

***Roundtable on Sustainable Palm Oil Certification
R S P O*****[✓] Surveillance**

Name of Management Organisation : **POM 2 – PT Bio Inti Agrindo subsidiary of PT Bio Inti Agrindo**
Plantation Name : PT Bio Inti Agrindo: Estate B, Estate C and Plasma (Division 2, 3, 4).
Location : Village of Mandekman, Sub District of Ulilin, District of Merauke, Province of Papua, Indonesia
Certificate Code : **MUTU-RSPO/159**
Date of Certificate Issue : 13 September 2021 Date of License Issue : 13 December 2022
Date of Certificate Expiry : 12 September 2026 Date of License Expiry : 12 September 2023

Assessment	Assessment Date	PT Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-1	29 and 30 August, 1, 2, 3, 5 to 6 September 2022	Hasiholan Sihombing (Lead Auditor), Rahmat Abdiansyah, Sentot Adi Subandono and Mia Rahmah Qadryani	Briyogi Shadiwa	Leonada

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-1	12 December 2022

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Figure 1. Location Map of PT Bio Inti Agrindo

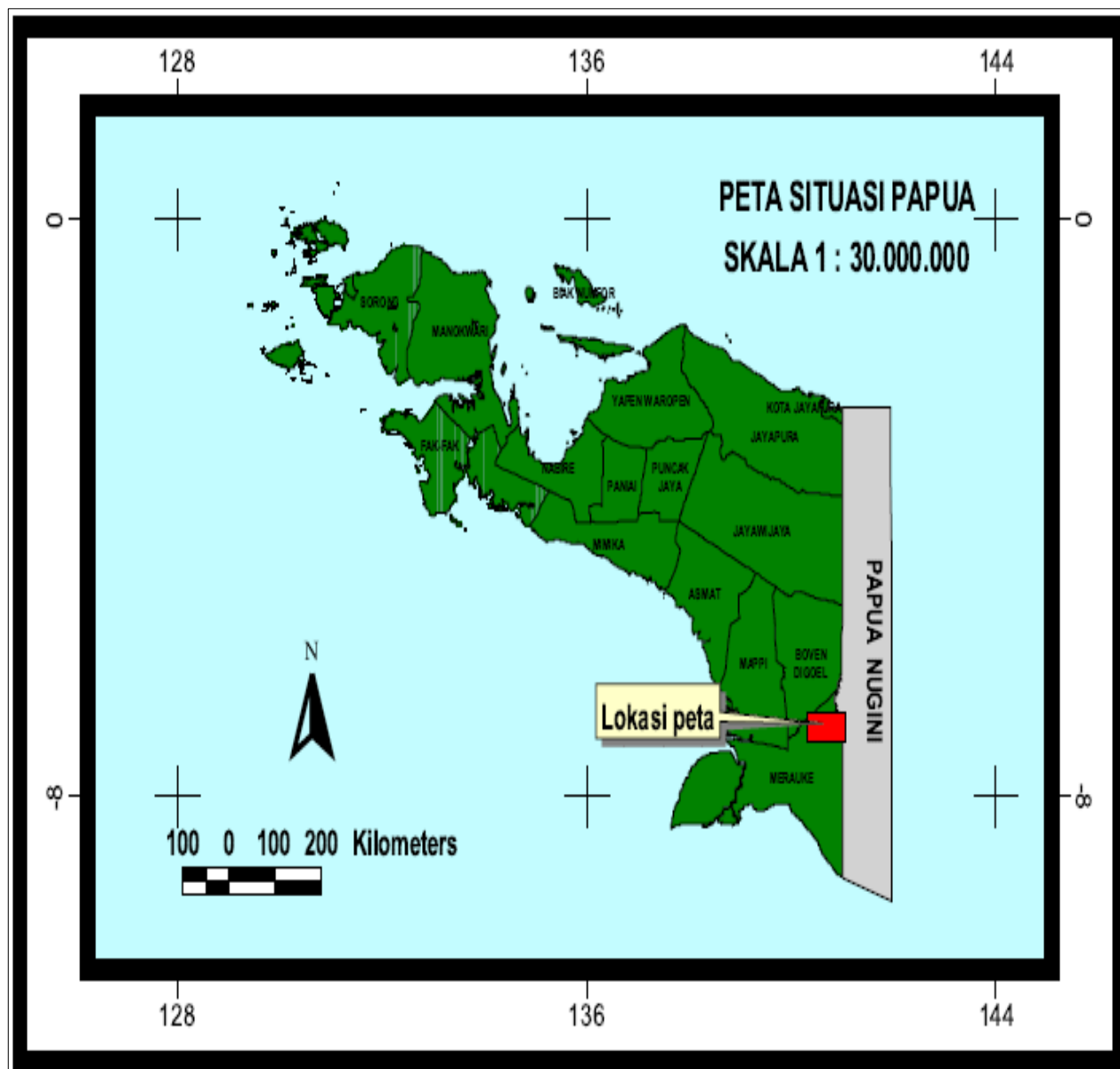
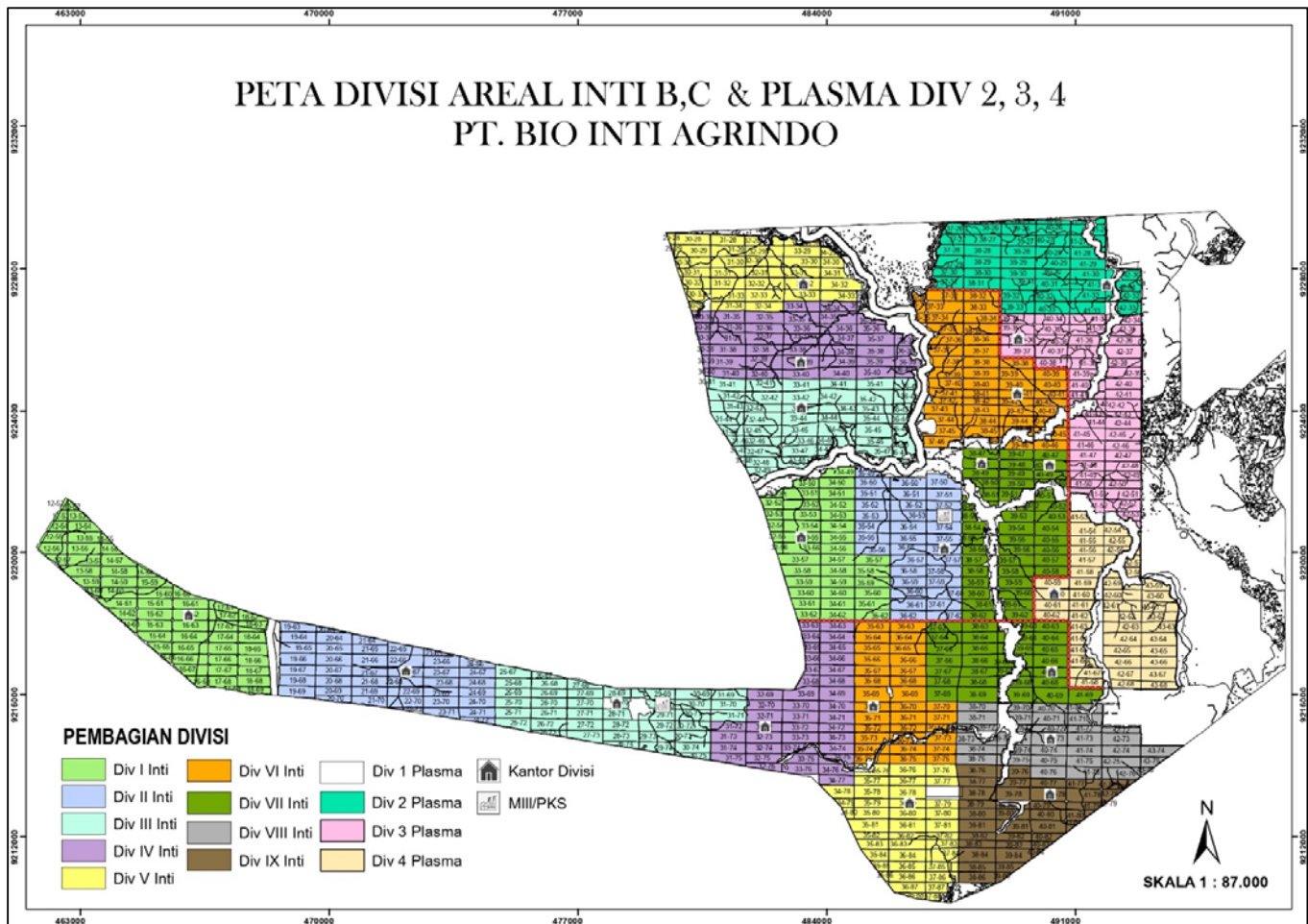


Figure 2. Operational Map of PT Bio Inti Agrindo – POM 2, Estate B, Estate C and Plasma



Abbreviations Used

AMDAL	:	Environmental Impact Analysis
ANDAL	:	Environmental Impact Analysis
BKSDA	:	Natural Resources Conservation Centre
BOD	:	Biochemical Oxygen Demand
BTN	:	Balai Taman Nasional/National Park Hall
BPJS	:	Social Security Administrator
CDKLH	:	Environment Agency
COD	:	Chemical Oxygen Demand
CPO	:	Crude Palm Oil
DLH	:	Environment Agency
DPMTSP	:	Integrated Investment and Licensing Service
DPUPR	:	Department of Public Works and Spatial Planning
FFB	:	Fresh Fruit Bunches
FGD	:	Forum Group Discussion
FPIC	:	Free, Prior, Informed and Consent
GHG	:	Green House Gas
HCV-ALS	:	High Conservation Value - Assessor Licensing Scheme
HIRAC	:	Hazard Identification and Risk Assessment Control
HGU	:	Cultivation Right
JKM	:	Life insurance
JKK	:	Accident insurance
KITAS	:	Temporary Stay Permit Card
KepmenLH	:	Decree of the minister of environment
KLDKLH	:	Environment Agency
K3	:	Occupational Health and Safety
LA	:	Land Application
MB	:	Mass Balance
PJK3	:	Occupational health and safety company
PK	:	Palm Kernel
PKB	:	Collective labour agreement
POM	:	Palm Oil Mill
PPE	:	Personal Protective Equipment
PR	:	Public Relation
PT BIA	:	Perseroan Terbatas Bio Inti Agrindo
P2K3	:	Occupational health and safety advisory committee
RKL	:	Environment Management plan
RPL	:	Environmental Monitoring Plan
RSPO	:	Roundtable Sustainable Palm Oil
RTE	:	Rare, Threatened and Endangered
SIA	:	Social Impact Assessment
SIO	:	Operator license
SPK	:	Work agreement

TPSA	:	Final Waste Disposal Site
TPS LB3	:	Hazardous Warehouse
TSS	:	Total Suspended Solid
SOP	:	Standard Operational Procedure
SPSI	:	Worker union
WWF	:	World Wildlife Fund
WWTP	:	Waste Water Treatment Processes

1.0	SCOPE of the CERTIFICATION ASSESSMENT		
1.1	Assessment Standard Used	<ul style="list-style-type: none">RSPO Certifications Systems for Principles & Criteria and RSPO Independent Smallholders Standard (Endorsed by RSPO Board of Governors on 12 November 2020).Indonesia National Interpretation RSPO Principles and Criteria for the Production of Sustainable Palm Oil 2018 Endorsed by the RSPO Board of Governors on 20th April 2020.	
1.2	Organisation Information		
1.2.1	Organisation name listed in the certificate	PT Bio Inti Agrindo	
1.2.2	Contact person	Kartika Dewi	
1.2.3	Organisation address and site address	Central Office: Gedung Pacific Century Place, Lantai 17, SCBD Lot 10, Jl. Jendral Sudirman Kav. 52 - 53, Jakarta 12190, Indonesia.	
1.2.4	Telephone	+ 62 21 80864070	
1.2.5	Fax	+ 62 21 80864100	
1.2.6	E-mail	bia@ptbia.co.id	
1.2.7	Web page address	www.ptbia.co.id	
1.2.8	Management Representative who completed the application for certification	Kartika Dewi	
1.2.9	Registered as RSPO member	1-0257-18-000-00 (27 July 2018)	
1.3	Type of Assessment		
1.3.1	Scope of Assessment and Number of Management Unit	Palm Oil Mill and its supply base: POM 2, Estate B, Estate C and Plasma (Division 2, 3 and 4)	
1.3.2	Type of certificate	Single	
1.4	Locations of Mill and Plantation		
1.4.1	Location of Mill		
	Name of Mill	Location	Coordinate
			LatitudeLongitude
	POM 2	Mandekman Village, Ullin Sub District, Merauke District, Papua Province, Indonesia	S 07° 05' 50"E 140° 48' 30"
1.4.2	Location of Certification Scope of Supply Base		
	Name of Supply Base	Location	Coordinate
			LatitudeLongitude
	Estate B	Mandekman Village, Ullin Sub District, Merauke District, Papua Province, Indonesia	S 07° 05' 45"E 140° 48' 05"
	Estate C	Mandekman Village, Ullin Sub District, Merauke District, Papua Province, Indonesia	S 07° 01' 55"E 140° 53' 25"
	Plasma (Division 2, 3, and 4) (269 members)	Mandekman Village, Ullin Sub District, Merauke District, Papua Province, Indonesia	S 06° 59' 18"E 140° 55' 35"

1.5	Description of Area Statement						
1.5.1	Tenure						
	• State	27,527.62			Ha		
	• Community				- Ha		
1.5.2	Area Statement						
		Estate B	Estate C	Plasma (Division 2, 3 and 4)	Total		
	• Total area	11,724.39	10,285.53	5,517.70	27,527.62		
	• Mature area	8,866.14	7,437.02	3,549.01	19,852.17		
	• Immature area	-	-	-	-		
	• Mill	23.30	32.35	-	55.65		
	• Emplishment	29.12	28.16	10.00	67.28		
	• Road, bridge and trench	188.47	148.90	70.99	408.36		
	• River, valley, hill, swamp	332.67	294.90	127.33	754.90		
	• Water bodies	1.00	1.00	-	2.00		
	• HCV	2,283.69	2,343.20	1,760.37	6,387.26		
1.6	Planting Year and Cycles						
1.6.1	Age profile of planting year						
	Planting Year	Hectarage (Ha)					
		Estate B	Estate C	Plasma (Division 2, 3 and 4)	Total		
	2014	2,907.07	-	-	2,907.07		
	2015	3,444.51	2,180.02	-	5,624.53		
	2016	1,352.06	3,881.95	-	5,234.01		
	2017	1,155.59	1,326.22	3,549.01	6,030.82		
	2018	6.91	48.83	-	55.74		
	TOTAL	8,866.14	7,437.02	3,549.01	19,852.17		
1.6.2	New Planting area after January 2010		19,852.17 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 (tones/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel	
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)
	POM 2	60	462,140.33	103,811.19	22.46	15,177.46	3.28
	*Production data source from 12 months before assessment (August 2021 to July 2022)						
1.7.2	Description of Certification Scope of Supply Base						

	Name of Estates	Total Area (Ha)	Production Area (Ha)	FFB (tones/year)	Yield (tonnes/ha/ year)	Supplied to Mill	
						FFB (tonnes/ year)	%
	Estate B	11,724.40	8,866.14	265,874.47	29.99	222,214.18	83.58
	Estate C	10,285.53	7,437.02	198,288.38	26.66	192,508.49	97.09
	Plasma (Division 2, 3, and 4)	5,517.69	3,549.01	46,598.65	13.13	46,316.19	99.39
	TOTAL	27,527.62	19,852.17	510,761.50	25.73	461,038.86	90.26
	<i>*Production data source from 12 months before assessment (August 2021 to July 2022)</i>						
1.7.3	FFB description from other source						
	Name of sources/Organisation	Type of Organisation	Number of smallholders	Production Area (Ha)	Supplied to Mill		
					FFB (tonnes/year)		
	Estate A (RSPO Certified)	PT Bio Inti Agrindo	-	4,862.85	1,175.11		
	PT IJS (Non-RSPO Certified)	Independent Supplier	-	-	156.20		
	TOTAL					1,331.31	
	<i>*Production data source from 12 months before assessment (August 2021 to July 2022)</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)		Actual Certified Volume (August 2021 to July 2022) (MT)	
	FFB Processed			270,000		462,140.33	
	CPO Production			64,800		97,020.60	
	Palm Kernel (PK) Production			8,640		14,079.99	
1.8.2	Product selling						
	Type of selling product			Actual selling product for last year (August 2021 to July 2022) (MT)			
	CSPO sold as RSPO certified product			-			
	CSPK sold as RSPO certified product			-			
	CSPO sold under another scheme			-			
	CSPK sold under another scheme			-			
	CSPO sold as conventional			-			
	CSPK sold as conventional			-			
1.8.3	Estimate of Certified FFB Claim						
	Name of Estates	Total Area (Ha)	Production Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)		
	Estate B	11,724.40	8,866.14	270,000	30.45		
	Estate C	10,285.53	7,437.02	200,000	26.89		

	Plasma (Division 2, 3, and 4)	5,517.69	3,549.01	50,000	14.09			
	TOTAL	27,527.62	19,852.17	520,000	26.19			
	<i>*Projected FFB production for 12 months of certificate</i> <i>**Due to sanction, the production of FFB, CPO and PK cannot be claim as RSPO product.</i>							
1.8.4	Estimate of Certified Palm Product Claim							
	Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO Out put (tonnes)	Extraction (%)	Palm Kernel Out put (tonnes)	Extraction (%)	Supply Chain Module
	POM 2	60	520,000	117,000	22.50	18,200	3.50	MB
	<i>*Projected CSPO and CSPK production for 12 months of certificate</i> <i>**Due to sanction, the production of FFB, CPO and PK cannot be claim as RSPO product.</i>							
1.9	Other Certifications							
	Others			MUTU-ISPO/179 date on August 22, 2019 – August 21, 2024.				
1.10	Time Bound Plan							
1.10.1	Time Bound Plan for Other Management Units							
	Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status		
	MILL	Time Bound Plan						
	POM 1	2020	Estate A	2020	District of Merauke, Province of Papua, Indonesia	IC		
	POM 2	2020	Estate B	2020	District of Merauke, Province of Papua, Indonesia	IC		
			Estate C	2020	District of Merauke, Province of Papua, Indonesia	IC		
	Time bound plan approved on 2020.							
1.10.2	Progress of Associated Smallholders and Out growers for Certifiable Standard							
	Smallholder are included in scope of certification.							

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-1	<p>1. Hasiholan Sihombing (Lead Auditor). Indonesian citizen. Bachelor of Agriculture Majoring in Agronomy, Agriculture Faculty. He has working experienced for 7 (seven) years since 2009 as an Operational Staff in an Oil Palm Plantation Company in Indonesia. The training he has followed namely: Lead Auditor ISPO in 2016, RSPO P&C Lead Auditor Course in 2018, RSPO Supply Chain Certification Lead Auditor Course in 2020, SA 8000 Awareness in 2018, Quality Management Systems (ISO 9001:2015) in 2016, Environmental Management Systems (ISO 14001:2015) in 2017, OHS General Expert in 2013, OHSAS 18001:2007 in 2017, ISO 19011:2018 in 2019, ISO 17021:2011 and ISO 17065:2012 in 2016. During this audit, he assigned to verify legal aspect, land dispute and SCCS.</p> <p>2. Rahmat Abdiansyah (Auditor). Indonesian citizen. Bachelor of Forestry from IPB University, with major in Forest Resources Conservation and Ecotourism. Has experience working in the Indonesian Palm Oil Farmers Organization and Indonesian private oil palm plantation companies. Participate in ISPO and RSPO Internal Auditor training in 2018, ISPO and P&C Certification Systems IHT in 2019, IHT ISO 19011, ISPO Auditor Training in 2020, RSPO Lead Auditor Training in 2020, ISO 14001 and ISO 9001 Lead Auditor Training in 2020, and awareness of the RSPO Certification System and the RSPO P&C in 2019 and 2020. During this assessment, he verified the aspects of environment, conservation and GHG aspect.</p> <p>3. Sentot Adi Subandono (Auditor). Indonesia citizen, Bachelor of Agriculture, Department of Agricultural Cultivation. He has five years of experience working since 2005 as Plantation Operational Staff and nine years as Internal Auditor in private oil palm plantations in Indonesia. The training that has been attended includes the Basic Management Development Program of Palm Oil Plantation, Use of Limited Pesticides, Best Practices in Internal Auditing, Fraud Auditing: Prevention, Detection, and Investigation, Operational Risk Approach in Internal Auditing, General Occupational Health and Safety Expert, ISPO Auditor Training in 2016, ISO 9001: 2015, RSPO Lead Auditor Training in 2020. During this assessment, verified the aspects of Best Management Practices and OHS Aspect.</p> <p>4. Mia Rahmah Qadryani (Auditor Trainee). Indonesian citizen. Bachelor of Agriculture Majoring in Pest and Plant Disease, Universitas Padjadjaran. The training she has followed namely: ISO 9001 and ISO 19011 Lead Auditor Training in 2021, ISPO Auditor Training in 2022, Awareness ISO 17021 in 2021, Awareness ISO 17065 in 2021, Awareness ISO 14001 in 2021, and Awareness ISO 45001 in 2021. She has participated in several audit simulation activities related to the social and worker welfare. During this audit, she verified Worker Welfare and Transparencies supervised by Lead Auditor.</p> <p>Curriculum vitae (CV) of the members and the assessment team is available at the PT Mutuagung Lestari office.</p>
2.2	Assessment Methodology, Assessment Process and Locations of Assessment
2.2.1	Figure of person days to implement assessment
ASA-1	<p>Number of auditors: 3 auditors and 1 trainee auditor</p> <p>Number of days for ASA-1 Audit: 6 days</p> <p>Number of working days for ASA-1 Audit: 18 Working days</p>
2.2.2	Assessment Process
ASA-1	<p>The assessment was conducted by measuring the implementation of certification system and standard conducted by PT Bio Inti Agrindo, POM 2 Unit Certification based on:</p> <ul style="list-style-type: none"> RSPO Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesian National Interpretation, Endorsed by the RSPO Board of Governors on 20th April 2020 RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020 <p>The scope of certification of PT Bio Inti Agrindo consist of one mill (POM 2) and three estates (Estate B, Estate C and Plasma (Division 2, 3 and 4)).</p> <p>The audit program is included as Appendix II. The approach to the audit was to treat the mill and its supply base as an</p>

RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The assessment was conducted in three methods: (1) document review, aiming to observe the sufficiency of types or substances from required documents; (2) interview, aiming to obtain more detailed information and cross check the information; and (3) field observation, aiming to observe directly the sufficiency of implementation on site. Some opportunities for improvement of the results ASA-1 by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment. Improvement of findings from IC findings were observed by auditors at this assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA-1.

The auditor's journey from the airport in Merauke to the audit location takes about 3-4 hours. The opening meeting was held on 29 August 2022 in PT BIA office. As for the participants who attended the online opening meeting included the General Manager, Estate and Mill Managers, Sustainability staff, Support Team from Jakarta and other staff. Closing meeting was held on 6 September 2022 attended by the same participants as the opening meeting. Management PT Bio Inti Agrindo accepted all this audit results.

During the COVID-19 pandemic, there were several modifications to the audit activity due to health protocols. Audit process carried out with high safety protocol procedure that developed by Certification Body and the unit of certification. Before an onsite audit carried out, there are several meetings to discuss health protocol procedures. There are several activities that are not possible to do face to face, such as public consultations with government agencies so that these activities are carried out by telephone.

Public Stakeholder Notification was made on MUTU Website and RSPO Website. There is no written negative feedback receive. Stakeholder consultation involved internal and external stakeholders. Discussion was held with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each discussion, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings. The comments made by external stakeholders were also taken into account in the assessment.

Commonly, the audit activities went well with good cooperation from the unit management. The presentation of documents is presented quite well by involving related personnel.

All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU).

The assessment program please find Appendix 2.

2.2.3 Locations of Assessment

ASA-1

The sampling location consider the issue arose from the review documents and stakeholder's consultation that are fundamental and crucial. On this assessment sample locations that visited and respondent that interviewed by team auditor are:

POM 2

- **Security Post.** Field observations and interviews related to labor and OSH aspects.
- **Weighbridge.** Field observations and interviews related to employment aspects and SCCS
- **WTP.** Observations and interviews related to water management, recording of water use, health checks, PPE and waste management.
- **Hazardous Waste Temporary Storage.** Observations and interviews with officers related to work procedures, OHS, wages and environmental management.
- **Sparepart Warehouse.** Field observations and interview related sparepart management, OHS, and environmental aspect.

- **Chemical and Fuel warehouse.** Field observations and interview related chemical management, OHS, and environmental aspect.
- **Workshop.** Field observations workshop activity, OHS, environmental and worker welfare aspect.
- **Sortation.** Field observations and interviews related to technical work, OHS aspects, employment, social, ethics, and the environment.
- **Press.** Field observations and interviews related to technical work, OHS aspects, employment, and social.
- **Kernels.** Field observations and interviews related to technical work, OHS aspects, employment, and social.
- **Engine room.** Field observations and interviews related to technical work, OHS aspects, employment, and social.
- **Boilers.** Field observations and interviews related to technical work, OHS aspects, employment, and social.
- **WWTP.** Field observations related to WWTP entry, runoff, effluent testing. Officers are equipped with PPE and effluent discharge records.
- **Water Source Reservoir.** Observations and interviews related to water management, recording of water use, health checks, PPE and waste management.
- **Empty bunch area.** Field observations related to empty bunch management.
- **Employee Housing.** Observation of the availability of infrastructure such as employee housing facilities, clean water facilities, educational facilities, religious facilities, health facilities and sports facilities.

Estate B

- **Block 33-37 Division 4 (HGU Pole No. 110).** Observation the conditions and position of legal boundary.
- **Block 35-81 Division 5 (HGU Pole No. 107).** Observation the conditions and position of legal boundary.
- **Block 35-84 Division 5 (HGU Pole No. 106).** Observation the conditions and position of legal boundary.
- **Block 41-79 Division 9 (HGU Pole No. 90).** Observation the conditions and position of legal boundary.
- **Block 42-78 Division 9 (HGU Pole No. 89).** Observation the conditions and position of legal boundary.
- **Block 36-74 Division 5 (HCV – Riparian of Nga River).** Observation of HCV management
- **Block 35-86 Division 5 (HCV – Riparian of Bundil River).** Observation of HCV management
- **Block 37-78 Division 5 (HCV – “Moyang Api” forest area).** Observation of HCV management
- **Block 42-72 Division 9 (HCV – Forest Conservation).** Observation of HCV management
- **Fertilizer Warehouse, Division 3 and 7.** Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used.
- **Agrochemicals Warehouse, Division 3.** Observation related to management of oil and agrochemical material and waste, MSDS, emergency response facilities and the types of pesticides used.
- **Spare part warehouse, Division 3.** Observation minimum stock of PPE.
- **Firefighting warehouse and simulation of firefighting equipment.** Observation related to OHS and firefighting facilities and emergency simulations.
- **Clinic.** Observations and interviews of health, environmental, training, and employment facilities.
- **Elementary School.** Observations and interviews of educational facilities, environmental, and employment.
- **Workshop.** Observations and interviews with officers related to material handling, work procedures, OHS, wages and environmental management.
- **Hazardous Waste Temporary Storage.** Observations and interviews with officers related to work procedures, OHS, wages and environmental management.
- **Pesticide mixing area.** Observation related pesticide mixing area, PPE storage, safety aspect.
- **Rinse House, Division 3 and 7.** Observations related to the management of agrochemical materials and waste, MSDS, emergency response facilities and types of pesticides used.
- **Housing Area, Division 3 and 7.** Observation of the availability of infrastructure such as employee housing facilities, clean water facilities, and electricity facilities.
- **Mobility of Graders.** Observations and interviews related to OHS aspects, employment, and social.
- **Spray, Block 39.81 Division 9.** Field observations and interviews related to technical work, OHS aspects, employment, social, and environment.
- **Beneficial plant, Turnera subulata Block 38.70 Division 8.** Field observations related to beneficial plant conditions.

- **Beneficial plant, *Cassia cobanensis* Block 38.70 and Block 38.79 Division 8.** Field observations related to beneficial plant conditions.
- **Beneficial plant, *Antigonon leptosus* Block 38.78 Division 8.** Field observations related to beneficial plant conditions.
- **Harvest, Block 38.70 Division 8.** Field observations and interviews related to technical work, OHS aspects, employment, social, and environment.
- **Load FFB, Block 38.70 Division 8.** Field observations and interviews related to technical work, OHS aspects, employment, social, and environment.
- **Fertilization, Block 40.74 Division 8.** Field observations and interviews related to technical work, OHS aspects, employment, social, and environment.
- **Land Application Block 31-69; 30-74 dan 33-70.** Field observations and interviews related to aspects of BMP, OHS, Environment and Employment.
- **Block 38-66 (Ngab River).** Observation of HCV management
- **Landfill Block 27-72 Divisi 3.** Observations related to domestic waste management.
- **Tower of fire Blok 28-70.** Field observations and interviews related to aspects of OHS and Environment aspects.

Estate C

- **Block 29-29 Division 5 (HGU Pole No. 225).** Observation the conditions and position of legal boundary.
- **Block 30-31 Division 5 (HGU Pole No. 224).** Observation the conditions and position of legal boundary.
- **Block 30-32 Division 5 (HGU Pole No. 223).** Observation the conditions and position of legal boundary.
- **Block 35-29 Division 5 (HCV – Bush Mandob forest area).** Observation of HCV management
- **Block 38-51 Division 7 (HCV – Lemon Port Forest and River).** Observation of HCV management
- **Wood tripe, Block 38.57 Division 7.** Field observations and interviews related to technical work, OHS aspects, employment, social, and environment.
- **Harvest Block 38.47 Division 7.** Field observations and interviews related to technical work, OHS aspects, employment, social, and environment.
- **Beneficial plants.** Field observations related to beneficial plant conditions.
- **Fertilizer warehouse, Division 5.** Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used.
- **Agrochemicals Warehouse.** Observation related to management of oil and agrochemical material and waste, MSDS, emergency response facilities and the types of pesticides used.
- **Spare part and PPE warehouse.** Observation minimum stock of PPE's.
- **Firefighting warehouse and simulation of firefighting equipment.** Material handling observations for OHS and simulations.
- **Clinic.** Observations and interviews of health, environmental, training, and employment facilities.
- **Workshop.** Observations and interviews with officers related to material handling, work procedures, OHS, wages and environmental management.
- **Hazardous Waste Temporary Storage.** Observations and interviews with officers related to material handling, work procedures, OHS, wages and environmental management.
- **Rinse House Division 5.** Observations related to the management of agrochemical materials and waste, MSDS, emergency response facilities and types of pesticides used.
- **Employee Housing Division 5.** Observation of the availability of infrastructure such as employee housing facilities, clean water facilities, educational facilities, religious facilities, health facilities and sports facilities.
- **Pesticide mixing area.** Observation related pesticide mixing area, PPE storage, safety aspect.
- **Landfill Block 36-51 Division 2.** Observations related to domestic waste management.
- **Daycare.** Observations and interviews with workers related to labor and OHS aspects.

Plasma (Division 2, 3 and 4)

- **Block 39-36 Division 3 (HGU Pole No. PLS64).** Observation the conditions and position of legal boundary.
- **Block 39-33 Division 2 (HGU Pole No. PLS62).** Observation the conditions and position of legal boundary.
- **Block 42-30 Division 2 (HCV – Forest Conservation).** Observation of HCV management

- **Landfill Block 39-25 Division 2.** Observations related to domestic waste management.
- **Daycare Division 2.** Observations and interviews with workers related to labor and OHS aspects.
- **Fertilizer Warehouse Division 3.** Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used.
- **Agrochemicals Warehouse Division 3.** Observation related to management of oil and agrochemical material and waste, MSDS, emergency response facilities and the types of pesticides used.
- **Pesticide mixing area Division 3.** Observation related pesticide mixing area, PPE storage, safety aspect.
- **Rinse House Division 3.** Observations related to the management of agrochemical materials and waste, MSDS, emergency response facilities and types of pesticides used.
- **Housing Area Division 3.** Observation of the availability of infrastructure such as employee housing facilities, clean water facilities, and electricity facilities.
- **Public Toilet Division 3.** Observation of the availability of infrastructure such as employee housing facilities, clean water facilities, and environmental aspect.
- **Fertilization, Block 41.50 Division 3.** Field observations and interviews related to technical work, OHS aspects, employment, social, and environment.
- **Harvest, Block 41.47 Division 3.** Field observations and interviews related to technical work, OHS aspects, employment, social, and environment.
- **Fire Tower, Block 39.36 Division 3.** Field observations regarding the condition of the Fire Tower.
- **Fertilizer Warehouse Division 4.** Observation related to management of agrochemical material and waste, MSDS, emergency response facilities and the types of fertilizer used.
- **Agrochemicals Warehouse Division 4.** Observation related to management of oil and agrochemical material and waste, MSDS, emergency response facilities and the types of pesticides used.
- **Pesticide mixing area Division 4.** Observation related pesticide mixing area, PPE storage, safety aspect.
- **Rinse House Division 4.** Observations related to the management of agrochemical materials and waste, MSDS, emergency response facilities and types of pesticides used.
- **Housing Area Division 4.** Observation of the availability of infrastructure such as employee housing facilities, clean water facilities, and electricity facilities.
- **Public Toilet Division 4.** Observation of the availability of infrastructure such as employee housing facilities, clean water facilities, and environmental aspect.

2.3 Stakeholder Consultation and Stakeholders Contacted

2.3.1 Summary of stakeholder consultation process.

ASA-1

Summary of stakeholder consultation process for PT Bio Inti Agrindo was held by:

- Public Notification on website on RSPO and MUTU Website on 11 August 2022.
- Public consultation with NGOs (by email) such as WWF, WALHI, AMAN, and Sawit Watch on 15 August 2022.
- Public consultation meeting with government institution on 30 August 2022.
- Public consultation meeting with communities and previous land owners on 30 August 2022.
- Public consultation meeting with internal stakeholders and contractors on 30 August 2022.

Numbers of input from stakeholders were clarified by PT Bio Inti Agrindo.

2.3.2 Stakeholder contacted

Please find appendix 1

2.4 Determining Next Assessment

The next visit (ASA-2) will be conducted eight (9) months to twelve (12) months 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 Palm Oil Mill 2 – PT Bio Inti Agrindo operation consisting of one (1) mill and three (3) oil palm estates.

During the assessment, there were five (5) Nonconformities were assigned against Major Compliance Indicators; five (5) nonconformities were assigned against Minor Compliance Indicators; and no nonconformance against supply chain requirement for CPO mill and two (2) opportunity for improvement were identified.

Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5. The company has already prepared and implemented the corrective actions that had been reviewed and accepted by Auditors in form of documentation evidences e.g. (document record/photographic). Those corrective actions taken that consist of five (5) Major non-conformities and five (5) Minor non-conformities had been closed out shall be verified during next assessment.

MUTUAGUNG LESTARI found that POM 2 – PT Bio Inti Agrindo complied with the requirements of **Indonesia National Interpretation of Principles and Criteria for Sustainable Palm Oil Production 2018, endorsed on 20th April 2020 and RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020.**

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	Unit of certification showed SOP of information handling (SOP/DCO/01) validated on 20 May 2022 which explains the types of documents which are publicly accessible such as company's policies, land certificates, OHS plans, social impact plans and assessments, HCV documentation, etc. These documents can be accessed by sending a request to the management through letters, e-mail, telephone, and mailbox. Besides, UoC also provided their document publicly accessible by publishing company's policy at their website (e.g: human rights policy) and reporting their mandatory report to related stakeholders (e.g: mandatory manpower report to manpower agency).
1.1.2	The company can show records of providing information to relevant agencies in the form of routine reports, for example: Plantation Legality <ul style="list-style-type: none"> Plantation progress report (<i>LPUP</i>) of PT Bio Inti Agrindo period of Semester I of 2022 has been sent to Plantation Agency of Merauke District on 29 July 2022. HGU utilization report of PT Bio Inti Agrindo for the period of 2022 has been sent to Land Agency of Merauke District on 30 August 2022. Environmental Aspects <ul style="list-style-type: none"> The report on the implementation of the Environmental Management and Monitoring Plan for semester 2 of 2021 has been reported to the Merauke Regency Environmental Service on January 12, 2022. The report on the implementation of the Environmental Management and Monitoring Plan for semester 1 of 2022 has been

reported to the Merauke Regency Environmental Service on 18 July 2022.

- The report on the management of hazardous and toxic waste for the third quarter of 2021 has been reported to the Merauke Regency Environmental Service on October 5, 2021.
- The report on the management of hazardous and toxic waste for the fourth quarter of 2021 has been reported to the Merauke Regency Environmental Service on January 5, 2022.
- The report on the management of hazardous and toxic waste for the first quarter of 2022 has been reported to the Merauke Regency Environmental Service on April 5, 2022.
- The report on the management of hazardous and toxic waste for the second quarter of 2022 has been reported to the Merauke Regency Environmental Service on 5 July 2021.
- The Quarter 3 2021 POME Monitoring Report has been reported to the Merauke Regency Environmental Service on October 5, 2021.
- The POME Monitoring Report Quarter 4 2021 has been reported to the Merauke Regency Environment Agency on January 5, 2022.
- The POME Monitoring Report for Quarter 1 of 2022 has been reported to the Merauke Regency Environment Agency on April 5, 2022.
- The POME Monitoring Report for Quarter 2 of 2022 has been reported to the Merauke Regency Environment Agency on 5 July 2022.

BMP's and OHS Aspect

- LKUP (Agricultural Business Development Report) Semester 2 of 2021 to the Department of Food Crops, Horticulture, and Plantation of Merauke Regency on 13 May 2022.
- LKUP (Report on Agricultural Business Development) for Semester 1 of 2022 to the Department of Food Crops, Horticulture, and Plantation of Merauke Regency on 29 July 2022.
- OHS Committee Report 4th Quarter 2021 to the UPTD Manpower Supervisory Center for the Merauke Regency Regional Workforce on 07 February 2022
- OHS Committee Report 1st Quarter 2022 to the UPTD Manpower Supervisory Center for the Merauke Regency Regional Workforce on 17 May 2022
- Fire and forest fire control report to BKSDA Region 1 Merauke dated 07 February 2022.
- Fire and forest fire control report to the Ministry of Environment of Merauke Regency on 07 February 2022.
- Fire and forest fire control report to the Merauke Regency Food Crops, Horticulture and Plantation Service dated 07 February 2022.

UoC also showed the mandatory report submitted related to worker welfare in accordance with its period, for example: Reporting of Employment Report for PT Bio Inti Agrindo via online in 2021 on 8 September 2021 and must be reporting back on 8 September 2022.

Based on the document review, all documents and information which are publicly accessible (mentioned in 1.1.1) are provided in Bahasa and understandable by each stakeholder.

1.1.3

Unit of certification showed SOP of information handling (SOP/DCO/01) validated on 20 May 2022 and work instruction of communication handling (IK/DOC/01) validated on 17 December 2019 which explained the PIC of handling information, publicly accessible documents, the flow of handling information requests, and the maximum time limit of responding to the information request which is 21 days since the date of information request received.

UoC had recorded every requested information on a logbook of incoming and outgoing letters. Based on document verification, it was found that during 2020-2022 all incoming letters are requests for funds and the company has responded to the fund request. UoC only showed outgoing letters which are the company's report to each stakeholder according to its period, not as the respond to incoming letters.

Based on the interview with villagers, they have understood mechanism of communication and consultation. Normally, headman of the village, indigenous community, and local communities would send a letter as a form of communication.

1.1.4

UoC also showed the record of the socialization regarding the SOP mentioned in 1.1.1 on 17 July 2022 attended by every stakeholder such as: contractor workers, smallholder workers, and workers. In addition, based on the interviews with the villagers, labor union and gender committee, it is known that they had a good understanding of communication and consultation procedures.

1.1.5

UoC showed the current list of stakeholders which informed the internal and external stakeholders updated in August 2022. The stakeholders include the government agencies, heads of the community, cooperatives, local suppliers, contractors, gender committee, and labor union organizations. In the current list of stakeholders, it was also explained the names, agencies/positions, addresses, categories and contact person numbers.

During the assessment, auditor has verified the list of stakeholder by calling the contact person randomly to ensure the validity of its contact person put in the list of stakeholder.

Status: Comply

1.2

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

1.2.1

Unit of certification had a policy concerning on code of integrity and ethical behavior in all operational activities and transactions. This policy stated in the Directors Decree No. BIA/DIR/01/171221 validated by the President Director on 22 December 2017. It's explained that, the group committed to apply fair business practices, prohibit all forms of corruption, bribery and fraud in the use of funds and resources, and provide business information in accordance with applicable law and acceptable industry practices.

UoC's code of ethics had been socialized to the workers, smallholder workers and contractors, for example:

- POM 2 had carried out socialization on 28 July 2022 attended by 44 workers and contractor workers.
- Estate C in Division 4 had carried out socialization on 2 March 2022 attended by all workers in division 4.

This policy has been implemented by the company in all business operations and transactions including recruitment and employment contracts. Code of ethics (anti-corruption and anti-bribery) are stated in every work agreement letter of third parties (contractors) and workers. Based on the interview with workers and contractor workers, it's known that they had a good understanding towards the code of ethics policy.

1.2.2

A comprehensive system for monitoring compliance and implementation of ethical business policies and practices was carried out through the internal audit. UoC also showed the mechanism in implementing UoC's policy as stated on the agreement that the parties have to be fulfil the existing regulation such as do not employ any child labor, prohibit any corruptions and frauds, and disallowance of forced labor.

Based on the interviews with workers in mill and estate, they worked in the company wasn't through any agent or labor supplier and there were no any fees during recruitment.

UoC also showed some SOPs related to monitor the compliance and implementation of ethical business practices, here as follows:

- SOP of recruitment (SOP/HRD/01) validated on 24 March 2022 by the President Director and Collective Labor Agreement of 2021 to 2023 which stated that there was no cost in recruitment process. The company had guaranteed the cost of recruitment if there were any migrant worker.
- SOP of handling grievance and dissatisfaction (No. SOP/SOS/04) validated on 20 May 2022 which stated that the company guaranteed the freedom of speech by keeping the identity of the employee confidentially.

Based on the management review and internal audit document, there were no violation against the UoC's ethical codes.

Status: Comply

PRINCIPLE #2 OPERATE LEGALLY AND RESPECT RIGHTS

2.1

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

2.1.1

The company has list of regulations of 2022 that includes local regulations and national regulation updated annually. List of laws/regulations listed has covers several aspects such as land permit and legality, manpower, occupational health and safety, best management practices and environment. Some examples of regulations compliance that have been done such as:

Land legality

Plantation Business License based on the Decree of the Head of the Office of Investment and One Stop Services of the Province of Papua No. 12/SK.IUP/KS/Perubahan/2020 concerning Plantation Business Permit Changes in the Name of PT Bio Inti Agrindo issued on 27 October 2020. Based on the permit, the area of the company that received the business permit was 34,194.52 Ha and PKS with a capacity of 210- ton FFB/Hour.

The company has complied with several legal compliances in the environmental field, for example:

- The company already has AMDAL Addendum Documents (ANDAL, RKL, and RPL) Type B Plantation and Palm Oil Processing Mill activities with an area of 34,194.52 Ha and a factory capacity of 270 tons of FFB/hour which has received a recommendation from the AMDAL Assessment Commission of the Regency Environment Agency Merauke with Number 660/32 on July 27, 2021. In addition, the company has also obtained Environmental Feasibility in accordance with the Decree of the Head of the Investment Service and One Stop Integrated Service of Merauke Regency Number 663/03/SKKL/Year 2021 on July 29, 2021.
- Statement of Fulfillment of the Commitment of PT Bio Inti Agrindo (POM 2) from the Merauke Regency One Stop Service and Investment Office with Number 660/03/IPL-B3/XII/2020 on December 8, 2020 regarding the permit for storing hazardous waste.
- Permit for Storage of Hazardous and Toxic Waste Estate B in accordance with the Decree of the Head of the Merauke Regency One Stop Service and Investment Service Number 06/IPL/VII/ 2018 on 11 July 2018 with a validity period of 5 years.
- Permit for Storage of Hazardous and Toxic Waste Estate C in accordance with the Decree of the Head of the Merauke Regency Investment and One Stop Service Office Number 04/IPL/IV/ 2018 on 27 April 2018 with a validity period of 5 years.
- POM 2 Water Resources Concession Permit in accordance with the Decree of the Minister of Public Works and Public Housing Number 576/KPTS/M/2021 on 10 May 2021 with a validity period of 5 years.
- Land Application Permission for POM 2:
 - a) Letter No. 660/56/DLH/2000 dated January 16, 2020 from DLH Merauke Regency to the Management of PT BIA regarding Approval for the Study of Wastewater Utilization for Land Application (LA). This letter is a follow-up to PT BIA's letter number PT BIA-P191120K, dated November 20, 2019 regarding the application for an assessment of the utilization of PT BIA's POM wastewater and the disposition of the Merauke Regent on January 16, 2020.
 - b) Decree of the Head of the Environmental Service Number 810/285, dated June 9, 2020 concerning Approval of the Proposed Study of Utilization of Palm Oil Industrial Wastewater on Soil at PT BIA's Palm Oil Plantation Estate B covering an area of 180 Ha Merauke Regency in 2020. The letter explained that approval was given to proposed study of waste water utilization in Estate B covering an area of 180 ha with an installed factory capacity of 60 tons of FFB/hour and the process of flowing LA in pond no.5.
 - c) Letter Number 660/429/DLH/VII/2021 dated July 30, 2021 from DLH Merauke Regency regarding Technical Approval for Fulfillment of PT BIA Wastewater Quality Standards to the Management of PT BIA.

In the ASA 1 assessment carried out, the company expanded the waste water utilization area for both POM 1 and POM 2 by collaborating with consultants PT Mitra Hijau Indonesia in the preparation of technical studies and the management of Pertek and SLO. Currently, the Draft Technical Study on the Fulfillment of Wastewater Quality Standards (Application to Soil) has been uploaded to the One Stop Service of the Ministry of Environment and Forestry online on August 13, 2022. However, the progress of the completion of permits related to the expansion of the wastewater application area has not been completed. The company has the opportunity to ensure that the progress of the completion of the permit for the expansion of wastewater applications is positive. (OFI)

BMP's and OHS Aspect

- Based on field observations at POM 2, Estate B, Estate C, and Division 3 Plasma, as well as interviews with workers, it is known that plantation and mill management has implemented some compliance with Indonesian laws and regulations. These revealed that The CH has carried out planting without burning, has implemented soil conservation in border areas by prohibiting spray markings in border areas that continue to be planted and only managing harvest paths manually, and seeds planted using certified seeds. Based on interview revealed that The CH did not use paraquat in weed control, but used herbicides registered with the Director General of Fertilizers and Pesticides.

- The CH has a factory machinery permit and periodic inspections carried out by the competent authority, such as license deed no. 238/PKTN.4.10/KPP/DL/11/2021 for Weighbridge on POM 1. The last inspection will be on 18 November 2021 and the re-examination will be on 18 November 2022.
- The CH has dutifully reported its operational activities to relevant government agencies and institutions, as discussed in indicator 1.1.2.
- The CH has identified the need for OHS licenses for machine and heavy equipment operators both at POM and on estate. The company has a training program for the fulfillment of OHS licenses in 2022, and has been shown OHS licenses for several operators which will be implemented in semester 1 of 2022. Management representatives explained that the fulfillment of OHS licenses is planned to be completed by 2024. Based on this, The CH is encouraged to ensure all machine and heavy equipment operators have obtained the appropriate OHS license. This becomes **OFI** for the company.

Manpower Aspect:

- UoC has implemented a minimum wage and the fulfillment of overtime wages
- UoC already has and implements a pay scale structure
- There was no illegal labor, underage labor and forced labor systems.
- UoC committed to not employ contract workers in permanent or core job such as harvesting.

2.1.2

Procedure of legal requirement which presented in document SOP / DCO / 06 dated January 30, 2020, mentioned that sustainability officer has responsibility to arranged and monitored legal related laws and/or regulation. The procedure mentioned that in order to monitor and update of laws and/or regulations, the sustainability officer required to actively check and make coordination with Government Agencies or Institutions. Internal audit of regulations compliance is conducted annually as example on 29-30 June 2022. Regarding the evidence of evaluation of legal compliance from contractors collaborating with the company, is explained in more detail in indikator 2.2.2

2.1.3

Procedure of legal boundary stakes monitoring and maintenance is presented in document No. SOC/KBN/25, revision 01 dated 17 March 2020. Procedure mentioned that maintenance was carried out by officer appointed by Assistant. Monitoring the boundaries of the HGU is done every 4 months.

The company shows the HGU stake monitoring document which is carried out every 4 months. The last HGU stake monitoring was carried out in June 2022 at Estate A and Plasma. The report on the inspection and maintenance of the boundary stakes has provided complete information regarding the number of stakes, the state of the stakes, the location of the stakes, the coordinates of the stakes and corrective actions as well as the target time for repairs if there are damaged or missing stakes. In the monitoring report, it is known that all HGU stakes are available.

Based on field observations to several samples of HGU stakes determined by the auditors, namely Estate B (Stakes No. 110, 107, 106, 90 and 89), Estate C (Stakes No. 225, 224 and 223) and Plasma (Stakes No. PLS62 and PLS64), it is concluded that all HGU stakes are in place according to their coordinates and are in good condition. Land boundaries with outsiders are clear, such as a large boundary road and trench that borders the HGU area. There is no indication of land use outside the HGU.

Status: Comply

2.2

All contractors providing operational service and supplying labour, and Fresh Fruit Bunch (FFB), comply with relevant legal requirements.

2.2.1

In monitoring the existence of contractors for plantation and mill activities, UoC had well-documented the list of contractors, type of business, contact persons, work agreements, and ensuring other matters related to compliance with laws and regulations in Indonesia. The contractors collaborate in the activities of building construction in estate and FFB transport in estate, here as follows:

- Estate B: In cooperation with 3 contractors in building construction, namely CV Bone Putra, CV Doa Ibu, and CV Kridaya Tunggal.
- Estate B: In cooperation with 9 contractors in FFB transportation, namely CV Ilham Mandiri, CV Ananda Putra Cahaya, CV Falah Inti Papua, CV Raja Basa Pratama, CV HGM Mandiri, CV Faza Interior, CV Adly Tawwab Mandiri, CV Makmur Indah, and CV Krida Tridaya Tunggal.

- Estate C: In cooperation with 4 contractors in building construction, namely CV CV Abdul Mandiri, CV Arif Risky Jaya, CV Indah Wira Buana, CV Marannu Fajar, and CV Mitchell Mandiri.
- Estate C: In cooperation with 12 contractors in FFB transportation, for example: CV Berkah Rhisky Abadi, CV Bhuyamca Jayamahe, CV Berkah Cahaya Digoel, dan CV Mitchel Mandiri.

Based on the interview with the management representatives, it's known that for CPO transport activities, UoC already has their own vehicle for CPO transporting.

In managing the contractor, the certification unit has a copy of the collaboration agreement in each unit. For example, the agreement between two parties, such as:

- Work Agreement of CV. Bone Putra (No. 2022/05/KK/BIA/07-06) for cooperating in building construction dated on 7 June 2022 to 7 September 2022.
- Work Agreement of CV Berkah Cahaya Digoel (No. 01/BIA/SPK/AGR/2022-A) for cooperating in FFB dated on 2 January 2022 to 16 September 2022 which is valid for three months.

The contractor list has been in-line with the information in stakeholder list. Auditor has verified by calling the contractor by the contact number put in stakeholder list. The explanation above can be concluded that the UoC has managed and documented the list of contractors along with its supporting documents.

2.2.2

UoC showed that there were several separate clauses on the work agreement between the company and the contractor related to fulfilling legal obligations in Indonesia. Some of these obligations are related to the registration of workers' health and social security insurance, the provision of minimum wages, the obligation to use PPE, other permits such as tax payment, vehicle licenses (STNK), driver license (SIM) and others. To ensure the compliance with these clauses, UoC always requests the requirements for the completeness before the contractor does work.

In addition, UoC has carried out an evaluation of each contractor to see the performance of the contractors and the compliance of the contractors to the existing regulation, for example the evaluation of CV Maju Jaya in 2021. There were several important indicators in the evaluation including administration documents, punctuality, compliance with manpower regulations and laws, compliance with environmental regulations and laws, and compliance with the health safe and security regulation, and compliance with UoC's procedure and work instruction.

Based on the interviews with contractor, contractor workers, and documents verification, it's revealed that workers had received wages above the minimum wage and were registered in the BPJS program. For example:

- Proof of payment of wages period of July 2022 for HGM Mandiri contractor workers in Estate B on behalf of DSN, DL, and TH (initial) who received wages above the minimum wage.
- Proof of payment of wages period of July 2022 for Ilham Mandiri contractor workers in Estate B on behalf of JMD and YT (initial) who received wages above the minimum wage.
- BPJS *Ketenagakerjaan* (Social Security Insurance) payments for CV HGM Mandiri contractor workers in Estate A for 8 contractor workers, have been fulfilled and the last proof of payment is on 15 August 2022 for period of August 2022.
- BPJS *Kesehatan* (Health Insurance) payments for three contractor workers in CV HGM Mandiri, have been fulfilled and the last proof of payment is on 8 August 2022 for period of August 2022. The rest contractor workers are registered in health insurance from government program (PBI).

2.2.3

UoC showed that on each work agreement between the unit of certification and the contractor, there were clauses related to fulfilling legal obligations in Indonesia as one of the obligations that must be fulfilled by the contractors. Some of these obligations are related to UoC's commitment against forced labour, underage worker, and not to employ workers from human trafficking (stated in 9th clause).

To ensure compliance with these clauses, the company always requests the requirements for the completeness before the contractor does work.

Based on the document review and the field observation, it revealed that there were no workers under the age of 18 and the work

provided was in accordance with the agreement when the initial worker worked. Based on the interviews with contractor, contractor workers, and documents verification, it revealed that they had a good understanding related to the minimum age of worker, the prohibition of forced labor and the human trafficking.		
	Status: Comply	
2.3		
All FFB supplies from outside of the unit of certification are from legal sources.		
2.3.1		
Based on document verification, it is known that the company received FFB directly from Estate A, Estate B, Estate C, Plasma, and PT Internusa Jaya Sejahtera. For Estate A, Estate B, Estate C, and Plasma are Certified Areas. The company can show the PT Internusa Jaya Sejahtera license. The permits for PT Internusa Jaya Sejahtera are as follows:		
<ul style="list-style-type: none"> HGU No 24/HGU/KEM-ATR/BPN/2018 dated 19 March 2018. Plantation Business License Number 04/SK.IUP/PKS/2014 dated December 15, 2014 with a net area of 18,587.05 ha. Coordinate point 7°16'42" S and 140°46'33"E 		
2.3.2		
Based on document verification, it is known that the company only receives FFB directly and does not receive FFB indirectly, such as collectors, agents, or independent farmers.		
	Status: Comply	
PRINCIPLE #3 OPTIMISE PRODUCTIVITY, EFFICIENCY, POSITIVE IMPACTS AND RESILIENCE		
3.1		
There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.		
3.1.1		
The CH has a longterm production projection contained in the 2019-2030. The document contains the projected production, CPO prices, PK, CPO and PK Revenue, cost estates, mill costs, and profitability. The long-term plan is then elaborated in the form of an annual plan, a monthly work plan in each division for each activity. Every month an evaluation is carried out on the achievement of the specified budget.		
3.1.2		
Based on interviews with management representatives and the document review, the company does not have a replanting plan in the next 5 years due to the age of the plant in the operational area of the certified unit. The oldest age of the plant in the scope of certification this time is 8 years (2014 planting year). Based on field observations in Estate B, Estate C, and Plasma Division 3, there is no replanting activities were found.		
3.1.3		
Management reviews in POM and Estates are conducted monthly, quarterly or more often if there are things that need to be discussed. For example the management review conducted on 07 June 2022, which was attended by the President Director, Board of Directors, GM, and relevant Managers. Minutes of meetings are available and there has been a response from the President Director of the company. Some of the things discussed include audit results, incident evaluation, and continual improvement.		
	Status: Comply	
3.2		
The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.		
3.2.1		
The company has taken actions for continuous improvement in environmental aspects, for example:		
<ul style="list-style-type: none"> Waste management and monitoring through WWTP Management, effluent quality testing and reporting to the Merauke Regency Environmental Service. Air quality management and monitoring through road maintenance, air quality testing and reporting to the Merauke Regency Environmental Service. Management and monitoring of groundwater through testing ground water quality and reporting it to the Merauke Regency 		

Environment.

- Hazardous waste management through the Storage of Hazardous and Toxic Waste and Waste Management and Monitoring of Hazardous and Toxic Materials.
- Greenhouse Gas (GHG) Management. Implement a zero-burning policy, utilization of EFB, shells and fiber as renewable energy, regular engine maintenance, and regular emission quality tests.

BMP and OHS Aspect

- Implementation of Harvest Inspection for aspects of harvest quality and FFB quality on a regular basis by the estate supervisory team.
- The use of drones as one of the fire monitoring tools by the fire management team.
- Implementation of the Internal Estate Audit on a regular basis to check the implementation of BPM procedures and compliance with company regulations.
- The company no longer uses pesticides with the active ingredient paraquat.

3.2.2

The company already has an annual report document using the RSPO metric template format that has been provided to the auditor team at the time of the assessment. The summary in the report, for example, is as follows:

- Name of RSPO Member: PT Bio Inti Agrindo
- RSPO Membership Number: 1-0257-18-000-00
- Name of Certified Audit: PT Bio Inti Agrindo
- Name of Certification Body: PT Mutu Agung Lestari
- RSPO Palm Trace ID Number: RSPO_PO1000010735
- Number of Mill: 1
- Number of Certified Estate: 3
- HCV Area: 6,387.26 Ha.

Status: Comply

3.3

Operating procedures are appropriately documented, consistently implemented and monitored.

3.3.1

The CH has BMP SOPs for both estates and mills that have not changed from the previous audit. The procedure describes key processes such as harvesting, transportation, fertilization, IPM, GAP, supply chain requirements for mills, processing at mills, and delivery of CPO and PK. Examples of SOP document numbers owned by a company are as follows:

SOP for Land Opening and Preparation (Code: SOP/KBN/01) dated 24 December 2017 Revision 00.

- Nursery SOP with Code: SOP/KBN/02 effective date 24 December 2017 Revision 00
- Planting SOP (Code: SOP/KBN/04) dated 24 December 2017 Revision 00.
- SOP for receiving and checking / sorting FFB activities (Code: SOP/POM/04) dated 24 December 2017 Revision 00.
- Processing SOP (Code: SOP/POM /05) December 24, 2017.
- And others.

The procedure that is owned by the company has covered all the main process activities from land clearing up to transporting FFB and for POM starting from receiving fruit to despatch CPO.

3.3.2

The CH has a system that ensures consistency in the implementation of its SOPs that have not changed from the previous audit. Such as the Checking or Inspection of Work Quality (Internal Audit of Plant and Plant), ISPO and RSPO Internal Audit, which checks whether the procedures in the company have been implemented by the audited unit and the Financial Audit carried out by external parties to ensure the use or costs used are in accordance with the rules set by the company. The CH also has an SOP on Internal Audit (SOP/DCO/04) revision 1, at April 09, 2022 which also explains the period of internal audits conducted twice in a year.

The CH has shown records related to the socialization of procedures to third parties at POM 2 on June 27, 2022, for FFB loading Contractor workers. Based on interviews with contractors, it is known that the contractors already know the relevant work procedures and OHS aspects.

3.3.3

The CH shows the recording of the Internal Audit Estate visit 1 in 2022 which will be held from 11-27 July 2022. The discussions include IPM, Partenokarpi, fertilization in 2022, and production.

The CH also shows the results of internal RSPO audits for POM 2, Estate B, Estate C, and Plasma on 02 - 08 July 2022. All aspects related to the RSPO have been examined, and presented to management for evaluation and improvement planning.

For audits of public accountants that are conducted regularly, the Financial Statements ending December 31, 2021 have been audited. The public audit was conducted by Purwantoro, Sungkoro, & Surya who are members of the EY Audit Public Accountant. The independent auditor's report is listed in number 00559/2.1032/AU.1/01/1561-2/1/IV/2022 dated April 13, 2022, with the opinion on the accompanying financial statements presenting fairly, in all material respects. As well as financial performance and cash flow, in accordance with financial accounting standards in Indonesia.

For contractors, periodic assessments have been carried out. This has been discussed in indicator 2.2.2. The results of field observations at PKS 2, it was found that the FFB transport driver who came from the contractor had used a safety helmet and shoes when delivering FFB to POM 2.

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

The company has carried out an independent and participatory environmental and social impact assessment by involving the stakeholders listed in several documents, namely:

Environmental Aspect

- AMDAL documents (ANDAL, RKL, and RPL) for the construction of PT Bio Inti Agrindo Palm Oil Plantation and Processing Factory in Merauke Regency, Papua Province with an area of 39,900 ha and a factory capacity of 120 tons of FFB/hour. The document was approved based on the Decree of the Head of the Environmental Impact Management Agency for Mining and Energy Merauke Regency No. 660/26/2008 was stipulated on August 4, 2008. The company also has an Environmental Feasibility Permit for the Development and Plantation and Palm Oil Processing Factory obtained through Merauke Regent Decree No. 660/26/2008. 88 of 2009.
- In 2018, the company carried out an AMDAL Addendum due to plans to increase the number and capacity of factories in Estate B (POM 2) with a capacity of 60 tons of FFB/hour and Estate C (POM 3) with a capacity of 90 tons of FFB/hour in Ullin District, Merauke Regency, Papua Province. The document has obtained an environmental permit in accordance with the Decree of the Merauke Regency Investment and One Stop Service Office Number 663/05/ 2018 on December 5, 2018.
- In 2021, the company made an AMDAL addendum due to the addition of factory capacity in Estate B (POM 2) from 60 Ton FFB/Hour to 90 Ton FFB/Hour, in Estate C (POM 3) from 90 Ton FFB/Hour to 120 Ton FFB /hour, and the addition of several activities that have not been covered in the previous AMDAL document, namely increasing the area for wastewater application, increasing the number of WWTP pools, Utilizing solid waste in the form of EFB, Management of hazardous and toxic waste from health service facilities, increasing domestic wastewater treatment, installation of solar cells, and utilization of methane gas from the WWTP pool for biogas fuel. The documents are Addendum AMDAL Type B Plantation activities and Palm Oil Processing Factory with an area of 34,194.52 hectares and a factory capacity of 270 tons of FFB/hour (POM 1 capacity of 60 tons of FFB/hour, POM 2 capacity of 90 tons of FFB/hour, and POM 3 capacity 120 Ton FFB/Hour). The document has received a recommendation from the AMDAL Assessment Commission of the Merauke Regency Environmental Service Number 660/32 on 27 July 2021. In addition, the company has also obtained Environmental Feasibility in accordance with the Decree of the Head of the Investment and Public Service Agency.

Social Aspect

The company already has a Social Impact Assessment Report (SIA) of PT. Bio Inti Agrindo conducted in January 2017 to February 2017 conducted by Aksenta. The scope of the study was carried out in and around the operational area of BIA and its partnership plantations, covering areas of villages in and around the plantation as well as plantations, mills, HGU areas or plantation/company

permits covering Merauke Regency, Ulilin District.

During the last three years (2017 to 2019) the Social Impact Assessment document issued by Aksenta was used as the basis for planning and managing existing social impacts. In year 3, at the end of 2019, the company's management evaluated the results of the social impact study conducted by Aksenta. Based on the results of the evaluation of the company's management that along with the development of the era and the opening of access for the community with the presence of the company, it is necessary to re-study existing social impacts, so that from January to May 2020 the company conducts a social impact study by an independent assessment team, namely Ecology Consultant. From the results of the Social Impact Study conducted by Ekologika Consultant, several positive and negative impacts emerged, from the existing negative impacts it resulted in negative impacts that had a high risk of making the community vulnerable. Further recommendations for managing existing impacts, both positive and negative, have also been included in the results of the social impact assessment. Social impact assessment is carried out using the Participatory Rapid Rural Assessment (PRRA) method, namely by taking an approach by positioning the community as subjects who know the conditions and problems in their area, providing "space" to people from various social statuses and interests to express their aspirations. Is a medium of learning and community empowerment about conditions and problems in their area.

Based on document verification, it is known that the social and environmental impact assessment has been carried out independently and participatively by involving affected stakeholders, including impact assessments from smallholder schemes.

The results of field observations during the audit activity show that all of the company's operational activities have been included in the company's environmental documents.

Based on interviews with surrounding villages, namely Selil and Mandekman, it is known that the social impacts of the company's existence include partnerships with business actors to provide business opportunities to the community, CSR, job opportunities, etc. These social impacts have also been identified in the SIA Document, Environmental Document, as well as the company's social impact management plan.

Based on document verification, it is known that the scope of the social impact assessment has covered all villages, farmers, and has involved internal workers.

3.4.2

The company has a plan for environmental and social management and monitoring, namely:

Environmental Aspect

The environmental management and monitoring plan is in accordance with the 2009, 2018 and 2021 AMDAL documents, namely:

AMDAL 2021

Plant Operation Stage A

- Soil erosion
- Decline in surface water quality
- Changes in flora and fauna
- Public perception and positive attitude
- Changes in disease pattern

Plant Operation Stage B

- Decreasing air quality
- Noise enhancement
- Occurrence of odor
- Liquid waste generation
- Decline in surface water quality
- Disturbance of Aquatic Biota
- Decreasing Environmental Sanitation
- The emergence of negative public perceptions and attitudes

FFB, CPO and Kernel Transportation

- Air Quality Decline
- Changes in disease pattern

AMDAL 2018

- Monitoring the rate of soil erosion.
- Air quality and noise monitoring.
- Hazardous Waste Management.
- Monitoring Social, economic and cultural components.
- Monitoring the quality of surface water (well and river water).
- Application of effluent to the ground.
- Biological component (monitoring of flora and fauna).
- Social component (public perception).
- Community plantations (plasma).

AMDAL 2009

- Erosion/sedimentation
- Water quality
- Vegetation Structure
- Wildlife protected
- Social unrest
- Public health

Social Aspect

The company already has a social management plan for the 2020-2022 period based on the recommendations from the social impact assessment conducted in 2020 and the results of the 2017-2019 social impact management review. The social impact assessment and review has been carried out in a participatory manner by involving the surrounding community, plasma farmers who have joined the CPCL, and employees. The social impact management plan for the 2020-2022 period includes:

- Strengthening communication and social relations with clans of customary land owners and communities around the company.
- The company's participation in improving human resources in the company's environment.
- Recruitment and management of local workforce
- Development of CSR programs to help increase the economic independence of the community.
- Development of CSR programs to participate in improving the basic facilities of clans who own customary land, which provides convenience for companies and the community.
- Community plantation development.

The SIA management plan which was prepared based on the results of consultations with stakeholders such as local communities, plasma farmers, and employees has covered all of the company's operational activities. This is evidenced by the SIA management plan which contains the social impacts of the company's operations on the affected stakeholders.

Based on interviews with surrounding villages, it is known that the social impact of the existence of companies such as partnerships with efforts to provide scholarships and CSR. Both impacts have been covered in the SIA study document.

3.4.3

The Company has implemented environmental and social management and monitoring plans, namely:

Environmental Aspect

The company can show the implementation document of the environmental management and monitoring plan for semester 1 of 2022. Based on the results of the verification of the document, it is known that the implementation of environmental management and monitoring is in accordance with the directions of the environmental document it has. The reporting format has referred to KepmenLH No. 45 of 2005, which has evaluated trends, critical levels and compliance with all parameters that are managed and monitored. The report on the implementation of environmental management and monitoring in the first semester of 2022 was submitted to the Merauke Regency Environmental Service on July 18, 2022. In general, the results of environmental monitoring owned by the company are in accordance with environmental parameters such as river water quality testing, emission testing, etc.

Social Aspect

Based on the results of interviews and document verification, the following evidence was obtained:

- The company already has a Social Impact Assessment Report (SIA) of PT. Bio Inti Agrindo conducted in January 2017 to

February 2017 conducted by Aksenta. From this study, there are recommendations for social management and monitoring for 2017-2019 that will be carried out by the company.

- In 2020, the company re-assessed the social impact and reviewed the implementation of social management and monitoring for the period 2017-2019 which was carried out by Ekologika Consultant. From the results of these studies and reviews, there are recommendations for managing social impacts for 2020-2022. The recommendations for managing social impacts are as follows:
 1. Strengthening communication and social relations with the clans of customary land owners and the community around the company with the aim of good communication between the company and the clans of customary owners and the village community.
 2. Company participation in improving human resources within the Company in cooperation with third parties through scholarship policies.
 3. Recruitment and management of local workforce.
 4. Development of CSR programs to help increase the economic independence of the community. The activities are expected to be carried out by conducting a livelihood assessment that focuses on commodity development by the community, including vulnerable communities, women and youth.
 5. Development of CSR programs to participate in improving the basic facilities of clans who own customary land, which provides convenience for companies and the community. The activities are expected to identify needs based on community proposals.
 6. Development of community plantations.
- The company has carried out social impact management and social impact management reviews for the 2020-2022 period which is listed in the PT BIA Social Impact Management Monitoring Report for 2020-2022, but the implementation date is unknown and evidence of the implementation of the review was carried out in a participatory manner.
- Based on the results of interviews with external stakeholders such as representatives of the Mandob Sejahtera Cooperative, Ilsay Mandiri Cooperative, Kindiki Village, Sellil Village, Mahuze Kewam and Mahuze Milafo clans, it is known that there are several social issues that are developing, for example:
 1. Communication with the company is deemed ineffective because every complaint submitted has not been responded to by the company.
 2. Scholarships provided by the company received complaints and questions regarding the nominal scholarship provided by the company.
 3. The company's CSR program has not been based on the results of consultations and needs have not been identified with the community. This is because some of the CSR assistance provided by the company is deemed less targeted by the community.

Based on this explanation, the company has not been able to show evidence that the review of social impact management has been carried out in a participatory manner. **NCR No 2022.01 with Major Category.**

3.4.3	Status: NCR No 2022.01 with Major Category.
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3.5

A system for managing human resources is in place.

3.5.1

UoC had procedures related to recruitment, appraisal, promotion, remuneration, and termination of employment which are generally described in the Collective Labor Agreement period of 2021 to 2023 written in *Bahasa*. This CLA has been validated by the head of manpower agency of Merauke District.

Based on the document verification, CLA generally described these procedures as follows:

- Recruitment of workers is based on the company's needs.
- The minimum age of workers is 18 years old.
- Permanent works or core works are only for permanent workers (PKWTT).
- The workers who have been accepted will through three months of probation.
- Promotion of workers is based on needs, period of work, expertise, and assessment of workers/
- The company is authorized to carry out the placement, transfer, and promotion of workers by applicable regulations.

In addition, the procedures of employee recruitment, appraisal, promotion, and remuneration are explained specifically in several SOPs. These procedures have been documented and socialized to all workers and their representatives, here as follows:

- Procedure No. SOP/HRD/01 validated on 24 March 2022 concerning on Recruitment and Selection.
- Procedure No. SOP/HRD/05 validated on 24 March 2022 concerning on Worker's Appraisal.

Based on the interviews with workers (harvesters, pesticide sprayers, and mill operators), workers had a sufficient understanding of the procedures related to recruitment, promotion, and termination of employment. The types of workers exist in the company are permanent workers in probation and permanent workers. Workers explained that the recruitment process carried out by the company was in accordance with the terms according to ability, promotion is based on an assessment of the performance of each employee each year, and termination of employment can occur if the worker has committed a serious violation and other causes of termination as in existing government regulation. All labor procedures has been in accordance with the applicable regulation.

3.5.2

Unit of Certification documented all labor procedures that have been carried out properly, such as recruitment, promotion, performance appraisal, and termination. The following are some sample labor procedures that have been implemented and are well documented by certification unit, including:

- Recruitment document in accordance with the recruitment requirements such as employment request form, application letter, statement of police report, identity card (KTP), family identity card (KK), the result of medical check up, and work agreement letter. For example, a worker on behalf of SH (initial) who started working as a harvesting worker on 10 May 2022 with three months probation.
- Promotion documents such as management decree for worker's promotion No. BPHNL/SK-P/211019-C for a worker on behalf of TR (initial) who had a promotion based on worker's appraisal, from contract worker to permanent worker on 19 October 2021.

Based on the interviews with the Manpower Agency of Merauke, the company had been applied the existing labor procedures in accordance with the regulations. During 2021 to 2022, there were no significant issues related to manpower.

Status: Comply

3.6

An Occupational Health and Safety (H&S) plan is documented, effectively communicated and implemented.

3.6.1

In carrying out its operational activities, the company has established an OHS Policy which is signed by the President Director through the Decree of the Board of Directors No. BIA/DIR/23/170417 and ratified on 27 April 2017. The OHS policy has been socialized to all employees. For example, periodic socialization has been carried out in Division 1 Estate B on February 12, 2022 for all employees. In addition, to facilitate the socialization of the company's OHS policies, the OSH policies are posted on bulletin boards in every plantation and mill office.

In support of the above policy, the company has established several procedures related to OHS. In addition, the Company has also carried out Hazard Identification and Risk Control as stated in the HIRADC document.

Based on the review of the HIRADC document which has been in effect since January 2022, the risks and hazards of each activity are explained, for example:

- Heavy Equipment Operations with the risk of fractures. Control measures taken are not to ride or depend on heavy equipment.
- FFB transportation activities with the risk of fractures, abrasions, pinching, and death. Control measures taken are not to hold on to the tailgate and not to sit on the head of the truck.

Based on observations at Estate B, it is known that there are workers / helpers who ride / sit next to the Grader operator. Based on observations too, in the residential area of Estate C, it is known that there are workers riding excavators who are moving places by sitting in the bucket and next to the excavator boom / arm. Based on the results of observations at Estate B (when transporting FFB to the PKS) it was found that the loaders were sitting on a moving FFB truck.

The HIRADC also explains that the Rinse House Activities include storage of work tools and PPE as well as personal cleaning (bathing). However, the results of interviews with fertilizer workers in Block 41-50 Division 3 Plasma, it was found that the apron and rubber gloves were washed and stored at home. As explained by PIC Plasma, this is because the condition of the rinse house is not adequate.

Based on this evidence, there are company operational activities that have not been carried out in accordance with their HIRADC. This is a **2022.02 non-conformity**.

3.6.2

The CH conducts periodic management reviews, including those related to sustainability. This activity was last held on June 07, 2022, which was attended by President Directors, GM, and estate and mill managers PT BIA. Discussions carried out included Evaluation of PPE use violations, incidents, nonconformities, corrective actions, and continual improvement, audit results, consultation and participation of workers.

The CH has an OHS Committee in each unit which is responsible for the implementation of OHS aspects. One of the activities of the OHS Committee is to conduct monthly evaluations related to the implementation of OHS programs. For example, in the OHS Committee meeting on 13 April 2022 which was attended by 17 members from POM 1, POM 2, Estate A, Estate B, Estate C, and Plasma. Among them are discussing the results of the ISO 45001 audit, management review, application of procedures when an incident occurs, and employee competence.

3.6.1	Status: NCR No 2022.02 with Major Category
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3.7

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

3.7.1

Unit of certification had training identification and program for 2021-2022 in order to improve the competence and expertise of all workers including contractors. The company had identified the needs of competence standard and the proposed training for each worker including contractor worker, for example:

- Training of fire-fighting and first aid simulation for emergency team.
- Training of children care for daycare officer.
- Training of MSDS for warehouse officers.
- Training of pesticide application for pesticide application workers in estate.

3.7.2

UoC also showed that they had properly documented every training activity and socialization that had been carried out to all workers, contractors, smallholders, and related stakeholders. The following is an example of training/socialization documentation that had been carried out, for example:

- Training of pesticide application calibration in Division 2 of Estate B on 21 June 2022 which was attended by all pesticide application workers and foremans.
- Training of loose fruit calibration on 6 July 2022 which was attended by all harvesting workers in Division 2 of Estate B.

Based on field observations and interviews with workers (harvesters, maintenance workers, warehouse officers, and mill operators) and contractor workers, it is known that the company provides some training programs due to upgrade the worker's expertise and competence. All workers also showed their understanding of duties and responsibilities for each job quite well.

3.7.3

The unit of certification showed socialization about the supply chain to employees which was last conducted on 11-12 August 2022. The minutes explained the procedures for managing certified including the responsibilities for each of the personnel who handle products.

The results of interviews with Head of Administration, weighbridge operator in POM and FFB administration in Estate showed that workers have already known the duties and responsibilities of each in the implementation of SCCS in accordance with the procedure and have been able to explain well about the management of certified and uncertified products, especially regarding the origin of the FFB source.

Status: Comply

3.8

Supply Chain Requirements for Mills

3.8.1 and 3.8.2

Based on document verification, the Mill implements the MB Module, which is received both FFB from certified and uncertified sources. Verification of Mass Balance record, the Mill has been recorded well the separation of FFB and products (CPO and PK) from certified and uncertified sources.

3.8.3

Estimated certified product recorded in the last assessment report. The estimates of certified production for the next license period

describe at ASA-1 report (basic info 1.8.3), in reasonable amount taking into account the last year's production. The data are shown in the following table:

Products	Last Year Projected Certified Volume (MT)	Actual Certified Volume (August 2021 to July 2022) (MT)
FFB Certified (MT)	-	462,140.33
CSPO (MT)	-	97,020.60
CSPK (MT)	-	14,079.99

3.8.4

The Mill has registered as RSPO member under PT Bio Inti Agrindo (No. 1-0257-18-000-00) and also has been registered in IT platform palm trace RSPO <https://palmtrace.rspo.org/web/rspo/member-directory> which information as follows:

- Member Name: PT Bio Inti Agrindo_PKS 2
- License ID: CB124944
- Core Product: Palm Oil
- Member ID: RSPO_PO1000010731
- Type of Business: Oil Mill

3.8.5

RSPO Supply Chain SOP with document number SOP / PKS / 14 effective date 26 September 2020 revision 00. The scope of activities of the relevant elements and the production and distribution chain in question are Palm Oil Mill and Bulking. Applied to the Supply Chain Model Mass Balance (MB). With the aim to explain in general about the requirements regarding traceability and Mass Balance (MB) balance.

This procedure informs the duties and responsibilities of the Sustainability Department, Marketing Department, mill traceability, FFB traceability, use of palm trace, handling of non-conformities or complaints including training that includes training plans, target participants, training conducted once a year and training materials.

Unit management shows the procedure for Purchasing and Selling of FFB / CPO / PK with document number SOP / PKS / 13, effective date of September 25, 2020 revision of 00. SOP for purchasing and selling FFB / CPO / PK is prepared to regulate the entire process of buying and selling of Fresh Fruit Bunches (FFB), Crude Palm Oil (CPO), Palm Kernel (PK), so that it can run effectively and efficiently. As well as being a guideline and uniform implementation of the process of buying and selling FFB, CPO, PK.

Based on interviews in POM 2 note that the weightbridge operators understands the supply chain management system. It also known that training and refreshment (awareness) of supply chain management system were carried out annually.

3.8.6

The procedure for internal audit for SCCS mentioned in Quality Audit Procedure (No. SOP / DCO / 07 effective date May 30 2020). Based on that procedure internal audit carry out minimum one times a year. Based on document review, the company show the record evidence regarding internal audit of RSPO SCCS that conducted on 2-8 July 2022. Based on result of internal audit, there is 3 non conformity SSCS indicators and has been correction and complied with RSPO Supply Chain requirements for mills and the RSPO Rules on Market Communications and Claims.

Management Review of RSPO SCCS implementation conducted on 8 July 2022. The management review discussion has covered the input from internal audit result, correction and corrective action, process performa and product compliance, follow up of previous management review, and recommendation for improvement.

3.8.7

The mill has verified and documented the volumes of certified and non-certified FFBs received. Certified and non-certified FFB received period of 12 months before audit which is August 2021 – July 2022:

Month	FFB (ton)		Total
	Certified	Non-Certified	
August 2021	-	29,880.64	29,880.64
Sept 2021	31,208.42	-	31,208.42
Oct 2021	35,821.67	156.20	35,977.87
Nov 2021	44,110.00	-	44,110.00
Dec 2021	41,594.10	-	41,594.10
Jan 2022	46,413.50	-	46,413.50
Feb 2022	43,040.80	-	43,040.80
Mar 2022	48,262.76	-	48,262.76
Apr 2022	37,251.58	-	37,251.58
May 2022	32,903.66	-	32,903.66
June 2022	34,349.60	-	34,349.60
July 2022	37,377.24	-	37,377.24
Total	432,333.33	30,036.84	462,370.17

Estimated certified product recorded in the last assessment report. Actual certified produced has been verified during this assessment and not exceed the estimate. The data are shown in the following table:

Products	Last Year Projected Certified Volume (MT)	Actual Certified Volume (August 2021 to July 2022) (MT)
FFB Certified (MT)	-	462,140.33
CSPO (MT)	-	97,020.60
CSPK (MT)	-	14,079.99

According to the data during the certification period, there still not any overproduction yet. Due to sanction, the production of FFB, CPO and PK cannot be claim as RSPO product.

Mechanisms for handling unsuitable FFB and / or documents have included in the supply chain certification standard procedure with document number SOP/PKS/14, effective date 26 September 2020.

3.8.8

There are no sales of CSPO and CSPK since the mill obtained the RSPO certificate. However, the management shown the template of dispatch documentation such as contract agreement, delivery order, delivery ticket, report of loading, weighing minutes, weighing card, and delivery note. Those documentation cover informations of delivery date, description of product and supply chain model, product quantity, identification number, certificate number, sender's name and address of the seller.

3.8.9, 3.8.10 and 3.8.11

There are no sales of CSPO and CSPK since the mill obtained the RSPO certificate. The unit of certification has legal ownership of CPO and PK and did not outsource its milling activities. Vehicles and bulking owned by PT Bio Inti Agrindo.

3.8.12

The company has had the up-to-date record and report that are kept in mill office, complete, accurate and up-to-date. All the record can be accessed by the auditor, such as sales contract, delivery order/invoice, production report and product sales. Based on document verification on supply chain procedure, retention time for all records and report regarding to supply chain are kept for 2 years.

There are no sales of CSPO and CSPK since the mill obtained the RSPO certificate. Due to sanction, the production of FFB, CPO and PK cannot be claim as RSPO product by POM 2 PT BIA.

3.8.13 and 3.8.14

The conversion rate of production of CPO (OER) and PK (KER) were based on actual daily, monthly and yearly production. The extraction rate follows the actual data for a 12-month period for August 2021 until July 2022 i.e OER 22.46% and KER 3.28%. Periodically update of extraction is actual extraction.

3.8.15

SCSS module used in POM 2 is Mass Balance (MB), because the mill receives FFB from the estate RSPO certified and from third party that non-certified RSPO.

3.8.16 and 3.8.17

There are no sales of CSPO and CSPK since the mill obtained the RSPO certificate. Due to sanction, the production of FFB, CPO and PK cannot be claim as RSPO product by POM 2 PT BIA.

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

UoC showed their commitment due to respecting human rights stated in the stated in the Directors Decree No. BIA/DIE/27/190225 concerning Human Rights Policy validated by the President Director on 25 February 2020. This policy explained that PT. Bio Inti Agrindo committed to respect and protect human rights and avoiding the disallowance of human rights, protecting the human rights defender or complainant of human rights' abuse.

UoC's commitment in respecting the human rights has been well implemented proved by the absence of issues and incidents of human rights violations that occurred in the operational areas for mill and 2 estates. Based on the interview with workers in estates (harvesters, pesticide sprayers, and maintenance workers), workers in mill (mill operators and warehouse workers), they stated that there were no incidents or issues of human rights violations occurring in the operational area of the certification unit. UoC also had respecting the rights of human right defenders and prohibiting the retaliation towards human right defenders.

4.1.2

Based on the interviews with the surrounding communities, indigenous communities, occupants, and workers, it revealed that up until this assessment, if there was any conflicts or disputes with the company, the resolution action taken was deliberation without involving any violence's or mercenaries. Resolution of conflicts / problems using these deliberations has been quite effective and during the past year there have never been any conflicts / problems in UoC's work area.

The Official National Soldier who had been placed by the government only for securing borders and areas of vital objects in the Merauke region based on decree No. Sprin/39/VIII/2019. The unit of certification was undirectly hires and employ the national soldier. Based on interview with worker at Estate A, there were no issues related to violence perpetrated by mercenaries from PT BIA.

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

UoC showed some policies related to grievance system, here as follows:

- SOP No. SOP/HRD/08 validated on 24 March 2022 concerning in handling workers grievances. The policy explained activities of handling grievances related to manpower or non-manpower (e.g: facilities, etc).
- SOP No. SOP/SOS/04 validated on 20 May 2022 concerning in handling grievance and dissatisfaction. The policy explained the mechanism of external communication (e.g: contractors, suppliers, government agency, etc) including the mechanism if there were any grievances. This policy also explained that the company can be brought the complaints to the RSPO complaint system if there wasn't any solution yet and protected the identity of the whistleblower if needed.

Based on the interviews with the surrounding communities, occupants, and workers (harvesters and mill operators), the workers had a good understanding of the communication procedures and personnel who served as communicators between the company and the community so that illiterate people can be informed by the related communicators.

4.2.2

Unit of certification showed SOP No. SOP/SOS/04 validated on 20 May 2022 concerning in handling grievance and dissatisfaction. In the general mechanism of handling grievance, is stated as follows:

- The company's commitment to protect the anonymity of whistleblowers.
- Submission verbally or in writing to the contact person of the company or through labor union.
- Responses will be given at a maximum of 21 days.

In addition, the policy explained that all complaints will be summarized and recorded in the List of External Complaint Monitoring. However, illiterate people can submit their complaints through the village head or another representative from the stakeholder and also recorded in the List of External Complaint Monitoring.

4.2.3

Based on interviews with workers and external or internal stakeholders, it's known that they have understood the person responsible and the grievance mechanism in which the complainant's identity is protected.

Based on the field visit and the interview with the occupants in housing area, there were a grievances related to housing facilities which has been informed as a grievance to the UoC but there were no information updates related to the grievance which has been reported, for instance: The grievance related to roof leak in housing area of Division 3 and Division 7 in Estate B.

Based on the grievance record from all suggestion box in PT Bio Inti Agrindo period of 2021 to 2022, there was no grievance reported through suggestion box. In addition, based on the logbook of PT BIA internal grievance, it's known that in 2022 there was only two grievances and not related to facilities as informed during field visit. Based on the explanation above, **this indicator become the minor non-conformity No. 2022.03.**

Based on the interviews with government agencies, surrounding communities, gender committees, labor unions and workers, it's known that the grievance was related to corporate social responsibility and this point also become the non-conformity in indicator 3.4.3.

4.2.4

UoC showed the SOP No. SOP/SOS/04 validated on 20 May 2022 concerning in handling grievance and dissatisfaction and SOP No. SOP/HRD/08 validated on 24 March 2022 concerning in handling workers grievances. These policies explained the mechanism of handling any grievances and access to other parties such as Manpower Agency (tripartite) and RSPO complaint system if the grievance didn't meet any solution.

Based on the interview with the manpower agency, there was a mediation request from PT BIA regarding workers termination due to violation on behalf of BB (initial). The company showed the record of tripartite meeting and the calculation of termination payment in accordance with the existing law. Based on the recommendation of Manpower Agency from tripartite meetings on 18 July 2022, UoC stated that they committed to give Papuan natives empowerment but for this termination case, they will not directly re-employ the worker directly. UoC planned to employ the worker who got termination before, through recruitment process from the beginning.

In addition, UoC also showed the company's socialization using poster for all workers and external stakeholders posted in strategic spots e.g in front of the estate and mill office. This poster explained the mechanism of all grievances through the labor union or each worker's supervision and will be recorded in the grievance logbook. However, illiterate people can submit their complaints through the village head or another representative from the stakeholder and also recorded in the grievance logbook.

4.2.3 Status: NCR No. 2022.03 with minor category.

4.3

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

4.3.1

Based on the results of interviews and document verification, the following evidence was obtained:

- In the 2020 SIA study report conducted by Ekologika Consultant, there are recommendations for managing social impacts, one of which is the development of CSR programs to participate in improving the basic facilities of clans who own customary land, which provides convenience for companies and the community. The activities are expected to identify needs based on community proposals.
- The company already has a 2022 CSR program such as community assistance such as clan incentives, social assistance, and food aid (BAMA) which are routinely provided by the company. However, there is no evidence that the program was developed based on the results of consultations with the community.
- The results of the interview with the Company's PIC revealed that the company's CSR program was prepared by the company's management and was not based on the identification of community needs in the preparation of the CSR program.
- Based on the results of interviews with external stakeholders such as representatives of the Mandob Sejahtera Cooperative, IIsai Mandiri Cooperative, Kindiki Village, Selil Village, Mandekman Village, Mahuze Kewang and Mahuze Milafo clans, it is known that the CSR program owned by the company has not been based on the results of consultations and needs have not been identified with the community. This is because some of the CSR assistance provided by the company is deemed less targeted by the community.

Based on this explanation, the company has not been able to show evidence that the CSR program for community development has been carried out based on the results of consultations with local communities. **NCR No 2022.04 with Minor Category**

4.3.1 Status: NCR No 2022.04 with Minor Category
4.4

Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their Free, Prior and Informed Consent (FPIC).

4.4.1

The company for scope PT Bio Inti Agrindo - POM 2 has managed totaling area of **27,527.62 Ha**, which consist of **22,009.92 Ha** for core estate and **5,517.70 Ha** for plasma (division 2, 3 and 4). The corporate area originates from conversion production forest area that has been released through decree of forestry ministry No. 572/Menhut-II/2009 dated 28 September 2009 for an area of 36,400.90 Ha. The next process is land acquisition from customary land by providing compensation that conducted since 2007 to 2015. The company get the land use title for **27,527.62 Ha** in the form of HGU decree from head of national land agency No. 104/HGU/BPN RI/2013 dated 17 September 2013, with the details of HGU certificate are as follows:

- HGU certificate No. 11, dated 18 November 2013, valid thru 18 November 2043 for 1,351.15 Ha (Core Estate)
- HGU certificate No. 12, dated 18 November 2013, valid thru 18 November 2043 for 17,121.93 Ha (Core Estate)
- HGU certificate No. 13, dated 18 November 2013, valid thru 18 November 2043 for 3,536.84 Ha (Core Estate)
- HGU certificate No. 00053, dated 7 July 2021, valid thru 18 November 2043 for 1,119.01 Ha (Plasma Estate)
- HGU certificate No. 00054, dated 7 July 2021, valid thru 18 November 2043 for 3,920.80 Ha (Plasma Estate)
- HGU certificate No. 00055, dated 7 July 2021, valid thru 18 November 2043 for 477.89 Ha (Plasma Estate)

4.4.2

PT Bio Inti Agrindo has acquired land within the location permit area from the rights and interests of other parties, which are briefly explained as follows:

- The company has acquired land for the managed area of 34,194.52 Ha from the rights and interests of other parties. This is stated in the explanation of the Minutes of the Examination Committee of the Land B Committee of Papua Province No. 42A/KEP-91/V/2011 dated May 23, 2011 for an area of 6,666.9 Ha and No. 305/300-91/III/2013 dated March 19, 2013 which states that:
 - The land being applied for is state land originating from the release of part of the production forest area which can be converted based on the Decree of the Minister of Forestry of the Republic of Indonesia dated September 28, 2009 No. SK.572/Menhut-II/2009 on a land area of 36,400.90 Ha.
 - The land requested is obtained from the release of customary land that has been released with compensation given by PT BIA.
 - The land being applied for does not have any objections or problems with the indigenous peoples as the owners of the customary land parcels and with the surrounding community.
- Exemption from the interests of customary rights, based on the HGU Certificate owned, it is known that the HGU area of PT BIA consists of 2 expanses of land, namely Block 1 (Estate A / HGU Certificate No. 1) and Block II (Estate B and C / HGU Certificate No. 11, 12 and 13). The two areas are separated by the Bian River which flows from north to south and the Trans Papua road that connects every district in the Papua Province Region. The results of document verification and interviews with customary

owners revealed that Block 1 belongs to the Basik – Basik (Basik Mil) and Mahuze Besar clans from the Marind Tribe and the Renggam clan (Basik – Basik sub clan), Genbenop (Basik – Basik sub clan), and Warenop (sub clan Mahuze Besar) from the Mandobo Tribe. Block 2 is customary land owned by the Mahuze Milafo and Mahuze Kewam clans from the Marind Tribe in Indonesia and belongs to the Kaula, Basikuen, Gakuen, Rekuen and Ngasikuin clans from the Marind Tribe in Papua New Guinea. The results of document verification and interviews with management and representatives of indigenous peoples show that the company can show documentation of handing over customary land for plantation development.

As explained above which states that PT BIA is separated in two (2) stretches and the two areas are separated by the Bian River which flows from north to south and the Trans Papua road which connects every district in the Papua Province Region. In this regard, the company can show records of land acquisition, for example:

- Statement and Agreement Letter for Construction and Use of Access Road from PT BIA in Ullin District By Marga Mahuze on March 9, 2012.
- A statement on the release of customary land rights of the Omba clan in Asiki Village, Jair District, Boven Digoel Regency, dated May 30, 2011 which was signed by both parties, the Head of the Village, Military District Commander of Jair District, the Head of Jair District and the Head of the Jair Police Sector.
- Statement Letter of Release of Customary Land for Construction of Access Road from Port to PT BIA Oil Palm Plantation Location by Marga Ekoki in Asiki Village, Jair District, Boven Digoel Regency On November 14, 2011 signed by both parties, the Village Head, Military District Commander Jair District, Head of Jair District and Jair Police Chief.
- Statement Letter of Release of Customary Land for Construction of Access Road from Port to PT BIA Oil Palm Plantation Location by Marga Omba Quimanop in Asiki Village, Jair District, Boven Digoel Regency On November 14, 2011 which was signed by both parties, the Village Head, Military District Commander, Jair District, Head of Jair District and Head of Jair Sector Police.
- Statement Letter of Release of Customary Land for Construction of Access Road from Port to PT BIA Oil Palm Plantation Location by Marga Gue in Asiki Village, Jair District, Boven Digoel Regency On November 14, 2011 signed by both parties, the Village Head, Military District Commander Jair District, Head Jair District and Jair Police Chief.

Based on interviews with 11 previous land owners or customary rights owners from the Mahuze Besar, Kaku, Renggam, Mahuze Milafo, Mahuze Kewam and Gebse clans, information was obtained that before the oil palm plantation land was opened, the company had held a meeting to the Tua Marga and members of the Clans in a participatory manner who explained that the area on the customary land to be released would be planted with oil palm and the Tua Marga as representatives of the Clans who owned the customary land agreed to this and without any coercion from any party.

4.4.3

The company can show the Map of Recognition of Customary Land / Customary Rights of Indigenous Peoples at the locations of PT Bio Inti Agrindo with a scale of 1:50,000 which has been signed or fingerprinted by the Tua Marga with boundary witnesses as well as legalized and justified by the Government Region (Head of Village, Head of District and Head of Tribe/Custom).

Based on interviews with 11 previous land owners or customary rights owners from the Mahuze Besar, Kaku, Renggam, Mahuze Milafo, Mahuze Kewam and Gebse clans, information was obtained that before the oil palm plantation land was opened, the company had held a meeting to the Tua Marga and members of the Clans in a participatory manner who explained that the area on the customary land to be released would be planted with oil palm and the Tua Marga as representatives of the Clans who owned the customary land agreed to this and the maps shown have also been signed that indicated the mapping was carried out in a participatory and participatory manner involve affected parties.

4.4.4

As explained in indicator 4.4.2, it is known that the negotiation process for land release has been carried out in a fair, open, and transparent manner and is based on the agreement of both parties without any coercion from either party. The community represents itself in the process. All relevant information regarding land acquisition is available in appropriate forms and languages.

4.4.5

Based on interviews with 11 previous land owners or customary rights owners from the Mahuze Besar, Kaku, Renggam, Mahuze Milafo, Mahuze Kewam and Gebse clans, known that all land acquisition between local people and company representatives conducted as mutual agreement and with Bahasa that understood by all parties involved. The compensation process is done directed to the land owner and not diminish the legal/customary right; landowners are given the freedom to release their land without coercion.

4.4.6 Implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties, it can be seen in the report on SIA management and monitoring for 2021 and 2022. Based on the results of interviews with stakeholders (Selil Village, Kindiki Village, Mandekman Village and plasma cooperative representatives and 11 previous land owner), it was informed that the company has had a positive impact such as employee recruitment, plasma provision and CSR assistance. There are no land conflicts between the community and the company.		
	Status: Comply	
4.5 No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.		
4.5.1; 4.5.2; 4.5.3; 4.5.4; 4.5.5; 4.5.6; 4.5.7; 4.5.8 There are no new plantings after 2018 in the managed area, but there is new planting after 1 January 2010 without NPP and this become object of sanction for 3 years after obtaining the RSPO Certificate. The planting year of 2018 is insertion not new planting. The compensation process has been finished in 2015 and not diminishing the legal/customary right and the land acquisition been through without coercion. Based on interviews with 11 previous land owners or customary rights owners from the Mahuze Besar, Kaku, Renggam, Mahuze Milafo, Mahuze Kewam and Gebse clans and also as a Kindiki dan Selil village community, known that the land has been compensated and there is no claim/ dispute land between community and the company.		
	Status: Comply	
4.6 Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.		
4.6.1 The company has procedure of Land Compensation, document No. SOP/SOS/01 dated 24 December 2017 related to identifying legal, customary or user rights, and for identifying people entitled to compensation. Based on interviews with 11 previous land owners or customary rights owners from the Mahuze Besar, Kaku, Renggam, Mahuze Milafo, Mahuze Kewam and Gebse clans and also as a Kindiki dan Selil village community known that they know about the procedure through the socialization given and they agree with the procedure.		
4.6.2 The company has procedure of Land Compensation, document No. SOP/SOS/01 dated 24 December 2017. The procedure is described how to calculate and distribute fair and gender-equal compensation in all activities related to the compensation process for land over the land right cultivated by the Company, the purpose is to ensure the area of plantation free from others right. Based on interviews with 11 previous land owners or customary rights owners from the Mahuze Besar, Kaku, Renggam, Mahuze Milafo, Mahuze Kewam and Gebse clans and also as a Kindiki dan Selil village community known that they know about the procedure through the socialization given and they agree with the procedure and compensation process was done directed to the land owner and landowners are given the freedom to release their land without coercion.		
4.6.3 PT BIA already has cooperation in the development of plasma plantations namely Mandob Sejahtera Cooperative. Based on the data from the farmers in the Cooperative, it is known that there are farmers with gender and women. This indicates that there are equal opportunities for men and women to have land rights in the plasma.		
4.6.4 Based on the results of interviews with previous land owner, information is obtained that he has received compensation for the land he has claimed and all the files for the settlement process are also kept by the person concerned. All land claim settlement processes, from identification, negotiation to compensation, are carried out through the agreement of the parties without any coercion or pressure from other parties.		

Exemption from the interests of customary rights, based on the HGU Certificate owned, it is known that the HGU area of PT BIA consists of 2 expanses of land, namely Block 1 (Estate A / HGU Certificate No. 1) and Block II (Estate B and C / HGU Certificate No. 11, 12 and 13). The two areas are separated by the Bian River which flows from north to south and the Trans Papua road that connects every district in the Papua Province Region. The results of document verification and interviews with customary owners revealed that Block 1 belongs to the Basik – Basik (Basik Mil) and Mahuze Besar clans from the Marind Tribe and the Renggam clan (Basik – Basik sub clan), Genbenop (Basik – Basik sub clan), and Warenop (sub clan Mahuze Besar) from the Mandobo Tribe. Block 2 is customary land owned by the Mahuze Milafo and Mahuze Kewam clans from the Marind Tribe in Indonesia and belongs to the Kaula, Basikuen, Gakuen, Reken and Ngasikuin clans from the Marind Tribe in Papua New Guinea. The results of document verification and interviews with management and representatives of indigenous peoples show that the company can show documentation of handing over customary land for plantation development.

Based on interviews with 11 previous land owners or customary rights owners from the Mahuze Besar, Kaku, Renggam, Mahuze Milafo, Mahuze Kewam and Gebse clans, known that all land acquisition between local people and company representatives conducted as mutual agreement and with Bahasa that understood by all parties involved. The compensation process is done directed to the land owner and not diminish the legal/customary right; landowners are given the freedom to release their land without coercion.

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

The company has a procedure in place to identify people and/or community groups entitled to compensation presented in document No. SOP/SOS/01 dated 24 December 2017. The procedure is described how to identify people and/or community groups entitled to compensation. Based on interviews with 11 previous land owners or customary rights owners from the Mahuze Besar, Kaku, Renggam, Mahuze Milafo, Mahuze Kewam and Gebse clans and also as a Kindiki dan Selil village community known that they know about the procedure through the socialization given and they agree with the procedure and compensation process was done directed to the land owner and landowners are given the freedom to release their land without coercion.

4.7.2

The company has procedure of Land Compensation, document No. SOP/SOS/01 dated 24 December 2017. The procedure is described how to calculate and distribute fair and gender-equal compensation in all activities related to the compensation process for land over the land right cultivated by the Company, the purpose is to ensure the area of plantation free from others right. Based on interviews with 11 previous land owners or customary rights owners from the Mahuze Besar, Kaku, Renggam, Mahuze Milafo, Mahuze Kewam and Gebse clans and also as a Kindiki dan Selil village community known that they know about the procedure through the socialization given and they agree with the procedure and they can access the procedure through management representative of the company if they need it.

4.7.3

The company can show recapitulation of previous landowners who have been compensated. Based on interviews with 11 previous land owners or customary rights owners from the Mahuze Besar, Kaku, Renggam, Mahuze Milafo, Mahuze Kewam and Gebse clans and also as a Kindiki dan Selil village community, the communities that have lost access and rights to land also provided opportunities to benefit from plantation development such as plasma plantation cooperation, job opportunity and other benefit in the form of CSR program.

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 and 4.8.4

Based on public consultation with related government agencies of Merauke District and village representatives (Kindiki Village, Selil Village and Mandekman Village) and interview 11 previous land owners, known that there is no land dispute case for the last 1 years until this assessment conducted in the scope certification area. Based on interviews with management of unit certification and the results of the auditor's search on online media, there is no historical or current land dispute in unit certification.

4.8.3

No evidences show that there is any acquisition process through dispossession or forced abandonment. Based on public consultation with related government agencies of Merauke District and village representatives (Kindiki Village, Selil Village and Mandekman Village) and interview previous land owners, known that all land acquisition between local people and company representatives conducted as mutual agreement and the compensation process are done directed to the land owner and not diminish the legal/customary right, landowners are given the freedom to release their land without coercion.

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

Determination of FFB prices to Plasma Cooperatives, following the determination of FFB prices for Palm Oil from the FFB Pricing Team of the Papua Province Food and Agriculture Office, for example Minutes of Meeting Results of the FFB purchase price determination team for PIR-BUN Plasma Smallholders Papua Province (Zone II) for the period of July 2022 for example, the price of FFB with a plant age of 10-20 years is IDR 2,293.62 and a plant age of 25 years is IDR 2,058.97.

Based on the results of interviews with representatives of the Mandob Sejahtera Cooperative and the IIsai Mandiri Cooperative, it is known that the price of FFB set by the company is based on the price from the Papua Province Food and Agriculture Office. In terms of determining the price of FFB, the Plasma Cooperative is always involved and invited to a meeting in Jayapura.

5.1.2

The price of FFB to farmers is determined by the Department of Agriculture and Food of the Papua Province. In determining the price of FFB, farmers are also involved. The determination of FFB prices is always known by plasma farmers because every time there is an update on FFB prices, the company always provides information to the cooperative leadership to be informed to all members. This is in line with the results of consultations with cooperative management which stated that information related to FFB prices was known through information from the company.

5.1.3

As explained in indicator 5.1.2 that the price of FFB to farmers is determined by the Agriculture and Food Office of the Papua Province. In determining the price of FFB, farmers are also involved. The determination of the FFB price is always known by the plasma farmers. The price agreement has also been explained in the cooperation agreement between the company and the farmers where the price of FFB is based on the price set by the Department of Agriculture and Food. For the determination of the premium value until the assessment activity is carried out there has been no determination of the premium value between the company and the farmer.

5.1.4

Based on the results of interviews with representatives of the Mandob Sejahtera Cooperative and the IIsai Mandiri Cooperative, it is known that the cooperative has understood the contract/Mou with the company and there is no coercion from the company. So far, the cooperation with the company has been going well and the cooperative has the authority to make decisions.

5.1.5

The company can show a cooperation agreement with the Plasma Cooperative, namely the Mandob Sejahtera Cooperative, namely: The cooperation agreement for the development of people's gardens with the Mandob Sejahtera Cooperative as stated in the cooperation agreement no. 001/BIA-KPPSMS/SPK/IX/2016 located in Mandekman Village, Ulilin District, Merauke Regency on 23 September 2016 which is valid for 30 years covering an area of \pm 5,440 Ha (20% of the effective plantation area). The agreement is known by the local government, namely the Head of the Forestry and Plantation Service, the Head of the Cooperative Service, and approved by the Merauke Regent. Where for cooperatives that signed the SPK, the Power of Attorney for the Chairperson, Deputy Chairperson, Secretary I, Secretary II and Treasurer, while from PT. Bio Inti Agrindo represented by the President Director of PT. Bio Inti Agrindo. Furthermore, in 2021 there will be an amendment/Addendum to the Cooperation Agreement No. 001/BIA-KPPSMS/SPK/IX/2016 which was carried out on 20 August 2021 with the addendum agreement Number 004/BIA-

KPPSMS/SPK/V/2021. The addendum was made due to changes in the provisions of the articles in the previous agreement. The changes include:

- Amend article 2 paragraph 1 so that the parties agree to cooperate to build and manage an oil palm plantation covering an area of 20% of the area of HGU owned by PT BIA, which is $\pm 6,867.7$ Ha.
- Amend article 6 paragraph 1.3 and paragraph 2 so that the cooperative (the first party) bears its own responsibility regarding the costs of managing the Cooperative HGU, funding, disbursing loan loans, payment of principal installments and loan interest for development costs.
- This addendum should be construed as complementary and an integral part of the 2016 Cooperation Agreement.

Based on the results of interviews with management representatives and representatives of the Mandob Sejahtera cooperative, it is known that the agreement between the company and the plasma is only for the Mandob Sejahtera cooperative. The 20% land given to the Mandob Prosperous Cooperative will be redistributed with the CPCL (Prospective Land Owners) to other clans. Mandob Sejahtera Plasma Cooperative and Other Cooperatives are the scope of POM 1 and POM 2 certification.

5.1.6

The company can show proof of payment of FFB to the Mandob Sejahtera Plasma Cooperative, for example for the period July 2022 with Invoice No. 1017100281 dated July 31, 2022. The verification result shows that the FFB payment made by the company is in accordance with the price set by the Papua Provincial Agriculture and Food Service and in accordance with the amount of FFB originating from Plasma land.

Based on the results of interviews with representatives of the Mandob Sejahtera cooperative, it is known that the company has paid FFB in accordance with the price set by the government. There were no complaints regarding payments made by the company.

5.1.7

The company has carried out the results of testing the scales, namely:

- Certificate of weighing bridge test results with Number 240/PKTN.4.10/KHP/DL/11/2021 dated 19 November 2021 for Avery Weight Tronix type ZM510-SD4 with serial number 181550624 with a capacity of 60,000 Kg from the Directorate General of Consumer Protection and Orderly Commerce Directorate of Metrology Regional IV Legal Metrology Standardization Center with the result of being ratified based on the Republic of Indonesia Law Number 2 of 1981 and will be recalibrated on November 19, 2022.
- Certificate of weighing bridge test results with Number 239/PKTN.4.10/KHP/DL/11/2021 dated 19 November 2021 for the Avery Weight Tronix type ZM510-SD4 with serial number 181550642 with a capacity of 60,000 Kg from the Directorate General of Consumer Protection and Orderly Commerce Directorate of Metrology Regional IV Legal Metrology Standardization Center with the result that it was ratified based on RI Law No. 2 of 1981 and will be re-calibrated on November 19, 2022.

5.1.8

Based on the results of document review and interviews with the company, there are no independent smallholders who supply FFB from POM 2. The partnership that supplies FFB to POM 2 has received an RSPO certificate.

5.1.9

The company shows the SOP for Handling Complaints and Dissatisfaction with the number SOP/SOS/04 dated July 20, 2020 as a reference for all employees in handling any complaints and dissatisfaction both from internal and external stakeholders related to the company, in accordance with applicable laws and regulations. apply.

Implementation of handling complaints and dissatisfaction, among others:

- Related Department Managers together with the Public Relations Manager/ HRD Manager can handle complaints and dissatisfaction after obtaining approval from the General Manager/ Management. Responses to complaints and dissatisfaction are given as soon as possible and no later than 30 working days after the report is received.
- The Public Relations staff is responsible for recording the complainant's response whether the complainant is satisfied with the company's response in the complaint resolution report.
- If the complainant is dissatisfied with the company's response, a third party is needed to mediate so that the status of the complaint does not become a dispute.
- The Public Relations Manager is responsible for coordinating third parties and re-inviting the reporting party so that the problem

or complaint submitted can be resolved immediately.

Based on interviews with the management of the Mandob Sejahtera Cooperative, it is known that all complaints from farmers will be submitted to the company. So far, the complaints submitted are submitted directly to the company PIC and are always responded to by the company.

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

Based on document verification and interviews with the Mandob Sejahtera Cooperative and the Insay Mandiri Cooperative, it has been certified RSPO and is within the scope of RSPO certification Scope of POM 2. In addition, the company also prepares a PIC to support operational activities carried out by cooperatives in managing plantations in accordance with the RSPO Principles and Criteria.

5.2.2

Based on document verification and interviews with the company and representatives of plasma smallholders, it was found that the Mandob Sejahtera Cooperative and the Ilsai Mandiri Cooperative were RSPO certified and became the scope of RSPO certification. has also conducted socialization related to plantation management in accordance with the principles and criteria of the RSPO as well as cooperative managerial training to cooperative management to manage cooperatives well.

5.2.3

The legality of FFB production from farmers from the Mandob Sejahtera Cooperative and the Ilsai Mandiri Cooperative is in the form of HGU and the farmers' land is not located in the forest area. In addition, the cooperative has also received RSPO certification.

5.2.4

The management of the plasma area is fully carried out by the company, so directly for plasma will be included in the scope of certification. The CH has conducted spray training of plasma workers. The CH showed evidence in the form of reports on socialization activities and spray training for Plasma Divisions 2 which were carried out on September 06, 2021 with 8 participants and Plasma Divisions 3 and 4 which were carried out on September 10, 2021 with 15 participants. The training included the practice of using spray PPE and the importance of PPE, handling pesticides, and spraying work techniques.

5.2.5

The company has reported the progress of the plasma farmer program in the Plantation Business Development Report which is reported to the Merauke Regency government.

Status: Comply

PRINCIPLE #6 RESPECT WORKERS' RIGHTS AND CONDITIONS

6.1

Any form of discrimination is prohibited.

6.1.1

UoC had a Policy concerning on discrimination disallowance in the workplace stated in the Director Decree No. BIA/DIR/13/171221 validated by the President Director on 22 December 2017. The group aims to provide fair and equal opportunities to all its workers. UoC committed to ensure that every operation activities never based on specific characteristic such as religion, ethnicity, race, group, class, and gender.

UoC also showed the record of the company's socialization for instance the socialization which was conducted on 20 February 2022 attended by the workers in Estate C. Based on the workers' recruitment document and interviews with the workers, UoC had provided equal opportunities in recruitment and operational activities. In addition, in job vacancies that have been published by the company, there were no requirements that discriminated against gender, race or ethnicity, disability, sexual orientation, age, or belief.

Based on the interviews with the gender committee, female workers are given equal rights, wages and opportunities to get promotions with male workers of the same type of work, for example, there were also female workers in field, such as pesticide application activities.

6.1.2

UoC showed job vacancy announcements and work agreement letters between workers and company which showed that there was no payment requested during the recruitment process. In addition, in job vacancies that have been published by the company, there were no requirements that discriminated against gender, race or ethnicity, disability, sexual orientation, age, or belief.

Based on the interviews with the manpower agency, gender committee, labor unions, and workers (harvesters and mill operators) at POM 2, Estate B, Estate C, and Plasma Division 2, 3 and 4, it is known that workers have never felt that the company has discriminated against them. It was explained that all activities from recruitment, performance appraisal, and promotion were given equal opportunity regardless of ethnicity, caste, nationality, religion, disability, gender, sexual orientation, gender identity, membership in labor unions, politics, or age. There was no difference in the communication between superiors and workers because of the things mentioned above, so the workers did not feel isolated or discriminated against by the superiors. The company also didn't request for any payment during the recruitment process.

Based on the interview with the management representatives and the document review, there were a migrant staff but placed in managerial job.

6.1.3

During recruitment process, the company had set the standard of competence that required based on the offered position. Selection had include evaluation of skills, performance and medical test result. Furthermore, promotion is conducted based on work period, annual evaluation result and availability of position. All workers are treated equally in accordance with company regulation including rights of the worker as well. Records on manpower procedure had been documented, as verified randomly to the several documents, here as follows:

- Recruitment document in accordance with the recruitment requirements such as employment request form, application letter, statement of police report, identity card (KTP), family identity card (KK), the result of medical check up, and work agreement letter. For example, a worker on behalf of SH (initial) who started working as a harvesting worker on 10 May 2022 with three months probation.
- Promotion documents such as management decree for worker's promotion No. BPHNL/SK-P/211019-C for a worker on behalf of TR (initial) who had a promotion based on worker's appraisal, from contract worker to permanent worker on 19 October 2021.

6.1.4

Based on field observation, interviews with the management and workers, it is known that there were no discriminatory in pregnancy testing given by the company. The pregnancy test conducted only to ensure that no pregnant workers in any agrochemical works such as pesticide application and fertilizing activities proven by there was no requirement regarding pregnancy test in recruitment SOP, job hiring announcement, and medical test during recruitment. UoC also showed the list of pregnant women which informed all pregnant workers are placed in non-agrochemical works such as day care officer and administrative staff.

6.1.5

Gender committees had been formed and still active until today in PT Bio Inti Agrindo which are chaired by the head of gender committee. The structure of the gender committee consists of male and female workers. The main objective of forming a gender committee is to provide a forum that can accommodate the aspirations or complaints of workers (especially women).

UoC showed the policy related to sexual harassment stated in Decree No. BIA/DIE/18/171221 validated on 22 December 2017. UoC also informed that they also socialized the protection of worker's reproductive rights and disallowance of sexual harassment on 10 August 2022 to workers and workers' spouse. This procedure stated that if there were any violence or harassment, workers can communicate to the gender committee.

Based on the interviews with several workers, they also knew of the existence of the gender committee because it had been routinely socialized by its management, the last socialization related to the sexual harassment and domestic violence against women. The activity was carried out twice a year and attended by female workers and housing residents.

Based on the document review and the interview with the gender committee representatives, there was a reporting case related to the sexual harassment to female in housing area on 29 June 2022. Gender committee then showed their role by giving some mediation

and counselling to both victim and suspect.

6.1.6

Equal payment of wages has been made by the unit of certification properly, by considering the ability, performance, expertise, work period and other factors as a basis for remuneration. So that the payment of wages provided is in accordance with the types of work respectively. In addition, based on the documents review of structure and scale wage, it was found that the UoC already had a wage scale structure for each worker based on position and grade (not based on gender or origins).

Based on the interviews with workers (harvesters, maintenance workers, and mill operators), the workers already know that there was a wage scale structure for each level of workers and this has been proven by the difference in the monthly wage income presented on the pay slip. Based on the document review of worker's pay slip in both gender and the interviews with the workers in the same grade and same job, it's known that the monthly wages received are in accordance with the grade owned by each worker.

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

UoC had procedures related to recruitment, selection, remuneration, promotion, retirement and termination of employment which are generally described in the Collective Labor Agreement period of 2021 to 2023 written in *Bahasa*. This CLA has been signed by the head of manpower agency of Merauke District. This CLA explained the working conditions and rights / obligations of workers such as recruitment, selection, transfer, promotion, performance appraisal, remuneration, discipline, overtime, and other provisions. It's applied to all workers and had been routinely disseminated by the certification unit to all employees, one of the socializations that was carried out on 10 to 16 March 2022 to all workers in estate B and POM 2.

Based on the interviews with workers (harvesters, pesticide application workers, and mill operators) and labor union representatives, it concluded that workers have a sufficient understanding of their rights (wages, overtime, incentives, etc.) listed in the CLA and in accordance with routine socialization provided by the certification unit. Workers' wages in 2022 have been above the minimum wage set by the government. Wage based on years of service, ability, attendance and job performance (structure and scale wage) and there were no late payments every month.

Based on the explanation above, it can be concluded that the workers have understood the work requirements that have been socialized by the certification unit in an understandable language (*bahasa*).

6.2.2 and 6.2.3

UoC has CLA period 2021 to 2023 provided in *Bahasa* that explains the working conditions and rights / obligations of workers such as recruitment, selection, transfer, promotion, performance appraisal, working hours, remuneration, discipline, deduction, overtime, sick leaves, holiday entitlement, maternity leave, and other provisions. These all stated in each worker's work agreement. Explanations related to the contents of the company regulation, including:

- Article 35 concerning working time which explains that the working time is 7 hours per day or 6 working days in a week in which the total working hours are 40 hours in a week.
- Article 21 concerning wages which explains that the lowest wage of worker couldn't be lower than the minimum wage set by the government every year.

In addition, remuneration is generally stated in company regulation, and specifically stated in a decree explaining these matters, as follows:

- Decree of the Regent of Merauke No. 90010164 concerning the minimum wage of Merauke District in Papua period of 2022 is referring to minimum wage of Papua in 2022.
- Decree of the Governor of Papua No. 561/138882/SET concerning the minimum wage of Papua in 2022 is Rp. 3,561,932.-/month validated on 19 November 2021.
- Structure and Scale of Wage of PT. Bio Inti Agrindo mill workers in 2022. It's known that workers with the lowest wages are employees with Q grade and the highest wages are employees with Q grade. It's informed that for security and workshop worker, UoC gave permanent incentive including the overtime which simulated as 46 overtime hours.

UoC showed overtime payment in June 2022 to July 2022 that has been in accordance with applicable laws for workers on behalf of YIR and EP (initial) as boiler operator, and PW and HM (initial) as security. In the pay slip document, it's known that the nominal of the worker's overtime wages has in accordance with the overtime calculation. For security workers, auditor did some calculation to simulate the total working hours payment based on the worker's attendance list which informed the time they started work and finished work. Based on the calculation, it's known that the permanent incentive received were above the overtime payment referred to the regulation.

A review of payslip document (harvester, maintenance worker, security, and mill operators) for June to July 2022, proved that the wages received are above the minimum wage and in accordance with the wage scale structure determined by the certification unit for 2022. For example, workers' wages on behalf of YIR (initial), JE (initial), AS (initial), have a different wage based on wage scale structure in 2022 and all wages above the minimum wage. Payslip document gives accurate information on compensation consist of basic wage, allowance, overtime, working days and deduction.

UoC also showed paid leave letter which showed that maternity leave was given 3 months of paid leave. For example, the paid leave letter on behalf of SK (initial), who had given 3 months (from 17 May 2022 to 14 August 2022) and had been approved by the supervisor on 23 April 2022.

Based on the field visit in Plasma Division 3 Estate, there was a person on behalf of WR (initial) who was helping his spouse in loose fruit picking activity. Based on the interview with the person who's helping her spouse, it's known that she was not registered as the UoC's worker and didn't have any work agreement with the company.

Based on the list of workers in PT BIA specifically in Plasma Division 3 Estate period of July 2022, there was no worker on behalf of WR (initial) registered as the worker in Plasma Division 3 Estate. Based on the interview with the foreman, it's known that there were still harvesting workers helped by their family who wasn't registered as the worker (aside from the one who auditor found during field visit), but during field visit the others were sick.

Based on the explanation above, it's known that there was still a personnel who worked in the company's operational area without having the work agreement signed before work. This was not in accordance with the existing regulation, so **this indicator become the major non-conformity No. 2022.05.**

6.2.4

UoC has provided welfare facilities to occupants in the form of housing, water supply, educational facilities, mosque, school, and other facilities in each unit. Based on the field visit in the housing area in plasma and main estate area, it revealed that workers were provided with adequate housing facilities with and there was daycare for children. The house is inhabited by 1 family.

In addition, the company also provided waste disposal sites for domestic waste management. For health services, the company provides clinics and paramedics. Based on field observations, it's known that the facilities and infrastructure provided for workers are still functioning properly.

In general, the facilities provided by the certification unit are in good condition and sufficient quantities related to the number of workers in each unit. Based on field observation, all housing has well-maintained drainage but some facilities were in damage, such as roof leak. This matters has been raised as a non conformity in indicator 4.2.3.

6.2.5

UoC has provided accessible food sources by providing small canteen in the workers' area for lunch. In addition, there were also workers who open small business stalls to sell daily necessities in each housing. Based on the interviews with workers (harvesters and mill operators), labor unions and gender committees, it's known that workers have no difficulty in getting food sources because the company has provided cooperatives that sell daily necessities. In addition, workers can buy these needs to the markets around the company's area.

6.2.6

In Indonesia there were no living wage standard is established, so UoC still implemented the national minimum wages for all workers. In addition to the payment of minimum wages, certification unit has been conducting an assessment of the prevailing wages and in-

kind benefits provided to workers in the certification unit aligned with the RSPO Guidance for Implementing a Decent Living Wage.

UoC has the determination of assessment prevailing wage and all kinds of benefit for DLW simulation in 2022 has been included in the calculation of housing facility costs, water costs, electricity cost, mineral water costs, educational cost, daycare facility, health cost, and integrated healthcare center (Posyandu). The results of these calculations are known that the standard of prevailing wage currently given / simulated by the certification unit is above the stipulation of the minimum wage, as follows: Basic salary as much as Rp. 3,561,932 per month and the total wage and inkind benefits are Rp. 6,002,932 per month.

Based on interview with works and document verification, the calculation data of prevailing wages is rational in accordance with the local price in Merauke District.

6.2.7

Based on the document review of UoC's list of workers for the period of August 2022, it's known that in Estate B there were still 11 contract worker left, in harvesting activity. Based on the interview with management representatives and the document review, it's known that the 11 workers have not been appointed because they have not met the minimum criteria as a harvesting workers during workers appraisal. So they recommended to be appointed after the contract work agreement is over.

UoC then showed the plan to appoint 11 contract workers (PKWT) in harvesting, for example the workers on behalf of AL, FJ, IE, HN, CK (with initials) which is planned to be appointed in October 2022 after their PKWT work agreement period is over. UoC also showed their commitment stated in the CLA period of 2021 to 2023 that permanent works or core works are only for permanent workers (PKWTT).

6.2.2 Status: NCR No. 2022.05 with Major Category

6.3

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

6.3.1

UoC had a policy concerning on the freedom of association stated in the Directors Decree No. BIA/DIR/11/171221 validated by the Director. It stated that the UoC gave the freedom to all workers to form the labor union in accordance with applicable laws and being responsible and giving freedom towards the labor union to protect workers' rights and interests and improve workers' and their family member's welfare. The policy was published in *Bahasa* which can be understood by all employees.

Based on the interviews with labor union representatives (The head of labor union and The coordinator in Estate B and C), it explained that the company had given freedom of association and labor unions have been formed. The establishment of the union was in accordance with the applicable laws and regulations and has been recorded in Manpower Agency of Merauke District, as follows:

- The Registration Number. 001/DPC.K-SPSI/SK/MRK/XII/2018 of PT. Bio Inti Agrindo Labor Union on 17 December 2018.
- The establishment of labor union's organizer in 2021 No. 001/DPC.K-SPSI/SK/MRK/I/2021 on 16 January 2021.

UoC gave the freedom for worker to express their aspiration democratically and there was no intervention against labor union activity. Based on the document review, it's known that the UoC also documented the number of labor union operating in UoC operations area and its members' number. All workers were the member of labor union. Based on the interviews with labor union members representatives, it's known that there was no force or pressure to be a member of labor union. The membership of labor union was voluntary and all workers intended to be the member of labor union.

6.3.2

UoC has well-documented the records of meetings between labor unions and management representatives as well as with internal labor union meetings. The following are examples of records of meetings conducted by labor unions in 2022, here as follows:

- The meeting between the labor union in all units and management representative on 29 January 2022 to talk about the incentive and wages according to the existing regulation.
- The meeting between the labor union in all units and management representative on 12 February 2022 to discuss about the most local workers in Papua were only worked for a quick period times and the grievance mechanism.

Based on the interviews with labor union representatives and their members who work in each unit, it's known that the labor union

held meetings every month.

6.3.3

Based on the interviews with the labor union representatives, there was no interference in the selection or labor union operational activities. All processes of selecting, decisions making and planning activities, members' aspirations to their representatives run democratically. The worker who is currently placed as the head of the Labor Union is a worker at PT BIA, then there will be no conflict of interest that occurs with the company because there were no workers who have the authority as decision-makers (staff class and above). UoC also involved the labor union in drafted the collective labor union.

The establishment of the union was in accordance with the applicable laws and regulations and has been recorded at the Manpower Agency. Unit of certification was giving freedom for workers to express their aspirations and did not give any intervention related to labor union activity. Based on the interview with workers, it's known that there were no mandatory to be the member of labor union. The membership of labor union is voluntary.

Status: Comply

6.4

Children are not employed or exploited.

6.4.1

UoC had a policy concerning on children/underage worker protection stated in Directors Decree No. BIA/DIR/17/171221 validated by the President Director on 22 December 2017. It stated that the group committed to not employ child labor in any operational activities. UoC also showed the procedure of recruitment which stated that they do not employ underage worker.

UoC then showed that they had socialized the policy to all parties including smallholders and contractors for instance the socialization held on 2 March 2022 attended by all workers and contractor workers in division 4 Estate C.

6.4.2

UoC showed the recruitment document in accordance with the recruitment requirements such as application letter of workers on behalf of SH (initial), statement of police report, identity card (KTP), family identity card (KK) which stated that the worker is above the minimum age of worker.

UoC had socialized the policy to all parties including smallholders and contractors for instance the socialization held on 2 March 2022 attended by all workers and contractor workers in division 4 Estate C. Based on documents verification and field observation, there were no workers under the age of 18 and there was no child around the work area. In addition, UoC also includes clauses on child protection and prohibitions on hiring workers under the age of 18 in any agreement.

6.4.3

Based on documents verification and field observation, there were no workers under the age of 18 and there was no child around the work area. UoC also did not employ young worker and there were no internship program

6.4.4

UoC had socialized the policy to all parties including smallholders and contractors for instance the socialization held on 2 March 2022 attended by all workers and contractor workers in division 4 Estate C. Based on documents verification and field observation, there were no workers under the age of 18 and there was no child around the work area. In addition, UoC also includes clauses on child protection and prohibitions on hiring workers under the age of 18 in any agreement.

Status: Comply

6.5

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

6.5.1

UoC had a policy concerning on reproductive rights and the prevention of sexual harassment and violence stated in Directors Decree No. BIA/DIR/19/171221 validated on 22 December 2017 by the President Director. This policy stated that every worker is entitled to receive protection against sexual harassment in the workplace and if convicted of sexual abuse. UoC also committed to protect the health and the security of female workers by protecting their reproductive rights.

UoC also showed the record of the company's socialization using the poster posted in UoC's strategic spots. This poster explained

the mechanism of all grievances including violence and sexual harassment. However, illiterate people can submit their complaints through the representative of internal stakeholder (gender committee and labor union).

Based on the document review and the interview with the gender committee representatives, there was a reporting case related to the sexual harassment to female in housing area on 29 June 2022. Gender committee then showed their role by giving some mediation and counselling to both victim and suspect.

6.5.2

Based on the documents review and interviews with workers (harvesters, maintenance workers, and mill operators), disallowance of sexual harassment, violence, and pregnant worker in any agrochemical activities had been routinely socialized by the management through gender committee, one of the socialization was carried out on 8 August 2022 which was attended by workers and occupants in housing area.

Based on the interviews with the gender committee and daycare officer in Plasma Division 2, the company had given about 30 minutes for breastfeeding woman and provided certain place for breastfeeding in daycare.

6.5.3

UoC showed that they had well-evaluate the needs of pregnant women by periodically identify the needs of new mother and also involved the pregnant workers. UoC then showed the result of new mothers' need identification which was conducted in January 2022 based on the questionnaire given to 25 respondent of new mothers in Estate A, Estate B, Estate C, and Plasma. This document informed the needs of new mother, as follows: providing mother and child program (including pregnant women guidance, breastfeeding socialization, and medical check up), providing breastfeeding comfortness to new mom by giving mattress and chair to breastfeed in daycare.

Based on the interview with the management representatives and the field visit in Estate B, it is known that there were no daycare in all Divisions in Estate B due to the conversion of the building from daycare to Covid-19 quarantine room. Meanwhile, based on the document review of UoC's list of workers in July 2022, it is known that there were 153 female workers in Estate B. Then based on data on new mothers for the period of 2021 to 2022 in Estate B, it is known that the number of new mothers in 2021 was 3 new moms, and in 2022 were 3 new moms.

UoC then showed the collaboration agreement in construction daycare building in Estate B No. 2022/08/KK/BIA/24-06 between the company and CV Doa Ibu. In the agreement, it is informed that the work agreement was effective from 23 June 2022 to 23 August 2022 (it ended when the audit was carried out). However, there was no further information regarding the construction of the daycare in Estate B.

Based on the explanation above, it's known that the UoC has not been able to show the fulfillment of new mothers' need in accordance with the identification result, namely the provision of breastfeeding facility at the daycare. **This indicator has become the minor non-conformity No. 2022.06.**

6.5.4

UoC showed the procedure to accommodate complaints and grievance from external and internal including in sexual harassment and violence (No. SOP/SOS/04 validated on 20 May 2022). In the procedure described that if requested, the company guarantees the confidentiality of the reporting identity and the disclosure of disgrace or incident (whistleblower). UoC also provided whistleblowing by email, phone, and letter to complaint reporting unit for any confidentiality grievance.

Based on the interviews with workers it's known that the workers already have sufficient understanding of the grievance mechanism. Related complaints of sexual harassment can be submitted to the gender committee.

6.5.3	Status: NCR No. 2022.06 with Minor Category
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6.6

No forms of forced or trafficked labour are used.

6.6.2

UoC had a policy concerning on force-labor ban stated in No Desforestation, No Peat, No Exploitation (NDPE) Policy validated on 28 February 2020. The policy stated that the company respecting human rights and respecting employee rights such as the elimination

of discrimination, the prohibition of forced and child labor, fair wage provisions, upholding the principle of gender equality in accordance with legal norms, and protecting migrant workers.

UoC also showed the procedure of recruitment (SOP/HRD/01) validated on 24 March 2022 by the President Director which informed that workers do not take any recruitment fees at any stage of the recruitment process, and no retention of passports/identity documents. UoC then showed that on each work agreement between the certification unit and the contractor/supplier, there were clauses related to fulfilling legal obligations in Indonesia as one of the obligations that must be fulfilled by the contractors.

Based on the interviews with manpower agency, gender committee, labor union, and workers at Mill and Estates, it's known that workers have never felt discriminated and forced to work by the company. There were no significant obstacles related to employment or violations of company regulations. UoC provided output targets that can be obtained in less than 7 hours of work. If the harvester obtains more output within or more than 7 working hours, then the harvester will get the incentive payment. No penalty was given to the harvester if it does not get output due to natural factors such as rain. Based on pay slip document and foreman notes of harvesters daily output, the harvesters have earned more than daily output target and the wages the harvesters received was above the minimum wage.

There was no pressure/forced in doing overtime work, workers who had overtime at the company can refuse if ordered to do overtime activities because overtime is not the worker's obligation.

6.6.2

Based on documents review and interviews with the manpower agency, gender committee, labor union, and workers at PT BIA, it's known that migrant workers placed in managerial job. UoC showed the data of migrant workers and their compliance in migrant workers regulation such as An Expatriate Placement Plan (RPTKA) on behalf of LC (initial) from South Korea with RPTKA No. B.3/061328/PK.04.01/VII/2022 which was valid from 11 August 2022 to 10 August 2023.

During the assessment, the certification unit still has workers with contract status (PKWT) in harvesting activity (as mentioned in indicator 6.2.7). All the rights for each employment status has been distinguished for workers with contract status (PKWT) and the permanent status (PKWTT). There was no discrimination between contract workers and permanent workers.

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

In accordance with the Decree of the Head of the Department of Industry, Trade, Cooperatives, SMEs (UKM), and Manpower, number 009/P2K3/VI/2021 dated June 28, 2021, regarding the ratification of the OHS Committee structure of PT BIA. The secretary of the organization is AGK, who already has a letter as an OHS expert number 46001/PK3/AJ/94/2021/P1 which is valid until April 27, 2024.

The CH has an OHS Committee in each unit which is responsible for the implementation of OHS aspects. One of the activities of the OHS Committee is to conduct monthly evaluations related to the implementation of OHS programs. For example, in the OHS Committee meeting on 13 April 2022 which was attended by 17 members from POM 1, POM 2, Estate A, Estate B, Estate C, and Plasma. Among them are discussing the results of the ISO 45001 audit, management review, application of procedures when an incident occurs, and employee competence.

6.7.2

The CH has a first aid procedure with document No. SOP/HSE/05 revision 1, effective August 20, 2022 explains that:

- Point 2.3.6 states that the contents of the first aid kit are in accordance with Permenaker 15 of 2008.
- Point 2.3.7 states that the placement of first aid kits must be in a condition that is easily accessible, clearly marked, in a visible location and easy to move when used, the type and number of boxes adjusted to the number of workers based on the Attachment of the Minister of Manpower No. 15 of 2008.

Based on field observations in the harvesting activities of Block 39-81 Division 9 Estate B, it was found that the first aid bag brought by the foreman only contained 13 items, which did not comply with the procedures (21 items). Field observations in the fertilization activity of Block 41-50 Division 3 Plasma, it was found that the first aid bag brought by the foreman only contained 13 items, which did not comply with the procedures (21 items). Field observations at the Division 4 Plasma generator house, there are Rivanol and

Sodium Chloride that have expired. Field observations at PKS 2 IPAL, there is Betadine (povidone iodine) which has expired.

Correction and Corrective action in the previous NCR assessment (Initial Certification) it was found that the Company developed a first aid bag monitoring system and carried out monitoring of the first aid kits and bags. However, in the ASA-1 assessment, the contents of the box and first aid bag were expired and the contents were not in accordance with the procedures they had.

Based on this, it is known that the CH has not been able to show evidence that the contents of the first aid bag/box at the workplace are in accordance with applicable procedures and regulations. Due to the discrepancy in this indicator has not been met since the previous IC audit, the discrepancy in the indicator with this minor category has been **raised to the Major category**.

6.7.3

The CH has provided appropriate PPE to workers. The results of field observations, both at the estate and at the mill, it is known that the workers have used the appropriate PPE. The results of the interview also revealed that workers already knew the procedure for replacing PPE if it was damaged. For example, it is shown that the replacement of PPE apron for 2 periods for spray workers in Estate B, with the initials YS and FK.

The CH already has PT BIA's Plantation and Factory HIRADC 2022 document which has been in effect since January 2022 which explains that the Rinse House Activities include storage of work tools and PPE as well as personal cleaning (bathing). Based on interviews with spray workers in Block 39-81 Division 9 Estate B, it was found that employees cleaned themselves (showered) after doing the spray work at home. The results of the interview with the Company's PIC revealed that workers are still cleaning themselves (bathing) at home because the condition of the rinse house is not proper. Interviews with spray workers in Block 38-57 Division 7 Estate C, it is known that employees clean themselves (shower) after doing the spray work at home. Based on observations at the Rinse House Division 5 Estate C revealed that there was 1 bathroom for 14 spray and fertilizer workers with the bathroom door condition not locking, some walls wired and not completely closed. Observations at the Rinse House Division 3 Plasma revealed that there is only 1 bathroom for 14 spray and fertilizer workers. Related that, when interview with the Company's PIC revealed that workers still clean themselves (bath) at home because the condition of the rinse house is not adequate.

Based on the observed evidence, the CH has not been able to provide sanitation facilities for workers who use pesticides so that workers can remove PPE, clean themselves and put on their personal clothes. This is a **2022.07 non-conformity**.

6.7.4

UoC provided health services such as clinics and paramedics. Based on field observations, it was known that the facilities and infrastructure provided due to medical services for workers are in proper condition. Based on the documents review and interviews with workers (harvesters, pesticide applicators, mill operators), it revealed that all workers were registered in the BPJS program. The BPJS has been paid for all workers in accordance with the number of total workers in its payment period, proven as follows:

- BPJS (Health Insurance) payments for PT BIA have been fulfilled and the last proof of payment is on 8 July 2022 for period of June 2022.
- BPJS (Social Security Insurance) payments for PT BIA have been fulfilled and the last proof of payment is on 5 August 2022 for period of July 2022.

Based on the interviews with workers (harvesters, pesticide applicators, and mill operators) and labor union, they informed that they had the acknowledgement of their involvement in BPJS program and they also held the BPJS card.

6.7.5

As stated in the OHS Committee report and monthly monitoring of work accidents carried out by the OHS committee secretary, it is known that during 2021 there will be LTA calculations, as follows:

- POM 2, there were 2 work accidents that caused 14 working days to be lost.
- Estate B, there were 9 work accidents that caused 19 days lost.
- Estate C, there were 17 work accidents that caused 46 days lost.
- Plasma, there were 2 work accidents that caused 45 days lost.

Based on review of the management review document, this has been evaluated by the management to mitigate the reoccurrence of work accidents.

6.7.2	Status: The nonconformity has not been met since previous audit and has been raised to the Major category	
6.7.3	Status: 2022.07 non-conformity with major category.	
PRINCIPLE #7 PROTECT, CONSERVE AND ENHANCE ECOSYSTEMS AND THE ENVIRONMENT		
7.1 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.		
<p>7.1.1 The CH has a plan for handling IPM documented in the Annual Work Plan. The plan is detailed in the Monthly Work Plan which will be realized in the Manager Monthly Report. Identification of potential pests listed in the SOP for Plant Pest Control (SOP/KBN/12). The types of pests identified can cause potential including leaf-eating caterpillars, Rats, beetles, grasshoppers and pigs. While the types of diseases identified include: ganoderma, stem rot, marasmius infection and shoot rot. The control method used is a combination of biological, mechanical, chemical and physical control.</p> <p>The CH shows documents related to Pest and Disease monitoring in semester 1 of 2022. For example, the census data of Nettle Caterpillars and the rat of Division 7 Estate C, in February 2022 it was found that the rat attack ranged from 0 - 4%, which means it was still under the control threshold. For Nettle Caterpillars attacks between 0 - 2.3% which means it is still under the control threshold as well.</p> <p>7.1.2 Based on field observation in Estate B and Division 3 Plasma, and interviews with management representatives, it is known that the company does not use invasive species as regulated in the Minister of Environment Regulation No.P.94/MENLHK/SEKJEN/KUM.1/12/2016. From the results of field observations, it is also known that the company uses <i>Turnera subulata</i>, <i>Antigonon leptosus</i>, and <i>Cassia cobanensis</i> for IPM.</p> <p>7.1.3 Based on field observations in Estate A and Plasma Division 1, it is known that there is no use of fire in pest control. Based on interviews with management representatives, it was also found that there was no use of fire in pest control. Biological pest control uses beneficial plants and chemically using a sprayer and by placing it by hand for rat pests if any.</p>		
	Status: Comply	
7.2 Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.		
<p>7.2.1, 7.2.2, dan 7.2.5 The CH has documented the use of pesticides and herbicides and the justification for their use. Based on the results of the review of documents on the use of pesticides in 2022, there was no use of Klerat for rat control. This is due to the occurrence of rat attacks above 5% which are recorded in the census results in semester 1 2021 at Estate C.</p> <p>Based on field observation in pesticides application in Block 39-81 Division 9 Estate B, it is known that they use Roud-up for path spraying. According to PT BIA's pesticide list document, Round up belongs to WHO class U, with an LD₅₀ of 5,000 mg/kg with the register number RI. 01030120001560 and distribution permit until June 11, 2025. The CH has also recorded the use of pesticides per hectare of control, so that the amount of active ingredient per hectare of control can be known. From the results of interviews during field visits, it is known that The CH does not use paraquat again.</p> <p>7.2.3, 7.2.4 Based on review the pest census document in Estate C for the first semester of 2022 revealed that there were no pest attacks above the control threshold. Based on field observations, it is known that The CH has developed beneficial plants on the edge of Collection Road and Main Road, such as <i>Turnera subulata</i>, <i>Antigonon leptosus</i>, and <i>Cassia cobanensis</i>. It was also known that there were no signs of pest attack during field observations to Estate B, C, and Plasma Division 3.</p> <p>The CH has policies related to integrated weed control in the Decree of the Board of Directors number BIA/DIR/25/171221 dated</p>		

December 22, 2017. Some of the things regulated include planting beneficial plants, integrated weed management, and being selective in the selection of pesticides and stopping the use of paraquat. The CH also shows the Decree of the Board of Directors number BIA/DIR/27/200702 dated July 2, 2020 regarding pest control. Some things that are regulated include suppressing the use of chemicals as much as possible, protecting natural predators, breeding predators, applying chemicals as a last step and not as a preventive measure. The use of brodifacum is not justified, unless there is an attack of more than 5% and there is no other alternative. The results of interviews with company representatives, there is no application of pesticides for preventive or prophylactic purposes.

7.2.6

At the time of the audit, no spraying activity was being carried out at Estate C, due to rain. The spray workers in Estate C are employed by wood tripe, while the spray workers in Estate B Division 8 are currently path spraying. Based on interview with the spray workers, it was found that they already knew the technical work according to the procedure, but for self-cleaning at home the rinse was still not carried out properly. This has been discussed in indicator 6.7.3 and becomes a discrepancy in the indicator. Nevertheless, The CH periodically provides spray training. As in Division 4 and 7 Estate C, it will be held on 22 March 2022 with 39 workers and the Foreman participating. Training for Plasma Divisions 3 and 4 which were carried out on September 10, 2021 with 15 participants.

7.2.7

The CH has procedures for storing pesticides in the Hazardous Material Management and Control Procedure (No: SOP/HSE/18, December 24, 2017).

Based on field observations to the company's pesticide storage warehouse, it is known that the storage of pesticides has been carried out according to existing procedures such as material safety data sheet, separate locations from other items and the floor is concrete so it is minimize pollute the environment if there is a spill. Beside that, there is a symbol of toxic hazardous.

7.2.8

Based on field observations at the Chemical Warehouse, as well as interviews with operators in each Plantation and Factory, it is known that used pesticide containers will be stored in temporary shelters for Hazardous and Toxic waste which were built with OHS and environmental aspects in mind. The water used for rinsing will be reused as mixing water for chemical activities.

Based on the results of field visits to residential areas for Estate and POM employees, it was found that there were no traces of used pesticide packaging, for example as water reservoirs or flower pots.

7.2.9

Based on field observations in Estate B, Estate C and Plasma Division 3, it is known that there is no air spraying in pest control. Based on interviews with management representatives, it was also found that there was no use of fire in pest control. Biological pest control uses beneficial plants and chemically using a sprayer and by placing it by hand for rat pests if any.

7.2.10

The CH representative explained that special health checks for high-risk jobs are carried out regularly every year. The last special MCU took place on November 15 - 27 2021, while 2022 is planned for November as well. There is a record of the results of the annual special medical examination for pesticide operators and documented evidence of follow-up on the results of the examination. Cholinesterase and spirometry examinations were carried out for 751 people, including pesticide applicators. The results of the MCU that need follow-up have been followed up with further examinations.

7.2.11

The CH has a Board of Directors Decree (No: BIA/DIR/21/171221, dated 22 December 2017) regarding the Policy for pregnant or lactating women workers. It was explained that pregnant or breastfeeding female workers were prohibited from spraying. Based on field visits and interviews with spraying workers, it was found that none of the spraying workers were pregnant or breastfeeding.

Status: Comply

7.3

Waste is reduced, recycled, reused and disposed of in ways that are environmentally and socially responsible manner.

7.3.1

The company shows identification of waste sources for the 2021/2022 period with details: ex sacks of fertilizer, inner plastic of fertilizer sack, used oil from generator, used neon/lights, wastewater, EFB, Shell, fiber, dash of incinerator, dash of boiler, domestic waste, paper and others.

Sources of emissions include:

- CO₂ Gas: Transportation of FFB, CPO Shipping, Operation of heavy equipment, operation of generator & electric pumps, management of WTP, boilers, laboratory activities, waste ponds and Mill processes.
- Gas NO₂ & SO₂: Activities in the laboratory.
- Gas CH₄: Fertilizing activities and WWTP ponds.

Hazardous and Toxic waste

Hazardous Waste generated by the Estate and Factory will be stored in the Temporary Storage of Hazardous Waste owned, then it will be handed over to a licensed third party which will then be handed over to the licensed Hazardous Waste manager. The company already has a Hazardous Waste Temporary Storage Permit and is still valid for both POM and Estate. Waste TPS Permit Hazardous and toxic materials have been described in indicator 2.1.1.

In terms of transporting hazardous waste, the company already has a permit from the Ministry of Environment and Forestry and the Ministry of transportation. The licenses owned by the company include:

Land Freight Transporter

- Letter of the Director General of Waste, Waste and Toxic and Hazardous Materials Management of the Directorate of Verification of B3 and Non B3 Waste Management of the Ministry of Environment and Forestry to the Director General of Land Transportation of the Ministry of Transportation No. S.661/VPLB3/PPLB3.3/07/2019 dated July 8, 2019 regarding the provision of recommendations for the transportation of hazardous waste for eight (8) units of PT BIA's B3 waste transporting vehicles and their license plates. The Recommendation Letter is valid for five (5) years.
- Decree of the Director General of Land Transportation No. SK.00210/AJ.309/1/DJPD/2019 dated October 18, 2019 concerning Permits for Organizing Special Goods Transport for Transporting B3 by PT BIA. This decree is valid until October 18, 2024.
- Monitoring Card for PT BIA's B3 Transport Operation Permit based on the Decree of the Director of Road Transport a.n. Director General of Land Transportation No. SK.00210/AJ.309/1/DJPD/2019 dated October 18, 2019. Types of B3 waste permitted to be loaded include used batteries, clinical waste, used B3 packaging, used lubricating oil, electronic waste, used filters, used majun, and others according to the recommendations of the Ministry of Environment and Forestry. The delivery destination is Merauke Port and PT BIA Special Terminal (Tersus) in Boven Digoel, with the route Merauke - Trans Papua - Merauke Port - Asike / Boven Digoel. The validity period of the decision is valid until October 18, 2024.

Sea Freight Transporter

- Letter of the Director General of Waste, Waste and Toxic and Hazardous Materials Management of the Directorate of Verification of B3 and Non B3 Waste Management of the Ministry of Environment and Forestry to the Director General of Sea Transportation of the Ministry of Transportation No. S.905/VPLB3/PPLB3/PLB.3/8/2019 dated 22 August 2019 regarding the Recommendation for Sea Transportation of B3 Waste from PT Salam Pacific Indonesia Lines. The Recommendation Letter is valid for five (5) years.
- Cooperation agreement letter between PT BIA and PT Salam Pacific Indonesia Lines No. 0268/SPIL.BIA/PJ/III/2022 regarding Sea Transportation LB3 on March 18, 2022 and valid until December 31, 2022.

The company has and can show documents that can prove that B3 waste is only sold/transferred to parties who have permits from the Ministry of Environment and Forestry, and the Director General of Transportation through proof of B3 Waste Manifest documents on behalf of PT Primanru Jaya, PT Salam Pacific Indonesia Lines, PT Bekasi Industrial Waste Processing and PT Non ferindo Utama. The following are some examples of manifest data from the transportation carried out on May 12, 2022 which was transported by vehicle numbered DS 9036 GC (PT BIA), SPIL Hana Ship (PT SPIL), B 9039 NEH (PT Primanru Jaya), among others:

- Oil Filter as much as 0.116 Ton with Manifest KLHK-1658518012
- 0.065 Tons of Medical Waste with Manifest KLHK-1661418005
- Air filter as much as 0.116 Ton with Manifest KLHK-1661437281
- 1.02 tons of contaminated packaging with Manifest KLHK-1661728078

- Used battery as much as 0.034 Ton with Manifest KLHK-161729032

Solid Waste

The solid waste produced by the company is shell, fiber and EFB. The management plan is carried out by reusing solid waste such as shells and fiber to be reused as boiler fuel. Meanwhile, solid waste such as EFB is reused by applying it to plantation areas. This is evidenced by the results of field visits during audit activities that the company has utilized shells and fiber for boiler fuel, while EFB has been reused for plantation land.

POME

POME generated from the factory is reused for Land Applications. Before being channeled to LA, POME is first managed at the WWTP with the aim that the quality of POME that is flowed to LA is in accordance with the provisions. This is evidenced by the results of field visits at WWTPs, it is known that before being distributed to LA, POME is first transported to WWTPs.

Domestic Waste

Domestic waste generated from housing and offices will be disposed of in Landfills. This is evidenced by the results of field visits to the Landfills area that the domestic waste generated will be placed in landfills. In addition, the location of landfills is far from residential areas and water sources.

Based on the results of interviews with representatives of the Mahuze Milafo clan, there is an issue of environmental pollution carried out by the company, namely the spilling of POME on the Land Application in Block 33-71 Estate B. This has been confirmed to the company and the company is aware of the issue. The company can show the Minutes of the overflow of the Land Application on March 3, 2022. This is due to the negligence of the officer in opening the LA pipe faucet (Ball Valve). The company has made repairs by closing the broken roak, blocking the flow of the ditch so that the waste water does not flow into the ditch, sucking the wastewater that enters the ditch, and making an emergency roak in the last LA pond.

Based on the results of field visits to the IPAL POM 2 area, it is known that in conveying Liquid Waste (POME) from POM to Estate, the company uses pipes to drain the POME. The results of field observations in the LA Blocks 31-69, 30-74 and 33 70 Estate B showed that there is a pipeline that crosses the ditch before it flows into the rorak in the Estate. In addition, in the LA area, there is a rorak for POME application and 3 rorak is emptied in anticipation of overflow. During the field visit, there were no indications of spillage or environmental pollution by the company.

The company also has a Waste pool maintenance work program and LA Block monitoring, namely by stockpiling embankments, assembling pumps for pool washing, maintenance/repair of pump machines, dredging mud in ponds, maintaining embankments in ponds, and monitoring Land Application Blocks. Companies are encouraged to ensure that the waste pond and LA Block maintenance work program is consistently implemented so that POME overflow incidents in the LA area do not occur again. (OFI)

7.3.2

Based on document verification and the results of field observations, the following evidences were obtained:

- The company has identified the waste generated from the factory and plantation activities. For example, the identified wastes are as follows:
 1. Used fertilizer sacks (Plastic Fertilizer) are included in the category of used hazardous packaging.
 2. The former thinner packaging is included in the category of packaging contaminated with hazardous waste.
 3. Used pesticide packaging is categorized as Hazardous used packaging.
 4. Used paint packaging is included in the category of Hazardous contaminated packaging
 5. The used oil drum is included in the category of hazardous contaminated packaging
 6. Domestic household waste is included in the category of Non-hazardous waste.
- The SOP for handling and managing Hazardous Waste with Number SOP/HSE/20 dated December 24, 2017 explained that all hazardous waste should not be disposed of but should be handed over to companies that already have a permit. In addition, all waste generated by PT BIA's activities will be temporarily accommodated/collected in special places according to their respective

types, including clinical waste. Non-hazardous waste will be sent to a collection facility for recycling and can be disposed of by dumping it in a designated final disposal site. For hazardous waste placed in the Temporary Storage of Hazardous Waste.

- The results of field observations at Landfills Block 27-72 Estate B revealed that there were used drums, used oil packaging, used Tinner packaging mixed with domestic waste in the Landfills.
- The results of field observations at the Employee Housing Division 3 Estate B revealed that there were 3 pieces of used paint packaging in the housing.
- The results of field observations at the WWTP Pump House POM 2 found that there were used drums and used oil packaging inside the WWTP pump house.
- The results of field observations at Landfills Block 36-51 Estate C revealed that there were plastic fertilizers, used pesticide packaging, and used paint packaging in the Landfills mixed with Domestic Waste.
- The results of field observations in Block 41-47 Plasma 2 Division 3 revealed that there are plastic fertilizers that are not placed in the Temporary Storage of Hazardous Waste.

Based on this explanation, the company has not been able to show evidence that the waste disposal is in accordance with the procedures it has. **NCR No 2022.08 with Minor Category**

7.3.3

Based on document verification and the results of field observations, the following evidences were obtained:

- The SOP for Handling and Management of Hazardous and Toxic Waste Number SOP/HSE/20 dated December 24, 2017 explained that the destruction of Non-Hazardous and Toxic (Non-Hazardous) waste should not be burned because it will cause air pollution.
- Based on the results of field observations at POM 2 Housing, it was found that there were 2 burn marks of domestic waste in the housing area.
- Based on the results of field observations at the Plasma Division 4 Housing, there were traces of domestic waste burning in the housing area.

Based on this evidence, there is still domestic waste management by burning which is not in accordance with the procedures that have been owned by the company. **NCR No 2022.09 with Minor Category.**

7.3.2	Status: NCR No 2022.08 with Minor Category
7.3.3	

NCR No 2022.09 with Minor Category

7.4

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

7.4.1

The CH has an SOP to manage soil fertility in order to optimize yields, which has not changed since the previous audit, namely:

- Immature Plant Care SOP (SOP/KBN/05)
- SOP for Producing Plant Care (SOP/KBN/06)
- Plant Fertilization SOP (SOP/KBN/07)

The implementation and monitoring of SOP can be seen from the monitoring of fertilization work by each division while monitoring the results of the fertilizing performance is carried out by the agronomics section on quality control.

7.4.2

Soil and leaf sampling is done annually as a basis for fertilizer recommendations. The Soil and Leaf Sample Test was last carried out for the preparation of the 2020 fertilizer program conducted by the Central Plantation Services Laboratory of PT Central Alam Resources Lestari.

The results of the study of soil and leaf analysis documents, it is known:

- Latest leaf analysis in estate B, carried out on October 18, 2021, a number of 121 samples, with test parameters N, P, K, Mg, Ca, and B.
- The latest soil analysis in estate B, carried out on November 20, 2020, a number of 11 samples, with test parameters of particle size, N elements, C Organic, pH, etc.
- Latest leaf analysis in estate C, carried out on October 18, 2021, a number of 100 samples, with test parameters N, P, K, Mg, Ca,

and B.

- The latest soil analysis in estate C, carried out on December 20, 2019, a number of 30 samples, with test parameters of particle size, N elements, C Organic, pH, etc.
- Latest leaf and soil analysis in Plasma, carried out on November 24, 2020, a number of 24 samples for leafs and 6 samples for soil.

7.4.3

The company has a recording strategy for nutrient recycling which includes the use of EFB applications, palm oil mill effluent application, shell, fiber and boiler ash. Based on the results of the document review, it is known that the application of EFB in July of 2022 for Estate B and C is 5,424 Ton. The EFB applied between plants. In addition EFB is also used as mulch for the planting of beneficial plants.

7.4.4

The CH has maintained a record of the application of fertilizers that have been applied. For example in Estate B, the application for NPK 13 in 2021 is 5,202 tons from the planned 6,152 tons. As explained by the management representative, this was due to the delay in the arrival of fertilizer. The fertilizer shortage will be resolved by 2022.

Status: Comply

7.5

Practices minimize and control erosion and degradation of soils.

7.5.1, 7.5.2, 7.5.3

The CH has maps that identify marginal and fragile areas, topographic maps that explain land slopes and maps of peat areas. The map is used to identify areas that are not suitable for planting. Based on general field observations, it is known that the area in PT BIA is predominantly flat. There is no steep area planted with oil palm.

At the time the audit is carried out, the CH did not have plans to carry out replanting activities. The oldest age of a palm oil plant in the company's operational area is 8 years (PY 2014). At the time of the audit activity, there were no new planting activities in the area of the company's management. Based on the topographic map shown also concluded that there is no steep slope land in the company area. The dominant corporate management area is flat and bumpy. From the results of field observations to Estate B, Estate C, and Plasma Division 3, it is also known that there is no new planting and replanting carried out by the company.

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

The CH has a soil survey that identified the type of soil. The company maintains a map that identifies marginal and fragile areas, a topographic map describing the slope of the land and a map of the area PT BIA. Beside that, this map's information is used by the company in the development of oil palm plantations which are now underway such as the establishment of road, bridge, trench and other infrastructure. There is no peat soil type in the area managed by PT BIA.

Based on Soil Survey and Land Suitability Evaluation PT BIA, it is known that PT BIA concession is situated less than 100 meters. The dominant elevation is 40-60 meter above sea level covering nearly the entire area. Areas with 60-68 meter above sea level elevation is found in the north and west parts of Estate A. Slope in PT BIA is around 3-15% with dominant slope class of 8-15%. Based on field observations at Estate B, Estate C, and Plasma Division 3, it is known that the area in PT BIA is predominantly flat. There is no steep area.

7.6.3

Based on field observations in Estate B, Estate C, and Plasma Division 3, it is known that land survey information and topography serve as a guide in planning drainage and irrigation systems, roads, and other infrastructure. With these considerations, the arrangement of waterways will mitigate the risk of flooding, the arrangement of roads to adjust the topography so as to facilitate access to FFB to POM.

Status: Comply

7.7
No new planting on peat, regardless of depth after November 15th, 2018 and all peatlands are managed responsibly.
7.7.1 – 7.7.7

The CH has a Soil Map by Aksenta on October 2018, which has not changed from the previous audit. Based on that document, it is known that soil type namely Oxic Dystrudepts, Typic Hapludults, Typic Plintudults, Aquic Hapludults, Psammentik Dystrudepts and Typic Dystrudepts. There is no peat soil type in the area managed by PT BIA.

Based on field observations at Estate B, Estate C, and Plasma Division 3, it is known that the area in PT BIA is dominantly flat. There is no peat area.

Status: Comply	
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7.8
Practices maintain the quality and availability of surface and ground water
7.8.1

The company has implemented a water management plan consisting of:

- Do not apply chemicals in river border areas
- Not disposing of liquid waste into rivers but reusing it to plantation land. Before being used, the liquid waste must be managed at the WWTP so that the quality meets the standards set by the government.
- Utilizing water for factory processing in accordance with the standards set by the company.
- Conduct river water quality testing.

Based on field observations through the Ngab River Border HCV area Blok 39-66 Estate B, it can be seen that the company has managed water sources by installing signboards as HCV areas and markings on oil palm trees as spray boundaries.

The company can show the results of river water quality testing in accordance with PP Quality Standard No. 22 of 2021 for class III water and clean water quality in accordance with Minister of Health Regulation No. 32 of 2017. The company can show the results of water quality testing carried out on rivers in and around the PT Bio Inti Agrindo plantation concession area every 6 months, namely the Bian River (inlet, middle, outlet), Kukumit River, Division IV Estate River A or Loo tributary (outlet), Division I Estate River A (inlet) or mill tributary, Division III Estate River A or Mill tributary (inlet and outlet), Mandom River, Mandom River tributary, and borehole water Estate A.

Based on the results of testing the quality of surface water and clean water, it is known that all test parameters are in accordance with the quality standards stipulated in PP No. 22 of 2021 (surface water) and Permenkes 32 of 2017. In addition, as a form of preventive action in environmental management and monitoring to prevent and reduce the concentration of parameters that are not in accordance with quality standards, the company has ensured best practices in waste management by how to ensure that no waste flows directly to the environmental agency, ensure that domestic liquid waste is managed by providing a septic tank and several management activities in accordance with the company's management plan.

The results of observations and interviews with workers show that the company has also provided access to clean water for workers by providing hygienic water for drinking and water for daily needs.

7.8.2

Wet streams in the company area are protected by the company. This is evidenced by the results of field observations in the HCV area of the Ngab River Border Block 39-66 Estate B, it is known that the river border is protected by the company. Some of the activities carried out by the company are placing signs as limits for chemical application and planting white teak plants. In addition, there are no traces of chemical applications on the river border.

7.8.3

The company can show a document of the results of measuring the quality of liquid waste that is applied to the land, namely the document of the results of testing liquid waste for the period January 2021 - June 2022. The test is carried out by a KAN accredited laboratory (LP-1342-IDN) using quality standards that refer to the Minister of Environment Decree Number 28 2003. Based on the analysis of the test documents, it shows that all the parameters tested are in accordance with the applicable quality standards. For example, the test results in the period February 2022 with the results of BOD 2,119 (BM: <5,000) and pH 7.31 (BM: 6-9) and June 2022 with the results of BOD 2,865 (BM: <5,000) and pH 7.05 (BM: 6-9). In addition, the test results in the period December 2021

with the results of BOD 2,208 (BM: <5,000) and pH 7.61 (BM: 6-9).

Based on the results of observations in the LA area, namely in Blocks 7-19 Estate A and Block 30-74 Estate B, it is known that the flat bet condition has no indication of leakage. In addition, the location of the liquid waste application is in accordance with the permit it has. For Land Application licensing, it is explained in indicator 2.1.1.

There is content of environmental pollution carried out by the company, namely the issue of overflowing POME on Land Applications in Block 33-71 Estate B. This issue was obtained from the results of interviews with representatives of the Mahuse Milafo clan. This has been confirmed to the company and the company is aware of the issue. The company can show the Minutes of the overflow of the Land Application on March 3, 2022. This is due to the negligence of the officer in opening the LA pipe faucet (Ball Valve). The company has made improvements by closing the broken roak, damming the flow of the ditch so that the wastewater does not flow into the ditch, sucking the wastewater that enters the ditch, and making an emergency roak in the last cola of LA and this has been known by the Merauke Regency Environmental Service with verify directly in the field. The company can also show documentation of an agreement to resolve the LA Ball Valve leak in Estate B with indigenous peoples and clans who own customary lands on March 5, 2022. The settlement points are as follows:

- Socialization was carried out to the Mahuse Milafo and Kewam clans regarding the CPO production process starting from FFB entering to factory waste water entering the WWTP pond to LA.
- Conducted outreach to the community regarding the process of testing factory wastewater.
- Elimination of points must get recommendations from several clans for people who will work in Estate B.
- A fine of one hundred million rupiah.

All of these points have been implemented by the company, for example the company can show the minutes of socialization to the Mahuse Milafo and Kewam clans regarding the results of the wastewater test and the CPO production process, as well as the handover of the customary fine of one hundred million rupiah which was carried out on 19 May 2022 to the Deputy Head of the clan Mahuse Milafo.

7.8.4

The company can show the results of the recapitulation of water use for the period January 2021 – July 2022, namely:

The use of water for FFB processing is 651,479 m3 with an average use of water for FFB processing every month is 54,289 m3. The data shows that the company uses surface water that has complied with the quota specified in the permit.

POM 2 Water Resources Concession Permit in accordance with the Decree of the Minister of Public Works and Public Housing Number 576/KPTS/M/2021 on 10 May 2021 with a validity period of 5 years. The water intake location is on the Isau River with a maximum discharge of 27.8 liters/second or equivalent to 72,000 m3/month.

The company can also show proof of payment of the surface water levy for the July 2022 period to the Regional Revenue Management Agency of Papua Province on August 25, 2022 (POM 1 and POM 2) and the payment has been in accordance with the surface water tax bill from the Regional Revenue Management Agency of Papua Province.

Status: Comply

7.9

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

7.9.1

The plan to increase the efficiency of the use of fossil fuels and optimize the use of renewable energy by the company is to use shells and fiber as boiler fuel which is used to generate turbines to generate electricity. The use of energy generated from the turbine is monitored every day.

POM 2 has an Energy efficiency document for the period August 2021 – July 2022 for the use of fossil fuels or the use of renewable fuels. The calculation of efficiency with the use of fossil fuels for the period August 2021 – July 2022 is concluded as follows: FFB Processed as much as 462,140 tons using renewable fuels such as shells of 15,158 tons and Fiber as much as 57,126 tons. The turbine produced from the use of Shell and Fiber is 11,068,672 Kwh or 23,95 Kwh/Ton FFB, while the generator used is 179,021 Kwh. The efficiency of renewable energy used by the company is 97%.

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

The company also has conducted GHG emission calculations period 2021 use of Calculator Palm GHG version 4.0. Accurate data has been put into the RSPO PalmGHG Calculator (Palm GHG version 4.0) and has been verified. Summary of net GHG emissions from PalmGHG calculator of the audit report which calculation option is applied "Apply full Version".

Summary of Net GHG Emissions

Emission per product	tCO ₂ e/tProduct
CPO	2.47
PK	2.47

Production	t/yr
FFB processed	456,060.20
CPO produced	106150
PK produced	15861

Extraction	%
OER	23.28
KER	3.48

Land use	Ha
Planted area on mineral	24715.02
Planted on peat	0.00
Total area planted	24715.02
Conservation Area (Forested)	6610.54
Conservation Area (Non-Forested)	0.00
FFB Production per hectare	27.01

Summary of field emission and Sinks

Description	Own crop		Group		3 rd Party	Total
Emissions Sources	tCO ₂ e	tCO ₂ e/ tFFB	tCO ₂ e	tCO ₂ e/ tFFB	tCO ₂ e	
Land conversion	403564.88	0.89	0.00	0.00	0.00	403564.88
CO ₂ emissions from fertilizer	14206.74	0.03	0.00	0.00	0.00	14206.74
NO ₂ emissions from peat	0.00	0.00	0.00	0.00	0.00	0.00
NO ₂ from Fertilizer	9532.32	0.02	0.00	0.00	0.00	9532.32
Fuel consumption	7457.75	0.02	0.00	0.00	0.00	7457.75
Peat oxidation	0.00	0.00	0.00	0.00	0.00	0.00
Sinks						
Crop sequestration	-183356.06	-0.40	0.00	0.00	0.00	-183356.06
Sequestration in Conservation area	-57867.79	-0.13	0.00	0.00	0.00	-57867.79
Total	193537.84	0.42	0.00	0.00	867.58	194405.42

Summary Oil Mill Emissions and Credits

Remarks	tCO ₂ e	tCO ₂ e/t FFB
Emissions sources		
POME	105991.10	0.23
Fuel consumption	517.54	0.00

Grid electricity	0.00	0.00
Credits		
Export of grid electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	106508.64	0.23

Palm Oil Mill Effluent (POME) Treatment

Divert to compost (%)	0
Divert to anaerobic digestion (%)	100

POME Divert to Anaerobic Digestion

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

The auditor team has verified the GHG palm that has been carried out by the company. Based on the verification results, it is known that the GHG palm input data is in accordance with the actual conditions. This is evidenced by the results of verification of the amount of FFB production from Estate A, Estate B, Estate C, and Plasma 2, the planted area of Estate A, Estate B, Estate C, and Plasma 2 and the distribution of planting years, as well as the area of HCV. GHG emissions in 2021 are higher than in 2020. However, the increase in emissions is not significant. This is because in 2021 FFB Process more than in 2020.

7.10.2

The company has conducted a carbon stock assessment conducted in February 2018 by Aksenta Consultants. The study was conducted in the HGU area of PT BIA with an area of 34,255.2 Ha. The results of the study stated that the total carbon stock in the HGU area of PT. BIA is 5,206.8 kilo ton-C with soil carbon stock as the largest contributor to total carbon stock in the HGU area of PT. BIA. The value of carbon stocks for each strata of cover becomes one of the factors for calculating net GHG emissions which is then used as a baseline for assessing the success of mitigation practices in sustainable management of oil palm plantations.

The company has carried out GHG calculations as described in indicator 7.10.1 but not the RSPO GHG for new developments. The company did not do NPP and has been sanctioned for 3 years.

7.10.3

Based on document review and interviews with company representatives, it was found that there were no new developments. The company has identified the source of pollution in POM and Estate, the document informs the source (station/activity), source of pollution and emission, impact (human, work equipment, environment) and impact control. For example, from the boiler it produces boiler ash, steam and chemical pollution, from the engine room it produces pollution in the form of noise.

Efforts to reduce pollutants carried out by the company include:

- Monitoring air quality and emissions from boilers and generators
- Carry out liquid waste management in WWTPs before being used in plantations
- Perform regular machine maintenance.
- Optimizing the use of fertilizers according to recommendations
- Use of fiber and shells in PKS to reduce diesel fuel.

The company has tested emissions from boilers and generators, as well as ambient air quality which was carried out in semester 1 of 2022 by a KAN accredited laboratory (LP-1342-IDN). Based on the results of the document review, it is known that the results of the tests carried out are in accordance with the provisions set by the Government.

Status: Comply

7.11

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

7.11.1

The company has issued a Decree of the Board of Directors Number: BIA/DIR/03/171221 concerning Zero Burning in which the company does not open plantations or cultivate land by burning and a Decree of the Board of Directors Number: BIA/DIR/04/171221 concerning the prohibition of clearing land by burning. This is evidenced by the SOP for Land Clearing and Preparation (SOP/KBN/01) which is a requirement that the company does not clear the land by burning the land.

Based on the results of field observations during the audit activity, it is known that there is no indication of land burning by the company.

7.11.2

In determining land fire prevention and control measures, the company carries out several activities, namely:

- Fire emergency response simulation training for employees, for example on 10 June 2022, 14 May 2022 and 27 May 2021, which was attended by the Estate and Factory Fire Task Force.
- The company has an emergency response team to handle fire emergencies. The company already has an emergency response team for every estate and factory.
- Have facilities and infrastructure for emergency response prevention and management of land fires.
- Conducting socialization of land fires to the surrounding community, for example on August 23, 2022 which was attended by 84 participants from the employees and the community of the Mahuse Milafuh
- Monitoring land fires through fire patrols and through fire towers and drones that are carried out every day. For example, the results of fire monitoring for the January 2022 period revealed that there were no hotspots in the company area.

The auditor team has also conducted fire control simulations for the fire task force team at Estate A and tested the company's fire control facilities and infrastructure. The simulation results show that the Company's fire task force team can run the simulation well and firefighting equipment can be used at any time.

7.11.3

The company has also involved stakeholders in adjoining locations for fire prevention and control measures by conducting socialization of land fire control to the community and employees, for example on August 23, 2022, which was attended by 84 participants. The results of interviews with community representatives from Selil and Mandekman villages revealed that the company had socialized fire control to the community. In addition, in the company area there is also a signboard prohibiting land burning activities and the dangers of land fires.

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 and 7.12.8

Land clearing in the PT BIA concession area began in 2012 after obtaining the HGU. In 2015 the company conducted an HCV assessment through a licensed independent team. The company has disclosed land clearing without a previous HCV assessment on 16 January 2018 and updated it in February 2020. The results of the LUCA review show that PT BIA has an obligation and must follow the RaCP process. The company can show the LUC Analysis of PT Bio Inti Agrindo's Documents carried out by PT Hijau Daun with a total area of 34,194.52 ha of Legal HGU management unit area. The report has been declared PASS by the RSPO (khing.suli@rspo.org) on August 13, 2020 with a FCL summary of 35,352.45 and Remediation of 434.21 Ha.

The company has sent the RaCP Plan to the RSPO and the RaCP plan has been received/RSPO Satisfactory according to the email from RSPO (alicia@rspo.org) on 21 July 2021 stating that the Satisfactory evaluation results of the compensation plan, the RaCP process for PT BIA is Now Completed.

7.12.2

Land clearing in the PT BIA concession area began in 2012 after obtaining the HGU. In 2015 the company conducted an HCV assessment through a licensed independent team. The HCV assessment report has been submitted to the HCV-ALS assessment team for quality review in 2016, however the results of the review have not been satisfactory/not yet received. Land clearing continued from 2016 to 2017. The improved HCV assessment report was again submitted to the HCV-ALS assessor for quality review starting from 2017 to 2019 with the final result still unsatisfactory/not received. In addition to this, the company has completed land clearing

until 2018 and there are no plans to open new land in 2018 and in the years to come in the company's concession area.

Then the Company conducted a re-assessment of HCV with the independent assessor Ecologica Consultant on January 22 to May 15, 2020. In July 2020 the HCV assessment conducted by the company was approved by the HCV-ALS assessment team and was deemed satisfactory/Accepted. And because the company has not cleared new land since 2018 (15 November 2018) within its concession area, the company is not required to assess the presence of HCS (High Carbon Stock).

Based on the results of the HCV identification carried out, there are an area of 2,695 Ha in the Core (Estate A, B, and C) and 4,023.3 Ha (Plasma) consisting of HCV1, HCV2, HCV3, HCV4, HCV5 and HCV 6. calculation of the HCV area of each Estate unit. The HCV area of each estate is as follows:

- Estate A with an area of 223.28 Ha
- Plasma 1 area of 107.76 Ha
- Estate B with an area of 2,283.68 Ha
- Estate C covering an area of 2,343.2 Ha
- Plasma 2 covers an area of 1,760.37 Ha.

7.12.3

Based on the notice on the RSPO website it is known that the High Forest Cover Landscapes and High Forest Cover Countries have not been established by the RSPO. So that this standard has not yet been assessed.

7.12.4

The company already has an HCV program based on the recommendations from the 2020 identification assessment conducted by Ecologica Consultants in 2020. The HCV program will be evaluated annually. The plan contains a plan for management, monitoring, time management and the person in charge of implementation. The HCV management matrix describes the management plan consisting of:

- Establish spray boundary markers along riverbanks and keep plants growing naturally
- Maintaining the integrity of animal habitats along river borders
- Installing warning signs for river border maintenance
- Install no hunting signboard
- Socialization of RTE species that need to be protected
- Animal patrol in HCV area
- HCV security patrol
- Application of land-based soil and water conservation, such as making terraces and rorak
- Collaboration and cooperation with the community, government and NGOs related to river conservation and protection programs.
- Enrichment of degraded riverbanks of vegetation.
- Install a boundary fence around the sacred/sacral place.

The company has not carried out a 5-year review of the management of high conservation value areas because the HCV management and monitoring plan used is the result of the recommendations from the HCV assessment conducted in 2020.

An integrated management plan has been developed in consultation with relevant stakeholders and includes directly managed areas and broader and relevant landscape level considerations. This is evidenced by the company's HCV management plan which was developed by involving stakeholders such as the surrounding village community and employees (during the 2020 HCV identification activity). Management activities planned by the company also include areas that are managed directly and take into account the wider landscape such as maintaining the existence of the Kalibian River and Bian Lake Wildlife Reserve which are outside the Company's HGU, anticipating land fires in the company area and in the area around the company, increasing knowledge employees and the community by conducting socialization of HCV.

The company can show some implementation of the HCV management and monitoring plan for the period 2021, for example:

- HCV socialization including animal and plant protection to the community from the Mahuse Milabuh and Kewam clans was held on November 25, 2021.
- HCV socialization including animal and plant protection to employees of Estate A, Estate B, and Estate C which was held on

February 9, 2022.

- Monitoring of sacred land in the PT BIA Area in Division 3 Estate A which was carried out on November 18, 2021.
- Routine maintenance of the White Teak Tree in the Green Open Space on November 26, 2021.
- The results of monitoring (field observations) of plant and animal species for the first semester of 2022, it is known that animal species are protected based on PermenLHK No. 106 of 2018 for example *Kanguru abu-abu* (*Thylogale brunii*), *Kuskus Selatan* (*Phalanger intercastellanus*), *Kuskus Tota* (*Spilococus maculatus*), *Kura-kura moncong Babi* (*Carettochelys insculpta*), *Buaya Muara* (*Crocodylus porosus*), *Buaya Air Tawar* (*Crocodylus novaeguineae*). while the protected plant species is *Gaharu* (*Aquilaria macrophyllus*).
- Monitoring of HCV Boundary Maintenance carried out on 9 December 2021 at Estates A and C.
- Monitoring of the HCV Signboard in the Plasma area carried out on November 25, 2022.
- Observation of the Timber Population inside the Block 37/48 Measurement Plot which was carried out on October 4, 2021. The measuring plot is a location built by the company for measuring and collecting data on potential forest biomass and carbon.

7.12.5

The company has identified HCV which was carried out by Ecologica Consultant on January 22 to May 15, 2020. The HCV assessment was carried out by involving the community. There is also a meeting of stakeholder representatives from the surrounding community, namely:

- On February 3, 2020 meeting with the Kindiki community,
- On 6 February 2020 a meeting with the Manda community
- On February 7, 2020 meeting with the Mandekman community
- On February 4, 2020 meeting with the people of Selil

This is done to ensure that there is no reduction in community rights in the identified HCVs and to encourage community involvement in the maintenance and management of conservation areas.

7.12.6

The company has a program to educate the workforce about RTE species status. The program is also included in the Company's HCV management plan. The program includes activities to increase knowledge and skills (for all staff and plantation employees, especially special officers in charge of managing HCV/HCV and monitoring important species, especially endangered species).

The company routinely conducts socialization to the community and workers in the company regarding the existence of endangered plants and animals, which is carried out in conjunction with the socialization of HCV areas, for example:

- HCV socialization including animal and plant protection to the community from the Mahuse Milabuh and Kewam clans will be held on November 25, 2021.
- HCV socialization including animal and plant protection to employees of Estate A, Estate B, and Estate C which was held on February 9, 2022.

Based on the results of interviews with harvesting and spraying officers at Estate A, it is known that the company prohibits workers from keeping protected animals and plants and is prohibited from catching, hunting and killing animals as well as prohibiting the destruction of HCV areas.

7.12.7

The company can show the evaluation record for 2021. The results of the evaluation of monitoring the status of HCV and RTE species in 2021 which were carried out on December 20, 2021, are:

- The implementation of HCV management and monitoring at PT Bio Inti Agrindo throughout 2021 has been carried out and these activities have been well documented.
- For signboards for protected areas on river borders, improvements will be made to serve as a warning that the area has been managed and as a sign of the existence of a protected area.
- All employees and the community in the company area join together to form a protected area/HCV in the company area.

Based on the results of the evaluation, it is known that the implementation of HCV area management is going quite well. The follow-up to the evaluation results is used as input for the management and monitoring of HCV areas in the next period. The results of

interviews with the company's PIC, the results of the evaluation carried out will be used as input for the implementation of monitoring HCV and RTE Species for the next period.

Status: Comply

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	PT Bio Inti Agrindo do not use RSPO trademark and CB Logo.	✓
	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	PT Bio Inti Agrindo do not use RSPO trademark and CB Logo.	✓
	Status: Comply	
3.	Implementation of Certificate and Trademark is not used on product	X or ✓
ASA-1	PT Bio Inti Agrindo do not use RSPO trademark and CB Logo.	✓
	Status: Comply	
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.	X or ✓
ASA-1	PT Bio Inti Agrindo do not use RSPO trademark and CB Logo.	✓
	Status: Comply	

3.3 Summary of RSPO Partial Certification.

All Management units of PT Bio Inti Agrindo (POM 1 and POM 2) plan for certification in 2020 and include in this scope of certification.

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 IC Audit

NCR No.	: 2020.01	Issued by	: Satria Adi Putra
Date Issued	: 21 October 2020	Time Limit	: Surveillance 1
NC Grade	: Non-Critical	Date of Closing	: 22 December 2020
Standard Ref. & Requirement	: 1.1.2 Information is presented in an appropriate language and accessible to relevant stakeholders		
Evidence observed (filled by auditor): Based on the results of the document review and interviews, it is known that: <ul style="list-style-type: none">- Regulation of the Minister of Manpower No. 100 of 2004 concerning the provisions for the implementation of a certain time work agreement (PKWT) Article 13 states that the PKWT must be registered by the entrepreneur to the agency responsible for manpower affairs at the local regency/municipality no later than 7 (seven) days after signing.- The results of the interview with the Papua Province Manpower Supervisory Agency revealed that the company has not submitted the latest report on the use of PKWT workers- The results of the study of the company's employee list document revealed that there were 463 PKWT employees at Estate B, 236 PKWT employees at Estate C, and 58 PKWT employees at the factory.			
Non-Conformance Description (filled by auditor): The company has not been able to show evidence that reports on the use of PKWT workers have been presented and accessed by relevant stakeholders.			
Root Cause Analysis (filled by organization audited): PKWT report has not been listed in the Mandatory Document Requirements Form for the Government, so the report has not been reported			
Root Cause Analysis (filled by organization audited): PKWT report has not been listed in the Mandatory Document Requirements Form for the Government, so the report has not been reported			
Corrective Action (filled by organization audited): 1. Evidence of reporting PKWT workers to the Merauke Regency Manpower and Transmigration Office 2. HR Work Program 2021 3. Mandatory Document Requirement Form for the Government			
Assessor Evaluation and Conclusion (filled by auditor): Verification December 14, 2020 The company has shown corrective documents including recordings of reporting PKWT workers to the Head of the Manpower and Transmigration Office on November 3, 2020 (No. BPHNL-Pel/HRD-PKWT/XI/2020-A) and received by the Office on November 26, 2020. However, the auditor still requires verification of the corrective action submitted by the auditee, regarding this matter, the non conformity No. 2020.01 is declared unfulfilled.			
Verification December 22, 2020 The company has shown evidence of additional improvements including: <ul style="list-style-type: none">- The HR Work Program 2021 document which regulates the planning for the mandatory monthly reporting of PKWT workers and the PIC of the person in charge- List of Mandatory Reporting Data Needs to Related Offices along with the form used Based on the data above, it can be concluded that the non conformity No. 2020.01 is declared to have been fulfilled.			

Verified by	:	Satria Adi Putra
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NCR No.	:	2020.02	Issued by	:	Satria Adi Putra
Date Issued	:	21 October 2020	Time Limit	:	20 October 2021
NC Grade	:	Critical	Date of Closing	:	5 December 2020
Standard Ref. & Requirement	:	6.2.4 The unit of certification provides adequate housing, sanitation facilities, water supplies, medical needs, education and public facilities in accordance with national standards or higher standards, if public facilities are not available or cannot be accessed. In the acquisition of non-certified units, a plan that describes in detail the infrastructure improvement is developed. Given a reasonable time (5 years) to upgrade the infrastructure.			
Evidence observed (filled by auditor): Based on the results of field visits: <ul style="list-style-type: none"> - The company has provided facilities such as housing, mosque/chapel, daycare, market, and public toilet. - In Plasma Division 2, there are 2 of 3 public toilet buildings in dirty condition, the toilet is clogged, and water in drain is stagnant. Based on the results of document review: <ul style="list-style-type: none"> - Procedure for maintenance of company facilities and infrastructure No SOP/HRD/12 dated December 24, 2017 mentions that all employees are required to maintain the facilities and infrastructure owned by the company for which is their responsibility. - The company has conducted monitoring in July-August 2020, however the corrective action has not been carried out. Non-Conformance Description (filled by auditor): The company has not been able to show evidence that the sanitation facilities are in a condition in accordance with applicable health standards.					
Root Cause Analysis (filled by organization audited): <ol style="list-style-type: none"> 1. SOP for Maintenance of Facilities and Infrastructure No SOP/HRD/12 dated December 24, 2017 states that maintenance is carried out by the HRD and General Department, but in practice it is not appropriate and is carried out by the General Department of BSO (Business Support Office). Monitoring activities for buildings and progress of repairs are not set in exact time so that maintenance is carried out every two months, this is because the BSO Department is responsible for monitoring and reporting the progress of all buildings at PT Bio Inti Agrindo so that the results of monitoring and progress reports are not good. 2. At the time the audit was carried out, monitoring activities and progress reports for improvements had not yet been carried out. 					
Correction (filled by organization audited): <ol style="list-style-type: none"> 1. Revise the SOP for the Maintenance of Facilities and Infrastructure: <ul style="list-style-type: none"> - The responsibility for monitoring for the Division which was previously assigned to the Divisional Assistant by the General Department of BSO; - Responsibility for Maintenance and Progress Reports is carried out by the General Department in each Estate (not centralized in BSO). - The time for monitoring and reporting progress is made every month. 2. Improve sanitation and public toilets in Division 2 Plasma 3. Monitoring the progress of the improvement of facilities and infrastructure for the Plasma Division 2 for the September period. 					
Corrective Action (filled by organization audited):					

1. Revision of SOP for Maintenance of Facilities and Infrastructure No. SOP/HRD/12 dated December 24, 2017
2. Realization of Monitoring and Maintenance Progress of Plasma Division 2 Public Facilities and Infrastructure
3. Realization of improvement of toilet in Division 2 Plasma facilities and infrastructure

Assessor Evaluation and Conclusion (filled by auditor):
Verify November 3, 2020

The company shows evidence of improvement in the form of:

1. SOP Document for Maintenance of Public Facilities and Infrastructure No. SOP/GA/04 dated 30 October 2020 as a revision of SOP No SOP/HRD/12 dated 24 December 2017
2. Report on the results of public toilet repair activities on October 23, 2020
3. Results of monitoring damage to plasma buildings, staff mess and supporting buildings of PT BIA

Based on the foregoing, the non-conformance 2020.02 is declared unfulfilled.

Verify December 5, 2020

The company shows additional information in the form of:

1. Job description document No. JD/KBN/20 dated October 30, 2020 which explains the job description and authority of the building foreman, for example, receiving reports of building damage from the relevant departments and carrying out building maintenance.
2. Documents of picket schedules and reports on the results of environmental cleaning and housing sanitation in each estate and plasma carried out by workers and residents of the house.
3. Building and bathroom monitoring form for each estate and plasma for the period November 2020
4. Example of a statement letter occupying an employee's mess which states that the employee will carry out all the rules and regulations for occupying a mess regulated by the company, including the obligation to maintain cleanliness, order and security together in order to create a clean and conducive environment.

The company has shown evidence of improvements and additional information needed. Thus, the non-conformance 2020.02 is declared fulfilled and will be observed for further assessment.

Verified by : **Satria Adi Putra**

NCR No.	: 2020.03	Issued by	: Satria Adi Putra
Date Issued	: 21 October 2020	Time Limit	: Surveillance 1
NC Grade	: Non Critical	Date of Closing	: 5 September 2022
Standard Ref. & Requirement	: 6.2.7 Permanent fulltime employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.		
Evidence observed (filled by auditor):			
1. Law No.13 / 2003, Article 66 paragraph 1 states that workers / laborers from companies providing worker / labor services may not be used to carry out main activities or activities that are directly related to the production process, except for supporting service activities or activities that are not directly related to the production process.			
2. Decree of the Central Executive of the Indonesian Palm Oil Association (GAPKI) No. SK / 073 / PPG / II / 2013 concerning the Flow of Work Implementation Process Activities in the Oil Palm Plantation Business Sector stated that the main activity of the plantation business sector is Harvesting and Processing of Fruit into CPO.			
3. Based on the results of interviews with workers at Estate C, it is known that there are third party harvester, sprayer, and fertilizer workers.			
4. Based on the results of document review:			

- a. The company employee list document, it is known that there are 58 contract employees for the operational activities of the POM 2, 385 contract employees for harvester at estate B, and 191 contract employees for harvester at estate C
- b. Employee recruitment documents for estate and mill, as an example:
 - A copy of the worker ID card with the initials B and the SPK document No BPNHL-SPK / KTK II-201007J states that the worker is a contract employee as a harvester of Div I Estate B from October 7 2020 to October 7 2021.
 - A copy of the worker ID card with the initials YMK and the SPK document No. BPNHL-SPK / KTK-190106-N7 stated that the worker is a contract employee as a harvester of Div IV Estate C from January 6, 2020 to January 6, 2021.
 - A copy of the worker ID card containing the ED and SPK document No BPHNL-SPK / KTK II-200703 H states that the worker is contract employee of mill POM 2 from July 3 2020 to July 3 2021.
- c. Contractor employee list document, it is known that there are harvesting and maintenance employees.
 - Proof of contractor employee recruitment suc as copy of ID card and SPK No. 001/SPK-01/Maret/ 2020 between the worker and the contractor stating that the worker is a contract employee from March 3, 2020 to March 2, 2021. The contractor reports the worker to PT BIA through a report entry force for Estate C on March 3, 2020.

Non-Conformance Description (filled by auditor):

The company has not been able to ensure that the core work is carried out by employees who have permanent and full-time work positions in accordance with applicable regulations.

Root Cause Analysis (filled by organization audited):

The appointment of PKWT workers to PKWTT is carried out periodically, when the audit was carried out the workers are still in the probation stage. Besides, there were several contract workers who have invalid ID cards making it difficult for the administrative process.

Correction (filled by organization audited):

1. Prepare a plan for the appointment of Harvesting and POM employees who are still contract employees
2. Checking and validating employee ID cards
3. Realizing the appointment of harvest workers and POM who are still contract employees to become permanent employees

Corrective Action (filled by organization audited):

1. Work Plan for Appointment of Harvest Workers and POM Workers
2. Recording of employee ID cards by population and civil registration agency.
3. Employee Assessment
4. Work agreement of harvesting and POM workers with permanent employee status

Assessor Evaluation and Conclusion (filled by auditor):
Auditor Verification in ASA-1 on 5 September 2022

1. The company showed the realization recap of harvesting worker promotion from contract worker to permanent worker in 2021, as follows:
 - a) Estate B PKWT workers with the latest data of 555 PKWT, the realization of the appointment of PKWT to PKWTT (including harvesting PKWT) in 2021 was 515 PKWT workers. So the total PKWT in 2021 left, was 40 PKWT.
 - b) Estate C PKWT workers with the latest data of 398 PKWT, the realization of the appointment of PKWT to PKWTT (including harvesting PKWT) in 2021 was 385 PKWT. So the total PKWT in 2021 left, was 15 PKWT.
 - c) POM 2 PKWT workers with the latest data of 53 PKWT, the realization of the appointment of PKWT to PKWTT (including PKWT in POM processing) in December 2021 was 53 PKWT. So there was no PKWT left in POM 2.
2. The company showed the realization of appointments in 2022, as follows:
 - a) Estate C PKWT workers with the latest data was 15 PKWT, realization of PKWT appointment of PKWT to PKWTT in January 2022 was 11 PKWT, and in February was 4 PKWT. So there was no PKWT left in Estate C.
 - b) Estate B PKWT workers with the latest data was 40 PKWT, realization of PKWT appointment of PKWT to PKWTT until September 2022 as 29 workers. So up until now, there were still 11 PKWT in harvesting work.
3. Based on the document review of UoC's list of workers for the period of August 2022, it's known that in Estate B there were still 11 contract worker left, in harvesting activity. Based on the interview with management representatives and the document

review, it's known that the 11 workers have not been appointed because they have not met the minimum criteria as a harvesting workers during workers appraisal. So they recommended to be appointed after the contract work agreement is over.

4. UoC then showed the plan to appoint 11 contract workers (PKWT) in harvesting, for example the workers on behalf of AL, FJ, IE, HN, CK (with initials) which is planned to be appointed in October 2022 after their PKWT work agreement period is over. UoC also showed their commitment stated in the CLA period of 2021 to 2023 that permanent works or core works are only for permanent workers (PKWTT).

Based on the description above, the non-conformity has complied and the company's plan will be observe in the next assessment.

Verified by : **Hasiholan Sihombing / Mia Rahmah Qadryani**

NCR No.	: 2020.04	Issued by	: Satria Adi Putra
Date Issued	: 21 October 2020	Time Limit	: 20 October 2021
NC Grade	: Critical	Date of Closing	: 22 December 2020
Standard Ref. & Requirement	: 6.4.2 Documented evidence on the fulfillment of worker's minimum age requirements in accordance with applicable regulation and verification procedures for age requirements, are available.		
Evidence observed (filled by auditor):			
1. Directors Decree No. BIA/DIR/17/171221 PT Bio Inti Agrindo regarding child labor stated that PT BIA is committed to not employing children under 18 years old.			
2. Based on document review :			
• List of contractor employees at Estate C, out of 743 workers, it is known that there is 1 worker under 18 years old.			
• Documents of recruitment such as copy of ID card and a report for incoming and outgoing workers from the contractor to PT. BIA, it is known that worker was not yet 18 years old when accepted for work			
• The list of employees in plasma Division 2, out of 104 workers, it is known that there is 1 worker under 18 years old			
• Documents of recruitment such as copy of ID card, copy of workers' family card, and SPK between workers and plasma cooperatives, it is known that worker was not yet 18 years old when accepted for work			
Non-Conformance Description (filled by auditor):			
Thus the company has not been able to ensure the fulfillment of the minimum age requirements for workers in accordance with applicable regulations			
Root Cause Analysis (filled by organization audited):			
The performance appraisal of partner contractors and Plasma Cooperatives has been carried out in September 2020, but at the end of the assessment until the audit takes place, a reassessment has not been carried out because based on the IK of the Contractor's Assessment, the performance appraisal is carried out every 3 (three) months. In that time span, it turns out that there are contractors and also Plasma Cooperatives that employ workers under the age of 18 years			
1. Transferring workers on behalf of R (Plasma Division 2) with the consent of the workers' parents until they reach 18 years of age (31 December 2020).			
2. Give a warning to CV Karunia who employs workers on behalf of O.J.T (Estate C)			
3. Screening the age of contractor workers (contract)			
4. Make the Contractor Workforce Assessment IK separate from the Contractor Performance Assessment IK, where the contractor's workforce assessment (employment aspect) is carried out from once every 3 (three) months to once a month.			
5. Prepare IK contractor recruitment			
6. The HRD Dept. appointed a PIC in charge of verifying the minimum age according to applicable regulations to all contractor workers in each operational unit to disseminate employment policies and contractor employment assessments.			
7. Prepare Contractor Workforce Verification SOP			
8. Determine the person in charge of verifying the contractor's workforce (verifier) for each Estate			

9. Collecting administrative documents and verifying the age of workers on behalf of R (Plasma Division 2) and O.J.T (Estate C)

Corrective Action (filled by organization audited):

1. Employee transfer letter on behalf of Riando (Plasma Division 2)
2. Work approval letter from parents on behalf of Riando (Plasma Division 2)
3. Employee attendance on behalf of Riando (Plasma Division 2)
4. Warning letter to CV Kurnia
5. Performance Assessment of CV Kurnia for the October 2020 Period
6. Approval for hiring Oktoridus J. Tefi
7. October 2020 Volume Labor Data (Worker Age Screening)
8. IK Contractor Employment Assessment
9. IK Recruitment for Contractor Workers
10. Report on Socialization of IK Employment and the age limit of workers
11. SOP for Contracting Labor Verification (SOP/HRD/14)
12. Job Description HR Estate (Verificator)
13. Worker Age Calculation Form
14. Contractor Manpower Verification Document on behalf of R (Plasma Division 2) and O.J.T (Estate C) in accordance with SOP/HRD/14

Assessor Evaluation and Conclusion (filled by auditor):

Verify November 13, 2020

The company sends the following documents:

1. Work Instruction No. IK/HRD/03 dated November 1, 2020 regarding the recruitment of contractor workers
2. Work Instruction No. IK/HRD/02 dated November 1, 2020 regarding contractor employment assessment
3. Data for PT BIA contract workers for the period November 2020
4. Work permit and work transfer for R employees (Plasma div. II)
5. Attendance for R . employees
6. CV performance appraisal letter for October 2020 period
7. Warning letter for CV
8. Work approval letter for O.J.T from CV
9. Joint socialization related to employment, OHS, Environment and Health which includes submissions regarding the prohibition of employing children under the age of 18 and sanctions for CV

Based on this, the non-conformance No 2020.03 is declared unfulfilled.

Verify December 1, 2020

The company provides answers to the auditor's responses. Based on the company's answer, it is known that human errors are often found when calculating the age of workers in the field because the completeness of the contractor's manpower file is still handled manually. However, the company has not shown evidence of how to avoid human error. Thus, the non-conformance No 2020.03 is declared unfulfilled.

Verify December 22, 2020
The company shows:

1. SOP document for contractor workforce verification No SOP/HRD/14 dated December 5, 2020. The SOP explains the stages of employee verification, namely:
 - Administrative verification: interviews and or inspection of the completeness of labor documents
 - Verification of completeness of labor data: manual and system verification
2. Example of an excel file form for the age verification of the contractor's workforce
3. Document job description verifier (recruitment staff) for each estate, where the main responsibilities include carrying out the selection and recruitment process as needed, updating wholesale data, and verifying data for submitting additions, reductions/replacements of contractor workforce.
4. Documents of completeness of labor administration on behalf of R and O.J.T

Based on the above, non-conformance No 2020.03 is declared fulfilled and will be re-observed the implementation and effectiveness of the system applied in the next year's assessment.

Verified by : **Satria Adi Putra**

NCR No.	2020.05	Issued by	Sansan Suhendar
Date Issued	October 21, 2020	Time Limit	December 05, 2022
NC Grade	Minor raised to Major	Date of Closing	
Standard Ref. & Requirement	6.7.2 Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.		

Evidence observed:

- Attachment II to the Minister of Manpower Regulation number 15 of 2008 concerning first aid for accidents in the workplace, states that the total contents of the first aid kit are 21 items.
- Based on the procedure number SOP/HSE/05 dated 24-12-2017 concerning first aid in accidents, point 2.3.6 states that the placement of the first aid kit must be in a condition that is easily accessible, clearly marked, in a visible and easy location. transferred if it is to be used, the type and number of boxes is adjusted to the number of workers based on the Attachment of the Minister of Manpower No. 15 of 2008.
- Based on field visits, it is known that:
 - In the POM 2 workshop and power house area, the first aid kit was incomplete with 21 items, eye sanitizer in the first aid kit that did not have an expiration date, and the employees interviewed did not understand the management of the first aid kit.
 - In the POM 2 Waste Pool (IPAL) area, the room where the waste drainage works is not available. First aid kits are not available.
 - In the field in Estate C division III to harvest work in blocks 32-41, spray at blocks 36-44 and division V scratching discs in blocks 31-29, supervisors or foremen do not bring first aid kits.

Non-Conformance Description:

The company has not been able to show that the availability of first aid equipment in the workplace has referred to the applicable procedures and regulations.

Root Cause Analysis:

- The order for the first aid kit and second semester first aid kit refills for POM 2 has been done since August 2020, but when the audit was carried out the first aid box refills were still in the process of loading and unloading at the port of PT. BIA so that a first aid kit was found with incomplete contents and there was no first aid kit in the waste disposal work area.
- First aid bags have been distributed to divisions that need them, but the company does not yet have a monitoring system to ensure the foreman brings first aid bags to the field.
- The expiry date of the eye cleanser in question is on the box/packaging of the eye cleanser, when the audit was carried out the OHS officer did not check the packaging properly, this was because there was no first aid training for OHS officers at POM II.
- OHS officers have not carried out socialization regarding the first aid kit to POM 2 employees, this is because training and socialization regarding first aid are still focused on first aid workers in the hope that the first aid workers will carry out socialization on the basics of first aid to employees.

Correction:

1. The company ensures that the first aid kits, first aid kit refills and first aid bags that have been ordered arrive and are distributed to work units in need.
2. The company develops a first aid bag monitoring system and carries out monitoring
3. The company socializes the first aid kit to employees
4. Prepare the second P3K training plan at POM II in 2021

Corrective Action:

1. IK (Work Instruction) Monitoring of first aid kits and bags
2. Letter of Request for Goods (Request Note) and Letter of Purchase of First Aid Boxes, first aid kit refills and first aid kits
3. First aid box inspection and monitoring report
4. Inspection report and first aid bag monitoring
5. Socialization report on the management of the first aid kit
6. First aid training plan for 2021

Assessor Evaluation and Conclusion:
Verification, January 18, 2021

The company has not shown evidence of improvements submitted to the results of corrections and corrective actions such as:

- Monitoring system to ensure that first aid workers carry first aid kits with spaciousness.
- Letter of Request for Goods (Request Note) and Letter of Purchase of First Aid Boxes, first aid kit refills and first aid bags
- Proof of delivery/handover of the first aid kit to complete the first aid kit that is not yet available at the mentioned work location.
- Implementation of first aid kit monitoring that has been going on until December 2020
- Evidence of socialization to employees related to the first aid kit
- IK Monitoring of first aid kits and bags
- First aid kit inspection and monitoring report
- First aid bag inspection and monitoring report

Based on the explanation above, the non-conformance is declared not fulfilled.

Auditee Response:

- A monitoring system to ensure officers carry a first aid bag to the field is found in the Path Weed Control IK, OPT Control IK, Plant Fertilization IK and Harvest Organization IK (attached)
- Letter of Request for Goods (Request Note) and Letter of Purchase of First Aid Boxes, first aid kit refills and first aid kit are attached.
- Proof of delivery/handover of the first aid kit at POM II
- Evidence of socialization to employees related to the first aid kit
- IK Monitoring of first aid kits and bags
- First aid kit inspection and monitoring report until December 2020
- First aid bag inspection and monitoring report until December 2020
- First aid training plan for 2021

ASA-1 auditor verification, September 5, 2022
Evidence observed:

- The company has procedures regarding first aid with document No. SOP/HSE/05 revision 1, effective August 20, 2022 explains that:
 - Point 2.3.6 states that the contents of the first aid kit are in accordance with Permenaker 15 of 2008.
 - Point 2.3.7 states that the placement of first aid kits must be in a condition that is easily accessible, clearly marked, in a visible location and easily moved when used, the type and number of boxes adjusted to the number of workers based on the Attachment of the Minister of Manpower No. 15 of 2008

- Based on the results of field observations in the harvesting activities of Block 39-81 Division 9 Estate B, it was found that the first aid bag brought by the foreman only contained 13 items, which did not comply with the procedures (21 items).
- Based on the results of field observations in the fertilization activity of Block 41-50 Division 3 Plasma, it was found that the first aid bag brought by the foreman only contained 13 items, which did not comply with the procedures (21 items).
- Based on the results of field observations at the Division 4 Plasma generator house, there are Rivanol and Sodium Chloride that have expired.
- Based on the results of field observations at PKS 2 IPAL, there is Betadine (povidone iodine) which has expired.
- Correction and Corrective action in the previous NCR assessment (Initial Certification) it was found that the Company developed a first aid bag monitoring system and carried out monitoring of the first aid kits and bags. However, in the ASA-1 assessment, the contents of the box and first aid bag were expired and the contents were not in accordance with the procedures they had.

Non-Conformance Description:

The company has not been able to show evidence that the contents of the first aid bag/box at the workplace are in accordance with applicable procedures and regulations. Due to the discrepancy in this indicator has not been met since the previous IC audit, the discrepancy in the indicator with **this minor category rises to the Major category.**

Verified by : **Sentot Adi Subandono**

NCR No.	: 2020.06	Issued by	: Satria Adi Putra
Date Issued	: 21 October 2020	Time Limit	: Surveillance 1
NC Grade	: Minor	Date of Closing	: ASA-1 (5 September 2022)
Standard Ref. & Requirement	6.7.4 All workers are provided medical care and covered by accident insurance. Cost incurred from work related incidents, leading to injury or illness, are covered in accordance with applicable regulations or by the unit of certification if applicable regulations do not provide protection.		
Evidence observed (filled by auditor):			

Based on the results of document review and interviews, it is known that:

- Interview with:
 - Harvester and sprayer (CV Rizky Karya) at Estate C known that workers do not have BPJS for Health and Employment yet
 - Company management explain that the provision of BPJS services is constrained by administrative completeness such as an invalid ID card, no family card, still a beneficiary.
- Based on document review:
 - List of employees of CV Rhizky Karya (Estate C), it is known that they have 85 employees. However, the number of employees who have BPJS Employment are 13 people, and none of them have been registered with BPJS Health
 - List of employees of CV Sila (Estate C), it is known that they have 15 employees. However, the number of employees who have BPJS Health and employment are 8 people.
 - List of employees of CV Oan Malaka (Estate B), it is known that they have 44 employees. However, the number of employees who have BPJS Employment are 14 people, and none of them have been registered with BPJS Health.
 - Contract work agreement No 0009 / SPK / BIA / KSUPPSMS / III / 2020B between the company and **CV Rizki Pratama Jaya** dated 1 April 2020 - 1 April 2021 for cargo transportation. In article 10, the second party is obliged to involve workers in the insurance program, both BPJS Employment, BPJS Health and other insurance at their own expense and show written evidence in the form of a membership certificate to the first party. However, the company has not shown proof of payment for the 2020 BPJS Employment and Health in accordance with the agreement above.

- Based on data from contractor employees of **CV Rizki Pratama Jaya** for the period 2020, there are 12 employees who work at CV Rizki Pratama Jaya for work at Plasma Division 2.
 - List of employees (wholesale) at Plasma Division 2, it is known that they have 104 employees. The number of employees who have BPJS Health are 81 people and BPJS employment are 29 people.
3. Article 99 of Law No. 13 of 2003 on Manpower states that every worker / laborer and his family has the right to obtain labor social insurance

Non-Conformance Description (filled by auditor):

The company has not been able to show evidence that all workers has been given health and accident insurance by occupational accident insurance.

Root Cause Analysis (filled by organization audited):

From the results of the identification of the completeness of the employee ID (KTP), it was found that several employee NIKs were invalid and could not be registered with BPJS Health and BPJS Employment.

Correction (filled by organization audited):

1. The company conducts employee identity screening (KTP)
2. Coordinate with the Office of Demographic Affairs of Merauke Regency to carry out data collection and recording of employees who do not have an invalid ID card (constrained by covid-19)
3. Register for BPJS Health and Employment for Workers who have a valid ID Card but do not yet have BPJS Health and Employment
4. Paying for BPJS Health and Employment of Workers

Corrective Action (filled by organization audited):

1. Work plan for BPJS Health and BPJS Employment
2. Worker ID card screening report
3. BPJS membership data for contractor workers
4. Coordination report on ID card management with Office of Demographic Affairs of Merauke Regency
5. Proof of BPJS Employment membership registration for new contractor workers
6. Proof of registration of BPJS Health membership for new contractor workers
7. Payment Proof of BPJS Employment for new contractor workers
8. Payment Proof of BPJS Health for new contractor workers

Assessor Evaluation and Conclusion (filled by auditor):
Auditor verification on 5 September 2022

The company showed the evidence related to the non-conformity, as follows:

1. The record of identity card issued collaborated with the Population and Civil Registration Agency of Merauke on 14 June 2021 in Estate B and 12 to 13 June in Estate C. The report informed that there were 112 workers in Estate B and Estate C got their new ID card.
2. List of workers period of July 2022, which informed the total workers in PT Bio Inti Agrindo which was 3,380 workers. The company then showed the detail payment of social security insurance (BPJS *Ketenagakerjaan*) and health insurance (BPJS *Kesehatan*) on the same period, as follows:
 - a) Payment proof of BPJS *Kesehatan* for the period of July 2022 on 8 July 2022 for 3,412 workers.
 - b) Payment proof of BPJS *Ketenagakerjaan* for the period of July 2022 on 8 July 2022 for 3,434 workers.
3. List of contractor workers in July 2022, which informed the number of contractor workers in CV. Ilham Mandiri in Estate B has 12 contractor workers. The company then showed the proof of payment of BPJS *Ketenagakerjaan* in July 2022 for 10 workers and BPJS *Kesehatan* for the July 2022 period which was 6 workers.
4. Based on the interview and document review, it is known that the difference in the number of contractor workers of CV Ilham Mandiri with the number of BPJS *Ketenagakerjaan* participants (in the same period) due to 2 (two) workers had an invalid ID card number. Meanwhile, the difference between the number of contractor workers and the number of BPJS

Kesehatan participants (in the same period) was because the workers have been registered in government membership (PBI)

5. List of contractor workers in Estate B for the period of July 2022, which informed the number of contractor workers CV. Ananda Putra Cahaya was 5 workers. The company then showed proof of payment of BPJS *Ketenagakerjaan* in July 2022 was 2 workers and BPJS *Kesehatan* was 1 worker.
6. Based on the interview and document review, it is known that the difference in the number of contractor workers CV. Ananda Putra Cahaya and the number of BPJS *Kesehatan* participants (in the same period) because 3 (three) workers had problems with their ID card number. Meanwhile, the difference between the number of contractor workers and the number of BPJS *Kesehatan* participants (in the same period) was because the workers have been registered in PBI membership.
7. Based on the document review of letter decree for all contractors in March 2022, it is known that there was a warning letter from the company to all contractors regarding contractor workers who do not have their ID cards or who had invalid ID card number to immediately managing their residence documents so that later the contractor workers can be registered by BPJS *Kesehatan* and BPJS *Ketenagakerjaan*.

Based on the description above, the non-conformity has complied and the company's plan will be observe in the next assessment.

Verified by : **Hasiholan Sihombing / Mia Rahmah Qadryani**

NCR No.	: 2020.07	Issued by	: Sansan Suhendar
Date Issued	: 21 October 2020	Time Limit	: Surveillance 1
NC Grade	: Non Critical	Date of Closing	: 06 September 2022
Standard Ref. & Requirement	: 7.3.1 A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations.		
Evidence observed (filled by auditor):			
<div>1. Based on PermenLHK number P.56 of 2015 article 7 number 2 point b.1 and PP number 101 of 2014 article 28 number 1 point b.2 hazardous waste produced is less than 50 kg (fifty kilograms) per day for hazardous Waste Category 1 is stored in a hazardous waste storage area for a maximum of 180 (one hundred and eighty) days and based on company procedure number SOP/HSE/20 dated 24-12-2017 regarding the handling and management of hazardous waste point 2.6 states that the storage of the generated hazardous waste may not be stored for more than 90 days. If the waste generated is less than 50kg/day, the Licensing Staff will apply for an extension of the waste storage permit for more than 90 days (up to 180 days) to the Ministry of Environment.</div> <div>2. Based on the results of document review, it is known that:<div><div>The results of hazardous waste identification that have been carried out by the company have not identified all B3 waste produced such as plastic inner fertilizers, used grout packaging and used PPE spray (ex-mask cartridges, rubber gloves, apron and boots)</div><div>The results of the verification of the hazardous waste delivery minutes and the hazardous waste producer manifest, the company has sent medical waste on January 11, 2020, but until the audit is carried out (13 October 2020) the company has not sent back the medical waste produced (more than 8 months).</div></div></div>			
Non-Conformance Description (filled by auditor):			
The company has not been able to show that the implementation of waste management is in accordance with the applicable laws and regulations.			
Root Cause Analysis (filled by organization audited):			

- The results of the identification of waste that are shown to be carried out by individuals are not carried out cumulatively by the responsible environmental team.
- At the time of the audit, the medical waste produced could not be sent because it was waiting for information on cooperation in the destruction of medical hazardous waste (use of incinerator) with Merauke Hospital. PT Bio Inti Agrindo already has a partnership with PT. Primanru Jaya, but PT Primanru does not yet have a partnership with the medical waste manager. The cooperation will only be carried out in 2021.

Correction (filled by organization audited):

1. Conduct thorough Waste identification throughout the Department
2. Ensuring that the Management in collaboration with PT Bio Inti Agrindo has a permit or cooperation with the medical waste management party
3. Sending medical waste to the management

Corrective Action (filled by organization audited):

1. Provide training on hazardous waste management to the person in charge of hazardous waste
2. Delivery of hazardous waste according to schedule.

Assessor Evaluation and Conclusion (filled by auditor):
ASA-1 verification on September 6, 2022

The company has shown several repair documents, namely:

- Report on the results of online training on hazardous waste management conducted by the Environmental Pollution Control Professional Certification Agency (LSP Daimaru) which was held on 22-23 December 2020 which was attended by the B3 Responsible Person PT. BIA, namely Ms. Marlen Aviati Sarah Pepiana, with the decision of the competency test results from the training it was stated that Ms. Marlen Aviati Sarah was competent.
- Document of the Decree of the Head of LSP Daimaru with the number KEP-SER-2012-005 dated December 30, 2020 which is accompanied by a list of competency test results in charge of B3 Waste Management on behalf of Marlen Aviati Sarah Pepiana from PT. Bio Inti Agrindo with the position of Asesi / person in charge of hazardous waste management is declared competent.
- Documents resulting from the re-identification of all B3 waste produced by all work units carried out by the person in charge of Hazardous Waste Management on January 4, 2021. From the identification results, there are 35 types of hazardous waste that must be collected in a temporary storage area. The identification results are validated by the Sustainability Manager and recognized by the General Manager.
- Hazardous Waste Manifests include: used air filters, used oil filters, used syringes (medical waste), used pesticide packaging, TL lamps, used cartridges, used oil and used batteries with producer PT Bio Inti Agrindo with a delivery date of 24 December 2020.
- The company can show a manifest for the transportation of medical waste that is carried out every month, for example for the period March 2022, transportation will be carried out on March 22, 2022 with Manifest KLHK-16614093337 and for the period April 2022, transportation will be carried out on April 9, 2022 with Manifest KLHK-1661414415.

Based on the evidence shown by the company, the non-conformity in this indicator is declared Fulfilled.

Verified by : **Rahmat Abdiansyah**

NCR No.	: 2020.08	Issued by	: Sansan Suhendar
Date Issued	: 21 October 2020	Time Limit	: 20 October 2021
NC Grade	: Critical	Date of Closing	: 11 August 2021
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 Procedures (RaCP) applies.
Evidence observed (filled by auditor): PT. BIA conducted an HCV assessment in 2017 but the results of the study were not approved by the RSPO, then PT. BIA conducted a review of HCV in 2020 and was approved by the RSPO in July 2020. Based on this, the Company carried out a Land Use Change Analysis and was approved by the RSPO on 13 August 2020. The Company has then presented the Remediation and Compensation Plan document (RaCP) which has just received an RSPO review on October 6, 2020 and the Company has sent a revision of the results of the review on October 18, 2020. Until the end of the audit there has been no response from the RSPO regarding the approval of the results of the revised RaCP sent by the Company.	
Non-Conformance Description (filled by auditor): The company does not have enough evidence to ensure that the RaCP that has been made has been approved by the RSPO.	
Root Cause Analysis (filled by organization audited): There is no evidence that the RaCP was approved by the RSPO secretariat at the time of the initial audit.	
Correction (filled by organization audited): The company has obtained an approval report from the RSPO Secretariat regarding the RACP that has been fulfilled.	
Corrective Action (filled by organization audited): Report to the Certification Body on the fulfilled RaCP report from the RSPO Secretariat	
Assessor Evaluation and Conclusion (filled by auditor): Verification on August 11, 2021. Email Approval from RSPO (Alicia Khor) on 21 July 2021 stated that officially inform that with the satisfactory evaluation results of the compensation plan, the RaCP process for PT BIA is now completed. Based on the data above, it can be concluded that the non conformity No. 2020.06 is declared to have been fulfilled.	
Verified by	: Satria Adi Putra

3.4.2. Identification of Findings, Corrective Actions and Observations at ASA-1 Audit

NCR No.	:	2022.01	Issued by	:	Rahmat Abdiansyah
Date Issued	:	06 September 2022	Time Limit	:	05 December 2022
NC Grade	:	MAJOR	Date of Closing	:	
Standard Ref. & Requirement	:	3.4.3 The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.			
Evidence observed (filled by auditor):					
<ul style="list-style-type: none">• The company already has a Social Impact Assessment Report (SIA) of PT. Bio Inti Agrindo conducted in January 2017 to February 2017 conducted by Aksenta. From this study, there are recommendations for social management and monitoring for 2017-2019 that will be carried out by the company.• In 2020, the company re-assessed the social impact and reviewed the implementation of social management and monitoring for the period 2017-2019 which was carried out by Ekologika Consultant. From the results of these studies and reviews, there are recommendations for managing social impacts for 2020-2022. The recommendations for managing social impacts are as follows<ol style="list-style-type: none">1. Strengthening communication and social relations with the clans of customary land owners and the community around the company with the aim of good communication between the company and the clans of customary owners and the village community.2. Company participation in improving human resources within the Company in cooperation with third parties through scholarship policies.3. Recruitment and management of local workforce.4. Development of CSR programs to help increase the economic independence of the community. The activities are expected to be carried out by conducting a livelihood assessment that focuses on commodity development by the community, including vulnerable communities, women and youth.5. Development of CSR programs to participate in improving the basic facilities of clans who own customary land, which provides convenience for companies and the community. The activities are expected to identify needs based on community proposals.6. Development of community plantations.• The company has carried out social impact management and social impact management reviews for the 2020-2022 period which is listed in the PT BIA Social Impact Management Monitoring Report for 2020-2022, but the implementation date is unknown and evidence of the implementation of the review was carried out in a participatory manner.• Based on the results of interviews with external stakeholders such as representatives of the Mandob Sejahtera Cooperative, Ilsay Mandiri Cooperative, Kindiki Village, Selil Village, Mahuze Kewam and Mahuze Milafo clans, it is known that there are several social issues that are developing, for example:<ol style="list-style-type: none">1. Communication with the company is deemed ineffective because every complaint submitted has not been responded to by the company.2. Scholarships provided by the company received complaints and questions regarding the nominal scholarship provided by the company.3. The company's CSR program has not been based on the results of consultations and needs have not been identified with the community. This is because some of the CSR assistance provided by the company is deemed less targeted by the community.					
Non-Conformance Description (filled by auditor):					
Based on this explanation, the company has not been able to show evidence that the review of social impact management has been carried out in a participatory manner					
Root Cause Analysis (filled by organization audited):					

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.	:	2022.02	Issued by	:	Sentot Adi Subandono
Date Issued	:	06 September 2022	Time Limit	:	05 December 2022
NC Grade	:	MAJOR	Date of Closing	:	
Standard Ref. & Requirement	:	3.6.1 All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.			
Evidence observed <i>(filled by auditor):</i> <ul style="list-style-type: none"> The CH has identified the hazards and risks listed in the 2022 PT BIA Plantation and Mill HIRADC document which has been effective since January 2022. The document describes the risks and hazards of each activity, for example: <ol style="list-style-type: none"> Heavy Equipment Operations with the risk of fractures. Control measures taken are not to ride or depend on heavy equipment. FFB transportation activities with the risk of fractures, abrasions, pinching, and death. Control measures taken are not to hold on to the tailgate and not to sit on the head of the truck. Based on the results of observations at Estate B, it is known that there are workers / helpers who ride / sit next to the Grader operator. Based on observations in the residential area of Estate C, it is known that there are workers riding excavators who are moving places by sitting in the bucket and next to the excavator boom / arm. Based on the results of observations at Estate B (when transporting FFB to the POM) it was found that the loaders were sitting on a moving FFB truck. The company also has the PT BIA Plantation HIRADC document in 2022 which has been in effect since January 2022 which explains that the Rinse House Activities include storage of work tools and PPE as well as personal cleaning (bathing). However, the results of interviews with fertilizer workers in Block 41-50 Division 3 Plasma, it was found that the apron and rubber gloves were washed and stored at home. As explained by PIC Plasma, this is because the condition of the rinse house is not adequate. 					
Non-Conformance Description <i>(filled by auditor):</i> Based on this evidence, there are company operational activities that have not been carried out in accordance with their HIRADC.					
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	:	
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NCR No.	:	2022.03	Issued by	:	Hasiholan Sihombing
Date Issued	:	05 September 2022	Time Limit	:	Next Surveillance
NC Grade	:	Minor	Date of Closing	:	
Standard Ref. & Requirement	:	4.2.3 The unit of certification keeps parties informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.			
Evidence observed (filled by auditor):					
<div>1. UoC showed the SOP in handling workers grievances No. SOP/SOS/08 validated on 24 March 2022 by the President Director. This policy explained that the complaints can be submitted to HRD then will be record in the complaint settlement report.</div> <div>2. Based on the field visit and the interview with the occupants in housing area, there were a grievances related to housing facilities which has been informed as a grievance to the UoC but there were no information updates related to the grievance which has been reported, for instance: The grievance related to roof leak in housing area of Division 3 and 7 in Estate B.</div> <div>3. Based on the grievance record from all suggestion box in PT Bio Inti Agrindo period of 2021 to 2022, there was no grievance reported through suggestion box. In addition, based on the logbook of PT BIA internal grievance, it's known that in 2022 there was only two grievances and not related to facilities as informed during field visit.</div>					
Non-Conformance Description (filled by auditor): UoC has not been able to show the evidence that every complaint has been documented in accordance with its procedures and informing the progress of the complaint handling to the parties.					
Root Cause Analysis (filled by organization audited):					
Correction (filled by organization audited):					
Corrective Action (filled by organization audited):					
Assessor Evaluation and Conclusion (filled by auditor):					
Verified by	:				

NCR No.	:	2022.04	Issued by	:	Rahmat Abdiansyah
Date Issued	:	06 September 2022	Time Limit	:	ASA-2
NC Grade	:	Minor	Date of Closing	:	
Standard Ref. & Requirement	:	4.3.1 Contributions to community development that are based on the results of consultation with local community are demonstrated.			

Evidence observed (filled by auditor):

- In the 2020 SIA study report conducted by Ekologika Consultant, there are recommendations for managing social impacts, one of which is the development of CSR programs to participate in improving the basic facilities of clans who own customary land, which provides convenience for companies and the community. The activities are expected to identify needs based on community proposals.
- The company already has a 2022 CSR program such as community assistance such as clan incentives, social assistance, and food aid (BAMA) which are routinely provided by the company. However, there is no evidence that the program was developed based on the results of consultations with the community.
- The results of the interview with the Company's PIC revealed that the company's CSR program was prepared by the company's management and was not based on the identification of community needs in the preparation of the CSR program.
- Based on the results of interviews with external stakeholders such as representatives of the Mandob Sejahtera Cooperative, IIsai Mandiri Cooperative, Kindiki Village, Selil Village, Mandekman Village, Mahuze Kewang and Mahuze Milafo clans, it is known that the CSR program owned by the company has not been based on the results of consultations and needs have not been identified with the community. This is because some of the CSR assistance provided by the company is deemed less targeted by the community.

Non-Conformance Description (filled by auditor):

Based on this explanation, the company has not been able to show evidence that the CSR program for community development has been carried out based on the results of consultations with local communities.

Root Cause Analysis (filled by organization audited):
Correction (filled by organization audited):
Corrective Action (filled by organization audited):
Assessor Evaluation and Conclusion (filled by auditor):
Verified by
:

NCR No.	:	2022.05	Issued by	:	Hasiholan Sihombing
Date Issued	:	06 September 2022	Time Limit	:	05 Desember 2022
NC Grade	:	MAJOR	Date of Closing	:	
Standard Ref. & Requirement	:	6.2.2 Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed			
Evidence observed (filled by auditor):					

1. Based on the field visit in Plasma Division 3 Estate, there was a person on behalf of WR (initial) who was helping his spouse in loose fruit picking activity. Based on the interview with the person who's helping her spouse, it's known that she was not registered as the UoC's worker and didn't have any work agreement with the company.
2. Based on the list of workers in PT BIA specifically in Plasma Division 3 Estate period of July 2022, there was no worker on behalf of WR (initial) registered as the worker in Plasma Division 3 Estate.
3. Based on the interview with the foreman, it's known that there were still harvesting workers helped by their family who wasn't registered as the worker (aside from the one who auditor found during field visit), but during field visit the others were sick.

Reference

- Law number 13 of 2003 concerning manpower in article number 50, stated that the employment relationship occurs because of the employment agreement between the company and the worker.
- Government Law number 35 of 2021 concerning PKWT, outsourcing, working and rest hour, and termination, stated that:
 - In article number 2 verse 1, stated that the employment relationship occurs because of the employment agreement between the company and the worker.
 - In article number 2 verse 4, stated that work agreement made for temporary period or permanent.

Non-Conformance Description (filled by auditor):

Based on the explanation above, it's known that there was still a personnel who worked in the company's operational area without having the work agreement signed before work. This was not in accordance with the existing regulation

Root Cause Analysis (filled by organization audited):
Correction (filled by organization audited):
Corrective Action (filled by organization audited):
Assessor Evaluation and Conclusion (filled by auditor):
Verified by
:

NCR No.	:	2022.06	Issued by	:	Hasiholan Sihombing
Date Issued	:	06 September 2022	Time Limit	:	ASA-2
NC Grade	:	Minor	Date of Closing	:	
Standard Ref. & Requirement	:	6.5.3 Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified in accordance with applicable regulations in Indonesia			
Evidence observed (filled by auditor):					
1. UoC showed the result of new mothers' need identification which was conducted in January 2022 based on the questionnaire given to 25 respondent of new mothers in Estate A, Estate B, Estate C, and Plasma. This document informed the needs of new mother, as follows: providing mother and child program (including pregnant women guidance, breastfeeding socialization, and medical check-up), providing breastfeeding comfortness to new mom by giving mattress and chair to breastfeed in daycare.					

<p>2. Based on the interview with the management representatives and the field visit in Estate B, it is known that there were no daycare in all Divisions in Estate B due to the conversion of the building from daycare to Covid-19 quarantine room.</p> <p>3. Based on the document review of UoC's list of workers in July 2022, it is known that there were 153 female workers in Estate B. Then based on data on new mothers for the period of 2021 to 2022 in Estate B, it is known that the number of new mothers in 2021 was 3 new moms, and in 2022 were 3 new moms.</p> <p>4. UoC then showed the collaboration agreement in construction daycare building in Estate B No. 2022/08/KK/BIA/24-06 between the company and CV Doa Ibu. In the agreement, it is informed that the work agreement was effective from 23 June 2022 to 23 August 2022 (it ended when the audit was carried out). However, there was no further information regarding the construction of the daycare in Estate B.</p>	
<p>Non-Conformance Description (filled by auditor):</p> <p>Based on the explanation above, it's known that the UoC has not been able to show the fulfillment of new mothers' need in accordance with the identification result, namely the provision of breastfeeding facility at the daycare.</p>	
<p>Root Cause Analysis (filled by organization audited):</p>	
<p>Correction (filled by organization audited):</p>	
<p>Corrective Action (filled by organization audited):</p>	
<p>Assessor Evaluation and Conclusion (filled by auditor):</p>	
<p>Verified by :</p>	

NCR No. :	2022.07	Issued by :	Sentot Adi Subandono
Date Issued :	06 September 2022	Time Limit :	05 December 2022
NC Grade :	MAJOR	Date of Closing :	
Standard Ref. & Requirement :	<p>6.7.3 Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p>		
<p>Evidence observed (filled by auditor):</p> <ul style="list-style-type: none"> The company already has PT BIA's HIRADC Plantation and Factory 2022 document which has been in effect since January 2022 which explains that the Rinse House Activities include storage of work tools and PPE as well as personal cleaning (bathing). The results of interviews with spray workers in Block 39-81 Division 9 Estate B, it is known that employees clean themselves (shower) after doing the spray work at home. The results of the interview with the Company's PIC revealed that workers are still cleaning themselves (bathing) at home because the condition of the rinse house is not proper. The results of interviews with spray workers in Block 38-57 Division 7 Estate C, it is known that employees clean themselves (shower) after doing the spray work at home. 			

<ul style="list-style-type: none"> Observations at the Rinse House Division 5 Estate C revealed that there was 1 bathroom for 14 spray and fertilizer workers with the condition of the bathroom door not locking, partially wired walls and not completely closed. Observations at the Rinse House Division 3 Plasma revealed that there is only 1 bathroom for 14 spray and fertilizer workers. The results of the interview with the Company's PIC revealed that workers still clean themselves (bath) at home because the condition of the rinse house is not adequate. 	
Non-Conformance Description (filled by auditor): Based on the observed evidence, the company has not been able to provide sanitation facilities for workers who use pesticides so that workers can remove PPE, clean themselves and put on their personal clothes.	
Root Cause Analysis (filled by organization audited):	
Correction (filled by organization audited):	
Corrective Action (filled by organization audited):	
Assessor Evaluation and Conclusion (filled by auditor):	
Verified by :	

NCR No.	: 2022.08	Issued by	: Rahmat Abdiansyah
Date Issued	: 06 September 2022	Time Limit	: ASA-2
NC Grade	: Minor	Date of Closing	:
Standard Ref. & Requirement	7.3.2 Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Evidence observed (filled by auditor): <ul style="list-style-type: none"> The company has identified the waste generated from the factory and plantation activities. For example, the identified wastes are as follows: Used fertilizer sacks (Plastic Fertilizer) are included in the category of used hazardous packaging. The former thinner packaging is included in the category of packaging contaminated with hazardous waste. Used pesticide packaging is categorized as Hazardous used packaging. Used paint packaging is included in the category of Hazardous contaminated packaging The used oil drum is included in the category of hazardous contaminated packaging Domestic household waste is included in the category of Non-hazardous waste. The SOP for handling and managing Hazardous Waste with Number SOP/HSE/20 dated December 24, 2017 explained that all hazardous waste should not be disposed of but should be handed over to companies that already have a permit. In addition, all waste generated by PT BIA's activities will be temporarily accommodated/collected in special places according to their respective types, including clinical waste. Non-hazardous waste will be sent to a collection facility for recycling and can be disposed of by dumping it in a designated final disposal site. For hazardous waste placed in the Temporary Storage of Hazardous Waste. 			

- The results of field observations at Landfills Block 27-72 Estate B revealed that there were used drums, used oil packaging, used Tinner packaging mixed with domestic waste in the Landfills.
- The results of field observations at the Employee Housing Division 3 Estate B revealed that there were 3 pieces of used paint packaging in the housing.
- The results of field observations at the WWTP Pump House POM 2 found that there were used drums and used oil packaging inside the WWTP pump house.
- The results of field observations at Landfills Block 36-51 Estate C revealed that there were plastic fertilizers, used pesticide packaging, and used paint packaging in the Landfills mixed with Domestic Waste.
- The results of field observations in Block 41-47 Plasma 2 Division 3 revealed that there are plastic fertilizers that are not placed in the Temporary Storage of Hazardous Waste.

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

Based on this explanation, the company has not been able to show evidence that the waste disposal is in accordance with the procedures it has.

Root Cause Analysis *(filled by organization audited):*
Correction *(filled by organization audited):*
Corrective Action *(filled by organization audited):*
Assessor Evaluation and Conclusion *(filled by auditor):*
Verified by :

NCR No.	: 2022.09	Issued by	: Rahmat Abdiansyah
Date Issued	: 06 September 2022	Time Limit	: ASA 2
NC Grade	: Minor	Date of Closing	:
Standard Ref. & Requirement	: 7.3.3	The unit of certification does not use open fire for waste disposal	
Evidence observed (filled by auditor):			
<ul style="list-style-type: none">• The SOP for Handling and Management of Hazardous and Toxic Waste Number SOP/HSE/20 dated December 24, 2017 explained that the destruction of Non-Hazardous and Toxic (Non-Hazardous) waste should not be burned because it will cause air pollution.• Based on the results of field observations at POM 2 Housing, it was found that there were 2 burn marks of domestic waste in the housing area.• Based on the results of field observations at the Plasma Division 4 Housing, there were traces of domestic waste burning in the housing area.			
Non-Conformance Description (filled by auditor):			

Based on this evidence, there is still domestic waste management by burning which is not in accordance with the procedures that have been owned by the company.

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

Correction *(filled by organization audited):*

Corrective Action *(filled by organization audited):*

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

Verified by

:

3.4.3. Opportunity for Improvement

No	Ref. Std.	Description
1	2.1.1	<p>The unit of certification complies to relevant regulations</p> <p>In the ASA 1 assessment carried out, the company expanded the waste water utilization area for both PKS 1 and PKS 2 by collaborating with consultants PT Mitra Hijau Indonesia in the preparation of technical studies and the management of Pertek and SLO. Currently, the Draft Technical Study for Fulfillment of Wastewater Quality Standards (Application to Soil) has been uploaded to the One Stop Service of the Ministry of Environment and Forestry online on August 13, 2022. However, the progress of the completion of permits related to the expansion of the waste water application area has not been completed.</p> <p>The company has the opportunity to ensure that the progress of the completion of permits for the expansion of wastewater applications is positive.</p> <p>The company has identified the need for OHS licenses for machine and heavy equipment operators both at PLS and at the estate. The company has a training program for the fulfillment of OHS licenses, and has been shown OHS licenses for several operators which will be implemented in semester 1 of 2022.</p> <p>Companies are encouraged to ensure that all machine and heavy equipment operators have obtained the appropriate OHS licenses.</p>
2	7.3.1	<p>Based on the results of interviews with representatives of the Mahuze Milafo clan, there is an issue of environmental pollution carried out by the company, namely the spilling of POME on the Land Application in Block 33-71 Estate B. This has been confirmed to the company and the company is aware of the issue. The company can show the Minutes of the overflow of the Land Application on March 3, 2022. This is due to the negligence of the officer in opening the LA pipe faucet (Ball Valve). The company has made repairs by closing the broken roak, blocking the flow of the ditch so that the waste water does not flow into the ditch, sucking the wastewater that enters the ditch, and making an emergency roak in the last LA pond.</p> <p>Based on the results of field visits to the IPAL POM 2 area, it is known that in conveying Liquid Waste (POME) from POM to Estate, the company uses pipes to drain the POME. The results of field observations in the LA Blocks 31-69, 30-74 and 33 70 Estate B showed that there is a pipeline that crosses the ditch before it flows into the rorak in the Estate. In addition, in the LA area, there is a rorak for POME application and 3 rorak is emptied in anticipation of overflow. During the field visit, there were no indications of spillage or environmental pollution by the company.</p> <p>The company also has a Waste pool maintenance work program and LA Block monitoring, namely by stockpiling embankments, assembling pumps for pool washing, maintenance/repair of pump machines, dredging mud in ponds, maintaining embankments in ponds, and monitoring Land Application Blocks.</p> <p>Companies are encouraged to ensure that the waste pond and LA Block maintenance work program is consistently implemented so that POME overflow incidents in the LA area do not occur again.</p>

3.4.4. Noteworthy Positive Components

No	Description
1	UoC's commitment in implementing the principles of sustainable palm oil management.
2	Good cooperation from the staffs and the personnel in charge during audit process.
3	The usage of drone technology in monitoring High Conservation Value areas.
4	Received an award from the National Family Planning Coordinating Agency (BKKBN) in 2021 regarding the Winners of Simultaneous Family Planning Services of a Million Acceptors.
5	Received an award from BPJS Health in 2021 related to Business Entities Aware and Complying with the Best Rules for the Category of Macro-Scale Business Entities
6	Received an award from custom and excise of Merauke District in 2021
7	Has obtained ISPO certificate

3.5 Summary of Arising Issues from Public and Auditor Verification

Public Issues (Institution/ NGO/Community)	Auditor Verification
Manpower Agency of Merauke District Interviewees: Head of Industrial Relation, Date: 30 August 2022 <ul style="list-style-type: none"> PT. BIA has been registered their CLA for the period of 2021 to 2023 and signed by the head of the Manpower Agency. There was a request for mediation at a tripartite meeting in August 2022 regarding the termination of employees who are indigenous Papuans due to violation. Manpower Agency's suggestion in this tripartite meeting is that companies can provide assistance before termination by giving empowerment to Papuan natives and can re-employ this worker. The minimum wage referred to the Papua Province Minimum Wage because the District did not set a minimum wage in 2022. The company has provided wages to workers as stipulated in the Province Minimum Wage. All workers have been registered in the Social security insurance and health insurance. 	<p>Regarding to that issue, the company showed the record of tripartite meeting and the calculation of termination payment in accordance with the existing law. Based on the recommendation of Manpower Agency from tripartite meetings on 18 July 2022, UoC stated that they committed to give Papuan natives empowerment but for this termination case, they will not directly re-employ the worker directly. UoC planned to employ the worker who got termination before through recruitment process from the beginning.</p>
Department of Food Crops, Horticulture, and Plantation of Merauke Regency Name: Head of Service Date: August 30, 2022 <ul style="list-style-type: none"> The CH has reported LKUP and Fire Management Report regularly The CH already has plasma. There are 7 clans around the company. The CH is quite communicative and responsive to the service. <p>There are no social issues that threaten the company's operations.</p>	<p>There is no negative issue from Department of Food Crops, Horticulture, and Plantation of Merauke Regency.</p>
Merauke Regency Land Office Name: Head of Service Date: August 30, 2022 <ul style="list-style-type: none"> There are no new location permits and the addition of new HGUs. There is no overlap with forest area The company is quite communicative and responsive to the Land Office. <p>There have been no land disputes in the last 1 year.</p>	<p>There is no negative issue from Merauke Regency Land Office.</p>
Merauke Regency Environmental Service Head of Development and Supervision Section Date: August 30, 2022 <ul style="list-style-type: none"> The company already has environmental documents that are 	<p>There is no negative issue from Merauke Regency Environmental Service.</p>



Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>in accordance with the provisions.</p> <ul style="list-style-type: none"> • Reports on the implementation of environmental management and monitoring plans have been routinely reported by the company. The report is reported every semester. • The contents of the environmental management and monitoring report carried out by the company are in accordance with KepmenLH No. 45. • The company already has a permit for temporary storage of hazardous and toxic waste that has complied with the provisions and the permit is still valid. • Reports on the management of hazardous waste have been reported on a quarterly basis by the company. Land disputes over the past 1 year. • Currently the company is in the process of obtaining an LA permit related to the expansion of the liquid waste application area. It's just that the process is currently in the Ministry of Environment and Forestry. • The company has reported routine liquid waste monitoring reports. • So far, no environmental pollution issues have been carried out by the company. • So far, there has been no issue of land fires in the company's area. 	
<p>Previous Land Owner / Customary Rights Owner Date of Interview: 30 August 2022 Interviewee:</p> <ul style="list-style-type: none"> - 4 person from Mahuze Milafo Clans - 2 person from Mahuze Kewam Clans - 1 person from Mahuze Besar Clans - 1 person from Kaku Clans - 1 person from Gebse Clans <ul style="list-style-type: none"> • There are no problems and conflicts over land ownership between the company and the surrounding community. • The company has socialized about protected animals and conservation areas and put up signs prohibiting hunting of certain animals around the plantation area. • Regarding CSR, the Village Community feels that it has not been targeted because the CSR program owned by the company is not based on the needs of the community. • There is liquid waste that overflows in the company's area, namely in Estate B, but the problem has been resolved. • The relationship between the community and clan with the company is going well, however, regarding complaints, the Company has not received a response. 	<p>Regarding the issue of environmental pollution carried out by the company, namely the issue of overflowing POME on Land Applications in Block 33-71 Estate B. The issue was obtained from the results of interviews with representatives of the Mahuse Milafo clan. This has been confirmed to the company and the company is aware of the issue. The company can show the Minutes of the overflow of the Land Application on March 3, 2022. This is due to the negligence of the officer in opening the LA pipe faucet (Ball Valve). The company has made repairs by closing the broken roak, blocking the flow of the ditch so that the wastewater does not flow into the ditch, sucking up the wastewater that enters the ditch, and making an emergency roak at the last cola in LA. The company can also show documentation of an agreement to resolve the LA Ball Valve leak in Estate B with indigenous peoples and clans who own customary lands on March 5, 2022. The settlement points are as follows:</p> <ul style="list-style-type: none"> • Socialization was carried out to the Mahuse Milafo and Kewam clans regarding the CPO production process starting from FFB entering to factory waste water entering the WWTP pond to LA. • Conducted outreach to the community regarding the process of testing factory wastewater.

Public Issues (Institution/ NGO/Community)	Auditor Verification
	<ul style="list-style-type: none"> • Elimination of points must get recommendations from several clans for people who will work in Estate B. • A fine of one hundred million rupiah. <p>All of these points have been implemented by the company, for example the company can show the minutes of socialization to the Mahuse Milafu and Kewam clans regarding the results of the wastewater test and the CPO production process, as well as the handover of the customary fine of one hundred million rupiah which was carried out on 19 May 2022 to the Deputy Head of the clan Mahuse Milafo.</p>
Village Representatives Interviewee: <ul style="list-style-type: none"> - Village Official of Mandekman Village - Head Village of Selil Village - Public Figure of Kindiki Village <ul style="list-style-type: none"> • The company absorbs workers from the village. • There are no land conflicts between the company and the surrounding community. • The company has socialized about protected animals and conservation areas and put up a sign prohibiting hunting of certain animals around the plantation area. • Socialization of the prohibition on burning for land clearing has been conducted. • Regarding CSR, the Village Community feels that it has not been targeted because the CSR program owned by the company is not based on the needs of the community. 	<p>Regarding CSR issue, it has been non conformity in indicator 4.3.1</p>
Mandob Sejahtera Village Unit Cooperative Interviewee: Cooperative management and member of cooperative <ul style="list-style-type: none"> • The company has conducted socialization related to the RSPO and also conducted trainings. • The management of plasma plantations will be carried out by the company (plasma full managed by the company). • The price of FFB refer to the price set by the Government. 	<p>There are no negative issues from Plasma Mandob Sejahtera Cooperative. The explanation regarding the interview results has been explained in the report</p>
Cooperative of Usaha Nusantara Bersatu Merauke Interviewees: Head of employee cooperative, Date: 30 August 2022 <ul style="list-style-type: none"> • Cooperatives engaged in providing food and daily needs. • The company strongly supports cooperative activities, by providing the cooperative buildings and electricity. • End year meeting period of 2021 occurred in November 2021. 	<p>There were no negative issues related to cooperative employee that need any further verification. The explanation regarding the interview output had been explained specifically in summary report.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
Labor Union of PT Bio Inti Agrindo (SPSI) Interviewees: Head of labor union and the labor union coordinator in Estate B and C. Date: 30 August 2022 <ul style="list-style-type: none"> The company acknowledges the existence of a labor union and there was no intervention in the implementation of any operational activities. Member of the labor union is 3,398 workers. All workers are the member of labor union but the head of labor union guaranteed that there was no force in the membership of labor union. Job vacancies were announced by UoC wall-boards and social media. Internal meetings of labor union were held every month. 	There were no negative issues related to labor union that need any further verification. The explanation regarding the interview output had been explained specifically in summary report.
Gender Committee Interviewees: Head of gender committee and the vice of gender committee Date: 30 August 2022 <ul style="list-style-type: none"> There was two complaints regarding issues related to sexual harassment and violence against women which has been solved by the gender committee. The gender committee had socialized some policies related to gender, sexual harassment, and domestic violence. Female workers who placed as pesticide application workers if they reported pregnant will be transferred to the non-agrochemical works, such as manual upkeep. 	There were no negative issues related to gender committee that need any further verification. The explanation regarding the interview output had been explained specifically in summary report.
CV MDC Bintang Bone - Contractor for Estate A, Estate B, POM 1, and POM 2 Resource Person: Director Date: 03 September 2022 <ul style="list-style-type: none"> Cooperating with companies as carriers of CPO PKS 1 and 2, as well as building employee housing in Estate A and Estate B. The contractor has paid wages in accordance with the applicable UMK. PPE for contractor workers is provided by the company. Not all contractor workers are registered with BPJS Health and employment. There are no complaints regarding payments. 	This has been verified in the report.
PT Internusa Jaya Sejahtera – Supplier TBS Resource Person: Manager Date: September 05, 2022 <ul style="list-style-type: none"> Sending FFB to POM 1 and 2, but mostly to POM 2. Work agreements and payments are made by the leadership on a Business-to-Business basis. 	There is no negative issue from PT Internusa Jaya Sejahtera

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> Non-standard FFB is sometimes returned, sometimes fined, but it is transparent enough. No complaints while working with the company. If Cooperation continues, ready to be checked by 3rd party Audit. 	
<p>CV Ilham Mandiri - Contractor of Estate B Resource Person: Director Date: August 30, 2022</p> <ul style="list-style-type: none"> Cooperating with companies as FFB carriers from Estate B to POM 2. There is an annual company evaluation. The contract is valid for 1 year. The contractor has paid wages in accordance with the applicable UMK (District Minimum Wage). PPE for contractor workers is provided by the company. Not all contractor workers are registered with BPJS Health and employment. There is no discrimination for contractor workers. There are no complaints regarding payments. Socialization related to safety driving, OHS aspects, and hazardous waste temporary storage such as waste oil and used filters has been given to be deposited in the company's hazardous waste temporary storage. 	<p>This has been verified in the report.</p>
<p>CV Mitchel Mandiri and CV Arif Rizki Jaya - C Estate Contractor Resource Person: Director Date: August 30, 2022</p> <ul style="list-style-type: none"> Cooperating with construction service companies for the construction of employee housing and Estate C clinics. The contract is valid for 9 months. Payment of wages with a distribution system according to the contract value. PPE for contractor workers is provided by the company. Age of contractor workers between 27 – 45 years. All contractor workers have been registered with BPJS Employment and Health. There is no discrimination for contractor workers. There are no complaints regarding payments. Socialization related to safety driving, OHS aspects, and hazardous waste such as waste oil and used filters has been given to be deposited in the company's hazardous waste temporary storage. Complaints: materials are provided by the company, but often arrive late which affects the completion time. The longer the turnaround time, the higher the cost of living. 	<p>Related to this complaint, UoC had explained that the material got late due to the transportation, namely "<i>kapal tongkang</i>" which did not have a definite schedule and their availability is also unpredict. So for the materials especially sand, orders are made at once in large quantities to estimate the need for 6 months.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
	There was no alternative source of sand since no mining was found around the plantation.
<p>Related Social and Worker Welfare issues from the internet sourced from the following link:</p> <p>https://seputarpapua.com/view/pt-bia-diingatkan-agar-menyelesaikan-lima-persoalan.html Published on 22 October 2021</p> <p>Based on the statement stated in the link below, the Regent of Merauke remind the UoC to fulfil five matters as follows:</p> <ol style="list-style-type: none"> 1. Fulfilling resident documents such as identity card (KTP) and family card (KK). 2. Identify the number of migrant workers and local workers. 3. Regarding the corporate social responsibility, UoC need to share with the agencies related to empowerment to all indigenous communities. 4. Communicate the road construction to the Regent if the UoC meet any obstacle. 5. The fear of Regent of Merauke District that by the number of workers in PT BIA reached thousand workers, this would be disturbing communities order. 	<p>Related to the issues in the media, it was conveyed by the Regent of Merauke District when attending the validating of UoC's Collective Labor Agreement period of 2021 to 2023 in Merauke on 21 October 2021.</p> <p>UoC showed that they had collaborated with the Population and Civil Registration Agency to facilitate the ID cards making in the company area for example which was held on 12 to 13 June 2021, it stated that there was 112 workers got their new ID card.</p> <p>Regarding the recruitment process, UoC also has reported workers data to the Manpower Agency every month (excluded from the annual mandatory manpower report)</p> <p>Regarding the CSR programs, infrastructure programs and the communities order, UoC also has followed up and went directly to the villages around UoC's operational area by participating in communities' economy development, providing clean water facilities, and cooperating with the police to collaborate maintaining the security and communities order by implementing patrols related to common problems such as alcohol.</p>
<p>Related Social and Worker Welfare issues from the internet sourced from the following link:</p> <p>https://jubi.co.id/pt-bia-dinilai-diskriminatif-terhadap-orang-asli-papua/ Published on 8 November 2020</p> <p>Based on the statement stated in the link below, it stated that the UoC got judge discriminatory by one of the worker in PT BIA.</p>	<p>Related to the issue, UoC stated that they had empowered the Papua local communities by providing some training before doing work such as palm oil processing training and motorcycle riding which planned to do on the second week of September 2022 since the training in 2021 has been postponed due to the pandemic.</p> <p>Based on the interview with several local workers (OAP), they stated that they never felt discriminated against the company. UoC also provided some training before local communities recruited as worker in PT BIA.</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; margin-top: 100px;"> <div style="text-align: center;"> <p>PT Bio Inti Agrindo Management Representative</p>  <p>Bae Gyutae Ph.D Wednesday, 30 November 2022</p> </div> <div style="text-align: center;"> <p>MUTU International Lead Auditor</p>  <p>Hasiholan Sihombing Wednesday, 30 November 2022</p> </div> </div>

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

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Comm	Date of Contact	Response	
						Yes	No
1.	Environmental Service.	Merauke District	-	Via Phone	30 August 2022	✓	
2.	Selil Village, Kindiki Village and Mandekman Village Community	Merauke District	-	Direct Interview	30 August 2022	✓	
3.	Representatives of the Mahuse Milafo Clan	Merauke District	-	Direct Interview	30 August 2022	✓	
4.	Department of Food Crops, Horticulture, and Plantation	Merauke District	-	Via Phone	30 August 2022	✓	
5.	Land Office	Merauke District	-	Via Phone	30 August 2022	✓	
6.	Manpower Agency	Merauke District	-	Via phone	30 August 2022	✓	
7.	Representatives of the Mahuze Milafo Clan, Mahuze Kewam Clan, Mahuze Besar Clan, Kaku Clan and Gebse Clan	Merauke District	-	Direct Interview	30 August 2022	✓	
8.	Gender Committee of PT BIA	PT BIA - Merauke District	-	Direct Interview	30 August 2022	✓	
9.	Labor union of PT BIA	PT BIA - Merauke District	-	Direct Interview	30 August 2022	✓	
10.	Cooperative of Usaha Nusantara Bersatu Merauke	PT BIA - Merauke District	-	Direct Interview	30 August 2022	✓	
11.	Mandob Sejahtera Village Unit Cooperative	Merauke District	-	Direct Interview	30 August 2022	✓	
12.	CV MDC Bintang Bone - Contractor for Estate A, Estate B, POM 1, and POM 2	Merauke District	-	Direct Interview	03 September 2022	✓	
13.	PT Internusa Jaya Sejahtera – Supllier TBS	Merauke District	-	Direct Interview	05 September 2022	✓	
14.	CV Ilham Mandiri - Contractor of Estate B	Merauke District	-	Direct Interview	30 August 2022	✓	
15.	CV Mitchel Mandiri and CV Arif Rizki Jaya - C Estate Contractor	Merauke District	-	Direct Interview	30 August 2022	✓	
16.	POM 2 - Sortation - 4 Workers & 1 loader operator - Press - 1 Operator - Kernel - 1 Operator & 1 forclift operator - Engine room - 1 Operator - Boiler - 1 operator - IPAL - 1 Operator - EBA - 1 Operator - 1 WTP officer - 1 mechanical head - 1 warehouse officer - 2 security officers	PT BIA - Merauke District	-	Direct Interview	1 September 2022	✓	
17.	Estate B	PT BIA -	-	Direct Interview	1 September	✓	

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Comm	Date of Contact	Response	
						Yes	No
	<ul style="list-style-type: none"> - 1 grader Operator & 1 helper - Spraying - 2 worker & 2 foreman - Harvesting – 2 worker - Manuring - 7 workers & 2 foreman - Land Application - 2 Workers - Housing - 1 Worker - 2 warehouse officers - 2 occupants FFB loader – Contractor <ul style="list-style-type: none"> - 1 driver - 2 FFB loader 	Merauke District			2022		
18.	Estate C <ul style="list-style-type: none"> - Wood Tripe - The sprayer works by chopping wood (because it was raining earlier) - 8 workers & 1 foreman - Harvesting - 1 Harvester - Chemical Warehouse - 1 Officer - Fertilizer Warehouse - 1 Officer - Daycare - 1 Worker - Sparepart warehouse - 1 officer - 2 warehouse officers - 2 occupants 	PT BIA - Merauke District	-	Direct Interview	2 September 2022	✓	
19.	Plasma Division 3 <ul style="list-style-type: none"> - Manuring - 4 workers & 1 Foreman - Harvesting – 1 Harvester and his wife that helping loose fruit picking & 2 Foremans) - 2 occupants 	Merauke Regency	-	Direct Interview		✓	
20.	Aliansi Masyarakat Adat Nusantara	Jakarta	rumahaman@cbn.net.id	Via email	15 August 2022		✓
21.	Wahana Lingkungan Hidup Indonesia	Jakarta	informasi@walhi.or.id	Via email	15 August 2022		✓
22.	World Wide Fund	Jakarta	wwf-indonesia@wwf.or.id	Via email	15 August 2022		✓
23.	Sawit Watch	Bogor	info@sawitwatch.or.id	Via email	15 August 2022		✓

Appendix 2. Assessment Program

DATE	29 August – 7 September 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 29 August 2022		
00.05 – 09.35	JAKARTA → MERAUKE	All Auditor
10.00 – 16.00	From the airport to the audit location in Ulilin Sub Distric, Merauke District	All Auditor
16.00 – 17.00	OPENING MEETING <ul style="list-style-type: none"> Auditee Speech (Introduction of PIC, Profile of Certified Management Unit) Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification) 	Management of PT BIA All Auditor
Tuesday, 30 August 2022		
08.00 – 12.00	<ul style="list-style-type: none"> Stakeholders consultation to related agencies Stakeholder consultation to affected communities surrounding the plantations, indigenous peoples, local communities and previous land owners Interview with Gender Committee, Worker's Union, Worker's Cooperative (if any), Local Contractor (for Mill and Estate), Smallholders, Third Party Supplier (if any), local NGO (if any) 	All Auditor
12.00 – 14.00	Break	
14.00 – 16.30	<ul style="list-style-type: none"> Continuing stakeholder consultation (if anything was not done the previous day) Document Verification 	All Auditor
16.30 – 17.00	submission of audit progress	All Auditor
Thursday, 1 September 2022		
08.00 – 12.00	Field Observation to Estate B Aspect to be verified : <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries), HCV; Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect Implementation of Environmental, and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management), Observation of Workers Facilities (Housing, School, Worship Place). 	HHS SAS & MIA RAB
12.00 – 14.00	Break	
14.00 – 16.30	Field Observation to POM 2 <ul style="list-style-type: none"> Supply Chain verification (FFB Receiving, Weighbridge) Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect, security post, FFB Sorting, Processing Activity, Despatch CPO) 	HHS SAS & MIA

DATE	29 August – 7 September 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
16.30 – 17.00	<ul style="list-style-type: none"> Implementation of Environmental aspect, Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, POME Pond & land application <p>submission of audit progress</p>	RAB All Auditor
Friday, 2 September 2022		
08.00 – 12.00	Field Observation to Estate C and Plasma Division 2, 3 dan 4 Aspect to be verified : <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries), HCV; Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application), Implementation of Occupational Health & Safety Aspect, Implementation of Employment Procedure and Mechanism Aspect Implementation of Environmental, and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management), Observation of Workers Facilities (Housing, School, Worship Place). 	HHS SAS & MIA RAB
12.00 – 14.00	Break	
14.00 – 16.30	<ul style="list-style-type: none"> Continuing stakeholder consultation (if anything was not done the previous day) Document Verification 	All Auditor
16.30 – 17.00	submission of audit progress	All Auditor
Saturday, 3 September 2022		
08.00 – 12.00	<ul style="list-style-type: none"> Continuing stakeholder consultation (if anything was not done the previous day) Document Verification 	All Auditor All Auditor
12.00 – 17.00	Break	All Auditor
Sunday, 4 September 2022 – DAY OFF		
Monday, 5 September 2022		
08.00 – 12.00	<ul style="list-style-type: none"> Continuing stakeholder consultation (if anything was not done the previous day) Document Verification 	All Auditor
12.00 – 14.00	Break	
14.00 – 16.30	Document Verification	All Auditor
16.30 – 17.00	submission of audit progress	All Auditor
17.00 -	Internal discussion by auditor team preparing for Closing Meeting	All Auditor
Tuesday, 6 September 2022		
09.00 – 11.00	CLOSING MEETING <ul style="list-style-type: none"> Presentation of audit findings (Noteworthy Positive Component, Non-Conformities, OFI, Timeline of CAR's, Conclusion) Comments, Responses and Questions 	All Auditor

DATE	29 August – 7 September 2022	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
11.00 – 17.00	Travel from audit site to Merauke	All Auditor
Wednesday, 7 September 2022		
08.00 – 09.00	Travel from hotel in Merauke to the airport	All Auditor
10.30 – 16.55	MERAUKE → JAKARTA	All Auditor