

*Roundtable on Sustainable Palm Oil Certification
RSPO*

[✓] Surveillance

Name of Management Organisation : Tengkalat Palm Oil Mill, PT Gunung Pelawan Lestari subsidiary of MP Evans Group Plc.

Plantation Name : Tengkalat Estate; Gunung Pelawan Estate; Gelam Estate; Cemara Estate. Associated Smallholders: Mapur Mandiri Cooperative (Tengkalat KKPA); Ikhtiar Sejahtera Cooperative (Gunung Pelawan KKPA); Silip Lestari Cooperative (Gelam KKPA); Gunung Muda Sejahtera Cooperative (Cemara KKPA).

Location : Mapur Village, Riau Silip Sub-District, Bangka District, Kepulauan Bangka Belitung Province, Indonesia

Certificate Code : **MUTU-RSPO/102**

Date of Initial Registration : 24 November 2017

Date of Certificate Issue : 09 February 2023 Date of License Issue : 24 November 2023

Date of Certificate Expiry : 23 November 2027 Date of License Expiry : 23 November 2024

Assessment	Assessment Date	PT. Mutuagung Lestari Auditor	Reviewed by	Approved by
ASA-1.1	11 - 15 September 2023	Leonada(Lead Auditor Witnessing), Kiki Fadli (Lead Auditor Witnessed), Johannes Kapri Pandiangan, Rahmat Abdiansyah and Dinda Febrima Napitupulu.	Moh Arif Yusni	Octo HPN Nainggolan

Assessment	Approved by MUTUAGUNG LESTARI on:
ASA-1.1	13 October 2023

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Figure 1. Location Map of PT Gunung Pelawan Lestari

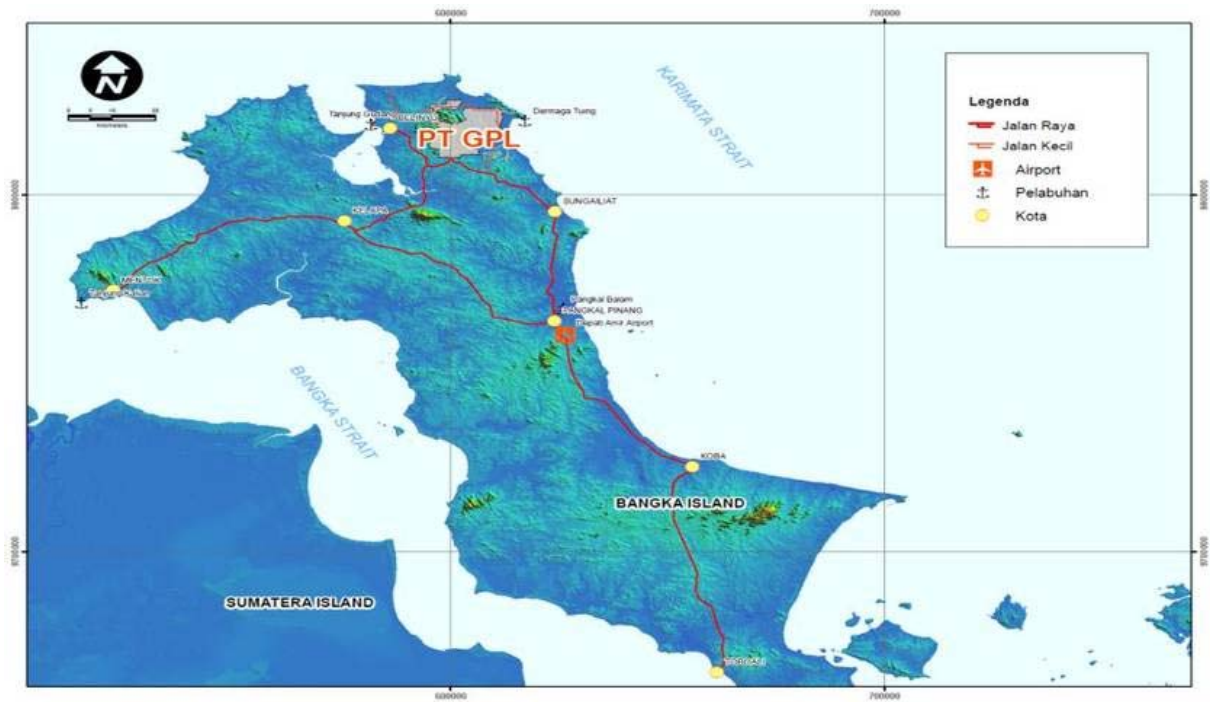
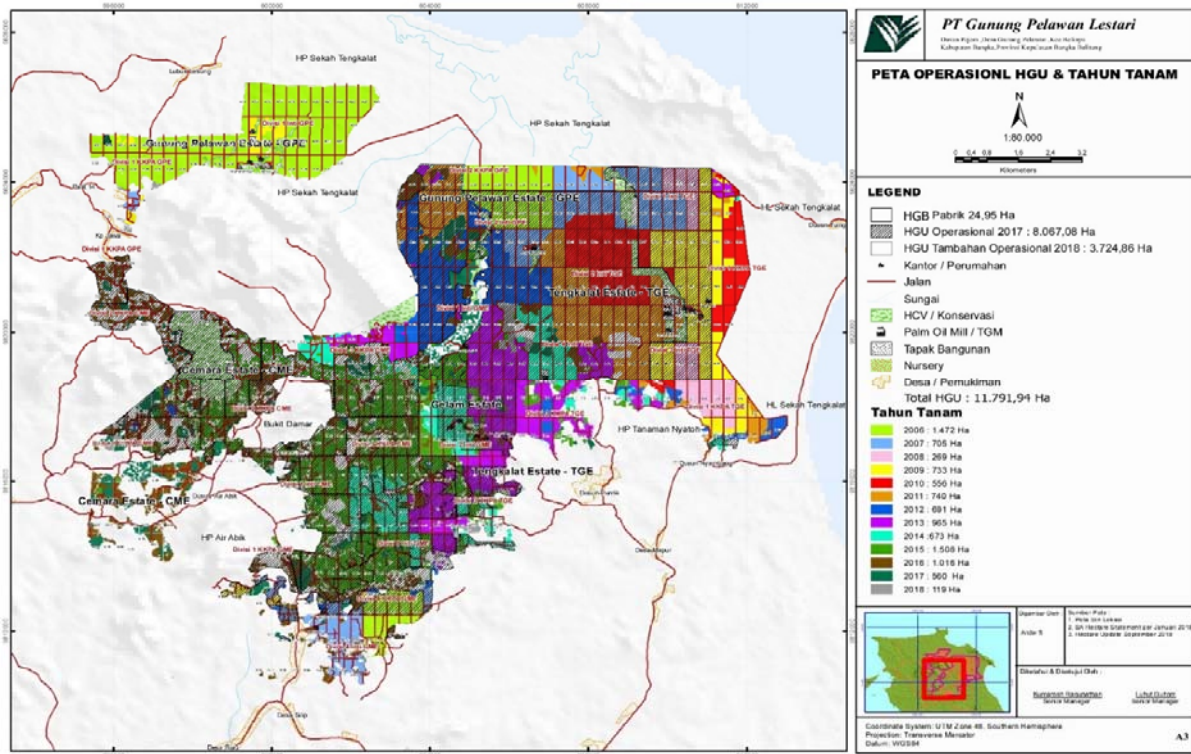


Figure 2. Operational Map of PT Gunung Pelawan Lestari



Abbreviations Used

BMP	:	Best Management Practices
BOB	:	Barn Owl Box
BOD	:	Biological of demand
BPJS	:	<i>Badan Penyelenggara Jaminan Sosial</i> (Social Security Administrator)
CB	:	Certification Body
CH	:	Certificate Holder
CLA	:	Collective Labor Agreement
CME	:	Cemara Estate
COD	:	Chemical of demand
CPO	:	Crude palm oil
CSR	:	Corporate Social Responsibility
CV	:	<i>Commanditaire Venootschap</i>
EFB	:	Empty Fruit Bunches
EIA	:	Environmental Impact Assessment
EM	:	Estate Manager
FFB	:	Fresh Fruit Bunch
ForDas	:	<i>Forum Daerah Aliran Sungai</i> (Watershed Forum)
FPIC	:	Free, Prior, Informed and Consent
GHG	:	Green House Gas
GM	:	General Manager
GME	:	Gelam Estate
GPE	:	Gunung Pelawan Estate
GPL	:	Gunung Pelawan Lestari
GPS	:	Global Positioning System
HCV	:	High Conservation Value
HGB	:	<i>Hak Guna Bangunan</i> (Building Use Title)
HGU	:	<i>Hak Guna Usaha</i>
HOOH	:	Head Of Operational Agronomy
IDR	:	Indonesian Rupiah
ILO	:	International Labour Organization
IPB	:	<i>Institut Pertanian Bogor</i>
ISPO	:	Indonesian Sustainable Palm Oil
Kep.	:	<i>Kepulauan</i> (Island)
KKPA	:	Cooperative credit for members. Smallholder's scheme which land owned by cooperative/smallholdings, but full developed and managed by the company.
KPKS	:	<i>Komisi Pengendalian Koperasi Simpan Pinjam</i> (Savings and Loan Cooperative Control Commission)
KTU	:	Kepala Tata Usaha (Head of Administration)
kWh	:	Kilowatt hour
LA	:	Land Application
LB3	:	<i>Limbah Berbahaya dan Beracun</i> (Hazardous Waste)
LD	:	Lethal Dosage
LTA	:	Lost Time Accident
MM	:	Mill Manager
MRM	:	Management Review Meeting
MSDS	:	Material Safety Data Sheet
NGO	:	Non-Government Organization
OFI	:	Opportunity for Improvement
OHS	:	Occupational Health and Safety
P2K3	:	<i>Panitia Pembina Keselamatan Dan Kesehatan Kerja</i> (OHS Committee)

PIC	:	Person In Charge
PK	:	Palm Kernel
PKWT	:	<i>Perjanjian Kerja Waktu tertentu</i> (Temporary worker)
PLC	:	Public Limited Company
PLN	:	<i>Perusahaan Listrik Negara</i> (State Electricity Company)
POM	:	Palm Oil Mill
POME	:	Palm Oil Mill Effluent
PPE	:	Personal Protective Equipment
PT	:	Limited Company
QC	:	Quality Control
R&D	:	Riset & Development
RKL-RPL	:	Environment management and Monitoring Plan
RSPO	:	Roundtable on Sustainable Palm Oil
RTE	:	Rare, Threatened, and Endangered
SHM	:	<i>Surat Hak Milik</i> (Freehold Title)
SIA	:	Social Impact Assessment
SPPHAT	:	<i>Surat Pelepasan Pengakuan Hak Atas Tanah</i> (letter of release acknowledging the right to land)
SKT	:	<i>Surat Keterangan Tanah</i> (land certificate)
SKU	:	<i>Syarat Kerja Umum</i> (Permanent worker)
SKU-H	:	<i>Syarat Kerja Umum- Harian</i>
SM	:	Senior Manager
SOP	:	Standard Operations Procedure
SPGPLM	:	<i>Serikat Pekerja Gunung Pelawan Lestari Mandiri</i>
SPK	:	<i>Surat Perjanjian Kerja</i> (Work Agreement)
SPSI	:	<i>Serikat Pekerja Seluruh Indonesia</i>
TGE	:	Tengkalat Estate
TGM	:	Tengkalat Mill
TM	:	<i>Tanaman Menghasilkan</i> (Mature Plant)
UoC	:	Unit of Certification
UPDKS	:	<i>Ulat Pemakan Daun Kelapa Sawit</i> (Palm leaf-eating caterpillars)
WHO	:	World Health Organization
WTP	:	Water Treatment Plan
WWTP	:	Waste Water Treatment Plant

1.0	SCOPE of the CERTIFICATION ASSESSMENT	
1.1	Assessment Standard Used	<ul style="list-style-type: none"> Principles and Criteria for Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20 April 2020. RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard Endorsed by the RSPO Board of Governors on 12 November 2020
1.2	Organisation Information	
1.2.1	Organisation name listed in the certificate	PT Gunung Pelawan Lestari subsidiary of M.P. Evans Group PLC
1.2.2	Contact person	Donald Ginting (Manager Sustainability & Certification)
1.2.3	Organisation address and site address	RSPO registered company: Gedung Graha Aktiva Lt. 10, Jl. HR Rasuna Said Kav. 03 Blok X-1, Kuningan, Jakarta Selatan Site: Mapur Village, Riau Silip Sub-District, Bangka District, Kepulauan Bangka Belitung Province, Indonesia
1.2.4	Telephone	021-52920338
1.2.5	Fax	021-52920339
1.2.6	E-mail	donaldg@mpevans.co.uk
1.2.7	Web page address	www.mpevans.co.uk
1.2.8	Management Representative who completed the application for certification	Donald Ginting
1.2.9	Registered as RSPO member	1-0027-06-000-00, October 08 th , 2006
1.3	Type of Assessment	
1.3.1	Scope of Assessment and Number of Management Unit	1 Palm Oil Mill (Tengkalat POM) and 8 supply bases: <ul style="list-style-type: none"> Gunung Pelawan Estate. Gunung Pelawan KKPA (Scheme Smallholders of Ikhtiar Sejahtera Cooperative). Tengkalat Estate. Tengkalat KKPA (Scheme Smallholders of Mapur Mandiri Cooperative). Cemara Estate. Cemara KKPA (Scheme Smallholders of Gunung Muda Sejahtera Cooperative). Gelam Estate. Gelam KKPA (Scheme Smallholders of Silip Lestari Cooperative).
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	
			Latitude	Longitude
	Tengkalat POM	Mapur Village, Riau Silip Sub-District, Bangka District, Kepulauan Bangka Belitung Province, Indonesia	S 01° 37' 18"	E 105° 59' 18"
1.4.2 Location of Certification Scope of Supply Base				
	Name of Supply Base	Location	Coordinate	
			Latitude	Longitude
	Gunung Pelawan Estate and Gunung Pelawan KKPA (Scheme Smallholders of Ikhtiar Sejahtera Cooperative with 525 members)	Gunung Pelawan Village, Belinyu Sub-District, Bangka District, Kepulauan Bangka Belitung Province, Indonesia	S 01° 35' 16"	E 105° 53' 54"
	Tengkalat Estate and Tengkalat KKPA (Scheme Smallholders of Mapur Mandiri Cooperative with 466 members)	Mapur Village, Riau Silip Sub-District, Bangka District, Kepulauan Bangka Belitung Province, Indonesia	S 01° 37' 26"	E 105° 59' 47"
	Cemara Estate and Cemara KKPA (Scheme Smallholders of Gunung Muda Sejahtera Cooperative with 1,169 members)	Gunung Muda Village, Belinyu Sub-District, Bangka District, Kepulauan Bangka Belitung Province, Indonesia	S 01° 38' 59"	E 105° 56' 31"
	Gelam Estate and Gelam KKPA (Scheme Smallholders of Silip Lestari Cooperative with 227 members)	Gunung Muda Village, Belinyu Sub-District, Bangka District, Kepulauan Bangka Belitung Province, Indonesia	S 01° 38' 59"	E 105° 56' 31"
1.5 Description of Area Statement				
1.5.1 Tenure				
	• State		11,818.21	Ha
	• Community		-	Ha
1.5.2 Area Statement				
	Descriptions	Own Estates (Ha)	Scheme Smallholder/ KKPA (Ha)	Total (Ha)
	Total area	7,131.83	4,686.33	11,818.21
	Mature area	6,151.36	3,881.18	10,032.54
	Roads	186.45	138.41	324.86
	Drains	19.95	6.63	26.58
	Buildings	44.48	0.80	45.28
	Conservation	334.55	120.14	454.69
	Others	368.77	539.17	907.94

Mill and Roads (HGB)		26.32		-		26.32				
*Others area is reserve area which can be used as planted area.										
1.6	Planting Year and Cycles									
1.6.1	Age profile of planting year									
	Planting Year	Hectarage (Ha)								
		GPE	GPE KKPA	TGE	TGE KKPA	CME	CME KKPA	GME	GME KKPA	Total
	2006	935.82	455.85	-	-	-	-	84.40	97.95	1,574.03
	2007	279.94	95.09	187.42	-	-	-	189.30	69.35	821.10
	2008	-	-	148.14	130.21	-	-	-	-	278.35
	2009	-	25.44	423.83	226.20	-	-	-	51.01	726.48
	2010	-	-	329.80	212.92	-	-	-	-	542.72
	2011	114.74	115.07	520.64	-	-	-	-	-	750.44
	2012	213.15	67.78	-	101.59	-	34.96	350.95	-	768.43
	2013	-	-	82.08	350.42	-	89.28	571.37	-	1,093.15
	2014	-	-	229.74	67.27	168.18	-	244.60	-	709.79
	2015	-	-	-	109.85	595.46	666.12	365.83	-	1,737.26
	2016	-	67.64	-	-	-	619.46	-	37.04	724.14
	2017	-	-	-	-	-	190.68	115.98	-	306.66
	TOTAL	1,543.65	826.87	1,921.65	1,198.46	763.64	1,600.50	1,922.43	255.35	10,032.54
1.6.2	New Planting area after January 2010			6,829.87 Ha						
1.6.3	Planting Cycle			1 st Cycle						
1.7	Description of Mill and Supply Base									
1.7.1	Description of Mill									
	Name of Mill	Capacity (tonnes/hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel				
				Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)			
	Tengkalat Mill	60	318,847.03	72,385.84	22.70	17,858.98	5.60			
*Production data source from September 2022 to August 2023										
1.7.2	Description of Certification Scope of Supply Base									
	Name of Estate	Total Area (Ha)	Production Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)	Supplied to Mill				
						FFB (tonnes/year)	%			
	Gunung Pelawan Estate	1,649.88	1,543.65	34,297.01	22.22	34,297.01	100			
	Gunung Pelawan KKPA (Scheme Smallholders of Ikhtiar Sejahtera Cooperative).	874.86	826.87	19,935.64	24.11	19,935.64	100			
	Tengkalat Estate	2,203.53	1,921.65	41,512.51	21.60	41,512.51	100			
	Tengkalat KKPA (Scheme	1,315.97	1,198.46	23,679.88	19.76	23,679.88	100			

	Smallholders of Mapur Mandiri Cooperative).						
	Gelam Estate	2,170.16	1,922.43	41,748.71	21.72	41,748.71	100
	Gelam KKPA (Scheme Smallholders of Silip Lestari Cooperative).	264.76	255.35	5,354.37	20.97	5,354.37	100
	Cemara Estate	1,108.31	763.64	17,663.26	23.13	17,663.26	100
	Cemara KKPA (Scheme Smallholders of Gunung Muda Sejahtera Cooperative).	2,230.74	1,600.50	31,695.04	19.80	31,695.04	100
	TOTAL	11,818.21	10,032.55	215,886.42	21.52	215,886.42	100
	<i>*Production data source from September 2022 to August 2023</i>						
1.7.3	FFB description from other source						
	Name of sources/Organisation (RSPO certified / non-certified)	Type of Organisation	Number of Smallholders	Production Area (Ha)	Supplied to Mill FFB (tonnes/year)		
	Non-Certified						
	CV Multi Nusa Pratama	FFB Agent	-	-	66,432.11		
	CV Tandan Pratama	FFB Agent	-	-	552.50		
	Suhendra Gunawan	FFB Agent	-	-	1,489.93		
	CV Cahaya Maras Abadi	FFB Agent	-	-	34,240.97		
	CV Anugrah Reyzatama Group	FFB Agent	-	-	420.65		
	TOTAL					103,136.16	
	<i>*Production data source from September 2022 to August 2023</i>						
1.7.4	Product categories			FFB, CPO, PK			
1.8	Tonnage of Product						
1.8.1	Past Annual Claim Certified Product		Estimate Production period of 24 Feb 2023 – 23 Nov 2023		Actual Production (MT) of previous audit Sep 22 – Aug 23		
	FFB Processed		260,000		215,886.42		
	CPO Production		62,400		56,047.68		
	Palm Kernel (PK) Production		14,300		13,917.52		
	<i>*CPO and PK production has been added to opening stock in August 2022</i>						
1.8.2	Product selling						
	Type of selling product		Actual selling product for last year (Sept 22 – Aug 23) (MT)				
	CSPO sold as RSPO certified product		37,403.69				
	CSPK sold as RSPO certified product		12,605.21				
	CSPO sold under other scheme		13,101.61				
	CSPK sold under other scheme		-				
	CSPO sold as conventional		-				
	CSPK sold as conventional		-				
1.8.3	Estimate of Certified FFB Claim						

Name of Estate(s)	Total Area (Ha)	Production Area (Ha)	FFB (tonnes/year)	Yield (tonnes/ha/year)
Gunung Pelawan Estate	1,649.88	1,543.65	35,503.95	23.00
Gunung Pelawan KKPA (Scheme Smallholders of Ikhtiar Sejahtera Cooperative).	874.86	826.87	19,018.01	23.00
Tengkalat Estate	2,203.53	1,921.65	44,197.95	23.00
Tengkalat KKPA (Scheme Smallholders of Mapur Mandiri Cooperative).	1,315.97	1,198.46	26,366.12	22.00
Gelam Estate	2,170.16	1,922.43	16,659.97	21.82
Gelam KKPA (Scheme Smallholders of Silip Lestari Cooperative).	264.76	255.35	30,409.50	19.00
Cemara Estate	1,108.31	763.64	48,060.75	25.00
Cemara KKPA (Scheme Smallholders of Gunung Muda Sejahtera Cooperative).	2,230.74	1,600.50	6,383.75	25.00
TOTAL	11,818.21	10,032.54	226,600.00	22.59

*Production data source from September 2023 to August 2024

1.8.4 Estimate of Certified Palm Product Claim

Name of Mill	Capacity (tonnes/ hour)	FFB Processed (tonnes/year)	CPO		Palm Kernel		Supply Chain Module
			Out put (tonnes)	Extraction (%)	Out put (tonnes)	Extraction (%)	
Tengkalat POM	60	226,600	51,600	22.77	12,600	5.56	MB

*Production data source from September 2023 to August 2024

1.9 Other Certifications

ISO 9001:2008	-
ISO 14001: 2004	-
OHSAS 18001:2007	-
ISCC	EU-ISCC-Cert-DE119-62229409 valid until 17 November 2023
ISPO	MUTU-ISPO/180 valid until 21 August 2024

1.10 Time Bound Plan

1.10.1 Time Bound Plan for Other Management Unit

Management Unit		Estate (Supply Base)	Time Bound Plan	Location	Status
MILL	Time Bound Plan				
Pangkalan	2012	Pangkalan Estate (PT Pangkatan Indonesia)	2012	Labuhanbatu District, Sumatera Utara Province	Certified

		Sennah Estate (PT Sembada Sennah Maju)	2012	Labuhanbatu District, Sumatera Utara Province	Certified
		Bilah Estate (PT Bilah Plantindo)	2012	Labuhanbatu District, Sumatera Utara Province	Certified
Bumi Permai	2013	PT Prima Mitrajaya Mandiri	2013	Kutai Timur District, Kalimantan Timur Province	Certified
		Koperasi Subur Makmur	2013	Kutai Timur District, Kalimantan Timur Province	Certified
		Koperasi Sawit Etam Bersama	2013	Kutai Timur District, Kalimantan Timur Province	Certified
		Koperasi Tanah Sama	2013	Kutai Timur District, Kalimantan Timur Province	Certified
		Koperasi Mitra Sawit Mandiri	2013	Kutai Timur District, Kalimantan Timur Province	Certified
		Koperasi Grenseng Indah	2013	Kutai Timur District, Kalimantan Timur Province	Certified
		Koperasi Maju Membangun	2013	Kutai Timur District, Kalimantan Timur Province	Certified
		PT Teguh Jaya Prima Abadi	2013	Kutai Timur District, Kalimantan Timur Province	Certified
		Koperasi Karya Bersama	2013	Kutai Timur District, Kalimantan Timur Province	Certified
		Koperasi Mitra Sejahtera Abadi	2013	Kutai Timur District, Kalimantan Timur Province	Certified
		Rahayu	2022	PT Teguh Jaya Prima Abadi	2013
Koperasi Karya Bersama	2013			Kutai Timur District, Kalimantan Timur Province	
Koperasi Mitra Sejahtera Abadi	2013			Kutai Timur District, Kalimantan Timur Province	
Koperasi Maju Membangun II	2025			Kutai Timur District, Kalimantan Timur Province	Have not obtained the HGU
Koperasi Sawit Etam Bersama II	2025			Kutai Timur District, Kalimantan Timur Province	Have not obtained the HGU
Koperasi Tanah Sama II	2025			Kutai Timur District, Kalimantan Timur Province	Have not obtained the HGU
Benuang	2025 Non Certified (Commi sioning 2021)	Ara Estate	2025	Kutai Timur District, Kalimantan Timur Province	Non-Certified (currently send FFB to outsider mill)
		Benuang Estate	2025	Manubar Village, Sandaran Sub-District, Kutai Timur District, Kalimantan Timur Province, Indonesia	
		Cendana Estate	2025	Marukangan Village, Sandaran Sub-District, Kutai Timur District, Kalimantan Timur Province, Indonesia	
		Damar Estate	2025	Susuk Luar Village, Sandaran Sub-District, Kutai Timur District, Kalimantan Timur Province, Indonesia	
		Koperasi Dugai Jaya Mandiri	2025	Kutai Timur District, Kalimantan Timur Province	

		Koperasi Marukangan Sejahtera Mandiri	2025	Kutai Timur District, Kalimantan Timur Province	
		Koperasi Jaya Harapan Bersama	2025	Kutai Timur District, Kalimantan Timur Province	
Tengkalat	2017	PT Gunung Pelawan Lestari	2017	Bangka District, Kepulauan Bangka Belitung Province	Certified
		Koperasi Ikhtiar Sejahtera	2017	Bangka District, Kepulauan Bangka Belitung Province	Certified
		Koperasi Silip Lestari	2017	Bangka District, Kepulauan Bangka Belitung Province	Certified
		Koperasi Mapur Mandiri	2017	Bangka District, Kepulauan Bangka Belitung Province	Certified
		Koperasi Gunung Muda Sejahtera	2017	Bangka District, Kepulauan Bangka Belitung Province	Certified
Kenanga	2025 Non Certified	Tengkawang Estate	2025	Remayu Village, Tuah Negeri Sub-District, Musi Rawas District, Sumatera Selatan Province, Indonesia	Non- Certified
		Tamarind Estate	2025	Lubuk Ngin Village, Selangit Sub-District, Musi Rawas District, Sumatera Selatan Province, Indonesia	Non- Certified
		Meranti Estate	2025	Jaya Tunggal Village, Tuah Negeri Sub-District, Musi Rawas District, Sumatera Selatan Province, Indonesia	Non- Certified
		Kenanga Estate	2025	Simpang Gegas Temuan Village, Tiang Pumpung Kepungut Sub-District, Musi Rawas District, Sumatera Selatan Province, Indonesia	Non- Certified
		Koperasi Serba Usaha Perkebunan Kelapa Sawit - Perigi Jaya	2025	Remayu Village, Tuah Negeri Sub-District, Musi Rawas District, Sumatera Selatan Province, Indonesia	Non- Certified
		Koperasi Serba Usaha Perkebunan Kelapa Sawit - La Maju Besar	2025	Jaya Tunggal Village, Tuah Negeri Sub-District, Musi Rawas District, Sumatera Selatan Province, Indonesia	Non- Certified
		Koperasi Produsen - Petunang Bumi Sempurna	2025	Remayu Village, Tuah Negeri Sub-District, Musi Rawas District, Sumatera Selatan Province, Indonesia	Non- Certified
		Koperasi Serba Usaha Perkebunan Kelapa Sawit - Lubuk Ngin Bersatu	2025	Petunang Village, Tuah Negeri Sub-District, Musi Rawas District, Sumatera Selatan Province, Indonesia	Non- Certified
		Koperasi Serba Usaha Perkebunan Kelapa Sawit - Suro Sejahtera	2025	Lubuk Ngin Village, Selangit Sub-District, Musi Rawas District, Sumatera Selatan Province, Indonesia	Non- Certified

		Koperasi Serba Usaha Perkebunan Kelapa Sawit - Gegas Makmur	2025	Suro Village, Muara Beliti Sub-District, Musi Rawas District, Sumatera Selatan Province, Indonesia	Non- Certified
		Produsen - Berlian Lestari Jaya Cooperative	2025	Simpang Gegas Temuan Village, Tiang Pumpung Kepungut Sub-District, Musi Rawas District, Sumatera Selatan Province, Indonesia	Non- Certified
		Koperasi Serba Usaha Perkebunan Kelapa Sawit - Peneban Lestari	2025	RT.002/RW.002, Leban Jaya Village, Tuah Negeri Sub-District, Musi Rawas District, Sumatera Selatan Province, Indonesia	Non- Certified
		Koperasi Serba Usaha Perkebunan Kelapa Sawit - Babat Sejahtera	2025	Babat Village, Suku Tengah Lakitan Ulu Sub-District, Musi Rawas District, Sumatera Selatan Province, Indonesia	Non- Certified
	-	PT Evans Lestari	2025	Musi Rawas District, Sumatera Selatan Province	Currently FFB delivered to outside mill
	-	PT Simpang Kiri Plantation Indonesia	2025	Aceh Province	Currently FFB delivered to outside mill
Note: TBP approved by Evans Group on 7 July 2023					
1.10.2	Progress of Associated Smallholders and Outgrowers for Certifiable Standard				
All smallholders of PT Gunung Pelawan Lestari has been certified since 2017 together with the own Estates.					

2.0	ASSESSMENT PROCESS
2.1	Assessment Team
ASA-1.1	<p>1. Leonada (Lead Auditor Witnessing). Bachelor of Agriculture, Department of Agricultural Cultivation, Faculty of Agriculture, Plant Breeding and Seed Technology Study Program, Bogor Agricultural University. Has more than five years working experience as a plantation operations and sustainability staff in a private Indonesian oil palm plantation company. Trainings that have been attended include: Indonesian Sustainable Palm Oil (ISPO) Auditor Training, RSPO Lead Auditor, ISO 17021; 2011, ISO 17065; 2012, ISO 19011; 2011, ISO 9001 Lead Auditor; 2008, ISO 14001; 2005, Training Management Deployment Program Agronomy, analysis base solution for operation, Training on peat management for oil palm, Training on Integrated Plant Pest and Weed Control (IPM), Training on Limited Use of Pesticides, Training on Pesticide and Fertilizer Waste Management, Mediation training and conflict resolution, training for General OSH Expert, OHS management system Auditor and currently working for an independent certification body as an auditor. In this audit activity he witnessed Kiki Fadli as part of RSPO Lead Auditor Development Programs.</p> <p>2. Kiki Fadli (Auditor Witnessed). Indonesian citizen, Bachelor of Agricultural Engineering, Agricultural Engineering Study Program. Has experience working in the Department of Sustainability in private and state-owned oil palm plantations. Has attended ISPO New Refreshment Lead Auditor training, RSPO Lead Auditor, General OHS Expert, ISO 9001:2008, ISO 14001:2015, ISO 17021, ISO 17065, HCV, OHS management system and ISH Lead auditor training organized by RSPO. In this audit activity, an assessment of the legal aspects of land, SCCS aspect, TBP aspect, partial certification aspect, environment aspect, GHG, HCV and land disputes aspects was carried out.</p> <p>3. Johannes Kapri Pandiangan (Auditor). Bachelor of Agriculture, Department of Agricultural Social-Economics, Faculty of Agriculture. Has 7 years of experience working as operational staff in one of the leading private oil palm plantation companies in Indonesia. The training that has been attended includes Forest and land fire emergency response training by BKSDA Riau Province, IHT ISPO P&C Certification System, IHT Awareness ISO 17021 and 17065, IHT Awareness RSPO, ISO 14001: 2015 Lead Auditor Training, and ISO 9001:2015 Lead Auditor Training During this audit he verify Best Management Practices and OHS</p> <p>4. Rahmat Abdiansyah (Auditor). Indonesian citizen, Bachelor of Forestry from the Department of Forest Resources Conservation and Ecotourism, Bogor Agricultural University. 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 verified Worker Welfare and Transparencies</p> <p>5. Dinda Febrima Napitupulu (Auditor Trainee). Bachelor of Social and pursuing her Double Degree Master Program in Environmental Science at Padjadjaran University Bandung and University of Twente The Netherlands. Experienced as Sustainability Officer, Internal Auditor for Environmental Management System (ISO 14001), and OHSAS 18001. She has participated in Quality Management System (ISO 9001), ISPO and RSPO trainings. During the audit, she verified the environment aspect, GHG and HCV under the supervision of 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-1.1	<p>Number of auditors: 3 auditors, 1 Lead Auditor Witnessing and 1 trainee auditor</p> <p>Number of days for ASA-1.1 at site: 5 days</p> <p>Number of working days for ASA-1.1 at site: 15 Working days</p>
2.2.2	Assessment Process
ASA-1.1	The assessment was conducted by measuring the sufficiency of implementation with the consistency done by the Tengkalat Palm Oil Mill, PT Gunung Pelawan Lestari subsidiary of MP Evans Group Plc to the requirements of 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 and RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, Endorsed by the RSPO Board of Governors on 12 November 2020.

The scope of certification of Tengkalat Palm Oil Mill, PT Gunung Pelawan Lestari subsidiary of MP Evans Group Plc consist of one mill (Tengkalat POM) and eight supply bases : Tengkalat Estate, Gunung Pelawan Estate, Gelam Estate, Cemara Estate; associated smallholder; Mapur Mandiri Cooperative (Tengkalat KKPA); Ikhtiar Sejahtera Cooperative (Gunung Pelawan KKPA); Silip Lestari Cooperative (Gelam KKPA); Gunung Muda Sejahtera Cooperative (Cemara KKPA).

The audit program is included as Appendix II. The approach to the audit was to treat the mill and its supply base as an 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-1.1 delivered by the MUTU auditor to the management unit and the results are the subject will be verified at the next assessment phase (ASA-1.2). Improvement of findings from RC were observed by auditors at this ASA-1.1 assessment. All information obtained was recorded in Check List of PT Mutuagung Lestari (MUTU) and part of ASA-1.1.

Number of units in this certification activity is 1 (one) Mill and 8 (eight) supply bases, namely 4 estates and 4 plasmas. The auditor team uses the formula $(\sqrt{y}) \times (z)$ to determine the sampling units to focus on and also considers the issues raised by stakeholders (if the number of units is less than 4), (y) is the number of estates and (z) the multiplier determined by the risk assessment. The risk assessment is influenced by geographic location, plantation distance, labor complexity, landscape setting, presence of HCVs, number of communities/conflicts, and legality. Based on this, the auditor team determined the sampling locations to be one mill (Tengkalat POM) and eight supply bases : Tengkalat Estate, Gunung Pelawan Estate, Gelam Estate, Cemara Estate; associated smallholder; Mapur Mandiri Cooperative (Tengkalat KKPA); Ikhtiar Sejahtera Cooperative (Gunung Pelawan KKPA); Silip Lestari Cooperative (Gelam KKPA); Gunung Muda Sejahtera Cooperative (Cemara KKPA).

The opening meeting was held on September 11, 2023, at Meeting Room Office. As for the participants who attended the opening meeting included Group Manager, Mill/Estate Manager, Support Team from Jakarta and other staff at Estate and Mill units. Closing meeting was held on September 15, 2023, which was attended by the same participants as the opening meeting. Management Tengkalat Palm Oil Mill, PT Gunung Pelawan Lestari subsidiary of MP Evans Group Plc accept all the ASA-1.1 audit results.

Interviews were conducted with male workers, female workers and staff directly at factory and plantation workplaces in person or via teleconference (if the stakeholders could not be found). Field workers were interviewed informally in small groups in the field. Company officials were not present at internal or external stakeholder interviews. The list of stakeholders contacted is listed in Appendix 1.

The assessment program please find Appendix 2.

2.2.3	Locations of Assessment
ASA-1.1	<p>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:</p> <p>Tengkalat POM</p> <ul style="list-style-type: none"> • Security Post. Field observations and interviews related to employment and OHS aspects.

- **Weighbridge.** Field observations and interviews related to employment aspects.
- **St. Grading.** Field observations and interviews related to OHS, BMP and Employment aspects.
- **Despatch.** Observations and interviews related to OHS aspects and product delivery.
- **CPO tank.** Observations and interviews related to OHS aspects and CPO storage.
- **WWTP.** Observation on WWTP, indication of waste overflow, OHS implementation, and interview with worker about worker welfare, OHS, and company's policies.
- **Empty Bunch Area.** Observation of the management of EFB to composting management the production process of mill.
- **WTP.** Observations and interviews related to water management, recording of water use, health checks, PPE and waste management.
- **Composting Area.** Observation of the management of Solid waste consist of EFB, fibre and shell from the production process of mill.
- **Housing Tengkalat POM.** Observations and interviews related to public facility, access to water and electricity, and domestic waste management.
- **Oil warehouse.** Field observations and interview related chemical management, OHS, and environmental aspect.
- **Chemical warehouse.** Field observations and interview related chemical management, OHS, and environmental aspect.
- **Hazardous waste temporary warehouse.** Field observations and interview related to hazardous management, OHS, and environmental aspect.
- **Spare part Warehouse.** Field observations and interview related spare part management, OHS, and environmental aspect.
- **Workshop.** Field observations workshop activity, OHS, environmental and worker welfare aspect.
- **Sterilizer station .** Observations and interviews related to the FFB processing process, product quality, losses, OHS aspects and employment.
- **Press station .** Observations and interviews related to the FFB processing process, product quality, losses, OHS aspects and employment.
- **Boiler Station.** Observations and interviews related to operations, understanding emergency response, OHS and employment aspects.
- **Engine Room.** Observations and interviews related to operations, understanding emergency response, OHS and employment aspects.
- **Loading ramps.** Observations and interviews related to operations, understanding emergency response, OHS and employment aspects.
- **Hydrant.** Observations related to emergency response facilities and infrastructure.

Tengkalat Estate

- **HCV 1.3, 4.1, 42. Block E46.** Field observations related to the implementation of management and monitoring in HCV areas.
- **HCV 6. Block 49.** Field observations related to the implementation of management and monitoring in HCV areas.
- **Land Application and monitoring well. Block G42.** Observations and interviews related to LA and monitoring well management.
- **Landfill. Block G42.** Observation related to waste management.
- **Fertilizer Warehouse.** 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.
- **Material warehouse.** Observation minimum stock of PPE.
- **Firefighting warehouse.** Observation related to OHS and firefighting facilities.
- **Workshop.** Observations and interviews with officers related to material handling, work procedures, OHS, wages and environmental management.
- **Hazardous and Toxic Waste Storage.** Observation related to hazardous waste management, OHS and environmental aspect.
- **Pesticide mixing area.** Observation related pesticide mixing area, PPE storage, safety aspect.

- **Rinse House.** Observations related to the management of agrochemical materials and waste, MSDS, emergency response facilities and types of pesticides used.
- **Daycare, Mapur Housing Area.** Observations and interviews with workers related to labor and OHS aspects.
- **Housing Area, Mapur.** Observation of the availability of infrastructure such as employee housing facilities, clean water facilities, and waste management.
- **Clinic.** Observation of the health facility, medical waste management, and OHS.
- **Harvest and lose fruit Collect. Block H47.** Field observations and interviews with harvesters regarding employment, OHS, complaints and others.
- **Slashing Weeding. Block H48.** Field observations and interviews with workers regarding employment, OHS, complaints and others.
- **Subsidence Pole and Piezometer. Block E52.** Observation regarding peat management.

Tengkalat KKPA

- **HGU stake No. KOP 159, KOP 135 and KOP 139.** Observations and interviews with PICs regarding monitoring of HGU stakes, land boundaries, and potential land disputes/conflicts with community/external parties.
- **Harvest and lose fruit Collect. Block J50 Division 1.** Field observations and interviews with harvesters regarding employment, OHS, complaints and others.
- **Subsidence Pole and Piezometer. Block E54.** Observation regarding peat management.
- **FFB loading. Block J50 Division 1.** Field observations and interviews with FFB loaders and drivers regarding employment, OHS, complaints and others.

Gelam Estate

- **HGU stake No. GPL 40 and GPL 41 Block Q21.** Observations and interviews with PICs regarding monitoring of HGU stakes, land boundaries, and potential land disputes/conflicts with community/external parties.
- **HCV Block F34 and F38 areas.** Field observations related to the implementation of management and monitoring in HCV areas in the form of river borders.
- **Harvest, Block J30 Division 2.** Field observations and interviews with harvesters regarding employment, OHS, complaints and others.
- **Spray, Block J34 Division 1.** Field observations and interviews with spray officers regarding technical work, environmental management, employment, OHS, complaints and others.
- **Selective Weeding, Block J29 Division 2.** Field observations and interviews with maintenance employees regarding technical work, environmental management, employment, OHS, complaints and others.
- **Chemical Storage.** Observation and interview with worker related to OHS, environmental and worker welfare aspect.
- **Hazardous and Toxic Waste Storage.** Observation related to hazardous waste management, OHS and environmental aspect.
- **Housing Silir Division.** Observations and interviews related to public facility, access to water and electricity, and domestic waste management.

Gelam KKPA

- **Harvest, Block P24.** Field observations and interviews with harvesters regarding employment, OHS, complaints and others.

Gunung Pelawan Estate

- **HGU stake No. GPL 247 Block C48 and GPL 253 Block C50.** Observations and interviews with PICs regarding monitoring of HGU stakes, land boundaries, and potential land disputes/conflicts with community/external parties.
- **Fire monitoring tower, Div 1 Block E40.** Observation related OHS implementation and monitoring fire.
- **HGU stake No. GPL 56, GPL 59 and GPL 61.** Observations and interviews with PICs regarding monitoring of HGU stakes, land boundaries, and potential land disputes/conflicts with community/external parties.
- **HCV Block C45 areas.** Field observations related to the implementation of management and monitoring in HCV areas in the form of river borders.
- **Ex-mining Block E34.** Observation related the area condition.

- **Landfill Block E35 division 2.** Observation related to waste management.
- **Harvest and lose fruit Collect. Block C04/C05.** Field observations and interviews with harvesters regarding employment, OHS, complaints and others.
- **Selective weeding. Block B20.** Field observations and interviews with workers regarding employment, OHS, complaints and others.
- **Beneficial Plant. Block B20.** Field observations related to biological pest control.

Gunung Pelawan KKPA

- **HGU stake No. KOP 303 Block C54 and KOP 307 Block C54.** Observations and interviews with PICs regarding monitoring of HGU stakes, land boundaries, and potential land disputes/conflicts with community/external parties.
- **Harvest and lose fruit Collect. Block C5.** Field observations and interviews with harvesters regarding employment, OHS, complaints and others.
- **Barn Owl. Block B14.** Field observations related to biological pest control.
- **FFB loading. Block C19.** Field observations and interviews with FFB loaders and drivers regarding employment, OHS, complaints and others.

Cemara Estate

- **Fertilizer Warehouse.** 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.
- **Material warehouse.** Observation minimum stock of PPE.
- **Firefighting warehouse.** Observation related to OHS and firefighting facilities.
- **Workshop.** Observations and interviews with officers related to material handling, work procedures, OHS, wages and environmental management.
- **Pesticide mixing area.** Observation related pesticide mixing area, PPE storage, safety aspect.
- **Rinse House.** Observations related to the management of agrochemical materials and waste, MSDS, emergency response facilities and types of pesticides used.
- **Daycare, G13.** Observations and interviews with workers related to labor and OHS aspects.
- **Housing Area, G13.** Observation of the availability of infrastructure such as employee housing facilities, clean water facilities, and waste management.
- **Landfill, L22.** Observation of the domestic waste management.
- **HGU Pole No. GPL 25** Observations and interviews with PICs regarding monitoring of HGU stakes, land boundaries, and potential land disputes/conflicts with community/external parties.
- **Harvest and lose fruit Collect. Block K20 Division 1.** Field observations and interviews with harvesters regarding employment, OHS, complaints and others.
- **Spraying, Block L16 Division 1.** Field observations and interviews with spray officers regarding technical work, environmental management, employment, OHS, complaints and others.
- **Barn Owl. Block K17 Division 1.** Field observations related to biological pest control.
- **FFB loading. Block K21 Division 1.** Field observations and interviews with FFB loaders and drivers regarding employment, OHS, complaints and others.

Cemara KKPA

- **HGU Pole No KOP 158 block L11 and KOP 161 Block L10.** Observations and interviews with PICs regarding monitoring of HGU stakes, land boundaries, and potential land disputes/conflicts with community/external parties.
- **HCV area. Block J13.** Field observations related to the implementation of management and monitoring in HCV areas in the form of river borders.
- **Harvest and lose fruit Collect, Block J13.** Field observations and interviews with harvesters regarding employment, OHS, complaints and others.

2.3	Stakeholder Consultation and Stakeholders Contacted
2.3.1	Summary of stakeholder consultation process.
ASA-1.1	<p>Summary of stakeholder consultation process for PT Gunung Pelawan Lestari was held by:</p> <ul style="list-style-type: none"> • Public Notification on website on MUTU Website on 28 August 2023 • Public consultation meeting with government institution of Bangka District 11 September 2023 • Public consultation meeting with communities (Silip Village and Gunung Pelawan Village) on 12 September 2023 • Public consultation meeting with internal stakeholders and contractors on 12 September 2023 • Public consultation with NGOs (by email) such as WALHI, WWF, AMAN, and Sawit Watch on 5 September 2023 <p>Numbers of input from stakeholders were clarified by PT Gunung Pelawan Lestari.</p>
2.3.2	Stakeholder contacted
	Please find appendix 1
2.4	Determining Next Assessment
	The next visit (ASA-1.2) will be conducted eight (8) months to twelve (12) months after certificate issued

3.0 ASSESSMENT FINDINGS

3.1 Summary of Assessment Report of the RSPO Certification

MUTUAGUNG LESTARI has conducted an assessment of **Tengkalat POM – PT Gunung Pelawan Lestari subsidiary of Evans** operation consisting of one (1) mill and four (4) oil palm estates and four (4) scheme smallholders.

During the assessment, there was three (3) opportunities for improvement were identified. Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5.

Further explanation of the non-conformities raised and corrective actions taken by the company are provided in section 3.5.

MUTUAGUNG LESTARI found that Tengkalat Palm Oil Mill, PT Gunung Pelawan Lestari subsidiary of MP Evans Group Plc operation complied with the requirements of RSPO Certification Systems for Principles & Criteria and RSPO Independent Smallholder Standard, endorsed by the RSPO Board of Governors on 12 November 2020 and Indonesia National Interpretation of Principles and Criteria for Sustainable Palm Oil Production 2018, endorsed on 20th April 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	<p>PT GPL has SOP on Information Transparency number GPL/SOP/Umm-02 revision 1 on 4 September 2013. It explains the mechanism for public communication as well as a list of publicly accessible documents and limited documents. The following are examples of publicly accessible documents:</p> <ul style="list-style-type: none"> • Company vision and mission • Company policy • Company procedures • UKL UPL report, <i>Amdal</i> (Environmental Impact Assessment) • HCV report and management plan • and other documents in accordance with RSPO guidelines <p>The company has documents related to mandatory reports which sent to relevant government agencies, for instance: Environment Management and Monitoring (<i>RKL-RPL</i>) Report of PT GPL first semester 2023 submitted to Environment Agency Bangka Regency on 28 July 2023 with letter number 48/GPL-SC/SRT/VII/2023 and also reported to Ministry of Environment with electric signed 1689394772-3765.</p> <p>Based on interviews with Gunung Pelawan Village, Silip Village, local contractors (PT Wana Eka Bina Manunggal), and internal stakeholders (gender committee Tengkalat POM and all estates), it is known that the company has conducted socialization regarding the procedures for requesting information and has assigned a person in charge to respond. Each party also knows the types of general information that can be accessed.</p>
1.1.2	<p>The company has also reported several mandatory reports to relevant stakeholders, for example:</p> <ul style="list-style-type: none"> • Report on the use and utilization of HGU and HGB for 2022 submitted to the Bangka Regency Land Office on January 10 2023.

- Report on the development of plantation businesses for the second quarter of 2023 which was submitted to the Bangka Regency Food and Agriculture Service on July 14 2023.
- Report on investment activities for Mill and Plantations for the second quarter of 2023 which was submitted to the Ministry of Investment/Investment Coordinating Board on 5 July 2023.
- Report for RKL RPL first semester 2023 was submitted on 28 July 2023 with letter number 48/GPL-SC/SRT/VII/2023 to Environmental Agency Bangka Regency and also reported to Ministry of Environment with electric signed 1689394772-3765.
- Reporting of Employment Report for PT Gunung Pelawan Lestari-Tengkalat POM via online in 2022 on 1 November 2022 and must be reporting back on 1 November 2023.
- Reporting of Employment Report for PT Gunung Pelawan Lestari-Tengkalat Estate via online in 2022 on 1 November 2022 and must be reporting back on 1 November 2023.
- Reporting of 1 contract worker in PT GPL to the Manpower Agency of Bangka District on 5 June 2023.
- Quarter 4 2022 OHS Committee Report to the Bangka Belitung Province Manpower Office on January 24, 2023.
- Quarter 1 2023 OHS Committee Report to the Bangka Belitung Province Manpower Office on April 12, 2023.
- Quarter 2 2023 OHS Committee Report to the Bangka Belitung Province Manpower Office on July 7, 2023.

Those documents are provided in appropriate language. Based on explanation above, the company has provided information in appropriate language and accessible to relevant stakeholders.

1.1.3

The company records requests for information from stakeholders in documents of Incoming and Outgoing Letters of External Stakeholders. The book has information on the date of incoming letter, subject, and the date of the letter's response. Based on document review of information request in 2022-2023, there is no information request from any government agency. The incoming letters are invitation to several events and funding proposal to PT GPL. For instance: funding proposal for Islamic event from Belinyu Subdistrict on 3 April 2023 and it was responded on 15 April 2023.

Based on the interview with Gunung Pelawan and Silip Villages as well as to Environment Agency Bangka Regency, it was known that there was no information request in 2023. The company has submitted the mandatory report to relevant agencies as mentioned in indicator 1.1.2.

1.1.4

The company has mechanism for handling complaints from internal and external stakeholders in the Internal and External Complaints SOP document no GPL/SOP/Umum-05 on 25 April 2013. It explains regarding resolution to each complaint both internal and external stakeholders properly. The SOP states the procedures for instance:

- Every complaint, both internal and external, must be informed in the complaint book before further processing.
- Apart from the complaint book, the company also receives complaint letters or from other internal and external sources. Complaint letters or books are submitted through the head of each unit.
- Within 2 weeks, the unit head is obliged to find a solution by considering the existing facts.
- If it is not resolved by the unit head, it will be forwarded in writing to senior manager.
- The senior manager is obliged to resolve it within 2 weeks and schedule a meeting.
- If it is not completed, it will be forwarded to the Legal/HR Manager in the head office.
- Legal/HR Manager must complete it within 2 weeks.
- If the complaint cannot be resolved by the Legal/HR manager, the complaint can be taken to the higher legal department.

The company has the complaint records from internal and external stakeholders. Based on the document review, there was no complaint in 2022-2023. Based on interviews with Gunung Pelawan Village, Silip Village, local contractors (PT Wana Eka Bina Manunggal), and internal stakeholders (gender committee Tengkalat POM and all estates), it is known that was no complaint in 2022-2023.

1.1.5.

PT Gunung Pelawan Lestari has a stakeholder list for 2023. The stakeholders list is for mill, own estate and scheme smallholders. It informs the stakeholders representative, positions, and phone number. The external stakeholders such as: Environmental Agency Bangka Regency, the Village Head (example: Gunung Pelawan Village and Silip Village), Police

Department, BPJS Health Facilities, NGOs, educational institutions, Suppliers, Contractors (PT Wana Eka Bina Manunggal-CPO transporter), Management and Supervisors of Cooperatives (Ikhtiar Sejahtera, Silip Lestari, Gunung Muda Sejahtera, Mapur Mandiri), and previous land owners.

The information provided in the stakeholder list can be confirmed when the auditor team contacted them for interview during ASA 1.1. such as to Gunung Pelawan Village, Silip Village, local contractors (PT Wana Eka Bina Manunggal - CPO Transporter).

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 Policy on Sustainability and Business Ethics in October 2021. It's explained that, the group committed to not employ underage workers, prohibit all workers from corruption, bribery and fraudulent use of funds and resources, prohibit any forced labor and human trafficking, etc.

UoC's code of ethics had been socialized to the workers and contractors, for example: the socialization carried out on 22 June 2023 to workers and contractor workers. Based on the interview with workers and contractor, it's known that they had a good understanding towards code of ethic policy. Based on explanation above, company has policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.

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.

1.2.2
A comprehensive system for monitoring compliance and implementation of ethical business policies and practices was carried out through the Internal Audit and Management Review, for instance: the last RSPO and ISPO internal audit of Tengkalat POM which was conducted on 7 August 2023 with 6 nonconformity found. UoC also showed the mechanism in implementation UoC's policy as state 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.

In addition, UoC also showed the evaluation of regulation compliance in each aspect, for instance: the evaluation of environmental related regulation of PT GPL updated in August 2023. The list of regulation mentioned all applicable regulations in environmental aspect, such as: Minister of Environment and Forestry Regulation No. 1 of 2021 concerning the Company performance rating assessment program in environmental management (PROPER).

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 dispute solution No. HRD-SOP15-01 which explained activities of dispute identification, dispute analysis, dispute management planning, dispute handling implementation, monitoring, evaluation and reporting.
- SOP No. GPL/SOP/Uмум-05 dated on 25 April 2013 concerning in handling internal and external complaints. The policy explained about the company's procedure of handling and documenting any complaints.

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 a list of regulations for 2023 which includes regional regulations and national regulations which are updated annually. The list of laws/regulations listed includes several aspects such as land permits and legality, employment, occupational health and safety, best management practices and the environment. Some examples of compliance with regulations that have been carried out include:

Legal Aspect

- The company has a Plantation Business License (IUP) Bangka Regent Decree No. 188.45/554/Dishutbun/2015 dated March 2 2015. This permit is for integrated palm oil with plantation product processing industry businesses covering an area of 11,157 hectares in Gunung Pelawan Village, Gunung Muda Village, Belinyu District, Silip Village and Mapur Village, Silip District with a processing capacity of 60 tons FFB/Hour.
- The company also indicated the issuance of a plantation business permit through OSS on April 5 2021 which has become effective, explaining that in the attachment to the approval of the suitability of space utilization activities for business activities with No. 09032210211901011 dated March 2 2022 for an oil palm plantation with an area of 13,565 Ha.
- Document of the latest changes to PT GPL's Company Data based on the Deed of Shareholders' Decree on Amendments to PT GPL's Articles of Association No. 15 dated 21 June 2017 which was registered with the Ministry of Law and Human Rights on 7 July 2017 with company registration No. AHU-0083463.AH.01.11 of 2017 dated July 7 2017. At the time the audit took place there had been no changes to the Company Deed.
- The company has implemented Minister of Agriculture Regulation No. 26 of 2007 regarding plasma which already has a community cooperation development partnership, namely with Perkebunan Kelapa Sawit Ikhtiar Sejahtera Cooperative, Perkebunan Kelapa Sawit Silip Lestari Cooperative, Perkebunan Kelapa Sawit Mapur Mandiri Cooperative and Perkebunan Kelapa Sawit Gunung Muda Sejahtera Cooperative.

Environmental Aspect

- Environmental permit in accordance with the Decree of the Regent of Bangka No. 188.45.154.2/LH/2014 concerning environmental permits for plantation activities and palm oil processing mill in Silip Village and Mapur Village, Riau Silip District and in Gunung Muda Village and Gunung Pelawan Village. Belinyu District, Bangka Regency, Kepulauan Bangka Belitung Province, PT Gunung Pelawan Lestari.
- PT Gunung Pelawan Lestari has permit to utilize POME for land application based on the Decree of the Head of DINPMP2KUKM Bangka Regency number 188.4/01/IPAL/DINPMP2KUKM/IV/2019 on 1 April 2019 and valid for 5 years.
- The company has permit for water utilization based on the Decree of Ministry of Public Works and Housing number 837/KPTS/M/2023 on 28 July 2023 and valid for 5 years.
- Temporary storage for hazardous and toxic waste permit has expired on 9 September 2021. Based on the environmental technical directive no S.620/POLU/P2T/PLAY/5/2022 from Ministry of Environmental and Forestry on 12 Mei 2022, regarding this permit, if there is no hazardous and toxic waste storage facility changing, so the previous permit is valid as the temporary storage for hazardous and toxic waste technical detail document. Afterwards, PT GPL should propose the environmental approval changing with no obligation to make new environmental document. It could be with Environmental Feasibility Letter or the release of Environmental Management Capability Statement approval through Integrated Service Ministry of Environmental and Forestry. UoC has shown the progress regarding approval feedback with letter number 174/DIR-GPL/IX/2023 on 1 September 2023. Hazardous and toxic waste categories based on the permit such as contaminated hazardous and toxic waste, battery waste, oil waste, electronic waste, filter waste, and rug waste.

Manpower Aspect:

- UoC has implemented a minimum wage and the fulfillment of overtime wages.
- UoC already has and implements a pay scale structure in accordance with Minister of Manpower Regulation No. 01 of 2017.
- There was no illegal labor, underage labor and forced labor systems.
- UoC has registered all workers in health insurance and social security insurance.
- All core job or permanent job were for permanent workers.
- UoC had registered their contract worker in Manpower Agency, for instance: Reporting of 1 contract worker in PT GPL to the Manpower Agency of Bangka District on 5 June 2023.

BMP

In term of best management practices, it was known that estate and mill management has implementing several pursuance with Indonesia laws and regulations, for example has conducting mechanical or zero burning method during land clearing, palms planted were derived from seeds (DxP) producers, recognized by the government of Indonesia. Furthermore, estate (each unit management) has implementing integrated pest management, biological control and only used pesticides listed on government website pesticide.id.

OHS

The company has an OHS organization at PT Gunung Pelawan Lestari as stated in the Decree of the Head of the Bangka Belitung Islands Province Manpower Service Number: 188.4/011/P2K3/DISNAKER/2023 concerning Ratification of the Occupational Safety and Health Advisory Committee (P2K3) at PT Gunung Pelawan Lestari May 31 2023 with the OHS Committee secretary in the name of YS (initials).

2.1.2

The Company has a mechanism to identify, implement and evaluate compliance with the law as outlined in "SOP for the Implementation of Applicable Laws and Regulations" No. GPL/SOP/Uumum-01, dated 7 August 2012. This procedure explains the PIC who is responsible for identifying regulations and the PIC who is responsible for evaluating regulations. Responsible for updating regulatory changes are the Legal Manager and Sustainability & Certification Manager.

This procedure states that monitoring and updating of legal regulations is carried out every year for each aspect, for example plantations, employment, the environment, etc.

The company has also carried out evaluations of regulatory compliance every year, for example the last one was carried out on August 2023 which has evaluated the latest regulations such as Government Regulation in Lieu of Law no. 2 of 2022 concerning job creation. Apart from the company internally, the company also periodically evaluates the legal compliance of contractors working with the company and this is explained in more detail in indicator 2.2.2.

2.1.3

The company has HGU Stake Maintenance procedures as stated in document No. GPL/SOP/Uumum-14 dated 7 August 2012 which explains that maintenance of HGU boundary marks is carried out periodically every 6 months by monitoring and checking the physical condition of the boundary marks by officers appointed by the plantation management.

The company shows monitoring documents for HGU stakes, for example on June 5 2023 in Gelam Estate and Cemara Estate which has provided complete information regarding the stake number, stake condition, stake location, stake coordinates and repair actions as well as repair time targets if there are damaged or missing stakes. In the monitoring report, it is known that all HGU stakes are available, with details at Gelam Estate/KKPA as many as 61 stakes and Cemara Estate/KKPA as many as 95 stakes.

Based on field visits to HGU stakes, for example to Cemara Estate/KKPA at stake No. GPL 25 Block K15, No. KOP 161 Block L10, No. KOP 158 Block L11 and Gelam Estate/KKPA at stake No. GPL 41 and 42 Block Q21, it is known that all HGU stakes are in place and according to their coordinates and are well maintained.

	Status: Comply	
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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 several activities of main estate and plasma, as follows:

- Tengkalat POM collaborated with 3 contractors, there were PT Valten Cahaya Anugrah collaborated in hazardous waste transport, PT Wana Ekabina Manunggal collaborated in CPO transporting, and CV Pilar Tangguh Persada collaborated in construction.
- Cemara Estate collaborated with 1 contractor; KKPS Gunung Muda Sejahtera collaborated in FFB transport.

- Gunung Pelawan Estate and Tengkalat Estate collaborated with 2 contractors, there were PT Valten Cahaya Anugrah collaborated in hazardous waste transport and CV Berkah Abadi Makmur collaborated in FFB and EFB transport.

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

- Work Agreement of KPKS Gunung Muda Sejahtera with PT Gunung Pelawan Lestari (No. GPL/CME/06/2023/090) for cooperating in FFB and loose fruit transport dated on 21 June 2023 which is valid until 31 December 2023.
- Work Agreement of CV Berkah Abadi Makmur with PT Gunung Pelawan Lestari (No. GPL/GPE/06/2023/085) for cooperating in FFB and loose fruit transport dated on 21 June 2023 which is valid until 31 December 2023
- Work Agreement of PT Wana Ekabina Manunggal with PT GPL (No. GPL/TGM/2016/01) for cooperating in CPO transport dated on 15 May 2022 which is valid until 15 May 2028.
- Work Agreement of CV Pilar Tangguh Persada with PT GPL (No. GPL/GPE/06/2023/071) for cooperating in security office renovation dated on 15 June 2023 which is valid until 15 August 2023. The collaboration was done during the audit.

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, etc. 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 FFB suppliers regarding the compliance to the existing regulation, for example the evaluation of CV Berkah Abadi Makmur for the period of 2 January to 20 June 2023. There were several important indicators in the evaluation for example the work quality, the punctuality, compliance with regulations and laws (BPJS and provision of minimum wages), implementation of OHS, waste management, compliance with the environmental regulation, and compliance with business ethics.

Based on the interviews with contractor (KPKS Gunung Muda Sejahtera), and documents verification, it's revealed that workers had received wages and were registered in the BPJS program. For example:

- Proof of wage payment period of August 2023 for KPKS Gunung Muda Sejahtera on behalf of SP (initial) who received wages Rp. 6,994,200 (above the minimum wage).
- Proof of wage payment period of August 2023 for KPKS Gunung Muda Sejahtera on behalf of FHP (initial) who received wages Rp. 6,068,250 (above the minimum wage).
- Proof of wage payment period of July 2023 for PT Wana Ekabina Manunggal on behalf of AH (initial) who received wages Rp. 4,195,060 (above the minimum wage).
- BPJS *Ketenagakerjaan* (Social Security Insurance) payments for PT Wana Ekabina Manunggal 126 contractor workers (including 20 contractor workers placed in PT GPL) have been completely fulfilled and the last proof of payment is on 9 August 2023 for period of August 2023.

2.2.3

UoC showed that on each work agreement between the unit of certification and the contractor, there were an appendix stated the 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 labor, underage worker, and not to employ workers from human trafficking.

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 contractor 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 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 receives FFB directly from nucleus and plasma plantations, namely:

- Gunung Pelawan Estate and KKPA (Koperasi Ikhtiar Sejahtera) are RSPO certified
- Tengkalat Estate and KKPA (Mapur Mandiri Cooperative) are RSPO certified
- Gelam Estate and KKPA (Silip Lestari Cooperative) are RSPO certified
- Cemara Estate and KKPA (Gunung Muda Sejahtera Cooperative) are RSPO certified

2.3.2

Based on document verification, it is known that the company also receives FFB indirectly from agents around the company. The FFB sources come from:

- CV Multi Nusa Pratama
- CV Tandan Pratama
- Suhendra Gunawan
- CV Cahaya Maras Abadi
- CV Anugrah Reyzatama Group.

Companies can show geolocation information and proof of land ownership from FFB suppliers, for example as follows:

- CV Anugrah Reyzatama Group consisting of 15 farmers with a land area of 61.9 Ha with proof of land ownership in the form of SKT, SPPHAT and SHM. For example, the geolocation information for farmers with the initials AS is with coordinates (X: 105.647154 Y: -1.880620168) and an area of 1 Ha.
- CV Multi Nusa Pratama which consists of 176 farmers with a land area of 907.2 Ha with proof of land ownership in the form of SKT, SPPHAT and SHM. For example, the geolocation information for farmers with the initials HSM is with coordinates (X: 105.847875 Y: -1.880620168) and an area of 1.5 Ha.

Based on production delivery records, it is known that it is normal for third party production to be sent, for example for CV Anugrah Reyzatama Group which has an area of 61.9 Ha with production September 2022 - August 2023 is 420.65 tons so the yield is 6.8 tons/ha. Based on interviews with company management, it was stated that the company periodically monitors agents who send FFB to Mill by always updating the independent farmers who supply their FFB.

Based on the results of interviews with CV Multi Nusa Pratama and the Gunung Muda Sejahtera Cooperative, it is known that the company has taken the coordinates of the member farmers' plantations.

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 long-term plan explains the projected FFB production, CPO and PK production, OER and KER projections, operational cost projections and revenue projections which includes all units at PT Gunung Pelawan Lestari, including Estate, Mill and Plasma. An example is the projection for 2024, as follows:

- FFB production: 257,456 tons
- CPO production: 81,327 tons
- OER projection: 24.1%

- PK projection: 18,223 tons
- KER projection: 5.40%

Evaluation of the long-term plans that have been prepared is also carried out during the preparation of the annual budget and implementation of management reviews.

3.1.2

Based on the results of field visits and document studies, it is known that the oldest plant age was in 2007 and has not yet entered the replanting age, so the company does not have a replanting plan for the next 5 years.

3.1.3

The company has carried out management reviews every year for both the results of internal operational audits and internal sustainability audits. The management review activities for the internal operational audit results report were carried out on May 19 2023 and the results of the internal sustainability audit report on August 9 2023. The management review was carried out on August 18 2023, and discussed the following matters:

- Internal audit results;
- Feedback from customers;
- Process performance and product suitability;
- Status of preventive and corrective actions;
- Follow-up resulting from management reviews;
- Changes that may affect the management system; And
- Recommendations for improvement.

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

3.2.1

Best Management Practice and OHS Aspect

- Carry out an inspection of the use of PPE to ensure that the PPE of employees has been used and in accordance with procedures.
- CH does not use chemicals with the active ingredient paraquat.
- Internal operational audit to monitor compliance with company procedures.
- RSPO internal audit carried out on 7 August 2023 and there were 6 discrepancies and these have been corrected by the company. management review will be carried out on August 9 2023 for the Mill and Estate units.

Environmental Aspect

- Optimize renewable energy by utilizing fiber and shell as boiler fuel.
- The company has biogas plant to generate electricity.
- EFB management on composting station.
- Implementation of environmental aspect management and monitoring in first semester 2023 in accordance with the management and monitoring matrix and report it to the relevant agencies.
- Identify GHG sources and perform GHG calculations using the RSPO GHG. Detail explanation in indicator 7.10.1.

3.2.2

Certification Unit 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	: MP Evans Group PLC
RSPO Membership Number	: 1-0027-06-000-00
Name of Certified Unit	: Tengkalat Palm Oil Mill
Name of Certification Body	: PT Mutuagung Lestari
RSPO PalmTrace ID Number	: RSPO_PO1000000283
Supply Chain Model	: Mass Balance (MB)

Number of Mills	:	1
Number of Estates	:	8
Production Area (ha) - Estate	:	10,033
Certified Area (ha) - Estate	:	11818
High Conservation Value (HCV) Area (ha)	:	455
Peatlands - Planted (ha)	:	780
Peatlands - Unplanted (ha)	:	110
Additional side aside river buffer (ha) that are not part of the above HCV areas	:	0
Freshwater Usage per PO produced tonne	:	4,55

Based on the results of verification and comparison of the matrix template with several other documents, it shows that the area data is in accordance with the basic information and results of the HCV study. Other data related to employment, production, supply chain is also in accordance with related documents.

Status: Comply

3.3

Operating procedures are appropriately documented, consistently implemented and monitored.

3.3.1

Plantation SOP has been indicated by the representative of the certification unit in the Guidebook for Technical Cultivation of PT Evans Indonesia. These documents include, among others, nursery, land clearing, planting oil palm, planting legumes, conserving water and soil, immature plants, controlling weeds, pests and diseases, maintaining productive crops, fertilizing, harvesting and transporting, vehicles and heavy equipment, replanting, water management, compost applications, POME applications. Example: Nursery SOP (AGR-SOP01-01), released on March 3, 2020, explaining the activities of the location requirements for nurseries, nurseries, to transport of seedlings.

The certification unit shows the SOP of the factory, including weighing, grading, processing at each station, up to the receipt and release of CPO. for example, grading SOP with document number SOP / 6.1 / 2, revision 1, dated January 1, 2017, with the approval of the Mill Manager.

Based on the results of field visits and interviews with both Estate and Mill workers, it is known that workers understand the company's work procedures. An example is the results of interviews with spray workers in block J34 Division I Gelam Estate. It was found that workers were able to explain spraying procedures such as not spraying in river border areas, not spraying against the wind and being required to use appropriate PPE when working.

3.3.2

The company has a mechanism to check the mechanism for implementing procedures consistently through internal operational audit activities and internal sustainability audits. Internal audit activities cover all activities carried out by the company (both Estate, Mill and plasma), including the performance of contractors who collaborate with the company. The internal operational audit activities are:

- Internal operational audit report for semester 1 of 2023 for Cemara Estate which was carried out on 31 March – 3 April 2023.
- Internal operational audit report for semester 1 of 2023 for Gelam Estate which was carried out on 28 - 30 March 2023.
- Internal operational audit report for semester 1 of 2023 for Gunung Pelawan Estate which was carried out on 4 – 6 April 2023.
- Internal operational audit report for semester 1 of 2023 for Tengkalat Estate which was carried out on 4 – 6 April 2023.
- Internal operational audit report for semester 1 of 2023 for Tengkalat POM which was carried out on 16 – 19 May 2023.

Apart from that, the company has also carried out an internal sustainability audit for each Estate and Mill which was carried out during August 2023. One example is the internal sustainability audit report for Tengkalat POM which was carried out on August 7 2023 with 6 findings and all non-conformance findings have been fulfilled on August 28, 2023.

3.3.3

The company has a mechanism to check the mechanism for implementing procedures consistently through internal

operational audit activities and internal sustainability audits. Internal audit activities cover all activities carried out by the company, including the performance of contractors who collaborate with the company. The internal operational audit activities are:

- Internal operational audit report for semester 1 of 2023 for Cemara Estate which was carried out on 31 March – 3 April 2023.
- Internal operational audit report for semester 1 of 2023 for Gelam Estate which was carried out on 28 - 30 March 2023.
- Internal operational audit report for semester 1 of 2023 for Gunung Pelawan Estate which was carried out on 4 – 6 April 2023.
- Internal operational audit report for semester 1 of 2023 for Tengkalat Estate which was carried out on 4 – 6 April 2023.
- Internal operational audit report for semester 1 of 2023 for Tengkalat POM which was carried out on 16 – 19 May 2023.

Apart from that, the company has also carried out an internal sustainability audit for each Estate and Mill which was carried out during August 2023. One example is the internal sustainability audit report for Tengkalat POM which was carried out on August 7 2023 with 6 findings and all non-conformance findings have been fulfilled on August 28, 2023. An example of a non-conformity found during an internal sustainability audit activity is in indicator 6.7.2 where there is a foreman who does not carry a first aid kit when working in the field. The follow-up/improvement carried out by the company was to complete a first aid kit for the foreman. The non-conformity was declared fulfilled on September 7, 2023.

	Status: Comply	
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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 several documents related to social and environmental impact studies which are conducted independently and in participatory approach by involving affected stakeholders. Some of the documents include:

Environmental Aspect

The company has environmental documents AMDAL (KA-ANDAL, Environmental Impact Analysis, RKL and RPL) covering an area of 17,000 hectares which was approved by the Head of Bapedalda of Bangka Belitung Province on 2 April 2008 with a capacity of 60 tons of FFB/hour. In 2014, the company made an AMDAL addendum (ANDAL, RKL, and RPL) related to the change in the location permit which was previously around 17,000 ha to 13,565 ha with a mill capacity of 60 tons FFB/hour. There was a change for wastewater treatment system from a palm oil mill that is integrated with a biogas installation as a renewable alternative source of electrical energy (PLTB) and the remaining effluent is utilized for land applications. The environmental feasibility is in accordance with the Decree of the Regent of Bangka no. 188.45/154.1/LH/2014 concerning Environmental Feasibility of Plantation and Palm Oil Processing Mill Activities (Addendum ANDAL and RKL-RPL) by PT Gunung Pelawan Lestari. In addition, the company has also obtained an environmental permit in accordance with the Decree of the Regent of Bangka No. 188.45.154.2/LH/2014 concerning environmental permits for plantation activities and palm oil processing mill in Silip Village and Mapur Village, Riau Silip District and in Gunung Muda Village and Gunung Pelawan Village. Belinyu District, Bangka Regency, Kepulauan Bangka Belitung Province, PT Gunung Pelawan Lestari.

The company has HCV management plan listed in the Management and Monitoring Plan of HCV for 2021 – 2023. The management plan was prepared based on the results of a management plan review for the previous period which was conducted in a participatory approach involving the surrounding community and employees and was reported to BKSDA Bangka. The HCV management implementation in 2022-2023, such as:

- Socialization of HCV and the environment to the community in November 2022.
- Training on animal monitoring for employees in October 2022.
- Reforestation in HCV 1, 3, and 4 in October 2022 and May 2023.
- Maintenance for HCV sign board in HCV 1, 3, 4, 6 in August 2022, December 2022, and April 2023.
- Training on mitigation conflict with animals in December 2022, and April 2023.
- Socialization of HCV and the environment to the employees in December 2022, and April 2023.
- HCV patrol once a month.
- Monitoring for no chemical application in river border once a month.

Social Aspect

PT Gunung Pelawan Lestari conducted Social Impact Assessment in April 2013 by Aksenta. The area assessed was 13,565 ha (including KKPA). SIA covers several aspects, for instance: livelihood, health, education, culture and religion. The consultation held involving affected parties with a participatory approach. Based on the attendance list on 16 January 2013, there 69 participants. In the SIA document it is explained that the implementation method is carried out by interview, group discussion/FGD and observation. All social impact issue has identified in the stakeholders consultation.

External issue:

- Land tenure: The village location is still in the forest production and conservation area & villagers concern on less land to cultivate due to the palm oil plantation development.
- Issue regarding the economic situation based on tin industry: tin is still considered as the priority income, the community willingness to cultivate land by farming, and palm oil as the alternative economic after tin.
- Issue regarding the partnership scheme: different prespective in the partnership scheme, partnership cooperative adds the community income, and the cooperative partnership's benefit is not evenly distributed.
- Issue regarding the ethnic pluralism and religion: difference in ethnic and religion as conflict potential.
- Issue regarding the indigenous people "Lom" : the cultural exotism of indigenous people "Lom" potentially raise social sympathy and solidarity.
- Issue regarding local politic: Local politic affects the community's social condition and Public figure has the potential to influence the community.

Internal issue:

- The actual location permit status is not legitimated enough to maximize the areal development because it near the tin mining PT Timah.
- The appreciation from PT GPL to cultivate their land in the permitted location as a positif aspect in areal development that concerns on the community.
- Managerial and operational issue of the smallholder cooperative in nearby villages which creates a system distrust.
- Community empowerment program is still sporadic and not effectice to the surrounding villages.

Based on document verification, it is known that the scope of the social impact assessment has covered all villages, farmers, and has involved internal employees. The company has implemented social management and monitoring plans, such as:

- Socialization, briefing, and meeting of stakeholders and the community around the company.
- Facilities for consultation and communication with stakeholders and the community around the company.
- Employment information in surrounding villages. Currently there are 1,034 local workers working in the company.
- CSR program.
- Socialization of company policies, environment, employment and OHS to employees.
- Strengthening of trade unions among employees.
- Providing PPE to employees.
- Housing construction and repairment.
- Medical check up and social security facilities.
- Enclave area and ex mining area.

3.4.2**Environment**

Based on document review, it can be concluded that all management and monitoring parameters demanded in environmental documents have been implemented. Environmental Management and Monitoring (RKL RPL) aspect in the submitted report to Environmental Agency as follow: air quality, odour increased, noise intensity, potential fire and explotion, hazardous and toxic waste, surface water quaity, soil quality, groundwater quality, biodiversity, employment opportunity, OHS, community health, community's shifting perception and attitude. The company has evaluated each significant impact for monitoring parameter that is applied as required in KepmenLH 45 2005, which includes an evaluation of trends, evaluation of critical levels, and evaluation of compliance. Based on the evaluation results, it is known that all parameters are still suitable by the related Quality Standards, and there is no indication of contamination.

The implementation of environmental management has been carried out in accordance with all RKL-RPL documents and PT GPL's Environmental Permits. The environmental management report is conducted every semester and submitted to

Environmental Agency Bangka Regency. The updated report for the first semester 2023 was submitted on 28 July 2023 with letter number 48/GPL-SC/SRT/VII/2023. It was reported to Ministry of Environment with electric signed 1689394772-3765. Based on the report, it can be concluded that there is no negative impact caused by the company.

The company has HCV management plan listed in the Management and Monitoring Plan of HCV for 2021 – 2023. The management plan was prepared based on the results of a management plan review for the previous period which was conducted in a participatory approach involving the surrounding community and employees and was reported to BKSDA Bangka. The HCV management implementation in 2022-2023, such as:

- Socialization of HCV and the environment to the community on 15 November 2022 regarding firefighting program, HCV, and environmental programs to the stakeholders. The event was attended by 60 participants from Gunung Muda Village, Gunung Pelawan Village, Silip Village, Mapur Village, KKPA Gunung Muda Sejahtera, KKPA Mapur Mandiri, KKPA Silip Lestari, and KKPA Ikhtiar Sejahtera.
- Training on animal monitoring for employees in October 2022.
- Reforestation in HCV 1, 3, and 4 in October 2022 and May 2023.
- Maintenance for HCV sign board in HCV 1, 3, 4, 6 in August 2022, December 2022, and April 2023.
- Training on mitigation conflict with animals in December 2022, and April 2023.
- Socialization of HCV and the environment to the employees in December 2022, and April 2023.
- HCV patrol once a month.
- Monitoring for no chemical application in river border once a month.

Social

The company has SIA management plan for July 2022 - June 2025. It was created based on the results of SIA report in 2013 and recommendation from pervious evaluation. Participatory approach in SIA management plan was conducted in June 2021 by FGD with the surrounding community. The FGD participants were from Gunung Muda Village, Silip Village, Gunung Pelawan Village, gender committee, local NGO (*Pemuda Pancasila*) and Mapur Village. SIA management plan for July 2022 – June 2025 including:

- CSR (once a month)
- Employment (tentative)
- Housing construction and repairment (once a year or based on the housing condition)
- Internships for local students (tentative)
- Smallholder cooperative (Sept 2023, Dec 2023, March 2024, and June 2024)
- Medical Check Up for employees (Oct 2023)
- Providing PPE for employees (once a month)
- First aid kits on site (once a month)
- OHS training (July 2023, Feb 2024, May 2024)
- Stakeholder meetings (Dec 2023)
- Monitoring enclave area (once a month)
- Action plan for SIA 2023-2024 (Dec 2023).

Most of the program plan has been implemented in accordance with the schedule in 2023. Although in the initial plan, SIA evaluation will be conducted every 3 years, it means the comprehensive evaluation will be held in 2025, but the company and relevant stakeholders always conduct a review every year to evaluate the action plan.

3.4.3

Environment

The company has submitted RKL RPL report for first semester in 2023 to Environment Agency Bangka Regency in 28 July 2023 with letter number 48/GPL-SC/SRT/VII/2023 and to the Ministry of Environment with electronic signed number 1689394772-3765. The implementation of Environmental Management and Monitoring is conducted in accordance with the explanation as described in indicator 3.4.1. The effectiveness of environmental management and monitoring can be confirmed from the results of environmental management and monitoring analysis. It means the management and monitoring plans are in sync with the actual implementation.

Environmental Management and Monitoring (RKL RPL) aspect in the submitted report to Environmental Agency as follow:

air quality, odour increased, noise intensity, potential fire and explosion, hazardous and toxic waste, surface water quality, soil quality, groundwater quality, biodiversity, employment opportunity, OHS, community health, community's shifting perception and attitude. The company has evaluated each significant impact for monitoring parameter that is applied as required in KepmenLH 45 2005, which includes an evaluation of trends, evaluation of critical levels, and evaluation of compliance. Based on the evaluation results, it is known that all parameters are still suitable by the related Quality Standards, and there is no indication of contamination.

Based on the field observations, it can be seen that the company has implemented environmental management in accordance with RKL-RPL, for instance by installing signboard for conservation areas, prohibits hunting protected animals. Based on the interview result with sprayer and fertilizer workers, they also stated that they were aware of the prohibition on applying chemicals to the buffer zone or river border.

The company has HCV management plan listed in the Management and Monitoring Plan of HCV for 2021 – 2023. The management plan was prepared based on the results of a management plan review for the previous period which was conducted in a participatory approach involving the surrounding community and employees and was reported to BKSDA Bangka. The HCV management implementation in 2022-2023, such as:

- Socialization of HCV and the environment to the community in December 2022.
- Training on animal monitoring for employees in October 2022.
- Reforestation in HCV 1, 3, and 4 in October 2022 and May 2023.
- Maintenance for HCV sign board in HCV 1, 3, 4, 6 in August 2022, December 2022, and April 2023.
- Training on mitigation conflict with animals in December 2022, and April 2023.
- Socialization of HCV and the environment to the employees in December 2022, and April 2023.
- HCV patrol once a month.
- Monitoring for no chemical application in river border once a month.

Social

Comprehensive SIA evaluation for planning in July 2022 – June 2025 will be evaluated in 2025. Nevertheless, the company and relevant stakeholders conduct a review every year to evaluate the action plan. The updated evaluation was held on 15 November 2022 in participatory approach. The participants for the event were from Gunung Muda Village, Gunung Pelawan Village, Silip Village, Mapur Village, KKPA Gunung Muda Sejahtera, KKPA Mapur Mandiri, KKPA Silip Lestari, KKPA Ikhtiar Sejahtera, and Environmental Agency, with total 60 participants.

SIA implementation action plan July 2022 - June 23 describes the recommendation (based on the previous SIA evaluation and initial SIA report in 2013), action plan, and implementation. There are external (social) and internal program category. The external(social) programs, for instance: monitoring enclave area once a month. The internal programs, such as strengthening the labor union program for employees.

Based on the evaluation remarks, it can be concluded that the programs are implemented as plan, although there are still some ongoing programs. The company also has the minutes of meeting for each program including the documentation. Based on the interview with Silip Village and Gunung Pelawan Village, the evaluation event and some SIA programs can be confirmed as mentioned in the document.

	Status: Comply	
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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 of PT GPL period of 2022 to 2024 written in *Bahasa*. The CLA has been reported to the Manpower Agency of Bangka District No. 002/SP/SB/Sosnaker/2013 on 20 January 2021.

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.
- 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 for the last 6 months.
- 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:

- SOP No IDN-HRD-SOP01-01 validated on 1 February 2021 concerning on Recruitment.
- SOP No. IDN-HRD-SOP06-01 validated on 1 February 2021 concerning on Worker's Promotion.
- SOP No. IDN-HRD-SOP05-01 validated on 1 February 2021 concerning on Worker's Appraisal.

Based on the interviews with workers (harvesters, pesticide application, 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 were permanent workers and contract 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 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 AR (initial) who sent the application letter on 5 May 2023 and started working as a worker in field on 15 June 2023 as a permanent worker in harvesting.
- Promotion documents such as management decree for worker's promotion. For example: Worker on behalf of SWD (initial) who had a promotion based on worker's appraisal, from probation to permanent worker in 2B grade on 1 January 2023.
- Termination document such as the management decree of employment's termination on behalf of ARD (initial) due to pension. UoC also showed other supporting documents such as the identity card, the agreement between the terminated worker and the UoC, calculation of termination payments, and the proof of its payment in accordance with the applicable laws.

Based on the interviews with the Manpower Agency of Bangka District, the company had been applied the existing labor procedures in accordance with the regulations. During 2022 to 2023, there were no issues related to manpower brought to the Agencies.

Status: Comply

3.6

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

3.6.1

The company has procedures related to OHS plans and mitigation at PT Gunung Pelawan Lestari, namely:

- SOP No. IDN-OSH-SOP02-04, dated March 7 2023 concerning Personal Protective Equipment.
- SOP No. IDN-OSH-SOP05-02, dated 4 September 2023 concerning Building fire control
- SOP No. IDN-OSH-SOP13-01, dated 7 September 2023 concerning Emergency Preparation and Handling
- SOP No. IDN-OSH-SOP20-00, dated 25 June 2023 concerning Control of Estate Land Fires.
- SOP No. IDN-OSH-SOP07-03, dated September 6 2023 concerning First Aid.

Companies can show documents resulting from risk identification and implementation plans for all Estate and Mill units contained in the Occupational Safety and Health Hazard Identification and Risk Assessment (IBPR) document, revised on 30 August 2023 for factory units and plantation units. The document explains: Activity Stages; Description of activities; Type of activity; Potential Hazard Identification (Potential Hazard; Type; Hazard); Current Control (Type of Control; Description of Control); Legal; Risk Assessment (Likelihood; Severity; Outcome); Control Determination (Conclusion; Program Code).

The company has also shown documents on socialization activities for Hazard Identification and Risk Control for the 2023 period to all workers at PT Gunung Pelawan Lestari. One example is the implementation of socialization on April 24 2023 at Cemara Estate and was attended by 15 workers.

Based on the results of interviews with boiler workers at Tengkalat POM and spray officers at Block L16 Division 1 Cemara Estate, it is known that workers know and understand the hazard identification documents, risks and control plans and are able to implement them in the field. The worker also added that the company routinely provides outreach regarding Hazard Identification and risk control to workers during morning assembly.

3.6.2

The company has monitored the effectiveness of its OHS plan to address OHS risks to people. Monitoring is carried out every month in conjunction with the OHS committee's regular monthly meeting activities. One example is the monthly OHS Committee meeting of PT Gunung Pelawan Lestari for the period July 2023 which was held on July 31 2023. This activity was attended by 17 participants. The meeting discussed work accident statistics and the implementation of OHS at PT Gunung Pelawan Lestari.

Apart from that, the company has also carried out periodic health checks for all workers at PT Gunung Pelawan Lestari. The periodic health checks are as follows:

- Periodic health checks for Tengkalat Estate with a total of 500 workers participating.
- Periodic health checks for Tengkalat POM with a total of 141 workers participating.
- Periodic health checks for Gunung Pelawan Estate with a total of 383 workers participating.
- Periodic health checks for Gelam Estate with a total of 426 workers participating.
- Periodic health checks for Cemara Estate with a total of 414 workers participating.

The company has also presented periodic health examination documents for employees who have not taken the health examination in June 2023. The follow-up health examination was carried out in August 2023 with a total of 52 workers participating. Based on the results of periodic health examinations for the period June and August 2023, it is known that all workers are fit to work.

Apart from that, the company has also carried out special examinations for employees with high risk potential for both Estate and Mill which will be carried out in June and August 2023. Based on this document, it is known that special health examinations have been carried out such as Cholinesterase, Spirometry and audiometry with details:

- Audiometric examination for 163 workers.
- Cholinesterase examination for 146 workers.
- Health checks for 164 workers.

Based on the special health examination results document, there are several workers with Fit With Note examination results. One of them is the results of a cholinesterase examination in the name of Su (Cemara Estate spray foreman) with Fit With Note results, with the advice of the examining doctor being to do a repeat cholinesterase examination and carry out periodic examinations once a year. The company has shown follow-up to the results of the health inspection. The results of the health examination were reviewed by the company doctor and it was recommended that he be transferred to a job that was not related to chemicals, and that a cholinesterase re-examination was carried out after 3 months in a job that was not related to chemicals. Furthermore, the company presented decision letter number 003.CME/SK/VI/2023 dated July 31 2023 which explained that the worker with the name Su (initials) was transferred to work as a composting worker starting August 1 2023. Based on a review of the foreman's work record documents for the period August 2023 it was discovered that the worker had worked as a composting foreman.

	Status: Comply	
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**3.7
All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.**

3.7.1

Unit of certification had training identification and program for 2023 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 in main estate and plasma, for example:

- Training of spraying procedure for pesticide application workers.
- Training of Integrated Pest Management for maintenance workers.
- Training of Manuring for manuring workers.
- Training of work accident simulation for all workers.

Main estate and plasma area was only separated by division in each estate. Therefore, all the operational activities in plasma was full managed and so its training.

3.7.2

UoC 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 harvesting agronomy conducted on 3 July 2023 which was attended by workers in Gelam Estate.
- Training of pesticide application agronomy conducted on 10 July 2023 which was attended by workers in Gelam Estate.
- Training of manuring agronomy conducted on 21 February 2023.
- Training of conservation area conducted on 7 March 2023 which was attended by workers in Gelam Estate.

Based on field observations and interviews with workers (harvesters, pesticide application 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

UoC showed the record of socialization related to supply chain to relevant workers which was conducted on 4-5 August 2023 attended by security, weighbridge officer, laboratory officer, clerk, and operators in Tengkalat Mill. The minutes explained the procedures for managing certified and non-certified products including the responsibilities for each of the personnel who handle products.

Based on the interviews with security, the weighbridge operator in POM and FFB administration, and workers in dispatch, it’s known that workers have already understood their duties and responsibilities in the implementing of SCCS in accordance with the procedure and the certified and uncertified products, and the FFB source.

	Status: Comply	
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3.8 Supply Chain Requirements for Mills

3.8.1-3.8.2

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

3.8.3

Certified product estimates are recorded in the final Assessment and Certificate Report, and updated in RSPO Palm Trace. Certified products are actually verified during this assessment. Estimated certified production for the next permit period has also been established, at a reasonable amount considering last year’s production. The data is displayed in the following table:

Product	Estimate Production period of 24 Feb 2023 – 23 Nov 2023	Actual Production (MT) of previous audit Sep 22 – Aug 23 (CPO and PK production has been added to opening stock in August 2022)	Estimate Production for 12 month (MT)
FFB	167,000	215,886.42	226,600
CSPO	62,400	56,047.68	51,600

CSPK	14,300	13,917.52	12,600
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*Although FFB exceeded estimates, the actual production of CSPO and CSPK had not exceeded the quota

3.8.4

The Mill has registered as RSPO member under MP Evans Group Plc (No. 1-0027-06-000-00) 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: Tengkalat POM - PT. Gunung Pelawan Lestari
- License ID: CB143909
- Member ID: RSPO_PO1000006652
- Type of Business: Oil Mill
- Supply chain model: Mass Balance

Reporting requirements within the previous 12 months have been audited by the factory through RSPO Palm Trace, such as product sales announcements and confirmation from buyers.

3.8.5

The company has a mechanism regarding traceability which is stated in the RSPO supply chain SOP with No. IDN-SUS-SOP05-01 dated 25 January 2021 which explains in general the requirements regarding the control system implemented to control Roundtable on Sustainable Palm Oil (RSPO) certified palm products throughout its supply chain, including material flows and claims related to these products. The scope of the procedure is all activities related to the supply chain, starting from receiving FFB, FFB processing, administrative records, product claims, bulking traceability, use of palm oil traces, complaint procedures and training.

The document also informs competent officials and their responsibilities, including:

- Head/Group Manager/Senior Manager: Overall responsibility for overseeing the implementation of these procedures in all areas they lead and ensuring they do not conflict with company regulations.
- Head of Administration: Reports Mass Balance stock to the Marketing Department every week and reports to the Mill Manager/GM/SM if there are deviations from this procedure.

The procedure refers to the latest SCCS standards (RSPO Supply Chain Certification Standards approved by the RSPO Board of Governors on 1 February 2020). These procedures also regulate abnormal conditions such as disruptions in the reporting system or errors in inputting recorded data.

Based on interviews with public service officers and weigh bridge officers, it is known that personnel can explain the supply chain management system. It is also known that supply chain management system training and refreshment (awareness) is carried out every year, for example on August 4-5 2023, which was attended by 9 people.

3.8.6

The company has procedures for carrying out annual internal audits described in the Sustainability Internal Audit SOP No. IDN-SUS-SOP07-01 dated 22 June 2021 which covers all sustainable palm oil audits including SCCS. The scope of this SOP is all activities related to the sustainability of internal audits starting from the effectiveness of RSPO, ISPO, SCCS and other certification systems determined by companies operating in the plantation, palm oil, bulking and related departments in these fields in Evans' work area. Indonesia Group.

The SOP states that internal audits are carried out every year, at least once a year. SCCS internal audit complies with RSPO SCCS requirements and RSPO market communications and claims documents and effectively implements and maintains standard requirements. The Sustainability Department is responsible for establishing the Audit Program annually.

The company also indicated an internal RSPO supply chain audit that had been carried out on 7 August 2022. All supply chain standards and regulations regarding market communications and claims had been assessed and there was 1 nonconformity related to the supply chain and this nonconformity had been complied with on 8 August 2023.

A management review of the implementation of the RSPO supply chain was carried out on August 9 2022. The management review included a discussion of CAR results from internal audits, corrections, corrective actions, etc.

3.8.7

The mill has verified and documented the certified and non-certified FFB volumes received. Certified and non-certified FFB are accepted within 12 months before the audit, namely September 2022 – August 2023:

Product	Estimate Production period of 24 Feb 2023 – 23 Nov 2023	Actual Production (MT) of previous audit Sep 22 – Aug 23 (CPO and PK production has been added to opening stock in August 2022)
FFB	260,000	215,886.42
CSPO	62,400	56,047.68
CSPK	14,300	13,917.52

Based on data during the certification period, there is still no excess production in CPO and PK. The company also has a mechanism for handling non-compliant palm oil products as stated in the RSPO supply chain SOP No. IDN-SUS-SOP05-01 dated January 25 2021 which explains handling complaints and product non-conformities from customers/buyers. During the audit, there were no written complaints from stakeholders regarding non-conforming products.

3.8.8

Based on document verification, information obtained during the permit period can determine whether certified products are being sold as described in the table below:

	Despatch period (MT) Sept 22 – Aug 23
CSPO sold under RSPO Scheme	37,403.69
CSPO sold under other scheme	13,101.61
CSPO sold as conventional	
CSPK sold under RSPO Scheme	12,605.21
CSPK sold under other scheme	
CSPK sold as conventional	

*Opening stock CSPO 6,869.71 MT (certified)

*Opening stock CSPK 1,828.59 MT (certified)

Product	Actual Production (MT) of previous audit Sep 22 – Aug 23
FFB	215,886.42
CSPO	49,177.97
CSPK	12,088.93

Based on the data, there are no over sales of certified products or non-certified products which are claimed to be certified products. Examples of sales documents displayed include transactions with No. TR-61348890-b8c8 which provides the following information:

- Buyer's name: PT. Wilmar Nabati Indonesia Pelintung
- Seller name: Tengkalat POM, PT. Mount Pelawan Lestari
- Loading or shipping/delivery date: 06-14-2023
- Date of issue of the document: 06-29-2023
- RSPO certificate number: Tengkalat POM PT. Gunung Pelawan Lestari (member ID : RSPO_PO1000006652) and PT. Wilmar Nabati Indonesia Pelintung (member ID : RSPO_PO1000001577)
- Product description, including the applicable supply chain model (Identity Protection or Mass Balance or approved abbreviations): Supply Chain Model, namely Mass Balance
- Quantity of product sent: 400.15 MT

- All related transport documentation: Seller Contract Number: GPL-CPO/SC/0523/0011; Seller Reference Number: GPL-CPO/DO/0623/0011A; and B/L Number: GPL-CPO/DO/0623/0011A.

3.8.9, 3.8.10, 3.8.11

The company has agreements with third parties regarding the transportation of CPO that guarantee SCCS RSPO compliance and certification bodies in verifying to contractors or outsourcing operations if an audit is deemed necessary. This is stated in the cooperation agreement letter with No. GPL/TGM/2016/01 dated 19 April 2016 which has been updated with addendum V on 21 September 2022 which explains the collaboration between PT GPL and PT Wana Ekabina Manunggal for the transportation of CPO which is valid until 15 May 2028. Meanwhile, for the transportation of PK, the PK buyers who directly transport/pick up the product to POM.

In addition, to ensure the contractor complies with the RSPO Supply Chain, in the agreement there is a clause that regulates the contractor's obligation to comply with supply chain regulations. For example, the responsibility to ensure the purity of certified products delivered during distribution, as well as the willingness to be monitored by a Certification Body to verify compliance. Based on interviews with representatives of PT Wana Ekabina Manunggal, it is known that they are willing to be observed by the Certification Body to verify compliance.

Furthermore, it was discovered that there were no new contractors compared to the previous audit. The contractor used by the company is the same as the previous assessment.

3.8.12

The company has current records and reports stored at the factory office, complete, accurate and up to date. All records are accessible to the auditor, such as certified product delivery records, sales contracts, delivery orders/invoices, production and product sales reports. Based on document verification on supply chain procedures, the retention time for all records and reports regarding the supply chain is kept for 2 years.

For example, records of all volumes of certified palm oil/palm kernel oil purchased (input) and claimed (output) during the 12 month period prior to the audit (September 2022 – August 2023):

- FFB**
September 2022 – August 2023 : 215,886.42 MT

- CSPO**

Period	CPO production (MT)		Total	Cert CPO Dispatch (MT)			Total	Stok CPO	
	Cert	Non Cert		RSPO	Other scheme	Non Cert		Certified	Non Certified
Sep 22 – Aug 23	49,177.97	23,401.40	72,579.37	37,403.69	13,101.61	22,701.72	73,207.02	5,542.38	704.86

*Opening stock CSPO (certified) 6,869.71 MT and stock CSPO (non-certified) 5.18 MT

- CSPK**

Period	CSPK production (MT)		Total	Cert PK Dispatch (MT)			Total	Stok PK	
	Cert	Non Cert		RSPO	Other scheme	Non Cert		Certified	Non Certified
Sep 22 – Aug 23	12,088.93	5,770.05	17,858.98	12,605.21	-	6,230.11	18,835.32	1,312.31	(414.08)

*Opening stock CSPK (certified) 1.828,59 MT and stock CSPK (non certified) 45,98 MT

Based on mass balance calculations, it is known that production, sales and certification production stock are:

- CSPO production was 49,177.97 MT, Sold with RSPO certificate 37,403.69 MT, Opening stock in August 2022 was 6,869.71 MT so CSPO stock was 5,542.38 MT.
- CSPK production was 12,088.93 MT, sold as RSPO product was 12,605.21 MT, Opening Stock in August 2022 was 1,828.59 MT so CSPK stock was 1,312.31 MT.

3.8.13-3.8.14

CPO (OER) and PK (KER) production conversion rates are based on actual daily, monthly and annual production. The extraction rate follows actual data for the 12 month period September 2022 to August 2023, namely OER 22.70% and KER 5.60%. Periodic extraction updates are actual extractions.

3.8.15

Tengkalat POM applied SCCS – Mass Balance (MB) since its received and processing the FFB from certified and uncertified sources, verification is done through field observation and interview to security and weigh-bridge operator as well as management representative. The mill claims only the volume of oil palm products produced from certified FFB as MB.

3.18.16

Based on mass balance calculations, it is known that production, sales and certification production stock are:

- CSPO production was 49,177.97 MT, Sold with RSPO certificate 37,403.69 MT, Opening stock in August 2022 was 6,869.71 MT so CSPO stock was 5,542.38 MT.
- CSPK production was 12,088.93 MT, sold as RSPO product was 12,605.21 MT, Opening Stock in August 2022 was 1,828.59 MT so CSPK stock was 1,312.31 MT.

Company has made shipping announcement not more than 3 months after dispatch. For example:

- Shipping announcement No. TR-71ea1c98-f34e for CSPK MB selling contract No. GPL-PK/SC/0123/0001 amount 300 MT. This contract has been shipped on 24 February 2023. Shipping announcement was created on 31 March 2023.
- Shipping announcement No. TR-efd1bddb-8b73 for CSPO MB selling contract No. GPL-CPO/SC/0223/0005 amount 2,900.1 MT. This contract has been shipped on 1 March 2023. Shipping announcement was created on 31 March 2023.

Company has removed its certified stock for other scheme and conventional scheme. For example for license periode, CSPO has been removed as amount as 3,000.23 MT with transaction number ST-TR-d6fe7b58-3530 on June 29 2023.

3.8.17

Based on announcement and transaction report documents review, it concluded that all RSPO certified products submitted are in compliance with the RSPO Rules on Market Communications and Claims.

	Status: Comply	
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PRINCIPLE #4 RESPECT COMMUNITY AND HUMAN RIGHTS AND DELIVER BENEFITS

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

4.1.1

UoC showed their commitment due to respecting human rights stated in the stated Sustainability and Business Ethics validated in October 2021. The policy explained that Evans Group committed to respect and protect human rights in order to create security for all workers including not to discriminate, give freedom in beliefs, respect and uphold human rights including the rights of human right defenders.

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, estate, and plasma. 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 (Gunung Pelawan Village and Silip Village), 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.

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. HRD-SOP15-01 dated on 03 February 2020 concerning in handling dispute. The policy explained activities of dispute identification, dispute analysis, dispute management planning, dispute handling implementation, monitoring, evaluation, and reporting.
- SOP No. GPL/SOP/Uмум-02 dated on 04 September 2013 concerning in information transparency. The policy explained the company regulated in delivering information based on the principle of free prior and informed consent, namely the freedom of speech and no pressure from any party.
- SOP No. GPL/SOP/Uмум-05 dated on 25 April 2013 concerning in handling internal and external complaints. The policy explained about the company's procedure of handling and documenting any complaints.
- Whistleblower system. It described that if there were any requested, the company guarantees the confidentiality of the reporting identity and the disclosure of disgrace or incident (whistleblower).

Based on the interviews with the surrounding communities (Gunung Pelawan Village and Silip Village), 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. GPL/SOP/Uмум-05 dated on 25 April 2013 concerning in handling internal and external complaints. The policy explained activities of handling grievances related to manpower or non-manpower (e.g: facilities, etc). 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 2 weeks.

UoC's complaint procedure also explained that all complaints will be summarized and recorded in the List of Complaints. However, illiterate people can submit their complaints to the representative from the stakeholder and also recorded in the List of Complaint.

Based on the interviews with workers and labor union, it's known that workers have a good understanding towards grievance mechanism which can be submitted to labor union.

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 interview with both internal and external stakeholders, they informed that there were no complaints or grievances against the UoC.

Based on the documents review of the worker's grievance logbook period of 2022 to 2023, it is known that there were no grievance/complaints against the company. Based on the interviews with the government agencies, surrounding communities, gender committees, labor unions and workers, it's known that there were no further complaints against the unit of certification.

4.2.4

UoC showed the SOP No. GPL/SOP/Umum-05 (Rev. 01) validated on 25 April 2013 concerning in internal and external complaints and SOP No. HRD-SOP15-01 validated 3 February 2020 concerning in handling any dispute. These policies explained the mechanism of handling any grievances and access to the Manpower Agency (tripartite) and RSPO complaint system if the grievance didn't meet any solution.

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.

Status: Comply

4.3

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

4.3.1

The company has the following community cooperation development partnerships in order to contribute to local community development:

Koperasi Perkebunan Kelapa Sawit Ikhtiar Sejahtera

Cooperation agreement dated June 16, 2008 between the Plasma Farmers' Cooperative Ikhtiar Sejahtera and PT. Gunung Pelawan Lestari No. 001/KPPIS/SPK-GPL/VI/2008 or No. GPL/Plasma/KPP-IS/001/2008 is known to the Head of Gunung Pelawan Village, Belinyu Sub-district Head, Head of the Department of Industry, Trade, Cooperatives, Micro, Small and Medium Enterprises Bangka District, Head of the District Forestry and Plantation Service of Bangka, Bangka Regent for a period of up to 15 June 2038. The land used is under a location permit determined by the regent with the distribution of plasma (40%) and core (60%) located in Gunung Pelawan Village, Belinyu Sub-District, Bangka District, Kep. Bangka Belitung Province.

Koperasi Perkebunan Kelapa Sawit Silip Lestari

Cooperation agreement dated May 4, 2010 between Silip Lestari Cooperative and PT. Gunung Pelawan Lestari No. GPL/Plasma/K-SL/002/2010 is known to the Head of Silip Village, District of Riau Silip, Head of the Department of Industry, Trade, Cooperatives, Micro, Small and Medium Enterprises Bangka District, Head of the District Forestry and Plantation Service of Bangka for a period of up to 3 May 2037. The land used is under a location permit determined by the regent with the distribution of plasma (40%) and core (60%) located in Silip Village, Riau Silip Sub-District, Bangka District, Kep. Bangka Belitung Province.

Koperasi Perkebunan Kelapa Sawit Mapur Mandiri

Cooperation agreement dated January 11, 2011 between the oil palm cooperative Mapur Mandiri and PT. Gunung Pelawan Lestari No. 001/KPKS MM/SPK-GPL/II/2011 or No. GPL/Plasma/KPKS-MM/004/2011 is known to the head of Mapur Village, Riau Silip Sub-district Head, Head of the Department of Industry, Trade, Cooperatives, Micro, Small and Medium Enterprises of Bangka District, Head of the District Forestry and Plantation Service of Bangka, Regent of Bangka for a period of up to January 10, 2041. The land used is under a location permit determined by the regent with the distribution of plasma (40%) and core (60%) located in Mapur Village, Riau Silip Sub-District, Bangka District, Province of Kep. Bangka Belitung.

Koperasi Perkebunan Kelapa Sawit Gunung Muda Sejahtera

Cooperation agreement dated April 1, 2016 between the Gunung Muda Sejahtera Plasma Farmers' Cooperative and PT. Gunung Pelawan Lestari No. 001/KPKS-GMS/SPK-GPL/IV/2016 or No. GPL/Plasma/KPKS-GMS/001/IV/2016 is known to the Head of Gunung Muda Village, the Belinyu Sub-district Head, the Head of the Department of Industry, Trade, Cooperatives, Micro, Small and Medium Enterprises of Bangka District, Head of the District Forestry and Plantation Service of Bangka District, Regent of Bangka for a period of up to March 31, 2046. The land used is under a location permit determined by the regent with the distribution of plasma (40%) and core (60%) located in Gunung Muda Village, Belinyu Sub-District, Bangka District, Kep. Bangka Belitung Province.

In addition, the company also had work agreement with local community such as independent FFB supplier, contractor for operational activity in estate and mill, also other vendor for goods procurement in order to contribute to community

development. For example:

- FFB supplier: CV Multi Nusa Pratama, CV Tandan Pratama, Suhendra, etc.
- Contractor: CV Pilar Tangguh Persada, CV Berkah Abadi Makmur, etc.
- Vendor: PT Nusantara Bangka Jaya, Dunia ATK, etc.

The company has a PT Gunung Pelawan CSR Program for the 2022-2023 period which was prepared based on the results of consultations with the surrounding community which were carried out in conjunction with the company's SIA Program consultations. For example, the company's CSR realization in 2023 is as follows:

- In the partnership sector, such as providing premiums to partnership cooperatives for the period January-June 2023.
- Social sectors such as social assistance to Sungai Liat Village in April 2023.
- Infrastructure sector such as assistance to build a mosque in Mapur Village in January 2023.

The company has also reported a CSR report which is included in the RKL-RPL report, for example for the 2023 semester 1 period which was sent to the relevant department on July 28 2023.

Based on results of interviews with Silip Village and Gunung Pelawan Village representative, it is known that communication between company and surrounding community is good. From the interview results, it was conveyed that the company had provided CSR assistance to the surrounding community in accordance with the identification needs.

Status: Comply

4.4

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

4.4.1

The company also has farmer member documents for each cooperative in the company that have been determined by the Regent of Bangka, with the following details:

- Decree of the Regent of Bangka (No. 188.45/1676/DINPERTAN/2017) concerning Amendments to Decree of the Regent of Bangka No. 188.45/875/HUTBUN/2010 concerning the Appointment of Plasma Participating Farmers to Become Members of the Mapur Mandiri Palm Oil Plantation Cooperative in Mapur Village, Riau Silip District, Bangka Regency, which informed that there were 466 plasma farmers on December 20 2017.
- Bangka Regent's Decree (No. 188.45/526/HUTBUN/2013) concerning Amendments to Bangka Regent's Decree No. 188.45/296/Hutbun/2009 concerning the Appointment of Participating Plasma Farmers to Become Members of the Ikhtiar Sejahtera Palm Oil Plantation Cooperative in Gunung Pelawan Village, Belinyu District, informs that the number of plasma farmers on 23 August 2013 was 525 people.
- Bangka Regent's Decree (No. 188.45/944/DINPERTAN/2018) concerning Amendments to Bangka Regent's Decree No. 188.45/480/HUTBUN/2010 concerning the Appointment of Plasma Farmers to Become Members of the Silip Lestari Palm Oil Plantation Cooperative in Silip Village, Silip Riau District, Bangka Regency, which informed 227 plasma farmers on June 25 2018.
- Bangka Regent's Decree (No. 188.45/361/DINHUTBUN/2016) concerning the Appointment of Plasma Participating Farmers to Become Members of the Gunung Muda Sejahtera Palm Oil Plantation Cooperative, Gunung Muda Village, Belinyu District, Bangka Regency, which informed 1169 plasma farmers on January 20 2016.

Based on document verification, it is also known that the company has HGU covering an area of 11,818.21 Ha with details of 7,131.83 Ha for self-management and 4,686.33 Ha for partnership (full management scheme) and there are no areas that are not included in the scope.

4.4.2

The company gave an example of the last land acquisition in September 2020 which followed the FPIC procedure, for example there was evidence of resolution of a land dispute covering an area of 4.8 Ha (previously owned by the initials IL) and a land dispute covering an area of 11.2 Ha (previously owned by the initials MSR). Land acquisition records are accompanied by supporting documents, such as:

- Certificate of Compensation for Cultivated Land.
- Letter of Relinquishment of Cultivation Rights on Cultivated Land.
- Location map.

- Details of the year of principal investment compensated by the company.
- Identity letter of previous land owner.
- Signature of the Head of Mapur Village as a witness.

Based on interviews with representatives of Silip Village and Gunung Pelawan Village, it was stated that the company had followed the FPIC procedures. Relevant information regarding compensation and land acquisition has been presented in appropriate form and language. The community or previous land owners have also been represented in the negotiation process for land compensation payments.

In addition, representatives from Mapur Village and Gunung Muda Village, who were also land owners, had previously understood the FPIC process, including the company's commitment to CSR, small farmer schemes, and local recruitment. The company has agreements with related small farmers, implements CSR programs, etc. This review also includes monitoring plans and management of social impact assessment documents.

4.4.3

The company has HGU Stake Maintenance procedures as stated in document No. GPL/SOP/Umum-14 dated 7 August 2012 which explains that maintenance of HGU boundary marks is carried out periodically every 6 months by monitoring and checking the physical condition of the boundary marks by officers appointed by the plantation management.

The company shows monitoring documents for HGU stakes, for example on June 5 2023 in Gelam Estate and Cemara Estate which has provided complete information regarding the stake number, stake condition, stake location, stake coordinates and repair actions as well as repair time targets if there are damaged or missing stakes. . In the monitoring report, it is known that all HGU stakes are available, with details in Gelam Estate as many as 61 stakes and Cemara Estate as many as 95 stakes.

Based on field visits to HGU stakes, for example to Cemara Estate/KKPA at stake No. GPL 25 Block K15, No. KOP 161 Block L10, No. KOP 158 Block L11 and Gelam Estate at stake No. GPL 41 and 42 Block Q21, it is known that all HGU stakes are in place and according to their coordinates and are well maintained.

In addition, in each compensation document there is a map made in a participatory manner showing the location of the area to be compensated which is signed by the land owner and known to the local government. Based on public consultations with village representatives from Silip Village and Gunung Pelawan Village, it is known that they know the legal boundaries owned by PT Tapan Nadenggan.

4.4.4, 4.4.5, 4.4.6

The company gave an example of the last land acquisition in September 2020 which followed the FPIC procedure, for example there was evidence of resolution of a land dispute covering an area of 4.8 Ha (previously owned by the initials IL) and a land dispute covering an area of 11.2 Ha (previously owned by the initials MSR). Land acquisition records are accompanied by supporting documents, such as:

- Certificate of Compensation for Cultivated Land
- Letter of Relinquishment of Cultivation Rights on Cultivated Land.
- Location map.
- Details of the year of principal investment compensated by the company.
- Identity letter of previous land owner.
- Signature of the Head of Mapur Village as a witness.

Based on interviews with representatives of Silip Village and Gunung Pelawan Village, it was stated that the company had followed the FPIC procedures. Relevant information regarding compensation and land acquisition has been presented in appropriate form and language. The community or previous land owners have also been represented in the negotiation process for land compensation payments.

In addition, representatives from Mapur Village and Gunung Muda Village, who were also land owners, had previously understood the FPIC process, including the company's commitment to CSR, small farmer schemes, and local recruitment.

<p>The company has agreements with related small farmers, implements CSR programs, etc. This review also includes monitoring plans and management of social impact assessment documents.</p>	
<p>Status: Comply</p>	
<p>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.</p>	
<p>4.5.1 The Company has identified and assessed the legal and customary rights contained in the AMDAL and SIA documents. Based on this document, there are no legal or customary rights in the surrounding villages and operational areas of PT GPL. Apart from that, based on the HGU Decree, the company also found that there were no legal rights, customary rights and usufructuary rights in the PT GPL area.</p> <p>4.5.2, 4.5.3, 4.5.4 The company carried out new plantings after 2010 in the HGU area and the area was obtained from the community around the company. Previous land acquisition documents have been verified, and in consultation with previous land owners, it is known that land acquisition has been carried out in an FPIC manner, in accordance with the SOP for Land Acquisition Procedures (No. GPL/SOP/Umum-27 Document dated March 2 2016). The procedure has been socialized to community parties in the appropriate form and language (Indonesian). The process starts with identification and mapping, followed by measurements and physical field checks, then the Operations Room Assistant (ORA) will negotiate prices witnessed by Village Officials. The FPIC process also includes environmental and social impact assessments such as providing food and water sources for village residents.</p> <p>4.5.5, 4.5.6, 4.5.7, 4.5.8 There was no new land clearing after 2018. Based on the HGU Decree, it is stated that the company's area comes from compensation from the surrounding community. In the minutes of committee B, it is known that the community understands the consequences of the HGU obtained by the plantation and is willing to hand over their land to the company.</p>	
<p>Status: Comply</p>	
<p>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.</p>	
<p>4.6.1, 4.6.2, 4.6.3, 4.6.4 There is no change from the previous assessment. The company has not carried out new planting activities.</p> <p>Previous land acquisition documents have been verified, and in consultation with previous land owners, it is known that land acquisition has been carried out in an FPIC manner, in accordance with the SOP for Land Acquisition Procedures (No. GPL/SOP/Umum-27 Document dated March 2 2016). The procedure has been socialized to community parties in the appropriate form and language (Indonesian). The process starts with identification and mapping, followed by measurements and physical field checks, then the Operations Room Assistant (ORA) will negotiate prices witnessed by Village Officials. The results of verification of compensation documents and interviews with the community show that the compensation process is carried out directly to land owners and equal opportunities are given to both men and women, and land owners are given the freedom to release their land without any coercion. The company has shown a list of compensation recipients and from this list it is known that the recipients consist of men and women.</p> <p>The company gave an example of the last land acquisition in September 2020 which followed the FPIC procedure, for example there was evidence of resolution of a land dispute covering an area of 4.8 Ha (previously owned by the initials IL) and a land dispute covering an area of 11.2 Ha (previously owned by the initials MSR) . Land acquisition records are accompanied by supporting documents, such as:</p> <ul style="list-style-type: none"> • Certificate of Compensation for Cultivated Land • Letter of Relinquishment of Cultivation Rights on Cultivated Land. • Location map. • Details of the year of principal investment compensated by the company. 	

- Identity letter of previous land owner.
- Signature of the Head of Mapur Village as a witness

Based on interviews with representatives of Silip Village and Gunung Pelawan Village, it was stated that the company had followed the FPIC procedures.

Status: Comply

4.7

Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.

4.7.1, 4.7.2, 4.7.3

The company compensates for land within the HGU, there are no new planting areas or clearing of new land outside the HGU. Previous land acquisition documents have been verified, and in consultation with previous land owners, it is known that land acquisition has been carried out in an FPIC manner, in accordance with the SOP for Land Acquisition Procedures (No. GPL/SOP/Umum-27 Document dated March 2 2016). The procedure has been socialized to community parties in the appropriate form and language (Indonesian). The process starts with identification and mapping, followed by measurements and physical field checks, then the Operations Room Assistant (ORA) will negotiate prices witnessed by Village Officials.

Based on interviews with representatives of Silip Village and Gunung Pelawan Village, it is known that the community benefits from the company in the form of CSR activities. Apart from that, according to the previous explanation, the company has also established a smallholder scheme.

Status: Comply

4.8

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

4.8.1, 4.8.2, 4.8.3, 4.8.4

Procedures for identifying legal rights, customary rights or use rights, as well as identifying communities entitled to compensation and determining how to calculate fair compensation are regulated in the Land Acquisition SOP (No. GPL/SOP/Umum-27, dated 2 March 2016). The procedure also contains an FPIC mechanism which explains that participatory map identification regarding legal community ownership takes into account gender, community leaders, local communities or transmigrants, land ownership of ethnic or communal groups, religious leaders and youth leaders. Evidence of Procedural Awareness was documented.

Other areas are basically reserve areas, which means areas that can be used as planting areas. Based on regional information, there is no indication of a land dispute. Based on the HGU Decree, it is also known that the area of the HGU was obtained from compensation with the surrounding community and there was no land conflict.

The same thing was also conveyed based on community consultations with previous land owners, representatives of Silip Village and Gunung Pelawan Village, as well as representatives of the National Land Agency, that there were no problems related to land conflicts. Apart from that, for land acquisition, the Company provided an example of the last land acquisition in September 2020 which followed the FPIC procedure, for example there was evidence of resolution of a land dispute covering an area of 4.8 Ha (previously owned by the initials IL) and a land dispute covering an area of 11.2 Ha (previously owned by the initials IL). owned by the initials MSR). Land acquisition records are accompanied by supporting documents, such as:

- Certificate of Compensation for Cultivated Land
- Letter of Relinquishment of Cultivation Rights on Cultivated Land.
- Location map.
- Details of the year of principal investment compensated by the company.
- Identity letter of previous land owner.
- Signature of the Head of Mapur Village as a witness

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**

Tengkalat POM receives FFB from Tengkalat Estate, Cemara Estate, Gunung Pelawan Estate, Gelam Estate, and also from KKPA (schemed smallholders) inside the estate area, such as: KKPA Mapur Mandiri, KKPA Silip Lestari, KKPA Ikhtiar Sejahtera, and KKPA Gunung Muda Sejahtera. The company also receives FFB from other indirect suppliers, namely: CV Multi Nusa Pratama, CV Tanda Pratama, Suhendra Gunawan, CV Cahaya Maras Abadi, and CV Anugrah Reyzatama Group.

FFB pricing refers to the Palm Oil FFB Pricing Team, Kepulauan Bangka Belitung Province. The company has FFB price document which is continuously updated every month. FFB price detail document is issued by the Plantation Office, Kepulauan Bangka Belitung Province. The payment from PT Gunung Pelawan Lestari to schemed smallholders and the indirect FFB suppliers are based on that price. The Minutes of the Results from FFB Pricing Meeting for Palm Oil Production number 525/939/BA-TBS/DPKP-III 2023 on 8 August 2023 which explains, for instance:

- Weighted average CPO price for sales timing
- Kernel selling price
- Calculation of the formula $1 \text{ FFB} = K ((\text{HCPO} \times \text{RCPO}) + (\text{HIS} \times \text{RIS}))$, and based on this formula the FFB price is obtained

The price for FFB on August 2023:

- 3 years: Rp 1.768
- 4 years: Rp 1.833
- 5 years: Rp 1.901
- 6 years: Rp 1.972
- 7 years: Rp 2.078
- 8 years: Rp 2.117
- 9 years: Rp 2.123
- 10-20 years: Rp 2.142

Based on interviews with schemed smallholders (KKPA) such as KKPA Gunung Muda Sejahtera and other indirect FFB suppliers such as CV Multi Nusa Pratama, the FFB prices is updated daily. The price information is available in email, whats app group and FFB prices signboard on mill or monthly meeting.

5.1.2, 5.1.3, 5.1.4, 5.1.5, 5.1.6,

Based on the interview with company management, there is a clear explanation of FFB pricing to schemed smallholders (KKPA) and to indirect FFB suppliers. It is conducted by meetings and also via whats app message. It can also be confirmed by the related documents on agreement between the parties as well as the transaction history. For instance, the agreement between CV Multi Nusa Pratama and PT Gunung Pelawan Lestari No 28/MNP-GPL/X/2019-Jual Beli TBS, it is stated in the agreement that the price will be informed daily before 6.30 PM, price for Saturday and Monday will be informed on Friday. The Letter of Agreement between the company with cooperative and the FFB supplier is kept by each party. It is legally binding and explaining the agreements details. The agreement between the company and CV Multi Nusa Pratama is valid for 3 years, until October 2023. Meanwhile, the agreement between the company and KKPA Gunung Muda Sejahtera (MoU no GPL/PLASMA/KPKS-GMS/001/IV/2016) valid for 30 years, until 31 March 2046.

Based on the interview with KKPA Gunung Muda Sejahtera and CV Multi Nusa Pratama, it is identified that the FFB price must be at least the same price as set by the Plantation Agency Provincial Government of Kepulauan Bangka Belitung every month. There is a sync information pertaining to mechanism of delivering the updated FFB price, which is by direct meetings, email and communication via whats app message.

There is woman's involvement in the decision-making process, for instance it can be seen in the signed agreement letter between PT Gunung Pelawan Lestari and CV Anugrah Reyzatama Group.

The company has shown the payment receipt from January to June 2023. Based on the interview result with KKPA Gunung Muda Sejahtera and CV Multi Nusa Pratama, there is no payment issue, the payment is always on time and based on the

agreement. The FFB payment for example, payment to CV Multi Nusa Pratama on 14 February 2023 IDR 1.494.660.384 for FFB purchased in 7-9 February 2023. The minutes of FFB payment describes pricing and pricing periods, FFB amount, reduction/cost, and total paid.

5.1.7

The certification unit has calibrated the weighbridges by Department of Manpower, Commerce and Industry Kepulauan Bangka Belitung Province on 21 August 2023 and valid until 14 August 2024, as details:

- Electric weighting bridge Avery weight tronix, type ZM510, serial number 204951454, max capacity 60.000 kg and min capacity 10 kg.
- Electric weighting bridge Avery weight tronix, type ZM510, serial number 204951474, max capacity 30.000 kg and min capacity 10 kg.
- The test results is legalized based on the law of Republic Indonesia No 2 in 1981 concerning Legal Metrology.

5.1.8

Tengkalat POM receives FFB from Tengkalat Estate, Cemara Estate, Gunung Pelawan Estate, Gelam Estate, and also from KKPA (schemed smallholders) inside the estate area, such as: KKPA Mapur Mandiri, KKPA Silip Lestari, KKPA Ikhtiar Sejahtera, and KKPA Gunung Muda Sejahtera. The company also receives FFB from other indirect suppliers, namely: CV Multi Nusa Pratama, CV Tanda Pratama, Suhendra Gunawan, CV Cahaya Maras Abadi, and CV Anugrah Reyzatama Group. Tengkalat POM does not receive FFB from independent smallholders.

The company conducted socialization on 13 March – 30 June 2023 to independent smallholders in Bukit Ketok Village, Belinyu Village, Romodong Village, Gunung Pelawan Village, Gunung Muda Village, Riding Panjang Village, Lumut Village, Riau Village, Mapur Village, Bukit Layang Village, Sempan Village, Pemali Village, Banyuasin Village, Sungai Liat Village, and Silip Village with total 156 participants. The content of the event, such as:

- Socialization on RSPO
- Socialization on FFB recording and plantation maintenance
- Socialization on health and safety, hazardous and toxic waste, HCV
- Socialization on wage payment
- Socialization on pesticide

5.1.9

The company has SOP of Internal and External Complaint No. GPL/SOP/Umum-05 revision 00 on 7 August 2012. It describes on how to handle complaints from internal and external stakeholders. It stated the objectives, responsibilities, procedures, documentation and exceptions. The company does not receive any complaint in 2023 from external stakeholders.

	Status: Comply	
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5.2
The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.

5.2.1, 5.2.2, 5.2.3, 5.2.4,

The company develops programs to improve the community's welfare. It can be shown by establishing the fully managed plasma plantations or KKPA (schemed smallholders) inside the estate area, such as:

- KKPA Mapur Mandiri,
- KKPA Silip Lestari,
- KKPA Ikhtiar Sejahtera, and
- KKPA Gunung Muda Sejahtera.

It has enhanced the prosperity since 2008. The company assigns managers and assistants to manage the plasma. Tengkalat POM receives FFB from the KKPA in accordance with the contract agreed by both parties. The membership is not limited to men or women.

The company conducted socialization on 13 March – 30 June 2023 to independent smallholders in Bukit Ketok Village,

Belinyu Village, Romodong Village, Gunung Pelawan Village, Gunung Muda Village, Riding Panjang Village, Lumut Village, Riau Village, Mapur Village, Bukit Layang Village, Sempan Village, Pemali Village, Banyuasin Village, Sungai Liat Village, and Silip Village with total 156 participants. Those smallholders are in the Group of Bangka Lestari Independent Smallholder (PSBL). The content of the event:

- Socialization on RSPO
- Socialization on FFB recording and plantation maintenance
- Socialization on health and safety, hazardous and toxic waste, HCV
- Socialization on wage payment
- Socialization on pesticide.

Tengkalat POM receives FFB from Tengkalat Estate, Cemara Estate, Gunung Pelawan Estate, Gelam Estate, and also from KKPA (schemed smallholders) inside the estate area, such as: KKPA Mapur Mandiri, KKPA Silip Lestari, KKPA Ikhtiar Sejahtera, and KKPA Gunung Muda Sejahtera. The company also receives FFB from other indirect suppliers, namely: CV Multi Nusa Pratama, CV Tanda Pratama, Suhendra Gunawan, CV Cahaya Maras Abadi, and CV Anugrah Reyzatama Group.

5.2.5

The company has publicly reported the progress of the support program to farmers through the MP Evans Group website, namely mpevans.co.uk (Schemed smallholder co-operatives). Data on the development of ISH Programs uploaded to the website by ISH personal in charge for PT Gunung Pelawan Lestari (community development).

The company also report the development of plantation business to Agriculture and Food Security Agency Bangka Regency Kepulauan Bangka Belitung Province for second quarter 2023 on 14 July 2023.

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 recognition of human rights stated in the Sustainability and Business Ethics Policy validated on October 2021. The group aims to provide fair and equal opportunities to all its workers. The company seeks to prevent discrimination in the workplace. In employing all employees, the company committed to the principle of equality and would not discriminate or restrict, harassment or exclusion based on human distinctions or the basis of religion, ethnicity, race, ethnicity, group, class, social status, economic status, gender, language, political beliefs.

UoC also showed the record of the company's socialization for instance the socialization which was conducted on 28 June 2023 in Gelam Estate. 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.

6.1.2

UoC showed job vacancy announcements for harvesting worker in 2023 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 Tengkalat Estate, Tengkalat Mill, Gunung Pelawan Estate, Cemara Estate and Gelam Estate, 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.

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 were 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 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 AR (initial) who sent the application letter on 5 May 2023 and started working as a worker in field on 15 June 2023 as a permanent worker in harvesting.
- Promotion documents such as management decree for worker's promotion. For example: Worker on behalf of SWD (initial) who had a promotion based on worker's appraisal, from probation to permanent worker in 2B grade on 1 January 2023.

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 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, loose fruit picker, and clerks.

Based on the interview with women workers in field, there was no pregnancy test during recruitment process. The pregnancy test only carried out to make sure that they not do any agrochemical works when pregnant or once the worker felt the indication of pregnancy.

6.1.5

Gender committees had been formed and still active until today in each unit which are chaired by the head of gender committee. The structure of the gender committee consists of female and male workers as seen in the gender committee organizational structure. 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 informed that they also socialized the protection of worker's reproductive rights and sexual harassment on 28 June 2023. 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 also the head of gender committee because it had been routinely socialized by the management, the last socialization related to the sexual harassment and domestic violence against women. The activity was carried out once a month and attended by female workers and housing residents. The results of this socialization can be seen with the absence of sexual harassment in company operational activities and the workers given equal opportunities for all genders (male or female) showed in the workers demographic data.

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).

UoC showed the Management Decree No. 016/SK.UPAH/GPL-HR/XII/2022 concerning the wage structure and scale of permanent worker (SKU-H) of PT Gunung Pelawan Lestari in 2023 validated on 20 December 2022. The document with the lowest grade of 0 to 2 years work period received the wage in accordance with the province minimum wage. Meanwhile, for the permanent worker of SKU-B, UoC also showed Management Decree No. 017/SK.UPAH/GPL-HR/XII/2022 concerning the wage of contract worker and permanent worker (SKU-B) PT Gunung Pelawan Lestari in 2023. The document stated that the workers wage with the lowest grade of P1 received the wage in accordance as Rp. 3,508,474/month.

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. For example: the male worker in manuring activity on behalf of RN (initial) received the same wage as female worker on behalf of DK (initial) at the same grade.

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 of PT GPL period of 2022 to 2024 written in *Bahasa*. The CLA has been reported to the Manpower Agency of Bangka District No. 002/SP/SB/Sosnaker/2013 on 20 January 2021. The document 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 workers in daily morning brief.

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.) as listed in the CLA and in accordance with routine socialization provided by the certification unit. Workers' wages in 2023 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

UoC has CLA period 2022 to 2024 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 IV concerning working time which explains that there are 2 types of working time in the company, namely by working 8 hours per day or 5 working days in a week and 7 hours per day or 6 working days in a week in which the total working hours are 40 hours in a week.
- Article V concerning wages which explains that the lowest wage of worker couldn't be lower than the minimum wage set by the government every year. The workers' wage was basic wage plus the rice allowance as much as 15 Kg.
- Article XXIII concerning absent days which explains that workers who were absent of work for at least 4 continuously working days will be get first warned.

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

- Decree of the Governor of Kepulauan Bangka Belitung No. Kpts 188.44/653/DISNAKER/2022 concerning the minimum wage of Kepulauan Bangka Belitung for the period of 2023 is Rp. 3,498,479.00/month.
- Management Decree No. 016/SK.UPAH/GPL-HR/XII/2022 concerning the wage structure and scale of permanent worker (SKU-H) of PT Gunung Pelawan Lestari in 2023 validated on 20 December 2022. The document with the lowest

grade of 0 to 2 years work period received the wage in accordance with the province minimum wage.

- Management Decree No. 017/SK.UPAH/GPL-HR/XII/2022 concerning the wage of contract worker and permanent worker (SKU-B) PT Gunung Pelawan Lestari in 2023 validated on 20 December 2022. The document stated that the workers wage with the lowest grade of P1 received the wage in accordance as Rp. 3,508,474/month.

UoC also showed workers' agreement of each type of works, for instance:

- Contract worker on behalf of ABD (initial) No. GPL/TGM/PKWT/05/2023/001 placed as maintenance worker in mill. The agreement valid from on 1 May 2023 until 30 April 2024.
- Permanent worker on behalf of RTW (initial) No. 004/SK-(Probation)/CEMARA ESTATE/2023 placed as loose fruit pick worker on 1 February 2023.

Unit of certification had shown their consistency in this assessment of work agreements that are owned by every worker so there was no policy to accept family members who work without a valid work association. In addition, in the field observation activities during the audit, there were no family members of workers who helped work in the field without work ties and the workers' work agreements has in accordance with their work on field.

6.2.3

UoC also showed overtime payment in April and July 2023 that has been in accordance with applicable laws for boiler operators, engine room operators, securities, sample officer, and WTP operator. In the pay slip document and their attendance list, it's known that the nominal of the worker's overtime wages has in accordance with the overtime calculation, as follows:

- Boiler Operator on behalf of RMD (initial) had basic salary of Rp. 3,499,729 and total overtime hours in July were 312.5 overtime hours so the overtime payment was Rp. 6,321,738.
- Sampling officer on behalf of YS (initial) had basic salary of Rp. 3,499,729 and total overtime hours in July were 245.5 overtime hours so the overtime payment was Rp. 4,966,356.

A review of payslip document (harvester, maintenance worker, security, and mill operators) for April 2023 and July 2023, proved that the wages received are above the minimum wage and in accordance with the wage scale structure determined by the certification unit for 2023. 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 annual leave was given 12 days a year of paid leave while the maternity leaves was given 90 days of day leave in total. For example, the maternity paid leave letter on behalf of SNM (initial), who had given 45 days before giving birth and 45 days after approved by the Supervisor in May 2023.

UoC showed the Management Decree No. 016/SK.UPAH/GPL-HR/XII/2022 concerning the wage structure and scale of permanent worker (SKU-H) of PT Gunung Pelawan Lestari in 2023. The document with the lowest grade of 0 to 2 years work period received the wage in accordance with the province minimum wage while workers with more than 2 to 7 years of work period received the minimum wage plus additional wages of Rp. 1,250/month. Based on Government Regulation Number 36 of 2021 concerning Wages article 24 paragraph 1, it's stated that the minimum wage applies to workers with less than 1 (one) year of work period at the company. Furthermore, paragraph 2 states that wages for workers with a work period of 1 (one) year or more must guided by the wage structure and scale.

Based on the description above, companies were encouraged to adjust wages for workers with a service period of 1 year or more in accordance with the applicable regulations. **(OFI)**

6.2.4

UoC has provided welfare facilities to occupants in each unit, for example: Cemara Estate has 35 housing units, drink water supply, food stall, housing garden (small piece of ground to grow vegetables), religion school, volleyball court, badminton court, daycare, and clinic. Based on the field visit in the housing area of each unit, it revealed that workers were provided with adequate housing facilities with and there was daycare for children. The house is inhabited by 1 family with 2 bedrooms and 1 bathroom.

In addition, the company also provided waste disposal sites for domestic waste management. For health services, the company provides clinic. 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. The certification unit has also conducted monitoring for the condition of the feasibility of the facilities provided every year, such as housing which repaired if there were damage (usually if there were any damage, the worker will inform it and it will be handled directly by the company).

6.2.5

Based on the interviews and the field visit in the housing area, there were located a free food stall for rent in housing area. There was also workers cooperatives who provide daily necessities and canteen. 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 without any difficulties.

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 Living Wage.

UoC has the determination of assessment prevailing wage and all kinds of benefit for Living Wage simulation of each unit in 2023 has been included in the calculation of housing facility costs, educational cost, daycare facility, health cost, electricity, and water costs. 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. 3,498,479 per month and the total wage and inkind benefits are Rp. 4,043,484 per month.

Based on interview with works and document verification, the calculation data of prevailing wages is rational in accordance with the local price (Bangka Ditsrict).

6.2.7

Based on the list of workers for the period of August 2023, it's known that there were 429 workers in Cemara Estate, 442 workers in Gelam Estate, 398 workers in Gunung Pelawan Estate, 500 workers in Tengkalat Estate, and 142 workers in Tengkalat POM. There were two types of workers namely permanent workers and contract workers. Therefore, there were only 1 contract worker in PT GPL in Tengkalat POM placed in compound (maintenance worker in mill). Meanwhile, all core job in fields (estate and mill) were done by permanent workers.

Based on the field visit in 4 estates and 1 mill and the interview with workers, it's known that all interviewed workers were permanent workers and they informed that there's no more contract workers in permanent work.

Status: Comply

6.3

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

6.3.1

UoC had a policy concerning on the freedom of association stated in Policy on Sustainability and Business Ethics in October 2021. It stated that the group respects workers' rights to freedom of association, provides opportunities for all workers to establish free, open, independent, democratic and responsible trade unions and to register these unions with the relevant legal authorities, and gives a freedom to choose the membership of labor union. The policy was published in Bahasa which

can be understood by all employees.

Based on the interviews with labor union representatives in each unit, 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 Bangka District, for instance: The Registration Number of Labor Union (SPGPLM) in PT GPL No. 002/SP/SB/Sosnaker/2013 validated on 3 July 2013.

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, as 1,827 members in all units.

Based on the interview with the Manpower Agency, it's known that there were 2 labor union of PT GPL registered in the agency (SPGPLM and SPSI). Meanwhile, based on the interview with the management representative, representative of SPGPLM, and workers in estate and mill, it's known that there's only 1 active labor union in PT GPL since there's no more members of SPSI left.

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 yet all the workers registered in labor union to ease them if once there's a manpower case.

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 2023, for instance: The meeting between the labor union in all units and management representative in PT GPL on 31 May 2023 regarding the request of drink water gallon cleaning and others inputs from workers.

Based on the interview with Manpower Agency and the document review of bipartite meetings, it's known that there was no mediation request from the company or labor union.

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 Chairman of the Labor Union is a worker at mill and estate, 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	
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6.4 Children are not employed or exploited.

6.4.1

UoC had a policy concerning on children/underage worker protection stated in Policy on Sustainability and Business Ethics in October 2021. It stated that the group committed to not employ child labor in any operational activities. Uoc also showed the procedure of recruitment (No IDN-HRD-SOP01-01) validated on 1 February 2021 which stated that they do not employ underage worker.

UoC then showed that they had socialized the policy to all parties including contractors for instance the socialization held on 22 June 2023 attended by workers and contractor workers.

6.4.2

UoC showed the recruitment document in accordance with the recruitment requirements such as application letter of workers on behalf of AY (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 22 June 2023 attended by workers and contractor workers. 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 in all units, 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 22 June 2023 attended by workers and contractor workers. 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 Policy on Sustainability and Business Ethics in October 2021. This policy stated that the group will carefully investigate every case of sexual harassment in its operational activities, the group will submit a reasonable sexual harassment case to the appropriate authority for legal action, the group will take firm action such as termination against workers who are found as the suspect.

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).

6.5.2

UoC showed the collective labor agreement period of 2022 to 2024 which stated about the UoC provide paid leave for maternity as 90 days and for woman in menstruation period as 2 days paid leave. 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 in daily morning brief.

Based on the interviews with the gender committee and daycare officer, the company had given about 30 minutes for breastfeeding woman and provided certain place for breastfeeding. There were no grievance or complaint related to sexual harassment during 2022 to 2023.

6.5.3

Based on the interviews with gender committee representatives and field observation, it is known that the UoC has provided a certain place for breastfeeding at daycare with special time to breastfeed. There was no prohibition from supervisors in the field related to this matter and specifically workers in the field who do not bring a vehicle will be delivered / picked up by the foreman at these times.

UoC also 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 using questionnaire for example: the form on behalf of RT (initial) which was conducted on 14 June 2023. This document informed the needs of

new mother, as follows: providing the place for breastfeeding, the time for breastfeeding, and medical check-up.

6.5.4

UoC showed the procedure to accommodate complaints and grievance from workers in sexual harassment and violence, as follows:

- SOP No. HRD-SOP15-01 dated on 03 February 2020 concerning in handling any dispute. The policy explained activities of dispute identification, dispute analysis, dispute management planning, dispute handling implementation, monitoring, evaluation, and reporting.
- SOP No. GPL/SOP/Uмум-02 dated on 04 September 2013 concerning in information transparency. The policy explained the company regulated in delivering information based on the principle of free prior and informed consent, namely the freedom of speech and no pressure from any party.
- SOP No. GPL/SOP/Uмум-05 dated on 25 April 2013 concerning in handling internal and external complaints. The policy explained about the company’s procedure of handling and documenting any complaints.
- Whistleblower system. It described that if there were any requested, the company guarantees the confidentiality of the reporting identity and the disclosure of disgrace or incident (whistleblower).

Those procedures 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, company website, 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. In the last year period, there was no complaint related to sexual harassment, violence at work/reproductive rights.

	Status: Comply	
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**6.6
No forms of forced or trafficked labour are used.**

6.6.1

UoC had a policy concerning on force-labor ban stated in Policy on Sustainability and Business Ethics in October 2021. 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 respecting the freedom of labor union.

UoC also showed the procedure of recruitment SOP No IDN-HRD-SOP01-01 validated on 1 February 2021 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 unions, 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 Estates and Mill, it’s known that there was migrant staffs in PT GPL at managerial. UoC also still have 1 contract worker (PKWT) as compound worker. All the rights for each employment status has been distinguished for workers with contract status (PKWT) and the permanent status. There was no discrimination between contract worker and permanent workers.

UoC also showed they had paid the contract worker compensation payment in every expired contract period.

Status: Comply

6.7

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

6.7.1

The company has an OHS organization at PT Gunung Pelawan Lestari as stated in the Decree of the Head of the Bangka Belitung Islands Province Manpower Service Number: 188.4/011/P2K3/DISNAKER/2023 concerning Ratification of the Occupational Safety and Health Advisory Committee (P2K3) at PT Gunung Pelawan Lestari May 31 2023 with the OHS Committee secretary in the name of YS (initials). The OHS Committee covers all units at PT Gunung Pelawan Lestari such as Estate, Mill and Plasma.

The company has also presented the Decree of the Minister of Manpower of the Republic of Indonesia Number 5/4952/AS.02.04/IV/2021 dated April 27 2021 concerning the Appointment of General Occupational Safety and Health Experts. The letter explains that the General OHS Expert at PT Gunung Pelawan Lestari is in the name of YS (initials). The decision letter is valid for 3 years.

The company has also held regular OHS Committee meetings periodically to discuss work accident statistics and the implementation of OHS at PT Gunung Pelawan Lestari. One example is the monthly OHS Committee meeting of PT Gunung Pelawan Lestari for the period July 2023 which was held on July 31 2023. This activity was attended by 17 participants.

6.7.2

The company has procedures related to preparedness and emergency response numbers which are contained in the document: GPL/SOP/Umum-10 dated August 7, 2012 concerning Emergency Management which briefly describes the handling of emergencies (Mill, housing, office and warehouse fires; land and forest; Explosions; Natural Disasters; Riots; Exposed to chemical hazards; Accidents of leakage and spillage of waste; and other emergencies).

The company has certified first aid officers, namely in the name of EW (initials) for the Tengkalat POM Unit with license number 560/040-P3K/DISNAKER/2023 which is valid until 15 August 2026 and in the name of YS (initials) for the Estate unit with license number 001 /P3K/Hi-Was/2021 which is valid until April 2024. Apart from that, the company also has first aid officers in the field (each field foreman) who have received internal training by the company doctor.

Based on the results of the review of first aid monitoring documents, it is known that there are 91 first aid kits scattered at several points in the mill buildings and estate offices and carried by each field foreman. Based on this document, it is known that the company has met the need for first aid kits in accordance with Minister of Manpower and Transmigration Regulation Number 15 of 2008 concerning First Aid. Based on document verification and field observations, it is known that 1 first aid box covers 1-25 workers.

The company has also recorded work accidents that occurred at PT GPL. All work accidents are recorded in the work accident recapitulation document in each estate and mill. All work accidents are discussed at the OHS Committee's regular monthly meetings and reported quarterly to the Bangka Belitung Service.

6.7.3

The company has provided personal protective equipment to all workers according to the type of work and identification of hazard and risk controls. The handover of personal protective equipment to workers is recorded in Form Number FRM-OSH-1A-01. The examples are as follows:

- Minutes of the handover of PPE in the form of half visors, aprons, rubber gloves and respirator masks on May 19 2023 to 18 workers at Cemara Estate (core and plasma)
- Minutes of the handover of PPE in the form of masks, aprons and gloves to 10 fertilizer workers at Gelam Estate (core and plasma) on June 14 2023.
- Minutes of the handover of PPE to workers at Tengkalat Mill in June 2023 in the form of helmet harnesses to 3 workers, 2 units of earplugs to 2 workers, 1 unit of leather gloves to 1 worker and 6 units of cloth gloves to 6 workers..

Apart from that, the company has also shown documents for the handover of PPE to contractor workers. One example is the handover of 2 units of helmets and 1 unit of boots to the TBS contractor transport driver on June 13 2023.

Based on the results of field visits and interviews with workers in each Estate, it is known that all workers have received PPE according to the type of work. Based on the results of interviews with spray workers in block L16 Division I Cemara Estate, it is known that workers have received PPE in the form of helmets, half visors, rubber gloves, aprons, boots and respirator masks. The worker also explained that if there is damage to the PPE, the worker will get a replacement for the damaged one by bringing the damaged PPE as evidence.

The company also has a special place for workers to self-sanitize after carrying out work involving chemicals called a rinse house. Rinse houses are available at each estate. As a result of field visits at the Gelam Estate and Cemara Estate rinse houses, it was discovered that the companies had sanitation facilities equipped with rinse rooms, showers, drainage channels, storage for control equipment and PPE.

6.7.4

Based on field observations, it was known that the facilities and infrastructure provided due to medical services for workers were in proper condition. Based on the documents review and interviews with workers (harvesters, pesticide applicators, mill operators) including KKPA workers, it's known that total workers in July 2023 was 1.769 workers in all Estates and 142 workers in Mill. and 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 CME, GME, GPE, and TGE have been completely fulfilled for the period of July 2023 paid on 10 July 2023 for 1,739 workers.
- BPJS (Social Security Insurance) payments for all estates have been completely fulfilled for the period of July 2023 paid on 15 August 2023 for 1,773 wokers.
- BPJS (Health Insurance) payments for Tengkalat POM have been completely fulfilled for the period of July 2023 paid on 10 July 2023 for 142 workers.
- BPJS (Social Security Insurance) payments for Tengkalat Estate have been completely fulfilled for the period of July 2023 paid on 15 August 2023 for 160 workers.

There was a difference between the number of workers in mill and the total paid workers in mill caused by the merger of insurance payment for workers in mill and bulking. 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

The company has recorded work accidents in the PT Gunung Pelawan Lestari Lost Time Accident (LTA) document. The company has also shown PT Gunung Pelawan Lestari's LTA documents for the period 2022 and 2023 (semester 1). The LTA records are as follows:

2022.

- Frequency Rate : 2.33
- Severity Rate : 4.25

2023

- Frequency Rate : 8.73
- Severity Rate : 3.43

	Status: Comply	
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PRINCIPLE #7 PROTECT, CONSERVE AND ENHANCE ECOSYSTEMS AND THE ENVIRONMENT

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

7.1.1
The certification unit has an SOP for controlling weeds, pests and diseases with document number AGR-SOP07-01 which

is valid starting March 3, 2020. Weed control is carried out biologically, manually and chemically. Pest and disease control is carried out in procedures, including leaf-eating beetles and grasshoppers, fruit borer caterpillars, termites, *Oryctes rhinoceros*, Rats, Pigs, Elephants, Caterpillar, root rot and scion, shoot rot, and bunch rot.

The results of interviews with representatives of the certification unit showed that the pests in TGE and GPE were rats and termites. Control of rats was carried out biologically (with owls) and chemically (with rodenticides if attack was > 5%). Meanwhile, termite control is carried out chemically using termiticides, with application every month if the attack is > 4 staples / Ha and application every 2 months if the attack is < 4 staples / Ha.

Based on the results of the pest and plant disease census for the period 2023 (until August 2023), it is known that there were no pest attacks such as leaf-eating pests or rats. Based on this document, it is known that there was a *Ganoderma* attack with 10,198 trees affected in Tengkalat Estate and 1,253 trees in Gunung Pelawan Estate. The company has carried out control by removing trees infected with *Ganoderma*.

Based on the results of field visits to blocks L16 and K20 division I of Cemara Estate, it was discovered that there were no signs of attacks by rats or caterpillars that eat oil palm leaves.

7.1.2

Results Based on document review and visits, it is known that the company uses species control agents including: *tyto alba*, *turnera subulata*, *cassia cobanensis*, and *antigonon leptopus* which species are not invasive according to the Minister of Environment and Forestry Regulation no. P.94/MENLHK/SEKJEN/KUM.1/12/2016.

7.1.3

Based on the results of field visits to each Estate, it was discovered that there were no signs of the use of fire in controlling pests and diseases. Based on interviews with company management, it is known that in controlling pests and diseases, the company carries out chemical and mechanical control (for the removal of trees attacked by *Ganoderma*). This is in line with the results of interviews with representatives of the Bangka Regency Food and Agriculture Service who explained that so far there has been no pest and disease control using fire at PT Gunung Pelawan Lestari.

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

7.2.1

The company has shown a document listing the pesticides used by PT Gunung Pelawan Selawan during the 2022-2023 period. The document explains the trademark, active ingredient, LD50, registration number, distribution permit period and target of the pesticide. Based on this document, it is known that there are 13 pesticide trademarks used and there are no restricted pesticides. All pesticides have registration numbers and distribution permits that are still valid. An example is Prima Up 480 SL with the active ingredient Isopropyl amino glyphosate with an registration number RI. 01030120031779 and the distribution permit period is valid until 27 June 2027, LD50 is more than 2000 mg/Kg, and targets narrow-leaved weeds.

The company also has a policy to reduce the use of pesticides which is contained in the document "Sustainability Policy and Ethical Behavior". In the Occupational Safety and Health section it is explained that the Group intends to eliminate the use of pesticides that are categorized by the World Health Organization as class 1A or 1B, or those registered by the Stockholm or Rotterdam conventions and will not use paraquat. Based on document review and field observation, several IPM program with biological approach that has been implemented such as nettle eater caterpillar by planting beneficial plant such as *Turnera subulata* and *Antigonon leptosus*. Moreover, the company has also conducted early detection routinely listed in the monthly report of early warning system.

Based on the results of interviews with company management, it is known that pesticide use is based on census results and actual conditions in the field.

7.2.2 and 7.2.3

The company has shown a document listing the pesticides used by PT Gunung Pelawan Lestari during the 2022-2023 period.

The document explains the trademark, active ingredient, LD50, registration number, distribution permit period and target of the pesticide. Based on this document, it is known that there are 13 pesticide trademarks used and there are no restricted pesticides. All pesticides have registration numbers and distribution permits that are still valid. An example is Prima Up 480 SL with the active ingredient Isopropyl amino glyphosate with an registration number RI. 01030120031779 and the distribution permit period is valid until 27 June 2027, LD50 is more than 2000 mg/Kg, and targets narrow-leaved weeds.

The company has shown documents on pesticide use at PT Gunung Pelawan Lestari during the period 2021 – 2023. The document explains pesticide trademarks, active ingredients, total use, total area of use, toxicity and the ratio of pesticide use per unit area. The documents are as follows:

Name of Pesticide	Use of pesticides		
	2021	2022	2023
	Rasio (Kg,L/ha)	Rasio (Kg,L/ha)	Rasio (Kg,L/ha)
GARLON 670 EC	0.020	-	-
PENALTY 50 SC	0.090	0.080	-
STARANE 290 EC	0.094	0.017	-
PENTA UP-Z 480 SL	0.390	0.383	-
META PRIMA 20 WG	0.116	0.117	0.118
PRIMA UP 480 SL	0.375	0.373	0.369
PRIMA FURON 20 WG	0.120	-	-
Omni Care 288 EC	0.094	0.093	0.092
Prima Pro 55 SC	0.090	0.087	0.081
DIPEL SC	0.150	-	-
CBA Fip 50 SC	0.090	0.088	0.088
Starlon 665 EC	0.020	0.020	0.019
Triester 480 EC	-	-	0.017

Based on the data above, it is known that the use of pesticides at PT Gunung Pelawan Lestari during the period 2021 - 2023 is tending to decrease. Apart from that, it is also known that the company has carried out biological pest control by planting beneficial plants and using owls (*Tyto alba*) as natural predators of rat.

7.2.4

There is no prophylactic way of using pesticides carried out by the company. The company controls using pesticides if the pest attack census shows results above the threshold. Whereas for weed control If the conditions of the circle and harvest pathway are still quite standard, weed control will be postponed. Based on observations of spraying activities, the application method is not a preventive application but is more selective for locations that have weeds.

7.2.5

The company has shown a document listing the pesticides used by the company during the 2023 period. Based on this document, it is known that there are 13 trademarks of pesticides used and there are no WHO class IA and IB pesticides and pesticides containing the active ingredient paraquat. This is in accordance with the results of field visits carried out to the chemical warehouses of each Estate where no WHO class IA or IB pesticides or pesticides containing the active ingredient paraquat were found.

Based on the results of field visits to chemical storage warehouses in each estate, for example in Tengkalat Estate, it was discovered that there were no pesticides containing the active ingredient paraquat or WHO class IA and IB pesticides.

7.2.6

The company has provided routine training regarding pesticide handling to pesticide applicators at PT Gunung Pelawan Lestari. The examples are as follows:

- Pesticide operator training on July 24 2023 at Cemara Estate which was attended by 30 participants.
- Pesticide operator training on July 25 2023 at Gelam Estate which was attended by 20 participants.

Based on the results of interviews with spray workers in block L16 Division I Cemara Estate, it is known that workers have

received PPE that complies with the MSDS of pesticides used in the form of helmets, half visors, rubber gloves, aprons, boots and respirator masks. The worker also explained that if there is damage to the PPE, the worker will get a replacement for the damaged one by bringing the damaged PPE as evidence.

7.2.7

Based on the results of field visits at the chemical storage warehouse of each Estate, it is known that the storage area has been equipped with adequate lighting, ventilation, OHS hazard symbols as well as emergency response facilities and infrastructure. In addition, no expired pesticides were found. Therefore, it is known that the storage of all pesticides is in accordance with recognized best practices, which refers to PP. 74 of 2001 concerning Management of Hazardous and Toxic Materials.

7.2.8

The company has SOP for waste identification generating from operational activities in the document GPL/SOP/K3-11 revision 01, effective on 27 April 2015. The SOP describes:

- the pesticide storage mechanism according to the recommendations provided in the MSDS,
- placement of chemicals materials that have dissimilar characteristics must be separated according to MSDS recommendations,
- preparation and release of chemicals is conducted with first in first out method,
- chemical containers must have labels,
- chemicals are only issued on request approved by the authorities and
- incoming chemical materials and release materials must be documented.

Based on field observations in agrochemical warehouses and hazardous waste storage areas in Cemara estate, Gunung Pelawan Estate, Gelam Estate, and Tengkalat Estate, it is known that pesticide storage areas are well managed, oil traps are available, adequate air ducts and are isolated. Used pesticide packages classified as Hazardous Waste were also found stored in the temporary Hazardous Waste storage.

Based on observation to the employee's housing in Cemara estate, Gunung Pelawan Estate, Gelam Estate, and Tengkalat Estate there is no pesticide packaging waste usage by the residents.

Based on interviews with pesticide application officers at Cemara estate, Gunung Pelawan Estate Gelam Estate, and Tengkalat Estate, it was stated that all used pesticide packaging or containers were sent to the Temporary Hazardous Waste Storage and not used for any other purpose. All used packaging containers, work tools and work clothes are stored in a certain storage area, so that no contaminated items are taken home.

Based on the explanation, it can be concluded that the company has a well managed pesticides packaging management.

7.2.9

Based on the results of interviews with company management and interviews with representatives of the Bangka Regency Food and Agriculture Service, it is known that there was no aerial pesticide spraying.

7.2.10

The company has also carried out special examinations for employees with high risk potential for both Estate and Mill which will be carried out in June and August 2023. Based on this document, it is known that special health examinations have been carried out such as Cholinesterase, Spirometry and audiometry with details:

- Audiometric examination for 163 workers
- Cholinesterase examination for 146 workers
- Health checks for 164 workers.

Based on the special health examination results document, there are several workers with Fit With Note examination results. One of them is the results of a cholinesterase examination in the name of Su (Cemara Estate spray foreman) with Fit With Note results, with the advice of the examining doctor being to do a repeat cholinesterase examination and carry out periodic examinations once a year. The company has shown follow-up to the results of the health inspection. The results of the health examination were reviewed by the company doctor and it was recommended that he be transferred to a job that was not

related to chemicals, and that a cholinesterase re-examination was carried out after 3 months in a job that was not related to chemicals. Furthermore, the company presented decision letter number 003.CME/SK/VII/2023 dated July 31 2023 which explained that the worker with the name Su (initials) was transferred to work as a composting worker starting August 1 2023. Based on a review of the foreman's work record documents for the period August 2023 it was discovered that the worker had worked as a composting foreman.

7.2.11

Based on the results of interviews with spray workers in block L16 Division I Cemara Estate, it is known that pregnant or breastfeeding women are not permitted to work in jobs that come into contact with chemicals. If the worker is pregnant or breastfeeding, the worker will be transferred to work that does not come into contact with pesticides.

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

7.3.1

The company has identification of waste sources in 2023 with category: POME, solid waste, domestic waste, and hazardous and toxic waste. The waste is managed in accordance with waste management procedure and government regulation.

POME

POME is processed in the WWTP pond system. POME is treated in the WWTP pond until it reaches the permissible quality standards for POME utilization in land application with the requirements of pH 6-9 and BOD ≤ 5000 mg/l. Tengkalat POM has a permit for POME management or land application based on the technical approval number 660/33/DLH/2021 issued by Environmental Agency Bangka Regency on 12 March 2021 and valid for 5 years.

Solid Waste

The solid waste produced by the company is shell, fiber and EFB. The company utilizes fiber and shells as boiler fuel, while EFB is applied to plantation land as fertilizer for oil palm plants. Further explanation on indicator 7.9.1.

Domestic Waste

Domestic waste generated from housing and offices will be disposed of in landfills.

Hazardous and Toxic Waste

The company has a SOP for the management of hazardous and toxic waste with document number GPL/SOP/K3-11 revision 01, effective on 27 April, 2015. It describes procedure for managing hazardous and toxic waste. The hazardous and toxic materials referred to include: waste from the use of chemicals and toxic, used light bulbs, waste from the use of oil, waste from using batteries, waste from using used filters, used rags, waste from chemical packaging, and all chemicals contained in plantation and mill activities.

The company collaborates with the licensed transporter to carry the hazardous and toxic waste with MoU number 001/GPL-VCA/IX/2016 and it has no limit for end timing collaboration or automatically extended every year. The company has manifest for hazardous and toxic waste transporting report with vehicle No. BN 8024 QU on 26 June 2023. The manifest for instance from Gelam Estate such as:

- Used oil 0.736 ton with manifest KLHK-1693419053.
- Used rags 0.2271 ton with manifest KLHK-1693419522.
- Used hazardous container 0.6707 ton with manifest KLHK-1693416025.
- Medical waste 0.0092 ton with Manifest KLHK-1693415246.

Based on the field observation to temporary hazardous waste storage in Tengkalat POM, Tengkalat Estate, Gunung Pelawan Estate, Cemara Estate, and Gelam Estate, the waste record is based on the actual waste in the storage. All obligations listed in the waste storage permit have been fulfilled, such as the availability of fire extinguishers, showers, eyewash, coordinates, alarms, first aid kits, oil traps and appropriate labeling. In addition to good lighting and air ventilation, the company also has drainage channels outside of the storage to anticipate pollution to the surrounding environment. Based on the interviews with

the storage officers, they fully understand the SOP for hazardous waste management and mitigation actions for potential pollution.

7.3.2

The company has SOP documents related to waste disposal management such as:

- SOP TGE Composting Process no SOP/6.1/21 on 11 April 2017.
- SOP Final Effluent no SOP/6-1/11 on 1 January 2017.
- SOP air pollution management no GPL/SOP/Umum-35 on 2 March 2016.

The company has identified waste and pollution source and have some action plan to reduce emission and pollution, for instance:

- Empty fruit bunch is applied to estate area to substitute chemical fertilizer. Based on the observation and interview with relevant officers, for example to Gelam Estate block N 31 division 2, EFB application is well managed.
- Shell and fiber are reused for engine fuel of boiler. It reduces the carbon emission from the combustion of fossil fuel.
- POME used for fertilizer, based on the observation to LA and monitoring well in block G40 Tengkalat Estate, the flatbed condition has been maintained properly and no potential of environmental pollution.

Based on the interviews with representatives of workers and managers, it can be confirmed that they understand the waste management plan in the company.

Regarding to OFI in previous audit, based on the results of field visits and interviews at the Cemara estate and Gunung Pelawan estate fertilizer sack warehouses, it was found that there was a number of used fertilizer sacks that had not been washed. According to the explanation from the head of the warehouse, this was due to time constraints for fertilizer sack washing officers which were usually carried out by the foreman. Companies are encouraged to ensure the implementation of waste management of used fertilizer sacks as described in the company's work instructions. Auditor verification during ASA 1.1, it has no longer be a concern. Based on the interview and observation to Tengkalat Estate, Gelam Estate, Gunung Pelawan Estate, and Cemara Estate, the fertilizer sack has been washed as described in the work instruction.

Based on the explanation, it can be concluded that the company has management plan for waste management and it has implemented in accordance with SOP and relevant regulation.

7.3.3

The company does not burn their waste for waste disposal. It can be confirmed by the observation to housing and landfill in Tengkalat POM, Tengkalat Estate, Gelam Estate, and Cemara Estate. Based on the interview with employee and housing residents, it was stated that they dispose their waste into these categories: organic, non-organic, and hazardous & toxic waste. Each type of waste is treated differently as regulated in the company SOP. Domestic waste is transported every twice a week and dumped into landfill area, then buried when the landfill is full. During the observations to the employee housing area in Tengkalat POM, Tengkalat Estate, Gelam Estate, and Cemara Estate, there is no traces of burning activities. In addition, there are warnings to prohibit waste burning activities as well as the dangers that could arise from burning activities.

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

7.4.1 and 7.4.2

The Company has a Fertilization SOP with document number AGR-SOP09-01 dated March 03, 2020. This SOP explains that fertilization recommendations are determined with considerations including nutrient status in leaves, soil ability to provide nutrients, plant conditions, and climate.

The company has shown documents on the results of leaf sample analysis and soil sample analysis as the basis for preparing PT GPL fertilizer recommendations as a form of implementation of its procedures, examples of which are as follows:

- Soil Analysis Number 110/LHP/Lab DITSL/VI/2022 dated 13 April 2020 published by the Laboratory of the Department

of Soil Science and Land Resources, Bogor Agricultural University for a total of 92 samples. The parameters analyzed include soil texture, acidity degree (pH), C-org, N-total, P, Ca, Mg, K, Na, Fe, Cu, Zn, Al and H.

- Analysis of Cemara Estate Leaves Number 175/RD/EXT/L/SEP/22 dated 5 September 2022 published by the Research and Development Center PT Nusa Pusaka Kencana Analytical & QC Laboratory for a total of 39 samples. The parameters analyzed include macro elements: N, P, K, Ca and Mg and micro elements: B, Cu and Zn.
- Gelam Estate Leaf Analysis Number 172/RD/EXT/L/SEP/22 dated 3 September 2022 published by the Research and Development Center PT Nusa Pusaka Kencana Analytical & QC Laboratory for a total of 36 samples. The parameters analyzed include macro elements: N, P, K, Ca and Mg and micro elements: B, Cu and Zn.

7.4.3

The company has utilized palm oil processing waste as a form of nutrient recycling strategy. The waste from palm oil processing used by the company is compost from empty fruit bunches and POME. The utilization of processing waste (2023 period) is:

Compost: 23,791,182 Kg

POME: 138,259.78 M3

7.4.4

The company has shown documents on the realization of fertilization for the period 2023. Examples are:

- Realization of urea fertilization of 785.75 tons at Cemara Estate.
- Realization of MOP fertilizer was 887.50 tons at Gelam Estate.

Based on this document, it is known that fertilization activities at PT Gunung Pelawan Lestari are in accordance with its program.

Based on the results of field visits at Block K20 Division 1 Cemara Estate, it is known that the planting area and plants are well maintained and maintained and there are no signs of nutrient deficiencies.

	Status: Comply	
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7.5 Practices minimise and control erosion and degradation of soils.

7.5.1 7.5.2 7.5.3

Land suitability maps for oil palm cultivation are included in the semi-detailed 2009 soil survey report conducted by PT Earth Line. Maps are available at a scale of 1: 80,000 for soil and slope types. PT GPL is located in Bangka Regency at an altitude of 0-50 meters above sea level. The terrain of the estate is generally flat to undulating (97.48%), rolling to hilly (2.47%) and steep (0.05%).

The soil are dominantly mineral material as result of the from mainly depending on the degree of illuviation and eluviation process (Spodosol, Entisol, Ultisols and Inceptisol). Sandy soil is a type of soil which have sandy in all layers and found in lowland along coastline which influences by marine and beaches. It has more than 90% resistant minerals and relatively low water-holding capacity, very low nutrient and low mineral capacity. Some places founded hardpan area on depth of 50-60 cm. These condition become limiting factor or unsuitable for plant growing.

Peat soil are found in the lowland (depression) of the eastern part of estates with a depth of 1-1.5 m with an area of 398.45 ha; 1.5-2.0 m covering 224.18 ha; 2.0-3.0 m covers an area of 148.24 ha.

Based on document verification sighted that the oldest oil palm planted year is year of 2006. Therefore interview result sighted that the replanting activity will be conducted on 2031. Based on field observation at Tengkalat Estate, Gelam Estate, Gunung Pelawan Estate and Cemara Estate it was known that there is no planting on steep terrain during period 2006 to 2017, as well as interview with stakeholders sighted that there are no new development or replanting during period of 2006 to 2017.

	Status: Comply	
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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

Land suitability maps for oil palm cultivation are included in the semi-detailed 2009 soil survey report conducted by PT Earth Line. Maps are available at a scale of 1: 80,000 for soil and slope types. PT GPL is located in Bangka Regency at an altitude of 0-50 meters above sea level. The terrain of the estate is generally flat to undulating (97.48%), rolling to hilly (2.47%) and steep (0.05%).

The soil are dominantly mineral material as result of the from mainly depending on the degree of illuviation and eluviation process (Spodosol, Entisol, Ultisols and Inceptisol). Sandy soil is a type of soil which have sandy in all layers and found in lowland along coastlike which influences by marine and beaches. It has more than 90% resistant minerals and relatively low water-holding capacity, very low nutrient and low mineral capacity. Some places founded hardpan area on depth of 50-60 cm, especially KKPA Tengkalat Area. These condition become limiting factor or unsuitable for plant growing. The efforts made by unit management in managing marginal land in this area include the use of empty bunch to increase water retention.

Peat soil are found in the lowland (depression) of the eastern part of estates with a depth of 1-1.5 m with an area of 398.45 ha; 1.5-2.0 m covering 224.18 ha; 2.0-3.0 m covers an area of 148.24 ha.

7.6.3

The company already has a semi-detailed land survey report from PT Gunung Pelawan Lestari. This document explains soil types, topography, dryness, and limiting factors for each type of soil. Based on the explanation from the company management, it is known that the results of the semi-detailed land survey have become the company's reference in planning activities for blocks, roads and so on.

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

Land suitability maps for oil palm cultivation are included in the semi-detailed 2009 soil survey report conducted by PT Earth Line. Maps are available at a scale of 1: 80,000 for soil and slope types. Both maps inform that there is peat soil with a depth of 1-1.5 m with an area of 398.45 ha; 1.5-2.0 m covering 224.18 ha; 2.0-3.0 m covers an area of 148.24 ha.

Based on the results of interviews and a review of the area statement documents, it is known that the company did not carry out new plantings on peatlands after November 15, 2018.

7.7.2

Based on the Peat inventory guide, it is explained that reporting is done at least twice, namely:

- First reporting within 12 months after implementation of the 2018 RSPO P&C (no later than 15 November 2019), or before the first 2018 RSPO P&C certification audit, whichever comes first
- Second reporting within 12 months prior to the 2018 P&C revision (November 2022 - November 2023)

Based on the peat inventory document, it is known that the peat area at PT Gunung Pelawan Lestari is 889.54 ha with details, the planted area is 779.63 ha, other areas are 39.42 ha and the conservation area is 70.49 ha.

The company has carried out a peat inventory according to the RSPO peat inventory template and the report has been sent to the RSPO secretariat as evidenced by the latest email sent by Arvind Devadasan to ghg@rspo.org on January 27 2021. Furthermore, the company has the opportunity to report the Peat Inventory back to the secretariat RSPO before 5 November 2023 for the second period. **(OFI)**

7.7.3

The company has a mechanism for regulating the subsidence of high peat soil layers, contained in the SOP document for Peatland Management Number AGR-SOP16-01 effective October 1 2019. In brief, this document explains the subsidence of peat soil and water management.

The company has shown documents monitoring the rate of subsidence of peat soil at PT Gunung Pelawan Lestari for the period 2022. Measurement of the rate of subsidence of peat soil is carried out in December of each current year. Based on the documents, it is known that the rate of peat subsidence during 2022 will be 1 cm from the previous year's measurement.

7.7.4

Based on the results of the 2009 land suitability survey conducted by PT Earth Line, it is known that there is a peat area of 770.87 Ha with the entire area included in the cultivation function.

The company shows records of peatland management including:

- Subsidence monitoring on 27 December 2022, it was discovered that the decrease in the peat soil layer in the period January – December 2022 averaged a decrease in peat subsidence of 1 cm.
- Water level monitoring for the first semester of 2023, it is known that the water level during that period was 10 – 60 cm.
- Piezometer monitoring for the first semester of 2023, it is known that the peat groundwater level during this period is between 15 – 60 cm.

Based on the results of interviews with company management, it is known that the PT GPL area does not have a water source to put into the peat area. Water availability on land only depends on rainwater.

Based on the results of a field visit to the Tengkalat Estate peat area, it is known that the company has selectively sprayed the peat area and maintained the growth of *Nephrolepis bisserata* as a land cover plant to inhibit the rate of evaporation in the peat area.

7.7.5

The company has no plans to replant oil palm within the next five years. The plan to replant oil palm on peatlands will be carried out from 2032 to 2035.

Based on a study of PT Gunung Pelawan Lestari's area statement documents, it is known that peat planting was carried out in 2006 and 2007. Currently the company is in the stage of determining a consultant who will carry out a Drainability Assessment study at PT GPL. The company has presented an offer proposal from PT Bhumi Pasa Hijau to conduct a DA study at PT Gunung Pelawan Lestari.

7.7.6

The company has carried out management of the PT Gunung Pelawan Estate peatlands by creating a water management program in 2023. Based on this document, it is known that the company carries out management of the peatlands by monitoring the rate of subsidence of the peat land, piezometer monitoring, selective spraying, and so on.

Subsidence Pole

Based on the results of field visits to subsidence stake number 03 in block E52 and subsidence stake number 04 in block E54 (Mapur Mandiri Cooperative), it is known that the subsidence stake has been equipped with a protective fence with a size of \pm 50 cm x 50 cm and a height of 50 cm. From the results of the field visit, it was discovered that the subsidence stakes had the potential to experience disruption (for example during harvesting activities).

Referring to the RSPO Manual On Best Management Practices (BMPs) For Existing Oil Palm Cultivation On Peat in the Measurement of Peat Subsidence section, it is explained that "An area of 2 m x 2 m around the subsidence stake must be securely fenced to prevent interference which will result in incorrect readings. accurate". Based on the explanation above, companies have the opportunity to evaluate prevention of disturbances in subsidence stakes which will result in inaccurate readings in accordance with the RSPO Manual On Best Management Practices (BMPs) For Existing Oil Palm Cultivation On Peat.

Water Management

Based on the results of a study of PT Gunung Pelawan Lestari's rainfall documents for the 2023 period, it is known that during the last 6 months (March – August 2023) rainfall in the PT GPL area was very small with a total of 63 rainy days and the average rainfall was 12 mm/rainy day. Based on the results of the field visit, it was discovered that the water conditions in blocks E52 and E54 had apparently dried up. Based on this, the company has the opportunity to ensure that the water

conditions in the PT GPL peat area comply with best cultivation practices and applicable laws and regulations.
(OFI)

7.7.7

Based on the results of a review of PT Gunung Pelawan Lestari's peat inventory documents which have been submitted to the RSPO secretariat, it is known that there is a conservation area on peat land covering an area of 70.49 ha. Based on the results of interviews with the company, it is known that there are no oil palm planting activities or other infrastructure development in this area.

In accordance with the peat inventory, it is known that the area of the conservation area is only 70.49 ha and the other non-planted area is 39.42 ha, so the area of the non-planted area and the area being conserved is 109.91 ha. And the peat areas listed in the metric template are non-planted areas and conserved areas.

Status: Comply

7.8

Practices maintain the quality and availability of surface and ground water

7.8.1

The company has the water management plan and implementation, for instance:

- Identify the water resource's location.
- Marking the river border areas by putting red paint marks on oil palm trees, as the boundary sign for no chemical application in the area.
- Planting vetiver grass and legumes.
- Not disposing liquid waste into the river but utilize it for land application (after the treatment in WWTP) based on the permit legalized by the Environmental Agency Bangka Regency.
- Utilizing water for mill processing in accordance with the standards set by the company and permit from relevant agency in Bangka Regency.
- Conduct testing of river water quality and wells monitoring.

In addition, the company has a riparian management plan including in the HCV management plan, such as:

- Socialization of HCV and the environment to the community in November 2022.
- HCV (riparian) patrols once a month.
- Reforestation in HCV 1, 3, and 4 in October 2022 and May 2023.
- Maintenance for HCV sign board in HCV 1, 3, 4, 6 in August 2022, December 2022, and April 2023.
- Socialization of HCV and the environment to the employees in December 2022, and April 2023.
- Monitoring for no chemical application in river border once a month.

The river water quality monitoring program has been stated in RKL-RPL first semester 2023 PT Gunung Pelawan Lestari. The river water quality tests conducted by PT Itec Solution Indonesia Laboratory KAN accredited lab (LP-894-IDN) based on the Ministry of Environment Regulation no 22 2021 attachment VI on 24 March 2023. The sample locations are the downstream, central, and upstream of Tengkalat River. Based on the testing result, all parameters are complied with the standard.

Drinking water which generated from the reverse osmosis process is distributed to the employees. They pay IDR 500 for each gallon. They also have access to clean water for daily need. Based on the document review, interviews, and observation, Tengkalat POM employees get the water from the reservoir, while other employees in Tengkalat Estate, Gelam Estate, Gunung Pelawan Estate, Cemara Estate, and all scheme smallholders obtain the water from drill well.

The company also conducted the water quality testing for drinking water collaborated with Health Agency Bangka Regency UPTD Health Laboratory based on the Ministry of Health Regulation No 2 2023 every once a month. Based on the testing result, all parameters are complied with the standard, for instance, TDS was 3.28 with standard <300, aluminum was 0,003 with standard 0,2, pH was 6.18 with standard 6.5-8.5.

Based on the explanation, it can be concluded that the company doesn't pollute the water sources and the employees have

access to clean water.

7.8.2

The company has the map for rivers and HCV area including the river border, with a scale of 1:100,000. The river near to the company's area is Tengkalat River. Based on the interview with employees and field observation in Tengkalat Estate block E46, Gelam Estate block F38, and Cemara Estate block J13, it can be seen that the company has a well-managed river border area. There were red painted trees approximately 10 meters from the river border, as the sign for no chemical application in the area. The company also conducted river water quality testing every semester with accredited lab KAN (LP-894-IDN). Based on the testing result, all parameters are complied with the standard.

7.8.3

PT Gunung Pelawan Lestari has permit to utilize POME for land application based on the Decree of the Head of DINPMP2KUKM Bangka Regency number 188.4/01/IPAL/DINPMP2KUKM/IV/2019 on 1 April 2019 and valid for 5 years. The company conducted routine monitoring for POME based on the applicable regulation. The area for land application based on the permit is 200,12 ha.

Based on the observation in WWTP Tengkalat POM, it is confirmed that there is no pollution to the environment such as leaks or flooding. Based on the interview with WWTP officer, it is stated that every waste water flows into LA is always recorded. The flowmeter used is functioning properly.

The POME quality testing document review based on the monitoring result from January 2023 to June 2023, as stated in the table:

Parameter	Result 2023						Unit	Metode
	Jan	Feb	March	Apr	May	Jun		
BOD 5 days	960	1,600	2,560	3,465	500	1063	-	4500 - H ⁺ - B
COD by	2408	4,000	6,400	8,661	1,250	2656	mg/L	5210 B
pH	7.5	8.2	7.72	8.2	7.8	6.4	mg/L	5220 B
Oil & Grease	<2	<2	<2	2	2	8	mg/L	2540 B
Lead (Pb)	0.02	0.02	<0,02	0.02	0.02	0.02	mg/L	3120 B, 3030
Copper (Cu)	0.08	0.32	<0,01	1.87	0.1	0.68	mg/L	3121 B, 3030
Cadium (Cd)	0.001	0.001	<0,001	0.007	0.001	0.001	mg/L	3122 B, 3030
Zinc (Zn)	0.09	0.43	<0,01	2.4	0.2	0.8	mg/L	3123 B, 3030
TS	8139	5,774	13,707	22,693	6,994	12640	mg/L	5520 B
Nitrogen	216	124	269	204	83.8	25.6	mg/L	4500-N-B
Phospate as	31	15.7	59.6	163	39.3	26	mg/L	4500-P-C
Potassium	1418	754	2,300	3,293	780	1598	mg/L	3120 B, 3030

The testing was conducted by KAN accredited laboratory KAN (LP-024-IDN) based on the Ministry of Environment Regulation number 29 2003 with BOD < 5.000 mg/L and pH 6-9. Therefore, all POME testing parameters are compliant to the standards quality. The monitoring result also has been reported to the Environment Agency Bangka Regency every 3 months.

Based on the observation to Tengkalat Estate block G40, the company has implemented a proper managed land application and the location is based on the permit. In addition, the company also has a monitoring well in block G40Tengkalat Estate and it is in good condition.

Based on the explanation, it can be concluded that the company has a well-managed POME utilization to land application in accordance with regulation and SOP.

7.8.4

The company has permit for water utilization based on the Decree of Ministry of Public Works and Housing number 837/KPTS/M/2023 on 28 July 2023 and valid for 5 years. The water utilization has been monitored and recorded in document of Recapitulation of Water Usage in Tengkalat POM. The document informed the FFB process, water usage, budget (m³/ton FFB), and ratio (m³/ ton FFB). For instance, in June 2023 FFB processed was 24,764,72 with water usage 29,548 and the

budget for 1.13 m³/ton FFB and the ratio was 1.19 m³/ton FFB. Based on the data shown, it can be concluded that the water utilized by the company always based on the budget and permit.

Based on the observation to the Water Treatment Plan (WTP), the flowmeter is still functioning well and the officer responsible for the WTP understands on the WTP process and records flowmeter data. Officers can also show the input data for inlet and outlet, which is recorded every day.

The company has documents on water tax payment from January to June 2023. The payment is issued regularly once a month. For instance, the payment receipt IDR 4.685.038 to the Bangka Regency UPT Finance Division bank account based on the invoice on 10 July 2023 no 973/1.286/UPT.BNK/BAKUDA.

Status: Comply

7.9

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

7.9.1

The company utilizes solid waste to increase the efficiency of fossil fuels and to optimize renewable energy. It can be confirmed by these records:

Periode	TBS Processed (ton)	Fiber Used (ton)	Shell Used (ton)	Kwh Turbine
June 2022	27,572	3,171	848.88	399,336
July 2022	26,378	3,033	901.69	371,136
August 2022	28,678	3,298	984.01	393,952
Sep 2022	32,152	3,697	557.63	433,896
Oct 2022	27,388	3,150	587.23	368,032
Nov 2022	26,672	3,067	524.82	378,784
Dec 2022	27,221	3,130	542.39	374,032
January 2023	21,228	2,547	486.13	747,888
February 2023	22,750	2,730	489.13	571,058
March 2023	25,464	3,056	532.21	750,373
April 2023	20,150	2,418	439.28	650,344
May 2023	26,094	3,131	712.35	917,121
June 2023	24,765	2,972	614.17	957,626

The company conducted monitoring and analysis of the solid used waste for boiler fuel. Based on the table, it can be concluded that the renewable energy utilized from June 2022 to June 2023 in average is 562.582,9 kwh.

Status: Comply

7.10

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

7.10.1

The company has an inventory of GHG in Identification of Pollution and Emission in 2023. Based on document analysis, the company has identified all source of GHG produced by its operational activity. Identification of significant sources of GHG emissions are identified and mitigation plans have been developed by the company covering mill and estates. Significant GHG emissions include land use change, POME processing, use of fertilizers and pesticides, use of fossil fuels for operations and transportation. The mitigation plans include, among other things, the correct dosage and application of fertilizers as recommended, reducing reuse and recycling, limiting the use of electricity, transportation, and machine maintenance, as well as periodic air quality tests. The company has reported the results of the GHG calculation to the public which was submitted to the RSPO GHG website.

Reduction of fossil fuels in the company has been conducted by using fiber and shells for fuel substitution. Based on the documents review for example: monitoring of pesticide use, monitoring of diesel fuel, identification of HCVs and others it was found that accurate data has been entered into the RSP0 GHG. Calculation of GHG and its monitoring has conducted by sustainability department. GHG emission calculated using RSP0 palm GHG calculator 4.0 Summary of GHG emission for Tengkalat POM and its supply base are listed as follows:

Summary Emission

Product	tCO ₂ e / tProduct
CPO	1.53
PK	1.53

Mill Emission and credits

Description	Unit	Value
Oil palm planted on mineral soil	Ha	9252.92
Oil palm planted area on peat	Ha	779.63
Total oil palm planted area	Ha	10032.55
Conservation area (Forested)	Ha	445.39
Conservation area (non-Forested)	Ha	9.30
FFB Production per hectare	t/ha	32.01
OER	%	23.38
KER	%	5.74

Estate/Plantation field emissions and sinks

Description	Own		Group	3rd Party	
	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e/t FFB	tCO ₂ e/t FFB	Total
Emission Source					
Land Conversion	71409.03	7.12	0.28	0.00	71409.03
CO ₂ Emissions from Fertilizer	8300.92	0.83	0.03	0.00	8300.92
N ₂ O Emissions from Peat	5836.12	0.58	0.02	0.00	5836.12
N ₂ O Emissions from Fertilizer	8323.85	0.83	0.03	0.00	8323.85
Fuel Consumption	1351.77	0.13	0.01	0.00	1351.77
Peat Oxidation	42567.80	4.24	0.16	0.00	42567.80
Sinks					
Crop Sequestration	93922.09	-9.36	-0.36	0.00	-93922.09
Sequestration in Conservation Area	-3290.93	-0.33	-0.01	0.00	-3290.93
Total	40576.48	4.04	0.16	0.00	147386.54

Palm Oil Mill Effluent

POME Produced	t/yr	165412
Diverted to anaerobic digestion	%	100
POME to methane capture (electricity generation)	%	100
COD value before anaerobic digestion	mg/l	91575,25

COD value after anaerobic digestion	mg/l	25340,66
COD removed during digestion	tCOD/tPOME	0,07
POME Calculation Result		
	Unit	Value
POME Produce	t/yr	165412
CH4 (Total)	t/yr	214,35
N2O Calculation Result		
	Unit	Value
Applied N in POME	t/yr	74,44
Total N2O emission from POME	tCO2e/yr	0,5
<p>Based on the GHG calculator data, it can be concluded that the value of CPO and PK has slightly decreased from RC. In 2022 the value is 1.53 tCOe2/t product, while in 2021 the value is 1.82 tCOe2 /t product. There is no new program in the plan and implementation to reduce pollution and emission compare to the previous period, particularly in minimizing GHG emission.</p>		
<p>7.10.2 Based on interview with company management and document verification, it can be confirmed that there has been no new land clearing since 2014. PT GPL conducted New Planting Procedure (NPP) on 13-17 December 2013. It was submitted to the RSPO website on 3 January 2014. There was no comment from stakeholders for its NPP notification.</p>		
<p>7.10.3 The company has identified pollutions and emissions sources from Tengkalat POM 2023, such as CO₂ (boiler, generator, transportation), CH₄ (POME), hazardous waste (WTP, chemical storage), noise (machinery). The pollution and emissions sources for estate are listed on the identification document and management plans for pollution sources 2023, such as emissions (CO₂, CO), noise, chemical waste, organic and inorganic waste and infectious waste.</p> <p>Plans to reduce or minimize significant pollutant have been implemented and monitored as explained in RKL-RPL first semester 2023. Fossil fuel reduction in Indrasakti POM has been implemented by fiber and shell utilization for the boiler.</p>		
Status: Comply		
7.11		
Fire is not used for preparing land and is prevented in the managed area.		
<p>7.11.1 The company has SOP for land clearing including land management, document number GPL/SOP/AGRO-02, Revision 00, effective date 7 August 2012. This procedure explains that the land clearing system: without burning (zero burning), clearing land by slashing, leaving the rest in a certain path (stacking) until it rots in place and using heavy equipment for mechanical grazing.</p> <p>Based on the field observations, interviews with various parties from the company, and document review during ASA-1.1, there was no replanting or new planting.</p>		
<p>7.11.2 The company has reported the implementation of fire incident prevention and protection every semester to Plantation Agency Bangka Regency for first semester in 2023 on 7 January 2023. Actions conducted by the company, including:</p> <ul style="list-style-type: none"> • Having early warnings with fire danger ratings, • Providing fire-prone area maps and water source maps, • Preparing fire control resources, • Having early detection of computer devices connected to internet network, • Providing firefighting facilities, • Preparing post-fire actions to repair damages and minimize potential soil erosion. 		

The report also informed the Infrastructure System and firefighting facilities for instance water tank, water pump, hose, nozzle, light fire extinguisher, hydrants, portable pump and first aid kit.

Based on the interview result with Plantation Agency Bangka Regency, it is known that there has been no fire incident in the company and its vicinity for the last 2 years. The company conducted socialization on 15 November 2022 regarding firefighting program, HCV, and environmental programs to the stakeholders. The event was attended by 60 participants from Gunung Muda Village, Gunung Pelawan Village, Silip Village, Mapur Village, KKPA Gunung Muda Sejahtera, KKPA Mapur Mandiri, KKPA Silip Lestari, and KKPA Ikhtiar Sejahtera.

The company has conducted training regarding fire incident prevention and protection collaborated with Center for Climate Change and Forest and Land Fire Control on 4 June 2021. Training certificate, such as no SF.11.23/BPPIKHL-SUM/KHL/PPI.4/6/2021 for employee with initial IM. Furthermore, regular trainings for firefighting programs were also conducted in Tengkalat POM and all estates, such as in Cemara Estate on 27 June 2023.

Based on the interviews with firefighter team member in Gelam and Cemara Estate, they have comprehensive knowledge for their job description and working program.

Based on the explanation, it can be concluded that the company has sufficient documents for implementing fire incident prevention, monitoring and maintenance of facilities and infrastructure as well as reporting. The stakeholders are also involved in the fire incident prevention program.

7.11.3

The company has reported the implementation of fire incident prevention and protection every semester to Plantation Agency Bangka Regency for first semester in 2023 on 7 January 2023. Actions conducted by the company, including:

- Having early warnings with fire danger ratings,
- Providing fire-prone area maps and water source maps,
- Preparing fire control resources,
- Having early detection of computer devices connected to internet network,
- Providing firefighting facilities,
- Preparing post-fire actions to repair damages and minimize potential soil erosion.

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Status: Comply	
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7.12

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

7.12.1

The land preparation in PT GPL was conducted in 2005. The planting year started from 2006 to 2017. PT GPL conducted New Planting Procedure (NPP) on 13-17 December 2013. It was submitted to the RSPO website on 3 January 2014. There is no comment from stakeholders for its NPP notification.

Disclosure of Liability for MP Evans Group PLC (and its subsidiaries) was submitted to the RSPO on 23 July 2014 and RSPO stated *have no non-compliant land clearance*. All subsidiaries of MP Evans Group PLC are:

- PT Pangkatan Indonesia (North Sumatera)
- PT Bilah Plantindo (North Sumatera)
- PT Sembada Sennah Maju (North Sumatera)
- PT Simpang Kiri Plantation Indonesia (Aceh)
- **PT Gunung Pelawan Lestari (Bangka)**
- PT Prima Mitrajaya Mandiri (East Kalimantan)
- PT Teguh Jayaprima Abadi (East Kalimantan)
- PT Evans Lestari (South Sumatera)

It can be concluded, MP Evans Group PLC and its subsidiaries have no obligation to make Land Use Change Analysis.

RACP is not applicable for this unit, because the land clearing was done after the study of environmental (biodiversity value) and social impact assessment of palm oil development in May 2005 by Environmental Management & Monitoring Pty Ltd.

7.12.2

The company has identified HCV in May 2013 by Aksenta. The team leader was approved by RSPO as the HCV Assessor. Field data collection was conducted on 14-22 January 2013. The HCV identification study scope was in accordance with the location permit 13,565 Ha. The identified HCV area is 454.69 Ha with HCV elements identified as HCV 1.2; HCV 1.3; HCV 1.4; HCV 3; HCV 4.1, HCV 4.2. and HCV 6. Based on the document review, it is known that the company did not develop new land after November 2018. Therefore, the HCV identification is still valid.

7.12.3

Indicator 7.12.3. is irrelevant in Indonesia, until further decision by the RSPO.

7.12.4

The company has HCV management plan listed in the Management and Monitoring Plan of HCV for 2021 – 2023. The management plan was prepared based on the results of a management plan review for the previous period which was conducted in a participatory approach involving the surrounding community and employees and was reported to BKSDA Bangka. The HCV management and monitoring plan includes:

- Installation of HCV signboards
- Reforestation
- Monitoring flora and fauna
- Socialization of HCV and the environment to the community (external)
- HCV patrol
- Vegetation analysis

PT GPL shows the HCV management implementation in 2022-2023, such as:

- Socialization of HCV and the environment to the community on 15 November 2022 regarding firefighting program, HCV, and environmental programs to the stakeholders. The event was attended by 60 participants from Gunung Muda Village, Gunung Pelawan Village, Silip Village, Mapur Village, KKPA Gunung Muda Sejahtera, KKPA Mapur Mandiri, KKPA Silip Lestari, and KKPA Ikhtiar Sejahtera.
- Training on animal monitoring for employees in October 2022.

- Reforestation in HCV 1, 3, and 4 in October 2022 and May 2023.
- Maintenance for HCV sign board in HCV 1, 3, 4, 6 in August 2022, December 2022, and April 2023.
- Training on mitigation conflict with animals in December 2022, and April 2023.
- Socialization of HCV and the environment to the employees in December 2022, and April 2023.
- HCV patrol once a month.
- Monitoring for no chemical application in river border once a month.

Regarding the HCV area management and protection plan, it is contained in several documents, for instance:

- Annual Review HCV Action Plan PT Gunung Pelawan Lestari July 2022 to June 2023, explains the HCV management plan by installing HCV signboards such as prohibit hunting, burning, cutting trees and using chemicals, especially in riparian areas.
- SOP document for riparian buffer management which explains:
Small river < 10 meters HCV area 50 meters to the left and right of the river.
Small river > 10 meters HCV area 100 meters to the left and right of the river.

Regarding to the previous NC in RC, the company has not been able to show evidence of the implementation of the water resources HCV management plan in accordance with the HCV Management plan and SOP they have. It was based on these observation findings:

- In the Bukit Damar HCV area block J13 there is a river that flows throughout the year (result of the interview), there is no boundary for the conservation area on the riparian, open fertilization activities with the MOP type were also found in that area. Based on the verification results of the 2013 HCV assessment documents, it was explained that the HCV area of Damar block J13 is a water response area that has an important hydrological system function that needs to be maintained.
- There is a boundary for the conservation area in the F38 Gelam Estate block of the river, in that area pesticide spraying was also found in the riparian area, this was also confirmed from the results of verification of the work form document for the foreman of the pesticide application which also explained that an application had been made pesticides (spraying circle path) in block F38 on 28 September 2022.

Auditor verification in this ASA 1.1, based on the interview with employees and field observation in Tengkalat Estate block E46, Gelam Estate block F38, and Cemara Estate block J13, it can be seen that the company has a well-managed river border area. There were red painted trees approximately 10 meters from the river border, as the sign for no chemical application in the area. During the audit, there is no trace of chemical application in the area as well. The company also conducted river water quality testing every semester with accredited lab KAN (LP-894-IDN). Based on the testing result, all parameters are complied with the standard.

Water quality testing result in Downstream and Upstream Tengkalat River in 24 March 2023

Parameter	Downstream	Upstream	Unit	Standard
Temperatur	27.06	26.9	0C	Deviasi # 3
TSS	17	12	mg/L	50
Color	10.12	8.09	Pt-Co	50
pH	6.92	7.84	-	6 - 9
Amoniak (NH ₃)	0.07	0.04	mg/L	0.2
NO ₃	4.14	3.03	mg/L	10
BOD ₅	2.89	2.12	mg/L	3
COD	9.21	6.23	mg/L	25
DO	6.09	5.32	mg/L	Minimum 4

As the company's concern on the integrated management plan, the company conducted a consultation with relevant stakeholders regarding various topic, such as HCV, SIA evaluation, SOP, RSPO, environmental issue, and company policy on 15 November 2022.

Based on the explanation, it can be concluded that PT GPL has a well-managed HCV area, including the water resources management.

7.12.5

Based on the interview with employees, Silip and Gunung Pelawan Village & Plantation Agency, HCV assessment result review, and field observation, it can be concluded that there is no area identified as the area to fulfil the local community basic needs or to be protected as the local community rights.

7.12.6

The company has SOP regarding prohibition to hunt and harm the RTE species in SOP for HCV management and monitoring (No. GPL/SOP/Umum-07, Revision 01 April 1, 2017). If there is a violation on this, the company will issue a warning letter to the employee. Based on the interview and updated monitoring result, there is no incident with RTE for the last two years. One of the RTE species found in the updated monitoring result is black-winged kite (*Elanus caeruleus*).

The company also conducted the HCV socialization to employees, such as for division 1 in Gelam Estate on 7 March 2023 attended by 110 participants. Socialization for employees in Cemara Estate on 13 June 2023 attended by 108 participants.

Based on the interview with community from Silip Village and Gunung Pelawan Village, they have got the information on HCV and environment through the socialization in 15 November 2022 and there was no incident with RTE species for the last two years.

Based on the explanation, it can be concluded that PT GPL has a well-managed HCV area, especially regarding to RTE, the implementation is in accordance to the policy and SOP.

7.12.7

PT GPL conducted the HCV monitoring program, including the RTE species. The monitoring results will be evaluated and become the input for the upcoming HCV management plan. The company has HCV management review and evaluation document for July 2022 to June 2023. The review results for instance:

- Socialization of HCV and the environment to the community in December 2022.
- Training on animal monitoring for employees in October 2022.
- Reforestation in HCV 1, 3, and 4 in October 2022 and May 2023.
- Maintenance for HCV sign board in HCV 1, 3, 4, 6 in August 2022, December 2022, and April 2023.
- Training on mitigation conflict with animals in December 2022, and April 2023.
- Socialization of HCV and the environment to the employees in December 2022, and April 2023.
- HCV patrol once a month.
- Monitoring for no chemical application in river border once a month (no chemical application in the river border based on the monitoring results).
- Most of the management action plan made in the HCV management plan has been implemented.
- One of the RTE species found in the updated monitoring result is black-winged kite (*Elanus caeruleus*).
- There is no incident between animals and humans in the area.

Based on the field observation to HCV area in Tengkalat Estate block E46, Gelam Estate block F38, and Cemara Estate block J13, it can be seen that the area is well managed. There is no indication of disturbance to the HCV areas and the HCV signboard is still well maintained. The interview result with relevant employees stated that they understand their roles in managing and monitoring the HCV area.

Based on the explanation, it can be concluded that PT GPL has a well-managed HCV area, the implementation is in accordance to the policy and SOP.

7.12.8

The land preparation in PT GPL was conducted in 2005. The planting year started from 2006 to 2017. PT GPL conducted New Planting Procedure (NPP) on 13-17 December 2013. It was submitted to the RSPO website on 3 January 2014. There are no comments from stakeholders for its NPP notification.

Disclosure of Liability for MP Evans Group PLC (and its subsidiaries) was submitted to the RSPO on 23 July 2014 and RSPO

stated *have no non-compliant land clearance*. All subsidiaries of MP Evans Group PLC are:

- PT Pangkatan Indonesia (North Sumatera)
- PT Bilah Plantindo (North Sumatera)
- PT Sembada Sennah Maju (North Sumatera)
- PT Simpang Kiri Plantation Indonesia (Aceh)
- **PT Gunung Pelawan Lestari (Bangka)**
- PT Prima Mitrajaya Mandiri (East Kalimantan)
- PT Teguh Jayaprima Abadi (East Kalimantan)
- PT Evans Lestari (South Sumatera)

It can be concluded, MP Evans Group PLC and its subsidiaries have no obligation to make Land Use Change Analysis.

RACP is not applicable for this unit, because the land clearing was done after the study of environmental (biodiversity value) and social impact assessment of palm oil development in May 2005 by Environmental Management & Monitoring Pty Ltd.

	Status: Comply	
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3.2 Conformity Checklist of Certificate and Trademark Use

1.	Evidence of permission or approval certificate and trademark from Certification Body which submitted by Client	X or √
ASA-1.1	The company does not use RSPO 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-1.1	The company does not use RSPO logo.	√
	Status: Comply	
3.	Implementation of Certificate and Trademark is not used on product	X or √
ASA-1.1	The company does not use RSPO logo.	√
	Status: Comply	
4.	Controlling of Certificate and Trademark, including withdrawing inappropriate trademark.	X or √
ASA-1.1	The company does not use RSPO logo.	√
	Status: Comply	

3.3 Summary of RSPO Partial Certification.

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

MP Evans Group PLC Time Bound Plan (TBP) is explained in table 1.10. MP Evans Group PLC has forty six (46) management units with six (6) mills. MP Evans Group PLC has informed the TBP progress, MUTU has considered that MP Evans Group PLC is complied with the RSPO requirement for TBP. The Time Bound Plan was revised and declared by MP Evans Group PLC on 3 October 2022.

MUTU has verified partial certification for un-certified unit's subsidiary of MP Evans Group PLC based on their Time Bound Plan. There are two (2) uncertified mills and twenty four (24) uncertified estates of MP Evans Group PLC. MUTU Auditor verified positive assurance against the company internal audit and supporting evidence as well as any information from others sources.

MUTU Auditor has verified company partial certification and concludes that:

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

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
2.1.1	Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	<p>Yes and positive assurance is developed under MP Evans Group PLC</p> <p><i>Auditor verification</i> Based on the document review, there is a company internal audit that was conducted on 29 – 31 August 2022. Positive assurance is at this table that is also been verified.</p>
2.1.2	<p>No replacement after dates defined in Nis Criterion 7.3 of:</p> <ul style="list-style-type: none"> • Primary forest. • Any area identified as containing High Conservation Values (HCVs). • Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3. 	<ul style="list-style-type: none"> - PT. Simpang Kiri Plantation Indonesia. RACP is not applied for this unit because the last land clearing was conducted before November 2005. The unit does not have mill. - PT. Evans Lestari (PT.EL) has conducted HCV and SIA identification by Forestry Faculty of Institute Pertanian Bogor (IPB) on March 2013 led by Dr. Ir. Jarwadi Budi Hernowo Msc, before land clearing. Therefore the unit has no liability related to RACP. PT Evans Lestari also conducted NPP on 17 December 2013 conducted by Certification Body of Control Union. - PT Bumi Mas Agro: HCV has conduct on 2014 and disclose the land clearing after November 2005 was conducted by non member. <p><i>Auditor verification</i> Based on internal audit results and evidence provided</p>

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p>(communication to RSPO on liability disclosure) the three uncertified units of:</p> <p>PT Simpang Kiri Plantation Indonesia: Last land clearing happened before November 2005 and there is no new land clearing of new planting.</p> <p>PT Evans Lestari Land clearing was conducted after November 2005 but has been first conducted HCV identification before land clearing. Liability of disclosure has been sent to RSPO Compensation Team on 23 July 2014.</p> <p>PT Bumi Mas Agro Planting year in PT Bumi Mas Agro consist of 2012 to 2017. Previously PT Bumi Mas Agro owned is not RSPO member and since 2017 has been take over by MP Evans Plc (RSPO member).</p>
2.1.3	Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	<p>There is new planting after 1 Jan 2010 in PT Bumi Mas Agro, which conduct by non member RSPO. Since 2018 PT Bumi Mas Agro has been takeover by RSPO member (MP Evans Plc).</p> <p><i>Auditor verification</i> Based on internal audit, documented time of land clearing and liability disclosure sent to RSPO, there is new planting/land clearing after 1st January 2010 for PT Gunung Pelawan Lestari and PT Evans Lestari but NPP has been conducted for these units. Evidence of submission to RSPO is provided and the NPP notification are at RSPO website.</p> <p>PT Bumi Mas Agro has new development after 1 January 2010 without NPP and will be subject to sanction.</p>
2.1.4	Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	<p>There is land conflict in PT Bumi Mas Agro and has been resolved.</p> <p><i>Auditor verification</i> Based on evidence provided, the company merely conducted planting on the area that has been compensated from the land owner by FPIC. The documentation of each land compensation/leasing is documented.</p>
2.1.5	Any Labour disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	<p>Company has internal and external grievance mechanism. There is labor disputes in PT Bumi Mas Agro and has been documented. There is no information from public source and RSPO website on any labour conflict for uncertified unit of the group subsidiaries.</p>

Un-Certified Units or Holdings		
Section	Requirement	Concerns to Discuss, if any
		<p><i>Auditor verification</i></p> <p>There is labor disputes in uncertified unit and resolved process has been documented. There is no information from RSPO website on any labour conflict for uncertified unit of the group subsidiaries and also from stakeholder consultation during 1st surveillance audit of the PT PMM.</p>
2.1.6	Any Legal non-compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	<p>Yes, there is process for land legality.</p> <p><i>Auditor verification</i></p> <p>Land legal process is still going on and there is a detail update progress documented by the company for each year.</p> <p>Update legal for PT Evans Lestari: the company has got plantation business permit (IUP) from Bupati Decree of Musi Rawas No. 891/KPTS/Disbun/2012 dated 12 November 2012 for 20,000 ha. It is in accordance with the scale of the company location permit (Decree of Bupati Musi Rawas No. 578/KPTS/BPM=PTP/2012 dated 30 October 2012 for 20,000 ha). However the location permit has been expired – need further HGU process information or any other legal process.</p>

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 RC Assessment

NCR No.	: 2022.01	Issued by	: Radityo Puspanjana
Date Issued	: 11 November 2022	Time Limit	: 9 February 2023
NC Grade	: Major	Date of Closing	: 21 January 2023
Standard Ref. & Requirement	<p>7.12.4 HCV and HCS forests after November 15, 2018, peatland and other conservation areas that have been identified, protected and/or enhanced. Integrated management plans to protect and/or enhance HCV and HCS forests, peatland and other conservation areas are developed, implemented and adapted if needed, and are complemented by monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan was developed in consultation with relevant stakeholders and covers the area that is directly managed and considers the broader level of the relevant landscape (if the landscape has been identified).</p>		
<p>Evidence observed (filled by auditor): Regarding the HCV area management and protection plan, it is contained in several documents, namely:</p> <ol style="list-style-type: none"> PT GPL's 2022 HCV review document explains the HCV management plan by installing HCV signboards such as prohibiting activities that endanger the area, prohibition of hunting, burning, cutting trees and using chemicals, especially in riparian areas. SOP document for riparian buffer management Number GPL/SOP/UMUM-15 dated 7 August 2012 which explains: <ul style="list-style-type: none"> - Small river < 10 meters, HCV area 50 meters to the left and right of the river. - Small river > 10 meters, HCV area 100 meters to the left and right of the river. - Point 3.3.4 for oil palm trees is marked with an X, no need for fertilization and chemical treatments, the saplings and shrubs are allowed to grow naturally. - The company shows PT GPL's 2021-2023 HCV management and monitoring documents which explain that HCV patrols are carried out every month and maintenance of conservation attributes is carried out twice a year. <p>As the implementation of these procedures during the audit process, evidence of the implementation of the plan can be shown, including:</p> <ul style="list-style-type: none"> - PT GPL's 2022 HCV review document explains the realization of river riparian management, maintenance of HCV boundary signs and HCV signs is carried out every 6 months, the last realization being on 22 April 2022. - HCV patrols for the period July 2021 – June 2022 explained that the conservation area boundary markers on the river bank area were in good condition. <p>However, based on the results of field visits in the riparian HCV areas, it is known that:</p> <ul style="list-style-type: none"> - In the HCV area of Evidence Damar block J13 Cemara Estate there is a river that flows throughout the year (result of interviews with field visit facilitators). From the results of observations in the area it is known that there are no signs of a conservation area boundary on the riparian. In that area also found open fertilization activities with the type of MOP. Based on the verification results of the 2013 HCV assessment document, it was explained that the HCV area of Damar Block J13 is a water catchment area that has an important hydrological function that needs to be maintained. - There is a conservation area boundary on the F38 Gelam Estate block riparian (core). In that area, pesticide spraying was also found in the riparia river. This was also confirmed by the results of verification of the pesticide application Foreman Work Form document which also explained that a pesticide application (spraying circle path) had been carried out in block F38 on September 28, 2022. <p>Non-Conformance Description (filled by auditor): The company has not been able to show evidence of the implementation of the water resources HCV management plan in accordance with the HCV Management plan and SOP they have.</p> <p>Root Cause Analysis (filled by organization audited):</p> <ul style="list-style-type: none"> • The MDP agronomy system that is currently in effect is from the first day of work, the assistant is directly responsible for the division (6 months), after that a briefing is carried out, both theoretically and technically on matters related to company policies and regulations. 			

- Supervision from field assistants who do not have sufficient understanding of HCV management, especially in riparian areas.

Correction *(filled by organization audited):*

- Evaluating the MDP agronomy induction training program to equip the assistants to be ready to work.
- The S&C Assistant provides socialization on spray limits and chemical application in riparian areas / HCV to agronomist assistants and workers who handle chemical application (fertilizer and spray) on a regular basis.
- Bukit Damar HCV area block J13 Cemara Estate.
- Make signs prohibiting spraying and chemical application in the HCV area.
- Paint (red) marks on the outermost palm trees that enter the riparian area along the river flow.
- The HCV Area Block F38 Gelam Estate.
- Repaint the existing spray boundaries and put-up signs prohibiting spraying and chemical application in the HCV area.

Corrective Action *(filled by organization audited):*

1. The HR-Training Department monitors the implementation of the new agronomy/assistant MDP induction program along with the materials presented.
2. The S&C assistant and agronomy assistant carry out regular and continuous monitoring of HCV areas to ensure HCV areas are free from spraying and fertilizing activities.

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

Auditor verification January 21, 2023

The company shows evidence of improvement in the form of:

Cemara Estate

- Minutes of maintenance of riparian dated November 12 2022 made by Krani S&C and known to the estate manager regarding the manufacture/maintenance of riparian by applying red paint to 46 palm oil trees in block J13 division 1 KKPA as a riparian boundary. There are photos of field activities.
- Minutes of outreach related to riparian management to spray employees on 29 November and 1 December 2022 and fertilizer employees on 29 November and 2 December 2022.
- Minutes of outreach related to riparian management to staff on 29 November.

Gelam estate

- Minutes of maintenance of riparian dated November 18 2022 which was made by the S&C clerk and known to the estate manager regarding the maintenance of riparian by applying red paint to 46 palm oil trees in block F38 division 1 Gelam estate as a riparian boundary. There are photos of field activities.
- Minutes of outreach related to riparian management to fertilizer and spray employees November 23-24 2022 and a summary of the evaluation of this activity as many as 17 participant.
- Minutes of outreach related to riparian management to staff on 19 November 2022.

Gunung Pelawan estate

- Minutes of outreach regarding riparian management to spray and fertilizer employees on 7 -9 December 2022.
- Minutes of outreach related to riparian management to staff on 24 November 2022.

Tengkalat estate

- Minutes of outreach related to riparian management to spray and fertilizer employees on 30 November 2022, and a summary of the evaluation of the activity as many as 45 people.
- Minutes of outreach related to riparian management to staff on 23 November 2022.

Based on the evidence of improvement submitted, it can be concluded that this discrepancy has been fulfilled and will be observed again in the next activity.

Follow up on next audit *(filled by auditor):*

Verification on 15 September 2023:

Based on the interview with employees and field observation in Tengkalat Estate block E46, Gelam Estate block F38, and Cemara Estate block J13, it can be seen that the company has a well-managed river border area. There were red painted trees approximately 10 meters from the river border, as the sign for no chemical application in the area. During the audit, there is no trace of chemical application in the area as well.

Verified by : **Dinda Febrima Napitupulu**

3.4.2. Identification of Findings, Corrective Actions and Observations at ASA-1.1 Certification Assessment

NCR No.	:		Issued by	:	
Date Issued	:		Time Limit	:	
NC Grade	:		Date of Closing	:	
Standard Ref. & Requirement	:				
Evidence observed (filled by auditor):					
Non-Conformance Description (filled by auditor):					
There is no nonconformity in the ASA-1.1					
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	6.2.3	<p>There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, and other legal labour requirements.</p> <p>UoC showed the Management Decree No. 016/SK.UPAH/GPL-HR/XII/2022 concerning the wage structure and scale of permanent worker (SKU-H) of PT Gunung Pelawan Lestari in 2023. The document with the lowest grade of 0 to 2 years work period received the wage in accordance with the provincy minimum wage while workers with more than 2 to 7 years of work period received the minimum wage plus additional wages of Rp. 1,250/month. Based on Government Regulation Number 36 of 2021 concerning Wages article 24 paragraph 1, it's stated that the minimum wage applies to workers with less than 1 (one) year of work period at the company. Furthermore, paragraph 2 states that wages for workers with a work period of 1 (one) year or more must guided by the wage structure and scale.</p> <p>Based on the description above, companies were encouraged to adjust wages for workers with a service period of 1 year or more in accordance with the applicable regulations.</p>
2	7.7.2	<p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p> <p>Based on the Peat inventory guide, it is explained that reporting is done at least twice, namely:</p> <ul style="list-style-type: none"> • First reporting within 12 months after implementation of the 2018 RSPO P&C (no later than 15 November 2019), or before the first 2018 RSPO P&C certification audit, whichever comes first • Second reporting within 12 months prior to the 2018 P&C revision (November 2022 - November 2023) <p>The company has carried out a peat inventory according to the RSPO peat inventory template and the report has been sent to the RSPO secretariat as evidenced by the latest email sent by Arvind Devadasan to ghg@rspo.org on January 27 2021. Furthermore, the company has the opportunity to report the Peat Inventory back to the secretariat RSPO before 5 November 2023 for the second period.</p>
3	7.7.6	<p>All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance. (May 2019).</p> <p>Subsidence Pole</p> <p>Based on the results of field visits to subsiden stake number 03 in block E52 (Estate Inti) and subsiden stake number 04 in block E54 (Mapur Mandiri Cooperative), it is known that the subsiden stake has been equipped with a protective fence with a size of ± 50 cm x 50 cm and a height of 50 cm . From the results of the field visit, it was discovered that the subsidence stakes had the potential to experience disruption (for example during harvesting activities).</p> <p>Referring to the RSPO Manual On Best Management Practices (BMPs) For Existing Oil Palm Cultivation On Peat in the Measurement of Peat Subsidence section, it is explained that "An area of 2 m x 2 m around the subsidence stake must be securely fenced to prevent interference which will result in incorrect readings. accurate". Based on the explanation above, companies have the opportunity to evaluate prevention of disturbances in subsidence stakes which will result in</p>

	<p>inaccurate readings in accordance with the RSPO Manual On Best Management Practices (BMPs) For Existing Oil Palm Cultivation On Peat.</p> <p>Water Management</p> <p>Based on the results of a study of PT Gunung Pelawan Lestari's rainfall documents for the 2023 period, it is known that during the last 6 months (March – August 2023) rainfall in the PT GPL area was very small with a total of 63 rainy days and the average rainfall was 12 mm/rainy day. Based on the results of the field visit, it was discovered that the water conditions in blocks E52 and E54 had apparently dried up. Based on this, the company has the opportunity to ensure that the water conditions in the PT GPL peat area comply with best cultivation practices and applicable laws and regulations.</p>
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3.4.4. Noteworthy Positive Components

No	Ref. Std.	Description
1	-	Company commitment to implementing a sustainable palm oil management system.
2	-	Having competent human resources in each field and providing good documents
3	-	Contribute to improving the economic development of residents around the company area.
4	-	Provision of reverse osmosis to supply water needs for employees

3.5 Summary of Arising Issues from Public and Auditor Verification







Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Bangka Regency National Land Agency</p> <ul style="list-style-type: none"> • There is overlapping land between PT Timah and PT GPL. • The company routinely submits land use reports every year. • The company has valid HGU and HGB. • The company also has HGU boundaries in the form of clear benchmarks in the field. 	<p>Regarding land overlap, the company has carried out area management cooperation between PT Timah and PT GPL which is discussed in detail in indicator 1.1.6.1.</p>
<p>TBS Suppliers (Gunung Muda Sejahtera Cooperative and CV Multi Nusa Pratama)</p> <ul style="list-style-type: none"> • The company regularly carries out outreach regarding company policies, PPE and others. • The company also determines the FFB price for plasma which refers to the determination of the Department of Agriculture and Food Security of the Bangka Belitung Islands Province and the determination of suppliers for third parties is carried out every day via email notification to each supplier. • There are no complaints regarding payment 	<p>There are no issues requiring further clarification and this information has been explained in the relevant indicators.</p>
<p>Environmental Agency Bangka Regency Interviewee: Head of Controlling Division 11 September 2023</p> <ul style="list-style-type: none"> • PT GPL regularly report their RKL RPL and no parameter is above the quality standard. • No environmental issue caused by the company's operational activities. • PT GPL utilized POME to LA. 	<p>There is no negative issue needs further clarification.</p>
<p>Manpower Agency of Bangka District (<i>Dinas Tenaga Kerja Perindustrian dan Perdagangan Kabupaten Bangka</i>) Interviewee: Mediator of Industrial Relation Date: 12 September 2023</p> <ul style="list-style-type: none"> • The company has provided wages to workers as stipulated in the Provincy Minimum Wage of 2023. • The company has a Bipartite and 1 labor union, namely SPGPLM and has been registered at the Manpower Agency. There were 2 more labor union registered in Manpower Agency but currently the active labor union was only SPGPLM. • The company had registered their Collective Labor Union in 2023. • All workers have been registered in the Social security insurance and health insurance. • The communication between the agency and the company has went well. • There were no workers under the age of 18 years old. 	<p>There was no negative issue that need further verification.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> • There were no negative issues received by agencies related to employment. • There were no contract workers and daily workers reported to the Agency. 	
<p>Workers Cooperative Sawit Lestari Interviewee: The head of Workers Cooperative Date: 5 September 2023</p> <ul style="list-style-type: none"> • The cooperative is engaged in the business of providing groceries. • The location of workers cooperatives were in Cemara Estate, Gelam Estate, Tengkalat Estate, and 2 workers cooperatives in Gunung Pelawan Estate. • The company provides support for the existence of employee cooperatives by facilitating cooperative legal documents, cooperative building, and electricity. • Members of the employee cooperative currently was approximately 1,928 workers. • Principal savings of Rp. 50,000 while the mandatory deposit is Rp. 10,000/month. • The annual meeting for the period of 2022 hasn't been held yet. It's planned to be held in September 2023. Meanwhile, the last annual meeting for the period of 2021 was held in August 2022. 	<p>There was no negative issue that need further verification.</p>
<p>Labor Union (Serikat Pekerja Gunung Pelawan Lestari Mandiri) Interviewee: Head of labor union Date: 12 September 2023</p> <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 around 1,900 workers. The membership of labor union is voluntary. • Collective labor union for the period of 2023 to 2025 has been drafted in the early 2023 and labor union was involved in the drafting. • Worker's wage were referred to provincial minimum wage. • Job vacancies were announced by UoC wall-boards and social media. • Internal meetings of labor union were held every Friday, while the bipartite meetings held once a month or whenever its needed. 	<p>There was no negative issue that need further verification</p>
<p>LKS Bipartite Interviewee: Worker's Representative Date: 12 September 2023</p> <ul style="list-style-type: none"> • There was no intervention in the implementation of any bipartite decision against each representative (workers and the company). 	<p>There was no negative issue that need further verification</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> • Last bipartite meeting was held in August 2023 regarding the consultation of workers in attendance. • The organization of bipartite consist of 3 representative of workers and 2 representative of company. • Collective labor union for the period of 2023 to 2025 has been drafted in the early 2023. • Worker's wage were referred to provincial minimum wage. • Job vacancies were announced by UoC wall-boards and social media. • Internal meetings of bipartite held once a month or whenever its needed. 	
<p>Previous Land Owner / Customary Rights Owner Interviewee: 2 person on behalf of Zulfikar and Maryono Date: 12 September 2023</p> <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 are. • 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>There were no negative issues.</p>
<p>KPKS Gunung Muda Sejahtera (Contractor in FFB Transporting) Interviewee: Director Date: 12 September 2023</p> <ul style="list-style-type: none"> • Cooperating with PT Gunung Pelawan Lestari has been going for 4 years in the FFB transporting. • The agreement between the contractor and the company was valid for a year until December 2023. • PPE for contractor workers is provided by the contractor. • There were 5 contractor workers. • The communication between the company and the contractor went well, there were no complaints regarding payment. • There was an aspiration related to the estate road condition. • The company (PT GPL) has conducted an evaluation of contractors regarding the compliance with regulations in every updated agreement. • Contractor workers received training related to OHS and the socialization of the code of ethics from PT. GPL. 	<p>There were no negative issues.</p>
<p>PT Wana Eka Bina Manunggal (Contractor in CPO Transporting) Date: 12 September 2023</p> <ul style="list-style-type: none"> • Cooperating with PT Gunung Pelawan Lestari has been going for 7 years in the CPO transporting. 	<p>There were no negative issues.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<ul style="list-style-type: none"> The agreement between the contractor and the company was valid for a year until December 2023. PPE for contractor workers is provided by the contractor. There were 20 contractor workers. The communication between the company and the contractor went well, there were no complaints regarding payment. The company (PT GPL) has conducted an evaluation of contractors regarding the compliance with regulations in every updated agreement. Contractor workers received training related to OHS and the socialization of the code of ethics from PT. GPL. 	
<p>Gender Committee Interviewees:</p> <ul style="list-style-type: none"> Head of gender committee in Gerlam Estate. Head of gender committee in Cemara Estate. Head of gender committee in Gunung Pelawan Estate. Head of gender committee in Tengkalat Estate. <p>Date: 12 September 2023</p> <ul style="list-style-type: none"> There were no complaints or issues related to sexual harassment and violence against women or men. The gender committee had socialized some policies related to gender, sexual harassment, and domestic violence. Gender committees' program were related to monthly baby check-up and vitamin supplies every month. Female workers who placed as pesticide application workers if they reported pregnant will be transferred to the non-agrochemical works, such as daycare officer. UoC had given the right of maternity paid leave and period paid leave. 	<p>There were no negative issues.</p>
<p>Silip Village Interviewee: Head of the Village Date: 12 September 2023</p> <ul style="list-style-type: none"> The communication between the company and the village went well, there were no complaints against the company. One of the positive impact of the company's existence is the better road access and the local workers hiring. CSR has been realized by the Company, for example: distribution of basic necessities. There were no issues of environmental pollution or land fires happened in the company. Job vacancies were transparently communicated to the village. The company has formed a Fire Care Society. The company has provided the socialization related to the prohibition of bribery, corruption and protected animals. 	<p>There were no negative issues.</p>

Public Issues (Institution/ NGO/Community)	Auditor Verification
<p>Gunung Pelawan Village Interviewee: Head of the Village Date: 13 September 2023</p> <ul style="list-style-type: none"> • The communication between the company and the village went well, there were no complaints against the company. • One of the positive impact of the company's existence is the better road access and the local workers hiring. • CSR has been realized by the Company, for example: distribution of basic necessities. • There were no issues of environmental pollution or land fires happened in the company. • Job vacancies were transparently communicated to the village. • The company has formed a Fire Care Society. • The company has provided the socialization related to the prohibition of bribery, corruption and protected animals. 	<p>There were no negative issues.</p>
<p>Bangka Regency Food and Agriculture Service September 11, 2023</p> <ul style="list-style-type: none"> • There are no changes regarding plantation business permits • The company has regularly reported developments in its plantation business • The last plantation business assessment was carried out in 2021 • Service representatives understand the procedures for requesting information and submitting complaints. • There are no negative issues related to the implementation of plantation businesses at PT GPL • The company has submitted regular reports regarding the prevention and management of forest and land fires every year. • The company has built a plasma plantation • CSR implementation has been presented in the LPUP 	<p>There are no issues requiring further clarification and this information has been explained in the relevant indicators</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> <table border="0" data-bbox="470 777 1331 1092"><tr><td data-bbox="470 777 779 861">PT Gunung Pelawan Management Representative</td><td data-bbox="1039 777 1331 861">PT Mutuagung Lestari Tbk Lead Auditor</td></tr><tr><td data-bbox="535 903 714 1050"></td><td data-bbox="1071 903 1299 1008"></td></tr><tr><td data-bbox="470 1029 779 1092"><u>Donald Ginting</u> Tuesday, 26 September 2023</td><td data-bbox="1039 1029 1331 1092"><u>Leonada</u> Tuesday, 26 September 2023</td></tr></table>	PT Gunung Pelawan Management Representative	PT Mutuagung Lestari Tbk Lead Auditor			<u>Donald Ginting</u> Tuesday, 26 September 2023	<u>Leonada</u> Tuesday, 26 September 2023
PT Gunung Pelawan Management Representative	PT Mutuagung Lestari Tbk Lead Auditor						
							
<u>Donald Ginting</u> Tuesday, 26 September 2023	<u>Leonada</u> Tuesday, 26 September 2023						

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

No	Institution/ NGO/ Community	Address	Phone/ Email	Form of Communication	Date of Contact	Response	
						Yes	No
1.	National Land Agency	Bangka District	-	Direct	11/09/2023	✓	
2.	TBS Suppliers (Gunung Muda Sejahtera Cooperative and CV Multi Nusa Pratama)	Bangka District	-	Direct	12/09/2023	✓	
3.	Environmental Agency	Bangka District	-	Direct	11/09/2023	✓	
4.	Tengkalat POM: <ul style="list-style-type: none"> • 2 housing residents • 1 WWTP officer • 1 biogas officer • 1 composting officer • 1 WTP officer • 1 warehouse head • 1 warehouse clerk • 1 mechanical officer • 1 electrician supervisor • 1 loading ramp operator • 1 sterilizer operator • 2 boiler operators • 2 press station operators • 1 engine room operator 	PT Gunung Pelawan Lestari	-	Direct	11/09/2023	✓	
5.	Gunung Pelawan Estate: <ul style="list-style-type: none"> • 2 warehouse officers • 1 workshop officer • 1 firefighter member 	PT Gunung Pelawan Lestari	-	Direct	12/09/2023	✓	
6	Cemara Estate: <ul style="list-style-type: none"> • 2 Daycare Officers • 1 Warehouse Officer • 1 Warehouse Clerk • 1 Mechanical Head • 3 spray workers and 1 mador • 2 FFB loaders • 1 Dump Truck Driver • 3 harvesters and 1 foreman • 3 Lose Fruit picker 	PT Gunung Pelawan Lestari	-	Direct	13/09/2023	✓	
7	Tengkalat Estate <ul style="list-style-type: none"> • 2 Daycare Officers • 1 Warehouse Officer • 1 Warehouse Clerk • 1 Mechanical Head • 3 harvester, 3 lose fruit picker And 1 	PT Gunung Pelawan Lestari	-	Direct	14/09/2023	✓	

	foreman • 2 manuring worker, 2 spraying worker and 1 foreman						
8	Manpower Agency	Bangka District	-	Via phone	12/09/2023	✓	
9	Workers Cooperative Sawit Lestari	Bangka District	-	Direct Interview	12/09/2023	✓	
10	Labor Union (Serikat Pekerja Gunung Pelawan Lestari Mandiri)	PT Gunung Pelawan Lestari	-	Direct Interview	12/09/2023	✓	
11	LKS Bipartite	PT Gunung Pelawan Lestari	-	Direct Interview	12/09/2023	✓	
12	Gunung Pelawan Village	PT Gunung Pelawan Lestari	-	Via phone	13/09/2023	✓	
13	Silip Village				12/09/2023	✓	
14	Previous Land Owner on behalf of Zulfikar and Maryono	PT Gunung Pelawan Lestari	-	Direct Interview	12/09/2023	✓	
15	Labor union of Mill and Estate	PT Gunung Pelawan Lestari	-	Direct Interview	12/09/2023	✓	
16	KPKS Gunung Muda Sejahtera	Bangka District	-	Direct Interview	12/09/2023	✓	
17	PT Wana Eka Bina Manunggal	Bangka District	-	Via phone	12/09/2023	✓	
18	Gender Committee in GME, CME, GPE, and TGE.	PT Gunung Pelawan Lestari	-	Direct Interview	12/09/2023	✓	
19	Sawit Watch	Bogor	info@sawitwatch.or.id	Via Email	05/09/2023	-	✓
20	WWF	Jakarta	wwf-indonesia@wwf.or.id	Via Email	05/09/2023	-	✓
21	Walhi	Jakarta	informasi@walhi.or.id	Via Email	05/09/2023	-	✓
22	AMAN	Jakarta	rumahaman@cbn.net.id	Via Email	05/09/2023	-	✓
23	food and agriculture department of Bangka district	Bangka District	-	Via phone	11/09/2023	✓	

Appendix 2. Assessment Program

DATE	11-16 September 2023	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
Monday, 11 September 2023		
08.40 – 10.00	Jakarta (CGK) → Pangkalan Pinang (PGK) / Garuda Indonesia GA-136	All Auditor
10.30 – 12.00	Public Consultation : Public consultation with stakeholder to relevant agency in Bangka Regency	All Auditor
12.00 – 14.00	Break	All Auditor
14.00 – 16.00	Travel to Site	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) 	All Auditor
Tuesday, 12 September 2023		
08.00 – 12.00	Public Consultation : <ul style="list-style-type: none"> Public consultation with affected communities around the plantation and previous land owners. (direct interview) Interviews with Gender Committees, Trade Unions, Local contractors, Employee cooperatives, third party suppliers (direct interview or by phone) 	RAB
08.00 – 12.00	Field Observation to Gunung Pelawan Estate & Gunung Pelawan KKPA Aspect to be verified: <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries) and HCV Implementation of Environmental Aspects, Conservation, Waste Management, Waste, LA and HCV Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Observation of warehouses for chemicals, fertilizers, hazardous waste warehouses, workshops, fire control facilities and worker facilities (housing, schools, religious facilities) 	LEO / KID / DNA JON/DNA
12.00 – 14.00	Break	All Auditor
14.00 – 16.30	Field observation to Tengkalat POM <ul style="list-style-type: none"> Supply Chain Flow (Receiving FFB, Weighing FFB), CPO tanks and PK bulking Observation of the processing and mechanism of employment aspects Observation of Chemical Storage, PPE Storage, Hazardous Waste Storage, Fire Control Simulation Mill Waste Management / WWTP, WTP, monitoring wells, mill housing 	LEO/KID/DNA RAB JON
16.30 – 17.00	Presentation of daily progress	All Auditor
Wednesday, 13 September 2023		
08.00 – 12.00	Field Observation to Gelam Estate & Gelam KKPA Aspect to be verified :	

DATE	11-16 September 2023	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
	<ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries) and HCV Observation of warehouses for chemicals, fertilizers, hazardous waste warehouses, workshops, fire control facilities and worker facilities (housing, schools, religious facilities) Implementation of Environmental Aspects, Conservation, Waste Management, Waste, LA and HCV Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) <p>Field Observation to Cemara Estate & Cemara KKPA Aspect to be verified:</p> <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries) and HCV Observation of warehouses for chemicals, fertilizers, hazardous waste warehouses, workshops, fire control facilities and worker facilities (housing, schools, religious facilities) Implementation of Environmental Aspects, Conservation, Waste Management, Waste, LA and HCV Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) 	<p>LEO/KID//DNA</p> <p>RAB</p> <p>JON</p>
12.00 – 14.00	Break	All Auditor
14.00 – 16.30	<ul style="list-style-type: none"> Document review and completing audit checklist Verification of stakeholder consultation result and field visit 	All Auditor
16.30 – 17.00	Presentation of daily progress	All Auditor
Thursday, 14 September 2023		
08.00 – 12.00	<p>Field Observation to Tengkalat Estate & Tengkalat KKPA Aspect to be verified :</p> <ul style="list-style-type: none"> Implementation of Legal Aspect (Land Ownership, Legal Boundaries) and HCV Observation of warehouses for chemicals, fertilizers, hazardous waste warehouses, workshops, fire control facilities and worker facilities (housing, schools, religious facilities) Implementation of Environmental Aspects, Conservation, Waste Management, Waste, LA and HCV Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) 	<p>LEO/KID/DNA</p> <p>RAB</p> <p>JON</p>
12.00 – 14.00	Break	All Auditor
14.00 – 16.30	Document review and completing audit checklist	All Auditor
16.30 – 17.00	Presentation of daily progress	All Auditor
Friday, 15 September 2023		
08.00 – 11.00	Document review and completing audit checklist	All Auditor
11.00 – 14.00	Break	All Auditor
14.00 – 15.00	Internal Meeting Auditor Team	All Auditor
15.00 – 17.00	<p>Closing Meeting</p> <ul style="list-style-type: none"> Presentation of audit findings (Noteworthy Positive Component, Non Conformities, OFI, Timelie of CAR's, Conclusion) 	All Auditor

DATE	11-16 September 2023	
PLANNED TIME	PROCESSES / CLAUSES TO BE AUDITED	AUDITOR
	<ul style="list-style-type: none"> Comments, Responses and Questions 	
Saturday, 16 September 2023		
07.00 – 09.00	Site → Bandara	All Auditor
10.45 – 12.00	Pangkalan Pinang (PGK) → Jakarta (CGK) / Garuda Indonesia GA-137	All Auditor