

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

**[ ✓ ] Surveillance**

Name of Management : Betung POM – PT Laguna Mandiri subsidiary of Sime Darby Plantation Bhd  
Organisation

Plantation Name : Sekayu Estate and Betung Estate

Location : Betung Village, Pamukan Utara Sub District, Kotabaru District, Kalimantan Selatan Province, Indonesia

Certificate Code : **MUTU-RSPO/035**

Date of Certificate Issue : 28 June 2019

Date of License Issue : 01 July 2020

Date of Certificate Expiry : 31 March 2024

Date of License Expiry : 31 March 2021

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-1.1	10 to 14 March 2020	Trismadi Nurbayuto (Lead Auditor), Brigitta Prita, Yudhi Yuniarto T, Nurdin Chaeriana	Octo H.P. N Nainggolan	Ardiansyah

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-1.1	15 June 2020

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**Figure 1. Location Map of PT Laguna Mandiri**

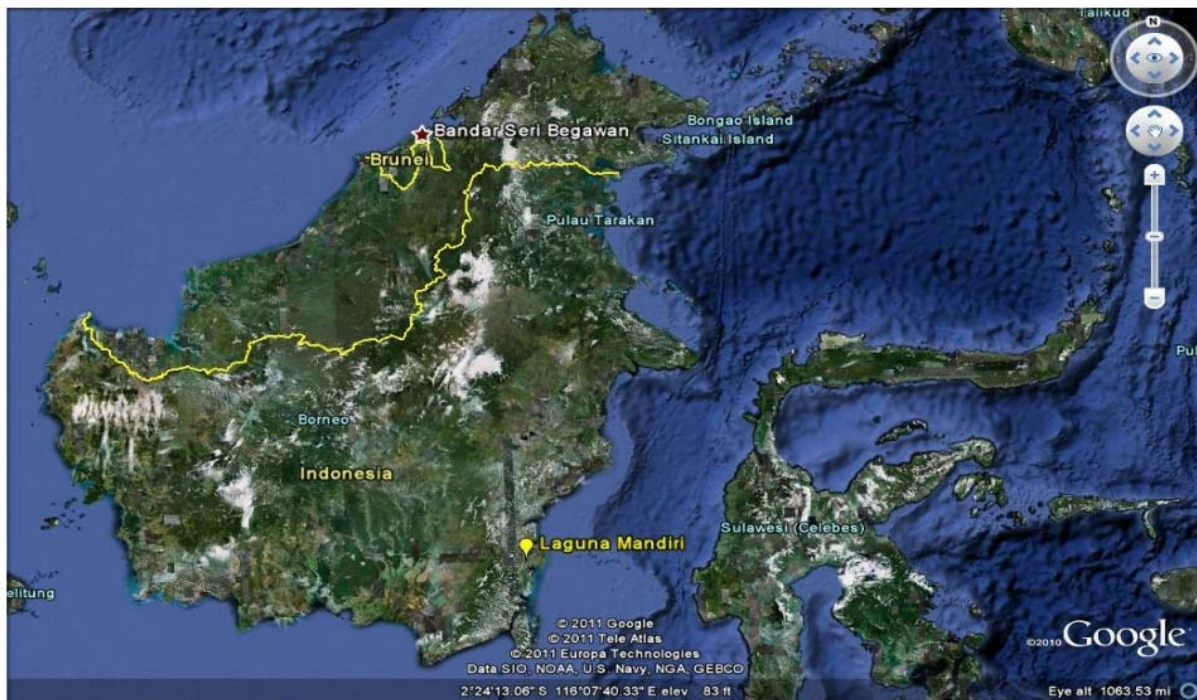
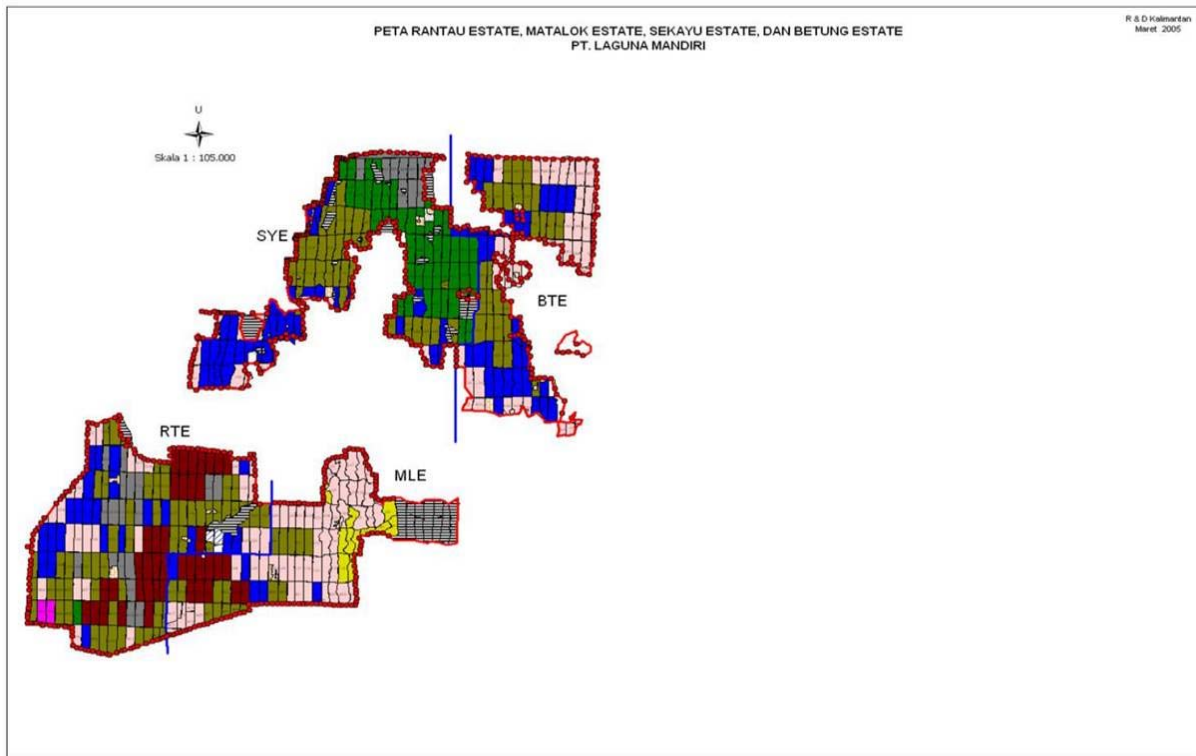


Figure 2. Operational Map of PT Laguna Mandiri



**Abbreviations Used**

AMDAL	:	<i>Analisis Mengenai Dampak Lingkungan</i> (Environmental Impact Assessment)
ANDAL	:	<i>Analisis Dampak Lingkungan</i> (Environmental Impact Assessment)
APAR	:	<i>Alat Pemadam Api Ringan</i> (Fire Extinguishers)
ASA	:	Annual Surveillance Assessment
BJR	:	<i>Berat Janjang Rata-rata</i> (Average Bunch Weight)
BPD	:	<i>Badan Permusyawaratan Desa</i> (Village Consultative Body)
BMKG	:	<i>Badan Meteorologi, Klimatologi, dan Geofisika</i> (Meteorology Climatology and Geophysics Council)
BOD	:	Biological Oxygen Demand
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i> (Social Assurance of Labor)
BPN	:	<i>Badan Pertanahan Nasional</i> (National Land Agency)
BTE	:	Betung Estate
BTF	:	Betung Factory
BUMDES	:	<i>Badan Usaha Milik Desa</i> (Village-Owned Enterprises)
B3	:	<i>Bahan Berbahaya dan Beracun</i> (Hazardous and toxic materials)
CB	:	Certification Body
CECT	:	Close Ended Conservation Trenches
CH	:	Certificate Holder
CLA	:	Collective Labour Agreement
COD	:	Chemical Oxygen Demand
CPO	:	Crude Palm Oil
CSR	:	Corporate Social Responsibility
EFB	:	Empty Fruit Bunch
EIA	:	Environment Impact Assessment
EM	:	Estate Manager
FFB	:	Fresh Fruit Bunch
FPIC	:	Free Prior Informed and Consent
GHG	:	Green House Gas
GM	:	General Manager
HCV	:	High Conservation Value
HGU	:	Land Use Title
HIRAC	:	Hazard Identification, Risk Assessment and Control
ID	:	Identity
IDR	:	Indonesian Rupiah
IUP	:	<i>Izin Usaha Perkebunan</i> (
JHT	:	<i>Jaminan Hari Tua</i> (Old Age Benefit)
JKK	:	<i>Jaminan Kecelakaan Kerja</i> (Work Accident)
JKM	:	<i>Jaminan Kematian</i> (Dead Insurance)
JKS	:	<i>Jaminan Kesehatan</i> (Health Insurance)
JP	:	<i>Jaminan Pensiun</i> (Retirement Insurance)
KER	:	Kernel Extraction Rate
KKPA	:	<i>Kredit Koperasi Primer Anggota</i> (Member Primary Cooperative Credit)
LA	:	Land Application
LMI	:	Laguna Mandiri (PT)
LTA	:	Lost Time Accident
LUCA	:	Land Use Change Analysis
MSDS	:	Material Safety Data Sheets
NC	:	Non-Conformity/ies
NCR	:	Non-Conformity/ies Report

NGO	:	Non-Government Organization
OER	:	Oil Extraction Rate
OFI	:	Opportunity for Improvement
OHS	:	Occupational Health and Safety
OHSE	:	Occupational Health Safety and Environment
PIC	:	Person In Charge
PK	:	Palm Kernel
PKS	:	<i>Pabrik Kelapa Sawit</i> (Palm Oil Mill)
PKWT	:	<i>Perjanjian Kerja Waktu Tertentu</i> (Fixed Term Employment Contract)
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PP	:	<i>Peraturan Perusahaan</i> (Company Regulation)
PPE	:	Personal Protective Equipment
PSD	:	Plantation Service Department
PSQM	:	Plantation Sustainability Quality Management
PTSP	:	<i>Pelayanan Terpadu Satu Pintu</i> (One-Stop Integrated Services)
RaCP	:	Remediation and Compensation Procedure
RC	:	Re-Certification
RKL	:	<i>Rencana Pengelolaan Lingkungan</i> (Environment Management Plan)
RPL	:	<i>Rencana Pemantauan Lingkungan</i> (Environment Monitoring Plan)
RSPO	:	Roundtable Sustainable Palm Oil
RTE	:	Rare, Threatened or Endangered
SBA	:	Sinar Bintang Albar
SDP	:	Sime Darby Plantation
SIA	:	Social Impact Assessment
SOP	:	Standard Operating System
SOU	:	Strategic Operational Unit
SYE	:	Sekayu Estate
TPS LB3	:	<i>Tempat Penyimpanan Sementara Limbah Bahan Berbahaya dan Beracun</i> (Hazardous Waste Temporary Store)
WWTP	:	Waste Water Treatment Plant

<b>1.0</b>	<b>SCOPE of the CERTIFICATION ASSESSMENT</b>								
<b>1.1</b>	<b>Assessment Standard Used</b>	<ul style="list-style-type: none"> <li>Principles and Criteria for the Production of Sustainable Palm Oil 2018, endorsed by the RSPO Board of Governors and adopted at the 15<sup>th</sup> Annual General Assembly by RSPO Member on 15 November 2018.</li> <li>RSPO Certification System for Principles and Criteria, 14 June 2017</li> </ul>							
<b>1.2</b>	<b>Organisation Information</b>								
1.2.1	Organisation name listed in the certificate	PT Laguna Mandiri, subsidiary of Sime Darby Plantation Bhd.							
1.2.2	Contact person	Alagendran A. L. Maniam							
1.2.3	Organisation address and site address	RSPO Registered Company: No 2, Plantation Tower Jalan PJU 1A/7 Petaling Jaya, Malaysia 47301.  Liaison Office: The Plaza Office Tower, 36 <sup>th</sup> Floor. Jl. MH Thamrin kav. 28 – 30, Jakarta – 10350.							
1.2.4	Telephone	+62-21-29926000							
1.2.5	Fax	+62-21-29922686							
1.2.6	E-mail	alagendran.maniam@simedarbyplantation.com							
1.2.7	Web page address	www.simedarby.com							
1.2.8	Management Representative who completed the application for certification	Alagendran A. L. Maniam (Head of PSQM Plantation Minamas Indonesia)							
1.2.9	Registered as RSPO member	1-0008-04-000-00 – 6 September 2004							
<b>1.3</b>	<b>Type of Assessment</b>								
1.3.1	Scope of Assessment and Number of Management Unit	Palm Oil Mill and supply base: <ul style="list-style-type: none"> <li>Betung Factory, Sekayu Estate and Betung Estate</li> </ul>							
1.3.2	Type of certificate	Single							
<b>1.4</b>	<b>Locations of Mill and Plantation</b>								
1.4.1	Location of Mill								
	<b>Name of Mill</b>	<b>Location</b>	<b>Coordinate</b> <table border="1"> <tr> <th>Latitude</th> <th>Longitude</th> </tr> <tr> <td>S 2° 22' 43"</td> <td>E 116° 12' 18"</td> </tr> </table>	Latitude	Longitude	S 2° 22' 43"	E 116° 12' 18"		
Latitude	Longitude								
S 2° 22' 43"	E 116° 12' 18"								
	Betung	Village of Betung, Sub-District of Pamukan Utara, District of Kotabaru, Province of Kalimantan Selatan, Indonesia							
1.4.2	Location of Certification Scope of Supply Base								
	<b>Name of Supply Base</b>	<b>Location</b>	<b>Coordinate</b> <table border="1"> <tr> <th>Latitude</th> <th>Longitude</th> </tr> <tr> <td>S 2° 19' 34"</td> <td>E 116° 10' 58.0"</td> </tr> <tr> <td>S 2° 21' 24"</td> <td>E 116° 11' 45"</td> </tr> </table>	Latitude	Longitude	S 2° 19' 34"	E 116° 10' 58.0"	S 2° 21' 24"	E 116° 11' 45"
Latitude	Longitude								
S 2° 19' 34"	E 116° 10' 58.0"								
S 2° 21' 24"	E 116° 11' 45"								
	Sekayu Estate	Village of Sekayu Baru, Sub-District of Pamukan Utara, District of Kotabaru, Province of Kalimantan Selatan, Indonesia							
	Betung Estate	Village of Betung, Sub-District of Pamukan Utara, District of Kotabaru, Province of							



		Kalimantan Selatan, Indonesia					
1.5	Description of Area Statement						
1.5.1	Tenure						
	• State		15,300.00	Ha			
	• Community		-	Ha			
1.5.2	Area Statement						
	• Total area		7,579.57	Ha			
	• Mature area		5,129.13	Ha			
	• Immature area		790.97	Ha			
	• Mill, emplashment, Road		122.17	Ha			
	• Unplanted area (Riparian and lake)		370.39	Ha			
	• Occupation		1,076.60	Ha			
	• HCV		90.31	Ha			
1.6	Planting Year and Cycles						
1.6.1	Age profile of planting year						
	Planting Year	Hectarage (Ha)					
		Sekayu Estate	Betung Estate	Total			
	1995	1,036.86	-	1,036.86			
	1996	722.72	422.55	1,145.27			
	1997	467.46	717	1,184.46			
	1998	49.38	696.69	746.07			
	2007	-	133.20	133.20			
	2009	-	54.20	54.20			
	2015	-	68.93	68.93			
	2016	404.74	355.40	760.14			
	Sub Total Mature	2,681.16	2,447.97	5,129.13			
	2017	390.52	242.32	632.84			
	2018	158.13	-	158.13			
	Sub Total Immature	548.65	242.32	790.97			
	TOTAL	3,229.81	2,690.29	5,920.10			
1.6.2	New Planting area after January 2010		-	Ha			
1.6.3	Planting Cycle		1 <sup>st</sup> Cycle				
1.7	Description of Mill and Supply Base						
1.7.1	Description of Mill						
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel	
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)



	Betung	45	67,209.88	13,946.24	20.75	4,254.33	6.33
	*Production data source from March 2019 to February 2020						
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)	%
	Sekayu	4,266.00	3,229.81	31,829.13	11.87	31,829.13	100
	Betung	3,313.57	2,690.29	27,165.12	11.09	27,165.12	100
	TOTAL	7,579.57	5,920.10	58,994.25	11.48	58,994.25	100
	*Production data source from March 2019 to February 2020						
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)		
	Selabak Estate (RSPO Certified)	PT Swadaya Andika subsidiary of Sime Darby Plantation Bhd	-	3,327.61	824.87		
	Randi Estate (RSPO Certified)	PT Swadaya Andika subsidiary of Sime Darby Plantation Bhd	-	2,460.27	706.42		
	Matalok Estate (RSPO Certified)	PT Laguna Mandiri, Rantau Mill subsidiary of Sime Darby Plantation Bhd	-	2,630.73	588.26		
	Sangkoh Estate (RSPO Certified)	PT Swadaya Andika subsidiary of Sime Darby Plantation Bhd	-	2,765.57	508.77		
	KKPA Area Sungai Cengal (LMI) (RSPO Certified)	Scheme Smallholder of PT Laguna Mandiri subsidiary of Sime Darby Plantation Bhd	1,382	2,756.90	3,305.07		
	Rantau Estate (RSPO Certified)	PT Laguna Mandiri, Rantau Mill subsidiary of Sime Darby Plantation Bhd	-	4,087.84	421.22		
	Lanting Estate (RSPO Certified)	PT Swadaya Andika subsidiary of Sime Darby Plantation Bhd	-	2,734.62	782.16		
	Bebunga Estate (RSPO Certified)	PT Langgeng Muara Makmur subsidiary of Sime Darby Plantation Bhd	-	3,307.35	31.01		
	BUMDES Mulyoharjo** (Non-Certified RSPO)	Independent smallholders		1,884.63	1,037.07		
	BUMDES Pondok Labu** (Non-Certified RSPO)	Independent smallholders		750	10.79		
	TOTAL					8,215.64	
	*Production data source from March 2019 to February 2020						
	**Production data source from August 2019 to February 2020						
1.7.4	Product categories			FFB, CPO, PK			

1.8	Tonnage of Product									
1.8.1	Past Annual Claim Certified Product		License volume (Tonnes) April 1 <sup>st</sup> , 2019 – March 31 <sup>st</sup> 2020		Actual production for last year					
	FFB Processed		89,969		66,162.03					
	CPO Production		18,893		13,946.24					
	Palm Kernel (PK) Production		4,498		4,254.33					
1.8.2	Product selling									
	Type of selling product		Actual selling product for last year							
	CSPO sold as RSPO certified product		5,088.86							
	CSPK sold as RSPO certified product		2,289.40							
	CSPO sold under other scheme		0							
	CSPK sold under other scheme		0							
	CSPO sold as conventional		6,790.88							
	CSPK sold as conventional		0							
1.8.3	Estimate of Certified FFB Claim									
	Name of Estates		Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)				
	Sekayu		4,266.00	3,229.81	34,050	12.70				
	Betung		3,313.57	2,690.29	29,050	11.87				
	TOTAL		7,579.57	5,920.10	63,100	12.30				
	<i>*Projected FFB production for 01 April 2020 to 31 March 2021</i>									
1.8.4	Estimate of Certified Palm Product Claim									
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO Out put (tonnes)		Extraction (%)	Palm Kernel Out put (tonnes)		Extraction (%)	Supply Chain Module
	Betung	45	63,100	14,500	23	3,780	6	MB		
	<i>*Projected CSPO and CSPK production for 01 April 2020 to 31 March 2021</i>									
1.9	Other Certifications									
	ISPO		The company has obtained Indonesian Sustainability of Palm Oil (ISPO) Certificate since September 9 <sup>th</sup> 2014 (Certificate Number MUTU-ISPO/026).							
1.10	Time Bound Plan									
1.10.1	Time Bound Plan for Other Management Units									
	Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status				
	Mill	Time bound								
	INDONESIA									
1	Sekunyir.	2010	Sekunyir	2010	Seruyan and West	Certified				

	PT. Indotruba Tengah		Seruyan	2010	Kotawaringin District – Central Kalimantan	Certified
2	Manggala. PT. Tunggal Mitra Plantations	2010	Manggala 1	2010	Rokan Hilir District – Riau	Certified
			Manggala 2	2010		Certified
			Manggala 3	2010		Certified
3	Bukit Ajong PT. Sime Indo Agro	2010	West	2010	Sanggau District – West Kalimantan	Certified
			West (HGU on process)	2019		-
			East	2010		Certified
			East (HGU on process)	2019		-
			East Plasma	2010		Certified
			West Plasma	2010		Certified
			Sei Mawang	2019		-
4	Teluk Siak. PT Aneka Inti Persada	2011	Teluk Siak	2011	Siak District – Riau	Certified
			Pinang Sebatang	2011		Certified
			Aneka Persada	2011		Certified
5	Sungai Pinang. PT. Bina Sains Cemerlang	2012	Sungai Pinang	2012	Musi Rawas District – South Sumatera	Certified
			Sungai Pinang (HGU on process)	2020		-
			Bukit Pinang	2012		Certified
			Bukit Pinang (HGU on process)	2020		-
6	Pemantang. PT. Teguh Sempurna	2011	Pemantang	2011	Seruyan and East Kotawaringin District – Central Kalimantan	Certified
			Kawan Batu	2011		Certified
			Hatan Tiring	2011		Certified
			Batang Garing	2011		Certified
7	Alur Dumai. PT Lahan Tani Sakti	2011	Alur Dumai	2011	Rokan Hilir District – Riau	Certified
8	Teluk Bakau. PT. Bhumireksa Nusa Sejati	2011	Teluk Bakau	2011	Indra Giri Hilir District – Riau	Certified
			Nusa Perkasa	2011		Certified
			Nusa Lestari	2011		Certified
9	Mandah PT. Bhumireksa Nusa Sejati	2014	Mandah	2011	Indra Giri Hilir District – Riau	Certified
			Rotan Semelur	2011		Certified
10	Angsana. PT Ladangrumpun Suburabadi	2011	Angsana	2011	Tanah Bumbu District – South Kalimantan	Certified
			Gunung Sari	2011		Certified
			Pantai Bonati	2011		Certified
			KKPA-1 PT.SHE	2013		Certified
			KKPA-4 PT.SHE	2013		Certified
11	Mustika. PT Sajang Heulang	2013	Mustika	2013	Tanah Bumbu District – South Kalimantan	Certified
			KKPA-2 PT.SHE	2013		Certified
			KKPA-3 PT.SHE	2013		Certified

			KKPA-5 PT.SHE	2013		Certified
			SAP 1	2020		-
12	Gunung Aru. PT Bersama Sejahtera Sakti	2011	Gunung Aru	2011	Kotabaru District – South Kalimantan	Certified
			Gunung Kemasari	2011		Certified
			Laut Timur	2011		Certified
			Pantai Timur	2011		Certified
			KKPA BSS	2020		-
13	Bebunga. PT. Langgeng Muaramakmur	2011	Bebunga	2011	Kotabaru District – South Kalimantan	Certified
			Bakau	2011		Certified
			Sungai Cengal	2011		Certified
14	Sukamandang PT Kridatama Lancar	2011	Sukamandang	2011	Seruyan and East Kotawaringin District – Central Kalimantan	Certified
			Sapiri	2011		Certified
			Barasdanum	2011		Certified
			Kuala Kuayan	2011		Certified
15	Pondok Labu. PT Paripurna Swakarsa	2012	Binturung	2012	Kotabaru District – South Kalimantan	Certified
			Pondok Labu	2012		Certified
			Rampa	2012		Certified
			Sesulung	2012		Certified
16	Rantau. PT Laguna Mandiri	2012	Rantau	2012	Kotabaru District – South Kalimantan	Certified
			Matalok	2012		Certified
			KKPA Sungai Cengal (1,382 SH)	2014		Certified
			Selabak (PT SAA)	2012		Certified
			Randi (PT SAA)	2012		Certified
			Sangkoh (PT SAA)	2012		Certified
			Lanting (PT LMR)	2012		Certified
17	Betung. PT Laguna Mandiri	2014	Betung	2012	Kotabaru District – South Kalimantan	Certified
			Sekayu	2012		Certified
18	Ungkaya. PT Tamaco Graha Krida	2012	Ungkaya	2012	Morowali District – Sulawesi Tengah	Certified
			Plasma TGK	2020		-
19	Ladang Panjang. PT Bahari Gembira Ria	2012	Ladang Panjang	2012	Muaro Jambi District - Jambi	Certified
			Ladang Panjang (HGU on process)	2020		-
			Plasma BGR	2020		-
20	Rantau Panjang. PT Guthrie Pecconina Indonesia	2012	Rantau Panjang	2012	Musi Banyuasin District – South Sumatera	Certified
			Rantau Panjang (HGU on process)	2020		-
			Bumi Ayu	2012		Certified
			Karang Ringin	2012		Certified
			Napal	2012		Certified

			Napal (HGU on process)	2020		-
			Mangun Jaya	2012		Certified
			Mangun Jaya (HGU on process)	2020		-
			Sungai Jernih	2020		-
			GPI KKPA	2020		-
21	Blang Simpo. PT Perkasa Subur Sakti	2013	Tamiang (PT PPP)	2013	Aceh Tamiang and East Aceh District – Aceh	Certified
			Batang Ara (PT PSK)	2013		Certified
			Blang Simpo-01	2013		Certified
			Blang Simpo-02	2013		Certified
22	Lembiru. PT Sandika Nata Palma	2014	Lembiru	2014	Ketapang District – West Kalimantan	Certified
			Awatan	2014		Certified
			Karya Palma	2020		-
			KKPA SNP	2020		-
			Pelanjau (PT BAL)	2019		Certified
			Sungai Putih (PT BAL)	2020		-
			Baturus (PT BAL)	2020		-
			KKPA BAL	2020		-
MALAYSIA						
1	Sg Dingin SOU 1	2010	Bukit Hijau	2010	Kerangan, Kedah	Certified
			Padang Buluh	2010		Certified
			Bukit Selangor	2010		Certified
			Sg Dingin	2010		Certified
			Jentayu	2010		Certified
			Anak Kuli	2010		Certified
			Somme	2010		Certified
2	Chersonese SOU 2	2011	Chersonese	2011	Kuala Kurau, Perak	Certified
			Holyrood	2011		Certified
			Kalumpang	2011		Certified
			Tali Ayer	2011		Certified
3	Elphil SOU 3	2011	Kinta Kellas	2011	Sg Siput, Perak	Certified
			Elphil	2011		Certified
			Kamuning	2011		Certified
4	Flemington SOU 4	2011	Flemington	2011	Teluk Intan, Perak	Certified
			Bagan Datoh	2011		Certified
			Sabak Bernam	2011		Certified
			Sg Samak	2011		Certified
5	Seri Intan SOU 5	2011	Seri Intan (Main Division)	2011	Teluk Intan, Perak	Certified
			Sabrang	2011		Certified

			Sg Wangi	2011		Certified
			Sogomana (Main Division)	2011		Certified
6	Selaba SOU 5	2011	Seri Intan (Selaba Division)	2011	Teluk Intan, Perak	Certified
			Sogomana (Cashwood & Sg Beruas Division)	2011		Certified
			Bikam	2011		Certified
			Clumy	2011		Certified
7	Tennamaram SOU 6	2011	Tennamaram	2011	Bestari Jaya, Selangor	Certified
			Sungei Buloh	2011		Certified
			Bkt Talang	2011		Certified
8	Bkt Kerayong SOU 7	2011	Bkt Kerayong	2011	Kapar, Selangor	Certified
			Bkt Cherakah	2011		Certified
			Bkt Rajah	2011		Certified
			Bkt Lagong	2011		Certified
			Elmina	2011		Certified
9	East SOU 8	2010	East	2010	Carey Island, Selangor	Certified
			Dusun Durian	2010		Certified
			Sepang	2010		Certified
10	West - SOU 9	2010	West	2010	Carey Island, Selangor	Certified
11	Bukit Putri - SOU 10	2011	Bukit Putri	2011	Raub, Pahang	Certified
12	Kerdau SOU 11	2011	Kerdau	2011	Temerloh, Pahang	Certified
			Jentar	2011		Certified
			Mentakab	2011		Certified
			Sg Mai	2011		Certified
			Chenor	2011		Certified
13	Jabor - SOU 12	2011	Jabor	2011	Kemaman, Trengganu	Certified
14	Labu SOU 13	2011	Labu	2011	Nilai, Negeri Sembilan	Certified
			New Labu	2011		Certified
			Bradwall	2011		Certified
15	Tanah Merah SOU 14	2010	Tanah Merah	2010	Port Dickson, Negeri Sembilan	Certified
			Sua Betong	2010		Certified
			Bukit Pelandok	2010		Certified
16	Sua Betong SOU 15	2014	Salak	2014	Port Dickson, Negeri Sembilan	Certified
			Sengkang	2014		Certified
			Siliau	2014		Certified
			PD Lukut	2014		Certified
			Sungai Baru	2014		Certified
			Tampin Linggi	2014		Certified

17	Kok Foh SOU 16	2011	Bukit Pilah	2011	Bahau, Negeri Sembilan	Certified
			Kok Foh	2011		Certified
			Muar River	2011		Certified
			St. Helier	2011		Certified
			Pertang	2011		Certified
			Sg Gemas	2011		Certified
			Sg Sebaling	2011		Certified
			Sg Senarut	2011		Certified
18	Kempas SOU 17	2010	Kempas	2010	Jasin, Melaka	Certified
			Kemuning	2010		Certified
			Tangkah	2010		Certified
19	Diamond Jubilee SOU 18	2011	Bukit Asahan	2011	Jasin, Melaka	Certified
			Diamond Jubilee	2011		Certified
			Serkam	2011		Certified
20	Pagoh SOU 19	2014	Pagoh	2014	Muar, Johor	Certified
			Lanadron	2014		Certified
			Pengkalan Bukit	2014		Certified
			Welch	2014		Certified
21	Chaah SOU 20	2010	North Labis	2010	Chaah, Johor	Certified
			Cha'ah	2010		Certified
			Sg Simpang Kiri	2010		Certified
22	Gunung Mas SOU 21	2010	Gunung Mas	2010	Kluang, Johor	Certified
			Kempas Klebang	2010		Certified
			Bukit Paloh	2010		Certified
			Yong Peng	2010		Certified
23	Bukit Benut SOU 22	2011	Bukit Benut	2011	Kluang, Johor	Certified
			CEP Niyor	2011		Certified
			Lambak / Elaeis	2011		Certified
24	Ulu Remis SOU 23	2011	Pekan	2011	Layang-layang, Johor	Certified
			Sembrong	2011		Certified
			Tun Dr. Ismail	2011		Certified
			Ulu Remis	2011		Certified
			Bukit Badak	2011		Certified
			Cenas	2011		Certified
25	Hadapan SOU 24	2011	CEP Rengam	2011	Layang-layang, Johor	Certified
			Kulai	2011		Certified
			Layang	2011		Certified
			Seri Pulai	2011		Certified



26	Sandakan Bay SOU 26	2008	Tun Tan Siew Sin	2008	Sandakan, Sabah	Certified
			Tunku	2008		Certified
			Tigowis	2008		Certified
			Sentosa	2008		Certified
			Saguliud	2008		Certified
27	Melalap SOU 27	2011	Melalap	2011	Tenom, Sabah	Certified
			Sapong	2011		Certified
28	Binuang SOU 28	2009	Tingkayu	2009	Kunak, Sabah	Certified
			Sungang	2009		Certified
			Jelata Bumi	2009		Certified
			Binuang	2009		Certified
29	Giram SOU 29	2009	Mostyn	2009	Kunak, Sabah	Certified
			Giram	2009		Certified
30	Merotai SOU 30	2009	Imam	2009	Tawau, Sabah	Certified
			Merotai	2009		Certified
			Table	2009		Certified
			Tiger	2009		Certified
31	Lavang SOU 31	2011	Belian	2011	Bintulu, Serawak	Certified
			Kelida	2011		Certified
			Lavang	2011		Certified
			Lavang (SE)	2011		Certified
			Rasan	2011		Certified
			Chartquest	2011		Certified
			Dulang	2011		Certified
			Peroh	2011		Certified
			Pekaka	2011		Certified
			Ruai	2011		Certified
32	Rajawali SOU 32	2011	Rajawali	2011	Bintulu, Serawak	Certified
			Samudera	2011		Certified
			Semarak	2011		Certified
			Bayu	2011		Certified
33	Derawan SOU 33	2011	Takau	2011	Bintulu, Serawak	Certified
			Damai	2011		Certified
			Derawan	2011		Certified
			Sahua	2011		Certified
	LIBERIA					
1	Grand Cape Mount	2018	Matambo	2018	Grand Cape Mount, Liberia	IC
			Grand Cape Mount	2018		IC

			Zodua	2018		IC
			Bomi	2018	Bomi, Liberia	IC
			Lofa	2018		IC
	<b>P &amp; G</b> <b>(New Britain Palm Oil)</b>					
1	Poliamba	2012	Kara	2012	Kevieng, New Ireland Province, P&G	Certified
			West Coast	2012		Certified
			Nalik	2012		Certified
			Noatsi	2012		Certified
			Madak	2012		Certified
			North (Smallholders)	2012		Certified
			South (Smallholders)	2012		Certified
			West (Smallholders)	2012		Certified
2	Tetere	2011	Tetere	2011	Gudaicanal, Slomon Island	Certified
			Ngalimbiu	2011		Certified
			Mbalisuna	2011		Certified
			West Zone (Smallholders)	2011		Certified
			Central Zone (Smallholders)	2011		Certified
			MBA East (Smallholders)	2011		Certified
			MBA West (Smallholders)	2011		Certified
3	Sangara, Sambiripa & Mamba	2013	Sangara	2013	Higaturu, Popondetta, Oro, P&G	Certified
			Sumberipa	2013		Certified
			Ambogo	2013		Certified
			Embi	2013		Certified
			Mamba	2013		Certified
			Sorovi (smallholders)	2013		Certified
			Igora (smallholders)	2013		Certified
			Saiho (smallholders)	2013		Certified
			Aeka (smallholders)	2013		Certified
			Ilimo (smallholders)	2013		Certified
4	Gusap	2010	Dumpu	2010	Madang, P&G	Certified
			Surinam	2010		Certified
			Jephcott	2010		Certified
			Gusap	2010		Certified
			Paddox	2010		Certified
			Ngaru	2010		Certified
			Madang VOP (smallholders)	2010		Certified
			Morobe VOP	2010		Certified

			(smallholders)			
5	Hagita	2013	Giligili	2013	Milne Bay, P&G	Certified
			Hagita	2013		Certified
			Waigani	2013		Certified
			Sagarai	2013		Certified
			Padipadi	2013		Certified
			Mariawatte	2013		Certified
			East Gurney	2013		Certified
			West Gurney	2013		Certified
			East Sagarai	2013		Certified
			West Sagarai	2013		Certified
6	Mosa Kumbango Kapiura Namumdo Waraston	2008	Bebere	2008	West New Britain	Certified
			Kumbango	2008		Certified
			Togulo	2008		Certified
			Dami	2008		Certified
			Waisisi	2008		Certified
			Kautu	2008		Certified
			Karaus	2008		Certified
			Moroa	2008		Certified
			Bilomi	2008		Certified
			Loata	2008		Certified
			Haella	2008		Certified
			Garu	2008		Certified
			Daliavu	2008		Certified
			Sapuri	2008		Certified
			Malilimi	2008		Certified
			Rigula	2008		Certified
			Nomundo	2008		Certified
			Navarai / Karato ME	2008		Certified
			Volupai . Lotomgam / Natupi / Goruru	2008		Certified
			Lolokoru	2008		Certified
			Silovoti	2008		Certified
			LSS Hoskin (1,877 Smallholders)	2008		Certified
			VOP East (1,815 Smallholders)	2008		Certified
			VOP Central (1,958 Smallholders)	2008		Certified
			VOP West (1,277 Smallholders)Kaulong / Akamie / Pusiki /	2008		Certified

		Repamira / Sakapei / KDC ME (21 large smallholders)		
		LSS Kapiura (847 Smallholders)	2008	Certified
		VOP Kapiura (551 Smallholders)	2008	Certified
	<p>Sime Darby has achieved 34 management units in Malaysia, 25 management units in Indonesia, 10 management units in P&amp;G that RSPO certified. Total management unit in Sime Darby Plantation Bhd are 34 in Malaysia, 25 in Indonesia and 10 in P&amp;G. In the year of 2016 &amp; 2017 there are three Mill that are no longer operating, and for the supplying base (Estate) is diverted to a mill that is still operating and has been certified RSPO. The mills are:</p> <ol style="list-style-type: none"> <li>1. Angsana Mini Mill, PT Sajang Heulang: Mill stop operate since 2016 and the supply bases is transfer to Angsana POM, PT Ladangrumpun Subur Abadi.</li> <li>2. Selabak Mill, PT Swadaya Andhika: Mill stop operate since 2017 and the supply bases is transfer to Rantau POM, PT Laguna Mandiri</li> <li>3. Pekaka, SOU 34: Mill stop operate since 2017 and the supply bases is transfer to Lavang, SOU 31</li> </ol> <p>A new mill will be set up in Liberia and planned for commissioning in February 2016. Preparation to undergo the RSPO Certification process is in progress and Sime Darby Plantation Bhd targets to undergo RSPO Certification by end 2017. RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed on 2018.</p> <p>There was change of the Time Bound Plan under Sime Darby on July 2019 cause the Sime Darby postpone the others certification process. Change of the Time Bound Plan explanation: PT Mitra Austral Sejahtera, the properties was sold and currently Sime Darby Plantation Bhd have no control in the management.</p>			
1.10.2	<b>Progress of Associated Smallholders and Outrowers for Certifiable Standard</b>			
	The part area of associated smallholder (KKPA Sungai Cengal under PT LMI) which supplied to Rantau POM has been certified under PT LMI-Rantau POM.			

<b>2.0</b>	<b>ASSESSMENT PROCESS</b>
<b>2.1</b>	<b>Assessment Team</b>
<b>ASA-1.1.</b>	<p>1. <b>Trismadi Nurbayuto (Lead Auditor)</b>. 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. In this audit activity performs the assessment of worker welfare environmental, conservation and waste management.</p> <p>2. <b>Brigitta Prita (Auditor)</b>. 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, Training Lead Auditor RSPO by Daemeter and Proforest on July 2017; Training SA 8000 by Internal Company; Training Lead Auditor SCCS by BM Trada on June 2018; and Training social &amp; worker welfare from RSPO on January 2019. She has been audited experience ISPO &amp; RSPO since April 2013 in the environmental, conservation, waste management and worker welfare aspects. In this audit activity performs the assessment of legalities and Supply Chain.</p> <p>3. <b>Yudhi Yuniarto Tallutondok (Auditor)</b>. Indonesian citizen, Bachelor of Fisheries, Padjadjaran University. Have experience of working over three years since 2013 as plantation operations staff in private palm oil plantation companies in Indonesia. Training have been followed including Auditor of Indonesian Sustainable Palm Oil (ISPO), Lead Auditor of Roundtable on Sustainable Palm Oil (RSPO) P&amp;C, Lead Auditor of ISO 9001:2015, ISO 14001:2015, ISO 22000:2009, ISO 19011:2011, Social Accountability 8000, Basic Management Development Program Agronomy, Fire Anticipation on Land and Forest, Potential Mapping and Conflict Resolution in Production Forests, Awareness ISO 17021 and ISO 17065. Has participated in audit activities for the ISPO and RSPO scheme since 2017 for agronomy, OHS, labor, social and legality aspects. In this audit activity performs the best management practice, long-term business plan and OHS.</p> <p>4. <b>Nurdin Chaeriana (Observer)</b>. Indonesian Citizen. Diploma of Forest Management , Faculty of Forestry, has 5 years working experience in Industrial Plantation Forest Companies as Environment, Health and Safety staff and worked for 5 years in plantations as Assistant Manager of Sustainability. Training attended was ISPO Auditors, General OHS Expert, Hazardous and toxic waste material Management Technical Guidance, Fundamentals of Forest and Land Fire Control, Training of Trainer Fire Fighting Course, Basic Fire Fighting Course, Fire Management, Fire Fighting Technique Prevention &amp; Control, ISO 14001:2004 Internal Auditor. During this audit, he role as Observer.</p>
<b>2.2</b>	<b>Assessment Methodology, Assessment Process and Locations of Assessment</b>
<b>2.2.1</b>	<b>Figure of person days to implement assessment</b>
<b>ASA-1.1.</b>	<p>Number of auditors: 3 auditors.</p> <p>Number of days for <b>ASA-1.1</b> at site: 4 days.</p> <p>Number of working days for <b>ASA-1.1</b> at site: 12 Working days.</p>
<b>2.2.2</b>	<b>Assessment Process</b>
<b>ASA-1.1.</b>	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Laguna Mandiri to the requirements of <b>Principles and Criteria for the Production of Sustainable Palm Oil 2018, endorsed by the RSPO Board of Governors and adopted at the 15<sup>th</sup> Annual General Assembly by RSPO Member on 15 November 2018 and RSPO Certification System for Principles and Criteria, 14 June 2017.</b></p> <p>The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or</p>

substances from required documents; (2) *interview*, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site.

Some opportunities for improvement of the results ASA 1.1 delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase (ASA-1.2).

Improvement of findings from main assesment findings were observed by auditors at this ASA-1.1. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA 1.1.

Certified holder informs to CB through letter No. 012/AL/VIII/2019 dated 13 August 2019 regarding application for a change in the supply chain model of PT Laguna Mandiri - Betung POM. The letter stated that due to the purchase of uncertified FFB from Independent Smallholders as of August 2019, the Betung POM supply chain model that was previously IP was changed to MB. The results of the auditor verification found that Betung POM began receiving uncertified FFB as of August 2019.

The assessment program please find Appendix 2.

2.2.3	Locations of Assessment
ASA-1.1.	<p><b>Sekayu Estate</b></p> <ul style="list-style-type: none"> <li>• <b>Control Well (LA block), Block H35, Division 2.</b> Observation and interview with operator related to safety aspect and job description. And also observe about land application process.</li> <li>• <b>Control Well (Housing area).</b> Observation and interview with officer related to safety aspect.</li> <li>• <b>Land fill, Block G29, Division 2.</b> Observation related to domestic waste management.</li> <li>• <b>HGU pole number LMI 16, Block G19, Division 3.</b> Observation related HGU pole maintenance, adjacent with Bepara Village.</li> <li>• <b>HGU pole number LMI 23, Block J7, Division 4.</b> Observation related HGU pole maintenance, adjacent with Bepara Village.</li> <li>• <b>HGU pole number LMI 24, Block J7, Division 4.</b> Observation related HGU pole maintenance, adjacent with Bepara Village.</li> <li>• <b>Blok G28/G29.</b> Observation related to the Sekayu River riparian area</li> <li>• <b>Blok E08.</b> Observation related to the Kulum River riparian area</li> <li>• <b>Fertilizer storage.</b> Observation and interview related management of fertilizer.</li> <li>• <b>Chemical storage.</b> Observation and interview related management of chemical.</li> <li>• <b>Lubricants storage.</b> Observation and interview related management of lubricants.</li> <li>• <b>Clinic of Sekayu Estate Division 1.</b> Observation and interview related medical waste, work accident data and others.</li> <li>• <b>Daycare Division 2 SYE.</b> Observation and interviews related to employee welfare facilities, employment and domestic waste management.</li> <li>• <b>Fire Fighter Warehouse.</b> To observe completeness and readiness of fire fighter equipment.</li> <li>• <b>Sack storage.</b> Observation related management of sack.</li> <li>• <b>Fuel tank.</b> Observation related to implementation of OHS.</li> <li>• <b>Block Spraying System Division 2 SYE.</b></li> <li>• <b>Housing area Division 2 SYE.</b> Observation of the availability of infrastructure such as employee housing facilities, water facilities, educational facilities, religious facilities, health facilities and sports facilities</li> <li>• <b>Circle Racking, Block F12. Division 3.</b> Observation and interview with worker about recruitment, promotion, mutation, worker status, salary, OHS implementation, and socialization of company policy.</li> <li>• <b>Harvesting, Block E13. Division 2.</b> Observation and interview with worker about recruitment, promotion, mutation, worker status, salary, OHS implementation, and socialization of company policy.</li> <li>• <b>Empty Bunch Application, Block C25. Division 1.</b> Observation and interview with worker about recruitment, promotion, mutation, worker status, salary, OHS implementation, and socialization of company policy.</li> </ul>

- **Manuring, Block E14. Division 3.** Observation and interview with worker about recruitment, promotion, mutation, worker status, salary, OHS implementation, and socialization of company policy.
- **FFB Transportation, Division 3.** Observation and interview with worker about recruitment, promotion, mutation, worker status, salary, OHS implementation, and socialization of company policy.

#### Betung Estate

- **HGU pole number LMI 26, Block H38.** Observation related HGU pole maintenance.
- **HGU pole number LMI 08, Division 2.** Observation related HGU pole maintenance.
- **Blok B37.** Observation related to the Walen River riparian area
- **River Blok D35.** Observation related to the Sekayu River riparian area
- **Landfill Area Blok F36.** Observation related management of domestic waste.
- **EFB application on Blok C37.** Observation related EFB application
- **Spraying, Block D30.** Observation and interview with worker about recruitment, promotion, mutation, worker status, salary, OHS implementation, and socialization of company policy.
- **FFB Transportation.** Observation and interview with worker about recruitment, promotion, mutation, worker status, salary, OHS implementation, and socialization of company policy.
- **Manuring, Block H15.** Observation and interview with worker about recruitment, promotion, mutation, worker status, salary, OHS implementation, and socialization of company policy.
- **Harvesting, Block D38-39.** Observation and interview with worker about recruitment, promotion, mutation, worker status, salary, OHS implementation, and socialization of company policy.

#### Betung Factory

- **Water Treatment Plant.** Observation and interview with operator related to work instruction and job description, and also PPE's providing.
- **Hazardous Waste Store.** Observation and interview with officer related to safety aspect.
- **Lubricant Store.** Observation and interview with officer related to safety aspect.
- **Store Central.** Observation and interview with officer related to safety aspect.
- **Diesel Tank with Capacity 27,000 liter.** Observation and interview with officer related to safety aspect.
- **EFB station.** Observation and interview with officer related to safety aspect.
- **Effluent Pond.** Observation and interview with officer related to safety aspect.
- **Security Post (2 workers).** Observation and interview related job desk, OHS, worker welfare and others.
- **Loading Ramp Station (4 workers).** Observation and interview related job desk, OHS, worker welfare and others.
- **Weigh bridges station (1 clerk).** Observation and interview related FFB reception, SCC, and others.
- **Sterilizer Station.** Observation and interview with personnel related to FFB's processing into CPO, capacity each station, personnel understanding over the applicable SOP, fire emergency response facilities and infrastructure in mill, liquid waste management, first aid kits, the implementation of occupational health and safety, company's facilities, trainings from company and worker welfare.
- **Engine room.** Observation and interview with the worker related to implementation of OHS, understanding of safe working, administration of fossil fuels use.
- **Workshop.** Observation and interviews with employees related to management of hazardous waste and hazardous material, training, provision of PPE, training, emergency response facilities
- **Boiler Station.** Observation and interviews with employees related to management of hazardous waste and hazardous material, training, provision of PPE, training, emergency response facilities
- **Hydrant Simulation.** Observation on OHS condition and it management.

#### Tuesday 10 March 2020.

- Interview with Betung Village Community Leaders. Interviews related to the issue of environmental pollution, fire issue, land conflict issue, the company's contribution to society and the impact of corporate activities.

#### Wednesday, 11 March 2020.



	<ul style="list-style-type: none"> <li>Interview with 1 person head of gender committee and 2 persons of local contractor (Stone Activity &amp; loose fruit picker).</li> <li>Interview with Sekayu Baru. Interviews related to the issue of environmental pollution, fire issue, land conflict issue, the company's contribution to society and the impact of corporate activities.</li> </ul>
<b>2.3</b>	<b>Stakeholder Consultation and Stakeholders Contacted</b>
<b>2.3.1</b>	<b>Summary of stakeholder consultation process.</b>
<b>ASA-1.1.</b>	<p>Summary of stakeholder consultation process</p> <p>Consultation of stakeholders for PT Laguna Mandiri was held by:</p> <ul style="list-style-type: none"> <li>Public announcement at web <a href="http://www.mutucertification.com">www.mutucertification.com</a> on 24<sup>th</sup> February 2020.</li> <li>Public consultation with government of Kotabaru Regency conducted by phone on 10<sup>th</sup> March 2020</li> <li>Public consultation meeting with local stakeholder conducted by interview on 10<sup>th</sup> – 11<sup>th</sup> March 2020</li> <li>Public consultation meeting with internal stakeholder on 10<sup>th</sup> March 2020</li> <li>Public consultation with NGO by email conducted on 03<sup>rd</sup> March 2020</li> </ul> <p>Numbers of input from stakeholders were clarified by Bhumireksa Nusasejati.</p>
<b>2.3.2</b>	<b>Stakeholder contacted</b>
	Please find appendix 1
<b>2.4</b>	<b>Determining Next Assessment</b>
	The next visit ASA-1.2 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 Betung POM – PT LMI operation consisting of one (1) mill and two (2) oil palm estates.

During the assessment, there were three (3) Nonconformities were assigned against Critical Compliance Indicators, one (1) nonconformity was assigned against Non-critical Compliance Indicators *and* one (1) nonconformity against supply chain requirement for CPO mill and four (4) opportunities for improvement were identified.

Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5. The company has already prepared and implemented the corrective actions that had been reviewed and accepted by Auditor(s) in form of documentation evidences. Those corrective actions taken that consist of three (3) Critical non-conformities and 1 nonconformity was against supply chain requirement for CPO mill

MUTUAGUNG LESTARI found that Betung Factory – PT LMI, subsidiary of Sime Darby Plantation Bhd 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 15<sup>th</sup> 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	
<b>PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY</b>		
<b>1.1</b>	<b>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.</b>	
<b>1.1.1 &amp; 1.1.2</b>	<p>List of publicly accessible document describes in SOP of request of information and response issued on 20 Jan 2015, consist of 29 documents which has been covering the documents listed in indicator 1.2's requirement. SOPs and accessible list of documents are informed through notice boards in the mill and estates office.</p> <p>All such documents and information are available in the respective offices of each unit, however the environmental documents kept in the Mill office and permit documents are kept in the PSD office.</p> <p>Based on interviews with local communities, local contractors and internal stakeholder, it is known that the company has carried out socialization related procedures for requesting information and has determined the person responsible for responding to information requests. Each party also knows the types of general information that can be accessed. Further explained that public documents that can be accessed are specific documents from each operational unit.</p>	
<b>1.1.3.</b>	<p>The Certification Unit has information request procedure revised 02 dated 20 January 2015. information can be accessed through verbal (by phone), direct visit and writing (email and letter). Adm Head in the respective unit is responsible to verify the request and forward to the intended person (EM/DEPT/DIV). The requests of information that requiring head of department approval will be responded to a maximum of 1 month, otherwise approval will be required for a maximum of 1 week.</p>	

The entire request of information (verbal and written) is recorded and kept in the logbook which is available in all units both of estates and mill, there was no request for information, but recorded several incoming letters which were entirely the proposals of aid that has been responded by the certification unit.

**1.1.4.**

The Certification unit has communication procedure number 10/LMI-B/SOP/K/2017 revised 01, dated 12 July 2017. It's includes all internal & external communication activities related EHS & RSPO. The PSD or Manager was responsible for gathering information, receiving and inviting invitations and communication, holding meetings and communication with outside agencies. This procedure has socialized to the workers and contractors dated 1 December 2019 and 11 February 2020. Based on interview with surrounding villages sighted that the certification unit has socialized thus procedure.

**1.1.5**

Based on document verification sighted that the certification unit has stakeholders list from the village level, district level, regency level, province level and national level. Each of stakeholders were completed with contact number informations.

**Status: Comply**

**1.2**

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

**1.2.1.**

Code of conduct describes in document no.: 440/HRM-COC/07 written in Bahasa, including integrity code and ethical code in all operations and transactions including business ethics, work ethics and firm commitment in particular matters (conflict of interests, political activities, gifts / souvenirs, commissions and bribery prohibitions. These commitment has been listed in the contract letter of supplier/contractor and has been informed to workers during morning roll-call. The certification unit has socialized it on 1 December 2019 and 11 February 2020. Based on interviews with local contractors told that the job offer was fair and there was no indication of bribery and other conflicting practices

**1.2.2.**

The Certification unit has a system to monitor compliance and implementing a code of conduct policy by regularly outreach on the morning call. In addition, that the company also has internal audit team to monitor this system is running. Based on interview with several estates' worker sighted that the certification unit has conduct that.

**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 & 2.1.2.**

Procedure of laws and regulations pursuance was showed in document procedure No. 724/TQEM-SPMS/09 related guideline of sustainable plantation management and No. 701/TQEM-ESH/10 dated March 6<sup>th</sup> 2012 about legal requirements of PT LMI. The former procedure in Chapter 12 has mentioned that pursuance of government laws and regulations shall be monitored while the latter has mentioned that laws and regulations pursuance should be identified by Department of PSQM-ESH. Moreover, procedure No. 031/LMI-2011.PUUP-021/2011 dated March 2012 mentioned that all laws and regulations should be evaluate and update quarterly by Legal team, in coordination with PSD and PSQM Department. The regulatory type information is updated annually by PSQM officers and authorized by the Estate Manager.

**Environment Aspect**

PT LMI (Betung and Sekayu Estate) has the environment impact analysis document which covers the environment impact analysis (AMDAL) document, environment management plan document and environment monitoring plan document for study scope such as:

- Estate areas: company has environment impact assessment document which approved by the Agribusiness Board of Department of Agriculture through approval letter No. 008/ANDAL/BA/II/1995 dated February 27<sup>th</sup> 1995. The EIA has carried out by PT Anima Rekayasa Perkasa. Maximum capacity of mill is 60 ton FFB/hours.

- Betung Factory: Betung Factory is a second mill in PT LMI and has the environment impact assessment document (ANDAL, RKL & RPL) that had approved by the peer review committee and technical team of environment impact assessment/environment management plan and environment monitoring plan in Kotabaru District No. 660/22/BLHD-AMDAL on August 20<sup>th</sup> 2010. The document has carried out by Faculty of Forestry, Lambung Mangkurat University in Kalimantan Selatan. Scope of assessment was 20 ha area with capacity of 60 ton FFB/hours. Approval of the assessment is presented in approval letter of Kotabaru District No.188.45/293/KUM/2010.

#### **Legality Aspects.**

##### **Land Use Title**

The company has had the land rights in the form of Land Use Title (HGU) for an area of 15,300 hectares which consist of 10 certificates.

##### **Plantation Business Permit**

The company has an IUP according to Kotabaru Regent Decree No. 188.45 / 390 / KUM / 2009 dated October 15, 2009 with an area of 15,300 ha and a plant capacity of 60 tons of FFB / hour. The area of HGU & IUP covers the Rantau, Matalok, Sekayu and Betung plantation areas. For the scope of this certificate (PKS Betung) only covers 2 Estate namely Sekayu Estate and Betung Estate with a total area of 7,580.

##### **2.1.3.**

The company shows Boundary stones management plan for period 2020, Official report on inventory and maintenance of HGU Boundary stones on February 26, 2020, which informs the number of boundary stones, location, information, photos and conditions. For example there are 40 boundary stones consisting of 3 damaged; 19 blurred paint colors; 4 displaced by community land clearing and others. Available documents on the realization of maintenance and painting of boundary stones at BTE in February 2019. The maintenance, cleaning & painting program of HGU boundary stones were carried out in February & August 2019. The treatment plan boundary stones was conducted in February and August 2020 (1 year 2 times).

Based on field visit at HGU pole number LMI 26, Block H38 and HGU pole number LMI 08, Division 2. The HGU pole in good condition and in accordance with the Land National Agency markers.

**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.**

The company shows a list of contractors for FFB suppliers such as:

No.	Company name	Contract number	Address	Phone number
1.	<i>Badan Usaha Milik Desa Sumber Makmur</i>	002/TBS/LMI-Bumdes Mulyoharjo/VIII/2019 Tanggal 1 Agustus 2019	Merak Road, Mulyoharjo Village, Sub-district of North Pamukan, District of Kotabaru, South Borneo.	Riyono
2.	<i>Badan Usaha Milik Desa Pondok Labu Jaya</i>	005/TBS/PSA-Bumdes Pondok Labu Jaya/XII/2019 Tanggal 2 Desember 2019	Merak Road, Pondok Labu Village, Sub-district of South Pamukan, District of Kotabaru, South Borneo.	Zainal Abidin 085246994346

##### **2.2.2.**

Available FFB sale and purchase agreement (*SPJB*) number 005 / TBS / PSA-Bumdes Pondok Labu Jaya / XII / 2019 dated December 2, 2019 between the company and *Badan Usaha Milik Desa Pondok Labu Jaya* signed by the First Party and the Second Party. The second party is willing to provide or exclude FFB originating from the plantations owned by the second

party covering an area of 75 ha to Betung Factory. In addition, this contract is also intended to comply with the provisions of Law No.39 of 2014 concerning plantations article 58 paragraph 1. Plantation companies having plantation business licenses or business permits for cultivation are required to facilitate the construction of community plantations around no less than 20% of the total area of plantations covered.

The company is considering monitoring the agreement between the contractor and its employees in accordance with applicable legal obligations (OFI).

### 2.2.3.

There is an FFB sale and purchase agreement (*SPJB*) number 002 / TBS / LMI-Bumdes Mulyoharjo / VII / 2019 on August 1, 2019 – August 1, 2024 between the company and *Badan Usaha Milik Desa Sumber Makmur* example respect human rights.

There is representative memorandum of understanding of *BUMDES* Mulyoharjo and *BUMDES* Pondok Labu dated March 6, 2020 which informed that the contractor agreed to be interviewed by the RSPO team and agreed to meet the principles and criteria applicable in the RSPO certificate system implemented by PT LMI and agreed to meet the RSG (Responsible sourcing Guidelines) while having a business license, implementing OHS, Respecting Human Rights, not employing minors (<18 years) and respecting each individual.

Non-critical  
2.2.2

Status: OFI.

### 2.3

All FFB supplies from outside the unit of certification are from legal sources.

#### 2.3.1 & 2.3.2.

The company shows a list of contractors for FFB suppliers such as:

No.	Company name	Contract number	Titik kordinat	Legality
1.	<i>Badan Usaha Milik Desa Sumber Makmur</i>	002/TBS/LMI-Bumdes Mulyoharjo/VIII/2019 Tanggal 1 Agustus 2019	-2.4610,116.4030 or 2°27'39' S and 116°24'10.8' E	Village Regulation No. 09 of 2017 concerning the establishment and management of <i>BUMDES</i> in Mulyoharjo Village, North Pamukan District, Kotabaru Regency on September 26, 2017.
2.	<i>Badan Usaha Milik Desa Pondok Labu Jaya</i>	005/TBS/PSA-Bumdes Pondok Labu Jaya/XII/2019 Tanggal 2 Desember 2019	-2.4227,116.5051 or 2°25'21.72' S and 116°30'18.36' E	Kotabaru Regency Notary Decree on behalf Retno Tri Wahyuni S.H., M.Kn number 342 / N-RTW / W / I / 2019 dated January 18, 2019.  Village regulation No.7 November 2017 regarding the establishment and management of <i>BUMDES</i> in Pondok Labu Village was approved by Pondok Labu of Village Head.

All FFB received directly from *BUMDES* Mulyoharjo and *BUMDES* Pondok Labu.

	<b>Status: Comply</b>
<b>PRINCIPLE #3 OPTIMISE PRODUCTIVITY, EFFICIENCY, POSITIVE IMPACTS AND RESILIENCE</b>	
<b>3.1</b>	
<b>There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.</b>	
<b>3.1.1</b>	
<p>The CH has a work plan for the next 5 years in the 2016-2021 Budget document &amp; Projection which are made per unit of management. In the document has explained that the operational area plan has not changed, the production of TBS, CPO and PK, yield / ha, the projected extraction of CPO &amp; PK, the cost for ESH, social and environmental management and operations.</p> <p>In addition, the CH has Data of PT. LMI Business Plan period 2020 - 2024 which describes the number of seeds, FFB production, OER, Production Cost, price of CPO, Revenue, replanting and CPO Production. The CH has conducted an evaluation of the estimated budget which is conducted every month. Evaluation is recorded in Performance Monitoring documents. In the document explaining that the difference between realization activities and budget as well as to explain the evaluation of these differences.</p>	
<b>3.1.2</b>	
<p>The CH has an annual replanting program by showing the Replanting Program Plan document for 2016 - 2032 in the Long Range Replanting document. The CH has conducted an evaluation for the 2019 period and known that replanting has not been done in 2019 in accordance with the plans that have been prepared previously. Based on interviews with management, known that replanting has not been carried out due to consideration of the still high production for the planting year to be replanted.</p>	
<b>3.1.3</b>	
<p>The CH has a procedure related to internal control described in the Sustainable Plantation Management Guideline number 724/TQEM-SPMS/09 which was ratified on August 27, 2010. The procedure describes the internal audit, external audit, management evaluation, evaluation level, evaluation response and evaluation revised procedure. Officers who carry out audit and evaluation have competencies as expected by the CH.</p> <p>The CH shows the document of the results of the internal audit semester II 2019 listed in the Conclusion Examination Worksheet. The internal audit was carried out on 2 - 6 January 2020 which included several things including:</p> <ul style="list-style-type: none"> <li>• Cash and bank including payroll.</li> <li>• Stores and purchases.</li> <li>• Upkeep and manuring.</li> <li>• Crop and produce.</li> <li>• Environmental, safety and health.</li> </ul>	
	<b>Status: Comply</b>
<b>3.2</b>	
<b>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.</b>	
<b>3.2.1</b>	
<p>The company presented RSPO PT LMI internal audit documents - Betung Factory, dated 02 s.d. January 6, 2020, with the findings of 10</p> <ol style="list-style-type: none"> <li>1. Indicator 1.1.3 lists external letters and sample letters, this has been fulfilled on January 15, 2020 with the PIC section head</li> <li>2. Indicator 6.7.1 of the P2K3 program has been fulfilled on January 15, 2020 with the PIC Assistant Division</li> <li>3. Indicator 7.8.2 HCV monitoring has been fulfilled on January 15, 2020 with the PIC Assistant Division</li> <li>4. Indicator 7.10.1, the GHG 2019 calculation has been fulfilled on February 16, 2020 with the PIC Assistant Division</li> </ol>	
<b>3.2.2</b>	



Until this audit was conducted, there has been no determination from the RSPO regarding this metric template.

Status: Comply

### 3.3

**Operating procedures are appropriately documented, consistently implemented and monitored.**

#### 3.3.1 and 3.3.2

The CH has plantation operational procedures from land clearing to FFB harvesting listed in the Agronomy Manual with number 110/EST-ARM/13 dated September 1, 2013. In addition, The CH also has mill operational procedures from the process of receiving FFB to palm oil and kernel storing listed in the palm oil mill technical guidelines dated 30 April 2007. The procedure was signed by the Head of Plantation Upstream Indonesia Minamas and was distributed on September 16, 2013 to all Division Heads/Department Heads and all heads of plantation and mill units.

The CH also has a system to ensure consistency regarding the implementation of the procedures listed in the Sustainable Plantation Management Guideline with document number 724/TQEM-SPMS/09 dated August 27, 2010. The procedures explained regarding the implementation of internal audit, external audit, management evaluation, evaluation level, evaluation responses and revised procedures. Officers who carry out audit and evaluation have competencies as expected by the CH. It was further explained that the CH has a copy of the procedures available at each unit office and documented in Indonesian.

The certificate holder has FFB suppliers, namely: *Badan Usaha Milik Desa Sumber Makmur* and *Badan Usaha Milik Desa Pondok Labu Jaya*. Internal control conducted by the certificate holder by sorting FFB each supplier. The certificate holder will conduct an evaluation with FFB suppliers related to FFB quality at the end of each month.

Based on interviews with estate and mill workers found that workers could explain the workflows that were determined according to CH procedures. It was further explained that procedures related to operations in general had been disseminated to all workers in accordance with their respective fields of work. Based on field observations in the estate for harvesting and spraying activities were found that workers could demonstrate work methods in accordance with procedures. Meanwhile, mill employees such as WTP operators can explain their duties and responsibilities in accordance with work procedures.

#### 3.3.3

The CH has a procedure related to internal control described in the Sustainable Plantation Management Guideline number 724/TQEM-SPMS/09 which was ratified on August 27, 2010. The procedure describes the internal audit, external audit, management evaluation, evaluation level, evaluation response and evaluation revised procedure. Officers who carry out audit and evaluation have competencies as expected by the CH.

The CH shows the document of the results of the internal audit semester II 2019 listed in the Conclusion Examination Worksheet. The internal audit was carried out on 2 - 6 January 2020 which included several things including:

- Cash and bank including payroll.
- Stores and purchases.
- Upkeep and manuring.
- Crop and produce.
- Environmental, safety and health.

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

PT LMI (Betung Estate and Sekayu Estate) already has an Environmental Impact Analysis document consisting of:

- a. Betung Estate and Sekayu Estate ; already has an Environmental Impact Analysis Document (ANDAL) that has been approved by the Agribusiness Agency, Ministry of Agriculture through approval letter No. 008 / ANDAL / BA / II / 1995, dated 27 February 1995, compiled by PT. ANIMA REKAYASA PERKASA, Jakarta. For the location of PT. Laguna Mandiri, PT. Langgeng Muara makmur, PT. Paripurna Swakarsa and PT. Swadaya Andikap. While the maximum capacity of each plant is 60 tons of FFB / hour. The scope of PT LMI is 21,400 ha.



In the document, there is a RKL-RPL matrix explaining management plans and monitoring the environment for plantations at PT Laguna Mandiri and PT Langgeng Muara Makmur and Palm Oil Mill at PT PSA, Laguna Mandiri, Langgeng Muara Makmur and Swadaya Andika. From the results of the AMDAL Document Analysis, the main issues at PT LMI are explained, including:

- Decreased water quality of river sengkok
- Erosion and loss of soil quality
- Wildlife disturbance and loss of protected flora
- Social unrest.

- b. Betung POM; already have an AMDAL document in accordance with the Kotabaru Regent's Approval Letter No. 188.45 / 293 / KUM / 2010 concerning Environmental Feasibility of Palm Oil Processing Plant Development Activities in Pamukan Utara District, Kotabaru Regency, South Kalimantan Province by PT. LAGUNA MANDIRI. From the results of the AMDAL Document Analysis, identifying important impacts are as follows:

- Socialization
- Land acquisition and acquisition
- Employment
- Cleaning of factory land
- Factory construction
- Harvesting
- Transportation
- Processing of yields
- Waste Management
- Manpower Handling
- Security and public order
- Public health

Verification results of the semester 1 of 2019 RKL-RPL Implementation Report, it is known that the company has carried out environmental management and monitoring in accordance with the matrix in the AMDAL document, including evaluation of management and monitoring activities that have been carried out. In addition, the company has carried out several tests such as surface water quality testing, testing the quality of wastewater, noise, odor, vibration, air quality and ambient, increasing the impact of employment and increasing the income of the community and employees. The results of management and monitoring have been included in the RKL-RPL Implementation Report which is submitted every semester to the competent authorities. For semester 1 of 2019, the company has reported on September 6, 2019 to the Kota Baru Regency Environmental Agency (letter number: 132 / LMI-BTF / DLH / 09/2019).

The company has a social impact assessment document for the scope of PT LMI which was carried out in 2010 by YASBI (Indonesian Sustainable Palm Oil Foundation). The social impact assessment addresses the livelihoods of the population, educational facilities, the economy (the economy of the local community, opening up opportunities to become partners with companies), social and cultural aspects of the community, etc.

The company has monitored social impacts on 30 April 2018 by making a questionnaire to the communities surrounding the company and KKPA. Other villages that were surveyed were Sekayu Village, Bepara Village and Betung Village. Aspects surveyed in the questionnaire:

1. Public opinion about the company's existence.
2. Community opinion is carried out by KKPA in the Village
3. Livelihoods before and after the existence of plantations
4. Changes in income before and after the company
5. Community views on the continuation of plantations and KKPA
6. Increasing employment and increasing wholesale work

The following survey results include:

From a survey conducted 48.78% of respondents cited the opinion that the existence of plantations and KKPA really helped the economy and the welfare of the community, and 48.78% stated it was quite helpful in improving the economy and welfare of the community, while as many as 2.44% thought they were less helpful.

Regarding the livelihoods of the surrounding communities before and after the company, according to the survey results, there was a positive impact. Previously, the land farmers themselves when there was a company and the KKPA program could work in the company and in the KKPA Unit.

From sharing monitoring of environmental and social impacts at PT LMI and KKPA plantations, that for social and economic conditions the community has a positive impact, especially in increasing employment, increasing community income and increasing business opportunities in the surrounding communities This Social Impact Monitoring was carried out on 30 April 2018. Based on the results of interviews with company staff, monitoring will be carried out again in 2020. The company conducted a review of the management and monitoring of social impacts in January 2020 by involving workers, Betung Village, Sekayu Village and Balaimea Village. The company has also shown an evaluation of the social management and monitoring program in 2020. And based on interviews with company staff that this program will be reviewed in January 2021. In accordance with the results of a public consultation with Sekayu Baru village, the village head expressed the hope that the company would pay attention to the existence of a hornbill beetle attack if replanting was carried out, fearing that the pest could attack community plantation. In this case, the company will carry out a CECT if indeed it will be replanting, so that it can avoid the attack of the horn beetle pest.

### 3.4.2

Based on the AMDAL document, the impacts that must be managed and monitored are:

AMDAL 1995	AMDAL 2010
1. Air Quality,	1. Microclimate,
2. Soil Physical and Chemical Properties,	2. Air Quality,
3. Erosion and Sedimentation,	3. Noise,
4. Hydrology / Flooding,	4. Spatial and Land,
5. Factory Waste (Liquid),	5. Land,
6. Vegetation and Wildlife Protected,	6. Hydrology,
7. Public unrest,	7. Water Quality,
8. Job Opportunities,	8. Social Economy,
9. Community and Employee Income	9. Community Perception,
10. Farming Business Patterns	10. Security and public order and
	11. Public Health

Verification results of the semester 1 of 2019 RKL-RPL Implementation Report, it is known that the company has carried out environmental management and monitoring in accordance with the matrix in the AMDAL document, including evaluation of management and monitoring activities that have been carried out. In addition, the company has carried out several tests such as surface water quality testing, testing the quality of wastewater, noise, odor, vibration, air quality and ambient, increasing the impact of employment and increasing the income of the community and employees. The results of management and monitoring have been included in the RKL-RPL Implementation Report which is submitted every semester to the competent authorities. For semester 1 of 2019, the company has reported on September 6, 2019 to the Kota Baru Regency Environmental Agency (letter number: 132 / LMI-BTF / DLH / 09/2019).

The company has a social impact assessment document for the scope of PT LMI which was carried out in 2010 by YASBI (Indonesian Sustainable Palm Oil Foundation). The social impact assessment addresses the livelihoods of the population, educational facilities, the economy (the economy of the local community, opening up opportunities to become partners with companies), social and cultural aspects of the community, etc.

The company has monitored social impacts on 30 April 2018 by making a questionnaire to the communities surrounding the company and KKPA. The villages surveyed included Sekayu Village, Bepara Village and Betung Village. Based on interviews with company staff, monitoring will be carried out again in 2020.

### 3.4.3

The company shows a report on the implementation of RKL / RPL Semester I Year 2019 with the parameters monitored, including:

- Microclimate,
- Air quality,
- noise,
- Spatial Planning and Land,
- Soil,
- Hydrology,
- Water quality,
- Social Economy,
- Community perception,
- Security and public order and
- Public health

But there is no trend evaluation, critical level evaluation, and compliance level evaluation.

Based on the description above, the Company has not been able to show that the evaluation and preparation of the RKL / RPL implementation report is in accordance with KepMenLH No. 45 of 2005. **It was raised as nonconformity number 2020.01.**

**Critical  
3.4.3**

**Status: Non conformity No 2020.01**

### 3.5

**A system for managing human resources is in place.**

#### 3.5.1

The Certification unit has employees recruitment procedure number SOP/RSPO PT LMI-IX.C.A.1 dated 28 January 2012 and temporary workers recruitment number SOP/SPO-PKWT/2016 dated 2 September 2016. There are several sample of temporary workers agreement, for example: agreement number 001/SPKWT-BTF/VI/2019 dated 1 July 2019 in Betung POM. There is termination case in Division 2, Sekayu Estate, it causes a harvester was steal of FFB's. Based on document verification sighted that the certification unit paid his rights in accordance to the national regulation.

#### 3.5.2.

During the audit activity, the following information were obtained:

1. Collective Labour Agreement (CLA) article 14 states that a specific time agreement worker (PKWT) can be carried out by the company for certain types of work performed in accordance to Manpower Minister regulation, and also make standardizes certain PKWT to be treated equally in the unit. Regarding this matter the company showing Inter-Office Mail number 085/RSPO-i2/XI/2016 dated 11 November 2016 and Inter-Office Mail number 017/HRM-i5/II/2019 dated 25 January 2019 about specific time agreement workers, explained that the use of PKWT is intended for harvester during the peak harvest season, and the appointment and extension of the PKWT contract refer to the applicable laws and regulations.
2. Based on document verification sighted that there are 59 PKWT in SYE, consisting 40 harvester, 3 harvesting clerk, and others workers.
3. Based on document verification sighted that there are 77 PKWT in BTE, consisting 12 pruning, 2 teacher, 6 upkeep, 6 manuring and others workers.
4. Agreement number 003/LMI/PKK-PKWT/IX/2019 between PT LMI (SYE) with E.T.D (harvester) period from 21 September 2019 until 17 September 2021.
5. Agreement number 021/BTE-EM/SPK/I/2020/PKWT between PT LMI (BTE) with S.S.T (harvester) period from 2 January 2020 until 30 June 2020.
6. Agreement number 013/SYE-PKWT/XI/2018 between PT LMI (SYE) with A.S.R (harvester) period from 14 November 2019 until 14 November 2020.

However, the certification unit has not been fully consistent in implementing the established human resources management procedures that the using of PKWT is intended for harvester during the peak harvest season, and the appointment and extension of the PKWT contract refer to the applicable laws and regulations. **It was raised as nonconformity number 2020.02.**

**Non  
Critical  
3.5.2**

**Status: Non conformity No 2020.02**

### **3.6**

**An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.**

#### **3.6.1**

The CH has showed the document of Hazard Identification, Risk Assessment and Control (HIRAC) for the period of January-December 2020. The HIRAC has covers all working activities on the mill and estates. The analysis has covers risk hazard identification, sources of hazard risk, frequency (routine, non-routine, emergency), potential risk identification (sources and impacts), control management, risk analysis of severity level and value level. Based on interview with management representatives known that the compliance of product application requirements presented in MSDS and HIRAC document. For example, based on field observation towards pesticide applicator at Sekayu dan Betung Estate, known that respirator used by applicators were in accordance with MSDS and HIRAC requirement.

#### **3.6.2**

The CH regularly (every month) holds an internal meeting of the OHS committee to discuss the implementation of OHS in the CH's operational areas as follows:

- Mill  
The OHS Committee meeting for the February 2020 period was held on February 10, 2020. The discussion included the socialization of the use of PPE, the socialization of LOTO, the socialization of employee facilities and infrastructure, the checking and refilling of fire extinguisher, the repair of lights and the installation of sirens as signs of emergency danger in the schedule waste storage.
- Estate  
The OHS Committee meeting for the February 2020 period was held on February 10, 2020. The discussion included the distribution of PPE that did not cover all employees, and the storage of work tools in residential areas that had not been stored safely.

**Status: Comply**

### **3.7**

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

#### **3.7.1**

1. The certification unit showing training program in SYE, BTE, and BTF year of 2019 and 2020. However the training program not identify about training need for grabber operator.
  2. Minute of handover of good with number 109/STB/PJT/XII/2019 from PT Bina Pertiwi concerning the delivery of Kubota Farm tractor MX5100/S3, Grabber and accessories on 19 January 2020.
  3. Based on field observation sighted that company has 7 unit tractor. Based on interview with operator sighted that 4 operator doesn't have OHS license.
  4. Letter number 01/ESH KSP-Training K3/II/2020 dated 10 February 2020 about submission of training for heavy equipment operators, generators, water machines for Kalimantan Selatan Pulau Laut (KSP) year of 2020. The document explains that there are 4 operators to be included in the training plan. The document has also been approved by Regional CEO KSP.
  5. The BTF shows the OHS program on 1 January 2019, including: PPE application, OHS meeting routines, check the cleanliness of the cottage & public facilities, and OHS simulation.
- However the certification unit has not been able to show evidence that the identification training needs comprehensive for all employees and operators. **It was raised as non conformity number 2020.03.**

#### **3.7.2.**

The certification unit has conducted training on each unit during last year, such as:

- Safe manuring on 11 February 2020.

- HCV training on 8 August 2019
- SCCS training on 4 June 2019
- Hazardous waste management training on 1 September 2019
- Safe harvesting on 21 January 2020.
- Fire drill on 8 September 2019.

The certification unit to be consider keeping the training recors for each employee. (Observations).

### 3.7.3.

Based on interview with Clerk of weighbridge, they have been training and socialization related SCC. Training was conducted every once a year to personel key.

**Critical**  
**3.7.1**

**Status: Non-Conformity number 2020.03**

## 3.8

### Supply Chain Requirements for Mills

#### 3.8.1

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

#### 3.8.2.

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

#### 3.8.3.

The Organization has estimated the amount of tonnage from FFB, CSPO & CSPK produced during the 12 months for the period March 2019 – February 2020 with details:

Item	License volume (Tonnes) April 1 <sup>st</sup> , 2019 – March 31 <sup>st</sup> 2020	Actual production for last year
FFB	89,969	66,162.03
CPO	18,893	13,946.24
PK	4,498	4,254.33

#### 3.8.4.

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

- Member Name: PT. Laguna Mandiri
- Member ID: RSPO\_PO100001380
- Membership of RSPO 1-0008-04-000-00
- Last license: CB87419

#### 3.8.5.

Betung Factory has RSPO SCCS Manual- RSPO Supply Chain Certification Standard No. 001/SCCS/I.2018 dated on 02 January 2018. The scope of RSPO Supply Chain System: FFB Certificate processing from raw material acceptance to storage and delivery process produces Certified Sustainable Palm Oil (CSPO) and CSPK.

Module Mass Balance.

#### 6.1 Processing.

Facilities can only use the same supply chain model as the supplier or go to a less strict system. Desclassification can only be done in the following order:

IP → Segregate → Mass Balance → Non RSPO certified.

#### 6.2 Record.

6.2.1 The facility will keep accurate, complete, up to date and accessible records & reports covering all aspects of the

requirements.

6.2.2 Retention times for all records and reports are at least 5 years.

6.2.3 The trade name must be used and specified in the relevant document. Product name / MB or mass balance. The supply chain model used must be clearly demonstrated.

### Mass Balance System

6.3.1. The facility must ensure that the RSPO physical balance in Mass Balance of input and output materials (volume or weight) on the physical site is monitored in real time.

6.3.2. The facility must ensure that the material accounting system complies with:

- Facilities that can only deliver mass balance rather than positive stock.
- Facilities are only allowed to sell for a short time.

6.3.3. RSPO data is valid from the first date recorded in the material accounting system.

6.3.4. All combined (Volume) derivative palm oil derivatives delivered are subtracted from the system acquisition material in accordance with the conversion ratio stated by the RSPO.

6.3.5. The facility can purchase how much is a separate palm oil (SG) sustainability and PK product and use it to match the volume sales of Palm oil derivative products sold under mass balance. Note: Separate palm products (SG) cannot be used to offset claims of mass balance of MB Palm Kernel Products or vice versa.

### 3.8.6.

Internal audit procedure has been included on procedure with number LMI-IA/BTF/OP/QESH/04 revision 00 date issued on 1 March 2018 approved by Pjs Mill Manager. Betung Factory was conducted Internal Audit SCC on February 12th, 2020. There are 6 non-conformance example: BTF has not have transaction data from marketing and there is no management review. Management review was conducted on February 1<sup>st</sup>, 2019 its contained point management review, finding, action plan, PIC and time schedule. Example: There is no transaction data in mill area, it will be asked to marketing (Jakarta) dated on February 28<sup>th</sup>, 2020.

### 3.8.7.

Production data for certified and non certified CPO & PK for the period March 2019 – February 2020 with details:

Months 2019- 2020	CPO Production (kg)			PK Production (kg)		
	Cert	Non-Cert	Total	Cert	Non-Cert	Total
March	431.557	0	431.557	381.897	0	381.897
April	590.005	0	590.005	379.456	0	379.456
May	691.329	0	691.329	347.787	0	347.787
June	674.832	0	674.832	330.118	0	330.118
July	1,003.21	0	1003.211	457.697	0	457.697
August	1,697.75	11.476	1709.223	385.143	2.51	387.653
Sept	1,665.52	32.738	1698.254	305.757	7.161	312.918
October	1,712.49	55.146	1767.639	345.425	12.063	357.488
November	2,125.77	86.489	2212.257	314.578	18.919	333.497
Dec	1,141.38	104.181	1245.557	326.811	22.79	349.601
Jan	1,169.34	28.067	1197.402	349.009	6.14	355.149
Feb	1,043.07	40.272	1083.343	330.652	8.81	339.462
<b>Total</b>	<b>13,946.24</b>	<b>358.37</b>	<b>14,304.61</b>	<b>4,254.33</b>	<b>78.39</b>	<b>4,332.72</b>

### 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. Example: Kernel delivery letter (*IKS*) is available, which informs: vehicle number, Transporter, Product, Driver name, Date, Time, Net weight 8,450 kg; Ticket number 015049 on December 28, 2019 stamped RSPO Mas Balance.



**3.8.9.**

- Transportation Services Agreement No. 019 / CPO / LMI CPF / CV. Kith Sithil / X / 2019 dated October 1, 2019 - March 31, 2020 between PT LMI and CV Karya Sithil for CPO transportation activities. This CLA was signed by the Acting BTF, AC Pamukan, CV Karya Sithil and verified by the OC KSP Region.
- Transportation Services Agreement No. 014 / Freight Services / LMI-Abdul Kadir / X / 2014 dated December 31, 2018 – May 31, 2020 between PT Laguna Mandiri and Abdul Kadir was signed by the Company Director and the Contractor.
- Storage, heating and pumping service agreements at Bulking Station under number 007 / Storage Services / SAA-LMI / VI / 2017 (addendum 1) dated June 28, 2019 – June 30, 2021 between PT Swadaya Andika and PT Laguna Mandiri.

There is representative memorandum of understanding transportation service contractor on dated December 7, 2019 which informed that the contractor agreed to be interviewed by the RSPO team and agreed to meet the principles and criteria applicable in the RSPO certificate system implemented by PT LMI and agreed to meet the RSG (Responsible sourcing Guidelines) while having a business license, implementing OHS, Respecting Human Rights, not employing minors (<18 years) and respecting each individual.

**3.8.10.**

The company shows a list of BTF CPO & IKS contractors with details:

<b>Name of contractor</b>	<b>CLA number</b>	<b>Activities</b>	<b>Addressed</b>
CV Karya Stihl	019/Jasa pengangkutan CPO/BTF-CV.Karya Stihl/X/2019	CPO	Jalan Pamukan Jaya KM 3 No.126 Kecamatan Sungai Durian Kabupaten Kotabaru
CV Cahaya Mandiri Sejahtera	020/Jasa pengangkutan CPO/BTF-CV.CMS/X/2019	CPO	Jl Yakut Gang Sentosa No.101 RT 11 Batulicin Kabupaten Tanah Bumbu
Bumdes Cahaya Berkembang	021/Jasa pengangkutan CPO/BTF-Bumdes/X/2019	CPO	Jl. Pamukan Raya Km 03 Desa Manunggal Lama, Kecamatan Sungai Durian, Kabupaten Kotabaru
CV Raja Runding	022/Jasa pengangkutan CPO/BTF-CV.RR/X/2019	CPO	Jl. Ratu Intan, Desa Bakau Kecamatan Pamukan Utara, Kabupaten Kotabaru, Kalsel
Lansap N	No.012/Jasa Pengangkutan/LMI- Lansap/X/2018	PK	Desa Balaimea, Kecamatan Pamukan Utara, Kabupaten Kota Baru, Kalsel
Harinal Rominadi	No.013/Jasa Pengangkutan/LMI-Abdul Kadir/X/2018	PK	Desa Bepara, Kecamatan Pamukan Utara, Kabupaten Kotabaru, Kalsel



Abdul Kadir	No.014/Jasa Pengangkutan/LMI-Abdul Kadir/X/2018	PK	Desa Bakau, Kecamatan Pamukan Utara Kabupaten Kotabaru, Kalsel
Yensmit	No.015/Jasa Pengangkutan/LMI- Yensmit/X/2018	PK	Desa Belung, Kecamatan Pamukan Utara Kabupaten Kotabaru, Kalsel

### 3.8.11.

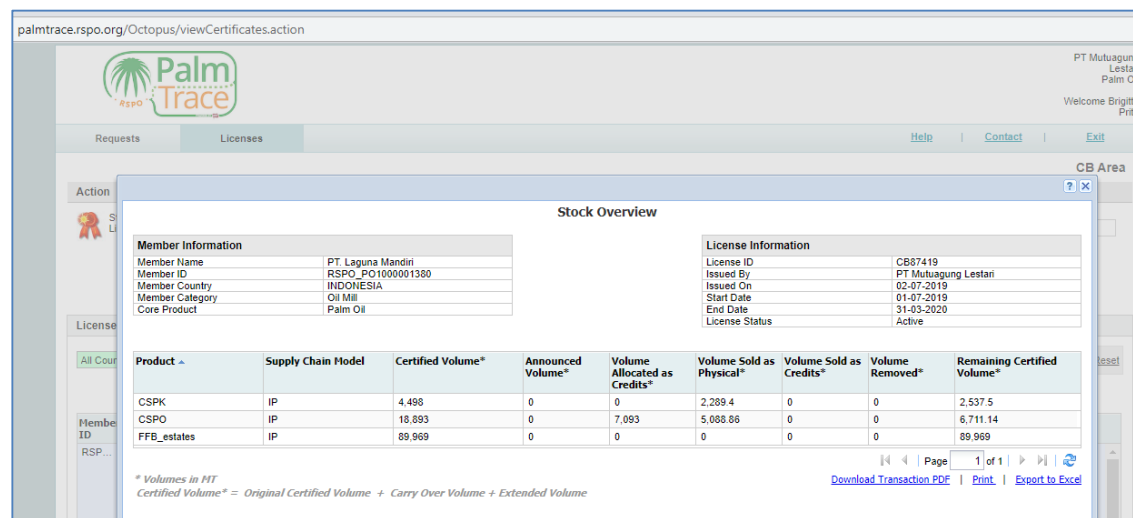
It will be verified in the next surveillance, based on document and interview with management representative there is new contractors.

### 3.8.12.

#### Evidence observed:

Based on RSPO IT Platform (palm trace) data on March 12, 2020 it is known that:

- CSPK *certified* volume sebesar 4,498 MT.
- CSPO *certified* volume sebesar 18,893 MT.
- Volume allocated as credits 7,093 MT.
- Volume sold as physical CSPK of 2,289.40 MT
- Volume sold as physical CSPO of 5,088.86 MT
- Remaining certified volume for CSPK of 2,537.50 MT, should **2,208.60 MT**.
- Remaining certified volume for CSPO of **6,711.14 MT** (7,093 MT + 5,088.86 MT).



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	IP	4,498	0	0	2,289.4	0	0	2,537.5
CSPO	IP	18,893	0	7,093	5,088.86	0	0	6,711.14
FFB_estates	IP	89,969	0	0	0	0	0	89,969

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

#### Non-Conformance Description:

Based on the explanation above, unit management has not been able to show evidence of remaining CSPK remaining volume of 2,208.60 MT (Difference 328.9 MT) on the RSPO IT Platform data. Its become **NCR No.2020.04 with critical category**.

### 3.8.13 & 3.8.14.

BTF only performs FFB processing up to CPO and PK. Based on RSPO SCCS Manual, it is explained that the conversion factors of CPO and PK are based on actual extraction.

### 3.8.15.

Organization applying RSPO SCCS Module E (Mass balance).

**3.8.16.**

The company shows CSPO and CSPK sales documents with details:

Mar 2019 - Feb 2020	
CSPO Sold as RSPO Claim	5,088.86
CSPO Sold as Conventional	6,790.88
CSPO Production	13,946.24
Non CSPO Production	358.37
Total CPO Production	14,305
Stock RSPO	8,857
Remove	6,433

March 2019 - Feb 2020	
CSPK Sold as RSPO Claim	2,289.40
CSPK Sold as Conventional	0
CSPK Production	4254.33
Non CSPK Production	78.39
Total PK Production	4,332.72
Stock RSPO	1,964.93
Remove	0

**3.8.17.**

Betung Factory does not use trademark and RSPO logo on its operation, sales document and business communication.

<b>Critical</b> <b>3.8.12</b>	<b>Status: Non-conformance No.2020.04 with critical category.</b>	
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**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.**

A human rights policy document that defines basic human rights, including reproductive rights, privacy rights, women's rights and children's rights. Issued on 1 September 2015 by SOU9 Chairman. The policy describes respecting human rights and respecting race, nation, culture, religion and without forced labor, ensuring that all employees receive fair remuneration, fair management and opportunities to develop careers. The company has socializing this policy to all workers and contractor on each unit. For example: Sekayu Estate has socializing this policy dated 1 December 2019 to all workers and contractors.

**4.1.2**

There are no changes related to the company's commitment to avoid escalation of conflict and there should be no use of violence listed in the Memo from the Chairman of SOU09 of Betung factory on September 1, 2015 regarding to the Policy on Prohibiting the Use of Mercenaries or Paramilitaries. It has been socialized to the workers on 20 January 2020.

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

The company has an SOP for handling complaints and grievance from various parties, namely in the SOP no: 077/LMI-Stkhldr.ADM/2012, dated October 8, 2015. In the SOP describes the handling of complaints starting from the stage of receiving complaints from internal and external, Verification and ranking of complaints, preparation of treatment plans, implementation of handling, monitoring of implementation, and documentation to completion through legal channels. Guarantee anonymity of the whistle-blower of the case has been maintained since from first stage. In the SOP it is stated that the settlement of complaints is made no later than 1 month after receipt.

**4.2.2**

Based on field observation and interview with several workers and union board sighted that there are no complaint from workers to the company. All workers also has understood about this mechanism. To ensure that the procedures can be understood by employees who can't reading and writing by regularly socialization on the morning call.

**4.2.3; 4.2.4**

Based on external complaint monitoring record sighted that there are no complaint during period of 2019/2020. In addition, based on interview with communities from Balaimea Village, Sekayu Baru Village and Betung Village sighted that there are no complaint to the company.

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

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

**4.3.1.**

The company has monitored social impacts on 30 April 2018 by making a questionnaire to the communities surrounding the company and *KKPA*. Other villages that were surveyed were Sekayu Village, Bepara Village and Betung Village. Aspects surveyed in the questionnaire: 1. Public opinion about the company's existence. 2. Community opinion is carried out by *KKPA* in the Village 3. Livelihoods before and after the existence of plantations 4. Changes in income before and after the company 5. Community views on the continuation of plantations and *KKPA* 6. Increasing employment and increasing wholesale work. The following survey results include: From a survey conducted 48.78% of respondents cited the opinion that the existence of plantations and *KKPA* really helped the economy and the welfare of the community, and 48.78% stated it was quite helpful in improving the economy and welfare of the community, while as many as 2.44% thought they were less helpful. Regarding the livelihoods of the surrounding communities before and after the company, according to the survey results, there was a positive impact. Previously, the land farmers themselves when there was a company and the *KKPA* program could work in the company and in the *KKPA* Unit. From sharing monitoring of environmental and social impacts at PT LMI and *KKPA* plantations, that for social and economic conditions the community has a positive impact, especially in increasing employment, increasing community income and increasing business opportunities in the surrounding communities. This Social Impact Monitoring was carried out on 30 April 2018. Based on the results of interviews with company staff, monitoring will be carried out again in 2020. The company shows proof of handover dated March 16, 2019 with a financial assistance of Rp. 5,000,000 for bridge repairs on the Rurai Village to Sengayam road axis. This is based on a request for assistance from the Pamukan Barat District Government with letter No. 007/36 / PMB / 2019 dated February 11, 2019.

<b>Status: Comply</b>
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**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; 4.4.4; 4.4.5 & 4.4.6.**
**Land Use Title**

The company has had the land rights in the form of Land Use Title (HGU) for an area of 15,300 hectares which consist of 10 certificates.

**Plantation Business Permit**

The company has an IUP according to Kotabaru Regent Decree No. 188.45 / 390 / KUM / 2009 dated October 15, 2009 with an area of 15,300 ha and a plant capacity of 60 tons of FFB / hour. The area of HGU & IUP covers the Rantau, Matalok, Sekayu and Betung plantation areas. For the scope of this certificate (PKS Betung) only covers 2 Estate namely Sekayu Estate and Betung Estate with a total area of 7,580

Procedure related to resolving land conflicts do not change as stated in the SOP on Conflict Handling No. 059/LMI-PK /2012

which explains that land dispute resolution is carried out through compensation based on the results of land inventory and deliberation by involving related parties (residents claiming, community representative, Village Apparatus, Plantation Service Department of Minamas Group and representatives of the Unit Management).

Based on interview with Balaimea Village, Sekayu Baru Village community leaders, Head of Sekayu Baru Village, Betung Village community leaders as previous land owner), So far there have been no land disputes, restrictions on access to the company.

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 - 4.5.8.

There is no new planting or new acquisition under Betung Estate and Sekayu Estate. PT LMI has the land rights in the form of Land Use Title (HGU) for an area of 15,300 hectares which consist of 10 certificates and there is no customary land. Based on interview with Balaimea Village, Sekayu Baru Village community leaders, Head of Sekayu Baru Village, Betung Village community leaders So far there have been no land disputes, restrictions on access to the company.

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 - 4.6.4.

Procedure related to resolving land conflicts do not change as stated in the SOP on Conflict Handling No. 059/LMI-PK /2012 which explains that land dispute resolution is carried out through compensation based on the results of land inventory and deliberation by involving related parties (residents claiming, community representative, Village Apparatus, Plantation Service Department of Minamas Group and representatives of the Unit Management).

Based on interview with Balaimea Village, Sekayu Baru Village community leaders, Head of Sekayu Baru Village, Betung Village community leaders So far there have been no land disputes, restrictions on access to the company.

Status: Comply

#### 4.7

**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.**

##### 4.7.1; 4.7.2 & 4.7.3

Procedure related to resolving land conflicts do not change as stated in the SOP on Conflict Handling No. 059/LMI-PK /2012 which explains that land dispute resolution is carried out through compensation based on the results of land inventory and deliberation by involving related parties (residents claiming, community representative, Village Apparatus, Plantation Service Department of Minamas Group and representatives of the Unit Management).

Based on interview with Balaimea Village, Sekayu Baru Village community leaders, Head of Sekayu Baru Village, Betung Village community leaders So far there have been no land disputes, restrictions on access to the company. The company provides opportunities for the community to work together to develop plantations by employing local contractors such as vehicle rental and others.

Status: Comply

#### 4.8

**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.**

**4.8.1, 4.8.2, 4.8.3 & 4.8.4.**

Procedure related to resolving land conflicts do not change as stated in the SOP on Conflict Handling No. 059/LMI-PK /2012 which explains that land dispute resolution is carried out through compensation based on the results of land inventory and deliberation by involving related parties (residents claiming, community representative, Village Apparatus, Plantation Service Department of Minamas Group and representatives of the Unit Management).

Based on interview with Balaimea Village, Sekayu Baru Village community leaders, Head of Sekayu Baru Village, Betung Village community leaders So far there have been no land disputes, restrictions on access to the company.

**Status: Comply**

**PRINCIPLE #5 SUPPORT SMALLHOLDER INCLUSION**

**5.1**

**The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.**

**5.1.1**

For the determination of FFB prices for farmers, it has been agreed in:

- Cooperation Agreement of PT. Swadaya Andika (still 1 group with PT. LMI) with the Cooperative "Bina Swadaya Karya" in the context of the development and management of oil palm plantation projects with the Plasma Core partnership pattern (Number 001 / PK-SAA / X 2008) on August 11, 2008. KKPA is still in the phase of paying off credit so that it has not yet received payment for FFB production. This is proven by the Plasma Estate Management Report for 2019 and also signed by the Bina Swadaya cooperative.
- Palm Oil Fruit Bunch Sale and Purchase Agreement between Bumdes Pondok Labu Jaya and PT. Plenary of Swakarsa (still 1 group with PT. Laguna Mandiri) no. 005 / TBS / PSA-Bumdes Pondok Labu Jaya / XII / 2019 with a validity period until the community's palm oil plantations are considered not productive anymore so it needs to be replanting using certified seed sources in accordance with the rules of good management of palm oil plantations and sustainable. Based on 2019 data, no FFB has been entered from the Pondok Labu Bumdes.
- Purchase Agreement for Fresh Fruit Bunches between Bumdes Mulyoharjo and PT. Laguna Mandiri no. 002 / TBS / LMI-Bumdes Mulyoharjo / VIII / 2019 with a validity period of 5 years from August 1, 2019.

Determination of the price of FFB is agreed based on the formula as follows:  $FFB\ Prices = Index\ K \times \{(CPO\ Price \times \% OER) + (PK\ Price \times \% KER)\}$  Information :

- The K index used is based on the value issued by the South Kalimantan Provincial Plantation Office in accordance with the month of shipment.
- CPO prices and PK prices are based on CPO and PK sales prices from the Palm Oil Mill in the current month
- OER and KER values are adjusted based on survey results and sample tests as follows:  
BJR <10 Kg: OER (15.00%), KER (3.00%)  
BJR <10 Kg: OER (16.50%), KER (3.50%)

This Agreement was signed by both parties and was known by the regional government of Kota Baru Regency, South Kalimantan Province.

**5.1.2**

For the determination of FFB prices for farmers, it has been agreed in:

- Cooperation Agreement of PT. Swadaya Andika (still 1 group with PT. LMI) with the Cooperative "Bina Swadaya Karya" in the context of the development and management of oil palm plantation projects with the Plasma Core partnership pattern (Number 001 / PK-SAA / X 2008) on August 11, 2008. KKPA is still in the phase of paying off credit so that it has not yet received payment for FFB production. This is proven by the Plasma Estate Management Report for 2019 and also signed by the Bina Swadaya cooperative.
- FFB Sale and Purchase Agreement between Bumdes Pondok Labu Jaya and PT. Paripurna Swakarsa (still 1 group with

PT. Laguna Mandiri) no. 005 / TBS / PSA-Bumdes Pondok Labu Jaya / XII / 2019 with a validity period until the community's palm oil plantations are considered not productive anymore so it needs to be replanting using certified seed sources in accordance with the rules of good management of palm oil plantations and sustainable. Based on 2019 data, no FFB has been entered from the Pondok Labu Bumdes.

- Purchase Agreement for FFB between *Bumdes* Mulyoharjo and PT. Laguna Mandiri no. 002 / TBS / LMI-Bumdes Mulyoharjo / VIII / 2019 with a validity period of 5 years from August 1, 2019.

Determination of the price of FFB is agreed based on the formula as follows:  $\text{FFB Prices} = \text{Index K} \times \{(\text{CPO Price} \times \% \text{ OER}) + (\text{PK Price} \times \% \text{ KER})\}$  Information :

- The K index used is based on the value issued by the South Kalimantan Provincial Plantation Office in accordance with the month of shipment.
- CPO prices and PK prices are based on CPO and PK sales prices from the Palm Oil Mill in the current month
- OER and KER values are adjusted based on survey results and sample tests as follows:  
BJR <10 Kg: OER (15.00%), KER (3.00%)  
BJR <10 Kg: OER (16.50%), KER (3.50%)

This Agreement was signed by both parties and was known by the regional government of Kota Baru Regency, South Kalimantan Province.

For information on FFB prices, from the Company notifying farmers via email, this was indicated by an email on 17 February 2020 to *Bumdes* Sumber Makmur. In the email it was informed in relation to the price period 16-29 February 2020.

#### **5.1.3**

For the determination of FFB prices for farmers, it has been agreed in:

- FFB Sale and Purchase Agreement between *Bumdes* Pondok Labu Jaya and PT. Paripurna Swakarsa (still 1 group with PT. Laguna Mandiri) no. 005 / TBS / PSA-Bumdes Pondok Labu Jaya / XII / 2019 with a validity period until the community's palm oil plantations are considered not productive anymore so it needs to be replanting using certified seed sources in accordance with the rules of good management of palm oil plantations and sustainable. Based on 2019 data, no FFB has been entered from the Pondok Labu Bumdes.
- Palm Oil FFB Agreement between Bumdes Sumber Makmur in Mulyoharjo Village and PT. Laguna Mandiri no. 002 / TBS / LMI-Bumdes Mulyoharjo / VIII / 2019 with a validity period of 5 years from August 1, 2019.

For information on FFB prices, from the Company notifying farmers via email, this was indicated by an email on 17 February 2020 to Bumdes Sumber Makmur. In the email it was informed in relation to the price period 16-29 February 2020.

#### **5.1.4**

The company shows the Plasma Estate Management Report for the period 2019 and was also signed by the Bina Swadaya cooperative.

#### **5.1.5**

For the determination of FFB prices for farmers, it has been agreed in:

- Cooperation Agreement of PT. Swadaya Andika (still 1 group with PT. LMI) with the "Bina Swadaya Karya" Cooperative in the context of the development and management of a palm oil plantation project with a Plasma Core partnership pattern (Number 001 / PK-SAA / X 008) on August 11, 2008. cooperation until the palm oil plantations do not produce anymore / are not economically feasible with the determination agreed upon by the parties or reach the age of 25 years to 30 years, whichever comes first. Letter of Agreement was signed by both parties and knew.
- FFB Sale and Purchase Agreement between *Bumdes* Pondok Labu Jaya and PT. Paripurna Swakarsa (still 1 group with PT. Laguna Mandiri) no. 005 / TBS / PSA-Bumdes Pondok Labu Jaya / XII / 2019 with a validity period until the community's palm oil plantations are considered not productive anymore so it needs to be replanting using certified seed sources in accordance with the rules of good management of palm oil plantations and sustainable.
- Purchase Agreement for FFB between *Bumdes* Mulyoharjo and PT. Laguna Mandiri no. 002 / TBS / LMI-Bumdes Mulyoharjo / VIII / 2019 with a validity period of 5 years from August 1, 2019.



**5.1.6**

The company has presented proof of invoices for the payment of FFB from Bumdes Labu Jaya Farmers Group for the period 1-15 February 2020, submitted on 18 February 2020 and invoices for payment of FFB of the Sumber Makmur Farmers Group for the period 1-15 February 2020, submitted on 18 February 2020.

**5.1.7**

PT. LMI has tested the electronic bridge scales tested by the CV Pra Kalibrasi and the Regional Legal Metrology Standards Center III proved by the Temporary Calibration Certificate (No: PKCV / 86 / PKY / III / 2019 and is valid until March 5, 2020. For recalibration, the company has submitted an application to the CV Pra Kalibrasi (Letter No. RTC-AWD / 24 / II / 2020 dated February 22, 2020) to recalculate the weighbridge. In accordance with the email on February 27, 2020, for the implementation of this activity is still waiting for the certainty of the schedule of the BMKG and Regional Legal Metrology Standards III.

The company immediately followed up on the weighbridge recalibration process. This will be verified in the next audit activity. (OFI).

**5.1.8**

The company has conducted socialization related to RSPO that aims to encourage the community to participate in obtaining RSPO certificate on March 6, 2020 which was attended by:

1. Bumdes Mulyoharjo Farmers are 15 people
2. Bumdes Pondok Labu Farmers: 25 people

**5.1.9**

The company already has a SOP on Complaints Handling Mechanism for All Parties and the Community (086 / LMI-Stkhdr.ADM / 2018). In this procedure, the response to the complaint / aspiration and / or which has received approval from the Head Department and / or the relevant Department (if necessary) is done no later than 2 weeks (14 days) from the date the letter / complaint is received by the operational unit. In 2019 there were no complaints from farmers.

<b>Status: Comply</b>
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**5.2**

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

**5.2.1**

Primary Member Cooperative Credit (KKPA) for the villages of Bepara, Sekayu and Balaimea in the case of the management of palm oil plantations is carried out entirely by the company.

Based on Kotabaru Regent Decree No. 188.45 / 540 / KUM / 2019 concerning Determination of Plasma Participants in the Development of Palm Oil Commodity Members of the "Bina Swadaya Karya" Cooperative in Bepara, Sekayu and Balaimea Villages, Pamukan Utara District with the core company PT. Laguna Mandiri. The total area of land determined for participants in the plasma development of oil palm commodity members of the cooperative "Bina Swadaya Karya" are:

- a. The village of Bepara covering 128 hectares
- b. Sekayu Baru Village with an area of 155 Ha
- c. Balaimea village area of 109.70 Ha

With a list of Plasma participants as follows:

1. The village of Bepara numbered 68 people
2. Sekayu Baru Village numbered 155 people
3. Balaimea Village numbered 66 people

To increase understanding among farmers, the company has conducted socialization related to the RSPO, Agronomy, Code of Ethics, the Process of Buying and Selling FFB from outside parties to farmers including women on March 6, 2020 which was attended by:

1. Bumdes Mulyoharjo Farmers are 15 people
2. Bumdes Pondok Labu Farmers are 25 people



From the socialization participants there were representatives from women as stated in the attendance socialization, for example Suryani as treasurer of *Bumdes* and Paimi as Farmers.

#### 5.2.2, 5.2.3

The company has conducted socialization related to RSPO that aims to encourage the community to participate in obtaining RSPO certificate on March 6, 2020 which was attended by:

1. *Bumdes* Mulyoharjo Farmers are 15 people
2. *Bumdes* Pondok Labu Farmers: 25 people

#### 5.2.4

The CH presented the RSPO Socialization document, the Code of Ethics, OCP, and Agronomic Management on March 6, 2020 at the Mulyoharjo Village Hall. The socialization was attended by 23 people who were also plasma farmers. Based on the document review of the socialization material, it is known that one of the materials provided is related to the handling and how to apply pesticides safely. In addition, the CH also presented a list of attendees, documentation and socialization materials.

#### 5.2.5

The company has presented the Plasma Estate Management Report for the period 2019. The document has also been signed by the Bina Swadaya Karya.

The company has conducted socialization related to RSPO that aims to encourage the community to participate in obtaining RSPO certificate on March 6, 2020 which was attended by:

1. *Bumdes* Mulyoharjo Farmers are 15 people
2. *Bumdes* Pondok Labu Farmers: 25 people

Based on interviews with a review will be conducted related to the program carried out in 2021.

**Status: Comply**

### PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS

#### 6.1

**Any form of discrimination is prohibited.**

##### 6.1.1

The Certification unit has a Social Policy signed by Head of Plantation Upstream Indonesia on December 2011, on of which is explained: Every staff/employee should be treated fairly in matters relating to recruitment, promotion, boundaries and conditions of employment without regard to personal issues such as: race, rank, ethnicity, gender, skin color, physical, organizational membership, political views, religion and/or age. The policy has been socialized to all employees dated 1 December 2019 at BTE and dated 11 February 2020 at SYE.

##### 6.1.2

Based on interview with several PKWT workers in mill, estates, and also union board sighted that so far there has never been a cost quote in the recruitment process.

##### 6.1.3.

The Certification unit has implemented recruitment procedure, for example: PKWT on behalf SST. Based on BTE Manager Letter to the CSE of KSP Region number 092/Mgr BTE-CEO-KSP/X/2019 dated 2 October 2019. All of administration requirement has verified by auditor team.

##### 6.1.4

Based on interview with several workers in the estates and mill, gender committee board and worker union board, it's known that there has never been a pregnancy test that has become a discrimination measure.

##### 6.1.5

The company has formed a Gender Committee in management unit chaired by Nina. Based on interviews with the Gender

Committee and female workers known that breastfeeding workers are not permitted to work using chemicals. Workers who are breastfeeding are also given the opportunity to breastfeed their children.

**6.1.5.**

The Certification unit has paid each workers with equal wages for the same scope of the work. There are Inter-Office Mail from Head of Human Resources Management number 118/HRM/i5/XII/2019 dated 26 December 2019 about permanent worker wages system in year of 2020 is Rp 3,034,828.97/month, if absent from work the deduction wages is Rp 121,393,15/day. The auditor team also verified sample of wages slip on January 2020, for example: registry number 9524 from BTE with gross wages: Rp 3,894,305; registry number 112140 from BTF with gross wages: Rp 5,873,483. Based on Kalimantan Selatan Province Governor Decree number 188.44/0895/KUM/2019 sighted that minimum wages of Kotabaru District is Rp 3,034,828.97.

<b>Status: Comply</b>
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**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 & 6.2.3**

The Certification unit already has a Collective Labor Agreement period of 2018 until 2020 signed by both of parties. There are explained the acknowledgment of the parties, such as: recruitment, appraisal, appointment, placement & transfer of workers, work time & overtime, leave & permit, wage system, work equipment, annual income allowance, work termination, etc.

**6.2.2.**

Based on document verification sighted that the certification unit only employ permanent workers and specific time workers (PKWT). All rights of permanent workers has been covered on the CLA, while PKWT rights are contained on each agreements. All PKWT rights is same with permanent worker rights, such as: annual leave, rice allowance, social security insurance. There is sample of PKWT agreement number 024/BTE-EM/SPK/IX/2019 dated 21 September 2019 until 31 December 2019.

**6.2.4 & 6.2.5.**

The company has provided facilities and infrastructure to support the worker welfare in each management unit, such as permanent housing, electricity sources through generator sets available in each housing, clean water through the provision of bore wells and the provision of clean water tanks in each unit, clinics available in each unit, there is a place for kindergarten and elementary school. Based on field visits in the housing area are known that there are several stalls belonging to employees that provide basic daily necessities at affordable prices. Based on document verification and interview with mill and estates staff sighted that the company has budget for housing upgrade/maintenance, for example Capital Expenditure number M2020/9416/00000581 related housing upgrade in SYE Division 3 for 14 unit houses.

**6.2.6.**

The certification unit has carried out prevailing wage calculations by including several components including: minimum wages, rice allowances, water allowances, electricity allowances, school transport allowances, medical allowances (including transport). The calculation results in each unit are as follows: SYE: Rp 5,019,602; BTE: Rp 4,654,579; BTF: Rp 3,926,218.

**6.2.7**

Based on document verification sighted that the certification unit use permanent workers and PKWT workers. There are 407 workers in BTE (67 monthly workers, 243 permanent workers, and the rest is PKWT); 445 workers in SYE (384 permanent workers and the rest is PKWT); 57 workers in BTF (49 monthly workers, 2 permanent workers, and 6 PKWT workers).

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

The Certification unit already has a Collective Labor Agreement period of 2018 until 2020 signed by both of parties. There are explained the acknowledgment of the parties, such as: recruitment, appraisal, appointment, placement & transfer of workers, work time & overtime, leave & permit, wage system, work equipment, annual income allowance, work termination, etc.

**6.3.2**

Based on interview with worker union unit of SYE head sighted that there are three worker union unit. There are regularly meeting between company and worker union, such as: the latest meeting in SYE about harvesting system dated 6 September 2019, meeting about election of worker union board in BTE dated 14 December 2019.

**6.3.3**

Based on interview with worker union board sighted that management didn't interfere in the formation of worker union. Each union has the following members: BTE: 428 members, SYE: 485 members, and BTF: 53 members. In addition, the certification unit also has facilitate the worker unions. If the union board is needed to attend the meeting on the Kota Baru Regency level.

<b>Status: Comply</b>
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**6.4**

**Children are not employed or exploited.**

**6.4.1**

The certification unit has a procedure for recruitment of employee number 028/LMI-SKU/2012, in which it states that the prospective workforce is at least 18 years old and not older than 40 years old. Therefore based on interview with contractor sighted that for the 2020 contract, there are ban on child workers.

**6.4.2; 6.4.3**

Based on field observation to SYE, BTE, and BTF; it's known that there are no employees working under the age of 18 years old. Therefore based on list of employees document sighted that there are no employees which joint with the company under the age of 18 years old.

**6.4.4**

Based on interview with contractor sighted that for the 2020 contract, there are ban on child workers. The certification unit also has socialized the policy about ban on child workers in BTE and SYE dated 1 December 2019 and 11 February 2020 respectively.

<b>Status: Comply</b>
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**6.5**

**There is no harassment or abuse in the workplace, and reproductive rights are protected.**

**6.5.1 & 6.5.2**

The certification unit has a Social Policy number 724/TQEM-SPM/09 dated 8 November 2010 state that the company developing and implementing policies to prevent sexual harassment and forms of crime against women and protect reproductive rights. Based on document verification sighted that the company has socialized this policy to the worker and contractor dated 10 January 2020 and 11 February 2020 respectively.

**6.5.3**

The Gender Committee and the management of PT LMI has held a meeting on 2 February 2020, there were a number of inputs and suggestions including:

1. Young mothers (having children age < 24 months) are given space to breastfeed their children, such as child care.

2. Young mothers are given jobs that don't use chemicals.
3. Young mothers are given a work area not far from housing complex or child care, so that every four hours they can breastfeed their children.
4. The management can provide policy for young mothers to take a break after breastfeeding can resume their work.
5. Young mothers are given health facilities for health check and child development for up to 24 months.

#### 6.5.4

The certification unit has complaint handling mechanism for all parties and society number 077/LMI/Stkhldr.ADM/2012 dated 8 October 2015. In Chapter V point 5.5 states that the company guarantees the security and confidentiality of reporter (whistleblower) and also attached a flow chart of the mechanism for handling complaint's by all parties (stakeholders). Head of Section or Assistant accommodates & studies complaints/aspirations and reported to the unit manager. Complaints will be responded by the company a maximum of 14 days from the date the complaint was received by the operational unit. This procedure was socialized to all employees and contractors dated 1 December 2019 and also to other contractors dated 11 February 2020.

**Status: Comply**

#### 6.6

**No forms of forced or trafficked labour are used.**

##### 6.6.1 & 6.6.2

Based on document verification sighted that there are no migrant workers on this certification unit, there are only permanent workers and PKWT workers. In addition, based on interview with worker union board sighted that so far, there has never been a penalty for termination of employment, bonded labor practices, withholding wages, and forced overtime.

**Status: Comply**

#### 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 CH has an OHS Committee structure along with facilities and infrastructure in each work unit as follows:

- Estate  
Decree of the South Kalimantan Provincial Manpower and Transmigration Head No. 566/484/Was-NKT/2018 dated 9 October 2018 concerning the approval of the OHS Committee at PT Laguna Mandiri - Sekayu Estate with a secretary on behalf of Antonius Dedi with No Reg. 2578/PK3/AJ/31/2019/P2 dated November 25, 2019 and valid for 3 years.
- Mill  
Decree of the South Kalimantan Provincial Manpower and Transmigration Head No. 566/548/Was-NKT/2017 dated 23 October 2017 concerning the approval of the OHS Committee at PT Laguna Mandiri – Betung Mill with a secretary on behalf of Doni Kusuma with No Reg. 6202/PK3/AJ/31/2019/P2 dated November 25, 2019 and valid for 3 years.

The CH regularly (every month) holds an internal meeting of the OHS committee to discuss the implementation of OHS in the CH's operational areas as follows:

- Mill  
The OHS Committee meeting for the February 2020 period was held on February 10, 2020. The discussion included the socialization of the use of PPE, the socialization of LOTO, the socialization of employee facilities and infrastructure, the checking and refilling of fire extinguisher, the repair of lights and the installation of sirens as signs of emergency danger in the schedule waste storage.
- Estate  
The OHS Committee meeting for the February 2020 period was held on February 10, 2020. The discussion included the distribution of PPE that did not cover all employees, and the storage of work tools in residential areas that had not been stored safely.

##### 6.7.2

The CH has the following procedures for handling work accidents and emergencies in operational areas::

- SOP with document number 722 / PSQM-PSS / 10 about the OHS Guidelines that were approved by the CEO on December 13, 2010. The SOP regulates the purpose, scope, definition, general information, OHS pictorial (security, safety signs, offices, housing, warehouse, traction, harvesting, spraying, fertilizing, vehicles and public).

- SOP with document number 711 / TQEMS-P2K3 / 07 concerning Occupational Safety and Health which was approved by the PSQM Manager on November 23, 2007. The procedure regulates management administration, OHS Committee, Hazard Identification Risk Assessment Control (HIRAC), work accident reports, investigations and follow-up, communication, personal protective equipment, and work safety systems.
- SOP for land fire prevention with document number SOP-PK / 08-LMI dated April 1, 2013, which was approved by the unit manager. The procedure explains starting from the establishment of fire prevention organizations, identification and maintenance of water sources, identification of fire-prone areas, installation of warning boards for fire-prone areas, construction of fire towers in every estate and procurement of land fire suppression equipment.

The CH has provided first aid kits both indoors and outdoors. First aid boxes in the field are usually held by each foreman. Based on interviews with management known that checking the first aid kit was done every month by the assistant division and if there were deficiencies it would be conveyed to the doctor/paramedics of the CH to be completed. At the time of the audit activity the CH showed the first aid box inspection documents in the CH's operational area, for example in the laboratory, workshop and schedule waste storage warehouse. Based on the inspection results known that the contents of the first aid kit are complete and ready to use.

The CH has conducted First Aid Kit training to increase knowledge, understanding, and understanding of the implementation of First Aid Kit in the workplace and also improve skills in conducting first aid against sudden illness and work accidents, for example:

- OHS and First Aid Kit socialization, 5 September 2016, speaker Dr. Irwan Kertajaya, the location of SDS Central Betung Estate, was attended by 55 participants
- OHS socialization to replanting contractors, on January 16, 2016, Assistant Division I speaker, location of C-37 Betung Estate block, attended by 6 participants

#### **6.7.3**

The CH has a procedure related to Personal Protective Equipment (PPE) with document number 739/TQEM-ESH/10 revised no.2 dated November 1, 2016. The procedure explains that all PPE must be replaced when it does not provide a guarantee of protection anymore. The CH shows the PPE awarding documents to employees as follows: minutes of the boot shoes transfer totaling 136 pairs in February 2020 and monitoring of PPE replacement for the February 2019 period. Monitoring shows that there were PPE replacements to 7 sprayer that were given earlier on September 29, 2018. Based on the results of the daily PPE examination it is known that all employees and staff have used the PPE that is appropriate in their work.

Based on document verification and interviews with management revealed that the CH checks every day employee discipline in using PPE. Checks are usually carried out in the morning before employees leave for work in the field. The results of compliance checks on employee PPE usage are recorded in the Sime Card monitoring book and reported to each management unit.

Based on field observations and interviews with estate and mill employees found that the CH had provided PPE storage facilities and work tools for employees so that PPE and work tools were not brought home after work. In addition, the CH has also provided sanitation facilities for workers who use chemicals so that employees can take a shower before returning to their respective homes

#### **6.7.4**

The CH shows the proof of health and employment insurance payment for all workers in the operational area as follows:

- Payment proof of health and employment insurance for 21 employees of CV Risa Jaya for the February 2020 period on March 3, 2020.
- Payment proof of health and employment insurance for employees of CV Kabahuman Jaya Abadi for the February 2020 period on March 5, 2020.
- Payment proof of health and employment insurance for 51 permanent workers and 6 contract workers of Betung Factory paid on March 3, 2020. This has been matched with employee data for the same period.
- Payment proof of health and employment insurance for 386 permanent workers and 100 contract workers of Sekayu Estate paid on March 5, 2020. This has been matched with employee data for the same period.

- Payment proof of health and employment insurance for 322 permanent workers and 86 contract workers of Betung Estate paid on March 5, 2020. This has been matched with employee data for the same period

Based on interviews with permanent and contracts workers in the estate and factory, known that the workers have been included in the health and employment insurance program for work accident and death insurance in this case the worker explained that each worker already has a membership card.

#### 6.7.5

The CH routinely reports every accident that occurs in its operational area. Reporting on work accidents is recorded in the OHS Committee Quarterly Report sent to the Department of Manpower and Transmigration in the relevant Regency. The CH shows the documents related to work accident reporting within the past 1 year in the table as follows:

Unit	2019		2020	
	Case	LTA	Case	LTA
SYE	37	69	5	15
BTE	19	19	-	-
BTF	-	-	-	-

For accidents that occur, the CH has investigated accidents and taken action to prevent accidents from happening again. The investigation is contained in the work accident investigation and evaluation document which explains the victim's biographical data, time of the incident, accident chronology, part of the injury, investigation of dangerous actions & conditions and suggestions for improvement.

**Status: Comply**

### **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

CH shows the documented observations of Plant Pest Disturbance period 2019-2020 documented, as follows:

1. Census of oryctes rhinoceros pests on August 3, 2019 with 367 census principal points and 23 new attacks (6.27%). The CH carried out control by spraying using Cypermethrin as much as 72.80 liters for 60.70 Ha on August 5, 2019.
2. Census of fire caterpillar pests on August 14, 2019 with 366 census principal points and 17 new attacks (4.64%). The CH cites caterpillars for every subject that is attacked.
3. Census of rat pests on February 1, 2020 with a sample of 1,056 principal and there were 15 main attacks (1.42%) or were still below the economic threshold so control was not carried out.

In an effort to control pests while reducing chemical use, the CH uses biological techniques by planting beneficial plants such as Cassia cobanensis, Turnera subulata, Antigonon leptopus and utilizing the natural enemies of rat pests by developing owls

##### 7.1.2

The CH does not use suitable species in the Global Invasive Species Database and CABI.org in its managed areas. During the audit, the CH showed species documents including: Antigonon leptopus, Euphorbia heterophylla, Turnera subulata, Cassia cobanensis and Tyto alba.

##### 7.1.3

The CH showed the memorandum on Head of Plantation Upstream Indonesia on August 7, 2014 under number M-077 / HPUI / VIII / 2014, it was explained that the CH did not burn in any form, and must implement zero burning in all Minamas plantation activities.

The CH has procedures related to oil palm cultivation contained in the Agricultural Reference Manual (ARM) No. Policy 110 / EST-ARM / 13 signed by Head of Plantation Upstream Indonesia on September 16, 2013. Procedures related to land



clearing activities are in Section 4 regarding land preparation which explains that land clearing activities are carried out mechanically without burning.

Based on field observations and interviews with workers and the surrounding community revealed that there was no indication of the use of fire in the CH's operational such as replanting. Further explained that replanting carried out by the fallen, chopped and stacked methods.

**Status: Comply**

## 7.2

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

### 7.2.1 and 7.2.2

The CH has procedures related to the use of chemicals such as spraying and pest control. The procedure is contained in the Agricultural Reference Manual (ARM) with document number 110/EST-ARM/13. Section 15 describes the protection of plants from pests and diseases consist of horn beetle, fire caterpillars, rodents and ganoderma control for base rot and stem rot, while Section 16 explains control of weeds in general.

The CH uses pesticide products that are registered with the pesticide commission. Based on the Sekayu Estate Pesticide Usage List document for 2019-2020, it is known that the type of pesticide used is as follows:

Pesticide	Active Ingredients	Amount Used (Ltr/Kg)	1 year Active Ingredients (g)	LD50
Kencefat	Asefat	153	114.795	> 5000 mg/kg
Sidametrin	Sipermetrin	2	100	> 2000 mg/kg
Becano	Indaziflam	49	24.625	> 2000 mg/kg
Kenlon	Triklopir	592	284.160	> 2000 mg/kg
Ken Up	Glyphosate	5426	2.604.480	> 5000 mg/kg
Pamungkas	Glyphosate	30	14.208	> 5000 mg/kg
Basta	Amonium glufosinat	60	1.350	> 1730 mg/kg
Kenlly	Metil metsufuron	203	40.550	> 2000 mg/kg
Capture	Cypermeterin	1906	953.000	> 4800 mg/kg
Lifeline	Amonium glufosinat	865	242.200	> 2000 mg/kg
Marshal	Carbosulfan	2	100	> 2000 mg/kg

### 7.2.3 and 7.2.4

The CH applies an integrated pest management (IPM) by collaborating biological and chemical control. The use of chemical techniques is not carried out preventively, but based on the results of an early warning system (EWS). Biological pest control is done by applying the development of natural enemies that is owl to control the rat pest population. The development of beneficial plants such as Turnera subulata and Antigonon leptopus are also used as biological control techniques as a place to live predators for caterpillars.

Based on field observations and interviews at Sekayu Estate with the pest control officers, known that for control activities begins with census activities and marking of the main affected, then the control activities carried out the next day. In other words the CH does not implement a prophylactic use system in the use of pesticides.

Based on field observations at Betung Estate related to the application of IPM such as biological pest control by using natural predators with owl species, known that the condition of Barn Owl Box is well maintained and visible evidence of the activity of owls as found the presence of feces, fur and rat bones. In addition, beneficial plants were also found such as: Antigonon leptopus which is well maintained in every corner of the block and Turnera subulata on the main road and production road.

### 7.2.5

The CH does not use pesticides that are included in the World Health Organization Class 1A or 1B list or in the Stockholm or Rotterdam Conventions. The CH also has a complete list of pesticides belonging to the World Health Organization Class 1A or 1B listed in appendix 2 of Procedure for Sustainable Agriculture Management No. Policy 724/TQEM-SPMS/09 issued August 27, 2010. In addition, the CH also does not use pesticides with Paraquat dichloride active ingredients. This was



confirmed in the memorandum document from Head Plantations Operation with document number POD-UM-127/X/2008, 4 November 2008 concerning Recommendations to Substitute the Application of Paraquat dichloride Active Ingredients in the Minamas Environment.

Based on field observations, document verification and interviews with Betung and Sekayu Estate employees revealed that the CH no longer used pesticides with active ingredients Paraquat dichloride and pesticides that are included in the World Health Organization (WHO) Class 1A or 1B list.

#### 7.2.6

The CH has procedures for managing toxic and hazardous materials with document number 394/IT-LB3-23/11 dated September 27, 2011 which explains the classification of chemicals, responsible, providing MSDS through suppliers, how to store chemicals, handling chemicals during use, measures against leakage and spillage, first aid to training programs.

At the time of the audit activity, the CH presented a training plan document in 2020, one of which included training for pesticide applicators planned on July and October 2020. The training would be attended by foremen and spray workers. The CH shows the training documents related to the use and handling of pesticides as follows:

- Pesticide Use and Handling Training held on 10 July 2019 located at Betung Estate. The training was followed by Betung Estate spray team. Available material, attendance list and documentation of the training.
- Pesticide Use and Handling Training held on January 21, 2019 located at Sekayu Estate. The training was followed by Sekayu Estate spray team. Available material, attendance list and documentation of the training.

Based on observations and interviews with foremen and spray workers at Betung and Sekayu Estate, known that workers have understood and can explain related use of MSDS because the foreman has received MSDS introduction training. It was further explained that MSDS was always delivered during the morning briefing before the spraying work began.

#### 7.2.7

The CH has a pesticide storage procedure with document number 122/LMI/Adm-GDG/2012 dated March 1, 2012, explaining that pesticides must be stored in a safe place, separate from fertilizers, food ingredients, and water sources. In addition, the storage area is also well ventilated, not exposed to direct sunlight and rain. The CH has also increased awareness of fire hazards by providing fire extinguishers due to some flammable spray formulations.

The CH has MSDS for each type of agrochemical which explains the instructions for storage and handling of materials, handling in the event of an accident (first aid effort), hazard identification, action against spills and leaks, personal protective equipment, physical and chemical properties, reactivity and stability, Toxicological information, Ecological information, waste disposal and transportation

Based on field observations in the pesticide storage warehouse at Betung and Sekayu Estate revealed that all agrochemical materials used had MSDS, stored in a safe place, separate from other materials, and water sources. The storage area is also well ventilated, not exposed to direct sunlight and rain. The CH also provides fire extinguishers because some spray formulations are flammable. In addition, the CH has also been registered and has a pesticide storage permit by the authorized agency in accordance with the registration code stated on the agrochemical packaging.

#### 7.2.8

The company has procedures for handling pesticide waste, including:

Companies that have B3 and Non B3 Waste procedures are also presented in the following documents:

- a. SOP for B3 & Non-B3 waste management RSPO / B.5.5 / LMI number dated July 1, 2010
- b. SOP for B3 Waste Management Instructions (013 / LMI-ILPLB3 / 2010) dated December 16, 2010.
  - Wash and rinse the packaging 3 times the chemical packaging
  - Punch holes in chemical plastic packaging
  - Collect in a designated storage area
  - Coordination with collectors for recycling

The company shows the latest LB3 manifests to licensed carriers as follows:  
August 16, 2019:

- Used oil with No manifest AGU-0009267 totaling 1000 Liters
- Used B3 chemical packaging with No manifest AGU-0009270 as many as 2859 pcs
- Oil filters, diesel, Air cleaner with No manifest AGU-0009271 as many as 39 pcs
- TL lamps with No manifest AGU-0009272 as many as 3 pieces
- Used Drum with No manifest AGU-0009273 as many as 8 pieces

The B3 Waste Management Report for the period July - September 2019 was submitted on November 13, 2019 to the Kotabaru Regency Environmental Agency.

#### 7.2.9

Based on document review, known that the CH does not apply pesticides by air, this is in line with the results of interviews with employees and the surrounding community which states that the CH does not apply pesticides by air.

#### 7.2.10

The CH shows the health inspection documents for pesticide operators and employees with high levels of risk in 2020 as follows:

- Betung Factory has conducted medical check up to employees with high risk potential work conducted on January 12, 2020 by the Simpang Batu Licin Clinic. Examination of 15 employees who are generator, boiler, warehouse, laboratory, WTP and engine room operators include Cholinesterase, Audiometry, Spirometry. From the examination results known that all employees are in good health and ready to work.
- Sekayu Estate has conducted medical checks up to worker with high risk potential work conducted on January 12, 2020 by the Simpang Batu Licin Clinic. Examination of 75 employees who are generator set operators, welders, fertilizer, spray worker and warehouse clerk include Cholinesterase, Audiometry, and Spirometry. From the examination results known that all employees are in good health and ready to work.
- Betung Estate has conducted medical checks up to worker with high risk potential work conducted on January 12, 2020 by the Simpang Batu Licin Clinic. Examination of 59 employees who are generator set operators, welders, fertilizer, spray worker and warehouse clerk include Cholinesterase, Audiometry, and Spirometry. From the examination results known that all employees are in good health and ready to work.

#### 7.2.11

The CH has the following procedures governing the requirements for pesticide applicators:

- SOP of Block Spraying System with document number 066/RSPO-BSSPSS/2011 dated March 4, 2009. The procedure explains that pregnant and breastfeeding women are prohibited from engaging in Block Spraying System activities.
- Circular letter with the number 01/EM-BTE/II/16 related to the safety policy of female workers spray and fertilizer which is stated in it prohibits hiring hamiers and breastfeeding workers to carry out work related to hazardous and toxic materials such as sprays and fertilizers.

The CH has a mechanism to identify pregnant and breastfeeding workers issued by the unit manager on July 1, 2017 with the following details:

- Employees submit treatment letters to the foreman.
- A letter is brought to the assistant for treatment approval.
- Employees go to the clinic to get an examination.
- The doctor/nurse makes a pregnancy certificate (if positive).
- Letter submitted to assistant for approval.
- Assistant make a letter of job transfer/mutation from spray work.

When the audit activity takes place the CH shows a document of spray employees explaining that there are no workers under the age of 18. Based on filed observations and interviews with female workers in spray activities, known that all workers have understood the CH's policy regarding the prohibition of pregnant and breastfeeding women from working in spray activities. In addition, employees also explained that the CH does not discriminate against workers who are pregnant, breastfeeding and experiencing medical limitations, the workers will be given other jobs that are more reasonable and in accordance with their limitations.

**Status: Comply**

**7.3**
**Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.**
**7.3.1**

The company has an identification of the waste generated by plantations and factories, including:

**Estate**

Source of Waste	Waste	Type of Waste	Classification	Management
Domestic	Plastic Leftovers Paper / leaf Used lights	Solid	Non Hazardous and Toxic Substances (B3)	Collected in landfills
Workshop	Used oil Used batteries Used filter Used cotton cloth Scrap metal Used tires Paper / leaf Paint cans Oil can Grease cans	Liquid Solid	Hazardous and Toxic Substances (B3) Non Hazardous and Toxic Substances (Non B3) Hazardous and Toxic Substances (B3)	LB3 is placed in Hazardous Waste Temporary Store (TPS LB3) Whereas Non B3 is collected at landfills
Warehouse	Agrochemical packaging Used cotton cloth Paper / leaf  Plastic bag of fertilizer Sack of fertilizer	   Solid	   Hazardous and Toxic Substances (B3) Non Hazardous and Toxic Substances (Non B3) Hazardous and Toxic Substances (B3)	LB3 is placed in Hazardous Waste Temporary Store (TPS LB3) Whereas Non B3 is collected at landfills
Office	Papper/Leaf/plastck Used Lights	Solid	Non Hazardous and Toxic Substances (Non B3)	Collected in landfills

**Mill**

Waste	Type	Type of Waste	Storage
Mill liquid waste	Liquid	Non Hazardous and Toxic Substances (Non B3)	WWTP Pond
Exhaust gas emissions	Gas		-

Shell	Solid	Hazardous	Shell Station
Fiber	Solid	and Toxic	Boiler Station
EFB	Solid	Substances	EFB Station
Used tires	Solid	(B3)	Hazardous Waste Temporary Store
Used lights	Solid		Hazardous Waste Temporary Store
Used cans	Solid		Hazardous Waste Temporary Store
Boiler ash	Solid		Hazardous Waste Temporary Store
Solid	Solid		Hazardous Waste Temporary Store
Used oil	Liquid		Hazardous Waste Temporary Store
Used filter	Solid		Hazardous Waste Temporary Store
Used battery	Solid		Hazardous Waste Temporary Store
Plastic	Solid	Non	Landfill
Household waste	Solid	Hazardous	Landfill
Paper / leaf	Solid	and Toxic	Landfill
		Substances	
		(Non B3)	

The company shows a temporary storage permit for Hazardous Waste Temporary Store (TPS LB3) PT Laguna Mandiri (POM Betung) in accordance with the decision of the Regent of Kotabaru number 188.45 / 883 / KUM / 2014. Types of waste that can be stored include: Used oil, cloth rags & used gloves, used filters, used batteries, laboratory waste, electro waste, pesticide packaging, and used TL lamps. This permit is valid for 5 years from the date of stipulation December 5, 2014.

PT. LMI at the time of the audit was taking care of the extension of the permit for Hazardous Waste Temporary Store (TPS LB3). The company has submitted an application for the extension of Hazardous Waste Temporary Store (TPS LB3) to the Office of Investment and One-Stop Integrated Services (*PTSP*) of Kota Baru Regency (Letter No. 390 / LMI / UM / PSD / XI / 2019) on 21 November 2019. The Office of the Environment has verified the recommendation of the LB3 TPS permit at December 16-18, 2019 with assignment number: 094/1092 / DLH. Until the audit was conducted, there had been no progress regarding the extension of the Hazardous Waste Temporary Store (TPS LB3) permit.

PT LMI has a cooperation agreement to handle Liquid and Solid B3 Waste with PT. Sinar Bintang Albar with Letter of agreement number 117 / LMI-SBA / K3L / V / 2018 dated May 4, 2019. This cooperation agreement is valid until May 04, 2020.

for the transportation of LB3 with PT Sumber Rezeki Abadi Jaya through work order no 007 / DSN / JKT / 2019 & 008 / DSN / JKT / 2019 dated December 14, 2018. This cooperation agreement is valid until 31 December 2021.

For LB3 destroyers / beneficiaries, PT. Sinar Bintang Albar collaborates with:

1. PT. Sinar Bintang Albar with PT. Sumber Anugerah Utama through the Cooperation Agreement on the Utilization of Hazardous and Toxic Waste (B3) no: 017 / SAU / PK / II / 2019 dated February 1, 2019 and valid until February 1, 2021.
2. PT. Sinar Bintang Albar with PT. Berdikari Jaya Bersama through the Cooperation Agreement on Management of Hazardous and Toxic Waste (B3) no: 001 / SPKS-SBA / I / 2010 dated January 2, 2020 and is valid until January 02, 2021.
3. PT. Sinar Bintang Albar with PT. Karisma Jaya Mandiri through the Cooperation Agreement on Hazardous and Toxic Waste (B3) Management no: 0051 / SPK / KJM-SBA / VIII / 2019 dated August 22, 2019 and valid until August 22, 2020.
4. PT. Sinar Bintang Albar with PT. Hidup Makmur Steel through the Cooperation Agreement on Hazardous and Toxic Waste (B3) Management no: 014 / PTHMS-PTSBA / SPK / IV / 2019 dated April 2, 2019 and valid until 02 April 2020

The company shows the latest LB3 manifests to licensed carriers as follows:

August 16, 2019:

- Used oil with No manifest AGU-0009267 totaling 1000 Liters
- Used B3 chemical packaging with No manifest AGU-0009270 as many as 2859 pcs
- Filter oil, diesel, Air cleaner with No manifest AGU-0009271 as many as 39 pcs
- TL lamps with No manifest AGU-0009272 as many as 3 pieces

- Used Drum with No manifest AGU-0009273 as many as 8 pieces

### 7.3.2

Based on the SOP of B3 & Non-B3 waste management, RSPO / B.5.5 / LMI number dated July 1, 2010 explains the flow of handling waste or waste. The document has identified the type of waste / waste produced. Waste will be disposed of at the Final Disposal Site and installed the coordinate point above the landfill cover. B3 waste both liquid and solid will be placed in Hazardous Waste Temporary Store (TPS LB3). Recording of waste types and amounts recorded in the logbook and sending waste to authorized collectors and recorded in manifest.

- Data on the use of Wastewater to Land Application area

The company can show POME utilization documents to the Land Application area during the January 2019-December 2019 period for a total of 2,848 Tons. Based on the results of field visits to the land area in Estate Betung applications, block H35, known mill effluent has been applied in accordance with the procedures and regulations, there was no indication of overflow or liquid waste spilled out.

- The use of EFB fertilizer

The company uses all EFB for field application activities, while the total EFB extension application for January-December 2019 is 1,056.06 tons. Based on the results of a field visit to Blok C 25, Division 1 of Sekayu Estate, it was found that the company had carried out the EFB in the plantation area.

- The use of fiber and shells.

The company shows data on the use of fiber and shells during the January-December 2019 period with a total use of 932,491 tons of shells and 340.491 tons of fiber. Based on the results of field visits to the area it is known that the company has made use of Palm Oil Mill solid waste to be used as boiler fuel.

- Housing Domestic Waste

The company carries out domestic waste management by stockpiling at Landfill.

### 7.3.3

The company has B3 and Non B3 Waste procedures also presented in the following documents:

- SOP for B3 & Non-B3 waste management RSPO / B.5.5 / LMI number dated July 1, 2010
  - SOP for B3 Waste Management Instructions (013 / LMI-ILPLB3 / 2010) dated December 16, 2010.
- In the SOP it is explained that the resulting waste must not be burned.

At the time of the field visit at the employee housing and Final Waste Landfill, no trace of burning was found.

**Status: Comply**

## 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

The CH has procedures related to fertilization activities that are listed in the Agricultural Reference Manual with document number 110/EST-ARM/13. The procedure explains the technical aspects of fertilization, the application of empty lengths and the application of compost to immature and mature plants. Further explained related to the placement of fertilizers and the application of fertilizer by focal feeding in marginal land.

Implementation of procedures is monitored regularly with operational audits or plantation advisories. Based on field observations on fertilizing activities in Block D17-18 Sekayu Estate and Block 33 Field B12 Division 1 Betung Estate, known that fertilization workers have understood how fertilization works including how to spread fertilizer around the circle, close to the stem of the midrib and in accordance with the dose recommended.

### 7.4.2

The CH has procedures related to soil and leaf survey guidelines with document number SOP / MRC / Agro-Soil / 01 dated January 3, 2012 which explains the purpose of the soil and leaf survey is to obtain data on nutrient content in soil and leaves

through laboratory analysis. In addition, the procedure also explains soil sampling taken at depths of 0-30 cm and 30-60 cm to support fertilizer recommendations, etc.

The CH shows the documents of the Betung Estate soil sampling results with document number 291-LHU/UN8.2.1/PL/2018. Soil sampling was carried out by Lambung Mangkurat University on August 20, 2018. Soil sampling results were related to texture, nutrients C, N, P<sub>2</sub>O<sub>5</sub>, pH, Ca, Mg, Na, K, Al, Cu, Pb, Cd, Zn and others. The CH shows the results of the Sekayu Estate leaf sampling of 65 samples carried out by MRC on April 22, 2019 with report number P40 / 2019. Tests carried out on the elements Ash, P, K, Mg, Ca, N and B.

#### 7.4.3

The nutrient recycling strategy is stipulated in the organic fertilizer procedure with document number 11/LMI-BTF/SOP-K/2017, revision number 01, dated July 12, 2017 which among others explains the following matters:

- Properties and values of empty bunch, boiler ash, solid decanter, and POME.
- Empty bunch application areas, boiler ash, solid decanter, and POME.
- Application dosages of empty bunch, boiler ash, solid decanter, and POME.
- Manually apply empty bunch, mechanically empty bunch, boiler ash, solid decanter, and POME

The CH shows the application documents for liquid waste for 2019, from the documents it is known that the CH has applied liquid waste for an area of 170.80 Ha from the remaining 82.88 Ha which has not been applied. As for the empty bunch application, the CH has applied 12,672.78 tons of empty bunch throughout 2019. The CH also uses shells and fiber as boiler fuel to produce electricity, in 2019 the CH used 14,665.32 tons of shells and fiber.

#### 7.4.4

The CH shows the program and realization of fertilization based on recommendations from 2019 research, as follows:

Type of Fertilizer	Betung Estate (MT)		Sekayu Estate (MT)	
	Plan	Realization	Plan	Realization
NK-Blend	419.25	419.25	-	-
Rock Phosphate	236.72	233.86	18,662	18,688
Compound CCM 44	1,262.95	826.47	94,910	94,900
HGFB	19.93	16.93	1,244	1,250

**Status: Comply**

#### 7.5

**Practices minimise and control erosion and degradation of soils.**

##### 7.5.1

The CH has a marginal land map of each unit that informs the topography and total area, for example for Sekayu Estate on a scale of 1:50000, has a flat topography with total area of 12.71 Ha; undulating with total area 1,542.75 Ha; rolling with total area 151.79 Ha and hilly with total area 932 Ha. In addition, the CH also has a land slope map that informs the percentage of land slope and area area, for example for Betung Estate for areas with a 0-3% slope with total area 23 Ha, slope 3-8% with total area 1,512 Ha, slope 8-15% Ha with total area 121 Ha and a slope of 15-30% with total area 1,082 Ha.

##### 7.5.2 and 7.5.3

The CH has a management strategy for planting in the slope area listed in the Minamas Plantation Agricultural Reference section on land preparation. In the instructions for making terraces, the land that can be planted is slope 0°-25°, while land that has a slope of more than 25° is not allowed to be planted in order to maintain biodiversity.

The CH also has procedures related to slope protection and river buffer areas with document number 724/TQEM-SPMS/09 dated August 27, 2010 which was approved by the CEO. This procedure contains the following slope protection:

- Land in estate area with a slope of > 40% is designated as a reserve land that is cultivated or not cultivated, if there are plants and vegetation in the area then it must be maintained and recommended for planting forest plant species
- For flat areas up to slopes < 40% in the initial stages to prevent erosion and surface run off is to plant legumes.



The CH is not doing any new planting or replanting, the last replanting activity was carried out in 2017. The CH showed a record of replanting activities listed in the Work Agreement Letter number 012/Replanting/LMI-SYE/XI/2017 related to cooperation between PT Laguna Mandiri with PT. Duta Nusantara Mandiri for the work of Replanting in Sekayu Estate covering an area of 261.77 Ha. In the document explained the related treatment for the sulfur area by making a terrace with a height of 0.5 m and a stop bund length of 1/3 the width of the terrace.

**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

The CH has a marginal land map of each unit that informs the topography and total area, for example for Sekayu Estate on a scale of 1:50000, has a flat topography with total area of 12.71 Ha; undulating with total area 1,542.75 Ha; rolling with total area 151.79 Ha and hilly with total area 932 Ha. In addition, the CH also has a land slope map that informs the percentage of land slope and area area, for example for Betung Estate for areas with a 0-3% slope with total area 23 Ha, slope 3-8% with total area 1,512 Ha, slope 8-15% Ha with total area 121 Ha and a slope of 15-30% with total area 1,082 Ha.

### 7.6.2 and 7.6.3

The CH does not plant on marginal land but instead planted on an area with a certain slope. The CH has a management strategy for planting in the slope area listed in the Minamas Plantation Agricultural Reference section on land preparation. In the instructions for making terraces, the land that can be planted is slope 0<sup>0</sup>-25<sup>0</sup>, while land that has a slope of more than 25<sup>0</sup> is not allowed to be planted in order to maintain biodiversity.

The CH also has procedures related to slope protection and river buffer areas with document number 724/TQEM-SPMS/09 dated August 27, 2010 which was approved by the CEO. This procedure contains the following slope protection:

- Land in estate area with a slope of > 40% is designated as a reserve land that is cultivated or not cultivated, if there are plants and vegetation in the area then it must be maintained and recommended for planting forest plant species
- For flat areas up to slopes < 40% in the initial stages to prevent erosion and surface run off is to plant legumes.

The CH is not doing any new planting or replanting, the last replanting activity was carried out in 2017. The CH showed a record of replanting activities listed in the Work Agreement Letter number 012/Replanting/LMI-SYE/XI/2017 related to cooperation between PT Laguna Mandiri with PT. Duta Nusantara Mandiri for the work of Replanting in Sekayu Estate covering an area of 261.77 Ha. In the document explained the related treatment for the sulfur area by making a terrace with a height of 0.5 m and a stop bund length of 1/3 the width of the terrace.

**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; 7.7.2; 7.7.3; 7.7.4; 7.7.5; 7.7.6; 7.7.7

Based on the semi-detailed soil survey report conducted by the MRC team in 2011 at Betung Estate and in 2010 at Sekayu Estate, which shows soil type and soil topography, it was concluded that there was no peat area in PT Laguna Mandiri's operational area. Thus, there is no record of planting and maintaining plants and monitoring peat areas. Based on field observations at Sekayu and Betung Estate, it was found that no peat areas were found in the company's operational area.

**Status: Comply**

## 7.8

**Practices maintain the quality and availability of surface and groundwater**

### 7.8.1

Programs for the protection of water, wetlands, including river riparian are recorded in the SOP of the Buffer Zone Management (006 / RSPO-LMI / 2010). This SOP explains the determination of the planned buffer zone location as follows:

- River Riparian Area (10-15 meters)
- The area around the lake / reservoir (50 meters)
- The area around the spring (50 meters)
- The area around the main ditches is  $\geq$  1 meter wide (3-5 meters)



Based on this document, maintenance and management of buffer zone areas such as making signs, determining river riparian areas, planting trees in the buffer zone area, maintaining the area, not cutting down trees in the buffer zone area, not doing maintenance activities chemist around the area, not build a buildings around the area, not doing public bathing and washing activities around the area, installing a designated signboard for the name of the area, making a signboard prohibition and periodically monitoring the area.

The results of field observations in river riparian areas such as the Sekayu River and Walen River, it is known that the company has carried out management and maintenance of the river riparian. It is known from the condition of the river border in the form of bushes, there is a plank / signboard prohibiting the application of chemicals, and the application limit markers in the form of red paint along the  $\pm 50$  meters.

To monitor surface water quality, the Company has conducted surface water quality testing once a year in the upstream and downstream of Sungai Pinang. Referring to Government Regulation No. 82 of 2011 concerning water quality management and water pollution control, Article 13 states that water quality monitoring is carried out at least once every 6 (six) months.

### 7.8.2

Programs for the protection of water , wetlands, including river borders are recorded in the SOP of the Buffer Zone Management (006 / RSPO-LMI / 2010).

The company has also conducted surface water quality testing that is routinely carried out every 6 months, including reservoirs to meet the water needs of workers conducted by the Sucofindo Testing Laboratory that has been accredited by KAN. The test results for semester 2 of 2019 include:

#### Upstream river water

Parameter	unit	Threshold Limit Value	Result	
			Pinang River	Gimbal River
TDS	mg/l	1.000	97	103
TSS	mg/l	50	17	19
pH	Mg/l	6-9	7,62	7,4
BOD	mg/l	3	4	5
COD	mg/l	25	14	13
NO <sub>3</sub>	mg/l	10	0,26	0,74
NH <sub>3</sub> N	mg/l	-	0,08	0,09
Minyak dan Lemak	mg/l	1	< 0,2	< 0,2

Threshold limit value refer to PP RI No. 82 Tahun 2001

#### Reservoir water

Parameter	Unit	Threshold Limit Value	Result
BOD	mg/l	-	2
COD	mg/l	-	5
DO	mg/l	-	6,37
NO <sub>3</sub>	mg/l	10	< 0,11
NO <sub>2</sub>	mg/l	1	< 0,03
Minyak & Lemak	mg/l	-	< 0,2
NH <sub>3</sub>	mg/l	-	0,05
Cd	mg/l	0,005	< 0,002
Cu	mg/l	-	0,008
Pb	mg/l	0,05	< 0,01
Zn	mg/l	15	0,009
Cl	mg/l	600	4,46

SO<sub>4</sub> mg/l 400 25,63

Threshold limit value refers to the clean water quality regulation Permenkes No. 4116 / Menkes / Per / IX / 1990

Based on this document, maintenance and management of buffer zone area such as making signs, determining river riparian areas, planting trees in the buffer zone area, maintaining the area, not cutting down trees in the buffer zone area, not doing maintenance activities chemist around the area, not build a buildings around the area, not doing public bathing and washing activities around the area, installing a designated signboard for the name of the area, making a signboard prohibition and periodically monitoring the area.

Conservation Plant Enrichment in Conservation Areas: enrichment activities are carried out by planting woody plants on the river riparian area of Sekayu River and Walen River. Based on the results of tree monitoring in December 2019, the company has planted as many trees for the Sekayu Estate out of 911 seedlings planted, only 12 surviving seeds were found. As for the Betung Estate, of the 286 seedlings planted, there are 152 tree seedlings that are still alive. The types of trees planted include Jengkol, Mahogany, Tembesu, Ulin, Meranti and Jambuan.

The results of field observations in river riparian areas such as the Sekayu River and Walen River, it is known that the company has carried out management and maintenance of the river border. It is known from the condition of the river riparian in the form of bushes, there is a plank / signboard prohibiting the application of chemicals, and the application limit markers in the form of red paint along the  $\pm$  50 meters.

### 7.8.3

The company has a liquid waste treatment unit consisting of 12 ponds (2 Cooling Pond Ponds, 2 Mixing Pond Ponds, 4 Anaerobic Pond Ponds, 3 Aerobics Pond Ponds, 1 Application Pond Pool) with a total volume of 115,200 M3, with waste discharge generated 192 m<sup>3</sup> / day, then the retention time of waste treatment is 150 days.

PT LMI- Betung POM wastewater quality testing is conducted every month by an accredited laboratory. The results of testing the quality of liquid waste outlets (pond number 12) for Land Application in semester 1 of 2019 are as follows:

Parameter	unit	Result (2019)												Threshold Limit Value
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	
pH	-	7.35	7.28	8.04	7.95	4.25	6.99	6.74	7.58	7.87	7.05	7.44	7.08	6-9
BOD	mg/l	310	300	180	29	40	120	28	21	18	55	60	31	5.000

Threshold limit value refer to KepMenLH No. 28 Tahun 2003

The company has applied for an extension of the permit for the utilization of liquid waste in PT LMI's plantation land on November 21, 2019 No. Letter: 389 / LMI / UM / PSD / XI / 2019. The Office of the Environment of Kota Baru Regency has verified the application for the extension of the permit for the utilization of wastewater to the ground (Land Application) on December 12, 2019 with the verification results including the Company immediately repairing the fence at the location of monitoring well 03 (the location of community settlements) and conducting maintenance and cleaning of shrubs.

The results of field observations in the WWTP ponds and Land Application area at Blok H35 Division 2 Betung Estate, it was found that there was no flow or runoff of liquid waste to river or water sources.

### 7.8.4

The company shows data on the utilization of water in the past year as follows:

The company shows data on the utilization of water in the past year as follows:Month	FFB (Ton)	Use of Boiler Water (M3)	Process Water Usage (M3)	Amount of water usage (M3)	Average/Ton FFB

Jan-19	3.754,75	2.310	2.520	4.830	1,29
Feb-19	3.173,13	2.357	2.315	4.672	1,47
Mar-19	2.004,11	1.730	2.344	4.074	2,03
Apr-19	2.819,12	2.505	1.528	4.033	1,43
May-19	3.322,50	1.482	1.711	3.193	0,96
Jun-19	3.539,24	1.619	2.484	4.103	1,16
Jul-19	5.077,53	3.759	3.871	7.630	1,50
Aug-19	7.991,64	4.858	4.659	9.517	1,19
Sep-19	7.672,64	4.275	3.559	7.834	1,02
Oct-19	8.019,24	4.379	4.294	8.673	1,08
Nov-19	9.990,15	5.597	5.307	10.904	1,09
Dec-19	5.241,53	2.950	3.849	6.799	1,30

based on the description above, it is known that there is no water usage exceeding the budget (budget of 1.5 m<sup>3</sup> / ton TBS). The company also has a surface water extraction permit no. 503 / 1785.a / SIPA / DS-DPMPTSP / X / 2019 dated October 14 and valid until November 15, 2022.

The company shows proof of payment of water tax for the October-December 2019 period of Rp. 10,196,940; paid to the Treasurer Samsat Kota Baru District on February 7, 2020.

The results of field observations to the Water Treatment Plant, it is known that there are 2 flow meters to monitor water use for domestic and process. The flowmeter condition is still functioning well.

**Status: Comply**

## 7.9

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

### 7.9.1

The company shows records of the use of shells and fiber as boiler fuel:

Month	FFB (Ton)	Use of Shells and Fiber (Ton)	Efficient Use of Shells and Fiber (ton/FFB)
Jan-19	3.754,75	903,74	0,24
Feb-19	3.173,13	902,90	0,28
Mar-19	2.004,11	486,71	0,24
Apr-19	2.819,12	694,11	0,25
May-19	3.322,50	793,68	0,24
Jun-19	3.539,24	832,08	0,24
Jul-19	5.077,53	1.224,95	0,24
Aug-19	7.991,64	1.853,48	0,23
Sep-19	7.672,64	1.381,92	0,18
Oct-19	8.019,24	1.987,65	0,25
Nov-19	9.990,15	2.393,00	0,24
Dec-19	5.241,53	1.211,10	0,23
Average	5.217,13	1.222,11	0,24

From the above data, it is known that the average FFB though in 2019 amounted to 5,217.13 tons, the average use of shells and fiber was 1,222.11 tons with an efficiency of 0.24 tons of shells and fiber / tons of FFB.

The company also shows the following recordings of solar and electricity usage:

Month	FFB (Ton)	Electricity Consumption (kwh)	Solar Usage (liter)	Efficiency of electricity usage (liter/kwh)	Solar efficiency (Liter/Ton FFB)
Jan-19	3754,75	104.868	34.365	0,33	9,15
Feb-19	3173,13	84.388	28.903	0,34	9,11
Mar-19	2004,11	123.400	35.755	0,29	17,84
Apr-19	2819,12	115.520	32.530	0,28	11,54
May-19	3322,5	120.620	33.565	0,28	10,10
Jun-19	3539,24	116.140	32.278	0,28	9,12
Jul-19	5077,53	99.230	28.875	0,29	5,69
Aug-19	7991,64	89.200	25.165	0,28	3,15
Sep-19	7672,64	93.320	26.698	0,29	3,48
Oct-19	8019,24	87.892	25.846	0,29	3,22
Nov-19	9990,15	81.780	23.142	0,28	2,32
Dec-19	5241,53	93.128	26.552	0,29	5,07
<b>Rata-rata</b>	<b>9.923,5</b>	<b>104.128,5</b>	<b>28.815,17</b>	<b>0,28</b>	<b>3,4</b>

The average electricity consumption is 104,128.5 kwh, the average solar usage is 28,815.17 liters, the electricity consumption efficiency is 0.28 liters / kwh and the solar consumption efficiency is 3.4 Liters / ton TBS.

**Status: Comply**

#### 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

Company has conducted GHG emission calculations period 2019 make use of Calculator Palm GHG version 4.0. Accurate data has been put into the RSPO PalmGHG Calculator (Palm GHG version 4.0) and has been verified. Summary of net GHG emissions from PalmGHG calculator of the audit report which calculation option is applied for the reporting.

Summary of GHG emission for Betung POM are listed as follows :

##### Summary of Net GHG Emissions

Emmission per product	tCO2e/tProduct
CPO	3.33
PK	3.33

Description	Unit	Value
Oil palm planted on mineral soil	Ha	18,445.18
Oil palm planted area on peat	Ha	0.00
Total oil palm planted area	Ha	18,445.18
Conservation area (Forested)	Ha	411.85
Conservation area (Non-Forested)	Ha	0.00
FFB Production per hectarage	t/ha	5.05

OER	%	20.95
KER	%	4.89

#### Mill Emissions and Credits

Remarks	tCO2e	tCO2e/t FFB
<b>Emissions sources</b>		
POME	12,339.41	0.20
Fuel consumption	1,114.26	0.02
Grid electricity	0.00	0.00
<b>Credits</b>		
Export of grid electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
<b>Total</b>	<b>13,453.67</b>	<b>0.21</b>

#### Estate/Plantation field emission and Sinks

Description	Own crop		Group		3 <sup>rd</sup> party	
Emissions Sources	tCO2e	tCO2e/tFFB	tCO2e	tCO2e/tFFB	tCO2e	tCO2e/tFFB
Land conversion	78,245.08	1.30	74,910.18	27.90	0.00	0.00
CO2 emissions from fertilizer	4,275.68	0.07	5,036.94	1.88	0.00	0.00
N2O emissions from peat	0.00	0.00	0.00	0.00	0.00	0.00
N2O emissions from fertilizer	3,178.91	0.05	3,679.22	1.37	0.00	0.00
Fuel consumption	1,203.06	0.02	3,786.22	1.41	0.00	0.00
Peat oxidation	0.00	0.00	0.00	0.00	0.00	0.00
<b>Sinks</b>						
Crop sequestration	-	-0.91	-	-29.02	0.00	0.00
Sequestration in Conservation area	-827.88	-0.01	-199.27	-0.07	0.00	0.00
<b>Total</b>	<b>31,415.39</b>	<b>-0.52</b>	<b>9,293.38</b>	<b>3.46</b>	<b>0.00</b>	<b>0.00</b>

#### 7.10.2.

Based on field observation, document verification and interview with staff sighted that there are no ne development after year of 2014.

#### 7.10.3

The company has shown the sources identification of emission at PT LMI:

Source of waste and pollution	Type of waste and pollution
Land Clearing (Replanting)	CO <sub>2</sub>
Fertilization & chemical	CO <sub>2</sub> & NO <sub>2</sub>
Use of diesel fuel	CO <sub>2</sub>
The transportation	CO <sub>2</sub>
The operational of mill	CO <sub>2</sub>
POME	CH <sub>2</sub>

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

- air quality testing
- testing of emissions of boilers and generators
- noise testing
- etc

From the results of the air quality testing conducted, it is known that there are no test results that are above the thresholds. The company has managed the areas (risk of noise level) by providing PPE in the form of earplugs and earmuffs and monitoring periodically health checks for officers in these areas. This has been proven based on the results of interviews, field visits in the area and verification of health examination documents and the provision of PPE.

The company has plans to reduce greenhouse gas emissions, such as:

- Conduct preventive maintenance according to a predetermined schedule and carry out emission testing of boilers and generators.
- Utilization of solid waste (EFB) for fertilization.
- Use shells and fiber as boiler fuel
- Make efforts by forming a special team to monitor, prevent early, countermeasure and provide fire-fighting equipment, monitoring equipment and patrols for fire prevention.
- Etc.

Status: Comply

#### 7.11

**Fire is not used for preparing land and is prevented in the managed area.**

##### 7.11.1; 7.11.2 and 7.11.3

The CH shows the memorandum on Head of Plantation Upstream Indonesia on 7 August 2014 No. M-077/HPUI/VIII/2014 which explains that the CH does not burn in any form, and must implement zero burning in all Minamas plantation activities. The CH also has procedures related to land clearing carried out mechanically and not on fire listed in ARM No. Policy 110/EST-ARM/13 signed by Head of Plantation Upstream Indonesia on September 16, 2013.

The CH has compiled fire prevention and control measures listed in:

- Fire extinguisher inspection report in the factory housing area for the period of January - February 2020. Based on the inspection results known that there are 5 light fire extinguishers scattered in the housing area. Based on field observations, fire extinguisher in a ready condition for use, while in the operational area of the factory there are 25 fire extinguisher known in the operational area starting from the security guard post to the waste storage schedule warehouse.
- OHS Committee Quarterly Report of Sekayu Estate in 2019 which was sent to the South Kalimantan Provincial Manpower and Transmigration Office on January 17, 2020. From the data presented known that in the last 1 year the CH has conducted fire monitoring, simulated emergency response and no fires in operational area.

The CH always monitors fires every month on patrol by supervision and security. Monitoring is carried out at several fire-prone points such as land bordering community plantations and those directly adjacent to residential areas. In addition, monitoring is also carried out in each fire tower to monitor hotspots outside. The results of the monitoring are reported to the supervision of each estate in the land fire monitoring book.

The CH also involves the surrounding community in the following fire prevention and control measures:

- Socialization of forest and land fires with the community around the plantation and local contractors at Sekayu Estate.
- Monitoring of fire patrols with the community in January - December 2019 which explained that there were no land fires.
- Installing fire warning boards and fire bans on land clearing and Fire Danger Index (FDI).
- Fire fighting and Emergency Response simulation conducted on June 11, 2019. The training was attended by 16 employees and the surrounding community.

Status: Comply

**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**

Based on the area of the statement, it is known that there were 2007 planting areas of 133.20 hectares and 2009 areas of 54.20 hectares in Betung Estate. While the HCV identification activity was carried out by PT LMI in 2009, for this reason the company followed the Remediation and Compensation Procedures which were approved by BOG on 16 November 2015.

Sime Darby Plantation has sent a letter to the RSPO on July 15, 2015 related to the report of land clearing without HCV since Nov 2005 for all units / companies under Sime Darby / Minamas. Based on these data it is known that there has been land clearing since Nov 2005 at PT LMI with a period of:

Land Clearing	Nov 2005 – Nov 2007	Dec 2007 – Dec 2009
Sekayu	-	1.47 Ha
Betung	73.80 Ha	121.72 Ha

The company sent the Land Use Change Analysis (LUCA) document to RSPO on September 4, 2015. Based on LUCA data sent by sime Darby, it is known that:

Estate	Raw Liability (Ha)	Final Liability (Ha)
Sekayu	1.47	0
Betung	121.72	40.57

On June 26, 2016, Sime Darby Plantation sent a letter to RSPO regarding the update of raw liability data for LUCA, with the following details:

Estate	Raw Liability (Ha)	
	Nov 2005 – Nov 2007	Dec 2007 – Dec 2009
Sekayu	-	-
Betung	74	86

**7.12.2**

From ASA-4 to RC activities, it is known that there are no new land clearing activities and only replanting activities that began in 2016.

The company has conduct HCV assessment which carried out by “Yayasan Kelapa Sawit Berkelanjutan Indonesia (YASBI)” or Indonesian Sustainable Oil Palm Foundation in December 2009. Team of assessor was RSPO approved. Scope of assessment were covers PT LMI Rantau Estate, Matalok Estate, Sekayu Estate and Betung Estate. Peer review towards HCV identification assessment is presented in document No. 028/SK-YASBI/X/2012 dated October 12<sup>th</sup> 2012.

There are records of public consultation on HCV assessment on 6 December 2009 attended by South Pamukan Sub-District Head, West Pamukan Sub-District Head, North Pamukan Sub-District Head, Village Head (Sesulung Village Head, Rampak Cengal Village Head, Bepara Village Head, North Pamukan Village Head, Betung Village Head, Bakau Village, BPD, and representatives of the Pamukan and Sungai Durian plantation.

The company shows Minutes of Agreement related to the management of HCV in Betung Estate and Sekayu Estate between representatives of companies and surrounding community that have rights in the HCV area of Company on 8 March 2017 at the Sekayu Estate Office, with the agreement as follows:

- Local communities do not agree to the collective management of HCV areas that overlap with the rights of the community because the area has become a land of income for the community.
- The company will submit HCV area that overlapping to the public to fully managed by community.
- With the agreement, then Betung Estate and Sekayu Estate will release it from the HCV area that managed by company.

Location (Blocks)	Area (ha)	Remarks	Land Control (ha)	
			Company	Community



<b>Betung Estate</b>				
K38-K40	46.68	Wetland		<b>46.68</b>
E29/30, J27-J31, D36-38, C36-38, E35-36 and F36-36	193.88*	Natural vegetation		<b>193.88</b>
D32-D33, E7, H38, I38, J38 and J41	74.31	Riparian zone of Sekayu River		<b>74.31</b>
J26-J30	28.09	Riparian zone of Pinang River		<b>28.09</b>
B36, C36, D36 and D37	38.50	Riparian zone of Walen River		<b>38.50</b>
I29 and I30	12.42	Riparian zone of Enten River		<b>12.42</b>
C37, J40 and K33	3.72	Buffer zone of Betung Basin		<b>3.72</b>
F36	2.00*	Basin		<b>2.00</b>
<b>Sub Total HCV Betung Estate</b>			<b>205.72</b>	<b>399.60</b>
<b>Sekayu Estate</b>				
D27, D28, E29 and E30	30.50	Riparian zone of Sekayu River	<b>30.50</b>	
G13	0.25	Riparian zone of Tamerung River	<b>0.25</b>	
D26-D27, E26-E28, F27-F29, G29 and H29	63.10	Riparian zone of Enten River	<b>42.52</b>	<b>20.58</b>
C15-C17, D14-D17, E17-E18 and F19	50.42	Riparian zone of Kulum River	<b>10.05</b>	<b>40.37</b>
F26, D28, G15, G32 and I08	5.78	Buffer zone of Sekayu Basin	<b>5.78</b>	
G17	0.50	Gua Batu Spring.		<b>0.50</b>
B21, C/D16, E26/27, H29/30 and G25/26	80.38*	Secondary forest		<b>80.38</b>
G14-G16	45.00	Buffer zone of Gua Batu Spring area		<b>45.00</b>
<b>Sub Total HCV Sekayu Estate*</b>			<b>89.10</b>	<b>186.88</b>
<b>Grand Total</b>			<b>89.10</b>	<b>586.48</b>

Note: \* Identified as HCV area. The area that stated as HCV only in Sekayu Estate. Therefore, the HCV area in Betung Estate are overlapped with planted area.

HCV study has identified wildlife in PT LMI with its status according to IUCN, CITES and Government Regulation (PP) No. 7 year 1999. There was identified totaling 23 species of mamals, 48 species of aves and 9 species of reptiles. From those wildlidfe mentioned, 17 mamals, 10 aves and 3 reptiles were listed in IUCN, CITES and PP No. 7 year 1999. There is no wildlife categorized as critically endangered which mentioned in IUCN redlist data book 2009.

At present the company determines that the HCV area managed by the Company is on the river riparian area with a total area of 90.31 Ha consisting of 88.88 Ha in Sekayu Estate and 1.43 Ha in Betung Estate.

### 7.12.3

In the SEIA document, it was stated that PT. Laguna Mandiri in terms of land cover consists of mixed plantations and settlements (13.9%), secondary forests 67.9%, shrubs 15.4%, fields 0.7% and swamp forests 2.1% with a study area coverage of 21,400 Ha.

Based on the description above, PT. LMI does not come from areas that have high forest cover.

### 7.12.4 & 7.12.5

From ASA-4 to RC activities, it is known that there are no new land clearing activities and only replanting activities that began in 2016.

**7.12.6**

The company has an Environmental and Biodiversity Policy, where the company is committed to:

- Comply with and implement Government Laws and Regulations relating to the environment and biodiversity.
- Create, maintain and continuously improve the Sustainable Plantation Management System both internally and externally
- Prevent negative impacts that can harm the environment and biodiversity as a result of plantation activities
- Educate and increase the awareness of relevant parties through training on awareness of environmental preservation and biodiversity.

The company has also conducted socialization related to the HCV monitoring program to employees and surrounding communities. The socialization to the community was carried out on February 3, 2020 as follows:

- The Sekayu Baru Village community was attended by 12 people
- The Village of Bepara was attended by 20 people

Whereas the socialization to employees was carried out on February 3, 2020, which was attended by 46 employees from the Sekayu Estate Division I.

Based on the results of HCV diareal field visits such as Walen and Sekayu river riparian, it is known that the company has managed the conservation / HCV area such as:

- There is already a conservation area / HCV signboard
- There are signboards for hunting bans, prohibitions on damaging HCV areas and chemical applications.
- The results of field observations revealed that the condition of the river riparian area is left natural in the form of bushes, there is a plank / signboard prohibiting the application of chemicals, and a limit marking the application of chemicals in the form of red paint along  $\pm$  50 meters.
- Observe / monitor flora and fauna.
- Etc.

Based on the HCV Assessment document, it is known that there are 493 flora throughout PT LMI, but there are no protected species. As for animals, throughout PT LMI there are protected animals according to IUCN, CITES and PP No. 7 of 1999, namely 17 species of mammals, 10 species of birds and 3 types of reptiles.

The company also monitors flora and fauna every month, such as:

- Monitoring of animal encounters in the Sekayu estate on 4 November 2019 in Division 2 block H26, 27 and 28 found finches (10 heads), lathe (4 heads), turtles (4 heads), teruwok (12 heads), monkeys (15 individuals), monitor lizards (5 individuals), water snakes (1 individual), Bulus (2 individuals).
- Monitoring on December 6, 2019 in block B 20/21 in Sekayu estate, flora is still found with Laban, bendo, bamboo, ketapang, thatch, keris and mechania types.

The company shows proof of sending the HCV report of PT. Laguna Mandiri to the South Kalimantan Province BKSDA through PT. Pos Indonesia on July 24, 2019 with receipt number 14077556786.

**7.12.7**

From ASA-4 to RC activities, it is known that there are no new land clearing activities and only replanting activities that began in 2016.

**7.12.8**

- The Chronology of LUCA submission by SDP update is available until January 2019 where the company has sent LUCA reports to the RSPO (19 reports) along with shapefiles in August 2018, in October 2018 the RSPO has responded with a note requiring clarification. Based on PT MAL's communication with the RSPO on February 13, 2019, the RSPO stated that currently the LUCA status for PT LMI is still awaiting finalization and clarification from SDP Berhad.
- Land use / cover change analysis (LUCC) reporting checklist from the RSPO dated 9 August 2019 is known that there are still data that need to be clarified, including:

- I. Provide missing satellite imageries, land cover and vegetation coefficient shapefiles for all 4 estates that cover all 2005, 2007 and 2009 years.
- II. Provide substitute satellite imageries for the no-data gaps and artifacts that are observed to be present for all the imageries.
- III. Provide the RSPO Remediation and Compensation Liabilities Report PT BSS V1 report for reviewers to reference the calculation and validity of the satellite imageries used.

Based on the description above, the Company has not been able to show evidence of data clarification above and the approval of the Land Use Change Analysis (LUCA). **It was raised as nonconformity number 2020.05.**

**Critical  
7.12.8**

**Status: Non conformity No 2020.05**

**3.2 Conformity Checklist of Certificate and Trademark Use** *(Only apply for Surveillance Assessment Report)*

1.	Evidence of permission or approval certificate and trademark from Certification Body which submitted by Client	X or√
ASA-1.1	PT Laguna Mandiri (Sime Darby Plantation Bhd) do not use RSPO trademark and CB Logo. Trademark License Number of Sime Darby Plantation Bhd is "RSPO-1106024" Can be seen at: <a href="https://www.rspo.org/trademark/current-licensees">https://www.rspo.org/trademark/current-licensees</a>	√
	<b>Status: Comply</b>	
2.	Implementation of certificate and trademark used by Client comply with size and type (shape) against Guideline of trademark Use	X or√
ASA-1.1	PT Laguna Mandiri (Sime Darby Plantation Bhd) do not use RSPO trademark and CB Logo. Trademark License Number of Sime Darby Plantation Bhd is "RSPO-1106024" Can be seen at: <a href="https://www.rspo.org/trademark/current-licensees">https://www.rspo.org/trademark/current-licensees</a>	√
	<b>Status: Comply</b>	
3.	Implementation of Certificate and Trademark is not used on product	X or√
ASA-1.1	PT Laguna Mandiri (Sime Darby Plantation Bhd) do not use RSPO trademark and CB Logo. Trademark License Number of Sime Darby Plantation Bhd is "RSPO-1106024" Can be seen at: <a href="https://www.rspo.org/trademark/current-licensees">https://www.rspo.org/trademark/current-licensees</a>	√
	<b>Status: Comply</b>	
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.	X or√
ASA-1.1	PT Laguna Mandiri (Sime Darby Plantation Bhd) do not use RSPO trademark and CB Logo. Trademark License Number of Sime Darby Plantation Bhd is "RSPO-1106024" Can be seen at: <a href="https://www.rspo.org/trademark/current-licensees">https://www.rspo.org/trademark/current-licensees</a>	√
	<b>Status: Comply</b>	

### 3.3 Summary of RSPO Partial Certification.

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

Sime Darby Plantation Bhd Time Bound Plan is explained in table section 1.10. Sime Darby has achieved 34 management units in Malaysia and 24 Management Units in Indonesia that RSPO certified. Total management unit in Sime Darby Plantation Bhd are 34 in Malaysia, 25 in Indonesia and 1 in Liberia. Sime Darby Plantation Bhd has informed the Time Bound Plan progress through representative's office in Indonesia. MUTU has considered that Sime Darby Plantation Bhd is comply with the RSPO requirement for Time Bound Plan. The Time Bound Plan was revised and declared by the Sime Darby Plantation Bhd Indonesian representative on January 2019 by the Head of PSQM.

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

MUTU Auditor has verified company partial certification and concludes that:

- There are significant land conflicts in PT Mitra Austral Sejahtera, there is still an issue that remains unresolved social i.e. from Serikat Petani Kelapa Sawit (SPKS), but improvements are ongoing.
- PT Budidaya Agro Lestari waiting for land title process to some of its operational area.
- PT Guthrie Pecconina Indonesia – Sungai Jernih Estate currently is in HGU process
- The company has followed RSPO requirement related to New Planting Procedure and Remediation and Compensation Procedure.
- There is no labor 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?	<p><b>Company Group/Holding Statement:</b> Companies are already doing internal audits. There are internal audit reports for each company, latest partial internal audit held in July – December 2018, for five units and three smallholder scheme.</p> <p><b>Auditor Verification:</b> Internal Audit report available for uncertified management unit, latest partial internal audit is held in July – December 2018, for five units and three smallholder scheme.</p> <ul style="list-style-type: none"> <li>- PT Budidaya Agro Lestari : 2 April 2018</li> <li>- PT Guthrie Pecconina Indonesia – Sungai Jernih Estate : 8 Aug. 2018</li> </ul> <p>PT Sandika Natapalma – Karya Palma Estate : 10 July 2018</p>
2.1.2	No replacement after dates defined in NIs Criterion 7.3 of: <ul style="list-style-type: none"> <li>• Primary forest.</li> </ul>	<p><b>Company Group/Holding Statement:</b> HCV assessment has been conducted for uncertified units i.e. PT Mitra Austral Sejahtera (by Aksenta in March 2009) and Sime Darby</p>

	<ul style="list-style-type: none"> <li>Any area identified as containing High Conservation Values (HCVs).</li> <li>Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3.</li> </ul>	<p>Plantation Liberia operations (by RSPO approved assessors – Dr SK Yap in 2011).</p> <p><b>Auditor Verification:</b> Sime Darby Plantation Bhd sent disclosure of liability including LUCA analysis to RSPO Secretariat on 2 December 2014 and 2<sup>nd</sup> revision on 24 June 2016. Current status of LUCA report of SDP Bhd is having been sent the 19 report of LUCA to RSPO on Aug 2018, responded by RSPO with need clarification. The companies ensuring reporting of disclosure of liability progress to RSPO and according to the CB's correspondence with RSPO Remediation and Compensation.</p>
2.1.3	Any new plantings since January 1 <sup>st</sup> 2010 must comply with the RSPO New Plantings Procedure.	<p><b>Company Group/Holding Statement:</b> A new mill will be set up in Liberia and planned for commissioning in February 2016. Preparation to undergo the RSPO Certification process is in progress and SDP targets to undergo RSPO Certification by end 2017. RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps is in progress. *Note: RSPO NPP Announcements for SDP can be found at <a href="http://www.rspo.org/certification/new-planting-procedures/public-consultations/page/14">http://www.rspo.org/certification/new-planting-procedures/public-consultations/page/14</a></p> <p><b>Auditor Verification:</b></p> <ul style="list-style-type: none"> <li>Karya Palma Estate (PT Sandika Natapalma) and Baturus Estate (PT Budidaya Agro Lestari) any new planting after January 1<sup>st</sup> 2010 and due to not conduct NPP.</li> </ul> <p>RSPO NPP process has been completed in 2011 for a new mill in Liberia.</p>
2.1.4	Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	<p><b>Company Group/Holding Statement:</b> Sime Darby (Liberia) Plantation Inc. Status: Box G - Close for Monitoring Further details please refer to: <a href="http://www.rspo.org/members/complaints/status-of-complaints/view/46">http://www.rspo.org/members/complaints/status-of-complaints/view/46</a></p> <p><b>Auditor Verification:</b> Auditor has verified the supporting evidence of above the company statement. There are land conflict in: PT Bina Sains Cemerlang, this issue was raised on 22 April 2017 and still being process to resolve.</p>



2.1.5	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	<p><i>Company Group/Holding Statement:</i> No stakeholder comments or complaints received.</p> <p><i>Auditor Verification:</i> Auditor has verified the supporting evidence of above the company statement. There are no labour dispute in company unit.</p>
2.1.6	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	<p><i>Company Group/Holding Statement:</i> None noted. No stakeholder comments or complaints received.</p> <p><i>Auditor Verification:</i> Auditor has verified the supporting evidence of above the company statement. There is any legal non-compliance for company under SDP waiting for land title process, i.e.:</p> <ul style="list-style-type: none"> <li>• PT Sime Indo Agro 1,652 Ha</li> <li>• PT Aneka Inti Persada 421.31 Ha</li> <li>• PT Bina Sains Cemerlang 308.25 Ha</li> <li>• PT Bersama Sejahtera Sakti 765 Ha</li> <li>• PT Langgeng Muaramakmur 1,162 Ha</li> <li>• PT Paripurna Swakarsa 1,120 Ha</li> <li>• PT Swadaya Andika 63 Ha</li> <li>• PT Bahari Gembira Ria 1,639 Ha</li> <li>• PT Guthrie Pecconina Indonesia 4,133 Ha</li> <li>• PT Perkasa Subur Sakti 1,286 Ha</li> </ul>

**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 ASA-1.1**

<i>NCR No.</i>	:	2020.01	<i>Issued by</i>	:	Trismadi N
<i>Date Issued</i>	:	13 March 2020	<i>Time Limit</i>	:	12 June 2020
<i>NC Grade</i>	:	Critical	<i>Date of Closing</i>	:	30 April 2020
<i>Standard Ref. &amp; Requirement</i>	:	<b>3.4.3</b> <b>The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</b>			
<i>Non-Conformance Description &amp; Evidence observed (filled by auditor):</i> The company shows a report on the implementation of RKL / RPL Semester I Year 2019 with the parameters monitored, including: <ul style="list-style-type: none"><li>- Microclimate,</li><li>- Air quality,</li><li>- noise,</li><li>- Spatial Planning and Land,</li><li>- Soil,</li><li>- Hydrology,</li><li>- Water quality,</li><li>- Social Economy,</li><li>- Community perception,</li><li>- Security and public order and</li><li>- Public health</li></ul> But there is no trend evaluation, critical level evaluation, and compliance level evaluation.					
<b>Non-Conformance Description</b> (filled by auditor): Company has not been able to show that the evaluation and preparation of the RKL / RPL implementation report is in accordance with KepMenLH No. 45 of 2005.					
<b>Root Cause Analysis</b> (filled by organization audited): Trend evaluation, critical level evaluation, and compliance level evaluation are not yet included in the RKL RPL report because the PIC (BTF) of RKL RPL preparation is missed in the report content. This is because the Drafting Team of BTF does not yet understand about making evaluations contained in KepmenLH No. 45 of 2005 so that in the RKL RPL report there has not been a trend evaluation, critical point evaluation and compliance evaluation.					
<b>Correction</b> (filled by organization audited): After the Team studied and read KepmenLh No. 45 of 2005 and understood the guidelines, then further improvements were made in the RKL RPL report for the second semester of 2019 by adding trend evaluation, critical level evaluation and compliance evaluation by the BTF team.					
<b>Corrective Action</b> (filled by organization audited): PIC will coordinate with Sustainability staff after the draft RKL RPL is completed so that they can review trends, evaluate critical levels, and evaluate compliance levels in the contents of the RKL RRL before being sent to the relevant office. Furthermore, RKL RPL will be prepared by including trend evaluation, critical level evaluation and compliance evaluation by the BTF team every semester by comparing the results of data analysis every semester scheduled to be compiled at least 2 months after the end of the semester by comparing the results of the previous semester's analysis and also the standards contained in the rules. Training on the preparation of RPL RKL in accordance with these regulations was carried out on April 16, 2020. The documents are attached.					

**Assessor Evaluation and Conclusion (filled by auditor):**
**Verification, 13 April 2020.**

The company has presented the Report of the Implementation of RKL-RPL Semester II of 2019 which contains an evaluation of trends, critical levels and compliance and there have been management efforts undertaken by the company against the results of monitoring that exceed the established quality standards. For example:

- Evaluation of trends regarding the results of noise quality monitoring, when compared between semester 1 and 2 of 2019. Noise in Boiler Stations, engine rooms, nuts & kernels, and clarification is relatively declining. This is because the activities have taken preventive measures in the form of routine maintenance of the machines.

**Verification, 21 April 2020.**

The company has sent the RKL RPL report for semester 2 of 2019 which contains an evaluation of trends, critical levels and compliance and there have been management efforts undertaken by the company on the results of monitoring that have passed the quality standards that have been set to the Environmental Service Office of Kota Baru Regency, South Kalimantan Province on April 13, 2020 (JNE Receipt 111530000393520).

**Verification, 30 April 2020.**

The company has sent the minutes of the RKL RPL preparation activity which was conducted on April 18, 2020 and was participated by 8 participants. The material provided included the affirmation of the PIC related to RPL RPL reporting and an understanding of the preparation of RKL RPL in accordance with KepmenLH No. 45 of 2005 concerning Guidelines for the Preparation of RKL RPL.

**Auditor Conclusion:**

Based on the corrective efforts sent by the Company, this nonconformity has been closed.

<b>Verified by</b>	<b>: Trismadi N</b>
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<b>NCR No.</b>	<b>: 2020.02</b>	<b>Issued by</b>	<b>: Trismadi N</b>
<b>Date Issued</b>	<b>: 13 March 2020</b>	<b>Time Limit</b>	<b>: Next Surveillance</b>
<b>NC Grade</b>	<b>: Non Critical</b>	<b>Date of Closing</b>	<b>:</b>
<b>Standard Ref. &amp; Requirement</b>	<b>: 3.5.2 Employment procedures are implemented and records are maintained</b>		

**Evidence observed (filled by auditor):**

During the audit activity, the following information were obtained:

1. Collective Labour Agreement (CLA) article 14 states that a specific time agreement worker (PKWT) can be carried out by the company for certain types of work performed in accordance to Manpower Minister regulation, and also make standardizes certain PKWT to be treated equally in the unit. Regarding this matter the company showing Inter-Office Mail number 085/RSPO-i2/XI/2016 dated 11 November 2016 and Inter-Office Mail number 017/HRM-i5/I/2019 dated 25 January 2019 about specific time agreement workers, explained that the use of PKWT is intended for harvester during the peak harvest season, and the appointment and extension of the PKWT contract refer to the applicable laws and regulations.
2. Based on document verification sighted that there are 59 PKWT in SYE, consisting 40 harvester, 3 harvesting clerk, and others workers.
3. Based on document verification sighted that there are 77 PKWT in BTE, consisting 12 pruning, 2 teacher, 6 upkeep, 6 manuring and others workers.
4. Agreement number 003/LMI/PPK-PKWT/IX/2019 between PT LMI (SYE) with E.T.D (harvester) period from 21 September 2019 until 17 September 2021.
5. Agreement number 021/BTE-EM/SPKI/2020/PKWT between PT LMI (BTE) with S.S.T (harvester) period

from 2 January 2020 until 30 June 2020. 6. Agreement number 013/SYE-PKWT/XI/2018 between PT LMI (SYE) with A.S.R (harvester) period from 14 November 2019 until 14 November 2020.	
<b>Non-Conformance Description</b> <i>(filled by auditor):</i> The certification unit has not been fully consistent in implementing the established human resources management procedures that the using of PKWT is intended for harvester during the peak harvest season, and the appointment and extension of the PKWT contract refer to the applicable laws and regulations.	
<b>Root Cause Analysis</b> <i>(filled by organization audited):</i>	
<b>Correction</b> <i>(filled by organization audited):</i>	
<b>Corrective Action</b> <i>(filled by organization audited):</i>	
<b>Assessor Evaluation and Conclusion</b> <i>(filled by auditor):</i>	
<b>Verified by</b> :	

<b>Date Issued</b> :	<b>2020.03</b>	<b>Issued by</b> :	<b>Trismadi N</b>
<b>NC Grade</b> :	<b>13 March 2020</b>	<b>Time Limit</b> :	<b>12 June 2020</b>
<b>Standard Ref. &amp; Requirement</b> :	<b>Critical</b>	<b>Date of Closing</b> :	<b>23 April 2020</b>
<b>Date Issued</b> :	<b>3.7.1</b> <b>A documented programme that provides training is in place, which is accessible to all staff, workers, scheme smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&amp;C, in a form they understand, and which includes assessments of training</b>		
<b>Evidence observed</b> <i>(filled by auditor):</i> <ol style="list-style-type: none"> <li>The certification unit showing training program in SYE, BTE, and BTF year of 2019 and 2020. However the training program not identify about training need for grabber operator.</li> <li>Minute of handover of good with number 109/STB/PJT/XII/2019 from PT Bina Pertiwi concerning the delivery of Kubota Farm tractor MX5100/S3, Grabber and accessories on 19 January 2020.</li> <li>Based on field observation sighted that company has 7 unit tractor. Based on interview with operator sighted that 4 operator doesn't have OHS license.</li> <li>Letter number 01/ESH KSP-Training K3/II/2020 dated 10 February 2020 about submission of training for heavy equipment operators, generators, water machines for Kalimantan Selatan Pulau Laut (KSP) year of 2020. The document explains that there are 4 operators to be included in the training plan. The document has also been approved by Regional CEO KSP.</li> <li>The BTF shows the OHS program on 1 January 2019, including: PPE application, OHS meeting routines, check the cleanliness of the cottage &amp; public facilities, and OHS simulation.</li> </ol>			
<b>Non-Conformance Description</b> <i>(filled by auditor):</i> The certification unit has not been able to show evidence that the identification training needs comprehensive for all employees and operators.			
<b>Root Cause Analysis</b> <i>(filled by organization audited):</i> <ul style="list-style-type: none"> <li>The training program doesn't cover all employees, it cause the device has just come to the unit. So that</li> </ul>			

<p>training need have no been identified for employees. Lack of understanding the RSPO officer from the mill during audit activities.</p>	
<p><b>Correction</b> <i>(filled by organization audited):</i></p> <ul style="list-style-type: none"> <li>Revising employee training needs covering all employees on the mill and estates.</li> </ul> <p>Cooperation with OHS training provider for the four operators on 20 July 2020.</p>	
<p><b>Corrective Action</b> <i>(filled by organization audited):</i></p> <ul style="list-style-type: none"> <li>Sustainability &amp; Quality Management (SQM) staff and management unit always coordination with the mechanization department regarding new tools/heavy equipments will be used in the unit a month before unit presence, so that identification and submission of training for employees can be carried out properly.</li> </ul>	
<p><b>Assessor Evaluation and Conclusion</b> <i>(filled by auditor):</i></p> <p><b>Verification on 15 April 2020,</b> The certification unit was shown revised of training program, such as:</p> <ul style="list-style-type: none"> <li>- SCCS training</li> <li>- Grading training</li> <li>- Processing training</li> <li>- Maintenance training</li> <li>- Laboratory analysis</li> <li>- HIRAC training</li> <li>- First aid training</li> <li>- Emergency response preparedness training</li> <li>- OHS training</li> <li>- Operator license</li> <li>- Best management practices training</li> </ul> <p>However the certification unit has not been show the operator license training. This nonconformity is still not comply.</p>	
<p><b>Verification on 23 April 2020</b> The certification unit showing several evidences:</p> <ul style="list-style-type: none"> <li>- Operator license training schedule signed by CEO PT Kautsar Inti Prima dated 6 April 2020</li> <li>- Training will be conducted on 22 – 23 June 2020 in Kotabaru City with members: 60 operator including three operator from SYE and one operator from BTE.</li> </ul>	
<p><b>Auditor Conclusion:</b> Based on the explanation above, the non-conformity is stated to have been fulfilled with observation and will be verified again during the next surveillance.</p>	
<b>Verified by</b>	<b>: Trismadi N</b>

<b>NCR No.</b>	<b>: 2020.04</b>	<b>Issued by</b>	<b>: Brigitta Prita</b>
<b>Date Issued</b>	<b>: 13 March 2020</b>	<b>Time Limit</b>	<b>: 12 June 2020</b>
<b>NC Grade</b>	<b>: Critical</b>	<b>Date of Closing</b>	<b>: 4 June 2020</b>
<b>Standard Ref. &amp; Requirement</b>	<p><b>3.8.12. Record Keeping</b></p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to</p>		


- confirm the certified status of raw materials or products held in stock.
- iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.
- iv) For Mass Balance Module, the mill:
- shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.
  - All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.
  - The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).

### Evidence observed (filled by auditor):

Based on RSPO IT Platform (palm trace) data on March 12, 2020 it is known that:

- CSPK certified volume sebesar 4,498 MT.
- CSPO certified volume sebesar 18,893 MT.
- Volume allocated as credits 7,093 MT.
- Volume sold as physical CSPK of 2,289.40 MT
- Volume sold as physical CSPO of 5,088.86 MT
- Remaining certified volume for CSPK of 2,537.50 MT, should **2,208.60 MT**.
- Remaining certified volume for CSPO of **6,711.14 MT** (7,093 MT + 5,088.86 MT).

palmtree.rspo.org/Octopus/viewCertificates.action



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CB A

Stock Overview

Member Information		License Information	
Member Name	PT Laguna Mandiri	License ID	CB87419
Member ID	RSPO_PO1000001380	Issued By	PT Mutuagung Lestari
Member Country	INDONESIA	Issued On	02-07-2019
Member Category	Oil Mill	Start Date	01-07-2019
Core Product	Palm Oil	End Date	31-09-2020
		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	IP	4,498	0	0	2,289.4	0	0	2,537.5
CSPO	IP	18,893	0	7,093	5,088.86	0	0	6,711.14
FFB_estates	IP	89,969	0	0	0	0	0	89,969

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

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### Non-Conformance Description:

Based on the explanation above, unit management has not been able to show evidence of remaining CSPK remaining volume of 2,208.60 MT (Difference 328.9 MT) on the RSPO IT Platform data.

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

There is a difference in CSPK volume because there are 2 volume transactions before and after reverse appearing in Trading and Stock.



Transaction ID	Seller	Buyer	Product	Supply Chain Model	Volume*	Transaction Type	Status	B/L Number	Shipping/BL Date
TR-ceb49ca8-5490	PT. Laguna Mandiri	PT. Laguna Mandiri - Rantau Kernel Crushing Plant	CSPK	Mass Balance	596.1	Shipping	Confirmed		30-11-2019
TR-6c31f2a9-4a1b	PT. Laguna Mandiri	PT. Laguna Mandiri - Rantau Kernel Crushing Plant	CSPK	Mass Balance	328.9	Shipping	Confirmed		30-09-2019
TR-502874ab-e17c	PT. Laguna Mandiri	PT. Laguna Mandiri - Rantau Kernel Crushing Plant	CSPK	Mass Balance	400.89	Shipping	Confirmed		31-08-2019
TR-724c6164-26fd	PT. Laguna Mandiri	PT. Laguna Mandiri - Rantau Kernel Crushing Plant	CSPK	Segregation	596.1	Shipping	Reversed		30-11-2019
TR-c4e8de1f-5e26	PT. Laguna Mandiri	PT. Laguna Mandiri - Rantau Kernel Crushing Plant	CSPK	Segregation	328.9	Shipping	Reversed	001	30-09-2019
TR-d5e7263f-bd90	PT. Laguna Mandiri	PT. Laguna Mandiri - Rantau Kernel Crushing Plant	CSPK	Segregation	400.89	Shipping	Reversed		31-08-2019

And both have been announced and confirmed by the Buyer. So that the total remaining stock volume is excess.

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

SQM Jakarta coordinates with the RSPO-IT Palm trace to adjust the total remaining stock volume with the actual manual calculation so that there is no difference in the remaining total stock volume. Resubmit the palm trace data that is in accordance with the actual (not the difference) to the auditor team (attached document).

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

The SQM unit is given an account to check the actual sales data and the actual CSPK stock in accordance with that contained in the RSPO palm trace data at the time of the RSPO internal audit.

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

**Verification, June 03, 2020.**

The company shows an email on May 8, 2020 to UTZ Palm Oil Support with details:

Dear Huzaifa,

Please be informed that this have been dragged for some time and we need to close the Non- Conformity raised by CB.

3 transactions have been as SG CSPK and reserved on 11 Mar 2020. All are ok till 12 March 2020 with volume in trading stock = 2290.40. However on 13 March 2020, the volume in trading stock was changed to 1960.5

Hope you can advise, what was went wrong with transactions [TR-c4e8de1f-5e26](#) and [TR-6c31f2a9-4a1b](#) which = 328.90.

No	Transaction ID	Volume	Creation Date	Confirmation Date	Reverse date	Retrieval Date from Palm Trace	Volume in Trading & Stock
1	<a href="#">TR-724c6164-26fd</a>	596.1	4-Dec-19	19-Dec-19	11-Mar-20	12-Mar-20	2289.4
2	<a href="#">TR-c4e8de1f-5e26</a>	328.9	9-Oct-19	23-Oct-19			
3	<a href="#">TR-d5e7263f-bd90</a>	400.89	5-Sep-19	17-Sep-19			
4	<a href="#">TR-ceb49ca8-5490</a>	596.1	11-Mar-20	11-Mar-20		13-Mar-20	1960.5
5	<a href="#">TR-6c31f2a9-4a1b</a>	328.9	11-Mar-20	11-Mar-20			
6	<a href="#">TR-502874ab-e17c</a>	400.89	11-Mar-20	11-Mar-20			

We can have a con-call if further clarification is needed.

There is an email reply from Palm Oil Support UTZ (Palmoil.support@utz.org) dated June 1, 2020 which informs: "Please be informed that we have checked with our team and identified that was an error on the system. We will rectifying the issue and try to permanently address this issue".

Based on the Palm Trace date on June 03, 2020 its known:

RSPO CSPK Trading.

Transaction ID	Transaction Date	Product	Volume (MT)	Status	License
TR-8e99d260-f755	04/07/2019	CSPK	39.69	IP	Active CB87419
TR-a685f8ed-19fe	12/08/2019	CSPK	305.78	SG	Active CB87419
TR-4b944881-4889	07/01/2020	CSPK	349.72	MB	Active CB87419
TR-bed5eeda-fb46	28/02/2020	CSPK	268.32	MB	Active CB87419
TR-502874ab-e17c	11/03/2020	CSPK	400.89	MB	Active CB87419
TR-6c31f2a9-4a1b	11/03/2020	CSPK	328.9	MB	Active CB87419
TR-ceb49ca8-5490	11/03/2020	CSPK	596.1	MB	Active CB87419
TR-864429a2-7344	20/04/2020	CSPK	131.26	MB	Active CB87419
TR-a74f1551-09f8	20/04/2020	CSPK	224.62	MB	Active CB87419
<b>Total</b>			<b>2,645.28</b>		

Based on stock overview data on the palm trace date on June 3, 2020, it is known:

Stock Overview								
Member Information				License Information				
Member Name	PT. Laguna Mandiri			License ID	CB87419			
Member ID	RSPO_PO1000001380			Issued By	PT Mutuagung Lestari			
Member Country	INDONESIA			Issued On	02-07-2019			
Member Category	Oil Mill			Start Date	01-07-2019			
Core Product	Palm Oil			End Date	30-06-2020			
				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	IP	4,498	117.94	0	2,645.28	0	0	2,063.68
CSPO	IP	18,893	0	7,093	5,088.86	0	0	6,711.14
FFB_estates	IP	89,969	0	0	0	0	0	89,969

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

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Based on data above it is known that:

- Certified volume of CSPK of 4,498 MT.
- Sold as physical volume of CSPK is 2,645.28 MT.
- Announced volume of CSPK of 117.94 MT.
- Remaining certified volume of CSPK of **2,063.68 MT**
- Remaining certified volume of CSPK should be (4,498 MT - 2,645.28 MT - 117.94 MT = **1,734.78 MT**).

Based on the explanation above, there are still differences regarding the remaining volume of CSPK certified.

### Verivication, June 04, 2020.

Based on the company's explanation, it is known that there was a system error where CSPK transactions with ID number TR-6c31f2a9-4a1b of **328.9 MT** were not written off in the Palm Trace system so that the remaining certified volume of CSPK did not change / decrease.

The communication results with the Palm Oil Support UTZ ([Palmoil.support@utz.org](mailto:Palmoil.support@utz.org)) on June 1, 2020 which informed:

*"Please be informed that we have checked with our team and identified that was an error on the system. We will rectifying the issue and try to permanently address this issue".*

Based on the explanation above, the non-conformity is stated to have been fulfilled with observation and will be verified again during the next surveillance.

<b>Verified by</b>	<b>:</b>	<b>Brigitta Prita</b>
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NCR No.	:	2020.05	Issued by	:	Trismadi N
Date Issued	:	13 March 2020	Time Limit	:	12 June 2020
NC Grade	:	Critical	Date of Closing	:	14 May 2020
Standard Ref. & Requirement	:	7.12.8 Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.			
Evidence observed (filled by auditor): <ul style="list-style-type: none"><li>The Chronology of LUCA submission by SDP update is available until January 2019 where the company has sent LUCA reports to the RSPO (19 reports) along with shapefiles in August 2018, in October 2018 the RSPO has responded with a note requiring clarification. Based on PT MAL's communication with the RSPO on February 13, 2019, the RSPO stated that currently the LUCA status for PT LMI is still awaiting finalization and clarification from SDP Berhad.</li><li>Land use / cover change analysis (LUCC) reporting checklist from the RSPO dated 9 August 2019 is known that there are still data that need to be clarified, including:<ul style="list-style-type: none"><li>I. Provide missing satellite imageries, land cover and vegetation coefficient shapefiles for all 4 estates that cover all 2005, 2007 and 2009 years.</li><li>II. Provide substitute satellite imageries for the no-data gaps and artifacts that are observed to be present for all the imageries.</li><li>III. Provide the RSPO Remediation and Compensation Liabilities Report PT BSS V1 report for reviewers to reference the calculation and validity of the satellite imageries used.</li></ul></li></ul>					
Non-Conformance Description (filled by auditor): <p>Based on the description above, the Company has not been able to show evidence of data clarification above and the approval of the Land Use Change Analysis (LUCA).</p>					
Root Cause Analysis (filled by organization audited): <p>PT LMI -Betung has not received information from Management Simerdarby after August 9, 2019</p>					
Correction (filled by organization audited): <p>GSQM coordinated with Sinedarby for the PT LMI LUCA reporting process and status, and progress status was obtained until April 16, 2020, updating the PT LMI LUCA review report. ( attached )</p>					
Corrective Action (filled by organization audited): <p>RSPO team of PT. LMI will continue to communicate with Simerdarby by GSQM for the status and update of the LUCA Report to the RSPO</p>					
Assessor Evaluation and Conclusion (filled by auditor): <p>Verification, 21 April 2020.</p>					

The Certification Unit shows the LUCA report status table for PT LMI dated April 21, 2020 which informs the date of the external audit March 9-14, 2020, reviewer by Borneo Future and ERE Consulting Group. However, evidence of clarification to the RSPO has not yet been explained in relation to the data below:

- I. Provide missing satellite imageries, land cover and vegetation coefficient shapefiles for all 4 estates that covers all 2005, 2007 and 2009 years.*
- II. Provide substitute satellite imageries for the no-data gaps and artefacts that are observed to be present for all the imageries.*
- III. Provide the **RSPO Remediation and Compensation Liabilities Report PT BSS V1** report for reviewers to reference the calculation and validity of the satellite imageries used.*

As well as evidence of the approval of the Land Use Change Analysis (LUCA) by the RSPO. Based on the explanation above, this discrepancy was declared not yet fulfilled.

**Verification, 14 May 2020**

The Certification Unit shows some evidence of improvement as follows:

1. RaCP progress update matrix, note that the value of Final Conservation Liability: 0.
2. The results of Simedarby Plantation's communication with the RSPO Secretariat on May 14, 2020, are as follows:
  - a. NC raised to the units with FCL = 0 can be closed and hence proceed with certification.
  - b. NC raised to the units with FCL value, the NC can be left open until the next ASA in which the compensation plan needs to be approved by then.

**Auditor Conclusion:**

Based on the improvements that have been shown, this nonconformity has been closed.

Verified by	:	Trismadi N
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**3.4.2 Opportunity for Improvement**

No	Ref. Std.	Description
1	2.1.1 Critical	The company is considering following up on the process of extending permits for the utilization of wastewater to the land (land application) and permit for Temporary Storage of Hazardous and Toxic Waste (TPS LB3). (Observation)
2	Non-Critical 2.2.2	The company is considering monitoring the agreement between the contractor and its employees in accordance with applicable legal obligations
3	Non-Critical 3.7.2	The certification unit to be consider keeping the training recors for each employee. (Observations).
4	5.1.7 Non Critical	Companies considered for follow-up related to the recalibration of the weighbridge. (Observation).

**3.4.3 Noteworthy Positive Components**

No	Description
1	Award from the Ministry of Environment and Forestry with the PROPER Blue title for the period 2018 - 2019.
2	Award from the Governor of East Kalimantan no 566/771 / Disnakertrans on 12 February 2020 Regarding Zero Accident at PT LMI Betung Factory since 1 January 2015 - 31 December 2019.
3	The company's commitment to implementing the principles of sustainable palm oil management.
4	The company has competent human resources in each operation.

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

Public Issues (Institution/ NGO/Community)	Auditor Verification
<b>Worker Union (Head of SYE Unit)</b> <ul style="list-style-type: none"> <li>- There are 449 member in Sekayu Estate.</li> <li>- There are no industrial relation conflict during last year</li> <li>- Renewal CLA period of 2018 to 2020 has signed by management and workers.</li> <li>- There are no complaint for rice allowance and rice quality every month</li> <li>- Human Right Protection Policy had been socialized by the company.</li> <li>- There are no discrimination issues.</li> <li>- The company has provided adequate housing.</li> <li>- Drink water sources is from well water</li> <li>- There are education facilities on the company from toddler level till senior high school.</li> <li>- All workers has register on BPJS program.</li> </ul>	<ul style="list-style-type: none"> <li>- It has been verified by auditor team.</li> <li>- It has been verified by auditor team.</li> <li>- It has been verified by auditor team.</li> <li>- It has been verified by auditor team.</li> <li>- It has been verified by auditor team.</li> <li>- It has been verified by auditor team.</li> <li>- It has been verified by auditor team.</li> <li>- It has been verified by auditor team.</li> <li>- It has been verified by auditor team.</li> <li>- It has been verified by auditor team.</li> </ul>
<b>Balaimea Village (Head, secretary, and treasurer of Bina Swadaya Karya Cooperative)</b> <ul style="list-style-type: none"> <li>- There are 54 member of cooperative</li> <li>- The prospective land owner has been signed by Kotabaru Regent Letter number 188.45/540//KUM/2019 dated 18 September 2019 with area 128 Ha (Sekayu Baru Village 155 Ha and Balaimea Village 109.7 Ha).</li> <li>- There are regularly meeting with PSD team to informing about smallholders development progress.</li> <li>- There are CSR on infrastructure, youth activity, religion from company during last year.</li> </ul>	<ul style="list-style-type: none"> <li>- It has been verified by auditor team.</li> <li>- It has been verified by auditor team.</li> <li>- It has been verified by auditor team.</li> <li>- It has been verified by auditor team.</li> </ul>
<b>Sekayu Baru Village Community Leaders; Head of Sekayu Baru Village</b> <ul style="list-style-type: none"> <li>• The presence of the company has a positive impact on the community of Desa Sekayu Baru, including related to the opening of employment opportunities for the community and an increase in community income by the presence of several people who sell the needs of the company's employees.</li> <li>• The relationship between the company and the community is good.</li> <li>• Socialization of company policies, endangered species, protected areas, and protection of river riparian and prevention of land fires has been carried out</li> <li>• So far there have been no land disputes, restrictions on access to the company, or environmental issues from the company's activities.</li> </ul>	<p>The company has established good relations with the community. There are no negative issues regarding the company's existence, related to the expectation of the development of oil palm farmers in Desa Sekayu Baru that has been verified in indicator 5.1.8</p>



Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> <li>The previous land owners were explain that during land acquisition process through with FPIC process. There is no coercion and threat from the company.</li> <li>Expect coaching for oil palm farmers in Sekayu Baru Village.</li> </ul>	
<b>Betung Village Community Leaders; Head of Betung Village</b> <ul style="list-style-type: none"> <li>The presence of the company has a positive impact on the community of Desa Sekayu Baru, including related to the opening of employment opportunities for the community and an increase in community income by the presence of several people who sell the needs of the company's employees.</li> <li>There is a desire from the people who work at the company to be appointed as permanent employees.</li> <li>So far there have been no land disputes, restrictions on access to the company, or environmental issues from the company's activities.</li> <li>The previous land owners were explain that during land acquisition process through with FPIC process. There is no coercion and threat from the company.</li> <li>There is a request from the community if replanting activities will be carried out so that the company first takes steps to anticipate the impact of the emergence of horn beetle pests resulting from replanting activities.</li> </ul>	<p>The company has made good relations with the community. There are no negative issues regarding the company's existence, related to the desire of people who work at the company to be appointed as permanent employees has been verified in indicator 3.5.2 and this is a discrepancy.</p>
<b>Tuesday, 10 March 2020.</b> <b>Gender Committe of PT Laguna Mandiri</b> Based on interview with Head of Gender Committe PT Laguna Mandiri, its known for period 2019 until 2020 there is no complaint and report related sexual harrassment. The gender committe has been socializing mechanism of sexual harrassment handling. The informant has been protected by the gender committe (anonym). Beside that there is a reproduction policy related menstruation and Pregnancy haid as much as 2 days and 1 ½ before and after giving birth. Program gender committe for 2020 such as religious and cleaning activity. Every division has represantive of gender committe. So, if there is case, they can report to the gender committe representative.	<p>There is no negative issue related to women workers. The management unit has comply with RSPO standard.</p>
<b>Local contractor for stone activity (CV Kabahuman Jaya Abadi).</b> <b>(Betung Village).</b>  Based on interview with Local contractor, cooperation activity with the company has been established since 1996. For this	<p>There is no issues related contractors.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>surveillance, preparation of agreement still in progress forming. The latest agreement was been conducted on October 2019, located in Block B37 Division 1 Betung Estate for foundation of road expansion. Member of contractor consists of 4 workers (<i>borongan</i>). PPE and health insurance have been provided by local contractor; this is accordance with the agreement. Time partnership until 3 months. PPE consist of, Helmet, Shoes (boat) and golves. Health insurance its cooperation with <i>Puskemas Bakau</i>.</p> <p>The company was conducted evaluation to contractor such as work quality, target and PPE. During know, there is no constraints and issues between contractor and the company. The company was conducted socialization related code of ethics, forbidden to employs children below the age, PPE and others.</p> <p>The payment has been carried a regular basis according with the agreement. The payment for workers was been paid in cash accorandace with target (Basis). Example: In October 2019, salary was been paid as much as IDR 14,000,000 for 4 persons. So, each worker gets paid as much as IDR IDR 3,500,000, -.</p>	
<p><b>Local contractor for Loose fruit picker “<i>Kutib berondolan</i>” (CV Risa Jaya) for Sekayu Estate.</b></p> <p>Based on interview with local contractor, the agreement has been established since January – December 2020 and signed by the both parties. The workers of CV Risa Jaya consist of 64 workers. 38 workers have been registered for health insurance and 26 workers still progress (The documents have been given to the <i>BPJS</i> Office). The contractor provides PPE such as gloves and shoes (boat). The payment to the workers was conducted every 1 month based on basis (Target of loose fruit). Wage estimate earned by workers for 1 month as much as IDR 3,034,828.</p> <p>The payment for contractor was been paid regularly by the company. Based on interview, during now there has been no socilization regarding code of conduct and human right policy. There socialization related PPE and forbidden to employs children below the age.</p>	<p>There is no issues related contractors.</p>

4.0	<b>CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY</b>
4.1	<b>Formal Sign-off of Assessment Findings</b>
	<p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end; margin-top: 100px;"> <div style="text-align: center;"> <p>PT Laguna Mandiri Management Representative</p>  <p><u>Alagendran Maniam</u> Thursday, 04 June 2020</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><u>Trismadi Nurbayuto</u> Thursday, 04 June 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.	Head of Gender Committee	Kotabaru Regency, South Borneo Province	-	Interview	March 11, 2020	√	-
2.	Local contractor of Loose Pickers (CV Risa Jaya)	Kotabaru Regency, South Borneo Province	-	Interview	March 11, 2020	√	-
3.	Betung Factory. - 2 Securities - 4 sortation workers - 1 clerk of weighbridge - 2 operator WTP - 1 mechanic - 1 oil storage operator - 1 production clerk - 1 hazardous waste storage officer	Kotabaru Regency, South Borneo Province	-	Interview	March 11, 2020	√	-
4.	Local contractor for stone activity (CV Kabahaman Jaya Abadi). (Betung Village).	Betung Village, Kotabaru Regency, South Borneo Province	-	Interview	March 10, 2020	√	-
5.	Head of Sekayu Baru Village as previous land owner	Sekayu Baru Village, Kotabaru Regency, South Borneo Province	-	Interview	March 10, 2020	√	-
6.	Head of Betung Village as previous land owner	Betung Village, Kotabaru Regency, South Borneo Province	-	Interview	March 11, 2020	√	-
7.	Sekayu Estate • 1 driver truk for pesticide spray • 1 supervision of pesticide spray • 4 women workers of pesticide spray • 4 women workers of manuring	Kota baru Regency	-	Interview	March 11, 2020	√	-
8.	Betung Estate • 1 supervision of manuring • 4 women workers of manuring	Kota baru Regency	-	Interview	March 12, 2020	√	-

<ul style="list-style-type: none"> <li>• 1 supervision of spraying</li> <li>• 6 women workers of spraying</li> <li>• 4 harvester</li> </ul>						
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**Appendix 2. Assessment Program**

DATE	09 – 14 March 2020	
PLANNED TIME	PROCESSES / CLAUSES AUDITED	AUDITOR
Monday, 09 March 2020		
06.30 – 10.00	JAKARTA → BALIKPAPAN	ALL Team
10.00 – 17.00	BALIKPAPAN → PT LMI (BETUNG POM)	
Tuesday, 10 March 2020		
08.00 – 09.00	<ul style="list-style-type: none"><li>• Opening Meeting</li><li>• Stakeholders Consultation to Labour Union, Committee Gender, EFB/CPO transporter, Local Contractor, Labor Cooperative, etc</li><li>• Stakeholders Consultation to Government Agency (via phone)</li><li>• Stakeholder Consultation to Nearest Community, Previous Land Owners, Smallholders</li></ul>	<ul style="list-style-type: none"><li>• BRP/TNB</li><li>• YYT</li><li>• NCH</li></ul>
09.00 – 12.00		
12.00 – 14.00	Break	
14.00 – 17.00	<b>Field Observation BETUNG POM</b> <ul style="list-style-type: none"><li>• Workshop, Chemical Storage, Loading Ramp (Grading), waste management</li><li>• Supply Chain &amp; Operational activities</li><li>• WWTP (IPAL), Land Application (LA), WTP, Hazardous Waste Material (LB3) management, etc</li><li>• Document Review and Clarification of Field Observation</li></ul>	<ul style="list-style-type: none"><li>• TNB</li><li>• BRP/YYT</li><li>• NCH</li></ul>
Wednesday, 11 March 2020		
08.00 – 12.00	<b>Field Observation SEKAYU ESTATE</b> <ul style="list-style-type: none"><li>• Manuring, Spraying, Harvesting, Integrated Pest Management (IPM), and Worker Welfare (payments, complaint mechanism)</li><li>• Legal operational</li><li>• High Conservation Value Area, Empty Fruit Bunch Application, Fragile Soil Management</li><li>• Worker facilities (housing, health clinic, clean water, etc) and Hazardous Waste Material (B3) management, Land Fire facilities, Storage, etc.</li></ul>	<ul style="list-style-type: none"><li>• YYT</li><li>• NCH</li><li>• NCH</li><li>• BRP</li></ul>
12.00 – 14.00	Break	
14.00 – 17.00	<ul style="list-style-type: none"><li>• Continue Field Observation and field observation clarification</li><li>• Verification of field visit and completing checklist</li></ul>	All Team
Thursday, 12 March 2020		
08.00 – 12.00	<b>Field Observation BETUNG ESTATE</b> <ul style="list-style-type: none"><li>• Manuring, Spraying, Harvesting, Integrated Pest Management (IPM), and Worker Welfare (payments, complaint mechanism)</li><li>• Legal operational</li><li>• High Conservation Value Area, Empty Fruit Bunch Application, Fragile Soil Management</li><li>• Worker facilities (housing, health clinic, clean water, etc) and Hazardous Waste Material (B3) management, Land Fire facilities, Storage, ect.</li></ul>	<ul style="list-style-type: none"><li>• YYT</li><li>• NCH</li><li>• NCH</li><li>• BRP</li></ul>



DATE	09 – 14 March 2020	
PLANNED TIME	PROCESSES / CLAUSES AUDITED	AUDITOR
12.00 – 14.00	Break	
14.00 – 17. 00	<ul style="list-style-type: none"><li>Continue Field Observation and field observation clarification</li><li>Verification of field visit and completing checklist</li></ul>	All Team
Friday, 13 March 2020		
08.00 – 11.00	<ul style="list-style-type: none"><li>Closing Meeting</li></ul>	All Team
11.00– 20.00	<ul style="list-style-type: none"><li>Traveling from Plantation Site to Balikpapan</li></ul>	
Saturday, 13 March 2020		
10.55 – 13.00	BALIKPAPAN → JAKARTA	All Team