

Roundtable on Sustainable Palm Oil Certification
R S P O

[✓] Surveillance

Name of Management : Mandah Palm Oil Mill – PT Bhumireksa Nusasejati subsidiary of Sime Darby Organisation
 Organisation : Plantation, Berhad
 Plantation Name : Mandah Estate and Rotan Semelur Estate
 Location : Bente Village, Mandah Sub District, Indragiri Hilir District, Riau Province, Indonesia
 Certificate Code : **MUTU-RSPO/036**
 Date of Initial Registration : 01 April 2014
 Date of Certificate Issue : 26 June 2019 Date of License Issue : 01 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	16-18, 20, 26 March 2020	Trismadi Nurbayuto (Lead Auditor), Brigitta Prita, Briyogi Shadiwa, Nurdin Chaeriana	Ardiansyah	Octo H.P.N Nainggolan

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-1.1	22 June 2020

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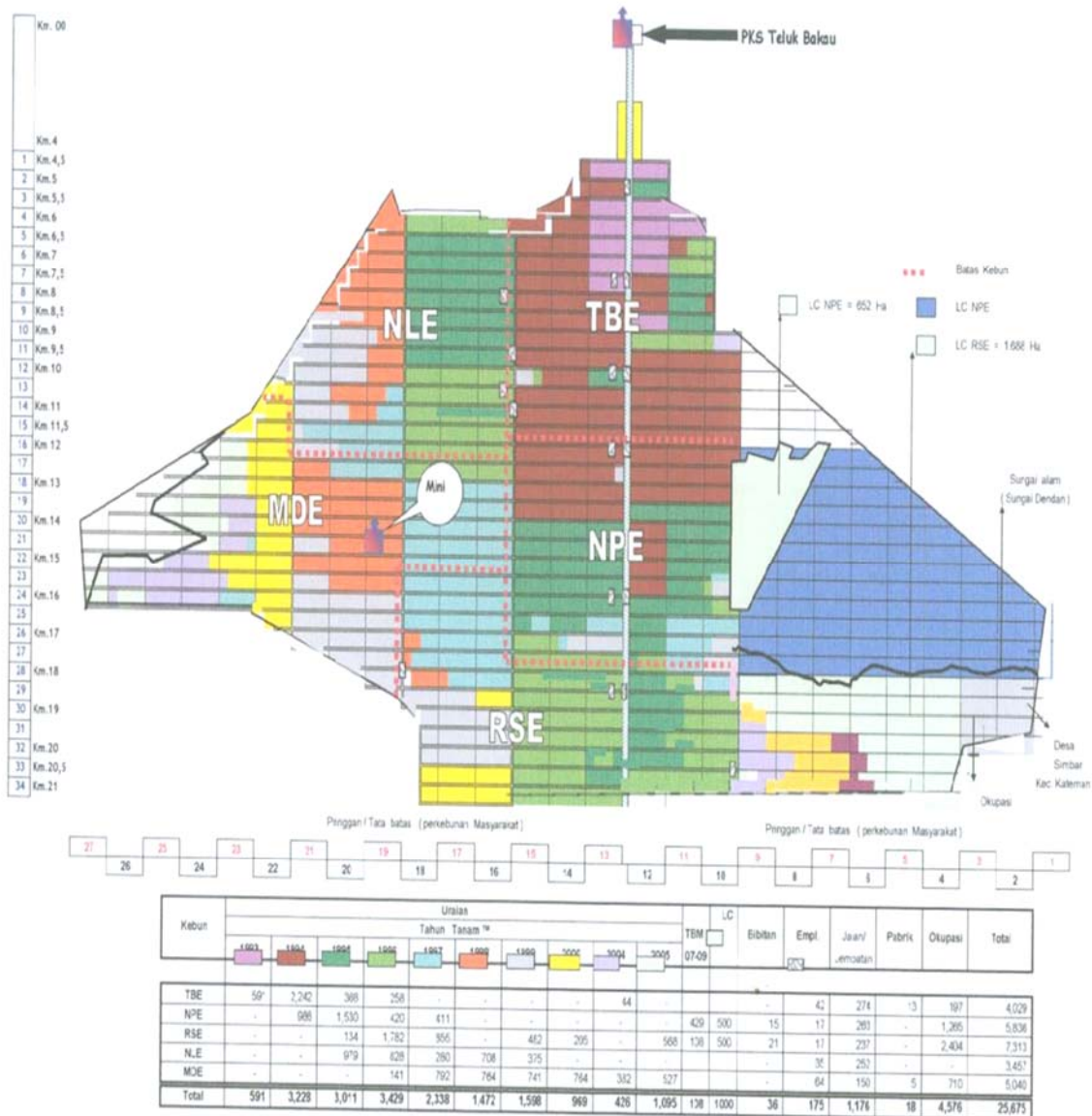
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Figure 1. Location Map of Bhumireksa Nusasejati



Figure 2. Operational Map of Bhumireksa Nusasejati



Abbreviations Used

AC	:	Area Controller
AMDAL / SEIA	:	<i>Analisis Mengenai Dampak Lingkungan</i> (Social and Environmental Impact Assessment)
AMAN	:	<i>Aliansi Masyarakat Adat Nusantara</i> (Non Government Organization)
BKS-PPS	:	<i>Badan Kerja Sama – Perusahaan Perkebunan Sumatera</i>
BKSDA	:	<i>Balai Konservasi Sumber Daya Alam</i> (Natural Resources Conservation Center)
BNS	:	Bhumireksa Nusasejati
BOD	:	Biological Oxygen Demand
BPJS TK	:	<i>Badan Penyelenggara Jaminan Sosial Tenaga Kerja</i> (Social Security Administrator for worker)
BPJS Kesehatan	:	<i>Badan Penyelenggara Jaminan Sosial Kesehatan</i> (Social Security Administrator of Health)
BPN	:	<i>Badan Pertanahan Nasional</i> (National Land Agency)
CECT	:	Closed End Conservation Trench
CH	:	Certificate Holder
CLA	:	Collective Labor Agreement
CSR	:	Corporate Social Responsibility
CPO	:	Crude Palm Oil
EFB	:	Empty Fruit Bunch
ESH	:	Environment and Occupational Safety and Health
FFB	:	Fresh Fruit Bunches
GSQM	:	Group Sustainability Quality Management
HCS	:	High Carbon Stock
HCV	:	High Conservation Value (<i>Nilai Konservasi Tinggi</i>)
HGU	:	<i>Hak Guna Usaha</i> . (Land Use Title)
HIRARC	:	Hazard Identification Risk Assessment and Risk Control
HO	:	Head Office
IPM	:	Integrated Pest Management
ISPO	:	Indonesian Sustainable Palm Oil
IUP	:	<i>Izin Usaha Perkebunan</i> . (Plantation Business License)
JAMSOSTEK	:	<i>Jaminan Sosial Tenaga Kerja</i> (Social Assurance of Labor)
JAMKESMAS	:	<i>Jaminan Kesehatan Masyarakat</i> (community health security from government)
KK	:	<i>Kartu Keluarga</i> (letters which describe the Family members)
KTP	:	<i>Kartu Tanda Penduduk</i> (Personal Identity Card)
LK3P	:	<i>Lembaran Kertas Kerja Kesimpulan Pemeriksaan</i> (Conclusion Examination Working Paper)
LUCA	:	Land Use Change Analysis
MDE	:	Mandah Estate
MRC	:	Minamas Research Centre
MSDS	:	Material Safety Data Sheet
MTs	:	<i>Madrasah Tsanawiyah</i> (Islamic Junior High School)
NC	:	Non-Conformity
NLE	:	Nusa Lestari Estate
OER	:	Oil Extraction Rate
OHS	:	Occupational Health and Safety
P2K3	:	<i>Panitia Pembina Keselamatan and Kesehatan Kerja</i> (Occupational Safety and Health Committee)
PK	:	Palm Kernel
PKO	:	Palm Kernel Oil
PKWT	:	<i>Perjanjian Kerja Waktu Tertentu</i> / temporary time agreement workers/specific workers
POM	:	Palm Oil Mill
PPE	:	Personal Protection Equipment
PSD	:	Plantation Services Department

PSQM-EHS	:	Plantation Sustainability and Quality Management-Environment Health and Safety
PTSP	:	<i>Pelayanan Terpadu Satu Pintu</i> (One Stop Integrated Services)
RaCP	:	Remediation and Compensation Procedure
RKL/RPL	:	<i>Rencana Kelola Lingkungan/ Rencana Pemantauan Lingkungan</i> (Environmental Management and Monitoring Plan)
RSE	:	Rotan Semelur Estate
RSPO	:	Roundtable on Sustainable Palm Oil
SIA	:	Social Impact Assessment
SCCS	:	Supply Chain Certification System
SKP	:	<i>Surat Keterangan Penunjukkan</i> (Certificate of Appointment)
SKP AK3	:	<i>Surat Keterangan Penunjukkan Ahli Kesehatan dan Keselamatan Kerja</i> (Certificate of Appointment of Occupational Health and Safety Expert)
SOP	:	Standard Operating Procedure
SOU	:	Strategic Operation Unit
SPSI	:	Serikat Pekerja Seluruh Indonesia (Labor Union)
RTRW	:	<i>Rencana Tata Ruang Wilayah</i> (Spatial plans)
UKL/UPL	:	<i>Upaya Kelola Lingkungan/ Upaya Pemantauan Lingkungan</i> (Environmental Management and Monitoring Efforts)
WWF	:	World Wildlife Fund
WWTP	:	Wastewater Treatment Plant
WTP	:	Water Treatment Plant

1.0	SCOPE of the CERTIFICATION ASSESSMENT								
1.1	Assessment Standard Used	<ul style="list-style-type: none">Principles and Criteria for the Production of Sustainable Palm Oil 2018, endorsed by the RSPO Board of Governors and adopted at the 15th Annual General Assembly by RSPO Member on 15 November 2018RSPO Certification System for Principles and Criteria, 14 June 2017.							
1.2	Organisation Information								
1.2.1	Organisation name listed in the certificate	PT Bhumireksa Nusasejati, subsidiary of Sime Darby Plantations Bhd.							
1.2.2	Contact person	Alagendran Maniam							
1.2.3	Organisation address and site address	RSPO registered company: No 2, Plantation Tower, PJU 1A/7Street Petaling Jaya, Malaysia 47301 Liaison Office: The Plaza Office Tower, 36 th Floor Jl. MH Thamrin Kav. 28-30, Jakarta 10350							
1.2.4	Telephone	+62-21-29926000							
1.2.5	Fax	+62-21-29922686							
1.2.6	E-mail	alagendran.maniam@sime-darbyplantation.com							
1.2.7	Web page address	www.sime-darbyplantation.com							
1.2.8	Management Representative who completed the application for certification	Alagendran Maniam (Head Sustainability & Quality Management - Minamas Plantation)							
1.2.9	Registered as RSPO member	07 September 2004 (1-0008-04-000-00)							
1.3	Type of Assessment								
1.3.1	Scope of Assessment and Number of Management Unit	Palm Oil Mill and supply base <ul style="list-style-type: none">Mandah Palm Oil Mill, Mandah Estate and Rotan Semelur Estate							
1.3.2	Type of certificate	Single							
1.4	Locations of Mill and Plantation								
1.4.1	Location of Mill								
	Name of Mill	Location	<table><tr><th colspan="2">Coordinate</th></tr><tr><th>Latitude</th><th>Longitude</th></tr><tr><td>N 00° 06' 57"</td><td>E 103° 32' 57"</td></tr></table>	Coordinate		Latitude	Longitude	N 00° 06' 57"	E 103° 32' 57"
Coordinate									
Latitude	Longitude								
N 00° 06' 57"	E 103° 32' 57"								
	Mandah POM	Bente Village, Mandah Sub-district, Indragiri Hilir District, Riau Province, Indonesia							
1.4.2	Location of Certification Scope of Supply Base								
	Name of Supply Base	Location	<table><tr><th colspan="2">Coordinate</th></tr><tr><th>Latitude</th><th>Longitude</th></tr><tr><td>N 00° 08' 07"</td><td>E 103° 32' 51"</td></tr></table>	Coordinate		Latitude	Longitude	N 00° 08' 07"	E 103° 32' 51"
Coordinate									
Latitude	Longitude								
N 00° 08' 07"	E 103° 32' 51"								
	Mandah Estate	Rotan Semelur Village, Pelangiran Sub District, Indragiri Hilir District, Riau Province, Indonesia							

	Rotan Semelur Estate	Rotan Semelur Village, Pelangiran Sub District, Indragiri Hilir District, Riau Province, Indonesia	N 00° 07' 04"	E 103° 36' 17"
1.5	Description of Area Statement			
1.5.1	Tenure			
	<ul style="list-style-type: none">State		a. HGU (land title) certificate Number 01 dated 23 May 1996 for 13,900 Ha* b. HGU (land title) certificate Number 02 dated 23 May 1996 for 11,762 Ha* *HGU for all estate under PT BNS	
	<ul style="list-style-type: none">Community		Ha	
1.5.2	Area Statement			
			Total	
	<ul style="list-style-type: none">Total area		12,366.18	Ha
	<ul style="list-style-type: none">Mature area		7,813.00	Ha
	<ul style="list-style-type: none">Immature area		426.00	Ha
	<ul style="list-style-type: none">Mill		14.00	Ha
	<ul style="list-style-type: none">Emplacement		115.18	Ha
	<ul style="list-style-type: none">Infrastructure (Canal & trenches)		384.00	Ha
	<ul style="list-style-type: none">Occupation		2,908.08	Ha
	<ul style="list-style-type: none">HCV		705.92	Ha
1.6	Planting Year and Cycles			
1.6.1	Age profile of planting year			
	Planting Year	Hectarage (Ha)		
		Mandah Estate	Rotan Semelur Estate	Total
	1996	-	658	658
	1997	291	846	1,137
	1998	810	-	810
	1999	645	482	1,127
	2000	642	205	847
	2004	521	-	521
	2005	510	568	1078
	2007	-	108	108
	2014	-	390	390
	2015	276	139	415
	2016	-	448	448
	2017	274	-	274
	Sub Total Mature	3,969	3,844	7,813
	2018	142	284	426

	Sub Total Immature	142	284	426																											
	Total	4,111	4,128	8,239																											
1.6.2	New Planting area after January 2010		- Ha																												
1.6.3	Planting Cycle		1 st Cycle																												
1.7	Description of Mill and Supply Base																														
1.7.1	Description of Mill																														
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	<table><tr><th colspan="2">CPO</th><th colspan="2">Palm Kernel</th></tr><tr><th>Out put (tonnes)</th><th>Extraction (%)</th><th>Out put (tonnes)</th><th>Extraction (%)</th></tr><tr><td>Mandah</td><td>45</td><td>85,753.59</td><td>19,211.10</td><td>22.40</td><td>4,654.33</td><td>5.00</td></tr></table>	CPO		Palm Kernel		Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)	Mandah	45	85,753.59	19,211.10	22.40	4,654.33	5.00												
CPO		Palm Kernel																													
Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)																												
Mandah	45	85,753.59	19,211.10	22.40	4,654.33	5.00																									
	<i>*Production data source from March 2019 to February 2020</i>																														
1.7.2	Description of Certification Scope of Supply Base																														
	Name of Estate	Total Area (Ha)	Planted Area (Ha)	<table><tr><th rowspan="2">FFB (tonnes/year)</th><th rowspan="2">Yield (tonnes/ ha/year)</th><th colspan="2">Supplied to Mill</th></tr><tr><th>FFB (tonnes/y ear)</th><th>%</th></tr><tr><td>Mandah</td><td>5,053.18</td><td>4,111.00</td><td>46,779.90</td><td>11.79</td><td>46,779.90</td><td>100</td></tr><tr><td>Rotan Semelur</td><td>7,313.00</td><td>4,128.00</td><td>37,236.90</td><td>9.69</td><td>37,236.90</td><td>100</td></tr><tr><td>Total</td><td>12,366.18</td><td>8,239.00</td><td>84,016.80</td><td>10.74</td><td>84,016.80</td><td>100</td></tr></table>	FFB (tonnes/year)	Yield (tonnes/ ha/year)	Supplied to Mill		FFB (tonnes/y ear)	%	Mandah	5,053.18	4,111.00	46,779.90	11.79	46,779.90	100	Rotan Semelur	7,313.00	4,128.00	37,236.90	9.69	37,236.90	100	Total	12,366.18	8,239.00	84,016.80	10.74	84,016.80	100
FFB (tonnes/year)	Yield (tonnes/ ha/year)	Supplied to Mill																													
		FFB (tonnes/y ear)	%																												
Mandah	5,053.18	4,111.00	46,779.90	11.79	46,779.90	100																									
Rotan Semelur	7,313.00	4,128.00	37,236.90	9.69	37,236.90	100																									
Total	12,366.18	8,239.00	84,016.80	10.74	84,016.80	100																									
	<i>*Production data source from March 2019 to February 2020</i>																														
1.7.3	FFB description from other source																														
	Name of sources/Organisation (RSPO certified / non- certified)	Type of Organisation	number of smallholders	<table><tr><th rowspan="2">Production Area (Ha)</th><th colspan="2">Supplied to Mill</th></tr><tr><th colspan="2">FFB (tonnes/year)</th></tr><tr><td>Teluk Bakau Estate, PT Bhumireksa Nusasejati (RSPO Certified)</td><td>Subsidiary of Sime Darby Plantation Berhad</td><td>-</td><td>3,442.85</td><td>125.41</td></tr><tr><td>Nusa Lestari Estate, PT Bhumireksa Nusasejati (RSPO Certified)</td><td>Subsidiary of Sime Darby Plantation Berhad</td><td>-</td><td>3,169.74</td><td>243.95</td></tr><tr><td>Nusa Perkasa Estate, PT Bhumireksa Nusasejati (RSPO Certified)</td><td>Subsidiary of Sime Darby Plantation Berhad</td><td>-</td><td>3,778.11</td><td>1,367.43</td></tr><tr><td colspan="4">Total</td><td>1,736.79</td></tr></table>	Production Area (Ha)	Supplied to Mill		FFB (tonnes/year)		Teluk Bakau Estate, PT Bhumireksa Nusasejati (RSPO Certified)	Subsidiary of Sime Darby Plantation Berhad	-	3,442.85	125.41	Nusa Lestari Estate, PT Bhumireksa Nusasejati (RSPO Certified)	Subsidiary of Sime Darby Plantation Berhad	-	3,169.74	243.95	Nusa Perkasa Estate, PT Bhumireksa Nusasejati (RSPO Certified)	Subsidiary of Sime Darby Plantation Berhad	-	3,778.11	1,367.43	Total				1,736.79		
Production Area (Ha)	Supplied to Mill																														
	FFB (tonnes/year)																														
Teluk Bakau Estate, PT Bhumireksa Nusasejati (RSPO Certified)	Subsidiary of Sime Darby Plantation Berhad	-	3,442.85	125.41																											
Nusa Lestari Estate, PT Bhumireksa Nusasejati (RSPO Certified)	Subsidiary of Sime Darby Plantation Berhad	-	3,169.74	243.95																											
Nusa Perkasa Estate, PT Bhumireksa Nusasejati (RSPO Certified)	Subsidiary of Sime Darby Plantation Berhad	-	3,778.11	1,367.43																											
Total				1,736.79																											
	<i>*Source Production Data from March 2019 to February 2020</i>																														
1.7.4	Product categories		FFB, CPO, PK																												
1.8	Tonnage of Product																														
1.8.1	Past Annual Claim Certified Product		Last Year Projected Certified Volume (MT)	Last Year Actual Certified Volume (MT)																											
	FFB Processed		108,686	85,753.58																											
	CPO Production		24,418	19,211.10																											
	Palm Kernel (PK) Production		5,495	4,654.33																											

1.8.2	Product selling							
	Type of selling product			Actual selling product for last year (MT)				
	CSPO sold as RSPO certified product			1,897.58				
	CSPK sold as RSPO certified product			2,880.44				
	CSPO sold under other scheme			0				
	CSPK sold under other scheme			0				
	CSPO sold as conventional			16,006.21				
	CSPK sold as conventional			1,727.43				
1.8.3	Estimate of Certified FFB Claim							
	Name of Estate(s)		Total Area (Ha)	Planted Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)		
	Mandah		5,053.18	4,111.00	53,250	12.95		
	Rotan Semelur		7,313.00	4,128.00	45,100	10.93		
	TOTAL		12,366.18	8,239.00	98,350	11.94		
	<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		Palm Kernel		Supply Chain Module
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)	
	Mandah	45	98,350	22,800	23.00	5,400	5.5	IP
	<i>*Projected CSPO and CSPK production for 01 April 2020 to 31 March 2021.</i>							
1.9	Other Certifications							
	ISPO			MUTU-ISPO/078 dated 5 April 2017 to 4 April 2022				
1.10	Time Bound Plan							
1.10.1	Time Bound Plan for Other Management Units							
	Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status		
	Mill	Time bound						
	INDONESIA							
1	Sekunzir. PT. Indotruba Tengah	2010	Sekunzir	2010	Seruyan and West Kotawaringin District – Central Kalimantan	Certified		
			Seruyan	2010		Certified		
2	Manggala. PT. Tunggal Mitra Plantations	2010	Manggala 1	2010	Rokan Hilir District – Riau	Certified		
			Manggala 2	2010		Certified		
			Manggala 3	2010		Certified		
3	Bukit Ajong PT. Sime Indo Agro	2010	West	2010	Sanggau District –West Kalimantan	Certified		
			West (HGU on process)	2019		-		
			East	2010		Certified		
			East (HGU on process)	2019		-		

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

	PT. Langgeng Muaramakmur		Bakau	2011	Kalimantan	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 TKG	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	2011	Tennamaram	2011	Bestari Jaya, Selangor	Certified

	SOU 6		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 Sebalang	2011		Certified
			Sg Senarut	2011		Certified

18	Kempas SOU 17	2010	Kempas	2010	Jasin, Melaka	Certified
			Kemuning	2010		Certified
			Tangkah	2010		Certified
19	Diamond Jubilee SOU 18	2011	Bukit Asahan	2011	Jasin, Melaka	Certified
			Diamond Jubilee	2011		Certified
			Serkam	2011		Certified
20	Pagoh SOU 19	2014	Pagoh	2014	Muar, Johor	Certified
			Lanadron	2014		Certified
			Pengkalan Bukit	2014		Certified
			Welch	2014		Certified
21	Chaah SOU 20	2010	North Labis	2010	Chaah, Johor	Certified
			Cha'ah	2010		Certified
			Sg Simpang Kiri	2010		Certified
22	Gunung Mas SOU 21	2010	Gunung Mas	2010	Kluang, Johor	Certified
			Kempas Klebang	2010		Certified
			Bukit Paloh	2010		Certified
			Yong Peng	2010		Certified
23	Bukit Benut SOU 22	2011	Bukit Benut	2011	Kluang, Johor	Certified
			CEP Niyor	2011		Certified
			Lambak / Elaeis	2011		Certified
24	Ulu Remis SOU 23	2011	Pekan	2011	Layang-layang, Johor	Certified
			Sembrong	2011		Certified
			Tun Dr. Ismail	2011		Certified
			Ulu Remis	2011		Certified
			Bukit Badak	2011		Certified
			Cenas	2011		Certified
25	Hadapan SOU 24	2011	CEP Rengam	2011	Layang-layang, Johor	Certified
			Kulai	2011		Certified
			Layang	2011		Certified
			Seri Pulai	2011		Certified
26	Sandakan Bay SOU 26	2008	Tun Tan Siew Sin	2008	Sandakan, Sabah	Certified
			Tunku	2008		Certified
			Tigowis	2008		Certified
			Sentosa	2008		Certified
			Saguliud	2008		Certified
27	Melalap SOU 27	2011	Melalap	2011	Tenom, Sabah	Certified
			Sapong	2011		Certified
28	Binuang	2009	Tingkeyu	2009	Kunak, Sabah	Certified

	SOU 28		Sungang	2009		Certified
			Jelata Bumi	2009		Certified
			Binuang	2009		Certified
29	Giram SOU 29	2009	Mostyn	2009	Kunak, Sabah	Certified
			Giram	2009		Certified
30	Merotai SOU 30	2009	Imam	2009	Tawau, Sabah	Certified
			Merotai	2009		Certified
			Table	2009		Certified
			Tiger	2009		Certified
31	Lavang SOU 31	2011	Belian	2011	Bintulu, Serawak	Certified
			Kelida	2011		Certified
			Lavang	2011		Certified
			Lavang (SE)	2011		Certified
			Rasan	2011		Certified
			Chartquest	2011		Certified
			Dulang	2011		Certified
			Peroh	2011		Certified
			Pekaka	2011		Certified
			Ruai	2011		Certified
32	Rajawali SOU 32	2011	Rajawali	2011	Bintulu, Serawak	Certified
			Samudera	2011		Certified
			Semarak	2011		Certified
			Bayu	2011		Certified
33	Derawan SOU 33	2011	Takau	2011	Bintulu, Serawak	Certified
			Damai	2011		Certified
			Derawan	2011		Certified
			Sahua	2011		Certified
LIBERIA						
1	Grand Cape Mount	2018	Matambo	2018	Grand Cape Mount, Liberia	IC
			Grand Cape Mount	2018		IC
			Zodua	2018		IC
			Bomi	2018	Bomi, Liberia	IC
			Lofa	2018		IC
P & G (New Britain Palm Oil)						
1	Poliamba	2012	Kara	2012	Kevieng, New Ireland Province, 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, Solomon Island	Certified
			Ngalimbiu	2011		Certified
			Mbalisuna	2011		Certified
			West Zone (Smallholders)	2011		Certified
			Central Zone (Smallholders)	2011		Certified
			MBA East (Smallholders)	2011		Certified
			MBA West (Smallholders)	2011		Certified
3	Sangara, Sambiripa & Mamba	2013	Sangara	2013	Higaturu, Popondetta, Oro, P&G	Certified
			Sumberipa	2013		Certified
			Ambogo	2013		Certified
			Embi	2013		Certified
			Mamba	2013		Certified
			Sorovi (smallholders)	2013		Certified
			Igora (smallholders)	2013		Certified
			Saiho (smallholders)	2013		Certified
			Aeka (smallholders)	2013		Certified
			Ilimo (smallholders)	2013		Certified
4	Gusap	2010	Dumpu	2010	Madang, P&G	Certified
			Surinam	2010		Certified
			Jephcott	2010		Certified
			Gusap	2010		Certified
			Paddox	2010		Certified
			Ngaru	2010		Certified
			Madang VOP (smallholders)	2010		Certified
			Morobe VOP (smallholders)	2010		Certified
5	Hagita	2013	Giligili	2013	Milne Bay, P&G	Certified
			Hagita	2013		Certified
			Waigani	2013		Certified
			Sagarai	2013		Certified
			Padipadi	2013		Certified
			Mariawatte	2013		Certified
			East Gurney	2013		Certified
			West Gurney	2013		Certified

			East Sagarai	2013		Certified				
			West Sagarai	2013		Certified				
6	Mosa Kumbango Kapiura Namumdo Waraston	2008	Bebere	2008	West New Britain	Certified				
			Kumbango	2008		Certified				
			Togulo	2008		Certified				
			Dami	2008		Certified				
			Waisisi	2008		Certified				
			Kautu	2008		Certified				
			Karaus	2008		Certified				
			Moroa	2008		Certified				
			Bilomi	2008		Certified				
			Loata	2008		Certified				
			Haella	2008		Certified				
			Garu	2008		Certified				
			Daliavu	2008		Certified				
			Sapuri	2008		Certified				
			Malilimi	2008		Certified				
			Rigula	2008		Certified				
			Nomundo	2008		Certified				
							Navarai / Karato ME	2008		Certified
							Volupai . Lotomgam / Natupi / Goruru	2008		Certified
							Lolokoru	2008		Certified
			Silovoti	2008		Certified				
			LSS Hoskin (1,877 Smallholders)	2008		Certified				
			VOP East (1,815 Smallholders)	2008		Certified				
			VOP Central (1,958 Smallholders)	2008		Certified				
			VOP West (1,277 Smallholders)Kaulong / Akamie / Pusiki / Repamira / Sakapei / KDC ME (21 large smallholders)	2008		Certified				
			LSS Kapiura (847 Smallholders)	2008		Certified				
			VOP Kapiura (551 Smallholders)	2008		Certified				
Sime Darby has achieved 34 management units in Malaysia, 25 mmanagement units in Indonesia, 10 management units in P&G that RSPO certified. Total management unit in Sime Darby Plantation Bhd are 34 in Malaysia, 25 in Indonesia and 10 in P&G. In the year of 2016 & 2017 there are three Mill that are no longer operating, and for the supplying base (Estate) is diverted to a mill that is still operating and has been certified RSPO. The mills are: 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.										

	<p>2. Selabak Mill, PT Swadaya Andhika: Mill stop operate since 2017 and the supply bases is transfer to Rantau POM, PT Laguna Mandiri</p> <p>3. Pekaka, SOU 34: Mill stop operate since 2017 and the supply bases is transfer to Lavang, SOU 31</p> <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	Progress of Associated Smallholders and Outgrowers for Certifiable Standard
	<p>The Certificate Holder did not have associated with Independent Smallholder & Out Growers.</p>

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-1.1	<p>1. Trismadi Nurbayuto (Lead Auditor). Indonesian Citizen. Diploma of Forest Management from Forestry Faculty; Associate Degree of Economic from Economic and Management. He has experienced as field assistant on oil palm plantation year of 2008. Therefore, he has experienced as HCV and SEIA Assessor on 2010-2013. He has been followed HCV identification and management training; ISO training (9001;14001; 22000); ISPO Lead Auditor's training; Safety Expert; RSPO Lead Auditor's; OHS Auditors by Government Regulation No 50 year of 2012; and RSPO Next. He has been conducted audit on ISPO and RSPO scheme since year of 2013 as an Auditor on several aspect as environment, OHS, Legality, Best Management Practices, Social, Worker Welfare, Conflict Resolutions, Long term Business Plan and Supply Chain on Palm Oil Mill. During this assessment verified Time Bound Plan, Partial Certification, Social, Worker Welfare and OHS Aspect.</p> <p>2. Brigitta Prita (Auditor). Citizen of Indonesia. Bachelor of Forestry, Department of Forest Resources Conservation and Ecotourism. She had attended Training ISPO by Commission ISPO on June 2013, Training ISO 9001:2008 Quality Management System on January 2014, In House Training 17021 and 17065 management system and Product Quality, Training High Conservation Value by IPB on September 2015, In House Training HCV on August 2016, In House Training Roundtable Sustainable Palm Oil on January 2014; In House Training ISO 14000:2004 Environmental Management System, 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 & worker welfare from RSPO on January 2019. She has been audited experience ISPO & RSPO since April 2013 in the environmental, conservation, waste management and worker welfare aspects. In this audit activity performs the assessment of Legalities, Environment, HCV and Supply Chain.</p> <p>3. Briyogi Shadiwa (Auditor). Indonesian citizens. Diploma 3 of Oil Palm Plantation. He has 7 years working experience since 2009 as Agronomy Assistant and Agronomy Quality Control in several private oil palm plantation companies in Indonesia. The training has been followed include: Training ISPO Auditor, Awareness RSPO, Lead auditor ISO 9001: 2015, Awareness SMK3, Lead Auditor ISO 14001: 2015, Awareness OHSAS 18001: 2007 and OHS Expert. During this audit, he assigned to Transparency, Best Management Practice and Long-Term Plan.</p> <p>4. Nurdin Chaeriana (Observer). Diploma 3 in 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 & Control, ISO 14001:2004 Internal Auditor. During this audit, he conducted as Observer.</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA-1.1	<p>Number of auditors: 3 auditors.</p> <p>Number of days for ASA-1.1 at site: 5 days.</p> <p>Number of working days for ASA-1.1 at site: 15 working days.</p>
2.2.2	Assessment Process
ASA-1.1	<p>The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the PT Bhumireksa Nusasejati to the requirements of Principles and Criteria for the Production of Sustainable Palm Oil 2018, endorsed by the RSPO Board of Governors and adopted at the 15th Annual General Assembly by RSPO Member on 15 November 2018 and RSPO Certification System for Principles and Criteria, 14 June 2017.</p> <p>The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) <i>interview</i>, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site.</p> <p>Some opportunities for improvement of the results ASA-1.1 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.</p> <p>Improvement of findings from main assessment findings were observed by auditors at this ASA-1.1. All information</p>

obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of **ASA-1.1**.

The onsite audit is planned to be carried out on 16 to 21 March 2020 (include travelling), but due to an auditor who is sick, the onsite audit will be accelerated so that the onsite audit carried out on 16 to 19 March 2020 (include travelling). And on 20 March 2020, a further remote audit was conducted only to confirm data that had not been verified at the onsite audit. And the closing meeting was held on 26 March 2020 by remote.

The assessment program please find Appendix 2.

2.2.3

Locations of Assessment

ASA-1.1

Mandah POM

- **Loading Ramp.** Observations and interviews with officers sorting FFB. Based on the interview, the officer can explain the criteria FFB decent though, demonstrating how sorting FFB, employment aspect, OHS aspect and working procedures specified.
- **Sterilizer Station.** Observation and interviews with operator Sterilizer regarding employment aspect, OHS aspect and working procedures specified.
- **Press Station.** Observation and interviews with operator Press regarding employment aspect, OHS aspect and working procedures specified.
- **Boiler room.** Observation and interviews with Boiler operator regarding employment aspect, OHS aspect and working procedures specified.
- **Engine Room.** Observation and interviews with engine room operator regarding employment aspect, OHS aspect and working procedures specified.
- **Chemical Warehouse.** Observation and interviews related to chemical containers management, OHS implementation, medical check up and complaint mechanism.
- **Workshop.** Observation and interviews with employees related to management of hazardous waste and hazardous material, training, provision of PPE, training, emergency response facilities.
- **Hazardous Waste Temporary Store.** Field observations and interview related hazardous waste management, OHS and environmental aspect.
- **Water Treatment Plant (WTP).** Observations and interviews related to water management, recording of water used, OHS, and waste management.
- **Fuel Oil and Lubricant Store.** Observation towards health, safety and environment aspect.
- **Waste Water Treatment Plant (WWTP) or Effluent Plant.** Field observations and interview related POME management, recording, OHS and environmental.
- **Emplacement Facilities.** Observation to emplacement facilities such as assembling points, fire extinguisher, Composting house of organic waste, in-organic waste store, sanitation system and housing quality.
- **Landfill.** Observations and interviews related to waste management.

Mandah Estate

- **Circle & Path Spraying, Field G019.** Observation and interview related to work technic (based on company Procedure), PPE and labor aspect.
- **Harvesting, Field F020.** Observation and interview related to work technic (based on company Procedure), PPE and labor aspect.
- **Leaf Analysis, Field I024.** Observation and interview related to work technic (based on company Procedure), PPE and labor.
- **Peat Subsidence Pole, Field F019.** Observation related to peat subsidence and water management.
- **Piezometer, Field H024.** Observation related to water level management.
- **HGU pole number BNS 84 & 77, Block H38.** Observation related HGU pole maintenance.
- **Emplacement Facilities.** Observation to emplacement facilities such as assembling points, fire extinguisher, Composting house of organic waste, in-organic waste store, sanitation system, housing quality, playground, mosque, and sport facilities.
- **Landfill.** Observations and interviews related to waste management.

- **Fertilizer Warehouse.** Observation related to management of fertilizer material and waste, MSDS, emergency response facilities and the types of pesticides used.
- **Pesticide Warehouse.** Observation related to management of oil and agrochemical material and waste, MSDS, emergency response facilities and the types of pesticides used.
- **Fuel Oil and Lubricant Store.** Observation towards health, safety and environment aspect.
- **PPE & Rinse House.** Observation of the management of pesticide chemicals mixing activities, as well as the management of Pesticide Applicator PPE.
- **Hazardous Waste Temporary Store.** Field observations and interview related hazardous waste management, OHS and environmental aspect.
- **Generator (Electricity).** Observation and interview with officer related to safety aspect.
- **Workshop.** Observation and interviews with employees related to management of hazardous waste and hazardous material, training, provision of PPE, training, emergency response facilities.
- **Fire Fighting Facilities.** Observation and simulation the emergencies response facilities.

Rotan Semelur Estate

- **Pest Spraying, Field D031.** Observation and interview related to work technic (based on company Procedure), PPE and labor.
- **Racking, Field F033.** Observation and interview related to work technic (based on company Procedure), PPE and labor.
- **Peat Subsidence Pole, Field D030.** Observation related to peat subsidence and water management.
- **Piezometer, Field F035.** Observation related to water level management.
- **Immature Plant, Field E033.** Observation related to agronomy aspect.
- **Barn Owl Box, Field D030.** Observation related to pest management with biological method.
- **HGU pole number BNS 50, Block H38.** Observation related HGU pole maintenance.
- **Emplacement Facilities.** Observation to emplacement facilities such as assembling points, fire extinguisher, Composting house of organic waste, in-organic waste store, sanitation system, housing quality, playground, mosque, and sport facilities.
- **Landfill.** Observations and interviews related to waste management.
- **Fertilizer Warehouse.** Observation related to management of fertilizer material and waste, MSDS, emergency response facilities and the types of pesticides used.
- **Pesticide Warehouse.** Observation related to management of oil and agrochemical material and waste, MSDS, emergency response facilities and the types of pesticides used.
- **Fuel Oil and Lubricant Store.** Observation towards health, safety and environment aspect.
- **PPE & Rinse House.** Observation of the management of pesticide chemicals mixing activities, as well as the management of Pesticide Applicator PPE.
- **Hazardous Waste Temporary Store.** Field observations and interview related hazardous waste management, OHS and environmental aspect.
- **Generator (Electricity).** Observation and interview with officer related to safety aspect.
- **Workshop.** Observation and interviews with employees related to management of hazardous waste and hazardous material, training, provision of PPE, training, emergency response facilities.
- **Fire Fighting Facilities.** Observation and simulation the emergencies response facilities.

Teluk Bakau Estate

- **Nursery.** Observation and interview with nursery workers related to nursery stock and work instruction.

2.3

Stakeholder Consultation and Stakeholders Contacted

2.3.1

Summary of stakeholder consultation process.

ASA-1.1	<p>Summary of stakeholder consultation process</p> <p>Consultation of stakeholders for PT Bhumireksa Nusasejati was held by</p> <ul style="list-style-type: none"> • Public Notification on the MUTU website www.mutucertification.com date on February 28, 2020. • Public consultation meeting with government institution (Plantation Agency, Land National Agency and Labor Agency) of Indragiri Hilir District date on March 17, 2020. • Public consultation by questionnaire to the WWF, Sawit Watch, AMAN, Aid Environment dated March 3rd, 2020. • Public consultation meeting with community including previous land owner date on March 17, 2020. • Public consultation meeting with internal stakeholders (Labor Union Secretary of Mandah Estate; Gender Committee) and also external stakeholders such as contractor of building and communities from Parit Berayun II Hamlet, Teluk Bente Village on March 17, 2020. <p>Numbers of input from stakeholders were clarified by Bhumireksa Nusasejati.</p>
2.3.2	Stakeholder contacted
	Please find appendix 1
2.4	Determining Next Assessment
	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 Mandah POM – PT Bhumireksa Nusasejati, Sime Darby Plantation Berhad operation consisting of one (1) mill and two (2) oil palm estates.

During the assessment, there were three (3) were assigned against Critical Compliance Indicators, one (1) nonconformity were assigned against Non-critical Compliance Indicators and three (3) opportunities for improvement were identified.

Further explanation of the non-conformities raised and corrective actions taken by Certificate Holder are provided in section 3.5. Certificate Holder has already prepared and implemented the corrective actions that had been reviewed and accepted by Auditors in form of documentation evidences e.g. (document record/photographic/etc). Those corrective actions taken that consist of six three (3) were assigned against Critical Compliance Indicators.

MUTUAGUNG LESTARI found that Mandah POM – PT Bhumireksa Nusasejati, Sime Darby Plantation Berhad complied with the requirements of **Principles and Criteria for the Production of Sustainable Palm Oil 2018, endorsed by the RSPO Board of Governors and adopted at the 15th Annual General Assembly by RSPO Member on 15 November 2018 and RSPO Certification System for Principles and Criteria, 14 June 2017.**

Therefore, MUTUAGUNG LESTARI Recommends RSPO Certification of compliance is *Continued*.

Ref Std.	VERIFICATION RESULT of MUTU-Certification	
PRINCIPLE #1 BEHAVE ETHICALLY AND TRANSPARENTLY		
1.1	The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.	
1.1.1, 1.1.2, 1.1.4 & 1.1.5	<p>The CH has SOP of Requesting Information Document (001/BNS/SOU20-PI/IX/16 dated 2 September 2016), as practical guidance to handle the internal and external communication related to information of RSPO, environmental, social and law. Based on these procedures, it is intended to ensure that:</p> <ul style="list-style-type: none"> All incoming requests for information will go to the operational unit and will be studied and answered by the Operations Unit Manager All responses to requests for information to be sent to parties must be signed by the Operations Unit Manager If the request for information requires the approval of the Head Department or another department, approval will be sought from the Head Department If it has been approved by the Head Department, it will be returned to the Operational unit Operational management unit will send a response letter to the parties according to the contents of the request that is adequate with a response period of 14 working days. <p>The documents that can be accessed by the public including company policy, regional director memo's, working progress of OHS & RSPO program, OHS & RSPO related matters, crop report, insurance, agreement, details of complaints and complaints, incoming and out coming letter, continuous improvement plan, land use rights, public summary and certification assessment report, and human rights policy.</p> <p>The company shows a contact list and detailed stakeholder information in the Stakeholder List Document Period 2019/2020, which consists of: 71 Agencies, 12 Workers Organizations, 13 External Organizations, 19 Representative</p>	

Local Communities, 9 Contractor, and others. The document also attached with the address, name of the representative and destination number that can be contacted via telephone.

Based on the results of verification during surveillance-1.1, the company has appointed SQM staff (on behalf of Linggar Eko) as the person responsible for the management recapitulation of compulsory reporting evidence to related agencies. For example, the mandatory documents that have been sent to the relevant agencies are as follows:

- Hazardous Waste Report IV (October to December 2019) on February 5th, 2020.
- Land fire Prevention Report on March 12th, 2020.
- HGU Utilization Report on March 13th, 2020.

Based on surveillance-1.1 assessment, whole previous land compensation documents can be shown and maintained in the Legal Division office (Plantation Services Department in South Riau Area Controller office and in Jakarta Head Office).

1.1.3

From the results of the document review of the request for information, there was no record of requests for information from relevant stakeholders, there were only incoming letters related to fund requests from many stakeholders, such as: Military Office and Nurul Jihad Mandah Mosque Caretaker.

Based on interview with surrounding village officials, if they need information, they will submit a letter to the company. According to them, the company always responds each letter submitted.

Status: Comply

1.2

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

1.2.1 & 1.2.2

CH has code of conduct No. 440/HRM-COC/07 dated 24th May 2007, available in Indonesian Language. This code of conduct explains that CH has a commitment to building a mutually beneficial long-term relationship with stakeholders, such as optimally enhancing shareholder value, treating employees equally in all aspects. Does not engage in political activity and is not affiliated to the political party nor does it make any contribution concerning political activity and is not allowed to provide, offer or accept anything of value which may be categorized as a bribe to or from customers, angry providers & services or government officials and others so Influence the desired decision. Based on interview with workers, labor union, representatives of gender committees, as well as local contractor known that they understood about code of integrity and ethical behavior.

it is known that the certificate holder routinely conducts inspection or monitoring activities according to the operational procedures (including work ethic implementation) performed by Internal Audit Division and daily inspection by each supervisor in each division / department.

Based on interview with Local Contractor, Labor Union, Gender Committee, as well as the workers in Estates, they have received information about the code of integrity, and there are no violations related to this.

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.

There are regulatory compliance list specified in the regulatory compliance evaluation PT BNS were updated in January 2020, this document informs the rules, descriptions, compliance status, compliance evidence and note consists of 147 regulations, For example:

- Decree of the Governor of Riau No. Kpts.661/III/2019 dated 25 March 2019 about Minimum Wage on Agriculture and Plantation Sectoral year of 2019 is Rp 2,820,000. There are also Letter from *Badan Kerja Sama Perusahaan Perkebunan Sumatera* (BKS PPS) with number 19/BKS-PPS/2019 dated 1 March 2019, subject: an increase in the

plantation sector minimum wage year of 2019 in Riau Province to all members of the Sumatera Plantation Company. The lowest wage for daily workers is Rp 2,679,000 including rice allowance (15 Kg) or Rp 141,000.

- Minister of Manpower Regulation No.5 of 2018 concerning occupational safety and health in the work environment.
- Regulation No. 7 of 2019 concerning occupational diseases.
- Minister of Forestry Regulation No. P20 of 2018 concerning protected plant species.
- Minister of Agriculture Regulation No. 5 of 2018 concerning the opening and / or processing of plantation land without burning.
- Minister of Agriculture Regulation No. 01 of 2018 concerning guidelines for determining the purchase price of oil palm FFB for plantation and other products.

Regulation on legal requirements compliance and its documentation management is presented in document No.724 / TQEM-SPMS / 09 Chapter 1.2 and 701 / TQEM-ESH / 10 which mentioned that the PSD and PSQM Department has responsibility for conduct monitoring, identification, update and evaluate regulations pursuant minimum by internal audit every year. Those responsibilities shall be coordinated together with other teams such as the legal team, OSH team, etc. Evaluation of compliance with PT BNS regulations, updated in January 2020, this document informs regulations, description, fulfillment status, proof of compliance and information consisting of 147 regulations.

2.1.3.

The company shows inventory data for the boundary stones inventory which informs the boundary stones number, location, type of boundary stones, coordinates (latitude & longitude) and boundary stones conditions. For example: 4 Main boundary stones (BNS 77, BNS 84, BNS 88 & BNS 95) and 15 supporting boundary stones in good condition.

The socialization of boundary stones maintenance is available to MDE staff and the community of Parit Gurah Batu, November 25, 2019, attended by 25 people, the purpose of the training is to provide understanding to village communities around the company area and company employees in maintaining boundary stones.

Based on field visit at boundary stones number BNS 84, BNS 77, and BNS 50 block H38, it was in good condition and has been accordance with HGU Map.

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 & 2.2.3.

All FFB come from own estates and group plantations. The company does not receive the fruits from the outside. There is contractor for development of housing in Mandah Factory, CV Hengheng with number of CLA 007/Barak/BNS-MDF/IV/2018 date on April 23, 2018 with address at Merbau Road, number 19, Selat Panjang, Riau. Based on interview with CV Heheng, There are no workers under the age of 18 years old. There is socialization related Human rights, prohibition on employing children and others.

2.2.2.

Evidence observed:

The company shows the CLA between the company (first party) and the Contractor (CV Hengheng / second party) with number 007 / Barak / BNS-MDF / IV / 2018 dated April 23, 2018. In article 6 regarding the stages and manner of payment each copy of payment transfer is explained will be submitted to the second party and then the second party must immediately issue a receipt to be submitted to the first party. Transfer and receipt of evidence that would be an attachment which is an integral part of this agreement.

In addition, to ensure compliance with regulations by the contractor, the company has a SOP for Contractor Work Regulations with document number 037 / BNS-KON / 18 No. revision 00 dated January 1, 2018. At point (h) the management unit will monitor the number of contractors, a list of workers names contractor, validity period of CLA and license (SIM / SIO) for work that requires these requirements.

- Interviews with representatives of the management, payment receipts can not be shown due to PIC is responsible

for not being in the Central Office. So the data cannot be shown yet.

- Results of the RSPO internal audit conducted on January 13-24, 2020, it is known that evidence of payment has not been shown.

Non-Conformance Description:

Based on the explanation above, the management unit has not been able to showing that the system regarding the fulfillment of applicable legal obligations including evidence of payment of contractors and contractor workers is in accordance with applicable regulations. This is a **non-conformity No.2020.01 with Non-Critical category indicator 2.2.2.**

Non-critical 2.2.2	Status: Non-conformity No.2020.01 with Non-Critical category indicator 2.2.2.	
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2.3 All FFB supplies from outside the unit of certification are from legal sources.

2.3.1 & 2.3.2.
The Company did not receive the fruits from the outside, FFB received from the company core Estates and group plantations consist of; Teluk Bakau Estate, Nusa Perkasa Estate and Nusa Lestari Estate.

	Status: Comply	
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PRINCIPLE #3 OPTIMISE PRODUCTIVITY, EFFICIENCY, POSITIVE IMPACTS AND RESILIENCE

3.1 There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.

3.1.1; 3.1.2; 3.1.3
The management plan at estate level was evidenced with a document of Economic Indicators for Estate (5 Years) from 2020 – 2024 which include projected OER and KER, FFB Production, Pesticide usage, production cost projection, and revenue projection. The document consists of capital expenditure (buildings, plant and machinery, etc.), indirect cost (salaries, fees, medical, etc.), and operational cost of plantation activity.

An evaluation related to the long-term plan made is carried out every year to guarantee the continuation of the plantation business, for example for the 2020 fiscal year, an evaluation has been made on the achievement of the stipulated budget such as for estate units regarding Estate Production / Yield Statement, Capital Expenditure Details, Breakdown Capital Expenditure, Employee Statement, Housing Facilities, Vehicle & Agriculture Equipment and Manuring Program.,

The company also had program for replanting (for the next 5 years) for each estate, for examples: 844 ha in 2021 and 1.360 ha in 2022.

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

3.2.1
The company presented an internal audit document of the RSPO PT BNS - Mandah Factory, dated 13 to 24 January 2020, which identified several discrepancies. For example:

- Indicator 3.6.1 The HIRAC document does not cover all activities in the Mill and Estate. HIRAC collection has been shown with document number 7301 / PSQM-ESH / 11 which was updated on January 21, 2020 with the addition of work using mechanical harvesting equipment, maintenance of HGU stakes, fire towers, Hazardous Waste Temporary Store
- Indicator 4.3.1 CSR programs and realization in 2019 have not been demonstrated. CSR programs and realization for 2019 have not been demonstrated on March 12, 2020.

3. Indicator 6.7.1 The Certificate of Appointment of Occupational Health and Safety Expert (*SKP AK3*) on behalf of Dellie Martha has expired. The corrective action is by replacing the Occupational Safety and Health Committee (*P2K3*) Secretary with a Certificate of Appointment of Occupational Health and Safety Expert that is still active during the processing of the Certificate of Appointment of Occupational Health and Safety Expert behalf of Dellie Martha. Improvements to completion on March 12, 2020.
4. Indicator 6.1.5 Indicator 6.1.5 The gender meeting document cannot be shown for 2019. This was fulfilled on 13 February 2020 with the structure, program and realization of the gender committee being carried out on 13 April 2019.

Based on interviews with the company's sustainability team, that the review related to the findings on the internal audit will always be reviewed the achievements made by the company's internal team. In this case the company showed the minutes of a meeting to discuss the achievement of improvement on February 13, 2020 which was attended by 40 company employees.

3.2.2

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.

The certificate holder has a documented procedure for the mill and plantation. The plantation procedure starts from the plant material procedure, then the technique of nursery, fertilization, weed control, integrated pest management to harvesting and its transport is stated in the document of Standard Operating Procedure (SOP) of *Referensi Manual Agronomi Penanaman Kelapa Sawit*, document number 110 / EST-ARM / 13, September 2013 signed by the Head of Upstream Plantation Indonesia. This document has been distributed on September 16, 2013 to all plantation and factory unit leaders. The certificate holder also has procedures for the process of receiving fresh fruit bunches to send the CPO and kernels listed in the document of *Pedoman Teknik Pabrik Kelapa Sawit* of the Part I and II palm oil mills Minamas Plantation dated April 30, 2007.

Generally, operational procedures have been socialized to all employees in accordance with their respective fields of work. Based on field observations at Mandah and Rotan Semelur Estate on harvesting and pesticide application, found that employees can show how to work in accordance with existing procedures, such as harvest workers can explain the criteria of the harvest and spray workers can explain the workings of the start preparation until finish of work.

The certificate holder routinely conducts activities of inspection or monitoring of activities in accordance with the operating procedures carried out by direct supervisors of the workers, for example the foreman, foreman I, assistant, senior assistant, manager and so on. There are some records of the monitoring activities of SOP implementation by the company, for example:

- Report of the Minamas Management Committee Meeting held in December 2019.
- Records of the Conclusion Examination Working Paper (LK3P) conducted on June 28, 2019.

CH also monitored all contractor performance based on company policy or procedure (SOP for Contractor Work Regulations with document number 037 / BNS-KON / 18 No. revision 00 dated January 1, 2018). For example, for a local contractor for housing in Mandah Mill (CV Heheng), a field inspection is carried out related to the completeness of PPE, administrative completeness and health insurance.

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 BNS has environmental documents and impact analysis in the form of:

- Mandah and Rotan Semelur Estate have been included in the scope of Environmental Evaluation Studies for Plantation PT. BNS 1996;

PT BNS has an environmental document in the form of an Environmental Evaluation Study for the estate and factory of Bakau Bay Estate. The document was validated by the Department of Agriculture, Agribusiness Agency with certification number 07 / BA.5.3 / V / 1996 concerning the approval of PT. Bhumireksa Nusasejati on May 17, 1996.

As a continuation, PT BNS also has RKL-RPL documents that have been approved by the Minister of Agriculture through letter number 093 / RKL-RPL of PT Bhumireksa Nusasejati dated May 14, 1996.

The issue of fire environment, peat land subsidence, and pier construction caused PT BNS to revise the RKL-RPL conducted in 2006 and was approved by the Head of the Environment, Mining and Energy Office of Indragiri Hilir Regency Number: 11 / IH / RKL-RPL / V / 2006 dated May 3, 2006.

- UKL- UPL document for Mandah Palm Oil Mill.

Mandah Palm Oil Factory environmental documents use UKL-UPL documents that have received approval from the Department of Environment, Mining and Energy, InHil District with no. 660 / DLHPE-PDL / XI / 2008/289 dated 13 November 2008 concerning the Approval of UKL-UPL An. PT BNS for a Palm Oil Mill with a capacity of 45 tons / hour in Bente Village, Mandah District, InHil Regency which contains: Description of the Activity Plan; Environmental hue; Environmental impacts that will occur; Environmental Management Efforts; Environmental Monitoring Efforts; and reporting.

The Mandah and Rotan Semelur Estate have been included in the scope of the Environmental Evaluation Study for Plantation PT. BNS 1996. In 2006 a revision of the RKL and RPL documents was made and the Revision included a plan for the management and control of significant environmental impacts, namely: (1) Decreasing air quality; (2) Declining Peat Surface (3) Potential forest and land fires; (4) Declining river water quality and disturbance of aquatic biota; (5) Anxiety / social conflict. The revised RKL and RPL documents were approved by the Head of the Environment, Mining and Energy Office of Indragiri Hilir Regency Number: 11 / IH / RKL-RPL / V / 2006 dated May 3, 2006.

The PKS environmental document Mandah uses UKL-UPL documents which have been approved by the Department of Environment, Mining and Energy, InHil District with no. 660 / DLHPE-PDL / XI / 2008/289 dated 13 November 2008 concerning the Approval of UKL-UPL An. PT BNS for PKS Mandah Palm Oil Mill.

The company has submitted the second semester UKL / UPL Report July - December 2019 PKS Mandah dated February 5, 2020 (No 014 / BNS / MDF / II / 2020) to the Department of Environment and Sanitation Indragiri Hilir Regency.

The company has had a Social Impact Program for the 2019-2020 period which is compiled based on a questionnaire that has been distributed to the communities surrounding the company. For this questionnaire distributed to 43 people who came from the Rotan Semelur Village, Bente Village and Teluk Bunian Village. The questionnaire contained an assessment related to the impact of the company's presence on the community around the plantation area, for example employment opportunities for the community, assessment of environmental management by the company, and education, health and other social programs.

The preparation of the social impact program was reviewed and jointly evaluated between the company and the community on November 11, 2019 which was attended by representatives of the company and 1 village head and 39 community members. In this meeting resulted in several agreements including the 2020 CSR Program which will be rearranged based on requests / needs from surrounding communities, submission of complaints can now be submitted to the public relations of PT BNS. All requests for assistance to the company will be reviewed based on the condition of the company's financial capability.

3.4.2

PT BNS has an environmental document and impact analysis in the form of a UKL - UPL document for the UPL Mandah Palm Oil Mill which has been approved by the Department of Environment, Mining and Energy, InHil District with no. 660 / DLHPE-PDL / XI / 2008/289 dated 13 November 2008 concerning the Approval of UKL-UPL An. PT BNS for a Palm Oil Mill with a capacity of 45 tons / hour in Bente Village, Mandah District, InHil Regency which contains: Description of the Activity Plan; Environmental hue; Environmental impacts that will occur; Environmental Management Efforts; Environmental Monitoring Efforts; and reporting. Efforts to monitor and manage this impact are always carried out by the company every 6 months and reported to the government.

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CSR realization report of PT. BNS July-December 2019 period (01 / BNS-UM / I / 2020) on 10 February 2020 to Indragiri Hilir District Estate Crops Office and Indragiri Hilir District Labour and Transmigration Office.

Programs that have been realized in 2019, for example:

- Social and Community Affairs (co: Electricity Assistance for the houses of the people of Rotan Semelur Village, Mekar Karya Hamlet, Sabar Menanti Menanti, Teluk Dalam Trench, Youth Trenches, Perit Sabar Menanti waiting for 200 families.
- Religious Affairs, Sacrificial Cow Assistance for Kateman, Pelangiran and Mandah Districts. (170M)
- Education Sector in the form of honorary teacher assistance for Rotan Semelur Village (MTs Darul Hikmah).

Status: Comply

3.5

A system for managing human resources is in place.

3.5.1

The Certification unit has employee's recruitment procedure number SOP Recruitment (No. Policy: 431/HRM-RCT/07) dated 24 May 2007. The recruitment in accordance to request to fill in shortage or replace employee stops; additional request using the labor requirement form; the process of selection, interview, and medical checkup. There are several sample of temporary workers agreements, for example: agreement number 01/EST-MDE/DIV.II/II/2019 dated 11 March 2019 on MDE; agreement number 010/PKWT/MDF/IX/2019 dated 22 September 2019 on MDF.

3.5.2.

The certification unit shows the Job Performance Appraisal Procedure, based on the Indonesian Plantation Upstream Head Memorandum number 287-HRM-i1-V-11. Consists of Implementation Performance Appraisal thoroughly, carefully and objectively, score and final value evaluation, assessment letter rating, submission result of performance appraisal. The RSE unit showing an example of the proposal dated 4 December 2019 for the appointment 26 harvesters from temporary workers to be permanent worker. Appointment letter has realized on February 2020, for example: appointment letter number RSE/092/II/2020/S regarding the appointment of permanent worker (initial AZW as harvester).

Status: Comply

3.6

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

3.6.1

There is no change of safety policy, which presented in Head Plantation Upstream Indonesia dated December 2011. The Company is committed to provide a safe working environment for all employees and visitor, as well as strive to facilitate a proper protection for workers and company access which aims to avoid accident and damage incidence. Procedure of Hazard Identification Risk Assessment and Control (HIRAC) is presented in procedure No. 7301/PSQM-ESH/11 dated 07 July 2011. The certification unit is able to shows HIRAC document which issued by the respective OSH Committee Secretary and Estate/Mill Manager. Training of first aid in all unit is delivered by company doctor annually. This is confirmed during interview with Foreman in all units. Furthermore, company management is able to shows investigation and evaluation of accident.

3.6.2

The certification unit has conducted effectiveness of OHS plan monitoring by monthly OHS meeting, monthly OHS inspection, lost time incident monitoring and also annual medical check up for the high-risk workers. The latest meeting in Mandah Estate on December 2019 discuss about Safety Hazard Observation Card to inspect unsafe condition or unsafe action. Therefore, annual medical check up to 53 workers and operator were conducted in MDF on October 2019. The check up consists of physical, laboratory, spirometric, audiometric and ischiara. In addition, the certification unit has monitor loss time incident with result: MDF: zero accident, MDE (FR: 18, SR: 28) and RSE (FR: 7; SR: 8).

Status: Comply

3.7

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

3.7.1

The certification unit has training program year of 2020 for all staff and stakeholders including local contractors on each of estates and mill. There are training for boiler operators, water treatment operator, turbine operator, kernel station operator, press station operator and SCCS in MDF. Training program in Estates such as: safe harvesting technic, safe manuring practices, pesticide application training, Integrated Pest Management, safe transporting practices, first aid training, fire drill and emergency response preparedness. The management unit also has implemented all of training program on the year 2019, for example: harvesting training on June 2019, IPM training on November 2019 and first aid training in MDF on February 2019.

3.7.2.

The certification unit has conducted and keep the training record, such as: safe harvesting technic dated 17 June 2019, safe manuring practices dated 10 October 2019, pesticide application training dated 7 September 2019, Integrated Pest Management dated 13 November 2019, safe transporting practices dated 8 August 2019, first aid training dated 5 August 2019 and emergency response preparedness dated 14 August 2019. In addition, there is record of training in MDF during last year, as follows: fire drill dated 11 June 2019, first aid training 11 February 2019, SCCS training dated 29 September 2019, and others. Therefore, based on interview with several workers on mill and estates sighted that the company has conducted training in accordance to their job description and procedures.

3.7.3.

Based on document verification sighted that MDF has conducted SCCS training to boat operator, grading officer, weighbridge operator and laboratory analyst on 20 September 2019. Therefore, based on interview with grading officer

and weighbridge operator on MDF sighted that they had been aware about SCCS procedure.

Status: Comply

3.8

Supply Chain Requirements for Mills

3.8.1.

Mandah Factory only applied Identity Preserved (Module D) for CPO mill.

3.8.2.

Mandah Factory only applied Identity Preserved (Module D) for CPO mill.

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 st , 2019 – March 31 st 2020.	Actual production (March 1 st , 2019 – Feb 28 th , 2020)
FFB	108,686	85,753.58
CPO	24,418	19,211.10
PK	5,495	4,654.33

3.8.4.

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

- Member Name: PT. Bhumireksa Nusasejati
- Account UID: RSPO_AC1000001410
- Core Product: Palm Oil
- Member ID: RSPO_PO100001381 since 8 September 2004.
- Member Category: Oil Mill.

3.8.5.

Mandah Factory have an update procedure of RSPO SCCS Certification Standard number 027/BNS-SCCS/12 Revision number 01 dated April 9, 2018 has been approved by Mill Manager and Estate Manager. This procedure contains related

- Palm oil products will go through many stages of production and logistics between the owner, the process and the product. Each oil product and palm kernel can be traded through the choice of Identity Preserved (IP) and / or Mass Balance (MB) according to the supply chain mechanism approved by the RSPO. In the procedure this supply chain mechanism established at PT Bhumireksa Nusa Sejati is Identity Preserved (IP).
- Processing of the FFB Certificate from the point of receiving raw materials to the storage process, and delivery of products, namely Certified Sustainable Palm Oil (CSPO) and Palm Kernel IP both physically and in the Office Administration.

According to point 6, the people in charge of the supply chain system are:

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

- Production clerk: recording the administration of the receipt certified FFB and the non-certified one.

The company ensured that the Fruit Delivery Certificate (SPB) and the Weigh Tickets were labeled (stamped) in accordance with the memorandum of RSPO Supply Chain System No.002 / PSQM-UM / II / 2013 dated February 27, 2013 (**Observation**).

3.8.6.

Based on procedure of RSPO SCCS Certification Standard number 027/BNS-SCCS/12 Revision number 01 dated April 9, 2018 point 8, The unit must carry out an internal audit at least once a year. Internal audit is carried out at least 2 months before an external audit is carried out. Findings of nonconformities in the internal audit must be included in the issue for corrective action. Internal audit results and all corrective actions and corrections must be included in the management of the review carried out at least once a year. The organization must be able to maintain records and reports from internal audits. Internal audits are scheduled and implemented by the PSQM Department. There is internal audit SCCS date on January 23, 2020 by PSQM Team. There are 5 non-conformity and has been follow up by PSQM team.

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 (ton)			PK Production (ton)		
	Cert	Non-Cert	Total	Cert	Non-Cert	Total
March	1,668.90	0	1,668.90	381.90	0	381.90
April	1,642.99	0	1,642.99	379.46	0	379.46
May	1,566.84	0	1,566.84	347.79	0	347.79
June	1,504.78	0	1,504.78	330.12	0	330.12
July	2,037.16	0	2,037.16	457.70	0	457.70
August	1,767.18	0	1,767.18	485.14	0	485.14
Sept	1,447.84	0	1,447.84	405.76	0	405.76
October	1,578.01	0	1,578.01	445.43	0	445.43
November	1,384.01	0	1,384.01	414.58	0	414.58
Dec	1,472.29	0	1,472.29	326.81	0	326.81
Jan	1,591.05	0	1,591.05	349.01	0	349.01
Feb	1,550.05	0	1,550.05	330.65	0	330.65
Total	19,211.10	0	19,211.10	4,654.33	0	4,654.33

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: sales contract number 00003/BNS/KTR-IKS/LOK/X/2019 for Palm Kernel, delivery period on October-November 2019 as much as 1,000,000 kg, name of buyer, delivery order number and stamped of RSPO Certified Identity preserved.

3.8.9.

There is Collective Letter agreement between Company with contractor CPO & PK, example: No.164/FN-QSP/VIII/2019 PT Quadra Samudra Perkasa date on August 17, 2019, commodity of CPO and number TBP-Bahari25-112019-01 PT Trasindo Bahari Perkasa date on Sept 20, 2019. The commodity is PK. There is agreement letter between PT Quadra Samudra Perkasa with unit management date on March 13, 2020 number 003/BNS-MDF/III/2020 its stated that the Certification body can check directly to the transporter to verify the data provided by PT. Bhumireksa Nusasejati it was signed by both parties. PT Trasindo Bahari Perkasa and Unit management has agreement letter with number 018/BNS-MDF/III/2019 date on March 11, 2019 it its stated that the Certification body can check directly to the transporter to verify the data provided by PT. Bhumireksa Nusasejati it was signed by both parties.

3.8.10.

There is list of contractors of CPO & PK such as:

Name of contractors	Address	PIC & contact number	Information
PT Mitsi Citra Mandiri	Jl. Raya Pelabuhan II St. No. 10 Belawan	061-6943333 Yo'Eddy MT	CPO
PT Pelayaran KJ Marine	Jln. Bisma Raya Blok C2 No.1 kel. Papanggo Tanjung Priok jakarta Utara	021-29562338	CPO
PT Trans Samudera Mandiri	Jln. Tentara Pelajar, Perkantoran Permata Senayan, Blok E 22, Patal Senayan, Jakarta Selatan	021-57940902 Jati Bakara	CPO
PT Quadra Samudera Perkasa	Komp. Ruko Mall Fantasi Blok FJ 1 No. 01 Balikpapan Baru	0541-8515883	CPO
PT Pelayaran Sinar Pagoda	Jln. Tiang Bendera II No. 92 Jakarta	021-6911872 Theresia	PK
PT Trasindo Bahari Perkasa	JL YOS SUDARSO No.88 Depan Terminal Peti Kemas Panjang - Bandar Lampung 35241	0721-341451 Sumiati	PK

3.8.11.

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

3.8.12.

Production and sales 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)	CPO Sales		Total	PK Sales		Total
	Certified	Certified	RSPO	Conventional		RSPO	Conventional	
March	1,668.90	381.90	0	2,289.64	2289.644	0	495.288	495.288
April	1,642.99	379.46	0	0	0	0	650.458	650.458
May	1,566.84	347.79	0	3,298.18	3298.18	0	581.688	581.688
June	1,504.78	330.12	0	1,641.55	1641.55	490.08	0	490.08
July	2,037.16	457.70	0	0	0	0	0	0
August	1,767.18	485.14	0	3,227.56	3227.561	0	0	0
Sept	1,447.84	405.76	0	1,669.83	1669.833	1,001.52	0	1001.524
October	1,578.01	445.43	0	0	0	0	0	0
November	1,384.01	414.58	1,897.58	2,878.56	4776.141	643.494	0	643.494
Dec	1,472.29	326.81	0	0	0	0	0	0
Jan	1,591.05	349.01	0	0	0	745.32	0	745.32
Feb	1,550.05	330.65	0	1,000.88	1000.88	0	0	0
Total	19,211.10	4,654.33	1,897.58	16,006.21	17,903.79	2,880.42	1,727.43	4,607.85

3.8.13.

Mandah POM 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.

3.8.14.

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3.8.15.

Organization applying RSPO SCCS Module D (Identify Preserved).

3.8.16.

Based on transaction data on March 1, 2019 – February 29, 2020 and Palm Trace date on March 2020 it knows:

Products	License Volume (April 1st 2019 - March 31st 2020) (MT)	Conventional sales (MT)	Volume allocated as credits (MT)	Volume sold as physical (MT)	Remaining Volume (MT)
CSPK	5,231	1,727.43	0	2,880.44	622.56
CSPO	23,138	16,006.21	16,006	1,897.58	5,234.42

The company makes sure to monitor conventional sales data and is sure to be removed before the external audit activity is carried out (**Observation**).

3.8.17.

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

Status: Comply

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.

The Certification unit was showing Sime Darby Plantation Human Rights Charter (revised 2019). The policy has in line with the Act No. 39 in 1999. Human rights in CH perspective has covers employees prosperity, freedom in religion implementation, non-discriminative treatment towards gender, ethnic and social background, opportunity of self improvement, transparency of information, etc. socialization of policy had been conducted to worker and contractor representatives annually, for example: socialized to all MDF workers and contractor dated 1 October 2019, and also to all MDE workers dated 7 December 2019. Based on interview with community representatives from Village of Bente Dusun Parit Berayun II, as well as workers in Mill and Estates, it was known that there are no negative issues related to human rights in company operational areas.

4.1.2.

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

Status: Comply

4.2

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

4.2.1.

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

4.2.2

Based on field observation and interview with several workers and union board sighted that there is no complaint from workers to the company. All workers also have 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 is no complaint during period of 2019/2020. In addition, based on interview with communities from Bente Village, Dusun Parit Berayun II sighted that there is no complaint to the company.

Status: Comply

4.3

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

4.3.1

The company has had a Social Impact Program for the 2019-2020 period which is compiled based on a questionnaire that has been distributed to the communities surrounding the company. For this questionnaire distributed to 43 people who came from the Rotan Semelur Village, Bente Village and Teluk Bunian Village. The questionnaire contained an assessment related to the impact of the company's presence on the community around the plantation area, for example employment opportunities for the community, assessment of environmental management by the company, and education, health and other social programs.

The preparation of the social impact program was reviewed and jointly evaluated between the company and the community on November 11, 2019 which was attended by representatives of the company and 1 village head and 39 community members. In this meeting resulted in several agreements including the 2020 CSR Program which will be rearranged based on requests / needs from surrounding communities, submission of complaints can now be submitted to the public relations of PT BNS. All requests for assistance to the company will be reviewed based on the condition of the company's financial capability.

The company has carried out the realization of the social impact program in 2019 which is located in Bente Village, Mandah sub-District, including :

- The company has repaired a wooden bridge connecting the Brayon 1 ds and the company boundary, but there is a need for repairs and requests from the community to be made into a permanent (made of iron) bridge (verbal delivery).
- The company has made a reservoir in Brayon 2 village. In anticipation of fires in Brayon 1 Village and Brayon 2 Village, this is following up on requests from the community for the construction of ponds or ponds that are used as water sources.

As well as several programs that have been realized in 2019, for example:

- Social and Community Affairs (co: Electricity Assistance for the houses of the people of Rotan Semelur Village, Mekar Karya Hamlet, Sabar Menanti, Teluk Dalam Trench, Youth Trenches, Parit Sabar Menanti for 200 families.
- Religious Affairs, Cow for Qurban on Kateman Village, Pelangiran and Mandah Districts. (170M).
- Education Sector in the form of teacher honorary for Rotan Semelur Village (MTs Darul Hikmah).

Status: Comply

4.4

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

4.4.1; 4.4.2; 4.4.3; 4.4.4; 4.4.5 & 4.4.6.

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

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

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

Based on the audit, total area that supplied to Mandah POM were **12,366.18 Ha**. In fact, some area was occupied by villagers. Unit management is in the process to remove the occupation area from the HGU. Until the surveillance audit,

HGU's revision still awaiting confirmation from national land agency. Based on interview with unit management it will take time until 8 years. Based on interview with Land National Agency, this decision to determine the *HGU* is at the provincial regional office.

Land Right and Legality

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

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

During the surveillance audit, there is no land compensation process. Whole previous land compensation documents are maintained in the Legal Division office (Plantation Services Department in AC Riau Selatan Office and in Jakarta Head Office). Based on interview with local community at Teluk Bente Village, Sub-Village of Parit Berayun II, there is no land dispute or issue between the locals and unit management.

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.

Based on document verification, field visit and interview with staff sighted that there is no new planting or new acquisition under Mandah Estate and Rotan Semelur Estate.

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.

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

During the surveillance audit, there is no land compensation process. Whole previous land compensation documents are maintained in the Legal Division office (Plantation Services Department in AC Riau Selatan Office and in Jakarta Head Office). Based on interview with local community at Teluk Bente Village, Sub-Village of Parit Berayun II, there is no land dispute or issue between the locals and unit management.

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

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

During the surveillance audit, there is no land compensation process. Whole previous land compensation documents are maintained in the Legal Division office (Plantation Services Department in AC Riau Selatan Office and in Jakarta Head Office). Based on interview with local community at Teluk Bente Village, Sub-Village of Parit Berayun II, there is no land dispute or issue between the locals and unit management.

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.

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

During the surveillance audit, there is no land compensation process. Whole previous land compensation documents are maintained in the Legal Division office (Plantation Services Department in AC Riau Selatan Office and in Jakarta Head Office). Based on interview with local community at Teluk Bente Village, Sub-Village of Parit Berayun II, there is no land dispute or issue between the locals and unit management.

Based on the audit, total area that supplied to Mandah POM were **12,366.18 Ha**. In fact, some area was occupied by villagers. Unit management is in the process to remove the occupation area from the HGU. Until the surveillance audit, HGU's revision still awaiting confirmation from national land agency. Based on interview with unit management it will take time until 8 years. Based on interview with National Land Agency, this decision to determine the *HGU* is at the provincial regional office.

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, 5.1.2, 5.1.3, 5.1.4, 5.1.5, 5.1.6

Until now there is no smallholder scheme (plasma) in PT Bhumireksa Nusasejati. All FFB received and processed at the Mandah Palm Oil Mill are from 2 Core namely Mandah Estate (MDE) and Rotan Semelur Estate (RSE).

5.1.7

The company has calibrated the weighbridge, this is proven by the Inspection Result Certificate Number: 001 / SKHP / Disdagtri-BIDKMET / I / 2020 dated January 6, 2020 issued by the Department of Trade and Industry of Indragiri Hilir Regency and will be carried out again at 05 January 2021. For the work of repeating the Mandah Factory weigh bridge PT. BNS is carried out by PT. Teras Salim Indomas and authorized by the Indragiri Hilir Regency's Office of Trade and Industry.

5.1.8, 5.1.9

Until now there is no smallholder scheme (plasma) in PT Bhumireksa Nusasejati. All FFB received and processed at the Mandah Palm Oil Mill are from 2 Core namely Mandah Estate (MDE) and Rotan Semelur Estate (RSE).

Status: Comply

5.2

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

5.2.1, 5.2.2, 5.2.3, 5.2.4

The CH does not have smallholders scheme.

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 and contractors dated 23 February 2019. Based on interview with several workers in Mill and estates sighted that the Social Policy had been implemented well.

6.1.2

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

6.1.3.

The Certification unit has employees recruitment procedure number SOP Recruitment (No. Policy: 431/HRM-RCT/07) dated 24 May 2007. The recruitment in accordance to request to fill in shortage or replace employee stops; additional request using the labor requirement form; the process of selection, interview, and medical checkup. There are several sample of temporary workers agreements, for example: agreement number 01/EST-MDE/DIV.II/II/2019 dated 11 March 2019 on MDE; agreement number 010/PKWT/MDF/IX/2019 dated 22 September 2019 on MDF.

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 each unit, for example RSE Gender Committee chaired by Elin Yulianti. 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.

6.1.6.

The Certification unit has paid each worker with equal wages for the same scope of the work. Based on interview with union board sighted that adjustment increasing of wage conducted on April last year. There are Inter-Office Mail from Head of Human Resources Management number 029/HRM-i3/III/2019 dated 1 March 2019 about permanent worker wages system in year of 2019 is Rp 2,679,000/month, and rice allowance Rp 141,000/month (15 Kg). The auditor team also has verified sample of increasing wages period January till April 2019 that paid on May 2019 with total Rp 178,302,960. In addition, there also sample of wage slip on February 2020 is still in accordance to minimum wage year of 2020.

Status: Comply

6.2

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

6.2.1; 6.2.3.

Collective Labour Agreement (CLA) of the company has refers to Period 2018-2020 dated 4 July 2018 which formulated by "Badan Kerja Sama Perusahaan Perkebunan Sumatera" (BKS-PPS) and "Pengurus Pusat Federasi Serikat Pekerja Pertanian Dan Perkebunan Serikat Pekerja Seluruh Indonesia" (PP.FSP.PP-SPSI). The CLA has covers regulation reference, company policy, work relationship, leave and permission, salary payment, welfare and insurance, business trip allowance, disciplinary, mutation, work termination, grievance and complaint and others.

6.2.2.

Based on document verification sighted that the certification unit only have permanent workers and specific time workers (PKWT). All rights of permanent workers have been covered on the CLA, while PKWT rights are contained on each agreement. 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 01/EST-MDE/DIV.II/II/2019 dated 11 March 2019 on MDE; agreement number 010/PKWT/MDF/IX/2019 dated 22 September 2019 on MDF. The management unit has monitor the progress of the appointment of PKWT workers into permanent workers. For example: promotion from PKWT to permanent workers such as: 29 harvesters in RSE dated 4 December 2019 and also 31 harvesters in MDE dated 13 November 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 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 Capex in MDE for housing G-6. Based on interview with CV Hengheng MDF as housing complex contractor sighted that their worker were provide a proper temporary living space in near of MDF. While during this assessment, there are no contractors on the estate unit.

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: MDE: Rp 4,509,529; MDF: Rp 3,879,874; RSE: Rp 4,925,381.

6.2.7

Based on document verification sighted that the certification unit use permanent workers and PKWT workers. There are 309 permanent workers and 112 specific workers (PKWT) in MDE, 100 PKWT and 401 permanent workers in RSE; and 102 permanent workers in MDF.

Status: Comply

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.

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

6.3.2.

The certification unit has labour union meeting record, latest bipartite meeting was conducted on 14 February 2020 attended by all labour union from each unit. This meeting was discussed about complaint of lose fruit picking system and variant of FFB volume between harvesting plat measure with weighbridge measure. Both of issues has been resolved by both of parties on the same time.

6.3.3

Based on interview with worker union board sighted that management didn't interfere in the formation of worker union. There are labour union organization on each unit, such as:

- RSE: it has been reported to the Department of Manpower and Transmigration, Indragiri Hilir No. 560 / DISNAKERTRANS-HISK / X / 2017/36 dated October 17, 2017 with the chairman of Zulmarwan Batubara; deputy chairman Fadil Wahyu; deputy chairman Saharuddin M, Secretary of Marizon; deputy secretary of Saiful Arif Nasuuton; and Treasurer Suherman
- MDF: registered with the Manpower and Transmigration Office of Indragiri Hilir No. 61 / NAKERTRANS-PKHI / 560 dated 18 March 2013 with the chairman: Ilyas, deputy: Mazelan, treasurer: Kasmadi. For the period of 2015-2020.
- MDE: it has been reported to the Department of Manpower and Transmigration, Indragiri Hilir No. 57 / NAKERTRANS-HISK / 560 dated November 23, 2018 with the chairman of Jakopan Sipahutar; Secretary of Wiji Irwanto; and Treasurer: Gunawan.

Status: Comply	
6.4 Children are not employed or exploited.	
<p>6.4.1. The Certification unit has employees recruitment procedure number SOP Recruitment (No. Policy: 431/HRM-RCT/07) dated 24 May 2007. The recruitment in accordance to request to fill in shortage or replace employee stops; additional request using the labor requirement form; the process of selection, interview, and medical checkup. The Certification unit has a policy on child labor, signed by CEO and in CLA also stated that the minimum age for workers is 18 years old. Therefore, based on interview with contractor sighted that for the 2020 contract, there are ban on child workers.</p> <p>6.4.2; 6.4.3 Based on field observation to MDE, RSE and MDF; 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.</p> <p>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 dated 9 December 2019.</p>	
Status: Comply	
6.5 There is no harassment or abuse in the workplace, and reproductive rights are protected.	
<p>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 right. Based on document verification sighted that the company has socialized this policy to the worker and contractor dated 23 February 2019 and 9 December 2019 respectively. Based on interview result with the women workers in the estates & mill, also interview with worker union and gender committee sighted that there are no harassment or abuse in the workplace. The certification unit has provided the menstruation leave and maternity leave for all women workers.</p> <p>6.5.3 The Gender Committee and the management has held a meeting on 4 December 2019, there were a number of inputs and suggestions including:</p> <ol style="list-style-type: none"> 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. <p>6.5.4. The mechanism, open to all affected parties, disputes resolution in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers (anonymity), where requested, as long as that information is supported with adequate initial evidence is following their procedure (Complaint Resolution Procedure). The certification unit also has had corporate code of conduct, where described that 'all employee can express their opinions and aspirations to the company and it will be respected and kept confidential'. This mechanism had been socialized to all workers on 9 December 2019.</p>	
Status: Comply	
6.6 No forms of forced or trafficked labour are used.	
<p>6.6.1 & 6.6.2 Based on document verification sighted that there are no migrant workers on this certification unit, there are only</p>	

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. Based on field observation, interview with worker union and several workers in estates and mill sighted that there are no workers from other region which recruit in workers homeland.

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

- P2K3 for Mandah Factory legitimation shows through Decree of Manpower Agency of Riau Province No. 605/Disnakertrans-PK/SK-P2K3/III/2019 dated 04 March 2019, with OSH Secretary was OSH Expert as shows through Decree on Minister of Manpower No. KEP.P.7833/NAKER-BINWASK3/IX/2017 dated 20 September 2017 (valid for 3 years).
- The Mandah Estate OHS expert is using Mr LEP with license number KEP.34256/NAKER-BINWASK3/XII/2018. They had been submit revision of P2K3 of Mandah Estate structure to the Man Power and Transmigration Agency of Indragiri Hilir Regency dated 14 January 2020.
- P2K3 for RSE legitimation shows through Decree of Manpower Agency of Riau Province KPTS.560/Disnakertrans/2019/189 dated 16 January 2019, with OSH Secretary was OSH Expert as shows through Decree on Minister of Manpower KEP.34256/NAKER-BINWASK3/XII/2018 dated 31 December 2018 (valid for 3 years).

Each of unit has been conducted monthly meeting, for example: latest meeting in RSE was conducted on 5 February 2019 attended by 15 members.

6.7.2.

Training of first aid in all unit is delivered by company doctor annually. For example, first aid training in Mandah Estate and Rotan Semelur Estate has conducted in 5 February 2020 and 17 February 2020, respectively. Based on observation to sampled estate, it was known that all Foreman were equipped by first aid kit. Furthermore, first aid kit box which installed on estate and mill buildings were satisfactory monitored. In addition, that, the certification unit has conducted investigation for work accident cases, there are only mild accident that's not causes lost time.

6.7.3.

Estate and mill management is able to shows monitoring on operator license as well as evidence on extension when expired, for example as shows in Letter No. 161/SK/AP/III/2018 dated 13 March 2019 for 3 Crane Operators Class 3 and 1 Operator Engine Room for Mandah Factory. License of water transport for 19 drivers, 1 OSH Crane Operators and 1 electrician in Mandah Estate are available. All licenses are mostly expired in 2020 and 2021. Furthermore, License of 1 operator of RB Crane, 2 operators of excavator, 1 welder and 1 electrician are expired in 22 April 2021 and 05 May 2021. Therefore, based on field observation to the mill operational and estates operational sighted that all workers were provided the adequate PPE's. That also available the block spraying system house in RSE and MDE sighted that the company provided sanitation place for spraying workers after work.

The annual medical check up to 53 workers and operator were conducted in MDF on October 2019. The checkup consists of physical, laboratory, spirometry, audiometric and ischihara. While the medical checkup on RSE & MDE were conducted dated 26 October 2019 and 1 November 2019 respectively. Based on that document sighted that all operators in mill and chemical applicator in estates on good condition and fit to work. Besides that, based on interview with store keeper, operator boiler and spraying team known that's medical checkup result been socialized to all workers.

6.7.4.

Based on document review and interview with workers in Mandah Estate, Mandah factory and Rotan Semelur Estate, it was known that all workers were covered by BPJS Manpower (BPJS-TK) and Health Insurance (BPJS-Kes). For example, BPJS Manpower of all units has been paid on 07 January 2020, meanwhile for BPJS Health, it has been paid on the same date. Based on interview with CV Hengheng sighted that their workers were covered by an insurance, they also can showing sample of insurance payment on January 2020.

6.7.5

The certification unit has monitor loss time incident during last year with result: MDF: zero accident, MDE (FR: 18, SR: 28) and RSE (FR: 7; SR: 8). The evaluation of loss time in OSH Committee meeting and quarter P2K3 report.

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

The company has work procedures related to chemicals such as spray work and pest control. The procedure is contained in the Agricultural Reference Manual (ARM) No. Policy 110 / EST-ARM / 13. Section 15 concerning plant protection from pests and diseases consisting of control of horn beetles, caterpillars, nettle caterpillars, rat pest control and Ganoderma control for base rot and stem rot diseases, Section 16 concerning general weed control. The estate management has a program of integrated pest management and its realization which presented in monthly committee meeting report.

7.1.2 & 7.1.3

From the results of document review, interviews and field observations, the company does not use certain species in order to control pests and diseases.

In addition, from interviews with management, field workers and the surrounding community, there was no indication of the use of fire material for pest control. From the results of field observations especially on replanting area, no burn marks were found from the area visited by the auditor.

Status: Comply

7.2

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

7.2.1, 7.2.2, 7.2.4, 7.2.5

The certificate holder has work procedures related to chemicals including spray work and pest control. The procedure is contained in the Agricultural Reference Manual (ARM) No. Policy 110 / EST-ARM / 13. Section 15 deals with the protection of plants from pests and diseases. In section 16 it also explains general weed control.

Each estate shows the document list of chemicals used in the estate, which explains trademarks, active ingredients, LD 50, properties and targets of weeds, for example trademark Kenlon 480 EC, active ingredients trichopir, active ingredient 480 g / l, LD 50 > 1480 mg / kg, systemic properties and target weeds, broad and narrow leaf weeds.

Unit certification already had the records of pesticides use in Document Monitoring Pesticide Usage per Hectare Period 2019. The document has included information about active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications.

From the document observations and interviews with officers in the chemical warehouse, each estate team auditor got information that no use of chemicals (pesticides) was used prophylactically. The use of pesticides is only done if the pest attack has passed the specified threshold. For example, the company used pesticides with cyphmetrin active ingredients for Mandah Estate (Field G018) in February 2020 because the census results had passed the threshold of >5 caterpillars (immature area).

The certificate holder does not use paraquat pesticides and pesticides that are classified as class 1A or 1B. This is confirmed by the policy not to use Paraquat as contained in the memorandum document from the Head Plantations Operation (number: POD-UM-127 / X / 2008, 4 November 2008) regarding Recommendations to Substitute the Application of Paraquat Active Ingredients in the Minamas Environment.

7.2.3

Unit of certification applying integrated pest management to collaborate on biological and chemical control. Use of chemical engineering was not done in a preventive, but based on the results of early warning systems that detect and census. Biological pest control is done by applying the development of natural enemy's owls to control the rat population. The development of useful plants like *Turnera subulata* and *Antigonon leptopus* also be used as a biological control technique as a nettle caterpillar predator live.

The company shows records of the use of pesticides for 2018 and 2019. From the results of the document review there is a reduction in the use of herbicides in the active ingredient of isopropyl amino glyphosate. There has been an increase in the use of insecticides in 2019 for replanting areas due to company procedures for controlling *Oryctes* pests with rotations once every 14 days.

7.2.6 & 7.2.9

Based on the results of interviews with spraying workers, it is known that the PPE is given free of charge by the company (Gloves, Apron, Glasses, and masks). Workers also keep and wash the work tools at the washers that have been provided at BSS House (not taken home appliance). Workers also understand the technical activities of workers by explaining technical work ranging from spraying, weed targeting, and avoiding spraying in riparian areas. Based on field observation the spraying team used appropriate PPE and in accordance with risk identification (HIRAC Document).

Document verification results and field observations at Mandah Estate and Rotan Semelur Estate, interviews with managers and spray workers, that the company does not carry out activities by applying aerial pesticides spraying. All pesticides are applied using the knapsack spray tool.

7.2.7

Based on the results of field observation in the central warehouse (agrochemical warehouse), in the Mandah and Rotan Semelur Estate it is known that the chemical materials are stored well, officers conduct periodic monitoring for each incoming and outgoing material as well as expired chemicals. For example, a chemical monitoring report for chemicals in 2019 made by a warehouse clerk and reported to the estate manager, found that there were several types of pesticides being monitored in the warehouse.

Based on interviews with Mandah & Rotan Semelur Estate spray and foreman workers, it is known that workers have understood the management of pesticide packaging, which is to be rinsed in a pesticide packaging container and then collected at an authorized hazardous waste storage. Based on the results of the field observation at the estate office, it is known that the washing place used by pesticide packages is at the estate office, the used washing water is collected and reused for mixing pesticides.

7.2.8

The company already has a Pesticide Storage SOP with (00 / SOP / PSTD /PT.BNS / EST / X / II / 2014) which was approved on 7 December 2014. Based on the explanation of several things such as

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

The results of the field visit to the MDE and RSE pesticide storage warehouse were found to be in accordance with the established storage procedures. The warehouse is equipped with symbols and MSDS.

Based on the results of field visits to MDE and RSE housing, it is known that there are no pesticide containers used for other purposes. used pesticide containers are stored in Temporary Storage of Hazardous and Toxic Waste and the amount is recorded and monitored.

7.2.10 & 7.2.11

The results of interviews with pesticide operators in Mandah Estate and Rotan Semelur Estate, submitted that all pesticide operators have been checked health periodically once a year cooperation with Company Paramedics. Last tested on October 2019 for Rotan Semelur Estate & November 2019 for Mandah Estate. Also, workers have known the results of the examination. Based on field observation, no worker has an indication of exposure to chemicals such as itching, skin irritation, poisoning or anything else.

The auditor conducted field observations and interviews with spray workers in the Mandah and Rotan Semelur unit, it was found that there were no pregnant workers and the workers knew the prohibition of breastfeeding and pregnant women from applying pesticides. The foreman also stated that if there are female workers experiencing signs of pregnancy then the person concerned will report to the foreman or staff and immediately go to the clinic.

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

The company shows identification of waste sources for the 2019 period including:

Type of Waste	Source of Waste	Potential for pollution	Information
Used oil	Genset & power pack hydraulic	Genset engine & hydraulic power pack	Performed and stored in Hazardous Waste Temporary Store and recorded on the Hazardous Waste logbook.
Used chemical sacks	WTP & Boiler	Water canals, land and living things around	Performed and stored in Hazardous Waste Temporary Store and recorded on the Hazardous Waste logbook
Used batteries	Genset engine & pompong machine	Water canals, land and living things around	Performed and stored in Hazardous Waste Temporary Store and recorded on the Hazardous Waste logbook
Used light	Palm Oil Mill, Office, housing employees & staff	Air and land	Performed and stored in Hazardous Waste Temporary Store and recorded on the Hazardous Waste logbook
Ragged contaminated cloth	Workshop, process employees (station) and laboratory	Water canals, land and living things around	Performed and stored in Hazardous Waste Temporary Store and recorded on the Hazardous Waste logbook
Contaminated gloves	Workshop, process employees (station) and laboratory	Water canals, land and living things around	Performed and stored in Hazardous Waste Temporary Store and recorded on the Hazardous Waste logbook.
Used filter	Generator and turbine engine	Water canals, land and living things around	Performed and stored in Hazardous Waste Temporary Store and recorded on the Hazardous Waste logbook.

Used paint cans	Process (station), workshop.	Water canals, land and living things around	Performed and stored in Hazardous Waste Temporary Store and recorded on the Hazardous Waste logbook.
Used jerry cans	Workshop and laboratory	Water canals, land and living things around	Performed and stored in Hazardous Waste Temporary Store and recorded on the Hazardous Waste logbook.
Used bucket	Workshop, laboratories, WTP dan boiler	Workshop, laboratory, WTP and boiler	Performed and stored in Hazardous Waste Temporary Store and recorded on the Hazardous Waste logbook.
Used sample bottles	laboratories	Workshop, laboratory, WTP and boiler	Performed and stored in Hazardous Waste Temporary Store and recorded on the Hazardous Waste logbook.
Solid decanter	Factory Operations	Solids and canal water	Carried out management
Shell	Factory Operations	Pollution / smoke and dust	Carried out management
Effluent Fruit Bunch	Factory Operations	EFB combustion fumes, dust and canal water	Burning is done in the incinerator
Fiber	Factory Operations	Pollution / smoke and dust	Carried out management

Estate

Types of Domestic waste	Sources of waste	Recommendations
Household Waste Housing	Housing	Household Waste Housing Disposes household waste into the space provided in each home and is transported by the janitor to landfill.
Used Plastic	Housing	
Waste Paper	Housing	
Used tin container	Housing	
Used glass container	Housing	

Types of Domestic waste	Sources of waste	Recommendations
Used oil	Generator machines, heavy and equipment and pompong.	Collect all used oil in Hazardous Waste Temporary Store

Used pesticide containers	Spraying activity and chemical warehouse	Punch holes in used pesticide containers so that they cannot be used anymore; rinse 3 times with clean water before storing, and collect and store all containers of used pesticides in the Hazardous Waste Temporary Store.
Used battery	Workshop activities, generator set, heavy equipment and pompong.	Collect and store all pesticide containers in the Hazardous Waste Temporary Store.
Used light bulbs	Offices, warehouses, schools, clinics, mosques and employee housing.	Collect and store all used containers of used bulbs in the Hazardous Waste Temporary Store.
Used cloth rags and used gloves	Pesticide Repair and Storage.	Collect and store all used rags and used gloves in the Hazardous Waste Temporary Store.
Used fertilizer sacks	Fertilizer warehouse	Collect and store Used fertilizer sacks in the Hazardous Waste Temporary Store.
Droplets of diesel and gasoline	Fuel oil storage, generator set, machinery and heavy equipment.	Make oil traps in waste warehouses, fuel warehouses, and all generator houses and avoid leakage in oil hoses and vehicle engines.

At the time of the field visit the company had implemented it related to waste management. For waste that is classified as Toxic and Hazardous Material (B3) is temporarily accommodated in Hazardous Waste Temporary Store. Mandah Estate and Hazardous Waste Temporary Store in Mandah Palm Oil Mill, then it is handed over to the party transporting and utilizing / destroying toxic and hazardous waste. This is evidenced by PT BNS

7.3.2

The company shows work instructions / SOP regarding toxic and hazardous waste management in the document:

1. SOP for Hazardous Waste Management (SPO / P & C / PLB3) was approved by Mill and Estate Manager on May 27, 2013. The procedure describes the type of waste according to its source including toxic and hazardous waste from non-specific, specific sources, from expired chemicals, spills, used packaging, and product discharges that do not meet specifications. In addition, toxic and hazardous waste handling flows such as sending toxic and hazardous waste to toxic and hazardous waste storage areas equipped with Secondhand Goods Delivery Note (*NPBB*), after toxic and hazardous waste is received by warehouse officials and handling toxic and hazardous waste according to the type of waste and recording incoming waste.
2. Work instructions for handling toxic and hazardous waste according to the type of waste produced in the appendix to the SOP for toxic and hazardous waste Handling (SPO / P & C / PLB3), including:
 - Work Instruction of Handling of Pesticide Packaging
The pesticide packaging is sent to the washing place, rinse the package clean (minimum 3x rinse), the used washing water is flowed into the container and used again for spraying, send the packaging waste to the licensed Hazardous Waste Temporary Store, then process / dispose / destroy the used pesticide packaging according to regulations .
 - Work Instruction of toxic and hazardous waste Waste Management (Solid and Liquid)
Collect waste in containers that have been given identification, symbols and labels, send and store to Hazardous Waste Temporary Store with a validity period of 90 days, if more than 90 days ask permission to extend waste to

the relevant agencies, then sell it to the agency / party collecting toxic and hazardous waste with permission. with a Secondhand Goods Delivery Note and Manifest.

- IK Clinical Waste Management

Collect waste in containers that have been given identification, symbols and labels, then send and save to Hazardous Waste Temporary Store with permission, destroy toxic and hazardous waste solid clinical waste by burning in incinerator to manager / hospital.

The company shows the toxic and hazardous waste manifest recording the date of transport (shipping date) January 22, 2019 to PT Global Marindo Perkasa transporter with the Ship Name BIL-8 vehicle number BP 9186 DU with details: PT. BNS Estate:

- Former manifest oil Number KLH-17633000000201UF 2.741 Tons.
- Used oil filter No. KLH-17633000000208UF is 0.0098 tons.
- Form of Accu manifest KLH-17633000000206UF number of 0.2084 Tons.
- The used packaging for toxic and hazardous waste manifest No. KLH-17633000000203UF is 5.282 tons
- Lab Waste manifest Number KLH-17633000000204UF amounting to 0.1007 Tons.
- The used lamp manifest number KLH-17633000000205UF is 0.008 tons.
- Toxic and hazardous waste contaminated waste manifest number KLH-17633000000205UF is 0.301 Ton

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 & 7.4.2

The company has an SOP related to fertilizing activities contained in the Agricultural Reference Manual (ARM) No. Policy 110 / EST-ARM / 13 Section 8 regarding Fertilization of Palm Oil Plants which includes: technical fertilization, application of empty bunch and compost applications on immature plants (TBM) and mature plants (TM), placement of fertilizers and fertilizer applications.

In order to maintain the number of plants and achieve production, the company carries out maintenance activities such as organic and inorganic fertilizing activities, manufacture of drainage ditches for water management, and soil and leaf analysis. Based on the results of field visits related to fertilizer application, it is known that fertilizer application has been carried out properly, placed between the trees, applied to all oil palm trees and no fertilizer fell into the water flow or employee emplacement.

The company shows a leaf analysis record by the MRC Team (Minamas Research Center) for each unit in 2019 where the Monitored Indicators are N, P, K, Mg, Ca, N, B, Fe, Cu and Zn contents.

For soil analysis, the company shows the Semi Detailed Land Survey and Land Suitability for Oil Palm Plants in the 2018-2023 period, which was made on May 17, 2018. Based on the assessment results of PT BNS's soil analysis, it was concluded that the nutrient content, especially base cations, was less balanced. The Na and Ca nutrient elements are generally low in idols 0 - 30 cm and 30 -60 cm, the low nutrient levels are due to the low cation exchange capacity, while the K and Mg nutrients are classified as high. Thus, soil fertility status in PT BNS can be said to be.

7.4.3 & 7.4.4

The certificate holders also displayed some records of the fertilization realization of PT Bhumireksa Nusasejati for the 2019 period:

- Fertilization realization in Division I RSE in June 2019: MOP 47,548 kg; HGFB 9,789 kg.
- Fertilization realization in Division II RSE in April 2019: NPK 64,884 kg.
- Fertilization realization in Division III RSE in May 2019: NPK 95,947 kg.
- Fertilization realization in Division V RSE in June 2019: MOP 5,520 kg.

Fertilization realization shown by the company is in accordance with fertilizer recommendations that were previously set by the MRC team.

All areas of PT. BNS is peatland (rich in organic content). EFB applications and liquid waste applications are not applied to the land. The company carries out a recycling strategy for other uses, such as:

- Fiber is used as boiler fuel
- Boiler ash is used for hardening roads.
- The shell is used as boiler fuel.

Status: Comply

7.5

Practices minimize and control erosion and degradation of soils.

7.5.1

In 2018 PT BNS conducted a Semi-Detailed Soil Survey which was carried out in collaboration with SDN's Agricultural Agricultural Soil Surveys (M), BHD. Based on the report, in the PT BNS area there are 2 types of Land Series, namely *Typic Haplochemist* as much as 94.4%, and *Typic Sulfihemist* area of 5.6%.

In 2011, PT BNS re-measured the depth of peat in its work area using a systematic method with the size of the distance between observation points is 500 m x 1,000 m. Marginal land status is clearly mapped on peatland maps for each estate. The information presented is the extent of peat depth distribution, the extent of peat maturity level distribution, sampling point location, mill location, emplacement location for each estate and the entire PT BNS estate. The report is completed with a Map of Peat Depth with a scale of 1: 48,000, the map has described the location of peatland >3 meters deep and land that has a depth of <3 m for each estate.

7.5.2 & 7.5.3

Based on the results of the field visit and document verification, it shows that the entire work area of PT BNS is peatland and is managed with the implementation of Peatland Water Management.

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; 7.6.2 & 7.6.3

Based on areal statement document, observation and interview with stakeholders, there's no new planting on company operational area after 2010.

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

Based on areal statement document, observation and interview with stakeholders, there's no new planting on company operational area after 2010.

The company has inventory and reported the existing peatlands in its operational area to RSPO on November 14, 2019 via email. In the email, the company informs several things according to RSPO guidelines, such as:

- Map with a scale of 1: 50,000 for the PT Bhumireksa Nusasejati planting area.
- Map with wind direction information, data sources, projections and issue dates.
- Details of statement areas on peat areas based on RSPO Peat Inventory Template guidelines for all simedarby group operational areas.

7.7.3

The company has procedures or work instructions for planting on peatlands in the technical SOP for planting on peatlands contained in Section 4, Section 5, Section 8 and Section 10 of the Agronomy Reference Manual No. Policy: 110 / EST-ARM / 13. However, in the procedure there are no guidelines for the installation / placement of subsidence pole as a measure of peatland subsidence that refers to the guidelines "RSPO Peatland Working Group meeting on 13-14 September 2018 to clarify potential audit guidance for Criteria 7.7 (as adopted by GA)" Which, companies must have 1

subsidence stake in every 240 ha of peat area. For peat areas with more than 5000 ha, the number of stakes can be reduced from these requirements if the company has justification.

From the results of field observations and document reviews, only 2 subsidence stakes were found at Mandah Estate and 2 subsidence stakes at Rotan Semelur Estate. The management also explained, that currently the company does not have procedures related to the peat subsidence stake.

Based on that objective evidences, monitoring procedures for peat subsidence have not yet fully complied with RSPO guidelines. **NCR No.2020.02**

7.7.4

The company shows the following documents related to the regulation of groundwater levels to inhibit carbon emissions from peatlands as follows:

1. Monitoring upper and lower zone water level inlet and outlet zones.
The types of water management activities carried out by the company include:
 - Construction of water canals to regulate water availability and transportation facilities. PT. BNS does not have an inlet channel connected to the river. Thus, the availability of pure water is supplied from rainfall. While excess water is discharged through the sluice (outlet) in the Teluk Bakau Estate.
 - Making and installing a piezometer. The piezometer is monitored by designated officers in each division / estate regularly every day. Water level is maintained between 50 - 70 cm below the surface of the land.
 - Construction of dams and floodgates.
 - Maintenance and mechanical washing of trenches. Performed routinely once a year using heavy equipment (excavators). Specifically, for aquatic plants that interfere with the course of transportation, the company has a manual canal maintenance team that works every day to care for canals to facilitate transportation.

2. Monitoring subsidence

The company has recorded peatland subsidence in the Peat Subsidence Data document for the period 2019 with the following documents:

Mandah Estate		
Field	Jan- July 2019	July- Dec 2019
G019	0.3 cm	0.4 cm
G021	0.4 cm	0.6 cm
Rotan Semelur Estate		
D030	0.1 cm	0.1 cm
D033	0.1 cm	0.1 cm

Based on field visits on subsidence pole, Block G21 Division II MDE, it is known that the company has taken measurements using subsidence stakes. Stakes have been restricted by using fences and are not treated with the aim of decreasing peat soils naturally occurring / no disturbance. At the time of the visit, land subsidence from the initial installation limit was around 8 cm (installation was carried out in May 2015).

7.7.5

The company conducted a drain ability study on PT Bhumireksa Nusasejati's peatlands in November 2017. However, the peatland drainage study did not fully refer to the RSPO guidelines in the Drainability Assessment Procedure for Replanting of Existing Palm Oil on Peatlands November 2019. Where the guidelines instruct, among others:

- Determine the number of years before the land will subside to the drainage base (assuming constant subsidence rate).
- If the time before the site subsides to the drainage base is ≥ 40 years, the area may be replanted whereas if it is < 40 years replanting is not allowed.

From the results of the document review, the company still has replanting activities for the next 5 years.

Based on that objective evidences, the peat drainability study has not fully referred to the RSPO guidelines. **NC**

No.2020.03
7.7.6

Based on field observations in the area of peatland PT BNS, following the best farming practices peat areas the company has done:

- The company already has stakes monitoring water levels in each channel, such as the collection drain, drain and the main drain field.
- The company has demonstrated record of water level monitoring in each peg that had been installed.
- The company has one door (water gate) connected to Kateman River, and known to have stakes in water level monitoring.
- There is a Fire Danger Rating System in several places (Mandah Estate Offices, Mandah Factory, etc.) in PT BNS that inform potential fire hazards in the area of peatland. Currently on standby.
- PT BNS has had an emergency response structure. For the structure of the fire department in TBE consists of 1 coordinator, 5 support, 5 deputy coordinator, 5 support & equipment section, 3 medical section, 3 consumption section, 3 communication & security section, 4 transport section and mechanics, 8 team 1, 8 team 2 and 8 team 3. Fire extinguisher simulation results show that the emergency response team and equipment can function properly.
- Emergency response procedures include:
 - SOP Prevention and Fire Fighting.
 - land fire emergency response procedures.
 - emergency response procedures earthquake.
 - Emergency Response Procedures Fuel Spill
 - Natural Disaster Emergency Response Procedures - Flood.

7.7.7

Based on the document area statement owned by the company, the data informs all peat areas in PT Bhumireksa Nusasejati planted with oil palm, with the remainder being housing facilities, employee offices and HCV areas. From the results of the document review, field observations, the company also did not create new drainage channels, roads and electricity lines in the HCV area or the oil palm planting area.

7.7.3	Status:	
7.7.5	Non-Conformance in Critical Category No.2020.02	
	Non-Conformance in Critical Category No.2020.03	

7.8
Practices maintain the quality and availability of surface and groundwater
7.8.1

The company has SOP No. 724 / TQEM-SPMS / 09 concerning Guidelines for Sustainable Plantation Management which includes protection of river borders (large rivers: 100 m and small rivers 50 m) and SOP No. 01 / BNS / III / 09 dated 25/03/2009 concerning Water Management. The SOP document contains guidelines for managing Spillway, Dams, measuring water levels in all types of canals, floodgate management, rainfall, and conservation.

The company has water management and water source maintenance documents listed in the RKL / RPL and UKL / UPL implementation reports for semester II of 2019, including:

- Minimize peat subsidence.
- Prevents irreversible drying.
- Availability of water for employees or domestic needs.
- Testing the quality of river and canal water once every 6 months.

The socialization related to the ban has been carried out. For example, the socialization carried out on July 15, 2019 at the RSE which was followed by foreman 1 and foreman chemist, warehouse staff and spray team totaling 16 people, in which the socialization was explained regarding the prohibition of spraying plants with pesticides and also an explanation of the function and use of plants on the edge of the canal. The company also has a memorandum of prohibition on chemical spray on the canal edge (number: Memo / SM-MDE / 32 / VI / 2019 dated June 13, 2019) which was signed by Sr. Mandah Estate Manager and socialization has been carried out to employees, for example in the Minutes of Socialization on September 7, 2019 which was attended by 10 spray employees and Mandah Estate staff.

7.8.2

The water management plan and its realization are presented in the environmental management and monitoring report (RKL / RPL semester II of 2019, for example:

- Identification and monitoring of the occurrence of erosion on the lip of the canal, the action that we do is to make stakes made of PVC pipes with scaled water level on the width of the channel marked with Stakes A and Stakes B which is the size of the channel width and for monitoring the occurrence of erosion is the distance from Patok A & Patok B to the embankment.
- Greening or planting species of tarutum and bamboo trees for strengthening canal embankments
- Efficient use of water for palm oil processing in the mill.
- Monitoring water levels in transportation channels and waterways reaching heights of 50-70 cm, through water gate control.

The socialization related to the ban has been carried out. For example, the socialization carried out on July 15, 2019 at the RSE which was followed by foreman 1 and foreman chemist, warehouse staff and spray team totaling 16 people, in which the socialization was explained regarding the prohibition of spraying plants with pesticides and also an explanation of the function and use of plants on the edge of the canal. The company also has a memorandum of prohibition on chemical spray on the canal edge (number: Memo / SM-MDE / 32 / VI / 2019 dated June 13, 2019) which was signed by Sr. Mandah Estate Manager and socialization has been carried out to employees, for example in the Minutes of Socialization on September 7, 2019 which was attended by 10 spray employees and Mandah Estate staff.

7.8.3

The company has a permit to dispose of wastewater to a water source in accordance with the permission of the Regent of Indragiri Hilir with number 503 / DPMPTSP-IPAL / 2 dated 15 March 2018. With the coordinates of LU: 00°06'49.0 "and BT 103°09'23.9" and submit reports every 3 months once to the Department of Environment & Cleanliness Indragiri Hilir Regency. As well as the quality standards used refer to appendix III PermenLH RI No.5 of 2014 concerning waste water quality standards. Permit for disposal of wastewater to water bodies of PT. BNS is valid for 5 (five) years from the date the permit was issued.

Testing of liquid waste is carried out by the Laboratory every month during 2019. The following results of the testing of the liquid waste in the period July - December 2019:

Treated Effluent (Mandah Factory)

Parameter	Unit/	Result						Threshold Limit Value
		July	Aug	Sept	Oct	Nov	Des	
BOD 5 days 20°C	mg/l	43.04	64.02	39.92	55.75	48.77	39.33	100
COD	mg/l	122.96	182.91	144.06	159.29	139.34	106.29	350
pH	-	8.95	8.71	8.13	8.74	8.52	8.63	6-9
Total suspended solid	mg/l	26	54	88	77	83	123	250
Oil & grease	mg/l	5	9	2	1	2	24	25
Nitrogen Total	mg/l	3.92	1.79	2.18	15.98	15.91	9.74	50

Threshold limit value refer to PermenLH No.5 tahun 2014 lampiran III.

Based on the explanation above, it is known that the parameters of liquid waste for the period July-December 2019 did not exceed the quality standards set by PermenLH No.5 of 2014.

The company has also reported the results of testing the quality of liquid waste every three (3) months to the Environmental Service Office of Indragiri Hilir Regency, the company shows the receipt of the Quarterly Report IV (October-December 2018) Mandah Factory liquid waste on February 5, 2020 (Mo 018 / BNS / MDF / II / 2020 to the Environmental and Sanitation Office of Indragiri Hilir Regency.

7.8.4

The company shows the efficiency of water use for processing in the Mandah Palm Oil Mill for the period January - December 2019 with the details that: Average FFB Olah of 7,432.70 tons; water use of 6,991 m³; efficient use of water for the process of 0.94 m³ / ton TBS with a budget of 1.10 m³ / ton TBS.

The company has a surface water extraction permit number 503 / DPMPTSP-SIPAP / 03 dated March 29, 2018 by the One-Stop Integrated Investment & Services Office for 2 years. Channel Width 4 M and Length 4000 M; MA 0.70 meters minimum 0.50 meters; total area of 250,000 m²; intake depth of 5 m; 360 m³ / day of surface water use with a production duration of 15 hours / day with a suction capacity of 33 liters / second.

The company shows proof of payment of surface water tax on February 21, 2020 for the January 2020 period of Rp 1,594,207. (15,942 m³) to the Riau Province Regional Revenue Agency.

The company has sent a request for an extension of the surface water extraction permit to the Investment and One Stop Integrated Services Office (PTSP) of Indragiri Hilir Regency. (Receipt of the letter dated March 12, 2020).

The company ensures that the extension of surface water extraction permit number 503 / DPMPTSP-SIPAP / 03 dated March 29, 2018 will expire. **(OFI)**.

Status: Comply

7.9

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

7.9.1

The company shows the efficient use of fiber fuels and shells for the 2019 period (Jan - Dec) Mandah Palm Oil Mill it is known that CPO production (tons) amounted to 19,433 tons; eggshell and fiber production of 15,732.54 tons; fiber and shells used were 8.093 tons; 864 liters of diesel use; the average efficiency of solar usage is 0.42 diesel / ton CPO.

The following is the recording of the utilization of shell, fiber and EFB from January to December 2019 Mandah POM:

Monitoring of FFB process, Shell and Fiber and EFB Mandah POM in 2019

Bulan	FFB Process (Ton)	Shell Production (Ton)	Fibre Production (Ton)	Empty Fruit Bunch (Ton)
Jan-19	8.280.832	414.042	1,076.508	1,821.783
Feb-19	6.625.171	331.259	861.272	1,457.538
Mar-19	6.931.454	346.573	901.089	1,524.920
Apr-19	7.485.114	374.256	973.065	1,646.725
May-19	7.321.073	366.054	951.739	1,610.636
Jun-19	7.111.869	355.593	924.543	1,564.611
Jul-19	9.024.262	451.213	1,173.154	1,985.338
Aug-19	7.659.150	382.957	995.689	1,685.013
Sep-19	6.438.595	321.930	837.017	1,416.491
Oct-19	7.162.289	358.114	931.098	1,575.704

Nov-19	6.377.681	318.884	829.098	1,403.090
Dec-19	6.787.937	339.397	882.432	1.493.346

Shells and fibers are used again as boiler fuel. For EFB produced it is not applied to the land, this is because based on the results of the semi-detailed soil survey in 2018-2023 it is known that the entire area of PT Bhumireksa Nusasejati is peat. For EFB burned using an incenerator.

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 minimize GHG emissions.

7.10.1; 7.10.2 & 7.10.3.

The company shows the recording of GHG using Palm GHG Version 4.0.1 PT BNS – Mandah Mill period 2019 as follows: Summary of Net GHG Emissions.

Emissions per Product	tCO ₂ e/product
CPO	25.68
PK	25.68

Production	t/yr
FFB processed	19432.76
CPO Produced	4406.23

Extraction	%
OER	22.24
KER	5.04

Land use	Ha
OP Planted on mineral	0
OP planted on peat	18629.70
Total oil palm planted area	18629.70
Conservation (forested)	715.35
Conservation (Non-forested)	0

Summary of field emissions and sinks

	Own Crop			Group		3 rd Party	
Emissions	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e/t FFB	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e	tCO ₂ e/ha
Land conversion	81373.54	9.88	0.95	2181.71	0.21	1.26	0
*CO ₂ Emissions fertilizer	7930.25	0.96	0.09	141.58	0.01	0.08	0
**N ₂ O Emissions from peat	61675.18	7.49	0.72	1497.25	0.14	0.86	0
**N ₂ O Emissions from fertilizer	5829.85	0.71	0.07	106.72	0.01	0.06	
Fuel Consumption	2585.67	0.31	0.03	74.16	0.01	0.04	0

Peat Oxidation	412120	50.02	4.81	121397.43	11.68	69.90	0
Sinks							
Crop sequestration	-77131.32	-9.36	-0.90	-1828.90	-0.18	-1.05	0
Conservation Sequestration	-6473.29	-0.79	-0.08	-3.55	0	0	0
Total	487909.89	59.22	5.70	123566.39	11.89	71.15	0

Summary of Mill Emissions and Credits

	tCO₂e	tCO₂e/tFFB
Emissions		
POME	0	0
Fuel consumption	662.37	0.01
Grid electricity	0	0
Utilization		
Credits	0	0
Export of grid electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	662.37	0.01

Palm oil Mill Effluent (POME) Treatment

Divert to compost	0 %
Divert to anaerobic digestion	100 %

POME Diverted to Anaerobic Digestion

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

Based on above explanation, Land conversion emissions for own crop is 9.88 tCO₂e/ha or 0.95 tCO₂e/t FFB, for group plantation is 0.21 tCO₂e/ha.

Based on area statement and land clearing documents, it is known that there was no land clearing above 2014. Mandah Factory activities which caused pollutions were identified from processing stations such as Engine Room, Boiler, Incinerator, WWTP, etc. Among GHG identified from those stations are NO₂, SO₂, CO₂, NH₃, HF, CH₃ and H₂S. Mill management has mentioned that company has carried out several strategies which aims for GHG mitigation purposes, i.e. periodic monitoring and maintenance, training for operators and operation of devices in accordance with technical guidelines. There was checking of PPE using before go to work. The company has given PPE to workers according with HIRAC identification.

The test results of air and noise dated August 15th, 2019 located in the Mandah Mill workspace (N 00°06'56.3 "and E 103°32'55.6") by an accredited laboratory number LP412 IDN, with details below:

Parameter	unit	The results	Threshold
Noise	dB(A)	83.50	85
Vibration	mm/second	2.22	40

Based on that, the parameter of noise and vibration didn't exceed the threshold by Decision of Environment Minister Number 48 year 1996 and 49 year 1996.

Status: Comply

7.11

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

7.11.1

Based on areal statement document, observation and interview with stakeholders, there's no new planting on company operational area after 2010.

7.11.2 & 7.11.3

PT BNS has had an emergency response structure. For the structure of the fire department consists of 1 coordinator, 5 support, 5 deputy coordinator, 5 support & equipment section, 3 medical section, 3 consumption section, 3 communication & security section, 4 transport section and mechanics, 8 team 1, 8 team 2 and 8 team 3. Fire extinguisher simulation results show that the emergency response team and equipment can function properly.

In addition, emergency response procedures include:

- SOP Prevention and Fire Fighting (RSPO / P & C / KDP).
- Firefighting emergency response procedures.
- Emergency response procedures earthquake.
- Emergency Response Procedures Fuel Spill
- Natural Disaster Emergency Response Procedures - Flood.

Some of the efforts carried out by the company in controlling fire include installing Fire Danger Index (FDI) in each plantation, providing fire towers, carrying out water management, monitoring from NOAA18 Satellites, installing fire alarm signs and prohibiting burning according to applicable regulations, providing fire extinguisher and firefighting equipment, formed a Fire Emergency Response Team, provided firefighting training to the Team and surrounding residents and formed a Fire Concern Community (*Masyarakat Peduli Api*) in the villages around the company.

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

There was planting on November 1, 2005 at the Rotan Semelur Estate in 2007. The planting area is outside the HCV area. The company's actual HCV area is the area occupied by the community and was in the form of a community garden at the time of the HCV survey.

The company has reported the disclosure of Mandah Factory Estate liability, PT BNS (progressive submission of land use change analysis results in accordance to the compensation procedures reported on 2 December 2014 addressed to RSPO Secretariat, Biodiversity and Conservation Manager (Ms. Oi Soo Chin). Submitted by Tang Men Kon (Head, PSQM Department, Sime Darby Plantation. Submission status in August 2015 (phase 2) for PT BNS (Rotan Semelur Estate) with a period of time:

- Time of clearance Nov 05 - Nov 07 (Ha) covering 135.15 Ha
- Time of clearance Dec 07 - Dec 09 (Ha) covering an area of 18.12 Ha

The company shows the PT BNS RaCP process with the following details:

- Liability and disclosure to RSPO on 2 December 2014.
- LUCA will be sent on 12 December 2017 and shapefiles submission to RSPO on 27 August 2018.

Rotan Semelur Estate

- Time of clearance Nov 05 - Nov 07 (Ha) covering 135.15 Ha.
- Time of clearance Dec 07 - Dec 09 (Ha) covering an area of 18.12 Ha.

- Concept notes were sent to RSPO on 25 March 2016 and responded to 5 December 2016.
- The RSPO Compensation panel on 12 November 2017 stated that the RaCP is still in Process.

7.12.2

The company has identified protected, rare, rare, or endangered species, and high conservation value habitats. The identification process is carried out by an HCV assessor registered with the RSPO under the auspices of the Indonesian Sustainable Palm Oil Foundation (YASBI). The identification process was carried out in October 2010, and at the time of the audit the HCV identification documents were made available by the company on October 16, 2010.

The assessment was carried out before the ALS requirements took effect because the assessment was carried out in 2009. The assessment was carried out by the Indonesian Sustainable Palm Oil Foundation (YASBI) with the team composition as follows:

1. Ir Purwo Susanto (Team Leader)
2. Dr. Kun Jaka Gurmaya in the biodiversity aspect of flora and fauna
3. Neny Indriyana, S.Hut, MT in the field of ecology
4. Lusiana Nogo Ladjar Msi. Biology field
5. Handy Rusdy S.Hut Mapping field.
6. Ir Hery Prasetyo in social and cultural fields.

The identification process showed that there were 125 species of flora 3 of which included protected, fauna recorded 55 species consisting of 6 species of mammals, 8 species of reptiles and 41 species. Rare species such as *Felis bengalensis* and *Felis viverrinus* are categorized in appendix I (CITES). Pangolin (*Manis javanicus*) is categorized in Rare according to IUCN.

Based on the identification of HCV areas, within the work area of PT BNS (MDE and RSE) there are only HCV Potential Areas which are in fact occupational land that is still controlled by the community, the land cover has been in the form of coconut plantations, fields and damaged peat forests. HCV potential area is as follows:

No	Estate	HCV 1	HCV 3	HCV 4	Total (Ha)
1	MDE	208.26	208.26	-	208.26
2	RSE	438.18	438.18	59.48	497.66

The preparation of HCV identification has used the 2008 High Conservation Value Areas Identification Guide.

Based on the results of field observations in the HCV Potential Area in the Mandah Estate and Rotan Semelur Estate, the HCV Potential Area is an occupation area controlled by the community so the company cannot manage optimally. At present the HCV area managed by the Company is 9.4 ha.

Based on areal statement document, observation and interview with stakeholders, there's no new planting on company operational area after 15 November 2018.

7.12.3

PT BNS has a land use trajectory document in the form of a table, which explains the type of land use / cover from before PT BNS's plantation activities took place and after the first planting activities in 1994 to 2014 and the use of the area for other company activities such as allotment of land for conservation areas, emplacement, canals and bridges, nursery areas, factories, occupational areas (in the form of villages and coconut plantations). From this table, it can be seen the changes in the area and type of land cover / use from before PT BNS's operations to the present (2014). And based on the RTRW map as stated in the AMDAL study, it is explained that the company is in another area of use, a cultivation area with peatlands.

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

7.12.4

From the results of the HCV Assessment, the concession area of PT. BNS according to the Land Use Title is 25,672 Ha plus a factory area of 9 Ha so that the total becomes 25,671 Ha.

The company shows plans and realization of the management of HCV potential areas in 2019. From the data / documents shown, the company has realized all 2019 program and management plans that have been determined.

This is also in accordance with the Procedures owned by the Company through the Conservation Forest Management SOP (Document Number PM 0500 dated April 1, 2012), the management procedure stated as follows:

1. Determine forest areas that meet HCV standards and designate these forests as conservation forests
2. Make a signboard as a sign that the forest is a protected conservation forest.
3. Making signboards prohibited from hunting wildlife, poisoning fish in conservation forest areas in the company environment.
4. Carry out preventive measures, in this case the socialization program to employees and contractors
5. Periodically monitor the area of the conservation forest and wild animals in the conservation forest area within the company.

For programs and management of HCV potential areas, the Company evaluates the results of the implementation of management activities every 6 months contained in the HCV Potential Area Management Evaluation Report and is reported to Riau Province Natural Resources Conservation Center.

Related to consultation with the surrounding community for the planned HCV area management program, the Company conducts consultations with the community through socialization activities carried out to the community. This is evidenced by the appointment of Minutes of HCV Area Socialization, for example Minutes of Socialization to the Community of Makmur Jaya Village on April 20, 2019 and October 12, 2019.

7.12.5

Based on areal statement document, observation and interview with stakeholders, there's no new planting on company operational area after 2010.

7.12.6

The results of the conservation area assessment in 2009 at PT BNS obtained inventory data in the form of 17 species of mammals, 13 species of birds and 4 types of reptiles and 71 types of flora. Flora and fauna monitoring are carried out routinely by supervisors and authorized by staff from the environmental department. PT BNS showed the results of monitoring the identification of flora and fauna in 2012 consisting of 6 mammals, 8 reptiles, 41 species of aves and 78 types of flora. The company also showed examples of conservation area monitoring documents on 15 July 2014, 9 September 2014 and 11 September 2014. Update of flora and fauna observation data on 11 September 2014 showed that there were fauna consisting of monkeys, root tigers, Hawk Bondol, Murai, Kacer, Kutilang, Ruak-ruak, Cembek Honey, Cucak, Cekakak Sungai, Sanca Snake, Mangrove Snake, Starling and Crow and flora consisting of Jelutung, Pulau.

Based on animal monitoring data for the period 2019, species found include *macaca fascicularis* (monkeys); *macaca nemastriana*, *Mycticebus coucang*, *Lutra lutra*, *Felis viverrinus*, *Heliastur indus*, *Sweet javanica*, *Ictinaetus malayensis*, *Copsycus saularis*, *Pycnonotus goiavier*, *Garule cinerea*, *Arachnothera sp.*. The observations of these animals and plants have been reported the existence of rare plants and animals Semester II of 2019 has been reported to the Riau Province Natural Resources Conservation Center on February 27, 2020.

The company also has a disciplinary policy - in the form of a memorandum from the Chairperson of SOU 20 to the Manager of Rotan Semelur Estate, Manager of Mandah Factory and all senior assistants, assistants, SOU 20 No. Section 3- / SOU20 / XII / 2015 dated 20 December 2015 concerning the prohibition of hunting, stun fish, killing, harming and maintaining or collecting protected flora and fauna by referring to:

- UU no. 32 of 1999 concerning environmental protection and management
- UU no. 42 of 1999 concerning forestry

In the form of sanctions:

- Letter of reprimand (given after verbal warning is not heeded)
- Warning letter (consisting of Warning Letter I, II and III, each valid for no later than 6 years after the date of issue)
- Termination of employment (increase in sanctions for violations of Warning Letter III which are the same type / severity of violation and / or more severe)

7.12.7

The company shows the plan and realization of the program and management of potential High Conservation Value areas for the 2019 period. The planned programs in 2019 include the following:

- Observation of Flora and Fauna.
- HCV area patrol
- Inspection and Installation of Signboard in HCV potential areas
- Socialization of HCV areas to the community and employees in HCV potential areas.
- Evaluation of HCV potential area management programs
- Flora and Fauna report

Of all the plans, based on the evidence presented, the Company has realized all programs and management of HCV potential areas in 2019.

The company has evaluated the results of the activities contained in the report every 6 months. From the HCV Area Management Evaluation report for the second semester of 2019 (July-December 2019), the Company has conducted an evaluation and follow-up actions to be taken regarding the problem, for example the existence of a problematic HCV potential area (in the Occupation of the community) besides continuing to monitor Periodically (3-4 months) the focus of activities is the implementation of CSR programs (improvement of the Dendan River) to support the smooth flow of public transportation and transportation of coconut plantation production which directly has a positive impact on the growth of the economy of the surrounding community.

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 BNS 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 2020.04.**

7.12.8	Status: Non conformity No 2020.04 with critical category.
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3.2 Conformity Checklist of Certificate and Trademark Use.

1.	Evidence of permission or approval certificate and trademark from Certification Body which submitted by Client	X or√
ASA-1.1	PT BNS (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: https://www.rspo.org/trademark/current-licensees .	√
	Status: Comply	
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 BNS (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: https://www.rspo.org/trademark/current-licensees .	√
	Status: Comply	
3.	Implementation of Certificate and Trademark is not used on product	X or√
ASA-1.1	PT BNS (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: https://www.rspo.org/trademark/current-licensees .	√
	Status: Comply	
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.	X or√
ASA-1.1	PT BNS (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: https://www.rspo.org/trademark/current-licensees .	√
	Status: Comply	

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>Company Group/Holding Statement: 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>Auditor Verification: 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"> - PT Budidaya Agro Lestari : 2 April 2018 - PT Guthrie Pecconina Indonesia – Sungai Jernih Estate : 8 Aug. 2018 <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"> • Primary forest. 	<p>Company Group/Holding Statement: HCV assessment has been conducted for uncertified units i.e. PT Mitra Austral Sejahtera (by Aksenta in March 2009) and Sime Darby</p>

	<ul style="list-style-type: none"> Any area identified as containing High Conservation Values (HCVs). Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3. 	<p>Plantation Liberia operations (by RSPO approved assessors – Dr SK Yap in 2011).</p> <p>Auditor Verification: Sime Darby Plantation Bhd sent disclosure of liability including LUCA analysis to RSPO Secretariat on 2 December 2014 and 2nd 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 st 2010 must comply with the RSPO New Plantings Procedure.	<p>Company Group/Holding Statement: A new mill will be set up in Liberia and planned for commissioning in February 2016. Preparation to undergo the RSPO Certification process is in progress and SDP targets to undergo RSPO Certification by end 2017. RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps is in progress. *Note: RSPO NPP Announcements for SDP can be found at http://www.rspo.org/certification/new-planting-procedures/public-consultations/page/14</p> <p>Auditor Verification:</p> <ul style="list-style-type: none"> Karya Palma Estate (PT Sandika Natapalma) and Baturus Estate (PT Budidaya Agro Lestari) any new planting after January 1st 2010 and due to not conduct NPP. <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>Company Group/Holding Statement: Sime Darby (Liberia) Plantation Inc. Status: Box G - Close for Monitoring Further details please refer to: http://www.rspo.org/members/complaints/status-of-complaints/view/46</p> <p>Auditor Verification: 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"> • PT Sime Indo Agro 1,652 Ha • PT Aneka Inti Persada 421.31 Ha • PT Bina Sains Cemerlang 308.25 Ha • PT Bersama Sejahtera Sakti 765 Ha • PT Langgeng Muaramakmur 1,162 Ha • PT Paripurna Swakarsa 1,120 Ha • PT Swadaya Andika 63 Ha • PT Bahari Gembira Ria 1,639 Ha • PT Guthrie Pecconina Indonesia 4,133 Ha • PT Perkasa Subur Sakti 1,286 Ha

3.4 Identification of Findings, Corrective Action, Observations, Opportunity for Improvement and Noteworthy Positive Components.
3.4.1 Identification of Findings, Corrective Actions and Observations at Re-Certification

NCR No.	: 2019.01	Issued by	: Trismadi N			
Date Issued	: 15 March 2019	Time Limit	: ASA-1.1			
NC Grade	: minor	Date of Closing	: 15 March 2020			
Standard Ref. & Requirement	: 1.1.1. List of information related to criterion 1.2 that can be accessed by relevant stakeholders shall be available.					
Evidence observed (filled by auditor): 1. Based on the results of document verification and interview with the management it is known that PT BNS was established in 1990, previously a subsidiary of SAMBU Group. Then there were changes in ownership such as: the Salim Group in 1997; Kumpulan Guthrie Berhad in 2002, Minamas Gemilang in 2008, and Sime Darby Plantations in 2008. Record of land acquisition were not available again on the site. Therefore, based on interview with management and the surrounding communities in Teluk Bunian Village. There are planting compensations was carried out in the period of 2007 to 2009. However, the company has not been able to show a recapitulation of the previous land owners. 2. The company has not been able to show evidence of fire monitoring reports to the Plantation Agency as required in the Agriculture Minister Regulation Number 05 of 2018 article 31.						
Non-Conformance Description (dilengkapi oleh auditor): 1. The company has not been able to show recapitulation of previous land owners. 2. The company has not been able to show that all obligation reporting to the relevant agencies.						
Correction (filled by organization audited): <ul style="list-style-type: none"> Appointed SQM Staff as PIC to make annual mandatory reports on land fire monitoring and prevention and report them to the Plantation Office Report the submission of an annual mandatory report on land fire monitoring and prevention to the Plantation Agency. Showed the list of previous land owner document to auditors at audit assessment.						
Corrective Action (filled by organization audited): <ul style="list-style-type: none"> SQM staff will carry out monitoring submission of annual mandatory reports on land fire monitoring and prevention to the Plantation Office. Filing legality documents at the South Riau Area Controller office. 						
Assessor Evaluation and Conclusion (filled by auditor): Verification on Surveillance-1.1 Based on the results of verification during surveillance-1.1, the company has appointed SQM staff (on behalf of Linggar Eko) as the person responsible for the management recapitulation of compulsory reporting evidence to related agencies. For example, the mandatory documents that have been sent to the relevant agencies are as follows:						

- Hazardous Waste Report IV (October to December 2019) on February 5th, 2020.
- Land fire Prevention Report on March 12th, 2020.
- HGU Utilization Report on March 13th, 2020.

Based on surveillance-1.1 assessment, whole previous land compensation documents can be shown and maintained in the Legal Division office (Plantation Services Department in South Riau Area Controller office and in Jakarta Head Office).

Based on that explanation, the non-conformities have been closed with observation.

Correction *(filled by organization audited):*

- Appointed SQM Staff as PIC to make annual mandatory reports on land fire monitoring and prevention and report them to the Plantation Office
- Report the submission of an annual mandatory report on land fire monitoring and prevention to the Plantation Agency.

Showed the list of previous land owner document to auditors at audit assessment.

Verified by : **Briyogi Shadiwa**

NCR No.	: 2019.02	Issued by	: Haikal Ramadhan Kharismansyah
Date Issued	: 15 March 2019	Time Limit Batas Waktu	: Before certificate issued
NC Grade Grade ketidaksesuaian	: Major	Date of Closing Tanggal Terpenuhi	: 11 May 2019
Standard Ref. & Requirement Acuan Standar & Persyaratan	: 4.5.1 Monitoring of Integrated Pest Management (IPM) plan implementation shall be available.		
Evidence observed (filled by auditor): <ol style="list-style-type: none">1. Agronomy Reference Manual for Oil Palm Planting No. Politics: 110 / EST-ARM / 13 in 2013 section 15 concerning Plant Protection. Among them are explaining about oil palm plant pests, census methods and frequencies, controlling method (for example : Palm Leaf Eating Caterpillar – under normal conditions once a month; Rat every 3 months; Ganoderma twice a year on peat soil in immature)2. Census Recapitulation and Control of MDE Division 1 Oryctes for January and February 2019 Periods3. Census of Ganoderma MDE Division I - IV attacks in December 20184. Recap of RSE Pest and Disease for mature and immature October - December 2018; January 2019 (Blocks D033, D034, D032, E31, E32, E33, C34) - Oryctes; Tirathaba; Nettle Caterpillar5. Oryctes Census September - December 2018 and January 2019 RSE Division I (Blocks D33 and D34)6. RSE and MDE consist of 5 divisions			
Non-Conformance Description (dilengkapi oleh auditor): <ol style="list-style-type: none">1. Certificate Holder has not carried out a census of plant pests and diseases consistently according to what is stipulated in the Reference Minamas Plantation Agronomy Manual2. It has not been able to show enough evidence that the census of plant pests and diseases has been carried out thoroughly for all types of potential pests and diseases and has been carried out in all divisions.			
Root Cause Analysis (filled by organization audited):			

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

Correction (*filled by organization audited*):

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

Corrective Action (*filled by organization audited*):

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

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

Verification on April 5, 2019

The company shows proof of improvement in the form of

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

However, it has not shown:

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

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

Verification on May 11, 2019

Additional proof of improvement has been shown:

1. Census of MDE and RSE pests and diseases for the January and February 2019 periods
2. There is already information about the mouse census and ganoderma
3. Decree of Pest and Disease officer RSE and MDE

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

Verified by : **Haikal Ramadhan Kharismansyah**

NCR No.	: 2019.03	Issued by	: Haikal Ramadhan Kharismansyah
Date Issued	: 15 March 2019	Time Limit	: Before certificate issued
NC Grade	: Major	Date of Closing	: 11 May 2019
Standard Ref. & Requirement	4.6.2 Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications) shall be available.		

Evidence observed (filled by auditor):

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

Non-Conformance Description (dilengkapi oleh auditor):

Recording of the use of pesticides indicated by the Certificate Holder has not fully informed all types of pesticides used. For example the use of Achepate on MDE and Cypermethrin at RSE.

Root Cause Analysis (filled by organization audited):

There is use of pesticides that are not confined to warehouse reports because data on pesticide use especially for pest control have not been included in the agronomic report every month so that they have not been monitored and evaluated.

Correction (filled by organization audited):

Make a recapitulation of the use of pesticides that are applied in the field and determine the PIC, namely agronomic admin so that it will be listed in the agronomic report every month.

Corrective Action (filled by organization audited):

List the use of pesticides in agronomic reports and conduct monthly evaluations of the use of pesticides.

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

The company shows proof of improvement in the form of:

1. Use of MDE pesticides for 2018 along with information on LD50, total usage, application area, and use of active ingredients / ha. There is information about using achepate
2. Use of RSE pesticides for the period 2018 along with information on LD50, total usage, application area, and use of active ingredients / ha. There is already information about the use of cypermethrin.

Evidence of the submitted repairs can be received, but more information is needed in the root cause analysis, correction, and corrective action. Nonconformities have not been fulfilled.

Verification on May 11, 2019

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

Verified by : **Haikal Ramadhan Kharismansyah**

NCR No.	: 2019.04	Issued by	: Haikal Ramadhan Kharismansyah
Date Issued	: 15 March 2019	Time Limit	: Before certificate issued
NC Grade	: Major	Date of Closing	: 11 May 2019

Standard Ref. & Requirement	4.6.3 Any use of pesticides shall be minimized as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in Indonesia Best Practice guidelines
<p>Evidence observed (filled by auditor):</p> <ol style="list-style-type: none"> Monitoring the use of Cypermethrin MDE for the period January - December 2018 totaling 6,553 liters Oryctes RSE monitoring board - Application of Cypermethrin for D33 blocks (plant age 31 months) C34 (plant life of 27 months); Census December 2018 and January 2019 D33 1.3% and C34 0.5% MRC Training and Socialization to Estate - Oryctes control threshold is if the new attack is $\geq 5\%$. Use of Cypermethrin period 1 March - 11 March 2019 according to the warehouse Stock Opname: <ul style="list-style-type: none"> RSE: 180 liters MDE: 273.40 liters Reference Agronomy Manual for Oil Palm Planting No. Politics: 110 / EST-ARM / 13 in 2013 section 15 concerning Plant Protection, among others, states that heavy infestations in immature oil palm plants need to be subjected to chemical treatment until the plants are 24 months old (once every two weeks). The results of interviews with MDE and RSE assistants stated that the reference for controlling Oryctes in Immature oil palm was ARM <p>Non-Conformance Description (dिलेङ्कपि लेह अडिटर):</p> <ol style="list-style-type: none"> The use of preventive pesticides to control Oryctes carried out by Certificate Holders is not yet equipped with identification of specific situations. Not yet able to show plans and realization of Oryctes control in an integrated management in accordance with the principle of IPM so that it can lead to minimal use of pesticides. 	
<p>Root Cause Analysis (filled by organization audited):</p> <ul style="list-style-type: none"> There are no special officers who handle integrated pest control There is no mapping for blocks that must be regularly controlled by pesticides 	
<p>Correction (filled by organization audited):</p> <ul style="list-style-type: none"> Oryctes pest control by cultivation techniques is carried out by making CECT and chipping when replanting. Re-mapping blocks that are still controlled by spray control Cypermethrin on blocks with border block status, census blocks above the threshold, and preventive blocks (<24 months old). 	
<p>Corrective Action (filled by organization audited):</p> <p>Periodically evaluate the results of integrated pest control monitoring and use of pesticides in pest control.</p>	
<p>Assessor Evaluation and Conclusion (filled by auditor):</p> <p>Verification on April 5, 2019</p> <p>The company shows proof of improvement in the form of:</p> <ol style="list-style-type: none"> Letter of RSE manager regarding Oryctes control Monitoring the census time of division I, II, and V RSE Memo of the RSE manager for horn beetle; control of horn beetles with preventive cypermethrin up to the age of 24 months. The Barrier Block is still controlled. <p>But it has not shown proof of improvement in the form of:</p> <ol style="list-style-type: none"> Horn beetle distribution map for MDE and RSE which informs preventive blocks (Application of pesticides up to 24 months), census blocks (Application of pesticides if there is an attack above the threshold of control), and barrier blocks (block-blocks directly adjacent to the area of attack horn beetle) <p>Thus the nonconformity is stated to have not been fulfilled. Additional proof of improvement is still needed</p>	

Verification on May 11, 2019

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

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

Verified by : **Haikal Ramdhan Kharismansyah**

NCR No.	: 2019.05	Issued by	: Mohamad Amarullah
Date Issued	: 15 March 2019	Time Limit	: Before certificate issued
NC Grade	: Major	Date of Closing	: 10 June 2019
Standard Ref. & Requirement	: 4.7.2. A documented risk assessment shall be available and its implementation shall be recorded.		
Evidence observed (filled by auditor): <ul style="list-style-type: none">• HIRAC is not covered all activities in Estate or Mill, for example, there is no HIRAC for boat movement among drainage zone by crane; diesel filling to tugboat.; canal maintenance; WTP chemicals transportation from storage area under loading ramp to WTP Station, etc.• Treceability of HIRAC evaluation is not available.• Risk category assessment (EPR) for HIRAC in Rotan Semelur Estate is not available.• Hazard analysis in Estate HIRAC for pesticide application did not mentioned risk of chemical exposure.• Based on observation to pesticide application activity in Block G027 Mandah Estate and Block D033 Rotan Semelur Estate, it was known that all applicators did not wear goggle and/or Face Shield as required in HIRAC and procedure No. 10x/PTK-PST/2004 Point 3.			
Non-Conformance Description (filled by auditor): Company management is not be able to shows that HIRAC has covers all activities in the estate and mill. Furthermore, information provided in HIRAC among units is different between units (not standard) and most likely not comprehensive.			
Root Cause Analysis (filled by organization audited): Currently, HIRAC control and distribution is not centralized managed by PAQM Department. Thus, any units has kept different version.			
Correction (filled by organization audited): <ul style="list-style-type: none">• To reinventor and identified all HIRAC for all units in PT BNS, which latter on to be evaluate and standardize, in accordance with HIRAC procedure.• To distribute latest HIRAC to all units in PT BNS.			
Corrective Action (filled by organization audited): Appointing ESH-PSQM Staff as PIC who responsible to monitor, evaluate, update and distribute latest HIRAC to the estates and mill unit.			
Assessor Evaluation and Conclusion (filled by auditor): Auditor Verification 29 May 2019 Unit management shows latest HIRAC for estate and mill No. 7301/PSQM-ESH/11 dated 14 May 2019 which consist of 21 and 19 operational activities on the estate and mill, respectively. HIRAC on boat movement among drainage zone by crane and diesel filling to tugboat is presented in HIRAC of “operational of tug bot”. Treceability and evaluation of			

HIRAC is mentioned on the latest HIRAC. Furthermore, HIRAC of Pesticide Application has mentioned risk on chemical exposure, as well as its mitigation. However, several correction evidence are not available, as follows:

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

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

Auditor Verification 10 June 2019

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

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

Verified by	: Mohamad Amarullah
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NCR No.	:	2019.06	Issued by	:	Mohamad Amarullah
Date Issued	:	15 March 2019	Time Limit	:	ASA-1.1
NC Grade	:	Minor	Date of Closing	:	13 May 2019
Standard Ref. & Requirement	:	4.7.6 All workers shall be provided with medical care, and covered by accident insurance (see criterion 6.5.3).			
Evidence observed (filled by auditor): Based on review towards agreement with replanting contractor PT Mitra Karya Jaya Perdana No. 012/Replanting/BNS/2018 dated 29 June 2018, it was stated in Article 9 that manpower insurance for contractor workers shall be covered by contractor. However, evidence of registration and payment is not available					
Non-Conformance Description (filled by auditor): company management do not have mechanism to ensure that all contractor workers are covered by accident insurance.					
Root Cause Analysis (filled by organization audited): The company has no system which able to monitor BPJS Manpower payment of contractor workers by the respective contractor.					
Correction (filled by organization audited): <ul style="list-style-type: none">- To create system that able to monitor BPJS-Manpower payment of contractor workers which will be carried out during invoice payment to contractor.- To shows evidence such as BPJS Manpower Membership Certificate, as well as its monthly BPJS Manpower payment evidence					

Corrective Action (filled by organization audited):

To conduct monitoring on BPJS Manpower Membership of Contractor Workers, every payment invoice date.

Assessor Evaluation and Conclusion (filled by auditor):
Auditor Verification 13 May 2019

Descriptions towards root cause analysis and corrective action are acceptable. Furthermore, several evidence shows by company management is presented as follows:

- Letter of PT Mitra karya Jaya Perdana (MKJP) Director as replanting contractor to Area Controller of Riau Selatan Region No. 077.MKJP/PKU/IV/2019 dated 13 April 2019 about confirmation towards supporting data of PT MKJP has stated that their workers has been registered on BPJS Manpower. Furthermore, evidence of ongoing registration process for new employee, evidence of BPJS Manpower payment and details of employees wages were describes properly.
- Details of BPJS Manpower Payment which presented in Form 2a PU BPJS dated 10 February 2019, 10 March 2019 and 10 April 2019 which informd that 4 workers of PT MKJP has already registered and their BPJS manpower has been paid periodically every month.
- PT MKJP for BPJS Manpower Memrbership Certificate No. No. 1200000020841 which issued by BPJS Manpower Director on 12 April 2019 which stated that PT MKJP had been registered as BPJS Manpower member as in accordance with Act No. 24 in 2011 and has also registered on retired insurance since November 2015.

Based on root of cause and corrective action review, as well as evidence of correction given, it could be concluded that NCR No. 2019.06 is considered **closed**.

Verified by : **Mohamad Amarullah**

NCR No.	:	2019.07	Issued by	:	Brigitta Prita
Date Issued	:	15 Maret 2019	Time Limit	:	ASA-1.1
NC Grade	:	Minor	Date of Closing	:	18 March 2020
Standard Ref. & Requirement	:	5.3.3. A documented waste management plan to avoid or reduce pollution and its implementation shall be available			
Evidence observed (filled by auditor): Based on field observations are known: <ol style="list-style-type: none">1. There is (frond burning activities between coconut tree) Located in Division 4 Block I 026 MDE and around the Office of Division 3 & 4 RSE it is known that there is burning of domestic waste and weeds.2. The distance of landfill is located near the MDF Housing within less than 50 meters					
Non-Conformance Description (filled by auditor): Based on the explanation above it is known that: <ol style="list-style-type: none">1. Points (1) are not in accordance with the RSPO No 3.62 / Waste No waste management procedure dated January 1st, 2019 in point 5.1 which states that all waste produced by households must be disposed of in a landfill.2. Point (2) is not in accordance with government regulation No. 81 of 2012 that in article 23 it is stated that the distance of landfill from housing is more than 1 kilometer by considering leachate pollution, odor, spread of disease vectors and social aspects.					
Root Cause Analysis (filled by organization audited):					

Burning coconut frond between oil palm carried out by the community because they do not understand the rules about prohibit open burning. As well as workers working at the RSE Offices Division 3 & 4 do not know about the prohibition of burning garbage.

Correction *(filled by organization audited):*

- Installing a signboard prohibits burning forests in the estate area.
- Socialization to the community around estate area.
- Issued a memorandum related to waste management from the RSE Manager.
- Socialization of waste Management Memorandum.

Corrective Action *(filled by organization audited):*

- The PMU Department will routinely conduct internal assessments related the cleanliness of the environment around workers housing.

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

Verification, May 29th 2019.

The company shows evidence of improvement as follows:

1. Estate Manager Memorandum of RTE No RSE-Int / 177 / IV / 2019 / s dated April 15th, 2019, Regarding: Waste Management to all Assistant and Head of Staff, among others: prohibition of entering waste into RSE plantation areas, prohibition of importing garbage, the prohibition of mixing garbage with hazardous waste, the prohibition on managing waste that causes pollution, the prohibition of disposing of waste improperly, the prohibition of handling waste by open dumping at the place of final scraping and / or burning waste that is not in accordance with the technical requirements of waste management.
2. Socialization of the prohibition on burning garbage to Head of Sub-Village, security guards, and the community around Mandah Estate on May 18th, 2019 attended by 13 people.
3. Socialization of waste management at the RSE Division 3 & 4 Hospital in March 19th, 2019, especially the ban on burning garbage, followed by 24 workers.

Verification, March 18 2020

The company shows evidence of improvement as follows:

1. Minutes of removal of the landfill in the Mandah Factory employee housing on March 18, 2020. The document explains that the closure of the Landfill located in the Mandah Factory employee housing. Henceforth, domestic waste originating from the factory employee housing is disposed of at the landfill in the Mandah Estate employee housing.
2. Minutes of the socialization of waste management procedures that were carried out on March 18, 2020, followed by Mandah Factory Employees. As for the things delivered, for example, as follows:
 - All domestic waste produced by households must be disposed of in a landfill
 - Distance of landfill with housing is at least 250 meters
 - Transporting domestic waste at least 2 times a week
 - Periodic inspections are carried out by Plantation Sustainability Quality Management (PSQM) team
3. The company shows the program and realization of domestic waste disposal for 2020.

During the visit to the Mandah factory employee housing, the location of the landfill had been carried out by hole closure and cleaning in the area.

Auditor conclusion:

Based on above explanations, this nonconformities has been closed.

Verified by	:	Trismadi N
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NCR No.	:	2019.08	Issued by	:	Mohamad Amarullah
Date Issued	:	15 March 2019	Time Limit	:	Before certificate issued
NC Grade	:	Major	Date of Closing	:	13 May 2019
Standard Ref. & Requirement	:	6.5.1 Documentation of pay and conditions for employees based on the existing manpower regulations shall be available.			
Evidence observed (filled by auditor): based on review towards work agreement with replanting contractor, for example with PT Mitra Karya Jaya Perdana which presented in Contract No. 012/Replanting/BNS/2018 dated 29 June 2018, it was known that article mentioning minimum wages payment for contractor workers is not available.					
Non-Conformance Description (filled by auditor): company management has no mechanism to ensure that all contractor workers are paid in accordance with applicable regulation.					
Root Cause Analysis (filled by organization audited): The company has no system of monitoring which aim to ensure salary payment of contractor workers is in accordance with applicable regulation.					
Correction (filled by organization audited): <ul style="list-style-type: none"> - To create system that able to monitor salary payment of f contractor workers which will be carried out during invoice payment to contractor. - To shows evidence that salary payment of contractor workers is in accordance with applicable regulation. 					
Corrective Action (filled by organization audited): <ul style="list-style-type: none"> - To conduct monitoring on salary payment of Contractor Workers, every payment invoice date. - Clause and point of applicable minimum wages regulation pursuance will be added on the next work agreement with contractor. 					
Assessor Evaluation and Conclusion (filled by auditor): Auditor Verification 13 May 2019 Descriptions towards root cause analysis and corrective action are acceptable. Furthermore, management unit is able to shows evidence of salary payment that presented in Form 2a PU BPJS Manpower dated 10 February, 10 March 2019 and 10 April 2019 which informed that all contractor workers salary registered are more that minimum wages of Indragiri Hilir Regency, or more that IDR 2,750,618.96 per month. Based on root of cause and corrective action review, as well as evidence of correction given, it could be concluded that NCR No. 2019.08 is considered closed .					
Verified by	:	Mohamad Amarullah			

NCR No.	:	2019.09	Issued by	:	Brigitta Prita
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<i>Date Issued</i>	: 15 Maret 2019	<i>Time Limit</i>	: ASA-1.1
<i>NC Grade</i>	: Major	<i>Date of Closing</i>	:
<i>Standard Ref. & Requirement</i>	7.3.1. There shall be evidence that no new plantings have replaced primary forest, or any area required to maintain or enhance one or more High Conservation Values (HCVs), since November 2005. New plantings shall be planned and managed to best ensure the HCVs identified are maintained and/or enhanced (see Criterion 5.2).		
Evidence observed (filled by auditor): The company shows RaCP of PT BNS process with the following details: <ul style="list-style-type: none"> • Liability and disclosure to RSPO on December 2nd, 2014. • LUCA was sent on December 12th, 2017 and shape files submission to RSPO on August 27th, 2018. Rotan Semelur Estate: <ul style="list-style-type: none"> - Time of clearance Nov 05 - Nov 07 (Ha) covering an area of 135.15 Ha. - Time of clearance Dec 07 - Dec 09 (Ha) covering an area of 18.12 Ha. • Concept notes was sent to RSPO on March 25th, 2016 and responded on December 5th, 2016. • RSPO Compensation panel dated November 12th, 2017, states that the RaCP is still in process. <p>Based on communication between PT Mutuagung Lestari and RSPO February 13th, 2019, information was obtained that "A preliminary review of the compensation plan has been done. However, no further action can be taken because the LUCA is still awaiting finalization and its pending clarification from Sime Darby ". In this regard, the company has not been able to show that the RaCP compensation plan has been approved by the RSPO.</p>			
Non-Conformance Description (filled by auditor): The company has not been able to show evidence that the RaCP compensation plan has been approved by the RSPO.			
Root Cause Analysis (filled by organization audited): The unit has not received information from Sime Darby regarding the progress of LUCA PT BNS.			
Correction (filled by organization audited): The time line check list of the LUCA Sime Darby submission checklist (attached file) has been submitted.			
Corrective Action (filled by organization audited): Continue to update to Sime Darby to communicate the progress of the LUCA PT BNS progress.			
Assessor Evaluation and Conclusion (filled by auditor): Verification, May 27th, 2019. The company has shown evidence of communication with the RSPO Secretariat on May 9 th , 2019 which informed that a meeting had been held with the RSPO on May 8 th , 2019, at the meeting agreed: "Considering the historical involvement and events (as presentation slides and documents attached), SDP is given a one year time extension period to address all outstanding matters (including the approval of compensation plan) related to non-conformity raised on 7.3.1 during the RSPO Re-certification/Annual Surveillance Audits for the affected units. (The timeframe of one year whether from May 2019 or maybe staggered according to the certification dates of each Unit of Certification will be advised by RSPO Secretariat Based on an email from RSPO (aminah.ang@rspo.org) dated May 23 rd , 2019, it is known that "The RSPO secretariat has been agreed to allow the NC to be raised on 7.3.1 to Sime Darby's open units until the next ASA" so that the non-			

conformity indicator 7.3 .1 stated has not been fulfilled.

Verified by : **Brigitta Prita**

NCR No.	2019.10	Issued by	Trismadi N
Date Issued	15 March 2019	Time Limit	Before certificate issued
NC Grade	Major	Date of Closing	1 April 2019
Standard Ref. & Requirement	5.5.2 Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following: a. The site has legal ownership of all input material to be included in outsourced processes; b. The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary. c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. d. The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance.		
Evidence observed (filled by auditor): Based on document verification sighted that all RSPO Certified products transport are using third parties, such as: PT Trans Samudera Mandiri, PT Sinar Pagoda Services, PT Transindo Bahari Perkasa, PT Mitsi Citra Mandiri, and PT Pelayaran KJ Marine. There were an agreement dated 7 May 2018 stating that PT Trans Samudera Mandiri & PT Mitsi Citra Mandiri were willing to be accessed by the Certification Body related to the implementation of RSPO standards.			
Non-Conformance Description (dilengkapi oleh auditor): The company has not been able to show evidences that all third parties who handling the RSPO Certified products are willing to be accessible by the RSPO Certification Body.			
Root Cause Analysis (filled by organization audited): The transport agreement has not been carried out according to the required clauses related to the certification body need access to the contractor.			
Correction (filled by organization audited): Showing all of agreement on CSPO & CSPK transportation that state the certification bodies can check directly into the transporter to verify the data.			
Corrective Action (filled by organization audited): Coordination with Legal department to be able added the clause in each new agreement between PT BNS and transporters.			
Assessor Evaluation and Conclusion (filled by auditor): Verification on 1 April 2019 The company was show several evidence as follows: 1. Agreement number 016/BNS-MDF/III/2019 dated 11 March 2019 with PT Pelayaran Sinar Pagoda for CPO			

& PK transportation. It was explained that the transporters were willing to be accessed/audit directly by the certification bodies.

2. Agreement number 017/BNS-MDF/III/2019 dated 11 March 2019 with PT Pelayaran KJfor CPO & PK transportation. It was explained that the transporters were willing to be accessed/audit directly by the certification bodies.
3. Agreement number 018/BNS-MDF/III/2019 dated 11 March 2019 with PT Transindo Bahari Perkasa for CPO & PK transportation. It was explained that the transporters were willing to be accessed/audit directly by the certification bodies.

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

Verified by : **Trismadi N**

NCR No.	2019.11	Issued by	Trismadi N
Date Issued	15 March 2019	Time Limit	Before certificate issued
NC Grade	Major	Date of Closing	1 April 2019
Standard Ref. & Requirement	5.7.2 The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform: <ul style="list-style-type: none"> • Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures. • Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually. • Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed. • Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements. 		

Evidence observed (filled by auditor):

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

Products	Shipping Announcement (MT)	Remove (MT)	Credit Allocations (MT)	Remaining Volume (MT)
CSP0	9,798.98		13,400	76.02
CSPK	2,734.82		0	2,325.18

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

Products	Claim RSPO (MT)	Conventional (MT)
CSP0	9,008.93	9,812.52
CSPK	617.33	3,366.56

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

Non-Conformance Description (dilengkapi oleh auditor):

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

Root Cause Analysis (filled by organization audited):

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

Correction (filled by organization audited):

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

Corrective Action (filled by organization audited):

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

Assessor Evaluation and Conclusion (filled by auditor):

Verification on 1 April 2019

The company shows several evidences as follows:

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

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

Verified by : Trismadi N

<i>NCR No.</i>	: 2019.12	<i>Issued by</i>	: Trismadi N	
<i>Date Issued</i>	: 15 March 2019	<i>Time Limit</i>	: Before certificate issued	
<i>NC Grade</i>	: Major	<i>Date of Closing</i>	: 1 April 2019	
<i>Standard Ref. & Requirement</i>	: 5.9.1 The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements			
<i>Evidence observed (filled by auditor):</i> The Mandah POM shows several records of transactions in the RSPO Palm Trace for the period of March 2018 until February 2019 as follows:				
Products	Shipping Announcement (MT)	Remove (MT)	Credit Allocations (MT)	Remaining Volume

				(MT)
CSPO	9,798.98		13,400	76.02
CSPK	2,734.82		0	2,325.18

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

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

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

Non-Conformance Description *(dilengkapi oleh auditor):*
Mandah POM has not been able to show evidence that it has maintained up to date data, both data in palm trace and actually in the MDF.

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

Correction *(filled by organization audited):*

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

Corrective Action *(filled by organization audited):*

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

Assessor Evaluation and Conclusion *(filled by auditor):*
Verification on 1 April 2019
The company shows several evidences as follows:

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

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

Verified by	:	Trismadi N
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3.4.2 Identification of Findings, Corrective Actions and Observations at 1.1 Assessment

NCR No.	:	2020.01	Issued by	:	Brigitta Prita
Date Issued	:	26 March 2020	Time Limit	:	Next Surveillance
NC Grade	:	Non-Critical	Date of Closing	:	
Standard Ref. & Requirement	:	2.2.2 All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.			
Evidence observed: <p>The company shows the CLA between the company (first party) and the Contractor (CV Heheng / second party) with number 007 / Barak / BNS-MDF / IV / 2018 dated April 23, 2018. In article 6 regarding the stages and manner of payment each copy of payment transfer is explained will be submitted to the second party and then the second party must immediately issue a receipt to be submitted to the first party. Transfer and receipt of evidence that would be an attachment which is an integral part of this agreement.</p> <p>In addition, to ensure compliance with regulations by the contractor, the company has a SOP for Contractor Work Regulations with document number 037 / BNS-KON / 18 No. revision 00 dated January 1, 2018. At point (h) the management unit will monitor the number of contractors, a list of workers names contractor, validity period of CLA and license (SIM / SIO) for work that requires these requirements.</p> <ul style="list-style-type: none"> • Interviews with representatives of the management, payment receipts cannot be shown due to PIC is responsible for not being in the Central Office. So, the data cannot be shown yet. • Results of the RSPO internal audit conducted on January 13-24, 2020, it is known that evidence of payment has not been shown. <p>Non-Conformance Description: Based on the explanation above, the management unit has not been able to showing that the system regarding the fulfillment of applicable legal obligations including evidence of payment of contractors and contractor workers is in accordance with applicable regulations.</p>					
Root Cause Analysis <i>(filled by organization audited):</i>					
Correction <i>(filled by organization audited):</i>					
Corrective Action <i>(filled by organization audited):</i>					
Assessor Evaluation and Conclusion <i>(filled by auditor):</i>					
Verified by	:				

NCR No.	: 2020.02	Issued by	: Briyogi Shadiwa
Date Issued	: 26 March 2020	Time Limit	: 25 June 2020
NC Grade	: Critical	Date of Closing	: 08 June 2020
Standard Ref. & Requirement	: 7.7.3. (C) Subsidence of peat is monitored, documented and minimized.		
Evidence observed: <p>The company has procedures or work instructions for planting on peatlands in the technical SOP for planting on peatlands contained in Section 4, Section 5, Section 8 and Section 10 of the Agronomy Reference Manual No. Policy: 110 / EST-ARM / 13. However, in the procedure there are no guidelines for the installation / placement of subsidence pole as a measure of peatland subsidence that refers to the guidelines "RSPO Peatland Working Group meeting on 13-14 September 2018 to clarify potential audit guidance for Criteria 7.7 (as adopted by GA)" Which, companies must have 1 subsidence stake in every 240 ha of peat area. For peat areas with more than 5000 ha, the number of stakes can be reduced from these requirements if the company has justification.</p> <p>From the results of field observations and document reviews, only 2 subsidence stakes were found at Mandah Estate and 2 subsidence stakes at Rotan Semelur Estate. The management also explained, that currently the company does not have procedures related to the peat subsidence stake.</p>			
Non-Conformance Description: <p>monitoring procedures for peat subsidence have not yet fully complied with RSPO guidelines.</p>			
Root Cause Analysis <i>(filled by organization audited):</i> <p>This is a new indicator that requires further understanding for company. The reference used for the determination of the previous pole installation is based on the attachment to the revised of environment document (RKL-RPL No. 11 / IH-RKL-RPL / V / 2006), which mentions the location of several sampling points at different locations of the planting year</p>			
Correction <i>(filled by organization audited):</i> <ul style="list-style-type: none"> Conducted socialization and coordination with the Minamas Research Center (MRC) related to the new RSPO P&C and attended the Indonesia National Interpretation (INA NI) Webinar on the RSPO Principles and Criteria (P&C) 2018 on May 20, 2020 Coordinate with the MRC to establish procedures for installing subsidence pole in accordance with RSPO guidelines. The Minamas Research Center (MRC) establishes procedures and subsidence observation points at PT BNS, adding 14 new points from existing 10 points so that there will be a total of 24 subsidence observation points at PT BNS. Determination of the point is based on peat thickness, peat maturity and drainage zoning system. 			
Corrective Action <i>(filled by organization audited):</i> <p>Monitor the subsidence pole based on procedure and evaluate every month.</p>			
Assessor Evaluation and Conclusion <i>(filled by auditor):</i> <p>Verification May 17th, 2020 The company explained that the improvement activities were carried out after the Large-Scale Social Restrictions</p>			

program after there was stopped by the Government. However, the company still has to explain further related to the root cause analysis related to the latest RSPO indicators along with a written program (documentation) related to plans to improve subsidized pole determination.

Verification June 8th, 2020

The company shows evidence of improvements in the form of:

- Document for determining the location of the installation of peat subsidence observations by the Minamas Research Center.
- SOP Observation of peat surface subsidence (June 1, 2020) by the Minanams Research Center.

In the document, the company plans to add 14 new subsidence points (a total of 24 points) with reference to the latest RSPO guidelines (*"RSPO Peatland Working Group meeting on 13-14 September 2018 to clarify potential audit guidance for Criteria 7.7 (as adopted by GA)." by the Minamas Research Center.* The company has also established a procedure for observing peat subsidence every 6 months (for each monitoring point), where measurement results will be recorded, reported and corrected for evaluation. Currently the management is in the process of installing stakes while awaiting the relaxation of the Government's Large-Scale Social Restrictions program.

Based on this explanation, the non-conformities have been fulfilled and will be further verified related to the consistency of its application in the next assessment.

Verified by	: Briyogi Shadiwa
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NCR No.	: 2020.03	Issued by	: Briyogi Shadiwa
Date Issued	: 26 March 2020	Time Limit	: 25 June 2020
NC Grade	: Critical	Date of Closing	: 08 June 2020
Standard Ref. & Requirement	7.7.5 (C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.		
Evidence observed: The company conducted a drainability study on PT Bhumireksa Nusasejati's peatlands in November 2017. However, the peatland drainage study did not fully refer to the RSPO guidelines in the Drainability Assessment Procedure for Replanting of Existing Palm Oil on Peatlands November 2019. Where the guidelines instruct, among others: <ul style="list-style-type: none">• Determine the number of years before the land will subside to the drainage base (assuming constant subsidence rate).• If the time before the site subsides to the drainage base is ≥ 40 years, the area may be replanted whereas if it is <40 years replanting is not allowed. From the results of the document review, the company still has replanting activities for the next 5 years.			

Non-Conformance Description: Based on that objective evidences, the peat drainability study has not fully referred to the RSPO guidelines.	
Root Cause Analysis <i>(filled by organization audited):</i> Drainability assessment report is on progress during the surveillance assessment.	
Correction <i>(filled by organization audited):</i> Shows report of drainability assessment that are in accordance with RSPO guidelines.	
Corrective Action <i>(filled by organization audited):</i> Follow and ensure all the recommendation results from drainability assessment report accordance with RSPO guidelines.	
Assessor Evaluation and Conclusion <i>(filled by auditor):</i> Verification May 17th, 2020 The company explained that the improvement activities were carried out after the Large-Scale Social Restrictions program after there was stopped by the Government. However, the company still has to explain further related to the root cause analysis related to the latest RSPO indicators along with a written program (documentation) related to drainability assessment report. Verification June 8th, 2020 The company shows evidence of improvement in the form of PT Bhumireksa Nusasejati's 2020 Peatland Drainability Study Document by the Minamas Research Center. The document explains information that refer to guidelines set by the RSPO, such as: <ul style="list-style-type: none"> Based on the calculation of the 2x planting cycle threshold, the assessment location has not yet reached the threshold, so that replanting activities can be carried out with due regard to water management. From the study data, the fastest drainage base is in the fields B035 (93 years), C034 (101 years) and C035 (101 years). Based on this explanation, the non-conformities have been fulfilled and will be further verified related to the consistency of its application in the next assessment.	
Verified by	: Briyogi Shadiwa

NCR No.	: 2020.04	Issued by	: Trismadi N
Date Issued	: 26 March 2020	Time Limit	: 25 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):

- 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.

Non-Conformance Description (filled by auditor):

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).

Root Cause Analysis (filled by organization audited):

PT BNS has not received information from Management Sime Darby after August 9, 2019.

Correction (filled by organization audited):

GSQM coordinated with Sime Darby for the reporting process and LUCA status of PT BNS and obtained progress status until April 16, 2020.

Corrective Action (filled by organization audited):

GSQM will continue to coordinate with Sime Darby to update the LUCA report to the RSPO

Assessor Evaluation and Conclusion (filled by auditor):
Verification, May 11, 2020.

The Certification Unit shows the LUCA report status table for PT BNS dated May 11, 2020, which informed the external audit date of March 16-21, 2020, reviewer by 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.*

Verification, May 14, 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 Sime Darby 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 Conclusions :

Based on above explanations, this nonconformities has been closed.

Verified by

: Trismadi N

3.4.3. Opportunity for Improvement

No	Ref. Std.	Description
1	3.8.5	The company ensured that the Fruit Delivery Certificate (SPB) and the Weigh Tickets were labeled (stamped) in accordance with the memorandum of RSPO Supply Chain System No.002 / PSQM-UM / II / 2013 dated February 27, 2013
2	3.8.16	The company makes sure to monitor conventional sales data and is sure to be removed before the external audit activity is carried out (Observation).
3	7.8.4	The company ensures that the extension of surface water extraction permit number 503 / DPMTSP-SIPAP / 03 dated March 29, 2018 will expire.

3.4.4. Noteworthy Positive Components

No	Description
1.	Commitment to implement the principles of sustainable management of oil palm plantations.
2.	The company has competent human resources in their respective fields.

3.5 Summary of Arising Issues from Public and Auditor Verification.

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Teluk Bente Village, Sub-Village of Parit Berayun II</p> <ul style="list-style-type: none"> - The company has a good relationship with the surrounding communities. - The company has realized the CSR during last year, for example: shuttle boat for children from the village to the school. - The company has conveyed information related to employment opportunities. However, the majority of people prefer to work in their own fields. - The company has informed about opportunities for outsourced activities, such as: palm kernel loading activity. - The company has carried out socialization to the communities regarding the emergency response for fire. In addition, the company has also formed a partnership of the Fire Care Society (<i>Masyarakat Peduli Api</i>). - There are no issues regarding fire and environment pollution during last year. - There is no land dispute or issue between the locals and Certificate Holder. 	<ul style="list-style-type: none"> - The company has been realized CSR program. Besides that, the company has given information to stakeholders related job opportunities.
<p>Tuesday, 17 March 2020. Secretary of Labor union PT BNS</p> <p>Based on interview with Secretary of labor union, its known labor union meeting was conducted on February 2020 it contains related:</p> <ul style="list-style-type: none"> • Harvesters complain about different FFB Estate and Mill, the difference can reach 400-600 kg per basket, for example Division 1 MDE which produces 18 baskets of FFB can be up to ± 6 tons. • Contract workers for MDE treatment (Pesticide applicators, Fertilizer, manual maintenance and others) for 2-3 years then unilaterally dismissed. The existence of contract workers for harvesting, some have been appointed as <i>PKWTT</i> (permanent workers). The initial land clearing was carried out since 2016. <p>Dues of member labor union as much as IDR 10,000, -. Medical check up was been conducted every 3 months especially for pesticide and fertilizer applicators. PPE has been given to every worker.</p>	<ul style="list-style-type: none"> - Regarding to complaint from worker sighted that been solved by both of parties on the bipartite meeting dated 14 February 2020 attended by all worker union unit board. - Based on document verification sighted that this agreement has been recorded by Manpower Agency of Indragiri Hulu Regency. - The latest medical checkup result has been verified by the auditor team.
<p>Committee Gender of Mandah Estate</p> <p>Based on interview with committee gender, there is no complaint and report related sexual harassment. The gender committee has been socializing mechanism of sexual harassment handling. The informant has been protected by the</p>	<p>There is no issues related committee gender.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>gender committee (anonym). Beside that there is a reproduction policy related menstruation for 2 days and Pregnancy from 1 ½ month before and after giving birth. Program gender committee for 2020 such as religious, immunization for baby, mutual assistance, cleaning activity and others. Every division has represented of gender committee. So, if there is case, they can report to the gender committee representative.</p>	
<p>Head of Industrial Relations & Work Requirements for Indragiri Hilir Regency (Department of Manpower and Transmigration)</p> <p>Based on interviews with the Head of Industrial Relations & Work Requirements for Indragiri Hilir Regency, it is known that:</p> <ul style="list-style-type: none"> • Wages refer to district minimum wage 2020 in the amount of IDR 2,984,696, -. • Contract workers has been recorded by the company. • The company has registered assurance membership and reported it to government. • There are still contract workers for harvesting, it is recommended that companies appoint as PKWTT (permanent workers). Many obstacles cause contract workers, for example, lack of harvester workers, high crop season, workers who need jobs, company finances and others. <p>Every information has been responded by the company.</p>	<ul style="list-style-type: none"> - Based on document verification sighted that the certification unit used last year minimum wage. It usually will be adjusted and pay for period January to March 2020 on the April 2020. - Based on contract workers on the harvesting activity, auditor team has verified the record of this agreement.
<p>(Head of Financing and Investment, Plantation Agency of Indragiri Hilir Regency).</p> <p>Assessment plantation business was conducted on 2018. Progress report plantation business was been send every 6 months (Semester II 2019). During the audit there is no complaint related location permit, plantation business permit, conflict and other. Every information has been responded by the company.</p>	<p>There is no issues related plantation agency.</p>
<p>Head of the Land Handling and Control Section of Indragiri Hilir Regency (National Land Agency).</p> <p>Based on interview, there is no the addition related Land use permit and location permit. Total Land Use Permit for PT BNS as much as 25,662 ha. There is issue related 5000 ha was been occupied by the community. It has been measured by Region Office of BPN, the management want to releasing the land area. Every information has been responded by the company.</p>	<p>There are no issues related land conflict, the progress of HGU still waiting from office of provincial land region and take a long time.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>CV Heheng (Contractor of Housing in Mandah Mill).</p> <p>Based on interview its known:</p> <ul style="list-style-type: none"> • CLA between the Company and the Contractor for 3 years. • The number of contractor workers is 6 people for housing construction in Mandah Factory housing area. • CLA between contractor and worker members once a year. • Insurance Health and Labor provided by the Contractor. • PPE such as helmets and shoes are provided by the Contractor. • The company provides housing for contractors with facilities such as electricity, water and others. 	<p>There are no issues related contractors. They have been paid routinely.</p>

4.0	CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY
4.1	Formal Sign-off of Assessment Findings <p>Hereunder sign by management representative from inspected company to acknowledge a field assessment and agree for all content explained in this assessment report, included of non-compliance findings.</p> <p>Signed on behalf of:</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;"> <p>PT Bhumireksa Nusasejati Management Representative</p>  <p><u>Alagendran Maniam</u> Monday, 08 June 2020</p> </div> <div style="text-align: center;"> <p>Mutuagung Lestari Lead Auditor</p>  <p><u>Trismadi Nurbayuto</u> Monday, 08 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	Mandah Estate: - 3 Spraying Workers - 2 Harvester - 2 Leaf analyzers - 2 nurses - 1 Store keepers for fertilizer, agrochemicals (pesticides) and Hazardous Waste Store. - 1 generator operator - 1 PPE and rinse house	PT Bhumireksa Nusasejati	-	Field Observation and Interview	March 17 th , 2020	V	-
2	Rotan Semelur Estate: - 4 Spraying Workers. - 2 Racking Workers. - 2 Nurse - 1 Store keepers for fertilizer, agrochemicals (pesticides) and Hazardous Waste Store. - 1 generator operator - 1 PPE and rinse house	PT Bhumireksa Nusasejati	-	Field Observation and Interview	March 18 th , 2020	V	-
3	Mandah POM: - 2 Boiler Operators. - 1 Engine Operator - 1 Grading Workers. - 1 Sterilizer Workers - 1 Warehouse officer. - 1 WTP operator - 1 Chemical warehouse worker - 1 WWTP operator	PT Bhumireksa Nusasejati	-	Field Observation and Interview	March 17 th , 2020	V	-
4.	Teluk Bente Village, Sub-Village of Parit Berayun II	PT Bhumireksa Nusasejati	-	Interview	March 17 th , 2020	V	-
5.	Secretary of Labor union PT BNS	PT Bhumireksa Nusasejati	-	Interview	March 17 th , 2020	V	-
6.	Committee Gender of	PT Bhumireksa	-	Interview	March 17 th , 2020	V	-

	Mandah Estate	Nusasejati			2020		
7.	Head of Industrial Relations & Work Requirements for Indragiri Hilir Regency (Department of Manpower and Transmigration)	PT Bhumireksa Nusasejati	-	Interview by phone	March 17 th , 2020	V	-
8.	Head of Financing and Investment, Plantation Agency of Indragiri Hilir Regency.	PT Bhumireksa Nusasejati	-	Interview by phone	March 17 th , 2020	V	-
9.	Head of the Land Handling and Control Section of Indragiri Hilir Regency (National Land Agency).	PT Bhumireksa Nusasejati	-	Interview by phone	March 17 th , 2020	V	-
10.	CV Heheng (Contractor of Housing in Mandah Mill).	PT Bhumireksa Nusasejati	-	Interview	March 17 th , 2020	V	-
11.	Walhi	Jakarta	info@walhi.or.id	Via Email	March 3 rd , 2020	-	V
12.	WWF	Jakarta	wwf-indonesia@wwf.or.id	Via Email	March 3 rd , 2020	-	V
13.	Sawit Watch	Jakarta	info@sawitwatch.or.id	Via Email	March 3 rd , 2020	-	V
14.	AMAN	Jakarta	rumahaman@cbn.net.id	Via Email	March 3 rd , 2020	-	V
15.	Aid Environment	Jakarta	info@aidenvironment.org	Via Email	March 3 rd , 2020	-	V

Appendix 2. Assessment Program

DATE	16 – 26 March 2020	
PROGRAM	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 16 March 2020		
06.20 – 08.15	Travelling from Jakarta to Batam	• All Auditor
09.00 – 15.00	Travelling from Batam Airport to PT BNS	
16.00 – 17.00	Opening Meeting: <ul style="list-style-type: none">• Auditee Speech (Introduction of PIC, Profile of Mill and Estates Management Unit).• Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Determine of Field Visit Audit, Transparency and Confidentiality Clarification).	
Tuesday, 17 March 2020		
08.00 – 12.00	<ul style="list-style-type: none">• Public consultation to Government Agency by phone.• Public consultation to surrounding communities & local contractor (if any)• Public consultation to internal stakeholder (worker union, gender committee, cooperation) & contractor	• BRP
	<ul style="list-style-type: none">• Field Observation at Mandah Estate:• Activities of Harvesting & Transportation, Fertilize, Pesticides Application, canal Maintenance and Biological Control Monitoring• Landfill, Fire Control Facilities (simulation), Chemical Storage, Fertilizer Storage, Hazardous Waste Storage and workshop• Housing, School, Worship Place, Clinic, generator room and Reservoir• Land Use, Legal Boundaries, HCV/ conservation area	<ul style="list-style-type: none">• BSH• TNB/NCH• TNB/NCH• TNB/NCH
12.00 – 14.00	Break	
14.00 – 17.00	Field Observation to Mandah POM: <ul style="list-style-type: none">• Security post, WB, laboratory, SCCS• Loading ramp, processing station, engine room, boiler, workshop, Hydrant simulation• Housing, health clinic, clean water, etc• Drainage, solid waste, Hazardous storage, Hazardous Waste Storage, WTP, WWTP	<ul style="list-style-type: none">• BRP/BSH• TNB/NCH• TNB/NCH• TNB/NCH• BRP/BSH
Wednesday, 18 March 2020		
08.00 – 12.00	<ul style="list-style-type: none">• Field Observation at Rotan Semelur Estate:• Activities of Harvesting & Transportation, Fertilize, Pesticides Application, canal Maintenance and Biological Control Monitoring• Landfill, Fire Control Facilities (simulation), Chemical Storage, Fertilizer Storage, Hazardous Waste Storage and workshop• Housing, School, Worship Place, Clinic, generator room and Reservoir• Land Use, Legal Boundaries, HCV/ conservation area	<ul style="list-style-type: none">• BSH/TNB• NCH/BRP• NCH/BRP• NCH/BRP

12.00 – 14.00	Break	
14.00 – 17.00	Document Verification: <ul style="list-style-type: none"> • Basic Information (clarification) • Legal Demarcation Aspect (Inspection of Legal Boundary Stones, Community Buffer Area/Enclave) • SCCS • Agronomy (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) • Occupational Health & Safety Aspect (PPE Used in Harvest, Manure & Pesticide Application) and Worker Welfare. • Worker's Facilities Aspect (Housing, Daycare, Sports Facilities, Employees Meeting Hall, Sanitary Facilities) & Fire Control Facilities, Waste Management) • Environmental/Conservation Aspect (Inspection of HCV Identified Area, Riparian/Waterways Zone, Reservoir, Forest Area, Peat Area (Water management, etc), Chemical Storage, Fertilizer Storage, Hazardous Waste Storage. 	<ul style="list-style-type: none"> • All Auditor
Thursday, 19 March 2020		
08.00 – 14.00	Travelling from PT BNS to Batam.	All Auditor
18.00 – 20.00	Travelling from Batam to Jakarta	All Auditor
Friday, 20 March 2020 until Wednesday, 25 March 2020		
08.00 – 17.00	Remote Audit due to Pandemic of COVID-19 Document verification and Completing of Check List.	All Auditor
Thursday, 26 March 2020		
11.00 – 12.30	Closing Meeting	All Auditor