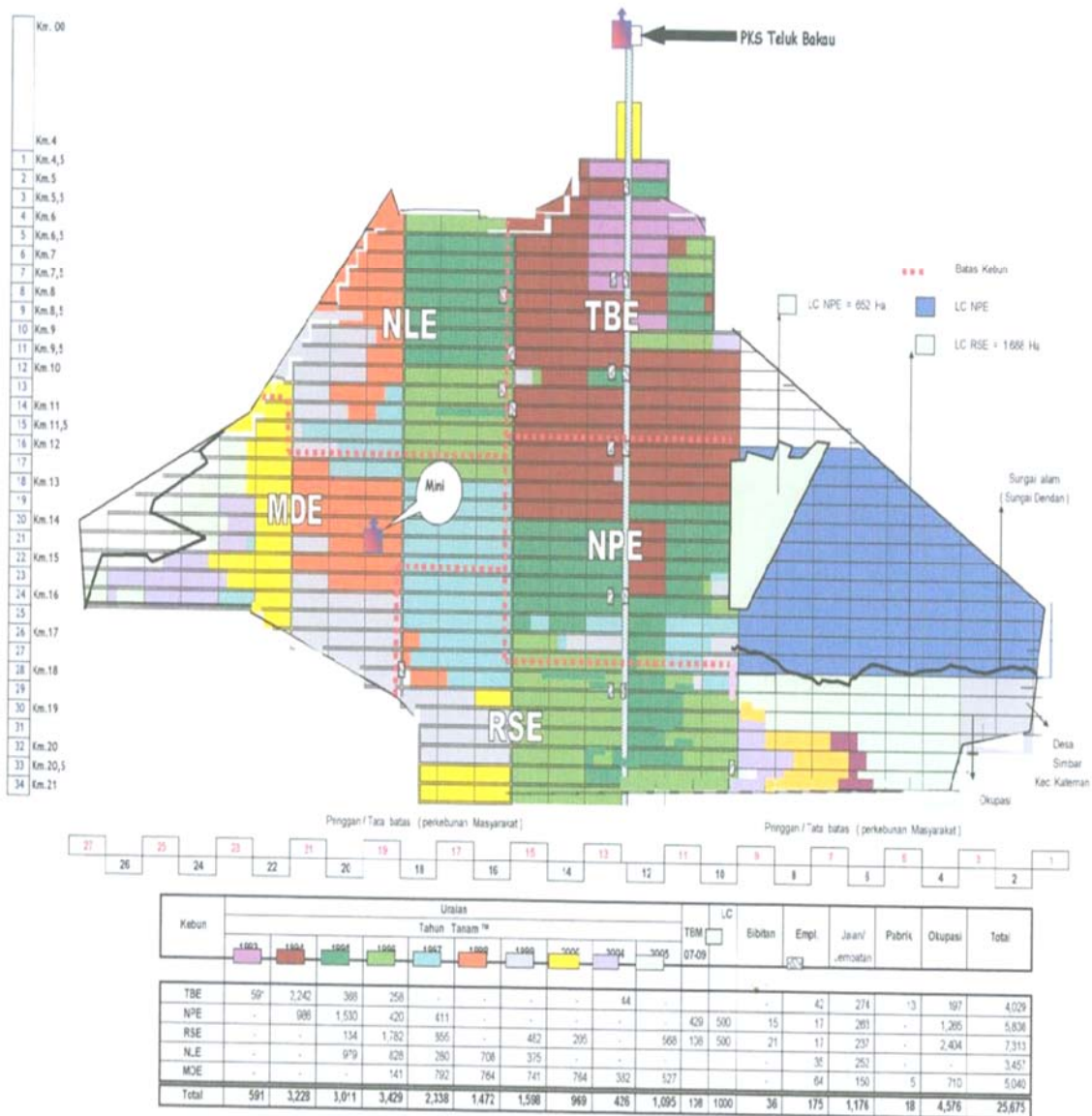
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Figure 1. Location Map of PT Bhumireksa Nusasejati



Figure 2. Operational Map of PT Bhumireksa Nusasejati



Abbreviations Used

AMDAL / SEIA	: Analisis Mengenai Dampak Lingkungan (Social and Environmental Impact Assessment)
BKS-PPS	: Badan Kerjasama – Perusahaan Perkebunan Sumatera
BNS	: Bhumireksa Nusasejati
BOD	: Biological Oxygen Demand
BPJS TK	: Badan Penyelenggara Jaminan Sosial Tenaga Kerja (Social Security Administrator for worker)
BPJS Kesehatan	: Badan Penyelenggara Jaminan Sosial Kesehatan (Social Security Administrator of Health)
BPN	: Badan Pertanahan Nasional (National Land Agency)
CECT	: Closed End Conservation Trench
CH	: Certificate Holder
CSR	: Corporate Social Responsibility
CPO	: Crude Palm Oil
EFB	: Empty Fruit Bunch
ESH	: Environment and Occupational Safety and Health
FFB	: Fresh Fruit Bunches
GM	: General Manager
HCV	: High Conservation Value (Nilai Konservasi Tinggi)
HGU	: Hak Guna Usaha. (Land Use Title)
HIRARC	: Hazard Identification Risk Assessment and Risk Control
HO	: Head Office
IPM	: Integrated Pest Management
ISPO	: Indonesian Sustainable Palm Oil
IUP	: Izin Usaha Perkebunan. (Plantation Business License)
JAMSOSTEK	: Jaminan Sosial Tenaga Kerja (Social Assurance of Labor)
JAMKESMAS	: Jaminan Kesehatan Masyarakat (community health security from government to the underprivileged)
KK	: Kartu Keluarga (letters which describe the Family members)
KTP	: Kartu Tanda Penduduk (Personal Identity Card)
LUCA	: Land Use Change Analysis
MDE	: Mandah Estate
MRC	: Minamas Research Centre
NC	: Non Conformity
NLE	: Nusa Lestari Estate
OER	: Oil Extraction Rate
OHS	: Occupational Health and Safety
P2K3	: Panitia Pembina Keselamatan and Kesehatan Kerja (Occupational Safety and Health Committee)
PK	: Palm Kernel
PKO	: Palm Kernel Oil
POM	: Palm Oil Mill
PPE	: Personal Protection Equipment
PSD	: Plantation Services Departement
PSQM-EHS	: Plantation Sustainability and Quality Management-Environment Health and Safety
RKL/RPL	: Rencana Kelola Lingkungan/ Rencana Pemantauan Lingkungan (Environmental Management and Monitoring Plan)
RSE	: Rotan Semelur Estate
RSPO	: Roundtable on Sustainable Palm Oil
SIA	: Social Impact Assessment
SCCS	: Supply Chain Certification System
SOP	: Standard Operating Procedure
SOU	: Strategic Operation Unit
SPSI	: Serikat Pekerja Seluruh Indonesia (Labor Union)

UKL/UPL	:	<i>Upaya Kelola Lingkungan/ Upaya Pemantauan Lingkungan</i> (Environmental Management and Monitoring Efforts)
WWTP	:	Wastewater Treatment Plant
WTP	:	Water Treatment Plant

1.0	SCOPE of the CERTIFICATION ASSESSMENT						
1.1	Assessment Standard Used <ul style="list-style-type: none"> Indonesian National Interpretation of RSPO Principles and Criteria (P&C) 2013 by INA-NITF July 2016, endorsed by the RSPO Board of Governors on September 30th 2016 RSPO Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014 revised on 14 June 2017 (Module D / E for CPO Mill) RSPO Certification System for Principles and Criteria, 14 June 2017 						
1.2	Organisation Information						
1.2.1	Organization name listed in the certificate	PT Bhumireksa Nusasejati, subsidiary of Sime Darby Plantation Berhad.					
1.2.2	Contact person	Alagendran Maniam					
1.2.3	Organisation address and site address	RSPO registered company: No 2, Plantation Tower, PJU 1A/7Street Petaling Jaya, Malaysia 47301 Liaison Office: The Plaza Office Tower, 36 th Floor Jl. MH Thamrin Kav. 28-30, Jakarta 10350					
1.2.4	Telephone	+62-21-29926000					
1.2.5	Fax	+62-21-29922686					
1.2.6	E-mail	alagendran.maniam@sime-darbyplantation.com					
1.2.7	Web page address	www.sime-darbyplantation.com					
1.2.8	Management Representative who completed the application for certification	Alagendran A.L Maniam (Head of PSQM Minamas Plantation)					
1.2.9	Registered as RSPO member	07 September 2004 (1-0008-04-000-00)					
1.3	Type of Assessment						
1.3.1	Scope of Assessment and Number of Management Unit	Palm Oil Mill and supply base <ul style="list-style-type: none"> Mandah Palm Oil Mill, Mandah Estate and Rotan Semelur Estate 					
1.3.2	Type of certificate	Single					
1.4	Locations of Mill and Plantation						
1.4.1	Location of Mill						
	Name of Mill	Location	Coordinate <table border="1"> <tr> <th>Latitude</th> <th>Longitude</th> </tr> <tr> <td>N 00° 06' 57"</td> <td>E 103° 32' 57"</td> </tr> </table>	Latitude	Longitude	N 00° 06' 57"	E 103° 32' 57"
Latitude	Longitude						
N 00° 06' 57"	E 103° 32' 57"						
	Mandah POM	Bente Village, Mandah Sub District, Indragiri Hilir District, Riau Province, Indonesia					
1.4.2	Location of Certification Scope of Supply Base						
	Name of Supply Base	Location	Coordinate <table border="1"> <tr> <th>Latitude</th> <th>Longitude</th> </tr> <tr> <td>N 00° 08' 07"</td> <td>E 103° 32' 51"</td> </tr> </table>	Latitude	Longitude	N 00° 08' 07"	E 103° 32' 51"
Latitude	Longitude						
N 00° 08' 07"	E 103° 32' 51"						
	Mandah Estate	Rotan Semelur Village, Pelangiran Sub District, Indragiri Hilir District, Riau Province, Indonesia					

	Rotan Semelur Estate	Rotan Semelur Village, Pelangiran Sub District, Indragiri Hilir District, Riau Province, Indonesia	N 00° 07' 04"	E 103° 36' 17"
1.5	Description of Area Statement			
1.5.1	Tenure			
	<ul style="list-style-type: none">State		a. HGU (land title) certificate Number 01 dated 23 May 1996 for 13,900 Ha* b. HGU (land title) certificate Number 02 dated 23 May 1996 for 11,762 Ha* *HGU for all estate under PT BNS	
	<ul style="list-style-type: none">Community			
1.5.2	Area Statement			
			Total	
	<ul style="list-style-type: none">Total area		12,366.18	Ha
	<ul style="list-style-type: none">Mature area		6,956.00	Ha
	<ul style="list-style-type: none">Immature area		1,283.00	Ha
	<ul style="list-style-type: none">Mill		14.00	Ha
	<ul style="list-style-type: none">Emplacement		115.18	Ha
	<ul style="list-style-type: none">Infrastructure (Canal & trenches)		384.00	Ha
	<ul style="list-style-type: none">Occupation		2,908.08	Ha
	<ul style="list-style-type: none">HCV		705.92	Ha
1.6	Planting Year and Cycles			
1.6.1	Age profile of planting year			
	Planting Year	Hectarage (Ha)		
		Mandah Estate	Rotan Semelur Estate	Total
	1996	-	658.00	658.00
	1997	291.00	846.00	1,137.00
	1998	810.00	-	810.00
	1999	645.00	482.00	1,127.00
	2000	642.00	205.00	847.00
	2004	521.00	-	521.00
	2005	510.00	568.00	1,078.00
	2007	-	108.00	108.00
	2014	-	390.00	390.00
	2015	141.00	139.00	280.00
	Total Mature	3,560.00	3,396.00	6,956.00
	2015	135.00	165.00	300.00
	2016	-	283.00	283.00
	2017	274.00	284.00	558.00

	2018	142.00	-	142.00																													
	Total Immature	551.00	732.00	1,283.00																													
	Total	4,111.00	4,128.00	8,239.00																													
1.6.2	New Planting area after January 2010	- Ha																															
1.6.3	Planting Cycle	2 nd Cycle																															
1.7	Description of Mill and Supply Base																																
1.7.1	Description of Mill																																
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	<table><tr><th colspan="2">CPO</th><th colspan="2">Palm Kernel</th></tr><tr><th>Out put (tonnes)</th><th>Extraction (%)</th><th>Out put (tonnes)</th><th>Extraction (%)</th></tr><tr><td>Mandah</td><td>45</td><td>97,121.78</td><td>21,429.37</td><td>22.06</td><td>5,056.68</td><td>5.21</td></tr></table>	CPO		Palm Kernel		Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)	Mandah	45	97,121.78	21,429.37	22.06	5,056.68	5.21														
CPO		Palm Kernel																															
Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)																														
Mandah	45	97,121.78	21,429.37	22.06	5,056.68	5.21																											
	<i>*Production data source from March 2018 to February 2019</i>																																
1.7.2	Description of Certification Scope of Supply Base																																
	Name of Estate	Total Area (Ha)	Planted Area (Ha)	<table><tr><th>FFB (tonnes/year)</th><th>Yield (tonnes/ha/year)</th><th colspan="2">Supplied to Mill</th></tr><tr><th></th><th></th><th>FFB (tonnes/year)</th><th>%</th></tr><tr><td>Mandah Estate</td><td>5,053.18</td><td>4,111.00</td><td>57,683.61</td><td>16.20</td><td>57,683.61</td><td>100</td></tr><tr><td>Rotan Semelur Estate</td><td>7,313.00</td><td>4,128.00</td><td>38,126.09</td><td>11.23</td><td>38,126.09</td><td>100</td></tr><tr><td>TOTAL</td><td>12,366.18</td><td>8,239.00</td><td>95,809.70</td><td>9.82</td><td>95,809.70</td><td>100</td></tr></table>	FFB (tonnes/year)	Yield (tonnes/ha/year)	Supplied to Mill				FFB (tonnes/year)	%	Mandah Estate	5,053.18	4,111.00	57,683.61	16.20	57,683.61	100	Rotan Semelur Estate	7,313.00	4,128.00	38,126.09	11.23	38,126.09	100	TOTAL	12,366.18	8,239.00	95,809.70	9.82	95,809.70	100
FFB (tonnes/year)	Yield (tonnes/ha/year)	Supplied to Mill																															
		FFB (tonnes/year)	%																														
Mandah Estate	5,053.18	4,111.00	57,683.61	16.20	57,683.61	100																											
Rotan Semelur Estate	7,313.00	4,128.00	38,126.09	11.23	38,126.09	100																											
TOTAL	12,366.18	8,239.00	95,809.70	9.82	95,809.70	100																											
	<i>*Production data source from March 2018 to 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	<table><tr><th>Production Area (Ha)</th><th>Supplied to Mill FFB (tonnes/year)</th></tr><tr><td>Nusa Perkasa Estate (RSPO Certified)</td><td>PT BNS</td><td>-</td><td>3,769.04</td><td>1,312.07</td></tr><tr><td colspan="4">TOTAL</td><td>1,312.07</td></tr></table>	Production Area (Ha)	Supplied to Mill FFB (tonnes/year)	Nusa Perkasa Estate (RSPO Certified)	PT BNS	-	3,769.04	1,312.07	TOTAL				1,312.07																	
Production Area (Ha)	Supplied to Mill FFB (tonnes/year)																																
Nusa Perkasa Estate (RSPO Certified)	PT BNS	-	3,769.04	1,312.07																													
TOTAL				1,312.07																													
	<i>*Source Production Data on March 2018 to 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		101,195	97,121.78																													
	• CPO Production		23,275	21,429.37																													
	• Palm Kernel (PK) Production		5,060	5,056.68																													
	<i>*Ext Volume on 20 March 2019</i>																																
1.8.2	Product selling																																
	Tonnage of selling product		Last Year Period of Actual Selling Product (MT)																														
	• CSPO sold as RSPO certified product		9,008.93																														
	• CSPK sold as RSPO certified product		617.33																														
	• CSPO sold under other scheme		0																														

	• CSPK sold under other scheme		0					
	• CSPO sold as conventional		9,812.52					
	• CSPK sold as conventional		3,366.56					
Data on March 2018 until February 2019 or last year period of actual selling product (MT).								
1.8.3	Estimate of Certified FFB Claim							
	Name of Estates	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)			
	Mandah Estate	5,053.18	4,111.00	60,568	17,01			
	Rotan Semelur Estate	7,313.00	4,128.00	40,032	11.79			
	TOTAL	12,366.18	8,239.00	100,600	14.46			
*Projected FFB production for 12 months of certificate (01 April 2019 to 31 March 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 (%)	
	Mandah	45	100,600	23,138	23.00	5,231	5.20	IP
*Projected CSPO and CSPK production for 12 months of certificate (01 April 2019 to 31 March 2020).								
1.9	Other Certifications							
	ISO 9001:2008		-					
	ISO 14001: 2004		-					
	OHSAS 18001:2007		-					
	ISCC		-					
	Others		ISPO: MUTU-ISPO/078 dated 5 April 2017 to 4 April 2022					
1.10	Time Bound Plan							
1.10.1	Time Bound Plan for Other Management Units							
	Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status		
	Mill	Time bound						
	INDONESIA							
1	Sekunzir. PT. Indotruba Tengah	2010	Sekunzir	2010	Seruyan and West Kotawaringin District – Central Kalimantan	Certified		
			Seruyan	2010		Certified		
2	Manggala. PT. Tunggal Mitra Plantations	2010	Manggala 1	2010	Rokan Hilir District – Riau	Certified		
			Manggala 2	2010		Certified		
			Manggala 3	2010		Certified		
3	Bukit Ajong PT. Sime Indo Agro	2010	West	2010	Sanggau District –West Kalimantan	Certified		
			West (HGU on process)	2019		-		
			East	2010		Certified		
			East (HGU on process)	2019		-		

			East Plasma	2010		Certified
			West Plasma	2010		Certified
			Sei Mawang	2019		-
4	Teluk Siak. PT Aneka Inti Persada	2011	Teluk Siak	2011	Siak District – Riau	Certified
			Pinang Sebatang	2011		Certified
			Aneka Persada	2011		Certified
5	Sungai Pinang. PT. Bina Sains Cemerlang	2012	Sungai Pinang	2012	Musi Rawas District – South Sumatera	Certified
			Sungai Pinang (HGU on process)	2020		-
			Bukit Pinang	2012		Certified
			Bukit Pinang (HGU on process)	2020		-
6	Pematang. PT. Teguh Sempurna	2011	Pematang	2011	Seruyan and East Kotawaringin District – Central Kalimantan	Certified
			Kawan Batu	2011		Certified
			Hatan Tiring	2011		Certified
			Batang Garing	2011		Certified
7	Alur Dumai. PT Lahan Tani Sakti	2011	Alur Dumai	2011	Rokan Hilir District – Riau	Certified
8	Teluk Bakau. PT. Bhumireksa Nusa Sejati	2011	Teluk Bakau	2011	Indra Giri Hilir District – Riau	Certified
			Nusa Perkasa	2011		Certified
			Nusa Lestari	2011		Certified
9	Mandah PT. Bhumireksa Nusa Sejati	2014	Mandah	2011	Indra Giri Hilir District – Riau	Certified
			Rotan Semelur	2011		Certified
10	Angsana. PT Ladangrumpun Suburabadi	2011	Angsana	2011	Tanah Bumbu District – South Kalimantan	Certified
			Gunung Sari	2011		Certified
			Pantai Bonati	2011		Certified
			KKPA-1 PT.SHE	2013		Certified
			KKPA-4 PT.SHE	2013		Certified
11	Mustika. PT Sajang Heulang	2013	Mustika	2013	Tanah Bumbu District – South Kalimantan	Certified
			KKPA-2 PT.SHE	2013		Certified
			KKPA-3 PT.SHE	2013		Certified
			KKPA-5 PT.SHE	2013		Certified
			SAP 1	2020		-
12	Gunung Aru. PT Bersama Sejahtera Sakti	2011	Gunung Aru	2011	Kotabaru District – South Kalimantan	Certified
			Gunung Kemas	2011		Certified
			Laut Timur	2011		Certified
			Pantai Timur	2011		Certified
			KKPA BSS	2020		-
13	Bebunga. PT. Langgeng	2011	Bebunga	2011	Kotabaru District – South Kalimantan	Certified
			Bakau	2011		Certified

	Muaramakmur		Sungai Cengal	2011		Certified
14	Sukamandang PT Kridatama Lancar	2011	Sukamandang	2011	Seruyan and East Kotawaringin District – Central Kalimantan	Certified
			Sapiri	2011		Certified
			Barasdanum	2011		Certified
			Kuala Kuayan	2011		Certified
15	Pondok Labu. PT Paripurna Swakarsa	2012	Binturung	2012	Kotabaru District – South Kalimantan	Certified
			Pondok Labu	2012		Certified
			Rampa	2012		Certified
			Sesulung	2012		Certified
16	Rantau. PT Laguna Mandiri	2012	Rantau	2012	Kotabaru District – South Kalimantan	Certified
			Matalok	2012		Certified
			KKPA Sungai Cengal (1,382 SH)	2014		Certified
			Selabak (PT SAA)	2012		Certified
			Randi (PT SAA)	2012		Certified
			Sangkoh (PT SAA)	2012		Certified
			Lanting (PT LMR)	2012		Certified
17	Betung. PT Laguna Mandiri	2014	Betung	2012	Kotabaru District – South Kalimantan	Certified
			Sekayu	2012		Certified
18	Ungkaya. PT Tamaco Graha Krida	2012	Ungkaya	2012	Morowali District – Sulawesi Tengah	Certified
			Plasma TGK	2020		-
19	Ladang Panjang. PT Bahari Gembira Ria	2012	Ladang Panjang	2012	Muaro Jambi District - Jambi	Certified
			Ladang Panjang (HGU on process)	2020		-
			Plasma BGR	2020		-
20	Rantau Panjang. PT Guthrie Pecconina Indonesia	2012	Rantau Panjang	2012	Musi Banyuasin District – South Sumatera	Certified
			Rantau Panjang (HGU on process)	2020		-
			Bumi Ayu	2012		Certified
			Karang Ringin	2012		Certified
			Napal	2012		Certified
			Napal (HGU on process)	2020		-
			Mangun Jaya	2012		Certified
			Mangun Jaya (HGU on process)	2020		-
			Sungai Jernih	2020		-
			GPI KKPA	2020		-
21	Blang Simpo. PT Perkasa Subur Sakti	2013	Tamiang (PT PPP)	2013	Aceh Tamiang and East Aceh District – Aceh	Certified
			Batang Ara (PT PSK)	2013		Certified
			Blang Simpo-01	2013		Certified
			Blang Simpo-02	2013		Certified

22	MAS. PT Mitra Austral Sejahtera	2020	MAS 1	2019	Sanggau District – West Kalimantan	-
			MAS 1	2019		-
			MAS 1	2019		-
			Plasma MAS	2020		-
23	Lembiru. PT Sandika Nata Palma	2014	Lembiru	2014	Ketapang District – West Kalimantan	Certified
			Awatan	2014		Certified
			Karya Palma	2019		-
			KKPA SNP	2020		-
			Pelanjau (PT BAL)	2019		IC
			Sungai Putih (PT BAL)	2019		-
			Baturus (PT BAL)	2019		-
			KKPA BAL	2020		-
MALAYSIA						
1	Sg Dingin SOU 1	2010	Bukit Hijau	2010	Kerangan, Kedah	Certified
			Padang Buluh	2010		Certified
			Bukit Selangor	2010		Certified
			Sg Dingin	2010		Certified
			Jentayu	2010		Certified
			Anak Kuli	2010		Certified
			Somme	2010		Certified
2	Chersonese SOU 2	2011	Chersonese	2011	Kuala Kurau, Perak	Certified
			Holyrood	2011		Certified
			Kalumpang	2011		Certified
			Tali Ayer	2011		Certified
3	Elphil SOU 3	2011	Kinta Kellas	2011	Sg Siput, Perak	Certified
			Elphil	2011		Certified
			Kamuning	2011		Certified
4	Flemington SOU 4	2011	Flemington	2011	Teluk Intan, Perak	Certified
			Bagan Datoh	2011		Certified
			Sabak Bernam	2011		Certified
			Sg Samak	2011		Certified
5	Seri Intan SOU 5	2011	Seri Intan (Main Division)	2011	Teluk Intan, Perak	Certified
			Sabrang	2011		Certified
			Sg Wangi	2011		Certified
			Sogomana (Main Division)	2011		Certified
6	Selaba SOU 5	2011	Seri Intan (Selaba Division)	2011	Teluk Intan, Perak	Certified
			Sogomana (Cashwood & Sg Beruas Division)	2011		Certified

			Bikam	2011		Certified
			Clumy	2011		Certified
7	Tennamaram SOU 6	2011	Tennamaram	2011	Bestari Jaya, Selangor	Certified
			Sungei Buloh	2011		Certified
			Bkt Talang	2011		Certified
8	Bkt Kerayong SOU 7	2011	Bkt Kerayong	2011	Kapar, Selangor	Certified
			Bkt Cherakah	2011		Certified
			Bkt Rajah	2011		Certified
			Bkt Lagong	2011		Certified
			Elmina	2011		Certified
9	East SOU 8	2010	East	2010	Carey Island, Selangor	Certified
			Dusun Durian	2010		Certified
			Sepang	2010		Certified
10	West - SOU 9	2010	West	2010	Carey Island, Selangor	Certified
11	Bukit Putri - SOU 10	2011	Bukit Putri	2011	Raub, Pahang	Certified
12	Kerdau SOU 11	2011	Kerdau	2011	Temerloh, Pahang	Certified
			Jentar	2011		Certified
			Mentakab	2011		Certified
			Sg Mai	2011		Certified
			Chenor	2011		Certified
13	Jabor - SOU 12	2011	Jabor	2011	Kuantan, Pahang	Certified
14	Labu SOU 13	2011	Labu	2011	Nilai, Negeri Sembilan	Certified
			New Labu	2011		Certified
			Bradwall	2011		Certified
15	Tanah Merah SOU 14	2010	Tanah Merah	2010	Port Dickson, Negeri Sembilan	Certified
			Sua Betong	2010		Certified
			Bukit Pelandok	2010		Certified
16	Sua Betong SOU 15	2014	Salak	2014	Port Dickson, Negeri Sembilan	Certified
			Sengkang	2014		Certified
			Siliau	2014		Certified
			PD Lukut	2014		Certified
			Sungai Baru	2014		Certified
			Tampin Linggi	2014		Certified
17	Kok Foh SOU 16	2011	Bukit Pilah	2011	Bahau, Negeri Sembilan	Certified
			Kok Foh	2011		Certified
			Muar River	2011		Certified
			St. Helier	2011		Certified
			Pertang	2011		Certified

			Sg Gemas	2011		Certified
			Sg Sebalang	2011		Certified
			Sg Senarut	2011		Certified
18	Kempas SOU 17	2010	Kempas	2010	Jasin, Melaka	Certified
			Kemuning	2010		Certified
			Tangkah	2010		Certified
19	Diamond Jubilee SOU 18	2011	Bukit Asahan	2011	Jasin, Melaka	Certified
			Diamond Jubilee	2011		Certified
			Serkam	2011		Certified
20	Pagoh SOU 19	2014	Pagoh	2014	Muar, Johor	Certified
			Lanadron	2014		Certified
			Pengkalan Bukit	2014		Certified
			Welch	2014		Certified
21	Chaah SOU 20	2010	North Labis	2010	Chaah, Johor	Certified
			Cha'ah	2010		Certified
			Sg Simpang Kiri	2010		Certified
22	Gunung Mas SOU 21	2010	Gunung Mas	2010	Kluang, Johor	Certified
			Kempas Klebang	2010		Certified
			Bukit Paloh	2010		Certified
			Yong Peng	2010		Certified
23	Bukit Benut SOU 22	2011	Bukit Benut	2011	Kluang, Johor	Certified
			CEP Niyor	2011		Certified
			Lambak / Elaeis	2011		Certified
24	Ulu Remis SOU 23	2011	Pekan	2011	Layang-layang, Johor	Certified
			Sembrong	2011		Certified
			Tun Dr. Ismail	2011		Certified
			Ulu Remis	2011		Certified
			Bukit Badak	2011		Certified
			Cenas	2011		Certified
25	Hadapan SOU 24	2011	CEP Rengam	2011	Layang-layang, Johor	Certified
			Kulai	2011		Certified
			Layang	2011		Certified
			Seri Pulai	2011		Certified
26	Sandakan Bay SOU 26	2008	Tun Tan Siew Sin	2008	Sandakan, Sabah	Certified
			Tunku	2008		Certified
			Tigowis	2008		Certified
			Sentosa	2008		Certified
			Saguliud	2008		Certified

27	Melalap SOU 27	2011	Melalap	2011	Tenom, Sabah	Certified
			Sapong	2011		Certified
28	Binuang SOU 28	2009	Tingkayu	2009	Kunak, Sabah	Certified
			Sungang	2009		Certified
			Jelata Bumi	2009		Certified
			Binuang	2009		Certified
29	Giram SOU 29	2009	Mostyn	2009	Kunak, Sabah	Certified
Giram			2009	Certified		
30	Merotai SOU 30	2009	Imam	2009	Tawau, Sabah	Certified
			Merotai	2009		Certified
			Table	2009		Certified
			Tiger	2009		Certified
31	Lavang SOU 31	2011	Belian	2011	Bintulu, Serawak	Certified
			Kelida	2011		Certified
			Lavang	2011		Certified
			Lavang (SE)	2011		Certified
			Rasan	2011		Certified
			Chartquest	2011		Certified
			Dulang	2011		Certified
			Peroh	2011		Certified
			Pekaka	2011		Certified
			Ruai	2011		Certified
32	Rajawali SOU 32	2011	Rajawali	2011	Bintulu, Serawak	Certified
			Samudera	2011		Certified
			Semarak	2011		Certified
			Bayu	2011		Certified
33	Derawan SOU 33	2011	Takau	2011	Bintulu, Serawak	Certified
			Damai	2011		Certified
			Derawan	2011		Certified
			Sahua	2011		Certified
	LIBERIA					
1	Grand Cape Mount	2018	Matambo	2018	Grand Cape Mount, Liberia	IC
			Grand Cape Mount	2018		IC
			Zodua	2018		IC
			Bomi	2018	Bomi, Liberia	IC
			Lofa	2018		IC
	P & G (New Britain Palm Oil)					
1	Poliamba	2012	Kara	2012	Kevieng, New Ireland Province,	Certified

			West Coast	2012	P&G	Certified
			Nalik	2012		Certified
			Noatsi	2012		Certified
			Madak	2012		Certified
			North (Smallholders)	2012		Certified
			South (Smallholders)	2012		Certified
			West (Smallholders)	2012		Certified
2	Tetere	2011	Tetere	2011	Gudaicanal, Slomon Island	Certified
			Ngalimbiu	2011		Certified
			Mbalisuna	2011		Certified
			West Zone (Smallholders)	2011		Certified
			Central Zone (Smallholders)	2011		Certified
			MBA East (Smallholders)	2011		Certified
			MBA West (Smallholders)	2011		Certified
3	Sangara, Sambiripa & Mamba	2013	Sangara	2013	Higaturu, Popondetta, Oro, P&G	Certified
			Sumberipa	2013		Certified
			Ambogo	2013		Certified
			Embi	2013		Certified
			Mamba	2013		Certified
			Sorovi (smallholders)	2013		Certified
			Igora (smallholders)	2013		Certified
			Saiho (smallholders)	2013		Certified
			Aeka (smallholders)	2013		Certified
			Ilimo (smallholders)	2013		Certified
4	Gusap	2010	Dumpu	2010	Madang, P&G	Certified
			Surinam	2010		Certified
			Jephcott	2010		Certified
			Gusap	2010		Certified
			Paddox	2010		Certified
			Ngaru	2010		Certified
			Madang VOP (smallholders)	2010		Certified
			Morobe VOP (smallholders)	2010		Certified
5	Hagita	2013	Giligili	2013	Milne Bay, P&G	Certified
			Hagita	2013		Certified
			Waigani	2013		Certified
			Sagarai	2013		Certified
			Padipadi	2013		Certified

			Mariawatte	2013		Certified
			East Gurney	2013		Certified
			West Gurney	2013		Certified
			East Sagarai	2013		Certified
			West Sagarai	2013		Certified
6	Mosa Kumbango Kapiura Namumdo Waraston	2008	Bebere	2008	West New Britain	Certified
			Kumbango	2008		Certified
			Togulo	2008		Certified
			Dami	2008		Certified
			Waisisi	2008		Certified
			Kautu	2008		Certified
			Karaus	2008		Certified
			Moroa	2008		Certified
			Bilomi	2008		Certified
			Loata	2008		Certified
			Haella	2008		Certified
			Garu	2008		Certified
			Daliavu	2008		Certified
			Sapuri	2008		Certified
			Malilimi	2008		Certified
			Rigula	2008		Certified
			Nomundo	2008		Certified
			Navarai / Karato ME	2008		Certified
			Volupai . Lotomgam / Natupi / Goruru	2008		Certified
			Lolokoru	2008		Certified
			Silovoti	2008		Certified
			LSS Hoskin (1,877 Smallholders)	2008		Certified
			VOP East (1,815 Smallholders)	2008		Certified
			VOP Central (1,958 Smallholders)	2008		Certified
			VOP West (1,277 Smallholders)Kaulong / Akamie / Pusiki / Repamira / Sakapei / KDC ME (21 large smallholders)	2008		Certified
			LSS Kapiura (847 Smallholders)	2008		Certified
			VOP Kapiura (551 Smallholders)	2008		Certified
	Sime Darby has achieved 34 management units in Malaysia, 25 mmanagement units in Indonesia, 10 management units in					

	<p>P&G that RSPO certified. Total management unit in Sime Darby Plantation Berhad are 34 in Malaysia, 25 in Indonesia and 10 in P&G. In the year of 2016 & 2017 there are three Mill that are no longer operating, and for the supplying base (Estate) is diverted to a mill that is still operating and has been certified RSPO. The mills are:</p> <ol style="list-style-type: none"> 1. Angsana Mini Mill, PT Sajang Heulang: Mill stop operate since 2016 and the supply bases is transfer to Angsana POM, PT Ladangrumpun Subur Abadi. 2. Selabak Mill, PT Swadaya Andhika: Mill stop operate since 2017 and the supply bases is transfer to Rantau POM, PT Laguna Mandiri 3. Pekaka, SOU 34: Mill stop operate since 2017 and the supply bases is transfer to Lavang, SOU 31 <p>There was change of the Time Bound Plan under Sime Darby on April 2019 cause the Sime Darby postpone the others certification process. Change of the Time Bound Plan explanation: PT Mitra Austral Sejahtera. There are social issue still unresolved from the <i>Serikat Petani Kelapa Sawit</i> (SPKS) Sanggau, however the improvement are in progress. Sime Darby has informed the Time Bound Plan progress, MUTU has consider that Sime Darby still comply with the RSPO requirement for partial certification.</p>
1.10.2	<p>Progress of Associated Smallholders and Out growers for Certifiable Standard.</p> <p><i>The Certificate Holder did not have associated with Independent Smallholder & Out Growers.</i></p>

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
RC	<p>1. Trismadi Nurbayuto (Lead Auditor). Indonesian Citizen. Diploma of Forest Management from Forestry Faculty; Associate Degree of Economic from Economic and Management. He has experienced as field assistant on oil palm plantation year of 2008. Therefore he has experienced as HCV and SEIA Assessor on 2010-2013. He has been followed HCV identification and management training; ISO training (9001;14001; 22000); ISPO Lead Auditor's training; Safety Expert; RSPO Lead Auditor's; OHS Auditors by Government Regulation No 50 year of 2012; and RSPO Next. He has been conducted audit on ISPO and RSPO scheme since year of 2013 as an Auditor on several aspect as environment, OHS, Legality, Best Management Practices, Social, Worker Welfare, Conflict Resolutions, Long term Business Plan and Supply Chain on Palm Oil Mill. During this assesment verified Legal,Social, Partial Certification,and HCV.</p> <p>2. Ardiansyah (Lead Auditor Witnessing). Indonesian citizen, Bachelor of Forest Resources Conservation, Department of Forestry. Had work experience in Environmental NGO for 6 month (2007) and consultant for making EIA Document and KLHS for 3 years (2009 – 2012). Had attend training such as RSPO Lead Auditor course, Lead Auditor ISPO, OHSAS (SIO 18001 – 2007), land cover crop mapping and Management System Certification (ISO 9001-2008), Environmental Management System Certification (ISO 14001-2004), Social Auditing and Conflict Resolution. Had many times following audit activities related to sustainable palm oil certification system which is ISPO as an auditor since 2012 for legal, environmental aspect, conservation and social. Fluent in Bahasa and Malay. At the time of audit he conduct witness to lead auditor.</p> <p>3. Mohamad Amarullah. Indonesian Citizen. Master of Wood Science and Technology and Bachelor of Forestry, majoring in Forest Product Technology. Has experiences as an Agronomist and Research Assistant in Indonesia and Malaysia from 2008 to 2014. Has been attended several trainings such as Lead Auditor of ISPO, RSPO, ISO 17021, ISO 17065, ISO 9001, ISO 19001, ISO 14001, HCV, etc. Has been conducted several ISPO audit scheme as an Auditor since 2014 in BMP, environment, conservation and OHS aspect. Fluent in Bahasa, Malay and English. During this assesment verified OHS & Worker Welfare aspect.</p> <p>4. Brigitta Pritta. Citizen of Indonesia. Bachelor of Forestry, Department of Forest Resources Conservation and Ecotourism. She had attended Training ISPO by Commission ISPO on June 2013, Training ISO 9001:2008 Quality Management System on January 2014, In House Training 17021 and 17065 management system and Product Quality, Training High Conservation Value by IPB on September 2015, In House Training HCV on August 2016, In House Training Roundtable Sustainable Palm Oil on January 2014; In House Training ISO 14000:2004 Environmental Management System. She has been audit experience ISPO & RSPO since April 2013 in the environmental, conservation, waste management and worker welfare aspects.During this assment verified environment, GHG aspect, & SCCS aspect.</p> <p>5. Haikal Ramadhan Kharismansyah. Indonesian citizen, Bachelor of Agriculture department of plant and pest disease (Agrotechnology). He has 3 years experience as an Agronomy Staff in private oil palm plantation in Indonesia. Training which had attended including Basic Management Development Program Agronomy, Integrated Urban Pest Management, Integrated Pest Management, ISO 9001 : 2015, Auditor ISPO, RSPO awareness, ISO 22000 awareness. Did some audit ISPO scheme with aspects Best management practices. During this assesment verified Transparancies, Long Term Business Plan & BMP under Lead Auditor supervision.</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
RC	<p>Number of auditors: 4 auditors</p> <p>Number of days for RC at site: 4 days</p> <p>Number of working days for RC at site: 16 working days</p>
2.2.2	Assessment Process
RC	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Bhumireksa Nusasejati to the requirements of Indonesian National Interpretation of RSPO Principles and Criteria, July 2013 (endorsed by the RSPO Board of Governors meeting on 30th September 2016) and RSPO Supply Chain Certification Standard for Organizations Seeking or Holding Certification Adopted by The RSPO Board or Governors</p>

	<p>on November 21st 2014 Revised on 14 June 2017 (Module D / E for CPO Mill)</p> <p>The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) interview, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site.</p> <p>Opportunity for improvement of the results Re-certification delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment. Improvement of findings from ASA-4 findings were observed by auditors at this assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of Re-Certification.</p>
2.2.3	Locations of Assessment
RC	<p>Mandah Estate</p> <ul style="list-style-type: none"> • Division 4 Block I026. Observation to legal boundary (BPN) Pole No. BNS 84 where situated on occupation area in Dusun Meranti, Village of Bente. Occupation area is mainly planted by Coconut. Coordinate marked: E 103° 28' 40.6" and N 0° 5' 36.0" (App. Avenza Map). • Division 5 Block H016. Observation to legal boundary (BPN) Pole No. BNS 95 where located in adjacent with Dusun Pelangeran Kecil, Village of Pelangeran, which planted by Coconut and <i>Senyampang</i>. Coordinate marked: E 103° 30' 12.2" and N 0° 8' 39.5" (App. Avenza Map). • Division 5 Block H017. Observation to workers camping on the field. • Block G027 Division 3. Circle and Path Spraying. Observation and Interview related handling on pesticide, safety work, OHS, and PPE; • Block G021 Division 2. Manuring. Observation and interview related implementation of SOP, safety work, and handling on fertilizer • Block H16 Division 5. Harvesting. Observation and interviews with workers regarding harvest procedures, wages, and company policies • Block H021 Division 2. Peat Management. Observation on water level <p>Rotan Semelur Estate</p> <ul style="list-style-type: none"> • Division 4 Block F029. Observation and interview with Foreman, 3 Harvester (1 temporary worker) and 1 Loosefruit Picker about their understanding towards technical, manpower rights, safety, health, conservation and environment aspects, as well as facilities provided by PT BNS. Furthermore, there is also observation on barn owl box. • Block D33 Division I. Circle and Path Spraying. Observation and Interview related handling on pesticide, safety work, OHS, and PPE; • Block D34 Division I. Manuring. Observation and interview related implementation of SOP, safety work, and handling on fertilizer • Block E34 Division II. Harvesting. Observation and interviews with workers regarding harvest procedures, wages, and company policies • Block E31 Division II. Manual Circle Maintenance. Observation related implementation of SOP, OHS, PPE, and worker facilities • Block E31 Division II. Nest Box and Beneficial Plant. Observation regarding IPM implementation • Block D30 Division I. Subsidence Pole. Observation on peat management • Chemical store. Field observation and interview related management of chemical. • Fertilizer store. Field observation and interview related management of fertilizer. • First aid Post. Field observation related management of medical waste and others. • Lubricants store. Field observation and interview related management of lubricants. • Fuel store. Field observation and interview related management of fuel. • Fuel tank. Field observation and interview related management of fuel. • Hazardous waste storage. Field observation related management of schedule waste. • Block Spraying System house. Field observation and interview related management of chemical • Material store. Field observation and interview related stock of PPE. • Fire fighters. Field observation related firefighters.

	<ul style="list-style-type: none"> • Generator house. Field observation related management of generator. • HCV Area in Block 29/30, Division 5. There are set-aside HCV area which occupied by the local communities. • Boundary pole BRS 57, 60, 61 in Block E035, Division 2. Observation of availability and maintenance of boundary poles. <p>Mandah Factory</p> <ul style="list-style-type: none"> • Emplasment. Observations regarding the feasibility of housing facilities, infrastructure and domestic waste management. • Post Security. Observation and interview with security officer regarding to FFB receiving procedure, emergency response, payments and complain mechanism. • Weighbridges. Observation and interview with weight bridges operator regarding to supply chain procedure, FFB supplier code, separation of certified and noncertified product, including it calculation. • Laboratory. Observation and interview with 2 analyst, emergency response facility, MSDS and PPE's. • Station of FFB Sortation. Observation and interview with 1 FFB Grader and 2 FFB Transporter about their understanding towards technical, manpower rights, safety, health and environment aspects, as well as facilities provided by PT BNS. • Station of Sterilizer. Observation and interview with 2 Operator and 1 Security Officer about their understanding towards technical, manpower rights, safety, health and environment aspects, as well as facilities provided by PT BNS. • Station of Clarification. Observation and interview with 1 Operator about his understanding towards technical, manpower rights, safety, health and environment aspects, as well as facilities provided by PT BNS. • Station of Press. Observation and interview with 1 Operator about his understanding towards technical, manpower rights, safety, health and environment aspects, as well as facilities provided by PT BNS. • Station of Nut and Kernel. Observation and interview with 1 Operator about his understanding towards technical, manpower rights, safety, health and environment aspects, as well as facilities provided by PT BNS. • Station of Boiler. Observation and interview with 1 Operator with License (SIO) Class 1 and 1 Helper about their understanding towards technical, manpower rights, safety, health and environment aspects, as well as facilities provided by PT BNS. • Station of Engine Room. Observation and interview with 1 Operator about his understanding towards technical, manpower rights, safety, health and environment aspects, as well as facilities provided by PT BNS. • Fire Fighter Pump and Hydrant Simulation. Observation on devices readiness and emergency team. <p>Surrounding Village</p> <ul style="list-style-type: none"> • Parit Gurah Baru Neighbourhood, Teluk Bunian Village. Interview with hamlet and previous land owners.
2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
RC	<p>Consultation of stakeholders for PT Bhumireksa Nusasejati was held by :</p> <ol style="list-style-type: none"> 1. Public announcement on the MUTU website (www.mutucertification.com) at January 25th , 2019. 2. Stakeholder consultations with NGOs have been conducted by sending questionnaires via email to several NGOs (Non Government Organization) on March 5th , 2019. 3. Public consultation meeting with internal stakeholders (worker union, committee gender and local communities) by interviews at March 12th , 2019. 4. Stakeholder consultations with local community have been conducted on February March 12th , 2019. 5. Stakeholder consultations with government have been conducted by phone call to several governments in Indragiri Hilir District on February March 12th , 2019. <p>Numbers of input from stakeholders were clarified by PT Bhumireksa Nusasejati.</p>
2.3.2	Stakeholder contacted
	<i>Please find appendix 1</i>
2.4	Determining Next Assessment
RC	The next visit (ASA-1.1) will be determined eight till one year after Certificate Issued.

3.0. ASSESSMENT FINDINGS

3.1. Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Mandah POM – PT Bhumireksa Nusasejati, Sime Darby Plantation Berhad operation consisting of one (1) mill and two (2) oil palm estates.

During the assessment, there were seven (7) were assigned against Major Compliance Indicators, three (3) nonconformities were assigned against Minor Compliance Indicators, 3 nonconformances against supply chain requirement for CPO mill and three (3) opportunities for improvement were identified.

Further explanation of the non-conformities raised and corrective actions taken by Certificate Holder are provided in section 3.5. Certificate Holder has already prepared and implemented the corrective actions that had been reviewed and accepted by Auditors in form of documentation evidences e.g. (document record/photographic/etc). Those corrective actions taken that consist of six (6) Major non-conformities, two (2) minor non conformities and three (3) non-conformities against supply chain had been closed out shall be verified during next assessment.

MUTUAGUNG LESTARI found that of Mandah POM – PT Bhumireksa Nusasejati, Sime Darby Plantation Berhad complied with the requirements of Indonesian National Interpretation of RSPO Principles and Criteria 2013 by INA-NITF, July 2016 (Endorsed by the RSPO Board of Governors meeting on 30th September 2016), RSPO P&C Certification System 2017 and RSPO Supply Chain Certification Standard For organizations seeking or holding certification Adopted by the RSPO Board of Governors on 21 November 2014 revised on 14 June 2017 (Module D for CPO Mill).

Therefore MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is continued.

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
PRINCIPLE #1 COMMITMENT TO TRANSPARENCY		
1.1	Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	
1.1.1.	<p>The company has a procedure for Information request with documents number 001 / BNS / SOU20-PI / IX / 16 dated September 2nd, 2016. This procedure describes how stakeholder communication. The Operational Management unit will send a respond letter to the stakeholders according to the contents of the request sufficiently with the respond period of 14 working days.</p> <p>However,</p> <ol style="list-style-type: none"> Based on the results of document verification and interview with the management it is known that PT BNS was established in 1990, previously a subsidiary of SAMBU Group. Then there were changes in ownership such as: the Salim Group in 1997; Kumpulan Guthrie Berhad in 2002, Minamas Gemilang in 2008, and Sime Darby Plantations in 2008. Record of land acquisition were not available again on the site. Therefore, based on interview with management and the surrounding communities in Teluk Bunian Village. There are planting compensations was carried out in the period of 2007 to 2009. However, the company has not been able to show a recapitulation of the previous land owners. The company has not been able to show evidence of fire monitoring reports to the Plantation Agency as required in the Agriculture Minister Regulation Number 05 of 2018 article 31. <p>It was conclude that:</p> <ol style="list-style-type: none"> The company has not been able to show recapitulation of previous land owners. The company has not been able to show that all obligation reporting to the relevant agencies. 	

Based on above explanation, it was raised as NCR No. 2019.01.

1.1.2.

Based on field observation and interview with internal stakeholders (gender committee, worker union, and several workers) and external stakeholders (governments, villagers and contractors) sighted that the company has provide adequate information when requested. All of stakeholders aware about type of information available to accessed and its procedure. For example:

The company shows a letter of assistance request for the 2018 period for example:

- Proposals from Mandiri Vocational High School Darul Hikmah Rotan Semelur with the number letter 01 / OSIS / SMK-MD / XII / 2018 dated November 3rd, 2018 regarding requests for funding for activities in the Sports and Art Science Week. The company responded by providing financial assistance of IDR 750,000.

Based on the explanations, the company has been responded regarding assistance request.

1.1.1	Status : NCR No 2019.01 with Minor Category	
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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.**

1.2.1.

The company has a list of the types of information that can be obtained by stakeholders, such as legal documents; environment documents; social documents; OHS documents; sustainable improvement programs documents and others. Documents that cannot be accessed by the public that are confidential include: the financial data such as expenses and income, details relating to customers or suppliers as well as data related to individual privacy. The list of stakeholders kept by PSD staff and divided by internal and external stakeholder category. The document is stored in the PSD Department room in the office of each unit. Based on field observation and interview with internal stakeholders (gender committee, worker union, and several workers) and external stakeholders (governments, villagers and contractors) sighted that the company has provide adequate information when requested. All of stakeholders aware about type of information available to accessed and its procedure.

	Status: Comply	
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**1.3
Growers and millers commit to ethical conduct in all business operations and transactions.**

1.3.1.

The company has committed related ethical policies contained in code of conduct policy which set the standards of behavior based on moral principles that exist and are used as a guideline in conducting business activities that includes a mechanism for the relationship between stakeholders. Based on interview with harvester workers, pesticide applicator, Fertilizer applicators and replanting contractor known that they already understand about company policy such as business ethic.

	Status: Comply	
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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

List of regulations which used as reference for company operational activities is presented in document of "Evaluasi Pemenuhan Peraturan Tahun 2019" or evaluation of regulations compliance for period 2019, dated 28 February 2019. The list has consist of 145 regulations which covers legal, social, safety, manpower, environment, conservation and best management practices aspects. Master of regulation document are monitored, updated, saved and distributed by Plantation Support Department (PSD) and supported by Plantation Sustainability Quality and Management (PSQM) Department. For example, evidence of regulation pursuance is presented as follows:

- Manpower aspect: Based on document review and information from Manpower Agency of Indragiri Hilir Regency, it was known that The Company has implementing minimum wages for period 2018 as in accordance with Governor Decree. Backpay (*Rapel*) evidence for period 2018 in all estate and mill had been paid in June 2018. For minimum wages in 2019 as refers to Governor Decree No. Kpts.949/XI/2018 dated 21 November 2018, adjustment is expected

to be conducted on May 2019. Furthermore, based on information from Manpower Agency of Indragiri Hilir Regency, it was known that The CH has deliver compulsory report ontime. For example, WLTk or "*Wajib Lapor Tenaga Kerja*" report has delivered to Manpower Agency in 20 December 2018.

- Safety aspect: Quarter report of OSH Committee (P2K3) has delivered to Manpower Agency of Riau Province. For example, report of 4th Quarter 2018 for Mandah and Rotan Semelur Estate has delivered through Letter No. 135/BNS-MDE/P2K3/XII/2018 dated 31 Desember 2018 and No.RSE/567/XII/2018/S dated 10 Desember 201, respectively. OSH Committee Secretary was Licensed by the Department of Manpower and unit management has provide PPE for all workers, in accordance with its HIRADC. Furthermore, permit monitoring of 29 processing machines unit has carried out properly. For example Permit for Sterilizer No. 1, Air Compressor and Boiler No. 2 are presented in Acta No. 03/E.0003/NAKERTRANS/PKHI/560, Acta No. 02/B.T/NAKERTRANS/PKHI/560 and Acta No. 05/KU/PK/IV/2017, respectively. Those Acta are expired in 22 July 2020, 18 September 2020 and 25 April 2019, respectively.

The company has establish preventive action and/or control towards risk incidence which presented in "Hazard Identification Risk Analysis and Control", which refers for Indonesian regulation. All safety aspect has comply with article 3 and has been verified during field observation.

2.1.2

Regulation on legal requirement compliance and its documentation management is presented in document No.724/TQEM-SPMS/09 Chapter 1.2 and 701/TQEM-ESH/10 which mentioned that PSD and PSQM Department has responsibility to conduct monitoring, identification, update and evaluate regulations pursuance minimum once a yearthrough internal audit. Those responsibility shall be coordinate together with other team such as legal team, OSH team, etc. According to "*Evaluasi Pemenuhan Peraturan Tahun 2019*" dated 28 February 2019, it was known that there were 8 (eight) regulations has been updated into the list. For example: Governor of Riau Decree No. Kpts.949/XI/2018 dated 21 November 2018 about minimum wages for Riau Province and Regencies; Minister of Environment and Forestry No. 14 in 2018 about inventory and determining of peat ecosystem function; and Minister of Environment and Forestry No. 15 in 2018 about water level measurement in peat ecosystem. Annual update and evaluation of regulations pursuance was distributed by PSQM to the Estate and Factory Management Units located in Area Controller of Riau Selatan. Document of evaluation were available to all levels of management. This is confirmed founded during field observation to the Office.

2.1.3

Audit of regulation compliance/pursuance has conducted annually by the Department of PSQM and PSD, as mentioned in Indicator 2.1.1 and 2.1.2. based on list review, it was known from 310 point accessed, 2 points of requirement were identified not yet implemented and 4 points were not applicable by unit management.

2.1.4

Procedure of laws and regulations update and monitoring has explained in Indicator 2.1.2. Furthermore, PIC on this matter for period 2017 to 2020 has shows through Decree Appointment of Estate Manager No. 06/BNS-MDF/03/2018 dated 02 March 2018 According to "*Evaluasi Pemenuhan Peraturan Tahun 2019*" dated 28 February 2019, it was known that there were 8 (eight) regulations has been updated into the list.

Status: Comply

2.2

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

2.2.1

PT Bhumireksa Nusasejati has 2 POM (Teluk Bakau POM and Mandah POM) and 5 estate units of supply bases (Teluk Bakau Estate, Nusa Perkasa Estate, Nusa Lestari Estate, Mandah Estate and Rotan Semelur Estate) which are covered on 2 Land Use Title (HGU) certificate. For Mandah POM with 2 supply bases which is Mandah and Rotan Semelur Estate.

- Land Use Title (HGU) number 01 year 1996 located in Riau Province, Indragiri Hilir District, Kateman Sub-District, Rotan Semelur Village for **13,900 Ha**. Valid until May 23rd 2031.
- Land Use Title (HGU) number 02 year 1996 located in Riau Province, Indragiri Hilir District, Kateman Sub-District, Tagaraja Village for **11,762 Ha**. Valid until May 23rd 2031.

Total HGU is **25,662 Ha**.

Land Right and Legality

Certificate Holder has showed several document regarding to their land legality as follows:

1. Land Use Title, Certificate No. 01 and No. 02 dated May 1996 for palm oil estate.
2. Land Use Building, Certificate No. 1 dated on October 2000 and No. 2 dated on September 2001 for mill.
3. Plantation business permit, based on Indragiri Hilir's Head of Investment Coordinating Board Head Decree No. 503/BP2MPD-IUP-PK/XII/2014/1 dated on December 19th 2014 and Head of Indragiri Hilir District Decree No. 503/BP2MPD-IUP-P/VIII/2013/1 dated on August 22nd 2013.

Based on the audit, total area that supplied to Mandah POM were **12,366.18 Ha**. In fact, some area were occupied by villagers. Certificate Holder is in the process to remove the occupation area from the HGU. Until the Re-Certification audit, HGU's revision still awaiting confirmation from national land agency.

2.2.2

Certificate Holder has had SOP of pole maintenance (6/BNS-PPB/VIII/14) which describes that the pole census is conducted each semester and pole maintenance is conducted annually. According to the field visit, there are 7 boundary poles identified in Mandah Estate and 3 boundary poles in Rotan Semelur Estate. All boundary poles that observed are well maintained. For example bondary stones on Rotan Semelur Estate, as follows:



Boundary Poles No.60



Boundary Poles No. 57

Based on document verification, there is 4 boundary poles in MDE which is 2 located in occupation area. Meanwhile, there is 9 boundary poles in RSE which is 3 of it located in occupation area. Those occupied area currently in progress to remove from HGU's.

2.2.3

Certificate Holder has had procedure of conflict resolution consisted of SOP of conflict resolution that legalized since September 1st 2012. The document describes the stages of conflict resolution through procedure of written claim/complaint and the Memorandum of Understanding. They also had SOP of the Occupied Land Compensation that was legalized since February 23rd 2012. The document describes the procedure of land acquisition (supported with the flow chart). The procedure has been consulted to the several parties. The evidence of the records are the socialization of the SOP of occupation to the settler of Rotan Semelur Village, Pelangiran Sub-District. The socialization was legalized on August 13th 2012. The socialization was attended by the village representative (Chief of Rotan Semelur Village, Secretary of Village, Chief of Hamlet, the Head of Neighborhoods Association) and Socialization of SOP of compensation request of Mandah Estate unit. It was attended by 16 participants on October 15th 2010.

Based on public consultation result with village representative of Teluk Bunian Village known that there is no land dispute or claim since 2016.

2.2.4 & 2.2.5

During the Re-Certification audit, there is no land compensation process. Whole previous land compensation documents are maintained in the Legal Division office (Plantation Services Department in AC Riau Selatan Office and in Jakarta Head Office). According to the result of stakeholder consultation by conducting field visit to the village representatives of Teluk Bunian Village, there is no land dispute or issue between the locals and Certificate Holder.

2.2.6

Certificate Holder has had policy of the prohibition to hire mercenary on Certificate Holder operational which was legalized on February 2nd 2017 by Chairman of SOU 20. Consultation with the village representatives of Teluk Bunian, there is no indicate that Certificate Holder use the mercenary in operation area.

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

Certificate Holder has had Occupational Land Acquisition Procedures, Policy Number: 343/PSD-OKUP/10, dated 2 September 2010 which explains that the resolution of land conflicts and land compensation should be carried out together with the sub-district and village as well as the compensation price must be negotiated together with landowners.

According to the result of public consultation with the village representative in Teluk Bunian Village is known that there is no customary rights nor customary land within the area of PT BNS. There is land compensation record and implementation of land compensation over the plantation area, which previously were plantations that belong to local communities. Since the previous assessment (ASA-4) until this assessment, Certificate Holder did not conduct acquisition for new land or expand area.

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 & 3.1.2

Certificate holder shows a 5-year business plan that is endorsed by the head of PSQM which includes explaining the plan to use seeds, FFB and CPO production, OER targets, Production costs, Estimated selling prices, and Revenues. For example, in 2023 FFB production is planned to amount to 323,332 tons with the amount of CPO 75,983 and revenue 706,988,965 (IDR 000).

Evaluation regarding the achievement of a business plan can be seen from the making of monthly estate and mill reports.

The report is summarized as one of the ingredients for the preparation of the annual budget. Based on interviews with plantation management representatives (Estate Manager) Estimated of the Long-term plan made by the management unit will connect with the company's long-term plan. The plans prepared are relevant because they include details of plantations and plant operations such as production targets and revenue plans.

The replanting projection is written in the Long Range Replanting Program of PT Bhumireksa Nusa Sejati. The information contained in the document includes:

Estate	Plan (Ha)				
	2017/2018	2019	2020	2021	2022
MDE	285	-	291	246	151
RSE	284	280	378	273	280

In the 2017/2018 period as stated in MMCM both the MDE and RSE plans have been realized 100%. The replanting plan will be reviewed together with the preparation of the annual budget.

Status: Comply

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

4.1

Operating procedures are appropriately documented and consistently implemented and monitored.

4.1.1

PT Bhumireksa Nusasejati is a subsidiary of Minamas Plantation. The procedure used refers to the Agronomy References Manual and Minamas Plantation Factory Operational Procedure. The procedure includes the main process of estate and factories starting from land clearing, nurseries, plant maintenance, harvesting, transportation of FFB, processing of FFB to quality testing of CPO. SOPs are available in each garden office and are available in Indonesian

Based on field visits to block G027 Division 3 MDE and block D33 Division1 RSE when circle and path spraying are known, workers have understood how to work in accordance with established procedures. For example, before being taken to the field, pesticides have been mixed first at the BSS house, the obligation to use PPE, the obligation to wash and store PPE after work, and the application of pesticides in accordance with the target and prescribed doses.

Field visits to Mandah Factory, for example, on Engine room and boilers worker have been able to explain their daily work and understanding of OHS. Thus the SOP is relevant and covers all estate operations and factories

4.1.2 & 4.1.3

Daily internal supervision is carried out by the level of supervision starting from the foreman, assistant division, senior assistant to the Estate Manager. Monthly supervision is carried out by the PSQM team as outlined in the work quality assessment report (BHS, BMS, BSS). Annual supervision is carried out by the internal audit team (GCAD) and Plantation Advisory

Any nonconformity found will be responded to by the company by making root cause analysis, corrective actions, and preventive measures. Information from accompanying staff for nonconformities found by GCAD responses to maximum nonconformities is given within 14 working days. While for repairs and improvement progress is given 3-6 months according to the action plan.

Records of PT BNS internal assessments include the following :

Plantation Advisory Report date of visit 13 - 15 May 2018 (Rotan Semelur Estate)

Key Highlights/Issues	Reccomendation	Time Frame
Manuring achievement for the period 2017-2018 is 76%	Macro Fertilizer completed in May; Micro Fertilizers completed in June	June 2018
Mission 23 : 23 in the year of 2020	Acceleration of replanting for SPH which is below 100 oil palm	On Going

Under pruning reached 30%

/ ha

Use contractor worker

On Going

Performance Monitoring Unit Visit Summary Mandah Estate Oktober 2018

Mature Upkeep	Rating
Circle and Path	4.1
Selective Weeding	4.2
Pruning	3.3
Racking	4.2
Pest & Disease	4.0
Overall Rating	3.9

*Status : Good

Structured Oil Recovery Assessment (SORA) 08 – 11 Februari 2019

Areas of Focus	PSQM Recommendations	Mill manager comments	Date of Completion
The Fiber Cyclone Fan floor is muddy and dirty	Regular cleaning	Routine cleaning every day before and after work	On going; Re-verified at the next PSQM visit
The flow of waste into the river has not been recorded properly	Record the discharge every day	Making daily routine reports on disposal of waste discharge	February 18, 2019; Re-verified at the next PSQM visit

4.1.4.

Mandah Factory has documented the whole of FFB received in a document of acceptance fruits that describes the amount (tonnage) of incoming FFB and its sender. According to documents verification and interviews with management known that Mandah Factory did not make a purchase of FFB from a third party and the entire FFB are come from Certificate Holder under the management of PT BNS i.a. Rotan Semelur Estate, Nusa Perkasa Estate, and Nusa Lestari Estate.

Status: Comply

4.2

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

4.2.1

Certificate Holder shows the procedures of managing soil fertility in the Minamas Plantation Agricultural Reference Manual document in the fertilization section (CHAPTER 8). Based on the field visit and interviews with the BMS team in block G021 Division 2 MDE and Block D34 Division I RSE, it is known that workers have known about the dosage and type of fertilizer used. For example for NPK 44 using a dose of 2 kg / oil palm. Whereas for MOP fertilizer the application dose used is 1.75 kg / oil palm. In order to apply the dosage according to the recommendations, a calibrated measuring bowl is used. The implementation of the SOP was monitored and verified by the foreman, Assistant Division, to the level of the senior Assistant and Estate Manager. In addition there is also a PSQM team whose job is to monitor and analyze the quality of work.

4.2.2

Information about manuring records is informed in the MMCM document (Monthly Management Committee Meeting). In the MMCM period of December 2018 it is known that manuring achievements are as follows:

Estate	Fertilizer	Progam (Ton)	Actual (Ton)	FFB Production	Ton Fertilizer/Ton FFB
RSE	ZnSO4	19.52	-	37,977	-
	FeSO4	12.70	12.70		0.00033
	HGFB	36.36	36.36		0.00096
	CuSO4	35.58	17.37		0.00046

	NPK44	2,599.88	2,599.88		0.06846
	MOP	709.65	707.33		0.01863
	Total	38,967	3,374		0.08883
MDE	NPK44	1,865.02	1,865.03	58,295	0.04911
	CuSO4	61.67	61.68		0.00162
	ZnSO4	55.83	53.13		0.00140
	HGFB	77.07	77.07		0.00203
	Ajib SRF	149.74	149.49		0.00394
	Sachet	138	138		0.00363
	Chelated	2,302.00	2.30		0.00006
	Total	4,649	2,346		0.06179

Based on field visit to the block D34 Division I RSE and block G021 Division 2 MDE, known that workers have been able to explain the application of fertilizers according to the established procedures, for example the right dosage, on target, and on time and must use PPE. Workers also said the used fertilizer sacks must be collected to be returned to the warehouse.

4.2.3

Soil sampling to find out nutrients in the soil is carried out every 5 years listed in the Sustainable Plantation Management SOP (724 / TQEM-SPMS / 09 dated 27 August 2010). For leaf sampling is carried out every year listed in the No EXT Serv Procedure. Kal. I-01/01 November 2005.

Soil Sampling Unit

Found in the Semi-Detail Land Survey period 2018 - 2023 conducted by Minamas Research Center. The parameter analyzed were Ph H₂O, PH Kcl, C-Organic, N, C / N ratio, P, Total P (ppm), Calcium, Mg, Sodium, Cation outer capacity, Base Saturation, and Ignition loss Copper, Zinc.

Leaf Sampling Unit

The last time was carried out in 2018 and 2019. Leaf analysis was carried out by Minamas Research Center in Teluk Siak. The elements analyzed were dry weight% ASH, P, K, Mg, Ca, and N and PPM Dry Weight elements B, Fe, Cu, Zn.

- RSE : MRC/AsstAgr/Mgr.Lab/053/I/2019, dated January 29, 2019
- MDE : MRC/Mgr.Agr/Mgr.Lab/037/IV/2018 dated April 16, 2018

In ARM stated manuring is in accordance with the recommendations and refers to the LSU and SSU results

4.2.4

Based on the results of the semi-detailed soil survey in 2018 - 2023, it was found that the entire area of PT Bhumireksa Nusasejati was peat. POME and EFB applications to the land were not carried out.

Status: Comply

4.3

Practices minimize and control erosion and degradation of soils.

4.3.1

The company has soil map with scale 1:48,000 which derived from Semi Detail Soil Survey that carried out by Param Agricultural Soil Survey (M) Sdn. Bhd in 2008, and soil depth measurement by PT BNS team in 2011. The map and report informed that there is two soil series in PT BNS, e.g. Typic Haplohemist abd Typic Sulfihemist which covers about 94.40 % and 5.60 %, respectively. According to soil map and soil survey review, it was known that fragile soil in PT BNS is mainly due to presence of deep peat soil.

4.3.2

According to topography map and semi detail soil survey review which conducted by Param Agricultural Soil Survey (M) Sdn. Bhd in 2008, it was known than slope condition in PT BNS is 100 % flat. Hence, there is no specific strategy

implemented on very steep areas (>40 %), as mentioned by Technical Guidance of Oil Palm Development (Cultivation) which issued by Directorate General of Plantation from Ministry of Agriculture in 2006. Since all estates has covers by deep peat soil, specific strategy implemented is only water management through monitoring and evaluation of water level, water table and peat subsidency.

4.3.3

Transportation of FFB and its processed products is conducted through water transportation via canals (main, collection and inspection). Hence, road (canal) maintenance in PT BNS is conducted through mechanical desilting which conducted quarterly in a year. For example, according to estate manager report, realization canal desilting in both estate for period July to December 2018, it was known that Road maintenance in Mandah Estate has carried out in line with 2018/2019 program. Furthermore, actual road maintenance is mainly carried out in Fork Canal. Estate management informed that this is due to over accumulation of Moss and water plants in Fork Canals. Based on field observation to Mandah and Rotan Semelur Estate, it was known that the canals is easily passable by water transportation devices (speed boat, pontoon, carier boat, etc.). Desilting is conducted mecanically by Moss Buldozer. Furthermore, in order to minimize water body erossion and abrasion, woody plants (ex. *Acacia* sp., *Pterocarpus* sp.), grasses, bamboo and ferns are satisfactory maintained by estate management.

4.3.4

Procedure of water management is presented in document Policy No. 01/BNS/III/09 dated 25 March 2009 and Manual Agronomy from MRC in 2012. Procedure has covers technical on spilway, weir, water level control, water gate management and conservation which devided into specific zoning. Estate management shows several evidence related to water management and peat subsidency monitoring, for example as follows:

- Daily monitoring of water level and water table through water level pole and piezometer measurement in 24 locations within Mandah Estate and 21 locations in Rotan Semelur Estate for period January to Febaruary 2019.
- Based on Peat subsidency monitoring data in Block F019 and Block G021 Mandah Estate for period 2018, it was known that subsidency rates in Mandah Estate is approximately about 0.60 cm/year. Furthermore, in Block D030 and Block D033 Rotan Semelur Estate, it was known that subsidency rates in Rotan Semelur Estate is approximately about 0.20 cm/year.

Based on subsidency rate review, it was known that during 2018, subsidency rate in both estate is bellow 1.00 cm/year. This figure indicates that water management has conducted satisfactory. Presence of piezometer and peat subsidence poles is verified through field observation. Since water factor in peat managment is very important, estate management has also conducting water conservation on the field through manitain a proper land cover crop on planting area.

4.3.5

Hydrotopography assessment as part of drainability study is conducted since October 2016 by Minamas Research Centre (MRC). Assessment has conducted through mapping on water level in all planted areas, water flow and water availability. Furthermore, data on water table and peat subsidency rate, pH and soil decomposition has also taken into account. Report assessment informed that in general, drainability critical class has classified into "non-critical drainage" which satisfactory for oil palm replanting development.

4.3.6

Strategic management for fragile soil is only applicable for deep peat area, which described in detail on procedure No. 110/EST-ARM/13 dated 16 September 2013. Based on field observation, several strategy which had implemented by estate management is presented as follows:

- Conducting water management through specific zonation; installation of water gate, spillway, sandbag or weirh; as well as monitoring and evaluation of rainfall, water level, water table and subsidency rate. Water level is maintained between 50 to 80 cm, or as recommended by Agronomist from MRC or Plantation Advisor.
- Maintenance of plants in water body sided which aims for minimizing abration and/or erosion, through selective herbicide application.
- Maintenance of canals for water flows smoothness.
- To overcome low fertility in peat soil area, estate management has carried out an on scheduled manuring program as recommended by MRC through leaf and soil sampling analysis and/or by Plantation Advisor through visual assessment.

Status: Comply

4.4
Practices maintain the quality and availability of surface and ground water.
4.4.1 & 4.4.2.

The CH has identify water sources and wetland with scale 1:200,000. There are water management on peat area procedure, it presented in several document, as follows:

- SOP No. 01/BNS/III/09 dated 25 March 2009 about water mangement. This procedure has covers water level setting and monitoring, canals installation, rainfall monitoring and evaluation, as well as water conservation.
- SOP No. 724/TQEM-SPMS/09 about riparian protection management. This procedure has covers zoning of riparian and its management technique.

Based on field observation to Block H021, Division 2 sighted that the CH have managed wetlands by installing water level stick to monitored water level. The CH has conducted also water sources quality at upstream and downstream of Kateman River. Based on water quality test result dated 27 February 2019, sighted that TSS parameter is 6,610 mg/litre at downstream and 28 mg/litre at upstream of Kateman River. It was comply with Government Regulation Number 82 year of 2001.

The water management plan and its realization are presented in the environmental management and monitoring report (RKL / RPL II semester 2018), for example:

- Installation of water reservoirs for main water intake needs as an alternative water source.
- Efficient use of water for palm oil processing.
- Monitoring water levels in transport channels and waterways that reach a height of 50-70 cm, through water gate controls.
- Planting trees and covering plants (*Nephrolepis* sp.) For soil and water conservation.

The company shows water management monitoring in 2018 period with details: Dam maintenance, Branch Canal, Canal Cliffs and nets. In addition, there is an evaluation of water management such as maintenance of dams, maintenance of canal cliffs by maintaining vegetation to prevent soil erosion and without using chemicals and installing branch canal nets to hold waste so it does not pollute the canal. Based on observation field in Block H021 Divisi 2 in peat area, they have managed peat water by installing water levels to calculate the decrease and increase in peat water surface.

4.4.3.

The company shows the permit to dispose of waste water to a water source with number 800 / DPMPTSP-SET / II / 2018/759 dated December 31st, 2018 by the Office of Investment & One-Stop Integrated Services by Indragiri Hilir Regency. With coordinates 00°06'54.8 "N & 103°33'20.7" E located in Bente Village, Mandah District, Indragiri Hilir Regency. Liquid waste testing is conducted by the Sucofindo Batam Laboratory (LP 547-IDN), based on testing results on August 2018 – February 2019, its known BOD & pH didn't exceed the threshold by Decision of environment agency Number 5 years 2014 appendix III.

4.4.4.

The company shows the efficiency of water use for processing in the Mandah Factory for the period January - December 2018 such as: Average FFB process is 8,143.84 tons; water use is 7,499.92 m³; the efficiency of using water for processing is 0.91 m³ / ton FFB with budget is 1.10 m³ / ton FFB. The average water usage for domestic is 416.17 m³ & the water use efficiency for domestic is 0.05 m³ / ton FFB.

Permit for taking surface water number 503 / DPMPTSP-SIPAP / 03 dated March 29th, 2018 by the Investment & One-Stop Services Integrated Service is valid for 2 years. Evidence of payment of surface water tax on February 14th, 2019 for the period October-December 2018 amount to IDR 5,513,100. (55,131 m³) to the Regional Revenue Agency of Riau Province.

Status: Comply

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

4.5.1

Procedures for controlling pests and plant diseases are listed in Minamas Plantation HRM section 15 and 16. Based on observed evidence such as :

1. Agronomy Reference Manual for Oil Palm Planting No. Politics: 110 / EST-ARM / 13 in 2013 section 15 concerning Plant Protection. Among them are explaining about oil palm plant pests, census methods and frequencies, controlling method (for example : Palm Leaf Eating Caterpillar – under normal conditions once a month; Rat every 3 months; Ganoderma twice a year on peat soil in immature)
2. Census Recapitulation and Control of MDE Division 1 Oryctes for January and February 2019 Periods
3. Census of Ganoderma MDE Division I - IV attacks in December 2018
4. Recap of RSE Pest and Disease for matuer and immature October - December 2018; January 2019 (Blocks D033, D034, D032, E31, E32, E33, C34) - Oryctes; Tirathaba; Nettle Caterpillar
5. Oryctes Census September - December 2018 and January 2019 RSE Division I (Blocks D33 and D34)
6. RSE and MDE consist of 5 divisions

Can be concluded :

1. Certificate Holder has not carried out a census of plant pests and diseases consistently according to what is stipulated in the Reference Minamas Plantation Agronomy Manual
2. It has not been able to show enough evidence that the census of plant pests and diseases has been carried out thoroughly for all types of potential pests and diseases and has been carried out in all divisions.

Its become **NCR.No.2019.02 with Major category.**

4.5.2.

Records of training provided by the company include:

- Beneficial Plant socialization and Rat Control Training using nests box on 16 May 2018 at the MDE office attended by 10 participants.
- The nettle caterpillar and bag worm census Training on February 17, 2018 in the MDE office was attended by 12 participants
- Training on Oryctes control on 12 July 2018 at the RSE office which was attended by 15 representative participants from each estate.

Based on interviews with MDE and RSE pest observer officers are known routine training activities has been carried out. Presenters can come from MRC or assistant division from each estate.

4.5.1	Status: NCR.No.2019.02 with Major category
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4.6
Pesticides are used in ways that do not endanger health or the environment
4.6.1

Company policies regarding safety in using chemicals are contained in ARM sections 15 and 16 concerning plant protection. Selective use of products is found in the SOP for the protection of plants such as Cypermethrin to control Palm Leaf Eating Caterpillar and Oryctes while Glyphosate is used to control both broadleaf and narrow leaf weeds.

Steps that are included to avoid the development of resistance include:

1. Using census and monitoring methods to determine the type of control to be carried out. The use of pesticides is the last alternative if the results of the study show that the intensity of pest attacks has exceeded the threshold and control threshold
2. Pesticides that are applied right on target, right dosage and on time
3. Integrate control methods physically, chemically, biologically and mechanically (IPM)

Based on the results of interviews with circle and path spraying in block D33 division I RSE it is known that spraying is in accordance with the procedure. For example, using active ingredients glyphosate combined with methyl metsulfuron. Mixing pesticides is carried out at the BSS house. So that the pesticides brought to the field are not pure ingredients and are ready to use. In every activity using pesticide, worker equipped with PPE such as mask, rubber glove, boot, and apron. Based on interview with pesticide applicator known every worker whom worked with pesticide will be conduct a medical check-up once a year. Based on the latest medical checkup result on November 2018 it was informed that

pesticide applicators from Mandah and Rotan Semelur Estate indicates fit for duty.

4.6.2

Records of pesticide use are documented in monitoring the use and toxicity of pesticides at PT Bhumireksa Nusasejati. Records of pesticide use for RSE and MDE include the following:

Estate	Trademark	Active Ingredient	Usage	Application (Ha)	a.i/Ha
RSE	Ken Up	Gliposat (48%)	3,015	7,216	0.20
	Kenly 20 WG	Metsufuron Metil (20.05%)	170	6,892	0.005
	Kenlon	Triclopir (35.66%)	59	168	0.13
	Audit	Gliposat (41%)	7	212	0.01
	Basta 15	Glufosinat (15%)	573	1,182	0.07
	Supremo	Gliposat (48%)	60	240	0.12
MDE	Ken Up	Gliposat (48%)	4,891	12,411	0.19
	Kenly 20 WG	Metsufuron Metil (20.05%)	285	12,411	0.005
	Kenlon	Triclopir (35.66%)	707	12,726	0.02
	Basta 15	Glufosinat (15%)	751	3,646	0.03
	Capture 50 EC	Cypermethrin (50%)	6,553	15,704	0.21

* LD50 information is found on the MSDS of each product

Based on observed evidence such as:

1. Monitoring the use of pesticide RSE for the period January – December 2018
2. Recapitulation of the Use of MDE Pesticides for the period January - December 2018
3. Cypermethrin use monitoring board to control Oryctes in RSE for the period 2018 and 2019
4. Recapitulation of nettle caterpillar census and control division 1 MDE (October to December 2018 period) - there is use of Achepate)

It can be concluded that the recording of the use of pesticides indicated by the Certificate Holder has not fully informed all types of pesticides used. For example the use of Achepate on MDE and Cypermethrin at RSE. This is a non-conformity No.2019.03.

4.6.3

Certificate Holder has and implements an integrated pest management plan starting with the implementation of the EWS (detection and census method). The census results are used as a reference to determine the control measures to be taken.

Based on observed evidence such as:

1. Monitoring the use of Cypermethrin MDE for the period January - December 2018 totaling 6,553 liters
2. Oryctes RSE monitoring board - Application of Cypermethrin for D33 blocks (plant age 31 months) C34 (plant life of 27 months); Census December 2018 and January 2019 D33 1.3% and C34 0.5%
3. MRC Training and Socialization to Estate - Oryctes control threshold is if the new attack is $\geq 5\%$.
4. Use of Cypermethrin period 1 March - 11 March 2019 according to the warehouse Stock Opname:
 - RSE: 180 liters
 - MDE: 273.40 liters
5. Reference Agronomy Manual for Oil Palm Planting No. Politics: 110 / EST-ARM / 13 in 2013 section 15 concerning Plant Protection, among others, states that heavy infestations in immature oil palm plants need to be subjected to chemical treatment until the plants are 24 months old (once every two weeks).
6. The results of interviews with MDE and RSE assistants stated that the reference for controlling Oryctes in Immature oil palm was ARM

Can be concluded :

1. The use of preventive pesticides to control Oryctes carried out by Certificate Holders is not yet equipped with identification of specific situations.
2. Not yet able to show plans and realization of Oryctes control in an integrated management in accordance with the principle of IPM so that it can lead to minimal use of pesticides.

Based on explanation above, It become NCR.No.2019.04.

4.6.4

Certificate holder has a complete list of WHO 1A and 1B pesticides as indicated by the OHS expert of PT Bhumireksa Nusasejati. List contained in annex 2 Procedure of Management Sustainability No. Policy 724/TQEM-SPMS/09. The Sime Darby Responsible Agriculture Charter (September 2016) document outlines that it will implement an integrated pest management program by not using paraquat or chemicals belonging to WHO 1A group. Group 1B WHO will be gradually reduced in accordance with the conventions of Rotterdam and Stockholm.

There is a Sime Darby Responsible Agriculture Charter document (September 2016) which outlines that it will implement an integrated pest management program by not using paraquat or chemicals that belong to WHO 1A class. WHO Group 1B will be gradually reduced according to the Rotterdam and Stockholm conventions.

During the period January – December 2018 there was no WHO class 1A and 1B pesticide use. Based on field visits to the central warehouse where pesticides are stored, physical stock is in accordance with what is recorded on the warehouse card.

4.6.5

One of the procedures for handling pesticides is in the SOP on Management of B3 (No 394 / IT-LB3-23 / 11 dated September 27, 2011). which explains the classification of chemicals, the person in charge, the provision of MSDS through suppliers, how to store chemicals, handling chemicals during use, actions against leaks and spills, first aid to training programs.

Pesticide applicators are special people who have received regular training and direction and are part of the Block Spraying System team. Based on interviews with the BSS team in Block D33 MDE and G027 RSE workers have been able to demonstrate an understanding of the risks and risks to the chemicals used. Workers are able to explain the spraying border, how to mix ingredients, dosage applications and target pests or weeds.

Pesticides that are brought to the field during the circle and path spraying activities are in a 1: 1 condition (between water and pesticide). Mixing is done in the mixing drum and carried out by special officers. Whereas in the Pest and Disease spray activities the material carried is pure material and mixing is done directly on the knapsack carried out by each applicator, to avoid spilling pesticides when mixing activities are used as bases from plastic buckets The company has the opportunity to ensure the mixing of pesticides is in accordance with the procedures applied.

Based on observed evidence such as:

1. Based on field visit to the block D33 Division 1 RSE found the fact that circle and path spraying workers do not use face shields and foremen using ordinary cloth masks
2. Pesticide SOP and its Management No. Poly 10x / PTK-PST / 2004 point 3 concerning pesticide use section d "Officers must wear special sleeves and long-legged protective clothing, gloves, high boots, hats and face shields"
3. MDE spraying training on 3 January 2019 the location in emplacement and block G026 was attended by 17 spray team members in the description of the procedure stating that one of the PPE that must be used was a face shield

It can be concluded that the Certificate holder has not been able to show enough evidence that the spray team has used and is equipped with adequate work safety equipment according to the established procedures. Nonconformities have been included in the indicator 4.7.2

4.6.6

The company has a Pesticide Storage SOP with (00 / SOP / PSTD / PT.BNS / EST / X / II / 2014) which was ratified on December 7, 2014. The procedures include explaining about:

- Pesticides must be stored in a safe place (warehouse that is safe or locked), separate from fertilizers, food ingredients and water sources, storage areas must be well ventilated, not directly exposed to sunlight and rainwater.
- Each type of pesticide must be placed separately according to their respective groups, namely herbicides, fungicides and insecticides.

The results of field visits to the MDE and RSE pesticide storage warehouse are known to be in accordance with established procedures. The warehouse is equipped with symbols and MSDS. Results of field visits to MDE and RSE housing are known to have no jerry cans of pesticides used for other purposes. Used pesticides are stored in temporary hazardous waste shelter and the numbers are recorded and monitored.

4.6.7

The Company has Pictorial OHS Palm Oil guidance (No.722/PSQM-PSS/10 dated December 13, 2010) that describes the work instructions of pesticide applications governing applicable PPE, warning signs, spray training courses, emergency response, Spray worker facility (BSS house) for equipment storage, PPE and mixing place up to storage of used jerry cans in hazardous waste storage.

Based on interviews with spraying workers at MDE and RSE it was explained that the workers had been trained and the workers could explain the safety of spray activities, such as the applicable PPE, the pesticide mixing activity was done in a special place (BSS house) and after Spray activity is finished the PPE and spray equipment must be cleaned and stored in special place (BSS house).

4.6.8

Based on interview with spray workers, foremen, and estate managers airborne pesticide application has never been done. Field observation to workshops and pesticide storage warehouses did not find any facilities and infrastructure to apply airborne pesticides.

4.6.9

Estate management has provided training of pesticide handling for pesticide applicators, store keeper and Upkeep Foreman, which aims to maintain workers knowledge and skills towards pesticide safe application and management, for example Socialization of Block Spraying System (BSS), HIRAC and MSDS in Rotan Semelur Estate has conducted on Division 1 Field D033 in 12 December 2018, attended by 9 workers. Meanwhile, socialization of Pesticide Application and first Aid in Mandah Estate has conducted on Block H026 in 11 February 2019, attended by 18 workers. Based on interview with pesticide applicators in Block G027 Mandah Estate and Block D033 Rotan Semelur Estate, as well as Store Keeper in Block Spraying System (BSS) where located within Estate Housing Complex area, it could be concluded that the workers were able to explain and demonstrate pesticide handling technique such as pesticide mixing, storage of used containers on the Hazardous Waste Store and can't be reused for domestic purposes, PPE to be used, emergency action of pesticide incidence and cholinesterase testing which conducted once a year. Furthermore, Pesticide Store has already equipped with hazardous symbols, MSDS, PPE and other emergency facilities such as first aid kit box, fire retardant, etc.

4.6.10.

Certificate Holder has a Hazardous Material Handling Procedure (RSPO / P & C / PB3 dated August 2, 2010) approved by SOU Chairman. In addition, Certificate Holder has identified the risk of applying pesticides in the HIRAC document. The Company showed a manifest record of hazardous waste transported date November 1st, 2018 to the transporter PT Desa Air Cargo Batam vehicle number BP 9186 DU with details:

- Used packaging number JL 0063239 as much as 4,851.16 kg.
- Contaminated waste / packaging JL 0063241 as much as 1,300.41 kg.

4.6.11

Estate management shows list of pesticide applicators, which totaling about 17 and 30 applicators is Mandah Estate and Rotan Semelur Estate, respectively. From those two estate, there is only 2 male workers who works in Mandah Estate. Medical testing is conducted by Clinic Central (or *Klinik Pratama*) of PT BNS in Teluk Bakau Estate km 05. Parameter tested are six physical parameters, urin (bilirubin and urobilogen), spirometry, Iscihara and snellen. Summary or medical check ups presented as follows:

- Based on record of medical check up testing which conducted in November 2018, it was informed that pesticide applicators from Mandah Estate tested indicates fit for duty with minor correctable defect. Hence, all applicators are required to work in accordance with procedure and always use a proper PPE as recommended by HIRAC and MSDS.
- Based on record of medical check up testing which conducted in 08 November 2018, it was informed that all pesticide applicators from Rotan Semelur Estate tested indicates fit for duty with minor correctable defect. Hence, all applicators are required to work in accordance with procedure and always use a proper PPE as recommended by HIRAC and MSDS.

Socialization of medical test result is carried out in 05 March 2019. Record of medical history has also been kept by doctor company and saved on Central Clinic. The testing has also included for fertilizer applicators and BSS workers.

4.6.12

According to the list of pesticide applicator data, it was known that there were totalling 17 and 30 female applicators in Mandah Estate and Rotan Semelur Estate, respectively. Furthermore, based on interview with female pesticide and/or fertilizer applicators in Block G027 Mandah Estate and Block D033 Rotan Semelur Estate, it was known that H1 and H2 Leave is given by estate management as recommended by company Clinic. Detection of pregnancy was conducted by the company clinic every month by rapid kit test for pregnancy detection. Furthermore, applicators also stated that those who positively detected will not be allowed to work with agro-chemicals and will be transferred into manual upkeep works. Based on document review, it was known that there is no pregnant and/or breastfeeding applicators in 2018 to March 2019.

4.6.2 Status: NCR.No.2019.03 with Major category

4.6.3 Status: NCR.No.2019.04 with Major category

4.7

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

4.7.1

There is no change of safety policy, which presented in Head Plantation Upstream Indonesia dated December 2011. The Company is committed to provide a safe working environment for all employees and visitor, as well as strive to facilitate a proper protection for workers and company asset which aims to avoid accident and damage incidence. The policy is available in Bahasa. Socialization has been conducted to all employees include contractor and visitor through safety briefing before starting activities on the sites. This is confirmed during audit. Based on interview with workers in estates and mill, it was informed that safety briefing is conducted daily during muster morning. Socialization of occupational health and safety (OSH) is conducted annually. For example, OSH socialization in Mandah Estate has been carried out in 19 December 2018. The company shows OSH program for period 2018 and 2019, issued by Secretary of OSH Committee (P2K3) and Manager, as follows:

- OSH program in Mandah Estate consists of three main subjects, e.g.: management OSH Environment (K3L), K3L preparation (HIRAC) assessment and review/update MSDS, and program of K3L activity. Among programs in the latter subject are PPE implementation, P2K3 meeting, emergency devices monitoring, work health program, communication program towards threats, MSDS socialization and trainings.
- OSH program in Mandah Factory consists of six main subjects, e.g. OSH training, emergency simulation, safety meeting, emergency devices monitoring and medical check up.
- OSH program in Rotan Semelur Estate consists of six main subjects, e.g.: OSH training, emergency simulation, safety meeting, emergency devices monitoring and medical check up.

Several evidence of OSH Program implementation are conducting monthly P2K3, reporting quarter P2K3 report to Agency of Manpower, monitoring of first aid box and fire extinguisher, training on first aid, etc. Based on field observation to Mandah Factory, Mandah Estate and Rotan Semelur Estate, it was found that safety policy has displayed on the Office and Stations. Furthermore, workers in Mill and Estates informed that company management has delivered socialization towards safe working practices through training, safety briefing and safety meeting during daily morning muster. Thus, according to document review and field observation, it could be concluded that OSH program and implementation in CH management unit is in line with Indonesian regulations.

4.7.2

Procedure of Hazard Identification Risk Assessment and Control (HIRAC) is presented in procedure No. 7301/PSQM-ESH/11 dated 07 July 2011. Company management is able to show HIRAC document which issued by the respective OSH Committee Secretary and Estate/Mill Manager. However, several notes regarding company HIRAC is presented as follows:

- HIRAC is not covered all activities in Estate or Mill, for example, there is no HIRAC for boat movement among drainage zone by crane; diesel filling to tugboat.; canal maintenance; WTP chemicals transportation from storage area under loading ramp to WTP Station, etc.
- Traceability of HIRAC evaluation is not available.
- Risk category assessment (EPR) for HIRAC in Rotan Semelur Estate is not available.
- Based on observation to pesticide application activity in Block G027 Mandah Estate and Block D033 Rotan Semelur Estate, it was known that all applicators did not wear goggle and/or Face Shield as required in HIRAC.
- Based on observation to FFB Grading Station, it was known that the respective workers did not wear safety shoes which already provided by Mill management.
- Hazard analysis in Estate HIRAC for pesticide application did not mention risk of chemical exposure.

According to the points above, raised **NCR No. 2019.05 with Major category**.

Record of accident is presented in document of OSH Quarter Report. Evaluation towards accident was carried out by OSH Committee Secretary through monthly meeting, describes in detail on quarter P2K3 report.

The CH management has conducting annual medical and special surveillance for workers. This is confirmed during interview with mill and estate workers. For example, summary of special medical surveillance is presented as follows:

- Based on record of medical check up testing which conducted in November 2018, it was informed that all 45 agrochemical applicators from Mandah Estate tested indicates fit for duty with minor correctable defect. Hence, all applicators are required to work in accordance with procedure and always use a proper PPE as recommended by HIRAC and MSDS. The noise level monitoring on particular area, were more than 85 dbA. The test results of air and noise dated August 29th, 2019 located in the Mandah Mill workspace (N 00°06'56.3 "and E 103°32'55.6") by an accredited laboratory (LP412 IDN) as follows:

Parameter	unit	The results	Threshold
Noise	dBa	66.10	85
Vibration	mm/second	0.65	40

Based on that, the parameter of noise and vibration didn't exceed the threshold by Decision of Environment Minister Number 49 year 1996. The annual audiometry, occupational, & medical history record were available. The results was indicated there is no hearing loss due high noise level. The company has provide earplug to overcome this situation.

- Based on record of medical check up testing which conducted in 08 November 2018, it was informed that all 43 agrochemical applicators from Rotan Semelur Estate tested indicates fit for duty with minor correctable defect. Hence, all applicators are required to work in accordance with procedure and always use a proper PPE as recommended by HIRAC and MSDS.
- Based on record of medical check up testing which conducted in 05 November 2018. It was informed that 45 operators tested has indicated fit for duty with minor correctable defect, meaning required a proper PPE (earmuff or earplug)

4.7.3

Estate and mill management is able to show monitoring on operator license as well as evidence on extension when expired, for example as shows in Letter No. 161/SK/AP/III/2018 dated 13 March 2019 for 3 Crane Operators Class 3 and 1 Operator Engine Room for Mandah Factory. License of water transport for 19 drivers, 1 OSH Crane Operators and 1 electrician in Mandah Estate are available. All licenses are mostly expired in 2020 and 2021. Furthermore, Licence of 1 operator of RB Crane, 2 operators of excavator, 1 welder and 1 electrician are expired in 22 April 2021 and 05 May 2021.

Socialization and training on safety has conducted in all unit. For example, training on safety towards pesticide application in Mandah Estate has delivered in 24 February 2018. Furthermore, all PPE has given to all workers has properly

conducted by the company. Broken PPE could be replaced by reporting and shown the evidence to workers upper ordinate. Stock of PPE extra 10 % is available on the sampled unit.

4.7.4

Company occupational safety and health monitoring and implementation is carried out by OSH Committee (P2K3), as follows:

- P2K3 for Mandah Factory legitimation shows through Decree of Manpower Agency of Riau Province No. 605/Disnakertrans-PK/SK-P2K3/III/2019 dated 04 March 2019, with OSH Secretary was OSH Expert as shows through Decree on Minister of Manpower No. KEP.P.7833/NAKER-BINWASK3/IX/2017 dated 20 September 2017 (valid for 3 years).
- P2K3 for Mandah Estate legitimation shows through Decree of Manpower Agency of Riau Province No. 560/NAKERTRANS-HISK/P2K3/07 dated 21 December 2018, with OSH Secretary was OSH Expert as shows through Decree on Minister of Manpower No. KEP.P.1250/NAKER-BINWASK3/X/2016 tanggal 24 Oktober 2016 (valid for 3 years).
- P2K3 for Mandah Estate legitimation shows through Decree of Manpower Agency of Riau Province KPTS.560/Disnakertrans/2019/189 dated 16 January 2019, with OSH Secretary was OSH Expert as shows through Decree on Minister of Manpower KEP.34256/NAKER-BINWASK3/XII/2018 dated 31 Desember 2018 (valid for 3 years).

All of OSH Expert License were still valid and/or ongoing for extension, but they are noted under PT Anugerah Sumber Makmur which was subsidiary company of PT Minamas Plantations for Sumatera Region. Records of OSH monthly meeting was available, and presented in P2K3 report. For example meeting of P2K3 in Mandah Estate, Rotan Semelur Estate and mandah Factory are presented in document No.135/BNS-MDE/P2K3/XII/2018 dated 31 Desember 2018, No. RSE/567/XII/2018/S dated 10 Desember 2018 and No. 003/P2K3/IV/2018 dated 11 Januari 2019 respectively. Based on interview with OSH committee representatives from Mandah Factory, Mandah Estate and Rotan Semelur Estate, it was known that P2K3 meeting has conducted regularly. Minutes of meeting were available.

4.7.5

Procedure of emergency is presented in several documents, i.e. document No. 722/PSQM-PSS/10 dated 13 December 2010 about OSH manual; document No. 711/TQEMS-P2K3/07 dated 23 November 2007 about OSH, HIRAC, etc; and document No. SOP-PK/08-LMI dated 01 April 2013 about fire emergency. All procedures are provided in Bahasa. The company has monitor and evaluate any accident in the unit. Evaluation accident record, as well as its follow up is presented in OSH Committee meeting and quarter P2K3 report. Furthermore, complement/supportive documents such as evaluation, investigation, evaluation, reporting, safety assessment, HIRAC evaluation, medical letter from paramedic (doctor) for leave were available. Any leave or manday lost cause by work accident were still paid by CH management. This is confirmed during interview with Labour Union. Record on accident has reported to the Manpower Agency.

Training of first aid in all unit is delivered by company doctor annually. For example, first aid training in Mandah Estate and Rotan Semelur Estate has conducted in 15 February 2018 and 16 February 2018, respectively. This is confirmed during interview with Foreman in all units. Furthermore, company management is able to shows investigation and evaluation of accident, for example accident causing 2 mandays (category 4) lost in Rotan Semelur Estate on 20 February 2019. Medical recommendation was to be handled by Hospital Awal Bross in Batam. Cost of accident is covered by company and BPJS. Manday lost is paid by the company, and it was included on P2K3 meeting evaluation. Based on observation to sampled estate, it was known that all Foreman were equipped by first aid kit. Furthermore, first aid kit box which installed on estate and mill buildings were satisfactory monitored.

4.7.6

Based on document review and interview with workers in Mandah Estate, Mandah factory and Rotan Semelur Estate, it was known that all workers were covered by BPJS Manpower (BPJS-TK) and Health (BPJS-Kes). For example, BPJS Manpower of all units has been paid on 07 February 2019, totalling for about IDR 271,833,499. Meanwhile for BPJS Health, it has been paid on the same date with total payment of IDR 140,756,193. Detail of payment is presented on the checklist. However, based on review towards agreement with replanting contractor PT Mitra Karya Jaya Perdana No. 012/Replanting/BNS/2018 dated 29 June 2018, it was stated in Article 9 that manpower insurance for contractor workers shall be covered by contractor. However, evidence of registration and payment is not available. Thus, company management do not have mechanism to ensure that all contractor workers are covered by accident insurance. raised **NCR No. 2019.06 with minor category.**

4.7.7

The CH shows recapitulation of lost time accident in Mandah Factory, Mandah Estate and Rotan Semelur Estate. For example recapitulation for period January to December 2018 is presented as follows:

Unit	Total			FR	SR
	Non-LTA Cases	LTA Cases	Manday Lost		
Mandah Factory	-	2	10	27	7
Mandah Estate	40	28	25	29	10
Rotan Semelur Estate	32	4	7	8	4

Evaluation of matrix above is presented in OSH Committee meeting and quarter P2K3 report.

4.7.2 Status: NCR.No.2019.05 with Major category

4.7.6 Status: NCR.No.2019.06 with Minor category

4.8

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

4.8.1

Company management is able to shows list of employee for period 2019. Training program for period 2018/2019 has also available, and recorded by PSQM Department. For example among taining which has conducted during 2018 is presented as follows:

- Socialization of Block Spraying System (BSS), HIRAC and MSDS in Rotan Semelur Estate has conducted on Division 1 Field D033 in 12 December 2018, attended by 9 upkeep team workers.
- Socialization of Pesticide Application and first Aid in Mandah Estate has conducted on Block H026 in 11 February 2019, attended by 18 workers.
- Training on beneficial plant and rat control by adopting barn owl (nests box) for IPM team of MDE has conducted in 16 May 2018, attended by 10 participants.
- Training on *Oryctes rhinoceros* (Rhinobeele) control has conducted on 12 July 2018 in RSE office, attended by 15 representative participants from each estate.
- Training on Boiller safety has conducted in November 2018.

The training of safe working practice on high noise level area has been given during OHS socialization regularly.

According to explanation above, it could be concluded that training program has been carried out as scheduled. Evidence of training such as subject of training, attendance record, picture documentation and so on are available. However, company management is encourage to conduct monitoring evaluation of training realization progress againts the annual training program. **OFI**.

4.8.2

Record of training based on personnal competency were available. For example, several training which required to employee and contractor workers during 2018. For example, pesticide applicators in all estates is required to follows several trainigs such as safety town hall, early warning system, HCV and conservation matters, safe pesticide application, MSDS and HIRAC of pesticide. Furthermore, welder in Mandah POM is required to follows safety town hall, PPE socialization, emergency and fire drill.

Status: Comply

PRINCIPLE #5 Environmental responsibility and conservation of natural resources and biodiversity
5.1

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

5.1.1.

Environmental impact assessment in AMDAL document and Environmental Impact Management and Monitoring Plan (RKL-RPL document) for estate and mill. EIA for MDE and RSE are detailed in EIA document of PT BNS year 1996 authorized by Ministry of Agriculture, Agribusiness Department with decree no. 07/BA.5.3/V/1996 dated 17 May 1996. The document was revised on 2006 and approved by head of Environment, Mining and Energy Agency of Indragiri Hilir

District. The EIA document cover environmental issues on degraded air quality, peat subsidence, potency of land fire, degraded water quality and disturbance on water biota and social restlessness. There is a matrix of the said potential environmental impact management and monitoring as company obligations on its operational. The assessment has been include consultation with relevant stakeholders to identify impacts and develop mitigation by public hiring with AMDAL Commission and surrounding village.

Meanwhile, for MDF the EIA document is UKL-UPL document of Mandah POM authorized by Environment, Mining and Energy Agency of Indragiri Hilir District, Decree no. 660/DLHPE-PDL/XI/2008/289 dated November 13th, 2008 with mill capacity of 45 ton/hour. The document covers environmental issue on planning activities of mill, potential environmental impacts, environmental management, monitoring and reporting. Based on interview with environment agency in Indragiri Hilir, and communities from Parit Gurah Baru Sub-Village. There is no issues regarding waste water pollution and disturbance of environment. The company has sent mandatory report regularly.

5.1.2 and 5.1.3.

Mandah Estate and Rotan Semelur Estate based on the revised document of *RKL/RPL* in 2006, the monitored impacts are as follows:

- Decreased air quality.
- Changes in the nature of the soil.
- Potential land fires.
- Decreasing river water quality and disruption of water / river fish biota.
- Community anxiety / social conflict.

Mandah POM based on *UKL/UPL* documents it is known that the impacts monitored are as follows:

- Reduced canal water availability
- Canal lip damage
- Decreased air quality and noise
- Decreased quality of surface water
- Management of liquid waste
- Population income and community attitudes and perceptions
- Management of hazardous waste
- Public unrest.

The company shows replanting studies in Rotan Semelur Estate 2019 period which inform the stages of activities, impacts that occur and mitigation, for example:

- Making a planting hole
- Fertilizing planting holes
- Dilute and plant seeds
- Planting nuts
- Fertilizing nuts
- Weed control.

Based on the description above, the company has implemented a matrix of *RKL / RPL* management & monitoring.

	Status: Comply	
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5.2

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

5.2.1.

The company has identified HCV areas include with land title and RTE species found in CH operational area. The HCV identification was conducted by Yayasan Kelapa Sawit Berkelanjutan Indonesia (YASBI) on 16 October 2010. A public

consultation was held on 4 December 2009, there were 76 participants from the district and sub-district Kateman, District Mandah, and villager around estate. Based on statement area in 2019, it is known that there are 705.26 ha of potential HCV (MDE & RSE) in occupied by local communities.

Based on monitoring wildlife in 2018, species found such as *macaca fascicularis*; *macaca nemastriana*, *Mycticebus coucang*, *Lutra lutra*, *Felis viverrinus*, *Heliastur indus*, *Manis javanica*, *Ichtietaetus malayensis*, *Copyscus saularis*, *Pycnonotus goiavier*, *Garule cinerea*, *Arachnothera sp*, *Pygnonotus squamatus*, *Egretta alba*, *Todirhampus choris*, *Pyton sp*, *Naja naja*, etc.

Based on area statement 2019, there is no land clearing on November 15th, 2018, the activities carried out by the company are replanting activities. For planting above 2005, it has been explained in the indicator 7.3.1.

The management plan has containing appropriate measures. For example, observation of flora and fauna, security patrol or monitoring in HCV area, and enrichment wit peat plant, monitoring of fauna every once a year. While based on observation visit in **HCV Area, in Block 29/30, Division 5**. Sighted that HCV area were occupied by villager on bad condition. All of HCV area had been planted by hybrid coconut. However the CH had conducted regular socialization to them about HCV protections.

5.2.2 and 5.2.4.

The company shows management program for potential HCV in 2019 such as:

- Observation of flora and fauna in HCV 1 NPE (Forest Conservation).
- Security patrol or monitoring in HCV area.
- Check and maintain the signboards area.
- Observation of flora / fauna in the potential area of HCV 1,3,4 NPE (occupied areas).
- Examination & maintenance of potential signboards for HCV 1, 3, 4 (occupied areas).
- Socialization of HCV to the community / workers in the potential area of HCV-1
- Evaluation of potential HCV area management programs
- Reporting on flora and fauna to the conservation and natural resource centers in Province.

The company shows evaluation of HCV management for semester II of 2018 (July - December 2018). Problems in the management of HCV areas, such as the determination of HCV areas that have been occupied by local communities (HCV1); 3 in RSE; Potential of HCV-1 & 3 in NPE & Potential HCV-4 in RSE & NPE (Borders of Large Dendan River). The potential area its cause conflict between the company and local communities. The programs carried out include regular monitoring (once every 3-4 months); washing the river Dendan to support the public transportation and transportation of plantation production which has a positive impact on the economic growth of the surrounding community.

5.2.3.

Disciplinary Policy listed on memorandum with number SOU 20 No. 3- / SOU20 / XII / 2015 dated 20 December 2015 regarding the prohibition of hunting, killing, harming and keep or collecting protected flora and fauna. There is HCV socialization to communities / workers in potential areas of NKT-1 NPE in October and April 2018. Based on interview with workers and communities around the plantation, during now workers have known that the existence of prohibition of wildlife hunting and sanctions will give if they hunting, keep and collecting wildlife.

5.2.5.

Regarding to the HCV area that are occupied by the Villagers, Certificate Holder has held a meeting on agreement of HCV area management. The meeting was held on 17 February 2016 in Teluk Bunian and Parit Sabak Jantan Villages (MDE) and on 10 February 2016 in Sungai Dendan, Parit Baru and Cahaya Baru Villages (RSE) discussing on protection on RTE species, avoidance of water body contamination and mutual agreement on the potential HCV management by the Villagers without company intervention but acknowledging the existence of RTE species identified in Certificate Holder HCV identification.

Status: Comply

5.3

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

5.3.1.

The company has identify the source of pollution and waste as listed in the PT BNS Identification of Waste Source Document covering information on kind of waste, source of waste, pollution generated, impact and reduction effort recommendation. For estate example; Domestic waste & Hazardous waste (used lubricants, used pesticide containers, used battery, etc.) and for mill example; Hazardous waste materials such as used lubricants, used fertilizer sacks, used battery, used lamp, used/contaminate fabrics, etc.); Solid or decanter cake; Kernel shell; Empty fruit bunch (EFB) and Fibre.

Mill activities which caused pollutions were identified from processing stations such as Engine Room, Boiler, Incinerator, WWTP, etc. Among GHG identified from those stations are NO₂, SO₂, CO₂, NH₃, HF, CH₃ and H₂S. Mill management has mentioned that company has carried out several strategy which aims for GHG mitigation purposes, i.e. periodic monitoring and maintenance, training for operators and operation of devices in accordance with technical guidelines.

5.3.2.

Hazardous Temporary Storage Permit for Mandah Factory No.503 / BP2MPD-IPSL.B3 / III / 2014/02 by Regent of Indragiri Hilir dated March 13th, 2014 and valid for 5 years and for Mandah Estate with number 503 / DPMPTSP-IPSL.B3 / 2 by the Investment & Service One Door Service of Indragiri Hilir Regency on March 15th, 2018 valid for 5 years. Based on interview with officer of hazardous waste storage. They have been trained related on environmental requirement (pesticide handling, PPE, early warning system, safety, and others).

The Company showed a manifest record of hazardous waste transported date November 1st, 2018 to the transporter PT Desa Air Cargo Batam vehicle number BP 9186 DU with details:

- Clinic waste Number JL 0063235 as much as 175.09 kg.
- Used oil number JL 0063236 as much as 7,077 kg.
- Used manifest filter number JL 0063237 as much as 602.62 kg.
- Ex-manifested Accu number JL 0063238 as much as 645 kg.
- Used packaging number JL 0063239 as much as 4,851.16 kg.
- The former lights number JL 0063240 as much as 11.52 kg.
- Contaminated waste / packaging JL 0063241 as much as 1,300.41 kg.

The collective agreement with number 002 / SPK / BNS / IX / 2018 dated September 24th, 2018 between PT BNS & PT Desa Air Cargo Batam for the transportation and destruction of hazardous waste is valid from September 17th, 2018 to November 17th, 2018. PT Desa Air Cargo Batam has obtained an extension of hazardous waste management license for collection and utilization activities from the Ministry of Environment and Forestry Number SK 417 / MenLH-Secretariat / 2015 valid for up to 5 years.

5.3.3.

The company has conducted waste management such as:

- Liquid waste: Mandah Factory has WWTP facility to treat the effluent to meet the quality standard regulated for effluent discharge to water body. The treated effluent quality is tested monthly and report it to the related agency by quarter effluent report.
- Ex-agrochemical container is sent and kept in company's licensed hazardous waste storage. The balance sheet is updated and well recorded. There is a record of hazardous waste transported to licensed third party in form of hazardous waste manifest. The company has the copy of the transporting company licensed and has a working agreement. The company regularly reported the update hazardous waste balance sheet in three monthly report and sent it to Environment Agency of Indragiri Hilir District.
- Medical waste: The Company kept its medical waste in licensed hazardous waste storage since the license allowed medical waste storing as per license regulated. The hazardous transporting company has a permit to transport and handle medical waste.

Based on field observations are known:

1. There is (frond burning activities between coconut tree) Located in Division 4 Block I 026 MDE and around the Office of Division 3 & 4 RSE it is known that there is burning of domestic waste and weeds.

2. The distance of landfill is located near the MDF Housing within less than 50 meters.

Based on the explanation above it is known that:

1. Points (1) are not in accordance with the RSPO No 3.62 / Waste No waste management procedure dated January 1st, 2019 in point 5.1 which states that all waste produced by households must be disposed of in a landfill.
2. Point (2) is not in accordance with government regulation No. 81 of 2012 that in article 23 it is stated that the distance of landfill from housing is more than 1 kilometer by considering leachate pollution, odor, spread of disease vectors and social aspects.

Based on that, it's become **Nonconformance No.2019.07 with minor category**.

5.3.3 Status: NCR.No.2019.07 with minor category

5.4

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

5.4.1.

The company shows the efficient use of fiber and shells for the period 2018 (Jan - Dec) for Mandah Factory. It is known that the average CPO (tons) is 21,635.40 tons; the average shell production is 4,886.31 tons; fiber amount to 12,704.40 tons; the average shell used is 3,518.14 tons; the average fiber used is 9,147.17 tons; the use of diesel fuel is 184,113 tons; use of diesel efficiency of 0.33 diesel / ton CPO; shell efficiency of 0.19 shells / ton CPO and fiber use efficiency of 0.49 fiber / ton CPO. Based on that data, it is known the average efficiency for 2017 for generator is 5,497 litre/ton FFB, turbine electricity is 27,56 kwh/ton FFB. Efficiency for fibre is 0.128 ton/ton FFB and for shell is 0.0492 ton/ ton FFB. The average efficiency for 2018 is using efficiency for fibre + Shell is 0.18 ton/on FFB, efficiency for electricity (kWh) 0.07 kwh/ton FFB and for fuel is 0.01 litre/ ton FFB.

Based on that, the use of diesel fuel is less compared fiber and shell. It can be called efficient because the company substitute diesel fuel by using renewable energy. The use of Diesel fuel is 184,113 tons, fiber use is 12,704.40 tones and shell use is 4,886.31 tons.

Status: Comply

5.5

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

5.5.1 and 5.5.2

The company has a zero burning policy and no-burn statement contained in the Guidelines for Sustainable Plantation Management No. Policy 724 / TQEM-SPMS / 09 which contains company policy regarding land clearing without burning for replanting activities.

Based on information obtained from representatives of the surrounding village community, workers, and consultations with the Environment Agency it was known that there had never been land clearing or replanting activities using fire.

Status: Comply

5.6

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

5.6.1 & 5.6.2.

Mill activities which caused pollutions were identified from processing stations such as Engine Room, Boiler, Incinerator, WWTP, etc. Among GHG identified from those stations are NO₂, SO₂, CO₂, NH₃, HF, CH₃ and H₂S. Mill management has mentioned that company has carried out several strategy which aims for GHG mitigation purposes, i.e. periodic monitoring and maintenance, training for operators and operation of devices in accordance with technical guidelines. There was checking of PPE using before go to work. The company has given PPE to workers according with HIRAC identification.

5.6.3.

The company shows the recording of GHG using Palm GHG Version 3.0.1 PT BNS – Mandah Mill period 2018 as follows:
Summary of Net GHG Emissions.

Emissions per Product	tCO ₂ e/tProduct
CPO	22.71
PK	5.06

Production	t/yr
FFB processed	97613.596
CPO Produced	21635.404

Extraction	%
OER	22.16
KER	5.19

Land use	Ha
OP Planted area	12008.04
OP planted on peat	12008.04
Conservation (forested)	0
Conservation (Non-forested)	9.43
Total	128008.04

Summary of field emissions and sinks

	Own Crop			Group		3 rd Party	
Emissions	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e/t FFB	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e	tCO ₂ e/ha
Land conversion	128474.21	14.92	1.31	0	0	0	0
*CO ₂ Emissions fertiliser	10145.88	1.22	0.11	0	0	0	0
**N ₂ O Emissions	67768.21	8.13	0.71	0	0	0	0
Fuel Consumption	2957.18	0.4	0.03	0	0	0	0
Peat Oxidation	456315.4	54.6	4.79	0	0	0	0
Sinks	0	0	0	0	0	0	0
Crop sequestration	-78239.98	-9.36	-0.82	0	0	0	0
Conservation Sequestration	-2.86	-0.01	0	0	0	0	0
Total	587418.04	69.9	6.13	0	0	0	0

Summary of Mill Emissions and Credits

	tCO ₂ e	tCO ₂ e/tFFB
Emissions		
POME	18295.41	0.19
Fuel consumption	663.87	0.01
Grid electricity	0	0
Utilization		
Credits	0	0
Export of grid electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	18959.28	0.2

Palm oil Mill Effluent (POME) Treatment

Divert to compost	0	%
Divert to anaerobic digestion	100	%

POME Diverted to Anaerobic Digestion

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

The test results of air and noise dated August 29th, 2019 located in the Mandah Mill workspace (N 00°06'56.3 "and E 103°32'55.6") by an accredited laboratory KAN Binalab LP412 IDN, with details below:

Parameter	unit	The results	Threshold
Noise	dBa	66.10	85
Vibration	mm/second	0.65	40

Based on that, the parameter of noise and vibration didn't exceed the threshold by Decision of Environment Minister Number 49 year 1996.

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 and 6.1.2

During Re-Cert, there is no change of social impact assessment (SIA) report. The CH still using SIA report that have been made in January 2010, including records of meetings and evidence of participation with affected parties. The CH using SIA report 2010 as a guidelines and reference to manage of social issues within their activities. Due to replanting activities is still ongoing, the CH also conducted SEIA in period 2015 – 2017 by third party consultant were focused on replanting activities only. This assessment also involved an affected parties through participatory ways. All the records and evidence of stakeholder involvement is available in the document. Interview with community show that CH social impact assessment has cover issue from stakeholder such as job opportunities and social unrest.

6.1.3

CH has management plan to reduce negative impact and increase positive impact, such as give assistance to community and canal maintenance as an access. Plans for management and monitoring of social impacts to avoid or reduce negative impacts and promote positive ones, based on social impact assessment, It has been consulted with the affected parties.

6.1.4

However, CH has not been able to show evidence of a review / evaluation of the social impact management plan at least every 2 years. This is become **Non-conformity No. 2018.05 with minor raised to be Major**.

6.1.5

CH does not have smallholder scheme, all the FFB sources is from own estates. Surrounding commodities that cultivated by the local communities is coconut trees.

6.1.4 Status: NCR No. 2018.05 with minor raised to Major category

6.2

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

6.2.1 and 6.2.3

Procedure of communication and public consultation is presented in document No. RSPO/6.2/KKM (Rev. 00) dated 28 July 2009. Socialization towards communication procedure to surrounding communities had been conducted since 2009, as verified during previous audit assessment. Based on interview with representative from Village of Teluk Bunian, it was known that there is no nothing important to be discussed with company management since there is conflict or unsettled

problem with village communities. Estate management has considered open and transparent in solving any problem regarding with land dispute and compensation matters.

List of stakeholder for period 2018/2019 is available, consist of 71 government institutions (Indonesia, Province, Regency, Sub-Regency and Villages), 14 internal organizations (Labour Union, Gender Committee, Cooperatives), 13 external organizations (included NGO), 5 Suppliers, 11 Contractors, 7 educational institutions, 17 community elders and smallholder representatives, as well as other institutions such as hospital, insurance and banking or financial companies. Based on interview with representative from Villages and representative of Government Agencies in Indragiri Hilir, it was known that those stakeholders had understood towards information and communication mechanism of PT BNS. Furthermore, the Company has considered transparent and cooperative in providing information and/or data requested. Communication record with stakeholder was recorded on "Surat Masuk" (or Letter-in), while the response has recorded on document of "Surat Keluar" (or Letter-out). For example, according to the list in RSE and MDE, it was known that all letter has been responded less than one month.

6.2.2

Person in charge for communication matters with stakeholders is still the same person which his appointment is presented in document No. 123/RSS-pod/IX/2012 dated 03 September 2012. The respective PIC is familiar with surrounding villages, as verified during previous audit assessment.

Status: Comply

6.3

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

6.3.1

The mechanism, open to all affected parties, disputes resolution in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested, as long as that information is supported with adequate initial evidence is following their procedure (Complaint Resolution Procedure). CH also has had corporate code of conduct, where described that *'all employee can express their opinions and aspirations to the company and it will be respected and kept confidential'*.

6.3.2

The procedure has been socialized to worker and stakeholder. Based on interview with workers and community, stated that they already know how to submit if there is a complaint. Based on public complaint registration books it is known that during the period 2018 there were no complaints from external stakeholder, however based on interview with Teluk Bunian Hamlet there is a complaint related to broken bridge and trenches from Mid-2018, the CH has response that this proposal is still waiting approval from CEO Region. While from internal stakeholder there is some complaint related to housing condition. CH already show the improvement of the complaint consist of replacing the housing repair.

Status: Comply

6.4

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

6.4.1 and 6.4.2

Until the Re-Certification, there was no new expansion area of PT BNS, subsequently; there were no new land compensation process. Certificate Holder has had SOP of conflict resolution (006/BNS/MDF-PK/IX/12) which states that the personnel of Plantation Services Department is assigned to solve the land claim issue. PSD manager and the team will verify to collect the supporting data. The form of process of resolution is conducted in forum to achieve collective agreement. Socialization of SOP of conflict resolution was held in Parit Baru. It was attended by 11 representatives consisted of representatives of PT BNS, chief of village, community figure and other member of the community on August 30th 2008. The agenda of socialization describes the definition of SOP of conflict resolution and land compensation and the flow chart to Certificate Holder. There is also procedure to identify and calculate the compensation fairly for the loss of legal or traditional right as written on the SOP of the occupied land compensation (343/PSD-OKUP/11). Based on interview with village representative from Parit Gurah Baru, Teluk Bunian Village regarding to land compensation process, all compensation has been paid fairly. The compensation document saved by PSD Department as follows handover letter

by land owner, undisputed letter and minutes of land handover including photos. Until the audit, there was no complaint record regarding to it land.

6.4.3

There are also evidence of the records of identification of the compensated parties. For example:

- Letter of notification of the compensation (SKGR)
- Official record of the compensation between Certificate Holder and the community
- List of the land compensation payment and its content. The collective declaration letter that it is conducted voluntary and in healthy condition (mentally and physically).
- Receipt of personal payment attached with law seal, signature and fingerprint stamp and the photographs of payment.

Based on interview with PSD staff and document verification, land compensation document has set as restricted document due to sensitive cases.

There is no new compensation process since ASA-4. Certificate Holder has shown the example of the record of land compensation negotiation process at the early period. It was the process of compensation to construct canal network around Mandah Estate. The record is in form of the minutes of meeting of assembly on August 10th 2009 in the house of Mr Artawan in Parit Gurah Baru, Teluk Bunian Village who attended by 37 participants. The result of the agreement were:

- Agreement to construct access road by compensating land and plants belong to community impacted by the road construction project for \pm 10,000 meter.
- The community is willing to help the project.

Whole document of compensation progress written in Bahasa and well-understood by the land owner or villagers. In order to ensure the agreement are transparent and fairly enough, whole document of land handover area signed and witnessed by the government.

Status: Comply

6.5

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

6.5.1

Labour Agreement (PKB) of CH has refers to PKB Period 2015-2017 dated 18 June 2015 which formulated by BKS-PPS and PP.FSP.PP-SPSI. Process of PKB extension was still ongoing. Policy on wages/salary, overtime, insurance (BPJS), premium and bonus has included on the PKB. For minimum wages in 2019, the company will refers to applicable regulation. Based on document review and information from Manpower Agency of Indragiri Hilir Regency, it was known that The Company has implementing minimum wages for period 2018 as in accordance with Governor Decree. Backpay (*Rapel*) evidence for period 2018 in all estate and mill had been paid in June 2018. For minimum wages in 2019 as refers to Governor Decree No. Kpts.949/XI/2018 dated 21 November 2018, adjustment is expected to be conducted on May 2019. Based on the results of payroll document review and interviews with workers in PT BNS, it could be concluded that the company has implementing payroll in accordance with applicable regulations, and there is no breach of payment related to wages, as well as force the work. Payment of harvested wages is adjusted to the results of work, the achievement of tonnage targets and the provision of overtarget premiums if passed the target. However, based on review towards work agreement with replanting contractor, for example with PT Mitra Karya Jaya Perdana which presented in Contract No. 012/Replanting/BNS/2018 dated 29 June 2018, it was known that article mentioning minimum wages payment for contractor workers is not available. Hence, company management has no mechanism to ensure that all contractor workers are paid in accordance with applicable regulation. Raised **NCR No. 2019.08 with major category**.

6.5.2

Labour Agreement (PKB) of the company has refers to PKB Period 2015-2017 dated 18 June 2015 which formulated by "Badan Kerja Sama Perusahaan Perkebunan Sumatera" (BKS-PPS) and "Pengurus Pusat Federasi Serikat Pekerja Pertanian Dan Perkebunan Serikat Pekerja Seluruh Indonesia" (PP.FSP.PP-SPSI). Process of PKB extension was still ongoing. The PKB has covers regulation reference, company policy, work relationship, leave and permission, salary payment, welfare and insurance, business trip allowance, disciplinary, mutation, work termination, grievance and complaint and others. Regarding opportunity to become permanent worker in PT BNS, the company shows the program

of promotion in all units, as presented in several documents as follows:

- MDF Manager Letter No. 452/BNS-MDF/12/2018 dated 18 Desember 2018 about proposal of 18 workers recruitment to become permanent worker. The proposal has been agreed by the Head Plantation Operation (HPO) and Chief of Engineering on 06 February 2019 and 18 February 2019, respectively.
- Decree of promotion letter No. 01/Est-MDE/V/IX/2018 dated 17 September 2018 for harvester which has works for 2 years. This promotion has recorded on Manpower Agency of Indragiri Hilir through Letter No. 611/NAKERTRANS-INHIL/HISK/560 dated 18 October 2018.
- MDE Manager Letter No. 010/Pjs. Sr. EM-MDE/II/2019 dated 24 January 2019 about promotion proposal of 18 Harvester to become permanent workers. Among the prgress is shows for example through Decree of promotion Letter for Harvesters No. 01/EST-MDE/DIV. IV/III/2019 and No. 01/EST-MDE/DIV.II/II/2019 dated 01 March 2019.

According to explanantion above, estate maagement is encourage to monitor the progress of worker promotions (especially harvesters) from contract worker to become permanent worker. **OFI**.

6.5.3

Based on observation and interview with workers and hpusing complex occupants, it was known that renovation and/or maintenance of the existing housing as well as its facility were still on going and shows a positive progress. The same trend has also appointed to the development of permanent house for workers. However, based on observation and interview with Contractor CV Suryamax which in cooperation with MDF for Turbine maintenance, it was known that 11 contractor workers has lived in one barrack with only one bathroom (toilet), which provided by company. However, contract agreement Article 2 point 2.5 mentioned that Contractor is required to provide a proper living space (temporary barrack/house) to its workers. Company management stated that the work period has only less than one week. Nevertheless, company management is encourage to ensure that Contractor has provide a proper living place for their workers as mentioned in the work agreement. **OFI**.

6.5.4

Based on field observationto estate housing area in Mandah Estate, Rotan Semelur Estate and Teluk Bakau Estate, it was known that there were lots of store owned by occupants which sale household goods. Employees is also allows for fishing, but strictly prohibited for adopting electricity and poisoning menthod. Furthermore, there is a temporary market during salary payment day.

6.5.1 Status: NCR.No.2019.08 with Major category

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 and 6.6.2

Found in SOP Guidelines for Management of Sustainable Plantation No. Policy 724 / TQEM-SPMS / 09 dated 27/08/2010. Explained that the company is expected to respect the rights of all employees to form and join a community of Labour Unions in accordance with their choice and negotiate together. The implementation of the policy is the existence of Labour unions. Based on interviews with representative of Labour Union at the estate and factory revealed that unions were part of the Sumatera oil palm plantations Labour Union. The election of administrators was also carried out democratically without any intervention from the company. The results of interviews with workers are known that the union has been running in accordance with its purpose of conveying the aspirations of workers to the company

There is information about recording labour unions meeting including the following:

- RSE: it has been reported to the Department of Manpower and Transmigration, Indragiri Hilir No. 560 / DISNAKERTRANS-HISK / X / 2017/36 dated October 17, 2017 with the chairman of Zulmarwan Batubara; deputy chairman Fadil Wahyu; deputy chairman Saharuddin M, Secretary of Marizon; deputy secretary of Saiful Arif Nasuiton; and Treasurer Suherman
- MDF: registered with the Manpower and Transmigration Office of Indragiri Hilir No. 61 / NAKERTRANS-PKHI / 560 dated 18 March 2013 with the chairman: Ilyas, deputy: Mazelan, treasurer: Kasmadi. For the 2015-2020 period

- **Labour Union Minutes of Meeting**

- MDF : March 12, 2018 regarding 10,000 SPSI contribution deductions per month. 88 participants participated
- December 26, 2018 regarding the utilization of donation funds and employee bonus socialization was attended by 29 people
- MDE, MDF, RSE: March 13 and 14 2019. Discuss about harvesting and Non-Harvesting premi and discussion of contract workers to be submitted to permanent worker in stages

The meeting of the 13th and 14th of March 2019 was attended by representatives of employers (HRM HO Minamas Plantation, Estate Manager, and Kasie) and worker representatives (labour unions of each unit)

Status: Comply

6.7

Children are not employed or exploited.

6.7.1

CH has a policy on child labor, signed by CEO and in CLA also stated that the minimum age for workers is 18 years old. Based on document review of employee data till February 2018, there was no workers under 18 years old. The youngest workers is 19 years old. Based on public consultation with Manpower Agency of Indragiri Hilir District and labour union, there is no issue regarding child labor. Based on interview with worker in mill, they know the minimum age to work in the company. Based on field observation in estate and factory also showed did not any indication of children labor.

Status: Comply

6.8

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

6.8.1 and 6.8.2

CH policy towards non-discrimination and same opportunity was presented in policy No. 724/TQEM-SPMS/09 dated April 1st 2010 Point 1 which mentioned that all employees shall be treated equally and properly in term of recruiting, condition, self-improvement, race, tribes, gender, religion, physical appearance, sexual orientation, politic views, age, etc. Based on list of employees review, it was known that workers were consider plural, came from various races around Indonesia region, e.g. Jawa, Melayu, Batak, Sunda, Nias, etc. Furthermore, based on interview with workers in estate and factory it was stated that CH has treat all employees equally without any indication of discrimination. Furthermore to protect women rights, the company has provide Gender Committee in all estates and mill.

6.8.3

Recruitment for new workers is based on company needed. The selection for new recruitment is made based on procedure that owned. Based on interview and document review show that there is new recruitment year of 2018 from local people and other region. The selection for new workers consist of administration, medical check-up and field test.

Records of employee's medical history were saved by Administration Department (KTU). Moreover, policy towards works opportunity, promotion and employees self/capacity improvement were presented in Memorandum No. 331/HRM-i3/VII/2013 dated July 9th 2013. The promotion is made based on work performance. There are example appointment of permanent worker at MDF: Inter Office Mail number 457/BNS-MDF/12/2018 dated 18 December 2018 from MDF Manager to the Area Controller of Riau Selatan, concerning: proposal for appointment of 18 persons temporary worker from MDF. The letter was approved by Area Controller, Chief Engineering, and Chief Executive Officer dated 6 February 2019.

Status: Comply

6.9

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

6.9.1; 6.9.2 and 6.9.3.

Company policy towards gender, sexual harassment and reproductive protection was presented in Policy No. 724/TQEM-SPMS/09 dated August 27th 2010. The company also provide and support the existence of Gender Committee which available in estate and factory units. This is conformed during interview with Gender Committee member in factory & estates. It also stated that there were no case related to sexual harassment and related gender discrimination in PT BNS operational areas.

Mechanism of grievances towards gender problem was presented in document No. 701/TQEM-ESH/10 Point 6.4, which describe that all grievance were noted in Form of Grievance and delivered to Gender Committee and Manager. However,

the problem is more priority to be solved in family meeting situation before continued into laws step. Investigation will be carried out by gender committee and reported to the manager. Sanction or punishment will be given to the doer (harassment and insulting actor, etc.). Based on interview with pesticide applicators (Female workers) they have been know related mechanism of grievances and they get H1 leave and can rest for 2 days without wage deductions.

Status: Comply

6.10

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

6.10.1 and 6.10.2

Mandah Factory only receives FFB from their own estates and no third party supplier entering the mill. Therefore, current and past prices paid for Fresh Fruit Bunches (FFB) are not applicable.

6.10.3 and 6.10.4

Related to involvement of local business, the CH provide the evidence of contractual agreement for Replanting activities and kernel packing and loading. CH make an agreement with local contractor PT Mitra Karya Jaya Perdana for several activities such as felling palm, stacking and chipping inland areas. Therefore there are agreement between MDF with SPTSI (*Serikat Pekerja Transport Seluruh Indonesia*) from Bente Village number MDF/SPK-LKL/XI/2012/002 dated 15 November 2012 until now. Based on document review and interview with thus contractors show that the payment is accordance with agreement.

Status: Comply

6.11

Growers and millers contribute to local sustainable development wherever appropriate.

6.11.1

The priority local needs is an access through the plantation canal. Therefore, based on interview with Teluk Bunian village, contributions to local development is access to outside area and Fire Monitoring Team. This program already implemented by the company based on consultation with affected stakeholders. For example: shuttle boat for children, sluice maintenance, and others.

6.11.2

The CH does not have scheme smallholders.

Status: Comply

6.12

No forms of forced or trafficked labour are used.

6.12.1

Every worker has work agreement which in accordance with actual position of workers, without any substitution. This is conformed during interview with Manpower Agency of Indragiri Hilir Regency. Based on list of employee for period 2019 review, it could be concluded that there were no illegal and foreign workers. Most of the workers were Indonesians with majority locals from surrounding estate areas. Furthermore, based on interview with workers in Mandah Factory, Mandah Estate and Rotan Semelur Estate, it was known that the company has fulfill workers rights such as salary which was in accordance with minimum payment regulation (in 2018), accident insurance (BPJS) for manpower and health, as well as premium payment as mentioned in work agreement.

6.12.2

Based on work agreement review and interview with Labour Union representatives, Mandah Factory Operators, as well as Harvesters, Fertilizer Applicators and Pesticide Applicators in Mandah Estate and Rotan Semelur Estate, it was known that recruitment is conducted by the company autonomously and there is no substitution or contradictive of works againsts contract agreement. As additional information from Manpower Agency of Indragiri Hilir Regency, it was stated that since 2019 there is no more inter-regional work force (or Akad) workers in PT BNS.

6.12.3

Policy on migrant worker and/or expatriate recruitment is presented in procedure No. 371/ADM-PTA/08 dated 13 March 2008 and for Akad worker is presented in procedure No. 412/SKU-AKAD/GRAS dated 16 September 2015. However, based on list of employees in Mandah Factory, Mandah Estate and Rotan Semelur Estate in 2019, it was known that there were no migrant worker and/or expatriate in company operational areas. Based on interview with Manpower Agency of Indragiri

Hilir Regency, it was informed that since 2019 there is no more inter-regional work force (or Akad) workers in PT BNS.		
	Status: Comply	
6.13		
Growers and millers respect human rights		
6.13.1		
Company Policy on human right is presented in document No. ST/MDE/VIII/2015 dated 05 August 2015 issued by Head of SOU 20 of PT BNS. The policy has in line with the Act No. 39 in 1999. Human rights in CH perspective has covers employees prosperity, freedom in religion implementation, non-discriminative treatment towards gender, ethnic and social background, opportunity of self improvement, transparency of information, etc. socialization of policy had been conducted to worker and contractor representatives annually. Based on interview with government agencies of Indragiri Hilir Regency, community representatives from Village of Teluk Bunian Dusun parit Gurah, as well as workers in Mill and Estates, it was known that there are no negative issues related to human rights in company operational areas.		
	Status: Comply	
PRINCIPLE #7 Responsible development of new plantings		
7.1		
A comprehensive and participatory independent social and environmental assessment is undertaken prior to establishing new plantings or operations, or expanding existing ones, and the results incorporated into planning, management and operations.		
7.1.1; 7.1.2; 7.1.3; 7.1.4 and 7.1.5.		
Certificate Holder does not conducted new planting after 2010. The planting was conducted during period of 1996 to 2007. The replanting was started at 2013 in RSE and at 2015 in MDE. Total replanting planned for 4.111 Ha in RSE and planned for period of 2013 – 2035. Meanwhile for MDE is planned for 4.107 Ha during period of 2015 -2019.		
	Status: Comply	
7.2		
Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.		
7.2.1 and 7.2.2		
Based on document review it is known that there has been no new land clearing since November 2005 and the company has a commitment not to expand the working area from the existing ones.		
	Status: Comply	
7.3		
New plantings since November 2005, have not replaced primary forest or any area required to maintain or enhance one or more High Conservation Values.		
7.3.1; 7.3.2; 7.3.3; 7.3.4 and 7.3.5.		
The company shows RaCP of PT BNS process with the following details:		
<ul style="list-style-type: none"> • Liability and disclosure to RSPO on December 2nd, 2014. • LUCA was sent on December 12th, 2017 and shape files submission to RSPO on August 27th, 2018. 		
Rotan Semelur Estate:		
<ul style="list-style-type: none"> - Time of clearance Nov 05 - Nov 07 (Ha) covering an area of 135.15 Ha. - Time of clearance Dec 07 - Dec 09 (Ha) covering an area of 18.12 Ha. 		
<ul style="list-style-type: none"> • Concept notes was sent to RSPO on March 25th, 2016 and responded on December 5th, 2016. • RSPO Compensation panel dated November 12th, 2017, states that the RaCP is still in process. 		
Based on communication between PT Mutuagung Lestari and RSPO February 13 th , 2019, information was obtained that "A preliminary review of the compensation plan has been done. However, no further action can be taken because the LUCA is still awaiting finalization and its pending clarification from Sime Darby ". In this regard, the company has not been able to show that the RaCP compensation plan has been approved by the RSPO.		
The company has not been able to show evidence that the RaCP compensation plan has been approved by the RSPO. It's become NCR No.2019.09 with Major category.		

7.3.1	Status: NCR No.2019.09 with Major category.	
7.4	Extensive planting on steep terrain, and/or on marginal and fragile soils, is avoided.	
7.4.1 and 7.4.2	Based on document review it is known that there has been no new land clearing since November 2005 and the company has a commitment not to expand the working area from the existing ones.	
	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.	Certificate Holder does not conducted new planting after 2010. The planting was conducted during period of 1996 to 2007. The replanting was started at 2013 in RSE and at 2015 in MDE. Total replanting planned for 4.111 Ha in RSE and planned for period of 2013 – 2035. Meanwhile for MDE is planned for 4.107 Ha during period of 2015 -2019.	
	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	The company does not conducted new planting after 2010. Planting was conducted during period of 1996 to 2007. Meanwhile, during the audit of Re-Certification there is replanting activity that was started at 2013 in RSE and at 2015 in MDE.	
	Status: Comply	
7.7	Use of fire in the preparation of new plantings is avoided other than in specific situations, as identified in the ASEAN guidelines or other regional best practice.	
7.7.1 and 7.7.2	Based on document review it is known that there has been no new land clearing since November 2005 and the company has a commitment not to expand the working area from the existing ones.	
	Status: Comply	
7.8	New plantation developments are designed to minimise net greenhouse gas emissions.	
7.8.1 and 7.8.2.	The company does not conducted new planting after 2010. The planting was conducted during period of 1996 to 2007. The replanting was started at 2013 in RSE and at 2015 in MDE. Total replanting planned for 4.111 Ha in RSE and planned for period of 2013 – 2035. Meanwhile for MDE is planned for 4.107 Ha during period of 2015 -2019.	
	Status: Comply	
PRINCIPLE #8 Commitment to continuous improvement in key areas of activity		
8.1	Growers and millers regularly monitor and review their activities and develop and implement action plans that allow demonstrable continuous improvement in key operations.	
The Company has conducted internal audit RSPO on 8 March 2019, there are several non-conformities. For example: regarding RKL/RPL reported. All NC's has been reviewed and closed on 9 March 2019.		
Environment. The company have complete equipment for Fire extinguisher.		
Social: The company have realized CSR program every year.		

Worker Welfare:

The company has appointed permanent worker from nonpermanent workers as gradually since January 2019.

Status: Comply

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

Clause	Requirement
5.1	Applicability of the general chain of custody requirements for the supply chain
5.1.1	<p>The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. After the end product manufacturer, there is no further requirement for certification.</p> <p>The Facility were show agreement of physical handling of RSPO Certified product. There are three CSPO transporters and two CSPK transporters during last year. CSPO transporters: PT Trans Samudera Mandiri, PT Mitsi Citra Mandiri, PT Pelayaran KJ Marine. CSPK transporters: PT Pelayaran Sinar Pagoda and PT Transindo Bahari Perkasa, Lampung.</p> <p>Status: Comply</p>
5.1.2	<p>Traders and distributors require a license obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model.</p> <p>Facility only processed their own FFB from Mandah Estate and Rotan Semelur Estate.</p> <p>Status: Comply</p>
5.1.3	<p>Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform.</p> <p>PT Bhumireksa Nusasejati, subsidiary of Sime Darby Plantation Berhad has registered in RSPO membership 1-0008-04-000-00 since 8 September 2004</p> <p>Mandah Factory has been registered in IT platform palm trace RSPO https://palmtrace.rspo.org/web/rspo/member-directory which information as follows:</p> <ul style="list-style-type: none"> • Member Name: PT. Bhumireksa Nusasejati • Account UID: RSPO_AC1000001410 • Core Product: Palm Oil • Member ID: RSPO_PO100001381 • Member Category: Oil Mill <p>Status: Comply</p>
5.1.4	<p>Processing aids do not need to be included within an organization's scope of certification.</p> <p>Facility has not using processing aids.</p> <p>Status: Comply</p>
5.2	Supply chain model
5.2.1	<p>The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.</p> <p>Facility has applied Identity Preserved (Module D) for CPO mill.</p> <p>Status: Comply</p>
5.2.2	<p>The site can use one (1) or a combination of supply chain models as audited and certified by the CB.</p>

Facility only applied Identity Preserved (Module D) for CPO mill.	
	Status: Comply
5.3	Documented procedures
5.3.1 The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified.	
Mandah POM have an update procedures of RSPO SCCS Certification Standard number SCCS-Std/RSPO/PSQM/02 dated 2 January 2018. According to point 5, the people in charge of the supply chain system are: <ul style="list-style-type: none"> - Factory Manager: the mill manager is responsible for maintaining and storing all documents, records and notes of the raw material usage; verification of the product status to the vendee; holding proper SCCS training. - Assistant of PSQM: checking the FFB quality and the raw materials as well as monitoring the product delivery and load/unload. - Foreman/assistant of Lab: analyzing and testing the quality; maintaining and distributing the result of product and raw material analysis and test. - Assistant/Senior assistant/Manager of Bulking: Ensuring the transport of CPO and PK product from POM to bulking. - Production clerk: recording the administration of the receipt certified FFB and the non-certified one. 	
	Status: Comply
5.3.2 The site shall have a written procedure to conduct annual internal audit	
The Company has shown evidence of SOP Supply Chain improvement (027 / BNS-SCCS / 12) where clause 8.8 states that the supply chain of the supply chain shall be a minimum of 2 month before external audit. that covering the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents including assessment of it effectively. Internal audit will be conducted two month before external audit visit every year. The latest SCCS Internal Audit was conducted on 18 January 2019, there are 8 nonconformities. And it has been follow up by management unit.	
	Status: Comply
5.4	Purchasing and goods in
5.4.1 The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier	
Based on document verification and interview with PSQM staff who take responsibility for all CSPO and CSPK sales, all purchasing and goods in has been in compliance with the following minimum information for RSPO certified products is made available by the supplier. Entire information regarding to name and address of buyer, name and address of seller, loading shipment/delivery date, date of document issued, supply chain model used, quantity, unique identification number, RSPO IT platform per shipment has been written in monthly report of Mandah Factory.	
	Status: comply
5.4.2 The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents	
Facility does not buy oil palm product from other.	
	Status: comply
5.5	Outsourcing activities
5.5.1 In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mill cannot outsource processing activities like refining or crushing.	

The Facility were show agreement of physical handling of RSPO Certified product. There are three CSPO transporters and two CSPK transporters during last year. CSPO transporters: PT Trans Samudera Mandiri, PT Mitsi Citra Mandiri, PT Pelayaran KJ Marine. CSPK transporters: PT Pelayaran Sinar Pagoda and PT Transindo Bahari Perkasa, Lampung.

Status: Comply

5.5.2

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

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

Based on document verification sighted that all RSPO Certified products transport are using third parties, such as: PT Trans Samudera Mandiri, PT Sinar Pagoda Services, PT Transindo Bahari Perkasa, PT Mitsi Citra Mandiri, and PT Pelayaran KJ Marine. There were an agreement dated 7 May 2018 stating that PT Trans Samudera Mandiri & PT Mitsi Citra Mandiri were willing to be accessed by the Certification Body related to the implementation of RSPO standards. However, The company has not been able to show evidences that all third parties who handling the RSPO Certified products are willing to be accessible by the RSPO Certification Body. **It was raised as nonconformity No 2019.10.**

Status: NCR No 2019.10 with Major Category

5.5.3

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

The facility has record names and contact detail of all contractors, as follows:

No	Name	Addressed & PIC	Contract Number	Marks
1	PT Trans Samudera Mandiri	Jl Tentara Pelajar, Perkantoran Permata Senayan Block E-22, Patal Senayan, Jakarta Selatan 12210 (021 – 5794896465)	021-29562338	CSPO transporter
2	PT Pelayaran Sinar Pagoda	Jl Tiang Bendera II No 92 Jakarta	021-6911872	CSPK transporter
3	PT Transindo Bahari Perkasa, Lampung	Jl Yos Sudarso No 88, Bandar Lampung 35241	0721-341451	CSPK transporter
4	PT Mitsi Citra Mandiri	Jl Raya Pelabuhan II St. No 10 Belawan	061-6943333	CSPO transporter
5	PT Pelayaran KJ Marine	Jl Bisma Raya Block C2 No 1 kel. Papanggo Tanjung Priok, Jakarta Utara	021-29562338	CSPO transporter

Status: Comply

5.5.4

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

The facility has inform to the CB regarding to names and contact details of all contractor as above indicator (Clause 5.5.3).

Status: comply

5.6

Sales and goods out

5.6.1

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

Whole transaction of CSPO and CSPK has been recorded in RSPO IT Platform, including Shipping Announcements / Announcements and Confirmations.

CSPO sales period of March 2018 to February 2019

Transaction ID	Buyer	Product	Program	Volume*	Transaction Type	Status	Shipping/BL Date
TR-482e08e3-d577	PT Golden Hope Nusantara	CSPO	IP	2,195.96	Shipping	Confirmed	18-12-2018
TR-2d83c22d-8606	PT Golden Hope Nusantara	CSPO	IP	1,446.45	Shipping	Confirmed	14-10-2018
TR-9889dfba-2db6	PT Golden Hope Nusantara	CSPO	IP	1,699.57	Shipping	Confirmed	1/7/2018
TR-f491e32d-a958	PT Golden Hope Nusantara	CSPO	IP	1,985.62	Shipping	Confirmed	30-03-2018
TR-75f3ddda-811e	PT Golden Hope Nusantara	CSPO	IP	1,693.13	Shipping	Confirmed	12/5/2018
TR-3a7e91c2-5d5d	PT Golden Hope Nusantara	CSPO	IP	1,507.75	Shipping	Confirmed	6/3/2018
Total				10,528.48			

CSPK sales period of March 2018 to February 2019

Transaction ID	Buyer	Product	Program	Volume*	Transaction Type	Status	Shipping/BL Date
TR-9ad6960c-e123	PT IVO MAS TUNGGAL - Lubuk Gaung	CSPK	IP	375.83	Shipping	Confirmed	11/11/2018
TR-43419cec-bb8a	PT. Adei Plantation & Industry Mandau Kernel Crushing Plant	CSPK	IP	241.5	Shipping	Confirmed	18-09-2018
Total				617.33			

Status: comply

5.7 Registration of transactions

5.7.1

Supply chain actors who:

are mills, traders, crushers and refineries; and

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

PT Bhumireksa Nusasejati, subsidiary of Sime Darby Plantation Berhad has registered in RSPO membership 1-0008-04-000-00 since 8 September 2004

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

- Member Name: PT. Bhumireksa Nusasejati
- Account UID: RSPO_AC1000001410
- Core Product: Palm Oil
- Member ID: RSPO_PO100001381
- Member Category: Oil Mill

Status: comply

5.7.2

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

- Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures.

- Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually.
- Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.
- Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.

The Mandah POM shows several records of transactions in the RSPO Palm Trace for the period of March 2018 until February 2019 as follows:

Products	Shipping Announcement (MT)	Remove (MT)	Credit Allocations (MT)	Remaining Volume (MT)
CSPO	9,798.98		13,400	76.02
CSPK	2,734.82		0	2,325.18

While based on the balance sheet data/record keeping with the same period, there are sales as follows:

Products	Claim RSPO (MT)	Conventional (MT)
CSPO	9,008.93	9,812.52
CSPK	617.33	3,366.56

Based on above data, there are variance data between palm trace and record keeping on MDF. However, the Mandah POM has not been able to show the regularly CSPO & CSPK transaction has been registered on the palm trace. **It was raised as nonconformity No 2019.11.**

Status: NCR No 2019.11 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

The organization has annual SCCS training plan, the latest SCCS training has been conducted on 19 February 2019 to the 11 key persons. Based on interview with security and weighbridge operators sighted that they can explain about RSPO SCCS.

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 organization has annual SCCS training plan, the latest SCCS training has been conducted on 19 February 2019 to the 11 key persons. Based on interview with security and weighbridge operators sighted that they can explain about RSPO SCCS.

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 Mandah POM shows several records of transactions in the RSPO Palm Trace for the period of March 2018 until February 2019 as follows:

Products	Shipping Announcement (MT)	Remove (MT)	Credit Allocations (MT)	Remaining Volume (MT)
CSPO	9,798.98		13,400	76.02
CSPK	2,734.82		0	2,325.18

While based on the balance sheet data/record keeping with the same period, there are sales as follows:

Products	Claim RSPO (MT)	Conventional (MT)
CSPO	9,008.93	9,812.52
CSPK	617.33	3,366.56

Based on above data, there are variance data between palm trace and record keeping on MDF. However the Mandah POM has not been able to show evidence that it has maintained up to date data, both data in palm trace and actually in the MDF. **It was raised as nonconformity No 2019.12.**

Status: NCR No 2019.12 with Major Category

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 Company has shown evidence of SOP Supply Chain improvement (027 / BNS-SCCS / 12) where clause 8.8 states that the supply chain of the supply chain shall be a minimum of 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.

Facility estimated their palm product which is written in annex of ASA-4 certificate (FFB: 101,195 MT; CSPO quota: 23,275 MT; CSPK quota: 5,060 MT) and monitored in three-monthly bases. If any overproduction, facility will inform the CB to extend their volume.

The actual production FFB's, CSPO and CSPK during 12 month period on below table:

CSPO produced period of March 2018 to February 2019

Month	Production (MT)
March 2018	1,579.57
April 2018	1,439.61
May 2018	1,730.24
June 2018	1,286.45
July 2018	2,372.11
August 2018	2,057.72
September 2018	2,173.71
October 2018	1,981.83
November 2018	1,644.00
December 2018	1,801.37
January 2019	1,812.16
February 2019	1,550.61
Total	21,429.37

CSPK produced period of March 2018 to February 2019

Month	Production (MT)
March 2018	359.52
April 2018	318.21
May 2018	383.79
June 2018	288.68
July 2018	542.96
August 2018	463.58
September 2018	523.37
October 2018	486.89
November 2018	410.62
December 2018	447.50
January 2019	443.74
February 2019	387.82
Total	5,056.68

Based on above data sighted that actual production are not over than last year certificate quotas.	
	Status: comply
5.10	Conversion factors
5.10.1 Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org); RSPO Rules for Physical Transition of Oleochemicals and its Derivatives. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries	
Facility did not using conversion rate.	
	Status: comply
5.10.2 Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	
Facility did not using conversion rate.	
	Status: comply
5.11	Claims
5.11.1 The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.	
Facility did not using RSPO trademark during communication with stakeholder / customer.	
	Status: comply
5.12	Complaints
5.12.1 The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	
Facility has had documented procedures for stakeholders complaints in chapter 4.11 (Complaint).	
	Status: comply
5.13	Management review
5.13.1 The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken	
Management review of RSPO SCCS implementation has been conducted on 16 February 2019.	
	Status: comply
5.13.2 The input to management review shall include information on: <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard. • Customer feedback. • Status of preventive and corrective actions. • Follow-up actions from management reviews. • Changes that could affect the management system. • Recommendations for improvement. 	
Management review has covering result of internal audits on 18 January 2019, there are no complaint/feedback from buyer related to quality of RSPO Certified Products. The follow up actions from management reviews was conducted, such as: transaction record has sent to MDF from Marketing Department in Jakarta.	
	Status: comply

5.13.3

The output from the management review shall include any decisions and actions related to:

- Improvement of the effectiveness of the management system and its processes.
- Resource needs.

The output from the management review were included improvement of the effectiveness by the management system and its processes and resources.

Status: comply

3.2.2 (Module D) CPO Mills – Identity Preserved Requirements

Clause	Requirement												
D1	Definition												
D.1.1													
A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from its own supply base certified to the RSPO Principles and Criteria (RSPO P&C). Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. If a mill processes certified and uncertified FFB without physically separating the material then only Module E is applicable.													
PT. Bhumireksa Nusasejati has own 2 mill named Teluk Bakau Factory and Mandah Factory. Both of mill using Identity Preserved module where only received FFB from his own area that has RSPO certified. Mandah Factory itself received FFB from his certified scope (Mandah Estate and Rotan Semelur Estate) or in case of trouble in Teluk Bakau Factory, Mandah Factory also received FFB from Teluk Bakau, Nusa Lestari Estate and Nusa Perkasa Estate.													
	Status: Comply												
D.2	Explanation												
D.2.1													
The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the CB in the public summary of the P&C certification report. This figure represents the total volume of certified palm oil product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced should then be recorded in each subsequent annual surveillance report.													
Based on the estimated FFB, CPO and PK on annex 1 of ASA-4 certificate, facility could be produce as follows:													
	<table><tr><th>Product</th><th>Estimation of Certified Product (ASA-4)</th><th>Actual Production 12 month before audit</th><th>Estimation of Certified Product next 12 month</th></tr><tr><td>CPO</td><td>23,275</td><td>21,429.37</td><td>19,536</td></tr><tr><td>PK</td><td>5,060</td><td>5,056.68</td><td>4,417</td></tr></table>	Product	Estimation of Certified Product (ASA-4)	Actual Production 12 month before audit	Estimation of Certified Product next 12 month	CPO	23,275	21,429.37	19,536	PK	5,060	5,056.68	4,417
Product	Estimation of Certified Product (ASA-4)	Actual Production 12 month before audit	Estimation of Certified Product next 12 month										
CPO	23,275	21,429.37	19,536										
PK	5,060	5,056.68	4,417										
	Status: Comply												
D.2.2													
The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).													
Mandah Factory has been registered in IT platform palm trace RSPO https://palmtrace.rspo.org/web/rspo/member-directory which information as follows:													
<ul style="list-style-type: none">Member Name: PT Bhumireksa Nusasejati.Account UID: RSPO_AC1000001410.Core Product: Palm Oil.Member ID: RSPO_PO100001381.Member Category: Oil Mill.													
	Status: Comply												
D.3	Documented procedures												
D.3.1													
The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:													
<ul style="list-style-type: none">Complete and up to date procedures covering the implementation of all the elements in these requirements;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.

Mandah POM have an update procedures of RSPO SCCS Certification Standard number SCCS-Std/RSPO/PSQM/02 dated 2 January 2018.

According to point 5, the people in charge of the supply chain system are:

- Factory Manager: the mill manager is responsible for maintaining and storing all documents, records and notes of the raw material usage; verification of the product status to the vendee; holding proper SCCS training.
- Assistant of PSQM: checking the FFB quality and the raw materials as well as monitoring the product delivery and load/unload.
- Foreman/assistant of Lab: analyzing and testing the quality; maintaining and distributing the result of product and raw material analysis and test.
- Assistant/Senior assistant/Manager of Bulking: Ensuring the transport of CPO and PK product from POM to bulking.
- Production clerk: recording the administration of the receipt certified FFB and the non-certified one.

Status: Comply

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

As explained in previous indicator, facility has had the supply chain procedure since 2 January 2018.

Based on field observation in mill and interview with related officer known that they has been understand regarding to supply chain implementation. For example they can demonstrated how to verify incoming FFB according to it procedure, stamp the weight station ticket etc.

Status: Comply

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

Certified and non-certified FFB received 12 month before audit

Month	FFB (Ton)		
	RSPO Certified	Non Certified	Total
March 2018	6,792.98	-	6,792.98
April 2018	6,424.62	-	6,424.62
May 2018	7,675.12	-	7,675.12
June 2018	5,904.74	-	5,904.74
July 2018	10,726.62	-	10,726.62
August 2018	9,084.61	-	9,084.61
September 2018	10,183.34	-	10,183.34
October 2018	9,025.30	-	9,025.30
November 2018	7,846.29	-	7,846.29
December 2018	8,552.16	-	8,552.16
January 2019	8,280.83	-	8,280.83
February 2019	6,625.17	-	6,625.17
Total	97,121.78	-	97,121.78

There is no non-certified FFB received during ASA-4 to this assessment.

Status: Comply

D.4.2
The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.

Mandah Factory has had procedure for SCCS that describes the provision of information to CB if there is excess production of RSPO-certified products. Based on the estimated FFB, CPO and PK on annex 1 of ASA-4 certificate, facility could be produce as follows:

Product	Estimation of Certified Product (ASA-4)	Actual Production 12 month before audit
FFB	101,195	97,121.78
CPO	23,275	21,429.37
PK	5,060	5,056.68

During the audit activity on March 15, 2019. The management unit was showed an email requesting the addition of CSPO & CSPK quotas to the Certification Body. However, the company to be consider to evaluate reported mechanism. (OFI)

Status: Comply

D.5 Record keeping

D.5.1

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

Mandah Factory has recorded the entire RSPO certified FFB which enter the mill and deliveries of RSPO certified product (CSPO and CSPK). Delivery of RSPO certified product with three-monthly basis recorded in the table below.

CSPO Produced and Dispatch data period 1 March 2018 to 28 February 2019

No	Period	CPO Production (Ton)			Dispatch CPO (Ton)		
		Cert	Non-Certified	Total	RSPO	Non-Certified	Other Scheme
1	March 2018	1,579.57	-	1,579.57	1,985.62	-	-
2	April 2018	1,439.61	-	1,439.61	1,693.82	-	-
3	May 2018	1,730.24	-	1,730.24	-	-	-
4	June 2018	1,286.45	-	1,286.45	1,687.07	-	-
5	July 2018	2,372.11	-	2,372.11	-	1,214.07	-
6	August 2018	2,057.72	-	2,057.72	1,446.46	-	-
7	September 2018	2,173.71	-	2,173.71	-	2,468.73	-
8	October 2018	1,981.83	-	1,981.83	-	2,174.30	-
9	November 2018	1,644.00	-	1,644.00	2,195.96	-	-
10	December 2018	1,801.37	-	1,801.37	-	1,986.25	-
11	January 2019	1,812.16	-	1,812.16	-	1,494.73	-
12	February 2019	1,550.61	-	1,550.61	-	-	-
Total		21,429.37		21,429.37	9,008.93	9,338.07	-

CSPK Produced and Dispatch data period 1 March 2018 to 28 February 2019

No	Period	PK Production (Ton)			Dispatch PK (Ton)		
		Cert	Non-Certified	Total	RSPO	Non-Certified	Other Scheme
1	March 2018	359.52	-	359.52	-	421.71	-
2	April 2018	318.21	-	318.21	-	432.12	-
3	May 2018	383.79	-	383.79	-	373.55	-
4	June 2018	288.68	-	288.68	393.38	-	-
5	July 2018	542.96	-	542.96	385.47	-	-
6	August 2018	463.58	-	463.58	391.76	-	-
7	September 2018	523.37	-	523.37	552.02	-	-
8	October 2018	486.89	-	486.89	389.02	-	-
9	November 2018	410.62	-	410.62	-	375.83	-
10	December 2018	447.50	-	447.50	372.27	-	-
11	January 2019	443.74	-	443.74	377.59	-	-
12	February 2019	387.82	-	387.82	505.06	-	-
Total		5,056.68	-	5,056.68	3,366.56	1,603.21	-

There are variance data, between palm trace and record keeping. It has been raised as nonconformity on the General COC clause 5.9.1.

Status: Comply

D.6 Processing

D.6.1	
The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept segregated from non-certified material including during transport and storage	
Mandah Factory, PT Bhumireksa Nusasejati only processes FFB from RSPO certified estate, subsequently, the entire product is CSPO and CSPK.	
	Status: Comply
D.6.2	
The objective is for 100 % segregated material to be reached	
Mandah Factory only processes FFB from RSPO certified estate.	
	Status: Comply

3.3. Conformity Checklist of Certificate and Logo Use

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

3.4. Summary of RSPO Partial Certification.

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

Sime Darby Plantation Berhad Time Bound Plan is explained in table section 1.10. Sime Darby has achieved 34 management units in Malaysia and 24 Management Units in Indonesia that RSPO certified. Total management unit in Sime Darby Plantation Berhad are 34 in Malaysia, 25 in Indonesia and 1 in Liberia. Sime Darby Plantation Berhad has informed the Time Bound Plan progress through representative's office in Indonesia. MUTU has considered that Sime Darby Plantation Berhad is comply with the RSPO requirement for Time Bound Plan. The Time Bound Plan was revised and declared by the Sime Darby Plantation Berhad Indonesian representative on June 16th, 2016 by the Head of PSQM.

MUTU has verified partial certification for un-certified unit's subsidiary of Sime Darby Plantation Berhad based on their Time Bound Plan. MUTU Auditor verified positive assurance against the company internal audit and supporting evidence as well as any information from others sources.

MUTU Auditor has verified company partial certification and concludes that:

- There are significant land conflicts in PT Mitra Austral Sejahtera, there is still an issue that remain unresolved social i.e. from Serikat Petani Kelapa Sawit (SPKS), but improvements are ongoing.
- PT Budidaya Agro Lestari waiting for land title process.
- The company has follow RSPO requirement related to New Planting Procedure and Remediation and Compensation Procedure.
- There is no labour disputes that are not being resolved through an agreed process
- All plantations established since 2005 have been done so in accordance with the applicable laws of the country and that there is no evidence of non-compliance with law in any of the non-certified holdings which has not been declared above

2.1 Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.2.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p>Company Group/Holding Statement: Companies are already doing internal audits. There are internal audit reports for each company.</p> <p>Auditor Verification: Internal Audit report available for uncertified management unit for example PT Sandika Natapalma – Karya Palma Estate on 10 February 2017.</p>
i.	<p>No replacement after dates defined in NIs Criterion 7.3 of:</p> <ul style="list-style-type: none"> • Primary forest. • Any area identified as containing High Conservation Values (HCVs). • Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3. 	<p>Company Group/Holding Statement: HCV assessment has been conducted for uncertified units i.e. PT Mitra Austral Sejahtera (by Aksenta in March 2009) and Sime Darby Plantation Liberia operations (by RSPO approved assessors – Dr SK Yap in 2011).</p> <p>Auditor Verification: Sime Darby Plantation Berhad sent disclosure of liability including LUCA analysis to RSPO Secretariat on 2 December 2014 and 2nd revision on 24 June 2016. The companies ensuring</p>

		reporting of disclosure of liability progress to RSPO and according to the CB's correspondence with RSPO Remediation and Compensation.
i.	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>Company Group/Holding Statement: A new mill will be set up in Liberia and planned for commissioning in February 2016. Preparation to undergo the RSPO Certification process is in progress and SDP targets to undergo RSPO Certification by end 2017. RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps is in progress. *Note: RSPO NPP Announcements for SDP can be found at http://www.rspo.org/certification/new-planting-procedures/public-consultations/page/14</p> <p>Auditor Verification:</p> <ul style="list-style-type: none"> • Karya Palma Estate (PT Sandika Natapalma) and Baturus Estate (PT Budidaya Agro Lestari) any new planting after January 1st 2010 and due to not conduct NPP. • RSPO NPP process has been completed in 2011 for a new mill in Liberia.
ii.	Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	<p>Company Group/Holding Statement: Sime Darby (Liberia) Plantation Inc. Status: Box G - Close for Monitoring Further details please refer to: http://www.rspo.org/members/complaints/status-of-complaints/view/46 PT Mitra Austral Sejahtera (Sime Darby Berhad) Further details please refer to: http://www.rspo.org/members/complaints/status-of-complaints/view/29</p> <p>Auditor Verification: Auditor has verified the supporting evidence of above the company statement. There are land conflict in :</p> <ul style="list-style-type: none"> • PT Mitra Austral Sejahtera, this issue are remain being resolved with RSPO dispute settlement facilities • PT Bina Sains Cemerlang, this issue was raise on 22 April 2017 and still being process to resolve.
iii.	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	<p>Company Group/Holding Statement: No stakeholder comments or complaints received.</p> <p>Auditor Verification:</p>

		Auditor has verified the supporting evidence of above the company statement. There are no labour dispute in company unit.
iv.	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	<p><i>Company Group/Holding Statement:</i> None noted. No stakeholder comments or complaints received.</p> <p><i>Auditor Verification:</i> Auditor has verified the supporting evidence of above the company statement. There is any legal non-compliance for company under SDP waiting for land title process, ie:</p> <ul style="list-style-type: none"> • PT Sime Indo Agro 1,652 Ha • PT Aneka Inti Persada 421.31 Ha • PT Bina Sains Cemerlang 308.25 Ha • PT Bersama Sejahtera Sakti 765 Ha • PT Langgeng Muaramakmur 1,162 Ha • PT Paripurna Swakarsa 1,120 Ha • PT Swadaya Andika 63 Ha • PT Bahari Gembira Ria 1,639 Ha • PT Guthrie Pecconina Indonesia 4,133 Ha • PT Perkasa Subur Sakti 1,286 Ha

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-4

NCR No.	:	2017.4.	Issued by	:	Trismadi Nurbayuto/Yudhi Yuniarto
Date Issued	:	9 March 2018	Time Limit	:	8 May 2018
NC Grade	:	Minor raised to Major	Date of Closing	:	7 March 2018
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): Based on field observations in spraying activities of Division 1, Block D029 RSE; harvesting activities in Division 1 E035 RSE. As well as the results of field observations in the activities of 5th Division harvest, Block H021 MDE and spraying activities Division 2, Block G018. Known that the foreman carries a first aid kit, however the contents of the first aid box are not in accordance with Permenakertrans No. 15 of 2008.					
Root Cause Analysis (filled by organization audited): Completeness of the item (medicine) is still in procurement from the central clinic. Root Cause Analysis on ASA-4 <ul style="list-style-type: none">- Supervision is not careful when receiving the first aid kit from the Nurse- There is an error of supervision in updating the monitoring book of the use of First Aid Box.					
Correction (filled by organization audited): Shows evidence of procurement of contents of first aid box in accordance with Permenakertrans No. 15 of 2008, and the proof of acceptance to the foreman. Correction on ASA-4 <ul style="list-style-type: none">- Recharge every box of First Aid and make sure it matches the amount in the monitoring book- Any items in the first aid kit carried by supervision to the field are not expired.					
Corrective Action (filled by organization audited): Provide stock of first aid box contents that are often used to avoid void stock in the clinic. Corrective Action on ASA-4 Establish the mechanism of managing First Aid Kit with number 01 / BNS / Clinic Sentral / TBE / III / 2018.					
Assessor Evaluation and Conclusion (filled by auditor): Verification on March 7, 2018 Based on field observations on operational activities related to first aid box found the fact that: <ul style="list-style-type: none">- Fertilizer activity in Block G22 Division 2 MDE, item incomplete (10 items) and there is 1 item that has expired.- Harvest activity in Block G21 Division 2 MDE, incomplete item (10 items).- Incomplete items e.g in Workshop (14 items), Warehouse (14 items), Schedule Waste and Waste Treatment Pond in Mandah Factory (16 items).- Harvest activity in Block F24 Division 4 RSE, incomplete item (14 items). Based on the above, known that the company has not been able to ensure the first aid box in the field meets the requirements.					
Auditor's Conclusion on March 7, 2018 Based on auditor verification, the non conformity is stated not yet fulfilled and be increased to be Major category (minor raised to major).					

Auditor's Conclusion on April 23, 2018

The Company sends some improvements in the form of:

- Inter Office Mail (IOM) from PT BNS Central Clinic to all units at PT BNS. The IOM was issued on March 10, 2018 with the number 01 / BNS / Klinik Sentral / TBEIII / 2018 on the management of first aid boxes.
- Socialization of Inter Office Mail (IOM) 01 / BNS / Central Clinic / TBEIII / 2018 on the management of first aid kit at Rotan Semelur Estate (RSE) on March 13, 2018.
- Decision Letter Appointment of Supervisory Officer of First Aid Box in each management unit.
- Checklist for monitoring and use of revised P3K medicine checklists.

Based on the above matters, the non conformity shall be fulfilled with an observation note on the next audit.

Verified by : **Yudhi Yuniarto Tallutondok**

<i>NCR No.</i>	:	2018.1	<i>Issued by</i>	:	Yudhi Yuniarto Tallutondok
<i>Date Issued</i>	:	9 March 2018	<i>Time Limit</i>	:	8 May 2018
<i>NC Grade</i>	:	Major	<i>Date of Closing</i>	:	18 April 2018
<i>Standard Ref. & Requirement</i>	:	2.1.1 Evidence of compliance with relevant legal requirements shall be available.			
<i>Non-Conformance Description & Evidence observed (filled by auditor):</i>					
Based on field visits and interviews with mill workers are known that the MDF engine operators are not licensed diesel machine operator. Beside that, there is no evidence of land title utilization report has been delivery to National Land Agency office. Based on the above, it is known that the certificate holder has not showed compliance with the applicable regulations, accordance with minister of labor number 38 of 2016 and ministers of the national Land Agency number 7 of 2017.					
<i>Root Cause Analysis (filled by organization audited):</i>					
<ul style="list-style-type: none">License Units have no operator license list <ul style="list-style-type: none">Mandatory Report of Cultivation Rights<ul style="list-style-type: none">No mandatory report monitoring and report submission schedule to agencies.No officer monitors operator licenses and updates delivery reports from units to agencies.					
<i>Correction (filled by organization audited):</i>					
<i>Koreksi (dilengkapi oleh organisasi yang diaudit):</i>					
<ul style="list-style-type: none">License<ul style="list-style-type: none">Compile a list of operator licensesPrepare unlicensed operator training programsMandatory Report of Cultivation RightsPrepare a list of reports that should be sent to agencies such as reports on land use of Cultivation Rights to the National Land Agency (Badan Pertanahan Nasional)					
<i>Corrective Action (filled by organization audited):</i>					
<ul style="list-style-type: none">Updating the employee training program as neededAppoints the head of administration as PIC to monitor delivery of reports to agencies					
<i>Assessor Evaluation and Conclusion (filled by auditor):</i>					
Auditor's conclusion on April 18th, 2018.					
The Company sends some improvement evidence as follows:					

- Monitoring licenses, sample shipments and reports to the Government Agency 2018.
- Certificate by PT Arpindo Pratama with number 429 / AP / SK-PTP / IV / 18 dated April 8, 2018. The certificate explains that the employees on behalf of Fadli Hidayat have followed the training of Motor Diesel Operator organized by PT Arpindo Pratama cooperate with the Ministry of Manpower of the Republic of Indonesia on April 6 - 8, 2018 in Pekanbaru, Riau where the certificates and license cards are still in process.
- Receipt of Land Use Report of PT Bhumireksa Nusa Sejati by National Land Agency of Indragiri Hilir Regency on 12 April 2018.

Based on the above matters then this non-conformity is stated to be Closed.

Verified by : Yudhi Yuniarto Tallutondok

NCR No.	2018.2	Issued by	Yudhi Yuniarto Tallutondok
Date Issued	9 March 2018	Time Limit	8 May 2018
NC Grade	Major	Date of Closing	26 March 2018
Standard Ref. & Requirement	4.1.1 Standard Operating Procedures (SOPs) for estates (land clearing to harvesting) and SOP for mills (reception of FFB to dispatch of CPO and PKO) shall be available.		
Non-Conformance Description & Evidence observed (filled by auditor): Based on field observation and interviews with harvester in Block F24 Division 4 RSE known that after working the harvest equipment is not taken to storage but left at work. It is not in accordance with the Procedures of Harvesting Equipment Storage. 002 / SOP-BNS.			
Root Cause Analysis (filled by organization audited): <ul style="list-style-type: none">- Harvesters have difficulty in bringing home a harvest tool for reasons of great distances and lack of harvests knowledge related to the procedure of harvest storage- Supervision does not check the harvesting tool when it comes home from work			
Correction (filled by organization audited): <ul style="list-style-type: none">- Socialization to all harvest employees related to the procedure of harvest storage- Issuing prohibition memorandums on harvesting tools is not allowed to be left in the field- Conduct checking the harvesting tools at home from work- Implemented the storage of the harvest tools in the tool room of the division after it was done			
Corrective Action (filled by organization audited): <ul style="list-style-type: none">- Enable harvest storage space.- Checking all the harvesting tools have returned to the division tool storage room after work.- Publishing the RSE Memo Manager on the Harvest & Safety Tool- Revise procedures on harvest storage			
Assessor Evaluation and Conclusion (filled by auditor): Auditor's conclusion on 26 March 2018. The Company sends some improvements in the form of: <ul style="list-style-type: none">- Socialization of Harvesting at Rotan Semenur Estate on March 10, 2018. The socialization was attended by 20 employees of harvest. A list of presentations and documentation is available.- Memo issued by RSE Estate Manager on March 12, 2018 about harvest and safety equipment. In the memo explained that "after work, must bring the harvest tool back and keep the tool protective device.			

- Socialization of Harvesting Equipment Storage at Mandah Estate on April 13, 2018 located in front of Division Office. Socialization was attended by supervision and employees with a total of 85 people. Attendance list, documentation and materials are attached.
- Document checklist of harvesting tool inspection at home from work for unit of RSE and MDE period March - April 2018.

Based on the above matters, this non-conformity is stated to be Closed with the observation note in the next assessment.

Verified by : Yudhi Yuniarto Tallutondok

NCR No.	2018.3	Issued by	Yudhi Yuniarto Tallutondok
Date Issued	9 March 2018	Time Limit	8 May 2018
NC Grade	Major	Date of Closing	18 April 2018
Standard Ref. & Requirement	4.7.2. A documented risk assessment shall be available and its implementation shall be recorded.		
Non-Conformance Description & Evidence observed (filled by auditor): The CH has not been able to demonstrate risk analysis (HIRAC) for all activities. For example home construction activities.			
Root Cause Analysis (filled by organization audited): The unit does not perform risk analysis of all work / activities to be performed in the unit so that there are activities / work done in the unit but not yet identified risk analysis.			
Correction (filled by organization audited): Creating potential hazard analysis prior to undertaking work / activities documented in accordance with the Risk Identification and Risk Assessment Procedure (HIRAC) no. SPO / 015 / BNS / 2012			
Corrective Action (filled by organization audited): <ul style="list-style-type: none"> - Make HIRAC for Home Development and burning stove - Socialize the HIRAC documents to all workers. - Provide Safety Briefing to all people who will do the work / activities within the unit environment. 			
Assessor Evaluation and Conclusion (filled by auditor): Auditor's conclusion on 18 April 2018 The Company sent evidence of improvement of HIRAC housing construction to contractor employees conducted at the Safety Briefing on 13 April 2018 by MDF OHS Expert and MDF Head of Administration located in housing and front of MDF office. The socialization was attended by 7 contractor workers. Socialization materials and documentation are available.			
Based on the above matters, this non-conformity is stated to be Closed .			
Verified by	Yudhi Yuniarto Tallutondok		

NCR No.	2018.4	Issued by	Yudhi Yuniarto Tallutondok
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<i>Date Issued</i>	: 9 March 2018	<i>Time Limit</i>	: 8 May 2018
<i>NC Grade</i>	: Major	<i>Date of Closing</i>	: 1 May 2018
<i>Standard Ref. & Requirement</i>	4.7.3 Records of Occupational Health and Safety (OHS) program (see 4.8) and Personal Protective Equipment (PPE) training in accordance with the result of hazard identification and risk analysis shall be available to all workers.		
<i>Non-Conformance Description & Evidence observed (filled by auditor):</i> Based on field observation and interviews with workers in operational activities and verification related to personal protective equipment found the fact that: <ul style="list-style-type: none"> - Crane operators, sterilizer operators, engine room operators, waste treatment pond operators, and water treatment plan operators known to buy their own PPE (shoes). - Pesticide Applicators in Block E30 Division 2 RSE, known to buy their own PPE (shoes) because they have not get the division. Based on document verification of Personal Protective Equipment Changes Procedure with number SOU20/APD/X/2017 known that the PPE (shoe) giving once every 1 year. Based on the above known that the procedure has not been in accordance with Permenakertrans No 8 of 2010 so that workers buy their own personal protective equipment in work. 			
<i>Root Cause Analysis (filled by organization audited):</i> <ul style="list-style-type: none"> • Each unit does not have a stock of PPE inventory and this has not been contained in the PPE Procedure (No. SOU20 / APD / X / 2017) resulting in the discovery of some employees purchasing their own PPE. • Procedures are not in accordance with Permenakertrans No 8 of 2010, in which the PPE should be provided by the company. 			
<i>Correction (filled by organization audited):</i> Revising Procedure of PPE: <ul style="list-style-type: none"> - Provide PPE stock according to potential occupational hazard at least 10% of total employees - Establish a mechanism for awarding PPE (the company will replace any damaged PPE based on employee report / supervisor / assistant checks). 			
<i>Corrective Action (filled by organization audited):</i> <ul style="list-style-type: none"> - Conduct monthly PPE checklist checks by Supervision - Provide stock of PPE in each unit 			
<i>Assessor Evaluation and Conclusion (filled by auditor):</i> Auditor's conclusion on 1 May 2018. The Company sends some improvement evidence as follows: <ul style="list-style-type: none"> - Revision number I of the Personal Occupational Safety and Health Guidelines (SOP) of Personal Protective Equipment with number SOU20-APD / X / 2017. - Checklist of the use of PPE Operator, Helper and Employees RSE, MDE and MDF Period March - April 2018. - Documentation of PPE stock in Warehouse Central. - Socialization related to the revision of PPE Procedure number SOU20-APD / X / 2017 on April 13, 2018 located in front of Office. Socialization was attended by supervision and employees with a total of 85 people. Attendance list, documentation and materials are attached. <p>Based on the above matters, this non-conformity is stated to be Closed with the observation note in the next assessment.</p>			
<i>Verified by</i>	: Yudhi Yuniarto Tallutondok		

NCR No.	: 2018.5	Issued by	: Andi Pratama Pasaribu
Date Issued	: 14 March 2019	Time Limit	: 13 June 2019
NC Grade	: Minor raised to be Major	Date of Closing	: 29 May 2019
Standard Ref. & Requirement	6.1.4 The documented plan for management and monitoring of social impacts, shall be reviewed at least on two-yearly basis. If necessary, the plan should be updated. There shall be evidence that the review process includes participation of all affected parties.		
Non-Conformance Description & Evidence observed (filled by auditor): CH has not been able to show evidence of a review / evaluation of the social impact management plan at least every 2 years			
Root Cause Analysis (filled by organization audited): The related staff didn't fully understand the mechanism for monitoring the realization of social impact management plan.			
Correction (filled by organization audited): Showing result of the social impact review/evaluations in the form of questionnaire result, it was involving the surrounding community and employees as well as realization for reducing social impact evidences.			
Corrective Action (filled by organization audited): Appoint an officers and make a schedule every 2 years for evaluating the social impacts.			
Assessor Evaluation and Conclusion (filled by auditor): Verification on 12 March 2019 The company was shown realization of Social Impact Reduction in Surrounding Village (Parit Gurah Baru, Parit Teluk Air, Cahaya Baru, and Belaras Barat Village). There are management plan on below explanations: <ol style="list-style-type: none"> Issues: Canal flow on the Cahaya Baru Village is filled with water hyacinth. Follow up: cleaning canal from water hyacinth and moss with the community to facilitate transportation for the company and villagers. Issues damaged of bridge between Teluk Air & Gurah Baru Villages. Follow up: repairing the bridge as the main access for village roads with the company. Issues: long distance between villages and school in the companies (\pm 12 Km). Follow up: provided the shuttle transportation (boat) for children's. The company has social impact management plan for the period 2018 to 2019 period, such as: <ol style="list-style-type: none"> Cleaning of the canal every month Community assistance every month School transportation for children every month Work agreement every month Verification 29 May 2019 The company was show several evidence, as follows: <ol style="list-style-type: none"> The realization of the Social Impact Assessment (internal, external and contractor) in 2019 consist of: <ol style="list-style-type: none"> Gradual appointment of permanent workers in 2019, there are 46 workers dated 24 January 2019. Repair of housing, construction of new houses have been built (10 units of G2). Priority distribution to the harvesters, barges operators and security. 			

- c. Provision of drinking water during dry season to all workers, there are also Water Treatment Plant built plan on the Estate.
- d. Career opportunities for workers, workers children and the surrounding communities, such as: providing scholarships for worker children and surrounding communities. In the form of tuition, book, provision money with the terms and conditions.
- e. Completion of the land dispute: the company has applied for exlude HGU area of 5,485 Ha to the Agrarian Minister.
- f. PPE replacement damaged: replacement of PPE's in accordance to procedure, and a minimum stock of 10% of the budget. For replacement of damaged PPE's before life cycle limit.
2. The Social Impact Management Program for period of 2019 – 2020 icludes:
 - a. Appointment of non permanent workers into permanent workers will be carried out gradually, especially harvesters to ratio of 1:18. This appointment is based on the performance evaluation for three months.
 - b. Non permanent workers contract are two years and also on the contract there is no promotion to permanent workers clause.
 - c. Provision of drinking water during dry season still carried out in 2020.
 - d. The scholarship program will continue in 2020.
 - e. Plantation Service Department will continue to monitor and coordination with head office regarding the land dispute resolution.
 - f. Replacing of PPE's is once a year, if any damaged before the replacement period. It can be replaced according to procedure. In addition, the procedure will be socialized every Saturday to all workers.
3. Budget for the construction of housing complex in 2019 to 2023.
4. Records of the provision of drinking water, RSE: 1,110 workers, MDF: 104 workes.
5. The list of scholarship applicant year of 2019, there are six workers children and two villagers. The selection conducted on 10 May 2019.
6. There are letter from Plantation Services Department to the Agrarian Minister about application for the release of HGU area of 5,485 Hectare from Director of PT BNS number 027/BNS/UM/PSD-1/2018 dated 8 January 2018.

Auditor Conclusions:

Based on above document, this nonconformities has been closed out.

Verified by : **Trismadi N**

<i>NCR No.</i>	:	2018.6	<i>Issued by</i>	:	Brigitta Prita
<i>Date Issued</i> Tanggal diterbitkan	:	9 March 2018	<i>Time Limit</i>	:	8 May 2018
<i>NC Grade</i>	:	Major	<i>Date of Closing</i>	:	23 April 2018
<i>Standard Ref. & Requirement</i>	:	6.5.2 Collective Labor Agreement/Company Regulation, in accordance with the manpower regulations, shall be available in understandable language and explained by the management or abor union to the workers.			
<i>Non-Conformance Description & Evidence observed (filled by auditor):</i>					
Document review and interview with fixed-term contract workers known that:					

- CH has not been able to show proof of the socialization the contents of work agreement to fixed-term contract workers that working from February 2018.
 - CH has not been able to provide handover evidence of work agreement copy to contract workers that working from February 2018
 - Interview with contract workers known that they didn't understand about the work agreement
- Based on this CH has not been able to show evidence that the worker has been given a explanation regarding the work agreement that detailing the payment and working conditions.

Root Cause Analysis (filled by organization audited):

- Every workers who will work in the CH has been given socialization related to the contents of the work agreement to every work, but there are some workers who still lack understanding.
- A copy of the work agreement has not been given to PKWT workers.

Correction (filled by organization audited):

- Re-socialize to PKWT workers to ensure that workers have understood the contents of the employment agreement.
- Documenting evidence of socialization and evidence of handover of a copy of the work agreement.

Corrective Action (filled by organization audited):

- Socialize to all new PKWT workers and ensure that workers understand the contents of the work agreement and document all the activities related to it.

Assessor Evaluation and Conclusion (filled by auditor):

23 April 2018

The management unit has shown the record of work agreement socialization to 11 PKWT (AKAD) workers that working since January and February 2018. The activity was conducted on 20 April 2018 at the Mandah Estate office. In addition, a copy of the agreement was also made to 11 PKWT workers. Based on these explanations the Non-conformity No. 2018.6 is closed and will be observed again at the next visit.

Verified by : **Brigitta Prita**

<i>NCR No.</i>	:	2018.7	<i>Issued by</i>	:	Andi Pratama Pasaribu
<i>Date Issued</i>	:	9 March 2018	<i>Time Limit</i>	:	8 May 2018
<i>NC Grade</i>	:	Major	<i>Date of Closing</i>	:	3 May 2018
<i>Standard Ref. & Requirement</i>	:	6.12.1 There shall be evidence that no forms of forced or trafficked labor are used.			
<i>Non-Conformance Description & Evidence observed (filled by auditor):</i>					
Interview with inter-area workers and document review known:					
1. The company has provided socialization to recruitment agencies related to company location, workplace conditions, labor income (including base / target), composition of planting year, staple height, worker facility. However, there is no evidence that the same information has been described to prospective workers in the place of origin.					
2. The signing of the work agreement is done at the company's location, while the contents of the agreement are not yet known by the worker in the place of origin for the inter-area workers.					
3. Details explanation of wage is not explained by the field officer of the recruiting agent.					

4. Informed in the place of origin of inter-area workers where the status of the worker is training, but not informed the work target.
5. Informed at the place of origin of inter-area workers that the worker gets a decent home, but the worker is currently working in a less decent home.
6. Informed at the place of origin of inter-area workers that the worker gets the shuttle facility from the housing to the work location, but currently the worker is only transferred to the work location and to go home is not given the facility.
7. Prospective workers are not disclosed regarding penalties, whereas in the work agreement there is a penalty-related provision if leaving the workplace before the deadline.

Based on this it is known that the recruitment process for inter-area workers has not proven the absence of coercion in any form.

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

Evidence of socialization at the place of origin of recruits that explain the related company information, as well as the contents of the work agreement can not be shown because it is still in HRM.

Correction *(filled by organization audited):*

- HRM has conducted socialization to prospective workers of inter-area workers at the place of origin of recruit according to Labor Recruitment Procedure of Inter-area Worker no. 412 / SKU-AKAD / GRAS
- Record the socialization evidence

Corrective Action *(filled by organization audited):*

- Signing a Work Agreement at the original location of inter-area worker recruitment and documenting it.

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

23 April 2018

The management unit has shown record of pre-employment recruitment of inter-area worker conducted in the area of origin. These activities include explaining about company location, workplace conditions, labor income (including base / target), composition of planting year, staple height and worker facility. However, there are several things that have not been shown, namely information related to worker / probation status, shuttle and penalty facility. Based on this non-conformity is not fulfilled.

3 May 2018

The management unit has demonstrated examples of work agreements that include explaining the status of workers, shuttle facilities and penalties. Based on the above non-conformity is closed and will be re-observed during the next visit.

Verified by : **Andi Pratama Pasaribu**

NCR No.	2018.8	Issued by	Andi Pratama Pasaribu
Date Issued	9 March 2018	Time Limit	8 May 2018
NC Grade	Major	Date of Closing	23 April 2018
Standard Ref. & Requirement	6.12.3 Where migrant/foreign/honorary workers are employed, a special workers policy and procedures and the evidence of implementation shall be available.		

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

The management unit has not demonstrated a specific labor policy that explains the non-substitution of the employment agreement, post-arrival orientation program with a primary focus on OSH, employment law and the provision of decent living conditions.

Root Cause Analysis (filled by organization audited):

The policy has not been shown because it is still in HRM.

Correction (filled by organization audited):

The policies are listed in the Manpower Recruitment Procedure of inter-area worker No. 412 / SKU-AKAD / GRAS

Corrective Action (filled by organization audited):

Recruiting inter-area worker in accordance with procedures

Assessor Evaluation and Conclusion (filled by auditor):

23 April 2018

The management unit has had the inter-area worker recruitment procedure dated 16 September 2015. In the procedures described related to:

- Briefing / Orientation: the recruitment team should inform the condition of the facilities and infrastructure, the compensation and benefits, the condition of the estate and the plants and other matters necessary to the prospective worker of inter-area worker before the selection process.
- Work Agreement: The recruiter explains the content of the cooperation agreement to inter-area worker in order to be understood. Inter-area workers are required to sign a work agreement before leaving for the destination location.
- Introduction period: inter-area worker receive recognition and training before starting work
- Inter-area workers who pass the selection must be protected by accident insurance and death insurance during the journey since departure from the origin until arrived at the business unit.
- Facilities and infrastructure for inter-area workers for residence and work must be provided by the company before the inter-area worker arrives at the company area.

Based on the explanation, the non-conformity is closed.

Verified by : **Andi Pratama Pasaribu**

NCR No.	: 2018.9	Issued by	: Andi Pratama Pasaribu
Date Issued	: 9 March 2018	Time Limit	: 8 May 2018
NC Grade	: Major	Date of Closing	: 8 May 2018
Standard Ref. & Requirement	General Chain of Custody 5.1.1 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.		

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

Facility cannot show his agreement of physical handling of oil palm product that his produce. For example, leasing contract of CPO bulking with PT Dumai Paricitra Abadi.

Root Cause Analysis (filled by organization audited):

The company doesn't have documents regarding to a third party holding CSPO / CSPK handling and sales contract documents because the documents are stored by the Departement Marketing and Departement Dept. L & D in Jakarta.

Correction (filled by organization audited):

- Request the document to Departement Marketing Jakarta
- Based on documents and information from Dept. Marketing Jakarta, that PT BNS does not have any cooperation related to the physical handling of CSPO with PT DPA, while sending CPO to bulking PT. DPA has sales status to PT Aneka Inti Persada, PT Tunggal Mitra Plantation & PT Lahan Tani Sakti.
- The company Shows sales contract of PT BNS with PT Aneka Inti Persada, PT Tunggal Mitra Plantation & PT Lahan Tani Sakti.

Corrective Action (filled by organization audited):

- Provide the PIC to coordinate to the department L & D Jakarta to request copies of documents relating to third parties who handled certified oil palm product then store it in the unit so that it can be accessed when needed.
- Conducts internal audit 2 months before external audit is conducted.

Assessor Evaluation and Conclusion (filled by auditor):

Verification, May 4th, 2018.

The Company has presented evidence in the form of letter of agreement (lease storage tank) with PT. Dumai Paricitra Abadi where the contract is another Sime Darby Plantation unit. PT Bhumireksa Nusasejati is not included. However, in accordance with the shipping oil palm product data provided to the auditor at the time of the audit, there was a delivery of CPO of 3,000,103 kg (DO No. 08 / BNS / DO-DMI / IV / 2017) in May 2017 (during the ASA-3 certificate period) to bulking PT. Dumai Paricitra Abadi with deposit status. Thus, it can be concluded that there is a physical management cooperation certified oil palm product but not yet shown the cooperation document.

Verification, May 8th, 2018.

The Company has shown evidence of improvement in the form of a sales contract stating that the 3,000,103 kg (DO No. 08 / BNS / DO-DMI / IV / 2017) CPO delivery period in May 2017 is basically inter-company sales under the Sime Darby Plantation group. In the contract No. 00250 / BNS / KTR-MKSLOK / 2017 document listed CPO sales between PT. BNS with PT. Aneka Inti Persada.

Conclusion of Auditor, May 8th, 2018.

Based on evidence of improvement, this non-conformity is stated to be Closed.

Verified by : **Andi Pratama Pasaribu**

NCR No.	: 2018.10	Issued by	: Andi Pratama Pasaribu
Date Issued	: 9 March 2018	Time Limit	: 8 May 2018
NC Grade	: Major	Date of Closing	: 1 May 2018

Standard Ref. & Requirement	: General Chain of Custody 5.3.1 The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified.
Non-Conformance Description & Evidence observed (filled by auditor): Facility has had procedure for SCCS with IP model in document named SOP For Product Supply Chain System (No: 027/BNS-SCCS/12) which was approved on 1 st September 2012 which described the duties and responsibilities of each part; the identification of raw materials and products; and performs supply chain system. However, those procedure does not covering: <ul style="list-style-type: none"> • Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. • Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). 	
Root Cause Analysis (filled by organization audited): The existing SCCS SOP is incomplete and up to date in accordance with Revised RSPO Supply Chain Certification Document, June 2017.	
Correction (filled by organization audited): <ul style="list-style-type: none"> • Revise and update the SCCS SOP in accordance with the Revised RSPO Supply Chain Certification Document, June 2017. • - Conducting socialization or training to stakeholders regarding the latest SCCS SOP changes. 	
Corrective Action (filled by organization audited): Perform consistent SCCS implementation procedures in accordance with applicable SOP.	
Assessor Evaluation and Conclusion (filled by auditor): Verification, May 1 st 2018. Based on the evidence of the improvements, the company already has a SOP of Product Identity Preserved Supply Chain System (027 / BNS-SCCS / 12) approved by the estate manager and mill manager on April 10 th , 2018. The procedure regulates procedures, special conditions and administrative facilities in the application of supply chains in factories that have been adapted to RSPO Supply Chain Certification Document, June 2017. In addition there is also a plan document and realization of training to workers related to supply chain understanding to all staff on April 12 th , 2018 in the Area Controller office (followed by 27 participants). Conclusion of Auditor, May 1 st 2018. Based on evidence of improvement, this non-conformity is stated to be Closed.	
Verified by	: Andi Pratama Pasaribu

NCR No.	: 2018.11	Issued by	: Andi Pratama Pasaribu
Date Issued	: 9 March 2018	Time Limit	: 8 May 2018
NC Grade	: Major	Date of Closing	: 1 May 2018
Standard Ref. &	: General Chain of Custody 5.3.2		

Requirement	The site shall have a written procedure to conduct annual internal audit
<i>Non-Conformance Description & Evidence observed (filled by auditor):</i>	
Facility cannot show the internal audit procedure that covering the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents including assessment of it effectively.	
<i>Root Cause Analysis (filled by organization audited):</i>	
Internal audit procedures have not been showed because there are no procedures available in the operational unit.	
<i>Correction (filled by organization audited):</i>	
<ul style="list-style-type: none"> • Make internal audit procedures that include RSPO SCCS and RSPO Market Communications and Claims Documents requirements. • Conduct SCCS audit in accordance with applicable procedures. 	
<i>Corrective Action (filled by organization audited):</i>	
Conducting internal audits once a year before an external audit is conducted.	
<i>Assessor Evaluation and Conclusion (filled by auditor):</i>	
Verification, May 1st, 2018. The Company has shown improvement evidence of SOP of SCCS Audit Internal Audit (027a / BNS-INT-ADT / SCCS / 18). It has also been shown sample of internal audit documents and training needs analysis every year.	
Conclusion of Auditor, May 1st 2018. Based on evidence of improvement, this non-conformity is stated to be Closed.	
<i>Verified by</i>	: Andi Pratama Pasaribu

NCR No.	: 2018.12	Issued by	: Andi Pratama Pasaribu
Date Issued	: 9 March 2018	Time Limit	: 8 May 2018
NC Grade	: Major	Date of Closing	: 4 May 2018
Standard Ref. & Requirement	General Chain of Custody 5.5.1 In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mill cannot outsource processing activities like refining or crushing.		
<i>Non-Conformance Description & Evidence observed (filled by auditor):</i>			
After processed the FFB, facility sell their product (CPO and PK) to the buyer directly. Some transaction has using subcontractor for bulking or transporter. However, facility cannot ensure yet the third parties who handling their certified palm oil product in accordance with RSPO Supply Chain Certification Standard requirements'.			

Root Cause Analysis <i>(filled by organization audited):</i> All documents relating to third parties handling CSPO and CSPK are at the Dept. Marketing and Dept. L & D in Jakarta.	
Correction <i>(filled by organization audited):</i> The evidence is contained in the transport agreement, one of which is that there is no mixing of other products other than the product of PT BNS which is certified.	
Corrective Action <i>(filled by organization audited):</i> Assign a PIC to monitor documents relating to SCCS such as expenses / sales, and agreements with 3rd parties conducting CSPO and CSPK handling and ensure they are in compliance with applicable SCCS procedures through internal audits conducted at least once a year.	
Assessor Evaluation and Conclusion <i>(filled by auditor):</i> Verification, May 4 th , 2018. The Company has showed evidence copy of the oil palm product transport agreement with PT. Trans Samudera Mandiri and PT. Mitsi Citra Mandiri. However, there is no evidence that third parties working with the company are in compliance with the RSPO Supply Chain Certification Standard. Verification, May 8 th 2018. The Company has showed an example agreement with one of the third parties handling the certified oil palm product (PT Trans Samudera Mandiri) stating that the certification body has access to transporters in the supply chain. Conclusion of Auditor, May 4 th 2018. Based on evidence of improvement, this non-conformity is stated to be Closed.	
Verified by	: Andi Pratama Pasaribu

NCR No.	: 2018.13	Issued by	: Andi Pratama Pasaribu
Date Issued	: 9 March 2018	Time Limit	: 8 May 2018
NC Grade	: Major	Date of Closing	: 7 May 2018
Standard Ref. & Requirement	General Chain of Custody 5.5.2 Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following: <ol style="list-style-type: none"> The site has legal ownership of all input material to be included in outsourced processes; The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. 		

	<p>d. The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance.</p>
<p>Non-Conformance Description & Evidence observed (filled by auditor):</p> <p>Facility cannot ensure the third parties who handling their certified palm oil product has fulfilled:</p> <ol style="list-style-type: none"> Has an agreement or contract that covered all certified palm oil product handling activity and ensuring the CB's have access to the outsourcing contractor or operation if necessary. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. 	
<p>Root Cause Analysis (filled by organization audited):</p> <p>All agreements handling activities of certified oil palm products with third parties are in Dept. L & D in Jakarta.</p>	
<p>Correction (filled by organization audited):</p> <ul style="list-style-type: none"> Shows evidence of transportation contracts of CPO products and contact lists of contractors that may be accessed by certification bodies. Create a training plan / socialization of SCCS procedures to contractors handling certified oil palm products, as planned in June 2018. 	
<p>Corrective Action (filled by organization audited):</p> <p>Provide PIC to coordinate to Dept. L & D in Jakarta to request copies of documents relating to third parties who handled certified oil palm product to then store it in the unit so that it can be accessed when needed.</p>	
<p>Assessor Evaluation and Conclusion (filled by auditor):</p> <p>Verification, May 4th 2018. The Company has showed evidence of a copy of the oil palm product transport agreement with PT. Trans Samudera Mandiri and PT. Mitsi Citra Mandiri. However, there is no evidence that third parties working with the company are in compliance with the RSPO Supply Chain Certification Standard.</p> <p>Verifiction, May 7th, 2018. The Company has showed SCCS training plan for third parties was conducted on June 2018. The Company has also shown an example agreement with one of the third parties handling the certified oil palm product (PT Trans Samudera Mandiri) stating that the certification body has access to the transporter in the related supply chain.</p> <p>Auditor's conclusion May 7th, 2018 Based on the evidence of improvement that has been shown, this non-conformity is stated Closed with Observation. The effectiveness of the improvement evidence will be a further verified part of the next assessment activity (Re-certification).</p>	
Verified by	: Andi Pratama Pasaribu

NCR No.	: 2018.14	Issued by	: Andi Pratama Pasaribu
Date Issued	: 9 March 2018	Time Limit	: 8 May 2018

NC Grade	:	Major	Date of Closing	:	1 May 2018
Standard Ref. & Requirement	:	General Chain of Custody 5.5.3 The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.			
Non-Conformance Description & Evidence observed (filled by auditor): Facility cannot show record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.					
Root Cause Analysis (filled by organization audited): There is no name and contact details available from all contractors who outsource oil palm product because the data in Dept. L & D Jakarta.					
Correction (filled by organization audited): Make a list of names and contact details of all contractors who carry out the transport of PT BNS products.					
Corrective Action (filled by organization audited): Provide a PIC to update contractor data handling PT BNS oil palm product.					
Assessor Evaluation and Conclusion (filled by auditor): Verification, May 1st, 2018. The Company has listed the contractor of oil palm product transportation PT. Bhumireksa Nusasejati. Conclusion of Auditor, May 1st 2018. Based on evidence of improvement, this non-conformity is stated to be Closed.					
Verified by	:	Andi Pratama Pasaribu			

NCR No.	:	2018.15	Issued by	:	Andi Pratama Pasaribu
Date Issued	:	9 March 2018	Time Limit	:	8 May 2018
NC Grade	:	Major	Date of Closing	:	1 May 2018
Standard Ref. & Requirement	:	General Chain of Custody 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			
Non-Conformance Description & Evidence observed (filled by auditor): Facility cannot shown the training plan of RSPO Supply Chain Standards to the related staff.					
Root Cause Analysis (filled by organization audited):					

Training related to SCCS has not been included in the staff and workers training identification matrix.	
Correction (filled by organization audited): Create SCCS training plan to all related staff.	
Corrective Action (filled by organization audited): Assign a PIC to update training programs related to SCCS.	
Assessor Evaluation and Conclusion (filled by auditor): Auditor Verification May 1st, 2018. The Company has shown evidence of improvement in the form of training identification matrix where there is an SCCS training schedule to workers directly related to SCCS implementation. In addition, there is also a plan document and training realization to workers related to supply chain understanding to all staff on April 12 th , 2018 located in Controller Area office (followed by 27 participants). Conclusion of Auditor, May 1st 2018. Based on evidence of improvement, this non-conformity is stated to be Closed.	
Verified by	: Andi Pratama Pasaribu

NCR No.	: 2018.16	Issued by	: Andi Pratama Pasaribu
Date Issued	: 9 March 2018	Time Limit	: 8 May 2018
NC Grade	: Major	Date of Closing	: 7 May 2018
Standard Ref. & Requirement	General Chain of Custody 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		
Non-Conformance Description & Evidence observed (filled by auditor): Facility cannot show the evidence of RSPO Supply Chain Standards training to the related supply chain officer.			
Root Cause Analysis (filled by organization audited): SCCS training has not been conducted because it is not included in the staff and workers training plan.			
Correction (filled by organization audited): Updating the training plan and Conducting SCCS training to all related staff.			
Corrective Action (filled by organization audited): Conducting training on schedule that has been made.			
Assessor Evaluation and Conclusion (filled by auditor): Verification, May 1st, 2018.			

The Company has shown evidence of improvement in the form of training identification matrix where there is an SCCS training schedule to workers directly related to SCCS implementation. In addition, there is also a plan document and realization of training to workers related to supply chain understanding to all levels of workers and staff on April 12, 2018 held in Controller Area office (followed by 27 participants) and the material presented. However, there is no evidence of training implementation to workers directly related to SCCS implementation. For example, field officers in the estate and factory.

Verification, May 7th 2018.

The management unit has shown evidence of improvement in the form of SCCS training evidence for the implementing workers in the estate which was held on May 3rd, 2018 at Mandah Estate meeting room and attended by 23 participants. In addition, SCCS training was also showed at Mandah Factory on May 5th, 2018 which was attended by 21 participants.

Conclusion, May 7th, 2018.

Based on evidence of improvement, this non-conformity is stated to be Closed.

Verified by : **Andi Pratama Pasaribu**

NCR No.	2018.17	Issued by	Andi Pratama Pasaribu
Date Issued	9 March 2018	Time Limit	8 May 2018
NC Grade	Major	Date of Closing	1 May 2018.
Standard Ref. & Requirement	General Chain of Custody 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		
Non-Conformance Description & Evidence observed (filled by auditor): Facility cannot show the document regarding to CSPO and CSPK sales including storage leasing, transporter etc.			
Root Cause Analysis (filled by organization audited): Documents related to the sale of CSPO & SCPK CSPK including the rental of tank, transportation, etc. are not yet shown because they are located in the Head Office.			
Correction (filled by organization audited): Shows documents related to the sale of CSPO & SCPK and transport agreement.			
Corrective Action (filled by organization audited): - Assign officers to update and request documents related to SCCS. - Conducting internal audit at least 2 months before the implementation of external audit.			
Assessor Evaluation and Conclusion (filled by auditor): The Company has showed evidence of improvements in the form of: 1. Copies of CPO sales and contract documents. 2. Some sample copies of contract (agreement) of Transport between buyer and oil palm product transporter.			
Auditor's Conclusion May 1st, 2018. Based on evidence of improvement, this non-conformity is stated to be Closed.			

<i>Verified by</i>	: Andi Pratama Pasaribu
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NCR No.	:	2018.18	Issued by	:	Andi Pratama Pasaribu
Date Issued	:	9 March 2018	Time Limit	:	8 May 2018
NC Grade	:	Major	Date of Closing	:	4 May 2018
Standard Ref. & Requirement	:	General Chain of Custody 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			
Non-Conformance Description & Evidence observed (filled by auditor): Facility cannot show the procedure regarding to retention time for all records and reports of supply chain.					
Root Cause Analysis (filled by organization audited): The shelf life procedure document related Supply Chain is not yet available.					
Correction (filled by organization audited): Create a document shelf life procedure listed in SOP SCCS no. 027 / BNS-SCCS / 12.					
Corrective Action (filled by organization audited): Provide the PIC to update applicable procedures and Performing document retention in accordance with applicable procedures.					
Assessor Evaluation and Conclusion (filled by auditor): Verification, May 4 th , 2018. The Company has shown evidence of SOP Supply Chain improvement (027 / BNS-SCCS / 12) where clause 8.8 states that the supply chain of the supply chain shall be a minimum of 2 years.					
Conclusion of Auditors May 4 th , 2018. Based on evidence of improvement, this non-conformity is stated to be Closed.					
Verified by	:	Andi Pratama Pasaribu			

NCR No.	: 2018.19	Issued by	: Andi Pratama Pasaribu
Date Issued	: 9 March 2018	Time Limit	: 8 May 2018
NC Grade	: Major	Date of Closing	: 7 May 2018
Standard Ref. & Requirement	D.3.1 The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following: <ol style="list-style-type: none"> Complete and up to date procedures covering the implementation of all the elements in these requirements; 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.
Non-Conformance Description & Evidence observed (filled by auditor): The Company already has an SCCS procedure with module D in SOP document for Supply Chain Procedure (No: 027 / BNS-SCCS / 12) approved on September 1 st , 2012 which describes the authority and responsibility of the related parties. However, the procedure does not include: <ul style="list-style-type: none"> • Complete and up to date procedures include the implementation of all supply chain elements. • Updated records and reports that can demonstrate conformity with supply chain requirements (including training recording). 	
Root Cause Analysis (filled by organization audited): The existing SCCS SOP has not been updated in accordance with the Revised RSPO Supply Chain Certification Document on June 2017.	
Correction (filled by organization audited): <ul style="list-style-type: none"> • Revise and update the SCCS SOP in accordance with the Revised RSPO Supply Chain Certification Document on June 2017. • Conducting socialization or training to stakeholders regarding the latest SCCS SOP changes. 	
Corrective Action (filled by organization audited): Perform consistent SCCS implementation procedures in accordance with applicable SOPs.	
Assessor Evaluation and Conclusion (filled by auditor): Verification, May 1st, 2018. Based on evidence of improvement, the company already has a SOP of Product Identity Preserved Supply Chain System (027 / BNS-SCCS / 12) approved by the estate manager and mill manager on April 10 th , 2018. The procedure regulates procedures, special conditions and administrative means in the application of supply chains in factories that have been adapted to RSPO Supply Chain Certification Document, June 2017. In addition there is also a plan document and realization of training to workers related to supply chain understanding to all levels of workers and staff on April 12 th , 2018 located in Controller Area office (followed by 27 participants). However, there is no evidence of training implementation to employees directly related to SCCS implementation. For example, field officers in the estate and factory.	
Verification, May 7th, 2018. The management unit has shown evidence of improvement such as SCCS training for workers in estate which was held on May 3 rd , 2018 at Mandah Estate meeting room and attended by 23 participants. In addition, SCCS training was also conducted at Mandah Factory on May 5 th , 2018 which was attended by 21 participants.	
Kesimpulan Auditor 7 Mei 2018 Berdasarkan hasil verifikasi bukti perbaikan diatas, ketidaksesuaian ini dinyatakan terpenuhi.	
Conclusion of Auditors May 7th, 2018. Based on evidence of improvement, this non-conformity is stated to be Closed.	
Verified by	: Andi Pratama Pasaribu

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

NCR No.	:	2019.01	Issued by	:	Trismadi N
Date Issued	:	14 March 2019	Time Limit	:	ASA-1.1
NC Grade	:	minor	Date of Closing	:	
Standard Ref. & Requirement	:	1.1.1. List of information related to criterion 1.2 that can be accessed by relevant stakeholders shall be available.			
Evidence observed (filled by auditor): 1. Based on the results of document verification and interview with the management it is known that PT BNS was established in 1990, previously a subsidiary of SAMBU Group. Then there were changes in ownership such as: the Salim Group in 1997; Kumpulan Guthrie Berhad in 2002, Minamas Gemilang in 2008, and Sime Darby Plantations in 2008. Record of land acquisition were not available again on the site. Therefore, based on interview with management and the surrounding communities in Teluk Bunian Village. There are planting compensations was carried out in the period of 2007 to 2009. However, the company has not been able to show a recapitulation of the previous land owners. 2. The company has not been able to show evidence of fire monitoring reports to the Plantation Agency as required in the Agriculture Minister Regulation Number 05 of 2018 article 31.					
Non-Conformance Description (dilengkapi oleh auditor): 1. The company has not been able to show recapitulation of previous land owners. 2. The company has not been able to show that all obligation reporting to the relevant agencies.					
Root Cause Analysis (filled by organization audited):					
Correction (filled by organization audited):					
Corrective Action (filled by organization audited):					
Assessor Evaluation and Conclusion (filled by auditor):					
Verified by	:				

NCR No.	:	2019.02	Issued by	:	Haikal Ramadhan Kharismansyah
Date Issued	:	14 March 2019	Time Limit	:	13 June 2019
NC Grade	:	Major	Date of Closing	:	11 May 2019
Standard Ref. & Requirement	:	4.5.1 Monitoring of Integrated Pest Management (IPM) plan implementation shall be available.			

Evidence observed (filled by auditor):

1. Agronomy Reference Manual for Oil Palm Planting No. Politics: 110 / EST-ARM / 13 in 2013 section 15 concerning Plant Protection. Among them are explaining about oil palm plant pests, census methods and frequencies, controlling method (for example : Palm Leaf Eating Caterpillar – under normal conditions once a month; Rat every 3 months; Ganoderma twice a year on peat soil in immature)
2. Census Recapitulation and Control of MDE Division 1 Oryctes for January and February 2019 Periods
3. Census of Ganoderma MDE Division I - IV attacks in December 2018
4. Recap of RSE Pest and Disease for mature and immature October - December 2018; January 2019 (Blocks D033, D034, D032, E31, E32, E33, C34) - Oryctes; Tirathaba; Nettle Caterpillar
5. Oryctes Census September - December 2018 and January 2019 RSE Division I (Blocks D33 and D34)
6. RSE and MDE consist of 5 divisions

Non-Conformance Description (dilengkapi oleh auditor):

1. Certificate Holder has not carried out a census of plant pests and diseases consistently according to what is stipulated in the Reference Minamas Plantation Agronomy Manual
2. It has not been able to show enough evidence that the census of plant pests and diseases has been carried out thoroughly for all types of potential pests and diseases and has been carried out in all divisions.

Root Cause Analysis (filled by organization audited):

The program and census realization have not been well monitored and the results of the *OPT* (Plant Pest Organism) census have not been reported in full to the main office because there is no PIC established to monitor the program and census & pest control realization so that the implementation in the field is not maximal

Correction (filled by organization audited):

Establish a PIC to monitor the program and realization of pest control so that reporting can be carried out periodically and evaluated every month

Corrective Action (filled by organization audited):

- Make monitoring of report on census results to main offices.
- Conduct periodic evaluations, namely once a month on the results of integrated pest control monitoring.
- Training periodically to integrated pest control officers by the Dept. of RC or Division Assistant every 1 year.
- Ensure that all census results have been carried out and reported to the main office in full and in accordance with ARM.

Assessor Evaluation and Conclusion (filled by auditor):
Verification on April 5, 2019

The company shows proof of improvement in the form of

1. Plant Pest and Disease Report of Mandah Estate January – December 2018 period
2. Plant Pest and Disease Report of Rotan Semelur Estate January – December 2018 (Oryctes, Palm Leaf Eating Caterpillar, and Tirathaba)

However, it has not shown:

1. Plant Pest Organism census period January and February 2019
2. RSE has not informed about the rat and ganoderma census.

Thus it can be concluded that nonconformities have not been fulfilled. There is still a need for additional evidence of improvement and further information on the root cause analysis, correction, and corrective action

Verification on May 11, 2019

Additional proof of improvement has been shown:

1. Census of MDE and RSE pests and diseases for the January and February 2019 periods

2. There is already information about the mouse census and ganoderma

3. Decree of Pest and Disease officer RSE and MDE

Based on root cause analysis, correction, and corrective actions, nonconformities are stated to be fulfilled.

Verified by : **Haikal Ramadhan Kharismansyah**

NCR No.	: 2019.03	Issued by	: Haikal Ramadhan Kharismansyah
Date Issued	: 14 March 2019	Time Limit	: 13 June 2019
NC Grade	: Major	Date of Closing	: 11 May 2019
Standard Ref. & Requirement	4.6.2 Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications) shall be available.		
Evidence observed (filled by auditor): 1. Monitoring the use of pesticide RSE for the period January – December 2018 2. Recapitulation of the Use of MDE Pesticides for the period January - December 2018 3. Cypermethrin use monitoring board to control Oryctes in RSE for the period 2018 and 2019 4. Recapitulation of nettle caterpillar census and control division 1 MDE (October to December 2018 period) - there is use of Achepate)			
Non-Conformance Description (dilengkapi oleh auditor): Recording of the use of pesticides indicated by the Certificate Holder has not fully informed all types of pesticides used. For example the use of Achepate on MDE and Cypermethrin at RSE.			
Root Cause Analysis (filled by organization audited): There is use of pesticides that are not confined to warehouse reports because data on pesticide use especially for pest control have not been included in the agronomic report every month so that they have not been monitored and evaluated.			
Correction (filled by organization audited): Make a recapitulation of the use of pesticides that are applied in the field and determine the PIC, namely agronomic admin so that it will be listed in the agronomic report every month.			
Corrective Action (filled by organization audited): List the use of pesticides in agronomic reports and conduct monthly evaluations of the use of pesticides.			
Assessor Evaluation and Conclusion (filled by auditor): Verification on April 5, 2019 The company shows proof of improvement in the form of: 1. Use of MDE pesticides for 2018 along with information on LD50, total usage, application area, and use of active ingredients / ha. There is information about using achepate			

2. Use of RSE pesticides for the period 2018 along with information on LD50, total usage, application area, and use of active ingredients / ha. There is already information about the use of cypermethrin. Evidence of the submitted repairs can be received, but more information is needed in the root cause analysis, correction, and corrective action. Nonconformities have not been fulfilled.

Verification on May 11, 2019

Information has been added to the root cause analysis, correction, and corrective action. Nonconformities are stated to be fulfilled.

Verified by : **Haikal Ramadhan Kharismansyah**

<i>NCR No.</i>	:	2019.04	<i>Issued by</i>	:	Haikal Ramadhan Kharismansyah
<i>Date Issued</i>	:	14 March 2019	<i>Time Limit</i>	:	13 June 2019
<i>NC Grade</i>	:	Major	<i>Date of Closing</i>	:	11 May 2019
<i>Standard Ref. & Requirement</i>	:	4.6.3 Any use of pesticides shall be minimized as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in Indonesia Best Practice guidelines			
<i>Evidence observed (filled by auditor):</i> 1. Monitoring the use of Cypermethrin MDE for the period January - December 2018 totaling 6,553 liters 2. Oryctes RSE monitoring board - Application of Cypermethrin for D33 blocks (plant age 31 months) C34 (plant life of 27 months); Census December 2018 and January 2019 D33 1.3% and C34 0.5% 3. MRC Training and Socialization to Estate - Oryctes control threshold is if the new attack is $\geq 5\%$. 4. Use of Cypermethrin period 1 March - 11 March 2019 according to the warehouse Stock Opname: - RSE: 180 liters - MDE: 273.40 liters 5. Reference Agronomy Manual for Oil Palm Planting No. Politics: 110 / EST-ARM / 13 in 2013 section 15 concerning Plant Protection, among others, states that heavy infestations in immature oil palm plants need to be subjected to chemical treatment until the plants are 24 months old (once every two weeks). 6. The results of interviews with MDE and RSE assistants stated that the reference for controlling Oryctes in Immature oil palm was ARM					
<i>Non-Conformance Description (dilengkapi oleh auditor):</i> 1. The use of preventive pesticides to control Oryctes carried out by Certificate Holders is not yet equipped with identification of specific situations. 2. Not yet able to show plans and realization of Oryctes control in an integrated management in accordance with the principle of IPM so that it can lead to minimal use of pesticides.					
<i>Root Cause Analysis (filled by organization audited):</i> - There are no special officers who handle integrated pest control - There is no mapping for blocks that must be regularly controlled by pesticides					
<i>Correction (filled by organization audited):</i> - Oryctes pest control by cultivation techniques is carried out by making CECT and chipping when replanting.					

- Re-mapping blocks that are still controlled by spray control Cypermetrin on blocks with border block status, census blocks above the threshold, and preventive blocks (<24 months old).

Corrective Action (filled by organization audited):

Periodically evaluate the results of integrated pest control monitoring and use of pesticides in pest control.

Assessor Evaluation and Conclusion (filled by auditor):
Verification on April 5, 2019

The company shows proof of improvement in the form of:

1. Letter of RSE manager regarding Oryctes control
2. Monitoring the census time of division I, II, and V RSE
3. Memo of the RSE manager for horn beetle; control of horn beetles with preventive cypermetrin up to the age of 24 months. The Barrier Block is still controlled.

But it has not shown proof of improvement in the form of:

1. Horn beetle distribution map for MDE and RSE which informs preventive blocks (Application of pesticides up to 24 months), census blocks (Application of pesticides if there is an attack above the threshold of control), and barrier blocks (block-blocks directly adjacent to the area of attack horn beetle)

Thus the nonconformity is stated to have not been fulfilled. Additional proof of improvement is still needed

Verification on May 11, 2019

It can be shown the map of horn beetle distribution for MDE and RSE which informs the status of the block. In addition, there is also a map of overall pest attacks

Based on the root analysis of the problem, correction, and corrective actions, the nonconformity has been fulfilled.

Verified by : **Haikal Ramdhan Kharismansyah**

NCR No.	:	2019.05	Issued by	:	Mohamad Amarullah
Date Issued	:	14 March 2019	Time Limit	:	13 June 2019
NC Grade	:	Major	Date of Closing	:	10 June 2019
Standard Ref. & Requirement	:	4.7.2. A documented risk assessment shall be available and its implementation shall be recorded.			
Evidence observed (filled by auditor):					
<ul style="list-style-type: none">• HIRAC is not covered all activities in Estate or Mill, for example, there is no HIRAC for boat movement among drainage zone by crane; diesel filling to tugboat.; canal maintenance; WTP chemicals transportation from storage area under loading ramp to WTP Station, etc.• Treceability of HIRAC evaluation is not available.• Risk category assessment (EPR) for HIRAC in Rotan Semelur Estate is not available.• Hazard analysis in Estate HIRAC for pesticide application did not mentioned risk of chemical exposure.• Based on observation to pesticide application activity in Block G027 Mandah Estate and Block D033 Rotan Semelur Estate, it was known that all applicators did not wear goggle and/or Face Shield as required in HIRAC and procedure No. 10x/PTK-PST/2004 Point 3.					
Non-Conformance Description (filled by auditor):					

Company management is not be able to shows that HIRAC has covers all activities in the estate and mill. Furthermore, information provided in HIRAC among units is different between units (not standard) and most likely not comprehensive.

Root Cause Analysis (filled by organization audited):

Currently, HIRAC control and distribution is not centralized managed by PAQM Department. Thus, any units has kept different version.

Correction (filled by organization audited):

- To reinventor and identified all HIRAC for all units in PT BNS, which latter on to be evaluate and standardize, in accordance with HIRAC procedure.
- To distribute latest HIRAC to all units in PT BNS.

Corrective Action (filled by organization audited):

Appointing ESH-PSQM Staff as PIC who responsible to monitor, evaluate, update and distribute latest HIRAC to the estates and mill unit.

Assessor Evaluation and Conclusion (filled by auditor):
Auditor Verification 29 May 2019

Unit management shows latest HIRAC for estate and mill No. 7301/PSQM-ESH/11 dated 14 May 2019 which consist of 21 and 19 operational activities on the estate and mill, respectively. HIRAC on boat movement among drainage zone by crane and diesel filling to tugboat is presented in HIRAC of "operational of tug bot". Treceability and evaluation of HIRAC is mentioned on the latest HIRAC. Furthermore, HIRAC of Pesticide Application has mentioned risk on chemical exposure, as well as its mitigation. However, several correction evidence are not availabel, as follows:

- WTP chemicals transportation from storage area under Loading Ramp Station to WTP Station is not available.
- Evidence that Rotan Semelur Estate has recieve new HIRAC is not available.
- PPE such as goggle or face shield for Pesticide Applicators has been provided by Rotan Semelur Estate management.

According to explanation above, NCR No. 2019.05 is still remain **open**.

Auditor Verification 10 June 2019

- Management unit shows that HIRAC of chemicals transportation to WTP Station is already covers in HIRAC No. 08 about Water Treatment Station on part No. 1 about Chemicals transportation from Warehouse or placement place.
- Management unit shown that distribution of the latest HIRAC is carried out by email to all units on 29 May 2019. Print screen on email is available.
- Management unit shown evidence of PPE delivery to Rotan Semelur Pestidcide Applicators, as well as its socialization to the respective workers which conducted on 18 March 2019. Furthermore, checklist on PPE monitoring dated March 2019 for all Divisions were available. The checklist onformed that goggle was already included on the list of PPE.

According to explanation above, NCR No. 2019.05 is considered **Closed**.

Verified by : **Mohamad Amarullah**

NCR No.	:	2019.06	Issued by	:	Mohamad Amarullah
Date Issued	:	14 March 2019	Time Limit	:	ASA-1.1
NC Grade	:	Minor	Date of Closing	:	13 May 2019
Standard Ref. & Requirement	:	4.7.6 All workers shall be provided with medical care, and covered by accident insurance (see criterion 6.5.3).			

Evidence observed (filled by auditor): Based on review towards agreement with replanting contractor PT Mitra Karya Jaya Perdana No. 012/Replanting/BNS/2018 dated 29 June 2018, it was stated in Article 9 that manpower insurance for contractor workers shall be covered by contractor. However, evidence of registration and payment is not available	
Non-Conformance Description (filled by auditor): company management do not have mechanism to ensure that all contractor workers are covered by accident insurance.	
Root Cause Analysis (filled by organization audited): The company has no system which able to monitor BPJS Manpower payment of contractor workers by the respective contractor.	
Correction (filled by organization audited): <ul style="list-style-type: none"> - To create system that able to monitor BPJS-Manpower payment of contractor workers which will be carried out during invoice payment to contractor. - To shows evidence such as BPJS Manpower Membership Certificate, as well as its monthly BPJS Manpower payment evidence 	
Corrective Action (filled by organization audited): To conduct monitoring on BPJS Manpower Membership of Contractor Workers, every payment invoice date.	
Assessor Evaluation and Conclusion (filled by auditor): Auditor Verification 13 May 2019 Descriptions towards root cause analysis and corrective action are acceptable. Furthermore, several evidence shows by company management is presented as follows: <ul style="list-style-type: none"> • Letter of PT Mitra karya Jaya Perdana (MKJP) Director as replanting contractor to Area Controller of Riau Selatan Region No. 077.MKJP/PKU/IV/2019 dated 13 April 2019 about confirmation towards supporting data of PT MKJP has stated that their workers has been registered on BPJS Manpower. Furthermore, evidence of ongoing registration process for new employee, evidence of BPJS Manpower payment and details of employees wages were describes properly. • Details of BPJS Manpower Payment which presented in Form 2a PU BPJS dated 10 February 2019, 10 March 2019 and 10 April 2019 which informd that 4 workers of PT MKJP has already registered and their BPJS manpower has been paid periodically every month. • PT MKJP for BPJS Manpower Memrbership Certificate No. No. 1200000020841 which issued by BPJS Manpower Director on 12 April 2019 which stated that PT MKJP had been registered as BPJS Manpower member as in accordance with Act No. 24 in 2011 and has also registered on retired insurance since November 2015. Based on root of cause and corrective action review, as well as evidence of correction given, it could be concluded that NCR No. 2019.06 is considered closed .	
Verified by	: Mohamad Amarullah

NCR No.	: 2019.07	Issued by	: Brigitta Prita
Date Issued	: 14 March 2019	Time Limit	: ASA-1.1
NC Grade	: Minor	Date of Closing	:
Standard Ref. & Requirement	: 5.3.3. A documented waste management plan to avoid or reduce pollution and its		

	implementation shall be available
Evidence observed (filled by auditor): Based on field observations are known: <ol style="list-style-type: none"> 1. There is (frond burning activities between coconut tree) Located in Division 4 Block I 026 MDE and around the Office of Division 3 & 4 RSE it is known that there is burning of domestic waste and weeds. 2. The distance of landfill is located near the MDF Housing within less than 50 meters 	
Non-Conformance Description (filled by auditor): Based on the explanation above it is known that: <ol style="list-style-type: none"> 1. Points (1) are not in accordance with the RSPO No 3.62 / Waste No waste management procedure dated January 1st, 2019 in point 5.1 which states that all waste produced by households must be disposed of in a landfill. 2. Point (2) is not in accordance with government regulation No. 81 of 2012 that in article 23 it is stated that the distance of landfill from housing is more than 1 kilometer by considering leachate pollution, odor, spread of disease vectors and social aspects. 	
Root Cause Analysis (filled by organization audited): Burning coconut frond between oil palm carried out by the community because they do not understand the rules about prohibit open burning. As well as workers working at the RSE Offices Division 3 & 4 do not know about the prohibition of burning garbage.	
Correction (filled by organization audited): <ul style="list-style-type: none"> • Installing a signboard prohibits burning forests in the estate area. • Socialization to the community around estate area. • Issued a memorandum related to waste management from the RSE Manager. • Socialization of waste Management Memorandum. 	
Corrective Action (filled by organization audited): <ul style="list-style-type: none"> • The PMU Department will routinely conduct internal assessments related the cleanliness of the environment around workers housing. 	
Assessor Evaluation and Conclusion (filled by auditor): Verification, May 29th 2019. The company shows evidence of improvement as follows: <ol style="list-style-type: none"> 1. Estate Manager Memorandum of RTE No RSE-Int / 177 / IV / 2019 / s dated April 15th, 2019, Regarding: Waste Management to all Assistant and Head of Staff, among others: prohibition of entering waste into RSE plantation areas, prohibition of importing garbage, the prohibition of mixing garbage with hazardous waste, the prohibition on managing waste that causes pollution, the prohibition of disposing of waste improperly, the prohibition of handling waste by open dumping at the place of final scraping and / or burning waste that is not in accordance with the technical requirements of waste management. 2. Socialization of the prohibition on burning garbage to Head of Sub-Village, security guards, and the community around Mandah Estate on May 18th, 2019 attended by 13 people. 3. Socialization of waste management at the RSE Division 3 & 4 Hospital in March 19th, 2019, especially the ban on burning garbage, followed by 24 workers. 	
Auditor conclusion: The root cause of analysis, correction and corrective action have not been shown related to the location of the landfill which is <50 meters from the housing. It's still open.	

Verified by	:	Trismadi N
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NCR No.	:	2019.08	Issued by	:	Mohamad Amarullah
Date Issued	:	14 March 2019	Time Limit	:	13 June 2019
NC Grade	:	Major	Date of Closing	:	13 May 2019
Standard Ref. & Requirement	:	6.5.1 Documentation of pay and conditions for employees based on the existing manpower regulations shall be available.			
Evidence observed (filled by auditor): based on review towards work agreement with replanting contractor, for example with PT Mitra Karya Jaya Perdana which presented in Contract No. 012/Replanting/BNS/2018 dated 29 June 2018, it was known that article mentioning minimum wages payment for contractor workers is not available.					
Non-Conformance Description (filled by auditor): company management has no mechanism to ensure that all contractor workers are paid in accordance with applicable regulation.					
Root Cause Analysis (filled by organization audited): The company has no system of monitoring which aim to ensure salary payment of contractor workers is in accordance with applicable regulation.					
Correction (filled by organization audited): <ul style="list-style-type: none"> - To create system that able to monitor salary payment of f contractor workers which will be carried out during invoice payment to contractor. - To shows evidence that salary payment of contractor workers is in accordance with applicable regulation. 					
Corrective Action (filled by organization audited): <ul style="list-style-type: none"> - To conduct monitoring on salary payment of Contractor Workers, every payment invoice date. - Clause and point of applicable minimum wages regulation pursuance will be added on the next work agreement with contractor. 					
Assessor Evaluation and Conclusion (filled by auditor): Auditor Verification 13 May 2019 Descriptions towards root cause analysis and corrective action are acceptable. Furthermore, management unit is able to shows evidence of salary payment that presented in Form 2a PU BPJS Manpower dated 10 February, 10 March 2019 and 10 April 2019 which informed that all contractor workers salary registered are more that minimum wages of Indragiri Hilir Regency, or more that IDR 2,750,618.96 per month. Based on root of cause and corrective action review, as well as evidence of correction given, it could be concluded that NCR No. 2019.08 is considered closed .					
Verified by	:	Mohamad Amarullah			

NCR No.	:	2019.09	Issued by	:	Brigitta Prita
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<i>Date Issued</i>	: 14 Maret 2019	<i>Time Limit</i>	: ASA-1.1
<i>NC Grade</i>	: Major	<i>Date of Closing</i>	:
<i>Standard Ref. & Requirement</i>	7.3.1. There shall be evidence that no new plantings have replaced primary forest, or any area required to maintain or enhance one or more High Conservation Values (HCVs), since November 2005. New plantings shall be planned and managed to best ensure the HCVs identified are maintained and/or enhanced (see Criterion 5.2).		
Evidence observed (filled by auditor): The company shows RaCP of PT BNS process with the following details: <ul style="list-style-type: none"> • Liability and disclosure to RSPO on December 2nd, 2014. • LUCA was sent on December 12th, 2017 and shape files submission to RSPO on August 27th, 2018. Rotan Semelur Estate: <ul style="list-style-type: none"> - Time of clearance Nov 05 - Nov 07 (Ha) covering an area of 135.15 Ha. - Time of clearance Dec 07 - Dec 09 (Ha) covering an area of 18.12 Ha. • Concept notes was sent to RSPO on March 25th, 2016 and responded on December 5th, 2016. • RSPO Compensation panel dated November 12th, 2017, states that the RaCP is still in process. <p>Based on communication between PT Mutuagung Lestari and RSPO February 13th, 2019, information was obtained that "A preliminary review of the compensation plan has been done. However, no further action can be taken because the LUCA is still awaiting finalization and its pending clarification from Sime Darby ". In this regard, the company has not been able to show that the RaCP compensation plan has been approved by the RSPO.</p>			
Non-Conformance Description (filled by auditor): The company has not been able to show evidence that the RaCP compensation plan has been approved by the RSPO.			
Root Cause Analysis (filled by organization audited): The unit has not received information from Sime Darby regarding the progress of LUCA PT BNS.			
Correction (filled by organization audited): The time line check list of the LUCA Sime Darby submission checklist (attached file) has been submitted.			
Corrective Action (filled by organization audited): Continue to update to Sime Darby to communicate the progress of the LUCA PT BNS progress.			
Assessor Evaluation and Conclusion (filled by auditor): Verification, May 27th, 2019. The company has shown evidence of communication with the RSPO Secretariat on May 9 th , 2019 which informed that a meeting had been held with the RSPO on May 8 th , 2019, at the meeting agreed: "Considering the historical involvement and events (as presentation slides and documents attached), SDP is given a one year time extension period to address all outstanding matters (including the approval of compensation plan) related to non-conformity raised on 7.3.1 during the RSPO Re-certification/Annual Surveillance Audits for the affected units. (The timeframe of one year whether from May 2019 or maybe staggered according to the certification dates of each Unit of Certification will be advised by RSPO Secretariat Based on an email from RSPO (aminah.ang@rspo.org) dated May 23 rd , 2019, it is known that "The RSPO secretariat has been agreed to allow the NC to be raised on 7.3.1 to Sime Darby's open units until the next ASA" so that the non-conformity indicator 7.3 .1 stated has not been fulfilled.			

Verified by	: Brigitta Prita
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NCR No.	: 2019.10	Issued by	: Brigitta Prita
Date Issued	: 14 March 2019	Time Limit	: 13 June 2019
NC Grade	: Major	Date of Closing	: 1 April 2019
Standard Ref. & Requirement	5.5.2 Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following: a. The site has legal ownership of all input material to be included in outsourced processes; b. The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary. c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. d. The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance.		
Evidence observed (filled by auditor): Based on document verification sighted that all RSPO Certified products transport are using third parties, such as: PT Trans Samudera Mandiri, PT Sinar Pagoda Services, PT Transindo Bahari Perkasa, PT Mitsi Citra Mandiri, and PT Pelayaran KJ Marine. There were an agreement dated 7 May 2018 stating that PT Trans Samudera Mandiri & PT Mitsi Citra Mandiri were willing to be accessed by the Certification Body related to the implementation of RSPO standards.			
Non-Conformance Description (dilengkapi oleh auditor): The company has not been able to show evidences that all third parties who handling the RSPO Certified products are willing to be accessible by the RSPO Certification Body.			
Root Cause Analysis (filled by organization audited): The transport agreement has not been carried out according to the required clauses related to the certification body need access to the contractor.			
Correction (filled by organization audited): Showing all of agreement on CSPO & CSPK transportation that state the certification bodies can check directly into the transporter to verify the data.			
Corrective Action (filled by organization audited): Coordination with Legal department to be able added the clause in each new agreement between PT BNS and transporters.			
Assessor Evaluation and Conclusion (filled by auditor): Verification on 1 April 2019 The company was show several evidence as follows: 1. Agreement number 016/BNS-MDF/III/2019 dated 11 March 2019 with PT Pelayaran Sinar Pagoda for CPO & PK transportation. It was explained that the transporters were willing to be accessed/audit directly by the certification bodies. 2. Agreement number 017/BNS-MDF/III/2019 dated 11 March 2019 with PT Pelayaran KJfor CPO & PK transportation. It was explained that the transporters were willing to be accessed/audit directly by the			

certification bodies.

3. Agreement number 018/BNS-MDF/III/2019 dated 11 March 2019 with PT Transindo Bahari Perkasa for CPO & PK transportation. It was explained that the transporters were willing to be accessed/audit directly by the certification bodies.

Based on above evidences that have been shown, this non conformities has been closed.

Verified by : **Brigitta Prita**

NCR No.	: 2019.11	Issued by	: Brigitta Prita
Date Issued	: 14 March 2019	Time Limit	: 13 June 2019
NC Grade	: Major	Date of Closing	: 1 April 2019
Standard Ref. & Requirement	: 5.7.2 The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform: <ul style="list-style-type: none"> • Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures. • Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually. • Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed. • Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements. 		

Evidence observed (filled by auditor):

The Mandah POM shows several records of transactions in the RSPO Palm Trace for the period of March 2018 until February 2019 as follows:

Products	Shipping Announcement (MT)	Remove (MT)	Credit Allocations (MT)	Remaining Volume (MT)
CSPO	9,798.98		13,400	76.02
CSPK	2,734.82		0	2,325.18

While based on the balance sheet data/record keeping with the same period, there are sales as follows:

Products	Claim RSPO (MT)	Conventional (MT)
CSPO	9,008.93	9,812.52
CSPK	617.33	3,366.56

Based on above data, there are variance data between palm trace and record keeping on MDF.

Non-Conformance Description (dilengkapi oleh auditor):

Mandah POM has not been able to show the regularly CSPO & CSPK transaction has been registered on the palm trace.

Root Cause Analysis (filled by organization audited):

All RSPO Certified product sales has been registered on the RSPO Palm Trace, however for conventional sales status has not been removed due to credit allocation of 13,400 MT. It caused insufficient remaining volume to remove as 9,812 MT. Therefore it has not been carried out periodically volume and sales verification between MDF with Marketing Department in Jakarta.

Correction (filled by organization audited):

- SCCS in charge will verified data in the MDF and Marketing Department, then updates the data in the RSPO Palm Trace according to the volume and sales status (Claim RSPO or Conventional). Therefore it will remove for conventional sales.
- Showing the updated mass balance data.

Corrective Action (filled by organization audited):

- SCCS in charge in MDF will periodically communication or verify by email (quarterly) with the Marketing Department is related to the status and volume of sales on the palm trace.
- Marketing Department will coordination with the MDF in determining the volume of credit allocation based on the production of RSPO Certified.

Assessor Evaluation and Conclusion (filled by auditor):
Verification on 1 April 2019

The company shows several evidences as follows:

1. During 12 month period there were sales of CSPO: 9,020.73 MT and sales of CSPK: 617.33 MT. Each of shipping announcement has been recorded on the palm trace.
2. CSPO sales as conventional has been removed: 9,812.56 MT and CSPK sales as conventional has been removed: 3,366.56 MT.

Based on above evidences, this non conformities has been closed.

Verified by : **Brigitta Prita**

<i>NCR No.</i>	: 2019.12	<i>Issued by</i>	: Brigitta Prita
<i>Date Issued</i>	: 14 March 2019	<i>Time Limit</i>	: 13 June 2019
<i>NC Grade</i>	: Major	<i>Date of Closing</i>	: 1 April 2019
<i>Standard Ref. & Requirement</i>	: 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		
<i>Evidence observed (filled by auditor):</i> The Mandah POM shows several records of transactions in the RSPO Palm Trace for the period of March 2018 until February 2019 as follows:			

Products	Shipping Announcement (MT)	Remove (MT)	Credit Allocations (MT)	Remaining Volume (MT)
CSPO	9,798.98		13,400	76.02
CSPK	2,734.82		0	2,325.18

While based on the balance sheet data/record keeping with the same period, there are sales as follows:

Products	Claim RSPO (MT)	Conventional (MT)
CSPO	9,008.93	9,812.52
CSPK	617.33	3,366.56

Based on above data, there are variance data between palm trace and record keeping on MDF.

Non-Conformance Description *(dilengkapi oleh auditor):*

Mandah POM has not been able to show evidence that it has maintained up to date data, both data in palm trace and actually in the MDF.

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

All RSPO Certified product sales has been registered on the RSPO Palm Trace, however for conventional sales status has not been removed due to credit allocation of 13,400 MT. It caused insufficient remaining volume to remove as 9,812 MT. Therefore it has not been carried out periodically volume and sales verification between MDF with Marketing Department in Jakarta.

Correction *(filled by organization audited):*

- SCCS in charge will verified data in the MDF and Marketing Department, then updates the data in the RSPO Palm Trace according to the volume and sales status (Claim RSPO or Conventional). Therefore it will remove for conventional sales.
- Showing the updated mass balance data.

Corrective Action *(filled by organization audited):*

- SCCS in charge in MDF will periodically communication or verify by email (quarterly) with the Marketing Department is related to the status and volume of sales on the palm trace.
- Marketing Department will coordination with the MDF in determining the volume of credit allocation based on the production of RSPO Certified.

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

Verification on 1 April 2019

The company shows several evidences as follows:

1. During 12 month period there were sales of CSPO: 9,020.73 MT and sales of CSPK: 617.33 MT. Each of shopping announcement has been recorded on the palm trace.
2. CSPO sales as conventional has been removed: 9,812.56 MT and CSPK sales as conventional has been removed: 3,366.56 MT.

Based on above evidences, this non conformities has been closed.

Verified by : **Brigitta Prita**

3.5.3 Opportunity for Improvement

No	Ref. Std.	Description
1	Minor 1.3.1	The company is encouraged to routinely disseminate codes of ethics (updates) to employees and contractors who work with companies.
2	4.8.1 Major	Company management is encourage to conduct monitoring evaluation of training realization progress againts the annual training program
3	6.5.2 Major	The company is encouraged to monitor the progress of the appointment of <i>PKWT</i> (contract worker) employees into <i>SKU</i> (permanent worker)
4	6.5.3 minor	The company has the opportunity to ensure that the Contractor has provide a proper living space (house or barrack) for their workers, as mentioned in Work Agreement Article 2 Point 2.5.
5	D.4.1	During the audit activity on March 15, 2019. The management unit was showed an email requesting the addition of CSPO & CSPK quotas to the Certification Body. However, the company to be consider to evaluate reported mechanism.
6	RSPO Certification System point 4.5.3.	Sime Darby Plantations to be consider to update the Time Bound Plan and Justifying the changes.

1.5.4. Noteworthy Positive Components

No	Description
1	Commitment to implement the principles of sustainable palm oil plantation management.



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

Public Issues (Institution/ NGO/Community)	Auditor Responses
<p>Teluk Bunian Village, Sub-Village of Parit Gurah Baru</p> <ul style="list-style-type: none"> - The company has a good relationship with the surrounding communities. - The company has realized the CSR during last year, for example: shuttle boat for children from the village to the school. - The company has conveyed information related to employment opportunities. However the majority of people prefer to work in their own fields. - The company has informed about opportunities for outsourced activities, such as: pruning and planting activities. - The company has carried out socialization to the communities regarding the emergency response for fire. In addition, the company has also formed a partnership of the Fire Care Society (<i>Masyarakat Peduli Api</i>). - There are no issues regarding fire and environment pollution during last year. <p>Aspirations:</p> <ul style="list-style-type: none"> - The communities has submitted proposal to the company on the middle-2018, related to the trenches washing from Km 0 to Km 3. As well as repair of sluice gates, however until now there has not been official response from the company. There are only informal answers by the phone. 	<ul style="list-style-type: none"> - The company has been realized CSR program its according with indicator 6.11. Beside that, the company has given information to stakeholders related job opportunities. - Based on verification with the management sighted that the proposal should get approval from the CEO. While the company has responded with a letter to the communities regarding this cases.
<p>Head of Industrial Relations Disputes & Work Terms, of Manpower Agency of Indragiri Hilir District.</p> <ul style="list-style-type: none"> - There is a tripartite meeting on 14 December 2018, it was discussing the status of temporary workers (PKWT) in TBF; evaluation of harvesting and transportations premiums policy for all estates unit. The problem resolutions will be carried out with a maximum deadline of three month from 17 December 2018 or until 18 March 2019. - If all of the agreements has not been realized until 18 March 2019, the mediator (government) will recall all representative from both of parties. To formulate an agreement that produces with a win-win solution. - However, if there is no agreement in the next meeting, a recommendation will be issued toward the Industrial Relations Disputes. - In the period of 2018/2019 there are no AKAD (<i>Penempatan Antar Daerah</i>) workers. - All permanent workers and temporary workers has been registered on the insurance (workers and health), in addition 	<ul style="list-style-type: none"> - The company shows minutes of tripartite meetings signed by each Chairperson of the work unit managements, Board of Indragiri Hilir District Workers Union, Company Representative and Industrial Relations Mediator dated 16 November 2018 and dated 14 December 2018. - Inter Office Mail number 457/BNS-MDF/12/2018 dated 18 December 2018 from MDF Manager to the Area Controller of Riau Selatan, concerning: proposal for appointment of 18 persons temporary worker from MDF. The letter was approved by Area Controller, Chief Engineering, and Chief Executive Officer dated 6 February 2019. - Minute of Bipartite Meeting between company and worker union from each units dated 13 March 2019. There are several agreement as follows: <ul style="list-style-type: none"> 1. Evaluation and re-checking the differences in premium treatment of transport and boat operators in all units of PT BNS.

Public Issues (Institution/ NGO/Community)	Auditor Responses
<p>the company also registered its employee in the Manulife Insurance.</p> <p>The company is currently still referring to the Sector Minimum Wage for Riau Province year of 2018. It cause the UMSP of 2019 is still under negotiations between GAPKI and workers union at the province level. However they usually will pay on April, after the Governor Decree Letter issued.</p>	<p>2. The fixed weight harvesting system is still implemented in all estates.</p> <p>Non harvesting premium will be discussed after discussion with CEO Region.</p>
<p>Head of Supervision, the Environment Agency of Indragiri Hilir District</p> <ul style="list-style-type: none"> - The latest supervision was carried out on August 2018, at the time there was a note regarding the delay in reporting of <i>RKL/RPL</i>. However the company was reported on September 2018. - The company has reported quarterly reports on effluent management. - The company has reported quarterly report on hazardous waste management. - There are no complaints about environment pollution and fire. 	<p>The company has environment permit, report management & monitoring of environment has been according with matri <i>RKL/RPL</i>. The company has regurlaly sent mandatory report and according with indicator 1.1.1.</p>
<p>OHS Norm Supervision of Man Power Agency of Riau Province.</p> <ul style="list-style-type: none"> - There has not been violated of OHS norm by company during last year. - Machineries inspection and testing on TBF and MDF has been carried out in 2018. - The company has reported quarterly report on OHS Committee. - The company has reported annual report of Manpower. 	<ul style="list-style-type: none"> - It has been complied with criteria 1.1; 2.1 and 4.7. <p>The company has regurlaly sent mandatory report and according with indicator 1.1.1.</p>
<p>Chairpersons of DPC SPPP-SPSI Indragiri Hilir District</p> <ul style="list-style-type: none"> - If the company has not been able to appoint all temporary workers at the same time, it's hoped that they can be appointed gradually and not terminated. Especially for the temporary workers who have worked more than 3 years. - The agreement between GAPKI and Worker Unions related to UMSP has existed, that only waiting for the issued by the Riau Governor. - Renewal of CLA is still on negotiations process, currently is still using CLA period of 2015 to 2017. - It's hopefully there will be no more temporary harvesters. 	<ul style="list-style-type: none"> - It has been complied with criteria 6.5; 6.6 and 6.8.
<p>Management of the Gender Committee Mandah Estate</p> <p>Policies regarding the handling of sexual harassment have been submitted to the management and then submitted to female workers. So far there has never been an incident or reporting on sexual harassment. Workers have been told related the</p>	<p>The company has implemented criteria 6.9 regarding no abuse or abusive treatment in the workplace and reproductive rights.</p>

Public Issues (Institution/ NGO/Community)	Auditor Responses
<p>mechanism in the event of an incident and the reporter is protected by anonymity by the gender committee.</p> <p>Female workers have been told about reproductive policies, each female workers gets H1 leave with rest for 2 days and gets H2 leave as much as 1^{1/2} months before and after childbirth. Activities carried out by the gender committee include religious activities, sports, Integrated Health Post and others.</p>	<p>The company has protected the reproduction rights in accordance with the Collective Labor Agreement.</p>
<p>Management of Gender committee of Mandah POM</p> <p>During now, there have never been reports of sexual harassment, female workers have known mechanisms regarding gender committee policies or if sexual harassment occurs. Routine activities carried out by gender committees such as religious activities, social gathering, sports and etc. In addition, for workers there has been a socialization regarding the use of fire extinguisher</p>	<p>The company has implemented criteria 6.9 regarding no abuse or abusive treatment in the workplace and reproductive rights.</p>
<p>Head of labor union Mandah Estate</p> <p>On December 14th, 2018 there was a letter from the meeting between the Manpower and Transmigration Agency of Indragiri Hilir and BNS & labor union regarding evaluation of harvester premium, transport and the premium policy issued by the Area Controller applies to all PT BNS Estate units.</p> <p>Based on interview it's known that the policy had been implemented since January 2019, for example, the transport premiums at MDE had been adjusted to IDR 3000 per ton with a base of 2 tons. Then for harvesters, no longer quoting loose leaves and handed over to the maintenance department and counted work days for 200 kg. Non-Harvest premiums, for example Fertilizers are calculated as IDR 75 /kg. Security guards are counted overtime not using the premium system anymore.</p> <p>The company participates in facilitating labor union activities such as transportation, official travel expenses and etc. Every complaint from labor union is responded by the company such as providing clean water during the dry season.</p> <p>The latest collective labor agreement (2019) is still in the process so that now it still uses the old CLA. Internal meetings are held every 1 month. Wages for 2019 period are paid on salaries in April 2019. So from January to now it still uses 2018 salaries of IDR 2,481,000. The total members of labor union are 294 workers for Mandah Estate.</p>	<p>The company has made premium adjustments in accordance with applicable regulations. Calculation of overtime for security workers has been adjusted to the applicable regulations.</p> <p>The company has facilitated labor union activities in accordance with criterion 5.4.</p>

Public Issues (Institution/ NGO/Community)	Auditor Responses
<p>Head of Labor Union Mandah POM</p> <p>The Labor union management consisted of 4 workers consisting of 89 members of the Mandah Factory. Complaints from Mandah workers regarding the status of Contract workers as many as 18 people are still in the process of being appointed as permanent workers. The Chairperson of labor union had asked this question to the Head of the Office in Factory, based on interview its known that they were still waiting a decision from the relevant management.</p> <p>The latest CLA (2019) is still in the process so that now it still uses the old CLA. Wages for 2019 period are paid on salaries in April, 2019. So that from January to now it still uses 2018 salaries of IDR 2,481,000.</p>	<p>This Contract workers is in the process of being permanent workers by the company. In this year there will be appointments for all contract workers at Mandah Factory.</p> <p>The company still uses the old CLA and still awaiting approval from the relevant management.</p>
<p>Contractor of PT Surya Max (supervisor foreman).</p> <p>Contractors is from Medan area consist of 4 members. The work agreement and evidence of work payment are kept by the Chairman of PT Surya Max. Work carried out such as maintenance of turbine engines, boilers and others with a period of work from February 7th, 2019 to May 2019. PPE is provided by PT Surya Max, such as helmets, safety shoes, and etc. workers have obtained insurance for Health and Employment.</p> <p>The company provides housing for contractors located in Mill. Clean water and electricity are available.</p>	<p>The company has facilitated contractors by providing housing, clean water, electricity and food sources.</p>
<p>Replanting Contractor of PT Mitra Karya Jaya Perdana</p> <p>Cooperation agreement from 2019-2021, a copy of the contract held by the contractor and the company; payment is paid every month on time. There have been OHS & Hazardous waste socializations. PT MKJP workers have been registered in insurance for Health and Employment, there are 27 operators who already have heavy equipment expert. PPE is provided by contractors such as helmets, safety shoes and gloves.</p>	<p>The company has facilitated contractors by providing housing, clean water, electricity and food sources.</p>
<p>Local contractor for maintenance (prunning) of Pelangiran Village</p> <p>Cooperation agreements with contractors are carried out every 1 month, payments are made on time and in accordance with the employment contract. PPE is provided by local contractors. OHS socialization has been carried out by the company to local contractors.</p>	<p>The cooperative relationship between the Company and the contractor is going well. The company participated in socializing PPE & OHS to contractors.</p>

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY
4.1	<p>Formal Sign-off of Assessment Findings</p> <p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;"> <p>PT Bhumireksa Nusasejati Head of Sustainability – Minamas Indonesia</p>  <p><u>Alagendran Maniam</u> Monday, 10 June 2019</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><u>Trismadi Nurbayuto</u> Monday, 10 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.	Gurah Baru Hamlet, Teluk Bunian Village, Mandah Sub-District.	Teluk Bunian Village, Mandah Sub-District.	-	Interview	12 March 2019	√	-
2.	Chairpersons of DPC SPPP-SPSI Indragiri Hilir District	Tembilahan, Indragiri Hilir District	phone	Interview	12 March 2019	√	-
3.	Head of Supervision, the Environment Agency of Indragiri Hilir District	Tembilahan, Indragiri Hilir District	phone	Interview	12 March 2019	√	-
4.	Head of Industrial Relations Disputes & Work Terms, of Manpower Agency of Indragiri Hilir District.	Tembilahan, Indragiri Hilir District	phone	Interview	12 March 2019	√	-
5.	OHS Norm Supervision of Man Power Agency of Riau Province.	Tembilahan, Indragiri Hilir District	phone	Interview	12 March 2019	√	-
6.	11 Previous Land Owners on Teluk Bunian Village, Mandah Sub-District.	Teluk Bunian Village, Mandah Sub-District.	-	Interview	12 March 2019	√	-
7.	MDF - 1 weighbridge operator - 1 security - 2 overhead crane operator	Teluk Bunian Village, Mandah Sub-District.	-	Interview	12 March 2019	√	-
8	MDE - 4 Circle and Path Spraying worker - 3 Manuring worker - 1 Harvester - 1 Water Level officer	Teluk Bunian Village, Mandah Sub-District.	-	Interview	12 March 2019	√	-
9	RSE - 5 Circle and Path Spraying worker - 3 Manuring worker - 2 Harvester - 3 Manual circle maintenance worker	Teluk Bunian Village, Mandah Sub-District.	-	Interview	13 March 2019	√	-
10	Jaringan Masyarakat Gambut	-	-	Questionnaire	5 March 2019	-	√
11	Sawit Watch	-	-	Questionnaire	5 March 2019	-	√
12	WWF	-	-	Questionnaire	5 March	-	√

					2019		
13	WALHI	-	-	Questionnaire	5 March 2019	-	√

Appendix 2. Assessment Program

DATE	11 to 16 March 2019	
PLANNED TIM	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 11 March 2019		
06.00 – 08.00	Travelling from Jakarta to Batam	TNB/MAH/BRP/HRK
09.00 – 15.00	Travelling from Batam Airport to PT BNS	All Auditor Team
15.30 – 16.30	Opening Meeting: <ul style="list-style-type: none"> Auditee Speech (Introduction of PIC, Profile of Mill and Estates Management Unit). Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Determine of Field Visit Audit, Transparency and Confidentiality Clarification). 	All Auditor Team All Auditor Team
16.30 -17.00	<ul style="list-style-type: none"> Review of Previous Visit Non-conformance (ASA 04 RSPO & ASA-1 ISPO), Partial & Time Bound Plan verification Document Verification: Basic Information 	All Auditor Team
Tuesday, 12 March 2019		
08.00 – 12.00	<ul style="list-style-type: none"> Public consultation to Government Agency by phone. Public consultation to surrounding communities & local contractor (if any) Public consultation to internal stakeholder (worker union, gender committee, cooperation) & contractor 	TNB TNB BRP
08.00 – 12.00	Field Observation at Mandah Estate:	HRK
	• Activities of Harvesting & Transportation, Fertilize, Pesticides Application, canal Maintenance and Biological Control Monitoring	HRK
	• Landfill, Fire Control Facilities (simulation), Chemical Storage, Fertilizer Storage, Hazardous Waste Storage and workshop	MAH
	• Housing, School, Worship Place, Clinic, generator room and Reservoir	MAH
	• Land Use, Legal Boundaries, HCV/ conservation area	MAH
12.00 – 14.00	Break	All Auditor Team
14.00 – 17.00	Field Observation to Mandah POM: <ul style="list-style-type: none"> Security post, WB, , laboratory, SCCS Loading ramp, processing station, engine room, boiler, workshop, Hydrant simulation Housing, health clinic, clean water, etc Drainage, solid waste, Hazardous storage, Hazardous Waste Storage, WTP, WWTP 	TNB/ BRP MAH HRK BRP
Wednesday, 13 March 2019		
08.00 - 12.00	Field Observation at Rotan Semelur Estate:	All Auditor Team
	• Activities of Harvesting & Transportation, Fertilize, Pesticides Application, canal Maintenance, Biological Control Monitoring	HRK

	<ul style="list-style-type: none"> • Waste management, Fire Control Facilities (simulation), Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, workshop 	BRP
	<ul style="list-style-type: none"> • Housing, School, Worship Place, Clinic, generator room, Reservoir 	MAH
	<ul style="list-style-type: none"> • Land Use, Legal Boundaries, HCV/ conservation area 	TNB
12.00 -14.00	Break.	All Auditor Team
14.00 -17.00	Document Verification: <ul style="list-style-type: none"> - Basic Information (clarification) - Legal Demarcation Aspect (Inspection of Legal Boundary Stones, Community Buffer Area/Enclave) - SCCS - Agronomy (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) - Occupational Health & Safety Aspect (PPE Used in Harvest, Manure & Pesticide Application) and Worker Welfare. - Worker's Facilities Aspect (Housing, Daycare, Sports Facilities, Employees Meeting Hall, Sanitary Facilities) & Fire Control Facilities, Waste Management) - Environmental/Conservation Aspect (Inspection of HCV Identified Area, Riparian/Waterways Zone, Reservoir, Forest Area, Peat Area (Water management, etc), Chemical Storage, Fertilizer Storage, Hazardous Waste Storage. 	All Auditor Team
Thursday, 14 March 2019		
08.00 – 12.00	Clarification of Field Observation & Completing of Check List.	All Auditor Team
12.00 – 14.00	<ul style="list-style-type: none"> • Break. 	All Auditor Team
14.00 – 15.00	<ul style="list-style-type: none"> • Interim meeting (preparation for closing meeting) 	All Auditor Team
15.00 – 17.00	<ul style="list-style-type: none"> • Closing Meeting. 	All Auditor Team
Friday, 15 March 2019		
08.00 – 14.00	Travelling from PT BNS to Batam.	All Auditor Team
15.30 - 16.40 -	Travelling from Batam to Jakarta. Travelling from Batam to Jakarta.	All Auditor Team