

Roundtable on Sustainable Palm Oil Certification
R S P O

[✓] Surveillance

Name of Management : Pembangunan Raya Palm Oil Mill – PT Agro Sejahtera Manunggal,
Organisation Bumitama Agri Ltd

Plantation Name : PT Agro Sejahtera Manunggal: Pembangunan Raya Estate, Belaban Raya
Estate, Bengkuang Raya Estate, Cooperative Agro Seriam Mandiri

Location : Seriam Village, Kendawangan Sub District, Ketapang District, Kalimantan
Barat Province, Indonesia

Certificate Code : **MUTU-RSPO/126**

Date of Certificate Issue : 25 March 2019 Date of License Issue : 25 May 2020

Date of Certificate Expiry : 24 March 2024 Date of License Expiry : 24 March 2021

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-1	27 to 31 January 2020	Trismadi Nurbayuto (Lead Auditor), Brigitta Prita, Satria Adi Putra, Johannes Kapri Pandiangan (Observer)	Octo H. P. N. Nainggolan	Ardiansyah

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-1	13 May 2020

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Figure 1. Location Map of PT Agro Sejahtera Manunggal

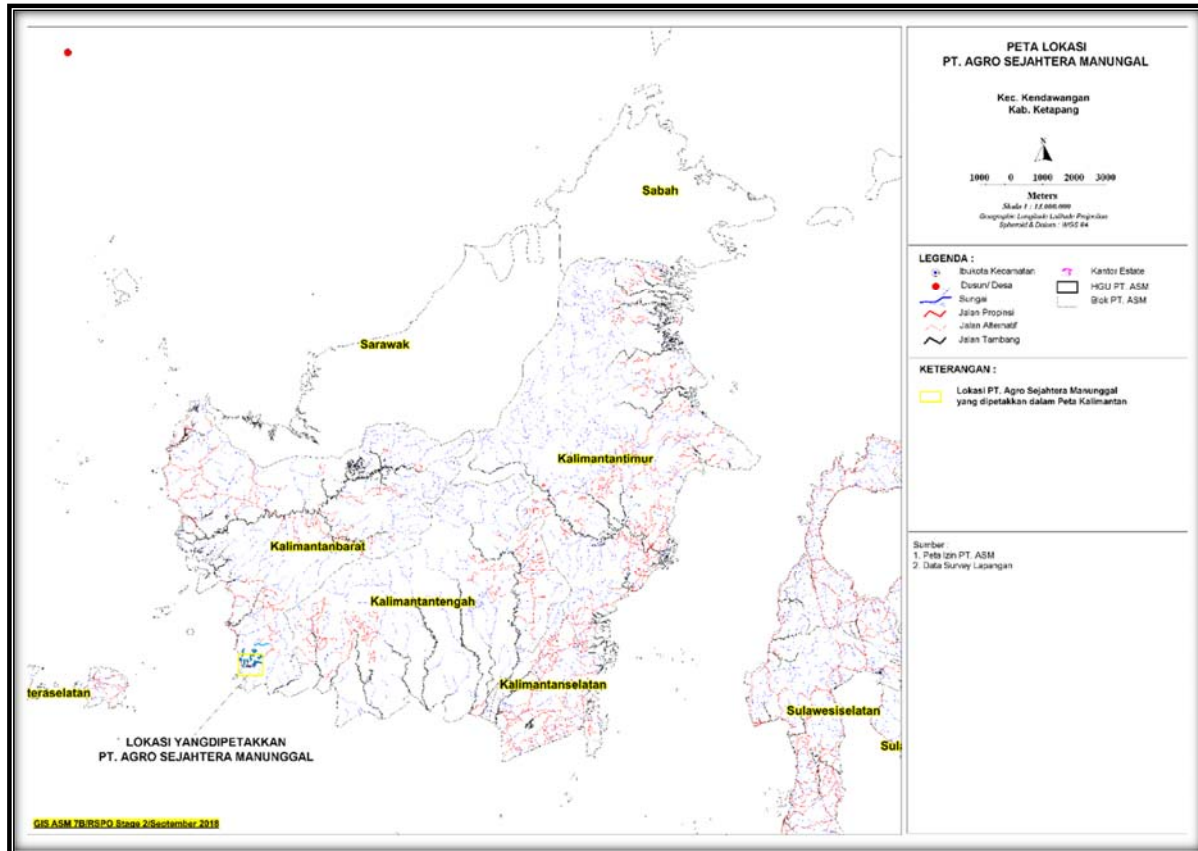
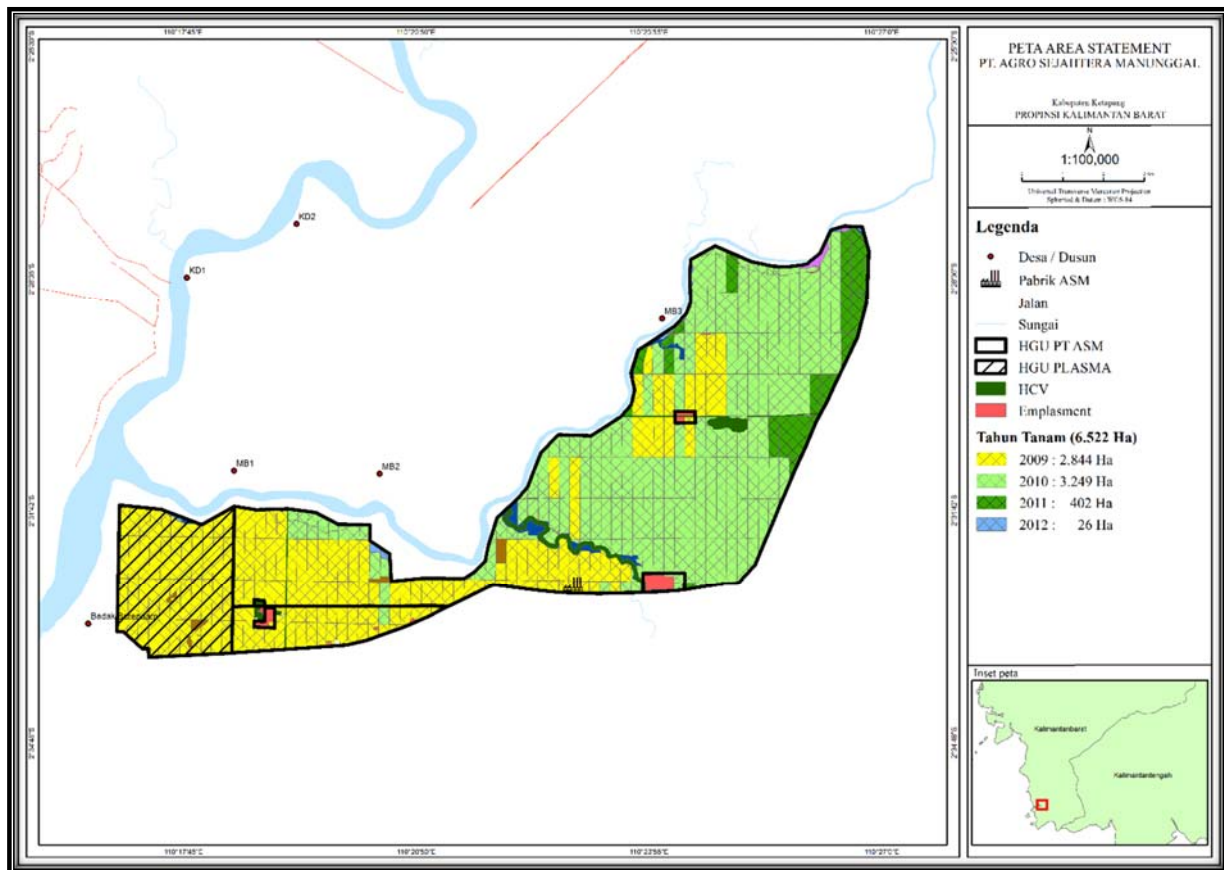


Figure 2. Operational Map of PT Agro Sejahtera Manunggal



Abbreviations Used

AMDAL	:	<i>Analisis Mengenai Dampak Lingkungan</i> (Environmental Impact Assessment)
APD / PPE	:	<i>Alat Pelindungan Diri</i> (Personal Protection Equipment)
APL	:	<i>Area Penggunaan Lain</i> (Other Land Used)
ASA	:	Annual Surveillance Assessment
ASEAN	:	Association of South East Asian Nations
ASM	:	Agro Sejahtera Manunggal
BGA	:	Bumitama Gunajaya Agro
BHS	:	BGA Harvesting System
BLRE	:	Belaban Raya Estate
BMS	:	BGA Manuring System
BOD	:	Biological Oxygen Demand
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i> /Social Insurance
BPN	:	<i>Badan Pertanahan Nasional</i> /National Land Agency
BRYE	:	Bengkuang Raya Estate
BSS	:	BGA spraying System
CH	:	Certificate Holders
CLA	:	Collective Labour Agreement
CPO	:	Crude Palm Oil
CSPK	:	Certified Sustainable Palm Kernel
CSPO	:	Certified Sustainable Palm Oil
CSR	:	Corporate Social Responsibility
CV	:	<i>Commanditaire Vennootschap</i> /Small business enterprise
D&L	:	Document & Legal
EFB	:	Empty Fruit Bunch
ETP	:	Effluent Treatment Plant
FFB	:	Fresh Fruit Bunch
FPIC	:	Free, Prior, Inform, Consent
GHG	:	Green House Gass
GHL	:	Gunajaya Harapan Lestari
GKS	:	Gunajaya Ketapang Sentosa
HCV	:	High Conservation Value
HIRAC	:	Hazard Identification Risk Assessment & Control
HO	:	Head Office
IPM	:	Integrated Pest Management
ISPO	:	Indonesian Sustainable Palm Oil
KER	:	Kernel Extraction Rate
MCU	:	Medical Check Up
MoU	:	Memorandum of Understanding
MSDS	:	Material Safety Data Sheet
NGO	:	Non Government Organization
OHS	:	Occupational, Health and Safety
OER	:	Oil Extraction Rate
PAD	:	Public Affairs Department
P2K3	:	<i>Panitia Pembina Kesehatan Keselamatan Kerja</i>
PIC	:	Person In Charge
PK	:	Palm Kernel
PP	:	<i>Peraturan Perusahaan</i>

PPE	:	Personal Protection Equipment
PRYE	:	Pembangunan Raya Estate
PRYM	:	Pembangunan Raya Mill
PTH	:	<i>Pekerja Tetap Harian/</i> Daily Permanent Worker
PTT	:	<i>Pekerja Tidak Tetap/</i> Free Labour
QA	:	Quality Assurance
RKL/RPL	:	<i>Rencana kelola lingkungan/ Rencana pemantauan lingkungan</i>
RSPO	:	Roundtable on Sustainable Palm Oil
SAE	:	Society of Automotive Engineers
SCCS	:	Supply Chain Certification System
SEIA	:	Social Environmental Impact Assessment
SIA	:	Social Impact Assessment
SMK3	:	<i>Sistem Manajemen Kesehatan, Keselamatan, Kerja</i>
UKL/UPL	:	<i>Upaya Kelola Lingkungan/Upaya Pantau Lingkungan</i>
WTP	:	Water Treatment Plant

1.0	SCOPE of the CERTIFICATION ASSESSMENT								
1.1	Assessment Standard Used		<ul style="list-style-type: none"> Principles and Criteria for the Production of Sustainable Palm Oil 2018, endorsed by the RSPO Board of Governors and adopted at the 15th Annual General Assembly by RSPO Member on 15 November 2018. RSPO Certification System for Principles and Criteria, 14 June 2017 						
1.2	Organisation Information								
1.2.1	Organisation name listed in the certificate	PT. Agro Sejahtera Manunggal subsidiary of Bumitama Agri Ltd.							
1.2.2	Contact person	Lim Sian Choo							
1.2.3	Organisation address and site address	<ul style="list-style-type: none"> RSPO registered company: Melawai Raya Street No. X, Kebayoran Baru, Jakarta Selatan, 12160 							
1.2.4	Telephone	(62-21) 2783 8200							
1.2.5	Fax	(62-21) 7279 8665							
1.2.6	E-mail	lim.sian.choo@bumitama.com							
1.2.7	Web page address	www.bumitama-agri.com							
1.2.8	Management Representative who completed the application for certification	Lim Sian Choo (Head of CSR and Corporate Sustainability)							
1.2.9	Registered as RSPO member	Bumitama Agri Ltd dated 07 October 2007 Reg.Number : 1-0043-07-000-00							
1.3	Type of Assessment								
1.3.1	Scope of Assessment and Number of Management Unit	Palm Oil Mill and supply base: Pembangunan Raya Mill, Pembangunan Raya Estate, Belaban Raya Estate, Bengkuang Raya Estate and Cooperative Agro Seriam Mandiri							
1.3.2	Type of certificate	Single							
1.4	Locations of Mill and Plantation								
1.4.1	Location of Mill								
	Name of Mill	Location	<table border="1"> <thead> <tr> <th colspan="2">Coordinate</th> </tr> <tr> <th>Latitude</th> <th>Longitude</th> </tr> </thead> <tbody> <tr> <td>S 02° 32' 38"</td> <td>E 110° 23' 57"</td> </tr> </tbody> </table>	Coordinate		Latitude	Longitude	S 02° 32' 38"	E 110° 23' 57"
Coordinate									
Latitude	Longitude								
S 02° 32' 38"	E 110° 23' 57"								
	Pembangunan Raya	Seriam Village, Kendawangan Sub District, Ketapang District, Kalimantan Barat Province, Indonesia							
1.4.2	Location of Certification Scope of Supply Base								
	Name of Supply Base	Location	<table border="1"> <thead> <tr> <th colspan="2">Coordinate</th> </tr> <tr> <th>Latitude</th> <th>Longitude</th> </tr> </thead> <tbody> <tr> <td>S 02° 33' 13"</td> <td>E 110° 18' 43"</td> </tr> </tbody> </table>	Coordinate		Latitude	Longitude	S 02° 33' 13"	E 110° 18' 43"
Coordinate									
Latitude	Longitude								
S 02° 33' 13"	E 110° 18' 43"								
	Pembangunan Raya	Seriam Village, Kendawangan Sub District, Ketapang District, Kalimantan Barat							

		Province, Indonesia				
	Belaban Raya	Seriam Village, Kendawangan Sub District, Ketapang District, Kalimantan Barat Province, Indonesia		S 02 ^o 30' 29"	E 110 ^o 24' 15"	
	Bengkuang Raya	Seriam Village, Kendawangan Sub District, Ketapang District, Kalimantan Barat Province, Indonesia		S 02 ^o 32' 41"	E 110 ^o 24' 12"	
	Cooperative Agro Seriam Mandiri	Seriam Village, Kendawangan Sub District, Ketapang District, Kalimantan Barat Province, Indonesia		S 02 ^o 33' 13"	E 110 ^o 18' 43"	
1.5	Description of Area Statement					
1.5.1	Tenure					
	• State			6,124.69 Ha		
	- Community			960.80 Ha		
* Total scope certification is 6,316.77 Ha. There is area covering 768.72 Ha in Belaban Raya Estate exclude the scope of certification due to RaCP progress. In Time Bound Plan is planned on 2020.						
1.5.2	Area Statement					
		PT ASM	Smallholders	Total		
	• Total area	5,355.97	960.80	6,316.77 Ha		
	• Mature area	4,881.02	914.77	5,795.79 Ha		
	• Mill	8.40	-	8.40 Ha		
	• Emplacement	87.70	-	87.70 Ha		
	• Infrastructure	228.75	35.76	264.51 Ha		
	• Lowland / swamps	24.50	-	24.50 Ha		
	• Unplanted area and Occupation	22.96	10.27	33.23 Ha		
	• HCV	102.64	-	102.64 Ha		
1.6	Planting Year and Cycles					
1.6.1	Age profile of planting year					
	Planting Year	Hectarage (Ha)				
		Pembangunan Raya Estate	Bengkuang Raya Estate	Belaban Raya Estate	Cooperative Agro Seriam Mandiri	Total
	2009	1,063.14	479.48	390.69	911.12	2,844.43
	2010	152.35	1,531.12	1,162.05	-	2,845.52
	2011	-	12.23	70.91	-	83.14
	2012	9.59	-	9.46	3.65	22.70
	TOTAL	1,225.08	2,022.83	1,633.11	914.77	5,795.79
1.6.2	New Planting area after January 2010		Ha			
1.6.3	Planting Cycle		1 st Cycle			
1.7	Description of Mill and Supply Base					
1.7.1	Description of Mill					
	Name of Mill	Capacity	FFB Processed	CPO	Palm Kernel	

		(tonnes/ hour)	(tonnes/year)	Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)
	Pembangunan Raya	60	291,106.76	63,971.36	21.97	11,588.77	3.98
	<i>*Production data source from January to December 2019.</i> <i>*CPO Certified RSPO from April – December 2019 as much as 13,876 tonnes dan PK Cerified RSPO as much as 2,533 tonnes.</i>						
1.7.2	Description of Certification Scope of Supply Base						
	Name of Estate	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ ha/year)	Supplied to Mill	
						FFB (tonnes/year)	%
	Pembangunan Raya	1,318.22	1,225.08	28,696.54	23.42	28,696.54	100
	Bengkuang Raya	2,304.58	2,022.83	15,006.27	7.49	15,006.27	100
	Belaban Raya	1,733.17	1,633.11	7,253.45	4.44	7,253.45	100
	Cooperative Agro Seriam Mandiri (Number of Farmers 660 Farmers)	960.80	914.77	21,409.12	23.40	21,409.12	100
	TOTAL	6,316.77	5,795.79	72,365.38	14.67	72,365.38	100
	<i>*Production data source from January to December 2019</i>						
1.7.3	FFB description from other source						
	Name of sources/Organisation (RSPO certified / non- certified)	Type of Organisation	number of smallholders	Production Area (Ha)	Supplied to Mill		
					FFB (tonnes/year)		
	Seriam Jaya Estate - certified	Subsidiary of Bumitama Agri Ltd	-	1,721.48	12,944.18		
	Membuluh Sejahtera Estate – certified	Subsidiary of Bumitama Agri Ltd	-	3,270.27	887.020		
	Kelompok Tani (PRYE) – <i>Non certified</i>	Smallholders – Full managed	-	-	7,465.92		
	Kelompok Tani (BRYE) - <i>Non certified</i>	Smallholders – Full managed	-	-	29,689.04		
	Kelompok Tani (BLRE) - <i>Non certified</i>	Smallholders – Full managed	-	-	36,476.95		
	Kelompok Tani (Seriam Jaya Estate – <i>Non certified</i>)	Smallholders – Full managed	-	-	47,066.81		
	Kelompok Tani (Membuluh Sejahtera Estate) <i>Non certified</i>	Smallholders – Full managed	-	-	44,312.21		
	Teluk Rengit Estate Non- certified	Subsidiary of Bumitama Agri Ltd	-	-	39,899.25		
	Total					218,741.38	
	<i>*Production data source from January to December 2019</i>						
1.7.4	Product categories			FFB, CPO, PK			
1.8	Tonnage of Product						
1.8.1	Past Annual Claim Certified Product			Previous Certificate Claim		Actual certified product	

		March 25 th , 2019 to March 24 th 2020 (tonnes/year)	April to December 2019 (tonnes/year)					
	• FFB Production	78,096	60,700.16					
	• FFB Production Scheme	14,636						
	• CPO Production	22,256	13,876.46					
	• Palm Kernel (PK) Production	2,782	2,532.77					
	<i>Note:</i> <i>Data differences between sections 1.7.1; 1.7.2 and 1.7.3 with sections 1.8.1 due to different time periods. On sections 1.7.1; 1.7.2 and 1.7.3 period data is January to December 2019 (12 twelve months before audit) and section 1.8.1 period data is April to December 2019 (8 months since Pembangunan Raya POM stated certified on 25 March 2019)</i>							
1.8.2	Product selling							
	Tonnage of selling product	Period of actual selling product April to December 2019						
	• CSPO sold as RSPO certified product	5,250 MT						
	• CSPK sold as RSPO certified product	0						
	• CSPO sold under other scheme	0						
	• CSPK sold under other scheme	0						
	• CSPO sold as conventional	7,732 MT						
	• CSPK sold as conventional	2,304 MT						
1.8.3	Estimate of Certified FFB Claim							
	Name of Estate(s)	Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)			
	Pembangunan Raya	1,318.22	1,225.08	24,000	18,28			
	Bengkuang Raya	2,304.58	2,022.83	14,500	5,73			
	Belaban Raya	1,733.17	1,633.11	5,500	2,57			
	Cooperative Agro Seriam Mandiri	960.80	914.77	17,200	18,69			
	TOTAL	6,316.77	5,795.79	61,200	11,32			
	<i>*Projected FFB production for 25 March 2020 to 24 March 2021</i>							
1.8.4	Estimate of Certified Palm Product Claim							
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel		Supply Chain Module
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)	
	Pembangunan Raya	60	61,200	14,076	23	2,693	4.4	MB
	<i>*Projected CSPO and CSPK production for 25 March 2020 to 24 March 2021</i>							
1.9	Other Certifications							
	ISO 9001:2008		-					
	ISO 14001: 2004		-					
	OHSAS 18001:2007		-					
	ISCC		-					
	Others		-					
1.10	Time Bound Plan							

1.10.1 Time Bound Plan for Other Management Units					
Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status
MILL	Time Bound Plan				
Pundu Nabatindo (PT Windu Nabatindo Lestari)	2014	Pundu Nabatindo	2014	Kotawaringin Timur Regency Kalimantan Tengah	Certified
		Koperasi Harapan Abadi	2020		-
		Kelompok Tani Tenera (Independent Smallholders)	2018	Katingan Regency, Kalimantan Tengah	Certified
		PT Fajar Bumi Nabati (FBI)	2019		-
		PT Gemilang Subur Maju (GSM)	2019	Kotawaringin Timur Regency Kalimantan Tengah	-
Katari Agro (PT Windu Nabatindo Lestari)	2016	Pelantaran Agro Estate	2016	Kotawaringin Timur Regency, Kalimantan Tengah	Certified
		Katari Agro Estate			
		Pantai Mas Estate			
Gunung Makmur (PT Karya Makmur Bahagia)	2014	Gunung Makmur	2014	Kotawaringin Timur Regency, Kalimantan Tengah	Certified
		Sungai Mentaya			
		Bukit Daman			
		KUD Mekar Jaya	2019		ST-2 Audit (June 2019)
		KUD Sekar Tani	2019		ST-2 Audit (June 2019)
		KUD Lestari	2019		ST-2 Audit (June 2019)
		KUD Marga Rahayu	2019		ST-2 Audit (June 2019)
		KUD Usaha Bersama	2019		ST-2 Audit (June 2019)
		KUD Tani Santoso	2019		ST-2 Audit (June 2019)
		PT Tanah Tani Lestari	2020		NPP Audit (2018)
		Koperasi Hapakat (PT TTL)	2020		-
		Koperasi Rika Bersatu (PT TTL)	2020		-
		Koperasi Usaha Bersama (PT TTL)	2020		-
		Koperasi Eka Kaharap (PT TTL)	2020		-
		Koperasi Berkat Usaha Bersama (PT TTL)	2020		-
		Koperasi Bina Tani (PT TTL)	2020		-
		Kelompok Tani Karya Bersama (Independent Smallholders)	2020		-
Bukit Makmur (PT Karya)	2019	Bukit Makmur	2014	Kotawaringin Timur Regency, Kalimantan Tengah	Previous on GMKM certification scope

Makmur Bahagia)		Bukit Kecubung	2014		Previous on GMKM certification scope
		Sungai Puring (PT Langgeng Makmur Sejahtera)	2020		No NPP have got sanction
		Koperasi Telawang Bersatu	2020		-
		Koperasi Hinje Ate	2020		-
		Koperasi Eka Kaharap (PT LMS)	2020		-
Kotawaringin (PT Bumitama Gunajaya Abadi)	2019	Sepantaian	2019	Kotawaringin Barat Regency, Kalimantan Tengah	No NPP have got sanction
		Danau Merah			
		Kotawaringin			
		Tonam Raya			
Lamandau Mill (PT Bumitama Gunajaya Abadi)	2020	(PT Bumitama Gunajaya Abadi)	2020	Lamandau Regency, Kalimantan Tengah	-
		Kumai Hilir Estate (PT Andalan Sukses Makmur)	2020	Kotawaringin Barat Regency, Kalimantan Tengah	NPP Was Complete
		PT Investa Karya Bhakti	2020	Lamandau Regency, Kalimantan Tengah	NPP Was Complete
		Koperasi Kompak Maju Bersama	2020	Lamandau Regency, Kalimantan Tengah	-
		Koperasi Mitra Bahaum	2020	Lamandau Regency, Kalimantan Tengah	-
		Koperasi Tanjung Biru	2020	Lamandau Regency, Kalimantan Tengah	-
		Koperasi Seberang Jaya Sejati	2020	Lamandau Regency, Kalimantan Tengah	-
		Koperasi Pulau Sejahtera	2020	Kotawaringin Barat Regency, Kalimantan Tengah	-
Kendawangan Mill (PT. Gunajaya Karya Gemilang)	2016	Mekar Utama	2016	Ketapang Regency, Kalimantan Barat	Certified 2015
		Kendawangan			
		Banjar Sari			
		Seriam Jaya			
		Membuluh Jaya			
	2019	Koperasi Serba Usaha Bersama	2019	Ketapang Regency, Kalimantan Barat	-
		Koperasi Binasari			
		Koperasi Serba Usaha Karya Bersama			
		Koperasi Binasari			
		Koperasi Perkebunan Fajar Mandiri			
		Koperasi Rimba Sari			
SukaDamai (PT Rohul Sawit Industri)	2019	PT Masuba Citra Mandiri – 1,567.07 Ha	2019	Rokan Hulu Regency, Riau	Certified 2019
		PT Masuba Citra Mandiri – 326.04 Ha the area which suspect into liability mechanism	2020	Rokan Hulu Regency, Riau	-
		Koperasi Karya Melayu	2019	Rokan Hulu Regency, Riau	-

		Sejati			
Pembangunan Raya Mill (PT Agro Sejahtera Mandiri)	2019	Pembangunan Raya	2019	Ketapang Regency, Kalimantan Barat	Certified 2019
		Bengkuang Raya	2019		
		Belaban Raya	2019		
		KopBun Agro Seriam Mandiri	2019		
	2020	Teluk Rengit (PT Gunajay Harapan Lestari)	2020	Ketapang Regency, Kalimantan Barat	-
		Belaban – 768.72 Ha the area which suspect into liability mechanism	2020	Ketapang Regency, Kalimantan Barat	-
		Koperasi Bawal Sejahtera Mandiri	2020	Ketapang Regency, Kalimantan Barat	-
Sungai Rasau Mill (PT Karya Bakti Agro Sejahtera)	2020	Marau Raya	2020	Ketapang Regency, Kalimantan Barat	ST-1 (2014)
		KUD Rangkong Bertuah	2020	Ketapang Regency, Kalimantan Barat	-
		KUD Rasau Tiga Bersama	2020	Ketapang Regency, Kalimantan Barat	-
		PT Agriplus	2021	Ketapang Regency, Kalimantan Barat	-
Selucing Mill (PT. Windu Nabatindo Abadi)	2020	Serawak Damai (PT Windu Nabatindo Sejahtera)	2020	Central Kalimantan	Have not obtained the HGU
Sungai Cempaga Mill (PT. Windu Nabatindo Abadi)	2020	PT. Windu Nabatindo Abadi	2020	Central Kalimantan	No NPP have got sanction
		PT Nabatindo Karya Utama	2020	Central Kalimantan	NPP was complete
		KSU Sehati Pundu	2020	Central Kalimantan	-
		Koperasi Koling Hapakat	2020	Central Kalimantan	-
Bukit Tunggul Jaya Mill (PT Ladang Sawit Mas)	2020	PT Ladang Sawit Mas	2020	Ketapang Regency, West Kalimantan	NPP
		KopBun Bukit Tunggul Sejahtera	2020		-
		KopBun Mitra Perjalanan Permai	2020		-
		PT Lestari Gemilang Intisawit	2020		NPP was complete
		Koperasi Kayong Sekayuk	2020		
		Koperasi Mitra Sejati	2020		-
		PT Ago Manunggal Sawitindo	2020		NPP was complete
		PT Nabati Agro Subur	2020		-
		PT Sejahtera Sawit Lestari	2020		-
		PT Karya Makmur Langgeng	2020		NPP was complete
		PT Gemilang Makmur Subur	2021		NPP on Process
		Koperasi Istana Pawan Mandiri	2021		-

			Koperasi Rungau Sejahtera	2021		-
			PT Dmai Agro Sejahtera	2021		NPP on Process
	Bukit Belaban Mill (PT Sentosa Prima Agro) **Replanting from Acquisition	2021	PT Sentosa Prima Agro	2021	Ketapang Regency, West Kalimantan	-
			PT Raya Sawit Manunggal	2021		-
			PT Wahana Hijau Indah	2021		-
			PT Hungarindo Persada	2022		-
1.10.2	Progress of Associated Smallholders and Outgrowers for Certifiable Standard					
	There are an area of 2000 hectares of smallholders in cooperation with PT ASM, 960.80 ha has been audited in line with this assessment. the rest of the area still preparation for audit and there is area covering 768.72 Ha in Belaban Raya Estate (Kelompok Tani Belaban Raya) exclude the scope of certification due to RaCP progress.					

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-1	<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; RSPO Next, and SA 8000. 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 assessment he was verified environment, HCV, Social and transparencies aspect.</p> <p>2. Brigitta Prita (Auditor). 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 audited experience ISPO & RSPO since April 2013 in the environmental, conservation, waste management and worker welfare aspects. During this assessment she was verified Legal, land dispute, outsourcing, SCCS and GHG aspect.</p> <p>3. Satria Adi Putra (Auditor). Indonesian citizen, Diploma III majoring in Palm Oil Plantation. Have experience of work more than six years since 2009 as the operational staff of private oil palm plantations in Indonesia. Training have been followed including Occupational Health and Safety Expert, Orang Utan and Wildlife Management, ISPO Auditor Training, ISCC Auditor, IHT Potential Mapping and Conflict Resolution in Production Forests, OHSAS 18001, SA 8000, RSPO Lead Training, Lead Auditor Training for ISO 9001, ISO 14001, ISO 17021, ISO 17065, ISO 19011, ISO 22000. During this assessment he was verified best management practices, OHS and worker welfare aspect.</p> <p>4. Johannes Kapri Pandiangan (observer). Indonesian citizen, Bachelor of Agriculture Department of Social Economics of Agriculture, Faculty of Agriculture. Has 7 years experience working as operational staff of one of the leading private oil palm plantation companies in Indonesia.</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA-1	<p>Number of auditors: 3 auditors.</p> <p>Number of days for ASA-1 at site: 5 days.</p> <p>Number of working days for ASA-1 at site: 15 Working days</p>
2.2.2	Assessment Process
ASA-1	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Agro Sejahtera manunggal to the requirements of Principles and Criteria for the Production of Sustainable Palm Oil 2018, endorsed by the RSPO Board of Governors and adopted at the 15th Annual General Assembly by RSPO Member on 15 November 2018 and RSPO Certification System for Principles and Criteria, 14 June 2017.</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>Some opportunities for improvement of the results ASA-1 delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase ASA-2.</p> <p>Improvement of findings from main assesment findings were observed by auditors at this ASA-1 assessment. All</p>

information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of **ASA-1**

The assessment program please find Appendix 2

2.2.3	Locations of Assessment
ASA-1	<p>According to RSPO certification system, all supply bases (4 estates and 1 mill) were visited by auditor team as follows:</p> <p>Belaban Raya Estate</p> <ol style="list-style-type: none"> HCV4.1 (deep peat area), Block F58. Based on field observation sighted that there are signboard which inform about HCV area. Boundary stones number ASM 030, Block I54a. Based on field observation sighted that there are boundary stone with good condition and well demarcated. Boundary stones number ASM 025, Block J61. Based on field observation result sighted that there are boundary stone with good condition and well demarcated. Chemical Storage Warehouse. Observation and interview on environmental aspect, OHS implementation and understanding of working procedure. Housing Complex (Emplacement). Observation on workers facilities, domestic waste management, and Rinse House (BMS and BSS), Child Care, Fuel Tank, Workshop. Fertilizing. Blok I59 Division III. Observation and interview of workers related to fertilization activities starting from technical work, employment, OHS and the impact on the environment. Circle Path and Harvesting Path Spraying. Block F42 Division I. Observation and interview of workers regarding herbicide spraying activities starts from technical work, employment, OHS and the impact on the environment. FFB harvest. Blok G53 Division I. Observation and interview with harvesters related to FFB harvest activities, fruit quality, OHS aspects and employment. TBS transport. Block F63 Division II. Observation and interview with FFB Transport personnel related to loading and unloading activities of FFB, manpower and OHS. Barn Owl Box, Block G66 Division II. Integrated observations of rat pest control by installing and monitoring owl cages. Water Gate. Blok G51 Division I. Observation of gate conditions and water level. Water Level Sticks. Blok F60 Division II. Observe water level stick and water level stick conditions in the collection trenches. <p>Pembangunan Raya POM</p> <ol style="list-style-type: none"> Sterilizer. Observation and interviews with operators regarding work licenses, training and work systems. Engine Room. Observation and interviews with operators regarding work licenses and understanding of emergency response conditions. Press. Observation and interviews with operators regarding day-to-day work responsibilities, PPE, and medical check-up. Boiler. Observation and interviews with operators regarding work licenses and health medical check-up Kernel. Observations and interviews with workers regarding work time, PPE, and knowledge of emergency response conditions. Pos Security, Observation & interview regarding activities, work hours, and FFB acceptance process. Grading Station. Observation and interview regarding grading activities. Fire Fighter Store & Hydrant Simulation. To observe readiness of emergency facility in Pembangunan Raya POM. Material Warehouse. Observation and interview related to environmental aspect, OHS, working procedure, and worker welfare. Hazardous Waste Warehouse. Observation and interview related to environmental aspect, emergency response facilities, OHS, and working procedure.

23. **Water Treatment Process.** Observation related to working procedure, OHS, worker welfare, and chemical management.
24. **Empty Bunch Area.** Observation related to working procedure, OHS, worker welfare and waste management.
25. **Effluent Treatment Plant.** Observation related to working procedure, OHS, worker welfare and waste management.
26. **Land Application, Block 41B.** Observation for effluent treatment plant.
27. **Security post,** observation and interview related worker welfare, OHS, SCC and others.
28. **Weighbridge clerk,** observation and interview related worker welfare, OHS, SCC and others.

Bengkuang Raya Estate

29. **Fertilizer Store.** Observation related to working procedure, and OHS. There are MSDS for all fertilizer, and also fire extinguisher and first aid.
30. **Block Manuring System House.** Observation related to working procedure, OHS, worker welfare and waste management.
31. **Diesel Tank.** Observation related to working procedure, OHS, worker welfare and waste management. The capacity of tank is 10,500 Liter with bund size 5.23 x 3.72 x 0.58 m.
32. **Block Spraying System House.** Observation related to working procedure, OHS, worker welfare and waste management.
33. **Workshop.** Observation related to working procedure, OHS, worker welfare and waste management. There are two welders, however the have no been trained welder certifications.
34. **Lubricant Store.** Observation related to working procedure, OHS, worker welfare and waste management.
35. **Hazardous Waste Store.** Observation related to working procedure, OHS, worker welfare and waste management. There are no logbook and balance sheet, emergencies response preparedness, symbol and label.
36. **Polyclinic.** Observation related to working procedure, OHS, worker welfare and waste management. Interview with paramedic (midwife) sighted that there are several accidents with low categories. For example: there are six accident cases with eight Loss Time Accident (LTA).
37. **Housing Complex (Emplacement).** Observation on workers facilities, domestic waste management, Child Care, Fuel Tank, Workshop.
38. **Fire Fighting Tools Store.** Observation on fire fighting tools, emergencies preparedness response. There are several fire fighting tools, for example: Tohatsu pump, drill, nozzle and others.
39. **BPN No.45 Block E64 Division 4.** Boundary markers has been maintenance well and there are already marked blue borders for certified areas and white ones for non-certified areas.
40. **BPN No.46 Block D63 Division 4.** Boundary markers has been maintenance well and there are already marked blue borders for certified areas and white ones for non-certified areas.
41. **BPN No.47 Block D63 Division 4.** Boundary markers has been maintenance well and there are already marked blue borders for certified areas and white ones for non-certified areas.
42. **BPN No.48 Block C62 Division 4.** Boundary markers has been maintenance well and there are already marked blue borders for certified areas and white ones for non-certified areas.
43. **Bengkuanga Ripaian area block C43/44 Division2;** Observation related management of HCV and riparian area.
44. **Area rehabilitation embankment block C45 Division 2 and C46-C50 Divisi 3.** Observation rehabilitation area.
45. **Landfill block D51 Division 3.** Observation related management of domestic waste.
46. **Fertilizing. Blok C41 Division I.** Observation and interview of workers related to fertilization activities starting from technical work, employment, OHS and the impact on the environment.
47. **Circle Path and Harvesting Path Spraying. Block E56/E57 Division IV.** Observation and interview of workers regarding herbicide spraying activities starts from technical work, employment, OHS and the impact on the environment.
48. **FFB harvest. Blok E45 Division II.** Observation and interview with harvesters related to FFB harvest activities, fruit quality, OHS aspects and employment.
49. **Barn Owl Box, Block D61 Division IV.** Integrated observations of rat pest control by installing and monitoring owl cages.

50. **Piezometer and Pole Subsidence. Blok D64 Division IV.** Observing the condition of the piezometer and pole subsidence, as well as the water level in the planting area
51. **Harvesting, Block E42-45, Division 2.** Observation and interview with Foreman and 2 Harvesters team towards technical, manpower, OHS, environment and conservation aspects.
52. **Piezometer and Subsidence Pole, Block E64, Division 4.** Observe the means of recording peat water level, tools and how to measure peat subsidence.
53. **Manuring, Block C41, Division 1.** Observation and interviews regarding implementation of fertilization procedures, health checks, and handling of fertilizer waste.
54. **Water Intake, Block E65, Division 4.** Observation related water management at peat area.
55. **Interview with spray workers, Block D56/57, Division 4.** Interviews about understanding and implementing procedures, how to work safely, and handling chemicals.
56. **Gupori/Nest Box, Block D61, Division 4.** Observation related integrated pest management.
57. **EFB Application, Block E56/57, Division 4.** Observation related organic fertilizer.

Pembangunan Raya Estate and Cooperative of Agro Seriam Mandiri.

58. **Central Warehouse.** Observation on related to OHS, fire extinguisher and first aid.
59. **Chemical store.** Observation on related to MSDS, OHS aspect and chemical stock.
60. **Fertilizer Store.** Observation related to working procedure, and OHS. There are MSDS for all fertilizer, and also fire extinguisher and first aid.
61. **Block Manuring System House.** Observation related to working procedure, OHS, worker welfare and waste management.
62. **Diesel Tank.** Observation related to working procedure, OHS, worker welfare and waste management. The capacity of tank are 20,792.6 Liter and 20,936.4 Liter with bund size 7.9 x 5.9 x 0.98 m.
63. **Block Spraying System House.** Observation related to working procedure, OHS, worker welfare and waste management.
64. **Workshop.** Observation related to working procedure, OHS, worker welfare and waste management. There are two welders, however the have no been trained welder certifications.
65. **Lubricant Store.** Observation related to working procedure, OHS, worker welfare and waste management.
66. **Polyclinic.** Observation related to working procedure, OHS, worker welfare and waste management. Interview with paramedic (midwife) sighted that there are several accidents with low categories. For example: there are six accident cases with eight Loss Time Accident (LTA).
67. **Housing Complex (Emplacement).** Observation on workers facilities, domestic waste management, Child Care, Fuel Tank, Generator Set Room and Workshop.
68. **BPN ASM No.083 (Smallholders Area) block D08a Division 2.** Boundary markers has been maintenance well and there are already marked blue borders for certified areas and white ones for non-certified areas.
69. **BPN ASM No.083 (Smallholders Area) block D04 Division 2.** Boundary markers has been maintenance well and there are already marked blue borders for certified areas and white ones for non-certified areas.
70. **BPN ASM No.001 (Own Estate) block D11/12 Division 2.** Boundary markers has been maintenance well and there are already marked blue borders for certified areas and white ones for non-certified areas.
71. **BPN ASM No.002 (Own Estate) block D13/14 Division 3.** Boundary markers has been maintenance well and there are already marked blue borders for certified areas and white ones for non-certified areas.
72. **Landfill Block A14 Division 2.** Observation related management of domestic waste.
73. **Conservation forest block B14 dan block B16 Division 3.** Observation related management of HCV.
74. **Fertilizing. Blok B12/B13 Division III.** Observation and interview of workers related to fertilization activities starting from technical work, employment, OHS and the impact on the environment.
75. **TBS transport. Block B14/B15 Division III.** Observation and interview with FFB Transport personnel related to loading and unloading activities of FFB, manpower and OHS.
76. **FFB harvest. Blok C14/C15 Division III.** Observation and interview with harvesters related to FFB harvest activities, fruit quality, OHS aspects and employment.
77. **Barn Owl Box, Block B11 Division II.** Integrated observations of rat pest control by installing and monitoring owl cages.

	<p>78. Sluice. Blok D17/D18 Division III. Observation of sluice conditions and water level.</p> <p>79. Sandy area. Blok A27 / A28 Division IV. Observations related to the application of empty bunches and implantation of <i>Nephrolepis bisserata</i></p> <p>80. Harvesting, Block A12-16, Division 2. Observation and interview with harvesters team towards technical, manpower, OHS, environment and conservation aspects.</p> <p>81. Water Stick & Water Gate, Block D0, Division 2. Observation regarding peat water level</p> <p>82. Interview with spray workers, Block C6/7, Division 1. Interviews about understanding and implementing procedures, how to work safely, and handling chemicals.</p> <p>83. Gupon/Nest Box, Block B8, Division 2. Observation related integrated pest management.</p> <p>84. Water Catchment, Block A16, Division 3. Observation related water catchment.</p> <p>85. Beneficial Plant, Block A13/14, Division 2. Observation related integrated pest management.</p>
2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ASA-1	<p>onsultation of stakeholders for PT Agro Sejahtera Manunggal was held by:</p> <ul style="list-style-type: none"> • Public Announcement at Mutuagung website (www.mutucertification.com) on January 10, 2020. • Consultation with Government Agency on January 28, 2020. • Consultation with local stakeholders (community surround/village) on January 28, 2020. • Consultation with NGO (by email) on January 14, 2020. <p>Numbers of input from stakeholders were clarified by PT Agro Sejahtera Manunggal as apart of RSPO report</p>
2.3.2	Stakeholder contacted
	Please find appendix 1
2.4	Determining Next Assessment
	The next visit (ASA-2) will be conducted eight (8) month to twelve (12) month after date of annual license.

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of Pembangunan Raya POM – PT Agro Sejahtera Manunggal, Group operation consisting of one (1) mill and four (4) oil palm estates.

During the assessment, there were five (5) Nonconformities were assigned against Critical Compliance Indicators eight (8) nonconformities were assigned against Non-critical Compliance Indicators and five (5) opportunities for improvement were identified.

Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5. The company has already prepared and implemented the corrective action(s) that had been reviewed and accepted by Auditor(s) in form of documentation. Those corrective action(s) taken that consist of (5) Nonconformities were assigned against Critical Compliance Indicators had been closed out shall be verified during next assessment.

MUTUAGUNG LESTARI found that **Pembangunan Raya POM – PT Agro Sejahtera Manunggal, Subsidiary of Bumitama Agri Ltd complied with the requirements of Principles and Criteria for the Production of Sustainable Palm Oil 2018, endorsed by the RSPO Board of Governors and adopted at the 15th Annual General Assembly by RSPO Member on 15 November 2018 and RSPO Certification System for Principles and Criteria, 14 June 2017.**

Therefore MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is continued.

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY		
1.1	The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	
1.1.1 & 1.1.2	<p>The Unit Of Certification has a list of information that can be accessed by stakeholders is explained in the Communication and Consultation Procedure (Document No. ASM-SUST-SOP-08-R1, Revised No. R1 signed 02-14-2017). In the procedure it is explained that the department responsible for providing or updating information are Corporate Affairs Department, Corporate Communication Department, CSR Department, Head of Administration, Human Resources Department and Unit Managers. The time to respond to information requests is 15 days.</p> <p>The information such as: HGU documents, SEIA, UKL / UPL, RKL / RPL Reports, Company Policy, HCV, SIA, etc. The Information provide on <i>Bahasa Indonesia</i>, how to submit an application can be oral, email, fax, telephone and a direct visit to the office.</p>	
1.1.3	<p>The company has presented the Register Letter of Entry - D & L-Part-CSR Dept Area 7A document, which contains information on recording in the format of date, letter number of entries, description of information, subject, data, person in charge and information.</p> <p>Procedure No. ASM-SUST-SOP-09 Rev 01 dated 3 December 2019 article 7.2.4 states that:</p> <ul style="list-style-type: none"> - Point A: Information originating from external and internal must be responded by the unit manager or the party appointed by the relevant Public Relations / CSR / D & L no later than 15 days after the information is received. - Point B: Written response must be signed by the Unit Manager before it is submitted to the External / Internal party (who requests the information) and distributed to the relevant stakeholders. - Point D: Communications originating from external sources must be documented in the External Communication Log 	

(Appendix 7.1)

The company has not been able to demonstrate that the implementation of information management is in accordance with the procedures that it has. **It is become non conformity No. 2020.01 with Critical category.**

1.1.4

The company has shown document related socialization of Communication and Consultation Procedure such as on September 16, 2019. The socialization was carried out to stakeholders such as villages, surrounding communities and employees. In addition, the company has also installed a signboard related to the delivery of communication and consultation. Based on the results of interviews with representatives of workers and surrounding villages, it is known that they already know how to deliver messages/communication and the person appointed as the PIC of communication.

1.1.5

The company has shown list of stakeholders document (update on January 2020) that explains such as Name, Position and Mobile Number. The stakeholders include: Kendawangan Sub-District Head, Kendawangan Police Chief, Seriam Village Head, Badak Barendam Hamlet Head, Harapan Manis Hamlet Head, Mangkul Hamlet Head, Seriam Village Secretary, Manpower Agency, Environment Agency, Plantation Agency, National Land Agency, Local Contractors, Plasma Farmers Cooperative.

1.1.3	Status: Non conformity No. 2020.01 with Critical category
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1.2

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

1.2.1 & 1.2.2

Commitment to the integrity code and ethical conduct in all operations area and transaction contained in Code of Conduct document number BGA-COC-HC-333.1-RO dated October 28, 2014. Code of conduct and integrity policy are also listed in BGA group sustainability policy. This policy contained commitment of the company to make an ethical code and integrity in line with good corporate governance in all levels of operation area. In the code of conduct document chapter II "Basic Principles of Good Corporate Governance (GCG), companies respecting fair business practices such as: Transparency, Accountability, Responsibility, Independence, Fairness, and Equality. Code of Conduct BGA Group point 4:12 states on the Granting and Acceptance of gifts, bribes and other.

Transparency commitment listed in BGA code of conduct chapter II "Basic Principles of Good Corporate Governance" point 2.1 with redaction "Company provides material information that relevant, understood and accessible by the stakeholders"

The policy has been communicated shown by:

- Socialization the code of conduct official report dated on December 10, 2019 at Bengkuang Raya Estate attended by 18 participants.
- Socialization the code of conduct official report dated on November 18, 2019 at PRYM attended by 15 participants.
- Socialization the code of conduct official report dated on December 2, 2019 at PRYE attended by 15 participants.

Based on interview with worker union, committee gender and contractor, it is known that they are already know and understand related Code of Conduct Policy.

Status: Comply

PRINCIPLE #2 OPERATE LEGALLY AND RESPECT RIGHTS

2.1

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

2.1.1.

The company shows an audit document listing the legal provisions and regulations with document number 002 / ASM-SUST / XI / 2019 dated 18 November 2019 approved by Region Head 4B. This document informs related aspects that must be done, rules and regulations (articles & paragraphs), fulfilled, evidence of fulfillment and information. Example:

- Regulation of the Minister of Agrarian Affairs and Spatial Planning / Head of the National Land Agency No.7 of 2017 concerning the regulation and procedures for the determination of Land Use Title and Agriculture Minister with number 5 of 2018 concerning land clearing and / or processing of plantation land without burning and others.

Environment

- The CH has Land Application License from Regent of Ketapang with Decree Number 256/DPMPTSP-D.B/2019 dated 8 May 2019 valid for five year. Land application places on 28 blocks (B36-B41; C42-C43; D42-D53; E42-E51; and B42) with area 282.31 Ha.
- The CH has Temporary Hazardous Waste Store form Regent of Ketapang with Decree Number 1491/DPMPTSP-D.B/2017 dated December 2017 with expired period until next five year.

Legal

Based on document verification and interview with legal staff known that the company has had Plantation Business Permit (IUP) in accordance with decree of Ketapang District Head No. 468 year 2009 which stated that PT. ASM allowed to operating 7,250 Ha planted area and 45 ton TBS/hour mills. Based on area statement, the existing area that operated during this audit were 6,591 Ha (based on land use title of nucleus and plasma).

OHS & Employment Aspect

Company proves its compliances toward the applicable regulation, for example the wages is in accordance with Decree letter from Kalimantan Barat Governour about Sectoral Minimum Wage in Ketapang Regency. In the worker welfare aspect, it was known the unit of certification have been paid the employees wage in accordance with the applicable regulation. In OHS Aspect the unit of certification has established the structure for guiding committee for occupational health and safety in each management unit and this committee has received approval from the Ministry of Manpower and Transmigration.

There is no change related the land use title, PT Agro Sejahtera Manunggal managed area covering 7,085.49 Ha consist of 6124.69 Ha own estate and 960.80 Ha full managed smallholder.

2.1.2.

Related to the legal requirements described in the Identification and Audit of Fulfillment of Legal Rules and Requirements No. Document: BGA-SOP-CCS-1102.1.R0, No. Revision: 00, effective date 05-09-2012. There is contractor evaluation form that informs the compliance area companies such as the availability of accessible information for the purposes of operational audit by the certification body; product safety & preservation during product shipment from mill to buyers; roadworthy vehicle condition; drive safe in mill and estate. The company shows an audit document listing the legal provisions and regulations with document number 002 / ASM-SUST / XI / 2019 dated 18 November 2019 approved by Region Head 4B it contains international, national, sub-national and provincial laws.

2.1.3.

The company has a legal boundary monitoring and maintenance procedure guide in the SOP document for the installation and maintenance of boundary poles No. ASM-GIS-SOP on January 3, 2017. The implementation of poles maintenance is documented in the poles monitoring document which is carried out every 4 months.

The company has been mapping the boundaries refer to the coordinates of the point of the concession granted by the National Land Agency. The map document is documented in the Boundary Monitoring Map document with a georeferenced with a scale of 1: 150000 m (datum WGS84, Projection UTM, Zone S49, grid: UTM Grid) made by the GIS Department region of 7-year 2018.

Bengkuang Raya Estate.

Based on field observations at *BPN No.45 Block E64 Division 4; BPN No.46 Block D63 Division 4; BPN No.47 Block D63 Division 4; BPN No.48 Block C62 Division 4*. There are already marked blue borders for certified areas and white ones for non-certified areas.

Pembangunan Raya Estate and Smallholders (Cooperative of Agro Seriam Mandiri).

Based on field visit at *BPN ASM No.083 (Smallholders area) Block D08a Division 2 and BPN ASM No.083 (Smallholders Area) Block D04 Division 2*. There area already legally borders and its maintenance well.

Based on the location permit map document and the Ketapang Regency Spatial Planning map, it is known that the company's operational area is bordered by the Kendawangan watershed and Muara Kendawangan Nature Reserve. In addition, based on field visits in blocks D63 and E64 division IV BRYE, there has been a buffer area between the company's operational area and

the Muara Kendawangan Nature Reserve area. The plasma area of the ASM Plantation Cooperative has obtained the <i>HGU</i> based on <i>HGU</i> Certificate No. 127 Ketapang Regency covering an area of 960.80 Ha dated 13 August 2015 with a validity period of 35 years until 20 May 2050.		
	Status: Comply	
2.2 All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.		
2.2.1 List of all contractor parties been maintained by the unit of certification. Based on document verifications there are 7 contractors who have cooperation with the unit of certifications for activities in transportation (CPO, kernel, FFB, laterite transport and heavy vehicle). Based on document verifications there are no contractors related workers recruitment agencies or operational activity in plantations.		
2.2.2 & 2.2.3 Based on the document's verifications, interview with management and local contractors the unit of certification can be demonstrate if all contracts containing specific clauses on meeting applicable legal requirements and this can be demonstrated. Clauses related legal requirements are mentioned in all works agreements in article 2 who described the fulfillments to Participate in the Insurance, PPE provision and etc.		
As the implementation, the unit of certification can present several efforts to ensure the fulfillment of the legal aspect for contractors among others <ul style="list-style-type: none"> - Monitoring use of PPE - Conduct evaluation and coaching for local contractors, with aspects discussed regarding OHS, minimum wages, BPJS and etc. 		
The results of field observation and interviews with contractor workers can be concluded that workers had been included in the use of PPE, insurance and minimum wages in accordance to the law and no child labor.		
	Status: Comply	
2.3 All FFB supplies from outside the unit of certification are from legal sources.		
2.3.1. Based on document verification sighted that PRYM were received FFB from own estate and out growers as follow: <ol style="list-style-type: none"> 1. Certified RSPO (Belaban Raya Estate, Bengkuang Raya Estate, Pembangunan Raya Estate, Agro Seriam Mandiri Cooperative); PT Gunajaya Ketapang Sentosa (Seriam Jaya Estate & Membuluh Sejahtera Estate). 2. Non Certified RSPO (Belaban Raya Estate, Bengkuang Raya Estate, Pembangunan Raya Estate, Agro Seriam Mandiri Cooperative); Teluk Rengit Estate (PT Gunajaya Harapan Lestari). The CH also showing geo location, business permit and land title information, Teluk Rengit Estate for examples. The coordinate: E 110°6'24.90; S 2°43'36.75"; Plantation Business Permit in accordance to Ketapang Regency Decree Number 365/DISBUN-D/2012 dated 23 August 2012 with area 1,750 hectare. The land use title certificate number 144 dated 27 September 2016 till 27 September 2051 with area 1,973.45 Ha.		
2.3.2. Based on interview with weighbridge operator and document verification sighted that the mill only received FFB from own estate, smallholders, and sister company PT GKS & PT GHL (BGA Group). There are no FFB received from independent supplier/agent.		
	Status: Comply	
PRINCIPLE #3 OPTIMISE PRODUCTIVITY, EFFICIENCY, POSITIVE IMPACTS AND RESILIENCE		
3.1 There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.		
3.1.1		

PT ASM has conducted an analysis of the long-term economic viability for years 2019 - 2024. The document describes projections of areal statement, production of FFB, production and price of CPO and PK, capacity, cost, revenue, and profitability. Evaluation of achievement conducted annually; changes will be made if necessary. One of the control function is to conduct annually financial audit by public accountants.

3.1.2

Based on the results of the document review of the statement area and the results of interviews with the company's management, it is known that there is no plan for replanting for the next 5 years because the oldest planting year is 2009 and the youngest planting year is 2012.

3.1.3

The company has evaluated the long-term plan. The evaluation carried out is an evaluation related to the 2019 plan. From the results of the evaluation it was found that the achievement of the production did not become an evaluation for the operation of hastening the completion of a 57 ha poor figure, a settlement of a bush area of 1503 ha, a dominant insert of 25 ha, a complete handling of 181 ha of water, a completion of 920 ha of sand area and OER that have not been reached because the 85% fruit maturity target has not been achieved.

Status: Comply

3.2

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

3.2.1.

Environment Aspect:

- The CH has conducted regularly monitoring for water quality test, air and ambient quality test every semester.
- The CH has conducted regularly monitoring for pH and effluent debit every month.
- The CH has conducted enrichment species on Riparian Belt of Bengkuang River in Bengkuang Raya Estate, Block C45, Division 2 and Block C46-C50, Division 3.

Social Aspect:

- The CH has conducted regular review for social impact management plan every two year.
- The CH has review CSR program every year with participatory methods.

Best Management Practice:

- The CH has implemented IPM to reducing chemical usage on the estate.

3.2.2.

RSPO matric template not yet available, so this indicator not available.

Status: Comply

3.3

Operating procedures are appropriately documented, consistently implemented and monitored.

3.3.1

Procedure of best management practices is presented is document of Oil Palm Agronomy Standard Operational Procedure (code: BGAAGRKS-SOP-I), issued by Steering Committee Plantation, Organizing Committee Plantation and Director on January 4th 2011.

All procedures were available in Bahasa. Master list of procedure for estate and mill were keeps by Manager. Based on procedures document review, it could be concluded that all SOP's were still relevant with current situation and covers all aspect of best management practices in the estates and mill.

Based on field observation and interview with Foreman and several workers such as Pesticide Applicators, Fertilizer Applicators and Harvesters in all estates, as well as operators in Mill, it could be concluded that the workers were able to explain and demonstrate its job in accordance with the SOP, such as safe working practices and conservation aspects.

3.3.2

Based on interviews with management, it is known that there are procedures to monitor the implementation of SOPs consistently, there are SOPs for Quality Assurance which consist of:

1. ASM-AQA-SOP-001 Standard notification of inspection
2. ASM-AQA-SOP-002 Quality of Harvesting Path
3. ASM-AQA-SOP-003 Fruit Quality (Harvesting Plat Grading)
4. ASM-AQA-SOP-004 Quality Transport
5. ASM-AQA-SOP-008 FFB Grading
6. ASM-AQA-SOP-001 Fertilization and Chemist Application Inspection

To ensure that SOPs are implemented consistently by company operations, a monthly QA assistant is checked.

3.3.3

The company has shown the results of internal monitoring contained in the monthly QA Assistant assessment report to each estate manager. For example, the PRYE fertilization monitoring report with a total fertilizer value of 85.7 (categorized as good) with a breakdown of values of 94 for fertilizing quantity and 81.2 for fertilizing quality. BRYE with a total fertilizer value of 80.7 (categorized as good) with a breakdown of values of 95 for fertilizing quantity and 68.2 for fertilizing quality. BLRE with a total fertilizer value of 76.9 (categorized as satisfactory) with a breakdown of values of 95 for fertilizing quantity and 61.1 for fertilizing quality.

Status: Comply

3.4

A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.

3.4.1.

On 2010, PT. Agro Sejahtera Manunggal establish Environmental Impact Assessment (EIA) document covering estate activities for 7.670 ha and mill capacity 45 mt FFB/hour. This EIA documents explained all activities for pre construction, construction, operation, and post operation covered the palm oil mill, Bengkuang raya estate, belaban raya estate, pembangunan raya estate and KKPA Agro Seriam Mandiri. Company also obtained environmental permit for this EIA, based on West Kalimantan Governor decree No 560/BLHD/2010 on December 13th 2010. Regarding Pembangunan Raya Mill capacity expanding from 45 mt FFB/hour to 60 mt FFB/hour, on 2018 company develop new addendum for EIA. This new EIA document covered an estate areas for 7670 ha, mill capacity 60 mt FFB/hour, and CPO port for 5,41 ha areas. Company also obtained environmental permit for this EIA, based on Ketapang regent decree No 049/DPMPTSP-D.B/2018 on February 9th 2018.

The company has conducted Social Impact Assessment (SIA) in collaborate with Forestry Department of Bogor Agricultural University on 2011, which result has been documented in Social Impact Assessment Report that covered all permit area 8,000 Ha. This assessment determining social impact caused company operational for surrounding villagers and employee of PT. ASM.

SIA report described several issues regarding to the social impact as follow: land ownership, environmental impact, social economy, and culture, employee, labor union and employee facility.

Based on interviews results with representative of the Seriam village community, it is known that the SIA has been prepared in a participatory manner, and all existing social impacts have been identified by the company.

3.4.2.

Based on SEIA document, there are several effects who should monitor and manage by the CH during , such as:

1. Air quality, high noise level, vibration in the mill (boiler, generator, etc).
2. Water and soil conservation.
3. Effluent and solid waste management.
4. Flora and fauna disruption

5. Fidgetiness of communities
6. Fire potential

In addition that the latest SIA review has been conducted on October 2019 participatory with internal and external stakeholders. The Social Impact Management Plan period of 2020 as follows:

1. Land tenurial problem
2. Smallholders performance
3. Development of community economic
4. Development of education quality
5. Community health elucidation & development of community health
6. Improvement of worker welfare
7. Increasing of clean water supply

Therefore, during the audit activities, there are several evidences sighted as follows:

1. Social Impact Management Plan Implementation year of 2019, such as:
 - a. Land tenurial problem solving: there is double claim and differential of land acquisition prices, it was solved by good communication with the local communities.
 - b. Smallholders Performance: not all community get scheme smallholders, lack of smallholder's performance information, cooperative members from outside communities, it was solved by mediation and socialization by Plantation Agency, Cooperative, Head of Village, and cooperative members.
 - c. Development of Community Economic: lack of entrepreneur skills and knowledge of communities, it was solved by make a CSR program in accordance to evaluation of specific project.
 - d. Development of Education quality: lack of education facilities, it was solved by make an education infrastructure on the CSR program.
 - e. Community health elucidation and development of community health: lack of awareness about health knowledge, it was solved by conducting health socialization and medical check up.
 - f. Increasing the preservation of local culture: lack of awareness the youth generation to preserve the local culture, the solution: aiding and participating in the preservation of local culture.
 - g. Improvement of worker welfare: OHS training has not been conducted regularly, the completeness of workers PPE is still lacking, worker union have not been formed, the settlement is by providing PPE's and restructuration of worker union and well cooperates in supporting company operations.
 - h. Increasing of clean water supply: during the dry season, there are several communities have difficulty accessing of clean water, the solution is providing wells and toilet in 2015.
 - i. Electrical connecting for the community in 2011.
 - j. Good communication with related smallholders.
 - k. Based on complaint log book in PRYE period of October to December 2019 sighted that there are several complaints from the workers. For example: related to the damage of septic tank, leaky roof, and clean water has not been distributed to the housing. This information also obtained by interviews with the several employees in PRYE.

However, not all issues or impact of company operations have been identified on the social and environmental management and monitoring plans. **It is become as non conformity number 2020.02 with Non Critical category**

3.4.3.

The CH has to reduce negative impacts among others land completion by involving local communities, development of scheme smallholders, local business development, educational infrastructure assistance, health facility for local community, provide electricity for community, provide clean water assistance, recruitment of local workers, etc.

Based on environment monitoring and management realization on Semester I year of 2019 discussing the impact of plantation and mill operations on several aspects, such as: air quality; vibration & noise; soil water conservation; liquid & solid waste management; fire potential; disruption of flora & fauna; and public unrest. However, the evaluations made by the management unit have not been explained trend evaluation, critical level evaluation, and compliance evaluation in accordance to Environment Minister Decree Letter number 45 year of 2005. And also there has not been shown evidence that evaluation been carried out in a participatory manner involving all stakeholders (internal & external). **It is become as non conformity No**

2020.03 with Critical category

3.4.2.	Status:	
3.4.3.	Non conformity No 2020.02 with Non Critical Category	
	Non conformity No 2020.03 with Critical category	

3.5
A system for managing human resources is in place.
3.5.1

The Company has policies related to equal opportunities and treatment to obtain employment opportunities in the Internal Office Memo Document (No: 383/Reg 4B/X/2019) concerning Child Protection Policy and Women Workers, Same Policies and Opportunities in Employment Opportunities (Human Rights) and the Association and Gathering Policy which is valid on 1 September 2019. The policy explains among others:

- BGA Group management prohibits the employment of children under age (less than 18 years) working or employed which can endanger the safety, health and morals of children. This also applies to contractor workers.
- BGA Group management is committed to protecting the reproductive rights of women workers by strictly prohibiting female workers, both PTH, PTT and contract workers who, during pregnancy and / or breastfeeding, work and or are employed using chemicals (pesticides / fertilizers) if there are pregnant workers in place the work can be done in the form of transfer or transfer to other work that is not related to chemistry.
- BGA Group management protects every workers from all forms of violence and sexual harassment.
- BGA Group management provides equal opportunities and treatment by not differentiating race, ethnicity, religion, nationality, disability, gender, sexual orientation, union membership, and political affiliation.
- BGA group management has given freedom the employee to make a worker union and or to be a member of worker union.

PT ASM already communicated the procedure related human right for all worker such as at Bengkuang Raya Estate (on December 18, 2019), Belaban Raya Estate (on January 6, 2020) and Pembangunan Raya Estate (on November 16, 2019). The procedure (human right) was include equal opportunities and treatment by not differentiating race, ethnicity, religion, nationality, disability, gender, sexual orientation, union membership, and political affiliation.

Beside that, the procedure related recruitment, selection, employee hiring, promotion, retirement and termination was documented and available on site.

Based on interview with harvester and spraying operator, it is know that the worker already know the procedure related retirement and promoting. Beside that, it is known that the labor sector is stored and managed by the HR (Human Resources).

3.5.2

The company has shown that labor procedures are properly implemented, recorded and managed. The implemented related of labor procedure such as:

Promotion, Employee Assessment and Appointment of Employees

- Work Agreement No.03/ASM-BRYE/SK/II/2019 dated on February 8, 2019 states Daily Worker with initial H from those who were previously contract employees have been appointed as permanent employees as of February 8, 2019.
- Work Agreement No.045/SK-UPAH/ASM-PRYE/III/2018 dated on March 8, 2018 states Daily Worker with initial N from those who were previously contract employees have been appointed as permanent employees as of March 8, 2018.

	Status: Comply	
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3.6
An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.
3.6.1; 3.6.2

Policy related to OHS namely Occupational Health and Safety signed by BGA Director on June 2013 and written in Indonesian Language. The policy explains that all worker have to obey, maintain, and implement the OHS in workplace. OHS committee is formed for monitoring the OHS implementation in workplace. Based on interview with workers known that they have been known about the OHS policy, for example workers are required use PPE while working and safe working practices. The policy

was place in Estate and Mill Office.

The company also shown the HIRAC document for Mill and Estate. The HIRAC document was conducted for all the operational such as harvesting, spraying, manuring, planting, slashing, landscaping, pest and disease, traction, generator operation, grading, loading ramp, engine room area, sterilizer area, boiler area and etc. HIRAC always evaluate every year or will be change if there are an serious accident. HIRAC was monitored and controlled by OHS Expert.

The company had a mitigation plan for the identification issues in risk assessment. The mitigation plan was shown on Recommendation of P2K3 and already reported to Manpower Agency of Ketapang Regency. Example of identification issue such as:

- Potential Risk : Motorcycle Crash (driver without helmet); available crash : Fall from the motorcycle and head injury; Recommendation : Socialization for all the workers related safety riding and take a signboard.
- Potential Risk : Wet Floor ; available crash : Fall because of slippery ; Recommendation : making a signboard to indicate the wet floor.

The company shown the Annual Programmed of P2K3 (Department Sustainability PT ASM) period 2019 and 2020. The document was showed planning of the program such as Routine Meeting of P2K3 members, OHS inspection, HIRAC evaluation, MSDS evaluation, SMK3 audit, training and sosialization of OHS, routine medical check up for workers, inventarization of Emergency Response Preparedness, accident investigation, and P2K3 reporting to the agency.

Beside that, the planning also implemented such as:

- Routine meeting of P2K3 member on December 10, 2019. The meeting was discuss related PPE, accident monitoring and analyzed.
- P2K3 training at Bengkuang Raya Estate (December 9, 2019). The training was attended with 24 members (photo and report)

The company has conducted regular health checks for mill and estate workers. In the Health Test Identification Document states that regular health checks for employees include MCU (once a year), Audiometry (once a year), Cholinesterase (twice a year), Spirometry (once a year) and pregnant test (once a year).

Company already had recorded of work accidents in work accident analysis report and OHS performance rating for 2019 period. The summary of records tells about accident report calculated by Lost Time Accident (LTA) metric which results of ratio is Frequency Rate (FR), Severity Rate (SR). The LTA from January to December 2019 is 65 days loss. Based on interview and document review, there's no major accident in the 2019 period, so the company still not claim the insurance.

The company has a document to identification PPE according to the job, for example the spraying activity needs helmet, face shield, gloves, apron and shoes for PPE. The company also give PPE to worker such as :

- PPE for harvester (31 members) in Division 3 BRYE on December 23, 2019. The worker give a booth shoes, uniform, helmet and *egrek/dodos* cover.
- PPE for sprayer (24 members) in Division 3 BRYE on December 16, 2019. The worker give a apron, helmet, uniform, boot shoes, gloves and mask.
- PPE for manuring operator (31 members) in Division 3 BRYE on December 30, 2019. The worker give a mask, boot shoes, apron and gloves.

Based on field visit at Block C41, Division 1 Bengkuang Raya Estate, it is know that the worker already give the PPE according to the HIRAC such as helmet, apron, gloves, face shield, shoes and mask. The worker also explain that the PPE was associate with their work.

Status: Comply

3.7

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

3.7.1

The company has a training program for all worker and staff. The implementation program for 2020 such as :

- Environment Policy

- Emergency Procedure
- First Aid Kit Training
- Risk Assessment
- Environment Aspect Identification
- Chemical Handling
- Material Safety Data Sheet
- Hazardous Waste Handling
- Fire Drill Simulation
- BGA Sustainability Policy
- Human Right Policy
- HCV Handling
- Spraying and Manuring Procedure
- Harvesting Procedure
- Pest Management
- Water Management Program
- Principle and Criteria RSPO/ISPO

The company has showed the recap of training 2019, based on that document it is know that the company has conducted training for stakeholder (including smallholder and cooperative). The example training for smallholder such as fire control, OHS and environmental protect. Based on interview with smallholder (Agro Seriam Mandiri), it is know that the smallholder already get a training such as PPE used and fire control.

Based on interviews with factory and plantation employees such as sterilizer operators, boilers, kernels, engine rooms, harvesters and spraying teams, it is known that socialization and training have been routinely carried out at least during morning briefings. Health and Safety Materials such as compliance with PPE, health checks, and emergency response are also routinely delivered to employees.

3.7.2

The company has shown the Recapitulation of List of Operating Permit Documents for plantation and factory employees detailing the type of training that is owned / given to company employees. However, the company has not been able to show that all training records for contract workers have been recorded and managed. **It is become as non conformity 2020.04 with Non Critical category.**

3.7.3

The latest training conducted on 26 January 2020 attended by PIC of each SCCS aspects, as well as socialization for contractors. During the audit, the Staff and operators shows the understanding of SCCS requirement and critical point, for example security and weighbridge operator were able to demonstrate how to verify the FFB from certified and uncertified source and marking by certified stamp.

3.7.2	Status: Non conformity No. 2020.04 with Non Critical category	
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3.8

Supply Chain Requirements for Mills

3.8.1 & 3.8.2.

The organization receives FFB from certified and non-certified units, so that the module Mass Balance apply.

3.8.3.

The Organization has estimated the amount of tonnage from FFB, CSPO & CSPK produced during the April to December 2019 with details:

Item	License volume (Tonnes) March 25 th , 2019 – March 24 th 2020.	Actual production (April to Dec 2019)

FFB	92,732	60,700.16
CPO	22,256	13,876.46
PK	2,782	2,532.77
Note: Based certificate license, the organization have certificate on March 25th, 2019 so for January until 24th March 2019 its non-certified FFB.		

3.8.4.

The organization has been registered in Palm Trace with number RSPO_PO1000004866 and RSPO Member number 1-0043-07-000-00. License ID CB 830389.

3.8.5.

The company shows the identification procedure and product traceability with document number ASM-SUST-SOP-43 which was approved by Regional Head 4b on January 14, 2020. This procedure applies from the receipt of raw materials (FFB), production processes, finished material warehouse / bulking station and the process of sending products to buyers in operational unit. The shelf life of all records or reports from the receipt of FFB in the mill, the processing of palm oil, storage of CPO products, Kernel to the buyer is 5 years.

The Certification & Compliance Department will provide training to all staff and employees involved in implementing the supply chain certification system requirements. The commercial department in the process of selling its products to buyers uses the Incoterms system which is a series of terminology used in trade transactions between countries issued by the ICC and also recognized by the government, legal authorities and traders.

The sustainability region will immediately provide written information to the RSPO certification body, if there is excessive RSPO certified production than projected. Corporate sustainability will ensure the validity of the RSPO certificate from the relevant management unit through checking on the RSPO website or the RSPO IT system and will also be carried out by the certification body during the RSPO Surveillance audit in the related management unit at least once a year. The commercial department will review and ensure that the requirements required in the Supply Chain certification standard are specified in the CLA between the management and the relevant contractor.

3.8.6.

The company shows SOP regarding internal audit with document number ASM-SUST-SOP-50 approved by Regional Head 4b on January 14, 2020. Based on procedure, the internal audit SCCS will be conducting every 1 year. The internal audit results will be discussed in a management review meeting according to the management review meeting procedure and records will be kept maintained by the program internal audit coordinator. Internal audit supply chain was conducted on January 2020 and the improvements listed in the management review on January 16, 2020. This document it contain

Issues, corrective and actions, PIC, due date, status and completion date. Based on document and interview with management representative there is claim and complaint related CSPO & CSPK product of Pembangunan Raya Mill.

3.8.7.

Organization has been verified the FFB received from certified and non-certified sources, shown in the table below since April – Dec 2019:

- Pembangunan Raya FFB Certified amount of 21,360.10 tones/year.
- Bengkuang Raya FFB certified amount of 11,049.89 tones/year.
- Belaban Raya FFB certified ampunt of 5,463.86 tones/year.
- Cooperative Agro Seriam Mandiri FFB amount of 16,218.08 tones / year.
- **Total FFB certified on April – December 2019 amount of 54,091.93 tones / year.**

* There are 2 estates that supply FFB certified (Seriam Jaya Estate and Membuluh Jaya Estate its include Kendawangan mill that have received RSPO Certificate on 2015) with total certified RSPO is **6,608.23 tones/year**. Total production is **60,700.16**

tones/year.

Note: FFB Certified for the period April 1st - December 31st 2019 (Because the organization obtained RSPO certificates in 25 March 2019).

Production data for certified and non certified CPO & PK for the period April - December 2019 with details:

Months 2019	CPO Production (kg)			PK Production (kg)		
	Cert	Non-Cert	Total	Cert	Non-Cert	Total
April	2,286.65	4,535.93	6,822.58	388.65	770.95	1159.6
May	2,128.45	4,137.75	6,356.20	373.1	725.32	1098.42
June	1,071	2,698.94	3,769.94	194.23	489.45	683.68
July	1,301.19	4,099.15	5,400.34	236.59	745.34	981.93
August	1,310.97	4,713.19	6,024.16	246.74	887.09	1133.83
Sept	1,534.08	4,848.79	6,382.87	303.98	960.79	1264.77
Oct	1,295.50	4,685.40	5,980.90	257.99	933.06	1191.05
Nov	1,472.71	4,018.78	5,491.49	282.22	770.13	1052.35
Dec	1,475.91	4,434.63	5,910.54	249.27	748.98	998.25
Total	13,876.46	38,172.56	52,139.02	2,532.77	7,031.11	9,563.88

Based on production report period April 1st - December 31st 2019 for FFB, CPO & PK shown in the table below:

Item	Production estimated (Tons) March 25 th , 2019 to March 24 th 2020.	Actual production (April to Dec 2019)
FFB	92,732	60,700.16
CPO	22,256	13,876.46
PK	2,782	2,532.77

Based on tabel above, there is no excess of projection of production.

Based on field observations at *BPN No. 45 Block E64 Division 4; BPN No. 46 Blok D63 Division 4; BPN No. 47 Blok D63 Division 4; BPN No. 48 Blok C62 Division 4* at Bengkuang Raya Estate. There are already marked blue borders for certified areas and white ones for non-certified areas its according with the mechanism regarding certified and non-certified products has been stated in the identification procedure and product traceability with document number ASM-SUST-SOP-43 which was approved by Regional Head 4b on January 14, 2020.

3.8.8.

Information for RSPO certified products is available in the sales order document, the information including: name and address of the buyer, name and address of the seller, delivery date, date of documents issued, volume of product, applicable supply chain model, and transport information. For example: sales number 1100009321, date on Mei 21 2019; Quantities as much as 1000,000 kg, delivery date on July 8, 2019 – May 24, 2019; CPO sales as RSPO Certified Mass Balance, and others.

3.8.9.

Based on interviews with the scales clerk and document review are known, the organization rents CPO & PK transportation vehicles on behalf of PT Suri Adidaya Kapuas and CV Kawira Putra for example:

- Contract agreement of CPO between organization and CV Kawira Putra with number 1100010200-DEVSIS 0002 / DEVSIS / ASML / 2020 with a quantity of 1000.000 kg and 1100010201-DEVSIS 0003 / SIPB / ASML / 2020 with quantity of 800,000 kg is located at the jetty of *Tiyang Balai*. In addition: The security, safety and integrity of the goods to be sent are entirely the responsibility of CV Kawira Putra is willing to be examined by the RSPO certification body. This letter has been signed by both parties.

- Contact agreement of PK between organization and PT Suri Adidaya Kapuas date on January 8, 2020 with contract number 1100010067 & 1100010238 is located at the jetty Meta Dungun with quantity of 11,720 kg and 688,000 kg. In addition: The security, safety and integrity of the goods to be sent are entirely the responsibility of PT Suri Adidaya Kapuas is willing to be examined by the RSPO certification body. This letter has been signed by both parties.

3.8.10.

The organization carries out CPO & PK transportation vehicles on behalf of PT Suri Adidaya Kapuas and CV Kawira Putra for example:

Contractors name	Service	Location	Contact
PT Suri Adidaya Kapuas	Kernel transportir	Rahadi Osman road, number 3 RT 1, RW 1, Kendawangan Kiri, Kendawangan, Ketapang District, West Borneo.	082158794xxx (SYH)
CV Kawira Putra	CPO transportir	R Suprpto Road, RT 14/RW 007, Sampit Sub Village, Delta Pawan Sub District, Ketapang District.	081345933xxx (SLH)

3.8.11.

It will be verified in the next surveillance, based on document and interview with management representative there is no new contractors.

3.8.12.

Pembangunan Raya POM has maintained all records of SCC in accurate, complete, and up-to-date, all the records are available in mill office and accessible, such as FFB suppliers, production record and sales records.

Months	CPO Production (kg)			PK Production (kg)			CPO Sales		PK Sales	
	Cert	Non-Cert	Total	Cert	Non-Cert	Total	RSPO	Conv	RSPO	Conv
April to Dec	13,876.46	38,172.56	52,139.02	2,532.77	7,031.11	9,563.88	5,250	7,732	0	2,304

Mill manager have responsibilities to:

- Keep and maintain all documents and records of the use of all raw materials, supporting materials used in the production process and the quality of the final product.
- Verify the status of the product sent to the buyer by ensuring delivery of the product according to invoice, DO, sales contract and signing the minutes of product delivery together with the buyer.
- Provides adequate training on SC certification requirements to all staff.
- Identify the status of receiving raw materials (FFB) and processing products that are RSPO and non RSPO certified.

3.8.13 and 3.8.14.

Audit are done to CPO Mill, the conversion rate of CPO (OER) and PK (KER) are based on daily production.

3.8.15.

Organization applying RSPO SCCS Module E (Mass balance).

3.8.16.

The company has conducted transactions for CSPO from April to December 2019 with details:

Transaction ID	Transaction Date	Product	Volume
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TR-622358b6-569e	25-11-2019	CSPO	240
TR-648d7ec0-8225	25-11-2019	CSPO	1260
TR-43d67463-7d76	5/11/2019	CSPO	1000
TR-411bfd3e-1e2e	19-08-2019	CSPO	1000
TR-d5f70e88-4334	18-06-2019	CSPO	1750
			5,250

Observed evidence:

Based on mass balance data on April – December 2019, it is known that:

CPO.

Apr-Dec 2019	
CSPO Sold as RSPO Claim	5,250
CSPO Sold as Conventional	45905
CSPO Production	13,876
Non CSPO Production	38173
Total CPO Production	52,049
Stock RSPO	8,626
Remove	7,732

PK

Apr-Dec 2019	
CSPK Sold as RSPO Claim	0
CSPK Sold as Conventional	9335
CSPK Production	2,533
Non CSPK Production	7,031
Total PK Production	9,564
Stock RSPO	229
Remove	2,304

Based on Palm Trace of Pembangunan Raya mil date on January 30, 2020 it is known:

Stock Overview								
Member Information					License Information			
Member Name	Pembangunan Raya Mill, PT Agro Sejahtera Manunggal				License ID	CB83089		
Member ID	RSPO_PO1000004866				Issued By	PT Mutuagung Lestari		
Member Country	INDONESIA				Issued On	28-03-2019		
Member Category	Oil Mill				Start Date	25-03-2019		
Core Product	Palm Oil				End Date	24-03-2020		
					License Status	Active		
Product	Supply Chain Model	Certified Volume*	Announced Volume*	Volume Allocated as Credits*	Volume Sold as Physical*	Volume Sold as Credits*	Volume Removed*	Remaining Certified Volume*
CSPK	Mass Balance	2,782	0	0	0	0	2,267	515
CSPO	Mass Balance	22,256	0	0	5,250	0	0	17,006
FFB_estates	Mass Balance	78,096	0	0	0	0	0	78,096
FFB_scheme_or_ass...	Mass Balance	14,636	0	0	0	0	0	14,636

* Volumes in MT
 Certified Volume* = Original Certified Volume + Carry Over Volume + Extended Volume

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Non-Conformance Description:

Based on the data above, RSPO certified volumes have been sold conventionally and no evidence of removing for CSPO of 7,732 MT and CSPK of 2,304 MT. Based on that, it become **non-conformance No.2020.05 with critical category**.

3.8.17.

Pembangunan Raya mill does not use trademark and RSPO logo on its operation, sales document and business communication.

**Critical
3.8.16**

Status: Non-conformance No.2020.05 with critical category.

PRINCIPLE #4 RESPECT COMMUNITY AND HUMAN RIGHTS AND DELIVER BENEFITS
4.1

The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.

4.1.1; 4.1.2

The Company has policies related to equal opportunities and treatment to obtain employment opportunities in the Office Memo Internal Document (No.:001/ASM-SUSTV/2018) concerning Child Protection Policy and Women Workers, Same Policies and Opportunities in Employment Opportunities (Human Rights) and the Association and Gathering Policy which is valid on 31 May 2018. The policy explains among others:

- BGA Group management prohibits the employment of children under age (less than 18 years) working or employed which can endanger the safety, health and morals of children. This also applies to contractor workers.
- BGA Group management is committed to protecting the reproductive rights of women workers by strictly prohibiting female workers, both PTH, PTT and contract workers who, during pregnancy and / or breastfeeding, work and or are employed using chemicals (pesticides / fertilizers) if there are pregnant workers in place the work can be done in the form of transfer or transfer to other work that is not related to chemistry.
- BGA Group management protects every workers from all forms of violence and sexual harassment.
- BGA Group management provides equal opportunities and treatment by not differentiating race, ethnicity, religion, nationality, disability, gender, sexual orientation, union membership, and political affiliation

The company also had a Labor and Human Right Policy that approved by Regional Head on November 11, 2019. The policy said that PT ASM respecting human rights as stipulated in the Law of the Republic of Indonesia Number 32 of 1999. The company is also committed to protecting whistle blowers related to human rights and is also committed not to carry out acts of intimidation outside the law.

The policy also communicated and socialized to workers and stakeholders on December 20, 2019. The photo and attendance list was attached.

Based on interview with local contractor, bipartite institution and committee gender, it is known that they already understand about the policy. Interview with worker in estate and mill informed that there is no complaint related to violation of human rights.

Status: Comply

4.2

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

4.2.1; 4.2.2; 4.2.4

The company has the procedures of Grievances Resolution with no. SOP-BGA-SOP-HC-311-1-R0, that approved on April 25th 2012. This procedure explain about the process of delivering and handling of complaints and grievances from both internal and external. In the procedures also mentioned that the company guarantees the anonymity of the reporting and the revealer of the case (*whistleblower*).

Protection policy for whistle blower also stated in sustainability policy that published on August 13th 2015. Through this policy stated that *"We strive to amicably resolve conflicts and complaints with all parties in an open, transparent and constructive manner through our complaints and whistleblowing procedures, in addition to the RSPO complaints mechanism. Significant non-compliance of this policy will be monitored and reported to the company's Board. The corrective measures taken, where appropriate, will be publicly reported"*.

Based on interview with worker and document review, it is know that there are not complain to be brought to the RSPO Complain System. The majority of complaints came from repairing damage to infrastructure.

Beside that, based on the results of interviews with representatives of trade unions, gender committees, and representatives of surrounding village communities, it is known that at the time, there were no complaints or disputes. As stated by company representatives, specific mechanisms agreed by the parties will be developed if there are significant disputes or complaints.

4.2.3

As for complaints during 2019 and 2020, the majority of complaints came from repairing damage to infrastructure such as on January 20, 2020 there were complaints of leaky ceiling roof. This was responded on April 15, 2020 with the realization of procurement of new ceiling roofs. Beside that, the company has shown a complaint book that is in every estate and mill in which there are several formats are not uniform, including:

- Belaban Raya Estate with Recording Format (Date, Name, Complaint, Follow Up, Person in Charge)
- Bengkuang Raya Estate (Div III) with Recording Format (Name, Division, Issue, Response, Deadline)
- Pembangunan Raya Estate with Recording Format (Date, Employee Name, Division, Issue, Solution, Timeframe)
- Pembangunan Raya Mill with Recording Format (Number, Name of Worker, Position, Worker Complaints, Management Responses, Initials)

The company has a Procedure No. ASM-SUST-SOP-09 Rev 01 dated 3 December 2019 article 7.2.4 states that:

- Point A: Information originating from external and internal must be responded to by the unit manager or the party appointed by the relevant Public Relations / CSR / D & L no later than 15 days after the information is received.
- Point B: Written response must be signed by the Unit Manager before it is submitted to the External / Internal party (who requests information) and distributed to the relevant parties concerned.
- Point D: Communications originating from external sources must be documented in the External Communication Log (Appendix 7.1)

The company has not been able to demonstrate that the implementation of complaints management is not in accordance with the procedures that it has. **It is become non conformity No. 2020.06 with non critical category.**

4.2.3 Status: Non conformity No. 2020.06 with non critical category.

4.3

The unit of certification contributes to local sustainable development as agreed by local communities.

4.3.1.

Based on interview with Head of Harapan Manis Hamlet sighted that The CH was attended on the forum group discussion with them on December 2019. It was obtained information that the CH has identified the local communities needed. They also explained about CSR program realization is already gain such as: infrastructure aspect, religious aspect, and community development. The CH was shown CSR report on the year of 2019 such as: *Gawai Adat* (Ethnical ceremonies) in Badak Berendam Hamlet and Tiang Balai Hamlet on January, April and June 2019, Religious ceremony such as Paskah and “*Safari Ramadhan*” in Badak Berendam Hamlet, Mengkul Village, and Kendawangan Village, School revitalization in Badak Berendam Hamlet, medicinal treatment in Badak Berendam Village, Health integrated post in Seriam Village, Clean water supplying in Seriam Hamlet on October 2019, etc. The CH also has agreement with several local contractor, for example: CV Agro Seriam Mandiri as FFB transporter. Based on interview with CV Agro Seriam Mandiri owner sighted that the payment of contract is according to agreement.

The CH also have others contribution to increagreement with seven local contractors, for example: agreement letter number 096-PRWTN/ASML-PRYE/LKL/11/2019 with CV Agro Seriam Mandiri dated 16 November 2019 till 15 December 2019 for laterite transport on PRYE. Based on interview with board of CV Agro Seriam Mandiri sighted that payment system in accordance to the agreement.

Status: Comply

4.4

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

4.4.1; 4.4.2; 4.4.3.

The company showed procedure regarding the handling of land disputes with the number BGA-SO-ASM 25 - RO endorsed by the Regional Head January 2, 2020. This procedure describes the process of settlement of land conflicts which aims to create a standard in the process of compensation for crops and land throughout the BGA Group operational area and minimize errors in the implementation of compensation and land to save the company assets.

PT Agro Sejahtera Manunggal managed area covering 7,085.49 Ha consist of 6124,69 Ha own estate and 960.80 Ha full managed smallholder. Towards that's area PT. Agro Sejahtera Manunggal has had land use title/HGU for his own operating area according to HGU certificate No. 65 (dated on July 17th 2013) located in Seriam Village which covered area **5,630.20 Ha** and decree from The Ministry of Agrarian Affairs and Spatial Planning/National Land Agency No 52/HGU/KEM -ATR/2018 dated 04 June 2018 which covered **494.49 Ha**. The land use title for scheme smallholder are No. 127 (dated on August 13th 2015) located in Seriam Village which covered area **960.80 Ha**. According to the agreement between the companies with Plantation Co-Operation Agro Seriam Mandiri agreed that smallholders (Plasma) area were fully managed by PT. Agro Sejahtera Manunggal.

Based on interview with representatives of Village Seriam, Sub-village Harapan Manis, community leaders, cooperative ASM, and previous land owners (Seriam Village) obtained information if that the entire operational area of the company had been compensated. The compensation process involved all community witnessed also by the Village Head, Dayak Customary leader of Seriam Village, Subdistrict head of Kendawangan, Kendawangan Sector Police and Ketapang Regency's staff of plantation agency. The compensation process is based on the basis of consultation and negotiations are transparent and meet the demands for social justice. The results of the verification document can be shown on the document of the acquisition of land rights shown by the company in the document *REKAPITULASI PERMOHONAN DANA GRIT - WILAYAH VII* for the period 2008 - 2015 with a total area of 6,725.66 hectares, to 480 households. There is document Land compensation map with a scale of 1: 2,341 m (datum WGS84, Projection UTM, Zone S49, grid: UTM Grid) made by the GIS department for region 7 in 2016.

4.4.4 & 4.4.5.

Based on interview with previous land owners, measurements carried out with a participatory map witnessed by the land owner, GIS and company representatives and received by the land owner. All documents related to the informations provided in the Indonesian language that can be understood by the parties, including maps, agreements, notes, and others. The results of interviews with previous landowners (Seriam Village) it is known that the indemnity document uses Indonesian that has been understood by the land owner. There are no obstacles related to land compensation documents.

The compensation process involved all community witnessed also by the Village Head, Dayak Customary leader of Seriam Village, Subdistrict head of Kendawangan, Kendawangan Sector Police and Ketapang Regency's staff of plantation agency. The compensation process is based on the basis of consultation and negotiations are transparent and meet the demands for social justice.

4.4.6.

Based on interview with representatives of Harapan Manis Sub-village and previous landowners (Seriam Village) 5 people, its known every each compensation for land has been replaced by the company and FPIC has been carried out in accordance with applicable procedures, a copy and agreement have been mutually agreed.

Status: Comply

4.5

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

4.5.1; 4.5.2; 4.5.3; 4.5.4; 4.5.5; 4.5.6 & 4.5.7.

There is no new planting or new acquisition under Pembangunan Raya Estate, Belaban Raya Estate, Bengkuang Raya Estate, Cooperative Agro Seriam Mandiri. PT Agro Sejahtera Manunggal managed area covering 7,085.49 Ha consist of 6124,69 Ha own estate and 960.80 Ha full managed smallholder. Towards that's area PT. Agro Sejahtera Manunggal has had land use title/HGU for his own operating area according to HGU certificate No. 65 (dated on July 17th 2013) located in Seriam Village which covered area **5,630.20 Ha** and decree from The Ministry of Agrarian Affairs and Spatial Planning/National Land Agency No 52/HGU/KEM -ATR/2018 dated 04 June 2018 which covered **494.49 Ha**. The land use title for scheme smallholder are No. 127 (dated on August 13th 2015) located in Seriam Village which covered area **960.80 Ha**. According to the agreement between the companies with Plantation Co-Operation Agro Seriam Mandiri agreed that smallholders (Plasma) area were fully managed by PT. Agro Sejahtera Manunggal.

Status: Comply

4.6

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

4.6.1; 4.6.2; 4.6.3; 4.6.4 & 4.6.5.

There are no communities nor individual has any implications for the legal status of their land or have been disputed since PT Agro Sejahtera Manunggal has legal land titles.

The company showed procedure regarding the handling of land disputes with the number BGA-SO-ASM 25 - RO endorsed by the Regional Head January 2, 2020.

1. For any land conflict that arises, the Regional Public Affairs Department (PAD) seeks accurate information related to the land conflict and the Regional PAD immediately conducts internal coordination with both the HO management and the related controller area to seek management approval for the negotiation process steps to handling any land conflicts that arise.
2. Regional PAD together with related management units negotiates with land rights holders and other related parties to jointly determine the process of handling the conflict by deliberation and consensus.
3. If the process of handling the land conflict is agreed by both parties, then the regional PAD conducts further negotiations in the form of determining the date of implementation of the land acquisition payment and making the minutes of negotiations with the company, the area of land acquired, the land acquisition value agreed upon as the basis for joint acquisition payment participatory mapping between the company and the land title holders (and witnessed by relevant stakeholders if possible) showing the agreed location as part of the FPIC process and the maps made signed by both parties as a sign of agreement.
4. Payment of compensation must be witnessed by internal parties and representatives from the task force which includes: Chairperson of the Dayak Customary Council, *Demang, Camat, Polsek and Danramil* and a list of the compensation

<p>witnesses is present.</p> <p>5. Payment of land acquisition funds is carried out after the documents are signed. The land rights holder signs documents such as:</p> <ul style="list-style-type: none"> a. Land Compensation agreement. b. Declaration of land belonging to the former fields. c. <i>GRTT</i> / Land payment receipt. d. Measuring letter. e. Maps that have been made and agreed on together (using the principle of participatory mapping). <p>6. The regional PAD ensures that the entire land acquisition payment administration process is documented and bound into a land acquisition book for each company / estate and a land acquisition master map is also attached that illustrates all the acquired parcels.</p> <p>7. In the process of calculation and payment of regional PAD compensation, ensuring that in all payments all parties get the same rights without discrimination, whether ethnic, religious, racial, class or gender.</p> <p>8. If negotiations on the conflict resolution process are not agreed upon by the two parties with a frame, the process of resolving land conflicts is carried out through legal channels and the provisions in force in Indonesia.</p>	
<p>Status: Comply</p>	
<p>4.7</p>	
<p>Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.</p>	
<p>4.7.1; 4.7.2 and 4.7.3.</p>	
<p>The company showed procedure regarding the handling of land disputes with the number BGA-SO-ASM 25 - RO endorsed by the Regional Head January 2, 2020. This procedure describes the process of settlement of land conflicts which aims to create a standard in the process of compensation for crops and land throughout the BGA Group operational area and minimize errors in the implementation of compensation and land to save the company assets. The procedure has been explain how to calculate and distribute fair compensation and this procedure has been socialized to the stakeholders.</p> <p>Based on interview with representatives of Harapan Manis Sub-village and previous landowners from (Seriam Village) consist of 5 people, the land compensation has been implemented according procedure of Indemnity of Planting and Area. The company provides opportunities for the local community to work together to develop plantations by employing local contractors such as vehicle rental and others.</p>	
<p>Status: Comply</p>	
<p>4.8</p>	
<p>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.</p>	
<p>4.8.1; 4.8.2; 4.8.3 and 4.8.4.</p>	
<p>Based on interview with representatives of Harapan Manis Sub-village and previous landowners (Seriam Village) 5 people, its known every each compensation for land has been replaced by the company and FPIC has been carried out in accordance with applicable procedures, a copy and agreement have been mutually agreed. Until the surveillance audit conducted there are no disputes and land claims process.</p> <p>The results of the verification document can be shown on the document of the acquisition of land rights shown by the company in the document <i>REKAPITULASI PERMOHONAN DANA GRTT – WILAYAH VII</i> "for the period 2008 - 2015 with a total area of 6,725.66 hectares, to 480 households. There is document Land compensation map with a scale of 1: 2,341 (datum WGS84, Projection UTM, Zone S49, grid: UTM Grid) made by the GIS department for region 7 in 2016.</p>	
<p>Status: Comply</p>	
<p>PRINCIPLE #5 SUPPORT SMALLHOLDER INCLUSION</p>	
<p>5.1</p>	
<p>The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.</p>	
<p>5.1.1.</p>	
<p>The FFB price for Agro Seriam Mandiri Cooperative is according to Plantation Agency of Kalimantan Barat Province. The CH</p>	

was shown minute of FFB price determining on period II of September 2019 dated 30 September 2019 by the Plantation Agency. Oil palm with planted between 10 to 20 year is Rp 1,346.18/Kg. The CH also showing FFB payment with period of July to September 2019 dated 1 November 2019 (signed by Area Controller 7A, Cooperative Board and Witnessed). Based on interview with Head of Agro Seriam Mandiri Cooperative sighted that the payment of FFB was conducted every three month. The profit-sharing report was explained about bruto and netto FFB production, while the profit sharing is 20% from netto production. It still accordance to MoU between the company with Agro Seriam Mandiri Cooperative number 01 ADD1/SPK-ASM/VIII/2010 Clausul 6 about Obligation and Right, point 6.2.5.

5.1.2.

Based on interview with Head of Agro Seriam Mandiri Cooperative sighted that there are monthly meeting between company and cooperative, it was explain about updated price from government and actual production of smallholders. For example: minute of meeting between company and cooperative dated 12 November 2019.

5.1.3.

The FFB price for Agro Seriam Mandiri Cooperative is according to Plantation Agency of Kalimantan Barat Province. The CH was shown minute of FFB price determining on period II of September 2019 daetd 30 September 2019 by the Plantation Agency. Oil palm with planted between 10 to 20 year is Rp 1,346.18/Kg. The CH also showing FFB payment with period of July to September 2019 dated 1 November 2019 (signed by Area Controller 7A, Cooperative Board and Witnessed). Based on interview with Head of Agro Seriam Mandiri Cooperative sighted that the payment of FFB was conducted every three months. The profit-sharing report was explained about bruto and netto FFB production, while the profit sharing is 20% from netto production. It still accordance to MoU between company with Agro Seriam Mandiri Cooperative number 01 ADD1/SPK-ASM/VIII/2010 Clausul 6 about Obligation and Right, point 6.2.5.

5.1.4.

The CH was shown agreement between company with Agro Seriam Mandiri Cooperative number 01 ADD1/SPK-ASM/VIII/2010 for smallholders' development with area 1,321 Hectare, time period of this agreement is 30 year with full manage system. Based on interviews with management of cooperative and scheme smallholders, it is known that contract agreement are fair, legal and transparent. While the document verification

5.1.5.

The CH was shown agreement between company with Agro Seriam Mandiri Cooperative number 01 ADD1/SPK-ASM/VIII/2010 for smallholders' development with area 1,321 Hectare, time period of this agreement is 30 year with full manage system. Based on interviews with management of cooperative and scheme smallholders, it is known that contract agreement are fair, legal and transparent.

Therefore based on document verifications there are 7 contractors who have cooperation with the unit of certifications for activities in transportation (CPO, kernel, FFB, laterite transport and heavy vehicle). For example: agreement letter number 096-PRWTN/ASML-PRYE/LKL/11/2019 with CV Agro Seriam Mandiri dated 16 November 2019 till 15 December 2019 for laterite transport on PRYE. The contracts are fair, legal, transparent and have been agreed timeframe.

5.1.6.

The CH showing FFB payment with period of July to September 2019 dated 1 November 2019 (signed by Area Controller 7A, Cooperative Board and Witnessed). Based on interview with Head of Agro Seriam Mandiri Cooperative sighted that the payment of FFB was conducted every three months. The profit-sharing report was explained about bruto and netto FFB production, while the profit sharing is 20% from netto production. It still accordance to MoU between the company with Agro Seriam Mandiri Cooperative number 01 ADD1/SPK-ASM/VIII/2010 Clausul 6 about Obligation and Right, point 6.2.5.

Therefore based on agreement letter number 096-PRWTN/ASML-PRYE/LKL/11/2019 with CV Agro Seriam Mandiri dated 16 November 2019 till 15 December 2019 for laterite transport on PRYE. Based on interview with board of CV Agro Seriam Mandiri sighted that agreed payments are made in a timely manner or receipts specifying price, weight, deductions and payment system in accordance to the agreement.

5.1.7.

Based on interview with Head of Administration Pembangunan Raya Mill sighted information that weighbridge calibration has

been conducted Metrologic Terra by Government every year. The latest activity was conducted on 18 January 2020 including: Corner Load Mass Testing, Calibration Standard, Mass Verification Test, and installing of government stamp. The CH also showing Testing Result Letter Number 003/SKHP/MET-THE//2020 dated 21 January 2020 for Weighbridge Number E125150437 and Letter Number 004/SKHP/MET-THE//2020 dated 21 January 2020 for Weighbridge Number 123650401 form Cooperative, Small and Medium Business, Trade and Industry Agency of Ketapang Regency.

5.1.8.

Based on document verification and interview with weighbridge operator sighted that there are no independent smallholder in surrounding of company. This information also in accordance to interview with the Head of Agro Seriam Mandiri Cooperative.

5.1.9.

The CH has Communication and consultation procedures are explained in the communication procedure with no. ASM-SUST-SOP-08-R1, Revision No. R1 on 14-02-2017. The procedure has been socialized to stakeholders on 25-02-2017 by the CSR Department and Sustainability Department. The company also has a communication forum by involving stakeholders (Strategic Social Handling Forum). Based on interview result with Head of Agro Seriam Mandiri Cooperative sighted that there are no grievances and complaints during last year.

Status: Comply

5.2

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

5.2.1.

The CH has list of smallholder's member of Agro Seriam Mandiri Cooperative with 660 members. The Agro Seriam Mandiri Cooperative has included to RSPO Certification scope since initial assessment. Based on above explanation sighted that the CH has support to improve livelihoods the smallholder's member with conducted RSPO certification.

5.2.2; 5.2.3; 5.2.4; 5.2.5.

Based on field observation and interview with Head of Agro Seriam Mandiri Cooperative sighted that there are no independent smallholders. Actually, there is only scheme smallholders with full managed scheme, and it has been included to the RSPO certification scope.

Status: Comply

PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS
6.1

Any form of discrimination is prohibited.

6.1.1

The Company has policies related to equal opportunities and treatment to obtain employment opportunities in the Internal Office Memo Document (No: 383/Reg 4B/X/2019) concerning Child Protection Policy and Women Workers, Same Policies and Opportunities in Employment Opportunities (Human Rights) and the Association and Gathering Policy which is valid on 1 September 2019. The policy explains among others:

- BGA Group management prohibits the employment of children under age (less than 18 years) working or employed which can endanger the safety, health and morals of children. This also applies to contractor workers.
- BGA Group management is committed to protecting the reproductive rights of women workers by strictly prohibiting female workers, both PTH, PTT and contract workers who, during pregnancy and / or breastfeeding, work and or are employed using chemicals (pesticides / fertilizers) if there are pregnant workers in place the work can be done in the form of transfer or transfer to other work that is not related to chemistry.
- BGA Group management protects every workers from all forms of violence and sexual harassment.
- BGA Group management provides equal opportunities and treatment by not differentiating race, ethnicity, religion, nationality, disability, gender, sexual orientation, union membership, and political affiliation.
- BGA group management has given freedom the employee to make a worker union and or to be a member of worker

union.

The policy can be easily accessed by the public because it includes information that can be freely accessed. The implementation of the policy can be seen from the composition of employees which is a combination of migrants and surrounding communities with ethnic and religious diversity.

Based on the results of interviews with worker union and spraying worker, It is known that the company has given the same treatment to every employee, there is no issue related discrimination. There has never been a difference based on the similarity of origin and similarity of trust.

6.1.2

The company has presented the Labor Statistics document for the January 2020 period. Based on this document, it is known that workers come from various religions, gender and ethnicity. The distribution of tribes include Java, Batak, Sundanese, Dayak and etc. Beside that, based on interview it is known that there is no discrimination issue and explained that in the recruitment activities there were no recruitment fees.

There are no migrant workers in the company's operational area. Although they come from various regions, migrant workers still come from one country (Indonesia).

6.1.3

The Company has policies related to equal opportunities and treatment to obtain employment opportunities in the Office Memo Internal Document (No.:001/ASM-SUST/V/2018) concerning Child Protection Policy and Women Workers, Same Policies and Opportunities in Employment Opportunities (Human Rights) and the Association and Gathering Policy which is valid on 31 May 2018.

Promotion, Employee Assessment and Appointment of Employees

- Work Agreement No.03/ASM-BRYE/SK/II/2019 dated on February 8, 2019 states Daily Worker with initial H from those who were previously contract employees have been appointed as permanent employees as of February 8, 2019.
- Work Agreement No.045/SK-UPAH/ASM-PRYE/III/2018 dated on March 8, 2018 states Daily Worker with initial N from those who were previously contract employees have been appointed as permanent employees as of March 8, 2018.

6.1.4

A pregnancy test conducted by the company is not discriminatory but is a form of protection of the reproductive rights of women workers, for example in the case of taking H-1 and H-2 leave. Pregnancy test is carried out once a month by means of urine testing. In addition, H-1 monitoring is always carried out. If a female worker is found to be pregnant, it will be transferred to light work such as child care. Pregnant and nursing mothers are not allowed to do work that is in direct contact with pesticides and fertilizers.

Based on interview with sprayer and manuring operator, the workers said that pregnancy test was conduct every once a month for all the spraying worker. The worker said the pregnant test was helping the worker to ensure of their capability handling the chemicals.

6.1.5

Unit of certification had already a Gender Committee. The purpose of this organization is to facility women worker know related gender issue. Board of gender committee management namely:

- Committee Head : Theodora Kristiana
- Secretary : Mestika Sinaga
- Coordinator : each one person who is a representative of each affiliate and representative of each emplacement

In addition to the women's committee, attention to the development and empowerment of women. Gender committee programs such as :

- Routine Meeting of Member

- Socialization related to the prevention of sexual harassment in the company area
- Dissemination of employee complaints report procedures

Based on the results of interviews with women workers, it is known that routine activities carried out by the gender committee such as the socialization of gender committee, reproductive rights, labor day checks, daycare checks routine children and socialization about reproductive health.

6.1.6

The company has shown the payment salary document for all the worker and that state on *Daftar Gaji Karyawan* document. Based on that document, there is no issue related salary. The payment was equivalent for the same scope of work. For example :

Salary Document for SKU

Employee Number : 13000162

Basic Wage : Rp 2,638,000

Premium : Rp 1,698,000

Employee Number : 17000015

Basic Wage : Rp 2,638,000

Premium : Rp 1,540,000

Based on interview with spraying worker and mill security, the worker said that salary payment was following the District Basic Wage (Rp 2,638,000) and there is no difference between male or female worker. Thus it can be concluded that the wages received by each worker are equivalent to their position, years of service and expertise.

Status: Comply

6.2

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

6.2.1

The company has a Inter Office Memo No. 001 /IOM-A/HC-BGA/I/2020 wage determination by the company has referred to the government wage stipulation of Rp 2,860,323.60.

Based on interview with contractor (Agro Seriam Mandiri), it is know that the contractor was pay regarding the government wage stipulation.

Beside that, the unit of certification can present several efforts to ensure the fulfillment of the legal aspect for contractors among others OHS, minimum wages, BPJS and etc.

6.2.2

The rules of the labor force that are used and agreed upon are in the form of company regulations. The contents of the company regulations themselves include the following:

- CHAPTER I: General
- CHAPTER II: Work Relationship
- CHAPTER III: Bipartite Forum
- CHAPTER IV: Social Insurance System
- CHAPTER V: Holidays, Leave and Permission to Leave Work
- CHAPTER VI: Work & Disciplines Rules
- CHAPTER VI: Work Rewards
- CHAPTER IX: Rights and obligations due to termination of employment
- CHAPTER X: Protection and Safety Work
- CHAPTER XI : Family Plan and Cooperative
- CHAPTER XII : Closing

The basis for remuneration used by the company is in reference to the Decree of the Governor of West Kalimantan regarding the stipulation of the Minimum Wage No. 1377/Disnakertrans/2019 Regency Minimum Wage that was set was Rp 2,638,000.

The company has a Inter Office Memo No. 001 /IOM-A/HC-BGA/I/2020 wage determination by the company has referred to the government wage stipulation of Rp 2,860.323.60. Beside that, the company also always set wage scale according to the group that will be re-set every year, namely 2020 period, the lowest wage in group P8 is Rp. 2,900,500 while U1 group's lowest wage is Rp. 3,065,500. The difference is influenced by years of service and class of employees.

The company also shows examples of work agreements for example with employee number 13000162. The clauses in the employment agreement regulate the rights and obligations of workers such as working time, wage system, BPJS programmed, termination of employment and facilities obtained.

6.2.3

Based on interviews with bipartite institution, mill workers (Sterilizer Stations, Boilers, Kernels and Engine rooms) and Harvest Workers, it is known that the company has implemented company regulations properly such as issues regarding working hours, wages, overtime calculations, leave annual leave, pregnancy leave, H-1 policy and other predetermined rules. There is no issue related wages and overtime.

Based on document verification to the worker initial S (Employee Number 13000162) and initial S (Employee Number 17000015), it is know that the company give a premium to the generator operator every month. In actual, the operator was working overtime equal for one hours (stated on Premium Minutes) that endorsed by Estate Manager and pay amount Rp 30,000. The payment has exceeded the minimum rules specified. The minimum overtime premium based on regulation is Rp 22,872.83/hour (overtime). It can conclude that the company has pay the overtime accordance with regulation.

The legal fulfillment of labor obligations such as the rules of working hours, overtime rules and other industrial relations issues is ensured by the KTU (*Kepala Tata Usaha*) team. Meanwhile the fulfillment of the reproductive rights of women workers is monitored by the HS team with clinical assistance.

6.2.4

The welfare facilities and infrastructure provided by the company to its workers include residential houses, religious facilities, sports facilities and other welfare facilities such as day care facilities, clean water facilities, and availability of electricity. In addition there are also health post facilities.

Based on the results of interviews with daycare worker and field visit to housing complex, it is known that the housing conditions are in good condition. Waste is managed and will be disposed of in landfills. Sanitary conditions are in good condition and there are no blocked waterways.

6.2.5

Based on the results of interviews with residents of housing employees, representatives of gender committees and worker unions it is known that access to food can be easily reached. The distance from the unit to the regency city is around 1 hour. Periodically there are sellers of food ingredients, especially for vegetables and side dishes that enter the plantation area at the most every two weeks. In addition there is also Cooperative, which one of the fields of business is in terms of supplying basic goods (basic needs) Based on this it can be concluded that the certification unit has made efforts to improve workers' access to getting decent, adequate and affordable food.

6.2.6

The company has shown PT ASM's Decent Living Wage Fulfillment Checklist document which contains elements of available facilities, information and document / record references. The elements of the facility include employee wages, food and beverages, clothing, housing, education, health, transportation, recreation and savings. Eligible Wage Calculation Document (Implementing DLW).

The company has not been able to show evidence that the implementation plan in the operational perspective has been made in accordance with the guidelines of the RSPO Guidance For Implementing A Decent Living Wage. **It is become as non conformity No. 2020.07 with Non Critical category.**

6.2.7	Based on a review of documents and interviews with representatives of bipartite, it is known that the composition of employees in the certification unit is PTT and Training Worker. Training worker itself is a term for a trial employee (3 months) and is declared successful in qualifying to become a permanent employee. PTTs are also permanent employees but are intended for implementing employees. Thus can be concluded that all core work has been carried out by permanent/full time workers.
6.2.6	Status: Non conformity No. 2020.07 with Non Critical category.
6.3	The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.
6.3.1; 6.3.2	<p>Based on the results of the document review, the company has policies related to freedom of association in the Company Policies Period 2018-2020, especially in clause 21 about Bipartite forum, which consist:</p> <ul style="list-style-type: none"> - Companies and workers jointly hold bipartite forums. - The composition of the membership and the time of the bipartite forum meeting refers to the applicable labor regulations. <p>The company also had Worker Union of PT Agro Sejahtera Manunggal which has been registered with the Manpower and Transmigration Agency of Ketapang District on March 29, 2018 (No.046/2018) with no. Registration 183 / OP-SBTP / SPM-PT. ASM / DFT / 2018. One of the meeting documents record shown by the company was the meeting of the formation of the PT ASM Independent Workers' Union on June, 2019 which was also attended by company representatives (estate managers and field assistants).</p> <p>Based on interview with bipartite institution, there's no intervention by Company, every workers has rights to choose representative in bipartite.</p> <p>6.3.3</p> <p>Based on the results of interviews with Bipartite Institution, it is known that the management does not interfere with the formation or activities of bipartite institution. The bipartite representatives are freely chosen for all workers or contract workers.</p>
	Status: Comply
6.4	Children are not employed or exploited.
6.4.1; 6.4.2; 6.4.3 and 6.4.4	<p>The policy regarding the age limit of workers is contained in the company regulations 2018-2022 article which states that one of the requirements in the recruitment process is adults and at least 18 years of age at the time of admission. In addition, a work contract with a clause contractor without child labor has also been included.</p> <p>The unit of certification has also made warnings related child labor including prohibition of employing workers under the age of 18 years. The implementation such as making a warning sign at security post, residential area and block area regarding the prohibition of employing workers under the age of 18 years.</p> <p>Based on interviews with worker in estate and mill, it is known that socialization regarding the minimum ages of workers is always conveyed, both through morning briefings and when working. In addition there is regular supervision from staff to ensure compliance with these policies. The results of a list of employee registration documents, employee interviews and site visits revealed that there were no workers under the age of 18. But the company has the opportunity to ensure that recruitment of workers does not violate the minimum age limit. This is because there is worker who are exactly 18 years old at the time of recruitment (OFI).</p>
	Status: Comply
6.5	There is no harassment or abuse in the workplace, and reproductive rights are protected.
6.5.1; 6.5.4	

Company has a policy to prevent all forms of sexual harassment and violence in the Sexual Harassment procedure number BGA-SOP-HC-311.2-R0. The procedure describes documentation of complaints, handling victims, protecting victims, witnesses and perpetrators, investigating and sanctions. The policy has been socialized to the worker in each unit through Gender Committee. Gender committee function is to handle the protection of female workers rights. Based on interview with gender committee of PT ASM, company provided daycare for all workers' children and also give maternity and menstrual leave for female workers.

In addition, on IOM (Intern Office Memo) No.: 175/AC-IV/X/2013 dated October 22, 2013 also inform about Company responsibility related to women worker work at night. The policy describes:

- Unit manager are prohibited from employing pregnant women employees who according to doctors' information is harmful to their health and safety and if they work between 11:00 p.m. to 07:00 a.m.
- Unit Manager who employ female employees between 11:00 p.m until 07:00 a.m. are obliged to provide nutritious food and drink (fulfill 1,400 calories) given directly, maintain decency and security during the workplace.
- Unit Manager are obliged to provide shuttle transportation for female employees who leave and go home from 11:00 p.m to 05.00 a.m.

Certificate holder also has procedure for handling the complaint No. ASM-SUST-SOP-40, on 3rd January 2017. It explain about the mechanism of handling the complaint from external and internal party. Company also has a mechanism to protect the identity of complainant (whistleblower). The worker can make complaint through complaint channel by phone, SMS or email. The mechanism has socialized to the worker through signboards all over the unit.

Based on the results of interviews with women workers in Estate and Mill, it is known that during the 2019 period there were no issues regarding sexual harassment and violence. Women workers also know about the existence and function of the women's committee and the field of women's union empowerment.

6.5.2

The Company has policies related to equal opportunities and treatment to obtain employment opportunities in the Office Memo Internal Document (No.:001/ASM-SUST/V/2018) concerning Child Protection Policy and Women Workers, Same Policies and Opportunities in Employment Opportunities (Human Rights) and the Association and Gathering Policy which is valid on 31 May 2018. The policy explains among others:

- BGA Group management is committed to protecting the reproductive rights of women workers by strictly prohibiting female workers, both PTH, PTT and contract workers who, during pregnancy and / or breastfeeding, work and or are employed using chemicals (pesticides / fertilizers) if there are pregnant workers in place the work can be done in the form of transfer or transfer to other work that is not related to chemistry.

Based on the results of interviews with women workers in Estate and Mill, it is known that the policy has been implemented such as the transfer of pregnant and breastfeeding workers to lighter jobs and not in direct contact with chemicals. In addition, the provision of menstruation and birth dayoff has also been given to workers in accordance with the actual conditions and targeted by the medical team.

6.5.3

Based on field visit and interview with worker (especially young mother) in Estate and Mill, it is known that the unit of certification was accommodate young mother needs especially privacy in breastfeeding to children, beside that company provide a special place for breastfeeding. In addition, information obtained from young mothers is given a special time for 1 hour to provide breastfeeding for their children. May be done at breastfeeding corner and their respective homes.

	Status: Comply	
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6.6

No forms of forced or trafficked labour are used.

6.6.1 and 6.6.2

Based on document verification and interview with worker, it is known that there is no migrant worker in the company. All the worker are from one nation (Indonesia) and has a work contract. Beside that, they said that there is no force labor. Workers' rights and obligations are also clearly stated in company regulations.

	Status: Comply	
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6.7

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

6.7.1

The management unit has guiding committee for occupational health and safety organization and personnel in charge on implementing the occupational health and safety program. Guiding Committee of Occupational Safety & Health Board has drafted an OHS working program and evaluates the implementation of OHS program in the field. In order to ensure that the OHS program has been implemented effectively, the board of Guiding Committee of Occupational Safety & Health performs a monthly meeting with workers. The interview result with Manpower and Transmigration Agency in Ketapang Regency revealed that the management unit has submitted the guiding committee for occupational health and safety's periodic report every 3 months. The guiding committee for occupational health and safety report covers the entire occupational health and safety activity within company's operation activity.

The P2K3 structure shown by the company is according to Decree of the Head of the Manpower and Transmigration Office of West Kalimantan Province No: 79/P2K3/WASNAKER/2019 concerning the Approval of P2K3 of PT ASM on 9 September 2019. Beside that, the P2K3 team holds regular meetings every month to formulate a P2K3 quarterly report that is routinely sent to the relevant agencies. The contents of the discussion include discussing the OHS work program, evaluating if there are work accidents, OHS Inspection, recording routine meetings, the results of periodic health checks, and a list of company employees as a basis for monitoring OHS plans.

6.7.2

Unit of certification has a procedure for emergency response, for example Procedure of First Aid, Procedure of Handling Accidents and Work Diseases and Procedure of Emergency Preparedness. Based on field observation to Mill and Estate, it was found that hydrant, fire extinguisher, first aid box were properly monitored and maintained. Moreover, hydrant was satisfactory works during simulation. Based on field visit, company has pointed the evacuation path and concentration point in order to smooth the evacuation process in emergency situation. The evacuation path is available in office and mill and has been completed with map and other *signboards*. At the time of the field visits it is known that in the mill, warehouse, workshop and division offices have supplied First Aid box which monitored regularly.

As for the operational activities in the field, supervisors was carrying first aid kits during his work in the field, and mill was also equipped with first aid kits. Based on interview with supervisor, it is known that he understood the first aid mechanism in case of emergency.

6.7.3

Based on the results of field visits on Estate and Mill (operational activities), it is known that PPE has been provided free of charge for each worker. PPE given is adjusted to the location and type of work provided, for example at the Sterilizer station, PPE is given in the form of safety shoes, masks, and helmets. In spraying activities, PPE is given in the form of face shields, gloves, boots, aprons, and masks while PPE is given in the form of helmets, shoes, and glasses. This is also in accordance with the risk analysis documents owned by the company.

The company also shows the OHS compliance inspection document which is carried out every month by the EHS team. In addition the company has also actually provided a reserve PPE stock for both estate and mill workers such as helmets, masks, boots, safety shoes, etc. Based on field visit to warehouse in Estate, it is know that there are PPE stock such as helmet, shoes and rubber gloves. Beside that, based on interview with sterilizer worker (Mill), it is know that the worker get a PPE for free and the company will replace the broken PPE immediately.

6.7.4

The form of health protection and work accident insurance provided by the company is in the form of the inclusion of all employees in the *BPJS ketenagakerjaan* and *BPJS Kesehatan* programs.

The company has shown the Audit document List of Legal and Regulatory Provisions and Regulations No: 004 / ASM-LR / XI / 2019 Rev 4 dated 18 November 2019 which was approved by Region Head 4B. The document states that it has fulfilled Government Regulation No. 14 of 1993 juncto No. 84 of 2013 concerning the Implementation of Social Security article 9 paragraph 2 which states that contributions to work accident insurance, death insurance and health care insurance are fully borne by employers. Beside that, document of the number of BPJS Health PT ASM 2019 which states that the average number of BPJS Health participation is 8% of the total workers. In addition there is a target of registration in Phase-1 2020 is 25% of the number of members. Based on interviews with local contractors (Angkut TBS - Agro Seriam Mandiri), there are 8 drivers who do not have health insurance (information is currently on progress, but progress cannot yet be demonstrated). The company has not been able to demonstrate that all workers are provided health care and are covered by accident insurance in accordance with applicable regulations. **It is become non conformity No. 2020.08 with Non Critical category.**

6.7.5

The recording of work accidents has been done regularly and is always recorded in the P2K3 report which is reported routinely every quarter to the relevant agency. In addition the company also has an annual LTA calculation table for each unit (mill and estate). The person in charge of LTA calculation is the P2K3 team with the main PIC being the P2K3 secretary who has taken OHS training.

6.7.4 Status: Non conformity No. 2020.08 with Non Critical category.

PRINCIPLE #7 PROTECT, CONSERVE AND ENHANCE ECOSYSTEMS AND THE ENVIRONMENT
7.1

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

7.1.1

The IPM plan is shown in the pest and disease control procedures contained in the Palm Oil Agronomy Standard Operating Procedure (BGAAGRKS-SOP-I) prepared by the Procedure Committee consisting of the Steering Committee of Plantation and Organizing Committee of Plantation which was then approved by the director on January 4, 2011, in volume 3 Pest and Disease Control No. BGAAGRKS-PTKS-PHT SOP.

The procedure explains integrated pest and disease control by integrating biological pest control to reduce the use of pesticides and implementing an early warning system so that there is no preventive pest control.

Based on the results of interviews and field visits to BLRE, BRYE, and PRYE there are no known pest attacks that require chemical control. The biological control of caterpillars that feed on palm leaves is done by planting *Turnera* and *Antigonon leptopus* as hosts for natural enemies, while for controlling rats the company carries out biological control by making owl cages.

7.1.2

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

7.1.3

The company has SOPs related to pest control as stipulated in BGAAGRKS-SOP-01 Volume 2 SOPs namely BGAAGRKS-SOP-10 which describes pest / disease control techniques that are biological, manual, mechanical, technical or chemical culture and control time that are considered most suitable will be motivated by the intended understanding or life cycle. The life cycle of the weakest pest / disease can be used as a critical point which is a reference for control decisions. Based on interviews with company management, pest control was never carried out by burning or using fire. Based on the results of field visits at BLRE, BRYE, and PRYE there were no traces of the use of fire as pest control.

Status: Comply

7.2

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

7.2.1

The integrated pest control plan is contained in the Palm Oil Agronomy Standard Operating Procedure (BGAAGRKS-SOP-I) prepared by the Procedure Committee which consists of the Steering Committee of Plantation and the Organizing Committee of Plantation which was then approved by the director on January 4, 2011, in Volume 2 No. BGAAGRKS-PTKS-PHT SOP Control of Pests and Diseases that explains integrated pest and disease control by integrating biological pest control and other methods besides being a pesticide to reduce the use of pesticides and implementing an early warning system with a detection system so that there is no pest control disease preventive.

Reduction in the use of pesticides can be seen when implementing integrated pest control and with an early warning system with the detection of pests and diseases so that there is no prophylactic use in the use of pesticides. One of the reduction in other pesticides is to not use pesticides with active paraquat as indicated in Internal Agriculture & Technical Circular No. 016 / IOM / RSC / I / 2015 dated May 9, 2015 from the Head of Palm Oil Research concerning notification not to use pesticides 1A, 1B and Paraquat.

In Internal Agriculture & Technical Circular No. 016 / IOM / RSC / V / 2015 dated May 9, 2015 regarding recommendations for the use of Herbicides for selective weeding and for the circle and harvesting path, it can be seen that the use of pesticides starting from plants <4 years, 4-7 years and > 7 years has been planned to be reduced.

Based on field observation results in division IV BRYE with block number D56 / D57 and interviews with 3 spray workers, it is known that the spray workers have understood their technical work such as dosage, types of active ingredients used, target weeds and spraying should not be done in the area river border or near a body of water.

7.2.2

The pesticide application program is shown in the Palm Oil Agronomy Standard Operating Procedure (BGAAGRKS-SOP-I) compiled by the Procedure Committee consisting of the Plantation Committee and the Organizing Committee Plantation which was then approved by the director on January 4, 2011 in volume 2 of Weed Control No. BGAAGRKS-PTKS-PGL SOP and Pest and Disease Control No. BGAAGRKS-PTKS-PHT SOP

Weed control in accordance with the target weed in the field as well as integrated pest and disease control by integrating biological pest control to reduce the use of pesticides and implementing an early warning system so that there is no preventive pest control.

The company has a complete list of Pesticides belonging to the Class 1A or 1B World Health Organization category. The company also does not use pesticides with active paraquat as indicated in Internal Agriculture & Technical Circular No. 016 / IOM / RSC / I / 2015 dated May 9, 2015 from the Head of Palm Oil Research concerning notification not to use pesticides 1A, 1B and Paraquat. If when the Internal Agricultural & Technical Circular is determined and there are still stocks of pesticides 1A, 1B and Paraquat in the warehouse are allowed to use these pesticides until the stock runs out.

The company has shown data on the use of pesticides for the last three years of use in BLRE, BRYE, and PRYE. The data explains matters related to the amount of chemical usage, LD 50 content, active ingredients, and chemical use per hectare. For example the use of Racumin (Coumatetralyl active ingredient) in the May 2019 period in PRYE with a total usage of 0.97 kg per hectare (3011 kg of usage with a control area of 3099.55 hectares) with LD 50 (mouth) 1000 mg / kg BW and LD50 (skin) 4000mg / BW.

7.2.3

The company has shown data on the use of pesticides three years ago (2017, 2018, 2019) in BLRE, BRYE, and PRYE. Based on data and explanations from management, the company no longer uses pesticides with paraquat active ingredients to control weed ferns. To control weed fern is carried out by the use of pesticides with ammonium glyphosate. Besides that, there has also been a decrease in the use of rodenticide because the company has developed a rat pest predator, the owl (*Tyto alba*). The company has the opportunity to evaluate IPM plans to reduce the use of chemicals for rat pest control because the company has been controlling rat pests by breeding owls as natural predators so that the use of rodenticides with active ingredients Coumatetralyl and Brodifacum (IA / IB class pesticides) can be increasingly reduced or may be eliminated. **OFI**

7.2.4

Based on interviews with company management, it was explained that there was no prophylactic use of pesticides. The use of pesticides is used as needed based on the results of field observations.

7.2.5

Companies that have a complete list of Pesticides that are in the Class 1A or 1B World Health Organization category. The company also no longer uses pesticides made from paraquat active as indicated in Internal & Circular Technical No. Agriculture. 016 / IOM / RSC / I / 2015 dated 9 May 2015 from the Head of Oil Palm Research on requesting not to use pesticides 1A, 1B and Paraquat. If at this time the Internal Agricultural & Technical Circular is determined and still has a stock of pesticides 1A, 1B and Paraquat in the warehouse are allowed to use these pesticides until the stock runs out.

The company has shown data on the use of pesticides three years ago (2017,2018,2019) in BLRE, BRYE, and PRYE, as follows:

Pesticide	Active ingredients	Unit	LD 50		Volume		
			Oral	SKin	2017	2018	2019
			mg/kg bb	mg/kg bb	Kg/Ltr/Gr/Sch	Kg/Ltr/Gr/Sch	Kg/Ltr/Gr/Sch
Basta	Amonium Glifosinat	Liter	>5000	>5000	1,125.00	61.00	3,307.25
Rose Up	Glyphosat	Liter	>5000	>5000	11,534.80	8,220.00	14,326.80
Metafuron 20 WG	Methyl 2	Gram	>5000	>2000	1,710.00	533.00	1,588.00
Kixor	Saflufenasil	Gram	>5000	>5000	-	497.00	18.00
Cyperin	Sipermetrin	Liter	231,9	1026,66	396.00	118.00	7.00
Weed Solution	Adjuvant	Liter	3310	1060	-	-	1,363.00
Becano	Indaziflam	Liter	>2000	>2000	-	-	9.00
Racumin	Coumatetralyl	Kg	1000	4000	-	4,279.00	3,375.00
Klerat	Brodifakum	Kg	0,3		6,800.00	7,208.00	3,458.00
Feromonas	4 Etil oktanoat	sch	>5000	>5000	226.00	262.00	299.00
Furadan	Carbofuran	Kg	8	6783	6,962.00	5,037.00	10.00

Based on data and explanations from management, the company no longer uses pesticides with paraquat active ingredients to control weed ferns. To control weed fern is carried out by the use of pesticides with ammonium glyphosate.

7.2.6

The company has a Pesticide Management SOP described in the Palm Oil Agronomy Standard Operating Procedure (BGAAGRKS-SOP-I) prepared by the Procedure Committee consisting of the Steering Committee of Plantation and the Organizing Committee of Plantation which was then approved by the director on January 4, 2011 Volume 3, namely Pesticide Management No. BGAAGRKS-PTKS-PPS SOP.

The SOP is structured as an effort to avoid accidents or unwanted side effects. One effort to reduce these impacts is to classify pesticides according to their targets, how they work, chemical properties, reactions, formulations and toxicity levels. The SOP also explains the symptoms and anticipation of pesticide poisoning and pollution prevention and continuous improvement. The SOP also mentions several things such as pregnant and breastfeeding women who are prohibited from working in pesticide applications, officials must use the appropriate PPE.

The company has a SOP Corporate Communication and Sustainability Department on Personal Protective Equipment No. BGA-SOP-CCS-1106.1-RO document was endorsed by the Director on 28 November 2011. PPE is available to all workers in the workplace including high-risk work such as the application of pesticides and the PPE will be replaced by the company if damaged. The list of PPE distribution is recorded in the BGA-Form-CCS-1106.1-001-RO list of PPE Transfer Lists. Supervision

of PPE usage is recorded in BGA-Form-CCS-1106.1-002-RO Form PPE Inspection List.

Based on the results of field visits and interviews with spray employees it is known that workers are given rations twice a year. If there is damage outside the ration provided, the company still provides PPE replacement on condition that it shows a damaged PPE to be replaced.

The company has also conducted internal training / outreach regarding the handling of pesticides and hazardous chemicals. As an example:

- a. Minutes of the simulation of the BGA Grown Management System at Pembangunan Raya Estate , which was held on March 10, 2019, was located in Block B14 Division III, which was attended by 15 workers.
- b. Minutes of MSDS socialization activities in accordance with chemicals used in the construction of Raya Estate, which was held on October 17, 2019, which discussed the prohibition of underage child labor, commitments to protect the reproductive rights of women workers, socialization related to MSDS to new employees, and monthly checks. to women related to chemicals. This activity was attended by 15 workers.

Based on the results of field visits Circle Path and Harvesting Path Spraying in division IV BRYE block number E56/E57, it is known that spray workers have used PPE in accordance with company procedures namely glasses, aprons, boots, rubber gloves, and masks.

7.2.7

The company has a SOP for pesticide storage contained in the Agronomy SOP with No. Document BGAAGRKS-PROS-PPS-01 chapter Procedure for Pesticide Safety Guidelines on Storage of Pesticides which contains:

- Pesticide packaging that has just arrived has been given a date of purchase for the implementation of the FIFO principle
- Pesticides are stored in a special place, well ventilated and not exposed to direct sunlight
- Beware of fire hazards because some formulations are flammable
- Each type of pesticide must be placed separately according to the group
- Pesticides are stored in original containers that are tightly closed and do not leak
- Check the condition of the packaging regularly, the label containing the complete information is sealed with a clear colored solution
- When controlling the stock of goods in the warehouse, to measure the volume must use a special tool

The company also has a Pesticide Management SOP, which is described in Palm Oil Agronomy Standard Operating Procedure (BGAAGRKS-SOP-I) volume 3, which was approved by the director on 4 January 2011 with document No. BGAAGRKS-PTKS-PPS SOP.

The SOP explains:

- pollution prevention and improvement on an ongoing basis including by storing pesticides and mixing pesticides safely and without the potential to have health and environmental impacts.
- Pesticide waste management refers to the B3 waste management procedure.
- Packaging of used pesticides is destroyed by returning it to the central warehouse and
- Used pesticide packaging may not be used for other activities

Chemical management procedure ASM-SUST-SOP-14 dated 20 September 2015 which explains the location of storage must be far from sources of ignition or any area of the population, other than that if a leak or chemical spill occurs, safety measures must be taken to prevent leakage of chemicals according to countermeasures procedures and prevention of hazardous and toxic materials spills. In addition, it was also explained that the management unit would submit a written report on hazardous and toxic materials management periodically at least every 6 months to the relevant agencies.

Based on the results of the field visit to the chemical storage warehouse at BLRE, it was found that the chemical storage warehouse was in accordance with procedures owned by the company.

7.2.8.

During the audit activity there are some evidences, as follows:

1. Procedur ASM-SUST-SOP-52 about Hazardous Waste Management explain about specification of hazardous waste, hazardous waste license, hazardous waste places, and reused of hazardous waste and it recording. In addition, that

- there is also form document number BGA-Form-CCS-1101.1-006-R0 about reused of hazardous waste recording.
2. Based on field observation to the Belaban Raya Estate, Block B50 sighted there are chemical containers such as (Regent, Metaprima, Metafuron) disposed to the land with unproperly handling.
 3. Based on field observation to the hazardous waste store (satellite) in Bengkuang Raya Estate sighted that the specification are not in accordance to procedure and national regulations, for example: there are no emergency response facilities, no hazardous waste symbol and labels, no balance sheets and logbooks. In addition, the actual hazardous waste stock are used oil (1.5 drums), used oil drums (8 drums), used aprons: 1 drum, used chemical container (10 pcs), metaprima (1 sack), and several used lamps.
 4. Based on field observation to the hazardous waste store in PRYM sighted there are hazardous waste stock, such as: chemical container (20 pcs), metaprima (1 sack). However not yet recorded in the updated balance sheet and logbook.
 5. Based on interview result with the management sighted that chemical containers is using for distribute chemical on the field. There are also uses to distribute fertilizer to the field. However, there are no recording in accordance to BGA-Form-CCS-1101.1-006-R0.

Based on above explanation sighted that the chemical container management not comply with the procedure ASM-SUST-SOP-52. **It is become as non conformity number 2020.09 with Non Critical category**

7.2.9

Based on interviews with company management, it is known that the company does not spray by air

7.2.10

The company has shown a list of 64 employees handling chemicals, consisting of 29 spray workers and 35 fertilizer workers. Based results of the health examination obtained overall worker on normal results. Beside that, based on interviews with spray workers on block F42, BLRE is known routine employee health checks are always held. There is no skin disease or complaints of other diseases due to spray work.

The company has also shown a recapitulation of the results of medical check-ups of PT. Agro Sejahtera Manunggal budget year 2019 in which explains the name, age, sex, lab number, conclusions and medical advice. Medical check-ups are carried out by the Kimia Farma Clinical Lab.

7.2.11

The company has a Pesticide Management SOP described in the Palm Oil Agronomy Standard Operating Procedure (BGAAGRKS-SOP-I) prepared by the Procedure Committee consisting of the Steering Committee of Plantation and the Organizing Committee of Plantation which was then approved by the director on January 4, 2011 Volume 3, namely Pesticide Management No. BGAAGRKS-PTKS-PPS SOP.

The SOP is structured as an effort to avoid accidents or unwanted side effects. One effort to reduce these impacts is to classify pesticides according to their targets, how they work, chemical properties, reactions, formulations and toxicity levels. The SOP also explains the symptoms and anticipation of pesticide poisoning and pollution prevention and continuous improvement. The SOP also mentions several things such as pregnant and breastfeeding women who are prohibited from working in pesticide applications, officials must use the appropriate PPE.

The company has shown a list of 64 employees handling chemicals, consisting of 29 spray workers and 35 fertilizer workers. Based on the results of interviews with spray workers in BL42 F42 block, it is known that routine employee health checks and monthly pregnancy checks are always held. Arguing with the explanation from the employees, it is known that pregnant or breastfeeding women are not allowed to do chemical-related work, if there are pregnant or breastfeeding workers then it will be transferred to other care work.

7.2.8.	Status: Non conformity No 2020.09 with Non Critical category
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7.3

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

7.3.1.

Registry for waste (included toxic and hazardous waste) products that produced by mill and estates are identified and listed on waste identification document No 008/ASM-SUST/08/2018. For example: hazardous waste were kept at temporary hazardous waste storage and housing/domestic waste are managed by landfill. Based on field observation to the Landfill in Pembangunan

Raya Estate, Block A14 sighted that the domestic waste been disposed in accordance to the procedure.

7.3.2.

During audit activity there are several evidences, such as:

1. Procedure ASM-SUST-SOP-52 about hazardous waste management, explained about hazardous waste building, license submit, etc. There are also document BGA-Form-CCS-1101.1-006.R0 about reused of hazardous waste record.
2. Based on field observation to the Belaban Raya Estate, block B50 sighted there are metafuron and metaprima disposed to the land.
3. Based on field observation to the hazardous waste store (satellite) in Bengkuang Raya Estate sighted that the specification are not in accordance to procedure and national regulations, for example: there are no emergency response facilities, no hazardous waste symbol and labels, no balance sheets and logbooks. In addition, the actual hazardous waste stock are used oil (1.5 drums), used oil drums (8 drums), used aprons: 1 drum, used chemical container (10 pcs), metaprima (1 sack), and several used lamps.
4. Based on field observation to the hazardous waste store in PRYM sighted there are hazardous waste stock, such as: chemical container (20 pcs), metaprima (1 sack). However not yet recorded in the updated balance sheet and logbook.
5. Based on interview result with the management sighted that chemical containers is using for distribute chemical on the field. There are also uses to distribute fertilizer to the field. However, there are no recording in accordance to BGA-Form-CCS-1101.1-006-R0.
6. Based on RSPO internal audit result dated 14 January 2020 there are non compliance on indicator 7.3.2 about chemical container using not in accordance to the procedure. However, it still found on this assessment.
7. Based on field observation to the Generator Set room in PRYE sighted that there is generator with capacity 125 KvA placed on the soil and without pallet or concrit floor.
8. Based on field observation to the BRYE generator set room sighted that the pipe design on secondary containment not accordance to the adequate design to prevent environment pollution cases.
9. Based on field observation to the hanch and carry of *Elaidobious camerunicus* sighted that there used oil for prevention of another insect. The management unit also showing correction by changing the oil with salt water dated 20 January 2020.
10. The management unit showing hazardous waste management reporting period of October till November 2019 on January 2020 to the Environment Agency of Ketapang Regency. However, it not explained about hazardous waste balance and logbook in accordance to PP No 101 year of 2014.

Based on above explanation sighted that the waste management has not been to the procedure which understand by all workers and staff. **It was raised as non conformity No 2020.10.**

7.3.3.

Based on field observation to the Landfill in Pembangunan Raya Estate, Block A14 sighted that the domestic waste been disposed in accordance to the procedure. There is no open fire for disposal the waste. Therefore based on field observation and interview with daycare workers in Belaban Raya Estate sighted information that domestic waste were collected every week.

7.3.2.	Status: Non Conformity No 2020.10 (Non-Critical)
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7.4

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

7.4.1

Procedure related to soil fertility enhancement is presented in document No. SOP BGAAGRKS-PTKS-PMK dated January 4th 2011 about manuring, No. BGA-AGR-KS-SOP-05 dated May 25th 2011 Volume 1 about soil and water conservation, No. BGA-AGR-KS-SOP-09 dated May 25th 2011 Volume 2 about manuring and No. BGA-AGR-KS-SOP-16 dated May 25th 2018 Volume 3 about management on marginal soil. The procedure mentioned that manuring program should be based annual on leaf and soil analysis. in order to enhance soil pH on peat area, estate management has conducting water management, for example as seen in Divisi 2 Block F60 BLRE for subsidence pole monitoring and overflow through flap gate. Based on document review and field observation, it was known several strategy which already implemented by estate management for soil fertility enhancement and soil conservation, as follows:

- Manuring activities as seen in Divisi III Block I59 BLRE, Divisi I Block C41 BRYE and Divisi III Block B12 PRYE for NPK application, respectively.
- Selective weeding on the palm circle which aims to accelerate nutrient uptake by the palms as seen on Divisi 2 Block F41 BLRE
- To maintain land cover crop condition which planted by *Mucuna bracteata* and *Nephrolepis bisserata*, especially on peat and very sandy soil area.

Record of fertilizer application, included EFB mulching and land application were available. This indicate management strategy towards soil fertility improvement were satisfactory monitored. Furthermore, based on observation and interview with fertilizer applicators in Divisi III Block I59 BLRE, Divisi I Block C41 BRYE and Divisi III Block B12 PRYE, it was known that all applicators were able to explain and demonstrate their technical work, in accordance with the procedure, for example fertilizer placement, dosage, time of application, prohibited palms or area which prohibited to be manured (ex. riparian and conservation zone) and PPE to be used.

7.4.2

Procedure of leaf and soil sampling is presented in document No. 153/RSC-ADM/XII/15 dated December 7th 2015, while the mechanism is detailed explained in Internal Memo of palm Oil Research Head No. 004/IOM/RSC/III/15 dated February 1st 2015. Procedure mentioned that leaf and soil analysis were fully conducted annually. As noted, annual soil sampling was taken for about 20 % from total area which represent soil type on the particular estate.

Departement of Research fo Regional 7 which responsible for PT ASM agronomy matters, has able to shows leaf and soil testing results for BRYE, BLRE and PRYE. The results were used for manuring recommendation for period 2019. Among parameter tested on leaf analysis are dry matters of macro nutrients (N, P, K, Mg and Ca) and micro nutrients (B and Cu). Meanwhile, parameter tested on soil analysis are pH, texture, dry maters of macro and nutrients, N/K ratio, available P and cation exchange capacity. Those laboratory analysis results were used as consideration in the annual fertilizer recommendation calculation.

7.4.3

Operating Procedure Volume 1 No. BGAAGRKS-PTKS-PMK SOP on fertilization compiled by the Procedure Committee consisting of the Plantation Committee and the Plantation Committee which was then approved by the director on January 4, 2011.

The application of empty bunches and compost can enhance the decomposition process increasing the physical, biological and chemical soil content. Other benefits of empty bunches are increasing soil rejuvenation, reducing soil temperature, maintaining soil moisture, reducing the negative impact of plant growth and dry production, reducing nutrient losses in the process of washing surface runoff and reducing soil erosion in high rainfall areas. The criteria for the empty extension area are:

- Mineral soil (sandy)
- Flat ground until bumpy
- Not a lowly area and drainage must be good.

The company has shown the fertilizer planning and realization documents in PRYE, BRYE, and BLRE in 2019. The documents contain the amount and type of fertilizer used, the plan and realization of fertilization every month and the amount of fertilizer used per ton of tons produced, as well as the dose of fertilizer used. As an example of the realization of urea fertilization in 2019, there were 697.96 tons in PRYE, 339.50 tons in BRYE, and as many as 529.42 tons in BLRE. The total use of UREA fertilizer per ton of FFB produced during 2019 was 13,92 kg / ton FFB in PRYE, 22,62 kg / ton FFB in BRYE and 72,99 kg / ton FFB in BLRE.

7.4.4

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Status:

7.5

Practices minimise and control erosion and degradation of soils.

7.5.1

The company has shown the marginal area map as stated in the marginal area map of PT. ASM with a scale of 1; 85,000. The map explains the types of marginal land found in the area of PT. ASM as the table below

Estate	Marginal Area (Ha)		
	Spodic Sand	Lowland Non Mineral Soil	Lowland Mineral Soil
PRYE	202	-	2467
BRYE	1338	429	854
BLRE	226	524	1909
PT. ASM	1766	953	5230

According to the Table above, it could be concluded that there were fragile soils within estate operational areas, as shows through the presence of peat soil, mineral acidic sulfate and very sandy soil texture. However information of soil condition in KKPA ASM was included on PYRE areas. Furthermore, there were also presence of marginal soils through peat (developed), mineral lateritic and alluvial. Thus, main limitation of PT ASM operational areas were due to acidic soils, very sandy soil texture and low fertility.

7.5.2

Based on the document area statement, that the oldest planting year in PT. ASM is the 2009 planting year and the youngest planting year is 2012. The BGAAGRKS-SOP-17 company SOP on plant age is 25 years and after that it is rejuvenated. Rejuvenation also explains technical policy explaining that the considerations for rejuvenation are as follows

- Average tons of FFB production per hectare
- Cost per Ha and cost price per kg of FFB
- Difficulties cut power fruit
- Consideration of CPO and PK selling prices on the market
- Availability of capital to carry out rejuvenation
- Location / area of plant blocks that are rejuvenated

Based on interviews with company management, it was found that the company did not replant during the audit activities. From the results of the field visit to BLRE, BRYE and PRYE also not found a very steep area.

7.5.3

At the time of the audit there were no new oil palm plantations, but the company had shown a map of the slope class area of PT. ASM with a scale of 1; 15000 made by GIS Assistant A which shows no very steep areas. As for the assault class at PT. ASM is divided into 5 namely:

Slope class		hectare			
Class	%	PRYE	BRYE	BLRE	PT. ASM
A	0-5	2235	2273	2470	6977
B	5-8	36	32	32	102
C	8-13	6	-	-	6
D	13-10	-	-	-	-
E	>20	-	-	-	-

Based on the results of field visits conducted by auditors to PRYE, BRYE, and BLRE, no new land clearing was found either on peat, marginal or mineral lands.

Status: comply
7.6
Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.
7.6.1

Based on the results of field visits and studies of basic info documents, the area of the statement that planting was carried out in the range of 2009 to 2012 related to this matter the company did not develop new plantations. Related to the map of soil types and topographic surveys it is known that the type of soil in PT. ASMs are Sulfaquepts, Dystrudepts, Plinthudults, Paleudults, Haplosaprists, Haplohumods, Quartzpsamments, and Haplofibrists

7.6.2

The company has SOP related to the management of marginal land as stipulated in volume 3 of SOP-BGAAGRKS-SOP-16 which describes marginal land that is often used in oil palm cultivation, including

- Peatlands
- Tidal land
- Sand field

From interviews with company management it was found that there were no additions or new plantings on marginal land. The area of the statement explains that the oldest planting year is 2009 and the youngest planting year is 2012.

Based on the results of the field visit to the marginal land in block A27 division III PRYE, management has been carried out in accordance with the SOP, namely the existence of discontinuous trenches, the application of empty lengths, and management of ground management vegetation by planting nephrolepis.

7.6.3

Based on interviews with company management, it was found that the company did not carry out new planting activities in their area. This is also reinforced from the results of the field visit conducted by the auditors to PRYE, BRYE, and BLRE, not finding any new land clearing in peat, marginal or mineral lands.

Status: comply
7.7
No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.
7.7.1

Based on the document review of the area of the statement, it is known that there is no new planting on peatlands in progress. And based on the results of interviews with management and the results of field visits found no new planting in peat areas contained in BRYE and BLRE.

Besides that, based on field observations in BLRE, BRYE, and PRYE, no new planting areas were found, either on mineral land, marginal land or peat land.

7.7.2

The company has carried out an inventory of peatlands in accordance with the RSPO peat inventory template and reports have been made to the RSPO as evidenced by an email sent by Devaladevi Sivaceyon (devaladevi@rspo.org) to Marin M (martin.mach@bumitama.com) on 31 October 2019 with email subject: Bumitama RSPO Peat Inventory and has been declared correct.

Based on the map of the distribution of peat PT. ASM and the company's management explanation found that there was a deep peat conservation area in the F57-F60 block covering 29 ha in BLRE, but the company reported it as an area embedded into the RSPO. Based on the results of a field visit to block F60, it is known that the block is in the condition of being planted with oil palm, related to this matter the company has the opportunity to include the area in future inventory reporting. **OFI**

7.7.3

The company has shown that there is a peat area of 887 Ha, and has 4 monitoring points for peat subsidence. There are 2 units in BLRE block G62 and F60, and 2 more units in BRYE in blocks E61 and E64. Based on the results of the document review, the company has shown the results of monitoring subsidies for a year in 2019. For example, monitoring of peat subsidence at the G62 BLRE subsidence pole point in March 2019 peat subsidence decreased by 0.2 cm from the previous month, in June 2019 occurred peat subsidence decreased by 1.5 cm from the previous month.

Based on the results of the field visit to BLYE F60 block and E64 BRYE it was true that monitoring of peat subsidence was found.

7.7.4

The company has a water management and land cover plan. The water management program is contained in 7A's water management progress report. The document explains the areas prone to flooding, types of work, units, plans and realization. An example is arela prone to flooding with a height of 20-50 cm of water with a period of 4-5 days submerged in BRYE covering an area of 122 ha. One type of work carried out is to create / consolidate embankments with a 1000 meter plan and the realization of 1075 meters (108% achievement)

For land cover, the company has a *Nephrolepis bisserata* soft fern planting program for the 2019 period in which it explains the name of the block, type of land, area of planting plan, realization. An example is the *Nephrolepis bisserata* planter in block B27a division IV PRYE, a Sulfaquepts soil type with an 8 hectare planting plot and a realization of 11 hectares.

7.7.5

Based on interviews with management, the company has not conducted a drainage study for the planted peatlands because the company is still guided by the RSPO drainability assessment which states that the study was conducted at least five years before replanting or fifteen years after the first planting. Based on the study of the company statement area, it is known that the oldest planting year in the plant was in 2009 so that the oldest plant age is still eleven years old.

7.7.6

Water Level Monitoring

Based on the results of the document review, the company can show monthly water level monitoring data for the 2019 period. The company has 4 piezometer units to cover an area of 887 peatlands. Each piezometer represents an area of 221.75 hectares. Based on the RSPO Peat Audit Guidance (P&C 2018), it was explained that 1 unit of piezometer must be available to represent an area of 120 ha. **It is become as Non conformity No. 2020.11 with Critical category.**

Fire Prevention and Control

The company has shown documents related to the peatland fire prevention and control plan. The program plan is as follows:

1. Make a water divider to maintain adequate water in the peat area
2. Make a monitoring control piezometer in the peat area to determine peat subsidence
3. Making water supply (water management)

Besides that, the company has also shown the minutes of emergency response socialization on January 23, 2020 at PRYE which was followed by HSE Assistant, Manager and all members of the PRYE emergency response

7.7.7

The company has monitored HCV areas or peat areas bordering oil palm plantations by installing HCV area signs, maintaining water level elevations outside the plantation area at all times, installing signs of fire-prone areas, and installing water level monitoring stakes in the water level at outlet area. Based on the results of the field visit at the D17 and D18 PRYE block floodgate, water level gauges inside and outside the outlet ditch were found.

7.7.6	Status: Non conformity No. 2020.11 with Critical category.
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7.8

Practices maintain the quality and availability of surface and groundwater

7.8.1.

Water sources identification and management plan are listed on HCV Identification Report. These document describe the water source identification, Mill water usage monitoring & efficiency, and catchment area protections. Field visits on block D38A and block C50B at BRYE for examples, found that companies managed Bengkuang River riparian by marked the buffer zone (throughout 50 m bothsides on riparian), perform revegetation with bamboo, and signboard placement. Company also conducted regularly water quality testing every semester for Bengkuang and Membuluh river. Based on workers interview on BRYE, PRYE, and BLRE estate housing shown that drinking water for them originated from refill water and PRYM also provides clean water access for workers.

Based on EIA management and monitoring realization on first semester of 2019 sighted that the company has conducted water quality testing for well in the PRYE with parameter of Pb: <0.0014 mg/l, pH: 6.23 and CaCO₃: 33.0 mg/l. In addition there are also surface water quality test result in Bengkuang River with parameter of BOD: 2.75 mg/l; COD: 20.1 mg/l; and NO₃-N: 6.57 mg/l. All the parameter were complied with national regulations.

7.8.2.

Company has identified and shown the maps for catchment areas (including riparian) with 1:40000 scale. This map shown there is river stream on estate i.e Bengkuang river, meanwhile Membuluh river are located outside company operational areas. Company provided procedures for these riparian and catchment areas protection listed on procedures BGA-SOP-ASM-RO-52 document. Based on field observation to Bengkuang River riparian on block C46 (BRYE) acquired information that company shown proper ways to maintain and protect the catchment area for example manual weeding and marking the chemical boundary border.

7.8.3.

Mill effluent produced by PRYM processed at Effluent Treatment Plant based on procedure BGAAGRS-SOP-15, the CH has land applications license in accordance to Decree of Ketapang Regent No 660/1290/Perkim LH-E/2017. Waste water quality testing document review shown for periods January to March 2019, all of waste water testing parameters is compliant to the standards quality for examples BOD on March 2019 is 1,442 mg/l. The soil test was conducted every year, the latest on 15 October 2019. The CH also has reported waste water management and monitoring to the related agency per 3 month regularly. The certification unit to be considers to evaluate the quarterly reporting format for effluent treatment plant, referring to Environment Minister Decree No 29 year of 2003. For example: informing result of daily measurement of pH effluent, as well as annual soil test results (OFI).

7.8.4.

The budget of water usage per FFB processing year of 2019 is 1.3 m3/ton FFB. The CH been monitor water usage every month. For example on December 2019 there are water usage: 18,230 m³ and FFB processing: 26,136 ton. The water usage ratio is 0.70 m3/ton FFB, in addition that based on field observation to the Water Treatment Plant Station in PRYM sighted that the flow meter of water usage on good condition.

Status:	
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7.9

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

7.9.1.

Based on document verification sighted that:

1. Diesel and fiber usage for fuel in PRYM period of January to December 2019, for example: diesel usage on December 2019 is 18,230 liter. Whereas fiber usage on December 2019 is 3,138 MT.
2. CPO production date from January to December 2019 is 66,373.51 MT.

However, the unit of certification unit has not been able to shown efficiency of fossil fuel utilization plan and implementation monitoring to reduce the fossil fuel usage and optimize the use of renewable energy. It is become as **non conformity No. 2020.12 with Non Critical category.**

7.9.1	Status: Non conformity No. 2020.12 with Non Critical category	
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7.10

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

7.10.1.

The unit of certification showing GHG emission inventory by RSPO Palm GHG Calculator version 4.0. However there are several variance data as follows:

Estate	FFB production on RSPO GHG Calculator (ton)	Actual FFB production data (ton)
Bengkuang Raya	15,006.27	15,005.16
Belaban Raya	7,253.45	6,682.55
Pembangunan Raya	50,105.66	28,646.36

Koperasi Agro Seriam Mandiri	7,472.01	21,458.30
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In addition, there are also different information of Area Agro Seriam Mandiri Cooperative and Pembangunan Raya Estate. The GHG emission inventory has not been in accordance to actual conditions, so the GHG emissions mitigation plan is not appropriate. **It is become as Non conformity No 2020.13 with Critical category.**

7.10.2
Based on area statement verification, field observation to the estates and interview with managements. It is known that there is no new development area on this audit scope.

7.10.3
Company shown proper management ways for Ex chemical containers, medical waste, and other hazardous / non hazardous waste disposal, based on procedures ASN-SUST-SOP-52 on 2017 and based on waste management plan 2018. Inventory for all ex chemicals usage and it containers are available on PRYM temporary hazardous waste storage. Regarding hazardous waste storage, PRYM have temporary hazardous waste storage permit based on Ketapang Regent decree No 1491/DPMPTSP-D.B/2017 valid until 2022.

7.10.1	Status: Non conformity No 2020.13 with Critical category	
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7.11
Fire is not used for preparing land and is prevented in the managed area.

7.11.1; 7.11.2; 7.11.3.
Based on area statement verification, field observation to the estates and interview with managements. It is known that there is no new development area on this audit scope. However the certification unit has fire fighting team to conducting regular fire patrol and fire fighting simulation. Therefore the certification unit also has engages with adjacent village on prevention and control fire by forming *Masyarakat Peduli Api/Manggala Agni* (a fire caring society).

	Status:	
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7.12
Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.

7.12.1; 7.12.8
Document review found that company are perform land clearing after November 2005 without preceded HCV assessment. Regarding this, company shown LUCA, that covered 5,630 ha areas on 2016. Meanwhile audit scope for this ST-2 assessment are ± 7,085.49 Ha, therefore there is ± 1,455.49 Ha areas were not included on current LUCA.
During this assessment the certification unit showing evidence:

- Email dated 11/14/2019 11:30 from Khing Su Li khing.suli@rspo.org stating the RAC-Plan of Bumitama Agri Ltd are still on review.
- RSPO response dated 23/09/2019 15:20 aimy.nadijah@rspo.org regarding RAC-Plan Bumitama Agri Ltd status, which states the company can continue the certification process.

It will be verification on the next surveillance.

7.12.2.
PT. Agro Sejahtera Manunggal has conducted HCV assessment for the entire area of operations on 2011 by RSPO approved ALS assessor. The process of HCV identification conducted by using HCV identification guides in Indonesia on June 2008. This HCV identification indicates there is HCV 1.1, 1.2, 1.3 1.,4, HCV 4.1, and HCV 6 presence on PT ASM, covered for 102,64 ha areas. All of HCV attributes presence on company was mapped on 1:40000 scale, and this HCV identifications covered all estates/mill operational areas including surrounding landscape and RTE species. Based on area statement verification, field observation to the estates and interview with managements. It is known that there is no new development area on this audit scope.

7.12.3.

Based on area statement verification, field observation to the estates and interview with managements. It is known that there is no new development area on this audit scope.

7.12.4.

The unit of certification have established HCV management plan for periods 2019-2020, and implemented it well. Regularly patrols record shown company has monitored illegal hunting, forest fires, species presence, and other illegal activities. Records for regular patrols (every 2 months) on each estate are available and verified by auditors. For example patrols summary results on December 2019 for PRYE, Block B14, B16 found good signboard and there is no wild species trap. The result of monitoring also reported to government institution every six month by regular environmental management implementation report. Based on field observation to the rehabilitation area in block C45, Division 2 sighted that there are several trees on damage conditions. The Unit of Certification to be consider to evaluate the HCV management and monitoring area involving all relevant stakeholders with the wider landscape level to prevent damage of HCV area by other parties. (OFI)

7.12.5.

Based on document verification found there is HCV 6 presence (sacred spot) on KKPA Agro Seriam Mandiri. Interview with Seriam Village public figure obtained information there is no HCV areas overlapped with local community right. All HCV areas including this HCV 6 areas are located on PT Agro Sejahtera Manunggal land use title right (HGU) areas.

7.12.6.

HCV identification results also explain there is an critically endangered (CR) and endangered (EN) species according IUCN-Redlist V3.1 for examples *Shorea balangeran* (CR), *Manis javanica* (CR), and *Nasalis larvatus* (CR). To provide protection against such RTE species, management unit has made the hunting ban signboard, regular species monitoring and patrols, rehabilitation of riparian as habitat and report to relevant agencies ("Balai Konservasi Sumberdaya Alam").

Based on field visit on Belaban Raya Estate, block F58 (HCV4: deep peat area) shown that the area has planted trees and covered by nephrolepis. Interview with workers (harvester, manuring team, and manual upkeep) on BRYE also found that workers are recognized HCV area as a protected area and they also recognized no chemical applications policy on conservation areas. Workers also have deep understanding related to protected species, for examples hunting ban for protected species.

7.12.7.

The company showed internal office memo No. 002 / ASM-SUST / 05/2018 dated May 31 2018 from Area Controller 7a to all PT ASM managers regarding the commitment of PT ASM HCV management whose one point (point number 7) explained that routine patrol would be carried out every month monitor include:

1. Destruction of HCV areas so that they affect the existing ecosystem
2. Environmental pollution that has an impact on existing flora or fauna
3. Identification of animals found during patrol

Based on monitoring result sighted that the HCV on good condition, there is no HCV damage, no fire occurred and others. The management unit made a monitoring plan for nex year same with previous plan.

Status: Comply

3.2 Conformity Checklist of Certificate and Trademark Use

1.	Evidence of permission or approval certificate and logo from Certification Body which submitted by Client	X or √
ASA-1	PT Agro Sejahtera Manunggal-Subsidiaries of Bumitama Agri Limited do not use RSPO trademark and CB Logo. However th Bumitama Agri Limited has licensees with number 1-0043-07-100-00.	√
	Status: Comply	
2.	Implementation of certificate and logo used by Client comply with size and type (shape) against Guideline of Logo Use	X or √
ASA-1	PT Agro Sejahtera Manunggal-Subsidiaries of Bumitama Agri Limited do not use RSPO trademark and CB Logo. However th Bumitama Agri Limited has licensees with number 1-0043-07-100-00.	√
	Status: Comply	
3.	Implementation of Certificate and Logo is not used on product	X or √
ASA-1	PT Agro Sejahtera Manunggal-Subsidiaries of Bumitama Agri Limited do not use RSPO trademark and CB Logo. However th Bumitama Agri Limited has licensees with number 1-0043-07-100-00.	√
	Status: Comply	
4.	Controlling of Certificate and Logo, including withdrawing inappropriate logo.	X or √
ASA-1	PT Agro Sejahtera Manunggal-Subsidiaries of Bumitama Agri Limited do not use RSPO trademark and CB Logo. However th Bumitama Agri Limited has licensees with number 1-0043-07-100-00.	√
	Status: Comply	

3.3 Summary of RSPO Partial Certification.

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

Bumitama Agri, Ltd Time Bound Plan is explained in table 1.10. Bumitama Agri, Ltd has informed the Time Bound Plan progress, MUTU has considered that MP Bumitama Agri, Ltd is complied with the RSPO requirement for Time Bound Plan. The Time Bound Plan was revised and declared by Bumitama Agri, Ltd on February, 26 2019.

MUTU has verified partial certification for un-certified unit's subsidiary of Bumitama Agri, Ltd based on their Time Bound Plan. There are nine (9) uncertified mills and thirty two (32) uncertified estates management units of Bumitama Agri, Ltd. MUTU Auditor verified positive assurance against the company internal audit and supporting evidence as well as any information from others sources.

MUTU Auditor has verified company partial certification and concludes that:

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

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	Based on the document review, there is a company internal audit that was conducted on 2018 and the positive assurance is at this table that is also been verified.
2.1.2	No replacement of primary forest or any area identified as containing High Conservation Values (HCVs) or required to maintain or enhance HCVs in accordance with RSPO criterion 7.3 (it has changed be Criterion 7.12 in P&C 2018)	<p>PT Langgeng Muara Makmur Sejahtera</p> <ul style="list-style-type: none"> - RaCP Plan document are wait for LUCA documents to be submitted and approved by RSPO. - HCV conducted March 2012 by Forestry IPB. <p>PT Andalan Sukses Makmur</p> <ul style="list-style-type: none"> - LUCA was sent on January 2015 to RSPO - Documents RaCP Plan are wait for LUCA approved by RSPO - HCV was conducted on October 2013 by Sonokeling Akreditasi Nusantara <p>PT Investa Karya Bhakti</p> <ul style="list-style-type: none"> - LUCA was sent on 13 June 2016 to RSPO - Documents RaCP Plan are wait for LUCA approved by RSPO <p>PT Gunajaya Harapan Lestari</p>

	<ul style="list-style-type: none"> - LUCA has not been submitted to RSPO - HCV was conducted on October 2012 by Forestry IPB <p>PT Windu Nabatindo Sejahtera</p> <ul style="list-style-type: none"> - LUCA was sent on 19 June 2016 to RSPO - Documents RaCP Plan are wait for LUCA approved by RSPO - HCV was conducted on March 2012 by Forestry IPB <p>PT Ladang Sawit Mas</p> <ul style="list-style-type: none"> - LUCA was sent on 16 July 2014 to RSPO - Documents RaCP Plan are wait for LUCA approved by RSPO - HCV was conducted on December 2013 by Sonokeling Akreditasi Nusantara <p>PT Lestari Gemilang Intisawit</p> <ul style="list-style-type: none"> - LUCA was sent on 7 November 2014 to RSPO - Documents RaCP Plan are wait for LUCA approved by RSPO - HCV was conducted on 2013 by Sonokeling Akreditasi Nusantara <p>PT Agro Manunggal Sawitindo</p> <ul style="list-style-type: none"> - LUCA was sent on 7 November 2014 to RSPO - Documents RaCP Plan are wait for LUCA approved by RSPO - HCV was conducted on July 2013 by Sonokeling Akreditasi Nusantara <p>PT Karya Makmur Langgeng</p> <ul style="list-style-type: none"> - LUCA was sent on January 2015 to RSPO - Documents RaCP Plan are wait for LUCA approved by RSPO - HCV was conducted on July 2013 by Sonokeling Akreditasi Nusantara <p>PT Gemilang Makmur Subur</p> <ul style="list-style-type: none"> - HCV was conducted on November 2016 by PT Gagas Dinamika Aksenta. <p>Auditor verification</p> <p>Based on internal audit results and evidence provided (communication to RSPO on liability disclosure) shows that all subsidiaries of</p>
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		Bumitama has been sent to RSPO and now on progress of LUCA review.
2.1.3	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>PT Langgeng Muara Makmur Sejahtera, there is no new planting after January 1st 2010.</p> <p>PT Andalan Sukses Makmur, NPP was completed for areal 5,630 Ha and publish on March 10th 2016.</p> <p>PT Investa Karya Bhakti, NPP was completed for areal 5,700 Ha and publish on October 4th 2016.</p> <p>PT Gunajaya Harapan Lestari, there is no new planting after January 1st 2010.</p> <p>PT Windu Nabatindo Sejahtera, there is no new planting after January 1st 2010.</p> <p><i>Auditor verification</i> Based on internal audit, documented time of land clearing and liability disclosure sent to RSPO, there is new planting/land clearing after 1st January 2010 for PT Andalan Sukses Makmur and PT Investa Karya Bhakti but NPP has been conducted for these units. Evidence of submission to RSPO is provided and the NPP notification are at RSPO website.</p>
2.1.4	Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO criteria 2.2, 6.4, 7.5 and 7.6 (it has changed be Criterion 4.8, 4.7 and 4.5 in P&C 2018).	<p>There is no land conflicts.</p> <p><i>Auditor verification</i> There is land conflicts and has been resolved with RSPO Grievance procedure or Dispute Settlement Facility.</p>
2.1.5	Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3 (it has changed be Criterion 4.2 in P&C 2018).	<p>There is labor disputes. There is no information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries.</p> <p><i>Auditor verification</i> There is labour dispute in uncertified unit i.e PT Bumitama Gunajaya Abadi. The dispute has been resolved as we can seen in RSPO website</p>

		that the status of dispute in closed for monitoring.
2.1.6	Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1 (it has changed be Criterion 4.2 in P&C 2018).	<p>PT Langgeng Muara Makmur Sejahtera</p> <ul style="list-style-type: none"> Izin Prinsip Arahan Lokasi No. 525.21/660/Ek.SDA/IX/2014 dated 12 September 2014 5,325 Ha Location Permit SK District Kotawaringin Timur No. 188.45/330/Huk-BPN/2014, 23 September 2014 5,370 Ha Environment Permit No. 660/2140/BLH-Ek.SDA/2015, 19 October 2015 for 5,325 Ha IUP No. 188.45/490/Huk-Ek.SDA/2014, 19 December 2014 4,810.72 Ha SK HGU No. 5/HGU/KEM-ATR/BPN/2017, January 10th 2017. <p>PT Andalan Sukses Makmur</p> <ul style="list-style-type: none"> Izin Prinsip Arahan Lokasi SK District Kotawaringin Barat No.590/105/Pem-XI/2012, November 21 2012 for areal 9,000 Ha. Location Permit SK District Kotawaringin Barat No.525/68/XII/2012, December 18th 2012 for 9,275 Ha IUP No. 525/45/ek, 06 February 2013 HGU on process. <p>PT Investa Karya Bhakti</p> <ul style="list-style-type: none"> Izin Prinsip Arahan Lokasi No. 590/09.Pem-II/2014, 3rd February 2014 for areal 14,500 Ha. Location Permit SK District Kotawaringin Barat No. 525/62/IX/2014, 1st September 2014, 11,746.74 Ha IUP No. 525/014/EK, April 21 2015, 5,700 Ha <p>PT RohulSawitIndustri and PT Masuba Citra Mandiri</p> <ul style="list-style-type: none"> HGU on process Panitia B Inti No. 03/RSL/HGU/2015 seluas 1,893.11 Ha Panitia B Plasma No. 04/RSL/HGU/2015 seluas 938,16 Ha <p>PT Gunajaya Harapan Lestari</p> <ul style="list-style-type: none"> Izin Prinsip Arahan Lokasi No. 525/426/Bappeda-D year of 2007, 08 May 2007 for areal 3,000 Ha.

	<ul style="list-style-type: none"> • Location Permit SK District Kendawangan No. 265 year of 2007, 28 June 2007 for 3,000 Ha • Revision Location Permit No. 370 year of 2008, 07 October 2008 for 3,000 Ha • Extension Location Permit No. 415 year of 2010, 27 July 2010 for 3,000 Ha • IUP No. 365/DISBUN-D/2012, August 23rd 2012 for 1,750 Ha • HGU No. 62/HGU/KEM-ATR/BPN/2016, 1,973.45 Ha <p>PT Windu Nabatindo Sejahtera</p> <ul style="list-style-type: none"> • Izin Prinsip Arahkan Lokasi No. 02.04.28/525.26/463/XI/EkBang/03, 8th November 2003 for areal 7,000 Ha. • Location Permit SK District Kotawaringin Timur No. 165.460.42, 26 February 2004 for 5,370 Ha • IUP No. 525.26/152/V/EkBang/2004, 17 May 2004 for 5,370 Ha • Permit Location No. 374.460.42, December 13 2006 for 5,000 Ha (Revision) • IUP No. 525.26/386/V/EkBang/2007, May 30th 2007 for areal 5,000 Ha (Revision) • Kadastral Map No. 355-15.05-2007, July 6th 2007 for areal 4,998.76 Ha • Surat Permohonan HGU 003/WNS-Dir/VII/2007, July 11th 2007 for areal 5,000 Ha. <p>PT Windu Nabatindo Abadi</p> <ul style="list-style-type: none"> • Sertifikat HGU No. 37/HGU/BPN RI/2014 seluas 1,987.8 Ha • Sertifikat HGU No. 48/HGU/KEM-ATR/BPN/2015 tanggal 20 Mei 2015 seluas 5.773 Ha <p>PT Nabatindo Karya Utama</p> <ul style="list-style-type: none"> • Sertifikat HGU No. 17/HGU/KEM-ATR/BPN/2016 tanggal 07 April 2016 seluas 3,298.63 Ha <p>HGU on process for Ladang Sawit Mas, PT Lestari Gemilang Intisawit, PT Agro Manunggal Sawitindo, PT Karya Makmur Langgeng, and PT Gemilang Makmur Subur</p> <p><i>Auditor verification</i></p>
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		Land legal process is still going on and there is a detail update progress documented by the company for each year.
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3.4 Identification of Findings, Corrective Action, Observations, Opportunity for Improvement and Noteworthy Positive Components.

3.4.1. Identification of Findings, Corrective Actions and Observations at Initial Certification

<i>NCR No.</i>	: 2018.01	<i>Issued by</i>	: M. Amarullah
<i>Date Issued</i>	: 07 September 2018	<i>Time Limit</i>	: ASA1
<i>NC Grade</i>	: Minor	<i>Date of Closing</i>	: 9 October 2018
<i>Standard Ref. & Requirement</i>	2.1.2 A documented system, which includes written information on legal requirements, shall be maintained.		
Evidence observed (filled by auditor): Information about law or regulations listed in the Law Register document, but there are some law or regulation that have not been listed in the law registers, such as: <ul style="list-style-type: none">• Governor of West Kalimantan Decree No. 706 / 2017 related to the Minimum Wage of the Ketapang Regency of West Kalimantan.• Ministry of Manpower Regulation No. 5 / 2018 related to Occupational Safety and Health• Ministry of Environment Regulation No. 45 / 2005 related to RKL / RPL reports• Ministry of Environment Regulation No. 20 / 2018 related to protected plants and wildlife species• Ministry of Agrarian and Spatial Planning Regulation / Head of National Land Agency Number 7 / 2017 related to arrangement and procedures for the determination of the HGU• Ministry of Agriculture No. 5 / 2018 related to land clearing without burning• Government Regulation No. 71 / 2014 related to the protection and management of peat			
Non-Conformance Description (filled by auditor): PT ASM cannot show the evidence if all regulations that mandatory has been listed in in the Law Register			
Root Cause Analysis (filled by organization audited): Ineffective document control from Sustainability Region on the application of SOP for Identification & Evaluation of Regulations			
Correction Action (filled by organization audited): Updated Law Registry based on the identification of new regulations that are relevant to the company (if any).			
Corrective Action (filled by organization audited): 1. Review of documents in accordance with the SOP for Regulation Identification & Evaluation. 2. Implementation of Internal Audit & Management Review			
Assessor Evaluation and Conclusion (filled by auditor) : Auditor Verification 9 October 2018 The company can show corrective evidence in the form of a list of laws and regulations in the field of OHS, Plantation and Environment. The list of regulations has been revised on September 24, 2018. Regulations updated include: Environmental aspect - Regulation of the Minister of Environment No. 45 of 2005 concerning the RKL / RPL report			

<ul style="list-style-type: none">- Regulation of the Minister of Environment No. 05 of 2014 concerning Waste Water Quality Standards	
Safety aspect:	
<ul style="list-style-type: none">- Decree of the Governor of West Kalimantan No. 706 / Disnakaertrans / 2017 concerning the Minimum Wage of Ketapang Regency, West Kalimantan.	
Plantation and spatial aspect	
<ul style="list-style-type: none">- Minister of Agrarian and Spatial Planning / Head of the National Land Agency Number 7 of 2017 concerning the regulation and procedures for establishing business use rights- Government regulation No 71 of 2014 concerning the protection and management of peat ecosystems	
Based on Root Cause Analysis, Correction, Corrective Action and corrective evidence that addressed, the non conformity on this indicator Stated Closed	
Verified by	: Moh Arif Yusni

<i>NCR No.</i>	: 2018.02	<i>Issued by</i>	: Moh Arif Yusni
<i>Date Issued</i>	: 07 September 2018	<i>Time Limit</i>	: ASA-1
<i>NC Grade</i>	: Minor	<i>Date of Closing</i>	: 12 October 2018
<i>Standard Ref. & Requirement</i>	2.2.2 Legal boundaries are demonstrated clearly and maintained.		
Evidence observed (filled by auditor): Based on the verification results of the PT Agro Sejahtera Manunggal document, it has identified the land demarcation boundary (HGU poles) which explains the location of the poles, coordinates and the location map of the poles. Based on the results of the identification, it is known that there are 122 poles in the land title area. The results of monitoring in June 2018 revealed that there were 6 HGU poles that could not be installed due to their location on the river border. Based on the results of the field visit, it was discovered that there were several stakes whose location did not match the coordinates that had been set, for example: <div><div>1.</div><div>Bengkuang Raya Estate HGU poles no ASM A61 Block D39; ASM 60 Block 40 B, the poles is ± 50 meters from the specified coordinates</div></div> <div><div>2.</div><div>Construction of Raya Estate HGU poles no ASM59 Block A03 is ± 37 meters from the specified coordinates</div></div> Related to this matter, the company has not been able to show proof that the boundary mark has been installed in accordance with the coordinates that have been set Non-Conformance Description (filled by auditor): PT ASM has not been able to show proof that the boundary mark has been installed in accordance with the coordinates that have been set Root Cause Analysis (filled by organization audited): The lack of understanding for PIC maintenance of pole boundaries is related to the installation of stakes that match the coordinates of the land title map. Correction (filled by organization audited): <div><div>1.</div><div>Reviewing the entire stone boundaries that are installed with the coordinate points printed on the land title map</div></div>			

2. Reassignment of the stone boundaries that do not match the location of land title map and the installation of the boundaries pole for the river border area.	
Corrective Action (filled by organization audited): Maintenance of all boundaries pole according to the Program that coordinated by the Assistant GIS Region.	
Assessor Evaluation and Conclusion (filled by auditor): Auditor Verification 12 October 2018 The company submits corrective evidence in the form of: <ol style="list-style-type: none"> 1. Program for Installation and Maintenance of polled boundaries in 2018 which includes the inventory of stakes in accordance with maps of the BPN, repairs of lost and damaged stakes, maintenance programs and polishing instaling boundaries 2. Minutes of observation, Replacement and adjustment of position of boundaries stakes for example on September 27, 2018 in Bengkuang Raya Estate where from 36 stakes it is known that 24 stakes are suitable, 11 stakes are not suitable and 1 stakes are not installed (in river banks) 3. Observation report, Replacement and adjustment of boundaries stake position for example on September 28, 2018 in Belaban Raya Estate where 34 polls are known that 16 stakes are suitable, 10 Stakes are not appropriate, 5 poles are installed (in river banks) and missing 3 polish 4. Minutes of observation, replacement and adjustment of boundaries stakes position for example on September 28, 2018 at Pembangunan Raya Estate where from 52 stakes it was known that 34 stakes were suitable, 11 stakes was not suitable and 7 stakes were missing <p>Based on Root Cause Analysis, Correction, Corrective Action and corrective evidence that addressed, the non conformity on this indicator Stated Closed</p>	
Verified by	: Moh Arif Yusni

<i>NCR No.</i>	: 2018.03	<i>Issued by</i>	: Mohamad Amarullah
<i>Date Issued</i>	: 07 September 2018	<i>Time Limit</i>	: ASA-1
<i>NC Grade</i>	: Minor	<i>Date of Closing</i>	: 13 November 2018
<i>Standard Ref. & Requirement</i>	4.1.3 Records of monitoring and any follow-up actions shall be available.		
Evidence observed (filled by auditor): Based on document review and field observation, it was known that there were area for about ±1,427.11 ha which not included on the scope of certification (non-certified), but still managed under PT Agro Sejahtera Manunggal management. Those area were divided into ±299.50 ha in Belaban Raya Estate, ±604.98 ha in Bengkuang Raya Estate, ±522.63 ha in Pembangunan Raya Estate and ±40.47 ha in KUD Agri Seriam Mandiri. Regarding this matters, company management was not be able to shows that any records related to oil palm agronomy and environment management for example fertilizer and pesticide consumption and Green House Gasses calculation, etc. were been separated towards certified and non-certified area.			
Non-Conformance Description (filled by auditor): The company is not be able to shows that mechanism of documentation in accordance with scope of certification (separation for certified and non-certified area) has conducted properly.			

Root Cause Analysis (filled by organization audited):

Lack of understanding of Unit Manager related to the mechanism for documenting the boundary map of the RSPO certificate scope for the HGU area in each Work Unit according to their scope of responsibility and the application of identification of each RSPO certified Estate that is equipped with block numbers and verification of certified FFB in each FFB delivery notes which were accepted by PRYM

Correction (filled by organization audited):

1. Preparation of documentation and identification of boundary procedures in the field for the scope of RSPO certification and non-RSPO certification areas in each Unit: BRYE, BKYE, PRYE, KUD Agro Semesta.
2. Provision of boundary documentation in the field for the scope of RSPO certification and areas that are not RSPO certified in each Unit: BRYE, BKYE, PRYE, KUD Agro Semesta
3. providing evidence of the results of verification of RSPO certified FFB and non-RSPO certified according to the *procedur Identifikasi dan Kemampuan Telusur Produk*.

Corrective Action (filled by organization audited):

1. Implementation of the Product Tracing & Capability Identification procedure (documentation / recording mechanism related to the area in accordance with the scope of the certification described in this procedure).
2. Implementation of Internal Audit and Management Review.

Assessor Evaluation and Conclusion (filled by auditor):

Verification 12 October 2018

The company submits corrective evidence in the form of:

1. Separation mechanism for certified and non-certified FFB (ASM Document No. - SUST-GDN-01), in the mechanism explains related to
 - Marking the boundaries of certified FFB areas with those not certified
 - Verification of mill is related to the source of FFB from the unit (certified or not)
2. Certified and non-certified FFB separation mechanism training report to the PT ASM Estate Administration and Mill which was held on October 5, 2018
3. Internal Office Memo No. 001 / ASM-SUST / X / 2018 dated October 1, 2018 from the Area Controller 7A Regarding the RSPO PT ASM FFB Separation Commitment which explained that to all PT ASM managers to:
 - Conduct an inventory of certified block in PT ASM's HGU.
 - Administration of FFB production administration in certified block starting from RSPO FFB delivery notes (See RSPO Estate Block attachment) to the Mill. The RSPO FFB delivery notes that was accepted due to the weigh of the FFB was then separated & the administration of RSPO FFB registration by the Mill. Estate also recorded the RSPO FFB administration.
4. Training and Monitoring Program for SCCS activities at PT ASM for the 2018/2019 period
5. Data on FFB receipts from each supplier which includes the Farmer / Cooperative Group.
6. List of areas that are certified and not PT ASM certified which explain Blocking, Planting Year and area.

Verification 1 November 2018

Can be shown corrective evidence in the form of an minutes of field activities FFB separation from certificates and non-certificates area in Bengkuang Raya Estate, Belaban Raya Estate and Pembangunan Raya Estate 31 October 2018, where marking is done is by staining oil palm plants and installing auxiliary markers for certification and non-certification area separators

Regarding the corrective evidence that addressed, the auditor considered that there was a need to field observation

Verification, 13 November 2018

Based on the results of a field visit on the Palm oil mill on November 12, 2018 it is known that:

- Can be simulated for FFB receipts from areas included in the scope of certification and out the scope of certification
- Can be simulated calculation of FFB, CPO and PK production from areas including the scope of certification
- list of blocks or areas included in the scope of certification

In addition, based on the results of the sample field visit at the Raya Estate Development Block A12 / A13, Bengkuang Raya Estate Blok B37, C31 and Belaban Raya Estate Blok F67 it is known that

- Marking has been carried out between the areas included in the scope of the certification and beyond the scope of the certification in the form of Paint on the principal of oil palm
- Marking has been done with auxiliary stakes with a distance between stakes \pm 50 meters each
- Can be simulated mechanism of harvesting, collection of FFB and transportation of FFB produced

Based on Root Cause Analysis, Correction, Corrective Action and corrective evidence that addressed, the non conformity on this indicator Stated Closed

Verified by : **Moh Arif Yusni**

<i>NCR No.</i>	: 2018.04	<i>Issued by</i>	: Moh Arif Yusni
<i>Date Issued</i>	: 07 September 2018	<i>Time Limit</i>	: 06 September 2019
<i>NC Grade</i>	: Major	<i>Date of Closing</i>	: 13 November 2018
<i>Standard Ref. & Requirement</i>	4.1.4 Records of the origins of all third-party FFB sourced (collector, deliver, Cooperative, Farmers Association and outgrower) shall be available.		
Evidence observed (filled by auditor): However, based on document review and field observation, it was known that there were area for about ±1,427.11 ha which not included on the scoop of certification (non-certified), but still managed under PT Agro Sejahtera Manunggal management. Those area were divided into ±299.50 ha in Belaban Raya Estate, ±604.98 ha in Bengkuang Raya Estate, ±522.63 ha in Pembangunan Raya Estate and ±40.47 ha in KUD Agri Seriam Mandiri. Regarding this matters, company management was not be able to shows that any records related to oil palm agronomy and environment management for example fertilizer and pesticide consumption and Green House Gasses calculation, etc. were been separated towards certified and non-certified area. Thus, mechanism of documentation for certified and non-certified area is not available			
Non-Conformance Description (filled by auditor): Mechanism of documentation for certified and non-certified area is not available			
Root Cause Analysis (filled by organization audited): Lack of understanding of Unit Manager related to the mechanism for documenting the boundary map of the RSPO certificate scope for the HGU area in each Work Unit according to their scope of responsibility and the application of identification of each RSPO certified Estate that is equipped with block numbers and verification of certified FFB in each FFB delivery notes which were accepted by PRYM			

Correction (filled by organization audited):

1. Preparation of documentation and identification of boundary procedures in the field for the scope of RSPO certification and non-RSPO certification areas in each Unit: BRYE, BKYE, PRYE, KUD Agro Semesta.
2. Provision of boundary documentation in the field for the scope of RSPO certification and areas that are not RSPO certified in each Unit: BRYE, BKYE, PRYE, KUD Agro Semesta
3. providing evidence of the results of verification of RSPO certified FFB and non-RSPO certified according to the *prosedur Identifikasi dan Kemampuan Telusur Produk*.

Corrective Action (filled by organization audited):

1. Implementation of the Product Tracing & Capability Identification procedure (documentation / recording mechanism related to the area in accordance with the scope of the certification described in this procedure).
2. Implementation of Internal Audit and Management Review.

Assessor Evaluation and Conclusion (filled by auditor):
Verification 12 October 2018

The company submits corrective evidence in the form of:

1. Separation mechanism for certified and non-certified FFB (ASM Document No. - SUST-GDN-01), in the mechanism explains related to
 - Marking the boundaries of certified FFB areas with those not certified
 - Verification of mill is related to the source of FFB from the unit (certified or not)
2. Certified and non-certified FFB separation mechanism training report to the PT ASM Estate Administration and Mill which was held on October 5, 2018
3. Internal Office Memo No. 001 / ASM-SUST / X / 2018 dated October 1, 2018 from the Area controller 7A Regarding the RSPO PT ASM FFB Separation Commitment which explained that to all PT ASM managers to:
 - Conduct an inventory of certified blocks in PT ASM's HGU.
 - Administration of FFB production administration in certified blocks starting from RSPO FFB delivery notes (See RSPO Estate Block attachment) to the Mill. The RSPO FFB delivery notes that was accepted due to the weigh of the FFB was then separated & the administration of RSPO FFB registration by the Mill. Estate also recorded the RSPO FFB administration.
4. Training and Monitoring Program for SCCS activities at PT ASM for the 2018/2019 period
5. Data on FFB receipts from each supplier which includes the Farmer / Cooperative Group.
6. List of areas that are certified and not PT ASM certified which explain Blocking, Planting Year and area.

Verification 1 November 2018

Can be shown corrective evidence in the form of an minutes of field activities FFB separation from certificates and non-certificates area in Bengkuang Raya Estate, Belaban Raya Estate and Pembangunan Raya Estate on 31 October 2018, where marking is done is by staining oil palm plants and installing auxiliary markers for certification and non-certification area separators

Regarding the proof of improvement sent by the team, the auditor considered that there was a need to field observation

Verification, 13 November 2018

Based on the results of a field visit on the Palm oil mill on November 12, 2018 it is known that:

- Can be simulated for FFB receipts from areas included in the scope of certification and out the scope of certification

- Can be simulated calculation of FFB, CPO and PK production from areas including the scope of certification
- list of blocks or areas included in the scope of certification

In addition, based on the results of the sample field visit at the Pembangunan Raya Estate Block A12 / A13, Bengkuang Raya Estate Blok B37, C31 and Belaban Raya Estate Blok F67 it is known that

- Marking has been carried out between the areas included in the scope of the certification and beyond the scope of the certification in the form of Paint on the principal of oil palm
- Marking has been done with auxiliary stakes with a distance between stakes \pm 50 meters each
- Can be simulated mechanism of harvesting, collection of FFB and transportation of FFB produced

Based on Root Cause Analysis, Correction, Corrective Action and corrective evidence that addressed, the non conformity on this indicator Stated Closed

Verified by : **Moh Arif Yusni**

NCR No.	: 2018.05	Issued by	: Mohamad Amarullah
Date Issued	: 07 September 2018	Time Limit	: 06 September 2019
NC Grade	: Major	Date of Closing	: 13 November 2018
Grade			
Standard Ref. & Requirement	: 4.3.4 Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place.		
Evidence observed (filled by auditor): Based on soil map of PT ASM dated August 18 th 2015 review, it was known that there were presence of peat area in BRYE and BLRE for about 279.71 ha and 803.25 ha, respectively. Furthermore, based on field observation and document related to peat management verification, it was noted several points as follows: <ul style="list-style-type: none">• Evaluation towards peat subsidence were not available. According to peat subsidence monitoring record in BLRE, it was known that subsidence rate was about 0.66 cm/month or \pm7.92 cm/year.• Evaluation towards water table measurements were not available. According to piezometer monitoring record, it was known that water table from June to July and from July to August were significantly decrease/drop for about 28 cm and 45 cm, respectively.• Monitoring and evaluation on water level measurement were not available.• As observed to Division 2 Block F50 BLRE and Division 3 Block C46 BRYE, it was known that scale on water level measurement stick were not clear (cannot be read).• As observed to flapgate in Division 2 Block F50 BLRE, it was known that the flapgate was not able to maintain water level at 60 to 80 cm.			
Non-Conformance Description (filled by auditor): The company is not be able to shows evidence that peat soil subsidence has been minimized by estate management.			
Root Cause Analysis (filled by organization audited): Lack of control from the Assistant Agronomy & Assistant Research regarding the implementation of monitoring & measuring subsidence of peat land & water levels in the BLRE Unit as a whole.			
Correction (filled by organization audited):			

1. Repair the installation of water level measurements are clearly legible and infrastructure repair & installation flapgate dykes to control the ground water level is between 50-60 cm.
2. Provision of evidence recording the results of monitoring and measurement and evaluation of peat soil subsidence and water level in the areas that have been identified.

Corrective Action (filled by organization audited):

Periodically carry out management reviews for water management & peatland management programs by Unit Manager.

Assessor Evaluation and Conclusion (filled by auditor):
Verification 23 October 2018

The company submits corrective evidence in the form of:

- Installation and manufacture of Subsidence Pole, Piezometer, Water Level and Water Bulkhead in Block E 64 BRYE, along with monitoring
- Installation and manufacture of Subsidence Pole, Piezometer, Water Level and Water Bulkhead in Block G 62 BLRE, along with monitoring

Regarding the corrective evidence that addressed, the NCR in this indicator are not yet closed, the company needs to complete with

- Map of the location of the flapgate / embankment to control the groundwater level between 50 - 60 cm in the operational area of PT ASM
- Map of location of subsidence pole, piezometer and water level in the operational area of PT ASM Program dan realisasi perbaikan tanggul / flapgate di areal operasional PT ASM

Verification 1 November 2018

The company submits corrective evidence in the form of:

- Map of the location of the flapgate / embankment to control the groundwater level between 50 - 60 cm in the operational area of PT ASM
- Map of location of subsidence pole, piezometer and water level in the operational area of PT ASM Program dan realisasi perbaikan tanggul / flapgate di areal operasional PT ASM
- Program and the realization of improvement embankment / flap gate / water gate in the PT ASM operational area for 218 years

Based on Root Cause Analysis, Correction, Corrective Action and corrective evidence that addressed, the non conformity on this indicator Stated Closed

Verified by	: Moh Arif Yusni
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<i>NCR No.</i>	: 2018.06	<i>Issued by</i>	: Steve Mualim
<i>Date Issued</i>	: 7 September 2018	<i>Time Limit</i>	: 06 September 2019
<i>NC Grade</i>	: Major	<i>Date of Closing</i>	: 26 October 2018
<i>Standard Ref. & Requirement</i>	: 4.6.6 Storage of pesticides shall be according to recognised best practices. All		

	pesticides containers shall be properly managed according to the existing regulations and or instructions enclosed on the containers
<p><i>Non-Conformance Description & Evidence observed (filled by auditor):</i> Meanwhile field visit on BLRE housing found that one of those housing are being used as pesticides store. Procedure ASM-SUST-SOP-14 on 2015 are clearly states that all chemical store must be located far away from workers housing.</p> <p>Regardig this, company are not able to shown proper ways for pesticides storage based on current procedures.</p> <p>Non-Conformance Description (filled by auditor): company are not able to shown proper ways for pesticides storage based on current procedure</p>	
<p>Root Cause Analysis (filled by organization audited): Lack of understanding of the Unit in managing chemicals in accordance with the Chemical Management Procedure.</p>	
<p>Correction (filled by organization audited):</p> <ol style="list-style-type: none"> 1. Provision Warehouses Chemicals decent. 2. Transfer, storage & handling of chemicals in the new Chemical Warehouse according to the Chemical Management Procedure. 3. Socialization SOP Management of Chemicals by HSE Officer to all employees involved. 	
<p>Corrective Action (filled by organization audited): HSE Inspection by HSE Officer regularly.</p>	
<p>Assessor Evaluation and Conclusion (filled by auditor): Verification, 26 October 2018 The company submits corrective evidence in the form of:</p> <ul style="list-style-type: none"> - Documentation of building a Pesticide Warehouse in Belaban Raya Estate which is separate from housing. The warehouse has been equipped with supporting infrastructure facilities such as MSDS, Pallets, and First Aid Box - Minutes of transfer of pesticide material from G6 Building Warehouse to the new Pesticide Warehouse on October 25, 2018 - socialization of SOP for Pesticide Management at Belaban Raya Estate on October 25, 2018 with a total of 28 participants, consisting of Spray Officers, Assistant and Warehouse Officers <p>Based on Root Cause Analysis, Correction, Corrective Action and corrective evidence that addressed, the non conformity on this indicator Stated Closed</p>	
Verified by	: Moh Arif Yusni

NCR No.	: 2018.07	Issued by	: M. Amarullah
Date Issued	: 7 September 2018	Time Limit	: 06 September 2019
NC Grade	: Major	Date of Closing	: 15 October 2018
Grade			

Standard Ref. & Requirement	: 4.6.11 Annual medical records of pesticide operators, and follow-up treatment of medical results, shall be available
Evidence observed (filled by auditor): Based on the results of interviews with pesticide applicators in all estates, it was known that the company had carried out special health checks two (2) times a year and interviews with paramedic officers obtained information carried out in March 2018. Related to this evidence of implementation of health inspection activities and follow-up to the results of the health examination cannot yet be shown.	
Non-Conformance Description (filled by auditor): Not yet shown evidence of medical check-up realization and evaluation document.	
Root Cause Analysis (filled by organization audited): The lack of effective control of recordings related to the results of employee health checks in each estate/mill. MCU recording controls that are ineffective at PT. ASM as a whole due to the following: <ol style="list-style-type: none"> 1. Doctors who have carried out MCU for most employees one (1) month prior to the RSPO stage-2 audit of PT. ASM is transferred from the West Kalimantan region to the Central Kalimantan region. 2. The MCU data is filed by the Medical Staff and 2 weeks before the RSPO audit is taking place, the Medical Officer resigns and hand over the work to the new Medical Officers (who still new and lack of communication). 3. Responding to MCU recording control of PT. ASM, a management review was carried out on September 7, 2018 and was decided by the Regional Head & Area Controller as follows: <ol style="list-style-type: none"> a) Re-conducted MCU which was coordinated by Doctor Donny (new medical staff). b) MCU copies of employees controlled by Sustainability Staff who act as RSPO & ISPO Document Control PT. ASM. c) Explanation of the importance of controlling the recording of this MCU to the new Medical Persons by Mr. Diar and also to the participants of this ASM management review meeting. <p>Note: RSPO & ISPO PT ASM Management review meeting on point No. 3 take place after RSPO & ISPO closing meeting which has been done by auditors of PT Mutuagung Lestari on 7 September 2018.</p>	
Correction (filled by organization audited): Related Estate Manager coordination with company doctor for provision the document of MCU and its evaluation based on doctor recommendation.	
Corrective Action (filled by organization audited): Implementation of Audit Internal & Management Review.	
Assessor Evaluation and Conclusion (filled by auditor): Verification 12 October 2018 Company has shown: <ul style="list-style-type: none"> - Medical Check Up document for all workers which has been done on 28 September 2018, where check up covers cholinesterase, Audiometry and Spirometry. - MCU Document Control Decree. 	

Based on these explanations, Nonconformity has not been fulfilled, PT ASM needs to clarify with regard to the root of the problem regarding to further clarification regarding "lack of effective recording control". Is it due to PICs that do not yet understand, or control systems (SOPs) that have not been effective.

Verification 15 October 2018

Based on clarification evidence which has been done by management, accordingly the Non-conformity has been fulfilled.

Verified by : **Moh Arif Yusni**

<i>NCR No.</i>	: 2018.08	<i>Issued by</i>	: M. Amarullah
<i>Date Issued</i>	: 7 September 2018	<i>Time Limit</i>	: 06 September 2019
<i>NC Grade</i> Grade	: Major	<i>Date of Closing</i>	: 15 October 2018
<i>Standard Ref. & Requirement</i>	: 4.7.1 A health and safety policy shall be in place. A health and safety plan shall be documented and implemented, and its effectiveness monitored.		

Evidence observed (filled by auditor):

based on the results of interviews with workers in POM, it was known that the company had carried out special health checks two (2) times a year and interviews with paramedic officers obtained information carried out in March 2018. Related to this evidence of implementation of health inspection activities and follow-up to the results of the health examination cannot yet be shown.

Non-Conformance Description (filled by auditor):

Not yet shown evidence of medical check-up realization and evaluation document.

Root Cause Analysis (filled by organization audited):

The lack of effective control of recordings related to the results of employee health checks in each estate/mill. MCU recording controls that are ineffective at PT. ASM as a whole due to the following:

1. Doctors who have carried out MCU for most employees one (1) month prior to the RSPO stage-2 audit of PT. ASM is transferred from the West Kalimantan region to the Central Kalimantan region.
2. The MCU data is filed by the Medical Staff and 2 weeks before the RSPO audit is taking place, the Medical Officer resigns and hand over the work to the new Medical Officers (who still new and lack of communication).
3. Responding to MCU recording control of PT. ASM, a management review was carried out on September 7, 2018 and was decided by the Regional Head & Area Controller as follows:
 - d) Re-conducted MCU which was coordinated by Doctor Donny (new medical staff).
 - e) MCU copies of employees controlled by Sustainability Staff who act as RSPO & ISPO Document Control PT. ASM.
 - f) Explanation of the importance of controlling the recording of this MCU to the new Medical Persons by Mr. Diar and also to the participants of this ASM management review meeting.

Note:

RSPO & ISPO PT ASM Management review meeting on point No. 3 take place after RSPO & ISPO closing meeting which has been done by auditors of PT Mutuagung Lestari on 7 September 2018.

Correction *(filled by organization audited):*

Related Mill Manager coordination with company doctor for provision the document of MCU and its evaluation based on doctor recommendation.

Corrective Action *(filled by organization audited):*

Implementation of Audit Internal & Management Review.

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

Verification 12 October 2018

Company has shown:

- Medical Check Up document for all workers which has been done on 28 September 2018, where check up covers cholinesterase, Audiometry and Spirometry.
- MCU Document Control Decree.

Based on these explanations, Nonconformity has not been fulfilled, PT ASM needs to clarify with regard to the root of the problem regarding to further clarification regarding "lack of effective recording control". Is it due to PICs that do not yet understand, or control systems (SOPs) that have not been effective.

Verification 15 October 2018

Based on clarification evidence which has been done by management, accordingly the Non-conformity has been fulfilled.

Verified by : **Moh Arif Yusni**

<i>NCR No.</i>	:	2018.09	<i>Issued by</i>	:	Moh Arif Yusni
<i>Date Issued</i>	:	7 September 2018	<i>Time Limit</i>	:	06 September 2019
<i>NC Grade</i> Grade	:	Major	<i>Date of Closing</i>	:	19 December 2018
<i>Standard Ref. & Requirement</i>	:	4.7.2 A documented risk assessment shall be available and its implementation shall be recorded.			
Evidence observed (filled by auditor):					
based on the results of the document review, it is known that there are several activities / activities in the field that have not identified potential hazards and risks, for example, but are not limited to:					
<ul style="list-style-type: none">• Potential Danger/Hazards for fertilizer storage activities• Potential Danger/Hazard for activities in Chemical Warehouses / pesticides• Potential Danger/Hazard for activity at the refueling site					
Based on the results of field visits it was found that there were several risk controls that had not been implemented, for example:					

- Found operators in sterilizer station, kernel station, boiler station, clarification stations do not use ear protectors
- Found security who smoked around the area of the Solar Tank in Bengkuang Raya Estate
- Found a dump truck driven by an unauthorized employee in Division 1 of Pembangunan Raya Estate (Unloading Workers).

Non-Conformance Description (filled by auditor):

HIRAC Document not include all of the activities in company operational area

Root Cause Analysis (filled by organization audited):

Lack of HSE Officer control related to HIRAC for overall operation in BRYE for fertilizer storage, chemical handling (pesticides), solar refueling and Safety Awareness for employees working safely (Unsafe action) and lack of PRYM HSE Officer control in safety awareness (PPE use).

Correction (filled by organization audited):

1. Completing the HIRAC document for fertilizer storage, handling chemicals (pesticides), refuelling diesel activities at BRYE by HSE Officer.
2. Safety Briefing for Safe Working Procedure to all identified employees who carrying out unsafe actions during the RSPO audit by the Auditor.

Corrective Action (filled by organization audited):

1. HIRAC socialization for activities: storage of fertilizers, handling of chemicals (pesticides), refuelling of diesel fuel, driver dump trucks to all employees related by HSE Officer BRYE and HIRAC socialization / factory operations by HSE Officer PRYM.
2. HSE Officer inspections of HSE Officers at each Work Unit periodically.

Assessor Evaluation and Conclusion (filled by auditor):
Verification 19 December 2018

The company shows the following documents:

- Socialization record of Smoking Prohibition.
- Records of affirmation socialization to Dump Truck driver
- Records of PPE socialization
- The latest HIRAC document that contains refueling activities, storage of fertilizers and pesticides

Based on the document review, Nonconformities have been fulfilled and will be observed regarding consistency in the field in the next assessment activities.

Verified by : Moh Arif Yusni

NCR No.	: 2018.10	Issued by	: Steve Mualim
Date Issued	: 7 September 2018	Time Limit	: ASA-1
NC Grade	: Minor	Date of Closing	: 09 October 2018
Standard Ref. &	: 5.2.4		

Requirement	Once the management plan is prepared, continuous monitoring documentation and report regarding the status of the RTE and HCVs are affected by the operations of the plantation and palm oil mill shall be available, and the results of monitoring are to be used to follow-up on the improvement of the management plan.
Evidence observed (filled by auditor): Company have established 2017-2018 HCV management plan and Internal memo No 002/AM-SUST/05/2018 from Area Controller 7A clearly stated that HCV monitoring are conducted every month. Current HCV monitoring were conducted every 2 months.	
Non-Conformance Description (filled by auditor): Regarding this, company are not able to show proper HCV monitoring implementation based on HCV management plan and Area Controller internal memo (every 1 month)	
Root Cause Analysis (filled by organization audited): The lack of control by the Assistant Agronomy in each Estate is related to the consistency of the implementation of internal office memo No. 002 / AM-SUST / 05/2018 May 31, 2018 from Area Controller 7A	
Correction (filled by organization audited): Provision of evidence of HCV monitoring & patrol results every month since September and the following month by HCV Officers	
Corrective Action (filled by organization audited): Management reviews regularly by Unit Manager related and quarterly verification by the Sustainable Region.	
Assessor Evaluation and Conclusion (filled by auditor): Verification 09 October 2018 The company showed internal office memo No. 002 / ASM-SUST / 05/2018 dated May 31 2018 from Area Controller 7a to all PT ASM managers regarding the commitment of PT ASM HCV management whose one point (point number 7) explained that routine patrol would be carried out every month monitor include: <ol style="list-style-type: none"> 1. Destruction of HCV areas so that they affect the existing ecosystem 2. Environmental pollution that has an impact on existing flora or fauna 3. Identification of animals found during patrol In addition, the company also showed a memorandum to June 1 2018 from Area Controller 7a regarding the appointment and appointment of HCV PT ASM officers with a job desk to monitor HCV. Periodic evidence of monitoring every month in accordance with the HCV management plan has also been shown for each estate, for example, the October 2018 period for the Pembangunan Raya estate, Belaban Raya estate, and Bengkuang Raya estate. Monitoring is carried out by HCV officers and contains HCV area conditions, HCV signboard conditions, types of wildlife encountered, etc. Based on Root Cause Analysis, Correction, Corrective Action and corrective evidence that addressed, the non conformity on this indicator Stated Closed	
Verified by	: Steve Mualim

NCR No.	: 2018.11	Issued by	: Moh Arif Yusni
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<i>Date Issued</i>	: 7 September 2018	<i>Time Limit</i>	: 06 September 2019
<i>NC Grade</i> Grade	: Major	<i>Date of Closing</i>	: 13 November 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 Labor Union to the workers.		
Evidence observed (filled by auditor): <p>Based on the results of the review of the employee premium list document and payroll in June & July 2018 it is known that there are workers who work on holidays / weekend. Related to this, the company has provided compensation in the form of overtime / premium with varying values for example</p> <ul style="list-style-type: none"> Finding wood activity with overtime compensation of 1 HK (Rp. 102,480) Security officer with 8 hours of compensation paid Rp. 195,145, - <p>Meanwhile in the Minister of Manpower and Transmigration Decree no. 102 of 2004 concerning Overtime and Overtime Work Wages, clause 11 on how to calculate overtime wages, section (b) which states: "If overtime is done on weekly rest days and / or official holidays for 6 (six) working hours working days 40 (forty) hours a week then (b.1.) calculation of overtime wages for the first 7 (seven) hours paid 2 (two) times wages, and the eighth hour paid 3 (three) times wages an hour and overtime ninth and tenth are paid 4 (four) times an hour.</p> <p>Non-Conformance Description (filled by auditor): Mechanism of overtime wage calculation not suitable with government regulation.</p>			
Root Cause Analysis (filled by organization audited): <p>Lack of understanding regarding government regulation compliance on <i>Decision of the Minister of Labor and Transmigration no. 102 of 2004</i></p>			
Correction (filled by organization audited): <ol style="list-style-type: none"> Issuance of IOM by Area Controller for Mechanism of calculating employee wages for weekdays / holidays in accordance with <i>Decision of the Minister of Labor and Transmigration no. 102 of 2004</i> Provision of evidence of payment records for overtime work performed by employees in accordance with <i>Decision of the Minister of Labor and Transmigration no. 102 of 2004</i> Conduct socialization related to the calculation of overtime 			
Corrective Action (filled by organization audited): <p>Implementation of Audit Internal & Management Review.</p>			
Assessor Evaluation and Conclusion (filled by auditor): <p>Verification 6 October 2018 Please attach the IOM Issuance that has been received, sign and socialize to all levels of PT ASM employees along with the corrective action documents mentioned above.</p> <p>Verification 10 November 2018</p>			

Can be shown corrective evidences in the form of:

- Internal Office Memo No. 127 / IOM / RH-Reg4B / X / 2018 dated 10 October 2018 RSPO Findings on Premium Calculation Difference which explains that:

1. Difference in the calculation of premiums to be paid will follow according to the provisions of applicable laws
2. Henceforth the security workers / other job premium calculation based on time follows in accordance with applicable regulations

- Letter Minutes of IOM socialization of PT Agro Sejahtera Manunggal's Premium Security Calculation on November 9, 2018
- Premium calculation clarification minutes / employees working on Sundays / Holidays
- Letter Minutes / proof of payment for security premium calculations on Holidays / Sundays

Regarding the corrective evidence which has been send, non-compliance with this indicator is stated to have not been fulfilled, additional evidence is needed in the form of:

- The procedure for calculating overtime that is converted into a premium

Verification 13 November 2018

Can be shown corrective evidences in the form of:

- Letter Minutes of socialization of writing system working hours on holidays dated November 8, 2018.
- Internal Office Memo No. 004 / ASM-Sust / XI / 2018 regarding Overtime Day Work Writing which explains that:
 1. Each unit must refer to *Decision of the Minister of Labor and Transmigration no. 102 of 2004* concerning Working Time and Overtime Wages
 2. Calculations and Writing calculation of overtime work hours on holidays should be in accordance with *Decision of the Minister of Labor and Transmigration no. 102 of 2004* concerning Working time and Overtime Wages.

Based on the corrective evidence, the Non-conformity has been fulfilled.

Verified by : **Moh Arif Yusni**

<i>NCR No.</i>	:	2018.12	<i>Issued by</i>	:	Steve Mualim
<i>Date Issued</i>	:	7 September 2018	<i>Time Limit</i>	:	ASA-1
<i>NC Grade</i> Grade	:	Minor	<i>Date of Closing</i>	:	12 October 2018
<i>Standard Ref. & Requirement</i>	:	6.5.3 Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where such public facilities are unavailable or inaccessible.			
Evidence observed (filled by auditor): based on the results of a field visit in the housing of PRYE, BLRE and BKRE employees, the condition of the drainage ditch was found to be inadequate (experiencing siltation) and found domestic waste which was placed not in its place (dumped into drainage). Meanwhile in the domestic waste management procedures owned by the company (No. Doc: ASM-SUST-SOP-47) where in clause 7.3.1 explains "All employees and workers in housing, offices and other work facilities are required to dispose of garbage in bins that have been provided."					

Non-Conformance Description (filled by auditor): There is not enough evidence the company provided adequate facilities for workers.	
Root Cause Analysis (filled by organization audited): Lack of awareness from employees & lack of control from HSE Officer related to domestic waste management which has an impact on environmental pollution.	
Correction (filled by organization audited): 1. Socialization of SOP for domestic waste management to all related employees. 2. Housing waste handling according to the management of domestic waste management.	
Corrective Action (filled by organization audited): Monthly inspection of safety, health, environment and Housekeeping by HSE Officer both at operational area and in employee housing.	
Assessor Evaluation and Conclusion (filled by auditor): Verification 12 October 2018 The company has shown the following documents: - Socialization Records of Waste Management & Waste Cleaning in PRYE. - Socialization Records of Domestic Waste Management & garbage cleanliness Procedure at BLRE. - Socialization Records of Domestic Waste Management & garbage cleanliness Procedure at BRYE. Based on the document review, Nonconformities have been fulfilled and will be observed regarding consistency in the field in the next assessment	
Verified by	: Moh Arif Yusni

NCR No.	: 2018.13	Issued by	: Steve Mualim
Date Issued	: 7 September 2018	Time Limit	: 06 September 2019
NC Grade Grade	: Major	Date of Closing	: 27 October 2018
Standard Ref. & Requirement	: 7.3.1 There shall be evidence that no new plantings have replaced primary forest, or any area required to maintain or enhance one or more High Conservation Values (HCVs), since November 2005. New plantings shall be planned and managed to best ensure the HCVs identified are maintained and/or enhanced (see Criterion 5.2).		
Evidence observed (filled by auditor): Document review found that company are perform land clearing after November 2005 without preceded HCV assessment. Regarding this, company shown LUCA, that covered 5,630 ha areas on 2016. Meanwhile audit scope for this ST-2 assessment are ±7085.49 Ha, therefore there is ± 1,455.49 Ha areas were not included on current LUCA.			
Non-Conformance Description (filled by auditor):			

Company are not able to shown land use change analysist for entire operational areas (± 7085.49 Ha) for areas that developed/cleared without preceded HCV assessment since 2005 and RaCP that approved by RSPO

Root Cause Analysis (filled by organization audited):

Lack of coordination between Head Office Sustainability Corporate Personnel in providing LUCA documents for smallholders of PT. ASM

Correction (filled by organization audited):

1. Compliance & Certification Department coordinates with PIC (Sustainability Corporate Specialist) to immediately prepare LUCA documents for smallholders of PT. ASM and send the LUCA ASM document to the RSPO HCV compensation Panel and follow-up the suitability of the LUCA smallholders document PT. The ASM was to PIC on the RSPO HCV Compensation Panel.
2. Provision of LUCA smallholders documents PT. ASM to MAL Auditors.

Corrective Action (filled by organization audited):

Increasing intense coordination & communication with both the BGA's internal corporate sustainability and with the RSPO Secretariat.

Assessor Evaluation and Conclusion (filled by auditor):

Verification 23 October 2018

The company submits corrective evidence in the form of:

- Land use change Analysis of Review Report for Plasma PT Agro Sejahtera Manunggal.
- PT ASM's data submission of smallholder scheme to RSPO on September 27, 2018 with conclusion FCL is 0 with 2.44 ha for remediation.
- Evidence of BGA (Sustainability Specialist) Communication with RSPO on 19 October 2018 (email from RSPO to BGA) regarding LUCA review report - BUMITAMA - PT ASM.

Based on Root Cause Analysis, Correction, Corrective Action and corrective evidence that addressed, the non conformity on this indicator Stated Closed.

Panel 11 January 2019

The company is not be able to shows approval for RaCP from RSPO Secretariate for all certification scope area. Thus, this NCR is considered remain **open**.

16 March 2019

Company management has officially stated through email dated 16 March 2019 which mentioned that scope of audit for Inti will be deducted from previously 5,630.20 ha, to become 4,861.48 ha (after liability for about 768.72 ha), with detail is presented in the following Table:

Area Description	Owned Estate (Inti) – ha	
	Certified Scope	Liability
2009 Planted Area	1,553.39	-
2010 Planted Area	2,818.23	403.50
2011 Planted Area	83.14	319.02
2012 Planted Area	19.05	3.44
Infrastructure and others	387.67	42.76
Total	4,861.48	768.72

Based on explanation above, NCR No. 2018.13 is stated **closed**.

Verified by		: Moh Arif Yusni	

NCR No.	: 2018.14	Issued by	: Moh Arif Yusni
Date Issued	: 7 September 2018	Time Limit	: 6 September 2019
NC Grade	: Major	Date of Closing	: 13 November 2018
Standard Ref. & Requirement	SCCS Module E for CPO Mills: Mass Balance E.3.2 The site shall have documented procedures for receiving and processing certified and non-certified FFBs.		
Evidence observed (filled by auditor): <p>Based on the results of the document review, a field visit revealed that there was an area of $\pm 1,427.11$ Ha of the area not included in the scope of the certification and under the management of each estate namely Belaban Raya Estate ± 299.50 Ha, Bengkuang Raya Estate ± 604.98 Ha and Pembangunan Raya Estate ± 522.63 Ha. The results of field visits and document verification are known that some of these areas are located in the same block as the nucleus estate (certification area) for example in Block H71, I72 Belaban Raya Estate; Block B39, B40 Bengkuang Raya Estate and A17, A18 Pembangunan Raya Estate.</p> <p>Meanwhile, in the procedure of SCCS (ASM-SUST-SOP-43 revision 01 November 24 2017), it is stated that the status of raw materials (POM) originating from RSPO-certified plantations is marked by the use of CSPO Stamps on each fruit letter. Related to this, the company has not been able to show the evidence</p> <ul style="list-style-type: none"> - Mechanisms and implementation in the field related to RSPO-certified and non-certified FFB separation, especially in blocks whose area is divided into two certified or not certified areas. - Method of recording / documenting the receipt of certified and non-certified FFB in the Pembangunan Raya POM <p>Non-Conformance Description (filled by auditor): the company has not been able to show the evidence</p> <ul style="list-style-type: none"> - Mechanisms and implementation in the field related to RSPO-certified and non-certified FFB separation, especially in blocks whose area is divided into two certified or not certified areas. - Method of recording / documenting the receipt of certified and non-certified FFB in the Pembangunan Raya POM <p>Root Cause Analysis (filled by organization audited): Lack of control from the Estate Manager related to the application of identification of RSPO & non-RSPO certified areas that have not been identified through clear boundaries with their block numbers and identification of certified FFB on each FFB Delivery not from Harvest Staff and verification of certified FFB and which is not certified by the weightbridge operator</p> <p>Correction (filled by organization audited):</p> <ol style="list-style-type: none"> 1. Preparation of documentation and identification of boundary procedures in the field for the scope of RSPO certification and non-RSPO certification areas in each Unit: BRYE, BKYE, PRYE, KUD Agro Semesta. 2. Provision of boundary documentation in the field for the scope of RSPO certification and areas that are not RSPO certified in each Unit: BRYE, BKYE, PRYE, KUD Agro Semesta 			

3. providing evidence of the results of verification of RSPO certified FFB and non-RSPO certified according to the *Prosedur Identifikasi dan Kemampuan Telusur Produk*.

Corrective Action (filled by organization audited):

1. Implementation of the Product Tracing & Capability Identification procedure (documentation / recording mechanism related to the area in accordance with the scope of the certification described in this procedure)
2. Implementation of Internal Audit and Management Review.

Assessor Evaluation and Conclusion (filled by auditor):

Verification 12 October 2018

The company submits corrective evidence in the form of:

1. Separation mechanism for certified and non-certified FFB (ASM Document No. - SUST-GDN-01), in the mechanism explains related to
 - Marking the boundaries of certified FFB areas with those not certified
 - Verification of mill is related to the source of FFB from the unit (certified or not)
2. Certified and non-certified FFB separation mechanism training report to the PT ASM Estate Administration and Mill which was held on October 5, 2018
3. Internal Office Memo No. 001 / ASM-SUST / X / 2018 dated October 1, 2018 from the Area controller 7A Regarding the RSPO PT ASM FFB Separation Commitment which explained that to all PT ASM managers to:
 - Conduct an inventory of certified blocks in PT ASM's HGU.
 - Administration of FFB production administration in certified blocks starting from RSPO FFB delivery notes (See RSPO Estate Block attachment) to the Mill. The RSPO FFB delivery notes that was accepted due to the weigh of the plant was then separated & the administration of RSPO FFB registration by the Mill. Estate also recorded the RSPO FFB administration.
4. Training and Monitoring Program for SCCS activities at PT ASM for the 2018/2019 period
5. Data on FFB receipts from each supplier which includes the Farmer / Cooperative Group.
6. List of areas that are certified and not PT ASM certified which explain Blocking, Planting Year and area.

Verification 1 November 2018

Can be shown corrective evidence in the form of an minutes of field activities FFB separation from certificates and non-certificates area in Bengkuang Raya Estate, Belaban Raya Estate and Pembangunan Raya Estate on 31 October 2018, where marking is done is by staining oil palm plants and installing auxiliary markers for certification and non-certification area separators

Regarding the proof of improvement sent by the team, the auditor considered that there was a need to field observation

Verification, 13 November 2018

Based on the results of a field visit on the Palm oil mill on November 12, 2018 it is known that:

- Can be simulated for FFB receipts from areas included in the scope of certification and out the scope of certification
- Can be simulated calculation of FFB, CPO and PK production from areas including the scope of certification
- list of blocks or areas included in the scope of certification

In addition, based on the results of the sample field visit at the Pembangunan Raya Estate Block A12 / A13, Bengkuang Raya Estate Blok B37, C31 and Belaban Raya Estate Blok F67 it is known that

- Marking has been carried out between the areas included in the scope of the certification and beyond the scope of the certification in the form of Paint on the principal of oil palm
- Marking has been done with auxiliary stakes with a distance between stakes \pm 50 meters each
- Can be simulated mechanism of harvesting, collection of FFB and transportation of FFB produced

Based on Root Cause Analysis, Correction, Corrective Action and corrective evidence that addressed, the non conformity on this indicator Stated Closed

Verified by : **Moh Arif Yusni**

<i>NCR No.</i>	: 2018.15	<i>Issued by</i>	: Moh Arif Yusni
<i>Date Issued</i>	: 7 September 2018	<i>Time Limit</i>	: 6 September 2019
<i>NC Grade</i> Grade	: Major	<i>Date of Closing</i>	: 12 October 2018
<i>Standard Ref. & Requirement</i>	: Conformity Checklist of Certificate and Trademark Use		
Evidence observed (filled by auditor): PT Agro Sejahtera Manunggal has not received the RSPO Certificate. Based on the results of the document review, it is known that there is the use of RSPO Trademark in the Fruit Introductory Letter sent to the PKS from each Estate. This is not in accordance with the 2016 RSPO Rules on Market Communications And Claims (TRADEMARK LICENSING BODY; An organization cannot show the evidence has been authorized by the RSPO to issue licenses for the use of the RSPO trademark.).			
Non-Conformance Description (filled by auditor): PT ASM cannot show the evidence has had authorization from RSPO to use <i>Trademark</i> RSPO in accordance with <i>RSPO Rules On Market Communications And Claims 2016</i>			
Root Cause Analysis (filled by organization audited): The lack of control of documents by each Estate is related to the destruction or withdrawal of FFB Delivery letters that have the RSPO Logo for CSPO & CSPK products and apply identification of RSPO certified FFB in each FFB Delivery letter issued by the Estate in accordance with SOP of Product Identification & Capability.			
Correction (filled by organization audited): Application of Product Search Identification & Ability SOP (mechanism for identifying & verifying RSPO certified FFB on each FFB Delivery letters).			
Corrective Action (filled by organization audited): Implementation of Internal Audit & Management Review.			
Assessor Evaluation and Conclusion (filled by auditor): Verification 12 October 2018 The company submits corrective evidence in the form of 1. Socialization FFB Certified Logo Changes on the FFB delivery notes on September 27, 2018 therein describes <ul style="list-style-type: none">- The socialization of the change of the Certified FFB logo no longer uses the RSPO logo but is made a description of Certified FFB on all Estate- Withdrawal of FFB Delivery Letters that still use the RSPO logo on all Estate 2. Evidence FFB Delivery letter used which does not use the RSPO logo			

Based on Root Cause Analysis, Correction, Corrective Action and corrective evidence that addressed, the non conformity on this indicator Stated Closed

Verified by	:	Moh Arif Yusni
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3.4.2. Identification of Findings, Corrective Actions and Observations at ASA-1

NCR No.	:	2020.01	Issued by	:	Satria Adi Putra
Date Issued	:	31 January 2020	Time Limit	:	30 April 2020
NC Grade	:	Critical	Date of Closing	:	18 April 2020
Standard Ref. & Requirement	:	1.1.3 Managed records of requests for information and responses provided.			
Evidence observed (filled by auditor): 1. The company has presented the Register Letter of Entry - D & L-Part-CSR Dept Area Area 7A document, which contains information on recording in the format of date, letter number of entry, description of information, subject, data, person in charge and information. 2. Procedure No. ASM-SUST-SOP-09 Rev 01 dated 3 December 2019 article 7.2.4 states that: - Point A: Information originating from external and internal must be responded by the unit manager or the party appointed by the relevant Public Relations / CSR / D & L no later than 15 days after the information is received. - Point B: Written response must be signed by the Unit Manager before it is submitted to the External / Internal party (who requests the information) and distributed to the relevant stakeholders. - Point D: Communications originating from external sources must be documented in the External Communication Log (Appendix 7.1)					
Non-Conformance Description (filled by auditor): The company has not been able to demonstrate that the implementation of information management is in accordance with the procedures that it has.					
Root Cause Analysis (filled by organization audited): Lack of knowledge from units related to the implementation of communication procedures					
Correction (filled by organization audited): 1. Re-socialization to officers appointed at both estate and factory units related to recording internal information 2. Improve the communication log book so that it complies with RSPO requirements					
Corrective Action (filled by organization audited): Monitoring and evaluating through internal audits and management review meetings					
Assessor Evaluation and Conclusion (filled by auditor): Verification 17 April 2020 The company has shown evidence of improvements including: - Improved Monitoring of the Internal and External Complaints Logbook Records for each Estate with an additional format in the form of input date data input. - Minutes of employee complaint responses at Pembangunan Raya Estate on March 5, 2020. In addition, documents are available in the form of photos attaching complaints handling. - Minutes of employee complaint responses at Bengkuang Raya Estate on March 5, 2020. In addition, documents are available in the form of photos attaching complaints handling. - Minutes of employee complaint responses at Belaban Raya Estate on March 5, 2020. In addition, documents are provided in the form of photos attaching complaints handling. - Minutes of the dissemination of air pollution hazards to the public and PT Agro Sejahtera Manunggal contractor on March 3, 2020. In addition, attachments are provided in the form of photo documentation. Based on the evidence of improvements sent there are still questions that need to be further verified by the auditor team					

including the realization of the corrective action "re-socialization to officers appointed at both estate and factory units related to recording internal information".

Has this been done? Please include proof of its improvement.

Related to the above, the Non-Conformity No. 2020.01 declared unfulfilled.

Verification April 18, 2020

The company has shown evidence of improvement in the form of an official report on the SOP of Complaints of Employees on March 3, 2020, which was attended by 10 participants of PIC complaints handling. Photos and attendance attached.

Related to this, the Non-Conformity No. 2020.01 has been declared fulfilled.

Verified by	:	Satria Adi Putra
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NCR No.	:	2020.02	Issued by	:	Trismadi N
Date Issued	:	31 January 2020	Time Limit	:	ASA-2
NC Grade	:	Non Critical	Date of Closing	:	
Standard Ref. & Requirement	:	3.4.2 For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.			

Evidence observed (filled by auditor):

During the audit activities, there are several evidences sighted as follows:

1. Social Impact Management Plan Implementation year of 2019, such as:
 - a. Land tenurial problem solving: there is double claim and differential of land acquisition prices, it was solved by good communication with the local communities.
 - b. Smallholders Performance: not all community get scheme smallholders, lack of smallholders performance information, cooperative members from outside communities, it was solved by mediation and socialization by Plantation Agency, Cooperative, Head of Village, and cooperative members.
 - c. Development of Community Economic: lack of entrepreneur skills and knowledge of communities, it was solved by make a CSR program in accordance to evaluation of specific project.
 - d. Development of Education quality: lack of education facilities, it was solved by make an education infranstructure on the CSR program.
 - e. Community health elucidation and development of community health: lack of awareness about health knowledge, it was solved by conducting health socialization and medical check up.
 - f. Increasing the preservation of local culture: lack of awareness the youth generation to preserve the local culture, the solution: providing assistance and participating in the preservation of local culture.
 - g. Improvement of worker welfare: OHS training has not been conducted regularly, the completeness of workers PPE is still lacking, worker union have not been formed, the settlement is by providing PPE's and restructurisation of worker union and well cooperates in supporting company operations.
 - h. Increasing of clean water supply: during the dry season, there are several communities have difficulty accessing of clean water, the solution is providing wells and toilet in 2015.
 - i. Electrical connecting for the community in 2011.
 - j. Good communication with related smallholders.
 - k. Based on complaint log book in PRYE period of October to December 2019 sighted that there are several complaint from the worker's. For example: related to the damage of sepcit tank, leaky roof, and clean water has not been distributed to the housing. This information also obtained by interviews with the several employees in PRYE.

Non-Conformance Description (filled by auditor):

However, not all issues or impact of company operations have been identified on the social and environmental management and monitoring plans.

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.	: 2020.03	Issued by	: Trismadi N
Date Issued	: 31 January 2020	Time Limit	: 30 April 2020
NC Grade	: Critical	Date of Closing	: 1 April 2020
Standard Ref. & Requirement	3.4.3. (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.		
Evidence observed (filled by auditor): Based on environment monitoring and management realization on Semester I year of 2019 discussing the impact of plantation and mill operations on several aspects, such as: air quality; vibration & noise; soil&water conservation; liquid & solid waste management; fire potential; disruption of flora & fauna; and public unrest.			
Non-Conformance Description (filled by auditor): However, the evaluations made by the management unit have not been explained trend evaluation, critical level evaluation, and compliance evaluation in accordance to Environment Minister Decree Letter number 45 year of 2005. And also there has not been shown evidence that evaluation been carried out in a participatory manner involving all stakeholders (internal&external).			
Root Cause Analysis (filled by organization audited): Lack of knowledge of new sustainability staff about RSPO P&C Compliance (it causes there are changing of sustainability staff).			
Correction (filled by organization audited): 1. The management unit conducted training about environment monitoring and management realization in accordance to Environment Minister Decree number 45 year of 2005. 2. The management unit revised the environment monitoring and management realization in accordance to Environment Minister Decree number 45 year of 2005.			

3. The management unit sending revised the of environment monitoring and management realization to the relevant agency.

Corrective Action (filled by organization audited):

The management unit will conducted monitoring this report template by regularly internal audit and annual management review.

Assessor Evaluation and Conclusion (filled by auditor):

Verification on 1 April 2020

The management unit were shown several evidences, such as:

- Revision of Environment monitoring and management realization semester II year of 2019, for example:
 1. Soil and Water Conservation Parameter
 - a. Trend evaluation: surface water quality analysis in Bengkuang River, Membuluh I River, Membuluh II River, Belaban River, Bengkuang Estuary, Kediuk River, Kendawangan River, Kendawangan Estuary there are severa changing trend from Semester I of 2018 till Semester II of 2019.
 - b. Critical level evaluation: the non cconformity (above limit) of surface water quality, such as: BOD and pH parameters on several rivers. It causes that there are peat soil area on the certification unit, resulting in decomposition of organic matter, and also caused of high rainfall level.
 - c. Compliance evaluation: the company will be revised the test parameter and river water class from Class II to the Class IV, it considering the environment conditions that the river affected by tides.
 2. Public Unrest Parameter
 - a. Trend evaluation: since semester I of 2018, social conflicts decreases from 12 cases to the nine cases.
 - b. Critical level evaluation: the social conflict faced by certification unit, such as conducted road access corticalization, harvesting ban, and efforts to stop mill operations. However these activities don't represent the communities, it only from individual to take advantage.
 - c. Compliance evaluation: the certification unit has conducted communication and consultation with the communities, in an effort to minimize public unrest. It also carried out the implementation of CSR programs.
- Environment monitoring and management realization reported to the Environment Agency of Ketapang Regency dated 24 March 2020.
- RSPO P&C 2018 workshop dated 17 till 18 December 2019 in BGA Head Office (Jakarta) attended by 24 persons sustainability team, included from PT ASM.

Auditor Conclusions:

Based on above explanations, this nonconformities has been closed.

Verified by : **Trismadi N**

<i>NCR No.</i>	: 2020.04	<i>Issued by</i>	: Satria Adi Putra
<i>Date Issued</i>	: 31 January 2020	<i>Time Limit</i>	: ASA-2
<i>NC Grade</i>	: Non Critical	<i>Date of Closing</i>	: -
<i>Standard Ref. & Requirement</i>	: 3.7.2 Managed training records, if possible, are carried out individually.		

Evidence observed (filled by auditor): The company has shown the Recapitulation of List of Operating Permit Documents for plantation and factory employees detailing the type of training that is owned / given to company employees.	
Non-Conformance Description (filled by auditor): The company has not been able to show that all training records for contract workers have been recorded and managed.	
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.	:	2020.05	Issued by	:	Brigitta Prita
Date Issued	:	31 January 2020	Time Limit	:	30 April 2020
NC Grade	:	Critical	Date of Closing	:	7 April 2020
Standard Ref. & Requirement	:	3.8.16 Registration of Transactions i. Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date. ii. Remove: RSPO certified volumes sold under a different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.			

Evidence observed (filled by auditor):
Based on mass balance data on April – December 2019, it is known that:

CPO.

Apr-Dec 2019 (MT)	
CSPO Sold as RSPO Claim	5,250
CSPO Sold as Conventional	45,905
CSPO Production	13,876
Non CSPO Production	38,173

Total CPO Production	52,049
Stock RSPO	8,626
Remove	7,732

PK

Apr-Dec 2019 (MT)	
CSPK Sold as RSPO Claim	0
CSPK Sold as Conventional	9,335
CSPK Production	2,533
Non CSPK Production	7,031
Total PK Production	9,564
Stock RSPO	229
Remove	2,304

Based on Palm Trace of Pembangunan Raya mil date on January 30, 2020 it is known:

Stock Overview								
Member Information				License Information				
Member Name	Pembangunan Raya Mill, PT Agro Sejahtera Manunggal			License ID	CB83089			
Member ID	RSPO_PO1000004866			Issued By	PT Mutuagung Lestari			
Member Country	INDONESIA			Issued On	28-03-2019			
Member Category	Oil Mill			Start Date	25-03-2019			
Core Product	Palm Oil			End Date	24-03-2020			
				License Status	Active			
Product	Supply Chain Model	Certified Volume*	Announced Volume*	Volume Allocated as Credits*	Volume Sold as Physical*	Volume Sold as Credits*	Volume Removed*	Remaining Certified Volume*
CSPK	Mass Balance	2,782	0	0	0	0	2,267	515
CSPO	Mass Balance	22,256	0	0	5,250	0	0	17,006
FFB_estates	Mass Balance	78,096	0	0	0	0	0	78,096
FFB_scheme_or_ass...	Mass Balance	14,636	0	0	0	0	0	14,636

* Volumes in MT
 Certified Volume* = Original Certified Volume + Carry Over Volume + Extended Volume

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Non-Conformance Description:

Based on the data above, RSPO certified volumes have been sold conventionally and no evidence of removing for CSPO of 7,732 MT and CSPK of 2,304 MT.

Root Cause Analysis :

Lack of experience from the new EHS Officer and the lack of monitoring from the Sustainability and Commercial Staff so that there is still a difference between the CSPK and CSPO credits that have been removed.

Correction :

Removing related to the remaining / difference in CSPO and CSPK credit that has been used for conventional sales.

Corrective Action :

Joint monitoring monthly and quarterly by sustainability and commercial dept for each report and CSPK & CSPO production and sales data entry.

Assessor Evaluation and Conclusion *(filled by auditor):*
Verification, Februari 5, 2020.

Based on palm trace data on February 5, 2020, CSPK has been remove of 2,304 MT and CSPO of 7,732 MT.

Verifikasi, 7 April 2020.

Perusahaan menunjukkan berita acara sosialisasi supply chain mengenai pemisahan buah RSPO & Non RSPO tanggal 19 Maret 2020 berlokasi di ruang meeting Pembangunan Raya Mill kepada PIC terkait. Supply chain dengan peserta sebanyak 10 orang. Materi yang disampaikan antara lain sosialisasi prosedur pemesanan, klaim, penggunaan stempel, prosedur identifikasi dan kemampuan ketelusuran produk, pemisahan administrasi blok-blok yang certified dan non certified, pencatatan administrasi pemisahan SPB TBS Blok RSPO dan lainnya. Selain itu, tersedia berita acara pemeriksaan data supply chain yang dilaksanakan tanggal 6 April 2020 oleh PIC terkait. Berdasarkan penjelasan diatas, maka ketidaksesuaian No.2020.05 dinyatakan telah terpenuhi.

Verification, April 7, 2020.

The company shows the minutes of supply chain socialization regarding the separation of RSPO & Non-RSPO FFB on March 19, 2020, located in the meeting room of Pembangunan Raya Mill to the relevant PIC with 10 participants. The material presented included the socialization of ordering procedures, claims, stamps use, identification procedures and product traceability, the separation of administration of certified and non-certified blocks, administrative records of separation FFB introduction letters of block RSPO and others. In addition, minutes of the supply chain data inspection was carried out on April 6, 2020 by the relevant PIC. Based on the explanation above, the non-conformance No.2020.05 has been fulfilled.

Verified by : **Brigitta Prita**

<i>NCR No.</i>	: 2020.06	<i>Issued by</i>	: Satria Adi Putra
<i>Date Issued</i>	: 31 January 2020	<i>Time Limit</i>	: ASA-2
<i>NC Grade</i>	: Non Critical	<i>Date of Closing</i>	: -
<i>Standard Ref. & Requirement</i>	: 4.2.3 The certification unit strives to keep the parties in the complaint case informed of the progress of the case, including in relation to the agreed schedule and so that the results are shared with relevant stakeholders.		
Evidence observed (filled by auditor): The company has shown a complaint book that is in every estate and mill in which there are several formats are not uniform, including: a) Belaban Raya Estate with Recording Format (Date, Name, Complaint, Follow Up, Person in Charge) b) Bengkuang Raya Estate (Div III) with Recording Format (Name, Division, Issue, Response, Deadline) c) Pembangunan Raya Estate with Recording Format (Date, Employee Name, Division, Issue, Solution, Timeframe)			

- d) Pembangunan Raya Mill with Recording Format (Number, Name of Worker, Position, Worker Complaints, Management Responses, Initials)

The company has a Procedure No. ASM-SUST-SOP-09 Rev 01 dated 3 December 2019 article 7.2.4 states that:

- a) Point A: Information originating from external and internal must be responded to by the unit manager or the party appointed by the relevant Public Relations / CSR / D & L no later than 15 days after the information is received.
- b) Point B: Written response must be signed by the Unit Manager before it is submitted to the External / Internal party (who requests information) and distributed to the relevant parties concerned.
- c) Point D: Communications originating from external sources must be documented in the External Communication Log (Appendix 7.1)

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

The company has not been able to demonstrate that the implementation of complaints management is not in accordance with the procedures that it has.

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

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-

NCR No.	: 2020.07	Issued by	: Satria Adi Putra
Date Issued	: 31 Januari 2020	Time Limit	: ASA-2
NC Grade	: Non Critical	Date of Closing	: -
Standard Ref. & Requirement	<p>6.2.6 DLW is given to all workers, including workers who work on a piece / quota basis, the calculation of wages is based on a quota that can be achieved during regular working hours.</p> <p>Procedural Note: The RSPO Task Force for workers will prepare DLW implementation guidelines, including detailed rules for how to calculate DLW that is expected to be completed in 2019. The RSPO Secretariat will seek to establish UHL guidelines for each palm oil producing country where RSPO members</p>		

operate. , where the benchmark of the Global Living Wage Coalition (GWLC) is not yet available	
Evidence observed (filled by auditor): 1. The company has shown PT ASM's Decent Living Wage Fulfillment Checklist document which contains elements of available facilities, information and document / record references. The elements of the facility include employee wages, food and beverages, clothing, housing, education, health, transportation, recreation and savings. 2. Eligible Wage Calculation Document (Implementing DLW). 3. RSPO Guidance For Implementing A Decent Living Wage document endorsed by the RSPO standard Standing Committee on 1st of June 2019 which states that "if the prevailing wages doesn't match the DLW, the members will have to develop an implementation plan within their respective operation "	
Non-Conformance Description (filled by auditor): The company has not been able to show evidence that the implementation plan in the operational perspective has been made in accordance with the guidelines of the RSPO Guidance For Implementing A Decent Living Wage.	
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	: -

<i>NCR No.</i>	: 2020.08	<i>Issued by</i>	: Satria Adi Putra
<i>Date Issued</i>	: 31 January 2020	<i>Time Limit</i>	: ASA-2
<i>NC Grade</i>	: Non Critical	<i>Date of Closing</i>	: -
<i>Standard Ref. & Requirement</i>	6.7.4 All workers are given health care and are covered by accident insurance. Costs arising from work-related incidents, which result in injury or illness, are covered in accordance with national law or by the certification unit if national law does not provide protection		
Evidence observed (filled by auditor):			
1. The company has shown the Audit document List of Legal and Regulatory Provisions and Regulations No: 004 / ASM-LR / XI / 2019 Rev 4 dated 18 November 2019 which was approved by Region Head 4B. The document states that it has fulfilled Government Regulation No. 14 of 1993 junto No. 84 of 2013 concerning the Implementation of Social Security article 9 paragraph 2 which states that contributions to work accident insurance, death insurance and health care insurance are fully borne by employers.			
2. Document of the number of BPJS Health PT ASM 2019 which states that the average number of BPJS Health participation is 8% of the total workers. In addition there is a target of registration in Phase-1 2020 is 25% of the			

number of members. 3. Based on interviews with local contractors (Angkut TBS - Agro Seriam Mandiri), there are 8 drivers who do not have health insurance (information is currently on progress, but progress cannot yet be demonstrated). Non-Conformance Description <i>(filled by auditor):</i> The company has not been able to demonstrate that all workers are provided health care and are covered by accident insurance in accordance with applicable regulations.	
Root Cause Analysis <i>(filled by organization audited):</i> -	
Correction <i>(filled by organization audited):</i> -	
Corrective Action <i>(filled by organization audited):</i> -	
Assessor Evaluation and Conclusion <i>(filled by auditor):</i> -	
Verified by	: -

NCR No.	: 2020.09	Issued by	: Trismadi N
Date Issued	: 31 January 2020	Time Limit	: ASA-2
NC Grade	: Non Critical	Date of Closing	:
Standard Ref. & Requirement	7.2.8. All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.		
Evidence observed <i>(filled by auditor):</i> During the audit activity there are some evidences, as follows: <ol style="list-style-type: none"> 1. Procedur ASM-SUST-SOP-52 about Hazardous Waste Management explain about specification of hazardous waste, hazardous waste license, hazardous waste places, and reused of hazardous waste and it recording. In addition that there is also form document number BGA-Form-CCS-1101.1-006-R0 about reused of hazardous waste recording. 2. Based on field observation to the Belaban Raya Estate, Block B50 sighted there are chemical containers such as (Regent, Metaprima, Metafuron) disposed to the land with improperly handling. 3. Based on field observation to the hazardous waste store (satellite) in Bengkuang Raya Estate sighted that the specification are not in accordance to procedure and national regulations, for example: there are no emergency response facilities, no hazardous waste symbol and labels, no balance sheets and logbooks. In addition, the actual hazardous waste stock are used oil (1.5 drums), used oil drums (8 drums), used aprons: 1 drum, used chemical container (10 pcs), metaprima (1 sack), and several used lamps. 4. Based on field observation to the hazardous waste store in PRYM sighted there are hazardous waste stock, such as: chemical container (20 pcs), metaprima (1 sack). However not yet recorded in the updated balance sheet and logbook. 5. Based on interview result with the management sighted that chemical containers is using for distribute chemical on the field. There are also uses to distribute fertilizer to the field. However, there are no recording in accordance to BGA-Form-CCS-1101.1-006-R0. 			

Non-Conformance Description (filled by auditor):

Based on above explanation sighted that the chemical container management not comply with the procedure ASM-SUST-SOP-52.

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.	: 2020.10	Issued by	: Trismadi N
Date Issued	: 31 January 2020	Time Limit	: ASA-2
NC Grade	: Non Critical	Date of Closing	:
Standard Ref. & Requirement	: 7.3.2. Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Evidence observed (filled by auditor): During audit activity there are several evidence, such as: <ol style="list-style-type: none">1. Procedure ASM-SUST-SOP-52 about hazardous waste management, explained about hazardous waste bulding, license submit, etc. There are also document BGA-Form-CCS-1101.1-006.R0 about reused of hazardous waste record.2. Based on field observation to the Belaban Raya Estate, block B50 sighted there are metafuron and metaprima disposed to the land.3. Based on field observation to the hazardous waste store (satellite) in Bengkuang Raya Estate sighted that the specification are not in accordance to procedure and national regulations, for example: there are no emergency response facilities, no hazardous waste symbol and labels, no balance sheets and logbooks. In addition, the actual hazardous waste stock are used oil (1.5 drums), used oil drums (8 drums), used aprons: 1 drum, used chemical container (10 pcs), metaprima (1 sack), and several used lamps.4. Based on field observation to the hazardous waste store in PRYM sighted there are hazardous waste stock, such as: chemical container (20 pcs), metaprima (1 sack). However not yet recorded in the updated balance sheet and logbook.5. Based on interview result with the management sighted that chemical containers is using for distribute chemical on the field. There are also uses to distribute fertilizer to the field. However, there are no recording in accordance to BGA-Form-CCS-1101.1-006-R0.6. Based on RSPO internal audit result dated 14 January 2020 there are non compliance on indicator 7.3.2 about chemical container using not in accordance to the procedure. However it still found on this assessment.7. Based on field observation to the Generator Set room in PRYE sighted that there are generator with capacity 125 Kva placed on the soil and without pallet or concrit floor.			

8. Based on field observation to the BRYE generator set room sighted that the pipe design on secondary containment not accordance to the adequate design to prevent environment pollution cases.
9. Based on field observation to the hanch and carry of *Elaidobious camerunicus* sighted that there used oil for prevention of other insect. The management unit also showing correction by changing the oil with salt water dated 20 January 2020.
10. The management unit showing hazardous waste management reporting period of October till November 2019 on January 2020 to the Environment Agency of Ketapang Regency. However it not explained about hazardous waste balance and logbook in accordance to PP No 101 year of 2014.

Non-Conformance Description (filled by auditor):

Based on above explanation sighted that the waste management has not been to the procedure which understand by all workers and staff.

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.	:	2020.11	Issued by	:	Satria Adi Putra
Date Issued	:	31 Januari 2020	Time Limit	:	30 April 2020
NC Grade	:	Critical	Date of Closing	:	01 April 2020
Standard Ref. & Requirement	:	7.7.6 The management of all plantations that are currently still running on peatland is in accordance with the RSPO Guidelines for Best Management Practices (PPT) for the cultivation of oil palm heads that are still running on peat, version 2 (2018) along with related audit guidelines.			
Evidence observed (filled by auditor):					
<div>1. The company has shown a map of the distribution of peat piezometer and peat subsidence, it is known that the area of peat area in PT. ASM covers an area of 887 ha with 4 units of subsidies and piezometers. In addition, there is monitoring of water level monitoring carried out once a month.</div> <div>2. Based on the RSPO Peat Audit Guidance document (P&C 2018) states that:<div>• At least one (1) piezometer per 120 ha, installed in the planted area.</div><div>• Water levels are monitored every week in the collection channel or in the field</div></div> <div>3. The water level (outside the water control structure) at the relevant outlet gate is monitored.<div>a. For areas affected by tidal flow, a daily tidal fluctuation record is available at the outlet point.</div></div>					

Non-Conformance Description (filled by auditor):

The company has not been able to demonstrate the implementation of peatland management in accordance with the RSPO Peat Audit Guidance document (P&C 2018).

Root Cause Analysis (filled by organization audited):

No training has been conducted for water management officers regarding RSPO compliance (RSPO Peat BMP)

Correction (filled by organization audited):

1. Peat area management training is conducted by the R&D dept. To water management officers
2. Add the piezometer so that it meets the requirements
3. Water level monitoring is done every week

Corrective Action (filled by organization audited):

Monitoring is carried out through the implementation of an internal audit by regional sustainability, and the HO and periodically reviewed by the Research Dept.

Assessor Evaluation and Conclusion (filled by auditor):
Verification April 1, 2020

The company has shown evidence of improvements including:

- Minutes of adding water level, piezometer and subsidence pole (Belaban Raya Estate) with details of 5 subsidies installed (2 in BRYE and 3 in BLRE / F64 blocks, G58, J72) and 2 installation plans (in BLRE)
- Weekly piezometer and water level monitoring data from January to March 2020 on BRYE and BLRE
- Documentation in the form of photos of water level monitoring and piezometer from January to March 2020 on BRYE and BLRE
- Minutes of the Piezometer socialization on 27-29 February 2020 by Regional Research 7A staff.
- Minutes of the Water Management training at the floodgates to officers on March 26, 2020

Related to the evidence of improvements that have been given, the non-conformity No. 2020.11 has been declared fulfilled and will be verified again at the next visit.

Verified by : **Satria Adi Putra**

NCR No.	:	2020.12	Issued by	:	Trismadi N
Date Issued	:	31 Januari 2020	Time Limit	:	ASA-2
NC Grade	:	Non Critical	Date of Closing	:	
Standard Ref. & Requirement	:	7.9.1. A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and reported.			
Evidence observed (filled by auditor): Based on document verification sighted that: <div><div>1.</div><div>Diesel and fiber usage for fuel in PRYM period of January to December 2019, for example: diesel usage on December 2019 is 18,230 liter. Whereas fiber usage on December 2019 is 3,138 MT.</div></div> <div><div>2.</div><div>CPO production date from January to December 2019 is 66,373.51 MT.</div></div>					
Non-Conformance Description (filled by auditor): However, the unit of certification unit has not been able to shown efficiency of fossil fuel utilization plan and implementation monitoring to reduce the fossil fuel usage and optimize the use of renewable energy.					
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.	:	2020.13	Issued by	:	Trismadi N
Date Issued	:	31 Januari 2020	Time Limit	:	30 April 2020
NC Grade	:	Critical	Date of Closing	:	11 February 2020
Standard Ref. & Requirement	:	7.10.1 (C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.			
Evidence observed (filled by auditor): The unit of certification showing GHG emission inventory by RSPO Palm GHG Calculator version 4.0. However there are several variance data as follows:					
Estate	FFB production on RSPO GHG Calculator (ton)		Actual FFB production data (ton)		
Bengkuang Raya	15,006.27		15,005.16		
Belaban Raya	7,253.45		6,682.55		
Pembangunan Raya	50,105.66		28,646.36		
Koperasi Agro Seriam Mandiri	7,472.01		21,458.30		
In addition, there are also different information of Area Agro Seriam Mandiri Cooperative and Pembangunan Raya Estate.					
Non-Conformance Description (filled by auditor): The GHG emission inventory has not been in accordance to actual conditions, so the GHG emissions mitigation plan is not appropriate.					
Root Cause Analysis (filled by organization audited): Lack of experience from the new EHS officer who given the task and the lack of monitoring from Sustainability staff. So the GHG emissions calculation get inaccurate.					
Correction (filled by organization audited): Sustainability Specialist was conducted recalculation with data that has been review together with EHS officer, GIS, and Estate Manager.					

Corrective Action (filled by organization audited):

Monitoring and reviewing the result of calculations made by sustainability before it send to the RSPO GHG Manager.

Assessor Evaluation and Conclusion (filled by auditor):
Verification on 5 February 2020

The Unit of Certification was shown revision of GHG emission calculation result, for example about FFB received information. Such as:

1. Belaban Raya Estate Certified: 7,253.45 MT
2. Pembangunan Raya Estate Certified: 28,696.54 MT
3. Bengkuang Raya Estate Certified: 15,006.27 MT
4. Koperasi Agro Seriam Mandiri Certified: 21,409.12 MT (planted:
5. Seriam Jaya Estate Certified: 12,944.18 MT
6. Membuluh Sejahtera Estate Certified: 887.02 MT
7. Kel Tani ASM Non Certified: 73,631.91 MT
8. Teluk Rengit Estate Non Certified: 39,899.25 MT

However, there is variance data between GHG calculation with basic information from management unit dated 31 January 2020, there is non certified area which not input to the calculator. Such as:

1. SJYE non certified: 47,066.81 MT (there are no planted area information)
2. MSJE non certified: 44,312.21 MT (there are no planted area information)

Verification on 11 February 2020

The Unit of Certification was shown revision-2 of GHG emission calculation result, there are information FFB received from MSJE&SJYE/Fajar Mandiri Cooperative (Non Certified RSPO) with total 91,379.02 MT. The summary GHG Emissions on below:

Summary Emission

Emmision per product	tCO2e/tProduct
CPO	1.20
PK	1.20

Description	Unit	Value
Oil palm planted on mineral soil	Ha	13664.87
Oil palm planted area on peat	Ha	623.61
Total oil palm planted area	Ha	14288.48
Conservation area (Forested)	Ha	68.00
Conservation area (Non-Forested)	Ha	115.10
FFB Production per hectarge	t/ha	23.78
OER	%	22.80
KER	%	3.98

Mill Emissions and Credits

Emissions Sources	tCO2e	tCO2e/tFFB
POME	57061.86	0.20
Fuel Consumption	545.21	0.00

Grid Electricity Utilisation	0.00	0.00					
Credits	-	-					
Export of Grid Electricity to Housing & Grid	-4.75	0.00					
Sales of PKS	0.00	0.00					
Sales of EFB	0.00	0.00					
Total	57602.31	0.20					

Descripton	Own plantation		Group plantation		3 rd party		Total
Emissions Sources	tCO ₂ e	tCO ₂ e/tFFB	tCO ₂ e	tCO ₂ e/tFFB	tCO ₂ e	tCO ₂ e/tFFB	
Land conversion	27184.64	0.53	18498.50	0.30	9700.87	0.00	55384.01
CO ₂ emissions from fertilizer	5332.44	0.10	3078.30	0.43	2102.35	0.00	10513.08
N ₂ O emissions from Peat	6312.44	0.12	0.00	0.00	0.00	0.00	6312.44
N ₂ O emissions from Fertiliser	4351.70	0.09	2572.76	0.36	1740.56	0.03	8665.02
Fuel Consumption	589.99	0.01	878.41	0.12	927.81	0.00	2396.21
Peat Oxidation	46042.00	0.90	0.00	0.00	0.00	0.00	46042.00
Sinks							
Crop Sequestration	-49298.88	-0.97	-30774.55	-4.31	-23961.44	0.00	-104034.87
Sequestration in Conservation Area	-623.56	-0.01	0.00	0.00	0.00	0.00	-623.56
Total	39890.76	0.78	-5746.58	-0.81	1554.94	0.00	35699.12

Conclusion:
Based on above information, this non conformity has been closed out.

Verified by	:	Trismadi N
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3.4.3. Opportunity for Improvement

No	Ref. Std.	Description
1	6.4.2	Ensuring the minimum age for recruitment of workers
2	7.2.3	The company has the opportunity to evaluate IPM plans to reduce the use of chemicals for rat pest control
3	7.7.2	The company has the opportunity to inform HCV areas of deep peat in BLRE in block F57-F60 in the subsequent reporting of peat inventory.
4	7.8.3.	The certification unit to be considers to evaluate the quarterly reporting format for effluent treatment plant, referring to Environment Minister Decree No 29 year of 2003. For example: informing result of daily measurement of pH effluent, as well as annual soil test results
5	7.12.4.	The Unit of Cerification to be consider to evaluate the HCV management and monitoring area involving all relevant stakeholders with the wider landscape level to prevent damage of HCV area by other parties.

3.4.4. Noteworthy Positive Components

No	Ref. Std.	Description
1		The unit of certification has commitment to implement sustainable palm oil principle.
2		The unit of certification has obtain ISPO Certificate.
3		There are BSS, BHS and BMS on the estates operational.

3.5 Summary of Arising Issues from Public and Auditor Verification.

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Tuesday, January 28th, 2020. Gender Committee of Bengkuang Raya Estate.</p> <p>Based on interview with head of gender committee and secretary are known, gender committee has been established since 2018. There are 8 people member of committee gender. Based on interview there is no complaint related sexual harassment. The representative has been socialization related procedure of complaint. Beside that there is socialization related reproductive rights for woman, example menstruation leaves as many as 3 days and it must have recommendation from clinic. There is pregnant leave as many as 3 months; 1 ½ before and after give birth.</p>	<p>There are no negative issues that need further verification. The company was formed a Gender Committee. Described in Criteria 6.1.</p>
<p>LKS Bipartit of Bengkuang Raya Estate.</p> <p>Based on interview with head and secretary of <i>LKS Bipartit</i>. Member of <i>LKS Bipartit</i> all workers in Bengkuang Raya Estate. Meeting of <i>LKS Bipartit</i> was conducted every 3 months. Latest meeting was conducted on June or July 2019. The content of the meeting is problem of housing area likes water and waste management. It has been solving by the company. The company has provided drum of water and others.</p> <p>Besides that, there is raise of wages for January 2020, it will be paid on February 2020 and there is no complaint related PPE, wages, insurance, overtime and others.</p>	<p>There are no negative issues that need further verification. The company has Worker Union. Described in Criteria 6.2.</p>
<p>Head of Harapan Manis Hamlet</p> <ul style="list-style-type: none"> - The company has empowered the surrounding community, among others by building smallholder partnership, employment of villager, and participatory CSR programs. - There are no land dispute. - There is no environment pollution issues. - There are a cooperation related of fire handling with the surround community (Manggala Agni). - 30 % of community is work as employees of PT ASM. - The company conduct discussion in determining the CSR with the community/villager. - There are sosialization related endangred species and conservation area. 	<p>The Company has provided evidence of community development programs.</p> <p>The results of the assessment there are no cases of land disputes or environmental pollution that affect the village community.</p>
<p>Five persons of Previous Land Owner from Seriam Village.</p> <ul style="list-style-type: none"> - On behalf Ulis was released land to the company year of 2008. - On behalf Athil, Mensuhi, Ujit and Junung were released land to the company year of 2010 to 2012. 	<p>It has been verified.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> - The company has been conducted FPIC process on the land compensation. - Field mapping were conducted with involving community leaders, land owner and adjacent land owners as witnesses. - There are no paramilitary using on land compensation process. - The price of land compensation in accordance to negotiation process. 	
Agro Seriam Mandiri Cooperative <ul style="list-style-type: none"> - Currently there is bank credit to be done by the cooperative - The cooperative has a 681 members. - The MoU is valid until 2023. - Regularly meeting was conducted to discuss the profit of plasma. - FFB payment has been made based on the price of FFB (<i>Dinas Perkebunan</i>). The company has socialized the price of FFB to the cooperative board. - There is no wildlife conflict with the company. 	It has been verified.
Environmental Agency, Ketapang Regency <ul style="list-style-type: none"> - The Company already has environmental permit documents that area still valid. - Mandatory reports related environmental has been submitted regularly. - Currently there are no cases of environmental pollution. - There are no conflict with the wildlife during last year on the company operational. 	During the assessment, known that environmental permits are still valid. The Mandatory reports related environmental has been submitted regularly. There is no cases of environmental pollution.
Manpower and Transmigration of Ketapang Regency <ul style="list-style-type: none"> - Normatively related to regulatory compliance, licensing and reporting has been well-documented. - The Company guarantees freedom of association of employees and the company has a LKS Bipartite - The operator's license for related work on the PT ASM plantation has been owned by the company - Company has reported labor required to report on a regular basis. - All Employees has been covered with BPJS 	The company has follow minimum wage has operators that have been certified, such as lift aircraft carrier transporters, steam, etc
Plantation Agency of Ketapang Regency. <ul style="list-style-type: none"> - there was no addition to the location permit, the plantation business permit. - Reports on plantation business development have been sent every 3 months and routinely delivered by the Company. 	There is no change or addition related legalities. The <i>LKUP</i> has been report to Plantation Agency.

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> - Plasma and CSR reports are listed in the plantation business development report. - Evidence of receipt of the report will be verified to PT ASM. 	
<p>Local contractor for FFB Transportation (CV Agro Seriam Mandiri) (FFB from Division 1 & 2 Cooperative of Agro Seriam Mandiri).</p> <p>Based on interview with local contractor, they have 8 vehicles for FFB transportation with 8 drivers. The company provide PPE (shoes and helmet). Insurance has been progress; the company help the contractor to providing the documents. The payment for contractor has been paid every month and there is slip for every payment. There is CLA between the company and contractor, the copy has been kept by the contractor.</p>	<p>It has been verified on criteria 2.2.</p>

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY
4.1	Formal Sign-off of Assessment Findings
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;"> <p>PT Agro Sejahtera Manunggal Management Representative</p>  <p><u>Nandang Mulyana</u> 18 April 2020</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><u>Trismadi Nurbayuto</u> 18 April 2020</p> </div> </div>

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

No	Institution/NGO/Community	Address	Phone/Email	Form of Communication	Date of Contact	Response	
						Yes	No
1	Plantation Agency	Regency of Ketapang	-	Interview by phone	29 January 2020	√	
2	Environmental Agency	Regency of Ketapang	-	Interview by phone	29 January 2020	√	
3	Manpower Agency	Regency of Ketapang	-	Interview by phone	29 January 2020	√	
4	Head of Harapan Manis Hamlet	Regency of Ketapang	-	Direct Interview	28 January 2020	√	
5	Local Contractor (CV Agro Seriam Mandiri)	Regency of Ketapang	-	Direct Interview	28 January 2020	√	-
6	Five persons of Previous Land Owner from Seriam Village.	Regency of Ketapang	-	Direct Interview	28 January 2020	√	-
7	Board of Agro Seriam Mandiri Cooperative	Regency of Ketapang	-	Direct Interview	28 January 2020	√	
8	Gender Committee	Regency of Ketapang	-	Direct Interview	28 January 2020	√	-
9	Bipartite PT ASM	Regency of Ketapang	-	Direct Interview	28 January 2020	√	-
10	Gender Committee	Ketapang Regency	-	Interview	28 January 2020	√	-
11	Local contractor for FFB Transportation (CV Agro Seriam Mandiri) (FFB from Division 1 & 2 Cooperative of Agro Seriam Mandiri).	Ketapang Regency	-	Interview	28 January 2020	√	-
12	Worker union <i>LKS Bipartit</i>	Ketapang Regency	-	Interview	28 January 2020	√	-
13	Pembangunan Raya Mill - Sterilizer : 1 Operator - Boiler Room : 1 operator - Press Room : 1 operator - Engine Room : 1 operator - Kernel Room : 1 operator - Grading Station : 4 operator	PT ASM	-	Direct Interview	28 January 2020	√	-
14	Belaban Raya Estate - 2 harvesting workers - 1 foreman of harvesting - 1 Fertilizing Foreman - 2 Fertilizing workers - 1 foreman of spraying - 3 spraying workers - 3 FFB transpot workers	Ketapang Regency		Interview	28 January 2020	√	-

15	Bengkuang Raya Estate - 2 harvesting workers - 1 foreman of harvesting - 1 Fertilizing Foreman - 4 Fertilizing workers - 1 foreman of spraying - 3 spraying workers	Ketapang Regency		Interview	29 January 2020	√	-
16	Pembangunan Raya Estate (Plasma) - Spraying – 4 workers Harvesting – 2 workers and 1 clerk harvesting	PT ASM	-	Direct Interview	30 January 2020	√	-
17	World Wide Fund	Jakarta		Questionare	14 January 2020	-	√
18	Wahana Lingkungan Hidup Indonesia	Jakarta		Questionare	14 January 2020	-	√
19	Sawit Watch Indonesia	Jakarta		Questionare	14 January 2020	-	√
20	Aliansi Masyarakat Adat Nasional			Questionare	14 January 2020	-	√

Appendix 2. Assessment Program

Date	27 January to 1 February 2020	
PROGRAM	AUDIT PROCESS	AUDITOR
Monday, 27 January 2020		
05.15 – 06.55	Jakarta → Pontianak	All Auditor
09.40 - 10.30	Pontianak → Ketapang	All Auditor
11.00 – 12.00	Break and Lunch	All Auditor
12.30 – 16.00	Ketapang → PT ASM (site)	All Auditor
16.00 – 17.00	Opening Meeting Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Determine of Field Visit, Transparency and Confidentiality Clarification)	All Auditor
Tuesday, 28 January 2020		
08.00 – 12.00	Field Observation to Belaban Raya Estate <ul style="list-style-type: none"> BMP, safety, worker welfare and complaint mechanism Hazardous Waste Material (B3) management; Worker facilities (housing, health clinic, clean water, etc), Land fill, Fire fighting facilities , Storage, ect. Observation to HCV Area and Legal Boundaries 	<ul style="list-style-type: none"> JKP TNB TNB
	Public consultation: <ul style="list-style-type: none"> With previous land owner (if any) and local communities surrounding the plantation area. Government Agencies (by phone) Internal and external stakeholder (Cooperative, Labor Union, Gender Committee, Local Contractors, etc.) 	<ul style="list-style-type: none"> SAP BRP BRP
12.00 – 14.00	Break	All Auditor
14.00 – 17.00	Field Observation to Pembangunan Raya POM <ul style="list-style-type: none"> Process Station, Safety Aspect and Worker Welfare (Grading – despatch) ETP; WTP; Hazardous Waste Warehouse; Drainage; Collecting place of fiber, Water Discharge, Hazardous Warehouse; Workshop, Chemical Store. Water Intake, Land Application Supply Chain 	<ul style="list-style-type: none"> SAP/JKP TNB TNB BRP
Wednesday, 29 January 2020		
08.00 – 12.00	Field Observation to Bengkuang Raya Estate <ul style="list-style-type: none"> BMP, safety, worker welfare and complaint mechanism Hazardous Waste Material (B3) management; Worker facilities (housing, health clinic, clean water, etc), Fire fighting facilities , Storage, ect. Observation to HCV Area, Land fill, and Legal Boundaries 	<ul style="list-style-type: none"> SAP/JKP TNB BRP
12.00 – 14.00	Break	All Auditor
14.00 – 17.00	Document Review: <ul style="list-style-type: none"> Verification of Basic Information Mill & Estate Confirmation Time Bound Plan Review of Partial Certification Verification previous NCR 	All Auditor

Thursday, 30 January 2020		
08.00 – 12.00	Field Observation to Pembangunan Raya Estate & KKPA Pembangunan Raya (Cooperative Agro Seriam Mandiri) <ul style="list-style-type: none"> BMP, safety, worker welfare and complaint mechanism Hazardous Waste Material (B3) management; Worker facilities (housing, health clinic, clean water, etc), Land fill, Fire fighting facilities, Storage, etc. Observation to HCV Area, Land fill, and Legal Boundaries 	<ul style="list-style-type: none"> SAP/JKP TNB BRP
12.00 – 14.00	Break	All Auditor
14.00 – 17.00	Document Review: <ul style="list-style-type: none"> Verification of Basic Information Mill & Estate Confirmation Time Bound Plan Review of Partial Certification Verification previous NCR 	All Auditor
Friday, 31 January 2020		
08.00 – 11.00	Closing meeting preparation & Document Review: <ul style="list-style-type: none"> Verification of Basic Information Mill & Estate Confirmation Time Bound Plan Review of Partial Certification Verification previous NCR 	All Auditor
11.00 – 14.00	Break	All Auditor
15.00 – 17.00	Closing Meeting	All Auditor
17.00 – 20.00	Kendawangan (site) → Ketapang	All Auditor
Saturday, 1 February 2020		
07.00 – 07.40	Ketapang – Pontianak	All Auditor
08.20 – 09.45	Pontianak – Jakarta	All Auditor